



Date: 23/7/24

**This response was submitted online through the Rother Consultation Portal**

Q1. What are your views on the Council's Vision?

SWT supports the vision and particularly the ambition for bold solutions to address the climate and biodiversity emergencies. We also support the requirement for Biodiversity Net Gain and for the district to contribute to the UK's carbon and nature recovery goals.

Q2. What are your views on proposed twin Overall Priorities to be 'Green to the Core' and 'Live Well Locally'?

SWT supports the twin priorities. We strongly support the principle of the biodiversity crisis being central to all planning decisions, however we feel that the explanation of 'Green to the Core' needs to be more explicit. We suggest that the second bullet point should be amended as follows:

'playing a key role in the UK's nature recovery and carbon sequestration through protecting, enhancing and expanding our landscape and environmental assets and prioritising nature based solutions.'

Q6. What are your views on the Council's proposed policy for net zero standards and which parts of the policy do you support?

SWT supports the inclusion of this policy.

Q7. How important is it for Rother to seek to set high standards?

All local authorities have a key role in meeting the country's climate change targets. It is vital for Rother to enable the development of low energy homes.

Q13. What are your views on the proposed policy for water efficiency?

SWT strongly supports this policy and particularly the encouragement of other water efficiency measures, such as grey water recycling, green walls and roofs.

Q20. What are your views on the Council's proposed policy for Local Nature Recovery Areas?

SWT strongly supports the inclusion of this policy. It is vital that Local Nature Recovery Strategies (LNRS) are embedded into the planning system to ensure that development avoids our most important sites for biodiversity, in line with the mitigation hierarchy, and avoids sites in recovery. LNRSs will also be key to directing BNG efficiently to achieve the highest gains for biodiversity possible.

Q22. What are your views on the Council's proposed policy for Biodiversity Net Gain?

SWT supports this policy.

Q23. What are your views on the Council going above the national minimum requirement of 10%?

SWT supports the blanket minimum of 20%. The draft local plan states the viability of development is unlikely to be unduly impacted by the higher minimum in most cases. We also know that the UK is one of the most nature depleted countries in the world and that ambitious application of BNG is needed to contribute to nature's recovery. Other local plans have been adopted with policies that require more than 10% BNG and we encourage Rother District Council to set out a strongly evidenced case for the need for it in the district.

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Q45. What are your views on the Council's proposed policy on streets for all?

SWT supports this policy, in particular the requirements for Tree Lined Streets and the use of SuDS.

Q54. What are your views on the Council's proposed spatial development strategy and proposed minimum targets for housing and employment growth?

SWT are very pleased to see a number of sites rejected in the HEELA due, in part, to their impact on Local Wildlife Sites (LWS). The NPPF and National Planning Practice Guidance is clear that LWS should be safeguarded in local plans with policies that protect them from harm and loss, and therefore SWT objects to any housing allocations on a LWS. We note that a number of potential allocations are adjacent to LWS and/or ancient woodland. Given that both these designations will be core areas within the Local Nature Recovery Strategy, it is vital that appropriate buffers are required for adjacent allocations and that the council is mindful of the potential for allocations to hinder recovery opportunities.

SWT is concerned about the potential impact of development to the west of Bexhill on the Pevensey Levels. Again, it is vital that appropriate buffers and stringent surface and wastewater drainage protocols are required. We are particularly concerned about increases in road surface runoff due to a cumulative impact of increased housing. This needs to be addressed strategically as it is often overlooked by individual applications.

Q71. What are your views on a potential 30-year vision for the A21 transport corridor?

SWT objects to the suggestion that new bypasses should be built along the A21. This is clearly contrary to the Green to the Core principle as new roads create large increases in greenhouse gas emissions and only encourage continued car use. This concept is particularly unsuitable given that the Northern Rother area is within the High Weald National Landscape.

Q90. What are your views on the Council's approach to strategic gaps and those that are identified?

SWT supports this policy.

Q92. What are your views on the Council's proposed policy on supporting health and wellbeing?

We support this policy, particularly point iii.

Q101. What are your views on the Council's proposed policy on green and blue infrastructure?

SWT supports the inclusion of this policy.

Q106. What are your views on the Council's proposed policy on the Combe Valley Countryside Park?

SWT supports this policy and particularly the requirement to deliver BNG within the park. The park is a valuable recreational resource to local communities and holds some very important places for wildlife that need to be protected and enhanced. In particular, the Countryside Park contains the Combe Haven SSSI which includes Sussex Wildlife Trust's reserve Filsham Reedbed, the park also connects down through Glyne Gap LWS to the Bulverhythe Shingle Beach and Cliffs LWS.

Q180. What are your views on the Council's proposed policy on trees, woodlands and hedgerows?

SWT supports the inclusion of this policy. However, we would like to see explicit requirements related to ancient woodland and veteran trees rather than just mention in the supporting text. The policy must make it clear that development leading to loss or harm to ancient woodland and/or veteran trees will be refused. It should also be made clear that adequate buffers are required and that these must be clear of any development or ancillary infrastructure.

Q184. What are your views on the proposed policy on water, coastal and flood risk management?

SWT supports the inclusion of this policy. We would like to see encouragement of the use of nature-based solutions when it comes to flood risk and coastal management. We also recommend that applicants within

the Pevensey Levels catchment are encouraged to undertake early discussions with the Pevensey and Cuckmere Water Level Management Board.

Q186. What are your views on the proposed policy on sustainable drainage?

SWT supports this policy and particularly the extra requirements in the Pevensey Levels catchment and the requirement for SuDs to be multifunctional.

Q191. What are your views on the Council's proposed policy on the Fairlight Cove Coastal Change Management Area?

SWT supports the inclusion of this policy. We hope that any consideration of coastal erosion data includes the most up to date climate change assessments.

Q194. What are your views on the Council's proposed policy on sites protected for their habitats and species?

SWT supports the inclusion of this policy, however it should be more explicit that development leading to loss or harm to designated sites, including Local Wildlife Sites, will be refused. Paragraph 185 of the NPPF is clear that local plans should 'identify, map and **safeguard** components of local wildlife rich habitats and wider ecological networks, including... locally designated sites.' Further to this, Planning Practice Guidance (Ref ID: 8-013-20190721) makes clear that 'National planning policy expects plans to identify and map these sites, and to include policies that not only secure their protection from harm or loss but also help to enhance them and their connection to wider ecological networks.' As it stands, draft policy ENV5 is not strong enough.

The policy should also be explicit that developments leading to the loss or harm of ancient woodland, veteran trees or other irreplaceable habitats will be refused. We do support the inclusion of the requirement for a buffer to ancient woodland, but would like to see this extended as it has been in the draft policy NE4 of the emerging Wealden Local Plan:

*'In the absence of site surveys and detailed assessments that demonstrate a 25m buffer is not required, the Council will assume a minimum buffer of 25m from the edge of the woodland, which allows for the presence of veteran trees and the fall height of mature trees.'*

Q196. Specifically, what are your views on the Council requiring an impact assessment for any development proposed within 25 metres of Ancient Woodland?

We support this requirement.

Q197. What are your views on the Council's proposed policy on the Sustainable Access and Recreation Management Strategy?

SWT supports the inclusion of this policy