

**APPENDIX 1 to Rother District Council Local Plan Core Strategy Inspector's Report
July 2014**

Rother District Council Local Plan Core Strategy

Single Set of Main Modifications

June 2014

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Rother District Council Local Plan – Single Set of Main Modifications to the Core Strategy

This table shows the complete set of ‘Main Modifications’ to the Proposed Submission Core Strategy.

For the first time It combines within a single table and document the two previously published sets of Main Modifications, namely:

- June 2012 Focused Amendments to the Proposed Submission Core Strategy
- August 2013 Schedule of Main Modifications

The combined mods have been given a new unique reference number in the first column, whilst their previous reference number from one of the above two documents has also been published in the 2nd and 3rd columns for purposes of cross-referencing.


This complete set of combined mods is presented in chapter order.

The formatting of the August 2013 Schedule of Main Modifications has been copied over into this document to a large extent. For example, for modifications that originate from the August 2013 mods text that is proposed to be deleted is preceded by **[Delete]** and shown in struck-through ~~red text~~. whilst new text is preceded by **[Insert]** and shown in **green text**.

For modifications that originate purely from the June 2012 Focused Amendments, this colour formatting was not utilised and therefore does not apply. However in some instances where amendments were made to the same policy in both the 2012 Focused Amendments and the 2013 Main Mods (eg. Policy RY1) the 2012 amendments have been presented using the 2013 Mods colour formatting for ease of understanding.

‘Minor’ modifications are presented in a separate document.

June 2014 Combined Modification s and Amendment s Number	June 2012 Focused Amendment No	August 2013 Main Modification ID	Document (Page No.)	Proposed modification
Chapter 2 – Policy Context				
1		MOD 2.1	p6	<p>Proposed additional policy – Presumption in favour of sustainable development.</p> <p>Add the following policy and text after paragraph 2.4 in the Proposed Submission Core Strategy (incorporating the focused amendments):</p> <p>[Insert] When considering development proposals, a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework will be taken.</p> <p>Planning applications that accord with the policies in the Local Plan (and, where relevant, with policies in a Neighbourhood Plan) will be dealt with promptly and approved unless material considerations indicate otherwise. Account will be taken of whether policies are up-to-date, having regard to most recent monitoring information, as well as policies of the NPPF.</p> <p>The Council will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.</p>
2		MOD 2.2	p6-8	<p>Delete paragraphs 2.6 – 2.14 and replace with new text:</p> <p>[Delete]</p> <p>The South East Plan</p>

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				<p data-bbox="982 338 2783 436">2.6 The South East Plan covers the period to 2026 and was approved by the Government in May 2009. For the region as a whole, it aims to deliver a healthier region, a more sustainable pattern of development, a dynamic and robust economy, reduced levels of social exclusion, and a more bio-diverse environment with a reduced level of natural resource consumption.</p> <p data-bbox="982 506 2783 569">2.7 The Plan also includes a sub-regional strategy for the 'Sussex Coast' area from Chichester to Rye. Its extent in Rother district is shown on Figure 1.</p> <p data-bbox="982 604 1970 636">Figure 1: South East Plan 'Sussex Coast' Sub-Region within Rother District</p>  <p data-bbox="982 1451 2742 1514">2.8 As can be seen, this sub-region embraces Bexhill and Rye and the adjacent coastal areas (as well as neighbouring Hastings). Generic South East Plan policies apply to the remaining inland parts of the district, including Battle.</p> <p data-bbox="982 1549 2783 1648">2.9 Policy SP4 identifies the Sussex Coast as an area in need of regeneration. This is carried forward into the specific Sussex Coast Strategy, which prioritises the social and economic regeneration of the towns in the sub-region. Policy SCT2 specifically highlights Hastings/Bexhill as warranting continuing priority in investment decisions of the public and private sectors.</p> <p data-bbox="982 1684 2783 1782">2.10 The South East Plan states that Bexhill is one of only a couple of areas of strategic scope for additional greenfield development in the Sussex Coast sub-region. This is reflected in the housing provision for the Rother part of the Sussex Coast sub-region, being 4,000 dwellings over the period 2006-2026, equivalent to an annual average of 200 dwellings.</p> <p data-bbox="982 1818 2792 1917">2.11 The remaining, inland parts of Rother are identified as needing to accommodate 1,600 dwellings (80 dwellings per annum) over the same period. Hence, for Rother as a whole, the Plan requires 5,600 dwellings (280 dwellings per annum) between 2006 and 2026. It adds, at Policy SCT5, that there may be some flexibility in the precise split between the two sub-areas of the district.</p> <p data-bbox="982 1948 2353 1980">Government's proposed changes to the planning system, and the South East Plan</p>

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				<p>2.12 Draft legislation in the Localism Bill proposes to abolish regional spatial strategies, including the South East Plan. Removing this regional tier of planning, and its associated “top-down” housing targets, is a strong commitment of Coalition Government.</p> <p>2.13 However, at this time, the South East Plan remains effective, and a statutory part of the ‘development plan’, with which the Core Strategy should generally conform.</p> <p>2.14 Even so, it is clear that there is increasing discretion for local planning authorities to re-consider their existing housing targets and to establish the right level of development for their area. Therefore, while evidence underpinning the preparation of the South East Plan is relevant background material, the Council has supplemented this through further examination of more recent information in order to determine the most appropriate future levels of development. Further details of this evidence can be found in the relevant background papers, with details on policies in the appropriate chapters of the Core Strategy.</p> <p>[Insert] While this Strategy was prepared in the context of the <u>South East Plan (2009)</u>, that Plan was formally revoked in March 2013. Its broad strategy to focus development in the coastal part of the District (and East Sussex generally) in order to support its regeneration is followed through in this Strategy. The South East Plan also has a bearing on this strategy insofar as development and infrastructure provisions in existing plans in the region have been prepared in general conformity with it.</p>
3	FA1		Chapter 2, pg. 9 New paragraph	<p>Insert a new paragraph after 2.20 to read: <u>Reference is also made to the UK Marine Policy Statement, which the Council will have regard to, along with marine plans and designations, as these are developed, to ensure integration with the marine planning regime.</u></p>
Chapter 4 – Main Issues				
4		MOD 4.1	p18	<p>Delete the 2nd paragraph under 10) ‘Managing Uncertainties’ and replace with new text:</p> <p>[Delete] The most significant infrastructure uncertainty relates to the impending decision on the Bexhill to Hastings Link Road. Planning permission was granted in July 2009, but the Secretary of State’s decision following the Compulsory Purchase Order Inquiry has been delayed by the Government in the light of the review of public sector spending. The outcome will be known by the end of 2011. A significant delay, or cancellation, would have clear implications on the strategy as well as on housing and delivery and job creation. This is considered more fully in Chapters 7 and 8.</p> <p>[Insert] During preparation of this Strategy the most significant uncertainty related to the Bexhill to Hastings Link Road. However, following planning permission in July 2009 the Secretary of State has approved the Compulsory Purchase Orders and granted final funding approval. Construction is now underway. Hence, there is now no need for related contingencies. It is scheduled to be completed in April 2015.</p>
Chapter 7 – Overall Spatial Strategy				
5		MOD 7.1	p29	<p>Delete paragraph 7.10 and replace with new text:</p> <p>[Delete] 7.10 The South East Plan sets a target for Rother district to provide 5,600 net additional dwellings between 2006 and 2026 as an appropriate contribution to the wider demand for housing. As explained in chapter 3, the South East Plan currently provides the statutory context for local planning, and hence is the starting point for consideration of the scale of housing growth appropriate locally. It further highlights that there have been significant changes in circumstances since the South East Plan was prepared, and adopted. These have warranted a fuller review of the appropriate scale of development for the district.</p> <p>[Insert] 7.10 Following the revocation of the South East Plan, the scale of growth needs to have due regard to the policies contained in</p>

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				the National Planning Policy Framework. The key policy reference is paragraph 47; this states that Local Plans should meet the full objectively assessed need for market and affordable housing as far as is consistent with other policies of the Framework. In accordance with this, the Council, together with Hastings Borough Council, commissioned a Strategic Housing Market Assessment (SHMA) Update in June 2013, specifically to provide a housing needs assessment. For Rother, this identified a need for 6,180 net additional dwelling over the plan period to meet the demographic trend-based assessment of need. This level of growth would also readily meet both the economic and local housing needs for new dwellings. This can be compared to a level of growth of some 4,800 dwellings previously required under the South East Plan. The capacity to accommodate this level of housing growth, as well as any shortfall in capacity in Hastings Borough, having due regard to sustainability considerations is summarised below.
6		MOD 7.2	p30	<p>Insert an additional paragraph after 7.14 to read:</p> <p>[Insert] Whilst the amount of proposed housing development has increased since the above study, this scale of employment land release is still regarded as an appropriate minimum on the basis that it is well above trend-based forecasts and, hence, an aspirational but achievable target. Overall economic policies are set out in Chapter 16, while the scope for further employment development in rural areas is considered in Chapter 12.</p>
7		MOD 7.3	p31	<p>Add the following sentence to the end of paragraph 7.21:</p> <p>7.21 A range of factors need to be balanced to determine the most appropriate scale of residential development, with 'drivers' for growth on the one hand, including demographic projections and housing market pressures, and supply constraints, notably environmental designations and infrastructure availability on the other. Critical in balancing these is the vision that local communities have for their area. These factors are reviewed, and their implications for housing development reassessed, in the Background Paper on 'Overall Housing Provision'. [Insert] A further assessment, which reviews both the more recent SHMA Update 2013 and the SHLAA Review 2013, is set out in the 'Summary Appraisal of Housing Growth Potential', (July 2013).</p>
8		MOD 7.4	p31	<p>Delete paragraphs 7.22 and 7.23 and replace with new text:</p> <p>7.22 This assessment, supported by the Sustainability Appraisal, concludes that the South East Plan requirement for 5,600 dwellings to be built in Rother 2006—2026 (with over 70% in the coastal parts, mainly Bexhill) is no longer sustainable.</p> <p>7.23 There are two main reasons for this; firstly, the South East Plan assumed that the Bexhill to Hastings Link Road would be built by now, yet the earliest it can now be built is the very end of 2014. Secondly, the recent recession and on-going weak national economic growth forecasts, mean that the prospect of actually increasing on past build rates, as implied by the South East Plan target of 280 dwellings/year) (compared to actual house building between 1991 and 2011 of only 245 dwellings per year), is both likely to be unduly optimistic and, moreover, unlikely to be matched by requisite job growth.</p> <p>[Insert] 7.22 Sustainability Appraisals have been prepared alongside successive iterations of the Strategy. In the light of the SHMA Update 2013, the Sustainability Appraisal of the Proposed Submission Core Strategy is supplemented, in respect of the potential for further housing development, by a 'Sustainability Appraisal of the Council's proposed revised modifications'. This most recent Appraisal supports the planned level of housing growth, recognising that it is higher than that previously proposed, largely on the basis of the greater weight given to housing objectives. However, it also concludes that higher levels of housing, which would fully meet the housing needs assessment for Rother, and potentially contribute to wider housing needs, would be unsustainable.</p> <p>7.23 The main reasons for this are, firstly, that the potential for housing growth at Bexhill is as much as is likely to be achievable in housing market terms. There are also increasing uncertainties in overcoming transport capacity constraints and in achieving job growth, such that the key objective of a better balance between homes and jobs is increasingly compromised. Secondly, the potential for further growth elsewhere is seen as impacting increasingly, and significantly, on environmental designations, most notably on the conservation of the natural beauty of the High Weald AONB. Further detail about the distribution of housing growth is set out in the following section.</p>
9		MOD 7.5	p32	Amend paragraph 7.28 to read:

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				It is concluded that an appropriate overall target for net additional housing in the district over the period from April 2011 to March 2028 (17 years) should be [Delete] 3,700—4,100 <ins>[Insert] at least 5,700</ins> dwellings, or an average of [Delete] 218—241 <ins>[Insert] 335</ins> dwellings/year.
10		MOD 7.6	p32	<p>Delete paragraphs 7.29 and 7.30 and replace new text:</p> <p>[Delete] 7.29 For monitoring purposes, including calculation of the housing trajectory and land supply, the mid-point of 3,900 dwellings (an average of 229 dwellings/year) will be applied.</p> <p>7.30 It is noted that, allowing for completions 2006-2011, the above housing figures represent 81%-88% of the South East Plan target 2006-2026. The reasons for this lower housing target are fully set out in the Background Paper on 'Overall Housing Provision', but most critically relate to delay in construction of the Bexhill to Hastings Link Road (upon which it is still contingent, as discussed further below), lower economic growth and more detailed investigations.</p> <p><ins>[Insert] 7.29 This represents a substantial increase on previous rates of housebuilding, being 37% higher than the average of 245 dwellings per year (1991-2011). In fact, given the low rate of housing completions in the first two years of the plan period (275 dwellings), the actual rate of housing now required 2013-2028 (of 362 dwellings per year), represents an increase of 48% on past rates. Hence, and notwithstanding the constraining environmental factors, the District will see a significant boost in housing supply over the plan period.</ins></p> <p><ins>7.30 This growth is justified primarily in terms of contributing to the projected demand for new homes, as well as in meeting the local need for housing and the need to support economic regeneration. The possibility of further opportunities for sustainable housing (as well as employment) development arising over time cannot be ruled out; hence, the requirement is expressed as a minimum for the purposes of plan-making. These will be further assessed as part of site allocations/neighbourhood planning processes.</ins></p>
11		MOD 7.7	p33	<p>Delete the second sentence of paragraph 7.36 and replace with new text:</p> <p>7.36 In all cases, the distribution of development [Delete] is also [Delete] need <ins>[Insert] needs</ins> to be mindful of valuable environmental and heritage assets, as well as infrastructure availability. [Delete] A better understanding of opportunities for development has been achieved via work on the Strategic Housing Land Availability Assessment (SHLAA). <ins>[Insert] Potential sites to deliver the housing strategy are identified in the Strategic Housing Land Availability (SHLAA) Review 2013. These, as well as other sites, will be further assessed as part of site allocations/neighbourhood planning processes to determine whether, and if so how, they will be duly brought forward. There will be public consultation as part of these processes</ins></p>
12		MOD 7.8	p33	<p>Amend paragraph 7.37 to add additional sentences:</p> <p>7.37 Bexhill was identified for growth in the South East Plan. With worsening levels of deprivation relative to other parts of the country, it remains the case that Bexhill and Hastings need to regenerate economically. Additional transport infrastructure capacity is critical to achieve such growth however.</p> <p><ins>[Insert] This principally relates to the Bexhill Hastings Link Road, for which construction is now underway. A report into 'Housing Delivery in Bexhill and Hastings' concludes that the town may grow at a much increased rate than in the past, while a Transport Study shows this to be possible, subject to further assessment. The SHLAA Review 2013 indicates the potential for growth. At the same time, the degree of growth proposed is at a level that does not undermine the key local objectives to improve the balance of homes and jobs and to retain the town's "sense of place".</ins></p>
13		MOD 7.9	p33	<p>Amend paragraph 7.39 to add an additional sentence:</p> <p>7.39 The opportunities for further development at Rye are very limited by its historic form and topographic setting, as well as the virtual enveloping presence of international nature conservation designations, the AONB and flood risk areas (which also affect parts of the town</p>

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				itself). Added to this, the town seeks to prioritise social and economic challenges and, like Battle, manage its very important heritage. The SHLAA identified very little potential for further outward growth, while the yield from existing allocations may not fully materialise. [Insert] For both towns, the SHLAA Review 2013 indicates some potential for further housing via redevelopment within both commercial and residential areas, although the prospects for this requires further assessment.
14		MOD 7.10	p34	<p>Add a sentence to the end of paragraph 7.40 to read:</p> <p>7.40 A much more limited estimate of the potential for sustainable growth in the Hastings Fringes has emerged in the latter stages of the Core Strategy. Most notably, a large scale site at Breadsell Farm promoted in the draft Hastings Core Strategy, which would have justified some development on adjoining land in Rother district, is no longer being promoted by the Borough Council. Also, the prospect of a new railway station in at Wilting (which may have facilitated some housing development) has also receded with publication of Network Rail's development strategy. [Insert] While current evidence does not support the identification of development at Breadsell Farm, given the housing land supply position, relevant policies are framed in such a way as to not rule out the longer-term prospect of a sustainable scheme if the environmental, access to services and transport constraints were satisfactorily addressed.</p>
15		MOD 7.11	p34	<p>Add a sentence to the end of paragraph 7.41 to read:</p> <p>7.41 Rural communities in particular are keen to ensure that development in villages contributes to their character and sustainability of services, as well as meets local needs (such as for affordable housing, play areas, community halls, etc). Hence, development in rural areas should be set at a level which allows for limited growth, reflecting individual settlement's needs, opportunities and service provision. [Insert] At the same time, the housing provisions seek to maximise the contribution that the villages can make to sustainable growth without prejudicing their individual character and amenities, as well as those of their shared, for the most part High Weald AONB, landscape setting.</p>
16		MOD 7.12	p34	<p>Amend Policy OSS1(i) and (ii) to read:</p> <p>Policy OSS1: Overall Spatial Development Strategy</p> <p>The Strategy for the Overall Spatial Development is to:</p> <p>(i) Plan for [Delete] an additional 3,700 – 4,100 [Insert] at least 5,700 dwellings (net) in the district over the period 2011-2028;</p> <p>(ii) Plan for [Delete] some [Insert] at least 100,000 square metres of gross additional business floorspace;</p> <p>(iii) Identify suitable sites in accordance with the following spatial distribution:</p> <p>(a) focus new development at Bexhill, giving particular attention to promoting economic regeneration and growth of the Hastings and Bexhill area, including through mixed use developments;</p> <p>(b) provide for some development in Battle and Rye that helps maintain their small market town roles and is consistent with their respective environmental constraints and settings;</p> <p>c) facilitate the limited growth of villages that contain a range of services and which contributes to supporting vibrant, mixed rural communities, notably in relation to service provision and local housing needs, and is compatible with the character and setting of the village;</p> <p>(d) allow for small-scale infill and redevelopment, and otherwise enable local needs for housing and community facilities to be met, in other villages; and</p> <p>(e) give particular attention to the ecological, agricultural, public enjoyment and intrinsic value of the countryside, and continue to generally restrict new development to that for which a countryside location is necessary or appropriate to promoting sustainable land-based industries and sensitive diversification, primarily for employment uses.</p>
17		MOD 7.13	p35	<p>Amend the first sentence of paragraph 7.44 to read:</p> <p>7.44 As stated above, the level of housing growth in line with this strategy is [Delete] set as a range, 3,700 – 4,100 [Insert] at least 5,700 dwellings. This also provides a degree of flexibility when individual sites are assessed. The exact distribution will be refined when allocations are subsequently [Delete] out [Insert] brought forward.</p>

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18		MOD 7.14	p35	<p>Amend Figure 8 to read:</p> <table border="1"> <thead> <tr> <th colspan="3">Approximate development levels 2011-2028</th> </tr> <tr> <th></th> <th>Housing</th> <th>Employment</th> </tr> </thead> <tbody> <tr> <td>Bexhill</td> <td>[Delete] 2,050 – 2,250 [Insert] 3,100¹ dwellings</td> <td>[Insert] At least 60,000sq.m.</td> </tr> <tr> <td>Hastings Fringes</td> <td>[Delete] 45 – 80 [Insert] 100 - 250 dwellings</td> <td>At least 3,000sq.m.</td> </tr> <tr> <td>Battle</td> <td>[Delete] 400 – 440 [Insert] 475-500 dwellings</td> <td>[Insert] At least 10,000sq.m.*</td> </tr> <tr> <td>Rye</td> <td>[Delete] 250 – 350 [Insert] 355-400 dwellings</td> <td>[Insert] At least 10,000-20,000sq.m.</td> </tr> <tr> <td>Villages</td> <td>[Delete] 950 – 1,000 [Insert] 1,670 dwellings</td> <td>[Insert] At least 10,000sq.m.</td> </tr> <tr> <td>Total</td> <td>[Delete] 3,700 – 4,100 [Insert] At least 5,700 dwellings</td> <td>[Insert] At least 93,000 – 103,000sq.m.</td> </tr> </tbody> </table> <p>(* includes sites on Marley Lane)</p>	Approximate development levels 2011-2028				Housing	Employment	Bexhill	[Delete] 2,050 – 2,250 [Insert] 3,100 ¹ dwellings	[Insert] At least 60,000sq.m.	Hastings Fringes	[Delete] 45 – 80 [Insert] 100 - 250 dwellings	At least 3,000sq.m.	Battle	[Delete] 400 – 440 [Insert] 475-500 dwellings	[Insert] At least 10,000sq.m.*	Rye	[Delete] 250 – 350 [Insert] 355-400 dwellings	[Insert] At least 10,000-20,000sq.m.	Villages	[Delete] 950 – 1,000 [Insert] 1,670 dwellings	[Insert] At least 10,000sq.m.	Total	[Delete] 3,700 – 4,100 [Insert] At least 5,700 dwellings	[Insert] At least 93,000 – 103,000sq.m.
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19		MOD 7.15	p36	<p>Delete paragraph 7.49 and amend paragraph 7.50 to read:</p> <p>[Delete] 7.49 The overall spatial strategy advocates a total of 3,700 – 4,100 net additional dwellings over the period 2011 to 2028.</p> <p>7.50 The table at Appendix 3 summarises the local housing targets together with the housing land supply position at April 2011. Taking account of outstanding planning permissions, there is a need to provide for a [Delete] further 2,400-2,800 [Insert] 4295* dwellings in the District as a whole between 2011 and 2028.</p> <p>[Insert] Footnote* 4,295 comprises 3,770 (total allocations required lower end of range), plus 65 exception sites, plus 460 small site windfalls.</p>																								
20		MOD 7.16	p36	<p>Amend paragraph 7.51 to read:</p> <p>7.51 Sites for new development will be set out in due course through a Development and Site Allocations [Delete] DPD [Insert] Plan and Neighbourhood Plans. Existing Local Plan housing (and other) allocations will be subject to review as part of [Delete] the Site Allocations DPD [Insert] these processes. These allocations amount to some [Delete] 4,750 [Insert] 1,607 dwellings which, if these are all carried forward, would still require some additional [Delete] 770 – 1,170 [Insert] 2,688* dwellings need to be planned for to meet the overall target.</p> <p>[Insert] Footnote* 2,688 comprises 2,163 (total allocations required lower end of range), plus 65 exception sites, plus 460 small site windfalls.</p>																								
21		MOD 7.17	p36	<p>Delete paragraphs 7.52 and 7.53 and replace with new text:</p> <p>[Delete] 7.52 Government Guidance in PPS3 expects local planning authorities to identify sufficient sites to meet its housing requirements for 15 years from the date of adoption, of which at least 5 years are capable of immediate development. This means that while sites with outstanding planning permissions contribute to the requirement, no allowance is normally allowed for future windfall sites.</p> <p>7.53 PPS3 states 'Allowances for windfalls should not be included in the first 10 years of land supply unless Local Planning Authorities can</p>																								

¹ Subject to the outcome of an ongoing transport capacity study

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				<p>provide robust evidence of genuine local circumstances that prevent specific sites being identified’.</p> <p>[Insert] 7.52 Government policy in the National Planning Policy Framework states that: “Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply.” It adds that: “Any allowance should be realistic, having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.”</p>
22		MOD 7.18	p37	<p>Delete paragraphs 7.56 and paragraph 7.57 and replace with new text to read:</p> <p>[Delete] 7.56 However, there are several reasons that suggest that even small windfall sites will not continue at the same rate as has been experienced over the previous years. These reasons include:</p> <ul style="list-style-type: none"> (i) A less buoyant housing market, the effects of which are likely to be felt in the opening years of the plan period; (ii) Changes to the PPS3 definition of ‘previously developed land’; meaning that there is not the same presumption nationally that garden land, which has been a significant source of windfall sites, may be developed residentially; (iii) The continuing reduction of the stock of suitable building, including former agricultural buildings. <p>7.57 Given Rother’s past record of windfall development, some small allowance for windfalls in the last five years of the plan period is appropriate. This ‘windfall allowance’ is equivalent to a much lower rate than has been experienced in recent years within the district, thus acknowledging that they will not necessarily continue at the same rate. On the basis of a 50% fall in past (2000-2010) small sites windfalls, a total windfall allowance would amount to 225 dwellings. Hence, the outstanding requirement for further allocations is at least 550-950 dwellings</p> <p>[Insert] 7.56 Given Rother’s past record of fairly consistent small site windfall developments, an allowance for these is made in years 5-10 and 10-15, at rates of 47 dwellings and 45 dwellings a year respectively. This compares with some 90 dwellings a year on small site windfalls over the period 2000 -2010. The future allowances do not include any provision for redevelopment on garden land. Further allowance may be made for the delivery of affordable housing “exception sites” in accordance with the Council’s programme. This amounts to some 65 dwellings, all of which would be in the rural areas. This programme is underway with several sites currently being progressed.</p> <p>7.57 Taking the above windfall allowances into account, the outstanding requirement for further allocations is some 2,163 dwellings.</p>
23		MOD 7.19	p37	<p>Add a sentence to the end of paragraph 7.58 to read:</p> <p>7.58 The Council will continue to monitor and review the contribution of windfalls to overall supply and the extent to which they may either reduce the need for allocations, impact on the need to release sites, or provide a contingency for certain sites not being developed. [Insert] Particular attention will be given to the incidence of large windfall sites, which may increase the actual scale of housing growth over the plan period.</p>
24		MOD 7.20	p38	<p>Delete Policy OSS2 ‘Bexhill to Hastings Link Road and development’ and its supporting text at paragraphs 7.60-7.66.</p> <p>[Delete] Bexhill Hastings Link Road</p> <p>7.60 The greatest risk to achieving the level of development that the strategy seeks arises from further delay, or cancellation, of the Bexhill Hastings Link Road, presently scheduled for opening at the end of 2014.</p> <p>7.61 Transport assessments confirm the views of the highway authorities that the existing highway capacity would not support the proposed growth of Bexhill, in combination with that in Hastings, and that the construction of the Link Road will provide the necessary capacity; it follows</p>

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				<p>that the scale of development at Bexhill would be curtailed, largely irrespective of siting, due to the inevitable exacerbation of congestion on the A259 between the town and Hastings and on the wider network without the Link Road.</p> <p>7.62 Of wider significance, any delay or cancellation of the Link Road would have significant consequences on the area's capacity for economic growth — which is a priority.</p> <p>7.63 At this point, the County Council, as scheme promoter, has indicated its strong commitment to the Link Road, which has planning permission, such that there is a sufficient degree of certainty to plan on the basis of its timely construction.</p> <p>7.64 Notwithstanding this, regard is given to the potential for slippage, which would occur if the Secretary of State does not approve the scheme in the current bidding round.</p> <p>7.65 The response to this situation should recognise that higher levels of growth at both Battle and Rye would not be sustainable, while diverting further growth to villages would be incompatible with the strategy for limited growth of villages, and the priority to conservation of the High Weald AONB.</p> <p>7.66 It should also recognise the potential benefits of development, especially for employment uses, to Bexhill. This leads towards maximising the capacity of the existing transport network and facilitating ready access by other means of travel, especially along the main corridors.</p> <p>Policy OSS2: Bexhill to Hastings Link Road and development</p> <p>Early construction of the Bexhill to Hastings Link Road is strongly supported as an integral, and critical, component of the development strategy for Bexhill and for the economic regeneration of the wider area.</p> <p>In the event that the Link Road is significantly delayed or not built, then the following amendments to the overall development strategy will apply:</p> <p>(i) The potential to achieve construction later in the plan period will be reviewed in conjunction with East Sussex County Council;</p> <p>(ii) The development targets for Bexhill will be reduced (as will those for the district in line with this), but that the development requirements for other towns and villages will be unaffected;</p> <p>(iii) For Bexhill:</p> <p>(a) continue to promote strategy elements not dependent upon the Link Road, as highlighted in chapter 8;</p> <p>(b) not release the already allocated major greenfield sites for housing or business development at North East Bexhill until construction is confirmed, subject to the potential for a partial release if it is satisfactorily demonstrated that the transport impact is acceptable;</p> <p>(c) not release other major greenfield sites for housing or business development, subject to (d) below;</p> <p>(d) determine the actual scale of development allowable without the Link Road in conjunction with East Sussex County Council and Hastings Borough Council, and for this to inform development allocations across the town within the Development and Site Allocations DPD, having full regard to the potential for non-car travel and site specific circumstances;</p> <p>(e) subject to (d) above, assume a continuation of a pre-Link Road development rate, as set out in chapter 8, for development planning and monitoring purposes.</p>
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27		MOD 8.1	p48	<p>Delete part (v)(b) of Policy BX1: Overall Strategy for Bexhill</p> <p>Policy BX1: Overall Strategy for Bexhill</p> <p>The overall strategy to deliver the objectives for Bexhill is to:</p> <ul style="list-style-type: none"> (i) Conserve and enhance the town's distinct and independent character and residential function, supported by local services and jobs as much as possible; (ii) Develop local amenities, including support for community activities and facilities, learning opportunities, and improved sports and leisure facilities, including a new leisure/swimming centre, and a network of accessible green space around the town, as well as by implementation of a Countryside Park at Pebsham; (iii) Promote the economic growth of the town, and wider area, including through encouraging growth in new and established local firms, especially in high value-added sectors, prioritising development for employment purposes, increasing the supply of land and premises and promoting efficient infrastructure; (iv) Give priority to improving welfare and economic opportunities in more deprived areas, including by assessing the impacts of development proposals on more vulnerable groups and areas; (v) Improve road, rail, bus and cycling access within Bexhill and between the town and Hastings, via an integrated sustainable local transport strategy for the Bexhill and Hastings area, key elements of which will be: <ul style="list-style-type: none"> (a) the Bexhill to Hastings Link Road, associated 'greenway' and new 'quality bus corridors'; (b) [Delete] provision for a new railway station adjacent to Ravenside Retail Park; (c) a cycle network that focuses on 'utility' routes to the town centre, schools, colleges and workplaces, and recreational routes into the Countryside Park and along the seafront; (vi) Strengthen the town centre's role, both as a commercial and cultural centre, in accordance with Policy BX2; (vii) Provide for employment and housing growth, in accordance with Policy BX3, with particular regard to the needs of families, affordable housing for younger people and a range of supported housing options for older households.
28		MOD 8.2	p49	<p>Amend text at paragraph 8.36</p> <p>8.36 There is retail investment potential in the town, as highlighted in the 'Shopping Assessment'. This identified a capacity for some additional [Delete] 2,500 m² <ins>[Insert] 2,000 m²</ins> retail floorspace for convenience (i.e. day-to-day) goods and 4,000 m² floorspace for comparison goods. The challenge is to provide the space for growth in and around the town centre, and the trading conditions and environment that will attract operators.</p>
29		MOD 8.3	p50	<p>Amend text at Policy BX2 (iii)</p> <p>Policy BX2: Bexhill Town Centre</p> <p>The Strategy for Bexhill Town Centre is to:</p> <ul style="list-style-type: none"> (i) Promote a co-ordinated town centre initiative to improve its use for shopping, services and leisure, including through investment in the public realm, increased parking capacity, links to the seafront, activities and marketing; (ii) Develop a holistic pedestrian and traffic management strategy that combines improved accessibility for buses and additional parking capacity with ensuring a more attractive shopping environment; (iii) Provide for some [Delete] 2,500 sq m <ins>[Insert] 2,000 sq m</ins> additional convenience goods and 4,000 sq m 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; (iv) Provide for hotel accommodation, well related to the town centre and/or the De la Warr Pavilion; (v) Facilitate leisure, office and high quality residential developments within walking distance of the centre;

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				(vi) Ensure that development and change respects and, where appropriate, enhances the late Victorian/Edwardian character of the Conservation Area.
30		MOD 8.4	p51	<p>Delete paragraphs 8.48, 8.49 and 8.50, and replace with following text:</p> <p>[Delete] 8.48 To date, the scale of development envisaged at Bexhill has been predicated upon early construction of the Bexhill to Hastings Link Road. (The earlier 'Consultation on Strategy Directions' put forward some 3,100-3,300 dwellings in the town over 20 years to 2026, but this assumed the Link Road would be open in 2012/13.</p> <p>8.49 The present position is that the Link Road is in a 'pool' of transport schemes competing for Government funding, with a decision expected by the end of 2011. Therefore, it is not guaranteed. However, set against this, not only is the construction of the Link Road consistent with the established Local Plan strategy for the town and will greatly support the strategy advocated here for the next 15 years, it has planning permission, and is being vigorously promoted by East Sussex County Council.</p> <p>8.50 Therefore, the preferred strategy charts the development plans for the town assuming construction of the Link Road. At the same time, the strategy sets out priorities for development and change in advance of the Link Road opening, which is expected to be at the end of 2014/early 2015, given a favourable Government decision, as well as the approach to any delay in opening.</p> <p>[Insert] 8.48 However, looking forward, the current substantial highway limitations will be addressed when the Bexhill to Hastings Link Road is completed, currently scheduled to be in April 2015.</p>
31		MOD 8.5	p51	<p>Amend text at paragraph 8.51:</p> <p>8.51 Delay in opening the Link Road impacts on the [Insert] timing and, hence, overall quantum of housing growth, as the Highways Authorities have indicated that they do not believe that large new sites can be built ahead of the Link Road. The weakened property market following the recession also lessens the prospects for a high level of house building. [Insert] The prospects for increased housebuilding following the decision to build the Link Road has been undertaken. This report on 'Housing Delivery in Bexhill and Hastings' recognises developers' plans to bring significant developments forward. It concludes that, over the remaining plan period, a housebuilding rate of up to 200 dwellings per year could be achieved.</p>
32		MOD 8.6	p51	<p>Amend paragraph 8.52 to read:</p> <p>8.52 [Delete] Therefore, and given likely employment growth, a [Insert] A housing target of [Delete] some 2,150 [Insert] 3,100 new dwellings between 2011 and 2028 is considered appropriate, and equates to an average of some [Delete] 129 [Insert] 182 dwellings a year [Delete] over the Plan period, which is somewhat above the average house building rate over the last 20 years. [Insert] It is recognised that this is well above the average house building rate over the last 20 years and will place an added weight on initiatives to stimulate job growth. Hence, particular emphasis will be given to schemes that bring significant employment benefits.</p>
33		MOD 8.7	p51	<p>Amend paragraph 8.53 to read:</p> <p>8.53 It is anticipated that [Delete] a lower [Insert] the rate of housing development will [Delete] take place before [Insert] following construction of the Link Road [Delete] , primarily for business land supply and infrastructure reasons, increasing to some 150 dwellings a year in the later phase of the Plan, which is equivalent to the rate of house building over the last 5 years. [Insert] will increase quickly to the annualised target..</p>
34		MOD 8.8	p52	<p>Delete paragraphs 8.54 and 8.55.</p> <p>[Delete] 8.54 Based on the Link Road opening towards the end of 2014, then the projected level of housing growth is:</p> <p>2011 – 2015 (4 years): 300 dwellings @ 75 dwellings/year 2015 – 2016 (1 year): 100 dwellings @ 100 dwellings/year</p>

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				<p>2016 – 2021 (5 years): 700 dwellings @ 140 dwellings/year 2021 – 2028 (7 years): 1,050 dwellings @ 150 dwellings/year</p> <p>8.55 This represents the best estimate for the level of sustainable growth but some flexibility is provided by adopting a range of 2,050 – 2,250 dwellings. This allows for site specific circumstances to be reflected, as well as acknowledging general uncertainties over the potential rate of regeneration and growth.</p>
35		MOD 8.9	p52	<p>Amend paragraph 8.56 to read:</p> <p>8.56 There are outstanding commitments for [Delete] some 300 [Insert] almost 350 dwellings. Deducting these from the total leaves a requirement to identify sites for some [Delete] 1,700–1,900 [Insert] 2,750 additional dwellings.</p>
36		MOD 8.10	p52	<p>Amend paragraph 8.58 to read:</p> <p>8.58 Allowing a reasonable estimate for small sites coming forward, further allocations are needed for some [Delete] 250-450 [Insert] 1,100 dwellings. The SHLAA indicates some potential within the existing built-up area, as well as [Delete] several sites [Insert] and broad locations around the northern and western edges of the town. Development to the east would erode the marginal but critical open countryside gap to Hastings.</p>
37		MOD 8.11	p53	<p>Amend paragraph 8.61 to read:</p> <p>8.61 These areas will be the focus of attention in accommodating the additional housing requirement [Delete] , but The scale, timing and locations will [Insert] ideally be determined at the Site Allocations stage. This is most appropriate time to assess in further detail the key issue of the capacity of the A259 and local roads, as well as specific development issues.</p>
38		MOD 8.12	p53	<p>Amend parts (i), (ii) and (iii) of Policy BX3 Development Strategy to read:</p> <p>Policy BX3: Development Strategy</p> <p>New residential and employment development will contribute to overall strategy for Bexhill through:</p> <ul style="list-style-type: none"> (i) A total of [Delete] some [Insert] at least 60,000 sq m of new business floorspace, focused on new strategic employment areas associated with construction of the Link Road, with further provision in and adjacent to the town centre and as part of other developments; (ii) An overall level of housing growth of [Delete] some 2,050–2,250 [Insert] 3,100 dwellings between 2011-2028 [Delete] , the precise number being dependent upon the timing of construction of the Link Road, but will accord broadly with the phasing set out at paragraph 8.54; (iii) Over and above development opportunities within the existing urban area, new housing and business development will be focussed on a strategic site to the north east of the town (as already planned), together with further sites to the north and west of the town, the scale, timing and locations of which will [Insert] ideally be determined through the Site Allocations process; and (iv) In advance of construction of the Link Road, new opportunities for business growth, including office schemes, will be encouraged mainly within and adjacent to the town centre and existing employment areas.
Chapter 9 - Hastings Fringes				
39		MOD 9.1	p55	<p>Add an additional sentence to the end of paragraph 9.12 to read:</p> <p>9.12 Earlier suggestions for development in the Breadsell Farm and Wilting Farm areas are not being progressed; due primarily to Hastings Borough Council's decision not to pursue the former following advice from Natural England and by the prospects of a new railway station at</p>

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				Wilting being unlikely in the foreseeable future. Notwithstanding this, the Council will work in partnership with key agencies to further investigate the business case for a new station. [Insert] In addition, while current evidence does not support the identification of development at Breadsell Farm, given the housing land supply position, provision is made for a sustainable scheme to come forward in the longer term at Breadsell Farm if the environmental, access to services and transport constraints were satisfactorily addressed. This is provided for by a range of housing growth that allows for up to 150 dwellings above the base target, to reflect the potential on the Rother part of any future comprehensive development.
40		MOD 9.2	p56	Amend paragraph 9.15 to reflect revised housing numbers: 9.15 The Strategic Housing Land Availability Assessment (SHLAA) [Insert] Review 2013 identified only [Delete] little [Insert] limited potential for sustainable housing development along the fringe in recognition of the constraints in this area. Hence, housing numbers are limited to [Delete] 45-80 [Insert] 100-250 dwellings, some of which will be achieved through outstanding permissions [Insert] with the potential to achieve higher number in the range being provided in the event that a comprehensive scheme, which is dependent on land coming forward in Hastings Borough, at Breadsell Farm, as discussed above.
41		MOD 9.3	p56	Amend Policy HF1 (vi) to read: Policy HF1: The Hastings Fringes The strategy for conservation and development in the Hastings Fringes is to: (i) Continue to develop proposals for the establishment of the Pebsham Countryside Park between Bexhill and Hastings, including through securing appropriate developer contributions; (ii) Take a holistic approach to the use and management of land between Ivyhouse Lane and Rock Lane to secure environmental and access improvements in association with any development in the locality; (iii) Maintain strategic countryside gaps between Hastings/St Leonards and Bexhill, Battle, Crowhurst and Fairlight; (iv) Further investigate opportunities to improve access to the A21 at Baldslow, including through bus improvements; (v) Retain and give priority to further employment creating development of at least 3,000 sq m, primarily by the expansion of existing sites, subject to satisfactory landscape impact and access arrangements; (vi) Provide [Delete] 45-80 [Insert] 100-250 net additional dwellings between 2011-2028.
Chapter 10 – Rye and Rye Harbour				
42		MOD 10.1	p61	Amend the penultimate sentence of paragraph 10.12 and add an additional sentence: 10.12 Due to its topographical and landscape context and statutory designations, Rye is heavily constrained and further opportunity for development on the periphery of the town is confined. The strategy for Rye and Rye Harbour is the development of key development sites and infill within the built up urban area. In the Strategy Directions Plan the level of housing growth for Rye and Rye Harbour is derived from assessment of the district-wide spatial distribution options and based upon the relative service roles of towns and villages in the district recommended 450 dwellings in the plan period. Given the environmental constraints surrounding Rye; the uncertainty surrounding the deliverability of existing allocations and limited opportunity within the existing built up environment it would be appropriate to adopt a range for housing growth to allow for some flexibility. An appropriate range for housing growth in Rye and Rye Harbour will be [Delete] 250-350 [Insert] 355 - 400 dwellings up to 2028 including existing allocations. [Insert] The range allows for scope to further redevelop existing commercial sites for mixed use, subject to detailed assessment. See Appendix 3 for components of housing supply.) The process of identifying key sites suitable for development will be undertaken in the Site Allocations Development Plan Document.
43		MOD 10.2	p62	Amend the second sentence of paragraph 10.15 to read:

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				10.15 The main employment area in the area is Rye Harbour Road. Rye Commercial activity on Rye Harbour Road supports approximately 10% of the total jobs in Rye and the surrounding areas Approximately <ins>At least</ins> 10,000 sq m of land <ins>floorspace</ins> for employment is appropriate for the Rye <ins>and the Harbour Road</ins> area within the plan period ¹⁶ . Further work on suitable sites will be investigated in the Site Allocation DPD <ins>Plan</ins>
44		MOD 10.3	p62	<p>Add a sentence to the end of paragraph 10.16 to read:</p> <p>10.16 Employment will continue to centre on Rye Harbour Road industrial estate and consolidating the activities of the Port of Rye. The Council's strategy focuses on maintaining and strengthening Rye's main employment areas, whilst allowing a range of other sites to develop in order to provide a variety of opportunities. These are considered the most sustainable locations for employment and provide significant new employment opportunities. <ins>Consideration will be given to the potential for mixed use developments in some locations, including along Winchelsea Road, in order to make most effective use of urban land.</ins></p>
45	FA4, FA5	MOD 10.4	p64	<p>Amend Policy RY1 (v) to read:</p> <p>Policy RY1: Policy Framework for Rye and Rye Harbour</p> <p>Proposals for development and change in Rye and Rye Harbour Village will:</p> <ul style="list-style-type: none"> (i) Promote efficiencies and improvements to the strategic transport network to improve connectivity between Rye and other major urban centres; (ii) Support traffic management on the local road network, promote sustainable alternatives to the car and implement the objectives stated in Local Transport Plan 3 and the Rye Local Area Transport Strategy; (iii) Preserve and enhance the character and historic environment of the Citadel <ins>and wider Conservation Area</ins>, and the wider <ins>distinctive</ins> landscape setting of the town whilst retaining the centre of Rye as the main focus for retail and services for the town; (iv) <ins>Retain the centre of Rye as the main focus for retail and services for the town,</ins> and increase the choice of convenience shopping in Rye by facilitating the increase of some 1,650sq m net additional convenience floorspace within or adjacent to the town centre; (v) Provide between 250 and 350 <ins>355-400</ins> dwellings net additional dwellings between 2011 and 2028. Opportunities for growth will primarily be sought within the built up area of Rye; (vi) Seek to secure and maintain effective flood defences for Rye and Rye Harbour, whilst also minimising and managing flood risk, including in relation to the location of new development in accordance with other criteria; (vii) Promote at least 10,000 sq m of employment floorspace at Rye Harbour Road industrial estate to promote economic regeneration and job creation, having particular regard to protecting the integrity of internationally designated habitats; (viii) Maintain and enhance navigation on the River Rother and the viability of the Port of Rye as a working harbour, having particular regard to protecting the integrity of internationally designated habitats; (ix) Promote green tourism initiatives, including the careful management of Rye Harbour Nature Reserve <ins>and, where feasible, new habitat creation and green infrastructure linkages</ins>, that protects and enhances the integrity of the internationally important ecological interests; (x) Tackle social exclusion and promote opportunities for young people to access education, community facilities, employment and leisure; (xi) Maintain and enhance the community, cultural and tourism assets of both Rye and Rye Harbour village; and (xii) Maintain a strategic gap between Rock Channel and the industrial estate at Rye Harbour Road.

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46		MOD 11.1	p67	<p>Amend paragraph 11.8 to read:</p> <p>11.8 The level of housing growth for Battle identified by assessment of the district-wide spatial distribution options <ins>opportunities</ins> and based upon the relative service roles of towns and villages in the district suggested 400-440 <ins>suggests 475-500</ins> dwellings to Battle over the Plan period <ins>particularly if there is found to be redevelopment potential in some broad locations.</ins> (an average 25 dwellings per annum). As evidenced in the Battle Town Study, Battle has a significant local housing need. The level of proposed development, coupled with effective affordable housing policies (see section 14) should greatly assist affordable housing to come forward.</p>
47		MOD 11.2	p68	<p>Amend the second sentence of paragraph 11.13 to read:</p> <p>11.13 For the local economy, it is important to encourage and support innovation and entrepreneurial activity. Approximately <ins>At least</ins> 10,000 sq m of land <ins>floorpace</ins> for employment is appropriate for the Battle area to 2026 <ins>2028</ins> There is some 7,000 sq m in the pipeline along Marley Lane and Rutherfords Business Park which serves the Battle employment market. Broadly speaking, this leaves a requirement for at least a further 3,000 sq.m, which would seem an appropriate target both to secure further land/premises for employment use, in keeping with the scale of housing growth. Sites located in sustainable locations in close proximity to the town centre will be preferred. The Battle Town Study discusses some potential options to meet the needs including the vicinity of Battle Station, and the Site Allocations DPD will investigate these further.</p>
48		MOD 11.3	p70	<p>Amend Policy BA1 (iii) and (iv) to read:</p> <p>Policy BA1: Policy Framework for Battle</p> <p>Proposals for development and change in Battle will:</p> <ul style="list-style-type: none"> (i) Maintain the essential physical form, local distinctiveness, character and setting of the town, particularly in and adjacent to the Conservation Area; (ii) Implement the ESCC Battle Local Area Transport Strategy, particularly measures that minimise the demand for cross-town vehicular traffic; and improve pedestrian and cycle access to services/ facilities from new and existing development; (iii) Provide for 400-440 <ins>475-500</ins> net additional dwellings in Battle over the Plan period 2011-2028, by developing new housing via opportunities both within the development boundary, and modest peripheral expansion opportunities that respects the setting of Battle within the High Weald AONB and supports community facilities; (iv) Enable new local employment opportunities by providing for some <ins>at least</ins> 10,000 sq m of employment floorpace within the town centre, adjacent to Station Approach, at sites on Marley Lane and at other sites as necessary (including by assessing the potential for mixed use with housing development); (v) Enable growth in sustainable tourism by allowing the development of new tourist accommodation, particularly by the conversion and extension of suitable properties closely related to the town centre; (vi) Maintain a vibrant and distinctive town centre and encouraging additional restaurants, cafes and/or retail service establishments as well as seeking opportunities for increased convenience shopping floorpace of some 1,000 sq m sales area within or adjacent to the town centre, as well as facilitating some additional comparison shopping floorpace; (vii) Implement improvements to the provision of open space, sport and recreation facilities, in accordance with adopted standards and strategies; (viii) Ensure that new development does not put pressure on local infrastructure, and that it makes appropriate contribution to community and other infrastructure; (ix) Seek opportunities for habitat creation, restoration and enhancement, particularly in identified Biodiversity Opportunity Areas to the east and west of the town.

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Chapter 12 – Rural Areas				
49		MOD 12.1	p75	Amend paragraph 12.13 to read: 12.13 The district-wide distribution of housing in Section 7 suggests that the villages should accommodate 950-1,000 <ins>1,670</ins> additional dwellings over the period 2011-2028 , which will necessitate new allocations in the area <ins>While</ins> , much of these dwellings have already been accounted for via existing commitments, so that <ins>there is a</ins> the residual requirement for additional allocations is for some 308-358 <ins>800</ins> dwellings 2011-2028 (as set out in Appendix 3).
50		MOD 12.2	p75	Delete paragraph 12.14 and replace with the following: 12.14 It is notable that over the previous twenty year period, growth was significantly higher in rural areas (just under 2,300 dwellings were constructed in the 20 year period 1987-2007). This is an unsustainable trend, and the Sustainability Appraisal indicates that a lower level of growth is appropriate for the rural areas in future years, in order to respect valued landscape, heritage and biodiversity assets. As a consequence, the Core Strategy aims to direct growth towards larger urban centres over the future plan period, whilst facilitating a sufficient level of development to maintain rural needs. <ins>This level of new housing in the rural areas, which is higher than in earlier versions of the Strategy, responds to the need to maximise opportunities for sustainable growth and the further assessment of the potential sites through the SHLAA Review 2013. This level of growth is supported by the most recent Sustainability Appraisal, which also highlighted the increasing negative impacts of development on the character of both individual villages and of the wider countryside, virtually all of which contributes to the landscape and scenic quality of the High Weald Area of Outstanding Natural Beauty.</ins>
51		MOD 12.3	p76	Add a sentence to the end of paragraph 12.22 to read: 12.22 The occupancy rate of business space in the rural areas is comparatively high. Evidence in the form of an Employment Strategy and Land Review (ELR) suggests the need for new employment floorspace within Rother's rural areas. It is estimated that at least 10,000 sq m additional business floorspace is required in rural localities, preferably within or at least well related to existing village development boundaries. <ins>This is a net requirement and should also take account of the potential loss of some existing business floorspace as a result of recent changes in permitted development rights.</ins>
52	FA6	MOD 12.4	Figure 12 p80	Amend Policy RA1(v) to read: Policy RA1: Villages The needs of the rural villages will be addressed by: (i) Protection of the locally distinctive character of villages, historic buildings and settings, with the design of any new development being expected to include appropriate high quality response to local context and landscape; (ii) Encouragement of high quality sustainable economic growth by the identification of sites for local job opportunities, particularly focussing on the villages listed in Figure 10. This may be achieved by sensitive expansion of existing employment sites, or new sites, particularly for small workshops and office units. Opportunities for business development, including home-working, will also be sought alongside new housing as part of mixed-use allocations where appropriate; (iii) Ensuring thriving and viable rural communities, by retention of, and support for, local shops, <ins>services</ins> and public houses in villages; (iv) Support for community, recreational and educational facilities that provide social and community benefits to villages (including village/community halls and recreation areas). This may include provision of improvements to existing village halls or new halls, as well as support for further community resource centres / hubs, where appropriate;

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				<p>(v) In order to meet housing needs and ensure the continued vitality of villages, the provision of 950-1,000 <ins>1,670</ins> additional dwellings (comprising both existing commitments, and new allocations <ins>and windfalls</ins>) in villages over the Plan period 2011 to 2028. This will be located in accordance with Figure 12, subject to refinement in the light of further investigation via the Development and Site Allocations DPD and/or Neighbourhood Plans;</p> <p>(vi) Improved access to basic day-to-day services, particularly by public transport, walking and cycling. In order to facilitate this, new development will be sited in close proximity to key facilities and in locations accessible via a range of transport options.</p>																																																																																																																																																																																																																																																																																																																																																											
53	FA7 superseded by MOD 12.5	MOD 12.5	p81	<p>Replace Figure 12 with the following revised Figure 12:</p> <p>Figure 12: Distribution of Rural Housing Allocations</p> <table border="1" data-bbox="988 674 1893 1900"> <thead> <tr> <th rowspan="2">Settlement/Area</th> <th rowspan="2">All Completions 2006-2011 (01/04/2006 to 01/04/2011)</th> <th rowspan="2">Commitments 2011 to 2028 (Allocations and Permissions)</th> <th colspan="2">Proposed New Allocations Core Strategy</th> <th colspan="2">Total New Housing 2011-2028 Requirement is 950-1,000</th> </tr> <tr> <th>Low</th> <th>High</th> <th>Low</th> <th>High</th> </tr> </thead> <tbody> <tr><td>Robertsbridge</td><td>14</td><td>59</td><td>50</td><td>60</td><td>109</td><td>119</td></tr> <tr><td>Ticehurst</td><td>79</td><td>10</td><td>35</td><td>55</td><td>45</td><td>65</td></tr> <tr><td>Peasmarsh</td><td>3</td><td>6</td><td>20</td><td>40</td><td>26</td><td>46</td></tr> <tr><td>Hurst Green</td><td>28</td><td>1</td><td>20</td><td>40</td><td>21</td><td>41</td></tr> <tr><td>Broad Oak</td><td>10</td><td>12</td><td>10</td><td>40</td><td>22</td><td>52</td></tr> <tr><td>Northiam</td><td>29</td><td>65</td><td>15</td><td>35</td><td>80</td><td>100</td></tr> <tr><td>Netherfield</td><td>1</td><td>7</td><td>15</td><td>35</td><td>22</td><td>42</td></tr> <tr><td>Catsfield</td><td>4</td><td>7</td><td>0</td><td>30</td><td>7</td><td>37</td></tr> <tr><td>Sedlescombe</td><td>11</td><td>33</td><td>8</td><td>25</td><td>41</td><td>58</td></tr> <tr><td>Camber</td><td>143</td><td>76</td><td>0</td><td>20</td><td>76</td><td>96</td></tr> <tr><td>Westfield</td><td>15</td><td>75</td><td>0</td><td>20</td><td>75</td><td>95</td></tr> <tr><td>Fairlight Cove</td><td>8</td><td>26</td><td>0</td><td>20</td><td>26</td><td>46</td></tr> <tr><td>Etchingham</td><td>3</td><td>18</td><td>0</td><td>15</td><td>18</td><td>33</td></tr> <tr><td>Burwash</td><td>29</td><td>16</td><td>0</td><td>15</td><td>16</td><td>31</td></tr> <tr><td>Crowhurst</td><td>5</td><td>5</td><td>0</td><td>15</td><td>5</td><td>20</td></tr> <tr><td>Iden</td><td>3</td><td>5</td><td>0</td><td>15</td><td>5</td><td>20</td></tr> <tr><td>Staplecross</td><td>4</td><td>4</td><td>0</td><td>15</td><td>4</td><td>19</td></tr> <tr><td>Beckley / Four Oaks</td><td>11</td><td>16</td><td>10</td><td>10</td><td>26</td><td>26</td></tr> <tr><td>Flimwell</td><td>1</td><td>25</td><td></td><td></td><td>25</td><td>25</td></tr> <tr><td>Udimore</td><td>0</td><td>8</td><td></td><td></td><td>8</td><td>8</td></tr> <tr><td>Three Oaks</td><td>3</td><td>6</td><td></td><td></td><td>6</td><td>6</td></tr> <tr><td>Winchelsea Beach</td><td>4</td><td>6</td><td></td><td></td><td>6</td><td>6</td></tr> <tr><td>Burwash Common</td><td>2</td><td>5</td><td></td><td></td><td>5</td><td>5</td></tr> <tr><td>Pett</td><td>12</td><td>4</td><td></td><td></td><td>4</td><td>4</td></tr> <tr><td>Stonegate</td><td>1</td><td>4</td><td></td><td></td><td>4</td><td>4</td></tr> <tr><td>Ashburnham</td><td>3</td><td>3</td><td></td><td></td><td>3</td><td>3</td></tr> <tr><td>Dallington</td><td>0</td><td>3</td><td></td><td></td><td>3</td><td>3</td></tr> <tr><td>Icklesham</td><td>2</td><td>3</td><td></td><td></td><td>3</td><td>3</td></tr> <tr><td>Bodiam</td><td>3</td><td>2</td><td></td><td></td><td>2</td><td>2</td></tr> <tr><td>Brede</td><td>3</td><td>2</td><td></td><td></td><td>2</td><td>2</td></tr> <tr><td>Guestling Green</td><td>6</td><td>2</td><td></td><td></td><td>2</td><td>2</td></tr> <tr><td>Pett Level</td><td>2</td><td>2</td><td></td><td></td><td>2</td><td>2</td></tr> <tr><td>Woods Corner</td><td>2</td><td>2</td><td></td><td></td><td>2</td><td>2</td></tr> <tr><td>Batchelors Bump</td><td>0</td><td>1</td><td></td><td></td><td>1</td><td>1</td></tr> <tr><td>Brightling</td><td>1</td><td>1</td><td></td><td></td><td>1</td><td>1</td></tr> <tr><td>Cackle Street</td><td>9</td><td>1</td><td></td><td></td><td>1</td><td>1</td></tr> <tr><td>Ewhurst</td><td>0</td><td>1</td><td></td><td></td><td>1</td><td>1</td></tr> <tr><td>Mountfield</td><td>0</td><td>1</td><td></td><td></td><td>1</td><td>1</td></tr> <tr><td>Normans Bay</td><td>1</td><td>1</td><td></td><td></td><td>1</td><td>1</td></tr> <tr><td>Burwash Weald</td><td>2</td><td>0</td><td></td><td></td><td>0</td><td>0</td></tr> <tr><td>Fairlight</td><td>0</td><td>0</td><td></td><td></td><td>0</td><td>0</td></tr> <tr><td>Friars Hill</td><td>0</td><td>0</td><td></td><td></td><td>0</td><td>0</td></tr> <tr><td>Johns Cross</td><td>0</td><td>0</td><td></td><td></td><td>0</td><td>0</td></tr> <tr><td>Westfield Lane</td><td>0</td><td>0</td><td></td><td></td><td>0</td><td>0</td></tr> <tr><td>Winchelsea</td><td>0</td><td>0</td><td></td><td></td><td>0</td><td>0</td></tr> <tr><td>Small Site Windfall Allowance in Years 10-15 (2023-2028)</td><td></td><td></td><td></td><td></td><td>118</td><td></td></tr> <tr><td>TOTAL</td><td>457</td><td>524</td><td>183</td><td>505</td><td>825</td><td>1,147</td></tr> <tr><td></td><td colspan="2">Total Completions and Commitments = 981</td><td colspan="2">Mid range = 344 (approx 308-358 required)</td><td colspan="2">Mid range identified is 986</td></tr> </tbody> </table> <p>Note: Figures don't include three exception sites at advanced stages (Brede - 12, Pett - 10 and Ewhurst - 8).</p> <p>Note: Villages in bold text denote a development boundary.</p>	Settlement/Area	All Completions 2006-2011 (01/04/2006 to 01/04/2011)	Commitments 2011 to 2028 (Allocations and Permissions)	Proposed New Allocations Core Strategy		Total New Housing 2011-2028 Requirement is 950-1,000		Low	High	Low	High	Robertsbridge	14	59	50	60	109	119	Ticehurst	79	10	35	55	45	65	Peasmarsh	3	6	20	40	26	46	Hurst Green	28	1	20	40	21	41	Broad Oak	10	12	10	40	22	52	Northiam	29	65	15	35	80	100	Netherfield	1	7	15	35	22	42	Catsfield	4	7	0	30	7	37	Sedlescombe	11	33	8	25	41	58	Camber	143	76	0	20	76	96	Westfield	15	75	0	20	75	95	Fairlight Cove	8	26	0	20	26	46	Etchingham	3	18	0	15	18	33	Burwash	29	16	0	15	16	31	Crowhurst	5	5	0	15	5	20	Iden	3	5	0	15	5	20	Staplecross	4	4	0	15	4	19	Beckley / Four Oaks	11	16	10	10	26	26	Flimwell	1	25			25	25	Udimore	0	8			8	8	Three Oaks	3	6			6	6	Winchelsea Beach	4	6			6	6	Burwash Common	2	5			5	5	Pett	12	4			4	4	Stonegate	1	4			4	4	Ashburnham	3	3			3	3	Dallington	0	3			3	3	Icklesham	2	3			3	3	Bodiam	3	2			2	2	Brede	3	2			2	2	Guestling Green	6	2			2	2	Pett Level	2	2			2	2	Woods Corner	2	2			2	2	Batchelors Bump	0	1			1	1	Brightling	1	1			1	1	Cackle Street	9	1			1	1	Ewhurst	0	1			1	1	Mountfield	0	1			1	1	Normans Bay	1	1			1	1	Burwash Weald	2	0			0	0	Fairlight	0	0			0	0	Friars Hill	0	0			0	0	Johns Cross	0	0			0	0	Westfield Lane	0	0			0	0	Winchelsea	0	0			0	0	Small Site Windfall Allowance in Years 10-15 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				<p>[Insert]</p> <table border="1" data-bbox="988 365 1884 1396"> <thead> <tr> <th>Settlement/Area <small>See Footnote 1</small></th> <th>All Net Completions in Plan Period <small>(01/04/2011 to 31/03/2013)</small></th> <th>Current Commitments <small>See Footnote 2</small></th> <th>Allocations (Remaining from 2006 Local Plan) <small>See Footnote 3</small></th> <th>Potential New Sites <small>See Footnotes 4 & 9</small></th> <th>Total New Housing 2011 - 2028 <small>See Footnote 5</small></th> </tr> </thead> <tbody> <tr><td>Robertsbridge</td><td>2</td><td>6</td><td>47 (+1)</td><td>100</td><td>155</td></tr> <tr><td>Ticehurst</td><td>-10</td><td>6</td><td>0</td><td>87</td><td>83</td></tr> <tr><td>Hurst Green</td><td>0</td><td>6</td><td>0</td><td>75</td><td>81</td></tr> <tr><td>Northiam</td><td>9</td><td>61</td><td>0</td><td>72</td><td>142</td></tr> <tr><td>Broad Oak</td><td>2</td><td>19</td><td>0</td><td>50</td><td>71</td></tr> <tr><td>Peasmarsh</td><td>5</td><td>4</td><td>0</td><td>50</td><td>59</td></tr> <tr><td>Netherfield</td><td>7</td><td>0</td><td>0</td><td>48</td><td>55</td></tr> <tr><td>Catsfield</td><td>7</td><td>10</td><td>0</td><td>47</td><td>64</td></tr> <tr><td>Westfield</td><td>24</td><td>51</td><td>0</td><td>40</td><td>115</td></tr> <tr><td>Burwash</td><td>-7</td><td>22</td><td>0</td><td>35</td><td>50</td></tr> <tr><td>Sedlescombe</td><td>12</td><td>29</td><td>0</td><td>35</td><td>76</td></tr> <tr><td>Etchingham</td><td>1</td><td>22</td><td>0</td><td>30</td><td>53</td></tr> <tr><td>Staplecross</td><td>2</td><td>10</td><td>0</td><td>25</td><td>37</td></tr> <tr><td>Camber</td><td>47</td><td>32</td><td>0</td><td>20</td><td>99</td></tr> <tr><td>Fairlight Cove</td><td>2</td><td>5</td><td>17</td><td>20</td><td>44</td></tr> <tr><td>Beckley / Four Oaks</td><td>2</td><td>18</td><td>0</td><td>20</td><td>40</td></tr> <tr><td>Crowhurst</td><td>1</td><td>1</td><td>0</td><td>20</td><td>22</td></tr> <tr><td>Filmwell</td><td>0</td><td>1</td><td>26 (+2)</td><td>17</td><td>44</td></tr> <tr><td>Iden</td><td>2</td><td>4</td><td>0</td><td>12</td><td>18</td></tr> <tr><td>Three Oaks</td><td>0</td><td>8</td><td>0</td><td>0</td><td>8</td></tr> <tr><td>Winchelsea Beach</td><td>0</td><td>8</td><td>0</td><td>0</td><td>8</td></tr> <tr><td>Udimore</td><td>0</td><td>7</td><td>0</td><td>0</td><td>7</td></tr> <tr><td>Pett Level</td><td>1</td><td>4</td><td>0</td><td>0</td><td>5</td></tr> <tr><td>Pett</td><td>3</td><td>1</td><td>0</td><td>0</td><td>4</td></tr> <tr><td>Icklesham</td><td>1</td><td>3</td><td>0</td><td>0</td><td>4</td></tr> <tr><td>Brede</td><td>2</td><td>1</td><td>0</td><td>0</td><td>3</td></tr> <tr><td>Stonegate</td><td>0</td><td>2</td><td>0</td><td>0</td><td>2</td></tr> <tr><td>Woods Corner</td><td>0</td><td>2</td><td>0</td><td>0</td><td>2</td></tr> <tr><td>Cackle Street</td><td>0</td><td>2</td><td>0</td><td>0</td><td>2</td></tr> <tr><td>Mountfield</td><td>0</td><td>2</td><td>0</td><td>0</td><td>2</td></tr> <tr><td>Fairlight</td><td>0</td><td>2</td><td>0</td><td>0</td><td>2</td></tr> <tr><td>Whatlington</td><td>0</td><td>2</td><td>0</td><td>0</td><td>2</td></tr> <tr><td>Ashburnham</td><td>0</td><td>1</td><td>0</td><td>0</td><td>1</td></tr> <tr><td>Dallington</td><td>1</td><td>0</td><td>0</td><td>0</td><td>1</td></tr> <tr><td>Bodiam</td><td>0</td><td>1</td><td>0</td><td>0</td><td>1</td></tr> <tr><td>Guestling Green</td><td>0</td><td>1</td><td>0</td><td>0</td><td>1</td></tr> <tr><td>Brightling</td><td>0</td><td>1</td><td>0</td><td>0</td><td>1</td></tr> <tr><td>Ewhurst</td><td>0</td><td>1</td><td>0</td><td>0</td><td>1</td></tr> <tr><td>Burwash Common</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td></tr> <tr><td>Normans Bay</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td></tr> <tr><td>Burwash Weald</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td></tr> <tr><td>Friars Hill</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td></tr> <tr><td>Johns Cross</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td></tr> <tr><td>Winchelsea</td><td>0</td><td>0</td><td>0</td><td>0</td><td>0</td></tr> <tr><td>Rural Exception Sites Allowance</td><td></td><td></td><td></td><td></td><td>65</td></tr> <tr><td>Small Site Windfall Allowance in Years 5-15 (2018-2028)</td><td></td><td></td><td></td><td></td><td>242</td></tr> <tr><td>TOTAL</td><td>116</td><td>356</td><td>90</td><td>803</td><td>1,672</td></tr> </tbody> </table> <p data-bbox="988 1407 1884 1585"> 1. Bold Font indicates village had a defined development boundary in the 2006 Local Plan. 2. Includes permissions and applications delegated to approve subject to S106. Full Details of all commitments contained in Part 2 of the SHLAA (page 112) 3. Subject to review and re-assessment as part of SHLAA process. Numbers in brackets indicate any revisions as part of re-assessment. See SHLAA Part 2 for details. 4. Estimated from suitable and developable (green and amber) SHLAA sites. Core Strategy policy expectation that new allocations are within or immediately abutting a village development boundary. See SHLAA Part 2 for details. 5. Individual village number may be higher as a result of additional windfalls and rural exception sites. 6. Rural Exception sites (which by definition are both locally driven by the community, and on sites that would not normally be suitable for housing) are considered separately and in response to a locally specific need. The overall rural area target is derived from the Council's Housing Strategy. 9. Including 50 from 'Broad Location' at Peasmarsh. See SHLAA Part 2 for details. </p>	Settlement/Area <small>See Footnote 1</small>	All Net Completions in Plan Period <small>(01/04/2011 to 31/03/2013)</small>	Current Commitments <small>See Footnote 2</small>	Allocations (Remaining from 2006 Local Plan) <small>See Footnote 3</small>	Potential New Sites <small>See Footnotes 4 & 9</small>	Total New Housing 2011 - 2028 <small>See Footnote 5</small>	Robertsbridge	2	6	47 (+1)	100	155	Ticehurst	-10	6	0	87	83	Hurst Green	0	6	0	75	81	Northiam	9	61	0	72	142	Broad Oak	2	19	0	50	71	Peasmarsh	5	4	0	50	59	Netherfield	7	0	0	48	55	Catsfield	7	10	0	47	64	Westfield	24	51	0	40	115	Burwash	-7	22	0	35	50	Sedlescombe	12	29	0	35	76	Etchingham	1	22	0	30	53	Staplecross	2	10	0	25	37	Camber	47	32	0	20	99	Fairlight Cove	2	5	17	20	44	Beckley / Four Oaks	2	18	0	20	40	Crowhurst	1	1	0	20	22	Filmwell	0	1	26 (+2)	17	44	Iden	2	4	0	12	18	Three Oaks	0	8	0	0	8	Winchelsea Beach	0	8	0	0	8	Udimore	0	7	0	0	7	Pett Level	1	4	0	0	5	Pett	3	1	0	0	4	Icklesham	1	3	0	0	4	Brede	2	1	0	0	3	Stonegate	0	2	0	0	2	Woods Corner	0	2	0	0	2	Cackle Street	0	2	0	0	2	Mountfield	0	2	0	0	2	Fairlight	0	2	0	0	2	Whatlington	0	2	0	0	2	Ashburnham	0	1	0	0	1	Dallington	1	0	0	0	1	Bodiam	0	1	0	0	1	Guestling Green	0	1	0	0	1	Brightling	0	1	0	0	1	Ewhurst	0	1	0	0	1	Burwash Common	0	0	0	0	0	Normans Bay	0	0	0	0	0	Burwash Weald	0	0	0	0	0	Friars Hill	0	0	0	0	0	Johns Cross	0	0	0	0	0	Winchelsea	0	0	0	0	0	Rural Exception Sites Allowance					65	Small Site Windfall Allowance in Years 5-15 (2018-2028)					242	TOTAL	116	356	90	803	1,672
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54		MOD 12.6	p81	<p>Insert additional text after Figure 12, to read:</p> <p>[Insert] <u>Potential new sites</u> in Figure 12 refers to sites <u>expected to be formally allocated</u> via the Development and Site Allocations DPD or Neighbourhood Plans. These will normally comprise development sites accommodating 6 or more dwellings.</p> <p>Previously unidentified large sites (6 dwellings and over) in a village gaining planning permission before adoption of the relevant DPD/Plan may be deducted from the total '<u>Potential new sites</u>' that an individual village is expected to achieve, depending on the stage reached and the suitability of other potential sites.</p> <p>Developments of less than 6 dwellings, on currently unidentified sites, will count towards the overall rural housing numbers total as</p>																																																																																																																																																																																																																																																																																																

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				<p>'small-site windfalls'; an estimated allowance for them has been included for years 5-15. Therefore, to avoid double counting, they are in addition to the '<u>Potential new sites</u>' for individual villages.</p> <p>Affordable housing 'Exception sites' are typically between 6 and 14 dwellings. In common with small site windfalls, they are dealt with in a separate row on Figure 12. Hence, they cannot be deducted from the '<u>potential new sites</u>' totals for villages, since to do so would entail double counting. The estimated number of 65 dwellings on 'Exception sites' across the rural areas for the plan period is based upon figures derived from the Council's Housing Strategy.</p>
55	FA8		Chapter 12, pg. 84 New paragraph between 12.52 and 12.53	<p>Insert new paragraph to read: <u>More generally, development in the countryside must have regard to impacts on both landscape character and natural resource management. 'Natural resources' in this context includes biodiversity, water resources, water quality, floodplains, coastline, air quality and minerals.</u></p>
56	FA9		Chapter 12, pg. 86 Policy RA3	<p>Amend RA3 (iii) (a), to read: <u>(a) agricultural dwellings in accordance with PPS7 Annex A dwellings to support farming and other land-based industries. Normally, accommodation will initially be provided on a temporary basis for a period of three years. Both temporary and permanent dwellings will be subject to appropriate occupancy conditions, and all applications should comply with the following criteria:</u></p> <ol style="list-style-type: none"> <u>I. demonstrate a clearly established functional need, relating to a full-time worker primarily employed in the farming and other land-based businesses;</u> <u>II. demonstrate the functional need cannot be fulfilled by other existing accommodation in the area;</u> <u>III. demonstrate the unit and the agricultural activity concerned are financially sound and have a clear prospect of remaining so;</u> <u>IV. dwellings are of appropriate size, siting and design.</u> <p>Also, amend paragraph 12.57, to read: 12.57 To protect the undeveloped and rural landscape of the countryside, new residential development, as for other forms of development in the countryside, must be limited to that which cannot be located in an urban area, specifically in limited circumstances, as set out in <u>the National Planning Policy Framework, Annex A of PPS7: Sustainable Development in Rural Areas,</u> and which positively contributes to maintaining the landscape heritage and character of the area. <u>In particular, new dwellings may be essential for the proper functioning of land-based businesses (i.e. farming, forestry and equine-related activities). Such businesses should be demonstrably 'financially sound', which normally means that permissions will initially be on a temporary basis. Permanent dwellings will normally require the agricultural unit and activity to have been established for at least three years, have been profitable for at least one of them, be currently financially sound and have a clear prospect of remaining so. Careful consideration should also be given to the siting, size and design, as well as access. The siting of new dwellings should be well-related to existing farm buildings or other dwellings, wherever practicable. To ensure that a dwelling remains available to meet the recognised need, occupancy conditions will be applied.</u></p>
57	FA10		Chapter 12, pg. 86. Policy RA4 and paragraph 12.65	<p>Amend RA4(i) (c) to remove reference to affordable housing in the sequential approach, to read: <u>(c) Where such uses are not suitable, due to adverse impacts on amenity or rural landscape character, such buildings will be considered for residential conversion for affordable housing for those with a local housing need, including local key workers. Open market residential conversions will only be considered where no such local housing need is found, or where no Registered Provider is willing to take on the scheme or not achievable due to viability, then residential use may be considered acceptable.</u></p> <p>Also, amend the supporting text at paragraph 12.65 accordingly, as well as to highlight the viability test, and cross refer to the relevant housing policy, to read:</p> <p>12.65 Where such conversions are not suitable for the particular nature or location of the buildings, <u>or where the applicant has demonstrated that employment or tourism uses are not viable,</u> residential conversions will be considered. <u>In such circumstances, the applicant should demonstrate that every attempt has been made to secure an employment or tourism re-use first. Where such residential conversion involves the creation of a new dwelling(s), then the scheme will be required to contribute towards the provision of affordable housing in accordance with Policy LHN2.</u></p> <p><u>In order to help meet the local housing need, priority for residential conversions will be as affordable housing for people with a local connection by living or working in the area, which may include local key workers³⁰. This will operate in a similar way to the 'Exception Sites' policy in the Housing chapter, via liaison with the Council's Housing Division and the relevant Registered Providers. Where there is no household with a local connection in</u></p>

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				need of affordable housing, or where a scheme is otherwise not feasible, open market housing will be considered.
58	FA11		Chapter 12, pg. 88. New Paragraph after 12.68	Insert an additional paragraph after 12.68, to read: <u>Historic farm buildings can often also be important habitats for wildlife such as bats, barn owls and other nesting birds. The English Heritage document 'The Conversion of Traditional Historic Farm Buildings: A guide to good practice' also gives advice on wildlife legislation in this respect, and advises that an ecological survey should be carried out at project feasibility stage to establish whether there are protected species present.</u>
Chapter 13 – Sustainable Resource Management				
59	FA12		Chapter 13, pg. 95, Policy SRM1 and paragraph 13.15	Amend SRM1(i), to read: <u>(i) Require proposed developments of more than 400-10 dwellings or 1,000m² of non-residential floorspace to provide a comprehensive energy strategy and, for proposed developments of more than 100 dwellings or 50 apartments to require such a strategy to include an assessment of the potential for combined heat and power and district heating, including an assessment of the potential for solar, biomass and wind-generated energy, and of combined heat and power, and consider extending this requirement to smaller schemes, subject to further assessment of the thresholds via a subsequent DPD and/or SPD;</u> Also, insert a sentence at the beginning of 13.15 to read: <u>The Study recommends the development of energy strategies for developments over certain thresholds. It also recommends the scope of strategies, which should be based on the predicted energy demand as derived from building physics modelling.</u>
60	FA13		Chapter 13, pg. 95, Policy SRM1	Amend SRM1(iii) to read: <u>(iii) Support stand-alone renewable and low carbon energy generation schemes, particularly those utilising solar, biomass and wind energy technologies, that:</u> <u>a) do not have a significant adverse impact on local amenities, ecological and heritage assets or landscape character, particularly those utilising solar, biomass and wind energy technologies</u>
61	FA14		Chapter 13, pg. 95, Policy SRM1	Insert an additional part to SRM1, to read: <u>(viii) Expect new developments to provide and support recycling facilities;</u>
62	FA15		Chapter 13, pg. 95, Policy SRM1	Amend SRM1 (vi) to read: <u>(vi) Adaptation in accordance with the East Sussex LCLIP, including through building in resilience to anticipated climatic changes, including through green infrastructure;</u>
63	FA16		Chapter 13, pg. 98, Policy SRM2 and paragraph 13.28	Amend SRM2 (ii) to refer to the South East River Basin Management Plan, to read: <u>(ii) Ensuring that new development does not have an adverse effect on the water quality and potential yield of water resources, in line with the objectives of the South East River Basin Management Plan, including with particular reference to groundwater 'source protection zones;</u> Also, include reference to relevant Environment Agency guidance at the end of paragraph 13.28, to read: <u>Particular regard should be given to the Environment Agency's 'Groundwater Protection: Policy and Protection (GP3)' document.</u>
64	FA17		Chapter 13, pg. 98 Policy SRM2 and a supporting	Redraft criterion (v) to give greater emphasis to water efficiency, to read: <u>(v) The promotion of Ensuring that all development incorporates water efficiency through the use of rainwater and grey water storage and recycling measures appropriate to the scale and nature of the use proposed.</u> Also, insert a new paragraph after paragraph 13.29 to highlight water resource issues, the need for water efficiency, potential measures and how these will be defined; to read:

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65			paragraph	<u>Given the pressures on water resources, it is important to use water efficiently. Further consideration of specific water efficiency measures, including the use of water efficient appliances, rainwater and grey water storage and recycling, will be made through the Development and Site Allocations DPD.</u>
Chapter 15 – Local Housing Needs – Gypsies and Travellers				
66		MOD 15.1	p123	Amend paragraph 15.46 to read: 15.46 In terms of transit provision, a need has been identified for 8 pitches (potentially in 2 sites of 4 pitches) across East Sussex in order to create a network of sites across the County and the wider South East region in the vicinity of the A27/A259 corridor. Work will continue with Local Authorities across East Sussex to identify land in order to accommodate unmet demand for transit provision. <ins>The Council will continue to work with other Local Authorities across East Sussex to allocate land to meet the countywide transit needs, particularly through collaborative working.</ins>
67		MOD 15.2	p124	Amend paragraph 15.48 to read: 15.48 Sites will need to be deliverable, either through being (or proposed to be) publicly owned, owned by gypsies/travellers, have a willing landowner or, possibly, promoted by developers as part of a comprehensive scheme that addresses the full range of housing need. <ins>The Council will maintain an up-to-date 5-year supply of Gypsy and Travellers sites for the District through its Local Plan Monitoring Report.</ins>
Chapter 16 – Economy				
68		MOD 16.1	p129	Insert a new paragraph before Policy EC3: Existing Employment Sites to read: <ins>Existing employment sites can make a particularly valuable contribution to the supply of business land and premises because of the often marginal viability of new commercial developments. However, the National Planning Policy Framework and Planning Practice Guidance advise that land allocations should be regularly reviewed. A full review, taking into account the advice in Planning Practice Guidance, of economic development needs and use of existing business sites will be undertaken as part of the site allocations process.</ins> Delete the first sentence of Policy EC3 and replace with: Effective use of employment land and premises will be secured by undertaking a full review of existing and potential sites for employment use and allocating sites in the Development and Site Allocations Plan and/or Neighbourhood Plans. Until those plans are in place the following policy will apply:
69		MOD 16.2	p129	Delete part (iii) of Policy EC2 Business Land and Premises and replace text: Policy EC2: Business Land and Premises A suitably broad and readily available supply of business land and premises will be achieved by: (i) provision for some 100,000 sq m of employment floorspace over the Plan period, with the majority following on from construction of the Hastings Bexhill Link Road; (ii) increasing the supply of high quality employment sites, including new major business sites at Bexhill; (iii) improving the supply and range of small-medium sized sites and units, including incubation space, in the towns and

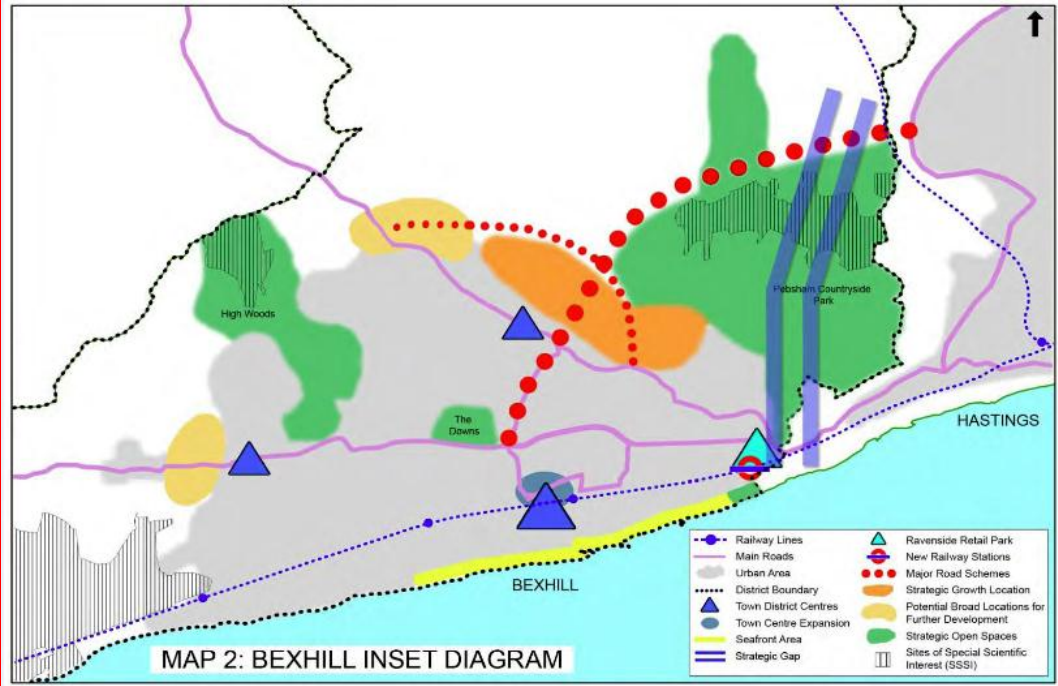
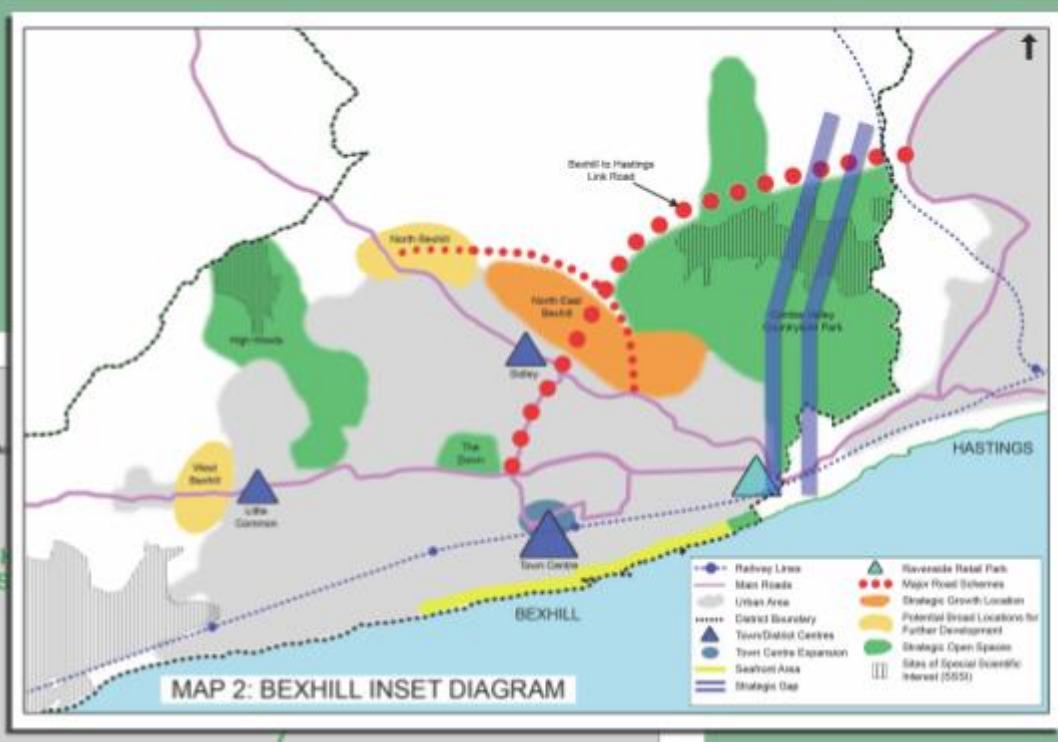
June 2014 Combined Modifications and Amendments Number	June 2012 Focused Amendment No	August 2013 Main Modification ID	Document (Page No.)	Proposed modification
				<p>villages which act as local service centres, particularly those that have good strategic accessibility (i.e. to the A21 road and rail corridor); [Insert] securing a range of incubation space, small and medium sized sites and units across the District in line with the respective spatial strategies, and particularly in settlements with good strategic access, including through mixed use developments;</p> <p>(iv) providing for business development in locations that make effective use of rail and water transport opportunities, notably at the Port of Rye;</p> <p>(v) seeking town centre, or edge of centre, sites for offices, including as part of mixed-use developments.</p>
70		MOD 16.3	p132	<p>Amend Policy EC6 (vii): Tourism Activities and Facilities to read:</p> <p>Policy EC6: Tourism Activities and Facilities</p> <p>Proposals relating to tourism activities and facilities will be encouraged where they accord with the following considerations, as appropriate:</p> <ul style="list-style-type: none"> (i) it provides for the enhancement of existing attractions or accommodation to meet customer expectations; (ii) it supports active use along the coast, consistent with environmental and amenity factors; (iii) it develops markets for local produce, particularly that which supports land-based industries and cultural assets; (iv) it does not involve the loss of tourism accommodation, unless there is no prospect of its continued use; (v) it increases the supply of quality serviced and self-catering accommodation; (vi) appropriate controls are in place that restrict occupancy to that for holiday purposes, whilst not unduly restricting operators from extending their season (subject to visual impact and flood risk considerations, where applicable); (vii) it is capable of access by public transport, cycleways and footpaths. [Insert] compatibility with other Core Strategy policies.
71		MOD 16.4		<p>Amend Policy EC7 (iv): Retail Development to read:</p> <p>Policy EC7: Retail Development</p> <p>The overall strategy for retail and related service uses in Rother district is to:</p> <ul style="list-style-type: none"> (i) Support the Town Centres of Bexhill, Battle and Rye in maintaining and increasing the proportion of retail spend available within their respective local catchments, consistent with the wider hierarchy of centres and their capacity for increasing and recovering trade in a sustainable manner; (ii) Plan for the amount of additional floorspace in each of the town centres, as set out in their respective town chapters; (iii) If there are no sites available (or will be available within a reasonable period of time) in town centres to meet identified retail needs, to firstly look at edge of centre locations and then out-of-centre locations, with priority to those with greatest accessibility in each category; (iv) Require development proposals likely to impact on a town centre to undertake an impact test; [Insert] Require retail development proposals in excess of 500sqm to undertake a retail impact assessment; (v) Actively promote Town Centres through appropriate interventions in close collaboration with town centre businesses and local communities.
Chapter 17 – Environment				
72	FA19		Chapter 17, pg. 146, Paragraph 17.41	<p>Redraft paragraph 17.41 to read:</p> <p>17.41 Rother's Appropriate Assessment examines whether the Core Strategy is likely to have any significant impacts on European designated conservation sites. This assessment cannot definitely say that there will be no significant effects on European Sites. It is recognised that there is a need to manage recreation and tourism activities so they do not harm the integrity of these sites. More generally, green infrastructure can be used to</p>

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				<p>avoid adverse impacts on biodiversity through buffering or provision of alternative sites for outdoor recreation. Whilst recognising the need for sensitive management of green infrastructure activities.</p> <p>17.41 Rother has a number of designated sites of international significance within the district and is required to undertake an Appropriate Assessment (AA) to ensure that plans or projects either individually or in combination will have no adverse effect on the integrity of the international sites. The AA process has identified a number of potential impacts which have been addressed in the Core Strategy. There is a requirement for the sensitive management of tourism and recreational activity upon the International sites. To preserve the integrity of the International sites the Council alongside other agencies and stakeholders, will implement a Sustainable Access Strategy to monitor visitor numbers arising from all sources, and ensure responsible management of the Dungeness complex. Further elaboration can be found in Paragraph 10.20.</p>
73		MOD 17.1	p149	<p>Add the following sentence to Paragraph 17.57:</p> <p>17.57 The policy for management of Rother's coastline has been developed in conjunction with other Local Authorities and the Environment Agency and set out in the South Foreland to Beachy Head Shoreline Management Plan and Folkestone to Cliff End Flood and Erosion Management Strategy. As a priority Rother District Council will work with the Environment Agency and stakeholders to enforce a 'hold the line' strategy along the district's coastline in accordance with the SMP and FEMS. Where tidal flooding is a significant risk to communities it is proposed to improve existing defences to the 1 in 200 year extreme event standard and this includes raising the eastern bank of the River Rother, Rye, improving defences at Broomhill Sands and constructing new timber groynes at Winchelsea Beach and Cliff End as well as placing shingle on the beach. An earth embankment has been built between Winchelsea Beach and Rye Harbour to form a secondary defence behind the shingle beach and has a design life of 50 years. [Insert] The Council acknowledges there are particular land stability and coastal erosion issues specific to Fairlight Cove and will engage with local stakeholders and statutory bodies to consider detail policies for Fairlight as part of Development Management and Site Allocations Plan, in line with Policy OSS4 (viii)'.</p>
74	FA20		Chapter 17, pg. 147, Policy EN5	<p>Amend Policy EN5 by the addition of a further criterion, inserted after (i): <u>Protect and enhance the international, national and locally designated sites, having due regard to their status;</u></p>
75	FA21		Chapter 17, pg. 147, Policy EN5	<p>Amend the first sentence of Policy EN5 and insert additional part, as follows: Biodiversity, <u>geodiversity</u> and green space will be protected and enhanced, by multi-agency working where appropriate, to:</p>
Chapter 18 – Transport				
76		MOD 18.1	p156	<p>Amend Policy TR1 (iv) to read:</p> <p>Policy TR1: Management and Investment in Strategic Accessibility</p> <p>Support will be given to the improvement of strategic infrastructure that will strengthen the role of Rother, and especially Bexhill, as an area of economic activity and investment opportunity. Priority will be to improve connectivity along key transport corridors; enable regeneration and reduce entrenched economic and social disparities. This will include:</p> <ul style="list-style-type: none"> i. Support for early implementation of the Bexhill to Hastings Link Road and associated bus and cycle improvements; ii. Working with agencies and stakeholders to deliver effective management of strategic transport corridors; iii. Investment into providing transport choice; and iv. Working with agencies to upgrade the capacity and capability of the East Coastway and Hastings to London rail corridors [Delete] (including investigating potential for a new station to the west of Hastings and Glyne Gap, Bexhill).
Chapter 19 – Implementation				

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77	FA22	MOD 19.1	Chapter 19 p166 Policy IM3	<p>Amend Policy IM3 to read:</p> <p>Policy IM3: Phasing of Development</p> <p>In allocating sites and considering planning applications, the Council will seek to provide for new development in a timely manner, insofar as it contributes to overall and local development strategies, and is or will be served by the infrastructure needed to support the development. In particular, it will:</p> <ul style="list-style-type: none"> (i) maintain a 5-year supply of available housing land [Insert] in compliance with the National Planning Policy Framework; (ii) consider phasing further housing land releases where it is important for the assimilation of development into a community; (iii) normally give priority to the release of employment land where infrastructure capacity is limited; (iv) seek agreement with developers, and infrastructure providers where appropriate, to ensure that any infrastructure improvements to support development are brought forward at the time they are needed and linked to the timing of development.
Appendices				
78		MOD A3.1	p190	<p>Replace Appendix 3 Housing: Component of Housing Supply with updated version:</p> <p> </p>

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				<p style="text-align: center;">Housing Requirements for Plan Period 2011 to 2028</p> <table border="1" data-bbox="991 352 1881 1310"> <thead> <tr> <th rowspan="2">Housing Requirements</th> <th colspan="6">Number of dwellings</th> </tr> <tr> <th>Bexhill*</th> <th>Hastings Fringes</th> <th>Battle</th> <th>Rye & Rye Harbour</th> <th>Villages</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Total Housing Requirement 2011-2028</td> <td>2,050-2,250¹</td> <td>45-80</td> <td>400-440</td> <td>250-350</td> <td>950-1,000</td> <td>3,700 -4,100</td> </tr> <tr> <td>Total outstanding permissions</td> <td>311</td> <td>44</td> <td>289</td> <td>169</td> <td>364</td> <td>1,177</td> </tr> <tr> <td>Current allocations (including reserve sites)</td> <td>1,411</td> <td>0</td> <td>14</td> <td>170</td> <td>160</td> <td>1,755</td> </tr> <tr> <td>Total commitments (permissions and allocations)</td> <td>1,722</td> <td>44</td> <td>303</td> <td>339²</td> <td>524</td> <td>2,932</td> </tr> <tr> <td>Estimated small site windfalls in years 10-15³</td> <td>75</td> <td>1</td> <td>15</td> <td>16</td> <td>118</td> <td>225</td> </tr> <tr> <td>Total permissions, allocations and windfalls</td> <td>1,797</td> <td>45</td> <td>318</td> <td>16</td> <td>642</td> <td>3,157</td> </tr> <tr> <td>Total allocations required (existing and new)</td> <td>1,664-1,864</td> <td>0-35</td> <td>96-136</td> <td>170</td> <td>468-518</td> <td>2413-2798</td> </tr> <tr> <td>Further allocations required - actual</td> <td>253-453</td> <td>0-35</td> <td>82-122</td> <td>0²</td> <td>308-358</td> <td>543-943</td> </tr> <tr> <td>Further allocations required - rounded</td> <td>250-450</td> <td>0-35</td> <td>100</td> <td>0</td> <td>310-360</td> <td>550-950</td> </tr> <tr> <td>Total 2006-2026 implied by mid-point</td> <td>2578</td> <td>56</td> <td>452</td> <td>355</td> <td>1317</td> <td>4,758</td> </tr> <tr> <td>Total 2011-2028 - required by mid-point</td> <td>2,150</td> <td>63</td> <td>420</td> <td>300</td> <td>975</td> <td>3,908</td> </tr> </tbody> </table> <p data-bbox="991 1331 1881 1436"> ¹ Delivery at Bexhill is heavily dependent upon confirmation of funding of the Link Road. ² There is a degree of uncertainty regarding delivery of existing commitments at Rye, which accounts in part for lack of additional allocations. ³ Based on rate of small site windfalls at 50% of rate over period 2000-2010. </p> <p data-bbox="982 1583 1080 1619">[Insert]</p> <p style="text-align: center;">Housing Requirements for Plan Period 2011 to 2028</p> <table border="1" data-bbox="982 1688 1991 2003"> <thead> <tr> <th rowspan="2">Housing Requirements</th> <th colspan="6">Number of dwellings</th> </tr> <tr> <th>Bexhill</th> <th>Hastings Fringes</th> <th>Battle</th> <th>Rye & Rye Harbour</th> <th>Villages</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Total housing requirement 2011-2028</td> <td>3,100</td> <td>100-250</td> <td>475-500</td> <td>355-400</td> <td>1,670</td> <td>at least 5,700</td> </tr> </tbody> </table>	Housing Requirements	Number of dwellings						Bexhill*	Hastings Fringes	Battle	Rye & Rye Harbour	Villages	Total	Total Housing Requirement 2011-2028	2,050-2,250 ¹	45-80	400-440	250-350	950-1,000	3,700 -4,100	Total outstanding permissions	311	44	289	169	364	1,177	Current allocations (including reserve sites)	1,411	0	14	170	160	1,755	Total commitments (permissions and allocations)	1,722	44	303	339 ²	524	2,932	Estimated small site windfalls in years 10-15 ³	75	1	15	16	118	225	Total permissions, allocations and windfalls	1,797	45	318	16	642	3,157	Total allocations required (existing and new)	1,664-1,864	0-35	96-136	170	468-518	2413-2798	Further allocations required - actual	253-453	0-35	82-122	0 ²	308-358	543-943	Further allocations required - rounded	250-450	0-35	100	0	310-360	550-950	Total 2006-2026 implied by mid-point	2578	56	452	355	1317	4,758	Total 2011-2028 - required by mid-point	2,150	63	420	300	975	3,908	Housing Requirements	Number of dwellings						Bexhill	Hastings Fringes	Battle	Rye & Rye Harbour	Villages	Total	Total housing requirement 2011-2028	3,100	100-250	475-500	355-400	1,670	at least 5,700
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				Completions (1/4/2011 – 31/03/2013)	64	1	11	83	116	275	
				Total Outstanding Permissions	337	43	275	119	356	1,130	
				Current allocations	1,450	0	14	53	90	1,607	
				Total Completions, Commitments and Allocations	1,851	44	300	255	562	3,012	
				Estimated small site windfalls in years 5-15 ¹	153	2	30	33	242	460	
				Rural Exception Sites Allowance	0	0	0	0	65	65	
				Total permissions, allocations and windfalls	2,004	46	330	288	869	3,537	
				Total allocations required (existing and new)	2,546	54-204	159-188	120-165	891	3770-3994	
				Further allocations required - actual	1,096	54-204	145-170	67-112	801	2,163-2,383	
¹ Based on rate of small site windfalls at 50% of rate over period 2000-2010.											
Map of Key Diagram											
79		MOD KD1	p214	Amend Map of Key Diagram to exclude New Railway Station at Glyne Gap							
[Delete]											

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				 <p>MAP 2: BEXHILL INSET DIAGRAM</p> <p>This map shows the urban area of Bexhill and its connection to Hastings. Key features include: <ul style="list-style-type: none"> Urban Area: Shaded in light grey. Strategic Growth Locations: Indicated by orange and red dotted areas. Strategic Open Spaces: Shaded in green, including High Woods and The Downs. Infrastructure: Railway lines (dashed purple), main roads (solid purple), and major road schemes (red dotted lines). Other Features: Town district centres (blue triangles), town centre expansion (blue circles), and seafront areas (yellow). Legend: <ul style="list-style-type: none"> Railway Lines Main Roads Urban Area District Boundary Town District Centres Town Centre Expansion Seafront Area Strategic Gap Ravenside Retail Park New Railway Stations Major Road Schemes Strategic Growth Location Potential Broad Locations for Further Development Strategic Open Spaces Sites of Special Scientific Interest (SSSI) </p>
				<p>[Insert]</p>  <p>MAP 2: BEXHILL INSET DIAGRAM</p> <p>This map is identical to the one above but includes additional labels for specific areas and infrastructure: <ul style="list-style-type: none"> North Beach and North East Beach are labeled in yellow. Bexhill to Hastings Link Road is labeled with a red dotted line. West Beach and Little Common are also labeled. Green Ganges is labeled near the seafront. </p>