



The countryside charity  
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18<sup>th</sup> May 2020

Dear Cllr Field

### **Consultation – Rother draft Environment Strategy 2020 – 2030**

This is the formal response of CPRE Sussex, the countryside charity, to Rother District Council's consultation on the draft Environment Strategy 2020-2030.

Generally, we welcome the creation of this Strategy. The threats posed by the climate emergency to our countryside and rural communities are profound. We have until 2030 to implement the action needed to limit global warming to 1.5 degrees. This will require global emissions to fall by 7.6% every year from now until 2030. A rise in temperature of even half a degree more than this would significantly increase the chances of droughts, floods and other extreme weather events. We all have a role to play in averting this catastrophe and it is excellent that Rother is showing leadership by setting a target to be a carbon neutral organisation and district by 2030, 20 years ahead of the national target, and by developing this Strategy to achieve that ambition.

Our detailed response is set out below;

### **General comment**

At times, the actions within the Strategy and accompanying Action Plan feel more like aspirations. It is hard to judge success against an action that is not SMART. It would be helpful

for actions to be concise and measurable and linked to an estimated carbon saving/ data analysis. This would also enable actions to be prioritised.

### **1. Becoming a smart digital district**

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

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

### **2. Green Economy**

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

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

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

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

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

### **3. Improving air quality**

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

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

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

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

Rye NP Policy T1 – Connectivity and Sustainable Transport:

Rye NP Policy E4 – Renewable and Low Carbon Energy:

Ticehurst NP Policy R4 – Develop Footpath and Cycle Networks

Ticehurst NP Policy INF3 – Community Energy Projects

Crowhurst NP Policy CF2 – Rights of Way

Robertsbridge NP Policy EC2 – Encourage home working

Robertsbridge NP Policy IN3 – Non-car provision

Robertsbridge NP Policy IN4 – Pedestrian safety

Robertsbridge NP Policy IN5 – Communications Infrastructure

Robertsbridge NP Policy IN7 – Sustainability

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

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

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

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

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

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

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

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

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

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

#### **4. Dealing with waste in more sustainable way**

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

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

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

Food waste is a subject which Rother has not so far tackled and should. It is best tackled by a joint effort with surrounding local authorities, particularly Hastings and Eastbourne to form a

consortium to collect food waste and use it in a locally located anaerobic digester to generate electricity.

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

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

## **5. Sustainable energy production**

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

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

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

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

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

## **6. Protecting biodiversity**

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

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

[http://sussexlnp.org.uk/wp-content/uploads/2020/03/Natural-Capital-Investment-Strategy\\_Summary\\_Feb2020.pdf](http://sussexlnp.org.uk/wp-content/uploads/2020/03/Natural-Capital-Investment-Strategy_Summary_Feb2020.pdf)

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

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

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

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

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

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

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

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

This action needs clarification:

‘We will support homes facing medium/high risk of flooding and encouraging flood resilience/ defence measures. We will review our Strategic Flood Risk Assessment.’

To read

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

## **7. Construction and existing buildings**

Success in this area will be a key indicator for the future as to whether Rother has succeeded in its aim. The Local Plan Review must therefore take radical steps to ensure that all new buildings are simply carbon neutral if both science and economics permit. The Government has not ruled out the ability for LPAs to go beyond building regulations when setting standards for energy efficiency, in fact the committee for climate change has encouraged the government to allow LPAs to go beyond the Future Homes Standard. The declaration of a climate emergency would justify such an approach by the council.

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

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

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.

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

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

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

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

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

## **8. Environmentally friendly council**

This theme has to permeate everything the Council does.

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

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

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

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

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

The action: 'We will require homes built on council owned land to be Passivhaus or similar, wherever possible' is too vague. The action should be 'We will require homes built on council owned land to be Passivhaus standard.' The action for council office accommodation is also too vague, what standards are referred to? This needs to be clear. For example, is this in relation to energy and water efficiency? What level is the target? What is the 'focus' for green spaces and tree planting in new build? When would this not be 'appropriate'?

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

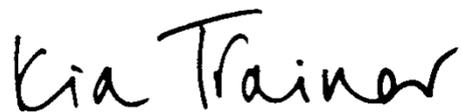
## **Resources**

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

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

We hope that you find these comments constructive.

Yours sincerely,

A handwritten signature in black ink that reads "Kia Trainor". The script is cursive and fluid, with the first letters of "Kia" and "Trainor" being capitalized and prominent.

Kia Trainor

Director, CPRE Sussex