



Pett Parish Council (“PPC”)

Comments on the Draft Rother Local Plan 2020-2040 (April 2024)

The PPC is in broad support of the policies proposed in the Draft Local Plan and is generally happy, and in agreement, with its aspirations. However, we consider that some of them, whilst commendable in vision and aim, will be hard to deliver for practical reasons, including financial. We have confined our comments to areas we think are directly relevant to our community. Where no comment has been made it should not be inferred PCC agrees.

As a general point of principle, PPC is concerned that there is very little included about the role of parish councils. Parish councils play an important role in reflecting the views of the community and in commenting on planning decisions. In particular, on the topic of exception sites (see *Policy HOU5, Item 8.51, Q123*) the role of the parish council has been removed altogether. See comments below.

Furthermore, in view of there being a new national government, further amendment by Rother, and therefore further comment, may be necessary once the government’s new legislation and policy, particularly on housing, becomes clear.

Q4 – Figure 6, Objective

The recent widespread closure of public toilets across the district seems to be in conflict with the aim to provide supportive policies for tourism and recreation uses within urban and rural areas.

Q4– Figure 6, Objective 4.

Maximise the potential opportunities for residential development in sustainable and deliverable locations. Some of the criteria (see point 4.30) seem rather unrealistic.

Item 4.30 (page 77) and Q33/35

Walking three miles on country lanes (where there may be no pavement or lighting) is not practical, particularly for residents with disabilities or those who are carrying shopping or pushing a pram, buggy or pushchair.

LWL6 and Q42/43.

There is no reference to drainage (other than surface water). Should there be a criterion that any development should have access to mains drainage (for sewage) or alternative solutions for the handling of drainage should be specified?

Item 5.49 (and other places)

The use of the term “Hastings fringes” is strictly speaking incorrect. The parishes concerned are not in the district of Hastings and therefore cannot be in its fringes. The term used for the district council area is 'Southern Rother' and using this instead of 'Hastings Fringes' should lead to fewer misunderstandings,

particularly by those who are not familiar with the area. Note that this will also match the use in the plan of 'Northern Rother'.

Item 5.133 (Green gaps) and Q90

It should be noted that the boundaries between Pett and both Guestling and Fairlight do not leave gaps, so that their separate identity and distinctiveness is not maintained. Parts of Guestling and Fairlight are physically and logically in Pett, with green space between these and the main parts of Fairlight and Guestling. While it seems unlikely that parish boundaries can be changed in the local plan, this anomaly should be noted and, at some time, we suggest, be rectified.

Policy HOU5, Item 8.51, Q123

The change of policy, so that parish councils no longer have to support or initiate the establishment of rural exception sites, is of some concern. This seems to mean that developments in a parish can be undertaken, even if the parish council is not in agreement with the development. This negates the role and purpose of a parish council, which is elected by and accountable to the community and can be taken to represent the views and concerns of the community, reflecting this back to the district council and in its decision-making and policies.

The proposed change has the potential to allow a small pressure group to initiate the possibility of a development *without* the general support of the community (through its parish council). We suggest that the role of the parish council should be reinstated. If the change is to be retained, then there should also be a clause stating that the community (through the parish council) should be consulted and its views given due consideration. It is difficult to see what other mechanism there will be for consulting the community and reflecting views and concerns.

Items 11.27/28/29

The flooding at Pett Level has not only involved surface water. Because the drainage in Fairlight is combined (surface water and sewage), when there is a flood, the flood water contains sewage. Various initiatives are being undertaken to cope with the situation. In addition to the Pathfinder project (in which Pett Level is now participating), included in these is the new Marsham Valley Natural Flood Management Programme, funded by the Environment Agency, which it would be good to mention in the local plan.

Item 11.36, Q191

It should be noted that the proposed Fairlight Coastal Change Management Area stretches into Cliff End, which is part of Pett Level and therefore has an impact on homes in the parish of Pett. It is essential to define the boundary of the area precisely to show which houses are included, which the map does not at present. Additionally, it should be made clear that the Pett Parish Council should be involved in and consulted on any proposal or developments that affect Cliff End.

Q200

While this is mentioned in the section on flooding, the pollution of, for example, Pett Level by sewage in the flood water could also be mentioned in this section, along with the proposed solutions.

Q203

It is not clear whether these are defined as heritage, but the submerged forest at Pett Level and the remains of the ship, the Anne, and, indeed, the wreck post, are all of historic value and maybe should receive a mention somewhere in the local plan.