

Rother Local Plan Regulation 18 Consultation Burwash Parish Council – Review

General Comments:

- Plan in general seems centred on urban areas with less regard for how the policies will be implemented or effect the more rural parishes.
- Dark Skies policy and wording seems to miss the point of dark skies. Its wider importance is to protect wildlife that rely on the dark skies for their habitat and survival and less about using specialist glass and mitigating general light pollution. Mitigation should be for urban areas but real care should be taken in rural areas where dark skies should be more definitely protected.
- Removal of chapter for rural communities from 2014 core strategy.
- Plan seems aspirational but concern remains about reality of implementation.
- Do not agree that the HELAA should be consulted alongside the plan document, too early in the consultation to have suggested sites identified and available as supporting documents.
- Plan is not truly accessible to all residents, too long, too many pages to read, too much understanding needed of the current planning process to clearly demonstrate everyone understands what they are consulting on.
- No clarity on how the sites in the HELAA have been identified, what the process and criteria is for selection and suitability and how that links back to parishes with Neighbourhood Plans.
- No clarity on how the identified sites effect those parishes with a neighbourhood plan.
- Policies indicate development boundaries have been weakened with no additional protection for the Natural Landscape.
- No clear summary, too many documents to trawl through to make a measured approach to responding, how many people have the time to do this?
- Complete lack of understanding between climate change and biodiversity.
- Language in policies is very subjective and rely on explanatory text rather than policy wording.
- Overall lack of recognition of rural elements including river ways, driveways, historic field patterns and medieval hedgerows all relevant to the rural areas.

1. What are your views on the Council's vision?

The Vision doesn't mention the needs and requirements of young people / families or the need for social and affordable housing. Better connectivity is required for homeworking and the way work is more flexible. Rural areas connectivity needs addressing.

2. What are your views on the proposed twin overall priorities to the 'Green to the Core' and 'Live Well Locally'.

Overall supporting but are aspirations and not reflected in the plan as a whole. 'Live Well Locally' not achievable with just affordable housing. 'Green to the Core' will require significant funding to be achievable.

3. What are your views on the key issues (listed at Para 2.13) that have been identified and is there anything missing?

A policy for retaining young people in the District is missing and the requirement for low paid workers, particularly in the Care Sector, should be considered. There should be a clear policy to encourage young people / families to offset the older generation.

4. What are your views on the Council's objectives for the Local Plan?

The objectives are good – however, can Rother realistically control / enforce the outcomes?

5. Are there're any alternatives or additional objectives and / or the ways to achieve the objectives that Council should be considering?

Rother should consider the needs of workers in the rural areas and there should be an objective relating to specific groups that have a housing need. Enforcement of the whole plan will be an issue and doesn't seem to be considered / mentioned.

6. What are your views on the Councils' proposed policy for Net Zero standards and which parts of the Policy do you support?

We generally support the ideals of the Plan, but unsure of the control method.

7. How important is it for Rother to seek to set high standards?

High standards are very important.

8. Are there any alternatives or additional points the Council should be considering?

More emphasis should be placed on modern construction methods.

9. What are your views on the Councils' proposed Policy for Net Zero refurbishment standards.

This is likely to be a very expensive process, 20% is highly unachievable based on current studies and overambitious.

10. Are there any alternatives or additional points the Council should be considering.

Older and listed properties will be a challenge.

11. What are your views on the Councils' proposed policy for construction material and waste.

Agree in theory but should include measures for control and enforcement.

12. Are there any alternatives or additional points the Council should be considering

No response.

13. What are your views on the proposed Policy for water efficiency.

Good.

14. Are there any alternatives or additional points the Council should be considering.

For new builds, water storage and utilisation of grey water.

15. What are your views on the Councils' proposed Policy for heat networks.

N/A.

16. What would be your preferred approach to carry forward in the Local Plan.

N/A.

17. What are your views on the Councils' proposed Policy for renewable and low carbon energy.

There does not seem to be any consideration for small wind turbines that could be incorporated into small clusters of houses.

18. What are your views on identifying broad locations for wind development.

The High Weald National Landscape should be taken into account.

19. Are there any alternatives or additional points the Council should be considering

Where there are rivers, consideration should be given to generation using waterpower. Large solar farms should not be visible from a distance in the High Weald National Landscape.

20. What are your views on the Councils' proposed Policy for Local Nature Recovery Areas.

The map of Local Nature Recovery Areas does not seem to be available.

21. Are there any alternatives or additional points the Council should be considering.

The Policy, when available, should include wildlife/wildflower verges.

22. What are your views on the Councils' proposed Policy for Biodiversity Net Gain.

Good.

23. What are your views on the Council going above the National minimum requirement of 10%.

Will it survive the appeal process?

24. Are there any alternatives or additional points the Council should be considering.

Consideration should be given to protecting mature trees in and around developments.

25. What are your views on the Council's proposed policy for the High Weald National Landscape?

Over reliance on High Weald Management Plan that is a real concern. The plan isn't comprehensive enough in protecting the National landscape and the local plans reliance on the HWMP leaves large gaps in protection.

26. Are there any alternatives or additional points the Council should be considering?

Consider strengthening protection of the National Landscape as a protected environment. Design guide in the plan doesn't give enough detail to eco house development.

27. What are your views on the Council's proposed policy on compact development?

Should contain detail on the size of the properties and not just density.

28. What are your views on the area types and densities proposed as a key driver to Live Well Locally?

Generally agree.

29. Are there any alternatives or additional points the Council should be considering?

Should consider the base level of housing need rather than profit of the developer.

30. What are your views on the Council's proposed policy on facilities and services?

Doesn't give protection or reference to existing footpaths or bridleways.

31. Are there any alternatives or additional points the Council should be considering?

No mention of the quiet lanes initiative making walking / cycling / riding safer.

32. Specifically, what are your views on the proposed mix of local amenities and the requirement, within certain area types, for new development to be located within an 800m walk of these amenities?

No reference to rural areas where footpaths and access to local amenities is limited.

33. What are your views on the Council's proposed policy on walking, wheeling, cycling and public transport (outside the site)?

No reference to making the activities safer on rural roads.

34. Are there any alternatives or additional points the Council should be considering?

Consideration for mobility scooters and electric scooters.

35. Specifically, what are your views on the requirements set regarding public transport, such as the 400m walking distance proximity requirement?

Rural areas not considered.

36. What are your views on the Council's proposed policy on walking, wheeling, cycling and public transport (within the site)?

Unsuitable for rural areas, only applicable to urban areas.

37. Are there any alternatives or additional points the Council should be considering?

Connection of rural footpaths to local transport hubs. Linking bridleways / current paths to create accessible routes.

38. Specifically, what are your views on the provision of Demand Responsive Transport, car clubs and car shares?

Demand responsive transport trial through Flexibus is a must for rural areas. Needs to be more widely accessible and relevant to the demographic of the rural areas and available to local hubs. Ideas of car clubs is outdated and tends to wane over time.

39. What are your views on the Council's proposed policy on distinctive places?

No mention of green spaces. Difference between rural and urban distinctive places that isn't outlined in the plan.

40. Are there any alternatives or additional points the Council should be considering?

Parish Councils aren't mentioned but are ideally placed to input local need into the planning of any DRT initiative. The local Flexibus was rolled out without considering the knowledge held by Parish Councils leading to separate meetings with the teams to iron out easily identified issues of need, destination and accessibility.

41. Specifically, what are your views on using the considerations in Building for a Healthy Life and Streets for a Healthy Life as a framework for assessing residential development?

Intention for this initiative are good. No inclusion of what initiatives are already in place and whether they would continue or be redeveloped.

42. What are your views on the Council's proposed policy on built form?

Looks sound on first reading. Mirrors some of the policies outlined by the HWMP.

43. Are there any alternatives or additional points the Council should be considering?

Mentions roof mounted solar panels but doesn't mention the more flexible solar panels that are now available or other incoming technology to support carbon neutrality.

44. Specifically, what are your views on prioritising solar orientation and form factor when designing new developments?

Prioritising solar orientation should be maximising solar orientation instead. Possibly to encompass extensions. Definitely a step in the right direction but the policy wording may lead to failure if it's kept as prioritising.

45. What are your views on the Council's proposed policy on streets for all?

Seems wholly aspirational with no real prospect of ever being able to be realised. Where could this possibility be realised?

46. Are there any alternatives or additional points the Council should be considering?

Dedicated 'Quiet Lanes' on existing local roads, especially rural roads where mixed use is encouraged daily.

47. Specifically, what are your views on using the ten 'Healthy Streets' indicators of the 'Healthy Streets Toolkit' when designing new streets?

No reality of this ever being realised in its entirety. Too aspirational to be realistic.

48. What are your views on the Council's proposed policy on multimodal parking?

Open to abuse and won't be a kept feature by LA or planners when designing new developments.

49. Are there any alternatives or additional points the Council should be considering?

Bicycle parking should provide space for charging and scooters? EV charging points for developments?

50. Specifically, what are your views on communal 'remote' car parking?

Suspect that it could be easily abused and not adhered to by planners.

51. What are your views on the Council's preferred spatial development options?

Seem sensible when looking at growth. Difficult when you have to read the unending supporting documentation too!

52. Do you have any comments on the merits of the alternative Spatial Development Options, that do not form part of the preferred development options – as explained in the background paper?

No comments.

53. Are there any other development options that the Council should consider as part of its Local Plan?

No.

54. What are your views on the Council's proposed spatial development strategy and proposed minimum targets for housing and employment growth?

Wording is open to interpretation and not tight enough. What does 'sensitive development in rural areas' actually mean, subjective and doesn't link back to other protective policies for rural areas.

55. Are there any alternatives or additional points the Council should be considering?

As above. Additional links between rural Rother and other hubs maybe.

56. What are your views on the vision for Bexhill?

Seem to be aspirational in terms of numbers and timescale. Difficult to achieve but the vision is good.

57. What are your views on the two broad locations for growth (west Bexhill and north Bexhill) and their growth potential in the Bexhill strategy area in figures 13, 14 & 15?

Seems sensibly evaluated.

58. What are your views on the potential sites identified in the draft HELAA that could accommodate more growth in Bexhill?

No comment.

59. What are your views on the vision for Hastings Fringes and surrounding settlements?

Not familiar with the terms 'Hastings Fringes', surely that is Westfield Parish?

60. What are your views on the distribution and opportunities for growth in settlements within the sub-area in figures 17, 18 & 19?

No comment. Sustainability could be an issue here.

61. What are your views on the potential sites identified in the draft HELAA that could accommodate more growth in Hastings Fringes and surrounding settlements?

No comment but seems to be very high numbers.

62. What are your views on the vision for Battle and surrounding settlements?

Transport links are more defined between Battle and northern Rother parishes.

63. What are your views on the distribution and opportunities for growth in settlements within the sub-area in figures 21, 22 & 23?

Some are far outside of the Battle hub. Quite ambitious.

64. What are your views on the potential sites identified in the draft HELAA that could accommodate more growth in Battle and surrounding settlements?

Again sites have been identified outside of the main hub so are they sustainable / achievable?

65. What are your views on the vision for Rye and the eastern network settlements?

Question over sustainability.

66. What are your views on the distribution and opportunities for growth in settlements within the sub-area in figures 25, 26 & 27?

Hard to see how the opportunities will be achieved or realised.

67. What are your views on the potential sites identified in the draft HELAA that could accommodate more growth in Rye and the eastern network settlements?

Sites seem small and not sustainable.

68. What are your views on the vision for Northern Rother?

Overall aspirational as a vision. Employment opportunities in rural parish is overstated. Provision for 21st century working reality. The vision should include

protection of the unique river valleys along the Rother and Dudwell and the 'droveways' from the valleys and the green spaces between settlements.

69. What are your views on the distribution and opportunities for growth in settlements within the sub-area in figures 29, 30 & 31?

Employment opportunities overstated for Burwash Common. Higher Nature site now been sold to ENN and Rother can speak to them about. Some of the sites identified in the HEELA are unsuitable for development.

70. What are your views on the potential sites identified in the draft HELAA that could accommodate more growth in Northern Rother?

Some of the sites are not acceptable for development that have been identified in the HELAA.

BUR0019 – Site is a registered ancient hill fort and is registered with the ESCC archaeological society.

BUR0035 – Development of 6. Believe the previous owners submitted the site. Feeling is that if it was submitted as a subdivision of property it could work as a site.

BUR003 – Is not suitable no access, hugely contentious development. This site has already been rejected by planning and should not be considered.

BUR0010 – Potentially suitable if the site comes forward. Concern about the number suggested on the size of the plot.

BUR0031 – Potentially suitable if the site comes forward. Concern about ribbon development, possible backfill and suburbanization.

BUR0032 – Potentially suitable if the site comes forward. Concern about ribbon development, possible backfill and suburbanisation.

BUR0020 – Understand that this site has been sold to a plastic recycling company and will be used for industrial purposes.

BUR0027 – Would be highly contentious, possible problems with access onto the A265. Could be developed if it comes forward with careful management. Concern about it being an extension of the ribbon towards Broad Oak.

BUR0034 – Commercial employment opportunities are overstated. HELAA is incorrect, there is no dwelling on the site. Current owner tried for permission to turn a brick barn with a chimney into residential use but it was refused. Area highlighted on the map is not accurate as it includes a neighbouring garage and access driveway that isn't part of the curtilage. Burnt House Farm is a conservation area that has protection. Essential that any changes are not visible across the valley. Current flooding would be made worse by introducing more tarmac. The driveway and access road referred to is private and there is a neighbour covenant on the land. The current owner has said they will not allow access for vehicles to the site along the lane. Access to the A265 is very dangerous. Original access to Burnt House Farm has to be moved because of safety concerns. Current owner of Burnt House Farm Vineyard has buried waste on the site, live enforcement case. Land is now contaminated.

71. What are your views on a potential 30-year vision for the A21 transport corridor?

Vision for the A21 transport corridor is aspirational and is commendable but there has to be a plan to develop the east / west transport corridor and to plan for any increase in traffic on this road. Consideration should be given to removing lorries from the A265.

72. What are your views on the vision for Rother's countryside?

Vision seems well balanced.

73. Are there any alternatives or additional points the Council should be considering?

Allocation and support for working from home, increased connectivity. Intensive farming could also been addressed.

74. What are your views on the proposed policy for Sites for Gypsies, Travellers and Travelling Showpeople?

Careful consideration should be given to enforcement of sites and overspill, or any increase of pitches on sites. Clear and concise policy needed with little room for subjectivity.

75. Are there any alternatives or additional points the Council should be considering?

No.

76. What are your views on the district-wide development potential for the Local Plan up to 2040 which is presented in 4, 35 and 36?

Hard to see how the numbers won't have a harmful effect on the National Landscape. Burwash is outlined as a medium growth area. Disagree, low growth if the applications already in build are included in the numbers.

77. Do you agree with the principal identified by the Council of achieving a stepped housing delivery with greater levels of delivery planned for later in the plan period?

Yes, see the sense in back loading the delivery but still needs to be suitable development in the first instance.

78. What are your views on the Council's proposed policy on general development considerations?

HWMP and design guidance within it should be noted.

79. Are there any alternatives or additional points the Council should be considering?

Active travel in the locality could be included.

80. What are your views on the Council's proposed policy on comprehensive development and masterplanning?

Amenities and community assets are built out first. Viability reports to be challenged if deemed not achievable, permissions withdrawn.

81. Are there any alternatives or additional points the Council should be considering?

Removal of affordable housing should be directly linked as a condition and not be able to be reversed if viability then shown not to be achieved. Should be linked to outline permission so permissions lost if not build out.

82. What are your views on the Council's approach to development boundaries?

Wording of the policy is concerning. Rewording of the policy removes many of the protections that were in place for encroaching developments outside of the agreed boundaries. Reading the new policy it seems that there are loopholes available for development in the countryside if the development hits any of the markers outlined in other policies including affordable housing, etc. The wording of the policy and the loopholes within it leave the protection of the AONB questionable. Natural Landscape isn't protected at all when reading this policy.

83. Are there any alternatives or additional points the Council should be considering?

Be explicit in wording regarding the protection of the Natural Landscape. Too open for interpretation and subjectivity. Interpretation of major/minor housing. Small numbers to count in NP.

84. What are your views on the Council's proposed policy on the retention of sites of community and commercial value?

Property values should be realistic.

85. Are there any alternatives or additional points the Council should be considering?

Evidence required for appropriate marketing could be outlined in detail to show proof of marketing.

86. What are your views on the range of uses that are covered by this policy?

Good.

87. What are your views on the Council's strategy approaches to small sites and windfall development?

More sites could be identified in neighbourhood plans for smaller rural areas if the number was kept small.

88. Are there any alternatives or additional points the Council should be considering?

As above.

89. What are your views on the Council, based on evidence, targeting a greater percentage of housing to come from smaller sites than the expected 10%?

Needs to be more realistic in terms of percentage for smaller rural areas.

90. What are your views on the Council's approach to strategic gaps and those that are identified?

Lack of clarity on development boundaries and their retention makes strategic gaps much more important. No gaps identified in the rural other areas, Burwash to Etchingam, Burwash to Brightling, for example. No protection or identification to prevent urban spread from villages / hamlets. Removal of Location of Development policy makes it less clear and open to more interpretation,

91. Are there any other areas of the district that the Council should be considering, and if so, what evidence is available?

Yes, more rural areas and the importance of the strategic gaps between villages. This policy. Like others, centre on larger towns and centres with no consideration of how they could be used to abuse the more rural parishes.

92. What are your views on the Council's proposed policy on supporting health and wellbeing?

Aspirational policy but implementation is hard to achieve. Not realistic especially in rural areas.

93. Are there any alternatives or additional points the Council should be considering?

Little or no consultation with GPs in rural areas regarding capacity and needs of people in rural areas. Realistic implementation of the policy needs looking at. Size of gardens?

94. What are your views on the Council's proposed policy on requiring a Health Impact Assessment for certain applications?

Excludes rural areas. Most rural areas have deprivation, not all affluent and this isn't addressed in the policy. Hidden poverty in rural areas matched with lack of or diminishing services.

95. Are there any other types of application, and/or different scales of development, the Council should be considering?

Rural areas as above.

96. What are your views on the proposed policy for reducing harmful impacts on health?

Good policy.

97. Is the Council considering the right types of commercial uses or should it be considering other uses?

No.

98. What are your views on the Council's proposed policy on community and social facilities and services?

Good policy.

99. Are there any alternative or additional points the Council should be considering?

No.

100. What are your views on the range of uses that are covered by this policy?

Good.

101. What are your views on the Council's proposed policy on green and blue infrastructure?

Good policy.

102. Are there any alternative or additional points the Council should be considering?

No.

103. Do you feel that this policy is sufficient to protect open space?

Yes, infrastructure is key here to protect green spaces, drainage, etc.

104. What are your views on the Council's proposed policy on public rights of way?

CIL payments are small in comparison to overall development cost and gain to Rother. Unbalanced in grant system currently with small parishes not being able to access grants for infrastructure if always based on build in the area. 100% affordable means no infrastructure delivery.

105. Are there any alternative or additional points the Council should be considering?

Wider plan for rural Rother. How is the CIL pot divided across rural Rother. Viability of build is routinely ignored. No consultation with rural GP practices so little or no knowledge of rural needs.

106. What are your views on the Council's proposed policy on the Combe Valley Countryside Park?

No comment

107. Are there any alternative or additional points the Council should be considering?

No comment

108. What are your views on the Countryside Park being something the Council should continue to support?

No comment

109. What are your views on the Council's proposed policy on strategic infrastructure requirements?

No comment

110. Are there any alternatives or additional points the Council should be considering?

No comment.

111. Specifically, what are your views on requiring the submission of appropriate evidence to demonstrate that there is, or will be, sufficient infrastructure capacity to meet the demands of a new development?

No comment.

112. What are your views on the Council's proposed policy on digital connectivity?

Policy only deals with major development mentioned. Big issue in rural areas. Needs addressing at a lower level of development too.

113. Are there any alternatives or additional points the Council should be considering?

Rural areas considering working from home as the new normal.

114. What are your views on the Council's proposed policy on mixed and balanced communities?

Definition of larger developments being 6 or more, is that right? Does that constitute a major build?

115. Are there any alternatives or additional points the Council should be considering?

Local housing need. Detail of policy in line with vagueness of most policies. Needs more clarification on wording leaving less to subjectivity.

116. What are your views on the Council's proposed policy on affordable housing?

Emphasis on young people buying first homes not mentioned here. Does shared ownership form part of the policy of affordable housing in the plan?

117. Are there any alternatives or additional points the Council should be considering?

Local needs plan. No mention of parish councils and the impact on rural communities linked to infrastructure.

118. Do you consider that prioritising affordable housing or the Community Infrastructure Levy is more important for Rother?

Young people are key to the survival of smaller rural areas. If the policies are written to reflect the balance between infrastructure and affordable housing being available, this links directly to enforcement on planning permissions given to developers based on affordable housing allocation that is then taken away once viability studies are completed. Permissions linked to affordable housing need to be enforced.

119. What are your views on the Council's proposed policy on 100% affordable housing developments?

How does this effect parishes with Neighbourhood Plans. No mention of Parish Councils. No distinction between urban and rural areas but they are very different in terms of infrastructure requirements. Local need not defined as the need of the individual parish. No mention of 100% affordable in Bexhill?

120. Are there any alternatives or additional points the Council should be considering?

Cap on numbers in rural areas could be considered?

121. What are your views on the Council's proposed policy on allocating sites for wholly or substantially affordable housing?

Not clear why this policy is needed. Isn't this covered in exception sites? Significant change to previous policy with the removal of the need to be adjacent to the boundary. This could open the countryside to wider developments. The only limitations being proximity to amenities under the rules given, does this mean developments can be built in the countryside as long as they are within 400 m of a bus stop? How does this protect the Natural Landscape, how does this protect rural areas as a whole?

122. Are there any alternatives or additional points the Council should be considering?

Consider removing the policy in it's entirety.

123. What are your views on the Council's proposed policy on rural exception sites?

This policy is completely undermined by HOU4. If HOU4 is allowed, exception sites will not be considered by developers as HOU4 is an easier way to get development in the rural areas, outside the development boundary without considering the local need. No consideration of how the policy plays out in reality in rural areas.

124. Are there any alternatives or additional points the Council should be considering?

As above.

125. What are your views on the Council's proposed policy on the sub-division of dwellings, and Houses of Multiple Occupation?

No comment.

126. Are there any alternatives or additional points the Council should be considering?

No.

127. What are your views on the Council's proposed policy on residential internal Space Standards?

Aren't these delivered from Government level as standard measures?

128. Are there any alternatives or additional points the Council should be considering?

No.

129. What are your views on the Council's proposed policy on access standards?

Aren't these delivered from Government level as standard measures?

130. Are there any alternatives or additional points the Council should be considering?

No.

131. What are your views on the Council's proposed policy on specialist housing for older people?

Should this not be explicitly outlined in HOU2? Large need for specialist housing for the elderly in rural Rother.

132. Are there any alternatives or additional points the Council should be considering?

Could outline the needs and policy within the key housing policies for rural areas.

133. What are your views on the Council's proposed policy on residential Care Homes for older people?

No consultation with GP surgeries? Consideration of access, what is the definition of access to services and transport? Term 'robustly justified' needs to be in the policy. Wording on explanatory text is too open to interpretation and is subjective to planning officer, developer and member interpretation. Should be defined in policy wording as in economic sites to avoid any doubt. Demographic of area suggests that need will be increasing over the years. Quoting of the HENDA seems at odds with what is known. Conflicting guidance on need. Don't understand where the information comes from suggesting that there is no growing demand? If that is the case evidence needs to be supplied within explanatory text. No reference of point or paragraph given for the HENDA. Builds being currently passed for care homes state need in the area, at odds with this policy and statements within.

134. Are there any alternatives or additional points the Council should be considering?

No.

135. What are your views on the Council's proposed policy on Gypsies, Travellers and Travelling Showpeople?

Must ensure that the policy wording is clear and explanatory text is not open to interpretation. Safe access as defined by Highways? Very important for clarity to be given on balance of need versus National landscape damage. Nothing in the policy regarding potential alternative provision. Provision needs to be made to protect further the National Landscape. Small scale being 10 pitches is very large, if site has potential to scale up then too much with no enforcement to back up policy. If not regulated can become a huge problem. Increase of application recently, more efforts need to be put in to find suitable alternative sites. Open sites should be viewed with caution with clear limitations within the site to stop ongoing expansion.

136. Are there any alternatives or additional points the Council should be considering?

No.

137. What are your views on the Council's proposed policy on Self Build and Custom Housebuilding?

More robust policy than before. Not clear on where modular housing comes in. Not really applicable for Burwash area in terms of frequency of sites being delivered or required.

138. Are there any alternatives or additional points the Council should be considering?

No.

139. Specifically, what are your views on the threshold for developments to provide serviced plots for self and custom housebuilders?

Good to keep the thresholds low as agree that it could offer and bring more sites in rural areas.

140. What are your views on the Council's proposed policy on new dwellings in the countryside?

Removed rural areas portion of the policy in previous local plan. Why would accommodation for farms be on a temporary basis? Concern over the statement regarding development boundaries in para 8.118. Does point 5 of the policy open up the ability to build care homes in the High Weald, concern. Development boundary already outlines where development is allowed, so many policies are giving a clause to allow development outside of the defined boundary putting the AONB at risk. Second homes and enforcement of the primary and secondary residence is very difficult to uphold and prove.

141. Are there any alternatives or additional points the Council should be considering?

No.

142. What are your views on the new criteria (vi) which would allow for single or pairs of small-scale dwellings as "in-fill" development outside development boundaries?

Does depend on the individual sites. Open to abuse and interpretation. Boundaries are set for a reason, if flouted then you run the risk of presenting an urbanised frontage. Green gaps and spaces allow for keeping existing rural nature. Urban creep is a concern in rural areas. Specific criteria should be given before allowing 'in-fill' sites. Residential curtilage issues and what happens to agricultural land, mostly green gaps made up of agricultural land in rural areas.

143. What are your views on the proposal to limit the occupation of all new dwellings permitted under this policy (other than replacement dwellings) to that of a primary residence (and prevent use as a second home or holiday accommodation)?

Highly agree with limiting the occupation of new dwellings as primary residence. Consideration should be given to

144. What are your views on the Council's proposed policy on external residential areas?

Mentions of external amenity areas shouldn't be sloping or awkwardly shaped is not in line with the Strand Meadow planning application that has been passed by RDC.

Car parking requirements in this policy have been used by developers in Burwash and misinterpreted.

Cycling in rural areas is limited, cycle storage not a deal breaker for rural areas. Waste and recycling areas should be sited away from buildings to mitigate anticipated smell and vermin issues that have been identified as an issue in Burwash.

145. Are there any alternatives or additional points the Council should be considering?

146. What are your views on the requirements for private external space and do you feel they are appropriately flexible?

Yes.

147. What are your views on the Council's proposed policy on extensions to residential gardens?

What does 'modest in scale' mean? Needs more clarity.

148. Are there any alternatives or additional points the Council should be considering?

Arguments that it's modest needs to be scaled or percentage increase. Lack of clarity around wording, too subjective.

149. What are your views on the Council's proposed policy on extensions, alterations and outbuildings?

Same as previous local plan policy with little or no changes.

150. Are there any alternatives or additional points the Council should be considering?

151. What are your views on the Council's proposed policy on annexes?

Agree with the view.

152. Are there any alternatives or additional points the Council should be considering?

No.

153. What are your views on the Council's proposed policy on boundary treatments?

Good policy.

154. Are there any alternatives or additional points the Council should be considering?

No.

155. What are your views on the Council's proposed policy on access and drives?

Good policy. Some subjectivity on wording that could be clarified.

156. Are there any alternatives or additional points the Council should be considering?

Differentiation between agriculture track / access for definite need as opposed to random access tracks promoting dispelling of medieval field structures and harming of the Natural landscape.

157. What are your views on the Council's proposed policy on supporting new employment development?

Concern that this again allows development outside of the development boundary. Increasing the diversification of farms for employment needs careful consideration. Mention of holiday lets for unused farm buildings is contentious and doesn't support management and reduction in travel. Ancillary accommodation has not traditionally been supported. Policy worded for urban use but rural consideration is needed. What consultation has been undertaken with rural communities and farmers when developing this policy? Losing the farming industries within the AONB for allowing conversion of farm buildings with no limits. Dilution of the term 'employment' no incentive to keep agriculture.

158. Are there any alternatives or additional points the Council should be considering?

How the policy impacts the rural and farming communities in reality. Additional creep into development outside the development boundary, further weakening the premise of the boundaries.

159. What are your views on the Council's proposed policy on protecting existing employment sites and premises?

Sensible balance between protecting commercial sites and allowing sensitive development where commercially viability is clearly not possible. Proof of this will need to be clear and concise to ensure consistency in approach.

160. Are there any alternatives or additional points the Council should be considering?

Views of the community and knowledge of the parish council. Rural pubs have a different focus for employment and should perhaps be treated differently. Contaminated land is also an issue. No definition given of community uses.

161. What are your views on the Council's proposed policy on designated town centres?

N/a

162. Are there any alternatives or additional points the Council should be considering?

N/a

163. Are there any other areas of the district that the Council should be considering, and if so, what evidence is available?

N/a

164. What are your views on the Council's proposed policy on retail and leisure impact assessments?

N/a

165. Are there any alternatives or additional points the Council should be considering?

N/a

166. What are your views on the Council's proposed policy on tourism activities, facilities and accommodation.

Concern about point 3 as it allows justification of local produce for holiday accommodation, not clear enough. Open to abuse to build on farmland citing this policy. Policy is not supported by enforcement at all on holiday parks, caravan sites. Stronger language in policy to prevent permanent structures in rural sites.

167. Are there any alternatives or additional points the Council should be considering?

How it impacts farming communities with abuse of policy to build on farmland.

168. What are your views on the Council's proposed policy on holiday sites?

Subjective language weakens the policy, modest and suitable being open to interpretation when making decisions on sites put forward. This maybe because it covers too many variable uses of sites.

169. Are there any alternatives or additional points the Council should be considering?

Nothing to support biodiversity been removed from the previous policy.

170. What are your views on the Council's proposed policy on agriculture and forestry activities?

Good policy.

171. Are there any alternatives or additional points the Council should be considering?

Protection of verges and hedgerows and AONB sites. Impact on residents needs to be included. Definitions on secluded site and noise pollution. Forestry works needs to be looked at carefully, examples of sites being used for forestry equipment and work in secluded areas. New agricultural tracks are a concern, definition of track and not road. Secluded development needs to be defined. Impact of medieval field pattern in rural areas. Consideration of historic routeways in rural areas.

172. What are your views on the Council's proposed policy on diversification of agriculture?

Important policy to support diversification in a hard sector. Contained footprint of the farm is a good boundary to outline.

173. Are there any alternatives or additional points the Council should be considering?

Should be a limit on the diversification or the activities to diversify could become the main business.

174. What are your views on the Council's proposed policy on local employment and skills?

What are they paying for?

175. Are there any alternatives or additional points the Council should be considering?

None.

176. What are your views on the Council's proposed policy on equestrian developments?

Good, detailed policy. Enforcement key to this policy. Traffic management. Why does equestrian development have a separate policy, but the holiday lets encompasses so many leisure activities. Floodlighting needs to be demonstrated and kept to a minimum not assumed as a requirement, need to protect dark skies in rural areas.

- 177. Are there any alternatives or additional points the Council should be considering?**
No.
- 178. What are your views on the Council's proposed policy on rural environments and landscape character?**
Vague language about what features should be protected in the Natural Landscaps. Lack of focus on the Dudwell Valley in favour other areas. Lack of focus on important green spaces between rural villages.
- 179. Are there any alternatives or additional points the Council should be considering?**
As above.
- 180. What are your views on the Council's proposed policy on trees, woodlands and hedgerows?**
Can you remove hedgerows without planning permission? Importance of Saxon hedgerows across rural Rother and form importance boundaries across the Natural Landscape. Wording is vague and open for interpretation. Wording indicates that they can be replaced with no mention of wildlife displacement and wildlife corridors.
- 181. Are there any alternatives or additional points the Council should be considering?**
As above.
- 182. What are your views on the Council's proposed policy on Dark Skies?**
Very important to Burwash and surrounding parishes. Have a very active Wild About group in Burwash. Policy included in the Burwash Neighbourhood Plan. Wording indicates that dark skies only pertains to large expanses of glass and light pollution. Real dark skies support should include mention of the many species that rely on the dark skies of rural areas for their existence and reproduction, food sources and general habitat. No concessions can be made for eco builds, better protection for rural areas is needed using this policy. Real concern.
- 183. Are there any alternatives or additional points the Council should be considering?**
External and security lighting.
- 184. What are your views on the proposed policy on water, coastal and flood risk management?**
No comment.
- 185. Are there any alternatives or additional points the Council should be considering?**
No comment.
- 186. What are your views on the proposed policy on sustainable drainage?**
Drainage and water displacement is a real concern. Local knowledge of areas for development and infrastructure for delivering suitable drainage should be carefully considered. Enforcement must be deliverable here against developers that don't follow policy.
- 187. Are there any alternatives or additional points the Council should be considering?**
As above.
- 188. What are your views on the proposed policy on land stability?**
Where there is infilling of land, clear deliverable infrastructure management plan on where the soil comes from. If the levels are changes through infill, that change is correctly implemented and overseen and agreed.
- 189. Are there any alternatives or additional points the Council should be considering?**
As above.

- 190. Are there areas which you consider require an area specific policy, and if so, what evidence is available?**
As above.
- 191. What are your views on the Council's proposed policy on the Fairlight Cove Coastal Change Management Area?**
No comment.
- 192. Are there any further areas or additional points the Council should be considering?**
No comment.
- 193. Are there any other areas of the district that the Council should be considering, and if so, what evidence is available?**
No comment.
- 194. What are your views on the Council's proposed policy on sites protected for their habitats and species?**
Buffer needs to be determined at a decent level to stop creep. Increased protection for ancient woodland and keeping / observing habitats. Continued protection of indangered species.
- 195. Are there any alternatives or additional points the Council should be considering?**
As above.
- 196. Specifically, what are your views on the Council requiring an impact assessment for any development proposed within 25 metres of Ancient Woodland?**
This is a basic ask but should be very carefully considered and must have enforcement if not adhered to.
- 197. What are your views on the Council's proposed policy on the Sustainable Access and Recreation Management Strategy?**
No comment.
- 198. Are there any alternatives or additional points the Council should be considering?**
No comment.
- 199. What are your views on the Council's proposed policy on environmental pollution?**
Suitably qualified person paid for by the developer has had issues in the past with bias reporting. Good policy overall.
- 200. Are there any alternatives or additional points the Council should be considering?**
As above.
- 201. Are there any other forms of pollution that the Council should be considering for a specific sub-point, and if so, what evidence is available?**
As above.
- 202. What are your views on the Council's proposed policy on heritage management?**
Overall good policy. Need to ensure local feedback is considered.
- 203. Are there any alternatives or additional points the Council should be considering?**
As above.
- 204. What are your views on the Council's proposed policy on traditional historic farm buildings?**
Need a link between other relevant policies in the plan. Good policy overall.
- 205. Are there any alternatives or additional points the Council should be considering?**
As above re linking policies through the plan.
- 206. What are your views on the Council's proposed policy on shopfronts, signage and advertising?**

No comment.

207. Are there any alternatives or additional points the Council should be considering?

No comment.

ENDS

COMMENTS ON INFRASTRUCTURE DELIVERY PLAN RELEVANT TO BURWASH PARISH

- It appears that the only identified infrastructure outlined for Burwash is delivery of a cricket pitch.
- Identified need in the rural Rother area for increased clinical spaces relevant to the delivery of additional services to a wider community.
 - Burwash medical practice (Fairfield Surgery) has approx. 4,300 patients on role. The population of Burwash is approx. 2,300 people. The surgery services many more patients than just residents of Burwash parish. Surgery is oversubscribed and lacking space to grow.
 - The Parish Council are exploring the opportunity to build a new Community Hub to include new public toilets, community spaces, clinical spaces and additional parking.
- The water treatment plant in Shrub Lane has been poorly maintained and is at threat of failure with any increased development in Strand Meadow / Shrub Lane. This needs to be addressed.
- Burwash Primary School has just received an 'Outstanding' rating from Ofsted. This will no doubt mean that the reception class (PAN 25) will be full in the coming years as it's the only primary in the area to have this rating.
- Leased land at Hornbeam could be developed to include children's playground.
- Parish Council doesn't own or lease any other land in Burwash parish. Both Swan Meadow (Ham Lane) and the Pavilion & Playing Fields at Burwash Common are owned / managed by independent charities.

ENDS