



# DEVELOPMENT AND SITE ALLOCATIONS LOCAL PLAN

## Main Modifications and changes to Policies Maps and Additional Modifications

Supplement to the Consultation Statement

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## Introduction

- 1.1. This Consultation Statement supplements the Proposed Submission and Submission Development and Site Allocations (DaSA) Local Plan Consultation Statements that were published in September 2018 and January 2019 respectively. It sets out the representations received in relation to the 'Modifications' to the Proposed Submission DaSA Local Plan under Regulation 20, together with a summary of the main issues raised.
- 1.2. The Schedule of Main Modifications and changes to Policies Maps (hereafter Main Modifications), the Schedule of Additional Modifications (hereafter Additional Modifications), as well as the accompanying Sustainability Appraisal (SA) Addendum and Habitats Regulation Assessment (HRA) Addendum reports, were made available for consultation for a six week period, in line with Regulation 19. The formal consultation period commenced on Tuesday 30 July and ended on Tuesday 10 September 2019.
- 1.3. Rother District Council (the Council) consulted all the groups identified in the Statement of Community Involvement (SCI) (see Appendix 1) which included both the general and specific consultation bodies as required under Regulation 19. Each group and individual received a letter or email notification at the beginning of the consultation period, as did those individuals who had expressed an interest in Rother planning policy documents<sup>1</sup> or had made representations during previous DaSA Local Plan consultations.
- 1.4. In order to notify as many people in the district as possible, a notice was published in two local papers, setting out:
  - 1) A statement of the representations procedure; and
  - 2) A statement of the fact that the Main Modifications, Additional Modifications and accompanying SA Addendum and HRA Addendum reports are available for inspection, and of the places and times at which they can be inspected.

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<sup>1</sup> Prior to the earlier consultation from 26<sup>th</sup> October - 7<sup>th</sup> December 2018, 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.

- 1.5. These notices were published in the following local papers (copies of the notices are set out at Appendix 2):
- Bexhill and Battle Observer - 2<sup>nd</sup> August 2019
  - Hastings, St Leonards & Rye Observer - 2<sup>nd</sup> August 2019
- 1.6. The Main Modifications, Additional Modifications and accompanying SA Addendum and HRA Addendum reports, were available on the Council's website at [www.rother.gov.uk/dasa](http://www.rother.gov.uk/dasa). Physical copies of these documents were made available at the Community Help-Points in Bexhill and Rye, and at the Battle Town Council Offices at the Battle Almonry. The documents, as well as other DaSA background documents, were also available to purchase on request.
- 1.7. In addition to these documents, all DaSA background papers and evidence studies were made available on the Council's website at [www.rother.gov.uk/Background-Evidence](http://www.rother.gov.uk/Background-Evidence).

### **My Alerts**

- 1.8. 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 resident's properties and surrounding area, such as a reminder of bin collections or nearby planning applications, as well as useful news and events in the wider Rother area. The My Alerts service has circa 16,500 individuals registered.
- 1.9. Two My Alerts notifications were sent out. The first, sent out on Friday 2 August, was used to notify registered individuals that the Main Modifications and Additional Modifications had been published for their respective consultations. The second, sent out on Friday 30 August, was to notify them that there were less than two weeks remaining to make representations. Both My Alerts notifications can be found in Appendix 3.

### **Ways to make comments during the consultation**

- 1.10. Representations on the Main Modifications and the Additional Modifications were invited to be submitted online, by email or letter. A representation form was also produced to assist interested parties in making representations on these Modifications.

- 1.11. The Main Modifications consultation was carried out under Regulation 19<sup>2</sup> to determine if the Main Modifications (including changes to policies maps) is legally compliant and sound. In order to assist consultees to make the type of representations required at this stage, both the online system and the representation form provided allow for representations to be made on matters regarding legal compliance and soundness.
- 1.12. The online system enabled respondents (once registered) to make representations directly on any part of the Schedule of Main Modifications and changes to the Policies Maps, and the Schedule of Additional Modifications.
- 1.13. The system also allows for all 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 in order to view the comments or representations made by others.
- 1.14. The Additional Modifications were subject to a separate consultation. Responses to the Additional Modifications are to be considered by the Council only and not by the Inspector, as they do not relate to the soundness of the Local Plan.
- 1.15. The Council also produced accompanying online 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 the legality and soundness of the Main Modifications, as a part of the DaSA's examination.
- 1.16. All the representations made at the Regulation 19 stage relating to the Main Modifications have now been published on the Council's website at [www.rother.gov.uk/dasa](http://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 the Main Modifications have been submitted to the Planning Inspectorate.

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<sup>2</sup>Regulation 19 - <http://www.legislation.gov.uk/uksi/2012/767/regulation/19/made>

## **Special arrangements for accessibility**

- 1.17. The Main Modifications and Additional Modifications, were 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?**

- 1.18. The main issues raised through the consultations are set out below and are also available to view on the Council's website at [www.rother.gov.uk/dasa](http://www.rother.gov.uk/dasa).
- 1.19. Combining the two consultations, 14.6% of the representations were made using the online consultation system, whereas 85.4% were sent received via email. There were no representations made by paper.

## **Main issues on the Main Modifications and changes to Policies Maps**

- 1.20. During the 6 week-consultation, 29 duly-made representations by 12 respondents were made on the Main Modifications, with 52% being representations of support, 10% being objections and a further 38% being comments.
- 1.21. Summaries are provided in the Schedules below but the main issues raised were:
- That Policies CAM1 and CAM2 should include specific criteria relating to the need for a Habitats Regulations Assessment (HRA);
  - That Policy HAS2 should refer to water quantity in terms of surface water-runoff as well as water quality;
  - In respect of Policy FAC2 concern was raised in respect of the revised red line boundary in terms of access, as shown in the detail map for PPM5, as well as other policy requirements.

### **Additional comments received on the DaSA not relevant to the Modifications**

- 1.22. The Council has also received 9 comments from 3 individuals regarding to the DaSA, though not related to the Modifications. These comments were made specifically regarding DaSA Policy BEX9: Land off Spindlewood Drive, Bexhill relating to correspondence from Natural England and work relating to A259 highway junctions.
- 1.23. A table containing details of these comments has also been set out in the Schedule below.

### **Main issues on the Additional Modifications**

- 1.24. During the 6 week-consultation, 12 duly-made representations by 5 respondents were made on the Additional Modifications, with 42% being representations of support and 58% being objections.
- 1.25. The main issues raised were:
- Concern that the typographical errors set out in Additional Modifications AM72 and AM73, in particular, the removal of Battle allocations from the Superseded Local Plan 2006 Policies list, would in effect reinstate allocation BT2 Land at Blackfriars;
  - Amendments made to Policy BEX1 did not rectify previous concerns.



Table1 – General Comments in relation to the Modifications to the Proposed Submission DaSA Local Plan (all documents)

Representations received	Issues expressed in the consultation
6 Reps received 0 support 0 objections 6 comments	No further comments to be made on the Modifications. (Rye Town Council, Highways England, Historic England, Natural England, Salehurst & Robertsbridge Parish Council) No reference was made to the EA's previous comments regarding water efficiency measures for commercial developments and the adoption of BREEAM standards. (Environment Agency)

Table 2 – Schedule of Main Modifications

Mod No	Modification Description	Representations received	Issues expressed in the consultation
MM1	To ensure that Policy DCO1 is clear that it does not apply to shops in Town or District Centres, in accordance with other policies.	No representations received	
MM2	Additional supporting text to DCO1, relating to the interaction with Core Strategy Policy CO1 (iii) (a)	No representations received	
MM3	Amendment to the supporting text of Policy DHG2 to provide clarity as to the locations where the policy applies.	No representations received	
MM4	Additional criterion added to Policy DHG12 regarding the management of rainwater run-off.	No representations received	
MM5	Amendment to criterion (ii) of Policy DEC2.	No representations received	
MM6	Rephrasing of Policy DEN3 in line with the NPPF.	No representations received	
MM7	Amend the Figure 7 to accord with paragraph 6.21.	No representations received	
MM8	Amendment to paragraph 6.43 to accord more closely with the PPG as to where ecological surveys and reports are required.	1 Rep received – 1 support	Support this modification. (Environment Agency)
MM9	Amendment to replace the term 'playing pitches/fields', with the term 'outdoor sports facilities' in wording of	1 Rep received – 1 support	Support this modification. (Sport England)

	Policy BEX3 and its supporting text.		
MM10	Amendment to replace the term 'playing pitches/fields', with the term 'outdoor sports facilities' in wording of Policy BEX3a and its supporting text.	1 Rep received – 1 support	Support this modification. (Sport England)
MM11	Amendment to replace the term 'playing pitches/ fields', with the term 'outdoor sports facilities' in wording of Policy BEX3b.	1 Rep received – 1 support	Support this modification. (Sport England)
MM12	Amendment to the text of criterion (iii) (b) of Policy BEX3b so that requirements for traffic management are consistent between sites for BEX3b and BEX3c.	No representations received	
MM13	Additional requirement in Policy BEX4 to upgrade the local sewerage system prior to occupation of the new development.	1 Rep received – 1 support	The Environment Agency support the new paragraph after 9.60 (and subsequent consequential paragraph number amendments) will be inserted as stated in the MM13 and the additional policy criteria in policy BEX4 (and subsequent consequential criteria number amendments). (Environment Agency)
MM14	To include the requirement for an Appropriate Assessment at planning application stage.	2 Reps received – 1 support	<p>The Environment Agency support the amendments made in MM14 regarding the two stages of SuDS and an Appropriate Assessment at planning application stage. (Environment Agency)</p> <p>Although they suggest a policy requirement for a <u>project-level HRA, with Appropriate Assessment (AA) where necessary</u>, as opposed to an outright requirement for an AA. (Natural England)</p> <p>Suggest removal of 'on site' from policy, which would allow for more flexibility in the drainage approach. (Natural England)</p>
MM15	To include the policy requirement for two stages of SuDS and an Appropriate Assessment at planning application stage.	2 Reps received – 1 support 1 comment	<p>The Environment Agency support the amendments made in MM15 regarding the two stages of SuDS and an Appropriate Assessment at planning application stage. (Environment Agency)</p> <p>Suggestion of the following amendment to the text (in square brackets): 'a minimum of two types/ stages of Sustainable Drainage (SuDS) treatment will be required to address the possible negative effects from surface run-off and hydrological pathways on the water quality</p>

			[and water quantity] in the Levels'. (Natural England)  Comments made to MM14 also apply to MM15. (Natural England)
MM16	Additional requirement to policy and supporting text to require a Travel Plan intended to promote the use of cycling, walking and other sustainable transport modes in compliance with Core Strategy Policy TR3 and the NPPF.	No representations received	
MM17	Amendment to the wording of the policy and supporting text to reflect that there are two culverts running through the site.	1 Rep received – 1 support	Whilst the Environment Agency supports the amendment to require an 8 metre easement from either side of the culverts, they would also suggest de-culverting, to bring rivers to its natural shape and benefit biodiversity in the area. (Environment Agency)
MM18	Amendment to the wording of policy BEX17 and supporting text replacing 'should be resisted' with 'not be supported', in relation to the further concentration of takeaway uses.	No representations received	
MM19	Additional text in policy HAS2 and its supporting text that requires proposals do not impact water quality in the adjacent Park Wood gills.	2 Reps received – 1 support 1 comment	The Environment Agency are pleased with the amendments in MM19, requiring additional text in policy HAS2 and its supporting text that requires proposals do not impact water quality in the adjacent Park Wood gills. (Environment Agency)  High Weald AONB Unit advise that amendment be made to the fourth sentence of paragraph 22: "There are watercourses which flow north into gills within Park Wood which are vulnerable to changes in water quality [and quantity]. Any impact on the gills will need to be considered within site design". (High Weald AONB Unit)
MM20	Additional text in policy HAS3 and its supporting text to clarify that the proposed allocation is within the High Weald AONB. A presentational error is also corrected.	No representations received	
MM21	Amend Policy BRO2, its supporting text and the Detail Map regarding sewerage capacity arrangements and amendment to the site boundary to	1 Rep received – 1 support	The Environment Agency are pleased with the amendments in MM21, amending Policy BRO2, its supporting text and the Detail Map regarding sewerage capacity arrangements and amendment to the site boundary to reflect a recent planning application delegated

	reflect a recent planning application delegated to approve.		to approve, regarding sewage capacity. (Environment Agency)
MM22	Amendment to the wording of Policy CAM1 to ensure that development has no adverse effect on the integrity of the adjacent Natura 2000 Sites.	1 Rep received 1 comment	<p>Recommendation that it be made clear in the policy that development likely to have a significant effect on the SPA/Ramsar should be subject to a Habitats Regulations Assessment (HRA). (Natural England)</p> <p>Where the supporting text refers to financial contributions to SARMS, Natural England advises the Council to be clear that the SARMS is to address impacts from future growth in tourism, and any development contributions sought from local development, e.g. through CIL, should be clearly linked to managing the future effects of tourism, and not as specific mitigation under the Habitats Regulations. (Natural England)</p>
MM23	Amendment to the wording of Policy CAM2 and its supporting text to ensure that development has no adverse effect on the integrity of the adjacent Natura 2000 Sites.	1 Rep received 1 comment	<p>Recommendation that it be made clear in the policy that development likely to have a significant effect on the SPA/Ramsar should be subject to a Habitats Regulations Assessment (HRA). (Natural England)</p> <p>Where the supporting text refers to financial contributions to SARMS, Natural England advises the Council to be clear that the SARMS is to address impacts from future growth in tourism, and any development contributions sought from local development, e.g. through CIL, should be clearly linked to managing the future effects of tourism, and not as specific mitigation under the Habitats Regulations. (Natural England)</p>
MM24	Amendment to supporting text to Policy CAT1, detailing the requirement for a project level HRA to be provided, in order to demonstrate that proposals will not adversely affect the Pevensey Levels SAC.	No representations received	
MM25	Amendment to the wording of Policy FAC2 and its supporting text to ensure clarity regarding what is required in terms of the provision of a serviced plot for a doctors surgery as part of any proposed scheme.	1 Rep received – 1 objection	The combination of the requirement for a serviced plot for a GP surgery, as well as for 40% affordable housing and 50% age-restricted units, render the policy undeliverable in viability terms. Additional flexibility is therefore necessary in relation to these requirements. (Welbeck Land LLP)

MM26	Amendment to Detail Map supporting Policy FAC2 and the Policies Map to move the boundary of the proposed access.	1 Reps received – 1 support	Support the access amendment. (ESCC Highways)
MM27	Additional criterion added to Policy RHA1 and its supporting text regarding on the adjacent Natura 2000 Sites.	1 Rep received – 1 support	The Environment Agency are satisfied with the Additional criterion added to Policy RHA1 and its supporting text regarding on the adjacent Natura 2000 Sites. In particular the amendments to paragraphs 11.197 and 11.200. (Environment Agency)
MM28	Additional criterion added to Policy RHA2 regarding on the adjacent Natura 2000 Sites, with additional supporting text.	1 Rep received – 1 support	The Environment Agency are pleased that their comments have been taken into consideration regarding the additional criterion added to Policy RHA2 regarding on the adjacent Natura 2000 Sites, with additional supporting text. (Environment Agency)
MM29	An additional criterion is added to require an appropriate drainage scheme with any submitted planning application.	1 Rep received – 1 support	The Environment Agency are pleased that their comments have been taken into consideration regarding An additional criterion is added to require an appropriate drainage scheme with any submitted planning application. (Environment Agency)
MM30	Deletion of Policy WES4 and consequential changes.	No representations received	
MM31	Appendix 1 amended to include a list of Core Strategy policies which have been superseded by their respective DaSA policies.	No representations received	
MM32	Appendix 2 amended to include list of superseded Neighbourhood Plan policies.	2 Reps received – 1 support 1 objection	<p>Additional Amendments AM72 &amp; 73 should be considered as Main Amendments as they equate to a re-introduction of the Blackfriars allocation in the 2006 Local Plan. The DaSA process until now has given the impression that the Blackfriars allocation would no longer stand. (Kember Loudon Williams)</p> <p>DaSA Policy DHG1 supersedes Ticehurst Neighbourhood Plan Policy H4 (part1 only), however, whilst improving the TNP thresholds, the DaSA allows developers to argue that affordable housing makes the development unviable. Instead the policy should require developers to submit a viability assessment BEFORE they are given planning permission. (Mrs Sheena Carmichael, Ticehurst Parish Council)</p>

Table 3 – Schedule of changes to Policies Maps

Mod No	Policies Map #	Representations received	Issues expressed in the consultation
PMM1	Policies Map Inset Map 1b: Bexhill North	No representations received	
PMM2	Policies Map Inset Map 1b: Bexhill North	No representations received	
PMM3	Policies Map Inset Map 6: Broad Oak	No representations received	
PMM4	Policies Map Inset Map 9: Fairlight Cove	No representations received	
PMM5	Policies Map Inset Map 9: Fairlight Cove	1 Representation received 1 objection	The amended access boundary as shown in PPM5 does not allow sufficient access for large vehicles, nor the required visibility splays. (Welbeck Land LLP)
PMM6	Policies Map Inset Map 14: Westfield	No representations received	

Table 4 - Additional comments received on the DaSA not relevant to the Modifications

Summary of comments made	No of reps
Policy BEX9 - Comments regarding letter from Natural England relating to SuDS and Appropriate Assessment in respect of the current planning application, and the availability of the information that this letter contains.	4 Reps received (Hugh Stebbing, Richard Caie)
Comments relating to availability of information regarding capacity of junctions on A259.	5 Reps received (Geoffrey Lawson)

Table 5 – Schedule of Additional Modifications

Additional Mod No	Modification Description	Representations received	Issues expressed in the consultation
AM1	Amendment to ensure it is clear that the villages also have development boundaries as well as site allocations.	No representations received	
AM2	Amendment to correct a typographical error by adding Catsfield to the list of 'Villages with site allocations'.	No representations received	
AM3	Amendment to add page numbers to the lists of Development Policies, Site Allocation Policies and Policies Map Inset Maps to improve usability of document.	No representations received	
AM4	Amendment to correct a typographical error for the policy number of 'Land south of The Paddock/ Goddens Gill, Northiam'.	No representations received	
AM5	Amendment to correct a styling and layout error for the Rye Harbour sub-heading.	No representations received	
AM6	Amendment to include reference to the safeguarding of minerals sites, wharves and railheads to ensure the introduction provides all key information	No representations received	
AM7	Amendment to reflect the latest statement of Government policy.	No representations received	
AM8	Amendment to correct a styling error.	No representations received	
AM9	Amendment to include updated supporting text from Policy LHN2 of the Core Strategy for clarity.	1 Rep received – 1 objection	The wording relating to paragraph 4.10 could be clearer in relation to financial contributions i.e. that this is in relation to Section 106 only and not other sums due. (Cllr John Barnes)
AM10	Amendment to include updated notes from Policy LHN2 of the Core Strategy for clarity.	No representations received	
AM11	Amendment to correct a typographical error.	No representations received	
AM12	Amendment to correct a typographical	No representations received	

	error.		
AM13	Amendment to correct a typographical error.	No representations received	
AM14	Amendment to correct a typographical error.	No representations received	
AM15	Amendment to correct a typographical error.	No representations received	
AM16	Amendment to properly reflect the restrictions of Highways England.	No representations received	
AM17	Amendment to reflect the normal expectation of accordance with other policies.	No representations received	
AM18	Amendment to improve readability.	No representations received	
AM19	Amendment to correct a typographical error.	No representations received	
AM20	Amendment to correct an erroneous reference to East Sussex County Council.	No representations received	
AM21	Amendment to include new sub-heading and paragraph in relation to information on Priority Habitats/Species and Habitats/Species of Principal Importance.	No representations received	
AM22	Amendment to improve readability and clarity of the wording.	No representations received	
AM23	Amendment to make clear that SuDS can be successfully incorporated into several developments and 'linked' to provide greater benefits.	No representations received	
AM24	Amendment to clarify that Highways England also have requirements that will need to be met.	No representations received	
AM25	Amendment to update to the correct reference in the 2019 NPPF.	No representations received	
AM26	Amendment to ensure the correct terminology is used in line with the NPPF.	1 Rep received – 1 support	The Environment Agency are pleased that reference to “contaminated land” is replaced by reference to “land contamination”. (Environment Agency)
AM27	Amendment to ensure the correct	1 Rep received –	The Environment Agency are pleased that reference to



	terminology is used in line with the NPPF.	1 support	"contaminated land" is replaced by reference to "land contamination". (Environment Agency)
AM28	Amendment to ensure the correct terminology is used in line with the NPPF.	1 Rep received – 1 support	The Environment Agency are pleased that reference to "contaminated land" is replaced by reference to "land contamination". (Environment Agency)
AM29	Amendment to clarify any ambiguity between the operation of Policy DEN2, DEN3 and DIM2.	No representations received	
AM30	Amendment to clarify that the term 'Plans' is in reference to Neighbourhood Plans specifically.	No representations received	
AM31	Amendment to correct a typographical error.	No representations received	
AM32	Amendment to correct a typographical error.	No representations received	
AM33	Amendment to update to the correct reference in the 2019 NPPF.	No representations received	
AM34	Amendment to ensure the supporting text accords with criterion (v) of BEX1 and the Detail Map (Figure 15).	1 Rep received – 1 objection	Figure 15 should not be prescriptive. In particular policy BEX1 should not use figure 15 to incorporate requirements such as the extensive landscape buffers shown on the figure when the LPA acknowledged that it has undertaken no assessment of the impact of such extensive requirement on the deliverability of the employment land requirements of the district. (SeaChange Sussex)
AM35	Amendment to accord with the acceptance of temporary solutions that was determined at the outline planning permission stage (RR/2017/2181/P).	1 Rep received – 1 objection	Whilst it is correct to remove the "prior to occupation" element, the policy still places excessive burdens on an employment site. (SeaChange Sussex)
AM36	Cartographical amendment to include NBAR for completeness.	1 Rep received – 1 objection	The Highway boundary shown in Figure 19 is incorrect. Changes to the policy map should be a matter for the Main Modifications. (SeaChange Sussex)
AM37	Amendment to provide additional clarity to criterion (iv) of Policy BEX2 and the Detail Map (Figure 20) in terms of the ancient woodland buffer that is required.	No representations received	
AM38	Amendment to improve clarity by stating that the development should	No representations received	

	consider the cumulative highway impacts of other proposals in line with Policy TR3.		
AM39	Amendment to correct a typographical error.	No representations received	
AM40	Cartographical amendment to include NBAR for completeness.	No representations received	
AM41	Policy amendment to clarify that this buffer is required to protect the ancient woodland.	No representations received	
AM42	Cartographical amendment to include NBAR for completeness.	1 Rep received – 1 objection	Although the amended Figure 23 now includes NBAR, it is not consistent with the alignment shown within PPM1. (SeaChange Sussex)  The road shown on this plan is also inaccurate as it omits the connections to Watermill Lane northbound for cars and southbound from the Pegasus crossing for equestrian and pedestrian traffic. (SeaChange Sussex)
AM43	Amendment to clarify how and where the uses can be accommodated on the site in terms of overall layout.	No representations received	
AM44	Amendment to clarify how and where the uses can be accommodated on the site in terms of overall layout.	No representations received	
AM45	Amendment to improve accuracy and clarity.	No representations received	
AM46	Amendment to remove unnecessary reference to the potential future redevelopment of the Cemetery Lodge Site.	No representations received	
AM47	Amendment to improve clarity by stating that the development should consider the cumulative highway impacts of other proposals in line with Policy TR3.	No representations received	
AM48	Policy amendment to correct a typographical error.	No representations received	
AM49	Amendment to improve clarity by	No representations received	

	stating that the development should consider the cumulative highway impacts of other proposals in line with Policy TR3.	
AM50	Amendment to correct a typographical error.	No representations received
AM51	Amendment to improve clarity by stating that the development should consider the cumulative highway impacts of other proposals in line with Policy TR3.	No representations received
AM52	Policy amendment to correct a typographical error.	No representations received
AM53	Amendment to correct a layout error between paragraphs.	No representations received
AM54	Amendment to correct a typographical error.	No representations received
AM55	Amendment to improve clarity by stating that the development should consider the cumulative highway impacts of other proposals in line with Policy TR3.	No representations received
AM56	Amendment to improve clarity by stating that the development should consider the cumulative highway impacts of other proposals in line with Policy TR3.	No representations received
AM57	Policy amendment to clarify that the floorspace figure is a net figure.	No representations received
AM58	Amendment to correct a typographical error.	No representations received
AM59	Cartographical amendment to include NBAR for completeness.	No representations received
AM60	Amendment to ensure the correct terminology is used, ie. referencing Waste Management rather than Waste Disposal.	No representations received
AM61	Amendment to the opening text of the	No representations received

	Hastings Fringes chapter, to ensure that the ESCC Walking and Cycling Strategy is referred to.		
AM62	Amendment to correct a typographical error.	No representations received	
AM63	Amendment to correct a typographical error.	No representations received	
AM64	Amendment to supporting text to reinforce the need to retain the provision for an accessible path to the beach.	No representations received	
AM65	Amendment to the supporting text so that it accords with planning application RR/2017/457/P.	No representations received	
AM66	Policy amendment to correct a typographical error.	No representations received	
AM67	Policy amendment to correct a typographical error.	No representations received	
AM68	Amendment to correct a typographical error.	No representations received	
AM69	Amendment to correct the alignment of a public right of way.	No representations received	
AM70	Amendment to correct a typographical error.	No representations received	
AM71	Amendment to correct a typographical error.	No representations received	
AM72	Amendment to make clear that LP2006 Policy EM13 and Policy Inset Map 2A still apply in Battle until superseded by a made Neighbourhood Plan.	1 Rep received – 1 objection	Additional Amendments AM72 & 73 should be considered as Main Amendments as they equate to a re-introduction of the Blackfriars allocation in the 2006 Local Plan. The DaSA process until now has given the impression that the Blackfriars allocation would no longer stand. (Kember Loudon Williams)
AM73	Amendment to correct a typographical error.	1 Rep received – 1 objection	Additional Amendments AM72 & 73 should be considered as Main Amendments as they equate to a re-introduction of the Blackfriars allocation in the 2006 Local Plan. The DaSA process until now has given the impression that the Blackfriars allocation would no longer stand. (Kember Loudon Williams)
AM74	Amendment to correct a typographical error.	No representations received	

## **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 2011<sup>7</sup> 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 – 2<sup>nd</sup> August 2019

### Bexhill & Battle Observer

### Hastings, St Leonards & Rye

Planning and Compulsory Purchase Act 2004  
Notice under Regulation 19 of the Town and Country Planning  
(Local Planning) (England) Regulations 2012 (as amended)  
**CONSULTATION ON 'MAIN MODIFICATIONS' TO THE PROPOSED  
SUBMISSION DEVELOPMENT AND SITE ALLOCATIONS LOCAL PLAN**

On Monday 29 July 2019, Rother District Council formally approved the 'Main Modifications and changes to Policies Maps' to the Proposed Submission Development and Site Allocations (DaSA) Local Plan for public consultation (hereafter 'Main Modifications').

The DaSA, once adopted, will effectively form 'part two' of the Council's Local Plan. It has been prepared to be in general conformity with the Council's Core Strategy. Together with the Core Strategy, the DaSA provides the basis for determining planning applications in much of the district and supersedes all generic policies and relevant spatial policies from the earlier 2006 Rother District Local Plan, outside of those areas where Neighbourhood Plans are currently under preparation. The DaSA Local Plan needs to be read in conjunction with Neighbourhood Plans that are in force in the district and which form part of the 'development plan' for their area.

The consultation runs from Tuesday 30 July to Tuesday 10 September 2019.

**Availability of documents**  
The Schedule of Main Modifications and changes to Policies Maps, Sustainability Appraisal Addendum Report and Habitats Regulation Assessment Addendum will be placed on deposit for public consultation for the duration of the 6 week consultation period. The purpose of the consultation is to determine whether the Main Modifications comply with legal requirements and are sound.

The Main Modifications should be considered alongside the DaSA Local Plan which can be viewed on the Council's website here:  
[www.rother.gov.uk/dasa](http://www.rother.gov.uk/dasa).

All of the above documents will be placed at the following deposit points for 6 weeks from Tuesday 30 July to Tuesday 10 September 2019.

- Rother District Council, Town Hall, Bexhill-on-Sea, TN39 3JX  
8.30am - 4.30pm Monday, Tuesday, Thursday & Friday, Wednesday 9.30am - 4.30pm
- Battle Almshouse, High Street, Battle, TN33 0EA  
9am - 2pm Monday - Friday
- Rye Help Point, 30a High Street, Rye, TN31 7JG  
9am - 5.30pm, Monday, Tuesday, Thursday & Friday, Wednesday 10.30am - 5.30pm, Saturday 9am - 5pm

Paper copies may be purchased online at: [www.rother.gov.uk/dasa](http://www.rother.gov.uk/dasa), or in person at the Bexhill Town Hall or by post from the address below. Cheques should be made payable to Rother District Council.

**How to make representations**  
Representations can be submitted online via the consultation portal at [www.rother.gov.uk/dasa](http://www.rother.gov.uk/dasa) emailed to [dasa.reps@rother.gov.uk](mailto:dasa.reps@rother.gov.uk) or can be submitted in writing to: Head of Service - Strategy and Planning, Modifications Consultation, Rother District Council, Town Hall, Bexhill-on-Sea, East Sussex, TN39 3JX.

All duly made representations on the Main Modifications will be passed on to the Inspector for consideration.

Representations may be accompanied by a request to be notified at a specific address (postal or electronic) of the submission of the Main Modifications to the Inspector; the publication of the recommendations of the Inspector; and the adoption of the Development and Site Allocations Local Plan.

This consultation is not an opportunity to re-state previous representations, as these are already with the Inspector. This is also not an opportunity to raise new objections to the Proposed Submission version of the DaSA, or to seek new changes to it.

**What else is available to comment on?**  
Additionally, as a distinct exercise which is not a part of the DaSA Local Plan Public Examination process, the Council is also undertaking a separate consultation on Additional (Minor) Modifications to the DaSA Local Plan. This consultation runs from Tuesday 30 July to Tuesday 10 September 2019. Copies of these Additional Modifications are available at [www.rother.gov.uk/dasa](http://www.rother.gov.uk/dasa) and on deposit at the locations detailed above. Representations can be made using the methods detailed above. Responses to these modifications will only be considered by the Council and not by the Inspector as they do not relate to the soundness of the plan.

**All representations must be received by the Council no later than 5pm on Tuesday 10 September 2019. Any submissions received after this deadline cannot be considered.**

Representations cannot be treated in confidence. Regulations require copies of all representations to be made publically available. The Council will also provide names and associated representations on its website but will not publish personal information such as telephone numbers, emails or private addresses.

Dr Anthony Leonard  
Executive Director

Date: 30<sup>th</sup> July 2019

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**What else is available to comment on?**  
Additionally, as a distinct exercise which is not a part of the DaSA Local Plan Public Examination process, the Council is also undertaking a separate consultation on Additional (Minor) Modifications to the DaSA Local Plan. This consultation runs from Tuesday 30 July to Tuesday 10 September 2019. Copies of these Additional Modifications are available at [www.rother.gov.uk/dasa](http://www.rother.gov.uk/dasa) and on deposit at the locations detailed above. Representations can be made using the methods detailed above. Responses to these modifications will only be considered by the Council and not by the Inspector as they do not relate to the soundness of the plan.

**All representations must be received by the Council no later than 5pm on Tuesday 10 September 2019. Any submissions received after this deadline cannot be considered.**

Representations cannot be treated in confidence. Regulations require copies of all representations to be made publically available. The Council will also provide names and associated representations on its website but will not publish personal information such as telephone numbers, emails or private addresses.

Dr Anthony Leonard  
Executive Director

Date: 30<sup>th</sup> July 2019



### Appendix 3: My Alerts Notifications

My Alerts DaSA notification – sent out on 2<sup>nd</sup> August for w/c 2<sup>nd</sup> August 2019



#### Development and Site Allocations (DaSA) Local Plan: Modifications Consultation

Following Examination, the Council has now published Main Modifications (including changes to Policies Maps) and Additional Modifications to the Proposed Submission DaSA Local Plan for a 6-week consultation from 30th July 2019 to 10th September 2019.

The DaSA implements the development strategy and core policies for the district, as set out in the Core Strategy. It does not include development allocations in Neighbourhood Plan areas.

Anyone wanting to make representations on the Modifications has six weeks to do so. Representations on Main Modifications (including changes to Policies Maps) will be forwarded to the Inspector who will assess whether they met the prescribed tests.

[Find out more](#)

My Alerts DaSA reminder notification – sent out on 30<sup>th</sup> August for w/c 2<sup>nd</sup> September 2019



## DaSA Local Plan: Modifications Consultation

Anyone wanting to make representations on the Modifications to the Proposed Submission Development and Site Allocations (DaSA) Local Plan, has less than two weeks left (up to 5pm on Tuesday 10th September) to do so. The Modifications to the Plan consists of the Main Modifications (including changes to Policies Maps) and Additional Modifications.

The DaSA implements the development strategy and core policies for the district, as set out in the Core Strategy. It does not include development allocations in Neighbourhood Areas.

[Find out more](#)

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## Dragon Boat Festival

The 22nd annual Dragon Boat Festival at Bewl Water takes place on Saturday 7th September. Up to 60 Dragon Boat teams with crews of 16 paddlers in fancy dress (plus a drummer) race in Chinese-style Dragon Boats over a 250-metre course. The Bewl Water site that looks onto the water will be full of tents and marquees, with many running stalls selling cakes and other goodies on the day.

[Find out more](#)