

Peasmarsh Neighbourhood Development Plan 2021 to 2039



Courtesy of John Fielding Aerial Images

Regulation 15 Submission Version

February 2023

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For the purposes of this Plan :

An Appendix is included at the end of the Plan because it is too large, wieldy or detailed for the body of the Plan but needs to be easily referenced for clarity.

An Addendum is a standalone document which supports the main document but can be read in its own right.

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D2	Site Options and Assessment	AECOM I & E UK Ltd	2022
D3	Peasmarsh Site Assessments	PNDP Volunteer Group	2022
D4	Strategic Environmental Scoping Report	AECOM I & E UK Ltd	2022
D5	Strategic Environmental Assessment	AECOM I & E UK Ltd	2022
D6	Peasmarsh Villagescape and Design Codes	PNDP Group	2022

The links above were correct at February 2023.



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List of Acronyms

ALC	Agricultural Land Classification framework
ANA	Archaeological Notification Area
AONB	Area of Outstanding Natural Beauty
BAP	Biodiversity Action Plan
BOA	Biodiversity Opportunity Area
CQC	Care Quality Commission
DaSA	Development and Site Allocations <i>[part of the Local Plan]</i>
EDGH	Eastbourne District General Hospital
ESCC	East Sussex County Council
ESHT	East Sussex Hospital Trust
HNA	Housing Need Assessment
HWLT	High Weald Landscape Trail
HWMP	High Weald Management Plan
LPA	Local Planning Authority
NDP	Neighbourhood Development Plan
NA	Neighbourhood Area
NPPF	National Planning Policy Framework <i>[July 2021 version]</i>
OFCOM	Office of Communications
OFGEM	Office of Gas and Electricity Markets
OFSTED	Office for Standards in Education, Children's Services and Skills
ONS	Office for National Statistics
PAN	Published Admission Number <i>[for the primary school]</i>
PPG	Planning Practice Guidance
PNDP	Peasmarsh Neighbourhood Development Plan [the Plan]
PRoW	Public Right of Way
PSA	Peasmarsh Site Assessments
RDC	Rother District Council [Rother]
SE Water	South East Water <i>[a water supplier]</i>
SOA	Site Options and Assessment
SSSI	Site of Special Scientific Interest
SW	Southern Water <i>[a foul water processor]</i>
UKPN	UK Power Networks <i>[an electricity distributor]</i>
WPS	wastewater pumping station
WTW	wastewater treatment works



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Foreword

This Plan is an opportunity for the residents of Peasmarsh, those who work here and those who run businesses here to look forward and shape the way that the parish will develop in terms of housing needs, schooling, transport and community cohesion. The Plan is an expression of how community wants both the built and surrounding area to be enhanced and conserved as new development occurs.

However, this does not mean that in the future everything that happens in Peasmarsh will be exactly what the community wants as planning is continually changing and evolving to meet the needs and demands of the whole of society.

The Plan serves as a road map and vision of the community's desire to influence the changes and challenges that the future will inevitably bring and how these can be accommodated. It has been prepared following extensive public consultation and feedback to ensure that residents and other stakeholders have been consulted widely and that the Plan truly meets the community's needs and aspirations whilst also seeking to deliver on the expressed priorities of all and provide a sound base for planning applications in the coming years.

In conclusion I would like to thank the PNDP group and all of the other people who have helped them, for their hard work in developing this Plan.

David Pankhurst

Chairman Peasmarsh Parish Council



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1 Introduction

1.1 Context

Neighbourhood Development Plans [NDP's] were introduced in the 2011 Localism Act with the overall aim of devolving more decision-making powers from central government back into the hands of individuals, communities and councils. Specifically :

“Instead of local people being told what to do, the Government thinks that local communities should have genuine opportunities to influence the future of the places where they live. The Act introduces a new right for communities to draw up a neighbourhood plan.”

As distinct from early types of plans prepared by the parish, such as the 2006 Parish Action Plan, modern NDP's become part of the National Development Plan alongside the local authority's Local Plan and must be used in law by the local authority to determine planning applications in the neighbourhood.

The other key piece of the government's approach to localism is the National Planning Policy Framework [NPPF]. The current NPPF must be taken into account in preparing all development plans – including NDP's – and is a material consideration in planning decisions. The current edition of the NPPF is dated July 2021.

An NDP is therefore a powerful tool that gives a community statutory power to shape future development, integrating local knowledge and aspiration with planning policy to ensure that the community gets the development it needs in an appropriate location or locations.

1.2 The Peasmarsh Plan

Peasmarsh is the name of both a parish and the only village within the parish. It is within the area of Rother District Council [RDC], the relevant Local Planning Authority [LPA]. For the purposes of this Plan, the neighbourhood has been designated as the full extent of the parish as shown in Figure 1.1 [over]. RDC's designation was made on March 25 2021¹.

One of the key aspects of the parish is that it is entirely within the High Weald Area of Outstanding Beauty [AONB]. This has an important influence on the Plan.

The stakeholders in the Plan are primarily those who reside or work in the designated area plus the businesses that operate within it.

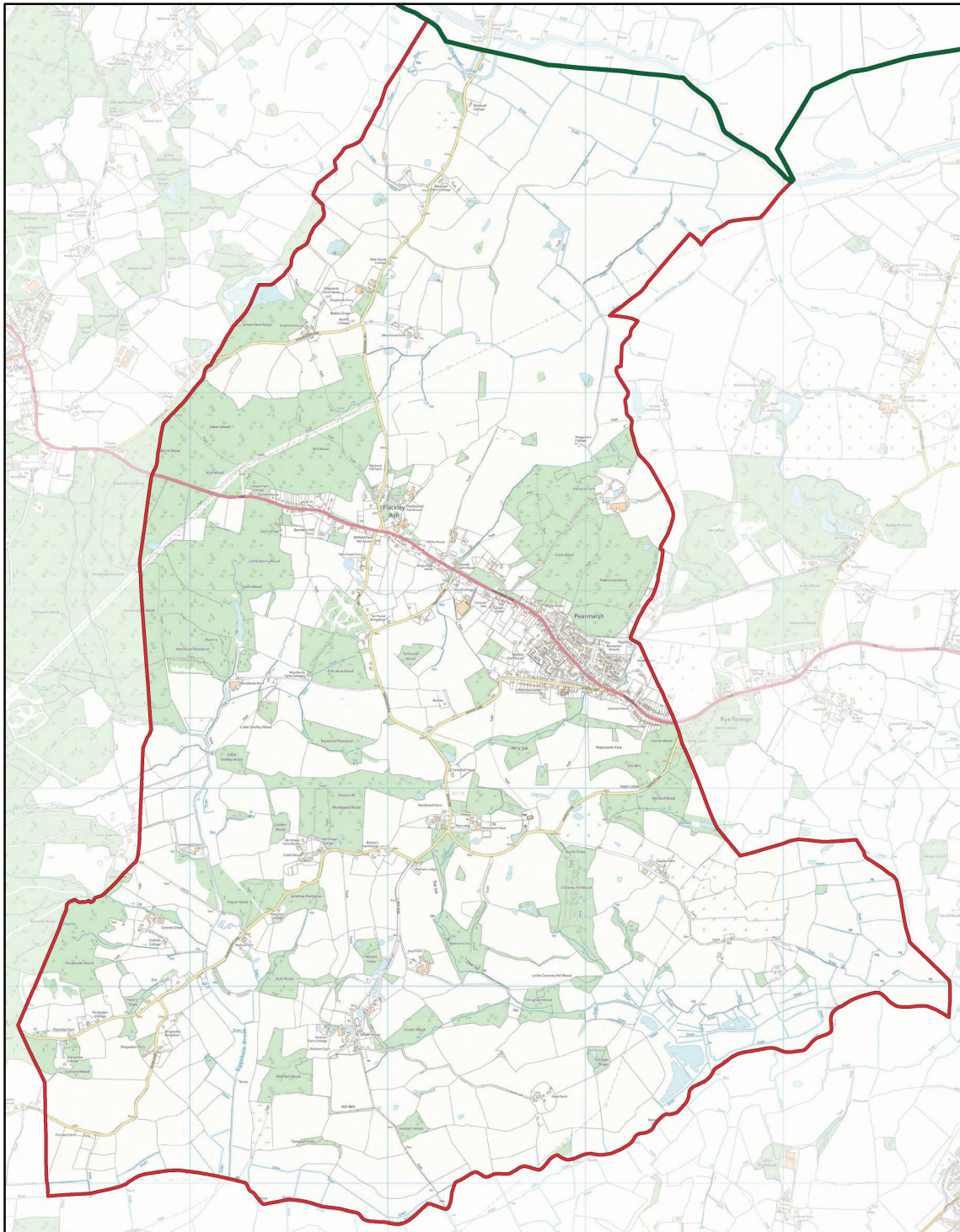
The current RDC Local Plan is for the period spanning from 2011 to 2028 but the authority is already working on an emerging plan which will run from 2019 to 2039. Work started on the Peasmarsh Neighbourhood Development Plan [PNDP or 'the Plan'] in early 2021 and, as NDP's cannot be backdated, its plan period is from 2021 to 2039 to align with the emerging RDC Local Plan.

The Peasmarsh Plan responds to the national challenge of increased demand for housing, jobs and transport and the local challenges set out in the Plan. It does this having full cognisance of the need for all development to be sustainable.

The proposals in this Plan, including the chosen site allocations, best reflect the public interest balancing all relevant considerations. Any development outside the parameters of the Plan is unlikely to be in the public interest.

¹ <https://www.peasmarshndp.uk/vault15/designation.pdf>

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Source : Rother DC

Figure 1.1 : Map of Neighbourhood Area Designated March 25 2021



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Early consultation² with the stakeholders showed that the following were wanted in the proposed plan :

- Protect the High Weald Area of Outstanding Beauty;
- Preserve the landscape, views and biodiversity of the parish;
- Maintain the tranquillity and dark skies of the parish;
- Maintain the rural character of the village;
- Provide truly affordable housing for families with local connections;
- Provide opportunities to downsize and remain in the parish;
- Avoid larger scale developments;
- Support and promote community facilities;
- Improve infrastructure, particularly public transport, sewage treatment and electricity supply;
- Improve road safety with changes to junctions, crossroads and speed limits;
- Work to improve the secondary education provision;

1.3 Vision and Objectives

Following the public consultations², a vision for the Peasmarch Plan was developed and published in November 2021. It was subsequently modified and adopted in July 2022 and updated again in January 2023 following further consultations with the stakeholders :

Vision

Peasmarch parish will continue developing its thriving, safe, healthy and friendly rural community through small-scale sustainable development.

The Plan will reflect the needs of and enhance the significant environmental assets of the parish whilst developing its economic viability and maintaining and improving health and wellbeing within its rural surrounding. It will also respect our location in the High Weald Area of Outstanding Natural Beauty.

A set of seven objectives, stemming from the vision, was also developed, following the same consultation process as the vision.

The overall objective of the PNDP is to reflect the wishes of the community in promoting the social, economic and environmental well-being of what is, essentially, a rural parish wholly within the High Weald AONB.

² Details of the consultation process are provided in the Consultation Statement that accompanies this document.



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The detailed objectives are as follows :

- 1 Sustain a thriving parish offering a range of facilities to the local community, businesses and visitors by supporting the creation and retention of small scale business, encouraging the provision of services / infrastructure and supporting the traditional farming community;
- 2 Seek adequate education provision for parish children of all ages, extending the local educational facilities in line with future housing developments
- 3 Protect and enhance local open spaces and access to the countryside to enhance the physical and mental wellbeing of residents and promoting cycle networks and non-vehicular connectivity with adjacent villages and town for a sustainable life in keeping with the AONB designation;
- 4 Ensure that future developments reflect both current and future housing needs of the parish in small clusters, promoting principles of sustainability, good design and quality that encourage the local context and exceed current energy efficiency standards;
- 5 Ensure that the parish infrastructure is improved to match existing requirements and then expanded in line with future housing developments; in the short term :
 - i) ensure that problems with surface water flooding and supercharging of the sewage system, both of which occur regularly, are substantially reduced or – preferably – eliminated;
 - ii) reduce the impact of road traffic and parking on the local community;
 - iii) ensure that the frequent and sometimes extended power failures are substantially reduced or – preferably – eliminated;
 - iv) support the national Bus Back Better policy to establish frequent bus services with markedly improved frequency all week and timetables integrated with other services including rail, all aspects which contribute to sustainability;
- 6 Improve social cohesion and reduce social isolation by securing the long term future of existing community leisure and cultural facilities for all ages and promote the provision of new facilities to address the future needs of the parish;
- 7 Protect, maintain and enhance the nationally and locally important heritage and environmental assets and historic character by guiding development sympathetic to the AONB designation;

1.4 Basic Conditions

As with all neighbourhood plans, this Plan complies with five basic conditions :

- i) it aligns with national policies and the advice and guidance provided in the NPPF;
- ii) it contributes to the achievement of sustainable development;
- iii) it is in general conformity with the strategic policies of the RDC Core Strategy;
- iv) it meets the relevant retained EU obligations; and
- v) it meets the requirements for conservation and environmental impact;



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The requirements of the NPPF have already been set out in Section 1.1 and the approach to, and policy for, sustainable development is discussed in Section 8. The PNDP volunteer group has liaised with Rother throughout the creation of the Plan to ensure that it conforms to [or is in agreement with] the 2014 Core Strategy.

Most of the relevant EU regulations still enshrined in English law relate to environmental impact, i.e. condition v), which is discussed in the next paragraph. Three other such directives relate to waste, air quality and water, all of which are conformed with.

The environment is, in any case, a key concern – particularly as the parish is a rural one and entirely within the High Weald AONB. The preparation of this Plan has been guided by a set of criteria created by external professional consultants as part of a Strategic Environmental Assessment. The consultants have subsequently assessed the Plan against those criteria. The report is provided in Addendum D5.

Another environmental requirement is set by the 2017 Conservation of Habitats and Species Regulations which require a Habitats Regulations Assessment [HRA] of the risk to any Special Area of Conservation [SAC] or any Special Protection Area [SPA]. RDC's screening opinion is that its 2018 HRA is still relevant. This is discussed in Section 3.2.

More details of the compliance with the basic conditions can be found in the Basic Conditions Statement that accompanies this Plan.

1.5 Structure of the Plan

The PNDP consists of 10 sections in total, of which this is the first. The remaining sections are as follows :

- 2 Peasmarsh : an Historic Rural Parish** introduces the parish to those that don't already know it well;
- 3 Landscape, the Environment and Heritage** discusses the situation with respect to those aspects of the parish – including sustainable transport – and establishes seven policies to protect and enhance them;
- 4 Infrastructure** discusses the issues with respect to both physical and community or social infrastructure and establishes seven policies to reach a situation where it would be possible to develop further housing in the parish;
- 5 Business and the Local Economy** discusses the situation with respect to those aspects of the parish and establishes four policies to protect and enhance them in an appropriate manner;
- 6 Housing** rehearses the need for housing in the parish and establishes three policies to ensure that any development is appropriate;
- 7 Site Allocation** reviews the possible development sites put forward and identifies those that can be developed, establishing three policies to ensure that any development is appropriate;
- 8 Design and the Built Environment**, supported by a Villagescape and Design Codes document, sets out how developments must be designed in order to be compatible with the parish environment, establishing five policies to enforce that;
- 9 Implementation and Monitoring** discusses how the Plan is to be implemented and managed once made;
- 10 Community Aspirations** covers issues not appropriate to the Plan proper;



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The Plan is supported by a set of appendices that are included at the end of the Plan document because they are too large, wieldy or detailed for the body of the Plan but need to be easily referenced for clarity and a set of addenda which are standalone documents which can be read in their own right.

Beyond the Plan there are two further documents : a Basic Conditions Statement and a Consultation Statement. The former sets out how the PNDP complies with the requirements of the 1990 Town and Country Planning Act. The latter describes the process of plan preparation and how and when all interested parties were consulted. That document will have to be updated as the process continues until the Plan is finally made.

2 Peasmarsh : an Historic Rural Parish

2.1 Introduction

The parish of Peasmarsh, East Sussex, lies in the north eastern quarter of Rother district. It stretches south from the Kent border along the banks of the River Rother, over a central ridge and down to the banks of the River Tillingham. The parish is approximately 5,5 km [3.5 miles] from north to south and 2.5 km [1.5 miles] east to west. The one village – also Peasmarsh – is about 6.5 km [4 miles] from the town of Rye.

It is an atypical parish in several ways :

- the core of the village is tucked hard up against the eastern boundary of the parish on the north side of the ridge;
- it is cut in two by the A268, the busy road that runs from the A21 through the middle of the village to Rye and Camber;
- the village has some of the characteristics of a ribbon development stretching beyond its core along the A268;
- the parish church is not in the village but up on the ridge in the presumed location of the pre-plague village;
- although the parish has a small population – about 1200 in 2011 – it has a large supermarket [with fuel station, post office, pharmacy and ATM] on the outskirts of the village that attracts customers from all over the district and beyond; the other shops in the village have all closed;

Despite the supermarket, the essential character of the village – which lies entirely within the High Weald AONB – is that of a rural village.

2.2 Environment

Because of its geography the parish has a variety of ecosystems which range from the flood plain of the Rother to the ridge south of the village.

Almost one third of the parish land area of 1,580 ha [3,900 acres] is designated priority habitat, mainly deciduous woodland [20.7%] and grazing marsh [7.4%]. Several of the woods are designated as Ancient Woodlands or Plantations on Ancient Woodland Sites. That includes Malthouse Wood and Cock Wood immediately north of Peasmarsh Village, essentially blocking any expansion of the central village in that direction.



Rural Peasmarsh

Although there are no Sites of Special Scientific Interest [SSSI's] within the parish, there are several in proximity and one – Leasam Wood Heronry – is less than 1km [0.6 miles] from the boundary. Accordingly, most of the parish is within one or other SSSI Impact Risk Zones.

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Similarly, the parish is not within a Wetland of International Importance [known as a 'Ramsar' site] but it is only 1.6km [1 mile] from the internationally recognised Dungeness, Romney Marsh and Rye Bay Ramsar site at its closest point.

Geologically, Peasmarsh is at the lower end of the Wealden formation where the sandstone runs out and the underlying clay is exposed. [Up until the late 19th century Peasmarsh had its own brickworks in the village using the local clay.] Because the sandstone is permeable but the clay is not, there are many springs along the line between the two layers.

The issue is that the clay results in much of the parish being a critical drainage area. The potential for surface water flooding is further exacerbated by the effects of climate change which seem to be trending to downpour rain events.

2.3 Heritage

The origins of Peasmarsh [variously 'Pesemersse' and Pesemerssheare] are lost in the mists of time. Traces of a Roman bloomery have been reported on the central ridge of the parish and the parish church is recorded as having been built in about 1070 on the site of a, presumably wooden, Anglo-Saxon minster.



Parish Church of St Peter and St Paul

The parish does not appear in Domesday but that is said to be because it was already part of King William's holdings when he was Duke of Normandy. By the time of Pope Nicholas' 'Taxatio' survey, undertaken in 1291 and 92 during the reign of Edward I, Peasmarsh was the dominant local parish with the parishes of Beckley, Northiam, Iden and Playden all paying 'pensions' to Peasmarsh.

The parish church is on the central ridge but the modern village lies about 750m [0.5 miles] north at the bottom of the hill.

The most popular theory for this move – on the basis that the original village was around the church – is that it occurred during plague times when those who survived wanted to be well away from where the infections had started.

There are 55 listed buildings in Peasmarsh parish, including the Grade I listed 11th century parish church and, two Grade II* buildings. The oldest houses date from the 15th or 16th centuries.

East Sussex County Council [ESCC] has designated much of Peasmarsh village as an Archaeological Notification Area [ANA] in recognition of its special heritage status. The designation runs on either side of the A268 for nearly 2km [1.2 miles] plus at the lower end of School Lane.



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2.4 Transport

Peasmarsh is not well served by public transport and there are no cycleways so the population is very reliant on cars for moving around. In any case, being a rural community means that those not living in the village itself need to use cars in order to get to whatever public transport services are available.

The results of the initial public survey undertaken for PNDP showed that, overall, stakeholders rated the public transport services as only 39% adequate.

Bus

The village has one bus service [which runs from Rye to the village of Northiam through Peasmarsh along the A268 and back again]. However, there are only 7 buses per weekday from Rye and 6 per day to Rye, Rye being the more important destination. The first bus to Rye is at nearly 07:30 and there is no service after 16:30, sometimes with 2 hour gaps between buses. [The first bus from Rye only arrives at nearly 09:00 and the last at only 19:14.] There is a reduced service on Saturdays and none at all on Sundays or Bank Holidays.

However, buses from Peasmarsh are timed to arrive at the station either too close to the [punctual] train departures to allow purchase of tickets or just after the service has left. Even when there should be interconnection, the bus service is frequently late.

Rail

Rye railway station is 6 km [3.8 miles] by road from the junction of the A268 and School Lane [reducing to 5.6 km [3.5 miles] if a short-cut is taken via a narrow, potholed lane]. The line runs from Ashford to Hastings and onwards to the west. There is an hourly service in either direction with each route taking about 20 minutes to reach the mainline station. Depending on the time of day and direction of travel, interconnection times are sometimes good but not good at all at other times as discussed in Appendix A3.

The road route to the station is dangerous for active travel and the footpath route is only suited for pedestrians with hiking boots – and is longer than the road route across hilly terrain.

Road

The A268 is the route for traffic from London to Rye and Camber. Whilst Rye is a destination throughout the year, Camber is a seasonal destination. The traffic ranges from HGV's heading to distribution depots in Rye to motorcycles. There is also a considerable amount of traffic that delivers to the large supermarket as well as the shoppers visiting from the region.

The parish has a Black Cat traffic flow monitoring device so has recorded a considerable amount of traffic data. For example, in the seven day period April 18th to 24th 2022, the total volume of traffic travelling on the A268 in both directions was 40,241 at the recording point in the middle of the village. 69% of the vehicles exceeded the 30 mph speed limit and the 85th percentile of speed westward was 35.9 mph. The total number of vehicles above 45mph [for both directions combined] during the period was 382.



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2.5 Infrastructure

Some aspects of the infrastructure required to support parish life are decidedly below the standards expected. The results of the initial public survey rank those by priority for improvement as perceived by the stakeholders :

- 1st drainage [both foul and surface water]
- 2nd roads and traffic
- 3rd electricity supply
- 4th telecommunications

Gas is expected to be phased out during the plan period with little prospect that the network will be upgraded in the near or foreseeable future. Therefore it has not been included.

Foul Water Drainage

Peasmarsh does not have a foul water [sewage] treatment works and not even all of the village is connected to the system that does exist.

Approximately two thirds of the 592 homes in the parish are connected to the foul water system which leads to a pumping station on the site of the original treatment works. From there the foul water is pumped 3km [1.8 miles] to the treatment works in a neighbouring parish.

Southern Water, the responsible authority, stated that the system a 'foul only' system even though a considerable number of the properties have a mixed [foul and surface water] system discharging to the sewer. This is particularly an issue when a rain downpour event occurs : as discussed in Section 4.3.4, the pumping station recorded overflow spills to the local stream 38 times for a total of 193 hours during 2021 alone.

One of the issues, which the company does acknowledge, is that there is a low point in the sewer as it passes under the A268. Solids accumulate in that section which leads to local sewage spills and, consequently, has to be routinely flushed at intervals.

Surface Water Drainage

This issue has already been touched on when discussing the environment.

There are various points in Peasmarsh parish where heavy flooding occurs at regular intervals. The issue seems to be that existing culverts are either damaged or inadequate for the amount of surface water to be handled.

Electricity

The parish – sometimes just parts of it – experiences frequent supply disruption ranging from less than a second to hours or even days. This is because the supplies are, in general, spurs from high voltage lines and not rings [which would provide secure supplies]. There is little likelihood of the network being upgraded.

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Telecommunications

The broadband service in Peasmarsh village was upgraded about 5 years ago to deliver fibre to the cabinet so that only the final line to a property is copper. This means that householders are able to have 70 Mb/s download service if they wish to pay for it. The problem is that the way that the network has been implemented means that some properties do not get good service at peak periods due to bandwidth issues.

The broadband service in the rest of the parish relies entirely on copper and is, accordingly, poor to very poor.

The cell phone coverage has been improved in the last five years, at least outdoors : OFCOM reports that all four networks have 'OK Coverage' outdoors throughout the parish other than a few isolated places with 'Some Problems' rating. That does not necessarily tally with residents' experiences.

Indoor coverage is much poorer with only a 'good' or 'OK' service in the village itself and even that depends on which network is being used. Service away from the village varies from 'Some Problems' to 'No Coverage' and again depends on which network is being used.

An important issue is the power supply to the local cell towers which, as with domestic supply, experiences frequent disruption. The cells do not seem to have generators so any lengthy disruption exhausts the batteries in the uninterruptible power supplies and the cells close down.

2.6 Facilities

The nature of the facilities in Peasmarsh has changed substantially over the last 20 years as all of the shops and other outlets along the village's Main Street have closed. Instead the Jempson's campus at the west end of the village has taken over many of the roles previously served by separate companies. It has a regional supermarket, a fuel station, a post office, a pharmacy, a cafeteria and an ATM. It does not open on Sundays.

In some ways, having such a campus is good for the village but, because people from quite some distance come to Jempson's and because of the number of deliveries, there is a considerable strain on the road system, particularly the junction of Tanhouse Lane with the A268.

Other facilities, all in Peasmarsh village, include the Memorial Hall, the primary school [see section 2.9 below] and the recreation ground which has its own substantial pavilion.

The parish also boasts two public houses, both in the village, and two hotels, one on the fringes of the village and the other in a totally rural setting.



Peasmarsh Memorial Hall



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However, there are many facilities which the parish does not have : library [a mobile library used to visit], secondary school [see section 2.9 below], doctor or dentist [see section 2.10 below], bank [not even in Rye : the nearest bank is in Tenterden, about 13 km [8 miles] away], railway station or adequate bus service [see section 2.4 above], adequate communication systems away from the village [see section 2.5 above] and services for youth.

2.7 The Local Economy

Throughout most of the 19th Century almost 70% of the people living in Peasmarsh worked directly in agriculture with another 22% in occupations [retail, service and manufacturing] that supported this. The remaining 8% were classed as professional or capitalist. Peasmarsh was virtually self-sufficient as a village with a wide range of shops, its own nurse, policeman, postmaster and lawyer, workers in the building trade and, of course a licensed victualler or two. Residents in the village today remember the forge, butchers, baker, Spar shop, Post Office, garage / repair shop etc..

The economy of Peasmarsh today is primarily driven by some agriculture with tourism and retail [because the Jempson's campus serves a wide region, not just the parish] featuring strongly. There are, however, many small – typically self-employed people operating from home – businesses too.

Stakeholders, in general, view the parish as a dormitory location rather than an economic centre and wish it to stay that way.

In the village there is a facility called 'Malthouse Rural Business Park' owned by RDC which is a group of six very small [45 sq. m or 485 sq. ft each] light industrial units with electricity, water and a WC. However they seem to be used as storage bases for small businesses rather than as production units. There are no known people working there.

In general, agriculture, tourism and retail do not pay high wages. This is reflected in the government indices of deprivation, last published in 2019, which show that the parish [combined with part of Rye Foreign as area 'Rother' 002D] was in the 5th decile [40 to 50% so poorer than average] of the Index of Multiple Deprivation and in the same decile for income and employment indices.

2.8 Population and Housing

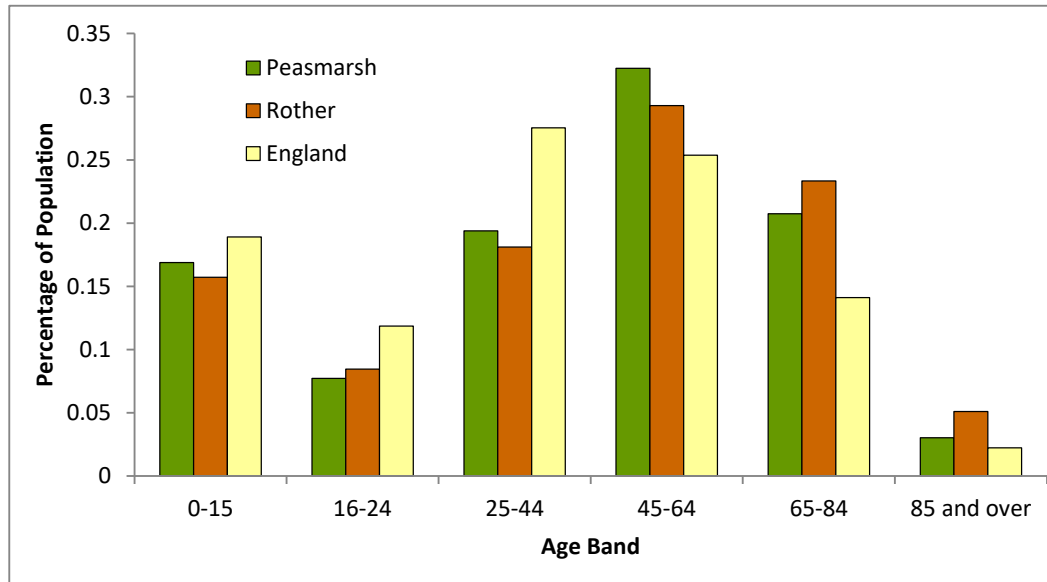
The latest information available at the time of writing is from the 2011 census. This section will be updated or a codicil added once the data from the 2021 census is published.

The population of the parish in 2011 was 1,191, formed into 504 households. There were 557 dwellings recorded, the difference presumably being empty dwellings and holiday lets.

The Office for National Statistics [ONS] indicated that the population in mid-2019 was 1,294, an increase of 103 since 2011, but that is an estimate, not a verified figure.

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The age profile of the parish population in 2011 was typical of many rural villages with fewer younger people and more older people than England as a whole :



Source : 2011 Census data

Figure 2.1 : 2011 Population Age Profile

However Peasmarsh has a reducing percentage of people over the age of 85, reflecting anecdotal evidence that people leave the village as they age whereas Rother as a whole has an increasing population in that age group.

In the same year, ~16% of the population worked in skilled trades, ~14% were in professional occupations and ~12% were in management roles.

More information is available on the population profile in the Equality Impact Assessment which is included as Annexe 1 to the Basic Conditions Statement that accompanies this Plan.

The number of dwellings in 2011 was 557, an increase of 73 since 2001. The Post Office states that in 2022 there are 592 property addresses in the parish. On the other hand, RDC states that 27 new homes were built since the 2011 Census which makes the total dwellings to mid-2022 to be 584.

Again in 2011, slightly over two thirds of these were owned, the rest were rented. Of the rented homes, about two thirds were social rentals and one third were private rental. The social rental percentage was more than that in England as a whole and double that in Rother.

389 of the dwellings are inside the village development boundary.

The parish has a very eclectic mixture of house styles. The houses in the village range from traditional clapboard styles through tile hung exteriors to modern brick-built houses. Roofs are similarly varied ranging from traditional thatch through clay tiles and slates to modern cast tiles.



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2.9 Education

Peasmarsh has both a pre-school and a Church of England primary school, both on the same site on the southern edge of the village centre. The pre-school operates from purpose-built facilities in the grounds of the primary school and accepts children from the age of two onwards. Although co-located with the primary school, the pre-school operates quite separately from it. Most of the children come from Peasmarsh or Rye.

Peasmarsh Church of England Primary School operates on the site of the original parish school in School Lane. That was founded in 1841 and the original building is still in use as part of a much larger complex. The school is rated as 'Good' by OFSTED.

There are seven year groups at the school, each with a Published Admission Number [PAN] of 15 children so a total of 105 children. The PAN is, in theory, the maximum number of pupils that the education authority will admit to that year group. However, the school has an obligation to accept children who live in the area so in some year groups the number of children already exceeds PAN.

What Peasmarsh does not have is a secondary education facility within the parish. Children from 11 years of age upwards have to travel to secondary schools. The nearest East Sussex schools are Rye College [about 5 km / 3 miles from Peasmarsh] and Robertsbridge Community College [about 19 km / 12 miles along country lanes]. Neither has a sixth form. The nearest East Sussex sixth forms are in Hastings and Bexhill.

The majority of Peasmarsh children therefore go to Homewood School and Sixth Form in Tenterden which is across the county border in Kent [about 13 km / 8 miles away, again on country lanes]. That is the case even though the school is currently rated by OFSTED as 'requires improvement'. The problem with that school is that the existing bus service may be withdrawn because Kent is not obliged to provide a service for children living in East Sussex. Stakeholders are concerned that Homewood will no longer accept ESCC children.

It is worth noting that the government indices of deprivation, last published in 2019, reveal that area Rother 002D – Peasmarsh plus part of Rye Foreign – is in the 3rd decile [20 to 30%] of the Education, Skills and Training index.

2.10 Health Services

Peasmarsh is within the area of the East Sussex Healthcare NHS Trust which has two main hospitals, one in Hastings [Conquest, about 19 km / 12 miles away partly on country lanes] and one in Eastbourne [EDGH, about 48 km / 30 miles away mostly on main roads].

There is a small intermediate care hospital in Rye [Rye Memorial Hospital, about 4 km / 2½ miles] from which the NHS offers some services on the basis of professionals visiting from the main hospitals.

The residents of the parish are mainly registered with three main practices : two in Rye and one in Northiam. They tend to be loyal to their particular practice. The parish does not have a medical centre or surgery although Rye Medical Centre used to offer a single monthly visiting doctor service in the Peasmarsh Memorial Hall. The Northiam practice no longer accepts registrations from Peasmarsh residents. Travel to all three practices is difficult due to the public transport issues.

There is a pharmacy within Jempson's supermarket and there is an ambulance station at the Rye Memorial Hospital.

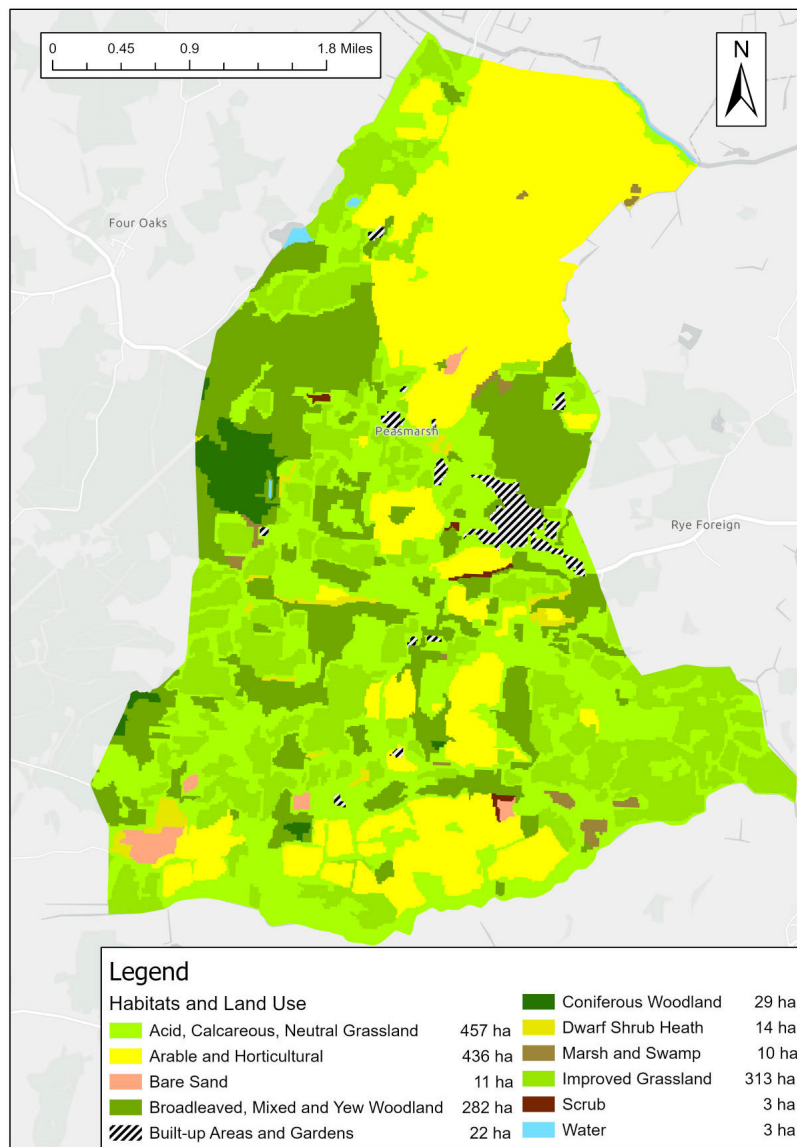


3 Landscape, the Environment and Heritage

Reminder : each map is a link to a larger map : click anywhere on the image to see it.

3.1 Introduction

Peasmarsh is entirely within the High Weald AONB. The primary purpose of an AONB is to conserve and enhance natural beauty. The parish has a variety of habitats from farmland and woods and areas of heathland and scrub. At the northern and southern ends of the parish there are small areas of floodplain grazing adjacent to the rivers Rother and Tillingham respectively :



Source: Natural England. Living Habitat Map (Phase 4) 14 May 2022

Figure 3.1 : Map of Broad Habitats and Land Use

Some three quarters of the total parish land area of 1,581 ha [3,900 acres] is farmed, a further 20% is woodland, 2.6% is other habitats and 1.4% is built-up area.



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The environment can be used to improve water quality, reduce flooding and soil erosion, improve air quality, sequester carbon, restore and enhance biodiversity and nature and increase pollination. It is also a means to improve our health and wellbeing.

Land based enterprises are key to the economic prosperity of the parish. These include farms, vineyards, woods and forestry, hospitality – camp sites, holiday accommodation, pubs and restaurants – and commercial enterprises in redundant farm buildings.

Accordingly, the detailed objectives of the Plan with respect to Landscape, the Environment and Heritage are :

- Support land-based businesses to develop resilient income streams;
- Restore and enhance habitats, biodiversity and nature;
- Support sustainable green infrastructure including renewable energy, traffic free routes and improved public transport in the journey towards net zero;
- Seek positive improvements in the quality of the built, natural, and historic environment;
- Ensure the visual impacts of developments on the landscape and historic assets are kept to a minimum;
- Encourage opportunities for leisure, recreation and community projects;
- Ensure that the tranquillity of the village, including dark skies and the landscape characteristics, is maintained and improved;

3.2 Environmental Designations

Although there are no Sites of Special Scientific Interest [SSSI's] within the parish, there are several in proximity and one – Leasam Wood Heronry – is less than 1km [0.6 miles] from the boundary.

Similarly, the parish is not within a Wetland of International Importance [known as a 'Ramsar' site] but it is, at its closest point, only 1.6km [1 mile] from the internationally recognised Dungeness, Romney Marsh and Rye Bay Ramsar site.

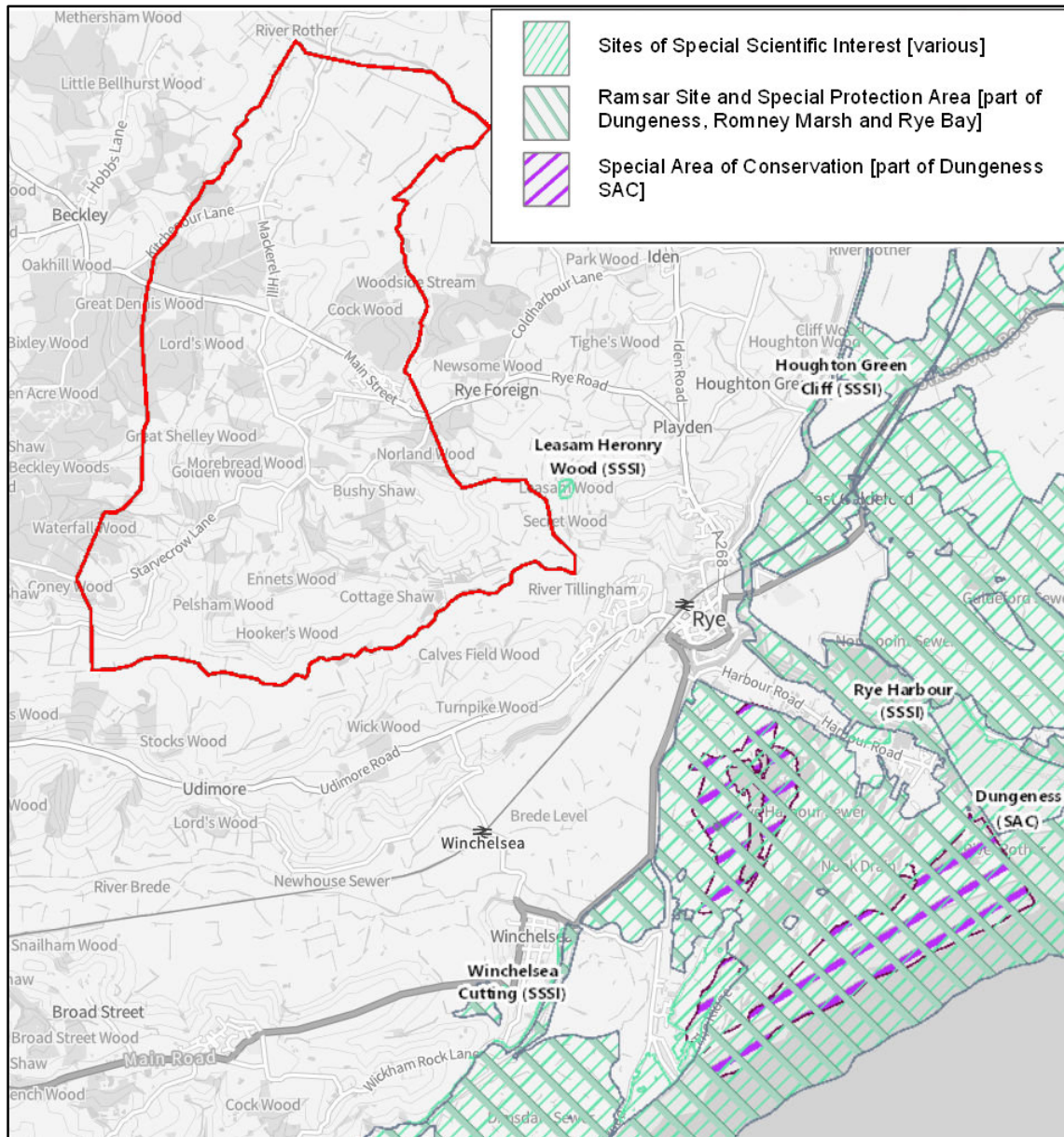
The Ramsar site is also a designated SSSI and a Special Protection Area [SPA] which more or less coincides [there are differences in exact areas covered] with the Dungeness Special Area of Conservation [SAC]. All of the above are shown on the map in Figure 3.2 [over]. The 2017 Conservation of Habitats and Species Regulations require a Habitats Regulations Assessment [HRA] of the risk to any Special Area of Conservation [SAC] or any Special Protection Area [SPA].

RDC's screening opinion³ is that its 2018 Habitats Regulations Assessment is still applicable. The HRA was prepared by AECOM with the stated objective :

"... to identify if any particular site allocations and policies have the potential to cause an adverse effect on Natura 2000 or European designated sites (Special Areas of Conservation, SACs, Special Protection Areas, SPAs, and Ramsar sites designated under the Ramsar convention), either in isolation or in combination with other plans and projects, and to determine whether site-specific mitigation measures are required."

³ <https://www.peasmarshndp.uk/vault15/HRAScreening.pdf>

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Source : MAGIC December 2022 © Crown Copyright and database rights [2022]

Figure 3.2 : Map of Designated Sites Relative to Peasmarsh Parish

With respect to Peasmarsh, the assessment considered site PEA1 [‘Pippins’] noting that the Dungeness Romney Marsh and Rye Bay SPA/Ramsar site was 4.5 km south east. It concluded the development of 45 houses on PEA1 would have “*no likely significant effect*” on the basis that “*it lies a considerable distance from any designated site*”.

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Three of the four sites identified in this Plan are as far or further from the SPA/Ramsar site as PEA1 and the fourth is still 3.7 km [2.3 miles] away so it can be concluded that none would have a likely significant effect.

In addition to the major designations already discussed, a significant part of Peasmarsh lies within the Rother, Brede and Tillingham Woods Biodiversity Opportunity Area [BOA]. A small part of the parish on the banks of the Rother river is within the Romney Marsh BOA :

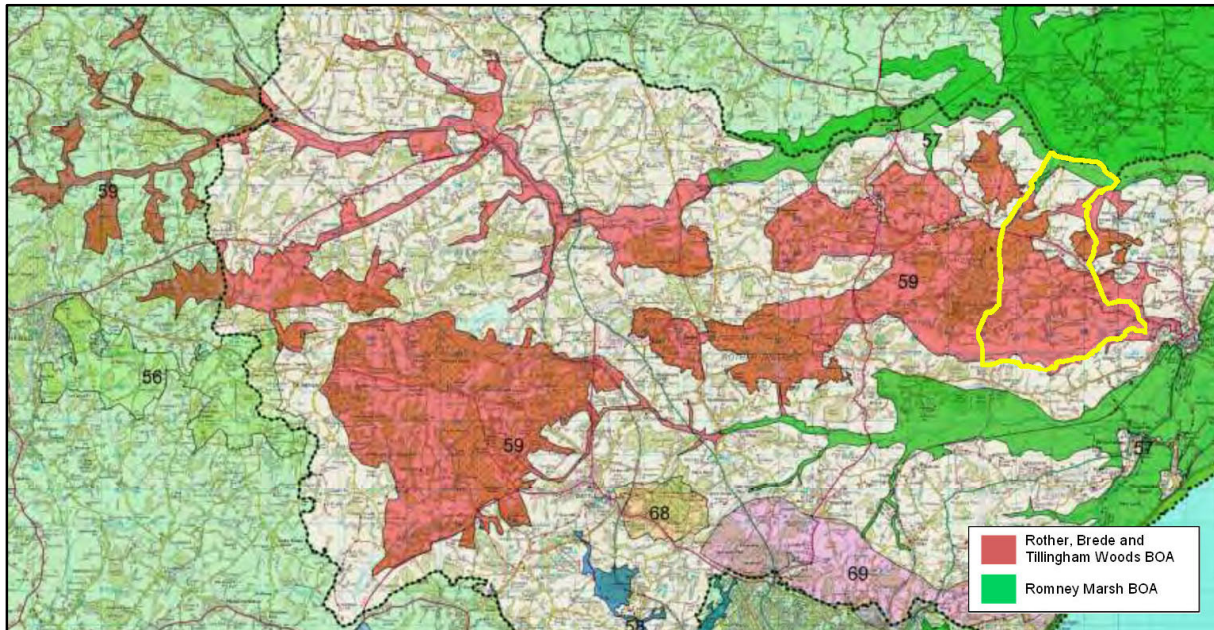


Figure 3.3 : Map of Biodiversity Opportunity Areas

BOA's are aggregations of the government's Biodiversity Action Plan [BAP] habitats, considered to be most important for habitat enhancement, restoration and creation of BAP habitats.

3.3 Landscape Character

The landscape characteristics of the High Weald AONB are evident in the parish of Peasmarsh. Today's parish is the result of man's effects on the landscape over the millennia, ranging from altered water courses and remnant woodland to cultivated land, ancient routeways and settlement

Land use is influenced by the quality of the land available for agricultural use. The Agricultural Land Classification⁴ [ALC] framework is used to classify agricultural land in England and Wales and referred to in National Planning Policy which protects 'best and most versatile' land – Grades 1, 2 and 3 [subdivided into subgrades 3a and 3b].

83% of the parish is grade 3 with a small area (44ha) of grade 2 alongside the River Rother. Grade 3 is 'good to moderate quality land' with moderate limitations. Nonetheless it presents, as it has done historically, good opportunities for food production.

Non-agricultural land is land primarily in other uses and in the parish this is mainly woodland.

⁴ <http://publications.naturalengland.org.uk/file/5526580165083136> [large pdf file]

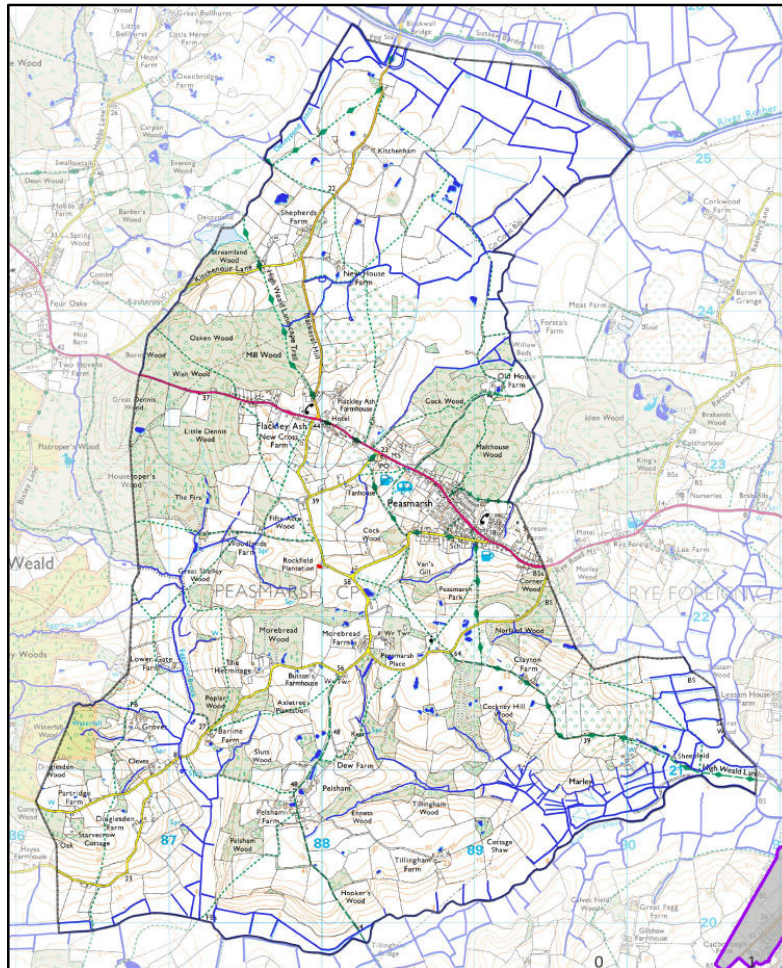
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3.3.1 Underlying Nature

According to The Conservation Volunteers⁵, man arrived in southern England towards the end of the Mesolithic period, some 7000 years ago. He would have found a wooded land with grassland areas. There is evidence of the beginnings of agriculture towards the end of period when the changes to the natural landscape started to occur.

The topography of the parish will only have been modified in very minor ways and the geology will not have changed at all [there is one sandstone outcrop – so typical of the High Weald – in the parish].

The same cannot be said of the water systems with natural and manmade changes both occurring. The major natural change would have been in the late 13th century when the course of the River Rother was changed by major storms so that the north of the parish – until then part of a large natural harbour – became drainable. The same was probably true of the River Tillingham. Extensive, clearly manmade, drains exist in both valleys :



Source : part of High Weald AONB map

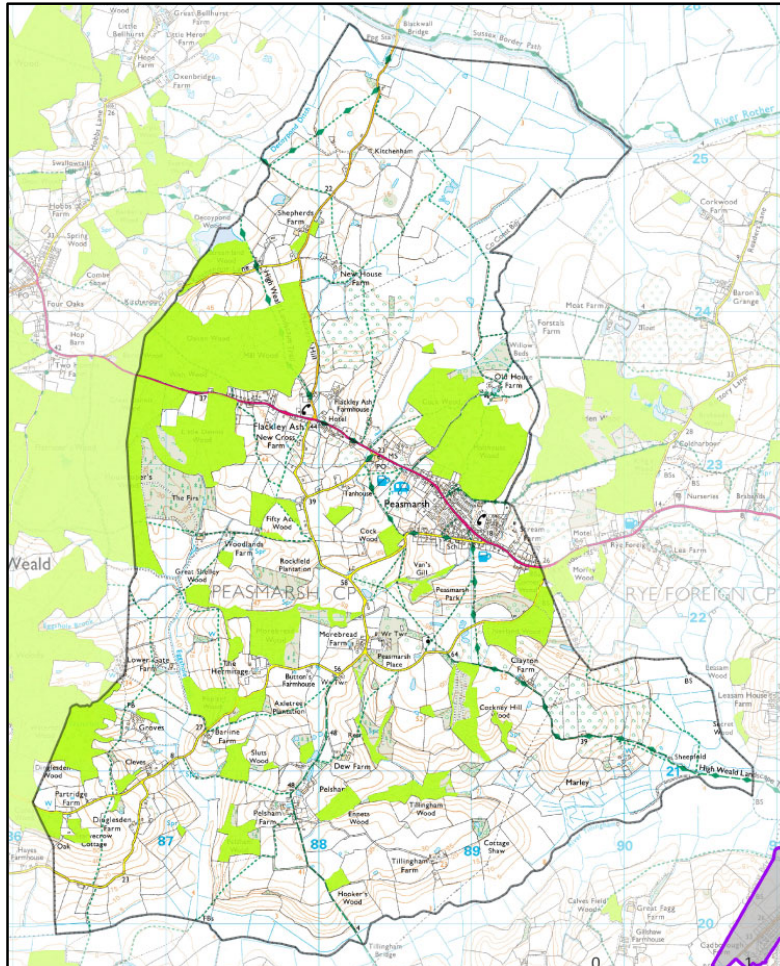
Figure 3.4 : Map of Geology, Landform and Water

⁵ <https://www.conservationhandbooks.com/woodlands/a-brief-history-of-woodlands-in-britain>

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As is discussed further in section 3.5.1 and 3.5.2, there is still a significant amount of ancient woodland remaining in the parish, albeit managed woodland rather than the wildwood of the Mesolithic period :



Source : part of High Weald AONB map

Figure 3.5 : Map of Ancient Woodland

Significant to the Plan, a large area of ancient woodland – Malthouse Wood and Cock Wood – flanks the village to the north, whilst Corner Wood marks the south eastern boundary of the village. Further afield, to the west lies an even larger area of ancient woodland, an agglomeration of at least 7 separately named woods.

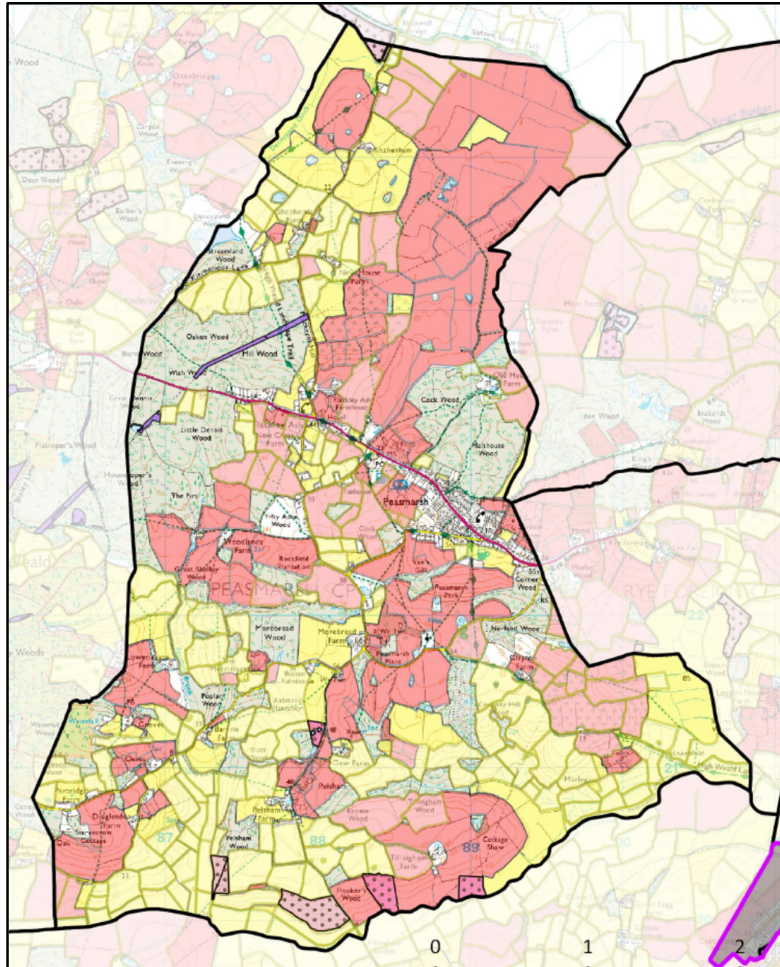
3.3.2 Manmade Aspects

On the underlying natural landscape, both original and man modified, lie a range of aspects which are strongly modified or totally created by man. These range from medieval fields and historic field boundaries, to routeways including droveways and sunken lanes to the settlements now evident.

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Fields at the village edge are characterised by High Weald AONB historic field boundaries. These form a part of the habitat mosaic of the essentially medieval landscape of the High Weald AONB and often comprise habitat-rich ancient hedgerows which create connectivity between woodland and other habitats for wildlife :



Source : part of High Weald AONB map

Figure 3.6 : Map of Field Systems

Medieval fields are tinted in yellow [those in pink are later fields] with known historic field boundaries in wider brown.

The parish is rich in historic routeways. Those that have been identified are show on the map in Figure 3.7 [over]. The original route out of Rye to what would have been the centre of the original village around the church and its onward progress is clearly visible.

What is not separately identified is the deeply sunken lane which is at the east end of Starvecrow Lane, a lane which runs from the general neighbourhood of the original village to the southwest in the direction of Broad Oak.

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Source : part of High Weald AONB map

Figure 3.7 : Map of Historic Routeways

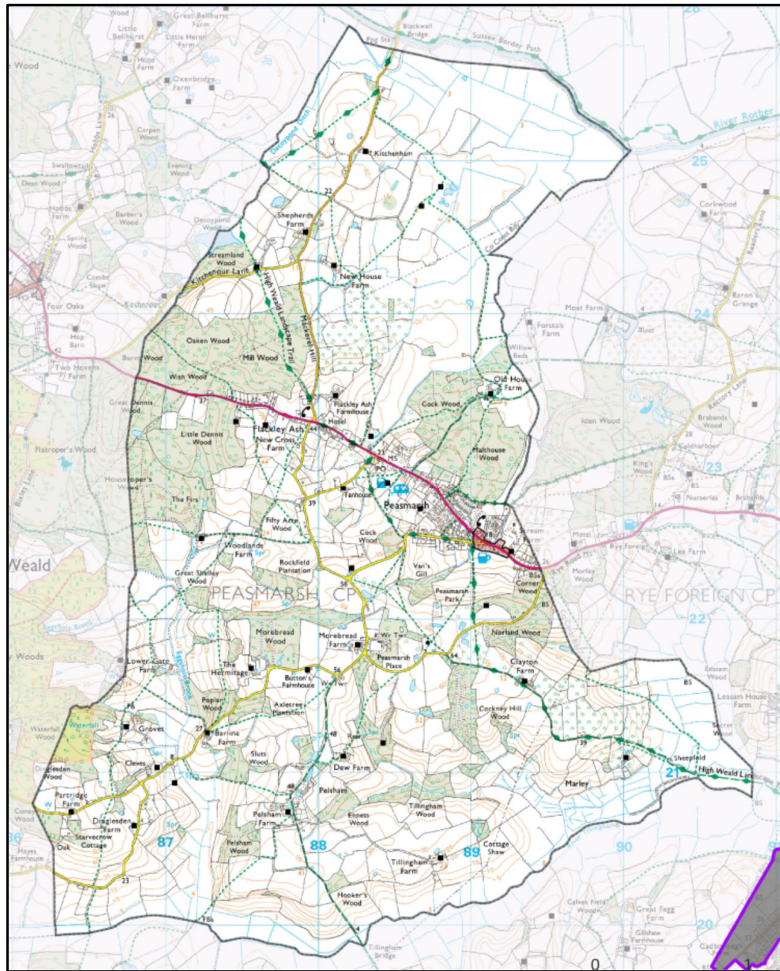
Finally, the aspect of the landscape strongly modified by man – in this case entirely manmade – is the settlements. Those that have been identified are shown on the map in Figure 3.8 [over].

Most of the settlement is scattered farmhouses throughout the parish. The stated extent of the village in circa 1860 is shown as a small area at the junction of main Street and School Lane but that is very much at odds with 1840 Tithe map which can be inspected in Figure 2.3, Section 2.3 of Addendum D6, the Peasmarch Villagescape and Design Scope, unless there was a substantial reduction in houses between 1840 and 1860.

Peasmarch currently has 55 listed buildings⁶, including the Grade I listed 11th century parish church and two Grade II* buildings, about 10% of the total addresses. [Note that Historic England lists some properties which are not in the parish under 'Peasmarch'.]

⁶ <https://historicengland.org.uk/listing/the-list/results/?searchType=NHLE+Simple&search=peasmarch+east+sussex>

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Source : part of High Weald AONB map

Figure 3.8 : Map of Historic Settlement

In addition there is a significant number of non-designated heritage assets in the parish. A project has been set up in Section 10 of the Plan to record them.

The importance of heritage assets, whether designated or not, lies not just in the building itself but its setting within the greater landscape

It is important that all the landscape characteristics discussed above are protected and preferably enhanced by any development that might take place in the parish.

3.3.3 Protection and Enhancement of the Landscape and Historic Assets

Rother has two policies already in place to protect and enhance the landscape and historic assets :

- Policy EN1 : Landscape Stewardship
- Policy EN2 : Stewardship of the Historic Built Environment



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Policy EN1 ensures the protection, and wherever possible enhancement, of locally distinctive landscapes and landscape features. It specifically mentions the following particularly pertinent to Peasmarsh :

- the distinctive identified landscape character, ecological features and settlement pattern of the AONB;
- the distinctive low-lying levels to the east of the district
- open landscape between clearly defined settlements, including the visual character of settlements, settlement edges and their rural fringes;
- ancient woodlands;
- tranquil and remote areas, including the dark night sky;
- other key landscape features across the district, including native hedgerows, copses, field patterns, ancient routeways, ditches, and ponds and water courses

Policy EN2 ensures the protection of historic assets, whether designated or not, by requiring developments to

- reinforce the special character of the district's historic settlements through siting, scale, form and design;
- take opportunities to improve areas of poor visual character or with poor villagescape qualities;
- preserve, and ensure clear legibility of, locally distinctive vernacular building forms and their settings, features, fabric and materials, including forms specific to historic building typologies;
- reflect current best practice guidance produced by English Heritage and HELM59;
- ensure appropriate archaeological research and investigation of both above and below-ground archaeology, and retention where required;

The two policies combined will ensure that, in general, the parish landscape and historic assets will be protected when taken with policies which are established in this section of the Plan. Accordingly, in line with Planning Practice Guidance, the Plan does not have a separate overarching policy which might have, in any case, weakened the Rother policies.

3.4 Locally Significant Views

Protecting key panoramic views and mitigating the visual impacts of developments on the landscape and designated and non-designated heritage assets are key constraints for potential developments. As part of that, development proposals must be designed in a way that safeguards locally significant views.



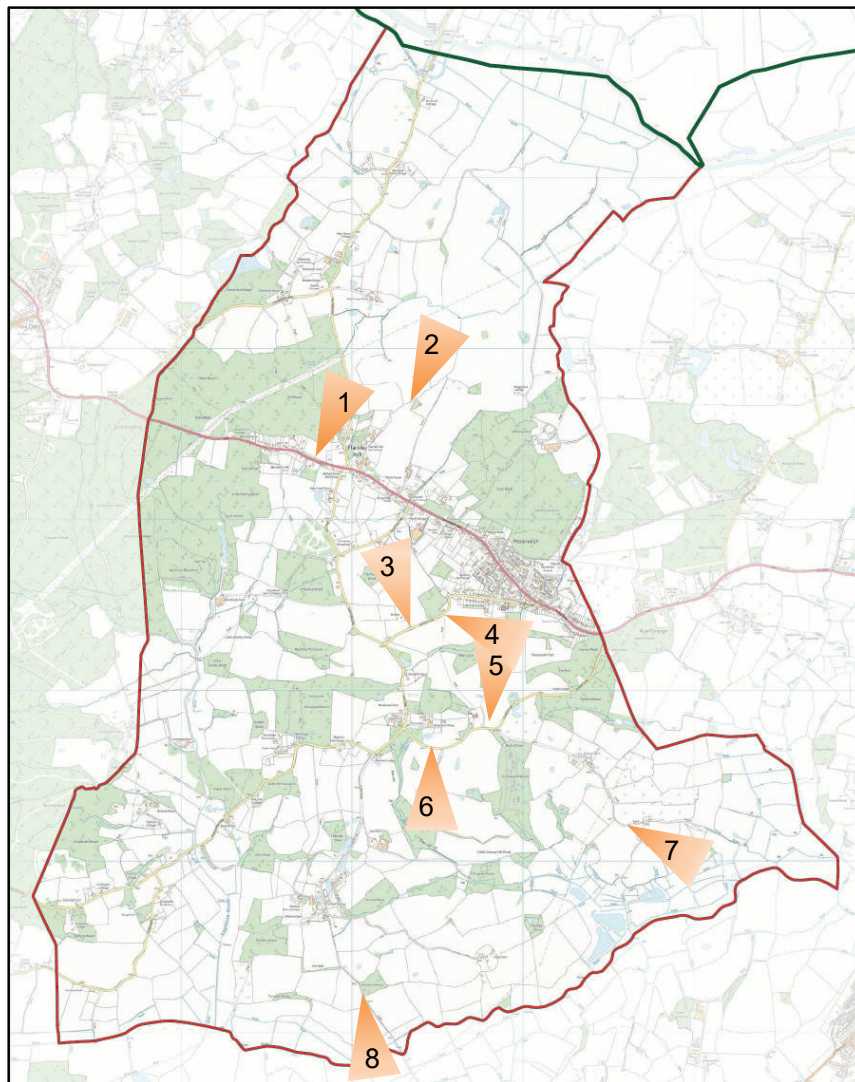
View from PRow PSM/22/1 towards Romney Marsh

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All views within the High Weald AONB are, *de facto*, protected. However, a neighbourhood development plan allows one to identify and protect particular locally significant views.

One of the issues with Peasmarsh, being a rural parish in the AONB, is the large number of potential landscape views that might be so protected, particularly given the central ridge which provides views across the valleys on either side to distant locations. It was decided that only views from roads or public rights of way would be considered.

A short report was developed considering both potential locally significant views and local green spaces [see Section 3.6.1], initially with proposals from the PNDP group. That was then put to the stakeholders to change as was seen fit. The final document is contained in Appendix 4 to the Plan. The views selected are shown on the map in Figure 3.9 :



Source : PNDP information

Figure 3.9 : Map of Locally Significant Views

The associated policy is shown over.



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Policy L1 : Protection of Locally Significant Views

As appropriate to their scale and nature, development proposals within the shaded arcs of the views below, mapped in Figure 3.9, should be designed in a way that safeguards the locally significant view or views concerned :

- | | |
|--------|---|
| PMLV01 | from Main Street [A268] opposite Old Winders looking north across the Rother Valley |
| PMLV02 | from the fields above Sharvels Farm on PRoW PSM/8/2 looking north across the Rother Valley towards Wittersham |
| PMLV03 | from School Lane at Bushy looking north west towards Flackley Ash and beyond |
| PMLV04 | from PRoW PSM/22/1 looking east |
| PMLV05 | from the fields behind the Church on PRoW PSM/24/3 looking north towards Wittersham |
| PMLV06 | from Church Lane looking south towards Fairlight and Hastings |
| PMLV07 | from Clayton Farm on PRoW PSM/32/4 south/south looking east towards Rye and the sea |
| PMLV08 | from Tillingham farm on PRoW PSM/30/5 looking south across the valley to Udimore |

Development proposals in parts of the parish beyond these view arcs should identify and, where possible, integrate views across the High Weald, in particular where these can be enjoyed by the general public.

Conformity references : NPPF : 128, 129, 130, 134, 176; RDC : Core: EN1, EN2; DaSA: DEN1, DEN2; HWMP : OQ4;

The policy provides the flexibility required for the wide range of development proposals which will come forward within the Plan period. In the majority of cases proposals will be of a minor nature and will have little or no effect on the identified views.

In circumstances where the proposed development would be likely to have an impact on any identified locally significant view, the planning application concerned should be accompanied by an assessment of landscape impact on the identified view or views. Any appropriate mitigation measures should be incorporated within the design of the development proposed and captured in the assessment.

3.5 Habitats, Trees and Woodland and Biodiversity

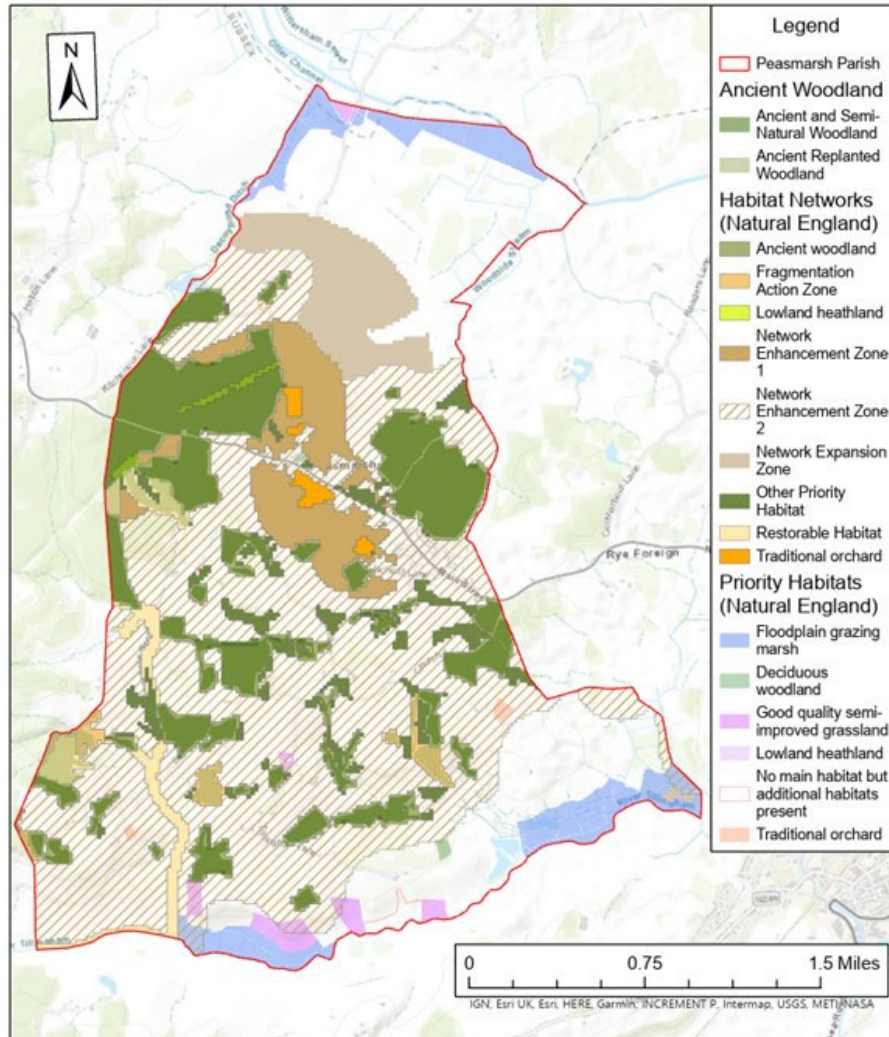
3.5.1 Habitats

The variety of parish habitats was discussed in Section 3.1 and shown on the map in Figure 3.1 [qv].

The data is from Natural England's Living Habitat Map (Phase 4) which was last updated 14 May 2022. It should be noted that the habitat probability map displays modelled likely broad habitat classifications, trained on field surveys and earth observation data from 2021 as well as historic data layers and may not be 100% accurate.

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Almost one third of the parish land area is designated priority habitat as shown on the map in Figure 3.10 and listed in Table 3.1 :



Source : Natural England

Figure 3.10 : Map of Priority Habitats and Networks

Priority Habitats	Area (ha)	% of Parish
Lowland heathland	2	0.1%
Traditional orchard	7	0.5%
No main habitat but additional habitats present	19	1.2%
Good quality semi-improved grassland	23	1.4%
Coastal and floodplain grazing marsh	117	7.4%
Deciduous woodland	327	20.7%
All Priority Habitats	495	31.3%

Source : Natural England

Table 3.1 : Priority Habitats



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The dataset used describes the geographic extent and location of habitats of principal importance in the Natural Environment and Rural Communities Act (2006) Section 41⁷ and doesn't necessarily agree with the dataset used in Section 3.1.

Over 20% of the total area of the parish is deciduous woodland and grazing marsh is another 7.4%. Beyond the priority habitats, much of the rest of the parish is designated as potential habitat network zones. A habitat network is a configuration of habitat that allows particular species to move and disperse through a landscape. For example, a woodland habitat network focuses on how woodland species utilise woodland habitat and disperse through this and other habitat types in the wider landscape. Habitat networks therefore have a key role in maintaining the health of the ecosystem.

Although the parish is endowed with such a high percentage of priority habitats and the potential to improve them still further by enhancing existing habitats and establishing new habitat networks, such assets bring responsibility too : the habitats and networks must be protected.

RDC already has two existing policies relating, at least in part, to the protection of habitats :

- Policy EN5 : Biodiversity and Green Space *[from the 2014 Core Strategy]*
- Policy DEN4 : Biodiversity and Green Space *[from the 2019 DaSA]*

Policy EN5 ensures the protection, and wherever possible enhancement, of Biodiversity, geodiversity and green space. It specifically mentions two aspects of habitats relevant to Peasmarsh :

- the management, restoration and creation of habitats in line with the opportunities identified for the biodiversity opportunity area;
- ensure the retention, protection and enhancement – and subsequent management – of habitats of ecological interest;

The emphasis is very much on habitats in general and biodiversity and not specific habitats;

Policy DEN4 supplies criteria to be applied for developments to comply with EN5. It specifically mentions one aspect of habitats :

- developments should seek to conserve and enhance priority habitats and species; and protected species, both within and outside designated sites;

This policy is more specific but needs developing further for the PNDP, in particular with respect to potential habitat network zones.

Policy L2 : Protection of Habitats

Development proposals must safeguard the future health and retention of habitats in the parish, particularly priority habitats listed in Table 3.1 and shown in Figure 3.10 together with the associated habitat network zones. Development proposals which would unacceptably impact on the future health and retention of habitats will not be supported.

Conformity references : NPPF : 179, 180, 190; RDC : Core: EN1, EN5; DaSA: DEN2, DEN4, DEN7; HWMP : G3, R2, W1, W2, FH3;

⁷ <https://www.legislation.gov.uk/ukpga/2006/16/section/41>



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One of the issues with the environment, and one priority habitat in particular, is the known contamination of Woodside [variously Corkwood] Stream and hence the River Rother with raw sewage. As discussed in Section 4.3.4, in 2021 alone there were 38 instances recorded with a total of 193 hours of discharge.

This threat to human health and the environment is a direct result of the responsible company not calculating system capacity on the basis of a combined sewer [both foul and surface water] even though it knows and accepts that to be the case because the older houses in Peasmarsh village have combined discharges. This is discussed in more detail in Section 4.3.4 and a policy [I2] is established.

3.5.2 Trees and Woodland

Most of the woods in the parish are designated as Ancient Woodlands or Plantations on Ancient Woodland Sites [see Figure 3.5].

Objective W2 of the 2019-2024 High Weald Management Plan [HWMP], seeks to enhance the ecological functioning of woodland at a landscape scale.

The rationale of the objective is to increase the viability of the woodland habitat for wildlife, by identifying and extending the area of appropriately managed woodland [including restoring planted ancient woodland] to link and enhance isolated habitats and species populations. In other words, to create a woodland habitat network and connectivity routes for wildlife.

Such a network provides greater connectivity between woodlands and other important wildlife areas which helps facilitate species response to climate change. Therefore, opportunities could arise to connect green corridors to local woodlands and habitats – these include new hedges.

The potential habitat network zones shown in Figure 3.10 may provide opportunities to enhance or restore current habitats or create new habitats. With respect to trees and woodland, these include :

- woodland and hedges;
- landscape action priorities of conservation and restoration of coppices, woodlands and traditional orchards;
- restoration of hedgerows and tree pattern in arable areas;

These initiatives may also generate new income streams for landowners through environmental land management schemes, biodiversity, carbon and nutrient credits.

An example of a developing woodland habitat network is shown in Figure 3.11 [over]. The area is south of Church Lane, the church just being off the image to the north. Marlpit Shaw, Ennets Wood, Tillingham Wood, Dew Gill and Cockney Hill Wood are all linked – either strongly or less so – to form a woodland habitat. There are other opportunities in the parish to achieve similar networks.

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Source : Google Earth

Figure 3.11 : Developing Woodland Habitat Network

Policy L3 : Protection of Trees and Woodland

Development proposals must safeguard the future health and retention of ancient woodland, protected trees and ancient or veteran trees and seek to encourage the creation or extension of woodland habitat networks. Development proposals which would unacceptably impact on the future health and retention of ancient woodland, protected trees and veteran or ancient trees will not be supported.

Conformity references : NPPF : 179, 180, 190; RDC : Core: EN1, EN5; DaSA: DE1, DE2, DE4; HWMP : W1, W2;

3.5.3 Biodiversity

The Government's Agriculture⁸ and Environment⁹ Acts which have become law since Brexit – and certainly since the RDC Policies were adopted – give a different approach to land management and aim to leave the natural environment in a measurably better state than before with public support for public gains.

⁸ <https://www.legislation.gov.uk/ukpga/2020/21/contents>

⁹ <https://www.legislation.gov.uk/ukpga/2021/30/contents>



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The introduction of this approach and related services will influence the way a wide range of people and organisations work, including landowners, estate managers and farmers; local planning authorities, developers, NGOs, consultants, professional bodies, government organisations and the general public.

Under the Environment Act, all planning permissions granted in England, with the likely exemptions of householder applications, permitted development [limited house extensions where planning permission is deemed to exist] and possibly change of use, will have to deliver at least 10% 'biodiversity net gain' [BNG] from an as yet unconfirmed date, expected to be in November 2023. BNG will be measured using Defra's biodiversity metric and habitats will need to be secured for at least 30 years. This requirement sits alongside :

- a strengthened legal duty for public bodies to conserve and enhance biodiversity;
- new biodiversity reporting requirements for local authorities; and
- mandatory spatial strategies for nature : Local Nature Recovery Strategies [LNRS];

More information and clarification is expected later in the year but the BNG habitat can be delivered on-site, off-site [ideally on adjacent or nearby land] or via statutory biodiversity credits. The project is likely to score more highly if the habitat is located in an area of strategic significance for biodiversity – for example creates connectivity between habitats. This might lead to the opportunity for the parish of Peasmarsh to be a 'host' parish for BNG.

Rother District Council considers environmental issues as a key priority, having declared a climate emergency in September 2019 and pledged to become carbon, and other noxious gas, neutral by 2030. Increasing biodiversity is an integral part of achieving these goals – the council pledged to achieve higher than the 10% Biodiversity Net Gain requirement but have not yet stated what this will be. It could be 20% or even 30%. Whatever figure is decided that will be the minimum BNG required across RDC including the parish of Peasmarsh.

Policy L4 is established in order to encompass what is anticipated will become law and/or RDC policy in due course.

Policy L4 : Protection of Biodiversity

All development must contribute to a 15% net gain in biodiversity within the development site or offset within the parish as required by and measured in accordance with the Environment Act of 2021. Should Rother subsequently introduce a higher biodiversity net gain requirement then that higher value shall apply.

Householder applications and permitted development do not have to seek to achieve this level of biodiversity net gain.

Development proposals which do not comply with this policy will not be supported. Planning applications must be accompanied by a biodiversity net gain report setting out the baseline and proposed method of achieving the gain.

Proposals to use parish land as a biodiversity net gain host for other locations will be supported provided that they comply with all other policies in this Plan.



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In considering biodiversity net gain there should be an awareness of environmental net gain. Expanding biodiversity to include wider natural capital benefits including water quality, flood protection, recreation & air quality are important aspects of the ecosystem which should not be neglected.

3.6 Health and Wellbeing

Health and wellbeing is an important aspect of the Plan as the potential benefits of increasing physical activity for all ages and abilities through active travel, recreation / play and connected neighbourhoods is significant. There are also the mental and wellbeing benefits associated with access to nature and quality built and historic environments.

Increasing health and wellbeing will have a positive impact on our local health care provision.

The Plan seeks to enable and support healthy lifestyles, targeting identified local health and well-being needs – for example, through the provision and maintenance of safe and accessible green infrastructure with increased access to healthier food, allotments and layouts that encourage active travel.

However, being a widely dispersed rural community also means that passive [motorised] travel will play an important part for the foreseeable future. It is important that this is sustainable as the country transitions towards the net zero target.

Health and well-being are often enhanced by perceptual qualities. In the parish these may include distinctive features [e.g. Wealden hall houses], scenic beauty [views], a sense of naturalness, dark skies and tranquillity. These are often difficult to quantify but can be enhanced with sympathetic development and the way we conserve and enhance the environment around us.

Some of these are dealt with in other parts of the Plan, in particular Policies D1 : Local Setting, D2 : Placemaking and D5 : Dark Skies.

RDC policy RA1 requires that new development be in locations accessible via a range of transport options in order to improve access to basic day-to-day services, particularly by public transport, walking and cycling. Designating somewhere as a Local Service Village without considering public transport goes against that policy.

RDC also has a green policy in which case the availability of public transport and good walking and cycling routes is essential to minimise the risk of social exclusion, particularly for people without access to a car.

3.6.1 Local Green Spaces

People's access to natural spaces is known to improve the quality of life, with benefits to health and well-being. Whilst access to natural green space is beneficial to human health and well-being, there will be some areas where this will not be appropriate as access may be detrimental to sensitive habitats and/or species. Peasmarsh enjoys reasonable accessibility to natural and semi-natural greenspace through the network of public rights of way. This adheres to the standards established in Rother's Core Strategy Policy CO3.

However, the more demanding Natural England standard ANGSt suggests a need for more local accessible natural greenspace [see Map 8 of the RDC Green Infrastructure Study¹⁰].

¹⁰ https://www.rother.gov.uk/wp-content/uploads/2020/01/Green_Infrastructure_Background_Paper.pdf
[large pdf file]

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Most of the parish also appears to conform to the Woodland Trust's standards for accessible woodland ¹¹[as presented spatially in Map 9 and Appendix A1 of the RDC Green Infrastructure Study].

Paragraphs 98 to 103 of the NPPF relate to open space and recreation. Paragraph 101 notes that neighbourhood plans allow “communities to identify and protect green areas of particular importance to them” and paragraph 103 requires that “Policies for managing development within a Local Green Space should be consistent with those for Green Belts”.

Local green space designation allows this Plan to provide protection to areas that are, and historically have been, important to stakeholders.

A short report was developed considering both potential local green spaces and locally significant views [see Section 3.4], initially with proposals from the PNDP group. That was then put to the stakeholders to change as was seen fit. The final document is contained in Appendix 4 to the Plan.



The Recreation Ground and Pavilion

Policy L5 : Protection of Local Green Space

The Plan designates the following local green spaces, also shown in Figure 3.12 :

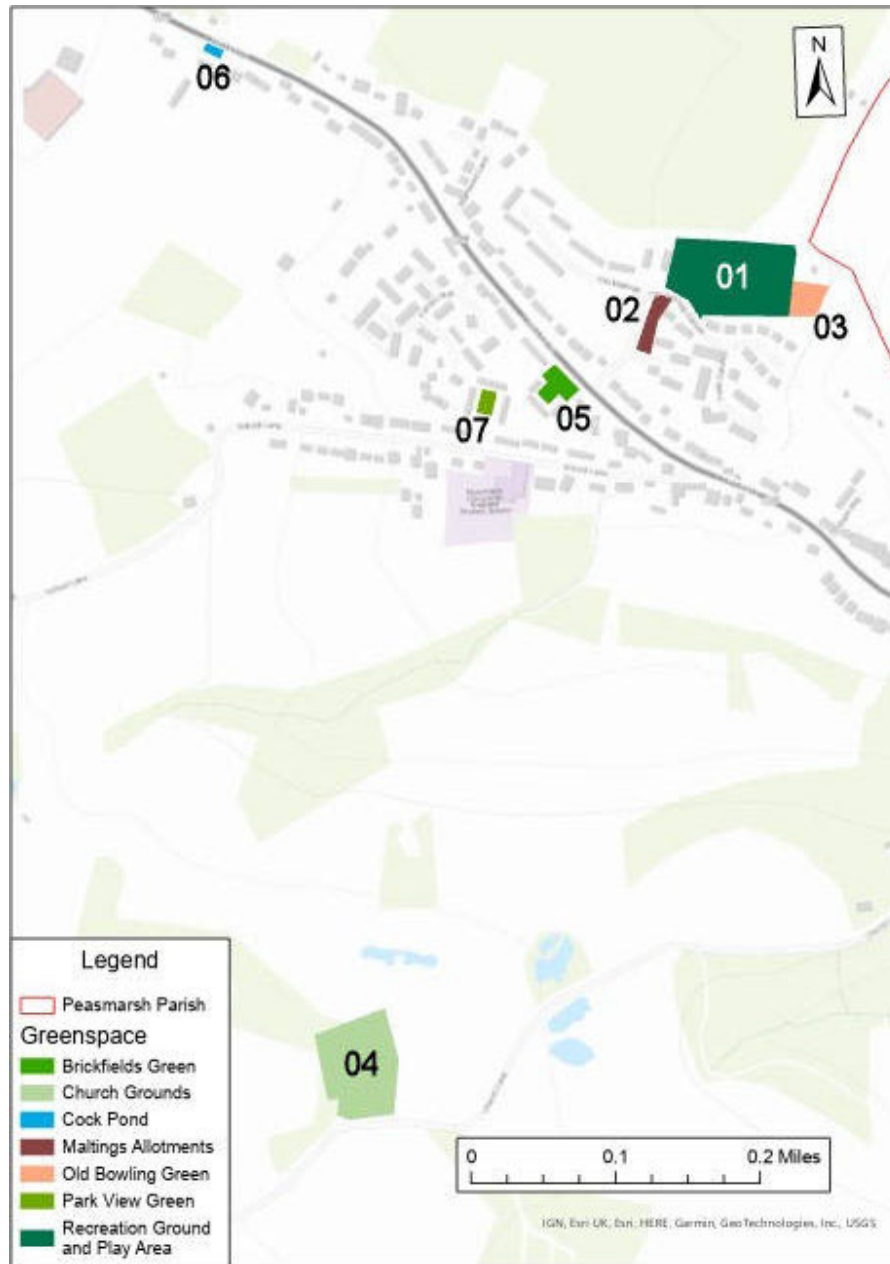
PMGS01	Recreation Ground and Play Area
PMGS02	Maltings Allotments
PMGS03	Old Bowling Green
PMGS04	Church Grounds
PMGS05	Brickfield Green
PMGS06	Cock Pond
PMGS07	Park View Green

Development proposals within the designated local green spaces will not be supported except as permitted by the NPPF regulations with respect to proposals in the Green Belt.

Conformity references : NPPF : 92, 93, 98, 99, 101, 102, 103, 147, 148, 149, 150 and 151;
RDC : Core: EN5; DaSA: DEN4; HWMP : OQ3;

The green spaces selected are shown on the map in Figure 3.12 [over].

¹¹ <https://www.woodlandtrust.org.uk/media/1788/access-to-woodland-position-statement.pdf> [large pdf file]



Source : OS Greenspace, ESCC and local knowledge

Figure 3.12 : Map of Local Green Spaces

3.6.2 Traffic-free Greenways

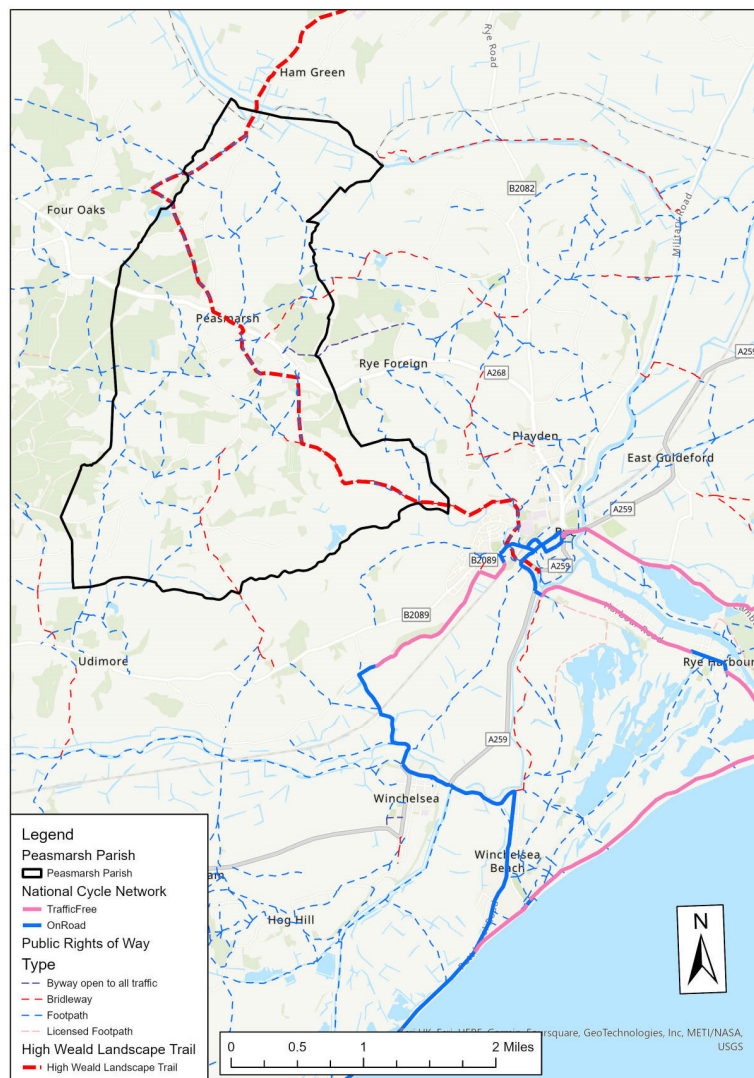
Traffic-free Greenways provide safe, accessible routes for walking, riding, and cycling and including disabled users. This is not just important for the health and wellbeing of stakeholders but is also an important aspect of the tourism sector, as discussed in Section 5 of the Plan.

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Peasmarsh and the surrounding area is well serviced with Public Rights of Way [PRoW's] as shown on the maps in Figures 3.7 [qv] and 3.13 [below]. That includes the High Weald Landscape Trail [HWLT], a 145 km [90 mile] route that meanders through the High Weald AONB from Rye to Horsham and passes through the village along the ancient roadway from Rye.

The dangers of walking or cycling along the A268 to Rye have already been discussed in Section 2. However, there are routes which have the potential, subject to being viable and working with landowners, to be developed into traffic free multi-user networks linking Rye, the surrounding villages and diversified farm enterprises resulting in a zero-carbon boost to the local rural economy.



Source : East Sussex County Council

Figure 3.13 : Map of Public Access and Connectivity



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3.6.3 Safe Active Travel Routes within the Village

What is not well provided for are safe, practical active travel routes within Peasmarsh village for everyday living : getting to school, getting to the supermarket and getting to the recreation ground being the obvious requirements. As discussed in Section 4.3.2, that extends even to not having pavements or only having unsafe pavements.

The immediate and specific issues are the lack of a pavement along the full length of the built-up section of School Lane, the lack of a safe pavement along the A268 from Tanhouse Lane going west [despite it being the route of the HWLT and a 40 mph zone], the lack of maintenance and hence an inadequate surface on the HWLT from School Lane to Jempson's campus, similarly Malthouse Lane behind the Maltings.

There are two safe footpaths between the lower reaches of School Lane and Main Street. The lower one is a natural route from the school into the Maltings but the crossing at Main Street is not safe although it does have a central island. There should be a pedestrian crossing at this point.

There is a natural route from School Lane along the HWLT footpath [PRoW PSM/18/3] as far as the Jempson's campus. This might make a suitable pilot project for an active travel route but some of the issues have already been touched upon : the lack of a pavement on School Lane – already a narrow road – and the poor state of the footpath surface. In addition, there are three styles along its length which means that it currently is not fully accessible for all.

Where there is no natural route at the moment is a connection from School Lane to Main Street at its widest point, i.e. across the Central Paddocks area. It too would have the disadvantage of the lack of a pavement on School Lane which emphasises how important the need for such a pavement really is.

The 2019 DaSA suggests a route through the PEA1 [Pippins] site but it is a long dog-legged route which ends halfway along PRoW PSM/18/3.

Policy L6 : Retain and Improve Public Access

The Plan encourages green infrastructure for all developments. Green infrastructure outside of new developments will also be supported. Where appropriate, development proposals will be expected to include green infrastructure enhancements within the parish. That includes traffic-free routes and improvements to the local public access networks with particular consideration of the historic routeways as shown in Figure 3.7.

Conformity references : NPPF : 85, 92, 93, 98, 99, 100; RDC : Core: RA1, CO6, TR2, TR3; HWMP : R1, R2;

3.6.4 Motorised but Sustainable Travel

Motorised travel covers a range of travel modes, primarily private car and the many types of public transport but also motorbikes and potentially e-scooters and similar. E-bikes might also be classed as motorised although they are sufficiently active travel devices to be used on traffic-free routes.



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There are two reasons why stakeholders use motorised travel modes : getting about the parish – even if getting from a home in the countryside to public transport – and getting from the parish to a remote destination, even if that is just to Rye or Northiam.

At the time of the 2011 census, 82% of the working population in Peasmarsh worked away from home, 39% travelling more than 10 km to get to work. The vast majority [76%] used a private vehicle to do so, only 5.7% using public transport.

It has to be acknowledged that the amount of working from home has probably increased since 2011 but, equally, the quality of public transport has been degraded since then. What has also changed since the census is the introduction of electrical vehicles which is, at least, a step towards sustainable travel.

Accessing jobs and services is fundamental to a good quality of life.

Appendix 4 to this Plan includes a summary of the issues with public transport. In the public consultations, a frequently mentioned issue with public transport was that timetables and/or destinations are unsuitable for most stakeholders' working and travel patterns.

In addition, lack of integration in public transport services leads to missed connections and long delays, discouraging future use of public transport. This goes against RDC policy TR2 to maximise the use of the existing public transport network. Even when there should be interconnection, the bus service is frequently late.

Rural bus services have a greater impact on achieving the net zero obligation than urban services as distances to be covered are greater than in towns. This is not adequately recognised by planners.

The frequently heard argument is that improvements to rural services cannot be justified because the service is not used sufficiently, an example of self-fulfilling prophecy. As recently as November 2022 another of the buses was withdrawn.

In the case of Peasmarsh there should be a truly frequent bus service operating from early morning to late evening and that service's timetable should be integrated with the bus and rail services from Rye. That would allow stakeholders to use the bus service for both local needs [going to Tenterden for instance] and longer commutes via Ashford or Hastings.

In addition, the possibility of community transport services, including Demand Responsive Transport [DRT], exist and should be explored.

DRT provides a flexible shared transport service to users who specify their desired location and time of pick-up and drop-off : there is no set route and no set timetable. It can complement fixed route public transport services and improve mobility in low-density areas and at low-demand times of day, typically using smaller vehicles.

While many DRT services are implemented primarily to improve social inclusivity and access to services, they can also contribute to decarbonisation by replacing private car journeys and facilitating multi-modal travel such as linking users to a train station or fixed route bus service.. Indeed, it is important that DRT services are integrated into the local transport network to be effective.

To reduce CO₂ emissions per passenger kilometre, DRT operators can optimise routes using the latest technology, select vehicles with lower or zero tailpipe emissions and increase passenger occupancy levels. Dynamic DRT [D-DRT] refers to schemes where routes are adjusted in real time to accommodate new pick-up requests, often made minutes in advance.



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Policy L7 : Sustainable Public Transport

In order for Peasmarsh to operate as a service village, improvements in the provision and use of public transport will be supported by :

- i) Advocating for improved sustainable public transport connectivity for the parish to include :
 - a) reliable, more frequent and integrated services allowing travel to larger service centres;
 - b) extended provision from early morning to later evening including weekends, at affordable fares in order to provide sustainable transport options for commuting, access to services [especially health] and social purposes;
 - c) consideration of patients needing to reach health service destinations;
- ii) Promoting integration of the local bus service with other bus services and the rail service at the Rye transport hub;
- iii) Seeking community transport solutions on a range of fronts including connections from Ore/Hastings and Hampden Park/Eastbourne stations to the respective hospitals;

All of the above will be undertaken in conjunction with RDC, ESCC, the respective councillors and the constituency Member of Parliament.

Conformity references : NPPF : 8c, 85, 104-106, 124c, 152; RDC : Core : RA1, CO4, TR2, TR3;

3.7 Conclusions

Protection and enhancement of the landscape, environment and heritage is to the benefit of all, whether resident or visitor. The Plan establishes policies to ensure that that happens beyond the protection afforded by national regulations :

- eight locally significant views are designated, giving them appropriate protection;
- protection is afforded to the habitats of the parish, particularly priority habitats;
- protection is afforded to all trees and woodland and the creation or extension of woodland habitat networks is encouraged;
- the biodiversity of the parish is protected even before proposed new net gain legislation becomes law and the possibility of the parish being a net gain host is raised;
- seven green spaces are designated, giving them appropriate protection;
- protection is afforded to green infrastructure, both within and outside of future developments;
- the need for sustainable, reliable, more frequent and integrated public transport service(s) in the context of a rural parish within the AONB is addressed;



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4 Infrastructure

Reminder : each map is a link to a larger map : click anywhere on the image to see it.

4.1 Introduction

Several aspects of Peasmarsh parish's infrastructure were identified as key concerns for stakeholders during the public consultations.

Needs were identified for improved roads / traffic, drainage [both foul and surface water], electricity supply and telecommunications in particular.

Accordingly, the detailed objectives of the Plan with respect to infrastructure are :

- calm and safe roads and traffic in the parish for all users whether vehicles, cycles or pedestrians;
- a secure supply of clean water;
- an effective and reliable sewer network with adequate capacity for sewage disposal;
- surface water drainage compatible with requirements and topography;
- a more reliable electricity supply with redundancy;
- telecommunications commensurate with modern technology throughout the parish;
- easy access to health services;
- improved secondary education provision;

The NPPF, paragraph 20, divides infrastructure into physical infrastructure [including transport, telecommunications, security, water supply, wastewater, flood risk and the provision of energy] and community or social infrastructure [including health, education and cultural]. This distinction is used in this section of the Plan.

4.2 Background

Rother designated Peasmarsh as a Local Service Village in its 2008 Rural Settlements Study¹². In the study, the definition of a Local Service Village is one having a “*range of local shops, services and social infrastructure*”. The criterion for selecting such villages is that they have a “*minimum of 10 of the 18 identified service level indicator services, and include a primary school*”.

There are actually only 15 identified services listed in the study as shown in Table 4.1 :

Convenience shopping ✓	Primary school ✓	Secondary school ✗
Doctors Surgery ✗	Dentist ✗	Chemist ✓
Post Office ✓	Public House ✓	Community Hall ✓
Play Area ✓	Sports Pitch ✓	Place of Worship ✓
Library ✗	Nursery School ✓	Petrol Filling Station ✓

Source : RDC

Table 4.1 : RDC Criteria for Local Service Village Designation

¹² https://www.rother.gov.uk/wp-content/uploads/2020/01/Part_1_Rural_Settlement_Strategy.pdf [large pdf file]



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The table identifies the ten services [and primary school] which are present in Peasmarsh. The issue is that, of the ten services, four of them are supplied by Jempson's on its campus so there is no "*range of local shops, services ...*" and the risk is that, should Jempson's close some or all of its operations, there is likely to be a significant reduction in available services.

Rother has some policies on infrastructure although much of the material relates to water supply which is an issue beyond the scope of this Plan.

For foul water disposal, in the RDC Core Strategy section on sustainable resource management, paragraph 13.28 states :

Foul sewerage should be by connection to the public mains system. Only exceptionally will other provision be allowed, where it is not feasible to connect.

The associated policy, SRM2, requires that the relevant companies 'are aware of and have capacity to meet demands for water, wastewater and sewerage arising from new development'.

For surface water disposal, the same paragraph 13.28 states :

The rate of run-off from developments needs to be carefully controlled to avoid any adverse impacts on watercourses and increasing the risk of flooding downstream. It must not prejudice the integrity of floodplains or flood defences.

Policy SRM2 requires 'the promotion of sustainable drainage systems to control the quantity and rate of run-off as well as to improve water quality wherever practicable'.

For broadband provision, in the RDC Core Strategy section on the rural economy, paragraph 12.28 notes :

Encouragement and support of home-working will also help support viable rural economies and is increasingly feasible, particularly within the several villages that enjoy relatively fast broadband including most of the identified service villages.

However, the footnote to that paragraph states that broadband speeds in excess of 5 Mbps are the highest of 4 speed categories defined by ESCC. Clearly technological advancement has overtaken the Core Strategy : broadband speeds of 30 Mbps are the expected minimum in 2022/23 although the government has set a minimum of 10 Mbps below which every household is entitled to an upgrade worth up to £3400.

Elsewhere in the Core Strategy, policy SRM1 on moving to a low carbon future supports sustainable travel patterns ... 'through widespread fast broadband coverage'.

For power supply, RDC seems totally silent on power supply even though a secure, reliable power supply is critical to business and WFH and important to other stakeholders.

Appendix A4 is a short analysis of the main issues with respect to infrastructure.

4.3 Physical Infrastructure

4.3.1 General

Peasmarsh is very much in need of infrastructure improvements, particularly in connection with both foul and surface water drainage, electricity supply and telecommunications.



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Local policy should always be to encourage the maintenance and improvement of existing infrastructure. An issue which exists in the parish is the lack of a central record of infrastructure problems.

In order to ensure that PPC is aware of any problems that arise with infrastructure and can feed back to suppliers and planning authorities collective knowledge of such issues, it is important that there is an easy to use central point for the collection of information to monitor infrastructure issues in the parish. This will be created when Project 4 in Section 10 is implemented.

Gas supply and waste management have not required any significant investigation in connection with this Plan, since no local issues have been raised in respect of them and, in any case, gas is expected to be phased out over the course of this Plan.

4.3.2 Roads and Traffic

The issue of traffic is of major importance to the local community. While the Plan is primarily about land use, the topic remains one that the community sees as a top priority to be addressed.

The great majority of traffic in Peasmarsh village goes on the A268, all other streets being minor roads or dead ends. The exception is the considerable traffic flow to Jempson's which is a supermarket campus of regional importance. That uses a small stretch of Tanhouse Lane to reach the campus from the A268.

Traffic speed, noise and intensity on the A268 can make walking and cycling in Peasmarsh an unsafe and unpleasant experience. That goes directly against the Plan vision which supports the maintenance and improvement of health and wellbeing.

The parish is fortunate to have volunteers who, by using a sophisticated Black Cat device, have managed to uncover considerable information on village traffic. A short report on the results of the work is available in Appendix 3 to this Plan.

Figure 4.1 [over] is an extract from the report. It shows traffic flows against speed, both west-bound and east-bound, at a monitoring point 200 metres inside the 30 mph zone for a recent one week monitoring period. Based upon the survey data 69% of vehicles are travelling above 30mph and a significant number are travelling at more than 45mph.

There are significant seasonal differences in traffic volume : ~15,500 vehicles/month were recorded in January 2022 and over 24,000 in July, a 58% increase. This reflects the importance of the tourism sector to the area.

Pavements for pedestrian use in the parish are limited to Main Street [the A268] and part – but not all – of School Lane. The parental perception is that the route to school is too dangerous for local children to walk so they choose to drive. This adds to the volume of traffic on School Lane which has to accommodate teachers parking their cars and the cars used to drop off the many children coming from outside village.

Policy I1 is on the page following Figure 4.1.

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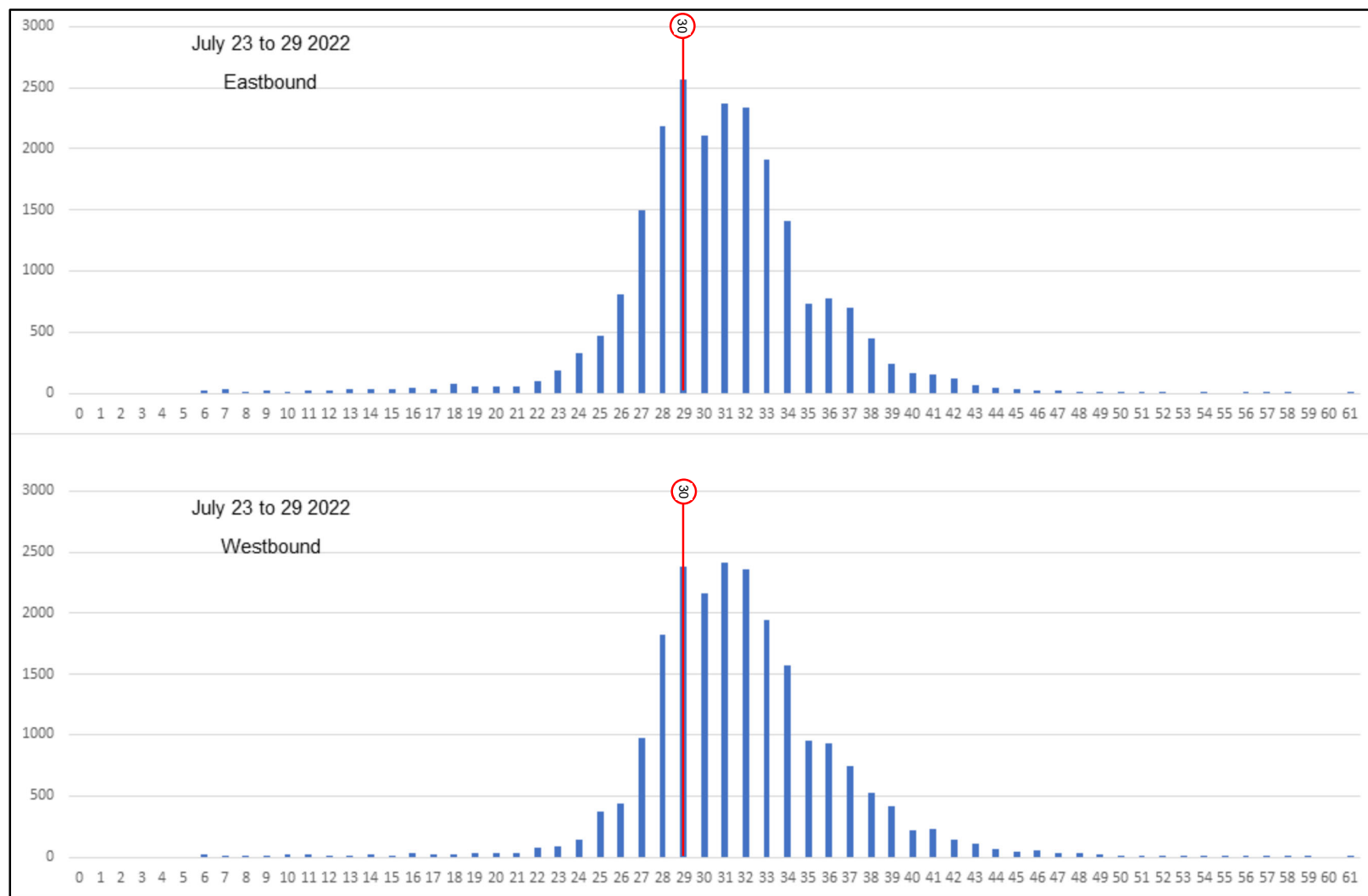


Figure 4.1 : Old Post Office Traffic Flow against Speed



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Policy I1 : Improving Road Safety and Traffic Impact

Improvements in safety and reductions in the speed of traffic through the village will be supported by :

- i) Working with police, volunteers and ESCC in order to continue to reduce the speed of traffic through the village;
- ii) Ensuring that development proposals demonstrate how highway safety is secured and, where necessary, enhanced;
- iii) Promoting the installation of measures to slow traffic through the village, using design features in keeping with the rural nature of the parish;
- iv) Mitigating the negative impacts on non-motorised transport users including improvements to pedestrian footpaths and cycle ways;

Conformity references : NPPF : 92, 104, 105, 106d, 108; RDC : Core : CO6, TR3;

Whilst the first criterion is not obviously a land-use policy it does directly support the attractiveness of the parish for business and residence.

The creation of safe traffic-free routes within the village is discussed in Section 3.6.3.

4.3.3 Clean Water Supply

Peasmarsh household water is supplied by South East Water [SE Water]. No issues in respect of water supply have been raised in any public consultation.

Significantly, a number of groundwater sources are located within Rother and are important sources of rural water but general water supply within the district is predominantly provided by a number of strategically important reservoirs which also supply water to the Hastings area namely Bewl, Powdermill and Darwell reservoirs.

There have been, in the past, significant failures in the mains water supply following on from electricity outages. SE Water should be required to ensure backup power supplies are readily available in these eventualities – see Policy I6 below.

During such failures SE Water have offered bottled water to residents but only at a depot in Battle – a 21 km [13 mile] drive away. The company should be required to place a bottled water depot in every village affected during a supply failure.

4.3.4 Foul Water Disposal

Southern Water [SW] is the wastewater service provider for those in the parish connected to the sewer system. The village no longer has a wastewater treatment facility, foul water is now pumped to the wastewater treatment works [WTW] in the parish of Iden. SW's draft Drainage and Wastewater Management Plan for the Rother Catchment¹³ states [Table 1 on page 6] that the Iden WTW serves the communities of : *'Rye, Iden, Peasmarsh, Playden, Camber, Peasmarsh [sic], Rye Foreign'*. The same table shows that the Rye WTW also serves Peasmarsh but there is no known connection from Peasmarsh to that WTW.

¹³ <https://www.southernwater.co.uk/media/3875/rother-dwmp-strategic-context.pdf>

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The Peasmarsh wastewater pumping station [WPS] is on the site of the old Peasmarsh treatment plant.

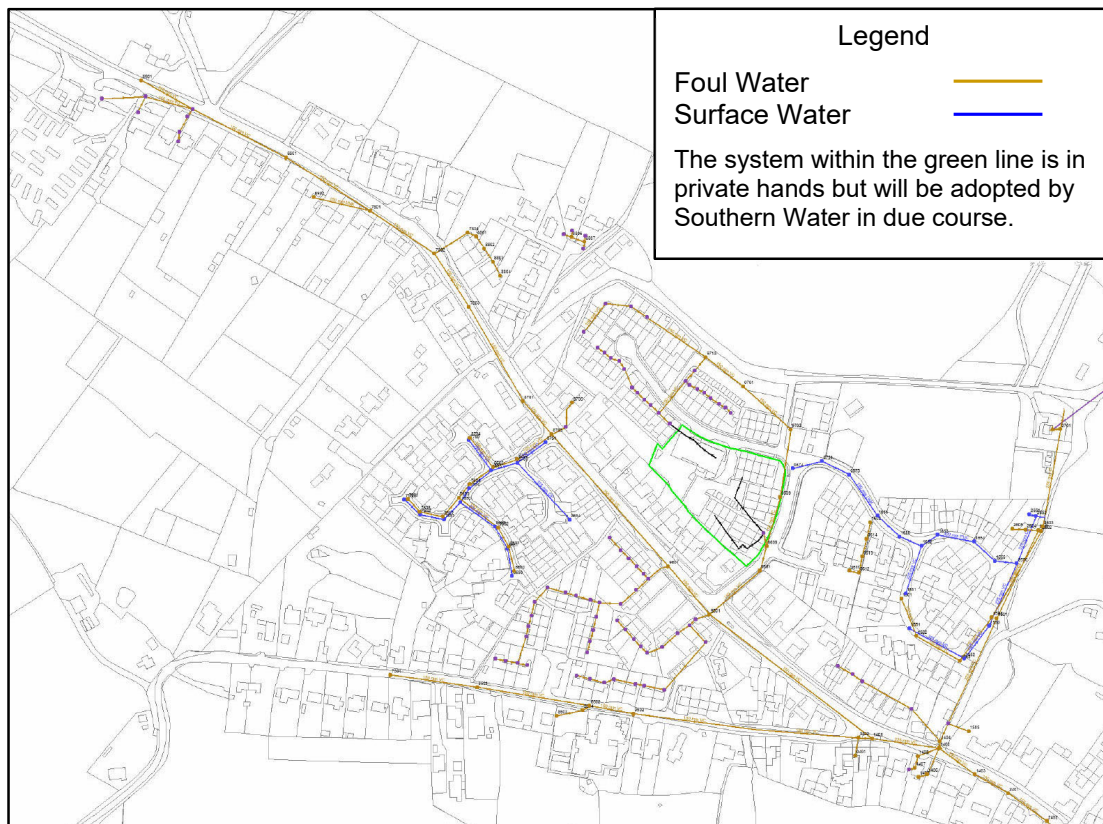
There are two primary issues in respect of foul water disposal and a third important one :

- the limited sewer network;
- the capacity of the system;
- the power supply to the pumping station;

Limited Network

The map in Figure 4.2 shows the main extent of the sewer network in Peasmarsh village together with the surface water drains under SW ownership. The company states that it doesn't know all of the details of its network which is why there are some parts of the system shown as not connected to network or the the pumping station.

SW states that its maps show the public sewer line networks, not private sewers (that typically lie within property boundaries for example). The public sewerage system is also more extensive than shown on the maps due to the transfer of a large number of formerly private sewers into public ownership in 2011.



Source : Southern Water from DigDat

Figure 4.2 : Map of SW Drainage Network in Central Peasmarsh Village



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The map shows that whilst most of the eastern end of the village has the possibility of a sewer connection, the western end is not well served : the sewer does not even reach all of built-up School Lane and stops at the top of Cock Hill on Main Street. As discussed in Section 4.2, this is contrary to Rother's Core Strategy, paragraph 13.28.

In its response to the Regulation 14 draft Plan, SW stated that the sewer on Main Street extends '*past the caravan site and properties close to the junction of Tanhouse Lane and on Main Street*' but offered no explanation as to why that is not shown on the map. It also stated that the foul water sewer was '*just 10 metres from the southern edge of the PM02 development boundary*'. PM02 is the allocated site called Woodside and is also close to the junction of Tanhouse Lane and on Main Street. As the junction of Tanhouse Lane and Main Street is some 10 metres below the end of the sewer shown on the map there must also be a WPS/FPS at the bottom of the hill but that is not shown on the map either.

SW acknowledges that it has a statutory obligation to serve new development and states that when reviewing planning applications it takes account of the performance of the public sewer network and identifies where reinforcement of the system may be required to ensure that there is no reduction in the level of service as a consequence of growth. It further states that '*developers typically pay a standard connection fee*'.

However, its standard tariff document makes it clear that Site Specific charges [payable by the developer] includes the cost of '*any new pipework or pumping facilities that are needed to connect the new houses to the nearest practical point on the existing network*'. Whilst that might be appropriate where a sewer network is extensive, it is not reasonable that a development should bear the cost of extending the main to the vicinity of the development when the main is stopped to avoid dealing with difficult terrain or to save costs. The costs of such major infrastructure work will make sites less attractive to develop.

Capacity

The fundamental problem with the sewer system capacity is that SW bases all its assessments on the system being for foul water only even though it knows that there are older homes [there is no known data on how many that might be] with combined systems [foul and surface water] legitimately connected to the sewers. [It states that an overflow exists at the pumping station '*to relieve high flows arising at times of rainfall*'.]

One result of that incorrect assumption is that the pumping station recorded overflow spills to the local stream 38 times for a total of 193 hours during 2021 alone¹⁴. The actual number of pollution incidents and total number of hours will be greater than that reported because when the foul water sewer network overflows the foul water enters the surface water system and is discharged directly to the river catchment area. Appendix 3 notes three known such incidents in the recent past.

The company states that it is identifying the improvements required to sewerage systems in accordance with DEFRA guidance, noting that, at present, there is no limit on the number of times the overflow is permitted to operate. Whilst that might be correct it should not be used as an excuse to continue polluting the local stream and hence the River Rother which flows out to sea through the internationally recognised Dungeness, Romney Marsh and Rye Bay Ramsar site which is also a designated SSSI and SPA as shown in Figure 3.2 [qv].

¹⁴ <https://www.southernwater.co.uk/media/6607/southern-water-spill-data-summary-2021.xlsx>



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Even if the system were purely foul water there are still unanswered questions with respect to system capacity.

Some people experience sewage flooding in their gardens at not-infrequent intervals and instances of internal flooding occur from time to time. In an email of Jul 21 2022, having been asked whether the sewer diameter was correct, SW stated : *'We can't answer that question for you directly as capacity checks involve modelling.'* The company didn't explain why it couldn't undertake such calculations.

In Appendix 3 there is an informal but supported assessment of the sewer capacity. Whilst it is not definitive it does raise a basic question as to whether the diameter of the pipe is adequate.

A number of local incidents have been reported to SW but it maintains that these are caused by other issues outside of its control. This is a critical matter, fundamental to any new developments and must be resolved before further development is undertaken.

Risk based catchment screening is a process completed at the outset of developing a Drainage and Wastewater Management Plan. SW states that the screening is used to identify the sewer catchments likely to be most vulnerable to future changes, such as climate change or new development, so effort can be focused accordingly. However, as seen below, the screening also identifies current issues.

SW's 2020 Baseline Risk and Vulnerability Assessment tabulates the risks for the Rother catchment. Iden WTW is reported to have a population of 1,883 connected to its system but it is unclear whether that is the actual population or a population equivalent value which is a technical assessment of capacity.

Most risks were assessed as 'not significant' : sewer flooding and collapse, compliance failure, good ecological status, surface water management and groundwater pollution. However, the following risks were all assessed as 'very significant' :

Risk :	Pollution	Storm Overflow		Nutrient Neutrality	
Year :	2020	2020	2050	2020	2050
Reason :	operational	hydraulic	hydraulic	unknown	quality

At the end of the table, SW states that it has a low level of concern but accepts that its investment strategy must be to improve the Iden system [of which Peasmarsh is part]. However, the company's draft Drainage and Wastewater Management Plan, including the five associated investment plans, makes no mention of Iden or Peasmarsh.

Pumping Station and WTW Power Supply

As discussed in Section 4.3.6 below, the parish power supply is not secure and, despite being a critical element of the infrastructure, the pumping station does not have its own standby generator.

Policy I2, requiring improvement of the sewage system is on the next page.



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Policy I2 : Sewage System Improvement

Development proposals which have undergone an independent capacity check of the parish sewer system by a qualified professional will be supported provided that any improvements required are operational before construction is commenced. This is essential due to the current identified problems of regular foul water overflow and pollution incidents in the Neighbourhood Area.

Advocate improvements in the system by promoting, in conjunction with RDC, ESCC, the respective councillors and the constituency Member of Parliament, the extension of the local network to include all of the village and a secure power supply for the wastewater pumping station.

Conformity references : NPPF : 11a, 28, 29, 130a, 177c; RDC : Core : OSS3, SRM2; HWMP : G1; ESCC Flood Risk Strategy;

4.3.5 Surface Water Drainage

Surface water is the runoff from houses, gardens and fields which is not used for other purposes. There is no single organisation with direct responsibility for surface water drainage. Indeed, it was a surprise to stakeholders that SW has some surface water responsibility in the village as shown in Figure 4.2. Split responsibility makes it more difficult to deal with issues that arise.

Most of the parish is classified as being in Flood Zone 1 [1:1000 annual probability of flooding or better] with very little in Flood Zone 2 [no worse than 1:100 annual probability] and relatively small amounts – on the banks of the Rother and the Tillingham – in Flood Zone 3 [greater than 1:100 annual probability].

The problem in the parish is not river flooding [an Environment Agency issue] however, it is from localised surface water flooding, primarily because of the clay base layer which means that water courses must carry away surface water.

Surface water, groundwater and ordinary watercourse flood risk in East Sussex is managed by ESCC in its role as the Lead Local Flood Authority. The responsible team produces and maintains a flood risk strategy and records all incidents reported to it. Problems of flooding and drain maintenance for roads and culverts is dealt with by the ESCC highways maintenance team.

On private land, responsibility for the management and prevention of flooding falls on landowners, farmers, local authorities, drainage boards and developers, depending on the particular circumstances. For watercourses such as streams and rivers, ownership is normally split between landowners on either bank, typically meeting in the middle.

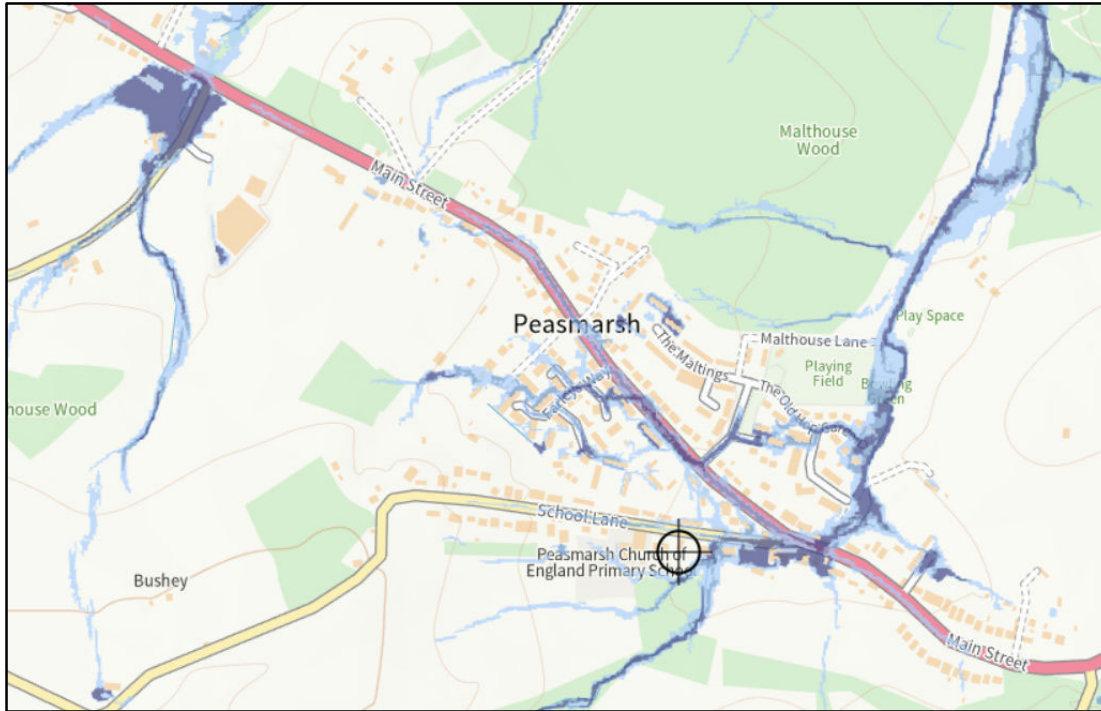
As a result of the multitude of responsibilities above, ESCC observes that much information is not readily available, has been lost in preceding years or has yet to be developed and historical records may be needed to identify old springs and similar.

A guide to some of the organisations involved is on p7 of the ESCC Flood Risk Management Strategy¹⁵ which also has a guide to water ownership on p32.

¹⁵ <https://www.eastsussex.gov.uk/environment/flooding/local-flood-risk-management-strategy>

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The particular problem for Peasmarsh village is that the A268 cuts the natural flow of surface water in its northward path to the River Rother. There are only two known culverts connecting the south side with the north and both seem to have inadequate capacity or be ill-maintained as evidenced by the flooding records shown in the map on Figure 4.3 which is a screenshot from the government's online surface water flooding map :



Source : HM Government [<https://check-long-term-flood-risk.service.gov.uk/postcode>]

Figure 4.3 : Map of Surface Water Flooding [darker colours = more flooding]

It can be seen that in some places the A268 acts as an *ad hoc* water course.

In terms of future developments it is important that all such developments – no matter of what size – must ensure that surface water drainage will not add to existing site runoff or cause any adverse impact to neighbouring properties and the surrounding environment. That is achieved by installing sustainable drainage systems [SuDS].

Policy I3 : Surface Water Drainage

All developments, no matter of what size, must adopt sustainable drainage systems in accordance with Design Code 3.3 in Addendum D6 : Peasmarsh Villagescape and Design Codes.

Planning applications must be accompanied by a SuDS statement demonstrating how this is to be achieved.

Developments which do not comply with this policy will not be supported.

Conformity references : NPPF : 11a, 28, 29, 120b, 124, 127, 128, 130a, 154, 159, 161-165, 167, 177c; RDC : Core : OSS3, SRM2, EN7; DaSA : DRM1; HWMP : G1; ESCC Flood Risk Strategy;

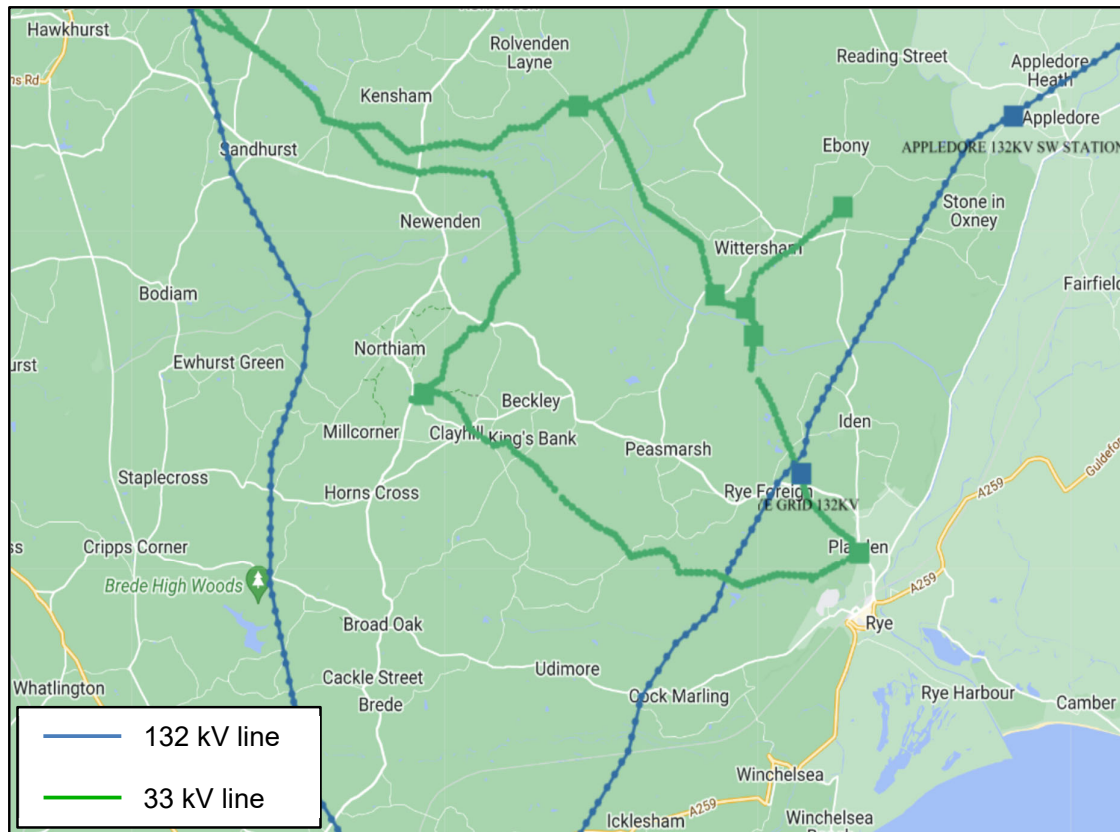
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4.3.6 Electricity Supply

Although electricity is sold by retail companies, responsibility for providing power to the parish lies with UK Power Networks [UKPN]. UKPN acknowledges that, in common with many rural areas, Peasmarsh experiences frequent supply disruptions and outages largely due to the lack of a ring network because of the expense of maintaining one.

Despite UKPN's formal plans for network resilience, most if not all customers in Peasmarsh are on single line 'T' networks rather than on secure ring networks.. A single point of failure on a single line system can prevent supply further on. Clearly, any failure on such a line close to its junction with the main network, will affect many premises.

The map in Figure 4.4 shows the main high voltage [HV] networks in the area of the village. Note that Peasmarsh is not supplied from either the 132kV or the 33kV networks, it is, at best, supplied from 11 kV lines :



Source : UKPN DG Mapping Tool

Figure 4.4 : Map of HV Network in Peasmarsh Area

The process of monitoring performance is driven by OFGEM regulations, requiring the recording of any customer interruptions and minutes of supply lost, although these records are not available to the public.

All faults in the area are recorded and investigated by a planning team. This feeds into a local plan to improve and repair the local network. This team also monitors load growth in the area which becomes part of a five-year plan for technical infrastructure.



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In the future, adequate capacity will need to be available not only for additional housing but for the charging of electric vehicles and the installation of greener heating systems. UKPN maintains that this growth is anticipated and catered for within its plans.

A critical issue, outside the control of this Plan, is that UKPN are not in a position to install any new links at present. There is a large backlog of required work and any significant increase in capacity could not be undertaken before 2030. A general shortage of network capacity and engineers is also going to limit any expansion for some time.

This planning mechanism regards developments of up to 10 dwellings as part of the general contingency provision but capacity for larger developments has to be funded by the developers, as does the actual supply to a development site. However, with effect from April 2023, development costs are to be paid by a levy on all customers. Substation upgrades will then not be chargeable to developers.

An important feature of the power supply to the Parish, is that there is not only a lack of redundancy in respect of general consumer supply to the area, but there is also no redundancy in respect of supply to key infrastructure installations, such as telephone / broadband exchanges, telecommunications masts and fresh water / sewage pumping stations. The knock-on effect of this greatly exacerbates and magnifies the consequences of any power failure.

These key installations should have secure supplies in the same way as expected of say hospitals with automatic switching in of permanently installed, reliable standby generation with suitably sized fuel storage.

Policy I4 : Power Supply

The issue of intermittent outages of the power supply inhibits Peasmarsh operating as a service village and creates barriers to future investment. Improvements in the system will be supported by promoting, in conjunction with RDC, ESCC, the respective councillors and the constituency Member of Parliament, improvements to the local reticulation to substantially improve the reliability of supply.

Conformity references : NPPF : 11a, 28, 29, 114, 130a; RDC : Core : SRM1;

These issues are critical to the parish as, without reliable power and reliable key infrastructure, it will not be possible to attract new businesses to the parish.

4.3.7 Telecommunications

Cell phones and the internet have revolutionised the way that many live their lives, enabling new ways of working and communication, fostering online communities, fuelling economic growth and facilitating new business and entertainment.

Peasmarsh is not well supplied with coverage for either : applications for new residential development should demonstrate how the development will provide the ability for occupiers to be able to connect to superfast broadband and mobile communication.



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Cell Phones

Although OFCOM reports that all four physical networks have 'OK Coverage' outdoors, stakeholders report poor reception in many locations in the parish. Indoor coverage is much poorer with only a 'good' or 'OK' service in the village itself and even that depends on which network is being used. Service away from the village varies from 'Some Problems' to 'No Coverage' and again depends on which network is being used.

An important issue is the power supply to the local cell towers which, as with domestic supply, experiences frequent disruption. The cells do not seem to have generators so any lengthy disruption exhausts the batteries in the uninterruptible power supplies and the cells close down. That typically means that many stakeholders have no telecommunications at all during extended outages as the telephone system is already being digitised.

Broadband

It is claimed that East Sussex has one of the highest levels of access to superfast broadband¹⁶ in the UK with over 97% of the county already able to access Superfast services and plans in place to reach as near to 100% of the county as possible. There are however significant outlying areas in Peasmarsh parish unable to access these services and performance for those who can leaves something to be desired, perhaps due to the way that the upgrade was implemented.

Policy I5 : Telecommunications

The limited nature of telecommunication facilities inhibits Peasmarsh operating as a service village and creates barriers to future investment. Improvements in the system will be supported by promoting, in conjunction with RDC, ESCC, the respective councillors and the constituency Member of Parliament, improvements to the local broadband and cell phone services, particularly in the parts of the parish not in the village.

Proposals that deliver improvements to telecommunications with additional equipment locations will be supported where :

- i) the applicant has fully explored the opportunities to erect apparatus on existing buildings, masts or other structures;
- ii) the number of radio and telecommunication masts are kept to a minimum consistent with the efficient operation of the network;
- iii) the development has been sited and designed to minimize the impact on the character and appearance of Peasmarsh and the AONB;

Conformity references : NPPF : 11a, 28, 29, 81-83, 114-118; RDC : Core : SRM1;

¹⁶ 'superfast broadband' is fibre to the cabinet and copper from there to the premises and typically offers at least 30 Mbps speeds



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4.3.8 Developer Obligations

New developments impose additional loads on utilities and sometimes roads, often beyond the simple matter of connecting to the existing network. It is the responsibility of the developer to ensure that this is completed in an efficient and competent manner.

Policy I6 : Developer Obligations

Where there is a capacity constraint in respect of any utility provision, developers must set out what changes and improvements are required and how they are to be delivered. This should be made public, included as a condition of planning approval and implemented prior to the commencement of the development.

Conformity references : NPPF : 28, 29, 32, 34, 130a; RDC : Core : SRM1;

4.4 Social Infrastructure

4.4.1 Health Services

As discussed in Appendix 3, the parish is supported by a full range of health services. Compared to other East Sussex Health Trust [ESHT] areas, and to national averages, the parish is well provided for and has a range of choices. Yet, due to the lack of transport options, the public consultation revealed that nearly a third of village respondents felt there was a shortage of NHS provision locally.

The NHS will not even consider a local GP surgery without a potential patient base of 8,000 and it prefers to see 10,000. It is therefore extremely unlikely that any local facility would be funded by the NHS in the village [and that is not just the capital cost, it is the operating cost too].

Peasmarsh has a range of health services, including 3 doctors' surgeries, within a 5 mile radius, and a pharmacy within the village plus 2 others in Rye. ESHT has major hospitals in Hastings and Eastbourne plus a smaller facility in Bexhill. There is also a community hospital in Rye which is owned and operated by a charitable community trust and therefore outside of the NHS. However, it works with the NHS which offers intermediate care, palliative care and some day care services from it.

There is a care home in the parish and a new 60 bed facility is being built on the outskirts of Rye. Over 40 other care homes are available in Broad Oak, Rye, Hastings and Bexhill.

Planning and development should enable and support healthy lifestyles, targeting identified local health and well-being needs. The key to resolving these issues lies in the provision of suitable sustainable transport for people unable to make their own way to the NHS provisions available and particularly in improving the public transport connections between the parish and the outside world. This is addressed in Section 3.6.4 of the Plan.

4.4.2 Education

Education is recognised as a basic human right by the United Nations and good educational facilities are a fundamental requirement of civilisation.

Access to schools, where walking or cycling is not feasible, via public transport should be available by suitable bus services and community transport schemes.



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The government indices of deprivation reveal that area Rother 002D – Peasmarsh plus part of Rye Foreign – is only in the 3rd decile [20 to 30%] of the Education, Skills and Training index, well below average.

Pre-School

The pre-school in Peasmarsh operates from purpose-built facilities in the grounds of the primary school and accepts children from the age of two onwards. Although co-located with the primary school, the pre-school operates quite separately from it as a charitable trust. Most of the children come from Peasmarsh or Rye.

The school is registered with the necessary authorities to offer the free early education / childcare available to all 3 and 4 year olds plus the additional support available in certain circumstances.

Primary School

Peasmarsh Church of England Primary School operates on the site of the original parish school in School Lane. That was founded in 1841 and the original building is still in use as part of a much larger complex. The school is rated as 'Good' by OFSTED.

The diocese gifted some glebe land to the school in 2015 so it is able to offer a forest school experience to all pupils, something which is also available to children at the pre-school.

There are seven year groups at the school, each with a Published Admission Number [PAN] of 15 children so a total of 105 children. The PAN is, in theory, the maximum number of pupils that the education authority will admit to that year group. However, the school has an obligation to accept children who live in the area so in some year groups the number of children already exceeds PAN.

Should the expansion of the school become necessary due to demand, this would be supported by the Plan.

The school is on the southern edge of the village so not necessarily within easy walking distance of all pupils [some of whom come from outside the parish in any case] and for some who are within walking distance the routes are far from safe because School Lane is narrow and doesn't have a pavement throughout its length.

This gives rise to a congestion issue at the start and end of the school day, made worse by the teachers not having anywhere to park except on the road.

Secondary School

ESCC operates two secondary schools in the region of Peasmarsh : Rye College [about 5 km / 3 miles from the village] and Robertsbridge Community College [about 19 km / 12 miles along country lanes]. Neither is particularly well perceived and neither has a sixth form. The nearest East Sussex sixth forms are in Hastings and Bexhill.

There is also a secondary school in Tenterden across in Kent [about 13 km / 8 miles, again on country lanes] and that does have a sixth form plus a grammar stream. The school seems to be the preferred option for most Peasmarsh parents when selecting secondary education for their children.

Travel to secondary school is therefore an important issue for the parish.



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Policy I7 : Access to High Quality Secondary Education

Improvements to secondary education will be supported by lobbying for sustained improvements to the closest ESCC schools, including the provision of sixth form facilities at one or other.

Conformity references : NPPF : 95; RDC : Core : RA1, CO4, EC1;

4.5 Conclusions

Good quality infrastructure throughout the parish is essential for a high quality of life and well-being. Without it Peasmarsh could not and does not correctly function as a local service village. The Plan sets out a series of policies to support improvements to the existing, in some cases decidedly less than adequate, infrastructure whether physical or social. Without good, reliable infrastructure the parish will not be able to attract new business or develop new homes.

The policies encompass a broad range which includes roads, water supply, drainage of both foul and surface water, electricity, telecommunications and education. There is also a project to establish a parish wide reporting system for infrastructure issues which will allow PPC to demonstrate the nature of the issues which arise.



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5 Business and the Local Economy

5.1 Introduction

The economy of Peasmarsh today is primarily driven by some agriculture with tourism and retail featuring strongly. There is a wide range of businesses based in Peasmarsh parish, many very small and home based, often within the service sector.

All of the retail activity is in one business : Jempson's, which operates a campus and serves a wide region, not just the parish. Although currently not an issue, having all of the sector vested in one company is a high risk, particularly over the 18 year life of the Plan.

However, consultations have shown four fifths of stakeholders see Peasmarsh as a dormitory area rather than an economic centre in its own right and the overall view is that the parish should stay as it is.

Businesses were asked to respond to a Business Questionnaire and were also spoken to directly. There was widespread concern that the cost of housing, both in the parish itself and in the wider Rye area, meant that people working in Peasmarsh were unable to afford a home – whether owned or privately rented – so many were commuting from Hastings or other more affordable areas.

Most businesses did not foresee needing additional space in the near future but felt it important to retain existing commercial space. They also highlighted the need for a more imaginative approach to the conversion of farm buildings for wider commercial usage and not just as additional housing/holiday lets, although there is a role for both.

Accordingly, the detailed objectives of the Plan with respect to Business and the Local Economy are :

- to support the creation and retention of small scale business;
- to encourage the provision of services and infrastructure that enable business development and sustainability;
- to support the traditional farming community;

5.2 Background

The 2011 census showed that two thirds of working residents were in full time employment at that time with the remainder in part-time employment. The largest employers in the parish are retail, hospitality and care.

At the time of that census, most people living in Peasmarsh worked in the skilled trades, selling [wholesale and retail], professional and education or health sectors. This is shown graphically in Figure 5.1 [over].

Only 3.9% of the working population worked in agriculture at that time.

The parish has a very high rate of self-employed people [17.9%] compared with the average across England [9.7%] and over a quarter of residents work in the public sector.

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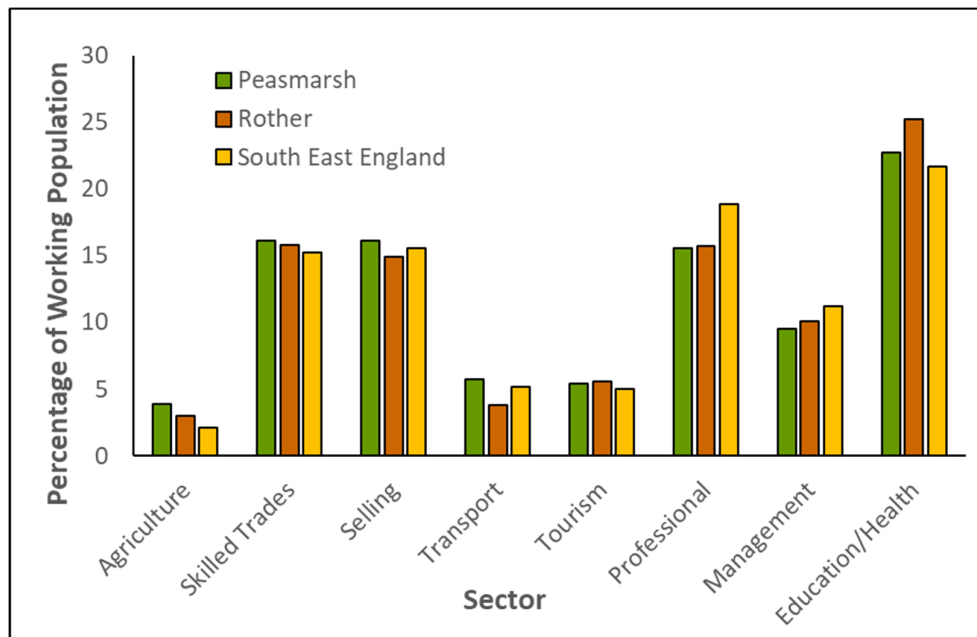


Figure 5.1 : Employment Sectors for Peasmarsh Workers

The census also showed that half of the working population worked at home or within 10km [just over 6m] from home. 14% travelled more than 30km [18.4m] to work :

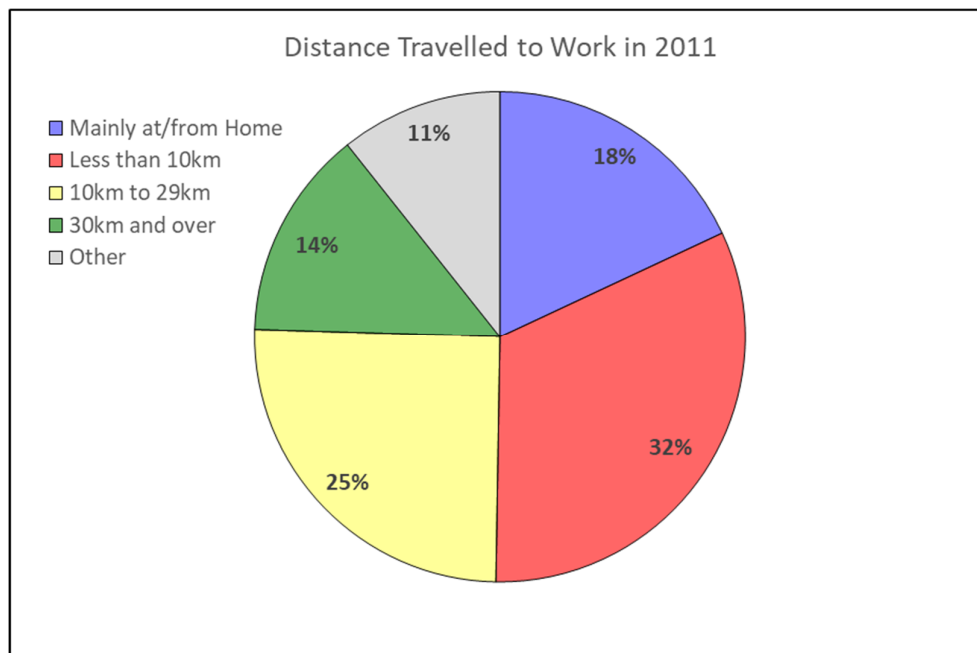


Figure 5.2 : Distance Travelled to Work from Peasmarsh

The vast majority of people [76%] used a private vehicle to travel to work, only 5.7% used public transport while 8.5% walked or cycled to work.



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Working from home has been stimulated by the pandemic and is likely to continue to grow in coming years. Without improved mobile phone reception and broadband and a reliable power supply the parish is unlikely to attract new business, including development of the tourist sector. It would also benefit from a suitable business hub although a market study would be needed to confirm that.

Equally, new business space for those working from home could be supported through allowing proportionate extensions to an existing building.

Peasmarsh is a rural community that historically grew around farmsteads but changes in farming have been rapid in the last decades. Today's moves towards a more environmental focus to agriculture will mean that farmers will continue to face challenges and will continue to look for areas of diversification to keep farms viable.

The character of the parish is largely the result of how the land has been shaped by farmers, land managers and skilled craftsmen and women over centuries. A vibrant rural economy and confident rural businesses are vital to the future of the area. Rural businesses will be important partners in delivering the aspirations of the Plan.

Land based enterprises are key to the economic prosperity of the village. Historically they have been focused on the mixed farming of family farms and smallholdings, woodland management and rural crafts. Up to the 1980's the village supported a wide range of local businesses including Estate Fencing, Farley's garage, butchers, a post office, tea rooms, and shops. These provided customers from the output of farms and woodlands.

New businesses opened in the rural area of the Parish include the Tillingham Winery [with rooms and restaurant] at what was Dew Farm, The Cherry Barn wedding venue at Clayton Farm and holiday cottages at both Old House Farm and New House Farm. There is also a training centre being developed at Old House Farm.

5.3 Supporting the Local Economy

5.3.1 General

This Plan supports the local economy of the parish, whether in the village or the truly rural areas, provided that any support measures comply with the rest of the policies in the Plan.

Proposals which change the use of a rural building or create proportionate new builds in order to support business or tourism use will be particularly important. However, not all classes of use would be appropriate, given the rural nature of the parish within the AONB. The following classes [with a precis of the wording in the order] are seen as appropriate :

- E (a) for the display / sale of goods, other than hot food;
- E (b) for the sale of food and drink for consumption mainly on the premises;
- E (c) for the provision of the following services :
 - (i) financial services,
 - (ii) professional services (other than health or medical services), or
 - (iii) any other services which it is appropriate to provide in a commercial, business or service locality,



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- E (g) for any the following provided that they can be carried out in any residential area without detriment to the amenity of that area :
- (i) an office to carry out any operational or administrative functions,
 - (ii) the research and development of products or processes, or
 - (iii) any industrial process,

Policy E1 : New Business Space Development

The development of new business space to improve the sustainability of business and provision of employment opportunities in the parish will be supported for use classes E (a), E (b), E (c) and E (g) as defined in the Town and Country Planning (Use Classes) Order 1987 as updated in September 2020.

Conformity references : NPPF : 81 - 85; RDC : Core : RA1, EC4; Local Plan : EM10; DaSA: DEC2;

Given the rural nature of the parish within the AONB, it is anticipated that new business space will be generated on existing 'brownfield' sites, particularly those related to the agricultural sector or will involve the adaptation of homes.

The recent trend towards working from home [WFH] has substantially changed the dynamics of parish life and that trend is considered to be a permanent feature during the Plan period. The Plan supports those wishing to work from home by adapting their existing home to suit.

Rother's policy DHG9 already sets out general policy on extensions, alterations and outbuildings. However, Peasmarsh is in the AONB and it might be appropriate for an outbuilding to be more than 20 metres from the dwelling so a specific policy is required.

Policy E2 : Adaptation of Existing Buildings for WFH

Development proposals for the conversion of properties for working from home will be supported.

Proposals to create work space that involve the use of part of a building, small-scale free-standing buildings within the curtilage of a building, extensions to a building, or the conversion of outbuildings will be supported provided that the rural character of the parish within an AONB is not disturbed and subject to the following criteria :

- all activities are undertaken predominantly by the occupants of the dwelling;
- additional buildings, extensions or conversions should not detract from the quality and character of the building to which they are subservient by reason of height, scale, massing, location or the facing materials used in their construction;
- any employment element does not adversely impact upon road safety or substantially increase traffic volume; and
- appropriate car parking is provided within the site;

Conformity references : NPPF : 81 - 85; RDC : Core: RA1, EC4; DaSA: DHG9;



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The intent of the policy is not to create substantial additional work space or jobs whilst, equally, not ruling out the possibility of an occupant employing a non-occupant.

5.3.2 Farming and the Rural Land-Based Economy

Understanding the needs of rural businesses, particularly small-scale enterprises, and enabling change which contributes to the landscape character and environment will be important. There have been significant changes to the economics and structure of farms and woodland which have reduced the number of people working in these sectors.

However, there have been changes to the diversity of land-based enterprises and these opportunities are likely to continue with public and private payments for restoring and creating habitats and continued diversification into new areas which might include adding value to food production and changing the use of farm building to create new enterprises such as :

- holiday accommodation
- wedding venues
- vineyards
- hospitality
- business space including co- working premises

As local businesses expand there may be a need for local staff accommodation. That reinforces the needs for truly affordable housing discussed in Section 6.

The Plan supports land-based businesses to develop resilient income streams including food, timber, ecosystem services, alternative uses of redundant farm buildings and tourism.

Rother has a policy in place, RA4, to ensure that traditional historic farm buildings will be retained in effective and appropriate use. It adopts a hierarchy of priorities for re-use :

- 1st remain in agricultural-related use;
- 2nd adapt to non-agricultural commercial use;
- 3rd only if the above are unsuitable, residential use 'may be considered acceptable';

and applies further criteria for proposals to use such buildings :

- demonstrate a sound and thorough understanding of the significance of the building and its setting;
- ensure retention of the character of the building and its surroundings;
- ensure proper protection of existing wildlife and habitats;

The policy is on the next page.



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Policy E3 : Rural Building Conversion for Business Use

Proposals for conversions of suitable redundant farm or other buildings for business uses will be supported, provided that :

- priority is given in accordance with RDC policy RA4;
- the proposals would have an acceptable effect upon the landscape of the AONB;
- the design approach is appropriate and sympathetic to the building and its surroundings;
- traffic, access, landscaping and general amenity considerations are satisfied;

Conformity references : NPPF : 81 - 85; RDC : Core: RA1, RA2, RA3, RA4, EC4; HWMP : LBE1;

5.3.3 Hospitality and Tourism

Thanks to tourism, hospitality in Peasmarsh is thriving with two hotels, the two village pubs and a growing number of holiday rentals. The latter, of course, is counter to the need for more housing in the parish.

The parish is within 1066 Country and is close to a number of attractions including the mediaeval town of Rye and its major nature reserve of Rye Harbour, Great Dixter house and gardens, Bodiam Castle and the Kent & East Sussex [steam] Railway. Slightly further afield are the internationally recognised Ramsar site named Dungeness, Romney Marsh and Rye Bay, the equally famous Romney, Hythe and Dymchurch light railway and the historic towns of Winchelsea and Battle [the assumed site of the Battle of Hastings].

The High Weald Landscape Trail runs through Peasmarsh village and the Sussex Border Path passes through the northern part of the parish. The northern parish boundary [also that of the district and county] is the River Rother where there are opportunities to further promote green tourism.

At its broadest definition, a tourism facility would be anything which encourages tourists to visit or stay in Peasmarsh. The Plan supports the hospitality and tourism sector and looks to small scale organic growth therein, not large scale developments such as new build hotels or larger developments.

Policy E4 : Promotion of Sustainable Tourism

Proposals that involve tourism facilities which respond to identified local needs and are of a scale and location in keeping with the rural character of the parish will be supported, provided that :

- existing attractions or accommodation are enhanced; or
 - the supply of quality serviced and self-catering accommodation is increased;
- and
- the proposal does not result in a reduction to the parish housing stock;

Conformity references : NPPF : 81 - 85; RDC : Core : RA2, RA3, EC6; Local Plan : EM10; DaSA : DEC2;



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5.4 Conclusions

Most stakeholders do not see Peasmarsh as an economic centre and the economy is hampered by a lack of affordable housing, inadequate telecommunication services and an unreliable power supply. The existing economy is mainly based on the agriculture, tourism and retail sectors although there are a lot of small businesses and employees that bring in income from outside.

Accordingly, the Plan seeks to support existing businesses, including the farms, and small scale, appropriate new business ventures in certain sectors and use classes.

The self-employed and those working from home are identified as particular groups deserving of support. Rural land-based business and tourism are also identified as particular sectors deserving of support.

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6 Housing

6.1 Introduction

Housing was identified as a key concern for stakeholders.

A need was identified for improved housing provision for those working locally, younger households and a smaller number of older people wishing to downsize whilst remaining living independently in the village. The latter point is also in line with Rother policy.

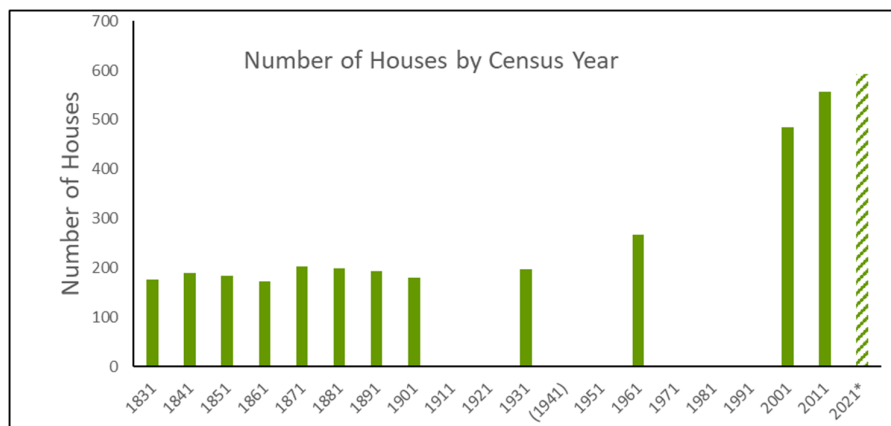
There was concern about the number of houses the parish was expected to accommodate and that developments approved in recent years had not provided affordable homes for local people. There was also concern that any further expansion would both damage the village's key characteristics and further overload the local infrastructure, which was also identified as a major concern. While some small scale development was acceptable to stakeholders, this had to be done sensitively and appropriately, not least due to the parish being situated within the High Weald AONB.

Accordingly, the detailed objectives of the Plan with respect to housing are :

- to ensure that the homes delivered meet the needs of and strengthen the community;
- to improve the range of housing stock by developing smaller properties to balance the age profile of those living in the parish;
- to enable people with a local connection to Peasmarsh to stay in or return to the village throughout their lifetime and as their needs change;
- to ensure affordable properties are allocated to people with a local connection, both now and in the future;

6.2 Background

The number of houses in Peasmarsh was relatively constant in the 19th and first half of the 20th centuries but it climbed thereafter, tripling since WWII. The Post Office states that in 2022 there are 592 properties in the parish.



Source : PNDP Group from various records

Figure 6.1 : House Numbers in Peasmarsh



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The 2014 Rother Local Plan Core Strategy¹⁷ accepted that, including the 4 new houses then being built on Tanyard Field, Peasmarsh had no outstanding allocation from the 2006 Local Plan.

The 2014 Core Strategy identified Peasmarsh as a rural service village and allocated a further 50 homes to be developed from 2011-2028.

Data from RDC, quoted in the Housing Need Assessment [HNA]¹⁸ undertaken by AECOM, states that 27 new homes were built since the 2011 Census, of which 16 were for market sale (including Tanyard Field) and 11 were for affordable rent. This means that historical development over the last 20 years has averaged 5 homes per year. The 2019 DaSA identified a new site, on the edge of the development boundary to the south of the A268, known locally as Pippins, as suitable for a further 45 homes to meet the 2028 target.

The NPPF defines windfall sites as “*Sites not specifically identified in the development plan*” and paragraphs 69 to 71 of the framework refer to them within a discussion on small and medium sized development sites. The 16 houses referred to above were all windfall sites.

Rother is in the early stages of preparing an emerging Local Plan to 2039. As yet no further figures have been identified although the village is still regarded as suitable for further development as it has been designated a local service village.

However, the parish’s position within an AONB requires that development is limited, sensitively located, and designed to minimise adverse impacts. These factors have therefore to be balanced in the site allocations.

As discussed in Section 4, whilst the local service village designation considers what services are available in the village it fails to consider other issues which impact on the village. Chief amongst these is the poor sewerage infrastructure.

6.3 Housing Issues

There is a range of issues with respect to housing in Peasmarsh.

6.3.1 Diversity

The age profile of the parish suggests that the population is getting older. A modest influx of younger people would be beneficial in terms of securing more diversity and sustainability for the community.

Local businesses have reported the difficulty that their workers have in finding affordable housing in Peasmarsh and/or the wider Rye area which impacts on the economic sustainability of local business.

6.3.2 Housing Type

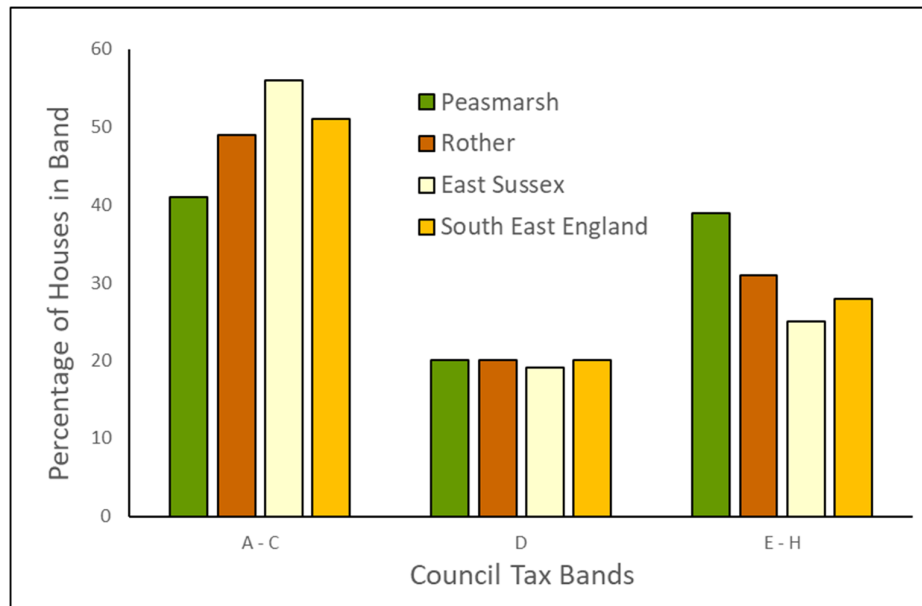
There is higher than average home ownership (67.5%) in the parish than in England but lower than Rother as a whole. At 20.2% the availability of rented social housing is almost double the rate of Rother as a whole and higher than the rate (17.7%) for England.

¹⁷ <https://www.rother.gov.uk/planning-and-building-control/planning-policy/corestrategy/>

¹⁸ <https://www.peasmarshndp.uk/vault15/PeasmarshHNA.pdf> paragraph 52

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The numbers of dwellings with a Council Tax Banding E-H is much higher in Peasmarsh than is the norm :



Source : East Sussex in Figures

Figure 6.2 : Dwelling Stock by Council Tax Band

The dominance of larger detached houses in the village makes it hard for younger families and first-time buyers to move in. The consultation with the stakeholders recognised this and suggested the need for more starter and 2-3 bedroomed homes in the village together with a move away from executive homes. In addition, there was a small requirement for bungalows to be built, which would enable older people to downsize whilst remaining living independently within the village.

This is discussed in Section 6.4.3

6.3.3 House Prices

House prices in Peasmarsh have risen significantly in the last 10 years, except semi-detached house prices :

Type	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	Growth
Detached	£222	£290	£275	£348	£345	£351	£435	£400	£373	£556	150%
Semi-detached	£250	£246	£228	£221	£240	£237	£230	£280	£218	£265	6%
Terraced	£165	£165	£160	£175	£200	£241	£260	£275	£258	£265	60%
All Types	£213	£246	£245	£250	£320	£314	£325	£335	£290	£405	90%

Source :: Land Registry PPD

Table 6.1 : Peasmarsh House Prices [prices in £k]

The median house price has risen from £212,500 in 2011 to £405,000 in 2020 – a 90% increase in 10 years.



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6.4 Assessing Housing Need

The Neighbourhood Plan has an important role in identifying local housing need and working to identify sites that could help meet that need.

A key role of a neighbourhood plan is to work with the local authority to provide a local context for future housing development, in the case of Peasmarsh to 2039. At the time of preparing this Plan the emerging Local Plan for Rother (2019-2039) has been at initial stages of preparation and therefore no figures have been identified.

The Housing Need Assessment [HNA] was undertaken for Peasmarsh by AECOM in late 2021 / early 2022 as part of the Neighbourhood Plan support package. The HNA is available [online](#) and as an Addendum to this Plan.

The key issues highlighted by that report are housing affordability, housing tenure and housing type.

6.4.1 Housing Affordability

Truly affordable housing provides a potential accommodation solution for those that need to live in the village but are unable to access open market price housing [whether for purchase or for rental].

The Rother Local Plan states:

On housing sites or mixed use developments, the Council will expect the following percentages of affordable housing within the district ... In the Rural Areas in the High Weald Area of Outstanding Natural Beauty, 40% on-site affordable housing on schemes of 6 dwellings or more; [2019 DaSA Policy DHG1 (iv) (a)]

The most referred to definition of affordable housing is that set out in Annexe 2 to the NPPF. This is the definition used by local planning authorities when making provision within their areas to meet local demand / need for affordable housing. The NPPF definition incorporates social rent, as well as a range of intermediate rent and for-sale products. However, the Affordable Housing Commission (2020) concluded “*many*” of these products “*are clearly unaffordable to those on mid to lower incomes*”¹⁹.

The AECOM HNA assessed affordability levels across the Neighbourhood Area [the parish]. It concluded that :

Newly forming households are unlikely to be able to afford to buy their own home in Peasmarsh.

The estimated average net annual household income before housing costs in Peasmarsh in 2018 was £37,400. AECOM further estimated the income for those both working and resident in Rother, using ONS data. That showed that the average income for a household in the lower two quartiles was estimated at £24,842.

It is immediately clear from this data that there is a large gap between the spending power of households in Peasmarsh and the price of housing, particularly those earning the lowest 25% of incomes and households which have only one earner.

¹⁹ [AHC : Making Housing Affordable Again: Rebalancing the Nation's Housing System](#) [large pdf file]

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To gain a clearer understanding of local affordability, it is useful to understand what levels of income are required to afford different tenures. This is done using 'affordability thresholds': the estimated amount of annual income required to cover the cost of rent or a mortgage, given local housing prices.

AECOM compared various measures of local incomes to the estimated costs of various housing tenures, including private renting and various forms of affordable housing. This is shown in Table 6.2 where green indicates 'affordable' and red indicates 'unaffordable':

Tenure	Mortgage value (90% of price)	Annual rent	Income required	Affordable on average incomes?	Affordable on LQ earnings (1 earner)?	Affordable on LQ earnings (2 earners)?
				£37,400	£12,446	£24,892
Market Housing						
Median House Price	£364,500	-	£104,143	No	No	No
LA New Build Mean House Price	£279,855		£79,959	No	No	No
LQ/Entry-level House Price	£270,900	-	£77,400	No	No	No
Average Market Rent	-	£14,184	£47,280	No	No	No
Entry-level Market Rent	-	£12,396	£41,320	No	No	No
Affordable Home Ownership						
First Homes (-30%)	£229,635	-	£65,610	No	No	No
First Homes (-40%)	£196,830	-	£56,237	No	No	No
First Homes (-50%)	£164,025	-	£46,864	No / Yes	No	No
Shared Ownership (50%)	£182,250	£5,063	£68,946	No	No	No
Shared Ownership (25%)	£91,125	£7,594	£51,348	No / Yes	No	No
Shared Ownership (10%)	£36,450	£9,113	£40,789	No / Yes	No	No
Affordable Rented Housing						
Affordable Rent	-	£6,108	£20,341	Yes	No	Yes
Social Rent	-	£5,122	£17,056	Yes	No	Yes

Source: AECOM Calculations

Table 6.2 : Affordability of Median Price House

The picture that emerges is that affordability is a major issue in Peasmarsh. Purchasing market housing is only an option for the highest earners or those with existing equity or substantial savings.

Table 6.2 is based on the median house price in Peasmarsh. Repeating the exercise using the lower entry-level house price results in a similar pattern except that heavily discounted affordable home ownership [First Homes -50% and no more than 25% Shared Ownership] becomes available to those on average incomes. These instances are shown in red/green in Table 6.2. For instance, the mortgage required for First Homes -50% drops to £119,500 so the associated required income drops to £34,071.

Affordable routes to ownership based on the median house prices do not offer enough of a discount to serve those earning the average income or below. When a more realistic benchmark related to the cost of terraced housing is used, they become more accessible. The HNA concludes that at least a 50% discount would be needed to make the new First Homes product affordable locally.

Affordable rented housing appears broadly affordable to average earners and lower earning households where there are two earners. This is positive because of the relative unaffordability of renting and market ownership.



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However, households in which there is only one lower quartile earner appear unable to even afford social rented homes. They may be able to afford a smaller [1-2 bedroom] social rented property, or a room in a shared house and, because of the ways benefits are calculated and combine, they are likely to be able to afford socially rented housing if available. Therefore, this tenure is a vital segment of the market, catering to those in the greatest need.

6.4.2 Housing Tenure

As discussed in Section 6.3.2 above, although Peasmarsh has a high home ownership rate, it also has a high percentage of rented social housing. There is little private rental accommodation available.

AECOM calculated the housing need for Peasmarsh for the length of the Plan :

Stage and Step in Calculation	Total	Description
STAGE 1: CURRENT NEED		
1.1 Current households in need	21	RDC waiting list data for households claiming a local connection to Peasmarsh and whose address includes the name of the village.
1.2 Per annum	1.2	Step 1.1 divided by the plan period to produce an annualised figure.
STAGE 2: NEWLY ARISING NEED		
2.1 New household formation	100.3	MHCLG 2018-based household projections for the LA between start and end of plan period. % increase applied to NA.
2.2 Proportion of new households unable to rent in the market	26.4%	(Steps 1.1 + 2.2.1 + 2.2.2) divided by number of households in NA.
2.2.1 Current number of social renters in parish	111.6	2011 Census social rented occupancy + LA % increase.
2.2.2 Number of private renters on housing benefits	13.8	Housing benefit caseload May 2018. Pro rata for NA.
2.3 New households unable to rent	26.5	Step 2.1 x Step 2.2.
2.4 Per annum	1.5	Step 2.3 divided by plan period.
STAGE 3: TURNOVER OF AFFORDABLE HOUSING		
3.1 Supply of social/affordable re-lets (including transfers) %	1.2	Average number of affordable rented homes that have come vacant in Peasmarsh in the years since 2017, supplied by RDC.
NET SHORTFALL (OR SURPLUS) OF RENTED UNITS PER ANNUM		
Overall shortfall per annum	1.4	Step 1.2 + Step 2.4 - Step 3.2
Overall shortfall over the plan period	25.9	(Step 1.1 + Step 2.3) - Step 3.2 * plan period

Source: AECOM model, using Census 2011, English Housing Survey 2018, MHCLG 2018 based household projections and net additions to affordable housing stock. 2018 is the latest reliable data for some datasets so is used throughout for consistency. Figures may not sum due to rounding.

Table 6.3 : Peasmarsh Housing Need

Additional need for those who have local connections with Peasmarsh but are not on the Local District Council housing list would double the affordable rented accommodation needed during the length of the Plan.

If affordable homes to buy [at a minimum discount of 50% of market value] were included this would add an extra 30 dwellings to the need.



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6.4.3 Proposed Housing Mix

The 2011 census shows 47.6% of households in Peasmarsh have 2 extra bedrooms and a further 34.9% have one extra bedroom, equating to a total over-occupancy of 82.5%. Under 65's with no children are the most likely to over-occupy, possibly people who have not yet had children and plan to in the future. 68.6% of houses in Peasmarsh have 3 or more bedrooms.

AECOM has suggested the following dwelling-size mix should be targeted.

Number of bedrooms	Current mix (2011)	Target mix (2039)	Balance of new housing to reach target mix
1 bedroom	7.1%	10.2%	21.4%
2 bedrooms	24.2%	32.7%	62.8%
3 bedrooms	45.6%	35.7%	0.0%
4 bedrooms	14.9%	15.3%	15.8%
5 or more bedrooms	8.1%	6.1%	0.0%

Source: AECOM Calculations

Table 6.4 : Proposed House Sizes

New development should focus on smaller houses, specifically as shown in the final column of Table 6.4, including semi-detached and terraced which will, by nature, be more affordable. The need for 4 bedroom affordable houses arises because some stakeholders have larger families. It is not the intention to develop 4 bedroom 'executive' homes.

The parish has seen extensive extension and refurbishment of some properties, in general of smaller and single story dwellings. This type of development reduces the number of smaller and more affordable properties available in the Neighbourhood Area [the parish] adding to the overall imbalance in the housing stock. Refurbishment and extension of properties will only be supported where it is not seen to be detrimental to the overall housing mix in the village and does not overextend the residential curtilage to the detriment of the character of the village or neighbouring properties.

Rother has a policy in place, LHN1, designed to ensure mixed, balanced and sustainable communities by requiring developments to, *inter alia*, :

- be of a size, type and mix that reflects current and projected needs;
- provide at least 30% smaller houses [mostly 2 bed] in rural areas;
- contribute to an overall balance of 65% social/affordable rented and 35% intermediate affordable housing for the affordable element;

However, this Plan has identified specific needs for the parish and therefore a more tightly specified policy is required.



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Policy H1 : Housing Mix

Housing development that responds to local needs by including a mix of housing in size, type and tenure with priority focused on medium and smaller homes will be supported. In particular at least 60% of dwellings should be 2 bedroom with approximately 20% 1 bedroom and 20% 4 bedroom. All should be affordable homes.

Smaller homes with future expansion designed in will be supported.

Conformity references : NPPF : 60 – 67, 78; RDC : Core : OSS3, RA1, CO5, LHN1, LHN2

6.4.4 Rural Development Beyond the Development Boundary

In view of the community aspiration to secure affordable housing for local people, the approach adopted is to support developments that meet this aspiration.

This applies whether they are small infill sites within the development area or small scale sites within the bounds of the village.

RDC policy LHN4 is concerned with development sites wholly or substantially for affordable housing. The policy requires identified local need for affordable housing which has been demonstrated in Section 5 of the Plan. Sites must be in a rural area – which is correct for all of Peasmarsh – and either within or adjacent to the settlement boundaries.

The supporting text acknowledges that a small amount of open market housing to incentivise development is possible. It also notes that larger sites [defined as 15 or more dwellings] would probably be contrary to the aim of achieving mixed, balanced communities.

Although the policy includes a requirement that the affordable housing remains so in perpetuity but it doesn't require that priority is given to people with local connections. Therefore a specific policy is required :

Policy H2 : Rural Affordable Housing Sites

Affordable housing sites delivered in accordance with RDC policy LHN4 will be supported subject to detailed requirements of national guidelines and other policies in this Plan being met.

In all cases, a legal agreement will be required to ensure that the affordable housing accommodation remains available to meet local housing needs in perpetuity, and that people with the greatest local connection are given highest priority in both initial and future occupancy.

Conformity references : NPPF : 60 - 67, 78 - 80; RDC : Core : OSS3, RA1, RA3, LHN4; HWMP : LBE2;



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In a rural locality dominated by its AONB status, development opportunities that do not impact upon the wider landscape are limited. Conversions of redundant barns and other farm buildings can however provide opportunities for new accommodation and a valuable and appropriate re-use of buildings. They could make a positive contribution to the local character of the area and provide support to the local economy through provision of accommodation for tourism and opportunities to develop small enterprises in the parish.

In this context, the Plan proposes that the conversion of rural buildings, be considered for both business and residential purposes, subject to standard planning criteria being met. Note, however, that priority for the conversion of rural buildings is given to commercial uses in accordance with RDC policy RA4, as discussed in Section 5.3.2 and set out in policy E3.

Policy H3 : Conversion of Rural Buildings to Residential Use

Planning applications for conversions of suitable redundant farm or other buildings to residential use will be supported, provided that :

- priority is given in accordance with RDC policy RA4;
- the proposals are consistent with protecting the character and landscape quality of the High Weald AONB;
- the design approach is appropriate and sympathetic to the building, surroundings and wider context;
- traffic, access, landscaping and general amenity considerations are satisfied;

Conformity references : NPPF : 80; RDC : Core : RA1, RA2, RA3, RA4; HWMP : LBE2;

6.5 Conclusions

To meet the needs of the community there is a need for small scale, high quality housing – including smaller properties to balance the parish age profile.

Because of the high prices of houses in the parish and the relatively low incomes for many of the households, there is strong requirement for much of that housing to be truly affordable, specifically reserved for those with local connections. In this context, truly affordable does not mean at 80% of open market price as is required by district practice, it means more like 50% of that price.

Based on the RDC waiting list, 26 homes will be needed up to 2039. Including those not on the list would double the need and adding those wanting to buy would add another 30 homes. The need is for two bedroom properties with some single and some four bedroom, truly affordable, ones. It is not possible to satisfy the full needs for a number of reasons.

Policy H1 sets the requirement for housing mix.

Affordable housing sites will be an important part of the housing strategy in the parish. Policy H2 accommodates this need. There may also be opportunities for the conversion of suitable redundant farm buildings, whether for residential or commercial use. Policy H3 accommodates this need with respect to residential use.



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7 Site Allocation

7.1 Introduction

Although housing was identified as a key concern for stakeholders, the scale and location of future developments and the consequent effect on the character of the village were also key concerns. According to the results of the July 2021 survey, less than half of the stakeholders are prepared to accept more than 25 new houses and few are prepared to accept more than 50 new houses.

The same survey identified that a large majority of stakeholders preferred development to be by infill or, at most, by developments of no more than 10 houses. There is, in any case, an overarching requirement imposed by the NPPF to limit development in AONB's.

Accordingly, the detailed objectives of the Plan with respect to sites are :

- provide truly affordable housing for people with local connections as identified in Section 6 of the Plan;
- to keep housing development to small scale, reflecting the local character and distinctiveness of the area;
- to keep individual developments to no more than 10 dwellings;

As a parish of nearly 600 homes situated in an AONB, the Plan allocates sites which could accommodate up to 32 homes. This needs to be added to the 45 homes that were allocated in the 2019 DaSA but which will only be built during the term of this Plan. Two other sites, which currently do not have vehicular access, have also been identified should problems arise with any of the allocated sites.

In addition, based on what happened in the last 10 years²⁰, 20 homes are assumed to come from windfall developments over the 18 years of the plan period. Given the AONB nature of Neighbourhood Area, small windfall sites should give great weight to conserving and enhancing landscape and scenic beauty, as sensitively located and designed to avoid or minimise adverse impacts as set out in the NPPF. Developments which do not meet these standards must be refused.

Any proposed development on those sites which were assessed but not allocated are clearly inappropriate for development and must therefore be refused.

7.2 Background

AECOM undertook a Site Options and Assessment [SOA] for this Plan, essentially based on national planning guidance. The results of that work were then taken by the PNDP volunteer group which expanded on them by applying detailed local knowledge, outcomes of previous planning applications, national planning rules, results from the public consultation and, where appropriate, specific factors not considered in the original work.

The resultant Peasmarsh Site Assessments [PSA] document was used to guide this Plan.

Both are available as Addenda to this Plan and online : [SOA](#) and [PSA](#).

²⁰ In the period from the 2011 census to 2019, 16 windfall houses were built

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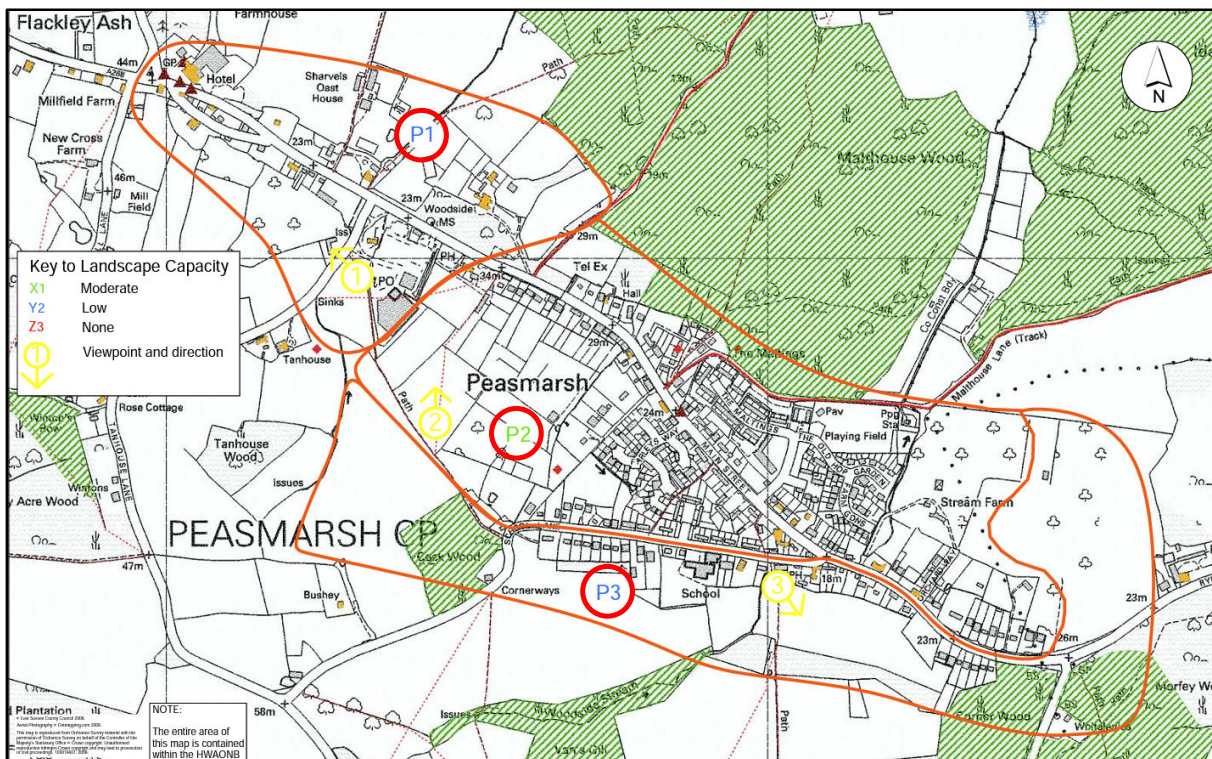
Of the eleven potential development sites assessed, five of them were rated as not suitable for development and four were rated as suitable with another two sites possibly suitable should a solution be found in the future to the lack of vehicular access.

There is also a site, PEA1, known locally as Pippins, which was designated in the Rother 2019 DaSA as suitable for 45 houses. Development has not yet begun but should begin and be completed in the period of this Plan.

The present sewage system and pumping station are working at [or near] capacity with frequent foul water flooding in houses, gardens and running down the street. In addition, the pumping station frequently discharges foul water directly to Woodside Stream and hence the River Rother onwards to the sea. In terms of development there are two distinct problems, the first being the capacity within the existing system and the second being that 4 of the possible sites are beyond the present system. This is especially true of those sites to the west of the village, Rother's preferred area for development as set out in its 2006 Rural Settlements Study²¹.

This must be addressed before any future development can occur.

As discussed in the PSA Section 2.6, in 2009 the ESCC Landscape Group undertook a landscape assessment for Rother district²². In the study three distinct zones were used to characterise Peasmarsh : P1 West of Village, P2 Central Paddocks and P3 South and East of Village as seen on the map in Figure 7.1 :



Source : ESCC Landscape Group

Figure 7.1 : Map of Landscape Assessment Zones

²¹ https://www.rother.gov.uk/wp-content/uploads/2020/01/Part_1_Rural_Settlement_Strategy.pdf [large pdf file]

²² https://rdcpbublic.blob.core.windows.net/website-uploads/2020/01/Market_Towns_and_Villages_Volume_1.pdf [large pdf file]



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The key points from the landscape assessment are as follows :

- P1 is a zone of **moderate to high** sensitivities with **low capacity** to accept change to housing, **low capacity** to accept change to business use and **moderate to low potential** to mitigate should either change occur;
- P2 is a zone of **low** sensitivities with **moderate** capacity to accept change to housing, **low** capacity to accept change to business use and **moderate** potential to mitigate should either change occur;
- P3 is a zone of **moderate to high** sensitivities with **low** capacity to accept change to housing, **no** capacity to accept change to business use and **low** potential to mitigate should either change occur.

In considering the implications of the assessment, it must be recognised that it is a series of generalisations and not specific to individual sites. As an example, the Flackley Ash site – strictly speaking outside of the area assessed – is adjacent to Zone P1 but is totally enclosed and isolated from the greater landscape whereas, if it were to the east of the hotel and not north [i.e. north of White House / west of Sharval's Oast House], it would be fully exposed in the greater landscape and therefore with high sensitivities, low or possibly no capacity to accept change and low or possibly no potential to mitigate.

7.3 Sites Issues

7.3.1 Scale of Development

The first public consultation in 2021 showed that only 48.8% of respondents considered that the parish could support more than 25 additional dwellings during the Plan period and only 12.9% considered that it could support more than 50 additional dwellings.

40.6% of respondents expressed a strong preference for infill development and another 48.5% were prepared to accept small scale developments of up to 10 dwellings per location. Only a small minority (10.9%) were prepared to accept larger developments.

These views of stakeholders are broadly in line with national rules with respect to development in AONB's.

The issue of development size is discussed in Section 7.4 below.

7.3.2 Development Boundary

The present development boundary is tightly drawn around the existing area of village housing. To allow development on the scale envisaged by Rother it would, of necessity, be outside the existing boundary [as happened with the DASA allocation of the Pippins site in 2019, where part of the site was outside the development boundary]. As well as being within the AONB much of the remaining land has special designation, such as ancient woodland or traditional orchard.

The RDC Local Plan suggests that future development could be to the west end of the village, closer to Jempson's campus. However, there are specific landscape and infrastructure constraints in this area which restricts the amount of developable land, as can be seen in the PSA.

This issue is discussed in Section 7.6 below.



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7.3.3 High Weald AONB

Peasmarsh being in the High Weald AONB means that special conditions apply when considering sites for potential development. Two paragraphs of the current National Planning Policy Framework [NPPF] dated July 2021 deal with developments in designated areas including AONB's :

- 176 concerns the conservation and enhancement of landscape and scenic beauty;
- 177 concerns major developments;

Similar wording has existed in the NPPF since its inception in 2012.

In addition, the HWMP policy S2 seeks to deliver new housing primarily through small-scale development and a mix of housing sizes that responds to local needs.

This issue is discussed in Section 7.4 below.

7.3.4 Rural Development

There are three categories of development possible away from Peasmarsh village :

- small scale such as extensions / outbuildings and possibly site subdivision to create a second dwelling;
- larger scale developments of up to 10 houses as discussed in Section 7.3.1;
- commercial developments, typically on farm sites as discussed in Section 5.3.2;

The first category might also fall into the third category when the intention is to create short-term accommodation for tourists.

In a parish dominated by its AONB status, development opportunities that do not impact upon the wider landscape are limited. However, provided that they are sustainable, conversions of redundant barns and other farm buildings can provide opportunities for new business premises or accommodation as a valuable and appropriate re-use of buildings.

As discussed in Section 5, such conversions could make a positive contribution to the local character of the area and provide support to the local economy through provision of accommodation for tourism and opportunities to develop small enterprises in the parish.

Rother has several policies regulating rural development including a specific Core Strategy policy, LHN4, concerned with sites wholly or substantially for affordable housing. It provides an appropriate and effective means of addressing rural local housing need by allocating land specifically for affordable housing.

The policy requires :

- identified local need for affordable housing;
- a rural area site either within or adjacent to settlement boundaries;
- that the housing remains available in perpetuity;

In its policy on Rural Exception sites, DHG2, Rother defines such sites as '*outside development boundaries*', whereas the sites for LHN4 are sites '*either within or adjacent to settlement boundaries*'.



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In the case of Peasmarsh the development boundary is clearly defined but the settlement boundary is not. Having some of the characteristics of a ribbon development the settlement extends a long way as seen on the map in Figure 8.1 [qv]. On that map the development boundary approximately extends around just the first four listed character areas.

7.4 Development Size

Several factors need to be considered in deciding permitted development size : the opinions of stakeholders, the requirements of national policy and regulation [NPPF and associated PPG] and the more specific requirements of the HWMP.

Local Opinion

Local opinion is relevant to plan making even though it carries little weight when determining proposed development applications. In 2021 South Oxfordshire District Council²³ expressed the view that :

Protection of valued views, a preference for smaller sites, and local impact on infrastructure are all factors that contribute to the local context.

The public consultations undertaken in creating the Peasmarsh Plan defined four sizes of developments :

village infill	1 to 3 dwellings per location
small scale	4 to 10 dwellings per location
medium scale	11 to 25 dwellings per location
large scale	no limit

The results of the survey in July 2021 showed that only 10.9% of respondents were prepared to accept developments larger than 10 dwellings. As set out in Section 7.3.1 above, there is a clear preference for infill and/or small scale development among stakeholders.

National Planning Policy Framework

Paragraph 176 of the current NPPF, brought into effect in July 2021, makes it clear that, *inter alia*, an AONB is to be given special consideration :

Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

²³ <https://www.southoxon.gov.uk/wp-content/uploads/sites/2/2021/12/What-is-major-development-in-an-AONB.pdf>



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Paragraph 177 of the NPPF builds on paragraph 176, stating :

When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of :

- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and*
- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.*

A footnote discusses what a major development might be :

For the purposes of paragraphs 176 and 177, whether a proposal is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.

This latter paragraph of the NPPF is less clear : who is the 'decision maker' to define a 'major development' and what are the bounds of setting the definition of a major development in these designated areas?

The NPPF differentiates between plan making [Section 3] and decision making on proposed development [Section 4]. From paragraph 38 of the NPPF at the start of Section 4 there is no doubt that the Local Planning Authority [LPA] is the decision maker with respect to proposed development :

Local planning authorities should approach decisions on proposed development in a positive and creative way. ...

However, that is not the case with respect to plan making, Section 3 describing two distinct layers of planning : community / neighbourhood / area plans where the decision maker is the qualifying body and the LPA's Local Plan where the decision maker is the LPA.

The question of what constitutes a major development has been addressed in court and by many planning appeal hearings. The consensus seems to be that that 'major development' cannot be determined by scale alone but requires an assessment rooted in the local context with many factors to be considered – including the views of stakeholders.

In the same 2021 document referenced above, South Oxfordshire DC identifies seven relevant factors :

Contiguity :	any development of more than a 'few houses' [the DC is not specific] not contiguous with the settlement area must be considered as a major development;
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Relative Size : it is not absolute size but relative size that is relevant; the document talks of a 4% increase in homes perhaps not being a major development and a 5% increase perhaps being one with other factors coming into play; importantly it also states :

In addition, when evaluating sites for inclusion in a Neighbourhood Plan, consideration must be given to proximity to other possible development sites which would combine to form one much larger site which would then be a major development.

Location : location relative to the built environment is said to be a critical factor in deciding whether a development would be major or not;

Visibility : the visibility of a development in the AONB, particularly from public rights of way, and views of the AONB being affected suggest that the development has a potential impact on the AONB; this applies even if mitigation is adopted;

Landscape Character : if there is impact on the landscape character of the AONB then even small developments will degrade the AONB;

Green / Brownfield : brownfield sites will normally have less impact on the AONB and thus be more acceptable;

Residents' Opinion : as discussed at the start of this section above;

It would seem that there is no simple answer as to what constitutes a major development. In terms of NPPF 177. However, because of NPPF 176, what is clear is that a development of a particular relative size which might not be considered a major development outside of an AONB could well be considered major inside of one.

High Weald Management Plan

The 2019-2024 HWMP has a policy, S2, to protect the historic pattern and character of settlement in the AONB. One part of the policy is :

- to seek to prioritise the delivery of new housing primarily through small-scale development and a mix of housing sizes that responds to local needs;

The relevant indicator of success given in the HWMP is that a greater proportion of new homes are delivered through redevelopment or small developments.

Peasmarsh

There are currently 394 dwellings inside the village development boundary but the potential development land within that boundary is essentially already built-out, certainly so in terms of developments of any size. A 4% increase would be 16 dwellings and a 5% increase 20 dwellings.

In order to comply with the preferences of stakeholders and the HWMP a limit of 10 dwellings is proposed for any future development whilst reflecting the words of NPPF 177 with respect to exceptions.



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Policy S1 : Development Size

Developments no larger than 10 dwellings will be supported whereas larger developments will not unless it can be shown that :

- i) exceptional circumstances exist; and
- ii) it is in the interests of the parish stakeholders;

Subdivision of a large site into blocks suitable for 10 dwellings in order to circumvent this limit will not be accepted.

Conformity references : NPPF : 176, 177; HWMP : S2;

Policy S1 rules out development of more than 10 homes, given that more than sufficient homes can be built without relying on such major development. It is not possible to undertake a major development within the parish, located within the AONB, while minimising adverse impacts in the way required by the NPPF.

7.5 Development Sites Allocation

7.5.1 Introduction

In the SOA undertaken by AECOM, a total of eleven sites were assessed. Four were from RDC's autumn 2020 site call, four from the PNDP group's autumn 2021 site call and three not put forward from site calls but thought to be worthy of assessment. The owner of two of the three latter sites subsequently made it clear that the sites were not available for development so they were not considered further even though assessed.

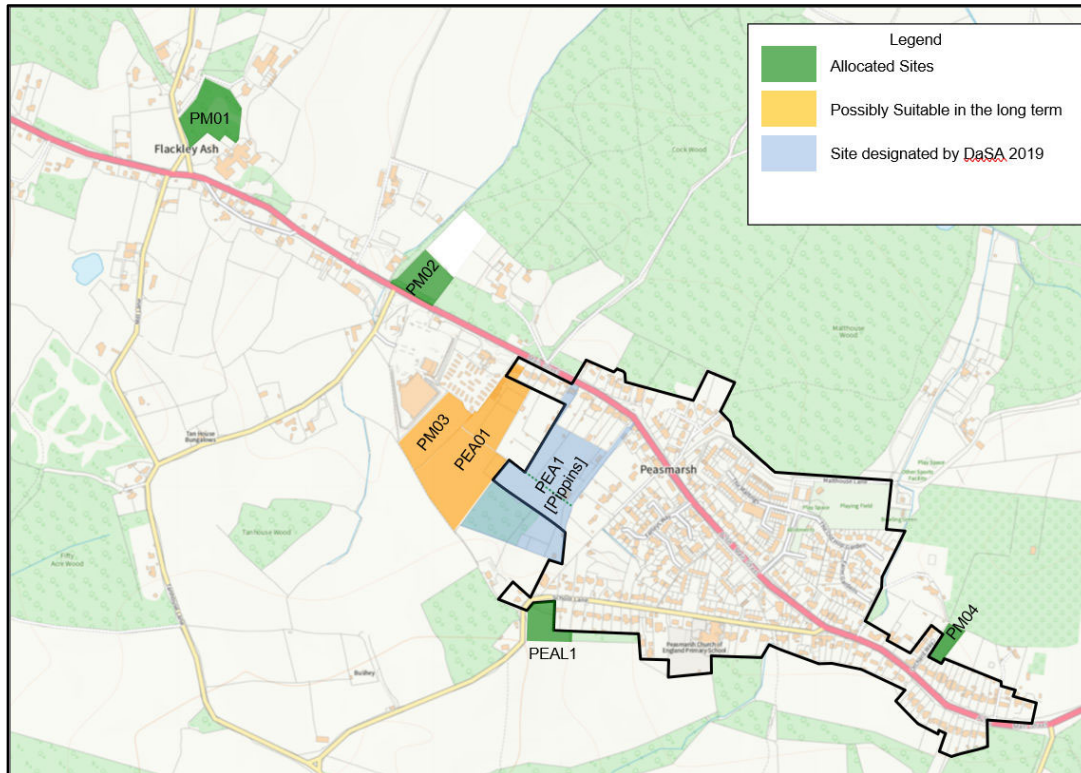
The AECOM work was based on national planning guidance. The PNDP group took the findings of the SOA and expanded on them by applying detailed local knowledge, results from the public consultation and, where appropriate, specific factors not considered in the original work. The result is a Peasmarsh Site Assessments [PSA] report.

RDC has not closed its site call and after the SOA was complete a landowner put forward two further sites in the parish. One a completely new site and one a new site combined with the third of the sites thought to be worthy of assessment and therefore already assessed. As part of the PSA the PNDP group undertook the assessment of the new land using the same methodology, terminology and pro-forma as used by AECOM in the SOA.

The four sites allocated as part of this Plan are shown below and on the map in Figure 7.2 [over]. The map also shows the two sites which are not allocated but could become available in the longer term should suitable vehicular access be found and the 2019 DaSA site.

Site	Gross Area	Suitability	Capacity
PM01 Flackley Ash	0.80 ha	yes	up to 10
PM02 Woodside	0.59 ha	yes	up to 10
PM04 Orchard Way	0.21 ha	yes	up to 5
PEAL01 Cornerways	0.38 ha	yes	up to 7
PEA01 Oaklands	2.31 ha	yes if	up to 10
PM03 Old Football Ground	0.82 ha	yes if	up to 10

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Source : PNDP Group

Figure 7.2 : Map of Allocated and Potential Sites

The allocated sites are listed in the following four sections.

7.5.2 PM01 Flackley Ash

The eponymous Flackley Ash site is to the north of the hotel and the separately owned Coach House, bounded on its west by Mackerel Hill and on its north by the unadopted lane from Mackerel Hill to Flackley Ash Farmhouse.

The site is remote from the existing development boundary and from the main residential area although there is a cluster of nearly 30 houses [considered by some to be a hamlet] within 250 metres of the junction of Mackerel Hill and the A268. However, it is less than 600 metres [650 yards] from the Jempson's campus.

Strictly speaking, the site is outside the area assessed in the 2009 Landscape Assessment²⁴ but as it is adjacent to Zone P1 of the assessment it should perhaps be treated as part of that zone. Zone P1 was rated as of medium to high visual and character sensitivity with low capability to accept change for housing.

²⁴ The PSA incorrectly states that it is within Zone P1.

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However, the Flackley Ash site is totally enclosed and secluded and does not feature in the greater landscape. As such, and not actually being in the assessment area, the site is therefore of more low to medium sensitivities with medium capacity to accept change and moderate to high potential to mitigate.

The site is completely surrounded by a tall, thick hedge and has some relatively young trees planted within it. However, many of those are exotic species [e.g. eucalypts] so it is envisaged that the site will be planted with appropriate native trees to enhance the biodiversity.



View from Flackley Ash site

The Flackley Ash Hotel is a Grade 2* listed building, protected for the original Georgian country house at the front of the property. However, the hotel is substantially larger than the original, having been added to over the decades if not centuries and the modern buildings stand between the original and the site. Even they are screened from view from the site.

The other relevant listed building is the Grade 2 listed Old Cottage. It is on Mackerel Hill but its rear backs onto the unadopted lane to Flackley Ash Farmhouse, on the other side of which is the site fully screened by a tall, wide hedge.

The site is considered suitable for development for affordable housing for people with local connections with up to 10 dwellings, provided that suitable mitigation is undertaken.

As with all development, the site does have some issues, not least the lack of easy access to the sewer system. Other aspects which need to be addressed are the relationship with both Mackerel Hill and the A268 and the distance to the primary school.

As discussed in Section 4, this Plan has a policy in place to have all of Peasmarsh village on the foul sewer network – and for that network to be adequately sized. Should development be considered before that is achieved then a common digester for all of the houses will be required.

At the moment, Mackerel Hill is delimited right up to the point of its junction with the 40 mph limit of the A268. That should be changed to limiting the hill 250 metres or so before the junction. It would also be necessary to have a suitable pedestrian crossing at the junction itself. As this is the point that the HWLT, a nationally important walking route, has to cross the A268 it is somewhat surprising that such a crossing does not already exist, particularly as the sightlines are not good and the road running fast with heavy traffic.

The primary school is not really within easy walking distance : the site is probably better suited to housing for older local people wishing to down-size.

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7.5.3 PM02 Woodside

The Woodside site adjoins the north side of the A268 on the lower slopes of Cock Hill. It is opposite Jempson's carpark and stretches to the northern branch of Woodside [variously Corkwood] Stream just past the junction of Tanhouse Lane and the A268.

The site not adjacent to the development boundary or the main residential area. However, it is well related to the village, is very close to the services offered by the Jempson's campus and would continue the linear development along Main Street.

The site is in the centre of Zone P1 of the 2009 Landscape Assessment and P1 was rated as of medium to high visual and character sensitivity with low capability to accept change for housing.



Woodside site viewed from Jempson's Campus

However, the site is screened on the south east side by over 100 metres of deciduous woodland and is screened on the south west and north west by a hedge of trees and shrubs. On the remaining [north east] side the site is ultimately screened from the greater landscape by Cock Wood. It is therefore totally enclosed and secluded and does not feature in the greater landscape. As such, the site is therefore of more low to medium sensitivities with medium capacity to accept change and moderate to high potential to mitigate.

The site is about 100 metres west of and about 10 metres below Woodside, a Grade 2* listed building and its associated, separately listed, Grade 2 stables. It is immediately east of Sharvels Farmhouse [listed as Grade 2 'Sharwells Home For The Elderly']. It is neither visible from nor have views of any of the listed buildings.

The site is considered suitable for development for affordable housing for people with local connections with up to 10 dwellings, provided that suitable mitigation is undertaken.

Again, the site does have some issues, not least the possible lack of easy access to the foul sewer system. Other aspects which need to be addressed are the relationship with the A268 and the distance to the primary school.

Whether the site has easy access to the foul sewer system or not depends on whether SW's official map of the network or its relevant response to the Regulation 14 draft is correct. The map in Figure 4.2 [qv] shows the network terminating at the top of Cock Hill, some 170 metres south east and about 10 metres above the site. However, in its response, SW states that '*the sewer main on Main Street is 80 metres from the 'Woodside' address point and just 10 metres from the southern edge of the PM02 development boundary*'.

It may be necessary for a development at Woodside to have a foul water pump to lift the flow into the sewer if it occurs before the network is extended as discussed in Section 4.

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The logical place for access to the site is at the junction of Tanhouse Lane and the A268 so that it becomes a four-way junction rather than three-way. Control of such a junction could either be with a roundabout or with traffic lights but, either way, a pedestrian crossing would need to be incorporated into the scheme.

Although much closer to the primary school than the Flackley Ash site, the site is still 800 metres from the school.

7.5.4 PM04 Orchard Way

The Orchard Way site is a plot at the end of that short lane, behind the houses on Main Street directly east of the lane. It is the only site considered by AECOM to be rated overall as 'green' : suitable, available and achievable.

The site is adjacent to the existing development boundary which could be readily adjusted to include the site. However, it is at the east end of the village and therefore not well placed for access to the Jempson's campus which is a kilometre away.



View south across Orchard Way site

The site is within Zone P2 of the 2009 Landscape Assessment and P2 was rated as a zone of low visual and character sensitivity with moderate capability to accept change for housing and moderate potential to mitigate. The site is probably typical of the zone and shouldn't be particularly up- or down-graded from that overall assessment. It would, however, be considered as backland development which is a negative point in the South Oxfordshire DC document discussed in Section 7.4.

Grade 2 listed Stream Farm Cottage is on Main Street, immediately west of Orchard Way lane. There is the potential for it to be impacted by a development on the site but mitigation opportunities exist.

The site is considered suitable for housing development with 5 dwellings.

Issues to be resolved with this site include access down the narrow lane, the relationship between the lane and the A268 and the surface water course that passes along the southern boundary of the site.

The lane is only suitable for one way traffic which would have to be a shared surface for traffic and pedestrians. At the road junction ESCC notes that, at the junction, the lane needs to be 5m wide. ESCC also states that a pedestrian crossing would be needed across the A268. That is a very sensible decision but as there are already 25 properties on the 'wrong' side of the A268 it should not be related to a development of five more, it should be implemented as soon as possible.

There is a surface water course that passes along the southern boundary of the site, but this can be addressed in the design as part of the SuDS requirement. There is already a pond on the property.

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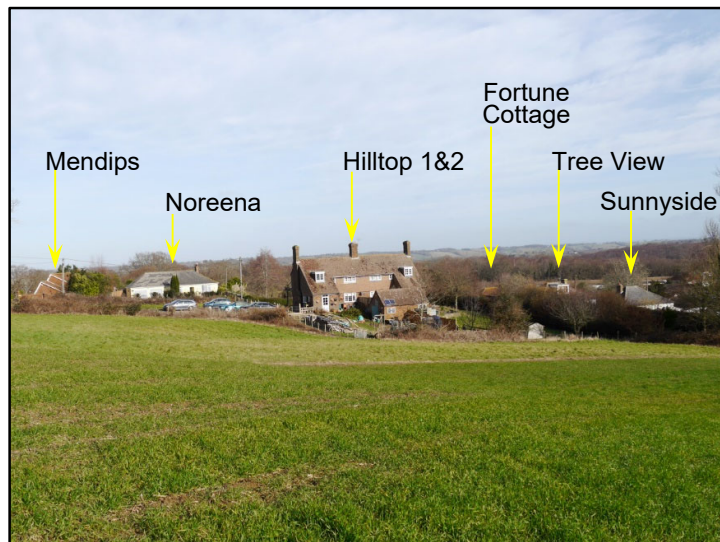
7.5.5 PEA L01 Cornerways

The Cornerways site is at the top of the School Lane hill opposite The Mount, where the road turns south. It is on the south side of the lane and is the land where the residents of Hilltop currently park their cars. The site is adjacent to the development boundary and the built-up area. It is less than 300 metres from the school and less than 500 metres from the Jempson's campus.

The site is in Zone P3 of the 2009 Landscape Assessment in contrast to the north side of School Lane which is in Zone P2. P3 was rated as of moderate to high visual and character sensitivity with low capability to accept change for housing with low potential to mitigate. Being adjacent to existing housing the site is of moderate sensitivity with some capability to accept change and some potential to mitigate.

On the other hand the site [paler green on the right] is exposed to the greater landscape when viewed from the two footpaths which cross Retford Field relatively close to the site, albeit a view with an urban feel thanks to the houses on School Lane. RDC describe the site as having a strong rural character but that depends on the point and direction of view.

There are no designated heritage assets in the area although The Mount, dating from before 1840 as it shows on the tithe map, should be classed as a non-designated asset.



The site viewed from PRoW PSM/22/1

The site is considered suitable for development with 7 dwellings provided that access is acceptable to the highway authority. In the last two years there was a vehicle collision at this location when a vehicle exiting from the site was hit by a car coming up School Lane.

There are several issues to be addressed with the Cornerways site : the landscape impact, access and sewage disposal being some of them.

There is an approximately 15 m wide band of trees behind six of the houses on School Lane. Extending that westwards along the southern boundary of the site using native species would shield the greater landscape from any development. There is also a vintage oak tree either on the site or next to it. That must be protected and included in the site landscape proposals.

Access to the site on a bend in School Lane is potentially a serious problem as sightlines will be limited. This is a matter for the ESCC highways team which has set out how any potential developer would start to discuss the issue with the team.

The site is approximately 110 metres beyond but above the end of the foul water sewer in School Lane as shown on the SW official map. Whilst an inconvenience, this is not seen as an unsurmountable problem.



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This particular site was submitted to RDC at a very late stage so was not assessed in the SOA. Instead, the PNDP group undertook an assessment based on the same methodology as the SOA work. Before the design moves forward for any proposed development there should be an independent assessment undertaken, possibly by AECOM, to verify or otherwise the findings of the PSA.

7.5.6 Other Potential Sites

There are two sites which are potentially suitable for development in the longer term. Neither currently has an acceptable means of vehicular access but that might be solved over the life of the Plan, particularly as the sites are adjacent to each other. They are included in the Plan should any of the allocated sites not be developable, not as additional sites.

PEA01 : Oaklands

Oaklands, behind and including the house of that name immediately east of the Cock Inn, is one of two potential development sites on the remaining paddocks in the core of Peasmarsh village. It adjoins the Pippins site which was designated for development in Rother's 2019 DaSA.

The site is adjacent to the existing development boundary which could be extended to include the site. It is also at the west end of the village which is Rother's preferred area for future development of the village. Further, it is in Zone P2 of the 2009 Landscape Assessment which was rated as of low visual and character sensitivity with moderate capability to accept change for housing, albeit with moderate to low potential to mitigate the impact of such changes.

What complicates the issue is that the site is exposed to the greater landscape of the AONB and the HWLT passes along the south west edge of the field which is, at the point, bounded by Zone P3 rated as of moderate to high visual and character sensitivity with low capability to accept change for housing with low potential to mitigate. That means that the site is somewhere between a P2 and a P3 assessment.

This was recognised by AECOM in the SOA and limited any possible development to the northern part of the site, well away from the south west edge. This was clarified to mean the land north and east of the fence that runs from approximately TQ 88521 east 22815 north to approximately TQ 88463 east 22857 north.

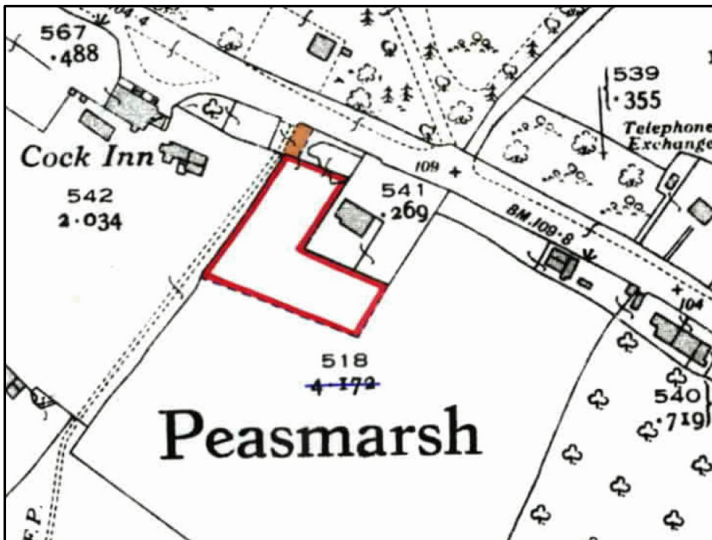
Another issue related to the AONB is that discussed in Section 4 above with respect to NPPF 177 and the opinion of South Oxfordshire DC with respect to relative size in determining what constitutes a major project. The site is adjacent to the designated Pippins site and therefore *'would combine to form one much larger site which would then be a major development'*.

The site might be potentially suitable for a housing development of 10 dwellings once a solution has been found for vehicular access to it. This is unlikely in the short term but possible in the period of the NDP to 2039.

The problem with access is that the site does not have full access to the A268. The Register of Title [ESX8571] held by the Land Registry states :

- 2 *Notice entered in pursuance of Rule 254 of the Land Registration Rules 1925 on 2 September 1975 that the registered proprietor claims that the land in this title has the benefit of a right of way over the land tinted brown on the filed plan.*

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Scrap View of part of Land Registry Plan ESX8571

The right pertains only to the house and garden plot of the site. The majority of the site is registered under a separate title.

The landed tinted brown is narrow and even if was found to grant access to the whole site, it emerges onto the A268 right on the crest of Cock Hill in the 40 mph zone where sightline requirements would not be achievable.

Access through the Pippins development has been suggested but as that development already has a serious access issue that doesn't make sense.

As discussed in the PSA, the next most difficult aspect for this site is surface water disposal using a fully compliant SuDS system.

PM03 : Old Football Ground

The Old Football Ground is adjacent to and west of PEA01 Oaklands : it is the field directly behind the caravan park at the Cock Inn and hence adjacent to the Jempson's campus in the cutting below. It is the other site on the remaining paddocks in the core of Peasmarsh village. It has the same general characteristics as PEA01, Oaklands, above.

In this case, other than access through PEA01 Oaklands it has been suggested that access could be achieved via PEA025 Tanhouse. However, Tanhouse was rated as not suitable for development, the HWLT follows that route and there is a very narrow pinch point where Tanhouse and Old Football Ground meet. When questioned on this, AECOM was adamant that such an access should not be permitted²⁵ :

I can also say that we would not consider access through PEA025 acceptable, we have rated PEA025 red on the basis of several issues, and additionally I think that the perimeter between PEA025 and PM03 of 5 metres is far too narrow to accommodate an access road. This is additionally occupied by the route of a public footpath also signposted as the High Weald Landscape Trail, and is the vantage point for views from the public footpath of the landscape to the west and the south alongside several listed buildings.

Policy P2 is on the next page :

²⁵ Email from Angus McNeill Peel of AECOM, Apr 6 2022

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Policy S2 : Allocated Sites

The Plan allocates the following sites for residential development :

PM01 Flackley Ash : affordable housing site, up to 10 dwellings

PM02 Woodside : affordable housing site, up to 10 dwellings

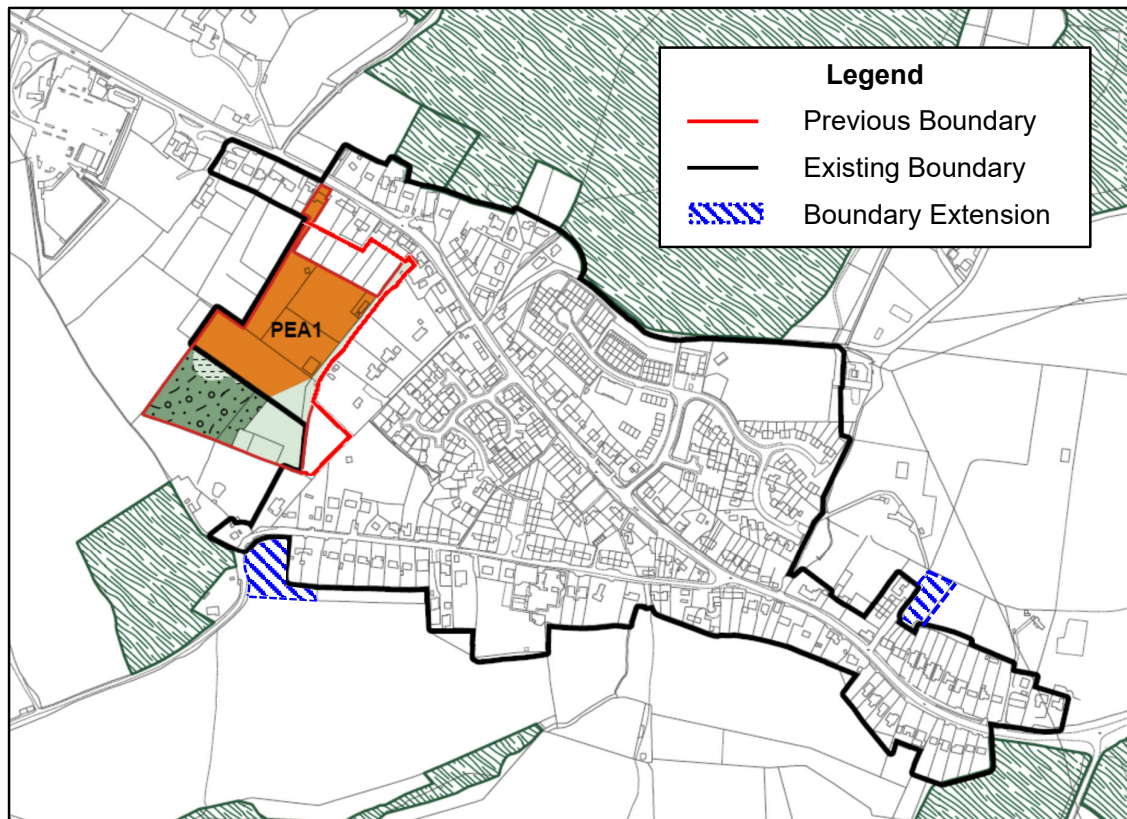
PM04 Orchard Way : development boundary extension, up to 5 dwellings

PEAL01 Cornerways : development boundary extension, up to 7 dwellings

Developments of more than three houses shall only take place on allocated sites.

7.6 Development Boundary

In order to accommodate two of the allocated sites, the existing development boundary must be extended as shown in Figure 7.3 below. There are two extensions, one at the south west corner to accommodate the PEAL01 Cornerways site and one on the north side of the eastern part of the boundary to accommodate the PM04 Orchard Way site.



Source : extract from RDC DaSA 2019, Policies Map Inset Map 12: Peasmarsh

Figure 7.3 : Map of Development Boundary and Extensions



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The development boundary is not fixed in perpetuity and has changed a number of times to incorporate new development, most recently in 2019. The boundary extents will be reviewed as part of the implementation and monitoring of the Plan.

Development sites outside of the development boundary, with the exception of agricultural conversions, are affordable housing sites.

Policy S3 : Development Boundary

Subject to RDC approval, the Peasmarsh development boundary is hereby extended as shown in Figure 7.3. The extent of the boundary shall not be changed without reference to Peasmarsh Parish Council.

Any development outside of the boundary, with the exception of agricultural conversions, must comply with the guidelines for affordable housing sites. In this context affordable housing shall be let or sold at no more than 50% of the market rate for the particular property.

Conformity references : RDC : Core : OSS2;

Defining affordable housing as no more than 50% of the market rate reflects the findings of the HNA as discussed in Section 6.4.1 and illustrated in Table 6.2 : that is the affordability requirement in the parish context.

7.7 Conclusions

Given that the parish has exceeded its current Local Plan housing target to 2028 and is in the AONB where major development has a detrimental effect means that development within the parish must be restricted as outlined in this Plan.

Four sites are allocated for development [one with a possible access concern] with a further two sites nominated as potential development sites in the future should problems arise with the allocated sites.

The allocated sites are capable of delivering 32 dwellings. In addition, it is reasonable to assume that infill sites and similar windfalls will, in the next 18 years, deliver 20 houses. On that basis, this Plan anticipates a total of 52 houses. The two 'potential' sites do not currently have vehicular access but that might be resolved during the period of the Plan.

In addition, the PEA1 Pippins site from the 2019 DaSA is expected to come forward in the period of this Plan for planning permission with potentially up to 45 dwellings.

Three of the allocated sites do not have easy access to the sewer. Given that Peasmarsh is designated as a service village the sewer system should serve at least all of the village.

In order to accommodate two of the sites, it is proposed that the development boundary be increased marginally.

The one site, PEA L01 Cornerways, was not assessed by the consultants. Should a developer wish to build there it would be necessary for a consultant such as AECOM to assess its suitability.



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8 Design and the Built Environment

8.1 Introduction

The High Weald is one of the best-preserved medieval landscapes in North West Europe. The special features that contribute to its unique character include

- its underlying clay and sandstone geology;
- the historic settlements that have evolved over centuries;
- the routeways that connect those settlements;
- the abundance of woodland [much of which is designated Ancient Woodland];
- the patchwork of agricultural field and heath, bounded by hedgerows and woods, that are typically used for livestock grazing, with distinctive areas of lowland heaths and river valleys;

Peasmarsh parish displays many of the features characteristic of the High Weald, including extensive ancient woodlands, scattered historic farmsteads and hamlets, a wealth of listed buildings and the main village itself, located on an historic routeway probably first used by the Romans. The archaeological notification areas in the Parish emphasise the rich heritage that exists locally.

The value of good design to physical and mental health and wellbeing is equally important. Accordingly, the detailed objectives of the Plan with respect to Design and the Built Environment are :

- to preserve and enhance the rural character of the parish;
- to enhance the environment and landscape of the parish;
- to ensure development is sustainable, well designed and complements the diverse character of the village;
- to maintain the distinctive views and visual connectivity with the surrounding countryside;
- to protect and enhance biodiversity by minimising the impact of development;
- to reduce the environmental impact of new buildings by using appropriate technologies;
- to protect the dark night skies of the parish;

Every objective will also contribute to the health and wellbeing of stakeholders.

8.2 Background

At a national level, the government has published the National Design Guide²⁶ which establishes ten design principles for creating a well-designed place and from that has come the National Model Design Code²⁷. Also at a national level is the Building for a Healthy Life 2020²⁸ guide prepared by the building industry.

²⁶ <https://www.gov.uk/government/publications/national-design-guide>

²⁷ <https://www.gov.uk/government/publications/national-model-design-code>

²⁸ <https://www.udg.org.uk/publications/othermanuals/building-healthy-life>



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The High Weald AONB Partnership, including the 15 local planning authorities, has prepared a Design Guide for new housing development in the High Weald. The guide encourages an understanding of how the landscape and its settlements have evolved and why the area is the way it is today before providing design advice on how development needs to respond to local built and natural character.

As part of its guidance, High Weald has published a series of colour palettes ['Main', 'Coast and Lower River Catchment' and 'Western High Weald Woodland and Heath'] for use in new developments.

As part of its Core Strategy, RDC has set out a series of seven Key Design Principles :

Character and Legibility

This is concerned with ensuring that new development respects and contributes to the individual character and local distinctiveness of the parish.

Continuity & Enclosure

This seeks to ensure that streets and spaces lead to a successful development within the wider context.

Quality of Public Realm & Ease of Movement

This is concerned with optimising the overall development, including pedestrian movement and car parking.

Diversity

This seeks to ensure physical and social integration within the development as a whole.

Landscape Setting of Buildings and Settlements

This seeks to ensure that development responds positively to the setting and also retains positive landscape characteristics within and beyond the site.

Design in Context

This requires all design proposals to be based on robust site and context analysis.

Building Appearance & Architectural Quality

This expects high architectural quality, beauty and inspiration, and the clear following-through of an architectural vision in materials and detailing regardless of building style.

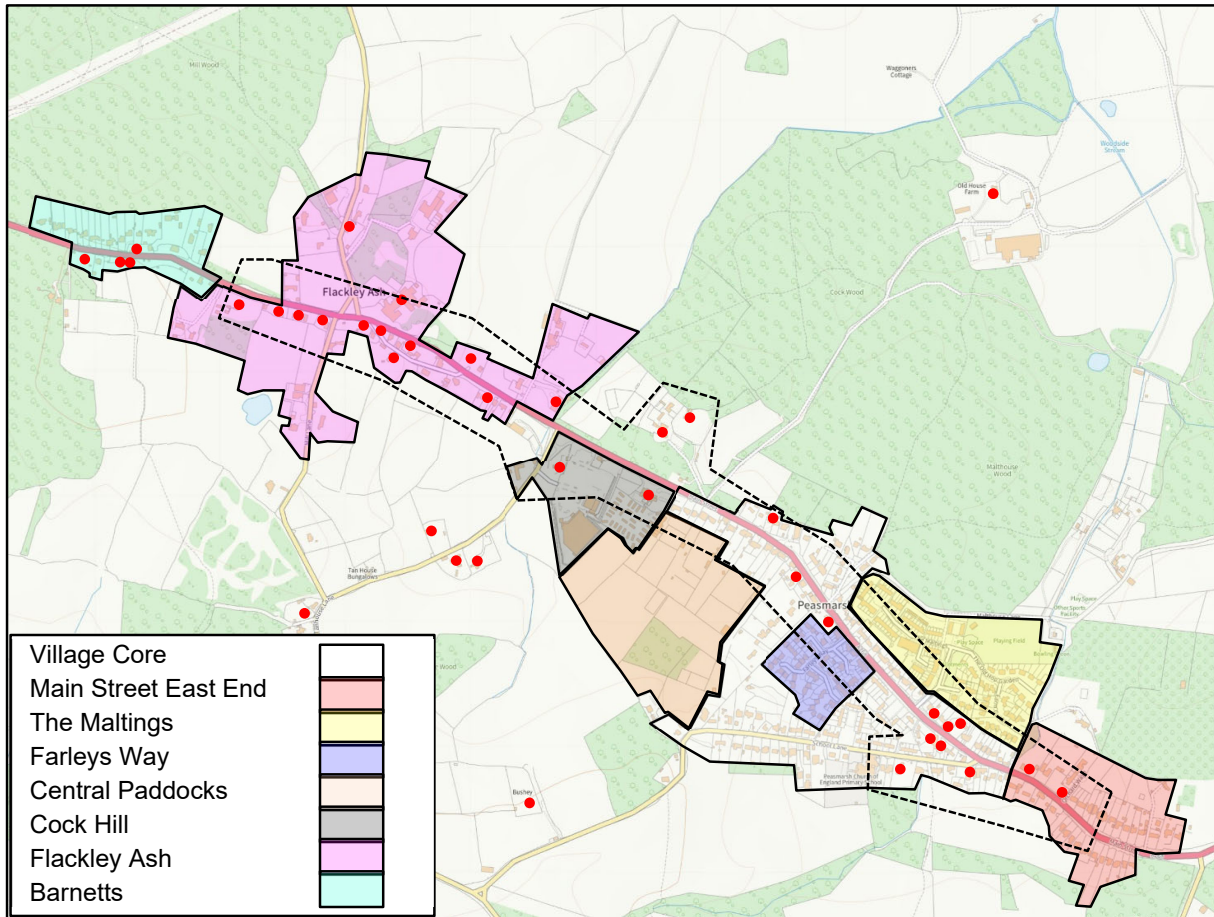
Sustainable Design

This is concerned with minimising the environmental and ecological impact of new developments.

All of the above have application to any development proposals within the parish.

8.3 Existing Character Areas

Eight character areas have been identified in Peasmarsh village, each with its own characteristics. These are shown on the map in Figure 8.1 [over]. The map also shows listed buildings, identified by a red dot and the approximate Archaeological Notification Area, identified by a dashed grey outline :



Source : PNDP Group

Figure 8.1 : Map of Existing Character Areas

Addendum D6, the Peasmarsh Villagescape and Design Codes document, includes an illustrated report on the village character areas. Short summaries of each are given below.

8.3.1 Village Core

This part of the village is an eclectic mix of old and new with a significant number of designated and non-designated heritage assets. Much of it is also designated as an ANA. Some of the properties are centuries old, many are old while others are modern. There is a similar spread in terms of size and housing density.

House styles cover the full range to be seen in the village : bungalows, small 2 story cottages, semi-detached houses, terraced houses and detached houses with white weatherboard, red tile hung and red brick exteriors and thatch, red/brown clay tile, slate and modern cast tile roofs.



The 1842 School Building

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8.3.2 East End



Four houses completed in about 2015, the last possible infill along Main Street in this area

This is also an area of old and new – the last houses were only built in 2015 or so – but the feel is more open than the village core. The newer properties tend to be those further way from the village core.

House styles are also somewhat eclectic though less so than the village core. There is a predominance of detached two-story houses although there are many bungalows and bungalows converted to 1.5 story properties, a few semi-detached and one small terrace. Materials are white weatherboard, red tile hung and red brick exteriors and red/brown clay tile and slate or synthetic slate roofs.

8.3.3 The Maltings

This part of the village is actually two distinct sub-areas : the original local authority estate and a smaller estate created by a private developer or developers. The former included a sheltered accommodation complex which was demolished and replaced with modern facilities and additional social housing in the last five years.

Much of the original estate is long terraces of 1.5 and 2 story terraced dwellings in various styles constructed with a yellow brick. Many are white weatherboarded on the upper story. Roofs are tiled with cast tile. The overall feel is of a high density area.



Streetscape of the original Maltings estate

The later estate is a mixture of semi-detached and detached 2 story houses although there are a few bungalows. For the most part the reddish brick used in construction is unadorned although there are a few tile-hung upper stories but none are weatherboarded.

8.3.4 Farleys Way

Farleys Way is a modern, self-contained estate developed on the site of the original village garage and repair shop. The development was built in the 1990's. Part of it fronts on to Main Street.

House styles are mixed although there is a relatively high percentage of detached two-story houses. Materials are mainly red tile hung and red brick exteriors [with some white weatherboard on the Main Street properties] with modern cast tile roofs. The overall feel is open despite there being 30 dph because there are few fences on front gardens.

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Typical streetscape of Farleys Way



The Cock Inn

8.3.5 Central Paddocks

The central paddocks are all that remains of the field systems close to the centre of the village. There is no development here, the land being used for grazing horses, keeping chickens and the like.

The only reason that the paddocks are identified as a character area is that part of this area, PEA1 – locally known as Pippins – was designated for development in Rother's 2019 DaSA but no firm development plans have yet come forward.

8.3.6 Cock Hill

The Cock Hill area of the village is an anomaly, in part because there is little housing and in part because it is strongly commercial with The Cock Inn and Jempson's campus. The inn operates a caravan park at the rear of the property, about one third of them being occupied for most of the year.

8.3.7 Flackley Ash



Georgian building at Flackley Ash Hotel

Thought of as a hamlet by some, Flackley Ash consists mainly of older houses at the west end of the village. There is a high proportion of designated and non-designated heritage assets and the ANA extends as far as here.

Dwellings styles are very mixed and date anywhere from the 16th to the 20th centuries. They are mainly 2 storeys although some are 2.5 storeys and there are also a few bungalows. There is a broad mix of materials including tile-hung [scalloped and plain], weatherboard, exposed timber framing and mainly soft terracotta red brick.

There are 13 listed properties in this area including the Grade 2* listed Flackley Ash Hotel. The ANA reaches as far as the west end of this character area. There are two sets of oasts.

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8.3.8 Barnetts

This is the far west end of the linear village, beyond Flackley Ash. This too is an area with an eclectic mix of styles with properties of a considerable age as well as more modern buildings. Pedestrian connectivity is poor and the public right of way network is positively dangerous where it has to cross the A268 at the west end of the area just as motor vehicles come up a blind hill crest.

Some dwellings are shielded from the road by vegetation and several properties are set on backland plots. They are mainly 2 storeys although some are 2.5 storeys and some have 1 storey elements. There are also a few bungalows.



Old Thatch

Materials are similar to those in the Flackley Ash area but a greater proportion are of modern build. There are 4 listed properties, all Grade 2, in this area including Old Thatch, a 17th century or earlier timber-framed building, part of which may have been a shop at one stage.

8.4 Design Codes for New Developments

Peasmarsh displays many of the High Weald's characteristic features, including ancient woodland, many listed buildings, a maze of historic routeways, scattered historic farmsteads and hamlets and Peasmarsh village itself, located on a very important historic routeway. The various archaeological notification areas emphasise the rich local heritage.

The Plan seeks to ensure that development proposals within the parish reinforce this character – both from landscape and villagescape perspectives – and that housing is appropriate across ages and households whilst having the lowest environmental impact possible. The Plan also seeks to ensure that development is sustainable.

The parish has established a series of design codes for future developments. This section of the Plan refers on to the greater detail in the relevant document : Addendum D6 : Peasmarsh Villagescape and Design Codes.

8.4.1 Local Setting

In order to maintain the character of each area, a balance needs to be struck between the scale, bulk, density and height of the built form and that of open green spaces and, where appropriate, the wider landscape.

Additionally, consideration must be given to the impact on local heritage assets, whether designated or not, as well as archaeological remains.

Developments should therefore be designed to be of high quality and reinforce [preferably enhance] the local character, heritage assets and the High Weald setting of the development. The density of development should consider the site's context and landscape setting whilst optimising land use.



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Housing density should be lower on the outer edges of the settlement where it is adjacent to open countryside in order to maintain views to and from developments.

Policy D1 : Local Setting

Development must conserve and enhance the character area in which it is located. Developments that have regard to the following will be supported :

- i) Designs must demonstrate how the local context has been considered and that they reflect the character and vernacular of the area using architectural variety in form and materials.
- ii) Innovation in design will be supported only where this demonstrably enhances the quality of the built form in a character area.
- iii) Development proposals must address the criteria in Design Code 3.2 in Addendum D6 : Peasmarsh Villagescape and Design Codes, as appropriate to their scale, nature and the location of development.

Conformity references : NPPF : 126 - 136; RDC : Core : OSS3, RA1, EN2, EN3; DaSA : DEN1, DEN2;

8.4.2 Placemaking

Good quality design of a development's environs, improving the built environment, is essential to a good quality of life. It should improve public health, reduce crime, ease transport issues and provide a supportive neighbourhood.

Issues raised during the public consultations included :

- retaining the feel of a rural village with small scale developments, something which accords with the High Weald guidance on reducing sprawl;
- integrating green space and native planting to reflect the wider landscape within the development;
- ensuring that good drainage systems are used so that surface water flooding is not created off-site;
- providing adequate car parking for residents and visitors; many of the existing houses were built before cars became ubiquitous;
- ensuring that new developments are within easy access of footpaths to encourage active travel;
- shielding the community from the negative effects of the A268; houses should be set back from the road and protected from road noise and vibration;
- ensuring that each development is suited to an ageing population;

The layout of new housing developments must reflect the rural nature of the village which is characterised by road layouts that do not dominate the development, high levels of pedestrian permeability, off road parking, garden sizes proportionate to the character of the area and natural boundary treatments.



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Policy D2 : Placemaking

Development must demonstrate a high quality of setting design, which responds and integrates well with its surroundings, meets the changing needs of residents and minimises the impact on the natural and historic environment.

Development proposals must demonstrate how they have considered and addressed the matters in Design Code 3.3 in Addendum D6 : Peasmarsh Villagescape and Design Codes as appropriate to their scale, nature and location.

Conformity references : NPPF : 126 - 136; RDC : Core : EN2, EN3, EN5, TR3, TR4; DaSA : DHG4, DHG7, DHG8, DHG9, DHG10, DHG12, DEN1, DEN4, DEN5;

Part of the requirements of Design Code 3.3 is the installation of sustainable drainage systems as set out in Section 4.3.5 of this Plan.

8.4.3 New Homes

The design features of the individual new homes can have a significant impact on the character of an area.

Design Concepts

The 2021 NPPF states that “*Planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties.*” The standards encourage provision of enough space in homes to ensure that they can be used flexibly by a range of residents. Other standards aim to ensure that sufficient storage can be integrated into dwelling units, emphasising that they are minimum space standards.

The development of “Lifetime Homes” helps to ensure that dwellings are appropriate for the needs of older persons whilst still meaning that they are suitable for other types of occupiers such as first-time buyers. The Lifetime Homes standard “*seeks to enable ‘general needs’ housing to provide, either from the outset or through simple and cost-effective adaptation, design solutions that meet the existing and changing needs of diverse households*”.

Proposals for new housing in Peasmarsh are especially encouraged to meet the Lifetime Homes standard.

Just as some of the HAPPI guidelines are appropriate to overall site design for an aging population, others are relevant to house design.

Another important consideration – particularly with an older and aging population – is that of dementia. The Royal Town Planning Institute 2020 guidance on Dementia & Town Planning should be consulted during the design process.

Affordable Housing

Proposals that include affordable housing will be required to ensure that :

- i) it is designed so that it is ‘tenure blind’ [indistinguishable from open market housing either on site or, where schemes do not include on site open market housing, the wider area];
- ii) where appropriate, small clusters of affordable housing are distributed around a larger site;



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External Facade

Despite the eclectic mix of house styles across the parish, there are still dominant materials in evidence influenced by local availability : red brick, red tile and white weatherboard.

Typically the façade of two story houses will be a mixture of two of the materials : brick lower floor with traditional tile or weatherboard upper or weatherboard lower floor with traditional tile upper. Whilst some older properties have slate roofs, the predominant roofing material is red tile.

98% of stakeholders support the continued use of these traditional materials.

The High Weald AONB guidance also provides details of materials and suppliers to ensure new developments integrate and are 'good neighbours' with existing buildings and landscapes.

Sustainability

Sustainability is such an important topic that the discussion is devolved to Section 8.4.4.

Policy D3 : New Homes

Development must demonstrate a high quality of dwelling designs, which respond and integrate well with their surroundings and meet the changing needs of residents.

Development proposals must demonstrate how they have considered and addressed the matters in Design Code 3.4 in Addendum D6 : Peasmarsh Villagescape and Design Codes as appropriate to their scale, nature and location.

Conformity references : NPPF : 126 - 136; RDC : Core : CO5, EN2, EN3, EN5, TR3, TR4; DaSA : DHG3, DHG4, DHG6, DHG7, DHG11, DHG12;

8.4.4 Energy Efficiency and Sustainability

As part of achieving the government's 'net zero' target, all new development must have minimal energy use and net carbon emissions. That has implications for site design, house design and materials specifications.

Houses should be highly insulated, have low water demand and be fitted with, or directly connected to, renewable energy systems. Opportunities to retrofit existing developments will also be supported, where this can be achieved sympathetically and without detriment to neighbouring properties or the landscape.

Planners and developers are strongly encouraged to make use of energy efficient materials and to consider high-efficiency alternative systems and facilities for development sites. In this context, the orientation of buildings can be important in order to make best use of available sunlight.

The government's 'Future Homes Standard' is a set of rules that will come into effect from 2025 to ensure new homes produce less carbon emissions. To help lay the groundwork for its introduction, the government substantially changed the Building Regulations in June 2022. New homes in England now need to produce around 30% less carbon emissions compared to the old regulations.



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There is an opportunity to improve and promote sustainability in the parish by:

- following basic passive environmental design, encouraging the use of insulating materials to minimise energy loss;
- integrating renewable energy systems and high efficiency energy solutions into new development;
- reducing water consumption through grey water systems;
- promoting sustainable forms of transport through priority systems for pedestrians and cyclists;
- promoting sustainable waste management and recycling; and
- supporting landscape-sensitive, small-scale renewable energy schemes, tailored to the conservation of the AONB;

D4, the policy for Energy Efficiency and Sustainability is on the next page :



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Policy D4 : Energy Efficiency and Sustainability

The design and standard of any development is required to achieve the highest level of sustainable design, in order to reduce energy consumption and climate effects.

- 1 Development proposals which incorporate the sustainable design features below as appropriate to their scale, nature and location will be supported, where such measures will not have a detrimental impact on character, landscape and views :
 - i) incorporate on-site energy generation from renewable sources;
 - ii) optimise site and house orientation in order to assist with passive solar design and any relevant renewable energy solutions;
 - iii) use high quality, thermally efficient building materials;
 - iv) install energy efficiency measures such as loft, draft and wall insulation and triple glazing;
 - v) reduce water consumption through the use of grey water systems;
 - vi) provide low carbon sustainable design and avoid or mitigate all regulated emissions using a combination of on-site energy efficiency measures [such as insulation and low energy heating systems], on-site zero carbon technologies [such as solar tiles] and, only where necessary, off-site measures to deal with any remaining emissions;
 - vii) install lower wattage light sources;
 - viii) provide adequate, future-proofed off-street electric vehicle charging points for each dwelling;
- 2 Alterations to existing buildings should be designed with energy reduction in mind and comply with current sustainable design and construction standards.
- 3 Alterations to existing historic assets, whether designated or not, in order to improve energy efficiency should be informed by Historic England best practice and designed to reflect Historic England's 'whole building' approach.
- 4 Development proposals for landscape-sensitive, small-scale community-scale renewable energy schemes that contribute towards reducing greenhouse gas emissions and carbon neutral targets will be supported where it is demonstrated through suitable site specific analysis that the proposal :
 - i) has regard to High Weald AONB guidance;
 - ii) makes provision for the removal of the facilities and reinstatement of the site, should it cease to be operational;
 - iii) ensures existing public access is not impeded;
 - iv) does not result in the loss in use of Grades 1, 2 or 3a agricultural land;

Conformity references : NPPF : 11,155,156; RDC : Core : SRM1, EN7, TR3; DaSA : DRM1, DRM2, DEN5, DEN7; HWMP : G3;

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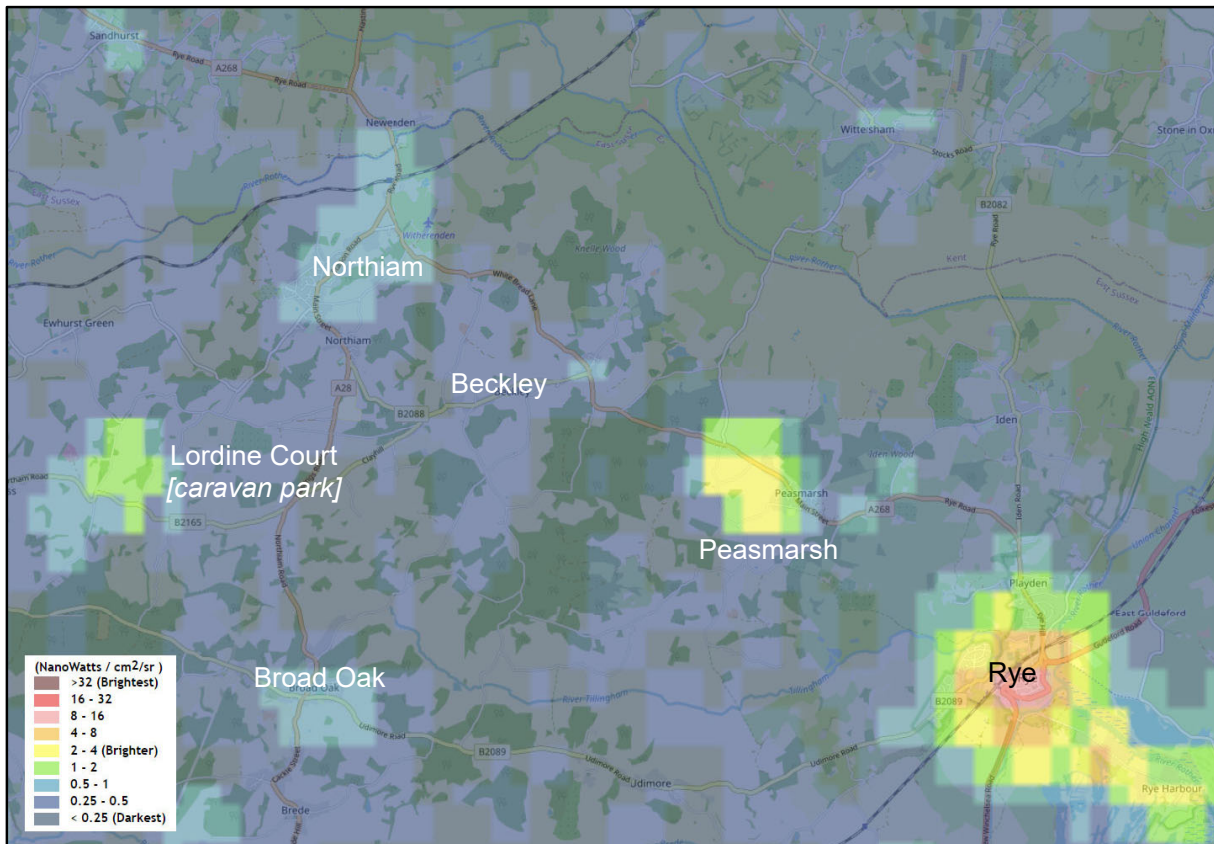
8.4.5 Dark Skies

Dark skies are defined by the OED as “*places where the darkness of the night sky is relatively free of interference from artificial light*”.

The High Weald is an intrinsically dark landscape, benefitting from some of the darkest skies in the south east. These unusually dark skies have been identified as worthy of conservation by the International Dark Sky Association with many benefits.

The NPPF states that planning policies and conditions should “*limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation*”. It is supported by the National Planning Policy Guidance on Light Pollution which was last updated in 2019.

The Campaign to Protect Rural England has mapped night-time England in its entirety using satellite imagery and offers an online interactive map²⁹ of the data. Although much of the parish enjoys low light levels, the area of Jempson’s campus lets a lot of light emanate :



Source : CPRE

Figure 8.2 : Map of Parish Nighttime Radiance

Section 10 includes a project to see whether this can be reduced without compromising the safety and security of the campus.

²⁹ <https://www.nightblight.cpre.org.uk/maps/>



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The Institute of Lighting Professionals publishes a table of light emanation in its guidance on obtrusive light :

Zone	Surrounding	Lighting environment	Examples
E0	Protected	Dark (SQM 20.5+)	Astronomical Observable dark skies, UNESCO starlight reserves, IDA dark sky places
E1	Natural	Dark (SQM 20 to 20.5)	Relatively uninhabited rural areas, National Parks, Areas of Outstanding Natural Beauty, IDA buffer zones etc.
E2	Rural	Low district brightness (SQM ~15 to 20)	Sparsely inhabited rural areas, village or relatively dark outer suburban locations
E3	Suburban	Medium district brightness	Well inhabited rural and urban settlements, small town centres of suburban locations
E4	Urban	High district brightness	Town / City centres with high levels of night-time activity

Table 8.1 Table of Light Emanation Zones

RDC has adopted this guidance, specifically applying Zone E1 to the AONB with the exception of settlements in the AONB where Zone E2 applies. Unfortunately, there is no direct conversion between sky quality meter units [SQM] used in the table and the luminance units used in Figure 8.2.

White light, with more blue content, is generally more disruptive to wildlife, and human sleep, than yellow/orange light and should be avoided.

Policy D5 : Dark Skies

Development proposals which include external lighting must demonstrate an essential purpose to the occupier or beneficial impact to the community and have regard to the current policies and guidelines of the High Weald AONB and RDC.

For the purposes of this policy, 'essential purpose' means for safety or security.

All lighting should be designed to minimise light spill.

Where it can be demonstrated as meeting an essential purpose, external lighting [including temporary lighting and lighting of sports facilities] should be of a sensitive and proportionate nature. The impact of all external lighting should be minimised in terms of direction, power, colour and duration. A lighting plan submitted with the proposal should set out how this is to be achieved.

Conformity references : NPPF : 185; RDC : Core : CO6; DaSA : DEN7; HWMP : OQ4;



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8.5 Conclusions

Protection and enhancement of the villagescape and the surrounding landscape is an important concept when contemplating new developments. The Plan establishes policies to ensure that that happens beyond the protection afforded by national regulations.

Design codes have been developed and imposed on new development :

- to protect the setting in which they are built;
- to ensure that the development site is designed to work well and sit comfortably with the existing village;
- to ensure that the homes that are built meet the needs of the parish and reflect the vernacular of the village;

A policy has been established to ensure that all new development is both energy efficient and sustainable and another policy has been established to protect the dark skies of the parish.



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9 Implementation and Monitoring

Following final consultation with Rother and with local residents, formal examination and a referendum held within the parish, the PNDP is expected to come into force in mid-2023.

Once the Plan is effective there will be a series of actions that need to be undertaken to ensure that the policies within the Plan are being interpreted and used in the way intended by those making planning decisions. PPC will be particularly concerned to judge whether its policies are being effectively applied in the planning decision process. It will also be necessary to maintain a watching brief on changes to planning regulation at all levels which may have an impact on the policies.

Additionally, the projects and activities that are outside the remit of the Plan, but described in Section 10, will need to be prioritised for delivery.

9.1 Specific Actions

Specific actions to be undertaken include :

- 9.1.1 Commenting on planning applications or consultations relating to the parish [the Neighbourhood Area]; the Parish Council has a role in ensuring that the Plan policies are being adequately considered, where relevant, in decisions to determine the outcome of planning applications.

A meeting between local councillors, planning committee members and the supporting planning officers at RDC would be a useful step in ensuring that the purpose and application of the policies is fully understood by all parties. This will assist in ensuring that policies are interpreted and applied in the way intended.

It would be beneficial for the meeting to develop indicators to measure the success of the Plan in applying the policies and securing the vision/objectives. A tabular approach would be one approach :

PNP Policy	Vision/Objectives	Indicators
Policy E1	<ul style="list-style-type: none"> • Thriving rural community • Sustainable and appropriate development • Range of facilities 	Amount of new E class floorspace created.

- 9.1.2 Monitoring the application of the Neighbourhood Plan policies to ensure they have been applied consistently and interpreted correctly in response to planning applications; there is scope to identify indicators to measure the effect that each policy is having and the extent to which this is delivering against the associated objective.



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As a minimum, the Parish Council would wish to maintain a log of planning applications relating to the neighbourhood area, detailing which Neighbourhood Plan policies have informed the Parish Council response and the outcome of the decision. This will assist in understanding whether the policies have been used in the manner intended or whether changes may be required, for instance in any future review of the Plan.

- 9.1.3 Maintaining a dialogue with RDC regarding the timing and content of the emerging Local Plan – it will be important to consider the policies in the emerging document and how these may impact the Neighbourhood Plan policies. The adoption of the new Local Plan may trigger an update of the Neighbourhood Plan.
- 9.1.4 Maintaining a watching brief on the national policy landscape – changes at the national level may impact on the policies contained in the Local Plan and this Plan. This might also provide a trigger to undertake a light-touch review of the Plan.
- 9.1.5 Maintaining a dialogue with neighbouring parishes on cross-boundary projects and issues.
- 9.1.6 Maintaining a dialogue with the local community on the Plan implementation – ensuring that all records of how the Plan has been used should be made public. A regular update should be included in the Chairman's report to the Annual Parish Assembly to feed back to the community on progress about both the effectiveness of the policies and the pursuing of projects.
- 9.1.7 Considering gaps in the Plan – local issues, concerns or opportunities may arise during the lifespan of the plan that trigger the need for the inclusion of a new policy or a modification to an existing policy. Such issues can be most effectively understood by maintaining open dialogue with the community and other partners.
- 9.1.8 It is good practice to review a plan periodically. This may be because of any of the points noted above. A light-touch review will enable PPC to keep the Plan up to date in general terms and to ensure that it remains in general conformity with the wider development plan. Any review should be undertaken in partnership with and ensuring the engagement of the wider community.

Peasmarsh Parish Council will take responsibility for considering how best to progress these actions.



10 Community Aspirations

During the preparation of the Plan the stakeholders raised a number of issues and suggested actions that fall outside the remit of the Plan. They are, however, considered no less important and in some cases help to address issues created by past development. They should also help mitigate the impacts of future developments undertaken in accordance with the Plan.

10.1 Delivery of Affordable Housing

The Plan sets out the need of the parish for truly affordable homes for people with local connections. Indeed, the lack of a requirement for a local connection for the existing social housing reinforces the opposition to further affordable housing development in the parish.

The Plan also identifies two sites which must be rural exception sites. The NPPF definition of rural exception sites is :

Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. A proportion of market homes may be allowed on the site at the local planning authority's discretion, for example where essential to enable the delivery of affordable units without grant funding.

Such sites therefore satisfy the need expressed by the stakeholders. It is important to stress the 'in perpetuity' : if any of the homes are sold rather than rented out then they must be sold back to the organisation running the site. It cannot be possible for someone to buy a home at a heavily discounted price and then sell it on at full market price.

One way of delivering a rural exception development is to form a parish Community Land Trust [CLT] as has been done in Icklesham parish. A CLT is a non-profit entity that develops and manages affordable housing on behalf of the community, often in partnership with a housing association. A partnership with a housing association helps attract the finance required for a development.

In order to progress a Peasmarsh CLT, PPC will have to approach potential partners but to do that it needs a more definitive statement of affordable housing needs. It will therefore need to commission an affordable housing assessment which will involve confidential information so must be kept at arm's length. Action in rural Sussex [AirS] is one possible organisation to carry out the assessment.

Thereafter PPC will be able to approach potential partners with the objective of establishing its own trust to develop one or other of the two rural exception sites.

Project 1 : Delivery of Affordable Housing

Investigate the establishment of a Peasmarsh Community Land Trust, initially by commissioning a specific affordable housing assessment and thereafter by approaching potential partners.



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10.2 Road Safety, Traffic and Parking

Improving road safety, particularly on Main Street and School Lane would improve the quality of life for all stakeholders. The parish already has an active Community Speedwatch group and operates a BlackCat traffic monitor which gathers data 24 hours a day – see Appendix A2.

10.2.1 Road Safety

It is now demonstrable that the majority of vehicles passing through the 30mph zone on the A268 are exceeding the speed limit with 85th percentile speeds [i.e. 15% of the traffic is travelling faster than that speed] of up to 35mph and small numbers are travelling in excess of 60 mph.

Pedestrian safety is not just an issue on the 30 mph zone of the A268 it is perhaps more important in the 40 mph section and it is also an issue on School Lane.

The primary policy on this issue in the Plan is I1. To support that policy, it is proposed that a working group be established to describe the traffic issues faced across the Parish, research solutions, engage with ESSC Highways and Sussex Police to trial proposals and campaign to implement measures to reduce traffic speed – and hence noise – and improve pedestrian safety.

Project 2 : Road Safety

Establish a parish working group tasked with finding and implementing acceptable solutions to the traffic issues faced across the parish.

10.2.2 Parking

Parking is an issue in Peasmarsh village because many of the dwellings date from an era when car ownership was not the norm so no provision was made for parking. The major problem is along the lower reaches of School Lane where the problem is exacerbated by the presence of the school which does not have any parking provision for staff and many pupils arrive and leave by car.

There is also a problem at the junction of the Maltings with the A268 where parking reduces the carriageway to one lane right on the junction itself due to the loss of the layby that resulted from the latest Maltings development.

10.2.3 Public EV Charging

As part of its Net Zero initiative, the Government has announced plans to end the sales of new fossil fuel vehicles by 2030 and hybrids by 2035. Electric vehicles [EV's] are expected to be the norm for cars, particularly as charging times shorten, ranges increase and more charging points become available.



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Whilst all new builds will have EV charging capability as standard, existing dwellings will not and for those without parking will not be able to safely do so in any way. Public EV charging is likely to be the only solution for those residents.

In addition, the parish has to consider its tourism sector : tourists will expect to be able to charge their EV's conveniently.

Project 3 : Parking and Public EV Charging

Work with the highways authority and local government organisations to explore whether more parking and public EV charging can be established in Peasmarsh Parish, perhaps in combination with traffic calming measures.

Keep abreast of emerging EV solutions and strategies and work with the relevant authorities and stakeholders to promote the installation of adequate public EV charging facilities for those unable to have access to private facilities.

10.3 Infrastructure Issues Register

As noted in Section 4, the parish is very much in need of infrastructure improvements but there is a lack of a central record of infrastructure problems. This can be resolved by making use of the power of the internet.

Project 4 : Recording of Infrastructure Issues

In order to ensure that PPC is aware of any problems that arise with infrastructure and can feed back to suppliers and planning authorities collective knowledge of such issues :

- establish and publicise a central point for the collection of information to monitor infrastructure issues in Peasmarsh;

10.4 Promotion of Tourism

Peasmarsh does not have any substantial tourist attractions but is within 1066 Country and is situated close to a considerable number of attractions, including Rye, Battle and Winchelsea, several world class environmental sites, Bodiam Castle and Great Dixter house and gardens.

It is therefore seen by tourists as a place to stay more than as a destination *per se*. To that end, the parish has a hotel, a vineyard with hotel accommodation attached, two pubs – one with rooms to let and the other with a caravan park and camping facilities – and many places offering bed and breakfast or self-catering accommodation.

However, the High Weald Landscape Trail runs through Peasmarsh village and the Sussex Border Path passes through the northern part of the parish. The northern parish boundary [also that of the district and county] is the River Rother where there are further opportunities to promote green tourism. The vineyard, plus the creation of traffic-free greenways proposed in policy L6, could all form part of a move towards green tourism in the parish.



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What seem to be missing are a coordinated approach to marketing the parish and an associated 'visit Peasmarsh' website.

Project 5 : Promotion of Tourism

Set up and maintain a coordinated ongoing approach with local businesses to market and promote Peasmarsh as a tourist destination.

10.4 Enhancing Our Parish

The Parish Council has identified two groups of actions required in order to enhance life in the parish :

- i) supporting the parish facilities;
- ii) engendering and enhancing the community spirit of the parish;

There is a definite interaction between the two.

10.4.1 Facilities

The parish has several important facilities :

Memorial Hall

The parish has the benefit of the restored and expanded Memorial Hall which hosts a number of activities including yoga, pilates, flower arranging, a film club and art exhibitions among others. The hall, originally built as a memorial to those from Peasmarsh who gave their lives for the country in WWI, is probably as close as Peasmarsh comes to having a village centre.

The Memorial Hall is a registered charity and has its own independent committee and trustees.

Recreation Ground and Pavilion

The parish also has the benefit of the recreation ground and its pavilion together with children's playpark, skatepark and basketball goal. The recreation ground and pavilion are used to host sports training sessions in school holidays and football matches during the winter months.

At present the recreation ground facilities have a small volunteer committee who supervise the day-to-day running and maintenance of these facilities.

Allotments

Peasmarsh has eleven allotments – all currently being worked – and is looking to increase this number by creating additional plots in the now unused bowling green.

The allotments are administered by the Parish Council for the benefit of all Peasmarsh residents.



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All these facilities receive funding from PPC. The parish needs to ensure that they flourish for the benefit of all.

Project 6 : Parish Facilities

Ensure ongoing support for these facilities and encourage greater use by all residents.

10.4.2 Community Spirit

Although Peasmarsh is a friendly village the community spirit could be usefully enhanced by re-introducing activities that were stopped because of the pandemic. The potential was clearly seen during the run-up to, on the day and subsequent to the celebrations of her late Majesty's Platinum Jubilee.

In addition there is always a need for community support which would benefit from being more coherent. One example of such support is Hands of Hope which runs a lunch club in the Memorial Hall once a month.

One of the most important needs is not the elderly but the younger generation which does not have a youth club, a scout/guide group or other such facility.

One specific initiative might be to establish a Neighbourhood Watch scheme in the parish in order to make it a safer and therefore better place to live.

Project 7 : Community Spirit

Work with all interested parties to help support communal activities which will benefit the community, either by binding the community more closely together or by giving help to those that need it.

10.4.3 Neighbourhood Communications

There are a variety of communication channels in the parish, some of which overlap because the ecumenical parish – quite rightly – has its own resources independent of the secular parish. There are a variety of websites, social media pages, notice boards and magazines but today's emphasis is clearly electronic communication which does not sit well with all. In addition Jempson's has its own communication channels.

Project 8 : Neighbourhood Communications

Work with all interested parties to improve the communications in the neighbourhood by adopting a common approach commensurate with the limitations imposed by GDPR.



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10.4.4 Developer Contributions

Contributions for the parish from developers are collected through the Community Infrastructure Levy [CIL]. The CIL allows local authorities to set a fixed-rate charge per square metre of new development used to address the cumulative impact of development in an area.

CIL was introduced across Rother in 2016 and applies to new residential and some retail development. Fifteen percent of CIL receipts are passed directly to parish and town councils where the developments took place. This rises to twenty-five percent if a Neighbourhood Plan is in place.

A series of activities has been identified by PPC for possible funding by the CIL :

- installing a pedestrian crossing over Main Street;
- improved road junctions on the A268;
- creating traffic-free greenways both through Peasmarsh village and between there and Rye;

10.4.5 Dark Skies

The radiance map in Figure 8.2 shows the extent to which Jempson's security lighting impacts on the night sky in Peasmarsh.

Project 9 : Dark Skies

Work with Jempson's to investigate the feasibility of reducing the light emissions of the security lighting without compromising the safety and security of the campus.

10.4.6 Non-Designated Heritage Assets

The parish has many listed buildings but it also has some significant buildings which are not listed. These are referred to as non-designated heritage assets in the Plan but there is not, as yet, a record of what they are. In order to make the Plan more comprehensive such a record is required.

Project 10 : Non-Designated Heritage Assets Register

Develop, with strong community input, a register of what are considered to be significant buildings worthy of being called non-designated heritage assets.



Peasmarsh Neighbourhood Development Plan 2021 to 2039

Regulation 15 Submission Appendices

February 2023



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Appendix 1 : Policies List

3 : Landscape, the Environment and Heritage

Reference and Title	Policy
L1 : Protection of Locally Significant Views	<p>As appropriate to their scale and nature, development proposals within the shaded arcs of the views below, mapped in Figure 3.9, should be designed in a way that safeguards the locally significant view or views concerned :</p> <p>PMLV01 from Main Street [A268] opposite Old Winders looking north across the Rother Valley</p> <p>PMLV02 from the fields above Sharvels Farm on PRoW PSM/8/2 looking north across the Rother Valley towards Wittersham</p> <p>PMLV03 from School Lane at Bushy looking north west towards Flackley Ash and beyond</p> <p>PMLV04 from PRoW PSM/22/1 looking east</p> <p>PMLV05 from the fields behind the Church on PRoW PSM/24/3 looking north towards Wittersham</p> <p>PMLV06 from Church Lane looking south towards Fairlight and Hastings</p> <p>PMLV07 from Clayton Farm on PRoW PSM/32/4 south/south looking east towards Rye and the sea</p> <p>PMLV08 from Tillingham farm on PRoW PSM/30/5 looking south across the valley to Udimore</p> <p>Development proposals in parts of the parish beyond these view arcs should identify and, where possible, integrate views across the High Weald, in particular where these can be enjoyed by the general public.</p>
L2 : Protection of Habitats	<p>Development proposals must safeguard the future health and retention of habitats in the parish, particularly priority habitats listed in Table 3.1 and shown in Figure 3.10 together with the associated habitat network zones. Development proposals which would unacceptably impact on the future health and retention of habitats will not be supported.</p>



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L3 : Protection of Trees and Woodland	Development proposals must safeguard the future health and retention of ancient woodland, protected trees and ancient or veteran trees and seek to encourage the creation or extension of woodland habitat networks. Development proposals which would unacceptably impact on the future health and retention of ancient woodland, protected trees and veteran or ancient trees will not be supported.														
L4 : Protection of Biodiversity	<p>All development must contribute to a 15% net gain in biodiversity within the development site or offset within the parish as required by and measured in accordance with the Environment Act of 2021. Should Rother subsequently introduce a higher biodiversity net gain requirement then that higher value shall apply.</p> <p>Householder applications and permitted development do not have to seek to achieve this level of biodiversity net gain.</p> <p>Development proposals which do not comply with this policy will not be supported. Planning applications must be accompanied by a biodiversity net gain report setting out the baseline and proposed method of achieving the gain.</p> <p>Proposals to use parish land as a biodiversity net gain host for other locations will be supported provided that they comply with all other policies in this Plan.</p>														
L5 : Protection of Local Green Space	<p>The Plan designates the following local green spaces, also shown in Figure 3.12 :</p> <table border="0" data-bbox="737 1276 1365 1612"> <tr> <td>PMGS01</td><td>Recreation Ground and Play Area</td></tr> <tr> <td>PMGS02</td><td>Maltings Allotments</td></tr> <tr> <td>PMGS03</td><td>Old Bowling Green</td></tr> <tr> <td>PMGS04</td><td>Church Grounds</td></tr> <tr> <td>PMGS05</td><td>Brickfield Green</td></tr> <tr> <td>PMGS06</td><td>Cock Pond</td></tr> <tr> <td>PMGS07</td><td>Park View Green</td></tr> </table> <p>Development proposals within the designated local green spaces will not be supported except as permitted by the NPPF regulations with respect to proposals in the Green Belt.</p>	PMGS01	Recreation Ground and Play Area	PMGS02	Maltings Allotments	PMGS03	Old Bowling Green	PMGS04	Church Grounds	PMGS05	Brickfield Green	PMGS06	Cock Pond	PMGS07	Park View Green
PMGS01	Recreation Ground and Play Area														
PMGS02	Maltings Allotments														
PMGS03	Old Bowling Green														
PMGS04	Church Grounds														
PMGS05	Brickfield Green														
PMGS06	Cock Pond														
PMGS07	Park View Green														



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<p>L6 : Retain and Improve Public Access</p>	<p>The Plan encourages green infrastructure for all developments. Green infrastructure outside of new developments will also be supported. Where appropriate, development proposals will be expected to include green infrastructure enhancements within the parish. That includes traffic-free routes and improvements to the local public access networks with particular consideration of the historic routeways as shown in Figure 3.7.</p>
<p>L7 : Sustainable Public Transport</p>	<p>In order for Peasmarsh to operate as a service village, improvements in the provision and use of public transport will be supported by :</p> <ul style="list-style-type: none"> i) Advocating for improved sustainable public transport connectivity for the parish to include : <ul style="list-style-type: none"> a) reliable, more frequent and integrated services allowing travel to larger service centres; b) extended provision from early morning to later evening including weekends, at affordable fares in order to provide sustainable transport options for commuting, access to services [especially health] and social purposes; c) consideration of patients needing to reach health service destinations; ii) Promoting integration of the local bus service with other bus services and the rail service at the Rye transport hub; iii) Seeking community transport solutions on a range of fronts including connections from Ore/Hastings and Hampden Park/Eastbourne stations to the respective hospitals; <p>All of the above will be undertaken in conjunction with RDC, ESCC, the respective councillors and the constituency Member of Parliament.</p>



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4 : Infrastructure

Reference and Title	Policy
I1 : Improving Road Safety and Traffic Impact	<p>Improvements in safety and reductions in the speed of traffic through the village will be supported by :</p> <ul style="list-style-type: none"> i) Working with police, volunteers and ESCC in order to continue to reduce the speed of traffic through the village; ii) Ensuring that development proposals demonstrate how highway safety is secured and, where necessary, enhanced; iii) Promoting the installation of measures to slow traffic through the village, using design features in keeping with the rural nature of the parish; iv) Mitigating the negative impacts on non-motorised transport users including improvements to pedestrian footpaths and cycle ways;
I2 : Sewage System Improvement	<p>Development proposals which have undergone an independent capacity check of the parish sewer system by a qualified professional will be supported provided that any improvements required are operational before construction is commenced. This is essential due to the current identified problems of regular foul water overflow and pollution incidents in the Neighbourhood Area.</p> <p>Advocate improvements in the system by promoting, in conjunction with RDC, ESCC, the respective councillors and the constituency Member of Parliament, the extension of the local network to include all of the village and a secure power supply for the wastewater pumping station.</p>
I3 : Surface Water Drainage	<p>All developments, no matter of what size, must adopt sustainable drainage systems in accordance with Design Code 3.3 in Addendum D6 : Peasmarsh Villagescape and Design Codes.</p> <p>Planning applications must be accompanied by a SuDS statement demonstrating how this is to be achieved.</p> <p>Developments which do not comply with this policy will not be supported.</p>



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I4 : Power Supply	The issue of intermittent outages of the power supply inhibits Peasmarsh operating as a service village and creates barriers to future investment. Improvements in the system will be supported by promoting, in conjunction with RDC, ESCC, the respective councillors and the constituency Member of Parliament, improvements to the local reticulation to substantially improve the reliability of supply.
I5 : Telecommunications	<p>The limited nature of telecommunication facilities inhibits Peasmarsh operating as a service village and creates barriers to future investment. Improvements in the system will be supported by promoting, in conjunction with RDC, ESCC, the respective councillors and the constituency Member of Parliament, improvements to the local broadband and cell phone services, particularly in the parts of the parish not in the village.</p> <p>Proposals that deliver improvements to telecommunications with additional equipment locations will be supported where :</p> <ul style="list-style-type: none"> i) the applicant has fully explored the opportunities to erect apparatus on existing buildings, masts or other structures; ii) the number of radio and telecommunication masts are kept to a minimum consistent with the efficient operation of the network; iii) the development has been sited and designed to minimize the impact on the character and appearance of Peasmarsh and the AONB;
I6 : Developer Obligations	Where there is a capacity constraint in respect of any utility provision, developers must set out what changes and improvements are required and how they are to be delivered. This should be made public, included as a condition of planning approval and implemented prior to the commencement of the development.
I7 : Access to High Quality Secondary Education	Improvements to secondary education will be supported by lobbying for sustained improvements to the closest ESCC schools, including the provision of sixth form facilities at one or other.



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5 : Business and the Local Economy

Reference and Title	Policy
E1 : New Business Space Development	The development of new business space to improve the sustainability of business and provision of employment opportunities in the parish will be supported for use classes E (a), E (b), E (c) and E (g) as defined in the Town and Country Planning (Use Classes) Order 1987 as updated in September 2020.
E2 : Adaptation of Existing Buildings for WFH	<p>Development proposals for the conversion of properties for working from home will be supported.</p> <p>Proposals to create work space that involve the use of part of a building, small-scale free-standing buildings within the curtilage of a building, extensions to a building, or the conversion of outbuildings will be supported provided that the rural character of the parish within an AONB is not disturbed and subject to the following criteria :</p> <ul style="list-style-type: none"> • all activities are undertaken predominantly by the occupants of the dwelling; • additional buildings, extensions or conversions should not detract from the quality and character of the building to which they are subservient by reason of height, scale, massing, location or the facing materials used in their construction; • any employment element does not adversely impact upon road safety or substantially increase traffic volume; and • appropriate car parking is provided within the site;
E3 : Rural Building Conversion for Business Use	<p>Proposals for conversions of suitable redundant farm or other buildings for business uses will be supported, provided that :</p> <ul style="list-style-type: none"> • priority is given in accordance with RDC policy RA4; • the proposals would have an acceptable effect upon the landscape of the AONB; • the design approach is appropriate and sympathetic to the building and its surroundings; • traffic, access, landscaping and general amenity considerations are satisfied;



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<p>E4 : Promotion of Sustainable Tourism</p>	<p>Proposals that involve tourism facilities which respond to identified local needs and are of a scale and location in keeping with the rural character of the parish will be supported, provided that :</p> <ul style="list-style-type: none">• existing attractions or accommodation are enhanced; or• the supply of quality serviced and self-catering accommodation is increased; <p>and</p> <ul style="list-style-type: none">• the proposal does not result in a reduction to the parish housing stock;
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6 : Housing

Reference and Title	Policy
H1 : Housing Mix	<p>Housing development that responds to local needs by including a mix of housing in size, type and tenure with priority focused on medium and smaller homes will be supported. In particular at least 60% of dwellings should be 2 bedroom with approximately 20% 1 bedroom and 20% 4 bedroom. All should be affordable homes.</p> <p>Smaller homes with future expansion designed in will be supported.</p>
H2 : Rural Affordable Housing Sites	<p>Affordable housing sites delivered in accordance with RDC policy LHN4 will be supported subject to detailed requirements of national guidelines and other policies in this Plan being met.</p> <p>In all cases, a legal agreement will be required to ensure that the affordable housing accommodation remains available to meet local housing needs in perpetuity, and that people with the greatest local connection are given highest priority in both initial and future occupancy.</p>
H3 : Conversion of Rural Buildings to Residential Use	<p>Planning applications for conversions of suitable redundant farm or other buildings to residential use will be supported, provided that :</p> <ul style="list-style-type: none"> • priority is given in accordance with RDC policy RA4; • the proposals are consistent with protecting the character and landscape quality of the High Weald AONB; • the design approach is appropriate and sympathetic to the building, surroundings and wider context; • traffic, access, landscaping and general amenity considerations are satisfied;



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7 : Site Allocation

Reference and Title	Policy
S1 : Development Size	<p>Developments no larger than 10 dwellings will be supported whereas larger developments will not unless it can be shown that :</p> <ul style="list-style-type: none"> i) exceptional circumstances exist; and ii) it is in the interests of the parish stakeholders; <p>Subdivision of a large site into blocks suitable for 10 dwellings in order to circumvent this limit will not be accepted.</p>
S2 : Allocated Sites	<p>The Plan allocates the following sites for residential development :</p> <p>PM01 Flackley Ash : affordable housing site, up to 10 dwellings</p> <p>PM02 Woodside : affordable housing site, up to 10 dwellings</p> <p>PM04 Orchard Way : development boundary extension, up to 5 dwellings</p> <p>PEAL01 Cornerways : development boundary extension, up to 7 dwellings</p> <p>Developments of more than three houses shall only take place on allocated sites.</p>
S3 : Development Boundary	<p>Subject to RDC approval, the Peasmarsh development boundary is hereby extended as shown in Figure 7.3. The extent of the boundary shall not be changed without reference to Peasmarsh Parish Council.</p> <p>Any development outside of the boundary, with the exception of agricultural conversions, must comply with the guidelines for affordable housing sites. In this context affordable housing shall be let or sold at no more than 50% of the commercial rate for the particular property.</p>



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8 : Design and the Built Environment

Reference and Title	Policy
D1 : Local Setting	<p>Development must conserve and enhance the character area in which it is located. Developments that have regard to the following will be supported :</p> <ul style="list-style-type: none"> i) Designs must demonstrate how the local context has been considered and that they reflect the character and vernacular of the area using architectural variety in form and materials. ii) Innovation in design will be supported only where this demonstrably enhances the quality of the built form in a character area. iii) Development proposals must address the criteria in Design Code 3.2 in Addendum D6 : Peasmarsh Villagescape and Design Codes, as appropriate to their scale, nature and the location of development.
D2 : Placemaking	<p>Development must demonstrate a high quality of setting design, which responds and integrates well with its surroundings, meets the changing needs of residents and minimises the impact on the natural and historic environment.</p> <p>Development proposals must demonstrate how they have considered and addressed the matters in Design Code 3.3 in Addendum D6 : Peasmarsh Villagescape and Design Codes as appropriate to their scale, nature and location.</p>
D3 : New Homes	<p>Development must demonstrate a high quality of dwelling designs, which respond and integrate well with their surroundings and meet the changing needs of residents.</p> <p>Development proposals must demonstrate how they have considered and addressed the matters in Design Code 3.4 in Addendum D6 : Peasmarsh Villagescape and Design Codes as appropriate to their scale, nature and location.</p>



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<p>D4 : Energy Efficiency and Sustainability</p>	<p>The design and standard of any development is required to achieve the highest level of sustainable design, in order to reduce energy consumption and climate effects.</p> <ol style="list-style-type: none"> 1 Development proposals which incorporate the sustainable design features below as appropriate to their scale, nature and location will be supported, where such measures will not have a detrimental impact on character, landscape and views : <ol style="list-style-type: none"> i) incorporate on-site energy generation from renewable sources; ii) optimise site and house orientation in order to assist with passive solar design and any relevant renewable energy solutions; iii) use high quality, thermally efficient building materials; iv) install energy efficiency measures such as loft, draft and wall insulation and triple glazing; v) reduce water consumption through the use of grey water systems; vi) provide low carbon sustainable design and avoid or mitigate all regulated emissions using a combination of on-site energy efficiency measures [such as insulation and low energy heating systems], on-site zero carbon technologies [such as solar tiles] and, only where necessary, off-site measures to deal with any remaining emissions; vii) install lower wattage light sources; viii) provide adequate, future-proofed off-street electric vehicle charging points for each dwelling; 2 Alterations to existing buildings should be designed with energy reduction in mind and comply with current sustainable design and construction standards. 3 Alterations to existing historic assets, whether designated or not, in order to improve energy efficiency should be informed by Historic England best practice and designed to reflect Historic England's 'whole building' approach.
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<p>D4 : Energy Efficiency and Sustainability <i>continued</i></p>	<p>4 Development proposals for landscape-sensitive, small-scale community-scale renewable energy schemes that contribute towards reducing greenhouse gas emissions and carbon neutral targets will be supported where it is demonstrated through suitable site specific analysis that the proposal :</p> <ul style="list-style-type: none"> i) has regard to High Weald AONB guidance; ii) makes provision for the removal of the facilities and reinstatement of the site, should it cease to be operational; iii) ensures existing public access is not impeded; iv) does not result in the loss in use of Grades 1, 2 or 3a agricultural land;
<p>D5 : Dark Skies</p>	<p>Development proposals which include external lighting must demonstrate an essential purpose to the occupier or beneficial impact to the community and have regard to the current policies and guidelines of the High Weald AONB and RDC.</p> <p>For the purposes of this policy, ‘essential purpose’ means for safety or security.</p> <p>All lighting should be designed to minimise light spill.</p> <p>Where it can be demonstrated as meeting an essential purpose, external lighting [including temporary lighting and lighting of sports facilities] should be of a sensitive and proportionate nature. The impact of all external lighting should be minimised in terms of direction, power, colour and duration. A lighting plan submitted with the proposal should set out how this is to be achieved.</p>



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Appendix 2 Traffic Report September 2022

Introduction

Peasmarsh Parish Council purchased a Black Cat monitoring device in 2021 and started monitoring the traffic flowing in June that year.

The device is capable of monitoring traffic travelling in both directions simultaneously. It records the speed of the vehicle and its length, from which the type of vehicle is deduced. Vehicles are classed as one of bicycle / motorbike / scooter, car / small van, large van, lorry or articulated lorry. All data is collected electronically for subsequent analysis.

Monitoring Points

The first monitoring point was along Main Street opposite the Old Post Office. This is in the 30 mph zone of the village – see Figure 1, a reference map. Each monitoring session at Old Post Office covered a week and sessions were repeated every month over the period of a year, excluding December.

Further monitoring was conducted at the other end of the village, outside Two Hoots, starting in November 2021, also in the 30 mph zone. Each session again covered a week and sessions were repeated every month. It should be noted that the monitoring point at Two Hoots is co-located with that of the Vehicle Activated Sign (VAS) for speeders. The VAS is having an effect on reducing the speed of vehicles entering the village from Rye.

A monitoring point in the middle of the village – again 30 mph – proved elusive to identify until one was found in July 2022, at the west end of Brickfields by the entrance of the footpath between Main Street and School Lane. This point is 90m [98 yards] west of the junction of the Maltings with Main Street and hence the bollards in the middle of Main Street at the school crossing. These factors have the effect of slowing down traffic upon the approach but it speeds up again once past.

Work has also started [August 2022] on monitoring the traffic to and from the Jempson's campus but only incomplete information is available to date. Two week-long surveys were conducted that month at the roundabout at the entrance of Jempson's, the first on that part of Tanhouse Lane between its junction with the A268 and the roundabout and the second at the exit of the roundabout towards the rest of Tanhouse Lane. Main Street is 40 mph at its junction with Tanhouse Lane but the lane itself is de-restricted.

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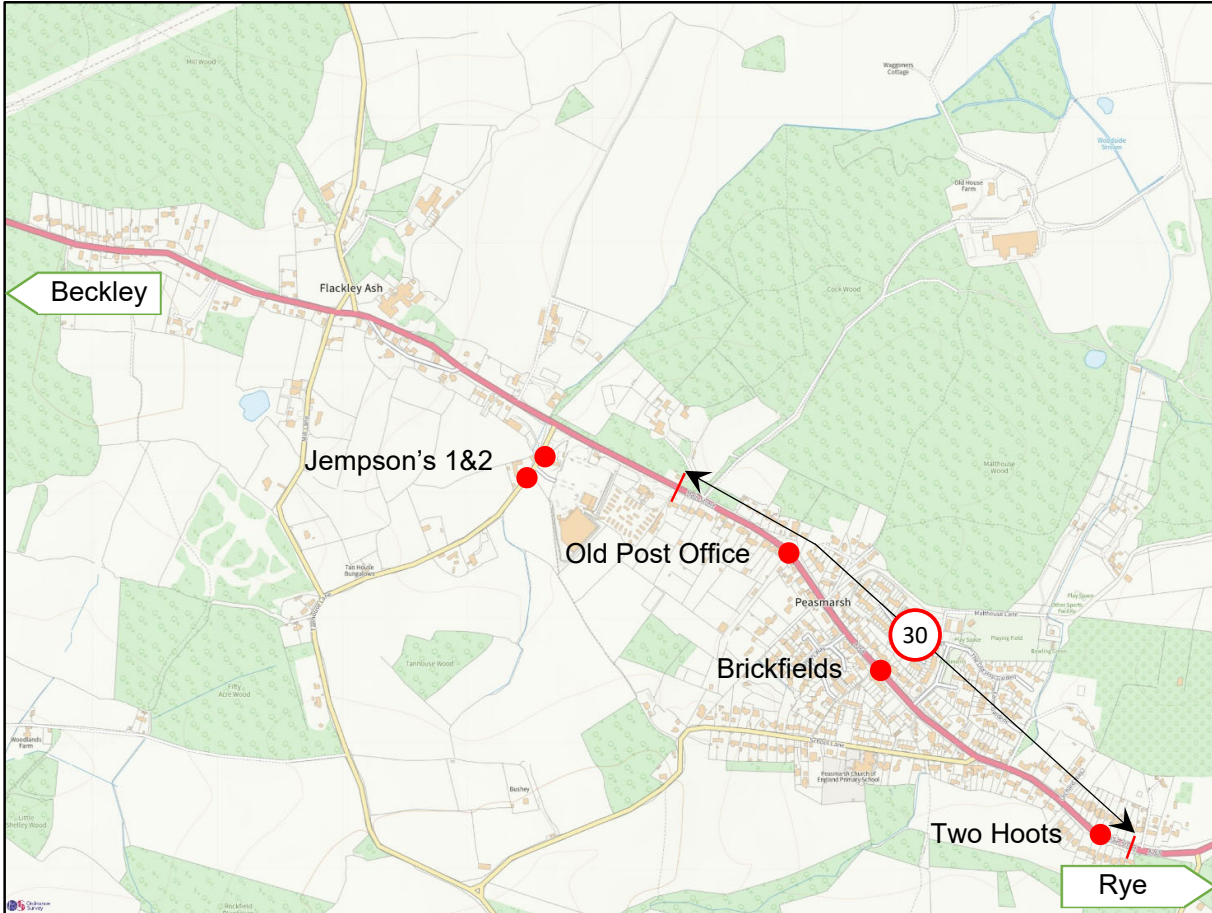


Figure 1 : Reference Map

Old Post Office

This is the monitoring point with a full year's data. Figure 2 shows the data from a recent week, in July 2022, presented in graphical format : the flow for each 30 minute segment of the day is presented in each direction of travel. Each column section is coloured according to the speed measured. Green is at or below the 30mph speed limit, yellow is between 31 and 35mph, blue is between 36 and 44mph and red is 45 mph and above.

The data is typical of the data throughout the year. It was noted that there was more traffic leaving the village heading west, towards Beckley, than that entering from the west. Nearly 70% of the traffic exceeded the speed limit and the speed at or below which 85% of the total volume of traffic flowing [85th percentile speed] was 35.5mph westwards and 34.3mph eastwards.

Figure 3 shows the same data plotted against speed, again for each direction of travel.

This shows that the volume and speed of traffic leaving the village was greater than that entering.

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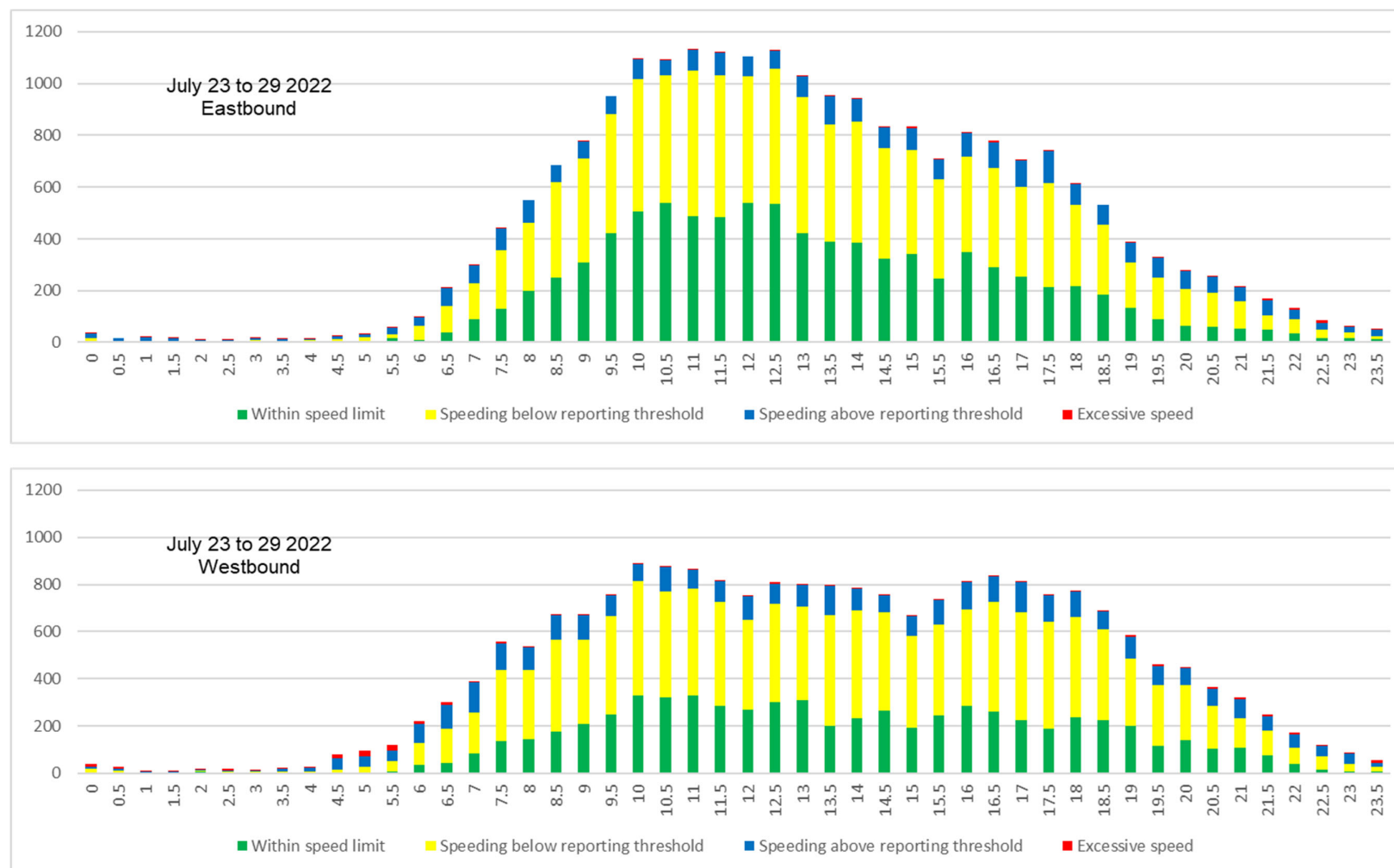


Figure 2 : Old Post Office Traffic Flow against Time of Day



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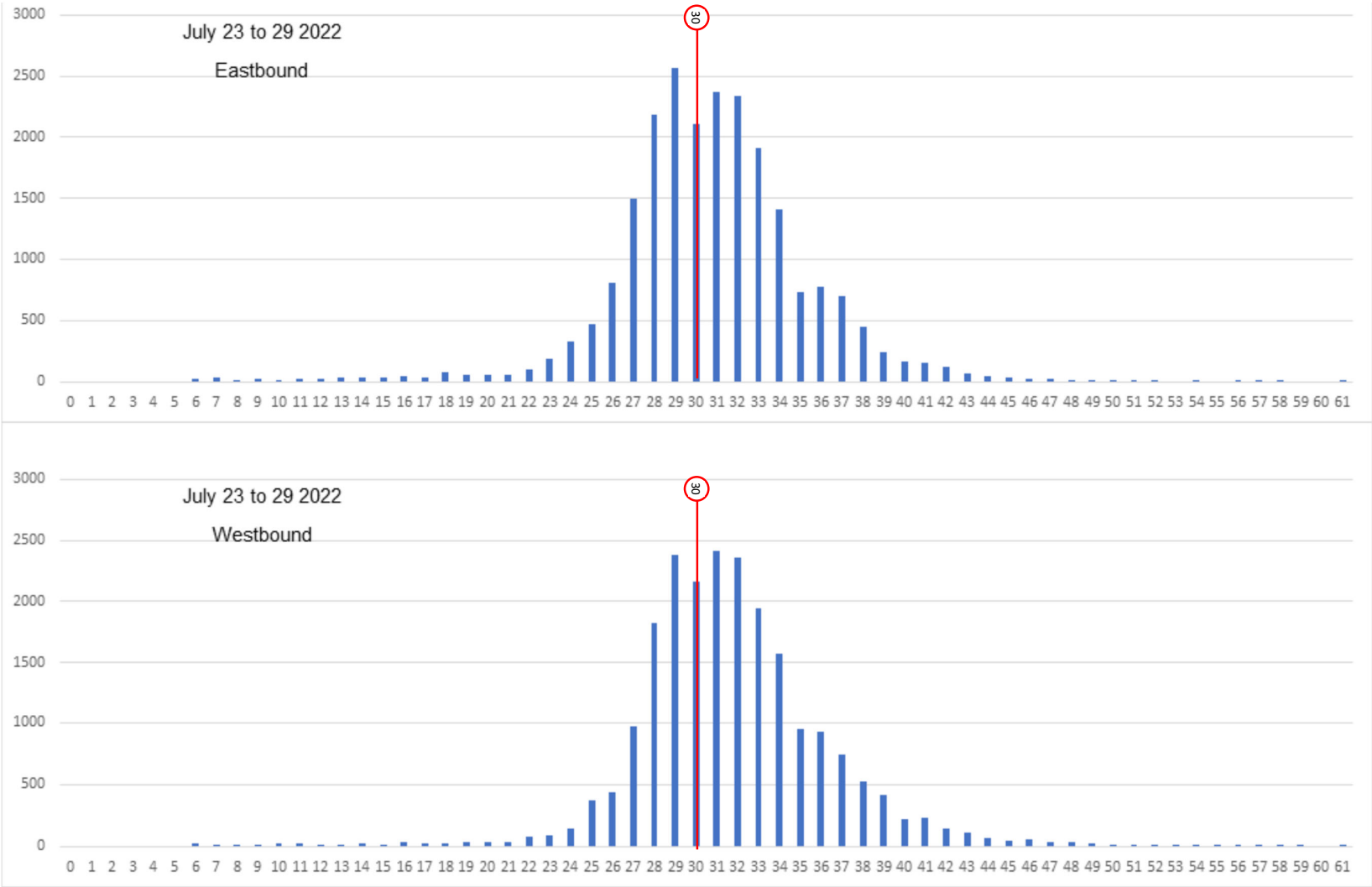


Figure 3 : Old Post Office Traffic Flow against Speed



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Table 1 shows the percentage increase in the volume of traffic, based upon the minimum traffic flow recorded, for each month, passing the monitoring point over a year :

Dates	% Eastwards	% Westwards	Remarks
15-01-22 to 21-01-22	0	0	minimum volume
11-02-22 to 17-02-22	7.8	4.8	
11-03-22 to 17-03-22	4.9	2.8	
18-04-22 to 24-04-22	19.7	19.7	
01-05-22 to 07-05-22	15.5	15.2	Bank holiday
23-06-21 to 30-06-21	19.4	16.9	
18-07-21 to 24-07-21	47.7	54.6	
05-08-21 to 11-08-21	23.0	24.9	
25-08-21 to 31-08-21	29.0	35.1	Bank holiday
13-09-21 to 19-09-21	19.6	20.8	
08-10-21 to 14-10-21	10.2	7.6	
08-11-21 to 14-11-21	6.0	4.6	

Table 1 : Percentage Increase in Traffic Volume Relative to Minimum Flow

Further analysis of the year's data was carried out for different the vehicle types, based upon the length of the vehicle. Tables 2 [eastbound] and 3 [westbound] show, for each type, the volume, the percentage of vehicles speeding and the 85th percentile speed :

Vehicle Type	% Volume	% Speeding	85% Speed mph
Bikes / Cycles / Scooters	3.6 – 8.4	34 - 38	33 - 34
Cars / Small Vans	86 - 88	45 - 54	33 - 35
Large Vans	5 - 7	41 - 53	34 - 35
Lorries	1.4 – 1.8	34 - 42	32 - 33
Articulated Lorries	0.5 – 0.6	25 - 42	32 - 33
All types	100	44 - 53	33 - 35

Table 2 : Type Analysis Eastbound

Vehicle Type	% Volume	% Speeding	85% Speed mph
Bikes / Cycles / Scooters	2.3 – 3.7	43 - 49	34 - 35
Cars / Small Vans	65 - 75	53 - 65	34 - 36
Large Vans	19 - 28	56 - 68	35 - 37
Lorries	1.8 – 2.5	41 - 56	33 - 35
Articulated Lorries	0.6 - 1	33 - 44	32 - 34
All types	100	53 - 64	34 - 36

Table 3 : Type Analysis Westbound

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Two Hoots

This is the monitoring point mounted with the VAS. Figures 4 and 5 on pages 7 and 8 are similar to Figures 2 and 3 but for this location from another recent week in July 2022.

Again, it was noted that there was more traffic volume leaving the village than entering it. There was also a bigger disparity in the volume of speeding vehicles entering the village with those leaving.

It is apparent that vehicles are speeding up before they reach the derestriction signs at both ends of the village.

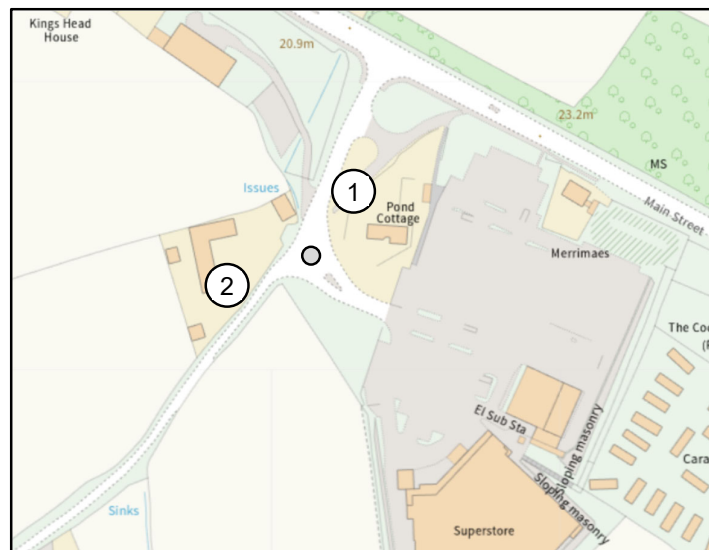
Brickfields

The monitoring at Brickfields shows that the volumes and speed of speeding vehicles is largely the same in both directions.

Jempson's Campus

This analysis is currently still in progress; however, some basic results are available.

Two week-long surveys were conducted in August 2022 at the roundabout on Tanhouse Lane at the entrance to Jempson's. The first (1) was on that part of Tanhouse Lane between its junction with the A268 and the roundabout and the second (2) was at the exit of the roundabout towards the rest of Tanhouse Lane as shown on this sketch map :



With respect to the A268 there were some 8,526 vehicles heading towards Jempson's and 9,010 vehicles heading away from Jempson's. The vast majority of this traffic would have originated from outside the parish although it is not possible to determine the proportion that entered from which end of the parish.

The traffic volume flowing along Tanhouse Lane towards Jempson's was 1,092 and away from Jempson's was 959. Further surveys and analysis of the traffic flowing along other lanes will be required in order to complete the analysis.

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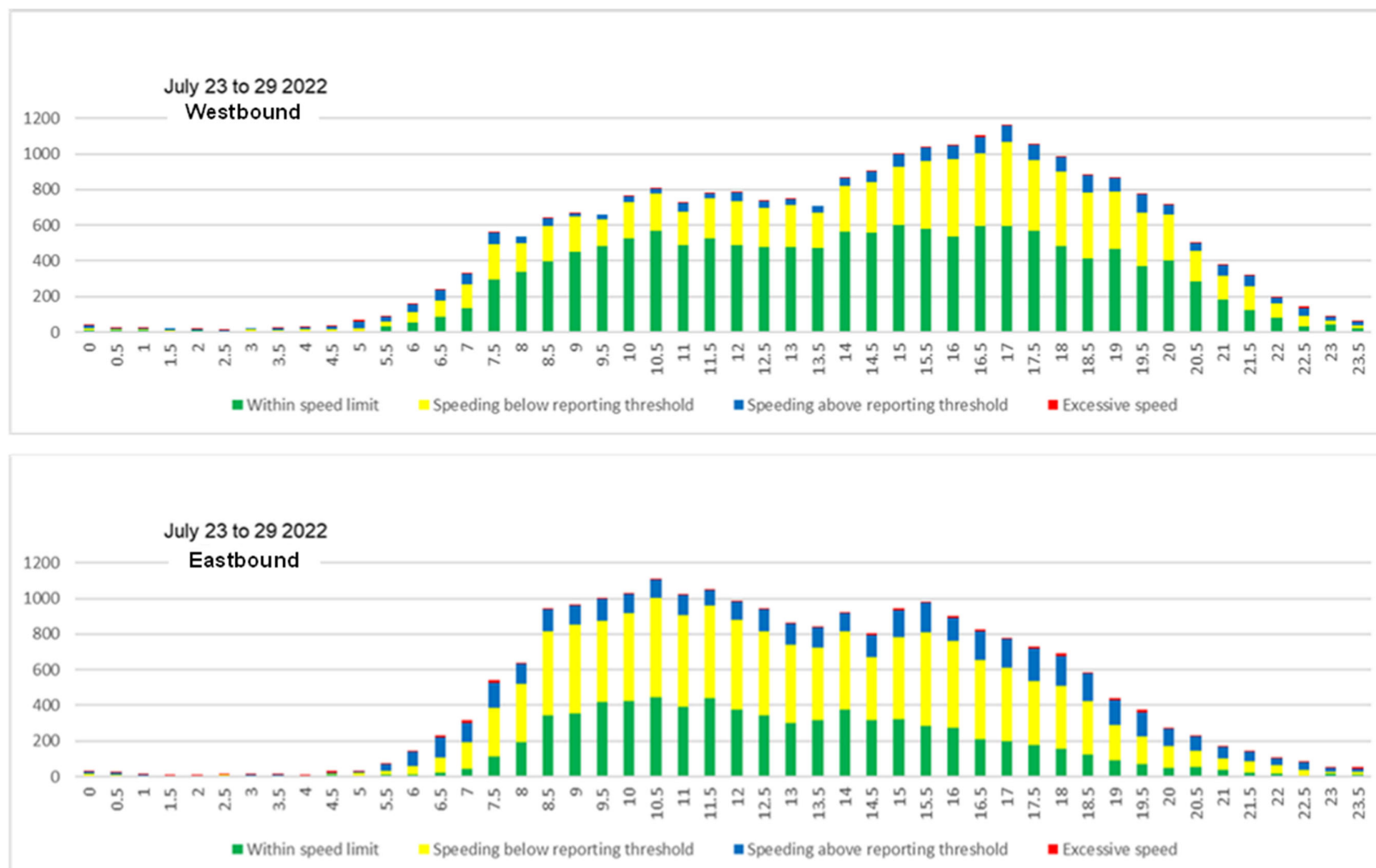


Figure 4 : Two Hoots Traffic Flow against Time of Day



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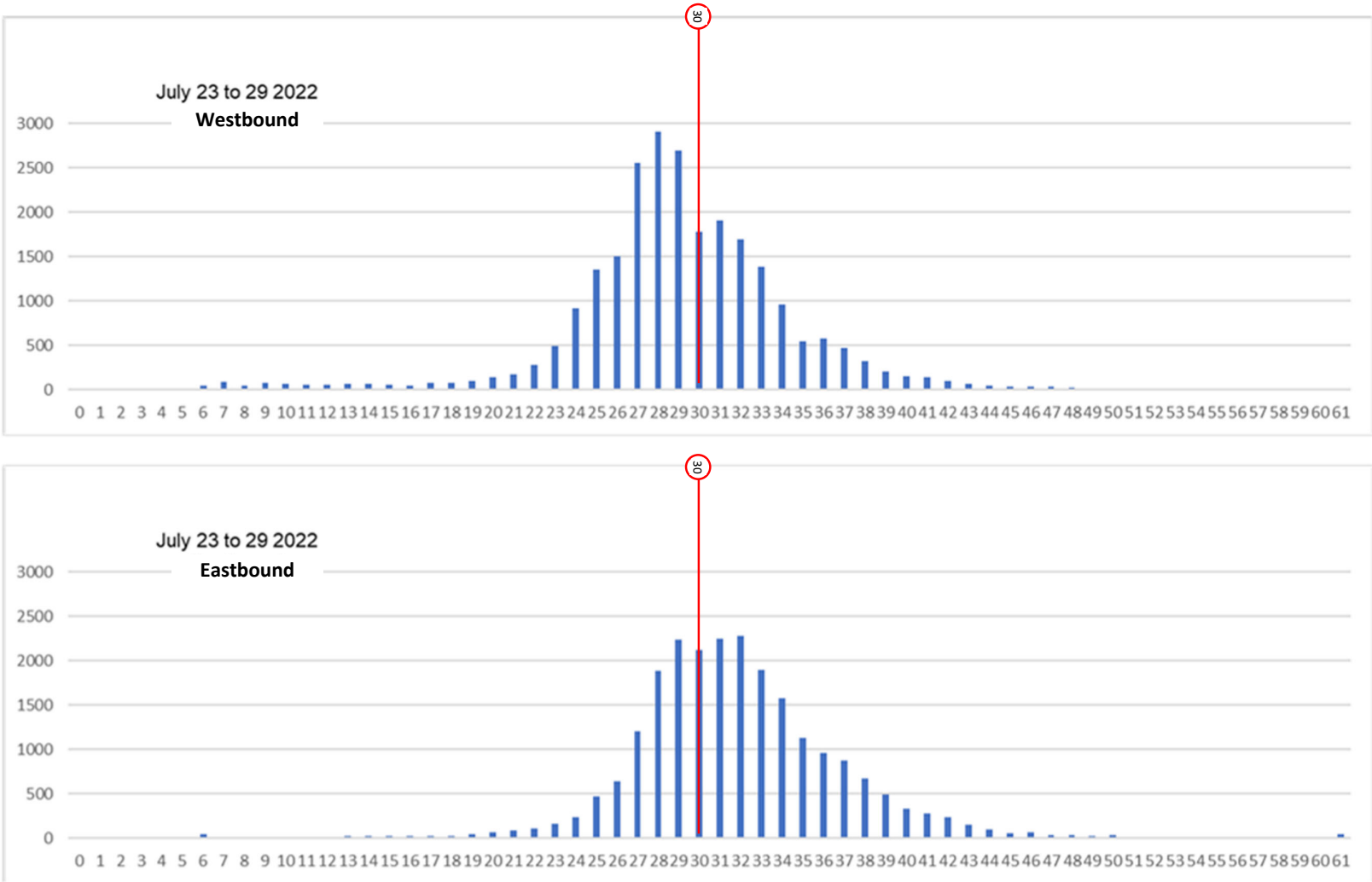


Figure 5 : Two Hoots Traffic Flow against Time of Day



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Main Street Overall

With the introduction of the third monitoring point in the middle of Main Street it is possible to determine if the volume of speeding traffic and its speed varies as it passes through the village, albeit for different one week periods. The data is provided in Annexe 1.

Figures 6 [westbound] and 7 [eastbound] on pages 10 and 11 show the data for each of the five types of vehicles at each monitoring point : percentage of total volume [left Y axis], the percentage that was speeding and the 85th percentile speed [both right Y axis].

The assumption being made when comparing data from one monitoring location with another is that over a week the general traffic flow is the same from one week to the next. However, the variation in the percentage of the volume for a specified vehicle type shows that this is not absolutely true for the three-week monitoring period required to collect all the data.

For westbound traffic passing the three monitoring points; it will be noticed that with the exception of bikes and scooters there is an increase in the percentage of speeding vehicles as they pass from Two Hoots at the start of the 30mph zone to Brickfields in its middle and on to the Old Post Office some 200 metres before its end. There is a slight variation in the 85th percentile speed.

For eastbound traffic, again with the exception of bikes and scooters, there is a drop in the percentage of speeders as they pass Brickfields but that increases as it passes Two Hoots, with a corresponding change in speed. Traffic flowing in this direction are having to slow down for vehicles turning into the Maltings and the narrowing of Main Street due to the school crossing bollards.

There may be a similar effect for traffic travelling the other way but they speed up again after passing the junction towards the monitoring point.

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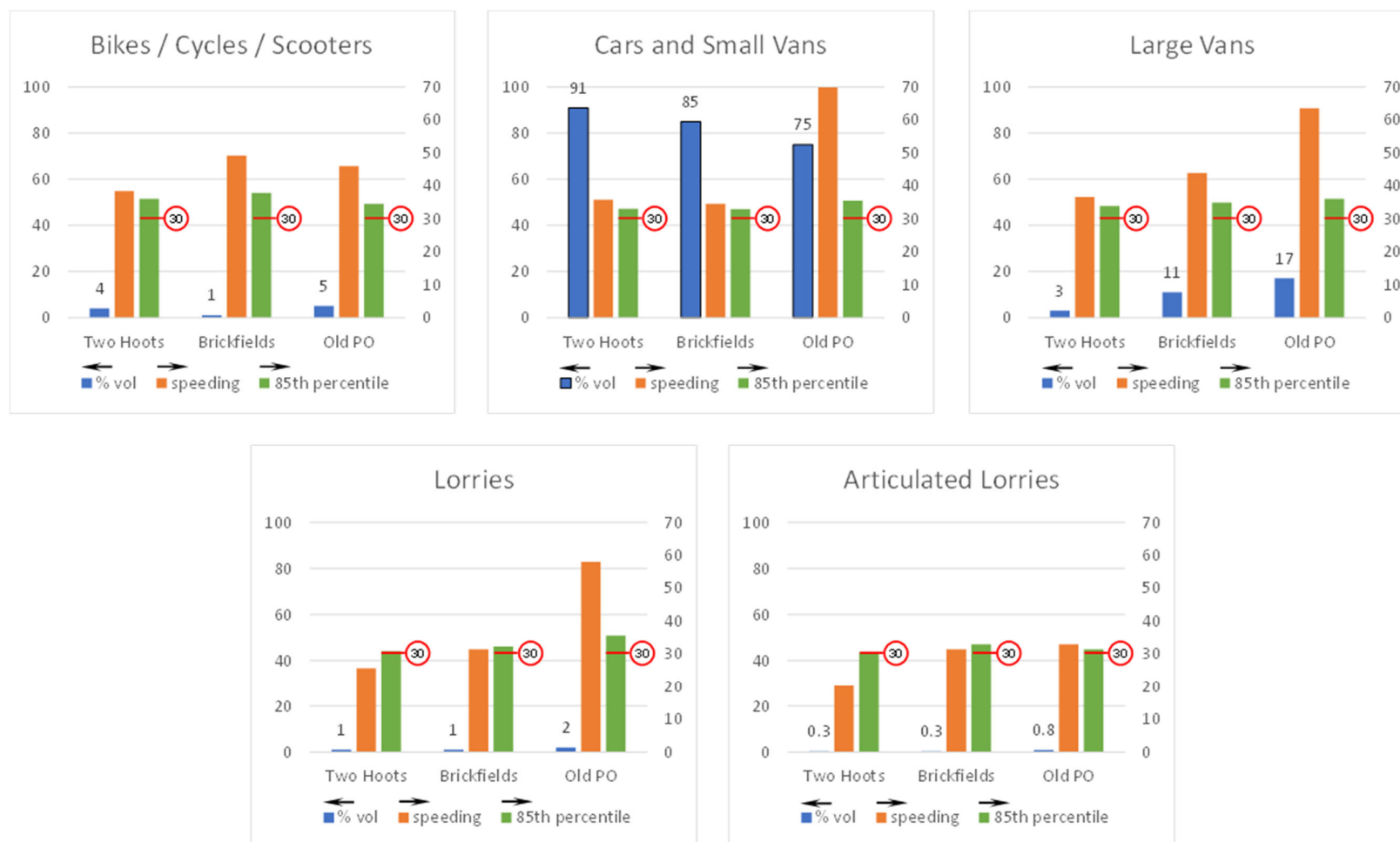


Figure 6 : Main Street Analysis by Vehicle Type Westbound

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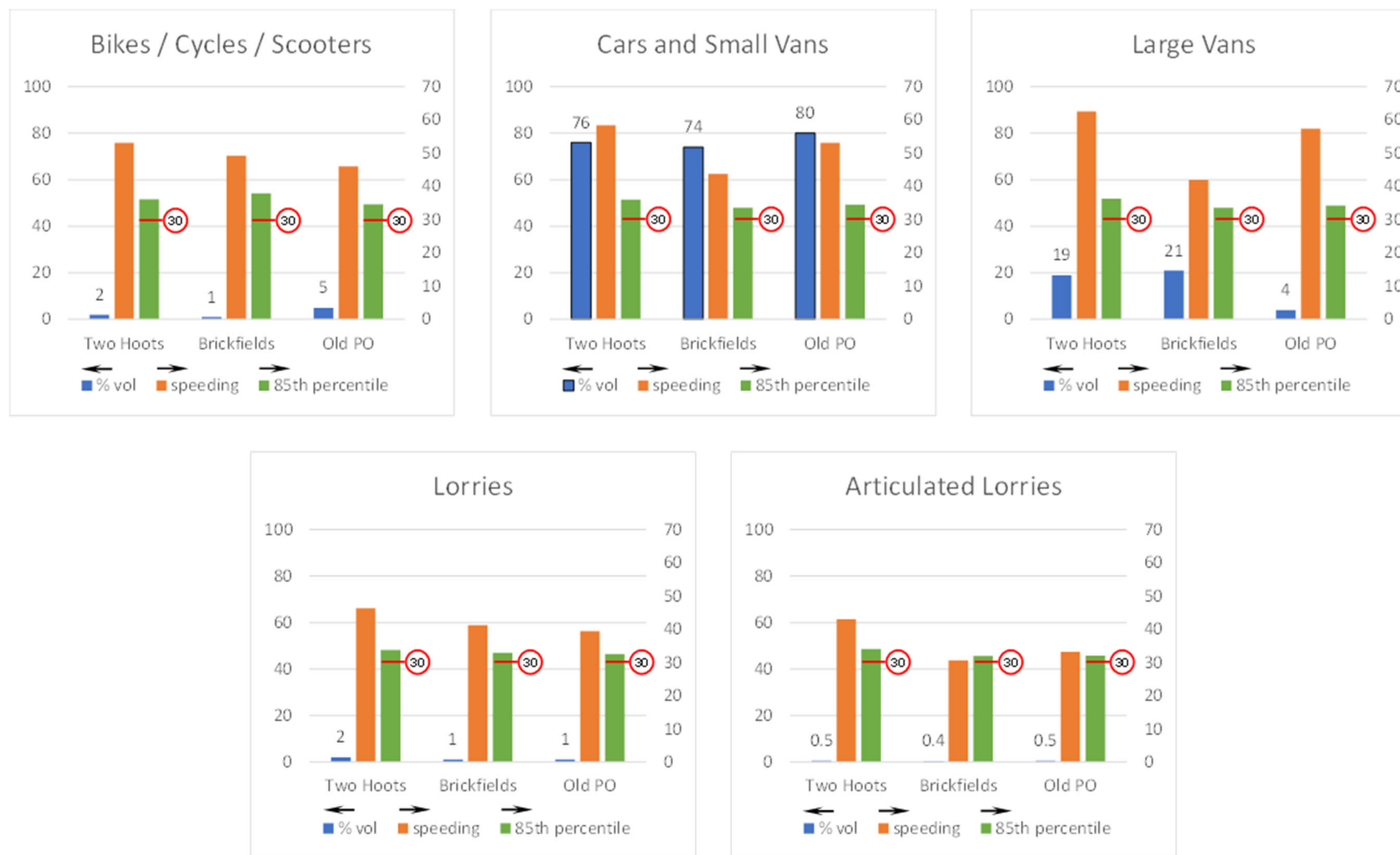


Figure 7 : Main Street Analysis by Vehicle Type Eastbound



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Annexe 1 : Main Street Data July 2022

Location	Vehicle Type	Total Volume	% of volume	% Speeding	85 th %ile
Two Hoots Westbound	All types	24,370	100	35.8	33.0
07 to 13 July 22	Bikes / Cycles / Scooters	975	4	38.4	36.0
	Cars / Small Vans	22,199	91	35.8	33.0
	Large Vans	833	3	36.6	33.9
	Lorries / Box Vans	269	1	25.7	30.9
	Articulated Lorries	94	0.3	20.2	30.6
Eastbound	All types	23,020	100	58.8	36.0
07 to 13 July 22	Bikes / Cycles / Scooters	560	2	53.1	36.1
	Cars / Small Vans	17,541	76	58.4	36.0
	Large Vans	4371	19	62.5	36.3
	Lorries / Box Vans	434	2	46.3	33.7
	Articulated Lorries	114	0.5	43	34.0

Brickfields Westbound	All types	26,323	100	35.8	32.9
15 to 21 July 22	Bikes / Cycles / Scooters	344	1	49.2	37.9
	Cars / Small Vans	22,486	85	34.6	32.9
	Large Vans	3037	11	43.9	3.9
	Lorries / Box Vans	373	1	31.4	32.3
	Articulated Lorries	83	0.3	31.4	32.9
Eastbound	All types	24,724	100	42.5	33.5
15 to 21 July 22	Bikes / Cycles / Scooters	550	2	41.9	37.9
	Cars / Small Vans	18,378	74	43.8	33.5
	Large Vans	5,326	21	42	33.6
	Lorries / Box Vans	362	1	41.2	32.9
	Articulated Lorries	108	0.4	30.6	31.9

Old Post Office Westbound	All types	21,691	100	59.5	35.5
23 to 29 July 22	Bikes / Cycles / Scooters	1,117	5	46	34.6
	Cars / Small Vans	16,205	75	70	35.5
	Large Vans	3,785	17	63.6	36.0
	Lorries / Box Vans	405	2	58	35.6
	Articulated Lorries	179	0.8	33	32.5
Eastbound	All types	22,433	100	51.8	34.2
23 to 29 July 22	Bikes / Cycles / Scooters	3,210	14	46.7	34.6
	Cars / Small Vans	17,889	80	53.1	34.5
	Large Vans	931	4	51.4	34.2
	Lorries / Box Vans	282	1	39.4	32.5
	Articulated Lorries	121	0.5	33.1	32.0



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Appendix 3 : Transport and Infrastructure Analysis

Introduction

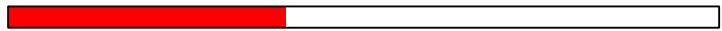
There is much recorded in the Plan about the state of the existing infrastructure within Peasmarsh and the multiple issues with it as it stands, even without the problems that will arise if further development takes place without prior improvement.

However, there is also a lot of unrecorded material that has been received, often by word of mouth during public consultations. In addition, there are the results of the 2021 survey. This short report seeks to redress the balance.

Public Transport

The bare results of the 2021 survey tell the basic story :

Bus Services : 39% adequate



Most complaints were about the timetable : the inadequate frequency, the lack of buses at either end of the day, the poor coordination with other services, particularly the trains, and finally their reliability. Yet another bus was withdrawn at the start of November 2022.

Some of the problems can be seen from this current timetable :

Weekdays to Rye							
Peasmarsh	07:26	08:23		10:29	12:29	14:29	16:29
Rye	07:38	08:35		10:41	12:41	14:41	16:41
Weekdays from Rye							
Rye	08:39	09:40	11:40	13:40	15:45	17:17	19:05
Peasmarsh	08:48	09:49	11:49	13:49	15:54	17:26	19:14

Notes : Buses in yellow are out of sync with train arrivals and departures

Buses in amber are marginally out of sync with train arrivals and departures.

Saturday to Rye							
Peasmarsh				10:29	12:29	14:29	16:34
Rye				10:41	12:41	14:41	16:46
Saturday from Rye							
Rye		09:40	11:40	13:40	15:40	17:17	
Peasmarsh		09:49	11:49	13:49	15:49	17:26	

The trains from Rye arrive and leave at just after a quarter before the hour, one for Ashford and one for Hastings. If the bus is on time then some of the time there is a chance of catching a train – if you possess a ticket – but for much of the day there is nearly a one hour wait for the next train.

There is no Sunday or Bank Holiday service.



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Anecdotally, people report late running buses or buses just not appearing at all. The Freedom Pass is seen as pointless because the system is so poor. Without a good quality and regular bus service as intended by the government in its national Bus Back Better strategy people will never adopt a bus based lifestyle. It is false logic to say that people don't use the buses so therefore there is no need to improve the service : change must be led by good quality service.

One of the repeated issues raised is getting to the doctor's surgeries – and back again.

The new timetable is better in that sense if going to the Rye Medical Centre but it still takes one hour twenty minutes to get back off the bus in Peasmarsh. Those travelling to the Northiam surgery face a 2½ hour round trip.

There is a similar situation getting to the Conquest hospital in Hastings via Rye – except that the hospital dictates the time of the appointment. There are five useful buses to the Conquest from Rye but the patient has to get to Rye and then wait for the connection. Only 4 of the five are of possible use as one has no connection from Peasmarsh. The journey takes over 90 minutes but driving takes 30 minutes at most.

A final point is that because travel distances are much greater in rural areas, poor and disabled people without access to personal cars are more isolated without good quality bus services than similar people in urban areas.

Road Safety

Whilst Peasmarsh has some adjoining side roads, it is primarily a linear village with the A268 running along its core. The resulting problems of noise and traffic have been a long running grievance and led to the Parish Council setting up a speed monitoring group within the village – see Appendix A2.

This found that no fewer than 69% of all vehicles break the speed limit when travelling through the village. As well as adding to noise levels this leaves people uncomfortable with walking and cycling through the village [there are currently no cycle lanes]. During the parish consultation the single most popular safety measures proposed within the village were an extension of the 30 mph zone and traffic calming measures on the main road. Slower, safer traffic would also encourage parents to walk their children to school and reduce congestion in School Lane.

PPC should continue to push for proper measures to control traffic speed, which will increase pedestrian safety and promote walking and cycling in Peasmarsh, in line with the NPPF and RDC aspirations to promote green living.

Utilities

The results of the 2021 survey showed that stakeholders were far from happy with the utilities provided in the parish :

Utility Services : 61% adequate



Most of the concerns related to drainage – both sewage and surface water, electricity supply and telecommunications.

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Clean Water Supply

Although there were no issues raised during the public consultation with respect to water supply, the clean water supply depends upon a power supply which is more problematic and liable to failure. What is needed is for the water supplier to have adequately fuelled standby generators plus contingency plans in place to supply the parish in the event of power failure and not to make it the responsibility of residents to travel to Battle – a 21 km [13 mile] trip each way – to pick up supplies of bottled water as has happened in the past.

Foul Water Disposal

Attempts by the PNDP steering group to obtain information on the foul water system from Southern Water [SW] have had only limited success, with information being provided grudgingly and without detailed evidence.

In essence its view seems to be that there are no significant problems and any flooding incidents are the results of self-inflicted failures of care by its customers. This runs counter to the lived experience of the residents of the village, particularly those unfortunate enough to live in locations prone to foul water flooding :



Two cell phone pictures taken of the same event when sewage was lapping at the back door of a house. Two more images are shown on the next page.

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Frame grabs from cell phone videos of two separate incidents. On the left sewage is erupting from close to an inspection chamber. On the right sewage is gushing out with some considerable force from the underground sewage main.

Anecdotally, people talk of foul water backing up in their toilets – even though their private drains to the sewer has been proven to be free of blockage – and explosive events coating toilet walls with excrement. What the parish is lacking is a central reporting system for these events so that an evidence database can be built up. This is addressed in the Plan.

There have also been informal ‘chats’ with SW workers when at the pumping station. It is reported that, in their view, there is no spare capacity at the station.

As is discussed in Section 4.3.4 of the Plan, the key issues are :

- the limited nature of the network, only part of the village having access;
- the inability of the system to cope with surface water even though SW accepts that the older properties in the village have combined systems;
- the capacity of the system :
 - in absolute terms;
 - with respect to surface water from combined systems;
 - from the pumping station and onwards, including Iden WTW;

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Limited Network

The limited nature of the sewer network is contrary to the RDC Core Strategy : *'Foul sewerage should be by connection to the public mains system. Only exceptionally will other provision be allowed ...'* [paragraph 13.28].

Absolute Capacity

The majority of the sewer network is 150mm Ø.. It is only the relatively short section from the junction of School Lane and Main Street to the pumping station which is in larger diameter pipe.

Annexe 1 to this appendix is a short discussion document on what the capacity of a 150mm Ø might be. It is not definitive but it brings into question whether the existing sewer on Main Street is of sufficient capacity on the basis of the system being a truly 'foul only' network, let alone one with a combined content.

Combined System

There is no doubt that the older dwellings in the village have combined systems as can be seen in this image of a typical earlier chamber :



Typical Combined Sewer in Peasmarsh

The issue is probably best illustrated by the recent [December 2022 and January 2023] incidents in the Maltings at what is labelled on the official SW map as chamber 0608 close to the junction with Woodlands Close.

Both incidents were serious because of the proximity of the surface water drain in the middle of the road [clearly seen in the left hand picture over]. On January 16, following an overnight rain event, the chamber cover was partially lifted and sewage was being forced up at least 150mm [6 inches] above the road, if not 200mm. The caption of the pictures have a link to a short video of the incident. All of the effluent was flowing into the surface water system and hence the stream and river.

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The incident may or may not have been because there was a downstream blockage [no feedback was provided by SW] but what it does demonstrate is the extent of surface water in the foul system. This not really surprising when it can be readily seen on the SW map that 38 of the dwellings upstream of the chamber are of an era where combined systems were installed.

Annexe 2 to this appendix sets out the basic data on a short section of the network near chamber 0608 and that too brings into question whether the sewer is fit for purpose.



Major Foul Sewer Overflow 16/01/23 [SW Incident 4475539]
[see also the [short video](#) taken just before daybreak]

Pumping Station and Onwards

It is not possible to be definitive about the capacity of the Peasmarsh WPS but is worth noting that SW state that the system does have attenuation tanks even though it couldn't say what the capacity of them is, nor where they are located.

Clearly the station and the pipeline to Iden WTW are not able to cope with more than a 'foul water only' load as is evidenced by the pollution created when the overflow discharges.

When SW undertook a Baseline Risk and Vulnerability Assessment for the Iden wastewater treatment works in 2020, five risk criteria were found to be 'very significant' : pollution risk, storm overflow risk [2020 and still in 2050] and nutrient neutrality [2020 and still in 2050]. This confirms that the performance of the wastewater system is potentially below the minimum threshold but there is no mention of remedial investment in SW's long-term plan.

Despite all of the above, the company asserts that adding another 45 dwellings to the network would not overload the system.

It is worth noting that the water industry is normally regulated by 5-year investment programmes. As a result, the timing of future housing development may be impacted by the financing of any sewage system upgrades required.

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Surface Water Drainage

Peasmarsh is at no significant risk of river flooding, however its geological make up and position in the High Weald means the village has a long history of surface water flooding. In many ways, the clue is in the name! Over 50% of the suggestions to improve the village utilities in the public consultation cited “better drains” as their first priority.

Heavy rainfall [which is expected to increase in frequency and intensity in the future due to climate change] has resulted in the activation of old discharge routes both above and below ground. Heavy rainwater runs straight off the top of the clay soil and results in significant surface water flooding in certain areas of the village. These areas have been identified as part of the infrastructure plan for the village.



Typical flooding of the Old Hop Gardens following rain event

This flooding also becomes focused on highways, due to the faster run-off from the hard surface adding to water coming off the fields and sideroads so that locations and properties along the A268 at its lowest points have been inundated several times due to gullies being overwhelmed [particularly where these have not been maintained]. In addition, as noted above, the foul water sometimes mixes with surface water during such flooding episodes to make the experience even more noxious for the unfortunate villagers who suffer from it.

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Tanhouse Lane close to the A268 Junction following rain event.



Internal Flooding of a House on the A268 near Mill Lane following rain event



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The internal flooding shown on the previous page is particularly significant as the government's flood map doesn't show any past flooding in the vicinity and the location is at the top of Flackley Ash hill. Surface water from the A268 appears to flow south into the properties instead of flowing north and away down to the river. There is reported to be a culvert under the road to deal with this but it clearly isn't working.

Due to the need to retain Peasmarsh as a rural village within the AONB, and in order to obtain the climate change benefits of a clustered settlement, it is not possible to have developments outside the vicinity of the existing village, even though there are areas elsewhere in the parish with lower flood risks.

Electricity and Gas Supply

While all areas of Peasmarsh have mains electric power, the parish does suffer from frequent, if irregular, power failures. When this was discussed with UK Power Networks [UKPN], the providers, the reason became clear; most areas of the village are on a single line network structure rather than a ring and therefore have no alternative routing when there is a network issue.

This has consequences for parish businesses, who have extra costs to provide alternative power supplies as backup to the mains and to the increasing number of residents who are now working from home on a part or full-time basis.

It also leads to knock-on effects in other infrastructure areas such as telecommunications and pumping stations, the failure of which may, in turn, shut down other small firms. As the need for electricity grows due to electric vehicles and heat pumps, this lack of redundancy may become a serious inhibitor to rural businesses in areas such as Peasmarsh over the period to 2039.

At the same time UKPN has confirmed it is suffering from a shortage of network capacity and skilled engineers, so it is not clear how long it will take to meet new demand in advance, or to install redundancy to prevent outages from occurring. It is therefore essential that adequate power is available in advance of new developments being undertaken.

Gas is available to most properties in the village and has not been raised as an issue in the parish consultation.

Telecommunications

Rural locations such as Peasmarsh are much more dependent on communications via mobile phone and broadband than urban areas as the difficulties of communicating by any other means are much greater.

It is known that a large number of people in the village are elderly and there are a substantial number of other people who are based or work from home. For many of these people a mobile phone is essential, yet mobile phone coverage is patchy, often dependent on the network used and can be very poor outside the village centre.

One is told of people in the village [where coverage is supposed to be best] who have to place their cell phones in strange places [e.g. 'half way up the stairs'] just to be able to receive calls. Away from the village, many people just cannot get any signal in the house and even outside the coverage is poor.



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One would think that WiFi calling [also known as VoWiFi] would be the answer in this situation – all the main providers offer the service – but, of course, that requires a good broadband service – see below.

The broadband picture is similar : in the village superfast broadband [FTTC] is available but away from it the speeds are sometimes only about 10 Mbps – OFCOM's minimum acceptable speed.

Further problems are caused by the lack of redundancy of power lines and the failure to have alternate means of power for mobile phone masts when mains power fails.

Health Services

Planning and development should enable and support healthy lifestyles, targeting identified local health and well-being needs – for example, through the provision and maintenance of safe and accessible green infrastructure with increased access to healthier food, allotments and layouts that encourage walking and cycling.

Access to health services such as GP's and hospitals via public transport should be available by suitable bus services and community transport schemes.

Hospitals

Hospital services for Peasmarsh are provided by the East Sussex Hospital Trust [ESHT]. Its last CQC overall rating on 27/02/2020 was 'Good'.

The main ESHT hospitals are the Conquest, located in the outskirts of Hastings and about 30 minutes by car from Peasmarsh, and Eastbourne District General Hospital [EDGH] in the outskirts of that town and about an hour away by car. Each has surgical and medical wards and specialist units, a 24 hour Emergency Department and a full range of diagnostic services. The other important hospital in the group is Bexhill.

The issue is that different specialisations are at one or other hospital so one may have to attend EDGH even though the Conquest is much closer.

There is a community hospital in Rye, 4 km [2½ miles] from Peasmarsh village. It is owned and operated by a charitable community trust and therefore outside of the NHS but it works with the NHS which offers intermediate care, palliative care and some day care services from it. Daily medical cover is provided by the local GP practice which is based on the same site as the hospital.

A new 60-bed extension and development of the hospital is currently being undertaken on the site. When complete, this new facility will provide significant extra care home services for the residents of Rye, Winchelsea and the surrounding villages.

General Practitioners

Doctors' surgeries are available at Rye Medical Centre [in the grounds of Rye hospital], Ferry Road Medical centre in Rye and at the Northiam/Broad Oak surgery to the west of the parish. The nearest is 4 km [2.5 miles] from Peasmarsh village and all are within an 8 km [5 mile] drive of it.



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This means that the population of Peasmarsh is already very unlikely to have worse access to a GP than the ESHT area, which has on average 10,940 people per practice¹. Any additional surgery is therefore very unlikely to be funded or supported by the NHS.

A third of respondents to the parish consultations reported a desire for more access to local doctors but this is at odds with the experience of Rye Medical centre in running local surgeries in the Parish.

Before the pandemic, occasional surgeries were held in many of the outlying villages, including Peasmarsh, but none of them were very well supported. The one in Peasmarsh was initially once per week but it was never very well supported – no more than 2 or 3 appointments per session at best – and was downgraded to once per month. The arrival of Covid closed all of these arrangements and, in Peasmarsh, it has never reopened.

The doctors found the outlying surgeries very inefficient for many reasons and it is unlikely that they will be re-established.

Dentists

There are 2 dental practices in Rye and another at Northiam, all within an 8 km [5 mile] radius. None are currently understood to be taking NHS patients.

Pharmacies

All of the GP surgeries are dispensing centres and, relevant to Peasmarsh, the Jempson's campus includes a pharmacy.

Care Homes

The parish is well situated in respect of care homes, with a 24 bed care home in the parish at Peasmarsh Place which received a CQC report of 'Good' in 2022 at which time, of the full capacity, 16 beds were occupied.

Other than the care facility being developed in the grounds of Rye hospital, there is a 35 bed care home at Broad Oak and smaller ones at Rye and Camber. In addition, 38 further care homes are recorded on Google within the Hastings and Bexhill urban area, less than 20 miles from Peasmarsh.

On the Rye hospital site there is a supported housing unit and early work has started on the previously mentioned 60 bed extra care unit which will create additional facilities.

Public Transport Access to Health Services

The problem with access to health services is often linked to the poor provision of public transport in the parish, particularly in respect of accessing Rye Hastings/Bexhill and Eastbourne.

Education

Peasmarsh primary school was well supported by respondents during the parish consultation. Should the expansion of the school become educationally necessary, this would be supported by the Plan.

¹ Data from NHS Digital



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Secondary education is seen as more of a problem, with many parents preferring to send children out of county to Tenterden in Kent where there is a grammar stream as well as access to an internal 6th form. Rye College has no 6th form and nor does Robertsbridge Community College so children remaining within East Sussex have to travel to Bexhill if they wish to attend one. Providing a 6th form at Rye or Robertsbridge would be a step forward in helping parents chose more local schools.

Conclusion

This appendix reveals that Peasmarsh is currently NOT well served by infrastructure and changes are needed to help those who live, work and visit the parish. The case for these changes is outlined in detail in Section 4 of the Plan. The Plan proposes that the parish council sets up a reporting structure to allow ongoing infrastructure incidents and problems to be tracked over time.

The Plan also proposes a basic principle for development within the village framework. Developers should work on the sites allocated and within the parameters laid out in the Plan to identify infrastructure problems in each location, seek solutions and commit to delivering them in advance of any housing as a condition of planning approval.

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Annexe 1 : Sewer Capacity

The 150 Ø sewer on Main Street just before it joins the School Lane sewer receives effluent from about 200 domestic properties plus a pub and the Memorial Hall.

Building Regulations Part H – which, *inter alia*, sets the foul water drain size for developments – gives some indication of sewer sizing. A basic assumption is that the pipes should be designed for no more than 75% proportional depth [which is the equivalent of ~ 80% of full cross-sectional area]. That seems an appropriate design margin.

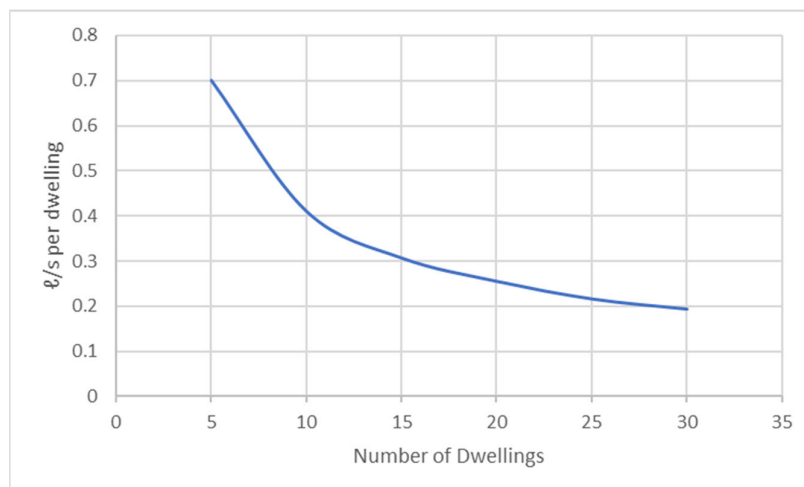
Diversity is an important concept in determining any cumulative load. Loads do not normally all peak at the same time so the peak load of the composite system will inevitably be less than the sum of the individual peak loads.

The more loads connected to a system the higher the diversity and the lower the total peak load is relative to the sum of the individual peak loads. This can be seen in Table 5 of Part H where, for design purposes, the peak load for a foul only system from one dwelling is 2.5 l/s but that for 30 dwellings is only 5.8 l/s :

Table 5 Flow rates from dwellings

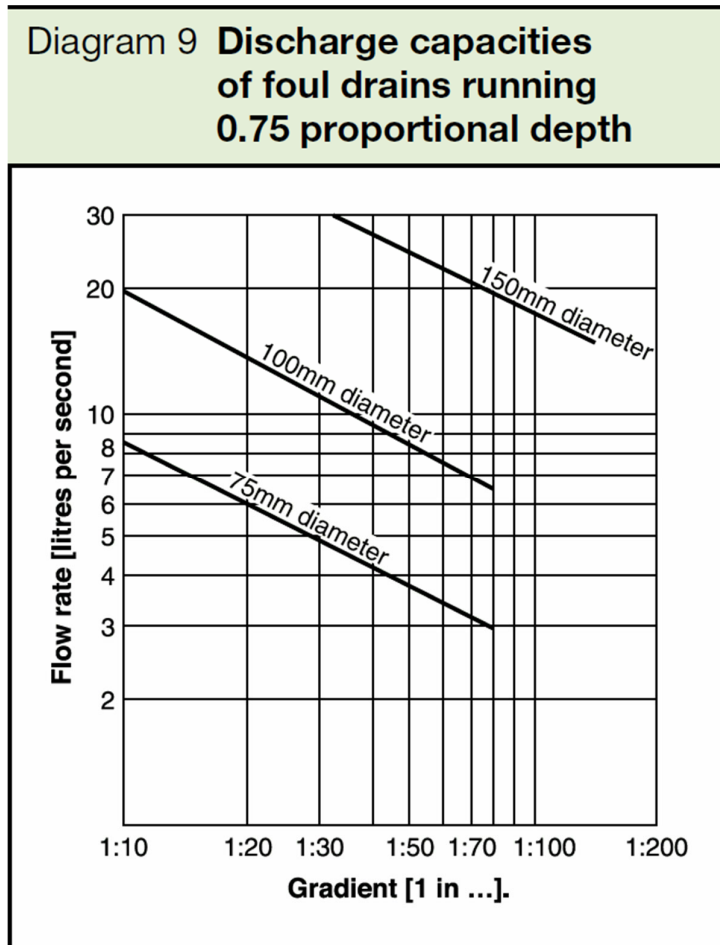
Number of dwellings	Flow rate (litres/sec)
1	2.5
5	3.5
10	4.1
15	4.6
20	5.1
25	5.4
30	5.8

The data asymptotes to about 0.18 l/s per dwelling for a large number of dwellings :



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What is not known is the slope of the main sewer but a typical figure would be 1:100. Diagram 9 of Part H shows that the permitted flow rate for a 150 Ø sewer at a gradient of 1:100 is about 18 l/s :



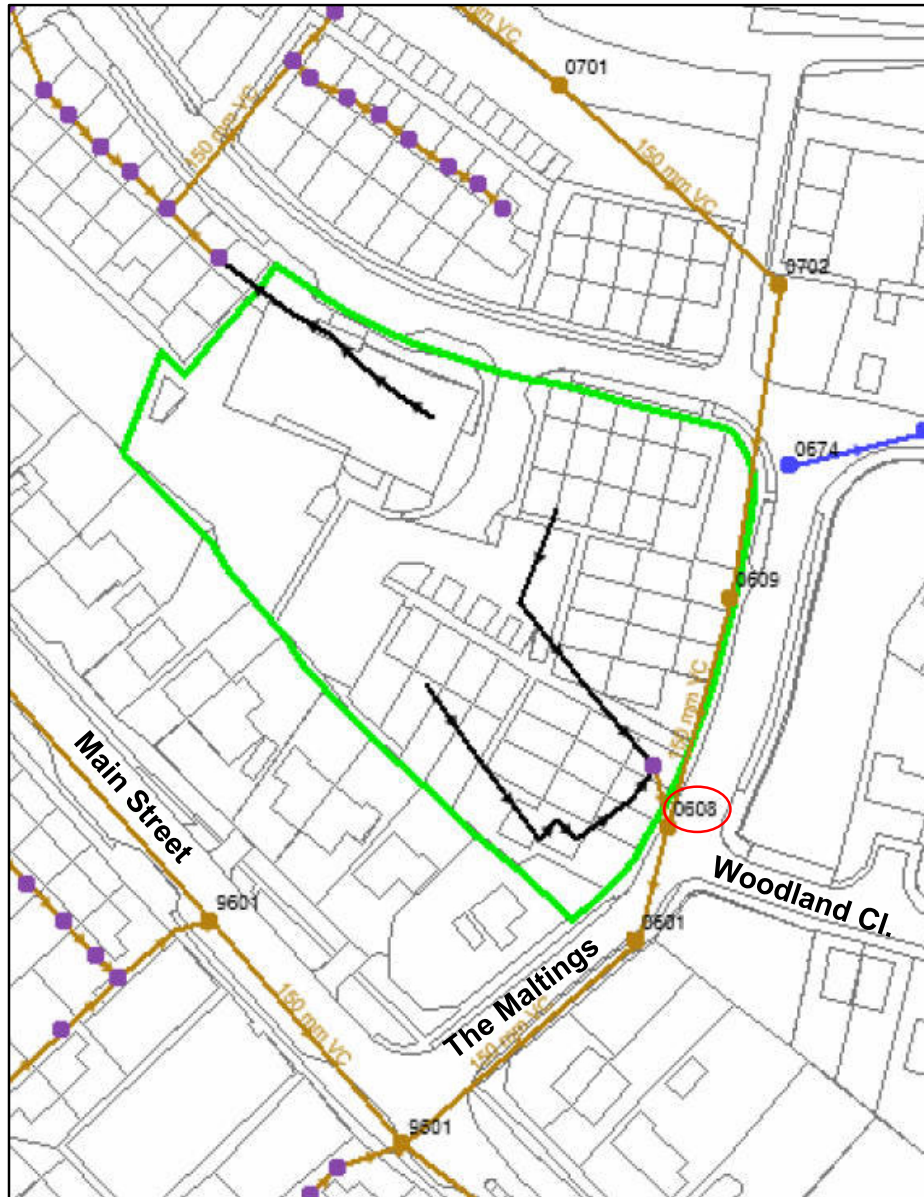
That implies that the maximum number of properties which should be connected to a 150 Ø sewer is 100 [18 l/s / 0.18 l/s] provided that the load is only from foul water and not from a combination of surface water and foul.

Even if the sewer is running at a gradient of say 1:50, the permitted flow rate is only ~26 l/s which implies that the maximum number of properties which should be connected to a 150 Ø sewer is 144.

The calculations are only approximate but as SW accepts that the system does have a partially combined load, asserts that the system is not overloaded and still wouldn't be overloaded with another 45 dwellings on the Pippins site [albeit definitely foul only connections], there is a clear discrepancy somewhere.

Annexe 2 : Sewer at Chamber 0608

The foul sewer comes down from the original Maltings estate and turns more or less south then south west to connect with the sewer in Main Street, as shown on SW's official map :



This note examines chambers 0609 [just before 0608], 0608, 0601 [just after 0608] and 9501 [the intersection with the main sewer running down Main Street].

The cover elevation and the invert level [the bottom of the sewer pipe] are both given for each chamber.

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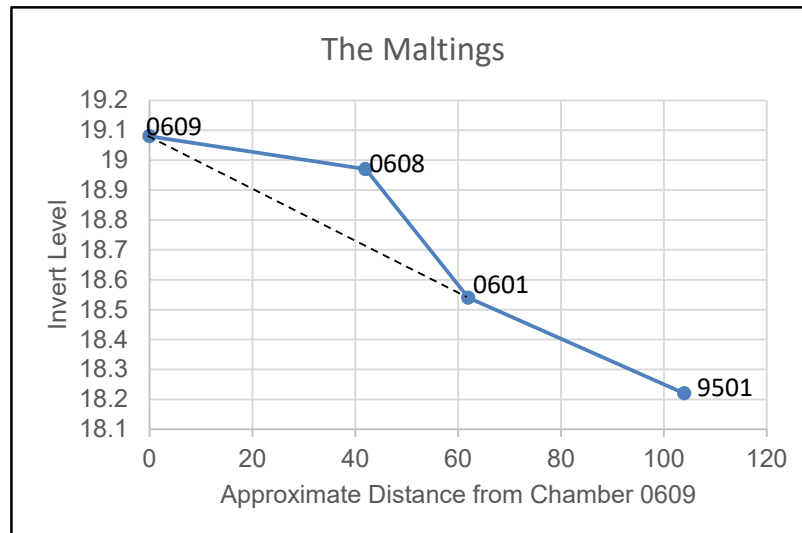
There is a clear error on the data provided on the SW map which gives :

0601	F	19.52	18.54
0608	F	99.36	98.97
0609	F	19.61	19.08

Note the reported elevations for 0608 : the top of the central ridge of the parish is only a little over 65 metres elevation. It has been assumed that the chamber 0608 data should be 19.36 / 18.97, i.e. the leading 9 should be a 1. The figures for the four chambers are therefore :

Chamber	Invert	Cover	Depth
0609	19.08	19.61	0.53
0608	18.97	19.36	0.39
0601	18.54	19.52	0.98
9501	18.22	20.11	1.89

Note how shallow 0608 is : the cover is only 39 cm [~15.5 inches] above the bottom of the sewer pipe so only 24 cm [~9.5 inches] above the top of the pipe. Using approximate distances between chambers allows the gradient between each to be calculated and plotted :



As can be seen, the gradients vary widely :

Run	Gradient
0609 to 0608	1:382
0608 to 0601	1:47
0601 to 9501	1:131

It would seem that the invert level is too shallow and should be about 18.7 by visual inspection of the dashed 0609 to 0601 line. That may be because the error on the map is more complex than an assumed typographic problem but it does need investigating.

Appendix 4 : Views and Green Spaces

1 Introduction

Peasmarsh Neighbourhood Development Plan includes two policies specifically designed to protect aspects of the parish :

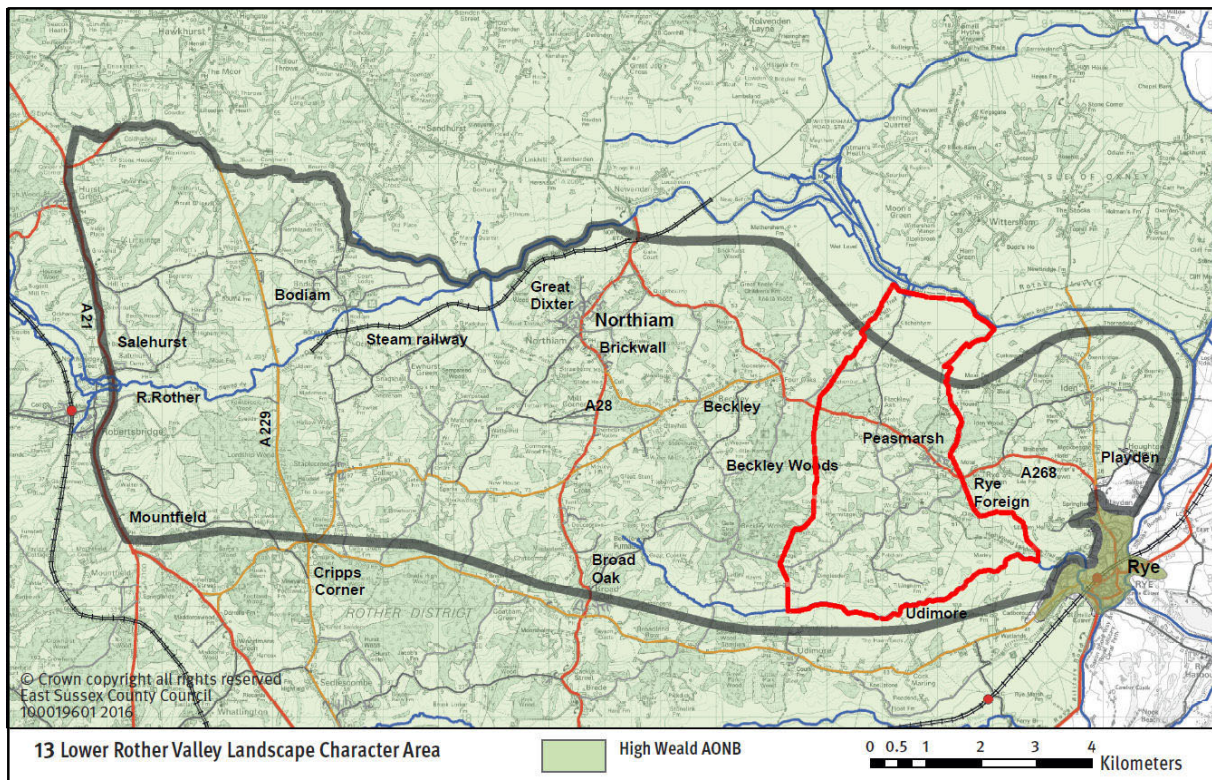
Policy L1 nominates a number of publicly accessible impressive views that should be safeguarded from the impact of development;

Policy L5 nominates a number of local green spaces – primarily in Peasmarsh village – that should be safeguarded from the impact of development; a green space has the same protection in law as Green Belt land;

This document describes the views and spaces in more detail than is possible in the Plan itself.

2 Protected Views

Most of the parish falls within the Lower Rother Valley Landscape Character Area of the 2016 ESCC Landscape Assessment¹ :



Source : 2016 ESCC Landscape Assessment Section 13

Figure 1 : Map of Lower Rother Valley Landscape Character Area

¹ <https://www.eastsussex.gov.uk/media/moxjuau3/area-13-lower-rother-valley.pdf>



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The characteristics of the area are summarised as :

- the broad valley of the lower reaches of the River Rother and the Tillingham Valley with a flat open floor and steep, well wooded sides;
- long dramatic views across both valleys from the ridges and spurs;
- an intricate pattern of rectangular fields bounded by reed fringed ditches in the flood plains;
- exceptionally remote unspoilt areas away from the main roads and villages;
- many typical features of the High Weald : scattered farmsteads, hamlets and large country house estates; scattered woodland on the slopes and higher ground, much of it ancient woodland, with oak and ash plus sweet chestnut coppice on drier slopes;
- swans, herons and other wetland birds are very much features in the landscape;

2.1 Selection of Locally Significant Views

Given the above and the fact that Peasmarsh is a rural parish in the AONB, there is a large number of potential landscape views that might be protected, particularly because the central ridge between the two river valleys provides views across the valleys on either side to distant locations. It was therefore decided that only views from roads or public rights of way would be considered.

An initial list of potential views was prepared by the PNDP group in order to seed the stakeholders' thinking. That list was then presented to the stakeholders in order to let them add or remove suggestions and to improve the initial comments that accompanied the list. The final list is below.

The Plan proposes a total of eight locally significant views deserving of protection in accordance with policy L1. Each is readily accessible from either a road or a footpath :

Location	Description and Significance
PMLV01 from Main Street [A268] opposite Old Winders looking north across the Rother Valley	This view looks across the steeply sloping field adjacent to Main Street and the tree belt beyond to the width of the Rother Valley. The valley is one of the key characteristics of the Lower Rother Valley landscape character area in ESCC's 2016 County Landscape Assessment.
PMLV02 from the fields above Sharvels Farm on PRoW PSM/8/2 looking north across the Rother Valley towards Wittersham	This view is on a footpath which heads north from Sharvels Farmhouse just before the land falls away into the Rother Valley. It looks across the valley to Wittersham in the distance.



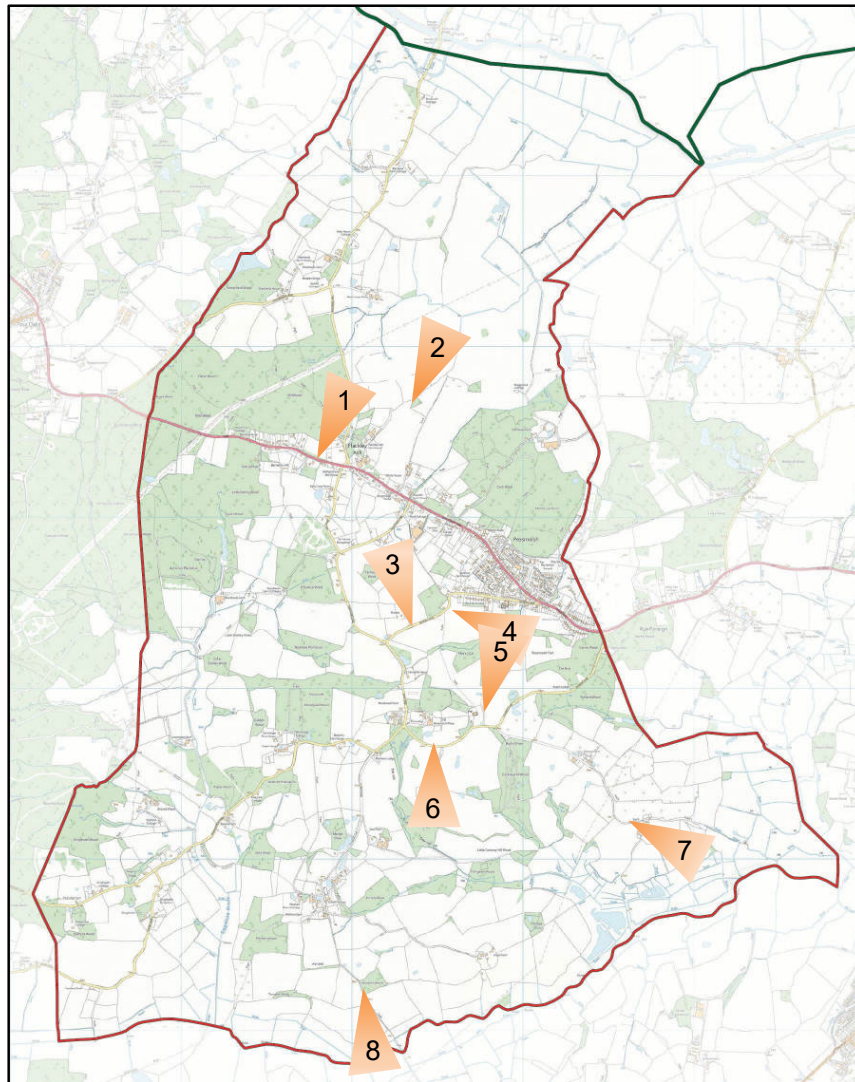
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<p>PMLV03</p> <p>from School Lane at Bushy looking north west towards Flackley Ash and beyond</p>	<p>This view is from the upper reaches of School Lane by the entrance to Bushey. It takes in the cluster of listed buildings at Tanhouse and beyond to what some consider the hamlet of Flackley Ash. The North Downs are in the distance.</p>
<p>PMLV04</p> <p>from PRoW PSM/22/1 looking east</p>	<p>This view is from the footpath that goes from the top end of School Lane near the abandoned house to the church. It looks across the eastern end of the village towards Romney Marsh.</p>
<p>PMLV05</p> <p>from the fields behind the Church on PRoW PSM/24/3 looking north towards Wittersham</p>	<p>This view is from the historically important footpath that leads from the church down to what was the core of the late medieval village around the junction of Main Street and School Lane. It takes in the Rother Valley with Wittersham in the distance.</p>
<p>PMLV06</p> <p>from Church Lane looking south towards Fairlight and Hastings</p>	<p>This view is from Church Lane somewhat west of the church. The view is similar to view 8 but from a higher elevation so it looks across that view to provide and a long distance panorama.</p>
<p>PMLV07</p> <p>from Clayton Farm on PRoW PSM/32/4 south/south looking east towards Rye and the sea</p>	<p>This view, on the regionally important High Weald Landscape Trail, looks across the broad but steeply sloping valley of the River Tillingham to the historic town of Rye and beyond to the English Channel.</p>
<p>PMLV08</p> <p>from Tillingham farm on PRoW PSM/30/5 looking south across the valley to Udimore</p>	<p>This view is from a footpath which heads south to Cock Marling in Udimore Parish on the far side of the Tillingham valley. As with the Rother Valley, the Tillingham valley is a key characteristics of the Lower Rother Valley landscape.</p>

Figure 2 [over] is a map showing the location of each of the above views.

A picture taken from each viewpoint is provided on the subsequent pages.

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Source : PNDP information

Figure 2 : Map of Locally Significant Views

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2.2 Photographs of Locally Significant Views



PMLV01 : from A268 opposite Old Winders looking north across the Rother Valley to Wittersham



PMLV02 : from PRow PSM/8/2 across the Rother Valley to Wittersham

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PMLV03 : from School Lane at Bushy looking north west towards Flackley Ash and beyond



PMLV04 : from PRoW PSM/22/1 looking east across the village to Romney Marsh

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PMLV05 : from PRow PSM/24/3 behind the Church looking north towards Wittersham



PMLV06 : from Church Lane looking south towards Fairlight and Hastings

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PMLV07 : from PRow PSM/32/4 looking south/south east towards Rye and the sea



PMLV08 : from PRow PSM/30/5 looking south across the valley to Udimore



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3 Local Green Spaces

NPPF paragraphs 101 and 102 set out the criteria for designating Local Green Spaces. 101 requires that such spaces should be capable of enduring beyond the plan period. 102 states that the designation should only be used where the green space is :

- (a) in reasonably close proximity to the community it serves;
- (b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- (c) local in character and is not an extensive tract of land.

3.1 Selection of Local Green Spaces

As with the locally significant views, an initial list of potential green spaces was prepared by the PNDP group in order to seed the stakeholders' thinking. That list was then presented to the stakeholders in order to let them add or remove suggestions and to improve the initial comments that accompanied the list. The final list is below.

The Plan proposes a total of seven Local Green Spaces deserving of protection in accordance with policy L5. Each complies with the criteria set out in paragraphs 101 and 102 of the NPPF :

Name and Location	Description and Usage	Quality of Facility
PMGS01 Recreation Ground and Play Area Immediately north of The Old Hop Garden	The parish recreation ground. The area is approximately 1 hectare. It has a children's' playpark, skatepark, basketball goal and a pavilion. It is used for community events [her late Majesty's Jubilee was the most recent], is used to host sports training sessions in school holidays and football matches during the winter months. It also provides a relaxation space for the community.	The facility is well maintained and the pavilion, which is lockable and has water and electricity supplies is considered to be well appointed [it is heated for instance]. Although the ground is flat, it is not level with a distinct slope from west to east.
PMGS02 Maltings Allotments On the east side of The Maltings immediately north of Woodlands Close	The parish allotment gardens. The area is approximately 1500 m ² divided into 11 individual allotments. There is always a waiting list for allocation.	These allotments are currently the only ones in the parish. They provide good recreational value for tenants and families, and healthy physical exercise. The atmosphere is tranquil and comradely, providing an escape from busy family or working lives.

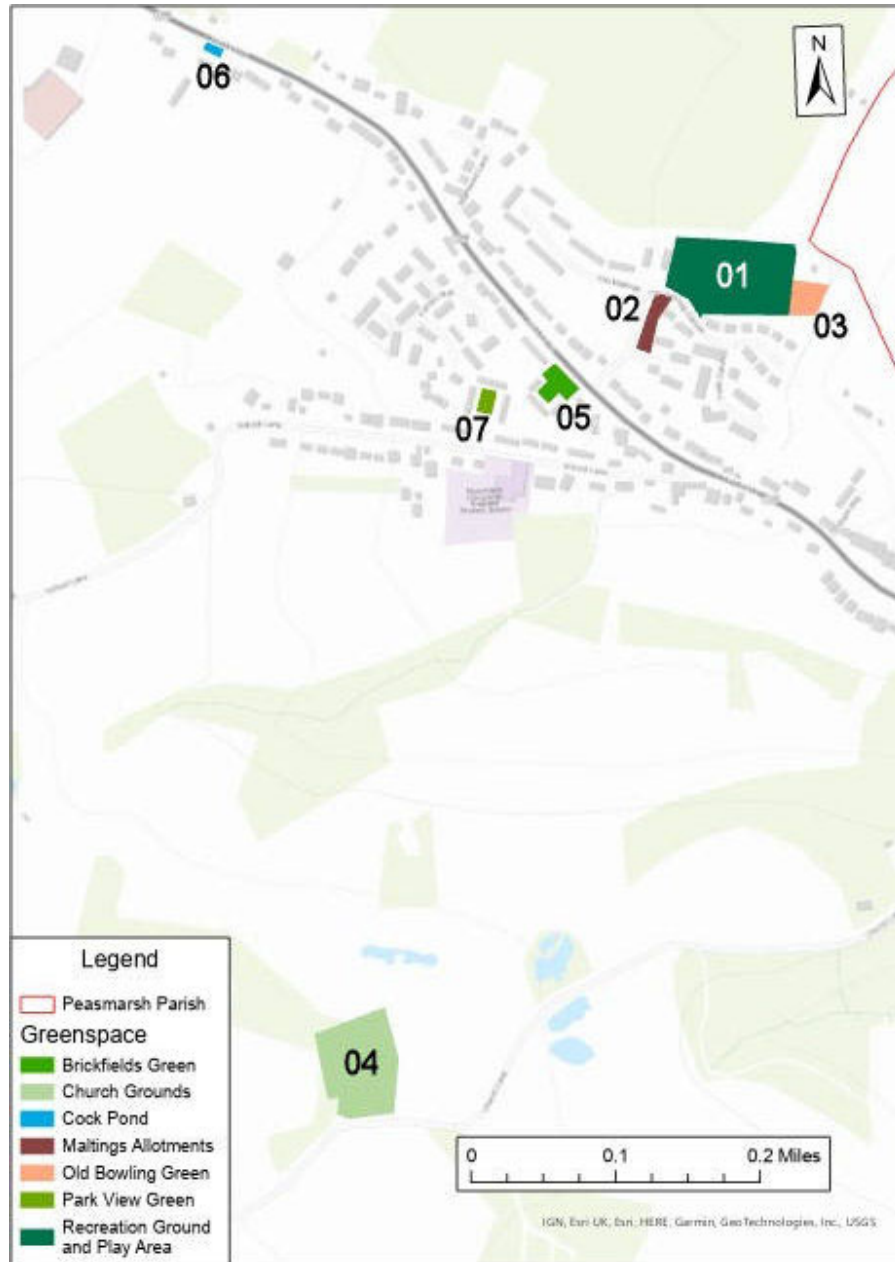


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<p>PMGS03 Old Bowling Green</p> <p>Immediately east of and adjacent to the recreation ground</p>	<p>This was a facility used by a bowling club until the pandemic but that club did not survive lockdown. The area is approximately 1000 m².</p> <p>Discussions are ongoing within the parish as to how best to use the space : a Jubilee Garden has been proposed as have additional allotments but nobody seems to want to run it as a bowling green.</p>	<p>This is a good facility within its own fence and is, of course, perfectly level. It has its own irrigation system. There is a small pavilion and parking for about 12 cars</p>
<p>PMGS04 Church Grounds</p> <p>Around the church of St Peter and St Paul to the north of Church Lane.</p>	<p>The churchyard / cemetery completely surrounds the [early Norman] church. The area is approximately 0.9 hectare.</p>	<p>The churchyard is well maintained by the parochial parish. It is designated as an archaeological notification area.</p> <p>It is a tranquil space providing respite from a busy life.</p>
<p>PMGS05 Brickfield Green</p> <p>South west of Main Street opposite The Maltings, surrounded on three sides by numbers 3 to 10 of the Brickfield development.</p>	<p>This informal grassy area, approximately 1000 m², is as close as the village gets to having a village green. It is the location of the village sign for instance.</p> <p>The area is used by local children for playing informal games.</p>	<p>The grass is well maintained.</p> <p>The drawback is its proximity to Main Street, a dangerous road at the best of times.</p>
<p>PMGS06 Cock Pond</p> <p>At the top of Cock Hill on the south side of Main Street</p>	<p>This very small area, dominated by a weeping willow, is of historical importance as it was where the cock horse was unhitched having helped the main horse pull the cart up the hill. The pond gave both horses a chance to drink.</p>	<p>ESCC highways department accepts that the area is part of the maintainable highway but does not actually maintain it so it is cleared at intervals by volunteers.</p>
<p>PMGS07 Park View Green</p> <p>North of School Lane surrounded on three sides by numbers 8 to 19 of the Park View development.</p>	<p>This informal grassed area, approximately 1000 m², is similar to Brickfield Green.</p> <p>The area is used by local children for playing informal games.</p>	<p>The grass is well maintained and it does not have the same drawback as Brickfield Green because it is further from the road and that road is School Lane which is less busy than Main Street.</p>

Figure 3 [over] is a map showing the designated green spaces.

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Source : OS Greenspace, ESCC and local knowledge

Figure 3 : Local Green Spaces



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Appendix 5 : Glossary

Affordable Housing <i>see also 'Truly Affordable Housing'</i>	Housing for sale or rent, for those whose needs are not met by the market.
Ancient Woodland	Woodland which has been continuously wooded since 1600 [and hence probably for millennia].
Community Infrastructure Levy	A fixed, non-negotiable contribution that must be made by new development. It is chargeable on each net additional square metre of development built and is set by Rother District Council.
Designated Heritage Asset	A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.
Development Boundary	The boundary of a primarily built form area wherein the development of land may normally be appropriate. This does not include a presumption for the development of greenfield land such as playing fields and other open space.
First Homes	A government initiative offering affordable housing for sale. The price must be discounted by a minimum of 30% against the market value, the discount applying in perpetuity so that buyers cannot benefit from it when selling.
Green Infrastructure	A network of multi-functional green space, both urban and rural, capable of delivering a wide range of environmental and quality of life benefits for local communities.
Local Plan	A plan for the future development of a local area, drawn up by the Local Planning Authority in consultation with the community. A local plan can consist of either strategic or non-strategic policies, or a combination of the two.
Local Planning Authority	The public authority whose duty it is to carry out specific planning functions for a particular area. In the case of Peasmarsh this is Rother District Council.
Local Service Village	A village without enough facilities to be a Rural Service Centre but still with a significant number of services [see Section 4.2 of the Plan]



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Major Development	<p>For most of the country, this is development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m² or more, or a site of 1 hectare or more.</p> <p>However, inside a National Park, the Broads or an AONB [as is the case for Peasmarsh] the definition is devolved to the decision maker.</p>
Plantations on Ancient Woodland Sites	Ancient semi natural woodlands that have been felled and replanted with other tree species.
Rural Affordable Housing Site	Small sites used for affordable housing in perpetuity. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. A proportion of market homes may be allowed on the site at the local planning authority's discretion.
Shared Ownership	A house purchase scheme whereby the occupier owns a share of the property and pays rent on the portion not owned.
Strategic Environmental Assessment	A procedure [set out in the Environmental Assessment of Plans and Programmes Regulations 2004] which requires the formal environmental assessment of plans which are likely to have significant effects on the environment.
Sustainable Transport	Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, ultra-low and zero emission vehicles, car sharing and public transport.
Truly Affordable Housing <i>see also 'Affordable Housing'</i>	Affordable Housing in the context of the parish as discussed in Section 6.4.1 of the Plan.
Windfall Site	A site not specifically identified in the development plan.