

Bexhill Heritage Response to the Rother District Council Draft Local Plan 2024

1. Vision, overall priorities and objectives

1.1 We support the twin overall priorities 'Green to the Core' and 'Live Well Locally'. These are important and well-considered. However, we strongly recommend that 'Celebrating our Heritage and Building our Community' should be added as a third strategic priority. This third priority would relate to proposed policy HER1: Heritage Management.

We contend that encouraging a 'sense of place' is particularly important as the local population increases and communities evolve. Celebrating our heritage as a prerequisite for promoting community cohesion, building a sense of pride about living and working in the District, bringing people together, and encouraging citizens to contribute to their community's overall health and prosperity.

1.2 We support the key planning issues identified in paragraph 2.13 of the draft plan but recommend the following be added:

- realising the potential of the district's many 19th and early 20th century residential and non-residential buildings to provide affordable, good-quality, sustainable homes for local people while, at the same time, celebrating and enhancing the heritage value of such buildings.
- enhancing existing conservation areas and establishing new ones to protect and improve those parts of the District's built environment with significant historical and heritage value such as Bexhill's Town Centre and the 'De La Warr' Estate east of the town centre.
- encouraging the celebration and conservation of the District's heritage buildings by working with parish councils, heritage societies and other local organisations to compile local lists of non-designated heritage assets.
- encouraging and supporting individuals, groups, businesses and voluntary organisations to contribute to the enhancement of the District's natural and built environment in order to promote health, well-being and community cohesion.

1.3 We recommend that the fourth bullet point under 'key planning issues' be amended to include a clear statement of the importance of rail and road connectivity.

1.4 We recommend that the seventh bullet point be amended to replace 'strong, safe and sustainable communities' with 'strong, safe, cohesive and sustainable communities'.

2. Heritage Management (Section 12)

2.1. Bexhill Heritage broadly supports the section on heritage management, but we recommend a reordering of the paragraphs so as to reflect the importance of the role of 'the 'historic public realm' and 'historic buildings' in helping to define 'local character and sense of place' (para 12.11) and promoting sustainability

(para. 12.12). The paragraph that follows (12.13) consolidates this message by including a commitment to 'adapt, upgrade, repair and maintain' older buildings. Paragraph 12.13 also mentions the importance of the historic built environment for both a sense of place and cultural identity. This deserves greater emphasis.

We therefore recommend that paragraphs 12.11, 12.12 and 12.13 be moved to follow existing paragraph 12.1 to become new paragraphs 12.2, 12.3 and 12.4.

2.2. We are concerned about the claim in paragraph 12.2 that 'the historic built environment within the Rother District has a high level of statutory protection'. We do not agree as far as Bexhill is concerned. The Council's guidelines regarding the Bexhill Town Centre Conservation Area are widely ignored and rarely enforced. So much so that there have even been calls for its abandonment. Meanwhile, the architecturally and historically significant De La Warr Estate to the east is both unrecognized and largely unprotected. We're also disappointed that Bexhill currently has no 'local list' of non-designated heritage assets.

We therefore recommend that the following paragraph be inserted to follow the first sentence of paragraph 12.2.

"However, to be effective, the District's existing Conservation Areas require further promotion, support and enforcement. The process of review and evaluation remains underdeveloped. Some architecturally and historically significant parts of the District are currently unrecognised and unprotected. These would benefit from designation as Conservation Areas. There is currently no local list of non-designated heritage assets in Bexhill and in several other parts of the District. This further exposes some of our heritage assets to risk."

2.3. We strongly support the Council's policies on shopfronts, signage and advertising but urge that further consideration is given to policy promotion, support for business owners and enforcement. We also suggest that the policy is made compatible with the Council's policy on 'dark skies'.

3. Green to the Core (Section 3)

The comments below relate only to those elements of the draft plan that touch on heritage issues rather than to the proposals in general.

3.1 Proposed Policy GTC2: Net Zero Retrofit Standards

In view of the large number of older buildings in this area, it is good to see that in relation to statutorily and non-statutorily protected historic buildings, Policy HER1 will apply, guided by Historic England advice on climate change and historic building adaptation. While adapting to the Climate Emergency is a priority and it is imperative to improve the energy efficiency of existing buildings, this should not be at the expense of the character of local towns and villages.

3.2 Proposed Policy GTC3: Construction Materials and Waste

It is positive to note that this policy requires the reuse of land and buildings wherever feasible and consistent with maintaining and enhancing local character and distinctiveness.

However, we recommend the use of the word 'possible' in place of 'feasible' here to require greater efforts on the part of developers to reuse land and buildings.

3.3 Proposed Policy GTC6: Reusable and Low Carbon Energy

Again, it is positive to note that proposals for renewable and low energy generation will be supported where they "will not result in significant adverse impacts on landscape character...and local heritage".

4. Live well locally (Section 4)

Here we have addressed matters in the Council's draft plan that relate to heritage issues. For convenience, our comments are in the form of responses to a selection of questions from the draft.

Q27. There is a danger that 'compact development' heightens social misbehaviour and compromises resident's quality of life and well-being. Care is needed to ensure that residents enjoy quiet and private accommodation.

Q29. The Council should consider that better transport or movement links may allow for a lower density.

Q30. We strongly support the Council's policy on facilities and services.

Q31. We recommend that further thought is given to people's capacity to move goods and purchases. Light carrying is possible by bicycle but not so easy when on foot.

Q32. We strongly support the proposal that new development should be located within an 800m walk of local amenities.

Q34. We note that train travel is absent from the document and suggest the inclusion of the following paragraph and similar paragraphs for Battle, Robertsbridge and Rye.

With a direct train service to Gatwick Airport/London Victoria, and good connecting services for Charing Cross, Cannon Street and St. Pancras International (HS1), it is generally acknowledged that Bexhill is quite well served by rail, with four main-line railway stations (Bexhill, Normans Bay, Cooden Beach and Collington), Bexhill is overcoming the perception that it is "the end of the line" as a consequence of working closely with the organisations responsible for Bexhill's rail services. Stagecoach bus company provides the popular, frequent, 99 service linking Bexhill with Eastbourne, Hastings and beyond, as well as other services, including to Conquest Hospital. There is also a town Community Bus, and the Demand Responsive Transport (DRT).

As a matter of policy, the Council should underline its commitment to good public transport links both within and beyond the District.

We also strongly recommend that the following points be included in the Council's policy:

- evening bus services should be enhanced to facilitate journeys to and from evening meetings or events in Bexhill, including those provided by the De La Warr Pavilion
- cycling routes, to and from, and within Bexhill, should be reviewed and improved as a priority

- an additional rail station stop at Glyne Gap should be provided to serve the beach, swimming pool and Ravenside Retail and Leisure Park.

All the above have the potential to contribute to decarbonisation and to the Council's Climate Emergency strategy and policies.

The Local Plan should be bold in supporting and addressing these transport issues. Neighbouring West St. Leonards, in preparing its Neighbourhood Plan, is considering the inclusion of a proposed new West St. Leonards station, to straddle the Hastings and East Coastway railway lines, to improve its accessibility and connectivity.

Q35. While the 400m walking distance referred to in the draft policy is welcome, we are concerned about the lack of additional detail. For example, there is no specified availability and/or frequency of DRT or shuttle bus services. There is a danger that lack of detail at this stage might make the policy conditions possible to dilute or circumvent, unless more specifics are provided in a future policy document.

Q36. We support the policy on walking and cycling but note that footpaths and cycle paths are often badly neglected and difficult to use safely. Provision must be made for regular maintenance.

Q38. We strongly agree that demand-responsive local transport is important and will be increasingly important in the future.

Q39. We support the emphasis on heritage in the Council's proposed policy on distinctive places. We suggest that the Council should recommend the use of lime mortar as an alternative to cement. The former is carbon neutral and can be recycled at the end of a building's life.

Q40. Our additional points are as follows:

- involve the local community in the upkeep and protection of the environment and dispel the myth that it is the 'Council's job'.
- Involving the community should be central to the Council's ambition to build healthy lives and environments as this will promote a sense of both 'ownership' and responsibility.

Q42. We support the Council's proposed policy on built form but are concerned that, if it is not realistic, it may stifle the development and conversion of properties. Solar orientation is a very welcome requirement as it enhances sustainability and well-being.

Q50. We have some concerns about communal 'remote' car parking. Cars don't just carry people but food, goods and supplies for homes. Shopping is an activity that requires transport for the purchase of goods. Placing a car in a remote area away from acquisition centres will cause people to shop elsewhere or online.

5. Health and well-being (Section 6)

We have studied this important section of the draft plan with particular interest and care. Consequently, we wish to raise some important issues and ask some significant questions as follows:

5.1 HWB1: Supporting health and wellbeing

Section ii) *'Avoid or mitigate unacceptable harmful impacts and health risks from all forms of pollution.'*

This statement needs to be more forceful. We recommend the word *'unacceptable'* is removed from this statement. As mentioned within DEFRA's *'Wastewater treatment in England: data for 2020'* document, urban wastewater includes water from domestic and industrial premises and urban pollution from surface water run-off. Without treatment, urban wastewater has significant adverse impacts on our water environment. This is because it:

- contains nutrients which, when in excess, can speed up the growth of certain plants, disrupting natural processes and harming wildlife
- can be contaminated with harmful chemicals and bacteria which present risks to human health and the wider ecology of our water bodies

The same report confirms that approximately 0.06% of wastewater was reused. This means more than 99% of wastewater is discharged to inland waters, estuaries and the sea.

We urge the Council to press Southern Water to provide tertiary treatment processes for all wastewater discharges to help prevent eutrophication and/or removal of specific toxic substances. This should occur prior to the approval of planning applications for any new development. What will RDC do to enforce this?

5.2 HWB2: Health impact assessments

Under government guidelines *'Health Impact Assessment in spatial planning'*, there are 3 types of Health Impact Assessments (HIAs); *'comprehensive'*, *'rapid'* or *'desktop'*. Can RDC confirm which type of HIA is to be adopted for the development criteria mentioned in the policy?

Have officers carrying out these HIAs received sufficient training to do so?

Can RDC confirm if they have used the Public Health Skills and Knowledge Framework to review their training strategy and map areas of skills and knowledge relevant to HIA practice?

Can RDC confirm if they have in place a Continuous Professional Development (CPD) programme of training and learning opportunities for HIA completion and review?

5.3 HWB4: Community facilities and services

Improving existing community facility premises should be granted planning permission with *'like for like'* renovation works in line with current Building Regulations. For example, no uPVC window frames should be installed where metal/wood window frames were originally.

We are uncertain whether the ongoing maintenance of, or new build of facilities for local public toilets should fall under this category. However, the Council should make plans to ensure these services continue to be made available to the local population and do not fall into disrepair.

5.4 HWB5: Green and blue infrastructure

iv) Who in RDC is trained to establish if the GIM is sufficient to be submitted for planning approval?

iv) Can RDC confirm that the GIM will be reviewed by a number of people (minimum of two), independently with any disparity reconciled by them collectively?

5.5 HWB7: Combe Valley Countryside Park (CVCP)

Part of CVCP is privately owned. Can the Council agree that any future planning applications for residential new development within CVCP should be refused?

6. Infrastructure (Section 7)

6.1 We welcome the Council's policy statement that planning permission will only be granted if there is 'sufficient infrastructure capacity to meet the necessary requirements arising from the development'. However, there must be adequate provision for enforcement of this policy by the Council. Reliance on ageing infrastructure for the connection of water supplies to new developments, with the inevitable adverse consequences, as have already played out, is no longer acceptable.

7. Landscape Character (Section 10)

Q182. We support a policy that protects and promotes dark skies. Bexhill has a network of amateur and professional astronomers. Light pollution damages dark skies and detracts from the beauty of the night sky seen from dark locations. The Council for the Protection of Rural England ((CPRE) contends that, "Starry skies are one of the most magical sights the countryside can offer. Light pollution not only limits our views of those skies but also disrupts wildlife's natural patterns. We want to reclaim our dark skies." We agree.