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18th July 2024

Dear Sirs

Comments on the RDC Local Draft Plan for 2020 to 2040

Many thanks for providing me with the opportunity to comment on the draft RDC proposed local plan. I have spent many hours reading through trying to understand it and make constructive comments. Unfortunately I have had to stop at page 223 due to time constraints.

My main comments are that it is far too long, although missing potential development opportunities, far too open to prevent it being sustainable or green to the core, isn't up to date with the change of shopping and working habits, and does not provide me with a positive vision of the future.

The following comments refer to page numbers and sections within the plan and HELAA that might provide you with a better understanding of my concerns. Hopefully you will find them constructive.

Yours sincerely
Stephen Nicholls

Introduction.

Page 13 1.3

17% of RDC sits outside of the HWNL, which is the only area where housing development should be being considered.

Page 14 1.34

This does reduce the non-protected land to 10%, which, in my opinion is more than adequate for housing development consideration, without using designated land. This statistic (although I cannot see where this is clarified or determined in the plan by RDC) appears to be being used as an excuse to build on designated HWNL land.

The draft plan seems to be suggesting that we are going to need to build on more than 10% of all available land outside of the HWNL in Rother before 2040, but in my opinion RDC has not identified all available land and some of that land that has been identified as being unsuitable for housing or not available, could be. Please see below.

Many locations outside of the HWNL where development possibilities should be being considered in my own area appear to be missing, so the plan seems selective on where it has chosen to focus, on unacceptable, possible and approved sites. For example, not all land within our village has been considered, leaving some land totally unclassified.

In addition, 'eyesore' sites known to me within the district, such as MOU0012 (page 58 HELAA Pt2) appear to have been discounted because the landowner has stated the land is not available for industrial use. This is a good example of a so called 'greyfield' site (as recently defined by the new labour government) as it sits within the HWNL, a protected area, but the damage has already been done when builders concreted over the field to build the caravan sales shop, therefore the land can be considered to be of a lesser environmental quality. It has sat idle for 4 years now and needs to be used when there is a land shortage.

The HELAA states. *"While it could have potential for limited redevelopment for employment purposes, the landowner has indicated it is not available"*

Has the land owner been encouraged to apply for change of use for housing?

Section 7.8 on page 16 of the HELAA Pt1 states:-

*"The PPG15 states that where the HELAA finds that insufficient sites / broad locations have been identified to meet objectively assessed needs, including the identified local housing need, local planning authorities: "... will need to revisit their assessment, for example to carry out a further call for sites, **or changing assumptions about the development potential of particular sites to ensure these make the most efficient use of land.**"*

In light of this directive, what steps has RDC taken at this location to ensure efficient use of this land and what incentives or encouragement has the council offered the owner in order to free it up for housing?

BEX008 (a large site) on Page 35 of the HELAA Pt1 states *"The site is allocated for 2,000sqm of retail space, as well as offices, through Policy BEX14 of the DaSA Local Plan"*.

This is an example of how the plan also fails to acknowledge the changing nature of the areas requirements due to more people working from home since Covid 19 and the growth of internet shopping. We are not likely to see a resurgence of the high street retail areas that were once essential, or the need for more office space. Much of the retail space that does exist in Bexhill is occupied by charity shops. Again, not a sign of a need for more retail space. Previous plans and decisions need to

be revisited and assumptions need to change about the development potential of such sites in line with PPG15. Change of use for housing should be given encouragement at such locations. This would remove the pressure to build on new green field sites. Central locations such as BEX008, could provide the low-cost centralised accommodation for small families or the elderly within easy reach of the town centre. Also see my comments below concerning page 38 Q8.

Vision Page 19 By 2040

Currently, none of the aspirations you mention are met. In reality the plan as it stands, prioritising housing expansion, above infra structure placement and protection of our designated land will mean that people will become less, not more satisfied.

Sustainable Development

Page 8 in section 1 of the HELAA states *"In relation to economic land supply, paragraph 8 of the NPPF confirms that an economic objective is one of the three overarching objectives in achieving sustainable development, that is: to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure"*.

This is only one of the three statements concerning sustainable development at paragraph 8 of the NPPF, and whilst RDC is promoting a Housing and Economic Land Availability Assessment (HELLA) the fact that the other two equally important factors within the NPPF are also applicable, but have not been mentioned needs to be challenged to bring some balance, to what is clearly a heavily biased economic position by RDC.

Firstly the NPPF states:-

8. Achieving sustainable development means that the planning system has 3 overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

It then goes on to mention the other two overarching factors, namely:-

- ***a social objective*** – *to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
- ***an environmental objective*** – *to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*

The team that wrote the NPPF should be asked to explain how this sentence is sustainable :-

"by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure"

In a plan that sets no boundaries on how a community will grow in the future, the use of the word sustainable is misuse of the English language. It is not as if land is continually growing like the population. The UK coastline to the south, still sits the same distance from France as it did last year

and the year before. We are not making more land, except maybe at Dungeness, but I digress. There is only so much of it and the definition of the word sustainable is not being met.

In my opinion there is no such thing as continuous sustainable development with growth and the phrase should not be being used by RDC when it considers development at greenfield locations, which are finite and not replaceable once used up. The definition of sustainable on the internet is *“capable of being maintained at a steady level without exhausting natural resources or causing severe ecological damage”*

Since RDC is not setting a limit on the extent that it intends to use greenfield sites or limit development boundaries, by definition **THE RDC POLICY IS NOT SUSTAINABLE**. The ‘green to the core’ slogan being promoted is not possible with such unconstrained plans. ‘Green **at** the core’, might be a more apt slogan as it is a better indication of what this policy will mean. A gradual urbanisation of our countryside and green field spaces, leaving just a green core, which due to the way mathematics works, will itself eventually disappear under the developer’s digger without a plan to call a halt at some stage.

RDC will be aware that the new Labour government wants all existing brownfield sites to be developed, before the use of virgin greenfield sites and where they are implementing changes to the planning law regarding The Greenbelt, we are told that it is to develop ‘Greyfield’ sites first, where the land is of a poor quality. The greenfield sites identified within my own village of Catsfield are not low quality, by any definition of the word and could not be described as ‘Greyfield’.

In addition, Water and energy resources can be better managed with better policies. RDC could be encouraging people to eat in more, cook more at home, drive about less, save water, save electricity, walk to school, etc etc.

People take up resources and it is not possible to reduce below a base level. The population increase of recent years has only compounded the housing problem. When it reduces, we will not need such bold development schemes for housing as we will get back to a situation where we have a sustainable population and sustainable housing, without destroying our natural world. That’s my vision for the future of a sustainable environment.

Quality of Life Enhanced

Currently I don't consider my quality of life in RDC being enhanced on any level. There are too many people being crowded into a finite space with insufficient resources and services, and property speculators land banking and drip-feeding housing supply to keep prices high. Delivery of more housing, even if it did proceed on the scale that commentators demand, would likely cause a housing price collapse. Basic supply and demand economics. The problem is not enough rentable accommodation and too much emphasis on building low-cost housing for onward sale, which solves nothing, as the occupants simply want to make on their investment and can sell at market price 5 years after purchase.

Page 20 2.2

There is a worldwide climate emergency. Unfortunately, politicians refuse to acknowledge that the cause is a worldwide population emergency. RDC declaring a climate emergency is like the UK trying for net zero when we have countries like India and China belching out pollutants. In reality any development and an increased population will have a negative affect on the climate. It is impossible to reduce the climate emergency without reducing consumption of resources and housing and the people that will live in them are major users of resource. Central government must seriously consider

setting an ideal limit on the size of the UK population that we need and put incentives in place to achieve that objective. I look to RDC councillors representing me to at least identify population as a major influencer on people's quality of life, and start thinking beyond 2040, by feeding back local views to central government. We should not be kicking the can down the road for future generations to try and resolve by introducing unsustainable and environmentally damaging plans.

Page 21 2.5

Environmental assets are not enhanced by development, unless on a new for old basis, where for example the occupant of an old energy inefficient home has died and new residents upgrade that house to be more efficient, or a dirty factory is made to clean up its act. That is true sustainability. Adding to the housing stock to meet a population explosion, without ensuring that there are net gains on old housing stock first is a big mistake. I am dismayed that RDC has no plans for improving the old inefficient housing stock first?

Page 22 2.8

Developers will try and argue biodiversity net gain on all sites, by undertaking surveys of what they perceive to be the current biodiversity. We had this with the Normanhurst application. The big problem with this is that the submitted surveys are bought and paid for by the developers, so of course they are going to skew the results to demonstrate a net gain in favour of the application. Nature, left to itself will manage its own biodiversity, without the help of speculators that have little interest in biodiversity.

Page 23 Live well locally

RDC is failing on this due to insufficient infrastructure. Many people are far from well, having to wait ages to get to see a doctor or a dentist, hours at A&E wards, or have an operation. Whilst I acknowledge that these issues are largely the remit of central government to remedy, RDC should be pushing back against government directives to build build build, (as quoted by Boris Johnson) and set infrastructure in place as a first priority ahead of housing. We seem to be in an ever-spiralling downward trend due to lack of money in the poorly thought-out hope that population increase will be our big saviour. More people, who will ultimately become part of the problem when they get ill and older will only compound and accelerate the existing problems that we have and create even more problems for later generations. **THE RDC PLAN IS NOT SUSTAINABLE.**

Page 24 2.13

The priorities are totally wrong. The environment and the delivery of facilities for the existing residents should be the priority, not more housing, which will not remain low cost for long if built, see *"quality of life enhanced"* above.

Page 29 Q4

I am not impressed as the priorities are wrong and the low-cost saleable housing is wrong as far as I am concerned.

Page 29 Q5

Yes, please set a plan that analyses what the real priorities are. Set realistic objectives to achieve the revised priorities. Identify that the root cause of the issue is that there are simply too many people already in the area. Take steps to limit local population size by pushing back against central government policy to keep building.

Page 33 Operational Energy

Whatever is built in addition to what we have already will contribute to climate change, hence the need to only build what we really need and then only on brownfield sites where the environmental damage will be reduced. The current need is a self-inflicted wound caused by a population explosion.

Page 35 Whole life carbon

Why 10 or more houses? Surely the same criteria should apply to all new housing, otherwise developers will simply build 9 at a time to get around this requirement

Page 38 Q6

If we have to build then such standards are required.

Page 38 Q7

It is very important and I fully support the proposals at 3.17 and 3.18 to ensure that we get state of the art homes.

Page 38 Q8

Yes, more rental housing that will reduce the escalation of rents by private landlords, that then has a knock on affect to increase house prices beyond sustainable levels, that then leads to inflation. RDC should be building more affordable rented accommodation, but on brownfield sites, or at least outside of the HWNL.

Page 39 Q9 and Q10

I fully support this initiative, but it is not given the priority status it requires in the plan. The results from the roll out of such a policy should be setting the restriction for building more houses. For example, when it can be demonstrated that fuel efficiencies and other resources such as water saving through water capture schemes have been implemented and savings made, better sewerage handling to reduce pollution etc etc, then we can talk about building more homes. Not before. As I have said already, we need to put in place measures to fix the problems we have, reassess if those measures have worked and then take a decision on whether we can afford to risk creating even more problems than we have already!

Page 42 Q11 and Q12

I support the initiative, but for all house building, not just 10 or more. The explanatory text fails to suggest why the concept would only apply to 10 or more houses and why it ceases to be a good idea for less houses.

Page 44 Q13 and Q14

Because RDC has identified that we have a major water shortage the proposals should be strategic compulsory for all house building, not non-strategic. It is very easy to instal rainwater capture for toilet flushing and gardening and should be compulsory in ALL new builds. In addition, there should be incentives for people with existing properties looking to install such systems as part of an energy and consumption efficiency drive. Many people are still using their hosepipes to water their garden, when they could buy a 1000 ltr IBC and capture rainwater. On all new build, underground water storage tanks to capture rainwater should be mandatory.

Page 46 Q15 and Q16

There is a pattern emerging here, which is a total workaround for any developer not wanting to implement these good ideas. They should apply to all houses, not just 10 or more where an existing system is in place.

Page 49 Q17

I support it as a major priority ahead of building new housing.

Page 49 Q18

I have no issues with wind turbines, although some find them ugly. Due consideration to maintenance and noise must obviously be given high priority and they must not be located where they will cause a nuisance to residents. The nature of their operation deems that they be located on high ground and

this will mean they are readily visible, but personally I have no problem with them as part of a cleaner electricity generating future along with solar and nuclear power.

Page 52 Q20

I support the policy, but I am struggling to understand how building more and more houses in a Biodiversity crisis is going to have any noticeable positive impact. The existing HWNL has already been identified as an area where such habitats exist, therefore housing and other development should not be allowed in these areas. Left alone nature will look after itself. We don't need to help it, just leave it alone in the first place!

Page 55 Q22

I support the policy, but again for all development. If these ideas are good, then developers must not have the ability to bypass them by building less houses to get around the requirement.

Page 55 Q23

Yes. RDC should insist on more than 10%

Page 55 Q24

Yes. Developers should not be undertaking this as part of their submission through a consultant that is paid to come up with a favourable result. If it needs to be done then it should be undertaken by RDC and the developer charged for council time. This is a good way that the council can take on more specialised staff, provide a professional service that the public can trust and rely on, without them having to wade through hundreds and hundreds of biased and skewed client sided submissions similar to the Normanhurst debacle. RDC setting up a centre of excellence would also make money for the council, if it were run in a ring-fenced business-like fashion.

Page 58 3.55

The draft plan prioritises housing development over the provision of additional much needed services. This is wrong.

Page 61 Q25 and Q26

The HWNL is a precious asset for those that enjoy the countryside. It is fragile, but prime real estate for developers that see it as the best place to build to maximise their profits. They much prefer greenfield to grey or brownfield sites. Before any development within the HWNL is considered RDC should re-evaluate the figures for housing on the basis that we are likely to see a downturn in net migration in the coming years, which has been the driving force behind the population explosion and the massive expansion of housing within the South East. In line with the new Labour government guidelines, RDC should then develop all of the existing brown and grey field sites and those sites where permission has already been granted where land banking is taking place and penalise those developers that sit on land where PP has been granted through a local land taxation system for PP approved land sitting idle. At present developers can sit on an approved planning application while they drip feed the market to keep house prices high and concentrate on securing more green field countryside sites. RDC also needs to look more closely at the HELAA and reassess where change of use on brownfield sites to accommodate housing can be encouraged.

Page 68 Q27

Compact development is not what people that chose to live in the countryside want. They make a life choice to live away from the more compact areas where there are shops in towns. Development on the scale planned will result in our cherished villages becoming merged and more like towns than villages.

Page 68 Q28

I refer you to my response at 25-26

Page 68 Q29

Iv'e made them already.

Page 72 Q30

The priorities are totally wrong with housing being prioritised over facilities and the environment.

Page 72 Q31

Yes, please improve the facilities and infra structure first, doctors, dentists, schools, water, sewerage and access to public spaces.

Page72 Q32

This is not practical, desirable or applicable to small village communities

Page 75

Recent new housing development in our village has far too much external lighting. All these houses have an illuminated burglar alarm and outside light, in contrast to the other side of the street where it is dark. The dark skies policy for new development operated by RDC is **NOT** working and is transforming our villages into towns. Revised building regulations for houses built in small villages and the countryside are required to those required in towns.

Page 75

Existing Public Rights of Way are administered and managed by ESCC. How will this work in practice?

Page 78 Q34

RDC should be giving serious consideration right across the district, not just on new developments, to improving the access to the countryside and creating more walking routes for the elderly and disabled and those with pushchairs. Unfortunately, one of the biggest hurdles to this is the conventional wooden stile, the design of which is not in keeping with inclusivity protocols, is restrictive for people that are elderly, have children with them or are physically or mentally challenged. ESCC runs a gates for stiles scheme and as a keen walker I would personally like to see less stiles and more gates.

Page 83

I cannot accept that housing development, to whatever standard the council choses to set, will conserve and enhance the character of the HWNL.

Page 86 4.39

I disagree. Positive local character for me means that I can still currently take a walk in the countryside, without passing through a housing estate.

Page 86 4.42

I disagree. Not everyone wants their location "Brought to life" They like it peaceful and quiet, or they move to a town. They don't want a town forced on them!

Page 89 Landscape strategy

Refers to single houses and large developments. I am concerned that a lot of smaller planning applications will be excused these stricter regulations being proposed by RDC, when they should be subject to them. Surface water runoff is important, wherever it occurs, especially near open water courses where pollution can easily occur.

Page 90 Active frontages

The natural and often ancient hedgerows are key features of the HWNL, are an asset and must be retained at all costs for all sizes of development, so I disagree with the wording of this section as it does not consider this.

Page 93 Q44

All new developments, without exception of size, should be built with solar panels and rainwater retention systems.

Page 101 On street parking

Please DO NOT permit parking on pavements by making new roads wide enough. Parking on pavements encourages accidents and is a serious obstacle to disabled people and those with children.

Page 106 Q49

Hydrogen powered vehicles are the future, not conventional EV's. The plan should give consideration to the installation of hydrogen generation at a local level using solar power.

Page 111 Q53

Yes. The breaks need to be put on all new green field site allocation until we can see what the affect of a new government will bring with regards to projected population size and their plan to prioritise grey and brownfield development. In the meantime, the already allocated land should be built on, along with brown and grey field site redevelopment and change of use considered, but priority should be placed on infra structure and not new housing.

Page 115 5.11

The development boundaries of villages should **NOT** be enlarged until all suitable sites within those villages have been fully considered, otherwise the countryside will just become urbanisation of one village to the next. This sits with the RDC concept of living well locally, where the development takes place centrally to minimise impact on the environment and minimise the need to travel to local shops etc. In addition the term 'Windfall Sites' is extremely concerning to me and needs to be better defined and considered at the development plan stage. My understanding is that windfall sites will not be included towards the housing allocation when they should be. By excluding them I can see that a village such as Catsfield might have built it's allocation of housing and then a lot of supposed windfall sites crop up. Such sites, after the allocation has been fulfilled already, should not be allowed to proceed to a PA.

The term also implies a 'Get rich quick lottery win' scenario to a developer! The situation where a developer suddenly declares that they have a so called 'Windfall Site' within the countryside and especially the HWNL must not be allowed to happen unless this is redevelopment of an existing similar constructed permanent building. For example, a properly designed small extension to an existing building could be allowed to cater for the growing needs of local dwellers with growing families, not a new house where a stable exists. Not a new house where a delapidated barn exists. Not a new house where the landowner has made an untidy mess in the countryside by dumping old cars and vans and this is then used as a means of justification to have the land designated brown or grey field!

Page 115 5.12

Yes, and thank goodness we have such organisations as The CPRE as an active ally to protect the countryside. Your comments appear to be painting CPRE in a bad light, although I may have misinterpreted your meaning. If by compact and sustainable you mean that every hamlet needs a shop, a doctors, a church, a dentists or a Primark, then thank goodness for the CPRE.

Page 116 5.13

This should be seen as a positive aspect of the countryside and our remote areas. Bringing broadband, mobile phone coverage and all the trappings of a town are not everyone's priority. RDC could actively encourage land owners to free up land for additional walking where no footpaths exist. Street lighting in the countryside is to be strongly opposed due to the dark skies policy and the need to reduce urbanisation of the countryside.

Page 116 5.14

This is a national issue due to the pressure placed on the land by population growth, plus the drip feeding of housing availability by developers to maximise prices, hence my suggestion to tax land banking heavily. Very heavily. Councils are making the situation worse by permitting land banking. Unfortunately there is no such thing as affordable housing anywhere in the SE of England and in any case the policies behind AH are lacking, with buyers obtaining a discount at purchase, but able to sell on, maximise profits and pocket that discount after too short a time, as opposed to pass it to the next people after a few years with the discount still applied. The solution is either council or housing association built rentable accommodation for local people or a change to the AH sale rules.

Page 117 5.16

RDC should accept that some people quite like the peace and quiet of the countryside. It is not considered by those people to be social isolation. It is a life choice of many. Having said that, when people age, family members die and people wish to downsize and be nearer to others, rentable accommodation at the heart of small communities where access to better facilities is available could be one answer. I could be persuaded to favour the development of a small retirement estate at the heart of our village if it freed up housing elsewhere. There was a plan to do this in the village I believe 25 years ago.

Page 120 Q55

Yes. The council states that it wishes to be open in it's approach, but the whole concept behind this so called 'Windfall Site' allocation, plus the restrictions of the HELAA only applying to developments over a certain size, implies to me that we are going to have developments springing up all over the place, within the countryside at locations where the council has already identified as being unsuitable in it's HELAA. If a site is unsuitable for 5 or more houses, then it is more than likely unsuitable for a lesser number as well with the infra structure for reduced housing density causing the same damage and impact on the countryside. RDC needs to be much more transparent regarding these so called 'Windfall Sites' and where and if they will be permitted once the allocation for housing has been reached through the development of the proposed sites.

Page 146 Q62-Q64

I live in Catsfield, so I will focus on where I live. My first comment is that when looking at page 44 of the HELAA the HELLA appears to be considering, or has considered land outside of the current development boundary of Catsfield when it presents CAT0024. This site is not only outside of the current development boundary, but it sits within the HWNL and is crossed by a footpath CAT/2/1. Extension of the current boundary is not required as potential development land exists within the current development boundary outside of the HWNL. Land outside the current boundary to the west also runs into deregulated 60mph winding narrow lanes and is HWNL countryside. Extending the development boundary from its current position will be urbanisation of the countryside. The HELLA identifies the site labelled CAT0001 as an identified site. CAT0001 is a centralised location within the village on what can only be described as inaccessible land as no footpaths run through it, only alongside it up through Normanhurst. It has been designated for development for some time, but it does sit within the HWNL and I object to development of it for that reason, because I am concerned that it will set a local precedent for further development of the HWNL, when it is simply not necessary in Catsfield. CAT 0003 and CAT 0009 appear to be absent?

CAT 0029, another proposed site sits outside of the HWNL, is in the centre of the village within easy links to existing infra structure, but it is a greenfield site that I oppose for reasons already stated.

CAT0016, another potential site is again within the HWNL and being a walker and the local footpath warden for Ramblers, I always try to protect enjoyment of the countryside and designated land for the future enjoyment of all. Development at location CAT 0016 would involve a diversion of footpath CAT/4/1 . Footpath CAT/4/1 is part of the 1066 way, a promoted path as designated by ESCC and a heritage trail up through the Normanhurst Estate that over 1000 residents fought so hard to protect and won. To build houses here now would not only spoil the walk up through the estate, but reduce the protections afforded the rest of the Normanhurst estate by the council decision to refuse development on it.

With particular focus on Q64 my main concern lies with the fact that the HELAA has not considered all development, but sets a bar at 5 houses or above in it's assessment of suitability. This is too high a level and damage will be done at much lower levels of development. I have concerns that a more distributed approach utilising these already deemed unsuitable locations will be suggested for smaller scale development that sits below the HELAA level. This would be disastrous, as many of the sites are within the HWNL and the disruption caused and destruction of natural habitats, would, to my mind result in greater environmental impact and damage than development at a single larger site in the centre of the village that sits outside of the HWNL.

Page 178 Q77

No. I do not foresee a need for this level of housing growth on greenfield sites. What needs to happen is the land already passed for house building needs to be used first and all brownfield site opportunities and change of use opportunities fully considered and taken up if possible. Clearly the latter has not been achieved.

Page 180 Q78 and Q79

Some good points are made in this section, but in reality an impact assessment at a local level where any development is proposed must be undertaken first to ensure that those living in that area already, will not be impacted or put at a disadvantage by the development, or that those moving into a new development, will not suffer buyers remorse, through conflict due to differing concerns or interests. Countryside dwellers are also of a different ilk to say, town people. For example, not all those living in the countryside would make very good neighbours if those same people and their associated housing paraphernalia were relocated to a town centre! They light bonfires to burn waste, they keep horses and other pets that can be noisy and smelly, they use chainsaws, they shoot, they keep chickens, have BBQ, etc etc. When separation of humans exists on a suitable scale, these issues go un noticed as the actions have minimal impact on neighbours and the environment. However, In all cases, when you put more people into the same space the interaction between them has to become more courteous and considerate of others and I question if it is for RDC to be telling individuals how they need to be changing the way they live in order to accommodate more people moving in? The development experienced locally so far, has for me, been extremely negative and I see firsthand the impact of uncontrolled growth in the local population. I don't see that building more will improve on that. The countryside is an extremely fragile environment, where the presence of humans must be minimised in order to let nature thrive and those living in the countryside must not be made to live in towns or follow town restrictions on their way of life by gradual change from a country environment to a town one.

Page 187 Q82 and Q83

I am concerned by statements like *"Development boundaries form policy lines and they do not necessarily represent the exact edge of settlements as such"*. Whilst this might be true, they were set for a reason and the reason was to stop the encroachment into the countryside by developers looking to buy up agricultural land to make a quick profit.

The statement :- *"It is not possible to identify the settlements in which development boundaries may change"*
This is unacceptable to me and needs to be undertaken urgently. This plan runs to 454 pages, with supporting information doubling that page count. If you cannot define the extent to which you will control the ever-increasing encroachment into the countryside in such a large document, then I consider the document a failure of time and resource and perfect evidence that **THE RDC PLAN IS NOT SUSTAINABLE** and that the RDC Plan is **NOT GREEN TO THE CORE**.

Page 191 Q84 to Q86

I am not an expert in this field, but I have travelled considerably throughout Europe where I have seen successful integration of housing and light commercial operation, offices etc. We tend not to do that in this country, but with the growth of the internet and decline of the high street this seems to me to be an initiative that needs to be taken sooner, rather than later to avoid the towns turning into dust bowls with tumbleweed in the streets. Big emphasis needs to be placed on making provision for the elderly in towns where they can be near to shops and amenities. Better pedestrianisation measures should also be considered.

Where change of use relates to countryside land, such as changing, say a farm building into a housing estate, then the challenge to meet the green to the core commitments and to ensure we do not give up valuable food growing opportunities are other considerations. Change of use from virgin agricultural land to land available for building must be discouraged. It's not just a case of advertising for a buyer for 18 months, but I do believe that change of use can play it's part, certainly on sites that are developed already and I have suggested a couple above.

Page 192

I am concerned by the "Windfall Sites" strategy, as currently understood, that I would like to rename "The Stray Bullet Policy", because a stray bullet can hit anyone. It is not helpful to have a plan without defining how these so called "Windfall Sites" will be managed and regulated to ensure that every development opportunity for a speculator doesn't become a so called "Windfall Site", especially outside of existing development boundaries when RDC is currently unable to define development boundaries in the first place.

Page 199 6.2 Health and Wellbeing

One of the great assets that we have locally is our countryside. Being in it is a great aid to both physical and mental health.

Generally good access to it is possible for the young fit and healthy via the public footpaths network, which could be improved for the elderly and less able by making access easier, see my response to Q34 earlier. Unfortunately, some landowners take a negative approach to people walking the footpaths and actively take steps to hinder them by not cutting back vegetation, or letting stiles become dangerous and difficult to negotiate. They might argue that this is sometimes warranted, where for example walkers litter, or let their dogs off of a lead in a field where stock are present, or allow them to foul the footpath and do not clear up after them. As a member of Ramblers Society I am keen to see the footpath network opened up for ALL users and boundaries to walking removed. In the case of dogs, this could be improved by the issuing of a dog walkers license that could possibly help pay for the provision of dog waste disposal bins. We have one in our village that works very well, although we could do with more. I would like to see RDC working much closer with ESCC, who of course are responsible for the administration of PROW and local landowners to increase awareness of the benefits of walking and consult with landowners on how best this could be improved upon by removing as many hurdles to walking as possible and taking a stronger line with those land owners that put deliberate hurdles in the way of walkers.

Page 203 Q94

IHA's should be applicable to any development.

Page 216 6.4

First sentence wording needs to be revised from :- *"In addition to this, no PROW should be removed and a development should only seek to directly alter a PROW, if there is an overriding benefit in doing so."* Should read. *"In addition to this, no PROW should be removed and a development should only seek to directly alter a PROW, if there is an overriding benefit **to the PROW** in doing so."*

Page 217 Q104 and Q105

I am generally encouraged by the plans, but very concerned at the wording of 6.4 on page 216, which, rather than adding a protection, could reduce protection. The existing wording could be used by a developer to divert the PROW if it is in their "overriding benefit" to do so.

6.39 on page 216 does state *"The loss or harm to these networks through development must be avoided and access to the PROW network enhanced as part of a development proposal,"* therefore RDC also has to be very clear on the wording of section 6.4, in order to support the wording at 6.39, the intension of which must be to protect and enhance the existing footpath at that location, and not be used by developers as a valid reason to divert it.

Page 223

The plan states *"Planning permission will only be granted where it can be demonstrated, through the submission of appropriate evidence, that there is, or will be, sufficient infrastructure capacity to meet all the necessary requirements arising from the development. Where new infrastructure capacity is required, it must be demonstrated that it can be delivered upfront or early in the development phasing"*.

There is insufficient infra structure already, but RDC does not seem to be recognising this fact.

Stephen Nicholls
July 2024