

Report to	-	Cabinet
Date	-	1 October 2018
Report of the	-	Executive Director
Subject	-	Development and Site Allocations Local Plan – Proposed Submission

Recommendation to COUNCIL: That:

- 1) the Proposed Submission version of the Development and Site Allocations Local Plan and the related Policies Map, as presented at Appendix 2, be approved; and
 - 2) the Proposed Submission Development and Site Allocations Local Plan, the Sustainability Appraisal and other supporting documents be published alongside the Local Plan for a 6-week period for representations and subsequent submission to the Secretary of State, with the Executive Director having delegated authority to make non-substantive, including presentational, alterations.
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Head of Service: Tim Hickling

Lead Cabinet Member: Councillor G.P. Johnson

Introduction

1. This report puts forward a revised, final draft version of the Development and Site Allocations (“DaSA”) Local Plan (at Appendix 2) for consideration ahead of its publication to allow for representations to be made from individuals and organisations. Following the representation period (of six weeks), it will be submitted, together with duly-made representations on it, to the Planning Inspectorate for examination on behalf of the Secretary of State.
2. As this is the version of the Local Plan that the Council is seeking to adopt, it needs to be considered by full Council, which will be on 15 October. This special meeting has been arranged because of the importance of the Local Plan in carrying forward the higher-level policies of the adopted Core Strategy and to enable consultation before the Christmas period, which should allow submission within the timeframe of transitional arrangements set by the new National Planning Policy Framework (NPPF, 2018). The early identification of suitable housing sites is also important in helping to stimulate the housing supply, especially as delivery has not been keeping up with the annualised requirement and there is less than a 5-year supply of deliverable sites as a result.

Context for the DaSA Local Plan

3. The DaSA Local Plan has been prepared to be in general conformity with the strategic policies for the district as set out in the Core Strategy Local Plan,

adopted in September 2014, following a robust independent examination, not least in respect of its housing provisions. The Core Strategy is effectively “Part 1” of the Council’s Local Plan, with a recognised need to be supplemented by this DaSA Local Plan, as “Part 2”, which identifies the sites required to meet the development provisions of the Core Strategy, as well as sets out more detailed development management policies. Hence, it covers the same period as the Core Strategy; that is, up to 2028.

4. Hence, in relation to residential development, the DaSA is required to identify sufficient sites to meet the Core Strategy’s housing targets and to update development boundaries accordingly. Of course, the responsibility for the identification of sufficient development sites to meet the Core Strategy’s requirements (which will be a fundamental issue at examination) is now shared between the DaSA Local Plan and the number of Neighbourhood Plans that have been or are being prepared across the district.
5. There is mixed progress on Neighbourhood Plans (NPs) which were being prepared when the previous version of the DaSA was published. Two are now made (Sedlescombe and Salehurst & Robertsbridge) and three others (Ticehurst, Rye and Crowhurst) are expected to be submitted later this year; three further ones, for Battle, Etchingam and Burwash, are still in preparation. These areas were not covered by the draft DaSA in terms of identifying the required housing sites and this remains the situation, with a clarification about the interim situation, as noted at paragraph 16 below.
6. The DaSA continues to include allocations at Hurst Green and Peasmarsh to meet their respective housing requirements, notwithstanding that Hurst Green Parish has recently been designated as a ‘neighbourhood area’ and it is understood that Peasmarsh is intending to apply for this status. This is because there is now insufficient time to prepare a new NP against current housing targets and because the draft DaSA has already carefully considered and consulted upon options in these areas, views on which can be expressed through the forthcoming consultation process. Fairlight was not covered by the draft DaSA as the Parish Council had started the NP process. However, this has been abandoned; hence, the DaSA now also includes site allocations there.
7. As mentioned above, the other key contextual change is the recent publication of the revised NPPF, in July 2018. The NPPF states that local Plans submitted before 24 January 2019 will be examined on the basis of the earlier, 2012, NPPF. Regard has nonetheless been had to the NPPF, 2018 and it is believed that the thematic policies in particular are consistent with relevant national policies in the new NPPF. However, it is strongly advised that the DaSA is submitted before this January date to avoid complications to the plan process.

Development of the proposed Submission DaSA Local Plan

8. An ‘Options and Preferred Options’ version of the DaSA Local Plan was subject to a 10-week consultation period in late 2016/early 2017 in order to enable local residents, business and other stakeholders the opportunity to comment on the important choices to be made. The comments received have been carefully considered and have clearly informed the current, final version of the Plan.

9. Further to the 'Options and Preferred Options' document, the dialogue with other authorities and key agencies has been maintained, as appropriate, and additional evidence gathering carried out where necessary to ensure the robustness and deliverability of the Plan's policies. Of particular note, while the initial Scoping Report for the Habitats Regulations Assessment screened out likely significant effects on international nature conservation sites, a further assessment has been undertaken, as discussed later in the report.

The 'Proposed Submission' document

10. The current Plan follows a similar structure as the earlier consultation version (which followed the Core Strategy), with the obvious difference that options are no longer presented. The two substantive parts of the Plan set out 'Development Policies' and 'Site Allocations' respectively.
11. With the exception of access standards for new dwellings, the form of policies within the final Plan is not significantly different from 'preferred options' previously indicated, although policy criteria have been refined to reflect comments in many instances. Where options were previously presented without a preference – for renewable energy developments, affordable housing, custom and self-build housing, as well as the future use of the Northeye site at Bexhill – policies are now put forward, as summarised below. A number of draft site allocations have not been carried forward to the new Plan, essentially due to the fact that planning permission has been granted for their development in the intervening period.

Development policies

12. The range of the topic-based policies, grouped into six sections, is the same as in the draft document. Each topic is still considered as needing to benefit from detailed Local Plan policies and, while there is always scope to add to these, these are regarded as appropriate having regard to the types of applications that tend to come forward locally.
13. As noted above, policies have been refined for:
 - a) *renewable energy developments* – while not identifying specific sites for solar energy or wind farms, a criteria-based policy is put forward; larger schemes should have an energy strategy;
 - b) *affordable housing* – the new NPPF, 2018 substantially aligns with the Core Strategy policy, so subject to some refinement, its requirements are confirmed; there are lower thresholds in the High Weald AONB than elsewhere, where small schemes prevail, as allowed for under the NPPF;
 - c) *access standards* – the Building Regulations contain an optional requirement for homes to be designed to be suitable for life-long living, in terms of higher accessibility/adaptability standards, which covers a range of features to make most common adaptations easier and less expensive. Given the general feeling that people should be supported to live in their own homes in later life, as well as the large increase in older person households over the coming years, it is proposed that the standard (which is relatively low cost) is adopted across the board, subject to only limited exemptions;
 - d) *custom and self-build housing* – the Council's Register of the desire for such housing shows a modest level of demand but it is likely that this may increase in the future. Based on available evidence, a requirement of 5%

of plots on medium-sized (20+ dwellings), potentially increasing to 10% over time, is put forward, which is similar to other recent, relevant Plans.

14. It is to be noted that a number of topic policies are refinements of established 2006 Local Plan policies, while draft new policies for water efficiency, the retention of sites of social or economic value, conservation of the High Weald AONB, biodiversity and sustainable drainage received widespread support.

Site Allocations

15. An initial 'Overview' chapter highlights the progress towards meeting housing requirements for every town and village where further allocations are required, as well as the provisions being made through the DaSA Local Plan as well as in NPs. For the settlements covered by the DaSA, it identifies that the site allocations will collectively, when fully developed, deliver some 1,632 homes over the 10-year period 2018-2028, relative to a Core Strategy target for these settlements of at least 1,273 homes. Supply in the villages is generally very close to the respective targets, with additional sites mainly in Bexhill. It is considered appropriate to provide a degree of flexibility consistent with the spatial strategy, while recognising the legitimate constraints on identifying suitable sites.
16. Neighbourhood Plans are expected to bring forward at least a further 784 dwellings new homes over the same period. Plans are now in place for Sedlescombe and Salehurst and Robertsbridge. However, this still leaves a need for some 575 dwellings to be identified in NPs yet to be submitted. While progress is being made, as noted earlier, to give reassurance to the Secretary of State as to the Council's commitment to meet its housing obligations, it is considered necessary to set out a clear policy framework for the consideration of proposals in advance of NPs (and this DaSA Local Plan), which is done in the Overview chapter.
17. Of particular note in relation to Bexhill is the identification of three linked development areas on land at North Bexhill, together providing for some 530 dwellings – the largest allocation in the Plan. Careful attention is given to the provision of green space in this area, focused around a "greenway" along the valley of the Combe Haven brook. The redundant Northeye Training Camp is also identified as an opportunity to supplement housing delivery in the town, as well as to provide much needed formal sports pitches. While there has been considerable local objection to the development of land off Spindlewood Drive for some 160 dwellings, the highway authorities have stated they are satisfied that a development of this scale can be satisfactorily accommodated by the local and strategic highway network, subject to some local highway improvements and detailed on-site measures. In terms of views from Natural England, they are currently looking at sustainable drainage and this is covered by a criterion set out in the site policy wording.
18. In terms of shopping provision, an updated retail assessment has confirmed that it is still appropriate to make a retail allocation for a medium-sized foodstore and that the most suitable site at the southern end of Beeching Road, with a visual and direct pedestrian link to Terminus Road.
19. The previously preferred housing sites in the villages largely remain the most suitable following further examination. Changes include amendments to developable areas of sites in Beckley Four Oaks, enlargement of sites in

Broad Oak, the exclusion of residential (as opposed to holiday accommodation) at the central car park site, Camber and the replacement of a footway/cycleway proposal in Westfield with one for allotments. There are now two allocations at Fairlight Cove, which have followed discussion with the Parish Council, one already having a resolution to grant planning permission and the other being the previously identified Strategic Housing Land Availability Assessment (SHLAA) site, but now including a land for a doctor's surgery and amenity space as well as housing.

20. There is a small requirement for Gypsy and Traveller housing, for six pitches. This is proposed to be met, as put forward in the Options and preferred options document, with an allocation for five pitches at North Bexhill and one pitch on a previously approved site on the edge of Battle.

Sustainability Appraisal and Habitats Regulations Assessment

21. The Sustainability Appraisal (SA) prepared alongside the Options and Preferred Options document has been updated and assesses all policies and site allocations against agreed sustainability objectives. It also updates the earlier assessment of alternatives, where there are substantial changes in circumstances, or new reasonable alternatives have been put forward. The Non-Technical Summary is attached as Appendix 1. The SA will also be subject to consultation.
22. An updated Habitats Regulations Assessment (HRA) has been undertaken, through specialist consultants and in close liaison with Natural England. 'Appropriate assessments' have been undertaken for certain situations and, having regard planned mitigation measures, has concluded that the DaSA's policies will not adversely affect the integrity of the relevant international sites. The most significant of these is the approval and implementation of a 'Sustainable Access and Recreation Management Strategy (SARMS) for the Dungeness Complex of sites. Consultation on a draft SARMS has already been carried out jointly with Folkestone & Hythe District Council and a final draft version will be presented for Council consideration shortly. The HRA includes assessments of the impacts on Pevensey Levels, Lewes Downs and Ashdown Forest Special Area of Conservation (SACs), but does not find adverse effects.

Next Steps

23. Subject to full Council consideration, the DaSA Local Plan and supporting documents will be published under regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended, for the required six weeks consultation. The aim is for this publicity period to run from 26 October to 7 December, with subsequent submission to the planning Inspectorate by 24 January next year.
24. All individuals and organisations that made comments on the Options and Preferred Options document will be notified, as will be a wide range of consultation bodies. There will be publicity both on the Council's website, via My Alerts and through the press. A public examination by an independent Planning Inspector will follow. The Examination will test the Plan against national tests of 'soundness' and relevant legal requirements to determine if the Council can proceed to adopt the Local Plan.

Conclusions

25. Cabinet is asked to recommend to Council that the Proposed Submission version of the Development and Site Allocations Local Plan and the related Policies Map, as presented at Appendix 2, be approved; also, that the Sustainability Appraisal and other supporting documents be published for a 6-week period for representations and subsequent submission to the Secretary of State, with the Executive Director having delegated authority to make non-substantive, including presentational, alterations.

Dr Anthony Leonard
Executive Director

Risk Assessment Statement

The Council has a duty to maintain an up-to-date Local Plan and the DaSA Local Plan is integral to this. There are risks associated with the Core Strategy quickly becoming dated, having regard to the recent NPPF, which will be managed by the prompt submission of the DaSA and the immediate commencement of a review of the Core Strategy.

Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) Non-Technical Summary

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

The Local Plan for Rother district

4. Rother District Council's Local Plan is being prepared in two parts:

- The Local Plan Core Strategy ("the Core Strategy")
- The Development and Site Allocations |Local Plan ("the DaSA")

The Core Strategy is the first, principal part of the Council's Local Plan to 2028. It was adopted in 2014. It sets out the Council's strategic policies, including the overall spatial strategy, as well as higher-level "core" policies for a number of strategic matters, relating to sustainable resource management, communities, local housing needs, economy, environment, transport and accessibility and implementation and monitoring. The spatial strategy sets out not only the overall quantum of housing and business growth, but also the distribution of housing growth between individual towns and villages. The Core Strategy was subject to its own Sustainability Appraisal process.

5. The DaSA, as the second part of the Local Plan, carries forward the spatial strategies, strategic objectives and core policies set out in the ['Core Strategy'](#). It will achieve this by reviewing existing site allocations and development boundaries, and by allocating specific areas of land for particular uses in line with the development provisions of the Core Strategy. It will also set out more detailed policies where these are needed to provide guidance for the effective management of development in relation to key issues, such as housing needs, including affordable housing thresholds, employment and tourism sites, development in the countryside, housing standards, landscape, biodiversity and other local environmental matters.
6. It follows that the SA of the DaSA will not need to re-appraise the strategic decisions made in the Core Strategy, but will need to undertake sustainability assessments of reasonable alternatives in relation to both the thrust of options for generic, topic policies that flow from the overall vision, objectives and strategic policies, as well as of specific sites that may be put forward to meet the development strategy for particular areas/settlements.

Introduction to the Sustainability Appraisal (SA) of the DaSA

7. The Sustainability Appraisal (SA) Report of the DaSA represents the combined output of the SA and SEA processes and hereafter is called “the DaSA SA”. This ‘Non-Technical Summary’ provides an overview of the DaSA SA.
8. This SA relates to the ‘Proposed Submission’ version of the DaSA. It has been prepared in tandem with the production of the Local Plan itself.
9. This SA has been preceded by two earlier SA reports:
 - a. DaSA SA Scoping Report. The Scoping Report established the SA Framework for assessment, including decision-aiding questions and indicators. It also documented the results of the gathering of evidence concerning the current social, economic and environmental conditions in the District. The DaSA SA Scoping Report identified key sustainability problems or likely future problems by looking at statistical trends and comparing the performance of the District with East Sussex as a whole, the South East and England. It was prepared in consultation with the strategic environmental bodies – Natural England, the Environment Agency and Historic England.
 - b. SA of the DaSA Options and Preferred options. This report appraises the optional broad policy directions in relation to each of the topics identified for policy coverage in the DaSA, as well as the emerging draft policies where these were identified. It also appraised all the reasonable alternatives for sites that had been identified, either through the Strategic Housing Land Availability Assessment (SHLAA) process, as submissions from landowners or developers, or through site surveys by planning officers. It effectively provides a draft version of this report, which has both updated earlier assessments where there have been material changes in circumstances and undertakes assessments of policies in their latest form.
10. This version of the DaSA SA is published to support the DASA 'Proposed Submission' version of the document and the related Policies Map.¹.
11. As stated earlier, as well as drawing upon the DaSA SA Scoping Report and the SA of the ‘Options and preferred Options’ version of the DaSA, this report draws upon the SA of Part 1 of the Local Plan – the ‘Core Strategy’. The DaSA SA needs to be read in this context.

Outcomes of the Sustainability Appraisal (SA) process

12. The outcome of the preliminary ‘Scoping’ stage of the DaSA SA process was a refined SA Framework, comprising a set of sixteen Sustainability Objectives, supported by ‘Decision-aiding questions’ and indicators. The Scoping Report was produced in close liaison with statutory environmental agencies (Natural England, the Environment Agency and Historic England).
13. Table 1 overleaf summarises the assessment of the potentially significant effects of the DaSA policies on the SA Objectives. The SA Objectives are in

¹ In accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

bold and italics. The DaSA policies and the detailed appraisal of them can be found in Appendices 3 and 4 of the Main Report.

Table 1: Summary of the Likely Significant Effects of the DaSA on the SA Objectives

Sustainability Appraisal Objectives	
1	<p><i>Ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home</i></p> <p>The significant effects on this SA Objective are beneficial. The Plan successfully identifies a good supply of site-specific deliverable opportunities to meet the housing requirements of the Core Strategy for the relevant parts of the District (i.e. the urban areas and villages not covered by Neighbourhood Plan areas). These support sympathetic accommodation of housing growth in sustainable locations and appear likely to be deliverable and viable. Policy provision setting out how the supply of suitable sites will be maintained across the District complements allocations, as does the identification of development boundaries which allows for small scale schemes on unidentified sites.</p>
2	<p><i>Improve the health and well-being of the population and reduce inequalities in health</i></p> <p>Overall effects of the Plan on the health objective are positive. Positive effects stem from a number of housing policies that aim to improve the living environment, including the policy for accessible and adaptable homes and for specialist housing for older people. Environmental policies also have beneficial effects, such as policies on environmental pollution and biodiversity & green infrastructure. Site specific policies that lead to the provision of, or are readily accessible to, green space (with its acknowledged health benefits) and other recreation facilities are also beneficial.</p>
3	<p><i>Reduce crime and the fear of crime</i></p> <p>Effects on this objective are overwhelmingly neutral. Those positive effects that have been identified relate to specific sites, their proximity to a police station and/or the extent to which they are to be specifically designed to incorporate a degree of informal surveillance/overlooking of public areas.</p>
4	<p><i>Reduce deprivation and social exclusion</i></p> <p>Most policies have been judged to have either a neutral, or a minor beneficial effect, on reducing deprivation and social exclusion. Most significant is the policy for widespread provision of accessible and adaptable homes and a proportion of affordable homes accessible for disabled people, as well as the policy for specialist housing for older people. Depending on their location, a significant number of sites identified are considered to have positive effects due to promoting integration with existing communities. The impacts of recreational and social facilities serving Sidley, the most deprived part of Bexhill, in particular, are positive.</p>
5	<p><i>Raise educational achievement levels and develop the opportunities for lifelong learning</i></p> <p>Overall, there are beneficial effects for this objective from the Plan. There has been a considerable focus on locating residential development in locations with good accessibility to education facilities. This is in accordance with the service centre approach.</p>

6	<p><i>Sustain economic growth and competitiveness and encourage innovation in higher value, lower impact activities</i></p> <p>Cumulatively, the Plan has a positive effect on economic growth. In particular, policy DEC3 offers valuable protection to existing employment sites, whereas Policy DCO1 similarly offers some protection to sites of social or economic value. Policy DIM1 on comprehensive development is considered to be likely to be beneficial on balance in promoting mixed-uses sites that secure a range of benefits, including economic, in addition to residential. Policies that define town centre and commercial areas (BEX12, BEX13, BEX14, and BEX6) are viewed to have a positive effect on economic growth and competitiveness, while site allocations for business development, most notably BEX1, provide significant opportunities for creating jobs to meet local needs.</p>
7	<p><i>Improve accessibility to services and facilities for all ages across the District</i></p> <p>Overall, there are beneficial effects for this objective from the Plan. Insofar as the Core Strategy distribution of development was primarily a 'service centre' based approach, given that the DaSA follows on from, and conforms with, this strategy, there has been an in-built focus on locating development in locations with good accessibility to education facilities, particularly primary schools. The overwhelming majority of sites score positively in this respect. Policies to strengthen town and district centres in Bexhill, as well as detailed policies to protect community facilities also positively support this objective, as do locational criteria for older persons' housing.</p>
8	<p><i>Encourage and facilitate increased engagement in cultural and leisure activities</i></p> <p>Generally, the Plan has a positive effect on this objective. Many generic policies are neutral or not relevant to this objective, although Policy DCO1 which seeks to protect sites of social value is a notable positive effect. Most site allocations are positive, since their proximity to cultural and leisure facilities have been a key factor in the consideration of their suitability. Perhaps the most significant policies in the Plan in terms of Objective 8 is BEX15, which defines a 'Bexhill Cultural Area' where arts, culture and tourism will be the primary focus, and BEX4 for a new leisure facility.</p>
9	<p><i>Improve efficiency in land use and encourage the prudent use of natural resources</i></p> <p>Whilst the balance of effects on this objective is positive, the scale of development required inevitably means that development of greenfield sites will be necessary. Therefore, the significance of beneficial effects is reducing over time as previously developed land and infill opportunities unfortunately become scarcer. Viable schemes for suitable brownfield site opportunities are identified, including the large redundant former prison/training centre site at Northeys on the edge of Bexhill. Site allocations generally seek to make best use of developable land, consistent with providing requisite living conditions and amenities.</p>
10	<p><i>Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage</i></p> <p>In a rural District that is accommodating significant growth, positive scores for reducing road congestion are difficult to achieve, particularly as public transport options also tend to be limited or infrequent, and subject to increasing economic pressures nationwide. Nonetheless, the Plan has endeavoured to increase travel choice by prioritising accessible locations and by including requirements for improvements in pedestrian and cycle facilities and, for major schemes bus services, in site allocations.</p>

11	<p><i>Reduce emissions of Greenhouse gases</i></p> <p>An increase in the number of households and businesses in the District has the potential for an adverse effect on reducing greenhouse gas emissions, although the Plan makes positive efforts to reduce the need to travel by car on a site-by-site basis by promoting walking and cycling. Although no specific sites for renewable energy developments have been identified, a positive, criteria-based policy is included. The Plan will probably avoid a net loss of trees, since all areas of woodland have been avoided and several policies require enhancement.</p>
12	<p><i>Minimise the risk of flooding and resulting detriment to people and property</i></p> <p>The effects on objective 12 are overwhelmingly positive, notably policy DEN5. Its emphasis on sustainable drainage (SuDS), as well as the means to achieve this, is a major positive. Promotion of wetland habitats under Policy DEN4, which may have a multi-functional benefit as SuDS, may also be indirectly beneficial. The majority of site allocations have successfully avoided or mitigated significant flood risk. Scores are therefore generally positive and reduce the proportion of properties at risk from flooding in the District.</p>
13	<p><i>Maintain, improve and manage water resources in a sustainable way</i></p> <p>The Plan, particularly Policy DRM1, will have a positive effect on water efficiency by applying a higher water efficiency standard. Site policies are also generally positive, avoiding groundwater source protection zones / aquifers and generally positively incorporating watercourses and wayleaves within layouts.</p>
14	<p><i>Conserve and enhance biodiversity by protecting both designated and non-designated but locally important species and habitats</i></p> <p>The Plan will have a generally positive and beneficial overall effect on objective 14, particularly via policy DEN4 'Biodiversity and green space', but also DEN5, HAS1 and HAS4. The positive measures required by DEN4, as well as Core Strategy EN5, on which it is based, include a focus on provision of priority habitats and connectivity, as well as the avoidance of harm to existing ecological features. These sentiments have generally been reflected in site layouts and parameters which also positively address the issue; hence, there are a number of positive scores for this objective in relation to site policies.</p>
15	<p><i>Protect and enhance the high quality natural and built environment including landscape and townscape character and particularly the protection of the High Weald AONB</i></p> <p>Several DaSA policies are identified as having positive effects on townscape and built environment. Policies DEN1 and DEN2 have a notably positive effect on landscape and High Weald AONB character, supported by DEN3, DEN4 and DEN7.</p> <p>Policies DHG7, DHG9, DHG11 and DEC1 in particular will have positive effects in terms of townscape.</p> <p>In addition, many site-specific policies are also deemed to have a positive effect. This is despite the fact that many are actually greenfield sites within the AONB itself. This is because sites have been carefully selected to avoid negative landscape impacts as far as possible on key features of the High Weald AONB. Positive treatments have included landscaping to enhance the immediate environment.</p>

16	<p><i>Reduce waste generation and disposal, and achieve the sustainable management of waste</i></p> <p>Effects on objective 16 are largely neutral. There are two household waste recycling facilities in the District – at Mountfield (on the A21 north of Battle) and at Pebsham (Between Bexhill and Hastings). Development locations accessible to these two sites, and to a secondary extent, accessible to the more numerous ‘bring’ recycling sites are deemed to score more positively against this objective. Policy DHG7 is a new policy that requires provision of recycling facilities is also a notable positive.</p>
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Statement on the difference the SA process has made

14. The SA process has been a fundamental tool in the development of the Development and Site Allocations Local Plan (DaSA). The SA has provided evidence to inform decision making and helped with developing options. It has also been crucial in helping to assess any changes or suggested changes to the Plan policies as they develop and are subsequently refined. It acts as a way to highlight any possible negative effects and ensure that, where possible, the policies include mitigation of these effects.

How to Comment on the SA Report

15. Persons and/or organisations will be able to comment on this SA report, including statements of objection or support, via the consultation on the overarching plan – the Development and Site Allocations Plan (DASA) – Proposed Submission.
16. Please refer to the Council's web-site for details
<http://www.rother.gov.uk/DaSA>.