

Response to RDC's Draft Local Plan from Brede Parish Council

General comment: A very knowledgeable, thorough and well-presented document. Sections on housing are more detailed than other sections.

Comments to specific questions are detailed below. All other questions are either supported or no comment to make

Section 2: Vision, Overall Priorities and Objectives

Question	Page	Comment
1	20	A well drafted and bold plan but a vision with without a means of delivery is a pipe-dream. Whether it is achievable across the whole district is questionable as the amount of investment required to achieve it is enormous. Currently basic infrastructure is failing, eg highways issues, drainage issues, provision of adequate services such as GP's and schools and much more.
2 and 3	25	The twin overall priorities of Green to the Core and Live well Locally are aspirational. They must include consideration of development in keeping with the existing visual landscape, particularly in the rural areas. A good list, written in rather woolly terms eg instead of writing "Providing better access" write "Providing a minimum of hourly transport links and broadband with a speed in excess of xxxxx". Again, without correct infrastructure, these are little more than aspirations. Generally it is a good strategic vision, but itl needs to be properly underpinned with policy, definitive in how it will be delivered.
4	29	Good, but needs tightening up with specifics, currently there are little or no definite actions, more a generalisation of achievement targets.
5	29	As answer to question 4

Section 3: Green to the Core

Question	Page	Comment
7	38	Very important to set high standards, with the intention of reaching them. With 90% of our area in the HWNL and National and International protected habitats and our potential to substantially contribute to National Carbon Sequestration targets, our standards should be higher than national ones to enable us to protect that position.
8	38	So far it seems very comprehensive, but no mention of where all the money to support it is coming from.
13	44	The policy appears lightweight in defined standards and targets to be achieved.
14	44	Lobby to have the water companies re-nationalised so all profits are reinvested
15	46	Very Lightweight policy
16	46	Suggest the options, develop and define them clearly.
17	49	Good policy.
18	49	The development of wind energy should be progressed further.
19	49	Consideration of wave energy reclamation and offshore wind farm investigation.
20	52	This is key to our contribution towards carbon sequestration and protecting our wetlands.
22	55	Very much in support of this
23	55	Achieve 10% first then consider going further. This area is in the unique position to deliver higher carbon sequestration given the nature of our landscape, (high density of woodlands and wetlands), we should set higher deliverables for our developments. We should also support and encourage 'cleaner businesses' to the area.

Section 4: Live Well Locally

Question	Page	Comment
28	68	Broadly agree, if the term 'village' includes hamlet. Why are all the Live Well Locally sites around Bexhill? What about the rest of Rother.
29	68	The comment 'Active Travel England's has an overall objective for half of all journeys in towns and cities to be cycles or walked by 2030' isn't really achievable unless the intention is to create cycle lanes along the very busy A roads in the district. Not many will choose to cycle along the A28 for example, given the state of the road, the volume and speed of traffic.
30-32	72	This is an important requirement and feeds into the carbon neutral and net zero agendas, but significant amounts of money will be needed for the rural areas to allow walking or riding to local amenities. This assumes that the infrastructure exists, eg a doctors surgery without a waiting list, a school not at capacity, appropriate local shops. More care needs to be taken to provide these facilities in new developments.
35	78	Generally support, although even 400m can be too far for some people.
38	82	Responsive travel is only worthwhile if it can take people close to their homes, which would be very expensive to run. Car Clubs and Car Shares to be encouraged but will arise from the private sector. 'Hand out' bus stops are useful in rural areas.
41	88	Support
44	93	Very important, Solar panels should be mandatory on new or redeveloped housing.
47	99	Support
48	106	Generally support, but unnecessary emphasis on bicycles. Most unlikely to catch on. Local transport likely to be a small electric car, therefore there is need for parking spaces and a charging point for every house. This is more relevant to urban areas than rural.
50	106	OK if close, secure and monitored by security cameras. More relevant for Urban development than rural communities.

Section 5: Development Strategy and Principles

Question	Page	Comment
72	165	Considering how much of Rother is countryside and how important this is to the area, this seems a very scantily considered section.
73	165	Include areas that are designated for woodland, nature reserves, wildlife corridors, viewpoints etc
74	170	Not supported. Travellers' sites should not be provided until there is clear evidence of need. Use the criteria-based policy (HOU11) to assess any proposals for windfall sites (either permanent or transit).
75	170	See above
77	177	Yes, put off development as long as possible. This is a beautiful rural area and should stay that way, with perhaps some development around the existing towns of Hastings and Bexhill
79	180	Infrastructure MUST be supported as per Section 5 -108
80-81	183	Support, to prevent piecemeal development of sites.
82-83	187	Good, this should strengthen the planning process.
89	194	10% seems appropriate
91	197	Encroachment into <u>all</u> gaps between settlement should only be undertaken in specific circumstance and examined with the greatest of care.

Section 6: Health and Wellbeing

Question	Page	Comment
92	200	Rather a vague section, needs specifics and identifiable targets.
95	203	Perhaps need something similar for other aspects e.g. education, transport.
97	206	Include arcades and other addictive children's activities, and nightclubs or other activities that will disturb a neighbourhood
103	214	Rather general, but probably yes.
104	217	Protecting the PROW's is important.

Section 7: Infrastructure

Question	Page	Comment
108	220	Absolutely, It is an integral part of the landscape of the district.
112-113	227	Digital connectivity is important now and will become more important in the years to come, as we rely on it more and more.
116	243	Affordable housing must be just that, affordable, and delivered as planned.
118	243	A balance of both is necessary, truly affordable housing will always be needed, but CIL should be the priority, without it we cannot improve the infrastructure.
119	246	Much better mixed with other types of development. Small bungalows are needed as well as houses.
120	246	Mixing with other types of development
121	248	Much better mixed with other types of development
122	248	As above
123	251	Affordable housing should follow the same criteria and procedures as all other types of housing development. Both section 8.50 and 8.51 are rather unclear. Does 8.50 say that a Rural Exception Sites in an AONB would need a written ministerial statement.
124	251	Community engagement levels must be more clearly defines, with the Parish Council able to determine whether the parish has been truly able to engage with a developer about its required needs, otherwise development may proceed on minimal engagement. Consider integrating affordable homes with other housing and using the same criteria for all
131	269	Edge of settlement is less likely to be attractive to older people.
135	278	Disagree. The Policy Statement says "Permission will be granted for Gypsy, Traveller and Travelling Showpeople when all of the following criteria are met as relevant:" The explanatory text says "In all cases, the location requirements of such sites will be similar to those for conventional housing sites." The Policy should therefore say that "Permission will be considered subject to normal planning requirements and the following additional criteria."
136	278	Clarify that normal planning criteria must be met.
139	285	20 or more seems appropriate for this area
140	291	Generally sensible, but the criterion for rural exceptions should be tightened from 'meaningful community engagement' to 'supported by a clear majority of the community'.
141	291	no
142	291	support
143	291	Support
146	297	Support and yes

Section 9 Economy

Question	Page	Comment
157	320	Wealth creation is the key to prosperity. This section needs a lot more thought and detail on what the council can do to encourage prosperity.
158	321	Subsidised premises for start-up businesses. Community Interest Company to support small business with training, marketing, IT etc. Parking and road Infrastructure are not mentioned. It may already be present in some areas, but where is the parking or park and ride considered.
161	329	Needs more work. Longer term projections for retail look excessive even considering the projected growth in population. We need small retail premises amongst the houses ('corner shops'), then a small number of larger centres with extensive public transport links. The larger shopping centres can also encompass some aspects of leisure, e.g. cinemas, gyms, swimming pools.
164	331	This hardly amounts to a strategy, just some comments about size.
165	331	Significant housing development should have land reserved for retail, leisure, schools etc.
166	335	Given the demonstrable importance of tourism to the area, this section needs much more thought and emphasis.
167	335	Maybe public transport connecting tourist venues and multi venue tickets. Park and ride for the main towns and Camber.
170	344	OK as far as it goes, but needs more development
171	344	States there is a need for a separate policy, but does not provide it.

Section 10: Landscape Character.

Question	Page	Comment
178	358	Hardly a policy; just a description of what's there
179	358	Everything about what's going to be done to protect and enhance these areas plus make them accessible and productive to the economy.
180	361	In general, yes, but lacks detail
181	361	An action plan for protection and enhancement

Section 11 Environmental Management

Question	Page	Comment
186	377	Sustainable drainage model used, be good to have clarity on which guidelines were used in obtaining the average rainfall calculation. What consideration has global warming been utilised. <ul style="list-style-type: none"> • Extreme wet weather and prolonged rainfall causing grounds to become saturated and non-absorbent. • Prolonged dry weather periods causing land to dry out, which can't soak away rainfall and water will just run off. • Highways surface drainage systems, increase in flows and run off- measures considered to understand volume and impact- are the drains connected to combined sewage networks or land treatment like soak aways, catchment ponds.
187	377	<ul style="list-style-type: none"> • Rother District Council has 3620 hectares of SSSI across the counties, drainage plans for these locations need additional measures exercised, it states 3 levels of treatment "What are these". The water utility company has sewage treatment sites across multiple locations which are governed by the regulator known as the EA (Environment Agency), what are the measures being put in place to monitor the impact from new developments.

		<ul style="list-style-type: none"> • Water Utility infrastructure, confirm on level of dialogue and understanding will be expected to the current in design of all its wastewater treatment sites. • Pollution caused by third party industries, development sites, farming and industry- all add additional pressures dependant on type of development requested. • Southern England has been identified as a water scarcity risk area of the country, what measures are being considered on the development and population growth. • Developers being accountable for the drainage and impact on the environment. How will this be managed and considered.
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Section 12: Heritage

Question	Page	Comment
201	405	No
204	416	Describes the situation well, but light on actions to be taken to protect historic farm buildings.

End of Comments for Local Plan

Comments for the HEELA Part 2 Chapter 4 Rye and the Eastern Settlements

BRE0035

"The HEELA states that this site has potential for five dwellings and that the residential curtilage should only be extended slightly northwards, as 'development of the entire site would not be acceptable, extending into the countryside out of character with the settlement pattern and impacting on an adjacent area of ancient woodland'.

Five houses in a slightly extended area would have a very similar density to the two recent applications dismissed on appeal as being 'inappropriate for an edge of village location'.

But if the density of five houses in a slightly enlarged area is considered satisfactory, then it should be shown accurately on the map, rather than show the complete area as having potential for development. The residential curtilage should be no further from the road than the existing houses in Whiteacres Close."