

Representations

Respondent Details			Agent Details (if applicable)		Part of the Salehurst & Robertsbridge Neighbourhood				Comment Full	Indicated a specific reference to participate in oral examination	Requests to be notified when the council resolves to 'make' the Robertsbridge and Salehurst
Respondent Details	Respondent Name 3982	Organisation (if applicable)	Agent Name	Organisation (if applicable)	Document (Support/Object/Comment)	Policy No.	Paragraph No.	Page No.			
ROB/R16/2017/1	Mrs Anne Wells	n/a	N/a	N/a	Support	n/a			Having read through the Neighbourhood Plan in its entirety I find I fully support all of its contents knowing how fastidiously the authors of the plan consulted with the community at every stage. I feel it reflects the result of residents' representations and that if adopted it will be the best way forward for this village where I have lived for over 40 years.		
ROB/R16/2017/2	Mr Jonathan Vine-Hall	n/a	N/a	N/a	Support	H03 & EN2			I support the whole of the neighbourhood plan I specifically support the mill site in policy H03 I specifically support the local green spaces identified in policy EN2		
ROB/R16/2017/3	Devine Homes	n/a	Mr Howard Courtley	Courtley Planning Consultants Ltd	Object	H03 & EN2 SEA			Please see attached submissions which can be viewed here: Robertsbridge Illustrative Layout (http://www.rother.gov.uk/CHttpHandler.ashx?id=28312) Robertsbridge (http://www.rother.gov.uk/CHttpHandler.ashx?id=28313) STRATEGIC ENVIRONMENTAL ASSESSMENT (http://www.rother.gov.uk/CHttpHandler.ashx?id=28314) SALEHURST & ROBERTSBRIDGE NP (http://www.rother.gov.uk/CHttpHandler.ashx?id=28310) Transport Statement - Final 2015 (1) (http://www.rother.gov.uk/CHttpHandler.ashx?id=28315)	yes	yes
ROB/R16/2017/4	Mrs Carol Hodgson	Sedlescombe Parish Council	N/a	N/a	Support	H03 & EN2			1. Sedlescombe Parish Council supports the whole of the Salehurst and Robertsbridge Neighbourhood plan 2. Sedlescombe Parish Council specifically support the local green spaces identified in poly EN2 3. Sedlescombe Parish Council specifically support the mill site in policy H03		
ROB/R16/2017/5	Kirsten Williamson	Southern Water	n/a	n/a	Comment	H03 & EN2			Southern Water notes the amendments made to policies H03 and IN3 in respect of our previous representations, and the inclusion of a reference to Utility Infrastructure in policy EN2. We have no further comments to make in respect of the Plan at this time. We would wish to be kept informed of the progress of the Plan towards being 'made' and are happy to provide further information in respect of our previous representations if requested by the Examiner.		
ROB/R16/2017/6	Dionne Herelle	BT	N/a	N/a	Comment	n/a			I write in response to your letter dated 10 February regarding the above and confirm that I have buildings owned or occupied by BT or Telereal Trillium within the area you have indicated, in particular Robertsbridge Automatic Telephone Exchange (ATE), George Hill, Robertsbridge TN32 5AX and Staplecross UAX. I would therefore appreciate communications/copy information regarding progress in and around these sites as they may be affected. Please be aware that this advice does not extend to BT's telecommunications apparatus located in the public highway or under private land, nor does it include BT's deep level tunnels. To check the location of BT's network, enquiries should be made direct to the Open reach Maps by email service which can be found at the following URL: https://www.ref04.openreach.co.uk/orpg/home/contactus/avoidingnetworkdamage/avoidingnwdamage.do		
ROB/R16/2017/7	Mr Richard Hedger	n/a	n/a	N/a	Support	H03			I support all of the chosen sites. The Mill Site should be used as it is a brown field site which has stood empty for 12 years. The Heathfield Garden site, whilst being a greenfield site has not supported any agricultural activity since the bypass was built.		yes
ROB/R16/2017/8	Mrs Sheila Rogers	n/a	N/a	N/a	Support	Full Plan			The Mill Site - a brown field site should be used to develop necessary housing. I support the Policy requiring developers to replace parkingspaces - Robertsbridge has a parking issue already.		
ROB/R16/2017/9	Miss Muriel Ambler	n/a	N/a	N/a	Comment	behind Culver Well, Station Road			Station Road is already very busy with traffic throughout the day. Any more traffic will make it even more dangerous for children than it already is. It is also surrounded by a serious flooding problem. The road is also very badly damaged and getting worse!		
ROB/R16/2017/10	Ms Muriel Webster	n/a	N/a	N/a	Support	EC4		p/26	It is very important that the premises of the Youth Club are retained - a great asset to the village.		
ROB/R16/2017/11	Miss Karen Rees	n/a	N/a	N/a	Support and Comment	H03			I own and manage a holiday cottage in the village. I bought here as it is a thriving and characterful village and it has proved successful. Thus I wish this balance to remain, a village with life, activities and heritage but to manage any development avoiding any undermining of the rural and historical nature of the village. I accept that there needs to be development of housing. After careful consideration I agree with policy HO3 the allocations namely Mill site, Heathfield Gardens and Vicarage*. With regard to the latter* this would directly affect my business and needs very careful access arrangements as Fair Lane is very narrow and already congested.		yes
ROB/R16/2017/12	Mrs Gillian Stokoe	n/a	N/a	N/a	Support	Full Plan			Approve the Neighbourhood Plan		
ROB/R16/2017/13	Mr R S Clymo	n/a	N/a	N/a	Support	Full Plan			A welcome and well-prepared plan		yes
ROB/R16/2017/13a	Mr R S Clymo	n/a	N/a	N/a	Comment	IN7		p48	The word 'tandem' is Latin and means 'one after the other'. It is wrongly used here: the context suggests that the NP means 'at the same time' or 'in parallel'. The least you can say is that 'tandem' is ambiguous. This is not a trivial mistake: it will delight developers. Refer to the OED.	yes	yes
ROB/R16/2017/13b	Mr R S Clymo	n/a	N/a	N/a	Object	EN2		p31	'Local Green Space Designation' "Proposals for any development on the land will be resisted..." (1) Sedlescombe, with a NP complete but not formally 'made' had a decision about land use over-ridden by RDC Planning. (2) Newick had a 'made' NP, but it was over-ridden by a Planning Inspector (on appeal) who allowed 50 houses to be built on an area the NP did not designate for housing. 'Will be resisted' is too feeble. Something like "No proposal to building land not designated is this NP will be permitted".		yes
ROB/R16/2017/13c	Mr R S Clymo	n/a	N/a	N/a	Comment	H02		p37	Housing requirement' 'Additional allocations will only be made if the identified housing sites do not proceed. What does this mean? If planning permission has been given then it is up to the grantee to build. What does 'not proceed' mean? This looks (to me) like another developer's back door.		yes
ROB/R16/2017/14	Mr Michael Hennessey	n/a	N/a	N/a	Support	Full Plan			Generally I agree with the whole development, especially the conversion and redevelopment of the Mill Site. One major aspect for all the sites is the provision of ample car parking space for each unit.	yes	yes
ROB/R16/2017/15	Miss Karen Rees	n/a	N/a	N/a	Comment	Tourism Strategy			I own and manage a holiday cottage in the village, a successful business due to the vibrancy and historic nature of the village. My cottage has been designated by Visit England 'walker friendly' so I would definitely support an application to be a 'Walkers are Welcome' village, but public transport would need to be improved as would signage. All year round events such as the programme developed by Robertsbridge Arts Partnership and a vibrant programme of events at the Village Hall and markets are better than one-off larger events such as the such as the idea of developing something unique and specific.		
ROB/R16/2017/16	Miss Susan Stokoe	n/a	N/a	N/a	Support	Full Plan			I have taken a great interest in this plan and attended several exhibitions for it. I believe it to have been thoroughly and professionally developed and would like to add my support for it, and the best future for Robertsbridge.		yes
ROB/R16/2017/17	Ms Kathryn Bell	n/a	N/a	N/a	Support	Site Assessment Document.			This appears to be a fair, systematic review of the pros and cons of each site. I disagree with one point: Mill Site is rated 'could cause minor increase in congestion on one of the main thoroughfares. I think this should be 'could significantly increase'		
ROB/R16/2017/17a	Ms Kathryn Bell	n/a	N/a	N/a	Object	EN5			Too toothless words such as 'effective', 'minimising', 'take into account' are all hard to enforce (as often relative and subjective). This needs to refer to some suitable benchmark for environmental and sustainability standards.		
ROB/R16/2017/17b	Ms Kathryn Bell	n/a	N/a	N/a	Comment	3.3.9 (Environment character appraisal)			Re: Salehurst "The only negative characteristic ..., area for enhancement. The consultants seem to have applied standard town planning standard to a hamlet centre - completely inappropriate. Would knocking down some listed houses to make parking space be an enhancement? Clearly not.		
ROB/R16/2017/17c	Ms Kathryn Bell	n/a	N/a	N/a	Comment	H04 + Character Assessment			This does nothing to protect existing homeowners from backyard development which affects their enjoyment of their homes and gardens, because of noise and visual impact. The character assessments would only prevent extremes, such as blocks of flats. The character assessment for Upper Langham Road is inaccurate, partly because 3 such separate areas have been combined. The phrase 'the area is not very pedestrian friendly due to speeding cars and lack of pavements' applies to Brightling Road but not Upper Langhorn Road, which is well used by walkers, dog walkers, school children and kids playing on bikes, all of whom would be affected by increased traffic.		
ROB/R16/2017/17d	Ms Kathryn Bell	n/a	N/a	N/a	Support	Full Plan			Overall I support the plan, just with the reservations I have commented on		

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ROB/R16/2017/18	Mr John Maltman	n/a	N/a	N/a	Object	SRNDP EN8		p35 and as expanded in Schedule 3, p67-8 and as evaluated on p70 (with specific reference to Butts Cottage)	Schedule 3, p66 'Local Lists of buildings and other structures' states the list must be regarded as provisional since properties will be subject to deletion, research, amendment etc. I wish my property to be deleted from the list. The SRNDP have acquired a photo of the front of the cottage. It had to ascend a flight of 12 steps in order to do so, because the cottage is set well above the lane, and cannot be seen from it, or indeed anywhere else, since it is surrounded by farm land and separated from the Old Vicarage by a thick high hedge. Certainly the cottage cannot "contribute to the parish's distinctiveness" or embrace its "sense of community" because no one can see it. A building of some description has long existed on this site but the present one, rear view attached, bears no relationship to any "historic building". Its appearance and the dichotomy between the back and front which also contains an architecturally anomalous bow window, make it entirely unsuitable for even local listing. I therefore repeat my request that it be withdrawn from the list. Photographs were supplied which can be viewed here: http://www.rother.gov.uk/CHttpHandler.ashx?id=28217		
ROB/R16/2017/19	Mr Neil Barden	Robertsbridge Community Association	N/a	N/a	Support	Robertsbridge Hall			We support the concept of the village and lands remaining as it now is. The Hall is a very important asset to the village people. All surrounding grounds are used ie allotment, football field, and the immediate grounds are necessary for hirers of the Hall for garden shows, boot sales and parking and its grounds and Hall are in constant use by village people. Large parts of the grounds are subject to flooding.	yes	yes
ROB/R16/2017/20	Mrs Amanda Fellowes	Robertsbridge Children's Services	N/a	N/a	Support	ED1			The Plan supports provision for school places for every child in Salehurst & Robertsbridge in whichever of Robertsbridge Community College (RCC), Salehurst C of E Primary School (SPS) or Robertsbridge Children's Services (RCS). Any housing development will only be permitted if it can be demonstrated that either the expected child yield would not result in the Schools exceeding the maximum number of children permitted on its roll or that appropriate modifications and/or extension to the School can be delivered at the developer's expense. We very much support this policy as RCS will not have the capacity to provide sufficient places without developer funding of additional premises.	yes	yes
ROB/R16/2017/20a	Mrs Amanda Fellowes	Robertsbridge Children's Services	N/a	N/a	Comment	ED1	3.2.1	30	Robertsbridge Children's Services is a charity providing pre-school childcare from 8am -5.30pm for 51 weeks of the year. We cater for children from 0 to 5 years old. We have a waiting list of 15 children and have had to turn many families away due to being at full capacity. In addition, we are unable to offer the next two academic years due to the requirements of our existing families, alongside the introduction of the 30 hours of government-funded childcare being introduced from September this year. We are at full capacity, having recently extended our baby room. This, in turn, has increased the number of children moving through the pre-school. Being the only childcare provider in the village, already turning families away who need our services, we are concerned that further housing development is only going to add to the problems of families being unable to access local pre-school without extending our facilities. The site that we occupy has little room for us to expand and any further loss of green space in this location would be resisted. We are keen to ensure that the need for childcare places is met and obtain developer contributions for a new build on the sites allocated for development. We have also approached the Parish Council as we are aware the Neighbourhood Plan is in its final stages. RCS has been graded by Ofsted as 'Outstanding' at every inspection, 3 times in the last ten years since we opened on our current site. If you would like to see more about what we do, please view our website: www.robertsbridgechildrensservices.co.uk	yes	yes
ROB/R16/2017/21	Mr George Chichester	The Mountfield Estate	Mr Paul Carnell	Struttandparker.com	Support HO3; Object to Schedule 4 (re trees at Heathfield Gardens)	HO3, Schedule 4 (Local list of trees)			Strutt and Parker represents the Mountfield Estate, one of the land owners of the Heathfield Gardens site, allocated for residential development in Policy HO3. We have made previous representations to the Neighbourhood Plan process by letter dated 7th November 2016 and 2nd December 2016. As landowners, the Mountfield Estate reiterates its continued support for the allocation of Heathfield gardens under Policy HO3 for 40 residential dwellings, and will continue to work with the neighbouring landowner to bring the site forward for development following adoption of the Neighbourhood Plan. We previously commented on the criteria in policy HO3 in our letter of November 2016 and do not wish to add further to these comments. Our letter of December 2016 commented on Schedule 4 of the plan and the proposed local list of trees. We note that the trees on the Heathfield Garden Site (group G7) continue to be in the Schedule. We do not consider that robust evidence has been provided to demonstrate the value of this group of trees. We do not consider that these trees merit protection through inclusion in the Neighbourhood Plan, therefore our comments of December 2016 remain valid.		
ROB/R16/2017/22	Mr Chris Flavin	East Sussex County Council	N/a	N/a	Object	IN1			Policy IN1 – Parking provision Policy IN1 requires housing development to provide a minimum of one parking space per bedroom. Although the supporting text for this policy references a number of key pieces of evidence, which includes the ESCC parking standards, it is not clear how this evidence has been used to arrive at Policy IN1. This is particularly the case given that the approach advocated by Policy IN1 differs to that as set out in the ESCC parking standards. It is recommended that instead of adopting an arbitrary localised standard that the ESCC car parking demand calculator approach is adopted. This approach takes into account local conditions and replaced a blanket standard approach. The car parking demand calculator uses existing ward car ownership data as an important indicator and takes account of the specific characteristics and demands of occupants of houses and flats of different sizes in the area within which a proposed development lies. This approach is therefore much better than the previous blanket standard approach. It is recommended that the proposed Policy IN1 is removed and that the Plan instead only makes reference to the need for development to comply with the ESCC parking calculator and the ESCC 'Guidance for parking at new residential development'. The calculator and the 'Guidance for parking at new residential development' can be accessed on the ESCC website through the following link: http://www.eastsussex.gov.uk/environment/planning/applications/developmentcontrol/tdc-planning-apps.htm		yes
ROB/R16/2017/22a	Mr Chris Flavin	East Sussex County Council	N/a	N/a	Object	ED1			Policy ED1 – Education provision We welcome that the Plan has incorporated our suggested changes to the policy's supporting text which we made at the previous Pre-submission consultation stage. Policy ED1 however remains unclear and contradicts the revised supporting text. Our comment, made at the previous consultation that the Policy is not consistent with Rother District Council's approach to development contributions and our suggested changes to the policy have not been taken into account. We therefore suggest that the Policy is amended as follows which reiterates our previous suggestion, clarifies how it should be applied and makes it consistent with the supporting text. (Strikethrough wording is to be removed, the text in red italics is to be added): The Plan supports provision for school education places for every child in Salehurst & Robertsbridge in whichever of Robertsbridge Community College (RCC), Salehurst C of E Primary School (SPS) or Robertsbridge Children's Services (RCS). Any housing development will only be permitted if it can be demonstrated that either the expected child yield would not result in the Schools exceeding the maximum number of children permitted on its roll or that appropriate modifications and/or extensions to the School can be delivered at the developer's expense. <i>Development Contributions (CIL, S106 or any future mechanism) should be used to help fund appropriate modifications and/or extensions to education facilities if required.</i> It is also recommended that additional changes to clarify and make the supporting text clearer are made. References to the current capacity in education facilities have been removed as pupil numbers change and the text would quickly become out-of-date. Amendments also take into account future potential changes to development contributions. 3.2.1 All education sites are either full or near capacity and any significant development will put further pressure on allocating child places. Pupil forecasts undertaken by ESCC in July 2016 show that there is sufficient education capacity to schools can cope with the additional demand from the development proposed. ESCC is therefore not currently proposing expanding education provision in the area. However RCS is already at capacity with a substantial waiting list. However, should if pupil forecasts change then expansion of education facilities may be required and in line with RDC's CIL Charging Schedule Reg. 123 list either CIL monies or S106 contributions, or any future mechanism should be used to help address any the shortfall in pupil education places.		yes
ROB/R16/2017/22b	Mr Chris Flavin	East Sussex County Council	N/a	N/a	Object	IN8			Policy IN8 - Flood Risk Management Further to our comments made at the previous Pre-submission consultation stage we still have major concerns with Policy IN8. The inclusion of a specific Policy on Flood Risk within a Neighbourhood Plan would normally only be appropriate if it offered a locally distinct application of policy that is consistent with national and local planning policy. We believe this is not the case with Policy IN8. Therefore, we are firmly of the view that inclusion of this policy in the plan would be in conflict with the relevant basic conditions regarding consistency and conformity with national planning policy and the strategic policies in the Rother Development Plan. Given that the wording of the policy leads to ambiguity and confusion, and does not seem to conform with either the Local Plan or National Policy, we would recommend that Policy IN8 is deleted. However, if the Parish Council would still like to include a section on Flood Risk Management within the Neighbourhood Plan, we would recommend the use of a statement or guidance note instead of a Policy. Such a statement could be used to set out the context of flood risk management when assessing development proposals and it would need to make accurate reference to East Sussex County Council's role as a Statutory Consultee to the planning system, and to the East Sussex Local Flood Risk Management Strategy 2016 – 2026 and relevant guidance at https://www.eastsussex.gov.uk/environment/flooding		yes

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ROB/R16/2017/22c	Mr Chris Flavin	East Sussex County Council	N/a	N/a	Comment	EN3			<p>Ecology</p> <p>In relation to the ESCC November 2016 response to the Reg 14 pre-submission consultation specifically Paragraph 6.1, the Consultation Statement refers to Policy EN3. Whilst this policy does make reference to the conservation and enhancement of some natural features, it is primarily concerned with landscape and does not take into account the need to have a general policy for the conservation and enhancement of biodiversity more generally. The objectives remain unchanged and therefore our previous comments remain the same.</p> <p>None of the other ecology comments that were raised in the previous response seem to have been addressed. Our previous comments therefore remain the same and we would like to reiterate these points.</p> <p>Additional information was supplied which can be viewed here: http://www.rother.gov.uk/CHttpHandler.ashx?id=28311</p>		
ROB/R16/2017/23	Elizabeth Cleaver	Highways England	N/a	N/a	Comment	Full plan			<p>We previously commented on the Salehurst and Robertsbridge Neighbourhood Development Plan in our email of 1 November 2016. I can confirm that the comments in that email are still relevant and so I have copied it below.</p> <p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p> <p>We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the strategic road network, in this case the A21.</p> <p>Having reviewed the plan, the following comments should be noted</p> <ul style="list-style-type: none"> In relation to Policy EC6 point 3 on page 28, please note that Highways England will be concerned with developments that result in intensification of use of an existing access on to the A21. Any such proposals would need careful consideration in relation to the type of access already provided and whether or not it would still be suitable for use following re-development of the site. The Design Manual for Roads and Bridges document TD 41/95 'Vehicular Access to all Purpose Trunk Roads' gives guidance on the appropriate type of access for smaller development sites. The creation of a new access to the A21 is likely to be resisted by Highways England unless there is significant economic benefit in doing so and that the new access would not be detrimental to the safe and efficient operation of our network. Policy HO3 point 3 on page 38, Highways England would seek to resist the creation of new direct access to the A21 unless there is significant economic benefit in doing so and that the new access would not be detrimental to the safe and efficient operation of our network. The cumulative traffic effects of development will need careful consideration in relation to the efficient operation of the A21 specifically the roundabout junction with Northbridge Street and Church Lane as well as the priority junction with George Hill. Detrimental effects on the operation of these junctions may necessitate highway improvements which will need to be funded by development. We note that a Traffic Management Plan is proposed on page 56. As such, we recommend that early consultation is undertaken with Highways England in development of this plan. On page 7 of Annex 2: Site Assessment Document, we note that access to/from the A21 may be required for the Slides Farm and Grove Farm Phase 2 sites. Please note that Highways England would seek to resist creation of new direct access to the A21 unless there is significant economic benefit in doing so and that the new access would not be detrimental to the safe and efficient operation of our network. The cumulative traffic effects of development will need careful consideration in relation to the efficient operation of the A21 specifically the roundabout junction with Northbridge Street and Church Lane as well as the priority junction with George Hill. Detrimental effects on the operation of these junctions may necessitate highway improvements which will need to be funded by development; and The cumulative traffic effects of all development being brought forward as a result of the Neighbourhood Plan will need careful consideration in relation to the efficient operation of the A21 specifically the roundabout junction with Northbridge Street and Church Lane as well as the priority junction with George Hill. Detrimental effects on the operation of these junctions may necessitate highway improvements which will need to be funded by development. <p>I trust that the above information is of assistance and thank you again for consulting Highways England.</p>		
ROB/R16/2017/24	Messrs Higgins	n/a	Mr Paul Atherton	Savills	Support	Housing Section 3.4			<p>On behalf of our clients Messrs Higgins we have provided the below comments:-</p> <p>We refer to the Strategic Housing Land Availability Assessment 2013 in our support of the following site- RB13 East and West- Land West of Johns Cross Road.</p> <p>The site was also submitted in the 'Call for Sites' stage as part of the Salehurst and Robertsbridge Neighbourhood Development Plan (SRNDP) under reference Land West of Johns Cross Road.</p> <p>Land is situated West of John's Cross Road, from the house to the south of Heathfield Gardens and extends south to Browns Farm and West to the land owned by the Mountfield Court Estate. the SHLAA has referenced 'RB13east' that sits on part of the land.</p> <p>The parcel of land referenced RB13 Land West of Johns Cross Road comprises two parcels of land east and west with the current status as follows:</p> <ol style="list-style-type: none"> land west of Johns Cross Road- RB13- east- Offers opportunity with the landowner for housing allocation. The landowner will be happy to provide further information on the site and we hope the site delivers the aims and objectives of the SRNDP and Core Strategy. Land west of John Cross Road- RB13 west- We understand this parcel of land also offers opportunity for housing allocations subject to negotiations and consent from the current owners. <p>Under the site assessment scoring and preferred options for the Salehurst and Robertsbridge Neighbourhood Development Plan the steering group concluded that both parcels of land (named as Heathfield Gardens west and east for this exercise) were suitable for the type of development proposed, both sites were available and both sites were achievable and economically viable. On this basis the steering committee selected the sites as one of their preferred options.</p> <p>We would strongly recommend and support for the sites to be allocated and included in the new Local Plan.</p> <p>We confirm that the sites are immediately available and deliverable for the residential development.</p>	yes	yes
ROB/R16/2017/25	Gardner Crawley	Rother Valley Railway	N/a	N/a	Comment	Presubmission Plan	1.4.7		<p>The Rother Valley Railway project to re-connect the railway from Robertsbridge to Bodiam should be included in the Neighbourhood Plan as Rother District Council Planning Committee unanimously approved the planning application for the Northbridge Street to Junction Road "missing link" at its meeting on 16 March 2017. The plan will at least encourage strategies to minimise the impact of the arrival of the railway on the village and maximise its economic benefit.</p> <p>The reconnection is included in RDC Plan Policy EM8 and RVR has already made significant progress in progressing the scheme and meeting the three criteria laid down for continuing RDC support.</p> <p>At the Eastern end RVR has rebuilt this section of the railway from Bodiam to Junction Road so Kent & East Sussex Railway was able to start running passenger trains in 2011.</p> <p>At the Robertsbridge end of the line RVR has purchased further land since 2006 and is building a heritage style terminus station for Kent & East Sussex Railway allowing it to run passenger trains in 2013. The reconnection between Rother Valley Railway and the Network Rail main line was formally opened by Sir Peter Hendy, Chairman of Network Rail on 6 December 2016.</p> <p>The central two mile section of the railway to be restored is included in RDC Plan Policy EM8 and required the Rother Valley Railway to meet three key criteria, which it has. RVR is aware that in spite of overwhelming support for this restoration scheme, there are local people who have expressed concerns about level crossings and excessive parking in Robertsbridge itself. Their fears will be addressed as the scheme progresses and it is to be hoped that the economic benefits of the scheme will become apparent. The remaining landowners have additionally expressed concern and RVR fully appreciates that a railway crossing their farms represents some disruption. RVR has met with the three landowners and will continue to engage with them with a view to acquiring the original trackbed by agreement.</p> <p>All of this work has to date been financed by private benefactors, without recourse to public funds. Independent studies have shown that the reinstatement of RVR will bring economic benefits in excess of £2m p.a. to the area. To-date RVR has spent over £3million in implementing Rother District Council's Policy EM8 and RVR looks forward to the Council's continuing support to complete the project.</p> <p>Next steps are to complete construction of the toilet block at Robertsbridge Junction Station (RBJS) for the benefit of visitors to the site and to prepare for the Transport and Works Act Order (TWAO). This will provide the statutory powers to build and operate the railway. When complete the line will be operated by Kent & East Sussex Railway using its staff, rolling stock, and procedures.</p>	yes	yes
ROB/R16/2017/26	Ms Claire Tester	High Weald AONB Unit	N/a	N/a	Support	EN3			<p>I support the proposed policy as being in general conformity with the NPPF in that it gives great weight to conserving and enhancing the AONB, and adding local distinctiveness to the national policy by referring to the High Weald AONB Management Plan and the specific landscape components in the parish that need conserving and enhancing.</p>		yes

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ROB/R16/2017/27	Mrs Sophie Page	Environment Agency	N/a	N/a	Comment	IN8	1.4.3		<p>This policy is confusing and appears to side-step national flood risk policy. It suggests that the principle of 'minor' housing development and commercial extensions do not need to consider flood risk which is contrary to national policy. Policy IN8 also suggests that development in flood risk areas will be acceptable providing mitigation measures to deal with surface water are provided. This approach again would be contrary to national policy and would bypass the requirements of the Sequential and Exception Tests, detailed in National Planning Policy Framework (NPPF).</p> <p>Development in flood risk areas should only go ahead when there are no other suitable sites in a lower flood risk area available. This needs to be demonstrated via the Sequential Test, either on a local plan site selection basis or at the application stage. There should not be a presumption that development is acceptable in flood risk areas, subject to mitigation measures.</p> <p>We do not think there should be a policy included in the Neighbourhood Plan that suggests any deviation from NPPF, the requirements of the Sequential and Exception Tests and the need for all planning proposals in flood risk areas to be supported by a site specific flood risk assessment.</p> <p>We support the final comment in respect to the presumption against culverting and the loss of open watercourses. However, the final part of this policy is not really necessary and is again confusing. Any development proposal will need to ensure a satisfactory means of surface water disposal that will need to be approved by the Lead Local Flood Authority. If other bodies/landowners need to be consulted as part of this process (e.g. if the receiving watercourse in 'main river' then the Environment Agency may need to comment) then this will be on a case by case basis.</p> <p>Groundwater and Contaminated Land</p> <p>We have no detailed comments in relation to groundwater protection and contaminated land to make in reference to the Neighbourhood Plan.</p> <p>We would recommend that site allocations on land with previous use will need to address potential contamination issues by adequate investigation and risk assessment, to assess if the sites can be developed cost-effectively. In this case sites such as Mill Site will need assessment.</p> <p>Detailed comments on any specific site will be provided at the planning application stage, to ensure adequate investigation, and if necessary remediation, is carried out to address any identified contamination and risks to controlled waters.</p> <p>Any new proposals should ensure that sustainable drainage design will achieve appropriate protection of groundwater.</p> <p>Fisheries and Biodiversity</p> <p>We support the ambition within policy IN8 with regards to retaining open watercourses as keeping watercourses open is also important to maintain ecological value. However this matter should be addressed independently of policy IN8 as this policy is for the purpose reducing flood risk, and we have issue with it as detailed above.</p> <p>The National Planning Policy Framework (NPPF), paragraph 109 recognises that the planning system should aim to conserve and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. Watercourses and the habitats alongside them, along with other linear habitat features, make an important contribution to ecological networks. Although the draft Environment policies support the retention of well-established landscape features, they do not specifically refer to ecological networks and the habitats that contribute to them. Acknowledging the value of linear habitats as ecological networks within the policies could contribute to protecting local biodiversity.</p> <p>We hope you find our response helpful. Please contact me if you would like further information. Mrs Sophie Page, Planning Advisor</p>		
ROB/R16/2017/28	Ian Lings	Woodland Trust	N/a	N/a	Object	EN3			<p>Policy EN3: Countryside Protection and the Parish's place within the High Weald AONB</p> <p>We are pleased to see that your Neighbourhood Plan supports conserving and enhancing woodland with management and also it seeks to reduce the loss of Ancient Woodland, but it is also important to plant more trees as well in appropriate locations, ie to expand the amount of trees and woodland, to provide enhanced green infrastructure for local communities and to mitigate against future loss of trees to disease (eg Ash dieback) with a new generation of trees both in woods and also outside woods in streets, hedgerows and amenity sites.</p> <p>The Woodland Trust believes that trees and woods can deliver a wide range of benefits for placemaking for local communities, in both a rural and urban setting, and this is strongly supported by current national planning policy. The Woodland Trust believes that woodland creation is especially important because of the unique ability of woodland to deliver across a wide range of benefits – see our publication Woodland Creation – why it matters</p> <p>http://centrallobby.politicshome.com/fileadmin/epolitix/stakeholders/4117WoodandCreationbro.pdf</p> <p>These include for both landscape and biodiversity (helping habitats become more robust to adapt to climate change, buffering and extending fragmented ancient woodland), for quality of life and climate change (amenity & recreation, public health, flood amelioration, urban cooling) and for the local economy (timber and woodfuel markets).</p> <p>The National Planning Policy Framework (NPPF) also supports the need for more habitat creation by stating that: 'Local planning authorities should: set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure', (DCLG, March 2012, para 114). Also para 117 states that: 'To minimise impacts on biodiversity and geodiversity, planning policies should:....promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan'.</p> <p>The England Biodiversity Strategy which makes it clear that expansion of priority habitats like native woodland remains a key aim - 'Priority action: Bring a greater proportion of our existing woodlands into sustainable management and expand the area of woodland in England', (Biodiversity 2020: A strategy for England's wildlife and ecosystems services, DEFRA 2011, p.26).</p> <p>A reading of these two policies in the NPPF together with the England Biodiversity Strategy indicates that habitat expansion, like native woodland creation, should form a high priority for this new Neighbourhood Plan.</p> <p>Woodland creation also forms a significant element of the Government Forestry Policy Statement (Defra Jan 2013): 'We believe that there is scope for increasing England's woodland cover significantly to deliver economic, social and environmental benefits. We want to see significantly more woodland in England. We believe that in many, although not all, landscapes more trees will deliver increased environmental, social and economic benefits. We particularly want to see more trees and woodlands in and around our towns and cities and where they can safeguard clean water, help manage flood risk or improve biodiversity'.</p> <p>The Woodland Trust also believes that trees and woodlands can deliver a major contribution to resolving a range of water management issues, particularly those resulting from climate change like flooding and the water quality implications caused by extreme weather events. This is important in an area like Salehurst and Robertsbridge which has historically suffered from localised severe flooding. Trees offer opportunities to make positive water use change whilst also contributing to other objectives, such as biodiversity, timber & green infrastructure - see the Woodland Trust publication Stemming the flow – the role of trees and woods in flood protection -</p> <p>https://www.woodlandtrust.org.uk/publications/2014/05/stemming-the-flow/</p> <p>We would therefore like to see Policy EN3 wording amended to read (upper case amendments) – "All development will be considered with regard to the need to protect AND ENHANCE the landscape character of the countryside as the whole of the Parish"</p>		

Representations

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ROB/R16/2017/28a	Ian Lings	Woodland Trust	N/a	N/a	Object	EN4			<p>Natural Environment – Trees & Woodland Conservation</p> <p>It is critical that the irreplaceable semi natural habitats of ancient woodland and ancient trees are absolutely protected. It is not possible to mitigate the loss of, or replace, ancient woodland by planting a new site, or attempting translocation. Every ancient wood is a unique habitat that has evolved over centuries, with a complex interdependency of geology, soils, hydrology, flora and fauna. This requires absolute protection in accordance with emerging national policy as set out below.</p> <p>It is also important that there is no further avoidable loss of ancient trees through development pressure, mismanagement or poor practice. The Ancient Tree Forum (ATF) and the Woodland Trust would like to see all such trees recognised as historical, cultural and wildlife monuments and highlighted in plans so they are properly valued in planning decision-making. There is also a need for policies ensuring good management of ancient trees, the development of a succession of future ancient trees through new street tree planting and new wood pasture creation, and to raise awareness and understanding of the value and importance of ancient trees. The Ancient Tree Hunt (http://www.ancient-tree-hunt.org.uk/) is designed specifically for this purpose.</p> <p>National policy is increasingly supportive of better protection of ancient woodland and ancient trees. The Communities and Local Government (CLG) Select Committee published its report following its June 2014 inquiry into the 'Operation of the National Planning Policy Framework (NPPF)', in which it has specifically recognised the need for better protection for ancient woodland (Tues 16th Dec 2014). The CLG Select Committee report states: <i>'We agree that ancient woodland should be protected by the planning system. Woodland that is over 400 years old cannot be replaced and should be awarded the same level of protection as our built heritage. We recommend that the Government amend paragraph 118 of the NPPF to state that any loss of ancient woodland should be "wholly exceptional". We further recommend that the Government initiate work with Natural England and the Woodland Trust to establish whether more ancient woodland could be designated as sites of special scientific interest and to consider what the barriers to designation might be.'</i></p> <p>http://www.publications.parliament.uk/pa/cm201415/cmselect/cmcomloc/190/190.pdf.</p> <p>This shows a clear direction of travel, recognising that the NPPF does not currently provide sufficient protection for ancient woodland. Until the NPPF is amended there is a clear role for Local and Neighbourhood Plans, and associated documents, to provide this improved level of protection and to ensure that irreplaceable habitats get the same level of protection as heritage assets enjoy under the NPPF.</p> <p>This recommendation should also be considered in conjunction with other - stronger - national policies on ancient woodland -</p> <ul style="list-style-type: none"> The Government's policy document 'Keepers of Time – A statement of Policy for England's Ancient & Native Woodland' (Defra/Forestry Commission, 2005, p.10) states: <i>'The existing area of ancient woodland should be maintained and there should be a net increase in the area of native woodland'</i>. The Government's Independent Panel on Forestry states: <i>'Government should reconfirm the policy approach set out in the Open Habitats Policy and Ancient Woodland Policy (Keepers of Time – A statement of policy for England's ancient and native woodland).....Reflect the value of ancient woodlands, trees of special interest, for example veteran trees, and other priority habitats in Local Plans, and refuse planning permission for developments that would have an adverse impact on them.'</i> (Defra, Final Report, July 2012). This has been endorsed by the response in the Government Forestry Policy Statement (Defra Jan 2013): <i>'We recognise the value of our native and ancient woodland and the importance of restoring open habitats as well as the need to restore plantations on ancient woodland sites. We, therefore, confirm our commitment to the policies set out in both the Open Habitats Policy and Keepers of Time, our statement of policy for England's ancient and native woodland'</i>. The Government's Natural Environment White Paper – The Natural Choice: securing the value of nature (HM Government, July 2011, para 2.56) states that: <i>'The Government is committed to providing appropriate protection to ancient woodlands'</i> The Biodiversity Strategy for England (Biodiversity 2020: A Strategy for England's Wildlife & Ecosystem Services, Defra 2011, see 'Forestry' para 2.16) states that – <i>'We are committed to providing appropriate protection to ancient woodlands and to more restoration of plantations on ancient woodland site'</i>. <p>We would therefore like to see Policy EN4 amended to include –</p> <p>"Development proposals directly or indirectly affecting ancient woodland or ancient trees will not be accepted".</p>		
ROB/R16/2017/28b	Ian Lings	Woodland Trust	N/a	N/a	Comment	EN9			<p>Whilst the Woodland Trust is pleased to see that Policy EN9 seeks to protect and manage locally listed trees, as this will assist with meeting local community and recreational needs, our Space for People publication can also be taken into account given that this and the Woodland Access Standard (WAS) provide an important policy tool complementing other access standards which can be used in delivering green infrastructure standards. Whilst your Neighbourhood Plan seeks to complement your vision and objectives by setting out in more detail the development aspirations and the planning requirement for the delivery of key development sites, if the WAS is acknowledged accordingly together with Space for People, which is the first UK-wide assessment of any form of greenspace, this would provide an important contributor to the design of green infrastructure and placemaking in the Neighbourhood Plan for Salehurst and Robertsbridge.</p> <p>Therefore, we would like to see the importance of trees and woodland recognised for providing healthy living and recreation. In an era of ever increasing concern about the nation's physical and mental health, the Woodland Trust strongly believes that trees and woodland can play a key role in delivering improved health & wellbeing at a local level. At the same time, the Health & Social Care Act 2012 has passed much of the responsibility for health & wellbeing to upper-tier and unitary local authorities. This is reinforced by the Care Act 2014.</p> <p>Although the relationship between the natural environment and health is a complex one, it is now widely accepted that green infrastructure – such as trees, woods and forests – can contribute to both preventative and restorative wellbeing solutions.</p> <p>Increasing evidence has demonstrated the critical impact that trees can make in encouraging more active lifestyles and alleviating the symptoms of some of our most debilitating conditions such as dementia, obesity, heart disease and mental health problems.</p> <p>This linkage between woodland and health is now firmly embedded in national Government policy for health, planning and forestry –</p> <ul style="list-style-type: none"> Health: <i>'Access to green spaces is associated with better mental and physical health across socioeconomic groups.....Defra will lead a national campaign to increase tree planting throughout England, particularly in areas where tree cover would help to improve residents' quality of life and reduce the negative effects of deprivation, including health inequalities.'</i> Healthy Lives, Healthy People (Government White Paper, November 2010, paras 3.36-37). Planning: <i>'Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision.'</i> National Planning Policy Framework (DCLG, March 2012, para 73). Forestry: <i>'Our trees, hedgerows, woods and forests contribute significantly to the quality of life in both rural and urban areas. Amongst other things, they enhance the local environment and biodiversity, support economic growth through regeneration, help mitigate the impact of climate change, assist in reducing air pollution and provide important health and educational benefits...The Natural Environment White Paper recognised the value and potential for green spaces to support and contribute to everyone's health and well-being. This is being reflected in the Public Health Outcomes Framework, which underpins the new public health duty of local authorities.'</i> Government Forestry Policy Statement (Defra, January 2013, p.16). <p>Recognising this, the Woodland Trust has researched and developed the Woodland Access Standard (WAS) for local authorities to aim for, encapsulated in our Space for People publication. We believe that the WAS can be an important policy tool complementing other access standards used in delivering green infrastructure.</p> <p>The WAS is complimentary to Natural England's ANGST+ and is endorsed by Natural England. The Woodland Trust Woodland Access Standard recommends:</p> <ul style="list-style-type: none"> - that no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size - that there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round-trip) of people's homes. <p>Please do not hesitate to get in touch with me if you have any queries arising from this response. In addition you may find our neighbourhood planning hub a useful resource: https://www.woodlandtrust.org.uk/get-involved/campaign-with-us/in-your-community/neighbourhood-planning/.</p>		
ROB/R16/2017/29	Robert Lloyd Sweet	Historic England	N/a	N/a	Object	EC1 & EC6			<p>Policy EC1 - We are pleased to see the steering group have adopted our suggested that this policy should promote maintenance and restoration of historic shopfronts as a valued element of the conservation area's character and appearance. This helps to apply national policy locally by identifying an element of this conservation area in particular that should be considered in planning decisions. As an add on to the original policy this could be improved to provide more clarity and we would suggest the wording is amended slightly to read:</p> <p>"and where applications would affect historic shopfronts within the conservation area, these should be conserved for their contribution to the area's character and historic or architectural interest and, where practicable, enhanced through sensitive restoration."</p> <p>We are pleased to support Policy EC6 where the Steering group have incorporated our suggested amendment to provide a suitable approach to the conversion or extension of historic buildings including heritage assets. As such we feel that provision 1. In the policy is no longer necessary and should be removed to avoid confusion.</p>		
ROB/R16/2017/29a	Robert Lloyd Sweet	Historic England	N/a	N/a	Support EN8; Comment EN6	EN6 & EN8			<p>Policy EN6 - We support the intention of the policy but would suggest the wording is simplified to make it easier to understand:</p> <p>"Any Designated historic heritage assets in the Parish and their settings, including listed buildings, historic public realm, sites of archaeological significance and any scheduled monuments that may be scheduled or conservation areas that may be created will be preserved, conserved, and/or enhanced where necessary, for their historic significance, including the contribution made by their settings and their importance to local distinctiveness, character and sense of place.</p> <p>This could still be made clearer as a development control policy by requiring new development to achieve this outcome</p> <p>The second and third paragraphs of the policy implement the approach set out in the NPPF at the neighbourhood level.</p> <p>We support the development of a local list through the Neighbourhood Plan and see this as an important element of implementing the National Planning Policy Framework's requirement to identify both designated and non-designated heritage assets early in the decision making process. We consider the criteria use (set out in the Historic Environment Study) to be suitable.</p> <p>We are pleased to support Policy EN8 and see this as the implementation of National and Local Planning Policy at the neighbourhood level.</p>		

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ROB/R16/2017/29b	Robert Lloyd Sweet	Historic England	N/a	N/a	Comment	EN9			We support the identification of other elements of the historic landscape as worthy of protection but would suggest that trees and hedgerows do not meet the definition of a heritage asset set out in the NPPF. We recommend using an alternative term to local listing to make it clear that these are 'local character features' rather than confusing them with the buildings or structures on the local list. Nevertheless trees and hedgerows do fall within the broader definition of the historic environment set out in the NPPF as 'planted or managed flora'. It may be worth considering whether any of the hedgerows meet the criteria of 'important hedgerows' set out in the Hedgerows Regulation (1997) and should therefore be identified as such.		
ROB/R16/2017/29c	Robert Lloyd Sweet	Historic England	N/a	N/a	Object	HO3			We recommend identifying the need to protect the listed oast house and its setting in the supporting information to Policy HO3, as well as possibly identifying the opportunity that development provides to secure the long term viable use of the building and of providing greater public access to it. This is required where a development proposal is likely to create a pressure affecting a specific heritage asset that will require mitigation. We see the provision of access as a potential mitigation for harm to the setting of the listed building which should be secured as a public benefit within the policy itself where this is considered necessary to make the development as a whole acceptable. As such we suggest the insertion of a bullet point stating: "Development proposals for The Mill site should include a commitment to undertake any necessary restoration to the listed oast house as well as providing a setting for this building within the development that sustains its historic and architectural interest and promotes its enjoyment by the public. Any restoration work required to the oast house should be completed before 50% of residential units on this site are completed and occupied. Proposals should include details of arrangements for future maintenance of the oast house including its conservation within a beneficial use as an educational and tourism related resource as the optimum beneficial use." The Steering group have been a little over zealous in incorporating our recommended amendment to this policy at the regulation 14 stage, as such we would be pleased if the examiner could remove the words ", which is better understood as a programme of work to understand the area's archaeological potential and interest", which was part of our explanation of the appropriate use of the term "investigation" as opposed to "assessment". Appropriate wording for bullet point 7. Might be: "7. The completion of a programme of archaeological investigation in accordance with a written scheme of investigation which has been submitted by the applicant and approved in writing by Rother District Council. Proposals should demonstrate that the findings of investigation have been taken into account in the design and layout of development. Archaeological remains of national importance will be required to be preserved in situ. Where the merits of development outweigh the harm that would result from less of remains of lesser importance developers will be required to make a record of any remains that are to be lost." We hope these comments are of assistance to the examiner but would be pleased to answer any queries relating to them or to provide further information that may be of assistance.		
ROB/R16/2017/30	Mr Max Meyer	Hodson's Mill Limited	N/a	N/a	Support	Housing provision Employment Delivery Appropriate mix of housing/employment			BACKGROUND Our site, which extends up to 4.05ha in size, is located to the north east of Robertsbridge. The extent of the site is delineated by the enclosed red line plan. It is identified as the "Mill Site" within the draft Neighbourhood Plan. The Site was formerly known as Mill Farm and comprised a large four storey brick building known as Hodson's Mill, which was built in the late eighteenth century, amongst a number of other industrial units. The site was latterly occupied by Grampian Country Food Group, for the production of chicken feed. Production at the Site ceased in November 2004 (resulting in the loss of a total of 17 jobs) and a number of the industrial buildings have since been removed. The site has since been vacant for a considerable period of time and needs to be brought back into beneficial use. It has unfortunately recently attached several instances of vandalism and anti-social behaviour. Accordingly, our client has submitted a full planning application (which is awaiting determination) for the following development "98 no. residential dwellings (Use Class C3), non-residential floorspace comprising 280 sqm (Use Class A3) and 920 sqm (Use Class B1), and associated access, car/cycle parking, open amenity space, strategic landscaping and green infrastructure and restoration works to the Mill Building and Oast House". We therefore support the identification of the site as one of the three preferred locations to enable the local housing requirement (155 dwellings) to be delivered during Rother District Council's (DC) Local Plan Period to 2028. For the avoidance of doubt, we wish to be afforded the opportunity to participate in any future oral examination in regard to the emerging Neighbourhood Plan.	yes	yes
ROB/R16/2017/30a	Mr Max Meyer	Hodson's Mill Limited	N/a	N/a	Support	HO3 & Map 11			HOUSING PROVISION The draft Neighbourhood Plan (NP), at Policy HO3, has allocated three key sites to help deliver the Core Strategy housing target of 155 units (of which 130 remain). Following a comprehensive assessment of the general suitability and sustainability of the 13 different development site options proposed, the following three sites have been allocated for residential development: 1. Mill Site (the "site") – Approximately 100 units; 2. Heathfield Gardens – Approximately 40 units; and 3. Vicarage Land – Approximately 10 units). The site comprises previously developed land, in an accessible location, unfettered by multiple land ownerships, close to existing amenities and within the settlement boundary. Furthermore, it benefits from overwhelming public support as demonstrated by previous consultation events held by the applicant and in association with the Neighbourhood Plan process. We agree that the site fully accords with the overarching presumption in favour of sustainable development as set out in the NPPF and local policy. In addition, it is considered that the site in its current derelict and under utilised form creates a significant eye sore within the surrounding landscape. As such, the allocation for the site fully accords with the principles of sustainable development. Further, it is clear that the delivery of the site will be crucial in terms of enabling the local housing needs of the area to be met and represents an opportunity for the dilapidated Mill Building and Oast House heritage assets to be restored. The site's allocation is therefore supported . As an aside, Map 11 (at Annex 1) proposes an extension of the Robertsbridge development boundary to incorporate the whole of our client's ownership (as opposed to Rother DC's current definition which excludes the northern most element). This proposed amendment is supported in order to enable our client to deliver the efficient and effective re-use of the site. At present, Rother DC's definition of the development boundary is arbitrary and not reflective of our client's ownership or the historical boundaries of this brownfield site.	yes	yes
ROB/R16/2017/30b	Mr Max Meyer	Hodson's Mill Limited	N/a	N/a	Support	General employment strategy including Polices EC2 and EC3			The NP sets out a number of policies relating to the economy and the retention and encouragement of employment uses. It is also acknowledged within the draft Neighbourhood Plan that the Core Strategy identifies a need for 10,000sq.m of employment floorspace to be delivered over the plan period in rural areas. Our previous view (as outlined within our representations to the pre-submission consultation document) was that the NP should seek to provide further context in regard to how Salehurst and Robertsbridge will contribute towards meeting this target (given that no commercial or employment allocations are currently identified). Whilst Robertsbridge is a rural village (and not suitable to accommodate significant employment floorspace due to its relatively isolated location and limited range of supporting services) it does represent one of the larger villages within the district and thus is a potentially suitable location for future employment growth. However, following further research undertaken in preparation of our planning application, it has come to light that the 10,000sqm employment floorspace target has already been met due to the strong performance of Rother's rural areas in recent years, which have seen significant employment growth (including at Robertsbridge itself). Accordingly, the Council's published Employment Sites Review Background Paper considers that, going forward, the most appropriate policy approach to be applied within the rural areas will be to: • Continue to resist the loss of existing business sites and floorspace to other uses (which is seen to be justified in the towns as well as the rural areas) unless there is very clear evidence that it is not needed; • Enable further floorspace to come forward at existing areas and sites in suitable locations and subject to strict environmental criteria; • Promote mixed-use business and residential developments on suitable sites in and around settlements through emerging documents such as Neighbourhood Plans; • Take a supportive approach to working at or from home, including in relation to ancillary buildings within residential curtilages, subject to amenity and environmental criteria. It is our view, therefore, that the Neighbourhood Plan's approach to promoting facilities to enable a growth in working from home (at Policy EC2) is supportable . In these terms, it is worthwhile noting that the Mill site will benefit from installation of a high speed internet connection that will promote working from home opportunities and in turn, the local economy. Furthermore, Policy EC3 offers clear guidance in regard to the protection of existing employment areas (which is in accordance with the above criteria). This is supported . Given that Robertsbridge is a rural village location, there are not a wide range of potential sites which can be specifically allocated for employment use (as you would expect to find within larger, more accessible urban settlements with dedicated employment/commercial areas). Accordingly, the approach of the Neighbourhood Plan is to offer a framework which protects existing employment sites, whilst encouraging new floorspace where appropriate (ie as part of mixed use developments). This is considered to represent an appropriate strategy which accords with the recommended approach of the Council's Employment Sites Review Paper. By way of demonstration, the planning application at the Mill Site proposes 1,200sqm of new commercial floorspace which will result in a significant net increase in job numbers compared to when the site was last in use in 2004. This additional floorspace will enable Robertsbridge to continue to make an important contribution to the employment supply of the wider District, notwithstanding that the rural target of 10,000sqm has already been met.	yes	yes

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ROB/R16/2017/30c	Mr Max Meyer	Hodson's Mill Limited	N/a	N/a	Support	Housing/Employment - HO3 (re Mill Site)			<p>APPROPRIATE MIX OF HOUSING/EMPLOYMENT</p> <p>It is proposed that the Mill site will deliver 98 residential dwellings and an element of employment generating floorspace within a residential led mixed use development. It is important to note that the site is being brought forwards for residential led development in accordance with the vision of the draft NP. Further, it is noteworthy that the site is identified as a preferred location to accommodate new housing and is the only location capable of accommodating strategic scale residential development.</p> <p>The Rother Housing Land Supply Report (dated April 2016) establishes that the District cannot demonstrate a 5 year land supply of deliverable housing sites in accordance with the requirements of Paragraph 47 of the NPPF. As such, it is clear that the delivery of the site, for approximately 100 dwellings, will be crucial in terms of enabling the local housing needs of the area to be met (whilst enabling the sustainable regeneration of a long vacant and underutilised brownfield asset).</p> <p>In terms of the employment provision, the NPPF highlights that the long term protection of sites allocated for employment use should be avoided where there is no reasonable prospect of the site being used for employment use. Accordingly, applications for alternative uses should be treated on their merits having regard to market signals and the need for different land uses to support sustainable local communities. Whilst our client's site is not allocated for employment use, it is clear that the thrust of the policy is relevant in this instance.</p> <p>It would therefore not be appropriate (in the context of the community's vision for future development within Robertsbridge, the District's inability to demonstrate a 5 year housing land supply and commercial market conditions) to insist upon delivery of an overly excessive amount of employment floorspace at the site at the expense of maximising the residential yield.</p> <p>SUMMARY AND CONCLUSIONS</p> <p>The Mill Site is an underutilised vacant brownfield landholding which falls under single ownership and is readily available for redevelopment. It represents the most sustainable option for development in planning terms, and is also the only site capable of accommodating a significant scale of residential development within Robertsbridge.</p> <p>As such, we consider that the site has an integral part to play in the delivery of the required housing target and fully support its allocation within the draft Neighbourhood Plan.</p>	yes	yes
ROB/R16/2017/31	Ms Helen Flanagan		N/a	N/a	Object	HO3 - Vicarage land			<p>I take the opportunity to formally register my objection to the proposed development of the land referred to in the Robertsbridge & Salehurst Neighbourhood Plan (the 'Plan') as the 'Vicarage Land' and highlight the 'considerable' concerns which have been voiced by a majority of the respondents – ref. S. 3.0.2 of Annex 2.</p> <p>The Plan fails to satisfy the direct obligation of the local planning authority to illustrate how development of the 'Vicarage Land' contributes to the safeguarding and enjoyment of the centre of a designated 'ancient' conservation area by developing the 'Vicarage Land' – refer to the National Planning Policy Framework, para. 126.</p> <p>Development of the 'Vicarage Land' will directly contravene the preservation of the very centre of the 'ancient centre of the village' and detract from the special character and appearance. The very purpose of Conservation Area Management is to ensure that local distinctiveness and the special character of a place are respected and responded to in a positive manner. The proximity of the majority of the existing listed dwellings on Fair Lane, which would provide the only option for access to any new development, abut the pavement. The narrow width of the road, which establishes the special character of Fair Lane as a quiet residential lane, is safeguarded by the absence of commercial properties and the absence of through traffic. Development of any additional dwellings on the 'Vicarage Land' will require access via Fair Lane and will result in increased road traffic and worsen an already problematic highways safety issue that is clearly evident. In addition, significant excavation would be required to facilitate the required access for additional dwellings on the 'Vicarage land' and this would directly impact the special character of Fair Lane as a quiet residential lane.</p> <p>Development of the 'Vicarage Land' will also cause an increase in the risk of flooding to high street houses that back on to the 'Vicarage Land' due to the higher gradient of the Vicarage Land in comparison. These properties have flooded previously and development in an area at risk from flooding will increase the risk of property damage, human stress and hardship, problems obtaining property insurance. The construction of protection works either at the time of the development, or at a later date, will incur additional costs, may not provide absolute immunity from the risk of flooding and can, if not appropriately designed, have detrimental effects on flood risk elsewhere.</p> <p>Development of the 'Vicarage Land' would also result in a complete loss of privacy to properties which back on to it directly. Any new development would overshadow and overlook private residences and gardens. Noise pollution would also be compounded by further development given the close proximity and elevation of the 'Vicarage Land' in comparison to all existing properties which line the boundary of the 'Vicarage Land'.</p>	yes	yes
ROB/R16/2017/32	Dr Anthony Leonard	Rother District Council	N/a	N/a	Comment	EC1			<p>Note for information: The requirement for additional provision to "enhance" the village centre retail offer needs to be mindful that planning applications are not specific to a use, and that changes of occupier within the A1 shops use class are permitted development.</p>		
ROB/R16/2017/32a	Dr Anthony Leonard	Rother District Council	N/a	N/a	Support	EC2			<p>The policy is supported.</p>		
ROB/R16/2017/32b	Dr Anthony Leonard	Rother District Council	N/a	N/a	Object	EC3			<p>This policy covers similar ground to the Council's Local Plan Core Strategy policy (also numbered EC3), which is carried forward on a district-wide basis through Policy DEC3 in RDC's emerging Development & Site Allocations (DaSA) Local Plan.</p> <p>However, three concerns are identified:</p> <p>i) It is unclear whether parts 1 and 2 of the policy both need to be met to be compliant. The use of "and" at the end of sentence 1 would be helpful here.</p> <p>ii) In part 2 of the policy, the additional phrase "or as identified by the market" is regarded as undermining the effective retention of business sites and would, inadvertently, encourage the closure of employment sites in order to secure higher value, notably residential, use of a site. In view of the service centre role of Robertsbridge as well as its direct access to the London-Hastings railway line and to the A21 Trunk Road, it would be inappropriate to unnecessarily forgo suitable opportunities for employment provision.</p> <p>iii) Core Strategy policy EC3 requires that, if a continued business use of an employment site is not viable, then first consideration should be given to a mixed use scheme, in order to continue to make most effective use of the property for employment purposes. This is restated in the emerging DaSA Local Plan policy DEC3, supported by an "Employment Sites Review", 2016. Hence, part 3 of the S&RNP policy is not consistent with this strategic approach. Moreover, given the locational advantages of Robertsbridge noted above, together with the fact that the S&RNP proposes the loss of (at least most of) the currently vacant former Mill site to housing, then a robust generic policy is considered vital. This should promote mixed use developments that incorporate business provision, in line with the Core Strategy. Also, the inclusion of "or benefits" is ambiguous and particularly undermines the retention of any employment provision.</p> <p>Proposed amendments:</p> <p>Amend the policy to:</p> <p>a) Suggested Amendment: Add "and" at the end of sentence 1.</p> <p>b) remove the phrase '(or as identified by the market)' in part 2 of the policy;</p> <p>c) redraft part 3 to read: 'the alternative proposal would make effective use of the site for employment alongside other enabling uses or, if not viable, provide other community uses for which a need is identified.'</p>		
ROB/R16/2017/32c	Dr Anthony Leonard	Rother District Council	N/a	N/a	Object	EC4			<p>It is considered helpful for the Neighbourhood Plan to identify potential Assets of Community Value as a supporting "Nominations List". However, the sites listed in policy are not currently registered as Assets of Community Value. This would be subject to a judgement by the local authority as to whether the criteria set out in the Localism Act and supporting regulations had been complied with. Therefore, as outlined in previous RDC comments, the proposed list contained in policy may unduly raise expectations and may be seen to prejudice the AoCV process. In practice, the policy is considered unnecessary as the Parish Council may be reassured that the nominated sites are largely protected by RDC planning policies, as follows:</p> <ol style="list-style-type: none"> 1. Village Hall (Core Strategy Policy CO1, DaSA Policy DCO1) 2. Network Rail Station (Core Strategy Policy TR2vi) 3. Recreation Ground (Core Strategy Policy CO3) 4. St Mary's Church (Core Strategy Policy CO1) 5. Cricket ground and pavilion. (Core Strategy Policy CO3) 6. All school premises (Core Strategy Policy CO1) 7. Allotment sites (Core Strategy Policy CO3) 8. Club (Core Strategy Policy CO1, DaSA Policy DCO1) 9. The Pubs – Ostrich, George, Salehurst Halt and the Seven Stars (DaSA Policy DCO1) <p>Proposed Amendment: Delete the policy</p>		

Representations

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ROB/R16/2017/32d	Dr Anthony Leonard	Rother District Council	N/a	N/a	Object	EC6			<p>This proposed policy relates to Core Strategy policies RA2, RA3 and RA4. It also needs consideration in light of the emerging DaSA policy DCO2 which contains detailed provisions regarding equestrian developments, so as to 'safeguard the intrinsic and locally distinctive character and amenities of the countryside, with particular regard to the conservation of the High Weald AONB'. The effect of the Neighbourhood Plan Policy EC6 may be interpreted as by-passing the provisions of DaSA DCO2 and removing those safeguards which seek to protect the countryside and High Weald AONB. However, insofar as it relates only to existing buildings this issue may be most effectively addressed by adding a proviso that embraces the need to consider the ramifications of EC6a and implications for the High Weald AONB.</p> <p>Policy elements EC6(c) and EC6(1) appear to directly contradict each other. EC6(c) supports the conversion and re-use of historic buildings (subject to supporting criteria), whilst EC6(1) states the opposite it is recommended to resolve this in favour of allowing uses subject to conserving the building's significance, as provided by part c) of the policy.</p> <p>On a more minor point, the title of this policy might be amended to "Re-use and conversion of rural buildings" which better reflects the content of the policy. Similarly, the first line of the policy should also refer to extensions as these are covered by part (b) that follows.</p> <p>Support the policy subject to the following amendments: a) add a further proviso to add to the second list of four provisos which states: 'it has an acceptable impact upon the rural High Weald AONB landscape; b) delete proviso 1, and c) amend the first line of the policy to include 'extension' as well as re-use or conversion Also, consider amending the title to 'Re-use, conversion and extension of rural buildings'.</p>		
ROB/R16/2017/32e	Dr Anthony Leonard	Rother District Council	N/a	N/a	Object	EC7			<p>This policy is generally consistent with the relevant strategic policies of the Core Strategy, notably RA3(ii), EC4 and OSS4. For the reasons set out in response to policy EC3, Robertsbridge has potential to be a rural employment centre and this policy recognises this.</p> <p>Therefore, notwithstanding that the Plan elsewhere supports the loss of business sites, this policy is supported subject to the following amendments to improve clarity by highlighting due regard to local amenities and by recognising that the High Weald is a generally enclosed landscape, but its character may still be harmed by inappropriate development: The Plan states it seeks to work with RDC to identify 'suitable employment /business space.' The Council considers that the Mill site offers a suitable employment opportunity (Cross-refer to comments on Policy HO3).</p> <p>Support the policy subject to the following amendments: a) Amend bullet 1 to read: 'it is in keeping with the character of the area and the amenities of neighbouring properties and minimises visual impact through sensitive siting and design'; b) Remove the final two sentences and include instead in the supporting text.</p>		
ROB/R16/2017/32f	Dr Anthony Leonard	Rother District Council	N/a	N/a	Object	ED1			<p>Having liaised with East Sussex County Council as Local Education Authority (LEA), the Council makes the following representation:</p> <p>There is no real requirement for an education policy in the Neighbourhood Plan as this will be covered by higher level policies and other mechanisms/processes: Infrastructure Delivery Plan, Community Infrastructure Levy (CIL)/Regulation123 list, LEA education forecasting and planning, all of which are updated regularly and therefore reflect the current situation at any one time.</p> <p>However, if the Parish Council feels that they want an education policy in the Plan, then it should be noted that there is a contradiction between the S&RNP Policy ED1 and the supporting paragraph 3.2.1. The second part of ED1 effectively requires works to the schools, but the LEA has already stated "ESCC is therefore not currently proposing expanding education provision in the area" and this statement is included in Neighbourhood Plan paragraph 3.2.1.</p> <p>Therefore, the Council has a concern that the current NP wording, if strictly applied, may have the effect of blocking development based on demands that go over and above the Education Authorities own requirements.</p> <p>It is also appropriate to make amendments to remove references to education sites and RCS being at capacity, as pupil numbers change and the text will quickly become out-of-date. Additional text also takes into account future potential changes to development contributions.</p> <p>Support the policy subject to the following amendments: (Strikethrough wording to be removed text in red italics to be added) 'Policy ED1: The Plan supports provision for school education places for every child in Salehurst & Robertsbridge in whichever of Robertsbridge Community College (RCC), Salehurst C of E Primary School (SPS) or Robertsbridge Children's Services (RCS). Any housing development will only be permitted if it can be demonstrated that either the expected child yield would not result in the Schools exceeding the maximum number of children permitted on its roll or that appropriate modifications and/or extensions to the School can be delivered at the developer's expense. Development Contributions (CIL, S106 or any future mechanism) may be used to help fund appropriate modifications and/or extensions to education facilities if required.'</p> <p>Also, the supporting text (paragraph 3.2.1) be amended as follows: 3.2.1 All education sites are either full or near capacity and any significant development will put further pressure on allocating child places. Pupil forecasts undertaken by ESCC in July 2016 show that <i>there is sufficient education capacity to schools can cope with the additional demand from the development proposed.</i> ESCC is therefore not currently proposing expanding education provision in the area. <i>However RCS is already at capacity with a substantial waiting list.</i> <i>However, should # pupil forecasts change then expansion of education facilities may be required and in line with RDC's CIL Charging Schedule Reg. 123 list either CIL monies or S106 contributions, or any future mechanism should be used to help address any the shortfall in pupil places."</i></p>		
ROB/R16/2017/32g	Dr Anthony Leonard	Rother District Council	N/a	N/a	Object	EN2			<p>The S&RNP appears to designate large areas as Local Green Space (LGS) which raises questions of consistency with the NPPF (paragraph 77) which states that <i>'The Local Green Space designation will not be appropriate for most green areas or open space'</i>.</p> <p>NPPF (para. 77) mentions three factors that are key for the designation to be applied:</p> <ul style="list-style-type: none"> • where the green space is in reasonably close proximity to the community it serves; • where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and • where the green area concerned is local in character and is not an extensive tract of land. <p>S&RNP Schedule 1 sets out justifications for the sites identified as LGS.</p> <p>Cumulatively, the identified Local Green Spaces, many of which are co-joined, form an extensive tract of land, some of which is arguably of debateable significance in the context that the designation is not meant to apply to most open space.</p> <p>This concern is exacerbated by the fact that the Plan does not currently demonstrate the achievability of the required quantum of housing.</p> <p>To better conform with the NPPF, it is recommended that the Neighbourhood Plan designates a reduced number of spaces as LGS, focusing on those that are clearly 'demonstrably special' and meet a high proportion of the NPPF paragraph 77 stipulations.</p> <p>In light of the sheer extent of land identified, the case for sites GS01, GS02, GS08, GS09, GS10 and GS11 is less compelling when assessed against the full extent of NPPF paragraph 77 criteria. Furthermore, GS02 is considered, in the context of the scale of the settlement, to be an extensive tract of land.</p> <p>It is worth highlighting that Core Strategy policy CO3 offers protection to existing public open spaces and recreation areas and policy EN5 to existing habitats and Biodiversity Opportunity Areas (with many of the proposed LGSS within the Rother, Brede and Tillingham Woods BOA).</p> <p>It is also noted that the connecting areas between GS05 and GS16 co-join and cumulatively form a very substantial tract of land (whilst acknowledging that some individual parcels within the area may have some merit as LGS).</p> <p>Proposed Amendments: It is recommended that: a) the merits of the areas put forward for LGS designation be reviewed to avoid coverage of extensive tracts of land and to only include those of that are demonstrably special, and b) consideration be given to incorporating those areas that form part of the open valleys of the River Rother Valley and its tributaries, including the River Darwell Valley in a separate policy that sets out the importance of protecting the landscape setting of the valleys through the village, possibly also making reference to the Rother, Brede and Tillingham Woods BOA.</p>		

Representations

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ROB/R16/2017/32h	Dr Anthony Leonard	Rother District Council	N/a	N/a	Object	EN3			<p>The significance of gaps between settlements is referred to in the policy and paragraph 3.3. It is understandable that local people would want to maintain the open low lying area between Robertsbridge and Northbridge Street and this is set out in the Council's Landscape Assessment. However the capitalised reference to "Gap Between Settlements" implies a formal designation and defined area, which is not put forward in the landscape assessment, nor in the S&RNP.</p> <p>The RDC Core Strategy 'Market Towns and Villages Landscape Assessment' (August 2009) stated: <i>'It is important to retain the gap between Robertsbridge and Northbridge Street settlements. The character of the area is as open flood plain and further development would encroach into the green infrastructure around the village.'</i></p> <p>Support the policy, subject to the following amendment/clarification: Amend the second sentence to remove unnecessary capitalisation and read: 'Proposals which preserve the open character of important gaps between settlements and which are not detrimental to the Green Infrastructure Network (as identified by RDC) will also be supported.'</p> <p>Also, refer to Core Strategy policies EN2, EN5, EN6, EN7, SRM2 in the Conformity List of References</p>		
ROB/R16/2017/32i	Dr Anthony Leonard	Rother District Council	N/a	N/a	Comment	EN4			<p>This policy overlaps with RDC Core Strategy policies EN1, EN5 and emerging RDC DaSA policy DEN4. Core Strategy policy EN5 is a notable omission from the conformity list of references.</p> <p>It is noted that this policy does not promote biodiversity enhancements, which Local Plan policies do. Conversely, the last sentence may have inappropriate implications for the redevelopment of overgrown, brownfield sites. The title of the policy is misleading, (implying energy, water, etc.); when, in fact, it is concerned with landscape and ecological networks.</p> <p>Although the policy is not considered to add particular value to Local Plan policies and, in some respects, is less ambitious, these are not considered to be so significant to warrant proposing policy amendments. However, the supporting text should be amended by the addition of a cross-reference to Local Plan Core Strategy policies EN5 and EN1.</p> <p>This policy is supported subject to the following amendment to the supporting text: At the end of paragraph 3.3.4 add <i>'The above policy should be read in conjunction with Local Plan Core Strategy policies EN5 and EN1.'</i></p>		
ROB/R16/2017/32j	Dr Anthony Leonard	Rother District Council	N/a	N/a	Object	EN5			<p>It should be noted that Rother's emerging DaSA Local Plan (Policy DRM1) proposes to apply the higher water efficiency standard, with all new dwellings required to be designed to achieve water consumption of no more than 110 litres per person per day.</p> <p>Part 1 of the S&RNP policy EN5 is less clear in its expectations and may be taken as not applying the higher water efficiency standard which is consistent with the whole District being identified as under 'serious water stress'. The implications of parts 2 and 3 are not clear, while parts 4 and 5 are covered by the Building Regulations; hence, the policy does not add value in those respects.</p> <p>It is recommended that either:</p> <p>a) Policy EN5 is amended by replacing part 1 with the following: <i>'1. effective use of resources and materials by minimising CO₂ emissions and minimising water use through application of the higher water efficiency standard;'</i></p> <p>Or</p> <p>b) Policy EN5 is deleted</p>		
ROB/R16/2017/32k	Dr Anthony Leonard	Rother District Council	N/a	N/a	Object	EN6			<p>The sentiment of the policy is supported, although essentially repeats national guidance regarding heritage assets</p> <p>Also the wording only refers to <i>'any monuments that may be scheduled or conservation areas that may be designated'</i> which implies the policy does not cover those that already exist.</p> <p>It is recommended that either:</p> <p>a) Policy EN6 be amended as follows: Replace <i>'any monuments that may be scheduled or conservation areas that may be created'</i> With <i>'scheduled ancient monuments or conservation areas'</i></p> <p>OR</p> <p>b) Policy EN6 be deleted, since it replicates national guidance.</p>		
ROB/R16/2017/32l	Dr Anthony Leonard	Rother District Council	N/a	N/a	Object	EN7			<p>As drafted, the policy only refers to Schedule 2 which contains a list of all the Listed Buildings (and one scheduled ancient monument) in the parish. In this event, the words 'or buildings or structures of character' seem inappropriate and suggests a wider scope.</p> <p>Perhaps the policy means to say schedule 2 and schedule 3?</p> <p>If it is meant to have a wider application – presumably to 'non-designated heritage assets' in NPPF terminology, then that terminology should be used.</p> <p>Also, in this event, it is noted that non-designated heritage assets are not afforded the same weight in protection as listed buildings. Combining within the same policy potentially causes confusion. National policies are already in place regarding Listed Buildings.</p> <p>It is recommended that either:</p> <p>a) Policy EN7 be amended by deleting ' or the buildings or structures of character' and replacing with 'and Scheduled Ancient Monument'</p> <p>OR</p> <p>b) Policy EN7 be deleted, but Policy EN8 be expanded to embrace non-designated heritage assets, using terminology to be consistent with the NPPF.</p>		
ROB/R16/2017/32m	Dr Anthony Leonard	Rother District Council	N/a	N/a	Object	EN8			<p>The submitted Neighbourhood Plan sets out a local list, as well as the intention to work with the Local Planning Authority in identifying any other suitable buildings.</p> <p>However, Historic England's (HE) Advice Note 7: 'Local Heritage Listing' sets out the process for local listing. This guidance states that work in preparing a neighbourhood plan may indicate sites that merit inclusion on the 'local list', which needs to be ratified by the LPA.</p> <p>Furthermore, should a formal 'local list' be pursued, the HE guidance also sets out that there needs to be clear nominations process, more detailed 'descriptions of significance' of assessed sites and thresholds for inclusion on the list. A focused consultation process is also advised, including and owners of proposed inclusions.</p> <p>Therefore, at present, and not to 'undo' the useful work undertaken by the Parish Council in highlighting buildings and structures that are regarded as locally important in historic terms, it is considered that the identification of buildings in Schedule 3 can be supported if the terminology in the policy is amended so as to remove the title 'local listing'.</p> <p>The policy fairly acknowledges that the 'list' in Schedule 3 may not be exhaustive. Indeed, other buildings are identified as notable in the earlier Conservation Area Character Appraisal. There may also be other buildings that may warrant identification as non-designated heritage assets (see also comments on Policy HO3).</p> <p>The policy refers to the 'Salehurst and Robertsbridge Character Assessment', but it is assumed this means the Salehurst and Robertsbridge Character Appraisal (The title which appears on the report in the S&RNP evidence base). Reference should also be made to the RDC 'Robertsbridge & Northbridge Street Conservation Area Appraisal'.</p> <p>It is proposed that Policy EN8 be amended as follows: (Proposed deletions struck-through, proposed new text in red italics)</p> <p>Policy EN8: Locally important historic listing of buildings and other structures locally listed Buildings listed in Schedule 3 and identified on Map 13 or otherwise identified by Rother DC as non-designated heritage assets and other key buildings or structures which are of significant local architectural and historic interest and contribute to the Parish's distinctiveness, will be conserved in a manner appropriate to their significance. Development proposals will be expected to retain and enhance the local distinctiveness of locally listed such buildings and structures and their setting. The Robertsbridge & Northbridge Street Conservation Area Appraisal, the Salehurst and Robertsbridge Character Assessment Appraisal and historic environment study (see evidence base) will be used as a reference to assess the impact of the proposals.</p>		
ROB/R16/2017/32n	Dr Anthony Leonard	Rother District Council	N/a	N/a	Object	EN9			<p>The District Council advises that the concept of locally listed trees is not a recognised planning term and should not be used. Schedule 4 is however a useful appraisal of trees and hedgerows and can inform the basis for any further TPOs that may be warranted.</p> <p>It is proposed that Policy EN9 be amended to read: <i>'Planning permission will not be granted where development would result in an unacceptable loss of, or damage to, existing trees or woodlands or hedgerows during or as a result of development, unless the benefits of the proposed development outweigh the amenity value of the trees or hedgerows in question. Wherever possible development proposals must be designed to retain trees or hedgerows of good arboricultural and/or amenity including those specifically identified in Schedule 4.'</i></p> <p>Minor Comment: As with Policy EN8, the policy refers to a 'Character Assessment'. Again, presumably this means the Character Appraisal?</p>		
ROB/R16/2017/32o	Dr Anthony Leonard	Rother District Council	N/a	N/a	Object	HO1			<p>There is an accepted need to define the proposed 'development boundary' for Robertsbridge through a policy, which this fulfils.</p> <p>As the policy states, the purpose of a development boundary is already set out in RDC's own Local Plan documents (as HO1 acknowledges).</p> <p>It is noted that a development boundary does not just relate to housing. As the development boundary policy, if it is considered necessary at all, then it should apply to the whole of the plan, and therefore could sit outside of the housing chapter of the Plan. An alternative is to expand the supporting text to acknowledge this.</p> <p>Support the policy subject to the addition of the sentence currently in Policy HO2 regarding infill development (see comments on that policy).</p> <p>Amend the supporting text by the addition of a sentence at the end of 3.4.1 to read: <i>'The definition of the development boundary has particular significance in relation to the location of housing, but is also relevant to the location of other new development.'</i></p>		

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ROB/R16/2017/32p	Dr Anthony Leonard	Rother District Council	N/a	N/a	Object	HO2			<p>This policy is regarded as largely contextual explanation, with the exception of the final sentence. The first three sentences are already covered by the supporting overleaf table. The reference to infill development relates more to the definition of the development boundary in policy HO1. While it is informative to state that 'Additional allocations will be made if the identified housing sites do not proceed and the SRNDP will be reviewed at least every 5 years to ensure deliverability of the allocations', this would require a plan review. Moreover, it is the role of the plan to have sufficient evidence to be confident that the identified sites will deliver the numbers required; if there is not confidence that the proposed allocations will progress or not deliver the housing numbers set out (see also comments on Policy HO3), then this may need to be addressed earlier than 5 years hence. The words 'at least' may deal with this if there is considered to be a reasonable prospect of the housing numbers being achieved at this time – see comments on Policy HO3.</p> <p>It is proposed to amend Policy HO2 as follows:</p> <p>a) Delete the first three sentences.</p> <p>b) Insert the fourth sentence in policy HO1</p> <p>c) Amend the fourth sentence as follows: (Proposed deletions struckthrough, proposed new text in red italics) <i>Additional allocations will only be made if the identified housing sites do not proceed and the SRNDP will be reviewed at least every 5 years to ensure deliverability of the allocations.</i></p> <p>Recommended non-material amendment: The table at 3.4.2 would usefully be updated to have 1/4/16 as its baseline date.</p>		
ROB/R16/2017/32q	Dr Anthony Leonard	Rother District Council	N/a	N/a	Object	HO3			<p>The Neighbourhood Plan expects the following sites to deliver in excess of the 130 units required; from the following sites for housing development (which total 150):</p> <ul style="list-style-type: none"> • a) Mill Site (approximately 100 units) • b) Heathfield Gardens (approximately 40 units) • c) Vicarage Land (approximately 10 units) <p>However, the estimated capacities for individual sites are not considered achievable in light of environmental and heritage constraints. This could be compounded by the requirements of other policies within the Submission Neighbourhood Plan, notably parking standards, if these were carried forward as drafted (see also comments on policies HO5 and IN2). Although a "red line" definition of sites can be sufficient, it is evident that there are considerable constraint (and opportunities) affecting the sites. Ideally layout principles and design criteria would be set out for each site. Without this, the supporting information demonstrating deliverability of sites needs to be particularly scrutinised. Overall, it is found that the quantum of residential development on the sites, most significantly on the Mill Site is highly optimistic. The reasoning behind this view is set out in relation to each of the three proposed allocations below.</p> <p>Mill Site Notwithstanding this Council's previously expressed concerns that the site cannot realistically accommodate some 100 dwellings without compromising the character and setting, and/or exacerbating flood risks, bearing in mind that a significant part of the site lies within flood zone 3 (the zone of highest risk), the NP still expects this number to be accommodated. However, it has not been demonstrated, on reasonable assumptions, that the Mill site is capable of achieving this.</p> <p>Also in relation to flood risk, the Council has raised concerns about the inconsistency of policy IN8 with the sequential test for flooding set out in the NPPF. The S&RNP needs to satisfactorily demonstrate application of the NPPF's sequential test to justify residential development within Flood Zone 3. There is no explicit sequential testing and, while the sequential test can be demonstrated through a Strategic Environmental Assessment (SEA) process and the S&RNP includes a supporting SEA, it is not considered that this presents a sufficiently robust case to demonstrate that there are sustainability benefits of developing the extent of the Mill site to outweigh flood risk. The SEA assessment of sites acknowledges that the Mill sites scores negatively in relation to flooding, but also shows other sites not within flood zone 3 (though not wholly free of other constraints) that appear as reasonable alternatives, scoring positively in relation to flooding.</p> <p>Given that the developable area of the site outside Flood Zone 3 only amounts to approximately 1.9 hectares, it is readily apparent that the scale of residential development anticipated by the S&RNP could not be accommodated in that part of the site alone, even if it could be demonstrated that the residential use of the Mill building itself passes the exception Test. This is also before consideration is given to the requirements for SuDS within the site to manage run-off (particularly important at this river bank location to avoid negative effects on the aquatic environment).</p> <p>As appears the case, if it is necessary to locate development, particularly more vulnerable residential uses, within Flood Zone 3 in order to achieve some 100 dwellings, this will need to be set out in line with national guidelines and be subject to Environment Agency approval.</p> <p>The local planning authority therefore awaits Environment Agency input and conclusions as to the application of national tests regarding flood risk, which will in turn inform the realistic capacity of this site. Separately, the Council draws attention to the strategic policy (Core Strategy policy EC3) to retain and make effective use of employment sites where possible. This is supported by the recent Employment Sites Review. Of course, the Mill site has a legacy of employment use and, as a Rural Service Centre, well situated to serve a wider rural catchment and adjacent to the A21 Trunk Road and on the Hastings to London mainline railway, Robertsbridge offers an appropriate location for further employment space.</p> <p>It is appreciated that the S&RNP provides positive support for businesses in the countryside and home working. At the same time, it remains a concern that, if economically viable, bespoke workspace is not specifically provided for in the Plan. Given the scale and location of the Mill site, the Parish Council is asked to reconsider whether there is a realistic prospect, having regard to likely demand and site viability, of providing at least some element of business (B class) within the site. It is noted that employment uses fall within the less vulnerable category in terms of flood risk test, so again subject to EA advice, may be incorporated without impacting on housing capacity. Very recently, the Council has received a planning application for 98 dwellings on the site, which has not yet been validated at the time of writing. The Council's comments on the Neighbourhood Plan are without prejudice to the Council's view on this on any planning application. It is appreciated that the detailed scrutiny of forthcoming schemes, including advice from statutory bodies as well as officer assessments of proposals, will further inform the position.</p> <p>However, at this point, the Council cannot reconcile the Plan's approximate capacity with the flood risk constraints, as well as with the strategic expectation of accommodating employment development. A holding objection is therefore made to the reference to the Mill Site in Policy HO2, pending application of the sequential test to the Plan to demonstrate the suitability and capacity of the Mill site in light of flood constraints and Environment Agency consideration.</p> <p>In addition, the Parish Council is asked to reconsider whether there is a realistic prospect, having regard to likely demand and site viability, of providing at least some element business (B class) within the site, having regard to the Core Strategy policy EC3.</p> <p>Heathfield Gardens The S&RNP estimates capacity as approximately 40 units. It is noted that the RDC SHLAA estimated capacity of 25 across the same area. It is considered to have constraints to high densities, including:</p> <ul style="list-style-type: none"> • Sloping topography, combined with the likely need to provide SuDS across the low lying northern edge in order to avoid increasing flood risk elsewhere (which would be contrary to the NPPF), particularly lower lying residential properties to the north. • The presence of historic field boundary centrally dividing the site. <p>An indicative layout was provided during a previous consultation. This showed 40 dwellings, although it had a high proportion of smaller units (47.5%), more than Core Strategy policy LHN1 would require (30%), while the relevant proposed S&RNP policy (HO5) is even less prescriptive. Also, developers are likely to seek to serve the commuter market that exists. It is also likely that the layout shown may require more extensive SuDS and be considered unduly prominent on the eastern boundary.</p> <p>However, the scheme illustrates that, also by extending slightly further south, that a greater number than the SHLAA is reasonable. On this basis, the Council considers an estimated site capacity of 35 is a best estimate, with 38 as an upper extent if there is a commitment to a high proportion of smaller units. In order to demonstrate deliverability of the desired number, the Neighbourhood Plan may benefit from stipulating a proportion of smaller units (1 or 2 beds) in accordance with the layout provided.</p> <p>Proposed Amendment: Set capacity at approximately 35 (or 38 if there is a requirement for a high proportion of smaller units).</p> <p>Vicarage Land</p>		

Representations

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									<p>The S&RNP identifies capacity of approximately 10 units. It is assumed that the existing vacant Vicarage may be demolished. The Mission Hall on the site is considered below. Access is off Fair Lane. The site has a number of constraints affecting its capacity and the nature of development. It is located within the Conservation Area with multiple listed buildings in close proximity. Access is considerably sub-standard. These constraints are potentially exacerbated by the elevated topography of the site relative to its surroundings. This also raises potential issues in relation to the amenity of adjoining residences. Regarding highways, whilst the Council considers levels to be a potential issue, with the present alignment unsuitable for larger vehicles to navigate, it is noted that the Highways Authority have commented that the site cannot be ruled out on a highways basis. However, further investigation is considered necessary to demonstrate the site is accessible and deliverable. Therefore RDC acceptance of this site is conditional on the Highways Authority not raising an objection.</p> <p>The potential loss/conversion of the chapel building raises conformity issues with Core Strategy policy CO1(iii), as it is a community building. Also, there appears merit, subject to further assessment, of identifying the Robertsbridge Mission Room as a non-designated heritage asset. It is a Church of England place of worship under the jurisdiction of the Diocese of Chichester and the building appears to be a late Edwardian mission hall, with a character associated with that particular building typology, complete with bell in the northern gable. Therefore, for the purposes of consideration of site capacity, it is assumed that the chapel building will remain in such use.</p> <p>There are a number of private accesses, including on its western boundary gates to the rear gardens of a number of the properties on High Street, and, to the north of the former vicarage, a vehicular access track to Wesley Cottage to the east of the site (Wesley Cottage is an early Victorian cottage, which may also be considered as a non-designated heritage asset).</p> <p>Fair Lane is very narrow, the width restricted in the most part to single lane by parked cars. It also has a sub-standard footway. There is the potential for the site to provide an alternative pedestrian route to the village centre/school/hall by a link through the site directly to footpath 45b.</p> <p>Having regard to the very limited capacity of Fair Lane for further traffic, the potential for low traffic-generating developments has been considered. It is noted that the supporting S&RNP „Housing Report”, as well as previous evidence work carried out for RDC, identifies a likely need for sheltered accommodation within the village. S&RNP Policy HO5 also requires bungalows on sites. Also, the elevated nature of this site is such that bungalows would reduce the risk of negative impacts upon the surrounding, lower-set listed buildings and the Conservation Area.</p> <p>For the above reasons, the site lends itself to a sheltered/bungalow scheme.</p> <p>Even so, given the site constraints, the identified number (10) is considered overly ambitious. However, if a scheme is as set out above, a scheme of 7 bungalows (a net gain of 6 dwellings) is regarded as achievable subject to Highways Authority confirmation of access. However, a standard purely two-storey housing scheme is unlikely to achieve the threshold of 6 net additional dwellings without exacerbating highways and congestion concerns in the area, in view of the additional vehicle movements typically generated.</p> <p>Proposed Amendment: Amend capacity of the Vicarage Land to 7 (net gain 6), subject to Highways Authority confirmation of access and set out the justification for a sheltered/bungalow scheme.</p> <p>Sub-Provisions</p> <p>The Sub-provisions potentially overlap / contradict with existing national and local policy requirements.</p> <p>Specifically, an odour assessment is not considered appropriate for every development application, although it is appreciated there may be some merit in applying it to applications in the vicinity of the sewerage treatment works.</p> <p>The current RDC approach to archaeology is based upon the County Archaeologist advice and the national requirements set out in the NPPF; and it is not appropriate to have a divergent set of criteria applied to one Parish.</p> <p>Proposed Amendments: Remove criteria 5 and 7 as they are covered elsewhere by local and national requirements and amend criterion 6 to only apply within close proximity of the sewerage treatment works.</p> <p>NB In the light of the above assessments of realistic capacities of individual sites, unless the Environment Agency and the Lead Local Flood Authority favourably comment on residential development being accommodated within Flood Zone 3 on the Mill Site, having regard to the sequential and exception tests, it is reluctantly concluded that the proposed allocations fall materially short of the housing target for Robertsbridge, contrary to the strategic policies of the Council.</p>		
ROB/R16/2017/32r	Dr Anthony Leonard	Rother District Council	N/a	N/a	Object	H05			<p>The Parish Council needs to be mindful that S&RNP Policy HO5 will replace RDC Core Strategy policy LHN1, with the latter requiring 30% 1&2 bedroom properties, a requirement derived from background evidence relating to housing need. The fact that S&RNP Policy HO5 does not require a specific proportion of smaller dwellings may result in developments with less smaller dwellings compared to what would be expected elsewhere in Rother. This is also an issue that may affect the likely capacity on sites, so relates to the concerns with Policy HO3.</p> <p>The 'Housing Report' in the supporting evidence does highlight a strong need for 2 bedroom properties (cited by 56% of respondents) and 3 bedroom (54%). However, when translated into policy HO5, the requirement is simply to include two and three bedroom dwellings within schemes, but without a specific proportion requirement. Given the market tendency to favour larger dwellings, it may prove difficult to achieve the significant increase in two bedroom dwellings that the S&RNP appears to suggest is needed.</p> <p>In respect of sheltered accommodation, it is accepted that there is some evidence of a need for such accommodation in rural centres. However, it may not be a practicable requirement on every scheme, as the policy requires. Regarding bungalows, the „Housing Report” in the supporting evidence infers a need for bungalows, while the demographic trend, as well as existing age profile, suggests a likely demand for single storey dwellings.</p> <p>Support Policy HO5 subject to the following amendments: (Proposed deletions struck-through, proposed new text in red italics)</p> <p>Housing developments within the development boundary of Salehurst and Robertsbridge will be permitted where they include a range of house types, including a high proportion of one, two and three bedroom dwellings; and normally including an element of single level dwellings and where practicable, sheltered accommodation to meet the needs of the elderly and people with disabilities.</p>		
ROB/R16/2017/32s	Dr Anthony Leonard	Rother District Council	N/a	N/a	Object	H06			<p>The Government's PPG indicates that no on-site affordable housing provision can be required on sites of 10 or less dwellings, although financial contributions can be sought on sites of 6-10 dwellings in the AONB (subject to an 'opt in' through planning policy).</p> <p>Hence, Policy HO6 runs counter to the PPG insofar as sets a threshold of 6 dwellings for on-site affordable housing.</p> <p>There may be a local case for departure from the PPG and RDC is reviewing its policies across the District. Indeed, house prices in this part of Rother are the highest in the District. Even so, it is likely that a more substantial case is needed. Moreover, there is no evident viability evidence to support this more onerous policy.</p> <p>Given that the large majority of the new dwellings will be on larger sites under the Plan, the additional contribution of affordable dwellings from sites of 6-10 dwellings does not appear significant.</p> <p>The reference to a „financial contribution” is vague, while the District Council has an approved methodology for calculating such contributions. Hence, this element of the policy may undermine the district-wide policy and prove less effective.</p> <p>Also 'Lower cost' and 'Affordable ownership lower cost' (referenced in the title of the policy and in the second sentence) are not correct terms for affordable housing as termed in the NPPF.</p> <p>It is proposed that Policy HO6 be deleted, but textual cross-reference be made to the District Council policies, notably LHN2, and guidance.</p>		

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ROB/R16/2017/32t	Dr Anthony Leonard	Rother District Council	N/a	N/a	Comment	H08			This policy might better sit in the Infrastructure section rather than in Housing chapter. Non material minor amendment: It is suggested that the policy be moved from the Housing Chapter to the Infrastructure section.		
ROB/R16/2017/32u	Dr Anthony Leonard	Rother District Council	N/a	N/a	Object	IN1			This policy appears to require more stringent approach than the ESCC Highways Authority requirement (parking calculator). The highway authority has confirmed that they do not support an arbitrary localised standard and that reference should only be made to the ESCC parking calculator and 'Guidance for parking at new residential development'. The District planning authority echoes the Highways Authority's concern. Also, this policy could be an unrealistic constraint on layout for smaller houses, as well as having inevitable implications for the achievable plot density and, hence, site capacities. Policy IN1 may also be seen to encourage car dependency in a village which enjoys comparatively good public transport links, including a train station. This raises issues of sustainability. There seems to be insufficient evidence to justify a local departure from the County Highways Authority's approach to parking which already calculates requirements taking into account local circumstances. It is proposed that Policy IN1 be deleted and, instead, reference be made in supporting text to the need for development to comply with the ESCC parking calculator and the ESCC 'Guidance for parking at new residential development'.		
ROB/R16/2017/32v	Dr Anthony Leonard	Rother District Council	N/a	N/a	Comment	IN2			This policy is rather broad or inflexible as an approach. Applied rigorously, it may limit scope for home-zones and shared surfacing. Although the „and/or“ introduces an ambiguity and it is unclear how this should be applied in practice – can off-street parking replace on-street? e.g. Does it require new on-street or off-street parking to compensate for loss of on-street parking resulting from the creation of an access? The policy IN2 be supported subject to the following amendment: (Proposed deletions struck-through, proposed new text in red italics) 'Development proposals that would result in the overall net loss of existing on-street and/or off-street car parking will not <i>generally</i> be supported.' Non-material amendment: There is a typo 'sissue' in the supporting paragraph 3.5.2.		
ROB/R16/2017/32w	Dr Anthony Leonard	Rother District Council	N/a	N/a	Support	IN4			This policy is supported .		
ROB/R16/2017/32x	Dr Anthony Leonard	Rother District Council	N/a	N/a	Support	IN5			This policy is supported .		
ROB/R16/2017/32y	Dr Anthony Leonard	Rother District Council	N/a	N/a	Object	IN6			Policy IN6 appears to essentially cover the same subject matter as policy EC2, so it may be advantageous to combine into a single policy. The final sentence of IN6 is problematic – "In the case of designated development sites the Plan will require the installation of super-fast or ultra-fast fibre services to all the premises on site." The provision of superfast broadband, while supported by the Council, is dependent on the private sector. The inclusion of broadband in some planning policies and strategies ranges from a desire to grow the rural economy of the area, improve accessibility, reduce carbon emissions through the need to travel and improving social inclusion. However, none of these policies are mandatory and therefore cannot compel developers to install high speed broadband infrastructure on new developments, although there is scope to require ducting. It is also not clear why the requirement is only for 'designated' (does it mean 'allocated'? development sites, and not all sites – including windfalls). Amend policy to read: (Proposed deletions struck-through, proposed new text in red italics) Applications for residential development must contain a 'Connectivity Statement' which entails <i>contains</i> details of the communication infrastructure being provided and will provide for <i>assesses scope for, and cost of, providing suitable ducting to enable high speed connectivity.</i> more than one service provider to provide a fibre connection to individual properties from connection chambers located on the public highway, or some alternative connection point available to different service providers. In the case of designated development sites the <i>Subject to viability and feasibility</i>, the Plan will require the installation of <i>super-fast or ultra-fast fibre services to all the premises on site. infrastructure (ducting) capable of providing high speed fibre services to premises on all larger development sites.</i>		
ROB/R16/2017/32z	Dr Anthony Leonard	Rother District Council	N/a	N/a	Comment	IN7			This policy substantially overlaps with Core Strategy IM2. It is therefore questioned whether IN7 is necessary. Also, CIL regulations require that any development contributions and necessary, related to the development and proportionate. The wording of the policy leaves some ambiguity as to whether it meets these tests. However, as the policy cannot usurp legal tests, it is not regarded as a key issue. No comment		
ROB/R16/2017/32aa	Dr Anthony Leonard	Rother District Council	N/a	N/a	Object	IN8			The policy is poorly worded and potentially confusing. The first sentence suggests that development proposals within areas of flooding will be supported subject to mitigation measures. The addition of 'unless' at the end of the first sentence is ambiguous – i.e. does this check refer to the support for development or the requirement for the mitigation measures? The wording and emphasis of the 3 subsequent bullets suggest the former. In which case the first bullet is problematic - There is no national policy stipulation that minor housing or commercial extension do not need to consider flood risk. The whole policy emphasis of effectively supporting development in flood risk areas (subject to mitigation) arguably by-passes the national sequential and exception test, raising issues of non-compliance with NPPF paragraphs 100-102. In particular, development proposals within areas of flooding are required to meet these national tests, regardless of local improvements/mitigation. The first sentence does not reflect this. In addition, the requirement for development to mitigate risk 'across the parish' has no precedent in national and local policy and is almost certainly unachievable in practice, as well as an unreasonable burden on an individual development. The policy covers both fluvial flood risk and surface water run-off and potentially blurs the issues. In particular, bullets 2 or 3 appear to suggest development in a fluvial flood zone may be acceptable if it has no detrimental impact on surface water, is self-sufficient in managing surface water run-off. However, there are no such provisions in national policy. NPPF (paragraph 103) ensures that flood risk is not increased elsewhere when determining planning applications. The second half of this policy, and bullet 2, is therefore largely unnecessary. In any event, part 2 of the policy applies to 'all developments' which appears inconsistent with part one of the same policy which does not apply to minor housing developments. In relation to drainage it is noted that not all drains and watercourses are on public land and often are the responsibility of the riparian landowner, while SuDS are increasingly under the control of a management company. It is further noted that the policy does not refer to the maintenance of the drainage system. Given that the wording is ambiguous and does not sit comfortably with national policy nor emerging Local Plan policy on the matter, it is recommended that Policy IN8 is deleted. Replacement text could usefully refer the East Sussex Local Flood Risk Management Strategy 2016 – 2026 and relevant guidance.		

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ROB/R16/2017/32bb	Dr Anthony Leonard	Rother District Council	N/a	N/a	Object	LE2			<p>This policy substantially repeats Core Strategy policies CO1 and CO3. It is not considered to add value to those.</p> <p>Aside from that, it is not clear if an applicant would need to fulfil all 3 criteria or just one (i.e; use of the terms and/or). The addition of the word 'and' between 2 and 3 implies like for like alternative provision is included in the development proposal itself, in addition to demonstrating that suitable alternative provision already exists in the immediate area to serve the community. It is believed that, if the policy is retained, the 'and' should be at the end of bullet 1, rather than bullet 2.</p> <p>If retained, it may help to define the use classes to which the policy applies. For example; the equivalent Core Strategy policy CO1 states '<i>For the purposes of defining Community Facilities and Services, The definition of ranges from basic health and social services to education, arts, culture and religious facilities (categorised as C2, D1 and D2 in the Use Classes Order 2005)</i>'.</p> <p>Suggested amendment is to either: a) Delete the policy OR b) Put 'and' at end of bullet 1. Replace 'and' with 'or' at the end of bullet 2.</p>		
ROB/R16/2017/32cc	Dr Anthony Leonard	Rother District Council	N/a	N/a	Comment	LE3			<p>Suggested non-material amendments:</p> <p>The policy reference to run-off sits out of place here, could this not be better dealt with under a policy relating to flooding etc?</p> <p>The title could clarify - New 'Leisure or Community' facilities</p>		
ROB/R16/2017/32dd	Dr Anthony Leonard	Rother District Council	N/a	N/a	Object	Strategic Environment Assessment (SEA)			<p>Overall, the SEA has been produced so as to be consistent with the RDC screening assessment and consistent with the RDC framework, which is welcome. It is considered to be a proportionate assessment. However there are some issues with scores as highlighted below:</p> <p>Vicarage site The positive score for Objective 4: Built environment is questioned: – Given the topography combined with the location within the Conservation Area and adjacent to listed buildings, this is a high risk site in terms of impact on built environment. Proposed Amendments: Amend Objective 4 to a 'to be determined' – dependent on layout.</p> <p>Mill Site & Grove Farm Objective 3 access to services: The positive score of the Mill site, relative to the neutral score for Grove Farm is extremely hard to justify given their relative proximity to the village core, even allowing for the proposal to provide a footpath to the train station. For example: Primary School: Walking Distance to Grove Farm Phase 1: 220m; to Mill Site: 821m Convenience Shop (One Stop): Walking Distance to Grove Farm Phase 1: 312m; to Mill Site: 601m Train Station: Walking Distance to Grove Farm Phase 1: 625m; to Mill Site: 1062m (estimated 800m in the event of a new footpath being provided between the Mill and the train station) GP Surgery: Walking Distance to Grove Farm Phase 1: 460m; to Mill Site: 914m (estimated 860m in the event of a new footpath being provided between the Mill and the train station)</p> <p>Objective 7: The positive score for the Mill site in relation to water resources is hard to justify given the risk of run-off to the water course.</p> <p>Proposed Amendments: Amend SEA accordingly.</p>		
ROB/R16/2017/32ee	Dr Anthony Leonard	Rother District Council	N/a	N/a	Comment	Environment 1.4.11-1.4.12			<p>Environment</p> <p>Sections 1.4.11 to 1.4.12 describe the District as a whole and not Robertsbridge specifically. Rother DC has previously provided extensive material relating to the local environmental situation and context.</p> <p>Suggested non-material amendment: Include locally specific, rather than District wide environmental information.</p>		
ROB/R16/2017/32ff	Dr Anthony Leonard	Rother District Council	N/a	N/a	Comment	Mapping			<p>Several maps are included that were produced by RDC for the old Robertsbridge Village Study.</p> <p><u>Maps</u> Map 6 – Flood Risk is Out of date Map 7 – Ancient woodland 2010 out of date (now 2015)</p> <p>Proposed Amendment: Update the mapping (RDC can provide updated maps)</p>		
ROB/R16/2017/33	Rector & Scholars of Exeter College		Mr Wai-kit Cheung	Turnberry Planning Limited	Object	H03			<p>Summary</p> <p>Based on our assessment of the above three sites, the emerging SRNP is considered inflexible/over optimistic and appears to be placing too much emphasis on the three sites to deliver the required housing target up to 2028. This is in the absence of not having undertaken a more detailed exercise in understanding its true housing deliverability in light of obvious site constraints as highlighted in this letter. We consider that a more flexible approach to housing delivery is required and that other sites such as Grove Farm should be reconsidered for allocation in the emerging SRNP in order to help meet the housing target of the village up to 2028.</p> <p>The site selection process has not been undertaken positively, contrary to national guidance, by unallocating Grove Farm, and placing the Neighbourhood Plan under pressure by not being in a position where it can no longer meet the housing needs of the Neighbourhood Plan Area. The Plan is also not in general conformity with the strategic development policies for the area and the adopted Local Plan.</p> <p>We also object to how the above three sites as well as the Grove Farm site were assessed in the Strategic Environmental Assessment (SEA) that accompanied the emerging SRNP. Having reviewed the SEA, we consider the assessment as having significant flaws that fails to meet the basic condition of being compatible with EU obligations. Therefore, we would request the Independent Examiner to undertake a thorough review of this against the 'The Environmental Assessment of Plans and Programmes Regulations 2004' (SI 2004 No. 1633). Our further justifications are set out below.</p> <p>Additional supporting information was supplied which can be viewed here:</p> <p>Robertsbridge Illustrative Layout (http://www.rother.gov.uk/CHttpHandler.ashx?id=28312)</p> <p>Robertsbridge (http://www.rother.gov.uk/CHttpHandler.ashx?id=28313)</p> <p>STRATEGIC ENVIRONMENTAL ASSESSMENT (http://www.rother.gov.uk/CHttpHandler.ashx?id=28314)</p> <p>SALEHURST & ROBERTSBRIDGE NP (http://www.rother.gov.uk/CHttpHandler.ashx?id=28310)</p> <p>Transport Statement - Final 2015 (1) (http://www.rother.gov.uk/CHttpHandler.ashx?id=28315)</p>		

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Respondent Details		Agent Details (if applicable)		Part of the Salehurst & Robertsbridge Neighbourhood				Comment Full	Indicated a specific reference to participate in oral examination	Requests to be notified when the council resolves to 'make' the Robertsbridge and Salehurst
Respondent Name	3982 Organisation (if applicable)	Agent Name	Organisation (if applicable)	Document (Support/Object/Comment)	Policy No.	Paragraph No.	Page No.			
ROB/R16/2017/33a	Rector & Scholars of Exeter College		Mr Wai-kit Cheung	Turnberry Planning Limited	Object	SEA (Strategic Environmental Assessment)		<p>Strategic Environmental Assessment</p> <p>The emerging SRNP is accompanied by a Strategic Environmental Assessment (SEA) – ‘Environmental Report’ (published in December 2016). In a letter from the LPA dated 15 June 2016, it confirmed that an SEA would be required in support of the emerging SRNP as it ‘is likely to have significant effects on the environment’. In particular, the letter from the LPA highlighted that the SRNP should have due consideration for the following:</p> <ul style="list-style-type: none"> • The area of the SRNP is wholly within the High Weald AONB and enjoys the highest degree of protection in relation to landscape and scenic beauty. • There are many key features of the AONB within the Parish including historic field boundaries, historic routeways etc. • There are significant heritage constraints including two conservation areas, significant numbers of listed buildings, unlisted buildings of architectural interest, and archaeological notification areas. There are potential direct impacts where sites contain, or lie within these assets, as well as indirect impacts through development in the setting of the assets. • Large swathes of land along the course of the Rivers Rother and Darwell and their tributaries that are within Flood Zones 2 and 3. • The Rother and Darwell Valleys are also identified within the ‘Rother, Brede and Tillingham Woods Biodiversity Opportunity Area’, which overlaps with sites under consideration for development. <p>Having reviewed the SEA, we would like to draw the Independent Examiner to the following:</p> <ol style="list-style-type: none"> 1. The SEA themes make no explicit reference to transport/accessibility or socioeconomics, and the theme dealing with air quality and human health should probably also refer to noise. 2. It is not clear in the SEA whether any alternative sites were assessed and no reasoning appear to have been provided. 3. The three sites put forward in the emerging SRNP for allocation (i.e. Mill Site; Vicarage Land; and Heathfield Gardens) have made it through to satisfy the requirement to accommodate circa 150 homes. The justifications for this (and for rejecting the other 10 sites) have not been explicitly made clear in the SEA. 4. The assessment of policies (Section 7) is very repetitive and generic, whilst the alternative of re-worded policies have not been clarified in the SEA. <p>We also question the validity and robustness of the assessments of the three sites that have been put forward for allocation in the emerging SRNP (i.e. Mill Site; Vicarage Land; and Heathfield Gardens). In addition, we question the objectiveness as to how Grove Farm was assessed in the SEA, in particular, certain elements were considered unfairly ‘marked down’.</p> <p>We have undertaken a comprehensive review of the assessment of the four sites in the SEA and this is contained in Appendix 2. In summary, we have major concerns as to how the four sites have been assessed. The draft Neighbourhood Plan therefore fails the additional test of not complying with EU Regulations. This is a serious legal flaw in the process and needs remedied before the Neighbourhood Plan can progress.</p> <p>In light of the above, we formally request that we are given the opportunity to make oral representations to the Independent Examiner at a public hearing. We trust this letter clearly sets out my client’s position in relation to the consultation document.</p> <p>However, should you have any queries, please do not hesitate to contact me.</p> <p>Additional supporting information was supplied which can be viewed here: STRATEGIC ENVIRONMENTAL ASSESSMENT: http://www.rother.gov.uk/CHttpHandler.ashx?id=28314</p>		

Late Representations

Respondent Details			Agent Details (if applicable)		Part of the Salehurst & Robertsbridge				Full Summary	Willing to participate in oral examination if required?	Wishes to be notified when the council resolves to 'make' the Sedlescombe Neighbourhood Plan?
Respondent ID	Respondent Name	Organisation (if applicable)	Agent Name	Organisation (if applicable)	Document (Support/Object/ Comment)	Policy No.	Paragraph No.	Page No.			
ROB/R16/2017/L1	David Evison	Chichester Diocese	n/a	n/a	Comment	Former Vicarage & Glebe Site Fair Lane			<p>I am writing following a conversation with Stephen Hardy of the Neighbourhood Plan Steering Group. I act for Chichester Diocese and I submitted brief representations regarding the diocese land at Fair Lane under the Reg 14 consultation. I realise that the period for representations under the Reg 16 consultation is now over but I hope the following comments will be helpful on the timing with which it is hoped to bring this site forward.</p> <p>I should say first that the diocese supports the proposed allocation of the site for housing in the draft plan.</p> <p>The site is now redundant (except for limited use of the hall which is in very poor condition). A replacement parsonage has been provided elsewhere in Robertsbridge and the old vicarage is vacant. The diocese wishes to bring the site forward for development at the earliest opportunity.</p> <p>The diocese has commissioned highways consultancy advice to establish and confirm that the access can be improved within land at present within the landowner's control. The diocese has now entered into advanced negotiations with a preferred purchaser and the next stage is likely to be a pre-app meeting with your development management colleagues.</p> <p>I should add that while earlier proposals were for the hall facility to be replaced off-site, current proposals are for redevelopment of a hall on part of the site of the existing hall building. It would not need to be as large as the present building to serve all the existing and foreseeable needs.</p> <p>I hope the above comments are helpful.</p>		Yes
ROB/R16/2017/L2	Rebecca Bishop	Natural England	n/a	n/a	Comment	SEA			<p>Thank you for consulting Natural England on your Neighbourhood Plan and SEA and I apologise for the late submission of this response, which is due to sickness leave.</p> <p>I note that we provided general advice in relation to a previous consultation (Natural England ref. 197218) on 28th October 2016. We have nothing further to add to that advice.</p>		
ROB/R16/2017/L3	Mrs Patricia Hanson		n/a	n/a	Support	Full Plan			<p>The Mill Site is OK. It is time the site was used. I am broadly in accordance with the plan though I regret the extension to the village as I am not sure houses here will affect those who have to travel. "Affordable" housing is good but I doubt many jobs can be found locally.</p>		Yes