

Response to the Draft Local plan, including replies to the HEELA, from Catsfield Parish Council

Note to RDC. While this document refers mainly to the Draft Local Plan please treat comments on the HEELA sites in this document as comments on the HELLA supporting evidence survey.

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

Rother District will be an attractive, desirable and affordable place to live, work and visit.

Answer: Agreed, this a desirable Vision. There is however a fundamental problem with the application of this policy and other policies in the draft plan because the policies are relevant to urban areas and not to rural areas. For example, the principles of being able to walk or use public transport to access services cannot apply to rural villages other than at a very small scale. There will always be a very large percent of the Parish who are not in walking distance of services and public transport simply does not meet local needs. Large scale developments in village centres would allow more people to walk to some local services but not to most of the services needed. This will also fundamentally and negatively change the character of a Village. We see this in Hellingly where a once small village is now an urban sprawl. This cannot be accepted as a planning policy. A cap on the percentage increase in developments in Villages is needed to protect village communities from over development.

The needs of all the local community will be met.

Answer: Yes, if true but this is not true as applied ref the proposals for Catsfield. The needs of the community do not include adding 55 houses into the centre of the Village creating a more than 100% increase in housing in the village centre, on High Weald National Landscape land, with no access to sewers, with no or limited access from roadways (decreasing road safety), with no biodiversity gain, on land that regularly floods.

With an emphasis on enhanced health and wellbeing for now and into the future.

Answer: Yes, if true but this is not true as applied ref the proposals for Catsfield. There is no evidence in the plan that the health or wellbeing of residents in Catsfield will be enhanced. The plan proposes significantly less green field land, foul water flood risks (no sewer connections on the sites proposed require vast sewage tanks to be fitted), risk of death or injury from roads because of access issues. The access to facilities (Water – we already have low water pressure problems), Drainage – Flooding of the fields, roads and houses in the centre of the village happens every year) & Services (Schools, Doctors) both are in short supply – adding +100% capacity to the housing in the village centre will make these issues worse. The increasing in housing for Catsfield is higher than for other similar villages in Rother, and an overwhelming increase to the housing totals for the Village. This does not support enhanced wellbeing or health.

Bold solutions will have successfully addressed the climate and biodiversity emergencies and the housing crisis while protecting the High Weald National Landscape, our designated habitats, our heritage and our flood risk areas.

Answer: Yes, if true but this is not true as applied ref the proposals for Catsfield.

- Net zero new housing is fine, but not at this scale, it overpowers the village, our social and community structure cannot cope with development on this scale. Two of the large sites proposed will reduce biodiversity. There is biodiversity net loss by building on green fields at this scale.
- 2 of the 3 sites proposed in the HEELA are within the High Weald National Landscape. (Criteria for refusing similar sites also apply to these sites but have not been applied)
- All 3 of the sites have flood risks.

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

Overall Priority 1 – Green to the Core.

Being Green to the Core means considering the impact of all planning decisions on the climate emergency, the biodiversity crisis and the High Weald Area National Landscape.

Answer: Yes, if true but this is not true as applied ref the proposals for Catsfield. The proposed developments CAT0001 and CAT0016 are both large and within the High Weald Area National Landscape, these sites are highly valued by the local community, any development will have a significant negative impact on the environment and biodiversity. There should be an exceptional reason for allowing these sites in the HEELA, if not, and there is no exceptional reason, the policies stated here do not align with the HEELA.

Contributing to the radical reduction in carbon emissions required by national planning policy through planning for sustainable transport.

Answer: Adding housing at these scales in Catsfield will not contribute to a reduction in carbon emission from transport. All residents of the village need cars to travel for work, social needs or to simply get supplies needed for living. The local bus service cannot and does not meet this need. The flexibus does not serve Catsfield. To contribute to a reduction in carbon through transport it will be necessary to either make public transport relevant to rural areas or build more houses in towns where there are multiple services that can be accessed by public transport or by cycle or on foot. The services in Catsfield that can be accessed by public transport or on foot. (Shop, Pub, School) are used locally but represent a tiny percent of the services used by residents. Residents in the Parish of Catsfield and in the Village will still have to use cars to access almost all services and work. This policy simply cannot apply to Catsfield.

Net zero housing and renewable energy.

Answer: Agreed.

Playing a key role in the UK's nature recovery and carbon sequestration through enhancing our landscape and environmental assets.

Answer: This will not be achieved by digging up green fields, unless there is a proven net gain, which there is not in Catsfield. We should not therefore be including sites in the HEELLA that do not align with policy.

In tandem with the Climate Emergency, there is a biodiversity crisis. The Environment Act 2021 includes a target to halt the decline of nature by 2030, and mandates Biodiversity Net Gain for developments.

Answer: This will not be achieved by digging up green fields, unless there is a proven net gain, which there is not in Catsfield. We should not therefore be including sites in the HEELLA that do not align with policy.

Rother's rural landscape and coastal environment can play a key role in the nation's nature recovery. It also makes a strong contribution to carbon sequestration.

Answer: Reduce the development scale, to minimise the impact on the environment. There are brown field sites that have been rejected.

Overall Priority 2 – Live Well Locally

The Live Well Locally concept means considering, when making all planning decisions, the goal of creating: Healthy, sustainable and inclusive communities that support residents across the age spectrum in terms of housing, access to jobs, services and facilities. 'Connected and compact

neighbourhoods' in our towns with 'village clusters' in our rural locations, where people can meet most of their daily needs within a reasonable distance of their home, with the option to walk, wheel, cycle (active travel) or use public transport. New development that creates places that are not just visually appealing, but also inspire and foster a sense of belonging, identity, and shared experience.

Answer: We can create Healthy, sustainable and inclusive communities that support residents across the age spectrum ***if the required development*** does not overwhelm the existing community, and **IF** developments and investment do deliver improved Healthy, sustainable and inclusive communities. The proposals in the local plan will not achieve this aim, the scale is too high for our Village to provide for improvements across the community. The scale of development for Catsfield is far higher than for other Villages in Rother of our size. The strategic driver should be for the stated sustainability but appears to be driven by allocating the available land only to achieve a housing quota.

Answer: Access to jobs, services and facilities as priority is fine **if** its relevant. The local plan states that no jobs will be created in Catsfield by building these houses.

Anyone living here will still need to travel to a job, by car. Services and Facilities as noted above are not available locally and will still be accessed by car.

"Village Clusters" may look practical with achievable net gains on paper but where is the evidence that "clustering" is a proven strategy and not just a trending idea? The assumption is that by clustering with a town or large village in the local mapped area there will be a net gain where "where people can meet most of their daily needs within a reasonable distance of their home, with the option to walk, wheel, cycle (active travel) or use public transport". This is simply not true when applied to Catsfield. Most of the daily needs of most people in the Parish of Catsfield require the use of a car. Most of the needs of the residents in the Village of Catsfield require the use of a car. (The availability of a local Shop & Pub and School do not meet the needs of most people). Most of the shop customers arrive by Car. Most school children arrive by car, most pub users arrive by car.

Wheeling or Cycling require safe road spaces to wheel or cycle on. The roads around Catsfield are not safe. Cycling to Battle for example is dangerous, there are no cycle lanes and fast-moving traffic. Using public transport is simply not viable. (Too infrequent, only in the daytime, expensive, slow, only destinations are Battle and Bexhill) note no Flexibus service in Catsfield. The number of passengers (other than the school bus) using local transport will show how unpractical this option is.

2.11 As a predominantly rural district, where there is a high reliance on the private car, decarbonisation of our transport emissions will be assisted if there is a pattern of development which makes it quicker and easier to travel by sustainable means; efficient Rother District Local Plan 2020 – 2040 Regulation 18 Version 23 Vision, Overall Priorities and Objectives use of infrastructure networks; and more public and active travel.

Answer: (See answer above)

Live well locally is fine ambition but the local plan will not deliver this for Catsfield, and the stated goal does not support the need for development that will destroy our environment without upside gains.

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

2.13 Key Planning Issues

Delivering carbon reduction and adaptation to climate change, and responding to the locally declared 'Climate Emergency'.

- *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.

Answer: Fine if true but not true for Catsfield. We need more affordable housing in small plots not new housing estates that do not fit with the character of our village and of a scale that will overwhelm our community. We could build market value housing in small scale developments and use small exception sites to build high quality affordable housing in partnership with the Parish Council. This would meet the need for housing, be deliverable and meet the carbon reduction ambition.

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.

Answer: Fine if true but not true for Catsfield. Where in the local plan will I find this support and access to jobs?

Conserving and enhancing the significant landscape and environmental quality across the district, particularly the High Weald National Landscape (AONB).

Answer: The local plan for Catsfield does the exact opposite, we lose two important and valued green spaces and gain over scaled housing estates that risk polluting the water tables and destroying local wildlife!

Delivering district-wide and neighbourhood infrastructure to support growth and strengthening the sustainability of settlements and communities.

Answer: Fine if true but not true for Catsfield. Where in the local plan will I find how this will be delivered? New Schools? New access to medical care? Capacity increasing for water supply and drainage? Improved power supply? Improved fast broadband?

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.

Answer: Fine if true but not true for Catsfield. Where in the local plan will I find how this will be planned How can the scales of the increase in housing in our village be sustainable?

Planning for an ageing population, responding to the needs for adaptable homes and a range of accommodation needs.

Answer: If sustainable development in our village achieves this, then all good.

Providing better facilities for sports, leisure, culture and tourism to meet the needs of the local community and those visiting the area.

Answer: Where in the local plan will I find how this will be planned & delivered? Sounds good but make no sense for our village and other villages. We still need to travel to these if they are available, or we could use CiL funding (our own plus contributions from the central pot) to improve our village facilities.

Managing uncertainties and contingency planning, including long-term climate change resilience.

Answer: OK.

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

Answer: The 10 Objectives are laudable. The challenge as always is how to implement plans to achieve these objectives. Achieving such aims in larger communities or Towns, particularly for Hasting and Bexhill is probably directly relevant and these objectives could easily apply where scales and connectivity between larger groups of people exist, but for smaller rural communities and villages

much of this is just corporate gobbledegook, even if well intentioned. If applied fairly and with context to smaller communities these objectives would be fine but given the draft HEELA sites in the plan for Catsfield, it is clear these objectives have not been considered in context and will be made to fit, even where it is clear they do not. Example

Objective 2 - The words do not fit the reality for our community. The HEELA has allocated large green plots in the centre of a village, WHNL, doubling the housing numbers and expect a net gain? This is directly the opposite of the stated objective.

Objective 5 - There is inconsistency in the notes to the sites that have been rejected and those agreed or under consideration for Catsfield. Some areas appear to have been agreed or are being considered even though they don't fit with these objectives.

Objective 8 - There is no effective local transport that serves Villages. If you count the number of passenger journeys by any transport means and the number by public transport this will give an indication of the practical use of public transport. This is not to say increasing public transport is a bad idea, but it does not work for villages at a scale that can be used as a supporting factor or strategy to support housing development in villages.

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

Answer: Objective 4 needs to be re-drafted to include "limiting new sustainable developments so that these do not overwhelm existing communities"

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

Answer: Broadly agree.

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

Answer: It is important. Broadly agree.

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

Answer: See Q5 and opening comments about the policies not being relevant to rural areas.

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

Answer: No comment. Not enough info to understand what this means in practical terms.

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

Answer: No comment

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

Answer: No comment. We don't have sufficient knowledge to comment.

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

Answer: Agree.

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

Answer: No comment

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

Answer: Agree these are good policies.

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

Answer: Agree these are good policies.

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

Answer: No comment.

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

Answer: The Tree Warden agrees with the principle, but the delay of a year before any action document is prepared is disappointing. A Conservation Officer should oversee the report to be made for Rother by ESCC to ensure that it is perfectly applicable to Rother area. More than 'due regard' must then be applied to all Applications to ensure the aims of the Environment Act 2021 are addressed.

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

Answer: All Applications should consider the proximity of Natura 2000 sites, particularly RAMSARS and SACs (e.g. in Pevensey) and as Rother is a Responsible Body must ensure that an Appropriate Assessment is prepared for any site within 15-20 km of any site - this being the distance that Natural England as being within the 'proximity'.

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

Answer: BNG is a good idea which flows from ideas in the Environment Act 2021, although the software is still not fit for purpose. Natural England have not yet produced templates for some kinds of development, such as solar farms. Rother need to list all exceptions unambiguously to BNG - working on what are already exceptions.

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

Answer: Yes, agree 20%.

Q24. Are there any alternatives or additional points the Council should be considering?

Answer: Rother should never permit building in any permanent TPO that they have designated. This is contrary to the whole effort of protecting nature.

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

Answer: Follow what the High Weald propose in their latest Management Plan.

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

Answer: *All development within or affecting the setting of the High Weald National Landscape (AONB) shall conserve and enhance its distinctive landscape character, ecological features, settlement pattern and scenic beauty, having particular regard to the impacts on its character components, as set out in the latest version of the High Weald AONB Management Plan. Development within the High Weald National Landscape should be small-scale, in keeping with the landscape and settlement pattern, and designed in a way that reflects its nationally designated status as landscape of the highest quality, following the guidance in the High Weald AONB Housing Design Guide and Colour Study. Major development should not take place in the AONB save in exceptional circumstances as outlined at paragraph 183 of the NPPF.*

Answer: Ref sites allocated in the HEELA.

"Impact on the High Weald AONB. Catsfield is a very attractive and highly desirable place to live within an area designated for landscape beauty. This landscape is of national importance and should be preserved. Green open spaces incorporating trees, natural boundaries, views and both managed and unmanaged open land are intrinsic to the qualities of the AONB. The overdevelopment of these sites and the substantial growth proposed to the village will have an irrevocable impact on the landscape. The sites are not sheltered, screened or visually mitigated. The sites if developed will constitute a fundamental change to the character and appearance of the village and the wider area. The 2014 Core

Strategy makes it a key vision principle that essentially rural areas falling mainly within the High Weald AONB retain their essential character, and the new draft local plan supports this.

There is a strong presumption in the NPPF that areas such as the AONB are important to be protected and should shape the extent and scale of development. The Core Strategy recognises the restriction but states that sustainable growth can happen but should not happen without harming the individual character and amenities. The construction of 35 and 20 dwellings on the respective sites in the HEELA involving the removal of several trees and the encroachment into the setting of listed buildings is a significant impact on the character and (visual) amenities of Catsfield. Development on these sites fails to recognise the strong steer given by policy DEN2 in the current Local Plan which states that **development within the High Weald AONB should be small scale and in keeping with the landscape and settlement pattern; major development (greater than 10 homes) will be inappropriate except in exceptional circumstances.** The new draft plan also supports this. In determining the site allocations in the Current Local Plan, CAT0001 should not have been entertained at all and both CAT0001 and CAT0016 do not align with the policies in the new draft plan.

Catsfield is a village with a very linear pattern of development with a single row of properties facing onto three or four key streets such as Church Lane/Church Road, Skinners Lane and The Green. There is very little intensification and dense urbanisation. A deeply projecting and very large sites such as CAT0001 and CAT0016 would be beyond the existing urban grain and would be out of character. Furthermore, this incongruous form of development would be highly visible and harmful to the qualities of the AONB by being visible from within the AONB.

Policy approaches to protect and enhance landscape character in the High Weald National Landscape

3.63 National policy states that the highest status of protection should be afforded to the landscape and scenic beauty of Areas of Outstanding Natural Beauty (AONB) and great weight given to their conservation and enhancement. The NPPF specifically states that the scale and extent of development within an AONB should be limited and advises that planning **applications for major development should be refused other than in exceptional circumstances.** Adding CAT0001 and CAT0016 as suitable site in the draft local plan cannot be acceptable because and development here is contra to the NPPF unless exceptional circumstance and be identified. It sets out that proposals for major development should include an assessment of the need for the development, the potential to meet it outside the protected landscape or in another way and any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated. The site allocation ignores these principles.

3.64 *The Council's proposed development strategy will identify in principle the types of development and locations that will be prioritised for growth, with the conclusion of the HELAA and further landscape assessment work helping to determine the amount of development that is capable of being accommodated satisfactorily and sustainably in and around the towns and villages within the High Weald NL. To support the integrity and importance of the High Weald NL and conserve and enhance its important landscape and scenic beauty the following policy approaches have been explored:*

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

Answer: These risks overdeveloping rural areas.

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

Answer: These risks overdeveloping rural areas

Q29. Are there any alternatives or additional points the Council should be considering?

Answer: Focus on small developments in small villages.

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

Answer: Broadly not relevant to rural areas.

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

Answer: Fund the creation of capacity in local services before agreeing sites that will increase housing to a level that exceeds the services capacity.

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?

Answer. This is not really relevant to a rural area, it applies more to urban areas. As noted in previous comments 20 minute walking in a rural parish won't get you to most services. 4.17 The connected communities concept similarly cannot apply. 4.18 Parishes already manage Village Halls and similar venues as community hubs, so the policy is fine but should not be used to support housing developments. *Live well locally is a variation of the 20-minute neighbourhood concept that adapts to Rother's local context, including its dispersed settlement pattern. The 20-minute neighbourhood concept suggests that people of all ages and abilities should be able to reach their daily needs (such as housing, work, food, health, education and culture and leisure) within a 20-minute walk or bike ride, to reduce reliance on the car. This concept is also known as complete, compact, and connected communities.* **Answer** as noted earlier in this document this policy applies to towns but not to Rural Villages that do not have effective and safe walking routes or practical public transport. 4.17 *Live well locally seeks to build upon existing transport networks (where they exist), such as bus and rail services, demand responsive solutions, social care, education, and community transport. It promotes new and emerging modes such as community car and bike share, offering alternatives to car ownership.* **Answer** (see previous answer)

4.18 *Many communities in Rother have community and church halls, shops, village squares, healthcare facilities, pubs, and other amenities. These can all help provide focus for the live well locally community concept by becoming 'neighbourhood activity centres' and/or 'mobility hubs', providing information services and infrastructure as well as wider community-based services in an indoor meeting place.*

Answer. These facilities exist already and do already within the limited funding and investment available provide "Living Well" options in village. If the new plan will divert funding for improvements from towns into Villages (Much of the Capital investment in Rother is Bexhill focussed, while only 50% of the population live in Bexhill) this policy will work. If it means we will have to travel to the nearest large cluster town it wont work. If either is used as an excuse to build large developments in villages that overwhelm the existing communities the plan will only be seen as a sham.

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

Answer: see prior answers

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

Answer: No comment

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

Answer: This does not appear to comply with major developments proposed in Catsfield. See prior on answers on walking & public transport.

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

Answer: See prior on answers on walking & public transport.

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

Answer: This does not appear to be relevant with major developments proposed in Catsfield.

Q41. Specifically, what are your views on using the considerations in Building for a Healthy Life and Streets for a Healthy Life as a framework for assessing residential development?

Answer: This does not appear to comply with major developments proposed in Catsfield.

Q44. Specifically, what are your views on prioritising solar orientation and form factor when designing new developments?

Answer. The proposed sites layout and orientation are very different to the linear orientation of all other housing in the village and will not comply with this policy.

Q53. Are there any other development options that the Council should consider as part of its Local Plan?

Answer: 5.11 sustainable transport as noted earlier is not practical.

Answer: 5.15 Clusters as a principle does not fit with the needs of the villages. There is no evidence that this principle works in practice.

Answer: 5.5 these criteria do not fit with the scale of development planned for Catsfield. No Jobs. No change to access for services. The need to travel will not decrease.

The background paper concludes that the most appropriate spatial development options to take forward as Rother's proposed development strategy is a combination of the following options:

- *Brownfield intensification and redevelopment within sustainable settlements (Option reference SDO6).*
- *Bexhill greenfield growth on the northern and western edges of the built up area of Bexhill to create new compact, connected communities (SDO3A)*
- *Hastings Fringes urban growth (SDO5)*
- *Radial settlement network connected to Bexhill and Hastings (SDO2)*
- ***Village clusters centred around Rye and Battle (SDO1)***
- *Sustainable settlement growth (SDO4) with longer term, a focus on the A21 Corridor (SDO10)*

Answer 5.15 Clusters as a principle does not fit with the needs of the villages. There is no evidence that this principle works in practice, or aligns with the Green to the Core or Live well live better ambition for the local plan.

Q62. What are your views on the vision for Battle and surrounding settlements?

Answer: The proposed development sites and scales does negatively impact in the HWNL. Small level of growth can work but the scales proposed (100%+) will overwhelm the village and not meet the stated objectives of the vision.

Q63. What are your views on the distribution and opportunities for growth in settlements within the sub-area in figures 21, 22 & 23?

Answer: Fig 21 & 22. Several polices are driven by employment growth to support development, but the only employment growth potential is within Battle. Does our cluster with Battle help Catsfield, and why such a high allocation (60), only Westfield has higher targets. Appropriate development in Villages in this cluster is fine, but the balance and scale of development across all villages must be fair and not substantially impact the existing communities. A cap of the size of developments relative the local area

(e.g where that will be built rather than relative to the whole parish) is needed. Anything over 20% would be difficult to assimilate.

Q64. What are your views on the potential sites identified in the draft HELAA that could accommodate more growth in Battle and surrounding settlements?

Answer: The assumption is that the villages in the cluster will benefit from being able to access the central town (Battle) for services. This assumption needs to be challenged and have supporting evidence. The scale of development if it is to enable clusters to work needs to apply equitably to all villages in the cluster but that is not the case in the sites identified in the HELAA. Why is Catsfield allocated a high quota of development, while other villages have none? Why can we not have more smaller scale developments spread over the area to achieve the same growth and meet the objectives of clustering? Not all residents want to live in the village centre, but they should all be considered to benefit from the planning objectives. This plan over focusses on the village centre, without delivering the stated benefits of ecology, living better, transport etc. A wider spread of smaller scale developments within the cluster area would be better place to deliver benefits without damaging the HWNL and have the same impact on the objectives of employment and transport as larger scale development without overwhelming any existing settlement. In what scale and context do the villages depend on Battle for Key services? What are these key services? Where is the data to support this statement? How will the proposed developments deliver this? Smaller and sensitive development yes, but the proposals are not small of sensitive for Catsfield.

Questions 65-71 refer to areas of Rother that are not relevant to Catsfield.

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

Answer: The population of parishes is not all centred on villages. Many residents live in areas beyond the villages but are not linked to farming and agriculture. It is a mistake to develop policies that will urbanise rural village centres. The vision needs to be for the whole of the Parish and not focussed on developing village centres with the mistaken assumption that more housing centrally will enable lower use of cars, increase use of public transport or local walking to services.

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

Answer: Smaller developments with a wider spread. It is OK to develop new smaller scale housing outside of village centres. It's how rural life works. Large scale development is ruining rural life. Use exception planning to develop affordable housing on low value agricultural land.

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

Answer: Development boundaries are fine but in the current local plan the boundary was changed to allow development of one of the proposed sites in the village CAT0001. If the boundaries are changed to suit the plan what is the point of setting boundaries? A key objective of boundaries is to protect surrounding countryside, but small scale development outside of the boundaries and not in village centres will not necessarily have a negative impact. The key is appropriate development where it fits to suit the needs of all people, not the shoehorning of larger scale developments into village centres either within current boundaries or by changing boundaries to fit the plan.

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%?

Answer: The plan recognises that smaller sites do form an important part of the housing supply, and that these sites will often be identified via Neighbourhood Plans and that a significant percent of the planned house building will be from smaller sites. However, a large number of sites built over the past years in Catsfield of less than five houses do not count toward the targeted number of houses to be built. Catsfield has a higher than average number of these windfall sites but still has a higher than

average target for building on larger sites. This disadvantages Catsfield or other villages by not recognising these smaller developments, unless they are part of a neighbourhood plan. This policy is therefore not equitable and does need to be adjusted to recognise parishes with high windfall percentages being built and to reduce (or not allocate land in the plan) targets set to recognise total developments achieved. So yes, target more than 10% and do so by recognising where local building on smaller sites has already contributed to the targets and can continue to do so, even when there is no NP.

Q96& 97 are not relevant.

Q106-108 not relevant.

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?

Answer: Yes, there should be clear evidence that capacity is in place before developments can be approved.

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

Answer: It should not be possible to approve new development with better access and speeds to internet than for other local existing developments

Q113. Are there any alternatives or additional points the Council should be considering?

Answer: It should not be possible to approve new development with better access and speeds to internet than for other local existing developments

Q114-124 Affordable Housing and exception sites.

Answer: Exception sites could be an option for delivering small scale affordable housing in partnership with Parish Councils. **It is important that Parish Councils retain the veto on development of exception sites.**

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

Answer: This is a vague question. We need both and the plan needs to deliver both.

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

Answer: Yes, agree NP may include affordable only developments

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

Answer: Refer to HOU5 below:

8.51 Proposed Policy HOU5 takes forward Policy DHG2 of the DaSA Local Plan with some minor changes. The former requirement for schemes to be supported or initiated by the Parish Council is removed and replaced with criteria (iv), a requirement to demonstrate that there has been meaningful community engagement throughout the development process and the benefits of the development to the village/parish are clearly defined. This change will enable rural exception sites to be brought forward by a wider range of groups and individuals, supporting the delivery of more affordable homes in rural locations where these cannot be accommodated within development boundaries.

Answer: We **do not agree** with criteria (iv) in item 8.51 the Parish Council represents the wishes of local people. That is a democratic principle. Allowing other groups or individuals to override the views of the locally elected Council is not acceptable.

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?

Answer: Yes, broadly agree with this policy.

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)?

Answer: No answer

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

Answer: Yes, broadly agree.

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

Answer: New development should be required to fit in with existing housing. For example, we have seen new additions in streets that “light up like Xmas trees” with external lighting, compared to very limited external lights on existing houses. Streets go from Dark to Light, even if they stay within the limits of dark sky definitions. This needs tighter control on brightness.

Any development requiring significant new street lighting should not be allowed. Again, the reference is to match into the existing light levels.

Addendum: Comments from Dr John Feltwell Tree Warden to Catsfield Parish Council.

Comments from the Tree Warden, Dr John Feltwell, on the Local Plan

1. There is always a need to respect the AONL in the parish, i.e. to resist all building, unless it is replacement.
2. All trees in the parish, whether in the AONL or outside have equal importance must be conserved at all times.
3. The Management Plan for the AONL (inc its pending update), from the AONL Unit, must be followed at all times.
4. The Catsfield Biodiversity Audit (116pp) (copy on CPC website) must be consulted on all developments.
5. The Village NP must be consulted at all times, when complete.
6. All TPOs (Tree Preservation Orders) in the parish must be protected from development.
7. The Normanhurst TPO is especially vulnerable to adverse impact from development as it is a finite natural asset for the community.
8. The 1066 Country Walk that goes through the centre of Normanhurst must be conserved from adverse impact.
9. The Brassey Estate (Normanhurst) must be shown on Rother on-line maps as an historic arboretum with regional and national important specimens.
10. The CAVAT valuations of the trees through the village, and in Normanhurst represent a community value of the natural resource of the village. (details in the Bio Audit). These need to be appreciated in planning, and actively conserved.
11. Development in any of the parish's TPOs must be rigorously opposed. **This is important, as Rother permitted destruction of a TPO to make way for four houses opposite The Plough in Crowhurst in 2023. NOTE. Planning trumps TPOs.**
12. Other have been asked to provide Local Green Space (LGS) status to the Normanhurst TPO. This needs to be pursued with Rother for a definitive answer. **See Letter 14 to Rother date 23 June 2023 attached.**

13. The Brooks should also be registered as a LGS as it represents the centre of the village that was originally settled.

Addendum: Comments from resident on the Church Road, Catsfield section on the HEELA

1. The AONL infill next to St Kitts, opposite, was refused and confirmed on appeal in 2021. Most elements of that decision are relevant here.
2. Loss of virtually all the Ancient Hedgerow to achieve visibility splay. A large gap for access road and pavement needed anyway so any replanting would be severely compromised.
3. Loss of 'green' street scene where the main village is gapped to the separated school/Chequers Farm area – this was highlighted in the St. Kitts appeal decision.
4. Contravenes Policy LAN2.
5. The site is on the Surface Water Flood Map, including the rear ditch and Church Road itself.
6. The whole field is covered in a marsh grass, confirming that it is saturated during the winter.
7. Statutory Protection Zones to ditch, cross-site water supply and foul sewer reduce site depth to a maximum of approximately 19m, which would have to include road, parking, house and 10m rear garden plus, possibly, the replacement hedgerow. Major mains water pipe crosses the centre of the site across the AONL next to St. Kitts. NO gardens allowed on ditch protection in particular.
8. No pavements and traffic conditions unfavourable. Speeding day & night and school time parking in particular.
9. Loss of Wildlife Corridor between The Brooks and AONL. (Ref: Dr John Feltwell)
10. ESCC Landscape Officer highlighted the need to retain the visual link between The Brooks and the AONL. This development would lose it completely.
11. Loss of amenity to adjoining residents. Green access gap in Skinners Lane far too narrow.
12. No affordable housing as site under sized.
13. Impact on Pear Tree Cottage (adjacent) and the former Methodist Church (nearby) as Listed Buildings?
14. Loss of existing access to The Brooks field