



Draft Rother Local Plan 2025 - 2042

Interim Sustainability Appraisal

in support of the Regulation 18 stage consultation on the
Development Strategy and Site Allocations

January 2026

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

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Non-Technical Summary

1. This is a Non-Technical Summary of the Interim Sustainability Appraisal Report, which has been prepared in support of the new Rother Local Plan. The full report follows this summary.

Background

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

7. This SA report also includes a Health Impact Assessment, to ensure health and wellbeing is fully considered with the SA.
8. A Habitats Regulation Assessment, for internationally and nationally protected habitats sites, will also be prepared but this is separate to the SA.

The SA Process

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

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

Stage B: Developing and refining options and assessing effects.

Stage C: Preparing the Sustainability Appraisal Report.

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

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

10. Stage A was carried out with the preparation and publication of the SA/SEA Scoping Report in January 2021.
11. A draft Scoping Report was first prepared by the Council, working jointly with Hastings Borough Council. The Councils then consulted the statutory environmental bodies (Environment Agency, Historic England and Natural England) on this report. Selected Government bodies, neighbouring authorities and other key stakeholders were also consulted. Informed by consultation feedback, the final SA/SEA Scoping Report was prepared and published. This established the SA Framework for the

preparation of the new Local Plan, which is discussed further below.

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

Local context and the SA Framework

About Rother district

15. The plan area for the new Rother Local Plan covers all of the administrative boundary for Rother district. Rother is a one of 5 lower tier local authorities in East Sussex, also including Eastbourne Borough Council, Hastings Borough Council, Lewes District Council, and Wealden District Council. East Sussex County Council is the upper tier authority. Rother covers roughly 200 square

miles by area, with a coastline spanning some 25 miles.

16. The resident population of Rother is approximately 91,000, according to Census 2021 data, with roughly half of the population residing in Bexhill. There is an established settlement hierarchy, with the larger settlements of Bexhill, Battle and Rye, and a supporting network of smaller settlements and villages; however much of the district is rural in nature.
17. Although not a wealthy area relative to other more affluent parts of the Southeast, Rother is an attractive and safe place to live. However, despite the district having many positive attributes, it also faces issues including the availability of affordable housing, areas that experience deprivation (and some of the highest levels in the country), and the need to build a more diverse and resilient local economy.

Figure A: Context for the Rother Local Plan



18. Most of Rother district (83 per cent) is located within the High Weald National Landscape, a designated 'Area of Outstanding Natural Beauty'. In addition, roughly 7 per cent of the district includes internationally or nationally protected habitats sites.
19. Rother benefits from the presence of built and natural heritage assets. The historic environment is a highly valued and distinctive feature of the area, with statutory protection of over 2,000 listed buildings, 10 Conservation Areas, a number of Scheduled

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

20. The partly low-lying and coastal nature of the district, along with its network of ridges and valleys, make it vulnerable to flooding. The predominant flood risk comes from the sea, rivers and watercourses, although the district also experiences surface water flooding. The majority of the coast benefits from flood defences.

Review of Plans, Policies and Programmes

21. The Local Plan does not sit alone. It must align with a wide range of international, national, regional, and local legislation, policies, and strategies. As part of the SA process, it is important to identify and review relevant plans, policies, and programmes and explain their relationship with the Local Plan.
22. This policy review was first carried out in the SA/SEA Scoping Report (2021) and then updated in the Interim Sustainability Appraisal Report (2024), which should be referred to for further information. This SA report signposts some of the key plans, policies and programmes and provides updates to the policy context.
23. At the international level, the Strategic Environmental Assessment Directive and Habitats Directive are important as they require SEA and habitats assessments to be undertaken during the preparation of the Local Plan.
24. Nationally, there is legislation and policy that sets the overall framework for planning, environmental protection, and biodiversity - including the Planning and Compulsory Purchase Act 2004, and the National Planning Policy Framework (NPPF). Recent reforms introduced by the Levelling Up and Regeneration Act 2023, alongside updated policies on transport, waste, and traveller sites, must also be considered.

25. Regionally and locally, strategies such as the East Sussex Waste and Minerals Local Plan, Local Transport Plan 4 (2024–2050), Climate Emergency Plan, National Landscape Management Plan, and emerging Nature Recovery Strategy set out strategies to address climate change, sustainable transport and nature. Additionally, there are neighbouring authorities’ Local Plans and adopted Neighbourhood Plans which set planning policies that affect the district.

Key sustainability issues

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

Figure B – Key sustainability issues for Rother and risks without the Local Plan



SA Framework

27. The SA Framework is the tool that is used to assess the emerging Local Plan and its policies against environmental, economic and social sustainability objectives.

28. The SA Framework for the Local Plan was presented in the SA/SEA Scoping Report (2021). This set out 20 sustainability objectives for assessing the Local Plan. These objectives are listed in the table below and are organised by key topics/themes.

Figure C – Rother SA Framework Summary

SA Theme	SA objective
Air Quality	1. Reduce air pollution from transport and development and improve air quality.
Biodiversity	2. Biodiversity is protected, conserved and enhanced.
Energy and Water Consumption	3. The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)
Energy / Water Consumption	4. Minimise water consumption.
Climate Change	5. Manage and reduce the risk of flooding (fluvial, tidal and surface water), now and in the future, and increase resilience to the wider effects of climate change.
	6. The risk of coastal erosion is managed and reduced, now and in the future.
Population, Health and Wellbeing	7. The health and well-being of the population is improved and inequalities in health are reduced.
	8. More opportunities are provided for everyone to live in a suitable home to meet their needs.
	9. All sectors of the community have improved accessibility to services, facilities, jobs, and social and cultural opportunities.
	10. Safe and secure environments are created and there is a reduction in crime and fear of crime.

SA Theme	SA objective
Heritage	11. Historic environment/ townscape is protected, enhanced and made more accessible.
Land and Water Quality	12. The risk of pollution to land and soils is reduced and quality is improved.
	13. Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced.
	14. The risk of pollution to water is reduced and water quality is improved.
Natural Landscape	15. Ensure that Parks, gardens and countryside are protected, enhanced and made more accessible.
Skills, Employment and Economic Development	16. Economic performance is improved.
	17. There are high and stable levels of employment and diverse employment opportunities for all.
	18. Levels of poverty and social exclusion are reduced, and the deprivation gap is closed in the more deprived areas.
	19. Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve.
Transport	20. Road congestion levels are reduced and there is less car dependency and greater travel choice.

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

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

Assessment scoring

30. The draft Local Plan policy proposals (and reasonable alternatives) are being assessed against the 20 SA Objectives, as set out in the SA Framework.
31. A scoring key is used for the assessment, with a symbol and colour code marked for the likely effects of the Local Plan proposals – positive, neutral or negative. The results of the scores for all 20 SA Objectives are set out in tables. These are supplemented by supporting text.
32. As part of the assessment, plan proposals are considered by themselves as well as in combination with other plan, policies and programmes. In addition, their potential effects are considered over the short, medium and long-term.

Figure D – SA Scoring Key

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

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

SA of the Development Strategy options

What is a Development Strategy?

33. One of the key parts of the Local Plan is the Development Strategy. This sets out the overall approach to managing growth and new development in Rother over the plan period. It identifies the main locations where new housing, employment, community facilities and other uses will be directed to and built.
34. The Development Strategy seeks to address the development needs of the district. This includes the Government's housing target (or Local Housing Need figure) for Rother, which is set by national planning policy. The Government's target is 912 new homes per year, compared to the target in the Council's adopted plan of 335 new homes per year.

Preparing the Development Strategy

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

- Opportunities to create new settlements, or large extensions to existing settlements; and
- Opportunities for new development on the edge of the district boundary in areas close to other settlements outside of Rother.

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

Figure E – Initial Development Strategy Options

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

38. The initial ‘preferred approach’ combined these options: SD01, SDO2, SDO3A, SDO4, SDO5, SDO6, SDO10, SDO11.

39. The Council received thousands of comments on the draft Local Plan (2024) from the consultation, with many comments on the Development Strategy. These included suggestions for additional options which the Council had not, to that point, considered. Therefore, it prepared additional options based on these comments, as set out below.

Figure F – Additional Development Strategy Options

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

40. These additional options were then tested using the SA Framework, as part of the focus of this Interim Sustainability Appraisal.

41. Additional option 13 scored positively overall. The SA concluded that it provides a positive strategy to focus growth within and around existing settlements with access to local services, and that impacts to landscapes can be minimised due to development within and around existing built-up area.

42. Additional option 14 scored negatively overall. The SA concluded that whilst the option helps to meet identified development needs, the strategy would likely have an adverse impact on natural landscapes and the environment, as well as undermine the separation of settlements.

The revised Preferred Approach for the Development Strategy

43. Based on the SA of these additional options and consultation feedback, the Council

revised the preferred approach for the Development Strategy. This was tested using the SA Framework.

44. The revised preferred approach combined the following options: SDO1, SDO2, SDO3A, SDO4, SDO5, SDO6, SDO11, SDO13, along with options for gypsy, traveller and travelling showpeople.
45. The SA concluded that the preferred approach for the Development Strategy was positive overall, particularly for objectives around housing and employment. This scoring however recognised that it was unlikely that the Government's housing target would be achieved but still provides for a significant increase in housing supply.
46. There were a number of neutral scores recorded against the SA objectives, as well as a negative score in association with emissions. This reflects the tension between increasing development in the district, whilst seeking to protect the environment, such as the National Landscape and countryside, and addressing climate change. The SA includes suggested mitigation measures in response to this.
47. The revised 'preferred approach' has been included in the draft Local Plan – Development Strategy and Site Allocations (2026) document, which is the subject of the current public consultation.
48. Council's reason for selecting this combined option as the preferred approach was that it provided a sustainable option overall, and would significantly boost housing supply, whilst ensuring protection of the National Landscape and habitats sites, in line with the statutory requirements. Furthermore, the approach is one that is considered to be deliverable based on land that is suitable and available for development; and can be appropriately supported by infrastructure.

SA of the Development Density Options

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

The Housing Density Options

52. The Council has prepared a Density Background Paper which sets out information on how the housing density options were prepared. This should be referred to for further information, but a summary is provided below.
53. There are 3 density options considered for comparison purposes and scoring in the SA. The first option is based on the existing Local Plan and also examples of recent developments built in the district, also known as the 'baseline'. The other options are density levels that are higher than the baseline. The density options are set out as dwellings per hectare (dph) – or the number of homes that could be built on one hectare of land; a higher dph means that higher densities can be achieved on the same area of land, in principle, and therefore a higher number of homes.

Figure G – Housing Density Options

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

54. For each of these main density options, the Council provided density figures within the district, for the following locations or area types:

- Urban areas;
- Suburban areas;
- ‘Live Well Locally’ areas²; and
- Village areas.

55. The density options were then scored using the SA Framework.

Scenario testing the Housing Density Options

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

tested through the SA, as discussed later in this section.

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

58. The results of the density scenario test is set out in the table below.

Figure H – Housing Density Scenario Testing

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

The Development Density Preferred Approach

59. A ‘preferred approach’ for the density standard was selected based on this scenario testing exercise and other evidence. The Council is proposing to use the higher density standard (Option B) for the draft Local Plan.

60. The SA concluded that the business-as-usual approach (Option A) would be likely to have less environmental impacts than the higher density options. However, it did not provide for significant positive scores on housing objectives. This was a very important finding for the Council, given the strong Government direction for boosting housebuilding and meeting local housing needs.

² These were defined by the draft Rother Local Plan (2024).

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

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

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

SA of the Site Allocation options

SA of the draft HELAA sites

63. To inform the preparation of the Local Plan, the Council has produced a Housing and Economic Land Availability Assessment. (HELAA). The purpose of the HELAA is to provide an assessment of the potential supply of land which is 'suitable, available and achievable' for housing and economic development over the plan period.

64. The HELAA is the starting point for considering development sites that may be

appropriate to bring forward in the Local Plan as 'site allocation' policies – the HELAA effectively provides the initial broad range of site options (or alternatives) to be considered during the preparation of the plan.

65. A draft HELAA (2024) was published to support the first Regulation 18 consultation on the draft Rother Local Plan (2024). This study assessed over 900 sites for their suitability for future development.

66. The draft Local Plan, at that time, did not include proposed site allocation policies. However, it did provide information on findings of the draft HELAA (2024). Furthermore, the draft HELAA was published during the first Regulation 18 stage consultation, with the public invited to comment on it.

67. The Interim Sustainability Appraisal (2024) provided an assessment of the draft HELAA sites. Findings of the SA were used to inform the preparation of the next draft Local Plan – Development Strategy and Site Allocations document. The Interim Sustainability Appraisal should be referred to for further information for scoring of sites at that time.

SA of the proposed Site Allocations

68. A revised draft HELAA (2026) has been prepared, based on the latest available information. The study has been published to support the second Regulation 18 consultation on the draft Rother Local Plan – Development Strategy and Site Allocations.

69. Individual site allocations have been scored by the SA, using the SA Framework. A unique 'SA Template' has been created to score sites against the Sustainability Objectives. This template differs slightly from the scoring for other types of Local Plan policies (and also the scoring of HELAA sites in the first Interim Sustainability Appraisal).

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

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

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

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

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

Figure I – Sites Assessed using Template

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

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

75. The SA includes suggested mitigation measures for the proposed site allocations. These mitigations are set out for sites within sub-areas because these share similar characteristics. The mitigation measures are intended to help address negative impacts identified by the SA, and to improve the overall sustainability. The mitigations have been considered by the Council when preparing the site allocation policies for the

draft Local Plan (including development requirements and design guidelines).

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

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

SA of the Area-based Policies

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

Limitations and difficulties encountered in preparing the SA Framework

82. It is a requirement of the SEA Regulations that, when providing a description of how the assessment was undertaken, information is provided on any difficulties encountered in compiling the required information.
83. The main difficulties of undertaking the SA were:
 - Ensuring the SA was an 'objective' exercise. There is inevitably some 'subjectivity' with the assessment of policy options, as the professional judgement of planning officers is used in the SA process. To help address this, the SA Framework includes clear objectives and guiding questions, and the Council has prepared a bespoke 'template' for use in the SA of site allocations and reasonable alternative sites, using digital mapping for accuracy of information. The template is set out in Appendix 3 of the main report.
 - Assessing proposed policy options independently, and on their own merits (i.e., in the absence of how they might function in combination with other policies). To address this, a 'policy off' approach is used for the

SA in the first instance, so to consider policy options by themselves. It then considers policies together with other policies, and plans. This helps the SA to identify mitigation measures that can be included in the plan to help address potential negative or adverse impacts of policies.

- Maintaining an up-to-date baseline of information to consider impacts of policy proposals. This is because information about the district, its population and higher-level policies is constantly changing.

SA monitoring arrangements

84. The SEA Regulations require the Council, through the SA, to set out arrangements for monitoring any significant environmental effects of implementing the Local Plan. Monitoring helps to identify whether any predicted (or unpredicted) impacts arise over the plan period, so that measures can be taken to avoid or lessen them.
85. The Council currently monitors the implementation of its existing Local Plan through the Authority Monitoring Report (AMR).
86. Performance indicators will be created to monitor the implementation of the new Local Plan, including specific indicators for the SA. The final SA Report (published at the Regulation 19 stage of the plan process) will include suggested indicators for this monitoring.

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Chapter 1 Background

What is a Sustainability Appraisal?

- 1.1. A Sustainability Appraisal (SA) is a process that is legally required to be carried out during the preparation of a local plan.³ Its role is to promote sustainable development by assessing the extent to which the emerging plan, when considered against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.
- 1.2. The SA should be undertaken as an iterative process to inform the preparation of the local plan. It provides an opportunity to consider ways by which the plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. By doing so, the SA can help make sure that the proposals in the plan are appropriate given the reasonable alternatives.
- 1.3. The Council's approach to the Sustainability Appraisal incorporates the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 - also known as the 'Strategic Environmental Assessment (SEA) Regulations'. This approach is supported by Government's Planning Practice Guidance (PPG). SEA looks at only the environmental effects of a plan, whereas SA considers the environmental impacts of a plan along with wider economic and social effects. For this report therefore, the term SA should be regarded as SA incorporating the requirements of SEA.

Additional assessments

- 1.4. The Council's approach to SA integrates a Health Impact Assessment (HIA). This is an assessment of specific health impacts which is brought into the wider SA process. The Council has engaged with East Sussex County Council's Healthy Places Team in setting this approach.
- 1.5. A Habitats Regulations Assessment (HRA) is also required to be undertaken during the preparation of the local plan however this is dealt with through a separate, standalone process.
- 1.6. An Equalities Impact Assessment of the Local Plan is also undertaken separately from the SA in order to satisfy requirements of the Equality Act 2010. However, it is noted that SA inherently addresses equalities impacts in the round through the consideration of social, economic and environmental objectives and outcomes.

About the Rother Local Plan

- 1.7. The Local Plan forms part of the statutory development plan for Rother district. This currently comprises the [Core Strategy](#) (2014) and [Development and Site Allocations](#) (2019) Local Plans prepared by the Rother District Council, the [Waste and Minerals Local Plan](#)

³ The requirement was made through provisions in the Planning and Compulsory Purchase Act 2004.

prepared by East Sussex County Council, and ‘made’ (adopted) [Neighbourhood Plans](#) prepared by local community groups, including Parish Councils.

- 1.8. Rother District Council (“the Council”) is preparing a new Local Plan. This will contain the vision, strategic objectives and planning policies to steer development decisions across the district. It is the starting point for all decisions about new development and ensures that the planning system is plan-led. Once adopted, the new Local Plan will update and replace the extant Core Strategy and Development and Site Allocations Local Plans.
- 1.9. The Local Plan is being prepared in accordance with provisions set out in the [Town and Country Planning \(Local Planning\) Regulations 2012](#) (as amended), which underpin primary legislation. The Local Plan is required to be consistent with the Government’s [National Planning Policy Framework](#) (NPPF) (2024) and other national policies, including the [Planning Policy for Traveller Sites](#) (2024). The NPPF makes clear that Local Plans should be up-to-date and prepared with the objective of contributing to sustainable development.
- 1.10. Furthermore, the Council has a statutory Duty to Cooperate constructively, actively and on an ongoing basis with neighbouring authorities, county councils and other prescribed bodies in planning for strategic cross-boundary matters.⁴ A local plan can only be adopted and brought into force if the Duty to Cooperate has been met during its preparation, and this is tested at the plan’s independent examination. The Council has been engaging with the relevant prescribed bodies during the preparation of the new Local Plan and taking account of their key plans and strategies.

The plan period

- 1.11. The period covered by the new Local Plan (“the plan period”) has changed since the draft Local Plan was published in 2024. A plan period covering 2020 – 2040 was initially proposed. However, the Council is now revising the Plan Period to 2025 – 2042. This is because the National Planning Policy Framework (NPPF) requires local planning authorities to have an up-to-date plan, with strategic policies that cover a period of at least 15-years from the date it is adopted. Moving the Plan Period on, to end in 2042, will ensure this requirement is met if the Local Plan is adopted, as anticipated, in 2027.
- 1.12. The Council does not consider that the revised plan period affects findings of the SA process to-date. The revised plan period will be considered in this and future SA reports.

Timetable for preparing the Local Plan

- 1.13. The timetable for preparing the new Local Plan is set out in the Council’s [Local Development Scheme](#) (LDS), the latest version of which was adopted in March 2025. The LDS provides for the submission of the draft Rother Local Plan and required supporting documents to the Secretary of State for independent examination by 2026, and subject to the plan being found sound, adoption in 2027.

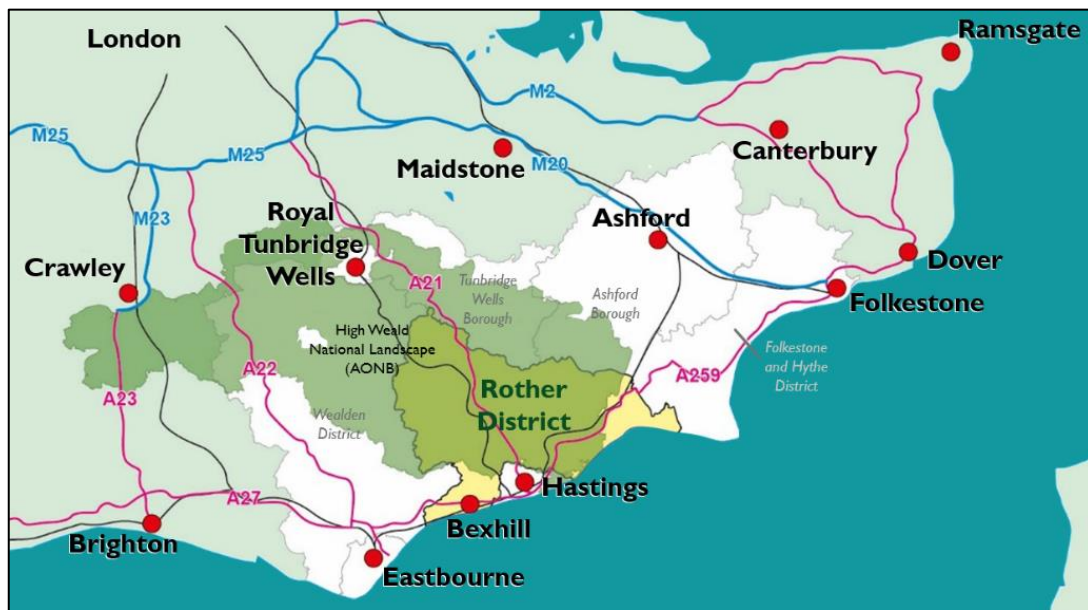
⁴ The duty to cooperate is a legal requirement introduced through Section 33A of the Planning and Compulsory Purchase Act 2004, as inserted by Section 110 of the Localism Act 2011.

- 1.14. The new Local Plan is currently in the early stages of production. Key milestones in the plan preparation process to-date include:
- Early stage (and ongoing) evidence gathering, with a wide range of policy topic area studies and reports published on the Local Plan evidence base webpage;
 - Public consultation on the draft Sustainability Appraisal / Strategic Environmental Assessment Scoping Report with statutory consultees (Environment Agency, Historic England and Natural England) and publication of the final SA/SEA Scoping Report in January 2021; and
 - A statutory Regulation 18 stage consultation on the [draft Rother Local Plan 2020 – 2040](#), which was carried out from 30 April to 23 July 2024. This draft Plan included proposals for policies on a range of thematic topic areas, but not site allocations. An Interim Sustainability Appraisal Report (2024) and Habitats Regulations Assessment Report (2024) were also published for consultation alongside the plan at this time.
- 1.15. The preparation of the draft Rother Local Plan 2025-2042 – Development Strategy and Site Allocations (2026) document, and this associated Interim Sustainability Appraisal Report (2026), represent the next stage in the plan process. These documents have been published for a statutory Regulation 18 stage public consultation, which the Council is now inviting comments on. This draft Plan does not repeat the thematic topic policies of the first Regulation 18 document (except for the Development Strategy) but includes site allocations and area-based policies.
- 1.16. Representations received in response to the public consultation will help the Council to pull together the 'Proposed Submission version' of the Local Plan, which will be subject to a further round of statutory (Regulation 19 stage) public consultation. Following which, the final draft Rother Local Plan and required supporting documents will be submitted to the Secretary of State for independent examination.
- 1.17. The Proposed Submission version of the Local Plan document will include policies relating to many different topic areas (building on the draft Local Plan published in 2024), as well as a final development strategy, site allocations and supporting area-specific policies (building on the draft Local Plan currently being consulted on).

Geographic context for the Local Plan

- 1.18. The plan area for the new Rother Local Plan covers the entirety of the administrative boundary for Rother district. Rother is a one of 5 lower tier local authorities in East Sussex, also including Eastbourne Borough Council, Hastings Borough Council, Lewes District Council, and Wealden District Council. East Sussex County Council is the upper tier authority. The resident population of Rother is approximately 91,000, according to Census 2021 data, with roughly half of the population residing in Bexhill.
- 1.19. Rother is located on the South East Coast of England. It covers roughly 200 square miles by area, with a coastline spanning some 25 miles. The district is predominantly rural in nature and includes the High Weald National Landscape. The geographic context of Rother, and its neighbouring authority areas, is set out in Figure 1 below.

Figure 1: Rother Local Plan geographic context



- 1.20. Rother contains the coastal town of Bexhill-on-Sea, and the historic towns of Battle and Rye. There are also many parishes, villages and other settlements located throughout the district. The A21 runs through the centre of the district north and south, and the A259 running east and west near the coast.
- 1.21. 83 per cent of the district is located within the High Weald National Landscape, a designated 'Area of Outstanding Natural Beauty'. The High Weald is one of the best remaining examples of a medieval landscape in Northern Europe consisting of woods, small fields, farmsteads and ancient routeways.
- 1.22. Rother benefits from the presence of built and natural heritage assets. The historic environment is a highly valued and distinctive feature of the area, with statutory protection of over 2,000 listed buildings, 10 Conservation Areas, a number of Scheduled Ancient Monuments, as well as the 'Historic Battlefield' at Battle.
- 1.23. Approximately 7 per cent of the district includes internationally or nationally protected habitats sites. The Pevensey Levels, straddling the south-western boundary of the district, is a 'Ramsar' site, designated for its international importance as a wetland habitat and a Special Area of Conservation (SAC). On the south-eastern boundary, the Dungeness Complex of Habitats Sites comprises three overlapping international designations – the Dungeness, Romney Marsh and Rye Bay Special Protection Area (SPA) and Ramsar Site and the Dungeness Special Area of Conservation (SAC). There are also many Sites of Special Scientific Interest (SSSIs) in Rother.
- 1.24. The partly low-lying and coastal nature of the district, along with its intricate network of ridges and valleys, make it particularly vulnerable to flooding. The predominant flood risk comes from the sea, rivers and watercourses, although the district also experiences surface water flooding. The majority of the coast benefits from flood defences.

- 1.25. Rother district effectively wraps around Hastings Borough. Because of their proximity and interconnectivity, Rother and Hastings share both a housing market area and a functional economic market area. Both Councils are currently preparing new local plans and are working collaboratively on several shared evidence base documents, as well as working more strategically on cross-boundary issues through the Duty to Cooperate.

What is the Local Plan seeking to achieve?

- 1.26. The new Local Plan is being prepared to ensure that the Council has an up-to-date plan in place that sets the strategic framework for managing new development and securing the timely delivery of infrastructure to support growth. Within this overall context, key aims of the plan include:

- Respond to significant changes to the wider planning context since the Rother Core Strategy and Development and Site Allocations Local Plans were adopted, including changes to planning legislation and revisions to the NPPF.
- Ensure the Local Plan both reflects and helps give effect to the Council's key strategic documents, including the vision and outcomes sought by the [Council Plan](#)⁵ – this sets out the 3 themes of 'a thriving local economy', 'live well locally' and 'green to the core'.
- Respond to the climate emergency and deliver the outcomes sought by the Council's Environment Strategy (2020) and Climate Strategy (2023) – in 2019 the Council declared a climate emergency and pledged to become a 'carbon neutral' district by 2030.
- Respond positively and proactively to Rother's development needs by:
 - Addressing Government requirements to boost housing supply whilst meeting the different housing needs of Rother's local communities;
 - Make provision for good quality jobs, training and employment opportunities, together with workspace to support local business needs including for the rural economy; and
 - Securing the timely delivery of infrastructure to support growth and new development, including community facilities, particularly to support the health and wellbeing of the local community and reduce deprivation.
- Protect and enhance Rother's local distinctiveness and character, including its historic and natural environment, including the High Weald National Landscape the countryside and coastal areas.

⁵ Rother Council Plan 2025-2029.

- To set the strategic context for neighbourhood planning and in doing so, ensure there is a clear framework in place for neighbourhood plans to support the delivery of the Local Plan.

1.27. It is noted that Section 2 of the draft Rother Local Plan (2024) sets out a vision, overall priorities and key spatial objectives for the plan, which should be referred to for further information.

What is the Local Plan not seeking to achieve?

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

Chapter 2 Sustainability context for Rother

The Sustainability Appraisal process

- 2.1. The SA consists of a number of stages that are undertaken during the preparation and implementation of the Local Plan. Key requirements for SA are set out in the legislation noted previously. The Government's PPG provides detailed guidance to help ensure these requirements are satisfied during the plan process. The PPG identifies 5 main stages in the SA process overall, as set out below⁶, with further details set out in Figure 2.

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

Stage B: Developing and refining options and assessing effects.

Stage C: Preparing the Sustainability Appraisal Report.

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

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

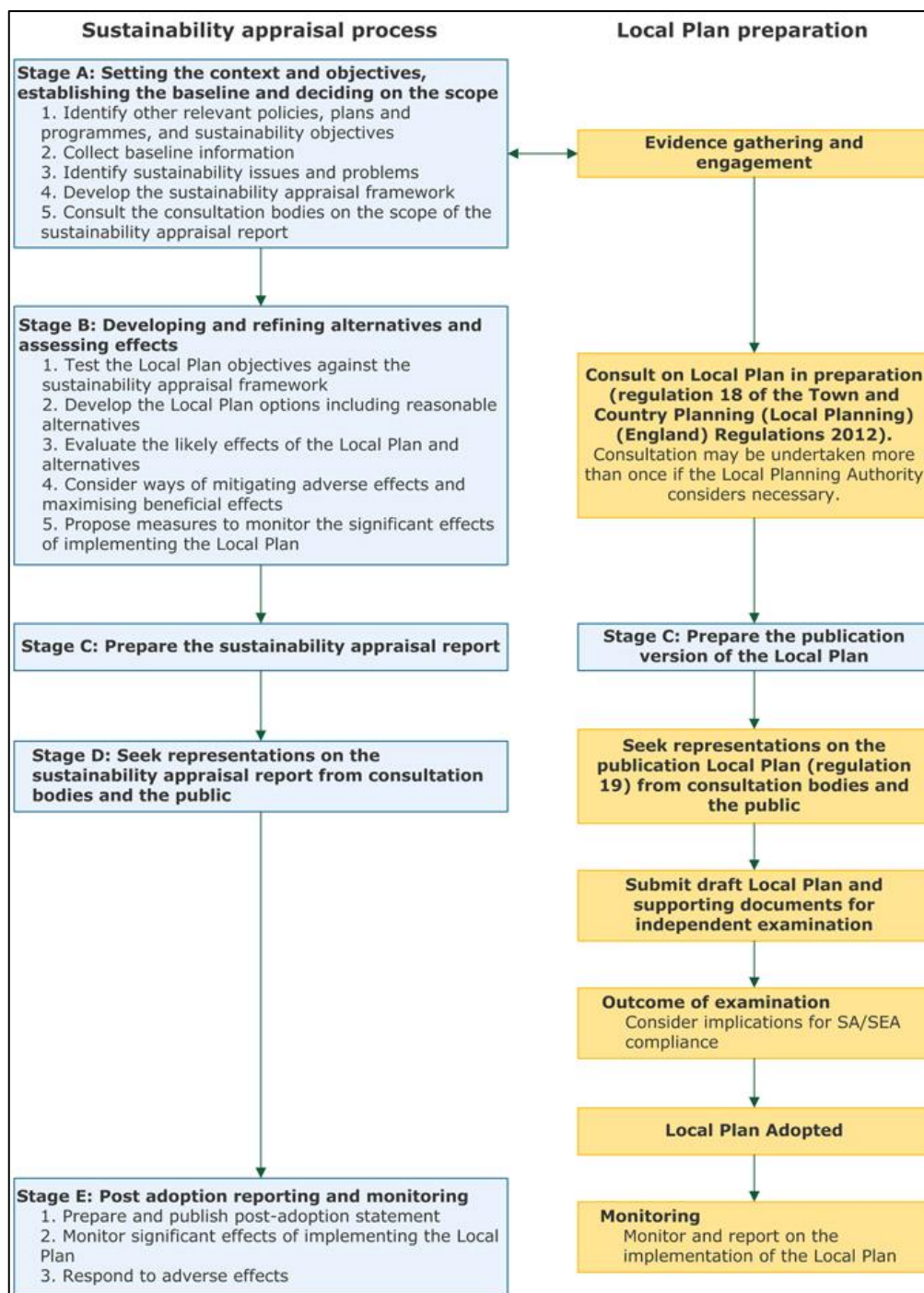
- 2.2. Stage A of the SA process was carried out with the preparation and publication of the SA/SEA Scoping Report in January 2021. A draft Scoping Report was initially prepared by the Council (working jointly with Hastings Borough Council) and then issued for formal consultation with the statutory environmental bodies. Whilst not legally required to do so, the Council also consulted with selected Government bodies, neighbouring authorities and other key stakeholders (mainly dealing with public health and transport). Informed by consultation feedback, the final SA Scoping Report (2021) was prepared and published. This established the SA Framework for the preparation of the new Local Plan.
- 2.3. Stage B of the SA process commenced with the preparation and publication of the draft Rother Local Plan and associated Interim Sustainability Appraisal report, in April 2024. These documents were issued for a Regulation 18 stage consultation, which was carried out from 30 April to 23 July 2024.
- 2.4. Stage B of the SA process is continuing with the preparation and publication of the Rother Local Plan – Development Strategy and Site Allocations and this associated interim Sustainability Appraisal report, in January 2025. These documents are the subject of the current Regulation 18 stage consultation, commencing in January 2025.
- 2.5. Further details on how the Council has carried out Stage B actions (i.e., in terms of the development and refining of options for the draft Local Plan) are set out later in this report.

⁶ MHCLG Planning Practice Guidance, Paragraph: 004 Reference ID: 11-004-20150209 (Revision date: 09 02 2015).

Meeting the SEA requirements

- 2.6. **Appendix 1** of this report signposts the requirements of the SEA Regulations and indicates the relevant sections of this SA Report which are considered to satisfy these.

Figure 2: SA process for the Local Plan⁷



⁷ Figure replicated from MHCLG Planning Practice Guidance, Paragraph: 013 Reference ID: 11-013-20140306 (Revision date 06 03 2014).

Revisiting the Stage A Scoping

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

Review of plans, policies and programmes

- 2.10. The Local Plan does not sit in isolation. Its preparation and implementation must comply with international and national legislation, including that focussed on environmental protection, as well as national planning policy and guidance. Furthermore, in contributing to sustainable development, the Local Plan should seek to both link with and help give effect to the objectives set out by international, national, sub-regional and local programmes and strategies.
- 2.11. As part of the SA process, it is a requirement to identify relevant plans, policies and programmes and to set out their relationship with the Local Plan.⁸ This exercise was initially carried out as part of the SA/SEA Scoping Report (2021), and then updated with the Interim Sustainability Appraisal Report (2024) published as part of the first Regulation 18 consultation on the draft Rother Local Plan.
- 2.12. The following section provides a summary of relevant key plans, policies and programmes, focussing mainly on new documents published since the SA Scoping Report and Interim SA Report (2024) were published.

International level

- 2.13. At the international level, Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive') and Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive') remain particularly significant as they require Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) to be undertaken in relation to the emerging plan. These processes should be undertaken iteratively and integrated into the production of the plan in order to ensure that any potential negative environmental effects (including on European level nature conservation designations) are identified and can be mitigated.

⁸ As set out in Schedule 2 of the SEA Regulations.

- 2.14. There are a wide range of other (previous) EU Directives relating to issues such as water quality, waste and air quality, most of which have been transposed into UK law, as set out in previous SA reports.

National level

- 2.15. The Planning and Compulsory Purchase Act 2004 is primary legislation that provides the main basis for the plan-led system in England. It is supported by secondary legislation, including the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), which provide further details on the process for the Council to prepare and adopt the Local Plan and other supporting documents.
- 2.16. The Local Plan is required to be consistent with national policy, including the National Planning Policy Framework. The NPPF sets out the Government's planning policies for England and how they should be applied. It includes parameters for the preparation of local plans and is also a material consideration in planning decisions. The NPPF is supported by the national Planning Practice Guidance. The NPPF was first introduced in 2012 and has been subject to multiple updates, with the latest version being published in December 2024, and a consultation draft published in December 2025. The NPPF makes clear that Local Plans should be up-to-date and provide a positive vision for the future of each area, together with a framework for meeting housing needs and addressing other economic, social and environmental priorities.
- 2.17. There is a separate Planning Policy for Traveller Sites, which was most recently updated in December 2024, and a Planning Policy for Waste (2014), both of which should be considered in conjunction with the NPPF.
- 2.18. The Levelling Up and Regeneration Act 2023 (LURA) received Royal Assent in October 2023. The LURA is a wide-ranging piece of legislation focussing mainly on local governance, planning reform and regeneration / economic development, and therefore has key implications for local planning. However, several of its provisions are awaiting further Regulations or secondary legislation to bring them into force. It was expected that a new plan-making system under the LURA would be in place by the end of 2024, but following a change in Government timings have shifted, with, at the time of writing, the publication of further policy or legislation pending.
- 2.19. Notably, the LURA introduced the 'landscape duty', which primarily concerns the management and conservation of Protected Landscapes in England, which include National Parks and National Landscapes (formerly Areas of Outstanding Natural Beauty). This duty requires relevant authorities, such as local councils and planning authorities, to actively seek to further the statutory purpose(s) of these landscapes rather than merely having regard to them. This is significant given that some 83 per cent of Rother district is covered by the High Weald National Landscape.
- 2.20. The Government's Department for Transport (DfT) Circular 01/2022, Strategic Road Network and the Delivery of Sustainable Development advocates a new 'vision-led' approach to transport planning, which is now embedded in the NPPF (2024). The approach represents a departure from the 'predict and provide' model for transport planning, impact assessments and mitigations to the highway network. At its heart, the Circular seeks an

integrated approach to transport and land-use planning, as well as place-making, with a focus on reducing car use and encouraging modal shift.

- 2.21. The Environment Act 2021 establishes a comprehensive legal framework for environmental protection in the UK, focusing on air quality, biodiversity, water resources, and waste management. The Act includes new environmental targets, requirements for habitat restoration and biodiversity net gain, along with provisions for waste reduction and management and improving water resources. The Act also introduces a strengthened 'biodiversity duty' which requires all public authorities in England to consider what they can do to conserve and enhance biodiversity. In December 2025, the Government published a revised Environmental Improvement Plan. This document provides a roadmap for improving the natural environment and, taking a multi-stakeholder approach, seeks to provide clarity on what, how and who will deliver the Government's environmental ambitions.
- 2.22. The UK Marine Policy Statement (2019) is the framework for preparing Marine Plans and taking decisions affecting the marine environment, with the overarching aim of contributing to sustainable development in the United Kingdom marine area. The Guidance to the UK Marine Policy Statement, from 1 January 2020, explains how references to EU law should be interpreted following the UK withdrawal from the European Union. Within this framework, the South Inshore and Offshore Marine Plan is relevant to Rother district and the preparation of the Local Plan. It introduces a strategic approach to planning within the inshore and offshore waters between Folkestone in Kent and the river Dart in Devon.

Regional and local level

- 2.23. The East Sussex Waste and Minerals Local Plan comprises a series of documents which form part of the statutory development plan for Rother district. They are therefore significant in relation to the Local Plan. These documents include The East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan – Revised Policies (2024), and the Waste and Minerals Sites Plan (2017).
- 2.24. The East Sussex Local Transport Plan 4 2024-2050 (LTP4) was adopted in October 2024. Local Transport Plans are a requirement of the Transport Act 2000, which provides that such plans must set out both an overall strategy and implementation plans. Key changes to this latest version of the plan include an increased emphasis on climate change, the need to decarbonise transport, and how the Covid-19 pandemic has impacted user needs and the way in which people choose to travel. Furthermore, transport accessibility, equity and inclusiveness, and the opportunities to support healthy lifestyles have become a priority for transport investment.
- 2.25. The East Sussex Climate Emergency Plan 2025-2030 and Climate Emergency Roadmap set out an evidence base, objectives and action plan to achieving the vision for East Sussex to be a net zero and climate resilient county. The documents support wider national policies and objectives around climate change mitigation and adaptation.
- 2.26. The Draft Local Nature Recovery Strategy for East Sussex and Brighton & Hove (2025) is an emerging document that is relevant to the Local Plan. Nature Recovery Strategies are a

new legal requirement arising from the Environment Act 2021. They are spatial strategies which, when adopted, will cover the whole of England, intended to drive more coordinated, practical and focused action on nature recovery, including biodiversity net gain.

- 2.27. The High Weald Area of Outstanding Natural Beauty (AONB) Management Plan 2024-2029 covers the extent of the High Weald National Landscape, large parts of which are situated in Rother district. The Plan is divided into two sections. The first describes the core components of natural beauty to be conserved and enhanced, along with key ambitions and proposed actions for stakeholders. The second section addresses the main drivers of change (or cross-cutting themes) affecting the High Weald, providing principles to underpin activities and a strategy for investment 2024-2029.
- 2.28. There are neighbouring authorities to Rother that have adopted or emerging Local Plans. These need to be considered during the preparation of Rother's new Local Plan and the SA. This will help to ensure coordination on strategic, cross-boundary matters. As noted above, the Council is continuing to engage with neighbouring authorities through the Duty to Cooperate. Key adopted plans include Ashford Local Plan (2019); Folkestone and Hythe Core Strategy Review (2022); Wealden District Core Strategy (2013); Tunbridge Wells Local Plan (2025); Hastings Planning Strategy (2014); Eastbourne Core Strategy (2013) and Eastbourne Borough Plan saved policies (2003); and Lewes District Core Strategy: Local Plan Part 1 (2016).
- 2.29. There are currently 9 made (adopted) Neighbourhood Plans in the district, which form part of the statutory development plan. These cover the following areas: Battle; Burwash; Crowhurst; Hurst Green; Peasmarsh; Rye; Saleshurst & Robertsbridge; Sedlescombe; and Ticehurst. The Neighbourhood Plans include policies which help to support the implementation of the strategic policies set out in the Local Plan.

Baseline information and key sustainability issues

- 2.30. The SEA Regulations provide that the environmental report should describe "the environmental characteristics of areas likely to be significantly affected", and "the relevant aspects of the current state of the environment and the likely evolution thereof without the implementation of the plan or programme".⁹
- 2.31. These requirements have been considered through the preparation of the SA/SEA Scoping Report (2021), which provided a detailed discussion on the environmental aspects of the district, as well as the social and economic situation within it (i.e., the baseline). This work was then updated in the Interim SA Report (2024). Taking this information into account, a range of key sustainability issues were identified.
- 2.32. Following on from this assessment of the baseline situation and identification of sustainability issues, it is possible to make an informed judgement on what the situation is likely to be, or how it may be expected to evolve, in the absence of the Local Plan. The outcomes of this exercise are provided in Figure 3 below, which has been slightly updated from the SEA/SA Scoping Report (2021).

⁹ SEA Regulations, Schedule 2(3) and 2(2).

Figure 3: Key sustainability issues for the Local Plan

Key sustainability issue	Likely evolution without the Local Plan
Air quality	
<ul style="list-style-type: none"> New development has the potential to lead to increase in air quality impacts from increased traffic generation and movements, unless a modal shift away from car use to sustainable transport (including active travel) measures is achieved. Decarbonisation and the links to air quality and transport in general is a key issue, including the role that transport must play in reducing carbon emissions. Technological improvements are likely to have an impact on air quality levels over the long term, which may support improvements in air quality, e.g. ultra-low emission vehicles, sustainable design and construction. 	Potential to realise only incremental or no improvement in air quality levels or an increase of the current baseline levels of pollution.
Biodiversity	
<ul style="list-style-type: none"> Development has the potential to adversely impact on biodiversity and environmental designations, e.g. Local Wildlife Sites in Rother District. The need to protect and enhance networks of blue green infrastructure, including by improving habitat connectivity, together with delivering Biodiversity Net Gain. The need to appropriately manage development to ensure no significant adverse impact on nationally and internationally designated nature sites, coastal areas and the High Weald National Landscape. 	<p>Potential to adversely impact on habitats and species, including sites that are designated for their environmental importance.</p> <p>Limited scope for achieving Biodiversity Net Gain.</p>
Energy and water consumption	
<ul style="list-style-type: none"> New development has the potential to increase energy consumption. Domestic water consumption per capita is above national targets. 	Potential to maintain or increase levels of energy and water use and consumption, particularly in domestic buildings.
Climate, flooding and coastal change	
<ul style="list-style-type: none"> Water run-off from development / surface water flooding and wastewater management. Coastal erosion has the potential to impact existing properties and future development - the coastal defence strategy is important for this issue moving forward. The need to ensure new development is located to those areas at least risk of flooding from all sources, and to ensure new development does not increase risk of flooding in the district and beyond. Need to reduce the risk of flooding from all sources, taking account of the impacts of climate change. 	<p>Development may be directed inappropriate locations, such as those vulnerable to flood risk or coastal erosion.</p> <p>Increased risk of flooding from all sources, including surface water flooding, associated with new developments and urbanisation, and/or the cumulative impact of the loss of permeable surfaces across the area.</p>
Population, health and wellbeing	

Key sustainability issue	Likely evolution without the Local Plan
<ul style="list-style-type: none"> • Ageing population in Rother and associated needs for health and social care. • Obesity and associated health impacts, particularly in young children. • Widening gap between wages and property values, worsening access to the property markets and increasing homelessness figures in areas of the district. • Crime and perceptions of safety. • Overall level of deprivation in the district and particularly in more deprived areas. 	<p>Lack of availability of housing to meet the wide range of local housing needs, including access to affordable housing and specialist accommodation.</p> <p>Potential worsening of deprivation and inequality in the district, including health inequalities.</p> <p>Potential for a lack of adequate services and community facilities to meet the needs of new developments and a growing population.</p>
Heritage	
<ul style="list-style-type: none"> • Scoping suggests no specific historic environment conservation issues at the strategic level. Rather, there are issues in relation to specific buildings and other heritage assets, whose significance may be comprised without effective development management. • There may be opportunities to make heritage assets more accessible and sustainable. 	<p>New development has the potential to adversely impact on the significance of heritage assets and their setting.</p>
Land and water quality	
<ul style="list-style-type: none"> • Increase in general household waste, with links to decrease in domestic recycling. • Changes in bathing water quality across the district. • Emerging local policies should address brownfield sites, groundwater protection and key infrastructure development relating to surface water and foul water drainage. • Changes in the ecological status of relevant waterbodies as a potential result of development, to be measured against the requirements of the Water Framework Directive. 	<p>Increase in waste generation and waste management requirements associated with new development.</p> <p>Increased pressure on the water and wastewater network, which could lead to capacity and servicing issues.</p> <p>Potential deterioration in the ecological status of waterbodies.</p>
Natural landscape	
<ul style="list-style-type: none"> • A significant proportion of Rother District is located within the High Weald National Landscape, which is statutorily protected. 	<p>Inappropriately located and designed development, with potential harm to the National Landscape, or other landscape character settings.</p>
Skills, employment and economic development	

Key sustainability issue	Likely evolution without the Local Plan
<ul style="list-style-type: none"> Economic performance of business is showing signs of improvement since Covid; however, there are still high levels of the population that are economically inactive and with no or lower qualifications. 	<p>Economic development could be inhibited in the absence of a sufficient amount and availability of good quality of business space.</p> <p>Lack of access to community facilities (including for education and training) could have an adverse impact on local labour supply.</p>
Transport	
<ul style="list-style-type: none"> There is a high dependency on the private car for travel movements, especially in rural locations. Reduction in levels of walking in Rother. 	<p>Continued reliance on the car, and less take-up of modal shift, with negative implications for air quality, carbon reduction and public health.</p>

The SA Framework

2.33. The creation of the SA Framework is one of the key outcomes of Stage A of the SA process. It is the tool that is used to assess the emerging plan policies against environmental, economic and social sustainability objectives.

2.34. The SA Framework for the new Local Plan was presented in the SA/SEA Scoping Report (2021). This set out 20 key sustainability objectives against which the emerging Local Plan policies are to be appraised. A series of decision-aiding questions have been devised for each SA Objective in order to facilitate the appraisal process. Each question is intended to be considered in order to identify:

- The nature the principal impacts (effects) of the policy proposal or reasonable alternative option (e.g., whether positive or negative);
- How these impacts may change over time;
- The relative magnitude of the impacts.¹⁰

2.35. The final point, referring to magnitude, serves as an initial proxy for identifying the relative significance of the impacts. This exercise also provides an initial opportunity to identify potential cumulative and synergistic impacts and to consider appropriate mitigation measures.

¹⁰ These effects cannot always be determined definitively at the plan-making stage. However, the questions provide a useful and informed means of assessing 'likely' or 'predicted' impacts of plan proposals in line with the SEA Regulations.

2.36. 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; and
- How they contribute to achieving or restrict the achievement of the various elements of the SA Objectives.

Figure 4: Sustainability Appraisal Framework for 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 priority species and habitats, and increase local biodiversity? • Achieve a net gain in biodiversity? • Protect and enhance ecological networks?
Energy and Water Consumption	3. The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)	<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?

SA Theme	SA objective	Appraisal questions: will the option/proposal help to...
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 live 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?
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?

SA Theme	SA objective	Appraisal questions: will the option/proposal help to...
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 National Landscape in line with the aims and objectives of the 2024-2029 Management Plan, and Protected Landscapes duty? • Protect and enhance the natural environment? • Encourage access to the natural environment (including parks, open spaces, recreational opportunities and the coast)? • Protect sensitive and special landscapes?
Skills, Employment and Economic Development	16. Economic performance is improved.	<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?
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?

SA Theme	SA objective	Appraisal questions: will the option/proposal help to...
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?

Compatibility of SA Objectives

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

Key findings

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

objectives for waste minimisation and management (Objective 13) and sustainable transport, in so far as reducing car use and dependency (Objective 20).

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

Figure 5: Compatibility of SA Objectives

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

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

Chapter 3 Sustainability Appraisal Methodology

- 3.1. This section of the report provides details of the methodology used for undertaking the SA of the draft Rother Local Plan.

Stage A Scoping

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

Stage B Developing and refining alternatives and assessing effects

Background

- 3.3. The SEA Regulations require that the SA Report should identify, describe and evaluate the likely significant effects on the environment, both in terms of implementation of the Local Plan (and its policies), along with other reasonable alternatives considered during the preparation of the plan, taking account of the objectives and geographical scope of the plan.¹¹ For the purposes of the SA, this is broadened to include consideration of the environment as well as social and economic effects, in line with the NPPF¹² and the associated PPG.
- 3.4. Developing reasonable alternatives (options) for the Local Plan is an iterative process. It typically involves front-loading of work by the Council (including production of the technical evidence base, deciding on the key issues for the plan, and approaches to addressing these). This early-stage work is informed by informal engagement and formal public consultation with statutory bodies, along with other key stakeholders and the wider public. Public consultation is an integral part of the plan-making and SA process. Feedback received can assist in identifying reasonable alternatives for the plan policies and further inform the selection of preferred approaches.
- 3.5. It is important for the Council, through the SA Report, to make clear why and how the reasonable alternatives were selected. As well, the alternatives should be decidedly distinct so to enable meaningful comparisons between these through the SA process. It is important to note that not all potential policy alternatives for the Local Plan necessarily need to be considered and appraised. The emphasis should be on ‘reasonable’ alternatives that can feasibly and realistically be implemented, given local circumstances.
- 3.6. The development and appraisal of policy alternatives is intended to be undertaken as an iterative process during the preparation of the Local Plan. As noted above, public consultation is a key consideration during this process, and it is therefore important that the SA runs in parallel with plan production. However, public consultation feedback is not the only consideration for plan-making. Indeed, the Local Plan must respond to a wide

¹¹ SEA Regulations, Regulation 12(2).

¹² NPPF (December 2024), paragraph 33.

range of factors including planning legislation, national and regional planning policy, technical evidence and plan deliverability considerations, including development viability.

Assessing the reasonable alternatives

- 3.7. This SA report includes detailed assessments of the options for the Development Strategy and site allocation policies considered during the preparation of the draft Rother Local Plan. This includes the preferred options (or approaches) as well as the **reasonable alternatives** that have been discounted at this stage in the plan process.
- 3.8. It is noted that the Council has prepared a number of 'Background Papers' that form part of the Local Plan evidence base. These are broadly set out by thematic policy topic area. The Background Papers provide an 'audit trail' of the policy preparation. They help to justify the preferred policy approaches in the draft Local Plan, including the Development Strategy, and also explain why some options were not considered or discounted at this stage in the plan process. The SA is an important consideration in this regard.
- 3.9. The assessments are primarily set out in tables that provide a comparative summary of findings for the policy options against the SA framework. This helps to identify potential or likely 'significant' effects, including consideration of short-term to long-term impacts and synergies with other policies and programmes, including but not limited to those in the draft Local Plan.
- 3.10. Policy options have been assessed using the SA Framework, set out earlier in this report. This identifies 20 sustainability objectives and includes key questions to assist with the appraisal of the options against these objectives. Scores are then assigned to the policy options considering their likely effects, using the 'scoring key' set out below.
- 3.11. In addition, the SA then considers cumulative and synergistic effects of the policy options (factors that may interact in a synergistic way and may increase cumulative affects either positively or negatively), as well as potential mitigation measures (to mitigate or avoid negative effects and enhance positive effects). The tool used for this second part of the appraisal is set out in Figure 6 below.

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

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

Appraisal scoring

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

Figure 7: SA scoring key

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

Stage C Preparing the SA Report

- 3.15. The final Sustainability Appraisal report (i.e., the 'Environmental Report' required by the SEA Regulations) will be prepared for and published at the Regulation 19 stage of the plan process. This is when the 'Proposed Submission' version of the Local Plan is issued for a statutory public consultation.
- 3.16. The final SA Report will set out the process that has been undertaken in carrying out the SA of the Rother Local Plan. It will also discuss the Council's reasons for selecting the preferred policy approaches and reasonable alternatives during the preparation of the plan. The focus of the appraisal will be on the identification of likely significant effects of implementing the Local Plan, in accordance with the SEA Regulations. This will include consideration of cumulative and synergistic effects over a range of time periods (short,

medium and long-term), and whether these effects are anticipated to be permanent and/or temporary.

- 3.17. The final SA Report will be informed by and build upon the Interim Sustainability Appraisal Reports prepared and published during the Regulation 18 stage of the plan process.

Stage D Consultation on the draft Local Plan and SA Report

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

The Statutory Environmental Bodies (SEBs)

- 3.19. Regulation 4 of the SEA Regulations defines certain organisations with environmental responsibilities as consultation bodies. In England the consultation bodies (or statutory environmental bodies) for the purposes of the SA are the Environment Agency, Historic England and Natural England.

Consultation on the SA/SEA Scoping Report

- 3.20. As noted earlier in this report, Rother District Council worked jointly with Hastings Borough Council to prepare a joint SA/SEA Scoping Report for their respective Local Plans. The statutory environmental bodies were consulted on the draft SA/SEA Scoping Report, from 17 April to 29 May 2020.

- 3.21. Whilst not legally required to, the Council also invited comments on the draft SA/SEA Scoping Report from selected organisations and stakeholders, as listed below:

- East Sussex County Council;
- East Sussex NHS Clinical Commission Group;
- Sport England;
- Highways England;
- Marine Management Organisation;
- South East Coastal Group; and
- Neighbouring authorities: Tunbridge Wells Borough Council, Ashford Borough Council, Wealden District Council and Folkestone and Hythe District Council.

- 3.22. Appendix A to the SA/SEA Scoping Report provides details of the responses received to the consultation. In response to feedback received the SA Framework was amended, the updated version of which was included in the final SA/SEA Scoping Report (2021).¹³

¹³ The SA/SEA Scoping Report was made available on the Council's website in Summer 2020.

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

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

➤ Regulation 18 consultation on the draft Rother Local Plan (April to July 2024)

- 3.26. The Council carried out a Regulation 18 stage public consultation on the draft Rother Local Plan 2020-2040, from 30 April to 23 July 2024. During that time, the Council also published and consulted on a corresponding Interim Sustainability Appraisal (including a Non-Technical Summary) (April 2024). A Habitats Regulations Assessment Screening Report was also published for consultation.
- 3.27. Representations received to the consultation on the Interim Sustainability Appraisal report are set out in **Appendix 2** of this report.

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

- 3.28. The Council has published for a further Regulation 18 stage consultation, the draft Rother Local Plan – Development Strategy and Site Allocations document. The associated Interim Sustainability Appraisal report (January 2026) has also been published for public consultation. The Council is inviting the public to submit representations on these documents.

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

- 3.29. The final Sustainability Appraisal Report will be prepared and published for consultation at the Regulation 19 stage of the plan process, as set out above.

Stage E Monitoring

- 3.30. The SEA Regulations set out requirements with respect to monitoring of the implementation of the Local Plan. Specifically, the requirement is monitor “the significant environmental effects of the implementation of each plan or program with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake remedial action”¹⁴.
- 3.31. Indicators will be established to monitor the implementation of the Local Plan in due course, informed by further work on the SA. The final SA Report (published at the Regulation 19 stage of the plan process) will include suggested indicators for monitoring, in line with the statutory requirements.
- 3.32. It is noted that the Council currently monitors the implementation of the extant Local Plan through the Authority Monitoring Report (AMR), which it is required to prepare at least annually. The Council will explore opportunities to integrate SA monitoring of the new Local Plan through the AMR process.

Health Impact Assessment

- 3.33. As noted above, the Council’s approach to SA integrates a Health Impact Assessment (HIA). The Council has worked closely with the Healthy Places team at East Sussex County Council on the SA approach. A key focus nationally, and supported at county level, is the need to assess the specific health impacts of proposed policies through a Health Impact Assessment. This builds on elements of health and wellbeing that are assessed as part of the SA process itself, but it has been considered appropriate to undertake an additional HIA assessment in two parts, as set out below and detailed in the figure below:
- Part 1: Screening – to assess if there are clear health and wellbeing impacts of the proposed policies
 - Part 2: Full HRA criteria – detail what the impacts will be, considering the positive and negative and long term and temporary impacts.
- 3.34. This HIA process helps to ensure that health and wellbeing considerations are assessed widely across the Local Plan, and that linked benefits can be maximised. The 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.

¹⁴ SEA Regulations, Regulation 17(1).

Figure 8: Template HIA for the screening and assessment of Local Plan policies

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

Limitations and difficulties encountered

- 3.35. It is a requirement of the SEA Regulations that, when providing a description of how the assessment was undertaken, information is provided on any difficulties encountered in compiling the required information.
- 3.36. One of the key challenges in preparing the SA is that there is inevitably an element of 'subjectivity' brought into the assessment of reasonable alternatives for the Local Plan approaches and policies, as part of the professional judgements taken by those preparing the work. The SA Framework provides tools (such as clearly articulated objectives and guiding questions) to help ensure that the assessment can be made as 'objective' and transparent as reasonably possible. To further address this issue for the SA of the proposed site allocations and reasonable alternatives, the Council has prepared a bespoke 'template' to ensure a consistent approach to the site assessments, drawing extensively

on Geographical Information System (GIS) mapping. The methodology is discussed in further detail in Chapter 5 of this report.

- 3.37. A limitation in undertaking the site assessments using the 'template', was that some of the SA objectives were screened out, and therefore not all 20 SA objectives were scored in detail on the individual site assessments. There were two main reasons for this screening. First, in some cases, there are 'development management policies' or Building Regulations which deal with planning matters associated with an objective (such as for water efficiency or safety/security), so the site assessment is negligible. Second, in other cases, it is difficult to make meaningful assessments or comparisons between proposed site allocations for some objectives (such as reducing poverty or access to education/training), as these are captured by other Local Plan policies. Further details of the reasons for screening out SA objectives are included in the template at Appendix 3.
- 3.38. Another key challenge in preparing the SA is to assess proposed policy approaches or options independently, and in the absence of how they might function in combination with other policies in the Local Plan. For example, site allocations (proposed sites for new development) may by themselves have potential negative impacts on some of the SA objectives; however, these impacts can be avoided or mitigated through other policies in the plan, such as 'development management' style policies or indeed site-specific development requirements or guidelines. This SA broadly takes a 'policy off' approach to the SA in the first instance, so to consider policy options by themselves and independent of other policies, plans or programmes. This is then supplemented by a more rounded assessment of cumulative and synergistic impacts, in accordance with the legal requirements. Mitigation measures can then be recommended by the SA, which can be considered during the plan-making process, and as part of the iterative process of SA.
- 3.39. The SA takes account of and is based on the available information at the time it is being prepared. It is acknowledged that the collection and analysis of baseline data is a continual process, as information can be updated or change on a regular basis. The approach taken for this SA is to consider the reports collectively, with focussed updates to baseline information and cross-referencing of earlier reports (such as the SA Scoping Report and Interim SA Reports). This helps to avoid unnecessary duplication of information.
- 3.40. The amount of information included as the baseline needs to be proportionate and relevant to the exercise, and in line with the legal requirements. It is acknowledged that there may be instances where there are data gaps on particular topic areas, or some baseline information may not be cited or the latest available. The Council will seek to address this issue, and rectify instances where possible, through public consultation on the SA including with the statutory environmental bodies.

Chapter 4 Appraisal of the Development Strategy options

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

Background

- 4.1. The NPPF intends for the planning system to be genuinely plan-led. Local plans, therefore, should provide “a positive vision for the future of an area, and a framework for meeting housing needs and addressing other economic, social and environmental priorities”.¹⁵ The Development Strategy for the Local Plan sets out how this will be achieved for the district, including approaches to coordinating and carefully managing new development across Rother.
- 4.2. Furthermore, the NPPF stipulates that the national ‘standard method’ should be used to assess the minimum amount of housing required in an area. This takes existing housing stock estimates and applies an upward adjustment based on the affordability characteristics of the area.¹⁶
- 4.3. The Development Strategy is set in the context of Rother’s development needs and how these will be addressed. It responds to the number of new homes and amount of new employment floorspace that is expected to come forward over the plan period. The Development Strategy also sets out the approach to distributing this growth to ensure it happens in a sustainable way, including by identifying the main locations where new development and supporting infrastructure will be directed.
- 4.4. At the time of the first Regulation 18 consultation on the draft Rother Local Plan in summer 2024, the standard method yielded a figure for the district of 733 net new homes per year. The NPPF was then updated in December 2024 along with changes to the standard method. It now yields a figure for the district of 912 net new homes per year. Over the 17-year plan period of 2025-2042, this amounts to a need of 15,504 net new homes. The annual standard method housing need figure is subject to change on a yearly basis, and the Council will therefore monitor any updates to the standard method and its outputs as work on the plan progresses.
- 4.5. The district’s needs for economic development have also been identified by the Council through its evidence base. The Housing and Economic Development Needs Assessment (2024) indicates a need of circa 24 hectares, or 74,189 square metres, of employment floorspace over the period 2020-2040. The Rother Retail and Town Centre Uses Study (2023) indicates that there is very little need for retail floorspace at the district level. These studies will be subject to review and potential updating to reflect needs arising during the updated plan period for the Rother Local Plan, as well as to take account of new baseline information.

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

¹⁶ National Planning Policy Framework, December 2024, paragraph 62.

Formulating the Development Strategy Options

- 4.6. From the early stage of the plan process the Council has considered a wide range of options, or **reasonable alternatives**, for the Development Strategy. Further details on the process and considerations for formulating these options are set out the Development Strategy Background Paper (2024), which forms part of the Local Plan evidence base, and should be referred to for further information. The following section provides a summary of the paper.
- 4.7. As part of the preparation of the draft Local Plan (2024), the formulation of Development Strategy options was undertaken by the Council with reference to the evidence base, and considered the following factors:
- The existing distribution of settlements across the district and their scale and importance;
 - The district's transport network and the connectivity and interaction between settlements in relation to accessing services and facilities;
 - The development potential outside the High Weald National Landscape;
 - Opportunities for new settlements, or significant extensions to existing settlements; and
 - Opportunities for development on the edge of the district boundary where it is close or adjacent to other settlements.
- 4.8. The starting point for considering options was the existing distribution of settlements across the district. On this basis, there was potential scope for a Development Strategy linked to the current size, form and function of each settlement and their potential to grow in line with past trends. This led to two 'in-principle' options which based on directing proportional growth:
- i. According to the existing population of settlements – in this way existing large settlements would continue to grow at higher rates, and smaller settlements would only have limited growth; and
 - ii. According to the form and function of each settlement – through establishing a hierarchy where each settlement is defined as a large town, smaller town, larger village, etc. and the level of growth is based on the hierarchy.
- 4.9. The next set of options related to the interaction of communities between settlements across the district. These options were premised on the proximity of settlements to neighbouring ones, along with their relationships in terms of provision of services and facilities and transport networks/connections (including potential improvements to transport). Two 'in-principle' options were set out, as follows:

- i. Village Clusters – enhanced connections between existing villages to create clusters of connected settlements, supported by growth. In particular, two potential clusters centred around Rye and Battle; and
 - ii. Radial Settlement Connections to Bexhill and Hastings – focussing growth in settlements that are served radially by the three larger towns of Bexhill, Battle and Hastings, with improved sustainable transport connections;
- 4.10. The next consideration centred on the growth of existing settlements through brownfield land development and intensification, together with greenfield development and growth at the edge of the existing settlements. Specifically, this considered the opportunities for significant growth in the North and West Bexhill area, as Bexhill is the district’s largest settlement and a key area of search. This provided for four ‘in-principle’ options, as follows:
- i. Sustainable Settlement Growth – focussing new development on the edge of identified sustainable settlements (informed by the Council’s Settlement Study), and extending settlement boundaries where appropriate;
 - ii. Bexhill Greenfield Growth – focussing development in sustainable locations on the edge of North and West Bexhill, with sub-options to take this forward both with and without a new multimodal between the A259 and the A2691 (Haven Brook Avenue);
 - iii. Hastings Fringes Urban Growth – focussing development on the edge of Hastings (on land within Rother District), adjoining the built-up boundary; and
 - iv. Brownfield intensification and redevelopment – directing development within the existing areas of built form of sustainable settlements, primarily on brownfield land and at higher densities.
- 4.11. Consideration was also given to the opportunities for new development along transport corridors, or in areas located near to sustainable transport options, such as train stations and bus routes. This provided for two ‘in-principle’ options, as follows:
- i. Growth in settlements with train stations or sustainable transport alternatives – focussing development within locations and settlements close to train stations that act as a sustainable transport hub, and linkage to bus services;
 - ii. A21 Corridor growth - focussing development along the A21 within an identified corridor of settlements, with opportunities for sustainable growth, together with enhanced provision of sustainable travel by enhanced bus services and cycling provision along the corridor.
- 4.12. Finally, two ‘in-principle’ options were considered for development outside of the defined High Weald National Landscape (formerly referred to as Area of Outstanding Natural Beauty), as follows:

- i. Development focused outside the National Landscape - concentrate new development only in locations outside the National Landscape, which necessarily comprised a southern, coastal focused strategy centred around Bexhill and Rye;
 - ii. New rural settlement(s) – An individual or a number of new settlements with their own facilities and services and necessary infrastructure.
- 4.13. The options listed above were considered to inform the Development Strategy included in the draft Local Plan (2024). At that time, the Council first considered these ‘in-principle’ options on their own merits, in isolation of the other options. However, it was also recognised it would be appropriate to also consider synergies between options and the opportunities for them to be combined to form the most appropriate and sustainable strategy for the district.
- 4.14. It is important to note that the Council was clear that some of the options required further understanding and consideration of findings from the HELAA process. This was particularly as some options could only be feasibly delivered with a sufficient supply and land and sites that were “suitable, available, and achievable”. Nevertheless, at the early stage of the plan process, it was considered appropriate to identify and explore the merits of these options and to assess them through the SA, whilst recognising that further work on the HELAA would be undertaken.

Appraisal of the Development Strategy options

- 4.15. The SA of the initial Development Strategy options is set out in Figure 9 and Figure 10 below. This has been duplicated from the Interim Sustainability Appraisal (2024). It is included here for information and to aid reading of the subsequent section of this report, which deals with the SA of the second draft Rother Local Plan – Development Strategy and Site Allocations (2026), including additional options considered following consultation on the draft Rother Local Plan (2024).
- 4.16. The appraisal of the initial options informed the Council’s selection of a ‘preferred option’ for the Development Strategy, which comprised a combination of the options. The preferred option was then set out in the draft Rother Local Plan (2024) as the “Proposed Strategy: Overall Spatial Development Strategy” and subject to public consultation.
- 4.17. The preferred option comprised the following options (with details of the corresponding reference numbers for the options set out in the tables below):
- Bexhill Greenfield Growth (without new multi-modal transport corridor, to be confirmed) (SDO3A);
 - Radial Settlement Network from the main urban areas of Bexhill and Hastings (SDO2);

- Village Clusters with growth in settlements with train stations or sustainable transport alternatives (SDO1, SDO11)¹⁷;
- Sustainable settlement growth, with focus along the A21 Corridor (SDO4, SDO10);
- Hastings fringes urban growth (SDO5); and
- Brownfield Intensification and Redevelopment (SDO6).

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

Except from Interim Sustainability Appraisal (2024)

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

¹⁷ Note that the draft Rother Local Plan (2024) did not indicate that option SD11 was taken forward as a preferred approach due to an editorial error.

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

Spatial Development Options	Description/Vision	1 Air pollution	2 Biodiversity	3 Climate Change	4 Water Consumption	5 Flooding	6 Coastal Erosion	7 Health and Well-being	8 Housing	9 Accessibility to services	10 Safe Environments	11 Historic Environment	12 Pollution	13 Waste and Recycling	14 Water Pollution	15 Natural Landscape	16 Economic Performance	17 Employment Levels	18 Deprivation	19 Skills and Education	20 Transport	Score	Summary
SDO1: Village Clusters	A cluster of villages that interact with each other together to form a sustainable focus for development. Two identified clusters centred around Rye and Battle as key transport interchanges	--	+	-	-	+	0	0	++	++	+	0	0	-	0	+	++	+	+	+	+	9	Overall positive strategy for rural locations. Concerns over potential heritage and protected landscape impacts and the practicalities of sustainable transport options between settlements.
SDO2: Radial Settlement Network from the main urban areas of Bexhill and Hastings	A radial network of settlements connected to the larger urban areas of Bexhill and Hastings and the smaller settlements of Catsfield, Crowhurst, Netherfield, Sedlescombe, Westfield, Guestling, Icklesham, Pett and Fairlight, to provide a sustainable focus for development	--	+	-	-	+	0	0	++	++	+	0	0	-	0	0	++	+	+	+	0	7	Positive overall strategy, however it could encourage more car travel to the larger urban areas. Similar impacts to the Town/Village network cluster strategy, but more neutral impacts, making it score lower overall.
SDO3A: Bexhill Greenfield Growth Option 1 –within existing road network	Bring forward development in sustainable locations on the edge of West Bexhill that can be accessed and developed within the existing road network.	--	+	-	-	+	0	0	++	++	++	+	0	-	0	0	+	++	+	++	0	10	Strong positive strategy that seeks to locate development where sustainability impacts are the most positive, centred around the District's largest settlement.
SDO3B: Bexhill Greenfield Growth Option 2 –with new multi-modal transport corridor	Bring forward a higher level of growth through a new sustainable community that is masterplanned, accessed and served by a new multi-modal transport corridor between the A259 (Barnhorn Road) and A2691 (Haven Brook Avenue) A.	--	+	0	-	+	0	+	++	++	++	+	0	-	0	0	++	++	++	++	++	16	Strong positive strategy that seeks to focus development and a new transport corridor in a masterplanned way where sustainability impacts are most positive, centred around the District's largest settlement.
SDO4: Sustainable settlement extensions	Prioritise new development on the edge of sustainable settlements, providing major development and extending settlement boundaries where appropriate	--	+	-	-	+	0	0	++	++	++	0	0	-	0	0	++	+	+	+	0	8	Sensitive development on the edge of settlements is generally positive, although some settlements will be more sustainable than others, and others may have physical constraints.

Spatial Development Options	Description/Vision	1 Air pollution	2 Biodiversity	3 Climate Change	4 Water Consumption	5 Flooding	6 Coastal Erosion	7 Health and Well-being	8 Housing	9 Accessibility to services	10 Safe Environments	11 Historic Environment	12 Pollution	13 Waste and Recycling	14 Water Pollution	15 Natural Landscape	16 Economic Performance	17 Employment Levels	18 Deprivation	19 Skills and Education	20 Transport	Score	Summary
SD05: Hastings Fringes Urban growth	Prioritise development on the edge of Hastings in sustainable locations, which may provide opportunity for joint delivery of sites in both Hastings and Rother	--	+	-	-	+	0	0	++	++	++	0	0	-	0	0	++	++	+	+	0	9	Positive strategy to locate development on the edge of Hastings where access to services and facilities is good. Some physical constraints would impact delivery.
SD06: Brownfield Intensification and redevelopment	Focus development within the existing areas of built form of the settlements, focusing on brownfield development and higher densities	--	++	0	-	++	0	0	+	++	++	0	0	-	0	++	++	++	+	+	+	14	Strong positive strategy, with no major environmental impacts, as development can be contained within the existing urban area, primarily on brownfield sites.
SD07: New rural settlement(s)	Opportunity for (a) standalone settlement(s), with the provision of facilities and services to ensure sustainability	--	+	-	-	+	0	0	++	++	++	+	0	-	0	-	++	++	0	+	0	7	Would create an environmental impact, but an opportunity to provide a sustainably planned settlement which is connected to the wider network of settlements.
SD08: Proportional growth across the District (by population)	In principle, distribution of development proportionally based on the current population of each settlement (does not take account of constraints)	--	+	-	-	+	0	0	++	++	+	0	0	-	0	0	+	+	+	+	0	6	This option would exacerbate the current situation as growth would be proportional, would not necessarily proactively address sustainability issues.
SD09: Proportional growth by settlement form and function	In principle, distribution of development proportionally based on the order of the settlement in the network of settlements (service centre or hierarchy approach which does not take account of constraints)	--	+	-	-	+	0	+	++	++	+	0	0	-	0	0	+	+	+	+	0	7	This option would exacerbate the current situation as growth would be proportional based on service centres and hierarchy approach. Some settlements would not benefit and would have no further growth.
SD10: A21 Corridor growth, with focus on sustainable transport corridors	Focus development along the A21 within an identified corridor of settlements, with opportunities for extensions. Provide opportunities for sustainable travel through enhanced bus services and cycling provision along this corridor.	--	+	-	-	+	0	0	++	++	++	0	0	-	0	0	++	++	+	++	-	9	A positive strategy to allow for development to directly access the A21 corridor for transport movement, although this could have considerable environmental impacts. Opportunity to create a sustainable multi-modal corridor.

Spatial Development Options	Description/Vision	1 Air pollution	2 Biodiversity	3 Climate Change	4 Water Consumption	5 Flooding	6 Coastal Erosion	7 Health and Well-being	8 Housing	9 Accessibility to services	10 Safe Environments	11 Historic Environment	12 Pollution	13 Waste and Recycling	14 Water Pollution	15 Natural Landscape	16 Economic Performance	17 Employment Levels	18 Deprivation	19 Skills and Education	20 Transport	Score	Summary
SD11: Growth in settlements with railway stations or sustainable transport alternatives	Focus development in settlements served by railway stations or sustainable transport alternatives for accessibility	--	+	0	-	+	0	0	++	++	++	0	0	-	0	0	++	++	+	++	++	13	A strong sustainable strategy, although growth may be limited by physical constraints. Some settlements would need to improve their level of services and facilities to cater for a larger population.
SD12: Development focused outside the AONB	Concentrate new development in all locations outside the High Weald AONB, resulting in a southern focused development strategy around Bexhill and Rye	--	++	-	-	-	0	0	+	+	+	0	0	-	0	+	+	+	+	+	0	4	Development is limited to small areas of the District which are impacted by other environmental constraints such as flooding and would not support housing and employment land needs within the AONB

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

Spatial Development Strategy Options	Score	1. Does this have a 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			☑	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 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			☑	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.

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
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.
SDO2: Radial Settlement Network from the Main Urban areas of Bexhill and Hastings ¹⁸	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.

¹⁸ Spatial Development Option reference SDO2 was erroneously shaded 'red' in the Interim Sustainability Appraisal (2024) and should have been shaded 'green' as an option taken forward. This has been rectified in the table shown above.

Spatial Development Strategy Options	Score	1. Does this have a <u>significant</u> effect on the SA objective(s), whether positive or negative? State Y/N	2. Is the likely Impact? Negative (-1)	2. Is the likely Impact? Neutral (0)	2. Is the likely Impact? Positive (1)	3. Is this a temporary or permanent Impact? State T or P	4. Is this a short term or long term impact? State ST or LT	5. Are there synergies between other <u>policies</u> (or options) which might amplify the effect? State Y or N	6. Commentary/Notes Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score
SD07: New Rural Settlements	7	No – not a significant impact			<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.
SD09: 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.
SD08: 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.
SD012: 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.

SA of the additional and revised Development Strategy Options

Background

- 4.19. There were a wide range of representations made on the draft Rother Local Plan (2024) during the first Regulation 18 consultation. The Council has prepared an Interim Consultation Statement summarising the comments received. A full Consultation Statement will be produced and published at the Regulation 19 stage of the plan process, in accordance with the statutory requirements.
- 4.20. In terms of the proposals for the Development Strategy, and other related matters covered by the plan, many representations expressed concerns about the level of growth being planned for in Rother and the harmful impact this may have on the countryside, including the National Landscape, and on the environment. The Council has acknowledged the challenge posed by the national policy requirements to significantly boost housing supply, (particularly to meet the identified Local Housing Need as set out by the NPPF and the standard method for calculating this figure) but stresses that it must plan positively to do so. It has therefore considered a high number of options for the Development Strategy and assessed these for their overall sustainability, as set out in the Interim Sustainability Appraisal (2024).
- 4.21. Through the public consultation, several additional options for the Development Strategy have been identified, which have not previously been subject to SA. These options are discussed further below. They have been assessed as part of the iterative SA process.

A21 Corridor option

- 4.22. At the first Regulation 18 consultation, an 'A21 growth corridor' option was considered and taken forward as part of the preferred Development Strategy. This option provided for development along the A21 trunk road within an identified corridor of settlements, together with a sustainable transport corridor (including improved sustainable travel options such as bus routes, cycling and walking infrastructure). Representations to the consultation, including from statutory bodies, raised concerns with the deliverability of this option due to a lack of identified funding and justification for potential works to the Strategic Road Network, and need for further cross-boundary discussions with relevant authorities.
- 4.23. The latest HELAA (2026) findings indicate that there are potential development sites in some of the larger settlements along the A21 corridor that can assist in meeting Rother's identified development needs. As such, the Council considers that there is still merit in exploring an option for new development in this area. Rather than wholesale growth along the corridor, the revised option is for focussed development only within and on the edges of those larger settlements which already have a level of services and facilities and offer existing opportunities for sustainable travel (including improvements to bus services, cycling and walking infrastructure). A revised A21 growth corridor option has therefore been prepared, as set out below:

New spatial development option	Description/ vision	Focus areas for growth in settlements/ areas of built form
SDO13 – A21 corridor growth, focussed within and around existing larger settlements.	Development along the A21 road corridor, focussed within and around existing settlements, where there is a reasonable level of local services.	The following settlement areas: Robertsbridge/Salehurst, Hurst Green, and Flimwell.

Strategic Gap option

4.24. It was suggested through the first Regulation 18 public consultation that opportunities should be explored to develop within the district's strategic gaps. This option had not previously been considered for the Development Strategy (albeit there was consideration for new development in the countryside and at the edges of existing settlements). Therefore, the Council has prepared an additional option, as set out below:

New spatial development option	Description/ vision	Focus areas for growth in settlements/ areas of built form
SDO14 – Development within the strategic gaps	Significant new development within identified strategic gaps, with new or improved linkages to the nearest settlements.	<p>The strategic gaps identified through the adopted Development and Site Allocations Local Plan (2019):</p> <ul style="list-style-type: none"> • Bexhill and Hastings/St Leonards – gap along the A259 corridor. • Crowhurst and Hastings/St Leonards – gap between the settlements, including between edge of Crowhurst to Hastings-London railway. • Battle and Hastings – gap between settlements, including edge of Telham and Breadsell Farm. • Fairlight and Hastings – boundary of Hastings borough and edge of Fairlight Cove. • Rye and Rye Harbour - between Rye citadel and Harbour Road industrial area/Rye Harbour village.

SA of the options

4.25. The refined and additional Development Strategy Options - A21 Corridor option (reference SDO13) and Strategic Gap option (reference SDO14) respectively - have been assessed using the SA Framework, and findings are set out below.

Figure 11: Assessment of revised and additional Development Strategy Options

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

Figure 12: Summary of revised and additional Development Strategy Options

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

Spatial Development Strategy Options	Score	1. Does this have a <u>significant</u> effect on the SA objective(s), whether positive or negative? State Y/N	2. Is the likely Impact? Negative (-1)	2. Is the likely Impact? Neutral (0)	2. Is the likely Impact? Positive (1)	3. Is this a temporary or permanent Impact? State T or P	4. Is this a short term or long term impact? State ST or LT	5. Are there synergies between other <u>policies</u> (or options) which might amplify the effect? State Y or N	6. Commentary/Notes Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score
								corridors in proximity to existing strategic gaps	required in providing more effective sustainable travel alternatives, to ensure sustainable linkages with development and nearby settlements.

Discussion on the revised and additional options

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

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

Background

- 4.30. The national Planning Policy for Traveller Sites (PPTS, updated 2024) sets out the Government's planning policy. Paragraphs 4 and 9 of the PPTS confirm that local planning authorities should make their own assessments of accommodation needs and, through Local Plans, set pitch targets for gypsies and travellers, and plot targets for travelling showpeople, which address the likely permanent and transit site accommodation needs

of travellers in their area, working collaboratively with neighbouring LPAs. Paragraph 10 requires LPAs to identify, and update annually, a supply of specific, deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets; and a supply of specific, developable sites or broad locations for years 6-10, and where possible, for years 11-15.

4.31. Rother District Council has worked with the other East Sussex local planning authorities to commission a joint Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (GTAA) (2022). This study provides a summary of permanent and transit accommodation needs for gypsies, travellers and travelling showpeople across the county, and also across each district and borough, over the period 2021 to 2040. An update to the East Sussex GTAA will be completed in 2026, to give an up-to-date picture of need to the end of the plan period.

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

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

Formulating the Development Strategy options

4.33. The first draft Rother Local Plan 2020-2040 set out the strategic approach to accommodation needs of gypsies, travellers and travelling showpeople, which was set out in the Development Strategy section of the plan. This consists of two strategic options, or **reasonable alternatives**, which are to be considered in tandem, as set out in Figure 13 below.

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

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

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

4.35. It is noted that since the first Regulation 18 consultation on the draft Rother Local Plan (2024), an East Sussex wide group has been established to ensure collaborative work on coordinating and planning for the cross-boundary strategic planning issues in relation to provision of gypsy, traveller and travelling showpeople accommodation. A Memorandum of Understanding has been prepared and, at the time of writing, due to be formalised. Joint work has included a county-wide call for sites, and agreement on site assessment criteria. This is largely in line with draft Rother Local Plan, Policy HOU11, and therefore broadly consistent with the options set out above.

SA of the options

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

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

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

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

SA of the Development Strategy Preferred Approach for the draft Local Plan

4.37. The following figure sets out the SA of the Development Strategy preferred approach for the draft Local Plan (2026), which includes the overall Development Strategy and the strategy for Gypsies, Travellers and Travelling Showpeople.

4.38. It is important to reiterate that the assessment below is based on a ‘policy off’ approach, as a baseline for considering the likely effects of the strategy. There are ‘policy on’ approaches that can be included in the Local Plan to help avoid or mitigate negative impacts of the Development Strategy, or to improve positive effects. For example, mitigation measures can be addressed by additional Local Plan policies, such as ‘development management’ or ‘site allocation’ policies.

Figure 15: SA of the Development Strategy Preferred Approach, with Commentary

SA Objective	Score	Commentary
1. Reduce air pollution from transport and development and improve air quality.	--	The strategy seeks to facilitate a significant increase in development across the district. This will result in an associated increase in population and a greater volume of vehicles, which is likely to increase air pollution from transport. Whilst locating new development within and around existing settlements may enable and support modal shift; a level of car use/reliance is expected given the largely rural nature of the district and existing public transport infrastructure provision and services. There are currently no Air Quality Management Areas in the district, which reflects a relatively positive situation in this respect.
2. Biodiversity is protected, conserved and enhanced.	O	The strategy seeks to protect internationally and nationally designated habitats sites and to locate development away from them. The strategy provides for some new development in the National Landscape, which includes biodiversity, however this is on a limited scale. At a local site level, the introduction of development on and around greenfield land may have adverse effects on biodiversity unless appropriately mitigated. It is noted that there is a mandatory requirement for biodiversity net gain in England for some types of new development.
3. The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)	-	The strategy seeks to facilitate a significant increase in development across the district. This will likely result in an associated increase in emissions arising from the construction and operation of new development as well as a greater volume of vehicles, both from residential and commercial uses. Focussing new development within and around Bexhill can provide opportunities for decentralised energy networks. Measures can be taken to improve the energy efficiency of buildings and to reduce emissions in their operation, however this is not dealt with through the development strategy.

4. Minimise water consumption.	-	The strategy seeks to facilitate a significant increase in development across the district. This will result in an associated increase in population, which is likely to lead to additional water consumption, both from residential and commercial uses.
5. Manage and reduce the risk of flooding (fluvial, tidal and surface water), now and in the future, and increase resilience to the wider effects of climate change.	-	Parts of Rother are at risk of tidal flooding given its coastal location. The majority of the district is located in Flood Zone 1 and therefore not at risk of fluvial flooding, however there are areas located in Flood Zones 2 and 3 at greater risk (particularly to the east in and around Rye). There is surface water flood risk across the district, but this is localised and concentrated along topographical flow paths of existing watercourses, dry valleys or roads. No formal critical drainage areas have been identified within the district however, the Fairlight/Pett area is of concern with regard to surface water drainage. The majority of the district is at a negligible risk of groundwater flooding. Overall, the development strategy will result in the introduction of new development in locations at different levels of risk of flooding from various sources. However, it is acknowledged that flood risk will largely be dealt with through site specific considerations, both through the plan preparation (particularly site allocations) and the development management process.
6. The risk of coastal erosion is managed and reduced, now and in the future.	O	The district is bounded by the English Channel to the south, with the coastline at risk of tidal flooding. Tidal flooding has been recorded in Rye Harbour and Camber due to the overtopping of defences, and coastal flood risk will potentially increase where coastal erosion threatens the stability of tidal flood defences. The development strategy broadly locates development away from the coastline, and flood defences are dealt with in the local plan by infrastructure requirements rather than the development strategy.
7. The health and well-being of the population is improved and inequalities in health are reduced.	O	It is uncertain how the development strategy will by itself, in isolation of other Local Plan policies, impact on the overall health and wellbeing of the population and addressing inequalities. The strategy seeks to locate new development in areas where there is relatively good access to services and facilities, along with open space. However, additional demands will arise from a growing population, and an appropriate level of infrastructure will be required. The strategy will help to facilitate new housing and commercial development, which can help to address the determinants of health and wellbeing and inequality.
8. More opportunities are provided for everyone to in a suitable home to meet their needs.	++	The development strategy seeks to facilitate a significant increase in development across the district, particularly for housing. This is likely to provide more opportunities for people to access housing. Whilst the amount of development is not expected to meet the Government's Local Housing Need target in full, the strategy will nonetheless provide for a significant uplift in housing, well above and beyond the levels currently provided for in the extant Local Plan.

9. All sectors of the community have improved accessibility to services, facilities, jobs, and social and cultural opportunities.	++	The development strategy seeks to locate significant new development, particularly residential uses, in sustainable locations informed by the Settlement Study. Locating new development within and in proximity to existing towns and other settlements where there are existing services, facilities and employment opportunities along with comparably better public transport options, is likely to result in positive effects on this objective.
10. Safe and secure environments are created and there is a reduction in crime and fear of crime.	+	The strategy seeks to locate significant new development in sustainable locations informed by the Settlement Study. This will help to ensure developments are not isolated and can take advantage of or integrate well with the existing public realm. This may also support the provision of essential services, such as police and emergency services, in terms of the geographic scope of coverage.
11. Historic environment/ townscape is protected, enhanced and made more accessible.	O	Overall effects are uncertain, as impacts on the significance of heritage assets will largely be determined on a site-by-site basis. The development strategy seeks to include new development in existing settlements, where there are heritage assets including conservation areas and listed buildings.
12. The risk of pollution to land and soils is reduced and quality is improved.	O	The strategy seeks to prioritise the re-use of brownfield land where possible and this can assist with land remediation and improving ground conditions. However, the strategy will also inevitably require that some development on greenfield land is enabled, which can create a risk to ground conditions unless appropriately mitigated.
13. Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced.	-	The strategy seeks to facilitate a significant increase in development across the district. This will result in an associated increase in population and activities, which is likely to lead to greater amounts of waste being generated compared to the current situation. Measures can be taken to promote and enable minimising and recycling/re-use of waste, but this not dealt with by the development strategy.
14. The risk of pollution to water is reduced and water quality is improved.	O	The development strategy seeks to facilitate a significant increase in development across the district. This will result in an associated increase in population and activities, which may lead to greater risk of pollution to water unless there is sufficient infrastructure in place to manage water resources, including wastewater. The Pevensey Levels hydrological catchment has particular drainage requirements, in relation to water quality concerns in the Pevensey Levels Ramsar site. Water management standards can be set in the Local Plan, but this is not dealt with by the development strategy.
15. Ensure that Parks, gardens and countryside are protected, enhanced	-	Whilst the development strategy seeks to prioritise development within and around existing settlements and urban areas, where there are opportunities for the re-use of brownfield land, although it will inevitably also result in new development coming forward within the countryside, including the National Landscape; and may therefore to

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

Figure 16: SA of the Development Strategy Preferred Approach (including gypsies, travellers and travelling showpeople)

Spatial Development Options	Description/Vision	1 Air pollution	2 Biodiversity	3 Climate Change	4 Water Consumption	5 Flooding	6 Coastal Erosion	7 Health and Well-being	8 Housing	9 Accessibility to services	10 Safe Environments	11 Historic Environment	12 Pollution	13 Waste and Recycling	14 Water Pollution	15 Natural Landscape	16 Economic Performance	17 Employment Levels	18 Deprivation	19 Skills and Education	20 Transport	Score	Summary
SDO-LP: Local Plan preferred approach	<p>Growth, new development and supporting infrastructure directed to the following broad locations:</p> <ul style="list-style-type: none"> West and North Bexhill; The towns of Battle and Rye, along with the clusters of villages based around them; Settlements on radial routes connected to the main urban areas of Bexhill and Hastings Hastings Fringes Urban intensification and redevelopment across the district in appropriate and sustainable brownfield site locations; Sensitive development in other rural settlements of the district; and Growth along the A21 corridor, focussed within and around existing larger settlements. <p>This is a combined option comprising options SDO1, SDO2, SDO3A, SDO4, SDO5, SDO6, SDO11, SDO13, SDO-GTTS1 and SDO-GTTS2.</p>	--	0	-	-	-	0	0	++	++	+	0	0	-	0	-	++	++	+	++	0	5	<p>An overall positive strategy to focus growth and appropriately intensify development within and around existing settlements, and sustainable locations informed by the Settlement Study, together with focussed growth along the A21 corridor and settlements on radial routes connected to the main urban areas of Bexhill and Hastings. The strategy broadly focusses new development in areas that have comparatively good transport connections, including railway stations, given existing provision in the district, and that are or can be supported by local services, facilities and other supporting infrastructure. Whilst some development would take place in the countryside and the National Landscape, the strategy broadly seeks to direct new development away from these areas, as well as protected nature sites.</p>

Figure 17: Summary of Development Strategy Preferred Approach

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

Health Impact Assessment

Figure 18: Health Impact Assessment of Development Strategy Preferred Approach (including gypsies, travellers and travelling showpeople)

HIA Screening	Proposed Development Strategy (including proposed sites and distribution of development across the 5 sub-areas)	Proposed Strategy for Gypsies, Travellers and Travelling Showpeople
Will the policy have a direct impact on health, mental health and wellbeing?	Yes	Yes
Will the policy have an impact on social, economic and environmental living conditions that would indirectly affect health?	Yes	Yes
Will the policy affect an individual’s ability to improve their own health and wellbeing?	Yes	Yes
Will there be a change in demand for or access to health and social care services?	Yes	Yes
Full HIA Criteria	Proposed Development Strategy	Proposed Strategy for Gypsies, Travellers and Travelling Showpeople
What are the direct impacts on health, mental health and wellbeing? (e.g. ill health, social exclusion, isolation, non-participation, safety)	Ability for people to live nearer to health facilities, supported by open space and infrastructure that will enable people to live well. Development spread across the district, therefore growth of facilities and infrastructure supported across the whole district. Minimises isolation in rural locations and allows community cohesion and living well locally.	The provision of an appropriate amount of pitches over the lifetime of the Local Plan will ensure that the needs of this section of community can me met, supporting their overall health and wellbeing and integration into society and ability to access health care needs.

What are the indirect impacts on health, mental health and wellbeing? (e.g. housing, transport, child development, education, employment opportunities, green space/nature, accessibility, air/noise/light quality and climate change adaption)	Linked employment opportunities and better quality of life. This leads to overall better mental health and greater participation in community activities.	Linked employment opportunities and better quality of life. This leads to overall better mental health and greater participation in community activities.
What are the opportunities for self-improvement? (e.g. ability to be physically active, choose healthy food, access to services/employment/education)	Access to services and facilities will be improved, with supporting infrastructure, such as education and sustainable transport infrastructure.	Access to services and facilities will be improved, with supporting infrastructure, such as education and sustainable transport infrastructure.
What change in demand for services will there be? (e.g. Primary Care, hospital care, community services, mental health, social services)	There will be a significant increase in the demand for services as population grows, especially in the larger towns. This will apply across the board to all infrastructure and new and improved services and facilities will be required to cater for the growth.	There will be an increase in the demand for services in specific locations across the district. This will apply across the board to all infrastructure and new and improved services and facilities will be required to cater for overall growth. Health care provision and education will need to factor in proposed growth.
What impacts will there be on planetary health? (e.g. climate change mitigation)	The development strategy alone will not help deliver climate change measures, but alongside the principles of green to the core and live well locally, development can be sensitive and help to deliver climate change mitigation.	The development strategy alone will not help deliver climate change measures, but alongside the principles of green to the core and live well locally, development can be sensitive and help to deliver climate change mitigation.
Who will it effect, and will there be particular impacts on certain vulnerable groups? (e.g. older people, young, disabled, low income)	The development strategy will impact all groups of society, and together with other policies in the plan aims to bridge the gap between the most and least deprived in society by providing equal opportunities and access. A range of housing and employment growth opportunities will help all members of society in living well locally.	This part of the development strategy will cater for the needs of a specific 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.

The preferred option for the Development Strategy and reasons for selecting this

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

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

4.40. The **Council's reasons for selecting the option**, at this time, are as follows:

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

The Council's selection of the preferred option is set in the context of the significant land-use constraints to new major development within Rother, including the High Weald National Landscape (which covers 83 per cent of the district) and internationally or nationally protected habitats sites (which cover 7 per cent of the district). Whilst this does not preclude new development from coming forward within the National Landscape, this must be carefully managed as the Council has a legal duty to seek to further the statutory purpose of National Landscapes.

To help avoid and mitigate adverse impacts on the natural and historic environment, as well as the district's distinctive landscape and rural character, a key principle of the preferred option is to locate new development within and around existing settlements. Further, these are considered to be sustainable locations in that they generally benefit from a good level of provision of services and facilities, which can help to ensure public access to these, as well as to provide a logical spatial focus for their future improvement

or expansion. Existing settlements are also comparably better served by public transport than other parts of the district. The preferred option therefore includes urban extensions to the North and West of Bexhill, the district's principal centre, along with development at the Hastings Fringes, Rye and Battle, including by taking advantage of radial links to existing settlements.

This preferred option is particularly important in addressing the SA objectives around climate change mitigation and transport, where there will be opportunities to promote and better facilitate transport modal shift away from car use, and reduce carbon emissions from transport, with additional benefits for health and wellbeing through active travel; however as the SA indicates, negative effects are still anticipated from pollution and emissions owing to the largely rural nature of the district and existing provision of strategic transport infrastructure, which will mean a continued level of car reliance, together with the emissions associated with residential and commercial uses through growth in residential and commercial uses.

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

The preferred option is also informed by findings of the Housing and Economic Land Availability Assessment (HELAA) (2026), which has identified land which is suitable, achievable and available for development. Whilst acknowledging, some of the options have been discounted because they are unlikely to be feasible, given the latest information on sites. This includes the proportional growth options (SDO8 and SDO9), and an option for new standalone settlement (SDO7), owing to lack of identified suitable sites to facilitate these.

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

The delivery of a new multi-modal corridor along the A21 has been discounted at this time, in response to consultation feedback on the first Regulation 18 draft Local Plan (2024). Representations to the consultation, including from statutory bodies, raised concerns with the deliverability of this option due to a lack of identified funding and justification for potential works to the Strategic Road Network, and need for further cross-boundary discussions with relevant authorities. Rather than wholesale growth along all settlements within the A21 corridor, the preferred option is therefore for focussed development only within and on the edges of those larger settlements which already have a level of services and facilities and offer existing opportunities for sustainable travel (including improvements to bus services, cycling and walking infrastructure).

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

Suggested mitigation measures

- 4.41. In light of the findings of the SA of the preferred option for the Development Strategy, the following mitigation measures are suggested. These mitigation measures are not exclusively for the Development Strategy policy and may be addressed elsewhere in the draft Local Plan. This may include site allocation policies, strategic policies for thematic topic areas, and/or development management policies. The mitigation measures can work together with the Development Strategy to help address negative scores identified, and/or to improve scores particularly for neutral or negative scores on specific SA objectives.

SA Objective	Suggested mitigation measures
1. Reduce air pollution from transport and development and improve air quality.	<ul style="list-style-type: none"> • Undertake a detailed Transport Assessment of the Development Strategy and corresponding site allocations to inform potential mitigation measures • Make provision for public realm enhancements to encourage and enable active travel • Make provisions for new development to include green infrastructure, particularly where it is located next to the highway network • Seek timely delivery of new and improved public transport infrastructure, working with relevant bodies on the Infrastructure Delivery Plan
2. Biodiversity is protected, conserved and enhanced.	<ul style="list-style-type: none"> • Seek to protect existing habitats sites, including by locating new development away from them • Ensure new developments provide green buffers where they are located in proximity to habitats • Make provisions for Biodiversity Net Gain to be delivered on-site and where not possible, ensure appropriate mechanisms for the delivery of off-site contributions • Ensure the Local Plan aligns with the Local Nature Recovery Strategy
3. The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)	<ul style="list-style-type: none"> • Include standards for energy use and carbon reduction which follow the energy hierarchy • Seek to maximise opportunities for the creation and use of decentralised energy networks and renewable energy • Seek opportunities to support modal shift, such as the delivery of new and improved public realm and strategic public transport infrastructure
4. Minimise water consumption.	<ul style="list-style-type: none"> • Include standards for water efficiency in new development
5. Manage and reduce the risk of flooding (fluvial, tidal and surface water), now and in the future, and increase resilience to the wider effects of climate change.	<ul style="list-style-type: none"> • Seek to locate new development away from areas at risk of flooding, both on an area and site wide basis • Undertake Level 2 Strategic Flood Risk Assessment, together with sequential and exception tests for site allocations • Include policies to ensure Sustainable Drainage Systems (SuDS) are incorporated into new development • Seek timely delivery of new and improved infrastructure for water management and flood defences, working with relevant bodies on the Infrastructure Delivery Plan
6. The risk of coastal erosion is managed and reduced, now and in the future.	<ul style="list-style-type: none"> • Seek to locate new development away from the coastline • Identify a coastal management area and set policies which align with the Inshore and Offshore Marine Plan

7. The health and well-being of the population is improved and inequalities in health are reduced.	<ul style="list-style-type: none"> • Seek opportunities to promote access to recreation and open space • Seek to improve and expand opportunities for movement by walking, cycle and other active travel modes • Ensure the timely delivery of community infrastructure as new development comes forward, or where there are existing deficits in provision, in accordance with the Infrastructure Delivery Plan • Require Health Impact Assessments to be completed on new development
8. More opportunities are provided for everyone to in a suitable home to meet their needs.	<ul style="list-style-type: none"> • Set requirements to address housing need by tenure, size and type (including affordable housing) together with overall quantum of housing
9. All sectors of the community have improved accessibility to services, facilities, jobs, and social and cultural opportunities.	<ul style="list-style-type: none"> • Seek to locate development in areas which benefit from existing provision of services, facilities and community infrastructure • Identify gaps in provision of community infrastructure through the IDP, and set policies to secure new or improved provision, including delivery on-site where appropriate
10. Safe and secure environments are created and there is a reduction in crime and fear of crime.	<ul style="list-style-type: none"> • Set development requirements and standards for new development, informed by the National Design Guide
11. Historic environment/ townscape is protected, enhanced and made more accessible.	<ul style="list-style-type: none"> • Set policies to protect the significance of heritage assets and their setting • Require heritage assessments to be submitted at the planning application stage • Set policies for sustainable retrofitting of heritage assets
12. The risk of pollution to land and soils is reduced and quality is improved.	<ul style="list-style-type: none"> • Seek to locate new development giving priority to brownfield land and sites • Seek to locate development in areas of lower grade agricultural land • Set policies to ensure investigations are undertaken on contaminated land, and remediation measures undertaken where necessary
13. Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced.	<ul style="list-style-type: none"> • Set policies to ensure new development includes appropriate facilities for waste management and recycling • Set policies to promote circular economy principles, having regard to the waste hierarchy

14. The risk of pollution to water is reduced and water quality is improved.	<ul style="list-style-type: none"> • Seek timely delivery of new and improved water and wastewater infrastructure, where necessary, working with relevant bodies on the Infrastructure Delivery Plan • Incorporate Sustainable Drainage Systems (SuDS) in new development, to ensure higher water quality discharges • Where appropriate, set standards for water filtration
15. Ensure that Parks, gardens and countryside are protected, enhanced and made more accessible.	<ul style="list-style-type: none"> • Seek to avoid locating new development in areas, and at parts of sites, of highest landscape sensitivity • Set development standards and guidelines in relation to landscape protection and enhancement • Take account of the National Landscape (AONB) management plan in the layout and design of new development • Set policies to protect public open space
16. Economic performance is improved.	<ul style="list-style-type: none"> • Ensure employment land is protected, and new land is allocated where there is an identified need, together with ensuring a wide range of business space • Support and reinforce the role of existing town and local centres, to ensure their vitality and viability, including by locating new development within and around them
17. There are high and stable levels of employment and diverse employment opportunities for all.	<ul style="list-style-type: none"> • Seek planning contributions for employment, skills and training • Set policies to ensure a sufficient provision of business space
18. Levels of poverty and social exclusion are reduced, and the deprivation gap is closed in the more deprived areas.	<ul style="list-style-type: none"> • Identify and map areas of deprivation in the district • Seek transport access and public realm enhancements to and within key employment locations, including town and local centres
19. Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve.	<ul style="list-style-type: none"> • Seek planning contributions for employment, skills and training
20. Road congestion levels are reduced and there is less car dependency and greater travel choice.	<ul style="list-style-type: none"> • Undertake a detailed Transport Assessment of the Development Strategy and corresponding site allocations to inform potential mitigation measures • Make provision for public realm enhancements to encourage and enable active travel • Seek timely delivery of new and improved public transport infrastructure, working with relevant bodies on the Infrastructure Delivery Plan

SA of the Development Density options

Background

- 4.42. It is important to consider not only the distribution of new housing but also the appropriate density of housing in different locations. The NPPF states that “where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site”.¹⁹
- 4.43. Preliminary work on the draft Local Plan suggests that there is likely to be a shortfall of suitable and available sites to meet the Government’s Local Housing Need figure for Rother in full. Therefore, the Council has considered various density options for development in different locations of the district. This is necessary to inform approaches to maximising housing delivery, as much as reasonably practical, to meet identified needs whilst ensuring that development densities are appropriate to their context.

Formulating the residential development density options

- 4.44. To support context-sensitive growth, Policy LWL1 of the draft Rother Local Plan (2024) divided Rother into five area types, each with tailored density expectations, as defined by Rother’s Density Study (2024). These density figures are measured as dwellings per hectare (dph). This is shown by Figure 19 below.

Figure 19: Density Options by Settlement Type (Policy LWL1, Draft Local Plan 2024)

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

¹⁹ NPPF (December 2024), paragraph 130.

4.45. Since the first Regulation 18 consultation, the Council has further examined whether these density expectations are appropriate, having regard to the need to optimise the use of land and maximise housing delivery. To explore and help assess the appropriateness of different density levels across Rother's settlement types, three strategic 'in principle' options, or **reasonable alternatives**, have been developed, as set out in Figure 20 below:

Figure 20: Residential density options

Density option	Principle	Description
Option A. Business as usual	Current density standard and baseline for comparison.	Reflects density levels based on the adopted Development and Site Allocation Local Plan (including recently consented schemes). Urban areas (94dph) Suburban areas (56dph) Edge (Live Well Locally Areas) (21dph)²⁰ Village Areas (25 dph)
Option B. Higher density	Higher density with a moderate uplift in development density (compared to the baseline).	Urban areas (120dph): Compact low-rise development at the lower end of the high-density spectrum. Suburban areas (60dph): Low-rise development at the upper end of the medium-density spectrum. Live Well Locally Areas (40dph): Low-rise development at the mid-range of medium density, located on the urban edge. Village Areas (35 dph): Low-rise development at the lower end of the medium-density spectrum, with a strong emphasis on rural character, landscape sensitivity, and integration with existing village form and scale.
Option C. Higher density plus	Higher density with a significant uplift in development density (compared to the baseline)	Urban areas (150 dph): Mid-to-high-rise development at the upper end of the high-density range. Suburban areas (75 dph): Compact low-rise development at the lower end of the high-density spectrum. Live Well Locally Areas (50 dph): Low-rise development at the higher range of medium density. Village Areas (40 dph): Compact low-rise development at the mid-range of medium density, located in rural settlements.

²⁰ Live Well Locally areas are not designated or otherwise defined in the extant Local Plan. Edge of settlement areas have been used as a comparator for the purpose of this SA.

- 4.46. The density options have been established for the purpose of considering reasonable alternatives for housing density that could potentially be delivered on sites, along with their implications for housing capacity across the district. These have been based on good practice examples of higher density development achieved within the district as well as in other authority areas, including those with comparable attributes to Rother. The assessment of densities is based on assumptions of dwellings per hectare (dph) on sites, with ranges (and average densities within this range) which have been assigned for each of the area types.
- 4.47. Further information on the density considerations and options is set out in the Council's updated Density Study (2026).

Scenario testing of the residential density options

- 4.48. The residential density options set out above have been 'scenario' tested to aid with understanding their implications for the amount (quantum) of housing development that could be delivered, in principle, both across the district and within the 5 sub-areas set out in the draft Rother Local Plan.
- 4.49. The scenarios are based on the proposed site allocation policies included in the draft Rother Local Plan (2026). They have been calculated based on the following assumptions for site allocations that include residential uses:
- Where there is an extant planning permission or resolution to grant subject to legal agreement, then the capacity for a site allocation is based on the approved scheme. In this case, the development capacity figure is 'fixed'.
 - For all other site allocations, the capacity is derived by applying the density options (standards), as set out in the Figure above, to the estimated 'developable area' of the site, as proposed in the draft Local Plan (2026).²¹ In this case, the development capacity figure is 'not fixed', and can be adjusted based on different density assumptions in dwellings per hectare.
 - Windfall development is not included in the calculations.
- 4.50. The residential capacity for individual sites is then combined to provide capacity figures for the district overall and each of the respective sub-areas. It is important to note that the residential capacity figures are indicative only and based on a 'policy off' assumption. This means that they do not respond to site specific matters or constraints, which may impact

²¹ Not all of a site allocation area will necessary be developed, as space may be required for public realm, access and servicing, utilities, open space and green infrastructure, etc., depending on site specific circumstances.

on layout, design and densities that may ultimately be achieved through the development management process.²²

4.51. The outputs of the scenario testing exercise are set out in Figure 21 below.

Figure 21: Residential development density scenario testing

Sub-area	Developable area (hectares) ²³ of site allocations	Option A capacity (units)	Option B capacity (units)	Option C capacity (units)
Bexhill	94	3,563	5,317	6,357
Southern Rother & Hastings Fringes	10	379	458	543
Battle and Surrounding Settlements	24	1,125	1,301	1,575
Rye and Eastern Settlements Cluster	22	931	1,190	1,429
Northern	31	718	959	1,078
Rother District	181	6,716	9,225	10,982

A note on employment densities

4.52. In preparing the draft Local Plan, the Council has drawn on the Housing and Economic Development Needs Assessment (HEDNA) (2024) for considering employment land and floorspace requirements. Where proposed site allocation policies include provision for employment floorspace, the site capacities have been informed by existing planning permissions and extant allocations, where relevant, or by applying the plot ratios for Rother as set out in the HEDNA²⁴, also taking account of individual site constraints.

SA of the options

4.53. The Development Density options and scenario testing of these have been assessed using the SA Framework, and findings are set out below.

4.54. When development densities are considered independently (i.e., in isolation of other Local Plan policies) and in the absence of mitigation measures, there are many uncertainties in

²² The figures of the 'preferred approach' option for residential densities therefore do to correspond exactly with the capacity figure set out in the draft Local Plan (2026). Also, the density option is presented as an 'average' within a range of densities.

²³ Figures are rounded to the nearest whole number.

²⁴ HEDNA (2024), sets out a plot ratio for Rother of 0.3 for employment uses. The study also draws on the Employment Density Guide 3rd Edition (Homes and Communities Agency, 2015), which is an industry standard.

the scoring against the SA objectives, and overall, the options all score negatively across the full complement of objectives.

- 4.55. Where likely positive effects are scored, this is owing to the options providing, to varying extents, support for the provision of more housing to meet identified needs, with significant positive effects for the higher density options (B and C). This is particularly important in the context of the NPPF and the Government's Local Housing Need calculation for Rother. The SA also scores positively for higher density options in terms of access to facilities and services, on the basis that the clustering of higher density development can enable more people to access services and facilities located in proximity to the development.
- 4.56. Negative impacts are generally associated with the increase in population with higher density development, which is likely to lead to increases in pollution and resource use (such as energy consumption) unless appropriately mitigated. In addition, higher density development may also have adverse impacts on heritage assets and their setting, as well as on landscape including its character.
- 4.57. One of the key uncertainties relates to SA objective 20 on transport. On the one hand higher density development is likely to increase the population locally and result in additional car use. However, higher density development also provides opportunities to facilitate sustainable transport and modal shift away from car use where it is located in areas that benefit from good public transport and provision of services and facilities.

Suggested mitigation measures

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

Figure 22: SA of the Residential Development Density Options

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

Residential Development Density Options	Description/Vision	1 Air pollution	2 Biodiversity	3 Climate Change	4 Water Consumption	5 Flooding	6 Coastal Erosion	7 Health and Well-being	8 Housing	9 Accessibility to services	10 Safe Environments	11 Historic Environment	12 Pollution	13 Waste and Recycling	14 Water Pollution	15 Natural Landscape	16 Economic Performance	17 Employment Levels	18 Deprivation	19 Skills and Education	20 Transport	Score	Summary
																							associated with increase in development, such as construction and professional services. Scoring on many objectives uncertain.

Figure 23: Summary of the Residential Development Density Options

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

The Preferred Option and reasons for selecting this

- 4.59. At this time, and having considered the SA, the Council's preferred option for residential density is Option B (Higher density).
- 4.60. Option B is preferred as higher density development can help to facilitate a significant step change in provision of housing to meet identified needs – well above the baseline that could be delivered through the densities associated with the extant Local Plan. This is particularly important in the context of the Government's Local Housing Need figure for the district.
- 4.61. Option C (Higher density plus) is not preferred. Whilst this option is also likely to facilitate the delivery of new housing over and above the baseline, it presents the likelihood of more significant negative effects on the SA objectives than Option B, particularly with respect to the historic environment and landscape, including landscape character. The potential adverse impacts are notable for Option C, as scenario testing suggests it will not result in a substantive increase on the overall development capacity compared to Option C, but comes with considerably greater risks to sustainability.
- 4.62. Option A is also not preferred. Whilst this is likely to have comparably less adverse effects across the SA objectives than Options B and C, it would likely result in a considerable shortfall in the delivery of new housing to meet identified needs.
- 4.63. The Council acknowledges that support for higher density development will require careful consideration through the plan process and the inclusion of necessary and appropriate mitigation measures to ensure that potential adverse impacts on the SA objectives are avoided or mitigated.
- 4.64. For the draft Local Plan, the preferred approach option is presented both as a density range and a simple average density for each area type, to reflect the diversity of housing forms and layouts within each context. The range captures the flexibility needed to respond to site-specific circumstances, design aspirations and infrastructure capacity, while the average offers a clear benchmark for strategic planning and comparative analysis. This dual approach supports more nuanced decision-making and avoids oversimplifying the character of different area types.
- 4.65. It is important to note that the actual density that will be delivered on sites across the district will be determined on a case-by-case basis, through the development management process and having regard to the adopted Local Plan.

Figure 24: Preferred Approach for Residential Development Density (Ranges)

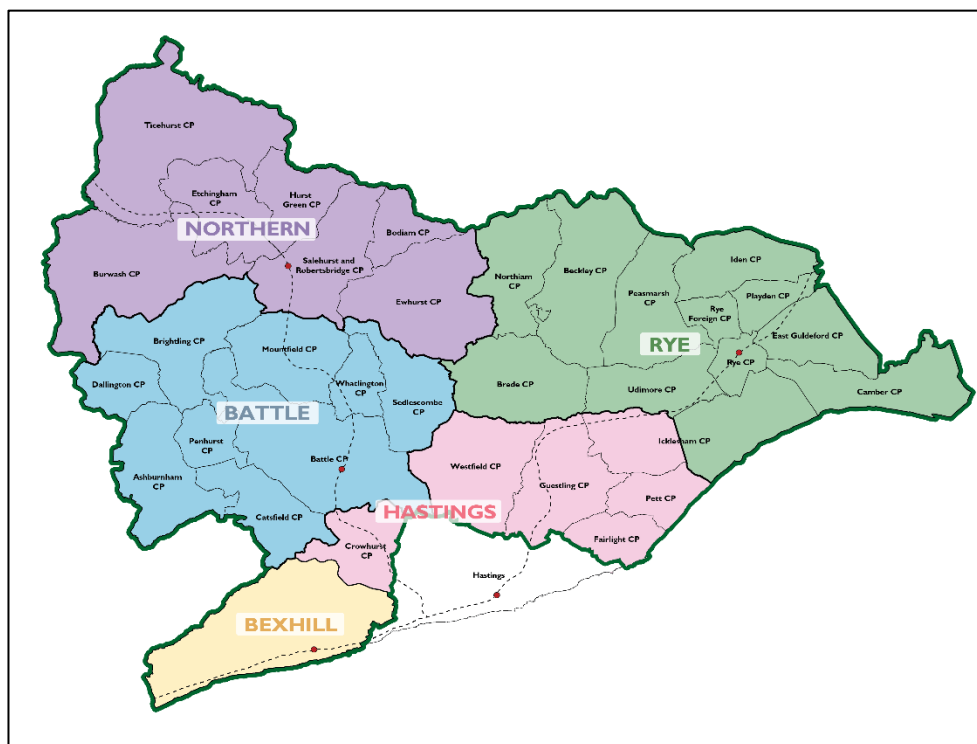
Area Type	Option B (Higher density)
Urban areas in Bexhill, Battle and Rye	110 – 125 dph (avg. 120)
Suburban areas in Bexhill, Battle, Hastings Fringes and Rye	45–75 dph (avg. 60)
Live Well Locally (Urban Edge of Bexhill)	35–55 dph (avg. 40)
Villages with development boundaries	25–45 dph (avg. 35)
Countryside (including villages and hamlets without development boundaries)	—

SA of the Sub-area Visions

Background

- 4.66. The draft Local Plan (2024) identified 5 sub-areas of Rother. These were presented as a way for the plan to focus on the delivery of the proposed Development Strategy for the district at a more localised level. For each sub-area, the plan included a ‘vision statement’ and indicative development figures, which were disaggregated from the overall development figures for the district. It was noted that the ‘countryside’ was a feature of all of the sub-areas but did not comprise a sub-area in itself. The sub-area visions do not comprise specific policies within the Local Plan, but they help to set a picture for how the sub-areas will develop during plan period.
- 4.67. The sub-areas, including their boundaries, have been retained in the current draft Local Plan (2026). These are shown in Figure 25 below, although note that the Figure does not include the full titles of the sub-areas.

Figure 25: Rother Development Strategy sub-areas



- 4.68. The Interim Sustainability Appraisal (2024) included an assessment of the sub-area visions and their respective distribution of housing and employment development as part of the Development Strategy for the Local Plan.²⁵ The appraisal findings table is included below in this report for information. It should be noted that the cumulative and synergistic effects of the area visions were not appraised on the basis that these were considered as part of the wider development strategy.

²⁵ Rother District Local Plan 2020-2040, Interim Sustainability Appraisal (2024), pp. 87-89.

Reviewing the updated sub-area visions

- 4.69. The sub-area visions and their associated indicative development figures were reviewed and updated in the draft Rother Local Plan – Development Strategy and Site Allocations (2026) document. For completeness, and as part of the iterative SA process, these changes are considered here to understand whether they may result in any changes to the initial SA findings.
- 4.70. This review is focussed on identifying the nature and extent of the changes to the sub-area visions, so to assess whether they are likely to result in substantive changes to the visions set out in the draft Rother Local Plan (2024), and therefore, merit a re-appraisal of the initial SA on this matter. Further, the intention here is to review changes to the visions, rather than the indicative development figures. This is because considerations for the overall amount and distribution of growth over the plan period is necessarily covered by the SA of the Development Strategy, as set out earlier in this report.
- 4.71. Figure 26 below provides a summary of the main changes to the visions for the respective sub-areas, along with commentary on the implications of this for the Interim Sustainability Appraisal (2024) findings.

Figure 26: Review of Sub-area Visions

Sub-area	Summary of main changes to vision	Implications for Interim SA (2024) findings
Bexhill	<ul style="list-style-type: none"> Change to emphasise growth will be ‘primarily’ in the urban area and on brownfield sites. Change in indicative development figures for housing and employment space. Change to emphasise development density maximised not only within proximity to town centres but also key transport connections. Change to include improvements to station capacity (along with other measures) that will work with other measures to enhance connections between Bexhill and nearby settlements. Signpost vision for improvements to health inequalities and wellbeing, enabling communities to lead healthy and active lifestyles. Change to note that Bexhill will play an active role in the Pevensey Bay to Eastbourne Coastal Management Scheme. 	<ul style="list-style-type: none"> Changes to indicative development figures, which are to be assessed as part of the Development Strategy. Greater focus on coastal management, which improves positive scoring for objective SA6. Improvements to station capacity is positive for objective SA20 but does not affect scoring overall. Changes to wording that clarify and reinforce principles of the vision, and outcomes sought, but are not considered to affect the SA scoring on whole.

Sub-area	Summary of main changes to vision	Implications for Interim SA (2024) findings
Southern Rother and Hastings Fringes	<ul style="list-style-type: none"> Change from ‘small level of sensitive development’ to ‘sensitive development’. Change in scope of transport improvements and connections and improved accessibility – from settlements linked radially to Hastings, to settlements in Southern Rother that are near to Hastings. Inclusion of indicative development figures for housing and employment space in the vision. 	<ul style="list-style-type: none"> Changes to indicative development figures, which are to be assessed as part of the Development Strategy. Changes to wording that clarify and reinforce principles of the vision, and outcomes sought, but are not considered to affect the SA scoring on whole.
Battle and Surrounding Settlements	<ul style="list-style-type: none"> Change from higher density commercial development to sensitive commercial development, including through extensions to and densification of existing employment sites. Change from a greater amount of sensitive growth will take place south of North Trade Road and west of Hastings Road, to south-west of Hastings Road. Change from a ‘small level of growth’ to a ‘reasonable level of growth’ that will help support improving the overall sustainability and vitality of the cluster of villages around Battle. Inclusion of indicative development figures for housing and employment space in the vision. 	<ul style="list-style-type: none"> Changes to indicative development figures – and change in emphasis on level of growth - which are to be assessed as part of the Development Strategy. Changes to wording that clarify and reinforce principles of the vision, and outcomes sought, but are not considered to affect the SA scoring on whole.
Rye and Eastern Settlements Cluster	<ul style="list-style-type: none"> Inclusion of indicative development figures for housing and employment space in the vision. 	<ul style="list-style-type: none"> Changes to indicative development figures, which are to be assessed as part of the Development Strategy.
Northern Rother	<ul style="list-style-type: none"> Change from ‘small-scale sensitive residential development and growth in villages’ to ‘sensitive residential development and growth in villages.’ Change to reflect lesser environmental impact from car use owing to EV use and related infrastructure. Re-ordering of principle regarding opportunities for sensitive development in the short term, where sustainable and related to an existing settlement. Revised wording around transport infrastructure and A21 sustainable transport corridor Inclusion of indicative development figures for housing and employment space in the vision. 	<ul style="list-style-type: none"> Changes to indicative development figures – and change in emphasis on level of growth - which are to be assessed as part of the Development Strategy. Reference to EV take-up likely to have positive effects on objectives SA1 and SA3 but do not change scoring. Changes to wording that clarify and reinforce principles of the vision, and outcomes sought, but are not considered to affect the SA scoring on whole.

- 4.72. As set out above, whilst some amendments to the draft Rother Local Plan sub-area visions have been made, these changes are not considered, on whole, to affect the overall appraisal of the visions set out in the Interim Sustainability Appraisal (2024). The table above notes where the updated visions result in some limited changes to the sustainability scoring for selected SA objectives, however these are limited to specific sub-areas and do not apply to all of the sub-areas.
- 4.73. The most significant changes to the visions relate to the updated indicative development figures for housing and employment space, which are subject to SA as part of the Development Strategy, as set out previously in this report.

4.74. The following table 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 draft Local Plan 2020-2040. This table was included in the Interim Sustainability Appraisal (2024) and should be read together with Figure 26 above.

Figure 27: Assessment of Sub-area Visions & Development, as set out in Interim Sustainability Appraisal (2024)

SA Objective / Sub-Area Visions & Development	Bexhill	Hastings Fringes	Battle	Rye & Eastern Settlements	Northern Rother	Commentary
1. Reduce air pollution from transport and development and improve air quality.	--	--	--	--	--	All sub-area strategy areas and associated growth will inevitably cause a negative impact against this objective, Additional population and vehicle use along with the construction of development will have a negative impact.
2. Biodiversity is protected, conserved and enhanced.	o	o	o	o	o	There will be opportunity for BNG in all sub-areas, but some biodiversity may be impacted by development. This will be managed on a site-by-site basis so overall impact should be neutral, no difference between sub-area.
3. The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)	-	-	-	-	-	The development strategy and spatial areas vision alone will not be able to deliver this. Whilst the visions are aspirational and support climate change measures, inevitably growth will result in increased pressure, managed by other supporting policies in the Green to Core chapter of the Local Plan.
4. Minimise water consumption.	-	-	-	-	-	Water consumption cannot be reduced significantly through new growth and development; there will be additional pressure placed on water usage. Supportive policies to help reduce overall water consumption are found in other policies in the Local Plan.

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

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

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

Chapter 5 Appraisal of the Site Allocation policy options

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

SA of the Housing and Economic Land Availability Assessment sites

Background

- 5.4. To inform the preparation of the Local Plan, the Council has produced a HELAA in line with national planning policy and guidance. The purpose of the HELAA is to provide an assessment of the potential supply of land which is 'suitable, available and achievable' for housing and economic development over the plan period. The HELAA can also help to identify land that may be suitable for other uses to support future development, such as land for renewable energy infrastructure, nature recovery and other green infrastructure.
- 5.5. The HELAA is the starting point for considering sites that may be appropriate to bring forward in the Local Plan as site allocation policies – **the HELAA effectively provides the initial broad range of site options (or alternatives)** to be considered during the preparation of the plan.
- 5.6. The HELAA is reviewed and updated during the preparation of the Local Plan to ensure it reflects the latest available information. A draft HELAA (April 2024) was published to support the first Regulation 18 consultation on the draft Rother Local Plan 2020-2040, which was carried out during April – July 2024. Since then, the study has been updated and reviewed, and a revised draft HELAA (January 2026) has been published to support the second Regulation 18 consultation on the draft Rother Local Plan – Development Strategy and Site Allocations.

Draft HELAA (2024)

- 5.7. The HELAA started with a site identification exercise. An initial list of sites was compiled from a wide range of sources, as follows:

- Reassessment of sites previously considered through land assessment exercises, including the Council's Strategic Housing Land Availability Assessment (2013) and Neighbourhood Plans;
 - Public 'Call for Sites', which was launched in October 2020;
 - Council officer search for sites, including desktop research and identification of sites owned by Rother District Council or other local authorities;
 - Sites that had been subject to a planning application, with a size threshold commensurate to the HELAA criteria;
 - Sites subject to an allocation through the Development and Site Allocations Local Plan, or an extant Neighbourhood Plan but not yet delivered; and
 - Sites on the Council's Brownfield Land Register.
- 5.8. Over 900 sites were identified through this exercise. Following which, an initial (Stage 1) assessment was undertaken to identify 'potentially suitable' sites. Thereafter, the 'potentially suitable sites' were taken forward for a further (Stage 2) suitability assessment, which considered the availability and achievability of sites, along with their potential development capacity.
- 5.9. It is important to note that a number of sites were removed from the HELAA because construction on them had either commenced or completed, and these sites would therefore not form part of the future housing land supply.
- 5.10. The draft HELAA (2024) indicated that there was a potential supply of land and sites for between 5,158 – 7,287 new dwellings and 78,165 – 104,399 new employment floorspace across the district.

SA of the draft HELAA (2024) sites

- 5.11. The draft Rother Local Plan (2024) did not include proposed site allocation policies. However, it did provide information on findings of the draft HELAA (2024). Furthermore, the draft HELAA was published during the first Regulation 18 stage consultation, with the public invited to submit representations on it.
- 5.12. The Interim Sustainability Appraisal (2024) provided an assessment of the draft HELAA (2024) sites. The SA considered 3 main categories of HELAA sites:
- Identified (committed) sites: sites allocated for development, sites which have an extant planning permission, or sites with a current planning application with a resolution to grant, subject to a legal agreement;
 - Potential additional sites: newly identified sites which may be suitable, available and achievable for development over the plan period, as set out in the HELAA; and

- **Rejected submitted sites:** sites submitted through the ‘Call for Sites’ exercise and therefore considered available but assessed through the HELAA as unsuitable or not achievable.
- 5.13. Whilst the draft HELAA and SA are both site assessment tools, there are distinctions between their purpose and evaluation criteria. The draft HELAA considers sites for their deliverability (in the context of the Local Plan), whereas the SA assesses the relative sustainability of sites (against the SA Framework). However, there are similarities between some of their criteria, particularly as the ‘suitability of sites’ is considered in the wider context of ensuring the Local Plan supports sustainable development, consistent with the NPPF.
- 5.14. In terms of the ‘rejected submitted’ sites, whilst these sites are available, the HELAA has determined that they are not suitable or achievable, and therefore not considered to be developable; however, assessing these sites through the SA helps to compare their sustainability merits as **potential site allocation options (or reasonable alternatives)**.
- 5.15. The Interim Sustainability Appraisal report (2024) provided a series of assessment tables. The tables set out scores for each category of site (committed, potentially suitable, and rejected submitted) against the 20 SA objectives, as set out in the SA Framework. The tables were supplemented with supporting text under the following sub-headings: summary for all sites, sustainability impacts and conclusions. The Interim report should be referred to for full information on the site assessment results, which are not included here in order to avoid duplication.
- 5.16. The overall conclusions of the SA for the respective site types in the HELAA (2024) are set out in Figure 28.

Figure 28: Overall conclusions on SA of draft HELAA (2024) sites

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

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

5.18. The Interim SA (2024) acknowledged that further detailed assessments of sites would be undertaken once proposed site allocation policies were confirmed.

SA of the proposed site allocation sites and reasonable alternatives

5.19. The draft Rother Local Plan – Development Strategy and Site Allocations (2026) includes proposed site allocation policies. As discussed above, the identification and selection of these sites has been informed by the Housing and Economic Land Availability Assessment.

Draft HELAA (2026)

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

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

5.21. The updated draft HELAA (2026) should be referred to for information on the methodology and detailed findings of this exercise.

The proposed site allocation sites and reasonable alternatives

5.22. As with the initial HELAA (2024), the updated study involved site identification and assessment exercises. These lead to the collation of a portfolio of sites defined as: identified (committed); potential additional; or rejected. All sites that were assessed through the draft HELAA (2026) as suitable, available and achievable were taken forward as proposed site allocation in the draft Local Plan – Development Strategy and Site Allocations (2026).

- 5.23. At this stage in the plan process, the Council considers **the reasonable alternative sites** to be those sites that have been submitted through the 'Call for Sites' or are otherwise understood to be potentially available but have been rejected through the HELAA on the basis that they are not suitable and/or achievable.

Methodology for assessing site allocation sites and reasonable alternatives

- 5.24. Whilst the SA process is intended provide for an objective assessment of a plan proposal (and reasonable alternatives), it invariably introduces an element of subjective judgement. To help overcome this issue with the SA of proposed site allocation options, a bespoke appraisal template has been produced for this Local Plan. This template sets out clear decision-making criteria for assessing the likely environmental, social and economic effects of introducing new development on specified sites. The criteria are drawn from the Council's existing evidence base along with other recognised and publicly available data sources and aided by the use of Geographical Information System (GIS) data. The template helps to standardise the SA process and provides for a consistent and transparent approach to the site assessments.
- 5.25. The site appraisal template is set out in **Appendix 3** of this Interim Sustainability Appraisal report. It builds on and applies the SA Framework established in the SA Scoping Report. It also provides for a more granular assessment of the sustainability of sites when compared to the preliminary SA of the HELAA sites in the Interim Sustainability Appraisal (2024). This more detailed assessment is commensurate with the current stage of the plan process, where proposed site allocations are now being considered.
- 5.26. Notably, not all of the 20 SA objectives are covered by the template. Whilst the majority of objectives are addressed, some have been screened out after careful consideration. There are several reasons for this, but it is mainly owing to the principle that impacts on some objectives will be more appropriately dealt with elsewhere through the SA of the Local Plan (e.g., SA of the Development Strategy, and thematic based 'strategic' and 'development management' policies). Also, there are some objectives where the same answer to a criterion, or criteria, would apply to all sites. For example, on SA objective 8, the introduction of new homes on a site will score as positive as this will help to address identified local need. Similarly, for SA objective 4, the introduction of new development will add to rather than minimise water consumption in the district. Therefore, it is considered appropriate to remove such objectives from the template, as they will not be particularly helpful in a comparative analysis of the sustainability merits of different sites.
- 5.27. In line with the above, the SA objectives screened out from the site assessment template are as follows:
- SA4: Minimise water consumption
 - SA8: More opportunities are provided for everyone to in a suitable home to meet their needs.
 - SA10: Safe and secure environments are created and there is a reduction in crime and fear of crime.

- SA13: Through waste reuse, recycling and minimisation, the amount of waste for disposal is reduced.
 - SA16: Economic performance is improved.
 - SA18: Levels of poverty and social exclusion are reduced, and the deprivation gap is closed in the more deprived areas.
 - SA19: Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve. The reasons for this are set out in the template itself.
- 5.28. At this early stage in the plan process, when site allocations options are being appraised, the template and its criteria are applied on a 'policy off' basis. This means the sites are assessed based on existing conditions, and do not take account of mitigation or other measures which might help to offset adverse impacts.
- 5.29. Mitigation measures are considered subsequent to the site assessment. This SA report sets out a series of potential mitigations to help avoid or minimise adverse impacts of new development on sites, or indeed, facilitate or improve positive impacts of development sites in areas across the district. The mitigation measures will be considered through the development of policies for allocated sites. This is part of the iterative process of SA.
- 5.30. At the Regulation 19 stage, therefore, the SA report will bring the assessment of sites made using this template in Appendix 3, together with additional considerations on the site allocation policies (and associated development requirements), and the full suite of Local Plan policies, including the 'development management' style policies.

Which sites have been assessed?

- 5.31. As noted above, all sites that have been identified in the HELAA as suitable, available and achievable have been taken forward as site allocations in the draft Local Plan. However, not all such sites have been assessed using the Appendix 3 template. As set out in Figure 29 below, sites with a planning permission or resolution to grant have not been appraised. This is on the basis that they have been assessed through the development management process - and through this have been judged to comply with the policies in the extant Development Plan and NPPF, which both seek to contribute towards the delivery of sustainable development.
- 5.32. Of other sites that are suitable, available and achievable - extant site allocations, including those in Neighbourhood Plans, which have not yet been delivered, have been assessed using the Appendix 3 template, along with potential additional sites (i.e., new sites identified through the HELAA which are not currently allocated and do not have planning permission). Sites submitted via the 'Call for Sites', or which are understood to be potentially available, but rejected by the HELAA have also been considered, as they comprise **reasonable alternatives** at this time.
- 5.33. It is important to note that whilst some sites have not been appraised using the Appendix 3 template (i.e., sites with extant planning consent or resolution to grant consent) they will

still be considered through the SA process. All proposed site allocation sites will form part of the wider SA of the Development Strategy, which they form and will help give effect to. Further, the sites will be appraised in relation to the whole of the local plan, at the Regulation 19 stage of plan production and SA.

Figure 29: Sites assessed using the (Appendix 3) SA template

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

Reading the site assessments

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

5.35. The assessments include:

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

5.36. The mitigation measures are intended to help inform policy production as work on the plan progresses and are part of the iterative SA process.

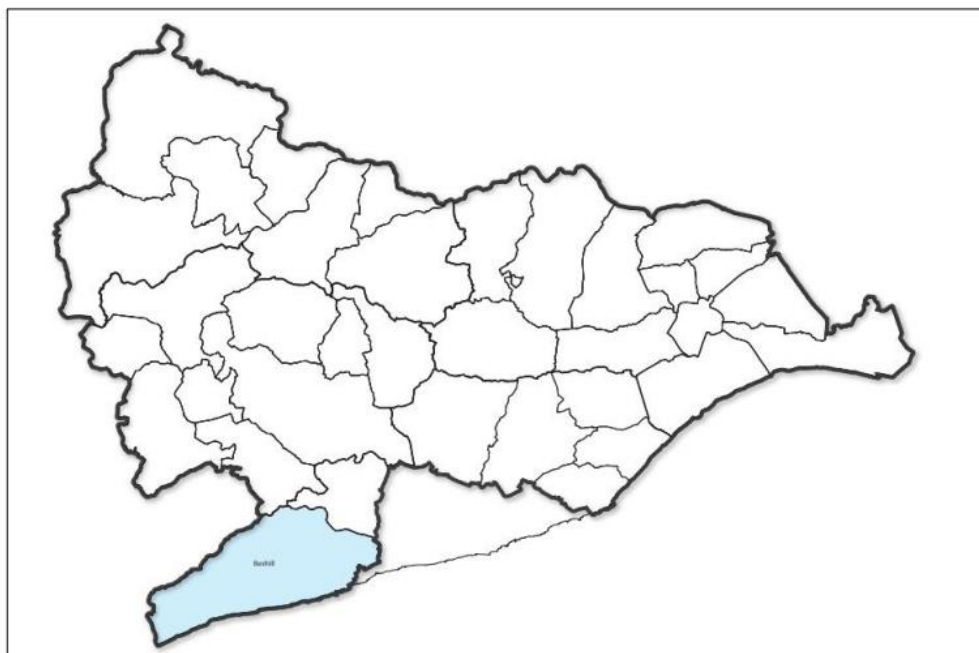
5.37. It is noted that delivery of strategic and other infrastructure will play an important role in supporting the sustainability of the Local Plan, including the site allocations, particularly in helping to mitigate local impacts of new development. The Council has prepared a draft

Infrastructure Delivery Plan (IDP) (2026) which will assist in identifying any deficiencies or gaps in infrastructure to adequately support the levels of growth and development set out in the draft Local Plan. The Council has and will continue to engage with infrastructure providers and other key stakeholders to prepare the IDP. The draft IDP (2026) has been significantly updated since it was first published in April 2024, and feedback from stakeholders will be used to confirm initial findings and supplement the information currently set out. Findings from the IDP will continue to inform the plan's production, including site specific policies.

Reasons for choosing the preferred option sites

- 5.38. The preferred option sites have been identified through the HELAA, by being assessed through that process as meeting the criteria of suitable, available and achievable, in accordance with the NPPF and PPG. At this stage in the preparation of the Local Plan, the sites identified through the HELAA as meeting these criteria are insufficient to accommodate the number of homes required to meet Rother's Local Housing Need (LHN) as calculated through the national "standard method". Therefore, all sites assessed through the HELAA as suitable, available and achievable are included as preferred options and have been progressed to proposed allocations in the draft Local Plan. The SA has informed the detail of the proposed site allocation policies, for example, to identify mitigations to enhance the sustainability of sites. As noted above, sites rejected through the HELAA as unsuitable, but which are known to be available, have also been subject to SA as these sites comprise reasonable alternatives at this time. The SA of these sites may help to inform considerations later in the plan process, should the sites be brought forward into the Plan.

SA of the Bexhill sites



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

Bexhill Central Urban Area

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

Main sustainability issues

- 5.41. The main sustainability issues in the Central Urban Area identified relate to flood risks, particularly from surface water flooding.
- 5.42. Sites generally scored positively on the appraisal in relation to the re-use of brownfield land, landscape impact, access to services, public open space and Public Rights of Way, and they are not constrained by the presence of biodiversity assets or features.

Additionally, many of the sites scored positively in climate mitigation terms due to being located within a potential heat network cluster.

Suggested mitigation measures

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

Bexhill Suburban Area

- 5.44. There are only two proposed allocated sites in the Bexhill Suburban Area for which SA has been undertaken, as the remaining two sites already benefit from planning permission. There are more positive and neutral effects compared to negative effects. The main significant positive effects relate to the sustainability of the location and access to services. The only significant negative effect, affecting one site, relates to the impact on greenfield land.
- 5.45. In respect of the rejected sites in this area, there are a mixture of positive, neutral and negative effects. Again, significant positive effects relate to the sustainability of the location and access to service. The only significant negative effects, affecting some sites, are due to risks of surface water flooding and the impact of developing greenfield land.

Main sustainability issues

- 5.46. The only sustainability issues identified for the proposed allocated sites in the Bexhill Suburban Area relate to impact on greenfield land and landscape impact, and one site being within a SSSI Impact Risk Zone. These sites generally scored positively on the appraisal in relation to access to services, public open space and Public Rights of Way, and they are not generally constrained by the presence of biodiversity assets or features or flood risks. Only one site scores positively for access to a railway station due to the distance of the other site to a station, and this issue also applies to the rejected sites.
- 5.47. Sustainability issues identified for the rejected sites in this area include impacts on biodiversity, flooding (including surface water flooding and groundwater flooding affecting some sites), impacts of developing greenfield land and landscape impacts. These sites generally scored positively on the appraisal in relation to access to services, public open space and Public Rights of Way, and most are not constrained by heritage assets.

Suggested mitigation measures

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

- The inclusion of green infrastructure and land for BNG within sites, to help mitigate the loss of greenfield land
- The protection of landscape features and inclusion of landscaping as part of development proposals
- Measures to improve access to a railway station.

Bexhill Western Area

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

Main sustainability issues

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

Suggested mitigation measures

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

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

Bexhill Northern Area

- 5.54. There are a mix of positive, neutral and negative effects for proposed allocation sites in the Bexhill Northern Area. The only significant positive effect, affecting one site, relates to the re-use of brownfield land. Some sites do have significant negative effects relating to risks of flooding (particularly surface water flooding), impacts on greenfield land, and for one site each, impact on higher quality agricultural land, access to essential services, and landscape sensitivity outside the High Weald.
- 5.55. Rejected sites in this area also have a mixture of positive, neutral and negative effects, including some significant negative effects relating to biodiversity impact (particularly impacts on Priority Habitats), flood risks, impacts on greenfield land, access to services and landscape sensitivity outside the High Weald. Some rejected sites have significant positive scores in respect of their access to services.

Main sustainability issues

- 5.56. The main sustainability issues affecting the proposed allocation sites in the Bexhill Northern Area include biodiversity impacts, with many sites adjoining ancient woodland and Priority Habitats, and landscape sensitivity. Many sites also have risks of surface water flooding, although this often affects only small parts of sites. Sites also score negatively due to impacts on greenfield and agricultural land, and some sites have heritage constraints. These sites generally scored positively on the appraisal in relation to access to services (with one exception), public open space and Public Rights of Way, and most sites did not have groundwater flooding constraints. The majority of these sites are closest to the settlement of Sidley (although some are a significant distance from services within the settlement) and while this means that they score positively in terms of the sustainability of the location, most sites are not close to a railway station. One site is closest to the settlement of Lunsford Cross which has a poor sustainability score.
- 5.57. Sustainability issues identified for the rejected sites in this area include impacts on biodiversity (particularly Priority Habitats), flooding (including flood zones 2 and 3 and surface water flooding), landscape sensitivity and impacts of developing greenfield land and agricultural land. These sites generally scored positively on the appraisal in relation to

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

Suggested mitigation measures

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

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

Summary of SA scoring for Bexhill sub-area (proposed site allocations) - residential

Significant positive	Minor positive	Neutral or uncertain	Minor negative	Significant negative
++	+	0	-	--

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

Suburban Area																													
BX14 – Land west of Fryatts Way	This site has outline planning permission (RR/2021/1656/P)																												
BX15 – Land north of Broadoak Lane (BEX0161)	35	++	0	0	0	0	0	++	0	+	+	0	++	+	+	++	0	0	0	0	0	0	N/A	-	--	0	N/A	++	0
BX16 – Land west of Pages Lane (BEX0158)	30	++	-	0	0	0	0	++	0	0	+	0	++	+	+	++	0	0	N/A	0	0	N/A	0	+	0	N/A	++	+	
BX17 – 81 Cooden Drive (BEX0188)	This site has planning permission (RR/2024/2052/P)																												

SA Objective		Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing				SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference			1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b	
West Bexhill Growth Area																														
BX19 – Gorses Car Park and open space, The Gorses (BEX0089)	10	+	-	0	0	0	0	0	+	0	-	+	0	+	+	+	+	0	0	N/A	0	0	N/A	0	0	0	N/A	+	+	
BX20 – Land off Spindlewood Drive	The site has outline planning permission (RR/2017/1705/P)																													
BX21 – Land north of Barnhorn Manor Caravan Park (BEX0215)	20	+	-	0	0	0	0	0	+	0	--	+	0	+	+	+	+	-	0	-	0	0	N/A	-	--	0	N/A	+	0	
BX22 – Land south of Barnhorn Road (MIXED USE) (BEX0233)	400	+	-	-	0	-	0	0	+	0	--	+	0	+	+	+	+	--	0	-	0	0	N/A	--	-	-	0	+	0	
BX23 – Land north of Rosewood Park	The site is subject to a planning application with a resolution to approve subject to a S106 agreement (RR/2023/1721/P)																													
BX24 – Land east of Sandhurst Lane (BEX0177)	68	+	-	-	0	-	0	0	+	0	--	+	0	+	+	+	+	0	0	0	0	0	N/A	--	--	0	N/A	+	0	
BX26 – Land south of Sandhurst Lane (BEX0239)	25	+	-	0	-	0	0	+	+	0	--	+	0	+	+	+	+	-	0	-	0	0	N/A	-	--	0	N/A	+	0	
BX27 – Beeches Farm and land north of Barnhorn Road (MIXED USE) (BEX0219)	540	+	-	0	0	-	0	0	+	0	-	+	0	+	+	+	+	-	0	--	0	0	N/A	--	--	0	+	+	0	

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
BX28 – Land at Northeye and adjoining land (BEX0240)	384	+	-	0	0	--	0	+	-	0	+	0	+	+	+	+	0	0	-	0	0	N/A	-	0	0	N/A	+	0

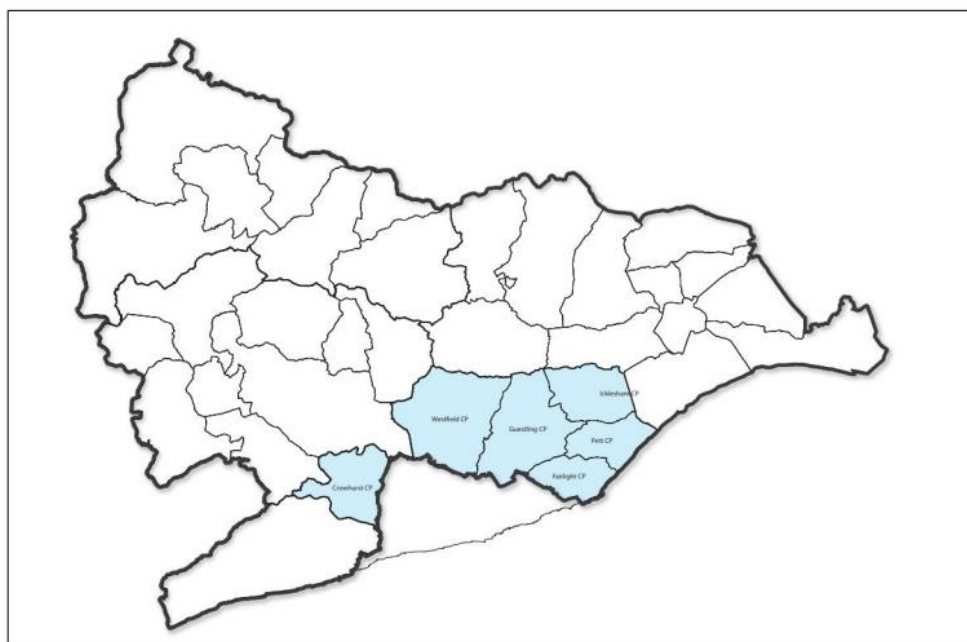
SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
North Bexhill Growth Area																												
BX31 – Land at Kiteye Farm (BEX0241)	300	+	0	-	-	-	0	+	--	--	+	0	+	+	+	+	0	0	-	0	0	N/A	-	-	0	N/A	+	0
BX32 – Land west of Watermill Lane (south)	The site is subject to a planning application with a resolution to approve subject to a S106 agreement (RR/2022/1584/P)																											
BX33 – Land west of Watermill Lane	The site is subject to a planning application with a resolution to approve subject to a S106 agreement (RR/2021/2545/P)																											
BX34 – Land east of Watermill Lane (BEX0242)	170	+	-	-	0	-	0	+	--	--	+	0	+	+	+	+	-	0	-	0	0	N/A	-	--	0	N/A	+	0
BX36 – Land north of Haven Brook Avenue (east) (BEX0243)	230	+	-	-	0	-	0	+	0	--	-	0	+	+	+	+	-	0	-	0	0	N/A	--	--	0	N/A	+	0
BX37 - Land north of Haven Brook Avenue (west) (MIXED USE) (BEX0244)	100	+	0	-	0	-	0	+	0	+	+	0	+	+	+	+	0	0	-	0	0	N/A	-	--	0	N/A	+	0
BX38 – Land west of Ninfield Road roundabout (BEX0245)	80	+	0	-	0	-	0	+	0	--	+	0	+	+	+	+	0	0	-	0	0	N/A	-	0	0	N/A	+	0

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
BX39 – Land west of Ninfield Road (MIXED USE) (BEX0220)	500	-	-	-	0	-	0	-	0	--	+	0	--	+	+	-	-	0	-	0	0	N/A	-	-	-	0	+	0
BX40 – Land at Freezeland Farm, Freezeland Lane	This site has outline planning permission (RR/2023/1706/P)																											
BX41 – Former Sidley Sports Ground, Glovers Lane (BEX0032)	50	+	-	0	0	-	0	+	0	--	+	0	+	+	+	+	0	0	N/A	0	0	N/A	0	0	0	N/A	+	0
BX42 – Land adjacent to 276 Turkey Road (BEX0005)	30	+	-	-	-	-	0	+	0	--	+	0	+	+	+	+	0	0	0	0	0	N/A	-	--	0	N/A	+	0
BX43 – Cemetery Lodge, 250 Turkey Road	This site has planning permission (RR/2022/1233/P)																											
BX44 – Our Lady of the Rosary Church, Southlands Road	This site has planning permission (RR/2024/127/P)																											
BX45 – Land at Worsham Farm (east)	This site has planning permission (RR/2015/1760/P, RR/2022/2477/P, RR/2024/501/P)																											
BX46 – Land at Worsham Farm (west) (MIXED USE) (BEX0194)	66	+	0	-	0	-	0	+	0	--	+	0	+	+	+	+	0	0	--	0	0	N/A	-	--	0	N/A	+	0
BX50 – Land at Sidley Car Park, Ninfield Road (BEX0086)	10	+	0	0	0	0	+	+	0	--	+	0	+	+	+	+	0	0	N/A	0	0	N/A	+	++	0	N/A	+	0

Summary of SA scoring for Bexhill sub-area (proposed site allocations) – economic

SA Objective		Indicative floorspace	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing				SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference			1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b	
Bexhill																														
BX25 – Land at Barnhorn Green (BEX0021)	2,025	This site has planning permission (RR/2022/3018/P)																												
BX35 – Land at Levetts Wood and Oaktree Farm (BEX0017)	25,605	+	-	-	-	-	0	+	0	--	+	0	+	+	+	+	-	0	--	0	0	N/A	-	--	0	+	+	0		
BX47 – Plot 7, Bexhill Enterprise Park, Mount View Street (BEX0169)	15,000	+	-	-	0	--	0	+	0	--	+	0	+	+	+	+	0	0	-	0	0	N/A	-	--	0	+	+	0		
BX48 – Bexhill Enterprise Park – Escarpment Site B, south of Glovers End (BEX0246)	5,275	+	-	0	0	-	0	+	0	--	+	0	+	+	+	+	0	0	-	0	0	N/A	-	--	0	+	+	0		
BX49 – Land west of Bexhill Innovation Park, Glovers End (BEX0247)	4,200	+	-	0	0	0	0	+	0	--	+	0	+	+	+	+	0	0	-	0	0	N/A	-	--	0	+	+	0		

SA of the Southern Rother and Hastings Fringes sites



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

Crowhurst

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

Main sustainability issues

5.61. The main sustainability issues identified relate to the use of greenfield and Grade 3 agricultural land for new development. There are also some issues in relation to access to some services which impacts the overall sustainability of the settlement, but Crowhurst does contain a primary school and railway station. The proposed site allocations are located in the High Weald National Landscape.

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

assets. The proposed allocations are also not majorly impacted by flood risk issues; the rejected sites contain areas of land within Flood Zone 3.

Suggested mitigation measures

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

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

Fairlight

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

Main sustainability issues

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

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

Suggested mitigation measures

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

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

- Explore opportunities to improve access to local services.

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

5.68. Overall, the appraisal suggests there are a mix of likely positive, neutral and negative effects of the sites in Guestling parish. There are some significant negative effects identified in relation to the High Weald National Landscape and access to services in many parts the parish that are not directly contiguous with Hastings borough. There was a mix of effects regarding flood risk issues as well as access to open space throughout the Parish. There is one site proposed for allocation for employment uses and this site scored more positively by virtue of being in the Hastings Fringes and therefore being accessible to services and also having connections to the countryside, including Public Rights of Way.

Main sustainability issues

- 5.69. The main sustainability issues identified relate to the use of greenfield and Grade 3 agricultural land for new development as well as the surface water flood risk on some sites proposed for allocation. There are also some issues in relation to access to some services, chiefly essential services, in Guestling Green and Three Oaks, though Three Oaks does contain a railway station. All of the sites are located in the High Weald National Landscape, and some sites either contain or are adjacent to biodiversity features such as Ancient Woodland and Priority Habitats.
- 5.70. Sites generally scored positive on the appraisal in relation access to Public Rights of Way and they are not significantly constrained by the presence of heritage assets, though some sites are in close proximity. There are also limited risks from ground water flooding.

Suggested mitigation measures

- 5.71. The following measures are suggested to help avoid or mitigate negative impacts and improve overall sustainability of the sites in Guestling parish:
- Landscape and visual impact assessment in relation to HWNL and local character.
 - Requirements for the protection of habitats sites, with appropriate buffers between the built area.
 - Site specific Flood Risk Assessment and the incorporation of SuDS in the development.
 - On-site provision of outdoor amenity space, and/or contributions to public open space.
 - Explore opportunities to improve access to local services.

Icklesham (only including Icklesham village)

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

Main sustainability issues

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

Suggested mitigation measures

- 5.75. The following measures are suggested to help avoid or mitigate negative impacts and improve overall sustainability of the sites in Icklesham village:
- Landscape and visual impact assessment in relation to HWNL and local character.
 - Requirements for the protection of habitats sites, with appropriate buffers between the built area.
 - Site specific Flood Risk Assessment and the incorporation of SuDS in the development.
 - On-site provision of outdoor amenity space, and/or contributions to public open space.
 - Explore opportunities to improve access to local services.

Pett

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

Main sustainability issues

- 5.77. The main sustainability issues identified relate to the use of fully or majority greenfield and Grade 3 agricultural land, as well as the surface water flood risk on some of the sites assessed. There are also some issues in relation to access to some services, chiefly essential services, in the Parish. All of the sites are located in the High Weald National Landscape, and some sites either contain or are adjacent to biodiversity features such as Ancient Woodland and Priority Habitats.
- 5.78. Sites generally scored positive on the appraisal in relation access to Open Space and Public Rights of Way and they are generally not constrained by the presence of heritage assets.

Suggested mitigation measures

- 5.79. While there are no proposed site allocations in Pett parish, the following measures would be suggested to help avoid or mitigate negative impacts and improve overall sustainability of sites, should any rejected sites be brought forward:
- Landscape and visual impact assessment in relation to HWNL and local character.
 - Requirements for the protection of habitats sites, with appropriate buffers between the built area.
 - Site specific Flood Risk Assessment and the incorporation of SuDS in the development.
 - Explore opportunities to improve access to local services.

Westfield

- 5.80. Overall, the appraisal suggests there are a mix of likely positive, neutral and negative effects of the sites in Westfield parish. There are some significant negative effects identified in relation to the High Weald National Landscape and some biodiversity and surface water flooding issues on some sites. There was also a mix of effects regarding other forms of flood risk issues. One site proposed for residential development is on a brownfield site but does contain an existing employment use.

Main sustainability issues

- 5.81. The main sustainability issues identified relate to the use of fully or majority greenfield and mainly Grade 3 agricultural land, as well as the surface water flood risk on some of the sites assessed. There are also some issues in relation to access to some services, chiefly public transport, in Westfield village and the access to a range of essential services on those sites contiguous and closer to Hastings borough. Most of the sites are located in the High Weald National Landscape and some sites either contain or are adjacent to biodiversity features such as Ancient Woodland and Priority Habitats. A number of sites are also within an Archaeological Notification Area.

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

Suggested mitigation measures

- 5.83. The following measures are suggested to help avoid or mitigate negative impacts and improve overall sustainability of the sites in Westfield parish:
- Landscape and visual impact assessment in relation to HWNL and local character.
 - Requirements for the protection of habitats sites, with appropriate buffers between the built area.
 - Site specific Flood Risk Assessment and the incorporation of SuDS in the development.
 - Archaeological Surveys in relation to sites within Archaeological Notification Areas.

Summary of SA scoring for Southern Rother and the Hastings Fringes sub-area (proposed site allocations) - residential

Significant positive	Minor positive	Neutral or uncertain	Minor negative	Significant negative
++	+	0	-	--

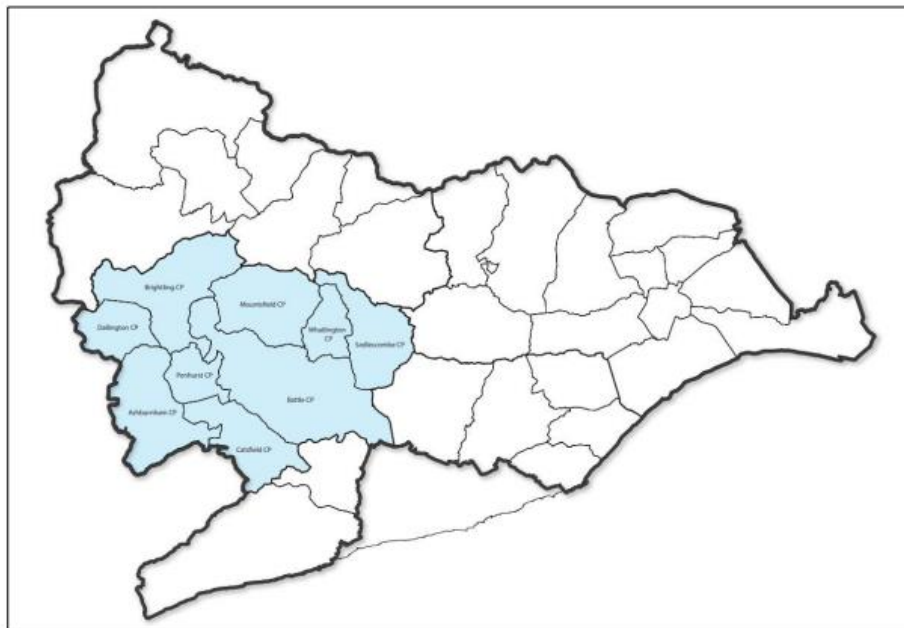
SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
Southern Rother and the Hastings Fringes																												
Crowhurst																												
CR1 - Land at Station Road and Forewood Lane	25	0	-	0	0	0	0	0	0	+	0	0	-	+	+	0	-	0	-	0	--	-	N/A	--	0	N/A	+	N/A
CR2 - Land south of Forewood Rise	18	0	-	0	0	0	0	0	0	+	0	0	-	+	+	0	0	0	0	0	--	-	N/A	--	0	N/A	+	N/A
CR3 - Land adjacent to Station Car Park	6	0	-	0	0	0	0	0	0	+	+	0	-	+	+	0	0	0	-	0	--	0	N/A	--	0	N/A	+	N/A
Fairlight																												
FA1 - Land east of Waites Lane	35	0	-	0	0	-	0	0	0	--	+	0	0	+	+	0	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A
Guestling																												
GU2 - Brackendale, Rock Lane	20	+	0	0	0	0	0	+	0	--	+	0	+	-	+	+	0	0	0	0	--	-	N/A	-	0	N/A	+	N/A
GU4 - Wild Meadows, Chapel Lane	20	-	-	0	0	0	0	-	0	--	+	0	--	+	+	-	-	0	-	0	--	-	N/A	-	0	N/A	+	N/A
GU5 - Former Guestling Highways Depot	8	-	-	0	0	0	0	-	0	0	+	0	--	+	+	-	-	0	-	0	--	0	N/A	++	0	N/A	+	N/A
GU6 - Field at Halfhouse, Butchers Lane	12	-	0	-	0	-	0	-	0	+	+	0	--	-	+	-	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A
Icklesham																												

IK1 - Land adjacent to Little Sherwood Industry Park	26	0	-	0	0	0	0	0	0	0	+	0	0	-	-	+	0	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A
IK2 - Land adjacent to Orchard Close	32	0	-	0	0	-	0	0	0	0	--	-	0	-	0	+	0	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A
Westfield																													
WS1 - Land at Michael Tyler Furniture, Woodlands Way	40	0	0	-	0	--	0	0	0	0	0	-	0	-	+	+	0	0	0	-	0	-	N/A	0	++	--	N/A	+	N/A
WS2 - Land east of Beaney’s Lane	70	0	0	--	0	--	0	0	0	0	--	-	0	-	+	+	0	0	0	0	0	--	-	N/A	-	0	N/A	+	N/A
WS3 - Land at Moor Farm	50	+	0	0	0	0	0	0	+	0	0	+	0	+	+	+	+	-	-	-	0	--	-	N/A	--	0	N/A	0	N/A
WS4 - Land on east side of Cottage Lane	RR/2022/1118/P (outline planning permission for 20 dwellings)																												

Summary of SA scoring for Southern Rother and the Hastings Fringes sub-area (proposed site allocations) – economic development

SA Objective		Indicative floorspace	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference			1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
Southern Rother and the Hastings Fringes																													
Guestling																													
GU1 - Land north of A265, Ivyhouse Lane, Hastings	3,300	+	-	0	0	-	0	+	0	+	+	0	+	0	+	+	+	0	0	-	0	--	0	N/A	--	0	+	+	N/A
Westfield																													
WS5 - Freshfields Farm, Westfield Lane, Westfield	2,000	0	-	0	0	0	0	0	0	0	+	+	0	0	+	+	0	0	0	-	0	--	0	N/A	--	0	+	0	N/A

SA of the Battle and Surrounding Settlements sites



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

Ashburnham

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

Main sustainability issues

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

Suggested mitigation measures

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

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

Brightling

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

Main sustainability issues

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

Suggested mitigation measures

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

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

Battle

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

Main sustainability issues

- 5.93. The sustainability issues affecting the proposed allocated sites include, for some sites, biodiversity, flooding and heritage impacts, impacts on greenfield and agricultural land, and landscape sensitivity in the High Weald National Landscape. However, flooding constraints often affected only small parts of sites and heritage impacts were in relation to minor negative scores. Proposed allocated sites generally scored positively in relation to access to public open space and Public Rights of Way, they did not have groundwater flooding issues and scored positively on being in a sustainable location.
- 5.94. Sustainability issues identified for the rejected sites in this area include negative scores associated with biodiversity, flooding, heritage, impacts of developing greenfield and agricultural land, landscape sensitivity in the High Weald National Landscape. These sites generally scored positively on the appraisal in relation to access to public open space and Public Rights of Way, and they did not have groundwater flooding constraints. The majority of sites are located within, or in very close proximity to, the settlement of Battle, with those scoring major negative for service provision being within the parish of Battle, but not near the settlement of Battle.

Suggested mitigation measures

- 5.95. The following measures are suggested to help avoid or mitigate negative impacts and improve overall sustainability of the sites in Battle:
- The protection of biodiversity features and inclusion of green infrastructure and land for BNG within sites, to help mitigate the loss of biodiversity, greenfield and agricultural land
 - The protection of landscape features and inclusion of landscaping as part of development proposals
 - The protection of the setting of heritage assets
 - Measures to mitigate flood risks, particularly avoiding development in areas of sites which are at risk of flooding, and the inclusion of appropriate SuDS

Catsfield

- 5.96. There are a mix of positive, neutral and negative scores for proposed allocation sites in Catsfield, all of which are within or adjacent to the High Weald National Landscape. There are no significant positive effects, but some sites do have significant negative scores relating to risks of flooding (surface water flooding), impacts on greenfield land and landscape sensitivity.
- 5.97. The pattern of scores for the rejected sites in this area, all of which are in the High Weald National Landscape, are similar to the proposed sites, with a mixture of positive, neutral and negative effects, no significant positive effects but some significant negative effects affecting some sites, particularly relating to lack of service provision and impacts on biodiversity, flood risk (surface water flooding), greenfield land and landscape sensitivity.

Main sustainability issues

- 5.98. The sustainability issues affecting the proposed allocated sites include, for some sites, biodiversity, flooding (surface water), heritage, greenfield and agricultural land, service frequency and landscape sensitivity in the High Weald National Landscape. Proposed allocated sites generally scored positively in relation to access to public open space and Public Rights of Way, and scored neutrally in terms of access to essential services.
- 5.99. Sustainability issues identified for the rejected sites in this area include negative scores associated with biodiversity, flooding, impacts of developing greenfield and agricultural land, landscape sensitivity in the High Weald National Landscape. These sites generally scored positively on the appraisal in relation to access to public open space and Public Rights of Way, and they did not have groundwater flooding constraints. Some of the sites are located near to the settlement of Catsfield and so have moderate access to essential services, with the remaining sites being located away from the settlement services in more remote areas of the parish.

Suggested mitigation measures

- 5.100. The following measures are suggested to help avoid or mitigate negative impacts and improve overall sustainability of the sites in Catsfield:
- The protection of biodiversity features and inclusion of green infrastructure and land for BNG within sites, to help mitigate the loss of biodiversity, greenfield and agricultural land.
 - The protection of landscape features and inclusion of landscaping as part of development proposals.
 - The protection of the setting of heritage assets.
 - Measures to mitigate flood risks, particularly avoiding development in areas of sites which are at risk of flooding, and the inclusion of appropriate SuDS.

Dallington

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

Main sustainability issues

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

Suggested mitigation measures

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

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

Mountfield

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

Main sustainability issues

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

Suggested mitigation measures

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

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

Netherfield

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

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

Main sustainability issues

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

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

Suggested mitigation measures

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

- The inclusion of green infrastructure and land for BNG within sites, to help mitigate the loss of biodiversity, greenfield and agricultural land

- The protection of landscape features and inclusion of landscaping as part of development proposals

Sedlescombe

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

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

Main sustainability issues

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

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

Suggested mitigation measures

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

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

- Measures to mitigate flood risks, particularly avoiding development in areas of sites which are at risk of flooding, and the inclusion of appropriate SuDS.

Summary of SA scoring for Battle and Surrounding Settlements sub-area (proposed site allocations) – residential

Significant positive	Minor positive	Neutral or uncertain	Minor negative	Significant negative
++	+	0	-	--

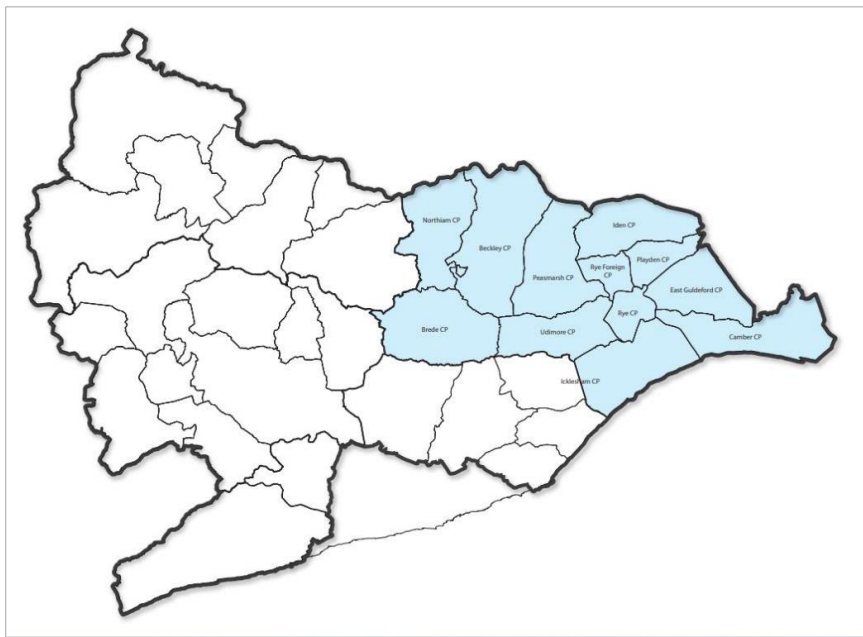
SA Objective																												
	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
Battle and surrounding settlements																												
Battle																												
BT1 - Land south of Hastings Road	220	+	0	-	0	--	0	+	0	--	+	0	+	-	+	+	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A
BT2 – Land at Breadsell	145	--	-	-	0	-	0	--	0	0	+	0	+	-	+	--	0	0	-	0	--	-	N/A	--	0	N/A	--	N/A
BT4 – Land at Caldbec House	5	+	0	0	0	0	0	+	0	0	+	0	+	+	+	+	0	-	N/A	0	--	0	N/A	-	0	N/A	+	N/A
BT6 – Land at Sunny Rise	10	+	0	-	0	-	0	+	0	0	+	0	+	-	-	+	-	-	0	0	--	0	N/A	--	0	N/A	+	N/A
BT7 – Land at Almonry Farm	80	+	0	-	0	-	0	+	0	--	+	0	+	+	+	+	-	0	-	0	--	-	N/A	--	0	N/A	+	N/A
BT8 – Land adjacent to 1 Loose Farm Cottages	5	+	0	0	0	0	0	+	0	0	+	0	+	-	-	+	0	0	-	0	--	0	N/A	-	0	N/A	+	N/A
BT9 – Land east of Coronation Gardens	75	+	0	0	0	-	0	+	0	--	+	0	+	+	+	+	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A
BT10 – Land adjoining Little Brans	65	+	0	-	0	-	0	+	0	--	+	0	+	-	+	+	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A
BT11 – Battle Market Square	52	+	0	0	0	0	0	+	0	-	+	0	+	+	+	+	-	-	N/A	0	--	+	N/A	++	--	0	+	N/A
Catsfield																												
CT1 – Land west of B2204	30	-	0	0	0	0	0	-	0	-	+	0	0	-	+	-	-	0	-	0	--	-	N/A	--	0	N/A	0	N/A

CT2 – Land south of Wilton House Equestrian Centre	20	-	-	0	0	0	0	-	0	-	+	0	0	-	+	-	-	0	-	0	--	-	N/A	--	0	N/A	0	N/A
CT3 – Land south of Church Road	35	-	-	-	0	-	0	-	0	--	+	0	0	+	+	-	-	0	-	0	-	N/A	-	--	0	N/A	0	N/A
Netherfield																												
NE1 – Swallow Barn	10	-	0	0	0	0	0	-	0	0	+	0	0	+	-	-	0	0	N/A	0	--	-	N/A	0	0	N/A	--	N/A
NE2 – White House Poultry Farm	Planning reference – RR/2023/164/P																											
Sedlescombe																												
SD1 – Land at Sunningdale	Planning reference – RR/2019/2485/P																											
SD2 – Land at Church Hill Farm	12	0	0	0	0	-	0	0	0	--	+	0	+	+	+	0	0	-	-	0	--	-	N/A	--	0	N/A	0	N/A
SD3 – Land at Sedlescombe Sawmills	8	--	0	-	0	--	0	--	0	0	+	0	--	-	+	--	0	-	N/A	0	--	0	N/A	+	--	0	--	N/A
SD4 – Land adjacent to St John the Baptist Church	17	0	0	0	0	0	0	0	0	0	+	0	+	+	-	0	0	-	-	0	--	0	N/A	--	0	N/A	0	N/A
SD5 – Land at Gate Cottage	Planning reference – RR/2023/1406/P																											
SD6 – Land at Church Hill Farm	10	0	0	0	0	0	0	0	0	0	+	0	+	+	+	0	0	-	-	0	--	0	N/A	--	0	N/A	0	N/A
SD7 – Street Farm	Planning reference – RR/2022/2619/P																											
SD10 – Land north of Gorselands	15	0	-	0	0	-	0	0	0	--	+	0	+	+	+	0	0	0	0	0	--	-	N/A	--	0	N/A	0	N/A
SD11 – Land north of Brede Lane	38	0	0	-	0	-	0	0	0	0	+	0	+	+	+	0	0	0	0	0	--	-	N/A	--	0	N/A	0	N/A

Summary of SA scoring for Battle and Surrounding Settlements sub-area (proposed site allocations) – economic development

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

SA of the Rye and Eastern Settlements Cluster sites



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

Beckley

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

Main sustainability issues

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

Suggested mitigation measures

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

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

Brede

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

Main sustainability issues

5.122. The Settlement Study assesses settlements within the parish as being potentially sustainability, reflected in the associated SA scores. Despite many neutral scores, the sites score well for access to open space, and PROWs, however certain sites are located to ancient woodland or priority habitats, giving a negative score. The location of the parish in the High Weald National Landscape results in significant negative scores for landscape sensitivity. The parish scores neutrally for heritage. On flooding, the parish scores both neutral and minor positive, indicating clearly that this is not a local issue.

Suggested mitigation measures

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

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

Camber

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

Main sustainability issues

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

Suggested mitigation measures

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

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

Icklesham (Rye Harbour)

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

Main sustainability issues

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

Suggested mitigation measures

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

- Site specific Flood Risk Assessment and the incorporation of SuDS in the development.
- Explore opportunities to access essential local services.
- Heritage impact statement for the listed building.

Iden

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

Main sustainability issues

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

Suggested mitigation measures

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

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

Northiam

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

Main sustainability issues

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

Suggested mitigation measures

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

- Landscape and visual impact assessment in relation to HWNL and local character.

- Heritage impact statements for development in the proximity of listed buildings.

Peasmarsch

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

Main sustainability issues

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

Suggested mitigation measures

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

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

Playden

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

Main sustainability issues

5.140. The sites are not located in the National Landscape but have still been assessed as having a minor negative impact on the landscape. The biodiversity criteria have all neutral scores. There is surface water flooding risk on the proposed allocation sites. Health and well-being criteria are varied with the sites being located in a moderately sustainable location but with negative access to open space and positive access to PROWs. There is some negative impact on listed buildings.

Suggested mitigation measures

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

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

Rye

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

Main sustainability issues

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

Suggested mitigation measures

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

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

Rye Foreign

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

Main sustainability issues

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

Suggested mitigation measures

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

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

Udimore

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

Main sustainability issues

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

Suggested mitigation measures

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

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

Summary of SA scoring for Rye and Eastern Settlements sub-area (proposed site allocations) – residential

Significant positive	Minor positive	Neutral or uncertain	Minor negative	Significant negative
++	+	0	-	--

SA Objective		Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference			1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
Rye and the Eastern Settlements																													
Beckley																													
BC1 Land south and west of Buddens Green, Beckley Four Oaks	25	-	0	0	0	0	0	0	-	0	0	+	0	-	+	+	-	-	0	-	0	--	-	N/A	--	0	N/A	0	N/A
BC2 Land East of Hobbs Lane, Beckley Four Oaks	23	-	0	0	0	0	0	0	-	0	0	+	0	-	+	+	-	0	0	-	0	--	-	N/A	--	0	N/A	0	N/A
BC4 Land west of Oaklea Cottages, Beckley Four Oaks	13	-	0	0	0	0	0	0	-	0	+	+	0	-	+	+	-	-	0	-	0	--	-	N/A	--	0	N/A	0	N/A
Brede																													
BR1 Land west of A28, Northiam Rd	29	0	0	-	0	-	0	0	0	0	-	+	0	+	+	+	0	0	0	0	0	--	-	N/A	--	0	N/A	0	N/A
BR2 Land west of Tillingham View	35	0	0	-	0	-	0	0	0	0	0	0	0	+	+	+	0	0	0	0	0	--	-	N/A	0	0	N/A	0	N/A
BR3 Land at Broad Oak Lodge, Chitcombe Road	20	0	0	-	-	-	0	0	0	0	--	0	0	+	+	+	0	0	0	0	0	--	-	N/A	0	0	N/A	0	N/A
Camber																													
CM1 Land at the Former Putting Green Site, Old Lydd Road	10	+	-	0	0	-	0	+	0	0	-	0	0	+	+	+	+	0	0	-	0	0	N/A	-	++	0	N/A	+	N/A
CM3 Lydd Road Garage, Lydd Road	5	+	-	0	0	0	0	+	--	0	-	0	0	+	+	+	+	0	0	-	0	0	N/A	0	++	0	N/A	+	N/A
Icklesham																													

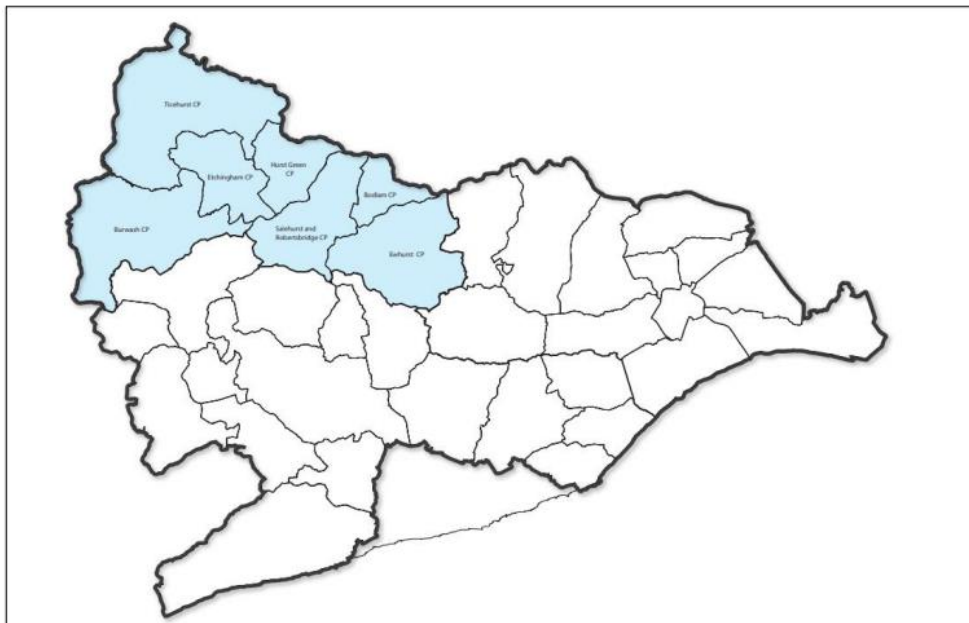
RH1 Stoneworks Cottages, Rye Harbour	40	0	-	0	0	0	0	0	0	--	+	--	0	-	+	+	0	-	0	N/A	0	0	N/A	0	+	0	N/A	0	N/A
Iden																													
ID1 Land south of Elmsmead	15	-	0	0	0	0	0	0	-	0	+	+	0	0	-	+	-	-	-	-	0	--	-	N/A	--	0	N/A	0	N/A
ID2 Land at Street Field, Main Street	10	-	0	0	0	0	0	0	-	0	+	+	0	0	-	+	-	-	-	-	0	--	-	N/A	--	0	N/A	0	N/A
Northiam																													
NR1 Land south of Northiam Church of England Primary School, Northiam	7	+	0	0	-	0	0	0	+	0	+	+	0	++	-	+	+	-	0	-	0	--	0	N/A	--	0	N/A	0	N/A
NR2 Land at Egmont Farm, Station Road	25	+	0	-	0	0	0	0	+	0	+	+	0	++	-	+	+	0	0	-	0	--	-	N/A	+	0	N/A	0	N/A
Peasmarsh																													
PE1 Land south of Main Street	70	0	0	-	0	-	0	0	0	0	+	+	0	++	+	+	0	-	0	-	0	--	-	N/A	0	0	N/A	0	N/A
PE2 Land south of Main Street	45	0	0	-	-	-	0	0	0	0	+	+	0	++	+	+	0	-	0	-	0	--	-	N/A	0	0	N/A	0	N/A
PE3 Tanyard, Main Street	15	0	0	-	0	-	0	0	0	0	+	+	0	++	+	+	0	-	0	-	0	--	-	N/A	--	0	N/A	0	N/A
PE4 Land East of Orchard Way	7	0	0	0	0	0	0	0	0	0	-	+	0	++	+	+	0	-	0	-	0	--	-	N/A	--	0	N/A	0	N/A
PE5 Land at Malthouse Business Park, The Maltings	6	0	0	-	0	-	0	0	0	0	+	+	0	++	+	+	0	0	0	-	0	--	-	N/A	++	--	0	0	N/A
Playden																													
PL1 Land South of Poppyfields and Corner House (combined)	25	+	0	0	0	0	0	0	+	0	-	+	0	+	-	+	+	-	0	-	0	0	N/A	-	0	0	N/A	+	N/A
PL2 Land between Saltcote and The Steps	14	+	-	0	0	0	0	0	+	0	-	+	0	+	-	+	+	-	-	N/A Urban	0	0	N/A	-	--	0	N/A	+	N/A
Rye																													
RY1 Former Tilling Green School	25	++	-	0	0	0	0	0	++	--	0	0	0	++	+	+	++	0	0	+urban	0	0	N/A	0	++	0	N/A	++	N/A
RY2 Winchelsea Road (East side)	10	++	0	0	0	0	0	0	++	0	+	+	0	++	+	+	++	-	-	+Urb	0	0	N/A	0	++	--	0	++	N/A
RY3 Winchelsea Road (West side)	59	++	0	0	0	-	0	0	++	--	0	+	0	++	+	+	++	-	0	+	0	0	N/A	0	++	--	0	++	N/A
RY4 Rye Creative Centre	40	++	0	0	0	0	0	0	++	--	+	+	0	++	+	+	++	0	0	+	0	0	N/A	0	++	0	N/A	++	N/A
RY5 Rock Channel Site A	80	0	0	0	0	0	0	0	++	--	--	+	0	++	+	+	++	0	0	+	0	0	N/A	0	++	--	0	++	N/A

RY6 Former Council Depot, Cyprus Place	7	++	0	0	0	0	0	++	0	+	+	0	++	+	+	++	-	-	+	0	0	N/A	+	++	-	N/A	++	N/A
RY8 17-19 Tower Street	6	++	0	0	0	0	0	++	0	+	+		++	+	+	++	--	-	+	0	0	N/A	+	++	-	N/A	++	N/A

Summary of SA scoring for Rye and Eastern Settlements sub-area (proposed site allocations) – economic development

SA Objective	Indicative floorspace	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
Rye and the Eastern settlements																												
Camber																												
CM2 Land at the Central Car Park, Old Lydd Road, Camber		+	-	0	0	-	0	+	--	+	0	0	+	+	+	+	0	0	-	0	0	N/A	-	++	0	N/A	+	N/A
Icklesham																												
RH2 Employment Land, Harbour Road		0	0	0	0	0	0	0	--	+	+	0	-	-	+	0	0	0	0	0	0	N/A	0	++	--	0	0	N/A
Rye																												
RY7 - Rye Boatyard, Rock Channel (RR/2020/334/P recently expired)		0	0	0	0	0	0	++	--	+	+	0	++	+	+	++	0	0	0	0	0	N/A	0	++	--	N/A	++	N/A

SA of the Northern Rother sites



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

Burwash & Burwash Common

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

Main sustainability issues

5.152. The main sustainability issues identified relate to the presence of ancient woodland or priority habitats on some sites, the use of greenfield and Grade 3 agricultural land for new development, and surface water flood risk. There are also some issues in relation to access to services, in particular for Burwash Common. The site allocations are located in the High Weald National Landscape, and one site in its entirety is considered to have a high landscape sensitivity.

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

Suggested mitigation measures

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

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

Etchingham

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

Main sustainability issues

5.156. The main sustainability issues identified relate to the presence of Flood Zone 2 & 3 and surface water flood risk, the use of greenfield and some Grade 3 agricultural land for new development. The proposed site allocations are located in the High Weald National Landscape, and one site in its entirety is considered to have a high landscape sensitivity while also containing priority habitat.

5.157. Etchingham sites generally scored positive on the appraisal in relation to the settlement's overall sustainability, including access to public transport, as well as access to open space and Public Rights of Way. Sites are not significantly constrained by the presence of heritage assets.

Suggested mitigation measures

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

- Landscape and visual impact assessment in relation to the National Landscape and local character.
- Requirements for habitats sites, with appropriate buffers between the built area.
- Explore opportunities for on-site biodiversity net gain, including woodland and habitat sites.

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

Hurst Green

5.159. Overall, the appraisal suggests there are a mix of likely positive, neutral and negative effects of the sites in Hurst Green parish. There are some significant negative effects identified in relation to biodiversity, landscape impacts, flood risk and health and wellbeing.

Main sustainability issues

5.160. The main sustainability issues identified relate to the presence of priority habitat within some sites, the use of greenfield and Grade 3 agricultural land for new development, and surface water flood risk. There are also some issues in relation to access to essential services where sites are located outside the village. The site allocations are located in the High Weald National Landscape, and there are some sites that are considered to have high landscape sensitivity.

5.161. Sites generally scored positive on the appraisal in relation to access to public transport, as well as access to open space and Public Rights of Way. Sites do not appear to be constrained by the presence of heritage assets.

Suggested mitigation measures

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

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

Robertsbridge and the wider Salehurst Parish

5.163. Overall, the appraisal suggests there are a mix of likely positive, neutral and negative effects of the sites in Salehurst and Robertsbridge parish. There are some significant negative effects identified in relation to biodiversity, landscape sensitivity, flood risk, heritage assets. Significant negative scores in relation to access to services also feature in the wider parish.

Main sustainability issues

5.164. The main sustainability issues identified relate to the presence Flood Zones 2 and 3 and surface water flood risk, of priority habitats on some sites, and the use of greenfield and Grade 3 agricultural land for new development. All sites are located in the High Weald National Landscape, and some sites form landscape of a high sensitivity. There are instances where sites contain or are adjacent to listed buildings, a Conservation Area, and an archaeological notification area. There are also some issues in relation to access to services and public transport where sites are located outside of the village.

5.165. Sites generally scored positive on the appraisal in relation to settlement sustainability, including access to public transport. There are also general positive scores for access to open space as well as Public Rights of Way.

Suggested mitigation measures

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

- Landscape and visual impact assessment in relation to HWNL and local character.
- Requirements for the protection of habitats sites, with appropriate buffers between the built area.
- Explore opportunities for on-site biodiversity net gain, including ancient woodland and habitat sites.
- Site specific Flood Risk Assessment and the incorporation of SuDS in the development.
- Requirement for archaeological assessments and a Heritage Impact Assessment to be undertaken (at the application stage)

Staplecross and the wider Ewhurst Parish

5.167. Overall, the appraisal indicates a mix of likely positive, neutral and negative effects of the sites in Ewhurst parish. There are some significant negative effects identified in relation to flood risk and heritage.

Main sustainability issues

5.168. The main sustainability issues identified relate to the use of greenfield and Grade 3 agricultural land for new development, and surface water flood risk. The site allocations are located in the High Weald National Landscape. One proposed site allocation is within an archaeological notification area, and one rejected site contains a listed building. There are also some issues in relation to access to services for sites outside of Staplecross, while sites within Staplecross lack positive scores for overall settlement sustainability

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

Suggested mitigation measures

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

- Landscape and visual impact assessment in relation to HWNL and local character.
- Site specific Flood Risk Assessment and the incorporation of SuDS in the development.
- Requirement for archaeological assessments (at the application stage) and their incorporation in layouts and designs where necessary.
- Explore opportunities to improve access to local services.

Flimwell

5.171. Overall, the appraisal suggests there are a mix of likely positive, neutral and negative effects of the sites in Flimwell. There are some significant negative effects identified in relation to biodiversity, access to services and flood risk.

Main sustainability issues

5.172. The main sustainability issues identified relate to the presence of ancient woodland or priority habitats on some sites, the use of greenfield and Grade 3 agricultural land for new development, and surface water flood risk. There are also some issues in relation to access to services in the settlement. The site allocations are located in the High Weald National Landscape.

5.173. Sites generally scored positive on the appraisal in relation to access to public transport, access to open space as well as Public Rights of Way. Sites proposed for allocation are not constrained by the presence of heritage assets.

Suggested mitigation measures

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

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

- Explore opportunities to improve access to local services, seeking opportunities to make provision for shops or services in the settlement.

Ticehurst, and wider parish area (excluding Flimwell and Stonegate)

5.175. Overall, the appraisal shows there are a mix of likely positive, neutral and negative effects of the sites in Ticehurst. There are some significant negative effects identified in relation to flood risk.

Main sustainability issues

5.176. The main sustainability issues identified relate to the use of greenfield and Grade 3 agricultural land for new development, and surface water flood risk. The site allocations are located in the High Weald National Landscape. There are also some negative scores for priority habitat where adjacent or within the site. Sites proposed for allocation score a minor negative in relation to heritage assets where listed buildings are adjacent.

5.177. Sites within the village scored positively on the appraisal in relation settlement sustainability, both in relation to access to services and access to public transport, as well as access to open space Public Rights of Way.

Suggested mitigation measures

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

- Landscape and visual impact assessment in relation to HWNL and local character.
- Requirements for the protection of habitats sites, with appropriate buffers between the built area.
- Site specific Flood Risk Assessment and the incorporation of SuDS in the development.
- The requirement for site layouts to take account of adjacent heritage assets.

Stonegate

Overall, the appraisal suggests there are a mix of likely positive, neutral and negative effects of the sites in Stonegate. There are some significant negative effects identified in relation to services provision and biodiversity.

Main sustainability issues

5.179. The main sustainability issues identified relate to the lack of services within the settlement. A significant negative was scored due to the presence of TPOs along a site boundary. The use of greenfield and Grade 3 agricultural land for new development, and surface water flood risk are also issues. One site is also within a source protection zone. The site allocations are located in the High Weald National Landscape.

5.180. Sites generally scored positive on the appraisal in relation to access to open space as well as Public Rights of Way, and they are not significantly constrained by the presence of heritage assets. Sites also score positively for access to public transport due to the proximity of Stonegate train station.

Suggested mitigation measures

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

- Landscape and visual impact assessment in relation to National Landscape and local character.
- Requirements for the protection of TPOs, with appropriate buffers between the built area.
- Site specific Flood Risk Assessment and the incorporation of SuDS in the development.
- Explore opportunities to improve access to local services, seeking opportunities to make provision for shops or services in the settlement.
- Requirements that planning applications take account of the presence of source protection zone.

Summary of SA scoring for Northern Rother sub-area (proposed site allocations) – residential

Significant positive	Minor positive	Neutral or uncertain	Minor negative	Significant negative
++	+	0	-	--

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
Northern Rother																												
Burwash												N/A																
BW1 - Land north of Shrub Lane, Burwash	35	0	0	--	0	--	0	0	0	--	+	N/A	+	+	+	0	0	0	-	0	--	--	N/A	--	0	N/A	0	N/A
BW2 - Land at 101 Shrub Lane, Burwash	6	0	0	0	0	0	0	0	0	-	+	N/A	+	+	+	0	-	0	-	0	--	0	N/A	--	0	N/A	0	N/A
BW3 - Land east of Shrub Lane (north), Burwash	15	0	0	0	0	0	0	0	0	-	+	N/A	+	+	+	0	0	0	-	0	--	-	N/A	--	0	N/A	0	N/A
BW4 - Land east of Shrub Lane (south), Burwash	8	0	0	0	0	0	0	0	0	0	+	N/A	+	+	+	0	0	0	-	0	--	-	N/A	--	0	N/A	0	N/A
Burwash Common																												
BWC1 - Land south of Heathfield Road, Burwash Common	7	-	0	0	0	0	0	-	0	-	+	N/A	-	+	+	-	0	0	0	0	--	-	N/A	--	0	N/A	0	N/A
BWC - 2Old Orchard Nursery, Heathfield Road, Burwash Common	9	-	0	0	0	0	0	-	0	+	+	N/A	-	+	+	-	0	0	0	0	--	0	N/A	0	0	N/A	0	N/A
Etchingham																												
EC1 - Land at Oxenbridge Lane, Etchingham	10	+	0	0	0	0	0	+	--	-	+	N/A	0	+	+	+	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
EC2 - Land at Church Lane, Etchingham	5	+	0	0	0	0	0	+	--	--	+	N/A	0	+	+	+	0	0	0	0	--	-	N/A	-	0	N/A	+	N/A
EC3 - Croft Field, Etchingham	55	+	0	0	0	--	0	+	0	0	+	N/A	0	-	+	+	0	0	-	0	--	--	N/A	--	0	N/A	+	N/A
Hurst Green																												
HG1 - Land south of Iridge Place, London Road, Hurst Green	RR/2022/1526/P																											
HG2 - Land South of Lodge Farm, Hurst Green	RR/2021/2798/P																											
HG3 - Land to Rear of The Olde Bakery, London Rd, Hurst Green	35	0	0	0	0	-	0	0	0	--	+	N/A	-	+	+	0	-	0	-	0	--	0	N/A	--	0	N/A	+	N/A
HG4 - Land at The Lodge, London Road, Hurst Green	150	0	0	-	0	--	0	0	0	--	+	N/A	-	+	+	0	-	0	-	0	--	--	N/A	-	0	N/A	+	N/A
Robertsbridge																												
RB1 - Land south of Heathfield Gardens, Robertsbridge	65	+	0	0	0	0	0	+	0	--	+	N/A	+	+	+	+	0	0	-	-	--	-	N/A	--	0	N/A	+	N/A
RB2 - Grove Farm, Robertsbridge	RR/2017/1629/P & RR/2022/283/P, RR/2022/1850/P																											
RB3 - Land at Grove Farm (Phase 2), Robertsbridge	70	+	0	0	0	0	0	+	0	+	+	N/A	+	+	+	+	-	-	-	-	--	-	N/A	--	0	N/A	+	N/A
RB4 - Vicarage Land, Land south of the western end of Fair Lane, Robertsbridge	10	+	0	0	0	0	0	+	0	+	+	N/A	+	+	+	+	-	-	-	-	--	0	N/A	0	0	N/A	+	N/A
RB5 - Culverwells, Land north of Station Road, Robertsbridge	RR/2023/27/P																											
RB6a - Hodson's Mill, Northbridge Street, Robertsbridge	96	+	0	0	0	--	0	+	--	--	+	N/A	+	+	+	+	--	-	-	0	--	-	N/A	+	0	+	+	N/A
RB7b - Openfield, north of Northbridge Street, Robertsbridge (extension to Mill site)	50	+	0	0	0	--	0	+	0	+	0	N/A	+	+	+	+	0	-	-	0	--	--	N/A	--	0	N/A	+	N/A

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
Staplecross																												
SC1 - Land east of Stockwood Meadow, Northiam Road, Staplecross	25	0	0	0	0	0	0	0	0	--	+	N/A	0	+	+	0	0	0	-	0	--	-	N/A	--	0	N/A	0	N/A
SC2 - Land east of Hop Gardens, Northiam Road, Staplecross	8	0	0	0	0	0	0	0	0	+	+	N/A	0	+	+	0	-	0	-	0	--	-	N/A	--	0	N/A	0	N/A
Flimwell (and nearby countryside)																												
FW1 - Land rear of Fruitfields, High Street, Flimwell	32	0	0	--	0	--	0	0	0	--	+	N/A	--	+	+	0	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A
FW2 - Hawkhurst Road, Flimwell	114	0	0	-	0	-	0	0	0	-	+	N/A	--	+	+	0	-	0	-	0	--	-	N/A	-	-	0	+	N/A
Ticehurst																												
TC1 - Land at Steellands Farm, Field Rise, Ticehurst	54	+	0	0	0	0	0	+	0	0	+	N/A	+	+	+	+	-	0	-	0	--	0	N/A	--	-	N/A	+	N/A
TC2 - Orchard Farm, Ticehurst Village	5	+	0	0	0	-	0	+	0	--	+	N/A	+	+	+	+	0	0	-	0	--	0	N/A	--	0	N/A	+	N/A
Stonegate																												
SG1 - Land at Lymden Lane, Stonegate	42	-	0	0	0	0	0	-	0	+	+	N/A	--	+	+	-	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A
SG2 - Land east of Bardown Road, Stonegate	20	-	0	0	--	0	0	-	0	+	+	N/A	--	+	+	-	0	0	-	-	--	-	N/A	--	0	N/A	+	N/A

Summary of SA scoring for Northern Rother sub-area (proposed site allocations) – economic development

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
Battle and surrounding settlements																												
Flimwell (nearby countryside)																												
FW3 - Cedar Farm, London Road	1,500	--	0	--	0	--	0	--	0	--	+	N/A	--	-	+	--	0	0	-	0	--	0	N/A	-	-	0	0	N/A

SA of the Gypsy, Traveller and Travelling Showpeople Accommodation sites

5.182. The following section sets out the SA findings for the gypsy, traveller and travelling showpeople site options, focussing on the preferred options. The scoring tables for the proposed site allocations and rejected sites are set out at the end of this sub-section. The findings of this section should be distinguished from considerations for the spatial approach to meeting the needs of this group, as set out in the Development Strategy section of this report. Furthermore, unlike other allocations for proposed development, this section does not contain geographic sub-areas.

Findings for the district

5.183. Overall, the appraisal suggests there are a mix of likely positive, neutral and negative effects of the sites. There are some significant negative effects identified in relation to access to services and public transport, as well as for biodiversity, landscape and flood risk.

Main sustainability issues

5.184. The main sustainability issues identified relate to access essential services and public transport, due to the fact that gypsy and traveller sites are often located outside of settlements. There are also some issues in relation to priority habitat within the site, and ancient woodland being adjacent. Surface water flooding is occasionally an issue. The site allocations are located in the High Weald National Landscape.

5.185. At the same time some sites score positively against impacts on parks and countryside where they include brownfield areas and are well screened from the wider landscape. Sites generally scored positive on the appraisal in relation to access to open space as well as Public Rights of Way, and they are not significantly constrained by the presence of heritage assets.

Suggested mitigation measures

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

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

Reasonable alternatives sites?

5.187. While the SA Interim Report to support the 2024 Regulation 18 consultation noted that reasonable alternatives to identified gypsy and traveller sites would include those sites in existing temporary use for that purpose, suitable sites adjacent to existing permanent sites and other sites with an accepted willing landowner; since that time, further site assessment work has been undertaken, including the identification of additional sites. This has resulted in a suite of sites that are now proposed as allocations, together with additional sites that have been submitted through the Call for Sites (and are consequently understood to be available) but have been assessed as unsuitable through the site assessment process. Therefore, in the same way as the HELAA sites SA, these “rejected, submitted” sites are considered to be the “reasonable alternatives” which have been subject to SA, as detailed in the tables below. The approach suggested in the 2024 SA Interim Report has not been abandoned, however, as sites in temporary use, suitable sites adjacent to existing sites, and other sites with a willing landowner are all included within the suite of sites that have been assessed.

Summary of SA scoring for Gypsy, Traveller and Travelling Showpeople accommodation (proposed site allocations)

Significant positive	Minor positive	Neutral or uncertain	Minor negative	Significant negative
++	+	0	-	--

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
Gypsy, Traveller and Travelling Showpeople Sites – Proposed Allocations																												
GYP1 – Land adjacent to High Views, Loose Farm Lane, Battle		+	0	0	0	0	0	+	0	0	+	N/A	+	+	+	+	0	0	-	0	--	+	N/A	++	0	N/A	+	N/A
GYP2 – Land south of Hastings Road, Battle		+	0	0	0	0	0	+	0	0	+	N/A	+	+	+	+	0	0	-	0	--	+	N/A	++	0	N/A	+	N/A
GYP3 – Land on the east side of Kingwood Hill, Cackle Street, Brede		-	0	0	0	0	0	-	0	0	+	N/A	--	+	+	-	-	0	-	0	--	+	0	++	0	N/A	0	N/A
GYP4 – Land adjacent to Fir Tree Cottage, Netherfield Hill, Battle		--	0	-	0	-	0	--	0	--	+	N/A	--	-	+	--	0	0	-	0	--	0	N/A	+	0	N/A	--	N/A
GYP5 – Land south of Redlands Lane, Salehurst		+	0	0	0	--	0	+	0	--	0	N/A	+	+	+	--	0	0	-	0	--	0	N/A	0	0	N/A	+	N/A
GYP6 – Land adjacent to Valentine Ridge, A2100, Mountfield		--	0	-	0	-	0	--	0	0	+	N/A	--	+	+	--	0	0	-	0	--	0	N/A	0	0	N/A	--	N/A

Summary of SA scoring for Gypsy, Traveller and Travelling Showpeople accommodation (rejected sites)

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
Excluded Gypsy and Traveller Sites																												
GYP0002 – Land north of Broom Hill, Flimwell		0	0	-	0	0	0	0	0	--	+	N/A	--	+	+	0	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A
GYP0003 – The Hollies, The Mount, Flimwell		0	0	-	-	--	0	0	0	0	+	N/A	--	-	+	0	-	0	+	0	--	0	N/A	--	0	N/A	+	N/A

SA of the Area-based Policies

5.188. The draft Local Plan (2026) includes 9 ‘area-based’ policies which are specific to the Local Plan sub-areas. There are 4 policies which are proposed to be ‘saved’ and/or updated from the extant Local Plan and have therefore previously been subject to SA. However, in the interests of completeness, all of the proposed area-based policies have been subject to SA using the latest SA Framework. Further details on the proposed area-based policies are set out below.

5.189. The Council does not, at this point, consider that there are reasonable alternatives for these policies, as they will help give effect to the Development Strategy and alternatives would have therefore been considered more widely as part of its SA, apart from proposed Policy BX1 for the Bexhill Urban Area. In this case, the reasonable alternatives were assessed as part of the ‘residential density options’, set out earlier in this report.

Figure 30: Proposed Area-based policies

Policy reference	Title	Sub-area	Saved or new policy	Document
BX1	Bexhill Urban Area	Bexhill	New	N/A
BX2	Bexhill Cultural Area	Bexhill	Saved	Development and Site Allocations Local Plan (BEX15)
BX3	London Road-Sackville Road Enhancement Area	Bexhill	Saved	Development and Site Allocations Local Plan (BEX16)
BX4	Beeching Road Enhancement Area	Bexhill	New	N/A
BX18	West Bexhill Growth Area -Infrastructure Policy	Bexhill	New	N/A
BX29	North Bexhill Growth Area -Infrastructure Policy	Bexhill	New	N/A
BX30	Land south of Haven Brook Avenue - Infrastructure	Bexhill	Saved	Development and Site Allocations Local Plan (BEX3)
GU6	Rock Lane Urban Fringe Management Area	Southern Rother & Hastings Fringes	Saved	Development and Site Allocations Local Plan (HAS4)
TH3	Bowl Water	Northern Rother	New	N/A

Figure 31: Assessment of Area-based Policies

Area-based policies	Description	1 Air pollution	2 Biodiversity	3 Climate Change	4 Water Consumption	5 Flooding	6 Coastal Erosion	7 Health and Well-being	8 Housing	9 Accessibility to services	10 Safe Environments	11 Historic Environment	12 Pollution	13 Waste and Recycling	14 Water Pollution	15 Natural Landscape	16 Economic Performance	17 Employment Levels	18 Deprivation	19 Skills and Education	20 Transport	Score	Summary
BX1 – Bexhill Urban Area (New policy proposed in Regulation 18 Consultation)	This policy defines an urban area of Bexhill which is deemed to be within a reasonable walking distance to Bexhill railway station and Bexhill Town Centre. It sets additional policy requirements for new development, including on density requirements of new residential development.	+	+	++	0	+	0	+	++	++	0	+	+	0	0	0	0	+	0	0	++	15	This policy seeks to increase the number of residences within the urban area of Bexhill with high quality, higher density development that is accessible to existing public transport. This therefore positively meets many of the SA objectives that seek to encourage sustainable travel as well as encouraging a diversity of housing types. The policy also seeks that larger scale development incorporates a mix of uses which addresses objectives around access to services and employment opportunities. The policy cross-references other draft Local Plan policies on the historic environment.
BX2 – Bexhill Cultural Area (Policy carried forward from Development and Site Allocations Local Plan policy BEX15)	This policy designates a “cultural area” to afford the opportunity to focus the enhancement of the activity and facilities offer to improve patronage and the evening economy around the seafront as a significant amenity asset to the town.	0	0	0	0	0	0	+	0	+	0	++	0	0	0	+	++	+	0	0	0	8	This policy has a specific focus on seeking to improve arts, cultural and tourism activity in and around Bexhill seafront and the De La Warr Pavilion. Therefore, the benefits of this policy from when assessed against the SA Framework relate to the increased access and diversity of cultural heritage and the diversity of employment opportunities that would arise from new development supported by this policy. It is though neutral on many aspects.
BX3 – London Road-Sackville Road Enhancement Area (Policy carried forward from Development and	This policy identifies shortcomings in the appearance and operation of London Road, Buckhurst Place and Sackville Road as a gateway to the town, seafront and the De La Warr Pavilion.	0	0	+	0	0	0	+	+	++	0	0	0	0	0	0	++	+	0	0	+	9	This policy looks to enhance the townscape, public realm and living conditions. Therefore, the policy scores positively against the SA Framework on housing, employment and public realm

Area-based policies	Description	1 Air pollution	2 Biodiversity	3 Climate Change	4 Water Consumption	5 Flooding	6 Coastal Erosion	7 Health and Well-being	8 Housing	9 Accessibility to services	10 Safe Environments	11 Historic Environment	12 Pollution	13 Waste and Recycling	14 Water Pollution	15 Natural Landscape	16 Economic Performance	17 Employment Levels	18 Deprivation	19 Skills and Education	20 Transport	Score	Summary
Site Allocations Local Plan policy BEX16)																							related objectives but is neutral on many aspects.
BX4 – Beeching Road Enhancement Area (New policy proposed in Regulation 18 Consultation)	This policy supports delivery of the Bexhill-on-Sea Place Plan, including exemplar projects for creative workspace activation, public realm improvements, and employment intensification.	0	0	+	0	0	0	+	0	++	0	0	+	0	0	0	++	++	0	0	+	10	The policy primarily seeks to improve the employment and community uses within the Beeching Road area of Bexhill. The positive results from the SA Framework therefore are linked with these improvements, particularly as the Enhancement Area is brownfield land in a sustainable location of Bexhill. It is though neutral on many aspects.
BX18 – West Bexhill Growth Area - Infrastructure Policy (New policy proposed in Regulation 18 Consultation)	This policy requires that new development within the West Bexhill Growth Area will be coordinated through a master-planning approach. Proposals must appropriately contribute to the infrastructure required to create a sustainable community.	0	+	+	0	+	0	++	0	++	0	0	0	0	+	++	+	0	+	+	++	15	The policy sets out a range of infrastructure requirements to support the housing allocations proposed in the wider West Bexhill area. The policy criteria include a focus on active travel, green and blue infrastructure and the provision of a new GP and primary school (with nursery provision). As such, there are many positive aspects when assessed against the SA Framework.
BX29 – North Bexhill Growth Area - Infrastructure Policy (New policy proposed in Regulation 18 Consultation)	This policy requires that new development within the North Bexhill Growth Area will be coordinated through a master-planning approach. Proposals must appropriately contribute to the infrastructure required to create a sustainable community.	0	+	+	0	+	0	++	0	++	0	0	0	0	+	++	+	0	+	+	++	15	The policy sets out a range of infrastructure requirements to support the housing allocations proposed in the wider North Bexhill area. The policy criteria include a focus on active travel, green and blue infrastructure and the provision of new medical facilities and primary school (with nursery provision). As such, there are many positive aspects when assessed against the SA Framework.
BX30 – Land south of Haven Brook Avenue - Infrastructure	This policy augments policy BX29 by requiring specific infrastructure	0	+	+	0	+	0	+	0	+	0	0	0	0	+	++	0	0	0	0	+	9	This policy covers certain sites within the wider North Bexhill Growth Area and the specific infrastructure requirements that

Area-based policies	Description	1 Air pollution	2 Biodiversity	3 Climate Change	4 Water Consumption	5 Flooding	6 Coastal Erosion	7 Health and Well-being	8 Housing	9 Accessibility to services	10 Safe Environments	11 Historic Environment	12 Pollution	13 Waste and Recycling	14 Water Pollution	15 Natural Landscape	16 Economic Performance	17 Employment Levels	18 Deprivation	19 Skills and Education	20 Transport	Score	Summary
(Policy carried forward from Development and Site Allocations Local Plan policy BEX3 but scopes in more sites)	requirements on four adjacent proposed allocations in North Bexhill.																						are sought on these sites, for example playing pitches and a green corridor. This policy acts alongside proposed policy BX29 and therefore scores relatively lower against the SA Framework due to this targeted focus but still contains a number of positive benefits.
GU6 – Rock Lane Urban Fringe Management Area (Policy carried forward from Development and Site Allocations Local Plan policy HAS4)	The Rock Lane Urban Fringe Management Area is on the boundary with Hastings to facilitate the creation of an area of multifunctional green space as a buffer between town and countryside.	0	++	0	0	+	0	+	0	+	0	0	0	0	+	++	0	0	0	0	+	9	The policy sets out criteria where landscape management proposals would be supported to improve green infrastructure and access to the countryside and therefore the policy scores positively on these related objectives. It also restricts development that would harm the openness of the countryside. It is though neutral on many aspects.
TH3 – Bewl Water (New policy proposed in Regulation 18 Consultation)	This policy highlights the special landscape and ecological qualities of Bewl Water and to support appropriate recreational uses.	0	++	0	0	0	0	+	0	0	0	0	0	0	0	++	+	0	0	0	0	6	This policy has a relatively narrow focus on conserving and enhancing the natural landscape, biodiversity and ecology of Bewl Water and it therefore mainly scores positively on these objectives within the SA. The policy does also allow for appropriate recreational uses which is reflected through the health and wellbeing and employment objectives. It is though neutral on many aspects due to this targeted focus.

Figure 32: Summary of Assessment of Area-based Policies

Area-based policies	Score	1. Does this have a significant effect on the SA objective(s), whether positive or negative? State Y/N	2. Is the likely Impact? Negative (-1)	2. Is the likely Impact? Neutral (0)	2. Is the likely Impact? Positive (1)	3. Is this a temporary or permanent Impact? State T or P	4. Is this a short term or long term impact? State ST or LT	5. Are there synergies between other policies (or options) which might amplify the effect? State Y or N	6. Commentary/Notes Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score
BX1 – Bexhill Urban Area	15	Y			Y	P	LT	Y	This policy mainly looks to focus development within the urban area of Bexhill with its existing range of services and public transport options. Therefore, new development in this area will have positive, long term, permanent impact on this area of Bexhill. Improvements to pedestrian and cycle infrastructure will further create positive longer term improvements. No negative impacts have been identified. This policy has synergies with policies HER1, ECO3 and BX4 as these have direct relevance to areas within this policy and have been referenced within this proposed policy.
BX2 – Bexhill Cultural Area	8	Y			Y	P	LT	Y	This policy seeks to improve the cultural and tourism offer in Bexhill as well as improving the promenade and public realm. No negative impacts have been identified. These improvements are therefore longer term for when the appropriate development proposals come forward. Some improvements to the public realm could occur in the shorter term too. Synergies with other policies include other tourism related policies, for example.
BX3 – London Road- Sackville Road Enhancement Area	9	Y			Y	P	LT	Y	This policy aspires to improve the public realm, commercial environment and living conditions of those who live, work and visit the parts of Bexhill within the policy area. Therefore, these improvements could occur in the short and long term but will have a longer term and permanent impact. No negative impacts have been identified. Policies previously consulted on in relation to public realm and active travel as well as supporting new employment development have synergies with this policy.
BX4 – Beeching Road Enhancement Area	10	Y			Y	P	LT	Y	This predominately employment and community use focused policy seeks to enhance the Beeching Road area which will likely materialise in the longer term. Some of the public realm improvements could be seen in the shorter term but this may be dependent on new development coming forward to provide these. No negative impacts have been identified. This policy makes direct reference to policy LWL5 (Distinctive Places) and also relates to proposed allocation BX5.
BX18 – West Bexhill Growth Area - Infrastructure Policy	15	Y			Y	P	LT	Y	This policy focuses on a wide range of infrastructure required to support new development in the area and is therefore mainly linked with the range of proposed allocations coming forward to deliver the relevant improvements. This therefore is more likely to

Area-based policies	Score	1. Does this have a <u>significant</u> effect on the SA objective(s), whether positive or negative? State Y/N	2. Is the likely Impact? Negative (-1)	2. Is the likely Impact? Neutral (0)	2. Is the likely Impact? Positive (1)	3. Is this a temporary or permanent Impact? State T or P	4. Is this a short term or long term impact? State ST or LT	5. Are there synergies between other <u>policies</u> (or options) which might amplify the effect? State Y or N	6. Commentary/Notes Reflect on how you have considered any short term, long term and cumulative impacts in arriving at that score
									occur in the longer term for the improvements to fully come forward. No negative impacts have been identified.
BX29 – North Bexhill Growth Area - Infrastructure Policy	15	Y			Y	P	LT	Y	This policy focuses on a wide range of infrastructure required to support new development in the area and is therefore mainly linked with the range of proposed allocations coming forward to deliver the relevant improvements. This therefore is more likely to occur in the longer term for the improvements to fully come forward. No negative impacts have been identified.
BX30 – Land south of Haven Brook Avenue – Infrastructure	9	Y			Y	P	LT	Y	This policy focuses on a specific set of infrastructure required to support new development on four proposed allocations in North Bexhill coming forward to deliver the relevant improvements. This therefore is more likely to occur in the longer term for the improvements to fully come forward. No negative impacts have been identified but as this policy is narrower in focus and geographic scope it does not score as highly compared to other policies, such as BX29 which covers the wider North Bexhill area.
GU6 – Rock Lane Urban Fringe Management Area	9	Y			Y	P	LT	Y	This policy primarily seeks to improve the landscape character, biodiversity and access to the countryside which would have long term positive impacts. No negative impacts have been identified. This policy has synergies with others previously consulted on, such as those related to Public Rights of Way and Green & Blue Infrastructure. This policy has also had an influence on the site allocations proposed in the area.
TH3 – Bewl Water	6	Y			Y	P	LT	Y	The policy contains a number of criteria that seeks new development at Bewl Water to conserve and enhance the area. These impacts could be realised in the shorter term and their impacts would last into the long term. No negative impacts have been identified. The policy makes reference to several other policies included those relating to the natural environment and High Weald National Landscape.

Chapter 6 Appendices

Appendix 1 – Regulatory requirements

Appendix 2 - Feedback on the Interim SA Report (2024)

Appendix 3 – SA methodology for proposed site allocations and alternatives

Appendix 4 - SA of Rejected HELAA Sites

Appendix 1 Regulatory requirements

The SEA Regulations set out a legal assessment process that must be followed. In light of this, Figure 33 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 33: SEA Regulations Requirements Checklist (Source: National Planning Practice Guidance)²⁶

Strategic Environmental Assessment Regulations requirements checklist	Where met?
Preparation of environmental report (regulation 12)	Rother Local Plan Sustainability Appraisal
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)).	Scoping Report (January 2021) – the consultation bodies were consulted and responded to the Scoping Report.
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)).	Consideration of reasonable alternatives for policies is included in the Interim SA Report (2024).
When deciding on the scope and level of detail of information to be included in the environmental report the consultation bodies should be consulted.	Further consideration of reasonable alternatives for policies included in this Interim SA Report (2026). This includes the development strategy, site allocations, and development densities – as set out in Chapters 4, 5 and 6.
The information referred to in Schedule 2 is: a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	Rother Local Plan Sustainability Appraisal Scoping Report (January 2021) and updated by the Interim SA Report (2024) (Chapters 2, and Appendix 1). Further updated in this Interim SA Report (2026) – Chapters 1 and 2.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Rother Local Plan Sustainability Appraisal Scoping Report (January

²⁶ National Planning Practice Guidance, Paragraph: 004 Reference ID: 11-004-20150209.

Strategic Environmental Assessment Regulations requirements checklist	Where met?
	<p>2021) and updated by the Interim SA Report (2024) – Chapter 3 and Appendix 2.</p> <p>Further updated by the Interim SA Report (2026) – Chapter 2.</p>
c) The environment characteristics of areas likely to be significantly affected.	<p>Rother Local Plan Sustainability Appraisal Scoping Report (January 2021).</p> <p>Updated by the Interim SA Report (2024) - Chapter 3 and Appendix 2 and Interim SA Report (2026) Chapters 1 and 2.</p>
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).	<p>Rother Local Plan Sustainability Appraisal Scoping Report (January 2021).</p> <p>Updated by the Interim SA Report (2024) - Chapter 2, and Appendix 1.</p>
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.	<p>Rother Local Plan Sustainability Appraisal Scoping Report (January 2021).</p> <p>Updated by the Interim SA Report (2024) - Chapter 3 and Appendix 2.</p> <p>Further updated by the Interim SA Report (2026) – Chapter 2.</p>
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscapes and the interrelationship between the above factors.	<p>As set out in Interim SA Report (2024) - Chapter 5. Appendices 3 and 4.</p>

Strategic Environmental Assessment Regulations requirements checklist	Where met?
These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.	As set out in Interim SA Report (2026) – Chapters 4 and 5.
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.	<p>As set out in Interim SA Report (2024) - Chapter 5. Appendices 3 and 4.</p> <p>As set out in Interim SA Report (2026) – Chapters 4 and 5.</p>
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.	<p>As set out in Interim SA Report (2024) - Chapters 4 and 5, and Appendices 3 and 4.</p> <p>As set out in Interim SA Report (2026) – Chapters 2, 3, 4 and 5, as Appendix (SA site assessment methodology).</p>
i) A description of measures envisaged concerning monitoring in accordance with regulation 17.	<p>Interim SA Report (2024 - Chapter 6.</p> <p>Interim SA Report (2026) – Chapter 3.</p>
j) A non-technical summary of the information provided under the above headings.	Non-Technical Summary to this report.
<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>	Undertaken as part of the Regulation 18 stage public consultation on the draft Rother Local Plan, and in accordance with the Council’s adopted Statement of Community Involvement.
<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: 	These actions are post-adoption procedures which will be carried out, subject to the Local Plan being found sound and formally adopted by the Council.

Strategic Environmental Assessment Regulations requirements checklist	Where met?
<p>(a) how environmental considerations have been integrated into the plan or programme;</p> <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),</p> <p>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>Monitoring framework will be established through the preparation of the Local Plan and associated SA Report.</p> <p>Monitoring will be undertaken following adoption of the plan, and carried out annually through the preparation and publication of the Council's Authority Monitoring Report.</p>

Appendix 2 Feedback on the Interim SA Report (2024)

Respondent	Summary of comments	Rother District Council response
Tunbridge Wells Borough Council	It would be helpful to understand more on the reasons why the sustainable transport corridor aspect of most sustainable development strategy option (SDO3B) was disregarded in its entirety when its less sustainable counterpart (SDO3A) is included as part of the development strategy. Para 5.2.3 states the sustainable transport corridor is not considered deliverable within the plan period. However, if Bexhill is going to be subject to growth through the Local Plan, the sustainable transport corridor could be a longer-term ambition. The SA should clarify whether the development around Bexhill will work towards or set the framework for the sustainable transport corridor coming forward in the future, or at least not hinder its potential. (Tunbridge Wells Borough Council)	The option for the transport corridor was not taken forward as representations to the first Regulation 18 consultation draft Local Plan (2024), including from statutory bodies, raised concerns with the deliverability of this option due to a lack of identified funding and justification for potential works to the Strategic Road Network, and need for further cross-boundary discussions with relevant authorities. This has now been explained in the second Regulation 18 (2026) draft Local Plan.
Marine Management Organisation	It is recommended that the South Inshore and Offshore Marine Plan is included in the Sustainability Appraisal/Strategic Environmental Assessment Scoping Report, for instance, in Section 6. Climate, Flooding and Coastal Change.	The South Inshore and Offshore Marine Plan has now been included in the policy context update, in this Interim Sustainability Appraisal (2026), and used to inform the SA.
Home Builders Federation	The Development Strategy Background Paper sets out 13 spatial development options for the Borough with the Council noting that these have all been individually assessed through the Sustainability Appraisal. What is notable is that not all of these options have indicated estimates as to how much development each would deliver. This makes it difficult to consider how appropriate these are, and of course to effectively appraise each option. With regard housing for example Figure	The reasonable alternatives for the Development Strategy were initially derived as in principle options, which were then subject to SA in the Interim SA

Respondent	Summary of comments	Rother District Council response
	<p>11 of the SA/SEA shows that against the housing objective each option scores a double or single positive. Given that even a combination of each of these options sees housing supply fall well short of meeting housing needs this assessment within the SA/SEA would appear to be fundamentally flawed and cannot be a robust assessment as to the impacts not only with regard to housing but many of the other options. In order to assess the impact of a development option the council must have some idea as to the scale of development that would be expected.</p> <p>From these 13 options the Council have then arrived at the proposed spatial development strategy. However, what is notable is that only one spatial development strategy has been considered from the 13 options. The justification for not considering other reasonable alternatives is that all potential sites have been considered within the SA, including those rejected through the HELAA that these assessments form the consideration of reasonable alternatives.</p> <p>However, HBF would consider such an approach to be inappropriate as it fails to even consider the potential for the Council meeting its housing needs in full through an alternative strategy. Whilst this would require the Council to assesses strategies potentially including some sites that have been rejected within the HELAA, it would have enabled the council to assess the overall harm arising from different spatial strategies and compared to the potential benefits of such strategies against the harm. In essence the Council have rejected potential strategies that may have had more of an impact in landscape terms but had significantly higher social and economic benefits which may have outweighed that harm. In essence the collective benefits of further development may outweigh the harm of these alternative strategies with regard to landscape or other issues, especially where the harm can be mitigated but the potential of such strategies has been ignored. The Council have also failed to assess the potential; impact of not meeting need sin full on neighbouring areas and adding to the cumulative shortfall in East Sussex. The impact of not meeting needs will have wider consequences and these need to be clearly set out within the SA.</p> <p>In only considering sites this wider assessment of different strategies has not been undertaken by the council and as such the SA has failed to properly assess reasonable alternatives with regard the spatial strategy and cannot be relied on by the council to support its plan making process. The Council must consider reasonable alternative strategies that meeting housing needs alongside the</p>	<p>(2024), to inform early-stage work on the draft Local Plan.</p> <p>Subsequent to this, the Council has updated the Housing and Economic Land Availability Assessment (2026), which provides up-to-date evidence of land that is suitable, available and achievable for development within the plan period. Through this process, the Council considers that it has left ‘no stone unturned’ in its efforts to identify land to meet the district’s development needs.</p> <p>The HELAA has informed considerations for the Development Strategy, as this must be realistic and deliverable, and crucially based on land availability (together with other planning policy considerations, such as infrastructure delivery including transport infrastructure; statutory requirements for protecting the National Landscape; and conservation of designated habitats sites, to name a few).</p> <p>The Interim SA (2026) has assessed a range of density options, based on available land and sites for housing and</p>

Respondent	Summary of comments	Rother District Council response
	<p>strategy set out in the draft local plan to consider whether they may offer a more sustainable approach to development in Rother. Sustainability Appraisal of the Proposed Strategy</p> <p>What is notable about the SA of the proposed strategy with regard to housing is the way the question is posed within the assessment framework. The SA objective (8) for housing in the assessment of the strategy policies in the Draft Local Plan asks whether the strategy provides more opportunities for everyone to be in a suitable home to meet their needs. Such the objective has been deliberately written to allow the council to show this as being a positive assessment within the SA with regard to this objective. This is disingenuous and means that the SA has no credibility. In assessing the sustainability of a strategy a policy, the Council should be asking whether it meets the identified need for market and affordable housing in Rother. It is notable that the Council's SA makes no reference, or at least we could find no reference, to housing needs and the shortfall in meeting those needs as a result of the proposed strategy. Alongside this no reference is made to fact that neighbouring authorities are also unable to meet their own housing needs leaving a substantial shortfall against identified needs over the next 15 years of around 27,500 homes. What is evident is that when considered against a more appropriate phrased objective the local plan will have significant negative consequences that need to be properly considered.</p> <p>The scale of the shortfall in market and affordable housing would also impact on other objectives, such as those relating to health and wellbeing, with a higher chance of negative health outcomes due to a lack of affordable and good quality accommodation. The outcome in relation to climate change would also be different with more people living in less energy efficient homes that emit significantly more carbon. The Council may decide that the negative impacts arising from such a significant shortfall in housing are acceptable, but in arriving at that conclusion it must ensure that such issues are front and centre in its decision making and the documents that support it.</p>	<p>other types of development; this has provided the basis for scenario testing of the total amount of development that could be delivered across the district under various density assumptions. This work has been undertaken in the context of the National Planning Policy Framework, and the identified Local Housing Need figure for Rother, as discussed in the SA report and also extensively in the draft Local Plan (2026).</p>
Persimmon Homes	<p>In the context of the above we note that the SA in section 5, in reviewing the Spatial Development Strategy Options, does not appear to look at different scales of growth relative to the LHN (both capped and uncapped) or the implications of only delivering the scale of housing proposed, just a variety of different spatial options where the scale of development is unquantified, despite the fact one of the SA objectives is that 'More opportunities are provided for everyone to be in a suitable</p>	<p>The reasonable alternatives for the Development Strategy were initially derived as in principle options, which were then subject to SA in the Interim SA</p>

Respondent	Summary of comments	Rother District Council response
	<p>home to meet their needs.’ The above belies the evidence base and the various reasons why the council need to meet their LHN / an uplift to the LHN should be considered further, as summarised in the commentary below...</p> <p>The above demonstrates the need for the plan to deliver the LHN in full/ an uplift to the LHN figure to boost the supply of open market and affordable homes and thus help address the affordable housing needs of the District. Said approach would also reflect on spatial objective 4 – to respond to the housing crisis and help facilitate the delivery of housing to meet the needs of different groups in the community, by maximising the potential opportunities for residential development in sustainable and deliverable locations, helping to deliver affordable housing, and ensuring development is viable and supports growth in the district by providing certainty for developers through site allocations and clear planning policies. The SA in reviewing the merits of the alternative spatial options appears to have paid little regard to these fundamental points...</p> <p>To this end, we would stress the need for the SA to not only look at various Spatial Development Strategies, but to express these in the context of overall housing provision and assess not only a strategy that reflects the capped LHN, but both the uncapped LHN and indeed something that falls short of the capped LHN so that the effects of all reasonable alternatives are properly taken into consideration. As currently drafted the SA does not in our opinion adequately addresses the issues raised above or look to address the issue of unmet needs from adjacent authorities – see below...</p> <p>As set out above we note that the SA in scoring the Development Strategy, at Figures 11 and 12 does not actually comment upon the quantum of development the different options would deliver and how this would relate to the LHN, or indeed address the issue of the unmet needs of neighbours. Given SA objective 8 on housing this is somewhat surprising, as is the fact that no one option appears to have been chosen as the preferred option; albeit SDO3B (Bexhill Greenfield Growth Option 2: with New Multi-modal Transport Corridor) appears to score most favourable, followed by SDO6 (Brownfield Intensification and Redevelopment), which as it would totally fail to meet the LHN seems somewhat perverse, especially when figure 11 scores it as ‘Option supports the objective, or elements of the objective on balance, although effects may be minor’. Surely it would be ‘Option appears to conflict with the objective on balance and may result in minor adverse</p>	<p>(2024), to inform early-stage work on the draft Local Plan.</p> <p>Subsequent to this, the Council has updated the Housing and Economic Land Availability Assessment (2026), which provides up-to-date evidence of land that is suitable, available and achievable for development within the plan period. Through this process, the Council considers that it has left ‘no stone unturned’ in its efforts to identify land to meet the district’s development needs.</p> <p>The HELAA has informed considerations for the Development Strategy, as this must be realistic and deliverable, and crucially based on land availability (together with other planning policy considerations, such as infrastructure delivery including transport infrastructure; statutory requirements for protecting the National Landscape; and conservation of designated habitats sites, to name a few).</p> <p>The Interim SA (2026) has assessed a range of density options, based on available land and sites for housing and</p>

Respondent	Summary of comments	Rother District Council response
	<p>effects’ or indeed even ‘Potentially significant adverse effects’. Similarly, the scoring of SDO11 (Growth in settlements with train stations or sustainable transport alternatives) in figure 12 seems somewhat odd21 given its based on sustainable transport. To this end we also note that in a number of occasions, SOD4 and SOD5 for instance, growth is said to be resisted by virtue of land availability based on environmental and topographical constraints. Given the scale of unmet need currently proposed we would respectively suggest the council need to do more to establish whether additional land in these areas is available/ could be developed as no stone should be left unturned in trying to meet the LHN. As it stands, the SA lacks the necessary robustness required as it is impossible to assess the impact and weigh benefits and harm of each development strategy without know scale of delivery associated with each option...</p> <p>Having regard to the above we feel it’s imperative that if the SA is to be effective the next iteration needs to assess the Development Strategy in the context of the LHN and how the council are to accommodate this/ the implications of not accommodating it/ over delivering to address adjacent authorities’ unmet needs. (Persimmon Homes)</p>	<p>other types of development; this has provided the basis for scenario testing of the total amount of development that could be delivered across the district under various density assumptions. This work has been undertaken in the context of the National Planning Policy Framework, and the identified Local Housing Need figure for Rother, as discussed in the SA report and also extensively in the draft Local Plan (2026).</p>
East Sussex County Council	<p>Public Health welcomes the integration of a set of Health Impact Assessment criteria and the emphasis this has given to the consideration of health and wellbeing within the Plan. The HIA criteria provides a systematic process to work through the health and wellbeing considerations and impacts of the local plan on the population. Public Health generally supports the conclusions of the appraisal which reflects the strong collaboration with us and the strength of policies to support the overarching health and wellbeing objective for the Local Plan.</p>	<p>Noted.</p>
Planning agent	<p>The April 2024 Sustainability Appraisal provides no basis on which to reject TIC0039.</p>	<p>The SA is one of multiple considerations used to inform the selection of proposed site allocation policies for the Local Plan.</p>

Appendix 3 SA methodology for proposed site allocations and alternatives

Criteria	Significant positive	Minor positive	Neutral or uncertain	Minor negative	Significant negative	Data sources	Notes
Scoring key	++	+	0	-	--		
SA1: Reduce air pollution from transport and development and improve air quality							
1a. Settlement sustainability	Site located in 'highly sustainable' location (Blue)	Site located in 'sustainable' or 'moderately' sustainable location (Dark and light green)	Site located in 'potentially sustainable' location (Yellow)	Site located in 'low sustainable' location (Orange)	Site located in 'not sustainable' location (Red)	Rother Settlement Study (Regulation 18 Version – April 2024), Figure 12	If site is not in a settlement used in the study, marked as '0' (neutral / uncertain)
1b. Air Quality Management Area	N/A	N/A	N/A	N/A	N/A	Rother Annual Air Quality Status Report (2024)	There are no AQMAs in Rother, so not currently appraised – to keep under review.
SA2: Biodiversity is protected, conserved and enhanced							
2a. Site of Special Scientific Interest (SSSI) Impact Risk Zone	N/A	N/A	Site not located within an IRZ	Site located in an IRZ (relevant use, i.e. residential or commercial, depending on	Site located in a SSSI	GIS Natural England, Impact Risk Zones mapping	This tool is used for LPAs to understand when to consult Natural England on

Criteria	Significant positive	Minor positive	Neutral or uncertain	Minor negative	Significant negative	Data sources	Notes
Scoring key	++	+	0	-	--		
				proposed use for site)			planning applications.
2b. Ancient woodland	N/A	N/A	Site is not adjacent to (over 50 metres from) ancient woodland	Site is adjacent to (within 50 metres of) ancient woodland	Site contains ancient woodland	GIS Natural England/Defra Ancient Woodland mapping	
2c. Tree Protection Order	N/A	N/A	Site does not contain a TPO	Site contains a TPO	N/A	GIS	
2d. Priority Habitats	N/A	N/A	Site is not adjacent to AND does not contain priority habitat	Site is adjacent to priority habitat	Site contains priority habitat	GIS Natural England, England Priority Habitats mapping	Officer discretion used to determine whether a site is (or is not) 'adjacent to' priority habitat.
SA3: The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation)							
3a. Decentralised energy	N/A	Site located within a potential heat network cluster	Site not located within a potential heat network cluster	N/A	N/A	GIS Rother Climate Change Study – Net Zero Carbon	

Criteria	Significant positive	Minor positive	Neutral or uncertain	Minor negative	Significant negative	Data sources	Notes
Scoring key	++	+	0	-	--		
						Evidence Base Report. See Figures: 24, 25, 26, 27	
3b. Settlement sustainability (as per SA1 above)	Site located in 'highly sustainable' location	Site located in 'sustainable' or 'moderately' sustainable location	Site located in 'potentially sustainable' location	Site located in 'low sustainable' location	Site located in 'not sustainable' location	Rother Settlement Study (Regulation 18 Version – April 2024), Figure 12	
SA4: Minimise water consumption							
This SA objective is screened out of the site assessment. Water consumption / water efficiency standards are dealt with through Development Management policies and Building Regulations.							
SA5: Manage and reduce the risk of flooding (fluvial, tidal and surface water), now and in the future, and increase resilience to the wider effects of climate change.							
5.a EA Flood Risk Map	N/A	N/A	Flood Zone 1	Flood Zone 2	Flood Zone 3	GIS Environment Agency Flood Map for Planning mapping and Rother SFRA	

Criteria	Significant positive	Minor positive	Neutral or uncertain	Minor negative	Significant negative	Data sources	Notes
Scoring key	++	+	0	-	--		
5.b Surface water flood risk	N/A	Contains land with no risk.	Contains land with low risk (0.1%-1% AEP)	Contains land with medium risk (1.1%-3.3% AEP)	Contains land with high risk (>3.3% AEP)	GIS Environment Agency Flood Map for Planning mapping and Rother SFRA	The assessment included an allowance for the impact of climate change. (Environment Agency data, March 2025)
5.c Groundwater flood risk	N/A	Groundwater levels are more than 5 m below the ground surface.	Groundwater levels are between 0.5m and 5m below the ground surface.	Groundwater levels are between 0.025m and 0.5m below the ground surface.	Water levels are either at or very near (within 0.025m of) the ground surface	GIS Environment Agency Flood Map for Planning mapping and Rother SFRA	
SA6: The risk of coastal erosion is managed and reduced, now and in the future.							
6.a Coastal Change Management Area	N/A	N/A	Site is not within a CCMA	Site located within CCMA but for appropriate	Site located CCMA but for inappropriate	PPG on appropriate uses	The CCMA will be defined through the plan process.

Criteria	Significant positive	Minor positive	Neutral or uncertain	Minor negative	Significant negative	Data sources	Notes
Scoring key	++	+	0	-	--		
				uses, as defined by NPPF/G	uses, as defined by NPPF/G	Draft Rother Local Plan (April 2024), Policy ENV4 and Figure 43.	For this exercise, the CCMA is per the draft Rother Local Plan (2024).
SA7: The health and well-being of the population is improved and inequalities in health are reduced							
7.a Access to essential services	Site in settlement with very good access to essential services (Score 5)	Site in settlement with good access to essential services (Score 4)	Site in settlement with moderate access to essential services (Score 3)	Site in settlement with limited access to essential services (Score 2)	Site in settlement with very limited or no access to essential services (Score 1 or Score 0)	Rother Settlement Study (Regulation 18 Version – April 2024), Essential Services Scoring, Figure 3 and 12	This criterion extracts the ‘essential services’ assessment from the Settlement Study
7.b Access to public open space	N/A	Site within 400m of a public open space of any type	N/A	Site not within 400m of a public open space of any type	N/A	GIS Open Space Sport and Recreation Study, 2007	Measured “as the crow flies”. Open space publicly and freely accessible (e.g. excludes school playing

Criteria	Significant positive	Minor positive	Neutral or uncertain	Minor negative	Significant negative	Data sources	Notes
Scoring key	++	+	0	-	--		
							fields, private golf courses, etc.).
7.c Access to Public Right of Way	N/A	Site within 400m of a PRoW	N/A	Site not within 400m of a PRoW	N/A	GIS	Measured “as the crow flies”.
SA8: More opportunities are provided for everyone to in a suitable home to meet their needs							
This SA objective is screened out of the site assessment. It is assumed that housing site allocations will boost housing supply and improve access to housing and therefore have positive effects.							
SA9: All sectors of the community have improved accessibility to services, facilities, jobs, and social and cultural opportunities							
9.a Settlement sustainability (as per SA1 above)	Site located in ‘highly sustainable’ location	Site located in ‘sustainable’ or ‘moderately’ sustainable location	Site located in ‘potentially sustainable’ location	Site located in ‘low sustainable’ location	Site located in ‘not sustainable’ location	Rother Settlement Study (Regulation 18 Version – April 2024), Figure 12	
SA10: Safe and secure environments are created and there is a reduction in crime and fear of crime.							
This SA objective is screened out of the site assessment. Design standards and guidelines for safe and secure environments are dealt with through Development Management policies and Building Regulations.							
SA11: Historic environment/ townscape is protected, enhanced and made more accessible							

Criteria	Significant positive	Minor positive	Neutral or uncertain	Minor negative	Significant negative	Data sources	Notes
Scoring key	++	+	0	-	--		
11.a Heritage assets	N/A	N/A	Designated heritage asset(s) neither within nor adjacent to the site	Designated heritage asset(s) adjacent to the site	Designated heritage asset(s) within the site	GIS	This includes: Conservation Areas, Listed buildings, scheduled monuments, registered parks/gardens, battlefield and protected wreck sites.
11.b Area of archaeological potential	N/A	N/A	Site outside archaeological notification area	Site within archaeological notification area	N/A	GIS	
SA12: The risk of pollution to land and soils is reduced and quality is improved							
12.a Agricultural land classification	N/A	Very Poor (Grade 5) quality	Poor (Grade 4) quality	Good (Grade 3a) or Moderate (Grade 3b) quality	Excellent (Grade 1) or Very Good (Grade 2) quality	GIS Natural England, Provisional Agricultural Land	N/A scored if classification does not apply (e.g. urban)

Criteria	Significant positive	Minor positive	Neutral or uncertain	Minor negative	Significant negative	Data sources	Notes
Scoring key	++	+	0	-	--		
						Classification mapping	
SA13: Through waste reuse, recycling and minimisation, the amount of waste for disposal is reduced							
This SA objective is screened out of the site assessment. Design standards and guidelines for waste management are dealt with through Development Management policies and Building Regulations.							
SA14: The risk of pollution to water is reduced and water quality is improved							
14.a Source Protection Zone	N/A	N/A	Site does not contain land within a SPZ.	Site contains land within SPZ2 or SPZ3	Site contains land contains land within SPZ1	GIS Government Magic Maps	
SA15: Ensure that Parks, gardens and countryside are protected, enhanced and made more accessible							
15.a National Landscape – relative location	N/A	N/A	Site is located outside the National Landscape and its setting	Site is located adjacent to or in the setting of the National Landscape	Site is located within National Landscape	GIS	Officer discretion used to determine whether a site is within the

Criteria	Significant positive	Minor positive	Neutral or uncertain	Minor negative	Significant negative	Data sources	Notes
Scoring key	++	+	0	-	--		
							setting of the HWNL.
15.b National Landscape - sensitivity (applies only to sites in the National Landscape)	N/A	No impact	Low impact	Medium impact	High impact	<p>High Weald AONB (National Landscape) Management Plan.</p> <p>HELAA Landscape Sensitivity Assessment (if available) or officer assessment, informed by HWNL management plan, Market Towns and Villages Landscape Assessment (2009), Bexhill and Hastings</p>	

Criteria	Significant positive	Minor positive	Neutral or uncertain	Minor negative	Significant negative	Data sources	Notes
Scoring key	++	+	0	-	--		
						Fringes Landscape Assessment (2008) and any other relevant assessments.	
15.c Landscape sensitivity (applies only to sites outside the National Landscape)	N/A	No impact	Low impact	Medium impact	High impact	HELAA Landscape Sensitivity Assessment (if available), or officer assessment, informed by Market Towns and Villages Landscape Assessment (2009), Bexhill and Hastings Fringes Landscape Assessment (2008) and any other relevant assessments.	Landscape sensitivity derived through officer assessment.

Criteria	Significant positive	Minor positive	Neutral or uncertain	Minor negative	Significant negative	Data sources	Notes
Scoring key	++	+	0	-	--		
15.d Type of land	Site is fully brownfield land	Site is predominantly brownfield land	Site is a mix of greenfield and brownfield land	Site is predominantly greenfield land	Site is fully greenfield land	Site survey / HELAA information	Using the NPPF definition of previously developed land/brownfield meaning agricultural buildings are greenfield.
SA16: Economic performance is improved							
This SA objective is screened out of the site assessment. Indicators for economic performance makes it difficult to differentiate between site assessments.							
SA17: There are high and stable levels of employment and diverse employment opportunities for all							
17.a Existing Employment or commercial uses	N/A	N/A	The site does not contain an existing employment or commercial use	Part of the site is occupied by an existing employment or commercial use, together with another use (i.e. mixed use)	Site is wholly occupied by an existing employment or commercial use	Site survey / HELAA	Negative scoring for loss of employment or commercial uses.

Criteria	Significant positive	Minor positive	Neutral or uncertain	Minor negative	Significant negative	Data sources	Notes
Scoring key	++	+	0	-	--		
17.b New or replacement employment or commercial uses only <i>(N/A if site does not propose new or replacement employment or commercial use).</i>	N/A	The site does not contain an existing employment or commercial use and will include a new such use by the site allocation	The site contains an existing employment or commercial use that will be replaced by such a use by the site allocation	N/A	N/A	Site survey / HELAA	Neutral and positive scoring for replacement or new employment use
SA18: Levels of poverty and social exclusion are reduced, and the deprivation gap is closed in the more deprived areas							
This SA objective is screened out of the site assessment. Indicators for poverty and social exclusion make it difficult to differentiate between site assessments.							
SA19: Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve.							
This SA objective is screened out of the site assessment. Indicators for skills and education make it difficult to differentiate between site assessments.							
SA20: Road congestion levels are reduced and there is less car dependency and greater travel choice							
20.a Public transport access	Site within a settlement with access to multiple train stations and	Site within a settlement with access to a train station and good bus service OR	Site within a settlement with access to an	Site within a settlement with access to an	Site within a settlement with access to only	Rother Settlement Study (Regulation 18 Version – April 2024), Public	

Criteria	Significant positive	Minor positive	Neutral or uncertain	Minor negative	Significant negative	Data sources	Notes
Scoring key	++	+	0	-	--		
	good bus services (Score 5)	with access to either a train station or good bus service (Score 4 and Score 3)	average bus service (Score 2)	infrequent bus service (Score 1)	limited or no bus services (Score 0)	Transport Scoring, Figure 8 and 12	
20.b Public transport access - Bexhill Parish	Site within 800m of Bexhill train station (or N/A if not in Bexhill Parish)	Site within 800m of a Collington, Cooden Beach, or Norman's Bay train stations (or N/A if not in Bexhill Parish)	Site is not within 800m of a train station (or N/A if not in Bexhill Parish)	N/A	N/A	GIS	Distance measured "as the crow flies". Criterion applies only to Bexhill Parish sites.

Appendix 4 SA of the Rejected HELAA Sites

Significant positive	Minor positive	Neutral or uncertain	Minor negative	Significant negative
++	+	0	-	--

Bexhill sub-area – residential

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
Bexhill																												
Central Urban Area																												
No rejected sites in this area.																												
Suburban Area																												
BEX0097 – Land east of Filsham Drive		++	-	-	0	-	0	++	0	+	-	0	++	+	+	++	-	0	-	0	0	N/A	-	--	0	N/A	++	0
BEX0110 – Land adjoining Pebsham Rural Business Park, Pebsham Lane		++	-	0	0	0	0	++	0	--	-	0	++	+	+	++	0	0	-	0	0	N/A	-	--	0	N/A	++	0
BEX0111 – Land between 18 – 20 Collington Park Crescent		++	0	0	0	0	0	++	0	--	+	0	++	+	+	++	0	0	N/A	0	0	N/A	0	--	0	N/A	++	+
BEX0049 – Land at Highwoods Avenue		+	-	0	-	0	0	+	0	0	+	0	+	+	+	+	0	0	0	0	0	N/A	-	0	0	N/A	+	0
BEX0075 – Woodsgate Place, Gunters Lane		++	0	0	-	0	0	++	0	+	+	0	++	+	+	++	0	0	N/A	0	0	N/A	-	+	0	N/A	++	0
BEX0133 – Land adjacent to Holly Close		+	-	-	0	--	0	+	0	0	+	0	+	+	+	+	0	0	0	0	0	N/A	-	--	0	N/A	+	0
West Bexhill Area																												
BEX0050 – Land south of Barnhorn Road (south-west)		+	-	0	0	--	0	+	--	--	+	0	+	-	+	+	-	0	-	0	0	N/A	-	--	0	N/A	+	0

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
BEX0109 – Land at Coast Road, Normans Bay		-	-	0	0	--	0	-	--	-	+	0	--	+	+	-	0	0	0	0	0	N/A	--	--	0	N/A	+	+
BEX0123 – Land at The Cedars, Sandhurst Lane		+	-	0	-	0	0	+	0	+	+	0	+	+	+	+	-	0	--	0	0	N/A	-	0	0	N/A	+	0
BEX0124 – Land at The Piggeries, The Bungalow, Sandhurst Lane	-	+	-	0	0	--	0	+	--	+	+	0	+	+	+	+	0	0	0	0	0	N/A	0	0	-	N/A	+	0
BEX0128 – Picknill Green Farm Buildings, Sandhurst Lane		+	-	0	0	--	0	+	--	-	+	0	+	+	+	+	0	0	0	0	0	N/A	0	--	0	N/A	+	0
BEX0206 – Land at Gotham Farm (west), Sandhurst Lane		+	-	0	0	0	0	+	--	--	+	0	+	+	+	+	0	0	0	0	0	N/A	--	--	0	N/A	+	0
BEX0207 – Kloofs Caravan Park, Sandhurst Lane		+	-	-	0	-	0	+	--	--	+	0	+	+	+	+	0	0	0	0	0	N/A	--	0	--	N/A	+	0
BEX0213 – Land south of Barnhorn Road (west)		+	-	0	0	-	0	+	0	-	+	0	+	+	+	+	-	0	-	0	0	N/A	--	--	0	N/A	+	0
North Bexhill Area																												
BEX0211 – Land at Chestnut Meadow Caravan Park, Ninfield Road		-	-	-	0	--	0	-	0	--	+	0	--	+	+	-	0	0	0	0	0	N/A	-	0	-	N/A	+	0
BEX0228 – Land north of Bexhill Enterprise Park, Haven Brook Avenue		+	-	--	0	--	0	+	0	--	+	0	+	+	+	+	0	0	-	0	0	N/A	--	--	0	N/A	+	0
BEX0183 – Land at Pebsham Farm (south)		++	-	0	0	--	0	++	--	--	+	0	++	+	+	++	0	0	-	0	0	N/A	--	--	0	N/A	++	0
BEX0184 – Land at Pebsham Farm (central)		++	-	0	0	0	0	++	--	+	+	0	++	+	+	++	0	0	-	0	0	N/A	--	--	0	N/A	++	0

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
BEX0185 – Land at Pebsham Farm (north)		++	--	0	0	--	0	++	--	--	+	0	++	+	+	++	0	0	0	0	0	N/A	--	--	0	N/A	++	0
BEX0204 – Land at Scallets Wood House, St Mary’s Lane		+	-	0	0	--	0	+	0	--	+	0	+	+	+	+	0	0	0	0	0	N/A	-	-	0	N/A	+	0
BEX0162 – Land at Lunsfords Cross, Ninfield Road (north side)		-	-	0	0	0	0	-	0	+	+	0	--	+	+	-	0	0	-	0	0	N/A	-	--	0	N/A	+	0

Bexhill sub-area – economic

SA Objective	Indicative floorspace	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
Bexhill																												
BEX0186 – Land north-west of Bexhill Road, Pebsham		++	-	0	0	0	0	++	0	--	+	0	++	+	+	++	0	0	-	0	0	N/A	-	+	--	0	++	0
BEX0228 – Land north of Bexhill Enterprise Park, Haven Brook Avenue		+	-	--	0	--	0	+	0	--	+	0	+	+	+	+	0	0	-	0	0	N/A	--	--	0	+	+	0

Southern Rother and Hastings Fringes sub-area

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing				SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b	
Southern Rother and the Hastings Fringes																													
Crowhurst																													
HAF0011 - Land at Upper Wilting Farm (south)		0	--	--	0	--	0	0	--	--	+	0	0	-	+	0	-	0	-	0	0	N/A	--	--	0	N/A	0	N/A	
HAF0022 - Land at Upper Wilting Farm (north)		0	-	--	0	--	0	0	--	--	+	0	0	-	+	0	0	0	-	0	0	N/A	-	--	0	N/A	0	N/A	
Fairlight																													
FAI0015 - Land north of Battery Hill		0	-	0	0	0	0	0	0	+	+	0	0	+	+	0	-	0	0	0	0	--	--	N/A	--	0	N/A	+	N/A
FAI0016 - Guestling Telephone Exchange, Pett Road, Friars Hill		-	-	-	0	0	0	-	0	+	+	0	--	+	+	-	0	0	0	0	0	--	-	N/A	+	0	N/A	0	N/A
Guestling																													
HAF0014 - Land adjacent to Millward Gardens, Batchelors Bump		-	-	0	0	0	0	-	0	+	-	0	--	-	+	-	0	0	0	0	0	--	-	N/A	--	0	N/A	+	N/A
HAF0017 - Land at Beechwood, Chowns Hill		0	0	--	0	--	0	0	0	--	+	0	-	-	+	0	0	0	0	0	0	--	-	N/A	0	0	N/A	+	N/A
HAF0033 - Land at Oak Side Farm, Rock Lane		+	0	--	0	--	0	+	0	--	+	0	+	-	+	+	0	0	-	0	0	--	-	N/A	-	0	N/A	+	N/A
GUE0021 - Land South of Guestling Hall, Bachelor's Bump		-	-	0	0	-	0	-	0	+	+	0	--	-	+	-	-	0	0	0	0	--	-	N/A	--	0	N/A	+	N/A
GUE0025 - White Hart Hill, Guestling		-	-	-	0	-	0	-	0	0	+	0	--	-	+	-	0	0	-	0	0	--	-	N/A	--	0	N/A	+	N/A
GUE0026 - Land behind the White Hart Beefeater, Winchelsea Road		-	-	--	0	--	0	-	0	--	-	0	--	-	+	-	-	0	0	0	0	--	--	N/A	--	0	N/A	+	N/A

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
GUE0008 - Land adjacent to Three Oaks Village Hall, Butchers Lane		-	0	0	0	--	0	-	0	0	+	0	--	+	+	-	-	0	0	0	--	-	N/A	--	0	N/A	+	N/A
GUE0016 - Land to the east of Maxfield Lane		-	0	-	0	0	0	-	0	+	-	0	--	+	+	-	0	0	-	0	--	--	N/A	--	0	N/A	+	N/A
GUE0020 - Land west of Fourteen Acre Lane		-	0	0	0	0	0	-	0	--	-	0	--	+	+	-	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A
GUE0027 - Field at Halfhouse, Butchers Lane		-	0	-	0	-	0	-	0	-	+	0	--	+	+	-	0	0	-	0	--	--	N/A	--	0	N/A	+	N/A
Icklesham																												
ICK0002 - Seven Acres, Watermill Lane		0	-	-	0	-	0	0	0	--	0	0	-	+	+	0	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A
Pett																												
PET0011 - Land at Gatehurst Farm, Pett Road		-	-	0	0	0	0	-	0	+	0	0	-	+	+	-	0	0	-	0	--	--	N/A	--	0	N/A	0	N/A
PET0012 - Land adjacent to Little Fraysland, Pett Road		-	-	0	0	0	0	-	0	+	-	0	-	+	+	-	-	-	-	0	--	--	N/A	--	0	N/A	0	N/A
PET0013 - Land adjacent to Little Buds, Pett Road		-	-	0	0	0	0	-	0	+	+	0	-	-	+	-	-	0	-	0	--	-	N/A	--	0	N/A	0	N/A
PET0014 - Land west of Lunsford Farm, Pett Road		-	-	0	0	--	0	-	0	0	0	0	-	+	+	-	0	0	-	0	--	--	N/A	--	0	N/A	0	N/A
PET0015 - Lower Chick Hill Field, Chick Hill		-	-	0	0	0	0	-	0	+	0	0	--	+	+	-	-	0	-	0	--	-	N/A	--	0	N/A	+	N/A
PET0017 - Land rear of High Elms Farm, Pett Road		-	-	0	0	-	0	-	0	--	+	0	-	+	+	-	0	0	-	0	--	-	N/A	-	0	N/A	0	N/A
PET0020 - Fairlight Wood Camp Site, Watermill Lane		-	-	--	0	--	0	-	0	--	+	0	-	+	+	-	0	0	-	0	--	--	N/A	-	0	N/A	0	N/A
Westfield																												

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
HAF0013 - Land rear of 70 Westfield Lane		0	-	--	0	--	0	0	0	--	+	0	-	+	+	0	0	0	0	0	-	N/A	-	--	0	N/A	+	N/A
HAF0032 - Land at 56 Westfield Lane		0	-	--	0	--	0	0	0	--	+	0	-	+	+	0	0	0	0	0	-	N/A	-	--	0	N/A	+	N/A
WES0001 - Land west of Cottage Lane		+	0	0	-	--	0	+	0	--	+	0	+	+	+	+	0	-	-	0	--	--	N/A	--	0	N/A	0	N/A
WES0022 - Field at Thornyridge, Westbrook Lane		+	0	-	0	-	0	+	0	0	+	0	+	-	+	+	0	0	-	0	--	--	N/A	--	0	N/A	0	N/A
WES0023 - Land at Tanyard Farmhouse, Fishponds Lane		+	0	0	-	--	0	+	0	--	+	0	+	+	+	+	0	-	-	0	--	-	N/A	-	0	N/A	0	N/A
WES0024 - Land north of Fishponds Lane and east of Workhouse Lane		+	0	0	0	--	0	+	0	--	+	0	+	+	+	+	0	-	-	0	--	-	N/A	--	0	N/A	0	N/A
WES0031 - Land east of Stonestile Lane		+	0	0	0	0	0	+	0	0	+	0	+	+	+	+	-	-	-	0	--	0	N/A	--	0	N/A	0	N/A
WES0043 - Troyd Farm, Moat Lane		0	0	-	0	0	0	0	0	--	+	0	0	+	+	0	0	0	0	0	--	-	N/A	-	0	N/A	0	N/A
WES0044 - Land at Thala Farm, Mill Lane		+	0	0	0	0	0	+	0	--	+	0	+	+	+	+	0	0	-	0	--	-	N/A	--	0	N/A	0	N/A
WES0045 - Moor Farm, Westfield Lane		0	0	0	0	0	0	0	0	--	+	0	0	+	+	0	0	0	-	0	--	--	N/A	--	0	N/A	0	N/A
WES0047 - Thornyridge, Westbrook Lane		+	0	0	0	-	0	+	0	+	+	0	+	-	+	+	0	0	-	0	--	-	N/A	--	0	N/A	0	N/A
WES0048 - Land at Westbrook Lane		+	0	0	0	0	0	+	0	+	+	0	+	+	+	+	0	-	-	0	--	-	N/A	--	0	N/A	0	N/A
WES0049 - Land on east side of Cottage Lane		+	0	0	0	0	0	+	0	0	+	0	+	+	+	+	0	-	-	0	--	0	N/A	--	0	N/A	0	N/A
WES0050 - Moor Farm - South		+	0	0	0	0	0	+	0	0	+	0	+	+	+	+	0	-	-	0	--	-	N/A	--	0	N/A	0	N/A
WES0051 - Land at Freshfields Farm, Westfield Lane		0	0	--	0	--	0	0	0	--	-	0	0	+	+	0	0	0	-	0	--	--	N/A	-	-	N/A	0	N/A

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
Southern Rother and the Hastings Fringes																												
Guestling																												
HAF0018 - Land north of employment allocation, A265, Ivyhouse Lane		+	-	-	0	--	0	+	0	--	+	0	+	0	+	+	0	0	-	0	--	-	N/A	--	0	+	+	N/A

Battle and Surrounding Settlements sub-area – residential

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
Battle and surrounding settlements																												
Ashburnham																												
ASH0005 – Street Farm, Brownbread street		--	0	-	0	-	0	--	0	-	0	0	--	-	+	--	-	0	-	0	--	--	N/A	--	0	N/A	--	N/A
Brightling																												
BRI0012 – Land at Wyland Wood, Willards Hill		--	0	--	0	--	0	--	0	--	0	0	--	-	+	--	0	0	0	0	--	--	N/A	--	0	N/A	--	N/A
Battle																												
BAT0009 – Hughes Field, Caldbec Hill		+	0	0	-	--	0	+	0	0	0	0	+	+	-	+	0	-	0	0	--	--	N/A	--	0	N/A	+	N/A
BAT0013 – Land adjacent to Fredrick Thatcher Place, North Trade Road		+	0	-	0	-	0	+	0	--	+	0	+	+	-	+	-	0	0	0	--	-	N/A	--	0	N/A	+	N/A
BAT0046 – Telham Field, Land south of Hastings Road		--	-	0	0	0	0	--	0	--	+	0	--	+	+	--	0	0	0	0	--	--	N/A	--	0	N/A	--	N/A
BAT0048 – Caldbec House South Field, Caldbec Hill		+	0	0	0	0	0	+	0	0	+	0	+	+	+	+	-	-	-	0	--	--	N/A	--	0	N/A	+	N/A
BAT0072 – Rosecourt, London Road		+	0	0	0	-	0	+	0	--	+	0	+	+	+	+	-	0	0	0	--	--	N/A	-	0	N/A	+	N/A
BAT0073 – Land south of Virgins Lane		+	0	0	-	0	0	+	0	+	+	0	+	+	+	+	0	-	0	0	--	--	N/A	-	0	N/A	+	N/A
BAT0074 – Black Firs Farm, London Road		+	0	-	0	--	0	+	0	--	+	0	+	+	+	+	0	0	0	0	--	--	N/A	-	0	N/A	+	N/A
BAT0075 – Land adjacent to Whitelands, North Trade Road		+	0	--	0	--	0	+	0	+	+	0	+	-	+	+	+	0	0	0	--	--	N/A	--	0	N/A	+	N/A
BAT0076 – Land to the East of Battle		+	0	--	-	--	0	+	0	--	+	0	+	+	+	+	--	-	-	0	--	--	N/A	-	0	N/A	+	N/A

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
BAT0077 – Land to the rear of Mount Street Car Park		+	0	0	0	-	0	+	0	--	+	0	+	+	+	+	-	-	-	0	--	--	N/A	-	0	N/A	+	N/A
BAT0079 – Land east of Cherry Tree Allotments, Mount Street		+	0	0	0	-	0	+	0	--	+	0	+	+	+	+	0	-	-	0	--	--	N/A	--	0	N/A	+	N/A
BAT0080 – Land at Loose Farm, Hastings Road		+	0	0	0	--	0	+	0	--	+	0	+	+	+	+	-	0	-	0	--	--	N/A	--	0	N/A	+	N/A
BAT0081 – Land at Marley Farm		--	0	0	0	0	0	--	0	--	+	0	--	+	+	--	0	0	-	0	--	--	N/A	0	0	N/A	--	N/A
BAT0082 – Land north of Wastewater Treatment Works		--	0	0	0	-	0	--	0	--	+	0	--	+	+	--	0	0	-	0	--	--	N/A	--	0	N/A	--	N/A
BAT0114 – Land west of North Lodge, North Trade Road		+	0	--	0	--	0	+	0	0	+	0	+	+	+	+	0	0	0	0	--	-	N/A	--	0	N/A	+	N/A
BAT0119 – Land at Crowhurst Park, Telham Lane		+	0	0	0	--	0	+	0	+	+	0	+	+	+	+	0	0	0	0	--	--	N/A	--	0	N/A	+	N/A
BAT0120 – Land at Uckham Lane		+	0	0	0	0	0	+	0	-	+	0	+	+	+	+	0	-	0	0	--	--	N/A	--	0	N/A	+	N/A
BAT0122 – Rutherfords Business Park, Marley Lane		--	0	--	0	--	--	+	0	--	+	0	--	-	+	--	0	0	-	0	--	--	N/A	0	-	0	--	N/A
BAT0125 – Crowhurst Park, Land south of Hastings Road		+	0	0	0	-	0	+	0	--	+	0	+	+	+	+	-	0	0	0	--	--	N/A	--	0	N/A	+	N/A
Catsfield																												
CAT0012 – Land off Church Lane		-	0	0	0	0	0	-	0	+	+	0	0	+	+	-	-	0	-	0	--	--	N/A	--	0	N/A	0	N/A
CAT0013 – Great Park Farm, Horns Corner		--	0	0	0	--	0	--	0	0	+	0	--	-	+	--	-	0	0	0	--	0	N/A	0	0	N/A	--	N/A
CAT0014 – The Brooks, Church Road		-	0	-	0	-	0	-	0	--	+	0	0	+	+	-	-	0	-	0	-	N/A	-	--	0	N/A	0	N/A
CAT0017 – Land north-west of Catsfield		-	0	0	-	-	0	-	0	0	+	0	0	+	+	-	0	0	-	0	--	--	N/A	--	0	N/A	0	N/A
CAT0018 – Land west of Catsfield Road		-	0	0	-	-	0	-	0	--	+	0	0	+	+	-	0	0	-	0	--	--	N/A	--	0	N/A	0	N/A

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
CAT0019 – Land north of Captain’s Wood, Normanhurst Estate		--	0	-	--	-	0	--	0	--	+	0	--	-	+	--	0	0	+	0	--	--	N/A	--	0	N/A	--	N/A
CAT0020 – Land rear of Spring Cottage, Church Lane		-	0	0	0	0	0	-	0	+	+	0	0	+	+	-	0	0	-	0	--	--	N/A	--	0	N/A	0	N/A
CAT0021 – Great Park Farm, Church Lane		--	0	0	0	0	0	--	0	+	+	0	0	+	+	--	-	0	-	0	--	-	N/A	--	-	0	--	N/A
CAT0026 – Land to the east of the Warren, North Trade Road		-	0	-	0	-	0	-	0	0	+	0	0	-	-	-	0	0	+	0	--	--	N/A	--	0	N/A	0	N/A
CAT0027 – Land at Pepperling Eye, Battle		--	0	--	0	--	0	--	0	--	+	0	--	-	+	--	0	0	-	-	--	--	N/A	--	0	N/A	--	N/A
CAT0028 – Normanhurst Court Caravan & Motorhome Club, Freckley Hollow		--	-	-	-	--	0	--	0	--	+	0	--	-	+	--	-	0	+	0	--	-	N/A	--	-	0	--	N/A
CAT0030 – Land North of Parkgate Cottages, Horns Corner		-	0	0	0	--	0	-	0	0	+	0	0	-	+	-	0	0	0	0	--	--	N/A	--	0	N/A	0	N/A
CAT0031 – Land North of Ivy House, The Green		-	0	0	0	--	0	-	0	0	+	0	0	+	+	-	0	0	-	0	--	-	N/A	--	0	N/A	0	N/A
Dallington																												
DAL0002 – Land at Pantons, The Street		-	-	0	0	0	0	-	0	0	+	0	0	+	+	-	-	-	-	0	--	--	N/A	-	0	N/A	--	N/A
Mountfield																												
MOU005 – Land west of Hoath Hill		-	0	0	0	0	0	-	--	--	+	0	--	+	+	-	-	0	-	0	--	--	N/A	-	0	N/A	0	N/A
Netherfield																												
BAT0216 – Netherfield Place Farm West, Netherfield Road		-	-	0	0	0	0	-	0	+	+	0	0	+	+	-	-	0	-	0	--	--	N/A	--	0	N/A	--	N/A
BAT0217 - Netherfield Place Farm South, Netherfield Road		--	-	-	0	-	0	--	0	--	+	0	--	-	+	--	0	0	-	0	--	--	N/A	--	0	N/A	--	N/A

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
BAT0218 - Netherfield Place Farm North, Netherfield Road		-	-	0	0	-	0	-	0	--	+	0	0	+	+	-	0	0	-	0	--	--	N/A	--	0	N/A	--	N/A
BAT0219 - Netherfield Place Farm East, Netherfield Road		--	0	-	0	-	0	--	0	--	+	0	--	+	+	--	-	-	-	0	--	--	N/A	--	0	N/A	--	N/A
BAT0220 - Netherfield Place Farm Central, Netherfield Road		-	-	--	0	--	0	-	0	--	+	0	0	+	+	-	-	-	-	0	--	--	N/A	--	0	N/A	--	N/A
Sedlescombe																												
SED0035 – Land at Compasses Lane, Cripps Corner		--	0	0	0	0	0	--	0	+	+	0	--	-	+	--	0	-	0	0	--	-	N/A	--	0	N/A	--	N/A
SED0041 – Gotways, Kent Street		--	0	0	0	0	0	--	0	--	+	0	--	+	+	--	0	0	-	0	--	--	N/A	-	0	N/A	--	N/A
SED0042 – Whydown House, Whydown Hill		--	0	-	0	--	0	--	0	--	+	0	--	-	+	--	0	0	-	0	--	--	N/A	-	0	N/A	--	N/A
SED0043 – Land at Balcombe Green		0	0	0	0	--		0	0	+	+	0	+	-	-	0	0	0	-	0	--	-	N/A	--	0	N/A	0	N/A

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
Rye and the Eastern Settlements																												
Beckley																												
BEC0023 - Swan Meadows, Main Street		-	0	0	0	-	0	-	0	+	+	0	--	-	+	-	-	0	-	0	--	-	N/A	-	0	N/A	0	N/A
BEC0025 - Land west of Royal Oak Close	20	-	0	0	0	0	0	-	0	+	+	0	-	+	+	-	0	0	-	0	--	-	N/A	--	0	N/A	0	N/A
BEC0026 - Former Vineyard, Whitebread Lane		-	0	0	0	-	0	-	0	+	--	0	--	+	+	-	0	0	-	0	--	-	N/A	-	0	N/A	0	N/A
BEC0033 - Land north of Main Street		-	0	0	0	-	0	-	0	+	--	0	--	+	+	-	-	0	-	0	--	-	N/A	-	0	N/A	0	N/A
BEC0034 - Land and buildings, North of Main Street		-	0	0	0	0	0	-	0	+	--	0	--	+	+	-	-	0	-	0	--	-	N/A	--	0	N/A	0	N/A
BEC0035 - Land west of Hobbs Lane		-	0	-	0	--	0	-	0	+	--	0	--	+	+	-	0	0	-	0	--	-	N/A	--	0	N/A	0	N/A
BEC0037 - Land adjoining Thornberry Cottage, Main Street		-	0	0	0	0	0	-	0	+	--	0	--	+	+	-	0	0	-	0	--		N/A	--	0	N/A	0	N/A
Brede (Broad Oak)													+															
BRE0003 - Land south of the Broad Oak public house		0	0	0	0	0	0	0	0	+	0	0	0	+	+	0	0	0	-	0	--		N/A	--	0	N/A	0	N/A
BRE0029 - Land rear of The Old Manor, Udimore Road		0	0	0	0	0	0	0	0	+	0	0	0	+	+	0	-	0	-	0	--	-	N/A	--	0	N/A	0	N/A
BRE0046 - Land to the rear of Crown Cottage, Cackle Street		0	0	0	0	0	0	0	0	+	--	0	0	+	+	0	-	0	-	0	--		N/A	--	0	N/A	0	N/A
BRE0028 - The Coppice, Northiam Road, Broad Oak		0	0	0	-	0	0	0	0	+	--	0	0	+	+	0	0	0	0	0	--		N/A	-	0	N/A	0	N/A

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
BRE0030 - Birchwood, Northiam Road, Broad Oak		0	0	0	-	0	0	0	0	+	--	0	0	+	+	0	0	0	0	0	--		N/A	-	0	N/A	0	N/A
BRE0047 - The Barns, adj to Steeplands, Pottery Lane		-	0	0	0	0	0	-	0	+	+	0	--	-	+	-	0	0	-	0	--		N/A	-	0	N/A	0	N/A
Camber																												
CAM0011 - Dudley's Field, Land to the south of Oliphant's Barn, Jury's Gap		--	--	0	0	--	0	--	--	+	--	0	--	-	+	--	0	0	+	0	0		N/A	--	0	N/A	--	N/A
Icklesham (Winchelsea and Winchelsea Beach)																												
ICK0001 - Six Acres, Sea Road		0	-	0	0	0	0	0	--	+	--	0	--	+	+	0	0	0	-	0	-		N/A	--	0	N/A	+	N/A
ICK0025 - Windmill Caravan Park, Willow Lane		0	-	0	0	-	0	0	--	+	--	0	--	+	+	0	0	0	-	0	-		N/A	+	0	N/A	+	N/A
ICK0027 - Land between Morlais Ridge and The Ridge		0	--	0	0	--	0	0	--	--	-	0	--	+	+	0	0	0	-	0	-		N/A	--	0	N/A	+	N/A
Iden																												
IDE0009 - Land on the north of Church Lane		-	0	-	0	-	0	-	0	+	+	0	0	+	+	-	-	0	-	0	--	--	N/A	--	0	N/A	0	N/A
IDE0020 - Land at Wycombe, Grove Lane		-	-	0	0	--	0	-	0	+	+	0	0	+	+	-	-	0	-	0	--	-	N/A	--	0	N/A	0	N/A
IDE0021 - Street Field (larger site), Main Street		-	-	0	0	0	0	-	0	+	+	0	0	+	+	-	-	-	-	0	--		N/A	--	0	N/A	0	N/A
Northiam																											0	
NOR0001 - Land east of B2088		+	0	-	0	-	0	+	0	+	--	0	++	+	+	+	0	-	-	0	--		N/A	--	0	N/A	0	N/A
NOR0002 - Ivy Lodge, Station Road		+	0	0	-	0	0	+	0	+	--	0	++	+	+	+	-	0	-	0	--	-	N/A	--	0	N/A	0	N/A
NOR0023 - Ballards, Station Road		+	-	0	0	-	0	+	0	+	--	0	++	+	+	+	0	0	-	0	--		N/A	--	0	N/A	0	N/A

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
NOR0024 - Land off Main Street, Hayes Farm		+	-	-	-	--	0	+	0	+	--	0	++	+	+	+	--	--	-	0	--		N/A	--	0	N/A	0	N/A
NOR0025a - Land at The Cedars (large), Station Road		+	0	0	0	0	0	+	0	+	--	0	++	+	+	+	-	0	-	0	--	-	N/A	--	0	N/A	0	N/A
NOR0025b - Land at The Cedars (medium), Station Road		+	0	0	0	0	0	+	0	+	+	0	++	+	+	+	-	0	-	0	--	-	N/A	--	0	N/A	0	N/A
NOR0025c - Land at The Cedars (small), Station Road		+	0	0	0	0	0	+	0	+	+	0	++	+	+	+	-	0	-	0	--	-	N/A	--	0	N/A	0	N/A
Peasmarsh																												
PEA0035 - Tanhouse Site B, east Tanhouse Lane		0	0	0	0	0	0	0	0	+	+	0	++	+	+	0	0	0	-	0	--	-	N/A	--	0	N/A	0	N/A
PEA0007 - Kings Head, Main Street		0	0	0	0	--	0	0	0	+	--	0	++	+	+	0	-	-	-	0	--		N/A	--	0	N/A	0	N/A
PEA0025 - Land at Tanhouse Lane		0	0	0	0	0	0	0	0	+	--	0	++	+	+	0	0	-	-	0	--		N/A	--	0	N/A	0	N/A
PEA0038 - Tanhouse Site B, west, Tanhouse Lane		0	0	0	0	0	0	0	0	+	--	0	++	+	+	0	0	-	-	0	--	--	N/A	--	0	N/A	0	N/A
PEA0039 - Pond Cottage, Tanhouse Lane		0	0	0	0	0	0	0	0	+	--	0	++	+	+	0	--	-	-	0	--		N/A	-	0	0	0	N/A
PEA0041 - Fortune Cottage, School Lane		0	0	0	--	0	0	0	0	+	+	0	++	+	+	0	0	0	-	0	--		N/A	-	0	N/A	0	N/A
PEA0040 - Land south of A268, New Cross Farm, Mill lane		0	0	0	0	0	0	0	0	+	--	0	++	+	+	0	-	-	-	0	--		N/A	--	0	N/A	0	N/A
PEA0034 - Land adjacent to Cornerways, School Lane		0	0	-	0	0	0	0	0	+	+	0	++	+	+	0	0	0	-	0	--		N/A	--	0	N/A	0	N/A
PEA0042 - Main Street, Peasmarsh (PEA0041)		0	0	0	-	-	0	0	0	+	+	0	++	+	+	0	0	0	-	0	--		N/A	--	0	N/A	0	N/A
Playden													++															

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
PLA0002 - Land on the south of Playden Lane		+	0	0	0	0	0	+	0	0	0	0	+	-	+	+	-	0	-	0	0	N/A	0	0	0	N/A	+	N/A
PLA0003 - Land at Playden Forge, Rye Road		+	0	0	0	0	0	+	0	0	0	0	+	-	+	+	-	-	-	0	0	N/A	0	0	0	N/A	+	N/A
Rye Foreign																												
RYF0008- Land southwest of Rye Hospital		+	0	0	0	0	+	+	0	+	+	0	+	-	+	+	0	-	-	0	--	-	N/A	0	0	N/A	+	N/A
Rye																												
RYE0025 - Land at Rye Marina		++	0	0	0	--	0	++	--	+	+	0	++	+	+	++	0	0	N/A	0	0	N/A	0	++	--	N/A	++	N/A
RYE0037 - Land at Ferry Road and Cypress Place		++	-	0	0	0	0	++	0	0	0	0	++	-	+	++	-	-	N/A	0	0	N/A	0	++	0	N/A	++	N/A
RYE0039 - Land at Gatesborough Farm, Winchelsea Road		++	0	0	0	--	0	++0	--	+	+	0	++	-	+	++	-	0	--	0	--	-	N/A	--	0	N/A	++	N/A
RYE0042 - Land at Cadborough Farm		++	0	0	0	0	0	++	0	0	+	0	++	-	+	++	-	0	+	0	0	N/A	0	++	--	-	++	N/A
RYE0043 - Land north-west of Udimore Road		++	0	0	0	0	0	++	0	+	+	0	++	-	+	++	0	0	-	0	0	N/A	-	--	0	N/A	++	N/A
RYE0047 - Rye Paddock, Harbour Road		0	0	0	0	0	0	++	--	+	+	0	++	-	+	++	0	0	0	0	0	N/A	0	0	0	N/A	++	N/A
RYE0038 - North Salts adjoining former Freda Gardham School		++	0	0	0	--	0	++	--	+	+	0	++	+	+	++	0	0	+	0	0	N/A	0	-	0	N/A	++	N/A
RYE0054 - Land south of Harbour Road		0	0	0	0	0	0	++	--	+	+	0	++	-	+	++	0	0	0	0	0	N/A	0	-	0	N/A	++	N/A
Udimore																												
UDI0002 - Land north of Vines Farm, Udimore Road		--	0	0	0	0	0	--	0	+	+	0	--	+	+	--	-	0	0	0	--	--	N/A	--	0	N/A	-	N/A
UDI0004 - Land at Udimore Road		--	-	0	0	0	0	--	0	+	+	0	--	-	+	--	0	0	-	0	--	--	N/A	--	0	N/A	-	N/A

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
UDI0005 - Land to the south of Udimore Road		--	-	0	0	0	0	--	0	0	0	0	--	+	+	--	0	0	-	0	--	--	N/A	--	0	N/A	-	N/A

SA Objective	Indicative floorspace	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing				SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
			2a	2b	2c	2d	3a	3b	5a	5b	5c		6a	7a	7b	7c		9a	11a			11b	12a	14a	15a	15b	15c	15d	17a
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b	
Rye and the Eastern Settlements																													
Iden																													
IDE0006 – Land at Orchard Farm, Main St		-	0	0	0	0	0	-	0	+	+	0	0	-	+	-	-	0	-	0	--	-	N/A	0	--	0	0	N/A	

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
Northern Rother																												
Burwash (and countryside locations)																												
BUR0019 - Ashlands, High Street, Burwash		0	0	0	0	--	0	0	0	--	+	N/A	+	+	+	0	0	-	-	0	--	--	N/A	--	0	N/A	0	N/A
BUR0024 - Little Dawes, A265, Burwash		0	0	-	0	-	0	0	0	--	+	N/A	+	+	+	0	0	0	-	0	--	--	N/A	-	0	N/A	0	N/A
BUR0026 - Fields to the rear of 102-109 Shrub Lane, Burwash		0	0	--	0	--	0	0	0	--	+	N/A	+	+	+	0	-	0	-	0	--	--	N/A	--	0	N/A	0	N/A
BUR0036 - Broadview, Heathfield Rd, Burwash East Sussex, TN197HN		0	0	-	0	--	0	0	0	-	+	N/A	+	+	+	0	0	0	-	0	--	-	N/A	-	0	N/A	0	N/A
BUR0038 - Land adjacent to 83 Shrub Lane, Burwash		0	0	0	0	0	0	0	0	+	+	N/A	+	+	+	0	0	0	-	0	--	-	N/A	-	0	N/A	0	N/A
BUR0041 - Rear Plot of Glydwish Place, Frontage Lane		--	0	--	-	--	0	--	0	0	+	N/A	--	-	+	--	0	0	-	0	--	--	N/A	--	0	N/A	--	N/A
Burwash Common																												
BUR0017 - Linkway Field, Burwash Common		-	0	0	0	0	0	-	0	--	+	N/A	-	+	+	-	0	0	0	0	--	--	N/A	--	0	N/A	0	N/A
BUR0018 - Pooks Hill Farm, Land at junction of A265 and Foots Lane, Burwash Weald		-	0	0	0	-	0	-	0	--	+	N/A	-	-	+	-	0	0	0	0	--	-	N/A	--	0	N/A	0	N/A
BUR0020 - The Nutrition Centre (Higher Nature), Goodsoal Lane, Burwash Common		-	0	-	0	0	0	-	0	--	+	N/A	-	+	+	-	0	0	0	0	--	0	N/A	++	--	NA	0	N/A

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
BUR0021 - Land to the north of Luck Farm, Vicarage Road, Burwash Common		-	0	0	0	0	0	-	0	+	+	N/A	-	+	+	-	0	0	0	0	--	-	N/A	-	0	N/A	0	N/A
BUR0040 - Clover Leys Farmhouse		-	0	0	0	0	0	-	0	+	+	N/A	-	+	+	-	0	0	0	0	--	-	N/A	--	0	N/A	0	N/A
Etchingham																												
ETC0021 - Premises at Station Yard, High Street, Etchingham		+	0	0	0	-	0	+	--	--	+	N/A	0	+	+	+	0	0	0	0	--	0	N/A	++	--	N/A	+	N/A
Ewhurst (including Cripps Corner and wider parish)																												
EWH0001 - Goodwin Farm, Adams Lane, Ewhurst		--	0	-	0	0	0	--	0	--	+	N/A	--	-	+	--	-	0	-	0	--	--	N/A	-	-	N/A	--	N/A
EWH0011 - Land at Ockham Farm, Dagg Lane, Ewhurst Green		--	0	0	0	0	0	--	0	+	+	N/A	--	-	+	--	0	-	-	0	--	-	N/A	+	-	N/A	--	N/A
EWH0012 - Wattle Hill, Beacon Lane, Staplecross		-	0	0	0	0	0	-	0	--	+	N/A	--	-	+	--	--	-	-	0	--	-	N/A	-	0	N/A	--	N/A
EWH0017 - St Marks Church, Staplecross		0	0	0	0	0	0	0	0	+	+	N/A	0	+	+	0	0	0	-	0	--	0	N/A	0	0	N/A	0	N/A
EWH0019 - Beaconsfield House, Cripps Corner		-	0	0	0	-	0	-	0	-	+	N/A	--	-	+	-	-	-	-	0	--	-	N/A	--	0	N/A	0	N/A
Hurst Green																												
HUG0001 - and adjacent to Pentwood Place, London Road, Hurst Green		0	0	0	0	0	0	0	0	+	+	N/A	-	+	+	0	-	0	-	0	--	0	N/A	--	0	N/A	+	N/A
HUG0015 - Land at Yew Tree Farm		0	0	-	0	--	0	0	0	--	+	N/A	-	+	+	0	-	0	-	0	--	--	N/A	--	0	N/A	+	N/A
HUG0016 - Land at Cooks Field (northern parcel), Burgh Hill, Hurst Green		0	0	0	0	0	0	0	0	+	+	N/A	-	-	+	0	0	0	-	-	--	-	N/A	--	0	N/A	+	N/A

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
HUG0017 - Sweethayes Farm, London Road, Hurst Green		-	0	0	0	0	0	-	0	+	+	N/A	--	-	+	-	0	0	-	-	--	--	N/A	--	0	N/A	+	N/A
HUG0018 - Land adjacent to Iridge Place, London Road, Hurst Green		0	0	0	0	--	0	0	0	+	+	N/A	-	+	+	0	-	0	-	0	--	-	N/A	--	0	N/A	+	N/A
HUG0019 - Land at Cooks Field (southern parcel), Burgh Hill, Hurst Green		0	0	0	0	0	0	0	0	--	+	N/A	-	+	+	0	0	0	-	-	--	--	N/A	--	0	N/A	+	N/A
HUG0020 - Land adjacent to Mill Barn, Silver Hill, Hurst Green		-	0	0	0	0	0	-	0	+	+	N/A	--	-	+	-	-	0	-	-	--	-	N/A	--	0	N/A	+	N/A
HUG0042 - Land north of Bexhurst Oast, Merriments Lane, Hurst Green		0	0	0	0	--	0	0	0	-	+	N/A	--	+	+	0	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A
HUG0044 - Land on the East Side of London Road, Hurst Green, Etchingham		0	0	-	0	--	0	0	0	--	+	N/A	-	+	+	0	0	0	-	0	--	--	N/A	--	0	N/A	+	N/A
Salehurst & Robertsbridge (including wider parish)																												
SAL0012 - Land at Bishops Lane, Robertsbridge		+	0	0	0	0	0	+	--	--	+	N/A	+	+	+	+	0	0	-	0	--	-	N/A	-	0	N/A	+	N/A
SAL0021 - Land associated with Hackwoods Bungalow, Willards Hill, Robertsbridge		+	0	-	0	--	0	+	0	--	+	N/A	+	-	+	+	0	0	0	0	--	0	N/A	-	0	N/A	+	N/A
SAL0025 - Beech Farm (small site), Knelle Road, Robertsbridge		+	0	0	0	0	0	+	0	+	+	N/A	+	+	+	+	0	0	-	0	--	--	N/A	--	0	N/A	+	N/A
SAL0034 - Beech Farm (large site), Knelle Road, Robertsbridge		+	0	--	0	--	0	+	--	--	+	N/A	+	+	+	+	0	0	-	0	--	--	N/A	--	0	N/A	+	N/A
SAL0038 – Land Adjoining Station Road, Robertsbridge, TN32 5DG		+	0	0	0	0	0	+	--	--	+	N/A	+	+	+	+	-	0	0	0	--	+	N/A	0	-	N/A	+	N/A

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
SAL0039 - Boarsney Farm, Bodiam Road, Robertsbridge, TN32 5SR		--	0	0	0	0	0	--	0	--	+	N/A	--	-	-	--	-	0	-	0	--	0	N/A	--	-	N/A	--	N/A
SAL0040 - Land to the south of Redlands Lane, Salehurst		+	0	0	0	--	0	+	0	--	0	N/A	+	+	+	--	0	0	-	0	--	0	N/A	0	0	N/A	+	N/A
SAL0041 – The Grange, Bodiam, TN32 5UY		--	0	0	0	-	0	--	0	--	+	N/A	--	-	+	--	-	0	-	0	--	-	N/A	--	0	N/A	--	N/A
SAL0047 - Land North of Knelle Road comprising part of Beech Farm, Robertsbridge, TN19 7QE		+	0	-	0	--	0	+	--	--	+	N/A	+	+	+	+	-	0	-	0	--	--	N/A	--	0	N/A	+	N/A
Flimwell																												
TIC0002 - Land between Rosemary Lane and Broom Hill, Berners Hill, Flimwell		0	0	0	0	0	0	0	0	0	+	N/A	--	+	+	0	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A
TIC0038 - Land adjacent Seacox Cocks, Hawkhurst Road, Flimwell		0	0	-	-	--	0	0	0	0	+	N/A	--	-	+	0	-	0	+	0	--	0	N/A	--	0	N/A	+	N/A
TIC0039 - Land north of Broom Hill, Flimwell		0	0	-	0	0	0	0	0	--	+	N/A	--	+	+	0	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A
TIC0041 - Berners Hill Farm, Flimwell		0	0	0	0	0	0	0	0	+	+	N/A	--	+	+	0	-	0	-	0	--	-	N/A	-	-	N/A	+	N/A
TIC0046 - Villa Flair, Union Street, Flimwell		0	0	0	0	0	0	0	0	+	+	N/A	--	+	+	0	-	0	-	0	--	0	N/A	-	0	N/A	+	N/A
TIC0085 - Land rear of Mark Lilly Garage, Flimwell		0	0	-	0	0	0	0	0	-	+	N/A	--	-	+	0	0	0	+	0	--	-	N/A	-	0	N/A	+	N/A
TIC0086 - Church Farm, The Mount, Flimwell		--	0	-	0	-	--	0	0	0	+	N/A	--	-	+	0	-	0	-	0	--	-	N/A	-	0	N/A	--	N/A
TIC0088 – Land West of Bewl Bridge Close, Broom Hill, Flimwell – small site – not suitable due to views		0	0	0	0	0	0	0	0	0	+	N/A	--	+	+	0	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A
Ticehurst																												

SA Objective	Indicative housing units	SA1: Air pollution	SA2: Biodiversity				SA3: Climate change		SA5: Flood risk			SA6: Coastal erosion	SA7: Health & wellbeing			SA9: Access to services	SA11: Heritage		SA12: Land & soil	SA14: Water quality	SA15: Parks and countryside				SA17: Employment		SA20: Roads & travel choice	
SA indicator reference		1a	2a	2b	2c	2d	3a	3b	5a	5b	5c	6a	7a	7b	7c	9a	11a	11b	12a	14a	15a	15b	15c	15d	17a	17b	20a	20b
TIC0023 – Land off Lower Platts, Ticehurst		+	0	0	0	0	0	+	0	--	+	N/A	+	+	+	+	-	0	-	0	--	0	N/A	--	0	N/A	+	N/A
TIC0040 - 40 and 41 High Street, and land to the rear, Ticehurst, East Sussex		+	0	0	0	-	0	+	0	0	+	N/A	+	+	+	+	-	-	-	0	--	-	N/A	-	0	N/A	+	N/A
TIC0042 - Land at Ridgeway Farm, Burnt Lodge Lane, Ticehurst		-	0	0	0	--	0	-	0	+	+	N/A	--	+	+	-	-	0	-	0	--	-	N/A	-	0	N/A	+	N/A
TIC0048 - Land at Tinkers Lane, Ticehurst		0	0	0	0	0	0	0	0	+	+	N/A	-	+	+	0	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A
TIC0049 - Land north of Steellands Rise and Banky Field, Ticehurst		+	0	0	0	-	0	+	0	--	+	N/A	+	+	+	+	0	0	-	0	--	--	N/A	--	0	N/A	+	N/A
TIC0059 – Land north of Horsegrove Avenue, Ticehurst		+	0	0	0	0	0	+	0	0	+	N/A	+	+	+	+	0	0	-	0	--	-	N/A	--	0	N/A	+	N/A

