Comments on Draft Local Plan from Sedlescombe Parish Council

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| Section | Comment |
| Q1 | The ambitious vision is supported along with the aim to future proof the work. In the context of challenging times, meaning constraints on budgets and funding, the statutory and VCSE sectors required to deliver these ambitions are under pressure. There should be a recognition of this in the aims.  Will the infrastructure be in place to support.  “village clusters” -Fairly aspirational- no mention of supporting shops/ services/ additional school places + “public transport” doesn’t show increased development  Asking for all developments to be net zero is laudable but may be an issue as part L building regulations do not require this. Is it possible to have policies which are in conflict or go beyond building regulations?  Missing is access to rail travel with better integration between road/bus and rail services.  The assumption seems to be (3rd paragraph on page 19) that we are talking about travel within the district, and train travel is explicitly excluded. Travel within the district should be enhanced but coordinated better, especially train travel, to areas further afield.  Links to Eastbourne, Brighton, London and Ashford (potentially then also for re-instated Eurostar service to the Continent) are all relevant here. |
| Q2/Q3 | The two overall priorities are well defined.  Missing is promoting housing for new ways of working and for those who live in the countryside but away from villages. Policies are currently too restrictive to allow for sustainable development away from villages through live work units. The local plan needs to catch up with the services that now can be provided away from villages including home delivery of groceries and other shopping and on line daily publications.  There are currently inconsistencies regarding access to transport, particularly for rural communities.  There should be reference to the RDC anti-poverty strategy as it is linked to many of the goals. How will loneliness be addressed.  The challenges faced by an ageing population need more attention.  Under the last bullet point on page 24, the only issue mentioned is that of accommodation needs. Transport needs in rural isolation is a big issue for the elderly.  Something is needed about providing starter homes (e.g. cottages, smaller properties) in order to retain young people in the district and allow them to stay in the village they grew up in if they want to.  Improved health” is complicated when GP no.s are depleting, individual aspects of well-being are complicated when Social Prescribers are not fully understood, social interaction is well supported by HVA etc, infrastructure networks lack of detail. Better access to jobs needs strong link to education as does needing employment needs and rural employment offer, making more sustainable needs detail. Range of accommodation is good.  Construction industry not yet capable of meeting standards” = raising costs. |
| Q4 | Objectives should be quantified otherwise they can’t truly be measured and achievement properly assessed. These are more aspirations than objectives.  How are Rother going to deliver affordable housing. The availability of affordable housing continues to decrease. It would be beneficial to have a more specific target that clearly addresses the housing crisis head-on. What is the exact definition of affordable housing given the average wages in Rother.  There’s no mention of co-design or co-development in the objectives, but this may be addressed in the specific plans and strategies that will help to achieve the objectives.  in objective 4, no mention is made of the housing needs of younger people.  Under objective 8, there needs to be greater coordination between the transport providers and there should be specific mention of rail. It important that when residents want to travel to Brighton, London, Eastbourne, or further afield they know that the the bus will be on time and that it will connect with train services otherwise it’s always easier to go by car.  The wording of objective 4 as it implies that protection of the National Landscape is subservient to sustainable development. Preserving the National Landscape should be sacrosanct and policies ensures that development occurs which is sensitive to those conservation needs. |
| Q6 | Please check whether BREEAM is actually available for conversions. It may only be available for larger developments.  Setting of local energy efficiency standards which are above the National Minimum Standards is supported.  Measures such as solar PV and heat pumps need to be explicitly included in all planning applications unless good reasons can be supplied as to why they are inappropriate for any given development |
| Q7 | It is important to achieve higher standards but what standards is this question asking about?  High standards must balance with escalating costs in an impoverished area |
| Q8 | Consider the cost to developers of the additional requirements and how this may suppress building through increases costs? |
| Q9 | Agree  Older buildings may not be able to achieve this. Where will the funding come from to retro fit homes.  There will be many older buildings (and listed) in this area for which the refurbishment standards will be impossible to achieve  Retrofit is a good example of renew & recycle. |
| Q10 | lack of data  re construction waste increases delays |
| Q13/Q14 | Does this conflict with building regulations – the review due to start spring 2024 could now be delayed?  Water efficiency is important in this water stressed area.  Given the recent water disruption, the local plan needs to influence the water companies to act more responsibly.  “Encouraging” rainwater recycling is not sufficient: new planning applications should, as with energy efficiency, be required to incorporate rainwater capture and other efficiency measures or otherwise demonstrate why they would not be suitable for any given development.  Details of trialling litres/day would help social understanding.  Ensuring grey water storage at new builds or refurbishments would encourage good practice. |
| Q15 | If developers are making contributions to District Heat Networks what is the plan for setting those networks up. Surely they should be part of a development? |
| Q16 | The local plan should show actions and outcomes for clearer understanding |
| Q17 | These policies appear to all be ‘subject to other policies’ which may make them effectively neutral policies. In favour and the subject to policies should be strongly tested before these policies are rejected. |
| Q18 | A wind farm off the coast may be feasible and have less impact than on land in Rother?  To ensure facts and linked actions are shared with local society it would be good to understand [possible sites. |
| Q20/21 | Aspirations are sound, there should be support for local councils to help fulfil this initiative. Work should start now through the local plan and neighbourhood plans. |
| Q22 | The BNG formula is a blunt instrument which fails to measure true BNG increases as it focuses on grass hedgerows and tress and fails to include other more effective true habitat creation. The BNG formula treats concrete with the same score as improved grass which is nonsense. A BNG of 20% can only be supported by a strong needs evidence base otherwise the statutory 10% is the default. It is unlikely in Rother given the high level of trees, grassland and hedges that there will be a need greater than 10%. It would be better to have the 10% gain and then supplement that policy with specific qualitatively better biodiversity improvements (some examples are hibernacula, insect hotels, simple log piles to promote invertebrates)  The desire to include improvements in the natural environment is supported but there is work required in its delivery. |
| Q23 | May only be achievable at examination if you can demonstrate a need which (see above) may be difficult in Rother. Every opportunity should be supported. |
| Q24 | More qualitatively stronger BNG requirements rather than a simple uplift from 10%. The formula is easy to manipulate so more specific requirements will be better at achieving actual BNG gain. |
| Q25 | This is simply repeating the NPPF and Crow act so is largely not needed. The new HWNL management plan should be used to guide the district approach. |
| Q26 | The terms small and large should be defined. Is small 5 or 15? Is large 10? Less subjective wording should be used. |
| Q27/28 | The policy on compact land use is too simplistic.  The policy sets minimum densities and encourages higher densities which seems to be in conflict with ‘healthy living ‘  Building density should reflect the local area. There will therefore be sites in rural areas, including Sedlescombe, where high density land use is highly inappropriate, but others where denser land use could be considered.  The density of development should above all be in keeping with the local area and provide for a range of housing needs – a “one size fits all” approach is unlikely to achieve this. The land density figures quoted could mean that only detached houses with gardens can be considered in rural areas.  This could lead to identikit development, even if on a relatively small scale. Each road will have a density that is appropriate to it – above all, developments should fit in with what is already there.  Compact development makes good use of space for the whole community but it must have supporting infrastructure for family daily needs. |
| Q30 | This policy seems to be ignoring that it is quite possible and normal to live happily away from these services and amenities due to home delivery/ the internet and demand led transport. Demand led transport stops outside a person’s door which inherently makes all locations acceptable. The policy is trying to be too prescriptive. In addition, making specific developer contribution requirements as policy may be counterproductive as a community may want or need different planning gains to those set out in the policy on community meeting places.  Access to services via safe walking routes is not realistic in rural areas. People may choose to live on the outskirts of a village and given the way we shop has changed in terms of home deliveries, how important is it to be close to these amenities. |
| Q32 | The walking 800m (on average a 10min walk) requirement is too prescriptive and ignores truly sustainable development. Not everyone wants or needs to live in or next to a village. |
| Q33 | DRT operates everywhere so this policy allows for development in places which may be unsuitable for large developments. However, DRT makes small or single property developments completely accessible (and in fact more accessible) to regular transports than exists on main bus routes or in villages. This opens up development to locations previously not well serviced by public transport. This policy does not take into account rural areas that could not provide walking and wheeling routes. |
| Q35 | Access to public transport is important and within a safe walking distance. It may impact on development if too difficult to include and does not consider the very rural nature of Rother. |
| Q36 | All meritable aims but do they conflict with Highways regulations and therefore make them unenforceable particularly in relation to point vi ‘Through Traffic’ ?  There needs to be different approaches for rural areas, particularly in materials used to ensure that the rural character is kept. |
| Q38 | Beneficial actions for future generations- outside town parking- park & ride but how does this work for rural communities. The lift scheme in Sedlescombe has been hailed by NALC but is more and more difficult due to lack of volunteers. |
| Q39 | Much of this repeats NPPF/CROW or the High weald guide. Perhaps the policy should not try to repeat policies found elsewhere? |
| Q42 | Would these and other policies be better set out in a design guide which could be updated during a local plan period. This would ensure any unforeseen circumstances can be adjusted after the plan is made?  build form- active frontage very prescriptive |
| Q46 | A requirement for Ultra-Fast fibre is missing |
| Q47 | For communities this could be a good benchmark or at the very least checking for key uses to support the local community. The case studies contained within the toolkit are useful and would need developing to fit the local rural area. |
| Q48/49/50 | Show the trials and outcomes. |
| Q51 | Rural communities are attractive but can overwhelm the services of health and education |
| Q52 | The cluster for Sedlescombe is understandable except there is no connecting bus service to the village. If you live outside the village the DRT is available which is of course in conflict with most of the policies. I would expect most people shop in Tesco/Asda/Lidl and Sainsbury in Hastings. How about a shuttle bus between Sedlescombe and Battle if that is the Sedlescombe hub centre. |
| Q54 | There are currently a significant number of brownfield unused sites in Rother. Rutherfords is a good example. Given the shortfall in storage facilities what incentives can be added to the policy to bring these ,often derelict sites. back to use? |
| Q62/63/64 | Sedlescombe is limited to the amount of housing growth it can accommodate. The single site identified in Sedlescombe is shown as only fair sustainability. It is in a poor location at the end of a cul de sac with a footpath running through the site. The site is very steep on one side and is very open to the landscape on the opposite side. This site was rejected in the previous SHLAA and the ESCC landscape assessment. The access is poor and potentially may trigger disputes with the neighbours on each side of the access drive. Before allocating this site or asking The Parish to assess it for the SNP update the landowner should provide clear evidence of its deliverability without a viability assessment. The site was originally rejected by ESCC Highways.  Sedlescombe potential site SED0020. This site was rejected in the previous Dasa . The site was assessed in the previous East Sussex Landscape assessment done for RDC. The document was : Rother District Council Local Development Framework Core Strategy: Market Towns and Villages Landscape Assessment August 2009 Volume 1 Its comment on this site is attached and clearly shows it is not recommended for development. Please see appendixes  It is interesting that the importance of Battle to Sedlescombe is noted and other villages locally (section 5.56 p144).  However, this importance is not reflected in transport plans elsewhere in the document and this needs to be highlighted much more strongly.  For example, the map of the whole district on p. 144 shows only north-south links such as the A21 and the railway line which therefore implies that movement across the district is primarily north-south.  Sedlescombe already suffers from poor pedestrian access to village facilities (shop, pub, playground) and therefore are the areas mentioned on p144 are suitable for the kind of developments that are going to match the  objectives listed by the Plan. There should be provision in the plan to identify an appropriate land use density (see point under 27-29) for each site. |
| Q71 | There needs to be a good roadway to encourage access to Hastings and area not to be confused with cycling & walking this must be safely provided alongside. |
| Q76 | Sedlescombe & Westfield is high and must have supporting services. Green spaces are very important. It appears unrealistic with the categorisation and being less sustainable areas. |
| Q80 | It would be nearly impossible for a comprehensive plan to be developed when a developer does not own the whole site. The policy is aspirational but would simply put developers off as it would be unachievable. |
| Q87/89 | Small sites come forward far quicker than larger sites and the policy should include incentives to promote this further. |
| Q94 | Meritable but what is the expected outcome. Developers are very good at justifying developments. |
| Q99 | How does the local plan support the voluntary sector with regards to providing community groups/hubs? |
| Q116/117/118 | No affordable requirement should be required on sites of .5 hectares or more where the development for very small schemes as already set out in the explanatory text in the current core strategy/DASA y which says:  ‘*There may be exceptional cases where affordable housing cannot be provided onsite, in which event a financial contribution11 equivalent to the increased value of the development without on-site provision will be required. Financial contributions11 will not be sought on very small schemes, below the 2019 NPPF’s thresholds’*  This is not clear in the proposed policy and is underpinned in the NPPF and supported by two recent appeal decisions. |
| Q119 | Support 100% schemes as long as they include mix tenures of social, first home and shared ownership |
| Q120 | Mix up affordable, shared ownership etc., |
| Q123 | This appears to be a repeating of policy on exception sites. |
| Q133/134 | Large Care Homes can drain GP services and need transport for staff- smaller units can be more community focused. |
| Q135 | It would be far better to have clearly allocated sites as opposed to opening the district up to G and T sites in any viable location which will conflict with policies for all other housing! |
| Q140 | Positive with focus on children in villages being able to remain in adult life. |
| Q142 | This could be broadened slightly to include small gaps in linear developments on main roads which have access to DRT and also live work units. In addition, consider housing which supports a live in rural training facility. |
| Q143 | Agree |
| Q144 | To restrictive. There are many houses in villages which are small and have very little outdoor space which are happily occupied. In rural areas residents in small properties have access to the significant number of footpaths and playing areas allowing for more than enough outdoor space.  no mention of allotments |
| Q149 8.170 | Agree |
| Q151 8.174 | Agree |
| Q153 8.175 | Agree |
| Q157 | It needs to be strongly linked to education, encouraging unemployed to follow college courses is a future investment |
| Q170 | Point xi is an unreasonable and unsafe policy. The creation of a new agricultural track is made to service farm vehicles which by there nature can be dangerous for pedestrians. Rother has a large and comprehensive network of PROW’s and this policy seeks to unreasonably force access over private land . In addition, a legal conflict may occur to condition a permissive path.  Point ix. It is highly unlikely that a new track could ever conserve and enhance the landscape. Therefore, this policy point simply seeks to stop any new agricultural tracks which is unreasonable. |
| Q172 | The policy related to holiday lets only being allowed if they use redundant buildings is unreasonable as a farm may not have a suitable building to convert but needs to diversify to maintain the viability of the farm. This policy is too restrictive. |
| Q174 | This policy when added to Cil and affordable housing plus other contributions will suppress the delivery of housing as the combination of CiL and affordable housing has already seen to result in viability issues which result in the lack of delivery of affordable housing. |
| Q176 | This policy effectively stops or severely retards the development of equestrian facilities which make a significant contribution to the rural economy through farm diversification. Horses and their related facilities are very much part of rural life. The policy is over restrictive and clearly has the intention of suppressing an industry which makes a significant contribution to the Rother rural economy. The dispersed location of a facility whether it be stables or a sand school is normal in rural areas. This appears to be a policy written with a poor understanding of the role of horses and their related facilities in the countryside. It is over restrictive. The commentary on excessive fencing is too judgemental to include in a policy with no evidence base to support a policy which appears to have a negative approach to equestrian facilities. |
| Q178 | This policy appears to repeat national policy unnecessarily. |
| Q180 | The use of the word ‘appropriate’ makes the policy unclear as to what may or may not be ‘appropriate’. These needs rewording. |
| Q181 | Proposals that support the replacement of non-native trees and hedges with native trees and hedges should be supported. |
| Q183 | Add in that large glass areas can be acceptable with glass which prevents light pollution or where the building design ensures no or limited light spill. |
| Q184 | Recent flooding has crippled some businesses and private homes. |
| Q194 | Point iii Passiv houses cannot use bird or bat bricks as they must be airtight so this policy conflicts with the zero carbon policy. To achieve true zero carbon a building must be passiv. Therefore, this point of this policy needs revising. |
| Q199/200/201 | Air source heat pumps can be noisy and need to be located above ground. This could cause a conflict between carbon zero and noise policies.  Environmental issues due to sewerage. There has been an issue for a number of years with sewerage being pumped onto the allotments and draining down into the river. This is due to the pipes being old and unable to cope with pumping sewerage in Sedlescombe. The pressure on the system will be significantly increased with development sites that already have planning permission and should be carefully considered before any further permissions are given. |
| 204 | heritage should be saved where possible but equally funded public & private- adapt, upgrade & repair. |
| Q208 | The proposes Local Plan is introducing a wide range of controls which will add significantly to the cost of any planning application small (1 house) or large. This will have the impact of stifling new development across the district. |