

Northiam Parish Council (NPC) Comments on RDC draft Local Plan. Regulation 18 consultation

The recent change of government and the emphasis that is to be placed on housebuilding under a revised NPPF is likely to have a significant effect on this revised plan. Depending on the degree of change a further consultation may be required.

Vision, Overall Priorities and Objectives

Q1. What are your views on the Council's Vision?

NPC is supportive of Council's vision.

Overall Priorities

Q2. What are your views on proposed twin Overall Priorities to be 'Green to the Core' and 'Live Well Locally'?

NPC is supportive of the Council's twin objectives which it believes are forward facing and focus on the best interests of its residents.

Para 2.13 key issues

Q3. What are your views on the key issues (listed at paragraph 2.13) that have been identified and is there anything significant missing?

NPC agrees with the priorities set out in para.2.13.

Objectives of Local Plan

Q4. What are your views on the Council's objectives for the Local Plan?

The objectives set out for the Local Plan are supported by Council but may need to alter given the proposed changes to the NPPF.

Additional objectives

Q5. Are there any alternatives or additional objectives and/or the ways to achieve the objectives the Council should be considering?

None, but the revised NPPF may have an effect with the central imposition of fixed housing targets.

Proposed Policy GTC1: Net Zero Building Standards

Q6. What are your views on the Council's proposed policy for net zero standards and which parts of the policy do you support?

Whilst a policy that requires higher Net Zero building standards than the national requirements is admirable, we are concerned that it could be considered an additional burden to development and is likely to fall at examination

Q7. How important is it for Rother to seek to set high standards?

See Q6 above.

Q8. Are there any alternatives or additional points the Council should be considering?

All new developments should be required to have roof-mounted photovoltaic cells and developments should be designed to maximise efficiency. NPC is also concerned that, in smaller developments, the necessary additional consultancy needed to meet the required planning application information may act as a deterrent to development, particularly in Rother where we wish to encourage smaller -10 homes sites to meet rural needs.

Proposed Policy GTC2: Net Zero Retrofit Standards

Q9. What are your views on the Council's proposed policy for net zero refurbishment standards?

NPC has a concern as to how these enhanced standards will be monitored and the additional work that is required to provide the necessary information at the planning application stage on what are likely to be mostly smaller developments.

Q10. Are there any alternatives or additional points the Council should be considering?

NPC believes that RDC should develop a Design Paper giving practical advice on steps that can be taken, particularly in listed buildings, to improve building efficiency.

If photovoltaic cells are to be allowed on listed buildings in certain situations, secondary glazing should be allowed subject to condition. It can after all be removed.

Proposed Policy GTC3: Construction Materials and Waste

Q11. What are your views on the Council's proposed policy for construction material and waste?

To conform with Govt. policy, overloading development with additional standards may be in opposition to the current 'presumption in favour of residential development'.

Q12. Are there any alternatives or additional points the Council should be considering?

None.

Proposed Policy GTC4: Water Efficiency

Q13. What are your views on the proposed policy for water efficiency?

NPC fully supports this policy.

Q14. Are there any alternatives or additional points the Council should be considering?

None

Proposed Policy GTC5: Heat Networks

Q15. What are your views on the Council's proposed policy for heat networks?

Where appropriate these should be supported.

Q16. What would be your preferred approach to carry forward in the Local Plan?

It should not just be a case of adding on to an existing heat network, but a policy requiring the establishment of such a system within a suitably sized development.

Proposed Policy GTC6: Renewable and Low Carbon Energy

Q17. What are your views on the Council's proposed policy for Renewable and Low Carbon Energy?

NPC fully supports this policy.

Q18. What are your views on identifying broad locations for wind development?

The statement in para 3.36 is in our view too restrictive. Sites for single turbines in the High Weald National Landscape should be considered. If acceptable at Glyndebourne, for instance, other sites may well be possible at a village level. Other technological improvements and techniques may well allow for smaller installations serving individual communities.

Q19. Are there any alternatives or additional points the Council should be considering?

RDC should commission a detailed location plan.

Proposed Policy GTC7: Local Nature Recovery Areas

Q20. What are your views on the Council's proposed policy for Local Nature Recovery Areas?

NPC fully supports this policy.

Proposed Policy GTC8: Biodiversity Net Gain

Q22. What are your views on the Council's proposed policy for Biodiversity Net Gain?

Support this policy.

Q23. What are your views on the Council going above the national minimum requirement of 10%?

The 10% Gov requirement should be retained. Any increase may result in development burden creep.

Proposed Policy GTC9: High Weald National Landscape (AONB)

Q25. What are your views on the Council's proposed policy for the High Weald National Landscape?

NPC fully supports this policy.

Q26. Are there any alternatives or additional points the Council should be considering?

Development where suitable should be allowed within the HWNL, small scale and to a high standard. It will be interesting to see if the new administration applies the concept of 'grey belt' to ANOBs.

Development Strategy and Principles

Q51. What are your views on the Council's preferred spatial development options?

This spatial development option will now need to be reconsidered in the light of the proposed NPPF statutory homes targets.

Q52. 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?

In the light of a revised NPPF, these options may need to be re-examined.

Proposed Strategy: Overall Spatial Development Strategy

Q54. What are your views on the Council’s proposed spatial development strategy and proposed minimum targets for housing and employment growth?

Overall the policy appears to be cogent and logical. With respect to Northiam the policy strategy states ‘clusters of villages based around the towns of Battle and Rye which act as key transport hubs’. We do feel that describing Rye as a ‘transport hub’ is stretching its usefulness. It would help if the buses coordinated with the trains! This is a strategy that will need to be amended in line with revised Govt. policy i.e. fixed housing numbers.

Vision for Rye and the Eastern Settlements Cluster

Q65. What are your views on the vision for Rye and the eastern network settlements?

NPC supports the thrust of the policy and in particular the designation of the proposed level of new housing and employment currently specified for Northiam.

Q66. What are your views on the distribution and opportunities for growth in settlements within the sub-area in figures 25, 26 & 27?

NPC accepts that scope for development is limited due to factors such as flooding, the HWNL (AONB) and access issues.

Q67. 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?

The only site set out in the DaSA is as below

DaSA allocation Policy NOR1	Land south of Northiam Church of England Primary School, Northiam	Northiam	6	0
--------------------------------	---	----------	---	---

and was also set out in the RDC DaSAP 2019. Given the protected trees on the site, the large pond, the slope and possible ownership issues, NPC questions whether 6 units is practical and achievable on this site.

NPC has considered the reasons for the rejection of other potential sites in Northiam and supports the conclusions reached.

Vision for the Countryside

Q72. What are your views on the vision for Rother’s countryside?

NPC supports this policy.

Proposed Policy HOU2: Affordable Housing

Q116. What are your views on the Council’s proposed policy on affordable housing?

NPC supports the approach taken by RDC.

Q117. Are there any alternatives or additional points the Council should be considering?

It is stated that the exact % of affordable housing to be provided within each development will be specified after this consultation and following a viability report. Such reports have scuppered many a scheme in Rother. RDC needs to consider the tricks that can be played by developers such as offering a small number of affordable units knowing full well that no social housing providers (SHP) will take them up and they will then revert to market housing as recently in Northiam. How about RDC purchasing them and entering into an arrangement with a SHP.?

Q118. Do you consider that prioritising affordable housing or the Community Infrastructure Levy is more important for Rother?

It is not a question of one or the other. All housing, affordable or not, requires suitable and appropriate infrastructure.

We await the new government policy on affordable housing and how it may be funded.

General Comments

NPC supports the Policies on Equine developments ECO10 and Rural Exemption sites HOUS5 carried over from the current Core Strategy 2014 and the DaSAP 2019 as well as policies DEV4 Retention of Sites of community and Economic value and DEV5 Small sites and windfall developments.

Other policies HOUS12-19 formerly included with the DaSAP 2019 are supported.

Northiam Parish Council
21 July 2024