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General Comment

Westfield Parish Council has worked with Councillors, the public and the Parish Clerk has engaged with other Clerks to produce this document. Responses have tried to be balanced, fair and considered when looking at the application of policies and the impact locally.

The Parish Council has tried to answer as many questions within the draft Local Plan as possible. However, there are some reoccurring themes and matters that should be highlighted at the start:

1. Lack of clarity on the details for Rother's statutory obligations within some of the policies themselves.
2. Lack of distinction between rural villages and urban areas and their needs around infrastructure, housing need at a local level and employment/economic opportunities outside of farming/agriculture and holiday lets.
3. Far too much duplication and cross referencing across the main policy headings. It is very difficult to look at single policies as they are referring to other policies which would have direct impacts on each other but sit in different policy areas.
4. Very concerning the lack of true protection of the High Weald National Landscape (HWNL). Increased opportunities to build outside development boundaries and how 'permeable' these boundaries now are with other policy priorities and 'infill' development.
5. Very unclear where the overall balance and weighting of the policies lie when stacked up against each other. The draft Local Plan makes many demands on developers, but it is very unclear which of these demands will be prioritised when there are issues around viability.
6. Concerns about the lack of CiL investment by Rother in rural areas especially those who have lost CiL funding through built and future 100% affordable housing sites. This needs to be addressed on a wider strategic level. Whilst Parish Councils can bid for CiL funds they lose out on funding if development has not been significant enough in their area. It is also an unrealistic onus to put this level of work on the Parish Clerks especially those in smaller parishes or those without Neighbourhood Plans to have evidenced need for the infrastructure for the whole Parish.
7. To make truly sustainable communities there needs to be a realistic view of where and how those communities currently exist and function and the services they need to achieve this. Many of the policies talk about well-being, tackling isolation, improving mental and physical health. Yet no discussion on the impact of lack of services in rural or remote locations to achieve this. The overall infrastructure plan does little to address this which should happen at a strategic level and not reliant to Parish and Town councils to identify this. There is also no discussion about the impact of lack of housing in areas for the people from those areas particularly those on the Housing Register.
8. The Parish Council is also concerned about the lack of enforcement. The effectiveness of any Local Plan will be irrelevant if Rother gains a reputation for minimal and weak enforcement. Much greater emphasis needs to be given on dealing with breach of planning and enforcement at the start rather than allowing them to build into much bigger issues.

It is also noted that the process for selecting the 'proposed sites' and the ongoing process for the strategic site allocation is not clear. This stands for parishes with or without or beginning neighbourhood plans so confirmation of this will be helpful.

Vision, Overall Priorities and Objectives

Q1. What are your views on the Council's Vision? And Q2 views on proposed twin Overall Priorities to be 'Green to the Core' and 'Live Well Locally'

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

1. It cannot be argued that the Council's vision is ambitious along with key priorities one and two. The concern is around the deliverability of the plan and the level of detail across the policies and lack of a 'system's thinking' approach and unintended consequences through the lack of joined up and clear strategies for the areas across Rother.
2. Another key concern about the vision, overall priorities and objectives is the lack of detail outlining Rother District Council's statutory responsibilities within the Plan to deliver the vision and objectives particularly around Biodiversity Net Gain, HWNL and very little detail in relation to surface water management and run off.
3. All the rural parishes are very aware of the percentage of the countryside that is it within the High Weald National Landscape (HWNL) and whilst this is referred to in the vision the reality is that many of the policies within the draught local plan do not match the statutory protections of the national landscape and ancient woodlands etc. Many of the rural parishes have already seen this thinking and impact as time and time again priority is given over to the housing need over the protection of the high weald national landscape despite there being a balance that should be met. That balance keeps on falling on the side of sustainable development instead of protecting the HWNL despite there being clear policies that could save and support this historic landscape.
4. For communities in the rural areas to be safe, balanced and age friendly this is highly dependent on where that development is being proposed. The current proposed sites in the supporting document HELAA do not create this vision for Westfield Parish. If policies allow development outside the development boundaries, for housing for older residents or 100% affordable housing over 800 metres away from services or merely having a lone bus stop for those individuals to be able to access those services this does not make for safe, balanced and age friendly communities.
5. Whilst some people do not enjoy development in their areas many more would prefer considered development in the right areas for those communities. However, what is referred to in relation to housing need is the overall need across the District with little detail on the specific local need. The HENDA whilst useful, is also lacking in local detail which is disappointing as the housing need in the rural areas is significantly different to that of the town councils and of course Bexhill. Local housing need for the District as a whole is regularly cited when reviewing the need for development in other areas.
6. What has been hugely positive, is when a local lettings plan is attached to new development in the Parish. If the right housing addressing the local housing need was being built and delivered in the rural and urban areas for the local communities, they would be far more successful. Yet throughout this local plan there is no recognition of that which is disappointing considering the positive impact it has had on Westfield for the affordable rent need and the reduction of the number of Westfield residents on the Housing Register.

7. By not linking the affordable housing in developments to Local Lettings Plans and not linking this with development policy, you cannot truly create mixed and balanced communities. If the right housing and housing tenure is not built in the area to match that local need you are:
 - separating people on the housing register from their communities and areas therefore removing them from their support networks and whilst this is a concern for all residents it is concerning for those with families along with younger and older residents who rely on those networks;
 - creating fractured and unbalance communities as the need for the area is not being met impacting on local people being able to access affordable and open market housing;
 - potentially housing vulnerable people in rural areas away from the services they need which will be Hastings or Bexhill based making access to services very difficult;
 - not considering the impact on all residents but especially in relation to younger and older residents having access the services they need weekly access such as NHS services, children centres or job centres when public transport is poor and limited in rural areas;
 - proposing affordable housing and housing for older residents that can be built outside development boundaries does not keep communities centralised and leads to a separated and fragmented community across the countryside leading to isolated pockets within our communities impacted.
8. The end paragraph alludes to working closely with Parish and Town councils, but the reality is Parish and Town councils have only had the top line engagement. The public meeting in Westfield was set up without any engagement with the Parish Council and the public meeting itself gave such top line information it wasn't very useful. It was also disappointing that the HELAA and individual sites were not discussed. The Parish and Town Councils that I have engaged with are not clear about the process or feedback on how sites were determined or what the stages for allocating sites will be and how this will impact areas with or starting Neighbourhood Plans. This is disappointing and whilst there was one initial meeting with the Rother Clerk Network to help Clerks manage this process further meetings were never followed up which is again a missed opportunity to properly prepare and engage the Parish Councils.
9. There are many opportunities to mention Parish Councils within the policies themselves or within the explanatory text, yet this doesn't happen at all. In particular in relation to 'local stewardship' and 'community assets'.
10. It is clear that the delivery of housing is and has always been a complex matter requiring policies that truly deliver sustainable communities taking a joined-up view across the social, environmental and social aspects of place shaping. This can only happen with clearly constructed and thought-out policies which set out statutory duties, linked to the needs of areas and being realistic about the delivery of those needs and the capacity within those areas. Whilst the vision in theory is a very well worded with ambitious objectives, the reality of the delivery and the consideration of the balance between the rural and the urban areas is minimal and consistently clear, balanced and detailed policies are lacking within the draft Local Plan. As previously stated, the policies within the plan do little to protect the High Weald National Landscape and offer many 'backdoor' options to develop in the HWNL.

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

11. delivering carbon reduction and adaptation to climate change, and responding to the locally declared 'Climate Emergency';
 - Needs clarity that there are two distinct areas this needs to happen in better building design AND proper masterplanning of housing to ensure the green spaces and the HWNL are truly protected.
12. meeting the overall local demand and need for housing (including affordable and specialist need) and associated growth – taking a landscape and sustainability led approach across the district;
 - This is not place specific enough. Very disappointing that Local Lettings Plan have not been a feature of this Local Plan. Building the right housing in the right place to allow people to stay within the communities and support networks is extremely important. This is especially for 100% affordable housing schemes. Over 50% of the housing need for affordable housing is within Bexhill yet little housing has been built to meet this demand especially affordable rent. Shared ownership options should be built to be genuinely affordable for local people to buy rather than build the large scale 3, 4 or 5 bedroom properties which many local residents cannot afford.
13. securing economic improvement in a challenging local and national economic cycle that requires ongoing flexibility;
 - Little credit is being given to rich agricultural land being lost in the HWNL which further weakens the economies in these rural communities. Reference in recent planning meetings that 'grade three' land is not worth keeping despite 97.5% of the HWNL being grade three or less. Very little focus on allowing the smaller industrial units to be given priority especially in rural areas and only appears in specific parishes with little or no reason.
14. providing better access to jobs, services and facilities across the district, and specifically supporting rural economies and communities, making them more sustainable, through meeting the needs of residents and visitors;
 - The needs of residents are extremely different. Very unclear what the link between these big areas are. This point seems to be trying to cover too many key economic items and should be clearer. Better breakdown of the needs of younger people needs to be featured within the draft Local Plan and that of an aging population.
15. conserving and enhancing the significant landscape and environmental quality across the district, particularly the High Weald National Landscape, Pevensey Levels and Dungeness Complex of Habitats Sites alongside delivering biodiversity gains and improvements to green infrastructure;
 - An important feature to protect the HWNL but many of the policies within this plan do not achieve this and development boundaries are far too permeable.
16. delivering district-wide and neighbourhood infrastructure to support growth, and strengthening the sustainability of settlements and communities;
 - There is no distinction again between rural and urban needs. Many rural areas, settlements and communities cannot be safely expanded with more housing unless truly significant infrastructure is put in place to make suitable sites accessible and sustainable.

- 17.** planning for physical and mental health and wellbeing by supporting strong, safe and sustainable communities, with a community-led focus, promoting healthier lifestyles, reducing inequality and deprivation;

 - Whilst this is very important it is unclear how this will be achieved especially if housing for the specific local areas is not being built. Local Lettings Plan would be a brilliant tool to keep people within their communities but is not mentioned within the draft Local Plan. A focus on 100% affordable housing does not create mixed and balanced communities nor does 100% open market housing. Much better infrastructure within the rural areas is needed to be able to have the capacity to promote healthier lifestyles, tackle isolation support for physical and mental health but much of this is reliant on the rural GP surgeries having the staff, funding and clinical space to deliver this. To date no consultation as we understand it, has been carried out with the rural GPs. Therefore, there is no evidence that any of this can be achieved in the rural areas nor any evidence in the infrastructure projects on how to build this capacity and need.

- 18.** planning for an ageing population, responding to the needs for adaptable homes and a range of accommodation needs;

 - Accommodation for older residents should feature far more on all housing developments. The idea of putting housing for older residents outside the development boundaries is not realistic or practical. Younger families and older residents should be at the heart of rural communities including the places they live in which are on truly sustainable sites with footpath links into the village centres.

- 19.** General points are many of the key issues listed do not seem to be supported by the policies within the Local Plan.

- 20.** If planning is always considered on a balance, protection of nature and the HWNL which houses much of that nature should be given much better protection and this mentioned in key policies such as this one.

Green to the Core

Proposed Policy GTC1: Net Zero Building Standards

Policy Status:	Strategic
New Policy?	Yes
Overall Priorities:	Green to the Core

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

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

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

21. This policy is ambitious, but several key questions arise:

- How will the implementation of these standards be monitored and enforced?
- How does this stack up against viability? Regularly we see 'outline planning' which promises a wide range of high standards but then viability reports strip these back.
- In relation to affordable housing how will this be protected and will the Council give priority over affordability vs net zero building standards. An example is the Blackfriars development in Battle which is even being funded by the District Council. Whilst this has had high eco features, the building cost of achieving this has wiped out any affordable housing on the site. It is worrying that if the District Council's own Housing Company cannot achieve this how does this set an example of other developers?
- Are Net Zero buildings being placed above the AONB in relation to importance? There is a concerning pattern throughout this plan to allow net zero development at high densities and numerous policies edging into the HWNL or clearly allowing development outside the development boundaries.
- Needs better clarity that these principles will be applied for affordable homes for those residents with the greatest need to ensure the cost of living in properties supports reducing bills for these residents.

Proposed Policy GTC2: Net Zero Retrofit Standards

Policy Status:	Strategic
New Policy?	Yes
Overall Priorities:	Green to the Core

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

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

22. Why has 'significant weight' has been given to only this policy. Adding in this wording changes the hierarchy of the policies. Does great weight override the weight of the HWNL? How about viability over affordable housing within mixed developments. Or any non-strategic policies as this is a strategic policy?

Proposed Policy GTC3: Construction Materials and Waste

Policy:	Strategic
New Policy?	Yes
Overall Priorities:	Green to the Core

Q11. What are your views on the Council's proposed policy for construction material and waste? Q12. Are there any alternatives or additional points the Council should be considering?

- 23. Whilst this is a welcomed approach what powers will officers have to implement this? If this is done via a planning condition is there the staffing to properly enforce this?
- 24. How does this relate to ESCC's waste policies? These aren't mentioned at all and raises the question who will be the key 'enforcer' and monitor the activities? Will this lie with Rother or East Sussex County Council.

Proposed Policy GTC4: Water Efficiency

Policy Status:	Non-strategic
New Policy?	No. Updated version of DaSA Policy DRM1
Overall Priorities:	Green to the Core

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

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

- 25. Any grey water or rainwater storage facilities are very welcomed considering the water constraints in the area.
- 26. Concerns again how much 'weighing in favour' will be given to these matters vs for example impact on the HWNL.
- 27. Policies needs linking across wider biodiversity matters and water issues.

Proposed Policy GTC5: Heat Networks

Policy:	Non-Strategic
New Policy?	Yes
Overall Priorities:	Green to the Core

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

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

- 28. Interesting to see how ambitious these heat networks are and where they have worked in Rother already.
- 29. Unsure why this is only in Bexhill?

Proposed Policy GTC6: Renewable and Low Carbon Energy

Policy Status:	Strategic
New Policy?	Yes
Overall Priorities:	Green to the Core

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

- 30. Language again is unclear and allows interpretation for harm to the HWNL with phrases such as 'significant adverse' and 'unacceptable visual impact'. No indication or what these two phrases mean and open to interpretation.

- 31. Whilst opportunities should always be made to ensure renewable and low energy generation can be achieved it is concerning that wording such as ‘successfully mitigated’ are use in relation to the HWNL. This questions what weight again is being given to preserve this historic landscape especially as many later policies are looking to allow development outside the development boundary and potentially in isolated settings within the HWNL.
- 32. Community led initiatives are a very positive focus as this could create innovative and community backed opportunities.
- 33. Solar – Stand-alone ground mounted installations are usually found in more rural areas for solar farms. There is lack of clarity in the policy wording on what ‘previously developed’ land would entail. Does this also mean any agricultural land? Also, for these sites this should be worded as ‘and’ not ‘or’ evidence of community support similar to the wording re wind. Again, this is very vague with no guidance on what this evidence would look like. Seems to be a missed opportunity to have solar on large flat commercial buildings.
- 34. Consideration needs to be given as well to where the materials for developing any of the solar, wind etc. energy mechanisms and these should come from sustainable resources. Otherwise, you are creating a situation where ecological harm in the world is happening elsewhere for ecological benefit in the UK.

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

- 35. Wind – It is unclear why wind turbines have been deemed ‘inappropriate’ within the HWNL. Whilst it is clear these do have a visual impact on the landscape, there could be isolated applications where this could be a very effective tool to reduce carbon emissions. An example of this is the single wind turbine at Glyndebourne which generated 1,820 megawatt hours in 2020 and produces 105% of the energy for the company and helped reduce their carbon emissions by 50%.

Proposed Policy GTC7: Local Nature Recovery Areas

Policy Status:	Strategic
New Policy?	Yes
Overall Priorities:	Green to the Core

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

Q21. Are there any alternatives or additional points the Council should be considering?

- 36. Again, who will monitor and uphold? Whilst the Environment Act places a duty on Local Authorities to ‘have regard’ to the Local Nature Recovery Strategy that Local Authority (Rother) should within their own policies make that commitment clear and robust by giving ‘the greatest weight’ behind the Sussex Nature Recovery (SNR). This is because when looking at the draft Local Plan as a whole this does not seem to be the case.
- 37. It feels this policy is very lacking which can also be attributed to the current situation and position of the Sussex Nature Recovery Plan.
- 38. There is a concern that great or significant weight has not been given to this policy, but other policies have such wording. In the SNR it states that England is one of the most nature

depleted countries in the world ranked 233 out of 240 countries. The SNR goes on to state in Sussex ‘a very small area is currently protected’ but there is also a diversity of habitats (although they cover a tiny area). Considering this the HWNL should be given the highest protection within the draft Local Plan to help maintain these limited and valuable spaces. Therefore, it is disappointing that no reference has been made of the HWNL nor the Pevensey Levels within this policy noting their importance in relation to the SNR.

39. It is also alarming that considering there is limited land that is protected within Sussex yet within this draft Local Plan there are numerous policies which are allowing development outside the development boundaries which will clearly put more pressure and damage on these small pockets of protected habitats for nature. Also, by making statements such as paragraph 8.120 which states:

“New dwellings may be essential in the countryside, including potentially in isolated locations, for the proper functioning of land-based businesses (i.e. farming, forestry and equine-related activities). Such businesses should be demonstrably ‘financially sound’, which normally means that permissions will initially be on a temporary basis. Permanent dwellings will normally require the agricultural unit and activity to have been established for at least three years... The siting of new dwellings should be well-related to existing farm buildings or other dwellings, wherever practicable. To ensure that a dwelling remains available to meet the recognised need, occupancy conditions will be applied.”

In practice this is another example of allowing development in ‘isolated’ areas. These isolated areas within the HWNL will usually have huge biodiversity rich habitats as noted in paragraph 11.47 of the SNR:

“Ancient Woodland, which covers 16% of the District (the highest percentage in the South-East) has complex and rare biodiversity because of their undisturbed soil, ground flora and fungi.”

Allowing a draft Local Plan which gives a permanent or temporary license to new dwellings within the countryside and then three years later approves them is a very dangerous precedent to set and seems completely counter to protecting the small, untouched, remaining diverse habitat there is within Sussex by allowing any development in isolated areas.

Proposed Policy GTC8: Biodiversity Net Gain

Policy Status:	Strategic
New Policy?	Yes
Overall Priorities:	Green to the Core

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

40. In the explanatory text it states:

“The presumption in favour of sustainable development does not apply where a plan or project is likely to have a significant effect on a habitats site, unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.”

Why is this wording not in the policy which give a very clear direction about the importance on protecting these small habitats within the District and HWNL.

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

41. 20% is unrealistic and be unviable for most developments putting affordability at the back of the priorities. This means many developments will always be starting on a negotiation. It seems far more realistic to set the BNG at the 10% but give great weight to developments aiming for 20% giving an incentive to achieve this. Also, much higher requirement to deliver 'off site' which should be a final step not a generally accepted position. Whilst there is the caveat that 'greater gains' can be delivered 'off-site' this leaves open the option of downgrading the overall biodiversity within one area for example the Parish of Westfield but then give far greater biodiversity in a neighbouring Parish. This as an option shouldn't be allowed especially within the HWNL and should be explicit within the policy.

Proposed Policy GTC9: High Weald National Landscape (AONB)

Policy Status:	Strategic
New Policy?	Yes, incorporating elements of DaSA Policies DEN1 – Maintaining Landscape Character and DEN2 – The High Weald AONB
Overall Priorities:	Green to the Core

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

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

42. Concerning that two policies have been merged into one therefore reducing the weight given to the HWNL. There also is little writing in the policy itself making the overall importance of the HWNL and this policy has not been given the wording 'great weight' giving the appearance that it is weaker and secondary to many of the other policies within the draft Local Plan.
43. Considering the level of HWNL in Rother and need to protect this historic landscape policy is short and nonspecific. This is further reflected by the high percentage of ancient woodland and untouched land. Lots of text in the explanation text but unless it is directly within the policy it is largely irrelevant. Both the HWNL and ancient woodland are irreplaceable and should be given the highest protections not policies which allows to mitigate harm.
44. When comparing the text between GCT9 and DEN1 no explanation has been given why the phrase "Particular care will be taken to maintain the sense of tranquillity of more remote areas." It is concerning the implications when this is coupled with the wording already seen in paragraphs 8.120, 8.121, considering the new policy ECO7 encouraging forestry in isolated areas and the lack of clarity on the definition of isolated. By removing this paragraph from the original DEN1 and read with this encouragement to consider 'isolated' homes in the countryside along with minimal definition of the term isolated this seems a 'back door' route into allowing more and more isolated development within the HWNL and disturbing the important tranquil spaces which are so important and lacking for nature and wildlife.
45. It is a concern that so much weight is given to the High Weald AONB Management Plan which a) changes every 5 years so policies of 20 years long are reliant on a document that changes within that timeframe and b) the new High Weald AONB Management Plan, it is understood, has been criticised by local nature groups for being weaker than the former guidance. Further versions could continue to weaken the protection of the HWNL.

46. No clear definition of 'major development' or 'small-scale' every given and open to too much interpretation. This should be defined for development in the HWNL
47. Compared to other Local Plans with 'National Landscapes' this policy seems weak and lacking in clarity. Unclear why the 'countryside' is put in commas as the land is either countryside or not. Again, creating such ambiguity is concerning when have clearly defined and distinct policies protecting the countryside and HWNL.
48. The policy directly contradicts with many of the polices with the draft Local Plan. In paragraph 3.50 it states:

“The statutory purpose of the landscape designation is to conserve and enhance the natural beauty of the area, and AONBs have the highest status of protection nationally...”

Yet in paragraph 3.54 it then states:

“Suburbanisation of landscape character, including through conversion of farmstead buildings, new roads, highways networks and inappropriate edge of settlement development, is eroding the distinctive local style in many places.”

Yet it can be easily urged that many of the policies which, allow more development in the HWNL including but not limited to:

- The removal of Core Strategy 2014 policy RA2 'General Strategy for the Countryside'.
- The allowance of more development in isolated areas as with policy ECO7.
- RA3 being replace with HOU13 which has added in additional 'new dwellings within the countryside' including:
 - v) specialist housing for older people
 - vi) Single or pairs of dwellings... where the site is either a small gap in an otherwise built-up frontage or is adjacent to the edge of an otherwise built-up frontage – This is encouraging ribbon development and suburbanising the HWNL by removing these important 'green gaps'
- Paragraph 8.128
- Policy HOU9 which allows development outside the development boundary for older residents.
- Policy DEV3: Development Boundaries in which the explanatory text states the following will be considered outside of the development boundary:
 - While land outside development boundaries is regarded as 'countryside' for planning policy purposes, it does include some villages, hamlets and farmsteads. A countryside location does not prevent appropriate development. The potential for development outside development boundaries to support vital rural communities and also conserve or enhance its intrinsic qualities is recognised. There are specific policies to promote a sustainable rural economy, including farming, tourism and to meet recognised local needs for facilities or affordable housing both in other policies of the draft Local Plan.
- Policy LWL1: Compact development which includes countryside areas and outside the development boundaries. The policy states “Densities more than the maximum will be encouraged within these zones where the development is the result of robust high-quality design-led approach...and/or the proposals are in accordance with a neighbourhood plan, design code or other adopted policy guidance.”
- Policy LWL2 and LWL3 – distances from services seems very concerning as no upper limit has been given for going over the 800m requirement in 'Village and Countryside Area Types' with ambiguous wording such as 'an acceptable safe, useable walking or cycling distance.' in LWL3 it does state that 'major development' which within the

AONBs 'should be refused' according to the NPPF. However, Rother do not give a definition of 'major development' and footnote 64 in the NPPF allows the decision maker to decide. We have had instances within Burwash where a 30 house was deemed 'not major' by the planning officer. In Westfield 20 houses outside the development boundary and a 64-bed care home equally deemed 'not major' development. This conflicts with a nearby development in Borad Oak for 20 houses which was deemed to be major development. There seems to be an inconsistency how 'major development' is interpreted.

- Policy ECO1 – Whilst some development outside the DEVELOPMENT BOUNDARY for small-scale growth of existing businesses the breadth of this outlined in EC08 and EC07 seriously raise the concern of the digging away at previously tranquil areas within the HWNL. Examples of this would include Hop and Hare Farm and the removal of “Particular care will be taken to maintain the sense of tranquillity of more remote areas.”
- Policy ECO7 seems to directly go against protecting the landscape and character of the HWNL by allow agriculture and forestry works to be carried out in isolated areas and also allowing tracks to be built out to these sites. Such an intrusion into the HWNL will create significant visual impacts and impacts on the biodiversity and wildlife in these areas. Concern about the automatic presumption for increased public access.

Live Well Locally

Proposed Policy LWL1: Compact Development

Policy Status:	Strategic
New Policy?	Yes
Overall Priorities:	Live Well Locally

Q27. What are your views on the Council's proposed policy on compact development?

49. Concerns over no 'upper limit' defined in references to encouraging more than the maximum density in the policy.
50. Unclear the meaning of allowing for the encouragement of higher densities in line with 'other adopted policy guidance'. What guidance and what policies? Does this not leave rural areas open to development in or out of the development boundary at higher densities if the proposals are 'high-quality design-led approach'. Again, no clear guidance within the policy and largely left to interpretation which raises concerns especially for development outside the development boundaries.
51. No established Demand Responsive Transport only pilot scheme of a Flexibus which is currently confused and unclear for many rural areas. This scheme has no guaranteed funding for the next 20 years from ESCC and largely excludes many parts of the rural communities.
52. What counts as good access to shops? One shop? Two? In policy LWL2 it states that this can be over 800m in villages and 'countryside areas types' so how far from shops does this mean. There is also no requirement for connection via footpaths just 'acceptable, safe, useable walking OR cycling distance'. For older residents this seems to go directly against making 'age-friendly communities'.
53. No discussion is given on how increasing densities effect outdoor spaces. What about tree planting etc or is the high just for just matchbox lawns? There's no clarification on how other policies will be affected in relation to increasing the maximum densities. For example, will the harm to the HWNL be deemed acceptable in more isolated spaces if the site is well designed? What about hedges for wildlife and trees for reducing temperatures in the area and options to grown own veg in gardens rather than the tiny 10 metre requirement as outlined in paragraph 8.131 of the draft Local Plan. Whilst HWB1 vi) states developments only must demonstrate to "provide space for food both within in community gardens, allotments and/or private gardens to ensure food security.' However, no great weight is given to this vs the working in the LWL1 policy which states densities 'more than the maximum will be encouraged'. How does compact development account for this. Again, too much reliance on jumping between so many various policies rather than having clear guidance and clarity in each policy.
54. During covid this showed the absolute need for outdoor space rather than people living top on each other outside urban sites and in urban developments.

Q28. What are your views on the area types and densities proposed as a key driver to Live Well Locally?

- 55. The densities should be set for the various areas. It is very unclear why having set these densities the draft Local Plan would then 'encourage' developers to go over these densities. Open to abuse and interpretation and should be removed for all areas noted within the plan.
- 56. Further concerning as the studies across the District especially Bexhill, Battle and Rye hasn't been carried out making this policy even more open to interpretation as no clear clarity on what areas are being identified in points a-e.

Proposed Policy LWL2: Facilities & Services

Policy Status:	Strategic
New Policy?	Yes
Overall Priorities:	Live Well Locally

Q30. What are your views on the Council's proposed policy on facilities and services?

Q31. Are there any alternatives or additional points the Council should be considering?

- 57. What is a 'safe, useable walking route'? Why is the term footpath not mentioned. What determines what is safe and for who? Public footpaths in rural areas good for those able to walk unaided but those requiring additional support or pushchairs etc they are not suitable.
- 58. People maybe in an area with a 'bus service' but the reality of this service within rural and urban areas is very variable, unreliable and only once every hour or two hours.
- 59. No detail is given in how these 'mobility hubs' as discuss in paragraph 4.18 will be run and funded. Westfield does not have a useable 'indoor meeting space' for such services providing information so how does that define Westfield as an area?
- 60. In paragraph 4.19 it states 'We recognise that rural communities have different needs', yet this is not outlined in the policy itself and how does the proposed use of cars then link back into this policy for the rural areas within the HWNL.
- 61. Consideration about what services are actually missing in rural areas and how rural areas can access these. For example, job centre, children services, CAB etc.

Q32. 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?

- 62. 800m is only 200m shy of a kilometre. For many older residents this is completely unrealistic. The '20-minute neighbourhood concept' does not seem to take into account those who are unable to walk solidly for 20 minutes nor the fact that shopping etc would have to be transported home on foot.
- 63. What is over 800m in village and rural areas? What is the maximum? No upper limit given and left far too open for interpretation.

64. Para – 4.19 ‘more rural parts of Rother’ Does this mean that development in the rural areas doesn’t need to be accessible by foot and developments reliant on car use will be more acceptable? What constitutes as a ‘more rural part’ of Rother? No definition given and how this relates to live well locally areas, village areas or countryside areas.

Proposed Policy LWL3: Walking, Wheeling, Cycling and Public Transport (Outside the Site)

Policy Status:	Strategic
New Policy?	Yes
Overall Priorities:	Live Well Locally

Q33. What are your views on the Council’s proposed policy on walking, wheeling, cycling and public transport (outside the site)?

Q34. Are there any alternatives or additional points the Council should be considering?

65. No established Demand Responsive Transport only pilot scheme of a Flexibus which is currently confused and unclear for many rural areas.
66. Seems an unrealistic for all development to have this as a consideration/financial contribution.
67. Facilities at bus stops ‘for all users’ many bus stops are not compatible with wheelchair users. Nor are they in areas where any realistic improvements can be made. RDC keep on making these ‘planning conditions’ when they are simply not deliverable along with Highways citing sites are sustainable with ‘upgrades to bus stops’ without anyway being able to make these physical improvements due to restrictions of the site(s). RDC needs to be more realistic about what can and cannot be delivered on road infrastructure.
68. What is a ‘high quality’ walking and wheeling route. Is this not a footpath? Why are footpaths not specifically mentioned?
69. What happens to sites that do not have 2m wide footpaths? Is the site then deemed unviable as this seems contrary to the ‘proposed sites’ identified in Westfield Parish.
70. No mention in this policy about requirement to ‘join up’ these high-quality walking and wheeling routes. Why is the term footpath not mentioned? Concerns development will be placed in unsustainable sites with ‘shared road surfaces’ which is concerning for any member of the public with children or may have additional needs which makes them far more vulnerable when using such ‘shared surfaces’.

Q35. Specifically, what are your views on the requirements set regarding public transport, such as the 400m walking distance proximity requirement?

71. Thoroughly unclear on identifying what ‘effective’, ‘convenient’ or ‘regular’ public transport actually is. Within the HWNL and rural areas there is a danger this policy is looking to allow more development within the ‘countryside’. If you are walking 400m to a single bus stop which only has one bus every one or two hours but takes you to a couple of local shops this does not seem at all suitable for ‘safe, balance, age-friendly communities’.

Proposed Policy LWL4: Walking, Wheeling, Cycling & Public Transport (Within the Site)

Policy Status:	Strategic
New Policy?	Yes
Overall Priorities:	Live Well Locally

Q36. What are your views on the Council's proposed policy on walking, wheeling, cycling and public transport (within the site)?

Q37. Are there any alternatives or additional points the Council should be considering?

- 72. Whilst ambitious and in principle should be welcomed how realistic is the viability of delivering such outcomes from one dwelling upwards?
- 73. There is no distinction between rural and urban.
- 74. No established Demand Responsive Transport only pilot scheme of a Flexibus which is currently confused and unclear for many rural areas.
- 75. Unsure how such demands are realistic for developments of one or more. It would seem more sensible for a sliding scale of requirements as houses increased. The current policy seems more align within a major urban city settlement rather than a rural District Council.

Q38. Specifically, what are your views on the provision of Demand Responsive Transport, car clubs and car shares?

- 76. Demand Responsive Transport is a truly transformative idea. However, due to the limitations of existing bus routes and so many rules etc. it puts people off using or many particularly in Westfield cannot access it. If it is to become a serious transport option a significant review of how this is delivered is needed and better working with the community provided services such as BACT.
- 77. Car clubs and car shares are lovely ideas and been around as a concept for a number of years. However, limited take up and not something culturally embedded. No details of how this would be achieved or incentives for people to use.

Proposed Policy LWL5: Distinctive Places

Policy Status:	Strategic
New Policy?	Yes
Overall Priorities:	Live Well Locally

Q39. What are your views on the Council's proposed policy on distinctive places?

Q40. Are there any alternatives or additional points the Council should be considering?

- 78. This policy seems an amalgamation of a number of key policies from the 2014 Plan. Unclear why these policies have been 'lumped' together and why this has happened and concern about limited weight under one expansive policy rather than individual policies. Policy seems to be

trying to cover too much. It is a shame that the 2014 Core Strategy policies for the countryside have been removed RA1, RA2 and RA3 and not replaced but now urban/countryside in one policy. It seems to be a policy based around the 'Sustainable Communities' concept but with less clarity and focus.

- 79. The 'distinctive place' of an urban vs rural in the HWNL are significantly different but all under the same policy with limited wording and clarity.
- 80. Concern on the over reliance of the High Weald AONB Management Plan which changes every five years and is not under the same level of scrutiny as the Local Plan.
- 81. iv) Material Banks – How will this realistically be monitored?
- 82. Unsure why Parish Councils are not mentioned at all under 'Stewardship'. Seems an odd thing to miss out when the whole of Rother District is now Parished. Why not recognise the Parish and Town Councils as a key resource to work with on Stewardship?

Proposed Policy LWL6: Built Form

Policy Status:	Strategic
New Policy?	Yes
Overall Priorities:	Live Well Locally

Q42. What are your views on the Council's proposed policy on built form?

Q43. Are there any alternatives or additional points the Council should be considering?

- 83. Orientation – gardens need to be mentioned – issues clay base, damp gardens creation of mould if largely in shade.
 - 84. As a new policy it seems to plug a significant gap from the 2014 Core Strategy and greatly welcomed.
 - 85. It is disappointing that too little detail given in the policy compared to some of the GTC policies and relies on the explanatory text for clear definitions. This seems a mistake as a lot of the text give the specifics which are lacking in the main policy and leave too open to interpretation.
 - 86. vi), vii) and viii) all incredibly important for rural areas and villages. The Edges section is particularly welcomed recognising the importance to address the countryside in the design of these properties. Active Frontages are also very important in creating a rural design rather than having large expanses of blank walls and long stretches of fencing. Very clear.
 - 87. Why must windows be clear along the ground floor of non-residential buildings (avoid obscure windows) – Why? Such actions can help with security of these buildings and no explanation given on why this has been included.
 - 88. Why is the breakdown of dwellings in paragraph 4.55 over 10 not included in the main policy? Missed opportunity and would be welcomed to have that level of clarity in the policy itself.
- Q44. Specifically, what are your views on prioritising solar orientation and form factor when designing new developments?
- 89. Solar panels are clearly a useful renewable energy resource. Whilst a welcomed and needed requirement this does need to be balanced on the overall impact of the character in the area of the HWNL particularly if visible.

Proposed Policy LWL7: Streets for All

Policy Status:	Strategic
New Policy?	Yes
Overall Priorities:	Live Well Locally

Q45. What are your views on the Council's proposed policy on streets for all?

Q46. Are there any alternatives or additional points the Council should be considering?

90. 20mph are not national policy, currently not enforced by the police and not supported by ESCC. How is this policy going to work to get the police to enforce. Otherwise 20mph zones should be prioritised within developments. Very positive to recognise the importance of road design to restrict vehicle speeds within areas of residential buildings.
91. Tree lined streets are positive impact but if in the public realm who will have stewardship of these trees? Are Parish Councils not ideally placed to look after the trees as long as financial support is given especially for smaller Councils.
92. Shared streets is a very welcomed concept. Great weight needs to be given to the introduction of benches etc but also good local engagement in relation to the materials and design used. Issue again of long-term stewardship of such items in public open spaces.
93. It would have been good to have seen some recommendation for engagement with the Parish Council for long term stewardship for many of the items suggested in this policy and too often items are brought into communities and not properly looked after.
94. How are all of these elements going to be viable for 'all developments'. Again, no sliding scale for the size of development and seems a large ask for smaller developments. Also, no clear 'hierarchy' for all these various features. Concerns viability will essentially remove many of these items.
95. Landscaping in relation to 'frontage parking' needs to be more considered. Permitted Development is allowed for a new or replacement driveway on any size if it is built with porous surfacing. Therefore, 'green relief' areas need to be outside the title deed of properties to ensure they are not just turned into driveways.

Proposed Policy LWL8: Multimodal Parking

Policy Status:	Strategic
New Policy?	Yes
Overall Priorities:	Live Well Locally

Q48. What are your views on the Council's proposed policy on multimodal parking?

Q49. Are there any alternatives or additional points the Council should be considering?

96. All proposals re cycle parking are well detailed but particularly in rural areas cycling is not as safe. Such policies should be widely encouraged in urban environments but many of the rural roads are narrow and at the national speed limit so not conducive with safe cycling.
97. Proposals for car parking layouts are very welcomed.

- 98.** On Street parking needs to also consider the necessity of high kerbs to minimise on pavement parking.
- 99.** In curtilage parking faces the same issues outlined in point 88. Due to the allowances re permitted development more effort needs to go into the design of properties/developments to not give access to or given the space to allow front gardens to be covered over for the use of driveways. Encourage designs which only allow for car parking at the side or even back of the property.
- 100.** Disagree with the analysis of rear parking. If the alternative is allowing wider frontages which can easily all be turned into a driveway, then more allowances should be made for rear parking as permitted development rights are only for the front garden. Consideration maybe more for the rural areas. Also keeps cars out of sight.

Q50. Specifically, what are your views on communal 'remote' car parking?

- 101.** Community remote parking sounds dangerous and unsafe especially for female users. The idea of a 'car barn' or 'car port' which only has 'natural surveillance' poses serious safety issues in relation to personal safety. On a personal note, I cannot and would not recommend any lone woman using such a facility. The concept in paragraph 4.75 that car ownership is going to drop in the next 16 years is not backed by any evidence. This as an alternative to car parking relating to individuals' households is not realistic. It also seems very unsupportive to older residents, people with young children and residents with health conditions or impairments not being able to park next to their home.

Development Strategy and Principles

Q59. What are your views on the vision for Hastings Fringes and surrounding settlements?

Q60. What are your views on the distribution and opportunities for growth in settlements within the sub-area in figures 17, 18 & 19?

Q61. What are your views on the potential sites identified in the draft HELAA that could accommodate more growth in Hastings Fringes and surrounding settlements?

102. Councillors confirmed that they still do not support the Cottage Lane site and uphold their comments submitted in objection to this site along with the 100+ local objections. The Parish Council is also very unclear how 50 additional properties have been identified within Westfield, yet none have been allocated within the Hasting Fringes area sitting within Westfield Parish. Two sites have been identified in the Hastings Fringes which could hold 60+ houses. The Parish Council feel these sites would be far better as they have also been identified as a 'proposed site'. Then a smaller number should be allocated to Westfield Village area as the Parish Council is aware the strain the Doctors Surgery is already under. If 20 houses were allocated for the village on smaller 'medium sites' of 4/5+ houses rather than going for windfall. There seems a greater opportunity to meet the needs of the local community in these smaller sites within the defined development boundary. However, without a full site review it is unclear how officers can put strategic numbers within the plan as they have no concrete evidence that the sites in any of the areas across Rother can meet those numbers.

103. At Full Council in the July 2024 meeting Westfield Parish Council resolved to start a Neighbourhood Plan and designate Westfield Parish as the area for the Neighbourhood Plan. As previously stated it is unclear how this decision will feed into the site allocations but Councillors question the 'proposed sites' within the Parish and the deliverability of those numbers as opposed to having the housing on in the Hastings Fringes which would be nearer to the hospital, schools, transport links to key services within Hastings, secondary and primary schools and near Kings Church which host the foodbank for any resident needed this.

104. Geographically and on a policy level the 'Hastings Fringes' needs to be seen as a separate settlement cluster. However, what is lacking is the strong policies within policy DEV6 Strategic Green Gaps giving that clarity between Hastings and neighbouring Parishes. There needs to be stronger language showing that whilst neighbouring Parishes do have a fringe with Hastings, they themselves as a core Parish and village are NOT a suburb of Hastings but in fact set in a rural setting with distinct local character and features of a rural village. It also needs to be better noted that whilst geographically Westfield, Guestling, Fairlight etc are 'near' to Hastings many of the transport links are woefully poor and access to the services is extremely limited.

PLEASE NOTE – Questions 62 – 71 are about potential sites within the HELAA within other areas.

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

Q73. Are there any alternatives or additional points the Council should be considering?

105. Concerned the 'Spatial Strategies' have not been translated into area specific policies as seen in the 2014 Core Strategy. This has been completely missed out, the vision for the countryside is further concerning as policies in Chapter 12 of the 2014 Core Strategy under Rural Areas have been removed including RA1 – villages and RA2 General Development for the Countryside. This seems to weaken the protection of all the countryside in Rother in or outside the HWNL.

- 106.** The version in the draft Local Plan seems undefined and not strong on defining the rural areas. In the 2014 Core Strategy there were 12 objectives and a specific chapter keeping all the rural characteristics and policies in chapter. This gave clear definition around the rural areas. In the new draft Local Plan, the policies are weaved across many other policies and cross referenced which is very confusing to follow.
- 107.** Rather than protecting the rural areas it states it is strictly limiting development but then outlines new development which be allowed to support local agricultural (yet this includes development in isolated places re policy ECO7), tourism or housing needs (especially affordable housing). Yet the housing need and especially affordable housing need is cited throughout the draft Local Plan to cover the whole of the District and not limited to the needs of that local area/Parish.
- 108.** It is also very unclear why the term ‘countryside’ is repeatedly put into quotation marks. This seems very inappropriate. The countryside is a fact. When you put words in quotation marks in usually implies the writer doesn’t agree with the term or using it ironically. This persistence of putting this descriptive word in quotation marks is rather concerning about the implications of how Rother Officers are viewing the countryside.

Proposed Policy DEV1: General Development Consideration

Policy Status:	Strategic
New Policy?	No. Review of Policy OSS4 of the Core Strategy
Overall Priorities:	Green to the Core & Live Well Locally

Q78. What are your views on the Council's proposed policy on general development considerations?

Q79. Are there any alternatives or additional points the Council should be considering?

- 109.** It’s disappointing that Location of development OSS3 has been removed outlining the key principles for ‘Location of Development’. As a core development strategy in the 2014 Local Plan, it gave a good, solid understanding about the core principles but has not been included in the 2020-2040 plan. Whilst some of the themes appear across other policies the 2020-2040 plan is not as tight and user friendly as the 2014 Plan and 2019 DaSA. With so much cross referencing across the entire 2020-2040 Plan and removal of clear core policies the idea of what makes suitable ‘locations for development’ is lost.
- 110.** The same can be said for the removal of policy OSS1. This was a clear and coherent strategy of where development should and should not happen. Across the new draft Local Plan 2020-2040 this has been lost and almost no clear distinctions between Bexhill, Battle and Rye, villages and small in-fill. These ideas are spread across the draft Local Plan but in a way that it is difficult to identify the specific strategic strategies for each area.
- 111.** As with the first section of policies many of these seem to be written for large scale urban masterplanning rather than considered policies for a District in a predominately rural setting and most of that within the HWNL.

Proposed Policy DEV2: Comprehensive Development and Masterplanning

Policy Status:	Strategic
New Policy?	No. Review of Policy DIM1 of the DaSA
Overall Priorities:	Green to the Core & Live Well Locally

Q80. What are your views on the Council's proposed policy on comprehensive development and masterplanning?

Q81. Are there any alternatives or additional points the Council should be considering?

- 112.** When comparing the policy against (v) In respect of residential development, is of a density appropriate to its context, having due regard to the key design principles. – This has been removed. Density is a key issue in rural areas. Why has this been removed no explanation has been given. Wording is weak and open to too much interpretation in relation to not detracting from the character and appearance of the locality. This is also not explained.
- 113.** Much better wording re masterplanning. However, how would this be upheld in current planning system? What conditions would be legal and useable to ensure the masterplan is adhered to especially re outline planning.
- 114.** Unclear how Rother Officers will sense check what is the area that can potentially be developed? Is it possible to ensure conditions are put in place about expanding and developmental creep.
- 115.** It feels something is missing in relation to BNG and the need to deliver this on site and should be accounted for in the masterplanning especially if there are nearby green spaces owned by the same developer. By earmarking areas for BNG could this potentially protect the remaining site and/or neighbouring sites?
- 116.** Shame the concept for whole farm plans have not been included. An interesting concept to allow all the land across farms to be considered.

Proposed Policy DEV3: Development Boundaries

Policy Status:	Strategic
New Policy?	Yes.
Overall Priorities:	Green to the Core & Live Well Locally

Q82. What are your views on the Council's approach to development boundaries?

Q83. Are there any alternatives or additional points the Council should be considering?

- 117.** This is not a new strategy it is the rewriting of policy OSS2 'Use of Development Boundaries' in the Core Strategy and has now been completed reworded and removed many of the protections for development boundaries.
- 118.** *"5.117 While land outside development boundaries is regarded as 'countryside' for planning policy purposes, it does include some villages, hamlets and farmsteads. A countryside location does not prevent appropriate development. The potential for development outside development boundaries to support vital rural communities and also conserve or enhance its intrinsic qualities is recognised. There are specific policies to promote a sustainable rural economy, including farming, tourism and to meet recognised local needs for facilities or affordable housing both in other policies of the Local Plan."* – Serious concern over this wording. Development is no longer

ring fenced by development boundaries so anywhere within the ‘countryside’ (inappropriate quotations used again) is essentially allowed applying to any of the other policies within the draft Local Plan with the noticeable addition of Affordable Housing. It is unclear how this will then be measured for sites outside of the development boundaries. If this is read with the later policies on Affordable Housing it is clear the development boundaries are no longer protected. This seriously undermines the protections of the HWNL especially where ‘affordable housing’ is mentioned suggests there is a strong weight in favour and balanced tipped against protecting the HWNL.

- 119. Affordable housing within the countryside and HWNL is already available via exception sites and development within development boundaries and should NOT be included here or later policies to allow development outside these boundaries within the countryside. The parameters become too wide and vague and open to abuse and to degrade the HWNL.
- 120. Concern about the wording in policy which indicates that development outside the development boundary is allowed against ‘other policies’. This is far too subjective and removes the clear guidelines about where development is allowed within the countryside.
- 121. *“A countryside location does not prevent appropriate development”* – However this is not recognising that the majority of countryside within Rother is within the HWNL. By not explicitly outlining this leaves this policy open for interpretation as it is weighing against policies across the draft Local Plan rather than any clear protections of the development boundaries and the HWNL or ‘countryside’.

Proposed Policy DEV4: Retention of Sites of Community or Economic Value

Policy Status:	Strategic
New Policy?	No. Updated version of DaSA Policy DCO1
Overall Priorities:	Live Well Locally

Q82. What are your views on the Council’s approach to development boundaries?

Q83. Are there any alternatives or additional points the Council should be considering?

- 122. Policy is almost the same, but part (ii) has been strengthened which is a positive for keeping commercial and economic assets in rural areas.
- 123. Values of selling the property should be realistic and show the offers given for properties to show serious consideration has been given to the offers not just dismissed. ‘Independent’ needs to be actually independent not paid for by the applicant.
- 124. Should always give renewed evidence of marketing with repeat applications.
- 125. No mention of Parishes being able to tag items for community value as per the localism act 2011. Would be useful to have this highlighted to help protect community assets.

Proposed Policy DEV5: Development on Small Sites and Windfall Development

Policy Status:	Strategic
New Policy?	Yes.
Overall Priorities:	Green to the Core & Live Well Locally

Q87. What are your views on the Council's strategy approaches to small sites and windfall development?

Q88. Are there any alternatives or additional points the Council should be considering?

126. No stats have been given on the breakdown of windfall sites between rural and urban. Windfall sites are a greater asset in rural communities, but these are not supported as much locally as they do not go towards figures.

127. Windfall sites should be under 4 dwellings. Anything 4+ should be allocated within NPs where suitable. Likely to have smaller sites come forward and greater support from Parish Councils and communities. Medium sites of four or more houses could then go towards the numbers in Parishes and make it easier achieving those numbers allocated in the rural areas.

Q89. 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%?

128. Keep at 10% to support smaller development in rural communities. There should be clear stats within the draft of where the 24% of windfall sites came from between Bexhill, Battle and Rye and the rural Parishes. Based on this evidence this should frame this policy.

Proposed Policy DEV6: Strategic Green Gaps

Policy Status:	Strategic
New Policy?	Revision to Policy DEN3 of the DaSA
Overall Priorities:	Green to the Core & Live Well Locally

Q90. What are your views on the Council's approach to strategic gaps and those that are identified?

Q91. Are there any other areas of the District that the Council should be considering, and if so, what evidence is available?

129. The lack of clarity on Development boundaries makes strategic gaps for rural communities even more important.

130. No mention of the general need for strategic gaps outside the core ones named in the policy. There needs to be some understanding and clarity to ensure defined boundaries within Parishes between wards. As Westfield there needs to be clarity and a strong strategic gap between the wards and a to keep a strong identity as a rural village rather than seen as a Hastings suburb.

Health and Wellbeing

Proposed Policy HWB1: Supporting Health and Wellbeing

Policy Status:	Strategic
New Policy?	Yes, but incorporating CS Policy CO2
Overall Priorities:	Live Well Locally

Q92. What are your views on the Council's proposed policy on supporting health and wellbeing?

Q93. Are there any alternatives or additional points the Council should be considering?

- 131.** Whilst this is a very worthy how will this actually be implemented. For example, point v) reducing social isolation especially in rural areas how could this be achieved? It seems that Rother Officers have not engaged the rural GP surgeries so capacity to help provide health and mental health support or spaces to run community engagement centres is not clear. There appears to be a serious lack of understanding from Rother Officers the impact on facilities such as care homes would have on these rural GPs and threaten their existence.
- 132.** Whilst this is a very positive policy there is little or no recognition on the positive impacts open countryside, and green spaces has on people's wellbeing. Many Local Authorities are working with NHS Trusts to promote this so it would have been useful to have a similar reference within this policy in using green spaces and the countryside to support local health.
- 133.** Many of the proposals are allowing development as long as there they are in 800meters of shops etc which for older residents is unsuitable. People are being asked to walk along 'walkable routes' not footpaths so seem to disenfranchise anyone not able to walk these distances and potentially enhance isolation for older and less able-bodied residents.
- 134.** Issues re affordable housing not being built in the areas where the need is. Removing people from their jobs/schools and social networks increases loneliness and isolation. There seems a very concerning trend where housing need is not being delivered directly in the areas needed. Much of the 100% affordable housing has been delivered in the rural areas including:
- Westfield x 39
 - Ticehurst x 40
 - Hurst Green x 26 + 28 = 54
 - Robertsbridge potential of 'Mill Site' x 96 bought by Homes England to turn into 100% AHU
- Affordable housing is needed in the rural areas BUT it needs to serve the community it is being delivered in or at least 80/90% needs to match the housing need and tenure for that local community. Local Lettings Plans would achieve this along with allocating vacant housing also with residents from that area would be a great advantage but not featured. In which case you create a situation where people are continuously moved around the District away from support networks, rural areas are filled with people outside of that area usually people who don't want to be in a rural setting. When rural people then need housing in that area it isn't available. All of this has a huge impact on people's mental health and needs addressing.
- 135.** If read in context with 'compact development' policy little consideration seems to be given on size of gardens and reducing pollution through tree planting within developments rather than just tree lined streets which will not be practical on all developments. Decent well delivered housing needs good green spaces with green gaps not trying to squeeze and go over maximum densities anywhere in the District in rural and urban settings. Piling people on top of each other

with limited access to good green spaces has been demonstrated to have serious impact on people's day to day lives and mental well-being.

136. Point vi) will only work if suitable gardens are delivered in developments. This raises the issues related to some of the other 'density' policies. This includes reducing the number of houses being built in back gardens which results in diminishing the overall available green spaces within the area.

Proposed Policy HWB2: Health Impact Assessments

Policy Status:	Strategic
New Policy?	Yes
Overall Priorities:	Live Well Locally

Q94. What are your views on the Council's proposed policy on requiring a Health Impact Assessment for certain applications?

Q95. Are there any other types of application, and/or different scales of development, the Council should be considering?

137. Excludes the rural areas. Misconception about 'affluent area' and those in smaller pockets of deprivation will be lost or ignored. There should be some format which recognises this impact in smaller developments which will traditionally be in the rural areas. Lots of hidden poverty in rural areas matched with serious lack of services. Therefore, this should apply to all developments over 100 houses but any development between 30-50 in rural areas should have some form of HIA because of the rural isolated features of the villages and zero services.

Proposed Policy HWB3: Reducing Harmful Impacts on Health

Policy Status:	Strategic
New Policy?	Yes, but incorporating DaSA Policy BEX17's third paragraph
Overall Priorities:	Live Well Locally

Q96. What are your views on the proposed policy for reducing harmful impacts on health?

Q97. Is the Council considering the right types of commercial uses or should it be considering other uses?

138. Good policy

Proposed Policy HWB4: Community Facilities and Services

Policy Status:	Strategic
New Policy?	No. Updated version of Core Strategy Policy CO1
Overall Priorities:	Live Well Locally

Q98. What are your views on the Council's proposed policy on community and social facilities and services?

Q99. Are there any alternative or additional points the Council should be considering?

Q100. What are your views on the range of uses that are covered by this policy?

139. Good policy

Proposed Policy HWB5: Green and Blue Infrastructure

Policy Status:	Strategic
New Policy?	No. Updated version of Core Strategy Policy CO3
Overall Priorities:	Live Well Locally and Green to the Core

Q101. What are your views on the Council's proposed policy on green and blue infrastructure?

Q102. Are there any alternative or additional points the Council should be considering?

- 140.** Very concerned that HWNL is not specifically mentioned in this policy particularly in footnote 41. Green infrastructure should include wildlife corridors and wider green networks and importantly hedgerows especially as this policy is strategic yet policy LAN2: Trees, Woodland and Hedgerows is a non-strategic policy.
- 141.** Wording is stating 'only permitting it's loss where it results in improved provision...as part of development or elsewhere within the locality'. This is very concerning as clearly signals losses are allowed if put elsewhere. There is lack of clarity about this as the items listed in the footnote includes open spaces, woodlands and street trees. Many of these will be well established and usually replaced with sub-standard and poorly maintained alternatives. Whilst better aligned with playing fields etc there needs to be more clarity.
- 142.** Concerning that in the 'Pitch and Built Facilities Strategy' seems to seriously underestimate the cost of the needed changing rooms at £290k considering the size and facilities required by the English Cricket Board. Westfield Parish Council has been identified as a 'Lead' with WCC but no indication how these facilities could be delivered locally and goes back to the issues about lack of clarity about CiL funding available in the rural areas vs the need.

Q103. Do you feel that this policy is sufficient to protect open space?

- 143.** Policy is very urban focused and doesn't seem to really understand the significant impact this could have in rural areas especially as the term 'locality' is not determined and indicates could be taken outside of the Parish.

Proposed Policy HWB6: Public Rights of Way

Policy Status:	Strategic
New Policy?	Yes.
Overall Priorities:	Live Well Locally & Green to the Core

Q104. What are your views on the Council's proposed policy on public rights of way?

Q105. Are there any alternative or additional points the Council should be considering?

- 144.** Overall policy seems supportive to manage and retain these important rights of way. Concerns if any planning conditions relate to changes to the rights of way without consent or agreement sought first from the landowner and should be a significant consideration.

Infrastructure

Proposed Policy INF1: Strategic Infrastructure Requirements

Policy Status:	Strategic
New Policy?	No
Overall Priorities:	Live Well Locally

Q109. What are your views on the Council's proposed policy on strategic infrastructure requirements?

- 145.** CiL is very bias and unbalanced because of the way CiL is handed out. Fairlight PC is an example were requests for improvements turned down based on lack of development in the Parish. Smaller rural areas have no chance of ever getting significant infrastructure.
- 146.** Issues with 100% affordable – Hurst Green lost over £30k in CiL to redevelop the playground and Parish Councils do not have the reserves to plug such gaps in funding. That money was lost to the community despite the policies in the Local Plan and serious concerns from the Parish Council. A clearer plan to support areas where high levels (in relation to the local and immediate population) of 100% affordable housing is being delivered attracting no CiL funding.
- 147.** No cohesive plan for wider rural need and identified need in the Infrastructure Delivery Plan seems very lacking around health, community infrastructure, and transport in identifying the needs in the rural communities with many rural areas not even mentioned. This should be done across the rural areas in partnership with the Parishes. For example, Westfield Parish is in great need of a village hall, yet this is not mentioned. What evidence to justify new infrastructure from Parish Councils to get this money and what is in the current pot along with what is the projection of the pots increase needs greater detail and consideration.
- 148.** Viability of infrastructure is routinely ignored. Serious concern over zero consultation with GPs so Rother Officers have no idea of the clinical space needed in the rural areas.

Q111. 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?

- 149.** This in theory sounds a good plan but there is no detail on how this will be delivered. Within Westfield we see time and time again the local GP not consulted with and no infrastructure discussion with frontline providers. There also is the Rural Rother Primary Care Network which is not mentioned within the draft Local Plan. The same with the local school. If infrastructure is going to be properly considered this needs to happen across all levels not just at the high end which regularly lacks local detail and knowledge.

Proposed Policy INF2: Digital Connectivity

Policy Status:	Strategic
New Policy?	Yes, building on Policy EC1 (vii) of the Core Strategy
Overall Priorities:	Live Well Locally

Q112. What are your views on the Council's proposed policy on digital connectivity?

- 150.** Why only Major? This is a serious issue which would allow rural areas to thrive and is often forgotten. Is this not already a requirement for new development?

Housing

Proposed Policy HOU1: Mixed and Balanced Communities

Policy Status:	Strategic
New Policy?	No – update to Core Strategy Policy LHN1
Overall Priorities:	Live Well Locally

Q114. What are your views on the Council’s proposed policy on mixed and balanced communities?

Q115. Are there any alternatives or additional points the Council should be considering?

151. Many of the other policies have comments which would relate to this policy so are duplicated here. Areas should have the local need considered in line with the housing register need and aligned with Local Lettings Plans.
152. Lack of % of affordable housing and with no figures and relying on the ‘exact mix of housing sizes and types’ to be discussed with officer on a case by case basis. For many rural communities this will be concerning after the trend of delivering high levels of affordable housing proportionally within the rural Parishes vs Battle, Rye and Bexhill especially considering the high need in Bexhill for affordable rented accommodation.
153. The levels of market housing and the need for one and two bedrooms is positive. However, this should be in line with the need in the area as well.
154. First Homes are strongly welcomed considering the need for these in the Parish to enable younger families to stay within the community. However better clarity on intermediate affordable dwellings’ should have a clear definition. This is because of the impact of shared ownership. This is deemed an ‘affordable’ housing route yet due to the size of the 2/3/4 bedroom properties and their market value many of these are not truly affordable especially taking into account the service charges that can be applied. It would be useful to have a ‘cap’ on the cost of these intermediate affordable dwellings, so they do remain truly affordable.
155. Section iv) of the policy is far too vague within the policy itself and clear guidance should be given in what this would look like.

Proposed Policy HOU2: Affordable Housing

Policy Status:	Strategic
New Policy?	No – update to DaSA Policy DHG1
Overall Priorities:	Live Well Locally

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

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

156. There seems a lot of repetition between policies HOUS1/HOUS2/HOUS3. These policies seem that they could be far better aligned in two policies.
157. Lack of % of affordable housing and with no figures and relying on the ‘exact mix of housing sizes and types’ to be discussed with officer on a case by case basis. For many rural communities this will be concerning after the trend of delivering high levels of affordable

housing proportionally within the rural Parishes vs Battle, Rye and Bexhill especially considering the high need in Bexhill for affordable rented accommodation.

- 158.** Unless development is delivered to meet the specific housing need of that area. Otherwise, disadvantaged people are being removed from their community networks and put into rural area with no proper infrastructure. There seems a very concerning trend where housing need is not being delivered directly in the areas needed. Much of the 100% affordable housing has been delivered in the rural area including:
- Westfield x 39
 - Ticehurst x 40
 - Hurst Green x 26 + 28 = 54
 - Robertsbridge potential of 'Mill Site' x 96 bought by Homes England to turn into 100% AHU
- 159.** Affordable housing is needed in the rural areas BUT it needs to serve the community it is being delivered or at least 80/90% needs to match the housing need and tenure for that local community. This ensures some of the affordable housing is mainly for local people, but a section is always open for new people coming into the communities IF they wish to and suitable support is given. Local Lettings Plans would achieve this along with allocating vacant housing also with residents from that area would be a great prevention of this but not featured. A situation is then created with people being continuously moved around the District away from support networks, rural areas are filled with people outside of that area usually people who don't want to be in a rural setting. When rural people then need housing in that area it isn't available.
- 160.** No mechanism to allow for a percentage of affordable housing within an area vs the historic and projected delivery. This is very concerning as areas such as Westfield and particularly Robertsbridge seem to be having much higher levels of affordable housing above and beyond the need of the direct local community especially in comparison to other higher populated areas. Failure to do this can have serious implications to maintaining a 'balanced community'.
- 161.** Shared Ownership is a disaster and regularly reported on the unaffordability of these properties. Much better options to support residents within Rother to get families into properties. This is particularly relevant on the housing type and size when in relation to shared ownership properties and the overall affordability e.g. a large scale detached four bed house vs a smaller three bed property which maybe smaller but would then be generally affordable for a local Rother resident to attempt to purchase. Looking at the makeup of Westfield much more housing for First Time homes and older residents is what is needed, and this is not reflected Parish by Parish unless they have a Neighbourhood Plan but reference to this in the draft Local Plan should also be made especially for those Parishes and Town Councils without a NP.

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

- 162.** This question has different considerations for different areas and impossible to argue and tries to put a very complex matter into unrealistic and simplistic terms. If you are continuously accepting planning within in one ward or Parish for 100% affordable housing and also taking into account, the size of the developments the loss of CiL can be quite catastrophic. Putting large volumes of affordable housing in an area which is rural, low connectivity, low job opportunities, low childcare support options vs putting affordable housing in an area which has all of those services makes a huge difference if CiL is then continuously not obtained because

where is the funding coming from to create these opportunities and services for those going into affordable houses and those already in the communities. Again, impact on GP surgeries could be huge with little or no investment coming forward. CiL is so important to the rural areas which is why 100% affordable housing is so damaging for some of the more 'minor' infrastructure for our play areas, sports facilities and community buildings. A very disappointing question.

Proposed Policy HOU3: 100% Affordable Housing Developments

Policy Status:	Strategic
New Policy?	Yes
Overall Priorities:	Live Well Locally

Q119. What are your views on the Council's proposed policy on 100% affordable housing developments?

Q120. Are there any alternatives or additional points the Council should be considering?

- 163.** No distinction between rural and urban which have significantly different needs etc. and services to support people in affordable housing.
- 164.** Serious danger of consigning rural areas to ONLY have 100% affordable housing due to, limited and therefore NOT creating mix communities. Caps on rural areas should be given for the time period of the draft Local Plan to ensure open market developments can also be brought forward. The reference to developing outside development boundaries policy DEV3 which identifies affordable housing in paragraph 5.117 as an acceptable balance to build in the countryside is very concerning.
- 165.** Read 8.44 – 'local need' is not defined as the local area i.e. the Parish. This is a serious issue as need in Bexhill which is so high is being delivered in non-sustainable areas in the rural communities. As there is so much repetition in this policy as found in HOU1 and HOU2 the same issues apply so to repeat Affordable housing is needed in the rural areas BUT it needs to serve the community it is being delivered or at least 80/90% needs to match the housing need and tenure for that local community. This ensures some of the affordable housing is mainly for local people, but a section is always open for new people coming into the communities IF they wish to and suitable support is given. Local Lettings Plans would achieve this along with allocating vacant housing also with residents from that area would be a great prevention of this but not featured. A situation is then created with people being continuously moved around the District away from support networks, rural areas are filled with people outside of that area usually people who don't want to be in a rural setting. When rural people then need housing in that area it isn't available.
- 166.** No mention of sheltered accommodation for older residents. Serious need in the rural areas in relation to the housing need for the area. Whilst in policy HOU9 this policy is about mixed and balanced communities. Rother has a higher share of older residents so should be core to this policy. No mention of local letting policy to meet the needs of the local area.
- 167.** No mechanism to allow for a percentage of affordable housing within an area vs the historic and projected delivery. This is very concerning as areas such as Westfield and particularly Robertsbridge seem to be having much higher levels of affordable housing above and beyond the need of the direct local community especially in comparison to other higher populated areas. Failure to do this can have serious implications to maintaining a 'balanced community'.

There is no mention of the current housing need figures in relation to Bexhill, Rye, Battle or any limits or percentages to reflect the actual need in those areas? Reference is only to the HENDA which is a very unfriendly document. Better effort and clear stats in the explanatory text for each policy justifying this need in relation to each area is needed.

- 168.** Point 155 should be taken into consideration when looking at number of 100% affordable housing sites and CiL contributions. In paragraph 8.40 this is alluded to will be considered but this is not good enough and the overall delivery for the last 6/10 years should be considered.
- 169.** Agree with paragraph 8.42 IF this delivery for social and affordable rented is on the basis for the Parish/ward specific need not just the overall need in the District which largely sits in the more urban areas.
- 170.** Not having clear guidance rather ‘identified through discussions’ in not acceptable considering the trends seen to load this into the rural communities far outweighing local need.
- 171.** Whilst not a statutory requirement considering the housing need for younger and older residents this should be a key figure and requirement for any affordable housing development especially those being proposed at 100%.
- 172.** This policy directly conflicts with HOUS1 as to get a truly mixed and balance community you need a proper mix of housing including open market. Single tenure sites whether they are affordable housing or open market do not make mixed and sustainable communities and encourage segregation.

Proposed Policy HOU4: Allocating Sites for Wholly or Substantially Affordable Housing

Policy Status:	Strategic
New Policy?	No – update to Core Strategy Policy LHN4
Overall Priorities:	Live Well Locally

Q121. What are your views on the Council’s proposed policy on allocating sites for wholly or substantially affordable housing?

Q122. Are there any alternatives or additional points the Council should be considering?

- 173.** How is this different to exception sites? Why is this needed?
- 174.** Some significant change to the LHN4 policy is there is no requirement for the proposed developments to be ‘adjacent to settlement boundaries’. This is a significant change as it opens up the opportunity for wider development across the countryside as the only requirement is to be ‘close to local services including public transport connections’. In reality this mean development can be isolated in the countryside as long as they are next to a bust stop.
- 175.** This policy should not be allowed. It removes the need to consider rural/Parish needs and further allowing development within the HWNL and seriously undermines the development boundaries in the rural areas.

Proposed Policy HOU5: Rural Exception Sites

Policy Status:	Strategic
New Policy?	No – update to DaSA Policy DHG2
Overall Priorities:	Live Well Locally

Q123. What are your views on the Council’s proposed policy on rural exception sites?

Q124. Are there any alternatives or additional points the Council should be considering?

176. This policy is undermined by HOU4 and if HOU4 is allowed exception sites will not be considered as HOU4 is an easier way to get development in the rural areas, outside the development boundary without considering the local need.

177. It is also concerning for rural areas that policy HOU3 is being considered when this policy for exception sites in rural locations is far better at serving the rural communities.

Proposed Policy HOU9: Specialist Housing for Older People

Policy Status:	Strategic
New Policy?	No – update to DaSA Policy DHG5 and Core Strategy Policy CO5 (ii)
Overall Priorities:	Live Well Locally

Q131. What are your views on the Council’s proposed policy on specialist housing for older people?

Q132. Are there any alternatives or additional points the Council should be considering?

178. HOU2 should be explicit about state housing for older people. Especially as Rother as a high level of older residents and they should be explicitly named in other key Housing Policies in relation to the rural areas.

179. Whilst this is welcomed again very concerning when read against other policies allowing where development in rural areas and the HWNL could be i.e. more than 800mtres away from services. Does this constitute as ‘walkable’ as outlined in paragraph 8.79. Very unclear.

180. Considering the level of detail in other policies it is disappointing this is not reflected here. Growing communities for older residents is a key concern but this growth should be encouraged in the heart of our communities not ousted into more inaccessibly area outside development boundaries.

181. It is very strange that the HENDA identified there is no need for ‘retirement living or sheltered accommodation’? Was this area specific? In rural areas this is a need.

182. Developments over 40 houses should require 10% of older resident accommodation considering the current and future need. It is accepted that some housing for older residents wouldn’t work but age-restricted general market housing would.

Proposed Policy HOU10: Residential Care Homes for Older People

Policy Status:	Strategic
New Policy?	Yes
Overall Priorities:	Live Well Locally

Q133. What are your views on the Council's proposed policy on residential Care Homes for older people?

Q134. Are there any alternatives or additional points the Council should be considering?

- 183.** What is good access as policy DEV6 states this can be 800m in urban but in countryside settings this can be more.
- 184.** Serious concern about lack of understanding about clinical space and capacity in the rural areas. Officers wanted to approve a 64-bed care despite serious concerns from the local GP surgery who very strongly stated they did not have the capacity to have such a facility in the Parish especially with another Care Home in the area.
- 185.** There needs to be a consideration on the existing provision of care homes within the area as this will also lead to an additional impact on the GP services vs a ward or Parish that doesn't have any care homes within their borders.
- 186.** Should be robustly justified in policy and defined as they do for economic sites.
- 187.** Why is there not a growing demand for residents? This should be explained and made clearer. Not stats given in paragraph reference. This conflicts with comments from Edwin Corke re Moorhurst in Westfield for a 64-bed care home saying in his report when looking for full permission "Therefore, assuming reasonable lead in times for construction and operation, the provision of 64 care bedspaces would make a timely and meaningful contribution to the District's C2 registered care bedspace need in the immediate future." How can a Rother Planning Officer justify the harm to the HWNL in an unsustainable area trying to approve a care home when the draft Local Plan and HENDA is stating that the future for the need is unknown

Proposed Policy HOU11: Gypsies, Travellers and Travelling Showpeople Criteria

Policy Status:	Non-Strategic
New Policy?	No – Update to Core Strategy Policy LHN6
Overall Priorities:	Live Well Locally

Q135. What are your views on the Council's proposed policy on Gypsies, Travellers and Travelling Showpeople?

Q136. Are there any alternatives or additional points the Council should be considering?

- 188.** Clarity needs to be given on the balance of need of the sites vs the impact on the landscape and character. Section iii) of the policy indicates mitigation again rather than a clear distinction of restricting certain sites based on their impact on the HWNL. Whilst it is important there are enough suitable sites there should not be an assumption these can be anywhere in the HWNL in the same way development cannot happen everywhere. Language needs to be clearer.
- 189.** Point vii) needs further clarity on what unreasonable harm to the amenity of adjoining properties actually means as currently far too subjective.

- 190.** Provision needs to be made to ensure the requirements to ‘safely access’ the sites doesn’t undermine the HWNL or mean extensive removal of hedgerows etc to achieve this access.
- 191.** Small scale would be 5 and under not 10. Issues if the site could be increased therefore the policy should be closer to 5 with the option to extend to 10 if a need was identified. ‘Open sites’ should be viewed with caution there should be clear limitations within the sites to stop ongoing expansion and creep outside the agreed boundaries within the site.
- 192.** More effort needs to be given for suitable sites for gypsies, travellers and travelling showpeople on truly sustainable plots. The policy should state (in line with national policy) that sites within the countryside are strictly limited, and preference is for sites to be allocated within existing settlements.

Proposed Policy HOU12: Self-Build and Custom Housebuilding

Policy Status:	Strategic
New Policy?	No – Update to DaSA Policy DHG6
Overall Priorities:	Live Well Locally

Q137. What are your views on the Council’s proposed policy on Self-Build and Custom Housebuilding?
 Q138. Are there any alternatives or additional points the Council should be considering?

- 193.** Lack of clarification on how modular houses fit into this.
- 194.** Much better clarity in the final paragraph and very welcomed with points a-d outlined.

Proposed Policy HOU13: New Dwellings in the Countryside

Policy Status:	Strategic
New Policy?	No – update to Core Strategy Policy RA3 (iii)
Overall Priorities:	Live Well Locally

- 195.** Paragraphs 8.118 and 8.119 very concerning as the whole purpose of the development boundary is to stop single dwellings in the countryside. Does not protect the HWNL.
- 196.** Section v) is concerning because the opportunities it is opening up for care homes etc to be built within the rural areas.
- 197.** Concerns this policy raises:
- Issue of these green areas on the edge of development boundaries usually are agricultural land and this encourages the general eroding away of the countryside.
 - By allowing development on the edge allows constant development creep into the countryside with no stopping.
 - The development boundary should be a clear indicator of where development happens. Too many policies are ignoring DEVELOPMENT BOUNDARY and putting the HWNL at risk.
 - Totally not enforceable re first and second homes.
- 198.** This policy creates too many opportunities to build outside development boundaries and is not properly protecting the HWNL.

Q142. 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?

- 199.** Policy section vi) re infill gaps is too open to abuse. No definition given on the size of the gap or the placing of this within the countryside. The green gaps stop ribbon development, and the green gaps create rural and semi-rural settings rather than an urban design with all green gaps filled in. These green gaps are also key for some wildlife especially moths and glow worms and would impact on dark skies in the HWNL.
- 200.** This section of the policy is also another option to allow continuous ‘creep’ into the countryside and into the HWNL.

Q143. 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)?

- 201.** Whilst this seems a sensible and welcomed restriction, own experience in Westfield is there is limited resources within Rother to actually monitor and enforce such ideas. However, inventive ideas are needed as second homes, Air B and Bs and holiday homes are a serious issue in restricting housing stock for local need.

Proposed Policy HOU14: External Residential Areas

Policy Status:	Non-Strategic
New Policy?	No – Update to DaSA Policy DHG7
Overall Priorities:	Live Well Locally

Q144. What are your views on the Council’s proposed policy on external residential areas?

Q145. Are there any alternatives or additional points the Council should be considering?

- 202.** Too much emphasis on cycling when this is not a realistic mode of transport for many in Rother particularly in rural areas or considering the narrow character of many main roads.
- 203.** Point iii) should be for all developments one or more and in particular ‘fully accessible’ for refuse collection. Refuse in position on the site needs to take into account the hot weather and impact on residents.
- 204.** Cycle spots on housing for older residents should not be a requirement and these spots taken up for mobility scooters.

Proposed Policy HOU15: Extensions to Residential Gardens

Policy Status:	Non-Strategic
New Policy?	No – Update to DaSA Policy DHG8
Overall Priorities:	Live Well Locally

Q147. What are your views on the Council’s proposed policy on extensions to residential gardens?

Q148. Are there any alternatives or additional points the Council should be considering?

- 205.** Modest needs better definition either a scale or % increase. Needs to be defined.

206. Any extensions of gardens should not be at the detriment of existing green infrastructure hedgerows etc. and planning conditions need to be given restricting the use of that land for any future opportunities for trying to build housing on that land.

Proposed Policy HOU16: Extensions, Alterations and Outbuildings

Policy Status:	Non-Strategic
New Policy?	No – Update to DaSA Policy DHG9
Overall Priorities:	Live Well Locally

Q149. What are your views on the Council’s proposed policy on extensions, alterations and outbuildings?

Q150. Are there any alternatives or additional points the Council should be considering?

207. Needs further definition. Especially for three bay car ports with living accommodation at the top. Scale of ‘outbuildings’ should be taken into consideration especially those that could be converted into small/medium dwellings within the countryside. Therefore, there should be a clear need to justify e.g. a three-bay garage WITH additional living space above. Should be either or and overall mass of the outbuilding should be considered i.e. one floor or two floors and use of dormers which on both sides give a distinct ‘dwelling’ appearance.

Proposed Policy HOU17: Annexes

Policy Status:	Non-Strategic
New Policy?	No – Update to DaSA Policy DHG10

Q151. What are your views on the Council’s proposed policy on annexes?

Q152. Are there any alternatives or additional points the Council should be considering?

208. Needs comment on access and opportunity to divide building off from main dwelling even if it is in close proximity.
209. There should not be separate services this should come from the main dwelling to minimise any risk of annexes becoming separate dwellings.

Proposed Policy HOU18: Boundary Treatments and Means of Enclosure

Policy Status:	Non-Strategic
New Policy?	No – Update to DaSA Policy DHG11
Overall Priorities:	Live Well Locally

Q153. What are your views on the Council’s proposed policy on boundary treatments?

Q154. Are there any alternatives or additional points the Council should be considering?

210. Identical policy. Would be beneficial to add in some of the wording from paragraph 8.176 and be clearer what ‘suburban or urban styles’.
211. Concerning that in paragraph 8.179 states ‘retention is normally expected’. Surely in the HWNL this should be worded ‘will be expected especially in relation to historic or mature boundaries made up with hedgerows and trees.’

Proposed Policy HOU19: Accesses and Drives

Policy Status:	Non-Strategic
New Policy?	No – Update to DaSA Policy DHG12
Overall Priorities:	Live Well Locally

Q155. What are your views on the Council’s proposed policy on access and drives?

Q156. Are there any alternatives or additional points the Council should be considering?

212. A difficult issue with the permitted development to allow people to completely cover their front gardens with a driveway removing the green features/corridor. This is why access and drives in rural locations are better sited at the side or rear.

Economy

Proposed Policy ECO1: Supporting New Employment Development

Policy Status:	Strategic
New Policy?	Yes
Overall Priorities:	Green to the Core & Live Well Locally

Q157. What are your views on the Council's proposed policy on supporting new employment development?

Q158. Are there any alternatives or additional points the Council should be considering?

- 213.** There seems to be too much focus on farm and agricultural in the rural areas. Needs to be wider recognition that there are other forms of employment in rural communities usually small-scale entrepreneurs working from home or small units. This needs to be given considerations when discussing the 'scale and nature' of any proposals.
- 214.** Development outside the boundary again. This policy linked with ECO7 and ECO8 with no defined scales. Nothing about the numbers of those employed but point ii) of ECO8 requiring conditions to tie to existing farms is welcomed. It would also be useful to know what farming groups have been consulted with to show the need and impact. None are named in the explanatory text. This seems to be an area a missed opportunity that the National Farmers Union (NFU) and the Country Land and Business Association (CLA) have not been consulted.
- 215.** The phrase 'adverse impacts on any neighbouring residential amenity' needs better clarification especially in line with any proposed employment for forestry development or any other loud industry which is in its nature would create a lot of noise and disturbance for nearby residents. Consideration on the class of business should be given based on where it is allowed.

Proposed Policy ECO2: Protecting Existing Employment Sites and Premises

Policy Status:	Strategic
New Policy?	No. Updated version of DaSA Policy DEC3
Overall Priorities:	Live Well Locally

- 216.** Policy needs to be flexible to the different type of sites i.e. a pub vs an old garage are very different types of sites. Issues re contamination of land should be considered re viability. 'Sites' should be strongly aligned to policy DEV2 to ensure car parks and other neighbouring plots are not seen as a separate asset. If not included in the site this should be questioned and the title deed be reviewed to ensure the whole parcel of land is being considered.
- 217.** No definition of 'community uses' public houses should be given more protection as these are key within rural areas. Issues in allowing people to 'sit' in buildings and try and try again to get a conversion into housing. This can be illustrated by The Bell in Burwash. Similar issue with The Plough in Westfield yet a proposal was put forward as outlined in paragraph two of this policy to allow some conversion into market dwellings and still retain the pub in a smaller scale.
- 218.** Needs to be stronger consideration about mixed used sites. Too often sites which historically had a commercial use and could be developed out for commercial, and housing are being ignored and only used for housing for example the Mill site in Robertsbridge. In rural areas

other opportunities for employment outside of agricultural and forestry should be considered as well.

219.

Proposed Policy ECO5: Tourism Activities, Facilities and Accommodation

Policy Status:	Strategic
New Policy?	Yes
Overall Priorities:	Green to the Core & Live Well Locally

Q166. What are your views on the Council's proposed policy on tourism activities, facilities and accommodation.

Q167. Are there any alternatives or additional points the Council should be considering?

220. Point iii) is far too vague. No details on what a 'market for local produce' actually entails. Risks of allowing unsuitable development within the HWNL based on someone growing very small-scale produce. This has been seen at Hop and Hare Farm in Westfield which was a quiet area of agricultural land which has been continually up scaled to allow more and more human presence on site including a cabin which is occupied 11 months of the year yet not considered a 'new dwelling' in the countryside along with a permanently used car park and never allowing the site to 'recover' and return to a tranquil site and dramatically changes the character of the HWNL and balance should always go in support of protecting this important green space with its diverse habitats.

221. Impact on HWNL and neighbouring amenities should be repeated in this policy with great weight highlighted for both. As the Sussex Nature Recovery (SNR) plan highlights 'a very small area is currently protected' but there is also a diversity of habitats (although they cover a tiny area). If planning is always considered on a balance protection of nature and the HWNL which houses much of that nature should be given much better protection and mention in key policies such as this one.

222. Much clearer understanding of 'appropriate controls' and what this entails. Very little distinction between urban and rural areas and rural areas in the HWNL. This is not explained or expanded on in the explanatory text either.

Proposed Policy ECO6: Holiday Sites

Policy Status:	Non-strategic
New Policy?	No – carries forward DaSA Policy DEC2
Overall Priorities:	Live Well Locally

Q168. What are your views on the Council's proposed policy on holiday sites?

Q169. Are there any alternatives or additional points the Council should be considering?

223. Why has "support the conservation of biodiversity in accordance with DaSA Policy DEN4;" from DEC2 been taken out if Rother is supposed to be green to the core? Surely this policy should also be seen in line with policy ENV5: Habitats and Species?

- 224. Policy wording appears to be very subjective because it is trying to cover too many varied uses. It would seem better to have clear policies on specific site uses. This has happened in other policies.
- 225. Paragraph 9.56 is a welcomed addition as chalet/lodge style cabins are less obtrusive within the HWNL and can be clad in sustainable materials to better blend into the surrounding countryside. It also allows for more environmentally friendly and sustainable versions to be introduced at a later stage
- 226. No details of what 'small scale' is. This is far too subjective.
- 227. For this policy to be effective Rother needs to have well-funded and the right support in their enforcement team.

Proposed Policy ECO7: Agriculture Development and Forestry

Policy Status:	Strategic
New Policy?	Yes
Overall Priorities:	Green to the Core

Q170. What are your views on the Council's proposed policy on agriculture and forestry activities?

Q171. Are there any alternatives or additional points the Council should be considering?

- 228. Issues about allowing 'forestry works' in isolated sites and what constitutes as an isolated site. This work is loud and intrusive to anyone nearby so a very clear definition or minimum boundary of how far away from residents this would be.
- 229. Issues using existing buildings for forestry work shouldn't be allowed. Use for agricultural is fine but in many rural areas housing/camping/holiday lets is near farmsteads so allowing these to be used for forestry work again is not suitable and a clear minimum requirement as much of this IS covered under permitted development anyway so what buildings would this actually apply to?
- 230. Tracks can easily be converted into roads and shouldn't be allowed if the buildings are that isolated. This also directly conflicts with ECO8 where agricultural diversification must be 'accessible and can be satisfactorily accommodated by the existing or planned local road network.' This policy opens up the opportunities to carry our new road networks to isolated (and therefore in its nature tranquil) are within the HWNL and carrying out significant harm to the overall appearance and structure of the medieval landscape character and the historic routeways of the HWNL which goes against policies within the High Weald Management Plan.
- 231. If you pair this policy with other policies in the Plan, you're allowing for buildings in isolated areas to be turned into agricultural/forestry buildings with a road which down the line could easily be converted into a dwelling within 5 years.

Proposed Policy ECO8: Agricultural Diversification

Policy Status:	Strategic
New Policy?	Yes
Overall Priorities:	Green to the Core

Q172. What are your views on the Council's proposed policy on diversification of agriculture?

Q173. Are there any alternatives or additional points the Council should be considering?

232. Policy ECO7 should be removed and any additions included into this policy.

233. This policy clearly ties to the existing farm which is good but there should be a limit as you run the risk of the diversified activity taking over the main farm activities.

234. There does need to be strong consideration of the overall impact on the HWNL. Within Westfield Parish we have seen small and modest diversification to support farms which is largely acceptable based on this policy. However, the following matters should be given great consideration:

- Impact on the HWNL and neighbouring residents should be specifically mentioned again.
- Impact on the biodiversity and tranquillity should be considered.
- Scale of the 'diversification' based on a never ending and expanding business vs modest expansion to support the business. This is not mentioned within the policy and has the danger of businesses growing disproportionately to the area and landscape that they sit in. Therefore, scale should specifically cover this.

Proposed Policy ECO9: Local Employment & Skills

Policy Status:	Non-strategic
New Policy?	Yes
Overall Priorities:	Live Well Locally

Q174. What are your views on the Council's proposed policy on local employment and skills?

Q175. Are there any alternatives or additional points the Council should be considering?

235. Seems unclear the actual benefit this would bring to the District and another financial burden on the developer. Would seem more sensible to carry out on a case by case basis as this is already being achieved.

Proposed Policy ECO10: Equestrian Developments

Policy Status:	Strategic
New Policy?	Yes
Overall Priorities:	Green to the Core

Q176. What are your views on the Council's proposed policy on equestrian developments?

Q177. Are there any alternatives or additional points the Council should be considering?

236. This is a clean and detailed policy compared to ECO6 which is very vague trying to encompass too many options.

237. Query the assumed need for floodlighting especially in relation to dark skies. It would see appropriated the flood lighting is assumed not required unless a need can be demonstrated.

Landscape Character

Proposed Policy LAN1: Rural Environments and Landscape Character

Policy Status:	Strategic
New Policy?	No – revised CS Policy EN1
Overall Priorities:	Green to the Core

Q178. What are your views on the Council's proposed policy on rural environments and landscape character?

Q179. Are there any alternatives or additional points the Council should be considering?

- 238.** GTC9 – is far too vague about the actual landscape character features of the HWNL so should be reinforced under this policy.
- 239.** Removing the terms 'high quality historic, built and natural landscape' as seen in EN1 is not explained. Reference to the historic layout of the HWNL does not feature highly if at all throughout the draft Local Plan. Therefore, it would be beneficial to have this phrase reinstated as it is the medieval network across the HWNL which makes it so unique and need of preserving.

Proposed Policy LAN2: Trees, Woodlands and Hedgerows

Policy Status:	Non-Strategic
New Policy?	Yes
Overall Priorities:	Green to the Core

Q180. What are your views on the Council's proposed policy on trees, woodlands and hedgerows?

Q181. Are there any alternatives or additional points the Council should be considering?

- 240.** It is very positive to have a specific policy on trees, woodlands and hedgerows. However, no great weight is given to this and it is a non-strategic policy which is disappointing. No linking back to the HWNL and should be expressly determined. The tree canopy of Bexhill is mentioned but no aspirations for any other areas.
- 241.** No indication on what 'acceptable loss' would actually achieve. This is far too subjective again and in the explanatory text it outlines the NPPF para 180 c) states:
- “development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons, and a suitable compensation strategy exists.”
- This is noted in the explanatory text but to have this echoed in the main policy with clear understanding for both exceptional reason and what suitable compensation strategy there will be. Well established and veteran trees capture so much carbon. Removing these release that carbon and replacements will take decades to reach the same level of carbon capture let alone accounting for what has already been lost so trees and hedgerows should have the highest protections to stay in-situ.
- 242.** What would determine 'locally valued' trees and hedgerows? How will this be measured? BY officers or the local community and what mechanism will be used to capture this?

243. (i) The CAVAT system seems a useful tool to put a monetary value on the trees to justify their removal and give a minimal amount of funds to achieve this through financial compensation.
244. (ii) 'Net Loss' of hedgerows indicates that hedgerows can be removed as long as they are replaced elsewhere. Removing hedgerows especially well established ones in the HWNL should not be considered acceptable. No criteria around wildlife corridors or requirements to maintain these intact and no reference to the hedgerow legislation. Unclear how this is relating to policy ENV5.
245. (iii) what is acceptable loss of hedgerows and trees? No indication on the level on weight this will be given against for example looking for densities higher than the maximum on sites with eco homes as per policy LWL1 – compact development.
246. (v) indigenous trees should be a requirement at all times not 'where appropriate'. There should be a requirement that there is not a 'mono-culture' for the planting to help avoid tree/shrub loss on mass if one species becomes diseased.
247. (vi) for any long-term maintenance and management plan needs to have clear stewardship and a minimum time for this to be delivered 5-10 years minimum. It should be explicit in Parishes this should be directly linked with the Parish Councils and funds provided for the entire period to allow them or another steward group to manage those trees. A clear financial calculation to achieve this including loss of some trees to be replaced should be included. Parish Councils are permanent feature in rural areas but would need the financial support to carry this out but would ensure the trees and hedgerows are properly monitored and managed.

Proposed Policy LAN3: Dark Skies

Policy Status:	Non-Strategic
New Policy?	Yes
Overall Priorities:	Green to the Core & Live Well Locally

Q182. What are your views on the Council's proposed policy on Dark Skies?

Q183. Are there any alternatives or additional points the Council should be considering?

248. Dark skies are being misrepresented. The focus should be around reducing or preventing light pollution where possible. Too much reliance on the type of glass being used. The draft Local Plan is giving many opportunities to 'mitigate' against dark skies rather than protecting the habitat. This is significant to species such as glow worms and moths and unless development is stopped, and dark skies actually protected in key areas these 'mitigations' will still carry out significant harm and remove these protected species from the sites. Glow worms do not recognise 'mitigated' glass etc. When you read this against the Sussex Nature Recovery plan there are so few protected sites across Sussex and this policy further endangers these areas being eroded away through 'mitigation' over protection.
249. Dark skies should be strong enough to understand and protect the rural environment areas. There is little to protection on actually refusing applications therefore, rather than just mitigating it should be prevention.

- 250.** What is deemed 'necessary' light pollution. Again, the lack of clarity between the numerous policies. In a situation where a building has significant eco benefits but also significant 'glazed windows' what weighting of the eco of the building is given over the protection of dark skies.
- 251.** There should be a greater focus on protecting 'isolated' areas within the HWNL and stopping development creep outside the development boundary as this will harm the dark skies across the District. Looking at other policies such as DEV3 and ECO7 which allow development (however limited) in isolated areas and sites on the edge of settlements or ribbon developments or infilling in areas which historically have been protected dark sky areas, these sites historically have provided 'dark sky' corridors for wildlife and highlight the significant need for strategic green gaps within the countryside.
- 252.** When you pair this with the numerous policies which are allowing development outside the development boundaries and the encouragement of higher density building as well if the buildings are eco where some have huge expanses of glass this policy seems to have little or no actual benefit in protecting the dark skies.

Environmental Management

Proposed Policy ENV1: Coastal, Water and Flood Risk Management

Policy Status:	Strategic
New Policy?	Yes
Overall Priorities:	Green to the Core

Q184. What are your views on the proposed policy on water, coastal and flood risk management?

Q185. Are there any alternatives or additional points the Council should be considering?

253. It is unclear how this is relating to policy LWL 7 – Streets for All, ENV2 – Sustainable Water Surface Drainage.

254. Much stronger language needed around the protection of ‘source protection zones’ to ensure there is no impact on these vital areas.

Proposed Policy ENV2: Sustainable Surface Water Drainage

Policy Status:	Non-strategic
New Policy?	No. Updated version of DaSA Policy DEN5
Overall Priorities:	Green to the Core

Q186. What are your views on the proposed policy on sustainable drainage?

Q187. Are there any alternatives or additional points the Council should be considering?

255. There is no detail given in the water standards for buildings and surface water drainage and sewerage. Items seem to conflict and no clear guidance around important issues such as concreting vs flooding and need for porous concrete to mitigate surface water getting into and flooding the sewerage systems. There is no direct link to climate change and no adaptation measures which is a concern considering the length of time the Local Plan would be in place for.

Proposed Policy ENV3: Land Stability

Policy Status:	Non-strategic
New Policy?	No. Updated version of DaSA Policy DEN6
Overall Priorities:	Green to the Core

Q188. What are your views on the proposed policy on land stability?

Q189. Are there any alternatives or additional points the Council should be considering?

Q190. Are there areas which you consider require an area specific policy, and if so, what evidence is available?

256. Issues when there is any infilling of land as this policy is mainly looking at existing land, but consideration needs to be properly given to any land infill. Clear outlining in construction management plans on where the soil/infill is coming from. If the developer significantly changes levels through infill proper planning conditions and seen in the construction management plan.

257. Should this policy not link back to GTC3 – Construction Materials and Waste about the ensuring land stability through proper management of waste rather than the burying of it in unsuitable

places. If construction waste is used then proper compacting at the lower levels to minimise land instability for roads and open green spaces, recreational areas etc.

Proposed Policy ENV5: Habitats and Species

Policy Status:	Non-strategic
New Policy?	No, updated version of DaSA Policy DEN4
Overall Priorities:	Green to the Core

Q194. What are your views on the Council's proposed policy on sites protected for their habitats and species?

Q195. Are there any alternatives or additional points the Council should be considering?

- 258.** Needs an actual fence or physical boundary to stop 'creep' into the 15metres. There should be a landscape buffer of at least 2 to 3 metres to shield the ancient woodland from any development near an ancient woodland.
- 259.** No new access or public access should be allowed despite the close proximity of the development to the site. Ancient woodlands which do not have any public rights of ways are ancient historic biodiverse sites which should be protected at all costs.

Proposed Policy ENV7: Environmental Pollution

Policy Status:	Non-strategic
New Policy?	No, updated version of DaSA Policy DEN7
Overall Priorities:	Green to the Core & Live Well Locally

Q199. What are your views on the Council's proposed policy on environmental pollution?

Q200. Are there any alternatives or additional points the Council should be considering?

Q201. 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?

- 260.** General comment that there should be a better summary within the policy itself about each area rather than in the explanatory text to strengthen this policy. However, compared to the DEN7 policy this is a much stronger policy.

Heritage Management

Proposed Policy HER1: Heritage Management

Policy Status:	Strategic
New Policy?	No. Amended version of Core Strategy Policy EN2
Overall Priorities:	Live Well Locally

Q202. What are your views on the Council's proposed policy on heritage management?

Q203. Are there any alternatives or additional points the Council should be considering?

- 261.** Guidance offered follows that of Heritage England guidelines. The guidance now offers a green/amber/red approach to making properties more eco-friendly and especially for heating and cooling offer some practical steps to achieve this. When reviewing applications on balance the environmental benefits, costs and appearance to the property and local feedback should all be taken into account.

Proposed Policy HER2: Traditional Historic Farm Buildings

Policy Status:	Strategic
New Policy?	No. Core Strategy Policy RA4
Overall Priorities:	Live Well Locally

Q204. What are your views on the Council's proposed policy on traditional historic farm buildings?

Q205. Are there any alternatives or additional points the Council should be considering?

- 262.** Policy is worded the same as RA4 from 2015 Core Strategy and is sufficient. However, it would be useful to refer this back to policies ECO5 – Tourism Activities, Facilities and Accommodation, ECO6 – Holiday Sites and ECO8 – Agricultural Diversification. These policies also do not mention HER2 and should highlight the link between all these policies.