

Appendix A

Summary of SA/SEA Scoping Report Consultation Responses and Actions

Consultee	Section/Area of Report	Summary of Response/Comments	Action/Response to the Scoping Report
Statutory Consultee – Historic England	Whole Document	<p>Content that the Scoping report for Rother and Hastings local plans adequately covers the issues that may arise in respect of the potential effects of proposed development sites on heritage assets.</p> <p>Historic England has prepared generic guidance with regards to their involvement in the various stages of the local plan process which you may find helpful in preparing the Sustainability Appraisal. This is available to download here: https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/.</p> <p>The opinion is based on the information provided by the Council's and for the avoidance of doubt does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the plan which is the subject to consultation, and which may, despite the SEA, have adverse effects on the historic environment.</p>	<p>No action required.</p> <p>The Council will take account of guidance when progressing the SA</p>
Statutory Consultee – Environment Agency	Section 6 – Climate, Flooding and Coastal Change	<p>Para 95 - Perhaps just mention that the SFRA is a living document and is currently been updated. Strategic policies should be based on the best and latest available information.</p> <p>Para 99 - It may be appropriate to reference The River Basin Management Plan in Section 4 as well.</p> <p>No reference to the South East River Basin Flood Risk Management Plan https://www.gov.uk/government/publications/south-east-river-basin-district-flood-risk-management-plan</p> <p>No reference to the East Sussex local Flood Risk Management Strategy https://www.eastsussex.gov.uk/environment/flooding/localfloodriskmanagementstrategy/</p>	<p>The Council will reference the SFRA as a living document and will add reference to the two documents and insert web-links</p>
	Section 9 – Land and Water Quality	<p>Groundwater protection</p> <p>Note and welcome the inclusion of objectives with regard to water efficiency and land and water quality, but note that the new Local Plan should include specific policies to address brownfield sites, groundwater protection and key infrastructure development relating to surface water and foul water drainage, which would also be usefully stated in relevant text in the SA/SEA.</p> <p>Waste</p> <p>No comments at the moment, as the information in this report is very generic in relation to waste activities. We are happy to review any specific waste activities or sites and provide waste advice for them.</p>	<p>Will consider groundwater protection when developing policies in the Local Plan</p> <p>Groundwater protection is now referenced as a key issue in the development of the objective.</p> <p>We note EAs comments to review any waste activities or sites moving forward.</p>
Statutory Consultee – Natural	SA Framework Indicators	<p>A general observation is that some of the proposed monitoring indicators appear to monitor wider changes, rather than the effects of the plan itself. We advise that consideration is given to how indicators will work in practice, and in particular how they will monitor the effects of the plan</p>	<p>The Council will review each indicator to ensure that it is monitoring an effect of the plan and</p>

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England		as opposed to wider changes. We advise it would be best to resolve such matters at an earlier stage, and whilst it is not Natural England's role to prescribe what indicators should be adopted, advice on monitoring indicators is provided in following sections, where relevant.	not a wider impact.
	Section 4 - Biodiversity	<p>With regards to baseline data, the Sussex Biodiversity Records Centre hold a range of data on the natural environment. Information on Sites of Special Scientific Interest (SSSI) are available on Natural England's Designated Sites Viewer, including information on SSSI condition. Magic provides various data which you may find useful. Mapping layers include data in relation to Ancient Woodland, Local Nature Reserves, Priority Habitat Inventory, Sites of Special Scientific Interest (including their impact risk zones), Special Areas of Conservation, Special Protection Areas, and Ramsar Sites (including, where relevant, marine designations). You may also wish to draw on more detailed information on Special Areas of Conservation and Special Protection Areas from the Conservation Objectives and Site Improvement Plans for each site.</p> <p>Whilst SA objective 2 refers broadly to protection and enhancement of biodiversity, there are no references to biodiversity net gain (BNG). BNG is an approach that uses the development process to leave biodiversity in a better state than before, securing wider benefits for people and the environment, and is enshrined within NPPF paragraphs 9, 109 and 152. The Government has announced that net gains for biodiversity will be mandated through the forthcoming Environment Bill and increasing numbers of developers and local authorities are adopting biodiversity net gain. We advise that relevant objectives, appraisal questions and indicators include reference to BNG, to ensure your authorities can secure BNG through your forthcoming plans. In addition to providing benefits to biodiversity, it is important to note that projects securing BNG provide opportunities to deliver other benefits to local people and the environment, such as provision of accessible greenspace, sustainable drainage, outdoor learning opportunities, and it would be beneficial to consider how this relates to other aspects of your plans (including SA).</p> <p>Similarly, references to green infrastructure and habitat connectivity do not appear to be included within the proposed framework. The maintenance of existing and creation of new green infrastructure is key to securing resilient and coherent ecosystems and is also of relevance to adaptation to climate change. We suggest the inclusion of text which recognises the importance of green infrastructure and habitat connectivity, including the protection and enhancement of existing features but also the creation of new features, which can align with any BNG approaches developed for you area.</p> <p>You may wish to clarify reference to Biodiversity Action Plans, including reference to priority habitats and species, noting that plans/proposals resulting in impacts to irreplaceable habitats should not be supported (NPPF para 11 and 175).</p> <p>With regards to providing measurable and plan-specific indicators, the reference to the Area of Outstanding Natural Beauty (AONB) is vague. The indicator could be clarified with reference to how the option/policy/proposal supports the aims and objectives of the High Weald AONB Management Plan and the purposes of designation of the AONB (to protect and enhance</p>	<p>Comments are noted on the availability of baseline data.</p> <p>The Council will refer to Biodiversity Net Gain, green infrastructure and habitat connectivity within the key issues section rather than the objective itself. Seeking biodiversity net gain and enhancements to green infrastructure through development will ensure this objective can be met.</p> <p>The Council will add the following appraisal question to SA Objective 2 'achieve a net gain in biodiversity'</p> <p>The Council will draw out the priority habitats and species of relevance in its indicators.</p> <p>The Council has developed its SA framework with consideration of the environmental indicators that are readily available to the Council and as such have included indicators that the Council receives annually from the Sussex Biodiversity Record Centre. The Council will consider further monitoring indicators if necessary as the Local Plan progresses. An additional appraisal question has been provided to SA Objective 15 to reflect the objectives of the AONB Management Plan</p>

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		<p>natural beauty). Correspondingly, we advise the appraisal questions include reference to the AONB. Finally, you may wish to consider clarifying how the AONB is considered in relation to objectives for biodiversity and natural landscape, which are currently presented separately but with similar indicators.</p> <p>You may wish to consider the following with regard to monitoring/indicators for biodiversity objectives, or when informing appraisal questions:</p> <ul style="list-style-type: none"> • Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance (with commentary on area/nature of impact) • Contributions to net gain (with relevant commentary) • Percentage of development contributing to green infrastructure (with commentary on the contribution) • Amount of new development in AONB (with commentary on likely impact) 	
	Section 7 – Population, Health and Well-Being	Objective 9 appears to include reference to access to open (recreational) space. However, this is not reflected in the indicators against which the objective can be assessed. Given that access to open space is also addressed through objective 15, you may wish to consider clarifying references to open space and recreational space. This can avoid duplication and/or confusion between objectives, and to achieve a clear and consistent approach to your assessments.	To avoid crossover SA objective 9 has been amended to remove reference to recreation space, which is covered under objective 15.
	Section 9 – Land and Water Quality	With reference to objective 14, you may wish to consider reference to the requirements of the water framework directive and the impacts on relevant waterbodies of achieving good ecological status, or any site-specific water quality targets. This will encompass assessment of the plan on a wider range of receptors which could be impacted by water pollution/altered water quality as a result of the plans.	Agreed to include reference to this as part of the key issues under para 172 as an introduction to the objective.
	Section 10 – Natural Landscape	Advice on access to open space is referenced under section 5 of this letter, however objectives under section 10 appear to refer specifically to access to open green space; you may wish to consider if a distinction between the two objectives need to be made. Although baseline trends for this theme (within the Scoping Report) do not appear to include specific reference to access to open and green space data, it is included in Appendix 2. It would be beneficial to reference the detailed indicators from Appendix 2 as indicators in the SA framework document. As advised under section 2 of this letter, it would be beneficial to clarify how assessment against AONB indicators differs from that/those associated with 'biodiversity' objectives. Also note that the NPPF requires designated landscapes to be conserved and enhanced.	The Council will consider moving the indicator for access to woodland to section 10 for the final SA if it is deemed necessary.
	Additional Comments in relation to the Pevensey Levels SAC and Ramsar Site	We are aware of the significant pressure on local authorities to provide housing, and the challenges this brings in relation to securing sustainable development. As you are already aware, the wetland environment of the Pevensey Levels is susceptible to deterioration brought about by water pollution from surface water run-off from large levels of planned development. Without suitable measures, runoff from developed areas (including for example sediment, litter, oils grit, metals, fertiliser, pesticides, animal waste, salts and pathogens) in the catchment would eventually enter the watercourses of the Pevensey Levels, resulting in deterioration of the water quality. In addition, water availability is a concern in the catchment, and whilst the area is subject to a water level management plan, altered run-off patterns resulting from development can impact the hydrology of the area.	These comments can be addressed as part of the development of the Local Plan, the Sustainability Appraisal and the Habitats Regulation Assessment.

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		<p>We are committed to continuing to work with your authority to support sustainable development which does not adversely impact designated sites. This includes work to secure appropriate solutions for suitable development in the Pevensy catchment. We have worked with your authority to secure robust policy and approaches in this regard, including advice on sustainable drainage. We look forward to continuing engagement to ensure both strategic and site specific measures to protect designated sites are included in future local plan documents.</p> <p>I attach at Annex A our current advice on development within the Pevensy Levels (which you are already familiar with). In addition, please note that 'Pevensy Levels SAC European Site Conservation Objectives: Supplementary advice on conserving and restoring site features' was published on 25 March 2019 and is available in the appendix.</p>	
Highways England	Whole Document	<p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with policies and proposals that have the potential to impact the safe and efficient operation of the SRN.</p> <p>Overall, Highways England supports strategies, policies and land allocations which will support alternatives to the car and promote the operation of a safe and reliable transport network.</p> <p>We note that paragraph 222 of the SA/SEA Scoping Report refers to Rother District Council's Draft Environmental Strategy. We have recently commented on the Draft Environment Strategy and ask that you are mindful of the matters we raised.</p> <p>We do not wish to make any comments on the Rother District Council and Hastings Borough Council SA/SEA Scoping Report. However, please continue to consult us as the Local Plan and SA/SEA process develop at PlanningSE@highwaysengland.co.uk.</p>	Consider HE's response to RDC's Draft Environment Strategy as below.
Highways England	Matters raised on RDC'S Draft Environmental Strategy	<p>We are concerned with policies and proposals that have the potential to impact the safe and efficient operation of the strategic road network. In the case of Rother District, this relates to the A259 and A21 trunk road.</p> <p>Overall, Highways England supports strategies, policies and land allocations which will support alternatives to the car and promote the operation of a safe and reliable transport network. We note that Section 3 on air Quality within the Draft Environmental Strategy 2020-2030 document includes the action "<i>We will explore options to make urban areas, such as Bexhill town centre, car free or restricted vehicular access.</i>" 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.</p>	<p>The Council notes Highway England's comments and will continue to liaise with them as the Local Plan is developed. An early engagement consultation stage undertaken in August-October 2020 will assist with this.</p> <p>No changes required at this stage to the SA.</p>

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		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.	
Sport England	Section 7 – Population, Health and Wellbeing	<p>Para 117 – Rother and Hasting PPS. The PPS identifies the need for both Councils to protect and prevent the loss of existing sports pitches and seek to deliver an increased supply of suitable pitches in line with population growth. These need to be in appropriate locations accessible by a range of transport options including active and sustainable modes (walking and cycling). I would suggest that a specific measure of how local plan policies perform in this respect should be added.</p> <p>Para 126 - 30 minutes travel to key services by public transport or walking will be unrealistic in much of rural Rother. In urban areas some of these services should be much closer than 30 minutes PT/walking distance/cycling distance i.e. local food shops, primary schools and GPs would be closer than a town centre or hospital. 15 or 20 mins is a more appropriate indicator and would set a more aspirational target for sustainable neighbourhoods.</p>	<p>Currently the Council is not able to monitor the net change in sports pitch provision, so consider it not appropriate to include at this stage.</p> <p>The Council will add data in relation to 15/20mins access by public transport in order to include this.</p>
	SA Framework Indicators	<p>9. improve accessibility and affordability to essential local services list in brackets to include formal and informal indoor and outdoor sport and recreational facilities</p> <p>Promote compact development and walkable neighbourhoods (15 – 20 minutes)</p> <p>See comment above re: 30 minutes travel time</p>	The Council will add data in relation to 15/20mins access by public transport in order to include this.
Hastings and Rother CCG	Whole Document	<p>Hastings and Rother contains the eight most deprived council wards in East Sussex. These experiences of deprivation contribute to poorer health outcomes with higher rates of long-term illness, disabilities, cancer, lung disease and heart problems as compared with the rest of the county.</p> <p>The CCG looks forward to continuing our collaborative work with the two councils. This has been developed in recent years through the Healthy Hastings and Rother Programme and our membership of the Local Strategic Partnerships and other themed partnerships such as Safer Communities, CHART (Connecting Hastings and Rother Together), Active Hastings and Active Rother and our joint work to support vulnerable population groups such as Rough Sleepers. We also look forward to working with the two Councils to ensure that the infrastructure delivered as part of the resulting local plans, is considered in partnership with the health sector. This is to ensure that primary care provision and other key health infrastructure (notably that provided by East Sussex Healthcare NHS Trust and Sussex Partnership Foundation NHS Trust), is considered alongside the growing needs and size of the local population.</p> <p>In light of the current response to Covid 19 for local people, it will be important to consider our learning as we further develop these plans in partnership. For example, learning from the establishment of Community Hubs and considering plans to address further anticipated health inequalities resulting from Covid 19, alongside known and expected impacts on local people in relation to their protected characteristics (for example our Black and Minority Ethnic (BAME)</p>	<p>Reference to Hastings and Rother CCG will be changed to East Sussex NHS CCG.</p> <p>The Council look forward to working with the East Sussex NHS CCG in developing its Local Plan.</p>

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		<p>communities).</p> <p>Please note that within the documents provided as part of this consultation, the CCG is referred to as Hastings and Rother Clinical Commissioning Group. Can this please changed to East Sussex NHS Clinical Commissioning Group.</p> <p>The CCG has been asked to nominate an officer who will be responsible for responding to the Local Plans and providing input to their key developments stages as identified by each Council. Richard Watson, Assistant Head of Health, Wellbeing and Partnerships has been identified as the lead contact for the CCG and he will co-ordinate work with other CCG officers as appropriate, for example those representing primary care services.</p>	
	Section 3 – Air quality	<p>Objective 1 - Reduce air pollution from transport and development and improve air quality - We would support measures to encourage local people to use sustainable forms of transport, to support good air quality and the associated positive impact on the health and wellbeing of local people this has.</p> <p>We also recognise that along with the CCG, many organisations have put in place work from home arrangements for staff, in response to the Covid-19 pandemic. As a result, there is learning from this approach, which can contribute to improved health and wellbeing for local people such as air quality improvements.</p>	These comments are noted by the Council and these will help shape the Local Plan. No change required to the SA.
	Section 4 – Biodiversity	<p>Objective 2 - Biodiversity is protected, conserved and enhanced - We would support the protection, conservation and enhancement of outdoor spaces that promote positive physical and mental well-being for the public.</p>	No action required.
	Section 5 – Energy and Water Consumption	<p>Objective 3 - The causes of climate change are addressed through reducing emissions of greenhouse gases (mitigation) and preparedness for its impacts (adaptation). Objective 4 - Minimise water consumption - We would support the development of renewable energy that is embedded within community infrastructure. This is in light of the contribution that this could make to lowering energy costs for NHS infrastructure, therefore supporting NHS financial sustainability. In addition, for local people, reduced energy costs creates increased personal income, which contributes to the healthy choices local people can make for themselves.</p>	These comments are noted by the Council and these will help shape the Local Plan. No change required to the SA.
	Section 6 – Climate, Flooding and Coastal Change	<p>Objective 5 - The risk of flooding (fluvial, tidal and surface water) is managed and reduced, now and in the future. Objective 6 - The risk of coastal erosion is managed and reduced, now and in the future - Acknowledging the impact of flooding on the health and wellbeing of those affected, we would support considered approaches to flood risk mitigation. We would also suggest that initiatives related to coastal erosion and the associated public safety issues are considered in partnership with relevant organisations.</p>	These comments are noted by the Council and these will help shape the Local Plan. No change required to the SA.

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	Section 7 – Population, Health and Wellbeing	<p>Objective 7 - The health and wellbeing of the population is improved and inequalities in health are reduced.</p> <p>Objective 8 - More opportunities are provided for everyone to be in a suitable home to meet their needs.</p> <p>Objective 9 - All sectors of the community have improved accessibility to services, facilities, jobs, and social, cultural and recreational opportunities.</p> <p>Objective 10 - Safe and secure environments are created and there is a reduction in crime and the fear of crime -</p> <p>The NHS Long Term Plan commits the NHS and therefore the CCG to a greater focus on prevention and on health inequalities.</p> <p>Hastings and Rother contains the eight most deprived council wards in East Sussex. Social and economic deprivation contribute to significant health inequalities such as higher rates of long-term illness, disabilities, cancer, lung disease and heart problems as compared with the rest of England. Deprivation also imposes significant problems at a personal and community level, leading to low education attainment, poor employment prospects, low incomes, inability to find and afford suitable accommodation, crime and fear of crime and poor community cohesion. Poor health caused by health inequalities can also contribute to further social and economic exclusion thus exacerbating and perpetuating inequalities. We also anticipate that these health inequalities will deepen as a consequence of Covid 19. We value the opportunity to further develop these plans, in light of the known and expected impact Covid 19 has had on communities in relation to protected characteristics (for example BAME communities).</p> <p>We would support positive measures to minimise the impacts of poor housing conditions on the health and wellbeing of local people (for example recognising the link between poor housing conditions and exacerbation of Long Term Conditions for people such as respiratory conditions).</p> <p>We therefore support the development of sustainable action by District and Borough Councils as part of an integrated approach to achieving positive outcomes, in partnership with the NHS and other statutory, voluntary and community sector partners.</p> <p>Several local strategy and web references need updating within this section of the scoping report. These are as follows:</p> <p>Para. 112</p> <ul style="list-style-type: none"> Reference and weblink should now be the East Sussex Health and Social Care Plan. https://www.seshealthandcare.org.uk/wp-content/uploads/2019/10/191028-DRAFT-Appendix-East-Sussex-place-plan-v5.pdf <p>Deleting reference to page 7 of the previous Five Year Plan.</p> <p>Para. 113</p> <ul style="list-style-type: none"> All CCG references to be updated to East Sussex rather than Hastings and Rother. Weblink for Healthy Hastings and Rother Programme information to be updated to 	<p>These comments are noted by the Council and these will help shape the Local Plan.</p> <p>Amendments will be made to para 112, 113 and 115 to insert the suggested web-links provided.</p>

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		<p>https://www.eastsussexccg.nhs.uk/priorities-and-programmes/reducing-health-inequalities/healthy-hastings-and-rother</p> <ul style="list-style-type: none"> • Weblink for Healthy Hastings and Rother 2019 summary to be updated to https://www.eastsussexccg.nhs.uk/wp-content/uploads/sites/3/2020/03/Health-Inequalities-A5-2019-FINAL.pdf <p>Para. 115</p> <ul style="list-style-type: none"> • Weblink should now be to the Active Rother Partnership strategy https://www.activerother.org.uk/wp-content/uploads/2019/01/AR-Sport-and-Physical-Activity-Strategy_V4-Final.pdf • Also recommend including the Active Hastings strategy which has similar focus to the Rother version https://www.hastings.gov.uk/sport_play/strategies/partnership/ 	
	Section 8 – Heritage	<p>Objective 11 - Historic environment/ townscape is protected, enhanced and made more accessible -</p> <p>We would support approaches to the protection, enhancement and improvements in accessibility to local heritage, as it is acknowledged that this can have a positive impact on individual and community wellbeing, including outcomes such as increased confidence, social connectivity, sense of belonging and collective empowerment.</p>	No action required.
	Section 9 – Land and Water Quality	<p>Objective 12 - The risk of pollution to land and soils is reduced and quality is improved.</p> <p>Objective 13 - Through waste re-use, recycling and minimisation, the amount of waste for disposal is reduced.</p> <p>Objective 14 - The risk of pollution to water is reduced and water quality is improved.</p> <p>Acknowledging the impact of land and water pollution on the health and wellbeing of those affected, we would support considered approaches to reduce the risk of potential occurrence -</p> <p>Acknowledging the impact of land and water pollution on the health and wellbeing of those affected, we would support considered approaches to reduce the risk of potential occurrence.</p>	No action required.
	Section 10 – Natural Landscape	<p>Objective 15 - Ensure that Parks, gardens and countryside are protected, enhanced and made more accessible.</p> <p>We would support connecting health and wellbeing opportunities for local people of all ages (noting the need to provide safeguards for certain groups such as children) that maximises health and wellbeing in a way that is easy to access and free.</p>	These comments are noted by the Council and these will help shape the Local Plan. No change required to the SA.
	Section 11 – Skills, Employment and Economic Development	<p>Objective 16 -Economic performance is improved.</p> <p>Objective 17 - There are high and stable levels of employment and diverse employment opportunities for all.</p> <p>Objective 18 - Levels of poverty and social exclusion are reduced and the deprivation gap is closed in the more deprived areas.</p> <p>Objective 19 - Opportunities are available for everyone to acquire new skills, and the education and skills of the population improve -</p>	These comments are noted by the Council and these will help shape the Local Plan. No change required to the SA.

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		<p>We acknowledge the link between deprivation, economic growth, education, skills and employment and exclusion and health outcomes. The positive impact that health has on economic growth and poverty reduction, occurs through less worker illness, increased productivity, lower absenteeism rates and improved learning among school children and adults, higher incomes and improved housing accessibility.</p> <p>We therefore support the aspirations set out in these objectives and would wish to further develop our collaborative work with the two councils, established in recent years through the CCG's membership of the two Local Strategic Partnerships, the Hastings Opportunity Area Board and the CHART (Connecting Hastings and Rother Together) Executive Board.</p>	
	Section 12 - Transport	<p>Objective 20 - Road congestion levels are reduced and there is less car dependency and greater travel choice -</p> <p>Measures to encourage walking and cycling as part of an approach to develop greater travel choice are important to the health and wellbeing of local people. We would therefore support plans to encourage local people to be more active and use sustainable forms of transport. We would suggest that when considering these travel choice options, it would be helpful to develop these in conjunction with local NHS facilities such as GP practices, other community health facilities and the local hospitals.</p>	These comments are noted by the Council and these will help shape the Local Plan. No change required to the SA.
Marine Management Organisation		No response	N/A
South East Coastal Group		No response	N/A
East Sussex County Council	Whole Document	<p>We have outlined initial officer thoughts and points which have identified a few areas which we believe need to be expanded and updated particularly around climate change, heritage, health and transport.</p> <p>Please note that it has not been possible to go into detail in all areas of the report and appendices in responding to this consultation or to involve all relevant officers. As you can appreciate due to the Covid 19 situation many officers are involved in priority work areas and/or have been redeployed to front line services. We however expect that through future engagement with the Local Plans and supporting evidence documents advice can be provided which will cover all areas of relevance and expertise of the County Council.</p> <p>References should only be made to the East Sussex Environment Strategy 2020. This has updated the previous Environment Strategy adopted in 2011. There have been significant changes to national, regional and local policy and strategies since 2011 therefore it is not appropriate to refer to the earlier strategy. The 2020 Strategy aligns with the latest national, regional and local strategies and identifies the current key challenges, opportunities, aims and</p>	<p>All references to the Environment Strategy in 2011 will be removed.</p> <p>The Council is undertaking early engagement with ESCC on its Local Plan which will outline the timeframes for input from ESCC and how the Council will approach its Duty to Cooperate duties.</p>

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		<p>actions for the County.</p> <p>ESCC officers are happy to engage wherever possible at key stages in the plan making process and in producing evidence documents which are of relevance to the County Council to assist Hastings Borough and Rother District Councils in producing sound Plans. However, resources are limited and it maybe necessary at certain times to prioritise other work areas, therefore responses or advice may have to be limited or extensions to deadlines will be requested.</p> <p>We would ask in order to ensure that wherever possible deadlines are made that we are given as much advance notice as possible of consultations. A frequently updated work programme would also be helpful.</p>	
	Section 6 – Climate, Flooding and Coastal Change	<p>The importance of the climate change emergency and the need for it to drive a lot of policy areas is not fully recognised in this report. There should also be recognition in the report regarding the cross-cutting nature of the climate change agenda. It is confusing to where climate change sits in the report and there is no acknowledgement of the overlap between areas and objectives this needs to be clarified.</p> <p>For example, it appears that climate change is covered within the ‘Energy and Water Consumption’ chapter, however the chapter does not fully cover decarbonisation and the links with air quality and transport. ‘Key Issues’ do not cover carbon reduction only gas and water consumption. Climate Change is also referenced in the ‘Climate, Flooding and Coastal Change’ chapter, though most of this chapter including the Key Issues deals only with Flooding and Coastal Change. It is recommended that there is a separate chapter on climate change which recognises the links to other areas and objectives such as air quality, transport and flood risk.</p> <p>Though in the SA Framework Objective 3 on climate change it does reference the need to minimise the need to travel this is not reflected in the report’s chapters. There is no mention of the general policy steer on the valuable role that transport must play in reducing carbon emissions and helping meet climate change goals. There is within national and regional policy a clear direction on the importance of using planning to help reduce the future need to travel particularly by car and the need to increase journeys undertaken by walking, cycling and/or public transport. It is important that these points are made clear in any chapter on climate change.</p> <p>Reference should be made to the East Sussex Local Flood Risk Management Strategy 2016-2026.</p>	<p>The cross-cutting nature of climate change agenda can be explained in the introductory paragraphs of the report before introduction to the key themes as it influences all of the objectives, not necessarily just sections 3 and 6 of the report</p> <p>The key issues in Section 3 will be expanded to make reference to decarbonisation and the links to air quality and transport, including the role that transport must play in reducing carbon emissions.SA Objective 3 is directly linked to climate change and this stems from the Energy and Water Consumption chapter.</p> <p>Reference to the East Sussex Flood Risk Management Strategy will be added to Section 6.</p>
	SA Framework Indicators	<p>SA Framework: Objective 3 Appraisal questions should be further strengthened and be more proactive on these points, suggested changes are in red text:</p> <p>Will the option/proposal/policy help to...</p> <ul style="list-style-type: none"> • Promote Lead to efficient land use patterns that minimise the need to travel? 	The appraisal questions will be amended as suggested.

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		<ul style="list-style-type: none"> • Lead to more sustainable travel including walking, cycling and public transport? • Does it support Enable the take up of low or ultra-low emission vehicles? 	
	Section 7 – Population, Health and Wellbeing	<p>The report refers to out of date plans. It is recommended that the following plans are referenced, and the key points from the documents are covered and incorporated within the key issues and the SA objectives.</p> <ul style="list-style-type: none"> • Annual Report of the Director of Public Health in East Sussex 2019/20: Health and Housing Report • East Sussex Health and Social Care Plan – April 2020 • Strategic Delivery Plan: Response to the NHS Long Term Plan – 15 November 2019 	The first two listed documents will be referenced in this chapter and any impacts on the key issues and objectives will be addressed. The third document was reviewed not considered essential to summarise as the main points had been raised through other reports.
	Section 8 – Heritage	<p>Relevant Plans and Programmes should also mention the Scheduled Monuments and Archaeological Areas Act 1979 https://historicengland.org.uk/advice/hpg/has/scheduledmonuments/</p> <p>The local data is presented in different ways for Rother and Hastings. Hastings provides actual numbers against various categories and this data could be presented in the same format for Rother for continuity and would link to Appendix 2 table data.</p> <p>Information on Hastings includes the figure of 300 for sites, monuments and finds and is additional to the 32 archaeological notification areas (ANAs), the ANA figure of 27 is incorrect. It is not sure how much value these extra numbers/categories add as they are a little bit meaningless unless you know what they all relate to, but they provide a very coarse indication of what is known. If this data is included it should also be presented for Rother.</p> <p>It would be good to name check Winchelsea as much of this town is a Scheduled Monument and is a very rich source of medieval archaeological/architectural data (both above and below ground).</p> <p>The ESCC Historic Environment Records (HERs) should be mentioned as a source of baseline data.</p> <p>The 'Key Issues' focus is on built heritage but should also include below ground assets. In terms of making archaeology more accessible, community engagement is to be encouraged during planning-led commercial archaeological investigations (i.e. site open days, talks to local societies etc). This is already part of the planning requirements for sites of particular interest and is written into the Sussex Archaeological Standards which archaeological contractors abide by.</p> <p>Paragraph 147 should include the potential for development to also impact on below ground heritage assets both known and as yet unknown.</p> <p>The SA objective is rather simplistic and difficult to apply to below ground heritage assets which cannot be protected/enhanced/made more accessible in the same way (or at all) when</p>	<p>The link to Scheduled Monuments and the Archaeological Areas Act 1979 will be provided.</p> <p>Reference will be made to Winchelsea as a rich source of archaeology along with the Historic Environment Records Data.</p> <p>The Council will confirm the correct number of ANAs in Hastings and will try to ensure there is consistency in this section in relation to the data presented for each Local authority.</p> <p>The key Issues section will be amended to confirm that the historic environment includes built heritage and archaeology (below ground). Para 147 will be amended to mention below ground heritage. An additional SA question has been included to reflect that archaeological resources will be considered.</p> <p>The SA objectives have deliberately been developed to be made as simple to understand and apply as part of the SA framework. It is considered that the 'protected' element of the objective would allow for below ground heritage to be</p>

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		<p>compared with built heritage. It would be good to see a statement that allows for prior investigation/assessment of below ground heritage assets (known & unknown) and 'preservation by record' where identified archaeological remains will be unavoidably impacted by development. The HER could also be mentioned here too.</p>	<p>considered appropriately and preservation through planning applications to be applied.</p>
	SA Framework Indicators	<p>The SA Framework Appraisal questions should also cover archaeology it is suggested that it includes: Will the option/proposal/policy help to... identify sites of archaeological potential through consultation of the HER/desk-based impact assessment/fieldwork.</p> <p>Appendix 2 Indicator tables – The following provides additions and updates to the table. ANAs based on current ESCC HER data (04/06/2020):</p> <ul style="list-style-type: none"> o Rother = 518 o Hastings = 32 <p>Scheduled Monuments</p> <ul style="list-style-type: none"> o Rother = 39 o Hastings = 6 <p>Registered Parks & Gardens</p> <ul style="list-style-type: none"> o Rother = 7 o Hastings = 2 (plus we have records for 4 locally listed assets – Bohemia Estate, Linton Gardens, White Rock Gardens/Pleasure Grounds & Wellington Gardens) <p>Registered Battlefields</p> <ul style="list-style-type: none"> o Rother = 0 o Hastings = 1 	<p>The additional appraisal question to cover archaeology will be added as discussed above.</p> <p>The indicator tables have been updated to include the latest data from Historic England, which was for 2018/19, as this is publicly available and updated annually. This indicator is shared with the AMR. In addition, the ANA figure for Rother (518) that is stated is not consistent with the data we have received.</p>
	Section 12 - Transport	<p>There needs to be more focus on the principles and objectives coming out of Transport for South East (TfSE) Transport Strategy which provides the direction for transport policy and planning in this region. It highlights that land use planning and transport planning must become more closely integrated. It focuses on the importance of more planning for people and more planning for places over the life of the strategy to 2050.</p> <p>Reference needs to be made to the emerging Local Cycling and Walking Infrastructure Plan (LCWIP). This sets out the current direction of work in this area and will be ensuring a consistent approach across the County. It is therefore important that the LCWIP and subsequent versions, as it will be a living document, is used to inform Local Plans and their policies.</p> <p>Please note that work is starting on Local Transport Plan 4 which will build on the key messages and direction coming out of TfSE Transport Strategy and the LCWIP. It will be essential that Local Plans and the Local Transport Plan are developed together to ensure a consistent and integrated approach to common objectives around climate change, air quality, health, accessibility, connectivity and place shaping.</p>	<p>Paragraph 220 which discusses the TfSE Transport Strategy will be further developed to draw out the points raised.</p> <p>Reference will be added to the emerging Local Cycling and Walking Infrastructure Plan (LCWIP).</p> <p>The Council can consider the implications of LTP4 as it is developed alongside the Rother Local Plan.</p>
	SA Framework	<p>Objective 20 Appraisal questions should be further strengthened and be more proactive, suggested changes are in red text:</p>	<p>The appraisal questions will be amended as proposed.</p>

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	Indicators	<p>Will the option/proposal/policy help to...</p> <ul style="list-style-type: none"> • Promote Enable more sustainable transport patterns including walking, cycling and public transport? • Reduce the need to travel by car through: the location and design of new development, and places which provide more opportunities for active travel, and for the provision and link to public transport infrastructure? 	
Wealden District Council	Whole Document	<p>The Council has no specific comments to make on the report.</p> <p>We note that the SA identifies some cross boundary strategic issues. We would be happy to take these forward as part of the Duty to Cooperate process and to address them in the formulation of a Statement of Common Ground. We would like to meet shortly to start this process in relation to both Rother's Local Plan Review but also in relation to our Local Plan, of which we are also in the early stages in preparation. We will be in contact shortly with some potential dates for a meeting.</p>	<p>RDC has prepared a Duty to Cooperate Action Plan, outlining the stages in which WDC will be engaged in plan making. Consultation was undertaken on this from August-October 2020.</p> <p>RDC are committed to working with Wealden DC on our respective Local Plans</p>
Tunbridge Wells District Council	Whole Document	<p>Not a strict requirement for Scoping Report but, as is often the case with such a broad topic mater, the report is lengthy and would benefit from Non-Technical Summary that briefly explains the process, key findings and outcomes.</p> <p>You'll be aware from Duty to Cooperate meetings, that TWBC is planning development at Hawkhurst that is likely to impact upon Flimwell and the A21 junction. In addition, a cross county bus service between Hawkhurst and Etchingham train station has been discussed in the past.</p>	<p>The Council does not intend to produce a non-technical summary at this stage, but will produce one for the SA reports when published for wider public consultation.</p> <p>Comments are noted with regards to transport infrastructure impacts for the emerging Rother District Local Plan.</p>
	Approach to SA Scoping	Para 13. It would be worth mentioning the provision for net gains in this paragraph as it is such a significant part of the new bill.	Reference to Biodiversity net gain will be added in to the report.
	Section 3 – Air Quality	Para 20. Biodiversity 2020: A strategy for England's Wildlife and Ecosystem Services could be added under National Policies and Plans.	Reference to this report will be added.
	Section 4 - Biodiversity	Page 23. Do you have any local or regional declarations of biodiversity emergency to include?	This is not relevant to Rother or Hasting's Councils.
	Section 5 – Energy and Water Consumption	<p>The significant amendment to this Act in 2019 changing the 2050 target from 80% to 100% (i.e. net zero) needs to be mentioned.</p> <p>You have chosen to separate climate change mitigation and adaptation into different chapters. For this reason, Para 80 is not relevant to energy consumption. If you continue with this structure, these aspects should be included in para 96 only.</p>	<p>Paragraph 79 will be amended to state the amendment to the UK Climate Change Act in 2019.</p> <p>For clarity it would be appropriate to move paragraph 80 to be included as part of paragraph 96.</p>

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		<p>Page 36. It would be worth mentioning the East Sussex Climate Emergency declaration and targets.</p> <p>Para 86. This paragraph needs updating to reflect Hastings recent 2020 strategy to ensure it is consistent with para 106.</p>	<p>Paragraph 86 will be amended to ensure it is consistent with para. 106.</p>
	<p>Section 6 – Climate, Flooding and Coastal Change</p>	<p>Para 107. No context is provided for the list. Presumably, these are actions on the 2 year action plan? In addition, none of these actions relate to climate change adaptation (the topic for this chapter). It be more logical to list these actions in relation to Chapter 5 (Energy Consumption).</p> <p>Para 107. The longer term action plan will be most relevant to the new Local Plans.</p> <p>Para 114. Many environmental bodies would recommend highlighting climate change adaptation as a key issue for local plans. You have considered flood risk and coastal erosion but there is also the impact that rising temperatures and overheating will have on human health and wellbeing.</p>	<p>Para 107 will be amended to make clear that these are action points in relation to the 2 year plan. It is considered that there is cross-over between the two chapters and that this is relevant to both chapters.</p> <p>Climate change is addressed as part of sustainability objectives identified at para 93. It therefore does not need to be repeated.</p>
	<p>Section 9 – Land and Water Quality</p>	<p>Page 69. Waste generation is being discussed in the Pollution chapter but the specific monitoring data and resultant objective is a resource and consumption issue, rather than an pollution issue per se. It might be better placed in Chapter 5 which could be renamed 'Resource Consumption'?</p>	<p>Waste generation is part of the land and water quality which does include consumption factors that affect the quality of land and water. No change required.</p>
	<p>Section 12 - Transport</p>	<p>It might be useful to distinguish between sustainable and active travel to demonstrate clearly that consideration is being given to more than public transport.</p>	<p>It is considered that this is not required.</p>
	<p>SA Framework Indicators</p>	<p>Number 3 should refer to regional and local carbon neutrality targets too as these are more ambitious than the national targets.</p> <p>Number 3. None of these appraisal questions relate to climate change adaptation as the SA objective suggests. See comments above about incorporating a consideration of climate change adaptation that goes beyond flood risk. All questions relate to reducing emissions i.e. climate change mitigation.</p> <p>Number 10. It could be worth distinguishing between active and sustainable travel?</p> <p>Page 13. The conflict between objective 4 (water consumption) and meeting housing need should be highlighted as red and described in the text.</p> <p>Page 13. As this report will go onto your website, Accessibility Standards which come into effect in September 2020 will need to be considered. The red and green colours in this table could be problematic. This will also be an important consideration later down the line, when you consider how to illustrate scores for the SA itself.</p>	<p>SA appraisal questions have been reviewed in the round to ensure they are appropriate. Climate change is a cross cutting theme and will be relevant to most SA objectives</p> <p>The conflicts between SA objectives will be addressed before the final SA report is published, including the impacts for accessibility standards.</p>
	<p>Appendices 2,3 and 4</p>	<p>Very useful summary tables.</p> <p>As this report will go onto your website, accessibility standards will need to be considered. The red and green colours in the tables could be problematic. On some pages, the text size is too small if printed at A4. Seek advice from your digital services team or equivalent.</p>	<p>Accessibility standards will be assessed before the final SA report is published publically.</p>

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Ashford Borough Council	Whole Document	<p>The Borough Council has no comments to make on the Scoping Report and believes it forms a sound basis for taking forward the SA/SEA. The Borough Council would like to take this opportunity to draw your attention to the SOCG that was agreed between ABC and RDC in November 2017 at the time of the Ashford Local Plan Examination – copy attached for your information.</p> <p>In particular I would draw your attention to the section headed Future Collaboration and paragraphs 8, 9 and 10 of the document. Clearly, as drafted the SoCG related to the Rother Core Strategy (Local Plan) only, but may be equally relevant to the Hastings Local Plan. The SOCG clearly indicates the desire to collaborate closely when our respective Local Plans are taken forward and on that basis I would like to suggest a meeting to discuss matters of mutual interest, involving Hasting BC if you deem that appropriate. I would also like to highlight the infrastructure matters shown in paragraph 10 of the SOCG that are still relevant.</p>	These comments will be taken into account in order to inform the preparation of the Rother District Local Plan.
Folkestone & Hythe District Council	Section 4 - Biodiversity	<p>The only comment I would make on behalf of Folkestone and Hythe District Council is to suggest reference is made in the Biodiversity chapter to the Dungeness Sustainable Access and Recreational Management Strategy (2017).</p> <p>The SARMS was prepared following the commitment from both Folkestone & Hythe and Rother District Councils. The need was identified in both Councils' Local Plan Core Strategies and supporting Habitats Regulations Assessments (HRA), which raised concerns of possible additional pressure and disturbance on the internationally important wildlife sites caused by increased recreational activities as a result of the councils' planning policies. For the overall strategy area, it was found that there was a degree of disconnect between the tourism and natural environment sectors. Raising the profile of the nature conservation value of the strategy area, through a focused partnership working towards a shared agenda, should benefit the visitor economy and move it in a more environmentally-aware and sustainable direction, which could prove mutually beneficial. The Strategy also sets out measures needed to mitigate the relevant impacts.</p>	The SARMS will be referenced in the Biodiversity Chapter as this will be brought forward as an important consideration for the Local Plan.