

Development and Site Allocations Local Plan



Options and Preferred Options for public consultation

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List of Policies/Options for consultation

Development Policies

Sustainable Resource Management

Policy DRM1: Water Efficiency
Options Renewable Energy

Communities

Policy DCO1: Retention of Sites of Social or Economic Value
Policy DCO2: Equestrian Development

Local Housing Needs

Options Affordable Housing - Thresholds
Policy DHG1: Residential Internal Space Standards
Policy DHG2: Accessible and Adaptable Homes
Options Housing for Older People
Options Self-build and Custom Housebuilding
Policy DHG3: External Residential Areas
Policy DHG4: Extensions to Residential Gardens
Policy DHG5: Extensions, Alterations and Outbuildings
Policy DHG6: Residential Annexes
Policy DHG7: Boundary Treatments
Policy DHG8: Accesses and Drives

Economy

Policy DEC1: Shopfronts and Advertising
Policy DEC2: Holiday Sites
Policy DEC3: Existing Employment Sites and Premises

Environment

Policy DEN1: Maintaining Landscape Character
Policy DEN2: The High Weald Area of outstanding Natural Beauty (AONB)
Policy DEN3: Strategic Gaps
Policy DEN4: Biodiversity and Green Space
Policy DEN5: Sustainable Drainage
Policy DEN6: Land Stability
Policy DEN7: Environmental Pollution

Implementation

Policy DIM1: Comprehensive Development
Policy DIM2: Development Boundaries

Site Allocations

Bexhill

- Policy BEX1: Land at Levetts Wood and Oaktree Farm, Sidley
- Policy BEX2: Land at Preston Hall Farm, Sidley
- Policy BEX3: Land at North Bexhill
- Policy BEX4: Land at Former High School Site and Drill Hall, Down Road, Bexhill
- Policy BEX5: Land at Gullivers Bowls Club, Knole Road, Bexhill
- Policy BEX6: Land adjacent to Cemetery Lodge /276 Turkey Road, Bexhill
- Policy BEX7: Land at Moleynes Mead, Fryatts Way, Bexhill
- Policy BEX8: Land south of Terminus Road
- Policy BEX9: Land off Spindlewood Drive, Bexhill
- Policy BEX10: Land at Barnhorn Green, Bexhill
- Options Northeye (Former United Arab Emirates - Technical Training Project)
- Policy BEX11: Sidley Sports and Social Club, Glovers Lane
- Policy BEX12: Bexhill Town Centre
- Policy BEX13: The Bexhill Primary Shopping Area
- Policy BEX14: Bexhill Cultural Area
- Policy BEX15: Land south-east of Beeching Road
- Options London Road - Sackville Road Enhancement Area
- Policy BEX16: Little Common and Sidley District Centres

Hastings Fringes

- Policy HAS1: Land at Michael Tyler Furniture, Woodlands Way, Hastings
- Policy HAS2: Land east of Burgess Road, Hastings
- Policy HAS3: Land north of A265, Ivyhouse Lane, Hastings
- Policy HAS4: Rock Lane Urban Fringe Management Area
- Policy HAS5: Combe Valley Countryside Park

Villages

Beckley/Four Oaks

- Policy BEC1: Land east of Hobbs Lane, Beckley Four Oaks
- Policy BEC2: Land south of Buddens Green, Beckley Four Oaks

Broad Oak

- Policy BRO1: Land west of A28, Northiam Road, Broad Oak
- Policy BRO2: Land south of the Rainbow Trout Pub, Broad Oak

Camber

- Policy CAM1: Land at the Former Putting Green Site, Camber
- Policy CAM2: Land at the Central Car Park, Camber

Catsfield

Policy CAT1: Land to the Rear of the White Hart, Catsfield

Policy CAT2: Land on Skinners Lane, Catsfield

Hurst Green

Policy HUR1: Land off Foundry Close, Hurst Green

Policy HUR2: Caravan Tech premises, High Street, Hurst Green

Iden

Policy IDE1: Land south of Elmsmead, Iden

Northiam

Policy NOR1: Land south of Northiam Church of England Primary School

Peasmarsh

Policy PEA1: Land south of Main Street, Peasmarsh

Rye Harbour

Policy RHA1: Land at the Stonework Cottages, Rye Harbour

Policy RHA2: Harbour Road Employment Area

Westfield

Policy WES1: Land at Westfield Down, Westfield

Policy WES2: Land at the former Moorhurst Care Home, Westfield

Policy WES3: Land off Goulds Drive, Westfield

Policy WES4: Land connecting Moor Lane and the A28

Gypsies and Travellers

Policy GYP1: Land adjacent to High Views, Loose Farm Lane, Battle

Guestling Green

Policy GUE1: Land at former highway depot, Guestling Green

Marley Lane

Policy MAR1: Land at Felons Field, Marley Lane

Rother Valley Railway

Policy RVR1: Rother Valley Railway

Part A: Context

1. Introduction
2. Strategic framework
3. Structure of the document
4. The plan-making process
5. Relationship with neighbourhood plans

1. Introduction

- 1.1. This is a public consultation document. It is the first stage in drafting detailed policies and proposals to deliver sustainable development in Rother District, as set out in the Local Plan Core Strategy, September 2014.
- 1.2. The Core Strategy (paragraph 1.9) identified the need to prepare this Plan to both set out more detailed 'development policies' for certain topics to assist in determining proposals and to identify specific 'site allocations' for development.
- 1.3. The site allocations relate primarily to identifying sites needed to deliver the quantum of housing, business and retail development (to which the Council is committed through the Core Strategy), hopefully in a manner that also takes full account of environmental and social objectives.
- 1.4. This first version of the Plan provides a basis for local residents, businesses and other interested parties to comment on the policy options and preferred options before any firm decisions are taken. As explained further in Chapter 5, there will be a further public consultation and an independent examination of the Plan before it is finally approved, or 'adopted'. At that point, it will, with the Core Strategy, provide the basis for determining planning applications, superseding all policies from the earlier 2006 Rother District Local Plan that still remain in force.
- 1.5. This consultation document presents the Council's emerging thinking based on evidence available at present, but it is recognised that further refinement will be needed in the light of comments made through this public consultation. It indicates the alternative policy approaches and sites that have been considered and, normally, sets out preferred development policies and site allocations. In some cases, notably where further assessments and/or understanding of local priorities are needed, alternatives are presented without a recommendation.
- 1.6. To help people contribute effectively, a series of questions on which views are specifically sought included in the document and on a separate response form. Full details of the consultation are being published and distributed separately.
- 1.7. The Council is encouraging a full and wide-ranging discussion of the policy options and preferred options to ensure that it develops the best plan to meet the overall needs of the District and of its communities.
- 1.8. *All comments made will be considered and the scope and content of policies reviewed in the light of them.*

2. Strategic framework

The Core Strategy

- 2.1. The draft development policies and site allocations in this document flow from the overarching development strategy and strategic policies of the [Rother Local Plan 'Core Strategy'](#), which was formally adopted by the Council in September 2014. It covers the period 2011-2028.
- 2.2. The Core Strategy may be regarded as “Part 1” of the Council’s Local Plan, with the Development and Site Allocations (DaSA) Local Plan being “Part 2”. It will have the same time horizon as the Core Strategy.
- 2.3. This Plan is expected to help achieve the Core Strategy’s ‘Vision’ and ‘Strategic Objectives’ and to facilitate delivery of its development targets. Indeed, there is a legal requirement for it to conform generally with the Core Strategy – as there is for Neighbourhood Plans (which are discussed more in Chapter 5).
- 2.4. Hence, the preparation of this Plan (or Neighbourhood Plans) is not an opportunity to change those strategic policies. Rather, it is to carry them forward in the most appropriate way.
- 2.5. The Core Strategy’s Vision is for the District to be recognised for its high quality of life and a strong emphasis on developing vibrant, safe, balanced and inclusive communities. Sustainable growth, including economic growth which encourages young people to stay in the area, and greater prosperity for all are seen as vital to this. There are supporting visions, objectives and strategies for Bexhill, Rye, Battle and the Rural Areas of Rother.

Development targets

- 2.6. The Core Strategy sets targets for the numbers of additional homes and business floorspace over the plan period. These targets balance the need for more homes, improving economic opportunities and social well-being with maintaining the special character and particular environmental qualities of the District that make it an attractive place to live.
- 2.7. The housing development target for the District as a whole is for at least 5,700 new homes to be built over the plan period. The majority, some 3,100, are expected to be at Bexhill, with 475-500 extra dwellings at Battle, 355-400 dwellings at Rye, at least 100 dwellings on the fringes of Hastings and 1,670 dwellings across villages. Of course, there have been a number of homes built since the Core Strategy was prepared (with an April 2013 base date), as well as new planning permissions granted. Chapter 12 presents an update of housing requirements for all towns and villages for which a need for further allocations is indicated in the Core Strategy.

- 2.8. The Core Strategy also looks to provide for at least 100,000 square metres (sqm) of additional business floorspace over the plan period, with respective minimum requirements of 60,000sqm at Bexhill, 10,000sqm at Battle (including Marley Lane), 10,000-20,000sqm at Rye/Harbour Road, 3,000sqm in the Hastings fringes and 10,000sqm across the Rural Areas. Chapter 12 summarises the progress to date and outstanding quantitative and qualitative requirements.

'Core' development policies

- 2.9. In addition to its spatial strategies, the Core Strategy also sets out a number of overarching 'core', or strategic, policies that address key issues facing the District under the following themes:

- Sustainable Resource Management
- Communities
- Local Housing Needs
- Economy
- Environment
- Transport and Accessibility
- Implementation and Monitoring

- 2.10. The full list of Core Strategy's policy subjects, which should be read in conjunction with policies in this Plan, is reproduced at Appendix 1 for ease of reference.

National Planning Policy Framework

- 2.11. National planning policies are contained in the 'National Planning Policy Framework' (NPPF). Local planning policies should be consistent with national planning policies, unless there are reasons justifying a local exception. Similarly, it is a material consideration in determining applications.
- 2.12. The NPPF sees purpose of the planning system in terms of contributing to "sustainable development", which it defines in terms of three dimensions – economic, social and environmental – with gains sought in each simultaneously.
- 2.13. It includes a 'presumption in favour of sustainable development', which is applied in the local context through Policy PC1 of the Core Strategy.
- 2.14. The NPPF is supported by 'Technical Guidance', which provides additional guidance on development in areas at risk of flooding and a separate 'Planning policy for traveller sites', as well as extensive 'Planning Practice Guidance'.

Other development plans

- 2.15. Waste and Minerals:** East Sussex County Council is responsible for waste and minerals planning. The 'East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan', 2013, also forms part of the statutory development plan for the area and provides the strategic framework in relation to proposals for such uses. It will be supplemented by a 'Waste and Minerals Sites Plan'. This document is currently in production but, when adopted, it will supersede remaining allocations from the Waste Local Plan (2006) and the Minerals Local Plan (1999). The Inspector's report of the Examination of the Waste and Minerals Sites Plan was published on 7th November 2016. Of note, it proposes that an area known as Broomhill, near Lydd is safeguarded as a mineral resource. Further details are available from the County Council.
- 2.16. Marine planning:** As acknowledged in the adopted Core Strategy, the Council will also have regard to the UK Marine Policy Statement, along with Marine plans and designations, as these are developed, to ensure integration with the marine planning regime. In particular, the Marine Management Organisation's (MMO) emerging South Inshore and South Offshore Marine Plans will establish a framework for marine and coastal activity that will operate in parallel to the terrestrial planning regime.
- 2.17. The [Marine and Coastal Access Act 2009](#) establishes the local authority duty in this regard and Section 42 of the Act defines the marine area to include "the waters of every estuary, river or channel, so far as the tide flows at mean high water spring tide". Land use planning has responsibility to the mean low water mark, meaning Rother District Council shares responsibility with the MMO for the intertidal zone, which includes the tidal waters of any estuary, river or channel. Proposals within such areas will therefore need to be in accordance with current Marine Planning Policy¹.
- 2.18. Spatial components of particular relevance to policies within the South Marine Plans can be viewed via the publically accessible [Marine Information System](#)².
- 2.19. Development plans of neighbouring authorities:** In line with the NPPF's 'duty to cooperate', the Core Strategy was prepared in collaboration with adjoining authorities in relation to cross-boundary strategic issues. Of note, it contains a shared vision for Hastings and Bexhill, mirroring that contained in the Hastings Planning Strategy, also adopted in 2014. Both Authorities' Local Plans are also supported by joint work to determine the development needs of our shared housing and economic market area. This cooperation has continued, with policies for sites in the Hastings Fringes in this document dovetailing with ones in Hastings. In addition, a joint 'Playing Pitch Strategy' has very recently been prepared.
- 2.20. A number of topic-based policies have also been prepared with regard to those of neighbouring authorities, whilst still recognising potentially different local contexts and priorities. Examples relate to the High Weald AONB and equestrian development. Cooperation will continue as part of the evolution of the DaSA Local Plan.

¹ In the absence of an adopted plan for the South marine plan areas, this is the Marine Policy Statement.
² Expected to be live for the South Marine area (which includes Rother's coastline) from Spring 2017.

3. Structure of the document

The structure of this consultation document has the following structure:

Part B: Development Policies:

- 3.1. These complement the 'core policies' already included in the adopted Core Strategy (and those in the NPPF) and relate to topics where further elaboration is considered necessary to provide a proper basis for local development management.
- 3.2. They are laid out under the Core Strategy's thematic headings, as highlighted in Chapter 2. For the main part, these are generic policies that would apply to a relevant situation anywhere in the District, but also includes policies relating to certain localities, notably in relation to land inside or beyond development boundaries' (although individual boundaries are contained in Part C) and developments in the High Weald AONB, in 'Strategic Gaps' (being tracts of land between the settlements identified in Policies HF1 and RY1 of the Core Strategy) in the Pevensey Levels hydrological catchment and in parts of Fairlight where there are coastal erosion and drainage issues.

Part C: Site Allocations:

- 3.3. Chapters in this Part of the Plan set out site specific proposals that are being proposed to meet the requirements of the Core Strategy.
- 3.4. It covers Bexhill and villages that are not covered by ongoing Neighbourhood Plans – see Chapter 5 below.
- 3.5. These proposals not only deal with new housing development, but also include, for example, proposals regarding business and retail uses and open space.
- 3.6. All existing settlement development boundaries, again excluding those covered by Neighbourhood Plans, are also reviewed.
- 3.7. There is a specific policy in relation to the Rother Valley Railway.

Maps

- 3.8. The final version of the DaSA will contain a district-wide 'Policies Map', identifying the coverage of a series of component 'Inset Maps' and which identifies the location of spatial policies. For consistency, draft policies in this Options and Preferred Options document cross-refer to the Policies Map, which should be taken to relate to the individual (Inset) Maps for each site at this stage.

The plan-making process

4. The plan-making process

Preparation of the 'Options and Preferred Options' document

- 4.1. Preparation of this first 'Options and Preferred Options' version of the Development and Site Allocations (DaSA) Local Plan has drawn on earlier evidence and views expressed during the Core Strategy process, as well further evidence gathering, assessments and consultations with neighbouring and local Councils. Consideration has also been given to information provided by landowners and other interests regarding sites they wished to be assessed as potential development sites.

Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA)

- 4.2. This is a requirement of such land-use plans to help ensure that they contribute to achieving sustainable development. The SA/SEA assesses reasonable policy options, as well as the preferred policies, against sustainability objectives in accordance with a Scoping Report that is agreed with the Statutory Environmental Bodies – Natural England, the Environment Agency and Historic England.
- 4.3. Both the Scoping Report and the full SA/SEA Assessment, covering both development policies and site allocations, are published as separate documents accompanying this Plan.

QUESTION 1: Do you have any comments on the supporting Sustainability Appraisal (SA/SEA) that is published alongside this document?

Habitats Regulations Assessment

- 4.4. A Habitats Regulations Assessment (HRA) was undertaken for the Core Strategy to consider the potential impacts of the development strategy on international sites of nature conservation importance - being primarily the Dungeness Complex of sites that straddle the Rother/Shepway boundary in the east of the District and the Pevensey Levels, straddling the Rother/Wealden boundary in the south-west of the District.
- 4.5. The HRA found that its policies for the quantum and distribution of housing, (specific to individual settlement level) and its core policies would be acceptable in terms of their impacts, subject to certain provisos. In particular, it sought:
- the production of a suitable 'Sustainable Access Strategy' for the Dungeness complex of international nature conservation sites; and
 - the provision of sustainable drainage systems (SUDs) within the Pevensey Levels hydrological catchment.

- 4.6. In relation to the Dungeness Complex, a usage survey has been completed and a Sustainable Access Strategy is being prepared in partnership with Shepway District Council, Natural England and other stakeholders.
- 4.7. A further 'Screening Report' has been prepared for this Local Plan. This concludes that it is not considered likely to result in significant adverse effects on the integrity of European sites or associated sensitive areas, either in isolation or in combination (including with other plans and policies). This is subject to the requirement for continued conformity with Core Strategy policies. By implication, should policies emerge that deviate significantly from the Core Strategy, then the Plan may need to be screened in and re-assessed once more, as well as possibly subject to more detailed appropriate assessment.

Evidence documents

- 4.8. Several further studies have been undertaken, notably to provide a clearer basis for:
- defining strategic countryside gaps defined in the Core Strategy;
 - calculating affordable housing financial contributions;
 - identifying playing pitch requirements;
 - applying 'green infrastructure principles';
 - determining the most appropriate approach to the future of existing employment sites and identification of further sites to meet Core Strategy targets;
 - identifying renewable energy opportunities; and
 - a landscape and ecologically-led approach to development at North Bexhill.

Contributing to the plan-making process

- 4.9. Full details of how to make representations, together with a Comments Form are available on the Council's website www.rother.gov.uk/dasa or from the Planning Policy Team (planning.strategy@rother.gov.uk).
- 4.10. Questions are asked at the end of each section about the policy choices to be made. In replying, you may wish to consider:
- *Is the policy/proposal needed?*
 - *Is the policy or proposal the best way of achieving the relevant Core Strategy objective or broad policy?*
 - *Is there anything that makes the policy or proposal unacceptable?*
 - *Are appropriate options put forward and is the best option chosen?*
 - *Are there any further development policies needed?*
 - *Are potential development sites considered in the right way?*
 - *Are the better options preferred and, if not, which should be preferred?*
 - *Are there other sites that should be considered?*

The plan-making process

- 4.11. After the current public consultation, the Council will carefully consider all comments made. It will report on the range of comments made and how the DaSA Local Plan is to be refined in response. This will cover reviewing the scope of policies, refining options and, if necessary, amending the wording of policies.
- 4.12. At that point, the final draft ('Proposed Submission') version of the DaSA Local Plan will be published and there will be a further opportunity to make representations, before it is submitted to the Government for public examination. The intention is to produce the proposed Submission Plan in late Spring/early Summer 2017.
- 4.13. The timing of the public examination will depend upon the number and nature of representations, and, whether further work is necessary. The Council's latest Local Development Scheme will contain the up-to-date programme of future stages.
- 4.14. If the Inspector finds the Council's submitted document to be "sound", it will then be adopted as part of the statutory development plan. At that point, the outstanding saved policies of the previous 2006 Local Plan, as listed in Appendix 2, will be formally superseded.

5. Relationship with neighbourhood plans

- 5.1. The Localism Act 2011 introduced neighbourhood planning in England to give communities more of a say in the development of their local area. It enables parish (including town) councils in parished areas and duly constituted 'neighbourhood forums' elsewhere to draw up a Neighbourhood Plan for their area. When adopted, they have the same status as local plans.

Neighbourhood Planning in Rother

- 5.2. There are nine neighbourhood plans now in preparation in Rother. These are at: Battle, Burwash, Crowhurst, Etchingham, Fairlight, Robertsbridge, Rye, Sedlescombe and Ticehurst. Figure 1 below highlights the various stages each emerging Neighbourhood Plan has reached in the process¹.

Neighbourhood plans contributions to meeting development targets

- 5.3. The National Planning Policy Framework states that a neighbourhood plan should support the strategic development needs set out by the Council's strategic policies – which, in Rother, are those policies contained in its Core Strategy (or any subsequent amendment to those). It further states that: 'Neighbourhood plans and order should not promote less development than set out in the Local Plan or undermine its strategic policies.' (Paragraph 184)
- 5.4. It follows that neighbourhood plans will play a significant part in meeting the overall housing target. Hence, it is expected that each neighbourhood plan will meet their housing target as a minimum.
- 5.5. Furthermore, given the need to be able to demonstrate that the DaSA and neighbourhood plans will together provide sufficient sites to meet the Core Strategy's requirements for housing and employment land, all the plans need to be in place at approximately the same time. Indeed, in view of the current pressure on housing land supply, it is vital for all communities to have plans in place as soon as practicable.
- 5.6. The Council will continue to support the efficient preparation of neighbourhood plans and encourage the early development of sustainable and deliverable sites in order to help contribute to both local and the District-wide housing land supply.

1 As of the 1st October 2016

Relationship with neighbourhood plans

Different Stages of Neighbourhood Planning

Stage 1: Designating neighbourhood area

Stage 2: Preparing a draft neighbourhood plan

Stage 3: Pre-submission publicity & consultation

Stage 4: Submission of a neighbourhood plan to the local planning authority

Stage 5: Independent Examination

Stage 6: Referendum

Stage 7: 'Making' the neighbourhood plan (Bringing it into force)

Figure 1. Neighbourhood Planning in Rother at 1 November 2016

	Stage						
	1	2	3	4	5	6	7
Battle Town Council	●	●					
Burwash Parish Council	●	●					
Crowhurst Parish Council	●	●					
Etchingham Parish Council	●	●					
Fairlight Parish Council	●	●					
Rye Town Council	●	●					
Salehurst and Robertsbridge Parish Council	●	●	●				
Sedlescombe Parish Council	●	●	●	●			
Ticehurst Parish Council	●	●					

Part B: Development Policies

6. Resource management

Water efficiency

Renewable and low carbon energy

7. Communities

Retention of sites of social or economic value

Equestrian developments

8. Housing

Affordable housing

Access to housing and space standards

Self-build and custom housebuilding

External residential areas

Extensions to residential gardens

Extensions, annexes, alterations and outbuildings

Boundary treatments, accesses and drives

9. Economy

Shopfronts and advertising

Holiday sites

Existing employment sites and premises

10. Environment

Landscape and the High Weald Area of Outstanding Natural Beauty

Strategic Gaps

Biodiversity and green space

Sustainable drainage

Land stability

Environmental pollution

11. Implementation

Comprehensive development

Development boundaries

6. Resource management

Water efficiency

- 6.1. The Council's adopted Local Plan Core Strategy Policy SRM2 states:

'Effective management of water resources will be supported by:

(v) Ensuring that all development incorporates water efficiency measures appropriate to the scale and nature of the use proposed.'

This section considers how this broad policy commitment may be taken forward.

- 6.2. Water is recognised as being a finite resource and, in common with the rest of south-east England, Rother is identified as an area of 'serious' water stress¹. This takes account of both existing and future demand.
- 6.3. While both water suppliers in the area, Southern Water and South East Water, have indicated that they can accommodate the level of planned development in the district, it is acknowledged that there will inevitably be pressure to manage existing water resources more effectively, not least because of restrictions on abstraction, notably on the Pevensey Levels, and the cumulative effects of development across the wider area.
- 6.4. Both suppliers have business objectives to sustain the existing water reserves by implementing efficiency measures, reflecting a clear legislative steer. Central to water efficiency is the programme of both local water suppliers for the installation of water meters. The Government has also said that Councils can play a part through their local plans by applying an optional standard for water efficiency in new homes as provided for by the Building Regulations where there is a clear need and does not prejudice the viability of development and housing delivery.
- 6.5. The mandatory default Building Regulations standard is 125 litres/person/day, while the higher optional standard of 110 l/d/p. To meet the relevant regulatory requirements², it will be necessary to demonstrate compliance via a calculation of the water usage (from mains supply) of sanitary appliances and white goods provided and installed. All products supply datasheets which outline the water consumption based on output of litres/ minute. Applicants can calculate the estimated use with the methodology in the [Water Efficiency Calculator](#)³ or use Table 2.2 in Building Regulations Part G 2015 which sets out the maximum fittings consumption levels.

1 Environment Agency paper '[Water Stressed Areas - Final Classification](#)' published in 2013.

2 Part G of Schedule 1 and regulation 36 to the Building Regulations 2010, as amended.

3 [The Water Calculator](#) is an online tool which can be used to assess the efficiency and water consumption of many products.

- 6.6. The level of water stress is clear evidence that water efficiency measures are needed in this area. This is consistent with the overarching South East River Basin Management Plan: [Water for life and livelihoods Part 1: South East River Basin District Management Plan \(2015\)](#). This specifies key actions for the catchment basins to meet the objectives of the Water Framework Directive including regulating the amount of water extraction and states:
- ‘Dealing with unsustainable abstraction and implementing water efficiency measures is essential to prepare and be able to adapt to climate change and increased water demand in future’.*⁴
- 6.7. Amongst other recommendations, it encourages that: ‘Local government sets out local plan policies requiring new homes to meet the tighter water efficiency standard of 110 litres per person per day as described in Part G of Schedule 1 to the Building Regulations 2010.’⁵
- 6.8. Furthermore, the Environment Agency’s [Rother Abstraction Licensing Strategy \(2013\)](#) states “Water efficiency and the reduction in household water demand are crucial elements of good water resource management planning especially as the South East is under increased pressure from climate change and population growth”.
- 6.9. Having regard to the marginal additional costs of adopting the higher standard, as advised by the Government⁶, it is evident that this is an achievable standard for house builders to implement. It will also benefit new home-buyers in terms of reducing their water usage, and associated costs.

Policy options:

Government only allows application/adoption of two alternatives:

Option A: Apply the base water efficiency standard.

Option B: Apply the higher optional water efficiency standard.

It is clear from the forgoing overview of the legislative, policy and local water supply conditions that there is a strong case for seeking to maximise water efficiency through the planning system in Rother district. It is also evident that the cost of doing so is very small, such that there is no viability reason for not doing so. Given that the tests set out in the Government’s statements relating to the optional standard are met, as well as there being an existing strategic policy commitment in the Local Plan Core Strategy, then Option B is the preferred policy approach.

The SA/SEA of these options confirms the advantages of Option B in terms of water resource objectives, as well as potentially reducing pressure for abstraction and hence on ecology. The proposed policy wording is set out below.

4 South East river basin management plan - Part 1 (Water Resource Sustainability Measures p58)
5 South East river basin management plan - Part 1 Changes to natural flow and levels of water (p44)
6 [Housing Standards Review Cost Impacts](#) DCLG, September 2014

Policy DRM1: Water Efficiency

New development should plan positively to minimise its impact on water resources. All new dwellings are required to be designed to achieve water consumption of no more than 110 litres per person per day.

- 6.10. This policy will be implemented through the Building Regulations, while planning applications for new homes will be expected to be accompanied by a 'letter of intent' confirming the dwellings will adhere to the standard 110 litres/per day/per person.

QUESTION 2: Do you agree that the optional water efficiency standard should be adopted and the proposed policy wording?

Renewable and low carbon energy

- 6.11. The Government's National Planning Policy Framework expects local planning authorities to have a positive strategy to promote energy from renewable and low carbon sources. In response, the Core Strategy has, through Policy SRM1: 'Towards a Low Carbon Future', a strategy to mitigate and adapt to the impacts of climate change.
- 6.12. The Core Strategy was supported by a 'Low Carbon & Renewable Potential Study' (2010). A further Background Paper has been prepared to provide further evidence on opportunities for 'Energy from Renewable and Low Carbon Sources'. Both of these are published on the Council's website.

Low carbon energy generation schemes

- 6.13. This Core Strategy Policy includes support in principle for renewable and low carbon energy generation schemes, particularly those utilising solar, biomass and wind energy technologies, that: (a) do not have a significant adverse impact on local amenities, ecological and heritage assets or landscape character, and (b) in respect of locations in or adjacent to the High Weald AONB and other sensitive landscapes, are generally small in scale.
- 6.14. Government guidance advises that when drawing up a Local Plan, local planning authorities should first consider what the local potential is for renewable and low carbon energy generation and consider:
- the range of technologies that could be accommodated and the policies needed to encourage their development in the right places; and
 - the impacts of different technologies and how they may vary by place.
- 6.15. Therefore, there remains the opportunity to put forward more spatially specific policies identifying appropriate locations for, and approaches to, different potentials. In fact, in respect of wind energy development, the Government¹ advises that such developments should be in an area identified as suitable for wind energy development in a local or neighbourhood plan, and that communities concerns are addressed.
- 6.16. The recent Background Paper indicates the potential for wind turbines, based on prevailing wind speeds. Areas outside of the High Weald AONB and international nature conservation areas include the west/north-west of Bexhill and western edges of Hastings. There are also areas of wind energy potential within the High Weald AONB, earlier reports have indicated that these should not automatically be ruled out, suggesting that there may be scope in particular localised areas for a smaller (1.5-2MW capacity) single turbine or small clusters of up to three turbines.

1 [Written ministerial statement](#) on 18 June 2015

QUESTION 3: Where, if anywhere, do you think could be an appropriate location for wind turbine(s) to be sited in the District?

- 6.17. The use of biomass as a fuel offers significant benefits, both in encouraging sustainable woodland management as well as in generating energy from a renewable resource. However, large-scale biomass plants do not appear to be likely to be viable, notwithstanding the scale of the potential resource, due to its highly fragmented nature. Nevertheless, small-scale biomass plants (particularly those using local wood fuel) may be viable.
- 6.18. The considerations that will inform the determination of planning applications will substantially depend upon the scale of the biomass burner. It is most likely that it would serve a single user, which may be relatively large, such as a school or commercial building, or a single dwelling.
- 6.19. Consideration may be given to encouraging suitable commercial buildings to be heated by biomass boilers and for residential properties to be designed to accommodate them, or wood burners, which essentially means providing working chimneys or flues.

QUESTION 4: What opportunities do you think there are to encourage biomass/wood fuel from local sources and how should these be reflected in planning policy?

- 6.20. Solar energy is another potential source of heat. Much solar equipment falls within planning control. Where permission is required for a proposal in the High Weald AONB, on a Listed Building or in a Conservation Area, existing policies would require that the objectives of those designations should always be respected.

Energy options in new development

- 6.21. Core Strategy Policy SRM1(i) promotes renewable and low carbon energy through its requirements for an energy strategy for residential developments of 10 or more dwellings and non-residential schemes of at least 1,000sqm of floorspace. Also, larger schemes, of 100 dwellings (or 50 flats) are required to consider the potential for combined heat and power generation (CHP).

- 6.22. The Core Strategy recognised that these thresholds may need to be reviewed and evidence to date is that the requirement for an energy strategy appears to be at least perceived as an unduly onerous expectation from smaller developments and has not been secured. Also, the threshold for CHP is also too low and could not be secured even at North East Bexhill. A higher threshold for an energy strategy, or 'statement', may be more reasonable for developments of more than 50 dwellings or non-residential developments of 5,000sqm or more floorspace.
- 6.23. Whichever threshold is applied, it is proposed to issue practice guidance advising on the nature of such an energy statement. Also, it is considered reasonable to clarify that, at any scale of development, a scheme that positively embraces options for renewable and low carbon energy will be a factor weighing in the favour of a proposed development.

QUESTION 5: What thresholds should apply to the requirement on developers to submit an 'energy statement'?

7. Communities

Retention of sites of social or economic value

- 7.1. Community facilities, shops, tourism accommodation and business premises all play an important social and economic role within the District, making a positive contribution to maintaining and developing sustainable communities.
- 7.2. At the same time, commercial pressure for such sites and premises to change to alternative higher-value uses, notably housing, is strong. This often leads to local objections about the loss of facilities, notably shops and public houses, and the lack of sufficient job opportunities, especially for young people, when proposals come forward to convert or redevelop such sites for other purposes. Erosion of “sustainable communities” is at the heart of concerns.
- 7.3. It follows that it is vital to provide a clear policy framework to ensure that such uses, of social and economic value are normally retained, and their loss resisted unless it is evident that they cannot be maintained or that their continued use would perpetuate real harm to local amenities in some way.
- 7.4. This general approach is already established through the Local Plan Core Strategy; Policy CO1 sets the principles for retaining sites and premises currently or last in community use, as does Policy EC3 for employment space and Policy EC6 in respect of tourism accommodation. The Core Strategy’s spatial policies are also relevant, notably Policy RA1, which looks to retain local shops, services and public houses in villages.
- 7.5. However, while laying down basic principles, these policies do not go so far as to detail the requisite marketing and viability evidence required to properly consider a proposal that would result in the loss of such a valued use or facility.
- 7.6. To satisfy the policy test regarding whether there is a reasonable prospect of continued use, marketing will normally be required. A comprehensive, sustained campaign must be undertaken, offering the premises for sale as a going concern or for rent, at a realistic valuation of the premises for the permitted use. Ordinarily, the marketing campaign should run for a period of at least 18 months before the planning application is submitted; the premises should be offered for sale locally and regionally, in appropriate publications including through appropriate trade agents. Details should accompany relevant planning applications.
- 7.7. Sites should be advertised with the option for use as an alternative commercial or community facility, or restaurant or other use falling within the ‘A’ or ‘C1’ use classes, subject to suitability in line with other policies in the Local Plan. Where applications relate to a public house, the property should be advertised free of tie and restrictive covenant. Applications should also have full regard to the provisions set out in the CAMRA Public House Viability Test.

- 7.8. Where ongoing financial viability is at issue, the Council will require submission of trading accounts, normally for the last three full years in which the business was operating on a full-time basis. In schemes affecting tourism uses, consideration will also be given to the adequacy of marketing measures to attract holiday lettings. Where viability evidence is submitted, the Council would normally obtain independent verification, to be undertaken at the developers expense.
- 7.9. Amenity spaces attached to public houses and community facilities in particular can be subject to similar pressures for residential redevelopment. In order that the sustainability of the particular social or economic use is not prejudiced, the policy embraces consideration of the need to retain adequate amenity space (internal and external) and parking. Therefore, it also identifies a need to resist the loss of features such as gardens, car parks and function rooms, where this would threaten to undermine retention of a community or economic use.

Policy options:

Option A: No further policy (but rely on general presumptions established by the relevant Core Strategy policies)

Option B: New policy for each type of use.

Option C: New policy covering all types of economic and social uses.

Option A recognises that the Core Strategy has specific policies relating to a number of different uses, albeit that the employment sites policy is subject to the review of sites undertaken for this Plan, while support for the retention of village shops, services and public houses is also only expressed in general terms. Option B is based on there being different approaches to the retention of, for example, a business site compared to a public house, while Option C presents a common set of principles about prior marketing and viability.

The combination of the economic pressure on retaining community (i.e. leisure, recreation, cultural) activities and employment sites, allied with their value in social and economic terms, leads to the view that further policy guidance would be helpful to clarify expectations on processes to be followed.

The SA/SEA of these options shows that Options B and C compare very similarly, albeit that Option B gives somewhat more of a focus on the specific needs and, hence, is potentially more effective.

In conclusion, setting out the tests to be applied to retaining sites of social or economic value will be very helpful in ensuring that the general principles established in the Core Strategy for each type of use are carried through. It is found that the tests in terms of marketing are similar and, hence, can be covered by a single policy, as proposed under Option C. Where there are use-specific considerations, these can also be brought out in that policy.

Hence, Option C is the preferred policy approach, with scope to add further detail if necessary relating to specific uses.

The proposed policy wording is set out below.

Policy DCO1: Retention of Sites of Social or Economic Value

In accordance with the presumptions set in the Local Plan Core Strategy, where developments are proposed that involve the loss or diminution of sites of social or economic value, including those currently or last in use as a community facility, public house, shop, tourist accommodation or business premises, in order to demonstrate that there is no reasonable prospect of a continued use, proposals must be supported by either:

- (i) evidence of a comprehensive and sustained marketing campaign, which clearly indicates a lack of demand for the existing use (or as an alternative commercial or community facility, where appropriate), based on marketing, normally at least 18 months, that offers the land or unit/s for sale as a going concern, or rental, at a realistic valuation of the site/premises for that use; or
- (ii) clear evidence that demonstrates that the unit is not financially viable.

Proposals should not result in the loss of facilities or features which may undermine the viability of its use, including, but not limited to, car parks, gardens and function rooms.

QUESTION 6: Do you agree with the policy approach to the retention of sites of social or economic value and the proposed policy wording?

Equestrian developments

- 7.10. The Rother area continues to be a popular area for equestrian activities. Its countryside provides an attractive context for horse riders and there is a good network of bridleways throughout the District.
- 7.11. While there are a limited number of larger commercial centres in the District, it is small-scale facilities for individual and private pursuit that predominantly come forward as planning applications. Typically, proposals for stables will include a tack room as well as external hard-standings and manure bays, but may also include sand schools, fencing and jumps, as well as new accesses from the highway.
- 7.12. Core Strategy Policy RA2 is supportive of recreation and leisure facilities in the countryside where they are compatible with the rural character of the area.
- 7.13. A balance needs to be struck between meeting the desires of the equestrian community and at the same time safeguarding the intrinsic value and locally distinctive rural character and landscape features of the countryside. This is especially the case in the High Weald AONB, the conservation and enhancement of which is afforded great weight.
- 7.14. The High Weald landscape is particularly vulnerable to development, including on the fringes of settlements. New buildings and hard surfaces – access roads or sand schools – are not always easily accommodated without some impact on the fields, small woodlands and farmstead meadows which make up the essential character of the AONB. Much of the rural area beyond the AONB is sensitive for other reasons; notably, the lower and open levels extending eastwards towards the Romney Marsh, are ecologically sensitive and subject to national and international protection.
- 7.15. The keeping of horses is recognised as a countryside pursuit but associated development must be carefully controlled, primarily for landscape reasons. This is particularly the case to manage the increasing pressures from proposals for new isolated stables and, at the other extreme, from a cumulative impact of stabling and equestrian facilities in a concentrated area.
- 7.16. Other than the possibility of utilising former farm or other commercial buildings for new uses, there is limited scope within the countryside to accommodate further commercial equestrian enterprises. However, there is scope for equestrian development in the countryside that is limited in scale.

- 7.17. Ideally, new development should be sited close to existing built development, close to the bridleway system and should preferably utilise mobile field shelters, although this is not always practicable. Where applications come forward in more remote locations and permanent buildings are required, new development will be expected to meet a number of criteria aimed at protecting the character of the countryside and the amenities of both local residents and users of the countryside. Particular control is necessary over the location of any new development and over the size, siting and design of all new buildings and associated facilities. Floodlighting is not appropriate in the countryside, neither are extensive access roads, or excavations other than of a minor nature to enable the formation of a sand school (or manège).
- 7.18. In assessing applications adequate provision should also be made for the safety and comfort of horses in terms of land for grazing and exercising. Such provision will help to address the issue of the excessive sub-division of fields and over grazing/loss of soil structure. While there is not a common standard applicable throughout the plan area, depending on how the horses are kept and the nature of the land, a desirable guideline would suggest stocking at a density of one hectare per horse¹.

Policy options:

First consideration is given to whether a specific equestrian policy is required. However, reliance on Core Strategy policy relating to leisure and recreational use in the countryside (Policy RA2) and the provisions of the NPPF is not regarded as a reasonable option, given the number of equestrian developments coming forward in the District, its substantial High Weald AONB coverage and the useful role of the saved 2006 Rother District Local Plan equestrian Policy CF5 – which will be superseded when this new Plan is adopted.

Hence, two options have been considered and subject to Sustainability Appraisal:

Option A: A positively promotional approach to equestrian development, encouraging both recreational and commercial proposals for the economic and leisure benefits, still with general safeguards.

Option B: A potentially more restrictive policy with more focused criteria to safeguard against the potential harm to the intrinsic character of the countryside and particularly the High Weald AONB.

The SA/SEA of these options shows that Option B is largely justified in terms of being more sensitive to important environmental considerations, notably in terms of conserving High Weald AONB countryside character. However, Option A shows that there may be scope to mitigate the sometimes uncertain negative impacts of different types of proposals to ensure that they are not unnecessarily prevented. Hence, a more detailed policy that addresses the range of equestrian developments and associated considerations, against a clear backcloth of the weight to be attached to ensuring that they are sensitive to their context to be acceptable, is favoured.

1 Managing Land for Horses Kent Downs AONB (2011)

The proposed policy wording, which consolidates the earlier, and quite effective, 'saved' 2006 Local Plan Policy CF5, is set out below.

Policy DCO2: Equestrian Developments

Proposals for equestrian developments should, individually and cumulatively, safeguard the intrinsic and locally distinctive character and amenities of the countryside, with particular regard to the conservation of the High Weald AONB.

In addition, proposals should accord with the following criteria, as applicable:

- (i) the siting, scale and design, including materials and boundary treatment, of any new buildings or facilities should be appropriate to their rural setting;**
- (ii) proposals should not be sited in prominent or isolated locations;**
- (iii) all proposals and especially sand schools and commercial riding schools, livery stables and related facilities, should be satisfactorily integrated with existing buildings;**
- (iv) any associated floodlighting, earthworks, new access routes or ancillary structures, including storage facilities, manure bays hard-standings, fencing and jumps, should not have an adverse impact on the surrounding countryside and local residential amenities; and**
- (v) adequate provision should be made for the safety and comfort of horses in terms of the land for grazing and exercising, notably in the consideration of stabling proposals; commercial riding schools, livery stables and other commercial facilities should have satisfactory access to the public bridleway network without the use of unsuitable roads and in all cases not adversely impact on road safety.**

In some circumstances, conditions (such as the removal of permitted development rights for fencing and external storage) may be applied where it is considered that there is the need to control potential adverse landscape impacts which can arise from the poor management of sites. Permission may also be subject to the removal of excessive or inappropriate fencing which has already taken place.

QUESTION 7: Do you agree with the policy approach to equestrian developments and the proposed policy wording?

8. Housing

Affordable housing

- 8.1. The requirement for affordable housing to be a part of new developments is a recognised means whereby the planning system can contribute to improving access to housing for households not able to purchase or rent on the open market. In this way it promotes balanced and inclusive communities.

Core Strategy provisions

- 8.2. In light of the relatively high median house price/earnings affordability ratio in Rother – see table below - the Local Plan Core Strategy regards affordable housing as a strategic policy issue and requires between 30-40% affordable housing, depending on location, on new developments above certain size thresholds in the District. These requirements are set out in Core Strategy Policy LHN2:

- Bexhill - 30%
- Hastings Fringes - 30%
- Rye - 30%
- Battle - 35%
- Rural Areas - 40%

House price to earnings ratio, 2014

England and Wales	9.17
South East	10.05
East Sussex	10.55
Hastings	7.33
Rother	12.94

- 8.3. The size of sites which trigger the requirement also vary, with a threshold of 15 dwellings for Bexhill and the Hastings Fringes, 10 dwellings at Rye and Battle, and 5 dwellings in the Rural Areas. Also, in rural areas, the policy seeks a financial contribution from schemes of less than 5 dwellings towards affordable housing.
- 8.4. The reasons for the different requirements reflected the levels of affordable housing need relative to planned supply, as well as the anticipated contribution to supply from different sizes of sites in the respective areas and local factors. In effect, as smaller sites predominate in the rural areas, a higher requirement and lower threshold are appropriate. The impacts of these requirements on viability were duly considered and it found that, for the vast majority of schemes, they would not prejudice viability.

National Planning Practice Guidance (PPG)

- 8.5. The PPG has recently been updated following the order of the Court of Appeal in May 2016, which gave effect to the policy set out in the [Written Ministerial Statement of 28 November 2014](#). This sets a national approach whereby affordable housing or tariff-style contributions should not be sought from developments of 10 units or less (and have a maximum combined gross floorspace of no more than 1,000sqm) but does allow local planning authorities to seek affordable housing contributions from developments of between 6 and 10 units in the form of cash payments (commuted until after completion of units within the development) in designated rural areas, which includes Areas of Outstanding Natural Beauty.

Review of Options

- 8.6. As can be seen, the current Core Strategy affordable housing thresholds and financial contributions requirements are no longer consistent with national policy guidance. Hence, it is necessary to review the thresholds in the Core Strategy policy.
- 8.7. There have been no planning application appeals locally that have examined this issue and, while cases elsewhere have variously found for the new national position and the local policy, they turn on local circumstances, with clear evidence needed to justify a departure from the national thresholds.
- 8.8. Further assessment of the most appropriate position is regarded as necessary, as the Core Strategy pre-dates the PPG. Three distinct options are outlined below.

Option	Description	Overview
A	Retain existing Core Strategy thresholds for on-site requirements and for financial contributions in Rural Areas	This option is part of the extant development plan and has been through examination post-NPPF. Also, it maximises affordable housing provision. However, the Core Strategy pre-dates the PPG and does not align with it. Also, financial contributions have not been sought to date for very small schemes in rural areas.
B	Amend existing thresholds to be in line with the PPG (i.e. not seek any on-site provision for affordable housing from sites of 10 or less) and also not seek financial contributions on smaller schemes in the AONB from schemes of 6-10 dwellings	This would be consistent with the PPG in that the financial contributions element is discretionary and needs local justification. However, it would reduce the number of affordable homes coming forward in rural areas, with no on-site contribution from schemes of 6-10 dwellings (or 5-10 under the Core Strategy) or financial contributions from smaller schemes.
C	Amend existing thresholds to be in line with the PPG and also seek financial contributions from schemes of 6-10 dwellings in the AONB	This would be consistent with the PPG and would draw on the fact that the case for affordable housing from schemes of 5 and above has been accepted through the Core Strategy. It would yield less affordable homes than Option A but more than Option B, the main differences being the lack of contributions from schemes of 1-5 dwellings. Also, opportunities to use financial contributions to increase supply are less certain than on-site provision.

- 8.9. Views are sought on these options – as reflected by the question below.
- 8.10. In the interim, the Council's position is that Option C will be followed. An exception to this is that financial contributions will not be sought from sites of 6-10 dwellings in Battle pending further viability assessment, as the Core Strategy does not require any provision, either on-site or financial contributions, from sites of less than 10 dwellings at present.
- 8.11. At this point, if the Council were to insist on Core Strategy thresholds, there would be a high risk of successful appeals; also, it is recognised that most very small schemes are likely to be exempt from providing affordable housing, as 'custom or self-build' homes in any event, as well as the need to support the delivery of small sites as an important contributor to overall housing supply.
- 8.12. As the PPG thresholds are higher than those in the Core Strategy and the contributions required will be less or the same as would have been required under Policy LHN2, then this interim position cannot have any prejudicial effect on the viability of developments and, in some cases, will increase it.
- 8.13. At the same time, the Council will further consider the merits of the different approaches before the final version of the plan is finalised, which will take into account comments made on the above options and further work on viability of a number of proposed policy requirements aside from affordable housing, such as residential space and access standards, water efficiency standards and provisions to support biodiversity.
- 8.14. Separate guidelines to advise developers on the financial contributions that will be sought, with immediate effect, from housing schemes of 6-10 net additional dwellings within the High Weald AONB, outside of Battle town, are published alongside this Options and Preferred Options Plan.

QUESTION 8: Which option for the supply of affordable housing is most appropriate to ensure a sufficient supply of affordable homes without prejudicing the viability or deliverability of development?

Access to housing and housing standards

- 8.15. It is vital that new homes meet the needs of their occupiers, and future occupiers, in terms of the both the internal and external space available. Also, having regard to the generally ageing population, it is important to build homes that are capable of meeting the needs of people who are less mobile or who may become less mobile.
- 8.16. This Section is made of three complementary parts to help ensure widespread access to housing, covering (a) internal space standards, (b) accessible and adaptable housing and (c) housing for older people.
- 8.17. National policy expects councils to plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as families with children, older people, people with disabilities, and people wishing to build their own homes), including through the delivery affordable housing. (NPPF, paragraph 50).
- 8.18. In March 2015, the Government set out in a Written Ministerial Statement¹ its new national planning policy on the setting of technical standards for new dwellings. These provide for 'optional' standards above the basic minimum set out in the Building Regulations 2010 to be applied in relation to water efficiency and access, and gives local councils the ability to "opt in", through their local plan, to these, as well as to a nationally described internal space standard for residential dwellings. Planning Practice Guidance (PPG) adds that the introduction of the 'Optional Technical Standards' requires the gathering of evidence to determine whether there is a local basis for setting them, as well as consideration of how the of setting of optional standards affects viability and delivery of development.
- 8.19. The Council's adopted Core Strategy looks for a housing mix to meet the needs of all households (through Policy LHN1), while Policy CO5 promotes initiatives and developments which enable older people to live independently in their own home, as well as increase the range of available housing options with care and support services in accessible locations.

Internal Space Standards

- 8.20. The Government's internal space standards² sets out requirements for the Gross Internal (floor) Area of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key parts of the home, notably bedrooms, storage and floor to ceiling height. Figure 2 below shows the minimum gross internal floor areas and storage.

1 [Steps the government are taking to streamline the planning system, protect the environment, support economic growth and assist locally-led decision-making.](#)

2 [The Governments internal space standards](#)

Figure 2. Minimum gross internal floor areas and storage (sqm)

No. of Bedrooms (b)*	No. of Bed Spaces (p)	1 Storey Dwelling (sqm)	2 Storey Dwelling (sqm)	3 Storey Dwelling (sqm)	Built-in Storage (sqm)
1	1	39			1
	2	50	58		1.5
2	3	61	70		
	4	70	79		2
3	4	74	84	90	2.5
	5	86	93	99	
	6	95	102	108	
4	5	90	97	103	3
	6	99	106	112	
	7	108	115	121	
	8	117	124	130	
5	6	103	110	116	3.5
	7	112	119	125	
	8	121	128	134	
6	7	116	123	129	4
	8	125	132	138	

- 8.21. The PPG is explicit that space standards should be justified, taking account of need, viability and timing. An 'Access to Housing and Housing Standards' Background Paper has been prepared that reviews the requirements (together those for accessible and adaptable homes – see next sub-section) and gather evidence in terms of current building sizes and costs.
- 8.22. Analysis of recently built and approved schemes existing of varying sizes, in terms of their gross internal floor area, bedroom floor areas, bedroom widths, built-in storage and ceiling heights, suggests that some 44% of dwellings would not meet the minimum requirements for the gross internal area (GIA), being on average 9sqm too small, more so in larger schemes and for private housing.
- 8.23. However, these figures do not fully explain the results of the research. Although a relatively small amount complied wholly, the majority of schemes have potential to meet the standards with minor adjustments to the internal layout to improve bedroom sizes and built-in storage. For example, if smaller second bedrooms identified as double rooms were denoted as single rooms, this would reduce the minimum requirement for the GIA, as it would have fewer bed spaces. Essentially, second bedrooms may be either enlarged to better function as such or be more reasonably identified as single rooms.

- 8.24. Overall, the research indicates although the figures show there is a low compliance, every one of the measurements are close to the standards and would not have required major adjustments to become compliant with the space standards.
- 8.25. In terms of viability, the Government's own impact assessment details the likely cost impacts to development in adopting the optional standards. These are relatively low and, also considering the consequential impact on sale values, should not detract from the overall viability of developments. This will be further tested prior to the submission version of the Plan alongside other planning-related costs.
- 8.26. It should be stressed that these are minimum standards and that greater floor areas are not discouraged. In fact, greater areas may well be appropriate to support home working.

Space Standards policy options:

Option A: New policy that seeks to adopt the nationally described space standards District-wide.

Option B: No policy relating to the adoption of the nationally described space standards .

The evidence has highlighted the need to adopt the Government's nationally-described space standards through local planning policy (Option A). This will ensure that homes coming forward in the future, constructed to these standards, will ensure adequate internal space for residents to live comfortably, supporting the Council's Core Strategy Vision and Objectives. Option B would see residential developments continue to be built without minimum internal space standards. Whilst a number of developments have been built in recent years which meet or exceed these new standards, a proportion did not. This trend may continue or increase in the future, placing further pressure on living space. However, it is not seen as financially necessary, as it need not impact materially on development viability, or the affordability of homes. The length of the plan-making process gives sufficient lead in for developers to prepare for it becoming effective through the Building Regulations. In the meantime, regard is given to the standard when allocating housing sites. The SA/SEA highlights the advantages of the standard in terms of contributing to housing objectives. Hence, Option A is the preferred policy approach. The proposed policy wording is set out below.

Policy DHG1: Residential Internal Space Standards

The Council adopts the Government's nationally-described space standard.

All new dwellings (including converted flats) should provide adequate minimum internal space in line with the standard.

Access Standards

- 8.27. The Government has introduced, through amendments to the Building Act 1984³, a three tier standard for accessibility in Part M (access to and use of buildings) of Schedule 1 of the Building Regulations, involving a mandatory baseline (i.e. minimum) requirement and two optional standards:
- Mandatory baseline - M4(1) – visitable dwellings
 - Optional Standard - M4(2) – accessible and adaptable dwellings
 - Optional Standard - M4(3) – wheelchair user dwellings

Figure 3. Main differences between Part M 'Building Regulations' M4(2) and M4(3).

M4(2) Accessible and adaptable dwellings	M4(3) Wheelchair adaptable dwellings
<p>In addition to all the baseline requirements – M4(1), dwellings built to M4(2) must comply with the following:</p> <ul style="list-style-type: none"> • All occupants must be able to approach bin stores. • Drainage for all paved areas must be installed with suitable falls to ensure there is no standing water. • Access to upper floor flats should be available by lift. • Dwellings should have provision for a future stair lift. • Principal living areas are to have low level windows no more than 850mm from floor level. • Bedrooms must have minimum direct route to the window at least 750mm wide. • Walls must be adapted to allow for future grab rails in bathrooms/stairwells. • Drainage must be provided for future level access shower room on the ground floor. • Ground floor level window handle locks must be between 850mm-1200mm. 	<p>In addition to all the M4(2) requirements – M4(3), dwellings must also comply with the following:</p> <ul style="list-style-type: none"> • Scooter/wheelchair storage must be provided. • Where there is a rise across the development over 300mm a stepped approach must be also be provided along with a ramp. Ramps must have a gradient of no more than 1:15. • Communal entrances – power assisted doors should be provided in certain circumstances. (Provisions for the future powered doors must be installed to private principal entrances). • Bedrooms must have minimum direct route to the window at least 1,000mm wide. • Provisions for through floor lift must be provided. • Stairs are to be installed in accordance with the guidance followed for ambulant person's stairs. • Living spaces including bedrooms have a minimum size, plus there is detailed guidance for kitchen worktop length and location of fittings (these vary depending on the number of persons per dwelling). • All bedroom ceilings must be capable of taking a load of 200kg for a possible future hoist. • Door entry systems required at principal entrance with answering systems in the main bedroom and in the lounge.

3 Through the Deregulation Act 2015

Housing

Access to housing and housing standards

- 8.28. Part M4(3) of the Building Regulations distinguishes between (3a) wheelchair accessible (a home readily useable by a wheelchair user, including step-free access) and (3b) wheelchair adaptable (a home that can be easily adapted to meet the needs of a household including wheelchair users) dwellings. Local Plan policies for wheelchair accessible homes (M4(3)(a)) should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.
- 8.29. Having regard to PPG advice about relevant data and factors, available evidence suggests that the introduction of the optional accessibility standard M4(2) could be justified within the District due to its ageing population and forecasted increase in the number of people with mobility issues and limiting illnesses. For comparison, it is noted that similar provision was made by Housing Associations under former 'lifetime homes' standards.
- 8.30. Consideration is also given as to whether it would be appropriate to apply this requirement to all new housing or a certain proportion. It may be seen as "future-proofing", but is difficult to justify this across the board based on forecast needs and the potential negative impact on overall delivery of unit numbers. However, given the proportion of the district's population projected to have mobility issues or limiting illnesses and older people/households (over 25% of the population by 2030) and that, by 2032, 29% of all households will have a household representative aged 75 or over (with almost 15,000 over 75s living alone by 2030), this suggests that a requirement of at least 25% of new homes to meet the optional Building Regulation for accessible and adaptable homes would be appropriate.
- 8.31. In terms of viability, the Government's Impact Assessment estimated that the typical additional cost to a three bedroom house in adopting the M4(2) access standard would be £521. In terms of the cost impact in constructing a three bedroom dwelling to the M4(3a) – wheelchair accessible, would be £22,791. It also indicates that there will be cost savings over time as more dwellings get built to these accessibility standards.

Access Standards policy options:

Option A: Apply universal new policy that requires all residential development across the District to be built to the enhanced access standard M4(2).

Option B: Apply new policy requiring 25% of residential development on sites of 11+ dwellings to be constructed to the enhanced access standard M4(2).

Option C: Apply new policy requiring 25% of residential development on sites of 11+ dwellings to be constructed to the enhanced access standard M4(2), with an additional 5% being built to M4(3)(a) on sites of 50+ dwellings.

Option D: No policy relating to enhanced access standards i.e. All development to be built to M4(1) standard (baseline).

Option A is a comprehensive approach and would yield most opportunities for households wishing to move to dwellings which can be relatively easily adapted in the future, should a household's circumstances change. However, the need for this is not clear, especially having regard to the potential for “lower level” adaptations in standard homes. There is likely to be some impact on the viability of some schemes from meeting this requirement universally.

Option B, to apply policy requiring 25% of dwellings to be constructed to the enhanced access standards – M4(2) only to larger schemes of 11+ dwellings reflects the available evidence on potential need; hence, will provide opportunities for people wishing to access residential dwellings which have enhanced accessibility as well as adaptability for the future. The lesser cost implications than Option 1 and its restriction (as a minimum) to larger schemes, coupled with better fit with potential demand, mean lower viability implications.

Option C, to apply the M4(2) Standard to sites of 11+ dwellings at a requirement of 25%, with a further 5% of dwellings to M4(3)(a) standard, seeks to also meet the needs of the population who have, or will have, a life limiting illness by providing a small proportion of new dwellings that are readily adaptable for wheelchair users. The proportion reflects available evidence on incapacity. Affordable housing elements of schemes may play a significant role in meeting such a requirement. There is an impact on viability, but notably less than be providing fully accessible wheelchair homes, which may still be provided where nomination rights exist, where there is demand and would be accepted as contributing to the requirement.

Option D, would see residential developments continue to be built without policy relating to enhanced access standards, with the Council seeking to negotiate on a site by site basis, should a need be identified within a particular area. There would inevitably be less provision for meeting the requirements in both land acquisition and initial design work however, making it more difficult to achieve higher standards should a need be identified.

Option C is the tentatively preferred policy approach, although this is qualified by a need for wider inputs in relation to need and effectiveness.

The proposed policy wording is set out below.

Policy DHG2: Accessible and Adaptable Homes

The Council adopts the Optional Buildings Regulations for Accessible and Adaptable Homes.

Sites of 11 or more dwellings are required to provide at least 25% of dwellings to meet M4(2): Category 2 – Accessible and Adaptable Dwellings.

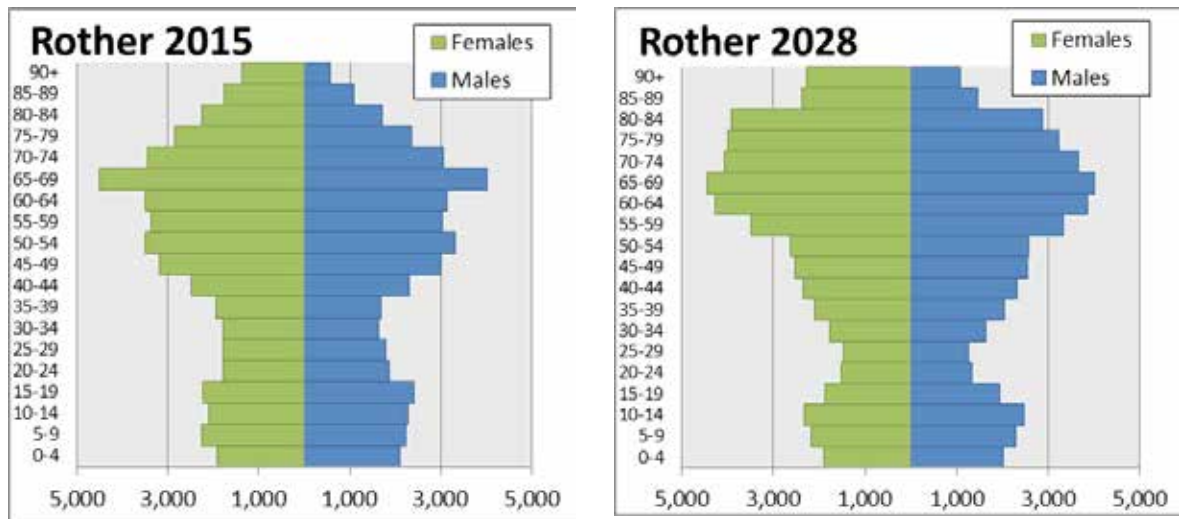
Sites of 50 or more dwellings are also required to provide a further 5% to meet M4(3)(a): Category 3 - Wheelchair Adaptable Dwellings.

Only in circumstances where it can be robustly demonstrated by the applicant that it is not practicable or financially viable to deliver the provisions above, new development will be exempt from either or both of these policy requirements.

Specialist housing for older people

- 8.32. Population estimates show that 22% of the population of Rother are currently over 65 years old, with 32.4% of the population in Bexhill over 65 at the last Census. In 2027, households whose head is over 65 years old will equate to almost 50% of all households within Rother, up from 45% in 2014. This equates to an extra 4,229 over 65s in 2027, while it is also forecast that the number of households where the representative is 75+ will increase by more than a third over this period and that there will be a significant increase in the number of over 75s living alone by 2030, by almost 50%.
- 8.33. These proportions, coupled with large forecast increases in the number of people with limited mobility and limiting long term illnesses, will inevitably lead to an increase in the need for suitable housing that can be adapted to allow people to stay in their own homes for longer – as covered in the preceding sub-section – but also a need for more supported, care housing.

- 8.34. There is already a range of housing options in the District, including sheltered, supported and extra care housing, in addition to residential and nursing care homes. However, this provision will need supplementing to meet the increasing level of demand, as the “bulge” of 45-74 baby-boomers in 2015, moves through age cohorts.



- 8.35. Evidence from East Sussex County Council (ESCC) is that between 2010/11 and 2014/15 the numbers of people receiving 10-15 hours' support increased by 43% to 425 and those receiving over 15 hours' support per week have increased by 73% to 291. Bexhill has significantly more older people in receipt of high levels of care than anywhere else in the district. Other areas with noticeable demand are: Rye (56% increase from 2010-11 to 2014-15), Battle (57% increase), Ewhurst (143% increase) and Northiam (109% increase).
- 8.36. Currently there is not a wide choice of options in all parts of the District, although Bexhill has several retirement housing schemes and a new extra care housing scheme in Sidley. There is also a good supply of residential care homes, followed by Battle. In fact, residential care placements have remained broadly unchanged over the last five years and nursing home placements have slightly fluctuated (peaking at its highest during 2014/15).
- 8.37. Further evidence on the range of housing needed over the plan period to meet the needs of people who are unable, or prefer not to continue to live at home for either health or other quality of life reasons, is required. This will be developed in conjunction with the relevant agencies and in consultation with service providers as this Plan progresses.
- 8.38. In particular, views are sought on the following tentative options, which should be seen as complementary to the existing Core Strategy policy requiring 30% 1 and 2-bed homes in rural areas and to the above proposed policy on accessible and adaptable housing.

Housing for Older People policy options:

- Option A:** Require schemes over a certain size, perhaps 100 dwellings, to provide an element of residential development specifically designed for older people.
- Option B:** Set district-wide targets for numbers for different types of care home places (i.e. sheltered, supported and extra care housing, residential care and nursing care homes) and, if so, what should these be?
- Option C:** Promote extra care housing schemes in rural service centres.
- Option D:** Seek a proportion of affordable housing to be housing targeted at older people, including bungalows.
- Option E:** Seek a proportion of market housing to be housing targeted at older people, including bungalows.
- Option F:** Promote development of a 'care hotel' to assist transition from hospital care back to independent living.

QUESTION 9: Do you agree with the policy approaches to:

- (a) adoption of the national internal space standard?**
 - (b) adoption of the optional Building Regulations standards for accessible and adaptable housing?**
 - (c) housing for older persons, and the specific policy options highlighted?**
- If not, what changes would you wish to see?**

Self-build and custom housebuilding

- 8.39. 'Self-build' is where an individual, or a group of individuals, purchases a plot of land and design and build a house to live in. They do most or all of the build themselves. 'Custom-build' is where an individual, or a group of individuals, purchases a plot or plots of land and employs/commissions a builder, architect and, in some cases, a project manager to oversee the build.
- 8.40. Councils are required to plan for all types of housing, while the Self-build and Custom Housebuilding Act 2015¹ places a duty on local councils in England to keep and have regard to a register of people who are interested in self-build or custom build projects in their area.
- 8.41. The Council's Register² was set up in April 2016, as required by the Regulations. This will be the primary source of data about the demand for plots for self-build and custom housebuilding and will inform the policy approach for the number, location, size and type of self-build and custom-build plots to be planned for across the District. At this point though, it is difficult to determine what level of demand will be generated for self-build and custom housebuilding, as data has only been collected over a relatively short time period.
- 8.42. Interest shown to date, as at 1st September 2016, amounts to a total of 43 individuals on Rother's self-build and custom housebuilding Register, with 26 individuals indicating a preference in self-build and 17 individuals indicating a preference in custom-build. Figure 4 below shows a breakdown of the type of interest that the Council has received in terms of type of plot and property required, local connection and location preference for both self-build and custom housebuilding.

Figure 4. Breakdown of data from Rother self and custom-build register

Type of Plot required		Type of Property		Local Connection		Location Preference	
Individual Plot	26	Detached	24	Work in Rother	5	Bexhill	4
Individual plot with group of other self/custom builders	1	Specialist housing	2	Live in Rother	24	Hastings Fringes	2
No explicit preference	16	No preference	17	No local connection	14	Battle	0
						Rural east	1
						Rural west	5
						No explicit preference	31

¹ <http://www.legislation.gov.uk/ukpga/2015/17/contents>

² <http://www.rother.gov.uk/selfbuildregister>

- 8.43. In the context of the overall housing target of at least 5,700 homes over the plan period, at present this demand, as identified through the Register, is seen as very small (i.e. less than 1% of the overall housing target). It is difficult to determine whether the initial 'rush' of applicants to the Register in the first few months will continue at a similar rate in the future or will not increase much further. This will be kept under review as this Plan progresses, but views are sought on the likely level of need is for self-build and custom housebuilding.

QUESTION 10: Is it appropriate to plan for about 1% of the total housing target for the District (i.e. 55-60 new dwellings) as self-build and custom housebuilding or, if not, what would be the appropriate proportion?

- 8.44. Once an overall target for new self and custom-build housing has been identified, consideration needs to be made in respect of how this housing should be delivered. The Council presents the following potential options.

Self-build and custom housebuilding policy options:

Option A: New policy that seeks to generally encourage self and custom build housing on residential sites.

Option B: New policy that seeks to require a proportion of self and custom build housing in strategic allocations within the District.

Option C: New policy that seeks to require a proportion of self and custom build housing in large residential sites (50+).

Option D: New policy that allocates specific sites for self and custom build housing in within the District.

The above options are possible ways in which the Council can meet the demand for self-build and custom housebuilding. They are not mutually exclusive; that is, options A, B, C and D may all be followed if circumstances warranted it.

Options B and C have been selected as large scale schemes are most likely to have scope to incorporate self and custom-build plots without adversely affecting viability. At present, it appears that the inclusion of relatively small amounts of land for self-build and custom-build homes on such sites would be readily sufficient to meet the overall quantum of demand. However, this approach may not meet demand in the rural areas, where sites are generally smaller, although it is noted that single plots are often built to a customer's specific design and hence can be viewed as contributing to the demand for 'custom-build'.

The current evidence shows a roughly 60:40 split between self-build and custom housebuilding respectively; it does not point to a particular pattern of preference in terms of plot location within the District, although does skew toward a need for detached dwellings.

QUESTION 11: Which policy approach(es) from those listed above do you consider to be most appropriate for providing sufficient, appropriate plots to support the self and custom-build sector in Rother, or is there an alternative?

External residential areas

- 8.45. In planning new residential developments, it is important to appreciate that schemes will provide the living environment for people for decades to come. Therefore, all new residential development should be capable of accommodating the reasonable expectations of likely occupiers, in accordance with Local Plan Core Strategy Policy OSS4. This applies to the external areas, which should provide not only sufficient outdoor amenity space but also cater for practical needs, such as parking and refuse/recycling facilities.
- 8.46. The provision, layout and treatment of external areas should be seen as an integral part of the wider design approach to residential developments, which respects the character of its setting, whether urban or rural, and makes a positive contribution to reinforcing local distinctiveness. Key design principles are set out in Policy EN3 and Appendix 4 of the Local Plan Core Strategy.
- 8.47. Gardens should be of an appropriate size to provide sufficient, useable amenity space. For family dwellings, this will normally mean a minimum rear garden depth of 10 metres. Garden space for apartment complexes may benefit from individual design solutions to the provision of external amenity space, such as providing courtyards or communal spaces of appropriate and usable size.
- 8.48. In practice, a number of considerations may affect garden size, including the relationship with adjacent properties and land uses. Where the usability of external space is constrained, such as by sloping ground, orientation or the presence of large trees, or where there is a strong, well-established spacious character, larger gardens will be more appropriate. Overlooking of and from neighbouring properties must also be considered.
- 8.49. East Sussex County Council's 'Guidance for Parking at New Residential Development' and 'Guidance for Parking at Non Residential Development' has been adopted for use by the Council in the assessment of parking provision in new development proposals. It is expected that parking provision accords with prevailing adopted standards. Moreover, it should be wholly integrated into the layout and design of the proposed scheme and respect and be informed by the character of the locality. Developments should not be dominated by hardstandings or verge parking. The visual impact of parking on the character of the locality and on residential amenities may be mitigated by appropriate use of soft landscaping.
- 8.50. Refuse and recycling storage and collection facilities should be considered at the beginning of the design process in new development to ensure that:
- Adequate refuse and recycling facilities are provided to serve the development.
 - Storage of wheelie bins, communal waste bins and refuse sacks do not detract from the street-scene, obstruct access or detract from residential amenity.
 - There is convenient access, both for occupiers of the properties and for the collection vehicles and workers.

- 8.51. Useful operational guidance has been produced on behalf the East Sussex Waste Management Partnership and should be referred to. It is available to view or download at: <http://www.rother.gov.uk/article/4961/Overview-of-the-service>

Policy options:

Option A: No further policy but rely on general principles implied in Core Strategy Policy OSS2 and referred to in its supporting text.

Option B: New general policy that brings together/highlights need to consider amenity space, parking and refuse/recycling.

Option C: New detailed policy that sets standards for amenity space, parking and refuse/recycling.

The SA/SEA of these options shows that the development of a more detailed policy (Option C) that elaborates upon existing policies would offer more certainty in terms of amenity benefits, so long as it is not unnecessarily onerous. Both a reliance on existing policies (Option A) and a more general policy (Option B) leave greater uncertainties, particularly the former, as they are more open to interpretation.

The significance of garden space, parking space and room for refuse/recycling bins to residential amenity is considered to warrant policy coverage. Option A is not regarded as giving sufficient attention to what are important practical layout issues. Option B does provide a focus, but given that there is a tendency for houses to be “squeezed” on small plots to the detriment of useable external garden areas, a guideline for minimum garden lengths for family dwellings is considered appropriate. This can also assist in addressing “town cramming” and overlooking issues.

Hence, **a combination of Option B and Option C is the preferred policy approach.** The proposed policy wording is set out below.

Policy DHG3: External Residential Areas

An integrated approach to the provision, layout and treatment of external areas of dwellings should be taken in accordance with relevant Core Strategy policies and with specific regard to the following:

- (i) **Private External Space.** Appropriate and proportionate levels of private usable external space will be expected. For dwellings with three or more bedrooms, private rear garden spaces of at least 10 metres in length will normally be expected. In relation to flat developments and complexes, an appropriate level of usable communal amenity space should be provided.
- (ii) **Car Parking.** Car parking provision should be made in accordance with Core Strategy Policy TR4 and should be appropriate to the location, layout and design approach of the development.
- (iii) **Waste and Recycling.** Sufficient bin storage and collection points must be provided on all new residential developments and changes of use. Their siting and design should be considered at the outset, be integral to the development, respect the visual amenities and streetscape character of the dwelling and the area, and be fully accessible for collection vehicles/ operatives as well as occupants.

QUESTION 12: Do you agree with the proposed policy approach to external residential areas and the proposed policy wording? If not, what changes would you wish to see?

Extensions to residential gardens

- 8.52. Some householders and other property owners, particularly in countryside locations, seek to enlarge the extent of land in residential use surrounding their dwelling either to accommodate outbuildings, parking or for use as garden.
- 8.53. While such extensions can be acceptable, a prime objective in rural areas is to conserve the intrinsic value and locally distinctive character of the countryside. In the High Weald Area of Outstanding Natural Beauty, great weight will be given to the conservation of its landscape and scenic beauty. The erosion of countryside character, albeit incremental, and the potential suburbanising effect caused by the enlargement of garden areas should be avoided.
- 8.54. Hence, any extensions to gardens should be modest in scale (such as to provide sufficient outside area for the reasonable enjoyment of the dwelling or to accommodate essential services) and create a logical new boundary to a natural feature such as a hedgerow, watercourse or woodland or otherwise constitute a “rounding off”, which is acceptable in its impact on the rural character of the area.
- 8.55. Where a garden extension is acceptable, conditions will normally be attached to mitigate the visual impacts including, soft landscaping and where the dwelling’s curtilage is extended, removal of permitted development rights for the erection of outbuildings and provision of hard surfaces.

Policy options:

Proposals to extend residential garden boundaries are quite regular and need careful consideration, especially in rural areas where they can erode landscape character and tend to “suburbanise” the countryside. A policy currently exists in the form of ‘saved’ 2006 RDL Policy HG9, but will be superseded when this new Plan is adopted. Continued policy coverage is helpful to guide residents and other interested parties on acceptability in line with the general development strategy and basic principles of the Core Strategy, notably in policies RA3, EN3, OSS4 and EN1. However, this is an opportunity to review its appropriateness.

Two options have been considered and subject to Sustainability Appraisal:

Option A: Retain existing Local Plan Policy HG9.

Option B: A clear restriction on garden extensions into the countryside.

The continuing effectiveness of the existing policy points to its retention. Also, although a highly restrictive policy would prevent erosion of rural character, the proper application of the landscape character criterion in the existing policy, coupled with the clear statement about limiting any such extensions, will ensure that amenity objectives may be met as far as consistent with the environmental objectives. Therefore, **Option A is preferred**. The proposed policy wording is set out below. (NB A change in terminology is made to refer to “gardens” rather than “curtilages”, as this better reflects the definition of the ‘planning unit’, as well as being better understood.

Policy DHG4: Extensions to Residential Gardens

Extensions to the gardens of existing dwellings in the countryside will not be permitted unless the extension:

- (i) is modest in area and the change of use and associated domestic paraphernalia does not harm the rural character of the area; and**
- (ii) is to a natural boundary or is a logical rounding off.**

QUESTION 13: Do you agree with the proposed policy approach to extensions to residential gardens and the proposed policy wording? If not, what changes would you wish to see?

Extensions, annexes, alterations and outbuildings

- 8.56. Extensions and alterations to dwellings, including annexes and outbuildings, are often means of enabling people to better meet their housing needs without moving.
- 8.57. Smaller proposals often don't need planning permission (although generally require approval under the Building Regulations), but more significant proposals generally do require permission and will be considered in terms of:
- impact on the amenities of neighbouring properties;
 - relationship with the character and appearance of the principal building; and
 - compatibility with the general character of the locality.
- 8.58. The overall approach to these considerations is set out in the Local Plan Core Strategy, notably Policy OSS4, which requires all development to not unreasonably harm the amenities of adjoining properties and respect the character and appearance of the locality, and Policy EN3 (supplemented by Appendix 4), which requires high quality design.
- 8.59. Extensions, alterations or new outbuildings can, through their height, size and location, impact on adjoining properties in terms of:
- a loss of sunlight or daylight through overshadowing of habitable rooms or gardens;
 - having an overbearing presence through their size and position (generally referred to as its "massing"); and
 - result in overlooking or loss of privacy.
- 8.60. In considering these factors, regard should be given to whether there is a significant change in level between properties, as this may increase the impact of an extension on the amenity of neighbours' homes.
- 8.61. In assessing proposals, the Council uses the Building Research Establishment's principles in 'Site Planning for Daylight and Sunlight: A Guide to Good Practice'.
- 8.62. In relation to whether there is an overbearing massing, this tends to arise most commonly where two-storey rear extensions are proposed, particularly on narrow-width terraced properties or closely-sited semi-detached properties.
- 8.63. Overlooking is most commonly an issue where windows to habitable rooms would directly face those in a neighbouring property, particularly when considering first floor side extensions, and should be avoided. In exceptional cases, obscured glazing may be considered where potential overlooking problems cannot be overcome, or window(s) should be set at an angle to avoid direct overlooking.
- 8.64. To ensure that an extension or other building relates appropriately to the principal dwelling and its locality, the design approach should draw on an analysis of local character and distinctiveness undertaken in line with Core Strategy Policy EN4.

Housing

Extensions, annexes, alterations and outbuildings

- 8.65. Also, in order to demonstrate that a proposal will contribute positively to the character of the site and the surroundings and that due regard is given to how it will relate to both the dwelling and neighbouring development, drawings (elevations and sections) should show proposals in the context of adjacent buildings.
- 8.66. Either traditional or contemporary design approaches can be appropriate in a particular context; their success dependent on how well they are thought out and detailed. Traditional designs will be expected to follow the distinctive vernacular characteristics of the host building - for example, simple building forms with relatively narrow roof spans, matching storey heights, a materials palette of brick, clay tile (including handmade clay tile in historic areas), timber weatherboarding, steeply pitched roofs, open eaves, small module windows, and traditional joinery styles. Meanwhile contemporary designs will be expected to demonstrate design flair, a skilled handling of materials and crisp detailing.
- 8.67. In all cases, even where the existing building is architecturally unremarkable, proposals should demonstrate basic design principles of scale, form, massing, height and proportion in relation to the existing dwelling and the wider area.
- 8.68. A good general principle is to ensure that extensions, especially side extensions, do not dominate the existing dwelling but, rather, are “visually subservient”, such that they do not detract from the property’s architectural integrity or the character of the street or lane. This can often be achieved by a combination of an appropriate elevational width and scale in relation to the existing dwelling, the setting back of the extension from the front wall of the house, and stepping down of the roof ridge height. Particular care needs to be taken if an extension is proposed to only one side of a property to ensure that a visually balanced front elevation is created. Side extensions should normally seek to maintain external access to rear gardens.
- 8.69. Retaining sufficient external private space to meet the continuing requirements of the dwelling is an important consideration in proposals for extensions and outbuildings, including the retention of usable and meaningful amenity/garden space and sufficient space for off-street parking and refuse/recycling facilities. This is covered specifically by Policy DHG3.
- 8.70. Detailing and materials can be critical to a successful extension or other ancillary building. Every effort should be made to retain and, where appropriate, repeat any distinctive architectural features and materials that contribute positively to the character of the building.
- 8.71. In relation to side extensions, particular care should be taken to avoid infilling the gaps between detached or semi-detached houses where these are an important characteristic of the locality, creating a visual rhythm and density to the street, as it may result in a cramped, ‘terracing effect’ and detract from the character of the dwelling and the street scene.

- 8.72. Alterations to roofs to create attic-level accommodation require careful design. Some roofs may not be suitable for conversion if their pitch is too shallow and sufficient headroom cannot not be achieved without protruding above the ridge line.
- 8.73. Successful dormer windows are achieved where they are appropriately located within the slope of the roof (and not on the hipped part of a roof) and have due regard to the arrangement and proportions of existing windows. This normally means aligning them over, or set slightly in from windows in the elevations below, and being smaller sized than those below. Overly large or box-like dormers are inappropriate for the majority of domestic properties, as they give the house a top-heavy appearance. Too many dormer windows in a roof slope may also be harmful.
- 8.74. For historic and other vernacular buildings, and in historic areas, the design and details of extensions and alterations will be carefully scrutinised to ensure that they are consistent with the specific architectural character and form of the existing dwelling and the character and appearance of the area. Converted traditional farm buildings, including barns and oasthouses, are particularly vulnerable to inappropriate extensions, garages, sheds and other outbuildings that undermine the intrinsic character of the building as an example of a particular building typology or would domesticate and detract from the character of the countryside setting.
- 8.75. Modest single storey outbuildings which are ancillary to the main dwelling and reflect its character and materials can contribute to the character of a locality. The siting of outbuildings, including garages, needs careful consideration in terms of both the relationship with the main house - particularly if it is of heritage value – and the wider street-scene – avoiding cramping or cluttering the site or adversely affecting the amenities of neighbouring properties. Discreet siting is generally preferred, as siting buildings in front of the main house often dominates the plot frontage, detracting from the appearance of the dwelling in the street scene. In rural areas, especially within the High Weald AONB, it is important that outbuildings conserve landscape character and qualities and do not ‘suburbanise’ this sensitive countryside.

Policy options:

Option A: Retain Policy HG8 of the 2006 Local Plan.

Option B: A more detailed policy focusing on the practical implications of the need for high design quality and response to local context.

The currently saved Policy HG8 requires extensions, alterations and outbuildings to be in keeping with the existing dwelling, its surroundings and to protect residential amenity. In countryside locations, it protects the landscape, particularly the AONB and seeks to retain the character of converted rural buildings.

Given the volume of applications for such development and the benefits of conveying key principles of good design in this context, Option B aims to provide a more practical “checklist”-type approach, but without being overly prescriptive or detailed.

The SA/SEA of these options shows that Option B offers potential advantages in terms of conservation of both the (historic) built and natural environment. This confirms the view that there is scope to improve and expand somewhat on the current policy.

Hence, **Option B is the preferred policy approach**. The proposed policy wording is set out below.

Separate consideration of options for policy coverage of annexes is given subsequently.

Policy DHG5: Extensions, Alterations and Outbuildings

Extensions, alterations and outbuildings to existing dwellings will be permitted where:

- (i) they do not unreasonably harm the amenities of adjoining properties in terms of loss of light, massing or overlooking;**
- (ii) they respect and respond positively to the scale, form, proportions, materials, details and the overall design, character and appearance of the dwelling;**
- (iii) they do not detract from the character and appearance of the wider street-scene, settlement or countryside location, as appropriate, in terms of built density, form and scale;**
- (iv) they leave sufficient usable external private space for the occupiers of the dwelling in accordance with Policy DHG3;**
- (v) where appropriate, they fully respect and are consistent with the character and qualities of historic buildings and areas;**
- (vi) in the case of extensions and alterations, they are physically and visually subservient to the building, including its roof form, taking into account its original form and function and the cumulative impact of extensions; and**
- (vii) in the case of outbuildings, through their siting, scale and massing, design and appearance and materials, they respect and respond positively to the character, appearance and setting of the main dwelling within its plot and the wider street-scene or general locality.**

Annexes

- 8.76. A residential annexe is defined as accommodation ancillary to the main dwelling within the residential curtilage that provides additional semi-independent accommodation for members of the same family, often older family members who may need assistance with health care. There are an increasing number of people who, although capable of living relatively independently, would benefit from living close to relatives or carers on whom they can rely for help and support. While this may sometimes be met through the purchase of a nearby property, in other situations residential annexes provide for the carer or relative to be on hand at short notice to provide care and support, including through shared facilities.
- 8.77. The general principle is to support such accommodation where it is needed in a way that enables it to be most effectively incorporated into the dwelling and site.
- 8.78. Annexes can be provided in the form of an extension to the dwelling, the conversion of an existing outbuilding or in some cases a new detached building. An extension to the dwelling is normally most appropriate, as this better integrates the annexe into the dwelling for use of shared facilities and providing ready access, normally also minimise the impact on neighbours, and provides advantages for the longer-term use of the annexe, reducing pressure for future, inappropriate development.
- 8.79. For this reason, a sequential approach is taken for proposals for annexes by firstly looking at whether the required accommodation can be provided in the form of an extension to the dwelling; if not, then, seeing whether an existing outbuilding within the residential curtilage could be converted; if not, then considering the potential for a new separate annexe building located in close proximity to the existing dwelling. Exceptions to this approach may be where the extension of an existing dwelling would not be appropriate, for example in some cases that relate to listed buildings, non-designated heritage assets or historic agricultural buildings.
- 8.80. In all locations annexe accommodation should respect the character, scale and design of the existing dwelling and not adversely affect the living conditions of occupiers of neighbouring properties, in the same way as set out in the policy for extensions, alterations and outbuildings above. The size of the annexe will need to be demonstrated to be that necessary to meet the intended purpose, normally with one bedroom, and demonstrate that it will be capable of being incorporated into the use of the dwelling in the longer-term.

Policy options:

Option A: No specific residential annexe policy.

Option B: A policy setting out essential criteria regarding amenities.

Option C: A policy with a sequential approach to the building of annexes.

Option A relies on the extensions policy, albeit there are additional issues of the relationship with the main dwelling. Option B would identify these further issues, notably in terms of the relationship with the dwelling regarding amenities, garden area and parking. Option C goes further by taking a sequential approach, firstly looking at annexe accommodation in the form of an extension of the dwelling, then the conversion of an existing outbuilding within the curtilage and located in close proximity to the dwelling, then as a new building, which should also be located in close proximity to the existing dwelling and within the residential curtilage.

Given the importance of Rother's rural environment, predominantly within the AONB, Option C is considered justified, but in a context of aiming to accommodate additional space for family members in a property, where practical. This would address concerns about the potential social objectives not being promoted.

Policy DHG6: Residential Annexes

The creation of residential annexes will be permitted normally in accordance with a sequential approach that considers, in order:

- (i) an extension to the dwelling;**
- (ii) the conversion of an existing outbuilding within the residential curtilage that is located in close proximity to the dwelling; and**
- (iii) a new building that is located within the residential curtilage in close proximity to the existing dwelling and has a demonstrable link to the main dwelling, such as shared access (including both vehicular access and doorways), communal parking and amenity spaces, where appropriate.**

The suitability of proposals will also be considered against the criteria of Policy DHG5 above to ensure that they are appropriate in terms of the existing dwelling, surrounding area and amenities of occupants of nearby properties.

In all cases, the occupation of the annexe shall be managed by planning condition or legal agreement to ensure that the accommodation is tied to the main dwelling, cannot be used as a separate dwelling and cannot be sold separately.

QUESTION 14: Do you agree with the policy approach to extensions, annexes, alterations and outbuildings and the wording of the respective policies? If not, what changes would you wish to see?

Boundary treatments, accesses and drives

- 8.81. Boundary treatments, accesses and drives play a significant role in defining the character and appearance of a locality; they can make a positive contribution to the successful integration of new development and to reinforcing local distinctiveness.
- 8.82. The height of boundary treatments, as well as any gates or gate piers, needs careful consideration. It is normally expected that where a development involves boundary treatments, these should be similar in height to the prevailing height of existing boundaries in the area. Also, where there is a repeated style of boundary treatments, for example low walls, railings or an open plan, boundary-free approach, then the Council will normally expect any development proposal to follow the predominant style in the vicinity and to maintain and strengthen the existing character of the street scene.
- 8.83. In terms of the forms of enclosure, close-boarded fencing provides screening for privacy and has less impact when used to enclose rear gardens not subject to public view, but is not always appropriate.
- 8.84. Open post-and-rail fencing on frontages has the advantage of maintaining the natural and open character, while estate railing can also be an appropriate boundary treatment in certain rural areas. However, the predominant boundary type in the rural areas consists of mature trees, hedges and ditches, which are in keeping with the rural scene and provide a continuity of characteristic landscape.
- 8.85. In contrast, the construction of close boarded fences and walls along road frontages can punctuate and detract from the more natural and open character of rural areas and lanes, particularly in the High Weald AONB. The same may apply in urban areas where hedges predominate.
- 8.86. If solid enclosure is necessary, a fence may be set back from the boundary with sufficient space for planting of a hedge in front, with sufficient room that, when mature, it will sit 'in-line' with any existing adjoining hedging or other boundary line.
- 8.87. Occasionally, there may be a stretch of historic brick or stone walling denoting an historic estate boundary; such boundary treatments should be retained and conserved.
- 8.88. More generally, hedges and trees that define historic field boundaries, especially within the High Weald AONB, are regarded as important components of landscape character, as noted in the Environment Chapter; hence, their retention is normally expected.

- 8.89. To reinforce local character, in specifying any new hedging, where a particular type of hedging or tree species is predominant, new planting should be of the same species. In the AONB and other rural areas, native species of planting, such as a traditional mixed hedge of hawthorn, field maple, beech, and hornbeam is characteristic, sometimes with trees such as oak, cherry or ash. Meanwhile, in suburban, village and town centre areas, the Council would normally seek species such as laurel, hazel, holly, yew, box, hornbeam and beech.

When is Planning Permission required?

Under current legislation, planning permission for new boundary treatments or alterations to existing boundary treatments is required if one or more of the scenarios below is met:

- The boundary treatment to be erected would be over 1.0 metre high and adjoining a highway used by vehicles, or over 2.0 metres high elsewhere.
- The boundary treatment is within the curtilage of a Listed Building.
- The boundary treatment is within a Conservation Area and is to be completely demolished, where it is over 1.0 metre high and next to a highway (including a public footpath or bridleway) or public open space; or over 2.0 metres high elsewhere.
- There is a condition attached to the planning permission for the property which restricts the erection of a boundary treatment, or a landscaping condition which requires the type of hedge or tree planting to be agreed by the Council prior to a development being started.

Planning permission to form a new access, or to improve an existing access, is required if the access would be on to a classified road (A, B or C class). Permission is also likely to be required if the access drive would cross land which is in another use (for example a residential driveway across agricultural land) or if significant alterations in ground levels are required in order to construct the access or if the works also require the laying of hard-standing which is not permitted development.

Irrespective of the need for planning permission, any works to a Public Highway such as altering the verge or pavement or providing a dropped kerb will require a separate Crossover Licence from the County Highway Authority.

The Council will always advise applicants, where they believe planning permission isn't required, to apply for a Lawful Development Certificate for a Proposed Use or Development to ensure that this has been formerly agreed by the Council.

- 8.90. A particular issue can arise where a new access or driveway is sought in order to create a parking area at the front of a property which would result in the loss of boundaries, especially hedges, that contribute positively to the character of the street scene. This will require careful balancing of amenity, character and highway safety considerations. Careful siting is required to minimise the amount of any hedge loss and such loss would be expected to be mitigated by replanting with matching species behind the sight lines of the access.
- 8.91. Where a new access is to be created, care should also be taken in the design and materials choices to match the character of the locality, for example in the width of the access and corner radii (subject to highway safety requirements), surfacing materials, provision or not of any kerbing materials, and treatment of verges, particularly to ensure that the works would not suburbanise the character of the rural areas.

Policy options:

Option A: New policy setting out criteria for both boundary treatments and new accesses and drives.

Option B: No policy, but rely on general policies for landscape conservation, maintaining local character and amenities and highway safety.

Option A offers advantages of both a specific focus on the considerations involved and in terms of greater certainty in ensuring that environmental objectives, especially in terms of rural landscape character, are respected. Hence, this is the preferred policy approach. Although there are overlaps between the criteria, separate policies are favoured, for clarity. Their proposed wording is set out below.

Policy DHG7: Boundary Treatments

Planning permission for new or altered boundary treatments, including fences, walls, gates and gate piers and hedges (where they are part of a wider layout plan) will be supported where:

- (i) it does not involve the loss of existing boundary structures of historic or architectural interest;**
- (ii) the proposed boundary treatment, by virtue of design, height, and materials or species, is consistent with the character of the locality;**
- (iii) in the rural areas, it would not, by virtue of its siting or appearance, adversely impact on the undeveloped character of the countryside, nor, by virtue of its design and appearance, introduce a suburban or urban feature into the rural area; and**
- (iv) it is considered acceptable in terms of highway safety.**

Policy DHG8: Accesses and Drives

Proposals for new drives and accesses will be supported where:

- (i) they are considered acceptable in terms of highway safety;
- (ii) in the rural areas, where they would, by virtue of their location and design and materials, maintain the rural character of the locality; and
- (iii) they involve the relocation of an existing access, if there are highway benefits of relocating the existing access, and the existing access will be stopped up.

QUESTION 15: Do you agree with the policy approaches to boundary treatments and drives and accesses and to the wording of the proposed policies? If not, what changes would you wish to see?

9. Economy

Shopfronts and advertising

- 9.1. Shopfronts¹ and advertisements form an integral part of commercial streets and of town and village centres in the District. They play an important role in helping to create an attractive retail environment and, as such, contribute to economic vitality.
- 9.2. While advertising and signage generally convey important information and are valuable in promoting business activities, they can have a significant impact on the appearance of buildings and areas. Unduly prominent or poorly designed signage can detract from the character of a building, the townscape or village street scene or of the countryside within which it is located. Furthermore, if uncontrolled, it can lead to roadside clutter and distract drivers.
- 9.3. In order to protect the amenities of an area, it is important that all signs and advertisements, whether on a building or freestanding, are carefully designed and of an appropriate scale, detail, materials and colours.
- 9.4. Traditional shopfronts, such as the late Victorian/early Edwardian ones found in the planned shopping streets of Bexhill-on-Sea or those inserted into the medieval buildings of the market towns of Battle and Rye, are important because they provide active frontages and make a positive contribution to the character and appearance of those historic centres. Without careful attention though, it is easy to gradually erode the character of traditional shopfronts and historic street-frontages and to lose or obscure important building features.
- 9.5. It follows that there should be a general presumption that the original fabric and detailing of historic shopfronts, such as stallrisers, cornices and pilasters, windows and decorative tiling, should be retained and restored. More generally, any new shopfront should relate well to the building and to its overall setting in the street scene, in terms of its proportions, design, relationship to upper storeys, fascia height and width, mullion treatment, materials and colour. Most common issues relate to the introduction of unsympathetic deep fascias and internally illuminated signage.
- 9.6. Canopies and blinds may be successfully integrated into a traditional shopfront if carefully detailed and not unduly dominant. However, the use of modern materials such as acrylic sheeting, perspex, aluminium or plastic, is rarely appropriate for traditional shopfronts on historic buildings in a Conservation Area.
- 9.7. There is particular concern around the introduction of solid external roller shutters, which can have a “deadening”, inhospitable effect on the street scene. Where security measures are essential, alternatives such as the use of an internal lattice shutter or laminated glass represent more sensitive approaches.

1 The term “shopfront” is taken to mean the built frontage of a variety of commercial premises, including shops, financial and professional services, restaurants/cafes, drinking establishments and hot food take-aways.

- 9.8. Fascia signs are the most common form of advertisement on a building and should be designed to appear as an integral part of it in terms of their positioning, height, size, design and materials. Similar considerations apply to hanging signs, while modern projecting, usually illuminated box signs, can be particularly cluttering and discordant features on shopfronts and in the street scene.
- 9.9. Where shops or other commercial premises lie within a Conservation Area, it is particularly vital that shopfronts, signage and advertisements are well designed and detailed, and relate to their surroundings. Projecting box signs are very unlikely to be appropriate within Conservation Areas.
- 9.10. The Council has adopted specific guidance for shopfronts and signage within Bexhill-on-Sea Town Centre Conservation Area², in recognition of the special architectural character of the shopping terraces that were constructed within a very short period of time at the end of the 19th century and beginning of the 20th century.
- 9.11. The illumination of all signs and advertisements needs sensitive consideration and be restrained in their quantity and brightness. Within the town centres of Bexhill, Battle and Rye, some night-time illumination of shops and other commercial premises helps to promote a vibrant and safe evening economy. Elsewhere, the illumination of signs on buildings, including hanging signs, is normally only justified where it relates to late-opening premises such as a public house, restaurant, chemist or similar. At the same time, consideration must be given to the amenity of residential properties.
- 9.12. In rural areas, advertisements, especially illuminated signage, need to be strictly controlled, in the interests of maintaining the generally undeveloped landscape character and amenities of the countryside, preventing “clutter”, maintaining highway safety and dark skies. Hence, the general approach is to limit its amount and siting to locations close to the premises.
- 9.13. In view of the sensitivity of the District’s historic town centre retail areas, villages and largely AONB countryside, it is intended that further guidance on signage and advertisements will be produced.

Policy options:

There is only limited direct national guidance on shopfronts and advertising, other than to highlight the twin considerations of amenity and public safety and the role of town centre design. Also, there is no specific Core Strategy or saved Local Plan policy on the subject, reliance being placed on generic policies, including those for Conservation Areas. However, there are frequent applications for such developments. Hence, two options have been considered and subject to Sustainability Appraisal:

Option A: A simple, broad-brush policy setting out the general principle of considering impact on amenity and public safety with reference to the local context of conservation areas and other sensitive areas.

Option B: A more detailed policy which sets out the different types of proposals, as well as issues raised, and provides detailed criteria against which proposals would be judged.

Option B is the favoured option. It is more helpful from a Development Management perspective to provide greater clarity of the interpretation of the general principles. The potential benefits of this, notably in terms of the built and natural environment objectives, are reflected in the SA/SEA.

Policy DEC1: Shopfronts and Advertising

Any proposal for a new shopfront, alteration to existing shopfront (including external blinds) and signage on buildings will be permitted where it relates appropriately to the architectural and historic character and appearance of the building in which the shopfront is located, to its overall setting in the street scene, and impact on public safety, having regard to its proportions, size, design, visual relationship to upper storeys, materials, colour, height and width, and illumination.

Particularly within Conservation Areas, the loss of features or fabric of historic, architectural and/or socio-cultural merit or the installation of external roller shutters will not normally be acceptable.

Free-standing signage and advertisements will be permitted where they have an acceptable impact on amenity, including on the scenic, architectural and historic character of the locality, having regard to the relevant features in paragraph 1 above. They should have a close physical relationship to the premises that they serve, have an acceptable impact on highway safety and, in rural areas, not detract from landscape character nor introduce unnecessary “clutter” into the countryside.

QUESTION 16: Do you agree with the policy approach to shopfronts and advertising and the proposed policy wording?

Holiday Sites

- 9.14. Short stay holiday accommodation provided by chalets or lodges, caravans and camp sites contributes significantly to the local economy. However, its promotion has to be balanced against the protection of the countryside and coastal areas, which are the very assets that makes the District attractive to visitors.
- 9.15. The overarching policy approach in the Core Strategy is to support tourism activities and facilities, giving encouragement to increasing the supply of quality serviced and self-contained accommodation, including through upgrading older facilities, while ensuring compatibility with other policies, especially those that protect landscape character and rural amenities.
- 9.16. Caravan and camping holidays take different forms and leisure patterns change over time. Historically, a significant amount of tourist accommodation in the District has been provided on static sites and especially in caravans. Most sites are situated near the coast and laid out in traditional forms. However, they can impact adversely on the special character of the Rother countryside and particularly on an otherwise undeveloped coastline or the High Weald Area of Outstanding Natural Beauty (AONB). Coastal areas are also most often vulnerable to flood risk. Hence, the provision of any new holiday centres or large static caravan/chalet sites would be most unlikely to be appropriate in the countryside.
- 9.17. Many of the existing larger holiday sites are owned by national holiday companies and it is in the nature of the business for operators to look to upgrade facilities regularly to meet new demands on these sites. The upgrading of sites, for example replacing static caravans with chalet or lodge-style units, can be positive in terms of better meeting customer needs and where the impact on the wider landscape is unaffected. In some circumstances, in order to make the best use of land in upgrading facilities on a site, and where there are benefits to be achieved to the character of the area, a limited expansion of an existing site may be permitted if this represents a sensitive extension of that site.
- 9.18. In recent years, as the nature of caravan and camping holidays in this country has become more diverse, the trend nationally has been to move away from seasonal controls on permanent sites to allow all-year-round use.
- 9.19. It is essential that holiday sites remain available as tourist accommodation and do not develop, or become seen, as low cost homes to be purchased or occupied by persons without a permanent residence elsewhere. As well as the loss to the tourism economy, permanent residential occupation has further impacts, notably in terms of traffic and the demands on local service, including schools.

- 9.20. Hence, established practice is to impose conditions on any new permissions to the effect that any unit is only occupied for holiday purposes and not as any person's sole or main place of residence; also, that the owners/operators of the site should maintain an up-to-date register of the names and main home addresses of all occupiers of the holiday units and make this available to the local planning authority.
- 9.21. Changing leisure patterns bring other demands, often for short stay breaks in low key, high quality, self-catering accommodation. These may be accommodated in the natural countryside environment where the scheme involves limited ancillary facilities and generates minimal traffic.
- 9.22. In addition, accommodation serving other countryside uses, for example existing fishing lakes or equestrian facilities, may also be favourably considered where any new buildings can be incorporated in the landscape and the accommodation is wholly ancillary to and an integral part of the principal leisure use.
- 9.23. There is somewhat more scope for further seasonal touring caravan and camping pitches on temporary small-scale sites provided in the summer months where these can be visually contained within the rural landscape. In recent years new forms of camping – the rise of 'glamping' for example – have become more popular, often taking place on small areas of working farms as part of farm diversification. Again, additional seasonal sites will be limited to holiday use and the occupation period will be restricted to prevent use all year round (ordinarily allowing use between April and October).
- 9.24. In all cases, the protection of local landscapes will be paramount and proposals should not adversely impact on the particular characteristics of the High Weald AONB or other sensitive areas, such as those protected for nature conservation reasons.
- 9.25. Some significant areas of the District are at risk from both coastal and fluvial flooding. For both permanent and seasonal tourist accommodation, the provision of new sites or the extension of existing seasonal occupancy periods is unlikely to be agreed in undefended areas of high flood risk unless a Flood Risk Assessment has satisfactorily demonstrated that the appropriate minimum standard of flood defence will be provided and it would not impede flood flows or otherwise prejudice floodplain storage. Fluvial flooding from rivers can occur at any time of the year and therefore highly vulnerable uses such as touring and static caravans, tents should ideally be located outside the floodplain or be adequately defended, with any residual flood risk mitigated for on the site. Flood Risk Assessments will also be required for applications in defended areas to assess any residual flood risk to the site. These should include regard to the impact of hardstandings and other impermeable surface treatments. Restrictions on occupation will be imposed where there is a high risk of flooding.
- 9.26. Opportunities for other types of holiday accommodation are dealt with by other policies of the Plan.

Policy options:

First consideration is given to whether a specific tourism accommodation policy is required. The saved 2006 Rother District Local Plan tourism policies EM10 and EM12 will be superseded when this new Plan is adopted. Policy EM10 has been most commonly used to date. Policy EM12, which relates to the winter storage of caravans, has very rarely been called upon.

Future reliance on Core Strategy Policy EC6, together with RA2, is not considered adequate for development management purposes, although these do provide the overall context and line of conformity for a more detailed policy relating to development proposals for holiday accommodation.

Two options have been considered and subject to Sustainability Appraisal:

Option A: A more open approach to allowing new holiday development, positively supporting them for the economic benefits, to be read alongside policies to safeguard the countryside and particularly the High Weald AONB.

Option B: A more restrictive approach with detailed criteria which prevents establishment of new large scale sites and which sets strict criteria against which new proposals are judged, notably to ensure against harm to the intrinsic character of the countryside and particularly to the High Weald AONB.

Inevitably, it is found that there are strengths and weaknesses in both approaches, with the former more aligned with economic and, to a degree, social objectives, while the latter would better meet environmental objectives.

The national value of the vast majority of the District's AONB landscape provides a critical starting point, as does the extent of both coastal and fluvial flood risk areas. However, even giving great weight to this context, there is still considered to be opportunities for sensitive holiday site proposals that would support the local economy, mainly by promoting small-scale proposals and on improving the quality of existing sites.

The proposed policy is presented below accordingly.

Policy DEC2: Holiday Sites

In the countryside, camping, caravan and purpose-built holiday accommodation will only be acceptable in the following circumstances:

- (a) In all cases, the proposal:**
 - (i) must have an acceptable environmental impact especially when viewed from public vantage points;**

- (ii) must not significantly detract from the needs of agriculture;
 - (iii) must not adversely affect the amenities of residents in nearby dwellings;
 - (iv) must be accompanied by landscaping proposals appropriate to the local landscape character;
 - (v) must not be in an area that is not defended against the 1 in 100 year fluvial or 1 in 200 year tidal flood event;
 - (vi) must not harm the rural character of the area where there is any increase in the site area or new structure; and
 - (vii) must meet other policies of the Plan.
- (b) In relation to new permanent accommodation, is either:
- (i) a proposal of a modest scale for low key, high quality self-catering accommodation that requires only limited ancillary facilities and can be accommodated within the natural environment, or
 - (ii) a proposal that comprises a limited amount of accommodation to enhance another existing countryside recreational use and is wholly ancillary to that use.
- (c) In relation to static caravan, chalet or lodge accommodation within an existing site, is either:
- (i) a proposal that would result in a significant improvement in the appearance and quality of accommodation of that site, or
 - (ii) a proposal for the limited extension of that site to a natural boundary, and makes a significant improvement in the appearance and quality of accommodation.
- (d) In relation to a touring caravan or tented camping proposal, it is of a small scale appropriate to the area and, where the temporary use of land is permitted, any ancillary facilities necessary to serve the site will only be permitted on a similar temporary basis or, if they are of a permanent nature, are compatible with the local character of the area.
- (e) In order to prevent the residential use of permanent accommodation intended for solely for tourists, the occupation of holiday chalets, lodges static holiday caravans, touring caravans and camping sites will be restricted to holiday/leisure purposes only and will be subject to occupancy conditions relevant to the site.

QUESTION 16a: Do you agree with the policy approach to holiday sites and the proposed policy wording?

Existing employment sites and premises

- 9.27. Planning for improved job opportunities is a fundamental part of the Council's overall development strategy as contained in its adopted Local Plan Core Strategy (2014). Hence, it sets targets for the amount of additional business floorspace on employment sites¹, alongside those for housing growth. The business floorspace targets are expressed as minima, reflecting the objectives of the strategy to increase overall prosperity, improve access to a wider range of jobs and increase economic activity at a realistically achievable level, but without setting a cap on economic growth.
- 9.28. Core Strategy policies EC2 – EC5 provide a strategic framework for how business floorspace targets are to be met. Policy EC2 identifies the need for a broad range of supply to be available. It looks for the majority of space to be on sites opened up by the construction of the Bexhill to Hastings Link Road (now open and called Combe Valley Way) and to an increase in the supply of high quality sites, as well as a spread of small and medium-sized sites and premises across the District, especially in settlements with good strategic access. This includes access to the sea, provided at the Port of Rye. It also sees mixed-use developments as a potentially valuable opportunity to deliver jobs growth in parallel with housing, including in relation to providing offices in central locations.
- 9.29. Core Strategy Policy EC3 recognises that existing employment sites will continue to provide the large majority of accommodation to meet the needs of businesses. On this basis, it puts forward a policy to make effective use of existing sites and premises in terms of:
- retaining land and premises currently (or last) in employment use in such use unless it is demonstrated that there is no reasonable prospect of its continued use for employment purposes or it would cause serious harm to local amenities;
 - permitting intensification, conversion, redevelopment and/or extension having regard to other policies of the Plan;
 - facilitating access/environmental improvements, where appropriate; and
 - in circumstances where a continued purely employment use of a site/premises is demonstrated not to be viable, looking firstly at mixed-use schemes in order to make most effective use of the property for employment purposes; if a mixed use scheme is not viable, prioritise alternative community uses, affordable housing and then market housing, subject to local needs.
- 9.30. At the same time, this policy is made subject to a full review of existing and potential sites for employment use, in tandem with looking to allocate sites, to ensure that the requirements are secured in an effective way.
- 9.31. This Review has been completed and its findings form the basis of the further consideration of Policy EC3 – set out below - as well as the allocation of additional sites.

¹ 'Employment sites' are defined as those providing for business uses falling with Class B of the Use Classes order together with similar 'sui generis' uses.

- 9.32. The Review also has regard to Core Strategy Policy EC4, which provides for:
- continuing to give priority to the re-use and adaptation of suitable buildings in the countryside for employment (including for tourism purposes), in accordance with the Rural Areas policies;
 - incorporating an appropriate level of business development within residential allocations and developments to contribute to the overall development strategy, where such accommodation is otherwise appropriate in the site circumstances; and
 - facilitating (where permission is required) business activities operating from residential properties wherever there is no adverse impact on local character and amenities, including by traffic generation.
- 9.33. Policy EC5 further requires particular regard to meeting the needs of key sectors, notably “enviro-industries”, engineering, financial and business services and other growth and knowledge-based businesses, and those that are directly related to sensitive land management.

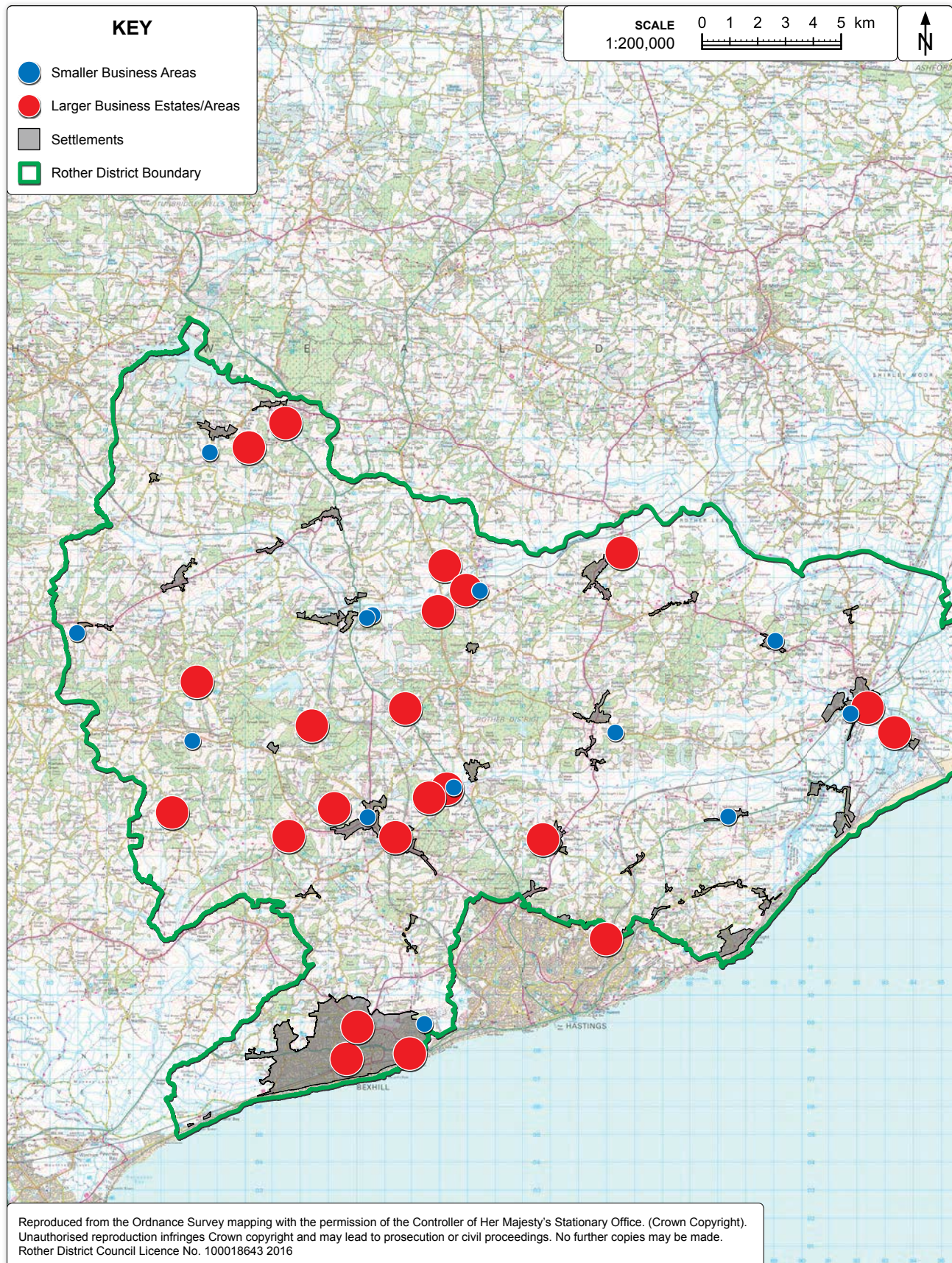
Employment Sites Review

- 9.34. The Employment Sites Review has been published and is available to view under ‘Background Evidence Studies’ in the Planning Policy section of the Council’s website. It firstly identifies the national and local policy framework for the review, including the employment land requirements of the Core Strategy (which are adopted and not themselves being reviewed), then undertakes an assessment of the function and capacity of all the more significant estates and areas, supplemented by a sample of 13 smaller areas distributed across the District, as shown on Figure 5 overleaf. It then looks at potential of committed, allocated and vacant sites and, finally, at options for providing additional land. The distribution of the areas/estates is shown on Figure 5 below.

Economy

Existing employment sites and premises

Figure 5. Employment Sites - Rother



9.35. The main findings of the review are:

- (1) of the 21 larger areas/estates (over 2ha in towns or 1ha in rural areas), there is a good distribution across the District, albeit the amount in Rural Areas is skewed by the size of the British Gypsum's operational area. Harbour Road, Rye is by far the largest estate, with Beeching Road, Bexhill being the only other estate over 10ha;
- (2) looking at the typologies of the areas, there is a severe lack of high quality office and business park sites capable of attracting inward investment of high-growth companies and/or headquarters;
- (3) there is a very high occupancy level across both the larger areas/estates and the sample of small business areas;
- (4) all of the identified sites perform valuable functions, a few of which have the potential for intensification of space within their current boundaries, but only a couple have scope for outward expansion;
- (5) of the 7 areas/estates with intensification potential, 3 of these are already recognised through planning permissions, with Harbour Road, Rye having by far the greatest potential, with over 15,000sqm of floorspace benefiting from an outstanding planning permission;
- (6) the main estates in Bexhill and Battle - Beeching Road, Bexhill and Station Approach, Battle – are both identified as having potential for redevelopment although the former may also meet an unmet retail requirement, so a net loss of B-class space is more likely;
- (7) for all the business areas that are the subject of Neighbourhood Plans, further consideration of both development needs, in terms of local business needs and market potential, should be undertaken as part of those plan-making processes;
- (8) for Bexhill, the earlier 2006 Local Plan (Policy BX3) allocation for 'land north of Sidley' will provide for enough further high quality space to meet the needs of the town and the wider area, but should be complemented by other provision for modern office and light manufacturing/workshop space via intensification at Elva Way and as part of the approved mixed-use development off Barnhorn Road;
- (9) also at Bexhill, the option of a high tech/R&D/office scheme in a "campus" setting at the former Northeye site a little to the west of the town is mooted;
- (10) for the Hastings Fringes, it finds that the Core Strategy business floorspace requirement may be appropriately met by the outstanding 2006 Local Plan allocation (Policy HF1) to the north of Burgess Road on the Ivyhouse Lane Estate, but supplemented by a further small extension to marry in with ones proposed by Hastings Borough Council on adjoining land;
- (11) existing sites are expected to meet some two-thirds of the 10,000sqm Core Strategy requirement for Battle (which embraces sites in Marley Lane, albeit some sites are in Sedlescombe parish), while a previously allocated site on the south side of Marley Lane is still expected to come forward to contribute to the balance;

- (12) there is found to be scope for intensification (and possibly expansion) at the Rutherfords Business Park, as well as at the Station Approach Business Area; hence, it is recommended that these are further investigated through the ongoing Battle Neighbourhood Plan;
- (13) for Rye and Harbour Road, it notes that the lower end of the minimum floorspace target is already provided for by outstanding planning permissions at Harbour Road Industrial Estate but adds that, given its strategic role, identified opportunities for further intensification would most appropriately be provided for by an enabling policy, which would also need to fully acknowledge the need to not adversely impact on the surrounding nature conservation designations;
- (14) at the same time, encouragement is given to Rye Town Council, through its Neighbourhood Plan, to consider the potential to promote higher density office-led schemes in more central locations;
- (15) the Rural Areas have seen most business development in recent years, as well as accounting for the greatest amount of floorspace with full planning permission, which together approximate to the minimum floorspace target;
- (16) these findings point to the role that rural areas are playing in meeting the accommodation requirements of businesses and, hence, to the economic growth of the District, and it is recommended this trend should not be frustrated;
- (17) there are obvious difficulties in identifying further sites in rural areas, due to both development economics and environmental constraints, compounded by the fact that supply is very fragmented and tends to be occupier-led; and
- (18) hence, for the Rural Areas, the most appropriate approach is regarded as taking a criteria-based approach to further business development, supported by continued application of the policy of resisting the loss of existing business sites and floorspace to other uses unless there is very clear evidence that it is not needed and the application of Core Strategy Policy EC4.

9.36. The finding in respect of drawing on the potential of existing sites and premises in rural areas is directly relevant to the Core Strategy Policy EC3. Indeed, it is clear from the assessment of the business estates and areas in the towns as well that the continued presumption to retain existing employment sites is justified across the District.

9.37. Notwithstanding this, there are a few instances where retaining employment sites are not found to be warranted. Alternative proposals are put forward in the relevant settlement sections in this Plan or can be expected to come through the relevant Neighbourhood Plan.

Policy options:

The Sustainability Appraisal considered two options:

Option A: Roll forward Core Strategy Policy EC3 (excepting those sites not found to be needed or acceptable for continued business use)

Option B: Replace Policy EC3 with a policy that simply requires consideration of both business and housing needs in determining future use

Option B is found to be likely to give a further boost to housing supply, mitigated by the fact that relevant Plans will have identified sufficient sites to meet housing targets, but is not really supportive of economic growth, not least due to the added pressure it would put on the “hope value” of business sites.

In environmental terms, both options look to use brownfield land effectively, but the impact of finding new sites for business is seen as likely to put more pressure on greenfield sites in less sustainable locations, where land values are lower.

Hence, **Option A is the preferred policy approach.**

The wording of the opening paragraph of Core Strategy Policy EC3 needs to be updated to reflect the review having taken place. The proposed policy wording is set out accordingly below.

Policy DEC3: Existing Employment Sites and Premises

Effective use of existing employment sites will be secured by:

- (i) **land and premises currently (or last) in employment, including tourism, use being retained in such use unless it is demonstrated that there is no reasonable prospect of its continued use for employment purposes or it would cause serious harm to local amenities;**
- (ii) **permitting intensification, conversion, redevelopment and/or extension having regard to other policies of the Plan;**
- (iii) **facilitating access/environmental improvements, where appropriate; and**
- (iv) **where continued employment use of a site/premises is demonstrated not to be viable, permitting complementary enabling development as part of an overall scheme to make most effective use of the property for employment purposes; if a mixed use scheme is not viable, prioritising alternative community uses, affordable housing and then market housing, subject to local needs.**

- 9.38. This policy will effectively supersede Core Policy EC3 as the strategic policy in respect of existing employment sites.
- 9.39. Cross-reference is made to Policy DCO1 in the Communities Chapter in relation to the marketing that would be expected in order to establish whether there is a reasonable prospect of continued business use of a site.

QUESTION 17: Do you agree with the policy approach to existing employment sites and the proposed policy wording?

10. Environment

Landscape and the High Weald Area of Outstanding Natural Beauty

- 10.1. The importance attached to maintaining and reinforcing landscape character across Rother district is clearly set out in Chapter 17 - Environment of the Local Plan Core Strategy. Its 'landscape stewardship' Policy EN1, identifies the principal landscape assets and provides an over-arching framework to ensure that new development makes a positive contribution to the landscape character of the area in which it is to be located.
- 10.2. Landscape character varies across the district. At a national scale, much of Rother falls within the 'High Weald' national character area (NCA), with the south-eastern part in the 'Romney Marshes' area and a small swathe of land west of Bexhill in the 'Pevensy Levels' area. The boxes below summarises the key characteristics of each NCA in Rother district:

High Weald

- a well-wooded landscape rising above the Low Weald;
- distinctive and scattered sandstone outcrops;
- main roads and settlements are sited along prominent ridgelines with a dense network of small winding lanes linking scattered villages, hamlets and farms;
- the legacy of the early iron industry has left extensive areas of coppice woodland and hammer ponds;
- high forest, small woods and copses, and a network of hedges, shaws link small irregular fields created from cleared woodland;
- flower rich meadows bordered by species rich hedgerows;
- heavy clay soils have reduced the impact of agricultural change in the area and it is still, in the main a quiet pastoral landscape with mixed farming predominating;
- the cultivation of fruit and hops, together with the associated distinctive oast houses;
- distinctive red tile, brick, local stone and timber building materials, often including hung tiles and white weatherboarding are characteristic of historic settlements, farms and cottages; and
- recent 'suburbanization' of farmstead buildings is eroding the distinctive local style in many places.

Romney Marshes

- flat open agricultural landscape with distinctive drainage dykes, marshes and open skies;
- extensive arable fields, open wet pasture land. Narrow straight roads and dispersed settlements. Open character and remoteness;
- high nature conservation value in wet grazing marshes;
- former sea cliffs mark the post glacial shoreline. The Royal Military Canal at the base of these cliffs;
- 20th century development in the coastal strip; and
- the sharp contrast between shingle coast, low lying agricultural land and the raised cliff.

Pevensey Levels

- low lying tract of reclaimed wetland;
- open landscape with extensive grazed wet meadow windswept with few trees; and
- widely spaced roads and isolated settlements provide a sense of remoteness.

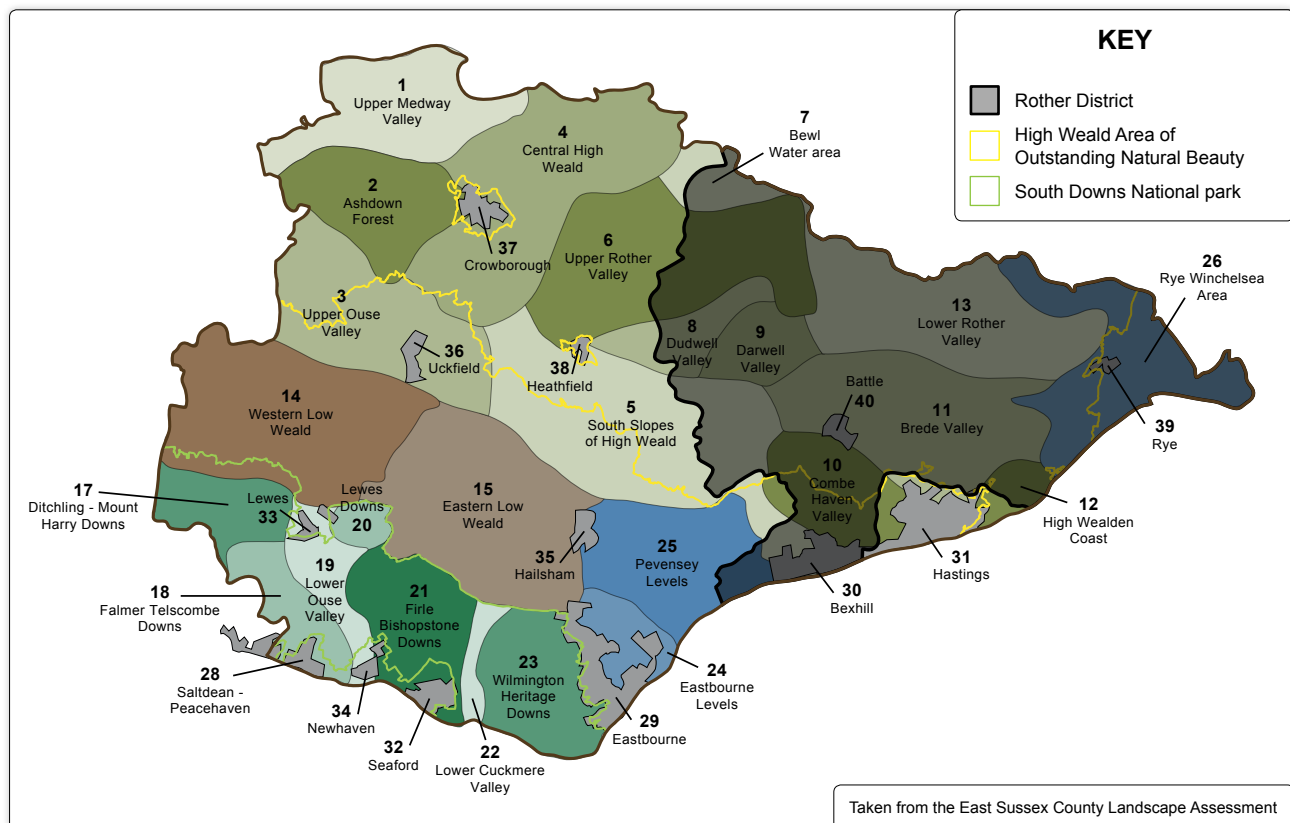
- 10.3. Within these unique regional areas with similar landscape character¹, the [East Sussex Landscape Character Assessment](#) (LCA) provides more detailed descriptions at a local level, reflecting the particular pattern of elements derived from geology, landform, topography, flora and fauna, physical features and settlement. The LCA Index Map, as it relates to Rother is reproduced below. The key features and “action priorities” for each character area are identified in the [Assessment](#) document.

¹ See Countryside Character Volume 7: South East and London, The Countryside Agency, 1999

Environment

Landscape and the High Weald Area of Outstanding Natural Beauty

Figure 6. Local landscape character areas in Rother



- 10.4. Due to their nature conservation status and consequent very limited development, the Pevensey Levels and Romney Marshes enjoy high degree of tranquility, at least for the most part. Even though never far from a farm, some small-scale scattered dwellings or settlement, the same is true of large swathes of the High Weald. East Sussex County Council published 'Remoteness at the Local Scale – An Application in East Sussex' some time ago; its identified 'areas of remote countryside' and areas of exceptional remoteness' are still helpful maintaining the peace and tranquility of remote rural areas.
- 10.5. One aspect of this rurality is the existence of "dark skies"; that is, the relatively limited amount of night glow from street lights and other sources. Characteristics of tranquility and dark skies are valued by local people. A separate policy in relation to lighting, put forward in the Environmental Pollution section, provides a policy basis, and associated guidelines to assist in maintaining these characteristics. Particular care will be taken, over and above the regard to the features of local landscape, to the feeling of remoteness that exists when a site is physically and visually separated from the noise and activity of urban areas, as well as from associated features and activities (such as busy roads, pylons, sport and leisure venues, etc.).

The High Weald Area of Outstanding Natural Beauty

- 10.6. The High Weald is of national as well as local landscape value, as reflected by its designation as an Area of Outstanding Natural Beauty (AONB). Also, its landscape is defined in the High Weald AONB Management Plan in terms of the interplay of the “components” that make it distinctive. These key features, which are mapped and published on the High Weald AONB website, are:

Geology, landform, water systems and climate

- Sandrock outcrops
- Gill streams

Settlement

- Dispersed settlement pattern
- Historic farmsteads

Routeways

- Drove ways
- Sunken lanes

Woodland

- Ancient woodland
- Archaeological remains

Field and heath

- Unimproved grassland
- Heathland
- Historic field boundaries

- 10.7. National policy (NPPF paragraphs 109, 113, 123 and 125) highlights the need to recognise the intrinsic value of landscape and countryside to local identity and sense of place, and the great weight attached to conserving and enhancing the landscape and scenic beauty of AONBs (paragraphs 115, 116).
- 10.8. It follows that a proper understanding of the local landscape, which will include its historic characteristics, is necessary in order to produce developments that meet these objectives.

- 10.9. In assessing landscape impact, the High Weald components and/or the characteristics of the relevant Landscape Character Area provide an appropriate assessment framework for evaluating the siting, layout and design (including materials) of development. For example, existing landscape features that are important to local character should normally be retained, with new features that are typical of the locality, fit naturally into the landscape and complement existing features also incorporated into developments.
- 10.10. The scale of development is also sensitive to its location. While new development is not ruled out, national policy seeks to restrict major development in AONBs. A certain level of development has already been accepted through the Local Plan process as being capable of being satisfactorily and sustainably accommodated in and around the towns and villages within the AONB. However, given that the High Weald is essentially a “small scale” landscape, further major development over and above that necessary to meet local housing and other needs will rarely be justified in the public interest.
- 10.11. The following policies elaborate on the relevant Core Strategy policies in respect of promoting landscape-led approaches to the consideration of the suitability of development proposals, both generally and with specific regard to the High Weald AONB. They should be read in conjunction with Core Strategy policies EN1-EN5 and RA2, as well as other policies in this Plan, notably those relating to sustainable drainage and biodiversity and green space. It is also noted that developments for housing, business, solar and wind farms, recreation and tourism uses are each the subject to separate policies in the Local Plan, with the emphasis on locations outside of environmentally sensitive areas and, where appropriate within them, on a small scale.

Policy options:

Both national policy and established Core Strategy policies set out to conserve and enhance valued and distinctive landscapes. Core Strategy EN1 highlights the nationally designated Area of Outstanding Natural Beauty, other designated sites, the undeveloped coast and remote areas, as well as key features. However, this may be supplemented by specific reference to landscape-scale character assessments as a basis for considering planning applications.

Option A: New policy setting out the basis for assessing local landscape character impacts. This would incorporate reference to specific landscape character documents at both the district-wide and AONB level. It could set criteria for determining remoteness and applying ‘dark skies’ approaches.

Option B: Rely on Core Strategy EN1 and national policies. National policies for conserving the natural environment are in section 11 of the NPPF.

The East Sussex Landscape Character Assessment and the High Weald AONB Management Plan provide critical detail about local landscape character. Incorporating references to these in policy would add value to Policy EN1, as would setting out a policy in Development Management terms. The SA/SEA indicates that there would be some benefits to natural environment objectives by this approach. Given the national importance of the High Weald AONB and its local coverage, a separate policy is warranted. This should also highlight the historic landscape character. Therefore, Option A is preferred, although Ancient Woodlands are already clearly protected by the NPPF (paragraph 118) so would not benefit from further policy coverage. The proposed policies are set out below.

Policy DEN1: Maintaining Landscape Character

The siting, layout and design of development should maintain and reinforce the natural and built landscape character of the area in which it is to be located, based on a clear understanding of the distinctive local landscape characteristics (see Figure 6 above), in accordance with Core Strategy Policy EN1.

Particular care will be taken to maintain the sense of tranquility of more remote areas, including through maintaining 'dark skies' in accordance with Policy DEN6.

Policy DEN2: The High Weald Area of Outstanding Natural Beauty (AONB)

Development within or affecting the setting of the High Weald AONB shall conserve and seek to enhance its landscape and scenic beauty, having particular regard to the impacts on its character components, as set out in the High Weald AONB Management Plan.

Such development should be small-scale, in keeping with the landscape and settlement pattern. Except where necessary to meet strategic development requirements and demonstrated to have acceptable environmental impacts having regard to alternatives taking into account mitigation, major development will be resisted.

QUESTION 18: Do you agree with the policy approaches to maintaining landscape character and the High Weald AONB and to the respective proposed policy wordings?

Strategic Gaps

- 10.12. Strategic Gaps are regarded to be of strategic importance in terms of guiding the location of development. The particular objectives of the Gaps are:
- To maintain the separate identity and distinctiveness between settlements.
 - To maintain the strategic settlement pattern.
 - To prevent the coalescence of settlements.
- 10.13. Their protection through local plans is an established policy tool. They were defined and protected in the Rother District Local Plan 2006 (Policy DS5 refers). Development within these Gaps has been strictly limited to maintain their openness, although does allow for agricultural buildings, conversions and the replacement of an existing building.
- 10.14. The principle of these Strategic Gaps has been carried forward in the Council's adopted Local Plan Core Strategy (2014) where policies HF1 and RY1 highlight the need to maintain the Gaps between:
- Bexhill and Hastings/St Leonards
 - Battle and Hastings/St Leonards
 - Crowhurst and Hastings/St Leonards
 - Fairlight and Hastings/St Leonards
 - Rye and Rye Harbour
- 10.15. Accordingly, there is a need to now review the actual extent of these Gaps as previously defined and redefine them through this Plan in line with the above objectives.

Review of the extent of the Strategic Gaps

- 10.16. East Sussex County Council County's Landscape Officer has undertaken a full assessment of the extent of the five identified Gaps within the District. The Assessment produced the following outputs:
- An assessment of the landscape of each Gap to review its current quality, value and condition. The sensitivity of the landscape to change and vulnerability to potential development pressure.
 - A visual analysis of the Gaps, including an assessment of the visual characteristics of the urban edges, views and identification of visually intrusive elements of the Gaps.
 - Analysis of the effectiveness of the physical and visual state of the current Gap boundaries.
 - Guidelines for landscape management and enhancement which would strengthen the Gap landscapes.

- 10.17. Further details can be found in the Strategic Gaps Landscape Assessment, March 2016 which has been published as a Background Paper.
- 10.18. The findings for each Gap are summarised below. They should be read in conjunction with Figure 7 - in relation to the Strategic Gaps between Bexhill and Hastings/St Leonards, Crowhurst and Hastings/St Leonards, Battle and Hastings/St Leonards, Figure 8 - in respect of that between Fairlight and Hastings/St Leonards, and Figure 9 - for the Gap between and Rye and Rye Harbour.

Bexhill and Hastings/St Leonards

- 10.19. The Gap between the two towns is relatively small, being particularly narrow along the A259 corridor, and hence highly vulnerable to development pressures that would compromise the Gap objectives.
- 10.20. The perception of the Gap between Bexhill and Hastings has been subject to considerable change recently with the construction of Combe Valley Way, which opens up the countryside between Bexhill and Hastings/St Leonards.
- 10.21. Given the new views from Combe Valley Way and the Greenway which provides a pedestrian/cycle/bridleway route from Bexhill to St Leonards, it is recommended that the boundaries of the Gap are extended to encompass the Combe Haven valley and its tributary valleys in order to protect this open landscape between the two settlements. The small area of land within Glyne Gap which is in Rother District should also be included in the Gap boundary.

Crowhurst and Hastings/St Leonards

- 10.22. Whilst the Gap defined in the 2006 Local Plan still generally reflects the policy objectives, the omission of the area between the built up edge of Crowhurst and the Hastings to London railway line would leave this area vulnerable to development. From a landscape character and visual perspective, this land is an important part of the open area between the settlements and it is recommended that this is included in the Gap boundary.

Battle and Hastings/St Leonards

- 10.23. The Gap between Battle and Hastings/St Leonards, as defined in the 2006 Local Plan, still generally meets the policy objectives. However, the area to the west of Forewood Lane on the southern edge of Battle, behind existing frontage development along Hastings Road is found to not contribute to separation between the towns, even though it is valuable as part of the High Weald AONB setting of Battle and therefore still protected by countryside and AONB policies. It is recommended that the western boundary of the Gap is reviewed to follow an alignment along Forewood Lane as this would not compromise the effectiveness of the Gap between Battle and Hastings.

Fairlight and Hastings

- 10.24. The Gap between the Hastings Borough boundary and the edge of Fairlight Cove provides an important function in protecting the general openness of the area between the Hastings Country Park and the edge of the settlements of Fairlight and Fairlight Cove. While the 2006 Local Plan excluded developed land in this area, it is vulnerable to incremental change and infill development. It is recommended that these areas are included in the gap to conserve the open character of the gap between Fairlight and Fairlight Cove.

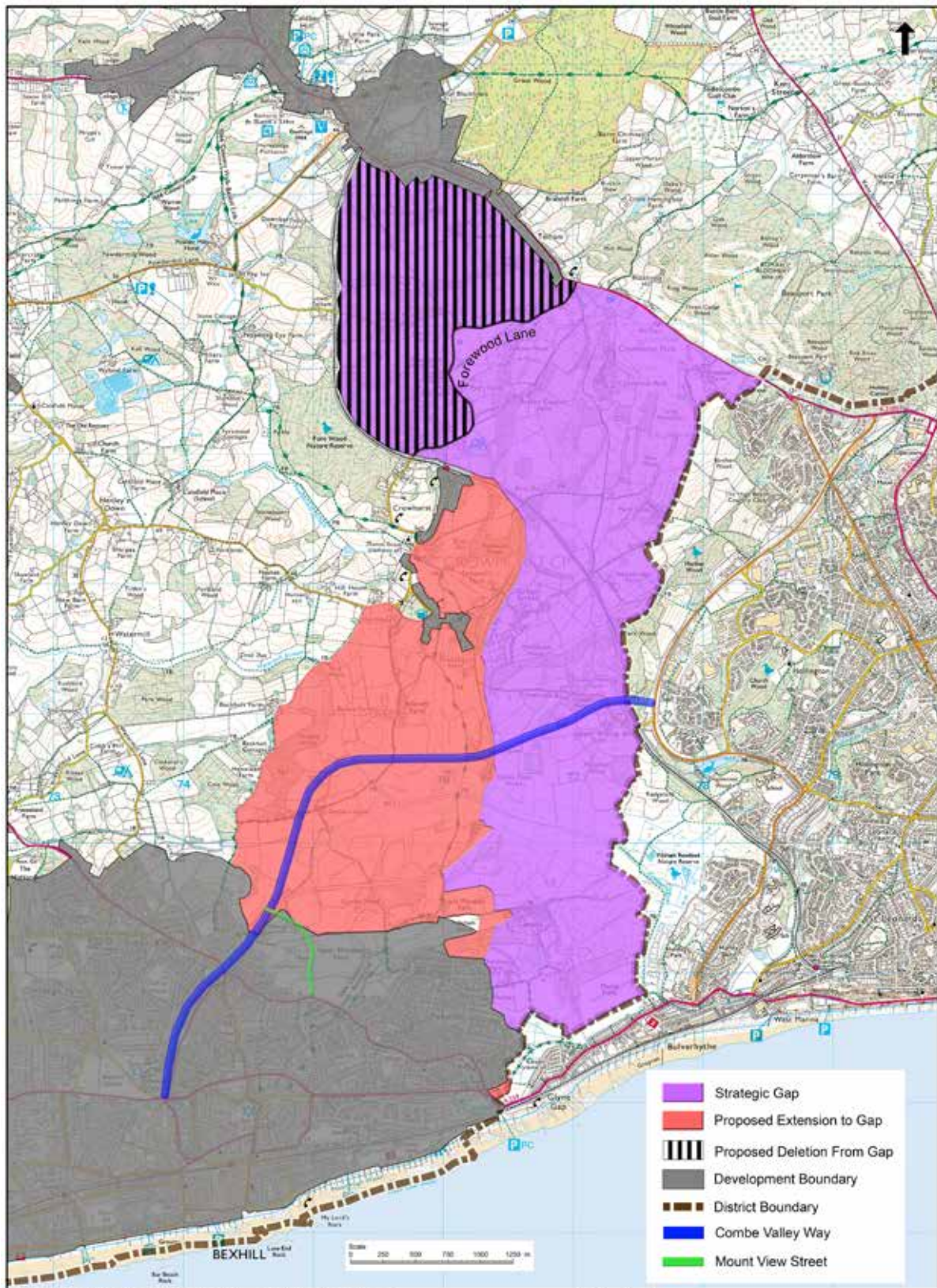
Rye and Rye Harbour

- 10.25. The Gap between Rye citadel and Harbour Road industrial area and Rye Harbour village does provides an important function in retaining the separate and distinct identity of the two settlements. The area is fragile and vulnerable to encroaching development and incremental changes in landscape management. The retention and protection of this Gap area is important to the conservation and enhancement of local landscape character and views especially with regard to the setting of the Citadel. A small extension to the Gap to also incorporate the sensitive riverside margin is recommended, as this is contiguous with and inseparable from the Gap landscape.

Conclusions

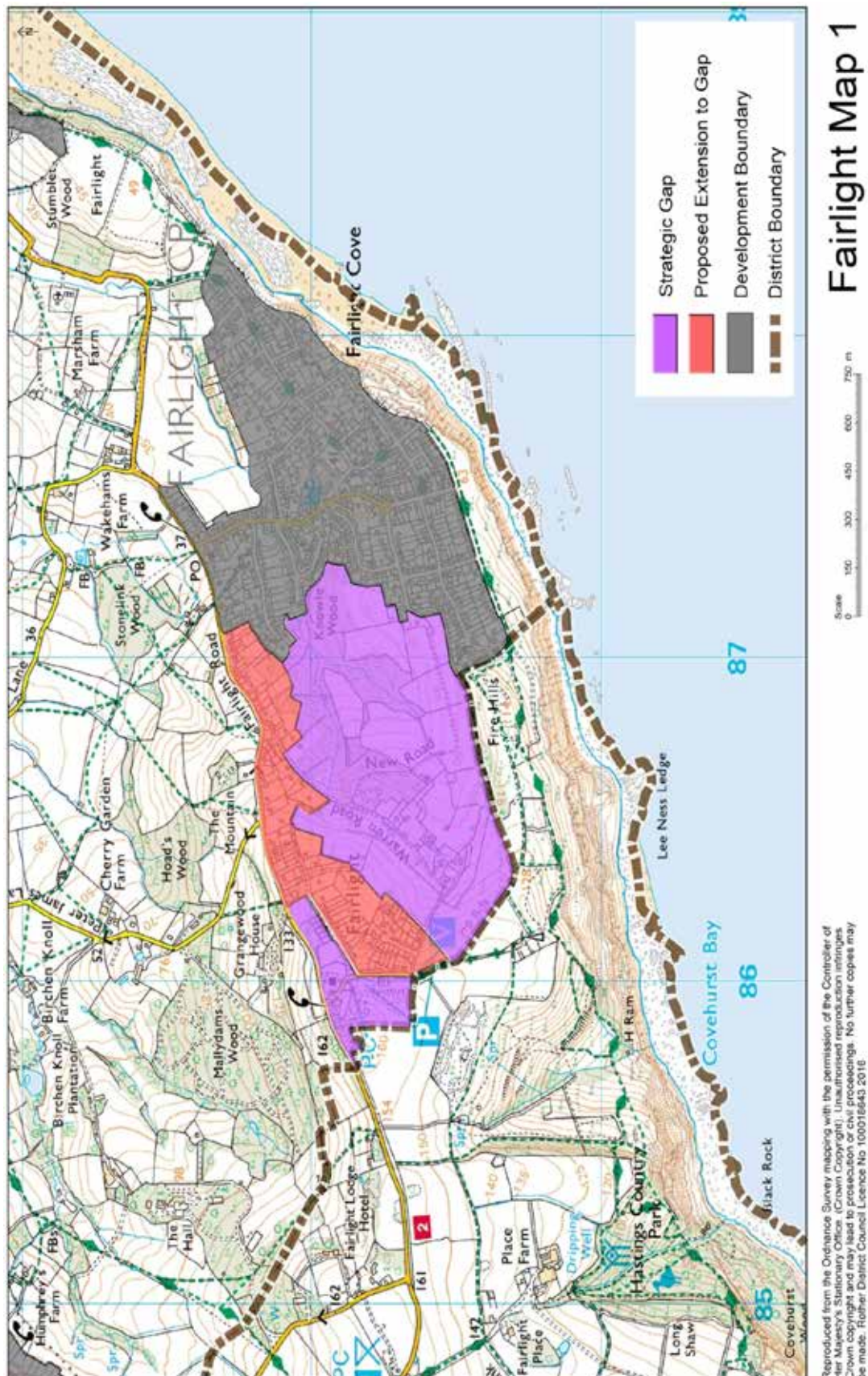
- 10.26. It is proposed that the Strategic Gaps be refined as recommended by the recent Strategic Gaps Landscape Assessment for the reasons set out above. This is supported by the Sustainability Appraisal, which found that, generally, the recommended boundaries somewhat better meet environmental objectives. In respect of the Hastings-Battle Strategic Gap, the revision is seen as more appropriate in terms of the specific function of the Gaps, as set out in the Core Strategy.

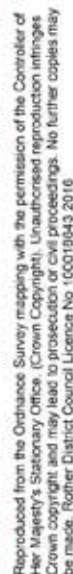
Figure 7. Strategic Gaps between Bexhill and Hastings/St Leonards, Crowhurst and Hastings/St Leonards, Battle and Hastings/St Leonards



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Figure 8. Strategic Gap between Fairlight and Hastings/St Leonards





Policy DEN3: Strategic Gaps

The Strategic Gaps are identified on the Policies Map between the following areas:

- (i) Bexhill and Hastings/St Leonards;
- (ii) Crowhurst and Hastings/St Leonards;
- (iii) Battle and Hastings/St Leonards;
- (iv) Fairlight and Hastings/St Leonards; and
- (v) Rye and Rye Harbour

Within these Gaps development will be carefully controlled and development will only be permitted in exceptional circumstances. Any development must be unobtrusive and not detract from the openness of the area.

Enhancement of the Gaps through effective landscape management which strengthens and reinforces their significance as protected landscape areas will be supported.

QUESTION 19: Do you agree with the proposed definition of the Strategic Gaps, and the policy applying to them? If not, what changes would you wish to see?

Biodiversity and green space

- 10.27. The biodiversity interest in Rother is substantial and wide-ranging. In the south-west of the district, the Pevensey Levels are designated as being of international importance as a wetland habitat, whilst the eastern side of the District (Rye Harbour, Winchelsea, Camber, Pett area) is extensively covered by several European designations reflecting their value for birds and as wetland habitats. There are many nationally-important Sites of Special Scientific Interest (SSSIs), covering about 9% of the district in total, as well as some 60 locally-designated wildlife sites¹. Ancient woodlands, of which Rother has the highest concentration in the South-East, are also associated with biodiversity interest, while many nationally-defined 'Biodiversity Action Plan' (BAP) habitats and species are also present in the district, often beyond the internationally, nationally and locally designated sites.
- 10.28. Core Strategy Policy EN5 provides an over-arching policy commitment to protect and enhance the biodiversity, geodiversity and green space (or "green infrastructure") of the District. This relates not only to the statutory designations, but also to local sites of biodiversity value and the array of "multi-functional" green spaces that variously provide recreational opportunities, flood management, climate change mitigation and 'green transport' corridors, as well as nature conservation.
- 10.29. Policy EN5 highlights:
- developing a district-wide network where possible linking areas of natural green space;
 - protecting and enhancing the international, national and locally designated sites;
 - establishing the Combe Valley Countryside Park, between Bexhill and Hastings;
 - enhancing the Romney Marsh Biodiversity Opportunity Area;
 - supporting habitat opportunities in line with the Biodiversity Opportunity Areas and targets set out in the Sussex Biodiversity Action Plan;
 - developing the wetland habitat at Bewl Water Reservoir;
 - access to the countryside from urban areas, especially in the Hastings and Bexhill fringes;
 - ensuring that development retains, protects and enhances habitats of ecological interest; and
 - avoiding adverse impacts from development on biodiversity or, where wholly unavoidable, providing appropriate mitigation or compensation, as well as considering and promoting opportunities for the creation and/or restoration of habitats appropriate to local context.

¹ Sites of Nature Conservation Importance (SNCIs)

- 10.30. It follows that proposals which are focused primarily on these objectives should be supported. This will include developments to increase public understanding and enjoyment of biodiversity and green spaces, such as through “green corridors” and interpretation facilities. This approach accords with paragraph 118 of the National Planning Policy Framework (NPPF), which sets out how biodiversity should be taken into account in determining a planning application.
- 10.31. In relation to the international wildlife sites, European regulations require that councils ensure that no significant harm comes to them. This is reflected in a requirement, when preparing development plans, to undertake ‘Habitat Regulations Assessments’ (HRA) for such sites. These were undertaken for the Core Strategy. One issue highlighted was the potential impact of tourism policies on the Dungeness complex. In response to this, the Council, in partnership with Shepway District Council, Natural England and other environmental bodies, is preparing a ‘Sustainable Access Strategy’ to manage future visitor access in and around the Dungeness complex to ensure that no adverse effect will occur.
- 10.32. Core Strategy Policy EN5 gives the overarching policy to ‘(iv) Enhance the nature conservation value and multi-functional nature of the Romney Marsh Biodiversity Opportunity Area.’ It is envisaged that this will be elaborated upon in the Submission version of this Plan, with appropriate practical provisions, including for reducing trampling pressure on vegetated shingle, taking account of the recommendations of the Sustainable Access Strategy.
- 10.33. A further outcome of Core Strategy’s HRA was a need to control the quantity and rate of run-off within the hydrological catchment of the Pevensey Levels. This is addressed by Core Strategy Policy SRM2 and the Drainage policy within this Plan.
- 10.34. Only in exceptional circumstances, would a proposal that would impact negatively on an international wildlife site be permitted, and only where there are no alternative solutions and the proposal is necessary for imperative reasons of over-riding public interest.
- 10.35. European Directives give protection to several species (generally referred to as ‘European Protected Species’), the most commonly occurring in Rother including great crested newt and bats. It is an offence to damage or destroy breeding or resting places of protected species, such as may occur by in-filling of or earthworks near to a pond used by great crested newt, felling of trees or demolition of buildings used by bats or the clearance of woodland or hedgerows supporting dormice.
- 10.36. SSSIs and Ancient Woodland are highly protected, with any development that would have an adverse effect only allowed in exceptional circumstances where the benefits of the development clearly outweigh the nature conservation impacts.

- 10.37. In accordance with 'Section 41 of the Natural Environment and Rural Communities Act (2006), the UK Biodiversity Action Plan (BAP) identifies those habitats of principal importance for the purpose of conserving biodiversity in England. These priority habitats are recognised by national policy, while those found in Rother are identified in the Council's Green Infrastructure Study.
- 10.38. There is also varying degrees of protection under Wildlife and Countryside Act for certain rare plants and for bird nesting habitats, limiting their removal to outside of the bird breeding season. The Sussex Local Nature Partnership lists the species that can be found in Sussex. These include water vole, common lizard, grass snake, slow worm and Roman snail.
- 10.39. The presumption is that development should avoid impacts on protected species, but where this is not possible, mitigation or compensation will be necessary.
- 10.40. Table 1 in the Green Infrastructure Study Addendum gives helpful advice on biodiversity opportunities within the landscaping of a development scheme to enhance its biodiversity value and ensure net gains for nature. Development could impact on populations of farmland birds and bats in particular, by direct loss of habitat but also through increased recreational disturbance. Thought should be given to the impact of lighting on bats, with areas of no or low level lighting along bat foraging routes considered.
- 10.41. Table 3 in the Green Infrastructure Study Addendum indicates some actions that developers should consider incorporating within built fabric to help conserve species that rely on buildings and ancillary developments for nesting.
- 10.42. In recognition that a focus on protecting important sites will not alone sustain biodiversity in the long term, Biodiversity Opportunity Areas (BOAs) have been identified², being those areas that are seen as offering the greatest benefit to wildlife, taking into account existing concentrations of BAP habitat and important areas for priority species, often being buffers around existing reserves or linkages between existing sites. There are nine separate BOAs within, or partially within, Rother District, as set out and mapped in the Green Infrastructure background paper, each supported by a statement identifying the features of biodiversity importance and targets for habitat maintenance, enhancement, restoration and creation.
- 10.43. Whilst Areas of Outstanding Natural Beauty (AONB) are landscape designations for the purpose of conserving and enhancing the natural beauty, it is notable that the term 'natural beauty' includes the conservation of flora, fauna and geological and physiographical features of an area. Furthermore, the High Weald AONB some of the key High Weald character features are also priority habitats³ (Ghyll woodland, sandstone outcrops, ancient woodland, heathland, wildflower meadows and ponds). Hence, particular consideration should be given to biodiversity gains that meet AONB objectives.

2 South East Biodiversity Partnership, 2008
3 Including both BAP habitats and 'Special to Sussex' habitats

- 10.44. The connectivity of habitats is important to enable dispersal of species across the wider environment. Green spaces, including any proposed or enhanced as part of new developments, should, wherever practicable, be linked. River valleys provide particularly important wildlife corridors. Provision of habitats and landscaping within developments that allow wildlife to live within and move through built areas to the wider countryside are encouraged, including hedgerows, ponds, trees as set out in Table 1 of Green Infrastructure Study Addendum.
- 10.45. Within these areas, consideration should be given to whether development will affect habitat connectivity and integrity, either positively or negatively; and opportunities to achieve the aims of the BOAs, including enhanced habitats and linkages to off-site habitats via green corridors.
- 10.46. In addition, green spaces should be planned with regard to other “ecosystem services” such as flood protection, microclimate control, filtration of air pollutants and enabling biodiversity to adapt to climate change.
- 10.47. The National Planning Policy Framework (NPPF) looks to the planning system to not only minimise impacts on biodiversity but also to provide net gains in biodiversity wherever possible⁴. It also looks to planning policies to promote the protection and recovery of protected species populations linked to national and local targets⁵. Similarly, as noted above, Core Strategy Policy EN5 part (ix) promotes habitat restoration and creation.
- 10.48. There will be opportunities for supporting biodiversity in virtually all developments. This may range from retaining and enhancing existing biodiversity features including hedgerows and ponds, providing landscaping and amenity green spaces that support biodiversity, creating new habitats (including as part of SuDS), ensuring adequate “buffering” of, and management regimes for, existing priority habitats within or adjacent to a site and providing linkages to the wider environment via green corridors.
- 10.49. Provision for biodiversity will largely depend on the particular local context and also have regard to the scale of development. Larger developments will generally provide more scope for biodiversity gains. In order that opportunities specific to a particular site are properly considered and, where appropriate, incorporated into the development planning and design processes, larger developments (of more than 2 hectares (ha) or 50 dwellings) will be expected to produce a “green infrastructure master-plan” as an integral part of proposals. Such masterplans should include measures for the ongoing management of habitats and other green spaces, which will be the subject of planning control.

4 Paragraph 109, NPPF, 2012
5 Paragraph 117, NPPF, 2012

- 10.50. A number of key references are available to inform the formulation of appropriate proposals to support biodiversity. These include:

International Nature Conservation Sites and Sites of Special Scientific Interest (SSSI)	Joint Nature Conservation Committee
European Protected Species	Habitats Directive
Nationally Protected Species	Joint Nature Conservation Committee
Sites of Nature Conservation Importance (SNCI) and Regionally Important Geological Sites (RIGS)	Sussex Wildlife Trust
Biodiversity Action Plan (BAP) Priority Habitats	Joint Nature Conservation Committee and Sussex Biodiversity Record Centre
Special to Sussex non-BAP Habitats	Sussex Biodiversity Record Centre
Ancient Woodland Inventory	Rother District Council
Local Biodiversity Opportunity Areas Reports	Sussex Local Nature Partnership
East Sussex Green Infrastructure Strategy	East Sussex County Council
Natural Character Areas map and East Sussex Landscape Character Assessment	Natural England and East Sussex County Council
High Weald AONB Management Plan	High Weald AONB Partnership
Rother Open Space, Sport and Recreation Study	Rother District Council

- 10.51. A further reference is the Council's own 'Green Infrastructure Study' incorporating its recent Addendum, which has drawn on a number of sources in summarising biodiversity opportunities by settlement. The Addendum provides, at Table 2, a helpful overview of the opportunities for each town and those villages with development requirements. It also provides useful tables listing potential means of incorporating biodiversity opportunities within landscaping, including bird nesting opportunities.
- 10.52. While the above sources of information are helpful, they cannot be exhaustive and should not be used as a substitute for site-specific ecological surveys. Where it is likely that a proposal will impact upon any protected species, designated site, priority habitat, or other biodiversity features on, or adjacent to, the application site, up-to-date survey information to determine their presence or absence should be provided with a planning application. The type of assessment needed will vary from an ecological survey and report, to an Environmental Impact Assessment (EIA) for a major site and an Appropriate Assessment if a European Site is involved. All ecological surveys need to be undertaken by a suitably qualified ecologist. It is important to bear in mind that the survey work needed to inform such assessments will be seasonally restricted.
- 10.53. As noted above, information on biodiversity impacts and opportunities should inform all stages of development, with an ecological assessment required where impacts are likely to be significant, where there is a reasonable likelihood of protected species being present and existing information is inadequate. Furthermore, proposals should be supported by a plan for their long term management.

- 10.54. The Council has already adopted open space standards through the 'Open Space, Sport and Recreation Study', as applied in Core Strategy Policy CO3. These standards, which include accessible natural or semi-natural green-space, apply in both urban and rural areas, where practicable and appropriate in the environmental context.
- 10.55. Separate policy consideration is given to landscapes, including the High Weald AONB, elsewhere in the Section. The Combe Valley Countryside Park is considered in the Hastings Fringes Chapter.

Policy options:

Two options have been considered and subject to Sustainability Appraisal:

Option A: Protection policy – This would take a typical development management approach of fulfilling requirements in respect of protected species and habitats, and of providing mitigation or compensation where necessary.

Option B: Enhancement policy – This would take a more positive approach by both seeking biodiversity enhancement from development, supported by details of appropriate opportunities.

The SA/SEA supports the more positive policy, as it offers not only environmental but also some social benefits that access to, and proximity to, natural green spaces or simply wildlife can bring. At the same time, the potential implications for housing costs should temper onerous requirements.

The following policy, that supplements Core Strategy Policy EN5, is proposed, highlighting the expectations of the Council in relation to conserving biodiversity when considering planning applications.

Policy DEN4: Biodiversity and Green Space

Development proposals should support the conservation of biodiversity and multi-functional green spaces in accordance with Core Strategy Policy EN5 and the following criteria, as applicable:

- (i) Proposals where the principal objective is to conserve or enhance biodiversity or geodiversity will be supported in principle.
- (ii) Development proposals should avoid significant harm to the biodiversity value of international, national, regional and local designated sites of biodiversity and geological value, (including Biodiversity Action Plan (BAP) priority habitats and/or protected species). Depending on the status of habitats and species concerned, this may require locating development on alternative sites that would cause less or no harm, incorporating measures for prevention, mitigation and (in the last resort) compensation.
- (iii) In addition to (ii) above, all developments will be expected to retain and enhance biodiversity in a manner appropriate to the local context, having particular regard to locally present BAP priority habitats and species, defined 'Biodiversity Opportunity Areas' and further opportunities identified in the Council's Green Infrastructure Study.
- (iv) Larger developments of more than 2 hectares or 50 dwellings (whichever is the smaller) will be expected to produce a Green Infrastructure masterplan as part of their proposals.

In respect of the Dungeness and Rye Complex of International Sites, the Council will develop proposals in conjunction with Shepway District Council for managing access to reduce the potentially damaging impacts of recreation and visitor pressure.

QUESTION 20: Do you agree with the policy approach to supporting biodiversity and green space and to the proposed policy wording?

Sustainable drainage

- 10.56. Nationally, there has been a heightened awareness in recent years of the risk of flooding following serious flood events and an increasing amount of more localised “flash floods”. Effective drainage systems are clearly crucial, requiring their design to be considered from the beginning of the development process.
- 10.57. National planning policy directs development away from areas of highest flood risk and, when deciding planning applications, ensuring that flood risk is not increased elsewhere and taking opportunities to reduce the causes and impacts of flooding¹.
- 10.58. Planning Practice Guidance states that, when considering major development, sustainable drainage systems should be provided unless demonstrated to be inappropriate². Generally, whether a sustainable drainage system should be considered will depend on the proposed development and its location. At the same time, it states that the general aim should be to discharge surface run-off as high up the following hierarchy of drainage options as reasonably practicable:
- 1) into the ground (infiltration);
 - 2) to a surface water body;
 - 3) to a surface water sewer, highway drain, or another drainage system; and
 - 4) to a combined sewer³.

This hierarchy supports a general presumption in favour of the use of sustainable drainage systems.

- 10.59. The Council’s overarching Core Strategy policies on managing flood risk (Policy EN6) and on flood risk and development (Policy EN7) follows this approach. It is considered appropriate to elaborate on this policy approach particularly in relation to promoting the effective development of sustainable drainage systems (SuDS).
- 10.60. East Sussex County Council has the responsibility of being the ‘Lead Local Flood Authority’ (LLFA), with the Environment Agency retaining responsibilities for managing flood risk from ‘main rivers’ and the coast. The County Council’s ‘Local Flood Risk Management Strategy’ sets out implications for drainage design based upon spatial characteristics which should complement site specific surveys undertaken as part of the drainage design process. This and related guidance are shown in the box below.

1 NPPF paragraph 100
2 PPG paragraph Reference ID: 7-079-20150415
3 PPG paragraph Reference ID: 7-080-20150323

Further Information on SuDS

- [East Sussex Local Flood Risk Management Strategy](#)
- [ESCC 'Guide to Sustainable Drainage Systems in East Sussex'](#)
- [ESCC 'SuDS Decision Support Tool for Small Scale Development](#)
- [DEFRA Non-Statutory Technical Standards for Sustainable Drainage Systems](#)
- [The CIRIA SuDS Manual C753 \[Published by CIRIA\]](#)
- [South East Lead Local Flood Authorities 'Water, People, Places'](#)
- ['RSPB/WWT 'Sustainable Drainage Systems - Maximising the potential for people and wildlife. A guide for local authorities and developers.'](#)

- 10.61. To meet the requirements of the national non-technical statutory standards for SuDS, peak runoff rates discharged from a development for the 1 in 1 year, 1 in 30 year and 1 in 100 year rainfall events must not exceed the peak greenfield runoff rate from the site for the same event. For brownfield sites, peak runoff rates must remain as close to greenfield runoff rates as possible, and not exceed the pre-development rate of discharge. The volume of surface water discharged from the development site must also be closely managed, and not exceed the greenfield runoff volume for the 1 in 100 year, 6 hour rainfall event.
- 10.62. SuDS are required regardless of pre-existing risk. The requirement is therefore in addition to the requirement to address existing areas of flood risk on-site, as set out in national guidance and Core Strategy policy.
- 10.63. As well as providing effective drainage solutions, SuDS can be designed and implemented in ways that deliver other Local Plan objectives, such as:
- the provision of habitats and support for biodiversity;
 - reinforcing local landscape character and the design of the development itself;
 - provision of open space/recreation;
 - promotion of water use efficiency and quality; and
 - reducing risks of land instability.
- 10.64. The type of SuDS approach that can be best utilised should have regard to all relevant factors (flood risk, compatibility for infiltration, groundwater, runoff characteristics, ground stability, topography, soils, geology, contamination issues, existing infrastructure, archaeology) as well as the potential for wider benefits. CIRIA's SuDS Manual C753, the latest guidance from the lead local flood authority, including any relevant Local Flood Risk Management Strategy and related guidance will be key references.

- 10.65. Ground conditions will often dictate the appropriateness of SuDS techniques and a ground investigation is likely to be required to assess the suitability of using infiltration measures and assessing the required volume of on-site storage required.
- 10.66. Where relevant, all watercourses, including 'ordinary watercourses', should be retained as an open feature within a designated corridor, where possible, ideally as open space, within any drainage strategy design. Developers should consider the potential flood risk arising from them, including in circumstances where no flood mapping currently exists. Any proposals to alter or divert an ordinary watercourse will require consent from the LLFA.
- 10.67. Applicants should submit sufficient information to enable proper consideration of drainage proposals. For major schemes, seeking pre-application advice from the LLFA is strongly recommended as is, for minor development, reference to its ['SuDS Decision Support Tool for Small Scale Development'](#). Proposals should also demonstrate that maintenance measures will be in place for the lifetime of the development. This may be secured by a legal agreement.
- 10.68. The Fairlight/Pett Level area has been recognised as an area of drainage concern. There are both issues of flooding in the Cliff End area and, in Fairlight Cove, issues of ground water affecting land stability and cliff erosion. A specific policy is put forward in the Land Stability section which restricts the use of soakaways in a zone near the cliff face, as well as limiting run-off in the wider catchment.
- 10.69. Core Strategy Policy SRM2 part (iii) requires SuDS for all development that creates impermeable surfaces in the Pevensey Levels hydrological catchment area – see Figure 3 below. This was derived from the Pevensey Levels Habitats Regulations Assessment which recommended further assessment work to include 'The identification of appropriate SuDS techniques to mitigate surface water and water quality concerns'. Further Habitats Regulations Assessment (HRA) work in support of the DASA recommends a minimum of two types/stages of SuDS treatment within the catchment, in order to address possible negative effects from surface run-off and hydrological pathways. As set out in the DASA HRA, SuDS selection should be in accordance with 'Water, People, Places'¹, which advises on appropriate techniques to prevent runoff from reducing the quality of a receiving body of water.

1 South East Lead Local Flood Authorities 'Water, People, Places'

Figure 10. Pevensey Levels Hydrological Catchment Area



Scale: 1:75000

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- 10.70. Analysis of the 'Review of Consents' for the Pevensey Levels suggests that the essential issue affecting water quality is insufficient water levels within the internationally protected wetland site under the Ramsar Convention (Ramsar) and consequent failure to replenish supporting ditches with negative impact on ecology. Therefore, rather the emphasis should be on implementing SuDS with several stages of the treatment train in order remove pollutants and sediments effectively. This approach is supported by both the Environment Agency and Natural England.
- 10.71. More generally, the East Sussex Local Flood Risk Management Strategy (LFRMS) subdivides the county into one of four 'Drainage Areas', each with their own characteristics based upon the different ground conditions present and their ability to drain surface water. Of particular note, 'Drainage Area 2' is characterised by areas of steep relief causing high velocities of surface water run-off and ponding in low points. The FRMS notes that for this spatial area, 'Improvement upon greenfield runoff rates from the site should be discussed with the LLFA, to minimise the downstream surface water flood risk.' The standing advice in the LFRMS, tailored to the characteristics of the area, which should be used to inform drainage strategies as part of new developments. However, it does not replace any site specific assessment.
- 10.72. The County Council has also produced Surface Water Management Plans for Bexhill, Battle and Rye, which identify flood risk that arises from local flooding from surface runoff, groundwater, and ordinary watercourses. Where development is proposed within or close to identified 'flooding priority areas' and 'hotspots' in these plans, consultation with the LLFA is recommended, which may advise on a case by case basis.

Policy options:

Consideration has been given to whether it would be appropriate to either highlight the need to prioritise sustainable drainage in line with the NPPF and otherwise ensure adequate drainage (Option A) or whether drainage warrants further attention in response to local conditions, including regard to flows into ecologically sensitive areas. (Option B).

A Sustainability Appraisal of these finds that Option B has some advantages, notably in relation to nature conservation objectives, but also albeit to a lesser degree, in relation to flood risk and recreation/amenities. Hence, this option is preferred. The proposed policy wording is set out below.

Policy DEN5: Sustainable Drainage

Drainage should be considered as an integral part of the development design process, with Sustainable Drainage Systems (SuDS) utilised unless demonstrated to be inappropriate. In particular:

- (i) peak run-off rates from development should remain as close to greenfield runoff rates as possible, and not exceed the existing rate/volume of discharge as a minimum;
- (ii) new development should utilise opportunities to reduce the causes and impacts of all sources of flooding, ensuring flood risks are not be increased elsewhere and that surface water run-off is managed as close to its source as possible;
- (iii) drainage should be designed and implemented having regard to the latest East Sussex Local Flood Risk Management Strategy (LFRMS) and related guidance;
- (iv) SuDS should be designed and implemented to be 'multi-functional' and deliver other Local Plan policy objectives;
- (v) applicants should demonstrate that arrangements are in place for on-going maintenance of SuDs over the lifetime of the development;
- (vi) within the Pevensey Levels Hydrological Catchment Area, SuDS designs should incorporate at least two stages of suitable treatment, unless demonstrably inappropriate; and
- (vii) within the Pett Level catchment, drainage proposals should accord with Policy DEN5 in the Land Stability section.

QUESTION 21: Do you agree with the policy approach to sustainable drainage and the proposed policy wording?

Land stability

- 10.73. Issues of land stability and subsidence have a raised profile in recent years, generally associated with increasing climate change. At the same time, they can be linked to local ground conditions, flood events and the legacy of former land filling or mining.
- 10.74. The National Planning Policy Framework (NPPF) looks to the planning system to play its part in ensuring that sites are suitable for their new use taking account of ground conditions and land instability¹ Supporting Planning Practice Guidance states that planning authorities may need to consider identifying areas where particular consideration of such risks is needed, potentially limiting development in those areas or ensuring that there is appropriate land remediation or mitigation. In specific circumstances may even warrant the removal of permitted development rights².
- 10.75. Core Strategy Policy OSS3 already requires that issues of land stability, along with contamination, air quality, agricultural land quality and coastal erosion, are considered in assessing both the suitability of land for development and in determining the details of schemes.
- 10.76. Useful information on 'natural ground stability', such as may be due to shrink-swell, landslides, running sands, soluble rocks, compressible ground or collapsible ground, can be obtained from the British Geological Survey³.
- 10.77. Developers may be required to demonstrate they have investigated risks and where there is likelihood of instability, a full land instability risk assessment report is expected to be submitted with a planning application. This should be undertaken by a suitably qualified professional and should demonstrate the degree of instability, appropriate measures to mitigate those risks, and an implementation and future monitoring plan.
- 10.78. Consideration will be given to whether the proposed development, taking account of pre-existing land stability, should proceed. Regard will be given to the impact of proposed drainage on ground stability, as well as of any mitigation, such as retaining walls. All works should be both effective and environmentally acceptable. Building Regulations will address the detailed design of buildings and their foundations.
- 10.79. Locally, the greatest issues of land stability are at Fairlight, where there have been long-standing issues of coastal erosion. These are considered further below. Elsewhere, land stability issues have affected parts of South Undercliff and Military Road, Rye.

¹ NPPF, Paragraph 121

² PPG Paragraph 003 Reference ID: 45-003-20140306

³ BGS can produce a site-specific 'Natural Ground Stability Report' which briefly describes any natural ground stability hazards if they are present.

Coastal erosion – Fairlight

- 10.80. The District Council is the 'Coastal Risk Management Authority' and has long recognised the specific problems of coastal erosion at Fairlight Cove. Measures have been undertaken to manage this through the construction in 1990 of a rock bund at the sea edge below Sea Road and, in 2007, the construction of a Rock bund below Rockmead Road, together with slope grading and the installation of slope drainage and deep well pumps in 2007, designed to operate for 50 years, consistent with the 'Hold the Line' policy of the Shoreline Management Plan (SMP). A further bund linking these has been approved and is due to be in place later in 2016.
- 10.81. However, while these engineering works control erosion and land loss, they do not prevent it, which is also affected by the variable quality of the ground and the impact of ground water. Despite a number of studies of the source of water, the complexity of the geology makes it very difficult to come to clear conclusions.
- 10.82. At the time of the Local Plan 2006 it was found that 'Close to the cliff edge at Fairlight Cove, the land is likely to be affected by erosion or land instability. Where this is likely to occur during the lifetime of the building a precautionary policy is necessary.' Notwithstanding that there have been significant defence works since that time, which have clearly helped in terms of the rate of erosion and land stability, it still seems prudent to limit development that may have an effect on the loading near the cliff or on the flow of water in the ground near the cliff edge.
- 10.83. The situation is further complicated, if not aggravated, by the lack of a surface water drainage system at Fairlight. While there appears to be some scope to connect to the foul system (but not the highway system), care needs to be taken in relation to further discharge into the Lower Waites Lane sewer. There is also a wider concern about surface water drainage both in the village and downstream in the Pett Level.
- 10.84. A report by the East Kent Engineering Partnership in 2015⁴ recommends that "sensible measures need to be put in place to restrict development near to the cliff top via set back lines and not permit soakaway drainage within 50m of the cliff face. The limit of development should be reviewed every 10 years or so and should be part of Planning Policy.'
- 10.85. Hence, it is regarded as good practice to define a coastal zone in line with the above-mentioned Report (which also approximates to the earlier SMP erosion line) within which neither soakaways nor development that would add to the loading will be permitted (see Figure 11 below). To complement this, it is also proposed to require the rate of run-off from sites in the catchment of Pett Level, including Fairlight, (see Figure 12 below) to the greenfield rate, in both flow and volume.

Figure 11: Fairlight Coastal Zone Buffer

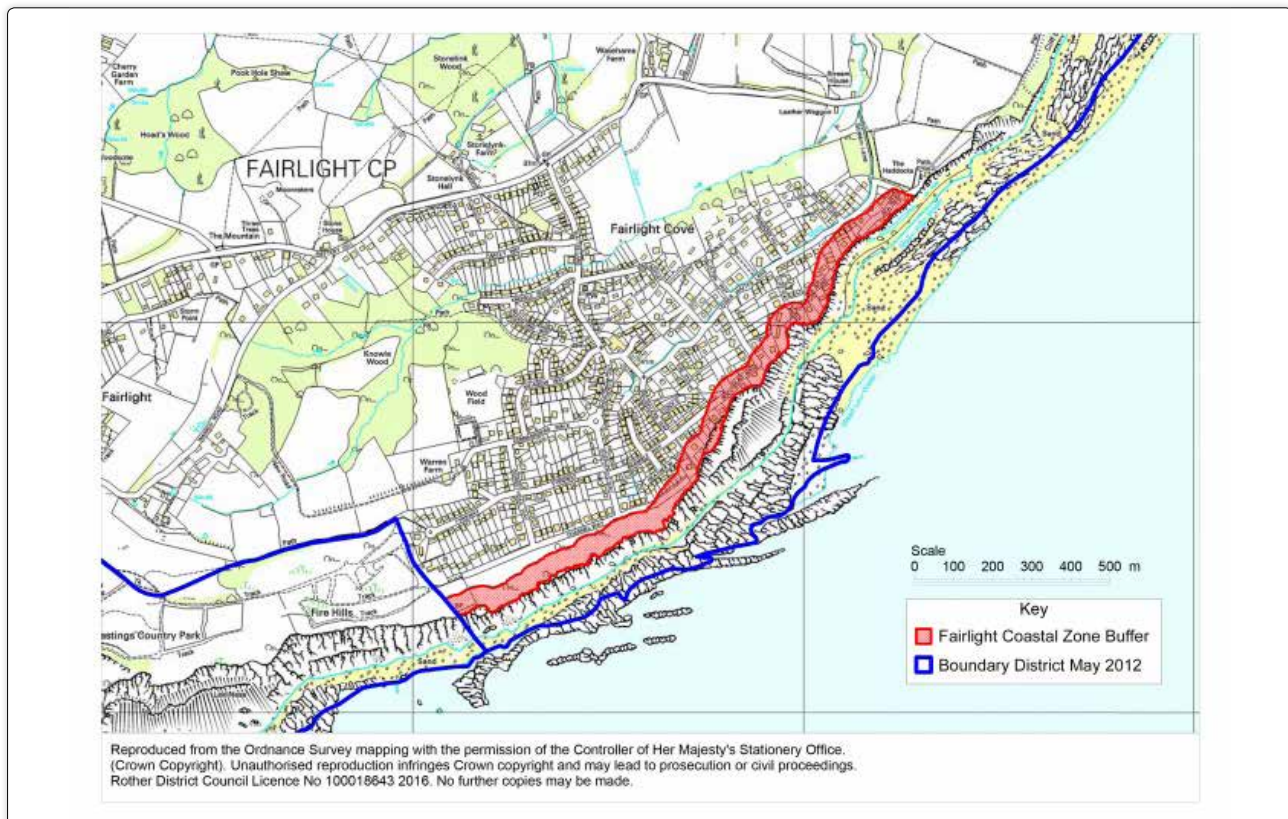
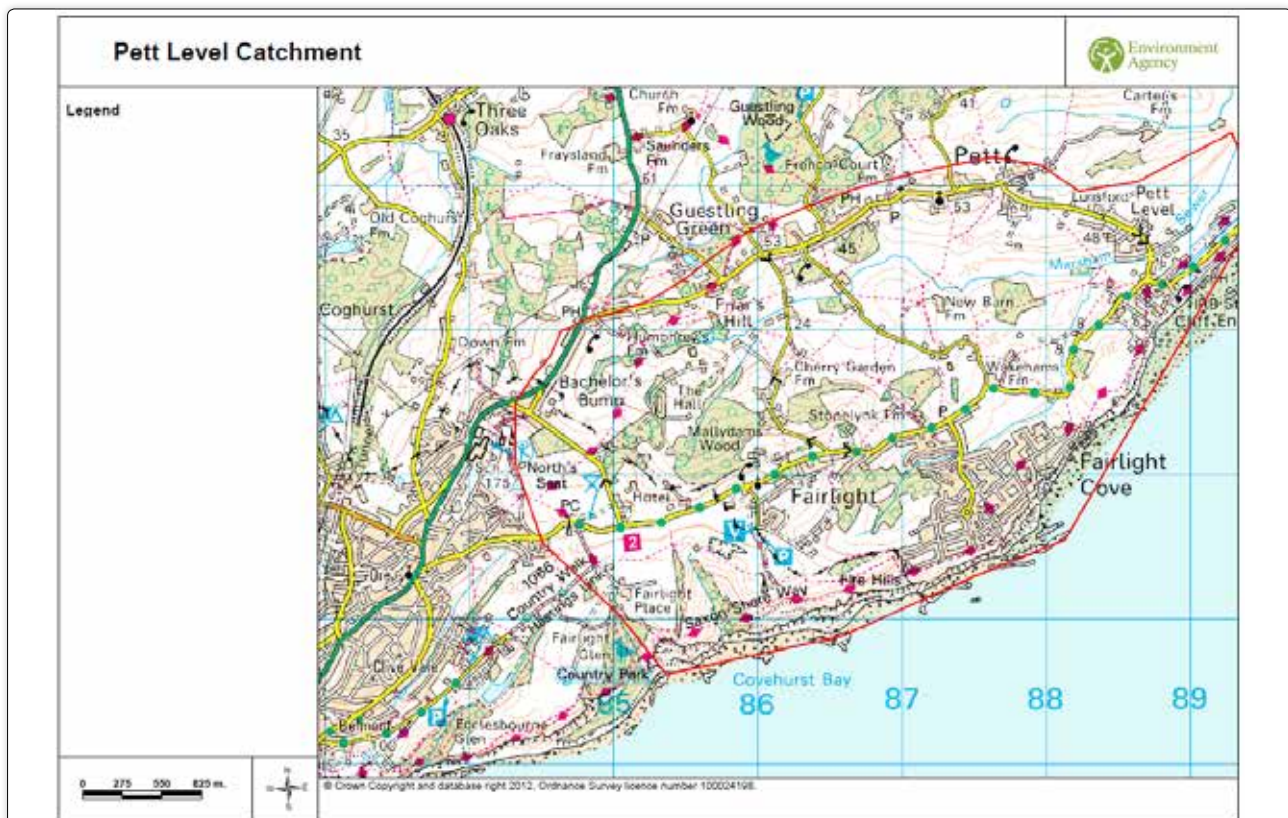


Figure 12: Pett Level Catchment Area



- 10.86. A structural engineer's survey and geo-technical report will be required for new development in the coastal zone to demonstrate that there would be no increase in ground loading.
- 10.87. The definition of the development boundary for Fairlight is now a matter for the Fairlight Neighbourhood Plan, but the Parish Council may also consider drawing it back to exclude the coastal zone shown on Figure 7.

Policy options:

The fundamental policy options considered through the Sustainability Appraisal are, firstly, whether a specific land stability policy applicable across the District is needed and, secondly, whether a policy specific to the Fairlight/Pett area is needed. This concludes that both are appropriate given both the general and specific risks relating to potential ground on social and environmental objectives.

Furthermore, information available from the British Geological Survey highlights a range of potential land stability issues across the District, while coastal erosion and landslip is a significant issue at Fairlight Cove and the subject of specific studies and ongoing mitigation measures. Also, there are concerns about the drainage system locally. While the appropriate extent of a restriction on soakaways near the cliff edge is based on the current position, it is noted that this zone would need to be redefined, and rolled back, in the event of a significant landslip.

It is noted that a neighbourhood plan is in preparation for Fairlight Parish, which may further address local issues. However, coastal erosion is regarded as a strategic issue, while flood risk extends across a broader area, warranting policy coverage in this plan.

Policy DEN6: Land Stability

Development will only be permitted on unstable or potentially unstable land, including former landfill sites and coastal margins, where:

- (a) the nature of the instability has been properly assessed; and
- (b) any remedial measures required to ensure that the development does not add to the instability of the site or surrounding land are environmentally acceptable and normally implemented prior to the commencement of building works.

In the Fairlight/Pett area:

- (i) soakaway drains will not be permitted within a coastal zone within 50 metres of the cliff face at Fairlight Cove, as shown on Figure 11; and
- (ii) elsewhere within the catchment of Pett Level, as shown on Figure 12, surface water run-off from development shall be no more than the greenfield rate, in terms of volume and flow.

QUESTION 22: Do you agree with the policy approach to land stability and the proposed policy wording?

Environmental pollution

- 10.88. As noted earlier, Rother is a largely rural district with over 80% of the land lying within the High Weald Area of Outstanding Natural Beauty (AONB). As well as the three towns with their bustling town centres and employment areas, there are also large and small villages, quieter residential neighbourhoods and more tranquil countryside areas.
- 10.89. While environmental pollution issues will vary depending on the location and type of development involved, in all cases it will be appropriate to consider the effect of proposals in terms of their potential to create pollution through lighting, noise, odour, hazardous and non-hazardous substances and/or airborne particulates. The general approach is to ensure that such impacts of new development are properly assessed at an early stage to keep their effects to a minimum.
- 10.90. Other legislation, notably The Clean Neighbourhoods and Environment Act 2005 makes noise, odour and light nuisance the subject of criminal law. At the same time, planning can play a complementary role. Local Plan Core Strategy policies seek to protect amenity and the character of an area and also to support economic growth. In this context, it is important that all development has regard to their potential impacts on the noise environment, on dark skies, where these prevail and on air quality.

Noise

- 10.91. Many developments have the potential to affect the acoustic environment. They may involve the introduction of new noise sources, or new noise-sensitive developments near existing noise sources. It is necessary for the Council to carefully manage development to ensure that noise does not give rise to unacceptable adverse effects on health and quality of life, or on the character of areas.
- 10.92. The National Planning Policy Framework (NPPF), at paragraph 123, states that planning policies and decisions should aim to avoid noise from giving rise to significant adverse impacts¹ on health and quality of life as a result of new development and reduce impacts to a minimum. At the same time, development, including existing businesses, will often create some noise and should not have unreasonable restrictions put on them. Further details of possible mitigation measures are contained within the Government's [Planning Practice Guidance](#).

1 With reference to the Explanatory Note to the Noise Policy Statement for England (DEFRA)

- 10.93. Local noise guidance has been prepared by the Sussex Air Quality Partnership and adopted by councils in the county. This document, entitled [Planning Noise Advice Document: Sussex](#), provides detailed guidance for developers on the preparation of noise reports and also mitigation measures. The Council normally require technical information to be provided with planning applications in the form of a 'Noise Impact Assessment'.² Where new noise-generating development or noise-sensitive development is proposed or for plant installation. These should be prepared by suitably qualified acousticians.
- 10.94. General guidance to local residents on issues of noise can be found on the Council's website at <http://www.rother.gov.uk/article/195/noise>

Lighting

- 10.95. Artificial light can be an essential aid to safety, can facilitate a thriving night-time economy and increase the period of the day and evening when sport and leisure facilities are available to use. Well-designed lighting can highlight architecturally or culturally significant buildings and features, creating visual interest and instil a sense of civic pride. However when poorly located, designed, maintained or otherwise used incorrectly, artificial light can impact on people's health, wildlife behaviours and safety, result is a waste of energy, distract road users and affect the character and amenities of places, both in built-up areas and the countryside.
- 10.96. The Campaign to Protect Rural England (CPRE) has estimated that between 1993 and 2000 alone the amount of light pollution across England increased by 24% and the amount of truly dark sky dropped from around one sixth of the country to just over one tenth. East Sussex has remained relatively dark in comparison with more developed areas, although the amount of general light pollution nevertheless increased significantly so that by 2000 only 13% of the sky fell within the two darkest categories compared with 29% in 1993. At a district level, dark night skies are a valued characteristic of the district's countryside and contribute in particular to the special landscape qualities and natural beauty of the High Weald Area of Outstanding Natural Beauty.
- 10.97. Common sources of potential light pollution include sports grounds (e.g. equestrian uses, golf driving ranges, tennis courts, football pitches, multi-use games areas), quarries and other industrial, commercial and retail areas, street lighting and illuminated signage. Nationally, approximately half of all complaints regarding light nuisance arise from domestic external security lighting. These are not subject to planning control, while operational lighting for roads, etc. benefits from permitted development rights. Illuminated advertisements, which generally require consent, are dealt with in Chapter 9.

2 See the Council's Planning Validation Checklist

- 10.98. The national objective to limit the impact of light pollution from artificial light is set out in the NPPF at paragraph 125. Applying those principles and related national guidance to local circumstances, proposals should consider:
- the need for the lighting, its duration, intensity and direction;
 - the impact of light levels outside the development;
 - the effect on the use or enjoyment of nearby buildings or open spaces;
 - the impact on a protected site or species³; and
 - whether the development is in an intrinsically dark landscape where it may be desirable to minimise new light sources.
- 10.99. The 2006 Local Plan sets out that, in respect of external lighting, regard is to be had to its impact on the character and appearance of the surroundings, to include the avoidance of unnecessary light spillage into the surrounding area and into the night sky. (Paragraph 5.19)
- 10.100. The '[Guidance Notes for the Reduction of obtrusive Light' GN01:2011](#) Institute of Lighting Professionals (ILP) 2011 provides a useful framework for considering the impact of lighting. It defines a typology of “environmental zones” that may be applied to Rother District as below:
- E1: the Pevensey Levels and the Dungeness Complex of international nature conservation sites, the High Weald AONB outside of towns and villages⁴;
 - E2: within settlements and elsewhere outside areas in E1 and E3; and
 - E3: within Bexhill and the town centres of Battle and Rye
- 10.101. For larger developments involving outdoor lighting or those developments in or adjacent to sensitive locations, the Council may require a full lighting strategy to be submitted prepared by a qualified lighting engineer.
- 10.102. Where planning permission is granted, appropriate conditions will normally be attached to control the lighting scheme including for example: specification of lighting type, height, angle etc.; hours of operation; retention of screening vegetation; use of new planting or bunding; details of a future scheme of maintenance and post installation checks.

Air pollution/particulates

- 10.103. No part of Rother District is defined as an 'Air Quality Management Area'; hence, there is no expectation of focused planning policies to address air pollution. Also, there is a separate statutory framework for consideration of the level of airborne pollutants. Nonetheless, it may be appropriate for appropriate mitigation measures to be incorporated into planning permissions for certain developments.

3 See Defra and Natural England websites on handling the impact on wildlife – including from artificial light – where European protected sites or European protected species could be affected.

4 As defined by settlement development boundaries

Hazardous substances

- 10.104. Sometimes pre-existing sources of pollution or specific hazards need to be taken into account by development proposals. Key factors are the distance, risks and nature of the proposal. In these cases, the Health and Safety Executive (HSE) are able to advise potential applicants about these. The Council will use the advice of the HSE in its decision making process, including where applications are near “notifiable installations”, such as high pressure gas mains and overhead power cables.
- 10.105. Any site that needs to use or store hazardous substances, requires hazardous substances consent (HSC) before it can operate. Further advice is available at: <http://planningguidance.planningportal.gov.uk/blog/guidance/hazardous-substances/>

Policy options:

There is no specific reference to external lighting within the Core Strategy.

Two options have been considered and subject to Sustainability Appraisal:

Option A: Rely on national and local guidance.

Option B: New policy, drawing on local guidance and information.

Option B is found to offer several, mainly environmental as well as health benefits, and no obvious dis-benefits. Hence, this approach is preferred and the proposed policy wording is set out below.

Policy DEN7: Environmental Pollution

Planning permission for development will only be permitted where it is demonstrated that there will be no significant adverse impacts on health, local amenities or environmental character as a result of lighting, noise, odour, hazardous and non-hazardous substances and/or airborne particulates associated with development. In particular:

- (i) in relation to noise, consideration will be also given to the character of the location, established land uses and any cumulative effects; also, in the case of new noise-sensitive development, users of the new development should not be likely to experience unacceptable adverse effects resulting from existing levels of noise; and
- (ii) in relation to lighting, is necessary and the minimum required, is designed to minimise light pollution, including light glare and sky glow, and to conserve energy, through the use of best available technology and has regard to the lighting levels recommended by the Institute of Lighting Professions (ILP) for the relevant environmental zone identified at paragraph 13.

QUESTION 23: Do you agree with the policy approach to managing environmental pollution through the planning process and with the proposed policy wording?

11. Implementation

Comprehensive development

- 11.1. The NPPF (paragraphs 7, 8 and 152) underlines the three roles of the planning system, highlighting that in order to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously.
- 11.2. Securing such gains should draw upon the extensive evidence base that identifies local needs for different uses and services at the settlement and site level for the benefit of the community. Core Strategy Policy OSS4 states in part (iv) that development should be 'compatible with both the existing and planned use of adjacent land'.
- 11.3. This may involve bringing together land in different ownerships to ensure that the range of needs are met effectively within a logical overall area or it may involve bringing together a mix of uses for an appropriate and sustainable approach to site development (for example commercial, community or recreational uses in addition to residential development). Mixed use developments are promoted in the NPPF at paragraph 17 and reinforced in relation to character and quality of places at paragraphs 58 and 64.
- 11.4. Hence, where a site comprises separate land ownerships, the expectation is that developers and land owners should work positively together to achieve wider goals of sustainable development and the full benefits to the local community. The need to demonstrate that proposals will secure the provision of infrastructure to serve a whole site, which was formerly required by Policy GD2 of the 2006 Local Plan, is carried forward by this new policy. Reference is also made to the Core Strategy Policy LHN2 'Note' relating to treating a site as a whole for the purposes of delivering affordable housing.
- 11.5. The approach to land-use mix should ensure the overall viability of proposals, while also ensuring that socially, economically and/or environmentally important elements that will typically be less commercially attractive should not be considered separately or in isolation but effectively cross-funded by residential elements other uses to enable the delivery of development that is sustainable and acceptable in planning terms.

Policy options:

Option A: New policy that draws together the related elements of the NPPF, Core Strategy and former 2006 Local Plan.

Option B: No further policy but rely on existing national and Core Strategy policies, notably IM2,IM3,TR2,EN5.

Option A makes explicit in development plan policy and in a way that can be readily applied in Development Management, the clear expectation that, where different land interests exist, they must cooperate to achieve sustainable development.

Option B seeks to achieve similar ends by drawing on existing policy statements. However, without a specific, unambiguous policy, there is more likelihood of incremental developments that fail to realise the full potential of a site for sustainable development and may even frustrate the full development of suitable sites.

The SA/SEA of these options also shows that a new policy offers a number of advantages in terms of the ability to achieve sustainable development through scope for securing better provision of community, environmental and economic infrastructure.

Option A is the preferred policy approach. The proposed policy wording is set out below.

Policy DIM1: Comprehensive Development

Comprehensive proposals for the development of sites will normally be required, including where sites are in multiple ownerships.

In exceptional circumstances, proposals for part of a site may be permitted, but only where it demonstrably has regard to, and facilitates, an integrated scheme for development of the entire site. This will include the provision of appropriate uses, affordable housing, green space/open space and other infrastructure (including sustainable drainage), taking account of the site as a whole.

QUESTION 24: Do you agree with the policy approach to comprehensive development and the proposed policy wording?

Development boundaries

- 11.6. Development boundaries differentiate between the substantially built-up areas of towns and villages, where further development, including redevelopment or intensification, would be acceptable in principle, and the countryside (i.e. outside development boundaries) where it would not. Development boundaries both positively focus growth on sustainable settlements and help to protect the surrounding countryside from unnecessary and intrusive development.
- 11.7. The principle of the continued use of 'development boundaries' around settlements, has been reaffirmed by Core Strategy Policy OSS2, as reproduced below:

Core Strategy Policy OSS2: Use of Development Boundaries

Development Boundaries around settlements will continue to differentiate between areas where most forms of new development would be acceptable and where they would not.

Existing development boundaries will be reviewed by the Development and Site Allocations DPD, having regard to the:

- (i) existing pattern, form and function of settlements, including of closely 'linked' settlements and important 'gaps' of countryside between them;***
- (ii) character and settings of individual towns and villages;***
- (iii) sensitivity to further development both within the main built up confines and in more rural fringes;***
- (iv) the amount of land needed to fulfil development needs and requirements;***
- (v) availability of local infrastructure and services;***
- (vi) accessibility to facilities and services, and avoiding scattered and ribbon development;***
- (vii) environmental considerations, including the need to conserve designated areas of national and local landscape, archaeological, geological, ecological or historical importance; and***
- (viii) following physical features, unless this may suggest a potential for development that is inappropriate.***

- 11.8. This policy also commits to review the development boundaries around settlements as currently defined in the Rother District Local Plan 2006, having regard to the factors set out. Proposed updated boundaries, which also take account of proposed new site allocations, are presented in Part C of this consultation document.
- 11.9. The supporting text to Policy OSS2 clarifies that ‘within development boundaries there is a presumption that infilling, redevelopment and changes of use will be acceptable subject to other policies of the plan.’ At the same time, proposals within development boundaries are still subject to a number of other policies to ensure that it does not adversely impact on other interests of acknowledged importance.
- 11.10. While land outside development boundaries is regarded as ‘countryside’ for planning policy purposes, this is not an absolute restriction on development. The potential for development outside development boundaries to support vital rural communities and also conserve or enhance its intrinsic qualities is recognised. There are specific policies to promote a sustainable rural economy, including farming, tourism and meet recognised local needs for facilities or affordable housing.
- 11.11. As the criteria in Policy OSS2 imply, development boundaries are policy lines; they do not seek to define settlements as such. As with existing development boundaries, there may be fringe areas of settlements, as well as some smaller settlements and enclaves of development in the countryside that are excluded in order to maintain the overall rural character of the locality. While they will normally follow physical boundaries, on occasion, the full depth of property curtilages may be excluded to make clear a policy statement that backland or in-depth development is unacceptable, often because of its additional visual or amenity impact.
- 11.12. It is proposed to carry forward the essence of the existing key 2006 Local Plan policies that cover the application of development boundaries, namely policies DS3 and DS4. Policy DS3 states that ‘The existing settlement pattern will be maintained. The majority of all new development will take place within the development boundaries of existing towns and villages set out below, as defined on the Proposals Map.’ while Policy DS4 sets out the limited circumstances in which development would be allowed outside development boundaries, with a requirement to demonstrate that a countryside location is necessary for a particular development that falls outside the specific exceptions.
- 11.13. Regard is also had to the NPPF which states (in paragraph 17) that planning should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable at the same time highlighting the need to recognise ‘the intrinsic character and beauty of the countryside’. In relation to housing, paragraph 55 says ‘Local planning authorities should avoid new isolated homes in the countryside unless there are special circumstances such as: ...’

- 11.14. The substantial AONB coverage of the District is a further key justification for carefully managing development in the countryside.

Policy options:

Option A: **New policy** that clarifies, in policy terms, the use of development boundaries in development management.

Option B: **No further policy** but rely on general principles implied in Core Strategy policy OSS2 and referred to in its supporting text.

The relationship of a site to the relevant development boundary is a major factor in the determination of many applications; hence, it is evident that a specific development management policy, as proposed under Option A, which complements the broad statement of principle in the Core Strategy, is called for.

Option B, to rely on Core Strategy policies, would mean that, while proposals for specific forms of development could be determined with reference to related policies, such as RA3 and RA4 in relation to housing in the countryside, there would be a policy void in setting out the overall implications of the development boundaries and these policies lack a definition of 'countryside' for development management purposes. The SA/SEA of these options also shows that the development of a policy that elaborates upon existing policies offers the prospect of greater environmental benefits, notably in terms of conserving countryside character, as well as in focusing development in places with higher access to services.

Hence, **Option A is the preferred policy approach.**

The proposed form of the policy, which maintains the existing approach to development in the countryside, is set out below.

Policy DIM2: Development Boundaries

The development boundaries of settlements, defined in accordance with Core Strategy Policy OSS2, are shown on the Policies Map.¹

New development shall be focused within defined settlement development boundaries, principally on already committed² and allocated sites, together with other sites where proposals accord with relevant Local Plan policies.

In the countryside (that is, outside of defined settlement development boundaries), development shall be normally limited to that which accords with specific Local Plan policies or that for which a countryside location is demonstrated to be necessary.

¹ Towns and villages with development boundaries are listed in Figure 13.

² That is, sites with planning permission (or resolution to grant permission subject to a legal agreement) as identified in the Local Plan Monitoring Report.

QUESTION 25: Do you agree with the proposed policy wording on development boundaries?

Figure 13. Settlements with Development Boundaries

Settlements with Development Boundaries in this Plan	Settlements with Development Boundaries in Neighbourhood Plans
Bexhill	Battle
Hastings Fringes	Rye
Beckley Four Oaks	Burwash
Brede and Cackle Street	Burwash Common
Broad Oak	Burwash Weald
Camber	Crowhurst
Catsfield	Etchingham
Guestling Green	Fairlight Cove
Hurst Green	Flimwell
Icklesham	Netherfield
Iden	Robertsbridge
Northiam	Sedlescombe
Peasmarsh	Stonegate
Pett and Friar's Hill	Ticehurst
Rye Harbour	
Staplecross	
Three Oaks	
Westfield	
Winchelsea	

Part C: Site Allocations

12. Overview

Development targets
Sources of supply and consideration of options
Overview of allocations

13. Bexhill

14. Hastings Fringes

15. Villages with site allocations

Beckley Four Oaks
Broad Oak
Camber
Catsfield
Hurst Green
Iden
Northiam
Peasmarsh
Rye Harbour
Westfield

16. Other villages with development boundaries in the 2006 Local Plan

Brede and Cackle Street
Guestling Green
Icklesham
Norman's Bay
Pett and Friar's Hill
Pett Level
Staplecross
Three Oaks
Winchelsea
Winchelsea Beach

17. Other policies

Gypsies and Travellers
Guestling Green - Land at former highway depot
Marley Lane - Land at Felon's Field
Rother Valley Railway

12. Overview

Development targets

- 12.1. The adopted Core Strategy's targets for the numbers of additional homes and business floorspace over the plan period (2011-2028) are set out in the respective policies for each locality and summarised in Figure 8, which is reproduced below.

	Approximate development levels 2011-2028	
	Housing	Employment
Bexhill	3,100 dwellings	At least 60,000sqm.
Hastings fringes	100-250 dwellings	At least 3,000sqm.
Battle	475-500 dwellings	At least 10,000sqm.*
Rye	355-400 dwellings	At least 10,000-20,000sqm.
Villages	1,670 dwellings	At least 10,000sqm.
Total	At least 5,700 dwellings	At least 93,000 – 103,000sqm.

* includes sites on Marley Lane

- 12.2. The distribution of dwellings between villages in the rural areas is set out in Core Strategy Policy RA1 and Figure 12. This identifies the number of dwellings that are anticipated from new sites, taking account of completions between 2011 and 2013, outstanding planning permissions and allocations in the earlier 2006 Local Plan that do still not have planning permission.
- 12.3. In line with national policy guidance, existing sites allocations that have not been carried forward by a planning permission are reviewed as part of the review of options to meet the residual requirement.
- 12.4. Figure 14 below identifies the residual requirement for additional homes on new sites of 6+ dwellings in each of the towns as at 1st April 2016.

Figure 14. Residual requirement for additional homes on new sites of 6+ dwellings

Settlement/ Area	Total	Completions over plan period	Large site commitments	Small site commitments	Small site windfalls	Residual requirements
Battle	475	20	0	9	21	425
Bexhill	3,100	318	1,588	43	107	1,044
Hastings Fringes	100	8	78	0	1	13
Rye & Rye Harbour	355	198	22	6	22	107

Overview

Development targets

- 12.5. The table below presents similar information for villages covered by this plan where there is a housing target from new sites (shown in **bold**) and the nine villages for which neighbourhood plans are being prepared. It covers larger sites (of 6+ dwellings) as there is a separate small sites allowance applied across the whole Rural Area.

Figure 15. Large site housing requirements for villages as at 1st April 2016

Settlement/Area	Parish	Large site requirement	Large site completions 13-16	Large site permissions	Residual requirements
Beckley Four Oaks	Beckley	26	6	0	20
Broad Oak	Brede	50	0	0	50
Burwash	Burwash	52	0	17	35
Camber	Camber	40	20	0	20
Catsfield	Catsfield	53	0	6	47
Crowhurst	Crowhurst	20	0	0	20
Etchingham	Etchingham	51	21	0	30
Fairlight Cove	Fairlight	37	0	0	37
Flimwell	Ticehurst	43	0	34	9
Hurst Green	Hurst Green	75	0	0	75
Iden	Iden	12	0	0	12
Netherfield	Battle	48	0	0	48
Northiam	Northiam	123	0	123	6¹
Peasmarsh	Peasmarsh	50	0	0	50
Robertsbridge	Salehurst and Robertsbridge	147	0	17	130
Rye Harbour	Rye	40	0	0	40
Sedlescombe	Sedlescombe	49	8	0	35 ²
Staplecross	Ewhurst	25	0	25	0
Ticehurst	Ticehurst	87	21	40	26 ³
Westfield	Westfield	89	0	39	50
Totals		1117	76	301	740

- 1) This figure for Northiam reflects the fact that a site with planning permission for 58 units is a specialised scheme which is not progressing. 52 units is regarded as a more achievable form of development; hence, the balance of 6 dwellings
- 2) The residual requirement for Sedlescombe is reduced to reflect an expired planning permission which is still expected to come forward.
- 3) It is noted that the residual requirement for Ticehurst is reduced to zero following a subsequent approval for 30 dwellings at Hillbury Field subject to a legal agreement in April 2016.

- 12.6. Sites for at least 740 dwellings need to be identified in villages through the DaSA Local Plan and Neighbourhood Plans, of which this Plan should identify at least 370 dwellings.
- 12.7. The figures in this table will provide the baseline for assessing conformity with the Core Strategy in terms of the numbers of dwellings being put forward on housing sites in villages through neighbourhood plans.
- 12.8. In interpreting these requirements when identifying the potential for further development, attention is drawn to the Villages section of the Core Strategy, which states that 'Previously unidentified large sites (6 dwellings and over) in a village gaining planning permission before adoption of the relevant Plan may be deducted from the total 'Potential new sites' that an individual village is expected to achieve, depending on the stage reached and the suitability of other potential sites.'
- 12.9. The essence of this statement is that plans should not dismiss sustainable sites simply because other sites have come forward that mean that development targets can be met without it. At the same time, it is appropriate to have regard to the general scale of development in a settlement relative to its overall sustainability and status in the settlement hierarchy, as well as to have proper regard to the individual merits, and demerits, of sites.

Sources of supply and consideration of options

- 12.10. Development interests have suggested a substantial number of possible development sites to be considered. These have been received over the course of preparing the DASA, the Core Strategy and supporting evidence. In addition, the Council has thoroughly investigated a significant number of sites identified via other sources, including identification by Council officers themselves. The 'other sources' have been explained in more detail in supporting evidence¹.
- 12.11. A summary of the process by which options and preferred options have been identified and considered (including via Sustainability Appraisal) is set out in the supporting background paper 'Site Assessment Methodologies' (see separate background Paper).
- 12.12. The process for considering the suitability and capacity of both existing and potential further business sites is set out in the 'Employment Sites Review' Background Paper.

¹ As detailed in supporting evidence, including the 'Strategic Housing Land Availability Assessment' (SHLAA) 2013 (paragraphs 3.2 to 3.10), as well as the Employment Land Review process and liaison with Parish Councils.

Overview of allocations

- 12.13. The proposed allocations for Bexhill, the Hastings Fringes and the villages covered by the DaSA will meet the respective requirements. Allocations for a couple of settlements are slightly greater, while Catsfield is a few dwellings under, but this properly reflects site circumstances.
- 12.14. Overall and subject to the ongoing Neighbourhood Plans meeting their minimum requirements for new homes, the preferred allocations would meet and, potentially, slightly exceed the minimum Core Strategy requirement. This is critical to ensuring that the 'soundness' of the plan will be supported at independent examination.
- 12.15. The proposed business allocations supplement sites with existing planning permissions, as well as the existing stock, to meet the Core Strategy's minimum quantitative requirements. As importantly, the allocations together with other Local Plan policies in support of the retention and improvement of business space, should meet the qualitative needs of businesses, including for inward investment.

13. Bexhill

Context

- 13.1. Bexhill is by far the largest settlement in Rother district, with a population of some 43,100 people (2011 Census) and is its administrative centre. It has a population equivalent to some 48% of that of the district as a whole. It is primarily residential in character with an established employment, shopping and service centre role. As such, the focus of development identified through the Core Strategy is within Bexhill.
- 13.2. The underlying environmental quality of the town is high. Key assets are the seafront, the internationally acclaimed De la Warr Pavilion, the well-preserved and mixed-use town centre and a variety of pleasant residential areas interspersed with substantial areas of parkland and open space.
- 13.3. The countryside setting of the town, although not part of the High Weald Area of Outstanding Natural Beauty, is also undulating and attractive. The area is rich in wildlife habitats. Parts of Combe Haven and High Woods are Sites of Special Scientific Interest. Beyond the western fringe are the Pevensey Levels, of international nature conservation importance.
- 13.4. The town centre maintains its role as the principal shopping area serving the town, even though a significant proportion of retail expenditure is “lost” to Ravenside Retail Park, Hastings and Eastbourne. Competition from other centres, allied to the physical constraints on development in the town centre and the fairly static spending power within the town, have combined to limit retail investment in recent years.
- 13.5. The amount of business accommodation is relatively low for the size of the town, with only Beeching Road and, to a lesser extent, Brett Drive and Elva Way forming recognised industrial estates.
- 13.6. Policy relating to the Combe Valley Countryside Park is covered within the Hastings Fringes Chapter.

Development Provisions

- 13.7. In view of its relative size, range of services and location outside any national landscape or nature conservation designations, the Core Strategy identifies Bexhill as the focus for development within the District. It sets a requirement of at least 3,100 dwellings over period 2011 to 2028, as well as at least 60,000sqm of new business floorspace within Bexhill.
- 13.8. In terms of housing, 318 dwellings have been constructed to date (2011-2016) and a further 1,631 dwellings have planning permission – a large majority of which are at ‘North East Bexhill’ – see box below. This leaves a remaining requirement of 1,151 dwellings to 2028.

- 13.9. There has also been significant progress in bringing business land forward since the construction of the Link Road, with completions and planning permissions to date already accounting for some 32,738sqm of floorspace. Hence, there is a need to identify at least a further 27,262sqm through this Plan.

North East Bexhill

Sites either side of the then proposed Bexhill to Hastings Link Road at North East Bexhill, forming a major urban extension to the town, were allocated for mixed-use developments in the Rother District Local Plan adopted in 2006.

‘Land north of Pebsham’ was the larger area and its development was the subject of Policy BX2 of that Plan. This envisaged a new community with a well-defined neighbourhood centre including a primary school, as well as business development in the western part nearer the Link Road. Policy BX3 covered proposals for development to the west of the Link Road at ‘land north of Sidley’.

The requirements of these policies were elaborated upon and refined through the North East Bexhill Supplementary Planning Document, (SPD) published following public consultation, in 2009.

Following construction of the Link Road, now called Combe Valley Way and a new road connecting it to Wrestwood Road – named Mount View Street and completed in December 2015, outline planning permission was granted for Bexhill Enterprise Park in January 2014. The first building was completed in December 2015.

In September 2015, it was resolved that the development area adjoining Pebsham would be named ‘Worsham’. Within Worsham, planning permission was granted for 108 dwellings accessed from Pebsham Lane in May 2015 (RR/2014/1223/P) and these are under construction.

In March 2016 outline planning permission was granted for a residential-led mixed use development providing 1,050 dwellings and associated facilities, based around Worsham Farm (RR/2015/1760/P).

Reserved matters submissions relating to these outline planning permissions or any planning applications within the area will be expected to accord with prevailing Local Plan policies as well as the provisions of the North East Bexhill SPD.

The developments to the west of Combe Valley Way that were the subject of Policy BX3 have not yet gained planning permission; hence, these are reallocated.

- 13.10. The Core Strategy also identified a retail investment potential in the town; its Policy BX2 looks for provision of some 2,000sqm additional convenience goods and 4,000sqm comparison goods floorspace, primarily through edge of centre development north of the railway, as well as effective use of town centre units.

Site options for employment

- 13.11. The background to business site proposals is contained in the Employment Sites Review. The preferred development site for employment is 'Land at Levett's Wood and Oaktree Farm, Sidley' (Ref, BX113).

Preferred Site: Land at Levett's Wood and Oaktree Farm, Sidley (Ref: BX113)

Existing use(s)	Greenfield site (farmland and equestrian use)
Size	14.3ha
Key constraints/opportunities	<p>A landscape of gently rolling, enclosed, well-wooded countryside and tall hedgerows. Levett's Wood, to the south, is an Ancient Woodland providing a buffer to existing housing at Sidley. The grazed fields create an impression of woodland clearings. The land slopes gently down to the north, towards Combe Haven. The sunken Buckholt Lane, with its species-rich hedges and fringing trees, cuts through the area. The only buildings are those at Oaktree Farm.</p> <p>The North Bexhill Access Road (NBAR), currently under construction, will form the northern boundary of the site and provide vehicle, cycle and pedestrian access.</p> <p>The site is well-contained and largely separated from residential areas to the south and west. It was allocated for 'major business development' in the Rother District Local Plan (2006) as part of the North East Bexhill urban extension (Policy BX3). It remains an important employment site to meet business floorspace needs over the plan period, offering direct access via the NBAR to Combe Valley Way.</p> <p>It is proposed that there will be one access off a roundabout onto NBAR at Buckholt Lane to serve the three discrete land parcels that comprise the site. Internal road connections should involve minimal intervention to the intervening tree belts; these may need to be strengthened – see below.</p> <p>A comprehensive approach is required to ensure integrated provision of employment floorspace, high quality urban design, green infrastructure and mitigation and/or compensation for any biodiversity losses. The degree of self-containment allows different design approaches for each development area.</p>

Key constraints/opportunities	<p>Buildings should be set within a strong landscape structure, both through the site and around its perimeter to minimise its visual impact. Flexible building design is encouraged, to suit a variety of possible business requirements. Development should be well set back from the NBAR. The most appropriate form would be buildings clustered around a predominantly rural natural grassed informal central space to retain 'woodland clearing' site character, combined with the creation of water features to both "soften" development and, together with ponds, provide a sustainable drainage system.</p> <p>Office and light industrial uses are expected, being most compatible with the strategic importance of the site and the business land requirements of the area.</p> <p>The layout should take full account of existing site features, strengthening existing tree belts to provide informal amenity space, providing new green links to form a series of connected spaces and corridors, softening the visual impact of commercial buildings both by partial screening and physical separation, preserving generous areas for the movement of wildlife through the site and accommodating attractive cycle/footpath links.</p> <p>The gently sloping ground may accommodate a range of building sizes, but larger buildings should be cut into the slope to minimise their height and associated visual impact.</p> <p>Linkages with facilities and services in Sidley are vital and will be achieved by improving Buckholt Lane as the main footpath, cycleway and bridleway route from Sidley, creating an attractive pedestrian/cycle route to the proposed residential allocation to the west (Policy BEX2) and connecting to the linear park and new housing of Policy BEX3 (North Bexhill).</p> <p>Land along the Combe stream to the north-west of the site should be retained as an amenity/wildlife corridor. This includes land around Pebsham Hall and Cottage (both Grade II listed).</p> <p>Beyond the site to the east, adjacent to the Combe Valley Way (Bexhill Hastings Link Road), lies a sloping field that constitutes a green "tongue" as part of the Countryside Park. This is excluded from the business area and should remain open.</p>
Proposed use(s)	Employment.
Developable area	Developable area is constrained by existing mature trees and hedges on field boundaries and the need for ancient woodland buffer planting but estimated to be 9.3ha (subject to ecological surveys).
Capacity	28,000sqm (at a floorspace to site area ration of 0.3)

Figure 16. BX113 Aerial Map

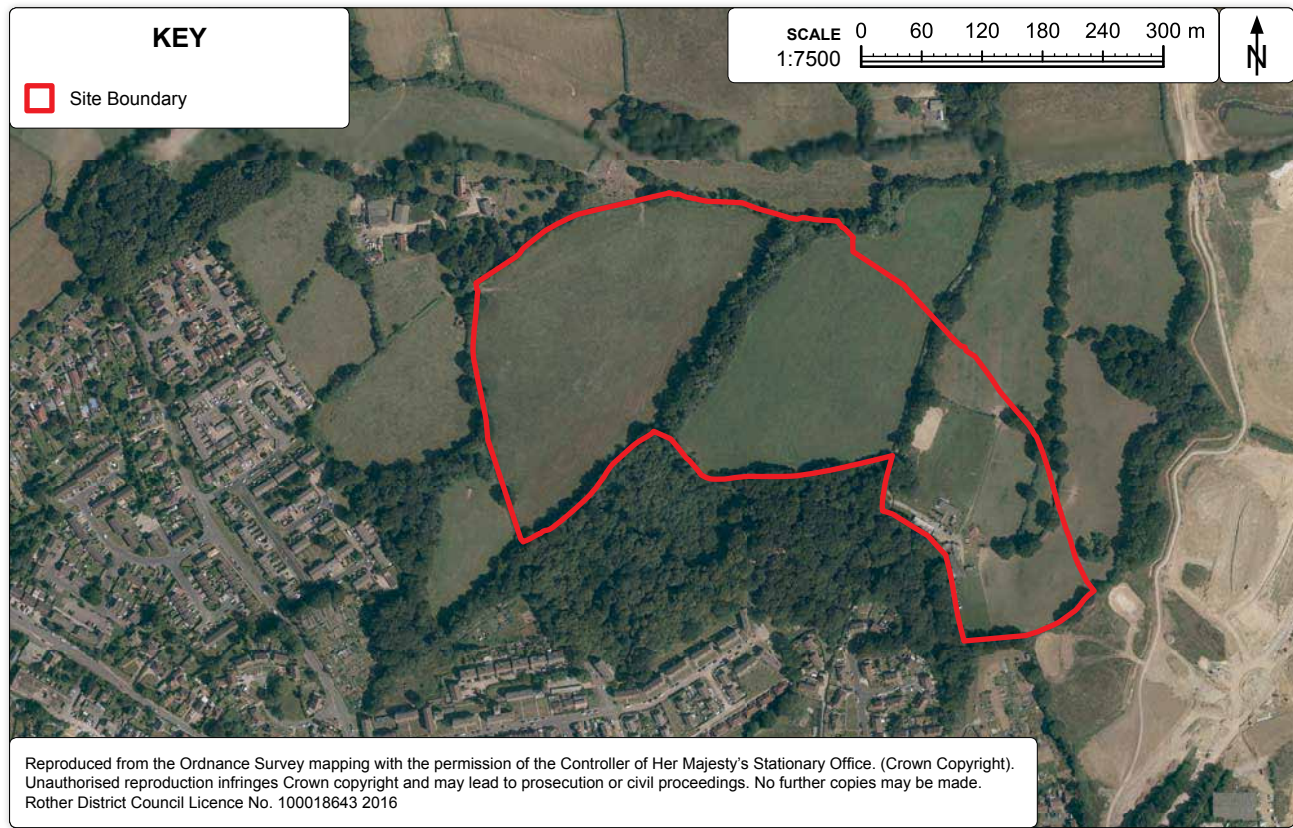
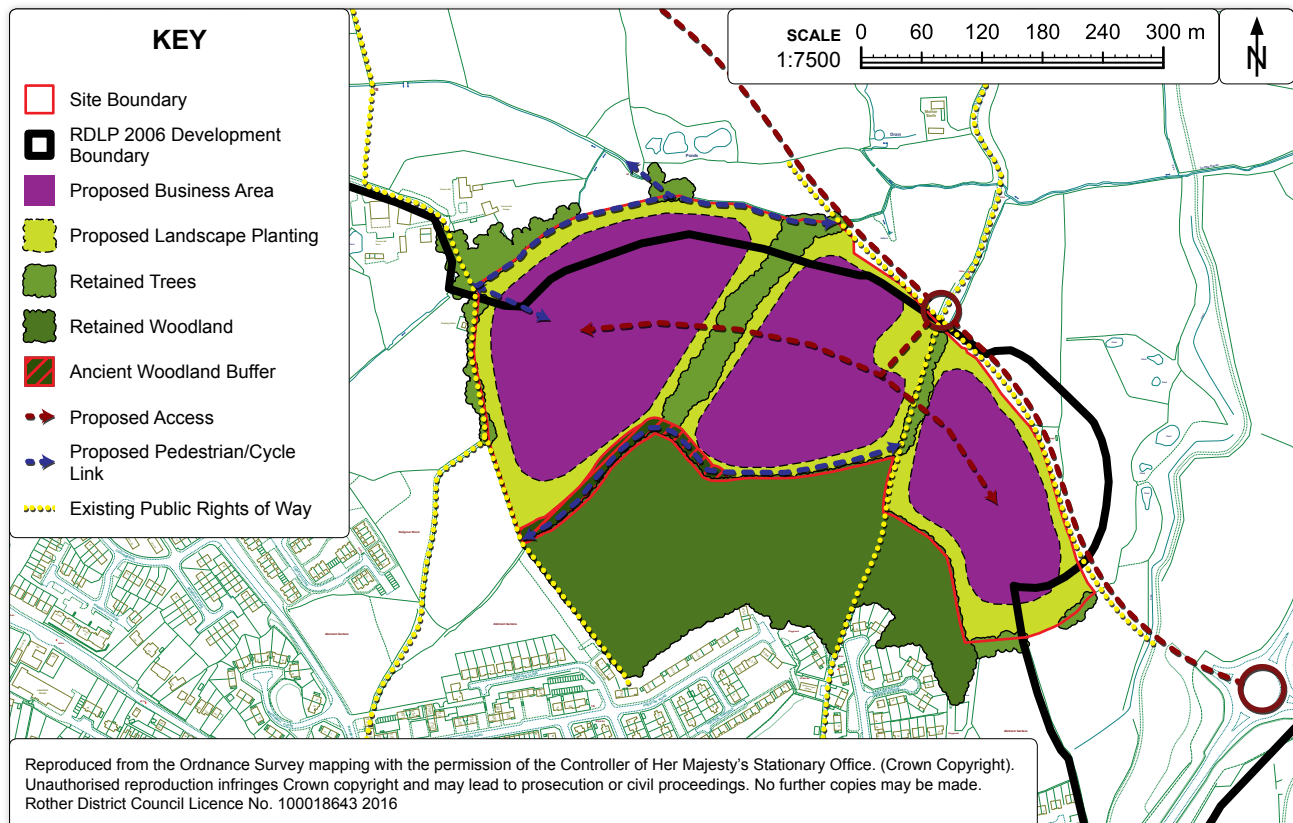


Figure 17. BX113 Detail Map



Policy BEX1: Land at Levetts Wood and Oaktree Farm, Sidley

Land at Levetts Wood and Oaktree Farm, Bexhill, as shown on the Policies Map, is allocated for a comprehensive business development. Proposals will be permitted where:

- (i) proposals conform to a masterplan covering the entire policy area;
- (ii) some 28,000sqm of business floorspace is provided. This will be predominantly light manufacturing and offices, falling within Class B1 of the Use Classes Order;
- (iii) vehicle, cycle and pedestrian access is provided from the North Bexhill Access Road's Buckholt Lane roundabout, together with cycle and pedestrian access through the site to the adjacent residential allocation (Policy BEX2), pedestrian access to the footpath on the western boundary and cycle and pedestrian access to the urban extension envisaged by Policy BEX3; and
- (iv) existing landscaped boundaries around the site are maintained and reinforced and proposals for structural open spaces, landscape and woodland belts are developed and implemented as an integral part of proposals.

QUESTION 26: Do you agree with the requirements of Policy BEX1 ? If not, how would you wish to see it amended?

Site options for housing

- 13.12. Fourty three sites were considered as options for potential housing development within Bexhill. The sites considered as potential housing sites can be identified in Figures 18, 19 and 20 below. The sites are spread throughout Bexhill, with a mix of sites within the existing built-up area but also a significant number concentrated on the peripheral areas of Bexhill adjacent to or removed from the existing development boundary.
- 13.13. The preferred development sites for housing are:
- BX19: Land at Preston Hall Farm, Bexhill
 - BX124: North Bexhill
 - BX4: Former High School Site and Drill Hall, Down Road
 - BX5: Knole Road, Bexhill
 - BX30: Cemetery Lodge Field/276 Turkey Road
 - BX64: Land at Moleynes Mead, Fryatts Way
 - BX81: Land South of Terminus Road, Bexhill
 - BX116: Land off Spindlewood Drive, Bexhill
 - BX120: Barnhorn Green Expansion, Bexhill
 - BX101: Northeye (Former United Arab Emirates -Technical Training Project)
- 13.14. The preferred housing sites generally comprise of a mix of small scale brownfield sites within the existing development boundary of Bexhill, with some larger, greenfield sites on the periphery. There are two significant areas of expansion identified in line with the broad locations identified within the Core Strategy: one area at North Bexhill where potential has been identified for some 450 dwellings and land off Spindlewood Drive to the west, where potential has been identified for some 160 dwellings. Altogether, these sites listed above yield some 1,046 dwellings which, together with completions since 2011, sites which have planning permission and the small site windfall allowance slightly exceeds the minimum target of 3,100 dwellings within Bexhill.
- 13.15. Further details of the assessment of all individual sites can be found in Appendix 3 while proposals for the preferred sites are elaborated upon below.

QUESTION 27: Do you agree with the preferred sites for housing development at Bexhill? If not, which site(s) should be preferred?

Figure 18. Bexhill East Housing Options Map

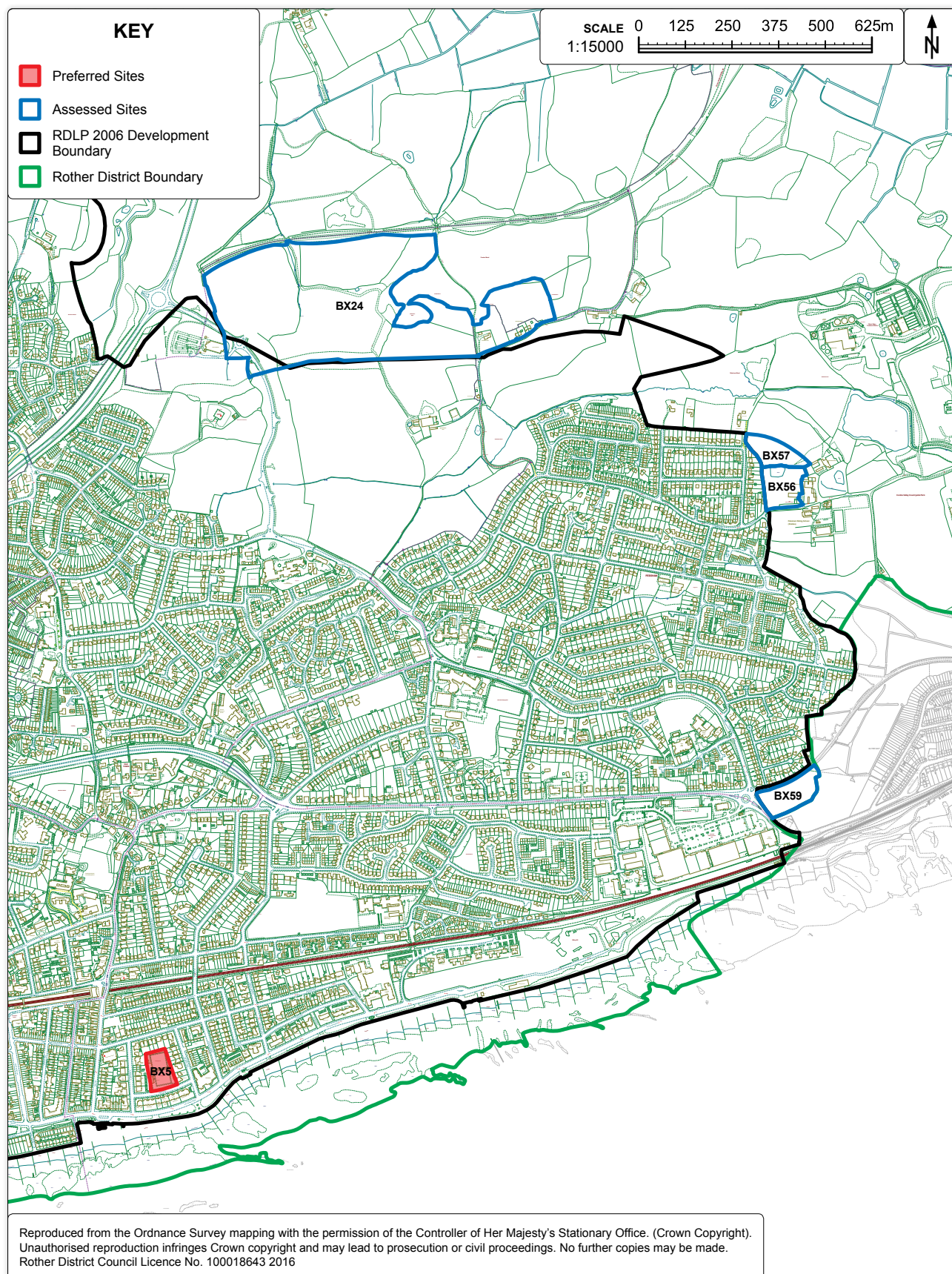


Figure 19. Bexhill North Housing Options Map

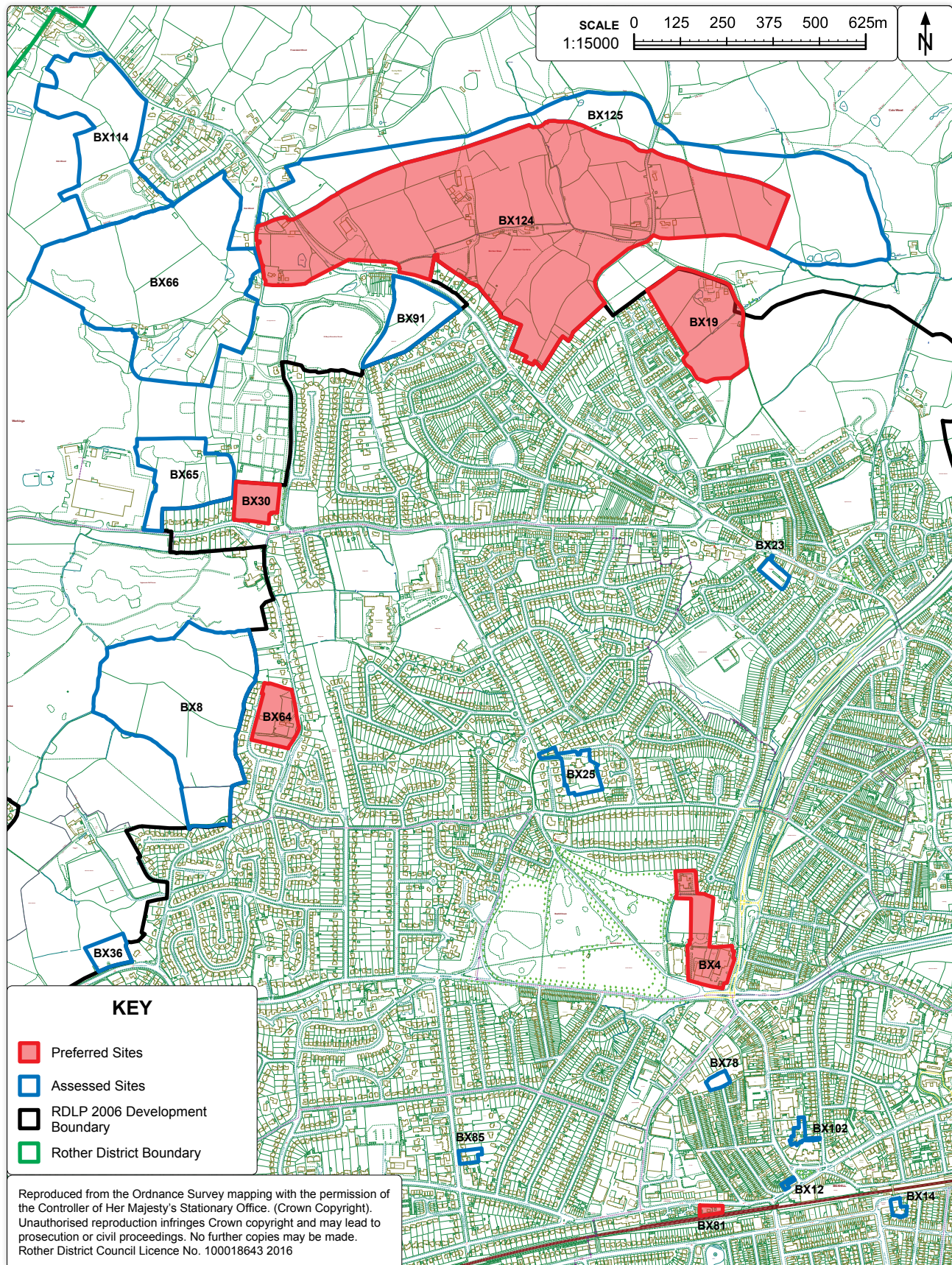
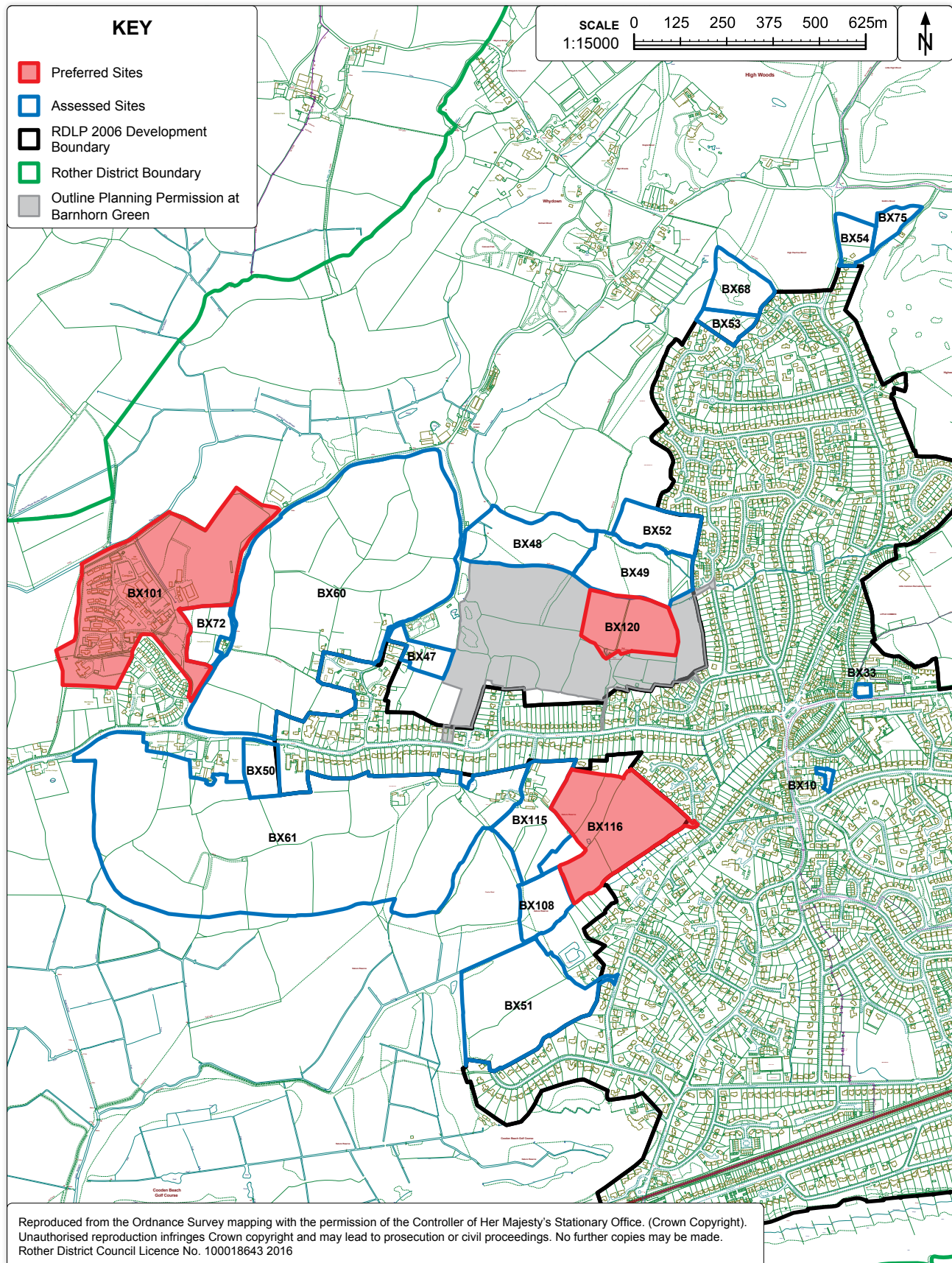


Figure 20. Bexhill West Housing Options Map



Preferred Site: Land at Preston Hall Farm, Sidley, Bexhill (Ref: BX19)

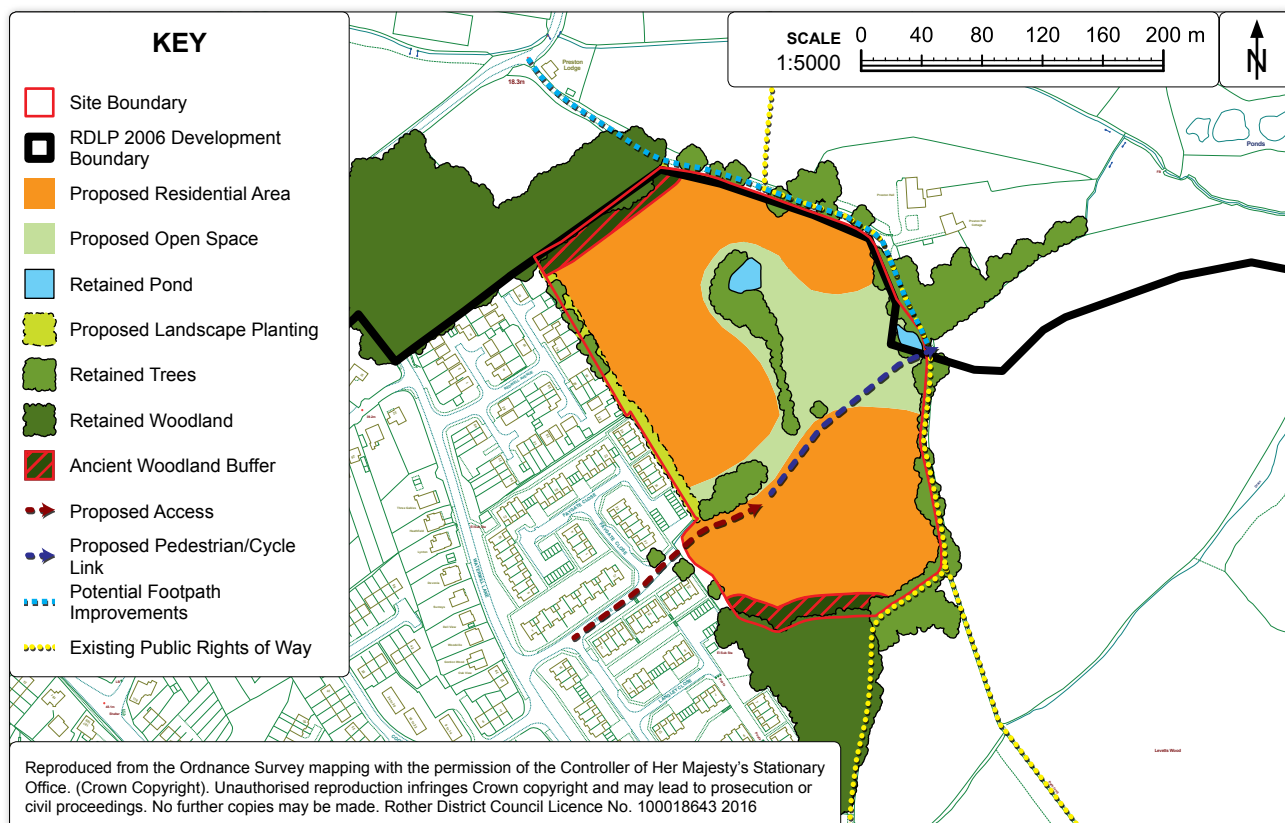
Existing use(s)	Greenfield site (farmland with farm buildings)
Size	5.24ha
Key constraints/opportunities	<p>The site is bounded by existing residential properties to the west, Redgrove Wood, which is designated as Ancient Woodland, and adjoining hedgerow to the north-west, a private lane (also a public footpath in part) to the Grade II Listed Preston Hall and Preston Hall Cottage to the north-east and a strong hedgerow to the east.</p> <p>The land slopes generally down to the north-east, but is also bisected by a ditch which naturally divides the site into two parts. A small pond occupies a central position just west of Preston Hall Farm.</p> <p>The site relates to the adjacent housing off Watermill Lane and an access can be created via Watergate. A vehicle, cycle and pedestrian access would be required through the upgrading of the existing spur and the alternative provision of existing parking spaces on Watergate.</p> <p>Development here should create a small residential enclave drawing on the positive natural characteristics of the site. The form of development should reflect the transition from the higher density, more suburban character of north Sidley to the countryside beyond, and should bring the countryside into Sidley.</p> <p>The site was allocated in the Rother District Council Local Plan (2006) as part of the North East Bexhill urban extension and remains an important part of that development.</p> <p>Linkages with facilities and services in Sidley as well as the countryside are vital and will be achieved by upgrading the existing footpath from Watermill Lane and retaining land as an amenity/wildlife corridor, both to the north of Combe stream and the land around Pebsham Hall and Cottage (both Grade II listed), creating an attractive pedestrian/cycle route from the proposed employment allocation to the east (Policy BEX1); and pedestrian/cycle connection to the linear park and new housing of Policy BEX3 (North Bexhill).</p> <p>The layout should take full account of existing site features – the pond, (which could form a focus for a “village green” as well as a sustainable drainage system), tree cover around it, the hedgerow, existing properties to the west and ecological considerations.</p>

Key constraints/ opportunities	<p>Given the tenure of existing housing in the locality, as well as low levels of economic activity, the affordable housing here should provide for a range of tenures including intermediate housing to encourage low-cost home ownership and re-balance the housing and social mix.</p> <p>Older children's play would most effectively be provided for by upgrading the existing 'Levetts Field' adjoining the site to the south, while younger children should benefit from open space in the scheme.</p> <p>The traffic implications of development on the Watermill Lane/ A269 junction will be lessened with construction of the North Bexhill Access Road, although it may still impact on the A269/ Holliers Hill /A2036 Wrestwood Road/ London Road junctions, the need for improvements to which have been identified through traffic modelling. Contributions to primary and nursery school education provision at NE Bexhill are also expected, to ensure sufficient capacity in the locality.</p>
Proposed use(s)	Residential and amenity open space.
Developable area	Developable area is constrained by buffer requirement to existing residential properties/vegetation/pond/ancient woodland as well as the need to provide amenity open space, but estimated to be around 3.8ha (subject to ecological surveys).
Capacity	135 dwellings (estimated) plus amenity open space.

Figure 21. BX19 Aerial Map



Figure 22. BX19 Detail Map



Policy BEX2: Land at Preston Hall Farm, Sidley

Land at Preston Hall Farm, as shown on the Policies Map, is allocated for a comprehensive scheme comprising residential development and amenity open space. Proposals will be permitted where:

- (i) approximately 135 dwellings are provided, of which 30% are affordable;
- (ii) the development provides an amenity open space centred on the existing pond. The layout of the site will be such that the green will be afforded passive surveillance from adjacent residential properties;
- (iii) a new vehicle, cycle and pedestrian access is achieved off Watergate, together with cycle and pedestrian access through the site to the adjacent employment allocation (Policy BEX1); upgrading of the footpath to Watermill Lane on the eastern boundary; and cycle and pedestrian connectivity to the adjacent urban extension (Policy BEX3);
- (iv) existing landscaped boundaries around the site are maintained and reinforced;
- (v) care is taken to respect, the amenity value and setting of adjoining properties on the eastern boundary; and
- (vi) development contributions towards improvements to the A269/Holliers Hill /A2036 Wrestwood Road/ London Road junctions and towards primary and nursery school education provision at NE Bexhill.

QUESTION 28: Do you agree with the requirements of Policy BEX2? If not, how would you wish to see it amended?

Preferred Site: North Bexhill (Ref: BX124)

Context

- 13.16. Within the context of Bexhill being the focus of development in Rother District, Local Plan Core Strategy Policy BX3 set out targets of some 3,100 additional homes and 60,000sqm of business space planned over period 2011-2028. To accommodate this scale of growth, it states that the primary focus is on development to the north of Pebsham and Sidley (as already planned through the Rother District Local Plan 2006 and the related North East Bexhill Supplementary Planning Document), together with further sites to the north and west of the town.

- 13.17. The broad location for future development is shown on the Core Strategy Bexhill Inset Diagram. The Core Strategy identifies the opportunity provided by construction of the now approved North Bexhill Access Road¹ (NBAR) to provide access not only to the previously allocated business sites, but also to further development extending westwards.
- 13.18. Alongside the ongoing development to the east of the new Bexhill to Hastings link road (Combe Valley Way), development in this area will have a key function not only in meeting the town's development requirements, but also in contributing to the overall vision for it to be one of the most attractive places to live on the south coast, more prosperous and vibrant with a more balanced demographic profile.
- 13.19. The area of investigation forms the slopes either side of the Combe Haven to the north of the existing built-up area. It is currently open, farmed land for the most part, with intervening tree/hedge belts and woodland blocks, but with urban fringe influences in the form of established allotments and horse paddocks. Also, to the east of the A269, there is a strong visual relationship with the existing settlement edge, including existing housing along Ninfield Road, Mayo Rise and Mayo Lane, although it becomes more rural in character towards Watermill Lane. The more rural character of the land to the east of Watermill Lane will change following development of land around Preston Hall Farm that was allocated for development in the 2006 Local Plan and is proposed to be carried forward in this Plan (See Policies BEX1 and BEX2). In contrast the western end of the 'broad location', west of the A269, is more separated from the wider settlement by the Cemetery and St Mary's Recreation Ground.

Site Options

- 13.20. The Council considers that development options should take their lead from the landscape and ecological context. Hence, a 'Landscape and Ecology Study' provides a key document from which guiding principles for development are developed.
- 13.21. Three options have been developed, with differing level of, principally housing, development:

Option 1: 450 dwellings²

Option 2: 515 dwellings² + 6,500sqm of business floorspace

Option 3: 665 dwellings² + 6,500sqm of business floorspace

These give distinct options for consideration, of a scale of development broadly in line with the indicative scale of housing growth suggested in this broad location in the Strategic Housing Land Availability Assessment, 2013, also taking account of the now known line of the North Bexhill Access Road. Each of the options is shown on the plans below.

¹ Planning application reference RR/2015/2260/P

² Based on 30 dwellings per hectare of net developable area on the basis that some ancillary amenity and recreation provision is within the adjacent green space.

Figure 23. North Bexhill Detail Map - Option 1 (Preferred Option)

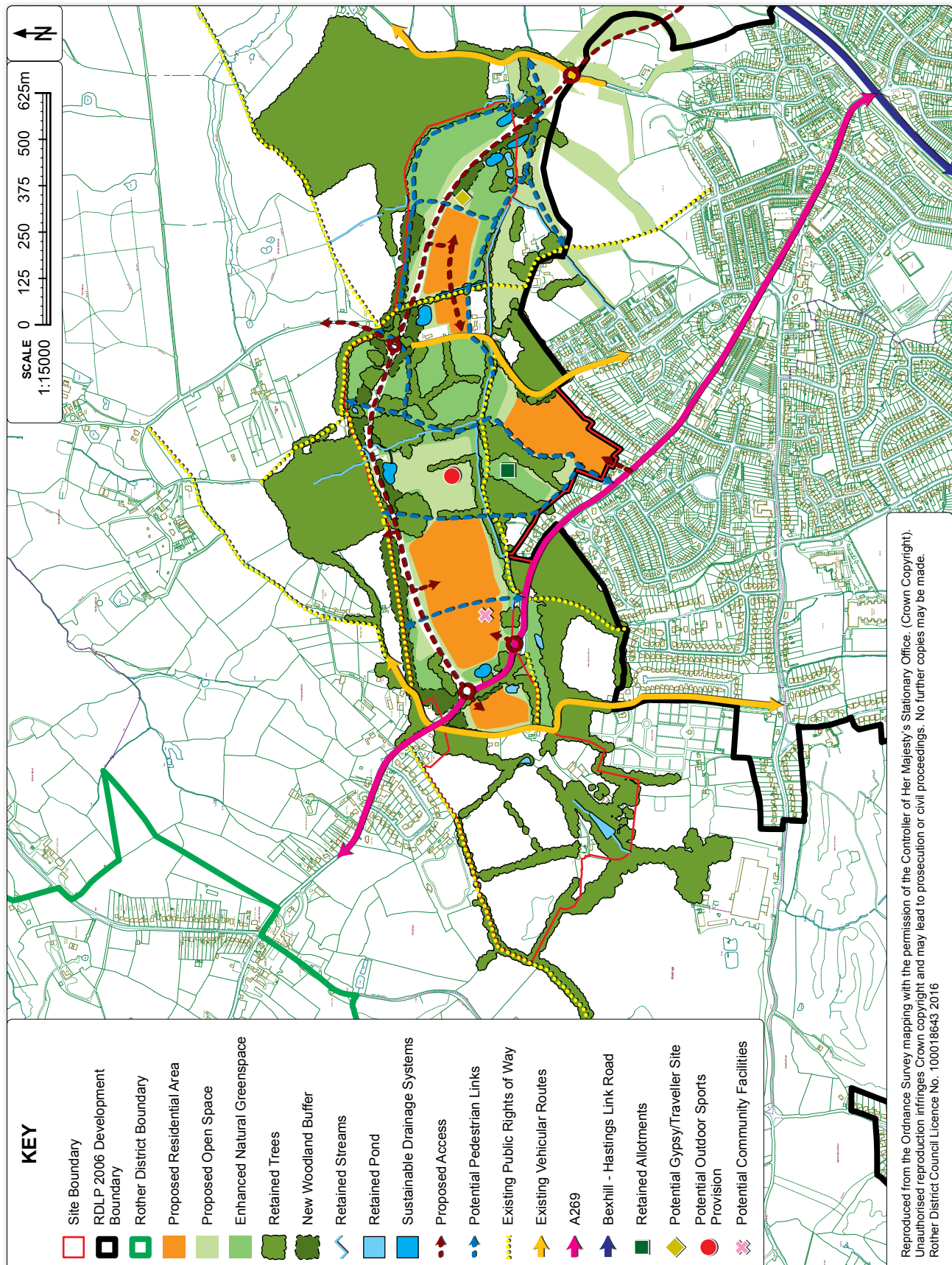


Figure 24. North Bexhill Detail Map - Option 2

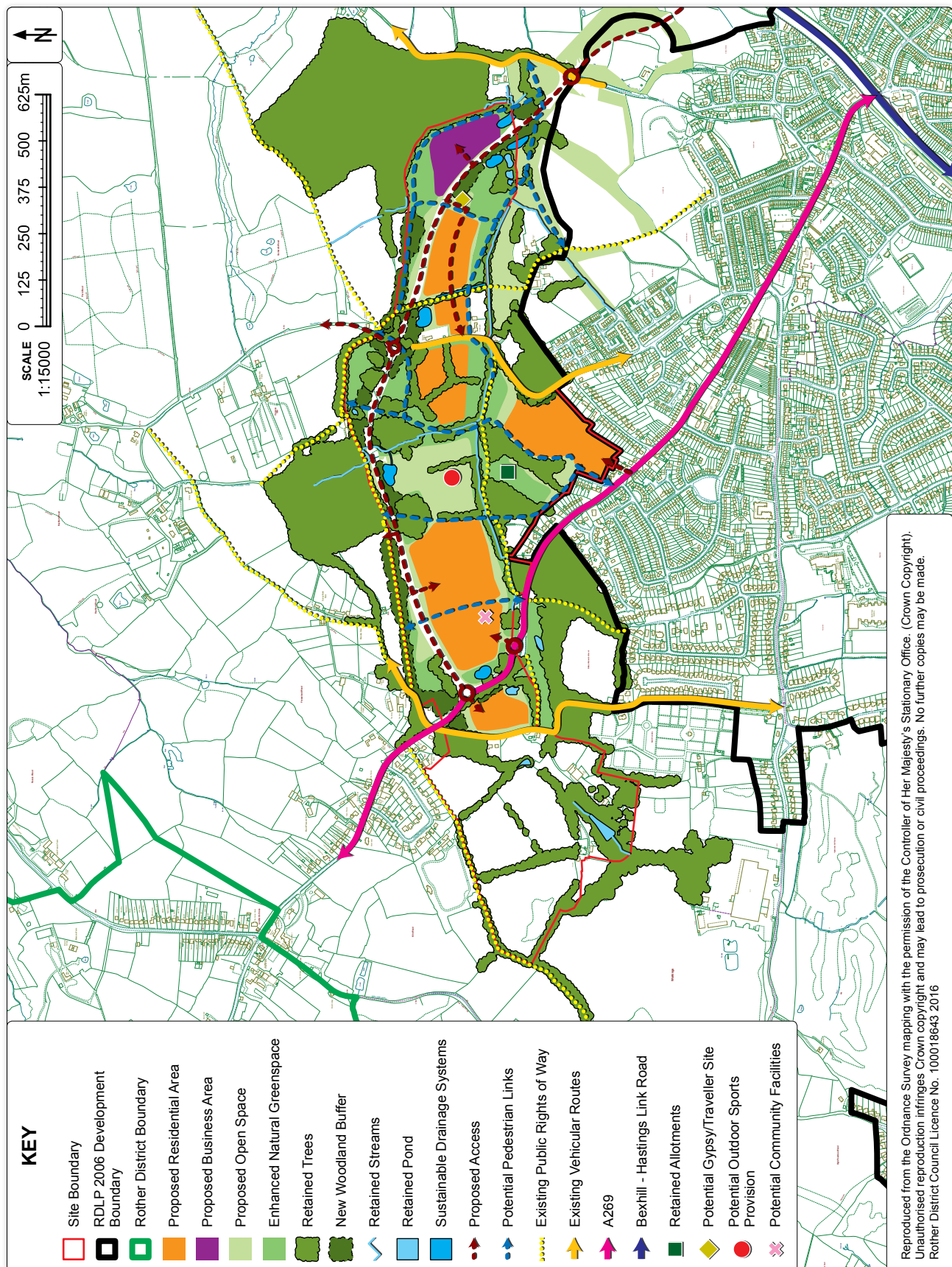


Figure 25. North Bexhill Detail Map - Option 3

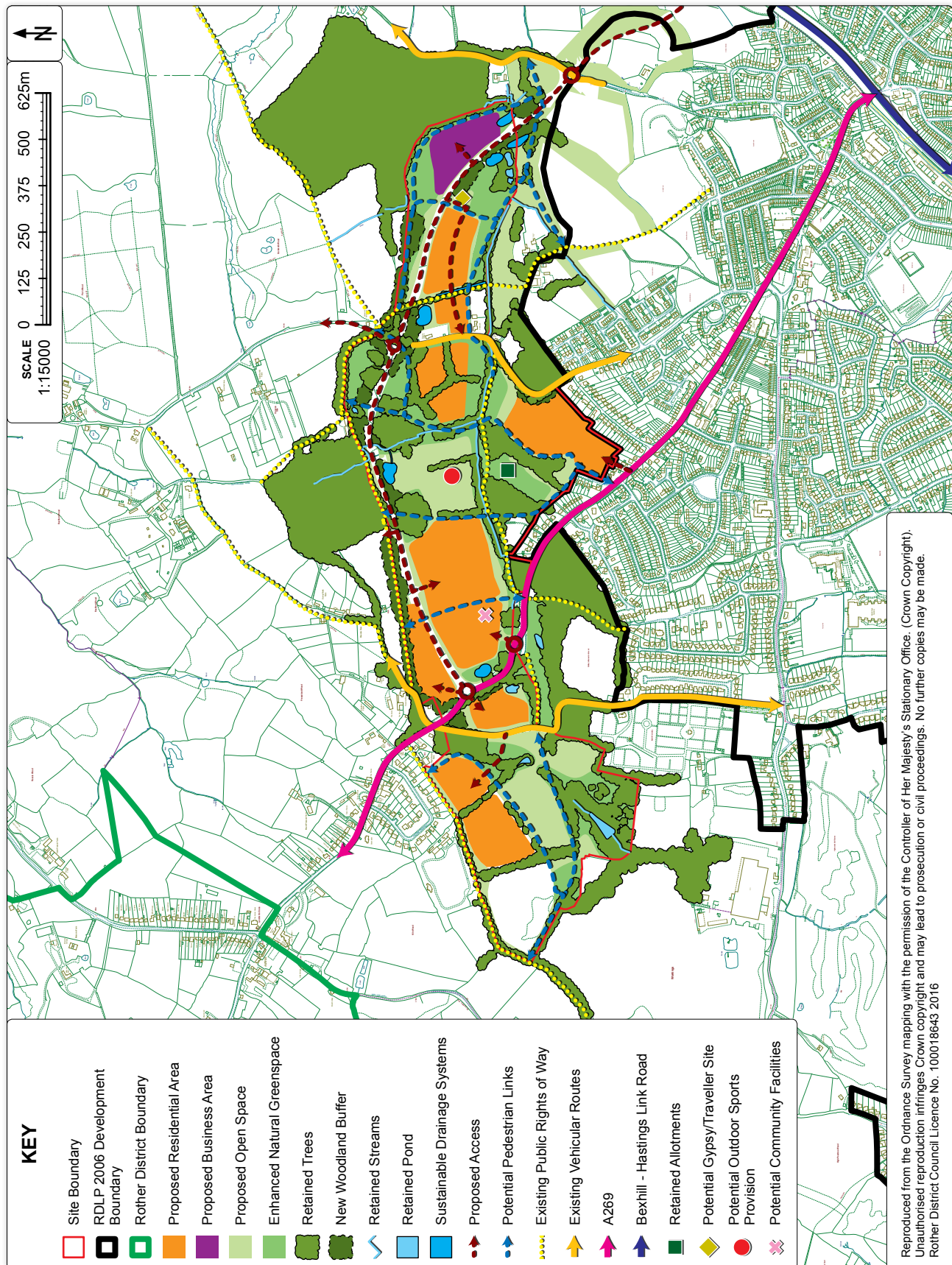
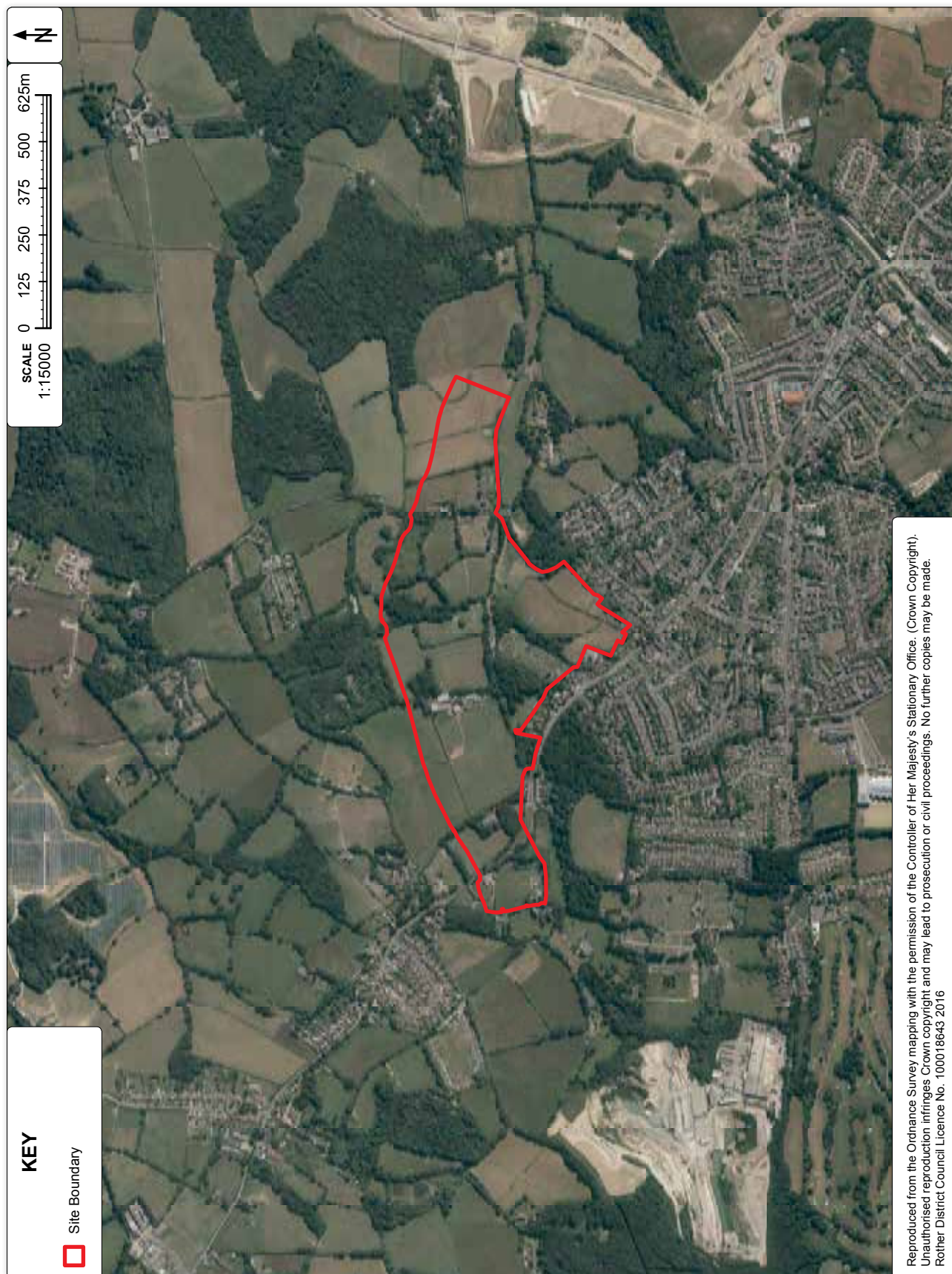


Figure 26. North Bexhill Aerial Map



- 13.22. It can be seen that Option 2 differs from Option 1 in that it also includes residential development on the west side of Watermill Lane and business development to the north east of the NBAR, while Option 3 further includes residential development to the north of the NBAR and a much larger area of residential development west of the A269 than in the other options. A small travellers' site is common to all options. This is proposed to accommodate five pitches, in line with the provisions in the Housing section.
- 13.23. Considerable "green infrastructure" is integral to the respective development options, all of which create a broad green corridor along the valley bottom of the Combe stream and incorporate significant additions to the network of footpaths.
- 13.24. Option 1 is found to be most sustainable, as the additional areas of development in Options 2 and 3 are found to lack the containment provided by the new road, which is regarded as an important factor in maintaining the setting of the town and avoiding visual intrusion into the rural landscape to the north. Also, the development of the small fields west of Watermill Lane would involve the loss of an ecologically more valuable grassland habitat. Also, Option 3 would result in coalescence with The Thorne and Lunsford Cross, and an inappropriate "urban creep" into the more rural approach to the town, while the development west of St Mary's Lane is not seen as a natural extension of the town, as well as creating serious traffic issues.

Preferred Development Option: North Bexhill Option 1 (Ref: BX124)

Existing use(s)	Most agricultural, some woodland, equestrian uses, residential
Size	c50ha
Key constraints/opportunities	<p>Housing should be of a high quality, befitting a sustainable urban extension on a key approach to the town, with a high proportion of family homes and a modest net density, which should also take account of the local topography and existing landscape features, including trees and hedges.</p> <p>Accessibility to local services will require careful attention, with further consideration of bus services along the NBAR to complement or link to that along the Ninfield Road in order that all housing is within easy walking distance of a bus stop.</p> <p>Both existing and new residents should benefit from the proposed extensive areas of open space, which should be structured to create a series of green corridors, principally along the valley bottom, connecting to larger areas of public open space, to include recreation facilities with playing pitches, natural amenity spaces or play areas, and to the Countryside Park further to the east.</p>

Key constraints/ opportunities	<p>There are several existing footpaths crossing the area, which should be retained and new connections created to them, in order to improve public access through the area and into the wider countryside. In particular, an east-west route alongside the stream course may be the main artery for sustainable travel.</p> <p>To mitigate the traffic impacts of the new development, as well as new bus, cycle and pedestrian facilities, developments will need to provide the necessary works to secure safe and effective access into the site and to manage impacts on the local road network, notably to restrict inappropriate rat-runs along St Mary's Lane and Peartree Lane. Further consideration should be given to the position of junctions to minimise turning movements on the NBAR and to maximise connectivity to the existing urban area.</p> <p>No new school provision is anticipated, but further consideration should be given to local shops and community facilities to meet the needs of the development, to complement measures to encourage easy access to Sidley District Centre.</p> <p>Further consideration should be given to renewable energy options, including maximising passive solar gain.</p> <p>Overall, a comprehensive approach is required, not least to ensure the integrated provision of housing and infrastructure, not least the green infrastructure and mitigation and/or compensation for any biodiversity losses.</p>
Proposed use(s)	Housing, public open space, semi-natural green space and supporting community facilities, together with a small travellers site and access improvements.
Developable area	15ha residential.
Capacity	Some 450 dwellings, 5 traveller pitches.

Policy BEX3: Land at North Bexhill

Land at North Bexhill, as shown on the Policies Map, is allocated for a mixed development incorporating housing together with substantial green space for public open space and amenity purposes.

A comprehensive approach to the delivery of development in parallel with the provision of the green space and other infrastructure will be required. This will be achieved through preparation of a Supplementary Planning Document. In particular, it will provide for:

- (i) development to be contained to the south of the approved North Bexhill Access Road;**

- (ii) retention of a local open gap between new development and Lunsford Cross;
- (iii) some 450 dwellings, of which 30% are affordable;
- (iv) a small travellers site, for 5 pitches;
- (v) the creation of a linear park, predominantly semi-natural green space and incorporating footpath and cycle routes, alongside the Combe stream;
- (vi) a new recreation area, including playing pitches, with arrangements for its layout and ongoing management;
- (vii) retention of Ancient Woodland, as well as other trees and hedgerows as far as practicable;
- (viii) the identification of areas of habitat retention and mitigation, to be based on an area-wide ecological strategy, with arrangements for its implementation;
- (ix) identification of local community facilities, including local shops and services;
- (x) footpath and cycle routes that connect to the existing Public Rights of Way network and to routes to be provided as part of developments to the east;
- (xi) a restriction on the occupation of development until the NBAR is constructed and open to traffic;
- (xii) traffic mitigation measures to manage flows along St Mary's Lane and Peartree Lane; and
- (xiii) improvements to the A269 to improve traffic safety and residential amenities in the vicinity of St Mary's Cottages.

QUESTION 29: Do you agree with the requirements of Policy BEX3? If not, how would you wish to see it amended?

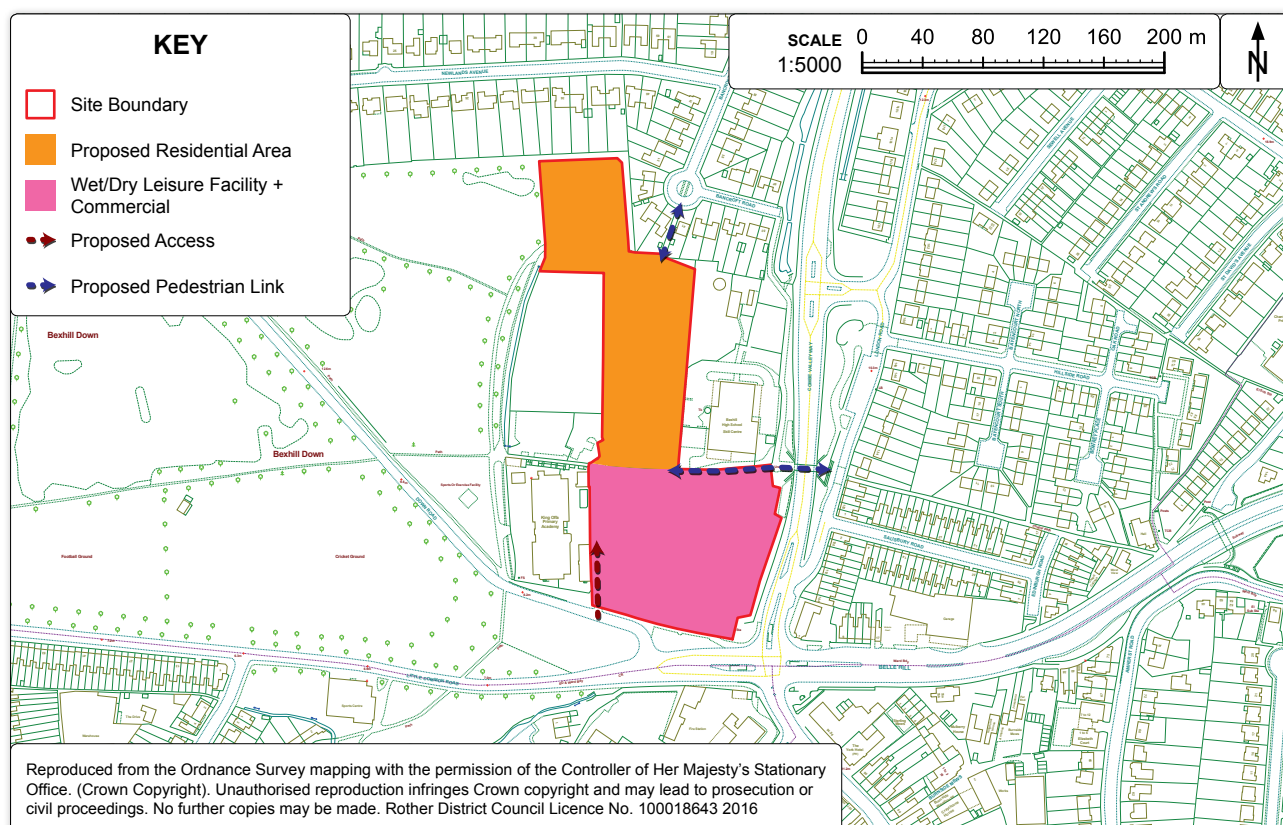
**Preferred Site: Former High School Site and Drill Hall, Down Road, Bexhill
(Ref: BX4)**

Existing use(s)	Leisure Centre, Drill Hall, skate park, motorcycle training area, former school canteen.
Size	2.4ha
Key constraints/ opportunities	<p>This site is identified for mixed use in the Rother District Council Local Plan (2006) for offices, community buildings and high density housing. Part of the identified site in the Local Plan (2006) has been developed for the Skills Centre (east of the site, with land to the north for a possible extension in due course). The King Offa Primary School, playing field and nursery is situated on the western part of the site and therefore also no longer forms part of the development area. The existing leisure centre is situated to the south of the site along with the Drill Hall. The Bexhill Hastings Link Road (Combe Valley Way) forms the eastern boundary.</p> <p>The site is located on a prominent position at the Bexhill end of Combe Valley Way and allows for the opportunity to create a landmark destination for leisure facilities.</p> <p>There is a need for a comprehensive consideration of the site to ensure a high quality public realm on this highly prominent gateway site into the town.</p> <p>There are aspirations for a combined wet and dry sports and leisure facility on one site along with other complementary facilities to create a leisure destination, along with a modest number of dwellings.</p> <p>Access is likely to be from Down Road, although there is potential to access the site from Combe Valley Way.</p> <p>The Drill Hall will require relocation as a part of any scheme.</p> <p>The development should focus on an accessible, sustainable and high quality leisure hub facility, through the creation of high quality buildings and public realm on this highly prominent gateway site into the town.</p>
Proposed use(s)	Mixed use (wet/dry leisure facility, residential, hotel, restaurant space, car parking to serve adjacent school).
Developable area	1.17ha (residential area only).
Capacity	Some 30 residential dwellings, wet/dry leisure facility (circa 6,000sqm), hotel (circa 80 beds), restaurant space (circa 800sqm), plus car/coach parking for adjacent school.

Figure 27. BX4 Aerial Map



Figure 28. BX4 Detail Map



Policy BEX4: Land at Former High School Site and Drill Hall, Down Road, Bexhill

Land at Former High School Site and Drill Hall, Down Road, Bexhill, as shown on the Policies Map, is allocated for mixed use development creating a leisure destination, comprising of a wet/dry leisure facility, housing, hotel, restaurant space, and associated car parking to serve adjacent school.

Development should focus on an accessible, sustainable and high quality leisure hub facility, creating a landmark leisure destination through high quality buildings and public realm on this highly prominent gateway site into the town.

Proposals will be permitted where:

- (i) a high quality wet and dry sports and leisure facility of around 6,000sqm;
- (ii) some 30 dwellings are provided, of which 30% are affordable;
- (iii) complementary commercial development, including a 80-100 bed hotel, plus up to 4 units of restaurant space each around 200sqm;
- (iv) car-parking to serve the development, along with associated car/coach parking and drop-off area for the adjacent school;
- (v) the Drill Hall facility has been provided for at an alternative location; and
- (vi) provision is made for the retention and enhancement of boundary planting on the northern boundary.

Development of the site should be through a comprehensive masterplan.

QUESTION 30: Do you agree with the requirements of Policy BEX4? If not, how would you wish to see it amended?

Preferred Site: Land at Gullivers Bowls Club, Knole Road (Ref: BX5)

Existing use(s)	Two outdoor bowls greens (one disused), pavilion and clubhouse and indoor rink.
Size	0.7ha
Key constraints/opportunities	<p>The site is located within the development boundary of Bexhill. The site is surrounded on three sides by properties in Middlesex Road, Brassey Road and Cantelupe Road whilst there is a substantial Grade II listed terrace of late-Victorian dwellings in De la Warr Parade on the south side of Knole Road. The site is just to the east of the Bexhill Town Centre Conservation Area and visually forms part of the setting of the listed terrace to the south known as De La Warr Parade.</p> <p>The site is on the northern side of Knole Road and is roughly rectangular in shape. The site steps up by approximately 1.5m from Knole Road to its northern boundary, whilst east to west the site is relatively level.</p> <p>The site is currently used as an outdoor bowls facility consisting of 2 outdoor greens (one is disused) with an additional indoor rink, along with other associated facilities. The existing bowls club buildings run along the length of the western boundary and are in poor condition.</p> <p>The site is well related to the town centre and other associated services such as doctors. There are also nearby bus services connecting to the town and wider transport network within walking distance. The train station is also within a reasonable walking distance.</p> <p>A recent High Court Decision quashed the 2014 application for 39 sheltered housing units – (Case No: C1/2015/2398) on grounds of failed consultation of the Victorian Society.</p>
Proposed use(s)	Sheltered housing plus replacement outdoor bowls green, indoor rink and other bowling club facilities.
Developable area	0.7ha
Capacity	39 sheltered housing units.

Figure 29. BX5 Aerial Map

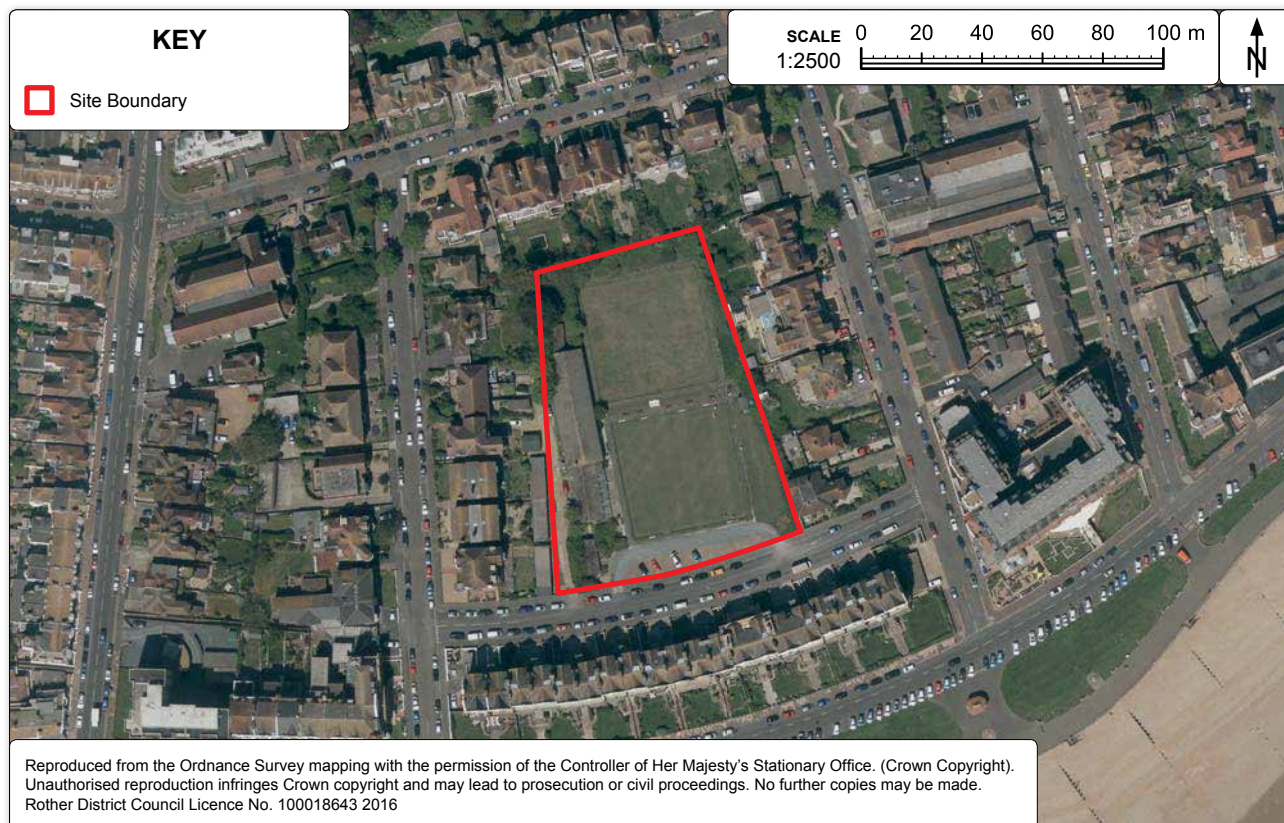
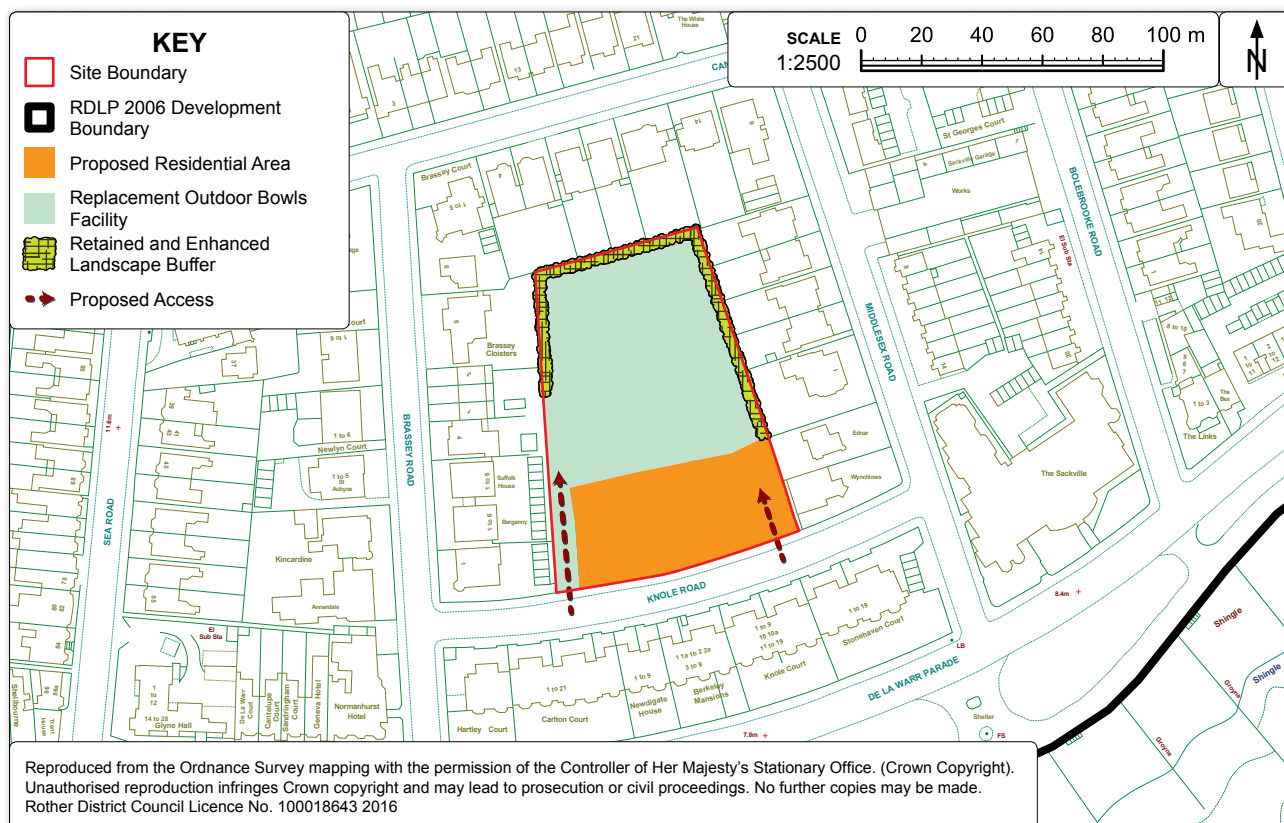


Figure 30. BX5 Detail Map



Policy BEX5: Land at Gullivers Bowls Club, Knole Road, Bexhill

Land at Gullivers Bowls Club, Knole Road, Bexhill, as shown on the Policies Map, is allocated for mixed use development comprising of housing and a replacement bowls facility. Proposals will be permitted where:

- (i) some 39 sheltered dwellings are provided, of which 30% are affordable;
- (ii) an improved bowls facility comprising of an outdoor bowls green, an indoor rink and associated clubhouse and maintenance facilities is provided;
- (iii) development at the rear of the site is single storey only;
- (iv) separate access points are provided for the residential and bowls facility part of the scheme;
- (v) the design of the scheme does not adversely affect the character of the area or the setting of the listed terrace to the south; and
- (vi) provision is made for the retention and enhancement of boundary planting, particularly on the western, northern and eastern boundaries.

QUESTION 31: Do you agree with the requirements of Policy BEX5? If not, how would you wish to see it amended?

Preferred Site: Land adjacent to Cemetery Lodge /276 Turkey Road, Bexhill (Ref: BX30)

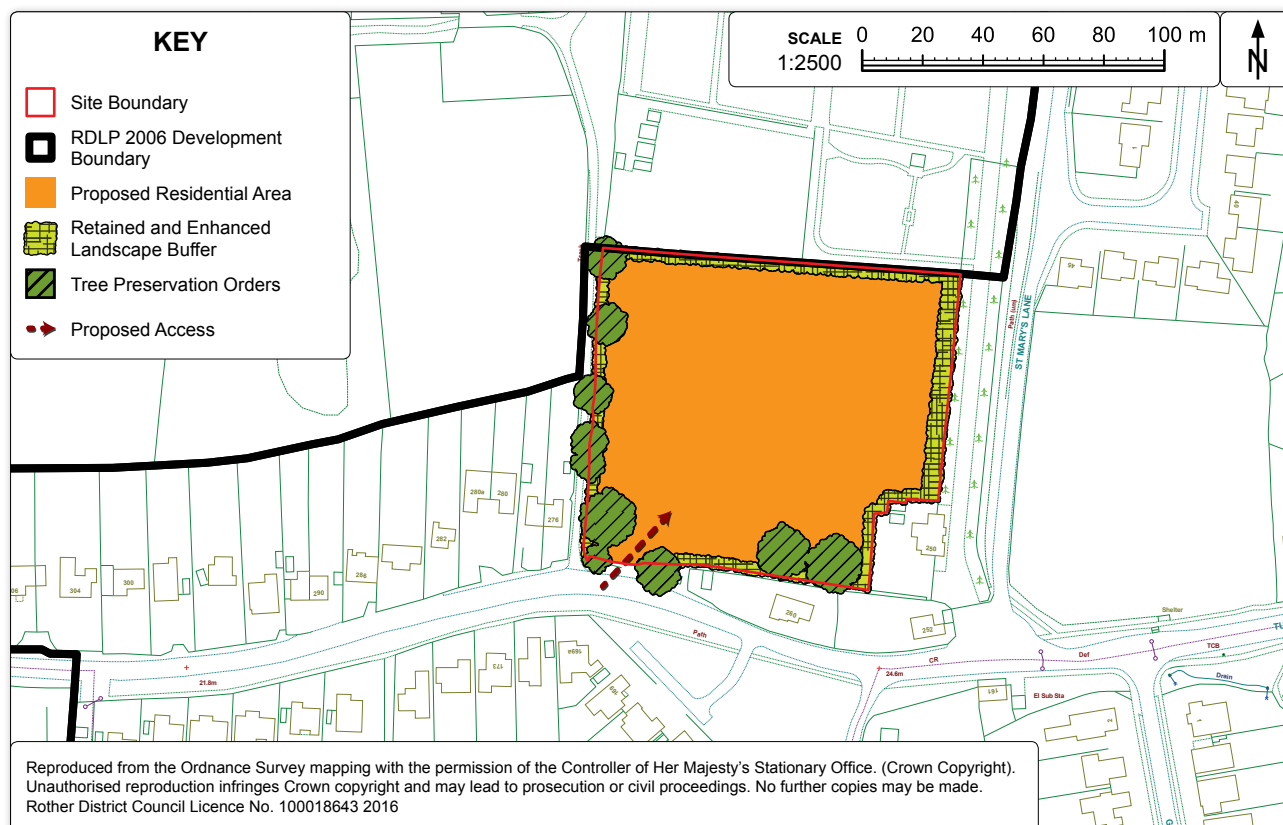
Existing use(s)	Field (disused).
Size	1.2ha
Key constraints/opportunities	<p>This greenfield site is located within the existing development boundary for Bexhill. There are three residential properties at the south-eastern corner of the site, with a further residential property along the western boundary. Bexhill Cemetery is to the east.</p> <p>The site received planning permission subject to a legal agreement in 2003 but the decision notice cannot be issued as the original company who put in the planning application no longer exists.</p> <p>The site was restricted for development due to Liquid Propane Gas tanks at Ashdown Brickworks. These have been removed, resulting in the Hazardous Substances consent lapsing.</p>

Key constraints/opportunities	<p>The site is partially contained from wider views by the boundary trees but there are more localised views due to the types of trees on the perimeter. There is an existing Tree Preservation Order (TPO - no.312) along western and southern boundaries. Development of the site would allow for boundary landscape improvements.</p> <p>The site is relatively well located in terms of access to some services (schools) and is close to existing bus routes, although there are not any footpaths immediately adjacent to the site (there are some on the opposite side of the road).</p> <p>There is no existing access point for the site, but the most likely access point is at the south-west corner of the site onto Turkey Road (in the same ownership). Highway improvements are likely to be required to make the development acceptable.</p> <p>The site is located within the Pevensey Levels Hydrological Catchment, with implications for SuDS treatments.</p>
Proposed use(s)	Residential.
Developable area	1.2ha
Capacity	30 dwellings.

Figure 31. BX30 Aerial Map



Figure 32. BX30 Detail Map



Policy BEX6: Land adjacent to Cemetery Lodge /276 Turkey Road, Bexhill

Land adjacent to Cemetery Lodge /276 Turkey Road, Bexhill, as shown on the Policies Map, is allocated for residential development. Proposals will be permitted where:

- (i) some 30 dwellings are provided, of which 30% are affordable;
- (ii) an appropriate access is provided onto Turkey Road; including any necessary off-site highway works necessary to make the development acceptable;
- (iii) provision is made for the retention and enhancement of boundary planting, particularly in relation to the existing Tree Preservation Order on the site; and
- (iv) in accordance with Policy DEN5 'Sustainable Drainage', at least two forms of appropriate SuDS are incorporated.

QUESTION 32: Do you agree with the requirements of Policy BEX6? If not, how would you wish to see it amended?

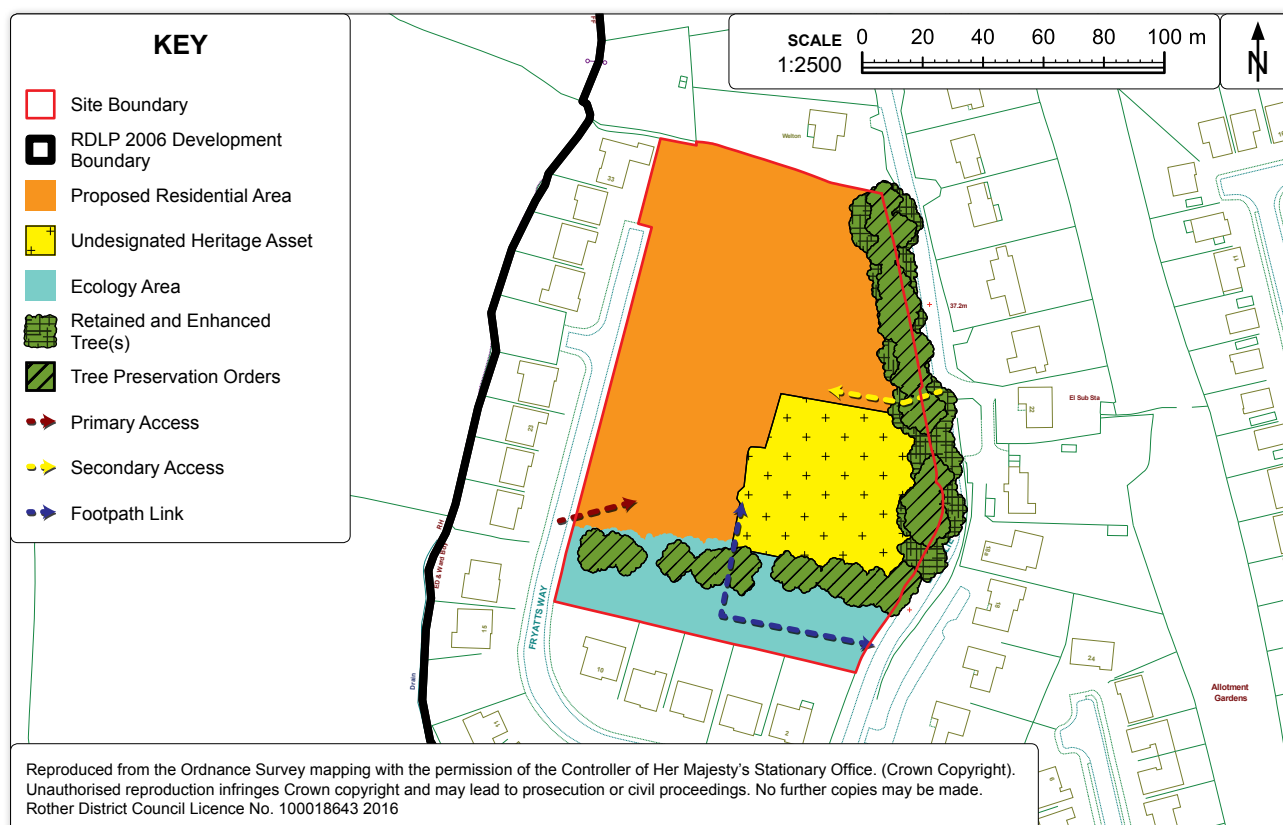
Preferred Site: Land at Moleynes Mead, Fryatts Way, Bexhill (Ref: BX64)

Existing use(s)	Residential with equestrian uses including stable, manège & paddock.
Size	1.6ha
Key constraints/opportunities	<p>The site is located within the development boundary and is relatively well screened from the wider countryside by existing residential development on all four sides (although there are some gaps to the west).</p> <p>The site is reasonably located in terms of access to services in line with Policies OSS4 and TR3. There is also a bus route within walking distance of the site. It is likely that a footpath link to Ellerslie Lane would be required to encourage a more direct walking route.</p> <p>The site is occupied by an existing dwelling (Moleynes Mead) which although not listed, is considered to be an undesignated heritage asset. It is therefore considered that any re-development of the site which involved in demolition of Moleynes Mead would not be acceptable.</p> <p>There is an existing access to Ellerslie Lane that is likely to require re-location and/or improvements for any redevelopment. There is also potential for an additional access from Fryatts Way.</p> <p>The site contains a number of mature trees and these contribute positively to the character of the area, any development should seek to retain them. The southern section of the site is separated from the wider site by an existing TPO and therefore this area is not considered appropriate as part of the developable area of the site.</p> <p>There are protected species on the site.</p> <p>In terms of planning history, two planning applications have been refused on this site (one also refused on appeal reference APP/U1430/W/14/3001671). Although the principle of development was considered acceptable on this site, reasons for refusal focused on poor design and layout and loss of a heritage asset.</p> <p>The site is located within the Pevensey Levels Hydrological Catchment, with implications for SuDS treatments.</p>
Proposed use(s)	Residential.
Developable area	0.9ha
Capacity	Some 22 dwellings (in addition with the retention of the existing dwelling on-site).

Figure 33. BX64 Aerial Map



Figure 34. BX64 Detail Map



Policy BEX7: Land at Moleynes Mead, Fryatts Way, Bexhill

Land at Moleynes Mead, Fryatts Way, Bexhill, as shown on the Policies Map, is allocated for residential development. Proposals will be permitted where:

- (i) some 22 dwellings are provided, of which 30% are affordable;
- (ii) the existing dwelling, Moleynes Mead, is retained;
- (iii) provision is made for the retention and enhancement of existing boundary planting, particularly in relation to the existing Tree Preservation Order on the site;
- (iv) the southern section of the site remains undeveloped as an ecology area;
- (v) a footpath link is provided through to Ellerslie Lane;
- (vi) an appropriate primary access is provided from Fryatts Way, with a potential secondary access from Ellerslie Lane; and
- (vii) in accordance with Policy DEN5 'Sustainable Drainage', at least two forms of appropriate SuDS are incorporated.

QUESTION 33: Do you agree with the requirements of Policy BEX7? If not, how would you wish to see it amended?

Preferred Site: Land south of Terminus Road, Bexhill (Ref: BX81)

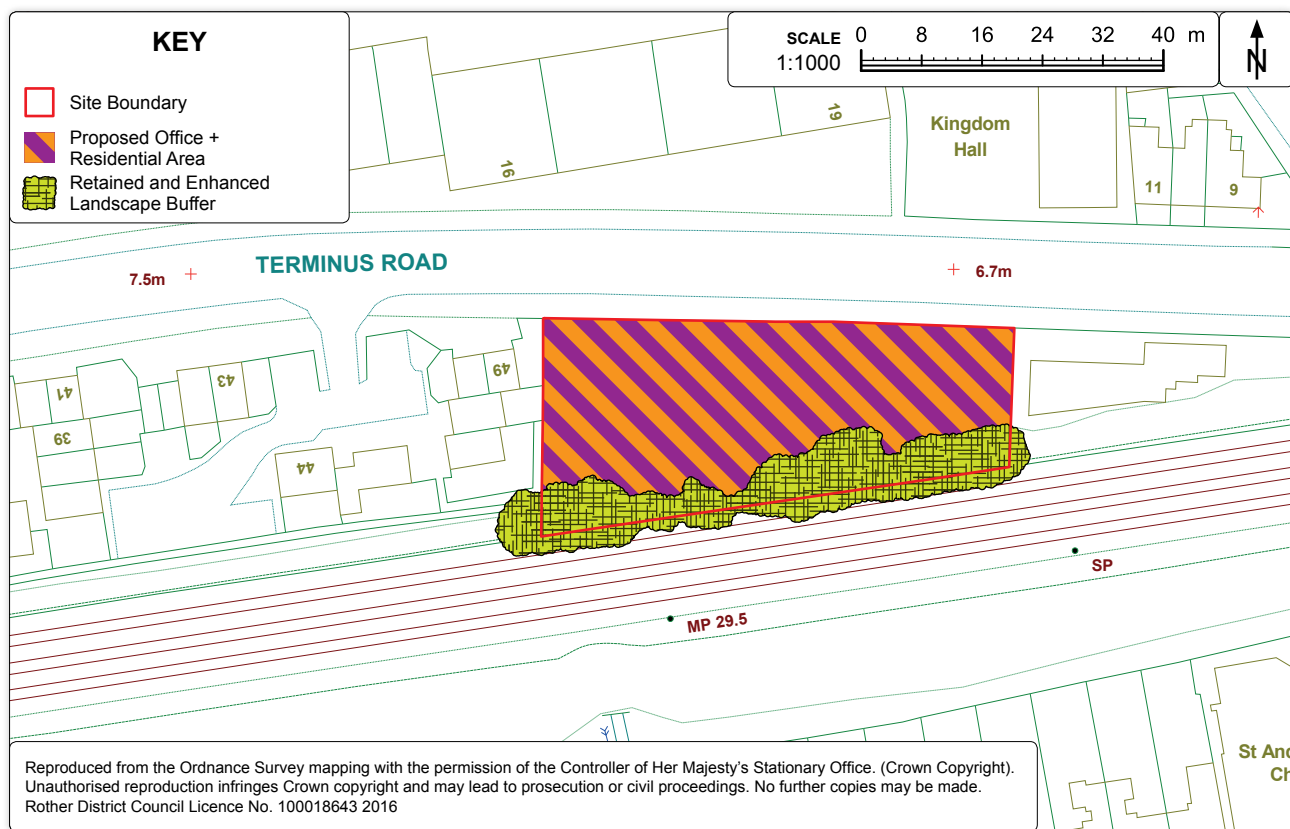
Existing use(s)	Car sales and car wash.
Size	0.15ha
Key constraints/opportunities	This is a site within the existing development boundary on an existing employment site (car sales/cash wash) site in Bexhill. The site is bounded by the railway line to the south, residential to the west and further offices to the east, with the Beeching Road industrial estate to the north. The site is an edge of the town centre location and is extremely well located in terms of its access to services.

Key constraints/ opportunities	The site currently occupied by a car sales and car wash business but would be well suited to a more intense business use such as offices given its proximity to the town centre (Policy BX2 refers). Retention of business use on this site is imperative given the proximity to the town centre and adjacent uses; although it is acknowledged that in order for this to come forward (and given previous, but expired planning permissions) some residential is likely to be needed to facilitate an office development.
Proposed use(s)	Residential and offices.
Developable area	0.15ha
Capacity	6 dwellings plus 100sqm B1 offices.

Figure 35. BX81 Aerial Map



Figure 36. BX81 Detail Map



Policy BEX8: Land south of Terminus Road

Land south of Terminus Road, as shown on the Policies Map, is allocated for residential development. Proposals will be permitted where:

- (i) some 100sqm of offices are provided;
- (ii) some 6 flats are provided; and
- (iii) appropriate boundary landscaping is provided.

QUESTION 34: Do you agree with the requirements of Policy BEX8? If not, how would you wish to see it amended?

Preferred Site: Land off Spindlewood Drive, Bexhill (Ref: BX116)

Existing use(s)	Grazing land.
Size	7.3ha
Key constraints/opportunities	<p>The site is adjacent to the development boundary of Bexhill, just south of Barnhorn Road/Spindlewood Drive, Little Common. It is relatively well contained from wider views by the adjacent wood (Cooden Wood), and this is important in containing any development at this location. The site levels are higher towards the existing residential development along Barnhorn Road, and any development will have to consider wider views.</p> <p>The Council's landscape assessment (2008) makes particular reference to the 'block of woodland and trees and hedges' to the west of this site that provide relative enclosure to this area and that this lends the area to some modest development. However, there is a gap with wider views to the Pevensey Levels from the adjacent (south-western) field (BX108). The adjacent Ancient Woodland to the west of the site is important in containing any potential development.</p> <p>There are two bands of trees that run through the site linking a wooded area to the north with Ancient Woodland to the south. This is an important feature and acts as a wildlife corridor between the two areas of woodland. There is a pond within this area which should be retained and enhanced. The area bounded by these trees should remain open and undeveloped as a wildlife corridor/open space feature of the area. Part of this area may be suitable for children's play space.</p> <p>There is a viable access point from Spindlewood Drive through an existing field gate and a recent transport assessment relating to highway capacity of adjoining roads by the landowner is considered acceptable by the Highway Authority.</p> <p>The site is relatively close to bus services on Barnhorn Road, but there is no current pedestrian route to access Barnhorn Road directly from the site. Any development should provide for a pedestrian route to Barnhorn Road.</p> <p>The site is relatively well located in terms of access to services.</p> <p>The site is located within the Pevensey Levels Hydrological Catchment, with implications for SuDS treatments.</p>
Proposed use(s)	Residential.
Developable area	4.8ha
Capacity	160 dwellings.

Figure 37. BX116 Aerial Map

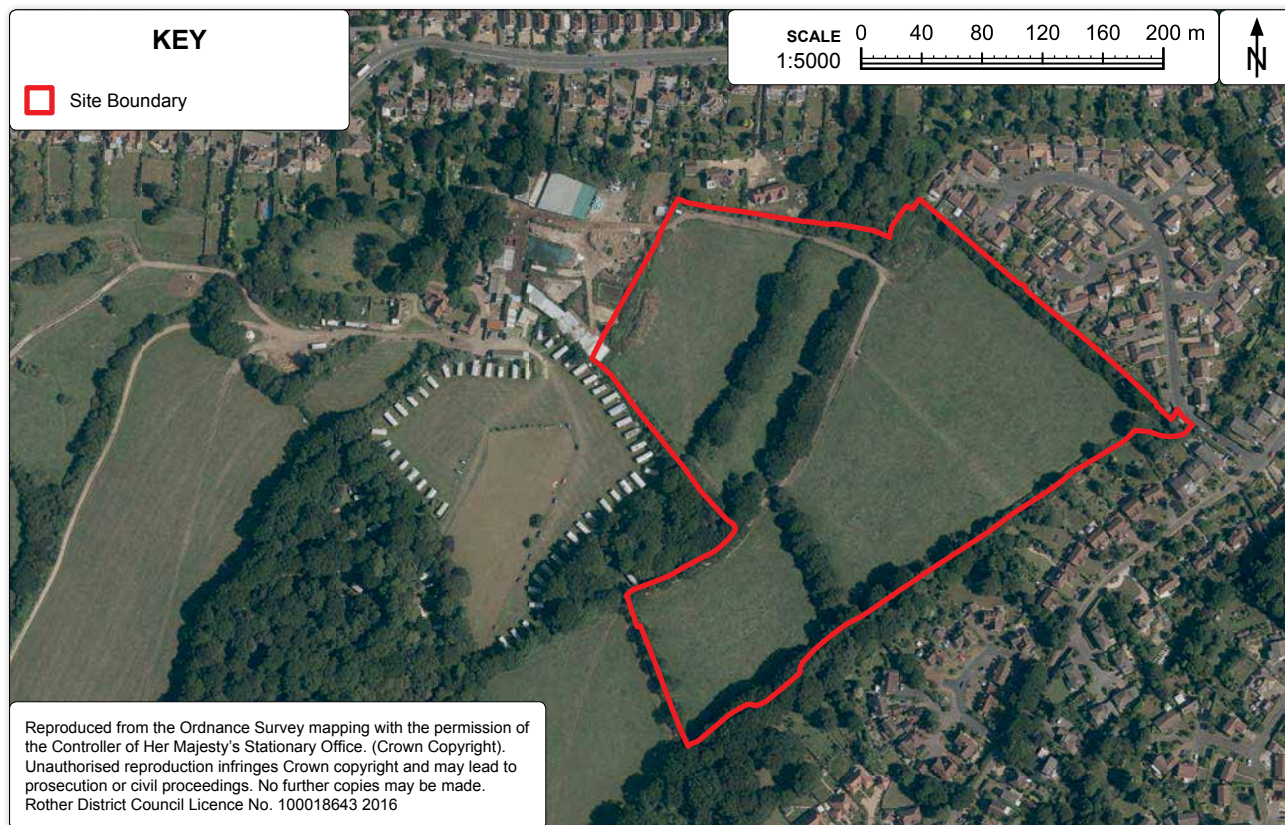
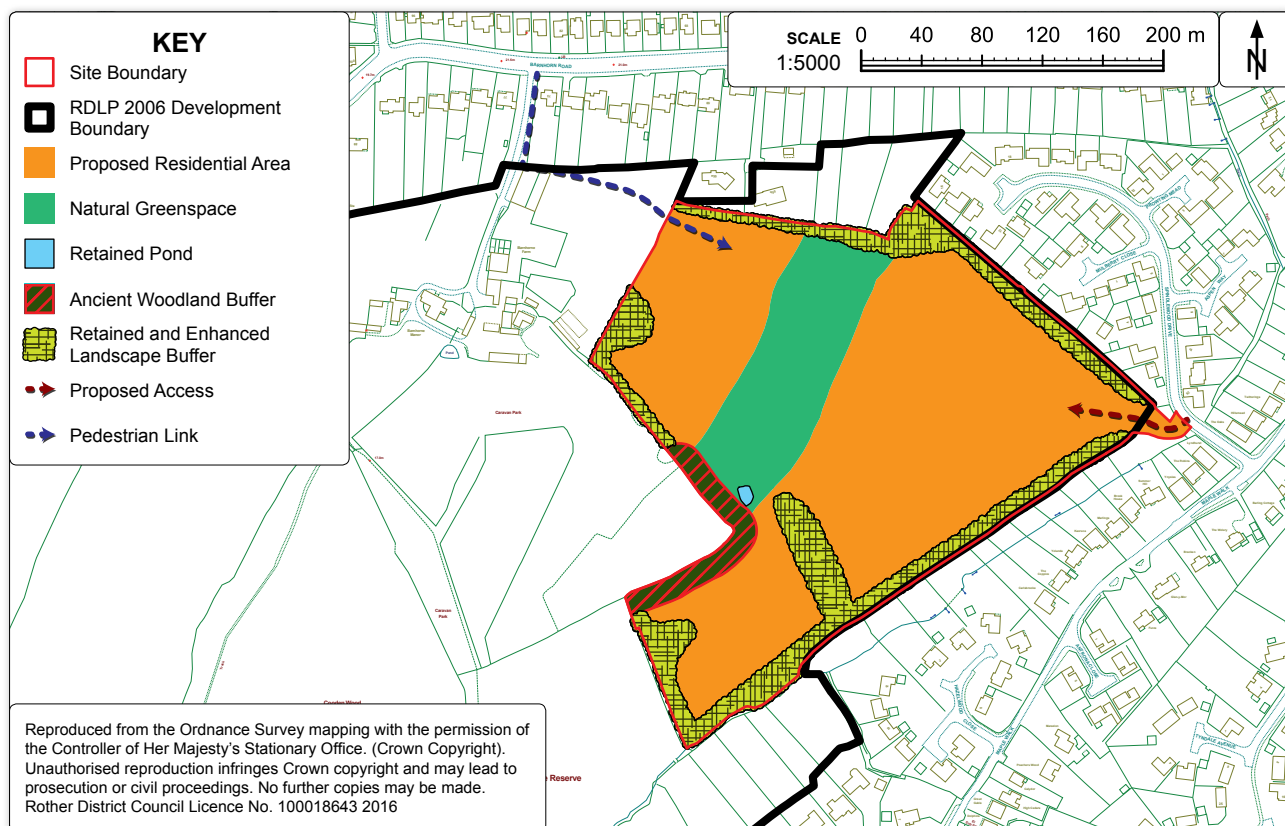


Figure 38. BX116 Detail Map



Policy BEX9 Land off Spindlewood Drive, Bexhill

Land off Spindlewood Drive, Bexhill, as shown on the Policies Map, is allocated for residential development. Proposals will be permitted where:

- (i) some 160 dwellings are provided, of which 30% are affordable;
- (ii) highway access is provided from Spindlewood Drive;
- (iii) a footpath link is provided through to Barnhorn Road;
- (iv) provision is made for the retention and enhancement of existing boundary planting, particularly in relation to the existing Tree Preservation Order on the site;
- (v) suitable provision is made for children's play space in the form of both a Locally Equipped Area for Play (LEAP) and a Local Area for Play (LAP);
- (vi) a green corridor is provided through the centre of the site between two areas of existing adjacent woodland areas, including the retention and enhancement of the existing pond;
- (vii) a woodland buffer is provided to protect the adjacent Ancient Woodland to the south-west of the site;
- (viii) provision is made for the retention and enhancement of existing boundary planting; and
- (ix) in accordance with Policy DEN5 'Sustainable Drainage', at least two forms of appropriate SuDS are incorporated.

Consideration should also be made to the provisions of Policy SRM1 with regards to a renewable energy strategy for the site.

QUESTION 35: Do you agree with the requirements of Policy BEX9? If not, how would you wish to see it amended?

Preferred Site: Land at Barnhorn Green (Ref: BX120)

Existing use(s)	Grazing land.
Size	3.53ha
Key constraints/ opportunities	<p>This site forms part of the Barnhorn Green area which has an extant outline planning permission for 275 dwellings, up to 3,500 sqm of employment floorspace, a nursing home, a doctors surgery, and a one form entry primary school, together with associated landscaping, drainage and highway infrastructure works. Recent discussion with East Sussex County Council has indicated that the area set aside for the primary school is no longer required.</p> <p>Generally the area is well enclosed and the strong tree structure affords opportunities for good mitigation of any potential development. These tree structures form a good basis for the development of defined neighbourhoods. The site is reasonably well located for access to local services at Little Common District centre.</p> <p>Development in this location requires a number of highway improvements along Barnhorn Road and to Little Common Roundabout in order to make the development acceptable (as part of the wider Barnhorn Green site).</p> <p>Low risk contamination was identified at the outline planning application stage for the wider site, and must be mitigated against as part of any development.</p> <p>Development should not increase flood risk (regulated outflow of water to Picknell Green Stream).</p> <p>There is an existing TPO (No.341) which runs through the site and are primarily located along the existing field boundaries.</p> <p>A number of Public Rights of Way (PRoW) run through/about the site (11a, 11b, 12a) and any development must ensure that these footpaths are maintained and enhanced.</p> <p>The site is located within the Pevensey Levels Hydrological Catchment, with implications for SuDS treatments.</p>
Proposed use(s)	Residential.
Developable area	2.84ha
Capacity	67 dwellings.

Figure 39. BX120 Aerial Map

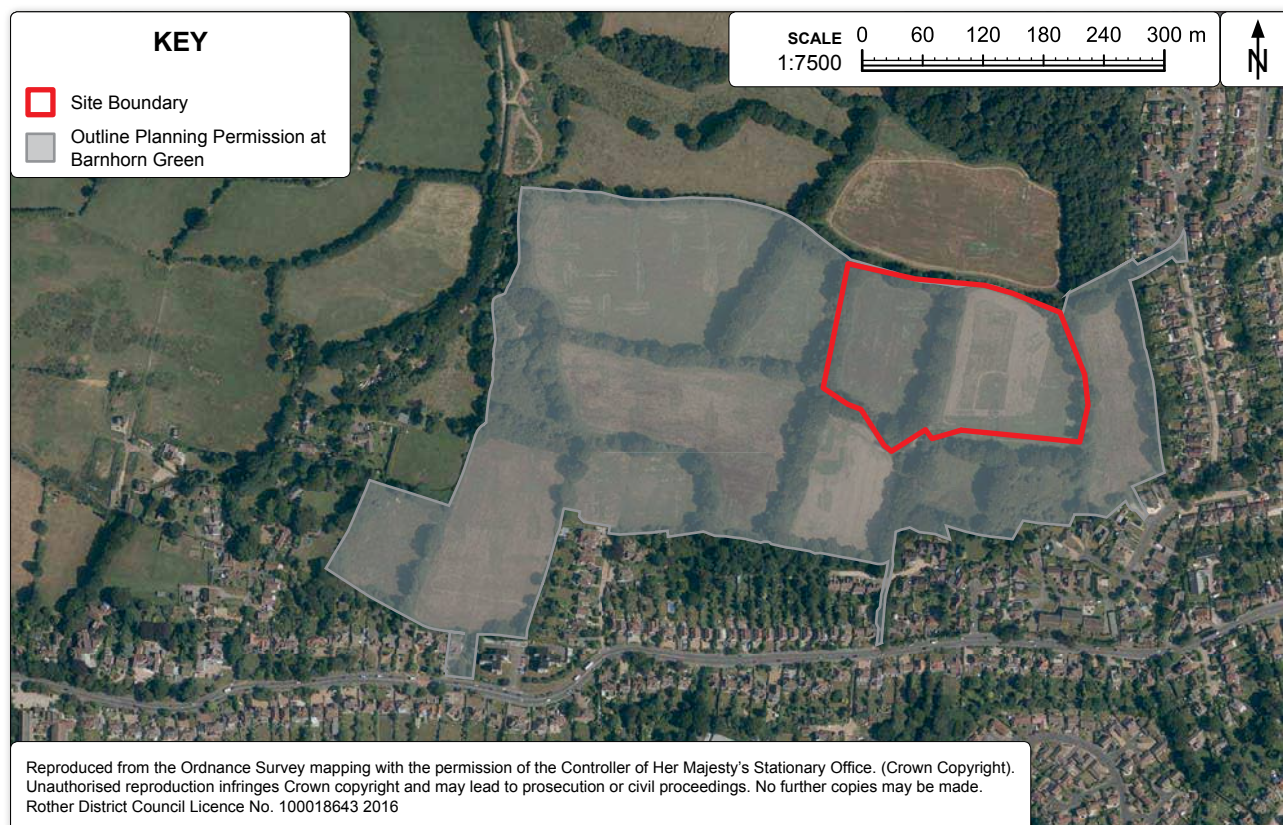
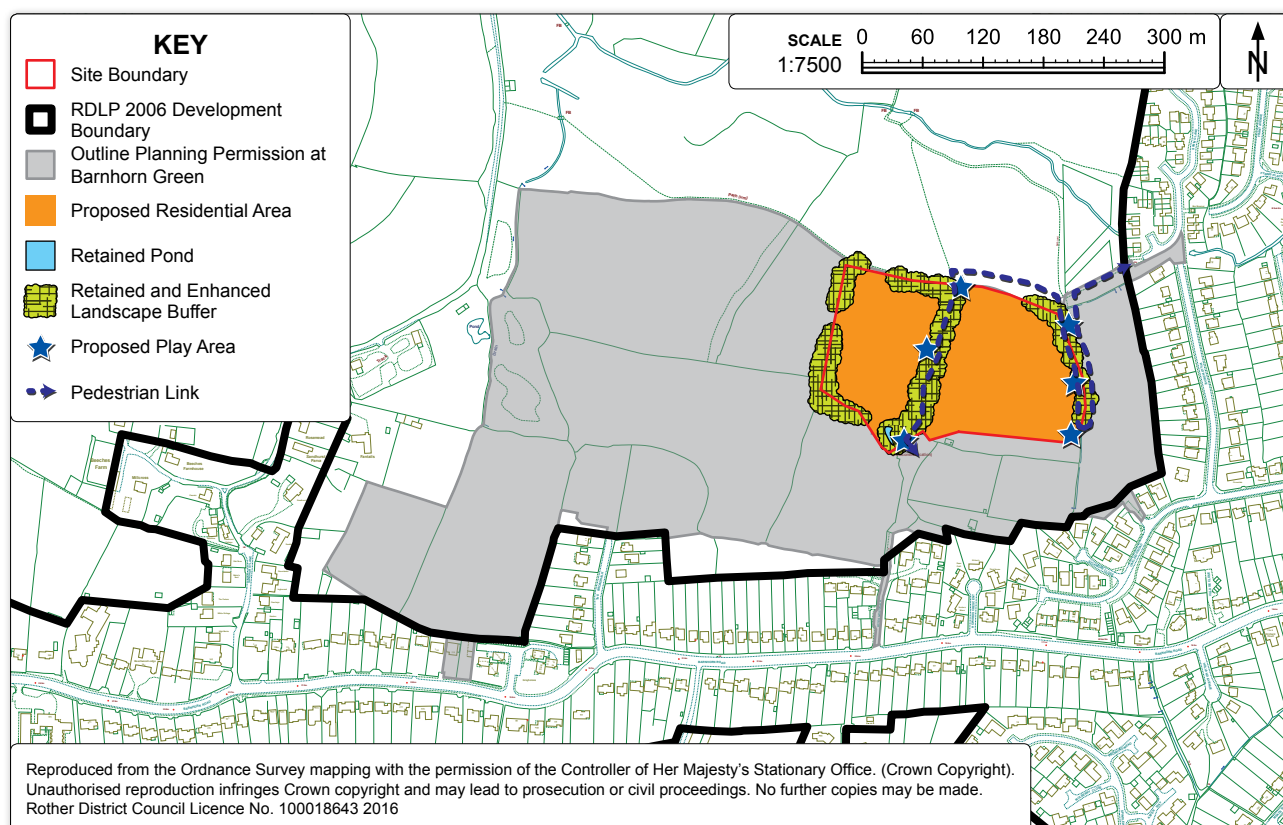


Figure 40. BX120 Detail Map



Policy BEX10: Land at Barnhorn Green, Bexhill

Land at Barnhorn Green, north of Barnhorn Road, Bexhill, as shown on the Policies Map, is allocated for residential development. Proposals will be permitted where:

- (i) some 67 dwellings are provided, of which 30% are affordable;
- (ii) the scheme is comprehensively integrated into the surrounding development;
- (iii) the existing footpath network is maintained and enhanced;
- (iv) provision is made for the retention and enhancement of existing field boundaries as green corridors, particularly in relation to the existing Tree Preservation Order on the site;
- (v) the existing pond is retained and where possible, enhanced;
- (vi) suitable provision is made for children's play space in the form of Locally Equipped Areas for Play (LEAPs) and a Local Areas for Play (LAPs); and
- (vii) in accordance with Policy DEN5 'Sustainable Drainage', at least two forms of appropriate SuDS are incorporated.

QUESTION 36: Do you agree with the requirements of Policy BEX10? If not, how would you wish to see it amended?

Preferred Site: Northeye (Former United Arab Emirates - Technical Training Project), Bexhill (Ref: BX101)

Context

- 13.25. This large site lies on a north-facing slope extending down to the edge of the Levels on the north side of the A259 a little beyond the western extent of Bexhill. Access is provided by Wartling Drive, served off Coneyburrow Lane, a short distance from its junction with the A259.
- 13.26. The site is owned by the United Arab Emirates, but its use as a Training Centre ceased some years ago and the site is presently mothballed. The owners advise that there is no intention to bring the site back into training use for its purposes. Hence, consideration should be given to alternative uses.

- 13.27. Of note, its somewhat exposed countryside location reflects the fact that the site was originally established as a RAF base in 1944 and then developed as a prison, which existed until 1992 before being taken over by the United Arab Emirates.
- 13.28. The total site area is approximately 15ha, with a variety of accommodation, education and operational buildings covering about 9ha. The remainder is open, with the northern part previously providing recreation fields for the Centre.
- 13.29. Alongside the approach to the site is the small residential estate off Wartling Drive. The last six houses on Wartling Drive are still part of the principal site, others having since been sold and now privately occupied. Otherwise, the setting is very rural in character.

Site Options

- 13.30. It is evident that this is a very sensitive site, most notably due to its position adjacent to an internationally-designated ecological site (the Pevensey Levels), its largely rural setting and associated visual exposure, as well as being somewhat isolated from the main built-up area of Bexhill. New development in such a situation would normally be resisted, but given the brownfield nature of a large part of the site, redevelopment of that area (excluding land that falls in Flood Zone 3) should be considered.
- 13.31. The countryside setting of the site, allied to its fairly self-contained nature, gives rise to a number of possible future uses. The scope of these and their pros and cons are summarised in Figure 41 below.
- 13.32. Common to all options is the proposal that the essentially undeveloped area of the site north of the stream course should remain open and not be built upon. In particular, this land offers an opportunity to provide additional playing fields, the need for which is identified in the recent Playing Pitch Strategy for Rother and Hastings. If recreational demand does not materialise, then the northern half of the site could return to an agricultural (or possibly low-intensity equestrian) use.
- 13.33. Also, in all cases, any development would need to be sympathetic to its sensitive location, both in terms of its impact on the Levels and in reducing the existing visual impact of existing buildings which are seen in the context of fields surrounding the site, particularly when viewing them from the west and the north.

Figure 41. Northeye site options

Option	Description	Commentary
1. Employment-led redevelopment	Some 11,000sqm business floorspace on the southern part of the site, contained by buffer planting on southern and south western edges, with playing pitch/open space on the northern half.	The site offers access to the trunk road and would suit a “campus” layout of R&D/offices/headquarters in landscaped grounds, providing valuable local jobs. Would need to improve A259 junction and to separate access from housing; slope may limit large-footprint buildings.
2. Residential-led redevelopment	Residential development of some 115 dwellings (including 30% affordable) on the southern part of the site, contained by buffer planting on southern and south-western edges, with playing pitch/open space uses on the northern half.	Compatible with adjoining housing to south. Layout could work with slope of land. Would be quite car-dependent, as few services nearby, although partially mitigated by bus route along A259. Would need to improve A259 junction.
3. Tourism-led redevelopment	A high quality (eco) holiday lodge park, potentially with a hotel. This would also be focused on the southern part of the site, contained by buffer planting on southern and south-western edges, with ancillary amenity open space and/or playing pitch on the northern half.	The size and rural fringe location of the site, coupled with good access to many tourism assets, may attract a high-quality holiday lodge operator, complementing existing accommodation and generally supporting the tourism sector. Buildings may be set within a well-landscape setting. Peak traffic flows would be relatively low. The costs of such a scheme on a brownfield site would be relatively high.
4. Institutional-led redevelopment	This would cover similar uses to those in the past i.e. secure residential/training accommodation, but would also allow for an educational establishment. The northern part of the site may be incorporated into such a use or used separately for playing pitch/open space purposes.	Such uses reflect both the past use of the site and its self-contained, rural fringe but still reasonably accessible location. Different institutional uses may raise specific issues, but traffic generation is likely to be relatively low. Such uses would have relatively little connection with the needs of Bexhill, although would provide some employment.

QUESTION 37: Which of the development options for Northeye do you prefer? Should other options be considered?

Figure 42. Northeye Aerial Map

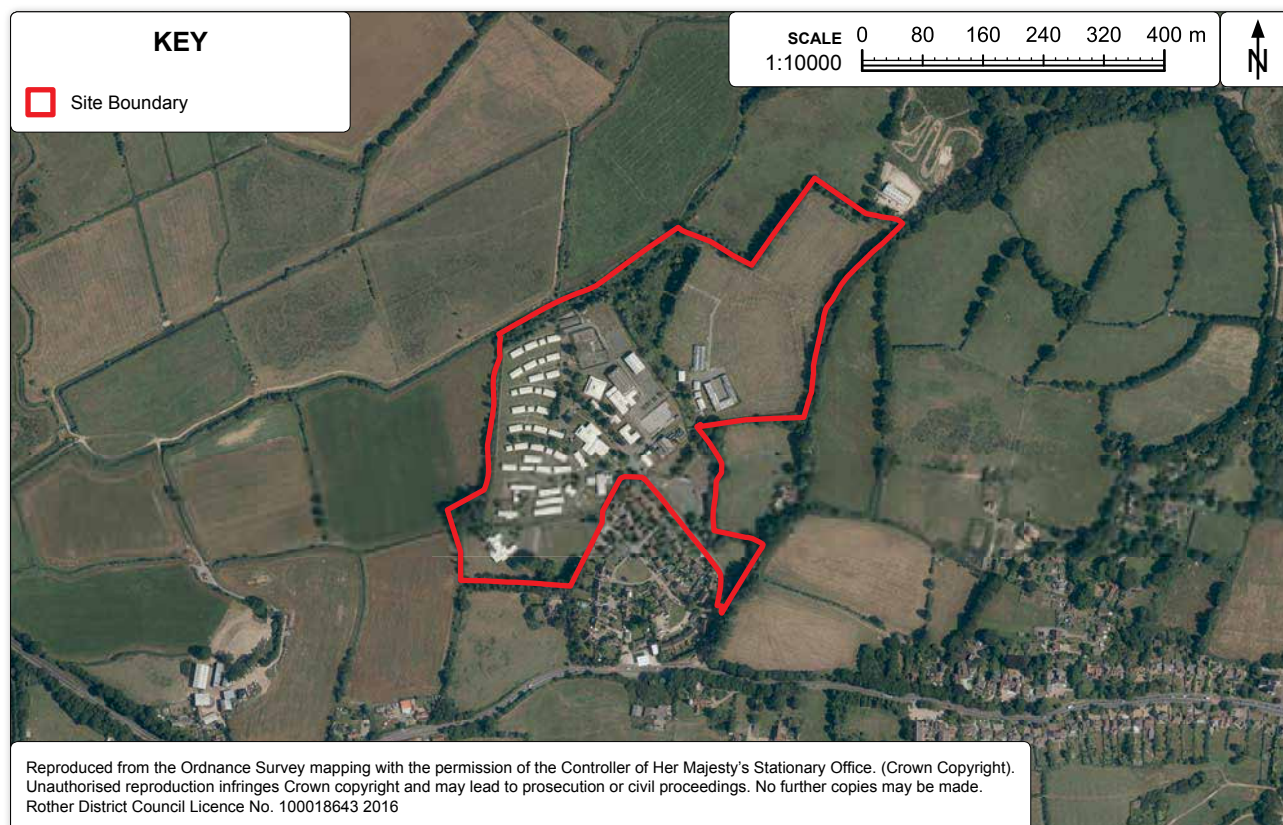
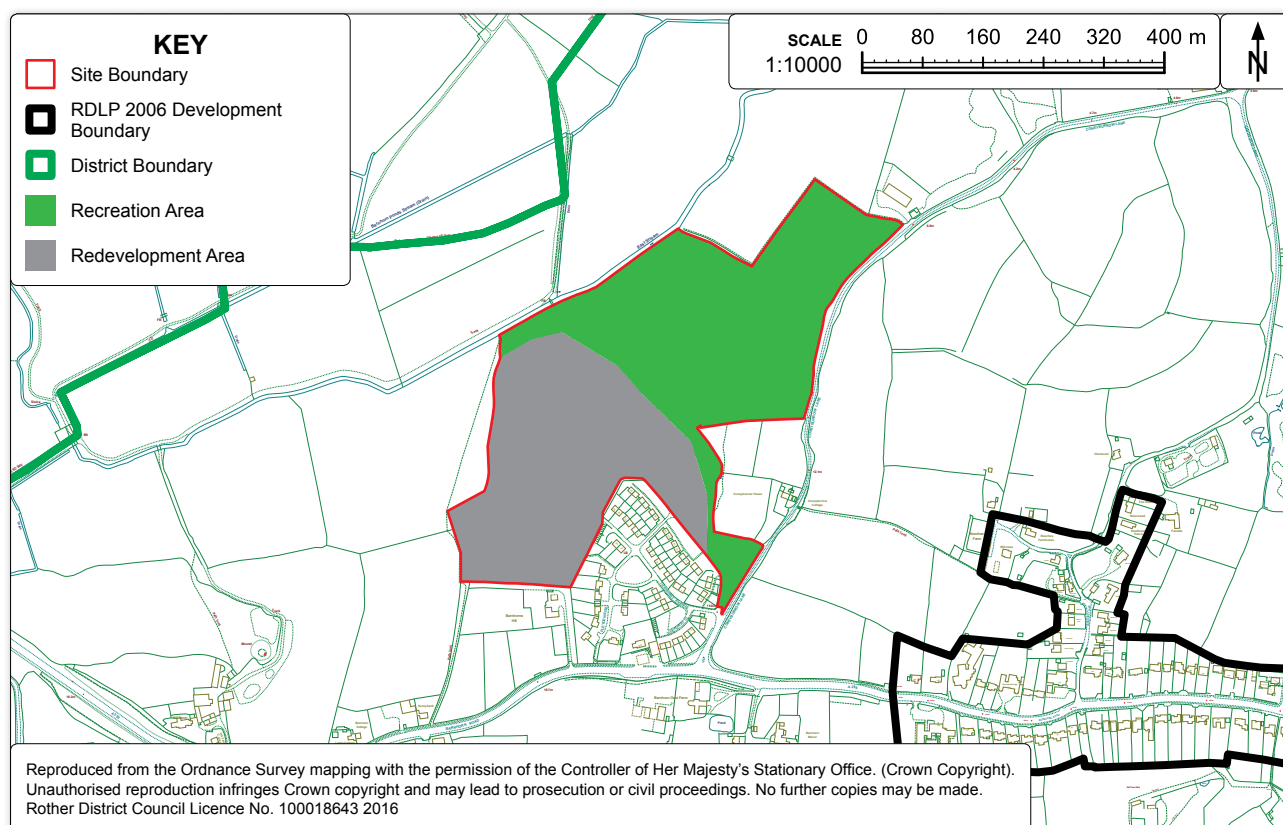


Figure 43. Northeye Detail Map



Site options for playing pitches

- 13.34. The Council's Playing Pitch Strategy assesses existing pitch provision and is a demand led assessment. It also provides a strategic framework for the maintenance and improvement of existing playing pitches and ancillary facilities up to 2028. It covers the sports of football, rugby, cricket, hockey, artificial grass pitches, tennis, outdoor bowls, stoolball and American football.
- 13.35. The Strategy identifies where new provision is needed and how future provision of playing pitches should be secured. It also includes an Action Plan which identifies any surpluses or deficiencies in playing pitch provision and recommends actions relating to individual sites that are identified as having issues e.g. the pitch is overplayed, is of poor quality or changing facilities are required.
- 13.36. The Strategy highlights specific deficits in both football and rugby pitches and the need for two artificial grass pitches across the district. The Strategy indicates that the deficit of football pitches, in terms of match equivalents is particularly acute in Bexhill. In addition to this identified shortfall, there are a number of Bexhill based clubs who require enclosed pitches to progress through the football league structure.
- 13.37. It is envisaged that some of the shortfall in pitches would likely come through pitch condition improvements, it is clear that additional sites will be needed to address the shortfall, particularly in Bexhill.
- 13.38. As such, it is imperative that existing facilities are safeguarded but also new sites are found/previously used sites are brought back into use. The Strategy specifically highlights the need to safeguard existing sites (Core Strategy Policy CO3) and bring disused sites back into use.
- 13.39. Options for new sites within Bexhill for new playing pitches are limited due to the availability of land and the topography of the town. Therefore, the most likely option for additional playing pitches is to bring back former playing pitches into use. Policy BEX3 (North Bexhill) & Site BX101 (Northeys) highlight potential new provision alongside large scale development. The Strategy recommends that the former Sidley Sports and Social Club site which ceased its current use in 2013 should be safeguarded for playing pitch provision and brought back into use.
- 13.40. The former Sidley Sport and Social Club site is a two hectare site in the centre of Sidley which previously accommodated a full size adult football pitch and a full size cricket pitch. The sports clubs which were displaced have struggled to find alternative pitches to accommodate their games, with both the cricket and football clubs now playing at pitches outside Bexhill.

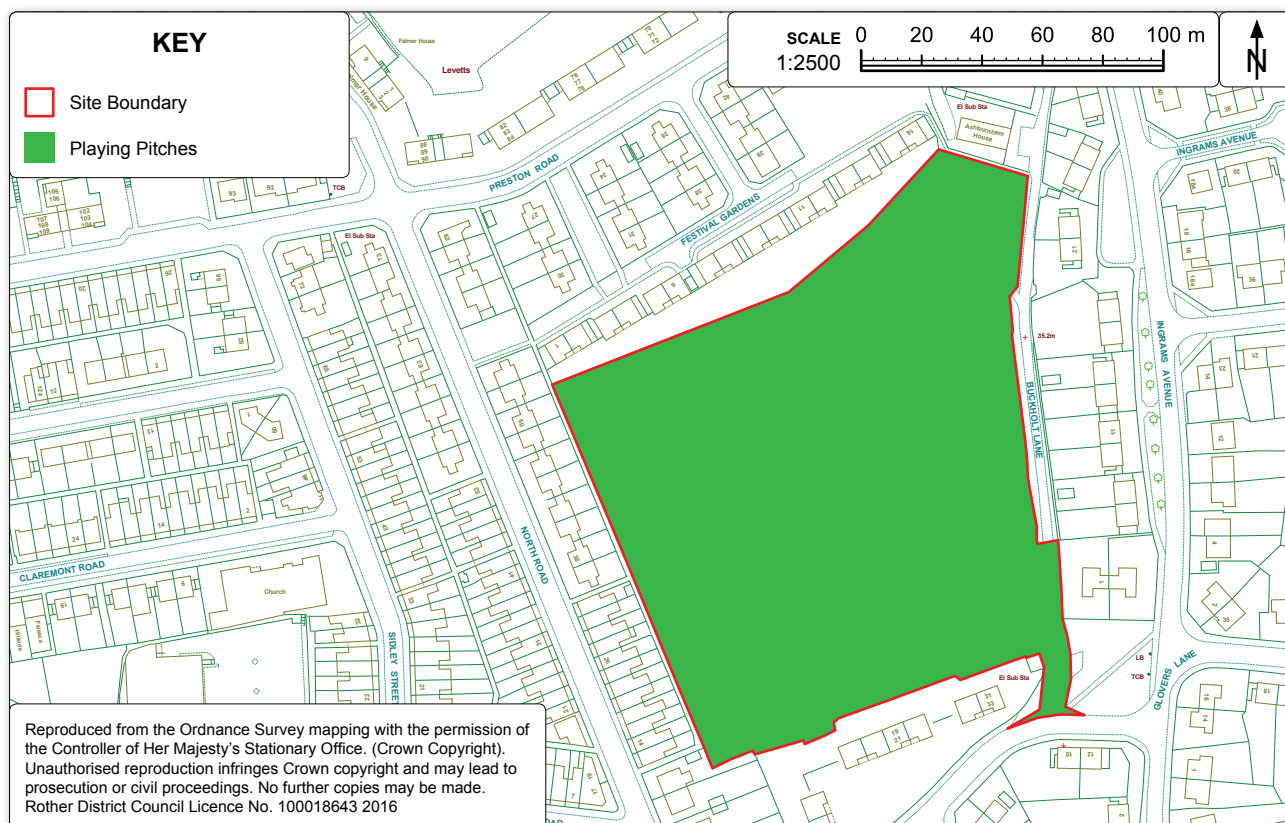
Preferred Site: Land at Sidley Sports and Social Club, Bexhill (Ref: BX123)

Existing use(s)	Disused football and cricket pitches and clubhouse.
Size	2.0ha
Key constraints/opportunities	<p>The application site comprises a 2ha area of grassed, open space formerly used as a playing field accommodating a full size adult football pitch and a full size cricket pitch.</p> <p>The site is currently in private ownership.</p> <p>The site is located within the Development Boundary.</p> <p>It is bordered by the rear gardens of houses on North Road on its western side and bungalows at Festival Gardens on its northern side. On its southern side are flats on Glovers Lane. Buckholt Lane, a public right of way, borders the eastern side of the site and there are houses on Ingrams Avenue on the opposite side of the Lane. The site is about 80m from Sidley's main shopping area which is focused around Ninfield Road to the south-west of the site.</p> <p>The southern part of the site is relatively level but the northern part slopes gently upwards towards its northern boundary.</p> <p>The site is largely covered with long grass and there are some mature trees on its boundaries.</p>
Proposed use(s)	Playing pitch/es.
Developable area	2ha
Capacity	One adult football pitch, with potential for additional pitch marking for smaller pitches.

Figure 44. BX123 Aerial Map



Figure 45. BX123 Detail Map



Policy BEX11: Land at Sidley Sports and Social Club, Bexhill

Sidley Sports and Social Club, Glovers Lane, as shown on the Policies Map, is allocated for playing pitches for formal sport.

QUESTION 38: Do you agree with the requirements of Policy BEX11? If not, how would you wish to see it amended?

Bexhill Town Centre

- 13.41. The Core Strategy identifies the hierarchy of shopping centres in the District and sets out a generic policy approach for the relative growth of these areas, as well as for retail development elsewhere.
- 13.42. The Council wishes to see the town centre build on its position as the commercial and cultural heart of the District. This includes building on its considerable strengths in the mix of land uses and strong architectural and historic character to support regeneration, create a more vibrant shopping environment and better integration between key facilities including between the seafront and the town centre.
- 13.43. Bexhill's many small independent shops help lend the town centre its special character. These small independent shops provide an important role in servicing the day-to-day needs of local residents, workers and visitors and can provide consumer choice and local employment. The Core Strategy highlights the retail role of Bexhill and the retail investment potential within the town through Policy BX2.
- 13.44. An allocation of land for a significant retail development is set out below. Other smaller sites may come forward for redevelopment or intensification within the designated town centre. Such sites and premises will be favourably considered for retail use in accordance with Policy EC7 in the Core Strategy.
- 13.45. Improved accessibility and public realm will be key to strengthening the town centres' position, and a town centre traffic management strategy is envisaged. This strategy will be prepared in conjunction with East Sussex County Council and will articulate a cohesive approach to town centre traffic movement, connectivity and the public realm, including the management thereof, and focus on some potential interventions that could deliver improvements. It will recognise the relationship between traffic management, connectivity and the public realm with the wider vitality and viability of the Town Centre, and make recommendations that will seek to strengthen one via the other. The strategy will be expected to encompass sustainable transport initiatives, accessibility of the town for cars, pedestrians, cyclists and public transport, traffic management within the town centre, including car-parking provision and location, and the potential for 20mph zones and pedestrian zones, and public realm design, management and maintenance. A draft of such a strategy will be subject to consultation in due course.

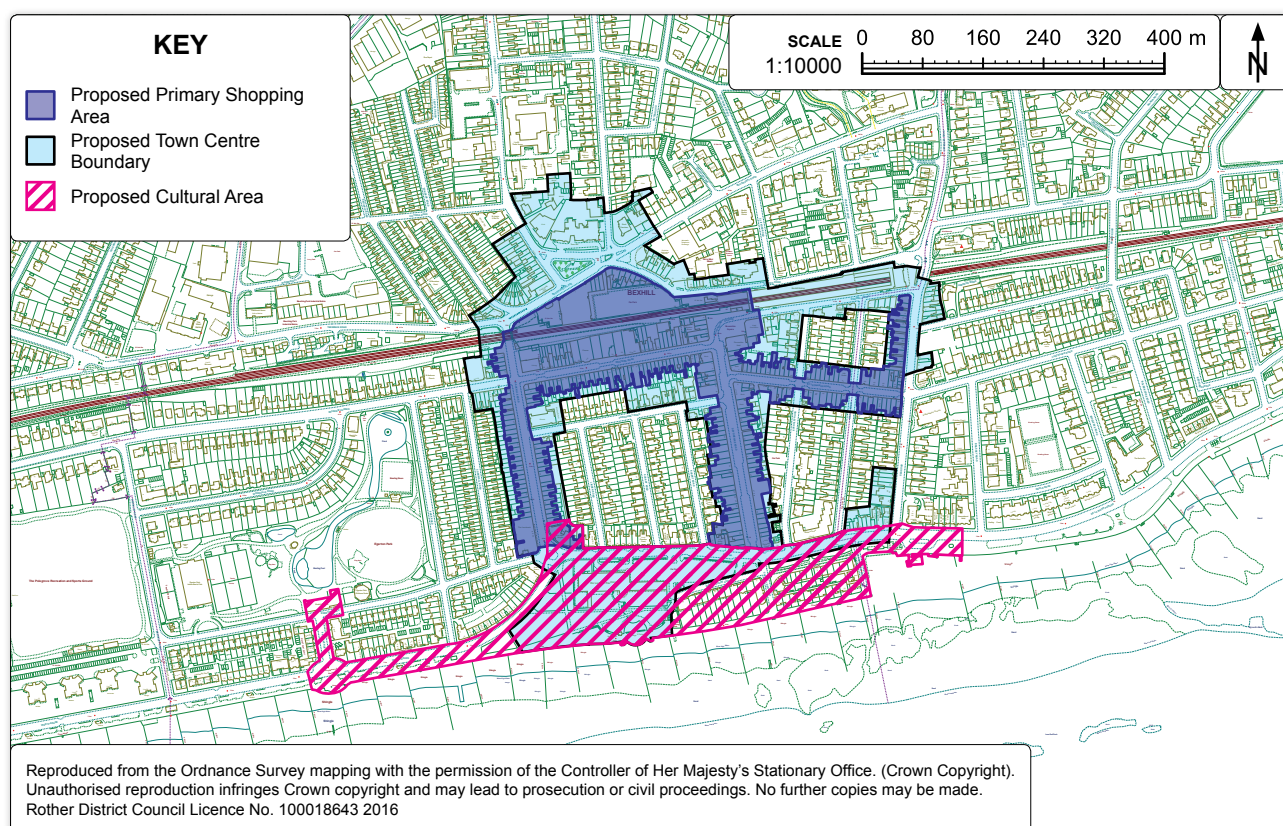
- 13.46. The arts and cultural offer in Bexhill is centred round the De La Warr Pavilion – a Grade I listed building which is internationally renowned for art installations and venue for live music and the arts. To the south lies the recently restored Grade II listed Colonnade, and the Bexhill Rowing Club, to the east the Grade II listed terrace of residential properties Marina Court Avenue, then Marina Arcade, a mixture of commercial and residential, and lastly Bexhill Sailing Club and the war memorial. Meanwhile the recently refurbished West Parade leads away from the Pavilion to Bexhill Museum to the west. The De La Warr Pavilion and its surrounding area is seen as a significant asset and hub for cultural and social activity within the town, being the focal point for events such as the ‘Roaring 20’s’, ‘Bexhill Festival of the Sea’ and ‘Bexhill Motofest’ and being critical in not only providing local amenity but also attracting visitors from further afield.
- 13.47. The District centres of Little Common and Sidley also form an important function in fulfilling day-to-day shopping needs to local communities. They were defined in the 2006 Local Plan. Their function and physical extents are detailed further below.

Bexhill Town Centre and Cultural Area

- 13.48. Bexhill’s ‘shopping centres’ in the Core Strategy follow a hierarchy with Bexhill being the town centre, and District Centres being Little Common and Sidley. A variety of ‘Town Centre’ uses are directed to these centres, Policy BX2 in the Core Strategy sets out this approach. However, this policy does not define the boundary of the town centre.
- 13.49. The 2006 Local Plan Proposals Map makes specific provision for a shopping area and office area within Bexhill town centre, highlighting areas for the focus of retail and office uses respectively. The National Planning Policy Framework indicates a differing approach which focussed on town centres and primary shopping areas¹, which should be defined on the Policies Map.
- 13.50. The town centre is the most sustainable location for retail investment with good accessibility by a range of means of travel. With the primary shopping area being the main concentration of retailing and associated high street uses. The purpose in identifying the primary shopping area is to support the primary retail function of the town centre.
- 13.51. Meanwhile the designation of a ‘cultural area’ affords the opportunity to focus the enhancement of the activity and facility offer to improve patronage and evening economy around the seafront as a significant amenity asset to the town.
- 13.52. The proposed town centre, primary shopping area and cultural area boundaries are shown in Figure 46 below.

¹ Defined area where retail development is concentrated – NPPF, March 2012

Figure 46. Proposed Bexhill town centre, primary shopping area and cultural area boundaries



Policy BEX12: Bexhill Town Centre

Bexhill Town Centre is defined on the Policies Map, and this will be the focus for retail and other town centre uses.

Within the town centre, as defined on the Policies Map, the loss of significant town centre uses will be resisted.

Public realm improvements and traffic management to support better access within the town centre and improved environmental quality and appearance will be supported.

QUESTION 39: Do you agree with the requirements of Policy BEX12, including the proposed town centre boundary as defined in Figure 46? If not, how would you wish to see it amended?

Policy BEX13: Bexhill Primary Shopping Area

The Bexhill Primary Shopping Area, as defined on the Policies Map, gives priority to retail and associated services (A1 and A2 uses) and seeks to protect the predominant shopping role and character of the area by controlling the loss of such units.

Planning permission will be granted for the introduction of new shops and the expansion or refurbishment of existing premises, subject to compatibility with other Plan policies.

In schemes for the redevelopment and change of use of sites within this area, regard will be made to the following factors:

- (i) whether there is harm to the shopping character, diversity and vitality of the area;
- (ii) the size and type of unit. The provision of new and retention of larger retail units will be encouraged;
- (iii) the type and characteristics of other uses in proximity to the application site; and
- (iv) the need to avoid an over concentration or clustering of non-retail uses.

Consideration should also be made to Policy DEC1 Shopfronts.

QUESTION 40: Do you agree with the requirements of Policy BEX13, including the proposed primary shopping area boundary as defined in Figure 46? If not, how would you wish to see it amended?

Policy BEX14: Bexhill Cultural Area

Bexhill Cultural Area is defined on the Policies Map, and will be the primary focus for arts, culture and tourism activities within the town. Within the cultural area, as defined on the Policies Map, the loss of significant existing arts, culture and tourism uses will be resisted.

Improvements to the quality of the public realm to complement the arts, culture and tourism offer, to improve the quality of the promenade experience, to strengthen connections between the beach and the town, and create a sense of place in keeping with the destination role of the seafront will be supported.

Facade restoration to reinstate the original architectural features at Marina Arcade will be supported, subject to compatibility with other Plan policies.

Additional infrastructure, including high quality visitor accommodation, to support cultural activity and facility offer in close proximity to the Cultural Area will be encouraged, subject to compatibility with other Local Plan policies.

QUESTION 41: Do you agree with the requirements of Policy BEX14, including the proposed cultural area boundary as defined in Figure 46? If not, how would you wish to see it amended?

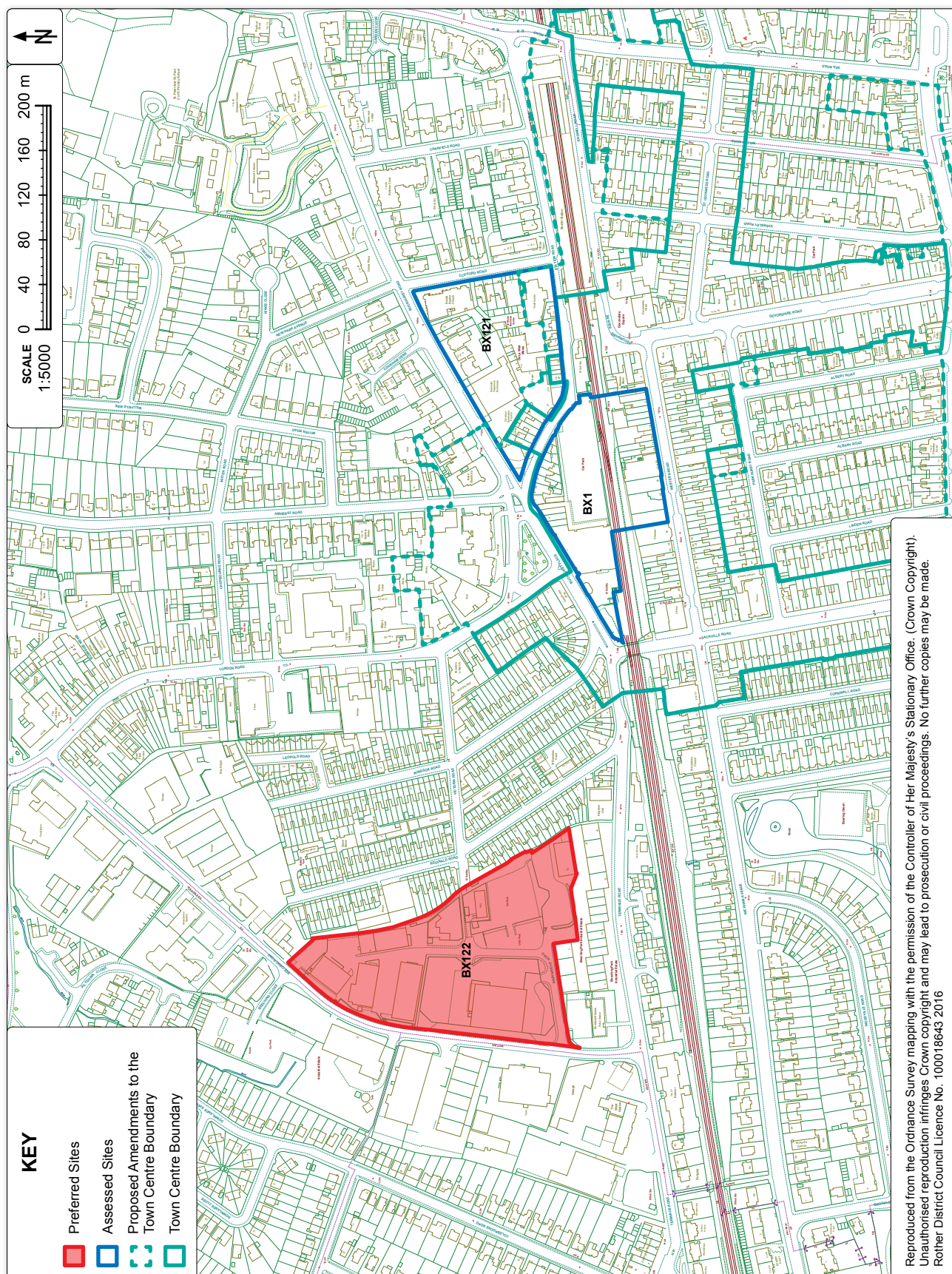
Site options for retail

- 13.53. In line with national planning policy and the Core Strategy (Policies BX2 and EC7), it is important that Bexhill town centre is the focus of both convenience and comparison retail growth. The Council is committed to supporting and promoting Bexhill town centre including enhancing the diversity of the retail offer by taking a pro-active approach in directing and encouraging growth. Because of its accessibility, Bexhill town centre is considered as a sustainable place suitable for the provision of a wide range of shopping facilities and services.
- 13.54. Given that Bexhill town centre is vital for the well-being of the local residents and faces stiff competition from nearby town centres, it is important that Bexhill town centre is promoted and developed in a way that allows it to strengthen its local distinctiveness, whilst also offering improved and enhanced consumer choice. The Council will therefore require applications for main town centre uses to be located in the designated centres, then in edge-of-centre locations and only if suitable sites are not available would out-of-centre sites be considered as set out in Policy EC7 in the Core Strategy. When considering edge-of-centre and out-of-centre proposals, preference would be given to accessible sites that are well connected to the town centre, and to proposals which satisfy the sequential test and are not likely to have significant adverse impact on the vitality and viability of the town centre.
- 13.55. The Council will apply a sequential test and impact assessment to planning applications for main town centre uses that are not located in the existing designated centres above 500sqm as set out in Policy EC7 in the Core Strategy.
- 13.56. Policy BX2 in the Core Strategy identifies the strategy for Bexhill town centre and seeks to “provide for some 2,000sqm additional convenience goods and 4,000sqm comparison goods floorspace, primarily through ‘edge of centre’ retail expansion on the north side of the railway, as well as effective use of town centre accommodation”.
- 13.57. There are three sites considered as potential locations for the identified retail need within Bexhill. These sites considered as potential retail sites can be identified on Figure 47 below.
- 13.58. The sites are located in edge of town centre locations on the north side of the railway, within an area from Sea Road through to Terminus Road, including the southern end of Beeching Road, in line with the provisions of Policy BX2 in the Core Strategy. The sites considered are:
- BX1: Sainsburys/Station Road/De La Warr Mews/Clifford Road/Buckhurst Road
BX121: Land adjacent to Station Road
BX122: Land on the southern end of Beeching Road industrial estate
- 13.59. The preferred development site for retail is:
- BX122: Land on the southern end of Beeching Road industrial estate

- 13.60. The 2006 Local Plan policy which identified a mixed-use redevelopment proposal on the existing Sainsburys site and related redevelopment along Western Road (Policy BX6) has not come forward over the Plan period. There has been no recent market interest regarding this site and redevelopment of this area is unlikely to be viable. The assimilation of land to bring the site forward would rely on a large number of landowners; therefore it is not possible to consider the site as available for development. Hence, it is not appropriate to maintain this allocation forward.
- 13.61. Given the historic character, mix of ownerships and already intensive use within the town centre, it is highly unlikely that there is a large scale opportunity for redevelopment to accommodate the level of convenience goods floorspace identified within the Core Strategy for Bexhill. Therefore, the Council must apply the sequential test in the consideration of sites to accommodate the floorspace, by firstly looking at edge-of-centre sites (i.e. within 300 metres of the town centre boundary) and, if necessary, out-of-centre sites with good links to the town centre.
- 13.62. For similar reasons to site BX1, land adjacent to Station Road is also a challenging site, primarily due to the large number of landowner/interests within this area and it is not possible to consider the site as available for development.
- 13.63. The preferred retail site is the only edge of centre site which can be considered available. Work undertaken for the Council by GL Hearn in 2013, considered a number of sites in terms of suitability to accommodate convenience goods retail floorspace and their location in proximity to the town centre. This identifies an edge-of-centre site on the southern end of Beeching Road. The centre of this area is within the 300m threshold to be considered edge of centre. The route from the edge of the town centre is relatively flat and there are no major roads or railway lines to cross, meaning that there are not obstacles which would hinder the scope for linked trips with the town centre. Even so, achieving linked trips needs an attractive and safe pedestrian link from the site (likely utilising the existing pedestrian footpath), and along Terminus Road towards the town centre.
- 13.64. A clear frontage on Terminus Road would be a desirable outcome, but the scope to achieve this may be unviable. This is the only available edge of centre site and is capable of achieving attractive town centre linkages.
- 13.65. The location of the store car park is likely to be a key factor in promoting linked trips with Bexhill town centre. Therefore, it is likely that the car park for a retail store would be best located towards the Terminus Road end of Beeching Road, although the route to walk through the car park to the store entrance will also need to be safe and well managed.

QUESTION 42: Do you agree with the preferred site for retail development at Bexhill? If not, which site(s) should be preferred?

Figure 47. Retail Options Map



Preferred Site: Land south east of Beeching Road, Bexhill (Ref: BX122)

Existing use(s)	Existing employment estate.
Size	2.7ha
Key constraints/opportunities	<p>BX122 is located on the south-eastern end of Beeching Road and comprises of a mix of uses, predominantly employment uses but with some large vacancies. Mixture of large format warehouse buildings and smaller terraces of start-up type units. There is an existing public car park and coach/lorry park within the area. There is also a Police Station, scout hut and veterinary surgery adjacent to the area. With predominantly two-storey residential properties along the eastern boundary (Reginald Road).</p> <p>There are significant level differences across the site, falling from Beeching Road in the west towards the eastern boundary. There is a culvert which runs through the site. A large proportion of the site suffers from surface water flooding.</p> <p>The centre of the site is located within 300m of the Bexhill town centre boundary, which is likely to be considered edge-of-centre (in sequential test terms) provided there is a clear and unimpeded pedestrian route between the site and the town centre.</p> <p>There is an existing footpath along the eastern boundary of the site joining Terminus Road with Wainwright Road, but it is narrow, unmade and uninviting.</p> <p>There is an existing public car park and coach and lorry park within the site which would require appropriate reprovision within the site or elsewhere.</p> <p>There is no existing pedestrian crossing across Terminus Road between Beeching Road and Sackville Road/Buckhurst Place.</p> <p>Redevelopment of this area would involve the redevelopment of part of an existing industrial estate which would result in the net loss of employment floorspace. This may be mitigated by the provision of office space within a retail-led redevelopment.</p> <p>The freehold of the land is in one ownership but there are multiple leases and sub-leases. There has been some consolidation of leasehold ownerships in recent years.</p>
Proposed use(s)	Retail (convenience goods).
Developable area	2.7ha
Capacity	2,000sqm convenience goods floorspace.

Figure 48. BX122 Aerial Map

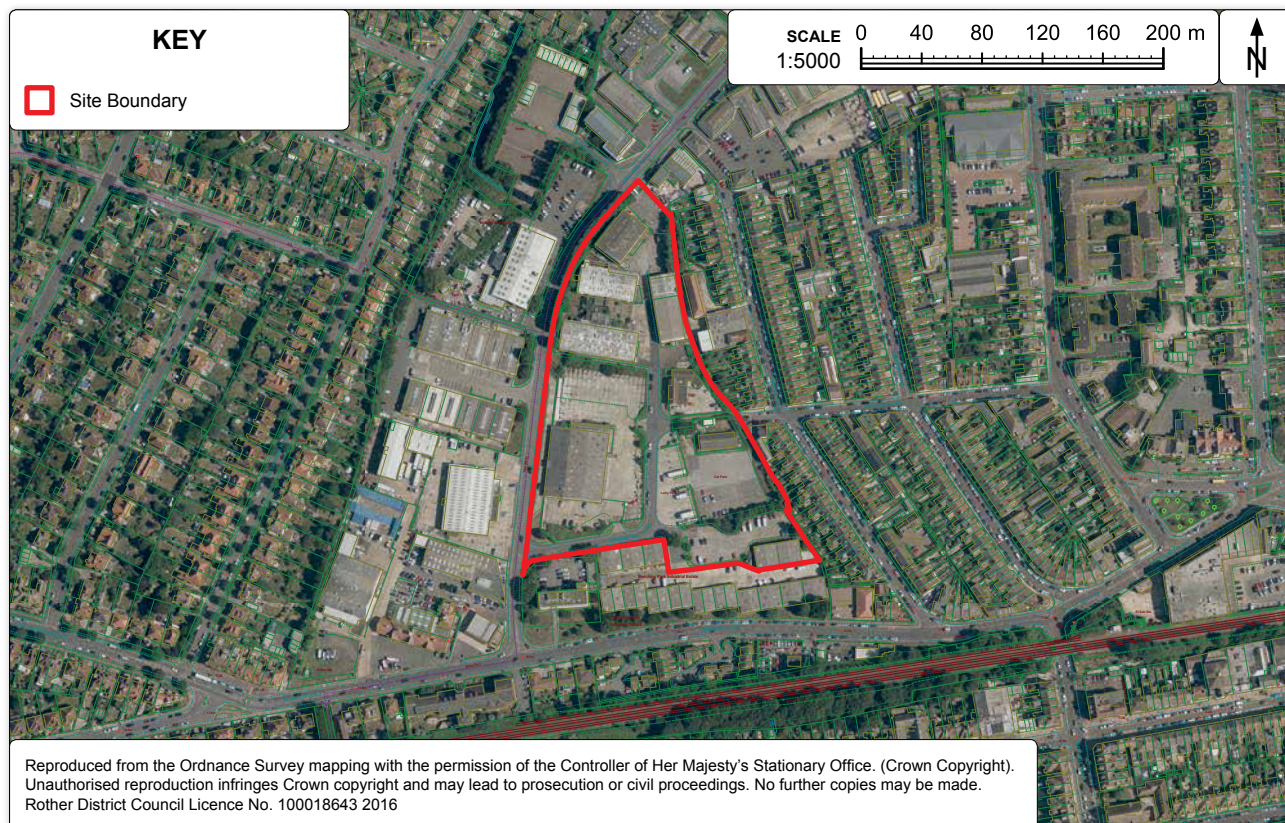
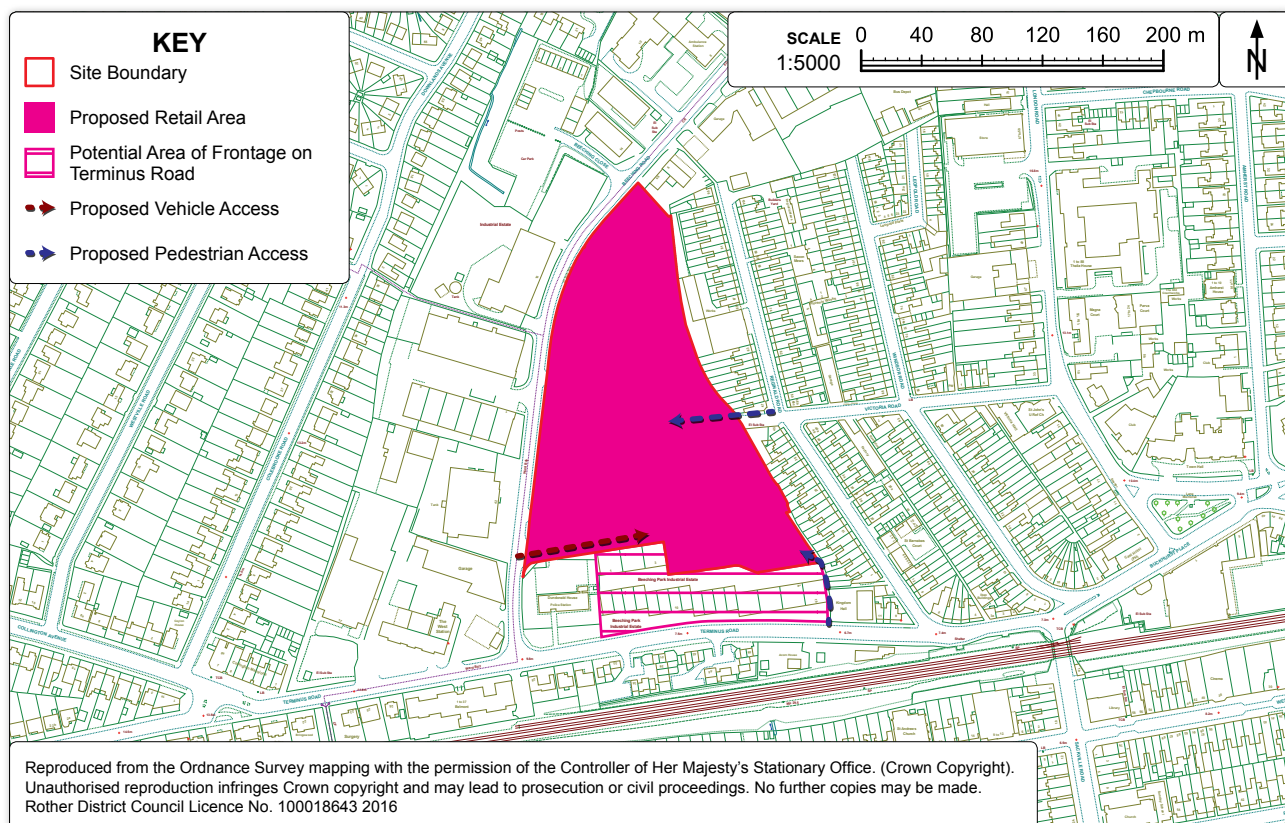


Figure 49. BX122 Detail Map



Policy BEX15: Land south-east of Beeching Road

Land south-east of Beeching Road, as shown on the Policies Map, is allocated for convenience retail development. Proposal will be permitted where the scheme:

- (i) provides 2,000sqm of convenience floorspace;
- (ii) provides only food and ancillary retail sales, and excludes a pharmacy and any other form of service outlet which might undermine the vitality and viability of the town centre;
- (iii) is accompanied with a Retail Impact Assessment in line with the requirements of Policy EC7;
- (iv) includes provision for the development of office units, if practicable;
- (v) provides an appropriate proportion of Terminus Road frontage to create a visual connection with the Town Centre;
- (vi) brings forward an attractive and safe pedestrian link from the retail store car park/store entrance to Terminus Road along the eastern boundary and the environmental improvement of pedestrian links across Terminus Road;
- (vii) provides a commuted sum for the improvement of public transport to serve the development;
- (viii) provides consequential offsite highway works to improve the junction of Beeching Road and London Road;
- (ix) locates the car park on the southern part of the site and agreement is made for the store's car park to be made available for use by any member of the public;
- (x) the existing coach and lorry park is reprovided for at a suitable location; and
- (xi) demonstrates that the access arrangements and the service yard are located in a position that protects the residential amenity of adjacent properties.

QUESTION 43: Do you agree with the requirements of Policy BEX15? If not, how would you wish to see it amended?

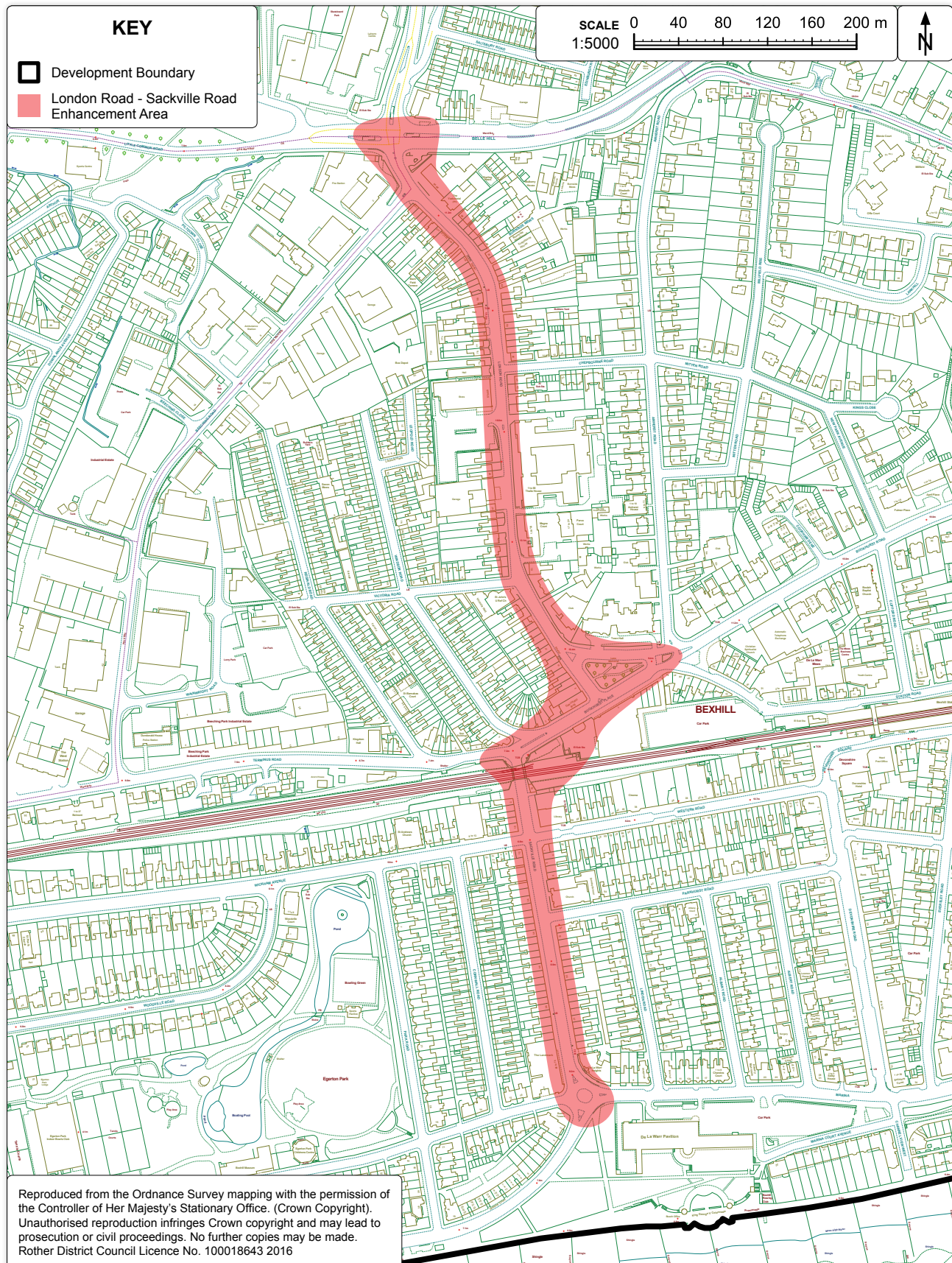
London Road - Sackville Road Enhancement Area

- 13.66. Travelling into Bexhill along the A259, the A269 or the new Combe Valley Way, the Town Centre is approached via the southern section of London Road, Buckhurst Place and Sackville Road. Sackville Road also continues to the seafront and the De La Warr Pavilion.
- 13.67. However, it does not appear as an obvious or easy “gateway” for people approaching to the Town Centre either on foot or by car and, furthermore, presents a poor initial impression.
- 13.68. Large advertising hoardings adjacent to the A259 junction do not set a high quality tone on entering London Road. Traffic flows, particularly on the northern section between Chepbourne Road and the A259, is regularly impeded by cars illegally parked on yellow-lined sections on both sides of the road, in some cases mounting the kerb, which adds to the general poor appearance of the street and limits the footway width on both sides. Traffic queues regularly form in London Road from the traffic lights at the A259, while the lack of a right-hand turn lane into Beeching Road can also cause queueing at the junction with the A259. While there are private car parks for a few businesses, there is no readily accessible public off-street parking to support the wide range of shops along London Road.
- 13.69. Shops variously serve either the local catchment or seek to take advantage of the through-route location. However, not untypical of fringe retail areas in a constrained environment, the presentation of shopfronts and advertising can be poor and lacking continuity of appearance, often also reflected in the upper parts of the buildings. Vacant units occur regularly and can become an eyesore. The condition and mix of materials on footways and several private forecourts is variable.
- 13.70. Buckhurst Place (also referred to as “Town Hall Square”) benefits from its central Green, with flower beds and Cherry trees, but any “sense of place” is not helped by the long flank brick wall of Sainsburys. In addition dominating traffic flows, on-street parking and the prominent taxi rank around the gyratory create confusion for some users and pedestrian crossing difficulties, particularly on the western side across the square.
- 13.71. Sackville Road contains Edwardian terraces worthy of the Conservation Area status. However, entering it from the north is inauspicious, the junction with Buckhurst Place and Terminus Road having an awkward road layout, slow-moving traffic and hoardings dominating the railway arch, along with narrow pedestrian footways through the arch. The condition of buildings is generally good and there is a mix of activities, including retail, food and drink (which are also present on London Road) and residential (although predominantly on the upper floors). However, there is a marginal “feel” to commercial activities, which may not be helped by the constantly occupied on-street parking.

- 13.72. The significance of these streets to the appeal of, and approach to, the Town Centre is considered to warrant positive plans for their enhancement, based on a clear understanding of the role and priorities for each of the areas discussed above.
- 13.73. Priorities may relate to traffic, parking, pedestrian safety and public realm improvements and supporting commercial activities, including promoting cultural uses close to the De La Warr Pavilion (see Cultural Area proposal in Policy BEX14), as well as improving or increasing the housing stock; recognising that the upper parts of buildings over the shops are or could be converted into flats which provide a demand for local services.
- 13.74. The area being considered for identification as an “enhancement area” is shown on Figure 50 below.

QUESTION 44: Do you agree that London Road – Sackville Road, Bexhill should be targeted for enhancements and, if so, what should be the priorities?

Figure 50. London Road - Sackville Road Enhancement Area



District shopping centres of Little Common and Sidley

- 13.75. Access to shops and services, particularly those that meet day-to-day needs, is a vital aspect of sustainable development. These centres provide a focus for communities, are a source of jobs and help reduce the need to travel, especially by car. Government policy for sustainable communities gives emphasis to sustaining and enhancing the vitality and viability of these centres. In line with the Core Strategy, the hierarchy of shopping centres is identified and, in relation to Bexhill, district centres are identified at Little Common and Sidley.
- 13.76. Little Common District Centre appears to be functioning well; there is a low vacancy rate within the centre and there is a good mix of retail and professional services such as banks and estate agents, although the former Co-op building remains vacant. There is a small supermarket within the centre. There are some pockets in the centre which experience high turnover of occupants but generally the traders have been in Little Common for a long time. There are some restaurants, cafes and takeaways, but the predominant use is retail. In considering the role and function of the centre and how it is currently performing, no amendments are proposed to the existing boundary.
- 13.77. Sidley district centre has experienced a challenging time in recent years; although the vacancy rate is not high, there has been a high turnover of occupants within the centre and there is a very high proportion of takeaways. Sidley is one of the most deprived areas within the District and for this small geographical area, it represents over-concentration of such uses which could negatively impact on the health and well-being of the local population. Local consultation highlights concern by residents of the numbers of takeaways in Sidley and the impact on its function to perform as a shopping area in the daytime and the impact of external shutters on the shop facades.
- 13.78. Given the high concentration of takeaways in Sidley district centre and the known deprivation issues in the locality it is considered that the further concentration of takeaways should be resisted. Retail uses in this area should be encouraged to promote a district centre with more vitality and vibrancy.
- 13.79. In considering the role and function of the centre and how it is currently performing, modest areas on the northern and southern fringes are not currently occupied by retail or service uses and have not been for some time. Therefore two minor changes are proposed to the District Centre to consolidate this defined boundary. Figure 52 details these proposed amendments.

Figure 51. Proposed boundary to Little Common District Centre

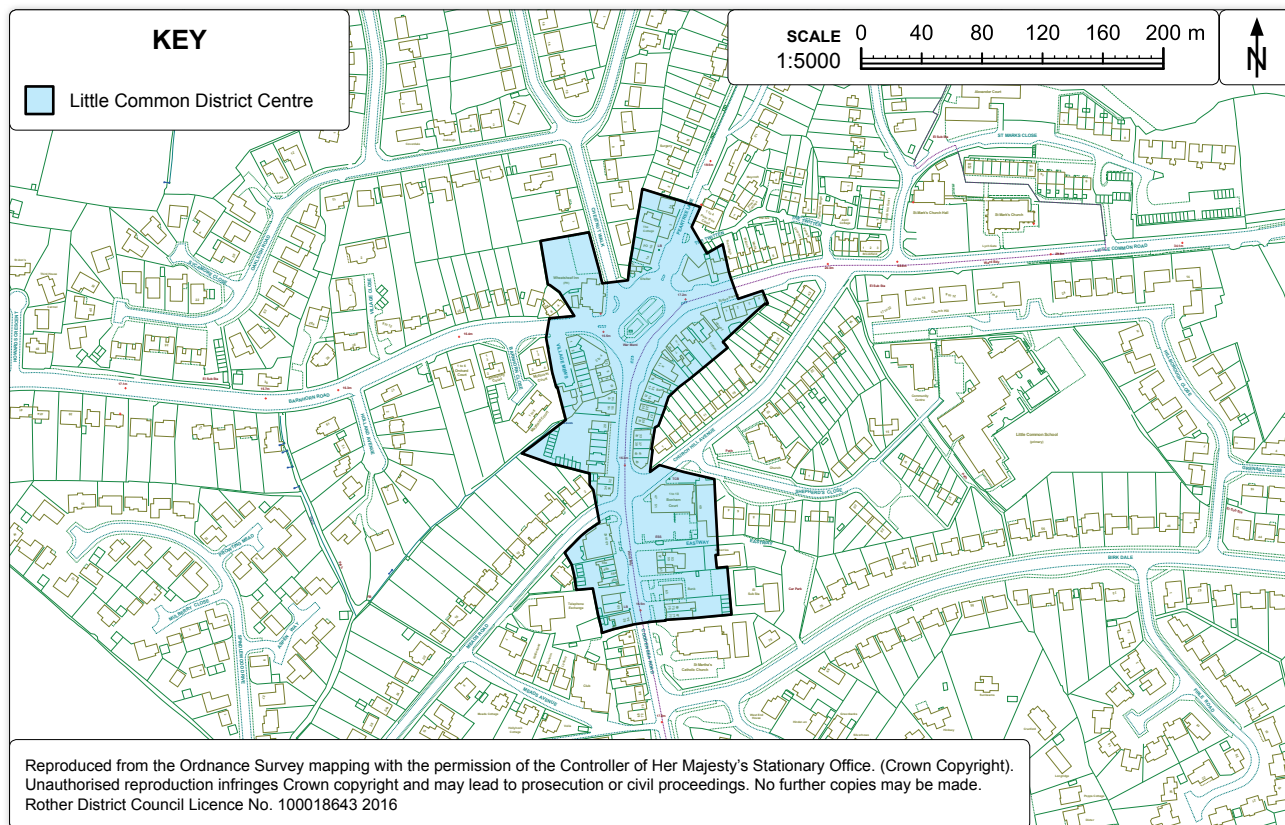
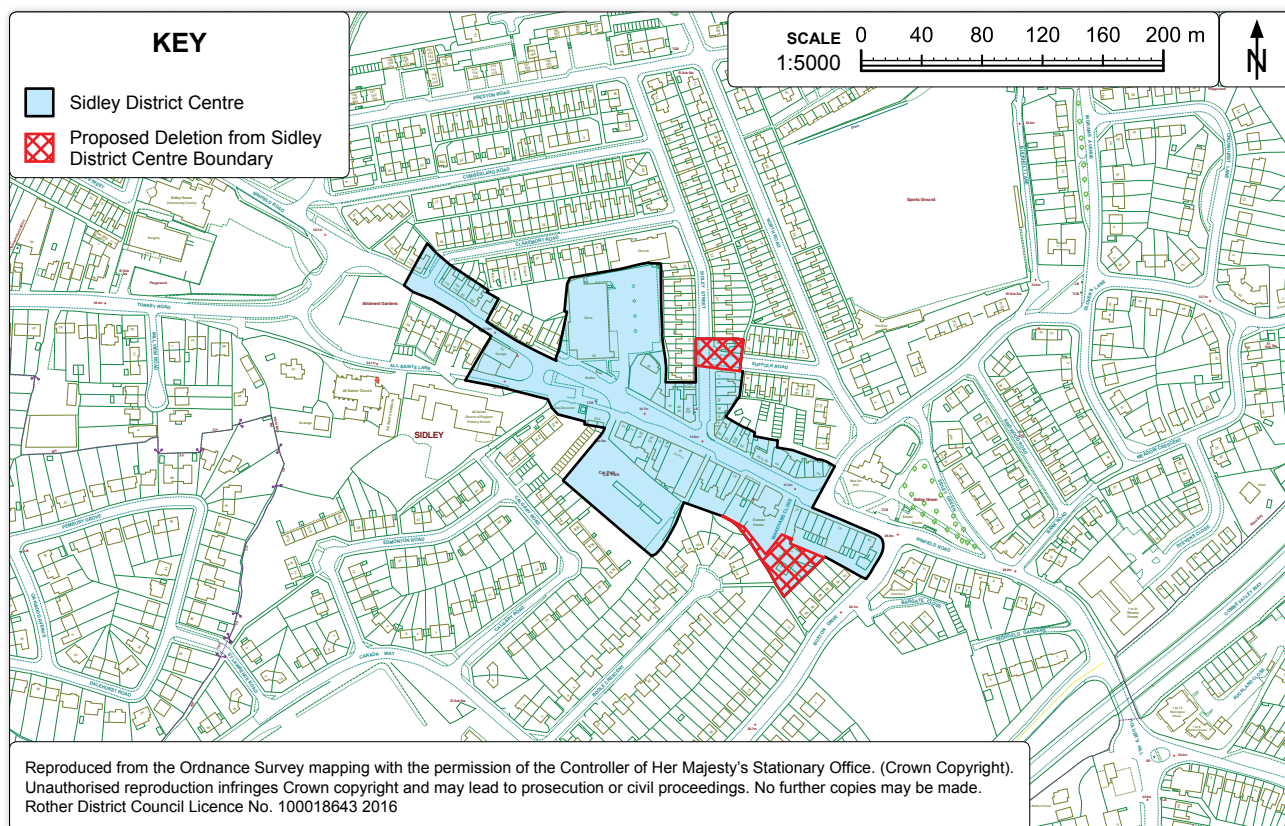


Figure 52. Proposed boundary to Sidley District Centre



Policy BEX16: Little Common and Sidley District Centres

Little Common and Sidley District Centres are defined on the Policies Map, and will be the primary focus for retail and other town centre uses.

Within these centres, as defined on the Policies Map, the loss of significant existing ground floor retail floorspace falling within Use Class A1 will be resisted. Planning permission will be granted for the introduction of new shops and the expansion or refurbishment of existing premises, subject to compatibility with other Plan policies.

Within Sidley District Centre further concentration of A5 takeaway uses will be resisted.

QUESTION 45: Do you agree with the requirements of Policy BEX16, including the proposed district shopping centre boundaries as defined in Figures 51 and 52? If not, how would you wish to see it amended?

Development boundary

- 13.80. Policy OSS2 of the Core Strategy establishes the principle of development boundaries within Rother District but does not define their boundaries. The 2006 Local Plan 'saved policy' DS3 defines the physical development boundaries on the relevant 'Inset Maps'. It is therefore the role of this document to review these development boundaries. It follows that the preferred development sites discussed earlier in this Chapter should be included within revised settlement development boundaries within Bexhill. An exception is Northeye, as this site is well beyond the built-up area of Bexhill and would not warrant a development boundary extension to include this site. These are shown in Figures 53 - 56 below.
- 13.81. Consideration is given to the scope for any small-scale development boundary amendments along the edges of Bexhill, where there may be development opportunities. As part of this review, amendments are considered as to whether sites have well-defined natural boundaries or topographical features, thereby creating a new defensible edge to the area. The function of the land and its relationship to the settlement are also important factors.
- 13.82. In reviewing the potential for small-scale development boundary amendments along the edges of Bexhill, generally it is considered that there is little scope to provide infill and rounding off opportunities that are physically, functionally and visually well related to the existing urban area, taking account of any environmental development constraints. Some minor changes are made to the development boundary in the west, in addition to those amendments made to accommodate the preferred development sites, where there is some development potential and its inclusion does not harm the structure, form and character of the adjacent countryside. Equally, consideration has also been given to whether there are any areas that warrant removal from the development boundary. No proposed changes are put forward with regard to removal from the Bexhill development boundary.

QUESTION 46: Do you agree with the recommendation regarding the Bexhill development boundary? If not, please explain how you wish the development boundary to be applied to this area?

Figure 53. Bexhill Development Boundary Map

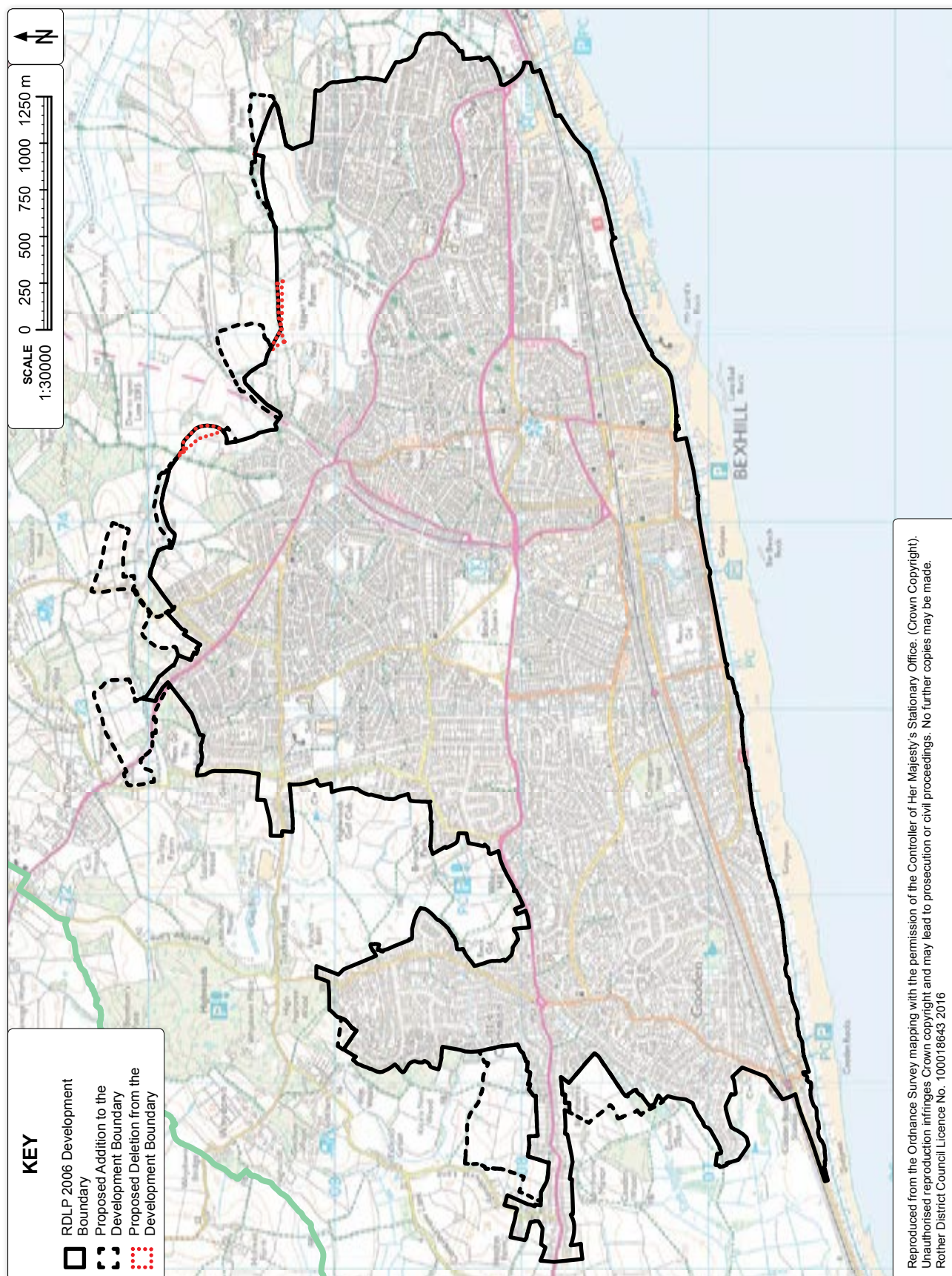


Figure 54. Bexhill East Development Boundary Map

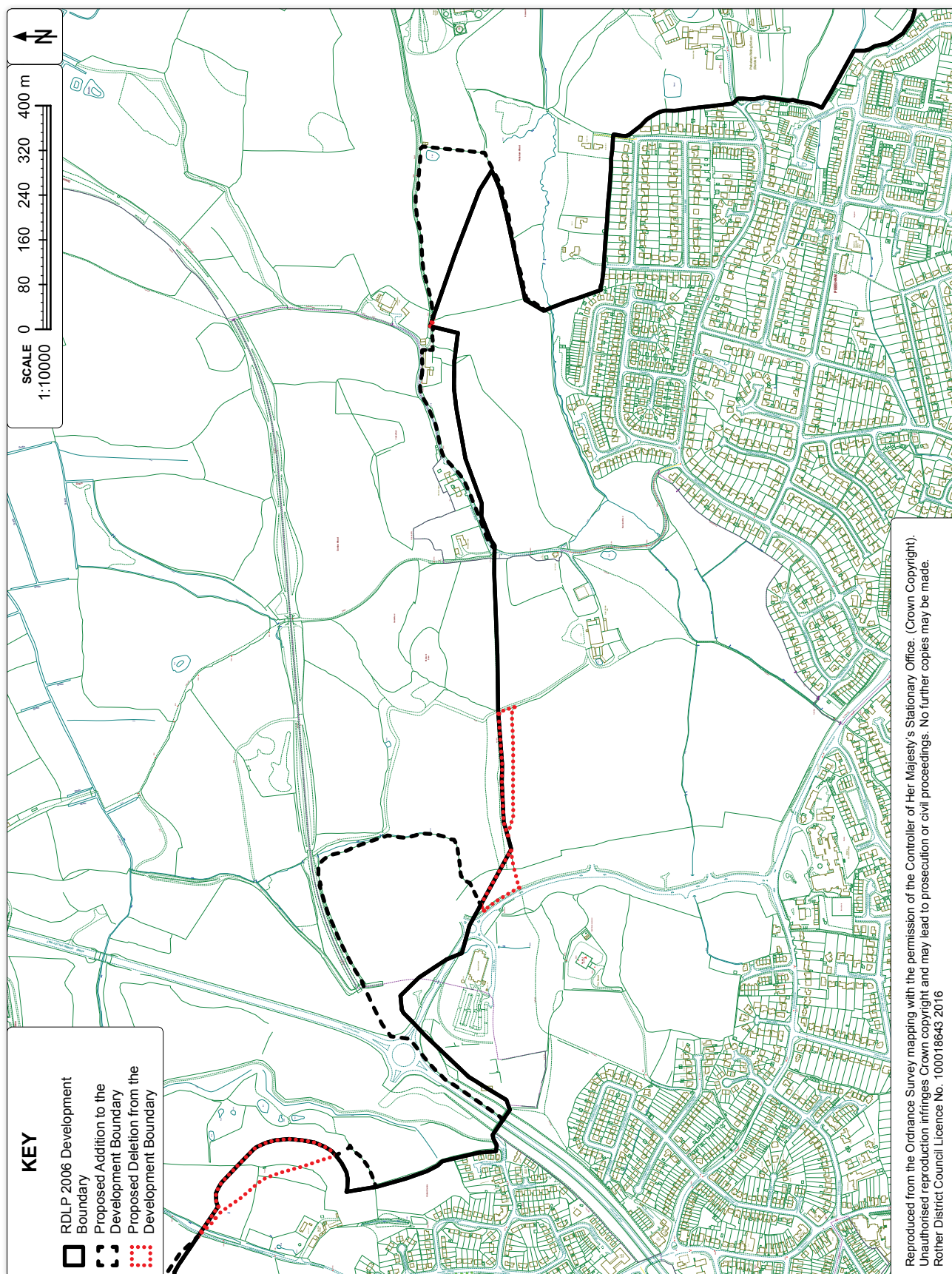


Figure 55. Bexhill North Development Boundary Map

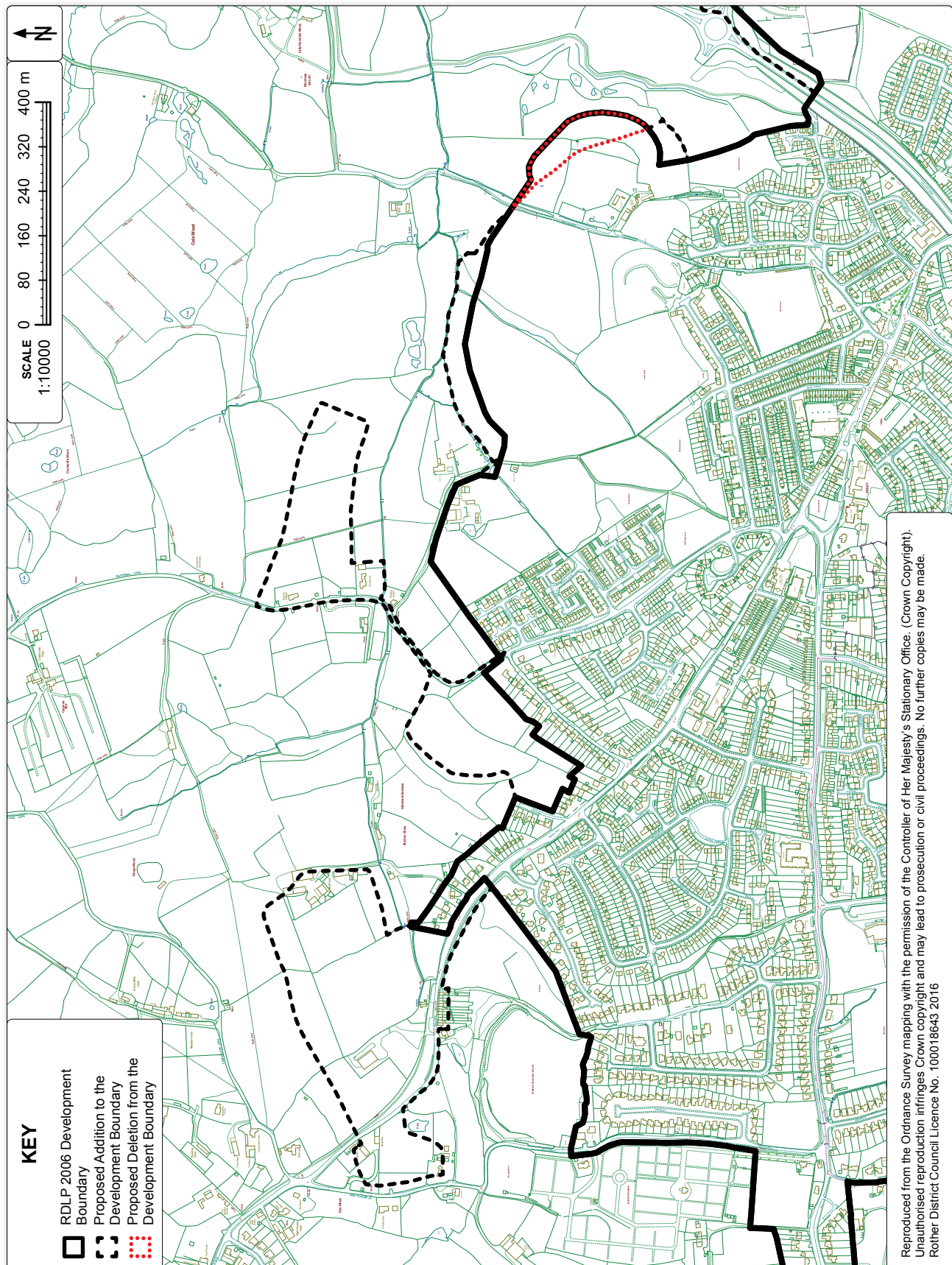
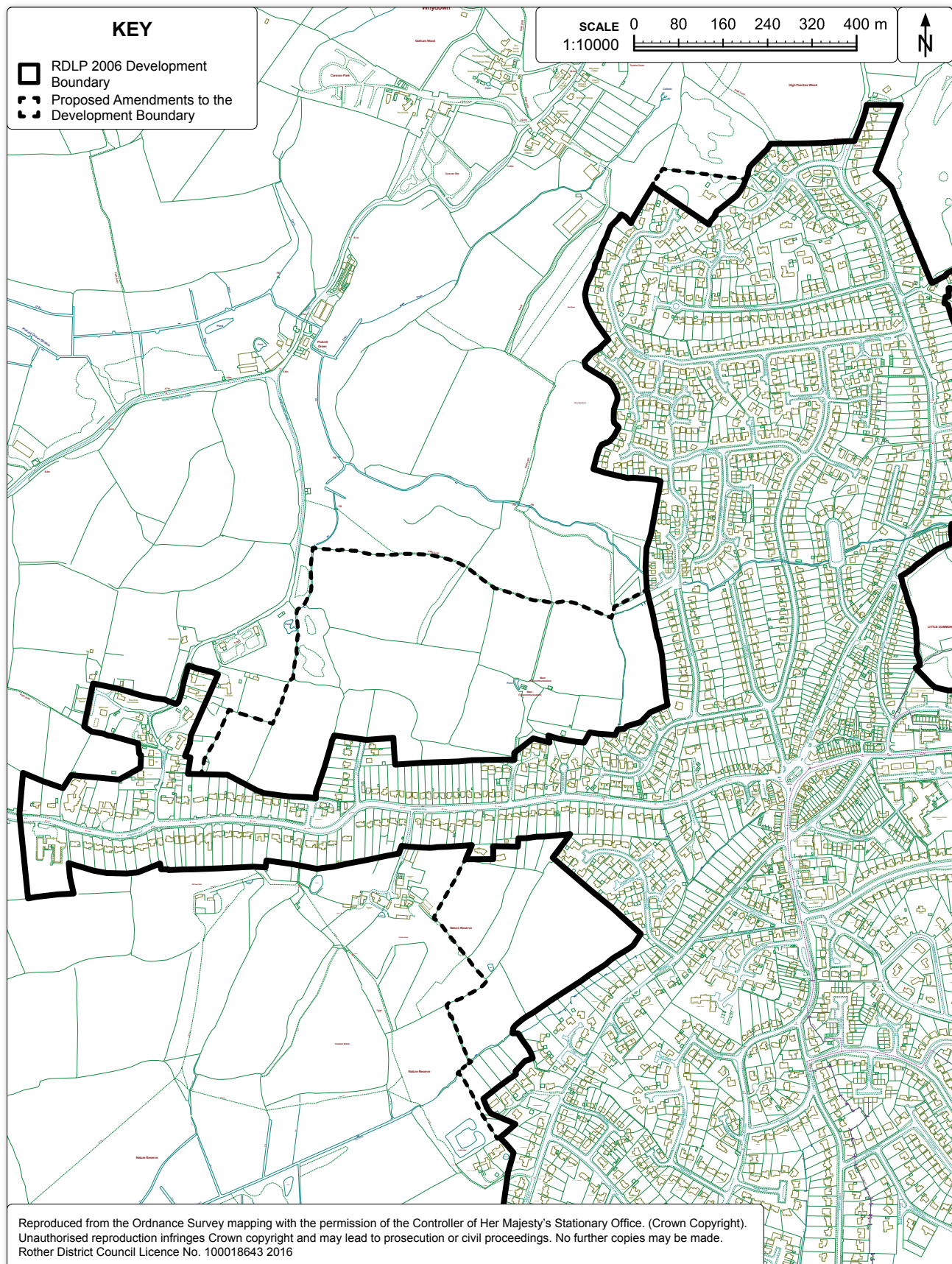


Figure 56. Bexhill West Development Boundary Map



14. Hastings Fringes

Context

- 14.1. The built-up area of Hastings extends in most parts up to the administrative boundary, with a number of its peripheral areas extending over into Rother district. The Hastings Fringes is defined within the Core Strategy as those areas that are within Rother district and contiguous with the built up area of Hastings, encompassing areas along Westfield Lane, Beaney's Lane, Woodlands Way, Parkwood Road, Sandhurst Gardens, Stonestile Lane, Chowns Hill, Ivyhouse Lane, Rock Lane and Batchelors Bump.
- 14.2. There are existing development boundaries containing development along Westfield Lane, Woodlands Way, Parkwood Road, Ivyhouse Lane and Rock Lane. Generally, although Rother residents who live within these areas are physically close to Hastings, many of these areas relate far more to their rural surroundings than to the town and are important to its setting.
- 14.3. A large proportion of the Hastings Fringes are heavily constrained, principally by the High Weald Area of Outstanding Natural Beauty (AONB) designation.

Development Provisions

- 14.4. The Core Strategy identifies 100-250 dwellings up to 2028 as well as at least 3,000sqm of business floorspace within the Hastings Fringes. As at 1st April 2016, 8 dwellings have been constructed and 78 dwellings have planning permission. This leaves a remaining minimum requirement of 14 dwellings to 2028. In terms of employment floorspace, as at 1st April 2016, there are no sites with planning permission or completions along the Fringe since the Core Strategy base date of 2011.

Site options for housing

- 14.5. There are eleven sites considered as potential housing sites along the Fringe and can be identified within Figure 57 below. The sites are spread along the Fringe, but mainly concentrated along the northern boundary of Hastings, the majority are greenfield sites adjacent to existing development boundaries. The sites considered are:

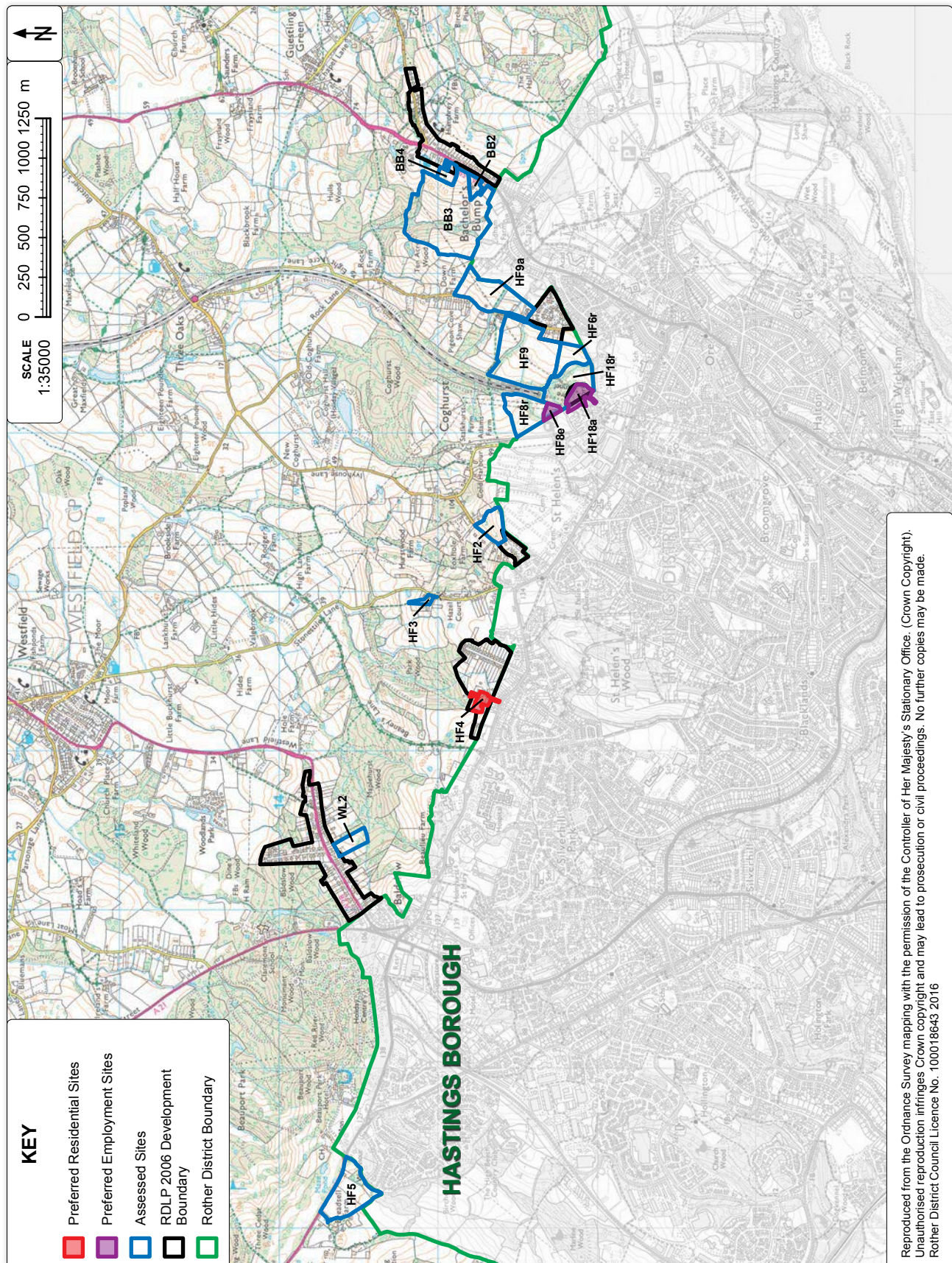
BB2: Land adjoining Milward Gardens, Batchelors Bump
BB3: Land west of Winchelsea Road (Lidham Farm), Batchelors Bump
BB4: Land at Thorsfield and Chatswood House
HF2: Land adjacent to Capricorn, Chowns Hill
HF3: Land on Stonestile Lane
HF4: Land at Michael Tyler Furniture, Woodlands Way
HF5: Land at Breadsell Lane¹
HF6r: Land adjacent to Rock Lane
HF9: Land west of Rock Lane
HF9a: Land north of Austen Way
WL2: Land rear of 66-78 Westfield Lane

- 14.6. The preferred development site for housing is Land at Michael Tyler Furniture, Woodlands Way (Ref: HF4).
- 14.7. The preferred housing site is a brownfield site located within the existing development boundary along the Fringe area to the north of 'The Ridge' at Michael Tyler Furniture, Woodlands Way (Ref:HF4). The site is an existing employment site that has become increasingly underused over the years and the older style format of the buildings has deterred other employment occupiers from utilising the site for alternative business uses. The owners have marketed the site for a number of years to let out the vacant space but have received little interest. It is considered that this brownfield site is preferable over other greenfield options along the Fringe. This site yields some 35 dwellings which, together with what has already been permitted, exceeds the minimum target of 100 dwellings along the Hastings Fringes.
- 14.8. Further details of individual sites can be found in Appendix 3.

QUESTION 47: Do you agree with the preferred site for housing development along the Hastings Fringes? If not, which site(s) should be preferred?

¹ The site off Breadsell Lane was considered previously as part of large sustainable mixed use urban extension jointly with Hastings Borough Council. However, the site was considered by the Hastings Inspector as part of their Core Strategy Examination and robustly concluded that the site should be omitted from their Plan on both sustainability and environmental grounds.

Figure 57. Hastings Fringes Options Map



Preferred Site: Land at Michael Tyler Furniture, Woodlands Way (Ref: HF4)

Existing use(s)	Employment floorspace, partly vacant.
Size	0.97ha
Key constraints/opportunities	<p>The site is located on the northern side of The Ridge, Hastings within the development boundary along the Hastings Fringes. The site is adjacent to the High Weald Area of Outstanding Natural Beauty (AONB). This brownfield site comprises of three existing industrial buildings which are only partly in use and have been for some years. These buildings are poor grade, low value units which are not of modern construction. Policy EC3 in the Core Strategy allows for the change of use of employment sites where there is no prospect of their continued use.</p> <p>The low density residential properties to the south, west and north of the site with further residential development currently under construction to the east. Residential dwellings to the north are few and set within large plots, thereby representing low density development and maintaining a rural context to the High Weald AONB.</p> <p>Any development would need to be mindful of the AONB countryside to the north and appropriate landscape buffers would need to be incorporated within any potential scheme to respect wider views from the north. Care should also be taken to respect the relationship with residential properties on the periphery of the site.</p> <p>The general topography falls to the north-west at a few degrees. To provide level areas for the existing buildings/parking there has been some cut-and-fill. There is a bank down to the adjacent bungalows to the north, and a bank and retaining wall down from the adjacent site to the east, around 2.0m high.</p> <p>Parts of the site are located within areas of surface water drainage issues. The site may contain Japanese Knotweed.</p> <p>This area off Woodlands Way has been subject to incremental residential developments which individually have not provided children's play space. Additional residential development would assist in providing play space for a large residential area where there is a lack of provision.</p>
Proposed use(s)	Housing and children's play space.
Developable area	0.97ha
Capacity	Some 35 dwellings.

Figure 58. HF4 Aerial Map

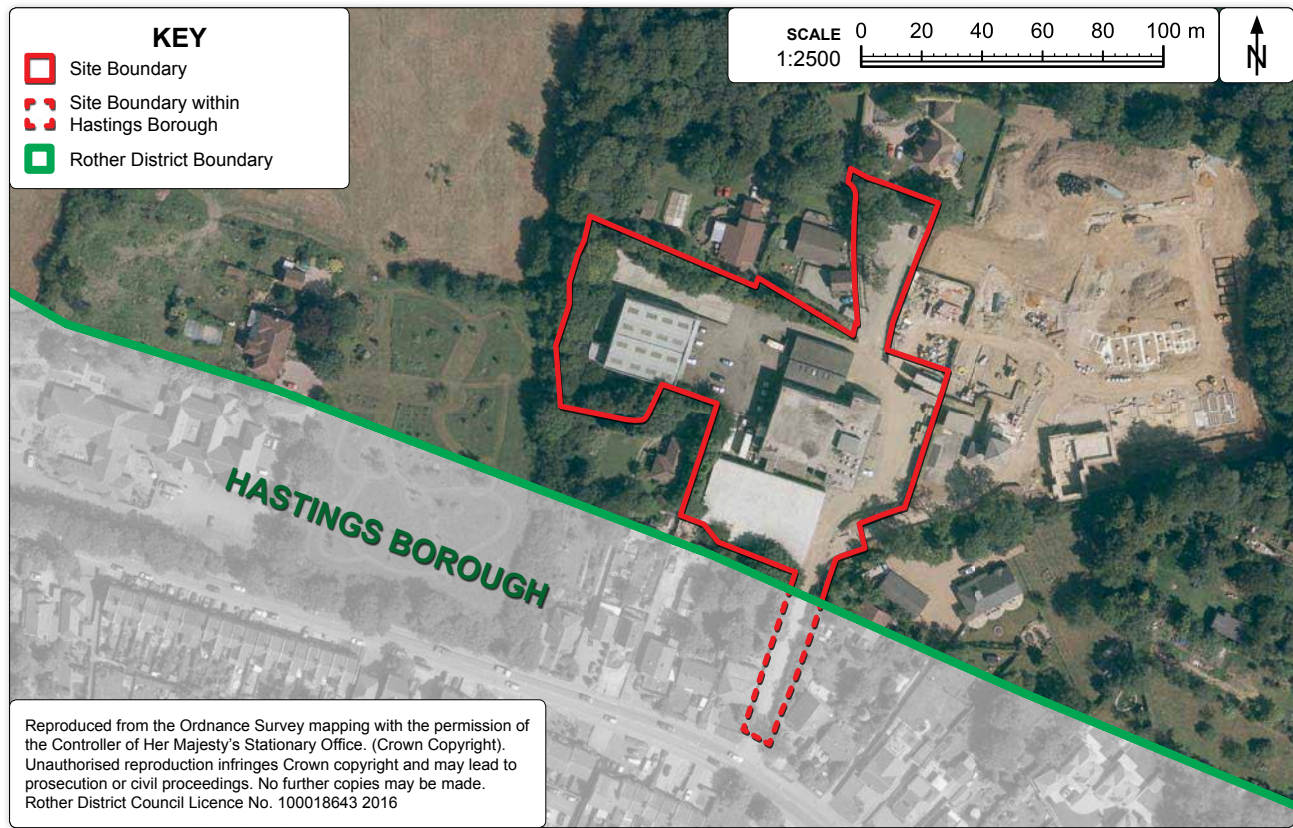


Figure 59. HF4 Detail Map



Policy HAS1: Land at Michael Tyler Furniture, Woodlands Way, Hastings

Land at Michael Tyler Furniture, Woodlands Way, Hastings, as shown on the Policies Map, is allocated for housing purposes. Proposals will be permitted where:

- (i) some 35 dwellings are provided, of which 30% are affordable;
- (ii) suitable provision is made for children's play space in the form of a Locally Equipped Area for Play (LEAP);
- (iii) development does not intrude into views from the Area of Outstanding Natural Beauty to the north; and
- (iv) the tree belt on the west and north of the site is strengthened.

QUESTION 48: Do you agree with the requirements of Policy HAS1? If not, how would you wish to see it amended?

Site options for employment

- 14.9. There are four sites considered as potential employment sites along the Fringe and can also be identified within Figure 57. The sites are spread along the Fringe, but are predominantly concentrated on the northern boundary of Hastings. Three sites abut the existing development boundary adjacent to the existing Ivyhouse Lane Industrial Estate, with a further site considered on the extreme western edge of the Fringe, off Breadsell Lane. The sites considered are:

HF5: Land at Breadsell Lane
HF8e: Land north of A265, Ivyhouse Lane
HF8r: Land north of A265, Ivyhouse Lane
HF18a: Land east of Burgess Road

- 14.10. The preferred development sites for employment are:

HF18a: Land east of Burgess Road
HF8e: Land north of A265, Ivyhouse Lane

- 14.11. Individual site conclusions can be found in the Employment Sites Review.

- 14.12. The two preferred employment sites are located on land adjacent to the existing Ivyhouse Lane industrial estate located within Hastings borough where there is already a substantial quantum of well-used employment floorspace in this area. The sites are relatively sustainable in the sense that they are located adjacent to existing transport links and relatively close to services within Ore (Hastings). These sites comprise of an existing wood/scrubland on the edge of Ivyhouse Lane Industrial Estate, which has suffered from misuse and a lack of management in recent years. Some enabling employment development in the form of small scale extensions to the existing industrial estate could be developed to enable the 'raw edge' of the industrial estate to be softened and create a more acceptable transition between the estate and the High Weald AONB beyond, whilst also providing managed public access across the valley. These two sites together yield some 4,800sqm of employment floorspace, relative to a minimum target of at least 3,000sqm for the Hastings Fringes.
- 14.13. In terms of the alternative options, the site off Breadsell Lane was considered previously as part of large sustainable mixed use urban extension jointly with Hastings Borough Council. However, the site was considered by the Hastings Inspector as part of their Core Strategy Examination and robustly concluded that the site should be omitted from their Plan on both sustainability and environmental grounds. In terms of 'land north of A265, Ivyhouse Lane' (ref:HF8r), this site is not considered a favoured option due to the landscape impact on the valley between Ivyhouse Lane and Rock Lane. Development of this site would result in an unacceptable intrusion into the valley which would have a detrimental impact on the landscape on this part of the High Weald AONB.

QUESTION 49: Do you agree with the preferred sites for employment development along the Hastings Fringes? If not, which site(s) should be preferred?

Preferred Site: Land east of Burgess Road (Ref: HF18a)

Existing use(s)	Woodland/scrub land adjacent to existing industrial estate.
Size	3.1ha (in Rother District only)
Key constraints/opportunities	The existing industrial estate presents a very "raw" edge on its eastern side. The area is situated in the High Weald Area of Outstanding Natural Beauty. The adjoining land, whilst established woodland, is degraded in several ways. It is mostly rough scrub grass ground traversed by tracks and holes made for trial motorcycles and bicycles. Historically, there are also several burnt-out cars. Areas have also been cleared for overhead transmission lines and three pylons rise from within this area. Some trees, mostly oak and birch, remain. The woodland quickly thickens beyond the pylons and remains largely intact.

<p>Key constraints/ opportunities</p>	<p>The district/borough boundary runs through this land. Hastings Borough Council has supported the inclusion of adjacent land in its administrative area, amounting to 0.4ha, for employment use within its Development Management Plan (Policy HOV12).</p> <p>The site is an existing, unimplemented, Local Plan Allocation (Policy HF1 – Rother Local Plan 2006).</p> <p>This area abuts the Rock Lane Urban Fringe Management Area identified in Policy HAS4.</p> <p>In view of these conditions and the very limited ecological value of this fringe area, it is proposed that a limited expansion of the existing industrial development, by the inclusion of approximately 1.1ha of land abutting the District boundary, would enable improvements to the visual appearance of the area, including the management of adjacent woodland.</p> <p>Employment development here, along with development of adjacent land across the valley (Policy HAS4 below and residential development off Rock Lane with extant planning permission - RR/2015/1514/P) could also create managed access to this area of countryside and the wider area beyond, which is presently used in a haphazard way.</p> <p>Outline planning permission has been delegated to approve, subject to a legal agreement across both the land in Rother (RR/2016/85/P) and Hastings (HS/OA/16/00023) for 4,601sqm of business floorspace. The proposal also includes the overall approach for the management of the adjacent woodland.</p> <p>The accompanying legal agreement will secure provision of a footpath to become a Public Right of Way, to safeguard a route for a potential further footpath and a financial contribution towards works to construct bridges necessary to join the new footpath to adjoining land. This site is put forward for allocation as this is beyond the base date of this consultation draft Development and Site Allocations Plan (1st April 2016).</p> <p>At this stage, it is assumed that the area in Rother District will accommodate some 3,000sqm of business floorspace.</p>
<p>Proposed use(s)</p>	<p>Employment, managed woodland and new public rights of way.</p>
<p>Developable area</p>	<p>1.1ha (in Rother District only)</p>
<p>Capacity</p>	<p>3,000sqm (B1/B2/B8) floorspace.</p>

Figure 60. HF18a Aerial Map

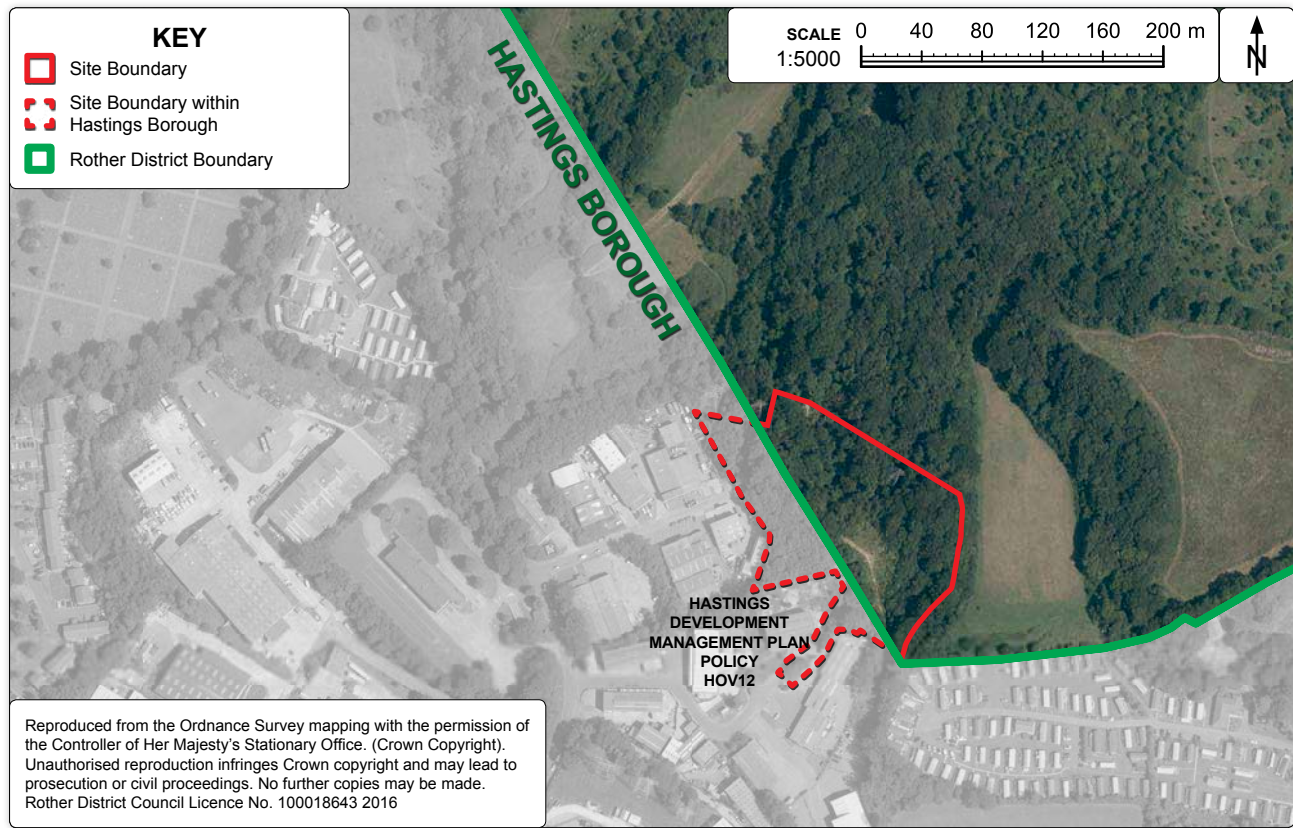
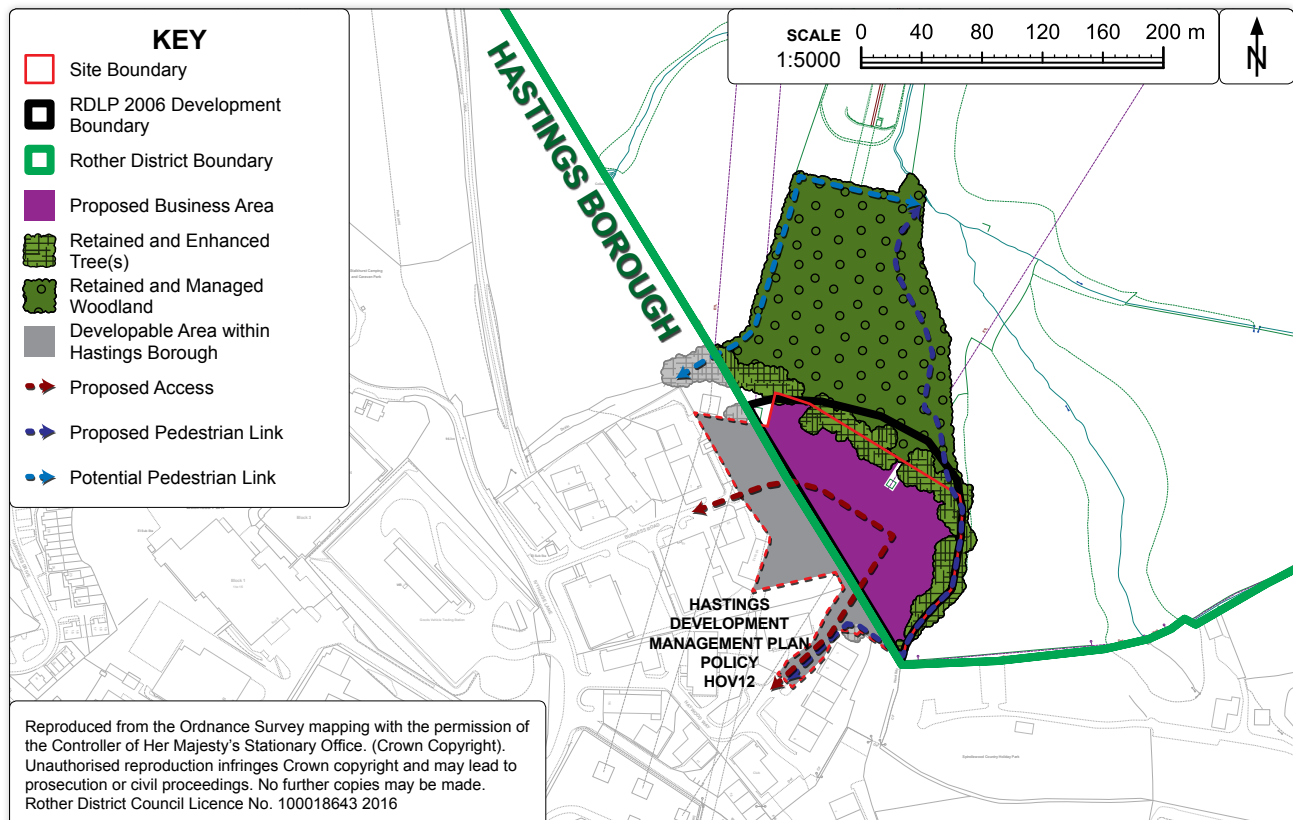


Figure 61. HF18a Detail Map



Policy HAS2: Land east of Burgess Road, Hastings

Land east of Burgess Road, Hastings, as defined on the Policies Map, is allocated for employment purposes. Proposals will be permitted where:

- (i) access is provided off Burgess Road in the form of a loop to Haywood Way;
- (ii) some 3,000sqm of business floorspace is provided;
- (iii) a comprehensive scheme is developed in conjunction with the adjoining employment allocation in Hastings Borough;
- (iv) provision is made for the retention and future management of woodland to the north of the site;
- (v) provision is made for public footpaths within the site to join adjacent land to the west (Policy HAS3) and land to the east (Policy HOV12 in the Hastings Development Management Plan) with Haywood Way; and
- (vi) it does not detract from the principles set out in Policy HAS4 relating to the adjacent Rock Lane Urban Fringe Management Area.

QUESTION 50: Do you agree with the requirements of Policy HAS2? If not, how would you wish to see it amended?

Preferred Site: Land north of A265, Ivyhouse Lane, Hastings (Ref: HF8e)

Existing use(s)	Open grassland and scrub adjacent to existing industrial estate.
Size	0.65ha
Key constraints/opportunities	<p>North-east sloping and undulating area of vacant land. The area is used for informal recreation and some anti-social activities. The general area contains a significant area of impenetrable ghyll woodland.</p> <p>The southern part of the area is affected by the adjacent industrial units and urban fringe problems such as illegal dumping. The existing industrial estate presents a very “raw” edge to the openness of the adjacent High Weald AONB. There are long views from Rye Road and Hastings Academy/ North Seat on the ridge to the east over the wider valley area. However, this area is obscured by topography and woodland cover.</p>

Key constraints/opportunities	<p>This area abuts the Rock Lane Urban Fringe Management Area identified in Policy HAS4 and the district/borough boundary with Hastings forms the western boundary of this land but does not exist as a physical boundary.</p> <p>Hastings Borough Council have allocated a site adjacent to this area for employment use (Policy HOV11 in Hastings Development Management Plan), with roughly the top third of the allocation being boundary planting. Inclusion of a wider area for further modest employment use should provide additional scope to secure improvements to the visual appearance of the area, including the improved landscape management of the valley to create a softer edge to the existing industrial estate.</p> <p>Employment development here, along with development of adjacent land across the valley (Policy HAS2: Land east of Burgess Road and the recent planning approval on Rock Lane - RR/2015/1514/P) could also create managed access to this area of countryside and the wider area beyond, which is presently used in a haphazard way. Although a financial contribution towards bridge works across the valley will need to be sought to apportion the cost of these works to developments along this fringe area.</p> <p>At this stage, it is assumed that the area in Rother District will accommodate some 1,800sqm of business floorspace. In addition to the 7,000sqm identified within the adjacent allocation within Hastings borough.</p>
Proposed use(s)	Employment (B uses) and new public rights of way.
Developable area	0.65ha
Capacity	Some 1,800sqm (B1/B2/B8) floorspace (the site is expected to be planned in conjunction with the wider area (Policy HOV11 in Hastings Development Management Plan)) within Hastings Borough.

Hastings Fringes

Figure 62. HF8e Aerial Map

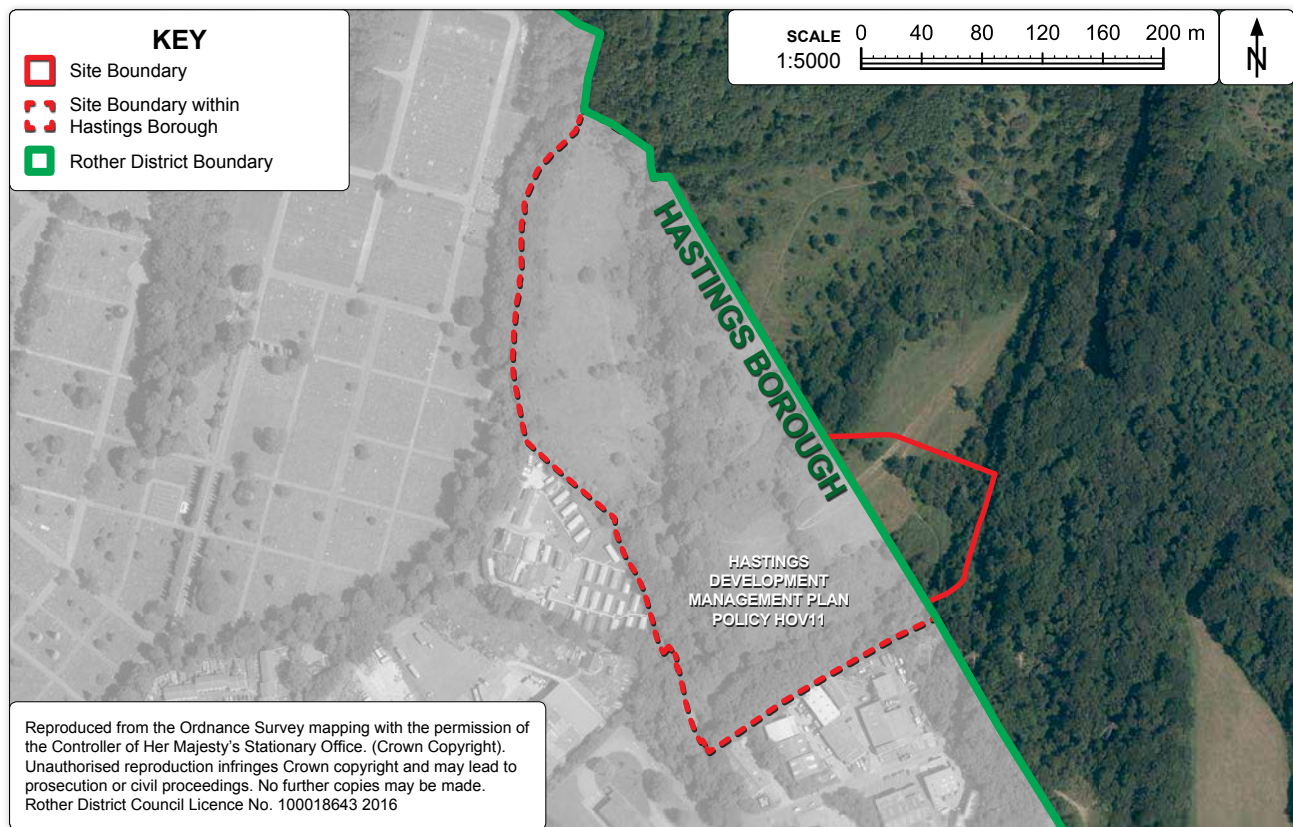
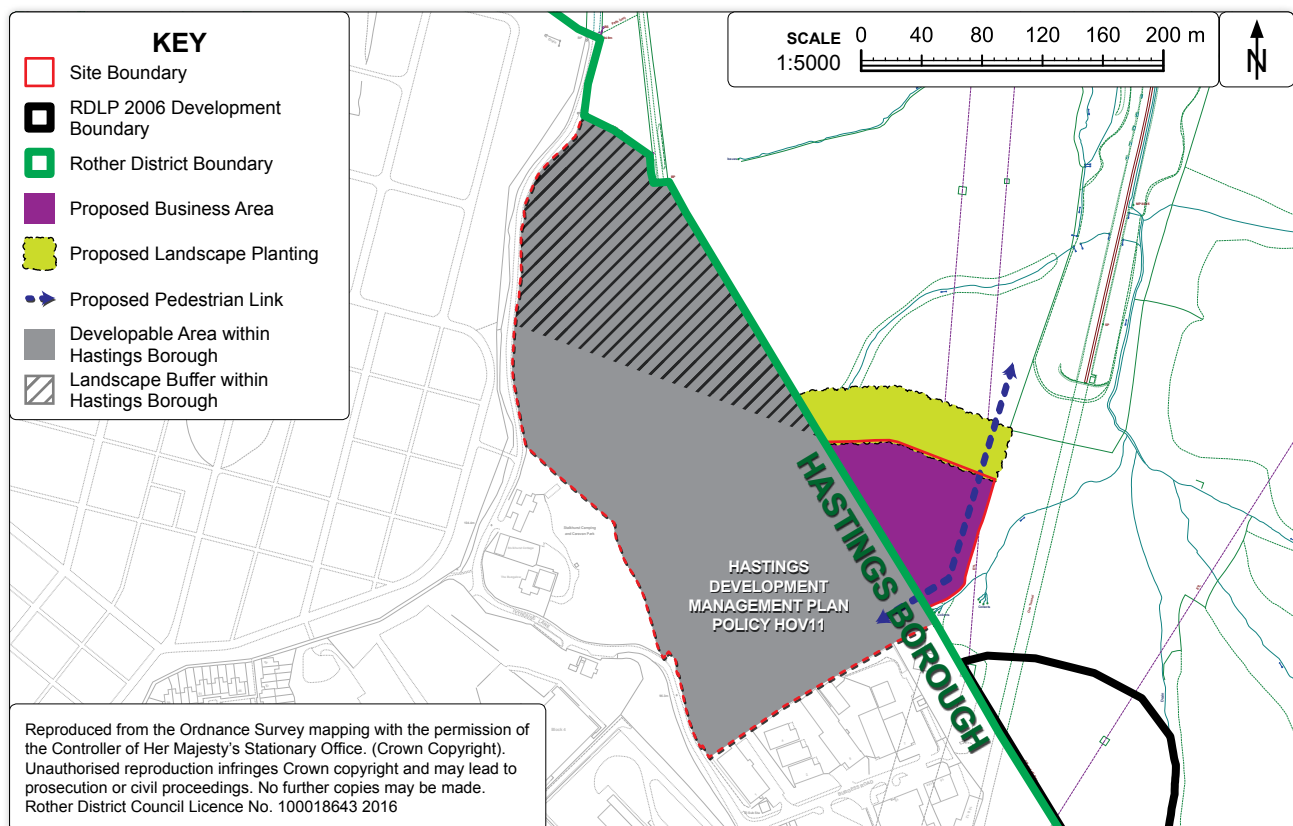


Figure 63. HF8e Detail Map



Policy HAS3: Land north of A265, Ivyhouse Lane, Hastings

Land east of A265, Ivyhouse Lane, Hastings, as defined on the Policies Map, is allocated for employment purposes. Proposals will be permitted where:

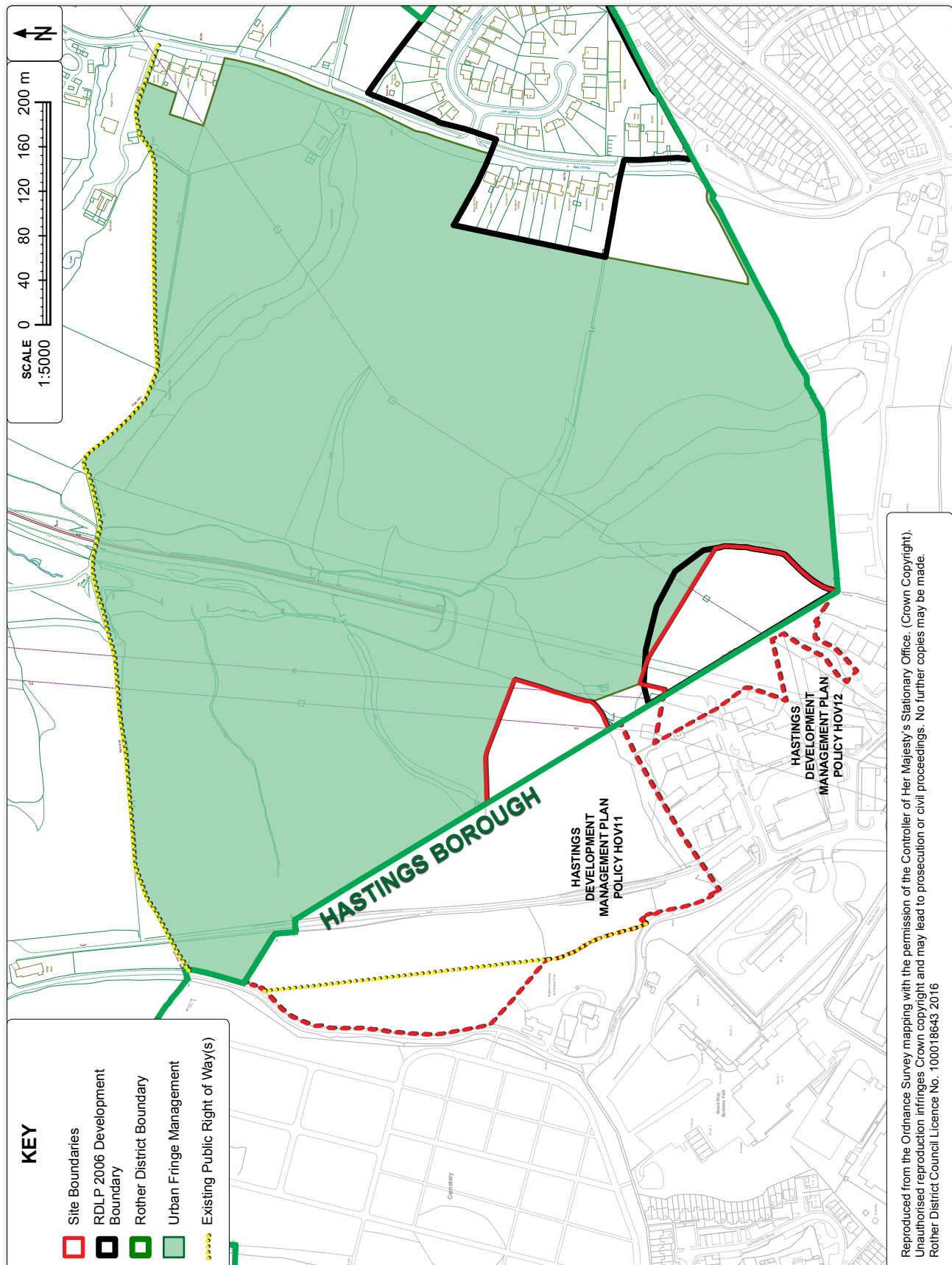
- (i) some 1,800sqm of business floorspace is provided;
- (ii) a comprehensive scheme is developed in conjunction with the adjoining employment allocation in Hastings Borough;
- (iii) access is provided off Ivyhouse Lane in Hastings Borough;
- (iv) provision is made for landscape management of this part of valley, including new and enhanced green infrastructure to the north of the employment site;
- (v) provision is made for public footpaths across the site to join adjacent land to the east (covered by Policy HAS2) with land to the west in Hastings Borough (Policy HOV12 in the Hastings Development Management Plan) and extending northwards alongside the railway line for a potential future footpath link joining the 1066 Country Walk;
- (vi) a financial contribution towards off-site bridge works across the valley is provided; and
- (vii) it does not detract from the principles set out in Policy HAS4 relating to the adjacent Rock Lane Urban Fringe Management Area.

QUESTION 51: Do you agree with the requirements of Policy HAS3? If not, how would you wish to see it amended?

Rock Lane Urban Fringe Management Area

- 14.15. The area of land north of Hastings either side of the railway as it approaches The Ridge, with Rock Lane to the east and Ivyhouse Lane to the west is identified within the Core Strategy as an area of potential for a joint urban fringe management approach. This area lies within the High Weald AONB, but its quality could be improved. Moreover, it could provide a valuable amenity for the surrounding areas, especially if access opportunities were increased.
- 14.16. There is an opportunity in this location to facilitate the creation of an area of multifunctional green space as a buffer between town and countryside. The area has no doubt fallen into poor management as it is not especially attractive for agricultural use and, due to this neglect some areas are misused for anti-social behaviour. By contrast, it is well used as accessible natural green space and this use could be formalised and greatly enhanced. To release some of the less sensitive areas for development could be the catalyst to address this urban fringe issue. This would also provide an opportunity to secure the future management of the area as a resource to serve the surrounding population.
- 14.17. Therefore, some small-scale development in this area, as identified earlier in this Chapter, and by the recently approved housing development on Rock Lane, would not only facilitate improvements to existing green infrastructure but also enable the adjacent population with access to nature and recreation through the creation of not only new formal footpaths but also introducing improved management of woodland and the wider countryside to protect existing nature and biodiversity.
- 14.18. Therefore, any development potential in this locality should be viewed in the context of a wider area-based initiative to improve the landscape quality and formal access to the countryside to establish an appropriate transition area between the built-up area of Hastings and the immediately adjacent High Weald AONB countryside.

Figure 64. Rock Lane Urban Fringe Management Area



Policy HAS4: Rock Lane Urban Fringe Management Area

Land between Ivyhouse Lane and Rock Lane, as shown on the Policies Map, is allocated as the Rock Lane Urban Fringe Management Area.

Development that would harm the openness of this Urban Fringe Management area or its significance and value to the local community will not be permitted.

Landscape management proposals which improve the landscape character, green infrastructure, biodiversity interest or formal access opportunities within this area will be supported, subject to compatibility with other policies of the Plan.

Development in the vicinity of the Urban Fringe Management Area should support the principles of its designation.

QUESTION 52: Do you agree with the requirements of Policy HAS4? If not, how would you wish to see it amended?

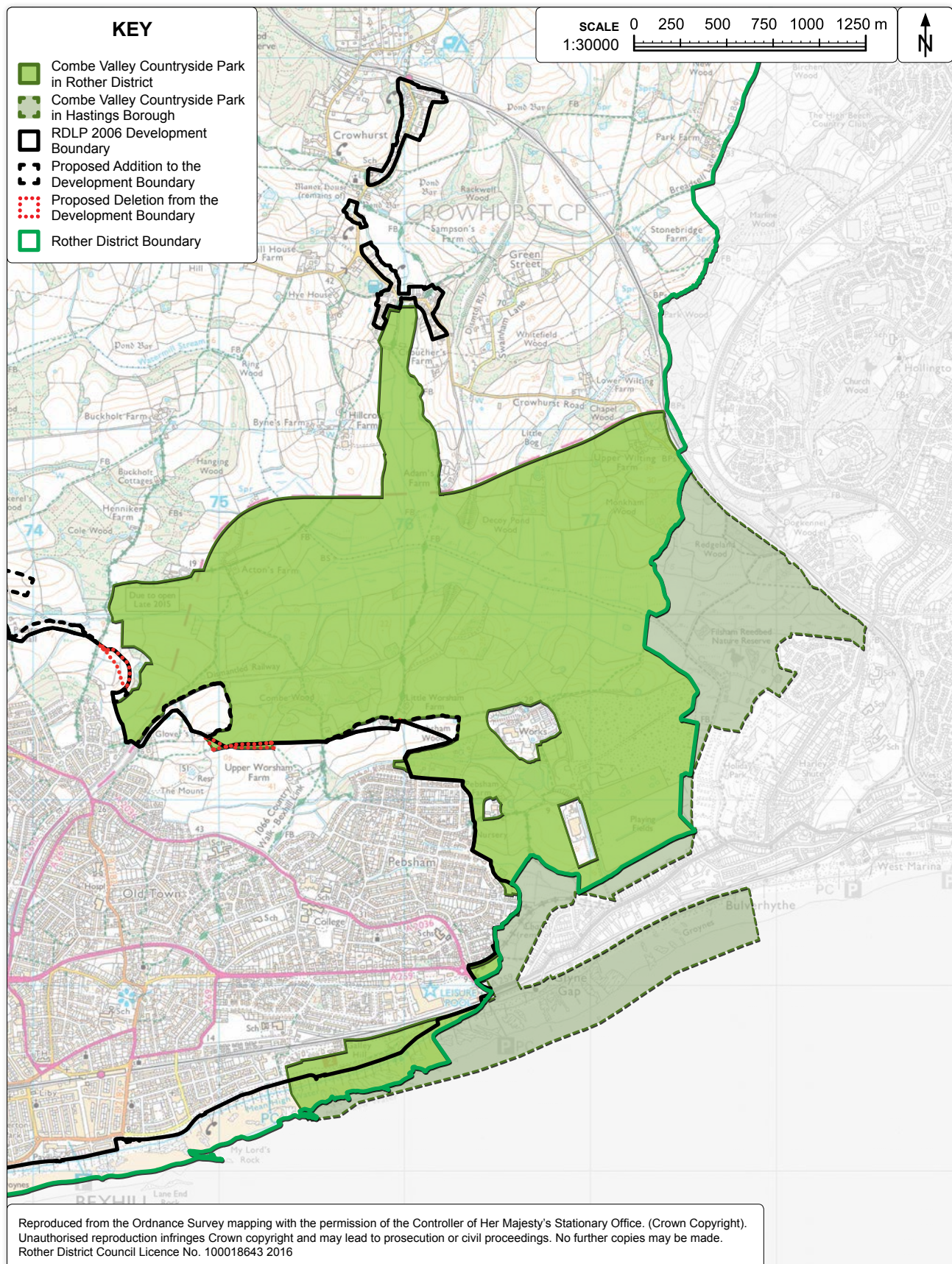
Combe Valley Countryside Park

- 14.19. The Park was originally developed jointly by Rother District Council, Hastings Borough Council and East Sussex County Council, managed by councillors from all three authorities. In 2015, it moved over to a Community Interest Company (CIC) with a board of directors including representatives of the three councils, local businesses, landowners and stakeholders including the Friends of Combe Valley Foundation which was established by local residents.
- 14.20. The Countryside Park covers an area of 600ha within Rother District and Hastings Borough. The northern area comprises the Combe Haven valley Site of Special Scientific Interest (SSSI) and reed beds. The southern part adjoining Bulverhythe contains a landfill site, a waste transfer station, a household waste site and a waste water treatment works. The Park was set up to facilitate the restoration of the landfill areas and to manage to countryside between the towns. The Countryside Park creates a significant green space between the two towns.
- 14.21. The Countryside Park is a long term project which addresses the deficiency in green space for the towns of Hastings and Bexhill. The Park serves an immediate population of 22,500 people and an overall urban population of 130,000 persons. It provides an opportunity for active recreation, walking, cycling, equestrianism, bird watching, nature studies etc. New and improved public access routes will enable the whole community to gain safe and controlled access to the Countryside Park. It is envisaged that these will help to generate new commercial opportunities for local landowners and businesses to enhance the local economy.

- 14.22. The newly established CIC oversees the strategic direction of the Park and is currently focusing on promoting the Park and encouraging and improving access. Their first project has been the construction of a Discovery Centre at Bulverhythe to provide a café and information point for the Park.
- 14.23. The principle of the Countryside Park Project established through Policy BX4 of the Rother District Local Plan (2006) and has been carried forward into Core Strategy - Policy HF1. This sets out the strategic importance of the Countryside Park, particularly in respect to the overall shared approach to future prosperity for Hastings and Bexhill and is also has a key role in maintaining the open gap between Bexhill and Hastings. The Countryside Park clearly has a very significant role in providing a substantial leisure resource for the large urban population in the Hastings/Bexhill area. As this becomes established, it is also expected to reduce the pressure on more sensitive leisure destinations in the area and will specifically help to manage the recreational pressure on more sensitive habitats, most notably the international Natura 2000 designations to the south-east and south-west of the District.
- 14.24. It should be noted that Policy HF1 did not define the boundary of the Countryside Park and therefore it is the role of the Development and Site Allocations Plan to identify the extent of the Park. Figure 65 below shows the extent of the Countryside Park.
- 14.25. The main policy elements of Local Plan (2006) Policy BX4 are proposed to be carried forward through the new Countryside Park policy. These relate to the importance of the area as a recreational and amenity resource for the residents of both Rother and Hastings, the conservation and management of the national and local nature designations within the Park including the Site of Special Scientific Interest (SSSI) and the Site of Nature Conservation Importance (SNCI). The Countryside Park also forms part of the identified Strategic Gap between Bexhill and Hastings and it is considered important to make specific cross reference to the Strategic Gap policy within the Plan. The only element not carried forward through to the new policy relates to areas at risk of flooding within the Park. The National Planning Policy Framework substantially covers policy relating to flooding and therefore it is not considered appropriate to duplicate the national policy.

Hastings Fringes

Figure 65. Combe Valley Countryside Park



Policy HAS5: Combe Valley Countryside Park

Land between Bexhill and St. Leonards, from Galley Hill in the south to Crowhurst to the north, as shown on the Policies Map, is allocated as the Combe Valley Countryside Park.

Within the Countryside Park area, proposals will only be acceptable where they:

- (i) are consistent with the establishment and maintenance of the area as a key recreational and amenity resource for Bexhill and Hastings and their wider catchment;
- (ii) provide for the proper conservation and, where appropriate, management of the Site of Special Scientific Interest and the Site of Nature Conservation Importance within it; and
- (iii) accord with the provisions set out in Policy DEN3 regarding Strategic Gaps.

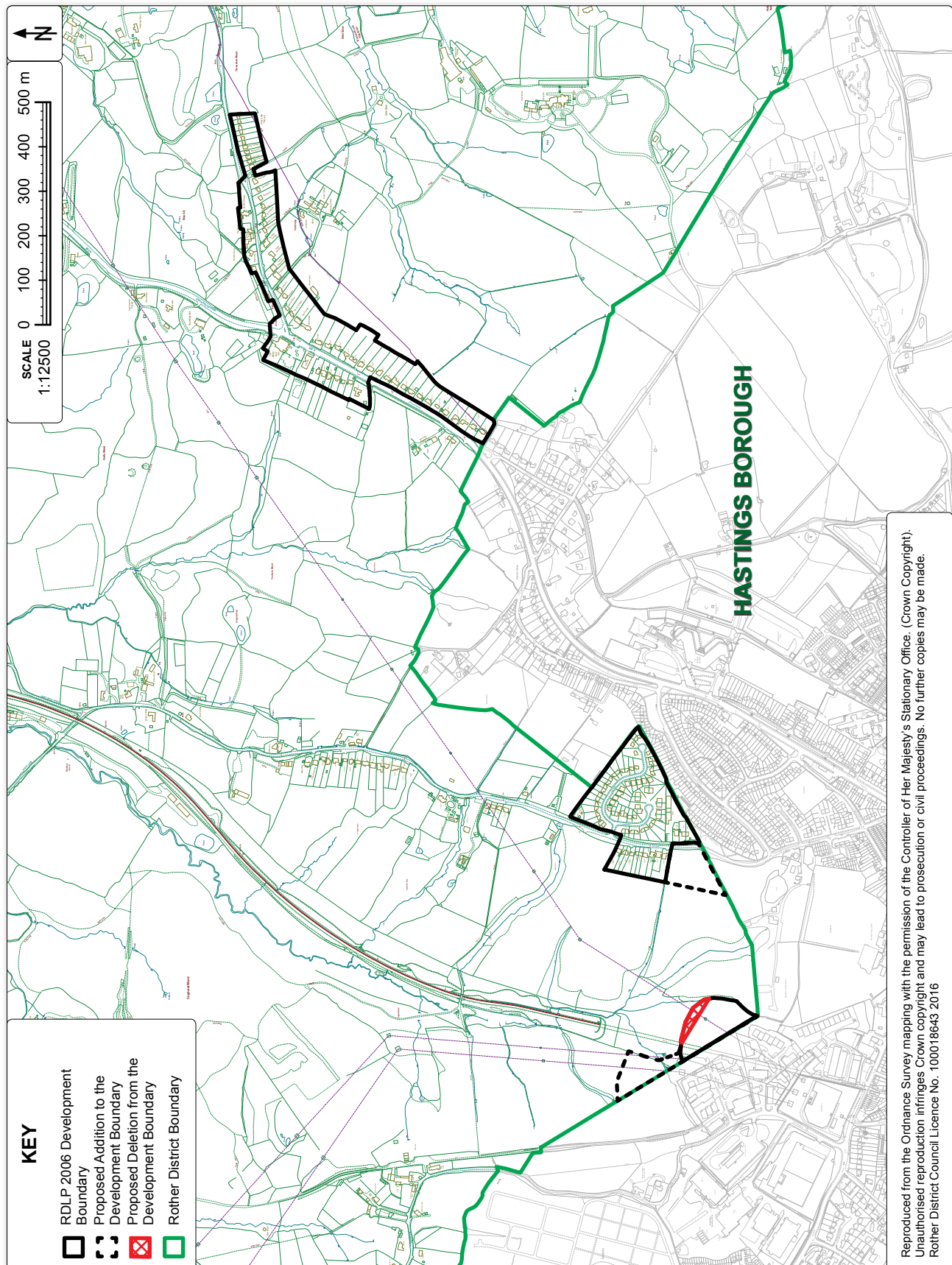
QUESTION 53: Do you agree with the requirements of Policy HAS5, including the boundary as defined in the Policies Map? If not, how would you wish to see it amended?

Development Boundary

- 14.26. Policy OSS2 of the Core Strategy establishes the principle of development boundaries within Rother District but did not define their boundaries. The 2006 Local Plan 'saved policy' DS3 defines the physical development boundaries on the relevant 'Inset Maps'. It is therefore the role of this document to review these development boundaries. It follows that the preferred development sites discussed earlier in this Chapter should be included within revised settlement development boundaries along the Hastings Fringes. These are shown in Figures 66 and 67 below.
- 14.27. Consideration is made to the scope for any small-scale development boundary amendments along the Hastings Fringes, where there may be development opportunities. As part of this review, amendments are reviewed as to whether sites are surrounded by development which have well-defined natural boundaries or topographical features, thereby creating a new defensible edge to the area. The function of the land and its relationship to the settlement are also important factors.
- 14.28. In reviewing the potential for small-scale development boundaries amendments along the Fringes, generally it is considered that there is little scope to provide infill and rounding off opportunities that are physically, functionally and visually well related to the existing urban area, taking account of any environmental development constraints. Typically those areas which are adjacent to the Fringes are open areas which visually relate to the open countryside rather than the urban areas of Hastings and their inclusion would harm the structure, form and character of the countryside.

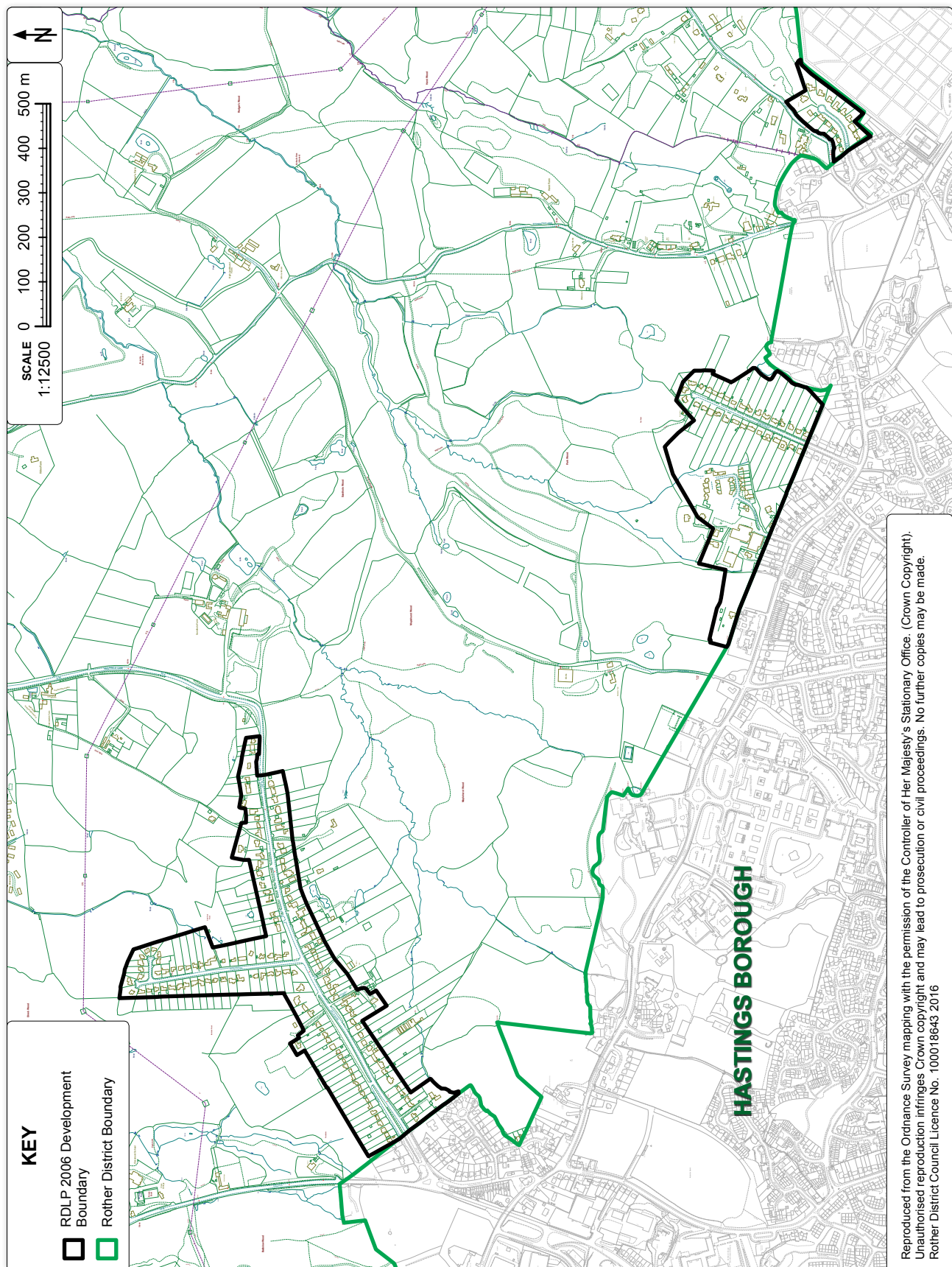
QUESTION 54: Do you agree with the recommendation regarding the Hastings Fringes development boundaries? If not, please explain how you wish the development boundaries to be applied to this area?

Figure 66. Hastings Fringe (East) Development Boundary Map



Hastings Fringes

Figure 67. Hastings Fringe (West) Development Boundary Map



15. Villages with Site Allocations

Beckley Four Oaks

Context

- 15.1. Beckley Four Oaks is linear in form, straddling the B2088. The village is situated some 1.2 miles east of Northiam and approximately 1.5 miles west of Peasmarch, which both offer a wider range of goods and services. The village is characterised by surrounding farmed pasture land, its weather board houses and ribbon development along a historic routeway.
- 15.2. Beckley Four Oaks and the surrounding countryside lie within the High Weald AONB. It is a landscape of gently undulating farmed countryside with large blocks of mixed woodland particularly to the south of the village, some of which are designated as Ancient Woodland.
- 15.3. The village is reasonably well served by local services with a primary school, recreation ground, village hall all actively used, however the loss of the local pub and the local garage/shop has impacted on the local community in recent years. There is a regular but limited bus service to Northiam, Rye and Hastings.

Development Provisions

- 15.4. Given the size of the village, the range of services available and consideration of the constraints in the locality, the Local Plan Core Strategy set a target of 20 additional dwellings on new sites in the village up to 2028. This remains the requirement.
- 15.5. The Council's Open Space, Sport and Recreation Study indicates a shortfall in provision of children's play space and amenity green space; the former is expected to be addressed by improvements to the existing children play area on Jubilee Field, which may benefit from Community Infrastructure Levy (CIL) payments from new development.

Villages with site allocations

Beckley Four Oaks

Site Options

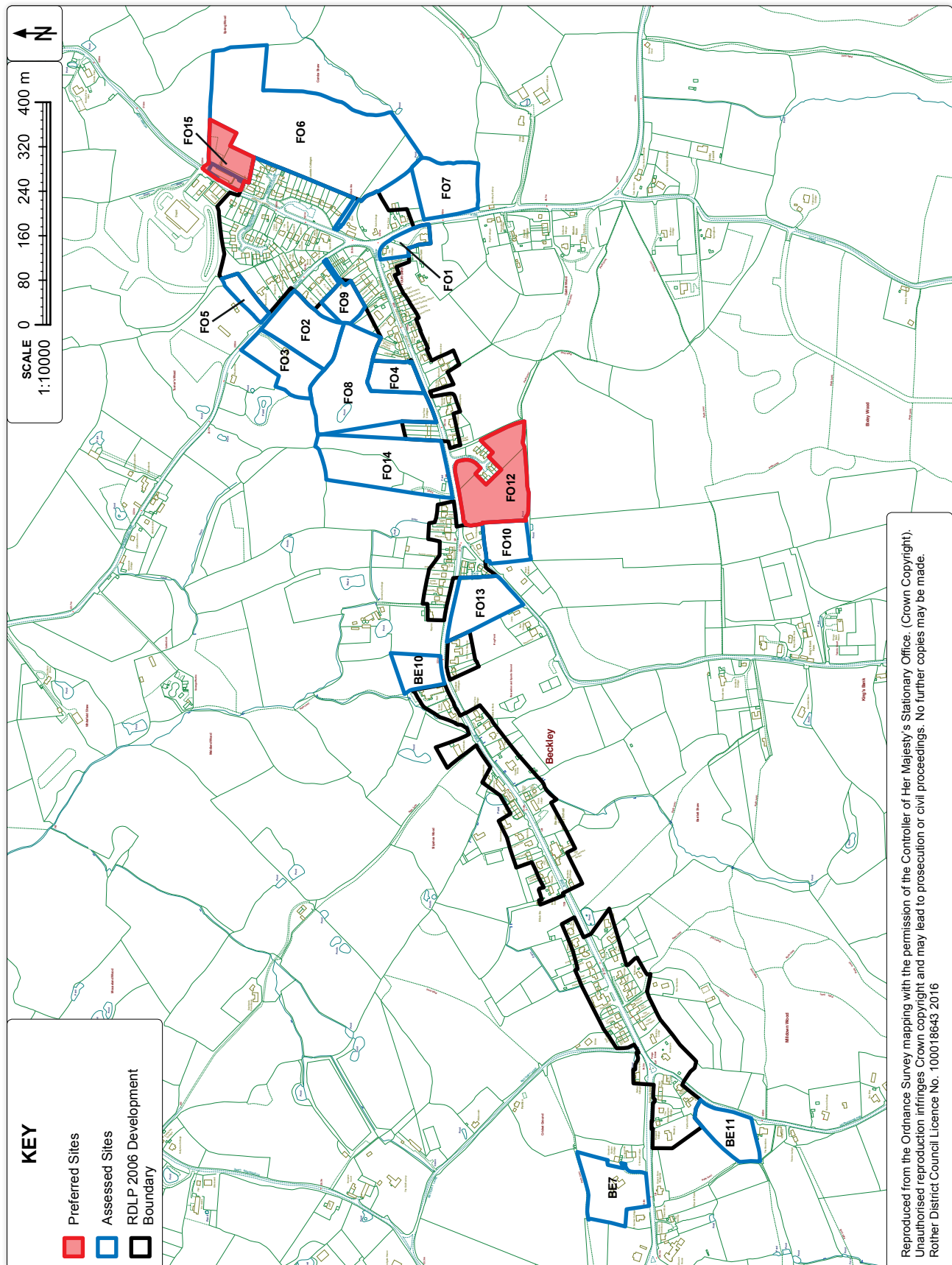
- 15.6. In total, 15 sites have been considered as potential allocations in order to meet the identified housing requirement for Beckley Four Oaks - see Figure 68 'Options Map' below. The sites are broadly located across the settlement with the majority abutting the existing settlement boundary.
- 15.7. A number of sites involved infilling of gaps along the village streetscape and this is resisted as they are seen as being integral to the character of the village. The impact of development on the wider AONB landscape has also been a factor, with many sites to the north of B2088 generally more exposed in the wider landscape than to the south of B2088. Other constraints, such as surface water flooding and impact on historic field patterns, have also been factors affecting some sites. All sites considered through the process are reviewed in Appendix 3.
- 15.8. It is proposed that the requirement for Beckley Four Oaks be accommodated on two relatively small sites.
- 15.9. Land south of Buddens Green (Ref: FO12) is relatively central to both Beckley and Four Oaks and relatively close to existing services. There is scope to consolidate the existing Buddens Close estate with a sympathetic development alongside open space that maintains and enhances the amenities and character of this part of the village.
- 15.10. The other site is on the northern edge of the village to the east of Hobbs Lane and comprises an existing brownfield site known as the Former Manroy Engineering Works (Ref: FO15) and a small adjacent area of farmland which creates a more logical development area. The site abuts the existing settlement boundary and relates well to the main built-up area and are relatively contained in the landscape. It is an opportunity to redevelop a brownfield site that has been vacant for a number of years.

QUESTION 55: Do you agree with the preferred sites for development at Beckley Four Oaks? If not, which sites should be preferred?

Villages with site allocations

Beckley Four Oaks

Figure 68. Beckley Four Oaks Options Map



Villages with site allocations

Beckley Four Oaks

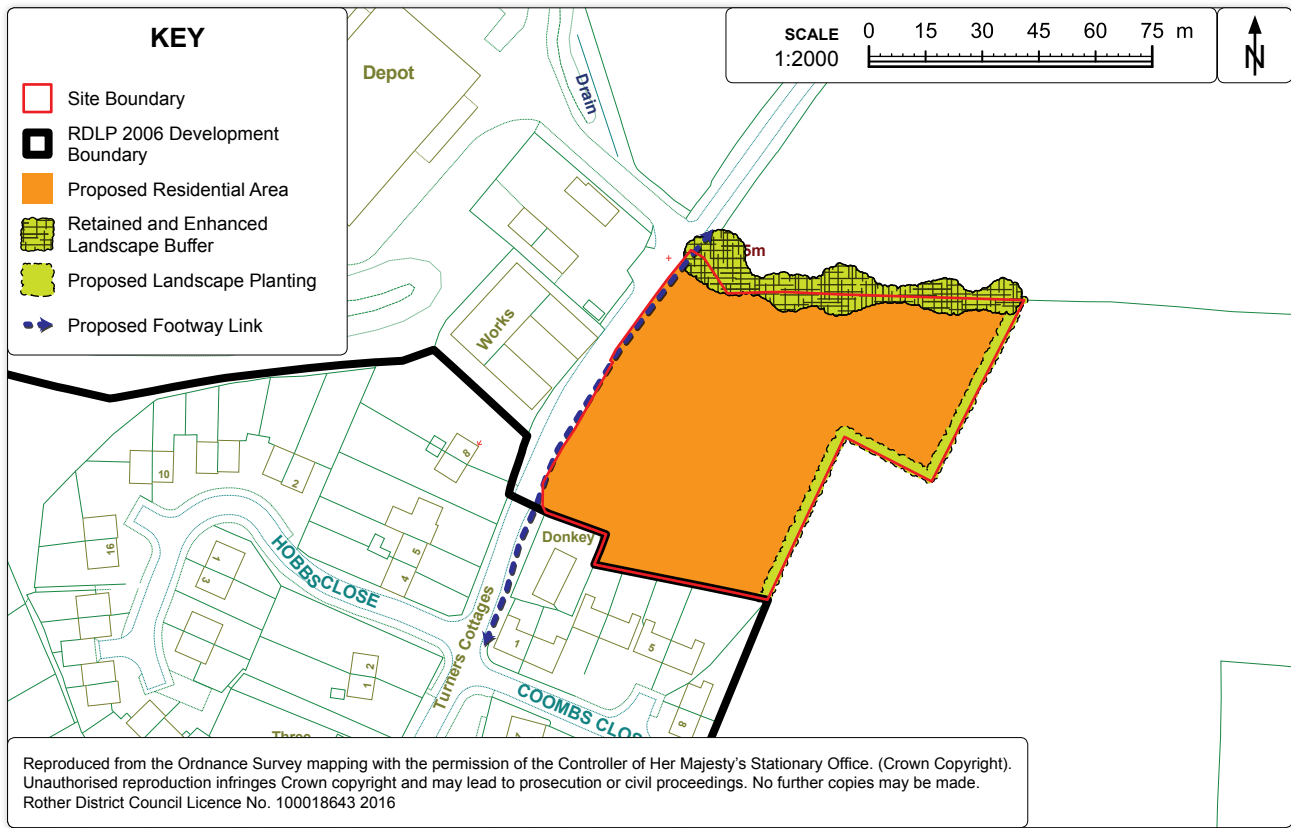
Preferred Site: Land east of Hobbs Lane, Beckley Four Oaks (Ref: FO15)

Existing use(s)	Former Engineering Works and Farmland.
Size	0.62 ha
Key constraints/opportunities	<p>FO15 comprises of the Former Manroy Engineering Works and a small part of the adjacent farmland, which will 'round off' and consolidate the north-east edge of the village.</p> <p>The former armaments factory has been vacated for a number of years and despite marketing it has failed to find another occupier. The change of use to residential development is accepted. It is expected a ground survey will be undertaken as part of the application process and potential contamination of the site mitigated through appropriate measures.</p> <p>To minimise visual intrusion into the wider countryside to the north and east, the applicant will be expected to plant landscape screening along the northern and eastern boundary using native species. To integrate new development with the existing village, a new footway is required along Hobbs Lane.</p>
Proposed use(s)	Housing.
Developable area	0.62ha
Capacity	12 dwellings.

Figure 69. FO15 Aerial Map



Figure 70. FO15 Detail Map



Policy BEC1: Land east of Hobbs Lane, Beckley Four Oaks

Land east of Hobbs Lane, Beckley Four Oaks (Ref: FO15) as shown on the Policies Map, is allocated for housing. Proposals will be permitted where:

- (i) some 12 dwellings will be provided within the identified residential area as shown on the Policies Map, of which 40% should be affordable;
- (ii) access is achieved off Hobbs Lane;
- (iii) screen tree and hedgerow planting employing native species is provided on the northern and eastern boundaries of the site; and
- (iv) a new footpath is provided to link the new development to the existing Hobbs Lane footway.

QUESTION 56: Do you agree with the requirements of Policy BEC1? If not, how would you wish to see it amended?

Villages with site allocations

Beckley Four Oaks

Preferred Site: Land south of Buddens Green Beckley Four Oaks (Ref: FO12)

Existing use(s)	Pasture.
Size	1.63ha
Key constraints/opportunities	<p>The area of development should be limited to the area south of Buddens Green as it is largely enclosed by the existing estate to the north and a mature tree belt to the south and west, limiting the visual impact on the wider AONB landscape.</p> <p>Access can be achieved off Buddens Green.</p> <p>A western extension of development is not considered appropriate, as this area has been recognised, via appeals, as providing an important, characteristic open gap along the road frontage, with views over it. Furthermore, the north-eastern part already provides an amenity open space function for the existing homes. It is considered that this could be enhanced as an amenity for the existing and new homes, as well as accommodating SuDS features to mitigate surface water flooding. Hence, it is proposed to incorporate this area as open, amenity land within the proposed allocation. This will also help address the shortfall against the recognised standard, as identified in the Council's Open Space, Sport and Recreation Study.</p> <p>There is an opportunity to strengthen the western boundary of the site to reinforce a historic field boundary.</p> <p>Development is restricted due to the shadowing effect of the adjacent trees.</p>
Proposed use(s)	Comprehensive development to provide housing and open, amenity land.
Developable area	0.4ha
Capacity	Some 8 dwellings.

Villages with site allocations Beckley Four Oaks

Figure 71. FO12 Aerial Map

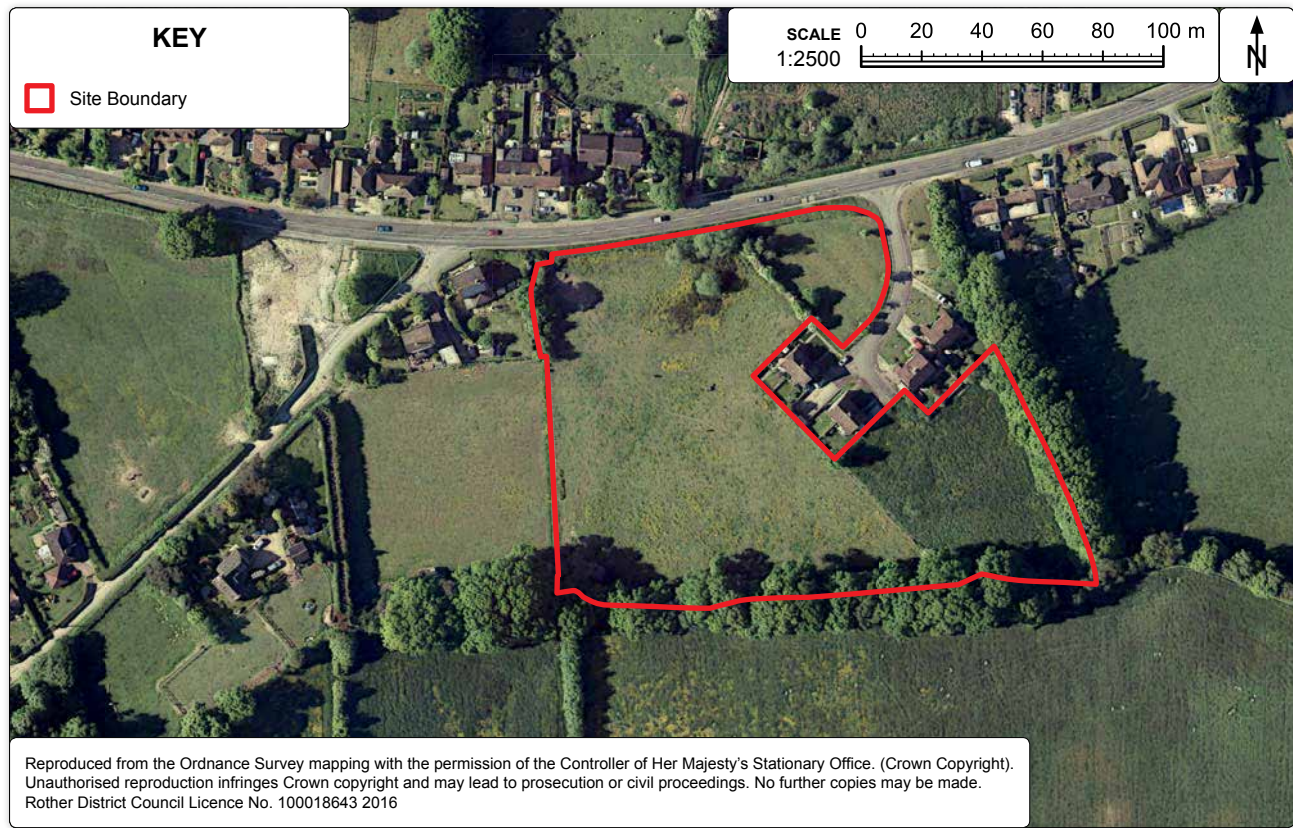
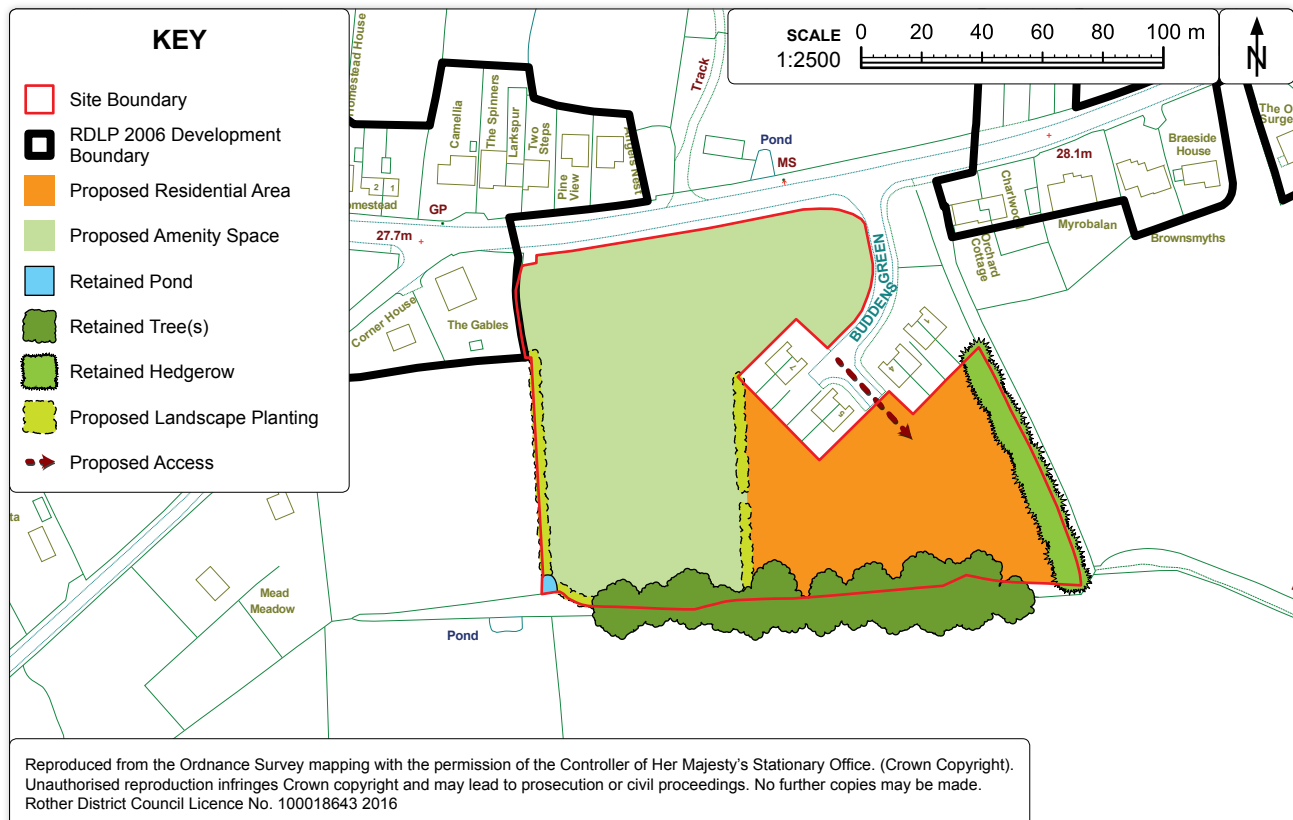


Figure 72. FO12 Detail Map



Policy BEC2: Land south of Buddens Green, Beckley Four Oaks

Land south of Buddens Green, Beckley Four Oaks (Ref: FO12) as shown on the Policies Map, is allocated for housing and Local Green Space. Proposals will be permitted where:

- (i) some 8 dwellings are provided within the residential area as indicated on the Policies Map;
- (ii) access is provided though the Buddens Green estate;
- (iii) financial contributions are made towards affordable housing; and
- (iv) existing landscaped boundaries around the site are retained and enhanced along with the creation of new landscape buffers.

QUESTION 57: Do you agree with the requirements of Policy BEC2? If not, how would you wish to see it amended?

Development Boundary

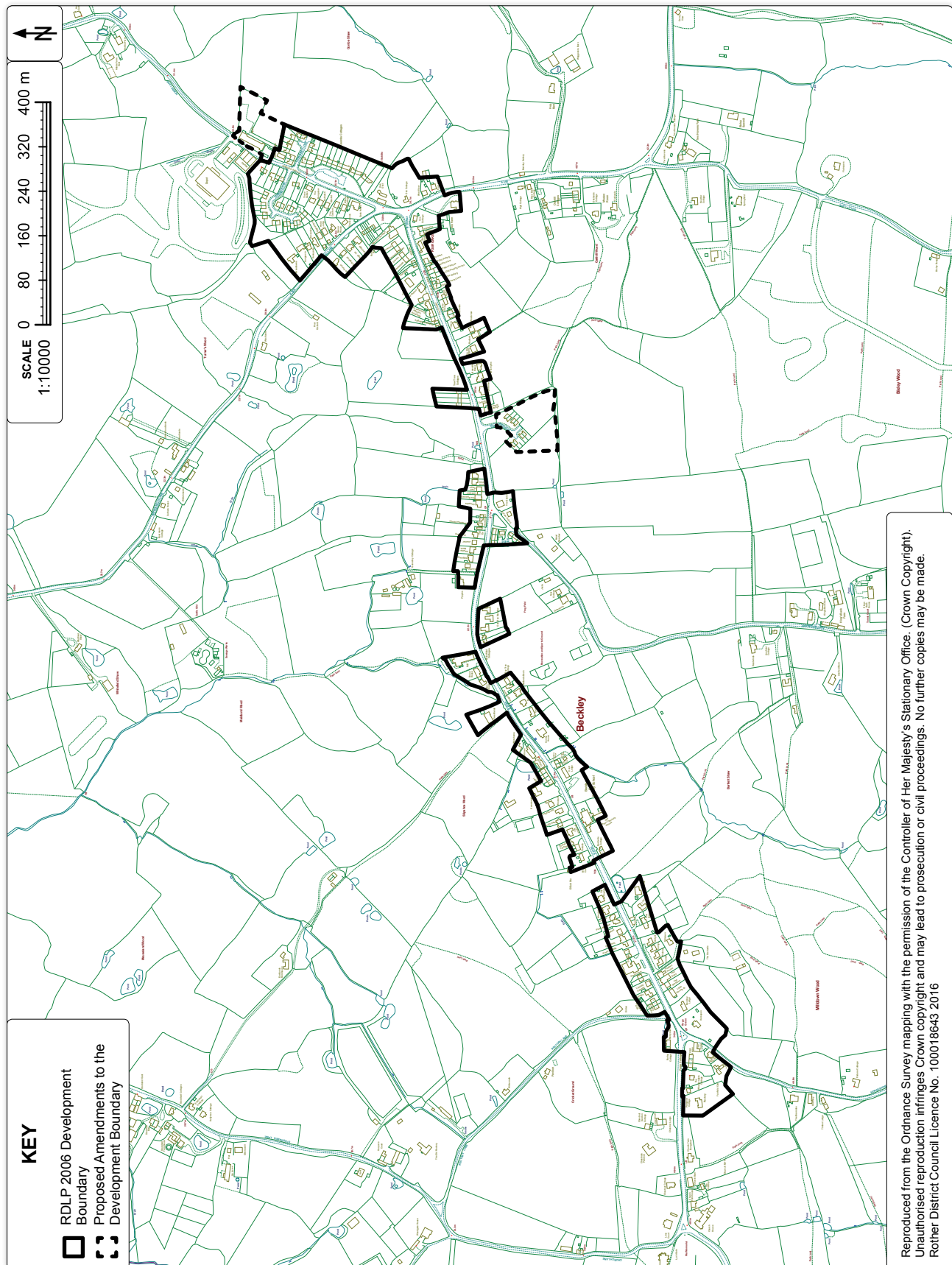
- 15.11. The purpose of development boundaries is set out in Chapter 11.
- 15.12. It is proposed to amend the development boundary as set out on Figure 73 below.
- 15.13. The proposed amendment to the development boundary will reflect the new allocations in the village.

QUESTION 58: Do you agree with the proposed development boundary? If not, how would you wish to see it amended?

Villages with site allocations

Beckley Four Oaks

Figure 73. Four Oaks Development Boundary Map



Broad Oak

Context

- 15.14. The village of Broad Oak is situated approximately 8 miles north of Hastings and 4 miles south of Northiam. The B2089 bisects the village east to west along the ridge, while the A28 runs north to south through the village.
- 15.15. Broad Oak is closely linked to the neighbouring villages of Cackle Street and Brede to the south and the three of them form a relatively compact cluster of settlements running north-south along the A28. The majority of Broad Oak has expanded north of the B2089, away from the more exposed slopes of the land south of B2089. The village has a good range of local services to meet the basic needs of the community including a shop, public house, a recreation ground, a church and primary school.

Development Provisions

- 15.16. Given the size of the village, the range of services available and consideration of the constraints in the locality, the Local Plan Core Strategy set a target of 50 dwellings on new sites in the village up to 2028. This remains the requirement. Work is being carried out to undertake a Housing Needs Survey for the village. The results will inform affordable housing provision on potential sites coming forward in the village.
- 15.17. It is noted that the Council's Open Space, Sport and Recreation Study identified a shortfall in allotment provision in Broad Oak.

Site Options

- 15.18. In total, 13 sites were assessed to meet the housing requirement for Broad Oak. The majority of sites about the existing development boundary - see Figure 74: 'Options Map' below. A number of sites were discounted because development would come into conflict with an environmental designation such as Ancient Woodland or the site is visually exposed in the wider AONB landscape. Sites were also discounted because they not did provide adequate safe access arrangements. Please refer to Appendix 3 for further details regarding assessment of individual sites.
- 15.19. The housing requirement for Broad Oak may be accommodated on two preferred sites. Land west of Northiam Road (Ref. BO16) is an amalgam of three SHLAA sites, two within the existing development boundary and the adjoining field, which is relatively well contained in the landscape. This site can also accommodate local allotments.

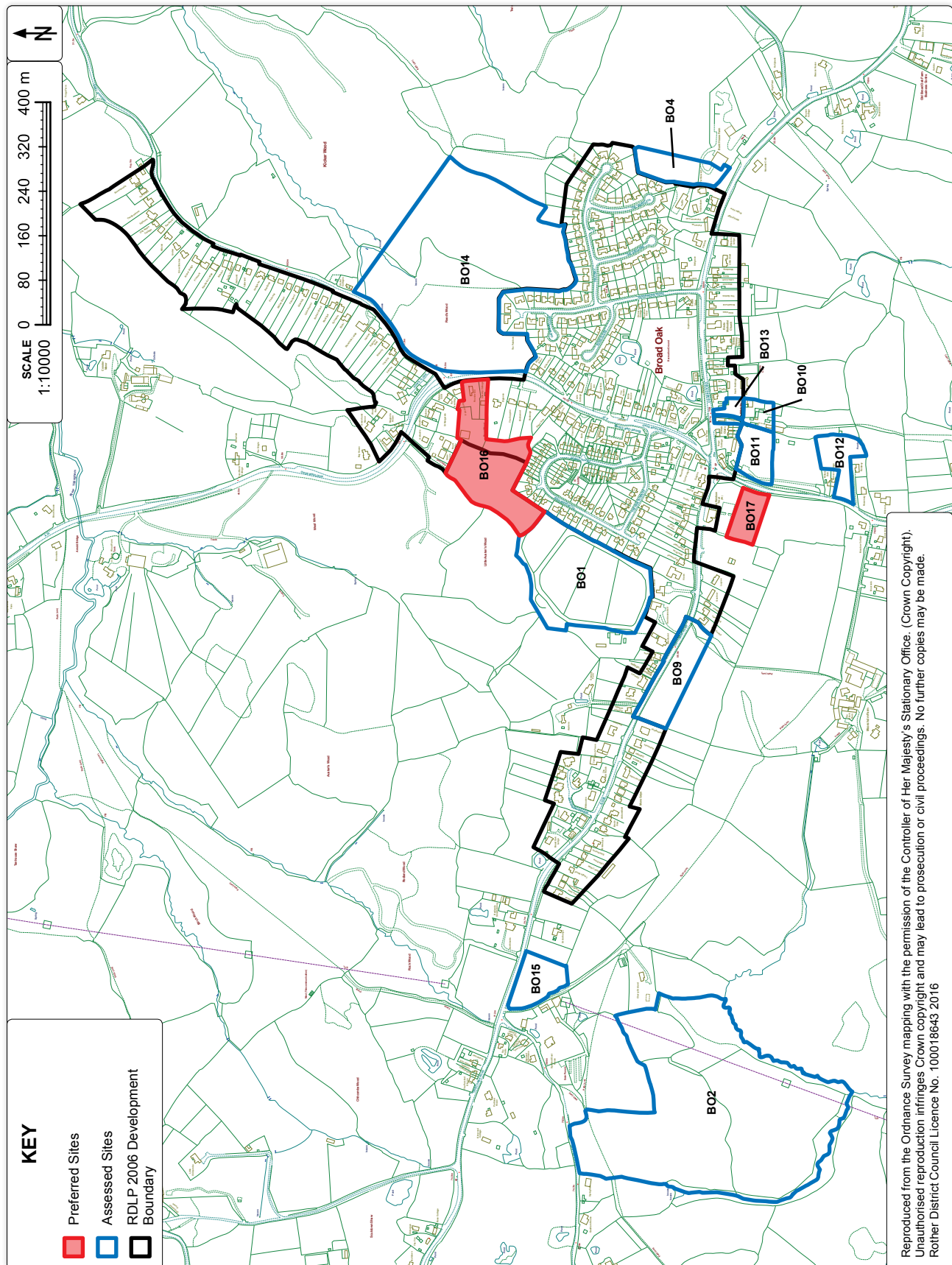
- 15.20. Land south of the Rainbow Trout (Ref. BO17) is also well contained in the landscape as well as being central to the village and well placed to local services. Access can be provided via Ostler Field to the west.

QUESTION 59: Do you agree with the preferred sites for development at Broad Oak? If not, which site(s) should be preferred?

Villages with site allocations

Broad Oak

Figure 74. Broad Oak Options Map



Preferred Site: Land west of A28, Northiam Road, Broad Oak (Ref: BO16)

Existing use(s)	Two residential properties and their curtilages, together with adjoining pasture land.
Size	2.2 ha
Key constraints/opportunities	<p>The site has a frontage to the A28 within the existing built-up area, with two adjoining properties in the same ownership, at least one of which would be demolished as part of the development. A new single access point off the A28 Northiam Road would be required to serve both the new dwellings.</p> <p>The site extends to the rear to include a relatively narrow strip of open land with well-treed boundaries running behind several properties, as well as the field behind, currently under grass, which is in separate ownership. The site should be bought forward as a comprehensive development. A buffer would be required to the Ancient Woodland of Little Austen's Wood immediately to the west. This should be kept as natural as possible. All planting should be native species.</p> <p>An existing public footpath along the western boundary should be retained and a link provided to it through the development. Trees in the centre of the site within the hedgerow should be retained as far as possible. Any layout design should be informed by a Tree Survey. The disposition of the strip of land in the south east corner, relatively flat and well contained by trees, is proposed to be new allotments for the village, for which a need has been recognised and is supported by the Parish Council. SuDS may also be required in this area to manage surface water flood risk. The site is fairly central to the village, while accessibility may be improved further if a pedestrian link to the south via the Tillingham View estate could be created. This should be investigated further, as should parking requirements, although a small layby may suffice.</p> <p>Affordable Housing provision will be provided on-site. At this point the normal requirement of 40% is assumed, this may increase if the ongoing Housing Needs Survey identifies a higher requirement.</p>
Proposed use(s)	Housing and allotments.
Developable area	1.6ha
Capacity	Some 40 dwellings.

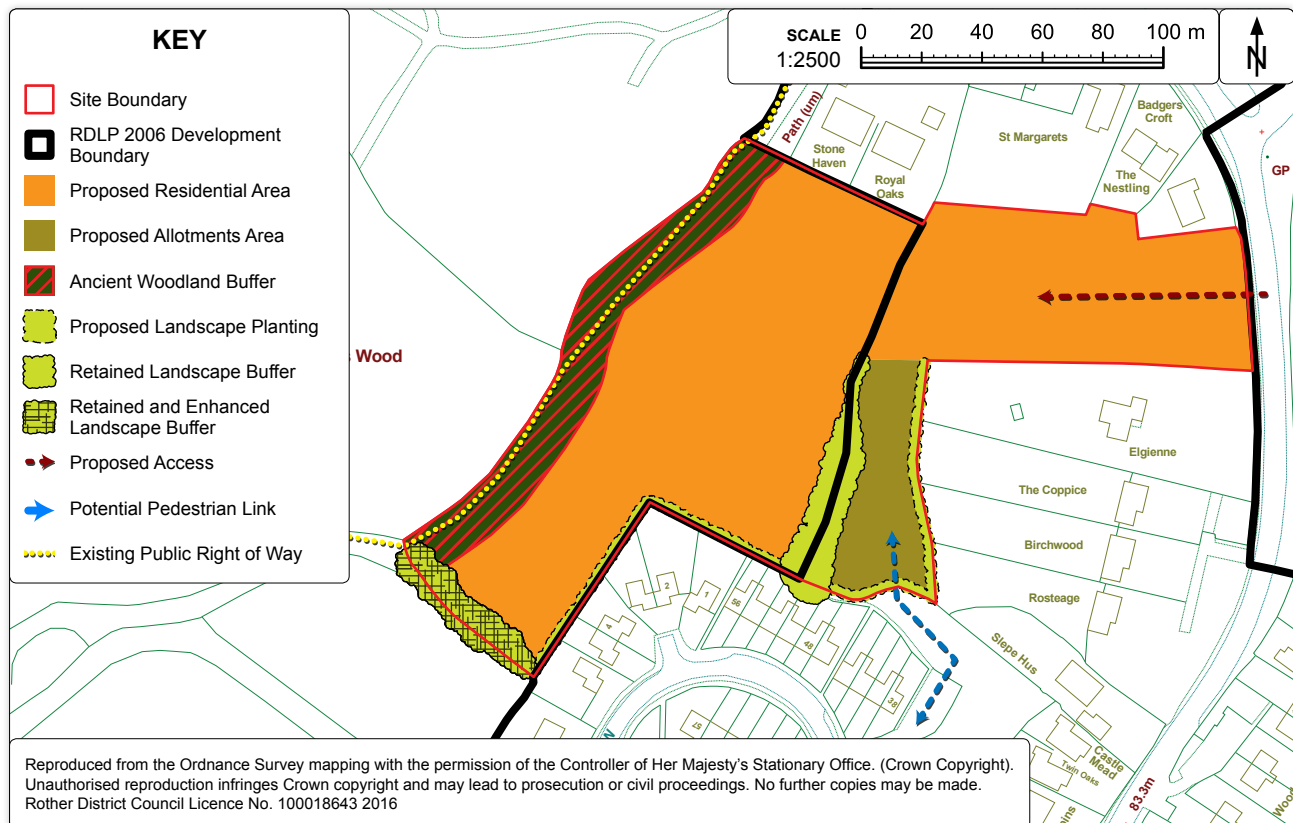
Villages with site allocations

Broad Oak

Figure 75. BO16 Aerial Map



Figure 76. BO16 Detail Map



Policy BRO1: Land west of A28, Northiam Road, Broad Oak

Land west of A28, Northiam Road, Broad Oak (Ref: BO16) as shown on the Policies Map, is allocated as a comprehensive scheme for housing and allotments. Proposals will be permitted where:

- (i) some 40 dwellings will be provided within the identified residential area as shown on the Policies Map, of which 40% should be affordable;
- (ii) a new access is achieved off A28 Northiam Road;
- (iii) allotments to be provided within the area shown on the Policies Map;
- (iv) screen tree and hedgerow planting employing native species is provided on the boundaries of the site; and
- (v) a buffer zone of at least 15 metres is provided to the Ancient Woodland.

QUESTION 60: Do you agree with the requirements of Policy BRO1? If not, how would you wish to see it amended?

Preferred Site: Land south of the Rainbow Trout Pub, Broad Oak (Ref: BO17)

Existing use(s)	Meadow.
Size	0.49ha
Key constraints/opportunities	<p>The rectangular site is located behind the public house the Rainbow Trout but is landlocked. BO17 is visually contained in the wider landscape. The recent completion of the adjacent estate of 13 dwellings for local needs to the west further consolidates this location as being sustainable with good access to local services and amenities.</p> <p>Access into BO17 will be delivered through the existing estate via Ostler Field to the west.</p> <p>Additional screen planting along boundaries of the site, especially on the southern boundary, will create a long-term, well-defined boundary.</p> <p>Affordable Housing provision will be provided on-site. At this point the normal requirement of 40% is assumed, this may increase if the ongoing Housing Needs Survey identifies a higher requirement.</p>
Proposed use(s)	Housing.
Developable area	0.49ha
Capacity	Some 11 dwellings.

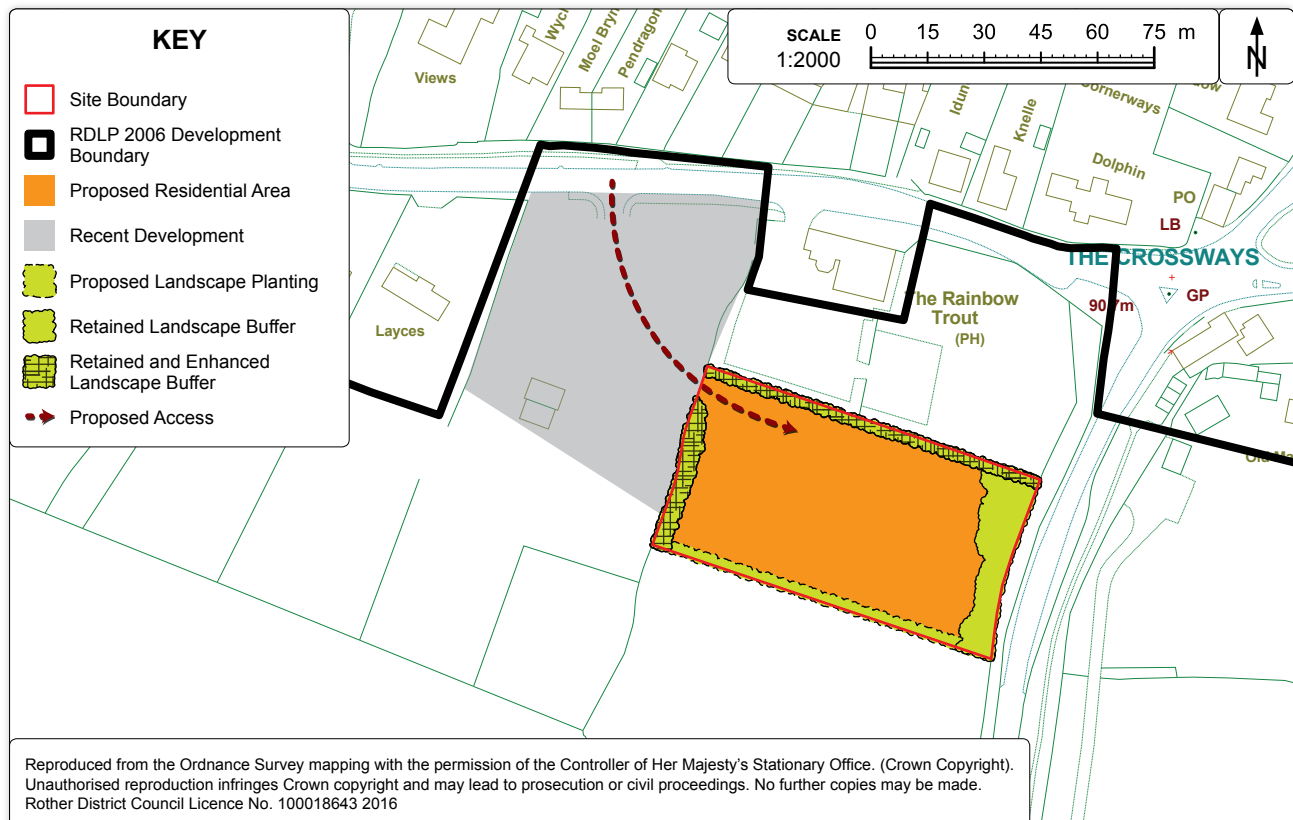
Villages with site allocations

Broad Oak

Figure 77. BO17 Aerial Map



Figure 78. BO17 Detail Map



Policy BRO2: Land south of the Rainbow Trout Pub, Broad Oak

Land south of the Rainbow Trout Pub, Broad Oak (Ref: BO17) as shown on the Policies Map, is allocated for housing. Proposals will be permitted where:

- (i) some 11 dwellings will be provided within the identified residential area as shown on the Policies Map, of which 40% should be affordable;
- (ii) a new access is achieved off Ostler Field; and
- (iii) screen tree and hedgerow planting employing native species is provided on the boundaries of the site.

QUESTION 61: Do you agree with the requirements of Policy BRO2? If not, how would you wish to see it amended?

Development Boundary

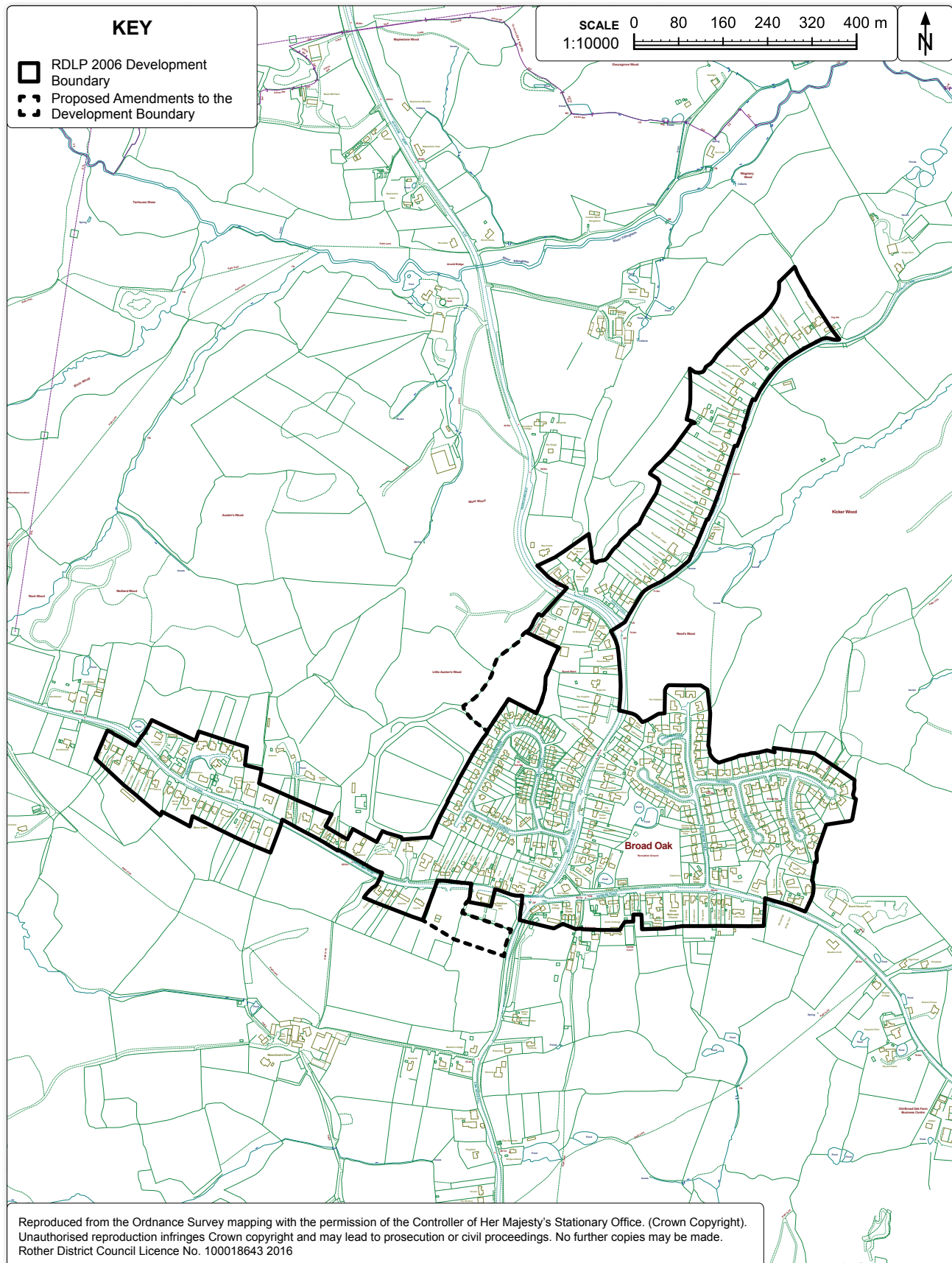
- 15.21. The purpose of development boundaries is set out in Chapter 11.
- 15.22. It is proposed to amend the development boundary as set out on Figure 79 below.
- 15.23. The proposed amendment to the development boundary will reflect the new allocations in the village, as well as the recently built Ostler Way.

QUESTION 62: Do you agree with the proposed development boundary? If not, how would you wish to see it amended?

Villages with site allocations

Broad Oak

Figure 79. Broad Oak Development Boundary Map



Camber

Context

- 15.24. Camber is located on the East Sussex coast, close to the border with Kent. Camber has a small population but its large white sandy beach – Camber Sands - can attract significant number of weekend and day tripper visitors, being well-connected to London, Kent and Sussex by road. However, it is not well connected by rail, with the closest station being in Rye. These population fluctuations have a significant impact on the role of the village and its ability to meet the service requirements of both residents and visitors successfully.
- 15.25. Camber is situated on a low lying area of coastal levels, with a relatively unpopulated surrounding hinterland. The settlement is bounded to the north and east by the extensive flat, open levels of Walland Marsh SSSI, stretching into Kent and forming part of the great Romney Marsh tract of levels. The whole of the village falls within Flood Zones 3 as identified by the Environment Agency.
- 15.26. Camber is relatively well served by local amenities, with shops, a village hall, pubs and restaurants, but lacks a primary school. A branch doctors surgery services is provided at Camber Memorial Hall. Residents would generally look to Rye, as the main service centre for the eastern half of district, for other needs.
- 15.27. Camber is one of the more deprived communities in Rother, being geographically and economically isolated and dependent on a highly seasonal tourist trade. The regeneration of Camber is identified in the Corporate Plan as one of the Council's long-term executive priorities.

Development Provisions

- 15.28. Given the size of the village, range of services available and the environmental constraints of flood risk and nature conservation designations in the locality, the Local Plan Core Strategy set an appropriate target of 20 additional new dwellings on sites in the village up to 2028. This remains the target.
- 15.29. The adopted Camber Supplementary Planning Document (SPD) (2014) provides the current planning policy framework to steer development and change in the village.

Site Options

- 15.30. In total, 10 sites of varying sizes have been considered in order to meet the housing requirement for Camber - see Figure 80: 'Options Map' below. The sites are broadly located in and around the village. Greenfield sites abutting the development boundary are discounted because of flood risk concerns and their close proximity to the SSSI. Some sites have poor access. Another site had commercial constraints attached to it and its availability was not certain so it is also discounted.
- 15.31. It is proposed that the housing requirement is accommodated on two brownfield sites within the existing settlement boundary. Both the Former Putting Green Site (Site Ref: CM2) and Central Car Park Site (Ref: CM6a) sites are relatively central to the village with good access to the main amenities Camber has to offer. The proposals effectively reaffirm the principles advocated by the adopted Camber Village Supplementary Planning Guidance (SPD). For further details of assessment of individual sites please refer to Appendix 3.

QUESTION 63: Do you agree with the preferred sites for development at Camber? If not, which sites should be preferred?

Preferred Site: Land at the Former Putting Green, Camber (Ref: CM2)

Existing use(s)	Car Park.
Size	0.2ha
Key constraints/opportunities	<p>The Former Putting Green site is currently a car park opposite the dunes. It is located on the Old Lydd Road and is on a prime route for visitors and residents heading towards Camber Sands. The site is centrally located and within easy walking distance of all the main village amenities.</p> <p>It is a brownfield site within the settlement boundary and lies within Flood Zones 2 and 3. It is expected a Flood Risk Assessment will be submitted as part of the application.</p> <p>A mix of housing and commercial development is considered appropriate for this site. Residential development should not be provided on the ground floor due to flood risk but commercial uses would be acceptable on the ground floor.</p> <p>Built development should be focused on the southern section of the site to avoid overlooking and rights to light issues for the existing adjacent buildings to the north and west in particular.</p> <p>Proposals should seek to provide 'active' frontages on the southern edge to the Old Lydd Road.</p> <p>The dunes opposite the site are significant both as major landscape feature and as a Site of Special Scientific Interest (SSSI) and the protection and management of the dunes are a key landscape and ecological objective of the adopted SPD. The redevelopment of the Former Putting Green site should not destabilise the integrity of the dunes.</p> <p>Please refer to the Council's adopted Camber Village SPD for further guidance.</p>
Proposed use(s)	Housing and Commercial.
Developable area	0.2ha
Capacity	10

Figure 81. CM2 Aerial Map



Figure 82. CM2 Detail Map



Policy CAM1: Land at the Former Putting Green Site, Camber

Land at the Former Putting Green Site, Camber (Ref: CM2) as shown on the Policies Map, is allocated for mixed use commercial and residential development. Proposals will be permitted where:

- (i) some 10 dwellings will be provided;
- (ii) in relation to the form of development, regard is given to the Council's adopted Camber Village Supplementary Planning Document (2014); and
- (iii) new access is achieved as shown on the Policies Map.

QUESTION 64: Do you agree with the requirements of Policy CAM1? If not, how would you wish to see it amended?

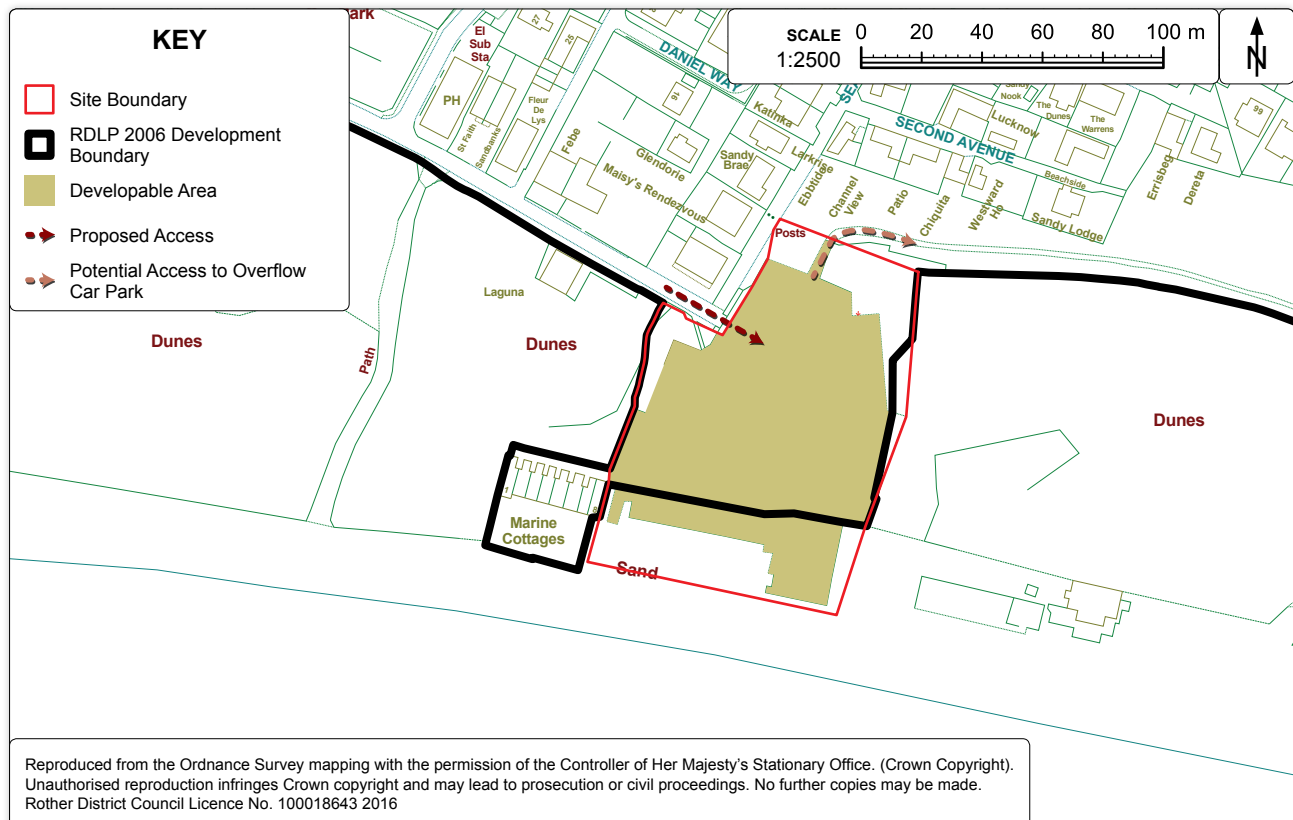
Preferred Site: Land at Central Car Park, Camber (Ref: CM6)

Existing use(s)	Car park, commercial and related operational uses.
Size	0.6ha
Key constraints/opportunities	<p>The principles supporting the redevelopment of the Central Car Park have been previously outlined in the adopted Camber Village Supplementary Planning Document (SPD), 2014. It could potentially be the catalyst for regeneration of Camber village by enhancing the tourist offer.</p> <p>A scheme should be brought forward as a comprehensive mixed use development to include housing, commercial, operational uses (beach patrol office, police/medical offices) and some car parking. Any loss of car parking on the Central Car Park site should be relocated to the adjacent overflow park in partnership with East Sussex County Council.</p> <p>The land at Central Car Park lies within Flood Zones 2 and 3. It is expected a FRA will be submitted as part of the application but no habitable rooms should be provided on ground floor.</p> <p>The dunes at Camber Sands are part of Dungeness, Romney Marsh & Rye Bay SSSI complex. The protection and management of the dunes are a key landscape and ecological objective of the SPD. The redevelopment of the Central Car Park site should not destabilise the integrity of the dunes.</p>
Proposed use(s)	Housing, Commercial, Operational Uses and Public Realm.
Developable area	0.5ha
Capacity	10

Figure 83. CM6 Aerial Map



Figure 84. CM6 Detail Map



Policy CAM2: Land at the Central Car Park, Camber

Land at the Central Car Park, Camber (Ref: CM6) as shown on the Policies Map, is allocated for a comprehensive mixed-use scheme to include residential, commercial and operational uses. Proposals will be permitted where:

- (i) in relation to the form of development, regard is given to the Council's adopted Camber Village Supplementary Planning Document (2014);
- (ii) some 10 dwellings will be provided within the developable area as shown on the Policies Map;
- (iii) access will be achieved off Old Lydd Road; and
- (iv) any loss of parking spaces as a result of redevelopment should be provided elsewhere in the locality.

QUESTION 65: Do you agree with the requirements of Policy CAM2? If not, how would you wish to see it amended?

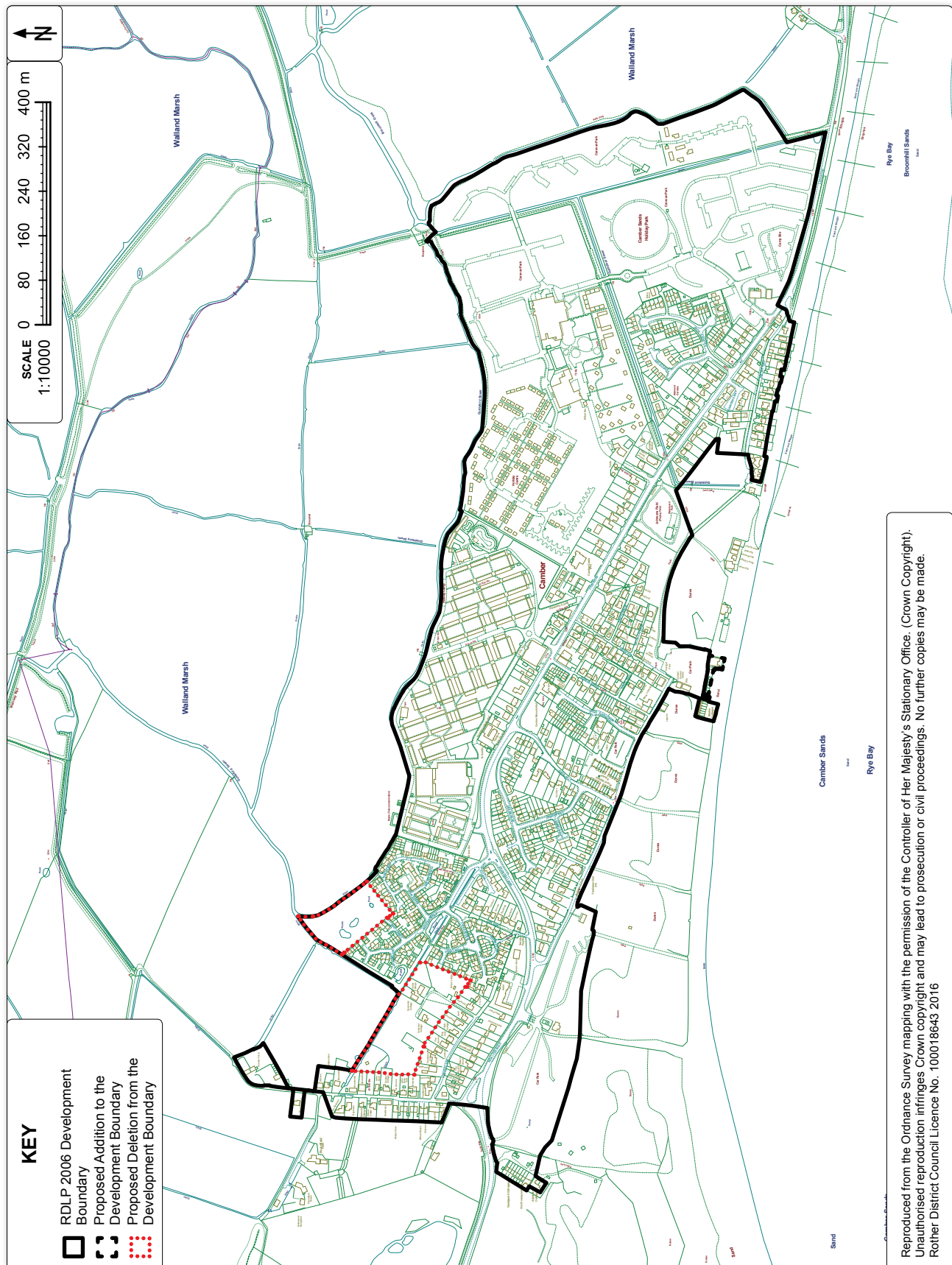
Development Boundary

- 15.32. The purpose of development boundaries is set out in Chapter 11.
- 15.33. It is proposed to amend the development boundary as set out on Figure 85 below.
- 15.34. The proposed amendment to the development boundary will reflect the new allocation in the village. In addition, the development boundary will be adjusted to exclude two parcels of land located on the northeast fringe of Camber. As the village lies in Flood Zone 3a, it is considered that this risk outweighs the identification of greenfield sites for further development.
- 15.35. Furthermore, the amendment of the development boundary to remove the parcel of land to the north of the White Sands Estate will prevent development coming forward in the Dungeness, Romney Marsh & Rye Bay SSSI.

QUESTION 66: Do you agree with the proposed development boundary? If not, how would you wish to see it amended?

Villages with site allocations Camber

Figure 85. Camber Development Boundary Map



Catsfield

Context

- 15.36. Catsfield is located on the B2204, two and a half miles from the historic town of Battle, just over a mile from Ninfield and about four miles north of Bexhill. As a 'Saxon, medieval and post-medieval settlement', the village is identified as an Archaeological Notification Area. Historically, the village grew up as a 'nucleated cross' and the main part of the village is built around three roads that form a triangle.
- 15.37. Catsfield is set amongst attractive undulating countryside of the Combe Haven Basin, although in terms of flood risk and habitat designations, it is the one of the least environmentally constrained villages in the District. The boundary of the High Weald AONB is immediately to the north of the village, but does not 'wash over' the village itself, nor include land to the south of the village.
- 15.38. Today, the village has a population approaching 400, with a high proportion of persons over 45. It has a good range of local services including a primary school, a general store/post office, butchers, public house, village hall, church recreation ground including a pavilion and children's play area, situated a little to the north of the village. However, it is not connected to the main gas grid.
- 15.39. Catsfield has many elements of a sustainable community, as well as having public transport links to the larger towns of Battle, Hastings and Bexhill. As such, it is defined as a 'local service village' within the Core Strategy. Nearby smaller hamlets include Catsfield Stream, Henley's Down, Parkgate and Stevens's Crouch.

Development Provisions

- 15.40. Catsfield is identified as having potential for 47 dwellings from new sites within the Core Strategy, which remains the target.
- 15.41. There is a relative shortage of amenity open space when the Council's open space standards are applied at a village level. New development offers the opportunity to address this. In addition, there is a local aspiration to provide a skate ramp or facility for older children/teenagers. This is most appropriately accommodated at the Catsfield Recreation Ground for which Community Infrastructure Levy (CIL) payments from new development will offer a potential funding source.

Site Options

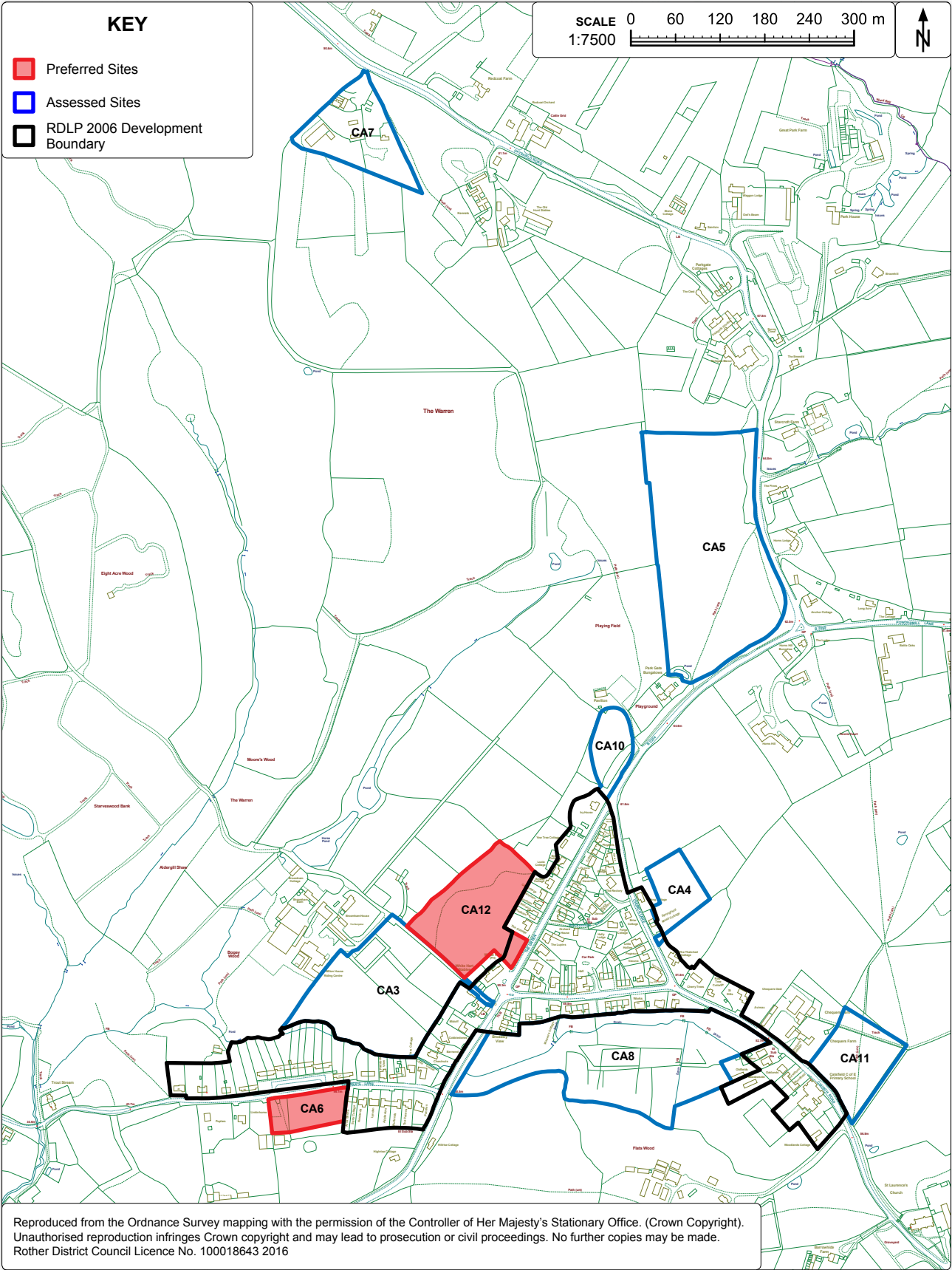
- 15.42. As shown on the Options Map below, a number of sites have been considered. Several were more rural in context and character, further from village services and/or detached from the village development boundary. The assessment of all sites is contained at Appendix 3.
- 15.43. Two sites - land to the rear of the White Hart (Ref. CA12) and land south of Skinner's Lane (Ref. CA6) - to the west of the village stand out as preferred options, being relatively contained from the wider countryside; accessible to local services; and relatively devoid of flood risk or environmental/heritage constraints. The larger site has the additional benefit of being well placed centrally to address the shortage of amenity open space by providing a village green for the benefit of the community.

QUESTION 67: Do you agree with the preferred sites for development at Catsfield? If not, which site(s) should be preferred?

Villages with site allocations

Catsfield

Figure 86. Catsfield Options Map



Preferred Site: Land to the rear of The White Hart, Catsfield (Ref: CA12)

Existing use(s)	Vacant greenfield site (scrub and rough grassland).
Size	1.65ha
Key constraints/opportunities	<p>Although within the AONB, the site is well contained and screened from the wider landscape and situated adjacent to village services and bus stop.</p> <p>Vehicle access would be via the Green/B2204. Its position is partially dictated by the presence of the existing pedestrian crossing, needing to be further north for safety reasons and to avoid conflict of movement. Pedestrian access should also connect to the 1066 Country Walk in the south-west corner of the site.</p> <p>The shortage of amenity open space in the village may be addressed by some provision alongside development. The southern frontage lends itself to the creation of a central green for the village, providing a potential location for small-scale community events. Locating the green here would have additional benefits of complementing the setting for the adjacent White Hart pub (which is a Grade II Listed Building) as well as being adjacent to the pedestrian crossing. In terms of future design it should benefit from the passive surveillance of residential properties fronting onto it.</p> <p>The lack of gas supply suggests renewable energy options (solar, ground source heat pumps) may be a particularly appropriate option here.</p> <p>Given that the adjacent B2204 has a poor accident record, provision of some street lighting and/or improved road markings may be necessary to meet highway safety requirements; this should be investigated with the Highway Authority.</p> <p>The historic field boundaries should be retained and would benefit from reinforced buffer planting of appropriate native species, as informed by ecological survey.</p>
Proposed use(s)	Residential and amenity open space.
Developable area	Developable area is partially constrained by vegetation/buffer planting as well as desirability of providing amenity open space, but estimated to be at least 1 hectare (subject to ecological surveys).
Capacity	35 dwellings (estimated) plus amenity open space (at least 0.3ha).

Villages with site allocations

Catsfield

Figure 87. CA12 Aerial Map

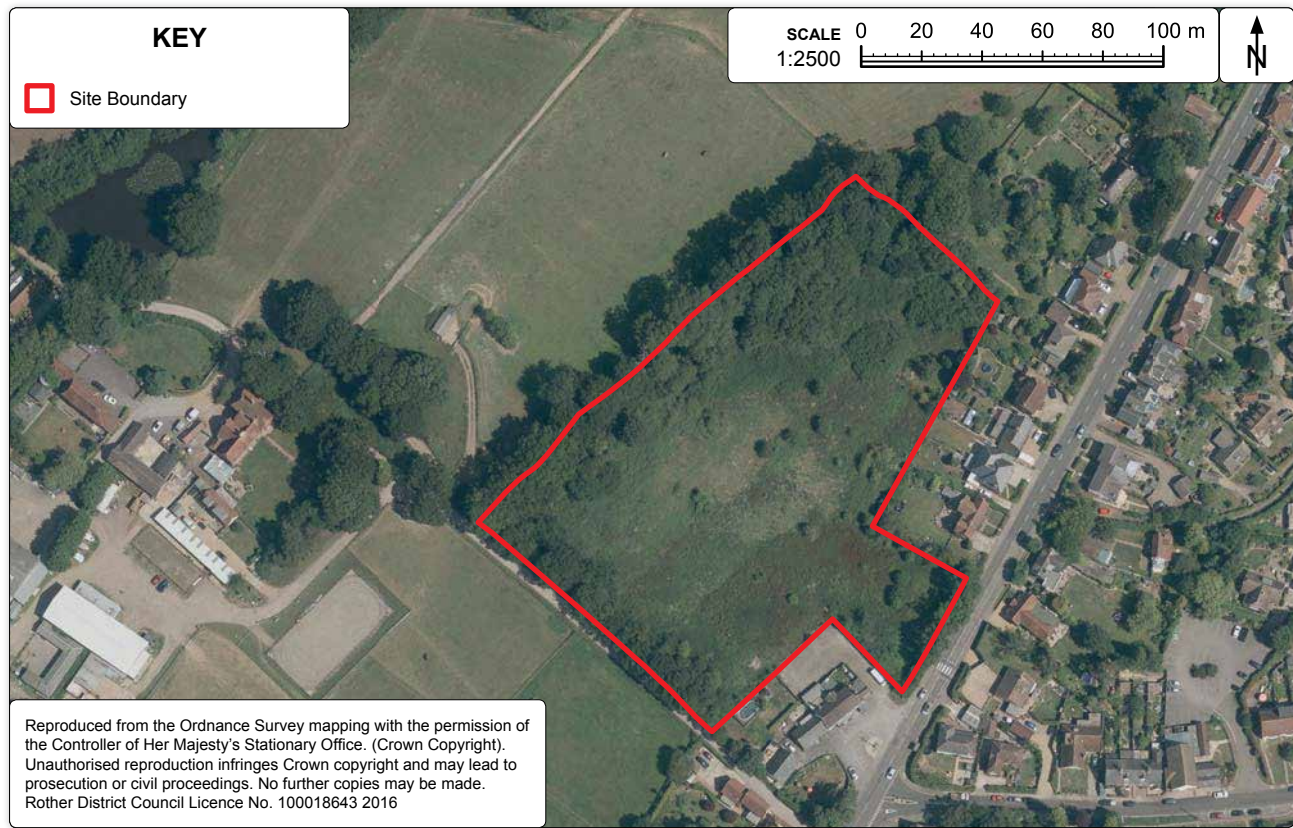


Figure 88. CA12 Detail Map



Policy CAT1: Land to the Rear of the White Hart, Catsfield

Land to the Rear of the White Hart, Catsfield, as shown on the Policies Map, is allocated for a comprehensive scheme comprising residential development and amenity open space in the form of a village green. Proposals will be permitted where:

- (i) approximately 35 dwellings-are provided, of which 40% are affordable;
- (ii) the development provides an amenity open space in the form of a village green of at least 0.3ha in size, extending across the road frontage and into the site and laid out to benefit from passive surveillance from adjacent dwellings;
- (iii) a new vehicle/pedestrian access is achieved off the B2204, together with a pedestrian access to the 1066 Country Walk;
- (iv) existing landscaped boundaries around the site are maintained and reinforced;
- (v) care is taken to respect the amenity value and setting of adjoining properties on the eastern boundary.

QUESTION 68: Do you agree with the requirements of Policy CAT1? If not, how would you wish to see it amended?

Preferred Site: Land South of Skinner's Lane, Catsfield (Ref: CA6)

Existing use(s)	Greenfield pasture
Size	0.46ha
Key constraints/opportunities	<p>A residential frontage scheme would be in accordance with the prevailing character.</p> <p>Loss of hedgerow should be avoided in line with Core Strategy Policy EN5 (viii). Design should seek to retain integrity of hedge as much as possible (i.e. via shared access point(s)). New native species hedgerow planting would be required at rear (south) of scheme to mitigate any partial loss of frontage hedgerow, habitat ideally connecting down the east boundary to provide screening for neighbouring properties.</p> <p>A frontage scheme with south facing back gardens has the additional benefit to maximise potential for passive solar gain, which will be beneficial in this location which lacks gas connections.</p> <p>Parking is required on-site, to limit on-street parking problems.</p> <p>SuDs will be required on site and at the low-lying frontage. The site is on the boundary of the Pevensey Levels hydrological catchment area, so two stages of appropriate treatment will be required, in accordance with the policy on sustainable drainage.</p> <p>A vehicle access connecting to the rear field should be retained to ensure the continued usage and viability of the field to south.</p> <p>The lack of footways means that enhancements for pedestrian access should be included alongside any proposal in order to improve connectivity to the village core. In order to satisfy Core Strategy Policy TR3(i) and to make the site acceptable in planning terms, contributions would be required to facilitate these.</p>
Proposed use(s)	Residential.
Developable area	0.35ha
Capacity	9

Villages with site allocations

Catsfield

Figure 89. CA6 Aerial Map

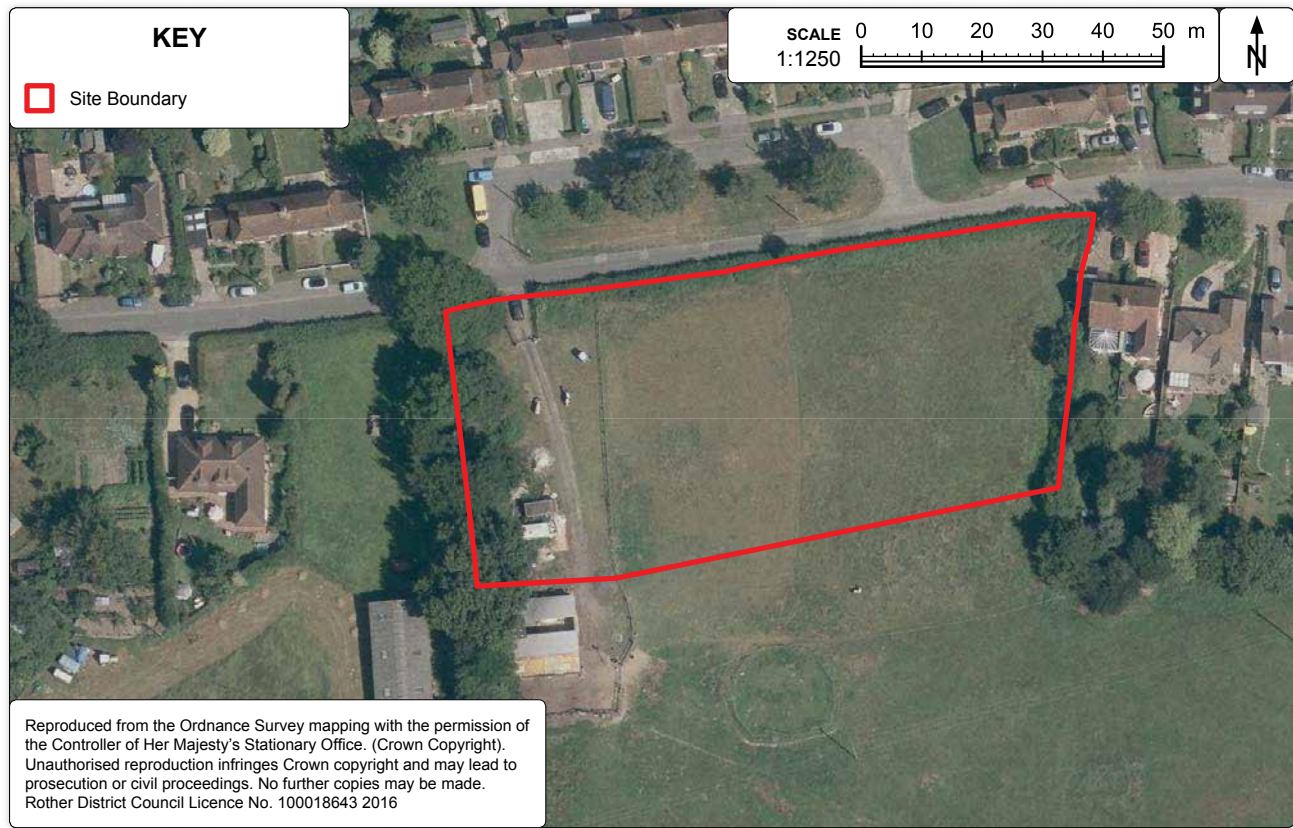
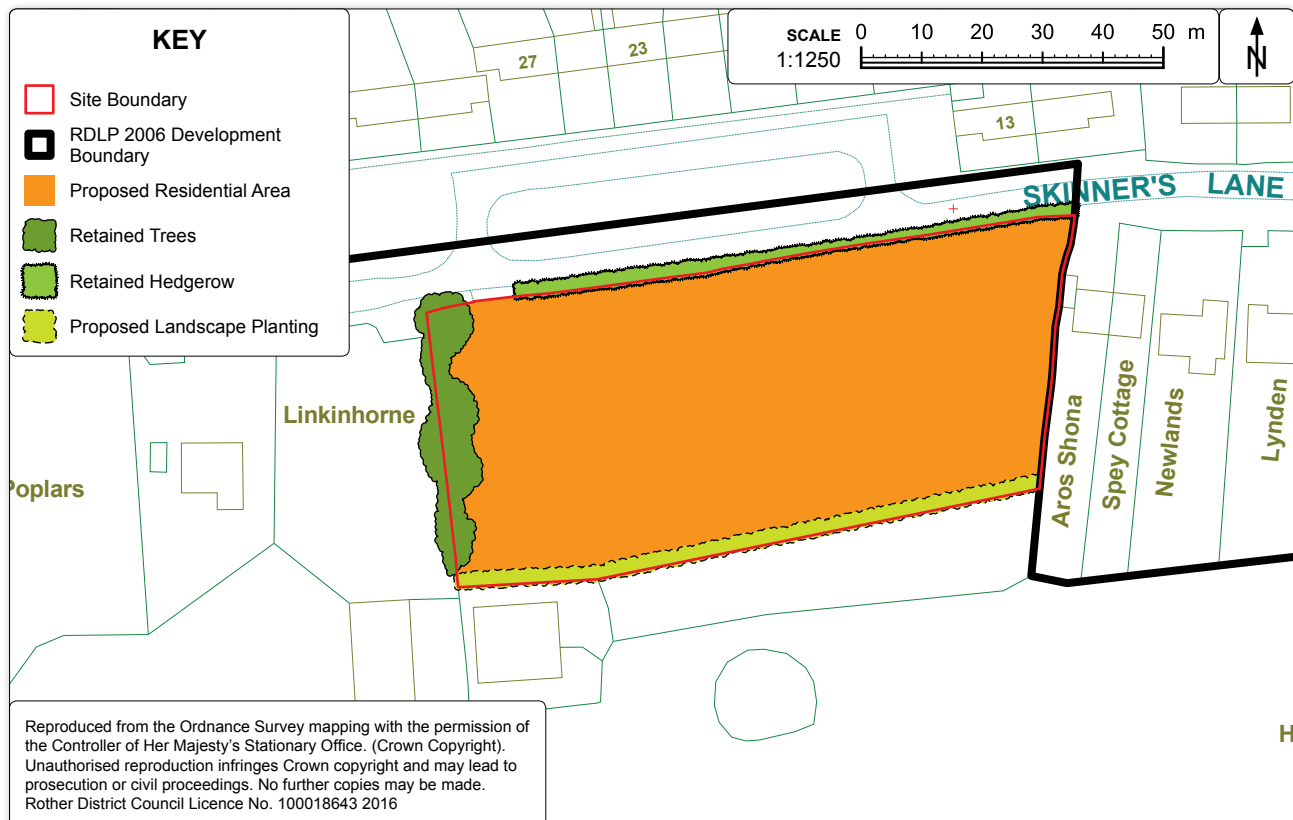


Figure 90. CA6 Detail Map



Policy CAT2: Land on Skinners Lane, Catsfield

Land on Skinners Lane, Catsfield, as shown on the Policies Map, is allocated for residential development. Proposals will be permitted where:

- (i) development is in a frontage facing scheme in line with prevailing character;
- (ii) some 9 dwellings are provided including provision for affordable housing;
- (iii) development is served by one or two vehicle access points off Skinners Lane, minimising the loss of hedgerow;
- (iv) existing landscaped boundaries around the site are maintained and reinforced, including:
 - (a) the retention of the frontage hedgerow (subject to access);
 - (b) a new native species hedgerow boundary is created along the extent of the south boundary.
- (v) care is taken to respect the amenity and setting of adjoining properties;
- (vi) an access is retained to the field to the south; and
- (vii) in accordance with Policy DEN5: 'Sustainable Drainage', at least two forms of appropriate Sustainable Drainage (SuDS) are incorporated.

QUESTION 69: Do you agree with the requirements of Policy CAT2? If not, how would you wish to see it amended?

Development Boundary

- 15.44. The purpose of development boundaries is set out in Chapter 11.
- 15.45. It is proposed to amend the development boundary to reflect the two allocations in the village. In addition, a small area of residential curtilage is proposed to be included within an extended development boundary on Church Lane. Otherwise, the existing development boundary reflects the main built-up area of the village. Other areas considered but were felt to have a detrimental impact on the surrounding countryside.

QUESTION 70: Do you agree with the proposed development boundary? If not, how would you wish to see it amended?

Hurst Green

Context

- 15.46. Hurst Green is centred around the junction of the A21 trunk road and the A265 and is one of the District's larger villages, with a population of well over a thousand. Today, the village still has a reasonable level of services and is classed as a 'local service village' within the adopted Core Strategy. Service provision has been improved in recent years via the provision of a new primary school building and a new shop/café.
- 15.47. The village is wholly within the High Weald AONB and set within the landscape of the Upper Rother Valley. There are a number of buildings listed for their special architectural or historic interest within the village, the majority of which are consolidated around the original core of the built form. More recent estates have developed on the northern side of the A265 and offer a mixture of house types. To the west of the village lies Burgh Hill, a ribbon form of development of mature dwellings which extends some way out of the village.

Development Provisions

- 15.48. The adopted Core Strategy identified a requirement for 75 dwellings in Hurst Green from new sites. Hurst Green did not have any allocations in the previous plan (2006 Local Plan) and has had relative few completions in the last few years, other than an exception site (10 units) at Dairy Close.
- 15.49. There is also some evidence of a need for a new facility for older children/teenagers in Hurst Green¹, although existing open spaces in the village appear to have capacity to accommodate this in the longer term if required.

Site Options

- 15.50. A number of sites have been considered (as seen on Figure 92 below) but there are environmental constraints on outward expansion. The northern side of the village is bounded by Burgh Wood, a large area of ancient woodland, and a Site of Nature Conservation Importance (SNCI). The broad valley of the River Rother is situated south west of the village and there are long distance views out of the village over the surrounding undulating countryside. Hurst Green Meadows and Woodlands is also an SNCI consisting of a collection of gently sloping meadows and pastures.

1 Rother District Councils 'Open Space, Sport and Recreation Study'

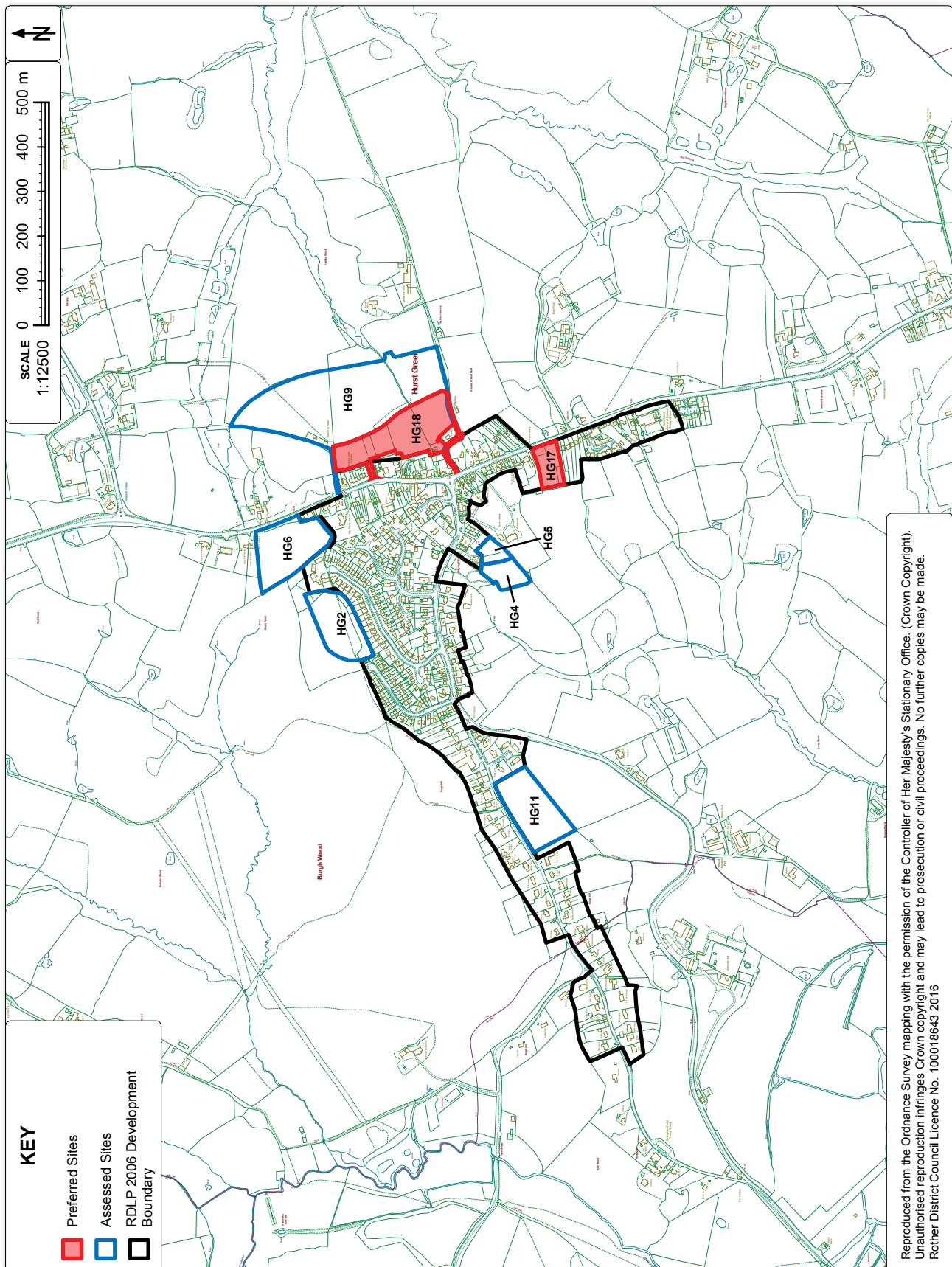
- 15.51. Several of the sites considered have access issues and/or are poorly related to the village core. A large area to the east of the village (HG18) is the main preferred site for development, since it has limited impact on the surrounding countryside, is accessible to key services and has an existing access road. A smaller site on the High Street (HG17), from which the existing occupier wishes to re-locate, is also a preferred site.

QUESTION 71: Do you agree with the preferred sites for development at Hurst Green? If not, which sites should be preferred?

Villages with site allocations

Hurst Green

Figure 92. Hurst Green Options Map



Preferred Site: Land off Foundry Close, Hurst Green (Ref: HG18)

Existing use(s)	Vacant scrub.
Size	2.4ha
Key constraints/opportunities	<p>The site is suitable for residential development, relating well to existing services. There is capacity for approximately 60 dwellings subject to provision of parking, retention of important trees, hedges, historic field boundary and ecological features (including ditches).</p> <p>The site is relatively well contained, although a strong wooded edge would be required to contain new development from the wider countryside, particularly along the east boundary which is a historic field boundary.</p> <p>There is an existing vehicle access via Foundry Close that meets with the approval of both Highways England and ESCC Highways Authority.</p> <p>Additional pedestrian linkages are required for this site to ensure permeability, including direct access via a pedestrian crossing to village services, the school and shops, including:</p> <ol style="list-style-type: none"> 1) a connection to the A21 and Station Road via the south west corner of the site (along existing footpath 31); 2) connections to Drewett Field to the south (also along existing footpath 31); 3) a connection north to footpath 33. <p>The severance barrier of the A21 is an issue. S106 contributions are required from the development towards mitigating transport impacts in accordance with Core Strategy Policies TR3 and IM2. This would include the connection described in bullet 1 above. Signalling works at the junction of the A265 and A21 may be desirable, pending further investigation with the Highways Authorities. Local concerns about prevailing traffic speeds may also be addressed by mobile speed enforcement, a safe location for the camera van to park and/or a traffic safety camera, the locations of which are decided by the 'Camera/Safety Partnership'.</p> <p>A 'Local Area for Play' would be desirable to incorporate within the development to cater for locally generated need.</p>

Key constraints/opportunities	<p>The stream/ditch that sub-divides the two lower fields is a key character feature and also a High Weald AONB 'historic field boundary'. It should be retained for both heritage and ecological purposes (in accordance with Core Strategy Policies EN5, EN1 and EN2). There is an existing farm access gate on the western end that can be utilised to provide through access between the two lower fields.</p> <p>Parking is a particular concern for the Parish Council. The development should provide an additional unallocated car parking area close to the Foundry Close access, sufficient to replace on-street parking that is lost as a result of traffic management measures on Foundry Close.</p>
Proposed use(s)	Residential.
Developable area	2.2ha
Capacity	Approximately 60.

Villages with site allocations

Hurst Green

Figure 93. HG18 Aerial Map

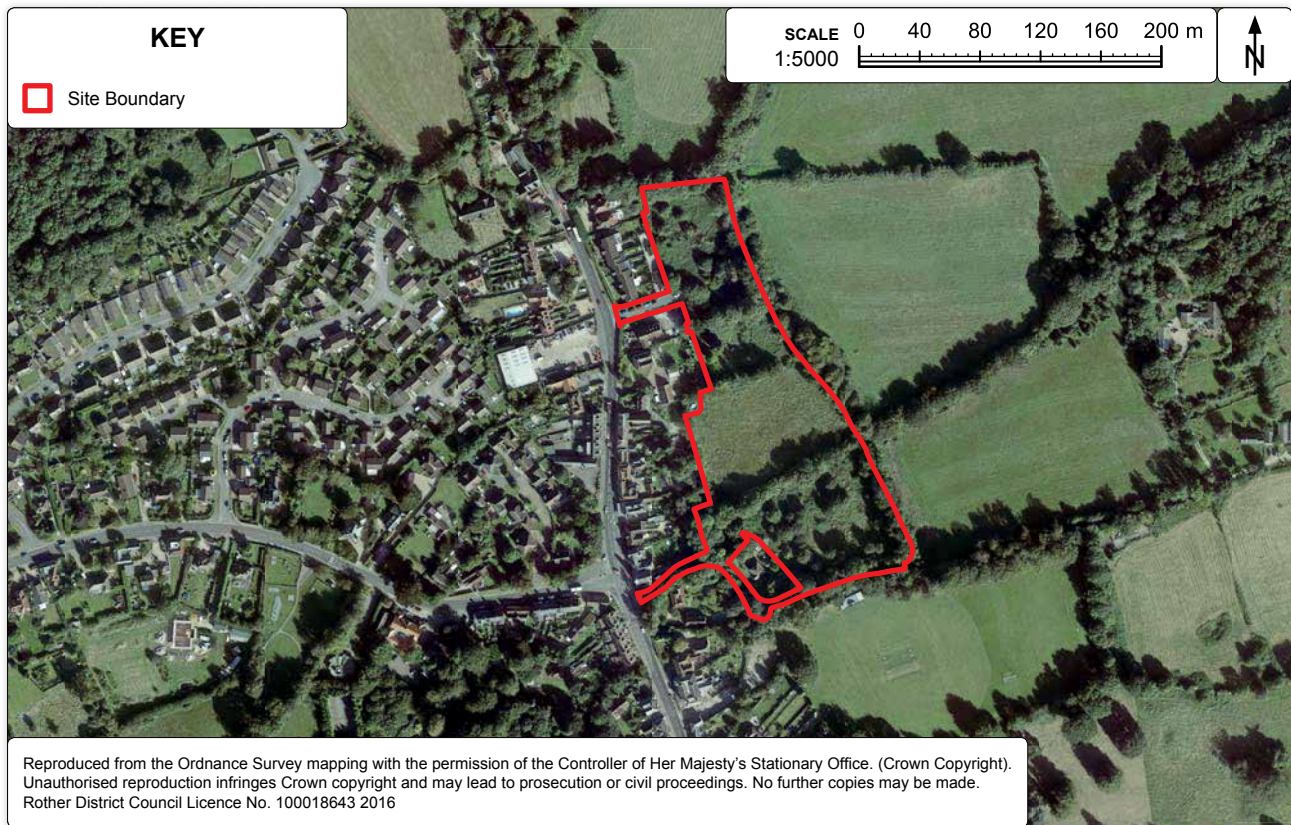
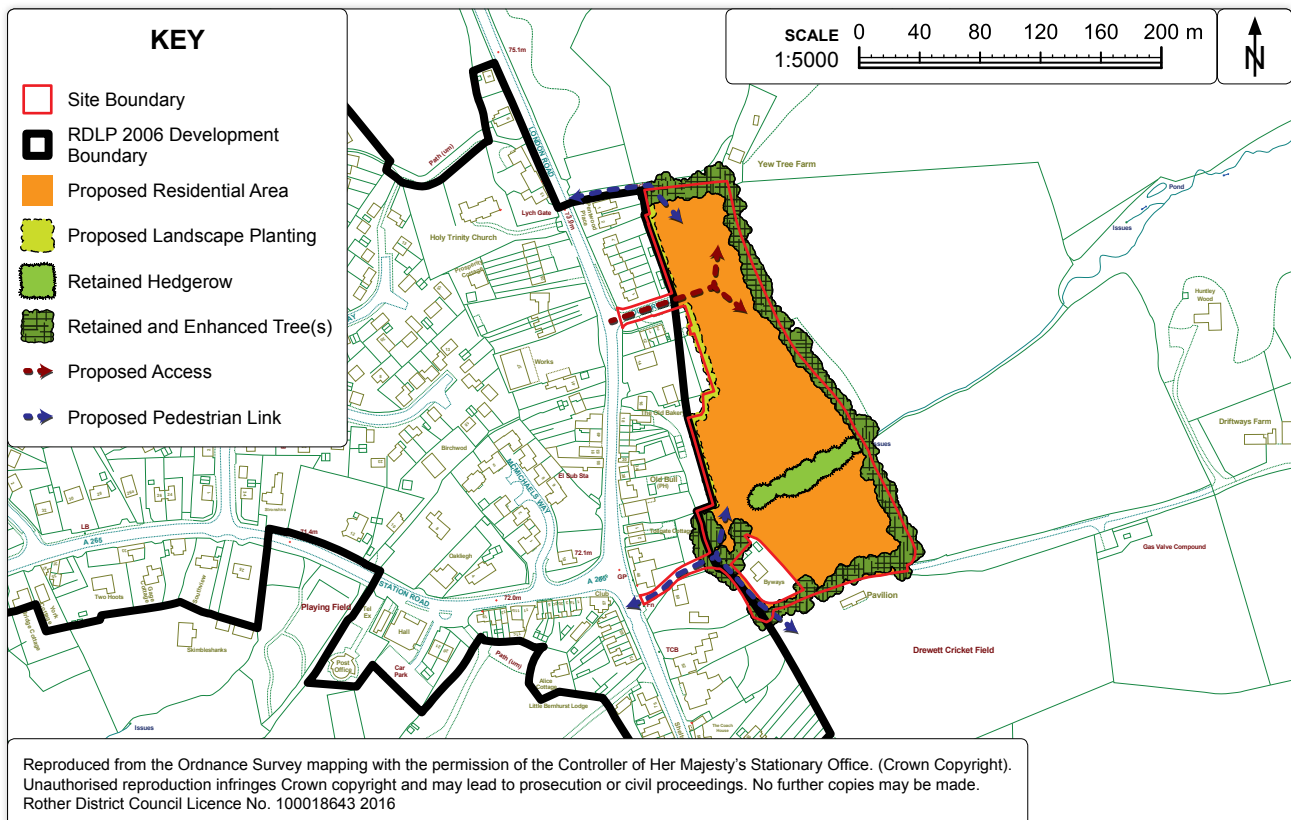


Figure 94. HG18 Detail Map



Policy HUR1: Land off Foundry Close, Hurst Green

Land to the east of Hurst Green is allocated for residential development. Proposals will be permitted where:

- (i) approximately 60 dwellings are provided, of which 40% are affordable;
- (ii) vehicular access is provided off Foundry Close;
- (iii) the development provides additional unallocated car parking spaces adjacent to the Foundry Close access, sufficient to replace on-street parking that is lost as a result of traffic management measures on Foundry Close;
- (iv) a 'Local Area for Play' is provided within the development;
- (v) a strong wooded edge screens new development from the wider countryside, particularly along the east boundary;
- (vi) direct pedestrian linkages are provided as follows;
 - (a) a connection to the A21 and Station Road via the south west corner of the site (along existing footpath 31);
 - (b) connections to the Public Open Space to the south (also along existing footpath 31); and
 - (c) a connection north to footpath 33.
- (vii) the stream/ditch historic field boundary that sub-divides the two lower fields is retained and incorporated within the layout; and
- (viii) developer's contributions are made towards highway safety improvements in the village, in order to make the development acceptable in planning terms.

QUESTION 72: Do you agree with the requirements of Policy HUR1? If not, how would you wish to see it amended?

Villages with site allocations

Hurst Green

Preferred Site: Caravan Tech, Hurst Green (Ref: HG17)

Existing use(s)	Caravan sales.
Size	0.5ha
Key constraints/opportunities	<p>This is an existing retail/commercial site within the development boundary. The occupier wishes to expand by re-locating to alternative premises, in which case the site offers a residential opportunity. Continued commercial operation potentially impacts on local amenities in a congested location where residential is the prevailing character.</p> <p>The site is well located for residential development to access local services, including the primary school, local shops/ services and village hall.</p> <p>The site is already reasonably well screened from the surrounding AONB countryside to the west by existing trees.</p> <p>Recent residential developments along this stretch of the A21 have not been restricted to frontage schemes. Therefore a 'courtyard' interior layout would not be out of keeping with prevailing character, although a frontage should also be maintained to the A21 for the benefit of the street-scene.</p> <p>However, layout would need to respect neighbouring amenities, particularly at the north-east boundary where buildings are at the site boundary.</p> <p>Access would necessarily be off the A21, although subject to further highways assessments there is no preference regarding specific access point at this stage.</p> <p>Since it is subject to relocation of the current occupier, development here could not be considered imminent. However, as the other proposed allocation is being actively pursued, growth of the village may reasonably be spread across the plan period.</p>
Proposed use(s)	Residential.
Developable area	0.5ha
Capacity	Approximately 15.

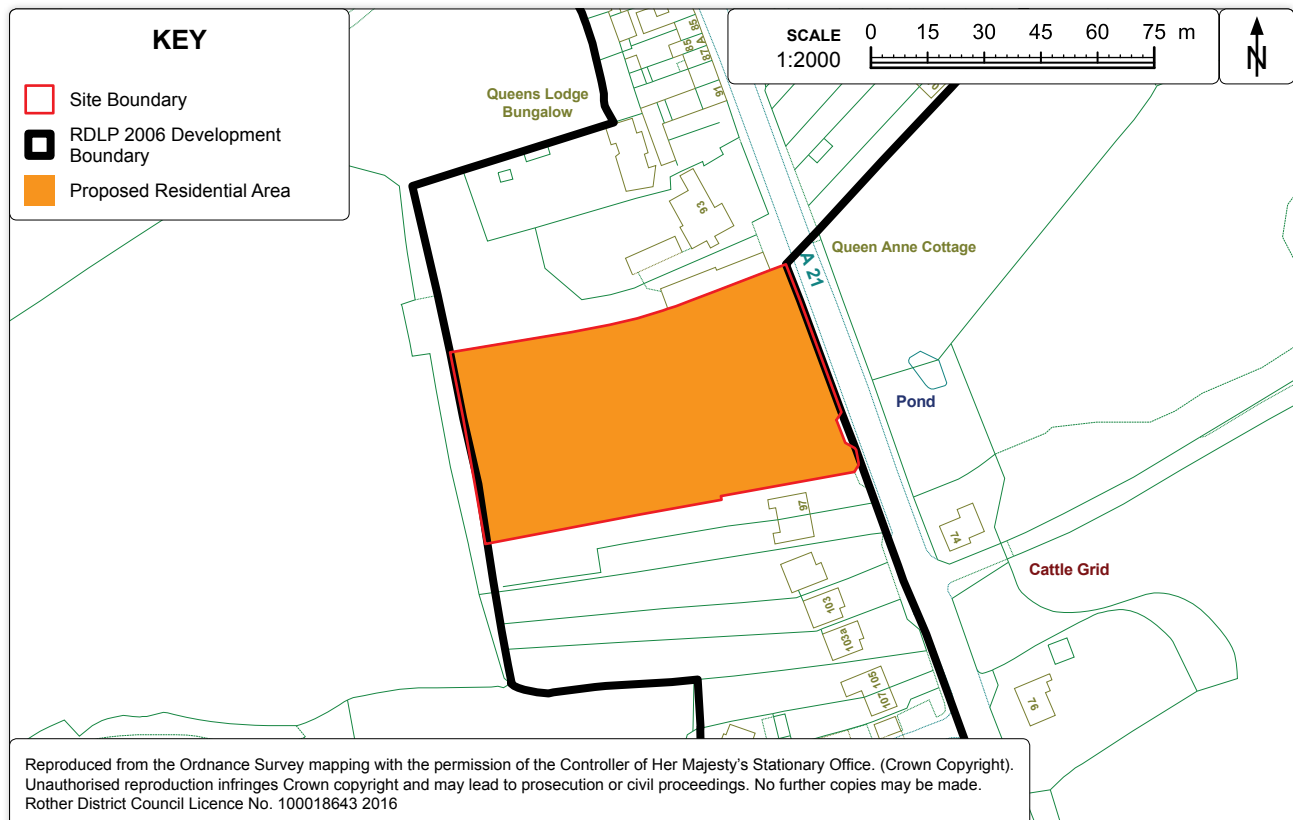
Villages with site allocations

Hurst Green

Figure 95. HG17 Aerial Map



Figure 96. HG17 Detail Map



Policy HUR2: Caravan Tech premises, High Street, Hurst Green

Land at the existing Caravan Tech premises, Hurst Green is allocated for residential development. Proposals will be permitted where:

- (i) approximately 15 dwellings are provided, of which 40% are affordable;
- (ii) vehicular access is provided off the A21;
- (iii) the scheme layout respects neighbouring amenities; and
- (iv) the scheme layout retains a frontage onto the A21.

QUESTION 73: Do you agree with the requirements of Policy HUR2? If not, how would you wish to see it amended?

Development Boundary

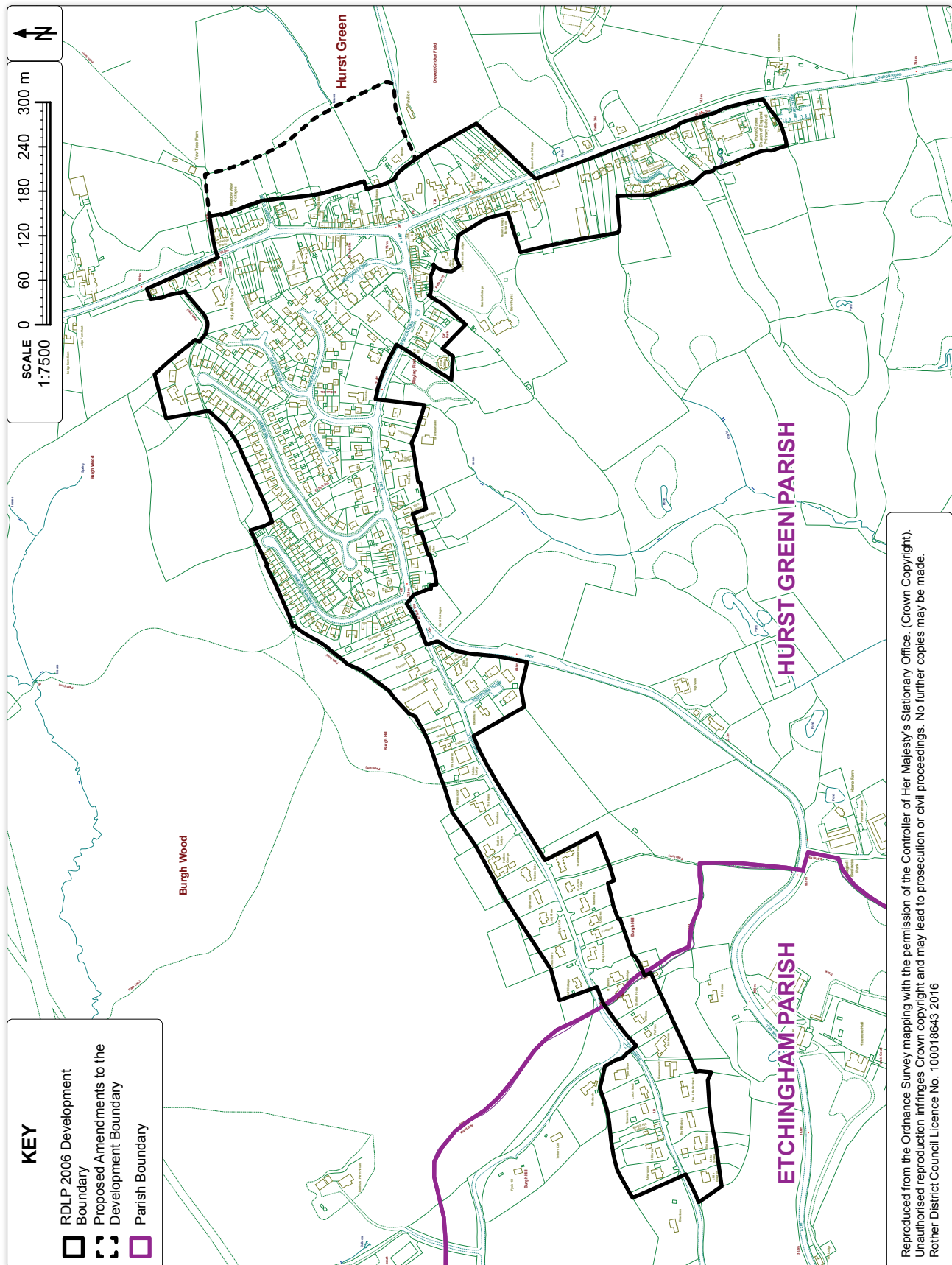
- 15.52. It is proposed to amend the development boundary to incorporate the allocation to the east of Hurst Green (HUR1), which is not currently within the development boundary. No other amendments are proposed.
- 15.53. The far western end of Burgh Hill, although within the Hurst Green development boundary and relating to Hurst Green village, is actually within Etchingham Parish. Therefore any review of the development boundary at this location will form part of the consideration of the Etchingham Neighbourhood Plan.

QUESTION 74: Do you agree with the proposed development boundary? If not, how would you like to see it amended?

Villages with site allocations

Hurst Green

Figure 97. Hurst Green Development Boundary Map



Iden

Context

- 15.54. Iden is a small village located near the East Sussex Kent border which is situated two miles north of Rye; Peasmarsh, the local service village, is located approximately two miles to the west of Iden. It overlooks the marshes with the Royal Military canal to the east. The village has a long history dating back to the Domesday book. The village straddles the B2082 while the historic core of the village has grown around the crossroad in the centre of the village. Latterly, more modern development has grown along the roads leading out of the village: Wittersham Road, Grove Lane, Church Lane and along Main Street.

Development Provisions

- 15.55. Given the scale of the village, its setting and limited opportunities for any further development, the Local Plan Core Strategy only identifies a modest target for new housing over the Plan Period to 2028 of some 12 dwellings. No new sites has come forward recently, hence this remains the target.

Site Options

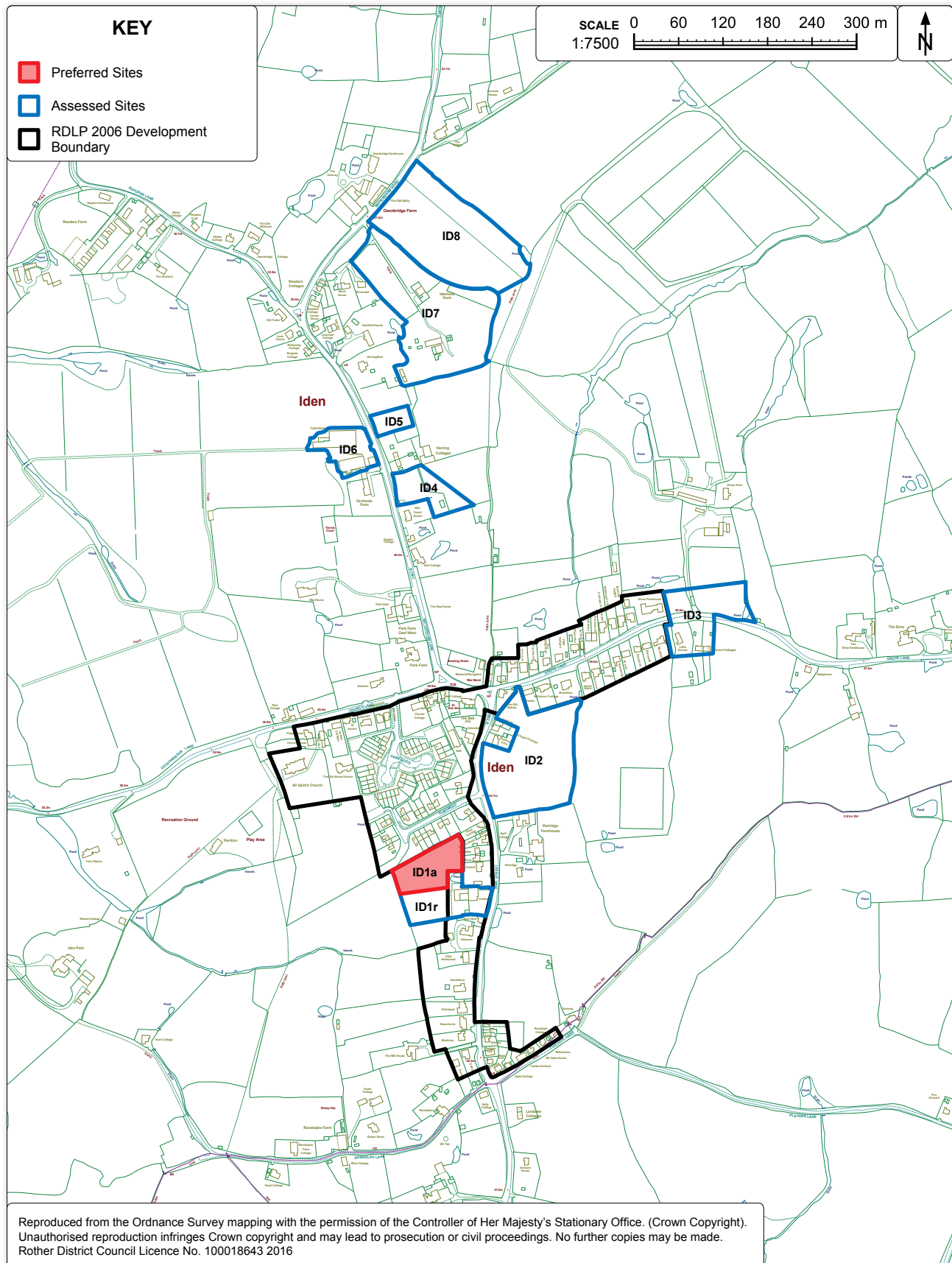
- 15.56. Eight sites in and around Iden have been considered in terms of their potential for housing sites. Three abut the existing development boundary and the remaining five sites are located to the north of the village along Wittersham Road. The five sites located to the north of the village range from agricultural holdings, paddocks and enclosed gardens and are considered detached from the main body of the village and relatively unsustainable. Development there would apply unwanted development pressure along Wittersham Road. Furthermore, it is considered that some of those sites not enclosed by strong boundaries had a negative impact on the wider AONB historic landscape, with medium to long views into a number of the sites.
- 15.57. Of the three sites abutting the existing settlement boundary of Iden, land south of Elmsmead (Ref. ID1a) is found to have the most potential. The other two sites under consideration were discounted on the grounds of impact on the wider medieval AONB landscape, inadequate access, loss of equestrian facilities and impact on the setting of the listed buildings. Further details of the assessment of individual sites can be found in Appendix 3.

QUESTION 75: Do you agree with the preferred site for development at Iden? If not, which site(s) should be preferred?

Villages with site allocations

Iden

Figure 98. Iden Options Map



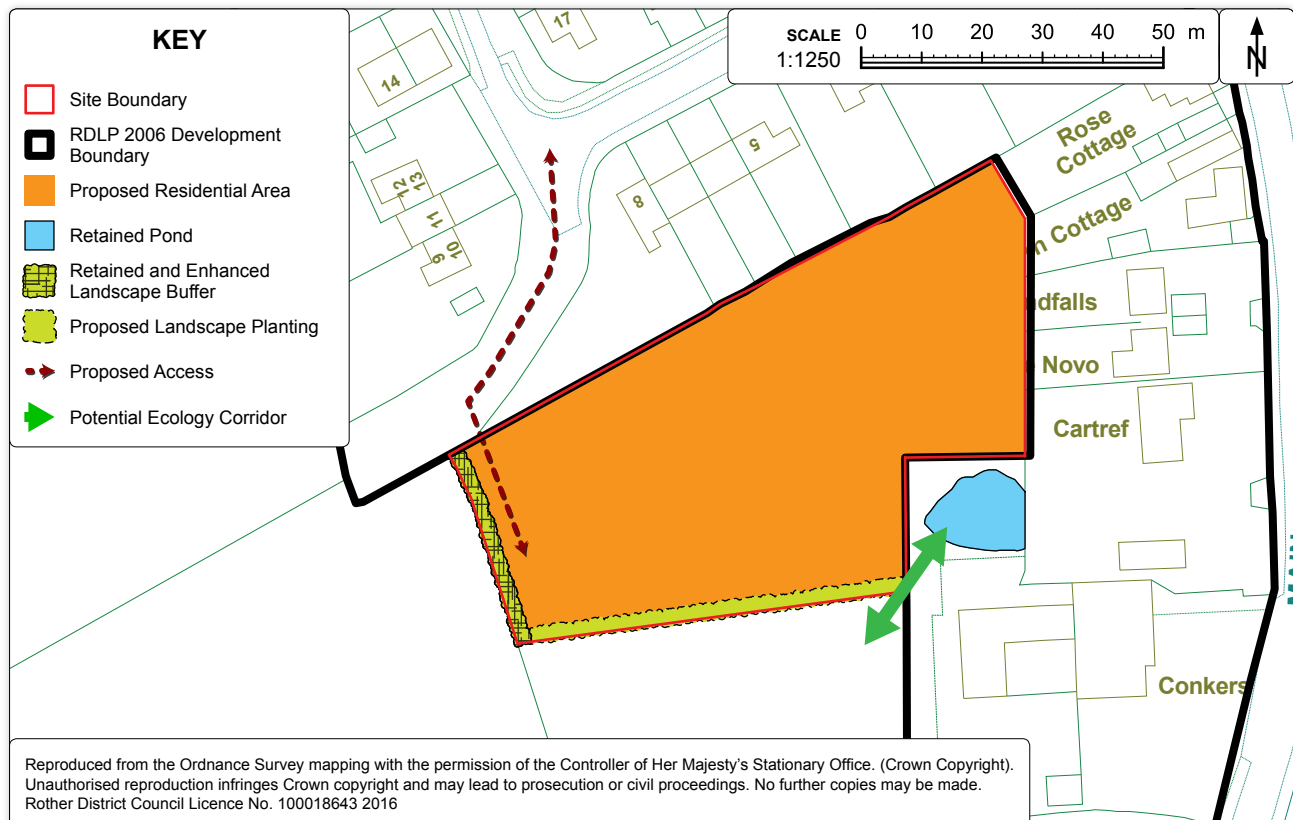
Preferred Site: Land south of Elmsmead (Ref: ID1a)

Existing use(s)	Residential Paddock.
Size	0.94ha
Key constraints/opportunities	<p>The site is relatively enclosed in the built form of the village and is also well placed to access local amenities. The site is located on the western side of Main Street. The site lies to the rear of an existing residence known as 'Conkers' but was converted from a former public house. Conkers and East View to the immediate south of the site are both Grade II listed status.</p> <p>Views from Main Street through the site into the wider AONB landscape to the west are retained also safeguarding the setting of the both Conkers and East View.</p> <p>Access would be delivered off Elmsmead to the north of the site via third party land, to which there is an 'in principle' agreement.</p> <p>A pond is located on the eastern boundary of the site. Ponds are valuable in terms of the character of the High Weald AONB as well as potentially supporting many species including protected ones. It will be expected the applicant will undertake a detailed ecology appraisal to evaluate any significant species present in and around the pond and provide an appropriate link to the undeveloped paddock located to the south.</p> <p>Care should be taken to respect the amenity value and setting of adjoining properties on the northern and eastern boundary of the site.</p>
Proposed use(s)	Housing.
Developable area	0.43ha
Capacity	Some 12 dwellings.

Figure 99. ID1a Aerial Map



Figure 100. ID1a Detail Map



Policy IDE1: Land south of Elmsmead, Iden

Land south of Elmsmead, Iden (Ref: ID1a) on the west side of Iden, as shown on the Policies Map, is allocated for housing. Proposals will be permitted where:

- (i) some 12 dwellings are provided within the identified residential area as shown on the Policies Map, of which 40% are affordable;
- (ii) a new access is achieved off Elmsmead;
- (iii) the existing landscaped boundaries around the site is maintained and reinforced; and
- (iv) the pond on the eastern boundary is retained, with an ecology assessment undertaken and any impact on protected species mitigated.

QUESTION 76: Do you agree with the requirements of Policy IDE1? If not, how would you wish to see it amended?

Development Boundary

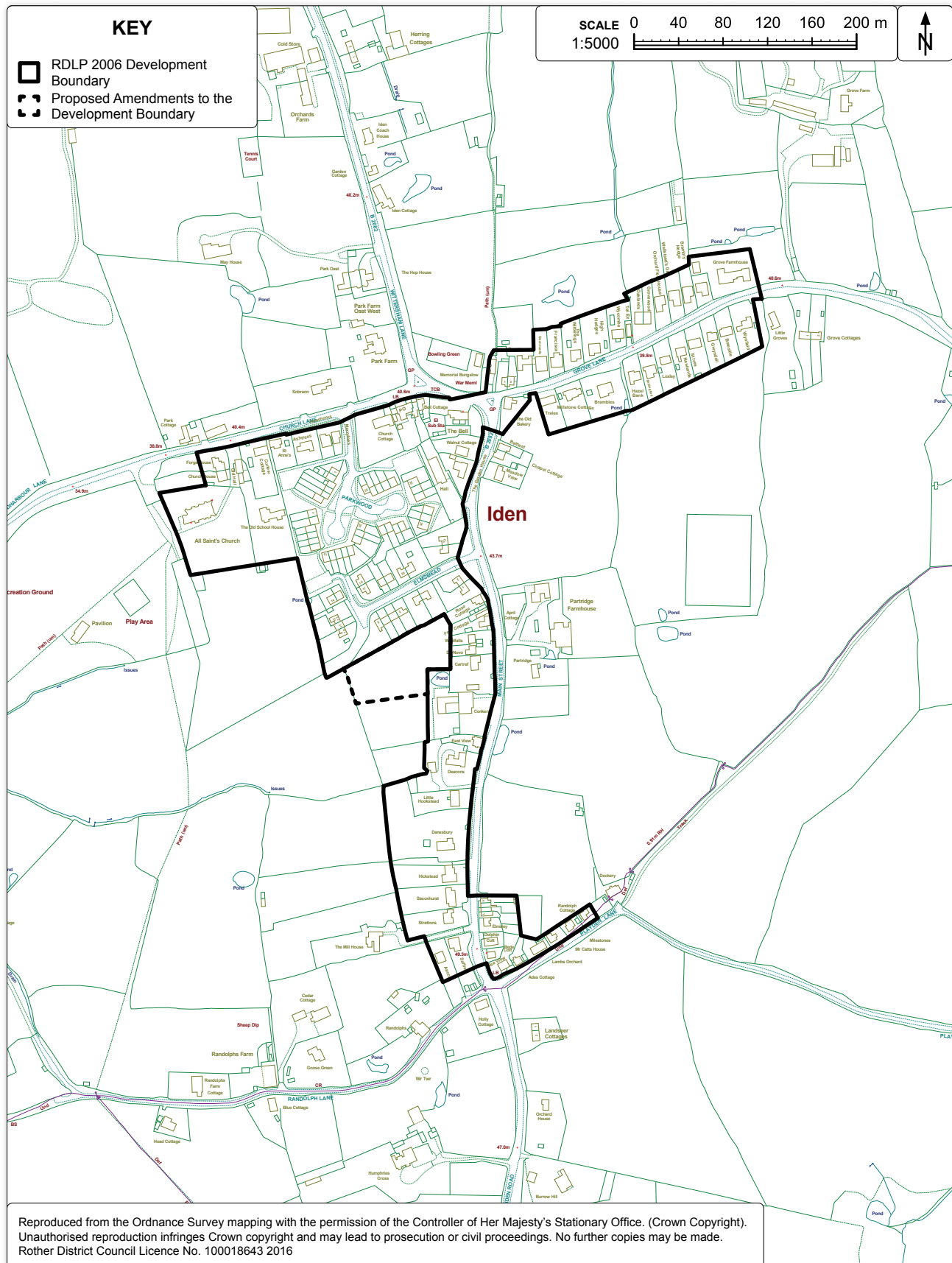
- 15.58. The purpose of development boundaries is set out in Chapter 11.
- 15.59. It is proposed to amend the development boundary as set out on Figure 101 below.
- 15.60. The proposed amendment to the development boundary will reflect the new allocation in the village.

QUESTION 77: Do you agree with the proposed development boundary? If not, how would you like to see it amended?

Villages with site allocations

Iden

Figure 101. Iden Development Boundary Map



Northiam

Context

- 15.61. Northiam is one of the larger villages in the District and supports a wide range of services and facilities. In the adopted Core Strategy, Northiam is identified as Local Service Village. The village lies along a generally north to south running ridge, and is located approximately 12 miles north of Hastings and about eight miles south of Tenterden. The smaller villages of Beckley Four Oaks and Peasmarsh are both within a 5 to 10 minute drive time to the east.
- 15.62. The original form of the village mainly consisted of ribbon development along the A28 and the minor roads that connect to it. More recently, a number of small residential estates have grown up to the rear of the established frontages. There are a substantial number of buildings listed for their architectural or historic interest in the southern/central part of the village and this more historic area has been designated a Conservation Area. Notable buildings in the area include the 17th century Grade I Brickwall House and the Grade I Listed timber-framed Great Dixter dating from 1450.
- 15.63. Undulating countryside surrounds Northiam and there are a number of areas of ancient woodland. To the north lies the Lower Rother Valley that dominates the eastern end of the High Weald AONB. There is a small Site of Special Scientific Interest between Harlot's Wood and Ghyll Side Road. North west, there are also distant views out of the settlement in the proximity of Great Dixter. To the east, there are open fields and ghyll woodlands that are integral to the rural landscape. Given the location of the village within the High Weald AONB, allied with the many outstanding views out of and into the settlement, any growth needs to be considered sensitively.

Development Provisions

- 15.64. The Core Strategy identifies 142 total new dwellings for Northiam between 2011 and 2028, of which 123 were from larger (6+ dwellings) sites. There has already been a subsequent permission at Donsmead, Station Road for 65 dwellings (RR/2015/545), reducing the target for larger sites to 58 dwellings.
- 15.65. While it would appear that this number of homes coincides with that for which permission also exists at Goddens Gill (RR/2013/1490/P), the developers advise that it is no longer viable and it is to put back to the market. A similar scheme is unlikely to be implemented as it was specialised with a limited market. However, it remains that this site is appropriate for housing for the elderly. Reference is made to an earlier sheltered housing scheme of 52 dwellings (RR/2010/1634/P - 9/9/10), which is regarded as a more realistic expectation on the site. Taking this into account, the remaining housing target is for 6 more dwellings.

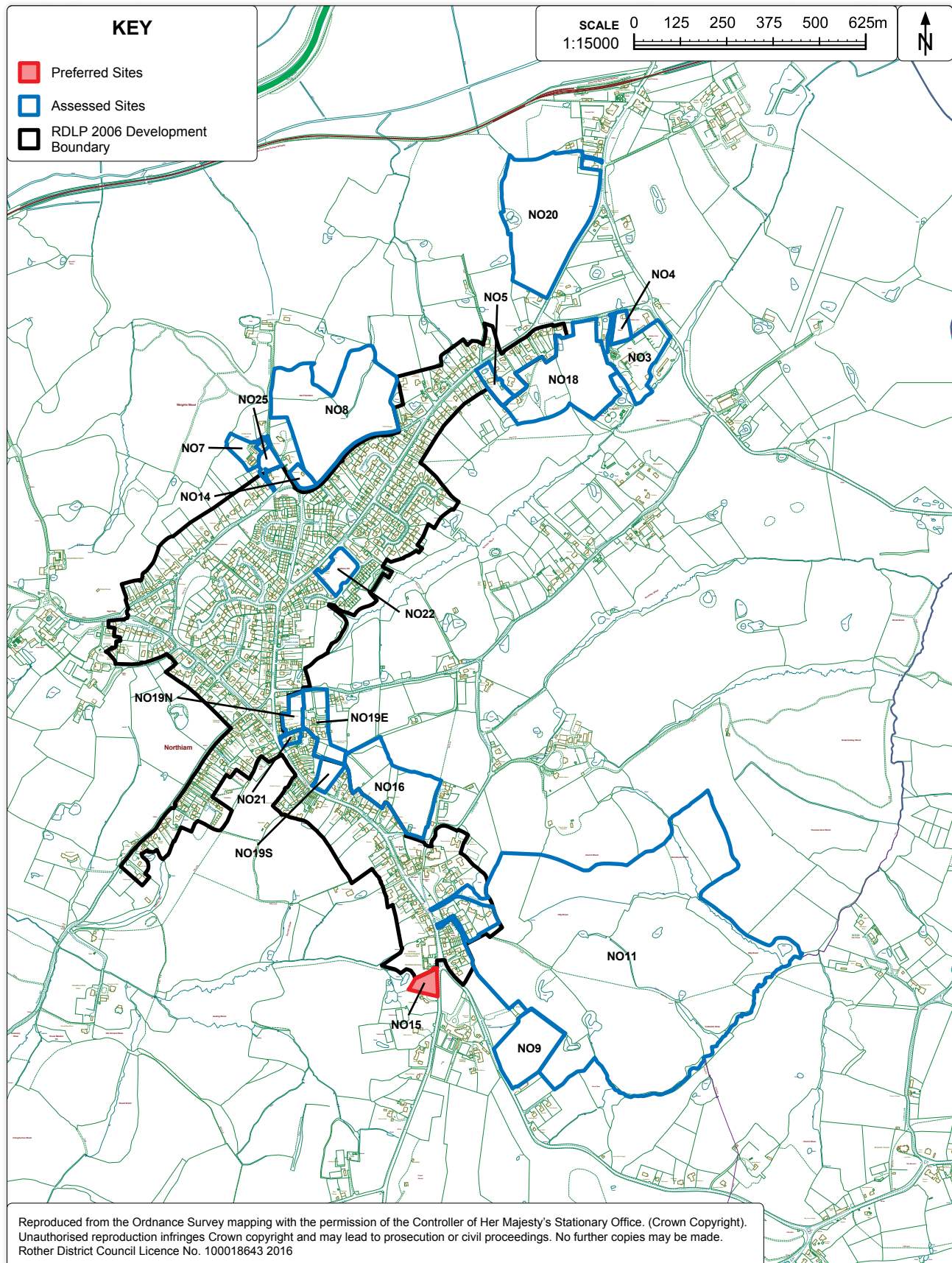
Site Options

- 15.66. There are over 20 sites of varying sizes in and around Northiam that have been assessed for their suitability as housing sites – see Figure 102: ‘Options Map’ below.
- 15.67. The majority of the sites offered for consideration are located on the eastern and north eastern fringe of Northiam and to the north of Dexter Lane. While development on the upper open slopes of the Lower Rother Valley should be robustly resisted, there are opportunities in enclosed pockets which are further assessed. Sites located centrally and to the east of the village are considered to be inappropriate because of access constraints, impact on the Conservation Area and the wider impact on the AONB landscape. Further details of individual sites can be found in Appendix 3.
- 15.68. Land south of Northiam Church of England Primary School (Ref: NO15) is the preferred site to accommodate the outstanding requirement of 6 dwellings for Northiam. It is an enclosed site and within walking distance of many of the village’s amenities. The tree belt on the frontage should be retained as far as possible, preserving the setting of the village as you approach from the south via the A28.

QUESTION 78: Do you agree with the preferred site for development at Northiam? If not, which site should be preferred?

Villages with site allocations Northiam

Figure 102. Northiam Options Map



**Preferred Site: Land south of Northiam Church of England Primary School
(Ref: NO15)**

Existing use(s)	Open meadow.
Size	0.36ha
Key constraints/opportunities	<p>The site has a frontage to the A28 on the southern fringe of the village and abuts the settlement boundary.</p> <p>The frontage of the site is characterised by a tree belt with 3 notable Oak specimens with all three benefiting from TPO status. This should be retained as it contributes to the setting of the rural approach to this part of the village. Similarly, there are two Oak trees to the rear of the site which also benefit from protected status, which should also be retained.</p> <p>A suitable buffer zone would be required to protect the tree roots of all protected trees within the site. Any site layout should be informed by a comprehensive tree survey and should avoid undue overshadowing from the trees.</p> <p>A new single access point onto the A28 at the northern end of the eastern boundary will serve some 6 units. Given its close proximity to the school to the north and nearby junction there is a requirement to undertake a satisfactory safety audit and to ensure suitable sight lines are achieved.</p>
Proposed use(s)	Housing.
Developable area	0.36ha
Capacity	Some 6 dwellings.

Villages with site allocations

Northiam

Figure 103. NO15 Aerial Map

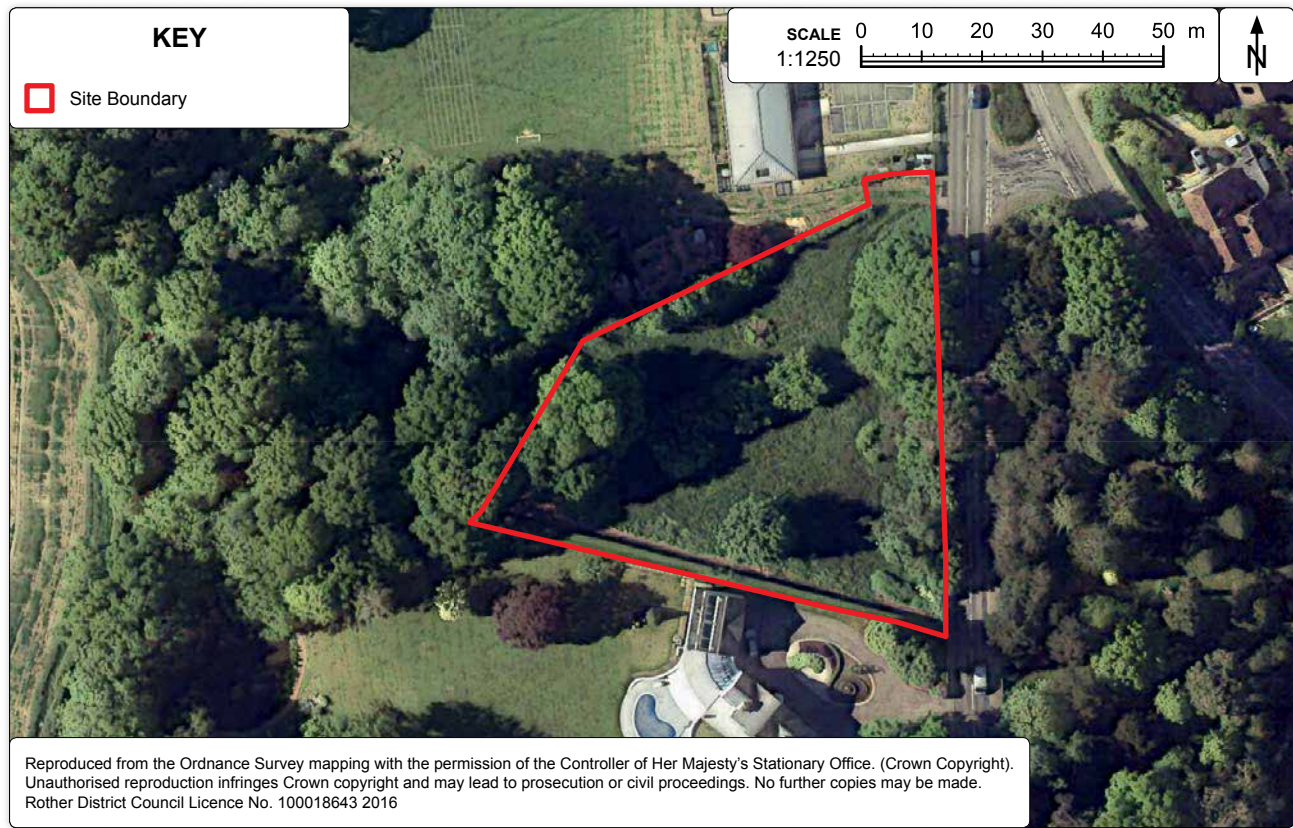
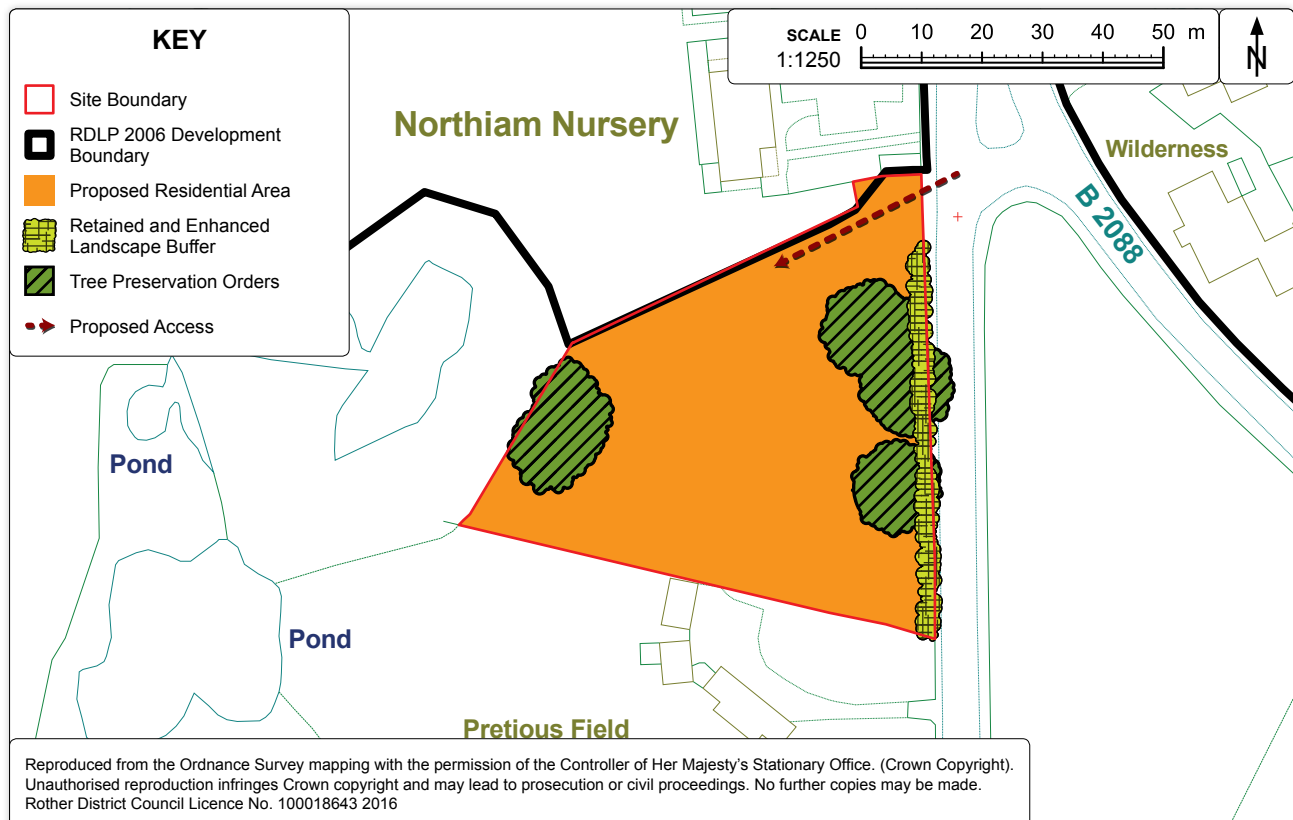


Figure 104. NO15 Detail Map



Policy NOR1: Land south of Northiam Church of England Primary School

Land south of Northiam Church of England Primary School (Ref: NO15), as shown on the Policies Map, is allocated for housing. Proposals will be permitted where:

- (i) some 6 dwellings are provide within the identified residential area;
- (ii) access is provided at the northern end of the eastern boundary of the site fronting onto the A28;
- (iii) financial contributions are sought for affordable housing in lieu of onsite provision; and
- (iv) existing trees on the eastern boundary and western boundaries, protected by Tree Preservation Orders, should be retained.

QUESTION 79: Do you agree with the requirements of Policy NOR1? If not, how would you wish to see it amended?

Development Boundary

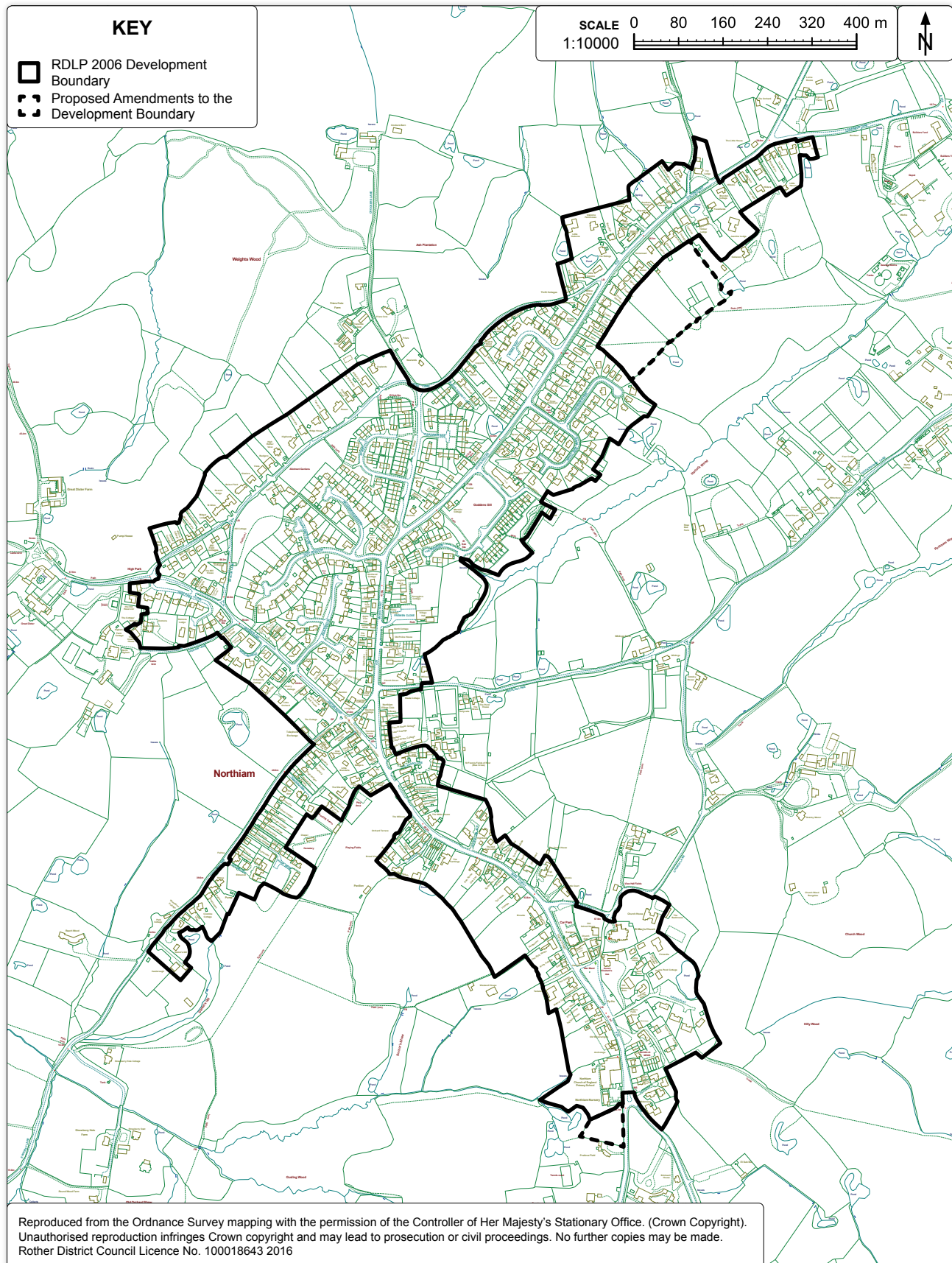
- 15.69. The purpose of development boundaries is set out in Chapter 11.
- 15.70. It is proposed to amend the development boundary as set out on Figure 105 below.
- 15.71. The proposed amendment to the development boundary will reflect the new allocation in the village, together with the recent permission for 66 dwellings (net 65) at Donsmead, Station Road.

QUESTION 80: Do you agree with the proposed development boundary? If not, how would you like to see it amended?

Villages with site allocations

Northiam

Figure 105. Northiam Development Boundary Map



Peasmarsh

Context

- 15.72. Peasmarsh is situated on the A268 four miles north-west of Rye, with a number of other small villages and hamlets located within close proximity, including Beckley Four Oaks, Iden and Playden. The immediate surrounding High Weald AONB 'Lower Rother Valley' landscape is gently undulating with large swathes of ancient woodland and a legacy of traditional orchards.
- 15.73. Although its ancient origins were centred upon the church to the south, the current village developed in a linear form, with dwellings abutting the A268 that runs through the centre and School Lane that branches from it. More recent estate developments have grown up to the north and south of the main road.
- 15.74. Today, the village has a population of just over one thousand. It has a good range of local services and, uniquely amongst Rother villages it hosts a supermarket which is on the west side of the village. Whilst Peasmarsh is classified in the Core Strategy as a 'local service village', it lacks a defined centre. The primary school is located to the south on School Lane, the village memorial hall to the north, while the recreation ground is situated on the north-east side of the village.
- 15.75. The village is flanked to both north and south by the Rother, Brede and Tillingham Woods Biodiversity Opportunity Area (BOA) which identifies opportunities for wetland habitat management, restoration and creation. The Lower Rother Valley Landscape Character Area Assessment includes landscape action priorities of conservation and restoration of coppice woodlands and traditional orchards, improvement of footpath access along the valleys, restoration of hedgerow and tree pattern in arable areas.

Development Provisions

- 15.76. The Local Plan Core Strategy identified a target for new housing of some 50 dwellings over the plan period up to 2028 (excluding small sites of 5 or less dwellings). The recent Maltings scheme has resulted in a windfall net gain of 10 which can be taken into consideration.
- 15.77. Background evidence shows a shortage of accessible public open space, with a new play area being a specific recommendation¹.

1 RDC Open Space, Sport & Recreation Study

Site Options

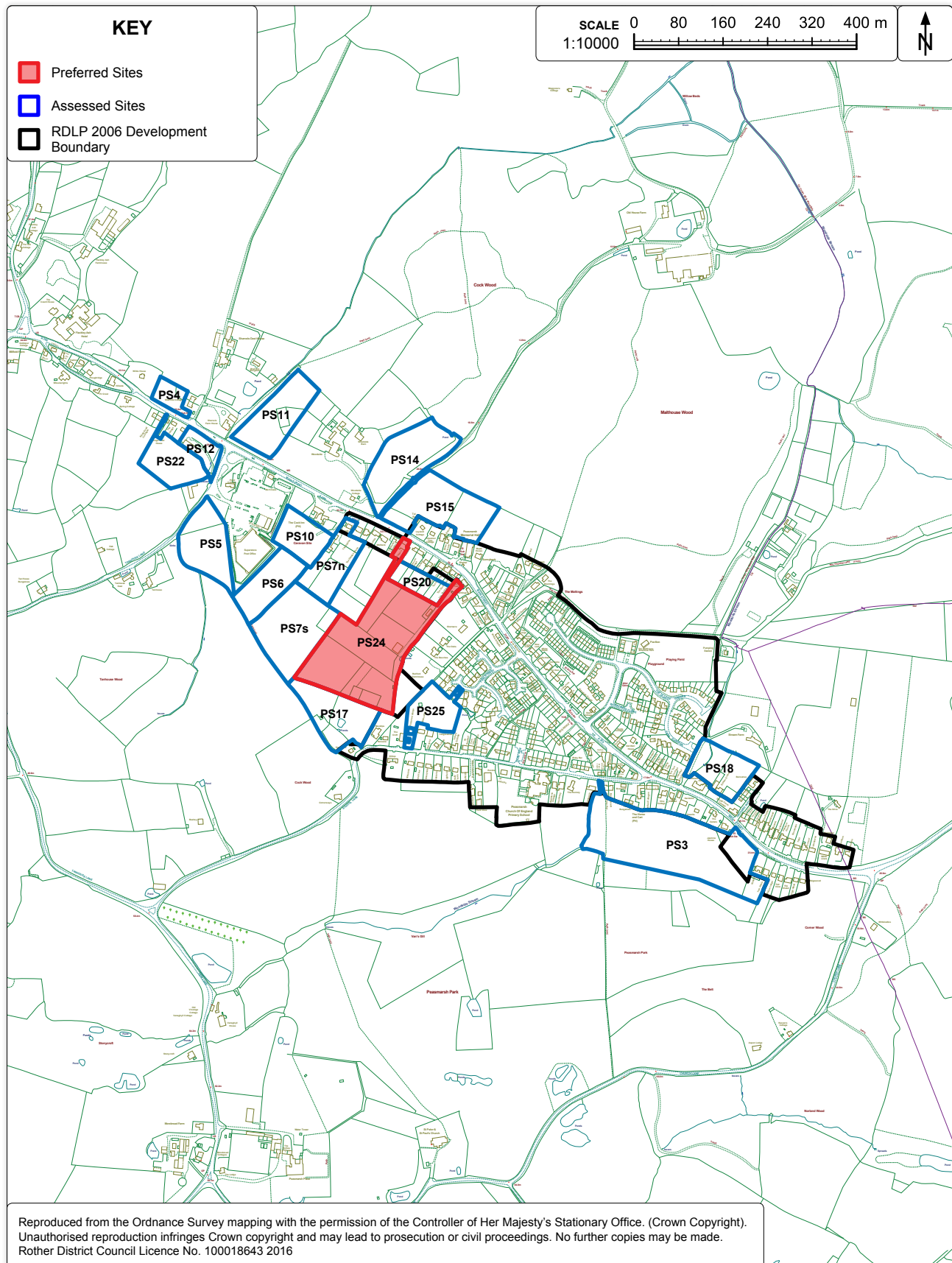
- 15.78. As shown on the Options Map below, a number of sites have been considered. The preferred option (Ref. PS24) is to locate development in the centre-west part of the village, an area that is relatively accessible to the dispersed services. The supermarket is about 400m to the west and the primary school about 700m to the south east. A bus stop and the village hall are about 100m away to the north.
- 15.79. Although the recreation ground and children's play are further afield at The Maltings, the site is of sufficient scale to accommodate play and open space alongside enough residential land to meet Peasmarsh's housing target. It has the additional advantages of being relatively free of wider landscape impact since it is enclosed from view, either by the contour of the landform or by surrounding woodland. Flood risk and biodiversity impacts are negligible.
- 15.80. In comparison, areas to the far west of the village are more visually exposed and typified by a close network of historic field boundaries typical of the High Weald AONB. Areas to the north, although enclosed from view, lack pedestrian accessibility, while areas to the east are further from key services and more exposed to the wider landscape.
- 15.81. The assessment of all sites is contained at Appendix 3.

QUESTION 81: Do you agree with the preferred site for development at Peasmarsh? If not, which site should be preferred?

Villages with site allocations

Peasmarch

Figure 106. Peasmarch Options Map



Preferred Site: Land south of Main Street (Ref: PS24)

Existing use(s)	Paddock/equestrian (non-commercial private use by landowners).
Size	3.2ha
Key constraints/opportunities	<p>The site provides a relatively accessible and sustainable opportunity for some 45 dwellings plus open space provision. In addition, this area has scope to increase pedestrian linkages and ensure the preservation of High Weald AONB character features.</p> <p>Northern sections of the site, adjacent to the existing development boundary lend themselves to residential provision, being particularly well screened from the wider High Weald AONB countryside.</p> <p>In terms of vehicular access, the Highways Authority has accepted it is achievable 'in principle' via 'Pippins', although this will require a priority solution for a short distance at the rear of the curtilage.</p> <p>Given the shortfall against open space standards, provision of an area of open space and children's play area is required. In addition, the main feature of the land to the south, a traditional orchard (which is both a Biodiversity Action Plan Priority Habitat and also a character feature of the High Weald AONB) no longer serves as its original function and is deteriorating in quality. The inclusion of this land within the open space will have a considerable benefit in terms of landscape character, ecology, village amenity and potentially as an educational resource (benefiting from a close proximity to the local primary school). Bringing the area back into active management (e.g. as a community orchard accessible to the public) would bring wider community benefits. However, in the absence of any such community management proposal emerging, the area can function as an accessible green space, with the orchard trees retained on-site (which are protected by TPO). This provision is also in accordance with the recommendations of the Lower Rother Valley Landscape Character Area Assessment. The open space/orchard will need to be separated from the residential area by provision of native species hedgerows.</p>

Key constraints/opportunities	<p>The site should prioritise permeability for pedestrians via connections to:</p> <ol style="list-style-type: none"> 1) Main Street to the north east of the site, via a green corridor connecting down an existing track that extends to the southerly rear sections of the site. 2) The footpath network off-site to the south and west, to connect the site to the wider area. This will require third party land for which there are at least two options. <p>Together, these connections will need to traverse the full length of the site. Regard should be given to realising ecological opportunities within the 'green corridor'.</p> <p>There is a gentle slope down towards eastern sections of the site to the proposed pedestrian through-route, where there is an existing pond. Surface water flow paths cross from the area proposed as orchard/open space and traverse the south east corner of the developable area. SuDS are likely to be required in these areas (subject to further advice of the Lead Local Flood Authority at application stage). There are opportunities here to create multi-functional SuDS alongside the pedestrian link in the form of a wetland habitat green corridor. This would be in accordance with the Rother, Brede and Tillingham Woods Biodiversity Opportunity Area (BOA) and the River Rother Catchment Flood Management Plan.</p> <p>The southern edges of the site are historic field boundaries that should be retained and enhanced. A large oak tree on the western side of the site should be incorporated within the layout. In addition, landscape planting would help screen the site from wider view at western edges.</p>
Proposed use(s)	Residential, children's play area, accessible natural green space/community orchard.
Developable area	Approximately 1.5ha
Capacity	45

Villages with site allocations

Peasmarsh

Figure 107. PS24 Aerial Map

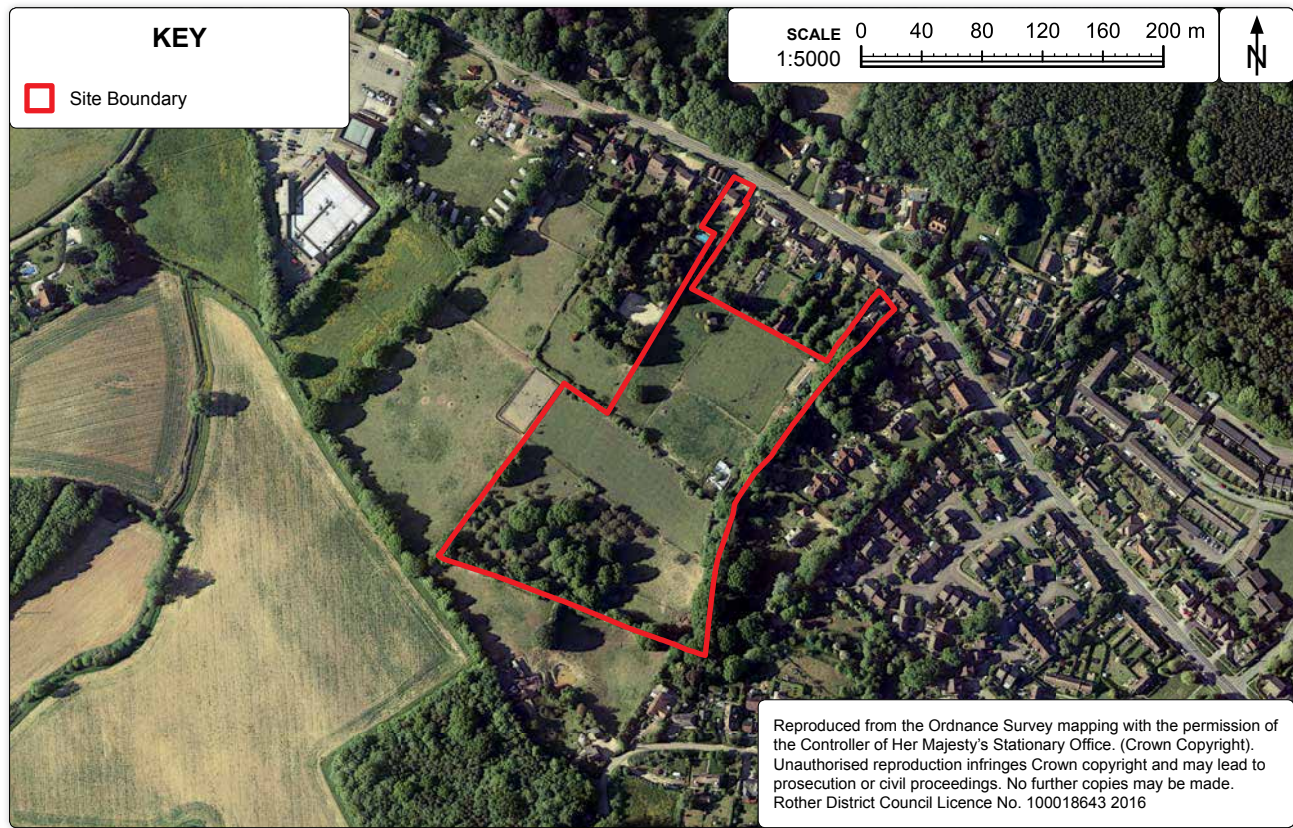
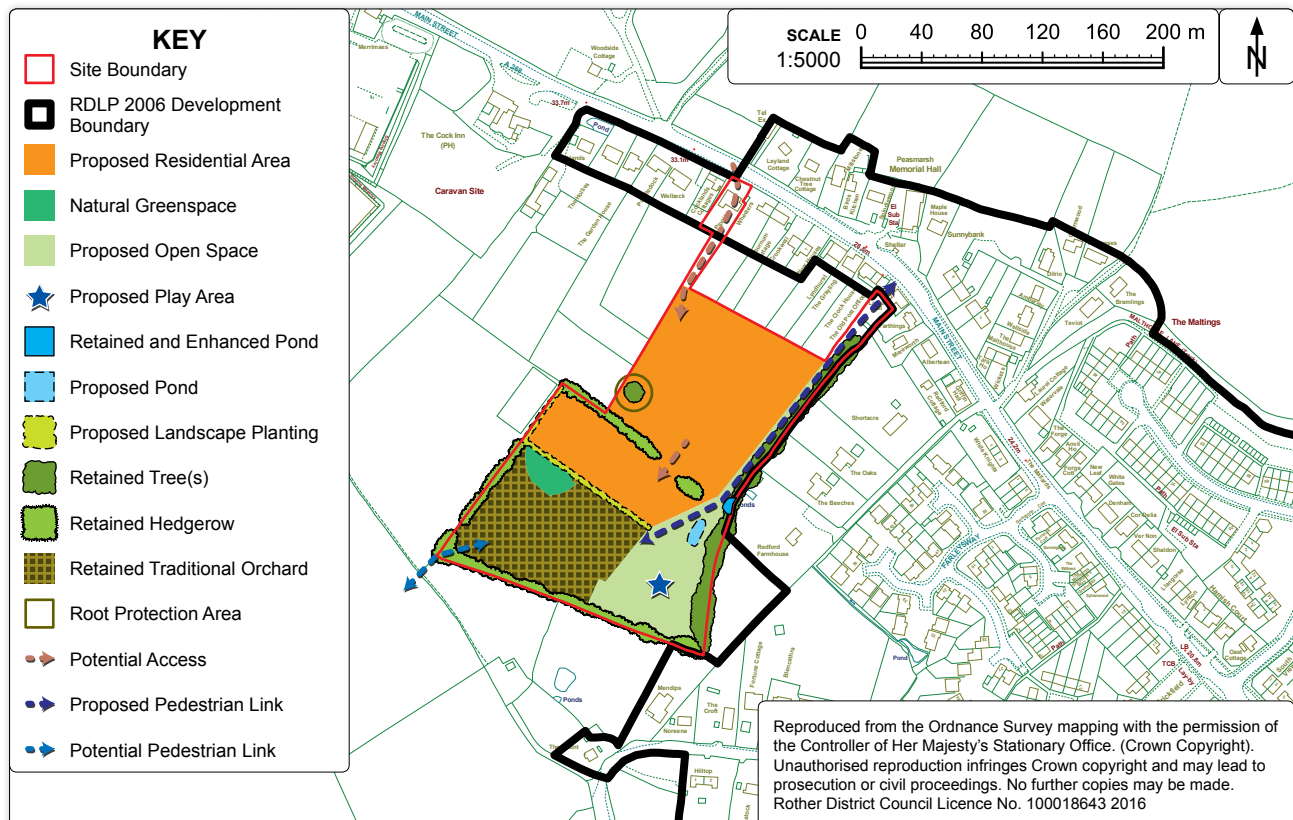


Figure 108. PS24 Detail Map



Policy PEA1: Land south of Main Street, Peasmarch

Land south of Main Street, Peasmarch, as shown on the Policies Map, is allocated for residential development and amenity open space in the form of a retained traditional orchard and children's play area. Proposals will be permitted where:

- (i) some 45 dwellings-are provided as shown on the Policies Map, of which 40% are affordable;
- (ii) vehicle access is to Main Street to the satisfaction of the Highways Authority;
- (iii) additional pedestrian/cycle access:
 - (a) to the north-east of the site, connecting down the length of the eastern boundary via a green corridor;
 - (b) southward connecting to the footpath network.
- (iv) provision of a children's play area, which should be subject to passive surveillance from residential frontages;
- (v) provision of open space to the south of the site, incorporating the traditional orchard within it, with funding arrangements for on-going management to maintain as open space and biodiversity interest;
- (vi) retention of other existing ecological and High Weald AONB character features so far as reasonably practicable, including historic field boundaries, boundary hedgerows, existing trees and existing pond; and
- (vii) maintenance and reinforcement existing landscaped boundaries around the site and creation of new ones on exposed western edges.

QUESTION 82: Do you agree with the requirements of Policy PEA1? If not, how would you wish to see it amended?

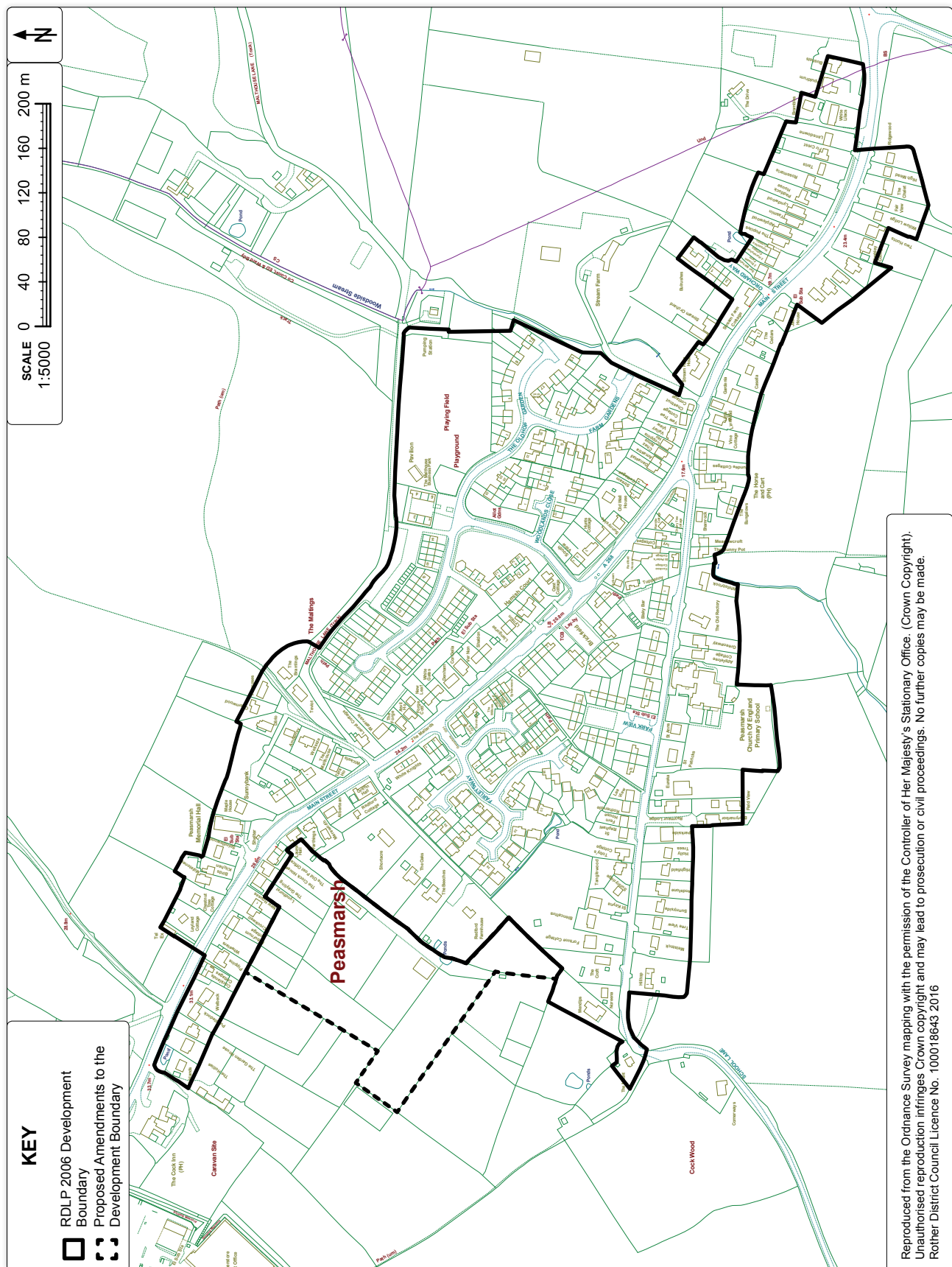
Development Boundary

- 15.82. The purpose of development boundaries is set out in Chapter 11.
- 15.83. It is proposed to amend the development boundary as set out on Figure 109 below.
- 15.84. The proposed amendment to the development boundary will reflect the new allocation in the village.

QUESTION 83: Do you agree with the proposed development boundary? If not, how would you like to see it amended?

Peasmarsh

Figure 109. Peasmarsh Development Boundary Map



Rye Harbour

Context

- 15.85. Rye Harbour is located near the mouth of the River Rother and approximately one and a half miles to the south east of Cinque Port town of Rye. It is part of the civil parish of Icklesham. Rye Harbour has close economic links with Rye, but is considered distinctly separate. Furthermore, this distinction is consolidated by the designation of a Strategic Gap between Rye and Rye Harbour.
- 15.86. Rye Harbour has a village hall, village shop, public house, sailing club, and RNLI lifeboat station. Frenchman's Beach Holiday Park is a large holiday caravan site located on the south east fringe of the village.
- 15.87. Access to Rye Harbour is solely along Harbour Road, a long straight road which bisects a large industrial area. There is also local bus service (services 313 and 342) which runs a limited hourly service between Rye and Rye Harbour. In recent years, access by walking and cycling has improved with the introduction of a shared walking and cycling route along Harbour Road.
- 15.88. The countryside surrounding Rye Harbour is subject to a number of International and national environmental designations, signifying its landscape character and nature conservation importance. The European complex known as the Dungeness, Romney Marsh and Rye Bay complex was formally designated a Special Protection Area (SPA) and Ramsar site on 30 March 2016. Adjacent to the village to the west, Rye Harbour Nature Reserve is also part of the International sites as well as designated a Site of Special Scientific Interest. It attracts many visitors each year.
- 15.89. The whole of Rye Harbour lies within Flood Zone 3a. The main flood risk to Rye Harbour is from the tidal River Rother. The completion of the Rother Tidal Walls West together with the Winchelsea flood protection scheme (new groyne fields and shingle recharge) has significantly increased protection of the village from tidal flooding. Nevertheless habitable rooms on the ground floor should be avoided and flood resistance and resilience construction methods should be implemented for all new dwellings at Rye Harbour.

Development Provisions

- 15.90. The Local Plan Core Strategy presents an overall strategy for Rye and Rye Harbour and sets an overall target of between 355-400 dwellings up to 2028 for Rye and Rye Harbour. The 2013 SHLAA identified a potential for 40 dwellings on new sites in the village up to 2028; hence, this is taken to be its target as a contribution to the overall housing requirement for Rye and Rye Harbour.

- 15.91. The Core Strategy promotes in Policy RY1 of the adopted Core Strategy that at least 10,000 sqm floorspace of employment at Rye and Rye Harbour. Employment at Harbour Road will be dealt with in this section of the DaSA and will be discussed later in paragraphs 15.99 - 15.103.
- 15.92. Employment provision specifically for Rye will be dealt with through the Rye Neighbourhood Plan. The Council will work with the Rye Neighbourhood Plan steering group to review Rye's employment need.

Site Options

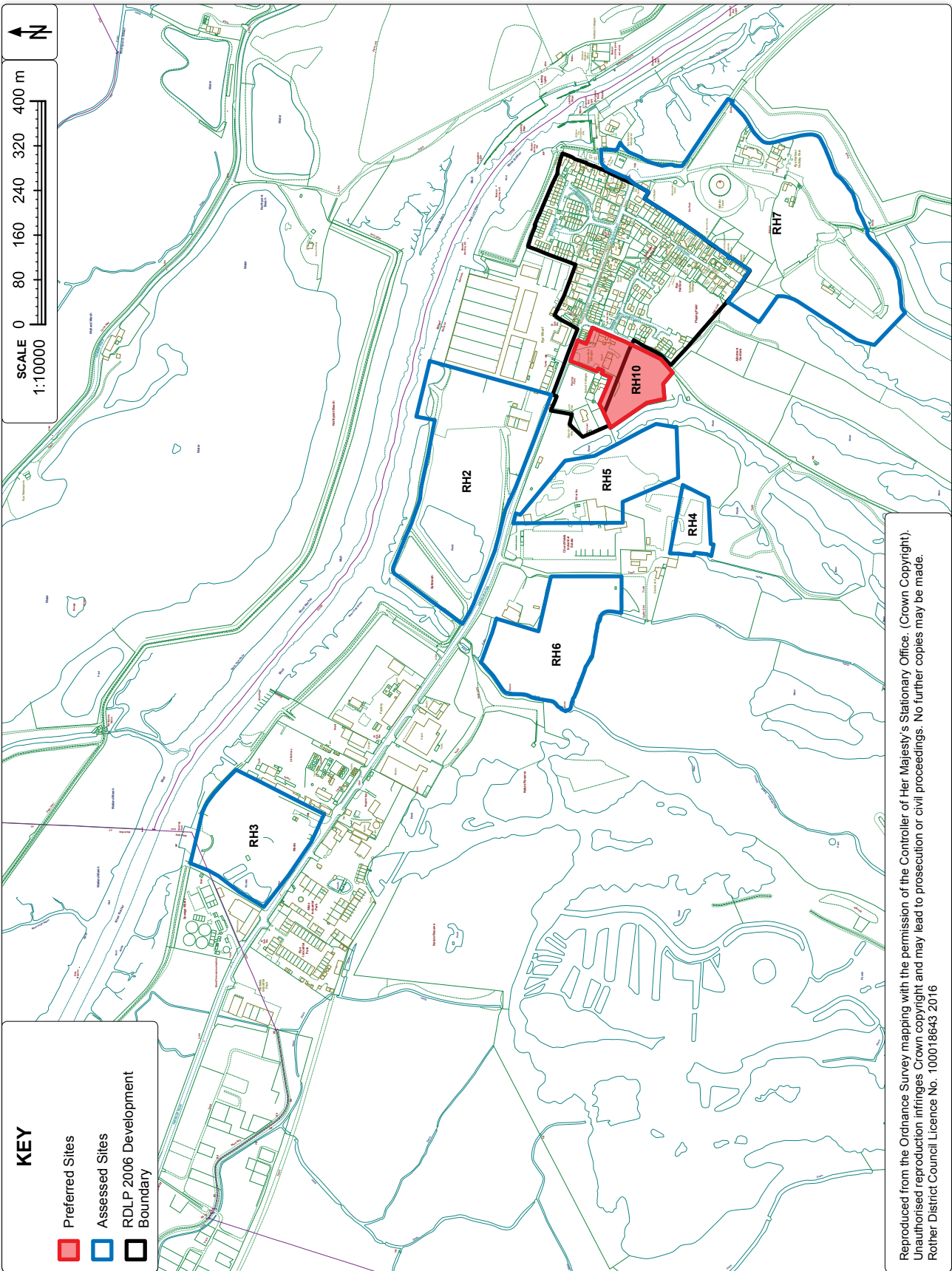
- 15.93. In total, there are 9 sites that have been considered as potential allocations - See 'Figure 110: Rye Harbour Options Map' below. The majority of sites are broadly located to the west of the village with only two abutting the existing settlement boundary. Greenfield sites were discounted because of flood risk. Two sites (Ref: RH4 and RH6) were not considered suitable as they lie in the SSSI designation. RH2, RH3 and RH5 were also rejected as potential housing sites as they are sited primarily in employment areas. For further details regarding individual sites please refer to Appendix 3.
- 15.94. Land at Stonework Cottages was previously designated in 2006 Local Plan for housing (for at least 16 dwellings within the existing settlement boundary. It is a brownfield site and is currently in low-key employment use for the storage of old motor vehicles. Land to the rear of this site is also brownfield was submitted for consideration but lies outside the settlement boundary. The two parcels of land coming forward together will improve viability and advance the probability of implementation in a challenging economic and environmental location.
- 15.95. Together, both areas form the preferred site to come forward comprehensively for some 40 dwellings (Site Ref: RH10).

QUESTION 84: Do you agree with the preferred site for development at Rye Harbour? If not, which site should be preferred?

Villages with site allocations

Rye Harbour

Figure 110. Rye Harbour Options Map



Preferred Site: Land at Stonework Cottages, Rye Harbour (Ref: RH10)

Existing use(s)	Low key employment land.
Size	1.65ha
Key constraints/opportunities	<p>RH10 comprises of two parcels of land should be bought forward as a comprehensive development. RH10 lies within Flood Zone 3a and habitable rooms should not be implemented on the ground floor. Dwellings should be flood resilient/resistant. Furthermore, essential infrastructure should be designed and constructed to remain operational and safe in times of flood.</p> <p>Given the commercial history of the site there may be contamination in the ground. The water table is particularly shallow beneath the surface of the site (within 1-2 metres) and could be leeching of contaminants from other areas of the estate. A proposal would have to undertake a land contamination assessment with the planning application that demonstrated any risks could be managed appropriately through the re-development process.</p> <p>Regard should be given to the setting of the Grade II listed School House and the Grade II Church of the Holy Spirits located west of the site.</p> <p>RH10 abuts the Rye Harbour SSSI on the southern boundary. Development would not adversely impact upon the Rye Harbour SSSI.</p>
Proposed use(s)	Housing.
Developable area	1.39ha
Capacity	Some 40 dwellings.

Villages with site allocations

Rye Harbour

Figure 111. RH10 Aerial Map

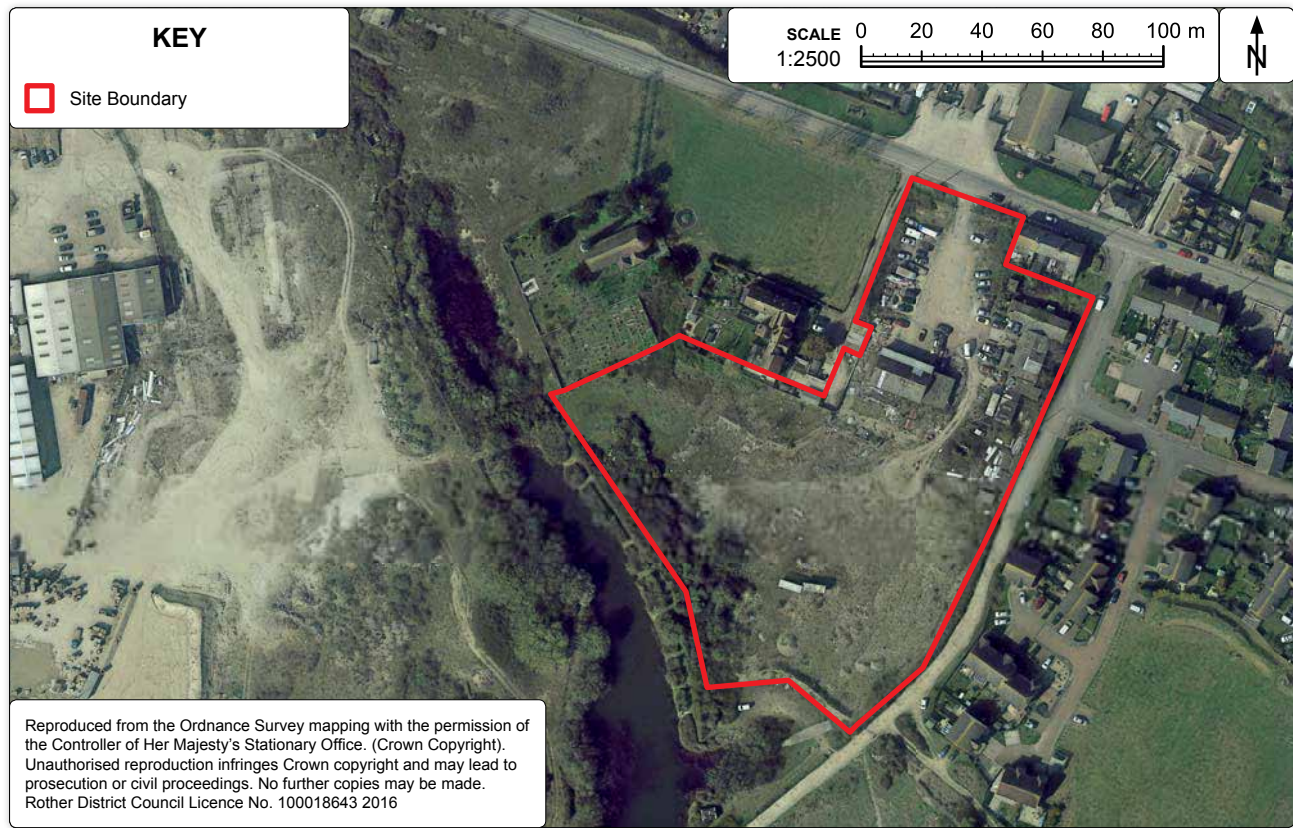
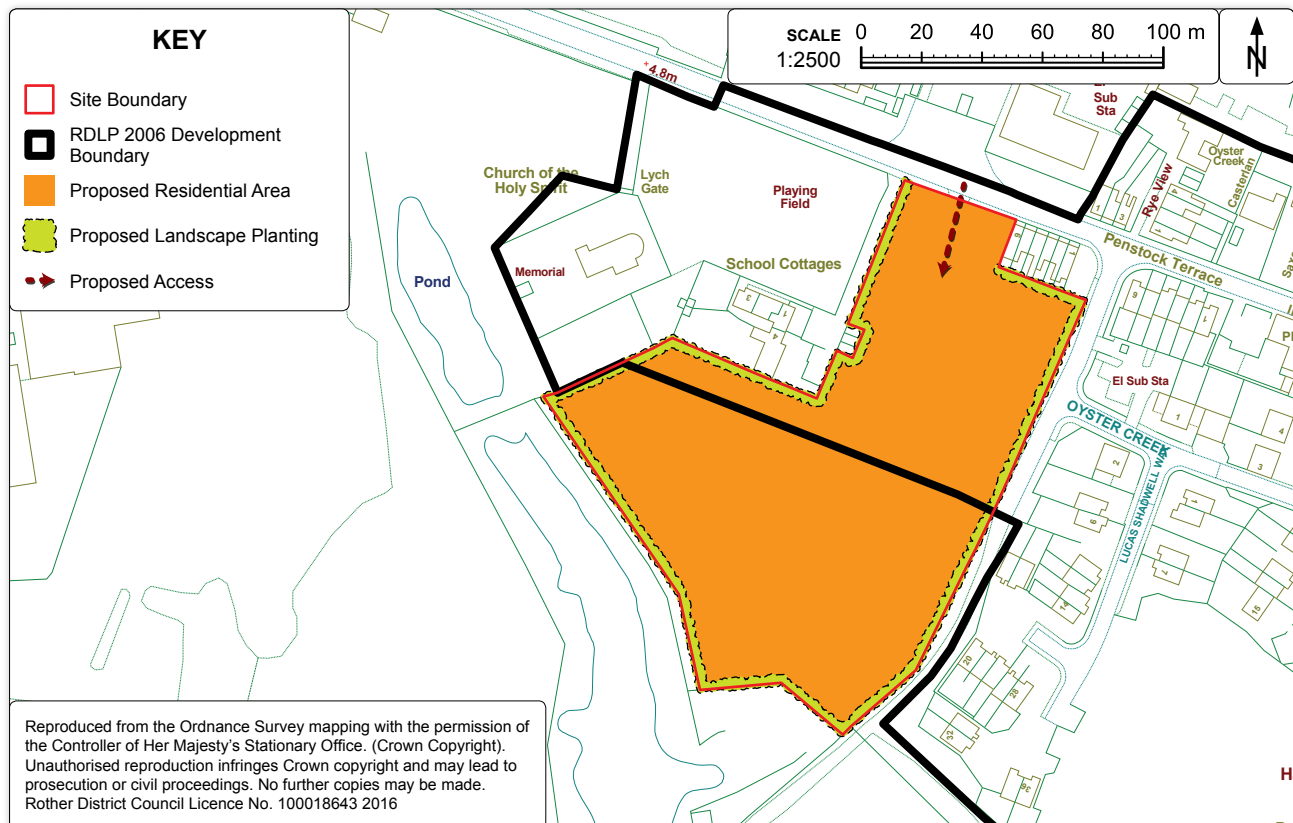


Figure 112. RH10 Detail Map



Policy RHA1: Land at the Stonework Cottages, Rye Harbour

Land at the Stonework Cottages, Rye Harbour (Ref: RH10) as shown on the Policies Map, is allocated for housing. Proposals will be permitted where:

- (i) some 40 dwellings will be provided within the identified residential area as shown on the Policies Map, of which 30% should be affordable;
- (ii) a new access is achieved off Harbour Road;
- (iii) screen tree and hedgerow planting employing native species is provided on the boundaries of the site; and
- (iv) development of RH10 does not adversely impact upon the Rye Harbour SSSI.

QUESTION 85: Do you agree with the requirements of Policy RHA1? If not, how would you wish to see it amended?

Development Boundary

- 15.96. The purpose of development boundaries is set out in Chapter 11.
- 15.97. It is proposed to amend the development boundary as set out on Figure 113 below.
- 15.98. The proposed amendment to the development boundary will reflect the new allocation in the village, together with the recent permission for 66 dwellings (net 65) at Donsmead, Station Road.
- 15.99. The proposed amendment to the development boundary will exclude both Pound Field and Coronation Field from the settlement boundary. Given the village lies in Flood Zone 3a, it is reasonable to exclude these greenfield areas from the settlement boundary. This would not be incompatible with their current use.

QUESTION 86: Do you agree with the proposed development boundary? If not, how would you like to see it amended?

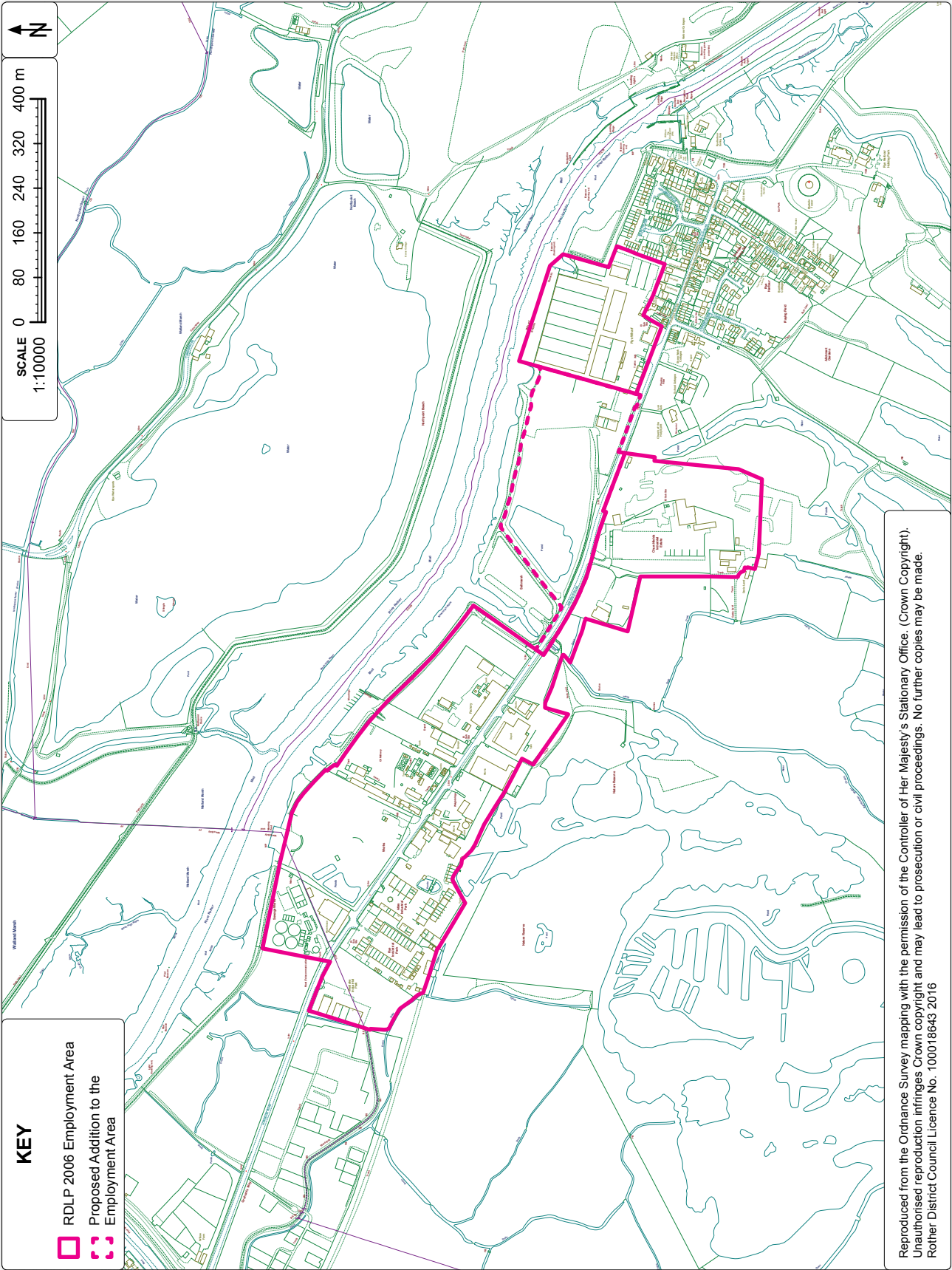
Employment

- 15.100. Harbour Road Industrial Estate is a long-established concentration of industrial uses and is the main employment area that serves the eastern half of Rother. The Estate measures approximately 37.7ha in size and is bisected by Harbour Road, which links both the Estate and Rye Harbour Village to the A259. Much of the existing employment land along Harbour Road has a very stark industrial appearance with many buildings close to and prominent from the road.
- 15.101. Harbour Road Industrial Estate can be described as being an elongated employment area and contains a long-established concentration of industrial uses. It incorporates Rye Wharf, the District's only commercial wharf for sea-going ships, with imports of aggregates and exports of grain to mainland Europe. While some uses still relate to its wharf-side origins, the area now accommodates a broad range of businesses and provides the main industrial area serving the eastern part of the District. Former uses for chemical manufacture and heavy industrial activities have resulted in concerns of contamination of a number of areas.
- 15.102. Harbour Road Industrial Estate also lies in Flood Zone 3a and is vulnerable to Tidal Flood Risk from the River Rother. The completion of the Rother Tidal Walls West together with the Winchelsea flood protection scheme (new groyne fields and shingle recharge) has significantly increased protection of the Industrial Estate from tidal flooding with the residual risk from a breach is considered low. Essential infrastructure should be designed and constructed to remain operational and safe in times of flood.
- 15.103. There are several opportunities for potential intensification of business activity within the existing employment policy area RHA2. Further intensification of employment uses on brownfield sites at Harbour Road is considered appropriate as it does not increase the footprint of the estate nor does intensification encroach onto the International Sites. As Harbour Road Estate lies within Flood Zone 3a, intensification uses on brownfield sites is also considered appropriate and considered to be less vulnerable relative to housing sites. Please refer to the Employment Sites Review: Background Paper for the Development and Site Allocations Local Plan (Sept 2016) for further details.
- 15.104. A recent permission to expand Wharf activity at the Saltings (RR/2013/1538/P) will bring an additional 13,550sqm of (B1, B2 and B8 Uses) floorspace. As a result, an amendment to the employment policy boundary is proposed, which is reflected in Figure 114 Harbour Road Industrial Estate Boundary Map. Furthermore, opportunities remain at Weslake Industrial Estate and Churchfield Industrial Estate for intensification.

Villages with site allocations

Rye Harbour

Figure 114. Harbour Road Industrial Estate Boundary Map



Policy RHA2: Harbour Road Employment Area

Within the Harbour Road Policy Area, as defined on the Policies Map, business development (Use Classes B1, B2 and B8) will be permitted where the following criteria are met:

- (i) proposals which result in a significant increase in vehicle, especially HGV, movements along Harbour Road adjoining the A259 will only be permitted with the satisfactory consent of the Highway Authority;
- (ii) it is demonstrated that proper account has been taken of any contamination by a competent person, including in relation to surface water drainage;
- (iii) proposals with frontages to Harbour Road must submit a comprehensive landscaping strategy to improve overall appearance of development;
- (iv) there is no adverse impact on the adjacent sites of national and international nature conservation importance; and
- (v) development shall not commence until measures to alleviate the potential risk from flooding have been put in place.

QUESTION 87: Do you agree with Policy RHA2 regarding the Harbour Road Industrial Estate and the proposed boundary changes? If not, how would you wish to see it amended?

Westfield

Context

- 15.105. The former iron-smelting village of Westfield straddles the A28 some three miles north of Hastings. Dating from Saxon times, the village grew up around the convergence of several small settlements. Westfield has experienced a relatively high level of post-war development and is now one of the larger villages in the District, with a population of just under 1,500.
- 15.106. The village has a reasonable range of local facilities and services, including a shop, doctor's surgery, primary school, church, community hall, several recreational facilities and some local employment. Supporting evidence also suggests a shortfall of a facility for older children/teenagers, although Westfield is well served in terms of children's play areas.
- 15.107. Westfield is wholly within the High Weald AONB and is surrounded by undulating farmland, woods and streams with a network of public footpaths, including the 1066 Country Walk. The floodplain of the River Brede and its tributaries lie to the north-west, although the village itself is relatively free from the threat of flooding.

Development Provisions

- 15.108. Westfield is classified as a Local Service Village within the Core Strategy. The village is required to deliver 89 dwellings from large sites. This includes the current planning permission for 39 dwellings at Westfield Down.

Site Options

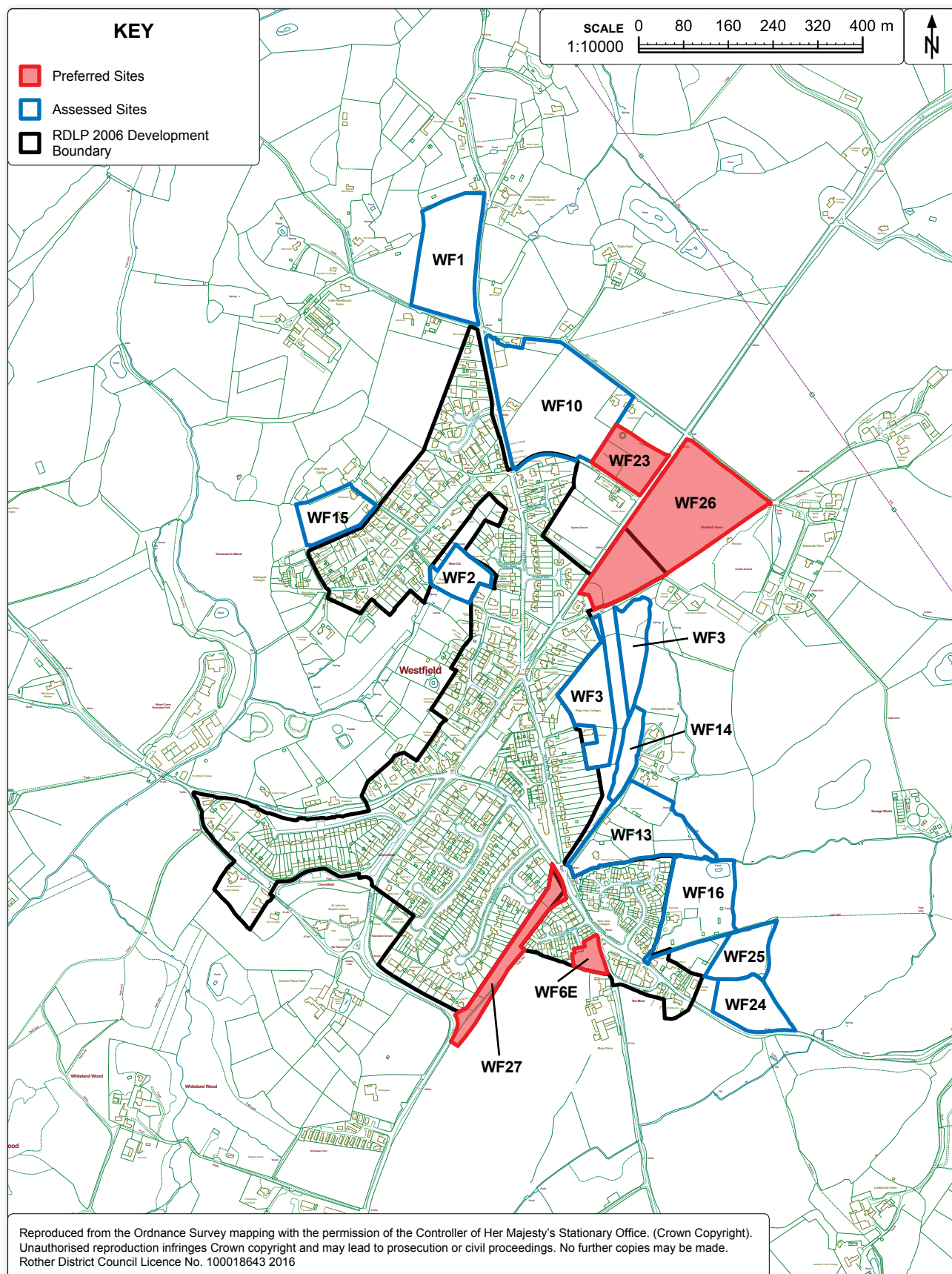
- 15.109. A number of sites have been considered (as seen on Figure 115 below) but there are topographical landscape constraints on outward expansion. The position of the village on a north-south elevated plateau is evident when approaching the village from the west, where there are also biodiversity constraints including ancient woodlands and wildflower meadows. The elevated far northern and north-western parts of the village enjoy distant views across the High Weald AONB. The southern edge of the village is generally well-defined and the land beyond existing limits is integral to the wider countryside setting.
- 15.110. Areas on the north-eastern side of the village appear to have the most potential for development to meet the identified needs, being relatively contained within wider landscape, relatively free of wider environmental impacts and reasonably connected to existing services. These include the southern end of Westfield Down (Ref. WF26) and the former Care Home at Moorhurst (Ref WF23).

- 15.111. In addition, one site at the southern end of the village – Land off Gould’s Drive (Ref. WF6E), which was part of a previous Local Plan allocation (VL9), still offers a suitable opportunity for a smaller area of residential development.
- 15.112. The assessment of all the housing sites identified on Figure 115 is contained in Appendix 3.
- 15.113. A further site (Ref. WF27) is proposed, not as a residential development, but as a green corridor pedestrian/cycle link to improve connectivity for sustainable modes of transport.

QUESTION 88: Do you agree with the preferred sites for development at Westfield? If not, which site(s) should be preferred?

Villages with site allocations Westfield

Figure 115. Westfield Options Map



Preferred Site: Land at Westfield Down (Ref: WF26)

Existing use(s)	Vacant greenfield (rough grassland).
Size	4.03ha
Key constraints/opportunities	<p>Land at Westfield Down is an unimplemented allocation from the Local Plan 2006 (Policy VL11).</p> <p>The site comprises rising ground extending out of the village on the east side of the A28. The lower section of the site to the south-west is more visually contained in terms of wider landscape setting and is within reasonable walking distance of all key local services. It is therefore suited to housing development.</p> <p>The higher ground to the north-east is more sensitive to building development, but could satisfactorily accommodate sports and recreational uses, for which there is a recognised need within the village, particularly pitches. In future, there may also be scope to provide an older children's/youth play facility/MUGA on the recreational land, as well as enhanced pedestrian links across the site.</p> <p>Vehicular access is currently proposed via a new joint access off the A28. An enhanced footway provision along the A28 would be advantageous.</p> <p>There may still be an option of upgrading the existing access to the Surgery, but this would also require a footway from the main road and a further highways assessment, taking into account impact on surgery parking.</p> <p>Because of the sloping nature of the land, some re-grading would be necessary, while screen planting would also help minimise its impact. SuDS are likely to be required at the southern and eastern boundaries of both residential and recreational areas. There appears to be an existing surface water flow path centrally down the site, connecting to an off-site tertiary river system. This will need careful management and incorporation into the scheme design to avoid off-site run-off issues.</p> <p>The provision of a tree belt across the northern boundary of the site would provide valuable screening from the wider High Weald AONB. In accordance with the advice of the Ecological Appraisal accompanying the previous application, bird and bat boxes should be installed along site boundaries to ensure the development can demonstrate a net biodiversity gain.</p>

Villages with site allocations

Westfield

Key constraints/ opportunities	As there is no physical division within the site, and because of the need for recreational facilities to serve the community, the housing development and recreational element should proceed in tandem.
Proposed use(s)	Residential and recreation (including pitches).
Developable area	1.2ha
Capacity	Approximately 39 dwellings, plus recreational uses and facilities.

Policy WES1: Land at Westfield Down, Westfield

Land at Westfield Down, Westfield (Ref. WF26), as shown on the Policies Map, is allocated for housing and recreation purposes. Proposals will be permitted where:

- (i) comprehensive proposals for both housing and recreational elements are put forward in tandem and the recreational land is secured;
- (ii) some 39 dwellings are provided at the southern end of the site, of which 40% are affordable;
- (iii) screen tree planting is provided on the northern boundary; comprising native species;
- (iv) recreation land includes pitches (at least one senior football pitch);
- (v) a new joint access is provided off the A28; or alternatively via an upgraded existing access to the Surgery; and
- (vi) sustainable drainage (SuDS) is provided to the satisfaction of the local planning authority.

QUESTION 89: Do you agree with the requirements of Policy WES1? If not, how would you wish to see it amended?

Figure 116. WF26 Aerial Map

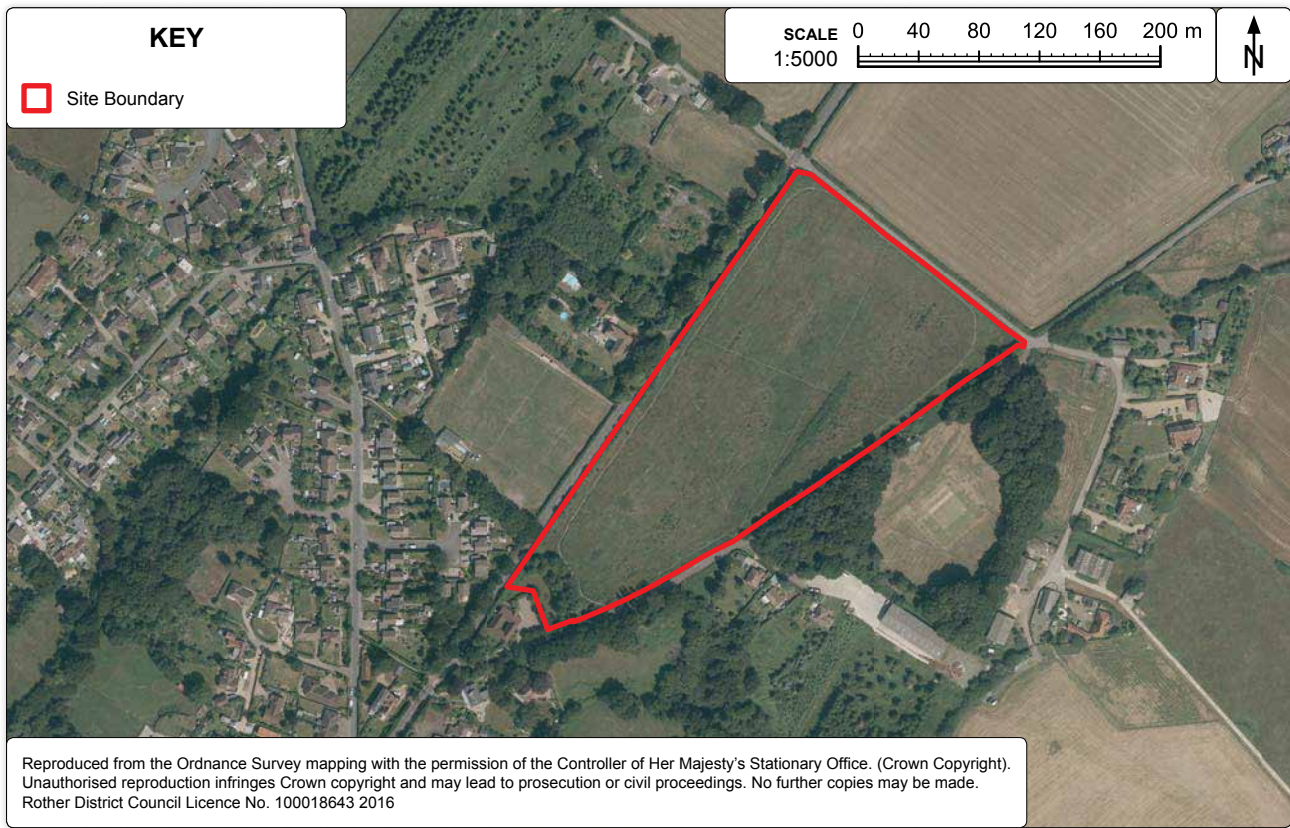
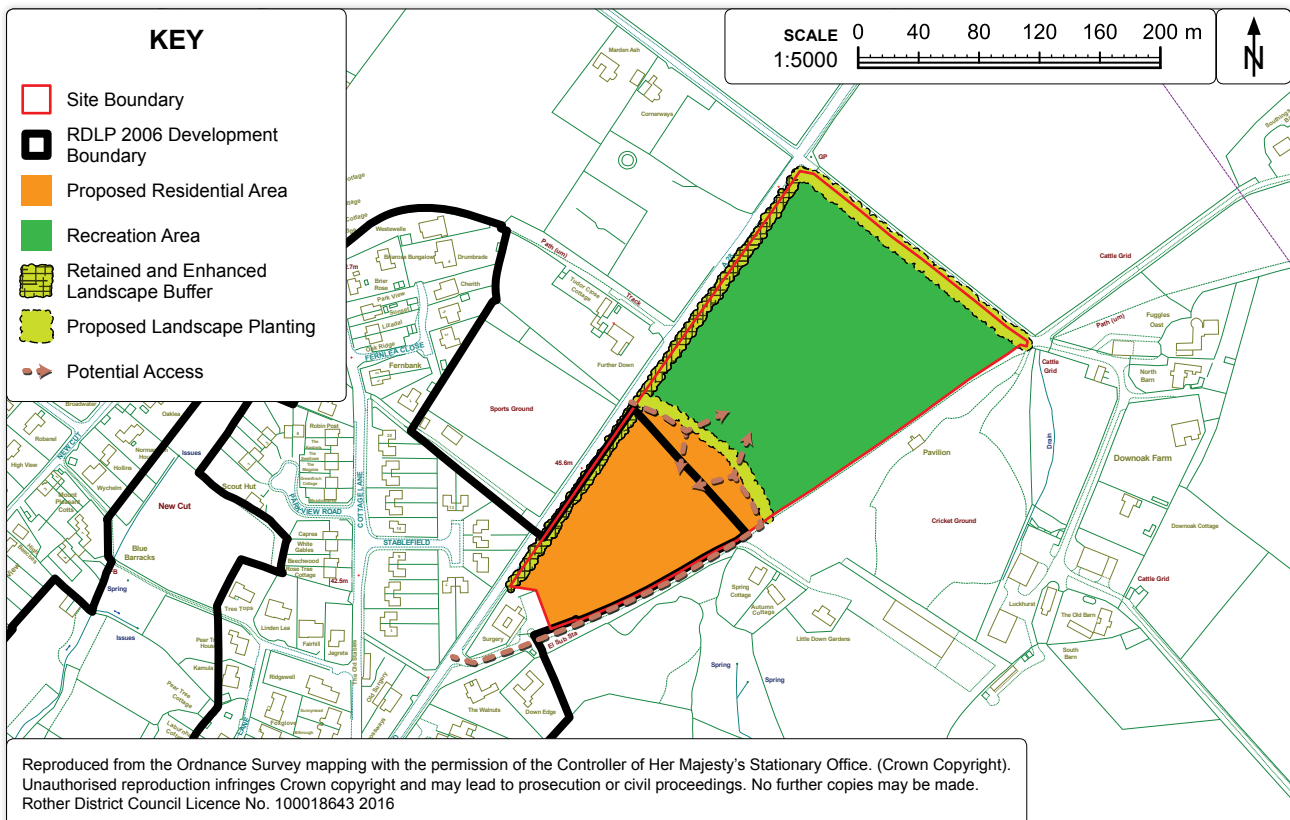


Figure 117. WF26 Detail Map



Villages with site allocations

Westfield

Preferred Site: Former Care Home, Moorhurst, A28, Westfield (Ref: WF23)

Existing use(s)	Brownfield site, interspersed with overgrown scrub and redundant and degraded formal gardens.
Size	0.88ha
Key constraints/opportunities	<p>Now a brownfield site that is cleared of buildings, the site had a previous function (and established use) as a residential care home. In addition, it has had a more recent permission (2009) for a 48 bed residential care unit with day therapy suite, outreach and consulting rooms (RR/2552/CC). However the latter was never implemented and has now expired. As a consequence, the site has remained vacant for many years.</p> <p>Although somewhat removed from the development boundary at present, the area will become more integrated within the village in the event of the Westfield Down site opposite being developed, the access of which may be just 60m south of the site boundary. The site is reasonably well screened from the surrounding AONB countryside by virtue of both topography and mature boundary trees (which will be important to maintain as far as possible, subject to access requirements). It is also free of flood risk, environmental designations or notable High Weald AONB character features.</p> <p>However, highways are a potential constraint to more intensive development along this stretch of the A28, which has a 40mph speed limit, rising to the national speed limit (60mph) just 50m north of the site boundary. A future use which generates trips in line with, or less than, the established use would not be problematic from a highways authority perspective, subject to mitigation measures prioritising sustainable forms of transport. The trip generation of the previous unimplemented permission provides a further benchmark of what can be considered reasonably likely to be acceptable, subject to further assessment. In respect of trip generation, particularly at peak times, retirement living/sheltered housing is broadly comparable to a care home and generates much less traffic than standard residential development.</p>

Key constraints/opportunities	<p>Retirement living/sheltered housing would be more in keeping with the established use in terms of catering for older persons housing needs. It would also be a re-use of the site that is supported by the parish council which would like to provide opportunities for local older persons to downsize, thus freeing up housing for families. These reasons, together with the recognised need to provide more housing suitable for older people in response to demographic projections, lead to the preferred option of an allocation for 'Retirement Living/Sheltered Housing'.</p> <p>For vehicles, utilisation of the existing northern access onto the A28 would be preferred, since this would minimise loss of trees/vegetation. However, this will require further investigation, including a highways safety audit.</p> <p>In order to make the development acceptable in planning terms, there are a number of measures that will be necessary to prioritise safe pedestrian access and sustainable forms of transport.</p> <p>A standard footway will need to be provided along the A28 connecting to the village core. This may require a traffic island and pedestrian refuge alongside the site. Pedestrian links westwards along footpath 27 connecting to Cottage Lane should also be enhanced to a safe standard and directly accessed from the site. In addition provision of pedestrian links across the Down site to the east would be advantageous. In addition, the Highways Authority recommends a bus stop should be provided immediately adjacent.</p> <p>The development should incorporate reinforced and enhanced native species landscape planting screening to fill in any gaps, particularly notable along the north-eastern boundary, to limit wider landscape impact. It is expected that communal gardens/amenity open space will be provided on-site at a level of 25sqm per dwelling unit. This provision, together with allowance for garden space for individual units and other constraints identified above, should allow for some 40 units to be provided.</p>
Proposed use(s)	Retirement Living/Sheltered Housing for older persons.
Developable area	0.8ha
Capacity	Approximately 40 units

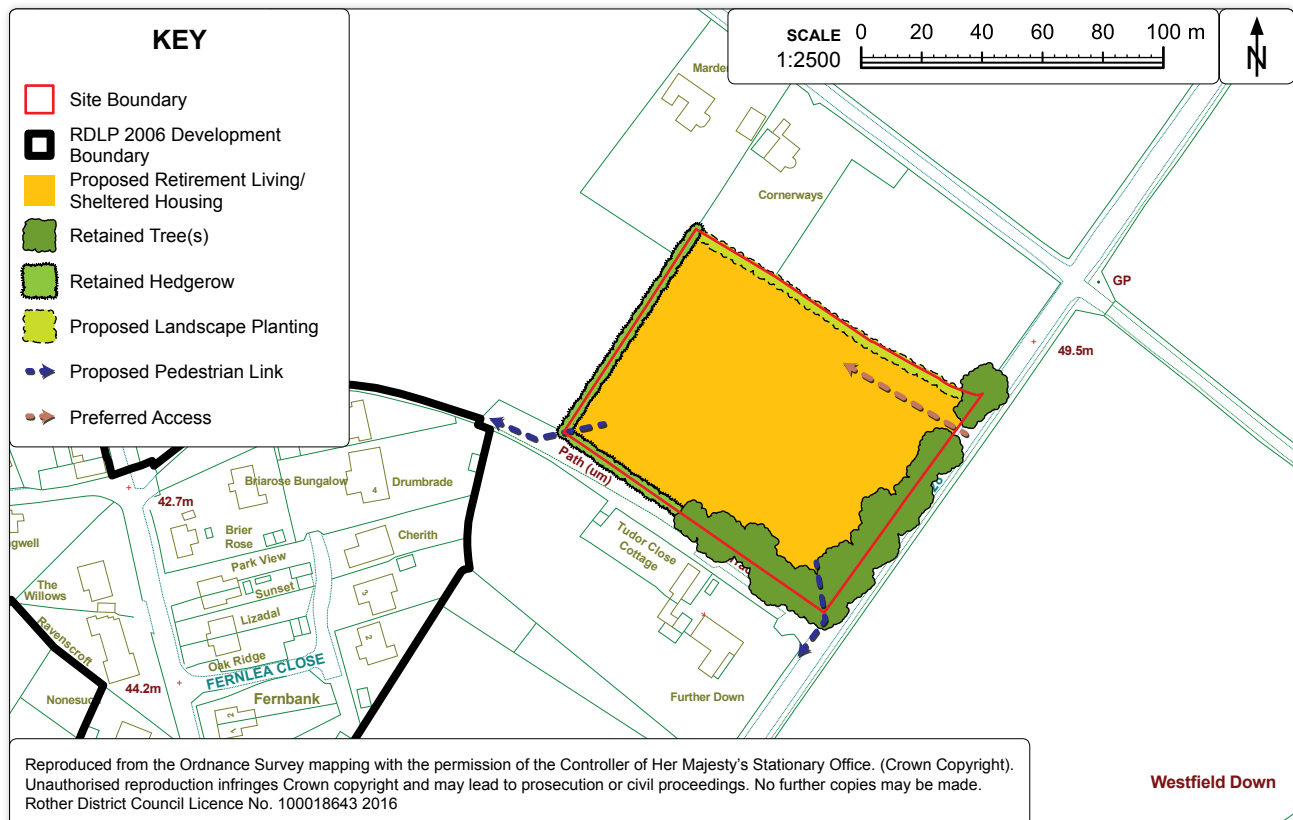
Villages with site allocations

Westfield

Figure 118. WF23 Aerial Map



Figure 119. WF23 Detail Map



Policy WES2: Land at the former Moorhurst Care Home, Westfield

Land at the former Moorhurst Care Home, Westfield (Ref. WF23), as shown on the Policies Map, is allocated for Retirement Living/Sheltered Housing. Proposals will be permitted where:

- (i) some 40 dwelling units are provided, of which 40% are affordable;
- (ii) a safe access to the A28 is demonstrated, with preference to utilising the previously established access;
- (iii) boundary trees and vegetation are retained and enhanced, with new native species landscape planting is provided to fill in gaps;
- (iv) communal gardens/amenity open space should be provided on-site to a minimum of 25sqm per dwelling unit; and
- (v) provision is made for:
 - (a) an upgraded footway along the A28 connecting to the village core, together with safe means of accessing it from the site;
 - (b) enhanced pedestrian links westwards along footpath 27 connecting to Cottage Lane; and
 - (c) a bus stop adjacent to the site.

QUESTION 90: Do you agree with the requirements of Policy WES2? If not, how would you wish to see it amended?

Villages with site allocations

Westfield

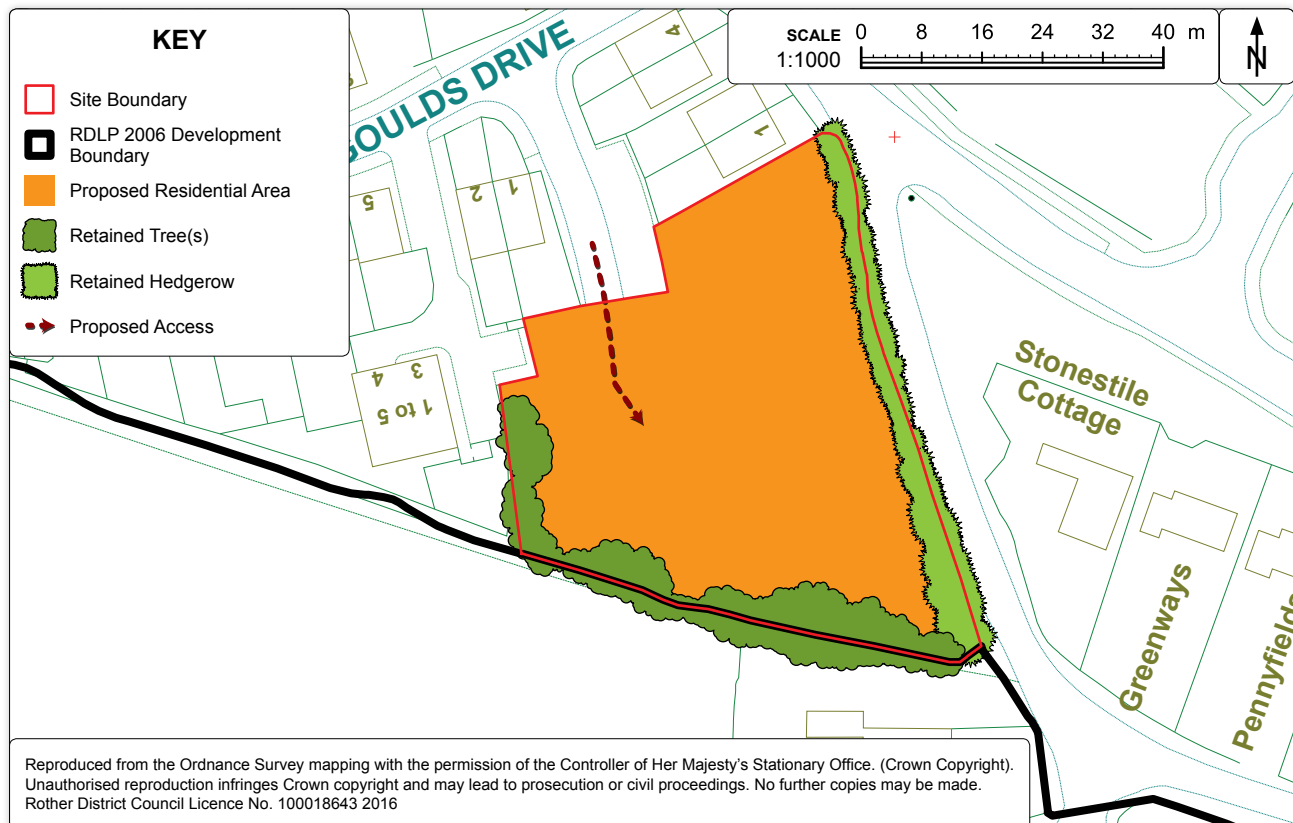
Preferred Site: Land off Goulds Drive, Westfield (Ref: WF6e)

Existing use(s)	Vacant Greenfield (rough grassland).
Size	0.27ha
Key constraints/opportunities	<p>The site represents an opportunity to complete the neighbouring estate development by accessing from Goulds Drive and is the last remaining unimplemented section from the 2006 Local Plan Policy VL9. As such, it requires re-assessment as part of the current plan process.</p> <p>Adjacent development is of a relatively high density and this development should reflect the same character.</p> <p>A public footpath (number 44) runs along the southern boundary of the site and connecting to this will increase permeability of the wider area.</p> <p>The southern section of the site is within the Hastings Fringes Biodiversity Opportunity Area. Maintenance of ecological networks is particularly important in this area. Existing trees and hedges already provide a good degree of screening from the surrounding AONB countryside and should be retained, with any gaps reinforced by native species planting.</p> <p>The southern boundary appears to be an existing surface water flow-path, although the site appears to have a gentle slope to the east and north. SuDS will need carefully considered to avoid surface water run-off to surround areas.</p>
Proposed use(s)	Residential.
Developable area	0.27ha
Capacity	Approximately 10 dwellings.

Figure 120. WF6e Aerial Map



Figure 121. WF6e Detail Map



Policy WES3: Land off Goulds Drive, Westfield

Land off Goulds Drive, Westfield, as shown on the Policies Map, is allocated for residential development. Proposals will be permitted where:

- (i) some 10 dwellings are provided including provision for affordable housing;
- (ii) vehicle access will be achieved off Goulds Drive;
- (iii) pedestrian access to footpath 44 on the southern boundary should be secured;
- (iv) existing landscaped boundaries around the site will be maintained and reinforced to minimise landscape and enhance ecological networks;
- (v) care should be taken to respect the amenity value and setting of adjoining properties on the northern and western boundaries; and
- (vi) incorporation of sustainable drainage (SuDS) to the satisfaction of the local planning authority.

QUESTION 91: Do you agree with the requirements of Policy WES3? If not, how would you wish to see it amended?

Preferred Site: Green Corridor and Pedestrian/Cycle Link, Moor Lane to the A28, Westfield (Ref: WF27)

Existing use(s)	Vacant, partially overgrown with vegetation. Southern section has an existing public footpath.
Size	0.77ha
Key constraints/opportunities	<p>This connection was a requirement of Policy VL9 from the 2006 Local Plan but has not been implemented. It offers a sustainable alternative link for pedestrians and cyclists by connecting a notable gap in the footpath network and providing a green transport corridor that extends almost the length of the village, connecting to the GP surgery and Westfield Down recreation development. Within the immediate vicinity, the link should connect directly to Goulds Drive and Greenacres.</p> <p>The allocation is also an ecological opportunity. The southern section of the allocation is within the Hastings Fringes Biodiversity Opportunity Area, which identifies opportunities for ecological networks, access improvements, urban biodiversity, and woodland management and restoration. Locally present protected species include the grass snake, common toad and the common dormouse. The link would benefit from planting of native species trees (subject to pedestrian safety security and surveillance) and habitat creation. Advice for encouraging reptiles, amphibians and small mammals via habitat creation can be found in Table 1 of the Green Infrastructure Study Addendum.</p>
Proposed use(s)	Green corridor and public footpath/cycle-route.
Developable area	Zero
Capacity	0 dwellings.

Villages with site allocations

Westfield

Figure 122. WF27 Aerial Map

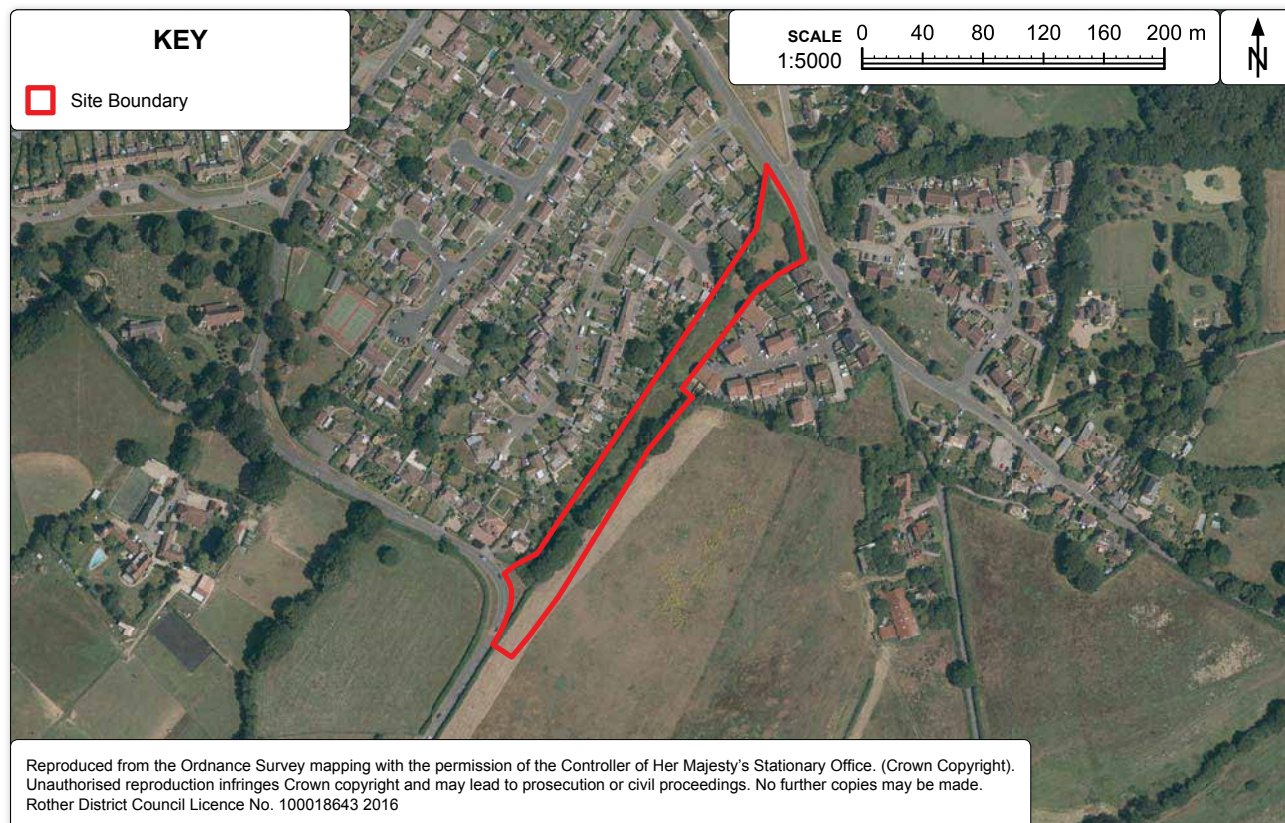
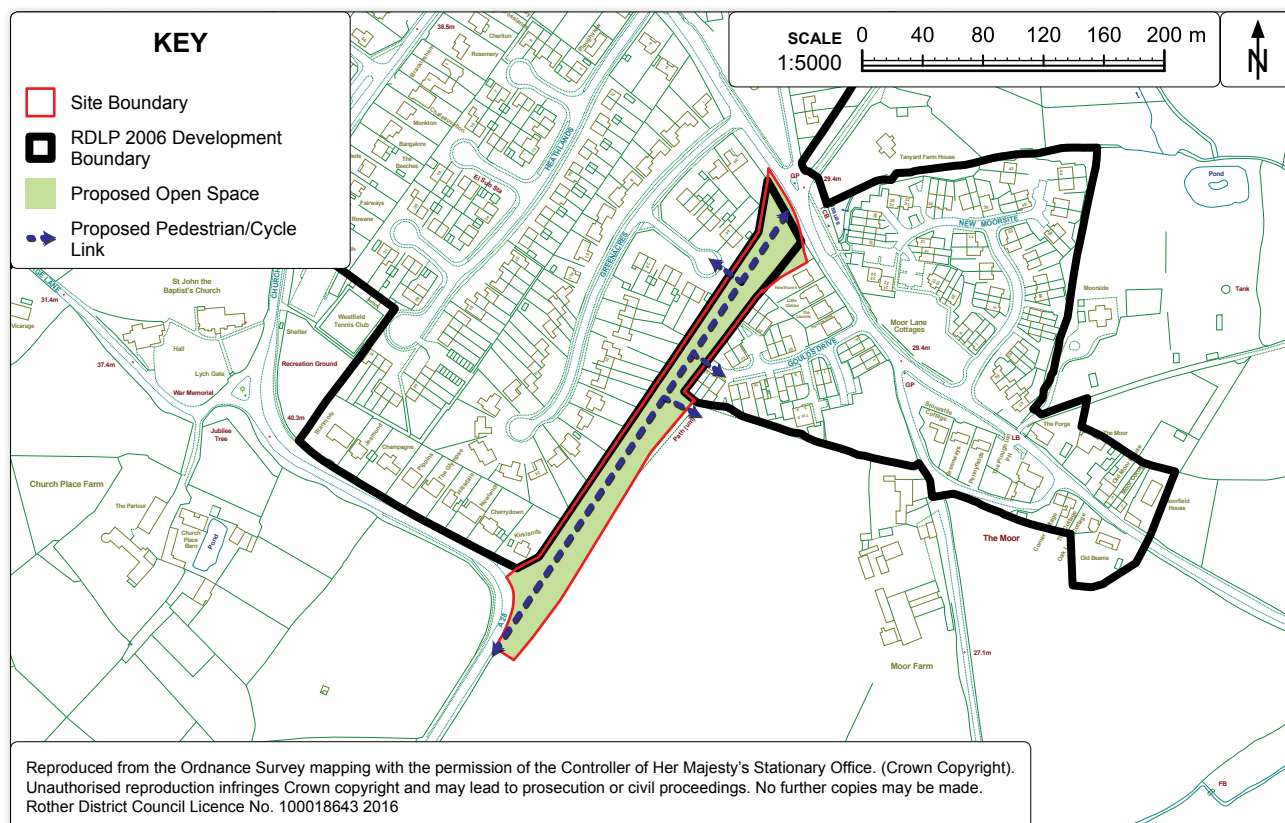


Figure 123. WF27 Detail Map



Policy WES4: Land connecting Moor Lane and the A28

Land connecting Moor Lane and the A28 is allocated as a green corridor and pedestrian/cycle Link. Proposals will be permitted where:

- (i) the link will connect directly to Gould's Drive and Greenacres;
- (ii) the link will also connect to footpath 44 along the southern edge of the Gould's Drive development boundary; and
- (iii) ecological improvements are implemented in accordance with the Hastings Fringes Biodiversity Opportunity Area and the Rother Green Infrastructure Study.

QUESTION 92: Do you agree with the requirements of Policy WES4? If not, how would you wish to see it amended?

Development Boundary

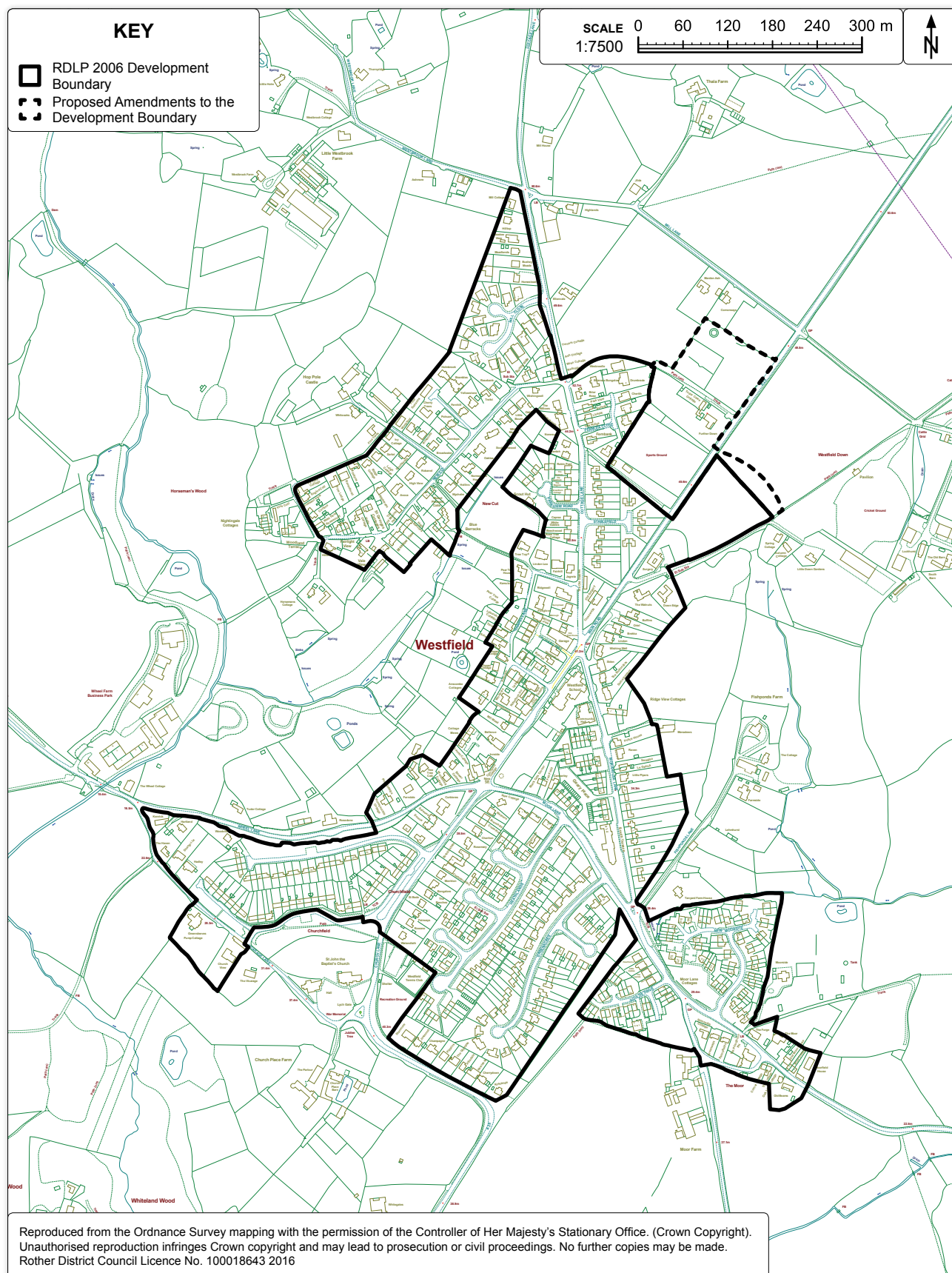
- 15.114. It is proposed to expand the development boundary to incorporate the proposed development allocations. This entails a large expansion to subsume WES2, as well as a smaller expansion of an area of WES1 that was not previously within the development boundary.
- 15.115. In order to incorporate the developable area of WES2, other intervening land will necessarily also be included within the expanded development boundary. However, this should not be interpreted as an indication that these areas are necessarily also suitable for development, or more intensive development. The expansion includes a football pitch, but as a general principle public open spaces are not incompatible with a location within the development boundary and remain subject to the protection of Core Strategy Policy CO3.
- 15.116. Smaller scale expansion of the development boundary has also been requested on Cottage Lane, but is not considered appropriate due to the impact on the rural area.

QUESTION 93: Do you agree with the proposed development boundary? If not, how would you like to see it amended?

Villages with site allocations

Westfield

Figure 124. Westfield Development Boundary Map



16. Other Villages with Development Boundaries in the 2006 Local Plan

Context

- 16.1. The 'Use of Development Boundaries' was covered by Core Strategy Policy OSS2 and Policy DI2 within this document. In addition to the reviews undertaken within the sections on individual settlements, it is necessary to review the development boundaries of other, typically smaller, settlements which don't have a housing number apportioned to them, including:
- Brede and Cackle Street
 - Guestling Green
 - Icklesham
 - Norman's Bay
 - Pett and Friar's Hill
 - Pett Level
 - Staplecross
 - Three Oaks
 - Winchelsea
 - Winchelsea Beach
- 16.2. Other settlements which didn't have a development boundary in the previous Local Plan (2006) have also been reviewed. None are considered suitable for the application of a development boundary in the current plan. By implication, sites submitted for development in such settlements have also been rejected.

Brede and Cackle Street (Figure 125.)

- 16.3. Brede and Cackle Street are strongly linked with the neighbouring village of Broad Oak located within one mile to the north. The three villages form a relatively compact cluster of settlements running north-south along the A28 Northiam Road. Brede and Cackle Street are situated on the south facing slopes of the Brede valley and both villages are located within the High Weald AONB. Broad Oak is the larger settlement and contains a range of services.
- 16.4. There is a regular bus service to Hastings, Northiam and Tenterden. Both Brede and Cackle Street themselves have modest levels of service provision. Brede has a church and a public house. Cackle Street has a community hall which serves the wider area.
- 16.5. The development boundary is still regarded as appropriate, properly reflecting the more built up areas of the villages, whilst also maintaining the valuable open countryside gap between them.

Other Villages

with Development Boundaries in the 2006 Local Plan

- 16.6. One minor amendment to the development boundary is proposed to incorporate the full extent of the garden at the property, Hilltop on the main road at the southern end of Brede. This would be a logical 'rounding off', consistent with other adjacent properties to north and south of Hilltop. There would be no significant negative impact on the wider AONB landscape, subject to the retention of the belt of native Scots Pines.

QUESTION 94: Do you agree with the recommendation regarding the development boundary at Brede and Cackle Street? If not, please explain how you wish the development boundary to be applied to this settlement?

Guestling Green (Figure 126.)

- 16.7. Policy OSS2 of the Core Strategy establishes the principle of development boundaries within Rother District but did not define their boundaries. The 2006 Local Plan 'saved Policy' DS3 defines the physical development boundaries on the relevant 'Inset Maps'. It is therefore the role of this document to review these development boundaries. The existing development boundary is shown in Figure 126 below.
- 16.8. The preferred site for development in Guestling Green is physically separate from the development boundary of the main village and it is not considered appropriate to extend the development boundary to include all the ribbon development along Chapel Lane specifically to include this site within the development boundary. Therefore, it is considered most appropriate to not include the site within any development boundary.
- 16.9. The development boundary has been reviewed to see if there is any scope for small-scale development boundary amendments, where there may be development opportunities. As part of this review, consideration was made to whether sites are surrounded by development which have well-defined natural boundaries or topographical features, thereby creating a new defensible edge to the area. The function of the land and its relationship to the settlement are also important factors.

- 16.10. In reviewing the potential for small-scale development boundaries amendments in Guestling Green, it is considered that there is little scope to provide infill and rounding off opportunities that are physically, functionally and visually well related to the existing urban area, taking account of any environmental development constraints. Typically, those areas which are adjacent to the existing development boundaries are open areas which visually relate to the open countryside rather than the village and their inclusion would harm the structure, form and character of the adjacent countryside. Therefore no development boundary amendments are proposed for Guestling Green.

QUESTION 95: Do you agree with the recommendation to retain the development boundary at Guestling Green in its existing form? If not, please explain how you wish the development boundary to be applied to this settlement?

Icklesham (Figure 127.)

- 16.11. Icklesham is situated approximately two miles west of Winchelsea, five miles north-west of Hastings. A linear village, much of the original settlement fronted the A259, but more recent development has taken place in depth, to the north of the A259. Icklesham lies with the High Weald AONB is relatively well served by a peak time bus service to Rye and Hastings Conquest Hospital (Bus number 100). The village has a primary school, village hall, a recreation ground, a pub, and a church but has seen its main village store close recently but a local farm shop remains open in the village. There is also some employment provision at the Little Sherwood Industry Park. Icklesham has a well-defined built up area, set against open landscape with few opportunities for extensions of the settlement boundary. The continued application of the development boundary to the village is considered appropriate.

QUESTION 96: Do you agree with the recommendation to retain the development boundary at Icklesham in its existing form? If not, please explain how you wish the development boundary to be applied to this settlement?

Other Villages

with Development Boundaries in the 2006 Local Plan

Norman's Bay (Figure 128.)

- 16.12. Norman's Bay is a quiet and isolated settlement situated on the shingle banks of the Pevensey Levels coast. A notable heritage feature is the Martello Tower which was part of the Napoleonic defences of England in the early 1800's. The village is dominated by two large caravan/camping sites, highlighting the importance of this area of largely undeveloped coast for tourism and leisure purposes. The village has a train station, but no bus service. The eastern caravan site has a small shop, but services are generally extremely limited in this location.
- 16.13. The village had two separate areas within the 2006 Local Plan development boundary, both abutting the shingle beach. At present time, these are entirely within the high probability flood zone (Flood Zone 3) based primarily on tidal models. The vast majority of the surrounding area, including all access points to the village is also Flood Zone 3, based on both fluvial and tidal models. Within this zone, national guidance stipulates that 'more vulnerable' forms of development, including residential, be subject to the exception test. This requires development to demonstrate wider sustainability benefits to the community that outweigh flood risk. Whilst the Shoreline Management Plan proposes to 'Hold the line' in this area until at least until the year 2105, the Strategic Flood Risk Assessment (SFRA) makes special reference to Normans Bay and the development constraints imposed. SFRA analysis indicates the main access road to the village would be at risk of particularly deep flooding in the event of a breach.
- 16.14. The main village is surrounded by marshland to the North, which is internationally protected, both as Ramsar and Special Area of Conservation, the latter designated in March 2016. The shingle beach at Norman's Bay is a designated Site of Nature Conservation Importance (SNCI). The Habitats Regulations Assessment (HRA) process has highlighted concerns with water quality within the Pevensey Levels international sites, for which cumulative run-off from development within the wider hydrological catchment area can be a contributory factor.
- 16.15. Core Strategy policies RA2 and EC6 facilitate tourism development in appropriate circumstances, while Policy RA3 allows for the one-for-one replacement of existing dwellings. However, given the very limited services and considerable environmental constraints, particularly flood risk, Normans Bay is not considered an appropriate or sustainable location to promote more intensive development, particularly residential. Therefore, the continued application of a development boundary to Normans Bay is not considered appropriate in this plan.

QUESTION 97: Do you agree with the recommendation to remove the development boundary at Norman's Bay? If not, please explain how you wish the development boundary to be applied to this settlement?

Pett and Friar's Hill (Figures 129. and 130.)

- 16.16. Pett is a linear village about four miles from Hastings and is the main settlement within the parish of the same name. The village is washed over by the High Weald AONB and the surrounding area is a mix of agriculture and woodland, much of it ancient. Within the 2006 Local Plan, Pett and Friar's Hill have two separate areas of unequal size within the development boundary – the main (and larger) area of Pett to the east and a much smaller outlying area of Friar's Hill to the west.
- 16.17. The smaller area is situated on the Pett Road (C23) between the Hastings fringes (Bachelor's Bump), Pett village and Guestling Green, but physically divorced from all three. It consists of about 25 dwellings of a mix of ages and styles, including a handful of Grade II listed cottages. There are no services at all at this location and as a consequence it is not an appropriate or sustainable location to promote more intensive development. Therefore, the continued application of a development boundary to this outlying area is not considered appropriate in this plan.
- 16.18. The larger main section of Pett village has a reasonable range of services including a village hall, two public houses, a play area, sports pitch and a church. However, there is no primary school, no convenience shop and no village centre as such, with services dotted across the extent of the village. Nonetheless, it is considered Pett is a settlement of sufficient stature to warrant retention of the main section of its development boundary. Just one minor amendment is proposed to this main area, in order to remove an area of ancient woodland. By implication, sites that have been submitted for consideration to be allocated (and hence extend the development boundary) have been rejected.

QUESTION 98: Do you agree with the recommendations regarding the development boundaries at Pett and Friar's Hill? If not, please explain how you wish the development boundary to be applied to this settlement?

Pett Level (Figure 131.)

- 16.19. Pett Level is situated on a stretch of marshland which leads to Winchelsea in the East and rises to Fairlight Cliffs in the west. In summer months the village is popular with tourists. A distinctive local feature is that Pett Level marks the western end of both the 1940s sea defence wall and the Royal Military Canal, which was built in 1804 to protect against invasion from Napoleon. The Saxon Shore Way passes through Pett Level.
- 16.20. The village has a relatively small population and a limited range of services, which largely cater for visitors, notably the Smugglers Inn and the new Beach Club, both of which sit in the busier coastal section of the village.

Other Villages

with Development Boundaries in the 2006 Local Plan

- 16.21. In the 2006 Local Plan, Pett Level had three separate areas within the development boundary, each with a distinct character, as set out below.
- 16.22. The 'hub' of the village, the eastern coastal stretch, is also the most environmentally constrained. It is now being almost entirely surrounded by internationally protected Ramsar and Special Protection Area (SPA), both of which directly abut the development boundary. In addition, this section is entirely within the high probability flood zone (Flood Zone 3) based primarily on tidal models. Within this zone, national guidance stipulates that 'more vulnerable' forms of development, including residential, be subject to the exception test. This requires development to demonstrate wider sustainability benefits to the community that outweigh flood risk. Whilst the Shoreline Management Plan proposes to 'Hold the line' in this area until at least until the year 2105, the analysis within Strategic Flood Risk Assessment (SFRA) indicates a risk of particularly deep flooding in the event of a breach.
- 16.23. The western and northern sections of Pett Level's development boundary have a notably different character. The intervening and lower lying sections, including Canal Bank and the southern end of Chick Hill, are within Flood Zone 3 based on tidal modelling. Rising to the west is an area of lower density housing, sometimes referred to as Cliff End. There are serious constraints on vehicular access here, the roads are narrow and unadopted roads, while visibility is constrained at access points. Both western and northern sections of the village are more visually exposed, well treed, lack pedestrian footways, have virtually no services combined with a sense of rural seclusion and tranquillity. The prevailing character and constraints do not lend themselves to intensification.
- 16.24. The overall conclusion of these various considerations is that the continued application of a development boundary is not appropriate to any of the three distinct sections of Pett Level.

QUESTION 99: Do you agree with the recommendation to remove the development boundary at Pett Level? If not, please explain how you wish the development boundary to be applied to this settlement?

Staplecross (Figure 132.)

- 16.25. Located on a ridge above the Lower Rother Valley, Staplecross is situated between Northiam to the east, Robertsbridge to the west and Sedlescombe to the south. It is the largest settlement in the parish of Ewhurst. Staplecross is a reasonably compact village within its 2006 Local Plan defined development boundary centred upon a junction of the B2165. The village has a number of services and amenities available to local residents including a pub, a village shop, children's play area, village hall and a primary school.

- 16.26. The Local Plan Core Strategy identified a relatively modest target for new housing over the Plan Period to 2028 of some 25 dwellings in addition to a recently built affordable housing Exception Site, on the eastern edge of the village, along Northiam Road (B2165) which provides 8 new local needs affordable dwellings given approval in 2011 (RR/2011/2393/P).
- 16.27. This housing requirement of 25 dwellings has already been accommodated by the outline permission (RR/2014/1256/P) of a scheme for 25 dwellings on land east of Cricketers Field with vehicular access from the B2165 Northiam Road. It was granted permission on 25 August 2016 (RR/2016/647/P).
- 16.28. It follows that the development boundary at Staplecross should be amended to reflect the extent of both the above schemes. However, given the absence of opportunities for expansion into the very rural and distinct countryside setting, no other development boundary amendments proposed.

QUESTION 100: Do you agree with the recommendation regarding the development boundary at Staplecross? If not, please explain how you wish the development boundary to be applied to this settlement?

Three Oaks (Figure 133.)

- 16.29. Three Oaks is a small village bisected by the Hastings to Rye railway. It is principally linear in form and has a limited range of local services, including a pub, a village hall, a church and a play area. There is a limited rail service (approx. every 2 hours in each direction) and no bus service. The settlement is located approximately one mile off the A259 trunk road, and the local service village of Westfield is located to the north-west of the village. The village also lies in the AONB, Flood Zone 3 lies to the west of the village and there are clusters of Ancient Woodland to be found to the southern and northern edge of the village. While there is limited provision of services to be found in the village, the presence of a rail station, together with its well-consolidated nature to warrant the continued application of a development boundary for no changes are proposed to the existing development boundary, which properly reflects the ribbon nature of the settlement.

QUESTION 101: Do you agree with the recommendation to retain the development boundary at Three Oaks in its existing form? If not, please explain how you wish the development boundary to be applied to this settlement?

Other Villages

with Development Boundaries in the 2006 Local Plan

Winchelsea (Figure 134.)

- 16.30. Winchelsea is officially a town, albeit the smallest in the country with a population of just fewer than 600. It is of immense historic and archaeological interest and value, and is an outstanding and rare example of medieval town planning. The settlement was planned by Edward 1 in the 13th Century as a 'bastide town'¹, and the formal grid structure of the historic street pattern is still clearly visible today and is a crucial element in defining its character. The citadel dominates the surrounding landscape. The grid layout of weatherboard and tile cottages, stone church and windmill, stands above steep wooded bluffs on which medieval gates are conspicuous.
- 16.31. Winchelsea has a good range of services including a primary school and convenience shop. The development boundary established by the 2006 Local Plan serves to define the existing form and pattern of the town. Given the town's status, the development boundary is worthy of retention, although in reality there is extremely limited scope for more intensive development due to the considerable heritage constraints.
- 16.32. However, it is not considered appropriate to extend the town boundary any further. Most options for expansion would entail encroachment onto surrounding wooded bluffs, thus detracting from the historic formal grid structure established by the historic hilltop settlement.

QUESTION 102: Do you agree with the recommendation to retain the development boundary at Winchelsea in its existing form? If not, please explain how you wish the development boundary to be applied to this settlement?

Winchelsea Beach (Figure 135.)

- 16.33. Winchelsea Beach is situated on low lying land behind the sea wall between the mouth of the River Rother to the east and Fairlight Cliffs to the west. The northern section along Sea Road is essentially linear ribbon development connecting as far north as the A259. At the southern coastal section of the village, a static caravan park and more in depth development is located.
- 16.34. Winchelsea Beach has grown in an ad-hoc fashion and today has a population of just fewer than 600 which swells considerably in the summer months due to tourism. Local services, which serve both visitors and permanent residents, include a post office, convenience shop, pub, village hall, sports pitch, play area and church. However there is no primary school.

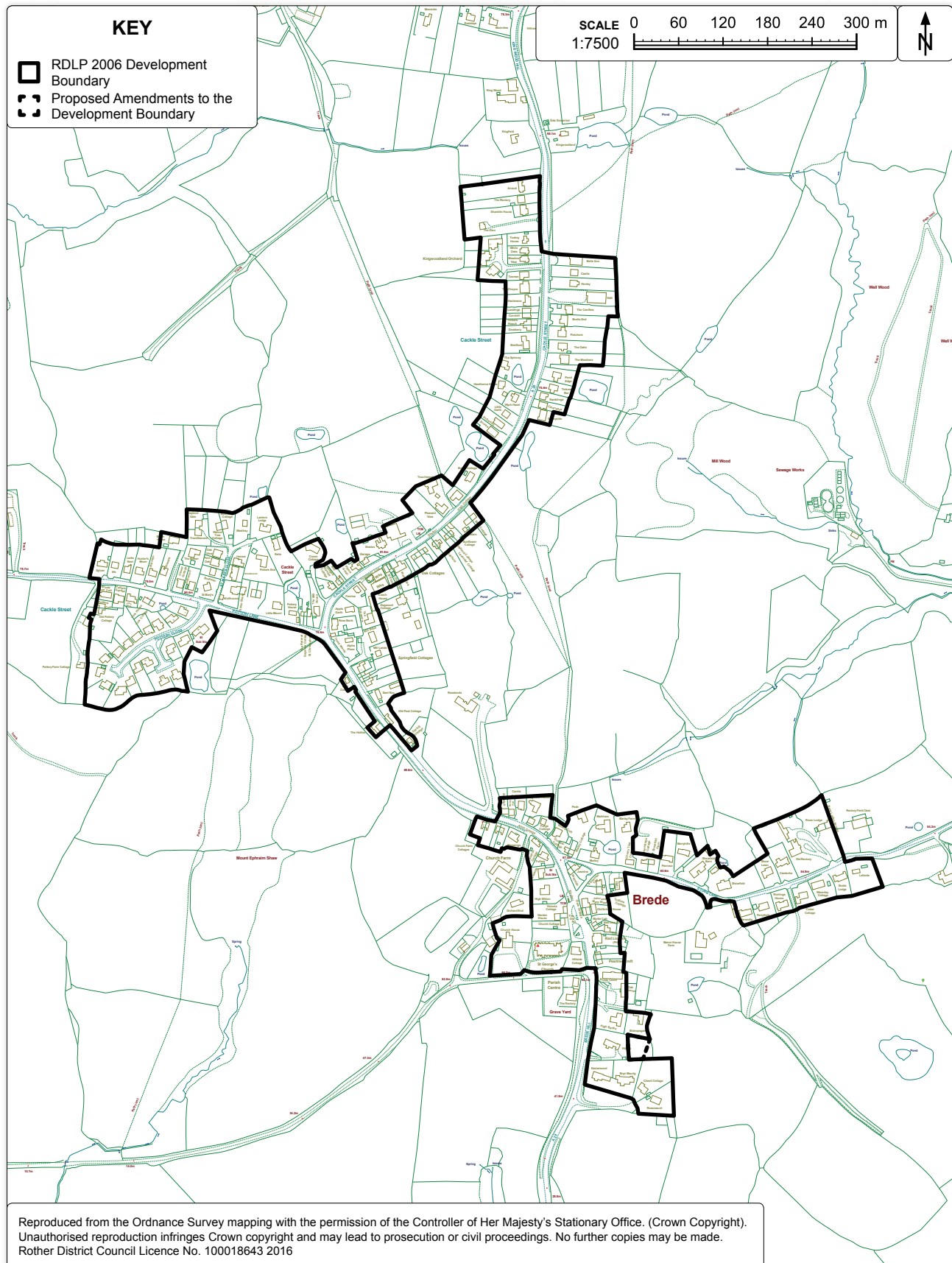
¹ Bastides were originally walled towns, centred around a market square, with the houses set in narrow streets, often to a grid layout. The bastides were fortified to protect the inhabitants from outside attack.

- 16.35. Much of the surrounding area is undeveloped coast which is protected internationally as Ramsar wetlands and also nationally as Site of Special Scientific Interest (SSSI). Indeed, parts of the SSSI actually overlap with the development boundary established by the 2006 Local Plan.
- 16.36. Flood risk represents a serious issue in Winchelsea Beach. The settlement is almost entirely within the high probability flood zone (Flood Zone 3) based primarily on tidal models. Within this zone, national guidance stipulates that 'more vulnerable' forms of development, including residential, be subject to the exception test. This requires development to demonstrate wider sustainability benefits to the community that outweigh flood risk. The Shoreline Management Plan proposes to 'Hold the line' in this area until at least the year 2105. However, the Strategic Flood Risk Assessment analysis indicates a potentially high level of flood hazard in the event of a future sea wall breach.
- 16.37. Given the considerable environmental constraints, particularly flood risk, Winchelsea Beach is not considered an appropriate or sustainable location to retain a development boundary. In accordance with the provisions of the national 'exception test' for flood risk, it is considered that there are other locations within the District where it is more appropriate to promote more intensive development and no over-riding sustainability benefits to the community in doing so in Winchelsea Beach.
- 16.38. The 2006 Local Plan included a policy (VL12) addressing 'Land at Victoria Way and south of Harbour Farm' in Winchelsea Beach. The Environment Agency subsequently indicated they would not support the continuation of Local Plan Policy VL12 into a future plan. This is on the basis that allocating the sites for permanent dwelling houses would also put the occupiers at an unacceptable risk in the event of flood defences in this location being breached and this risk would be made worse by the effects of climate change. In any event, VL12 required a comprehensive scheme offering significant environmental improvements including an orderly improvement of access and there seems little prospect of a comprehensive scheme with these improvements coming forward.
- 16.39. Local Plan Core Strategy 'countryside' policies are sufficiently flexible so as to allow Winchelsea Beach to continue as a vibrant settlement. Notably, policies RA2 and EC6 facilitate tourism development in appropriate circumstances, while Policy RA3 allows for the one-for-one replacement of existing dwellings.

QUESTION 103: Do you agree with the recommendation to remove the development boundary at Winchelsea Beach? If not, please explain how you wish the development boundary to be applied to this settlement?

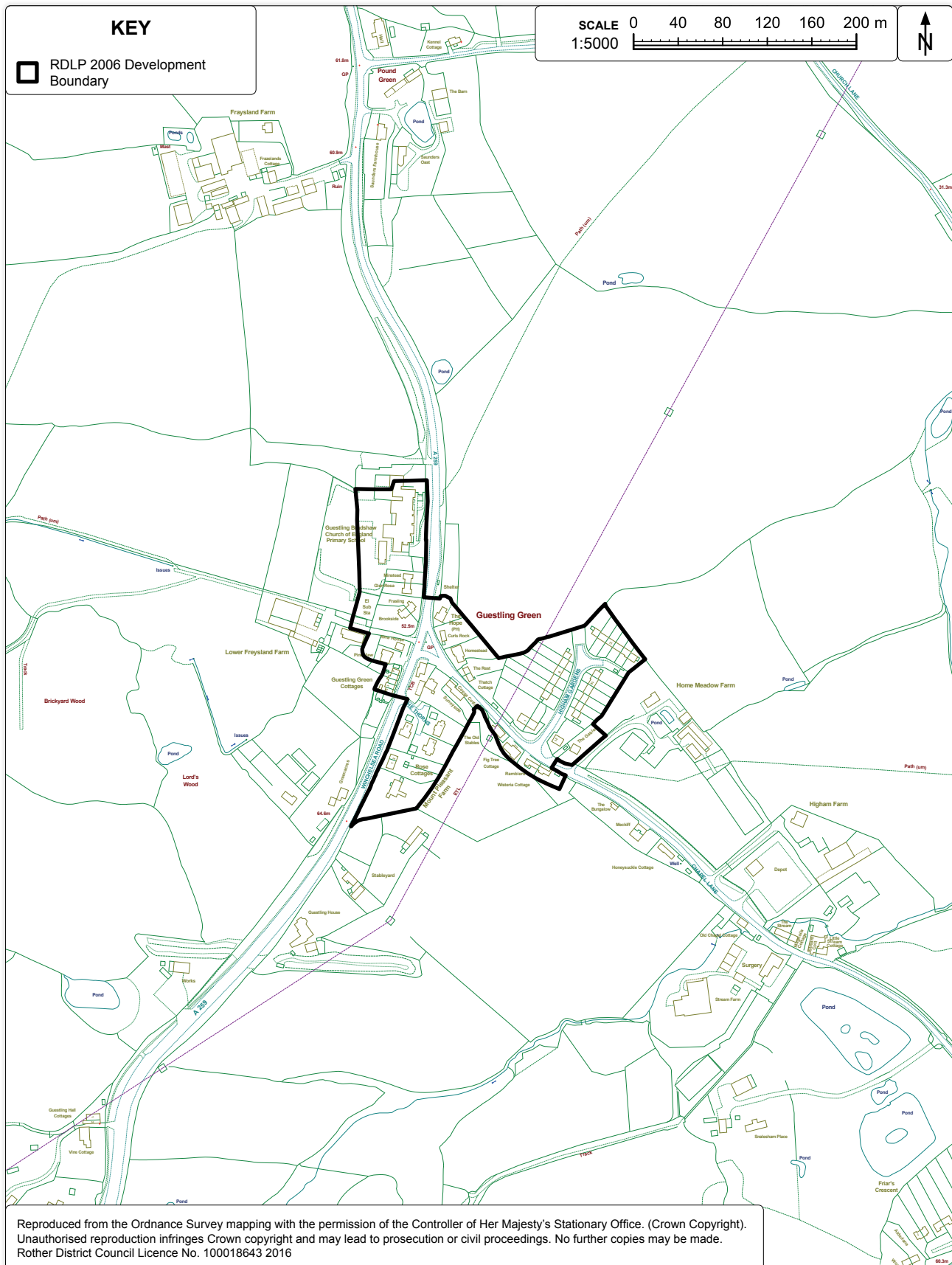
Other Villages with Development Boundaries in the 2006 Local Plan

Figure 125. Brede and Cackle Street Development Boundary Map



Other Villages with Development Boundaries in the 2006 Local Plan

Figure 126. Guestling Green Development Boundary Map



Other Villages with Development Boundaries in the 2006 Local Plan

Figure 127. Icklesham Development Boundary Map

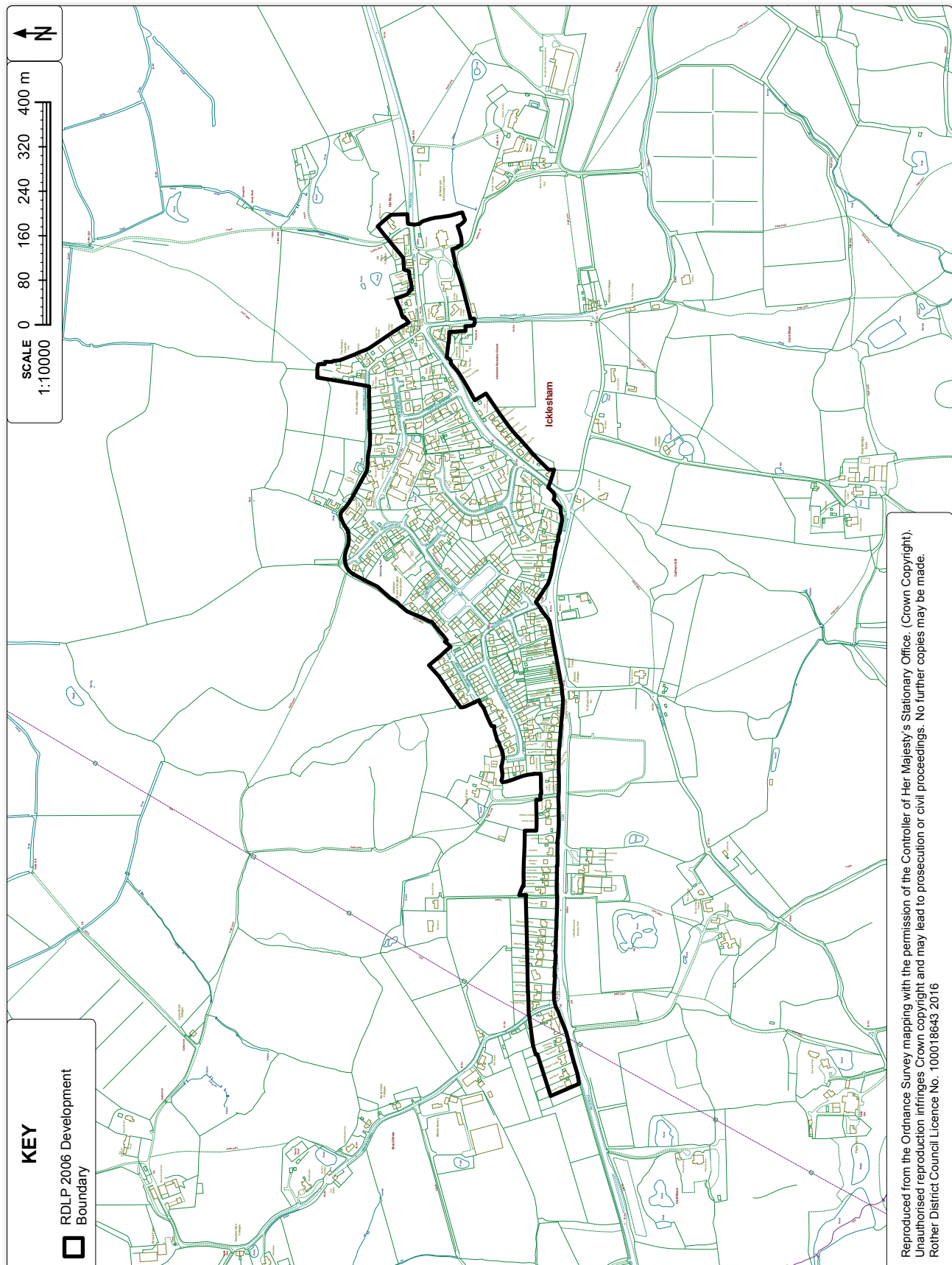
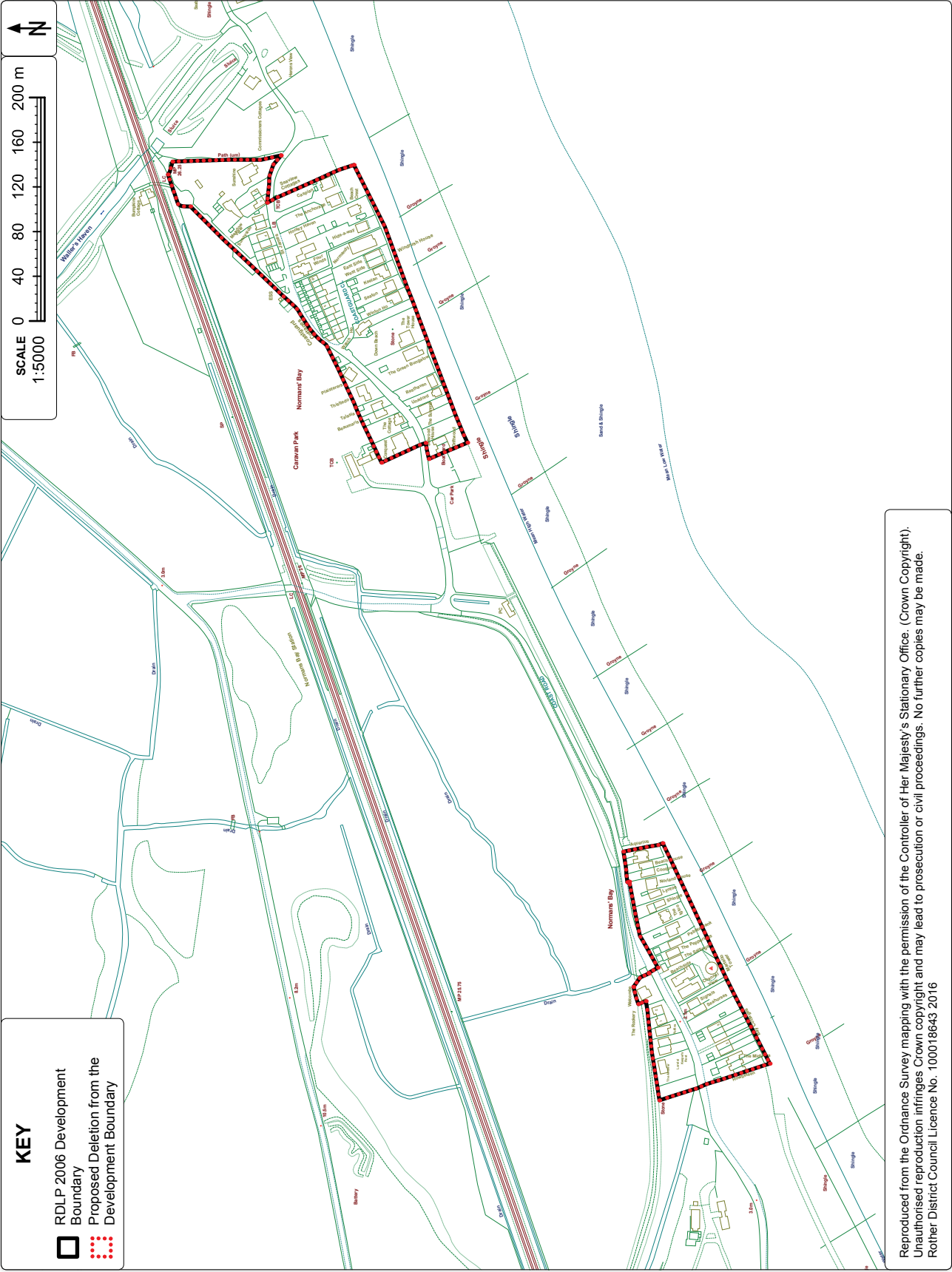
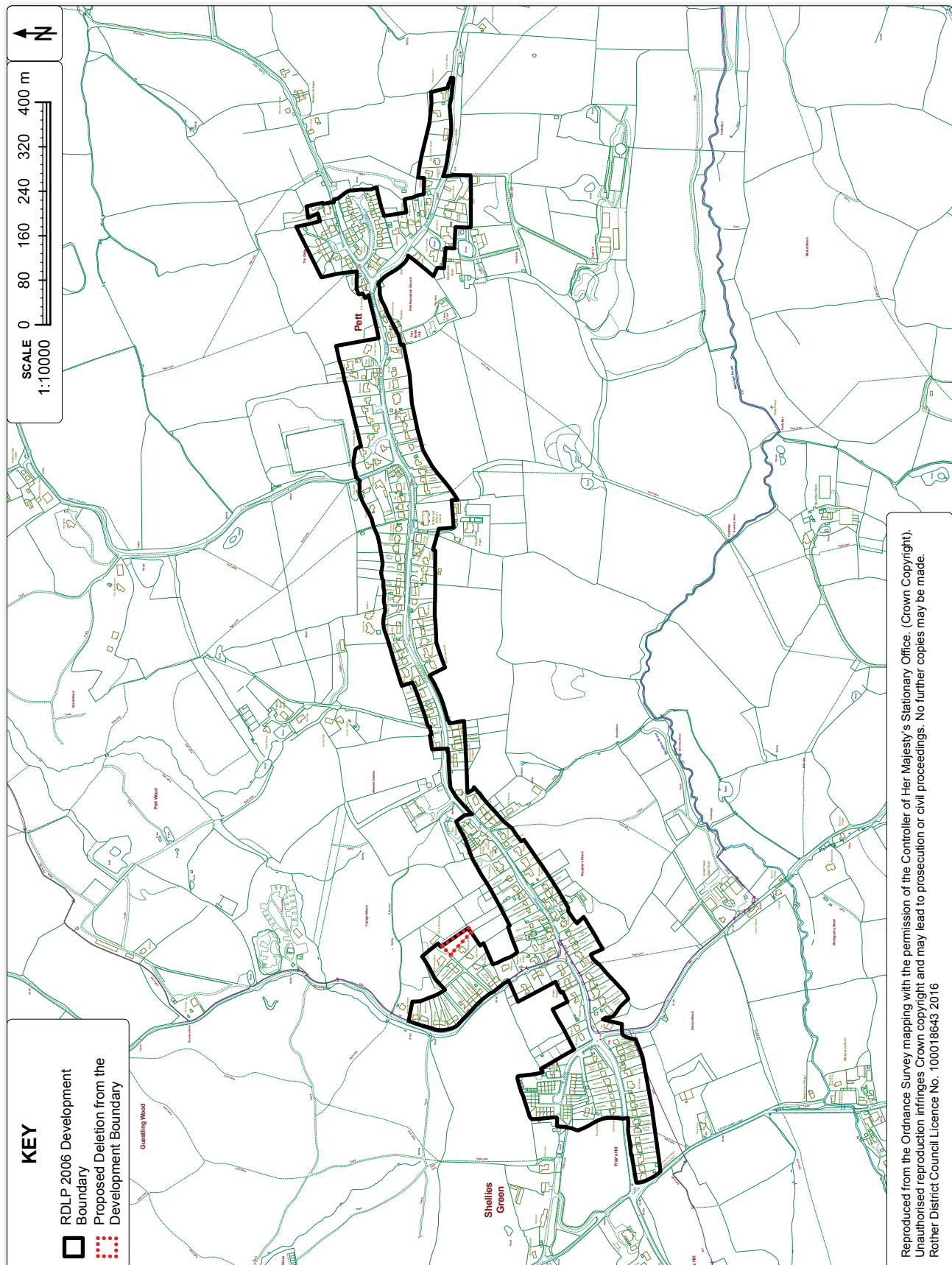


Figure 128. Norman's Bay Development Boundary Map



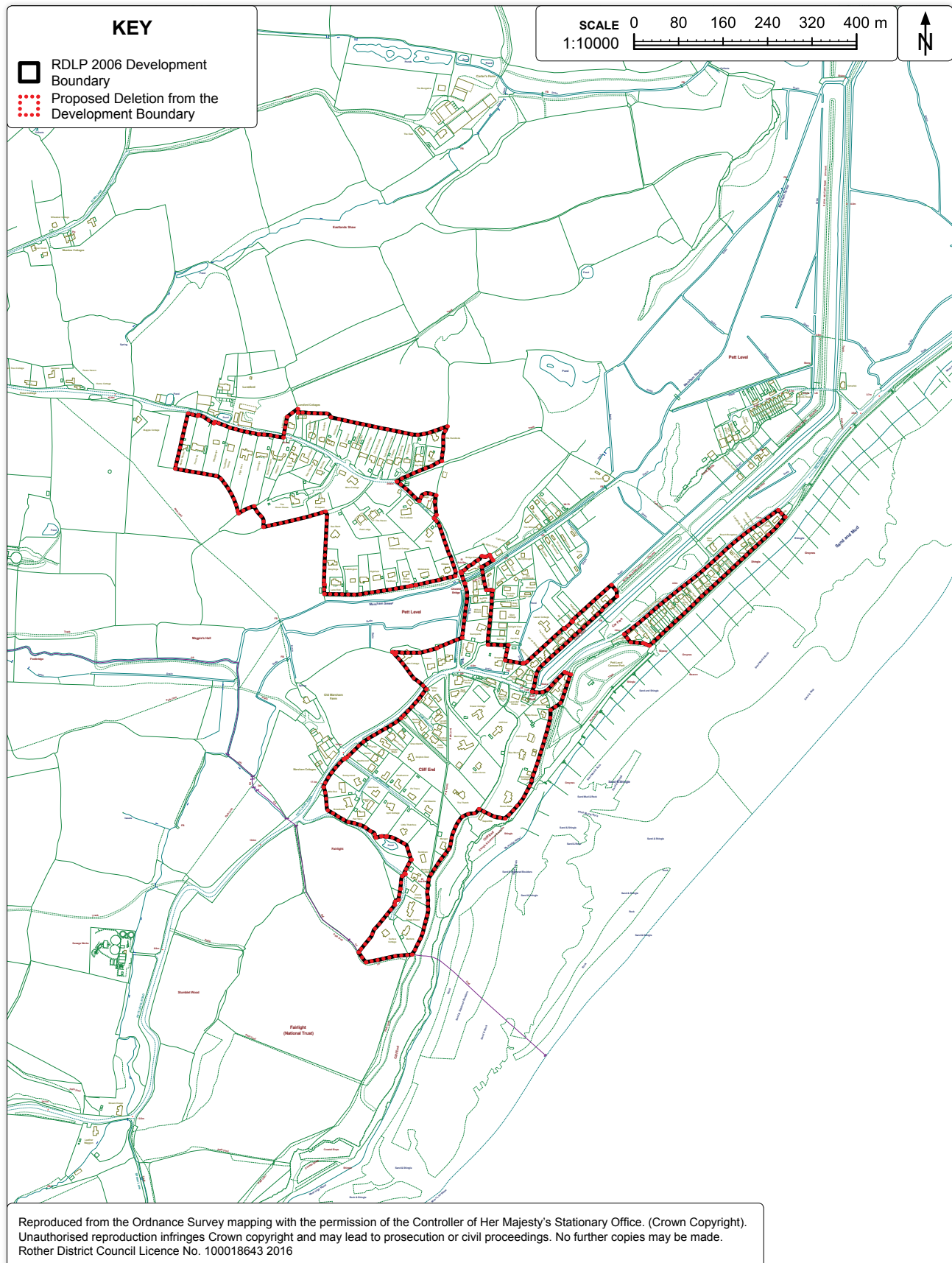
Other Villages with Development Boundaries in the 2006 Local Plan

Figure 130. Pett Development Boundary Map



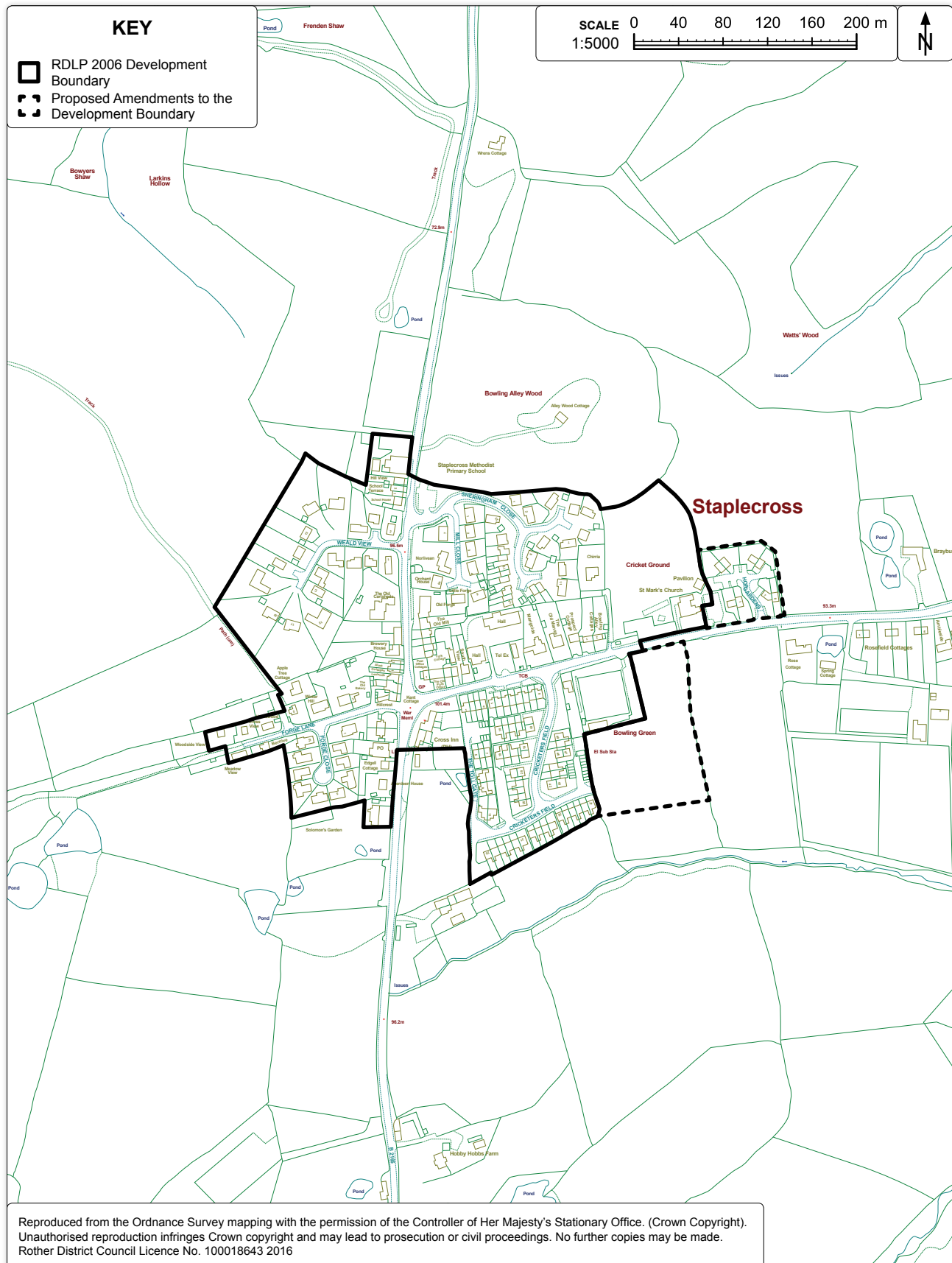
Other Villages with Development Boundaries in the 2006 Local Plan

Figure 131. Pett Level Development Boundary Map



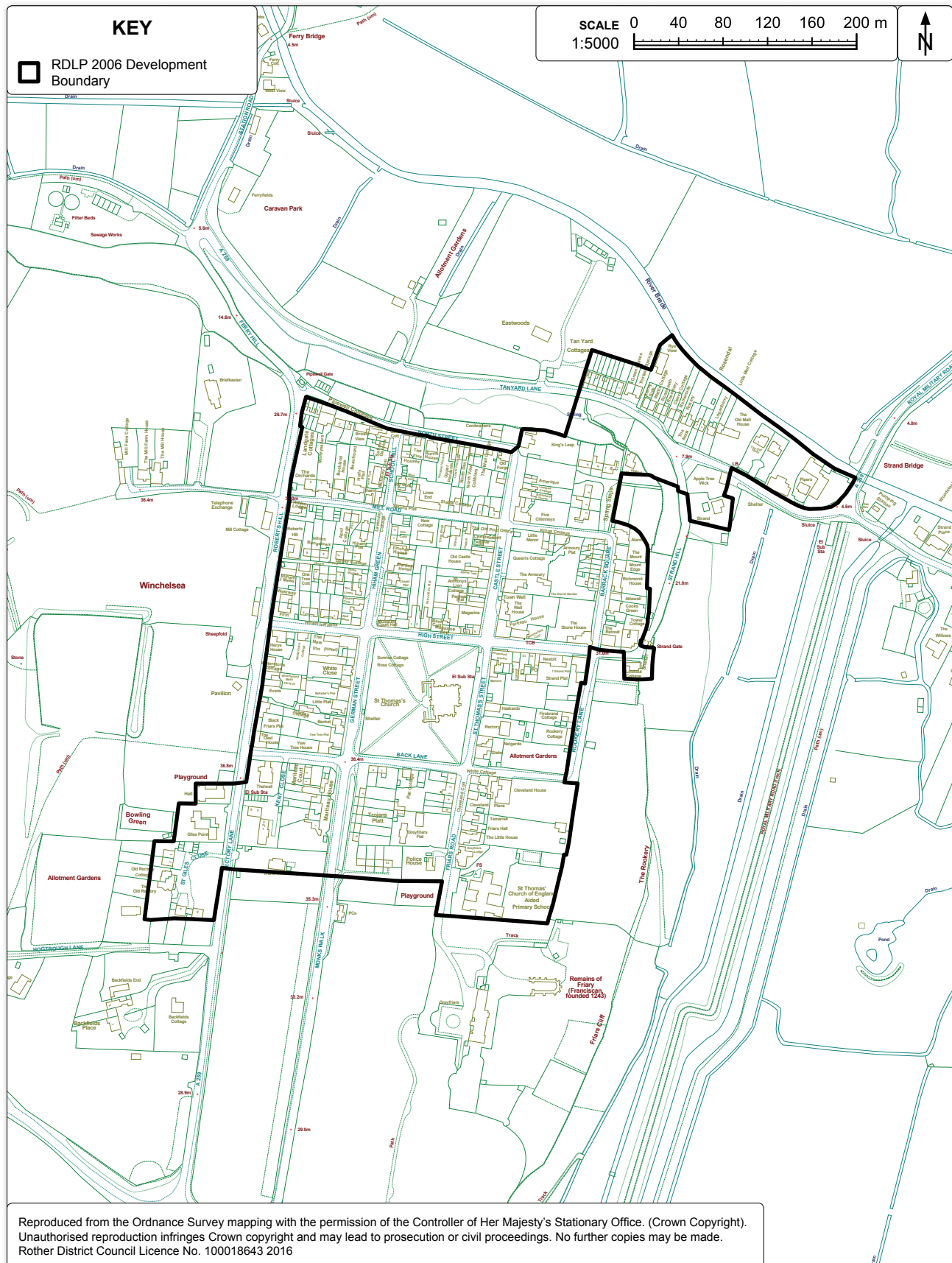
Other Villages with Development Boundaries in the 2006 Local Plan

Figure 132. Staplecross Development Boundary Map



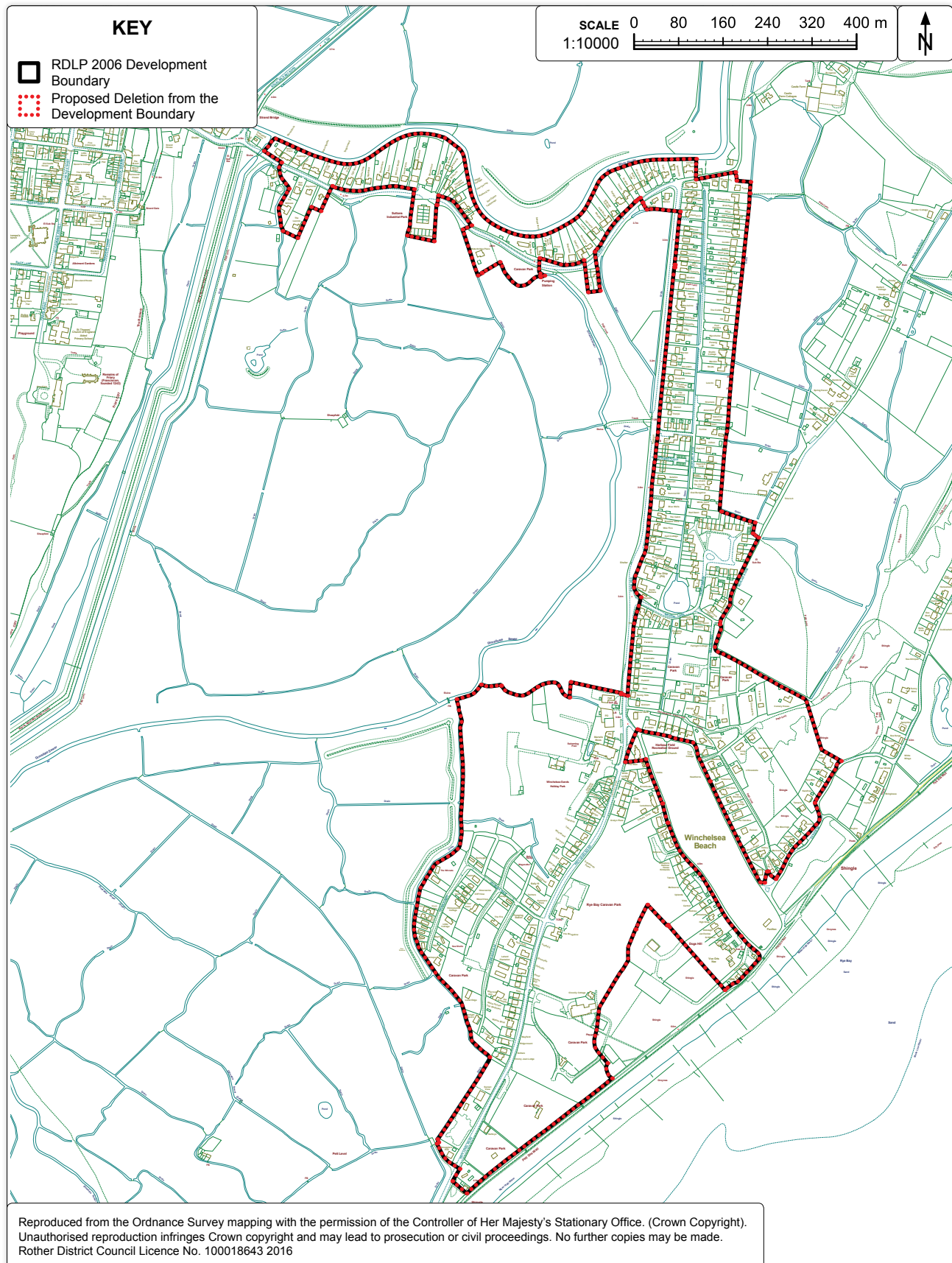
Other Villages with Development Boundaries in the 2006 Local Plan

Figure 134. Winchelsea Development Boundary Map



Other Villages with Development Boundaries in the 2006 Local Plan

Figure 135. Winchelsea Beach Development Boundary Map



17. Other Policies

Gypsies and Travellers

Context

- 17.1. The Government's overarching aim is to ensure fair and equal treatment for travellers in a way that facilitates the traditional and nomadic way of life while respecting the interests of the settled community.
- 17.2. The Government's Planning Policy for Traveller Sites (PPTS) sets out the approach which Local Authorities should follow, firstly determining the level of need within the local area and then planning to meet that need.
- 17.3. The Core Strategy sets out the need for pitches over the plan period (2011-2028) through Policy LHN5 - Sites for the needs of Gypsies and Travellers, which states that:
- "Provision will be made for 5 permanent pitches within Rother for Gypsies and Travellers over the period 2011-2016, and a further 6 pitches between 2016 and 2028.*
- Sites will be allocated in the Development and Site Allocations Plan, taking into account any sites granted permission in the interim.*
- Site selection will take into account the Strategy objectives, the future needs of occupiers and the likely availability of sites for its intended occupiers. Sites should meet the criteria set in Policy LHN6".*
- 17.4. Between 2011- 2016¹, 5 pitches² have been granted permanent planning permission, leaving a remaining requirement of 6 pitches up to 2028³. Just like "bricks and mortar" housing, the Council is required to demonstrate how it will meet the targets for the provision of sites for Gypsies and Travellers. Therefore, sites should be identified through the Development and Site Allocations (DaSA) Local Plan to meet the outstanding requirement over the plan period.

Site Options

- 17.5. The Core Strategy also sets out the policy criteria for site selection through the DaSA and for determining planning applications for Gypsy, Traveller and Travelling Showpeople sites within the District through Policy LHN6:

1 01/04/2011 – 31/03/2016

2 2 pitches at Loose Farm Lane, Battle and 3 pitches at Beeches Brook, Battle. A further pitch has been granted permanent planning permission at Loose Farm Lane after the base date of this document (1st April 2016).

3 There are two sites within the District which currently have temporary planning permission – 1 pitch at Bramble Farm, Ewhurst and 1 pitch at Coldharbour Farm, Dallington

Policy LHN6: Gypsies, Travellers and Travelling Showpeople Criteria

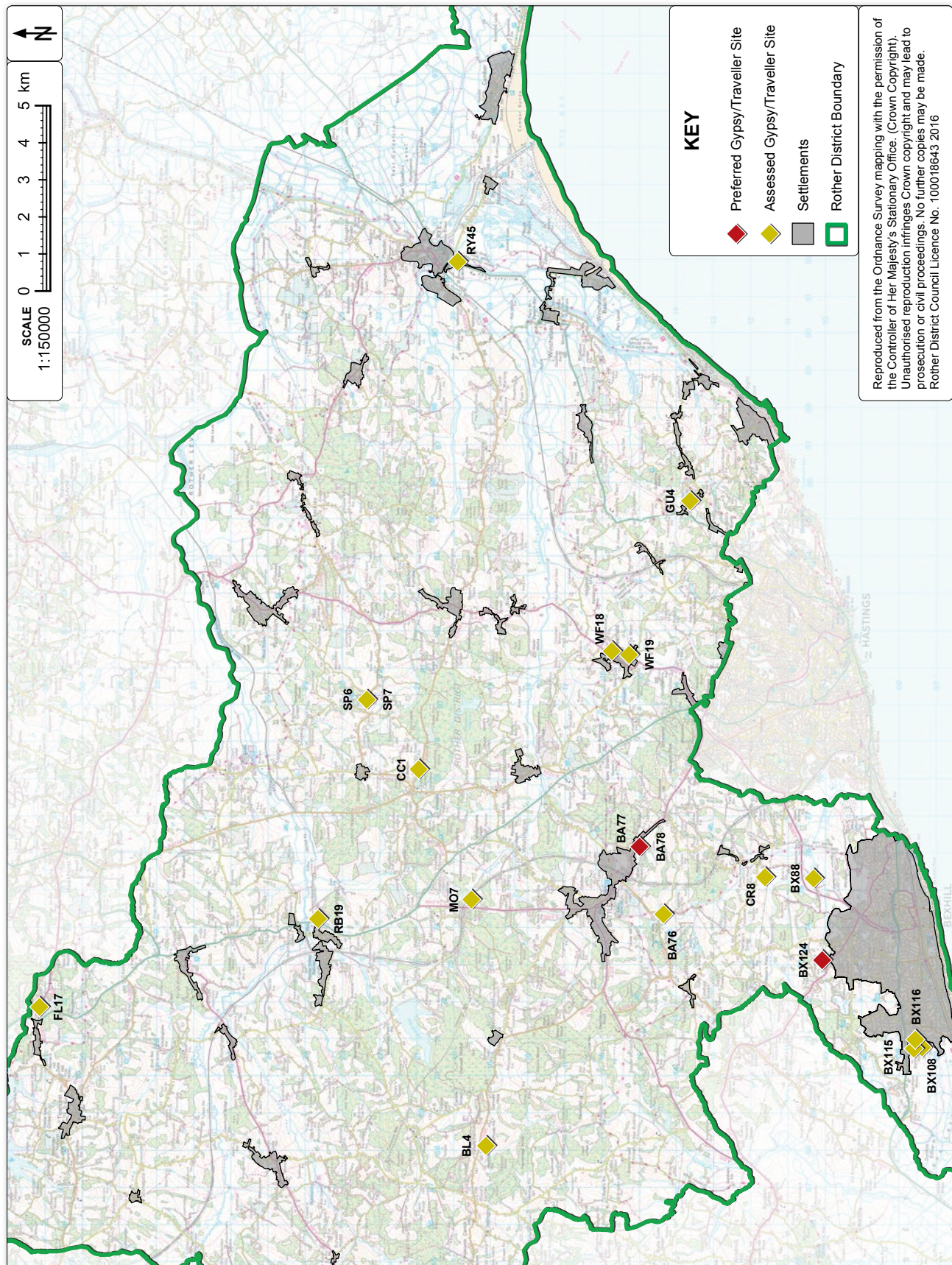
“Site allocations will be made and/or planning permission granted for Gypsy, Traveller and Travelling Showpeople sites, when all of the following criteria are met:

- (i) The site is not located in a nature conservation designated area, in an area at risk from flooding (Flood Zones 3a & 3b or a functional floodplain), in close proximity to a Source Protection Zone or significantly contaminated land;*
- (ii) The site should not result in an unacceptable visual or landscape impact, especially in the High Weald AONB taking account of proposed landscaping or screening;*
- (iii) The site is located within or close to an existing settlement and is accessible to local services by foot, by cycle or by public transport;*
- (iv) The site can be adequately accessed by vehicles towing caravans and provides adequate provision for parking, turning, and access for emergency vehicles;*
- (v) The site is not disproportionate in scale to the existing settlement;*
- (vi) Mixed use sites should not unreasonably harm the amenity of adjoining properties;*
- (vii) In the case of sites for Travelling Showpeople, the site must also be suitable for the storage of large items of mobile equipment;*

Where planning permission is granted, appropriate conditions or planning obligations will be imposed to ensure occupation of the site is restricted to those persons genuinely falling into the definition of Gypsies, Travellers and Travelling Showpeople”.

- 17.6. Evidence from the local Gypsy and Traveller community suggests that families have a preference for small, family plots rather than larger sites housing a number of families.
- 17.7. In terms of bringing sites forward for Gypsy and Traveller pitches through the DaSA, the Council must be able to demonstrate that the pitches are deliverable, i.e. the owner wishes to bring forward the land or is willing to sell the land for the identified purpose. Therefore, the most likely source of sites coming forward for Gypsies and Travellers are from:
 - Sites already owned by a Traveller
 - Publicly-owned sites
 - Willing landowners
 - Part of a comprehensive scheme
- 17.8. Eighteen sites have been considered as reasonable potential options for Gypsy and Traveller sites within the District. The sites considered are spread throughout the District.

Figure 136. Gypsy and Traveller Permanent Site Options Map



Sites considered (as shown in Figure 136):

- (1) BA76: Land north-west of Beeches Brook, Telham Lane, Battle
- (2) BA77: Land adjacent to High Views, Loose Farm Lane, Battle
- (3) BA78: Land off Loose Farm Lane, Battle
- (4) BX88: Actons Farm, Buckholt Lane.
- (5) BX108: Land south east of Cooden Wood
- (6) BX115: Lower Barnhorn Farm and Caravan Park
- (7) BX116: Land off Spindlewood Drive
- (8) BX124: North Bexhill
- (9) BL4: Coldharbour Farm estate, Battle Road, Dallington
- (10) CC1: Cripps Corner highway depot, Cripps Corner
- (11) CR8: Land south of Catsfield Road, Crowhurst
- (12) FL17: Land at Cherry Tree Nursery, The Mount, Flimwell
- (13) GU4: Guestling Green highway depot, Chapel Lane, Guestling Green
- (14) RB19: Land adjacent to Robertsbridge Traveller Site, Redlands Lane, Robertsbridge
- (15) RY45: Chippings Depot, Rye
- (16) SP6: Land north of Bramble Farm, Ewhurst
- (17) SP7: Land to the rear of Bramble Farm, Ewhurst
- (18) WF18: Land to east of Down Edge, Main Road, Westfield
- (19) WF19: Land south west of Moor Lane, Westfield
- (20) MO7: Land adjacent to Mountfield household waste site, Mountfield

17.9. Individual site conclusions can be found in Appendix 3.

17.10. The two preferred sites are:

- (i) BA77: Land adjacent to High Views, Loose Farm Lane, Battle (1 pitch)
- (ii) BX124: North Bexhill strategic allocation (5 pitches)

17.11. Land adjacent to High Views, Loose Farm Lane⁴ is located adjacent to the 2006 Local Plan Development Boundary, to the west of an existing Gypsy and Traveller site which consists of two pitches and is within the High Weald AONB. The site forms part of disused small holding which itself is an area of poor quality despoiled land which adjoins rolling open countryside to the south. The site is in the ownership of a Gypsy/ Traveller household. It has been accepted by a Planning Inspector that the adjacent site is not considered to cause material harm to the existing landscape character of the AONB or compromise the objectives of its designation. The site is also considered to be acceptable in terms of access by vehicles, impact on the local environment and the amenity of residential neighbours and in terms of its proximity to services and relationship and scale with the settled community.

- 17.12. This site and the adjacent two Gypsy/Traveller pitches are considered to be located on the most discrete part of the wider Loose Farm Lane small-holding (BA78) and further pitches in this locality, over and above the additional pitch identified here (BA77) is likely to have an adverse impact on the landscape character of the High Weald AONB.
- 17.13. Provision for five further pitches will be made for in the North Bexhill strategic allocation. The detailed policy can be found in the Bexhill Chapter at Policy BEX3.
- 17.14. It is considered that these sites are preferable over other options within the District. Individual site conclusions can be found in Appendix 3. These preferred sites together yield 6 pitches from a remaining target of 6 of Gypsy and Traveller pitches within the District.

QUESTION 104: Do you agree with the preferred sites for permanent Gypsy and Traveller pitches across the District? If not, which site(s) should be preferred?

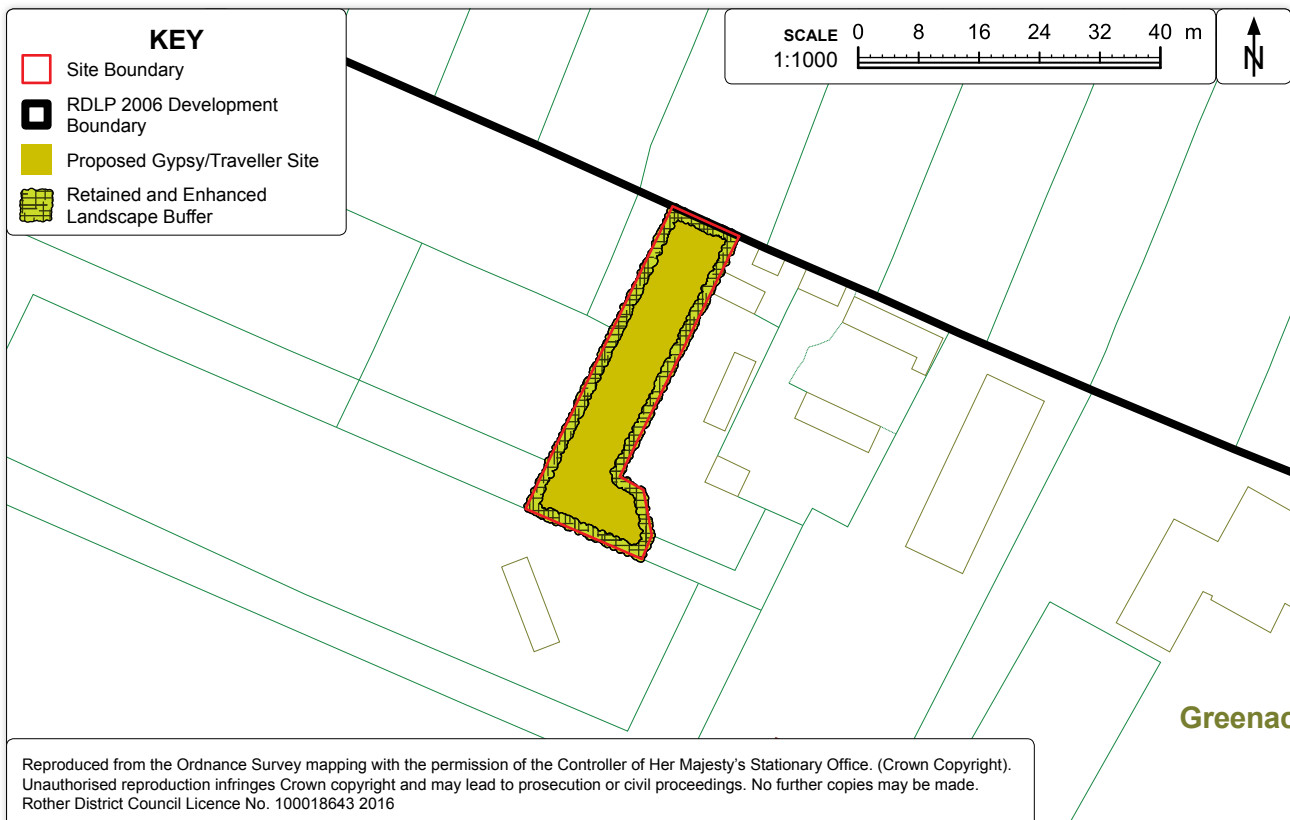
**Preferred Site: Land adjacent to High Views, Loose Farm Lane, Battle
(Ref: BA77)**

Existing use(s)	This site forms part of a larger, currently unused; small-holding which is adjacent to a current gypsy site consisting of 2 pitches which has permanent planning permission.
Size	0.05ha
Key constraints/opportunities	<p>The proposed site is part of a smallholding located on the urban edge of Battle. It is an area of poor quality despoiled land which adjoins residential dwellings in ribbon development to the north and to the south it is rolling open countryside.</p> <p>The site is accessed via a single track off Loose Farm Lane – a narrow lane which connects the small complex of buildings at Loose Farm with the A2100 (Hastings Road).</p> <p>Immediately adjoining to the west are two existing pitches which a Planning Inspector accepted did not result in any material harm to the landscape character of this part of the AONB. The Inspector also concluded that the development only poses a limited risk to highway safety.</p> <p>This site is similarly not prominent when viewed from the adjacent countryside to the south and appears to be well screened by existing fencing, although would benefit from some soft landscaping along the boundary.</p> <p>This area is most acceptable in landscape terms compared to the rest of the wider small-holding. Care should be taken to respect the amenity of adjoining properties on the northern boundary. The site is relatively screened in the wider landscape, although the site would benefit from further native species screening on the southern and western boundaries.</p> <p>The site is considered to be well located in terms of access to services.</p> <p>Given the adjacent Gypsy/Traveller site and the likely negative impact on the AONB as a result of a larger scale of provision of pitches here, it is considered that the area west of the existing pitches is most suitable for one additional pitch.</p>
Proposed use(s)	Site for Gypsies and Travellers.
Developable area	0.05ha
Capacity	1 pitch for Gypsies and Travellers.

Figure 137. BA77 Aerial Map



Figure 138. BA77 Detail Map



Policy GYP1: Land adjacent to High Views, Loose Farm Lane, Battle

Land adjacent to High Views, Loose Farm Lane, Battle as shown on the Policies Map is allocated for one permanent pitch for Gypsies and Travellers. Proposals will be permitted where:

- (i) the applicant has adequately demonstrated that they meet the definition of Gypsies and Travellers in the Government's Planning Policy for Traveller Sites;
- (ii) the scheme proposes no more than one pitch; and
- (iii) the scheme is accompanied with an appropriate native planting scheme to ensure appropriate boundary screening in line with the provisions set out on the Policies Map.

QUESTION 105: Do you agree with the requirements of Policy GYP1, including the boundary as defined on the Policies Map? If not, how would you wish to see it amended?

Preferred Site: Land at North Bexhill (Ref: BX124)

- 17.15. Provision for five further pitches will be made for in the North Bexhill strategic allocation as part of a comprehensive development for the site.
- 17.16. The detailed policy, maps and consultation question/s can be found in the Bexhill Chapter at Policy BEX3.

Existing use(s)	Most agricultural, some woodland, equestrian uses, residential.
Size	c50ha (0.2ha identified for provision for 5 pitches for Gypsies and Travellers).
Key constraints/opportunities	<p>The North Bexhill site, as identified in Figure 23, makes provision for housing, public open space, semi-natural green space and supporting community facilities, together with a small travellers site and access improvements.</p> <p>It is likely that the Gypsy and Traveller site of 5 pitches at the eastern end of the development area east of Watermill Lane. This area is relatively contained in the landscape and would contribute to the outstanding district-wide need for such pitches. The site should be planned in a comprehensive way alongside the other development provisions made within Policy BEX3, to ensure integration with the surrounding development. As well integrated provision of housing and infrastructure, the green infrastructure and mitigation and/or compensation for any biodiversity losses.</p> <p>Further details on the overall site considerations can be found in the Bexhill Chapter.</p>
Proposed use(s)	Housing, public open space, semi-natural green space and supporting community facilities, together with a small travellers site and access improvements.
Developable area	0.2ha
Capacity	5x pitches for Gypsies and Travellers.

Transit¹ site provision

- 17.17. East Sussex County Council owns and manages a transit site for short-term occupation on behalf of all the authorities in East Sussex - a nine pitch transit site with a resident site manager just outside Lewes, called Bridie's Tan. The site is one of only a few in the region, and was completely rebuilt in 2009.
- 17.18. In 2014, the Council worked in partnership with the other local authorities in East Sussex to produce a Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment. The Assessment looked at the need for further Transit provision across the county, evidence showed that although the formal transit provision at Bridie's Tan appears to be in consistent use, there are regular vacancies on the site (pitches on Bridie's Tan, on average, are only occupied 39% of the time). Analysis of unauthorised encampments across the county show that unauthorised sites occur in all local authority areas, which could indicate that the existing site may not be suited to all Gypsies and Travellers who travel through the County.
- 17.19. The Assessment considered "a provisional need for an additional eight transit pitches across the study area.... However, there is a need for all authorities to undertake more robust and consistent monitoring of households stopping on the existing transit provision and on unauthorised encampments in order to be able to more accurately assess future transit requirements". As such, the Local Authorities have revised the monitoring practices of unauthorised encampments to provide consistency of recording and a central point of collection (East Sussex County Council Traveller Team) , therefore being able to more accurately assess future transit requirements across the County. Given the high level of vacancies at Bridie's Tan and the need for more robust monitoring, the need for transit provision is currently under review.
- 17.20. It is considered that at the present time, there is no current unmet short-term need for further transit pitches. However, the Council will continue to work with other Local Authorities across East Sussex to allocate land to meet the county-wide transit needs, particularly through collaborative working using the existing policy framework (Policy LHN6) should a need arise in the future.

QUESTION 106: Is the Council's approach to Transit provision appropriate? If not, how should the Council provide for transit provision in-conjunction with other local authorities in the county?

¹ These are permanent sites that allow Travellers to stay for short periods (up to 12 weeks) when they are passing through an area.

Guestling Green - Land at former highway depot

Context

- 17.21. Guestling Green is a small village located between Hastings and Icklesham and has direct access onto the A259. Guestling Green is rural in character despite the impact of the A259. The village and the surrounding countryside is located within the High Weald AONB. A number of the dwellings in the settlement are listed for their historical interest. It has a limited range of local services, including a primary school, although there is no shop. It is on a local bus route giving access to Rye and Hastings and is around one mile from Three Oaks Station which runs a partial service to Hastings and Rye. Given the limited range of services Guestling Green is not considered a particularly sustainable location for development.

Development Provisions

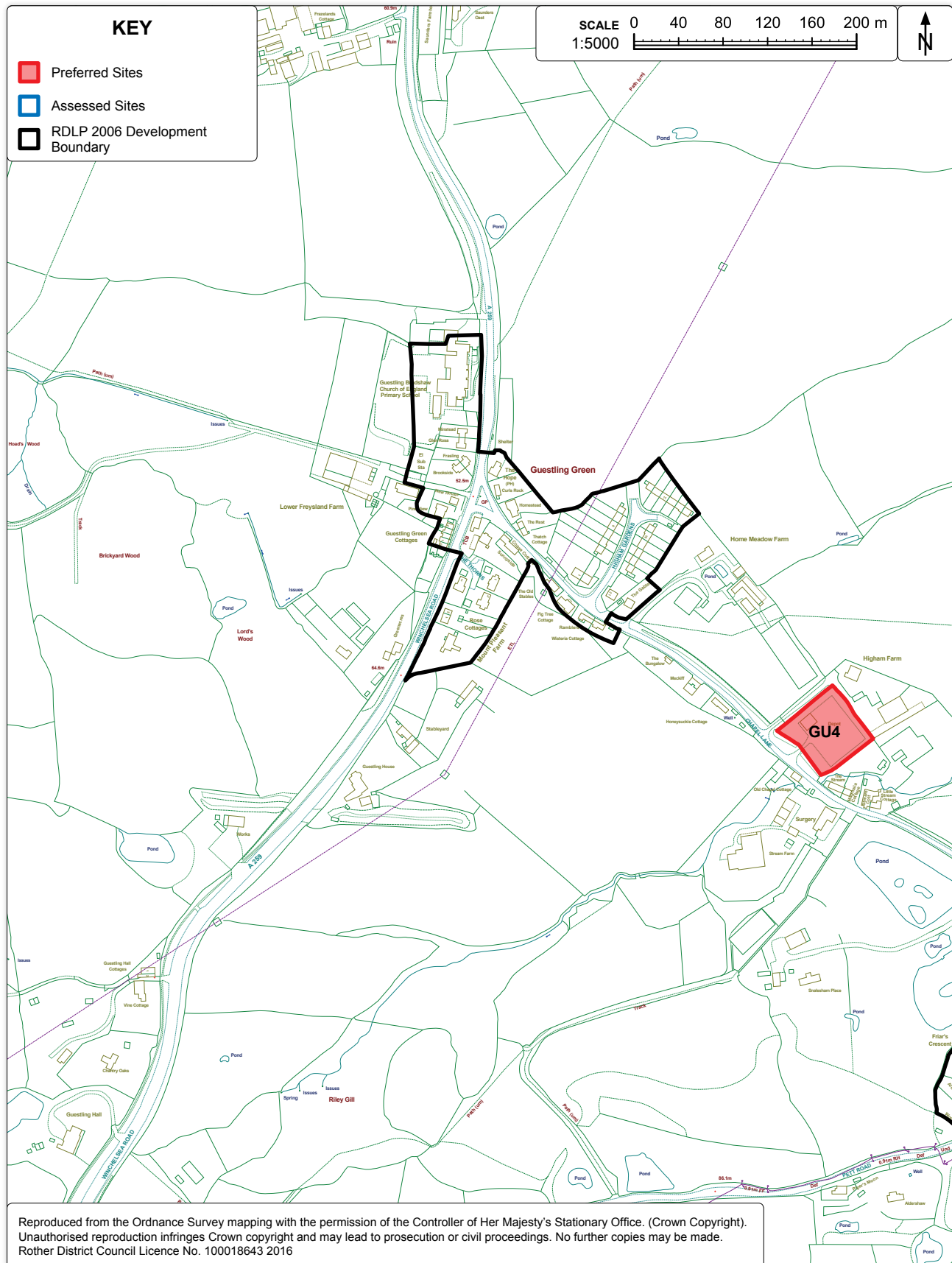
- 17.22. The Core Strategy does not identify any development targets for Guestling Green, given the scale of the village, its setting and limited opportunities for any further development.
- 17.23. Since the Core Strategy was adopted in 2014, the County Council Highways Depot, Chapel Lane has been confirmed as surplus to requirements. This site, although detached from the development boundary of Guestling Green, is located along the ribbon development of Chapel Lane, close to the existing doctor's surgery. Given the Government's focus on prioritising on the re-use of brownfield sites, it is considered that a positive approach is taken for an alternative use on this site.
- 17.24. In the consideration of alternative uses for the depot, Core Strategy Policy EC3 assumes that the site should continue in employment use unless it can be demonstrated that the site is unsuitable. Chapel Lane is narrow and suffers from informal on-street parking, particularly at school drop-off times for people accessing Guestling Bradshaw CE Primary School. This means that larger vehicles often find it difficult to manoeuvre along Chapel Lane, particularly where the Lane meets the A259, therefore it is considered that a continued business use, which would most likely be more intensive than the existing highway depot, is undesirable in this location.

- 17.25. In 2016, the existing doctor's surgery premises at Guestling Green have been identified by the Care Quality Commission as in need of modernisation. In response to this, the surgery has been looking for an alternative site for a relocated and expanded facility within the village. Guestling Green Highway Depot is considered as a suitable site for such a facility. The surgery has also identified the possibility for a 'intermediate care facility' adjacent to the site to provide care for those patients who no longer require hospital care but are unable to immediately care for themselves at home. This approach reduces the need for a stay in a residential care home¹. These proposed uses are considered appropriate for this brownfield site.
- 17.26. Further details of the assessment of individual sites can be found in Appendix 3.

QUESTION 107: Do you agree with the preferred site for development at Guestling Green? If not, which site(s) should be preferred?

¹ Cross reference is made to the 'specialist housing for older people' Chapter which makes specific reference to different types of accommodation needs for older people within the District.

Figure 139. Guestling Green Options Map



Preferred Site: Land at former highway depot, Chapel Lane (Ref: GU4)

Existing use(s)	Highways depot.
Size	0.35ha
Key constraints/opportunities	<p>The site is an existing highways depot owned by East Sussex County Council, but identified as surplus to requirements.</p> <p>This brownfield site is level and well screened from public view by the existing hedging. Although the site is physically separate from the built-up area boundary of the village, it is visually well contained within the ribbon development along Chapel Lane. However, the site would benefit from some additional screening to its eastern boundary (there are some views to the north and east). The site is located within the High Weald AONB.</p> <p>There would be limited impact on neighbouring amenities and the site is located relatively close to an existing bus route on the A259 (although there is no footway along Chapel Lane to the site). Whilst Guestling Green is not identified as a particularly sustainable location for development (the site is not particularly well located for access to many key services) Government policy focuses on the re-use of brownfield sites for alternative uses.</p> <p>There is an existing suitable access point off Chapel Lane.</p> <p>Chapel Lane is narrow and on-street parking, especially at school drop-off and pick-up times, makes it difficult for vehicles to manoeuvre along the road, particularly for larger vehicles.</p>
Proposed use(s)	Doctors surgery and associated complementary medical uses - intermediate care beds (short-term care for people who no longer need to be in hospital but may need extra support to help them recover).
Developable area	0.35ha
Capacity	200sqm doctors surgery plus intermediate care beds (this proposal for the intermediate care beds is subject to confirmation from the relevant health bodies).

Figure 140. GU4 Aerial Map



Figure 141. GU4 Detail Map



Policy GUE1: Land at former highway depot, Guestling Green

Land at Guestling Green Depot, Guestling Green, as shown on the Policies Map, is allocated for a doctor's surgery and an intermediate care beds facility. Proposals will be permitted where:

- (i) a doctors surgery of around 200sqm is provided;
- (ii) a small scale intermediate care beds facility is provided;
- (iii) adequate on-site parking is provided; and
- (iv) provision is made for the retention and enhancement of boundary planting on the site.

QUESTION 108: Do you agree with the requirements of Policy GUE1? If not, how would you wish to see it amended?

Marley Lane - Land at Felon's Field

- 17.27. This site on the south side of Marley Lane adjoins the highways depot site near the junction with the A21. It was allocated in the 2006 Local Plan under Policy EM5 for industrial/storage purposes. Planning permission was granted in 2014 for a highways depot but it is understood that this will not be implemented. In view of this, further consideration has been given to the merits of reallocating the site.

Preferred Site: Land at Felon's Field, Marley Lane

Existing use(s)	Brownfield site (overgrown hardstanding with surrounding woodland)
Size	2.27ha
Key constraints/opportunities	<p>Any development would need to respect the number of constraints impinging on the site. Not only is it within the High Weald AONB, but is fringed by Semi-Natural Ancient Woodland and tree belts on the site are subject to a Tree Preservation Order. A buffer between development and the TPO trees would be appropriate. Part of the site lies within a ground water source protection zone. Ecology work in connection with a recent planning application (RR/2014/473/C) identified dormice on site, and a mitigation strategy.</p> <p>Whilst the site is poorly sited in terms of public transport and is not accessible by walking, this site still represents a very rare opportunity for uses that would benefit from good access to the adjacent A21. A Travel Plan would be an appropriate means of minimising traffic generation. The A21 junction has been improved since the earlier allocation; hence, this need no longer be a requirement.</p> <p>Therefore, subject to strict controls to ensure that the environmental constraints, including its habitat value, are fully and sensitively addressed, it is still regarded as an acceptable site for industrial/warehousing purposes, especially for distribution-oriented uses.</p>
Proposed use(s)	Industry/warehousing
Developable area	1.02ha
Capacity	3000sqm

Other Policies

Marley Lane

Figure 142. Marley Lane Aerial Map

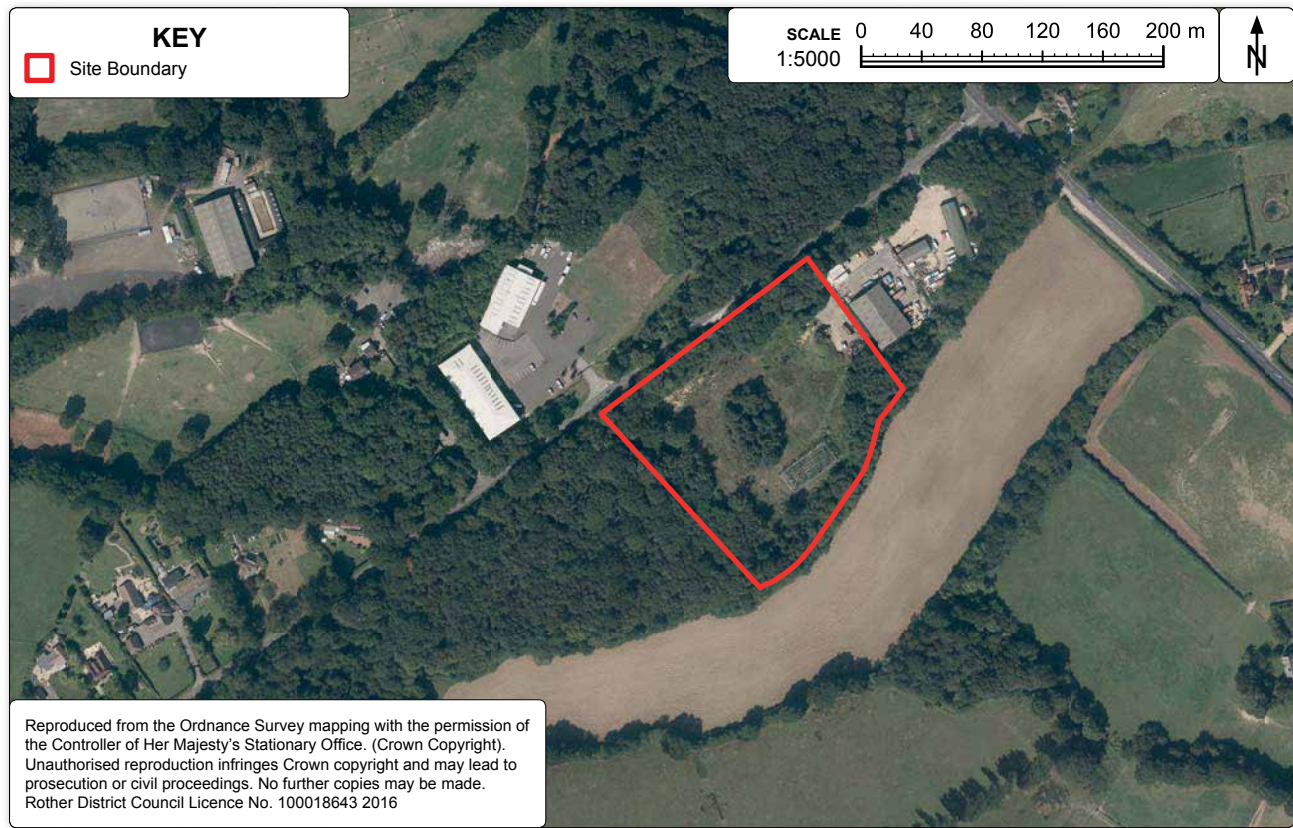


Figure 143. Marley Lane Detail Map



Policy MAR1: Land at Felon's Field, Marley Lane

Land at Felon's Field, Marley Lane, as shown on the Policies Map, is allocated for industrial/storage purposes. Development proposals should:

- (i) provide for the retention and strengthening of boundary tree belts, new woodland planting to the south and west and its subsequent management;
- (ii) be subject to an ecological survey;
- (iii) ensure that it does not prejudice ground water;
- (iv) minimises the risk of increased flooding due to surface water run-off; and
- (v) be accompanied by travel plan to show how the traffic to be generated is to be minimised.

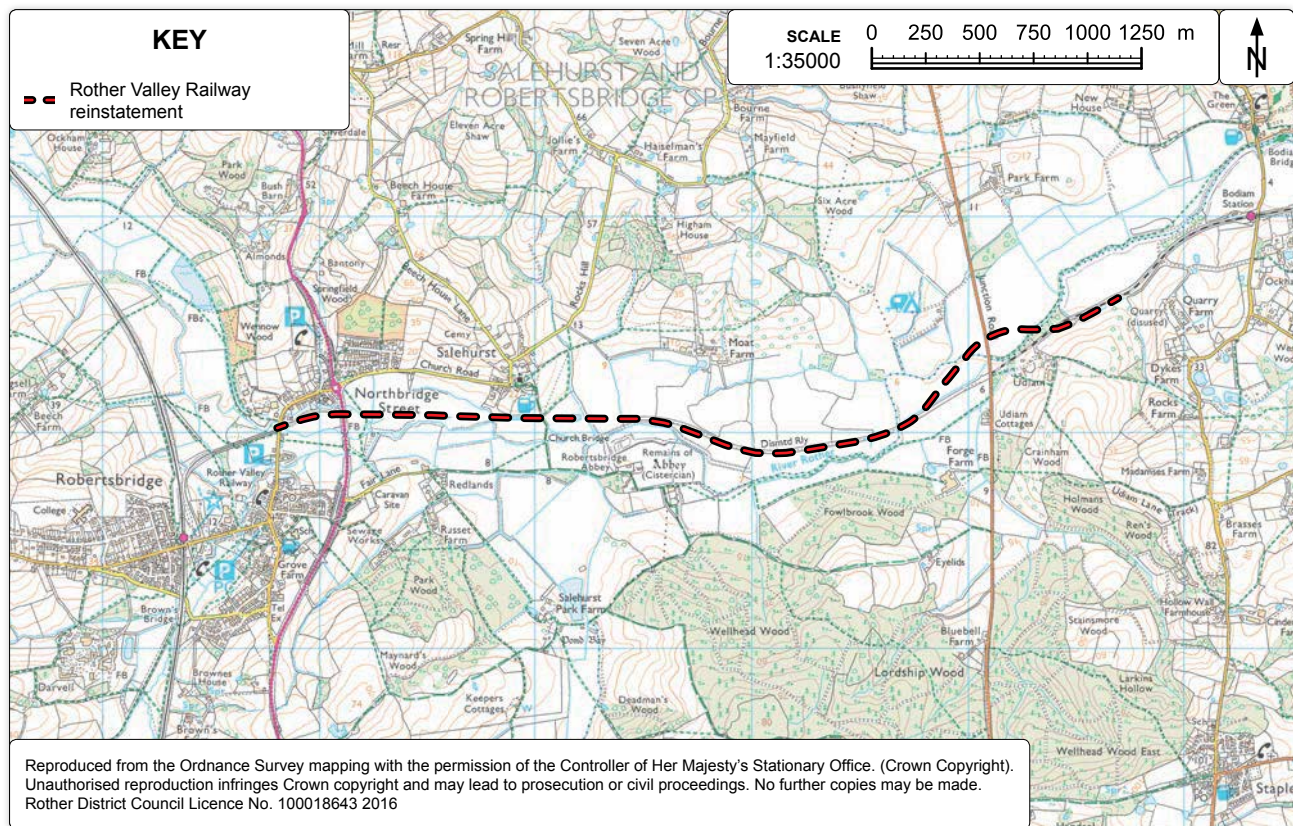
QUESTION 109: Do you agree with the requirements of Policy (MAR1)? If not, how would you wish to see it amended?

Rother Valley Railway

Context

- 17.28. Saved Policy EM8 of the Rother District Local Plan 2006 provides for an extension of the Kent & East Sussex Railway westwards from Bodiam to Robertsbridge. The safeguarded route follows the original track of the railway.
- 17.29. Since 2006 planning permission has been granted to the Rother Valley Railway Ltd to redevelop facilities and buildings alongside Robertsbridge Station which also included a track connection to the main line itself and the reinstatement of the track from the station as far as Northbridge Street. The track work is now substantially in place and other works are on-going. In addition, a separate planning application was submitted in 2014 by the Rother Valley Railway for the continuation of the track bed across Northbridge Street and onward to Bodiam.
- 17.30. The tourism advantages of reinstating the former route continue to be recognised, which are seen as building on the success of the Kent & East Sussex Railway from Tenterden as far as Bodiam as well as giving the opportunity to provide a connection to the main line rail services at Robertsbridge. At the same time, the line of the route along the high quality and distinctive landscape of the Lower Rother Valley, which is part of the attraction of the railway route, requires that this character and its tranquil nature is maintained.
- 17.31. The current application by the Rother Valley Railway is yet to be determined, but it has sought to address the major issues acknowledged in the 2006 Plan, including crossing Northbridge Street, the A21 Robertsbridge Bypass and the B2244 Junction Road at Udiam, as well as environmental issues and flood risk, particular in respect of the flood defences at Robertsbridge. In this respect, there has been considerable negotiation with Highways England, the County Highway Authority and the Environment Agency. The large majority of the former track bed beyond Robertsbridge remains, however, in private ownership.
- 17.32. Given that the current planning application remains to be determined, a further policy is required in this Plan, if the proposal is still deemed appropriate.

Figure 144. Rother Valley Railway Map



Policy options:

The options are:

Option A: to roll forward Policy EM8 in a similar form but acknowledging that the responsibility for the work is now in the name of the Rother Valley Railway with the line seen as extending from Robertsbridge to Bodiam, or

Option B: to cease to show any positive commitment to the scheme.

In light of the on-going work at Robertsbridge Station in implementing a planning permission granted since 2006 and the advanced state of the 2014 planning application (which has included significant technical work in relation to the highway crossings, environmental issues and flood risk matters) and the significant commitment of the Rother Valley Railway to pursue the scheme, the proposal is that a positive policy is retained.

Policy RVR1: Rother Valley Railway

The proposal to re-instate the former railway line from Robertsbridge to Bodiam along the route identified on the Policies Map, will be supported, subject to a proposal meeting the following criteria:

- (i) it does not compromise the integrity of the floodplain and the flood protection measures at Robertsbridge;
- (ii) it has an acceptable impact on the High Weald Area of Outstanding Natural Beauty; and
- (iii) it incorporates appropriate arrangements for crossing the A21(T) Robertsbridge bypass, the B2244 at Udiam, Northbridge Street and the River Rother.

QUESTION 110: Do you agree with a policy to support the continued allocation for the re-instatement of the railway link from Robertsbridge to Bodiam along its original route?

And finally...

QUESTION 111: Do you have any comments on this scope or content of the new Local Plan that are not covered by other questions?

Appendices

18. **Appendix 1**

Core Strategy policies

19. **Appendix 2**

Superseded Local Plan 2006 policies

20. **Appendix 3**

Assessed sites - Options

- Bexhill
- Hastings Fringes
- Beckley Four Oaks
- Broad Oak
- Camber
- Catsfield
- Guestling Green
- Hurst Green
- Iden
- Northiam
- Peasmarsh
- Rye Harbour
- Westfield
- Gypsies and Travellers
- Marley Lane

21. **Appendix 4**

Glossary of Terms

18. Appendix 1

Core Strategy Policies

18.1. Overall Spatial strategy

OSS1	Overall Spatial Development Strategy
OSS2	Use of Development Boundaries
OSS3	Location of Development
OSS4	General Development Considerations

18.2. Bexhill

BX1	Overall Strategy for Bexhill
BX2	Bexhill Town Centre
BX3	Development Strategy

18.3. Hastings Fringes

HF1	The Hastings Fringes
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18.4. Rye and Rye Harbour

RY1	Policy Framework for Rye and Rye Harbour
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18.5. Battle

BA1	Policy Framework for Battle
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18.6. Rural Areas

RA1	Villages
RA2	General Strategy for the Countryside
RA3	Development in the Countryside
RA4	Traditional Historic Farm Buildings

18.7. Sustainable Resource Management

SRM1	Towards a Low Carbon Future
SRM2	Water Supply and Wastewater Management

18.8. Communities

CO1	Community Facilities and Services
CO2	Provision and Improvement of Healthcare Facilities
CO3	Improving Sports and Recreation Provision
CO4	Supporting Young People
CO5	Supporting Older People
CO6	Community Safety

18.9. Local Housing Needs

LHN1	Achieving Mixed and Balanced Communities
LHN2	Affordable Housing
LHN3	Rural Exception Sites
LHN4	Sites for Wholly or Substantially Affordable Housing
LHN5	Sites for the needs of Gypsies and Travellers
LHN6	Gypsies, Travellers and Travelling Showpeople Criteria

18.10. Economy

EC1	Fostering Economic Activity and Growth
EC2	Business Land and Premises
EC3	Existing Employment Sites
EC4	Business Activities Elsewhere Within the District
EC5	Support for key Sectors
EC6	Tourism Activities and Facilities
EC7	Retail Development

18.11. Environment

EN1	Landscape Stewardship
EN2	Stewardship of the Historic Built Environment
EN3	Design Quality
EN4	Management of the Public Realm
EN5	Biodiversity and Green Space
EN6	Flood Risk Management
EN7	Flood Risk and Development

18.12. Transport and Accessibility

TR1	Management and Investment in Strategic Accessibility
TR2	Integrated Transport
TR3	Access and New Development
TR4	Car Parking

18.13. Implementation and Monitoring Framework

IM1	Monitoring Framework
IM2	Implementation and Infrastructure
IM3	Phasing of Development

19. Appendix 2

Superseded Local Plan 2006 policies

19.1. Development Strategy

- DS3 Proposals within development boundaries
- DS5 Strategic Gaps
- DS6 Managing housing land release

19.2. Housing Developments

- HG5 Residential mobile homes
- HG7 Retention of existing housing stock
- HG8 Extensions and alterations to existing dwellings
- HG9 Extensions to residential curtilages

19.3. Community Facilities

- CF4 Provision of play areas
- CF5 Equestrian development
- CF6 Provision of public art

19.4. Transport Developments

- TR1 Bexhill-Hastings link road area of search

19.5. Employment Developments

- EM4 Marley Lane – land at Rutherfords Business Park
- EM5 Marley Lane – land adjacent to DB Earthmoving
- EM8 Extension of steam railway from Bodiam to Robertsbridge
- EM10 Chalet, caravan and camping accommodation
- EM12 Winter storage of caravans
- EM13 Shopping and related commercial development in town/district centres

19.6. Bexhill

- BX2 Land north of Pebsham
- BX3 Land north of Sidley
- BX4 Countryside Park
- BX5 Town centre shopping area
- BX6 Town centre development area
- BX7 Town centre office areas
- BX8 Former Galley Hill depot, Ashdown Road
- BX9 High School and Drill Halls, Down Road
- BX10 Cemetery extension

19.7. Rye and Rye Harbour

- RY7 Rye Harbour Road Employment Area
- RY8 Land adjacent to Stonework Cottages, Rye Harbour

Appendix 2

Superseded Local Plan 2006 policies

19.8. Villages

VL6	Land east of the Village Hall at Northiam
VL9	Land off Moor Lane, Westfield
VL10	Extension to Wheel Farm Business Park
VL11	Land at Westfield Down, Westfield
VL12	Victoria Way and land south of Harbour Farm, Winchelsea Beach

19.9. Hastings Fringes

HF1	Land off Burgess Road
HF2	Land off Woodlands Way

20. Appendix 3

Assessed Sites - Options

20.1. Bexhill

Site ID	BX1
Site Name	Sainsburys/ Station Road/Western Road
Site Assessment	
<p>This broad location lies within an area identified within the Core Strategy as an area of potential town centre expansion, given the level of retail growth potential identified for Bexhill through Policy BX2. This area was first identified through the Local Plan (2006) as an area for a mixed use, retail-led redevelopment on the existing Sainsburys site and related redevelopment along Western Road (Local Plan Policy BX6). However this site has not come forward over the Plan period.</p> <p>There has been no recent market interest regarding this site and evidence indicates that redevelopment of this area is unlikely to be viable. There are a large number of existing retail units which are well occupied, meaning assimilation of land to bring the site forward is problematic given the large number of landowners. Therefore it is not possible to consider the site as available for development. Therefore it is not appropriate to roll this allocation forward into the new Local Plan.</p>	
Recommendations	Not a preferred site.

Site ID	BX4
Site Name	Former High School Site and Drill Hall, Down Road
Site Assessment	
<p>This site is identified for mixed use in the Rother District Council Local Plan (2006) for offices, community buildings and high density housing. The site (as identified within the Local Plan (2006)) is no longer as large as previously identified, due to the recent construction of the Skills Centre on the east of the site, with land to the north for a possible extension in due course. The King Offa Primary School playing field situated on the western part of the site and no longer forms part of the development area. The existing leisure centre is situated to the south of the site along with the Drill Hall.</p> <p>The site is located in a prominent position directly adjacent to the junction of the recently completed Link Road, (Combe Valley Way) and the A259, and allows for the opportunity to create a landmark destination for leisure facilities.</p> <p>There is a need for a comprehensive consideration of the site to ensure a high quality public realm at this highly prominent gateway site into the town. There are aspirations for a combined wet and dry sports and leisure facility on one site along with other complementary facilities (restaurants/hotel) to create a leisure destination, along with a modest number of dwellings (circa 30) on the northern part of the site, closest to the existing housing. The existing Drill Hall would require relocation as part of the redevelopment. Car/ coach parking for the school lost as part of the sites redevelopment would need to be re-provided.</p> <p>The development should focus on an accessible, sustainable and high quality leisure hub facility, through the creation of a landmark leisure destination through the creation of high quality buildings and public realm on this highly prominent gateway site into the town.</p>	
Recommendations	Preferred site (mixed use - wet/dry leisure facility, residential, hotel, restaurants, plus car/coach parking for adjacent school).

Appendix 3

Assessed Sites - Options

Site ID	BX5
Site Name	Knole Road, Bexhill
Site Assessment	
<p>The site is located within the development boundary of Bexhill. The site is surrounded on three sides by residential properties whilst there is a substantial Grade II listed terrace of late-Victorian dwellings in De La Warr Parade on the south side of Knole Road. The site is east of the Bexhill Town Centre Conservation Area and visually forms part of the setting of the listed terrace to the south known as De La Warr Parade.</p> <p>The site is currently used as an outdoor bowls facility consisting of two outdoor greens (one is disused) with an additional indoor rink, along with other associated facilities. The existing bowls club buildings run along the length of the western boundary and are in poor condition.</p> <p>The site is well related to the town centre and other associated services such as doctors. There are also nearby bus services connecting to the town and wider transport network within walking distance. The train station is also within a reasonable walking distance.</p> <p>A recent planning appeal was dismissed on design grounds for 41 sheltered apartments on the frontage of the site, including new bowls facilities. However, the principle of development of the frontage was accepted by the appeal inspector (paragraph 21 of the appeal decision - APP/U1430/A/06/2030466). Therefore, the frontage of the site is considered suitable for development subject to an appropriate high quality design which respects the character and setting of the adjoining listed buildings, in line with Policies OSS5, EN2 and EN3. Any development should retain and improve existing bowling green facilities in line with Policies CO1 and CO3.</p>	
Recommendations	Preferred site (mixed use - residential and improved bowling green and associated facilities).

Site ID	BX8
Site Name	Land to the west of Ellerslie Lane
Site Assessment	
<p>The site forms part of rolling open countryside which in part abuts Highwoods Golf Course. The site is higher in the north and has views into the wider landscape. The southern and eastern ends of the site are lower. Development of any scale at this location would constitute as a significant incursion into existing open countryside, contrary to OSS4.</p> <p>There is an existing access for the fields from Fryatts Way, however, a large development in this location is likely to have a significant impact on the adjacent quiet residential road network, contrary to Policy TR3.</p>	
Recommendations	Not a preferred site.

Site ID	BX10
Site Name	Recycling Centre and Car Park Little Common
Site Assessment	
<p>The loss of car parking and recycling facilities would be a clear concern to Little Common District Centre. The existing access is narrow with limited scope for widening, there are existing pinch points, and in places there is only space for single lane traffic. Therefore it is unlikely that a suitable access could be created, contrary to Policy TR3.</p>	

There is also potential noise pollution from the existing adjacent electricity sub-station which would likely an amenity issues for any potential housing development. A housing development could impact on the amenity of adjoining residential properties, particularly given the limited size of the site and the single storey properties to the north. The site is therefore contrary Core Strategy Policies OSS3, OSS4, and TR3. The site is well used as a car park/recycling facility and as such this site is not considered suitable for consideration as a housing site.

Recommendations	Not a preferred site.
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Site ID	BX12
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Site Name	3 London Road and rear of 1 London Road, Bexhill
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Site Assessment

The site is currently used as the existing car park and pub garden for the pub. The site is centrally located and is close to local services. However, any development of this site would result in the loss of parking/loading/unloading for the pub. Whilst any infill development would generate residential related parking which it is unlikely that this could be provided for satisfactorily. As such the proposal is contrary to Policies OSS1, OSS4 (ii), EN3 and TR3 of the adopted Core Strategy. Furthermore, the landowner has not indicated that they wish to pursue a development here, as such it is not considered that the site is developable at this time.

Recommendations	Not a preferred site.
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Site ID	BX14
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Site Name	Bexhill Post Office, Endwell Road
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Site Assessment

The site is still in current use and is a prime town centre site. This area is key to Bexhill Town Centre regeneration, but is considered most suitable for retail/A3 on the ground floor with offices above, but could only be achieved by the relocation of the Post Office counter to another town centre location. However, the landowner has not indicated that they are wishing to relocate in the short to medium-term, therefore it is not considered that this site is deliverable.

Recommendations	Not a preferred site.
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Site ID	BX19
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Site Name	Land at Preston Hall Farm, Bexhill
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Site Assessment

The site was identified within the Rother District Local Plan (2006) as part of a major urban extension covering some 100 hectares of land north-east of Bexhill. The site is bounded by existing residential properties to the west, Redgrove Wood, which is designated as Ancient Woodland, and adjoining hedgerow to the north-west, a private lane (also a public footpath in part) to the Grade II Listed Preston Hall and Preston Hall Cottage to the north-east and a strong hedgerow to the east.

The site relates more to the adjacent housing off Watermill Lane rather than the countryside to the north. Linkages with facilities and services in Sidley as well as the countryside are vital.

Access may be gained in Watergate, but provision would need to be made for any displaced parking. The traffic implications of development may also have an impact on the A269/Holliers Hill /A2036 Wrestwood Road/ London Road junctions and would need to be carefully considered.

Recommendations	Preferred site (residential).
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Appendix 3

Assessed Sites - Options

Site ID	BX23
Site Name	Sidley Car Park, Ninfield Road
Site Assessment	<p>The site is an existing car parking close to the Sidley District Centre. Although the car park is underutilised, the acceptability of a loss of car parking is a clear issue. The site is surrounded on all sides by existing housing, with some retail floorspace on the ground floor at the northern boundary. It is likely that there will be some residential amenity issues in bringing forward residential development given the close proximity to the existing dwellings and likely potential for overlooking, therefore identifying a potential conflict with Policy OSS4 (ii). There are two trees on the south east boundary which are considered good specimens and may be worthy of preserving. Any potential development would need to bring access benefits with the junction/access to Ninfield Road in line with Policy TR3. There is no indication that the site owner wishes to bring forward the site for development, therefore the site cannot be defined as suitable or developable at this time.</p>
Recommendations	Not a preferred site.

Site ID	BX24
Site Name	Land at Worsham Farm
Site Assessment	<p>This area is located north of the area identified within the Rother Local Plan (2006) and the north-east Bexhill SPD for housing and employment development. The site is almost wholly located within the Combe Valley Countryside Park and is outside the Bexhill development boundary.</p> <p>The site forms part of undulating countryside which for the most part affords far-reaching views beyond Worsham Lane and an established tree belt provides a defensible urban edge. Any development in this location would have a detrimental impact on the landscape and as such is considered contrary to Policy OSS5 and EN1.</p>
Recommendations	Not a preferred site.

Site ID	BX25
Site Name	Woodsgate Place, Gunters Lane
Site Assessment	<p>This brownfield site is in existing private educational use, although the landowner advises that this use may cease in the short-medium term. The site is located within the existing development boundary. There are a number of large trees on the boundaries of the site and these are covered by an area Tree Preservation Order. As such, this is likely to affect the developable area of the site by about half, leaving around 0.5ha. The site is surrounded by housing on all four sides. The site is reasonably located with regards to access to services, in line with Policy OSS4 and TR3. There is an existing access from Gunters Lane as well as potential for an alternative access from Gatelands Drive. However, the loss of a private education provision (existing nursery and preparatory school facility) would be contrary to Policy CO1 which resists the use of community facilities and services. As such, it is considered that this site is better suited to the nursery school facility in line with the provisions of Policy CO1.</p>
Recommendations	Not a preferred site.

Site ID	BX30
Site Name	Cemetery Lodge Field/276 Turkey Road
Site Assessment	
<p>This greenfield site is located within the existing development boundary for Bexhill (Policy OSS2). There are three residential properties at south-eastern corner of the site, with a further residential property along western boundary. Bexhill Cemetery is to the north.</p> <p>The site is partially contained from wider views by the boundary trees but there are more localised views due to the types of trees on the perimeter. There is an existing Tree Preservation Order (No.312) along western and southern boundaries.</p> <p>The site is relatively well located in terms of access to some services (schools) and is close to existing bus routes, although there aren't any footpaths immediately adjacent to the site (there are some on the opposite side of the road).</p> <p>There is no existing access point for the site, but the most likely access point is at the south-west corner of the site onto Turkey Road (in the same ownership). The site could also provide a new access point to the adjacent Cemetery Lodge. Highway improvements are likely to be required to make the development acceptable.</p> <p>The site received planning permission subject to a legal agreement in 2003 but the decision notice cannot be issued as the originally company who put in the planning application no longer exists.</p>	
Recommendations	Preferred site (residential).

Site ID	BX33
Site Name	St Mark's Church Car Park, Little Common Road
Site Assessment	
<p>The site is an existing church car park and is currently in use. The church hall building has recently had additional extensions and therefore given the pressure on parking in this area, the car park is a valuable resource for the church hall, particularly as there appears to be little alternative in the way of on-street parking in the vicinity.</p> <p>Loss of car parking to this community facility would be concern and would potentially conflict with Policy OSS4 and TR3. There is no indication from the landowner that they wish to pursue a residential development at this location.</p>	
Recommendations	Not a preferred site.

Site ID	BX36
Site Name	Land adjacent to Conifers, Little Common Road
Site Assessment	
<p>The site is uneven, sloping down to north and west. Although the site is screened by trees to the north-east, the site is prominent on the ridge, with clear views to the north. In-depth development would be inappropriate given the prominence in the landscape.</p> <p>Development of this site would compromise an important urban greenspace in Bexhill (White Hill Natural and Semi-Natural Greenspace). A viable access is unlikely to be achieved from the A259 and therefore it would be difficult to achieve an appropriate access point (would also need third party land). Any development at this location would be contrary to Core Strategy Policies OSS2, OSS3, OSS4 and TR3.</p>	
Recommendations	Not a preferred site.

Appendix 3

Assessed Sites - Options

Site ID	BX47
Site Name	Land at Fantails, Sandhurst Lane
Site Assessment	<p>This site was originally identified as part of the broad location at West Bexhill, and is an existing paddock to the east of Fantails in Sandhurst Lane. The site is to the west of the Barnhorn Green application site, and is specifically adjacent to the employment element of the proposed scheme. The site is not suitable for development in isolation. Given the proximity of the site to the proposed employment land, this site is considered potentially suitable as additional employment (B1) floorspace in tandem with the approved scheme to meet the needs identified in Policies BX3 (iii) and EC2 (iii), although there is no indication from the site promoters that they would wish to bring forward the land for employment use.</p> <p>A safe access would not be possible from Sandhurst Lane, particularly as any potential access would be near the bend in this narrow country road and intensification of the use of Sandhurst Lane or the access to Fantails is not appropriate.</p>
Recommendations	Not a preferred site.

Site ID	BX48
Site Name	Land at Gotham Farm, Sandhurst Lane
Site Assessment	<p>This site forms part of the previously identified broad location north of Barnhorn Road. This remote area of countryside is formed of mainly exposed ground which is better related to the countryside to the north rather than the adjacent site (extant planning permission for Barnhorn Green – 275 dwellings). Access from Sandhurst Lane is not appropriate and over half the site is located in Flood Zone 3. It is considered that there is little potential to mitigate the impact of development at this location. Therefore the site is not considered suitable for development as it would be contrary to Policies OSS3, OSS4 and EN1.</p>
Recommendations	Not a preferred site.

Site ID	BX49
Site Name	Land east of Spring Lane, Bexhill
Site Assessment	<p>This site forms part of the previously identified broad location north of Barnhorn Road. This site is the subject of an existing outline planning application for a <i>'Mixed-use development comprising 275 dwellings, up to 3,500 sqm of employment floor space, a nursing home, a doctors surgery, and a one form entry primary school, together with associated landscaping, drainage and highway infrastructure works.'</i></p> <p>This site forms part of the public space/habitat zone within the proposed development, including the provision of ponds for Sustainable Drainage Systems (SUDs) and for a Locally Equipped Area of Play (LEAP). Part of the site is affected by flooding. This area's retention as an open space/green infrastructure buffer/link to the wider countryside is imperative and should not be brought forward for housing.</p>
Recommendations	Not a preferred site.

Site ID	BX50
Site Name	Land adjacent to 163 Barnhorn Road
Site Assessment	<p>The site has a rural character, affording long-range views over the Pevensey Levels between gaps in the trees at the southern boundary. This site acts as an important gap between the ribbon development along Barnhorn Road and the wider countryside. The site is part of and relates more to the wider landscape than to the residential development along the A259.</p>

In-depth development would depart from the existing pattern of development and intrude into open countryside and out of keeping with existing linear pattern of development interspersed by gaps along the A259, contrary to Policies OSS3, OSS4 and EN1.

Consideration has been made to a smaller scale development area (alongside existing development) but the gaps in the existing ribbon development positively contribute to the rural character of the edge of Bexhill.

The site is, in relative terms, poorly located in terms of access to services contrary to Policies OSS4 and TRS3. This area is not considered suitable for development.

Recommendations	Not a preferred site.
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Site ID	BX51
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Site Name	Land north of Clavering Walk, Bexhill
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Site Assessment

The site has multiple environmental and on-site constraints, including being adjacent to international and national nature conservation sites (Ramsar and SSSI). A significant proportion of the site is subject to flood risk. The site is predominantly rural in character and development would be an unacceptable intrusion into the open countryside, out of character with the surrounding area, contrary to Policies OSS4 and EN1.

Consideration has also been made to the inclusion of a smaller area of development outside of the area of flood risk, however this is still considered to be an unacceptable intrusion into the open countryside and out of character with the surrounding area. Therefore, this site is not considered suitable for development.

Recommendations	Not a preferred site.
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Site ID	BX52
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Site Name	Land west of Spring Lane
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Site Assessment

This site was previously considered as part of the broad location at West Bexhill. The site has marginal development potential and is significantly constrained. The site is densely wooded (subject to an existing Tree Preservation Order), with the exception of the north-west corner. As such development would be inconsistent with Policy EN5. Part of the site is located within Flood Zones 2 and 3 contrary to Policy EN7. The site is also adjacent to Ancient Woodland and Wet Woodland. The site considered most suitable for amenity provision.

Recommendations	Not a preferred site.
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Site ID	BX53
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Site Name	Land at Westfield, Highwoods Avenue
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Site Assessment

The site is located on the edge of Little Common, west of Highwoods Avenue, adjacent to the development boundary. The site is reasonably located in terms of access to services, in line with OSS4 and TR3.

There are a significant amount of protected trees on the site which help to screen the site from wider views (Area Tree Preservation Order no.371) and are important in mitigating any potential development impact in line with Policies OSS5 and EN1.

Appendix 3

Assessed Sites - Options

The existing access to the site is unregistered and narrow, meaning scope for widening is limited. There may be potential to use an alternative access point but this is likely to also require third party land. Therefore at present it is not possible to consider the site as deliverable given these uncertainties regarding the access.

Recommendations Not a preferred site.

Site ID BX54

Site Name Land at 168 Peartree Lane, Bexhill

Site Assessment

The site would constitute an unacceptable extension of development boundary into the urban fringes, contrary to Policy OSS4 relating to character and appearance of the area. Development of this site could result in an adverse impact on the adjacent Ancient Woodland. The existing highways access is inadequate and improvement to create an acceptable access would result in environmental damage, through the removal of existing trees and hedgerows which are important landscape features in this rural sunken lane. The changes in ground level between the site and road would have a substantial impact on the rural landscape (both short and long-term) and would give the area a more urban feel. The site is located relatively far from local services, contrary to Policies OSS3 and TR3. No indication that the landowner wishes to pursue this site for development. The site is not considered suitable for development.

Recommendations Not a preferred site.

Site ID BX56

Site Name Land south west of Pebsham Farm, Pebsham Lane

Site Assessment

The Pebsham residential estate forms a hard edge to Bexhill and this field provides an important gap and a buffer between the employment floorspace at the business park and the existing residential properties.

This area is located within the Combe Valley Countryside Park as such development at this location would also be contrary to Policy HF1. Therefore, it is not considered suitable for development.

Recommendations Not a preferred site.

Site ID BX57

Site Name Land north west of Pebsham Farm, Pebsham Lane

Site Assessment

The Pebsham residential estate forms a hard edge to Bexhill and this field provides an important gap and a buffer between the employment floorspace at the business park and the existing residential properties.

This area is located within the Combe Valley Countryside Park as such development at this location would also be contrary to Policy HF1. Therefore, it is not considered suitable for development.

Recommendations Not a preferred site.

Site ID BX59

Site Name Land at Glyne Gap Field

Site Assessment

The site is an undeveloped open/agricultural field. The wider Glyne Gap field lying predominantly in Hastings area has also historically been undeveloped. The site lies outside of but immediately adjacent to the Bexhill development boundary. It forms part of a historic open countryside gap between Bexhill and St. Leonards and is included within the Combe Valley Countryside Park (CVCP) designation and is also designated as a Site of Nature Conservation Importance (SNCI).

Any development here would have significant adverse impact on the local landscape character and views. Whilst it is recognised that these impacts are localised, they are considered to be significant in the local context of the CVCP and the gap between the built-up areas of Bulverhythe and Bexhill. The site also forms part of the proposed addition to the Strategic Gap.

Therefore, the site is not considered appropriate for development.

Recommendations	Not a preferred site.
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Site ID	BX60
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Site Name	Land at Beeches Farm, Bexhill
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Site Assessment

This area of tranquil, remote countryside is formed of mainly exposed ground, with long, far-reaching views. There is low-lying ground to the north and west, with residential development to the south on Barnhorn Road. There is little potential to mitigate development at this location, and as such is not considered suitable for development by virtue of character and low-lying ground, as it would be contrary to Policies OSS4, and EN1. The landscape assessment considered that development would only be considered suitable on the southern part of the site and for low key uses such as open space/recreational provision. The site is limited by its topography. The site is well removed from the main built-up area of the town and would therefore be contrary to Policy OSS4.

Recommendations	Not a preferred site.
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Site ID	BX61
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Site Name	Land at Old Town Field, Bexhill
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Site Assessment

The site has far reaching views over the Pevensey Levels. The site rises from south to north. The southern and western parts of the site are closely related to the Pevensey Levels. The site's level of remoteness becomes increasingly significant the further south towards the Pevensey Levels. There is limited potential to mitigate development at this location and therefore development is considered unsuitable, contrary to Policies OOS3, OSS4 and EN1.

Whilst the northern part of the site is read more with the adjacent residential development, there are still significant views towards the Pevensey Levels, with minimal potential to mitigate against impact. As such the site is considered unsuitable for development.

Recommendations	Not a preferred site.
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Site ID	BX64
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Site Name	Land at Moleynes Mead, Fryatts Way
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Site Assessment

The site is located within the existing development boundary and is relatively well screened from the wider countryside by existing residential development on all four sides (although there are some gaps to the west). There is an existing access to Eilerslie Lane which is likely to require re-location and/or improvements for a redevelopment. There is also potential for an additional access from Fryatts Way. The site is reasonably located in terms of access to services in line with Policies OSS4 and TR3. There is also a bus route within walking distance of the site.

The site contains a number of mature trees and these contribute positively to the character of the area, any development should seek to retain them. The southern section of the site is separated from the wider site by an existing Tree Preservation Order and is therefore this area is not considered appropriate as part of the developable area of the site.

Appendix 3

Assessed Sites - Options

The site is occupied by an existing dwelling (Moleynes Mead) which although not listed, is considered to be an undesignated heritage asset. It is therefore considered that any re-development of the site which involved in demolition of Moleynes Mead would not be acceptable.

The site is reasonably located in terms of access to services in line with Policies OSS4 and TR3. There is also a bus route within walking distance of the site. It is likely that a footpath link to Ellerslie Lane would be required to encourage a more direct walking route.

Recommendations	Preferred site (residential).
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Site ID	BX65
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Site Name	Land rear of 290 Turkey Road, Bexhill
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Site Assessment

The site is located adjacent to an East Sussex County Council notified site (for waste disposal), as identified in the Waste and Minerals Development Plan. The field forms an important gap between the existing development along Turkey Road and Ashdown Brickworks. The field is important with regards to the setting of the cemetery, along with that of the field to the north (site BX73). The site is located far from Sidley District Centre, although it is relatively well located with regards to access to schools. The site is outside the existing development boundary identified for Bexhill and is not considered suitable or developable.

Recommendations	Not a preferred site.
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Site ID	BX66
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Site Name	Land at Turkey Farm, Bexhill
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Site Assessment

This site was identified as part of a broad location in the 2013 SHLAA which was carried forward into the Key Diagram within the Core Strategy, while its Policy BX3 anticipates further development to the north of Bexhill, the scale, timing and locations to be determined.

The land is considered remote from the proposed residential allocation (BX123) and does not possess a strong relationship with the existing settlement edge of Bexhill. Vehicular access to this area is also remote from the adjacent proposal and it should also be noted that St Mary's Lane is unlikely to be able to accommodate additional traffic flows without significant modification. Development in this location would also result in the coalescence of Bexhill with the adjoining settlement at 'The Thorne'/Lunsford Cross which would have an adverse impact on the landscape character of this area. Therefore it is considered that this site is not suitable for development.

Recommendations	Not a preferred site.
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Site ID	BX68
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Site Name	Land adjacent to Holly Close, Bexhill
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Site Assessment

The site is located on the edge of Little Common, west of Highwoods Avenue, adjacent to the development boundary. The site is reasonably located in terms of access to services, in line with Policies OSS4 and TR3.

There are a number of trees on the site boundaries which help to screen the site and are therefore important in mitigating any development impact; their retention would be an imperative in line with Policies OSS5 and EN1.

It is likely that additional screening will be needed to mitigate the impact of development at this location, although wider views into the site are difficult to find, given the topography of the land.

The existing access to the site is unregistered and narrow, meaning scope for widening is limited. There may be potential to use an alternative access point but this is likely to also require third party land. Therefore at present it is not possible to consider the site is deliverable given these uncertainties regarding the access.

There are two electricity pylons running north on north/south axis through the site and as such are a physical constraint to development.

At this present time, the landowner has not indicated that they are willing to put the site forward for development.

Recommendations	Not a preferred site.
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Site ID	BX72
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Site Name	Land at Coneyburrow Lane, Bexhill
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Site Assessment

This greenfield site is far removed from the existing development boundary, with part of the site being affected by some flood surface water issues. The site is partially screened with some gaps and can be seen from the main A259 trunk road. This area is poorly located in respect to access to local services. Although there is a regular bus service from the main A259, it is likely that any development would be highly car dependent, contrary to Policies OSS4 and TR3.

This greenfield site forms an important, undeveloped landscape setting for the wider landscape of the Barnhorn Levels looking towards the Hooe Ridge, where development would be contrary to Policies OSS4 and EN1.

Coneyburrow Lane is a narrow country lane which would not be suited to large scale development, as well as being unlikely to be able to achieve a satisfactory access, therefore in conflict with Policy TR3.

Recommendations	Not a preferred site.
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Site ID	BX75
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Site Name	Land west of Forest Barn, Turkey Road
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Site Assessment

The site is an underused area of land north of residential development adjacent to Highwoods Golf Club. The site is surrounded by mature woodland and is adjacent to existing Ancient Woodland and a SNCI. There are no footpaths or road network immediately adjacent to the site, making any potential access difficult, contrary to Policy TR3. The existing highways access is inadequate and improvement to create an acceptable access would likely result in environmental damage.

The site is well removed from services, contrary of Policy OSS4. The area is rural in character and acts as a protective buffer between adjacent Ancient Woodland and residential development to the south.

The site would constitute an unacceptable extension of development boundary into a rural area relating to the character of area, contrary to Policies OSS4 (iii) and OSS3.

No indication that the landowner wishes to pursue this site for development. The site is not considered suitable for development.

Recommendations	Not a preferred site.
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Appendix 3

Assessed Sites - Options

Site ID	BX78
Site Name	Rear of 3a-d Beeching Road/Land north of Windsor Road, Bexhill
Site Assessment	
The area is an existing car park within the Beeching Road area for the business uses which forms the western boundary of the site. These units are in existing employment use and this is likely to continue in the future. The net loss of employment floorspace/parking for existing employment uses to residential purposes would clearly be contrary to Policy EC3.	
Recommendations	Not a preferred site.

Site ID	BX81
Site Name	Land South of Terminus Road, Bexhill
Site Assessment	
This brownfield site is located within the existing development boundary on an existing employment site (car sales/cash wash) site in Bexhill. The site is an edge of the town centre location and is extremely well located in terms of its access to services in line with Policies OSS4 and TR3.	
The site currently occupied by a car sales and car wash business but would be well suited to a more intense business use such as offices given its proximity to the town centre (Policy BX2 refers). Retention of business use on this site is imperative given the proximity to the town centre and adjacent uses (in line with Policy EC3); although it is acknowledged that in order for this to come forward (and given previous, but expired planning permissions) some residential is likely to be needed to facilitate an office development.	
Recommendations	Preferred site (mixed use - residential and offices).

Site ID	BX85
Site Name	12-14 Sutherland Avenue, Bexhill
Site Assessment	
In 2008 outline planning permission was granted (expired in 2011) for the demolition of the existing houses on the site and redevelopment for 14 flats, however a reserved matters application was never submitted to the Council. The site is located within the development boundary in line with Policy OSS3. The site is well located in terms of access to services, particularly Collington train station and is in walking distance to local shops in line with Core Strategy Policies OSS3, OSS4 and TR3.	
There is no evidence to indicate that the landowner wishes to pursue this as a potential allocation and therefore this site cannot be considered deliverable.	
Recommendations	Not a preferred site.

Site ID	BX91
Site Name	Mill Wood, Ninfield Road
Site Assessment	
The majority of the site is subject to an Area Tree Preservation Order and is significant in the countryside setting of the area. The remaining land (around 0.45 hectares) has a number of large trees located within the site. A significant loss of trees at this location would be contrary to Policies EN1 and EN5. There is no existing access to the site and would either require third party land (in the form of an existing house from Beacon Hill) or would require the removal of trees from the area subject to the Area Tree Preservation Order. As such the site is considered inappropriate for development.	
Recommendations	Not a preferred site.

Site ID	BX101
Site Name	Northeye (Former United Arab Emirates -Technical Training Project)
Site Assessment	<p>This large, part brownfield/part greenfield site, lies on a north-facing slope extending down to the edge of the Pevensey Levels on the north side of the A259, a little beyond the western extent of Bexhill.</p> <p>The site's most recent use was as a Training Centre which ceased some years ago. The site covers approximately 15 hectares, with a variety of accommodation, education and operational buildings covering about nine hectares. The remainder is open, with the north-eastern part previously providing recreation fields.</p> <p>Alongside the approach to the site is the small residential estate off Wartling Drive. Otherwise, the setting is very rural in character. It is a very sensitive site, most notably due to its position adjacent to an internationally-designated ecological site (the Pevensey Levels), its largely rural setting and associated visual exposure, as well as being somewhat isolated from the main built-up area of Bexhill. New development in such a situation would normally be resisted, but given the brownfield nature of a large part of the site, redevelopment of that area (excluding land that falls in Flood Zone 3) should be considered.</p> <p>This is poorly located in respect to access to local services, although there is a regular bus service from the main A259. It is likely that any development would be highly car dependent, contrary to Policies OSS4 and TR3.</p> <p>The countryside setting of the site, allied to its fairly self-contained nature, gives rise to a number of possible future uses (employment, residential, tourism and educational). Common to all options is the proposal that the essentially undeveloped area of the site north-east of the stream course should remain open and not be built upon. In particular, this land offers an opportunity to provide additional playing fields, the need for which is identified in the recent Playing Pitch Strategy for Rother and Hastings. If recreational demand does not materialise, then the northern half of the site could return to an agricultural (or possibly low-intensity equestrian) use.</p> <p>Also, in all cases, any development would need to be sympathetic to its sensitive location, both in terms of its impact on the Levels and in reducing the existing visual impact of existing buildings which are seen in the context of fields surrounding the site, particularly when viewing them from the west and the north.</p>
Recommendations	No preferred option is put forward.

Site ID	BX102
Site Name	Land to rear of Town Hall, Amherst Road
Site Assessment	<p>There could be potential for a mixed use regeneration scheme at this location combining residential and business. Existing employment uses on the site should be retained in any potential redevelopment in line with Policy EC3.</p> <p>However, the landowner has not indicated that they wish to dispose of this site at the present time and therefore at this time it cannot be considered that this site deliverable.</p>
Recommendations	Not a preferred site.

Appendix 3

Assessed Sites - Options

Site ID	BX108
Site Name	Land south east of Cooden Wood
Site Assessment	<p>The south-western part of the site is located in Flood Zone 3 with the southern section of the site being located within Flood Zone 2. There is a public footpath which runs along the western boundary of the site. The site is visually exposed in longer views to the Pevensey Levels, particularly in the south west corner, and as such development of this field would be considered an unacceptable intrusion into the countryside, contrary to Policies OSS5 and EN1.</p>
Recommendations	Not a preferred site.

Site ID	BX113
Site Name	Land at Levetts Wood and Oaktree Farm, Sidley
Site Assessment	<p>The site was previously allocated within the Local Plan (2006) for a sustainable mixed use extension to Bexhill. This site specifically relates to the employment element of that allocation. The delay in the site coming forward primarily relates to the delays with the now open Bexhill Hastings Link Road (Combe Valley Way). The North Bexhill Access Road which forms the access route (and northern boundary) to the site from Combe Valley Way is currently under construction.</p> <p>The site is well-contained and largely separated from residential areas to the south and west. It is well related to the existing urban area. It is capable of making a significant contribution to meeting the business land requirements for the town, also serving the wider area. A comprehensive approach is required to ensure integrated provision of employment floorspace (office and light industrial uses are expected), high quality urban design, green infrastructure and mitigation and/or compensation for any biodiversity losses.</p> <p>Linkages with facilities and services in Sidley are vital and will be achieved by improving Buckholt Lane as the main footpath, cycleway and bridleway route from Sidley.</p> <p>Land along the Combe stream to the north-west of the site should be retained as an amenity/wildlife corridor. This includes land around Pebsham Hall and Cottage (both Grade II listed).</p> <p>Beyond the site to the east, adjacent to the Combe Valley Way, lies a sloping field that constitutes a green "tongue" as part of the Countryside Park. This is excluded from the business area and should remain open.</p>
Recommendations	Preferred site (employment).

Site ID	BX114
Site Name	Chestnut Meadow Caravan Park & adjacent land north-east, Ninfield Road
Site Assessment	<p>The site is separated from the built up area of Bexhill and is distant from services, although close to a bus route. The site feels very rural although located close to existing residential development along Ninfield Road. The site is on a ridge-top location and is associated more with the open countryside rather than the residential development within the vicinity, although contained by the adjacent Kilnwood. The Landscape Assessment considers that the area is generally well contained but becomes more exposed at the western end.</p> <p>The site is predominantly rural in character and development would be an unacceptable intrusion into the open countryside, out of character with the surrounding area, contrary to Policies OSS3, OSS4 and EN1. Therefore, this site is not considered suitable for development.</p>
Recommendations	Not a preferred site.

Site ID	BX115
Site Name	Lower Barnhorn Farm and Caravan Park, Barnhorn Road
Site Assessment	<p>This site was originally identified as part of the broad location at West Bexhill. This site comprises of an existing farm building complex and existing caravan park with a temporary planning permission (expires in 2024). The loss of an existing tourism use would be contrary to Core Strategy Policy EC6.</p> <p>The site is relatively well located in terms of access to services in relation to Policies OSS3 and TR3.</p> <p>The site levels are higher towards the existing residential development along Barnhorn Road. The site is adjacent to Ancient Woodland and development of this site would have a negative impact on this block of woodland.</p> <p>Public footpaths which pass through the site are rural in character, development here would have a negative impact on the character of these paths.</p> <p>There are also concerns about the impact of further traffic generation along Barnhorn Road should this site come forward.</p> <p>Given the presumption to retain tourism uses and concerns over further traffic generation, this site is not considered suitable for development.</p>
Recommendations	Not a preferred site.

Site ID	BX116
Site Name	Land off Spindlewood Drive, Bexhill
Site Assessment	<p>This site was originally identified as part of the broad location at West Bexhill. This greenfield site is adjacent to the development boundary of Bexhill, just south of Barnhorn Road/Spindlewood Drive, Little Common. The site is relatively well located in terms of access to services. The site is relatively close to bus services on Barnhorn Road, but there is no current pedestrian route to access Barnhorn Road directly from the site. Any development should provide for a pedestrian route to Barnhorn Road.</p> <p>It is relatively well contained from wider views by the adjacent wood (Cooden Wood), and this is important in containing any development at this location. The site levels are higher towards the existing residential development along Barnhorn Road, and any development will have to consider wider views.</p> <p>The Council's landscape assessment (2008) makes particular reference to the 'block of woodland and trees and hedges' to the west of this site that provide relative enclosure to this area and that this lends the area to some modest development. The adjacent Ancient Woodland to the west of the site is important in containing any potential development. There are two bands of trees that run through the site linking a wooded area to the north with Ancient Woodland to the south. This is an important feature and acts as a wildlife corridor between the two areas of woodland. The area bounded by these trees should remain open and undeveloped as a wildlife corridor/open space feature of the area.</p> <p>There is a viable access point from Spindlewood Drive through an existing field gate and a recent transport assessment is considered acceptable by the Highway Authority.</p>
Recommendations	Preferred site (residential).

Appendix 3

Assessed Sites - Options

Site ID	BX120
Site Name	Land at Barnhorn Green
Site Assessment	
<p>This site forms part of the Barnhorn Green area which has an extant outline planning permission for 275 dwellings, up to 3,500sqm of employment floorspace, a nursing home, a doctors surgery, and a one form entry primary school, together with associated landscaping, drainage and highway infrastructure works. Recent discussion with East Sussex County Council has indicated that the area set aside for the primary school is no longer required.</p> <p>Generally the area is well enclosed and the strong tree structure affords opportunities for good mitigation of any potential development and is a good basis for the development of defined neighbourhoods. There is an existing Tree Preservation Order (No.341) which runs through the site and is primarily located along the existing field boundaries.</p> <p>The site is reasonably well located for access to local services at Little Common District Centre.</p> <p>Development in this location requires a number of highway improvements along Barnhorn Road and to Little Common Roundabout as part of the wider Barnhorn Green site.</p> <p>Development should not increase flood risk (regulated outflow of water to Picknell Green Stream).</p> <p>A number of Public Rights of Way run through/about the site (11a, 11b, 12a) and any development must ensure that these footpaths are maintained and enhanced.</p> <p>The site is located within the Pevensey Levels Hydrological Catchment, with implications for SuDS treatments.</p>	
Recommendations	Preferred site (residential).

Site ID	BX121
Site Name	Land adjacent to Station Road
Site Assessment	
<p>This site is located within the development boundary for Bexhill and comprises of a range of uses across the site (the majority of which are occupied) including a youth centre, garage, small scale industrial/ business units, telephone exchange, place of worship, small-scale retail and service uses and residential. The site is irregularly shaped and relatively limited in size, which render it unsuitable for any significant retail development. The site is also constrained by busy roads to the north and south.</p> <p>Numerous ownerships across the site are likely to make assembly complex. The site is unlikely to become available in the short to medium term.</p> <p>Relocation of telephone exchanges is notoriously costly. Furthermore, it is noted that there are a number of existing businesses on the site which may require relocation.</p> <p>Given the shortcomings in terms of suitability for a retail-led redevelopment, and the mix of occupied uses, it is considered unlikely that a viable development could be brought forward on the site within a reasonable time period.</p>	
Recommendations	Not a preferred site.

Site ID	BX122
Site Name	Land south east of Beeching Road, Bexhill
Site Assessment	
<p>This brownfield site is located on the south-eastern end of Beeching Road and comprises of a mix of uses, predominantly employment uses but with some large vacant and underused buildings. There is an existing public car park and coach and lorry park within the site.</p>	

There are significant level differences across the site, falling from Beeching Road in the west towards the eastern boundary. There is a culvert which runs through the site. A large proportion of the site suffers from surface water flooding.

The centre of the site is located within 300m of the Bexhill town centre boundary, which is considered edge-of-centre (in sequential test terms) provided there is a clear and unimpeded pedestrian route between the site and the town centre. It therefore provides an opportunity to meet the identified retail need in Bexhill. There may also be the opportunity to achieve some office floorspace as part of a redevelopment.

There is an existing footpath along the eastern boundary of the site joining Terminus Road with Wainwright Road, but it is narrow, unmade and uninviting.

Redevelopment of this area would involve the redevelopment of part of an existing industrial estate which would result in the net loss of employment floorspace.

The freehold of the land is in one ownership, but there are multiple leases and sub-leases. There has been some consolidation of leasehold ownerships in recent years.

Recommendations	Preferred site (retail).
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Site ID	BX123
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Site Name	Sidley Sports and Social Club
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Site Assessment

The site comprises of an area of grassed, open space formerly used as a playing field accommodating a full size adult football pitch/full size cricket pitch and ancillary facilities. It is privately owned and not currently available for use for sports or recreation. The site is surrounded on all sides by existing housing and is in close proximity to Sidley District Centre.

The Council's Playing Pitch Strategy highlights a shortfall in football pitches across the District and particularly in Bexhill. The site is in a highly accessible location and has been previously referenced in the Council's Open Space Sport and Recreation Study as an important outdoor sports facility and is specifically mentioned as scoring amongst the top three sites in terms of both accessibility and value within the District, supporting the importance of an outdoor sports facility in this location. As such, it is considered that the site be safeguarded specifically for playing pitch provision.

Recommendations	Preferred site for playing pitches.
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Site ID	BX124
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Site Name	North Bexhill
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Site Assessment

This site was identified as part of a broad location in the 2013 SHLAA which was carried forward into the Key Diagram within the Core Strategy, while its Policy BX3 anticipates further development to the north of Bexhill, the scale, timing and locations to be determined.

The route of the North Bexhill Access Road (NBAR) has now gained planning permission and construction has started at the eastern end. The road crosses the Combe Valley east of Buckholt Lane, rising up the south facing slope of the valley to an elevated position before joining the A269 just beyond the current edge of the built-up area.

The NBAR provides a logical outer limit of development (see BX125 below). The intervening land between it and the existing built-up area comprises a mix of farmland and woodland, together with a few scattered properties, either side of the valley of the Combe Haven. A landscape-led approach to development in this area has been considered important. Accordingly, a 'landscape and ecology study' has informed development options.

Appendix 3

Assessed Sites - Options

The valley floor itself provides not only a natural green space but also the opportunity for this to be enhanced both for biodiversity and as an amenity and recreational public access corridor. Existing woodlands should be retained with green links provided between them. The patchwork of small fields west of Watermill Lane are found to be valuable in ecological terms as well as contributing to the more rural character of the northern section of the lane.

There remain areas of development potential between the A269 and NBAR, to the north of the Ninfield Road and to the east of Watermill Lane. A fairly modest average density of 30 dwellings per hectare is considered appropriate, taking account of the substantial greenspace areas around them for ancillary and other recreation facilities, including sports pitches. This would provide for some 450 dwellings.

Provision is also made for a small traveller site, of five pitches at the eastern end of the development area east of Watermill Lane. This area is relatively contained in the landscape and would contribute to the outstanding district-wide need for such pitches.

Further areas for development have been considered, but these would encroach unnecessarily into the setting of the town and this new development, and fail to create the quality of urban extension that is sought.

Recommendations	Preferred site for comprehensive development.
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Site ID	BX125
Site Name	North of NBAR
Site Assessment	
<p>This site was identified as part of a broad location in the 2013 SHLAA which was carried forward into the Key Diagram within the Core Strategy, while its Policy BX3 anticipates further development to the north of Bexhill, the scale, timing and locations to be determined.</p> <p>The route of the North Bexhill Access Road (NBAR) has now gained planning permission and construction has started at the eastern end. The road crosses the Combe Valley east of Buckholt Lane, rising up the south facing slope of the valley to an elevated position before joining the A269 just beyond the current edge of the built-up area.</p> <p>The NBAR provides a logical limit of development. Maintaining the upper slopes as undeveloped is regarded as important in retaining the more natural treed backcloth to the town and in ensuring that development does not intrude into the wider countryside to the north.</p> <p>A further consideration is the desire to maintain the separate identity of Lunsford Cross, which reinforces the physical containment of development south of NBAR.</p> <p>For these reasons, the development of this area is not suitable for development; nor is it needed to meet the development requirements for the town.</p>	
Recommendations	Not a preferred site.

20.2. Hastings Fringes

Site ID	HF2
Site Name	Land adjacent to Capricorn, Chowns Hill
Site Assessment	
<p>The site is exposed in long views on the higher part of the slope, and is considered to positively contribute to the rural character of the area and would result in urbanisation of open rural land within the High Weald Area of Outstanding Natural Beauty (AONB); as such any development would be in conflict with Policies OSS1, OSS2, OSS3, OSS4 (iii) and EN1 (i), (v).</p>	

The site is subject to an Area Tree Preservation Order – Tree Preservation Order (No. 318). The trees are important features of the site and contribute to the natural beauty of the landscape and AONB countryside.

The only viable access point would be from Chowns Hill, but the road is narrow, has poor alignment and there are a lack of footways. Although there is an existing footpath on the opposite side just up from the site.

Development would be reliant on the use of a car. The site is not well located to existing services. As such, any proposed development would be in direct conflict with Core Strategy Policy TR3.

Recommendations	Not a preferred site.
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Site ID	HF3
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Site Name	Land on Stonestile Lane
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Site Assessment

The land parcel is contained, in some parts, by mature established trees from Stonestile Lane, although there are some long views to the north and west. There are also a number of mature trees within the site. Given the surrounding character of the area and relative exposure to the wider landscape (in long views) would conflict with Policies OSS4 and EN1 (i), (v).

Development access is via an existing narrow country lane (Stonestile Lane) and is relatively remote from existing services. There are no existing pavements on Stonestile Lane for pedestrians and it would not be practical to include them as part of a development (Stonestile Lane is very narrow). As such it is direct conflict with Policy TR3(i).

Recommendations	Not a preferred site.
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Site ID	HF4
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Site Name	Land at Michael Tyler Furniture Site
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Site Assessment

This brownfield site is located within the Hastings Fringes development boundary and in existing employment use (only partly occupied) the existing occupiers are looking to relocate. Policy EC3 in the Core Strategy seeks to protect existing employment uses. Recent evidence has indicated that this site is under occupied and finding alternative occupiers has proved problematic (floor level changes, compartmentalisation, buildings are dated and scale of the buildings are likely reasons for the low level interest). There are viability concerns for redevelopment for alternative business uses.

There are low density residential properties to the south, west and north of the site with further residential development currently under construction to the east. There is a couple of existing low density residential properties to the north within the High Weald Area of Outstanding Natural Beauty with far reaching views.

The site is in a sustainable location, close to services located within Hastings in line with Policies OSS3 and OSS4.

On balance, it is considered that this site would better contribute towards housing provision within the District rather than be safeguarded for employment uses given the viability concerns detailed above.

Recommendations	Preferred site (residential).
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Appendix 3

Assessed Sites - Options

Site ID	HF5
Site Name	Land at Breadsell Farm
Site Assessment	
<p>This area was previously identified as a draft option through the early consultation stages of the Core Strategy, to facilitate a “sustainable urban extension” for a mixed-use development within Hastings Borough including around 750 dwellings. Natural England (NE) submitted a strong objection to the area being included due to the likely adverse impact on the adjacent SSSI. To date no evidence has been submitted to demonstrate to NE’s satisfaction that development can be achieved without a detrimental impact to the adjacent SSSI, as such any development is likely to be contrary to Policy EN5. Hastings Local Plan (LP) Inspector concurred with NE.</p> <p>Although the land itself does not have any particular landscape designation, the Hastings LP Inspector found that.”...its topography within its ridges and valleys, its field boundaries, trees and other vegetation give it considerable scenic attraction. It is a prominent site in the wider surroundings. The locality.... with its trees, woodland and topography of steep slopes and open spaces is a valuable part of the lovely, rural and sylvan setting of the Borough’s mainly built-up areas”. As such, the site is not allocated in Hastings’ Local Plan.</p> <p>The site is remote from services (contrary to Policies OSS3 and OSS4) and is located within the Strategic Gap (contrary to HF1).</p>	
Recommendations	Not a preferred site.

Site ID	HF6r
Site Name	Land adjacent to Rock Lane, Hastings
Site Assessment	
<p>The general area is west facing valley and appears to a well-used, but poorly managed area of open space on the urban fringe. The landscape assessment considers that there is scope to restructure the landscape on the valley sides to create pockets of development, although the entire valley area should be considered as an area for urban fringe management, in line with Core Strategy Policy HF1. Land to the east along the roadside of Rock Lane has recently been granted planning permission for 26 dwellings, with the land to the rear (this site - HF6r) being secured for improved landscape management and ecological improvements, as well as the provision of a public footpath along the southern and western boundaries to the bottom of the valley in line with the provisions of Policy HF1 to create access improvements to the area between Ivyhouse Lane and Rock Lane.</p> <p>This area is not considered suitable for residential development due to adverse landscape impact and it would be more appropriate to bring forward as an open area benefiting from improved landscape and ecological improvements in line with the provisions of HF1 and a proposed policy relating to Urban Fringe Management in this area.</p>	
Recommendations	Not a preferred site.

Site ID	HF8e
Site Name	Land north of A265, Ivyhouse Lane
Site Assessment	
<p>This area could be developed without having a significant detrimental effect on the landscape character or visual quality of the Area of Outstanding Natural Beauty (AONB) landscape in line with Policies Core Strategy Policies HF1, OSS1, OSS3 and EC2.</p>	

Given surrounding industrial uses and the need for low density, small scale business units, the site is not suitable for housing development but suited to low key employment uses in line with the adjacent employment allocation in Hastings and the surrounding industrial estate. An appropriate landscape buffer will need to be achieved to soften the edge of the industrial area to the wider valley.

Development could be used to facilitate access to open space from the existing Public Right of Way to the west off Ivyhouse Lane to the footpath to the north of the valley, in line with the wider access and landscape improvements highlighted in Policy HF1 of the Core Strategy.

A management plan/policy for the whole area will need to be developed to bring forward an area-based initiative to enhance the AONB in this generally despoiled area. With some small areas of development on both sides of the valley being used to provide landscape and access improvements to this urban fringe area for households in Hastings and Rother (Policy HAS2).

Recommendations	Preferred site (employment).
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Site ID	HF8r
Site Name	Land north of A265, Ivyhouse Lane

Site Assessment

This area cannot be developed without having a significant detrimental effect on the landscape character or visual quality of the Area of Outstanding Natural Beauty (AONB) landscape contrary to Core Strategy Policies HF1, OSS3 & OSS4. The Ivyhouse – Rock Lane Landscape Assessment considers that development in this area would result in a detrimental effect on the landscape character and visual quality of the wider AONB landscape.

However, development of the adjacent site (HF8e) could be used to facilitate managed access to the countryside, joining up the existing Public Right of Way off Ivyhouse Lane to the footpath to the north of the valley, in line with the wider access and landscape improvements highlighted in Policy HF1 of the Core Strategy.

Whilst this site is considered visually exposed and not suited to development, a management plan/policy for the whole area will need to be developed to bring forward an area-based initiative to enhance the AONB in this generally despoiled area, which with some small areas of development on both sides of the valley being used to provide landscape and access improvements to this urban fringe area for households in Hastings and Rother.

Recommendations	Not a preferred site.
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Site ID	HF9
Site Name	Land at Rock Lane, Guestling

Site Assessment

This site is visually exposed and development on the slopes into the valley would be out of character with its surroundings contrary to Policies OSS3 and OSS4. The area is well used as informal recreation space by surrounding residents primarily for dog walking.

This part of the valley would be most suited to use as an area of open space in line with the urban fringe management provisions set out in Core Strategy Policy HF1 and proposed policy relating directly to urban fringe management in this area.

Whilst this site is considered to be visually exposed and not suited to development, a management plan/policy for the whole area will need to be developed to bring forward an area-based initiative to enhance the Area of Outstanding Natural Beauty in this generally despoiled area, which with some small areas of development on both sides of the valley being used to provide landscape and access improvements to this urban fringe area for households in Hastings and Rother.

Recommendations	Not a preferred site.
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Appendix 3

Assessed Sites - Options

Site ID	HF9a
Site Name	Land north of Austen Way
Site Assessment	
<p>This part of the valley is visually exposed and development in this location would be out of character with its surroundings contrary to Policies OSS3 and OSS4.</p> <p>The central part of this site is used for dog walking primarily along the existing Public Right of Way which runs through the site. This area is considered beyond the part of the Hastings Fringe locality covered by Core Strategy Policy HF1 and there is little development potential on this site, particularly as there is an existing agricultural use and existing residential properties within the site itself. As such development here would be considered an unacceptable intrusion into the countryside.</p> <p>Aside from the landscape issues, East Sussex County Council highways have advised that access would be most suited via Austen Way which would require land acquisition to create a junction on the north side. This is therefore not considered to have a reasonable prospect of coming forward.</p>	
Recommendations	Not a preferred site.

Site ID	HF18a
Site Name	Land east of Burgess Road
Site Assessment	
<p>The land is undulating, sloping steeply down from its accesses on Burgess Road and Haywood Way, and is largely covered with trees and vegetation with some cleared areas including a substantial, informal series of BMX bike jumps and tracks. Three overhead power lines cross the site and a railway tunnel passes underneath it. There are no formal public rights of way within the site but there is evidence of public access including by vehicles and BMX bikes as well as some areas of fly-tipping.</p> <p>The site adjoins a larger area of woodland to the north, part of which is also within the applicant's ownership. A small area of woodland, 90 metres north-east of the site, is designated Ancient Woodland. The site is within the High Weald Area of Outstanding Natural Beauty. The land is directly adjacent to the existing Ivyhouse Lane industrial estate. A modest extension to the industrial estate (of around 3,000sqm in addition to the adjacent employment allocation in Hastings Borough for circa 1,400sqm) could facilitate appropriate management of the woodland to the north of the site, a softened edge to the industrial estate to create an appropriate transition from the hard edge urban edge of Hastings to the High Weald, whilst also allowing opportunities for managed access to the countryside.</p>	
Recommendations	Preferred site (employment).

Site ID	HF18r
Site Name	Land to north west of Burgess Road
Site Assessment	
<p>The site is a large area of woodland, part of which is also in the same ownership as the adjacent site (HF18a). A small area of woodland, north-east of the site, is designated Ancient Woodland. The site is within the High Weald Area of Outstanding Natural Beauty.</p> <p>The land is undulating, sloping steeply down from its accesses on Burgess Road and Haywood Way, and is largely covered with trees and vegetation with some cleared areas and evidence of informal access, including by vehicles and BMX bikes as well as some areas of fly-tipping, extending into it. However, there are no formal public rights of way within the site. Three overhead power lines cross the site and a railway tunnel passes underneath it.</p>	

The land lies to the north-east of the Burgess Road preferred employment option (HF18a) which is proposed as a modest extension to the industrial estate and would facilitate appropriate woodland management of this land and create a softer edge to the industrial estate and an appropriate transition from the hard edge urban edge of Hastings to the High Weald, whilst also allowing opportunities for managed access to the countryside.

Recommendations	Not a preferred site.
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Site ID	WL2
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Site Name	Land rear of 66-78 Westfield Lane
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Site Assessment

The site is remote from existing services particularly those in walking distance, although there is an existing bus route along Westfield Lane. Any development in this location would be heavily car dependent, contrary to Policies OSS4 and TR3. Even if the land designated Ancient Woodland was removed from the proposed site, any development would be a significant departure from the existing linear pattern of development at this location, creating an unacceptable backland intrusion into the landscape, contrary to Core Strategy Policy EN1.

Access to the site would be difficult to achieve; it is narrow with a sub-station at the top where it meets Westfield Lane meaning that it would be difficult to upgrade to provide an acceptable access, therefore contrary to Core Strategy Policy TR3. Maplehurst Drive to north-west is narrow and is separated from the site itself; any potential to achieve an access at this point would require third party land.

Recommendations	Not a preferred site.
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Site ID	BB2
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Site Name	Land adjoining Millward Gardens, Batchelors Bump
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Site Assessment

The site has a strong rural character, affording long-range views over the High Weald countryside both to the west and the north. Although the site contains some existing built development (farm buildings relating to the agricultural holding), the site relates more to the wider countryside landscape (High Weald Area of Outstanding Natural Beauty) rather than to the residential development along the A259. In depth development of the domestic curtilages outside the current development boundary would depart from the existing pattern of development and intrude into open countryside.

The sloping nature of the site and its open aspect would result in any development being prominent in the landscape and out of keeping with existing linear pattern of development interspersed by significant gaps along the A259, contrary to Policies OSS3, OSS4 and EN1.

Recommendations	Not a preferred site.
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Appendix 3

Assessed Sites - Options

Site ID	BB3
Site Name	Land west of Winchelsea Road, Batchelors Bump
Site Assessment	
<p>The site has a strong rural character affording, long-range views over the High Weald Area of Outstanding Natural Beauty (AONB) countryside both to the west and the north (the majority of the site is located within the High Weald AONB). The site is part of and relates more to the wider landscape than to the residential development along the A259. Frontage development in this location would join Batchelors Bump to Hastings to the detriment of the openness of the gaps in this area. In-depth development would depart from the existing pattern of development and intrude into open countryside. The site slopes downwards to the west towards the wooded/scrub valley. The downward sloping nature of the site and its open aspect would result in any development being prominent in the landscape and out of keeping with existing linear pattern of development interspersed by significant gaps along the A259, contrary to Policies OSS3, OSS4 and EN1. This locality is important to the landscape setting of Hastings.</p> <p>Consideration has been made to a smaller scale development area (alongside existing development) but the gaps in the existing ribbon development positively contribute to the rural character of Batchelors Bump.</p> <p>Therefore it is not considered that there is development potential at this location.</p>	
Recommendations	Not a preferred site.

Site ID	BB4
Site Name	Land at Thorsfield and Chatswood House
Site Assessment	
<p>The site has a strong rural character, and is extremely exposed, particularly to the south, north and west with views into the High Weald Area of Outstanding Natural Beauty. The site relates more to the wider landscape than to the residential development along the A259. In depth development of the domestic curtilages outside the current development boundary would depart from the existing pattern of development and intrude into open countryside.</p> <p>The introduction of development in this location would be particularly intrusive on the wider landscape, and out of keeping with existing linear pattern of development interspersed by significant gaps along the A259, contrary to Policies OSS3, OSS4 and EN1.</p>	
Recommendations	Not a preferred site.

20.3. Villages - Beckley Four Oaks

Site ID	FO1
Site Name	Land at Ilex Cottage, Four Oaks
Site Assessment	
<p>FO1 comprises of two existing residential properties (Ilex Cottage and the Grade II listed Oakhill House respectively) and associated grounds. Significant parts of FO1 are vulnerable to surface water flooding which would require part of the site to be given over to SUDS mitigation if the site came forward. Access could be delivered onto the A268 but the close proximity of the busy roundabout would mean the access point into the site would require adequate visibility sight lines for vehicles to safely enter and exit the site without significant danger to vehicles negotiating the roundabout. A further constraint involves the number of trees present within the site and on the boundary of FO1. The setting of the Grade II Listed Building on the southern part of the site would also be impacted. Given the constraints attached to FO1 the site is not recommended for housing.</p>	
Recommendations	Not a preferred site.

Site ID	FO2
Site Name	Former Vineyard site, Whitebread Lane, Four Oaks
Site Assessment	FO2 is a former vineyard located on the village fringe. The site abuts the settlement boundary. Access into the site would be off Whitebread Lane. The site is rural in nature with medium and long views into the open countryside to the southwest and west. Some evidence of surface water flooding around the edge of the site. Relatively distant from the centre of Beckley and access to main services. There is no formal footpath back to the village from FO2.
Recommendations	Not a preferred site.

Site ID	FO3
Site Name	Land at Pear Orchard, Four Oaks
Site Assessment	Poorly related to the village and distant from services. The site is not in a sustainable location. Development would impact on the Area of Outstanding Natural Beauty landscape with significant loss of trees if development is considered here.
Recommendations	Not a preferred site.

Site ID	FO4
Site Name	Land West of Oakley Cottages, Main Street, Four Oaks
Site Assessment	FO4 is located outside the existing settlement boundary. The land is used for grazing horses and other livestock. Along with FO8, FO4 traverses a network of historic field boundaries which are integral to the character of the High Weald Area of Outstanding Natural Beauty. Significantly, Beckley has a linear settlement pattern with clear breaks along the streetscape (Main Street) this is integral to the fabric of the village. FO4 is one of those gaps. Infilling those significant gaps would significant alter the character of the village and negatively impact on the wider AONB landscape.
Recommendations	Not a preferred site.

Site ID	FO5
Site Name	Land at The Retreat, Whitebread Lane, Four Oaks
Site Assessment	FO5 is located on the edge of Four Oaks on Whitebread Lane and is currently overgrown with shrub and vegetation. The site is relatively distant from the main services in the centre of the village, and just beyond the edge of the built-up area and outside the settlement boundary. It is constrained by boundary trees and the frontage pattern of existing development that limit development potential. Access into the site would be off Whitebread Lane but there is currently no pedestrian footpath leading back into the village. The site is designated BAP habitat Deciduous Woodland and records indicate surface water flooding on the northern boundary. A small stream is also present near the northern boundary. The planning history of the site reveals a refusal for both a bungalow and in a separate application for a chalet. Both applications were refused on the grounds of the impact on the Area of Outstanding Natural Beauty. In conclusion, the size of the site and the constraints attached to it make FO5 unsuitable for a housing allocation.
Recommendations	Not a preferred site.

Appendix 3

Assessed Sites - Options

Site ID	FO6
Site Name	Land to east of Coombs Cottages, Peasmarsh Road, Four Oaks
Site Assessment	
FO6 is on the edge of the village, rural in character and contributes to the character of the High Weald Area of Outstanding Natural Beauty (AONB). Ancient semi-natural woodland abuts the eastern boundary of the site. A public footpath crosses the southern part of the site. It is proposed that a small parcel of farmland to the rear of the former engineering works on Hobbs Lane may come forward as part of a comprehensive development to round off the edge of the village and consolidate the village fringe, subject to new screen planting on the eastern and northern boundary to minimise visual intrusion into the wider AONB landscape. Please refer to FO15 for further details. However apart from the small parcel of farmland in the north east corner of the FO6, the rest of FO6 is not considered appropriate for housing.	
Recommendations	Not a preferred site.

Site ID	FO7
Site Name	Land north of Beckley Gallery, Four Oaks
Site Assessment	
FO7 is well screened from the main road and is currently used as a paddock. The site slopes and rises gently from north to south and there are trees and hedgerows along the boundary of the site which screen the site from the wider Area of Outstanding Natural Beauty landscape. Access could be delivered off A268 but there is no current pedestrian footpath along this part of the A268. The site is also on the edge of the village and rural in character and also relatively distant from key services. Furthermore, development here would impact negatively on the setting of the Listed Building to the north of FO7. Not recommended for housing.	
Recommendations	Not a preferred site.

Site ID	FO8
Site Name	Land at Westlands, Four Oaks
Site Assessment	
FO8 located off Main Street but outside the settlement boundary. The frontage of FO8 comprises one of the important gaps in the street frontage on Main Street which gives Beckley its distinctive character. Infilling of these gaps would impact negatively on the High Weald Area of Outstanding Natural Beauty (AONB). Maps indicate FO8 along with FO4 and FO2 form part of network of historic fields which are integral to the character of the High Weald AONB.	
Records highlight surface water flooding on the northern boundary of FO8 and part of northern half of the site. A pond is also located within the site and should be retained as they form an important feature of the High Weald AONB. The impact of development on the AONB landscape would be considerable while infilling of important gaps along Main Street would undermine a vital characteristic of the village street scene and should be resisted. FO8 is not recommended for housing.	
Recommendations	Not a preferred site.

Site ID	FO9
Site Name	Land adjacent to Roberts Row, Whitebread Lane, Four Oaks
Site Assessment	FO9 is relatively distant from the main amenities of the village. The site can only be accessed off Whitebread Lane through a narrow access point between existing properties, with a terrace called 'Roberts Row' having Grade II listed status on one side. There would be a requirement to significantly upgrade the existing access point, which would negatively impact on the curtilage and setting of the listed 'Roberts Row' terrace. Flood maps indicate there is significant surface water flooding indicated at the access point and on a large proportion of the western end of the site. Amenity impact on adjacent properties. Biodiversity records also indicate that the White-barred Knot-horn moth is also present in the area. FO9 is not recommended for housing.
Recommendations	Not a preferred site.

Site ID	FO10
Site Name	Land at King Bank Lane, Beckley
Site Assessment	FO10 is located outside the existing settlement boundary. There could be a negative impact on setting and amenity of the Listed Buildings immediately to the north of the site. Development here would impact on the setting of the village and the characteristic Area of Outstanding Natural Beauty landscape. Not recommended for housing.
Recommendations	Not a preferred site.

Site ID	FO12
Site Name	Land at Buddens Green, Four Oaks
Site Assessment	Relatively central to the village, close to existing services and in a sustainable location but located outside the settlement boundary and within the Area of Outstanding Natural Beauty (AONB). Views here do not extend into the open countryside as the southern boundary is confined by a thick tree belt, minimising the impact on the wider AONB. There are several access points that can be achieved. Housing development will be contained behind the existing Buddens Green estate offering better integration into the village and limiting visual intrusion into the wider AONB landscape. Amenity space will be provided on the western half of the site.
Recommendations	Preferred site (residential).

Site ID	FO13
Site Name	Land adjacent to Frog Field, Main Street Beckley Four Oaks
Site Assessment	Relatively central to the village, close to existing services and in a sustainable location but located outside the settlement boundary and within the Area of Outstanding Natural Beauty (AONB). Residential development here would involve 'infilling' of one the prominent gaps in the village streetscape which would impact negatively on the wider AONB landscape and the character/setting of the village.
Recommendations	Not a preferred site.

Appendix 3

Assessed Sites - Options

Site ID	FO14
Site Name	Westlands
Site Assessment	
FO14 is sited outside the development boundary and within the Area of Outstanding Natural Beauty (AONB). The site is identified as having an historic medieval field boundary and is considered integral to the character of the High Weald AONB. In addition, there is indication of surface water flooding on the frontage of the site. The property opposite the site is Listed. FO14 is one of the 'gaps in the streetscape which is a key distinguishing feature of the village. These gaps between the clusters of dwellings are important to the character of the village therefore it is desirable to retain the existing gaps. To fill in the gaps would impact on the character of the village and the wider AONB landscape and would be contrary to the existing settlement pattern of the village. It follows that development at FO14 would not be appropriate and therefore should not be considered as a potential housing site.	
Recommendations	Not a preferred site.

Site ID	FO15
Site Name	Land East of Hobbs Lane
Site Assessment	
FO15 comprises of the former engineering works and a small parcel of farmland to the rear to come forward together as a comprehensive development. The former engineering works are currently empty. Core Strategy Policy EC3 would apply but it appears that the building no longer has any commercial value and has been empty for a number of years. There is scope to develop the brownfield site along with small parcel of farmland to the rear of the site to round off the edge of the village and consolidate the village fringe. There will be a requirement to upgrade pedestrian access along Hobbs Lane to make the development more acceptable and strengthen linkages back into the village. Existing bus stops can be found at the end of Hobbs Lane and links the settlement with two larger villages in the area, Peasmarsh and Northiam respectively. Native screen planting to the northern and eastern boundary would limit further visual encroachment into the wider Area of Outstanding Natural Beauty (AONB) landscape. While FO15 is a site on the village fringe, there is an opportunity to redevelop a brownfield site which has been vacant for a number of years, with little or no scope to come back into economic use, for residential development which will provide much need affordable housing for the village as well as removing a local eyesore from the village environment. Furthermore, there will be an opportunity to enhance this part of village fringe and the wider AONB landscape with appropriate landscape screening of the northern and eastern boundaries of the site.	
Recommendations	Preferred site (residential).

Site ID	BE7
Site Name	Chestnuts Paddock
Site Assessment	
BE7 is outside the existing settlement boundary and relatively distant from the village's main amenities. Development could impact on the setting of Chestnut Cottage the Grade II Listed Building adjacent to BE7. Development of BE7 would also impact negatively on the character/setting of the village especially as you approach the village from the west along the A2088.	
Recommendations	Not a preferred site.

Site ID	BE10
Site Name	Land adjacent to community hall, Main Street, Beckley
Site Assessment	BE10 is adjacent to the village hall and has a number of trees onsite. The site is currently outside the existing settlement boundary. A public footpath runs down the western boundary of the site. Identified as a Biodiversity Opportunity Area (BOA) and records indicate the presence of grass snakes in the locality. BE10 occupies one of the important gaps in the village streetscape which are integral to the character of the village. Infilling one of these gaps would impact on the character of the AONB landscape to the detriment of the village and its character.
Recommendations	Not a preferred site.

Site ID	BE11
Site Name	Land at Horseshoe Lane
Site Assessment	BE11 is located away from the existing settlement boundary and is relatively distant from the main amenities of the village. The topography of the site would mean only southern part of the site could be developed. Views of BE11 are readily available from the footpath which abuts the southern boundary, making the site exposed in the wider Area of Outstanding Natural Beauty (AONB) landscape. Development on BE11 would impact negatively on the character of the AONB landscape especially as you approach the village from the south and should not be considered appropriate as a potential housing site.
Recommendations	Not a preferred site.

20.4. Villages - Broad Oak

Site ID	BO1
Site Name	Land west of Tillingham View, Broad Oak
Site Assessment	BO1 sits outside the settlement boundary and is currently used as pasture land. Suitable access is a significant constraint and would be required across third party land. The site sits within the Area of Outstanding Natural Beauty (AONB) landscape and Ancient Woodland abuts the north west boundary of the site. Consideration of the amenity of properties along Tillingham View should also be considered. There is a public right of way which runs along the north west boundary of BO1. Satisfactory access arrangements would preclude this site from further consideration. The complete redevelopment of BO1 for housing is neither necessary or appropriate for the village of Broad Oak at this time.
Recommendations	Not a preferred site.

Site ID	BO2
Site Name	Land to South of Goatham Lane, Broad Oak
Site Assessment	BO2 is located in an unsustainable location. It is distant from the village, away from services. There is no adequate footway from the BO2 back into the village. Development in this location would impact negatively on the Area of Outstanding Natural Beauty landscape.
Recommendations	Not a preferred site.

Appendix 3

Assessed Sites - Options

Site ID	BO4
Site Name	Land at Burnt House Farm, Broad Oak
Site Assessment	BO4 is located on the village fringe and outside the existing settlement boundary. The site is relatively flat with long extensive views, especially to the east. Existing hedgerows along the frontage of the site screens the site from the public highway. However, long views can be achieved from the east of the site and development here would impact negatively on the wider Area of Outstanding Natural Beauty landscape. Furthermore, access is restricted and would require 3rd party land to achieve satisfactory access arrangements.
Recommendations	Not a preferred site.

Site ID	BO9
Site Name	Land opposite Bell Hurst Cottage, Chitcombe Road
Site Assessment	BO9 currently lies outside the existing settlement boundary but is flanked by existing development on both the eastern and western boundary. The northern boundary fronts onto the A2089 (Chitcombe Road). Investigation into the Planning History of BO9 identifies two historic applications: RR/2004/601/P and RR/2005/181/P. Both were refused on ground of outside the settlement boundary, located in the open countryside and proposed inadequate access arrangements. Furthermore, the site is visible from the south of the ridge line and can be seen from public vantage points to the south of Broad Oak. Residential development would impact on the Area of Outstanding Natural Beauty landscape.
Recommendations	Not a preferred site.

Site ID	BO10
Site Name	Sunbeam Farm Yard, Udimore Road, Broad Oak
Site Assessment	Part of BO10 is with the settlement boundary but with the main body of BO10 located outside the existing settlement boundary south of the ridgeline. Development on the open slopes would be to the detriment of the character of the area and unacceptable in terms of impact to the Area of Outstanding Natural Beauty landscape. Furthermore, the loss of rural workshops and farm buildings would be contrary to the policies in the Core Strategy, which supports the farming capacity of the district and resists the loss of viable employment land especially in rural areas.
Recommendations	Not a preferred site.

Site ID	BO11
Site Name	Land South of the Old Manor House
Site Assessment	BO11 is located outside the settlement boundary and sits within the AONB landscape. Access into BO11 would be from A28 but adequate safe sightlines may be difficult to achieve on the fast flowing Northiam Road. To the north the setting of 'Manor House', a Grade II Listed Building, may be impacted from the development of BO11. The site has many trees within the site and along the frontage of the site. The potential loss of trees will impact on the setting and character of the village as you approach from the south. Development south of the ridge line would be to the detriment of the character of the area and to the wider Area of Outstanding Natural Beauty landscape.
Recommendations	Not a preferred site.

Site ID	BO12
Site Name	Land to the Rear of Malvern Cottage
Site Assessment	
BO12 is located outside the settlement boundary on the A28 road between Broad Oak and Cackle Street. The site is detached from the main settlement. Extensive views are attainable to the east and south east into the wider Area of Outstanding Natural Beauty landscape. Development here would impact negatively on the wider landscape and would be unacceptable. Planning History records previous refusal for small scale development on the grounds of encouraging undesirable ribbon development along the A28 and the development would be unacceptable in terms of access arrangements. Residential development not recommended.	
Recommendations	Not a preferred site.

Site ID	BO13
Site Name	Highlands
Site Assessment	
BO13 is centrally located in the village and within the settlement boundary. The site has easy access to all the main services in the village, and is directly opposite the local bus stop. However, the amenity of adjacent properties, the retention of the public footpath bisecting the site and the presence of a sub-station severely constrains an already small site. The trees within the site are also a constraint to development. It is doubtful that the site would accommodate six dwellings and associated parking onsite.	
Recommendations	Not a preferred site.

Site ID	BO14
Site Name	Reeds Wood, Land at top of Furnace Lane
Site Assessment	
Located outside the existing settlement boundary BO14 is predominately covered by Ancient Woodland and deciduous woodland. Furthermore, records indicate BO14 has BAP habitat status. The loss of woodland cover negates BO14 coming forward as a housing allocation.	
Recommendations	Not a preferred site.

Site ID	BO15
Site Name	Land south of B2089
Site Assessment	
BO15 is detached from the main village and local services and is in a relatively unsustainable location. Development in this location would impact negatively on the character and setting of the village as you approach Broad Oak from the west along Chitcombe Road.	
Recommendations	Not a preferred site.

Appendix 3

Assessed Sites - Options

Site ID	BO16
Site Name	Land East of A28
Site Assessment	
<p>The site has a frontage to the A28 within the existing built-up area, with two adjoining properties in the same ownership, at least one of which would be demolished as part of the development. A new single access point off the A28 Northiam Road would be required to serve both the new dwellings and provide access to proposed allotments. The site extends to the rear to include a relatively narrow strip of open land with well-treed boundaries running behind several properties, as well as the field behind, currently under grass, which is in separate ownership. While the field contributes to the setting of the village, it is visually more related to the adjacent development than the wider Area of Outstanding Natural Beauty.</p> <p>The site should be bought forward as a comprehensive development. A buffer would be required to the Ancient Woodland of Little Austen's Wood immediately to the west. An existing public footpath along the western boundary should be retained and a link provided to it through the development. Trees within the site should be retained as far as possible. Evidence provided by the Council's Open Space, Sport and Recreation Study and discussions with the Parish Council have highlighted the shortfall of allotment provision in this locality, which may be addressed through the provision of allotment on this site. It is an ideal site, in a relatively central location and easy accessibility to the significant majority of the village population.</p> <p>SuDS may also be required in this area to manage surface water flood risk.</p>	
Recommendations	Preferred site (residential and allotments).

Site ID	BO17
Site Name	Land South of Rainbow Trout Pub
Site Assessment	
<p>The rectangular site is located behind the public house the Rainbow Trout has good access to local services and amenities, but is landlocked. However, the recent completion of the adjacent Ostler Field development to the west provides potential access. While BO17 is visually well contained in the wider landscape, additional screen planting along boundaries of the site, especially on the southern boundary, will create a long-term, well-defined boundary.</p>	
Recommendations	Preferred site (residential).

20.5. Villages - Camber

Site ID	CM1
Site Name	Chapel Field, Camber
Site Assessment	
<p>Not suitable for housing. The site is outside of the Camber development boundary and contrary to Policy OSS3. It is within Flood Zones 2 & 3 so development will be subject to a FRA (Policies EN6 and EN7 would be applicable) The north east corner of the site falls within a SSSI (Policy EN5). Part of the south west boundary of the site abuts the SSSI. Two footpaths bisect the site. The south west part of the site falls within a coastal and floodplain grazing marsh. For these reasons the site is considered unsuitable for development.</p>	
Recommendations	Not a preferred site.

Site ID	CM2
Site Name	Former Putting Green Site
Site Assessment	The Former Putting Green site is currently a car park located on Old Lydd Road. The site sits between the recent Royal William Square development with the Rye Bay Café and Dunes bar and restaurant. CM2 is a brownfield site and lies within the existing settlement boundary. It is identified in the adopted Camber SPD as a suitable site to accommodate a mixed use development which would meet part of the housing requirement for Camber up to 2028. The whole of Camber is sited with Flood Zone 3a and no habitable rooms should be accommodated on the ground floor. Care must be taken to develop the site in a sympathetic manner in relation to the surrounding uses and environmental constraints. Further details on the policy framework for CM2 can be found in the adopted Camber SPD (2014).
Recommendations	Preferred site (residential).

Site ID	CM3
Site Name	Land adjoining Cedar Cottage, Draffin Lane, Camber (west side)
Site Assessment	CM3 is sited within the settlement boundary and is a greenfield site off Draffin Lane. Draffin Lane is a private access road and would have to be upgraded significantly to meet highways standards. CM3 is on the fringe of Camber and is poorly related to local services. The whole of Camber lies in Flood Zone 3. The sequential and exception test applies here. Residential development on greenfield sites should be avoided in Flood Zone 3 if viable alternatives can be found elsewhere.
Recommendations	Not a preferred site.

Site ID	CM4
Site Name	Land adjoining Cedar Cottage, Draffin Lane, Camber (east side)
Site Assessment	CM4 is sited within the settlement boundary and is a greenfield site off Draffin Lane. Draffin Lane is a private access road and would have to be upgraded significantly to meet highways standards. CM4 is on the fringe of Camber and is poorly related to local services. The whole of Camber lies in Flood Zone 3. Application of the sequential and exception test is mandatory. Residential development on greenfield sites should be avoided in Flood Zone 3 if viable alternatives can be found elsewhere.
Recommendations	Not a preferred site.

Site ID	CM5
Site Name	Land adjoining Sands End, Farm Lane, Camber
Site Assessment	CM5 is a greenfield site and on the western fringe of Camber nevertheless it is within the existing settlement boundary but is in a peripheral location away from centre of the village. Farm Lane is a private road and access would come off this road between two existing properties. There is an electric sub-station at the entry point into the site which will have to be relocated contributing to expensive onsite infrastructure costs. The whole of Camber lies in Flood Zone 3. The sequential and exception test applies here. Residential development on greenfield sites should be avoided in Flood Zone 3 if viable alternatives can be found elsewhere.
Recommendations	Not a preferred site.

Appendix 3

Assessed Sites - Options

Site ID	CM6
Site Name	Camber Car Park
Site Assessment	
<p>CM6 is identified in the adopted Camber Village SPD, a framework to guide new development at the central car park site. Centrally located in the village, CM6 is well placed to access local amenities and redevelopment of this site accords with this Council's aspirations to move Camber forward as a higher spend family holiday venue all year round, moving beyond the existing offer which is confined to a few months of the year. It is anticipated that housing development on CM6 would be the catalyst to bring further investment into the area. Any proposal should look to retain the overall parking levels (170) with a rebalancing of spaces from the central car park site to the overflow car park, in partnership with ESCC, with a pedestrian link between these strengthened. This would require a minimum of about 30 spaces to remain at the central car park. The majority of the parking spaces are moved to the adjacent overflow car park. There would be a holistic traffic management strategy as part of the redevelopment of this site to manage the traffic congestion in the village during busy periods of year.</p> <p>Furthermore, utmost consideration of flood risk mitigation and the management of recreational pressure on the SSSI sand dunes should be part of the overall planning and implementation process. The site should accommodate overall, housing development, a proportion of commercial space, visitor uses such as serviced and/or self-catered holiday accommodation, parking provision and public space. Key services including police, beach wardens and medical facilities should be retained as part of the overall development proposal. Further details regarding the planning framework for Camber can be found in the Camber Village SPD (2014).</p>	
Recommendations	Preferred site (residential and commercial).

Site ID	CM7
Site Name	Pontins Holiday Centre, New Lydd Road, Camber
Site Assessment	
<p>The site is located within the existing settlement boundary but is currently occupied by a well-established holiday company on a long lease. The 10 ha site abuts the Walland Marsh SSSI to the north and the whole of the village lies within Flood Risk Zones 2 and 3. There is also additional evidence of surface water flooding on-site and within the locality.</p> <p>The change of use from a tourism function to residential would be contrary to Policy EC3 and EC6 of the adopted Core Strategy. The scale of development if this site was released for wholly residential would be out of character/scale for a settlement such as Camber and wholly inappropriate. Such a development would create a significant burden on the existing infrastructure of the village.</p>	
Recommendations	Not a preferred site.

Site ID	CM9
Site Name	Garage, Lydd Road, Camber
Site Assessment	
<p>CM9 is sited within the settlement boundary and is located off Lydd Road. The site was given planning permission for five units in 2011 including some commercial development. The site is centrally located and scores well in sustainability terms. However, it is constrained by existing residential development and there is little scope to increase the number of dwellings on site without having a negative impact on the amenity of adjacent buildings. The former garage has been cleared but has left the site potentially contaminated. CM9 could potentially come forward as a windfall if the site does not accommodate 6 dwellings or above.</p>	
Recommendations	Not a preferred site.

Site ID	CM11
Site Name	Land west of Farm Lane, Camber
Site Assessment	CM11 is located wholly outside the settlement boundary. Part agricultural, part residential and part equestrian development of the site. Consideration of Policy RA2 would apply as retention of key land based economic activities relating to agriculture and supporting recreational facilities are important components of the vision for the Countryside. CM11 is also detached from the centre of the village. The site falls within the flood risk zones 2 & 3 and part of the south west part of the site abuts the SSSI and adjacent to a SAC. Camber Farmhouse (grade II listed) lies some 11.5 metres away from the north east corner of the site. Consideration of impact would also apply through the application of Policy EN2.
Recommendations	Not a preferred site.

20.6. Villages - Catsfield

Site ID	CA3
Site Name	Land at Wilton House
Site Assessment	<p>This large site is currently in equestrian use which adds to rural character and provides for local employment and tourism, which is supported by Core Strategy Policy RA2.</p> <p>Possible impact upon setting of listed buildings to north-west. There is a partial overlap with two archaeological notification areas.</p> <p>On-site access is also, which may negatively affect adjacent streetscape and/or viability. East Sussex County Council Highways Authority raise concerns about existing access onto 'The Green', and the only other readily available option would be via site CA12. Developing this site in addition to the preferred sites CA6 and CA12 for housing would result in an unsustainable level of growth for Catsfield (i.e. up to 80% increase of the village's population in 15 years), considerably in excess of the Core Strategy target and neither appropriate, nor necessary. It would be contrary to Core Strategy Policies OSS1, OSS3, OSS4, OSS5 and RA1.</p>
Recommendations	Not a preferred site.

Site ID	CA4
Site Name	Land off Church Lane
Site Assessment	Less well related to the village core, Church Lane has a comparatively rural character, although the site does have a footway connection. Development of this site would encroach significantly into the open AONB countryside. Contrary to Core Strategy Policies RA1, EN1, OSS1, OSS3, OSS4 and OSS5. Not a suitable development opportunity.
Recommendations	Not a preferred site.

Site ID	CA5
Site Name	Land adjacent to Park Gate Bungalows, Catsfield
Site Assessment	Development at this location would be far removed from the village. As such, it would be out of keeping with the prevailing rural character and have an unacceptable impact on Area of Outstanding Natural Beauty and rural landscape. There is a pond on site and a public footpath sub-dividing the site.

Appendix 3

Assessed Sites - Options

The lack of footways exacerbates the site's relative isolation by inhibiting pedestrian access. Issues with Core Strategy Policies RA1, EN1, OSS1, OSS3, OSS4, OSS5, EN1 and TR3.

Recommendations Not a preferred site.

Site ID CA6

Site Name Land South of Skinners Lane

Site Assessment

A residential frontage scheme would be in line with prevailing character of immediate vicinity, as well as limiting landscape impacts and impacts upon neighbouring amenities. Design should seek to retain integrity of hedgerows as much as possible (i.e. via shared access point(s)). New hedgerow planting would be required at rear (south) of scheme to mitigate any partial loss of frontage hedgerow, habitat ideally connecting down the east boundary to provide screening for neighbour.

Lack of mains sewerage needs to be addressed.

Parking required on-site in order to minimise on-street parking problems. SuDS required on site and at low-lying frontage and due to location on the periphery of the Pevensy Levels hydrological catchment area. Ideally, a vehicle access should be retained to the field off-site to the south to enable its continued usage.

Recommendations Preferred site (residential).

Site ID CA7

Site Name Land at the Warren Yard, Catsfield Road

Site Assessment

Partial residential permission, largely justified as enabling development for continued viability of existing commercial use. Core Strategy policy EC3 continues to apply.

Not a preferred site for further residential development. Too far from development boundary and too poorly related to Catsfield village to be considered for a full residential allocation (notwithstanding existing permission for enabling development).

Pedestrian access to nearest settlements is not only prohibitively far, but potentially unsafe along the winding B2204 which has no footways, nor safe shelter from vehicles. The alternative option of walking along an unlit public footpath in open countryside would be unsuitable for all users and daylight/seasonally dependent.

Recommendations Not a preferred site.

Site ID CA8

Site Name The Brooks, Church Road

Site Assessment

A very large site that due to its sheer scale would not be appropriate in its entirety as it would represent a disproportionate level of growth for the settlement.

Development would have a detrimental visual impact and cause harm to the rural setting and landscape character of the village. Surface water flooding issues are present and the site is crossed by streams. Contrary to Core Strategy Policies OSS1, OSS3, OSS4, OSS5, RA1, EN1, EN7. Not a preferred site.

Recommendations Not a preferred site.

Site ID	CA10
Site Name	Land between Park Gate Bungalows and Ivy House
Site Assessment	Not a preferred site. Further development extending from village centre and relatively poorly related to development boundary and built form of the village. Loss of mature trees would be detrimental to the local environment. Suitable for protection/enhancement as publicly accessible natural greenspace. Conflict with Core Strategy policies EN5 (Biodiversity and Greenspace), OSS3 (Use of Development Boundaries), OSS4 (Location of Development), OSS5 (General Development Considerations).
Recommendations	Not a preferred site.

Site ID	CA11
Site Name	Land opposite the Primary School
Site Assessment	Not a preferred site. Development on this site would extend into open countryside AONB in an area comparatively remote from the village core and services.
Recommendations	Not a preferred site.

Site ID	CA12
Site Name	Land rear and adjacent White Hart pub
Site Assessment	<p>Ideally situated on unused land that is adjacent to village services (shop and public house) and the bus stop.</p> <p>Although within the AONB, the site is well contained and screened from the wider landscape, although reinforced buffer planting would be required.</p> <p>Vehicle access would be via the Green/B2204. Its position is partially dictated by the presence of the existing pedestrian crossing, needing to be further north for safety reasons and to avoid conflict of movement. Pedestrian access site should connect also connect to the 1066 Country Walk in the south-west corner of the site.</p> <p>The shortage of amenity open space in the village may be addressed by some provision alongside development. The south-eastern frontage lends itself to the creation of a central green for the village, providing a potential location for small-scale community events. Locating the green here would have additional benefits of complementing the setting for the adjacent White Hart pub (which is a grade 2 Listed Building) as well as being adjacent to the pedestrian crossing. In terms of future design it should benefit from the passive surveillance of residential properties fronting onto it.</p> <p>The lack of gas supply suggests renewable energy options (solar, ground source heat pumps) may be a particularly appropriate option here.</p> <p>Given that the adjacent B2204 has a poor accident record, provision of some street lighting and/or improved road markings may be necessary to meet highway safety requirements; this should be investigated with the Highway Authority.</p> <p>The historic field boundaries should be retained and would benefit from reinforced buffer planting of appropriate native species, as informed by an ecological survey.</p>
Recommendations	Preferred site (residential and village green).

Appendix 3

Assessed Sites - Options

20.7. Villages - Guestling Green

Site ID	GU4
Site Name	Land at former highway depot, Guestling Green
Site Assessment	
<p>The site is an existing highways depot owned by East Sussex County Council, but identified as surplus to requirements.</p> <p>This brownfield site is level and well screened from public view by the existing hedging. Although the site is physically separate from the built-up area boundary of the village, it is visually well contained within the ribbon development along Chapel Lane. However, the site would benefit from some additional screening to its eastern boundary (there are some views to the north and east). The site is located within the High Weald AONB.</p> <p>There would be limited impact on neighbouring amenities and the site is located relatively close to an existing bus route on the A259 (although there is no footway along Chapel Lane to the site). Whilst Guestling Green is not identified as a particularly sustainable location for development (the site is not particularly well located for access to many key services) Government policy focuses on the re-use of brownfield sites for alternative uses.</p> <p>There is an existing suitable access point off Chapel Lane but this is narrow, while on-street parking, especially at school drop-off and pick-up times, makes it difficult for vehicles to manoeuvre along the road, particularly for larger vehicles.</p> <p>The existing doctor's surgery at Guestling Green has been identified by the Care Quality Commission as in need of modernisation. In response to this, the surgery has been looking for an alternative site for a relocated and expanded facility within the village. Guestling Green Highway Depot is considered as a suitable site for such a facility. The surgery has also identified the possibility for an 'intermediate care facility' adjacent to the site to provide care for those patients who no longer require hospital care but are unable to immediately care for themselves at home.</p>	
Recommendations	Preferred site (doctors surgery and intermediate care facility).

20.8. Villages - Hurst Green

Site ID	HG2
Site Name	Land to the Rear of Ridgeway
Site Assessment	
<p>The site is regenerated woodland and now effectively forms part of Burgh Wood, a large woodland situated on the edge of Hurst Green (much of it Ancient Woodland), on land which slopes down to a stream. The wood is a designated SNCI, criss-crossed by footpaths that are enjoyed by local people. Whilst this site is not within the SNCI or defined Ancient Woodland, in practical terms the land is subject to natural restoration and re-colonisation by neighbouring woodland, including by English Oak, Hawthorn and Rowan. It is also defined BAP Habitat deciduous woodland. As such, its development would bring it into conflict with policy Core Strategy EN5 in particular. Access presents a further difficulty and would require either a loss of a property or loss of garages.</p>	
Recommendations	Not a preferred site.

Site ID	HG4 & HG5
Site Name	Land South of playing field and South of village hall, Hurst Green
Site Assessment	Well contained from the wider landscape, and well related to village services. However, access is problematic and development is ruled out by ESCC Highways advice (Policy TR3). The site also has mature tree coverage and setting of listed building issues. May offer scope for extended open space, subject to owner aspirations.
Recommendations	Not a preferred site.

Site ID	HG6
Site Name	Land South of Lodge Farm
Site Assessment	<p>A medieval historic field boundary and cohesive 'assart', with associated historic farmstead off-site to the north.</p> <p>The site reads as part of wider landscape and development would extend the village edge significantly northward. Landscape issues - views out of site northwards. The footpath south of the site acts as a natural village boundary at this point.</p> <p>It is also adjacent to the SNCI and Ancient Woodland which would require mitigation, as well as having Listed Buildings and buildings of architectural value at the boundaries, which would require similar consideration.</p> <p>Highways England has indicated it is against its policy to create a new access to the A21 for safety/ capacity reasons and they would prefer development of sites that utilise an existing access. Alternative access points have multiple ownership issues.</p>
Recommendations	Not a preferred site.

Site ID	HG9
Site Name	Land at Yew Tree Farm, Hurst Green
Site Assessment	Wholly rural area relating to the wider landscape. Forms part of valley side to the east of village and of the rural setting of the settlement, criss-crossed by historic Area of Outstanding Natural Beauty field boundaries. Issues with Core Strategy Policies OSS1, OSS4, OSS5, RA1, EN1, EN5 and possibly TR3.
Recommendations	Not a preferred site.

Site ID	HG11
Site Name	Land adjacent to the White House, Burgh Hill
Site Assessment	This ridge-top site is exposed within the wider Area of Outstanding Natural Beauty countryside. The loss of the green gap at this fringe location would also be a negative outcome. The site is comparatively remote from the village core services (more so since the relocation of Etchingham Primary School) and its poor accessibility is exacerbated by incomplete footway connections to the village core.
Recommendations	Not a preferred site.

Appendix 3

Assessed Sites - Options

Site ID	HG17
Site Name	Caravan Tech Site
Site Assessment	
<p>A brownfield caravan sales site. It would only become available in the event of the current occupier successfully relocating. The nature of the existing retailer is such that it clearly serves a much wider than village-scale market, benefitting from an A21 location. An alternative, potentially more intensive retail use would likely impact on neighbouring amenities. Similarly, a business use could also be a poor neighbour. While a B1 could be considered, recent attempts to let a B1 office at a nearby mixed-use site (113 London Road) were unsuccessful and the unit remained vacant for several years before converting to residential (RR/2015/320/PN3).</p> <p>The character of the immediate surroundings is residential and the site is slightly separated from retail uses further north in the village core, which have themselves struggled to retain occupancy. The site is centrally located to access local services by foot, including the primary school, local shops/services and village hall.</p> <p>The site is already reasonably well screened from the surrounding Area of Outstanding Natural Beauty countryside to the west by existing trees.</p> <p>Hence, the site is most suited to residential use if no longer required by the existing occupier.</p>	
Recommendations	Preferred site (residential).

Site ID	HG18
Site Name	Land off Foundry Close
Site Assessment	
<p>The site is relatively well contained from view across the wider High Weald Area of Outstanding Natural Beauty countryside to the east, due to well treed boundaries, and there is potential to reinforce boundaries if necessary.</p> <p>There is an existing vehicle access via Foundry Close, suitable to access the wider site. The site benefits from being located within walking distance of all key village services, including convenience shops, primary school and village hall. It is also adjacent to a large recreation to the south ground (Drewett Field), which potentially offers an adjacent amenity. The site is connected to footpaths at the northern and southern edge that potentially improve pedestrian accessibility. While the A21 has some severance effect, a pelican crossing is already in place opposite the southern end of the site.</p> <p>The stream/ditch that sub-divides the two lower fields is a key character feature and also a High Weald AONB 'historic field boundary'. It should be retained for both heritage and ecological purposes (in accordance with Core Strategy Policies EN5, EN1 and EN2), as should the historic field boundary to the east.</p>	
Recommendations	Preferred site (residential).

20.9. Villages - Iden

Site ID	ID1a
Site Name	Land South of Elmsmead
Site Assessment	
<p>The site is relatively central to the village and close to local amenities (Policy RA1). Development of ID1a would contribute to an affordable housing need identified by the Parish. The site equates to approx. 0.6 hectares. Listed buildings on the east and south eastern boundary known as 'Conkers' and 'East View' respectively. Both listed buildings and their settings are important to the character of the village and should be retained (Policy EN2). Care should be taken to respect the amenity value and setting of adjoining properties (Policy OSS5) and would impact on the net developable area that can be achieved. Access would be delivered off Elmsmead, subject to an agreement with the landowner, rather than Main Street, which would protect the setting of the Listed Buildings.</p>	
Recommendations	Preferred site (residential).

Site ID	ID1r
Site Name	Land rear of Conkers, Main Street
Site Assessment	
<p>This site lies immediately behind the Listed 'Conkers'. It forms the southern part of a paddock; the northern part being site reference ID1a. This part of the field has a closer relationship with the listed buildings. The creation of a new access road to the land from Main Street alongside the listed buildings would be clearly detrimental to their setting. Its development would represent an unnecessary and inappropriate loss of open land that contributes both to the setting of listed buildings and to the character of this rural fringe of the village.</p>	
Recommendations	Not a preferred site.

Site ID	ID2
Site Name	Land adjacent to Meadow View, Main Street
Site Assessment	
<p>Located centrally in the village, east of Main Street. The site is well placed to access all local services including wider local transport links. The site currently abuts the existing settlement boundary. The historic village has a strong sense of place and the rural setting of the village is important. Long views east of the site are extensive and development here would encroach negatively into the wider AONB landscape.</p>	
Recommendations	Not a preferred site.

Site ID	ID3
Site Name	Land at Grove Farm, Iden
Site Assessment	
<p>Edge of village site outside the existing settlement boundary. ID3 comprises both sides of Grove Lane and is located outside the existing development boundary at the end of Grove Lane. To the north of Grove Lane, ID3 comprises of an operational Equestrian Centre. To the south of Grove Lane ID3 comprises of three dwellings. A Listed Building is sited adjacent to the western boundary. An historic pond is located in the south-eastern corner. Amenity of adjacent properties could be impacted with further intensification of development at ID3. The equestrian centre is a key rural activity and should be retained as an important contributor to the rural economy. Grove Lane would require a significant upgrade to improve capacity for vehicular and pedestrian traffic.</p>	
Recommendations	Not a preferred site.

Appendix 3

Assessed Sites - Options

Site ID	ID4
Site Name	Land North of Iden Coach House
Site Assessment	Greenfield site but well screened from public highway. Detached from the settlement boundary and the village and scores relatively poorly in terms of proximity to local village facilities and services. Linear growth of the village along Wittersham Road is not supported. Further intensification of development would negatively impact on the character and rural setting of the village as you approach from the north.
Recommendations	Not a preferred site.

Site ID	ID5
Site Name	Land at Herring Cottages
Site Assessment	The site is located outside the existing settlement boundary and detached from the main settlement pattern of the village. The area is rural in character with a strong sense of place. Hedgerows along Wittersham Road are prominent feature of the landscape. Development at ID5 would constitute linear development along Wittersham Road creating addition development pressure. Intensification of development here would alter the setting of the village from the north and negatively impact on the High Weald AONB landscape.
Recommendations	Not a preferred site.

Site ID	ID6
Site Name	Land at Orchard Farm
Site Assessment	ID6 is located outside the existing settlement boundary in an unsustainable location and detached from main body of the village. ID6 is a brownfield site but currently occupied for employment purposes. The loss of employment would be resisted here. Development here would contribute to unsustainable development pressure along Wittersham Road while the existing buildings are prominent in the open countryside especially to the west. Planning history also indicates this site was refused as housing proposal as recently as 2011.
Recommendations	Not a preferred site.

Site ID	ID7
Site Name	Land at Idenfield Farm
Site Assessment	The site lies outside the existing settlement boundary and approximately 700 metres to the north of Iden. There is a strong sense of place with existing field patterns and prominent hedgerows evident. The site remains a functioning farm and development here would be contrary to RA2(i) which seeks to maintain the farming capacity of the district identified as an important part of the rural economy as well as integral to the character of the High Weald. Again the Core Strategy would seek to retain employment sites through Policy EC3. Development here would impact negatively on the wider Area of Outstanding Natural Beauty landscape and views from the public highway are also prominent.
Recommendations	Not a preferred site.

Site ID	ID8
Site Name	Land off Wittersham Road, Iden
Site Assessment	The site is a greenfield parcel of land, located outside the existing settlement boundary and is approximately 800 metres north of the village fringe. The site is in an unsustainable location and does not relate well to the existing village edge. Currently there is no pedestrian footpath back to the village from this location and would require investment in extending the existing footway. Set in the open countryside the visual impact of development here would be to the detriment to the AONB landscape. Furthermore the rural setting of Grade II listed Oxenbridge Farmhouse opposite the ID8 would also be negatively impacted.
Recommendations	Not a preferred site.

20.10. Villages - Northiam

Site ID	NO3
Site Name	Coppards Lane Industrial Estate
Site Assessment	NO3 is an important local employment estate with several occupiers currently in operation. The land gently falls from north to south within the Area of Outstanding Natural Beauty. Relatively distant from the main village, it is not accessible to local amenities and services. NO3 should be retained for employment purposes as Northiam is identified in the Core Strategy as a Local Service Centre and employment is necessary to support the vitality of the village. Having regard to its local role, redevelopment of the employment area for housing only would be contrary to Policy EC3.
Recommendations	Not a preferred site.

Site ID	NO4
Site Name	A H S Limited, Coppards Lane, Northiam
Site Assessment	NO4 is located north of Coppards Land Industrial Estate on the north east fringe of Northiam and is currently in use as an employment site within the Area of Outstanding Natural Beauty. As with NO3, it should be retained for employment purposes. Furthermore, NO4 poorly relates to the village core, making it relatively distant from many of the amenities of the village.
Recommendations	Not a preferred site.

Site ID	NO5
Site Name	Land at Timber Lodge, Northiam
Site Assessment	NO5 is sited within the existing settlement boundary and consists of an existing property fronting onto Station Road and its associated backland. A pond is located in the front of the property which should be retained as a distinctive feature; consequently, adequate access arrangements may not be achievable. The existing residential property contributes to a strong building line of low density dwellings. Further intensification of housing here would be at odds with the general streetscape character.
Recommendations	Not a preferred site.

Appendix 3

Assessed Sites - Options

Site ID	NO7
Site Name	Land at Friars Cote Farm Buildings, Northiam
Site Assessment	NO7 is located outside the settlement boundary and within the Area of Outstanding Natural Beauty (AONB) on a prominent ridge of Ancient Woodland to the north which would impact on any potential housing proposal. Redundant farm buildings will require further investigation but loss of agricultural buildings is generally resisted under Core Strategy Policy RA4. Poor access via a single unmade track will require significant upgrading to improve capacity. Furthermore, development of NO7 would be exposed in the wider AONB landscape and harm the character and setting of the village.
Recommendations	Not a preferred site.

Site ID	NO8
Site Name	Land at Friars Cote Farm Field, Northiam
Site Assessment	NO8 is located outside the settlement boundary and within the Area of Outstanding Natural Beauty (AONB). NO8 is relatively distant from the village's main amenities and services in comparison to other sites. Development on the exposed slopes of NO8 would harm the integrity of the AONB landscape as well as the attractive setting of this part of the village; hence, it should be resisted. Gill woodland identified to the north.
Recommendations	Not a preferred site.

Site ID	NO9
Site Name	Land east of Frewen College, Northiam
Site Assessment	Located outside the settlement boundary and within the Area of Outstanding Natural Beauty. Adjacent to B2068 but far removed from the main core of Northiam, local amenities and services, NO9 is sited in an unsustainable location and therefore development of NO9 should be resisted.
Recommendations	Not a preferred site.

Site ID	NO11
Site Name	Land east of Hayes Plat, Northiam
Site Assessment	Large rural area adjacent to B2068 to the south of Northiam and outside the settlement boundary (Policy OSS3). The western end of NO11 is the high point and the landform gently descends to south and east. There are several species of trees (including oak, lime and sycamore) scattered across site at field boundary but significant Ancient Woodland located to the north and east of the site as well as several ponds located within the site boundary. The western end abuts the village fringe but it is also the most exposed part of the site and therefore development should be resisted here. The impact on the wider Area of Outstanding Natural Beauty landscape would be unacceptable.
Recommendations	Not a preferred site.

Site ID	NO14
Site Name	Land at Newlands, Northiam
Site Assessment	Located off Dixters Lane NO14 lies outside the settlement boundary and within the Area of Outstanding Natural Beauty. The boundaries are well screened by a thick tree belt. Dixters Lane could provide access although an alternative would be Crockers Lane, albeit this is a single unmade track and will have to be upgraded to make it acceptable in Highways terms. The site is more elevated in the landscape than other parts of Northiam, which together with limited access, makes significant residential development here inappropriate.
Recommendations	Not a preferred site.

Site ID	NO15
Site Name	Land South of Northiam C of E Primary School
Site Assessment	<p>NO15 is sited south of the existing primary school but abuts the southern urban fringe of Northiam and the existing settlement boundary. NO15 is well enclosed and well related to the form of the village. The site is readily accessible by foot to local amenities, including the local school, dentist and local church. It abuts the Conservation Area and care should be taken to respect its character and appearance. Highways advice stipulates access can be achieved off the A28 where site lines are good. Also, given its close proximity to the school and nearby junction, there is a requirement to undertake a safety audit and to ensure suitable sight lines are achieved.</p> <p>Any proposal should respect the amenity of the existing property to the south. The frontage of the site is characterised by a tree belt with three notable Oak specimens with all three benefiting from Tree Preservation Order status. This should be retained as it contributes to the setting of the rural approach to this part of the village. Similarly, there are two Oak trees to the rear of the site which also benefit from protected status, which should also be retained. A suitable buffer zone would be required to protect the tree roots of all protected trees within the site. Any site layout should be informed by a comprehensive tree survey and should avoid undue overshadowing from the trees.</p>
Recommendations	Preferred site (residential).

Site ID	NO16
Site Name	Land rear of Swallows, Main street, Northiam
Site Assessment	Right of Way (footpath) crosses close to East boundary and the site abuts the existing Conservation Area. NO16 sits within the Area of Outstanding Natural Beauty (AONB) and outside the settlement boundary but is centrally located behind existing properties fronting onto Main Street (one of which is listed) as well as adjacent to the Conservation Area Access could be delivered off Fullers Lane but would require upgrading to improve capacity. Given the strong sense of place and rural character in this part of village fringe landscape, with extensive views to the east, development here would impact on the AONB setting of the village.
Recommendations	Not a preferred site.

Appendix 3

Assessed Sites - Options

Site ID	NO18
Site Name	Land adjacent to Little Haven, Station Road
Site Assessment	NO18 is located to the northeast of the Northiam within the Area of Outstanding Natural Beauty (AONB) and relates poorly to the centre of the village. Development at NO18 would impact negatively on the wider AONB landscape. Goddard industrial estate is located to the east while the sewage works abuts the southern boundary of NO18.
Recommendations	Not a preferred site.

Site ID	NO19s/NO19E/NO19N
Site Name	Blue Cross Animal Hospital
Site Assessment	NO19N/NO19E/NO19S would all be considered together as a comprehensive development. However there are significant access issues attached with this location. Beales Lane is a historic routeway and would be difficult to upgrade to an appropriate standard. Further access options to the north and south are constrained by poor visibility or the requirement to remove a property within a Conservation Area in order to have a sufficient, safe viable vehicular access. Regard should be given to the close proximity of NO19S/NO19/NO19S next to the Conservation Area and a number of listed buildings. Furthermore, views to the east from the site are also extensive and development would impact negatively on the wider Area of Outstanding Natural Beauty landscape. Therefore, development of this area is regarded as unwarranted and inappropriate.
Recommendations	Not a preferred site.

Site ID	NO20
Site Name	Ballards, Station Road, Northiam
Site Assessment	Located to the north of Northiam, NO20 is detached from the village fringe and relates poorly in terms of local services. Located in the wider Area of Outstanding Natural Beauty landscape, development should be resisted.
Recommendations	Not a preferred site.

Site ID	NO21
Site Name	Muddy Duck Restaurant
Site Assessment	This site is a former pub/restaurant, is listed and sits within the Conservation Area in the centre of the village. Comprehensive redevelopment of the site would also require the demolition of an existing Listed Building also harming the integrity of the Conservation Area, and should be resisted.
Recommendations	Not a preferred site.

Site ID	NO22
Site Name	Goddens Gill Amenity Area
Site Assessment	Partially within the settlement boundary. NO22 is a well-established open space serving the local community. The loss of NO22 for housing would be contrary to Core Strategy policy. NO22 is identified in the Open Space and Recreation Study and it meets a requirement for recreational open provision for the village. Development here should be resisted.
Recommendations	Not a preferred site.

Site ID	NO25
Site Name	Land rear of Coplands, Dixter Lane
Site Assessment	The site is located on the north west fringe of the village and outside the existing settlement boundary. NO25 sits on the exposed upper slopes of the valley side north of Northiam. The exposed nature of the locality precludes it from further consideration as a housing allocation because of the impact on the wider Area of Outstanding Natural Beauty landscape.
Recommendations	Not a preferred site.

20.11. Villages - Peasmarsh

Site ID	PS3
Site Name	Land at Tanyard Field
Site Assessment	PS3 is located outside the settlement boundary and at the south-eastern end of the village relatively distant from main village services, particularly the supermarket. Rising ground and visible from the A268. East Sussex County Council's landscape assessment stipulates this part of the village is more open countryside and integral to the overall setting of the village. Local consultation has indicated possible issues with surface water flooding (Policy EN7) in this locality. Other sites are considered preferable.
Recommendations	Not a preferred site.

Site ID	PS4
Site Name	Land at Old House Paddock
Site Assessment	Informal paddock area, well removed from the existing development boundary and the majority of village services (with the exception of the supermarket). Situated on rising Area of Outstanding Natural Beauty countryside in close proximity to listed buildings, the area is of more rural character.
Recommendations	Not a preferred site.

Appendix 3

Assessed Sites - Options

Site ID	PS5
Site Name	Land north east of Tanhouse
Site Assessment	A sloping pasture bounded by a stream and historic field boundary. Although adjacent to the supermarket and bus service, it is further from other village services and is accessed via a narrow, hedgerow-lined country lane. It is exposed above across low lying and attractive High Weald Area of Outstanding Natural Beauty (AONB) countryside to the west, which is typified by medieval field patterns. The topography is such that the site feels remote from the main built-up area of the village. Development would have a negative impact on rural AONB character.
Recommendations	Not a preferred site.

Site ID	PS6
Site Name	Land adjacent to Superstore - South East
Site Assessment	Pastoral land that is currently only accessible via other sites which have been rejected, so not feasible. In any event, despite being adjacent to the supermarket, the site reads more as part of the wider countryside. The site is on higher ground relative to the wider landscape and consequently is exposed to wider views across Area of Outstanding Natural Beauty countryside, particularly from southern sections. Bounded by a public footpath on its southern boundary. Overall there are negative impacts in terms of both landscape and rural character.
Recommendations	Not a preferred site.

Site ID	PS7N
Site Name	Land at Oaklands, Main Street
Site Assessment	A centrally located site that is visually contained from wider Area of Outstanding Natural Beauty (AONB) countryside, although development may have a negative impact on adjacent tourist uses. Vehicular access is problematic for a combination of reasons. There is a highway safety issue in the general vicinity as sight lines seem unlikely to be achievable due to the topography of the highway to the west. In addition, a pond (A BAP priority habitat and High Weald AONB character feature) is located adjacent to Main Street which is an obstacle directly and in terms of adverse impact via run-off, as well as being directly adjacent another access. Alternative access options are limited. Via third party land at the Main Street frontage would impact upon neighbouring uses, whilst access across greenfield land to the south requires third party land and/or would have a landscape impact.
Recommendations	Not a preferred site.

Site ID	PS7S
Site Name	Land south of Oaklands, Main Street
Site Assessment	Only accessible via other sites. Adjacent to and crossed by, public footpaths. Notwithstanding this, there is a relative lack of integration with the existing village form at this location. The site reads more as wider countryside and has some landscape impact.
Recommendations	Not a preferred site.

Site ID	PS10
Site Name	Land to the rear of the Cock Horse Inn, Main Street
Site Assessment	
<p>The site is a caravan park which serves an existing tourist function. There is a Core Strategy presumption against loss in tourism accommodation and considered to be a vital part of the local economy, therefore its loss would be contrary to CS Policy EC6.</p> <p>Site PS10 is also characteristic of the Area of Outstanding Natural Beauty. Development of the western section in particular would appear imposing and incongruous in the wider landscape due to the elevated nature of the site relative to its surroundings.</p>	
Recommendations	Not a preferred site.

Site ID	PS11
Site Name	Land east of Sharvels Farm House, Main Street
Site Assessment	
<p>The site is located outside the settlement boundary and within the Area of Outstanding Natural Beauty (AONB). Currently, private parkland/pastoral with tennis court used as extended domestic curtilage of Woodside, a large Grade II dwelling to the east. The landowner is not promoting the site. The site, particularly on the southern side, is also reasonably well screened from the wider AONB. However, northern sections of the site relate more to the wider countryside and are rural in character.</p> <p>The A268 abuts the southern boundary but the site is well screened from the road. It is located in comparatively good proximity to the main services, being directly opposite the supermarket and near the local pub. However, the A268, which has 40mph limit at this point, has some severance effect. There is no adjacent footway and works would be required to improve pedestrian access. Access and associated works would require some hedgerow and possibly tree loss. The site abuts a public right of way located to the west. There is an indication of surface water flood on the western boundary and a tertiary river is situated just west of the site.</p>	
Recommendations	Not a preferred site.

Site ID	PS12
Site Name	Gideon Platt, Tanhouse Lane
Site Assessment	
<p>Although located adjacent to the supermarket, petrol station and bus route, the site is somewhat detached from existing settlement boundary, with some landscape impact to the south. There is a stream crossing the site and surface water flood risk is extensive. The site is detached from the main village and outside the settlement boundary development here would be contrary to Policies OSS3, OSS4 and Policy RA1 contributing to ribbon development and extension of urban character.</p>	
Recommendations	Not a preferred site.

Site ID	PS14
Site Name	Land east of Woodside Barn
Site Assessment	
<p>Separated from the village to the north of the A268, and lacking footways and crossing points.</p>	

Appendix 3

Assessed Sites - Options

Rural in character and effectively part of the parkland setting of listed Woodside House. East Sussex County's Landscape Assessment stipulates there is 'low' capacity here to accept significant housing within this part of the village landscape. Southern part of the site is subject to long distance views across the Area of Outstanding Natural Beauty to the north.

Majority of site is free from flood risk, although there is a central surface water flow path. Development would represent an unnecessary intrusion into the wider countryside.

Recommendations	Not a preferred site.
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Site ID	PS15
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Site Name	Land north of Leyland Cottage, Main Street
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Site Assessment

Rural in character, wooded on site and/or abutted by woodland.

It is relatively centrally placed within the village to access services and facilities, although the A268 lacks footways and crossing points.

Much of the site is Ancient Woodland, with only a small portion on the western side being clear of trees, although this area is still abutted and constrained by Ancient Woodland on two sides, also a historic field boundary. Actual developable area would be constrained on all sides by root protection areas.

While the site is fairly well contained and abuts the existing development boundary, the County's Landscape Assessment stipulates there is 'low' capacity here to accept housing development within this part of the village landscape. Development is neither necessary nor appropriate and other sites within the village are preferable.

Recommendations	Not a preferred site.
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Site ID	PS17
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Site Name	Land west of Mendips
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Site Assessment

PS17 is located well outside the settlement boundary and reads as part of the wider Area of Outstanding Natural Beauty (AONB) rural landscape. Policy OSS3 and Policy EN1 are applicable. Ancient Woodland is located to the south of PS17 (Policy EN5). Inadequate access capacity via School Lane to support increase volume of vehicular traffic, it would require an upgrade to accommodate significant development (Policy TR3 would be applicable). Vehicle access not possible from north due to the location of a traditional orchard covered by Tree Preservation Orders. In addition, the field boundaries have been identified as part of a network of historic field boundaries and are integral to the character of the AONB. Policy EN1 is applicable.

However, the site offers scope to improve pedestrian connectivity at a village scale.

Recommendations	Not a preferred site.
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Site ID	PS18
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Site Name	Land at Stream Farm, Main Street
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Site Assessment

Surface water flooding risk across much of the site, including at likely access points abutting the stream.

Access from either Farm Gardens or A268 likely to result in loss of trees/vegetation and further culverting of stream. Raises issues with Core Strategy Policy EN5.

Abuts two listed buildings, with associated setting issues (Core Strategy Policy EN2).	
Recommendations	Not a preferred site.

Site ID	PS20
Site Name	Land rear of Welbeck, Main Street
Site Assessment	
Residential backland site located within the settlement boundary and close to existing services. Based on Highways Authority advice, it is unlikely to be necessary to include this land in order to facilitate development of land to south.	
Multiple ownerships of PS20 limit deliverability, particularly as the site would need to come forward in its entirety to avoid possible impacts on neighbouring amenities.	
Recommendations	Not a preferred site.

Site ID	PS22
Site Name	Kings Head Land, Tanhouse Lane
Site Assessment	
PS22 consists of pasture located outside the settlement boundary. It is detached from the village fringe although close to the supermarket. There is a strong sense of place as the land rises east to west in open countryside. East Sussex County Council's Landscape Assessment stipulates there is 'low' capacity here to accept significant housing within this part of the village landscape. Development here would also sub-divide a High Weald Area of Outstanding Natural Beauty historic field boundary. The site is a former traditional orchard and Sussex Wildlife Trust cites the likelihood of continued biodiversity value as a legacy of its former use. There are surface water flooding issues across the site, particularly to north-east and at point of likely access, with a tertiary river stream on NE boundary.	
Recommendations	Not a preferred site.

Site ID	PS24
Site Name	Land to the rear of Main Street
Site Assessment	
Originally considered as separate northern and southern areas, taken as a whole the site offers an opportunity to meet the needs of the village in a central location. Northern sections of the site, adjacent to the existing development boundary lend themselves to residential provision, being particularly well screened from the wider High Weald Area of Outstanding Natural Beauty (AONB) countryside, as well as centrally located within the village to access most services comfortably by foot. In terms of vehicular access, the Highways Authority has accepted it is achievable 'in principle' via 'Pippins', although this will require a priority solution for a short distance at the rear of the curtilage.	
To the south, the land has a rising topography and more rural and secluded character. A traditional orchard is situated on the slopes (which is both a Biodiversity Action Plan Priority Habitat and also a character feature of the High Weald AONB), although it no longer serves as its original function and is deteriorating in quality.	
Taken as a whole, the site has scope for wider village benefits by improved pedestrian linkages connecting to the school and Main Street; as well as ensuring the preservation of High Weald AONB character features and providing additional open space for the village.	
Recommendations	Preferred site (residential - northern section, open space - southern section).

Appendix 3

Assessed Sites - Options

Site ID	PS25
Site Name	Land between Farleys Way and School Lane
Site Assessment	Within the settlement boundary but an isolated greenfield site located in backlands of residential properties. No obvious vehicular access. School Lane is unsuitable for increased number of vehicles and has no footways. Access via Farley Lane would have a detrimental impact on neighbouring amenities, particularly to serve a significant number of vehicles. Access from the west would not be environmentally acceptable leading to the loss of mature trees as well as two High Weald Area of Outstanding Natural Beauty field boundaries. Scope is generally limited by proximity of neighbouring curtilages and trees.
Recommendations	Not a preferred site.

20.12. Villages - Rye Harbour

Site ID	RH2
Site Name	Land at the Saltings
Site Assessment	Recent permissions for B1/B8 uses negate further consideration for residential. This site is not suitable for residential given the commercial uses in that locality and that site is within the identified 2006 Local Plan employment area. Residential development is not appropriate here given the incompatibility with adjacent commercial land uses. RH2 is suitable for employment/commercial uses.
Recommendations	Preferred site (employment).

Site ID	RH3
Site Name	Land adjacent to Rye Waste Water Treatment Works, Harbour Road
Site Assessment	Not suitable for residential given the heavy industry surrounding and that site is within the identified employment area. Residential development is not appropriate here given the incompatibility with adjacent commercial land uses. RH3 is suitable for employment/commercial uses.
Recommendations	Preferred site (employment).

Site ID	RH4
Site Name	Land south of Churchfields, Harbour Road
Site Assessment	Site is not suitable for residential development as poorly related to Harbour Village residential area. There are considerable environmental constraints attached with the site. RH4 lies within the Rye Harbour SSSI and is within Flood Zone 3. Furthermore, suitable access arrangements to Harbour Road would have to traverse the former Churchfield Industrial Estate. Not suitable for residential or employment uses.
Recommendations	Not a preferred site.

Site ID	RH5
Site Name	Land east of Churchfields, Harbour Road
Site Assessment	RH5 is not considered suitable for residential as it currently lies within the existing 2006 Local Plan designated employment area and not well related to residential area of Harbour Village. The Rye Harbour SSSI also abuts the eastern and southern boundary of RH5 site. Residential development is not appropriate here given the incompatibility with adjacent commercial land uses. However further employment uses is appropriate at this location.
Recommendations	Preferred site (employment).

Site ID	RH6
Site Name	Land south of former ARC spun concrete site, Harbour Road, Rye Harbour
Site Assessment	RH6 is a greenfield site located within Flood Zone 3 as well as the Rye Harbour SSSI. It is also poorly related to the existing Harbour Village residential area. The environmental constraints attached with the site preclude it from further consideration as a housing site or employment use.
Recommendations	Not a preferred site.

Site ID	RH7
Site Name	Land at Frenchman's Beach Caravan Park, Rye Harbour
Site Assessment	RH7 abuts the existing settlement boundary but there are significant environmental constraints to consider at this location including flood risk and the potential impact on the adjacent SSSI, RAMSAR and SPA designations. The setting of the Martello tower (Grade II Listed) would also be a further constraint to a significant quantum of development here. Furthermore, the existing holiday and caravan park is a significant driver of the local economy here and its redevelopment as a housing site would be contrary to existing Core Strategy policy to retain important local employment/tourism sites.
Recommendations	Not a preferred site.

Site ID	RH10
Site Name	Land at Stone Cottages, Rye Harbour
Site Assessment	RH10 comprises two brownfield parcels of land. The front of the site (0.52 Hectares) is an allocated site from the 2006 Local Plan for a minimum of 18 dwellings. The allocation is situated on Harbour Road within the existing development boundary for Rye Harbour village and adjacent to existing residential development to the east. It is currently in low-key employment use and some of the land is unused or used for the storage of old motor vehicles. The landowner has submitted a further 1.16 hectares to the rear of existing allocation for consideration but it is currently outside the existing settlement boundary. As such both sites should be considered as an opportunity for a comprehensive development site adjacent to Harbour Village.

Appendix 3

Assessed Sites - Options

As both these sites lie within Flood Zone 3, the Environment Agency has advised this area is defended to the '200 year' standard by the Rother Tidal Walls West together with the Winchelsea Beach flood protection scheme, the area remains at risk and as such the exception test will need to be applied. There will be a requirement to undertake assessment of possible contamination resulting from employment use of the site and the appropriate measures are implemented. RH10 also borders the SSSI, SPA and Ramsar to the south, an EIA would be required to demonstrate that there would not be an adverse impact on the environmental designation resulting from the development of RH10.

Recommendations	Preferred site (residential).
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20.13. Villages - Westfield

Site ID	WF1
Site Name	Land at Cottage Lane
Site Assessment	
The site relates poorly to the existing village form and development boundary. As well as comprising a High Weald Area of Outstanding Natural Beauty (AONB) historic field boundary, it is in an exposed location within the AONB with far reaching views to the north. Adjacent roads are narrow country lanes. Development would be contrary to Core Strategy policies OSS3, RA1, TR1 and EN1.	
Recommendations	Not a preferred site.

Site ID	WF2
Site Name	Land at Barracks footpath, west of Cottage Lane
Site Assessment	
Although centrally located, the site is a pocket wooded greenspace and public amenity space that can be indirectly enjoyed by virtue of the adjacent public footpath. It includes oak trees covered by Tree Preservation Orders and is flanked by a stream. The loss of this site to development would be inappropriate based on ecological factors and public amenity value.	
Recommendations	Not a preferred site.

Site ID	WF3
Site Name	Land at Fishponds Farm and east of Workhouse Lane
Site Assessment	
Village fringe medieval Area of Outstanding Natural Beauty (AONB) landscape typified by enclosed pastures, possibly associated with historic farmstead off-site to east. The site is located within reasonable proximity to village services (although access would require significant works and upgrading). However, the site would represent a significant intrusion into High Weald AONB countryside, including the loss of hedgerows and negative impacts on protected species; as well as having adverse effects on neighbouring amenities. Development is neither appropriate nor necessary.	
Recommendations	Not a preferred site.

Site ID	WF6E
Site Name	Land off Moor Lane, north of Moor Farm
Site Assessment	<p>The last remaining unimplemented section from the 2006 Local Plan policy VL9. As such, it requires re-assessment as part of the current plan process. A greenfield site on the edge of the village that is well contained and screened from wider landscape and the original reasons for its allocation for development remain valid. Relative to the expectations of the previous Plan, adjacent development is of a relatively high density. Therefore, any development of this remaining section should reflect the now established character.</p> <p>The southern boundary appears to be an existing surface water flow-path, although the site appears to have a gentle slope to the east and north.</p>
Recommendations	Preferred site (residential).

Site ID	WF10
Site Name	Land at Ellenvale
Site Assessment	<p>Located on the elevated northern fringe of the village, the site is located outside the settlement boundary and poorly related to the main core of the village (contrary to Policies RA1, OSS3). Adjacent highways are narrow country lanes and of rural character. The area is within the Area of Outstanding Natural Beauty (Policy EN1 applicable) comprising formal enclosures currently in agricultural use (grade 3).</p>
Recommendations	Not a preferred site.

Site ID	WF13
Site Name	Land at Tanyard Farm House, Fishponds Lane
Site Assessment	<p>The site reads as part of the wider rural setting. The High Weald AONB information indicates the area of Tanyard Farmhouse is a historic farmstead, with an associated medieval field pattern. The traditional barn to the rear is also a non-designated heritage asset. A further historic farmstead is located off-site to the north.</p> <p>Preserved historic field boundaries mark eastern and south-eastern edges, with a further partially intact example sub-dividing the site. The northern field is separated by a hedge-line including semi-mature trees, protected by Tree Preservation Orders.</p> <p>Tertiary river streams mark southern and eastern boundaries as well as cutting across the eastern corner of the site, connecting two ponds (another High Weald Area of Outstanding Natural Beauty character feature, as well as a BAP priority habitat) one of which is on site in the NE corner. In addition to the areas alongside the streams, there is an additional surface water flow-paths sub-dividing the site on a north-south axis. It is notable that drainage restrictions were a reason for a 1974 refusal for 28 dwellings. Based on Highways Authority advice, highways works would be required at the junction with Moor Lane and South Terrace to ensure pedestrian safety. Overall, development is neither appropriate nor necessary.</p>
Recommendations	Not a preferred site.

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Assessed Sites - Options

Site ID	WF14
Site Name	Land west of Fishponds Farm, Fishponds Lane
Site Assessment	A medieval High Weald Area of Outstanding Natural Beauty (AONB) historic field boundary, likely associated with the historic farmstead off-site to the east. Along with WF13 and WF3, WF14 this area forms the area known as 'Fishponds' and is an important buffer between the village fringe and the wider AONB landscape and contributes to the setting of the village. When assessed in isolation, WF14 enclosed by hedgerows and tree belts. It is detached from the village fringe and would only come forward as part of comprehensive development alongside WF3 and WF13. However, such a scale of development would be a significant addition to the eastern flank of the village and would entail further erosion of this important buffer and should be resisted, raising issues with Core Strategy Policies OSS3, OSS4, OSS5, RA1, RA2, TR3, EN1.
Recommendations	Not a preferred site.

Site ID	WF15
Site Name	Land north of New Cut
Site Assessment	WF15 is a greenfield AONB site. Its development would represent a significant intrusion into an area of rural character. Access is down narrow country lanes lacking footways or scope to create them. Development would be contrary to several Core Strategy policies, including OSS3, OSS4, OSS5, RA1, RA2, TR3.
Recommendations	Not a preferred site.

Site ID	WF16
Site Name	Land east of New Moorside
Site Assessment	Large greenfield site comprising residential gardens and curtilage of Moorside, with a pond in north-east corner. Development would represent a further intrusion into an area of rural character that is comparatively further from the village core. Access is problematic and difficult to achieve, likely requiring highway re-assignment to achieve visibility; as well as replacing existing public footpath.
Recommendations	Not a preferred site.

Site ID	WF23
Site Name	Former Moorhurst Residential Care home
Site Assessment	<p>Now a brownfield site that is cleared of buildings, the site had a previous function (and established use) as a residential care home. In addition, it has had a more recent permission (2009) for a 48 bed residential care unit with day therapy suite, outreach and consulting rooms (RR/2552/CC). However, the latter was never implemented and has now expired. As a consequence, the site has remained vacant for many years.</p> <p>The site is reasonably well screened from the surrounding AONB countryside by virtue of both topography and mature boundary trees (which will be important to maintain as far as possible, subject to access requirements). It is also free of flood risk, environmental designations or notable High Weald Area of Outstanding Natural Beauty character features.</p> <p>Highways and sustainable access are the main constraining issues to intensive forms of development.</p>
Recommendations	Preferred site (retirement living/sheltered housing).

Site ID	WF24
Site Name	Land east of Moorfield House
Site Assessment	
<p>A High Weald Area of Outstanding Natural Beauty historic field that is comparatively further from village services and of wholly rural character.</p> <p>Access is also problematic - the site fronts onto the C22 which is essentially a winding country lane at this point. Sight lines would be extremely difficult to achieve. Mature trees are extensive at boundaries and fronting onto the highway. Pedestrian access would be further hampered by a lack of footways, or scope to create them.</p>	
Recommendations	Not a preferred site.

Site ID	WF25
Site Name	Land north-east of Moorfield House
Site Assessment	
<p>A partial High Weald Area of Outstanding Natural Beauty historic field that is of wholly rural character. The site abuts a public footpath and is exposed to view from the wider countryside to the east.</p> <p>Disconnected from village services and dependent on through access via other sites, which themselves have constrained access.</p>	
Recommendations	Not a preferred site.

Site ID	WF26
Site Name	Westfield Down
Site Assessment	
<p>An unimplemented allocation from the Local Plan 2006 (Policy VL11). The site comprises rising ground extending out of the village on the east side of the A28. The lower section of the site to the south-west is more visually contained in terms of wider landscape setting and is within reasonable walking distance of all key local services. It is therefore suited to housing development.</p> <p>Development on the higher ground to the north-east would be visible from the wider Area of Outstanding Natural Beauty countryside, but could satisfactorily accommodate sports and recreational uses, for which there is a recognised need within the village, particularly pitches.</p>	
Recommendations	Preferred site (residential - south side and recreation open space - north side).

Site ID	WF27
Site Name	Land connecting Moor Lane and the A28
Site Assessment	
<p>A narrow greenfield corridor that is partially an unimplemented element of Policy VL9 (for a footpath link) from the 2006 Local Plan. It is currently overgrown and inaccessible, but offers an opportunity to connect a notable gap in the footpath network, as well as being a local ecological opportunity.</p>	
Recommendations	Preferred site (pedestrian/cycle link and green corridor).

Appendix 3

Assessed Sites - Options

20.14. Gypsies and Travellers

Site ID	BA76
Site Name	Land north-west of Beeches Brook, Telham Lane, Battle
Site Assessment	
<p>The site is in the ownership of a Gypsy household who has three existing plots of land on the adjacent land. The site is located within the High Weald Area of Outstanding Natural Beauty (AONB). The majority of this site is located in Flood Zone 3. There is a strong presumption that highly vulnerable development (such as caravans) should not be located within Flood Zone 3.</p> <p>In terms of this site's prominence in the AONB, development of this part of the wider landholding would be highly visible in the landscape when approaching the site from Catsfield towards Battle (from the NW). This field is open in character with some development on the southern and eastern boundary (outwith the site) and development of this area would create an alien feature in the open landscape. Boundary planting would not be appropriate or effective to screen any development, partly because of the topography and as reduction of the open character of this paddock would appear alien. This site is not considered appropriate for development.</p>	
Recommendations	Not a preferred site.

Site ID	BA77
Site Name	Land adjacent to High Views, Loose Farm Lane, Battle
Site Assessment	
<p>The site is part of a smallholding located on the urban edge of Battle. It is an area of poor quality despoiled land which adjoins residential dwellings in ribbon development to the north and to the south it is rolling open countryside.</p> <p>The site is accessed via a single track off Loose Farm Lane – a narrow lane which connects the small complex of buildings at Loose Farm – served off the A2100 (Hastings Road).</p> <p>Immediately adjoining to the east are two existing pitches which a Planning Inspector accepted did not result in any material harm to the landscape character of this part of the Area of Outstanding Natural Beauty. The Inspector also concluded that the development only poses a limited risk to highway safety.</p> <p>The site is considered to be well located for access to services.</p> <p>This area is most acceptable in landscape terms compared to the rest of the wider small-holding (BA78). Care should be taken to respect the amenity of adjoining properties on the northern boundary. The site is relatively screened in the wider landscape, although the site would benefit from further native species screening on the southern and western boundaries.</p> <p>The section of the site closest to the existing Gypsy site is suitable for a small-scale expansion (1 pitch) of the adjacent use.</p> <p>The site is in the ownership of a Gypsy/Traveller household and has received planning permission for 1 pitch post the base date (1 April 2016) of the Development and Site Allocations Plan consultation.</p>	
Recommendations	Preferred site (gypsy and traveller site - 1 pitch).

Site ID	BA78
Site Name	Land off Loose Farm Lane, Battle
Site Assessment	
<p>The site is part of a smallholding located on the urban edge of Battle. It is an area of poor quality despoiled land which adjoins residential dwellings in ribbon development to the north and to the south it is rolling open countryside.</p> <p>The site is accessed via a single track off Loose Farm Lane – a narrow lane which connects the small complex of buildings at Loose Farm – served off the A2100 (Hastings Road).</p> <p>Immediately adjoining the site are two existing pitches which a Planning Inspector accepted did not result in any material harm to the landscape character of this part of the Area of Outstanding Natural Beauty (AONB). The Inspector also concluded that the development only poses a limited risk to highway safety.</p> <p>Whilst the adjacent site benefits from an extant planning permission, this wider site is not considered appropriate for further development for Gypsy and Traveller pitches. This is more visually exposed than the adjacent land (which is currently occupied by two gypsy households and BA77); screening would appear as an alien feature in the AONB landscape. Evidence from local Gypsy/Traveller households has indicated that small, family plots are generally preferred (around 3 plots). A larger development would be undesirable in landscape terms, impact on residential amenity of adjacent properties and attractiveness to Gypsy/Traveller households in the context of focusing provision on small sites.</p> <p>Also, the site is in multiple ownerships with no indication from the landowner/s that they wish to bring forward the site/parts of the site for this use.</p>	
Recommendations	Not a preferred site.

Site ID	BX88
Site Name	Actons Farm, Buckholt Lane
Site Assessment	
<p>This greenfield site is an existing farm with farm dwellings/farm buildings.</p> <p>The site is physically located very close to Combe Valley Way but there is no existing access point and it would not be appropriate to create a new access point onto Buckholt Lane. The existing access - Buckholt Lane is also unsuitable for access, it is a private, unmade road with narrow width and tortuous form.</p> <p>Parts of the site are at risk of flooding and therefore there is a presumption against residential development.</p> <p>The site is owned by East Sussex County Council but not identified on their asset disposal programme and therefore cannot be considered available.</p>	
Recommendations	Not a preferred site.

Site ID	BX108
Site Name	Land south east of Cooden Wood
Site Assessment	
<p>The south-western part of the site is located in Flood Zone 3 with the southern section of the site being located within Flood Zone 2. There is a public footpath which runs along the western boundary of the site. The site is visually exposed in longer views to the Pevensy Levels, particularly in the south west corner, and as such development of this field would be considered an unacceptable intrusion into the countryside, contrary to Policies OSS5 and EN1.</p>	
Recommendations	Not a preferred site.

Appendix 3

Assessed Sites - Options

Site ID	BX115
Site Name	Lower Barnhorn Farm and Caravan Park
Site Assessment	
<p>This site comprises of an existing farm building complex and existing caravan park with a temporary planning permission (expires in 2024). The loss of an existing tourism use would be contrary to Core Strategy Policy EC6.</p> <p>The site is relatively well located in terms of access to services in relation to Policies OSS3 and TR3.</p> <p>Given the presumption to retain tourism uses, this site is not considered suitable for development.</p>	
Recommendations	Not a preferred site.

Site ID	BX116
Site Name	Land off Spindlewood Drive
Site Assessment	
<p>This greenfield site is adjacent to the development boundary of Bexhill, just south of Barnhorn Road/ Spindlewood Drive, Little Common. The site is relatively well located in terms of access to services. The site is relatively close to bus services on Barnhorn Road, but there is no current pedestrian route to access Barnhorn Road directly from the site. Any development should provide for a pedestrian route to Barnhorn Road.</p> <p>It is relatively well contained from wider views by the adjacent wood (Cooden Wood), and this is important in containing any development at this location. The site levels are higher towards the existing residential development along Barnhorn Road, and any development will have to consider wider views.</p> <p>The Council's landscape assessment (2008) makes particular reference to the 'block of woodland and trees and hedges' to the west of this site that provide relative enclosure to this area and that this lends the area to some modest development. The adjacent Ancient Woodland to the west of the site is important in containing any potential development. There are two bands of trees that run through the site linking a wooded area to the north with Ancient Woodland to the south. This is an important feature and acts as a wildlife corridor between the two areas of woodland. The area bounded by these trees should remain open and undeveloped as a wildlife corridor/open space feature of the area.</p> <p>There is a viable access point from Spindlewood Drive through an existing field gate and a recent transport assessment relating to highway capacity of adjoining roads by the landowner is considered acceptable by the Highway Authority.</p> <p>The site is proposed to be allocated for residential dwellings (Policy BEX9) and does not contain a discrete area for the provision of a site for Gypsies and Travellers and therefore it is not considered suitable for the provision for Gypsy and Traveller pitches.</p>	
Recommendations	Not a preferred site.

Site ID	BX124
Site Name	North Bexhill
Site Assessment	
<p>This site was identified as part of a broad location in the 2013 SHLAA which was carried forward into the Key Diagram within the Core Strategy, while its Policy BX3 anticipates further development to the north of Bexhill, the scale, timing and locations to be determined.</p>	

It is likely that the Gypsy and Traveller site of five pitches at the eastern end of the development area east of Watermill Lane. This area is relatively contained in the landscape and would contribute to the outstanding district-wide need for such pitches. The site should be planned in a comprehensive way alongside the other development provisions made within Policy BEX3, to ensure integration with the surrounding development. As well integrated provision of housing and infrastructure, the green infrastructure and mitigation and/or compensation for any biodiversity losses.

Recommendations	Preferred site (gypsy and traveller site - 5 pitches).
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Site ID	BL4
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Site Name	Coldharbour Farm estate, Battle Road, Dallington
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Site Assessment

The site has been granted temporary planning permission by a Planning Inspector on appeal and it is due to expire 17 July 2018. The siting of the mobile home has been considered by a number of Planning Inspectors who have concluded that this site causes considerable harm of the character and appearance of the landscape and an unacceptable impact on the Area of Outstanding Natural Beauty (AONB). The site is located in an elevated position in the landscape and introduces of a domestic element to this part of the AONB.

The site does have good access to the road network but is poorly located in respect of all other services (some 8km). Therefore, it is considered that this site is not a suitable option as a Gypsy/Traveller site.

Recommendations	Not a preferred site.
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Site ID	CC1
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Site Name	Cripps Corner highway depot, Cripps Corner
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Site Assessment

This East Sussex County Council (ESCC) owned highway depot is still currently in use and this is likely to continue in the short-term. Therefore, the site is not immediately available for use, but it may be reconsidered in the longer-term following a future review of ESCC highway depots.

The site has a dense tree belt on the east/north/west boundaries which restricts the size of the site. The site is level and relatively exposed on the roadside frontage, but there is potential to improve the screening on the roadside boundary. There is a good existing access to a "B" road but the site is considered to be poorly located for access to services and there are no footpaths in the vicinity.

Recommendations	Not a preferred site.
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Site ID	CR8
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Site Name	Land south of Catsfield Road, Crowhurst
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Site Assessment

This is a large area of land north east of Crowhurst village. The areas that have direct road access to Catsfield Road (northern part of the site) could only be considered to have some potential. However, the land is visually prominent in the wider landscape and would be difficult to screen without looking alien in the landscape. It is likely that there will be issues with the suitability of the capacity of the road network to accommodate caravans. The site is poorly located for access to most services. Therefore, it is considered that this site not suitable for development.

Recommendations	Not a preferred site.
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Appendix 3

Assessed Sites - Options

Site ID	FL17
Site Name	Land at Cherry Tree Nursery, The Mount, Flimwell
Site Assessment	
<p>The site has previously benefitted from temporary planning permissions for Gypsy/Traveller use on part of the site. However, the latest planning appeal decision indicated that the household which owns the site did not meet the national planning definition for Gypsy/Traveller households. It is likely that the owner is unlikely to bring forward the site for other Gypsy/Traveller households.</p> <p>The site is located within the High Weald Area of Outstanding Natural Beauty (AONB) and located well outside any development boundary. The site is level and the previous siting of the caravan (north-west corner of the site) is largely screened from the road by existing hedges and agricultural buildings on the site. However, there is current enforcement action on the site seeking to remove these agricultural buildings. Previous appeal Inspectors have indicated that a mobile home on this site (in the absence of the agricultural buildings) would thus fail to conserve and enhance the natural beauty of the AONB.</p> <p>The site lies on the ridgeline which is prominent in the wider landscape. The wider site forms an important gap in the existing ribbon development along Hawkhurst Road. There are good road links, but the site is not considered to be particularly well located in terms of access to services. It is therefore considered that the site is not available or suitable for development.</p>	
Recommendations	Not a preferred site.

Site ID	GU4
Site Name	Guestling Green highway depot, Chapel Lane, Guestling Green
Site Assessment	
<p>The site is an existing highways depot owned by East Sussex County Council, but identified as surplus to requirements.</p> <p>This brownfield site is level and well screened from public view by the existing hedging. Although the site is physically separate from the built-up area boundary of the village, it is visually well contained within the ribbon development along Chapel Lane. However, the site would benefit from some additional screening to its eastern boundary (there are some views to the north and east). The site is located within the High Weald Area of Outstanding Natural Beauty.</p> <p>There would be limited impact on neighbouring amenities and the site is located relatively close to an existing bus route on the A259 (although there is no footway along Chapel Lane to the site). Whilst Guestling Green is not identified as a particularly sustainable location for development (the site is not particularly well located for access to many key services) Government policy focuses on the re-use of brownfield sites for alternative uses.</p> <p>There is an existing suitable access point off Chapel Lane. However, the lane is narrow, while on-street parking, especially at school drop-off and pick-up times, makes it difficult for vehicles to manoeuvre along the road, particularly for larger vehicles. Given the narrow highway access on Chapel Lane, it is not considered a suitable site for Gypsies and Travellers.</p> <p>Cross reference is made to Policy GUE1 where the site is considered most suitable for a relocated and expanded doctor's surgery and 'intermediate care facility.</p>	
Recommendations	Not a preferred site.

Site ID	RB19
Site Name	Land adjacent to Robertsbridge Traveller Site, Redlands Lane, Robertsbridge
Site Assessment	
<p>The site adjoins an existing permanent East Sussex County Council owned Gypsy site, which is segregated from the rest of Robertsbridge by the A21. The site is fairly well located in terms of access to services.</p> <p>The site is visually well screened from public viewpoints. The site would need to be cleared and levelled and a suitable access achieved. Historically, the site was used as a landfill and further investigation would be needed to ascertain the extent of the contamination. Any associated mitigation would need to be incorporated into any development.</p> <p>The site is in private ownership.</p> <p>The adjacent existing site is relatively large and already comprises of 9 pitches. There is some concern that additional pitches in this location may be considered disproportionate in scale to surrounding development.</p>	
Recommendations	Not a preferred site.

Site ID	RY45
Site Name	Chippings Depot, Rye
Site Assessment	
<p>The site is in multiple public ownerships and is currently occupied. The site has not been identified as surplus to requirements at this present time. A large proportion of the site is located within Flood Zone 3. The site is well located in terms of access to services and has direct access to the A259, but is close to the junction with Harbour Road. The western part of the site is safeguarded for a potential future footpath/cycleway widening scheme. The site is visually prominent from all sides and would be difficult to adequately screen. This site is not considered available for use or suitable for use as a traveller site at this present time.</p>	
Recommendations	Not a preferred site.

Site ID	SP6
Site Name	Land north of Bramble Farm, Ewhurst
Site Assessment	
<p>The site is in the ownership of a Gypsy household. This site is part of a larger area of land which is adjacent to an existing site which has a temporary planning permission (due to expire 4 July 2019). The site is located within the High Weald Area of Outstanding Natural Beauty (AONB). The site is part of a small-holding. Some areas of flood risk along the access track to the site (outwith the site). The site is not particularly well located in terms of access to services. The site is an area of open countryside which is visually prominent from the road. This wider site forms part of the wider rolling countryside and would be difficult to screen without becoming an alien feature in the wider landscape. Any expansion into this wider area would create an unacceptable erosion of the character and appearance of the AONB.</p>	
Recommendations	Not a preferred site.

Appendix 3

Assessed Sites - Options

Site ID	SP7
Site Name	Land to the rear of Bramble Farm, Ewhurst
Site Assessment	
<p>The site is located to rear of an existing barn, against a backcloth of established, native trees. The site forms part of a larger area of land being used as a smallholding. The surrounding area is rolling open countryside and is located within the High Weald Area of Outstanding Natural Beauty (AONB). There are a small number of residential properties to the east and south of the site. The site is accessed via a single track off Staplecross Road which is also used to access the wider smallholding. This area is relatively well contained at present and not visually prominent from the main road. Some areas of flood risk along the access track to the site (outwith the site). The site is not particularly well located in terms of access to services, but a small scale site in this location would not place undue pressure on local infrastructure and services. However the predominant means of transport would be by car.</p> <p>Previous appeal Inspectors have indicated that they are satisfied that taking into account the nature of the vehicular movements associated with the residential use; the separation distances between properties; the nature of the intervening planting; the remote location of the access point; and the small scale nature of the caravan site accommodating a single family group, the residential use does not unacceptably harm the living conditions of the neighbouring residents in respect of noise and disturbance.</p> <p>The site is in the ownership of a Gypsy household which has a temporary planning permission for 1 pitch (due to expire 4 July 2019).</p> <p>Some planting (conifers and laurels) has been carried out in front of (west) and beyond (going north) the area where the mobile home/s are currently located. This planting does help to screen the residential element of the site, although it would benefit from a native mix of tree planting to sit more comfortably within the wider landscape. Additional native screening would better reflect the character and appearance of the surrounding AONB countryside.</p> <p>Notwithstanding the additional screening effects, having regard to previous planning appeal Inspectors' consideration, it is still regarded as an inappropriate site for permanent Gypsy pitches within the High Weald AONB and is in an unsustainable rural location which is not well related to services.</p>	
Recommendations	Not a preferred site.

Site ID	WF18
Site Name	Land to east of Down Edge, Main Road, Westfield
Site Assessment	
<p>This greenfield site is restricted in size and there is no current access to the land at present. The creation of an access would result in the removal of at least one tree. Any access would need to be via the existing track which is narrow, particularly during the day when it is used as overflow parking for the adjacent doctor's surgery. East Sussex County Council Highways consider that the access with the A28 is considered suitable to serve the site. The landowner has not indicated that the site is surplus to requirements. The site is visually well contained from wider views but would benefit from additional screening along site boundaries, particularly on the southern boundary. The site is adjacent to the development boundary and is well located for access to services. Given the landowner has not indicated that the site is surplus to requirements, this site is not considered available for development at this time.</p>	
Recommendations	Not a preferred site.

Site ID	WF19
Site Name	Land south west of Moor Lane, Westfield
Site Assessment	
The site is part of an unimplemented element of Policy VL9 from the 2006 Local Plan.	

It offers a sustainable alternative link for pedestrians and cyclists by connecting a notable gap in the footpath network and providing a green transport corridor that extends almost the length of the village, connecting to the GP surgery and Westfield Down recreation development.

This greenfield site is level and well contained by existing hedging. The proximity of adjacent residential properties does result in a degree of overlooking.

The site is well located for access to services within Westfield village. The southern part of the site is affected by surface water flooding as identified on the Council's Strategic Flood Risk Assessment (SFRA). This site would be better suited as part of a footpath/cycleway. Cross reference is made to Policy WES4 where the site is considered most suitable for as part of a green corridor and public footpath/cycle-route.

Recommendations	Not a preferred site.
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Site ID	MO7
Site Name	Land adjacent to Mountfield household waste site, Mountfield
Site Assessment	
<p>The greenfield site is in private ownership, but the owner has indicated that they are willing to put this site forward as a Gypsy and Traveller site. The site is within close proximity to an existing household waste site which is currently in use, as such there are strong concerns regarding contamination on the site. There is also historical use on this site for refuse disposal. There is good access to the road network although improvements would be needed to allow for turning of vehicles into the site.</p> <p>The site is visually well contained from the main road and not near residential dwellings. Although majority of services would need to be accessed via vehicular transport, there is direct access to an A road/bus route.</p> <p>The area suffers from surface water flooding. The site is located within the High Weald Area of Outstanding Natural Beauty. Given the serious concerns with potential contamination, an adjacent unneighbourly use which would have a negative impact on residential amenity and distance from services, this site is not considered suitable for development.</p>	
Recommendations	Not a preferred site.

20.15. Marley Lane

Site ID	ML1
Site Name	Land at Felon's Field, Marley Lane
Site Assessment	
<p>The site lies on the south side of Marley Lane close to its junction with the A21. It is generally open with a large area of hardstanding, but well-wooded along its edges (all trees protected by a TPO) and a regenerated clump of trees around a protected oak within the site. An industrial site, primarily in use as a highway depot, adjoins the site to the north-east. There is Ancient Woodland to the south-west. The site falls away to a stream to the south. The north-eastern part of the site lies within a groundwater source protection zone. The site was allocated for industrial/storage purposes in the 2006 Local Plan.</p> <p>While the site is clearly distant from any settlement, it still offers a very rare opportunity for businesses that would benefit from good access to the strategic road network. A recent planning permission for a highways depot has confirmed the potential for development without undue impact on environmental considerations.</p> <p>Any development would need to retain protected trees that contain the site and support biodiversity, as well as safeguard against water pollution and high run-off. The developable area should be reduced accordingly.</p>	
Recommendations	Preferred site (employment).

21. Appendix 4

Glossary of Terms

1. **1066 Country Walk** – the route commemorates 1066, the year of the Battle of Hastings, and seeks to link the places and the people of that important year. It runs through East Sussex from Pevensey to Rye, passing through Battle.
2. **Accessibility** – the ability of people to move around an area and reach places and facilities, including elderly and disabled people, those with young children and those encumbered with luggage or shopping.
3. **Affordable housing** – affordable housing includes social rented, affordable rented and intermediate housing, provided to specified eligible households whose needs are not met by the market. Affordable housing should:
 - a. Meet the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and local house prices.
 - b. Include provision for the home to remain at an affordable price for future eligible households or, if these restrictions are lifted, for the subsidy to be recycled for alternative affordable housing provision.

Rother District Council housing service requires affordable housing to be provided through a “registered provider”.
4. **Ancient Woodland** – woodland that is likely to have existed before 1600AD and contains trees and shrubs that are predominately native not obviously planted but have arisen through natural regeneration or coppice re-growth.
5. **Appropriate Assessment** – Appropriate Assessment (AA) refers to stage 2 of the Habitat Regulations Assessment (HRA) process. It considers the impacts of a plan or project assessed against the conservation objectives of a European Site, in order to identify whether there are likely to be any adverse effects on site integrity and site features. The purpose of appropriate assessment of local plans is to ensure that protection of the integrity of European sites is a part of the planning process at a regional and local level. The European sites concerned are known as Natura 2000 sites.
6. **Area of Outstanding Natural Beauty (AONB)** – areas of national importance for their landscape character and appearance, within which the conservation and enhancement of their natural beauty is a priority. These are designated under the National Parks and Access to the Countryside Act 1949 by the Secretary of State for the Environment.
7. **Biodiversity** – the whole variety of life encompassing all genetic, species and ecosystem variations, including plants and animals.

8. **Biodiversity Action Plan (BAP)** – a strategy aimed at conserving and enhancing biological diversity. The Sussex BAP is prepared by the Sussex Biodiversity Partnership. It applies the national targets and actions for each of our important habitats and species identified in the UK Biodiversity Action Plan (UKBAP) and applies it to a local level.
9. **Biodiversity Opportunity Area (BOA)** – Biodiversity Opportunity Areas (BOAs) represent the targeted landscape-scale approach to conserving biodiversity in Sussex. Biodiversity Action Plan (BAP) targets are often linked to BOAs. BOAs were identified through mapping work carried out by the Sussex Biodiversity Record Centre to assess the existing biodiversity resource and the potential for restoration and creation.
10. **Brownfield Land/Site** – land which has previously been developed (see Previously Developed Land).
11. **Building Regulations** – regulations which are separate from planning but which have to be adhered to in the construction of development.
12. **Campaign for Real Ale (CAMRA)** – an independent voluntary consumer organisation which promotes real ale, real cider and the traditional British pub.
13. **Campaign to Protect Rural England (CPRE)** – a registered charity with over 60,000 members and supporters, formed in 1926 to limit urban sprawl and ribbon development.
14. **Catchment Flood Management Plan (CFMP)** – a Catchment Flood Management Plan is a strategic planning tool through which the Environment Agency will seek to work with other key decision-makers within a river catchment to identify and agree policies for sustainable flood risk management.
15. **Combined Heat and Power** – CHP plants incorporate both power and heat from a single heat source.
16. **Commitments** – the use of the term in this plan relates to all proposals for development which are the subject of a current full or outline planning permission.
17. **Community Infrastructure Levy (CIL)** – a levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area, as set out in regulations.
18. **Comparisson Goods/Floorspace** – comparisson goods are items not obtained on a frequent basis. These include clothing, footwear, household and recreational goods.
19. **Conservation Area** – an area designated under the Town and Country Planning (Listed Building and Conservation Areas) Act 1990 on account of its special architectural or historic interest, the character and appearance of which it is intended to preserve and enhance.
20. **Contaminated Land** – land that has been polluted or harmed in some way making it unfit for safe development and usage unless cleaned.
21. **Convenience Goods/Floorspace** – convenience goods are everyday essential items, including food, drinks, newspapers/magazines and confectionery.

22. **Core Strategy** – sets out the long-term vision for the future of the area, the spatial objectives and strategic policies to deliver that vision. It forms Part 1 of the Council's Local Plan for the District. It was adopted (approved) in September 2014.
23. **Cumulative Impact** – where there are a number of developments in a locality or a continuous activity over time that together may have an increased impact on the environment, local community or the local economy.
24. **Department for the Environment Food and Rural Affairs (DEFRA)** – the UK Government department tasked with issues such as the environment, rural development, the countryside, wildlife, animal welfare and sustainable development.
25. **Development Plan** – the statutory development plan is the starting point in the consideration of planning applications for the development or use of land. The development plan consists of local plans prepared by the District Council, with Minerals and Waste Local Plans prepared by the County Council, and Neighbourhood Plans prepared locally by Town or Parish Councils.
26. **Employment Land** – that which is in use for the following purposes – office, industrial and warehousing - falling within Use Class B of the Use Classes Order or similar uses.
27. **Environment Agency (EA)** – an Executive Agency of DEFRA, this body is responsible for wide-ranging matters, including the management of water resources, surface water drainage, flooding and water quality.
28. **Evidence Base** – the information and data gathered by local authorities to justify the “soundness” of the policy approach set out in local planning documents, including physical, economic, and social characteristics of an area.
29. **Exception Site** – a site located outside a development boundary that should only be used for affordable housing to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection.
30. **Farm Diversification** – the development of farm-based, non-agricultural activities to help sustain the farm holding.
31. **Floodplain** – an area of land over which water flows in time of flood or would flow but for the presence of flood defences where they exist.
32. **Flood Zone 1 (Low Probability)** – this zone comprises land assessed as having a less than 1 in 1000 annual probability of river or sea flooding in any year (<0.1%).
33. **Flood Zone 2 (Medium Probability)** – this zone comprises land assessed as having between a 1 in 100 and 1 in 1000 annual probability of river flooding (1% – 0.1%) or between a 1 in 200 and 1 in 1000 annual probability of sea flooding (0.5% – 0.1%) in any year.
34. **Flood Zone 3a (High Probability)** – this zone comprises land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%) or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year.

35. **Flood Zone 3b (Functional Floodplain)** – this zone comprises land where water has to flow or be stored in times of flood (land which would flood with an annual probability of 1 in 20 (5%) or greater in any year or is designed to flood in an extreme (0.1%) flood).
36. **Greenfield Land or Site** – land (or a defined site) usually farmland, that has not previously been developed, also including allotments and residential gardens.
37. **Gypsies and Travellers** – persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling show people or circus people travelling together as such. (Planning policy for traveller sites, 2015).
38. **Habitat** – the natural living space of a plant or animal.
39. **Habitat Regulations Assessment (HRA)** – this describes the entire assessment process set out in the Habitats Directive and associated regulations. It includes an 'appropriate assessment'. The Habitats Directive protects habitats and non-avian species of European importance and applies to Special Areas of Conservation (SACs) while the European Directive (79/409/EEC) on the Conservation of Wild Birds (Birds Directive), protects bird species of European importance and applies to Special Protection Areas (SPAs). These are known as the network of Natura 2000 Sites or "European Sites".
40. **Highways England** – an executive agency of the Department of Transport responsible for operating, maintaining and improving the strategic road network of England.
41. **Housing Association** – a non-profit making, independent organisation that provides housing; generally they provide accommodation for people in housing need who are unable to afford to buy or rent housing on the open market.
42. **Infill Development** – development of a vacant site in a substantially developed frontage or area.
43. **Infrastructure** – the basic requirements for the satisfactory development of an area and include such things as roads, footpaths, sewers, schools, open space and other community facilities.
44. **Intermediate Housing** – housing at prices and rents above those of social rent, but below market price or rents. This can include shared equity schemes, such as HomeBuy, other low cost homes for sale and intermediate rent.
45. **Landscape Character Assessment** – an assessment to identify different landscape areas which have a distinct character based on a recognisable pattern of elements, including combinations of geology, landform, soils, vegetation, land use and human settlement.
46. **Listed Building** – a building of special architectural or historic interest as designated by English Heritage on behalf of the Department for Culture, Media and Sport, this is a statutory listing.
47. **Local Area for Play (LAP)** – a small area of open space for young children (mainly

4-6 year olds) to play games such as tag, hopscotch, French cricket or play with outdoor toys. The activity zone should be reasonably flat, have a grass surface, and minimum area of 100sqm. There should be seating for carers and appropriate landscaping/buffer zones.

- 48. **Local Equipped Area for Play (LEAP)** – a play area equipped for children of early school age (mainly 4-8 year olds). The activity zone should have a minimum area of 400m², with grass playing space and at least five types of play equipment with appropriate safety surfacing. There should also be seating for accompanying adults.
- 49. **Local Development Scheme (LDS)** – a document setting out the programme for the preparation of the local planning policy documents. It sets out a 3-year programme and includes information on consultation dates.
- 50. **Local Distinctiveness** – the particular positive features of a locality that contributes to its special character and sense of place, distinguishes one local area from another.
- 51. **Local Plan 2006** – old-style Local Plan adopted in 2006, some saved policies of which still form part of the development plan for the district.
- 52. **Local Plan** – the collective terms for documents prepared by each Local Planning Authority to provide the policy framework for delivering the spatial planning strategy for the Local Planning Authority area.
- 53. **Local Plan Monitoring Report (LPMR)** – produced by the local authority this will assess the impact of policies and whether targets are being met, and where necessary identify adjustments or revision to policies/proposals. (Previously known as the Annual Monitoring Report.)
- 54. **Local Planning Authority** – the local government body responsible for formulating planning policies (in a local development framework), controlling development through determining planning applications and taking enforcement action when necessary. This is a district council, unitary authority, metropolitan council or national park authority.
- 55. **Market Housing** – private housing for rent or for sale, where the price is set in the open market.
- 56. **Material Consideration** – a matter that should be taken into account in deciding a planning application or on an appeal against a planning decision.
- 57. **Mitigation Measures** – those which are put in place to reduce or eliminate any harm caused e.g. building a house in an area of flood risk, the developer could build the house on stilted foundations to minimise the risk as a mitigation measure.
- 58. **Mixed Use** – development containing some mixture of commercial, retail and/or residential uses.
- 59. **Multi-Use Games Area (MUGA)** – an outdoor fenced area for various types of games, such as football, basketball or tennis.

60. **National Nature Reserve (NNR)** – NNRs contain examples of some of the most important natural and semi-natural terrestrial and coastal ecosystems in Great Britain. They are managed to conserve their habitats or to provide special opportunities for scientific study of the habitats, communities and species represented within them. NNRs are declared by the statutory country conservation agencies under the National Parks and Access to the Countryside Act 1949 and the Wildlife and Countryside Act 1981.
61. **National Planning Policy Framework (NPPF)** – the National Planning Policy Framework sets out the Government’s planning policies for England and how these are expected to be applied. It sets out the Government’s requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.
62. **Natural England** – is a Non-Departmental Public Body of the UK Government. It was formed (vested) on 1 October 2006. It is responsible for ensuring that England’s natural environment, including its land, flora and fauna, freshwater and marine environments, geology and soils are protected and improved. It also has a responsibility to help people enjoy, understand and access the natural environment.
63. **Natura 2000** – European Union network of sites designated by Member States under the Birds Directive and under the Habitats Directive.
64. **Open Space, Sport and Recreation Study** – the Study undertook an audit and assessment of open space across the Rother district in accordance national guidelines. The Study assessed open space, sport and recreational needs of people living, working and visiting Rother, produced local provision standards and identified areas of surplus and deficiency based on quantity quality and accessibility across the district.
65. **Parish Council** – a type of local authority found in England which is the lowest, or first, tier of local government. They are elected bodies and are responsible for areas known as civil parishes. They cover only part of England; corresponding to 35% of the population, but cover all of Rural Rother excluding Battle and Rye (which are covered by Town Councils) and Bexhill. Parish Councils can prepare Neighbourhood Plans.
66. **Previously Developed Land** – land which is or was occupied by a permanent (non-agricultural) structure and associated fixed surface infrastructure, including the curtilage of the development, in urban and rural areas, but excluding garden land. It excludes land and buildings that have been used for agricultural purposes, forest and woodland, and land in built-up areas, which has not been developed previously.
67. **Radii** – plural of ‘radius’.
68. **Ramsar Site** – a wetland site of international importance (especially as a waterfowl habitat) designated by the Secretary of State for the Environment, Food and Rural Affairs.
69. **Renewable Energy** – is energy flows that occur naturally and repeatedly in the environment, for example from the wind, water flow, tides or the sun.

- 70. **Run-off** – that part of precipitation, snow melt, or irrigation water that runs off the land into streams or other surface water. It can carry pollutants from the air and land into the receiving waters.
- 71. **S106 Agreement** – a legal agreement under section 106 of the 1990 Town & Country Planning Act. Section 106 agreements are legal agreements between a planning authority and a developer, or undertakings offered unilaterally by a developer, that ensure that certain extra works related to a development are undertaken.
- 72. **SA/SEA** – see Sustainability Appraisal/Strategic Environmental Assessment.
- 73. **Sequential Approach/Test** – a planning principle that seeks to identify, allocate or develop certain types or locations of land before others. For example, brownfield sites before greenfield sites or town centre retail sites before out-of-centre sites, or areas at low risk of flooding before areas of medium and high risk of flooding.
- 74. **Shoreline Management Plan (SMP)** – a Shoreline Management Plan (SMP) provides a large-scale assessment of the risks associated with coastal evolution and presents a policy framework to address these risks to people and the developed, historic and natural environment in a sustainable manner. In doing so, an SMP is a high-level document that forms an important part of the Department for Environment, Food and Rural Affairs (Defra) strategy for flood and coastal defence (Defra, 2001).
- 75. **SHLAA** – see Strategic Housing Land Availability Assessment.
- 76. **Site of Special Scientific Interest (SSSI)** – an area of special interest by reason of its flora, fauna, geological or physiographical features as identified by Natural England and designated under the Wildlife and Countryside Act 1981.
- 77. **Site of Nature Conservation Importance (SNCI)** – an area (non-statutory) designated by Rother District Council as being of county wildlife value.
- 78. **Soundness** – a test of a Local Plan which may be considered sound if it is based upon good evidence and has been prepared in accordance with all the necessary procedures including the measures set out in the authority's Statement of Community Involvement.
- 79. **Special Area of Conservation (SAC)** – designated natural habitat areas to comply with the EEC Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora Directive (92/43/EEC). Member States are required to identify sites for designation and establish measures necessary for conservation. (Together with SPAs, SACs form a network of European sites known as Natura 2000.)
- 80. **Special Protection Area (SPA)** – designated wild bird areas to comply with the EC Directive on the Conservation of Wild Birds - (79/409/EEC); (Together with SACs, SPAs form a network of European Sites known as Natura 2000.)
- 81. **SSSI** – see Site of Special Scientific Interest.
- 82. **Strategic Housing Land Availability Assessment (SHLAA)** – a background evidence study that examines the suitability of potential new sites for housing.

83. **Supplementary Planning Documents (SPDs)** – these can be produced to provide policy guidance to supplement the policies and proposals in Local Plans. However they do not form part of the Development Plan although they must undergo a formal process of consultation.
84. **Strategic Flood Risk Assessment (SFRA)** – an assessment of the likelihood of flooding in a particular area so that development needs and mitigation measures can be carefully considered.
85. **Strategic Gap** – area of largely open land between settlements, which helps to maintain the separate identity and amenity of settlements and prevent them merging together. The boundaries are defined in the Local Plan.
86. **Submission** – the final stage in preparation of Plans, whereby they are submitted to the Secretary of State for an Independent Examination.
87. **SuDS** – see Sustainable Urban Drainage Systems.
88. **Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA)** – local Planning Authorities are required to assess the environmental and sustainability impact of policies and proposals in Local Plans and Supplementary Planning Documents. This is a tool for appraising policies to ensure that they reflect sustainable development objectives, i.e. social environmental and economic factors.
89. **Sustainable Communities** – places where people want to live and work, now and in the future. They meet the diverse needs of existing and future residents, are sensitive to their environment, and contribute to a high quality of life. They are safe and inclusive, well planned, built and run, and offer equality of opportunity and good services for all.
90. **Sustainable Development** – development that meets the needs of the present without compromising the ability of future generations to meet their own needs; ensures a better quality of life for everyone now and for generations to come.
91. **Sustainable Transport** – often meaning walking, cycling and public use of transport, which is considered to be less damaging to the environment and that contributes less to traffic congestion than one-person car journeys.
92. **Sustainable Urban Drainage Systems (SuDS)** – they include a range of different drainage systems that are designed to promote the filtration and evaporation of water as close to the source as possible and to break down pollutants. SUDS are an alternative to drainage through pipes directly to a watercourse and will help enhance water quality and biodiversity, maintain groundwater levels and reduce the risk of flooding.
93. **Town Council** – in England, town councils are civil parish councils, where the civil parish has declared itself to be a town. Civil parishes are the most local level of elected governance, under the district, unitary or county level. There are two in Rother district covering Rye and Battle. Town Councils can prepare Neighbourhood Plans.

94. **Travel Plan** – a document most commonly produced by/for a large employer which tends to generate a large number of journeys by car. The plans include measures to reduce car dependency and facilitate transport choice, by encouraging more sustainable alternatives to car use.
95. **Travelling Showpeople** – members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined in Planning policy for traveller sites, 2012.
96. **Tree Preservation Order (TPO)** – an Order made by a planning authority specifying trees which may not be lopped, topped or felled without consent, except where they become dead, dying or dangerous, when replacements may be required.
97. **Vitality and Viability** – in terms of retailing, vitality is the capacity of a centre to grow or to develop its level of commercial activity. Viability is the capacity of a centre to achieve the commercial success necessary to sustain the existence of the centre.

