

Supplementary Document 1

Delivery Plan

1. CLEAN GROWTH – ensuring the impact of development is not detrimental to the environment, that we consider the environment through our planning policies and own development and economic regeneration initiatives.
2. HEALTHY PLACES – putting in place policies and encouraging initiatives which have a positive impact on the environment and the district.
3. SUSTAINABLE SERVICES – leading by example: ensuring that minimum impact on the environment is core to the Council’s operations and services provision.

Consultation Responses:

Rother Environmental Group

Other actions should be framed as co-benefits to the overarching objectives of reducing carbon emissions and loss of biodiversity. There might be merit in the council making fewer action points, but stronger ones with more substance. The Policy themes are not as clear as they could be, and could be substituted as follows:

1. Reducing the Impact of Development (instead of Clean Growth)
2. Improving our Environment (instead of Healthy Places)
3. Leading by Example (instead of Sustainable Services)

In order to get the priorities right, the actions need to be ranked against a number of criteria, to include whether they are:

Impactful – the reductions of carbon emissions, loss of biodiversity and co-benefits need to be quantifiable and substantial.

Affordable – the costs need to be understood and factored into future council budgets or explained to stakeholders who will be needing to fund the actions.

Deliverable – the actions need to be within the Council’s remit to implement or directly influence. Action points where the Council can only ‘encourage’ others will be harder to implement. Clarity is needed where the Council has referred to ‘partners’ as to who they are.

Timely - how soon an action can take effect needs to be considered. The Council needs to identify some 'quick wins' to demonstrate the sincerity of the strategy. However, some actions that take longer to implement can also be more impactful, so should not be neglected.

Explainable – any action needs to be saleable to residents and businesses, with the co-benefits clearly identified. There needs to be a willingness to support the actions.

The Council should not shy away from big decisions.

As a general comment, the Council needs to be specific where policies can be linked to legislation (as in Air Quality standards).

We would also encourage the Council to take note of policies in Neighbourhood Plans for adoption/adaptation throughout the whole district,

Sussex Wildlife Trust

Whilst we support the three policy themes which provide the framework for the delivery plan, SWT is again concerned that the ambition is quite limited for Clean Growth. Ensuring that development is not detrimental to the environment has not been the status quo for some time. The requirement for 'net gain' has been included in national policy since 2012 and strengthened further in 2019. If RDC want to ensure a sustainable future for the district, including achieving carbon neutrality, it has to recognise that simply preventing harm is not sufficient, too much damage has already been done. RDC should always be aiming to better the current situation.

SWT recommends that the wording for Clean Growth is amended as follows to demonstrate more ambition from the council in line with Government support for restoring nature:

'CLEAN GROWTH – ensuring development positively impacts on the environment and that environmental gains are embedded in our decision making, planning policies and own development and economic regeneration initiatives'

Similarly for Sustainable Services, we believe the council should be doing more than simply minimising impacts. RDC should be actively pursuing opportunities for positive impacts. We recommend that this policy theme is reworded to:

'SUSTAINABLE SERVICES – leading by example: ensuring that positive impact on the environment is core to the Council's operations and services provisions.'

Our Vision

SWT supports the vision and particularly the commitment to the natural environment being enhanced and protected. We feel this vision could be a bit more descriptive and inspiring in terms of nature being restored and part of everyday life within the district.

Partnerships

We strongly support the acknowledgement of the importance of working in partnership and the recognition that 2030 should be the target. Whilst we applaud the council's action, it must be acknowledged that RDC can only influence a relatively small proportion of the district's emissions, therefore working with partners such as the county council and the LEP to reach other sectors must be a priority.

Campaign for Protection for Rural England East Sussex

At times, the actions within the Strategy and accompanying Action Plan feel more like aspirations. It is hard to judge success against an action that is not SMART. It would be helpful for actions to be concise and measurable and linked to an estimated carbon saving/ data analysis. This would also enable actions to be prioritised.

Rye Conservation Society

The plan is comprehensive, but is very high level and is therefore missing detail on what the hierarchy of priorities will be and on specifics around what will be done by whom and by when.

Smart Digital District: Work with partners to take forward initiatives that bring Rother into the smart digital age					
CLEAN GROWTH	Action	Timescale	Delivery Target	Lead Officer	Partners required
	<ul style="list-style-type: none"> • Develop a 'Smart Digital District' action plan with partners 	2021	TBA	ESO	ESCC

Consultation Responses:

Rye Conservation Society

For a number of the Delivery Plan actions further consultation will be helpful, e.g. on what specifically will happen around the Digital District initiative, when it will happen and how the communities and stakeholders will be engaged? The Rye Conservation Society would be interested in, for instance, how 'smart' infrastructure is integrated in the historic environment of the Conservation Area. Set out when and how will further consultation take place.

Environmental Health

Also forge links with tech companies - who get their products promoted?

Ticehurst Parish Council

TPC supports the need to work collaboratively.

High Weald AONB

We also welcome the recognition that to meet your commitments you will need to take a co-ordinated approach and work with others. The High Weald AONB partnership has been actively encouraging the need to move to a low carbon society for more than twenty years and given our experience, we look forward very much to collaborating actively with you to help you meet your ambitious climate emergency targets and reduce your impact on the environment.

We welcome the recognition of the High Weald AONB under the Biodiversity Action Plan Priority but its omission from the other priorities implies the countryside generally and the High Weald more specifically has nothing to offer those priorities.

Instead, the Environment Strategy should recognize that a healthy functioning landscape underpins the Strategy and is integral to several of the Action Plan priorities. There needs to be an understanding that a working countryside supporting environmentally responsible land-based activities not only has the potential to sustainably provide our essential needs – food, water, energy, employment, residential and business development – but to do this in a way that helps address climate change and ecological breakdown.

Rother Environmental Group

- i. A clearer definition of smart digital district is needed, including how success is measured in the context of tackling climate change. A recognition is needed that ‘digital’ does by no means equate with ‘low or zero carbon’.
- ii. Implement imposition of planning condition, with immediate effect, on requirement for electric vehicle (EV) charging points to all new dwellings and commercial developments. This should include variations to existing consents where sought. Use of other planning conditions relating to all major applications relating to smart digital infrastructure.
- iii. Encourage installation of smart lamp posts in urban areas. Recognition required that in rural areas, other solutions needed, to restore dark skies.
- iv. Council to install smart meters in all buildings it owns.
- v. Lobby others for standardisation of smart meters and electric charging points.
- vi. Increase digital awareness. Investigate ways of communicating within the council, with suppliers etc., to be more digitally aware.
- vii. Lobby ESCC to increase broadband speeds.

Campaign for Rural England East Sussex

Rother can progress the achievement of this aim by ensuring that in approving any planning application into the future, they ensure especially for any major application at least, that provision of smart digital infrastructure is conditioned.

Rother should exert maximum pressure on East Sussex CC and any other relevant partners to ensure the best possible digital network throughout the whole District, especially where current service is below standard, which inevitably is in the most rural areas, where arguably it is needed most for sustainable living.

Smart Digital District: Work with partners to take forward initiatives that bring Rother into the smart digital age					
CLEAN GROWTH	• Access funding opportunities to deliver Smart Digital District action plan	2021 - 2030			

Consultation Responses:

None

Smart Digital District: Work with partners to take forward initiatives that bring Rother into the smart digital age					
	• Deliver Smart Digital District action plan	2025 - 2030			

Consultation Responses:

None

Green Economy:					
CLEAN GROWTH	Action	Timescale	Delivery Target	Lead Officer	Partners required
	<ul style="list-style-type: none"> • Work with partners to encourage the retraining and reskilling of people in retrofit, insulation and environmentally friendly industries to encourage a local 'green economy' with particular emphasis on lower economy areas across the district 	2021 - 2028	TBA	ESO	ESCC Education Private sector business

Consultation Responses:

idverde:

In the next five to seven years we will be training and educating all of our colleagues about sustainability and how they can play their part. We will be addressing the training, knowledge and environmental literacy of our colleagues so that each and every one of them understands their impact on the environment and how they can play a role in contributing to improving the sustainability of the organisation. We also anticipate that this will unlock further ideas, potential and buy in from all areas of the organisation.

High Weald AONB Unit:

The challenge for the Environment Strategy will be how it can harness social and economic activity for Rother district to provide low-carbon goods and services – food, water, energy, employment, residential and business development, recreation – while also protecting the area’s countryside and the landscape’s ability to provide those goods and services. As above, the AONB Management Plan should be used to ensure your efforts meet this challenge and we will be able to support you finding ways to address barriers to environmentally sustainable economic growth, barriers such as identifying the necessary skills, access to finance and business support, and public procurement.

Environmental Health

In reference to partners - Job centres and green charities/organisations too?

Rother Environmental Group:

Insulation – the importance of insulation, both in retrofitting and in new-build, cannot be overstated, as providing it is correctly fitted, it does not depend on end-user behaviour.

Higher standards of insulation are an absolute need for all domestic and commercial building improvements. Council to require renewable energy schemes to all larger development.

Marine Conservation – encourage local fisherman to protect the marine environment.

Sussex Wildlife Trust

General comments on all actions:

2. Green Economy

Again the ambition for nature must be much more positive if we are going to address the climate and ecological emergencies. A green economy should include the enhancement of biodiversity and ecosystem services, not just prevent their loss.

We do support the potential actions and particularly divestment from fossil fuels. However, given the rural nature of Rother there needs to be actions towards ensuring a healthy functioning and well-connected landscape across the district. Promotion of sustainable rural communities based on regenerative agriculture and low carbon industries is key for RDC. There are clear Government ambitions for a nature recovery network that contributes to a prosperous economy and this should be clearly reflected in the ambitions for Rother District.

Transport Futures East Sussex

Referring to all Green Economy actions:

Green Economy - Support actions described.

Suggest add: 'Through 'partnerships' support measures to increase mode share of journeys for all purposes by sustainable modes of transport'.

Campaign for Rural England Sussex

In the Action Points, insulation should be at the forefront of all domestic and commercial building improvements.

Higher standards of insulation are an absolute need as well as encouragement of renewable energy schemes.

Green Economy:					
	• Boost the local economy by creating demand for low-carbon goods and services	2022 - 2025			

Consultation Responses:

Woodland Trust

Green economy – add support for carbon-sequestering land uses, in particular silviculture.

High Weald AONB Unit

The challenge for the Environment Strategy will be how it can harness social and economic activity for Rother district to provide low-carbon goods and services – food, water, energy, employment, residential and business development, recreation – while also protecting the area’s countryside and the landscape’s ability to provide those goods and services. As above, the AONB Management Plan should be used to ensure your efforts meet this challenge and we will be able to support you finding ways to address barriers to environmentally sustainable economic growth, barriers such as identifying the necessary skills, access to finance and business support, and public procurement.

Environmental Health

Are you able to provide any details about how RDC can boost demand for low-carbon goods?

Rother Environmental Group

Local Economy - to assist with boosting the local economy to create demand for low carbon goods and services, set up an online directory of local firms and services meeting the criteria.

Ethical Leisure Providers - promote through ratings, hotels, restaurants and cafes that use products that are locally sourced with low carbon footprint, low use of plastics, meat-free options, low waste.

HEALTHY PLACE	Action	Timescale	Delivery Target	Lead Officer	Partners required
	<ul style="list-style-type: none"> Support SME businesses to access funds and expertise for reducing carbon pollution 	Ongoing	TBA	ESO	Private sector business

Consultation Responses:

High Weald AONB Unit

We welcome the recognition of the High Weald AONB under the Biodiversity Action Plan Priority but its omission from the other priorities implies the countryside generally and the High Weald more specifically has nothing to offer those priorities. Instead, the Environment Strategy should recognize that a healthy functioning landscape underpins the Strategy and is integral to several of the Action Plan priorities. There needs to be an understanding that a working countryside supporting environmentally responsible land-based activities not only has the potential to sustainably provide our essential needs – food, water, energy, employment, residential and business development – but to do this in a way that helps address climate change and ecological breakdown.

The good news is that a great deal more is now known about the policy and other changes needed to move strongly towards a better future as we are already seeing the proliferation of innovative practices particularly at a local level: regenerative agriculture, community development, transition towns, local living economies, new regional food systems, locally owned and managed renewable energy, and innovative business models and investment institutions.

Given our experience and that RDC is a long standing and valued partner of ours, we would be very happy to meet at an appropriate time to discuss the ways the High Weald AONB partnership can most usefully support your efforts and your aspirations for Rother district.

Environmental Health

In reference to partners: Would ESCC and adjacent LAs also be involved with this? Able to work together so everyone knows which funds and expertise are available?

SUSTAINABLE SERVICES	Action	Timescale	Delivery Target	Lead Officer	Partners required
	<ul style="list-style-type: none"> • Take forward plans for ethical banking that does not invest in fossil fuels 	2025		ADR	

Consultation Responses:

Rother Environmental Group

Ethical banking – the Council should disinvest from pension funds with investment in carbon polluting activities.

Green Audit - in relation to the Council’s own purchasing power, it should conduct a green audit of all its major suppliers and adjust future purchasing in favour of the suppliers showing the best overall green credentials, with bias in favour of those that are locally based.

Funding Implementation of Policies - we recommend applying for funds for reducing carbon pollution at every opportunity.

Campaign for Rural England Sussex

It is not clear what is meant by the reference to ethical banking, whereas a drive should be made to achieve disinvestment by the Rother controlled/involved Pension Funds from investment in carbon polluting activities and any other financial investments made by Rother.

Why not in relation Rother’s own purchasing power, conduct a green audit of all its major suppliers and adjust future purchasing in favour of the suppliers showing the best green credentials, with perhaps a bias in favour of local? All contracts should contain specifications which minimise significant negative environmental impacts, linked to the Sustainable Procurement element of the council’s Procurement Strategy, including for example, the materials used in building contracts/management, chemicals used in the grounds maintenance contract etc.

Air Quality: Acting to reduce air pollution that can also help to limit climate change					
CLEAN GROWTH	Action	Timescale	Delivery Target	Lead Officer	Partners required
	<ul style="list-style-type: none"> • Explore options to make urban areas, such as Bexhill town centre, car free or restricted vehicular access 	2025 - 2030		ESO	ESCC, Highways

Consultation Responses:

Highways England:

We note that Section 3 on air Quality within the Draft Environmental Strategy 2020-2030 document includes the action “*We will explore options to make urban areas, such as Bexhill town centre, car free or restricted vehicular access.*” Since the A259 trunk road runs through Bexhill, **we will wish to ensure that any restrictions on car or vehicular access in Bexhill town centre does not have a detrimental effect on the A259 either from a capacity or road safety perspective. We suggest you add Highways England as a partner for the first bullet point in the table on page 22.**

Please continue to consult us as the Environment Strategy develops. In particular, please discuss any options you are considering to reduce vehicular traffic in urban areas such as Bexhill.

Woodland Trust:

Add encouragement of trees, hedges and green walls to tackle pollution.

Ticehurst Parish Council

TPC supports the proposal to make town and village centres car free or for restricted vehicular access – Ticehurst has a plan that is ready to deliver this objective.

Burwash Parish Council

In order to help the reduction of traffic across the parish public transport options across the Parish should be increased, especially with links to the stations and to Heathfield for shopping trips. Ensure that new planning applications in rural areas are restricted to brownfield sites and that green fields are not built on.

Environmental Health

In reference to partners: Environmental Health, who do the air quality monitoring in RDC and can help provide data to back up any improvements in air quality.

Rother Environmental Group

The heading [Air quality] is misleading, as it can be interpreted in different ways. The overall priority is to mitigate against and adapt to climate change and to tackle the ecological crisis.

Monitoring Stations - increase air quality monitoring stations throughout RDC.

Car Use Restrictions – the Council is to encourage ESCC in making urban areas low emission zones, car-free or restricted access where possible. Engagement needed with relevant other transport providers to ensure that public transport is improved in those areas.

....

Reducing Car Use - the survival of independent shops (especially post Covid-19) is essential – high street shops should be given priority support.

Bexhill Heritage

Car Free/Restricted Access to Town Centres – Bexhill.

This offers the possibility of several worthy initiatives for improving townscape and quality of life linking to other aspects of the draft – in particular the creation of “social meeting places” with improved floorscapes; better settings for existing buildings; additional tree planting; better air quality and improved footfall for nearby commerce.

Sussex Wildlife Trust

It is also not clear if the car use data within the data review includes commuting as well as business travel. It is often the case that commuting to/from work is a significant proportion of an individual’s and business’s carbon footprint.

Campaign for Rural England Sussex

Any attempts to make urban areas either car-free or restricted access, will have to be done in concert with the County Council as Highway Authority. Also, engagement needs to be made with relevant other transport providers to ensure that public transport is retained and improved in those areas.

For new commercial developments in Bexhill, Rother should consider introducing a workplace car parking provision levy. Generally, Rother could introduce measures to discourage cars coming into the town centres of Bexhill, Rye and Battle. This could include positive moves to encourage car sharing.

Trees, plants and grass absorb air borne pollutants, particularly PM 2.5, which are amongst the pollutants most harmful to humans. Rother must ensure that as far as possible none of its actions entails the removal of trees and other vegetation. Whilst the main impact of this is when Rother wears its Planning Authority hat, Rother can also encourage planting schemes by others in the community. One of the recommendations of the ‘Building Better, Building Beautiful’ Commission’s final report is the mass planting of urban orchards and Rother should consider how its planning function could support this. However, Rother also needs to ensure that the ‘right trees are planted in the right place’ and recognise that tree regeneration may be a better solution in some areas.

Rother’s fields, grasslands, and soils can also mitigate climate change, reverse ecological collapse, and contribute to a low/zero carbon economy while continuing to provide society with the food it needs. A balance must be struck between meeting the District’s housing need and protecting multifunctional green spaces.

The core principle should be to reduce carbon and then air quality will improve.

Air Quality: Acting to reduce air pollution that can also help to limit climate change					
	<ul style="list-style-type: none"> Explore the use of future planning policy to require electric vehicle charging points and cycle parking to all new homes and businesses 	2021	TBA	HoSS&P	ESCC, D&B partners

Consultation Responses:

Southern Gas Network (SGN)

We are interested in working with local authorities to support their journey towards decarbonisation and to highlight the role a low carbon gas network could have to play.

There are also opportunities in:

- understanding how you are looking at transport improvements; e.g. charging points for ultra-low emission vehicles, development of ultra-low emissions zones, and the use of hydrogen in transport;
- support energy efficiency for vulnerable customers, which is beneficial both for people and the environment;

Environmental Health:

It would be great if these measures are given a priority status in Planning Policy. It will help Environmental Health who undertake air quality work in RDC and comment on planning applications with respect to air quality. It will help us ensure that mitigation measures are definitely included in all new properties and don't have to be retrofitted later.

The grant scheme currently being provided seems to only pay for 75% of the costs of introducing charge points. The Council has identified for this strategy the resource of one staff member whose role could apply for grants, etc. Additional resource will likely be needed too, in order to cover the extra 25% and for any contingencies, if the introduction of off street charge points is part of this strategy.

Bexhill Heritage

These should be required on all new developments and individual new dwellings. They should be prominent and easily accessible from the vehicle. If the exact configuration of the sockets cannot be resolved because of ongoing technical changes the supply at least should be laid in and appropriately safety blanked for the time being. This will avoid disruptive changes to street and buildings subsequently.

Transport Futures East Sussex

Suggest: Adopt 'Transport for New Homes' checklist against which to assess sustainability of a development through its propensity to include design features and measures to secure highest take-up of non-car modes. The checklist is attached. This is also relevant in a context of 'energy demand scenarios'. Good estate design can reduce energy demand from the transport sector, the fastest growing source of CO2 emissions.

Campaign for Rural England Sussex

There appears no good reason now why future planning decisions for both residential and commercial developments should not include electric vehicle charging points and facilities for cycle parking. Cycle storage provision is already included within DaSA policy DHG 7. Rother should encourage the provision of hydrogen filling facilities. London has set the right tone with the introduction by London Transport of hydrogen fuelled buses.

Concomitantly, Rother must use every opportunity to encourage the use of walking, cycling and public transport.

Rye Conservation Society

It would be good to see how the output from ESCC and Transport for the South East plans will inform RDC's strategy. Likewise, it'd be helpful to understand how the emerging RDC Environmental Strategy will relate to the neighbourhood planning process and what, if anything, they will be [able to?] do to align with this strategy.

Air Quality: Acting to reduce air pollution that can also help to limit climate change					
	<ul style="list-style-type: none"> Work with ESCC and our District and Borough partners to deliver an Electric Vehicle Plan for the County which will bring forward EV charging points across the district 	2021		ESO HoSS&P	ESCC, D&B partners

Consultation Responses:

Ticehurst Parish Council

- TPC supports the need for a district or county wide policy on electric car charging points to ensure uniformity within a geographical area.
- Pool of electric cars for rent within communities should be encouraged to lessen the need for car ownership, especially in areas with poor public transport.

Environmental Health

Also welcome by Environmental Health who have already had some constructive discussions with Planning Policy about integrating air quality mitigation requirements into the new local plan. Env Health would welcome more discussions with a view to increasing the number of charge points across the district. Note, Environmental Health is also a member of Sussex Air, which collaboratively works towards such aims.

In reference to partners: Again, Environmental Health should be involved as we are part of Sussex Air and get to hear about On Street Charging Schemes and other initiatives etc....

Air Quality: Acting to reduce air pollution that can also help to limit climate change					
	<ul style="list-style-type: none"> Reduce the need to own or use a car through managing developments in the Local Plan 	2021 - 2030		HoSS&P	ESCC, D&B partners

Consultation Responses:

Bexhill Heritage

We support this idea as it will reduce the adverse effects on townscapes brought about by extensive hardened areas in the streetscape in front of buildings.

Campaign for Rural England Sussex

RDC should take note of policies in Neighbourhood Plans for adoption/adaptation throughout the whole district:

Rye NP Policy T1 – Connectivity and Sustainable Transport:

Rye NP Policy E4 – Renewable and Low Carbon Energy:

Ticehurst NP Policy R4 – Develop Footpath and Cycle Networks

Ticehurst NP Policy INF3 – Community Energy Projects

Crowhurst NP Policy CF2 – Rights of Way

Robertsbridge NP Policy EC2 – Encourage home working

Robertsbridge NP Policy IN3 – Non-car provision

Robertsbridge NP Policy IN4 – Pedestrian safety

Robertsbridge NP Policy IN5 – Communications Infrastructure

Robertsbridge NP Policy IN7 – Sustainability

Such initiative would answer some of the questions posed in this section of the Consultation. The upcoming Local Plan gives a timely opportunity to do so.

Air Quality: Acting to reduce air pollution that can also help to limit climate change					
HEALTHY PLACE	Action	Timescale	Delivery Target	Lead Officer	Partners required
	<ul style="list-style-type: none"> • Bring forward initiatives which encourage walking and cycling; this includes ensuring walking and cycling friendly development is encouraged through Planning Policy 	2021	TBA	HoSS&P	

Consultation Responses:

Burwash Parish Council

Burwash Parish Council is in the final stages of developing a Neighbourhood Plan that has ... development of new cycle paths, footpaths that are wheelchair friendly with access gates for large dogs with for example dog gates.

Fairlight Parish Council

[FPC plan for] Investigating the formation of a footpath group supported by East Sussex County Council.

Environmental Health

In reference to partners: Active Rother; sustrans; other charitable bodies?

Rother Environmental Group

Green Tourism - Work with businesses, active travel organisations and ESCC to promote more walking and cycling as part of tourism with incentives for green travellers. Offer discounted entry fee to sports centres if arriving by zero carbon travel.

Active Rother Targets - set targets for increasing walking and cycling journeys across RDC, promote and encourage such activities. Quantify outcomes.

Safer Cycling - promote BikeAbility training for adults.

School Children -work with partners to reward pupils who walk, scooter or cycle to school.

Footway/Shared Use Cycle Paths - all planning applications for new housing or commercial to require a footway/shared use path where property meets road.

Bexhill Heritage

There would be a beneficial side effect from the implementation of this new policy. If residents became used to walking and cycling, which might well encourage others, the living environment in the Town Centre would improve. This could lead to more confidence in investment in property, maintenance, and improvement in the Town Centre to the benefit of the Victorian and Edwardian heritage.

Transport Futures East Sussex

The Co2 emissions from transport are on the rise. This is partly due to fast rising sales of SUV type vehicles (Science and Technology Committee Report, 'Clean Growth: Technologies for meeting the UK's emissions reduction targets' Twentieth Report of Session 2017-19). These vehicles are ill suited to the many lanes in Rother DC, churning verges and making walking and cycling unpleasant.

Suggest at bullet point 6, after 'walking' add 'bus passenger facilities' which I think may come under RDC jurisdiction. This could notionally include secure parking at bus stops and bus shelter facilities.

Rye Conservation Society

Ensure joined up thinking on land use and transport e.g. ensuring walking, cycling and other sustainability measures are considered in planning decisions making and in prioritising CIL etc for appropriate infrastructure provision. There are significant strategic gaps in sustainable transport links in and around Rye.

Air Quality: Acting to reduce air pollution that can also help to limit climate change				
HEALTHY PLACE	• Explore options to promote and accelerate the take-up of electric vehicles in the District	2021		ESO

Consultation Responses:

Ticehurst Parish Council

- Pool of electric cars for rent within communities should be encouraged to lessen the need for car ownership, especially in areas with poor public transport.

Burwash Parish Council

Burwash Parish Council is in the final stages of developing a Neighbourhood Plan that has ... reducing car journeys through the promotion of car sharing,

Environmental Health

In reference to partners add: Environmental Health/Sussex Air.

See also Southern Gas Network above regarding hydrogen vehicles.

Air Quality: Acting to reduce air pollution that can also help to limit climate change					
SUSTAINABLE SERVICES	Action	Timescale	Delivery Target	Lead Officer	Partners required
	<ul style="list-style-type: none"> • Explore ways to incentivise taxi drivers to take up electric vehicle use 	2021	TBA	HoSEHL&CS	Taxi drivers

Consultation Responses:

See also SGN above regarding hydrogen vehicles.

Environmental Health

Discuss options with Environmental Health who licence taxi drivers. If this direction of travel can be integrated into some policy or some financial incentives provided to taxi drives to take up electric vehicle use, would be very positive. Might be able to apply for funds for such initiatives. BHCC for e.g. have retrofitted the private sector bus network with Euro 6 engines, following a successful grant application to DEFRA (I think).

In reference to partners required add: Environmental Health/Licencing/Sussex Air.

Rother Environmental Group

Taxi Licensing Fees – Council to insist that taxi drivers change to electric vehicles (or other low carbon, such as hydrogen), providing incentive to change vehicles and adding a premium of 25% to petrol run taxis. Work alongside adjoining districts to harmonise licensing fees.

Campaign for Rural England Sussex

To encourage taxi drivers to change to electric vehicles, give a 25% discount on current fees to electric vehicles, or add a premium of 25% to petrol and 35 % to diesel vehicles: current fees are below:

Private Hire Operator's Licence (3 years) £315

Private Hire Operator's Licence (5 years) £525

Private Hire Operator's Licence over 20 vehicles (3 years) £630

Private Hire Operator's Licence over 20 vehicles (5 years) £1000

Air Quality: Acting to reduce air pollution that can also help to limit climate change					
SUSTAINABLE SERVICES	<ul style="list-style-type: none"> Explore options with partners and contractors to move away from diesel vehicles to electric fleet (e.g. waste contract) 	2021 - 2028			Business partners, contractors

Consultation Responses:

See also SGN above regarding hydrogen vehicles.

Idverde (current activity): Our fleet department procures the cleanest and most efficient engine vehicles for use on our contracts such as those that are Euro 6 compliant and/or use hybrid or full electric technology. These are procured in line with client requirements and the client’s budget. welcomes any opportunity to work with the Council on reducing our impact on the environment

Rother Environmental Group

Electric Vehicles – Council to encourage all vehicle contractors to use electric vehicles.

Campaign for Rural England Sussex

Why not in relation Rother’s own purchasing power, conduct a green audit of all its major suppliers and adjust future purchasing in favour of the suppliers showing the best green credentials, with perhaps a bias in favour of local? All contracts should contain specifications which minimise significant negative environmental impacts, linked to the Sustainable Procurement element of the council’s Procurement Strategy, including for example, the materials used in building contracts/management, chemicals used in the grounds maintenance contract etc.

Air Quality: Acting to reduce air pollution that can also help to limit climate change					
SUSTAINABLE SERVICES	<ul style="list-style-type: none"> Undertake a grey fleet review to ensure car use is reduced to only where absolutely necessary and initiatives are in place to discourage car use where possible, including electric pool cars for visiting officers 	2020 - 2021			Business partners, contractors

Consultation Responses:

Campaign for Rural England Sussex

Preferential rates of car expenses should be paid to Council employees/councillors who use electric vehicles, or lower amounts for those who continue to use non-electric vehicles. Could the Planning site visit bus be electric?

PRIORITY: Waste: Goods and materials are re-used and recycled rather than discarded as waste					
CLEAN GROWTH	Action	Timescale	Delivery Target	Lead Officer	Partners required
	<ul style="list-style-type: none"> Consider options for storage of bins on communal schemes eg underground, easier recycling 	2022 - 2025		HoSH&C	

Consultation Responses:

Southern Gas Networks

There are also opportunities for Rother District Council to help drive the decarbonisation of gas locally by ensuring food waste is collected separately and pursuing opportunities to use it to produce biomethane.

Environmental Health

A carrot and stick approach might also help re: waste. Currently, resources for Environmental Health to prosecute fly tippers are low but to prevent fly tipping and burning of waste, we need to ensure household waste collection is sufficient and household recycling centres are open when the public need them. Also need to ensure legitimate waste operators are encouraged. Work with the Environment Agency to ensure that obtaining a waste transfer permit is as easy and cheap as possible.

Rother Environmental Group

Trial a reduction in the size of refuse bins to investigate whether it reduces amount of waste, without encouraging fly-tipping.

Recycling - encourage more recycling within Community Waste sites as provided at Mountfield. Small Bring Centres: Expand this facility. Provide visual statistics at Bring sites for public.

Hardcore Collection - re-instate hardcore collection points at Community Waste sites.

Bulky Waste - have one off days for bulky waste collections in towns and bigger parishes.

Food Waste – Council to introduce this facility working with other local waste collection authorities and use it within anaerobic digesters to generate electricity.

PRIORITY: Waste: Goods and materials are re-used and recycled rather than discarded as waste					
HEALTHY PLACES	Action	Timescale	Delivery Target	Lead Officer	Partners required
	<ul style="list-style-type: none"> Encourage a focus on 'prevent' and 're-use' through delivery of 'top tips' for residents through MyAlerts 	On going		ESO	Residents

Consultation Responses:

Southern Gas Networks

We are interested in working with local authorities to support their journey towards decarbonisation and to highlight the role a low carbon gas network could have to play.

There are also opportunities in:

- circular economy projects; e.g. repurposing of old barriers, PE pipe etc into new useful products to close the loop on waste.

Environmental Health

In reference to partners required add: Waste and recycling companies. Businesses that 'upcycle' and repair and sell previously owned products, charities.

Rother Environmental Group

Council to promote Waste Hierarchy at every opportunity, including leading by example. Set targets within its operations for the reduction of waste by whatever means and publicise these internally and externally.

Education is critical to success in reducing waste, and critical in this is for the public to refuse to purchase goods which are excessively packaged.

Council should benchmark itself against the best performing waste collection authorities, adopting where it can best practices from those better performing authorities.

Local Champions - recruit, train and support local volunteer waste champions. Encourage people (Street Champions) from community friends/mutual aid organisations post Covid-19 to engage in environmental matters.

Promote Good Practice - promote the efforts of local re-use and recycling initiatives, particularly by voluntary, charitable and community groups by publicising them, offering further practical support where possible.

Campaign for Rural England Sussex

Education is critical to success in reducing waste, and critical in this is for the public to refuse to purchase goods which are excessively packaged.

Rother’s involvement with waste, apart from its own in-house operations, is that it is the collector of household waste, so its responsibility is to encourage a reduction in the production of waste by its residents. This again should be not just by example but by hard-hitting education to encourage rejection of excessive packaging and ensuring that products purchased can be and must be recycled or re-used where possible.

PRIORITY: Waste: Goods and materials are re-used and recycled rather than discarded as waste					
SUSTAINABLE SERVICES	Action	Timescale	Delivery Target	Lead Officer	Partners required
	<ul style="list-style-type: none"> Promote waste reduction in Council offices, including implementing a plan to reduce/eliminate single-use plastics 	2020		ESO	

Consultation Responses:

Environmental Health

In reference to partners required add: IT to help reduce printing costs.

PRIORITY: Waste: Goods and materials are re-used and recycled rather than discarded as waste					
	<ul style="list-style-type: none"> Share expertise with other councils, public bodies and local businesses through the 'Green Team' and Stakeholder partnership 	2020 - ongoing		ESO	Business sector partners, public sector partners

Consultation Responses:

High Weald AONB

We also welcome the recognition that to meet your commitments you will need to take a co-ordinated approach and work with others. The High Weald AONB partnership has been actively encouraging the need to move to a low carbon society for more than twenty years and given our experience, we look forward very much to collaborating actively with you to help you meet your ambitious climate emergency targets and reduce your impact on the environment.

Environmental Health

Could the Council help provide some local financial incentives for repair and recycling initiatives? Such as local bicycle shops who do up and sell old bikes, or outlets who repair and re-sell electrical goods? Or set one up ourselves

Campaign for Rural England Sussex

Rother must foster the efforts of local re-use and recycling initiatives, particularly by voluntary, charitable and community groups by publicising them, offering further practical support where possible.

Food waste is a subject which Rother has not so far tackled and should. It is best tackled by a joint effort with surrounding local authorities, particularly Hastings and Eastbourne to form a consortium to collect food waste and use it in a locally located anaerobic digester to generate electricity.

Rother must set targets within its operations for the reduction of waste and should publicise these internally and externally each month to encourage everyone to try to follow the lead of the LA.

Rother must benchmark itself against the best performing waste collection authorities, adopting where it can best practices from those better performing authorities. It must use its commercial muscle with its present waste collection company to improve the environmental standards of the whole operation

PRIORITY: Energy					
CLEAN GROWTH	Action	Timescale	Delivery Target	Lead Officer	Partners required
	<ul style="list-style-type: none"> Adapt planning strategy and criteria to encourage development of community owned renewable energy generation (such as solar power or wind farms) 	2021		HoSP&S	

Consultation Responses:

Ticehurst Parish Council:

RDC should consider grants to ensure that village and town amenity buildings can become more self-sufficient, and house rooftop solar panels.

Fairlight Parish Council:

We would raise that in respect of RDC's Environmental Strategy, consideration is given to the point that the quoted 'Priority Area' of 'sustainable energy production' is not at the expense of the other Priority Areas of an 'environmentally friendly Council' with an aim of 'Protecting Biodiversity' across the District.

Environmental Health

Shouldn't this [We will consider the scope for sustainable energy solutions as part of the Local Plan Review] be action one? Reviewing and consulting will inform us about what we can achieve in RDC?

In reference to partners required add: Green tech companies. Forge partnership working to benefit all and determine what is possible.

Rother Environmental Group

Wind Turbine Power - we encourage the Council to support increasing the number of on shore sites as well as offshore, except within the HWAONB.

Bio-mass – Council to promote this form of sustainable energy, in particular relating to short rotation coppicing.

Campaign for Rural England Sussex

Rother had the chance to introduce more innovative land use policies when it approved the recent DaSA, approved only in late 2019. It failed to grasp the opportunity since the two relevant policies (DRM2 and 3) contain no positive encouragement for more local low carbon or renewable energy facilities. More negatively still, it set its face against any large scale wind turbine schemes, when clearly the national mood for such is changing to being more receptive to these wind farms. We accept that locating these may be difficult within the High Weald AONB but sites could be found in the rest of Rother.

In DRM 3, the bar is set too high for the requirement to even consider renewable technologies: it should be set at 50 dwellings and 5000 sq. m. of non-residential floorspace. We see no reason why commercial buildings of say over 5000 sq m should not be obliged to install solar panels and should be oriented to maximise solar gain.

Given the pressure currently Rother is facing towards approving all housing applications, the low offer in para 1 of DRM 3 is meaningless and will not encourage moves in that direction.

....

In the emerging Local Plan, Rother should identify potential renewable energy sites.

PRIORITY: Energy					
HEALTHY PLACES	Action	Timescale	Delivery Target	Lead Officer	Partners required
	<ul style="list-style-type: none"> Explore investing in local green energy, including public-private partnerships and community owned schemes, or forming a non-profit, municipally owned green energy company such as district heating 	2022 - 2030		ESO	SELEP, ESCC, Local communities

Consultation Responses:

High Weald AONB

We also welcome the recognition that to meet your commitments you will need to take a co-ordinated approach and work with others. The High Weald AONB partnership has been actively encouraging the need to move to a low carbon society for more than twenty years and given our experience, we look forward very much to collaborating actively with you to help you meet your ambitious climate emergency targets and reduce your impact on the environment.

Rother Environmental Group

Community Tariffs: the Council should insist that these are provided by totally green suppliers.

Campaign for Rural England Sussex

Rother could invest in renewable energy projects in Rother and support community-led low carbon energy projects.

PRIORITY: Energy					
	<ul style="list-style-type: none"> Tackle fuel poverty, through energy efficiency measures appropriate for listed and character buildings 	Ongoing		ESO	Health (CCG NHS)

Consultation Responses:

Ticehurst Parish Council

- TPC supports permitted development for disused buildings in appropriate manner.

Burwash Parish Council

... Rother should ensure that all new developments should be powered by environmentally friendly heating systems

Southern Gas Network

Among the toughest of challenges that will need to be overcome in Rother and across the UK to meet net-zero will be decarbonising heat (i.e. the heating of buildings, water and industrial processes). Today, around a third of the UK's greenhouse gas emissions come from heating, and about 83% of UK homes are heated by boilers that burn natural gas.

We (SGN) are collaborating with others to find future net zero solutions for heat and building the evidence to demonstrate a pathway to decarbonise the gas networks. Most experts agree net zero cannot be achieved through electrification alone. Changing the gas that flows through our gas network from natural gas to hydrogen (which burns without emitting direct greenhouse gases) could be key to achieving net zero in a way that is cost-effective and minimises disruption for customers.

We (SGN) are already reducing the environmental impact of the gas we transport through our network and have 35 biomethane plants connected to our networks supplying the annual needs of 200,000 homes with locally sourced and sustainable green gas. Our aim is to increase this to 450,000 homes supplied by 2026. Utilising separated food waste collected from homes and businesses in Rother to generate biomethane to green the gas network is a potential way we could look to work together to deliver both our aims.

We operate under a regulatory framework set by Ofgem and in December 2019 submitted our business plan to Ofgem for the activities we will look to undertake during the RIIO-GD2 price control period which is due to run from 2021-26.

As part of this we have set targets to reduce our total carbon footprint by more than 25%. This will mainly come from an accelerated programme to replace our old iron gas mains with new more efficient plastic polyethelene (PE) pipes. This will reduce leaks, improve safety and help make our network ready to transport zero carbon hydrogen in future. It is worth noting that as a regulated business our initiatives are dependent on funding from the regulator, Ofgem. We are also seeking to:

- replace 50% of our commercial vehicle fleet with ultra low emission vehicles where possible;
- Improve energy efficiency and install LED lighting and building management systems across all our medium and large sites;
- install solar PV panels on all our occupied sites;
- reduce leakage from our network through innovation, mains replacement and several other initiatives;
- work closer with our supply chain and develop a Supplier Code that ensures our suppliers will work on reducing their environmental impacts;
- continue to reduce waste to landfill across the business and improve rates of reusing and recycling waste, applying circular economy principles; and
- improve biodiversity on our sites where we own land.

Another key piece of activity for us in the next five-year period is developing the evidence on the role hydrogen and other decarbonised gasses have to play to deliver net zero in a way that minimises costs and disruption for customers. This evidence will inform key UK government decisions around 2024 on how heating will be decarbonised and the roll out of solutions at scale across the UK from the second half of the 2020s.

Our H100 Fife project will look to construct and demonstrate a 100% hydrogen network in Levenmouth, Fife and supply around 300 homes with green hydrogen produced using offshore wind power to split water by the process of electrolysis. We hope to start construction in 2021 and for it to be operational from 2022. The safe demonstration of hydrogen in a purpose built network will allow us to move on to projects to convert existing parts of the network. **We are keen to work with Rother council to explore the potential for hydrogen demonstration projects in the area.**

Fuel poverty

We are mindful of the challenges faced by Rother council when balancing the need to decarbonise heating and the health of vulnerable residents in fuel poverty. Gas connections can greatly reduce the cost of heating a home to the safe minimum temperature as defined by NHS England. Cold homes are a bigger killer across the UK than road accidents, alcohol or drug abuse.

SGN deliver free gas connections to fuel poor households under the Fuel Poor Network Extension Scheme. For the period known as GD2, 2021–26, our target is to provide 5,000 connections in our southern region which includes Rother. **We are keen to work with Rother council to identify those who could benefit from a free gas connection. This can deliver both a large reduction in fuel costs and the means to deliver low carbon heating in future as we inject more green gasses like hydrogen and biomethane into our network.**

We are interested in working with local authorities to support their journey towards decarbonisation and to highlight the role a low carbon gas network could have to play.

There are also opportunities in: ...

- support energy efficiency for vulnerable customers, which is beneficial both for people and the environment;

Rye Conservation Society

How do we provide support and advice on making existing buildings more sustainable, in particular how to overcome challenges for retro-fitting sustainability to historic listed buildings?

PRIORITY: Energy					
	<ul style="list-style-type: none"> Explore opportunities for funding of private sector housing retrofit schemes to improve the environmental impact and fuel efficiency of the District's housing stock 	2020 - 2030		HoSESL&CS	SELEP, Public & private sector partners, residents

Consultation Responses:

Woodland Trust

Add support for retention of existing trees as well as new planting.

Ticehurst Parish Council

- Creating accommodation for the homeless should be considered when using disused buildings with sustainable energy solar panels incorporated into any scheme.
- TPC would like RDC to consider reduction in rates – business and residential – for good, proven environmental practise.

Environmental Health

In reference to partners required add: and Environmental Health's Housing Team.

Rother Environmental Group

Planning conditions – make provision for domestic batteries coupled to solar pv where possible, new development to be orientated to optimise solar energy harvesting. Set stringent requirements for onsite energy production, in particular relating to solar pv and solar thermal.

Campaign for Rural England Sussex

Insulation is not mentioned in this paragraph and it should be: reduction in energy usage can be easily achieved and could affect all current buildings within Rother whereas policies in respect of new build affect a minute proportion of the total built environment. Rother needs as a minimum to ensure that its own estate is properly insulated, and that can be used as a signal to all of what can be achieved in a mix of buildings. It should publicise the availability of grants to those within Rother to achieve the best insulation possible. If the energy demand of a building can be reduced to a minimum, then the amount of renewables needed to meet this demand would be proportionately smaller and therefore less expensive.

The proposals however in this paragraph are all positive and should be pursued.

....

In particular, Rother should enforce minimum energy efficiency standards in the private rented sector, where generally existing standards are lower. Also, Rother should encourage retrofitting of energy-saving devices and insulation in all housing, we suggest starting with social housing.

PRIORITY: Energy					
	<ul style="list-style-type: none">Enforce minimum energy efficiency standards in the private rental sector	Ongoing		HoSESL&CS	Landlords

Consultation Responses:

None (some related mentions under other actions)

PRIORITY: Energy					
SUSTAINABLE SERVICES	Action	Timescale	Delivery Target	Lead Officer	Partners required
		<ul style="list-style-type: none"> Identify council owned sites suitable for renewable energy eg car parks for solar pv 	2021		HoSAT&R

Consultation Responses:

Rother Environmental Group

Electrical Vehicle Charging Points - work with all stake holders to unify provision of Electric Charging points in Council owned car parks – advocate for this at a national and international level.

Rye Conservation Society

Provide more affordable off-street parking for Rother residents and employees to free up space in the town centre of Rye for pedestrians and essential visitor parking. Car parks should include electric charging points in future.

PRIORITY: Energy				
	<ul style="list-style-type: none"> Undertake an audit of all council-owned properties with the objective of retrofitting to the highest possible environmental standards where appropriate and cost effective to do so, including the use of renewable energy such as thermal, solar, PV or heat pumps on all buildings 	2020		ESO

Consultation Responses:

Ticehurst Parish Council

- RDC should consider grants to ensure that village and town amenity buildings can be come more self-sufficient, and house rooftop solar panels.

Rother Environmental Group

Insulation – as a minimum, the Council is to ensure that its own estate is properly insulated, and that can be used as a signal to all of what can be achieved in a mix of buildings. Publicise the availability of grants to those within Rother to achieve the best insulation possible.

Campaign for Rural England Sussex

Insulation is not mentioned in this paragraph and it should be: reduction in energy usage can be easily achieved and could affect all current buildings within Rother whereas policies in respect of new build affect a minute proportion of the total built environment. Rother needs as a minimum to ensure that its own estate is properly insulated, and that can be used as a signal to all of what can be achieved in a mix of buildings. It should publicise the availability of grants to those within Rother to achieve the best insulation possible. If the energy demand of a building can be reduced to a minimum, then the amount of renewables needed to meet this demand would be proportionately smaller and therefore less expensive.

PRIORITY: Biodiversity					
CLEAN GROWTH	Action	Timescale	Delivery Target	Lead Officer	Partners required
	N/A				

Consultation Responses:

None, as there is no action for clean growth under biodiversity

PRIORITY: Biodiversity					
HEALTHY PLACES	Action	Timescale	Delivery Target	Lead Officer	Partners required
	<ul style="list-style-type: none"> Encourage residents and community groups to take part in the 'Big Climate Fightback' by planting a tree https://campaigns.woodlandtrust.org.uk/page/46713/data/1?locale=en-GB 	Ongoing		ESO	Residents

Consultation Responses:

Woodland Trust:

Add action points on protecting and restoring ancient woodland; support for UK sourced and grown tree stock; setting interim targets to monitor tree canopy cover increase; protecting habitats from pollution-emitting development.

Burwash Parish Council

Burwash Parish Council is in the final stages of developing a Neighbourhood Plan that has a strong focus on protecting the AONB, increasing biodiversity, reducing car journeys through the promotion of car sharing, development of new cycle paths, footpaths that are wheelchair friendly with access gates for large dogs with for example dog gates. We hope that bus shuttles could link the three Burwash villages with the local stations to link in with train timetables, especially at key commuter times. The Parish Council also plans to embed climate emergency actions into all strategies, promote wildflower meadow enhancement and tree planting.

Future plans include promotion of renewable energy sources and dark skies friendly lighting options for all new buildings in the parish and ensuring that all services providers used by the Council e.g. power, banking etc are all based on environmentally friendly companies.

Woodland Trust:

Add action points on protecting and restoring ancient woodland; support for UK sourced and grown tree stock; setting interim targets to monitor tree canopy cover increase; protecting habitats from pollution-emitting development.

We welcome this strategy in support of Rother District Council's goal to be carbon neutral by 2030, and in particular welcome the recognition of biodiversity as a key element of the Council's Environment Strategy and the engagement with the Woodland Trust's Big Climate Fightback.

And second, I would like to introduce a note of caution regarding the emphasis placed on the proposed action to double Rother district's tree cover by encouraging tree planting as part of a 'Big Climate Fightback'.

It is essential the final Environment Strategy and your recently launched initiative to increase tree planting within Rother district scrupulously guards against encouraging the planting of the wrong trees in the wrong places and the planting of trees for their own sake at the expense of other interests. This issue has been highlighted recently following a high profile mistake by Nestle and the Woodland Trust in Cumbria <https://www.bbc.co.uk/news/uk-england-cumbria-51587820> and this recent Sussex Wildlife Trust article may also be of interest - <https://bit.ly/32xYbA8>

Of course, trees and woodland are a much-loved and a key component of the landscape and one we fully recognize in the AONB Management Plan (see here: <https://bit.ly/36N15D5> pages 40 – 45). For thirty years we've promoted the value and importance of woodlands and their contribution to the rural economy, biodiversity, carbon capture, flood management etc. and we work with woodland owners and farmers to encourage appropriate woodland management.

Although a wish to plant trees to address climate change is understandable, tree planting is not always a desirable or a benign option. Our general position on large tree planting schemes in the already well-wooded High Weald is one of caution, particularly when the importance of other parts of the High Weald landscape is not recognized or valued (e.g. fields/grasslands).

We would be very happy to work with RDC so that the final Environment Strategy and your recent initiative to increase tree planting ensures the right trees are planted in the right places to improve biodiversity and help address climate change without adversely affecting landscape character or losing existing wildlife/habitat value and farmland or compromising the district's ability to produce food.

Dr Simon Forster, Consultant Ecologist and Resident

Tree Planting

It is stated that 82% of the Rother district falls within the High Weald AONB. The AONB is characterised by the existence of a medieval landscape that has remained largely unchanged of over 1000 years. This landscape comprises a patchwork of woodland, hedgerows and small meadows and, as stated in the draft document, currently has the highest density of woodland in the South East. It is this heterogeneous nature of the landscape that facilitates the existence of the diverse floral and faunal communities we currently enjoy.

The emphasis in the Draft Environmental Strategy on tree planting will be inappropriate for the majority of the AONB. Whilst planting trees to combat climate change is a popular policy that the public can become engaged in easily, the integrity the AONB landscape and the value of the existing grassland and meadow habitats must not be compromised by a well-intentioned but inappropriate actions. The selection of sites for tree planting must be undertaken with considerable care so as to avoid disrupting the heterogeneity of the countryside that is essential to maintain the existing biodiversity. I would recommend strongly that such decisions should be made in consultation with the High Weald AONB Advisory Unit and that 'private' tree planting projects within the AONB without consultation be discouraged.

Landscape Management

Given the high proportion of Rother District that is currently wooded, rather than promoting tree planting projects, in my opinion, it would be much better to encourage the maintenance and enhancement of existing woodland habitats. For example, the restoration of derelict coppice woodland would enhance new dense tree growth that would at least equal and probably exceed that of newly planted saplings. Furthermore, the harvesting of coppice woodland provides an economic product (the wood) and generates sequential periods of maximum tree growth and, hence, on-going maximum carbon fixing potential.

Environmental Health

In reference to partners required add: Organisations such as the Woodland Trust, Sussex Wildlife Trust and even Forestry Commission. See if you can get them on board and also market the scheme or help.

Rother Environmental Group

Tree Protection – biodiversity is about all forms of plant and animal life and the Council needs to recognise this in all its policies. Encouragement of planting of trees is fine, but protecting existing trees is essential now for the protection of biodiversity. Tree Preservation Order policy should be examined to ensure that more trees are statutorily protected and in any planning application, the Council needs to be particularly circumspect about granting permission which would result in the removal of trees and/or hedgerows. Consider in the forthcoming Local Plan review greater protection for existing trees and hedgerows. An audit of trees and hedgerows sited on land scheduled for development under the current DaSA plan should be undertaken, with planning approval withheld where developers have pre-emptively felled trees.

Sussex Wildlife Trust

6. Biodiversity

It is disappointing that the explanation of the Biodiversity priority actions is entirely focussed on trees. SWT agrees that trees and woodland are extremely valuable, providing multiple benefits for people and particularly in terms of mitigating and adapting to climate change. However, there must be an acknowledgement that woodland is not the only important and valuable habitat in Rother District. Many other habitats have value in their own right and in terms of contributing to carbon sequestration and climate mitigation, for example, coastal habitats, ancient meadows and wetlands are all important assets within the district. RDC should be looking at its existing natural capital assets and ways to enhance these as many will be in poor condition or very isolated.

Additionally given the high percentage of woodland cover in the district, tree planting may not be the most appropriate strategy. We are particularly concerned by the ambition to ‘double tree cover’ without any clear guidance on how this will be achieved in an environmentally sensitive way. Much more should be done to enhance the quality of the existing woodland and any tree planting should be done strategically, via a nature recovery network, to improve connectivity and resilience of existing assets.

If the council wants to continue with tree planting, we strongly urge it to adopt a policy of the right tree in the right place. Without this more harm could be done with trees being planted in inappropriate locations that harm biodiversity and reduce the natural functioning of the ecosystem. For further information on this we recommend the following blogs: <https://sussexwildlifetrust.org.uk/news/the-trouble-with-trees> and <https://sussexwildlifetrust.org.uk/news/tree-to-plant-or-not-to-plant-that-is-the-question>

The consensus is that in order to tackle the climate and biodiversity emergencies, we need to protect and restore our wild places. There is a huge variety of potential actions that can restore biodiversity and help to mitigate and adapt to climate change, ranging from restoring a whole river catchment to installing a single rain garden. We therefore urge RDC to commit to a nature recovery network in order to prioritise and focus activity.

Campaign for Rural England Sussex

6. Protecting biodiversity

The UK's wildlife continues to decline. Since the 1970s, there has been a 13% decline in average abundance across wildlife studied and the declines continue unabated. While the biodiversity crisis also has other causes, climate change is a significant contributor, so the two crises are two sides of the same coin, and we must address them together.

Rother should develop partnerships with all relevant organisations, public, private and community, to work together with the common task of biodiversity conservation and improvement. In particular, Rother should support, follow the work of and adopt the principles set out in the Sussex Natural Capital Investment Strategy, orchestrated by the Sussex Local Nature Partnership:

http://sussexlnp.org.uk/wp-content/uploads/2020/03/Natural-Capital-Investment-Strategy_Summary_Feb2020.pdf

Rother should undertake a range of programmes with those partners to manage and protect biodiversity within its natural areas including waterways, wetlands, coastal areas, woodlands and rural and urban roadsides.

Biodiversity is about all forms of plant and animal life and Rother needs to recognise this in all its policies. Encouragement of planting of trees is fine but that is for the longer-term future. Protecting the current trees we have is more capable of more immediate beneficial results for biodiversity, so the Tree Preservation Order policy should be examined to ensure that more trees are statutorily protected and in any planning application, Rother needs to be particularly circumspect about granting permission which would result in the removal of trees and/or hedgerows. It may consider in the forthcoming Local Plan review introduction as a policy, greater protection for existing trees and hedgerows.

....

As part of a Rother – wide Biodiversity Management Plan, there should be an overriding principle of native (to our area) species being preferred. Vegetation management should be controlled in the interests of biodiversity and this includes vegetation on stone and brickwork.

Rother should encourage parish and town councils to seek opportunities for small scale habitat creation that may be suitable in and around settlements including creating ponds, developing wildflower meadows and planting small areas of woodland and scrub.

PRIORITY: Biodiversity					
	<ul style="list-style-type: none"> Set up a 'meet the target' page on the RDC website which includes all reported tree planting and shows progress to 'doubling tree cover' in Rother 	2020		ESO	Residents, private sector businesses, all stakeholders

Consultation Responses:

Woodland Trust:

Add ... setting interim targets to monitor tree canopy cover increase

Environmental Health:

In reference to partners required add: The Parks team, highways - ESCC; private landowners.

All of the above [actions under biodiversity] equals good stuff. Is it possible to include in future Planning Policy, that an assessment for tree planting for each development (at least the Majors) must be undertaken? ie. strengthen tree planting through planning policy. Am sure there's a hook in the NPPF we could hang that policy.

Rother Environmental Group

Tree and Hedgerow Losses - if publicity is given to trees being planted in Rother, the same publicity needs to be given to trees and hedgerows being removed to provide a true net picture.

Education: It is important so that people are encouraged where possible in their gardens or allotments to encourage biodiversity. Raising awareness of biodiversity and encouraging or facilitating people to engage with and appreciate wildlife must be seen as an important tool in biodiversity conservation which Rother is able to provide. Giving opportunities for people to experience and understand more about wildlife in their local area can instil respect, remind them of how they value nature and lead to effective conservation. Raising awareness of biodiversity can be facilitated by organising wildlife-themed walks, bat walks, wildflower walks and

birdwatching or competitions, such as best wildlife-friendly estate, best garden for wildlife or a wildlife photography competition. Better still is providing opportunities for people to volunteer on a project, such as invasive plant species removal and tree planting. It is often the social benefits of such events that will attract people to get involved. The Council to provide the knowledge bank for people to engage with whichever voluntary organisation is playing its part in this aim.

Campaign for Rural England Sussex

Also, if publicity is given to trees being planted in Rother, the same publicity needs to be given to preventing trees and hedgerows being removed to provide a true net picture.

Education is also important so that people are encouraged where possible in their gardens or allotments to encourage biodiversity. Raising awareness of biodiversity and encouraging or facilitating people to engage with and appreciate wildlife must be seen as an important tool in biodiversity conservation which Rother is able to provide. Giving opportunities for people to experience and understand more about wildlife in their local area can instil respect, remind them of how they value nature and lead to effective conservation. Raising awareness of biodiversity can be facilitated by organising wildlife-themed walks, bat walks, wildflower walks and birdwatching or competitions, such as best wildlife-friendly estate, best garden for wildlife or a wildlife photography competition. Better still is providing opportunities for people to volunteer on a project, such as invasive plant species removal and tree planting. It is often the social benefits of such events that will attract people to get involved. Rother must provide the knowledge bank for people to engage with whichever voluntary organisation is playing its part in this aim, as well as supporting and encouraging those organisations in their work.

PRIORITY: Biodiversity				
	<ul style="list-style-type: none"> • Increase tree coverage throughout the district on council owned land 	Ongoing		ESO

Consultation Responses:

High Weald AONB Unit

We welcome the value the draft Environment Strategy has placed on trees. You have articulated very well the role of trees and the diverse range of direct and indirect benefits they provide - from visual quality, biodiversity, and flood management to renewable energy, sustainable materials, and mitigating the impacts of climate change.

However, Rother district specifically and the High Weald more generally is much more than just trees. New tree planting is not the only or even always the best way for Rother district to respond to the environmental and climate change emergency - there are other natural and integrated land management solutions. Given this, I would like to make two main points in response to the draft Strategy's emphasis on trees.

Bexhill Heritage

This should enable a further push to be made for more tree planting in the Town Centre, the street planting which has already been done is most welcome, more would be a further enhancement of the townscape. It should be extended to East Parade open space to relieve the somewhat forlorn appearance towards Galley Hill – a point we have previously made in response to the public realm consultation. There are species that will survive the harsh seaside environment.

Rother Environmental Group

Woodland - the figures concerning woodland cover are muddled. The figure for total woodland cover (9,751 ha) is taken from the National Inventory of Woodland and Trees 2000. The ancient woodland is taken from the revised Ancient Woodland Inventory (AWI) from 2010. The former is for parcels above 2 ha whereas the latter includes parcels from 0.1 ha. The original AWI did not include parcels less than 2 ha, these account for approximately 1,240 ha. At the same time mapping and other errors reduced the

ancient woodland above 2 ha by 780 ha resulting in a net gain of 460 ha to 8,055 ha. Some of the errors were misattribution (210 ha). Consequently, it is incorrect to give a figure for total woodland cover of 10,211 ha by adding 460 ha to the National Inventory figure of 9,751 ha. It would be useful to add the % cover in brackets after the figures in hectares.

xiii. Tree cover - given Rother District has one of the highest percentages of tree cover in the country a target to double tree cover is very ambitious. (Only 1,420 ha of woodland were planted in England in 2019). Perhaps some sub-goals on the way could be set e.g. the first stepping stone could be equal tree cover in England's most wooded county (Surrey with 23%), and then moving up the district wooded league table.

PRIORITY: Biodiversity					
	<ul style="list-style-type: none"> Reduce verge cutting and mowing; encourage wildflowers 	Ongoing		HoSH&C	ESCC

Consultation Responses:

Dr Simon Forster:

The Rother District includes some of the finest example of wild flower meadows in the UK and many more grassland sites that have the potential to be improved in terms of their biodiversity by varying land management methods at little or no cost to the landowners. I believe such actions should be discussed in the Environmental Strategy report.

The emphasis in the Draft Environmental Strategy on tree planting will be inappropriate for the majority of the AONB. Whilst planting trees to combat climate change is a popular policy that the public can become engaged in easily, the integrity the AONB landscape and the value of the existing grassland and meadow habitats must not be compromised by a well-intentioned but inappropriate actions. The selection of sites for tree planting must be undertaken with considerable care so as to avoid disrupting the heterogeneity of the countryside that is essential to maintain the existing biodiversity. I would recommend strongly that such decisions should be made in consultation with the High Weald AONB Advisory Unit and that 'private' tree planting projects within the AONB without consultation be discouraged.

Fairlight Parish Council

FPC are investigating the possibility of meadow/wildflowers for the grass verges in Fairlight. In addition, we hope to encourage residents to participate in this scheme.

Burwash Parish Council

The Parish Council also plans to embed climate emergency actions into all strategies, promote wildflower meadow enhancement and tree planting.

Rother Environmental Group

Local Focus: As part of a Rother-wide Biodiversity Management Plan, there should be an overriding principle of native (to our area) species being preferred. Vegetation management should be controlled in the interests of biodiversity and this includes vegetation on stone and brickwork.

- ix. Community Involvement – the Council should encourage parish and town councils to seek opportunities for small scale habitat creation that may be suitable in, and around, settlements, to include creating ponds, developing wildflower meadows and planting, small areas of woodland and scrub.
- x. Partnerships – the Council is to develop partnerships with all relevant organisations, public, private and community, to work together with the common task of biodiversity conservation.
- xi. Joint Working – the Council to undertake a range of programmes with those partners to manage and protect biodiversity within its natural areas including waterways, wetlands, coastal areas, woodlands and rural and urban roadsides.
- Xiv Verges - to expand and encourage local native tree planting schemes, working alongside and with the co-operation of residents to increase reforestation of urban areas.

Sussex Wildlife Trust

We support the action of reducing verge cutting and mowing to encourage wildflower. We must emphasise that it is essential that some cutting still occurs and that arisings are removed in order to reduce nutrient build up on verges. We recommend the Plantlife good practice guidance on this issue. https://www.plantlife.org.uk/application/files/3315/7063/5411/Managing_grassland_road_verges_Singles.pdf

Crowhurst Environment Group

[Add] Evidence of positive and effective best practice in supporting biodiversity and the recovery of wildlife.

PRIORITY: Biodiversity					
SUSTAINABLE SERVICES	Action	Timescale	Delivery Target	Lead Officer	
	<ul style="list-style-type: none"> Support homes facing medium/high risk of flooding and encouraging flood resilience/defence measures 	Ongoing		TBA	

Consultation Responses:

Environmental Health

Environment Agency/Sussex Wildlife Trust/Woodland trust/private owners of woods upstream/other private landowners - for natural ways to slow rain water. Such as building natural dams in woods/allowing flooding in strategic places etc.

Rother Environmental Group

Pevensey Levels - protect the 'jewel' on our doorstep – Pevensey Levels - relevant for planning applications: encroachment onto the Levels, damage to water courses flowing into the Levels, and potential damage from drain outflows.

Sussex Wildlife Trust

We support the action to support and encourage flood resilience, however we strongly encourage RDC to commit to using natural solutions where possible rather than hard engineering. Natural solutions can provide multiple benefits, including contributing to climate change mitigation, increasing biodiversity and providing recreational opportunities.

Campaign for Rural England Sussex

This action needs clarification: 'We will support homes facing medium/high risk of flooding and encouraging flood resilience/ defence measures. We will review our Strategic Flood Risk Assessment.'

To read: 'We will support existing homes facing medium/high risk of flooding and encouraging flood resilience/ defence measures. We will review our Strategic Flood Risk Assessment.'

PRIORITY: Biodiversity					
	<ul style="list-style-type: none"> Develop a pollinator and pesticide policy which will detail how the Council will maintain, protect and enhance key habitats over the long-term for the many species of insects that pollinate crops and wildflowers and commits the Council to avoiding pesticides whenever possible on its sites including parks, recreation grounds, children's play areas, sports fields, downland, cemeteries and nature reserves 	2020		HoSH&C	ESCC

Consultation Responses:

Environmental Health

In reference to partners required add: Sussex Wildlife Trust and other similar charities.

Rother Environmental Group

Pesticides – work with local farmers and encourage farmers to reduce use of pesticides.

Sussex Wildlife Trust

SWT strongly supports the production of a pollinator and pesticide policy.

PRIORITY: Construction and Existing Stock: Ensure the impact of development is not detrimental to the environment					
CLEAN GROWTH	Action	Timescale	Delivery Target	Lead Officer	Partners required
	<ul style="list-style-type: none"> Require homes build on council owned land to be Passivhaus or similar 	2020 – 2030		HoSAT&R	Private sector developers, registered providers

Consultation Responses:

Ticehurst Parish Council

- Existing old affordable housing standards concern TPC – especially the flats within the Springfield estate

Dr Simon Forster

Development and Construction

It is stated that the Rother District “is expected to accommodate significant housing growth over the coming years” and that the Council “will require homes built on council owned land to be Passivhaus or similar, wherever possible”. Why restrict this to council owned land? This statement seems to lack ambition espoused in the introduction to the report and the ‘Vision’ of the Council. Surely, through the planning procedures, the Council can strongly influence the development of new housing projects on privately owned land and insist upon Passivhaus standards for all new developments within the district. The application of low carbon energy technology such as ground source heating and, where the development does not impinge of the aesthetics of the High Weald AONB, roof-mounted solar panels should be mandatory if the stated carbon neutral targets are to be met.

Rother Environmental Group

- i. Key Priority: Success in this area [[Construction and Existing Stock, not Passivhaus] will be a key indicator for the future as to whether Rother has succeeded in its aim. The Local Plan Review must therefore take radical steps to ensure that all new buildings are carbon neutral.
- ii. Re-evaluation of aims: require homes built on council owned land to be Passivhaus or similar, wherever possible

Standards for Affordable Homes - when planning for affordable homes to rent and to buy follow the general principle to care for the poor and care for the earth. Follow the principle that affordable homes get the same or more solar panels, insulation etc. as any other housing.

Partnerships to Provide Affordable Homes - explore forging partnerships to increase supply of affordable homes for purchase and rent.

Campaign for Rural England Sussex

The action: 'We will require homes built on council owned land to be Passivhaus or similar, wherever possible' is too vague. The action should be 'We will require homes built on council owned land to be Passivhaus standard.'

PRIORITY: Construction and Existing Stock: Ensure the impact of development is not detrimental to the environment					
	<ul style="list-style-type: none"> Encourage low carbon and renewable energy development schemes, through the Local Plan review 	2021		HoSP&S	Private sector developers, registered providers

Consultation Responses:

Southern Gas Networks (SGN)

Among the toughest of challenges that will need to be overcome in Rother to meet net-zero will be decarbonising heat (i.e. the heating of buildings, water and industrial processes). Around a third of emissions in the area come from heating, and the majority of homes are heated by boilers that burn natural gas. Changing the gas that flows through our gas network in Rother to hydrogen (which burns without emitting direct greenhouse gases) could be key to achieving net zero in a way that is cost-effective and minimises disruption for customers.

We engaged closely with the development of the Tri-LEP energy strategy for the wider south east region. We welcome its findings that the injection of hydrogen into the gas network is an important part of the pathway to net zero heating. We are keen to engage with Rother District Council on the potential to deliver hydrogen alongside other sustainable energy solutions in Rother and how we can support this.

We welcome that the council highlights in the strategy that some of the changes required (this includes the introduction of hydrogen) are outside your direct control. We are keen to ensure such changes are still included given the potential to deliver the local carbon neutral target.

Sussex Wildlife Trust

7. Construction and Existing Buildings

SWT agrees that the Local Plan Review offers a big opportunity to encourage greener development. We urge the council to produce strong baseline evidence on the District's natural capital assets and green infrastructure network against which growth scenarios and

potential allocations can be assessed. Avoidance of impacts should be the priority, along with a commitment to a measurable net gains to biodiversity.

We therefore recommend that the third action is amended to:

‘We will avoid negative environmental impacts from new development in the District through introduction of specific planning policy’.

This is in line with the mitigation hierarchy embedded in the National Planning Policy Framework.

Transport Futures East Sussex

The function of RDC as ‘Planning Authority’ also has transport implications. This is recognised in the National Planning Policy Framework (NPPF) guidance (Promoting Sustainable Transport pp9-11). The anxiety for us is that despite this guidance and its clear aspirations, ‘car dependent’ developments are all too frequent within East Sussex and significantly in Wealden District. This impairs any efforts to reduce Co2 emissions and improve air quality, and deters walking and cycling.

We note that urban extensions of Bexhill, such as BX2/3 make positive references to walking and cycling, and also to ‘high frequency’ bus services. This is encouraging but we wonder if the words on the pages of policy documents will translate into high quality living spaces that meet the needs of 8 and 80 year olds (we think an essential goal). Since the development plan was first drawn up (2007) we have seen continued growth in rail patronage at local and main stations. Recent increases are quite remarkable: for Bexhill, Collington and Ore, respectively total numbers of rail journeys taken in 2018/19 (2017/18 in brackets) were 1,448,466 (1,327,850); 191,418 (168,370); 240,652 (173,896). The Glyne Gap station proposals were not cancelled but deferred in the ?2014 Public Inquiry and should be looked at afresh, alongside potential new bus services for BX2/3 and taking account of expected large growth in electric bike sales, and improving and new cycle infrastructure.

The reference to ‘limitations of the planning system’ applying mainly to new development are understood, but partnership working with, borough and county authorities as well as with bus and rail operators can bring about physical infrastructure to support ‘sustainable transport’/‘active travel’ links for both new and existing developments, both urban and rural, which would improve ‘quality of life’ for all.

We strongly believe that the ‘energy efficiency’ of new developments should be measured not only by energy consumption of properties but by the ‘transport impact’ of the developments at an ‘estate’ level over, say, 50 years. This would amplify and increase understanding of the value of ‘sustainable transport’ provision and help a shift towards such modes and away from ‘car dependency’. That would lead to a better outcome in efforts to achieve a ‘zero carbon’ result and high quality living spaces.

Suggest: Adopt ‘Transport for New Homes’ checklist against which to assess sustainability of a development through its propensity to include design features and measures to secure highest take-up of non-car modes. The checklist is attached. This is also relevant in a context of ‘energy demand scenarios’. Good estate design can reduce energy demand from the transport sector, the fastest growing source of CO2 emissions. ,

PRIORITY: Construction and Existing Stock: Ensure the impact of development is not detrimental to the environment					
	<ul style="list-style-type: none"> Mitigate the effects of new development in the District through introduction of specific planning policy 	2021		HoSP&S	Private sector developers, registered providers

Consultation Responses:

Ticehurst Parish Council

- TPC supports permitted development for disused buildings in appropriate manner
- Policy should include detail for listed buildings to assist reduction in carbon footprint for residents
- TPC suggests that carbon emissions statement should accompany planning applications.

Burwash Parish Council

Burwash Parish Council is in the final stages of developing a Neighbourhood Plan that has a strong focus on protecting the AONB, increasing biodiversity, reducing car journeys through the promotion of car sharing, development of new cycle paths, footpaths that are wheelchair friendly with access gates for large dogs with for example dog gates. We hope that bus shuttles could link the three Burwash villages with the local stations to link in with train timetables, especially at key commuter times. The Parish Council also plans to embed climate emergency actions into all strategies, promote wildflower meadow enhancement and tree planting.

Future plans include promotion of renewable energy sources and dark skies friendly lighting options for all new buildings in the parish and ensuring that all services providers used by the Council e.g. power, banking etc are all based on environmentally friendly companies.

Rother should be looking at ensuring that new housing options are developed on brownfield sites that are close to local facilities with transport options to reduce the number of car journeys in the parish. Any new builds in rural areas should be focused on the local communities and should be focused on affordable housing to ensure that local young people and young families are not forced to move away from where they were brought up and their families. Additionally smaller units should be developed so that older residents are able to stay in their local communities when they want to downsize.

Environmental Health Dept.

As the contaminated land officer for RDC, am wondering if we could strengthen the emphasis in planning policy for regeneration of brown field sites? Also, to encourage use of such sites, which are significantly more expensive to develop, explore if we can help financially? Is it for eg, possible to reduce planning fees significantly, if a site is brownfield compared to a greenfield site? If for residential, RDC would still then get council tax reserves? As brownfield sites will more likely be near town centres and local services, they are ultimately, more sustainable and this will have other benefits to communities.

Rother Environmental Group

Missed opportunity – the Council could have introduced more innovative land use policies when it created the recent DaSa. There is no positive encouragement for more local low carbon or renewable energy facilities. This to be rectified at the earliest opportunity.

Planning – incorporate the principle of net gain for biodiversity in any development, in line with the Government's proposed Environment Bill.

Ensure planning officers have the appropriate knowledge and skills, by providing biodiversity training. Set net gain targets as a condition to all planning approvals.

[Biodiversity] Enforcement : In the new Local Plan, Rother needs to improve upon DaSA Policy DEN 4. It should be capable of being more rigorously enforced as policy principles in the Rother Green Infrastructure Network, in particular the Conclusions and Implementation section, should be reviewed and updated. In the new Local Plan, Rother needs to improve upon DaSA Policy DEN 4. It should be capable of being more rigorously enforced as policy principles in the Rother Green Infrastructure Network, in particular the Conclusions and Implementation section, should be reviewed and updated.

iv For new build housing, UKGBC recommends advocating a minimum baseline, which should gradually be strengthened to deliver greater environmental and social outcomes.

Raise Standards: In the recent DaSA, opportunity was missed in certain areas to raise the standards higher, such as policies DRM 1, DRM 3, DHG 3, DEN 4 and DEN 7.

Extensions – the Council to insist that these too are low carbon, but proportionate and appropriate to the property.

Air Source heat pumps – the Council is to advocate use of heat pumps over gas fired or other fossil fuel heating systems.

Sussex Wildlife Trust

We therefore recommend that the third action is amended to:

‘We will avoid negative environmental impacts from new development in the District through introduction of specific planning policy’.

This is in line with the mitigation hierarchy embedded in the National Planning Policy Framework.

Campaign for Rural England Sussex

In the new Local Plan, Rother needs to improve upon DaSA Policy DEN 4: the ideas in it should be capable of being more rigorously enforced as policy, rather than being a ‘nice to have’. The principles in the Rother Green Infrastructure Network (https://www.rother.gov.uk/wp-content/uploads/2020/01/Green_Infrastructure_Background_Paper.pdf) in particular the Conclusions and Implementation section, must be reviewed and updated.

Success in this area will be a key indicator for the future as to whether Rother has succeeded in its aim. The Local Plan Review must therefore take radical steps to ensure that all new buildings are simply carbon neutral if both science and economics permit. The Government has not ruled out the ability for LPAs to go beyond building regulations when setting standards for energy efficiency, in

fact the committee for climate change has encouraged the government to allow LPAs to go beyond the Future Homes Standard. The declaration of a climate emergency would justify such an approach by the council.

One simple method would be to require that all new developments of whatever type are positioned to utilise the maximum solar gain. There have been Local Plan suggestions referred to in other responses to this consultation and they all need to be taken onboard.

In the recent DaSA, opportunity was missed in certain areas to raise the standards higher – please see policies DRM 1, DRM 3, DHG 3, DEN 4 and DEN 7.

One suggestion in the Action List needs to be fleshed out considerably:

‘We will seek to mitigate the environmental impact of new development ... through the Local Plan.’

It would have been more helpful to provide some guidelines at least. We have referred to the creation of small areas of biodiversity and the importance of Green Infrastructure elsewhere and these need to form part of such proposals.

Crowhurst Environment Group

[Add] Evidence of greater in depth building strategies for all new construction across Rother District rather than only council owned property. Evidence of working with universities, design and architectural practices, developers and builders with experience of high value environmental construction and projects to inform all new building and development projects.

PRIORITY: Construction and Existing Stock: Ensure the impact of development is not detrimental to the environment					
	<ul style="list-style-type: none"> Consider the introduction of a levy to support offsetting carbon impact of new developments 	2021		HoSP&S	Private sector developers, registered providers

Consultation Responses:

Rother Environmental Group

Council time frame for zero carbon homes is not ambitious, set clearer and more urgent targets. Guidance should also require modelling 'Whole life' carbon impacts, with a view to setting targets in relation to their introduction of their carbon offsetting levy.

PRIORITY: Construction and Existing Stock: Ensure the impact of development is not detrimental to the environment					
HEALTHY PLACES	Action	Timescale	Delivery Target	Lead Officer	Partners required
	<ul style="list-style-type: none"> Actively seek funding opportunities to support retrofitting existing stock throughout the district 	2020		ESO	

Consultation Responses:

Ticehurst Parish Council –

TPC would like RDC to consider reduction in rates – business and residential – for good, proven environmental practise.

Environmental Health

Maybe discuss this and work with Env Health's housing team? Could result in positive Env H outcomes, such as a reduction in excess cold in the Private rented sector. Maybe a carrot and stick approach again.

In reference to partners required add: Environmental Health - Housing team who would undertake enforcement for excess cold and damp etc (ultimately, energy inefficient homes). Might be able to point towards properties or areas to start such work.

Rother Environmental Group

Retrofitting Existing Housing Stock: Work should be compliant with PAS2035: Retrofitting Dwellings for Improved Energy Efficiency, so that high standards of design, installation and commissioning can be assured. Council to avail itself of national and international expertise.

PRIORITY: Construction and Existing Stock: Ensure the impact of development is not detrimental to the environment					
	<ul style="list-style-type: none">• Use of Community Infrastructure Levy (CIL) for schemes to offset carbon impact or towards cycling and walking infrastructure	2021		HoSP&S	

Consultation Responses:

None

PRIORITY: Construction and Existing Stock: Ensure the impact of development is not detrimental to the environment				
	<ul style="list-style-type: none"> • Ensure a focus on green spaces and tree planting for all new build schemes 	2021		HoSP&S

Consultation Responses:

Southern Gas Networks

We are interested in working with local authorities to support their journey towards decarbonisation and to highlight the role a low carbon gas network could have to play.

There are also opportunities in:

- developing community engagement where possible in increasing the amount of green spaces, pocket parks etc that would benefit the communities in which we operate; and

Rother Environmental Group

Allotment Areas – these should be included in developments of over 30 houses.

Sussex Wildlife Trust

We are also concerned about the focus on tree planting in the 7th action. All new build schemes should produce a net gain in biodiversity based on the habitat found on site and in the wider landscape. Whilst some tree planting may be suitable, this will not always be the case. We recommend this action is reworded as:

‘We will ensure a focus on green space provision and biodiversity gains for all new build schemes’.

Transport Futures East Sussex

Suggest after ‘tree planting’ (7th bullet point) insert ‘guided by principles of biodiversity’. Delete ‘where appropriate’.

PRIORITY: Construction and Existing Stock: Ensure the impact of development is not detrimental to the environment					
SUSTAINABLE SERVICES	Action	Timescale	Delivery Target	Lead Officer	Partners required
	<ul style="list-style-type: none"> Ensure all Council led developments are assessed for environmental impact and these assessments form part of the business case and decision making process 	2020		HoSAT&R	

Consultation Responses:

Burwash Parish Council

Also, Rother should ensure that all new developments should be powered by environmentally friendly heating systems and should follow dark sky protection planning guidance.

New Build Materials: the use of traditional building methods does not necessarily equate with adverse environmental performance. se of materials should be evidence based to consider life cycle costing, embodied energy and other factors.

xvii. Location and design of new buildings to take into account easy access, by foot, bicycle or public transport. Too much new development still heavily relies on car usage.

Sussex Wildlife Trust

Our construction

SWT very much supports council-led developments being assessed for environmental impact at an early stage, as avoidance of negative impacts through site choice and good design is always the priority. We would also like to see more positive action, with all council-led developments being assessed in terms of opportunities for implementation of natural solutions, green/blue infrastructure and biodiversity gains. Assessments should not just be about avoiding impacts, but also actively pursuing nature's recovery and natural solutions to climate change.

As already stated above, we would like the 8th action to be more positive with all Council led developments being assessed in terms of opportunities for implementation of natural solutions, green/blue infrastructure and biodiversity gains. We recommend the following wording:

'We will ensure all Council led developments are assessed for environmental impact and the potential to contribute to biodiversity gains and climate change mitigation and adaptation. Assessments will form part of the business case and decision making processes'.

Campaign for Rural England East Sussex

Negative reference is made in the Consultation document to development and 'traditional building methods.' Whilst it accepted that traditional building methods sometimes are not as quick as modern methods of construction (MMC), properly executed traditional methods produce buildings which are fully in keeping with the built heritage of which Rother should be proud, and certainly the use of brick and tile involves a low life time carbon footprint, as opposed to other building materials which require on-going carbon intensive maintenance. There is space in parts of Bexhill for MMC but in the rest of Rother which is almost all covered by the High Weald AONB, emphasis should be on traditional building materials, in keeping with the High Weald recently published Design Guide which should be adopted as Supplementary Planning Guidance by Rother.

PRIORITY: Construction and Existing Stock: Ensure the impact of development is not detrimental to the environment					
	<ul style="list-style-type: none"> • Procurement: Request environmental policies from tenderers for all contracts above £5,000 • Procurement: Ensure environmental issues are considered within the social value requirement within contracts worth above £15,000 	2021		TBA	East Sussex procurement hub partners

Consultation Responses:

Idverde:

Yes - idverde has an Environmental Policy. We also have an Ecology and Biodiversity Policy.

idverde currently take the following actions:

- We operate a companywide Environmental Aspects and Impacts Assessment as well as specific tailored versions for different contracts and distinct operational areas.
- We provide training on good working practices and tool box talks on specific environmental issues relating to biodiversity.
- We issue a Drivers Handbook to all drivers, which details good driving practices to reduce fuel usage and prevent pollution.
- We operate an Environmental Management System that is accredited to ISO 14001
- Our fleet department procures the cleanest and most efficient engine vehicles for use on our contracts such as those that are Euro 6 compliant and/or use hybrid or full electric technology. These are procured in line with client requirements and the client's budget.
- We have COSHH procedures for the use and handling of chemicals and hazardous materials
- When requested by our clients, we use pesticide free weed control techniques.
- We manage our waste and recycling using a waste strategy which includes the waste hierarchy

- We measure and monitor our fuel use.
- We utilise vehicle tracking technology to monitor the efficiency of our vehicles and machines
- We use route planning software to plan the most fuel efficient movements for our fleet of vehicles whilst delivering to the specified output.
- We have a biodiversity manual for managers which provides guidance and advice for managing our operations with minimal impact on biodiversity
- We offer a cycle to work scheme for all employees

Rother Environmental Group

The Council to Lead by Example: this theme has to permeate everything the Council does. We have made suggestions as to how the Council should run itself in other areas of this response, namely in section 2 for a green annual audit of suppliers, in section 4 with target setting internally for reductions in waste, monitoring and reducing use of light and heat, computers left on standby and in section 5 for improving insulation in its own estate. Information should be on RDC website.

Sussex Wildlife Trust

General comments on this part of the action plan...

8. Environmentally Friendly Council

We strongly support the council's commitment to becoming carbon neutral by 2030. We encourage RDC to consider how investment in nature can help to offset emissions that remain, once all efforts have been made to reduce them. As stated above, this should not be limited to tree planting. There are many habitats that can contribute significantly to carbon sequestration whilst also delivering other benefits such as flood resilience and recreational enjoyment.

Campaign for Rural England Sussex

Why not in relation Rother's own purchasing power, conduct a green audit of all its major suppliers and adjust future purchasing in favour of the suppliers showing the best green credentials, with perhaps a bias in favour of local? All contracts should contain specifications which minimise significant negative environmental impacts, linked to the Sustainable Procurement element of the council's Procurement Strategy, including for example, the materials used in building contracts/management, chemicals used in the grounds maintenance contract etc.

PRIORITY: Construction and Existing Stock: Ensure the impact of development is not detrimental to the environment					
	<ul style="list-style-type: none"> • Use local businesses where possible to reduce travelling requirements 	2021 Ongoing		TBA	East Sussex procurement hub partners

Consultation Responses:

Rother Environmental Group

Site Visit Vehicle - the Planning site visit bus to be electric.

Sussex Wildlife Trust

Our travel and transport

Any commitment on travel and transport should consider commuting as well as business travel. Additionally, RDC should consider the locations of events, meetings and public consultations to ensure that the public have sustainable transport options. Given the huge change in ways of working and particularly use of technology during the current pandemic, the opportunities these may have for reducing transport emissions should be reflected in the Strategy

PRIORITY: Environmentally Friendly Council					
SUSTAINABLE SERVICES	Action	Timescale	Delivery Target	Lead Officer	Partners required
	<ul style="list-style-type: none"> • Ensure environmental implications are considered in RDC reports, policies & strategies and decision making processes, by ensuring all managers are aware of the policy and able to demonstrate how they comply with it through the inclusion of an environment impact assessment summary on all committee reports. 	2020 – ongoing		EXECDIR	

Consultation Responses:

High Weald AONB:

iii. Given the draft Strategy’s commitment to consider the environmental implications in your decision-making process and to take a co-ordinated approach, RDC will need to ensure the AONB Management Plan has been fully considered in the preparation of the final Strategy. We would be able to assist RDC with this.

Rother Environmental Group

Planning Application Reports – make environmental impact assessment form part of all planning reports

Sussex Wildlife Trust

Comments on ‘An Environmentally Friendly Council’

An Environmentally Friendly Council – Our Commitment

Whilst we strongly support the council committing to being environmentally-friendly, again we feel that some of the language is quite limiting and unambitious. RDC does realise the scale of the issues we are all facing, so it must be proactive in pursuing positive opportunities and ambitious in its actions to combat the climate and biodiversity emergencies. We therefore recommend some amendments to the following commitments

Our decisions

SWT feels that just considering environmental implications is not sufficient to ensure the bold action needed to achieve carbon neutrality and nature's recovery. The natural environment needs to be considered from the earliest stages in the decision making process with a requirement for positive outcomes. The requirement for net gains to biodiversity for example needs to be embedded into decisions from the start.

[Remaining comments placed under relevant action below]

Campaign for Rural England Sussex

This theme has to permeate everything the Council does.

We have made suggestions as to how the Council should run itself in other areas of this response, namely in section 2 for a green annual audit of suppliers, in section 4 with target setting internally for reductions in waste, in section 5 for improving insulation in its own estate.

Preferential rates of car expenses should be paid to Council employees/councillors who use electric vehicles, or lower amounts for those who continue to use non-electric vehicles. Could the Planning site visit bus be electric?

Are there any Council buildings or land where renewable energy installations could be sited?

An environmental impact assessment should form part of all planning reports.

PRIORITY: Environmentally Friendly Council					
SUSTAINABLE SERVICES	• Increase options for flexible working	2020 – ongoing		EXEC DIR	

Environmental Health

Could this be stronger? We shall increase flexible working options for all Staff?

Rother Environmental Group

Home Working - set up a group to identify what lessons have been learned from the Covid 19 home working and produce a report on how those can be carried on post pandemic.

xi. Flexible Working - increase target for well-managed flexible working from 26% (this year).

Virtual Meetings - Council should increase virtual meetings and RDC working guidelines and training should be adapted to accommodate this change.

xiii. Virtual Enquiry Desk - develop this facility to discourage unnecessary travel.

Campaign for Rural England Sussex

Rother should set up a group to identify what lessons have been learned from the Covid 19 initiated home working and produce a report on how those beneficial experiences can be carried through into on-going normal ways of performing Council business. This may then go to reassess the Council's requirements for buildings and the energy costs associated therewith.

PRIORITY: Environmentally Friendly Council					
	<ul style="list-style-type: none"> Develop an officer working group or 'Green Team' of 'climate champions' within the organisation to take forward a 'culture shift' within the organisation; and encourage other organisations and local businesses to do the same 	2020		ESO	Private and public sector organisations

Consultation Responses:

Sussex Wildlife Trust

Our workforce

We strongly support a commitment to increasing awareness and good environmental behaviour in the workforce. This should include actively encouraging a connection with nature as there is a proven connection between access to nature and wellbeing. There are many community based initiatives that could be promoted to the workforce such as 30 Day Wild, the Big Butterfly Count and the Big Garden Bird Watch. We also recommend signposting green spaces to staff and promoting daily use of these. The council should also commit to ensuring that all departments have a direct responsibility to enhancing nature through their daily actions and projects.

<https://action.wildlifetrusts.org/page/57739/petition/1>

<https://www.bigbutterflycount.org/>

<https://www.rspb.org.uk/get-involved/activities/birdwatch/>

[The following are general comments about the monitoring and review of the Environment Strategy and are placed here because monitoring and review of this strategy might be part of the climate champions' role.]

Monitoring and Review

Whilst we welcome the production of this Environment Strategy and Action Plan there appears to be no delivery targets listed within the delivery plan. Without this it will be very difficult to monitor progress in a consistent way.

Given the short timeline to achieve net zero and the fast pace of change in terms of climate initiatives and technology, we support an annual review of the strategy. There should also be an alert system whereby a larger review can occur if it is clear that the council is

off track to achieve net zero. For example, RDC need to be transparent about its emissions every year so that people can see where reductions have been made and where there might be issues.

Campaign for Rural England Sussex

Rother could create an incentive scheme for all employees to reward new green implementable ideas in the Council's operations.

PRIORITY: Environmentally Friendly Council					
	<ul style="list-style-type: none"> Share expertise through the 'Green Teams' with other councils, public bodies and local businesses 	Ongoing		ESO	Private and public sector organisations

Consultation Responses:

Idverde:

In the next five to seven years idverde will be:

- Evaluating how our colleagues travel to work in order to promote sustainable travel
- Improving how we manage and reduce our waste including plastic use and recycling
- Developing a biodiversity impact assessment tool for all idverde operational teams to utilise when undertaking their work
- Auditing the sustainability of our supply chain with a view to reducing negative impacts on the environment
- Evaluating our resource consumption and identifying where we can reduce our negative impacts
- Addressing our efficiency where using water
- Investing in new greener technology such as electrical equipment, machines and vehicles

Whatlington Parish Council:

The council [WPC] does not own any buildings so the only impact is personal use, which for councillors would be computers and printers.

Rother Environmental Group

Local Partnerships - work with Parishes and Town Councils to ensure they have environmental policies in place in line with the district's aim to be carbon neutral by 2030.

iii. Green Team Publicity - publicly share the progress of the newly appointed Green Teams.

Crowhurst Environmental Group

Currently, the policy discusses resources and actions for Rother District council reductions in its practices and property. We would like to see wider support and leadership by Rother District Council, to provide a co-ordinated, well resourced and effective response across all parishes and towns, taking an active partnership approach rather than one that is top-down. Seedcorn grants locally to encourage local projects and actions prioritising projects that address environmental impacts and sustainable outcomes.

PRIORITY: Environmentally Friendly Council					
	• Undertake a review of existing office accommodation to ensure the Council is meeting its carbon neutral commitment	2020		ESO	

Consultation Responses:

Environmental Health:

And provide resources for actions to ensure the Council meets its C N commitment?

Rother Environmental Group

Energy Plants: assess Council buildings or land for siting of renewable energy plants.

Employees mode of transport - promote RDC staff to walk or cycle to local visits and meetings. Promote car pooling, using electric vehicles.

viii. Bicycle Facilities - provide covered, secure storage for bicycles at all council facilities for employers and adequate provision for visitors.

ix. Car Expense Rates - preferential rates of car expenses should be paid to Council employees/councillors who use electric vehicles, or lower amounts for those who continue to use non-electric vehicles.

Sussex Wildlife Trust

Our estate

SWT approves of retrofitting council assets, however this commitment appears to only relate to the built estate. Assuming that Rother also has green and blue assets there needs to be a commitment to improving the quality of these assets in order to achieve multiple benefits. We recommend that an audit is conducted, perhaps as part of any Green Infrastructure work for the local plan review. This should highlight existing assets and where enhancements can be made in terms of connectivity and functionality.

Campaign for Rural England Sussex

The action for council office accommodation is also too vague, what standards are referred to? This needs to be clear. For example, is this in relation to energy and water efficiency? What level is the target?

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Many of the actions within the Strategy could offer cost savings. For example, if the council decided to cut energy and water consumption from all buildings by 10% by 2022 then this would create a cost saving which could be harnessed and utilised for other measures. Salix (<https://www.salixfinance.co.uk/>) and other funding schemes should be investigated.

How does the data review link to the action plan? Should there not be targets in the action plan derived from the data? For example - energy consumption from council buildings – will this be reduced? By how much? What will the carbon saving be?