

DEVELOPMENT AND SITE ALLOCATIONS LOCAL PLAN

SUBMISSION CONSULTATION STATEMENT

January 2019

Rother District Council
Town Hall
London Road
Bexhill-on-Sea
East Sussex
TN39 3JX

www.rother.gov.uk

This information can be available in large print, Braille, audiotape/CD or in another language upon request.

Please telephone: (01424) 787668

Email: planning.strategy@rother.gov.uk

- 1.1. This Consultation Statement supplements the earlier Proposed Submission DaSA Local Plan Consultation Statement published in September 2018 and sets out the number of representations made to the Proposed Submission DaSA Local Plan under Regulation 20, together with a summary of the main issues raised.
- 1.2. In addition, an up-to-date Schedule of Principal Activities in support of the Duty to Cooperate Statement contained at section 5 of the earlier Proposed Submission Consultation Statement is included following the summary of main issues.
- 1.3. The Proposed Submission DaSA, its accompanying Sustainability Appraisal and the associated supporting background papers were made available for the six week period for consultation in line with Regulation 19. The formal consultation period commenced on 26th October 2018, for a six week period, ending on 7th December 2018.
- 1.4. We consulted all the groups identified in the SCI (see Appendix 1) which included both the general and specific consultation bodies as required in Regulation 19. Each group/individual received a letter or email notification at the beginning of the consultation period, as did those individuals who had expressed an interest in the document¹ prior to its publication.
- 1.5. In order to notify as many people in the district as possible, a local advertisement notice was published in four local papers, setting out:
 1. A statement of the representations procedure
 2. A statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected.
- 1.6. These adverts were published in the following local papers (Copies of adverts at Appendix 2):
 - Bexhill Observer – 26th October 2018
 - Battle Observer – 26th October 2018
 - Rye Observer – 26th October 2018
 - Hastings and St Leonards Observer - 26th October 2018
- 1.7. As well as the formal advert, press releases were issued at the beginning of the consultation period. A copy of these made it into the local papers and is shown in Appendix 3.

¹ Prior to the consultation, the General Data Protection Regulation required us to obtain consent from individuals entered on our consultation database who had no representations logged against their name, in order to legally keep their records on the consultation database. Individuals who had registered an email address were automatically contacted through our on-line consultation system. Letters were posted to those individuals who did not have registered email addresses. Those who did not respond were then deleted from the database.

- 1.8. The DaSA, its accompanying Sustainability Appraisal and associated background papers was available on the Council's website, at the Community Help-Points in Bexhill and Rye, and was also made available at Battle Library. The documents, and the associated background papers, were also available to purchase on request. In addition, the consultation was also advertised on the scrolling banner across the Council's homepage.
- 1.9. In addition to the evidence which underpins the Core Strategy and that which was published at the Options and Preferred Options DaSA stage, a number of additional background papers/evidence studies were prepared by both consultants and in-house to inform the DaSA, including:
- Sustainability Appraisal of the Proposed Submission DaSA - Sept. 2018
 - Habitat Regulations Assessment of the Pre-Submission DaSA & emerging Neighbourhood Plans - Sept. 2018
 - Dungeness Complex, Sustainable Access & Recreation Management Strategy (SARMS) Oct. 2017
 - Rother Local Plan Viability Assessment - Oct. 2018
 - A Retail Capacity Study for Bexhill-on-Sea - Sept. 2018
 - Bexhill: Highways Capacity Assessment Report - Oct. 2018
 - Landscape Assessment of Northeys, Bexhill - Aug. 2018
 - Accessible and Adaptable Housing Background Paper - Sep. 2018
 - Space Standards Background Paper - Oct. 2018
 - Residential Garden Sizes Background Paper - Nov. 2017
 - Landscape Assessment of Wakeham's Farm, Fairlight Cove - May 2018
 - Sidley Sports Ground Feasibility Study - Aug. 2018
 - Drill Hall Historic Building Record & Heritage Assessment - Aug. 2018
 - Equalities Impact Assessment of the DaSA - Oct. 2018
- 1.10. These background paper/evidence studies are available on the Council's website – www.rother.gov.uk/Background-Evidence.

My Alerts

- 1.11. The Council offers a 'My Alerts' service which is a weekly email service providing information for Rother residents and businesses. The weekly My Alerts email contains information specific to residents' properties and surrounding area such as a reminder of bin collections or nearby planning applications, as well as useful news and events in the Rother area.
- 1.12. The My Alerts service was used to notify the Proposed Submission DaSA to circa 16,500 individuals registered for the service. Two notifications were sent out, one on the 26th October during the first week of the consultation, with a further reminder on 23rd November notifying that there were less than two weeks to make representations. The notifications that were sent out can be found in Appendix 4.

Ways to make comments during the consultation

- 1.13. The Council's website had a dedicated page relating to the DaSA Local Plan (www.rother.gov.uk/DaSA). All the documentation associated with the Proposed Submission stage was available to view and download from the website.
- 1.14. Comments on the Proposed Submission DaSA were invited to be submitted online, by email or letter. A representation form was also produced to assist interested parties in making representations on the Plan.
- 1.15. The on-line system enabled respondents (once registered) to make representations directly on any part of the DaSA or SA/SEA. Registered respondents could make further comments / representations at subsequent stages, and on later consultation documents, by simply logging onto the system using a password of their choice. Respondents can also view the comments/representations they have made by logging in.
- 1.16. The system also allows for all the representations made on a particular document or summaries of them, to be viewed via the website. It is not necessary to register on the system to view the comments/representations made by others.
- 1.17. The consultation under Regulation 19 is more formal than the previous consultation under Regulation 18, insofar as submitted representations form part of an independent examination in which the DaSA Local Plan will be assessed to determine if it is legally compliant and sound. In order to assist consultees to make the type of representations required at this stage, both the on-line system and the representation form provided for representations to be made specifically on matters regarding legal compliance and soundness.
- 1.18. We also produced accompanying on-line Guidance Notes, to explain the ways by which representations could be made. The guidance notes were also produced to assist consultees understand the technical elements of the Regulation 19 consultation stage, in respect of legality and soundness of the DaSA, ahead of its examination.
- 1.19. All the representations made at the Regulation 19 stage have now been published online through the Council's website (www.rother.gov.uk/DASA) in line with the provisions set out at Regulation 22. In addition, the other requirements set out at Regulation 22 will be undertaken shortly after Submission of the DaSA to the Planning Inspectorate.

Special arrangements for accessibility of Proposed Submission DaSA

- 1.20. The Proposed Submission DaSA was also available in alternative formats, if requested, including large-print. The Council's website also has an in-built document reading facility - ReadSpeaker – which allows the text on the website to be read out loud and provides assistance to those who have trouble reading text online.

What did the respondents say to the Proposed Submission document?

- 1.21. There was considerable response to the Proposed Submission consultation with 585 representations from 179 respondents², with just over 34% being representations of support with just under 66% are objections. Over 25% of the representations were made directly onto the on-line consultation system, a further 66% being sent in via email, with the remainder being made on paper forms or via letter. All comments made on the DaSA were input onto the online consultation system and are now available to view on-line.
- 1.22. The main issues raised through the consultation are set out below and are also available to view on the Council's website at www.rother.gov.uk/DASA.

Main issues identified at the Regulation 20 stage

- 1.23. The main issues raised through the Regulation 20 stage in terms of the level of response received were:
- Concern about the reliance on Neighbourhood Plans identifying sites in their respective neighbourhood areas,
 - Concern that the overall housing numbers are too low,
 - Concern over the proposed allocation of a number of sites, including:
 - BEX3c – Land east of Watermill Lane, Bexhill in respect of land proposed to be allocated for Gypsies and Travellers;
 - BEX9: Land at Spindlewood Drive, Bexhill in respect of the potential impact on the adjacent Pevensey Levels SAC/Ramsar, traffic on the A259 and local roads, the impact of SuDS and concern over the appropriate assessment.
 - FAC2 – Land east of Waites Lane, Fairlight in respect of potential traffic/highways impact and extension of the village into the AONB;
 - IDE1 – Land south of Elsmead, Iden in respect of the proposed access and the impact on existing residents;
 - PEA1 – Land south of Main Street, Peasmarsch in respect of access and drainage;
 - A number of omission sites were put forward as alternatives to the proposed sites in a number of the villages.
- 1.24. Detailed summaries per chapter of the DaSA are set out below.

² It should be noted that a number of individuals are represented by more than one agent in respect of representations made on Policy PEA1.

CHAPTER 1. INTRODUCTION

Issue Area	Views expressed in representation
Policies Map	Housing allocation detail maps show indicative layouts but these may need to be adapted depending on the ecological constraints and opportunities (East Sussex County Council).
	Either the safeguarded minerals and waste sites should be included on the Policies Map, or reference to the Waste & Minerals Policies Map should be made on the Rother Policies Map (East Sussex County Council).
Regard to other plans/ policies	The DaSA excluding those areas subject to Neighbourhood Plans (NPs) means it is seriously flawed as it doesn't provide comprehensive Development Management or Site Allocation policies for the entire district and makes no contingency arrangements in the event a NP is not made.
	Welcome the reference to the National Planning Policy for Waste (East Sussex County Council).
	Request reference is made to the safeguarding of minerals sites, wharves and railheads, or to relevant Waste & Minerals Plan policies in paragraph 1.16 (East Sussex County Council).
	Tunbridge Wells Borough Council has engaged in joint discussions under the Duty to Cooperate and would welcome further discussion (Tunbridge Wells Borough Council).
Layout	Page numbers should be provided for the individual policies and inset maps. Further references should be provided in the appendices for Core Strategy and 2006 Local Plan policies.
Representation Form	Pre- populating the representations form in a way that is favourable to the Council is maladministration.

CHAPTER 2. RESOURCE MANAGEMENT

Issue Area	Views expressed in representation
Policy DRM1 – Water Efficiency	Support the policy (Rye Town Council, Northiam Parish Council).
	Requirements for water efficiency measures for industrial and commercial developments should be included. Commercial developments should be required to meet BREEAM “excellent” or “very good” (minimum). Other LPAs have included policies requiring such standards (Environment Agency, Salehurst & Robertsbridge Parish Council).
	The policy is unnecessary as it will be implemented through the Building Regulations. It should be deleted.
	Proposals do not go far enough, given existing water shortages and likely effect of climate change (Burwash Parish Council).
Policy DRM2 – Renewable Energy Developments	Support the policy (Rye Town Council, Northiam Parish Council).
	Rye Harbour has potential for wind turbines and biomass. Solar panels could be fitted to large buildings (Rye Town Council).
Wind turbines	Support Policy DRM2 but we are disappointed that no suitable areas for large-scale wind turbines have been identified (Hastings Borough Council).
	Support no large wind turbines in the Strategic Gap/ Combe Valley Countryside Park.
Biomass	There is insufficient local woodland to support sizeable biomass units.
	There should be positive encouragement for use of local biomass and wood fuel (Salehurst & Robertsbridge Parish Council).
	Ancient woodland does have some potential as a source for biomass energy as it requires ongoing management (ESCC).
Policy DRM3 – Energy Requirements	Support the policy (Rye Town Council, Northiam Parish Council).
	Policy is onerous and unnecessary. It could lead to best practice energy efficiency techniques being dismissed for not being renewable or low carbon.
	Core Strategy Policy SRM1 requirement for an energy strategy is onerous and should be reviewed.
	The threshold should be lowered to 50 dwellings or 5,000 sqm of commercial space (Salehurst & Robertsbridge Parish Council).
	It is advantageous to site renewable technologies involving biomethane near existing gas infrastructure (Southern Gas Networks).

CHAPTER 3. COMMUNITIES

Issue Area	Views expressed in representation
Policy DCO1 – Retention of sites of social and economic value	Support the policy (Rye Town Council, Northiam Parish Council)
	It is important that new housing developments do not lead to loss of amenities and job opportunities as these will be needed by the new occupants.
	“Cultural facilities” should be added to the scope of uses to which the policy applies. This would be consistent with the NPPF (2018).
	Add wording to the end of part (i) of the Policy: “...at a realistic valuation of the site/premises for that use, <u>without development potential</u> ” to ensure that valuations are not unnecessarily inflated.
	Policy appears to also cover employment uses and as such unnecessarily duplicates Policies EC3 of Core Strategy and DEC3 of the DaSA. Policy should be refined or a cross-reference made to DEC3.
	Policy should refer to potential opportunities for achieving enabling development to secure the retention/ improvement of community facilities.
Policy DCO2 – Equestrian Facilities	Support the policy (Northiam Parish Council, Rye Town Council).
	Policy is too restrictive.
	Equestrian developments should not be allowed where access for horse boxes will be along narrow lanes.
	RDC should work with ESCC to improve the public bridleway network (Salehurst & Robertsbridge Parish Council).
	A full Non-Motorised User policy, to include equestrians, should be added.
	The suggestion of one hectare per horse is overly cautious and doesn’t accord with British Horse Society guidance.

CHAPTER 4. HOUSING

Issue Area	Views expressed in representation
Policy DHG1 – Affordable Housing	Support the policy (Northiam Parish Council, Rye Town Council)
	The overall number of housing allocations should be increased, to enable the delivery of more affordable housing.
	More detail should be provided on “in-lieu contributions” when part of an affordable housing unit is required.
	The NPPF (2018) states that no affordable housing should be sought for residential developments that are not “Major” (i.e. 10 or more dwellings), and the PPG confirms this. Therefore, the thresholds in the policy should be amended to comply.
	It is unclear why the minimum size of developments in rural areas requiring affordable housing has increased from 5 to 6 dwellings (Burwash Parish Council).
	The type of affordable housing provided through developments should be reviewed as currently they do not provide for young working families on low incomes (Burwash Parish Council).
	The policy should reflect the new NPPF (para 57) and PPG on viability. All viability reports should be published with no redactions (Salehurst & Robertsbridge Parish Council, Burwash Parish Council).
	The wording “expect” is not strong enough (Salehurst & Robertsbridge Parish Council).
	Figure 1 (House price to earnings ratio) should be further broken down into different parts of Rother to assess the problems of affordability better (Salehurst & Robertsbridge Parish Council).
	Affordable housing should be for local people.
Policy DHG2 – Rural Exception Sites	Support the policy (Northiam Parish Council).
	The requirement for development to not significantly harm biodiversity should be added to point (vi) of the policy (East Sussex County Council).
	There shouldn’t be a need for market sales to enable exception sites as land is already coming forward at lower than market rate (Burwash Parish Council).
	Criteria (iv) is welcomed but a “modest” amount of enabling open market housing may not be sufficient. AiRS notes examples of 70% market and 30% affordable (Salehurst & Robertsbridge Parish Council).
	Exception sites are too restrictive and biased towards affordable housing, thereby prejudicing developments without affordable housing such as appropriate infill developments outside

	development boundaries.
Policy DHG3 – Residential Internal Space Standards.	Support the policy (Northiam Parish Council, Rye Town Council).
	Insufficient evidence that the standard is necessary.
	The standard could adversely impact on the deliverability of small starter homes.
Policy DHG4 – Accessible and Adaptable Homes	Support the policy (Northiam Parish Council, Salehurst & Robertsbridge Parish Council, Rye Town Council).
	Insufficient evidence that the adoption of the standards is necessary, and insufficient evidence on the scale of the need in Rother. Many older people will find the higher accessibility standard in M4(1) sufficient.
	Allocations, particularly in rural areas, should be based on the actual need of those people who already live /work in the area, not for an influx of new residents.
	Some bungalow accommodation for older people should be a requirement on every scheme of 5 or more dwellings (Burwash Parish Council).
	Access to new housing developments for all groups of people needs to be properly considered.
Policy DHG5 – Specialist Housing for Older People	Support the policy (Northiam Parish Council, Rye Town Council).
	The policy should be more definitive and include specific criteria (Salehurst & Robertsbridge Parish Council).
Policy DHG6 – Self-build and Custom-build Housebuilding	Support the policy (Northiam Parish Council, Rye Town Council).
	The policy is contrary to national policy. The PPG says local authorities should use their own land, engage with landowners and work with developers to maximise opportunities. It would be contrary to national policy to enforce a percentage of plots when guidance encourages a more co-operative process.
	There is insufficient evidence of demand to support the requirement.
	The requirement will lead to an over-provision of plots and slow the rate of site delivery, or prejudice sites coming forward at all.
	The Council's evidence shows most people want a detached house in a countryside location, this will not be delivered through the policy.
	How will the visual impact of a development be assessed if part of a site is left as serviced plots? No evidence that a design code would overcome the issue.
	There is no policy commitment for a design code.
	The policy should be amended to include only the first paragraph.

	The threshold should be raised from 20 dwellings to 50, given the current market for self-build.
	It might be better to require a proportion of the site area (sqm) to be self-build (Salehurst & Robertsbridge Parish Council).
Policy DHG7 – External Residential Areas	Support the policy, including the requirements for cycle storage and waste and recycling storage (Northiam Parish Council, Rye Town Council, Salehurst & Robertsbridge Parish Council, East Sussex County Council).
	Part (i) of the policy should be strengthened to require external space to contribute positively to the district's green infrastructure network, in accordance with National Policy and Policy EN5 of the Core Strategy.
	Rather than require rear gardens to be at least 10m long, a minimum area figure should be used instead to allow developers more flexibility to deliver sufficient amenity space. A 10m long garden cannot always be delivered.
Policy DHG8 – Extensions to Residential Gardens	Support the policy (Northiam Parish Council, Rye Town Council).
Policy DHG9 – Extensions, Alterations and Outbuildings	Support the policy (Northiam Parish Council, Rye Town Council, Historic England).
	The size of extension allowed should be limited, this is particularly pertinent to smaller dwellings to ensure they remain in a lower price bracket and affordable for local people. There should be a policy requirement for extensions not to result in the loss of a small dwelling, as in the South Downs National Park Authority's policy (Burwash Parish Council, Salehurst & Robertsbridge Parish Council).
Policy DHG10 – Annexes	Support the policy (Northiam Parish Council, Rye Town Council).
Policy DHG11 – Boundary Treatments	Support the policy (Northiam Parish Council, Rye Town Council, Historic England).
	The policy should be amended to require boundary treatments to maintain/ increase permeability for wildlife.
Policy DHG12 – Accesses and Drives	Support the policy (Northiam Parish Council, Rye Town Council).
	The policy should include a requirement to manage rainwater run-off.
	The policy fails to address the problem of the loss of on-street parking spaces caused by new accesses/driveways in areas of parking stress (Salehurst & Robertsbridge Parish Council).

CHAPTER 5. ECONOMY

Issue Area	Views expressed in representation
Policy DEC1 – Shopfronts, Signage and Advertising	Support the policy (Northiam Parish Council, Rye Town Council, Historic England).
	The extent of permitted development rights for advertising/ signs could be at odds with the thrust of the policy.
	Permitted development rights for advertising/ signs should be suspended in Conservation Areas.
	Highways England does not allow advertisements within the highway boundary; this is relevant to the A259 and A21 (Highways England).
Policy DEC2 – Holiday sites	Support the policy (Northiam Parish Council, Rye Town Council, Salehurst & Robertsbridge Parish Council).
	Criteria (i) (first limb) should be amended to include reference to the High Weald AONB Management Plan (Natural England).
	Criteria (ii) (first limb) should be amended to require habitats and species to be conserved <u>and</u> enhanced (Natural England).
	In criteria (iii) (b) (second limb), the meaning of the term “a natural boundary” is unclear.
Policy DEC3 – Existing employment sites and premises	Support the policy (Northiam Parish Council, Rye Town Council).
	The policy should only relate to how existing employment sites can be used for employment purposes. Criteria (iv) should be deleted.
	Sites allocated for residential-led redevelopment in Neighbourhood Plans should not be subject to the tests in Policy DEC3 and this should be noted in the DaSA.
	The “cascade requirements” originally in Core Strategy EC3 and repeated in part (iv) of this policy should have been reviewed. If employment use is demonstrated not to be viable it is unlikely that community use would be. Affordable housing should be deleted as this would be triggered in any event by Policy DHG1. Market housing should not have to be “subject to local needs”.
	The policy doesn’t relate to the supporting text. “Existing sites” are not shown on the Policies Map.
	A specific time period for marketing should be required, suggest 18 months (Salehurst & Robertsbridge Parish Council).
	The wording in criteria (ii) should be changed to require proposals to accord with other relevant Policies rather than “have regard to”.

CHAPTER 6. ENVIRONMENT

Issue Area	Views expressed in representation
Policy DEN1 – Maintaining Landscape Character	Support the policy (Northiam Parish Council, Rye Town Council).
Policy DEN2 – The High Weald AONB	Support the policy (Northiam Parish Council, Rye Town Council).
	It is important that development does not adversely affect the AONB through visual intrusion, noise or light pollution.
	Reference should be made to the importance of maintaining the natural and historic character of the AONB.
	The reference to “Valued landscapes” in paragraph 6.11 should be deleted as case law confirms that designated landscapes do not necessarily amount to “valued landscapes” having regard to the NPPF.
	No definition of “small scale” is given.
	The policy leaves unacceptable holes that will be exploited by developers and is contrary to the NPPF, in particular in terms of the definition of “major development” (Burwash Parish Council).
	The policy should be amended to refer to “scenic natural beauty” as the term “scenic beauty” does not encompass the biodiversity element of natural beauty.
	The words “seek to” should be deleted from the policy. (Natural England).
Policy DEN3 – Strategic Gaps	Support the policy (Rye Town Council).
	The policy should be expanded to refer to the contribution the strategic gaps do and could make to green infrastructure and natural capital.
	What constitutes “exceptional circumstances” should be clarified (East Sussex County Council).
	Text should be added to acknowledge the existing strategic waste facilities within the strategic gap between Bexhill and Hastings/ St Leonards, as identified in the adopted Waste & Minerals Plan (WMP). The policy as drafted could undermine the ability of the WMP to make the most efficient use of these waste sites (East Sussex County Council).
	The Bexhill and Hastings/ St Leonards Gap should be extended.
	The Strategic Gaps severely restrict the potential for sustainable development, having regard to the increasing housing need.
	A review of strategic gaps should form part of the review of the Core Strategy, using up to date housing needs figures, rather than the DaSA.

	There is no justification to delete the gap between Battle and Telham.
	The policy should include important gaps between villages in the rural areas (Burwash Parish Council).
	There is no justification to enlarge the gap between Hastings and Fairlight.
	The Council's position in relation to householder development and replacement dwellings within strategic gaps needs to be clarified.
Policy DEN4 – Biodiversity and Green Space	Support the policy (Northiam Parish Council, Rye Town Council).
	Wording should be added to confirm that development will not be permitted (included in allocated sites) if it would adversely affect the integrity of an internationally designated site. At present the SARMS gives insufficient protection as it has not been adopted and there is no implementation plan. Effects from development on the Pevensey Levels cannot be determined until project-specific stage.
	The policy wording should be strengthened to require development to produce net gains for biodiversity. The wording "seek to" should be deleted from criteria (ii). Part (iv) should require smaller developments to deliver towards the green infrastructure network. Part (v) is unclear in its requirements. It should require all developments that will increase residents within the Strategy area to contribute towards delivery of the SARMS.
	Item (ii) could be even stronger (Salehurst & Robertsbridge Parish Council).
	The policy should require ecological surveys and reports for all developments.
	A 15 metres buffer between development and ancient woodland should be a policy requirement.
	Minor wording changes requested to paragraph 6.43 to confirm surveys will be required where the development <u>may</u> have impacts, including on notable species (East Sussex County Council).
	Minor wording changes requested to refer to Habitats and Species of Principal Importance (East Sussex County Council).
	Minor wording changes requested to delete reference to East Sussex County Council from paragraph 6.43 (East Sussex County Council).
	Reference to protected species should be included in part (ii) of the policy (Environment Agency).
Policy DEN5 – Sustainable Drainage	Support the policy (Rye Town Council).
	Parts (v) and (vi) of the policy should be strengthened to ensure no significant effect on the Pevensey Levels SAC in terms of hydrology, including in the event of failings in the management of the SuDS. The policy should require a specialist management company to be in place prior to occupation with step-in rights for the Local Authority.

	Welcome the wording within part (iv) to include multi-functional delivery of objectives, however it should be strengthened through the inclusion of more detailed examples/ prompts within the wording.
	SuDS should be linked up wherever possible to achieve greater benefits for water management and wildlife, to contribute to green infrastructure and support robust ecological networks (Natural England).
	Supports the policy but all new watercourses should be required to be open, and “daylighting” existing culverts should be a policy requirement (Northiam Parish Council).
	Highways England has strict controls on rainwater run-off into its highway drainage systems (Highways England).
	Under item (i) a developer should be required to provide 12 months’ groundwater monitoring data (Salehurst & Robertsbridge Parish Council).
	The policy should include specific reference to the need to protect the Combe Valley Countryside Park.
	The Lead Local Flood Authority recognises it is not a requirement for the DaSA to be supported by an updated Strategic Flood Risk Assessment but would wish to state that this will be required when the Core Strategy is reviewed (East Sussex County Council).
Policy DEN6 – Land Stability	Support the policy (Northiam Parish Council, Rye Town Council).
	While we warmly welcome the policy, it fails in one respect: the policy should remove Permitted Development rights for householder development near the cliff edge at Fairlight (Fairlight Parish Council).
Policy DEN7 – Environment Pollution	Support the policy (Northiam Parish Council, Rye Town Council).
	References to “contaminated land” in the policy and supporting text should be changed to “Land Contamination” as the former has a specific definition under Regulations (Environment Agency).
	Explicit reference should be made the need to avoid disturbance to underlying waste and the associated potential hazards, in the Combe Valley Countryside Park area.

CHAPTER 7. IMPLEMENTATION

Issue Area	Views expressed in representation
Policy DIM1 – Comprehensive Development	Support the policy (Rye Town Council).
	Policy needs to be clarified as to where and how it is applied (Northiam Parish Council).
Policy DIM2 – Development Boundaries	Support the policy (Northiam Parish Council, Rye Town Council).
	Development boundaries are already out of date due to the District's shortfall in housing supply and therefore, development boundaries across the whole district should be reviewed with a view to increasing land available for housing.
	The final paragraph of the policy should be deleted and replaced with a criteria based policy for edge of settlement development, similar to that within the emerging Ashford Local Plan.
	The DaSA is seriously flawed as it does not make it clear that Development Boundaries are removed from around some settlements. There is no justification for removing the Boundaries from around Pett Level or Winchelsea Beach.

CHAPTER 8. OVERVIEW

Issue Area	Views expressed in representation
Development targets	Support the development targets identified (Rye Town Council).
	With reference to the margin of over-provision of homes proposed, the transport evidence should examine the maximum that sites can be developed to without unacceptable impacts on the strategic and local road networks or the points at which there is a requirement for mitigation to bring about a “nil detriment” (Highways England).
	Based on the strategy presented it is considered there would be no overall significant or direct effect on the area comprising Tunbridge Wells borough (Tunbridge Wells Borough Council).
	Geographical and economic analysis should be used in deciding where to build new houses rather than leaving it to a system of arbitrary targets (shown by Figure 17). The current system ends up targeting rural or semi-rural areas resulting in new car-based estates, contrary to the NPPF’s promotion of healthy lifestyles and active travel. Allocating sites while taking no account of local infrastructure, employment opportunities and services is wrong.
	Figure 17 includes a reference to 58 dwellings from large sites in Northiam, however this planning permission is not coming forward and therefore the figure should be 0.
	In Figure 17 the figure for large site requirements should be increased by 20% to address the historic undersupply and the properly assessed housing need for the District.
Meeting housing targets	The plan should acknowledge that in avoiding areas of flood risk and ensuring appropriate drainage, the quantum of growth set within individual allocation policies may need to be reduced in some instances, therefore, suggest the terms “approximately” or “circa” are used prior to the stated amount of residential development (East Sussex County Council).
	The reliance on Neighbourhood Plans to deliver the “balance” of development required and a buffer is not sound.
Policy OVE1 – Housing supply and delivery pending plans	Support the policy.
	The section which suggests planning applications will be favourably considered until such time a Neighbourhood Plan (NP) is in force could encourage developers to rush through planning applications in order to pre-date NPs, and should be deleted (Burwash Parish Council).
	The policy creates a degree of uncertainty. RDC should seek to plan for the full Core Strategy requirements, with a sufficient overprovision to account for the historic undersupply and for sites that do not come forward or under-deliver. Further sites should be allocated in the DaSA.

	<p>The Objectively Assessed Need (OAN) for housing that the Core Strategy is based on is out of date. The housing requirement has not been kept under review, as required by the Core Strategy Inspector. It is clear the LPA is supplying a significant amount of dwellings below their current OAN. Housing provision needs to significantly increase in all settlements across the district and a 20% buffer onto the 5 year housing land supply is required due to the persistent under-delivery of housing, meaning the total in Policy OVE1 should be increased from 5,700 to 6,840. Policy OVE1 is unsound as it does not meet the development need, is contrary to national policy, and the evidence base is out of date.</p>
--	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

CHAPTER 9. BEXHILL

Issue Area	Views expressed in representation
Context	Limited retail investment and high business rates do not support town centres.
Development Provisions and Development Boundary	Land at Clavering Walk should be allocated for up to 99 homes and the settlement boundary revised to include the site.
	Support the policy as it is important that Sidley sports ground is retained for recreational use and not for housing.
	Support para. 9.14 as it acknowledges the importance of facilities in Sidley
	Land at Sandhurst Lane, Bexhill (Pond Field) should be allocated for residential development.
	Paragraphs 9.18 and 9.19 should be modified to reflect appeal decision APP/01430/W/17/3191063 which granted outline planning permission for residential development south of Barnhorn Road. Sites granted permission beyond the base date of the DaSA are included as allocations (e.g. BEX1), so this site should also be included as a housing site and within the development boundary.
Policy BEX1: Land at Levetts Wood and Oaktree Farm, Sidley, Bexhill	Support criteria (iv) and (vii) but the policy should require a buffer of at least 15metres between the development and ancient woodland.
	BEX1,BEX2, BEX3a, BEXb and BEX3c should be considered holistically to take account of the ecosystems being provided by these areas.
	BEX1,BEX2, BEX3a, BEXb and BEX3c should be considered in terms of green infrastructure provision and a green infrastructure strategy for these sites should be developed.
	Development boundary drawn too tightly to the northern side of NBAR which would create a number of constrained fields too small for commercial or agricultural use.
	Development boundary is in conflict with policies GD1 and DS1 of the Local Plan and Policy OSS2 of the Core Strategy.
	Should be noted that the NBAR is the natural gravity drainage corridor for Southern Water's foul drainage.
	Land north of NBAR should be identified for mix of employment, leisure and sports facilities.
	Object to the land between NBAR and Coombe Valley being in the strategic gap as this is suitable for employment and development is already restricted by Combe Haven SSSI, the AONB and Pevensey Levels SAC.

	Policy seeks to impose restrictions beyond those already determined at outline planning permission stage- (RR/2017/2181/P).
	Policy places unrealistic obligations on the developer. Suggest removal of all obligations to work with Southern Water to deliver sewerage infrastructure - there is no planning justification to rely on this provider.
	The planning permission includes B2 use but the policy states that development will be predominantly falling within Class B1.
Policy BEX2: Land at Preston Hall Farm, Sidley, Bexhill	Support criteria (iv) and (vii) but the policy should require a buffer of at least 15metres between the development and ancient woodland. New policy wording suggested.
	We are satisfied that there are sufficient references in BEX2 (v), alongside Core Strategy Policies, to protecting and enhancing historic character and heritage assets. (Historic England)
Policy BEX3: Land at North Bexhill – Infrastructure	Support the policy
	BEX3 should also refer to Policies BEX1 & BEX2 as they are functionally linked to BEX3a, b & c.
	The strategic approach to the creation of ecological networks and green infrastructure should be included within the policy and applied more widely.
	The policy context should be re-worded to ensure that it is clear that 'nil detriment' (no worse than otherwise) is provided where the cumulative impact is 'severe' i.e. the network is taken or is already over capacity (Highways England).
	It should be noted that works to the SRN will be via a Section 278 of the Highways Act 1980 agreement and not a Section 106 of The 1990 Town & Country Planning Act agreement (Highways England).
	Policy BEX3c imposes a traffic calming requirement (criteria iii b) but Policy BEX3b doesn't. A minor modification should be made to Policy BEX3 and BEX3c, in that the criteria in Policy BEX3c (iii) (b) regarding traffic management is deleted from BEX3c and is instead written into the shared infrastructure policy (Policy BEX3) (East Sussex County Council).
Policy BEX3a: Kiteye farm and adjoining land	Land west of Ninfield Road should be included within the allocation – no clear justification for its removal.
	The policy should specifically require a 15m buffer to the adjacent ancient woodland.
	The land proposed to be allocated for playing fields would be better utilised as additional housing within the policy area.
Policy BEX3b: Land west of	The policy should specifically require a 15m buffer to the adjacent ancient woodland.

Watermill Lane	Policy BEX3c imposes a traffic calming requirement (criteria iii b) but Policy BEX3b doesn't. A minor modification should be made to Policy BEX3 and BEX3c, in that the criteria in Policy BEX3c (iii) (b) regarding traffic management is deleted from BEX3c and is instead written into the shared infrastructure policy (Policy BEX3) (East Sussex County Council).
	The land proposed to be allocated for playing fields/open space would be better utilised as additional housing within the policy area.
	The proposed footpath crosses Mayo Rise which is privately owned and would require the removal of some trees. Mayo Rise onto Ninfield Road is an accident blackspot.
	The amount of housing proposed will have an impact on horse owners in the area through the loss of grassland.
	Sidley does not have the infrastructure to cope with the proposed housing.
Policy BEX3c: Land east of Watermill Lane	Policy BEX3c imposes a traffic calming requirement (criteria iii b) but Policy BEX3b doesn't. A minor modification should be made to Policy BEX3 and BEX3c, in that the criteria in Policy BEX3c (iii) (b) regarding traffic management is deleted from BEX3c and is instead written into the shared infrastructure policy (Policy BEX3) (East Sussex County Council).
	Sidley does not have the infrastructure to cope with the proposed housing.
	Loss of wildlife and countryside is detrimental to wellbeing of those in the area.
	Object to the siting of a traveller site in this location.
	The traveller pitch area is needed for NBAR landscape mitigation.
	Movement of caravans will affect traffic flow.
	The traveller site is bounded on three sides by separate land ownership.
	The allocation does not give a timescale for provision and as such there is no commitment to provide a 5 year supply of traveller pitches.
	Watermill Lane is unsuitable for use by large vehicles and caravans.
	The siting of a traveller site here would not meet the needs of travellers.
	Public consultation has been inadequate.
	The plans are very poor.
	If the site will have no visual impact why would planting be required?
	The site is too close to existing and proposed housing and will cause conflict with residents.
	Clearing rubbish would be a burden on the Council's finances.
	Possible anti-social behaviour and crime.

	The site will put extra strain on schools and health services.
	Allocating a traveller site to cover the entirety of a single ownership would be detrimental to viability of delivery of the development.
	Support the allocation, although land to the north of NBAR should also be included for a further 25 units and a cricket pitch/pavilion.
	The accompanying map is incorrect, does not show the access road and roundabout. The farm track is unclear.
	A transport assessment should have been undertaken as part of the process.
	The map should include NBAR.
	The proposed access points are not appropriate.
	The pedestrian/cycleway links are not appropriate.
Policy BEX4: Land at Former High School Site and Drill Hall, Down Road, Bexhill	Agree with point (v) regarding transport assessment. We recommend that there should be a master plan/design brief as the uses are specific. Sustainable transport/connectivity should be a key feature. The main impact will be on the trunk road (East Sussex County Council).
	We are satisfied that there are sufficient references in BEX4 (vi), alongside Core Strategy Policies, to protecting and enhancing historic character and heritage assets (Historic England).
	The need remains for recognition that there is limited waste water capacity at this site at the “practical point of connection” and this could lead to an increased risk of flooding. Proposed amendment to policy BEX4 in line with NPPF and PPG to include “(ix) occupation of the development is phased to align with the delivery of sewerage infrastructure, in liaison with the service provider” (Southern Water).
	A hotel in the Bexhill seafront cultural area or south of the railway line would be more appropriate.
	The size of the hotel should take into consideration the impact on existing holiday accommodation.
	Will there be doctors’ surgeries available for new residents?
	Access on Downs Road is very narrow and is a safety hazard to school pupils and vehicles, particularly during construction.
Policy BEX5: Land at Gullivers Bowls Club, Knole Road, Bexhill	We are satisfied that there are sufficient references in BEX5 (v), alongside Core Strategy Policies, to protecting and enhancing historic character and heritage assets (Historic England).
	It is not clear why this is allocated for sheltered housing. Policy BEX8 is more suitable.
	Policy is not robust and should be altered to read “(i) some 40 flats are provided of which 30% are

	affordable (v) the design of the scheme with a maximum of 4 storeys should be of the highest architectural quality.”
	The inclusion of the only open green space to the east of the town should not be considered for residential development.
	RDCs 2006/2007 Open Spaces, Sport and Recreation study highlights Knole Road Bowling Greens as having high value to the district and the Bexhill Local Action Plan was incorporated into the Core Strategy.
	With regard to 9.67, the NPPF seeks to ensure flood risk is not increased as a result of development and the suggestion that Knole Road could be developed with a number of hereditaments opposite the listed terrace with basements is a contradiction. Loss of green space would impair surface water drainage in an area with frequent cellar flooding.
	Paragraph 9.64 fails to state that the land is greenfield and therefore, it should be removed from the DaSA. The club is financially viable. During 2018, repairs and improvement works have been carried out.
	Paragraph 9.68 is factually wrong and misleading – the Judicial Review did not remit the decision back to the council. The sentence in brackets should say “although following a successful Judicial Review the decision was quashed”.
	Inclusion of the site contradicts policy EN5 of the Core Strategy.
Policy BEX6: Land adjacent to 276 Turkey Road, Bexhill	We are opposed to the demolition of Cemetery Lodge and seek the deletion of the final sentence of para. 9.72.
	Policy includes requirements to provide off-site highway works to make the development acceptable in highway terms. Should be noted that combined, BEX6, BEX9, BEX10 and BEX11 may have a cumulative impact of the SRN and may be required to contribute toward improvements on the wider road network (Highways England).
	With regard to the Pevensey Levels, the requirement to carry out an AA that demonstrates beyond reasonable scientific doubt that proposals can be delivered without harming the integrity of the Pevensey Levels should be applied to this site (as done with Policy BEX9 and BEX10).
Policy BEX7: Land at Moleynes Mead, Fryatts Way, Bexhill	With regard to the Pevensey Levels, the requirement to carry out an AA that demonstrates beyond reasonable scientific doubt that proposals can be delivered without harming the integrity of the Pevensey Levels should be applied to this site (as done with Policy BEX9 and BEX10).
Policy BEX8: Land south of	Support the policy.

Terminus Road, Bexhill	RDC and potential developers should be made aware of and consider Network Rail's standard guidelines and requirements when developing sites located adjacent to or in close proximity to Network Rail's land, assets and operational railway infrastructure (Network Rail).
Policy BEX9: Land off Spindlewood Drive, Bexhill	Policy includes requirements to provide off site highway works to make the development acceptable in highway terms. Should be noted that combined, BEX6, BEX9, BEX10 and BEX11 may have a cumulative impact of the SRN and may be required to contribute toward improvements on the wider road network (Highways England).
	For BEX9, the existing access onto Barnhorn Road should be upgraded and an access provided on the local road network. This is necessary to avoid 'severe' impact to Little Common Roundabout (Highways England).
	Insufficient space at the existing access off Barnhorn Road to reduce traffic at the roundabout.
	Space from front gardens would be needed from other properties along Barnhorn Road to construct the roadway.
	The plans and details submitted under RR/2017/1705/P are inaccurate in terms of the new entrance.
	Danger around the site entrance together with the ghost lane and S bend for cars, pedestrians and cyclists. In particular, these properties' driveways would be affected causing clear highway safety issues. High volumes of traffic would exacerbate this.
	The Highways own guidelines have been ignored. In terms of (ii), Highways England should not relax their guidelines.
	The proposal to re-align the Meads Road Entry reduces the sight line, making this more dangerous.
	Surrounding roads including unadopted roads are unsuitable for heavy traffic. Who will pay for their upkeep?
	Development will create a rat-run for traffic along narrow/unadopted roads with no footpaths/verges.
	The proposal should not be considered until all other current developments have been completed so the full highway implications can be taken into account.
	There will be increase in traffic and associated noise and air pollution.
	In terms of 9.102, figure 29 should reflect the actual application area including land either side of the access road.
	The effect of the development on Pevensey Levels RAMSAR SSSI SAC is inevitable, long term

	and mitigation measures will fail.
	Regarding (xi) a competent authority must take account measures intended to avoid or mitigate harmful effects of a plan as part of an appropriate assessment. The Environment Agency and Natural England state that there is insufficient information to infer that there will be no likely significant impact.
	In light of the People over Wind Court of Justice European Union (CJEU) judgement, reliance on mitigation measures at the likely significant stage is now vulnerable to legal challenge.
	The site should not be included as an appropriate assessment has not been provided or approved in accordance with the Habitats Regulations.
	In terms of (xii) a road should not run through the wildlife corridor.
	Specific steps are needed to enforce lighting guidance in areas such as the Pevensey Levels and bordering areas.
	Concerns regarding how the pond would be affected without rainfall and after rainfall, including overflow and impacts on surrounding water courses, Cole Stream, and fluvial ecosystem of the Pevensey Levels.
	SuDS scheme insufficient as advised by the EA and does not take into account climate change.
	Policy does not specifically include binding legal agreements for maintenance of SuDS over the lifetime of development.
	The site and surroundings regularly flood.
	In terms of point (xiii) it would be visually obtrusive and overbearing and result in overlooking/loss of privacy. Loss of view is unquestionably a material planning consideration.
	Lack of space between properties and roads means minimal planting/screening.
	This will increase pressure on all services e.g. schools, doctors, waste, water, roads.
	Policy does not specifically include ensuring that no pollution leaves the site during construction.
	Adverse impact on the setting of the historic medieval farm complex Barnhorn Manor.
	The land should be retained as farmland.
	BEX9 is not required as the DaSA exceeds the required housing target, especially given that large windfall sites are excluded.
	We need smaller sites and to provide more housing suitable for over 65s.
	The development would be unsustainable.
	Presumption in favour of sustainable development does not apply to this site.

	All aspects of the allocation have been addressed in the application and it is fully deliverable.
Policy BEX10: Land at Northeye (Former UAE Technical Training Project), Bexhill	While this allocation is not considered to be sustainable, we do not object to the principle of the allocation. We wish the development to make improvements to sustainable transport measures as well as seeking measures that minimise private car use. Request modification to the policy to require a travel plan to be submitted and approved by ESCC. Request amendment to (vii) as we would wish to see bus stop improvements, widening of footways and an improved crossing point (East Sussex County Council).
	Policy includes requirements to provide off site highway works to make the development acceptable in highway terms. Should be noted that combined, BEX6, BEX9, BEX10 and BEX11 may have a cumulative impact of the SRN and may be required to contribute toward improvements on the wider road network (Highways England).
	Loss or prejudice of the use of a playing field would be strongly resisted. The potential for a cricket or football pitch should be justified by a Playing Pitch Strategy as it is often the case that single pitch sites are unsuitable and there can be issues finding clubs/tenants to take them on.
	Perhaps the land should be returned to its original purpose as it was separated from Barnhorn Farm Estate in 1944 or would the UAE reopen their training school?
	Assuming that a 'no development' option may not be acceptable, we would favour a tourism or institutional led development as least intrusive to the peace of the area. Recreational areas can create a lot of noise.
	There is nothing about the effect on close neighbours or potential noise and air pollution which are the real problems.
	It should be demonstrated that there will never be any damage to the integrity of the Pevensey Levels and traffic will be limited.
	Another road from Northeye to Ninfield or North Bexhill should be constructed
Policy BEX11: Land at Sidley Sports and Social Club, Bexhill	Fully support this allocation which is backed up by evidence in the most recent Playing Pitch Strategy. A stage E review should be undertaken to ensure the evidence base is up to date.
	Support the allocation.
	Support policy as sports facilities are lacking in the Sidley Area.
	Policy includes requirements to provide off site highway works to make the development acceptable in highway terms. Should be noted that combined, BEX6, BEX9, BEX10 and BEX11 may have a cumulative impact of the SRN and may be required to contribute toward improvements on the wider road network (Highways England).

	Policy is unsound in terms of paragraph 35 of the NPPF as there is no evidence that the policy is deliverable. Object to para 9.130 as the Playing Pitch Strategy is internally inconsistent and does not form a sound evidence base and while a feasibility study was commissioned by the council the site owner was not invited to engage. Modifications to the policy are suggested to provide for up to 54 dwellings and an artificial 3G pitch alongside associated ancillary uses and parking facilities.
Policy BEX12: Bexhill Town Centre	Policy BEX12 should be strengthened and re-worded to include the term 'social zones'.
Policy BEX13: Bexhill Town Centre Primary Shopping Area	The policy should include reference a maximum height of buildings in the town centre.
Policy BEX14: Land south-east of Beeching Road, Bexhill	BEX14 requires junction improvement works. It should be noted that combined, BEX6, BEX9, BEX10, BEX11 and BEX14, may have a cumulative impact of the SRN and may be required to contribute toward improvements on the wider road network (Highways England).
	The proposed retail area appears constrained and there are concerns that a viable scheme cannot be delivered. Policy re-wording is suggested.
Policy BEX15: Bexhill Cultural Area	Support policy.
Policy BEX16: London Road - Sackville Road Enhancement Area	Please take into consideration the disabled during and post construction. There should be no shared spaces for vehicles, cyclists and pedestrians.
Policy BEX17: Little Common and Sidley District Centres	Paras. 9.186 and 9.187 do not define "high concentration of takeaways" and these are linked to deprivation and health and wellbeing without any evidence. Additional wording and re-wording of text suggested.
	Why are so many takeaways allowed and why are the shutters necessary - a Sidley plan should be worked on.

CHAPTER 10. HASTINGS FRINGES

Issue Area	Views expressed in representation
Context	The ESCC Walking and Cycling Strategy should be mentioned within the opening text of the Hastings Fringes chapter (East Sussex County Council).
Policy HAS1: Combe Valley Countryside Park (CVCP)	Support the Policy – particularly in relation to requirements to the Site of Scientific Interest (SSSI) and Local Wildlife Site (LWS). Although the term, ‘where practicable’ should be removed from the policy (Natural England).
	Crowhurst Parish Council Recreation Ground should not be included (Crowhurst Parish Council).
	The supporting text to Policy HAS1 incorrectly refers to waste collection rather than waste management (East Sussex County Council).
	Support the continued development and maintenance of the CVCP which is an important part of the shared approach for Hastings and Bexhill (Hastings Borough Council).
	Support the open landscape at the entrance of the Park and it would be adversely affected by any significant built structures in this location.
HAS2: Land at Michael Tyler Furniture, Woodlands Way, Hastings	Support the allocation (Hastings Borough Council).
	Criteria (iii) in the Policy should recognise the watercourses which flow north into gills within Park Wood and therefore reflected in the site’s design. Amended text is suggested.
Policy HAS3: Land North of A265, Ivyhouse Lane, Hastings	The detail map shows that the site lies within the AONB, the policy wording should recognise this designated landscape (Natural England).
	Support the allocation (Hastings Borough Council).
	This allocated is located adjacent to operational railway land and infrastructure. RDC and potential developers should be aware of the relevant Network Rail standard guidelines and requirements when developing sites located adjacent to such land (Network Rail).
Policy HAS4: Rock Lane Urban Fringe Management Area	Support the Policy – concern is raised about urban sprawl on the edges of Hastings and improvements to biodiversity is welcomed.
	Support the policy. However, as the site is located in the AONB, this should also be reflected in the policy wording. Also consider clarifying the aims of multifunctional greenspace to prevent inappropriate development in the area (Natural England).
	Support the policy and HBC will work with Rother on any guidance which will support the policy approach (Hastings Borough Council).

CHAPTER 11. VILLAGES WITH SITE ALLOCATIONS

Beckley Four Oaks

Issue Area	Views expressed in representation
Development provisions and development boundary	Object to the development boundary, it should be enlarged to include site FO10 (Land at Kings Bank Lane) (as referenced in Appendix 3 of the DaSA Local Plan Options and Preferred Options document, Dec 2016), which should be allocated for circa 10 units.
	Site FO2 (Former Vineyard site, Whitbread Lane) (as referenced in Appendix 3 of the DaSA Local Plan Options and Preferred Options document, Dec 2016) should be allocated for housing.
Policy BEC1 – Land east of Hobbs Lane	The allocation should be reduced in size to consist solely of the brownfield portion of the site for a lower quantum of development, circa 7 units. Given its location on the edge of the village, separated from services, allocation of the greenfield portion extending into the open countryside is not appropriate.
	The allocation is not appropriate. The brownfield portion of the site is an important asset that should be safeguarded for employment development.
Policy BEC2 – Land south of Buddens Green	No objection to allocation.
	Development of this greenfield site would be an unwelcome extension into the AONB countryside. Visually the site is an important gap to be protected from development, as identified in a 2005 appeal decision
	Development would harm the amenity of adjoining residents and users of the public footpath.
	Affordable housing could be provided at alternative sites instead (Sites FO2/ FO8 as referenced in Appendix 3 of the DaSA Local Plan Options and Preferred Options document, Dec 2016)).

Broad Oak

Issue Area	Views expressed in representation
Policy BRO1 – Land west of the A28, Northiam Road	Support the requirement for a 15 metres buffer to protect the ancient woodland.
Policy BRO2 – Land at the Rainbow Trout Public House	Additional land within the site, south of the public house itself, should be allocated for housing rather than public house use as it is currently surplus to the public house's requirements.
	The site includes land in two separate ownerships and should not be combined.
	By virtue of the current consented uses there is no need to include the public house in the allocation. The housing element is justified on a stand-alone basis.
	Southern Water has assessed the capacity of the local sewer network to accommodate anticipated foul flows from the development and has determined that network reinforcement will be required prior to occupation to ensure there is no increased risk of flooding. Therefore, an additional policy criterion should be included to require occupation of the development to be phased to align with the delivery of sewerage infrastructure (Southern Water).

Camber

Issue Area	Views expressed in representation
Development boundary	Support the development boundary.
Policy CAM1- Land at the Former Putting Green, Old Lydd Road	Criterion (vii) needs to be clarified in terms of what “contribute towards implementation” of the Dungeness Complex Sustainable Access and Recreation Management Strategy (SARMS) actually means.
	As the site is situated only 130 metres from the Romney Marsh and Rye Bay SPA and Ramsar site, the policy should include a requirement to ensure no adverse impact upon it (as with Policy CAM2).
	The Detail Map (Figure 46) should include the location of the SSSI.
	The allocation will result in the unacceptable loss of 70 pay and display car parking spaces and should be deleted. The Council should instead consider opportunities to extend much-needed public parking in the area to help reduce unauthorised roadside parking in Old Lydd Road during peak summer months.
Policy CAM2 – Land at the Central Car Park, Old Lydd Road	Criterion (vi) needs to be clarified in terms of what “contribute towards implementation” of the SARMS actually means.
	The Detail Map (Figure 47) should include the location of the various environmental designations in the vicinity of the site.
	The allocation will result in the unacceptable loss of 170 pay and display car parking spaces and should be deleted. The use of an existing overflow car park will be inadequate compensation. The Council should instead consider opportunities to extend much-needed public parking in the area to help reduce unauthorised roadside parking in Old Lydd Road during peak summer months.
	The policy should require the provision of public (including disabled) access to the beach for residents and visitors, as this is the only area which currently has level access onto the beach.

Catsfield

Issue Area	Views expressed in representation
Development provisions	Site CA8 (The Brooks, Church Road) (as referenced in Appendix 3 of the DaSA Local Plan Options and Preferred Options document, Dec 2016) is more appropriate than the site subject to Policy CAT1 and should be allocated for housing. It would not encroach on the AONB and could also accommodate facilities such as a doctor's surgery, car park, play areas, village green and biodiversity features.
Policy CAT1 – Land west of the B2204	An additional policy criterion should be included that states that proposals will only be permitted where an Appropriate Assessment (AA) under the Habitats Regulations demonstrates beyond reasonable scientific doubt that these can be delivered on the site without harming the integrity of the Pevensey Levels Special Area of Conservation/ Ramsar site. This criterion is already included for Policies BEX9 and BEX10.
	As the site is within the Pevensey Levels Hydrological Catchment Area (PLHCA), an additional policy criterion should be included to require at least two forms of appropriate Sustainable Drainage in accordance with Policy DEN5. This would be consistent with other allocations within the PLHCA.
	Development of this greenfield site will be an unwelcome extension into the AONB countryside.
	The site is inappropriate as it is on the opposite side of a dangerous road to the main part of the village including the school and church. It contravenes Core Strategy policies and the NPPF.
	The site is inappropriate as it is a floodplain.
	Development would harm bird populations.
	The village services are insufficient to accommodate an increase in its population.

Fairlight Cove

Issue Area	Views expressed in representation
Development provisions and development boundary	There is no justification for extending the development boundary to include the site subject to Policy FAC2 (Fairlight Parish Council).
	Additional land should be allocated for residential development, a doctors surgery, shop and open space at land south of Pett Level Road (site FC2a as referenced in the DaSA Sustainability Appraisal (Sept 2018)).
Policy FAC1 – Land at the Former Market Garden	Support the policy/ parts of the policy (Historic England).
	The contribution the site makes to the area's green infrastructure network has not been fully considered.
	Reference should be made to the need to create safe pedestrian routes to and from the site, which is particularly important given the lack of footway on the unadopted highway (East Sussex County Council).
Policy FAC2 – Land east of Waites Lane	Support the policy/ parts of the policy.
	We have always resisted development of this site and our position remains unchanged, however it is recognised there is no alternative site in Fairlight, only if a local need is demonstrated (Fairlight Parish Council).
	The number of houses should be reduced (Fairlight Parish Council).
	Development would need to show how all planning issues including drainage and safe access would be managed (Fairlight Parish Council).
	The development will cause harm to the AONB including dark night skies/ the Landscape Assessment is flawed.
	The development would be out of keeping with the character of the locality.
	The development will harm residents' amenity.
	Local residents do not support the allocation.
	The site access is inappropriate/ hazardous and the road network is poor.
	The development would be poorly integrated with the village; pedestrian access into the village is poor and not suitable for disabled people.
	The village's infrastructure cannot support 30 additional houses, local services are already limited.
	There is no need for additional housing in Fairlight Cove, existing houses do not sell quickly.

	There are serious drainage issues on the site; its development will advance coastal erosion. There is a lack of capacity in the public sewerage system.
	The proposed GP surgery is unlikely to materialise due to its cost, difficulties in recruiting staff and the need for support from the NHS.
	Requirements for a GP surgery and long access road will prompt proposals for a larger scale development to finance the development, which would be inappropriate in the AONB.
	The site is productive farmland, much needed for food production.
	The Council has failed to consult people appropriately and has not followed its Statement of Community Involvement.
	The site should be enlarged to include sites FC2 and FC2a as referenced in the DaSA Sustainability Appraisal (Sept 2018), with the developable area in the western and central/northern parts of the site. Open space, a GP surgery and shop should also be included in the allocation.
	The site density is too low: the site could accommodate 45 dwellings rather than 30.
	The policy should not require age-restricted housing but instead, a proportion of housing suitable for older people.

Iden

Issue Area	Views expressed in representation
Development provisions and development boundary	Site ID6 (Land at Orchard Farm) (as referenced in Appendix 3 of the DaSA Local Plan Options and Preferred Options document, Dec 2016) should be allocated instead of the site subject to policy IDE1, or should be used as an exception site. It is a brownfield site and the employment use, which employs only a small number of people, could easily be relocated to Rye Harbour. It is near the centre of the village and has an existing safe access onto a straight road. The development could be screened by planting. Its development is supported by local residents.
	We question whether a full evaluation has been undertaken of site ID6 (Land at Orchard Farm) to justify its rejection. It may be a more appropriate alternative (Iden Parish Council).
	Local services will need to be improved including access to work and further education.
	The DaSA states that no new sites have come forward recently, but to our knowledge no such request has been made (Iden Parish Council).
	Rural exception sites should be considered as an alternative way of achieving the affordable housing needed (Iden Parish Council).
Policy IDE1 – Land south of Elmsmead	The Parish Council was not properly consulted (Iden Parish Council).
	Local residents do not support the allocation.
	The site has been rejected in the past.
	The site access via Elmsmead is inappropriate and will cause considerable disruption for existing residents (Iden Parish Council).
	The junction of Elmsmead with Main Street is already dangerous.
	Rose Cottage, a listed building, would be adversely affected.
	The development will cause harm to wildlife.

Northiam

Issue Area	Views expressed in representation
Development provisions and development boundary	The development boundary should be revised to include land at the former Blue Cross Animal Hospital (part of site NO19 as referenced in Appendix 3 of the DaSA Local Plan Options and Preferred Options document, Dec 2016).
	The former Blue Cross Animal Hospital should be allocated for 45 units and community hub with associated infrastructure and open spaces. Alternatively a smaller (brownfield) portion of the site should be allocated for up to 17 units. It is a sustainable, well-contained, partly brownfield site, well related to village services with no ecological constraints. The site rejected in the 2013 SHLAA Review (site NO19) was much larger. Concerns related to the impact on heritage assets and access but supporting evidence demonstrates these can be overcome. The site is suitable, deliverable and achievable and should be allocated ahead of the sites subject to Policies NOR1 and NOR2, or alternatively, in addition to NOR1 and NOR2 to ensure flexibility to meet the village's housing needs.
	Land at Friars Cote Farm, Dixter Lane (part of site NO8 as referenced in Appendix 3 of the DaSA Local Plan Options and Preferred Options document, Dec 2016) should be allocated for 12 units. It is well placed near existing facilities and visually, it forms a natural extension to existing development in Dixter Lane.
	Even if NOR1 and NOR2 are developed, if option (b) is taken forward on NOR2 this would leave a shortfall of 16 dwellings compared to the residual Core Strategy requirement for the village.
	A 20% increase should be applied to the Core Strategy housing requirement to overcome the Council's record of persistent under-delivery, and consequently, the village requirement is 148 dwellings with a residual requirement of 83.
Policy NOR1 – Land south of Northiam Church of England Primary School	Support the policy/ parts of the policy (Northiam Parish Council, Historic England).
	The site is on the very edge of the village. Other sites are better related to village services.
	It is unclear whether a safe access could be achieved.
	The site is small and heavily constrained by TPO trees on its eastern boundary which limit the developable area, and it is within a Biodiversity Opportunity Area.
Policy NOR2 – Land south of The Paddock/ Goddens Gill	Support part (ii) of the policy including the required 15 metres buffer to the ancient woodland.
	Concerns with the proposed density (Northiam Parish Council).
	The site may not be deliverable. It has been allocated since 2006 but has not been developed.

	The smaller development is unlikely to be viable.
	It is a greenfield site and should not be allocated when a brownfield site (the former Blue Cross Animal Hospital) is available.

Peasmarsh

Issue Area	Views expressed in representation
Development provisions and development boundary	Sites PS5 (Land north-east of Tanhouse), PS6 (Land adjacent to superstore) and PS7s (Land south of Oaklands, Main Street) (as referenced in Appendix 3 of the DaSA Local Plan Options and Preferred Options document, Dec 2016) should be allocated instead of the site subject to Policy PEA1. Access could be achieved via the existing roundabout via site PS5 or via the A268 via site PS7n. It would avoid the serious access and drainage issues on PEA1 and there would be no loss of dwellings. The sites have been rejected by the Council because of the alleged impact on the rural character of the area but this ignores the fact the sites lie adjacent to nearby commercial facilities with 24 hour lighting including the supermarket and petrol station.
	Sites PS7s and PS7n (Land at Oaklands, Main Street) (as referenced in Appendix 3 of the DaSA Local Plan Options and Preferred Options document, Dec 2016) should be allocated instead of the site subject to Policy PEA1. It is better integrated with and closer to village amenities than PEA1. Access is no worse than for PEA1. It is visually contained from the wider AONB and there is the opportunity to also provide green space.
	The actual number of houses proposed in the allocation, and required in the village, is unclear (Peasmarsh Parish Council).
Policy PEA1 – Land south of Main Street	The words “as far as reasonably practicable” should be deleted from part (vi) of the policy (Natural England).
	The allocation should be reduced to 40 dwellings (Peasmarsh Parish Council).
	The requirement for open space should be removed (Peasmarsh Parish Council).
	The site access is unsuitable and hazardous and no evidence has been provided that an acceptable access can be achieved (Peasmarsh Parish Council).
	The site suffers from surface water flooding which affects neighbouring residents. SuDS is a short term solution only (Peasmarsh Parish Council).
	The development would harm the amenity of many residents and this has not been considered.
	Local people/ the Parish Council have not been properly consulted (Peasmarsh Parish Council).
	Data within the DaSA is inaccurate: the statement on public transport is out of date as the bus service has got worse, there is poor availability of/ access to medical and dental services, and there is no shortage of accessible open space.
	Local services are more limited than the DaSA suggests (Peasmarsh Parish Council).

	The current infrastructure and amenities in the village are insufficient and will not support 45 additional homes.
	The Council has given too much weight to the proposed re-instatement of an old orchard, which in any event has a limited lifespan. This would not be a genuine public open space in view of the nature of the land and public benefits would be limited.
	The orchard trees may already be unsafe and the burden of maintenance is likely to fall to the Parish Council (Peasmarsh Parish Council).
	There is no need for a new play area. The play area at the recreation ground was replaced in 2018 and a key aim of this was to improve community cohesion. An additional play area only a short walk away directly contradicts these efforts and could lead to the children in that area becoming isolated (Peasmarsh Parish Council).
	The proposal would result in the loss of an attractive dwelling.
	The site is likely to be expensive to develop and 40% affordable housing is unlikely to be achieved.
	There are a number of records of refusals for small-scale residential development on adjacent land.

Rye Harbour

Issue Area	Views expressed in representation
Policy RHA1 – Land at Stoneworks Cottages	Given the site's proximity to the Dungeness, Romney Marsh and Rye Bay Special Protection Area (SPA), reference to the Dungeness Complex Sustainable Access and Recreation Management Strategy (SARMS) should be included. An additional policy criterion requiring a contribution to the SARMS should be added, to be consistent with the policies for Camber (CAM1 and CAM2).
	An additional policy criterion should be added to ensure proposals are only permitted where there is no adverse impact on the adjacent SSSI, SPA or Ramsar site, to be consistent with the policies for Camber (CAM1 and CAM2).
	An additional policy criterion should be added to require the protection and potential enhancement of the settings of the Grade II listed Holy Spirits Church and the Schoolhouse, in view of the proximity of these heritage assets to the allocation site (Historic England).
	The site is adjacent to the Dungeness, Romney Marsh and Rye Bay SSSI/ SPA/ Ramsar site, which is sensitive to water quality impacts. In order to protect these designated sites, proposals must consider all potential pathways for hydrological impacts (not just groundwater). The policy does not identify the need to include adequate surface water protection measures and this must be included. A comprehensive approach must be undertaken in order to mitigate any potential adverse impacts, which is likely to require the inclusion of SuDS (Natural England).
Policy RHA2 – Harbour Road Employment Area	An additional policy criterion should be added to ensure proposals are only permitted where there is no adverse impact on the adjacent SSSI, SPA or Ramsar site, to be consistent with the policies for Camber (CAM1 and CAM2).
	An additional policy criterion should be added to require surface water drainage and foul provision agreements. This is because drainage at this location is an issue due to contamination (Environment Agency).
	Recognition of the need to safeguard minerals and waste infrastructure is supported (ESCC).
	There needs to be an element of flexibility in the definition of the Employment Area boundary to accommodate future development proposals.
	The Employment Area boundary should be enlarged to include part of site RH6 (as referenced in Appendix 3 of the DaSA Local Plan Options and Preferred Options document, Dec 2016), to allow the expansion of an existing employment site. Environmental impacts could be mitigated through an ecological management plan.

Westfield

Issue Area	Views expressed in representation
Development provisions and development boundary	Land adjoining Mill Lane/ Cottage Lane (a variation of site WF10 as referenced in Appendix 3 of the DaSA Local Plan Options and Preferred Options document, Dec 2016) should be allocated for 80 dwellings and should be included in the development boundary. It is within reasonable walking distance of amenities and a suitable access can be obtained. A high quality development could deliver a mix of houses with open space and pedestrian linkages with only a negligible impact on the landscape and townscape character and no significant impact on the High Weald AONB.
	For the housing strategy at Westfield to be found sound, additional land is needed. There can be no reasonable certainty that Land at Westfield Down (Policy WES1) will be developed as it has been an allocation since 2006, or that 40 dwellings will be delivered at the Moorhurst site (Policy WES2) within the Plan period, and in any event, residential development at the Moorhurst site will only replace the previous residential accommodation (care home) lost to demolition.
	There would appear to be a more suitable site to meet the housing needs of the village whilst also providing possible employment and community facilities. That is land at Tanyard Farm House, Fishponds Lane (site WF13 as referenced in Appendix 3 of the DaSA Local Plan Options and Preferred Options document, Dec 2016).
Policy WES1 – Land at Westfield Down	Development could have an adverse effect on the landscape character of the High Weald AONB, contrary to national policy, particularly due to floodlighting which may be associated with the sports pitches. An assessment of potential impacts has not been completed. The allocation is not justified as it does not provide sufficient evidence to support its inclusion with regard to impacts on the AONB, considered against reasonable alternatives. Pending further information the policy may be found to be inconsistent with national policy in this regard. It is for the decision maker to decide if a proposal constitutes major development. If it does, the allocation should be assessed against NPPF paragraph 172 and if the criteria cannot be met, the allocation should not be pursued. If it is not considered major development the policy should include wording requiring early consideration of impacts (such as, but not limited to, floodlighting) to avoid impacts on the AONB and conflicting with other local plan policies (Natural England).
Policy WES2 – Land at the former Moorhurst Care Home	The site is not well connected to existing services and pedestrian access to the village is poor.
	The site is too small to satisfactorily accommodate 40 dwellings.
	The proposed housing tenure would not provide a balanced housing mix for the village.

Policy WES4 – Land between Moor Lane and the A28	Support the policy as the village currently has no allotments (Westfield Parish Council).
	The land is totally unsuitable for allotments due to its sloping nature and boundary trees.
	The proposed use will adversely affect the amenity of adjoining residents due to direct overlooking.
	The proposed use will adversely affect wildlife including badgers.
	An additional policy criterion should be included to require ecological improvements to be implemented in accordance with the Hastings Fringes Biodiversity Opportunity Area and Rother Green Infrastructure Study.
	The parking area would need to be designed in a way that removes the need for vehicles to reverse out, as this would be hazardous in this location opposite a 4 way junction. Reference to this requirement should be added to the supporting text (para 11.237) (East Sussex County Council).

CHAPTER 12. OTHER VILLAGES WITH DEVELOPMENT BOUNDARIES

No comments received.

CHAPTER 13. OTHER POLICIES

Issue Area	Views expressed in representation
Gypsies and Travellers	The data that Core Strategy Policy LHN5 (sites for the needs of Gypsies and Travellers) is based on is out of date.
	The temporary gypsy site at Bramble Farm, Staplecross Road, Ewhurst should be allocated to provide for the needs of the resident gypsy family who have lived there for a number of years. The proposed allocations made by policies GYP1 and BEX3c will not meet their needs.
Policy GYP1 - Land adjacent to High Views, Loose Farm Lane, Battle	As the planning permission was not implemented the site cannot be assumed to be deliverable and therefore it is unlikely to contribute to the future supply of traveller sites.
Site allocation – Land at North Bexhill (Policy BEX3)	Comments made under this section have been moved to Policy BEX3c: Land east of Watermill Lane

SUSTAINABILITY APPRAISAL

Issue Area	Views expressed in representation
Sustainability Appraisal	Disagree with scoring on site NO19 (Blue Cross Animal Hospital, Northiam) (as referenced in Appendix 3 of the DaSA Local Plan Options and Preferred Options document, Dec 2016). Site should be taken forward as an allocation.
	Disagree with scoring on site FO10 (Land at Kings Bank Lane, Beckley) (as referenced in Appendix 3 of the DaSA Local Plan Options and Preferred Options document, Dec 2016). Site should be taken forward as an allocation.
	Disagree with scoring on North Bexhill site. Land north of the North Bexhill Access Road (NBAR) should be taken forward as an allocation.
	Disagree with scoring on Sidley Sports Ground and Social Club. SA of this site is not legally compliant.
	Disagree with scoring on sites RH3 (Land adjacent to Rye Wastewater Treatment Works, Rye Harbour) and RH6 (Land south of the former spun concrete site, Rye Harbour) (as referenced in Appendix 3 of the DaSA Local Plan Options and Preferred Options document, Dec 2016). Scoring should be reassessed.
	Disagree with scoring on site FC2 (Land east of Waites Lane, Fairlight Cove) and site FC2a (Land south of Pett Level Road, Fairlight Cove) (as referenced in Appendix 4 of the DaSA Local Plan Proposed Submission Sustainability Appraisal, Sep 2018). The assessment of FC2a should be more positive than FC2.
	Agree with references to Commercial & Industrial Waste and Construction, Demolition & Excavation Waste (East Sussex County Council).
	We are content that the Strategic Environmental Assessment (Sustainability Appraisal Environment Report) appropriately assesses the potential impacts on the historic environment of the policies and programmes set out in the draft DaSA Local Plan (Historic England).

Engagement with relevant bodies on strategic matters - Schedule of Principal Activities

The following Schedule of Principal Activities should be read in conjunction with the Duty to Cooperate Statement contained at section 5 of the earlier Proposed Submission Consultation Statement (September 2018).

Strategic issue	Organisation/s	Date/ Frequency	Activity	Purpose/Outcome of engagement
<i>Local Plan preparation</i>	All East Sussex LPAs, Brighton & Hove CC (BHCC), Env. Agency	Every 2 months	Local Plan Managers meeting	20/11/18 - To discuss and agree a framework for preparing statements of common ground for on-going local plans (Minutes available) 26/09/18 – To review progress of Local Plans, timetables and common issues; also, presentation and discussion on public health aspects of plans (Minutes available) 26/07/18 – To discuss consideration of local wildlife site in local plans, as well as planning for older people, with presentations by County Ecologist and Adult Social Care representative. (Minutes available) 25/05/18 - To review progress of Local Plans and links to transport for the South East and the South East LEP, including update on the Strategic Economic Plan.(Minutes available)
<i>Cross-boundary matters</i>	All East Sussex LPAs, BHCC, TWBC	Periodic	East Sussex Strategic Planning Members Group (Portfolio Holders)	02/11/18 - Presentation and discussion on cross boundary strategic planning matters concerning the Wealden Local Plan; also, updates on the Waste and Minerals Plan Review (by ESCC) and the on-going consultation on the Rother Development and Site Allocations Local Plan. (Minutes available) 08/03/17 - Briefing on the Wealden District Council Draft Local Plan, the proposed submission version of which was due to be considered by its Full Council in the next two weeks. Also, reference to wider implications of potential A27 improvements between Polegate and Lewes, including on Rother. (Minutes available) 23/02/16 – Presentation on outcome of consultation on emerging Wealden Local Plan and discussion on key issues, options and recommendations; also discussion on the South East England Councils consideration of London development matters. (Minutes available)

				08/12/14 – Presentation and discussion on the common policy issues work programme, covering development in the High Weald AONB, biodiversity / Green Infrastructure, Renewable Energy, community facilities, older people's housing, tourism facilities and equestrian development; also, update report on housing provision issues across the wider region, and on the delivery of housing locally, as well as the outcome of a consultation regarding strategic' or 'significant' infrastructure and how to promote it. (Minutes available)
	Hastings BC	06/09/18	Meeting of Policy Managers and Senior/Principal Officers	<p>To ensure continuing compatibility and mutual benefits through on-going cooperation on current and future Local Plans, covering:</p> <ul style="list-style-type: none"> • Timetables for and progress of current Local Plans, namely the Rother Development and Site Allocations Local Plan and the Hastings Town Centre and Bohemia Area Action Plan • Discussion of specific, of cross-boundary issues in respect of these Plans – Horntye; Combe Valley Countryside Park; retail provisions; Ivyhouse Lane business area, the Rock Lane Urban Fringe Management Area and other 'Hastings Fringes' allocations in RDC's DaSA as well as strategic gaps • SA/SEA and HRA work • The potential for parallel reviews of Core Strategies, based on the shared HMA and labour market area, to be further pursued in liaison with senior officers and Members, but in any event looking at continuing past joint evidence base work on housing and economic needs/potentials and traffic modelling (Minutes available)
	Wealden DC	07/09/18	Meeting of Policy Managers and Senior/Principal Officers	<p>To discuss Local Plan progress and approaches to common issues.</p> <ul style="list-style-type: none"> • RDC highlighted Development and Site Allocations (DaSA) Local Plan programme and intention of immediate review of the Core Strategy in parallel with Hastings BC, while WDC focused on the Wealden Local Plan, with no timetable for review at the moment. • Discussed different views on HMAs, although agreed that there was little practical effect, with WDC position of limited capacity for further growth, only being able to meet its own need. Agreed similar position re employment policies; no retail development issues were identified.

				<ul style="list-style-type: none"> Reviewed similar positions re Pevensey Levels hydrology (WDC strategic SuDS provision not applicable to RDC), but appreciate differences re air quality and ecological impacts on Natura 2000 sites; WDC concern over introduction of nitrogen in the water in the Pevensey Levels, relevant officer to discuss. WDC view of need for mitigation for Ashdown Forest, Lewes Downs and Pevensey Levels sites Mitigation would take the form of a tariff. RDC would review WDC evidence published to date in its on-going HRA work. Other cross boundary infrastructure matters discussed re A27/A259 improvements, promotion of High Speed Rail (HSR) extension Consistency of approaches to common issues, eg the AONB, biodiversity, countryside development policies, local housing needs and ageing population. (Minutes available)
	Tunbridge Wells BC	15/11/18	Meeting of Policy Officers	Discussed approach to Statements of Common Ground; Local Plan programmes; work in relation to Ashdown Forest housing and employment provisions; transport and infrastructure, notably A21 including Flimwell crossroad; Bawls Water Reservoir; landscape and Green Infrastructure; High Weald AONB; tourism and leisure; health and social care. Further meeting planned in March 2019. (Minutes available)
	Folkestone and Hythe (formerly Shepway) DC	26/07/17	Heads of Planning meeting	To review respective responses to 2020 (organisational change) in planning sphere; to review the impact of High Speed 1 since it opened in Dec 2009; to review common planning Issues.
	Folkestone and Hythe (formerly Shepway) DC	20/07/17	Planning Policy Managers meeting	Discussion of respective plans and emerging proposals for Otterpool Park, for RDC the Development and Site Allocations Local Plan and, for SDC, the Places and Policies Local Plan, as well as the Shepway Core Strategy Local Plan Review with a potential new policy for a garden settlement to cater for need over the longer term to 2037. This may meet wider residual needs. Receipt of a draft of the Dungeness Sustainable Access Strategy, commissioned jointly by SDC and RDC, noted, with meetings being set up with the consultants and Natural England. (Minutes available)

	Ashford BC	05/10/17	Heads of Planning meeting	To discuss approach to unmet housing need from Rother vis-à-vis Ashford's capacity following rescinding of South East plan and Ashford's growth point status. RDC accepted ABC's argument about limited capacity to meet further needs at present. RDC agreed to review level of need in Local Plan Review, while ABC would support High Speed Rail works at Ashford station which could boost the housing market in Rother.
<i>Infrastructure</i>	All infrastructure providers	7/12/18 – 20/12/18	IDP Update letter	All infrastructure providers identified and written to. Information required for update to the Infrastructure Delivery Plan.
	Southern Water	26/09/18; 14/06/18; 26/04/18; 09/02/18	North East Bexhill Drainage Meeting	To progress development of a strategic drainage solution by Southern Water to facilitate major development to the north-east and north of Bexhill, as well as updates on interim approaches.
		14/8/18 - 16/8/18	Email correspondence	To discuss Southern Water's requested additions to certain site allocation policies
		1/8/18- 15/8/18	Email correspondence	For advice on sewer layouts in development sites generally, to inform the DaSA
		8/3/18	Email correspondence	For advice relating to a proposed allocation site
		28/2/18	Email Correspondence	For advice relating to a proposed allocation site
		10/1/18 – 31/1/18	Email correspondence	To clarify some of Southern Water's comments made at Regulation 18 stage and request information relating to certain allocation sites
	Clinical Commissioning Group	27/9/18- 12/10/18	Email correspondence	To clarify the CCG's position relating to a proposed allocation.
		5/9/18	Letter	To clarify the CCG's position relating to a proposed allocation.

		7/12/16	Letter	To clarify the CCG's position relating to a proposed allocation.
		18/7/16 - 25/8/16	Email correspondence	For advice on a proposed allocation site
		13/6/16	Meeting	Meeting between RDC officers and representatives of the CCG to discuss the quantum of development planned for the district and its implications for the CCG, to inform the development of the DaSA. (Minutes available.)
	ESCC Childrens Services	19/12/18; 01/02/18	Email correspondence	To provide regularly updated information on planned new housing numbers in order to inform education planning and review implications of development on school places.
	ESCC Highways	10/08/18-21/09/18	Meetings; email correspondence	To jointly procure traffic modelling work for the Bexhill area
		26/6/18	Email correspondence	For advice on a proposed allocation site.
		12/6/18-10/10/18	Email correspondence	For advice on a proposed allocation site.
		12/4/18 – 10/5/18	Email correspondence	For advice on a number of proposed allocation sites.
		Periodic dates to 2016	Email, phone conversations and joint site visits	To obtain Highway Authority advice on potential allocation sites.
	Highways England (HE)	09/01/19	Telephone conference call; emails	Discussion to clarify methodology of transport modelling in response to queries raised by HE.

		1/8/18	Email correspondence	For advice on new accesses from trunk roads, to inform the DaSA.
		18/7/18-20/7/18	Email correspondence	For advice on a proposed allocation site
	ESCC, HBC, Commercial bus operator	14/11/18 24/05/18; 05/02/18; 09/11/17; 18/05/17	Quality Bus Partnership meetings	To promote improved bus services and infrastructure in the Hastings and Bexhill area. (Minutes available)
	Transport for the South East	05/03/18; 06/12/17; 29/09/17	Meetings	To contribute to the development of a wider transport strategy, to provide a framework for and to integrate with growth proposals.
<i>Environment</i>	Natural England	May 2018	Email correspondence	Engagement with NE using its Discretionary Advice Service on an interim approach to considering air quality impacts on Natura 2000 sites.
		11/1/19	Email correspondence	To discuss Natural England's comments made at Regulation 19 stage.
		18/1/18 – 9/2/18	Email correspondence	To discuss the effect of proposed allocation sites on Natura 2000 sites and SSSIs and Natural England's comments made at Reg 18 stage.
	Ashdown Forest Working Group	Regular – from 21/07/17	Meetings	To discuss approaches to Local Plan development levels for cumulative impact purposes, to review assumptions for modelling, to discuss methodologies, leading to preparation of a SoCG, signed by RDC in March 2018. (SoCG and Minutes available.)
	Wealden DC	20/12/18	Meeting	To understand WDC approach to the Pevensey Levels Natura 2000 Site, particularly WDC's assessment in Local Plan that development is having an adverse effect of integrity for air quality reasons. WDC indicated likely change of position to align with RDC (and NE). Agreement on hydrological issues. (Minutes available)

	Natural England; LLFA	Dec 17-Jan 18	Email correspondence	Request and agreement to RDC further engagement in a project to promote attention to water quality issues in the Pevensy Levels catchment, further to RDC new Local Plan policy agreed previously with NE and LLFA (see below).
	ESCC as Lead Local Flood Authority/ Romney Marshes Area Internal Drainage Board	28/8/18-18/9/18 15/2/18-28/3/18	Email and telephone correspondence Email correspondence	Correspondence with ESCC and the Internal Drainage Board on the sustainable drainage policy for the DaSA (DEN5). To clarify comments ESCC made on the drainage policy for the DaSA (DEN5) at Regulation 18 stage.
	Folkestone & Hythe DC (formerly Shepway DC); NE	Regular contact 2017/2018	Meeting (15/09/17) and email correspondence	Joint preparation of a Sustainable Access and Recreation Management Strategy (SARMS), with meeting with NE to discuss the consultants' draft SARMS and policy responses by both Councils
	Environment Agency	2/8/18 – 6/8/18	Email correspondence	For advice on flood risk on a proposed allocation site.
	High Weald AONB Partnership	On-going	Meetings of the Joint Advisory Committee and the Officer Steering Group	To provide coordination across the High Weald AONB (covering 15 local authority areas) for the conservation and enhancement of the landscape and scenic beauty of the AONB. (Minutes available)
	Combe Valley Countryside Park Board	On-going	Meetings	For the furtherance of the objectives of the Countryside Park, including support for the Local Plan policy and defined extent of the Park. (Minutes available)
	County Ecologist	28/6/18	Email correspondence	Ecological advice to inform DaSA Policy DEN4.

		23/5/18	Email correspondence	Ecological advice to inform site allocations in the DaSA.
		January 2018	Email and telephone correspondence	Ecological advice relating to a proposed allocation site and appropriate policy requirements.
	County Archaeologist	25/1/18	Meeting	To discuss the County Archaeologist's comments on proposed allocation sites in the DaSA at Regulation 18 stage and how archaeology can be addressed generally within the DaSA.
<i>Marine Planning</i>	Marine Management Organisation (MMO)	4/10/18	Event	To obtain an update on the recently adopted South Marine Plan and consider any implications for the DaSA.
		6/9/16	Event	To obtain information on marine planning and the Marine Plan.
		May – Oct 2015	Email correspondence and meeting	Correspondence with the MMO on text on marine planning for inclusion in the DaSA.
<i>Older people</i>	East Sussex Adult Services; LPAs	20/06/18	Workshop	To discuss older persons housing needs, drawing on analysis by the Housing LIN, and the information needs for planning purposes.
<i>Waste and Minerals</i>	East Sussex County Council	18/1/18 – 2/2/18	Email and telephone correspondence	To discuss ESCC's comments made on the DaSA at Regulation 18 stage in relation to a proposed allocation site.
Gypsies and Travellers	ES LPAS	27/09/2018	Meeting	To discuss unauthorised encampment data and existing provision across the County
		26/09/2017	Meeting	To discuss unauthorised encampment data and existing provision across the County (Minutes available)

Appendix 1: Extract from Statement of Community Involvement

A – Local groups and individuals. This group includes residents, community groups, voluntary groups and specific interest groups (for example chambers of commerce, conservation societies) as well as interested individuals.

B – Parish and town councils, adjoining parish councils. Town and Parish Councils have a particular role to play in representing the views of their communities in the planning process.

C – Utility and service providers. This group includes water, sewerage, gas and electricity companies, health providers and emergency services.

D – Government bodies/neighbouring local authorities and collaborative bodies. This group includes the South East Local Enterprise Partnership, the High Weald Joint Advisory Committee and the East Sussex Local Nature Partnership, as well as East Sussex County Council, neighbouring district and borough councils and relevant Government departments. The 'duty to cooperate' introduced in the Localism Act 2011⁷ and reflected in the NPPF, gives added emphasis to constructive and ongoing cooperation with neighbouring councils and other public bodies to ensure that strategic issues are appropriately addressed across local authority boundaries. There needs to be particular collaboration with Hastings Borough Council given common economic and housing markets.

E – East Sussex and Rother Local Strategic Partnerships


F – National organisations and agencies. There are a range of national organisations and agencies which have specialist expertise to input. Examples of such groups are Heritage England, Natural England, the Environment Agency, Highways England and Sports England.

G – Developers, landowners, planning consultants

Appendix 2: Public Notice – 26th October 2018

Featured in Hastings & St Leonards Observer, Bexhill Observer, Battle Observer and Rye Observer.

**Notice under Regulations
19 and 35 of the Town and
Country Planning
(Local Planning)
(England) Regulations
2012 (as amended)**



**PROPOSED SUBMISSION
ROTHER DISTRICT
DEVELOPMENT AND
SITE ALLOCATIONS LOCAL PLAN**

Rother
District Council

Rother District Council has approved the Proposed Submission 'Development and Site Allocations Local Plan' ("DaSA") and the accompanying Sustainability Appraisal for a six-week period for representations.

The DaSA Local Plan follows on from the Council's adopted Core Strategy, and sets out how its development targets will be achieved, with site allocations in settlements not being covered by Neighbourhood Plans. It also contains detailed policies for the effective management of development in relation to a range of topics.

When adopted, the policies in the DaSA Local Plan will be used alongside those in the Core Strategy and made Neighbourhood Plans to make decisions on planning applications within Rother district.

The DaSA Local Plan, Sustainability Appraisal and supporting documentation can be viewed on the Council's website (www.rother.gov.uk/dasa). They will be placed on deposit for 6 weeks from 26th October to 7th December at the following deposit points during normal working hours:

- Rother District Council Town Hall, Town Hall Square, Bexhill-on-Sea, TN39 3JX
- Battle Library, 7 Market Square, Battle, TN33 0XB
- Rye Help Point, 30a High Street, Rye, TN31 7JG

Paper copies of the Proposed Submission DaSA Local Plan (including policies map) may be purchased via the website, from the Town Hall, Bexhill or by post from the address below (price £35.00, plus £5.30 p&p). Cheques should be made payable to Rother District Council.

During the deposit period, any person or organisation may make a representation. Representations can be submitted online at www.rother.gov.uk/dasa. A representation form is also available using the above weblink, which can be sent via email (dasa.reps@rother.gov.uk). Representations may also be sent to the Service Manager – Strategy and Planning, Proposed Submission DaSA Local Plan, Rother District Council, Town Hall, Bexhill-on-Sea, East Sussex, TN39 3JX.

Copies of representations received will be made available to view and cannot be treated as confidential. The names of those making representations will be published, but not personal information such as telephone numbers, emails or private addresses.

All representations received will be submitted to the Secretary of State to be considered as part of an independent examination of the DaSA Local Plan.

Representations may be accompanied by a request to be notified at a specific address (postal or electronic) of the following: the submission of the DaSA Local Plan for independent examination; the publication of the recommendations of any person appointed to carry out the independent examination; and its final adoption.

The Examination hearings will be in public. However, if any respondent wishes to appear at the Examination as a participant, they must make a request as part of their representation. However, it will be for the Inspector to decide who attends the Examination hearings.

All representations must be received by the Council no later than 16:30 on Friday 7th December 2018. Any submissions received after this deadline cannot be considered.

Dr. Anthony Leonard
Executive Director
Date: 26th October 2018

Appendix 3: Press Release – 26th October 2018

Featured in Hastings & St Leonards Observer, Bexhill Observer, Battle Observer and Rye Observer.

Last chance for the public to have a say on shape of district

People in Rother have one last chance to have their say on a plan which will shape how the district will develop over the next decade.

Rother District Council has finalised its Local Plan, which identifies sites needed to meet the demand for housing and business land up to 2028.

The plan, which also sets out planning policies on matters such as affordable housing, water efficiency and landscape conservation, was drawn up following a public consultation which ended last year.

People now have six weeks to make formal representations on the final version of the plan, which will be submitted to the Government for consideration by an independent planning inspector.

Once formally adopted, the council will be legally obliged to take into account the plan when deciding whether to approve future planning

applications.

The part of the Local Plan being finalised, known as the Development and Sites Allocations Local Plan (DaSA), builds upon broader planning aims identified in the Core Strategy, adopted in 2014.

The plan identifies development sites in and around Bexhill and some villages in the district. Battle, Rye and some other villages are not included as they have their own individual Neighbourhood Plans drawn up or being prepared locally.

People can view the plan and supporting documents online at www.rother.gov.uk/dasa or in person at Bexhill Town Hall, the community help point in Rye or at Battle Library.

Representations can be made from today (Friday) until 4.30pm on Friday, December 7 and details of how to make representations are on the council's website and at the venues above.

Appendix 4: My Alerts Notifications

My Alerts DaSA notification – sent out on 26th October for w/c 29th October 2018



Development and Site Allocations Local Plan published

Following consultation on options for sites to meet housing and other development needs up to 2028, the Council has now published its final version of this Local Plan. It covers Bexhill and villages that are not covered by Neighbourhood Plans. It also contains proposed planning policies on a range of topics.

Anyone wanting to make representations on the Plan or its Sustainability Appraisal has six weeks (up to 4.30pm on 7th December) to do so. They will be then forwarded to an independent Planning Inspector who will assess whether the Plan meets prescribed tests.

[Find out more](#)

My Alerts DaSA reminder notification – sent out on 23rd November for w/c 26th November 2018



Development and Site Allocations Local Plan

Anyone wanting to make representations on this Plan or its Sustainability Appraisal has only two weeks left (up to 4.30pm on 7th December) to do so. The Plan covers Bexhill and villages that are not covered by Neighbourhood Plans. It also contains proposed planning policies on a range of topics.

[Find out more](#)



Santa Dash

Santa Dash is an event held by Bexhill Lions Club on Sunday 2nd December from the De La Warr Pavilion. The event will comprise of either a 2k or 5k distance, which participants can run, jog, walk, push prams or use a wheelchair. Entry is £11.50 for an Adult, and £6.50 for 5-14 year olds and includes a free santa suit.

[Find out more](#)