

**Submission Peasmarsh Neighbourhood Plan Representations**

Respondent Details			Agent Details		Part of Neighbourhood Plan		Summary of Comments	Participate in oral exam	Notify when NP made
Reference	Respondent Name	Organisation (if applicable)	Agent Name	Organisation (if applicable)	Item	Support/ Object/ Comment			
PNP/R16/2023/1	Tonia Krauhaus				Site allocation PM02 Woodside	Object	New access onto Tanhouse Lane would exacerbate an already busy junction (deliveries to Jempsons Supermarket, petrol station, nearby venues). The proposed site (PM02 Woodside) is used by dog walkers and people exercising.	Y	Y
PNP/R16/2023/2	Peter Mackay				Whole plan and housing	Comment	The NP identifies that Peasmarsh is lacking in many amenities. More housing will change the character of the village.	Y	Y
PNP/R16/2023/3	Sally Chaplin	Rwanda Aid			Site allocation PM01 Flackley Ash	Objection	The site is outside the development boundary, there is no pavement and it is too small for many houses. Mature trees and wildlife exist on the site.	Y	Y
PNP/R16/2023/4	Vanessa Smith				Whole plan Site allocation PM01 Flackley Ash	Comment	<p>General problem with development and lack of amenities in Peasmarsh, including sewage system, school capacity, doctors/dentists, public transport, telecomms. NPPF states that there must be sufficient infrastructure, community facilities, enhancement of the natural and built environment. I do not feel that this is the case especially with the Flackley Ash site.</p> <p>How would PM01 be protected as a rural exception site for local families once planning permission was granted?</p> <p><i>Sewage</i> : Flackley Ash houses are not currently connected to the sewage system, leading to problems such as non- sustainable development and the impact on house prices.</p> <p><i>Access</i> : existing access is a narrow lane. Two applications on Mackerel Hill have been refused by the planning authority due to insufficient road capacity. There is no pavement or accessibility for wheelchair users.</p> <p><i>Noise and visual impact</i> : the site is surrounded by countryside and wildlife, assurances are required that new development will not be detrimental to biodiversity including any additional light.</p> <p><i>Heritage and visual impact</i> : The Flackley Ash Hotel is described as being in a 'totally rural setting'. Additional development would change the character of the hamlet and contrary to the NPPF. Concern over how the listed building will be protected against new development.</p> <p>Poor telecommunications and frequent electricity supply distribution: are both extremely poor. Electricity and water supply is subject to intermittent outages, adding to disruption of the residents. Two power lines are present either within or next to the proposed site.</p> <p><i>Community facilities</i> : All sited in the village core. The Flackley Ash site offers no provision and no areas that could accommodate it.</p>	Y	Y
PNP/R16/2023/5	Carlie Jackson				Chapter 6, pg.80 para 7.52 Site allocation Flackley Ash	Object	My bedroom window will overlook development. The garden will be overlooked. Loss of privacy. I will have a long boundary with the development. The character of the area will be changed. Noise. Trees will be cut down.	Y	Y
PNP/R16/2023/6	David Jackson				Chapter 6, pg.80 para 7.52 Site allocation Flackley Ash	Object	I own Flackley Ash Farm Cottage, a historic 18 century 3 bedroom house, the main bedroom of which overlooks the field Flackley Ash site. The garden adjoins the site. the development proposal since it will considerably change the character and amenity of a historic rural area. Our property would significantly lose privacy as would my mother's property next door. It would also harm our neighbours who encircle the site. 10 properties is entirely out of character with the low density of this historic area. 1-2 bedroom properties are alien to the immediate 250m around the property. It will interrupt badgers and other wildlife habitat. It will impact the long strip of garden above my mother's paddock.	Y	Y

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PNP/R16/2023/7	Matthew Batchelor				Pg 79 Site allocation Flackley Ash	Object	<p><i>Scale of development:</i> the development would change the character of the area ad out of proportion. The site is next to a listed building with another to the west.</p> <p><i>Distinctiveness of the area</i></p> <p><i>Visual impact:</i> If the assumption that the ste is screened from te wider area is based on being totally enclosed, please note that the hedgerow only provides a reasonable level of enclosure for the summer months, for the remainder of the year the plot is exposed to the surrounding landscape, and vice versa.</p> <p><i>Public consultation:</i> The results of the first public consultation identified that the priorities were drainage, public transport, electricity supply, telecommunications, health services, education facilities, development of this site compounds these issues.</p> <p><i>Wildlife and landscape :</i> There is a thriving ecosystem with an abundance of birds, bats, badgers, owls, and fauna within Flackley Ash. The proposed site forms an integral part of that ecosystem, and contains a mature habitat that should be protected against large scale developments. Was an arb survey undertaken to identify and protect ancient and veteran trees?</p> <p><i>Sewage and drainage :</i> There is no sewage disposal system available at the proposed site and the sewer map in the PNDP identifies that the network is a substantial distance away. Connecting to the existing network would be highly disruptive and expensive. By removing trees on site the water will have no where to go other than down the hill negatively impacting on the surrounding houses and farmland.</p>	Y	Y
							<p><i>Access:</i> The steep hill towards the heart of Peasmarsh cannot be expanded due to the A268 and is inaccessible to wheelchairs and mobility scooters therefore socially isolating older local people. These perspective residents would then have to rely on cars not promoting the PNDP vision of non vehicular connectivity.</p> <p><i>Water supply:</i> The water supply for Flackley Ash Cottage is laid within the boundary for the proposed site for it's entire length. This would necessitate the supply water to be repositioned from Mackerel Hill to the rear of Flackley Ash Cottage where the supply enters the property.</p>		
PNP/R16/2023/8	PN Rouse				Site allocation PEA L01 Cornerways  pg.83 PEA L01 Cornerways  Consultation Statement  Strategic Environmental Plan	Object	<p>80% of consultation feedback objected to the inclusion of the site leading to the formation of the 'No To Cornerways' group. Phsical constraints: the site is steeply sloping, there is no vehicle , pedestrain or cycle access to the site, there is a PROW which will be impacted, there is a veteran tree and ancient woodland, loss of social amenity and community value as area is popular for walking and contrains a PROW.</p> <p><i>Landscape and visual constraints :</i> Development should follow boundaries to prevent inappropriate backland development from encroaching into the countryside and harming rural settlements which is what would happen if the area was developed. To include Cornerways the boundary would have to be moved. The area is not 'built up' as stated, and there is little capacity for change.</p> <p><i>Heritage Constraints :</i> The site is not connected to the existing built up area. The size of the site will change the size and character of the area.</p> <p><i>Viability :</i> Where is the required evidence for the comment that there are no costs that would affect viability? Impact on surface water flooding and sewage capacity has not been considered.</p> <p>Pg.83 PEA L01 This area is rural in nature and of moderate to high visual and character sensitivity ( far more so than Tanyard which was of lesser rating but which the Committee rejected).Tthere is low capability to accept change for housing and low potential to mitigate. The view should protected, The Mount would be impacted by development and access is problematic. Extending the tree line behind houses on School Lane would be inappropriate and ineffective. The objections to this site have been overwhelming. Why did the committee reject the Tanyard Filed site which had less reasons for objection than Cornerways?</p>	Y	Y
							<p>Consultation Statement pg41- Rother found the site to be elevated and exposed with a strong rural character and determine that development here would have an urbanising impact and be harmful to the AONB contrary to para 176 of NPPF. The Committee disagreed suggesting that by extending a tree belt this would be good mitigation. Where is their evidence for this? No regard has been had to the resident feedback which wholly agrees with Rother.</p> <p>Strategic Environmental Plan pg.42 The committee rejected Tanyard site despite it being recommended for development by Aecom. The Tanyard site was considered to be negatively impacted by historic environment because fo the impact on 2 listed buildings, the Horse and Cart pub which is no longer running as a business and the Rectory which is the home of the Committee Chairman.</p>		

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PNP/R16/2023/9	Keith Haver				Site allocation PEA L01 Cornerways  pg.83 PEA L01 Cornerways  Consultation Statement  Strategic Environmental Plan	Object	As above		Y	Y
PNP/R16/2023/10	Jax Webster				Site allocation PEA L01 Cornerways  pg.83 PEA L01 Cornerways  Consultation Statement  Strategic Environmental Plan	Object	As above			
PNP/R16/2023/11	Liam Monks				Site allocation PEA L01 Cornerways  pg.83 PEA L01 Cornerways  Consultation Statement  Strategic Environmental Plan	Object	As above		Y	Y
PNP/R16/2023/12	Fran Berry				Site allocation PEA L01 Cornerways  pg.83 PEA L01 Cornerways  Consultation Statement  Strategic Environmental Plan	Object	As above		Y	Y
PNP/R16/2023/13	Lisa Marosi				Site allocation PEA L01 Cornerways  pg.83 PEA L01 Cornerways  Consultation Statement  Strategic Environmental Plan	Object	As above		Y	Y
PNP/R16/2023/14	P Taylor				Site allocation PEA L01 Cornerways  pg.83 PEA L01 Cornerways  Consultation Statement  Strategic Environmental Plan	Object	As above		Y	Y

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PNP/R16/2023/15	Elaine Taylor				Site allocation PEA L01 Cornerways  pg.83 PEA L01 Cornerways  Consultation Statement  Strategic Environmental Plan	Object	As above		Y	Y
PNP/R16/2023/16	D Weller				Site allocation PEA L01 Cornerways  pg.83 PEA L01 Cornerways  Consultation Statement  Strategic Environmental Plan	Object	As above		Y	Y
PNP/R16/2023/17	S Weller				Site allocation PEA L01 Cornerways  pg.83 PEA L01 Cornerways  Consultation Statement  Strategic Environmental Plan	Object	As above		Y	Y
PNP/R16/2023/18	Pam Bachu				Site allocation PEA L01 Cornerways  pg.83 PEA L01 Cornerways  Consultation Statement  Strategic Environmental Plan	Object	As above		Y	Y
PNP/R16/2023/19	Ruth Elliot				Site allocation PEA L01 Cornerways  pg.83 PEA L01 Cornerways  Consultation Statement  Strategic Environmental Plan	Object	As above		Y	Y
PNP/R16/2023/20	Alison Bones				Site allocation PEA L01 Cornerways  pg.83 PEA L01 Cornerways  Consultation Statement  Strategic Environmental Plan	Object	As above		Y	Y

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PNP/R16/2023/21	Nicola Monks				Site allocation PEA L01 Cornerways  pg.83 PEA L01 Cornerways  Consultation Statement  Strategic Environmental Plan	Object	As above		Y	Y
PNP/R16/2023/22	Nick Rouse				Site allocation PEA L01 Cornerways  pg.83 PEA L01 Cornerways  Consultation Statement  Strategic Environmental Plan	Object	As above		Y	Y
PNP/R16/2023/23	Ruth Feeny-Brown				Site allocation PEA L01 Cornerways  pg.83 PEA L01 Cornerways  Consultation Statement  Strategic Environmental Plan	Object	As above		Y	Y
PNP/R16/2023/24	Nigel Fellows				Site allocation PEA L01 Cornerways  pg.83 PEA L01 Cornerways  Consultation Statement  Strategic Environmental Plan	Object	As above		Y	Y
PNP/R16/2023/25	Timothy Watson				Whole plan	Comment	Public transport and connectivity between services in Peasmarsh is very poor. How would it be improved? Sewage structure needs upgrading. Telecommunication can be poor as is electrical service with power failures. Road maintenance is necessary as potholes are awful. More low rent, social and affordable housing is needed. Please preserve as much green space as possible to assist sustainability goals. More police presence. The need for a sustainable and more environmentally future for the parish of Peasmarsh must be balanced with economic considerations including peoples requirements for getting to work and be of good value to the taxpayers.		Y	Y
PNP/R16/2023/26	Viscount Terrance Devonport		Will Laing	Ethical Partnership	Site allocations PEA024 Tanyard Field and PEA025 Tanhouse	Support	This representation and supports the allocation of both sites for: i. A specialist care development to provide accommodation for older persons and key worker housing at Tanyard Field (Site Reference: PEA024); and ii. housing at Tanhouse (Site Reference: PEA025). The allocation of the aforementioned sites will provide opportunities for sustainable, affordable housing, sustainable economic development and development to support an ageing population, in line with the aims and objectives of the Draft Peasmarsh Neighbourhood Development Plan. Our client owns and operates the Peasmarsh Place Care Home to the south of Peasmarsh village. Our client wishes to further extend operations within Peasmarsh to an accessible and sustainable location within Peasmarsh village. The inconsistency between the proposed site allocations and the site options assessment report draws into question the soundness of the sites proposed to be allocated for housing development within the Draft Neighbourhood Plan.		Y	Y

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						<p><b>Tanyard Field PEA024</b> The site was rated as 'Amber' within the Peasmarsh Site Options and Assessment report by Aecom and it is requested that it be included as an allocated site for supported living accomodation and key worker housing in order to help address the identified ageing population and local shortage of affordable housing. It has been dismissed without any notable investigations by suitably qualified professionals.</p> <p><b>Tanhouse Site PEA025</b> The Tanhouse site has been categorised as a 'red' site within the AECOM Peasmarsh Site Options and Assessment Report and has been unreasonably dismissed as an unsustainable site due to the site being 'detached from the settlement boundary and main residential area'. The allocation of Tanhouse would make a small contribution to housing numbers within the Rother district and potentially contribute to provision in the shortfall of housing aligning with the ambitions of the Peasmarsh Neighbourhood Development Plan to address the identified need for improved housing provision for those working locally, younger households and a small number of older people wishing to downsize whilst remaining living independently in the village. It is requested that Tanhouse is included within the Draft Peasmarsh Neighbourhood Plan.</p>		
						<p><b>Care provision for older people</b> We have evidence that the local and regional population is an ageing one creating demand for specialist housing, care provision and health services. This is exacerbated in Peasmarsh with a shortfall in smaller properties for down-sizing. There is not a oversupply of local care home provision and consideration has not been given to the types of care available or the current levels of demand. There are no local or national policies that set a cap on the level of care provision.</p> <p><b>Infrastructure</b> New development will be required to faciliate the investment and improvement to the existing infrastructure. Development on our sites has the potential to unlock investment and scale of development required to deliver the infrastructure improvements sought by the PNP.</p> <p><b>Housing</b> A detailed study of the existitng housing stock shows that there is a shortfall in affordable housing provision and smaller dwellings. The allocation of the Tanhouse site and Tanyard Filed would make a contributon in addressing the shortfall in smaller and affordable housing, as well as sustainble employment and social and economic benefits. The proposed policy restriction to 10 dwellings per site is unjust and prevents the PNP addressing the housing issues and objectives of the Plan.</p>		
						<p><b>Economy</b> Policies E2 and E4 are not sound. The NDP sets out aims and objectives to improve local infrastructure, but these remain contrary to the restrictions on development. Tanyard Field for a Care Development with Key Worker housing area should be given consideration and allocation. Development ere would support the local economy and make a contribution to affordable housing and infrastructure provision.</p>		
<b>Statutory Representations</b>								
PNP/R16/2023/27	Louise Dandy	Historic England				No comment at this time. Please refer to any comments made at Regulation 14.		

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PNP/R16/2023/28	Ben Hook	RDC			Whole plan	Comment	<p><b>Policy L1: Protection of Locally Significant Views</b> We are pleased to read that advice given at Reg 14 has been acknowledged and the policy amended. Please note that as the parish is located within the High Weald AONB, all of the surrounding countryside has landscape value, and care should be taken in the wording or supporting text to recognise this, as well as the fact that not only views that can be enjoyed by the public should be protected.</p> <p><b>Policy L4: Protection of Biodiversity</b> The Environment Act will require development to deliver 10% Biodiversity Net Gain (BNG). We acknowledge the aspiration of the Parish Council to require delivery of 15% BNG, however, this requires an evidence base to justify a higher level of BNG and demonstrate that it is viable for development to deliver a higher percentage. The Council is currently working to gather the evidence base that will determine the level of BNG which can be required, and the expectation is that this will be set by the new Local Plan.</p> <p><b>Policy L5: Protection of Local Green Space</b> We recommend omitting the final sentence as this intention is clearer in paragraph 103 of the NPPF which reads 'Policies for managing development within a Local Green Space should be consistent with those for Green Belts.'</p> <p><b>Policy L6: Retain and Improve Public Access</b> As advised at Reg 14, the supporting text highlights that there are many traffic-free greenways linking parts of the village and beyond, and this policy would have been a good opportunity to highlight particular routes to promote or to enhance with the support of landowners. We feel the policy could be more detailed and localised.</p> <p><b>Policy L7: Sustainable Public Transport</b> We support the intent of this policy, and recommend that the title is amended to 'Public Transport'</p> <p><b>Policy I2: Sewage System Improvement</b> We recommend that the first paragraph is deleted. We are unsure how an 'independent capacity check' could be undertaken by 'persons with access to the necessary data/infrastructure' other than the service provider, Southern Water, who we anticipate will be making their own representations.</p>		
							<p><b>Policy I3: Surface Water Drainage</b> Amend 'must' to 'should'. We support this policy with this amendment.</p> <p><b>Policy I4: Power Supply</b> This policy would be stronger if combined with the 'energy' part of policy D4: Energy Efficiency and Sustainability in order to cover existing supply and renewable potential.</p> <p><b>Policy I8: Developer Obligations</b> We support this policy.</p> <p><b>Policy E2: Adaptation of Existing Buildings for Working from Home</b> Extensions and outbuildings are currently covered effectively by Rother Local Plan DaSA Policy DHG9, however if the intent of the policy is to facilitate outbuildings that are more than 20M from the main building (which require planning permission in the High Weald AONB) a re-worded policy could be valid in support of home-working. We recommend the last two criteria are deleted as they do not relate to a 'working from home' policy.</p> <p><b>Policy E3: Rural Building Conversion for Business Use</b> This policy does not add to Rother Local Plan Core Strategy Policy RA4: Traditional Historic Farm Buildings. The existing Local Plan policy is robust, and the proposed policy may undermine it. We recommend that this policy is deleted.</p> <p><b>Policy H1: Housing Mix</b> This policy conflicts with Rother Local Plan Core Strategy Policy LHN1. We acknowledge that the assessed housing need reported by Aecom forms the evidence for the proposed percentages, however this has not been viability tested and therefore conflicts with the percentages set out in Policy LHN1.</p> <p><b>Policy H2: Rural Affordable Housing Sites</b> We recommend that this policy is deleted as there are no wholly affordable housing allocations proposed by the Plan.</p> <p><b>Policy H3: Conversion of Rural Buildings to Residential Use</b> This policy does not add value to Local Plan Core Strategy Policy RA4: Traditional Historic Farm Buildings. We recommend that it is deleted.</p>		
							<p><b>Policy S1: Development Size</b> As advised at Regulation 14 the policy conflicts with local and national policy. Whilst the High Weald Management Plan seeks to 'prioritise the delivery of new housing primarily through small-scale development..' the document does not limit housing development to 10 dwellings, or any number of dwellings, as stated in the supporting text. We disagree that a planning judgement on what constitutes 'major development' in the High Weald AONB, as defined by paragraph 177 and footnote 60 of the NPPF, can be made at parish level and it is not possible to set a dwelling number threshold. This is because footnote 60 of the NPPF sets out that "whether a proposal is 'major development' it 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". The decision-maker is the authority determining the planning application, which in the first instance is the Local Planning authority, RDC, or, where there is an appeal the Planning Inspectorate. We recommend that this policy is deleted.</p> <p><b>Policy S2: Allocated Sites</b> The last sentence of the policy could unnecessarily restrict windfall development and should be deleted. However, the estimate for 20 dwellings (stated in Conclusions) to come forward as windfalls is reasonable.</p>		

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						<p><b>Proposed allocations</b>                  PM01 and PM02 are both proposed as affordable housing sites for up to 10 dwellings. Whilst the PNP can allocate the sites for wholly or substantially affordable housing (as per Core Strategy Policy LHN4: Sites for Wholly or Substantially Affordable Housing), neither of the sites are “within or adjacent to the settlement boundary” and so would not comply with Policy LHN4.                  PM03 and PEA01 are not allocated “but could become available in the longer terms should suitable vehicular access be found”. RDC supports this proposal subject to access and associated assessments on the sites.</p> <p>Comments on sites:  <b>PM01</b> – The site is not as well related to services as other sites and has to date been consider as an unsustainable location. Access is off a narrow lane with no footways although it is only a short distance to the A265, footway exists. Pedestrian crossing facilities need to be provided on the A265 and footways improved, though residents will still be largely car-reliant. This is of particular concern given that the entire site is proposed for affordable housing. Development of the site would harm the rural character of the location (particularly if works are required to the narrow lane to facilitate access) and would appear to result in the loss of many trees currently within the site, although a recent site visit highlighted that many of the trees are ornamental and could be replaced with native species subject to an arboricultural survey. Development could also harm the setting of the nearby listed buildings.  <b>PM02</b> – While this is better related to some services than PM01, it remains at the far western end of the village. A new access and development here would change the rural character of this edge of the village location, breaking through a significant tree line and necessitating the removal of a number of mature trees. Access on to the main road, which currently has a speed limit of 40mph, is a major consideration for this proposed site. There could also be an adverse effect on the setting of adjacent listed buildings.</p>		
						<p><b>PM04</b> –A small residential development could potentially be accommodated, subject to the Highway Authority's acceptance of the access road and subject to careful design to protect the amenity of the adjoining dwellings.  <b>PEAL01</b> – This is an exposed and elevated site which has a strong rural character, development here would have an urbanising impact and be harmful to the AONB, contrary to paragraph 176 of the NPPF. Access appears problematic, via a narrow rural lane, which slopes steeply to the east. The Plan states that the sewerage connection does not extend all the way along School Lane, if this is the case then we question the site being suitable for further housing.</p> <p><b>Policy S3: Development Boundary</b> We support this policy.  <b>Policy D3: New Homes</b> This policy could be integrated with D2: Placemaking for a more comprehensive policy, however, as the policy intent is addressed in the Design Code, we recommend keeping the content in the Code, deleting the policy and sign-posting the Code in the chapter text. The supporting text references Lifetime Homes which is an out of date standard. This should be amended to Building Regulations M4(2) and text referring to Lifetime Homes deleted.  <b>Policy D4: Energy Efficiency and Sustainability</b> We support this policy, and recommend, as mentioned above, that Policy I4: Power Supply is joined with D4. The policy does not mention heating or battery storage which we would hope to see in this policy.  <b>Policy SD5: Dark Skies</b> We support this policy.</p>		
						<p><b>Commuity aspirations</b>                  Project 1 - We support this approach for the delivery of affordable housing.</p>		
PNP/R16/2023/29		National Grid	Tom Wignal	Avison Young		National Grid Electricity Transmission plc (NGET) has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.		
PNP/R16/2023/30		National Gas	Tom Wignal	Avison Young		National Gas Transmission has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.		
PNP/R16/2023/31		National Highways	Diane Ngobi			We consider that based on this information there are no matters of concern for us in terms of residential development. We wish to reiterate, however, our request that further information about Policy E1 'New Business Space Development' is provided, particularly development quanta, so that we can consider whether there would be any material implications for the SRN.		

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PNP/R16/2023/32	Catherine Adamson	Southern Water			Whole plan Policy I2: Sewage System	Comment	Elements of the current draft of the Peasmarsh Neighbourhood Development Plan (PNDP) do not meet each of the set of basic conditions required by paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (T&CPA). We note that most of our requests for corrections at Regulation 14 (from page 4 of our response) have not been incorporated into the PNDP. In some instances, statements remain factually incorrect and misrepresentative of Southern Water. The evidence base for some of the PNDP's policies is not sufficiently robust, in particular Policy I2. We therefore do not consider that it would be appropriate to make the PDNP in its current iteration, particularly where content does not take account of the responses provided throughout the consultation process. We reiterate most our our previous comments.	N	Y
							<b>Policy 12: Sewage System Improvement</b> Paragraph 16(d) of the National Planning Policy Framework (NPPF) 2021 states that: "Plans should: d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals; " With reference to Policy I2's requirement that 'Development proposals which have undergone an independent capacity check of the parish sewer system by a qualified professional', it is not clear how an independent professional would carry out such capacity checks on the public sewer system. The water company is responsible for the public sewer system and it has not been established in the PNDP how this policy could work in practice. We cannot operate in this way, we cannot see how this policy could be applied in practice and interpreted by a decision maker. We have submitted proposed amendment to this policy.		
PNP/R16/2023/33	Andrew Motley	ESCC			Whole plan	Comment	<b>Highways department</b> <b>Policy L6.</b> Whilst we support the improvement of access, it is suggested that an amendment is included as follows "to retain and improve public access to, from and within the parish" <b>Policy L7</b> Sustainable public transport. Suggest reference is made to the opportunities associated with Community bus/taxi provision. <b>1.3</b> Policy I1 Improving Road Safety and Traffic Impact. The Council is supportive of this policy. <b>1.4 Policy D4</b> Energy Efficiency and Sustainability. Support the provision of EV charging at new developments. However, we suggest that reference is made to the opportunities for EV charging at existing properties and on-street provision.		
							<b>Projects</b> <b>Project 2</b> Road safety - Welcome the establishment of a working group within the village to work with partners as appropriate. <b>1.6</b> Project 3 Parking and Public EV charging - agree with the inclusion of this project as it aligns with the County Council's strategy for the deployment of electric vehicle charging infrastructure.		
							<b>Other comments:</b> ESCC Transport Strategy Documents; We note that key East Sussex County Council policies and strategies are not referenced, including: Emerging Local Transport Plan 4. The Local Transport Plan sets out the transport strategy for the county and is currently being refreshed. It is suggested that reference is made to this document at the beginning of the transport section of the plan outlining the key policy areas the plan will emphasize, to set the strategic context for transport. LTP4 is proposed to be available for public consultation from the autumn 2023. Bus Service Improvement Plan (BSIP) – includes service 313 through the parish.		
							<b>Local Cycle and Walking Infrastructure Plan (LCWIP)</b> – Please refer to the attached document. East Sussex LCWIP DRAFT Summary October 2020.pdf. Whilst this does not include a specific network for the parish of Peasmarsh. The LCWIP does include a network plan for nearby Rye, which is an important destination for residents, but it does include a potential cycling scheme linking Rye with Peasmarsh referred to as scheme R7 - Peasmarsh – Landgate. Please ensure that this is referred to in the plan.		
							<b>Specific transport comments:</b> Section 3.6.3 makes reference to lack of safe pavement on A268. We suggest that an explanation is included in relation to any safety issues. We note the issues with the bus service (frequency, first and last buses and integration with Rail Services at Rye). This information will be shared with the ESCC Transport Hub and Network Rail. We also note the challenges of active travel routes to Rye, and welcome the aspirations of a greenway linking the parish to Rye. We note that for some services (e.g. dentist, medical) and secondary and sixth form education residents need to travel further and outside of the parish to access these.		

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						<p>We welcome the connection between Health and Wellbeing and active travel and that “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.”</p> <p>Section 3.6 notes that passive (motorised travel) will play an important part for the future. However, no reference is made to how this can be tackled and a reduction in car dependency and trips, especially within parish (e.g. school and Jempsons), can be achieved.</p> <p>There is considerable reference under the road safety section to speeding, which is being evidenced using black cat monitoring. The data cited refers to 85%ile speeds. In setting appropriate speed limits, the County Council’s policy (which is based on national guidance) considers mean (average) speeds and the road environment.</p>		
						<p><b>Appendix 2 and the traffic data report</b></p> <p>The inclusion of this is welcomed, and a few suggested amendments are outlined below.</p> <ul style="list-style-type: none"> <li>• Welcome the use of data relating to 2022. This is now being recognised as not influenced by the Covid-19 pandemic.</li> <li>• Some of the data presented is in the school holidays, whilst other data is during term-time, which can make direct comparisons between term-time and holidays challenging. All data should be from a neutral month during school-term time.</li> </ul> <p>Other graphical suggestions are submitted.</p>		
						<p><b>Development site comments</b></p> <p><b>PM01 Flackley Ash (Page 79)</b> At the Regulation 14 Consultation stage we stated; ‘The speed limit on Mackerel Hill is derestricted (60mph) and actual vehicle speeds are unknown. ....Mill Lane bus stops are within a very short walk but infrastructure is required to support connections to the bus stops.’ We recognise that the accessibility issues have now been referenced. However, we would point out that a change to the speed limit is not straightforward. It relies on speed surveys and any on road measures required to reduce the approach speeds so that the speed limit becomes self-enforcing. Changes to a speed limit will need to be through a Traffic Regulation Order, which is subject to consultation.</p> <p><b>PM02 – Woodside (Page 81)</b> The revisions do not consider the access comments provided previously as part of the Regulation 14 Consultation. A roundabout is not an appropriate access for such a small number of dwellings and a crossroads with Tanhouse Lane would constitute conflict with the busier access. It is recommended that the principle of providing a suitable access is considered further in order to demonstrate the deliverability of the proposed allocation. No reference is made to public transport links.</p>		
						<p><b>PM04 Orchard Way – 5 dwellings (page 82).</b> As per our Regulation 14 Consultation comment; This site is served from the 30mph section of Main Street. The access road is single track and already serves a number of dwellings (4 from a desktop study). The access width with Main Street is required to be 5m wide minimum to allow entry and egress safely, and to prevent unnecessary waiting in Main Street. For additional dwellings, a refuse truck will require to enter, turn and exit and any proposal would need to accommodate this. A crossing point for pedestrians would be a requirement to allow access to nearby primary school and Horse &amp; Cart PH (although this looks like it has closed down recently). We are concerned that these concerns regarding access provision cannot be addressed and so the site’s deliverability is questioned. A crossing point could be requested as part of a highway consultation response to any future planning application, but scope to deliver this now is likely to be limited.</p> <p><b>PEA L01 Cornerways - 7 dwellings (page 83).</b> Whilst the highway and access issues are correctly identified in the plan, it should be pointed out that until it can be demonstrated that these issues can be appropriately addressed that the deliverability of the site has not been demonstrated.</p>		

**Submission Peasmarsh Neighbourhood Plan Representations**

						<p><b>Education</b> Our current pupil and Early Years (EY) forecasts (Summer 22) are higher than the 95 units the Peasmarsh NP envisages, therefore, it is unlikely that the levels of housing envisaged by the NP will lead to higher pupil and EY numbers over the period to 2038/39 than are assumed in last summer's update to our forecasts. In conclusion, the amount of housing foreseen by the Peasmarsh NP is unlikely to give rise to a requirement for additional school or early years places in the area.</p> <p><b>Culture and Tourism</b> <b>Policy E4</b> (page 60). We welcome the inclusion of policy E4 and support for the tourism sector. There may be an opportunity to link this to the ambition for EV charging points. A tourism business that can offer EV charging is planning for the future but there could be shared community benefits to be had, as well.</p> <p><b>Public Health</b> Most of our previous points in response to the Reg 14 Consultation have now been incorporated into the Reg 16 version.</p> <p><b>County Archaeology</b> We are satisfied that the Historic Environment Record was consulted and that archaeological heritage has been appropriately considered.</p>		
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