

Submission on the draft Rother Local Plan by Etchingham Parish Council

19 July 2024

- 1) Etchingham Parish Council endorses the response already submitted by the Northern Parishes Group both on the draft Local Plan and in suggesting a specific policy for Bewl Water. However, it wishes to submit additional comments, both in regard to the draft plan and the supporting documents. Etchingham Parish Council, in common with the other northern parishes, finds much to welcome in the new plan.

HELAA

- 2) Dealing with the latter first, in relation to the HELAA, the Parish Council questions the classification of ETC0018 as it believes this site is suitable for a small number of starter homes and note that it is included as such in the draft Neighbourhood Plan. Etchingham has limited opportunities to meet its housing needs and would wish to see this site allocated. The Parish Council accepts that the land to the rear of Ladyfield (ETC0018) has a difficult access which may make it difficult to bring forward, but note that in other respects it is suitable for development without being visually intrusive on the wider landscape. It would further observe that the possible site on Church Lane would need to be laid out in a way that lessened its impact on the existing cottages and offered some relief to their parking problems. A possible layout is in the draft Neighbourhood Plan. The site will be contentious.

Infrastructure Development Plan

- 3) The Parish Council does not believe that the Infrastructure Development Plan should simply be a vehicle for the providers to furnish their views and believes that Parish Councils could be consulted with profit on rural projects. It believes that in many cases the projects identified, while clearly benefiting an area much wider than their immediate neighbourhood, do not have District wide benefits, an imprecise and demonstrably inaccurate term, at least in relation to the greater part of the projects listed. It wishes to draw your attention to two potential projects which would directly benefit the residents of Etchingham although not in the parish and one that would have major benefits for a large part of the District. An expansion of the primary care facilities in Burwash (the Fairfield Surgery), the provision of more extensive pharmacy services, and the combination of these developments with a community hub would benefit a number of parishes and a substantial number of residents, arguably more than the Robertsbridge project, although we are not to be taken as questioning the necessity for that project. Both are needed at a time when a major switch of funding to primary care services is in train.

Highway Drainage

- 4) Another focus of attention should be the Highways drainage which is antiquated and increasingly prone to overload.

The A21 The A265 junction at Hurst Green and the need for a Flimwell bypass

- 5) Another project which would benefit all users of the A265 would address the junction of that road with the A21 in Hurst Green. There are times of the day when the volume of traffic on the A21 is such as to delay egress by times that can run into double figures. A mini roundabout or conceivably the provision of traffic lights would address the problem. Finally, the Parish Council would draw your attention to a major omission from the IDP. Provision of the Flimwell bypass would greatly improve the flow of traffic on the A21, enable the re-opening of a stretch of dual carriageway, reduce accidents and do something to improve the "centre" of that village.

Waste

- 6) Another area of concern is the recent importation of massive quantities of soil onto a number of local farms e.g. Bardown at Stonegate, Sweethayes at Hurst Green, which either deliberately or simply in consequence of the scale of the importation has permanently altered the landscape. While this is of concern in itself, because the origin of the soil is unknown, it could have consequences for the current biodiverse make-up of an area. ESCC seems only interested in toxic waste and the Environment Agency seems unconcerned with the landscape effect of the licences it grants. Given the historic importance of the landscape with which we are dealing, such activity should surely be made the subject of planning application.

Landscapes and the High Weald National Landscape

- 7) It is concerned, however, at the relative absence of policies safeguarding the landscape, particularly that of the High Weald, which is of course not only of scenic value but is a late mediaeval landscape, among the most important in Europe. Were it a listed building it would undoubtedly be Grade I. Probably the most startling omission is the absence of any protection for the major valleys that grace the High Weald and are largely unspoilt. The Parish Council recalls in this context the care taken by Rother planners to ensure that the development at Parsonage Croft in the village did not have any intrusive impact on the middle reaches of the river Rother. Save at Etchingham itself, the Dudwell Valley in its entirety is largely unspoilt and that too has influenced many of Rother's planning decisions over the years. The valley floors can to some extent rely on their character as flood plains, but the Parish Council is worried about the potential visual intrusion of developments on the sides of the valleys, particularly scarp slopes. The Council believes that there should be a strong presumption, possibly an outright ban, on the development even of small estates, where their presence would impinge on the two valleys. Whether this can be made general or limited to specific valleys is for consideration, but the Parish Council would urge that a policy be developed to cover the point and that Parish Councils be consulted on the valleys to be included. Etchingham would certainly argue for the policy to apply to the Limden valley as well as to the Rother and Dudwell.
- 8) Consideration of the omission of a policy about waste leads the Parish Council to ask whether the High Weald is given sufficient protection by the general presumption that it should be conserved and enhanced, and it may be that, at the risk of some repetition, it warrants a short chapter of its own embodying specific policies to protect key features of the landscape. The High Weald Management Plan offers some policy guidance, but it is left for local plans to translate the objectives into policy guidance and the High Weald Unit is not a statutory consultee. Currently it is under-resourced. It is of considerable importance that historic features of the landscape like droveways, pond bays, and the mediaeval field system should be preserved. The Parish Council notes also that at least partially within its boundaries there is an unexplored earthwork, once mistakenly attributed to Julius Caesar, which merits protection. The Council asks that specific consideration is given to each of the objectives identified in the plan to see if and how best it can be translated into specific policies and that consideration is given to ensure that its historic features, including the many historic agricultural buildings unlisted, are protected. The transition from settlement to open countryside is of particular concern if the settlement pattern is to be safeguarded. It is also important that design is accorded a much higher priority when considering applications and it should be noted that not every street scene is of a similar character although overall the High Weald Design Guide can be usefully invoked.