

Rother District Council

Report to: Cabinet

Date: 27 July 2020

Title: Consultation Report – Draft Rother District Council Environment Strategy

Report of: Ben Hook – Head of Service, Acquisitions, Transformation and Regeneration

Cabinet Member: Councillor Field

Ward(s): All

Purpose of Report: To report the results of the public consultation for the draft Environment Strategy, and the recommendations of the Climate Change Steering Group

Officer

Recommendation(s): **Recommendation to COUNCIL:**

That the Rother Environment Strategy 2020-2030 be approved and adopted, subject to the inclusion of the items listed in paragraphs 14 and 15 of the report, identified through the consultation process and recommended by the Climate Change Steering Group.

Introduction

1. At its meeting on 16 September 2019 (Minute C19/38 refers), full Council agreed the following resolution to:
 - i. Declare a 'climate emergency'.
 - ii. Review and update urgently Rother District Council's current carbon strategy.
 - iii. Pledge to do what is within our powers, to make Rother District carbon neutral by 2030, taking into account both production and consumption emissions.
 - iv. Call on the Government to provide any additional powers and resources necessary for Rother District to achieve the target of becoming carbon neutral by 2030, and to implement best practice methods to limit global warming to 1.5°C.
 - v. Request that Cabinet establishes a Steering Group to report to full Council within six months with an Action Plan, outlining how the Council will address this emergency. The Carbon Neutral 2030 Action Plan will detail the leadership role Rother District will take in promoting community, public, business and other Council partnerships to achieve this commitment throughout the District. The Action Plan will also outline adequate staff time and resources to undertake the actions to achieve the target.

- vi. To investigate all possible sources of external funding and match funding to support this commitment.
 - vii. Identify citizens across Rother who are climate champions for their communities and to use them to inform on ideas to implement locally.
 - viii. Investigate what Rother District Council can do to minimise the emission of gases which adversely affect climate change even more than CO2.
2. This declaration led to the development of the draft Rother Environment Strategy and Action Plan which was approved for public consultation by Cabinet in February 2020 (Minute CB19/96 refers).

The Consultation

3. The Consultation was open for 12 weeks starting on 25 February 2020 and ended at 5pm on Friday 18 May 2020.
4. The Consultation Plan identified that the following groups would likely be affected, positively or negatively by the Environment Strategy and might wish to make comment or propose amendments. The main target groups for this consultation were:
- i. Residents.
 - ii. Businesses operating in Rother and representative business groups.
 - iii. Transport companies and vehicle suppliers.
 - iv. Utility companies – electricity, gas, water.
 - v. Public sector organisations: Police, Fire & Rescue, East Sussex County Council, NHS CCG and health sector, East Sussex Local Authorities.
 - vi. Voluntary groups and charities operating in Rother.
 - vii. Environmental groups and active transport groups, walking and cycling groups.
 - viii. Schools, colleges and young people.
 - ix. Housing associations and other housing providers.
 - x. National Farmers Union (NFU).
 - xi. Contractors and Service Level Agreement partners with Rother District Council.
 - xii. All Rother Parish and Town Councils.
 - xiii. Rother District Council - Internal departments and teams: Environmental Health, Strategy and Planning, Regeneration, Affordable Housing Development, Finance, Waste and Recycling and Grounds Maintenance.
5. A general invitation to consult residents, visitors, service users and businesses was made via:
- i. My Alerts to 17,428 households (over a third of all Rother households).
 - ii. Media release on launch.
 - iii. Social media notifications on the Council's Facebook and Twitter accounts.
 - iv. The Council's website.
 - v. Posters were made available for display.

A launch event as well as consultation exhibitions were planned but they were not able to proceed due to control measures introduced during the COVID-19 outbreak.

6. In addition to this, a direct invitation to consult was sent to a number of key businesses, charities, public bodies, organisations and other groups. A list of these can be found at Appendix A.

The Response

7. 108 responses were received from local residents through the online survey. A further seven respondents submitted their response by email along with one posted letter. This means we had a total of 116 responses from the public.
8. 19 responses were also received from the list of identified organisations giving a total of 135 responses.
9. The ability to promote the draft strategy was hindered by the COVID-19 measures and whilst this return is lower than would have been expected for a consultation of this prominence, the quality of the response has generally been good.

The Results

10. The draft Environment Strategy was well received by those who responded, with little in the way of criticism. A number of comments were centred on the action plan and the lack of specific actions. However, it is recognised that the action plan is 'high level' at this stage and will be bolstered by the development of a more comprehensive programme of projects and interventions once adopted.
11. From the consultation results there were 10 suggested recommendations that were presented to the Climate Change Steering Group to consider (comments in relation to these recommendations are provided at Appendix B). These were:
 - a) Light Pollution and Dark Skies.
 - b) Supply Chain.
 - c) Reduction in Business Rates and Council Tax for Good Environmental Practice.
 - d) Review strategy again due to environmental effects of social distancing, new Government policy post COVID-19 etc.
 - e) Add References to the High Weald Management Plan.
 - f) Address Ecological Collapse and Biodiversity Crisis.
 - g) Public Transport.
 - h) Include Farmland and the Working Countryside.
 - i) Hydrogen and Biomethane.
 - j) Vehicle Noise.

Climate Change Steering Group

12. The results of the consultation were considered by the Climate Change Steering Group on 2 July 2020. Members were also provided with two supplementary documents. Supplementary Document 1 was the full, unabridged responses from those organisations that submitted comments. Supplementary Document 2 was all of the responses provided by residents organised by the order of questions in the consultation questionnaire. These documents are available on request.

13. Following a full debate on the 10 additional recommendations for inclusion, the Steering Group have recommended to Cabinet to include the following items into the strategy before it is sent to Council for approval:

To be included in the Strategy and Action plan:

- Supply Chains – to ensure that procurement assessment gives greater weight to the environmental impact of the companies with which the Council contracts, including assessments of their supply chains
- Public Transport – To include activity that will improve the standard, environmental impact and frequency of Public Transport throughout the District as well as promoting its use amongst residents.

To be referred to in the strategy but not included in the action plan at this stage:

- Light Pollution and Dark Skies – to be addressed initially in the Local Plan review
- References to the High Weald Management Plan - to be addressed initially in the Local Plan review
- Address Ecological Collapse and Biodiversity Crisis - to be addressed initially in the Local Plan review
- Include Farmland and the Working Countryside - to be addressed initially in the Local Plan review
- Vehicle Noise – To be reviewed again at a later date

14. Members of the Steering Group recommended that subsequent to the consultation, the following recommendations be kept out of the strategy at this time:

- Reduction in Business Rates and Council Tax for Good Environmental Practice – a scheme such as this would be expensive and unworkable.
- Review strategy again due to environmental effects of social distancing, new Government policy post COVID-19 etc. – The strategy will remain a live document and reviewed regularly. The COVID-19 impacts will initially be addressed through the Economic Recovery Steering Group who should ensure that actions within the Economic Recovery Plan are compliant with and contribute towards the ambitions of the Environment Strategy.
- Hydrogen and Biomethane – Elements of this are already being introduced through proposed changes to building regulations. Also, further advancements through research and development are required in this field to make a significant impact.

15. Those recommendations that are not included in the action plan at this point will continue to be considered for inclusion in future years once delivery of the strategy is underway.

Conclusion

16. Cabinet should consider the responses received through the consultation exercise. With consideration for the recommendations of the Steering Group, they should decide which, if any, of the additional recommendations in Appendix B they would like to see included into the Environment Strategy.

17. The Strategy will then be updated in such a way as to include these items before being recommended for adoption at Full Council.

Implications

Financial Implications

18. A revenue budget has been approved for the delivery of the Environment Strategy and the appointment of the Environment and Policy Manager. There will likely be need for further expenditure as a programme of activity is developed, in order to meet the Council's target of a 'Carbon Neutral District' by 2030.

Human Resources Implications

19. Delivering on this Strategy will draw on resources from across the organisation

Environmental Implications

20. Adoption of this strategy is a key step in furthering the activity required to reduce carbon emissions in the District. This strategy aims to improve the environment through the lowering the emission of carbon and other harmful particulates.

Sustainability Implications

21. Because this strategy will impact on all areas of business it is likely to have both positive and negative impacts on organisational sustainability. This will be drawn out more as the programme of activity is developed.

Consultation Implications

22. This strategy will require regular updating as delivery progresses and the national policy landscape changes. These updates will require consultation.

Other Implications	Applies?	Other Implications	Applies?
Human Rights	No	Equalities and Diversity	No
Crime and Disorder	No	Consultation	Yes
Environmental	Yes	Access to Information	No
Sustainability	Yes	Exempt from publication	No
Risk Management	No		
Executive Director:	Dr Anthony Leonard		
Proper Officer:	Malcolm Johnson, Head of Paid Service		
Report Contact Officer:	Ben Hook – Head of Service, ATR		
e-mail address:	Ben.hook@rother.gov.uk		
Appendices:	A. Direct Consultation Invitation List B. Recommendations for Inclusion		
Relevant Previous Minutes:	CB19/96		
Reference Documents:	Rother District Council Draft Environment Strategy Supplementary Document 1 – Organisational Responses Supplementary Document 2 – Resident Responses		

DIRECT CONSULTATION INVITATION LIST

Battle & District Chamber of Commerce
 Battle Abbey Advisory Group
 Bexhill Chamber of Commerce & Tourism, Bexhill Town Team
 Bovis Homes, BT Payphones, BT: Redcare and Payphones HLC
 BT: Payphones, De Etchingam CIC, De La Warr Pavilion
 Dyer & Hobbis, GT Railway, Hastings Direct
 Little Common and Cooden Business Association
 Locate East Sussex, Millwood Designer Homes, National Grid
 Network Rail, Renown Buses, Rye Chamber of Commerce
 Rye Partnership, Sea Change Sussex
 South East Local Enterprise Partnership, South East Water
 Southeastern Railway, Southern Gas Networks
 Southern Water Planning Policy, Stagecoach Bus
 Sussex Strategic Business Board, UK Power Networks
 Wheel Farm Business Park, Hastings & Rother Credit Union Ltd
 Bexhill Jobcentre Plus, Community Links (Hastings & Marsham Area)
 East Sussex Better Together, ESBT (Housing Sub Group)
 East Sussex County Council
 East Sussex County Council (Adult Social Care & Health), East Sussex County Council ASC Mental Health Services, East Sussex County Council Drug & Alcohol Commissioning, East Sussex County Council Mental Health, East Sussex County Council Social Care
 East Sussex Fire & Rescue Service
 East Sussex NHS Partnership Trust, Environment Agency
 Friends, Families, Travellers, Hastings Borough Council
 Highways England, Homes England, IFH Hastings GP Federation
 Lewes District Council and Eastbourne Borough Council
 NHS Hastings & Rother CCG, One You East Sussex
 Rother Association of Local Councils, Sussex Police
 High Weald AONB Unit, National Probation Service, 1066 Cycle Club
 Action in rural Sussex, Active Sussex, Alzheimers Society
 Association of Carers, Autism Sussex, Battle & District Riding Club
 Battle & Villages Lions Club, Battle Area Community Transport
 Battle Ramblers, Beautiful Battle, Bexhill 100
 Bexhill Caring Community, Bexhill Charter Centre
 Bexhill Community Bus, Bexhill Dementia Action Alliance
 Bexhill Diabetic Group, Bexhill Foodbank, Bexhill Heritage
 Bexhill Homelessness Unity Group (HUG)
 Bexhill in Bloom, Bexhill Islamic Association, Bexhill Lions Club
 Bexhill Old Town Preservation Society
 Bexhill Rail Action Group (BRAG)
 Bexhill Ramblers Association, Bexhill Sea Angling Club
 Bexhill Street Pastors, Bexhill Talking Newspaper
 Bexhill Youth Council
 Campaign for Better Transport East Sussex (now Transport Futures)
 Care for the Carers, Christians Against Poverty
 Churches Together in Bexhill
 Community Links (Hastings & Marsham Area)
 Disabled Motoring UK, East Sussex Age UK
 East Sussex Association of the Blind & Partially Sighted People
 East Sussex Better Together

East Sussex Group of Advance Motorists
East Sussex Hearing Resource Centre
East Sussex Recovery Alliance
Elder Abuse Recovery Service (EARS) East Sussex
Energise East Sussex, FSN (charity)
Guestling & Pett Community Friends Scheme
Hastings & Bexhill Mencap Society
Hastings & District Interfaith Forum
Hastings & Rother Disability Forum
Hastings & East Sussex Natural History Society
Hastings & Rother Furniture Service
Hastings & Rother Mediation Service
Hastings & Rother Rainbow Alliance, Hastings & Rother Samaritans
Hastings & Rother Voluntary Association (Blind)
Hastings Advice & Representation Centre
Hastings Sustainable Transport Forum, HATRIC
Health Watch East Sussex, Heart of Sidley Project, Historic England, Home Works,
Homecall Rother, Iden Field Trotters
Marshlink Action Group, Millwood Designer Homes
National Grid, Natural England, Northiam Conservation Society
Northiam Footpaths Group, One You East Sussex
Rother District Citizens Advice Bureau, Rother Environmental Group
Rother Neighbourhood Watch Scheme, Rother Race Action Forum
Rother Ramblers, Rother Seniors Forum, Rother Voluntary Action
Rye Conservation Society, Rye Dementia Action Alliance
Rye Harbour Nature Reserve, Rye Lions Club, Rye Runners
Seaview, Sidley Community Association, Sompriti
SSAFA Forces Help, St John Homeless Service, The Bexhill Hive
The Pelham CIO, The Snowflake Trust Ltd
Tilling Green Residents Association
Together Hastings Resource Centre
YMCA DownsLink Group, 1066 Country Campaign, Beautiful Battle
Bexhill in Bloom, Bexhill Old Town Preservation Society
Environment Agency
Hastings & East Sussex Natural History Society
Hastings Sustainable Transport Forum, High Weald AONB Unit
Northiam Conservation Society, Rye Harbour Nature Reserve
Sussex Heritage Trust, Bexhill College, Bexhill High School
Claverham Community College, East Sussex College Hastings
Bovis Homes, Brighton Housing Trust, Egerton House
Hastoe Group (social landlord), Homes England
Millwood Designer Homes, Optivo (social landlord)
Orbit Homes (social landlord), Persimmon Homes
Sanctuary Supported Living, Southdown Housing
Southdown/Home Works, NFU – National Farmers Union
Freedom Leisure (contractor to RDC), Biffa (contractor to RDC)
idverde (contractor to RDC), SHS (contractor to RDC), All Rother Parish and Town
Councils

RECOMMENDATIONS FOR INCLUSION

a) Light Pollution and Dark Skies

- i. **High Weald AONB Unit:** Whilst this document is called an 'Environmental Strategy' its focus is on addressing climate change. Whilst this is understandable in the circumstances, it means that many aspects of the environment are not addressed – for example the need to protect our dark skies so people can appreciate the stars and wildlife is not harmed by light pollution.
- ii. **Whatlington Parish Council:** Rother does not have a policy for intrusive lighting, which for rural areas that Rother covers is important for them and the environment. Rother need to have a policy. We will continue as at present highlighting on planning application any light intrusion. As we are a country parish with no streetlights it is very important to us that this is controlled.
- iii. **Burwash Parish Council:** A key thing that has not been included in the action plan is the protection of the dark skies. The area around Burwash is fortunate to be in an area with dark skies. Local groups have been working with the High Weald AONB unit to educate people about the benefits of dark skies and to try to maintain them as they bring enormous benefits both to wildlife and to tourism across the region. The action plan should include ways that Rother plan to reduce light pollution, as well as other forms of pollution and tree planting moving forward. Also, Rother should ensure that all new developments ... should follow dark sky protection planning guidance.
- iv. **Rother Environmental Group:** Dark Skies – the Council to consider the need for implementing a dark skies policy to reduce light pollution. There are local initiatives in this respect already in places like Burwash and a groundswell of opinion locally in favour elsewhere.
- v. **Campaign for Rural England Sussex:** Rother should consider the sense in implementing a dark skies policy to reduce light pollution. There are local initiatives in this respect already in places like Burwash and a groundswell of opinion locally in favour elsewhere. Research by CPRE (<https://www.nightblight.cpre.org.uk/>) shows that parts of Rother are exceptionally dark at night.
- vi. This suggestion was supported by rural residents as well.

b) Supply Chain

- i. Idverde: Although supply chain is mentioned with regard to energy and water, it is not considered in any broader sense. idverde itself will be auditing the sustainability of its supply chain which is in excess of a thousand suppliers; each with their own environmental impact. Knowing which of these are having the most negative impact will help us to make improvements in how we procure products and services that minimise impact on the environment. Maybe this is something the Council could consider.

c) Reduction in Business Rates and Council Tax for Good Environmental Practice

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

d) **Review strategy again due to environmental effects of social distancing, new Government policy post COVID-19 etc.**

i. **Sussex Wildlife Trust – Conclusion**

At the time of writing this response, the global and national economy is being severely impacted by the Covid-19 pandemic. We urge RDC to acknowledge this issue and its ramifications seriously when considering the progress and suitability of the Strategy currently proposed. This is a pivotal time for the economy and the environment and there is a real opportunity to direct the district in a green recovery rather than the damaging behaviours of the past. Whilst we acknowledge the possible resource constraints, we urge RDC to be ambitious in their Environment Strategy and push for nature's recovery for the benefit of all the residents of the district.

ii. This suggestion was also supported by residents, particularly in the latter half of the consultation period.

e) **Add References to the High Weald Management Plan**

i. **High Weald AONB:** The draft Strategy notes that over 82% of Rother District falls within the High Weald AONB and although RDC has formally adopted the statutory AONB Management Plan as your policy for the management of the AONB, there is no reference to the management plan in the main text of the Strategy or its delivery plan. The High Weald AONB Management Plan is the single most important document for the High Weald. It provides a useful unifying framework for addressing the major issues that face us today from food and energy security to housing provision, biodiversity, climate change resilience and the transition to a low carbon economy (see here: <http://www.highweald.org/high-weald-aonb-management-plan.html>). 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.

ii. **Sussex Wildlife Trust:** We are disappointed that the Strategy does not reference the statutory High Weald AONB Management Plan which RDC has signed up to. Given that 80% of the district is within the AONB the High Weald Unit should be a key partner for the council.

iii. **Dr Simon Forster:** Throughout the Draft Environmental Report document, there is an emphasis on collaboration with other stakeholders. This is entirely correct and necessary if the targets and ambitions of the report are to be met. Yet, despite the fact that 82 % of the area is within the High Weald AONB, there is no reference to consultation or collaboration with the High Weald AONB Advisory Unit. If mining and enhancing the existing landscape is an essential aspect of the 'Biodiversity' scope, the High Weald AONB Advisory Unit should be a key consultee and the District Council should utilise their expertise and work collaboratively with the Unit to achieve the goals common to both parties.

iv. **Transport Futures East Sussex:** From the strategy *'The Designated Landscapes Review (Julian Glover, September 2019) recommends changes in governance of the National Parks and Areas of Outstanding Natural Beauty (AONBs). Among these are the establishment of a new 'National Landscapes Service' (NLS) to bring National Parks and AONBs together (44 all told).*

- v. *The new NLS should ‘represent the 44 bodies with a single strong voice to Whitehall making ambitious offers to the nation for example on access and recreation, transport, health, education and nature as well as advocating on their behalf.’*
- vi. *The AONBs would receive double the current levels of funding and would ‘have a greater voice on development’. Whatever recommendations are eventually adopted, RDC will hopefully be in a better position to influence greater adoption of sustainable practices in line with its recommended ‘Actions’ at ‘3’ (Air Quality).’*
- vii. We [Transport Futures East Sussex] of course understand the recommendations of the Review described have not yet been adopted but it would be wise to anticipate opportunities that may arise at such time as decisions are made. In our view, the AONB is not able to be sufficiently proactive and has limited objectives.
- viii. **Crowhurst Environment Group** [Add] Evidence that reflects policies, overall aims and goals developed by the High Weald AONB Unit.

f) Address Ecological Collapse and Biodiversity Crisis

- i. **High Weald AONB Unit:** Without wanting to detract from the urgent need to address climate change, I would also suggest RDC considers ecological collapse as a connected issue and act to tackle this with actions that would also help address climate change – the two issues are inseparable. Many of the AONB Management Plan’s actions directly or indirectly look to address climate change and ecological collapse and a firm link between the AONB Management Plan and the Environment Strategy would help inform the Strategy and guide the environmental management of Rother District. Where residents, businesses, and visitors engage with your services, the AONB Management Plan can also be used to support them in their efforts to meet and support your Environment Strategy – the Plan and the Strategy should work in tandem.
- ii. **Sussex Wildlife Trust:** SWT agrees with the sentiment and explanation within the background section, however given this is an Environment Strategy, we feel there should be reference to wider issues including the Biodiversity Crisis¹. Whilst we agree that many solutions provide additional benefits including enhancing biodiversity RDC should be actively working to recover nature in the district. This will benefit the district directly and should also contribute to mitigating and adapting to climate change. There should also be a clear commitment to using natural solutions to climate change, rather than relying on technological advances. Natural solutions involve working with and enhancing nature to help address societal challenges such as climate change. Healthy natural habitats store huge amounts of green and blue carbon, and we rely on natural (ecosystem) services to create human health and wellbeing. So natural solutions can play an important role in helping to limit the effects of harmful greenhouse gas emissions, and helping humans to create healthy environments where both we and nature thrive.

SWT would like to see an Environment Strategy that prioritises action that will have a positive impact on the environment and help the district become carbon neutral by 2030. A strategy that simply aims to reduce impact on an already struggling environment is not ambitious enough.

In particular, SWT is pleased to see biodiversity listed as one of RDC's eight priority areas. However, simply 'protecting biodiversity' is not sufficient. RDC must be acting to restore biodiversity through the creation of a Nature Recovery Network as set out in the Defra 25 Year Environment Plan and the draft Environment Act. Priority are 6 should read 'Restoring biodiversity'. There should also be an acknowledgement that a healthy functioning environment underpins many of the other Action Plan priorities such as a green economy or improving air quality.

It is very positive that RDC have undertaken a data review, however this seems to be quite limited in its scope. In particular it is disappointing that no data has been gathered in relation to biodiversity in terms of the district as a whole, or the council's own assets.

In order to restore biodiversity and create the nature recovery network necessary for a district that is resilient to climate change, RDC will need to assess the current extent and quality of the district's ecological network and natural capital assets. Evidence required for the Local Plan, as noted in the Strategic Context section of this strategy, could be helpful in this. However, looking at this list it is likely that this information will need to be updated for the Local Plan review.

- iii. **Rother Environmental Group:** As a general comment on the Action Plan Priorities, we feel there is a lack of clarity on what the priorities are and how they relate to one another. We think the primary focus ought to be on climate change, as identified in the chapters on the Background and Strategic Context. This said, these do not give enough prominence to the ecological crisis, and we think stronger actions to address the loss of biodiversity are needed too. Reference: The UN Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES). Amongst other data it states that up to 1 million species are threatened with extinction, many within decades <https://www.un.org/sustainabledevelopment/blog/2019/05/nature-declineunprecedented-report/>
- iv. Some public respondents suggested specific actions in relation to improving biodiversity, see the next section.

g) Public Transport

- i. **Burwash Parish Council:** Burwash Parish Council is in the final stages of developing a Neighbourhood Plan.... 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.... 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.
- ii. **Rother Environment Group:** Reducing Car Use -much of RDC is rural with very poor public transport. The Council to initiate innovative partnerships to address this challenge for example with Royal Mail, community buses, school buses (state and private) and promote car sharing and pools.
- iii. **Transport Futures East Sussex:** In smaller, rural developments, such as at Etchingam, Robertsbridge and Burwash, we note the fragility of local bus services, but also their unrecognised potential, along with rail services, to aid a

recovery of the tourist economy of Rother and East Sussex in general while offering useful transport links to residents. The bus is a proven ally in tackling rural isolation and also retaining young populations in and around our villages and small towns including when tied in with rail services.

Rother District Council should make its voice heard by the transport authority – ESCC – and also Transport for The South East (TFSE) in strengthening such provision. Together with possible changes in governance and funding for the AONB (see below), the ‘Green Economy’ by definition needs ‘sustainable transport’ options for employees between population centres and rural areas.

Around 300,000 people each year visit Bateman’s at Burwash and Bodiam Castle mostly arriving/leaving by car. An RDC voice in favour of public transport access to both would be helpful. A new public transport link to Bodiam via a restored rail service from Robertsbridge would be another plank in recovery plans for the tourism industry, at the same time removing many vehicles from lanes hardly suited to heavy traffic, and a bus to Bateman’s would seem essential in that role while also linking Uckfield station, Heathfield, Burwash, Etchingam station, Hurst Green and Hawkhurst. The recently restored Sunday service between Hastings and Hawkhurst (Stagecoach 349) has been a success, used by local people and visitors.

- iv. There were a lot of comments from residents about specific improvements to public transport forms.

h) Include Farmland and the Working Countryside

- i. **High Weald AONB Unit:** First, the draft Strategy must not ignore the potential of Rother’s farmed fields, grasslands, and soils or the role of agriculture to 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. Ensuring agriculture and horticulture can fully meet this potential will require a move away from industrial petro-chemical farming towards regenerative agriculture. This form of farming focuses on the health of the soil and using a set of practices it restores the natural fertility of the farm and captures and stores more carbon than it emits while also producing nutrient-dense food, clean and plentiful water, and abundant above and below ground biodiversity. The High Weald AONB partnership is taking the lead promoting regenerative agriculture in the area and supporting those increasing numbers of farmers and growers interested in and moving to regenerative agriculture. Given this, we would be very keen to work with RDC to explore how the final Environment Strategy could support and encourage the vital contribution the district’s farmed landscape and regenerative agriculture could offer in the face of the looming climate and ecological crisis.
- ii. **Dr Simon Forster:** Beyond the subject of trees, the Draft Environmental Strategy report does not discuss the future management of the countryside in any detail. There is no discussion on agricultural environmental policies and how the Council intends to influence the environmental management of farmland, the sector that is, in terms of land proportion, the most important in the Rother District.
- iii. **Crowhurst Environment Group:** Despite ongoing degradation of the countryside, there is a lack of discussion on agricultural environmental policies with clear statements about how the Council intends to prioritise and influence

the environmental management of farmland, which forms the highest proportion of land in the Rother District. Rother District includes some of the best examples of medieval field layouts in Europe and has some of the finest example of wild flower meadows in Britain with the potential for this to be great.

i) Hydrogen and Biomethane

- i. **Southern Gas Networks:** 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 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 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. More detail on how we plan to accelerate towards a shared net zero future in 2045 by reducing our business carbon footprint and decarbonising the gas transported through our network can be found here: <https://www.sgnfuture.co.uk/>

More information about the Gas Goes Green programme we have developed with the UK's other gas networks to deliver the world's first zero carbon gas network can be found here: https://www.sgn.co.uk/sites/default/files/media-entities/documents/2020-04/ENA_GGG_launch_report.pdf

j) Vehicle Noise

- i. Transport Futures East Sussex - Background noise from, for example, the Bexhill to Hastings Link Road, has turned formerly tranquil areas into ones where it is no longer possible to fully gain solace from enjoyment of nature and heritage assets in what was a perfect setting. It is not just background noise that diminishes the experience: intermittent, sudden bursts of noise from 'high performance' vehicles of two and four wheels also diminishes that experience. On fine days, such bursts of noise are frequent and can be heard from up to a mile away in many parts of Rother from e.g. the A259, A265, Combe Valley Way or A21.

Effective regulation of vehicles which create such intrusions on passive enjoyment of the outstandingly beautiful aspects of Rother District is ineffective and not conducive to 'green tourism'. Close up, it's intimidating.