Submission Core Strategy Consultation Statement

June 2012

www.rother.gov.uk
This page is intentionally blank
## Contents

1. **Introduction**  
   
2. **Issues and Options Consultation – Consultation under Regulation 25**  
   
3. **Consultation on Strategy Directions - Further consultation under Regulation 25 (and formerly Regulation 26)**  
   
4. **Main issues from the consultation on Strategy Directions**  
   
5. **Further consultation prior to Proposed Submission**  
   
6. **Consultation on the Proposed Submission Core Strategy**  
   
7. **Consultation relating to the Focused Amendments to the Proposed Submission Core Strategy**  
   
### Appendices

- **Appendix 1**  
  Extract from the Statement of Community Involvement  
  
- **Appendix 2**  
  August 2006 Consultation on SA Scoping Report  
  
- **Appendix 3**  
  January – February 2008 Scoping Report Consultation  
  
- **Appendix 4**  
  Consultation with Natural England on Appropriate Assessment Screening Report  
  
- **Appendix 5**  
  Representations received to the Issues and Options document, Questionnaire findings, Core Strategy Policy Directions Documents,  
  
- **Appendix 6**  
  Feedback from the residents questionnaire  
  
- **Appendix 7**  
  Cabinet Report  
  
- **Appendix 8**  
  Stakeholder Consultation on Synopsis  
  
- **Appendix 9**  
  Summary of responses to Core Strategy Synopsis Document  
  
- **Appendix 10**  
  Summary of issues arising from Strategy Directions’ representations  
  
- **Appendix 11**  
  Copies of adverts for Strategy Directions’ consultation
| Appendix 12 | Editorial on Strategy Directions | 191 |
| Appendix 13 | Breakdown of representations | 194 |
| Appendix 14 | Bexhill College Event | 199 |
| Appendix 15 | Business Community Workshop | 201 |
| Appendix 16 | Parish Planning Conference | 206 |
| Appendix 17 | Documents available for inspection as part of the Proposed Submission Consultation | 223 |
| Appendix 18 | Copy of Public Notices placed in Battle, Bexhill, Rye and Hastings Observers, 19 August and 30 September 2011 | 224 |
| Appendix 19 | Minutes from Rother District Council Cabinet – 14/05/12 | 233 |
| Appendix 20 | Copy of Public Notice to be inserted in Battle, Bexhill and Rye Observers (15th June 2012) advertising the 6-week public consultation. | 234 |
1. **INTRODUCTION**

**Background**

Following the introduction of the Planning and Compulsory Purchase Act in 2004 which requires local authorities to prepare Local Development Frameworks (LDFs), the Council has been working with the community and stakeholders to produce a Core Strategy Development Plan Document (DPD). This will form part of the Council’s LDF and the statutory ‘development plan’ for the District.

The Core Strategy document sets out the vision and general distribution of development within the District up to 2028. It is a core document in that other local development documents produced as part of the LDF will need to be in conformity with it.

There are a number of formal stages that the Core Strategy must go through in its preparation before it can be adopted. The first public consultation stage was the publication of and consultation on the ‘Issues and Options’ document which suggested amongst other things a number of strategic development options for the District. At that time, the Council had no preconceived view of what options should be pursued.

The second stage of preparation of the Core Strategy produced the ‘preferred options’ or ‘strategic directions’, which considered choices for the vision, objectives, spatial strategy and broad locations for development, these were refined following consideration of the representations received at the Issues and Options stage.

It is noted that while the Town and Country Planning (Local Development) (England) Regulations 2004, as amended by the 2008 Regulations remove the ‘Preferred Options’ stage, the Council decided that further public consultation on its emerging strategy was vital to ensure that it duly reflected specific local needs and priorities, as well as conforming with its adopted Statement of Community Involvement.

The next (third) stage of preparation of the Core Strategy is known as the ‘proposed submission’ stage which is the Strategy the Council proposes to submit in light of comments received at the ‘strategy directions’ stage. The Core Strategy considers key strategic areas for conservation and development, along with spatial strategies for Bexhill, Battle, Rye and the Rural areas, as well as broad, generic topic areas which are important for the District, including housing, environment and economy.

**Format of the Consultation Statement**

This document sets out Rother District Council’s engagement with stakeholders and the community in the preparation of the Core Strategy. It set out early stakeholder engagement, engagement on the Issues and Options report, the Strategy Directions, and further engagement post Strategy Directions as well as the Sustainability Appraisal, the Strategic Environmental Assessment, the Appropriate Assessment and Synopsis on the emerging which has been carried out to date under Regulation
25. This includes details on how individuals and bodies were consulted, the methods of consultation and the Council’s response to comments received.

**Statement of Community Involvement**

The Government’s position on participation in the planning process is referred to in Planning Policy Statement 12, paragraph 4.20: *Local Spatial Planning*. It states that “the production of Core Strategies should follow the Government’s principles for community engagement in planning. Involvement should be:

**Appropriate** - to the level of planning

**From the outset** - leading to a sense of ownership of local policy decisions

**Continuous** - part of an ongoing programme, not a one-off event, with clearly articulated opportunities for continuing involvement

**Transparent and accessible** - using methods appropriate to the communities concerned; and

**Planned** - as an integral part of the process for making plans

These principles must be defined within a Statement of Community Involvement (SCI) which is a document which sets out how the local authority will approach participation during the preparation of plans and programmes. In preparing the Core Strategy the approach set out in the SCI must be followed.

Rother District Council has an adopted SCI which sets out the protocols, process and methods for public involvement in the planning process. It was applied in the consultation process of the Issues and Options Document and to the current Consultation on Strategy Directions document, and will apply to the production of other Development Plan Documents, Supplementary Planning Documents, Sustainability Appraisals and Strategic Environmental Assessments. The SCI lists those individuals and organisations it is considered should be involved in the process of developing planning policy. An extract of the SCI showing these is contained in *Appendix 1*. It is available to view on the Council’s website at [www.rother.gov.uk/ldf](http://www.rother.gov.uk/ldf)

In addition to the SCI, the Council has a Consultation Charter which sets out its principles for public consultation across its services as follows:

*The Council acknowledges and undertakes that:*

*consultation is a fundamental part of good public service; it will be the starting point not an afterthought*

*consultation will be based on openness, trust, integrity and mutual respect for all participants*

*where appropriate consultation will be used to seek views before decisions are made*

*requests to consult may come from inside or outside the Council*

---

1 Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008
consultation will seek to involve all parties who can contribute to or who are affected by the outcome of consultation

it will seek to explain to people why they are being consulted, what they are being consulted about and how their views will contribute to any decision

some people will be less able to participate in consultation than others; specific efforts will be made to identify and target these people; every effort will be made to ensure that consultation is representative

it will seek to ensure that the issues are clearly understood and that objectives, timescales and expectations are clearly identified

relevant and easily understandable information will be provided to consultees with particular attention to those who have special communication needs

the results of the consultation and any impact upon Council decisions will be provided in the most appropriate form both to consultees and the wider community.

Timetable of Core Strategy Production

As stated above, the Core Strategy preparation and stakeholder/public consultation is subject to a number of discrete stages:

Evidence gathering - Completed

Consultation on Core Strategy Issues and Options - Completed October 2006

Consultation on Strategy Directions November 2008 – January 2009

Submission of Core Strategy and Representations to Secretary of State for independent examination - Consultation ~ August – September 2011, with Submission to Secretary of State December 2011.

Examination and publication of Inspectors Report - Examination ~ May 2012, Publication of Inspectors Report ~ Summer 2012

Adoption of Core Strategy - October 2012

Early stakeholder engagement

Government guidance advises that the Council should seek the engagement of relevant stakeholders at the earliest stage, to provide information which in turn will help the authority pinpoint the key issues which the Core Strategy should ultimately address (Planning Policy Statement 12, paragraph 4.28). The choice of consultees at this stage is at the discretion of the Council and should be selected to help ensure that a full range of issues can be identified in the Issues and Options document which
The focus of this stage was to accurately scope the pertinent issues for the future of Rother as they may be relevant for the Core Strategy and for this reason this very early stage of involvement focused towards local stakeholders.

**LDF Workshop – 19th July 2006, Pett Village Hall**

This was an event for the Local Strategic Partnership (LSP) Board and Action Group members (who are responsible for and guide the implementation of the Community Plan) to launch the LDF and specifically, the start of the Core Strategy preparation process. Workshop sessions were held to review the social, economic and environmental characteristics of the district in the emerging Rother in Profile document. A second set of workshops aimed to highlight the key issues for the different parts of the District as below.

### Meetings with Stakeholders

In addition the following meetings were set up with relevant stakeholders before the ‘Issues and Options’ consultation period.

- **LSP Board meetings** – September 2005 and September 2006
- **High Weald Unit** – 31st August 2006
- **Informal meetings** to discuss joint working with Hastings Borough Council

2. **THE ISSUES AND OPTIONS DOCUMENT**

The ‘Issues and Options’ consultation document (which was at this stage a product of the now superseded PPS 12 Local Development Frameworks), comprised of three discrete parts:

- **The Issues and Options discussion document** – This suggested development options for consideration.

- **Rother in Profile** – This reviewed the District’s main characteristics and their spatial variations and the factors that will influence future development patterns. Its function was to provide a basis for discussion about the key issues to address in the district.

- **AResidents questionnaire** – The purpose of which was to gain an understanding of the priorities of local people, to inform the emerging planning strategy.
Consulting on the ‘Issues and Options’ document

At the Cabinet meeting of 2\textsuperscript{nd} October 2006, the Issues and Options document was presented to the members. Here the document was authorised for publication, for the purposes of engaging with the public and other stakeholders. Also it was resolved that presentational and other editorial amendments be made, to make the document as accessible as possible.

It was also resolved at the Cabinet meeting that a broad ranging participation process be undertaken in accordance with the adopted Statement of Community Involvement. At all stages of the preparation of the Core Strategy, the adopted Statement of Community Involvement referred to above, must be complied with. Also, the Council is required to provide an audit trail of the views received at each involvement stage and to demonstrate the extent to which they have been incorporated in the subsequently produced document.

Regulation 25\textsuperscript{2} states that local planning authorities must consult “each of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed DPD” (‘specific consultation bodies’ are national organisations like the Environment Agency, English Nature, Highways Agency etc, sewerage, water, gas, electricity suppliers etc, parish & town councils, adjoining authorities etc.) and “such of the general consultation bodies as the LPA thinks appropriate” (i.e. voluntary bodies, racial groups, religious groups, disabled groups, business groups).

For project management reasons it was considered important that there was a set timeframe within which the Issues and Options document would be widely available for comments. There ran a 6 week consultation period running from Monday 30\textsuperscript{th} October till Friday 8\textsuperscript{th} December 2006. Within this time period the following supportive consultation arrangements were also taken:

- A Residents’ questionnaire published in 3 local papers as well as made available online, accompanied Issues and Options documents and sent to selected households
- Publicity article in local newspapers
- Attendance at individual organisation’s meetings, where requested

In addition, events were held during the consultation period to widen publicity of the document and to obtain feedback. These comprised of:

**Parish Planning Conference – 1\textsuperscript{st} November 2006, Battle Memorial Hall**

This comprised of a presentation to Parish and Town Council Clerks and Chairman to publicise the availability and broad content of the Issues and Options Discussion document, to encourage councils’ involvement in the process and to promote the use of the on-line consultation system.

**Planning Agents Forum – 23\textsuperscript{rd} November 2006**

A presentation to agents working in the area, to inform them about the Core Strategy preparation, process and the system for making on-line representations.

**Bexhill Town Forum – 28th November 2006**

This was a short written exhibition, with an officer present to answer questions. (The issues and Options document had previously been circulated to Forum members)

Some 250 copies of the Issues and Options discussion document were distributed to stakeholders, organisations and local groups. Copies of the document were available in Bexhill, Battle and Rye libraries and the Community Help Points. A print run of 2,500 of the document was carried out. It was also available online.

In addition a number of meetings were set up with relevant stakeholders during and after the consultation period as follows:

- Environment Agency – 27th November 2006
- Hastings and Rother PCT – 6th December 2006
- Rother Local Action Plans Network meeting – 27th January 2007
- Local Education Authority – 12th January 2007
- Highways Agency – 14th February 2007
- Ticehurst Parish Annual Assembly – 27th March 2007

**How did we consult on the Issues and Options document?**

The document was available on the Council’s website, at the Council’s three Community Help-Points, local libraries, available on request, as well as being sent out to consultees.

Although comments could be made in respect of any aspect of the document, it contained 21 specific questions that could be responded to individually, thereby assisting the consultees and broadening the range of information received. Comments could be made online as well as in writing. The Issues and Options document was free of charge.

**Electronic consultation**

In respect of any electronic representations, the Council commissioned JDI Solutions to set up an online system to enable representations to be made and to be viewed electronically.
The Council’s website had a dedicated page relating to the Core Strategy (www.rother.gov.uk/corestrategy). All the documentation associated with the Issues and Options stage was available to view and download from the website. An electronic version of the Residents’ Questionnaire (see below) could be downloaded from the site, completed and emailed back to the Planning Strategy and Environment team.

A dedicated email address (ldf@rother.gov.uk) and phone number were included in all the publicity associated with the Issues and Options Discussion Document to use for contacting the Planning Strategy and Environment team.

Comments on the Issues and Options Discussion Document were invited by letter, by email and on-line.

The on-line system enabled respondents (once registered) to make comments/representations directly on specific parts of the discussion document. Registered respondents can make further comments / representations at subsequent stages, and on later DPDs, by simply logging onto the system using a password of their choice. Respondents can also view the comments/representations they have made by logging in.

The system also allows for all the representations made on a particular document or summaries of them, to be viewed via the website. It is not necessary to register on the system to view the comments/representations made by others. The system also has a search facility so members of the public can check the representations made by a particular organisation or individual.

At the Issues and Options stage, the Residents’ Questionnaire could also be completed on-line.

Rother in Profile

This was made available at the same locations as the main report and was also sent to consultees. Although this document contained no specific questions, Question 1 in the main Issus and Options document asked whether the ‘Profile’ fairly reflected the main characteristics of the District, whether the drivers for change in the profile were correct, and whether there were any more significant?

There was a charge of £5.00 for this document, due to the costs of colour printing, (although it could be downloaded free from the website).

Residents Questionnaire

A short resident's questionnaire was made available on the Council’s website, the Council’s three community help-points, local libraries and was reproduced in the East Sussex Courier on 17th November 2006.
In order to encourage a response, a freepost address was provided and respondents who returned the forms and included the name and address information, were entered into a draw for three prizes of £50.00.

**Press Coverage**

A press release commenting that “the residents of Rother are being asked for their views to help the Council plan for long term development needs” was made and reported in the Rye Observer and Battle Observer on 10th November 2006 and in the Bexhill Observer on 1st December.

The Residents’ Questionnaire was reproduced in the Bexhill, Battle and Rye Observers on 17th November. An advert about the questionnaire was in the East Sussex Courier on 17th November 2007.

**Who did we consult?**

For the Issues and Options Discussion Document consultation, the groups identified in the SCI (see Appendix 1) received a letter at the beginning of the consultation period, as well as all those who had expressed an interest in the document prior to its publication.

**Special arrangements for accessibility of Issues and Options Document**

It was stated within the document that it could be made available on tape or CD for those who are visually impaired, and translated into the eight most common foreign languages spoken in the District, upon reasonable request.

**What did the respondents say to the Issues and Options document?**

There was considerable response to the Issues and Options consultation with 500 representations, as well as 463 completed questionnaires.

All the comments made to the Issues and Options consultation were taken into consideration in formulating the ‘Consultation on Strategy Directions’ document. The responses have been précised and are set out at Appendix 5.

**How have the representations to the Issues and Options document been addressed?**

Appendix 5 also outlines how representations to the twenty one questions have been taken into account in preparing the ‘Consultation on Strategy Directions’ document.

**Residents Questionnaire**

JDI Solutions Ltd electronically tabulated the figures relating to the results of the survey. The questionnaire asked four basic questions about the qualities that make settlements a good place to live and priorities for development. As well as District overview, the results were initially broken down into four settlement areas namely Bexhill, Battle, Rye and the Rural Areas. A précis of the feedback from the resident’s questionnaire is set out at Appendix 6.
The respondents were asked to put a value on different local facilities and indicate whether such facilities are available in their local area. The discrepancy between the two figures gives an indication as to the needs of an area.

The Rural Settlements Study, one of the background documents to the Core Strategy. It has used the feedback from the questionnaire, to inform as to the areas of need within the various settlements within the rural area.

3. ‘STRATEGY DIRECTIONS’ CONSULTATION

The Strategy Directions Document was produced following wide consultation of the Issues and Options document and interpretation of the subsequent representations received.

Prior to the presentation of the Strategy Directions document to Cabinet on the 6th October 2008, a synopsis of the emerging strategy content of the Core Strategy was presented to both Cabinet and Full Council on the 23rd June 2008 for their consideration. A copy of the Cabinet report is at Appendix 7. A resolution of the meeting was to give key stakeholders the opportunity to make informal comments to inform the final consultation document.

Consultation was carried out with the Local Strategic Partnership, Infrastructure/service providers and Parish Councils on the synopsis document.

This consultation took place at the end of June 2008 for a three week period, with the intention that any representations could be fed into the emerging document.

The list of those consulted is at Appendix 8 and a summary of comments received is at Appendix 9.

In addition, the Chairman and Clerk (or substitutes) of all the Parish Councils were invited to one of two workshops on the 8th or 9th July 2008 (for west of District or east of the District respectively), where the synopsis of the Strategy Directions document and the Rural Settlement Study (a background paper to the emerging Core Strategy) were presented and discussed.

Formal Consultation on the Strategy Directions Document

The formal consultation period for this document commenced on November 7th 2008, for a twelve week period, ending on January 30th 2009.

To notify as many people in the district as possible, a local advertisement notice was published in three local papers, setting out:

1. A statement of the representations procedure
2. A statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected.
These adverts were published in the following papers (Copies of adverts at Appendix 11):

- Bexhill Observer – November 7th 2008
- Battle Observer – November 7th 2008
- Rye Observer – November 7th 2008

As well as a formal advertisement, editorial was included in these three papers all published on November 21st 2008, in the Hastings Observer on October 10th and in the Bexhill Observer on December 5th. (Appendix 12)

The document was available on the Council’s website, at the Council’s three Community Help-Points, local libraries as well as being sent out in hard copy of CD format to a range of participants within the Council’s Statement of Community Involvement (SCI) as identified at Appendix 1.

To make the information within the main document accessible, an A4 8 sided summary leaflet was also produced which introduced and gave a broad outline of the ‘Consultation on Strategy Directions’ document (see www.rother.gov.uk/corestrategy) This was also sent to a range of interest parties identified in the SCI.

Electronic consultation

In respect of any electronic consultations, the Council commissioned JDI Solutions to set up an on-line system to enable representations to be made and to be viewed electronically.

A comments form was available on-line (as well as being available in hard copy)

A dedicated email address (planningstrategy@rother.gov.uk) and web page (www.rother.gov.uk/corestrategy) were available and advertised in the main document and summary leaflet. Reference to the Strategy Directions consultation period was made on the Council’s homepage.

Comments on the document were invited by letter, email or on-line.

Exhibitions

To help local people consider the proposals, a series of exhibitions across the district were ran on the following dates and venues:

<table>
<thead>
<tr>
<th>Location</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Westfield Parish Hall</td>
<td>18th November 2008</td>
</tr>
<tr>
<td>Rye Community Learning Centre</td>
<td>20th November 2008</td>
</tr>
<tr>
<td>Battle memorial Hall</td>
<td>24th November 2008</td>
</tr>
<tr>
<td>Ticehurst Institute</td>
<td>25th November 2008</td>
</tr>
<tr>
<td>Bexhill De la Warr Pavilion</td>
<td>27th November 2008</td>
</tr>
<tr>
<td>Bexhill De la Warr Pavilion</td>
<td>28th November 2008</td>
</tr>
</tbody>
</table>
Northiam Village Hall | 2nd December 2008
Robertsbridge Community Hall | 4th December 2008

All exhibitions ran from 2.30 – 7.30pm apart from the Pavilion venue on the 28th November which took place from 10.00 – 4.00pm.

The response to the consultation exercise.

The ‘Consultation on Strategy Directions’ document received a total of 1359 representations to the Strategy Directions consultation, with just under 15% being made electronically, through the on-line system managed by JDI Solutions. All of the non-electronic representations were put on the electronic database and made available to view on-line. The breakdown of the representations, setting out the total number of support, comments and objections and the method that was used in their submission, as well as representation received on the supporting documents, is shown at Appendix 13.

How have the representations been addressed?

The representations have been reviewed and consideration given, as to any actions or alterations to the document that may be required as a result. The summary of the issues that have been raised as a result of the consultation period have been listed at Appendix 9.

Additional Consultation

In addition, events have been held within the consultation period and outside of it, to spread awareness of the Core Strategy and to encourage participation in the process as follows:

Planning Agents Forum

At a Planning Agents forum run on 27th November 2008, a presentation was given to provide information on the consultation process of the Strategy Directions Consultation and the key points of the document.

Parish Council’s Planning Seminar

On 9th December 2008 a presentation was given to members of the xx Parish Councils within the District, to advice them of the ongoing process of the consultation fn the Strategy Directions document and to give an overview of its objectives and parameters.

Battle Town Council’s Town meeting

Battle Town Council held a meeting to discuss the Local Development framework and specifically the Strategy Directions document on 10th December 2009, and invited representatives from the planning department to give a presentation on the key points within the document as they relate to Battle.

Schools event
The Statement of Community Involvement states that particular attention is required to engage those groups not accustomed to being involved in the planning policy process and hard to reach groups within the community. Young people make up some 15% of the population of Rother and are one such group, where there can be difficulties in ensuring that their views are known.

To provide feedback from young people, to specifically input into the Strategy Direction Consultation, a workshop was arranged for representatives of the five secondary schools within the District and to provide 6th form students of Bexhill College with a presentation. The prime purpose of both events was to find out what the students consider needs improving in their area in which they live and what would make the area more attractive to live in.

Some 45 secondary school age students attended the workshop on 21st January and 16 (16 to 18 year old) college students attended a presentation on 22nd January 2009. The need for improved public transport facilities was an important issue that concerned the majority of students and the feedback from the college students is identified at Appendix 14.

The contributions made by the students are currently being evaluated alongside the representations made at the formal consultation stage. As well as the information obtained being important to the planning process, other information received at that time has been passed on to interested stakeholders, so that an insight into the needs of young people can be shared.

**Business event**

This workshop was for business people and organisations within the district to consider how to collectively plan to achieve improvements in the economic 'health' of the district.

The timing of this workshop coincided with the consultation period and a workshop was held on the 21st January 2009, to ensure that local employers were aware of the implications that the emerging Core Strategy could have on the area.

**LSP event**

At an LSP event on July 22nd 2009 the members were given an update on the current situation of the emerging Core Strategy.

**Background Papers**

A number of background papers were prepared by both consultants and in-house to inform the Strategy Directions document. They comprise of:

- Housing Market assessment (jointly with Hastings BC)
- Rural Settlements Study
- PPG 17 Open Space, Sport and Recreation Audit and Assessment
- Shopping Assessment
- Strategic Flood Risk Assessment (SFRA)
These evidence studies are available on the Council’s website.

**Sustainability Appraisal (SA) Strategic Environmental Assessment (SEA) and Habitats Directive Assessment**

The Strategic Environmental Assessment Regulations 2004 set out the requirement for local authorities to undertake a Sustainability Appraisal to assess the environmental, social and economic impact of strategies and policies. This process therefore takes place alongside the preparation of the Local Development Documents to ensure that decisions take account of the need to deliver sustainable development.

Authorities are required initially to seek the views of the consultation bodies on the scope and level of detail of the environmental report and therefore a Scoping Report was initially consulted upon between 10th August and 13th September 2006. The four designated consultation bodies (English Nature, English Heritage, Countryside Agency, and Environment Agency) were notified as well as the Government of the South East³.

Representations from these bodies in respect of the SA and SEA are recorded at Appendix 2, along with the Council’s response to the comments and where in the report amendments have been made.

A second consultation on the updated scope was carried out with the consultation bodies between January 2008 and February 2008, and the report on their feedback, the Council’s response and areas in the report of change are recorded at Appendix 3.

Habitats Directive Assessment is an assessment of the potential effects of a proposed plan or project (which is not necessarily for the management of the site) but is likely to have a significant effect on one or more Natura 2000 sites (see glossary). Natura 2000 sites have been established under the Habitats Directive, the purpose of which is to Safeguard European diversity through designating and protecting Key Sites.

The first stage of the process requires the screening of the plan or programme, to identify the likely impacts on such sites. Therefore a Screening Report was carried out and Natural England were consulted in February 2008, to examine whether the Core Strategy is likely to have any significant impact on any Natura 2000 sites, either alone or in combination with other projects and plans.

The response of Natural England and the changes made accordingly are listed at Appendix 4.

---

³ It is noted that English Nature and the Countryside Agency have now been replaced by Natural England.
4. MAIN ISSUES FROM THE CONSULTATION ON STRATEGY DIRECTIONS

The representations made on the Core Strategy - Strategy Directions were used to inform the drafting of the proposed submission version of the Core Strategy along with the relevant evidence studies.

Below are summaries of the main issues raised at the Strategy Directions stage along with the Council’s response and any consequent changes that were made to the Core Strategy.
## Overall Spatial Strategy

<table>
<thead>
<tr>
<th>Main issues</th>
<th>Key themes</th>
<th>Response and relevant amendments to the Core Strategy</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Scale of growth</strong></td>
<td>Appropriateness of South East Plan targets – both more and less development sought</td>
<td>It is noted that the expectation on LPAs to provide for &quot;at least&quot; the South East Plan housing target was removed prior to adoption. There have been material changes in circumstances which warrant a review of the SE Plan targets, and this is presented on a settlement basis, which is regarded as more appropriate, especially in the context of the government’s ‘localism’ philosophy. The scale of development proposed combines regard to market demand with local visions and constraints. It concludes that a somewhat lesser scale of growth is appropriate.</td>
</tr>
<tr>
<td>Distribution of development</td>
<td>General support for a service centre-led distribution, but other factors</td>
<td>The ‘service centre’ led approach is maintained, but influenced by local factors.</td>
</tr>
<tr>
<td></td>
<td>Relative scale of growth at Battle and Rye - both more and less development sought</td>
<td>Further work has been undertaken in relation to the capacity of the towns and the relationship between development and local objectives. It is accepted that the scale of development proposed somewhat, especially in Rye, should be reduced somewhat to reflect local constraints.</td>
</tr>
<tr>
<td></td>
<td>Development in villages – is there more or less potential, having particular regard to supporting viable communities and AONB impacts</td>
<td>The scale of development previously proposed is considered appropriate and deliverable, whilst it is accepted that the scale of development in any settlement should not be disproportionate and that it should support the existing development pattern. Particular attention is given to helping meet local housing and other community needs in the Rural Areas chapter.</td>
</tr>
<tr>
<td></td>
<td>Are the developments proposed on the Hastings fringes appropriate - both more and less</td>
<td>The larger urban extensions have been reviewed in the light of more recent circumstances and it is concluded that those on the western side of the town would not constitute sustainable expansions. This is elaborated upon in response to representations on the Hastings Fringes section.</td>
</tr>
</tbody>
</table>
### Development sought?

**Development boundaries – general support but need to review**

The principle of development boundaries around settlements is retained, with criteria to guide boundary reviews as part of site allocations work set out.

### Relationship with the Link Road

**Risk of delay or cancellation requires contingencies which should, or should not, identify how development will be reallocated.**

It is accepted that the delay or cancellation of the Link Road will have a major impact on the strategy for Bexhill and especially on the ability to grow to help meet its objectives. Given that the capacity for growth in each settlement has been carefully established, it would not be appropriate to reallocate any shortfall that were to arise in Bexhill as a consequence of such an event to other settlements. For Bexhill itself, the impact of such delays it set out both in terms of what will continue to be promoted, and that which will not, with the precise scale and location of growth will be determined as part of the site allocations process.

### Employment potential

**Will there be the jobs to support growth and how will they be delivered?**

Both SEEDA and Sussex Enterprise broadly support the employment land provisions, while every effort is made in the Core Strategy, including through retention of existing sites, seeking mixed residential and business developments wherever practicable, and facilitating home working, to assist deliverability.

### Bexhill

<table>
<thead>
<tr>
<th>Main issues</th>
<th>Key themes</th>
<th>Response and relevant amendments to the Core Strategy</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Vision</strong></td>
<td>Bexhill has a distinct identity and is discrete from Hastings</td>
<td>The vision for Bexhill reflects the town’s own character and priorities, whilst recognising its relationship with Hastings. This is emphasised by having a specific chapter for Bexhill, with the ‘shared approach to future prosperity’ and the Hastings Fringes elsewhere.</td>
</tr>
<tr>
<td>Shared vision with Hastings</td>
<td>This was generally supported, notably by Hastings Borough Council, but has been updated and considered as part of the overall spatial strategy.</td>
<td></td>
</tr>
<tr>
<td><strong>Location of growth</strong></td>
<td>Developer interest in alternative locations</td>
<td>Alternative locations for outward growth have been further assessed and it is accepted that land to the west of Bexhill is worthy of further detailed investigation in line with the overall strategy for the town. The Core Strategy is amended accordingly.</td>
</tr>
</tbody>
</table>
### Town centre
- **Strengthen role**
  - A specific policy to guide development and other initiatives to support the town centre is put forward in the Bexhill chapter.

### Traffic
- **Continued congestion**
  - Traffic modelling has been carried out to assess the impacts of planned development and has informed the Core Strategy, while it is accepted that this will need to be refined further when individual sites, and traffic management measures, are developed. The position regarding the Link Rod is considered in relation to the overall development strategy.

### Countryside Park
- **Broad support**
  - The Core Strategy maintains a strong commitment to the Countryside Park.

## Hastings Fringes

<table>
<thead>
<tr>
<th>Main issues</th>
<th>Key themes</th>
<th>Response and relevant amendments to the Core Strategy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Major development west of Hastings (Wilting Farm and Breadsell Farm area)</td>
<td>More housing is needed to support a station at Wilting.</td>
<td>A large scale housing release at this location would protrude substantially into the countryside gap and would have a significant impact on the landscape. Housing would be distant from services. Wilting Station was not included in the Rail Utilisation Strategy (RUS), and therefore this does not provide sufficient support for the inclusion of a Station at Wilting. <strong>Wilting Farm proposals no longer appear in the Core Strategy given the lack of a reasonable prospect of a new station in the vicinity within the plan period and issues with landscape impact.</strong></td>
</tr>
<tr>
<td></td>
<td>What is the impact on Crowhurst Station if Wilting is built?</td>
<td><strong>Wilting Farm proposals no longer appear in the Core Strategy given the lack of a reasonable prospect of a new station in the vicinity within the plan period.</strong></td>
</tr>
<tr>
<td></td>
<td>There will be an adverse impact on Marline Valley, Combe Haven and ancient woodland if these developments (Wilting &amp; Breadsell) are to go ahead.</td>
<td>The suggested housing development in the Breadsell Farm area is no longer being pursued following the decision by Hastings Borough Council not to progress substantial development on adjacent land. <strong>The Breadsell Farm area proposals no longer appear in the Core Strategy.</strong></td>
</tr>
<tr>
<td><strong>Gaps around Hastings</strong></td>
<td>What is the impact of development (at Wilting and Breadsell) on the on Battle and Crowhurst countryside gaps?</td>
<td>The suggested housing development in the Breadsell Farm area is no longer being pursued following the decision by Hastings Borough Council not to progress substantial development on adjacent land. Development in the Wilting Farm area is now not included in the Core Strategy given the lack of a reasonable prospect of a new station in the vicinity within the plan period. Both Breadsell Farm area and Wilting Farm proposals no longer appear in the Core Strategy.</td>
</tr>
<tr>
<td>-------------------------</td>
<td>-------------------------------------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td></td>
<td>Identify a countryside gap to Sedlescombe, Pett, Guestling, Three Oaks, Westfield.</td>
<td>These gaps are not considered to be vulnerable as other narrower gaps in the District – no changes made to the Strategy.</td>
</tr>
<tr>
<td><strong>Pebsham Countryside Park</strong></td>
<td>Emphasis should be made to the biodiversity objectives for Pebsham Countryside Park and creating access to the area.</td>
<td>The importance of biodiversity enhancement and improved access in this area is now explicitly recognised and reference in the supporting text. The Hastings Fringes chapter now includes reference to biodiversity enhancement and access.</td>
</tr>
<tr>
<td><strong>Urban Fringe Management</strong></td>
<td>Management of this area (between Ivyhouse Lane &amp; Rock Lane) will need development in order to incentivise landowners to bring this forward.</td>
<td>Effective management may be delivered through a range of mechanisms addressing a range of issues, although it is acknowledged that at the land between Ivyhouse Lane and Rock Lane, some development may play a part in landscape management and accessibility improvements in this area. Reference is made in the Core Strategy to taking a holistic approach to the use and management of land between Ivyhouse Lane and Rock Lane to secure environmental and access improvements in association with an development in the locality.</td>
</tr>
<tr>
<td><strong>Baldslow Link</strong></td>
<td>Emphasis was made to the importance of the Baldslow Link in order to relieve congestion and support</td>
<td>The Baldslow Link has been deleted from the Highways Agency programme of schemes. However, the Council will continue to investigate with the respective agencies for potential highway improvements in this area. Reference is made the Core Strategy to investigating opportunities to improve access to the A21, at Baldslow, including through bus improvements.</td>
</tr>
</tbody>
</table>
**Rye and Rye Harbour**

<table>
<thead>
<tr>
<th>Main issues</th>
<th>Key themes</th>
<th>Response and relevant amendments to the Core Strategy</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Retail</strong></td>
<td>A new supermarket would hurt Rye town centre and would cause greater congestion on the local network. There is no requirement to accommodate additional floorspace in the town.</td>
<td>Rye has limited choice in terms of convenience foodstores within the town. The Core Strategy will continue to support the town centre as the main retail development area. A significant number of residents do their main weekly food shop outside Rye at other centres such as Hastings, Tenterden and Peasmarsh. The <em>Rother District Wide Retail Assessment, 2008</em> has identified a deficiency in convenience floorspace in the town and advocates a need for an additional 1,650 sq.m of convenience retail floorspace to address the shortfall. The location of a of any potential retail development totaling 1650sqm will have to conform to the sequential test guidance set in PPS4. Until such a development is realised further investigation on achieving a suitable retail development within the town centre or adjacent to it will continue as part of the work on the Site Allocations DPD. The Strategy for Rye and Rye Harbour retains a strong commitment to the provision of 1650sqm of convenience floorspace in the town.</td>
</tr>
<tr>
<td><strong>Rye as a Service centre</strong></td>
<td>Support tourism. Protection of the town’s heritage historical and environmental. Consolidate employment at Rye Harbour Road.</td>
<td>This was generally supported, the role of tourism has been acknowledged and role of the town’s historic core plays in the local economy is supported. There is general support for further employment at Rye Harbour Road industrial estate. Consideration has been given to the environmental and physical constraints surrounding the town and reflected in the objectives and in the strategy.</td>
</tr>
<tr>
<td><strong>Flood Risk</strong></td>
<td>Rye and the surrounding locality is at risk from flooding</td>
<td>Acknowledgement that Rye and Rye Harbour has a complex flood pattern. Consideration of flood risk should be considered at all times during the planning process and is reflected in the Strategy and appropriate policies are in placed throughout the document to safeguard communities from flooding.</td>
</tr>
<tr>
<td><strong>Location of</strong></td>
<td>Developer interest in</td>
<td>Rye is heavily constrained and further opportunity for development on the</td>
</tr>
</tbody>
</table>
### Battle

#### Strategy for Direction of Growth

<table>
<thead>
<tr>
<th>Main issues</th>
<th>Key themes</th>
<th>Response and relevant amendments to the Core Strategy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dispute that sectors 4 &amp; 5 (south-east Battle) offer the most suitable direction for growth, or will reduce cross-town traffic.</td>
<td>Further work in the Battle Town Study showed that although the south east does enjoy some advantages as a location, these are not overwhelming compared to other areas of the town. Parts of the south east would have a landscape impact as well as being with the strategic gap. The schools and the supermarket are a significant destination of trips and both located on the west side of the town centre. Furthermore the commitment of Blackfriars will already result in significant levels of housing to the south east of the town for those with a preference for the general location. As a result a more flexible and open strategy has been pursued that will new housing opportunities within the development boundary and via modest peripheral expansion that respects the setting of Battle and the High Weald AONB.</td>
<td></td>
</tr>
<tr>
<td><strong>Supermarket</strong></td>
<td>Indicate broad development only. Detailed policies regarding direction of growth don’t belong in Core Strategy and may prejudice further work.</td>
<td>Whilst it is considered that a town with Battle’s significance in the District can indicate a broad direction of growth in the Core Strategy, it has stepped back from doing so for the above reasons.</td>
</tr>
<tr>
<td>---</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td></td>
<td>Queries as to whether other ‘non favoured’ areas would even be investigated.</td>
<td>Confirmed that all areas were the subject of detailed investigation regardless of their ‘preferred’ or ‘non-preferred’ status in the Strategy Directions. Investigations were conducted as part of the SHLAA, the Landscape Assessment and the Battle Town Study.</td>
</tr>
<tr>
<td><strong>Doctor's Surgery</strong></td>
<td>Question the need</td>
<td>Clarified that need based on evidence in the Retail Assessment. Indication is that vast majority of Battle residents travel to Hastings/St Leonards to do their weekly food shop, which is unsustainable. Commit to meeting need locally remains in strategy.</td>
</tr>
<tr>
<td></td>
<td>New retail should be retained in the town centre</td>
<td>Acknowledged that this is not only national government policy but the Council’s preference.</td>
</tr>
<tr>
<td></td>
<td>Should expand the market place area and the existing supermarket</td>
<td>Whilst the option is not ruled out, it is not the purpose of the Core Strategy to be site specific.</td>
</tr>
<tr>
<td><strong>Traffic Congestion</strong></td>
<td>Representations saying the GP surgery should stay where it is instead of re-locating</td>
<td>Battle Town Study clarifies that following further consultation with the PCT, there are now no immediate plans for the GP surgery to re-locate.</td>
</tr>
<tr>
<td><strong>Car Parking</strong></td>
<td>Query how the strategy will solve the problem</td>
<td>Reference made to the role of the LTP and BLATs and our support for these. Highlighted in more detail in Battle Town Study.</td>
</tr>
<tr>
<td></td>
<td>Debate around need for car park in south east Battle</td>
<td>Discussed in Battle Town Study which suggests the need is less clear cut. Core Strategy does not commit on issue. Left to further investigation in Site Allocations DPD.</td>
</tr>
</tbody>
</table>
### Rural Areas (General Text) and Rural (Villages)

<table>
<thead>
<tr>
<th>Main issues</th>
<th>Key themes</th>
<th>Response and relevant amendments to the Core Strategy</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Aims &amp; Objectives</strong></td>
<td>Several comments regarding their coverage</td>
<td>Aims &amp; Objectives now revised</td>
</tr>
<tr>
<td><strong>Distribution of Housing</strong></td>
<td>Comments both supporting and objecting to service approach and equally supporting various alternatives.</td>
<td>Responded as to why approach is still considered to be the correct one.</td>
</tr>
<tr>
<td></td>
<td>Queries regarding how numbers derived and why they don’t appear to accord with preferred option</td>
<td>Clarified that numbers have since been moderated in light of further evidence (SHLAA, Landscape Assessments)</td>
</tr>
<tr>
<td></td>
<td>Objections and support for numbers individual villages</td>
<td>Discussion with some individual Parish Councils have taken place and in some cases the numbers have altered.</td>
</tr>
<tr>
<td><strong>Services</strong></td>
<td>More emphasis on community hubs needed.</td>
<td>This is supported and more on this issue has been added.</td>
</tr>
<tr>
<td></td>
<td>Need to protect additional services – post office, church halls, etc.</td>
<td>Village and Community halls are supported. Closure of Post Offices largely outside the Local Planning authority’s powers.</td>
</tr>
<tr>
<td><strong>Rural Businesses</strong></td>
<td>Various comments suggesting section needs more weight and clarity. Need to attract higher value jobs and more emphasis on ICT infrastructure</td>
<td>Section expanded into 4 parts – ‘Overall quantum of employment floorspace’, ‘type of employment floorspace’, ‘location of new employment floorspace’, ‘mixed use, ICT and home-working’.</td>
</tr>
</tbody>
</table>
### Countryside strategy

| Various comments highlighting issues such as tourism, equestrianism, leisure and recreation in the countryside | Strategies and policies have been developed to balance the various functions of, and aims for, the countryside with regard to maintaining agricultural capacity and the farming industry, rural employment opportunities, and leisure and tourism. |
| Stronger emphasis needed on full range of agricultural and rural enterprises and initiatives | Text has been developed where appropriate to refer to farm diversification and equestrianism in particular, and to include reference to DEFRA strategies with regard to farming capacity. |
| Clarification required on re-use of agricultural buildings | Text and policies have been developed to cover re-use of modern and historic agricultural buildings. |

### Sustainable Resource Management

<table>
<thead>
<tr>
<th>Main issues</th>
<th>Key themes</th>
<th>Response and relevant amendments to the Core Strategy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Low Carbon Future</td>
<td>Option 2 – exceeding national programme for Code for Sustainable Homes and district renewable energy target generally favoured</td>
<td>The Core Strategy develops a comprehensive policy for moving to a low carbon future, but does not adopt a ‘Merton-type’ district-wide RE target in new development, as this is not advocated in the PPS1: Climate Change Supplement due to the proposed changes in the Building regulations.</td>
</tr>
<tr>
<td></td>
<td>Opportunities for different energy generation options, notably solar, biomass and wind</td>
<td>A Study has been undertaken of the main RE and low carbon potentials, and the findings are highlighted in the Core Strategy.</td>
</tr>
<tr>
<td></td>
<td>Regard to waste and minerals</td>
<td>It is noted that energy from waste is essentially a county matter as it is responsible for waste planning, although biomass potential is addressed.</td>
</tr>
</tbody>
</table>
Encourage and support the efficient use of water resources as one of the proposed measures for tackling the challenges of climate change. Water quality would contribute to maintaining or improving the overall status of water bodies in Rother. Enlargement of Bewl Water Reservoir securing the provision of water supply. Water supply and wastewater infrastructure provision secured in a coordinated way and only permitting development if it has no adverse effect on the quality and potential yield of water resources.

Further work to safeguard additional land to secure the possible expansion of Bewl Water will be defined through the Site Allocations DPD process. A specific policy dealing with water conservation, improving water quality, and improving water efficiency can be found in the Sustainable Resource Management chapter.

The Core Strategy includes a policy which supports the application of SUDs and requires it in the Pevensey Level Hydrological Catchment.

A specific policy ensures the relevant water companies are aware of and have capacity to meet water infrastructure requirement arising from new development.
### Communities

<table>
<thead>
<tr>
<th>Main issues</th>
<th>Key themes</th>
<th>Response and relevant amendments to the Core Strategy</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Aims &amp; Objectives for Communities</strong></td>
<td>LDF should be stronger references to strengthening community life and sustainable communities</td>
<td>The Core Strategy promotes a pro-active approach to maintaining and strengthening communities. Particular priorities include housing, employment, education, community, health and recreation facilities, public transport and being more attractive to young people as a place to live. The Communities chapter also promotes community safety in order to assist in maintaining low crime levels.</td>
</tr>
<tr>
<td><strong>Arts &amp; Culture</strong></td>
<td>Should be included and should have draft policies.</td>
<td>The Core Strategy includes a policy which permits new, improved or replacement community facilities which would include facilities for arts and culture.</td>
</tr>
<tr>
<td><strong>Community facilities</strong></td>
<td>No policies in Core Strategy preventing existing facilities from closure.</td>
<td>The Core Strategy includes a policy which protects the loss of community use facilities.</td>
</tr>
<tr>
<td><strong>Community, Health &amp; Recreation Facilities</strong></td>
<td><strong>Places of Worship</strong></td>
<td>Clarify that Places of Worship are included in Provisions for Community Facilities in line with national and regional guidelines.</td>
</tr>
<tr>
<td><strong>Allotments</strong></td>
<td>Object to new accessibility standard of 20 minutes walk time which over-rides previous standard of 15mins (x4).</td>
<td>Given the rural nature of the District the high proportion of houses and by implication, gardens, and its relatively low population density relative to more urban areas, an accessibility standards of 20 minutes was deemed appropriate.</td>
</tr>
<tr>
<td></td>
<td>The shortfall in provision of allotments</td>
<td>The Council has adopted standards for allotment provision which are supported in the Core Strategy. Any site specific matters will be addressed as</td>
</tr>
<tr>
<td>Community Centres</td>
<td>The Strategy should recognise the importance of community halls/centres and their key role within the community.</td>
<td></td>
</tr>
<tr>
<td>---</td>
<td>---</td>
<td></td>
</tr>
<tr>
<td>Existing allotments should be protected.</td>
<td>part of the Development and Site Allocations DPD.</td>
<td></td>
</tr>
<tr>
<td>Community halls/centres are a key theme within the Communities chapter and their availability to meet local needs is imperative, particularly as places to meet and interact with other members of the community. The loss of these facilities will be resisted.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Older People</th>
<th>Innovative approaches to supporting older people as they grow older are supported.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Allowing older people to remain in their communities.</td>
<td>The Core Strategy supports schemes which allow older people to live independently in their own homes and to increase the range of housing options with care and support in accessible locations.</td>
</tr>
<tr>
<td>Lack of day facilities for the elderly within many if not most villages.</td>
<td>Access to services is a key theme throughout the Core Strategy. The difficulties faced by older people in accessing services has been acknowledged and forms part of the policy within this section. Within the Health, Recreation and Community Facilities section, policies have been developed to include the provision of community facilities to meet a broad range of needs.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Young People</th>
<th>No defined ‘Preferred Strategy’ for young people, but it needs one that is far-reaching.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Omission of a young people’s strategy</td>
<td>This matter has now been addressed and the Core Strategy includes a policy specifically relating to the needs of young people.</td>
</tr>
<tr>
<td>Educational attainment</td>
<td>Access to good quality academic and vocational education is a key element of the Strategy for young people. The policy includes reference to quality education and training facilities.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Community Safety (previously Crime Reduction and Prevention)</th>
<th>Management of greenspace that</th>
</tr>
</thead>
<tbody>
<tr>
<td>Links to other chapters</td>
<td>The creation of sustainable and distinctive communities through innovative design processes should create a high quality built environment, which</td>
</tr>
</tbody>
</table>
promotes community cohesion and environmental improvements has been shown to reduce crime and fear of crime.

promotes sense of place, whilst also having consideration to crime reduction. A policy has been developed in the interest of community safety, which aims to deliver high quality public spaces, which pay attention to public safety.

Local Housing Needs

<table>
<thead>
<tr>
<th>Main issues</th>
<th>Key themes</th>
<th>Response and relevant amendments to the Core Strategy</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Affordable Housing</strong></td>
<td>The options of lowering the site threshold and percentage of affordable housing sought should be informed by a robust assessment of the viability of such options.</td>
<td>The Affordable Housing Viability Study has been carried out in order to inform the Core Strategy policies relating to affordable housing. The Study appraised a number of typical but hypothetical development schemes within Rother to test how viable they are under a range of different circumstances. Further work on the balance of issues for Rother is further investigated and presented in the Affordable Housing background paper.</td>
</tr>
<tr>
<td><strong>Viability</strong></td>
<td>Is the justification for the Strategy based upon an up to date assessment of need.</td>
<td>The Core Strategy has been informed up the Strategic Housing Market Assessment (SHMA) which was produced jointly with Hastings.</td>
</tr>
<tr>
<td><strong>Housing Need</strong></td>
<td>The requirement for a specific percentage of one and two bedroom dwellings should be deleted.</td>
<td>The Strategic Housing Market Assessment (SHMA) has shown that in the rural areas there is a high need for smaller dwellings and therefore a policy reference has been included which promotes a requirement for 30% of new dwellings in developments in rural areas should be 1 or 2 bedrooms, with most emphasis on 2 beds.</td>
</tr>
<tr>
<td><strong>Targets for affordable housing delivery</strong></td>
<td>The number of affordable dwellings that the Strategy seeks to secure through the twenty year period should be set out. The targets for affordable housing delivery are now included in the Core Strategy as an overall target for the plan period and this has been informed by the overall housing numbers included in the Strategy. The methodology for calculating the targets can be found in the Affordable Housing background paper.</td>
<td></td>
</tr>
<tr>
<td><strong>Mix of affordable housing</strong></td>
<td>The approach to define mix of affordable housing is too prescriptive and may not be sufficiently flexible to respond to future changes in need. Planning Policy Statement 3: Housing states that local planning authorities should set separate targets for social-rented and intermediate affordable housing within their LDFs. This has been informed by the Strategic Housing Market Assessment. In the interests of flexibility, reference is made to contributing to an overall balanced of 65% social-rented and 35% intermediate affordable housing.</td>
<td></td>
</tr>
</tbody>
</table>

### Gypsies, Travellers and Travelling Showpeople

<table>
<thead>
<tr>
<th>Main Issues</th>
<th>Key Themes</th>
<th>Response and relevant amendments to the Core Strategy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site location</td>
<td>Sites should not be located in the AONB</td>
<td>Any potential Gypsy, Traveller or Travelling Showpeople site within the AONB would need to demonstrate that it will not create an unacceptable visual or landscape impact.</td>
</tr>
<tr>
<td>Site size</td>
<td>Sites should be considered in relation to their nearest settlement and should not be disproportionate.</td>
<td>The criteria based policy included in the Strategy makes preference to sites not being disproportionate in scale of existing settlements.</td>
</tr>
<tr>
<td>Site criteria</td>
<td>Sites should not be located in vulnerable areas in line with national guidance.</td>
<td>The criteria based policy included in the Strategy has regard to sites not being located in an area at risk from flooding (flood zones 3a &amp; 3b or a functional floodplain), or in close proximity to a Source Protection Zone or significantly contaminated land.</td>
</tr>
</tbody>
</table>
## Economy

<table>
<thead>
<tr>
<th>Main issues</th>
<th>Key themes</th>
<th>Response and relevant amendments to the Core Strategy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Economic priorities</td>
<td>Reduce reliance on out-commuting</td>
<td>Land and floorspace requirements are based on a higher proportion of people working locally in the future, as set out in the Employment Strategy and Land Review.</td>
</tr>
<tr>
<td></td>
<td>Need to create an economic ‘step change’</td>
<td>The need for significant economic improvement is recognised in the ‘key issues’, vision, strategic objectives, economy strategy and related policies.</td>
</tr>
<tr>
<td></td>
<td>High quality ICT vital</td>
<td>This is recognised to mitigate the district’s relative peripherality. The over-arching policy for economic growth includes specific reference to ‘high quality ICT connections’.</td>
</tr>
<tr>
<td>Sites and premises</td>
<td>Need deliverable sites</td>
<td>Emphasis is given to ensuring the viability of employment sites, notably through mixed use developments.</td>
</tr>
<tr>
<td></td>
<td>Need to retain existing sites</td>
<td>A robust policy criterion is put forward that addresses this within a specific policy concerning the need to make most effective use of existing sites and premises.</td>
</tr>
<tr>
<td>Tourism</td>
<td>Provide scope for upgrading</td>
<td>A tourism policy is put forward that facilitates such improvements, and is focused on supporting higher quality markets.</td>
</tr>
<tr>
<td></td>
<td>Promote green tourism</td>
<td>A positive approach is taken to tourism that promotes the area’s heritage and environmental qualities.</td>
</tr>
</tbody>
</table>

## Environment

<table>
<thead>
<tr>
<th>Main issues</th>
<th>Key themes</th>
<th>Response and relevant amendments to the Core Strategy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Landscape Stewardship</td>
<td>General support for strong policies on landscape stewardship.</td>
<td>Text has been developed from Preferred Strategy Directions stage, to highlight locally distinctive landscape features, including reference to the National Character Areas, the ESCC Landscape Assessment character areas, and the recent Rother Ancient Woodland Inventory.</td>
</tr>
<tr>
<td>Design Quality &amp; the Built</td>
<td>General support for strong policies on design quality and</td>
<td>Text and policies have been developed from Preferred Strategy Directions stage, to ensure appropriate references and highlighting of locally distinctive historic features and archaeology, and a clear design policy framework which</td>
</tr>
</tbody>
</table>
| Environment | stewardship of built environment, some strengthening and clarification needed, particularly with reference to archaeology and the public realm. | can be further developed through an SPD.  
A separate policy has been developed for the management of the Public Realm.  
More detailed matters are more relevant to the forthcoming Sites Allocation and Development Management Document. |
| --- | --- | --- |
| Biodiversity | General support for biodiversity policies. Some strengthening of policy to protect designated sites, habitats and species. Also that biodiversity is supported in other policies within the core Strategy. | Text and policies have been developed from Preferred Strategy Directions recognising the need for sensitive management of activities to avoid adverse impacts on designated sites, highlighting the intention to contribute to the Sussex Biodiversity Action Plan targets and the Biodiversity Opportunity Area initiative.  
Policy associated with biodiversity into new development schemes has been strengthened to ensure its integration and protect against losses. |
| Green space | General support for policy on green space. | Text and policies have been developed from Preferred Strategy Directions and key areas of opportunity have been identified within the policy where accessible green space will be developed as part of a green infrastructure network and, at a smaller scale, the requirement to integrate green infrastructure into new development. |
| Flood Risk | General support is given to the preferred strategy for minimizing flood risk and protecting local communities from the risk of flooding. | Text and policies have been developed from Preferred Strategy Directions acknowledging Rother has a complex flood pattern involving fluvial and tidal flood risk A specific policy dealing with flood risk and new development can be found in the Environment chapter. Rother District Council will continue to work with Environment Agency to minimise flood risk to new and existing communities in accordance with PPS25 and accord with current legislation. |
**Transport and Accessibility**

<table>
<thead>
<tr>
<th>Main issues</th>
<th>Key themes</th>
<th>Response and relevant amendments to the Core Strategy</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Strategic Connectivity</strong></td>
<td>Quality and capacity of rail service and lack of investment in infrastructure. Upgrading the Marshlink Retention of local stations and addition infrastructure to reduce journey times</td>
<td>The Core Strategy maintains a strong commitment to improving rail infrastructure. Acknowledgement that improvements to strategic transport corridors will encourage inward investment and regeneration.</td>
</tr>
<tr>
<td>Community Transport</td>
<td>Provision of community transport especially in rural areas.</td>
<td>General support for community transport</td>
</tr>
<tr>
<td>Sustainable transport</td>
<td>Provision of sustainable transport and Integrated transport</td>
<td>General support for the provision of sustainable and integrated transport measures to be introduced in the Core Strategy. This is reflected in the strategy</td>
</tr>
<tr>
<td>Provision of the Link Road</td>
<td>Concern at environmental impact of the Link Road. Cost of the scheme.</td>
<td>Support for the Link Road is retained in the Core Strategy as a catalyst for the release of strategic housing and employment land on the edge of Bexhill and the contribution this makes to the regeneration of the wider area. The position regarding the Link Road is considered in relation to the overall development strategy and Vision for the district up to 2028.</td>
</tr>
<tr>
<td>Car parking</td>
<td>Car parking strategy required.</td>
<td>A specific policy to guide car parking on new development is put forward in the Transport chapter.</td>
</tr>
<tr>
<td>Road Traffic</td>
<td>Continued congestion along key routes Speeding traffic through villages and inappropriate freight</td>
<td>Text and supporting policies have been developed from Preferred Strategy Directions recognising the requirement need for traffic management to avoid adverse impacts on local communities. Rebalancing the transport system in favour of sustainable transport modes and maximising transport choices are key policy directives to tackle congestion and is reflected in the Transport Chapter.</td>
</tr>
</tbody>
</table>
traffic travelling villages. Improve road safety. Support is given to road initiatives in the Core Strategy and there is a commitment to work with ESCC on improving freight traffic through the County-wide freight strategy.

Responses to individual comments will be made available on publication of the proposed submission Core Strategy and will be found online at [http://www.rother.gov.uk/corestrategy](http://www.rother.gov.uk/corestrategy).
5. **FURTHER CONSULTATION PRIOR TO PROPOSED SUBMISSION**

In advance of producing the Proposed Submission version of the Core Strategy, a number of further consultations were carried out with key stakeholders in order to obtain further views and embrace a localism approach to developing the Strategy in line with recent Government announcements regarding the Localism Bill. These consultations along with careful consideration of the comments received on the ‘Strategy Directions’ have been used to inform the proposed submission version to the Core Strategy.

**How did we consult prior to drafting the proposed submission consultation?**

**Business Community Workshop, 20th January 2009, Cooden Beach Hotel, Bexhill**

A number of local businesses were invited to a presentation and workshop held in order to consider individual perspectives and insights into the strengths and weaknesses of the local economy, along with some workshops to discuss and develop priorities for realising opportunities for economic growth within the District. Five main themes derived from the discussions at the event:

- Development viability – addressing the funding gap
- Lack of employment skills (how to identify & address these gaps)
- The perception of employment sites in rural areas being a bad neighbour
- The need for investment in technological infrastructure
- The role of the education sector in connecting with business needs

Notes from the meeting can be founding Appendix 15.

**Accommodation Workshop, 13th November 2009, Crowhurst Park, Battle**

A number of private sector tourism accommodation businesses were invited to an accommodation workshop and presentation. The workshop element allowed the attendees to discuss a number of specific topics relating to the serviced sector, holiday parks, self-catering accommodation and caravans and camping. Issues raised included:

- A need for additional self-catering holiday accommodation in Bexhill,
- Opportunities for more investment in camping (‘glamping’) provision
- Issues relating to planning conditions and permanent occupancy of holiday accommodation
- Potential for new hotels in Bexhill and Camber.

**Parish/Town Council Planning Seminar, 19th November 2010, Northiam Village Hall**

A presentation and workshop was held as part of a wider parish/town planning seminar in order to discuss the proposed changes to the planning system announced by the coalition Government and the intention to review housing numbers to be detailed in the Core Strategy. The workshop element of the event allowed attendees...
the opportunity to be involved in round table discussions regarding the following topics:

- Employment & the Rural Economy
- Land Management
- Housing Issues in the Rural Area
- Development in the Countryside
- Community Life and Services

Each attendee was asked to sign up to a workshop group at the start of the event. During the workshop sessions, groups were then asked to discuss the topic areas in the context of the Strategic Objectives for the chapter areas from the Core Strategy. Details of the discussion notes can be found in Appendix 16.

**Parish Meetings**

The Council has actively engaged with a number of Parishes who made representations on the Core Strategy Consultation on Strategy Directions. The main purpose of the meetings were to discuss particular objections made to the Strategy Directions and to try and resolve any outstanding issues.

- Beckley – Meeting held on 23/02/11
- Burwash – Meeting held on 07/03/11
- Camber – Meeting held on 27/05/11
- Netherfield – Telephone meeting held on 15/03/11
- Northiam – Meeting held on 22/02/11
- Sedlescombe – Meeting held on 09/05/11
- Ewhurst – Meeting held on 01/06/11
- Ticehurst – Meeting held on 21/02/11

**Joint working with Hastings Borough Council on the shared approach to regeneration**

Rother and Hastings Councils have been working together in order to agree a common approach as a basis for joint-working to secure a more prosperous future for the Hastings and Bexhill area, recognising the close relationship between the towns. The agreement addresses shared issues of regeneration, accessibility, and use of land on the urban fringes, especially where a countryside park between the two towns is being promoted.

**Appropriate Assessment for Dungeness SAC and Dungeness to Pett Level SPA**

Rother District Council and Shepway District Council have been working in partnership undertaking a joint Habitat Regulations Assessment (HRA). The Joint HRA with Shepway DC concerns the Dungeness SAC and Dungeness to Pett Level SPA as they straddle both Rother DC and Shepway DC boundaries respectively. In addition Natural England proposes the establishment of a new Ramsar site and extension of the SPA within the Dungeness, Romney Marsh and Rye Bay SSSI and this has been given due consideration during the HRA process. Compliance is
required with Articles 6(3) and 6(4) of Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna (the 'Habitats Directive') in order to ensure the maintenance or restoration of habitats and species of interest to the EU at a favourable condition as required by Article 2 of the Habitats Directive, and to make recommendations which will allow the LDF Core Strategies for Rother District and Shepway District to be declared 'sound'.

There has been early engagement with Natural England as well as other stakeholders to develop any necessary recommendations.

Main outputs comprise:-

1. A HRA for the Shepway LDF Core Strategy
2. A joint HRA for the Shepway and Rother LDF Core Strategies in relation to international wildlife sites at Dungeness, Romney Marsh & Rye Bay (SAC, SPA and proposed Ramsar)
3. A screening review of the potential recreational impact of the Rother Core Strategy on the Hastings Cliffs SAC.

**Appropriate Assessment for the Pevensey Levels**

Rother District Council has worked jointly with Wealden District Council, and also with Eastbourne and Hastings Councils in undertaking a Habitat Regulations Assessment (HRA) in relation to the potential implications of their LDFs on the Pevensey Levels, in accordance with Articles 6(3) and 6(4) of Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna (the 'Habitats Directive') in order to ensure the maintenance or restoration of habitats (Natura 2000 sites) and species of interest to the EU at a favourable condition as required by Article 2 of the Habitats Directive.

The Pevensey Levels, which straddle the Rother DC and Wealden DC boundaries, are designated under the Convention on Wetlands of International Importance (Ramsar sites), and Government policy is that such sites be treated as having equivalent status to Natura 2000 sites.

A 'Screening Report', based on a precautionary principle, concluded that significant effects in relation to the hydrological impact and air quality impact on the Pevensey Levels could not be ruled out. Hence, an Appropriate Assessment has been undertaken in relation to each of these issues.

Natural England was engaged in the process.

The recommendations are contained in the published report.

**Countywide Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA) Group**

The Council is present at the countywide SA/SEA group (held quarterly) which is attended by all local authorities in East Sussex, the Environment Agency and Natural England, with its purpose to share best practice and ensure that a coherent approach
to SA is adopted across the County. Consideration is made to the content of the Sustainability Appraisals to ensure that the principles which underpin its purpose are adhered to consistently and on the advice and expertise provided by the statutory bodies who attend the meetings.

Town Studies

A number of wide ranging consultations were carried out prior to the drafting of the proposed submission version, including three town studies for Bexhill, Battle and Rye & Rye Harbour.

Bexhill Town Study

The Town Study focuses on Bexhill and contributes towards refining the ‘place-shaping’ framework for Rother’s largest settlement. The study appraises the current policy framework nationally and locally. It examines existing evidence collated by Rother District Council contributes to shaping the policies in the LDF Core Strategy.

As part of the drive to involve local representation in the Core Strategy drafting process, a working group was set up to consider the appropriate strategy for Bexhill. An inception meeting was held between Rother District Council and the Bexhill Town Forum Executive. The purpose of the meeting was to:

1. An opportunity presents itself to engage with the Bexhill Town Forum. It is the intention of RDC to produce a background paper to support the Bexhill chapter in the Core Strategy.

2. Review where we are in the process and to make progress with the Core Strategy

3. Refine the Core Strategy Vision for Bexhill and reach a consensus on key planning issues.

4. How can planning influence outcomes? What effective policies can we deliver to help meet aspirations for our communities?

5. Establish a Bexhill Town Forum Executive Study Working group.

In attendance at the Inception meeting was two planning officers from Rother District Council and a number of Members from Bexhill Town Forum Executive. In attendance: Jackie Bialeska, Phil Lee and Conor Hill. From RDC in attendance were: David Marlow (Principal Officer) and Norman Kwan (Planning Strategy Officer). As a result of the Inception meeting the members from Bexhill Town Forum Executive accepted the invite to engage in the process. A series of workshops were held at the Town Hall to debate the issues challenging to challenge Bexhill over the coming plan period.

The Study produced in partnership with the working group, gathered evidence relating to the town and considered the policy implications for the Core Strategy in
light of this evidence. The working group held regular meetings to discuss the issues relating to the town, and jointly devised a key aim and objectives for the Town, which has been used to shape and inform the Battle chapter of the Core Strategy.

**Battle Town Study**

As part of the drive to involve local representation in the Core Strategy drafting process, a working group was set up to consider the appropriate strategy for Battle. A meeting was held between representatives of Battle Town Council and Rother District Council on 28/07/10 to discuss the possibility of working jointly on a Battle Town study in order to ensure a full local involvement in the future strategy for the town. The outcome of that meeting was the decision to form a working group comprising members of Battle Town Council (Cllrs Richard Jessop, Ron Harris, Pauline Fisher and Peter Mills (Parish Clerk)) and an officer from Rother District Council Planning Strategy Team (Roger Comerford).

The Study produced in partnership with the working group, gathered evidence relating to the town and considered the policy implications for the Core Strategy in light of this evidence. The working group held regular meetings to discuss the issues relating to the town, and jointly devised a key aim and objectives for the Town, which has been used to shape and inform the Battle chapter of the Core Strategy.

**Rye & Rye Harbour Town Study**

As part of the drive to involve local representation in the Core Strategy drafting process, a working group was set up to consider the appropriate strategy for Rye & Rye Harbour. An inception meeting was held between Rother District Council and Rye Town Council on the 25th August 2010 to discuss further engagement in the planning process. The purpose of the meeting was to:

1. Review the timetable for the Core Strategy. An opportunity presents itself to engage with the Town Council. It is the intention of RDC to produce a background paper to support the Rye chapter in the Core Strategy.

2. Review where we are in the process and to make progress with the Core Strategy

3. Refine the Core Strategy Vision for Rye and reach a consensus on key planning issues.

4. How can planning influence outcomes? What effective policies can we deliver to help meet aspirations for the communities?

5. Establish a Rye Town Council working group.

In attendance at the Inception meeting was two planning officers from Rother District Council and a number of Councillors from Rye Town Council. In attendance: Cllrs Frank Palmer (Planning Committee Chairman), John Breeds (Mayor), Lorna Hall (Dep Mayor), Paul Osborne (also Cabinet Member at RDC with LDF portfolio), Jo Kirkham, David Russell (RDC Vice Chair) and Richard Farhall (Town Clerk). From
RDC in attendance were: David Marlow (Principal Planning Officer) and Norman Kwan (Planning Officer).

As a result of the Inception meeting Rye Town Council accepted the invite to engage in the process.

The membership of the Working Group included: Cllrs Frank Palmer (Planning Committee Chairman), John Breeds (Mayor), Lorna Hall (Dep Mayor), Paul Osborne (also Cabinet Member at RDC with LDF portfolio), Richard Farhall (Town Clerk) and Norman Kwan (Planning Strategy officer - RDC). During the series of Workshops the Working Group invited Councillors from adjacent parishes when it was appropriate.

The Study produced in partnership with the working group, gathered evidence relating to the town and considered the policy implications for the Core Strategy in light of this evidence. The working group held regular meetings to discuss the issues relating to the town, and jointly devised a key aim and objectives for the Town, which has been used to shape and inform the Rye & Rye Harbour chapter of the Core Strategy.

**Member Training Day, 12th May 2011**

As part of the Council’s commitment to Member training, the Planning department held a Member’s training event focussing around planning at a national, regional and local scale. As part of this event, a presentation was made regarding the emerging proposed submission version of the Core Strategy and gave the opportunity to brief Member’s on the emerging Core Strategy, give Members the opportunity to debate the emerging Strategy prior to formal presentation to Cabinet, and for Members to give officers a steer on any strategic, or specific, concerns with the direction of the emerging Strategy. As part of the event, discussion groups were held with Member’s reflecting the spatial areas in the Core Strategy (Bexhill & Hastings Fringes, Battle and the western rural areas, Rye and the eastern rural areas).

**Background Papers**

A number of background papers were prepared by both consultants and in-house to inform the Proposed Submission version of the Core Strategy. They comprise of:

- Housing Needs Study
- Housing Market Assessment (jointly with Hastings BC)
- Rural Settlements Study
- PPG 17 Open Space, Sport and Recreation Audit and Assessment
- District Wide Shopping Assessment
- Strategic Flood Risk Assessment (SFRA)
- Employment Strategy and Land Review
- Urban Options Background Paper
- Strategic Housing Land Availability Assessment (SHLAA)
- Strategic Housing Market Assessment (jointly with Hastings BC)
- Affordable Housing Viability Study
- Affordable Housing Background Paper
- Bexhill and Hastings Fringes Landscape Assessment
Market Towns and Villages Landscape Assessment
Low Carbon and Renewable Potential Study
Gypsy, Traveller and Travelling Showpeople Background Paper
Overall Housing Provision Background Paper
Battle Town Study
Bexhill Town Study
Rye and Rye Harbour Town Study
Employment Strategy and Land Review – Update

These evidence studies will be published on the Council’s website to accompany the publication of the Proposed Submission Core Strategy.
6. CONSULTATION ON THE PROPOSED SUBMISSION CORE STRATEGY

The Proposed Submission Core Strategy document was presented to Members at Cabinet on 6th June 2011 for approval for the Regulation 27 consultation. It was resolved that the document could be released for consultation in accordance with the Council’s adopted Statement of Community Involvement (SCI). The document was made available for a 6-week consultation from 19th August 2011 – 30th September 2011.

In line with Regulation 27 of the Town and Country Planning Act (2004) as amended, the Proposed Submission Core Strategy, along with its accompanying Sustainability Appraisal was made available for public inspection at Bexhill Town Hall (the Council’s principal office), Battle and Rye Community Help Points (CHPs) and notice was given to the local libraries, that if they had any enquiries regarding the document that they should be directed to the Council’s website (www.rother.gov.uk/corestrategy) and/or offices. These documents were available to the public throughout the entire consultation period.

A list of the documents that were available for inspection alongside the Proposed Submission Core Strategy, both at the public inspection sites detailed above, and on the Council’s website during the consultation period can be found in Appendix 17.

Extension of consultation period

During the course of the consultation, further notification was given to extend it by a further 6 weeks to 11th November to assist any interested parties to consider the documentation and make representations.

How did we consult on the Proposed Submission Core Strategy

All consultees on the Council’s Local Development Framework consultation database were notified of the Proposed Submission Core Strategy consultation, either by email or letter. This included both the specific and general consultation bodies, plus other interested parties who have previously registered an interest in the Local Development Framework. These bodies were further contacted in order to inform them of the extension of the consultation period.

All Parish Councils were sent two hard copies of the Proposed Submission Core Strategy in order to consider the draft document.

As the consultation at this stage was more formal than previous rounds, it was not considered appropriate to hold a series of meetings and exhibitions regarding the consultation. However, 4 presentations were given as part of this work in response to requests.

- The Agents Forum – 28th June 2011 – Town Hall, Bexhill

This comprised of a presentation to the Agents Forum (regular meeting with planning agents) regarding the Local Development Framework, specifically the Core Strategy
and the Local Development Scheme. The agents were informed of the likely consultation dates and how they could be involved.

- **Bexhill Chamber of Commerce – 14th September 2011 – Cooden Beach Hotel, Bexhill**

This comprised of a presentation to the Bexhill Chamber of Commerce regarding the Core Strategy, with a specific focus on Bexhill. These included employment prospects, the Bexhill-Hastings Link Road and the role/future of Bexhill town centre.

- **Residents Meeting – Collington and St Marks wards – 15th September 2011 – St Peters Community Centre, Bexhill**

This comprised of a presentation to around 150 residents of Collington and St Marks wards. The purpose was to assist the local Councillors (who arranged the event) in ensuring that their constituents were fully aware of the plans in the draft Core Strategy, with specific focus on the wide range of issues affecting Bexhill. These included the availability of jobs, the future for the town centre, traffic, and discussion specifically in relation to possible development off the A259 at Barnhorn Road. The consultation process was also discussed and the ways in which the residents could get involved and make their representations.

- **Bexhill Town Forum – 20th September 2011 – De La Warr Pavilion, Bexhill**

This comprised of a presentation to the Bexhill Town Forum (which was advertised by the Forum in the local newspaper) to discuss the general content of the Core Strategy, with specific reference to Bexhill and the work carried out as part of the Bexhill Town Study. The consultation process was also discussed and the ways in which the Forum and general members of public could get involved and make their representations.

**Public Notice and Press Coverage**

The consultation was advertised within the Observer newspaper (Bexhill, Battle, Rye and Hastings editions) on the 19th August 2011, and again on 30th September 2011, to advertise the extension of the consultation period for a further 6 weeks. Copies of these notices can be found at Appendix 18.

Press releases were also published to advertise the consultation and were placed on the homepage of the Council’s website and were also sent to the Observer for publication at the start of the consultation. Copies of these can also be found at Appendix 18.

Those wishing to make representations on the Proposed Submission Core Strategy were invited to do so through the Council’s online consultation system or using the specifically designed representation form (based on the PINS guidance).

Representations could be made directly into the online consultation software, on the representation forms and emailed to a specific email address (planning-strategy@rother.gov.uk) or posted to the Planning Strategy team at the Town Hall. Consultees were encouraged to make their representations through these methods. However, representations received as letters were also accepted.
Representations made on the Proposed Submission Core Strategy Consultation

During the 12 week Proposed Core Strategy Consultation, 653 individual representations were made by 89 individuals/groups. Almost 50% of representations were made through the online consultation system, with 36% submitted on paper and 14% sent through by email.

Below are summaries of the main issues raised at the Proposed Submission stage along with the Council’s response.
### CHAPTER 1. INTRODUCTION

<table>
<thead>
<tr>
<th>Issue area</th>
<th>Views expressed in representations</th>
<th>RDC Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Regard to the Sustainability Appraisal</td>
<td>The lack of consistency and rigour in the analysis that is displayed, coupled with the lack of clarity as to exactly what is being tested against what, means that the document fails to achieve the necessary standard required to meet the directive. The SA is defective and the Core Strategy procedurally unsound.</td>
<td>The Sustainability Appraisal process (including the process of generating and appraising options) is in keeping with both the SEA Directive and good practice, and is fundamentally sound. However, it is accepted that it would benefit from further explanatory and contextual information, including clarification of options assessed. This will be added.</td>
</tr>
</tbody>
</table>

### CHAPTER 2. POLICY CONTEXT

<table>
<thead>
<tr>
<th>Issue area</th>
<th>Views expressed in representations</th>
<th>RDC Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Level of conformity to the South East Plan</td>
<td>Having set a locally derived housing target to meet the needs of the community in Rother it is essential that the number of dwellings is actually delivered within the plan period, irrespective of whether or not the Bexhill/Hastings link road is provided. If the link road does not go ahead the housing allocation related to it should be re-allocated in other parts of the District, including in the Rural Service Centres.</td>
<td>The Department of Transport has now given funding approval for the Link Road, subject to outstanding procedures, which gives confidence that the development strategy, which has been prepared to accord with the South East Plan, is achievable.</td>
</tr>
</tbody>
</table>

### CHAPTER 5. SPATIAL VISION

<table>
<thead>
<tr>
<th>Issue area</th>
<th>Views expressed in representations</th>
<th>RDC Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Infrastructure, especially Link Road</td>
<td>Vision should refer to the Link Road.</td>
<td>Infrastructure clearly facilitates the vision, and the Link Road is given specific attention, but it is not part of the vision for Bexhill.</td>
</tr>
<tr>
<td>Cultural role of Rye</td>
<td>The Vision should add that it is recognised for its artistic and cultural activities.</td>
<td>It is proposed to amend the supporting text in the Rye and Rye Harbour chapter to reflect the cultural and artistic heritage of the town.</td>
</tr>
</tbody>
</table>
### CHAPTER 6. STRATEGIC OBJECTIVES

<table>
<thead>
<tr>
<th>Issue area</th>
<th>Views expressed in representations</th>
<th>RDC Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Infrastructure, especially Link Road</td>
<td>Vision should refer to the Link Road.</td>
<td>Infrastructure clearly facilitates the vision, and the Link Road is given specific attention, but it is not part of the vision for Bexhill.</td>
</tr>
<tr>
<td>Cultural role of Rye</td>
<td>The Strategic objective for Rye should refer to its cultural role.</td>
<td>Regard has been given to cultural and tourism assets in RY1 (xi). However further minor amendments to the supporting text will be made in the Rye and Rye Harbour chapter to reflect the cultural and artistic heritage of the town.</td>
</tr>
<tr>
<td>Rural areas</td>
<td>Change reference to meeting ‘local’ need in rural areas to contributing to meeting housing need as a whole (especially Robertsbridge). Add that development should be focussed on larger villages. Refer to reducing traffic speed.</td>
<td>The rural areas are virtually all designated as an Area of Outstanding Natural Beauty, where PPS7 focussed on meeting local need, and where the NPPF requires that ‘great weight’ should be given to conservation of the landscape. There will still be some contribution to meeting wider needs.</td>
</tr>
</tbody>
</table>

### CHAPTER 7. OVERALL SPATIAL STRATEGY

<table>
<thead>
<tr>
<th>Issue area</th>
<th>Views expressed in representations</th>
<th>RDC Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Conformity with South East Plan in terms of housing numbers</td>
<td>Increase in housing in line with SE Plan requirement, and extrapolate forwards.</td>
<td>The Strategy has always been prepared to generally conform with the South East Plan as starting point, but it is legitimate to review assumptions on which its housing requirements were based. Policy CC7 accepts relationship between scale and pace of housing and infrastructure provision. It is believed that the Core Strategy does conform generally with the South East Plan.</td>
</tr>
<tr>
<td></td>
<td>Reallocate housing elsewhere in order to meet RSS target (see also Issue Area regarding reliance on Link Road below).</td>
<td></td>
</tr>
<tr>
<td></td>
<td>The CS should be prepared on the basis of the South East Plan being extant.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>The Core Strategy and supporting background paper provide inadequate justification for the level of housing growth below the South East Plan, which should be</td>
<td>Not accept that the Core Strategy takes too short term a view of development feasibility.</td>
</tr>
</tbody>
</table>
| Conformity with PPS3 and Draft NPPF in terms of housing | Need to take more account of housing demand, type tenure and mix.  
Need to give compelling evidence that prevent specific sites being identified (Draft NPPF).  
Increase housing (incl. to meet South East Plan, plus 20%; to meet demand). | Consider that PPS3 was complied with. An assessment of compliance with the NPPF, and specifically the regard to housing need has been prepared. It concludes that the strategies of Rother and Hastings taken together are consistent with the NPPF. NPPF “buffers” for housing supply are not intended to mean an increase in overall targets, although Policy IM3 will be amended accordingly.. |
| Conformity with Localism Act | Have regard to duty to cooperate in planning strategically and spatially.  
Overall shortfall in housing in East Sussex on basis of current plans. | A background paper which shows that the Core Strategy has been prepared with requisite co-operation with other public bodies has been prepared. |
| Presentation of house building levels as a range | Have a single target with a contingency. | Range provides reasonable flexibility, reflecting ranges in sub-areas. |
| Achieving the housing target in OSS1 relies on uncertain Link Road | OSS1 should be qualified by cross-reference to OSS2.  
If the Link Road is not built and Bexhill cannot accommodate its share of development, then some/all housing should be met elsewhere in the District. | All policies should be read together. Link Road funding further obviates the need for this. |
| Maintaining a sufficient and continuous land supply | Have an alternative/contingency strategy to continuously meet target 3,700-4,100 dwellings, as this scale of housing reflects forecast household growth (SHMA Figure 2.7). | The Core Strategy explicitly aims to maintain a continuous supply of land. An alternative strategy is not necessary in light of Link Road funding approval. |
| The hierarchy of villages in OSS1 is not carried through in the Key Diagram | Amendments to the Key Diagram to reflect Figure 12 and the settlement hierarchy (with greater emphasis on the role of Robertsbridge and Ticehurst). | The Key Diagram distinguishes the ‘rural service centres’ (and the market towns) by the larger size of circles. Its main purpose is to show different development potentials, which it does appropriately. |
| Regard to windfall sites | No allowance should be made for windfall sites.  
It should be made clear that windfall sites will not limit allocated sites from being developed. These should be safeguarded and released in favour of windfall sites. | The Core Strategy makes only a conservative allowance for windfalls, relative to past rates. Policy IM3 identifies the basis for phasing development. The impact of a large number of windfall units on a settlement may justify holding back an allocation. |
<table>
<thead>
<tr>
<th>Policy OSS2 appropriateness and clarity</th>
<th>Policy does not conform with PPS3 or the Draft NPPF; it proposes a very different strategy; hence, delete and have alternative distribution strategy (see separate reps for different areas).</th>
<th>Equally, it is accepted that regard should be had to the existence of an allocation in considering windfall proposals.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Part (i) should be deleted as not properly a policy statement?</td>
<td>Not agree. It is a clear statement of intent, which is integral to the strategy.</td>
<td>It has been assessed that other parts of the District do not have the capacity for further sustainable growth. It is consistent with the overall strategy for the district and provides a contingency, rather than a different strategy.</td>
</tr>
<tr>
<td>Part (ii) should clarify the extent of delay to the Link Road that would bring the policy criteria into play.</td>
<td>The term “significantly” is regarded as appropriate, as a delay of only 6-18 months could be caught up, but an exact timing would be unjustifiably precise at this stage.</td>
<td></td>
</tr>
<tr>
<td>Delete criterion (iii)(c), as it is not substantiated.</td>
<td>Initial modelling shows traffic congestion from strategic growth in all locations, and is subject to (d).</td>
<td></td>
</tr>
<tr>
<td>Give a clearer indication of pre-Link Road scale of development at Bexhill.</td>
<td>This is not considered necessary, given funding approval for the Link Road.</td>
<td></td>
</tr>
<tr>
<td>The contingency strategy in OSS2 should be subject to a Sustainability Appraisal.</td>
<td>The appraisal of specific scales/locations of development would come at the site allocation stage when the options without link road would be considered further, but that is no longer necessary.</td>
<td></td>
</tr>
<tr>
<td>The policy, especially, criterion (iii), leaves too much for later determination. Need to provide more detail on quantity, location and timing of development without Link Road.</td>
<td>This is not considered necessary, given funding approval for the Link Road.</td>
<td></td>
</tr>
<tr>
<td>Settlement development boundaries (Policy OSS4)</td>
<td>Show settlements with development boundaries on the key Diagram. Need to be more flexible about where development can happen.</td>
<td>The policy clearly expresses the intention to continue to apply development boundaries, and all villages with existing boundaries are shown on the Key Diagram as recognised settlements. However, the potential for further infill/extension will only come through detailed site allocation work, so a definitive position would be premature.</td>
</tr>
<tr>
<td>Housing provision in rural</td>
<td>The target should be increased (e.g. from 950-1,000 to</td>
<td>Both the overall rural housing numbers and the numbers</td>
</tr>
<tr>
<td>Area</td>
<td>Details</td>
<td>Notes</td>
</tr>
<tr>
<td>------</td>
<td>---------</td>
<td>-------</td>
</tr>
<tr>
<td>Battle and Rye – Figure 8</td>
<td>Housing provision in Battle and Rye – Figure 8</td>
<td>The targets should be increased to reflect capacity. Housing targets are considered to reflect capacity for sustainable growth.</td>
</tr>
<tr>
<td>Bexhill</td>
<td>Housing provision in Bexhill (Extent of ‘potential broad location for further development’ to west of Bexhill)</td>
<td>Allow more development, especially as alternative if Link Road not built. The scale of growth reflects the local vision and potential for sustainable growth.</td>
</tr>
<tr>
<td>Hastings</td>
<td>A strategic allocation to the north west of Hastings</td>
<td>A strategic housing allocation on land at Breadsell Lane, encompassing land in Rother and Hastings, should be made. This is not being proposed by Hastings BC (within whose area most of the land lies), while a smaller allocation in Rother is not regarded as sustainable.</td>
</tr>
<tr>
<td></td>
<td>Windfall allowance</td>
<td>No need to provide for windfall sites (as SHLAA sites may provide more capacity). SHLAA shows potential to deliver the spatial strategy. Only sites below the SHLAA size threshold are included in windfall allowance, in order to indicate approximate scale of allocations needed. This conforms to PPS3, is supported by evidence and use of development boundaries.</td>
</tr>
<tr>
<td></td>
<td>Policy OSS4</td>
<td>Add criterion that expects close proximity to local services. Although this is covered by Policy TR3, an amendment to OSS4 is accepted.</td>
</tr>
<tr>
<td></td>
<td>Policy OSS5 – regard to presumption in favour of sustainable development</td>
<td>Amend policy to have the presumption in favour of sustainable development at its core. The document as a whole defines when development would be sustainable, and is considered to reflect the presumption in the NPPF.</td>
</tr>
<tr>
<td></td>
<td>Objectives, and generic policies</td>
<td>Add support to contributing to carbon reduction.</td>
</tr>
</tbody>
</table>
## CHAPTER 8. BEXHILL

<table>
<thead>
<tr>
<th>Issue area</th>
<th>Views expressed in representations</th>
<th>RDC Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reliance on Link Road</td>
<td>Remove reliance on Link Road to meet development requirements.</td>
<td>The transport network constraint is supported by the Highway Authority, but largely overcome by Link Road funding approval.</td>
</tr>
<tr>
<td>Scale and timing of growth</td>
<td>More housing development potential with Link Road.</td>
<td>Scale of development is justified in both vision and capacity terms. The likely early timing of the Link Road removes need for clarification.</td>
</tr>
<tr>
<td>Strategic development locations</td>
<td>Allocate and release West Bexhill early (as not dependent on Link Road) and define scale, timing, location. Development north of Bexhill is not deliverable (as reliant on new road, no developer).</td>
<td>Priority to NE Bexhill is justified in SA and the assessment of options; timing of development other locations is already identified in OSS2 as subject to further work on site allocations. Accept likely later phasing of any development to the north of the town; deliverability will be further assessed in site allocations work.</td>
</tr>
<tr>
<td>Town centre</td>
<td>Insufficient clarity/detail.</td>
<td>Appropriate level of detail for a Core Strategy. Have sequential assessment for land north of railway and developer interest can be shown. Conservation Area is protected by BX2(vi).</td>
</tr>
<tr>
<td>Ravenside</td>
<td>District centre designation of Ravenside.</td>
<td>Inspector previously rejected this and little material change.</td>
</tr>
<tr>
<td>Glyne Gap railway station</td>
<td>Uncertain case and impact, including on traffic.</td>
<td>Further work to update the earlier viability assessment is being undertaken. Brief for consultants is being prepared in line with Network Rail’s GRIP process.</td>
</tr>
</tbody>
</table>

## CHAPTER 9. HASTINGS FRINGES

<table>
<thead>
<tr>
<th>Issue area</th>
<th>Views expressed in representations</th>
<th>RDC Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Land at Breadsell</td>
<td>Does not include a strategic housing, employment and community facilities allocation at Breadsell, and in the context of OSS1 results in an under-supply of housing land.</td>
<td>Hastings Borough Council are no longer pursuing a strategic allocation at Breadsell, due to a strong objection by Natural England. RDC has always maintained that this site can only come forward as part of a</td>
</tr>
</tbody>
</table>
Introducing a strategic allocation at Breadsell would meet the objectives of OSS4.

Too much reliance on importance of the Link Road which has not come forward. An allocation in this location would add further weight to support the Link Road.

Sedlescombe protected gap

It is not justified to exclude the gap between the Hastings fringes and Sedlescombe from this policy.

This is not considered to be vulnerable as other narrower gaps in the District.

Baldslow improvements

The inclusion of bus improvements in the policy to improve access to the A21 at Baldslow would be neither effective nor justified as bus improvements would not improve access to the A21 (Sedlescombe PC).

The policy seeks to investigate opportunities to improve access to the A21, including through bus improvements. However the Council will continue to work with the Highways Authority, ESCC and Hastings Borough Council to seek improvements the road infrastructure to increase capacity.

Housing numbers

The need to build up to an additional 80 dwellings on the Hastings fringes has not been fully justified because there is a lack of available development land in the Rother District on the Hastings fringes.

Background evidence work shows that there is some potential for additional housing development within the Fringe area, however, this has been restricted to a maximum of 80 dwellings.

**CHAPTER 10. RYE AND RYE HARBOUR CHAPTER**

<table>
<thead>
<tr>
<th>Issue area</th>
<th>Views expressed in representations</th>
<th>RDC Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scopes and Issues Paragraph 10.1 – 10.6</td>
<td>Little mention of cultural and artistic heritage and offer in Rye. The Town Council do not consider the policy wording strong enough.</td>
<td>Cultural and artistic heritage in Rye is acknowledged in RY1 (xi) and seeks to promote, support and enhance the cultural offer in Rye and Rye Harbour. Minor textural changes in scope and issues to reflect cultural and artistic heritage of the town.</td>
</tr>
<tr>
<td>Policy RY1 and Paragraphs 10.1 - 10.23</td>
<td>Policy RY1 is inconsistent with EC3 in reference to protecting employment sites and considered unsound. The strategic allocation at RY1 (Rock Channel) will remove a strategic employment site and replace it with housing.</td>
<td>The Core Strategy is not site specific document. Specific allocations will be dealt through the DSA DPD. There are significant constraints in and around Rye and the town has absorbed significant development in recent years and this is reflected in the housing range put forward for Rye in the next plan period. Regard given to other policies of the Plan in EC3 (ii) permitting</td>
</tr>
</tbody>
</table>
| Policy RY1 | The reduction in the housing allocation from 450 to a range 250-350 up to 2028 is not justified. Brownfield allocations will not accommodate the required growth in Rye and further consideration of land to the north of Rye in Playden Parish should be considered. 

Rye needs development to sustain itself. 

The uncertainty surrounding the delivery of the Link Road in Bexhill should facilitate additional development in and around Rye. 

Employment use at Rye Harbour Road is too restrictive and should include other locations like Rock Channel. 

Development should be restricted on the urban fringe of Rye because of environmental constraints. 

RY1 (viii) clarity is sought for the word ‘enhance’ in regards to navigation on the Rye Harbour and activity on the Port of Rye with regards to the N2K sites (Natural England). 

RY1 (ix) the mitigation strategy outline in 10.20 regarding tourism and development on the N2K sites should be incorporated into the policy criterion (ix). Furthermore does (ix) include Camber Sands and Broomhill (Natural England). |
| --- | --- |
|  | intensification, conversion, redevelopment and/or extension of existing employment sites. 

Further development on the urban fringe would have to overcome significant environmental constraints. There has been significant development at Udimore Road in the last plan period and it is considered the quantum of development put forward in the range is appropriate for this plan period. The NPPF confirms making best use of brownfield land. 

Funding for the Link Road has been secured and delivery of the scheme will be in 2014/15. In any event the quantum of development should not be redistributed to Rye (or Battle or the rural areas) if the Link Road had not come forward, as they have been already assessed in terms of their capacity for sustainable growth. 

Paragraph 10.16 acknowledges Rye’s main employment area will continue to centre on Rye Harbour Road. 

Employment at Rye Harbour Road is supported as existing commercial infrastructure and availability of employment sites are readily available at this location. 

It is accepted that Rye is tightly constrained, with specific issues regarding impact on landscape, ecology and flood risk. Potential will be further assessed through Site Allocations work. 

Discussions have taken place with Natural England and they have agreed to withdraw their objection. 

Agree textual changes should acknowledge the sensitivity of the international sites to unmanaged recreation and tourism activity. Discussed with Natural England. |
**CHAPTER 11. BATTLE**

<table>
<thead>
<tr>
<th>Issue area</th>
<th>Views expressed in representations</th>
<th>RDC Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Impact of New Development on Infrastructure</td>
<td>Wish to see greater recognition of the impact of new development on overstretched infrastructure, and a statement which requires new development to move forward at a pace consistent with improvements in infrastructure. (Battle Town Council)</td>
<td>Cross-reference Implementation and Monitoring Framework and supporting Infrastructure Delivery Plan.</td>
</tr>
</tbody>
</table>

| Housing Allocation               | Housing numbers should be raised and support sector 5 for preferred direction of growth.            | Housing numbers and preferred directions of growth based on extensive evidence and consultation. |
|                                  | Housing numbers should be raised in event of link road not going ahead. Numbers should not be prejudiced at CS stage. Contend that Blackfriars is not deliverable due to viability issues. Promote other areas. |                                                                                   |

**CHAPTER 12. RURAL AREAS**

<table>
<thead>
<tr>
<th>Issue area</th>
<th>Views expressed in representations</th>
<th>RDC Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Settlement Hierarchy</td>
<td>Fails to articulate why distinction has been made or the consequences of position of villages in the settlement hierarchy.</td>
<td>National guidance and background Rural Settlement Study (5a and 5c) both clarify the role and purpose of the settlement hierarchy. Para 12.15 elaborates on why they are important and for what purpose.</td>
</tr>
<tr>
<td></td>
<td>Should refer to strengthening the pivotal role of Rural</td>
<td>The identification of Rural Service Centres and the</td>
</tr>
<tr>
<td>Topic</td>
<td>Summary</td>
<td>Notes</td>
</tr>
<tr>
<td>----------------------------------------------------------------------</td>
<td>------------------------------------------------------------------------</td>
<td>----------------------------------------------------------------------</td>
</tr>
<tr>
<td>Service Centres, with own policy.</td>
<td>wider settlement hierarchy has been integral to the formulation of the overall development strategy.</td>
<td></td>
</tr>
<tr>
<td>Housing Numbers (Rural area total)</td>
<td>CS acknowledges historical importance of new housing in rural areas but now proposes reduction of 50% from last 20 years trend.</td>
<td>Past trends considered to be unsustainable in light of environmental constraints on development. This is set out in the document. It is felt that the total reflects national policy.</td>
</tr>
<tr>
<td>Distribution of development - housing and employment</td>
<td>Inconsistent application of settlement hierarchy. Greater proportion to larger settlements in accordance with hierarchy.</td>
<td>Larger settlements do have a greater proportion. Para 12.15 clarifies that the service hierarchy is not the sole factor at play.</td>
</tr>
<tr>
<td>Housing Numbers (Specific villages)</td>
<td>More housing suggested in several villages, notably Catsfield, Ticehurst, Robertsbridge, Flimwell. Others where local argument that too high: Robertsbridge, Fairlight, Northiam.</td>
<td>It is felt that the numbers are felt to be appropriate for individual settlements. They have been subject to extensive back ground evidence gathering and assessment including the Rural Settlement Study, the Landscape Assessments and the Strategic Housing Land Availability Assessment.</td>
</tr>
<tr>
<td>Housing Numbers (General principle)</td>
<td>Disagree with having range, should be up to a certain level which is tested at Site Allocations DPD. Too inflexible, numbers are too restrictive.</td>
<td>RA1(v) states range subject to refinement in light of Site Allocations DPD.</td>
</tr>
<tr>
<td>Housing Numbers (Phasing)</td>
<td>Object to perceived front-loading of extant permissions and allocations.</td>
<td>Our work on housing delivery indicate that permission and extant allocations are being progressed.</td>
</tr>
<tr>
<td>Existing Housing Allocations</td>
<td>Allocations remaining from LP should be checked to see if can be delivered against trajectory.</td>
<td>Existing allocations are assessed in AMR and in SHLAA.</td>
</tr>
<tr>
<td>SHLAA</td>
<td>Not robust and failed to update its initial assessment in light of current planning policy or new evidence.</td>
<td>Dates from just 2010. Considered to be sufficiently up to date and fit for purpose.</td>
</tr>
<tr>
<td>Redundant Countryside buildings for affordable housing (RA4)</td>
<td>Objection to prioritising of affordable housing in redundant countryside buildings. Should not resist conversion for residential. AH will be unviable.</td>
<td>Prioritisation of affordable housing is proposed to be removed. Clarity on viability added. Economic and tourism uses remain prioritised ahead of</td>
</tr>
<tr>
<td><strong>Issue</strong></td>
<td><strong>Views expressed in representations</strong></td>
<td><strong>RDC Response</strong></td>
</tr>
<tr>
<td>----------</td>
<td>--------------------------------------</td>
<td>-----------------</td>
</tr>
<tr>
<td>Caravan sites</td>
<td>Object to conversion to residential for financial gain.</td>
<td>Noted; priority to employment uses if no longer needed for agricultural purposes.</td>
</tr>
<tr>
<td></td>
<td>Object to creeping development of permanent dwellings and transformation into residential, such as has happened at Winchelsea Beach.</td>
<td>Policy EC6 vi addresses this very issue.</td>
</tr>
<tr>
<td>Existing Employment</td>
<td>Emphasise retain local employment.</td>
<td>Covered by policy EC3 and rural objective iii.</td>
</tr>
<tr>
<td></td>
<td>Should be more positive in supporting existing businesses, particularly with the Rural Service Centres. (Robertsbridge Enterprise Group).</td>
<td>Policies RA1(ii), RA3(ii) and Economy chapter are supportive</td>
</tr>
<tr>
<td></td>
<td>Need to protect High Street areas from Change of use (Robertsbridge Enterprise Group).</td>
<td>Policy element in light of NPPF to cover services. Agree need to extend protection to local services.</td>
</tr>
<tr>
<td>Tourism</td>
<td>Policy EC6 should be reflected in RA2 so that tourism is given greater prominence.</td>
<td>The two policies should be read alongside one another. It is not necessary for RA2 to repeat EC6.</td>
</tr>
<tr>
<td></td>
<td>Objection to RA2(viii) – ill-defined purpose. Lack of consistency with EC6.</td>
<td>Touring caravans are included within the scope of EC6. They are specifically mentioned in RA2 as they are typically a rural concern.</td>
</tr>
<tr>
<td>RA2</td>
<td>Object to lack of recognition of essential utility development to serve new and existing development is acceptable in the Countryside.</td>
<td>Reference should be made to Chapter 19.</td>
</tr>
<tr>
<td>RA3</td>
<td>Further clarity required in reference to wildlife and habitats in Rural Areas chapter.</td>
<td>Further elaboration of the term ‘natural resources’ in RA3(v) is proposed.</td>
</tr>
</tbody>
</table>

### CHAPTER 13. SUSTAINABLE RESOURCE MANAGEMENT

<table>
<thead>
<tr>
<th><strong>Issue area</strong></th>
<th><strong>Views expressed in representations</strong></th>
<th><strong>RDC Response</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Proportion of Renewable Energy in new development</td>
<td>Dispute paragraph 13.15 and feel a local requirement is necessary (Rother Environmental Group).</td>
<td>Covered by on-going changes to building regulations.</td>
</tr>
<tr>
<td>Code for Sustainable Homes</td>
<td>Objection is made to Rother’s carbon reduction strategy. As a minimum residential development should be level 3 (Code for Sustainable Homes) with incentives to encourage developers to build to level 4/5 with strong aspirations to reach level 6 (zero carbon).</td>
<td>The Government expect LPAs to be consistent with national policy. Building Regulations are being amended. Textual mention considered appropriate.</td>
</tr>
<tr>
<td>Topic</td>
<td>Details</td>
<td>Notes</td>
</tr>
<tr>
<td>-------</td>
<td>---------</td>
<td>-------</td>
</tr>
<tr>
<td>Energy Strategy</td>
<td>Objection is also made to the policy requirement on development of 100 dwellings or 1,000 sq m should have an energy strategy as it is considered this type of development is rare in Rother and would only be implemented once or twice. Consideration should be given over to a reduction of the threshold to capture smaller scale of development and a change to policy wording to strengthen Rother’s commitment to a low carbon future.</td>
<td>This is proposed to be amended. Supporting evidence in the form of the ‘Low Carbon &amp; Renewable Potential Study’ suggested 10 dwellings and 1000sq.m. should have an energy strategy.</td>
</tr>
<tr>
<td>Recycling</td>
<td>The strategy should state that recycling and waste reduction are key elements in the Carbon Reduction Strategy and that new developments will incorporate features to facilitate this such as accessible storage area for recycling containers etc.</td>
<td>A reference to recycling may be added to SRM1 to complement existing text in Chapter7 at paragraph 7.75.</td>
</tr>
<tr>
<td>Renewable Energy Requirements of NE Bexhill</td>
<td>Concern in criterion (iv) for developments to North East Bexhill, to include Combined Heat and Power (CHP) and/or wind energy, pre-judges the outcome of the comprehensive energy strategy required by criterion (i) of the Policy to support any planning application for the area. Clear evidence is required to demonstrate that a CHP system and/or wind energy generation is both technically feasible and financially viable if it is to remain as a Policy requirement. Trinity College has not yet commissioned any such work.</td>
<td>This was the subject of earlier work specifically in support of NE Bexhill. Textual clarification to be added.</td>
</tr>
<tr>
<td>Policy SRM2</td>
<td>SRM2 (v) is unsound. Promotion of the use of rainwater and grey water storage and recycling to the exclusion of other water efficiency is not justified. There are other water efficiency measures that could be applied.</td>
<td>Agree to redraft criterion (v) and supporting text to give greater emphasis to water efficiency.</td>
</tr>
<tr>
<td>Water efficiency in developments</td>
<td>‘Promotion’ is not strong enough. The policy should be to ensure that all developments consider rainwater and require larger developments to incorporate rainwater harvesting.</td>
<td>Amendments proposed to SRM2 (v) to give greater emphasis to water efficiency and reduce water consumption.</td>
</tr>
</tbody>
</table>

Both IM2 and SRM2 do not provide the strategic framework for the provision of water and wastewater infrastructure. A supportive planning policy framework is sought. Water and Wastewater infrastructure will be identified through the Infrastructure Delivery Plan. Any additional water and wastewater infrastructure to support planned
Further clarity is sought on how the Council would reduce water consumption through the planning process. Consideration should be given to more robust wording to Policy SRM2 (v) to deliver enforceable planning conditions. The introduction of more stringent conditions attached to water level consumption applied to major developments and there is no mention of BREEAM standards.

The representation also considers the SA report has identified potentially significant effects of Plan policies but considers policy SRM2 is not robust enough to satisfy the requirements of Water Framework Directive and deliver effective water efficiency measures and protection of groundwater sources. Consideration should be given to wording changes. (EA)

**CHAPTER 14. COMMUNITIES**

<table>
<thead>
<tr>
<th>Issue area</th>
<th>Views expressed in representations</th>
<th>RDC Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Improving Sports and Recreation Facilities</td>
<td>Policy CO3 and paragraph 14.28: (a) the evidence base upon which the policy relies is unreliable/inappropriate; (b) no consultation or testing of the &quot;adopted standard&quot;; (c) the policy fails to set an appropriate framework for the provision of open space, both in terms of the overall standard being sought, and the absence of recognition that the requirement for open space in new development would need to be sensitive to any existing provision. (Marchfield Land).</td>
<td>The Rother Open Space, Sport and Recreation Study has been adopted by the Council and is used to determine the quantity, quality and access standards for this provision in Rother.</td>
</tr>
<tr>
<td></td>
<td>Policy CO3 (vi) giving particular support for water-based recreation along the coast near Camber Sands and Bexhill, and at Bewl Water.</td>
<td>Textual changes are put forward following discussions with Natural England, and have due regard to the International sites.</td>
</tr>
</tbody>
</table>
Section (vi) needs to incorporate sensitive recreation in-order to protect the biodiversity interest of these sites and the integrity of the N2K sites and SSSI. These issues are touched on in the supporting text but not translated in the policy.

Whilst increasing access to the countryside by promoting improvements to the rights of way network is supported, it is not justified to include the words "especially around urban areas, particularly in reference to Pebsham Countryside Park". To be consistent, all rights of way should be afforded the same protection otherwise some paths receive considerably more attention to the detriment of more rural paths.

The policy promotes increased access to the countryside by promoting improvements to the rights of way network. Although it makes specific reference to Bexhill and the new Combe Haven Countryside Park, where there is an identified deficiency in access to open space. There is no less protection for rights of way elsewhere within the District.

Young People

It is not justified to speak about providing various housing options suited to the needs of young people, especially in Bexhill and the rural areas whilst missing out Battle and Rye.

Policy CO4 makes specific reference to the provision of housing options for young people in Bexhill and rural areas, where there is a specific acute identified need. There are higher than average numbers of young people that live in Bexhill specifically and acute affordability issues within the rural areas.

### CHAPTER 15. LOCAL HOUSING NEEDS

<table>
<thead>
<tr>
<th>Issue area</th>
<th>Views expressed in representations</th>
<th>RDC Response</th>
</tr>
</thead>
</table>
| Achieving mixed and balanced communities       | Part ii of the policy requires developments in rural areas to provide 30% 1 & 2 bed properties, this is overly restrictive and should be removed. Part i is sufficient.  
The proposal to include at least 30% one or two bedroom dwellings is not justified. More larger family homes are needed. | There is a shortage of smaller dwellings in the rural areas as shown by the Strategic Housing Market Assessment (SHMA). Given the strong bias towards larger homes in rural areas, there is justification for seeking smaller units in these areas to promote balanced communities and offer accommodation to both young and older households within the District. This is supported by evidence with the SHMA.  
The method of calculating the cost of affordable housing should be included and up for debate.                                                                   |
<p>| The method of calculating the cost of affordable housing should be included and up for debate. | The definition of affordable housing is set by Government, as well as the process for calculating affordable and intermediate rents. |                                                                                                                                               |</p>
<table>
<thead>
<tr>
<th>Affordable housing</th>
<th>We need to stop building open market housing and provide a greater provision of affordable dwellings.</th>
<th>Planning applications which include provision for affordable housing re accompanied with a legal agreement to ensure that they remain so in perpetuity.</th>
</tr>
</thead>
<tbody>
<tr>
<td>We need to stop building open market housing and provide a greater provision of affordable dwellings.</td>
<td>Policy LHN2 makes provision for affordable dwellings in developments and applies a spatial approach to percentage requirements. Given the factors discussed in the ‘Overall Spatial Strategy’ chapter, it would be impractical to stop building open market housing within the District.</td>
<td></td>
</tr>
<tr>
<td>The evidence base indicates that there is more locally derived need unmet in Rye than elsewhere in Rother. The Strategic Housing Market Assessment recommends 40% affordable housing in Rye and whilst being less profitable is still viable. It is therefore disappointing that the provision of affordable housing within developments has been reduced from 40% to 30%. The reduction in the allocation of affordable housing provision, combined with the reduction in housing allocation from 450 to 350, and the fact that there is a strong second home market in Rye means that local demand for homes will not be met.</td>
<td>This approach is in clear response to the regeneration aims for Rye. There is a clear explanation within the Affordable Housing Background Paper as to the reason for this approach.</td>
<td></td>
</tr>
<tr>
<td>LHN2(iv)(a) The &quot;Affordable Housing&quot; background paper mentions that affordable housing should be provided in rural areas where there is a &quot;demonstrable need&quot; and not in accordance with a blanket percentage figure of houses to be provided. Villages which already have a greater percentage of affordable housing than the average of the District should not be required to add further to that stock.</td>
<td>Given the acute need for affordable housing within the District, it is not deemed appropriate for an exception to providing for affordable housing in some rural areas.</td>
<td></td>
</tr>
<tr>
<td>The reasoning behind why larger sites cannot be considered for wholly affordable, locally required housing is not fully explained. If there is a site in a village which can fulfil the needs of the</td>
<td>In the interests of ensuring mixed and sustainable communities, it is not considered good practice to build larger developments (of 15 or more dwellings) that are solely affordable housing. As such it is considered</td>
<td></td>
</tr>
<tr>
<td>Village, then this is what it should be used for before any new ordinary market housing is agreed.</td>
<td>The 40% affordable housing figure is too onerous as an inflexible percentage (Rural Areas). This should be a target or goal in order to provide more flexibility for schemes to be commercially viable. The threshold of 5 dwellings is too low and should be set at a higher level of say 14 which in recent years has been the norm. Currently, the proposals as set out will stop housing coming forward. The 40% affordable housing figure is too onerous as an inflexible percentage (Rural Areas). This should be a target or goal in order to provide more flexibility for schemes to be commercially viable. The threshold of 5 dwellings is too low and should be set at a higher level of say 14 which in recent years has been the norm. Currently, the proposals as set out will stop housing coming forward.</td>
<td>Background evidence from the SHMA and Affordable Housing Viability Study (AHVS) shows that the percentage requirements used in Policy LHN2 are appropriate. Where there is an issue with viability, there is sufficient flexibility to allow lower percentages of affordable housing, where it is robustly demonstrated.</td>
</tr>
</tbody>
</table>

| Part (v) - While it is acknowledged that there is a high level of need within the rural parts, the 40% requirement could render open market housing development as unviable. This is of significance, as housing development in rural settlements makes a significant contribution to overall housing. While the policy enables an applicant to demonstrate viability, no clarification is provided as to the level or nature of such justification. It is also unclear how the Council would manage financial contributions or be directed towards the provision of affordable housing. | Part (v) - While it is acknowledged that there is a high level of need within the rural parts, the 40% requirement could render open market housing development as unviable. This is of significance, as housing development in rural settlements makes a significant contribution to overall housing. While the policy enables an applicant to demonstrate viability, no clarification is provided as to the level or nature of such justification. It is also unclear how the Council would manage financial contributions or be directed towards the provision of affordable housing. | Background evidence from the SHMA and Affordable Housing Viability Study (AHVS) shows that the percentage requirements used in Policy LHN2 are appropriate. Where there is an issue with viability, there is sufficient flexibility to allow lower percentages of affordable housing, where it is robustly demonstrated. | Background evidence from the SHMA and Affordable Housing Viability Study (AHVS) shows that the percentage requirements used in Policy LHN2 are appropriate. Where there is an issue with viability, there is sufficient flexibility to allow lower percentages of affordable housing, where it is robustly demonstrated. |

| Gypsies, Travellers and Travelling Showpeople – Number of pitches | The planned level of permanent site provision does not reflect all available evidence and the Council should plan for a larger number of pitches that indicated in the policy – should plan for 11 to 2016 & further 8 2016-28. | The methodology for calculating need for pitches within the District is detailed within the Gypsy, Traveller and Travelling Showpeople background paper. It is based on a robust assessment of needs within the District. This is a countywide agreed approach. | The methodology for calculating need for pitches within the District is detailed within the Gypsy, Traveller and Travelling Showpeople background paper. It is based on a robust assessment of needs within the District. This is a countywide agreed approach. |

| Gypsies, Travellers and Travelling Showpeople – criteria based policy | Policy criteria is overly restrictive 1) Not located in a nature conservation area – conflicts with para 54 of 01/2006 and should not in itself be used to refuse planning permission for sites. 2) Flood risk – EA maps are incorrect, should be assessed by an FRA rather than relying on these maps | Since this representation was made, central Government have deleted Circular 01/2006 and therefore holds no weight in planning policy terms. However, the new Planning Policy for Traveller Sites (PPTS) sets out new planning policy on this topic area. | Since this representation was made, central Government have deleted Circular 01/2006 and therefore holds no weight in planning policy terms. However, the new Planning Policy for Traveller Sites (PPTS) sets out new planning policy on this topic area. |
3) Located close to or within an existing settlement may not always be achievable.

It would not be appropriate to locate pitches in close proximity to wastewater treatment works. Smells are inherent in the treatment process and it would not be appropriate to site pitches close by.

Residential development, such as gypsy and traveller sites, without essential utility provision located in close proximity to a wastewater treatment works cannot be considered sustainable. Development must be sustainable to be consistent with PPS1.

Furthermore, paragraph 4.45 of PPS 12 requires that, to be deliverable and therefore effective, core strategies should be based on sound infrastructure planning. This omission from policy LNH6 is clearly contrary to PPS 12.

This matter is already covered by other policies within the planning policy framework. However, supporting text will be added to make this cross-reference.

<table>
<thead>
<tr>
<th>Issue area</th>
<th>Views expressed in representations</th>
<th>RDC Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scale of business floorspace</td>
<td>Not likely to be sufficient for number of jobs to be accommodated by employment sites when demand is limited relative to housing. Too dependent on Link Road to achieve level (other locations potential e.g. Rye).</td>
<td>Employment Strategy and Land Reviews justify the provision sought.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rural workspace</td>
<td>More emphasis on rural workspace, including as part of mixed developments. More clarity on priorities for reuse of employment sites (affordable housing will not work).</td>
<td>Mixed uses covered by policy EC4. Envisage detailed DM policy/SPD Accept viability issue with affordable housing in conversion schemes. Proposed to amend Policy RA4.</td>
</tr>
<tr>
<td>Approach to tourism</td>
<td>Conflicting reps regarding need to be more/less (especially regarding AONB impacts) supportive.</td>
<td>Policy reflects studies of potential and have been balanced with environmental considerations.</td>
</tr>
<tr>
<td>Issue area</td>
<td>Views expressed in representations</td>
<td>RDC Response</td>
</tr>
<tr>
<td>------------</td>
<td>-----------------------------------</td>
<td>--------------</td>
</tr>
<tr>
<td>Landscape stewardship – carbon reduction</td>
<td>Need for carbon reduction strategy.</td>
<td>This issue is covered in Chapter 13: Sustainable Resource Management, and specifically Policy SRM:1 Towards a Low Carbon Future. It is not considered appropriate to address this issue additionally in the Landscape Stewardship policies.</td>
</tr>
<tr>
<td>Landscape Stewardship</td>
<td>Remove caveat ‘wherever possible’ from ‘enhancement’ of landscape (referenced to LA’s statutory duty to have regard to the purposes of AONB designation, the conservation and enhancement of natural beauty.</td>
<td>Wording appropriate. Does not conflict with our statutory duty and not all the District’s landscape is a designated AONB.</td>
</tr>
<tr>
<td>Landscape Stewardship</td>
<td>Use Landscape Stewardship to review sustainable service settlement boundaries to consider additional housing provision.</td>
<td>Chapter 7 considers Overall Spatial Strategy, while distribution of rural housing is considered in Chapter 12 Rural Areas in policy RA1: Villages. These allocations will be further developed through the Site Allocations DPD, which will involve consideration of all potential sites in the context of a variety of constraints, including environmental and landscape ones. It is not considered appropriate to include reference to housing allocations in the Landscape Stewardship policies.</td>
</tr>
<tr>
<td>Tranquil Areas</td>
<td>Not an objection, but a suggestion that reference be made to the CPRE National Tranquility Mapping Project.</td>
<td>Concept referenced in EN1. Specific studies not referred to.</td>
</tr>
<tr>
<td>---------------</td>
<td>-------------------------------------------------------------------------------------------------</td>
<td>--------------------------------------------------</td>
</tr>
<tr>
<td>Design Quality</td>
<td>Policy EN3 to include a specific reference to Rye and its setting, and a commitment to produce additional ‘design criteria’ for Rye.</td>
<td>The thematic chapters of the Core Strategy are intentionally non-spatial. Chapter 10:Rye and Rye Harbour contains Policy RY1 relating to development in Rye, though RY1iii could be made more explicit, to relate to the Rye Objectives which refer to the uniqueness and distinctiveness of the historic town of Rye and its landscape setting. Policy EN3, and the subsequent Key Design Principles SPD is considered sufficient to ensure a high level of design quality in all areas of the district, particularly in view of EN3f ‘Design in Context’.</td>
</tr>
<tr>
<td>Vehicles and the Public Realm</td>
<td>Consideration of issue of parked and moving vehicles degrading public realm – possible policy addition to include the creation of vehicle free zones.</td>
<td>Policy EN4 (i) regarding management of the public realm would provide the framework for the consideration of any such initiative on a localised basis. Meanwhile integrated transport policies are considered within Chapter 18: Transport &amp; Accessibility. No policy amendment is considered necessary.</td>
</tr>
<tr>
<td>Policies EN6 and EN7</td>
<td>Changes to text is sought to recognise the importance of environmentally designated sites. NE would like reference in the Core Strategy taking account of natural coastal processes along the undeveloped stretches and in relation to nature conservation sites.</td>
<td>The Core Strategy has given due consideration to the Shoreline Management Plan. The HRA has been amended to include coastal processes.</td>
</tr>
<tr>
<td>Hierarchy of sites – international, national, local.</td>
<td>Need to differentiate between relative importance and need to emphasise protection and enhancement of designated sites (CPRE &amp; Natural England).</td>
<td>Amendments to Policy EN5 to reflect hierarchy of designated sites is agreed. Supporting textual amendments proposed as well.</td>
</tr>
<tr>
<td>HRA/AA</td>
<td>Wording of para 17.41 needs to change to reflect the</td>
<td>Agreed. Amended text proposed reflecting the AA</td>
</tr>
</tbody>
</table>
process of AA and what it expects to achieve. In this case a monitoring programme can be put in place with the aim of providing a strategy mechanism to deal with any effects before they arise or become significant and can be included in the delivery of the core strategy (Natural England).

Climate Change

Capacity for natural environment to adapt needs to be built into policy (Natural England).

Although not directly linked to climate change, it is felt that Policy EN5 does this, particularly part (iv).

Links to this issue elsewhere, e.g SRM1.

Role of Green Infrastructure

Needs to clarify how will alleviate pressure on Natura 2000 sites. Some policy hook needed to show this is part of GI function. RDC could work jointly with Shepway (Natural England).

The Council alongside other agencies and stakeholders will implement a sustainable access management strategy to monitor visitor numbers and ensure responsible management of the International sites. The implementation of the Combe Valley CP will also introduce a significant green infrastructure amenity between Bexhill and Hastings and will contribute to alleviating pressure from the International sites.

### CHAPTER 18. TRANSPORT

<table>
<thead>
<tr>
<th>Issue area</th>
<th>Views expressed in representations</th>
<th>RDC Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy TR1 and supporting text</td>
<td>Paragraph 18.2 is misleading. The Link Road is not presently deliverable.</td>
<td>Funding to the Link Road has been secured. Delivery of the BHLR is scheduled for 2014/15.</td>
</tr>
<tr>
<td></td>
<td>The BHLR will not improve sub-regional accessibility and will undermine sustainable alternatives.</td>
<td>The Link Road will improve access and reduced travel times between Bexhill and Hastings. The release of employment land will also create opportunities for local jobs and minimise the requirement to make long trips to work. The Core Strategy will seek improvements to integrated transport through Policy TR2 and the Council</td>
</tr>
</tbody>
</table>
**CHAPTER 19. IMPLEMENTATION AND MONITORING**

<table>
<thead>
<tr>
<th>Issue area</th>
<th>Direction Sought by Rep</th>
<th>RDC Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>IM2 is dependent on the separate IDP and does not form part of the Core Strategy. The Core Strategy is largely silent on the overall strategic infrastructure and identifying critical infrastructure.</td>
<td>The IDP is a live document and is under constant review. The document is part of the evidence base to support the Core Strategy. The IDP also identifies the BHLR as being critical to delivering the spatial objectives stipulated in the Core Strategy.</td>
<td></td>
</tr>
<tr>
<td>The IDP is inconclusive in identifying infrastructure requirements but in other areas such as the Link Road it does provide a clear position but there is no evidence to substantiate the position.</td>
<td>IDP is a live document. It is acknowledged there will be some uncertainty surrounding infrastructure planning. Many infrastructure providers operate under different structures and investment plans. The BHLR is identified as a ‘showstopper’ and therefore contingency planning is</td>
<td></td>
</tr>
<tr>
<td>Policy IM3</td>
<td>The Core Strategy is not compliant with emerging NPPF and the requirement of five year housing supply with additional 20%.</td>
<td>Amendment made to Policy IM3 (i) to ensure compliance with the NPPF.</td>
</tr>
<tr>
<td>-----------</td>
<td>------------------------------------------------------------------------------------------------------------------</td>
<td>---------------------------------------------------------------</td>
</tr>
<tr>
<td></td>
<td>The practical effects of the non-delivery of the Link Road are not clear in the IDP and contingencies or the lesser scale of development is not clear.</td>
<td>Funding to the Link Road has been secured. Delivery of the road is scheduled for 2014/15. Further elaboration of contingencies is therefore not regarded as necessary.</td>
</tr>
</tbody>
</table>
7. CONSULTATION RELATING TO THE FOCUSED AMENDMENTS TO THE PROPOSED SUBMISSION CORE STRATEGY

As a result of the consideration of the representations received during the Proposed Submission Core Strategy consultation, there were a number of main issues arising. These matters have been considered by the Council and a number of focused amendments have been put forward for consultation. These focused amendments incorporate policy and textual changes in response to the main issues arising from the Proposed Submission Core Strategy consultation and amendments as a result of the publication of the National Planning Policy Framework (NPPF). On 21st May 2012, the Council resolved to approve the Core Strategy, incorporating focused amendments, for Submission to the Secretary of State, whilst holding a parallel 6-week consultation for representations on the focused amendments. The minutes relating to this resolution can be found at Appendix 19.

In line with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Focused Amendments to the Proposed Submission Core Strategy will be made available for public inspection at Bexhill Town Hall (the Council’s principal office), Battle and Rye Community Help Points (CHPs). The consultation on the Focused Amendments to the Proposed Submission Core Strategy will run from 15th June 2012 to 4.30pm on 27th July 2012. These documents will be available to the public throughout the entire consultation period.

How will we consult on the Focused Amendments to the Proposed Submission Core Strategy?

All consultees on the Council’s Local Development Framework consultation database were notified of the Focused Amendments to the Proposed Submission Core Strategy consultation, either by email or letter. This included both specific and general consultation bodies, all those consultees who responded to the Proposed Submission Core Strategy Consultation, plus other interested parties who have previously registered an interest in the Local Development Framework.

All Parish Councils were sent an electronic copy (or hard copy where necessary) of the Focused Amendments to the Proposed Submission Core Strategy in order to consider them.

The consultation will be advertised within the Observer newspaper (Bexhill, Battle, Rye and Hastings editions) on the 15th June 2012. Copies of these notices can be found at Appendix 20.

Those wishing to make representations on the Proposed Submission Core Strategy are being invited to do so through the Council’s online consultation system or using the specifically designed representation form (based on the PINS guidance).

Representations could be made directly into the online consultation software, on the representation forms and emailed to a specific email address (planningstrategy@rother.gov.uk) or posted to the Head of Planning at the Town
Hall. Consultees are encouraged to make their representations through these methods to assist the Inspector in their consideration of the representations.

All duly-made representations made on the Focused Amendments to the Proposed Submission Core Strategy will be sent to the Inspector for consideration.
Appendix 1 - Extract from the Statement of Community Involvement

List of Participants

This list is for information only. Its purpose is to give an indication of the range of types of participants, by means of examples, who may be involved in the preparation of planning policy documents. ‘Specific consultation bodies’ are denoted in italic text. Where bodies listed cease to exist, successor bodies will be consulted. Contacts information is held in an electronic database which can updated as details change.

A – Local groups and individuals

Individuals who have asked to be kept informed of key stages in the preparation of planning policy documents
Business groups e.g. chambers of commerce, Sussex Enterprise, 1066 Enterprise
Landscape, wildlife and heritage groups e.g. conservation associations, High Weald AONB Unit, Sussex Wildlife Trust
Residents’ associations and Community associations
Faith groups
Race groups e.g. Rother Race Action Forum
Groups representing the elderly e.g. Age Concern, the Older Persons’ Forum
Groups representing young people e.g. Bexhill Youth Council, Rural Rother Youth Forum
Voluntary groups e.g. Rother Voluntary Action (also in Group E)
Disability groups e.g. Hastings & Rother Disability Forum
Regeneration groups and partnerships
Rural interest groups e.g. Action in Rural Sussex (also in Group E)

B – Parish & Town Councils, members of Bexhill Town Forum, Parish Councils adjoining the District Boundary

C – Utility and Service Providers
Relevant water and sewerage companies e.g. Southern Water, South East Water Ltd, Mid Kent Water
Relevant electricity and gas companies e.g. Seeboard Power Networks plc., British Gas Transco
Emergency services e.g. East Sussex Fire Brigade, Ambulance Service, Sussex Police
Relevant telecoms companies and Mobile Operators’ Association
Relevant health agencies e.g. Bexhill & Rother Primary Care Trust (also in Group E), Surrey & Sussex Strategic Health Authority
Registered Social Landlords/Housing Associations working in Rother (Rother Homes also in Group E)
Relevant bus & train operators
Health & Safety Executive
Romney Marshes Area Internal Drainage Board
D – Governmental/regional bodies
East Sussex County Council (also in Group E) (to include Property division, Highway Authority, Education Authority, waste & minerals planning authority)
adjoining District, Borough and County Councils i.e. Hastings Borough Council, Shepway District Council, Ashford Borough Council, Tunbridge Wells Borough Council, Wealden District Council, Kent County Council
Government Office for the South East (GOSE)
South East England Regional Assembly* (SEERA)
South East England Development Agency* (SEEDA) (also in Group E)
Any relevant government departments
Hastings & Bexhill Task Force
English Partnerships

E – Rother Local Strategic Partnership
South East England Development Agency (SEEDA)
Government Office for the South East (GOSE)
East Sussex County Council
Rother District Council
Member of the Youth Parliament
Rother Voluntary Action
Action in Rural Sussex
Bexhill & Rother Primary Care Trust
Crime & Disorder Reduction Partnership
East Sussex Learning Partnership
Rother Environmental Group
Rother Homes
1066 Enterprise
LSP Action Groups

F - National Organisations and Agencies
Historic Buildings & Monuments Commission for England (English Heritage)
Countryside Agency
English Nature
Environment Agency
Highways Agency
National Trust
Forestry Commission
Farming & Wildlife Advisory Group (FWAG)
Housing Corporation
National Playing Fields Association
Sport England
Network Rail
BRB (Residuary) Ltd (formerly British Rail Property Board)
Country, Land & Business Association
Federation of Small Businesses
Church Commissioners
Commission for Architecture and the Build Environment (CABE)
RSPB
Freight Transport Association
Traveller Law Reform Coalition
Help the Aged
The Theatres Trust
Inland Waterways Association (IWA)

G – Developers, Landowners, Planning Consultants
House Builders’ Federation
Developers, landowners and consultants who have asked to be kept informed of the
key stages in planning policy document preparation
### Question 1 Are there any other documents or sustainable development objectives relevant to this report?

<table>
<thead>
<tr>
<th>CA</th>
<th>High Weald AONB Management Plan</th>
<th>Included in PPPSI Review</th>
<th>Appendix 1</th>
</tr>
</thead>
<tbody>
<tr>
<td>EA</td>
<td>Waste Strategy, 2000</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>DEFRA Making space for Water 2005,</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Catchment Flood Management Plans</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Rother CAMS 2006</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>PPS 25 – Development and flood risk</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Review of the Waste Strategy 2006</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>EA State of the Environment report</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Waste Strategy 2007 reviewed</td>
<td></td>
<td>Appendix 1</td>
</tr>
<tr>
<td></td>
<td>Reviewed</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Reviewed</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Reviewed</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Waste Strategy 2007 reviewed</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Reviewed</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Question 2 Are you aware of any inaccuracies in the baseline data presented?

<table>
<thead>
<tr>
<th>EA</th>
<th>Improve baseline by further explanation. Graphs/tables have no explanation and data source not identified</th>
<th>The “Rother in Profile” spatial portrait that has been used as the baseline has this information</th>
<th>Appendix 2</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>The “Rother in Profile” spatial portrait that has been used as the baseline has this information</td>
<td>Appendix 2</td>
<td></td>
</tr>
</tbody>
</table>

### Question 3 Do you agree that the baseline data collected is relevant to the Core Strategy DPD?

<table>
<thead>
<tr>
<th>EA</th>
<th>Add Water Framework directive and associated indicators. Also EA ‘State of the Environment’ report.</th>
<th>Both reviewed as part of PPPSI review and targets identified.</th>
<th>Appendix 1</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Both reviewed as part of PPPSI review and targets identified.</td>
<td>Appendix 1</td>
<td></td>
</tr>
</tbody>
</table>

### Question 4 Are you aware of any additional baseline data that should be included?

<table>
<thead>
<tr>
<th>CA</th>
<th>Add more details on the quality and quantity of the networks of cycle routes and footpaths, open spaces and energy consumption</th>
<th>The Open Space Audit will identify access to open space and provide contextual qualitative information on the quality of open space – will be reviewed as part of the update of “Rother in Profile”</th>
<th>Updated Spatial Portrait (Pending)</th>
</tr>
</thead>
<tbody>
<tr>
<td>EA</td>
<td>Waste: Improve on Baseline by providing further explanation, explain source of data. No supporting text regarding graphs on Waste, or background to waste issues in the district.</td>
<td>Noted Will be addressed as part of the update of “Rother in Profile” Cross reference to the Framework indicators and inclusion of additional waste indicators</td>
<td>Table 4, Section 5</td>
</tr>
<tr>
<td></td>
<td>Water Quality: Is water quality based on River Quality data or General Quality assessment data? Ground water sources should be addressed as part of the water quality section as these must be protected from pollution and contamination.</td>
<td>Noted Will be addressed as part of the update of “Rother in Profile” Cross reference to the Framework indicators and inclusion of additional water quality indicators</td>
<td>Table 4, Section 5</td>
</tr>
<tr>
<td></td>
<td>Climate Change Potential impacts of climate change</td>
<td>Additional information on climate change will be presented in the</td>
<td>Updated Spatial</td>
</tr>
<tr>
<td>Question 5</td>
<td>Do you agree with the main sustainability issues identified?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>------------</td>
<td>-------------------------------------------------------------</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>EA</strong></td>
<td>Important to highlight the consequences of climate change on the environment as well as the causes i.e., sea level rise, habitat change implication on the natural environment i.e., low river flows and extreme weather events</td>
<td>Agreed, mention of impacts on the environment and example given</td>
<td>Section 4, para 4.12</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Question 6</th>
<th>Are there any issues that should be added or removed?</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>EA</strong></td>
<td>Include issue of: Integration of management systems for waste from all sources i.e., commercial and industrial waste. All waste management figures, not just landfill and recycling. That which is composted should be separated out. Make specific reference to diversion of Biodegradable Municipal Waste from Landfill</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Question 7</th>
<th>Do you agree with the focus and direction of the sustainability objectives?</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>CA</strong></td>
<td>Reference to achieving high quality of design that respects and enhances local distinctiveness is required</td>
</tr>
<tr>
<td>EA</td>
<td>Objective 19 deals with water quality and water resources. This should be made into two distinct objectives.</td>
</tr>
<tr>
<td>----</td>
<td>------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>EA</td>
<td>Objectives should be strengthened by the inclusion of more specific indicators.</td>
</tr>
</tbody>
</table>

**Question 8 Do you consider that the indicators are appropriate, in that they will satisfactorily identify trends and assist monitoring and review?**

<table>
<thead>
<tr>
<th>CA</th>
<th>Approve of use of Landscape Character Assessment. Landscape quality should also be used. Indicators on design should also be developed.</th>
<th>Noted</th>
<th>Table 4 Section 5</th>
</tr>
</thead>
<tbody>
<tr>
<td>CA</td>
<td>Develop indicators on the accessibility to the countryside, open spaces i.e., distance of households from open spaces, length of undisrupted footpaths/cycle routes, net gain and level of use of open spaces.</td>
<td>Accessibility to open space will be monitored under Objective 7 Accessibility to services and facilities. Net gain of footpaths/cycle routes is not presently monitored at District or County level.</td>
<td>Table 4 Section 5</td>
</tr>
<tr>
<td>EA</td>
<td>Objective 1 – add number of houses built to Ecohomes / Breeam / other efficiency standards.</td>
<td>This information is not available. Propose to consider the future monitoring of homes built to Code for Sustainable Home standards.</td>
<td>Not available</td>
</tr>
<tr>
<td>EA</td>
<td>Objective 2 – Strengthen indicators relating to flood risk. Add percentage of new development with SuDS, number of properties on Environment Agency’s auto dialling service.</td>
<td>Two indicators to measure flood risk for the new flood risk Objective 12. Information on SuDS implementation not available. On further discussion with the EA it has been agreed the auto dialling indicator is not required.</td>
<td>Table 4 Section 5</td>
</tr>
<tr>
<td>EA</td>
<td>Objective 14 – Number and area of designated sites (SSSI, AONB, SNCI etc), percentage of land in SSSI in favourable condition, unfavourable but recovering, length of hedgerows, area of land managed primarily for biodiversity in urban/or rural nature reserves, Area of ancient semi-natural woodland or as a percentage of total land area.</td>
<td>Indicators covering condition of SSSIs, number and area of SNCIs and national and internationally designated sites and ancient semi-natural woodland.</td>
<td>Table 4 Section 5</td>
</tr>
<tr>
<td>EA</td>
<td>Objective 18 – BMW sent to/ diverted from landfill, Waste collected/recycled from other sources i.e., commercial and industrial, Composting and other waste management options</td>
<td>Waste Objective 16 – associated indicators now include % household waste collected for compost and landfill as well as recycling figures. Commercial and industrial waste is not presently monitored at District or County level.</td>
<td>Table 4 Section 5</td>
</tr>
<tr>
<td>EA</td>
<td>Objective 19 – More indicators suggested relating to water quality of the District’s rivers and coastline.</td>
<td>Water quality Objective 13 – associated indicators now include water quality of rivers and the sea</td>
<td>Table 4 Section 5</td>
</tr>
<tr>
<td>EA</td>
<td>Objective 20 – additional indicators relating to sustainable water resources management.</td>
<td>Water quality Objective 13 – associated indicators now include water consumption per</td>
<td>Table 4 Section 5</td>
</tr>
</tbody>
</table>
Household. Information on SuDS implementation not available

**Question 9 Are you able to provide data on biodiversity or drinking water quality?**

| EA | State of the Environment report will provide information and data on biodiversity/drinking water quality. LA should meet challenges of Water Directive framework, SSSI and BAP targets. Water Directive sets standard for water quality to reach good status by 2015. Targets should be reflected in Core Strategy DPD. |
| State of the Environment Report and Water Directive Framework reviewed as part of Task A1, targets have been identified and highlighted in review. |
| Appendix 1 |
### Appendix 3 - January - February 2008 SA Scoping Report Consultation

<table>
<thead>
<tr>
<th>Comment</th>
<th>Response</th>
<th>Where in Report</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>The Environment Agency – email response from Claerwyn Hughes (17.01.08)</strong></td>
<td>Duly noted</td>
<td>N / A</td>
</tr>
<tr>
<td>The EA are happy with the revisions made</td>
<td>Duly noted</td>
<td>N / A</td>
</tr>
<tr>
<td><strong>English Heritage – email response from Alan Byrne Historic Areas &amp; Planning Adviser Kent &amp; East Sussex Team (08.02.08)</strong></td>
<td>Duly noted</td>
<td>N / A</td>
</tr>
<tr>
<td>I can confirm that it provides a suitable framework for consideration of the historic environment aspects of the sustainability appraisal of the Rother LDF. All the appropriate sources of baseline data are included and that relevant documents are included; I am not aware of any others that may be included at this time</td>
<td>Duly noted</td>
<td>N / A</td>
</tr>
<tr>
<td><strong>Natural England – formal letter (emailed) response from Rebecca Pearson Environmental Planning Advisor (08.02.08)</strong></td>
<td>Reference to CROW now made and CROW Act reviewed in context review</td>
<td>Table 3 and Appendix 1</td>
</tr>
<tr>
<td>Section 1.5.7 We note this section which applies to appropriate assessment and would advise that the following is incorporated such that it reads:</td>
<td>Amended accordingly</td>
<td>Section 1.5.7</td>
</tr>
<tr>
<td>Stage 1 Screening: determining whether the plan either alone or ‘in combination’ with other plans and projects – is likely to have a significant effect on the interest features of a European site, either directly or indirectly.</td>
<td>Amended accordingly</td>
<td>Section 1.5.7</td>
</tr>
<tr>
<td>Stage 2: Appropriate Assessment: determining whether in view of the site’s conservation objectives, the plan either alone ‘in combination’ with other plans and projects – would have an adverse effect (or risk of this) on the integrity of the site(s). If it doesn't or if any adverse impact can be adequately mitigated for such as modifying a policy or proposal, further to consulting Natural England and JNCC, the plan can proceed.</td>
<td>Reference to CROW now made and CROW Act reviewed in context review</td>
<td>Table 3 and Appendix 1</td>
</tr>
<tr>
<td>We would advise that under the heading conserve and enhance biodiversity that reference is made to the Countryside and Rights of Way Act 2000, The Wildlife and Countryside Act 1981 (as amended) and the NERC Act 2007. We would also advise their inclusion into Appendix 1 with reference to</td>
<td>Reference to CROW now made and CROW Act reviewed in context review</td>
<td>Table 3 and Appendix 1</td>
</tr>
</tbody>
</table>
Natural England would strongly advise that the Environmental section more clearly incorporates the protection of natural landscapes such as AONB’s and that the provisions of PPG7 and the High Weald AONB management plan are clearly referenced. Throughout the document each section dealing with the natural and built environment concentrates strongly on the built environment leaving the natural environment lacking in detail. We note however that the Sustainability Appraisal Framework does include further detail regarding the natural environment. This is not echoed, however, throughout the document.

We would welcome the incorporation of the following target as presented on page 28 to be implemented into the LDF. “To establish a network of protected areas to maintain both the distribution and abundance of threatened species and habitats.” Natural England would suggest that such a target would encompass the provisions of PPS9 and the protection of networks of natural habitats. We would welcome the provision of a policy to both identify and protect networks of natural habitats in Rother’s LDF. We strongly support the recognition of this in the Framework Table (reiterated later).

P30
For clarity the UKBAP identifies a suite of habitats and species to be conserved and enhanced. This does not relate to energy efficiency but calls for the identification of these habitats and species, and for the adoption of action plans to implement their conservation and enhancement, with a view to halting their decline. This section should be amended with appropriate wording for this legislation.

PPS9-we would advise that reference is made to protected species and key protected and BAP habitats within Rother’s district e.g. ancient woodland. Reference should also be made to the protection of networks of natural habitats.

| statutorily protected sites and protected species. | Duly noted. Key messages from context review now revised to read: “Protect the historic environment and landscape” | Table 3 |
| Natural England would strongly advise that the Environmental section more clearly incorporates the protection of natural landscapes such as AONB’s and that the provisions of PPG7 and the High Weald AONB management plan are clearly referenced. Throughout the document each section dealing with the natural and built environment concentrates strongly on the built environment leaving the natural environment lacking in detail. We note however that the Sustainability Appraisal Framework does include further detail regarding the natural environment. This is not echoed, however, throughout the document. | Duly noted. Target added to table in Appendix 1 in “LDF implications” column and into SA Framework decision-aiding questions | Appendix 1 Table 4 – SA Framework |
| We would welcome the incorporation of the following target as presented on page 28 to be implemented into the LDF. “To establish a network of protected areas to maintain both the distribution and abundance of threatened species and habitats.” Natural England would suggest that such a target would encompass the provisions of PPS9 and the protection of networks of natural habitats. We would welcome the provision of a policy to both identify and protect networks of natural habitats in Rother’s LDF. We strongly support the recognition of this in the Framework Table (reiterated later). | Amended accordingly | Appendix 1 |
| P30
For clarity the UKBAP identifies a suite of habitats and species to be conserved and enhanced. This does not relate to energy efficiency but calls for the identification of these habitats and species, and for the adoption of action plans to implement their conservation and enhancement, with a view to halting their decline. This section should be amended with appropriate wording for this legislation. | Amended accordingly | Appendix 1 |
| PPS9-we would advise that reference is made to protected species and key protected and BAP habitats within Rother’s district e.g. ancient woodland. Reference should also be made to the protection of networks of natural habitats. | Amended accordingly | Appendix 1 |
| Again no clear mention is made in this section of AONBs and landscape designations. Natural England would suggest that such a target would encompass the provisions of PPS9 and the protection of networks of natural habitats. | PPS9 makes no reference to AONB or | N / A |
England advises that this is revised.

<table>
<thead>
<tr>
<th>Appendix 2 Baseline</th>
</tr>
</thead>
<tbody>
<tr>
<td>Page 51</td>
</tr>
<tr>
<td>2 Improve the health and well-being of the population and reduce inequalities in health PPG17- We would advise that reference is made to the benefits of access to a high quality natural environment for recreation and well being.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Landscape picked up under CROW addition raised earlier</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reference now made to access to natural and semi-natural open/green space</td>
</tr>
</tbody>
</table>

| Sussex Biodiversity Records Centre monitors BAP species and habitats |
| Related indicators under biodiversity objective serve as proxy for AONB state of health e.g. stock of ancient woodland and loss of hedgerows |

| Page 56 |
| 14 Conserve and enhance biodiversity |
| This should include Local Nature Reserves within Rother District, BAP habitats and species, and protected species. |

| N / A |
| 15 Protect and enhance the high quality natural and built environment |
| No reference is made to protection of the natural environment although it is referenced clearly in Rother in Profile. Once more landscape designations should be clearly included here. |

| Appendix 2 |
| Sustainability Appraisal Framework for the assessment of Rother Core Strategy. |
| Natural England would suggest that the promotion of the enjoyment of the natural environment is strongly included. This could for example, have a decision aiding question such as does the option/policy improve access to natural green space? We would also advise that this is linked to the provision of green infrastructure and that appropriate policies are secured to this end. Such policies if appropriately designed can also adhere to the requirements of PPS9. |

| N / A |
| Indicators for this section could include Natural England’s recommends that people living in towns and cities should have: |
| • An accessible natural green space less than 300 metres (in a straight line) from home |
| • Statutory Local Nature Reserves provided at a minimum level of one ha per thousand people |
| • At least one accessible 20 ha site within 2km |

| Appendix 2 |
| Noted. Decision aiding question already asks if option would improve access to open space – wording changed to read: natural and semi-natural green space. |

| Monitoring in line with government core indicators and PPG17 Audit |
of home; one accessible site within 5km of home; and one accessible site of 500 ha within 10km of home. This is also applicable to Objective 7

Natural England would encourage the inclusion of the percentage of homes with SUDS as an indicator for sustainable development and water conservation. Such methods can also provide biodiversity benefits such as the creation of wildlife habitats and safeguarding water resources.

Objective 14
Natural England welcomes the target to prevent and reverse habitat fragmentation. This is key to promoting viable natural habitats into the future, having clear parallels with the need to provide for climate change. Please find attached Natural England’s supporting statement for the adoption of Green Infrastructure/multifunctional ecological network policies within LDFs.

At present no clear indicators are presented to this end such as the area of habitat links secured. The provision of a multifunctional green network would contribute towards both the requirements of PPS9 and PPG17.

Natural England would again advise that clear reference is made to key BAP habitats and species and statutorily protected species.

We would also advise that targets such as no loss of ancient woodland are set and tied into strong policy.

The indicator of Condition of designated sites should also include unfavourable declining and unfavourable.

Objective 15
We note that this section provides the required detail for how the Sustainability Appraisal will account for Landscape designations and would advise that these are incorporated throughout the document and appendices.

| Natural England would encourage the inclusion of the percentage of homes with SUDS as an indicator for sustainable development and water conservation. Such methods can also provide biodiversity benefits such as the creation of wildlife habitats and safeguarding water resources. | Objective 14 | Natural England welcomes the target to prevent and reverse habitat fragmentation. This is key to promoting viable natural habitats into the future, having clear parallels with the need to provide for climate change. Please find attached Natural England’s supporting statement for the adoption of Green Infrastructure/multifunctional ecological network policies within LDFs. |
| At present no clear indicators are presented to this end such as the area of habitat links secured. The provision of a multifunctional green network would contribute towards both the requirements of PPS9 and PPG17. | Objective 14 | Natural England would again advise that clear reference is made to key BAP habitats and species and statutorily protected species. |
| We would also advise that targets such as no loss of ancient woodland are set and tied into strong policy. | Objective 15 | We note that this section provides the required detail for how the Sustainability Appraisal will account for Landscape designations and would advise that these are incorporated throughout the document and appendices. |
## Appendix 4 - Consultation with Natural England on AA Screening Report

<table>
<thead>
<tr>
<th>Reference</th>
<th>Comment</th>
<th>LA Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Page 6, Section 20</td>
<td>We note this section which applies to appropriate assessment and would advise that the following is incorporated such that it reads: <strong>Stage 1 Screening</strong>: determining whether the plan either alone or ‘in combination’ with other plans and projects – is likely to have a significant effect on the interest features of a European site, either directly or indirectly. <strong>Stage 2: Appropriate Assessment</strong>: determining whether in view of the site’s conservation objectives, the plan either alone ‘in combination’ with other plans and projects – would have an adverse effect (or risk of this) on the integrity of the site(s). If it doesn’t or if any adverse impact can be adequately mitigated for such as modifying a policy or proposal, further to consulting Natural England and JNCC, the plan can proceed.</td>
<td>Amended accordingly Amended accordingly</td>
</tr>
<tr>
<td>Page 10 Section 1.7</td>
<td>Natural England would recommend that a greater emphasis is given to biodiversity enhancement for habitats and species than is currently cited in this section.</td>
<td>Duly noted</td>
</tr>
<tr>
<td>Page 16 Section 4.2</td>
<td>Natural England would advise that for the purposes of carrying out an appropriate assessment greater clarity and detail is needed in this section. For example Berwick Swan has been identified as a qualifying species but the SPA is designated for a number of species, only one of which is the Berwick Swan.</td>
<td>Amended accordingly</td>
</tr>
<tr>
<td>Section 4.3</td>
<td>The report has omitted the Ashdown Forest SPA designation which should be included in this section. The Ashdown Forest has been afforded the status of SPA due the fact it contains nationally important breeding populations of the Dartford warbler Sylvia undata and nightjar Caprimulgus europaeus. Natural England would also advise that Ashdown Forest has an additional qualifying feature of the great crested newt which should be include in this section.</td>
<td>Amended accordingly Amended accordingly</td>
</tr>
<tr>
<td>Page 18 Section 5.2</td>
<td>We would recommend that the potential impacts of water pollution on international sites is more clearly emphasised in this section. For example, Pevensey Levels Ramsar is currently deleteriously impacted by eutrophication. This direct impact comes via sewage effluent entering the ditches within the Ramsar Site from the Hailsham Sewage Treatment works.</td>
<td>Amended accordingly</td>
</tr>
<tr>
<td>Page 20 Section 7.4</td>
<td>Natural England would advise that the impacts of visitor pressure and atmospheric pollution should be included as potential impacts to Dungeness SAC and SPA as explained below.</td>
<td>Potential impacts now screened in</td>
</tr>
<tr>
<td>Dungeness SAC Page 48-49</td>
<td>Protected Species outside the SAC Natural England requires further clarification as to the inference that there will be no impact on protected</td>
<td>Potential impact</td>
</tr>
</tbody>
</table>
species outside the SAC. It must be clearly evidenced that no proposed development site within the LDF has the potential to support populations of great crested newts within the SAC. Natural England would advise that for the purposes of dismissing this as a potential impact on the SAC additional information on the allocated sites is required with clear justification as to why they are unsuitable for this species.

Recreation Pressure and Disturbance
Natural England would not agree from the evidence provided that the potential impact of recreation and disturbance on the SAC can be ruled out at this stage. We would require additional information and clear evidence to be produced prior to this potential impact being ruled out.

The shingle vegetation within he SAC is highly vulnerable to disturbance. Rye Harbour is a very popular visitor attraction and Natural England would not agree that a 5km radius is an appropriate cut off point beyond which it is inferred that people will not regularly visit the site. We require justification as to why this distance has been cited particularly with reference to the precautionary principle. We would also require evidence regarding the statement that: The core strategy does not propose a significant quantity of new dwellings in the eastern side of the district.

We advise that this does not negate the requirement for an Appropriate Assessment. Natural England recommends that the report clearly references the quantities of housing proposed together with justification as to why such numbers are not deemed significant for the purposes of carrying out an Appropriate Assessment on the potential impacts of recreational disturbance on the SAC. This effect should also be considered in-combination with neighbouring local authorities’ plans and projects.

Changes in pollution levels
We advise that this potential impact should be considered in-combination with neighbouring districts as per the requirements of the Habitats Regulations. This is particularly pertinent when considering the existing high levels of atmospheric pollutants and their impacts on sensitive habitats within the SAC. The screening matrix only mentions development in the proximity of the site within the Council’s ownership. Natural England would require an assessment of air pollution to be considered in combination with other local authority’s plans and projects. This has not been carried out and therefore the impact of air pollution on the SAC cannot be dismissed at this stage.

<table>
<thead>
<tr>
<th>Dungeness SPA</th>
<th>Page 51 Impact on Protected Species outside the Protected Site</th>
<th>Potential impact now screened in</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Again Natural England would require clarification of the nature of the proposed development sites and</td>
<td>Potential impact now screened in</td>
</tr>
</tbody>
</table>
evidence to clearly demonstrate that these areas are not used by protected species within the SPA. Such information would be necessary as a minimum prior to dismissing this as a potential impact to the SPA.

Recreational pressure & Disturbance
Natural England reiterates comments made on this potential impact to the SPA. Again we would require clear evidence to show why 5km has been used as a boundary beyond which this impact is negated. We would strongly advise that this is revised with appropriate evidence, giving due regard to the precautionary principle.

Page 52 Changes in Pollution Levels
We reiterate our comments provided above with regard to the SAC. Again we would advise that an in-combination assessment is required.
We also advise that potential impacts to Ashdown Forest SPA are included in this section.

| 5km radius was used in line with Natural England guidance for Thames Basin Heath as documented in the September 2006 Guidance. Also seen in approved AA screening reports. Potential impact now screened in |  |
| Potential impact now screened in SPA now included |

---

4 Scott Wilson, Levett-Therivel Sustainability Consultants, Treweek Environmental Consultants and Land Use Consultants *Appropriate Assessment of Plans* (September 2006)
Appendix 5 – Representations received to the Issues and Options document and how responses have influenced the Strategy Direction Document

The individual comments received (in some cases summarised) are available to view on the website at www.rother.gov.uk.

Local Issues and Themes

Question 1
What are the key issues for development and change up to 2026?
In considering this, you are invited to comment specifically on:
Are the ‘broad themes’ correctly defined?
Are the key issues correctly defined?
Does the Profile fairly reflect the main characteristics of the district?
Are the ‘drivers of change’ in the Profile correct, and are any more significant?

Responses to this Question: total number 36

Howard Hutton & Associates (Mr. Roger Hutton) [4927]
Aroncorp Ltd [4935]
Kember Loudon Williams Ltd (Mr. Roger Nightingale) [4925]
Hastings and Rother Primary Care Trust (Mr. Richard Watson) [4938]
Crowhurst Parish Council (Mrs. Pat Buckle) [4950]
Etchingham Parish Council (Mrs. S. Cobain) [4954]
Rye Town Council (Mr. Richard Farhall) [4956]
Hastings Borough Council (Mr. Roy Mawford) [4960]
Rye Conservation Society (Mr. K.R.F Bird) [4962]
Croudace Strategic Limited [4967]
Rastrum Ltd [4973]
Mrs. P.C Ward-Jones [4978]
English Village Projects [5002]
Mr. B.R Streat [5005]
Highways Agency (Mrs. Margaret Pratt) [5007]
Bexhill and District Gardens & Allotments Society (Mr. C.R. Bryen)[5009]
PREM (Rooster) Limited (Mr. Richard Thomas) [5011]
East Sussex County Council (Mr. Nick Claxon) [5015]
Government Office for the South East (Ms. Philippa Sambrook)[5022]
The Crown Estate [5030]
Rother Homes (Mr. Tony Streeter) [5034]
RSPB (Ms Harriet Dennison) [5036]
McCarthy and Stone UK Ltd. [5037]
Land Securities plc [5047]
The National Trust (Ms. Jane Arnott) [5052]
BALI (Mr. Nick Hollington) [5054]
Forestry Commission (Ms. Jane Hull) [5056]
Persimmon Homes (South East Limited)[5059]
Wealden District Council (Mr. Alexei Zammit) [5063]
Mr. David Vereker [5065]
Rother Voluntary Action (Mr. M.J.Fisher) [5067]
Southern Water (Ms Susan Solbra) [5070]
Main Points and Common themes

There were a large number of responses to question 1; however the responses received were quite diverse and there is mixed opinion to whether the themes, issues and the profile were correct. The main issues raised include:

Concern over historic, cultural and natural environments and their importance to sustainability
Suggestion that Rother and Hastings Issues and Options should complement each other
There should be a rural and urban coastal split
Larger villages should act as service centre hubs for transport and facilities
Water, waste, tidal/fluviial flood management
Rother needs to become more attractive to outside investment

Local Authorities and Government Bodies

County and Borough Councils
East Sussex County Council comments on how the historic environment and cultural heritage is a key aspect of sustainability. Once it is destroyed it cannot be replaced. This aspect needs to be better understood and used to make informed decisions about the future. Hastings Borough Council congratulates Rother on the quality of the document and welcomes the clear reference to 'Shaping Hastings'. Wealden District Council thinks that the common factors between Rother and Wealden are the High Weald AONB and Pevensey Levels RAMSAR site and the catchments areas of the River Rother and Wallers Haven.

Town and Parish Councils
Rye Town Council agrees with the key issue identified but suggests that paragraph 3.12 should acknowledge the eastern end of the district’s connectivity with Ashford. The ‘drivers for change’ need to be focused on transports (road and rail development). Crowhurst Parish Council agrees with all four parts of the question. Etchingham Parish Council thinks that the document fairly accurately reflects the characteristics of the district and its population’s aspirations.

Other
Highways Agency thinks that an Evaluation of the Transport Impact (ETI) of the LDF proposals as a whole will be required. The Government Office for the South East would like evidence that Rother District Council is working towards making the key strategic decisions needed by the preferred options to address housing and other strategic redevelopment requirements in accordance with PPS12 paragraph 2.10. They think the aims 1-5 are weak in providing the strategic objectives required by PPS12 paragraph 2. They suggest looking at Hastings Core Strategy objectives and how Rother might complement these.
Hastings and Rother Primary Care Trust suggest that Theme 5’s title should be Access to Community Infrastructure and Facilities. For the key issues, it should read “providing high standards and easy access to education and healthcare”

Development Interests
Howard Hutton thinks that ‘Rother in Profile’ is well written and informative. The issues which need to be tackled by emerging Core Strategy are economic weakness, lack of affordable housing and poor connectivity. Aroncorp would like the Core Strategy to ensure everyone has the opportunity to live in a decent home in accordance to PPS3. Kember Loudon Williams Ltd would like the theme reworded to “What are the most effective and appropriate means of enhancing the vitality and viability of the Districts economy so as to provide the opportunity to increase the income available to local people, including via a range of career and learning opportunities, to support improvements in people’s standard of living.”

Croudace Strategic Limited considers that the 5 themes cover the main issue affecting the district. However the corresponding ‘Drivers for Change’ place too much concentration on the need to develop the urban coastal area and limit growths for rural towns and villages. PREM (Rooster) Limited opinion is that Rother has three towns and seven large villages, which can be expected to be the focus of community services and facilities. Growth should be directed to the places where there such facilitates are already in place.

The Crown Estate supports the need for safe balanced inclusive communities. They think this objective should recognise the role of rural communities and the importance in retaining local facilities and services to reduce reliance on the car. Affordable housing is also a key issue for rural communities by allowing the young and the old to remain living within their communities.

McCarthy and Stone Ltd think that Rother should concentrate on the following things prior to and during development of the preferred options on affordable housing: developing effective measures to engage with stakeholders, producing a comprehensive spatial strategy with priorities linked to the community strategy, forming policy options through a collaborative approach with the development industry and accessing through consultation and sustainability appraisal, a range of options to deliver the required amount of affordable housing identifies in the spatial strategy and policy options.

Land Securities plc supports the issues and options brought forward in the Core Strategy. They believe the preferred options should focus on retail. Effective recreation and community facilities are essential for viability of the District, and such locations should be identified.

Persimmon Homes considers that the themes do not properly reflect the need to provide the strategic housing requirement. Their view is that the overall housing numbers in Rother will rise and the old Structure Plan numbers are out of date. The Core Strategy should be flexible enough to accommodate substantially higher levels of housing.
Environmental Groups and Community Bodies
Rye Conservation Society notes that ‘Rother in Profile’ does not identify existing and proposed SSSIs which a significant constraint to future development is. The ‘Drivers for Change’ give insufficient weight to growing public demand for localisation of services and government within the principle of subsidiarity promoted by the EU.

English Village Projects thinks that the themes and key issues are too broad and suggest that securing the villages future should be singled out. Bexhill and District Gardens and Allotments Society thinks that “the Future” should reflect the needs and aspirations of local people and communities and not what the Councils feels should be the views of people. RSPB supports the themes in particular the inclusion of theme 4. They suggest a more inclusive map detailing the hierarchy of international, national, regional and locally designated sites is recommended. Sites should be identified for restoration or creation of priority habitats that contributes to regional targets in accordance with PPS9.

The National Trust agrees with the main issues for the District over the next 20 years and believes that more emphasis should be given to the enhancement and protection of the unique character of the District. BALI thinks that there is too much jargon in the document. They think that the key issues are too broad. Managing waste and water are equally aspects of Theme 4 and Theme 5. The profile of section 3 and 4 does not put enough emphasis on the environment and the sections on environment and transport are weak. The Forestry Commission thinks that generally the themes are comprehensive and the issues well defined but thinks that the ancient woodland would be better off dealt in paragraph 8.11.

Rother Voluntary Action complains that under Theme 1 it is not considered that either affordable housing or community support network is a key issue. They are confused what is meant by balanced. For Theme 2 they suggest that prosperity cannot be guaranteed and it is not achievable but you can create a range of opportunities, with an enabling environment. In Theme 4 they think that quality is not a theme or a key issue, and is the wrong one for the environment. For Theme 5 Community Infrastructure and facilities is not a satisfactory theme and appears to be a ‘catch all’. The key issues and themes should be rephrased to Environmental Sustainability to ‘ensure that the urban and green environments are ecologically, socially and economically sustainable’. Social Sustainability to ‘ensure that we have peaceful and prosperous communities’. Economic Sustainability ‘enlarges and strengthens the economic base of the District’. Relevant and sufficient support infrastructure to ‘ensure that the necessary infrastructure to support sustainable communities is in place. Transport and Accessibility to ‘address the need for people to move around using alternatives to private cars.’ The driver for change section needs to be strengthened.

The Environment Agency think the key issues are tidal and fluvial flood risk, conservation of river and marine habitats, water quality, contamination—specifically with the Rye harbour area, water resources, sustainable construction and climate change. Sports England, South East Region believes that existing sites and facilities used for sport and recreation are protected and enhanced. There is concern that the theme only protects high quality environments however, some sports facilities are not
Natural England would like the visual description of the area to be expanded. Much of Rother is AONB because of its rolling hills, small irregular fields, abundant woods and hedges, scattered farmsteads and sunken lanes. They would like to see Pevensey Marshes/Levels and Romney Marsh description expanded. They note that there is no mention of energy consumption by the existing housing stock. They suggest that the High Weald AONB website is added to the documents that alterations are made to the paragraph on International Nature Conservation sites for clarity, and note that Pevensey Levels are listed as a Ramsar Site under the Ramsar Convention for Wetlands.

Natural England believes that Rother in Profile needs to formally recognise ancient woodland as they are of irreplaceable heritage, wildlife habitat and landscape value. A combination of renewable energy including micro-generation projects such as wood biomass, solar and wind turbine and more use of public transport could lead to reduced emission. They think the LDF should adopt the standards for the targets for the provision of Green Infrastructure and planned urban extensions to meet Accessible Natural Greenspace Standards (ANGST). Green infrastructure should be given equal weight to the other infrastructure required to develop the expanding and new sustainable communities. Rother District Council should follow other local authority’s example and incorporate the Natural England’s recommendations that people living in towns should have an accessible natural green space less than 300 metres from home; Statutory Local Nature Reserves provided at a minimum level of one ha per thousand people; at least one accessible 20 ha site within 2 km of home; one accessible site of 100 ha within 5 km of home and one accessible site of 500 ha within 10 km of home. Natural England supports the inclusion of High Weald AONB Management Plan and suggests that the Sussex Biodiversity Action Plan is also included as the Rother District has such an important range of habitats and species that need safeguarding.

Businesses
Rastrum Ltd sees the demographic profile of Rother as an issue, as retired people have a low household income and place a greater demand on healthcare facilities. Rother employment is also generally low skilled, therefore has a lower earning capacity. The LDF needs to make Rother a more attractive place to invest and increase employment opportunities for the young.

Rother Homes consider broad themes, key issues, profile and driver for change to be accurate and appropriate. Southern Water thinks there is a need to include efficient and sustainable use of infrastructure and protection of amenity. Three ways to achieve efficient and sustainable use of water and wastewater infrastructure:-
Co-ordinated whole site approach to large sites, separation of surface water from foul sewers, large site sewers to adoptable standards. Rother Valley Railway would like to see all the railways in the district shown.

Individuals
The few individuals that responded are generally unhappy with the approach.
How responses have been addressed in the Strategy Directions Document

The importance of effective environmental stewardship is strongly highlighted within the Policy Directions document, and individual attention given to the main areas of concern, notably the natural and historic landscape, bio-diversity, flood risk and other climate change issues (under the umbrella of Sustainable Resource Management).

A sub-section devoted to water resources, including flood risk is incorporated into the Environmental section.

The key relationship between Bexhill and Hastings has been pursued through development of a 'shared vision' for the two towns by the respective Councils.

Differences between different parts of Rother district are duly addressed by sections on each town and the rural area. The Rural Areas section is supported by a study that examines the unique characteristics of all the main villages, as well as the relationship with smaller settlements. Hence, while the strategy has, necessarily, to take a strategic approach, it will also take a local perspective.

Economic regeneration and growth is a prime aim of the strategy with particular emphasis in the coastal towns. The Strategy provides a distinction between Bexhill and Rye, and the villages and countryside within the coastal area.

Further attention has been given to retailing in each town, while the review of employment land has also addressed wider economic strategy issues.
Local Issues and Themes

Question 2

How should future uncertainties be managed?

In considering this, you are invited to comment specifically on
What approach to the rate of growth is most appropriate for Rother?

Responses to this Question: total number 15

Howard and Hutton & Associates (Mr Roger Hutton) [4927]
Aroncorp Ltd [4935]
Kember Loudon Williams Ltd (Mr. Roger Nightingale) [4925]
Crowhurst Parish Council (Mrs. Pat Buckle) [4950]
Croudace Strategic Limited [4967]
Rastrum Ltd. [4973]
English Village Projects [5002]
BALI (Mr. Nick Hollington) [5054]
Forestry Commission (Ms. Jane Hull) [5056]
Strutt & Parker (Mr. Craig Noel) [5058]
Persimmon Homes (South East Limited0 [5059]
Mr. David Vereker [5065]
Rother Voluntary Action (Mr.M.J Fisher) [5067]
McCarthy and Stone UK Ltd. [5037]
Natural England (Mr. Kristoffer Hewitt) [5088]

Main Points and Common Themes

The responses from this section were mainly from development interests. Local authorities and government organisations, environment groups and community bodies made up a smaller proportion of the comments received. The key issues which can be drawn from this question are:

Bold approach required in the form of a large strategic site allocation to meet affordable housing need
Appropriate infrastructure key to growth
Conservative approach to growth
Economic regeneration and growth should be encouraged
Balanced service provision for young and old
Climate change is an issue effecting Rother. Opportunity for exploration of renewable energy

Local Authorities and Government Organisations
Parish Councils
Crowhurst Parish Council thinks that the village action plans should reduce uncertainty. They do not agree with paragraph 3.24 “early growth impetus” and would prefer a steady growth strategy. They also warn that the link road may not be the answer to the growth problems.
Development interests

Howard Hutton & Associates see that many local authorities after years of avoiding development, now see growth as a way to bring urban renewal, increased employment, housing and general prosperity. They believe uncertainty can be addressed by the Plan, Monitor and Manage approach. Aroncorp Ltd view is that the high need for affordable housing dictates a bold approach for Rother. However paragraphs 3.21

“While maintaining a steady rate of development is desirable in terms of a continuity of supply of accommodation, Rother faces particular difficulties in achieving this.”

and 3.22

“The economy remains relatively weak in the region and despite regeneration efforts, could take time to improve. Also the growth is dependent upon new infrastructure, notably the Bexhill and Hastings Link Road and, hence, is vulnerable to delays in it.”

will not secure the step change in the provision for affordable housing. They suggest that a bold approach should come in the form of large strategic site allocation where development of a meaningful quantity of affordable housing can be assured.

Kember Loudon Williams Ltd wants a Core Strategy that stimulates growth and provides the opportunities for investment. They want to see a proactive approach, and opportunities to create economic growth.

Croudace supports the proposed Core Strategy time frame, however it would like to be flexible enough to respond to change. Rastrum Ltd believes that a conservative approach to growth is likely to produce a half-hearted and self defeating policy. They would like the LDF to be bold with achievable goals that will have a tangible effect on economic regeneration. By alleviating the infrastructure problems associated with Rother it will become more attractive to outside investors.

Strutt & Parker think that the provision of appropriate infrastructure is key to growth however, its process is characterised by delays and increased costs. Therefore decisions should not be delayed to accommodate new growth. Persimmon Homes thinks the Core Strategy has to be robust enough to accommodate a range of options. The spatial opinions should be assessed through the SA/SEA process and set out clearly when the Preferred Options are published. McCarthy and Stone Ltd believe that services should be balanced so everyone is catered for.

Environmental Groups and Communities Bodies

English Village Projects want caution to be placed over open space loss. BALI agrees that the conservative approach to growth is best though dynamic opportunities for regeneration which are environmentally friendly should be sought. The Forestry Commission believes that climate change is an issue of great importance to Rother and adapting to these challenges brings opportunities for renewable energy. Wood fuel is the most obvious example. Natural England like the Forestry Commission see climate change as an issue as Rother as it has coastal
regions, and areas of floodplains. They too think that it can be treated as an opportunity to mitigate impacts of renewable energy.

**Individuals**

Agree with paragraph 3.23 “conservative approach to growth”

---

**How responses have been addressed in the Strategy Directions Document**

The document notes how future challenges can be hard to predict and therefore the Core Strategy must remain flexible to manage uncertainty. This is especially significant locally given the reliance on planned infrastructure, notably transport. For this reason, clear contingencies are set out.

It is the aim of the Overall Spatial Development Strategy to achieve a pattern of activity and development that responds positively to the South East Plan and the area’s particular local circumstances and environmental resources.

Government asks that consideration be given to housing levels in excess of (but not below) the South East Plan requirement. This has been explicitly considered, but the appraisal indicates that there would be considerable negative environmental impacts.

New sections now on Infrastructure and Implementation to address concerns over delivery of infrastructure.

Specific reference to ‘young’ and ‘old’ persons added to ensure balance of service provision.

The provision of affordable housing is supported as an overall objective and the supply should increase in the Core Strategy period. This subject is dealt with in the Communities section where it is stated that a preferred strategy is to secure improved provision of affordable housing to address the local need.

In terms of employment, the aim is to secure sustainable economic growth for existing and future residents. It is recognised that growth should be “economy-led” to be sustainable.

Under the Communities section, objectives include:

- ensure ease of access to doctors surgeries
- encourage more young people to stay, return or be attracted to Rother as a place to live and work

It is suggested that there must be a greater awareness and sharper response to global warming and climate change, the process of which remains uncertain. Section 11 on the Environment proposes policies which will identify areas for strategic renewable and low carbon generation and supporting infrastructure.

---

**Vision and Objectives**
**Question 3. What should the overall aims of the Core Strategy be?**

*In considering this, you are invited to comment specifically on:*

- **The current Local Plan aims**
- **The refinements at (a) – (h) above. (as contained at paragraph 4.13 in Core Strategy Issues and Options)**
- **Any further aims which you regard as important**

**Responses to this Question:** total number 30

Who Responded
Howard Hutton & Associates (Mr. Roger Hutton) [4927]
Aroncorp Ltd [4935]
Kember Loudon Williams Ltd (Mr. Roger Nightingale) [4925]
Hastings and Rother Primary Care Trust (Mr. Richard Watson) [4938]
High Weald AONB Unit (Mr. Andrew Shaw) [4944]
Learning and Skills Council (Mr. Paul Stoggles) [4948]
Crowhurst Parish Council (Mrs. Pat Buckle) [4950]
Etchingham Parish Council (Mrs. S. Cobain) [4954]
Rye Town Council (Mr. Richard Farhall) [4956]
Hastings Borough Council (Mr. Roy Mawford) [4960]
Rye Conservation Society (Mr. K.R.F Bird) [4962]
Croudace Strategic Limited [4967]
Rastrum Ltd [4973]
Mr. John Royle [4987]
English Village Projects [5002]
East Sussex County Council (Mr. Nick Claxon) [5015]
Sainsbury’s Supermarket [5026]
Rother Homes (Mr. Tony Streeter) [5034]
Mr. Christopher Strangeways [5040]
Rother Environmental Group (Mr. Dominic Manning) [5045]
Ms. Pat Field [5046]
Land Securities plc [5047]
The National Trust (Ms. Jane Arnott) [5052]
Bali (Mr. Nick Hollington) [5054]
Pestalozzi International Village (Ms. Thea Platt) [5061]
Mr. David Vereker [5065]
Rother Voluntary Action (Mr. M J Fisher) [5067]
Rother Valley Railway (Mr. S.G.N. Bennett) [5084]
Sports England South East Region (Mr. Mick Anson) [5086]
Natural England (Mr. Kristoffer Hewitt) [5088]
Main Points and Common Themes

The responses came from a broad sector of recipients which included local authorities and government organisations, environment groups and community bodies, large and small local businesses, development interests and individuals. Main issues in respect of proposed aims related to:

Enhanced education provision to help create a skilled workforce
The importance of enhancing and conserving the countryside
Hastings and Rother should work on a more joined up strategy
The importance of providing a decent home for everyone
The need for regeneration
Ensure new development is carried out in a sustainable way

Local Authorities and Government Organisations

County and Borough Councils
At County level Aim 2 “to ensure that there is adequate infrastructure and services to support thriving communities and facilitate new development” is supported, but emphasis should be placed on partnership. A suggested additional aim would be “supporting enhanced education provision to raise aspirations and attainment levels to create a skilled workforce to deliver social and economic aims.” Hastings Borough Council is concerned that there is no reference to cross boundary issues and want to see a more joined up approach between Hastings and Rother.

Town and Parish Councils
Rye Town Council thinks the aims identified at 4.8 are laudable and Aim 5 (transport) should be prioritised. 4.13 and 4.14 should also be taken forward. Etchingham Parish Council believes that the aims of the Core Strategy should be to maximise output from existing resources by greater efficiency in their use. Crowhurst Parish Council agrees with refinements but also wants to promote faster road and rail links.

Other
Hastings and Rother Primary Care Trust suggest that pedestrians should have safe direct pathways, that distances are minimised and there is reliable safe public transport close to home. (h) “promoting more leisure and cultural opportunities as a basis for a healthy community life” could be reworded to “providing a good standard and range of cultural opportunities to promote a healthy lifestyle”.

Development Interests
Howard Hutton & Associates state that the local plan is laudable but vague. Aroncorp believe that the aims should emphasise everyone’s right to live in a decent home in accordance to PPS 3. Kember Loudon Williams Ltd wants facilitating a return on investment to be recognised in the core strategy objectives and for regeneration to be included. They suggest Aim 4 To secure a more prosperous diverse economy” be amended to “To secure a more prosperous and diverse economy and recognise the factors that engender economic investment and regeneration.” Croudace Strategic believe that the refinements are sufficient, however an additional refinement should be added ensuring everyone has access to a decent home.
Environmental Groups and Community Bodies

B.A.L.I. agrees with aims but believe the vision should be bolder. They would like to see a clear environmental aim incorporating water, waste and energy. The High Weald AONB group want sustainability to be defined in local terms and that sustainable living is not just based on the proximity to services. Rye Conservation Society wants there to be some distinction in Aim 1 “To ensure that the environment is conserved and enhanced and that new development contributes to local character and cultural amenities”. That recognises that care of countryside and enhancements of the environment are not the same thing. Cultural heritage must find its place in the LDF. The Rother Environment Group thinks that the word ‘sustainable’ is used to loosely and that it should be stated that virtually none of Rother’s development is presently sustainable.

Natural England and the National Trust both support Aim 1; however they want to ensure the enhancement and conservation of the environment. The National Trust wants further focus on urban brownfield development to support future need. The Rother Valley Railway Trust sees the RVR link which connects mainline Robertsbridge Station with the KESR at Bodiam as achieving the ‘Sustainable development’ objective by reducing the need to travel to Rother by car. English Village Projects wants Aim 3 sustainability to be better understood and not skewed towards transport. They are also concerned with Aim 1 that that new developments must be sympathetic of local character and the mistakes of the past should be redressed.

The Sports England South East Region talk about how sport underpins people’s quality of life and it is fundamental to broader Government objectives. The LDF has a vital role to play and the planning system must embrace its role in achieving the Government’s objectives. Rother Voluntary Action point out, that the vision doesn’t take into account the aging population. They suggest that more emphasis should be placed on rural/coastal locations. The Learning and Skills Council agree with refinements. Their aims include improvement in basic skills and Level 2 achievements and will continue their involvement in the 14 to19 year olds agenda.

Businesses

Rastrum Ltd wants the Core Strategy aim to allow Rother to grow in an organic sustainable way, helping local businesses achieve their potential growth without damaging the environment. They suggest that a further aim should be the encouragement of development that improves sustainability. Land Securities support Aim 2 “To ensure that there is adequate infrastructure and services to support thriving communities and facilitate new development” but emphasise the need for improved retail investment in Bexhill. Rother Homes want to see greater focus to sustaining strong, safe supportive communities. Sainsbury support general aims and objectives. Pestalozzi International Village don’t think that long-term sustainability is at the forefront of the aims of the Core Strategy. They also wish to see more detailed information on waste, energy and transport with precise targets to be worked to. They want to see Rother to become a “flagship” example for sustainability that other districts can refer too. However, they see the Link Road to be in direct opposition to the concept of sustainability.
Individuals
Individual’s answers included the desire to see a more joined up approach between Hastings and Rother. With the increasing environmental constraints the vision needs to make sure development is built to the highest environmental standards. Concern over the 40% affordable housing ratio is mentioned along with dissatisfaction that planning policies can be seen to contradict with each other and that the long term aims will not be achieved due to financial constraints. Individuals seem to have a general dissatisfaction with the planning system.

How responses have been addressed in the Strategy Directions Document
The aims for the District have built upon those of the Local Plan, and now relate to specific areas of the District as well as thematic aims. They embrace the elements highlighted in the Issues and Options document, which were generally supported, either as a main aim or an objective. The aims also align with the new East Sussex Integrated Sustainable Community Strategy and have been discussed with the Rother LSP.

An objective in the Economy section of the document seeks to raise aspirations and improve educational attainment.

The Vision has been elaborated upon to include a clear spatial dimension.

Regeneration initiatives and employment trends are seen as drivers for change in Rother. In the overall spatial development strategy objectives for the district include:
To give particular attention to promoting economic regeneration and growth for the Hastings/Bexhill area.
To give particular attention to supporting the Market Towns roles of Battle and Rye
To give particular attention to meeting local needs and supporting vibrant mixed communities in the rural areas.

Sustainability is also an objective of the overall spatial development strategy with objective 2: ‘To guide sustainable development’. Also sustainable resource development is addressed within the Environment chapter, with strategy direction options including approaches to sustainable development.

The key relationship between Bexhill and Hastings is further explored through development of a ‘shared vision’.

Protection of the countryside is included in the aims for the Rural Areas by reference to its protection and enhancement. In addition an objective of the Rural Chapter seeks to respect and conserve the historic landscape mosaic, particularly in the High Weald AONB.

A range of measures are proposed to increase affordable housing - namely: lower thresholds 15 to 10 in Rye and Battle, 5 to 3 in rural areas, proposals to allocate solely or predominantly for affordable housing, exception sites, prioritising affordable housing ahead of market housing and possible increase to 50% threshold in rural areas- all of which responds to comments about access to housing as being a key element in the Vision.

Theme 1: Balanced Safe and Inclusive Communities
Question 4

How should we plan for the diverse needs of all sections of local communities, including in terms of the nature and affordability of housing, the need to feel safe and have a well developed community support networks?

In considering this, you are invited to comment specifically on:

Whether particular types of housing should be provided as a priority (e.g. affordable sheltered, smaller homes, family housing?)

How can the specific needs of both younger and older residents both be met?

What actions can best support rural communities?

Responses to this Question : total number 35

Howard Hutton & Associates (Mr. Roger Hutton) [4927]
Aroncorp Ltd [4935]
Kember Loudon Williams Ltd (Mr. Roger Nightingale) [4925]
Hastings and Rother Primary Care Trust (Mr. Richard Watson) [4938]
Crowhurst Parish Council (Mrs. Pat Buckle) [4950]
Etchingham Parish Council (Mrs. S. Cobain) [4954]
Rye Town Council (Mr. Richard Farhall) [4956]
Bodiam Parish Council (Mrs. H.E Lewis) [4954]
Rye Conservation Society (Mr. K.R.F Bird) [4962]
Croudace Strategic Limited [4967]
Fairview New Homes Ltd. [4970]
Rastrum Ltd [4973]
Mr. Miskin [4975]
English Village Projects [5002]
Mr. B.R Streat [5005]
Bexhill and District Garden and Allotment Society (Mr. C.R Bryen) [5009]
PREM (Rooster) Limited (Mr. Richard Thomas) [5011]
East Sussex County Council (Mr. Nick Claxon) [5015]
Home Builders Federation (Mr. Bart Wren) [5017]
Government office for South East (Ms. Philippa Sambrook) [5022]
The Crown Estate (Mr Steve Dring) [5030]
Rother Homes (Mr. Tony Streeter) [5034]
McCarthy and Stone UK LTD. (Mr. Greg Hilton) [5037]
Rother Environmental Group (Mr. Dominic Manning) [5045]
Strutt & Parker (Mr. Craig Noel) [5058]
Persimmon Homes (South East Limited) [5059]
Mr. David Vereker [5065]
Rother Voluntary Action (Mr. M.J Fisher) [5067]
Sussex Police (Mr. Martin Garrad) [5079]
Natural England (Mr. Kristoffer Hewitt) [5088]
Main Points and Common Themes
The responses came from a broad sector of recipients which included Parish, Borough and County Councils, environmental groups and community bodies, large and small local businesses, development interests and individuals. The development interests had the largest number of respondents.

The general and main points are:
Must consider need for the market as well as affordable housing
The need for affordable housing in rural areas
Rural area growth should be allowed
Plan, monitor manage philosophy to be centre of Core Strategy
Amount of affordable houses required will alter over life span of the LDF
Increased building of sheltered accommodation will free up existing housing stock
More focus on community infrastructure
Need to address Gypsies and Travellers accommodation

Councils
County Council
East Sussex County Council believes elderly housing needs should be catered for. This would include the provision of affordable sheltered accommodation. They also recommend that Rother District Council work with Health and Social Care to identify development options, which would accommodate the local need but would not encourage in migration of older residents.

Parish Councils
Crowhurst Parish Council want there to be an integrated mix of housing. They want locals to be listened to and their views respected especially concerning the link road and urban sprawl. Etchingham and Bodiam Parish Councils are concerned with lack of affordable housing. The demand is for small properties for young and old, highlighting the large number of elderly in inappropriate large properties. “A mix of housing supports good community support networks”. Rye Town Council would like to see affordable social housing for indigenous accommodation prioritised.

Other
The Government Office for South East note there is no reference to accommodation need for gypsies and travellers and should be interpreted before Preferred Option stage of consultation.

Development Interests
Virtually all the developers comments were centred around the issues of housing, affordable housing and the infrastructure needed. Howard Hutton & Associates want the Housing Needs Survey to include need for the market as well affordable housing. They suggest that this document is circulated in the form of a newsletter to local agents so they are aware of need and have opportunity to provide. Aroncorp Ltd is concerned that infrastructure funding will need to increase and be considered itself affordable (viable) in development terms. Kember Loudon Williams believe that type and size of housing should reflect market need at a given time. Rural areas should allow for modest growth to sustain services and communities.
Croudace believe that Core Strategy should be regularly updated and the Housing Market Assessment should be site specific. If Core Strategy restricts market housing in favour of affordable housings, its delivery may reduce. The Core Strategy should also facilitate development in rural areas. Fairview Ltd again want affordable housing policy to be site specific based on up to date Housing Needs Assessments. They also object to a specific housing mix being set and want flexibility for developer to determine residential composition based on market/commercial considerations, planning policy and environmental constraints. Without this, it erodes ability of private sector to respond to market demands.

Home Builders Federation want to see the plan, monitor manage philosophy to be centre of Core Strategy. The Crown Estate wants to see a mixture of housing in rural areas allowing the young and old to stay in the rural community. They also are concerned that pure affordable housing developments may become stigmatised so request an element of market housing in all new development.

McCarthy and Stone UK Ltd want affordable housing to be included within Core Strategy as a strategic objective. They raise the issue that the number of affordable houses required will alter over lifespan of strategy therefore precise numerical targets should be avoided. They also argue that development efforts should be concentrated on private sheltered housing because elderly often stay in own homes a long time resulting in under occupation. Freeing up these houses increases availability of family stock and elderly have access to more help in sheltered housing.

Strutt and Parker believe that affordability in rural sector should be a key focus. Through past experiences they have learnt the best way to deliver affordable housing in rural areas is through site allocation for general development underpinned by clear policies identifying amount of affordable housing. PREM Limited response to the question at the conclusion of this section “it is submitted that one of the best ways of encouraging local and rural businesses and facilities is to ensure that they have a chance of being well used and therefore profitable by allowing for growth to be accommodated in the larger village settlements”.

Environmental Groups and Community Bodies
Rye Conservation Society thinks that affordable housing is required but concentrated around large conurbations where employment is available. English Village Projects agree that housing and service provision is important. Rother Environmental Group notes the discrepancy between supply and demand of housing. They agree there is an urgent need for smaller, rented, low cost, and sheltered dwellings. They also want a lowering of affordable housing threshold, mandatory to developments. The Core Strategy should promote higher density housing within development boundary. Rother Voluntary Action wants the focus of Core Strategy to on building a community infrastructure. Housing is only one issue jobs and skills needed for a community. They also suggest that that Theme 1 could be redefined to include physical infrastructure to support community development. Natural England want green infrastructure within housing and to see housing design reduce impacts on global as well as local environment.
The Hastings and Rother Primary Care Trust want affordable two bed housing to be prioritised due to aging population. When rural development is considered it must have easy access to public transport. Sussex Police recognise Rother’s excellent record of liaising with police. Suggesting that document would be improved by stating “The authority supports the policy scheme ‘Secured by design’ Planning applications will be expected to demonstrate how crime prevention has been considered and how the principles detailed in Safer Places have been adhered to”

Businesses
Rastrum would like there to be generous employment policy provision. Rother Homes recognise the need for affordable housing particularly in rural areas. It is in the rural areas where the Parish Council needs to convince residents of the need for affordable housing. Local letting policies can be useful in this respect.

Individuals
Individuals agree with mixed developments to meet local needs. However they suggest that they be placed close to public transport to reduce need for car.

**How responses have been addressed in the Strategy Directions Document**

The Communities section of the Strategy Directions document addresses the diverse needs of different sections of the community, and specifically those of older people (particularly in relation to housing) and young people. The approach to accommodation for Gypsies and Travellers, following an assessment and SEERA’s proposals, is also addressed.

Need for affordable housing addressed (see also question 3 responses) with detailed consideration of options, against a background of a relatively high house prices: earnings ratio. Means of increasing supply, as well as indicating approximate tenure split, are proposed. Viability will remain a key test.

Overall numbers of market housing will be addressed in Site Allocations Development Plan Document and potential sites will be highlighted in forthcoming Strategic Housing Land Availability Assessment, but Policy document aims to meet South East Plan housing requirements. Consideration is given to options to ensure sufficient smaller dwellings, for the young and older people.

To assist the provision of smaller housing the strategy direction proposes 40% threshold of 1&2 bed housing in rural areas.

Range of measures proposed to increase affordable housing namely: lower thresholds 15 to 10 in Rye and Battle, 5 to 3 in rural areas, proposals to allocate solely or predominantly for affordable housing, exception sites, prioritising affordable housing ahead of market housing and possible increase to 50% threshold in rural areas.

Needs of rural areas have been considered in detail in the background document the ‘Rural Settlement Study’ alongside with development potential of villages within the district. Findings are carried through to the Strategy Directions.
Infrastructure requirements and implementation arrangements are included in each section of the document.

A detailed Monitoring Framework is also set out.

Community infrastructure seen as key to creating ‘healthy’ and sustainable communities. Known requirements are identified for each town. For rural areas, they are set out (in broad terms) in the relevant chapter and in more detail in the Rural Settlements Study. It is still recognised that this will need to be elaborated upon through the current consultation and as specific sites are defined.

Theme 2: PROSPERITY FOR ALL

Question 5
What are the most effective and appropriate means of increasing the income available to local people, including via a range of career and learning opportunities, to support improvements in people’s standard of living?

In considering this, you are invited to comment specifically on:

What are the main means of ensuring prosperity?
What are the barriers to business growth?
What unmet needs are there for business land and premises?
Should the strategy look to reduce out-commuting?
What are most appropriate ways of promoting sustainable tourism?
How should land-based industries and others with direct links to maintaining local distinctiveness be encouraged?
In what way can the working environment support part-time working?
What are the needs of the educational sector in helping to continue to improve education and skill levels?

Responses to this Question: total number 22

Kember Loudon Williams Ltd (Mr Roger Nightingale) [4925]
Tourism South East ( Mr. Paul Jefferies) [4946]
Learning and Skills Council Sussex (Mr. Paul Stoggles) [4946]
Crowhurst Parish Council (Mrs. Pat Buckle) [4954]
Etchingham Parish Council (Mrs. S. Cobain) [4954]
Main Points and Common Themes

The majority of responses from this section were from development interests, environment groups and community bodies, local authorities and government organisations. There was a lack of responses from businesses and individuals. The main comments under this section concerned employment opportunities, transport infrastructure, tourism and rural enterprise. The main issues raised were:

Employment sites are needed to promote long term sustainability
All types of employment (service, tourism, agriculture, industrial) should be encouraged
Rural enterprise / Rural diversification should be encouraged
Tourism should be fully integrated into LDF- own section may be required
Sustainable Tourism is a good idea
Further education promoted and increased education infrastructure
Better transport infrastructure. Road and rail best way to promote economic prosperity
Build on the successful farmers markets, cutting food miles

Local Authorities and Government Organisations

County Council
The District Council can support the educational sector in two ways: supporting the necessary infrastructure at existing and new education sites and as a partner in terms of linkages with local communities and local businesses.

Parish Councils
Crowhurst Parish Council thinks the solution to this question is the reduction of isolation, following Brighton’s example of faster road and rail links. Etchingham Parish Council would like to see sustainable tourism, improved public transport to tourism hubs and better walking and cycling networks. Locally produced food to counter the availability of supermarket goods and that local education provision is essential for sustainable and supportive community networks. Rye Town Council also wants to see improved transport infrastructure as this will facilitate business growth and thereby individual prosperity.

Development Interests

Kember Loudon Williams Ltd would like Rother to regenerate and attract inward business investment and reduce out-migration. Croudace Strategic Limited wants the Core Strategy to have a policy that states that wherever possible existing employment sites should retained as employment sites. This is due to the high demand and prices that can be commanded for residential sites in urban locations. Employment sites are needed to promote long-term sustainability.

Strutt & Parker welcome the suggestion that further encouragement will be given to rural enterprise. They see the countryside as part of the future and it to be characterised by rural enterprise and other activities that rely on a closer relationship with the land.

PREM Limited would like the focus to be on economic regeneration and employment on the Sussex Coast area. They support mixed-use schemes, which can help achieve viable commercial developments and to encourage small business and ‘live-work’ units.

Environment Groups and Community Bodies

Rye Conservation Society want tourism to reflect the character of the place, adapting to the environment in certain areas and where appropriate the environment can be adapted to accommodate tourism. They see that improved public transport would improve out-commuting but also point out that most Bexhill residents don’t see commuting to Hastings as out-commuting.

Bexhill and District Gardens & Allotment Society would like to see the expansion of the successful local farmers markets, a more sustainable provision of goods. The National Trust wants policies that promote sustainable tourism and an upgrade of tourist attraction and visitor facilities where appropriate. Also rural diversification should be encouraged. The Forestry Commission believe that the stimulation of the market for wood fuel and fire wood would help secure jobs in the rural economy, and ensure sustainable woodland management. This would be helped by a percent requirement for renewable energy in new building and help to refurbish existing building. Natural England recognises the attempts to stimulate economic opportunities. Within farming securing producers with local outlets reduces food miles and encourages viability of less productive land.

Learning and Skills Council Sussex quote that the new college at Hastings will be a further education college not a sixth form college as stated in Issues and Options.
document. They would like to see suitable efficient and modern adaptable business premises which will allow Rother to grow. An increase in part-time employment is implied however, without active policies for full employment the average income would be fall and should be an issue for debate in any assessment of tourism trends. They also indicate that employment in childcare industry should be explored and believe that businesses trading outside the district will enhance economic prosperity. The Issues and Options document needs to confirm a positive relationship between the Council’s policies and business support services, which is principally delivered through 1066 Enterprise. The LSC are working to increase number of those entering higher education which is providing education based regeneration sought in Regional Economic Strategy.

**Businesses**

Rastrum would like there to be generous employment policy provision. Rother Homes want to encourage home working by providing space in new dwellings. This should reduce car usage. Rastrum Ltd themselves want to expand their operation. They think it is crucial that Rother encourages a wide range of employment opportunities so those who do not want to work in the service, tourism or agriculture can stay and contribute to the areas growth. They would like to see Rye Harbour to become a focus of regional growth and employment, in accordance with Rye’s historic status as a successful port.

Tourism South East wants tourism to be integrated fully into the LDF given that it’s of economic and social importance to Rother, it should have its own section. They also have produced their own guidance concerning tourism for local authorities in preparation of the LDF. Concerning demand for hotel accommodation they have undertaken work with local authorities to ensure LDF policies take account of local circumstances and market demand. They have also produced guidance on the issue of accommodation retention in response to increasing pressures for hotels to convert to residential.

Rother Voluntary Action sees skills, land, premises and modern communication infrastructure as crucial. Public sector can assist prosperity by creating an enabling environment to allow public sector to develop faster. Encouraging private sector growth can promote sustainable tourism and land based industries.
Individuals

Individuals would like to see commuter links supported and new homes located in places that allow people to travel to local jobs. Also they do not wish the local authority to restrict out commuting.

**How responses have been addressed in the Strategy Directions Document**

The Economy section in the Strategy Directions document highlights objectives that seek to reflect local economic priorities.

The aim of the chapter is to ‘Secure sustainable economic growth for existing and future residents and provide greater prosperity for all’. The need for a holistic approach, including educational attainment, is highlighted.

The preferred strategy for sustainable economic development includes the support of a broad range of employment typologies.

The Rural Areas chapter has objectives which seek to support agriculture and foster other land based industries, support local agricultural enterprise and diversity such as farmers markets and farm shops and the effective and appropriate use of redundant agricultural buildings, especially for employment generating uses, including tourism.

Tourism is drawn out as a specific sector, with its own preferred strategy direction.

Aim of Transport and Accessibility chapter is to provide a higher level of access to jobs and services for all ages in both urban and rural areas, and improve connectivity with the rest of the region; hence, it dovetails with the Economy aim.

There is full recognition of both the contribution of existing employment sites and premises and the need for new, modern accommodation.

The area’s potential for ‘enviro-industries’ is noted, and encouraged.

It is noted that the business community has not been very engaged in the process to date and this will be addressed in this consultation.

---

**Theme 3: Communications and Accessibility**

**Section 7**
Question 6

How do you think poor connectivity with the wider region and London, localised congestion and high reliance on car use should be addressed?

In considering this, you are invited to comment specifically on:

How critical is improved strategic transport infrastructure?

Which are the most important transport links serving the district?

What are the main local traffic problems?

What are the main unmet demands for improved bus services?

What day-to-day local shops and services is it most important to have ready access to?

What are the main issues concerning car parking provision?

What impact will greater use of IT have on the need for small business units?

Responses to this Question : total number 33

Howard Hutton & Associates (Mr. Roger Hutton) [4927]
High Weald AONB Unit (Mr. Andrew Shaw) [4944]
Crowhurst Parish Council (Mrs. Pat Buckle) [4950]
Beckley Parish Council (Mrs. H. Scott) [4954]
Etchingham Parish Council (Mrs. S. Cobain) [4954]
Rye Town Council (Mr. Richard Farhall) [4956]
Hastings Borough Council (Mr. Roy Mawford )[4960]
Rye Conservation Society (Mr. K.R.F. Bird) [4962]
Croudace Strategic Limited [4967]
Rastrum Ltd. [4973]
Mr. A. Miskin [4975]
Mr. John Royle [4987]
English Village Projects [5002]
Mr. B.R. Streat [5005]
Highways Agency (Mrs. Margaret Pratt) [5007]
Bexhill and District Garden and Allotments Society (Mr. C.R. Bryen) [5009]
PREM (Rooster) Limited [5011]
East Sussex County Council (Mr. Nick Claxton) [5015]
Home Builders Federation (Mr. Bart Wren) [5017]
East Sussex Transport 2000 (Mr. Derrick Coffee) [5024]
Mr. Edward Echlin [5029]
Rother Homes (Mr. Tony Streeter) [5034]
Mr. Christopher Strangeways [5040]
Rother Environmental Group (Mr. Dominic Manner) [5045]
The National Trust (Ms. Jane Arnott) [5052]
BALI (Mr. Nick Hollington) [5054]
Strutt & Parker (Mr. Craig Noel) [5058]
Ms. Elizabeth Goldsworthy [5064]
Mr. David Verker [5065]
Rother Voluntary Action (Mr. M.J Fisher) [5067]
Ms. Joan Goldsworthy [5080]
Rother Valley Railway (Mr. S.G.N. Bennett) [5084]
Natural England (Mr. Kristoffer Hewitt) [5088]

Main Points and Common Themes

The responses came from a broad sector of recipients, which included local authorities and government organisations, environmental groups and community bodies, large and small local businesses, development interests and individuals. The clear consensus is that transport infrastructure must be improved.

The main points raised were:

- The need for improved road and rail links. Reliable and frequent train services. Better roads for East Sussex will make it more accessible and attractive to outward investment.
- More public transport. Bus routes are especially important in rural areas.
- Sustainable transport.
- Reduction in carbon dioxide levels is required.
- The correct amount of car parking must be provided.
- Home working units are favourable.
- Correct location of affordable housing is to be near existing public transport.

Councils and Government Organisations

County Council and Hastings Borough Council

East Sussex County Council view is that poor transport infrastructure reinforces the Sussex Coast peripheral nature. The link road is essential for regeneration and growth. The South East Plan wants to reduce out-commuting and so much depends on the delivery of key transport within and beyond the district. They point out that the document does not explain the role of the County Council as a Highways Authority in securing developer contributions towards a sustainable transport improvements and its current joint work with the RDC on an accessibility audit for the area.

Hastings Borough Council very much support the improvements to the A21/Queenway and Bexhill/ Hastings Link Road.

Town and Parish Council

Rye Town Council thinks that bus and train services should be better integrated. They also believe the congestion on the A259 at Rye could be relieved by a bypass.

Crowhurst Parish Councils believes that commuting by car is a fact and it should be facilitated. They see the important transport links as the A21, A22 and the rail links between London and Ashford via Crowhurst. They don’t think the link road will relieve congestion and that there should be cheap/free bus services to the villages.
Beckley Parish Council would like to see a 30m.p.h speed limit on the Main Street and a reduction of the 60 m.p.h speed limit on Whitbread Lane. Parking is of another concern with people parking to near the road junctions of Hobbs Lane and Whitbread Lane. With more houses have been built where there is a shortage of parking, new developments should have ample rather than sufficient parking.

Etchingham Parish Council believes Rother to have good rail connections but weak roads. The bus services do not cater for return travel to large centres from villages for work, and evening travel for young people. Local services are closing and better local services can limit daily travel. Villages are blighted by speeding traffic and lorries. Highways do not always support parish funded traffic calming schemes. They see increasing level of car ownership inevitable because of inflexible expensive public transport. However, minimum car parking provision should be made with new housing. A clear parking policy for how parking revenue is used and needed is required. Improved IT will mean more home working and less need to travel.

Other
The Highways Agency is against large developments occurring in Bexhill before the completion of the link road. Providing the correct amount of parking is essential to prevent overspill effects on local network and too much parking would reduce the amount of people using sustainable transport modes. Every opportunity should be used to encourage the provision of sustainable transport modes.

Development Interests

Howard Hutton & Associates are promoting the concept of ‘deficit planning’ which asks the question "Where are the problems in the District that additional development might resolve?" They feel the idea could be used more widely to secure infrastructure improvements. Croudace Strategic Limited thinks the Core Strategy should reflect on PPG13 and PPS3 setting out the need for new developments to be located in areas well served by public transport and other sustainable modes of transport. New developments can improve local transport and infrastructure. Strategic transport should be improved however this requires commitment from central and regional government. In the short term the District should capitalise on existing transport infrastructure and position new developments in well served areas.

PREM (Rooster) Limited believe that the Bexhill Hastings link road is vital to support the proposed residential and business in North Bexhill. They believe that this development is needed so the district housing numbers can be met. No action would compound problems of low build rates and lack of affordable housing. Strutt and Parker think that it should be acknowledged that there is little practical alternative to the car in rural sectors. They are also pleased to see the encouragement of home working and rural enterprise.

The Home Builders Federation think infrastructure is a necessary component, essential to support housing growth. Strategic housing developments between Rother and Hastings could be a catalyst of infrastructure improvements.

Environmental Groups and Community Bodies
High Weald AONB Unit would like to see home working, flexible working habits and live work units as a significant element of working premises and options supporting the changing pattern of employment. They also want to encourage local jobs for local people. Rye Conservation Society view is the poor transport links as a major constraint on growth. The LDF should seek to promote to upgrade the bus and rail services. English Village Projects want the A21 to be improved preferably to dual carriageway. They also think it is important to monitor and control the potential impact of improved accessibility to London upon remoteness of countryside and the sea.

The Bexhill and District Allotment Society believe that there should be greater provision for bus and train services and increased concessions for the elderly to improve their mobility. Rother Environmental Group thinks that the document is flawed by over-reliance on link road which is also contrary to the sustainable development desire. They also note that there is little mention of walking and cycling and see to much emphasis on encouraging reliable and frequent public transport.

The National Trust think that improved connections to London and reduction in car use can be achieved by improved rail. They also want to see improvements that facilitate walking and cycling as a way of reducing localised congestion. BALI are not in favour of the link road as it would simply transfer congestion. They feel it needs to be subject to a comprehensive environmental impact assessment. They feel improved public transport would be a better solution. Rother Valley Railway would like to see the Robertsbridge/ Bodiam link to be considered as a potential transport scheme. Natural England informs that schemes such as ‘tourism without traffic’ have already taken place in Sussex.

East Sussex Transport 2000 acknowledges transport is a major contributor to greenhouse gas emissions, that local trips are potentially transferable to more sustainable modes. They see an opportunity for bus and rail improvements however, the link road and A21 schemes are expensive and environmentally damaging and the link road need is unproven. They want more sociable 20 m.p.h zones and that more walking and cycling will reduce accidents. Rother Voluntary Action believes that improving Rother’s transport and communication is imperative. Speed management through settlements is essential and a better bus service is vital. They suggest a park and ride and that due to increasing car usage investment in car parking makes sense.

Businesses

Rother Homes view is that those occupiers affordable housing in small rural villages are likely to have a lower than average income. Therefore they must be close to facilities and services or a rural bus service needs to be provided. Rastrum Ltd believes there is no significant problem with congestion, although the transport networks would have to be improved to attract outside investment. The LDF must address carbon dioxide omissions and increase use of Rye Harbour.
Individuals

Some Individuals are in favour of the Hastings/ Bexhill link road the Baldslow Junction and improvements to A259 from Bexhill to Rye. Other think the document is heavily reliant on the new road and would prefer long term sustainable transport policies. They recognise the importance of improved transport links which would encourage regeneration. One individual was disappointed at the no thought has been given to sea transport. Also the issue of new stations at Glyne Gap and Wilting are required. Lack of parking was also raised.

<table>
<thead>
<tr>
<th>How responses have been addressed in the Strategy Directions Document</th>
</tr>
</thead>
<tbody>
<tr>
<td>The responses highlighted that transport infrastructure must be improved and key objectives have evolved to support such a change: The aim of the Transport and Accessibility chapter is to provide a higher level of access to jobs and services for all ages in both urban and rural areas, and improve connectivity with the rest of the region.</td>
</tr>
<tr>
<td>Public transport is supported by strategy which proposes to give priority to improving strategic transport infrastructure as well as encouraging more sustainable travel patterns. The role of buses in rural areas is highlighted.</td>
</tr>
<tr>
<td>An objective has been included in the Environment section ‘to minimise carbon emissions, including through greater use of renewable energies’ as well the objective in the Transport section to increase the potential for more sustainable travel patterns.</td>
</tr>
<tr>
<td>Sufficient car parking will be sought as well as the efficient use of parking spaces with shared use of land to maximise the potential of the land.</td>
</tr>
<tr>
<td>The key schemes for the Link Road and Baldslow Improvement are prioritised, acknowledging that they will be subject to environmental impact assessment. The potential for a rail link from Robertsbridge to Bodiam is safeguarded, while sea transport is addressed in the Rye section.</td>
</tr>
</tbody>
</table>

THEME 4: QUALITY IN THE BUILT AND NATURAL ENVIRONMENT

Question 7

How should we meet the demands for housing, employment and associated infrastructure in ways that conserve and enhance the high quality natural built and historic environments, and at the same time respond to increasing climate change and energy conservation imperatives?

In considering this, you are invited to comment specifically on:

What aspects of the environment contribute most of local quality of life?

In what respects does environmental quality need improving?
**What are the most appropriate ways to manage flood risk?**

*How important is it to require more sustainable buildings (e.g. by ensuring the developments incorporate renewable energy and energy/water efficiency features)*

**What forms of renewable energy are most appropriate to Rother?**

*How important is reinforcing the districts architectural heritage when considering new building design?*

**What scope is there for modern innovative designs in new buildings?**

**Responses to this Question:** total number 30

Wm. Morrison Supermarket Plc [4920]
Kember Loudon Williams Ltd (Mr Roger Nightingale) [4925]
Hastings and Rother Primary Care Trust (Mr Richard Watson) [4938]
High Weald AONB Unit (Mr Andrew Shaw) [4944]
Etchingham Parish Council (Mrs. S. Cobain) [4954]
Rye Town Council (Mr. Richard Farhall) [4956]
Rye Conservation Society (Mr. K.R.F Bird) [4962]
Croudace Strategic Limited [4967]
Fairview New Homes Ltd. [4970]
Rastrum Ltd. [4973]
Mr. A. Miskin [4975]
Sussex Gardens Trust (Ms. S. Penny)
UK land Investment Group [4994]
English Village Projects [5002]
Mr. B.R. Streat [5005]
Highways Agency (Mrs. Margaret Pratt) [5007]
Bexhill and District Gardens & Allotments Society (Mr. C.R. Bryen) [5009]
Rother Environmental Group (Mr. Dominic Manning) [5045]
The National Trust (Ms. Jane Arnott) [5052]
BALI (Mr. Nick Hollington) [5054]
Forestry Commission (Ms. Jane Hull) [5056]
Persimmon Homes (South East Limited)
Wealden District Council (Mr. Alexei Zammit) [5063]
Ms. Elizabeth Goldworthy [5064]
Mr. David Vereker [5065]
Rother Voluntary Action (Mr. M.J Fisher) [5067]
Southern Water (Ms. Susan Solbra) [5070]
National Farmers’ Union (South East Region) (Mr. John Archer) [5072]
Garden History Society (Mr. John Clark) [5074]
Natural England (Mr. Kristoffer Hewitt)

**Main Points and Common Themes**

We received a large number of responses under this section from a broad sector of groups such as Local authorities and government organisations, development interests, businesses, environmental groups and community bodies and individuals.
The largest number of responses came from the environmental groups and community bodies. The main issues brought up under this section are:

New development should aim to fit in with the surrounding and be sympathetic to the heritage
Renewable energy policy is generally supported and woodfuel/crops should be promoted
BREEAM methods be adopted to access the environmental performance
Concerning flood management, barriers may not be the ideal solution, flood storage and increased woodland have been suggested
Sustainable building is looked upon favourably
Need to reduce carbon dioxide omissions

Local Authorities and Government Organisations

Parish Councils
Etchingham Parish Council believes that good air and environment quality would result a better quality of life. Sustainable building and renewable energy are essential components. They also believe architectural heritage is be vital to the district and careful design can provide sustainable buildings. Rye Town Council thinks that green belts need to be maintained to protect the natural and historic environments. Flood plains should be preserved to provide protection for the inhabitants. They feel Rye and Battle are being ruined by traffic volume and weight.

County and District Councils
East Sussex County Council wants high environmental performance in line with RPH9 policy INF4. The County has also published a SPD on Construction and Demolition of Waste. Wealden District Council thinks that the renewable energy policies should be devised in the view of protecting this high quality and unique landscape.

Other
Hastings and Rother Primary Care Trust believe that new developments which do not use renewable resources, should be discouraged. Homes should be protected from air pollution and traffic. Every opportunity should be given to communities to walk and cycle. The Highways Agency view concerning air quality is the need to consider whether a development will cause a compliance problem from 2010 or make existing forecast compliance worse.

The Government Office for the South East questions whether any thought has been given to including specific policy on renewable energy to take advantage of potential opportunities for managing the extensive woodland for generating renewable energy.

Development Interests
Kember Loudon Williams Ltd comments regard flood risk. Building barriers is not the ideal solution as demonstrated in Rye and alternative methods of flood control should be encouraged. Croudace Strategic Limited thinks that the Core Strategy should include a policy which enhances and conserves the natural, built and historic environment. New developments should be encouraged to include energy conversion /generation methods beyond building regulation requirements.
Fairview Homes Ltd thinks that energy and sustainable issues should not stifle developers as specific policy requirements can make schemes unviable. The viability of delivering schemes should be the priority. They would like to see a policy concerning ensuring the highest design and to clarify the definition of ‘High Standard of Design’. Land Investments Group thinks that the Core Strategy provides a robust strategic approach.

Home Builders Federation object to the application for Lifetime homes. They believe developers should have the opportunity to meet a 10% on-site renewable policy, taking account of available technologies and site constraints. Developers could make proportionate contributions to community based energy schemes. They would like to see a universal policy base between local authorities which will encourage the market to deliver innovation. Persimmon Homes want new development to fit in with local environment.

Environmental Groups and Community Bodies
High Weald AONB Unit supports the reference to the AONB. However, they would like to see reference to the High Weald AONB Management Plan 2004. Added to this they would like to see specific design guidance that would reflect the character of the High Weald AONB. The promotion of woodfuel should be seen as a priority. Rye Conservation Society view is that the natural and built environments are separate issues which require separate analysis and separate policy formulation. They think that new housing should be placed in and around conurbations to provide cost effectiveness management schemes. The Core Strategy should contain commitments to improving the architectural landscape.

Bexhill and District Gardens & Allotments concerns are about increased building versus better quality of life. Building on AONB, destroying the natural environments will reduce quality of life. There is concern that carbon dioxide levels should be reduced.

Sussex Gardens believes that cultural heritage contributes to overall character of the area and is a tourist draw. New development should respect this, as it enhances quality of life and is an important resource the local economy. The Core Strategy needs to mention the European Landscape Convention as it becomes law in 2007. They believe that policies should:

Support the retention of listed structures and registered landscapes, control demolition, extension, alteration and change of use.
Ensure that proposals don’t harm the setting, curtilage and historic context of listed structures or landscapes.
Support the recognition of historic landscapes of the district as importance.
Require the historic and architectural evaluation of an historic structure or landscape to ensure the planning decisions are based on proper understanding
Secure the retention of distinctive local features
Ensure farm buildings historic interest and landscape and setting character are retained in change of use or conversion proposals.
English Village Projects view concerning the built environment is that there has been undue complacency allowing inappropriate developments. They believe that many of these developments will need to be replaced. RSPB recommend the inclusion of the following wording:

Development likely to adversely affect SSSIs which cannot be avoided or minimised will not be permitted, unless the benefits of development at this site clearly outweigh the impacts on this site and the national SSSI network. The Council will take all reasonable opportunities to conserve or enhance the special interests of SSSIs through the planning system.

Rother Environmental Group think that Theme 4: preserving existing built environment is not sustainable. The climate change methods are vague and unambitious. There is no mention of BREEAM. They feel that all new development should be given a rating and that building which is out of keeping should be supported in order to achieve a zero carbon emission.

The National Trust supports high density building and wants further emphasis on the protection and enhancement of the heritage. They support the renewable energy principle but not wind farms. BALI generally liked the section however would like to see waste management and waste disposal tackled head on here and not just in Section 9. The Forestry Commission suggest that text should be added to the map of the ancient woodland and that the protection should be to same standard as SSSIs. They think sustainable building is key in reducing the carbon footprint and woodfuel is important renewable energy.

Garden History Society would prefer policy on historic parks and gardens to be in the Core Strategy with more detailed policy in Planning Control and Policies DPD. Policy presumption should be against enabling development to accord with English Heritage Policy Statement ‘Enabling development and the Conservation of Historic Assets.’

Natural England thinks that farming can provide food for the local area and also contribute to the character and appearance of the countryside. Forestry contributes to the countryside and wood can be used as a fuel especially at local scales. They agree with the inclusion of the Shoreline Management Plan and support the need to ensure specific sites are protected for biodiversity. Concerning managing flood risk they think that flood storage in floodplains and in certain areas increased wooded areas can reduce the risk to floodplains. For urban areas sustainable drainage systems work well. Natural England sees sustainable building as a way of reducing the carbon footprint. They suggest building targets should meet the ‘very good’ standard of eco-homes/BREEAM. They would like to see Rother with at least 10% renewable energy from on-site generation. It is important they architectural heritage is preserved and the use of local materials.

Rother Voluntary Action comments that the “natural environment” has to have an economic rationale or be abandoned. It appears that the strategy has glossed over investment in water conversation technologies, power generation and the creation of environmentally friendly transport systems. They recommend replacing theme 4 with Environmental Sustainability.
The National Framers Union thinks it is crucial to retain agricultural production capacity in regions which are able. They feel it is important not to prevent development into innovative markets with inflexible policies. They support renewable energy projects and have the ability to provide fuel crops.

Businesses
Wm. Morrison Supermarkets Plc believes that policies on energy efficiency and sustainable construction should reflect PPS22. Rastrum Ltd would like to see Rye Harbour extended for a more sustainable way of moving goods around Europe.

Rother Homes explain that the main physical requirements of houses are comfort, security and economy on fuel use. They want new development needs to ‘fit in’ with existing environments and for affordable housing to help sustain community life and need to access facilities. Southern Water wishes that all water sources be protected. Flood risk should be managed and development must incorporate surface water drainage. They suggest the BREEAM methods be adopted to access the environmental performance

Individuals
The individuals comment: that although it is important to protect the environment it is important balance this against human need. However, protecting the environment is a key concern.

For energy they suggest that waste could be turned to energy, the river tide could be harnessed and the sea could be used a source of renewable power.
How responses have been addressed in the Strategy Directions Document

The Strategy Directions document sets out the objectives for the stewardship of the environment:

Policies will require that new development contributes positively to the character of the site and its surroundings. In addition locally distinctive forms, features, materials and historic context will need to be considered.

Using energy crops for a fuel source is a developing technology, but the Sustainable Resource Management section in the Environment chapter addresses renewable energy and aims to set locally specific and strategic site requirements for on site renewable energy requirements. Further work is proposed to assess the potential.

Environmental performance is proposed by the implementing the Government-led mandatory level in the Code for Sustainable Homes, with consideration also being given to the option for higher standards.

Strategic Flood Risk Assessment has been undertaken to clarify flood risk. The document sets out objectives to reduce flood risk and includes making use of Sustainable Drainage Systems. Developing multifunctional greenspace as proposed by the Biodiversity Strategy can also help.

Carbon dioxide levels aim to be reduced via objective in the Environment section, including through greater use of renewable energies as well as supporting more sustainable travel patterns.

Water conservation is highlighted, as is safeguarding key resources.
THEME 5: INFRASTRUCTURE AND COMMUNITY FACILITIES

Question 8

How should we ensure that the necessary physical infrastructure and facilities are available to support sustainable communities and achieve more sustainable development including:

Ensuring adequate water supply
Planning for surface water and foul drainage
Managing waste
Providing high standards of education and healthcare
Providing for local shopping needs
Providing sufficient and effective recreation and other community facilities

In considering this, you are invited to comment specifically on:

Are recreation facilities lacking in quantity or quality in your community?
Do education facilities need improving in your community?
How can healthcare be improved upon in your community?
Are the community halls/village halls adequate in your area?
What other community facility do you believe is lacking in your village, town or neighbourhood?
How do you rate your nearest town centre in meeting your main shopping needs?
How do you rate your nearest local neighbourhood or village centre in meeting your day-to-day shopping needs?

Responses to this Question: total number 33

Howard Hutton & Associates [4927]
Wm./ Morrison Supermarkets Plc [4920]
Hastings and Rother Primary Care Trust (Mr. Richard Watson [4938]
Learning and Skills Council Council (Mr. Paul Stoggles) [4948]
Crowhurst Parish Council (Mrs. Pat Buckle) [4950]
Beckley Parish Council (Mrs. H. Scott) [4954]
Etchingham Parish Council (Mrs. S. Cobain) [4954]
Rye Town Council (Mr. Richard Farhall) [4956]
Hastings Borough Council (Mr. Roy Mawford)[ 4960]
Rye Conservation Society ( Mr. K.R.F Bird) [4962]
Croudace Strategic Limited [4967]
Rastrum Ltd [4973]
Hastings and Rother PCT (Mr. Simon Lawrence) [4989]
Rye allotments Association (Mr. E.R Godwin) [4996]
Highways Agency (Mrs. Margaret Pratt) [ 5007]
Bexhill and District Garden and Allotments Society (Mr. C.R. Bryen) [5009]
PREM (Rooster) Limited (Mr. Richard Thomas) [5011]
East Sussex County Council (Mr. Nick Claxon) [5015]
Sainsbury Supermarket [5026]
Rother Homes (Mr. Tony Streeter) [5034]
Musgrave Budgens Londis [5041]
Rother Environmental Group (Mr. Dominic Manning) [5045]
Ms. Pat Field [5046]
Land Securities plc [5047]
BALI (Mr. Nick Hollington) [5054]
Forestry Commission (Ms. Jane Hull) [5056]
Mr. David Vereker [5065]
Rother Voluntary Action (Mr. M.J Fisher) [5067]
Southern Water (Ms. Susan Solbra) [5070]
Environment Agency (Ms. Claerwyn Hughes) [5082]
Sports England, South East Region (Mr. Mick Anson) [5086]
Natural England (Mr. Kristoffer Hewitt)

Main Points and Common Themes

The responses came from a broad sector of recipients which included local authorities and government organisations, environmental groups and community bodies, large and small local businesses, development interests and individuals.

The main issues raised were:

Retail development should be sited in the town / urban centres
Green infrastructure should be developed
Infrastructure is critical to social sustainability
Waste and recycling issue not dealt with comprehensively enough
Need regard to water supply

Local Authorities and Government Organisations

County and Borough Councils
East Sussex County Council comments that Themes 5 and 3 make no reference to the infrastructure policies in South East Plan and Structure Plan. Infrastructure requirements of development options can only be realistically determined at the later stage of the LDF. Hastings Borough Council supports the document and that new development should only be permitted where services are available.

Town and Parish Councils
Rye Town Council thinks that development proposals should not be considered without consultation with utility providers, education authorities and healthcare providers. Crowhurst Parish Council thinks their existing village infrastructure is poor and would like a viable shop. Beckley Parish Council seek more help in its quest for better infrastructure and services. The larger villages of Peasmarsh and Northiam mean that local services such as PO, pubs and newsagents are not viable. Etchingham Parish Council raise issues specific to themselves. These include that the local plan allocation will make the village a more sustainable community. They hope for traffic calming, a pub and public conveniences. Also they would like a site for a recycling project. The village supports its community shop and villagers travel to surrounding small town for other needs.

Other

The Highways Agency think development should be carefully sited and community facilities supported reducing the need to travel. Hastings and Rother Primary Care
Trust feel that infrastructure and community facilities must promote healthy lifestyles. They also feel that the section should take into account the capacity of GP surgeries in Rother and the configuration of the hospitals acute services within East Sussex and neighbouring counties. For the large scale developments currently under review the PCT feels a health impact assessment is undertaken to measure impact of the developments on the health and well being of the local population.

**Development Interests**

Howard Hutton & Associates think development allocations should include missing infrastructure therefore ‘win win’ situation would prevail. Croudace see they have a part to play in providing infrastructure however, see it as Regional and Central Government’s job to provide strategic infrastructure. PREM (Rooster) Limited wishes planning obligations to be tested against the guidelines set out in Circular 05/2005. Land Securities plc support the key aim of providing for local shopping need and providing sufficient and effective recreation and other community facilities. Improving retail would stop leakage to bigger town centres elsewhere and recreation facilities can be provided if appropriate locations are identified.

**Environmental Groups and Community Bodies**

Rye Conservation Society supports the strengthening of town centres and the retaining of healthcare services at the Conquest. Rye Allotments Association have no objection to the aims, however note that allotments are not mentioned. Allotments are part of lives of the young and old and are beneficial to the environment. Their boundaries should be respected. Bexhill and District Gardens & Allotments Society think that developments should include open spaces. The current house building proposals are excessive and unsustainable as there is not enough infrastructure. They believe that allotment provision is of utmost importance.

Rother Environmental Group thinks that Theme 5 does not give enough weight to promoting grey water recycling systems and strategies to reduce water consumption. They note that the document makes little mention of facilitating reducing, re-using and recycling of both household and commercial waste. A site must be identified in Eastern Rother for household waste and recycling. BALI question why the Core Strategy doesn’t recognise the serious issue raised by waste sites and the subject of waste is not sufficiently dealt with.

The Forestry Commission considers that is important to ensure appropriate access to the greenspace for those who live in rural areas, as much of the countryside is inaccessible. Natural England like the Forestry Commission stress that it is important for those in the countryside to access green space as much is inaccessible. They suggest that Rother consider using the English Nature Access to Natural Greenspace Standard as part of the audit.

Rother Voluntary Action thinks that the strategy is not coherent and the term ‘community facilities’ is out of date. They suggest that physical infrastructure could be revamped under a social sustainability theme.

Southern Water believes there must be an adequate water supply. The Core Strategy should support provision of water and waste water infrastructure. Land should be allocated to facilitate delivery of regional water schemes. Secure
appropriate developers contributions and co-ordinate development with the provision of necessary infrastructure. The Environment Agency is pleased with the approach.

Sport England, South East Region believe that an up-to-date local needs assessment for open space, sport and recreation as required by PPG17 should be carried out. Sports England provides tools to assist in the assessments. The Learning and Skills Council think paragraph 9.8 Access to 16+ education locally has recently seen Rye lose its sixth form, while proposals for a sixth form college at Battle are not now being progressed. May encourage a negative reaction. A broader based statement would be of benefit.

**Businesses**
Wm. Morrison’s Supermarkets plc believes that the Core Strategy should in accordance to PPS6 should set out a clear retail hierarchy. With reference to paragraph 9.27 any requirements for developer contributions must be in line with Circular 05/2005. Rastrum Ltd believes by supporting the maintenance of the harbour so its condition stays suitable for commercial shipping. Sainsbury Support 9.10 that “Shopping should be focused within the main shopping areas of Bexhill, Battle and Rye Town Centres”

Rother Homes think all rural villages need better public transport links and that gas suppliers should be encouraged to extend gas supplies to all villages. Musgrave Budgen Londis support the focussing of retail development into the town centres. They believe there should be modest growth in retail floor space to town centres.

**How responses have been addressed in the Strategy Directions Document**

*The strategy recognises that the availability of the requisite infrastructure, or the prospect of it, is a critical consideration in determining the suitability for growth.*

*It is proposed guidance is prepared that will provide additional support in the provision of infrastructure and community facilities.*

*A Retail Study has been carried out and informs retail development to support vital and vibrant towns.*

*Infrastructure is also dealt with under the spatial chapters, with health/recreation and community facilities being dealt with under the Communities chapter.*


*As stated in response to Q3, the Strategy Directions document includes a heading on infrastructure in each section, which will be elaborated upon in the Core Strategy following consultation.*
Area Strategy Principles

Question 9

Are these (14 principles in Section 10 of the Issues and Options document) the most appropriate general principles for guiding the location of the development?

Responses to this Question: total number 25

Howard and Hutton & Associates (Mr Roger Hutton) [4927]
Aroncorp Ltd [4935]
Kember Loudon Williams Ltd (Mr. Roger Nightingale) [4925]
High Weald AONB Unit (Mr. Andrew Shaw) [4944]
Crowhurst Parish Council (Mrs. Pat Buckle) [4950]
Beckley Parish Council (Mrs. H. Scott) [4954]
Etchingham Parish Council (Mrs. S. Cobain) [4954]
Rye Town Council (Mr. Richard Farhall) [4956]
Rye Conservation Society (Mr. K.R.F Bird) [4962]
Croudace Strategic Limited [4967]
Mr. A Miskin [4975]
Mr. and Mrs. Appleby [4983]
English Village Projects [5002]
Highways Agency (Mrs. Margaret Pratt) [5007]
PREM (Rooster) Limited (Mr. Richard Thomas) [5011]
Home Builders Federation (Mr. Bart Wren) [5017]
Rother Homes (Mr. Tony Streeter) [5034]
Land Securities plc [5047]
Forestry Commission (Ms. Jane Hull) [5056]
Strutt & Parker (Mr. Craig Noel) [5058]
Persimmon Homes (South East Limited) [5059]
Mr. David Vereker [5065]
Rother Voluntary Action (Mr. M.J Fisher) [5067]
National Farmers Union (South East Region) (Mr. John Archer) [5072]
Natural England (Mr. Kristoffer Hewitt) [5088]

Main Point and Common Themes

The responses came from a broad sector of recipients including the Parish Councils, environmental groups, businesses, development interests, agencies and individuals. The main consensus was that most agreed with the principles and thought that the building of new housing should mainly be built on previously developed land however, it is recognised that some greenfield development was necessary.

The main issues raised under this section included:

Make best use of previously developed land
Sustainable transport modes must be promoted
Large development in AONB are not acceptable
Affordable houses must be integrated as a principle
Protect ancient woodland and farmland
Councils
Parish Council
Crowhurst Parish Council answer Yes but, have reservation concerning the link road, Queenway Office development and 800 homes at Upper Wilting which they see contradict (ix) “respecting the importance of the countryside” or (xii) protecting vulnerable countryside gaps between settlements”. Beckley Parish Council sees the protection of the AONB of paramount importance and the management plan to preserve and support the unique village qualities. Rye Town Council also answers Yes to the question.

Other
The Highways Agency is in favour of achieving accessibility through a greater choice of convenient transport methods. Therefore, in order to comply with PPS12 Test of Soundness 4 and 7, local level land use development strategies take the opportunity to reduce the need to travel by car.

Development Interests
Howard Hutton & Associates think general principles are in accordance with Government advice. Aroncorp Ltd think that the general principles should recognise the role of greenfield sites in securing a sufficient supply of residential accommodation and deliver the scale of affordable housing required for the district. Croudace Strategic Limited view is that the general principles are comprehensive enough. However, they consider that they should be summarised or reduced. They want more flexibility in the Core Strategy as some of the guiding principles will become redundant in the time frame of the strategy. PREM (Rooster) Limited support principles especially building on previously developed land.

Home Builders Federation would like the following objectives included: To enable delivery of housing that satisfy both need and market demand, to allow timely delivery of housing in step with sub-regional housing market and to provide a flexible and responsive supply of available land with site allocations to provide certainty for house builders. Land Securities support broad principles for location of development. For retailing they recognise that existing units do not provide a big enough and attractive environment for shopping. Existing out of town retail development should be considered for further retailing.

Strutt & Parker would like to see the following principle added. ‘in recognition of the importance of the rural sector in Rother, committing the council to support the proposals to achieve a healthy diverse and prosperous rural economy whilst protecting the best and unique features which characterise the rural environment of Rother’ Persimmon Homes believes paragraph (iv) ensuring a good level of accessibility to a range of services and jobs by public transport, recognising that opportunities are more limited in rural areas. Should be top priority.

Environmental Groups and Community Bodies
High Weald AONB Unit thinks that the High Weald AONB is not a suitable location for large scale housing allocations. However, there may be a potential for small scale development to meet local needs. It should be designed to promote local character. Rye Conservation Society thinks that the natural environment and built
environment are underplayed in Section 10. They note that there is no reference to historic towns and conservation areas. Also that water, energy conversation and waste recycling are not adequately featured in the Core Strategy.

The Forestry Commission would like to see all ancient woodland protected to the same standard as SSSI’s. Rother Voluntary Action thinks this section is an overlap of the themes. The National Farmer’s Union would like to see the agricultural land being protected when forming coastal policy.

**Businesses**

Rother Homes think that a point concerning affordable housing should be added to general principles. For example ‘Using Housing Needs statistics to identify and substantiate the need for affordable housing across the district and particularly in rural small settlements and small villages.’

**Individuals**

Individuals think that brownfield land and previously developed land should be priority however greenfield should be considered. They also support development with accessible public transport. And want the strategy to ensure flexible responsive housing land and there to be greater emphasis put on the sequential approach.

**How responses have been addressed in the Strategy Directions Document**

The principles are now embodied in the aims and objectives. General locational criteria are also presented. Priority is given to making best use of urban land and minimising loss of countryside. Objective within Transport and Accessibility chapter is to increase the potential to travel by more sustainable modes.

Government guidance in PPS 7: Sustainable Development in Rural Areas states that major developments should not take place in areas designated within the AONB. The Core Strategy will be in conformity with Government guidance. The overall distribution strategy does not promote, or allow, an unduly high level of development in the AONB.

The issue of affordable housing is a key objective in the preferred strategy for the Communities chapter.

Ancient woodland is now protected within the Environment chapter.

**How Much Development to Plan For?**

**Question 10**

*What are the respective merits of higher or lower levels of growth especially in the short and medium term?*

**Responses to this Question : total number 20**

Howard and Hutton & Associates (Mr Roger Hutton) [4927]
Aroncorp Ltd [4935]
Main points and Common Themes

We received a fairly low number of responses under this question but nevertheless they were from a broad sector of respondents. These were from local authorities and government organisations, development interests, environmental groups and community bodies, businesses and individuals.

The main issues raised under this section include:

Strategy to flexible to take higher levels of growth.
High growth scenario should be anticipated, however there is recognition that Rother is restricted mainly through the size of AONB
New development can be seen as a way to regenerate, although economy growth potential limited
Housing growth, job growth and infrastructure sold correlate

Local Authorities and Government Organisations

County Council
East Sussex County Council feel that higher development levels could bring more affordable housing however adverse effects would be caused by employment development which could mean out-commuting and elderly in-migration.

Parish and Town Councils
Rye Town Council think development levels should be guided by the need to preserve the identities of distinct communities. Etchingham Parish Council believes that because Rother won’t reach it housing targets they must set out the constraints of the area.
Other
Learning and Skills Council warn that if the population becomes younger consideration will need for student travel between the district and Hastings. Rother Voluntary Action thinks that high growth requires investment in infrastructure and transport.

Development Interests
Howard Hutton & Associates believe that the Core Strategy will need to be sufficiently flexible to respond to higher levels of growth that are likely to emerge through the examination of the South East Plan. Aroncorp Ltd think a higher level of growth is required to facilitate the provision of the quantum of affordable housing necessary to meet the identified need. Croudace Strategic Limited realise that the delay in the North East Bexhill development has created a Structure Plan housing requirement shortfall. The Core Strategy should aim to rectify this. The ‘Drivers of change’ sections should bring forward suitable sites in the short term to deliver affordable and market housing. The Core Strategy should not seek to address lower levels of growth but, ensure flexibility and housing land supply to meet higher growth levels.

PREM (Rooster) Limited considers that the South East Plan targets the construction of 280 residential units per year for the district with the majority being built on coastal belt. They believe flexibility between the two is crucial in making best use of the opportunities that arise. Home Builders Federation believes that Rother should plan for the highest growth scenario. The Crown Estate think high growth levels would regenerate urban areas and allow provision for rural regeneration which tackle the affordable housing issue. Strutt and Parker see it as important that the Core Strategy reflects the anticipated levels of growth in the South East Plan.

Environmental Groups and Community Bodies
Rye Conservation Society comments that there has to be a correlation between housing growth, infrastructure development and job creation. English Village Projects believes that housing projections should not be allowed to become a justification for levels of growth which allows no flexibility and thereby frustrates other desirable objectives. The National Trust argue that because South East Plan will set future development target sustainable development will only be achieved by a ‘capacity approach’ which would take into account local needs and the potential of the region to accommodate growth.

Businesses
Rother Homes comment is that given the existing age structure within Rother economic growth might intensify the need for extra affordable accommodation because of inward migration.

Individuals
The individuals also agree that high growth levels will improve the variety of housing in the district in tenure and price.
How responses have been addressed in the Policy Direction Document

Objective of the overall spatial development strategy is to meet the development requirements and otherwise accord with the development strategy of the South East Plan. It is noted that the Panel endorsed the housing growth for Rother. Having assessed the potential for more development, it is considered that there would be considerable environmental impacts if higher a level of development were pursued.

It is recognised that development will need to be considered against need to protect and enhance the distinctive landscape character of the AONB. No large growth of AONB settlements is proposed.

The part that development has to play in regeneration is recognised with a strong emphasis on facilitating economic development, as set out in the Economy section, and on ensuring sufficient infrastructure is available for development to proceed (see Overall Spatial Strategy).

Development in Existing Settlement Boundaries

Question 11

Which of these scenarios (for new allocations) is likely/appropriate, having regard to the likely trends and implications both for urban areas and the need to develop greenfield land?

Responses to this Question: total number 15

Howard and Hutton & Associates (Mr Roger Hutton) [4927]
Aroncorp Ltd [4935]
Crowhurst Parish Council (Mrs. Pat Buckle) [4950]
Rye Conservation Society (Mr. K.R.F Bird) [4962]
Croudace Strategic Limited [4967]
Mrs. P.C ward Jones [4978]
Mr. and Mrs. Appleby [4983]
English Village Projects [5002]
PREM (Rooster) Limited (Mr. Richard Thomas) [5011]
East Sussex County Council (Mr. Nick Claxon [5015])
Crown Estates [5030]
Rother Homes (Mr. Tony Streeter) [5034]
Strutt & Parker (Mr. Craig Noel) [5058]
Mr. David Vereker [5065]
Rother Voluntary Action (Mr. M.J Fisher) [5067]

Main Points and Common Themes

There were relatively few responses compared to other questions, but with a mixture of respondents. These included Local Authorities and Government organisations,
developer interests, environment groups and community bodies, businesses and individuals. Mixed feelings are apparent in this section.

The main issue to draw from this section is the difference of opinion between those who favour Scenario B: Dynamic growth and those who favour Scenario C: Diminishing supply.

**Local Authorities and Government Organisations**

**County Council**
East Sussex County Council believe that it is advisable to plan for Scenario B (Dynamic growth). They think that scaling back greenfield allocations in expectation of higher brownfield yields will be problematic in the long term if brownfield site development maintains current levels. Their view is that more greenfield sites should be released and if local housing market improves it would be easier to phase back the release of Greenfield allocations in response to higher brownfield yields. In education terms they point out that flats generally mean 15% less school age children which could have an adverse effect on school numbers and education provision.

**Parish Councils**
Crowhurst Parish Council thinks that any scenario which maintains greenfield land is preferred. (This is essentially Scenario B).

**Developer Interests**
Howard Hutton & Associates believe Scenario B Dynamic growth will achieve the Government’s ambitions on housing supply. Whereas Aroncorp Ltd think Scenario C Diminishing Supply is most appropriate. Croudace Strategic Limited believes that the Council should robustly assess previously developed land as loss of brownfield sites can result of loss in example employment land and have a significant effect on the Districts economy. They also see that greenfield development is required to meet housing requirements and Core Strategy Objectives. PREM (Rooster) Ltd would like the Mill Site at Robertsbridge included for residential development. Crown Estates support Scenario C and see it better for rural regeneration. Strutt and Parker believe that the continuation of recent intensification is the most likely scenario.

**Environment Groups and Community Bodies**
Rye Conservation Society considers Scenario C to be more likely and more appropriate. Rother Voluntary Action recognises that Bexhill’s population may raise as much as 25% in 10-15 years. Without appropriate infrastructure investment it is a recipe for disaster. High growth Scenario along with infrastructure investment can redress the demographic imbalance and assist in economic regeneration

**Businesses**
Rother Homes feel that existing settlement boundaries are often drawn too close around village settlements and there is often a chance for using adjacent land without harming the village or surrounding countryside.
How responses have been addressed in the Strategy Directions Document

The document recognises the emphasis in Government’s subsequent PPS3 on identifying sites. However, the strategy still aims to ensure that best use should be made of brownfield land, before using greenfield sites for development.

A Strategic Housing Land Availability Assessment (SHLAA) will determine the potential for brownfield allocations, and for windfall sites.

The continued use of development boundaries will focus much development within settlements, while new growth will be primarily directed towards vibrant locations that offer a range of employment, services and facilities – thereby complementing community life. However, environmental and other amenity impacts may limit potential for development in some circumstances, both within and on the edge of settlements.

Question 12

Is this split (as draft South East Plan) between the coastal belt (mainly Bexhill and the fringes of Hastings, but also including Rye) and the rest of the district appropriate having regard to their respective needs, opportunities and constraints?

Responses to this Question: total number 11

Aroncorp Ltd [4935]
Crowhurst Parish Council (Mrs. Pat Buckle) [4950]
Rye Town Council (Mr. Richard Farhall) [4956]
Rye Conservation Society (Mr. K.R.F Bird) [4962]
Croudace Strategic Limited [4967]
Highways Agency (Mrs. Margaret Pratt) [5007]
Rother Homes (Mr. Tony Streeter) [5034]
Strutt & Parker (Mr. Craig Noel) [5058]
Mr. David Vereker [5065]
Rother Voluntary Action (Mr. M.J Fisher) [5067]
Natural England (Mr. Kristoffer Hewitt) [5088]

Main Point and Common Themes

Again as for the first question of this section there were a low number of responses. However, most agreed with what was said and answered yes thinking that the rural coastal split was correct way of dividing the area.
Councillors
Town and Parish Councils
Rye Town Council thinks development should take place largely on the district brownfield sites and the Bexhill-Hastings fringe. Crowhurst Parish Council answered yes to the question.

Development Interests
Aroncorp Ltd and Strutt and Parker answer yes to the question. Croudace Strategic Limited acknowledges the coastal and rural areas have different needs. As the South East Plan has allocated two different housing requirements they believe it should be stringently applied and used as a suggested housing requirement rather than an absolute requirement. Meaning that, there is less opportunity of overheating in the coastal market whilst maintaining appropriate growth in rural areas.

Environmental Groups and Community Bodies
Rye Conservation Society believes that Rye would be better placed in the rural belt rather than coastal belt. They support the South East Plan that there is no scope for greenfield expansion to east of Eastbourne/ Hailsham and Bexhill. They urge the LDF to incorporate this conclusion. Natural England wants care to be taken bordering and including the AONB and not conflicting with policies between reducing flood risk and need for development. Rother Voluntary Action thinks it is sensible to treat Bexhill in line with development in Hastings and a rural/coastal split seems logical.

How responses have been addressed in the Strategy Directions Document

The Overall Development Strategy for the distribution of development aims to meet the development requirements of the South East Plan including maintaining an approximate balance of development between the ‘Sussex Coast’ and rest of the district.

The South East Plan recognises that there is some flexibility in the split of development, and the Strategy envisages a somewhat higher proportion in the ‘Sussex coast’ part of the District in order to help support regeneration as well as recognising the constraints on development in the AONB.

The Sussex Coast is not regarded as a single unit: Bexhill and Rye are treated individually.

Area Strategy (A) Bexhill and the Fringes of Hastings

Question 13

Should the current objectives for Bexhill be carried forward or amended to incorporate any of the aspects identified above (in Section 13 of the Issues and Options document) and, if so in what ways?

Responses to this Question: total number 8

Crowhurst Parish Council (Mrs. Pat Buckle) [4950]
Main Points and Common Themes

This question had a very low number of responses however, all main groups development interests, environment groups and community bodies, business and an individual were represented. There was no common theme under this section. Each respondent made a different comment probably due to their different agendas.

Development Interests
Croudace Strategic Limited thinks that Bexhill’s development potential is reliant on the delivery of the link road. The Core Strategy must be flexible enough to allow for a different approach to development if the link road is not delivered.

Environment Groups and Community Bodies
BALI would support eco-friendly development in North Bexhill, recognising the need for affordable housing and more jobs. The Environment Agency would like it to be remembered that for the Area Strategy when considering the linkages between Bexhill and Hastings, the Combe Haven area offers a natural buffer between the two towns. The area has both flood risk and biodiversity issues will influence the decision made in the area. Bexhill and District Garden and Allotment Society see no need for a hotel. Rother Voluntary Action sees the objectives under Policy BX1 to be limited and tame.

Business
Rother Homes would like Bexhill to become more self sufficient in respect of jobs at the same time as expanding its retail, recreational and commercial sectors. Bexhill should however retain a clear identity and independence of Hastings.

Individual
The individual thinks there is little point looking at future objectives until road and rail is improved.

How responses have been addressed in the Strategy Directions Document

Objectives for Bexhill have evolved since the Local Plan, such as looking at ways to widen the appeal of the town. Although feedback was limited (and will be encouraged at this next stage), when combined with related responses regarding the economy, environment, transport and overall distribution of development, the emerging Strategy responds to points raised insofar as:

- the relationship of development to the Link Road is identified
- the economic interdependence of Bexhill and Hastings is being tackled in a co-ordinated way by the two Councils
the independent identity of Bexhill is emphasised and supported by the establishment of the Countryside Park between it and Hastings. Major development will be expected to meet high sustainability standards.

Question 14

What are the main issues and options that should guide the use of land on the fringes of Hastings that fall in the Rother District?

Responses to this Question: total number 7

Crowhurst Parish Council (Mrs. Pat Buckle) [4950]
Croudace Strategic Limited [4967]
Mr. A. Miskin [4975]
Mrs. P.C Ward-Jones [4978]
Rother Homes (Mr. Tony Streeter) [5034]
Forestry Commission (Ms. Jane Hull)
Natural England (Mr. Kristoffer Hewitt) [5088]

Main Points and Common Themes
Again there was a low response rate for this question. The important point mentioned here are the development concerns around the Hastings fringe area and how this issue should be pursued.

Local Authorities and Government Organisations
Parish Councils
Crowhurst Parish Council feels threatened because of the major office development West of Queensway and the proposed link road. There fear losing Crowhurst train station and becoming a part of Hastings and Bexhill Conurbation.

Development interests
Croudace Strategic Limited believe there to be sufficient opportunity for brownfield development within Hastings avoiding the need to develop its fringes. Meaning the Core Strategy shouldn’t consider fringe development.

Environmental groups and Community Bodies
Forestry Commission doesn’t want further development on woodland in the Hastings area.

Businesses
Rother Homes believe that the expansion of Bexhill will require additional affordable housing within the larger Bexhill boundary. Section 106 concerning affordable housing should be standardised robust and watertight. Considering that Bexhill is one of two main growth areas in East Sussex, Rother Homes suggest that Rother District Council seek support from the Housing Corporation to grant fund schemes to ensure that affordable housing opportunities are maximised.

Individuals
An Individual supports taking a long term view of Bexhill’s development. They would like to see the strategy establish a phased growth framework with short and medium
term sites based on interim infrastructure solutions. Another would like to see the Wilting Farm site mentioned as a possible site for development to be fully considered at the Site Allocation stage.

**How responses have been addressed in the Strategy Directions Document**

A joint approach to management of the urban fringes is proposed with Hastings Borough Council. This will include maintaining effective countryside gaps between Hastings and Bexhill, Crowhurst, Battle and Fairlight.

There is accepted to be limited potential for development in the Hastings fringes, but some opportunities exist, mainly to the west of the town. Further work is needed to establish the feasibility of a new station, which will include consideration of its effects on existing stations.

**Question 15**

*Which development option is most appropriate and why?*

**Responses to this Question:** total number 18

Wm. Morrison Supermarkets Plc [4920]
Crowhurst Parish Council (Mrs. Pat Buckle) [4950]
Hastings Borough Council (Mr. Roy Mawford) [4960]
Rye Conservation Society (Mr. K.R.F. Bird) [4962]
Croudace Strategic Limited [4967]
Mr. A Miskin [4975]
Mrs. P.C Ward-Jones [4978]
Batcheller Thacker (Mr. Nicholas Ide)
Highways Agency (Mrs. Margaret Pratt) [5007]
Bexhill and District Gardens & Allotments Society (Mr. C.R. Bryen) [5009]
East Sussex County Council (Mr. Nick Claxton) [5015]
Home Builders Federation (Mr. Bart Wren) [5017]
Land securities Plc [5047]
The National Trust (Ms. Jane Arnott) [5052]
Forestry Commission (Ms. Jane Hull) [5056]
Wealden District Council (Mr. Alexei Zammit) [5063]
Rother Voluntary Action (Mr. M.J. Fisher)
Southern Water (Ms. Susan Solbra) [5070]

**Main Points and Common Themes**

This question commanded the greatest response of this section. There was however no common consensus for one particular option with some support for all three. The most favoured option however was Option 3.

Option 1 – Maintain Bexhill’s Role
Option 2- Expansion of Bexhill’s Role
Option 3- Coordinated development at Bexhill and on the edge of Hastings

Local Authorities and Government Organisations

County and District Councils
Hastings Borough Council supports Option 3 as also helps Hastings develop and reinforces logic of regional hub. East Sussex County Council is concerned about the 800 dwellings at Wilting Farm. Concerning schooling they believe that housing growth should be planned around the existing spare capacity in primary schools. Wealden District Council support Option 1 but wants suitable infrastructure provision to cater for growth.

Parish
Crowhurst Parish Councils thinks that the redundant Mountfield Gypsum mine site should be developed into a “small new town” and the Mountfield station could be reopened.

The Highways Agency thinks that traffic and transport implications of all proposed locations should be considered and where developments are likely to have significant implications. Transport Needs Assessments including travel plans are needed.

Development Interests
Croudace Strategic Limited considers Option 1 is best despite the potential delays in the delivery of the link road. The Home Builders Federation supports Option 3 and feels that greenfield development is the option which would provide greatest opportunity for improving competitiveness with the rest of East Sussex and Kent. Land Securities plc support Option 3 through improving retail opportunities and leisure facilities.

Environmental Groups and Community Bodies
Rye Conservation Society supports Option 3 however, preserving the recognised strategic gaps between the two settlements as far as possible. Bexhill and District Garden and Allotment Society think that Rother should be left largely unchanged as represents requirements on quality of life. They believe that conserving the countryside and strictly controlling development is not compatible with new development, highways and businesses.

The National Trust finds it difficult to comment on the options, however would support a strategy that focuses development in Bexhill (and Hastings) with restricted development elsewhere. The Forestry Commission has no comment expect there should be no damage to ancient woodlands. Rother Voluntary Action sees option 3 as the most realistic but includes the ambitions of options 2.

Businesses
Batcheller Thacker supports Option 2 and thinks that greenfield development should not be limited to north and North West Bexhill and consideration should be given to development south of the A259. Wm. Morrison Supermarkets Plc believes that because of Bexhill’s character and influencing factors development Option 3 would be most appropriate.
Individuals
One individual sees option 3 as the most advantageous due to the location of the link road. Allowing smaller development at Bexhill will retain its character. On the other hand, another individual thinks the land west of Bexhill identified in options 1 and 2 has a role in delivering the strategy as a major strategic development as part of a wider strategy including strategic infrastructure, or as a smaller stand alone development, or both.

How responses have been addressed in the Strategy Directions Document
A higher level of development envisaged under Option 2 has been considered for Bexhill, but at this stage it is not a preferred option for development due to:

- Economic growth forecasts and housing market conditions do not support growth at this time
- Uncertainties about the additional infrastructure required
- Cumulative impact on the town’s character

There has been progress in both developing regeneration objectives for Hastings and Bexhill, as well as in how this can dovetail with the desire for Bexhill to retain its distinct physical and social identity (as evidenced by house moves). This composite approach is reflected in the aim and objectives for Bexhill and the shared vision for the two towns.

AREA STATEGY (B) BATTLE

Question 16

Should the current objectives for Battle is carried forward or amended and if so, in what ways?

Responses to this Question: total number 8

Howard Hutton & Associates (Mr Rodger Hutton) [4927]
High Weald AONB Unit (Mr. Andrew Shaw) [4944]
Crowhurst Parish Council (Mrs. Pat Buckle) [4950]
Croudace Strategic Limited [4967]
Rother Homes (Mr. Tony Streeter) [5034]
The National Trust (Ms. Jane Arnott) [5052]
Mr. David Vereker [5065]
Rother Voluntary Action (Mr. M.J. Fisher) [5067]

Main Points and Common Themes

From the small number of responses it can be gathered that development that does take place should be small, controlled and sympathetic to the surrounding.
Local Authorities and Government Organisations
Parish Council
Crowhurst Parish Council thinks that the current objectives should be carried forward.

Development interests
Howard Hutton and Associates think that development could fund safer cycle routes and help bring forward the second primary school. Croudace Strategic Limited would like to see the objectives set out in BT1 of the local plan to be carried through to the Core Strategy.

Environmental Groups
The High Weald AONB Unit strongly support paragraph 14.23

In view of its Area of Outstanding Natural Beauty designation, historic core and battlefield and accessibility limitations, it is not anticipated that the Core Strategy should propose that Battle should be focus for higher levels of future growth.

And object to paragraph 14.26

A continuation of the existing Local Plan development strategy to cover timeframe of the Core Strategy would constitute a medium growth option for the town with some new development planned.

The National Trust supports the current objectives for Battle as set out in the Local Plan. Rother Voluntary Action thinks that the opportunities for ongoing development should resist the desire for nothing to change which will lead to stagnation.

Businesses
Rother Homes thinks that because Blackfriars as the only foreseeable large development in Battle a section106 must make sure affordable housing is maximised.

How responses have been addressed in the Strategy Directions Document

In view of environmental constraints, its historic core and accessibility limitations high level growth is not seen as a sustainable option for Battle. The direction focuses on medium growth, to ensure Battle’s continued valuable service centre role.

Question 17
Which development option is most appropriate and why?

Howard Hutton & Associates (Mr. Roger Hutton) [4927]
Wm. Morrison Supermarkets Plc [4920]
Mr Michael Pickup [4939]
Crowhurst Parish Council (Mrs. Pat Buckle)
Hastings Borough Council (Mr. Roy Mawford) [4960]
Croudace Strategic Limited [4967]
Highways Agency (Mrs. Margaret Pratt) [5007]
Main Points and Common Themes
The consensus for this seems to be support for Option 1 - Continued development to support the towns role

Local Authorities and Government Organisations
Borough and County Councils
Hastings Borough favours option 1 while East Sussex County Council thinks that a new primary school will still have to be justified.

Parish Councils
Crowhurst Parish Council supports option 1 to give Battle the best chance to adapt and grow without losing its unique character.

Other
The Highways Agency note that the traffic will be lessened with the link road and Baldslow link.

Development Interests
Howard Hutton & Associates support the medium growth option (option 1).

Environment Groups and Community Bodies
The National Trust believes new development should be infill or redevelopment within the development boundary thereby favouring option 2. Rother Voluntary Action view is that option 1 is most appropriate.

Businesses
Wm. Morrison Supermarkets Plc thinks Option 1 is most appropriate as will enhance Battle role as a service centre. Rother Homes think that due to erosion of renting in Battle, one or two of the smaller sites should be identified as affordable housing.

How responses have been addressed in the Strategy Directions Document

The strategy focuses on medium growth, to ensure Battle’s continued valuable service centre role.

The level of housing growth for the town, identified by assessment of the District wide, spatial distribution options in the Overall Spatial Development Strategy, is based upon the relative service roles of towns and villages within the District with objective (v) seeking to give particular attention to supporting the ‘market towns’ roles of Battle and Rye.

The most benefit to Battle, in terms of recognising the town’s role providing for local economic housing and community needs, could be achieved through medium
growth, providing it is carefully implemented. This would ensure the town’s continued valuable service centre role.

AREA STRATEGY (C) RYE

Question 18

Should the current objectives for Rye be carried forward and amended and, if so, in what ways?

In considering this, you are invited to comment specifically on:

Should the strategy also include any of the following options?
Expand the town’s service centre role, providing enhanced community facilities, shopping and services for the town’s residents and for the surrounding area.
Aim to widen the economic base of the town to encompass a broader range of types of employment
Provide more affordable housing for local people
Other

Responses to this Question: total number 14

Aroncorp Ltd [4935]
Kember Loudon Williams Ltd (Mr. Rodger Nightingale) [4925]
Mr Jeffrey Warley [4936]
Crowhurst Parish Council (Mrs. Pat Buckle) [4950]
Rye Town Council (Mr. Richard Farhall) [4956]
Rye Conservation Society (Mr. K.R.F Bird) [4962]
Croudace Strategic Limited [4973]
Rastrum Ltd. [4973]
Mr. and Mrs. Appleby [4983]
Mr. John Royle [4987]
Rother Homes (Mr. Tony Streeter) [5034]
The National Trust (Ms. Jane Arnott) [5052]
Rother Voluntary Action (Mr. M.J Fisher) [5067]
Natural England (Mr. Kristoffer Hewitt)

Main Points and Common Themes

From the responses received it can be gauged that the objectives in the Core Strategy are appropriate.

Local Authorities and Government Organisations
Parish Council
Crowhurst thinks that Rye has a potential for growth that, if managed positively, would not distract from its unique character. They should look towards Eastbourne to see the potential development of a large marina and low rise associated housing projects. Rye Town Council would like it noted that the A259 is frequently congested.
They also think that Rye industrial area should be developed to its maximum potential in tandem with a greatly improved east west road link.

Development Interests
Kember Loudon Williams Ltd believes that medium to high level of growth should be aimed for. They think that initiatives that allow the strength and diversity of the economic base of the town to enhanced. Recognise and facilitate the need for regeneration. Croudace Strategic Limited thinks that objectives for Rye should be maintained and carried forward into Core Strategy. However, would like to see flexibility to allow any changes for physical constraints.

Environmental Groups and Community Bodies
Rye Conservation Society considers the objectives proposed for Rye will remain valid throughout the LDF timeframe. They consider that tourism will remain as the principle economic activity with more light industrial at Rye Harbour and increased home working will provider concomitant drivers towards economic growth and prosperity. It would like Rye to expand its range of specialist shop. National Trust support the objectives set out for Rye and support the lower growth option of infilling and redevelopment. Rother Voluntary Action believes that Rye needs to engage with its hinterlands to encourage people who live just outside the town to use it. Natural England thinks that the environment of Rye and Rye Harbour is an important economic asset.

Businesses
Rastrum supports the protection of nature conservation however, would like a balance maintained between nature conservation and people having a good standard of living including the right of employment. Rother Homes would like to see limited growth in respect to retail, housing, employment and residential. Affordable housing quotas must be maintained.

Individuals
The individuals recognise that Rye needs growth some housing and employment growth but discounts high growth. They see the port as a valuable asset as it has an established market as well as capacity to accommodate larger vessels. Major road improvements to A259 are also seen as a priority.

How responses have been addressed in the Strategy Directions Document

In support of the overall strategy for Rye and Rye Harbour it is proposed that policies will support:

Environmental conservation and enhancement
Apart from policies that seek to preserve and enhance the historic citadel, the built environment generally and its unique landscape setting, it is also proposed to designate a strategic gap between Rock Channel and the industrial development in Harbour Road to help deliver the tidal and non tidal defences and promote green tourism in the area.
**Services and community development**
This includes the delivery of a new library, sustainable transport and prioritisation of improvements to play areas and amenity spaces.

**Economy and jobs**
Support job creation and green tourism initiatives

**The town centre**
Provide for new convenience shopping and deliver public realm improvements

**Housing**
Bring forward Local Plan allocations and identify areas for housing growth to meet the residual requirements.

**Accessibility**
Provide green transport infrastructure and connectivity routes within the town. Seek to secure road and junction improvements

Question 19

Which development option is most appropriate and why?

In considering this, you are invited to comment specifically on:

Whether or not it is correct to discount a high level of growth for Rye?

**Responses to this Question**: total number 18

Aroncorp Ltd [4935]
Wm. Morrison Supermarkets Plc [4920]
Kember Loudon Williams Ltd (Mr Roger Nightingale) [4925]
High Weald AONB Unit (Mr Andrew Shaw) [4944]
Mr Jeffrey Warley [4936]
Crowhurst Parish Council (Mrs. Pat Buckle) [4950]
Rye Town Council (Mr Richard Farhall) [4962]
Rye Conservation Society (Mr. K.R.F Bird)
Croudace Strategic Limited [4967]
Rastrum Ltd. [4973]
Mr. and Mrs. Appleby [4983]
Highways Agency (Mrs Margaret Pratt) [5007]
East Sussex County Council (Mr. Nick Claxton) [5015]
Forestry Commission (Ms. Jane Hull) [5056]
Mr. David Vereker [5065]
Rother Voluntary Action (Mr. M.J Fisher) [5067]
Southern Water (Ms. Susan Solbra) [5070]
Environmental Agency (Ms. Claerwyn Hughes) [5082]
Main Points and Common Themes
The consensus of commercial interests for Rye is that Option 1 is the preferable option, while Rye Town Council takes a contrary view.

Option 1 – Enhancement of services centre role

Option 2- Consolidation

Local Authorities and Government Organisations

County Council
East Sussex County Council forward school planning is not focused on high level growth.

Town Council
Rye Town Council preference is for Option 2.

Other
Highways Agency requests a Transport Assessment is carried out on large scale development.

Development Interests
Aroncorp Ltd think Option 1 is the most appropriate as it offers the opportunity to provide enhanced community facilities, affordable housing and improved employment prospects. Croudace Strategic considers that the current development option with a degree of flexibility to ensure towns physical constraints can be accommodated.

Environment Groups and Community Bodies
High Weald AONB Unit sees any encroachment of development onto the AONB as detrimental. Environmental Agency would like to see the identification of contamination and pollution of controlled water considered in the area strategy for Rye. Rother Voluntary Action thinks that Rye cannot survive without adequate levels of growth.

Businesses
Wm. Morrison would like to see Option 1 taken forward. Rastrum Ltd will favour Option 1 including the Salting as an area for development. Southern Water is committed to meeting the demand for water and waste water services arising from new development, as identified in adopted DPD’s.

How responses have been addressed in the Strategy Directions Document

It is not proposed in the Strategy Directions document that Rye be a focus for high levels of growth.

The level of housing growth for the town, identified by assessment of the District wide spatial distribution options in the Overall Spatial Development Strategy, is based upon the relative service roles of towns and villages within the District with
objective (v) seeking to give particular attention to supporting the ‘market towns’ roles of Battle and Rye.

Based on its service role some 450 dwellings are proposed within the plan period, and detailed analysis has shown that this figure is achievable (by virtue of commitments, recent completions and unimplemented allocations). Taking away development within these categories, this leaves new allocations to find of some 20 dwellings.

AREA STRATEGY (D): RURAL AREAS

Question 20

Is it appropriate to have an overall vision and objections for rural areas and, if so, what should the guiding objectives be?

High Weald AONB Unit (Mr Andrew Shaw) [4944]
Crowhurst Parish Council (Mrs. Pat Buckle) [4950]
Etchingham Parish Council (Mrs S Cobain) [4958]
Bodiam Parish Council (Mrs. H.E. Lewis) [4958]
Rye Conservation Society (Mr K.R.F Bird) [4962]
Croudace Strategic Limited [4967]
Mr. Nicholas Diment [4991]
English Village Projects [5002]
Home Builders Federation (Mr Bart Wren) [5017]
The Crown Estate [5030]
Rother Homes (Mr Tony Streeter) [5034]
The National Trust (Ms. Jane Arnott) [5052]
Forestry Commission (Ms. Jane Hull)
Strutt and Parker (Mr. Craig Noel) [5058]
Mr David Vereker [5065]
Rother Voluntary Action (Mr M.J. Fisher) [5067]
Rother Valley Railway (Mr S.G.N. Bennett) [5084]

Responses to this Question: total number 17

Main Points and Common Themes
The overall majority of respondents comment that there is a need to have a rural vision within the Core Strategy.

Local Authorities and Government Organisations

Parish Councils
Crowhurst Parish Council thinks that there should be an overall vision and objective for rural communities. The guiding objectives should be to preserve the character of small villages, they have a special ‘quality of life’. Etchingham Parish Council thinks that sustainability, protecting the landscape qualities and the economic and social needs of communities are important. Bodiam Parish wants there to be acceptance by local government and incomers of the differences between rural and urban areas.
Development Interests
Croudace Strategic Limited believes it is essential that rural areas in the Core Strategy have a specific vision. The Home Builders Federation feels it is necessary to have a spatial vision for rural areas. They believe that the guiding objective is to ensure the sustainability of rural communities through providing for their needs, in the form of housing provision.

Crown Estates feel an innovative approach should be taken for rural areas. Priority should be given to creating mixed communities that support local services and employment rather than giving priority to conserving and preserving the AONB. Strutt and Parker thinks that paragraph 16.23 (a-o) are laudable but not mutually exclusive and (a), (b) and (o) are not considered worthy under the listed objectives.

Environmental Groups and Community Bodies
High Weald AONB Unit sees it as important to have a rural policy and vision. They believe that to conserve and enhance the AONB requires supporting land management and local based industries and activities as well as promoting the sustainable character of small rural settlements. English Village Projects think that it is important to have an overall rural vision. However, they note that no attempt has been made to identify those characteristics of the individual’s villages which harm their appearance and character and no consideration has been given to how to redress harm.

Rye Conservation Society supports all strategy directions proposed. The National Trust supports objectives and feels they should include support for rural diversification and the protection and enhancement of the built environment of villages. The Forestry Commission thinks that the vision needs to consider more than just housing development.

Rother Voluntary Action thinks that there should be an overarching vision with the flexibility to respond to local needs. Rother Valley Railway will help secure the following objectives for rural areas (h) –the fostering of tourism that is compatible with and draws on heritage and countryside qualities of rural areas. (i) Improved access for basic day to day goods and services by public transport, and (n) the encouragement of access to the countryside and appropriate leisure activities.

Businesses
Rother Homes thinks that derelict agricultural building should be converted and the existing village boundaries reviewed.

Individuals
The individuals support a development strategy that provides residential development within rural areas but doesn’t encroach on AONB.
How responses have been addressed in the Strategy Directions Document

Rural Areas have been addressed in the Spatial Strategy section of the document, and have been developed in response to the national and regional policy context.

An overall aim for the rural areas has been developed in order to:

‘To meet the local needs and promote vital, viable and support vibrant mixed communities in the rural areas, whilst giving particular attention to the economic, ecological, public enjoyment and intrinsic value of the countryside’.

In order to address the particular needs of the rural villages, the Rural Settlement Strategy has been prepared as a background evidence study. This study aims to contribute towards the ‘Place-shaping’ of individual villages. It has helped to inform the Core Strategy and has recommended a preferred spatial distribution of development based upon service centres and to meet local needs. The study has defined a three tier hierarchy of villages based upon service role and included an appraisal of individual villages which recognises the importance of environmental and landscape factors.

Countryside policies have been developed in the Core Strategy that address rural diversification, the re-use of derelict agricultural buildings and other matters.

Question 21

Which option for the distribution of the new development in rural areas is most appropriate and why?

Howard Hutton & Associates (Mr. Roger Hutton) [4927]
High Weald AONB Unit (Mr Andrew Shaw) [4944]
Crowhurst Parish Council (Mrs. Pat Buckle) [4950]
Beckley Parish Council (Mrs. H. Scott) [4954]
Etchingham Parish Council (Mrs. S Cobain) [4954]
Rye Conservation Society (Mr. K.R.F Bird) [4962]
Croudace Strategic Limited [4967]
English Village Projects [5002]
Highways Agency (Mrs. Margaret Pratt) [5007]
PREM (Rooster) Limited (Mr. Richard Thomas) [5011]
East Sussex County Council (Mr. Nick Claxon) [5015]
Home Builders Federation (Mr.Bart Wren) [5017]
Government Office for the South East (Ms. Philippa Sambrook)
Mrs. Linda Gibson [5025]
The Crown Estate [5030]
Rother Homes (Mr. Tony Streeter) [5034]
Mr. Christopher Strangeways [5040]
The National Trust (Ms. Jane Arnott) [5052]
Strutt & Parker (Mr. Craig Noel) [5058]
Persimmon Homes (South East Limited) [5059]
Responses to this Question: total number 17

Main Points and Common Themes

Option 1 – Continue to focus on Service Centres

Option 2 – Development to Support Community Needs and Deficiencies

Option 3 – Focus development on a few larger Villages

Option 4 – Dispersed Development

From the responses received it can be concluded that there is no consensus between any of the above option. The responses received were mixed however all groups were in favour of development of some kind.

Local Authorities and Government Organisations

County and District Councils

East Sussex County Council think option 2 and 4 in terms of outcomes there is little to differentiate. Option 1 and 3 seem to be the variation on the theme. They reflect the methodology adopted by the County Council in determining the housing distribution for the “Rest of Sussex”. Wealden District Council think that dispersed development within the rural areas should ensure that this is not detrimental to the setting of villages within rural landscapes.

Parish Councils

Crowhurst Parish Council thinks that new development should be distributed in accordance with paragraph 16.25 from policy DS2 (iv) – development where village already have a range of services which will support it. Beckley Parish Council support Rother District Council local plan which, for Beckley contains five delineated development areas along Main Street and Hobbs Lane. They would strongly resist development in other areas of their village. Etchingham Parish Council support Option 2.

Other

Highways Agency expects the local planning authorities to assess the impact of the new trunk road network of rural growth options. They would to see emerging policies that would minimise demand at the source and require the mitigation of trunk road impacts throughout all stages of development planning, implementation and operation.

Development Interests

Howard Hutton & Associates supports Option 2 as it accords with the concept of ‘deficit planning’. Croudace Strategic limited support Option 1 as it allows for
development in a variety of settlements. They think that Option 2 and 4 do not accord with Government policy. PREM (Rooster) Limited illustrate that there has been a loss of local facilities and the lack of affordable housing is a problem. They suggest that the re-development of Robertsbridge Mill would provide an opportunity for affordable housing. Also they think that opportunities in rural areas should not be ignored. Development should focus on the service centres.

The Crown Estate support option 4. Permission Homes thinks there should be some dispersal of development around rural areas in the larger settlements. They endorse Option 1 as it complies with PPS3. Home Builders Federation thinks that Option 1 and 2 are most appropriate. The Government Office for the South East think that Option 1 and 3 overlap and Option 2 and 4 overlap in relation to PPS 7 for (a) focusing development in, or near existing local rural services, together with (b) some provision for limited development in other settlements as well

Environment Groups and Community Bodies
High Weald AONB would like Option 4 to be explored in detail, supporting the dispersed development approach. English Village Projects believes Option 4 to be the correct option. Rye Conservation Society think Option 2 should be pursued. The National Trust supports Option 1 because it is most likely to meet local needs in the District. Rother Voluntary Action believes that all options have their merits.

Businesses
Rother Homes feels that rural settlements need more affordable housing even if they have lost most or all of their services. However, rural development is preferable in settlements where there is a range of existing services. They think that where services are at risk they should benefit from preferential and flexible planning decisions.

Individuals
The individuals support development in suitable rural locations however, would like the village boundaries to be maintained.

How responses have been addressed in the Strategy Directions Document

From the 17 responses to question 21, it was concluded that there was no consensus from respondents for the preferred option for distribution for development. Rural Settlement Study Background Paper has identified a number of spatial options for the rural areas and this information has fed into the Strategy Directions document.
### Appendix 6 – Feedback from Residents questionnaire

<table>
<thead>
<tr>
<th>RURAL ROTHER</th>
<th>BATTLE</th>
<th>RYE</th>
<th>BEXHILL</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Residents Questionnaire</strong></td>
<td><strong>Residents Questionnaire</strong></td>
<td><strong>Residents Questionnaire</strong></td>
<td><strong>Residents Questionnaire</strong></td>
</tr>
<tr>
<td><strong>Important qualities in making a good place to live</strong></td>
<td><strong>Important qualities in making a good place to live</strong></td>
<td><strong>Important qualities in making a good place to live</strong></td>
<td><strong>Important qualities in making a good place to live</strong></td>
</tr>
<tr>
<td>Facilities which &gt;70% respondents identified as ‘important’ or ‘essential’: PO (83%) shops for day to day purchases (81%) doctors surgery (74%) regular bus services (72%) village/community hall (71%) safe/convenient pedestrian access to services (71%)</td>
<td>Facilities which &gt;70% respondents identified as ‘important’ or ‘essential’: doctors surgery (89%) shops for day to day purchases (89%) PO (88%) chemist (83%) regular bus services (80%) convenient parking at facilities (75%) safe/convenient pedestrian access to services (72%)</td>
<td>Facilities which &gt;70% respondents identified as ‘important’ or ‘essential’: doctors surgery (93%) shops for day to day purchases (93%) easy access to a railway station (89%) safe/convenient pedestrian access to services (89%) chemist (86%) regular bus services (85%) PO (78%) mix of house types/sizes/prices (71%)</td>
<td>Facilities which &gt;70% respondents identified as ‘important’ or ‘essential’: shops for day to day purchases (86%) chemist (78%) PO (75%) doctors surgery (83%) regular bus services (74%) safe/convenient pedestrian access to facilities (80%) convenient parking poor at facilities (79%)</td>
</tr>
<tr>
<td>Facilities which &gt;10% respondents identified as ‘unimportant’ chemist (10%) jobs/business site locally (17%) safe/convenient cycle access to services (18%) sports/leisure facilities (21%) cash point (29%)</td>
<td>Facilities which &gt;10% respondents identified as ‘unimportant’ safe/convenient cycle access to services (11%) play space (22%) sports/leisure facilities (22%) mix of house types/sizes /prices (22%)</td>
<td>Facilities which &gt;10% respondents identified as ‘unimportant’ safe/convenient cycle access to services (11%) sports/leisure facilities (11%)</td>
<td>Facilities which &gt;10% respondents identified as ‘unimportant’ village hall/community hall (16%) cash point close by (13%) sports/leisure facilities (12%) safe/convenient cycle access to services (10%) mix of house types etc.</td>
</tr>
<tr>
<td>Qualities in the place you live</td>
<td>Rural Rother</td>
<td>Battle</td>
<td>Rye</td>
</tr>
<tr>
<td>-------------------------------</td>
<td>-------------</td>
<td>--------</td>
<td>-----</td>
</tr>
<tr>
<td>Facilities where &gt;70% respondents considered access to be ‘good’ or ‘very good’</td>
<td>village/community hall (79%) PO (78%) Access to the countryside (77%)</td>
<td>Facilities where &gt;70% respondents considered access to be ‘good’ or ‘very good’ Chemist (90%) Doctors surgery (90%) PO (90%) Shops for day to day purchases (83%) Access to the countryside (75%) Cash point (72%)</td>
<td>Facilities where &gt;70% respondents considered access to be ‘good’ or ‘very good’ PO (86%) Cash point (82%) Easy access to a railway station (79%) Chemist (79%) Shops for day to day purchases (75%) Regular bus services (75%) Access to the countryside (75%) Doctors surgery (71%) Sports/leisure facilities (71%)</td>
</tr>
<tr>
<td>Facilities which &gt;10% respondents considered access to be ‘poor’ or ‘very poor’ PO (15%) Doctors surgery (17%) Shops for day to day purchases (20%) Safe/convenient pedestrian access to services (27%) convenient parking at facilities (27%) Sports/leisure facilities (30%) Regular bus services (34%) easy access to a railway station (34%) Chemist (39%) Cash point (39%) Safe/convenient cycle access</td>
<td>Facilities which &gt;10% respondents considered access to be ‘poor’ or ‘very poor’ Regular bus services (14%) Safe/convenient cycle access to services (14%) Safe/convenient pedestrian access to services (14%) Mix of house types/sizes/prices (19%) convenient parking at facilities (31%)</td>
<td>Facilities which &gt;10% respondents considered access to be ‘poor’ or ‘very poor’ Safe/convenient cycle access to services (11%) Safe/convenient pedestrian access to services (11%) easy access to a railway station (11%) Doctors surgery (14%) Village/community hall (14%) convenient parking at facilities (21%) Mix of house types/sizes/prices (64%)</td>
<td>Facilities which &gt;10% respondents considered access to be ‘poor’ or ‘very poor’ Access to shops for day to day purchases (11%) Access to a post office (13%) Access to childrens play space (13%) Access to a village hall/community hall (14%) Access to sport and leisure (16%) Access to a regular bus service (24%) Safe/convenient cycle access to services</td>
</tr>
<tr>
<td>RURAL ROTHER</td>
<td>BATTLE</td>
<td>RYE</td>
<td>BEXHILL</td>
</tr>
<tr>
<td>-------------</td>
<td>--------</td>
<td>-----</td>
<td>---------</td>
</tr>
<tr>
<td>to services (40%) Mix of house types/sizes/prices (41%) Jobs/business sites locally (53%)</td>
<td></td>
<td></td>
<td>(31%) Safe/convenient pedestrian access to services (17%) convenient parking at facilities (41%) easy access to a railway station (17%) Jobs/business sites locally (36%) Mix of house types/sizes/prices (21%)(64%)</td>
</tr>
</tbody>
</table>

| No. respondents/age breakdown | No. respondents: 242 (57% male; 42% female) Age Group: u25 – 1%, 25 to 40 – 12%, 41 to 64 – 48%, 65+ - 39% | No. respondents: 36 (57% male; 42% female) Age Group: u25 – 3%, 25 to 40 – 28%, 41 to 64 – 33%, 65+ - 36% | No. respondents: 28 (54% male; 46% female) Age Group: u25 – 0%, 25 to 40 – 0%, 41 to 64 – 43%, 65+ - 57% | No. respondents: 137 (51% male; 49% female) Age Group: u25 – 4%, 25 to 40 – 13%, 41 to 64 – 42%, 65+ - 41% |

<p>| Themes | More than 10% of the rural respondents judged access to each of 13 (out of 17) services/facilities as being poor or very poor. Many of these same facilities/services were identified by the majority as being important or very important in making a village a good place to live. Of these important facilities, only access to a village hall and a PO was judged currently to be | For Battle, car parking at facilities was the issue identified by the highest proportion of people as being poor/very poor as well as registering as an important consideration in making a good place to live. Access to uses associated with a town centre – shops, cash point, doctors surgery – were generally judged to be good and this matched the pattern of facilities which were highlighted by many as being important/very important in making a good place to live | Generally there was good parity in Rye between the issues considered to be important and the access to them in the town. However, concern about the diversity and availability of housing emerged as a more significant issue in Rye than in the other geographic areas. Anecdotally, there is a local concern about the number of second homes in the town (9% according to Council Tax records) and the impact that this has on house prices relative to local | What is interesting about the results for Bexhill is that whilst 7 facilities were seen as important qualities in making a good place to live by more than 70% of respondents, only 1 facility (doctors surgery) by the same percentage of people was considered to have good or very good |</p>
<table>
<thead>
<tr>
<th>RURAL ROTHER</th>
<th>BATTLE</th>
<th>RYE</th>
<th>BEXHILL</th>
</tr>
</thead>
<tbody>
<tr>
<td>good/very good by the majority. Also of note is that access to local jobs/business sites did not emerge as a particularly significant issue in making a good place to live, relative to other considerations, although more than half measured this factor as poor/very poor currently. The age range of the respondents could have been an influence on this finding – 39% of respondents were over retirement age.</td>
<td></td>
<td>incomes. Access to a railway station was judged to be 'important' but was identified as a 'poor' characteristic in Rye by over 10% (but not in Battle). Local jobs/employment sites did not emerge as a particularly significant issue for residents in contrast to the Issues/Options responses (see above). It is also of note that all the responses from Rye came from respondents aged 41 or above.</td>
<td>accessibility. Therefore the main urban area of Rother District is perceived as having the least accessibility to day to day services and facilities. This is backed up by the feedback whereby &gt;10% respondents considered access to be 'poor' or 'very poor' to 12 day to day services and facilities. Accessibility to shops was considered to be the most important quality in making a good place to live, with a community hall having the greatest number of respondents who considered it as unimportant. Some 31% of residents consider that access to facilities bicycle to be 'poor' or 'very poor' with 17% considering that pedestrian access to facilities and 24% feel that access to a regular bus service also being 'poor' or 'very poor'. Better access to jobs, as well as housing availability/affordability,</td>
</tr>
<tr>
<td>RURAL ROTHER</td>
<td>BATTLE</td>
<td>RYE</td>
<td>BEXHILL</td>
</tr>
<tr>
<td>-------------</td>
<td>--------</td>
<td>-----</td>
<td>---------</td>
</tr>
<tr>
<td><strong>Summary Responses</strong></td>
<td>The strategy for Rural Areas acknowledges the importance of community facilities, by a presumption for their retention as well as promoting new and improved facilities. Local needs for better sports/leisure provision has been the subject of a comprehensive study, the results of which are contained in the Communities Strategy. The availability of key services, including shops, post office, chemist are identified when assessing the potential for sustainable development. The strategy looks specifically at stimulating more affordable housing in rural areas, as well as jobs. The importance of bus services is highlighted.</td>
<td>Parking provision is recognised as a key issue within the strategy, and additional town centre parking is specified. Also associated with accessibility and safe movement is the aim to reduce unnecessary cross-town traffic. The Link Road will help divert through traffic out of the town; while proposed better bus services to Hastings will also assist, and help respond to concerns over bus access.</td>
<td>Housing issues (including the high need for affordable housing in the town) are recognised in the strategy, insofar as addressing socio-economic conditions is an overall theme. New housing developments will need to provide an appropriate mix of accommodation and a high percentage of affordable housing. This is being pursued on existing allocations. Accessibility around the railway station is currently being addressed by the County Council.</td>
</tr>
</tbody>
</table>
Appendix 7 – Cabinet Report

Rother District Council                                    Agenda Item: 6.1

Report to - Cabinet
Date - 23 June 2008
Report of - Director of Services
Subject - Local Development Framework Core Strategy

Recommendation to COUNCIL: That

the aims, objectives, strategies and 'policy directions' set out in the synopsis of the LDF Core Strategy Preferred Options, attached at Appendix 1 be approved;
Cabinet be authorised to approve the full Core Strategy Preferred Options consultation document; and
further informal views be sought from the Town and Parish Councils, Local Strategic Partnership members and main delivery bodies, and that Cabinet consider the feedback from this in approving the full document for public consultation.

Head of Service: Roger Scott (Acting)
Lead Cabinet Member: Councillor Osborne

Introduction

The Council has a responsibility under the Planning and Compulsory Purchase Act 2004 to prepare documents as part of a ‘Local Development Framework’ (LDF). A necessary component of the LDF, and indeed the cornerstone of it, is a Core Strategy. This should set out the Council’s overall strategy for development and change in the District over a period of at least 15 years from its adoption. It should provide a clear framework, and priorities, for shaping change in the district and the place within it.

Consultation on Issues and Options for development up to 2026 took place in Autumn 2006. Feedback from that has informed further work to refine and elaborate the broad options that were consulted upon. There has also been substantial additional evidence gathering, including on employment needs, retailing, flood risk, recreation needs and transport capacity.

The process of plan preparation currently provides for a further stage of consultation – on ‘Preferred Options’ prior to formal submission of the Core Strategy for examination by an independent Inspector. This is the stage we are at now.

Circulated as a separate document, Appendix 1 is a synopsis of the proposed consultation document that seeks views on the preferred strategy and policy directions for the Core Strategy. It is not a draft of the document itself. It omits much contextual material and provides a relatively brief background to the preferred options.
Presenting it in this form to Members, and in advance of seeking a formal decision on
the full document, is intended to:

- Focus consideration on the key matters for decision;
- Enable all Members’ views to be fully reflected in the final document; and
- Provide an opportunity for any fundamental concerns of key stakeholders – Town
  and Parish Councils, the Local Strategic Partnership and main delivery bodies - to be
  reported and considered in advance of public consultation

In order to avoid undue delays in putting the document before the public, (which
would create uncertainty and confusion), it is proposed that further consultations are
informal to enable that the full document to be presented to Cabinet on 4 August for
approval for the purposes of public consultation. All organisations will have ample
opportunity to input to the process during the formal consultation period.

This approach will also enable consideration of the implications of revised
Regulations for LDF preparation which have just been published and will come into
effect on 27 June 2008. These remove the current ‘Preferred Options' stage and
instead embrace it within a broader requirement for appropriate public participation in
preparing a document for submission. There is also a revised Planning Policy
Statement 12 that amends and updates previous guidance. It is not anticipated that
these changes will impact on the substance of what is now before Members but may
have implications for presentation and processes. This will be reported more fully to
the following Cabinet when approval for consultation is sought.

The Proposals

It should be stressed that the LDF Core Strategy should not be limited to matters of
what would or would not gain planning permission. Rather it should focus on setting
a vision for places and identifying the components necessary to deliver that vision,
including how and where associated development and change will occur.

The first part of the document contains the vision and overall aims, essentially as
presented to Cabinet on 14th April 2008.

Spatial strategies and policy directions have been compiled for Bexhill and Hastings
fringes, Battle, Rye and the Villages. Thematic or cross-cutting strategies and policy
directions have been prepared covering Communities, the Environment, the
Economy, Transport and Accessibility and Implementation and Monitoring.

The context for the total scale of development is provided by the draft South East
Plan. This sets a total housing requirement for Rother of 5,400 dwellings, equivalent
to 280 dwellings/year. The Independent Panel of Inspectors did not recommend a
change to this figure, hence, it is assumed that it will remain at this level in the final
Plan. (The Government is due to publish its ‘modifications’ in July, so any changes
will be known by the time Cabinet approve the full document.)

A central theme of the document is how development can best meet the needs of the
District – for economic regeneration, affordable housing, conservation of its
environmental qualities, access to services and community facilities, etc. This is
addressed by looking closely at individual areas and settlements, as well as at the relationship between them.

The broad conclusions from the assessment process in terms of the longer-term strategy for the distribution of development essentially align with the current Local Plan, with growth and change at Bexhill continuing over time, more limited growth at Battle and Rye and only modest amounts of development at the villages. However, a somewhat greater dispersal of development across the villages is envisaged, following sustainability assessment and to better address local needs. It should also aid assimilation of change.

Consideration has been given to a greater scale of growth than the baseline requirement of the South East Plan, particularly at Bexhill, where environmental constraints are less than elsewhere (mainly due to AONB and nature conservation designations, and flood risk). However, while an option is highlighted, it is not currently favoured for economic, traffic, infrastructure, market and character reasons.

Furthermore, any significant development at Bexhill is dependent upon the construction of the Link Road. Indeed, without this, the town cannot fully fulfil its housing role, cannot provide the employment land needed to stimulate regeneration or affordable housing to help retain younger people, nor support schemes such as the Pebsham Countryside Park and more sustainable travel initiatives between Bexhill and Hastings. It is therefore central to the strategy.

Consideration still has to be given to a scenario where the Link Road is delayed or not progressed. Therefore, while this is not anticipated, and would certainly undermine the objectives for the town and sub-region, the potential for other locations to grow at a higher rate has been assessed. However, the constraints on other towns and the villages are such that this would not be sustainable. Therefore, it is concluded that the overall rate of development may be constrained depending on the timing of the Link Road and that this should be reflected in the strategy.

For both Battle and Rye, an indication is given of longer term scope and possible directions for development, although options are limited, particularly for Rye. There, the focus is as much on social and economic issues.

In terms of the cross-cutting themes, perhaps the main areas of debate relate to:
Affordable housing
Sustainable energy management
Gypsy and traveller provision

For each of these, options are put forward for wider consultation, partly as more work is needed to inform the policy direction.

Elsewhere, new policy directions propose a greater focus on design quality, a more pro-active approach to green space provision, highlight transport priorities and overall employment space targets.
Next Steps

Cabinet’s views are invited on the emerging proposals. Given their significance to the future of the District, it is recommended that they be referred to Council for the views of all Members to be reflected before final approval.

Anthony Leonard
Director of Services

Risk Assessment Statement
The Council has a legal obligation to prepare a LDF Core Strategy. Government encourage this to be progressed as expeditiously as possible. Delays in preparation may present difficulties in terms of alignment with Hastings LDF. However, care needs to be taken to ensure that policy directions are soundly based and stakeholder views taken into account before the document is submitted for Examination. The proposed consultation, when the full document is prepared, will meet this requirement.
Appendix 8 – Stakeholder consultation on synopsis (23rd June to 14th July 2008)

List of All Organisations / Persons Consulted
Rother Councillors

<table>
<thead>
<tr>
<th>Councillors Name</th>
<th>Ward</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bird, Roger Keith</td>
<td>Marsham</td>
</tr>
<tr>
<td>Carroll, James Joseph</td>
<td>Bexhill Sidley</td>
</tr>
<tr>
<td>Carroll, Richard Charles</td>
<td>Bexhill Sackville</td>
</tr>
<tr>
<td>Clark, Charles Albert</td>
<td>Bexhill St Michaels</td>
</tr>
<tr>
<td>Davies, Miss Angharad Elizabeth</td>
<td>Crowhurst</td>
</tr>
<tr>
<td>Dixon, Kevin Paul</td>
<td>Battle</td>
</tr>
<tr>
<td>Douart, Patrick Rene</td>
<td>Bexhill St Marks</td>
</tr>
<tr>
<td>Elliston, Robert Victor</td>
<td>Ticehurst &amp; Etchingham</td>
</tr>
<tr>
<td>Ensor, Michael David</td>
<td>Bexhill Central</td>
</tr>
<tr>
<td>Field, Kathryn Margaret</td>
<td>Battle</td>
</tr>
<tr>
<td>Forster, Martyn Sheridan</td>
<td>Bexhill St Michaels</td>
</tr>
<tr>
<td>Gadd, Mrs Joanne Patricia</td>
<td>Bexhill St Marks</td>
</tr>
<tr>
<td>Ganly, Anthony Edward</td>
<td>Ewhurst &amp; Sedlescombe</td>
</tr>
<tr>
<td>George, Mrs Bridget Ann</td>
<td>Bexhill St Stephens</td>
</tr>
<tr>
<td>Name</td>
<td>Constituency</td>
</tr>
<tr>
<td>--------------------------</td>
<td>--------------------</td>
</tr>
<tr>
<td>Hearn, George Edward Stanley</td>
<td>Salehurst</td>
</tr>
<tr>
<td>Holmes, Mrs Sonia Irene</td>
<td>Rye</td>
</tr>
<tr>
<td>Hughes, Mrs Joyce Muriel</td>
<td>Bexhill Central</td>
</tr>
<tr>
<td>Jenkins, Ian George Francis</td>
<td>Ticehurst &amp; Etchingham</td>
</tr>
<tr>
<td>Johnson, Jonathan Miller</td>
<td>Brede Valley</td>
</tr>
<tr>
<td>Kentfield, Brian</td>
<td>Bexhill Kewhurst</td>
</tr>
<tr>
<td>Kenward, Martin John</td>
<td>Bexhill Kewhurst</td>
</tr>
<tr>
<td>Lendon, Paul Graham</td>
<td>Bexhill St Stephens</td>
</tr>
<tr>
<td>Maynard, Carl Raymond</td>
<td>Brede Valley</td>
</tr>
<tr>
<td>Miers, Mrs Wendy Mary</td>
<td>Darwell</td>
</tr>
<tr>
<td>Mooney, Martin</td>
<td>Rother Levels</td>
</tr>
<tr>
<td>Osborne, Paul Norman</td>
<td>Eastern Rother</td>
</tr>
<tr>
<td>Patten, Robin Hugh</td>
<td>Marsham</td>
</tr>
<tr>
<td>Prochak, Mrs Susan Myfanwy</td>
<td>Salehurst</td>
</tr>
<tr>
<td>Ramus, Charles Nicholas</td>
<td>Eastern Rother</td>
</tr>
<tr>
<td>Russell, David Whitney Erskine</td>
<td>Rye</td>
</tr>
<tr>
<td>Name</td>
<td>Location</td>
</tr>
<tr>
<td>-------------------------------------------</td>
<td>---------------------------------</td>
</tr>
<tr>
<td>Starnes, Christopher Francis</td>
<td>Bexhill Collington</td>
</tr>
<tr>
<td>Vereker, David William Leslie Medlicott</td>
<td>Darwell</td>
</tr>
<tr>
<td>Wheeler, Ms Gillian Patricia</td>
<td>Bexhill Collington</td>
</tr>
<tr>
<td>Wheeler, Robert</td>
<td>Bexhill Sidley</td>
</tr>
<tr>
<td>Williams, Mrs Deirdre Celia</td>
<td>Bexhill Sackville</td>
</tr>
<tr>
<td>Winterborn, Mrs Frances Mclaren</td>
<td>Bexhill Old Town</td>
</tr>
<tr>
<td>Wood, James Stuart</td>
<td>Bexhill Old Town</td>
</tr>
</tbody>
</table>
## Delivery Bodies and Agencies

<table>
<thead>
<tr>
<th>Organisations</th>
<th>Contact/Persons</th>
</tr>
</thead>
<tbody>
<tr>
<td>East Sussex County Council</td>
<td>Waste, Tony Cooke</td>
</tr>
<tr>
<td>East Sussex County Council</td>
<td>Senior Planner (Nick Claxton)</td>
</tr>
<tr>
<td>East Sussex County Council</td>
<td>Peter Haywood (Transport)</td>
</tr>
<tr>
<td>East Sussex County Council</td>
<td>Tony Blackman (Education)</td>
</tr>
<tr>
<td>East Sussex County Council</td>
<td>Jenny Tuck (Housing)</td>
</tr>
<tr>
<td>EDF Energy</td>
<td>Commercial Strategy Manager, Mr J. Park</td>
</tr>
<tr>
<td>Environment Agency</td>
<td>Planning Liaison Team Leader, Kate Entwistle</td>
</tr>
<tr>
<td>Fire and Rescue Service</td>
<td>Senior Planner, Rudolf Van Wyk</td>
</tr>
<tr>
<td>Hastings Borough Council</td>
<td>Policy Manager, Jane Jackson</td>
</tr>
<tr>
<td>Highways Agency</td>
<td>Network Manager for South East, Mr P. Minshull</td>
</tr>
<tr>
<td>Hastings &amp; Rother PCT</td>
<td>Chief Executive, Vanessa Carnes</td>
</tr>
<tr>
<td>High Weald AONB Unit</td>
<td>Policy Manager, Mr A. Shaw</td>
</tr>
<tr>
<td>Locate East Sussex</td>
<td>Mr M Cogswell</td>
</tr>
<tr>
<td>Learning and Skills Council</td>
<td>Mr P. Stoggles</td>
</tr>
<tr>
<td>National Grid Transco</td>
<td>Planner, Mr J.Hobbs</td>
</tr>
<tr>
<td>Network Rail</td>
<td>Town Planner, Mr C. Price</td>
</tr>
<tr>
<td>Romney Marshes Internal Drainage Board</td>
<td>Clerk to the Board, Mr I.D. Oliver</td>
</tr>
<tr>
<td>Sea Space</td>
<td>Mr P. Adams</td>
</tr>
<tr>
<td>South East Water Ltd</td>
<td>Infrastructure Development Manager, Mr G Webb</td>
</tr>
<tr>
<td>Southern Water</td>
<td>Planning Analyst, Ms S. Solbra</td>
</tr>
<tr>
<td>Stagecoach Coastline Buses</td>
<td>The Manager, Ms R. Blair</td>
</tr>
<tr>
<td>Sussex Police</td>
<td>Crime Prevention Design Advisor, Mr M. Garrad</td>
</tr>
</tbody>
</table>
### Town & Parish Councils

<table>
<thead>
<tr>
<th>Town &amp; Parish</th>
<th>Contact name (Clerk)</th>
</tr>
</thead>
<tbody>
<tr>
<td>ASHBURNHAM AND PENHURST</td>
<td>Mr A Wooding Jones</td>
</tr>
<tr>
<td>BATTLE</td>
<td>Mr P Mills</td>
</tr>
<tr>
<td>Including Parish Wards of Battle, Netherfield &amp; Telham</td>
<td></td>
</tr>
<tr>
<td>BECKLEY</td>
<td>Mrs H Lambert</td>
</tr>
<tr>
<td>BODIAM</td>
<td>Mrs H Lewis</td>
</tr>
<tr>
<td>BREDE</td>
<td>Mrs L Bannister</td>
</tr>
<tr>
<td>Including Broad Oak</td>
<td></td>
</tr>
<tr>
<td>BRIGHTLING</td>
<td>Mr D G Phillips</td>
</tr>
<tr>
<td>BURWASH</td>
<td>Mrs M Hayes</td>
</tr>
<tr>
<td>Including Burwash Weald</td>
<td></td>
</tr>
<tr>
<td>CAMBER</td>
<td>Mrs P A Thresher (Acting)</td>
</tr>
<tr>
<td>CATSFIELD</td>
<td>Mrs C Hodgson</td>
</tr>
<tr>
<td>CROWHURST</td>
<td>Mrs P Buckle</td>
</tr>
<tr>
<td>DALLINGTON</td>
<td>Mrs J A Hyner</td>
</tr>
<tr>
<td>ETCHINGHAM</td>
<td>Ms M Chew</td>
</tr>
<tr>
<td>EWHURST including Staplecross</td>
<td>Mr R Farhall</td>
</tr>
<tr>
<td>FAIRLIGHT</td>
<td>Mr R Tice</td>
</tr>
<tr>
<td>GUESTLING</td>
<td>Councillor P Brown (Acting)</td>
</tr>
<tr>
<td>Including Three Oaks</td>
<td></td>
</tr>
<tr>
<td>HURST GREEN</td>
<td>Miss J Ellis</td>
</tr>
<tr>
<td>ICKLESHAM</td>
<td>Mr D Rosewell</td>
</tr>
<tr>
<td>Including Parish Wards of Icklesham, Winchelsea, Winchelsea Beach &amp; Rye Harbour.</td>
<td></td>
</tr>
<tr>
<td>IDEN</td>
<td>Mrs M J Moule</td>
</tr>
<tr>
<td>MOUNTFIELD</td>
<td>Mrs N M Keeler</td>
</tr>
<tr>
<td>NORTHIAM</td>
<td>Mrs S Keighley</td>
</tr>
<tr>
<td>PEASMARSH</td>
<td>Mr R Thompson (Acting)</td>
</tr>
<tr>
<td>RYE</td>
<td>Mr R Farhall (Town Clerk)</td>
</tr>
<tr>
<td>Parish</td>
<td>Representative</td>
</tr>
<tr>
<td>------------------------------</td>
<td>-------------------------</td>
</tr>
<tr>
<td>RYE FOREIGN</td>
<td>Mrs J D M Ramus</td>
</tr>
<tr>
<td>SALEHURST AND ROBERTSBRIDGE</td>
<td>Mrs K Ripley</td>
</tr>
<tr>
<td>SEDLESCOMBE</td>
<td>Mrs P Raymond</td>
</tr>
<tr>
<td>TICEHURST including Parish Wards of Flimwell, Stonegate &amp; Ticehurst</td>
<td>Mrs F Nowne</td>
</tr>
<tr>
<td>UDIMORE</td>
<td>Mrs N Florence-Marshall</td>
</tr>
<tr>
<td>WESTFIELD including Parish Wards of Kent Street, Westfield &amp; Westfield Lane</td>
<td>Mrs B Balkham</td>
</tr>
<tr>
<td>WHATLINGTON (Parish Meeting)</td>
<td>Mrs V Bennett</td>
</tr>
<tr>
<td>EAST GULDEFORD</td>
<td>Mrs C Regendanz-Cooke</td>
</tr>
</tbody>
</table>
## Appendix 9 – Summary of responses to Core Strategy Synopsis Document

### Stakeholder Comments

<table>
<thead>
<tr>
<th>Name</th>
<th>Summary of Comments</th>
<th>Officer Response</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Rother Councillors</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Councillor Miss A.E. Davies</td>
<td>Too much development in Battle, where main priorities are sustainability and conservation One primary school best; Claverham College needs rebuilding; need swimming pool; leisure facilities and jobs for young people Scope in Netherfield Keep a “characterful” gap between Battle and Hastings Agree with strategy for Bexhill Too heavy housing at Wilting will be seriously detrimental to gap to Crowhurst Rye needs “massive help” with jobs, transport links; conservation important For rural areas, conservation, jobs and services and transport highlighted, with potential for minibuses/taxis Promote farming More emphasis on care of the countryside Avoid greenfield land</td>
<td>See main report re. scale of development at Battle. Leisure facilities will be informed by the Study (audit and assessment) of Open Space, Sport and recreation in Rother District. Netherfield is being addressed in the Rural Settlement Study. It is proposed to maintain a strategic gap between Hastings and Battle. Its boundaries will be re-assessed. Public transport provision will be discussed with East Sussex County Council. Other points are noted</td>
</tr>
<tr>
<td>Councillor Kevin Dixon</td>
<td>5 spatial development options don’t take account of land available and whether infrastructure and services can cope. Battle &amp; Rye have severe infrastructure issues and no</td>
<td>Options are intentionally ‘broad-brush’. Caveats are included that all options are pending further detailed investigation.</td>
</tr>
</tbody>
</table>
Question deliverability 'on the ground'
Why is Breadsell Farm (Hastings Fringes) counted in Bexhill’s rather than Battle’s allocation?
Protect strategic gap (both at Battle and at Hastings fringes)
Battle gridlocked – wish to see section of A2100 reclassified as B road.
Question what other junction improvements can be provided.
Welcome recognition of need for more town centre parking.
Park & Ride station at Wilting is essential. Local Development Framework must commit to this.
LDF should be more supportive on rail transport, including need for station at Glyne Gap.
Retail: No space for small food supermarket in town. Out of town would attract car movements and divide town’s retail offering.
Welcome employment opportunities, particularly in tourism. Need to acknowledge Battle Tourism Group and 1066 Country Campaign as well as English Heritage.
Villages: Many villages with reasonable services excluded from development (Pett, Staplecross). More for Netherfield. More consideration to small developments in villages should be done.

Councillor Mrs Field
Agree with aims to reduce journeys and preserve gaps between settlements;
Erosion of gap between Battle and Hastings is

and education issues at Battle.
It is proposed to maintain a strategic gap between Hastings and Battle. Its boundaries will be reassessed.
Other points are noted.
**HOW TO RESPOND**

Unacceptable
Concern that no development at some service centres does not support their communities
Reduction in cross-town traffic at Battle should be balanced with encouraging use of town centre facilities
Acknowledge home shopping, support use of local shops
Some items are outside Rother District Council control
Martins Oak surgery is well located

Martins Oak – The Primary Care Trust has advised that they should work with the practice and the local authority to identify a new site and allow a smooth transition to new purpose built premises, potentially to include a new or re-located pharmacy.

Other points are notes

<table>
<thead>
<tr>
<th>Cllr Tony Ganley</th>
<th>Minor amendments regarding Sedlescome and Ewhurst</th>
<th>Noted</th>
</tr>
</thead>
</table>
| Councillor Ian Jenkins | Agrees focus on towns
Not lose sight of transport ‘needs of northern areas
Highlights flooding in part of Etchingham
Need to take account of climate change | Additions to be made highlighting flood issue in Etchingham and on Ticehurst Square Conservation Area in background paper. |

| Councillor David Vereker | Presentation can be improved
Be clearer on new sites/dwellings to be identified
Questions short time for comment – need to get right
Emphasise reliance on Link Road – not re-allocate
Questions capacity of service villages and potential community benefits of housing in smaller villages
Need to appreciate that developer contributions will be limited for small developments
No regard to economic slowdown
Should not risk housing delivery for some more affordable dwellings
Be realistic about car use and bus financing
Consider a new or amalgamated village
Employment needs more research | Presentation, period for comment, reliance on Link Road, employment aspects are all covered in main report.
Options for affordable housing levels and distribution of development options will be in consultation document with opportunity for people to comment on them.
Scale of development and locational factors do not favour a new/expanded settlement. |

Other points are noted.
<table>
<thead>
<tr>
<th>Delivery Bodies and Agencies</th>
<th>Be concise; use background papers as much as possible</th>
<th>Noted</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Add context section with portrait/links to other strategies</td>
<td>This is proposed.</td>
</tr>
<tr>
<td></td>
<td>Make vision locally distinctive</td>
<td>Amend Vision to incorporate places</td>
</tr>
<tr>
<td></td>
<td>Make indicators and targets locally distinctive</td>
<td>Amend where appropriate</td>
</tr>
<tr>
<td></td>
<td>Add distribution of employment and retail development</td>
<td>Agree – to be drawn from recently completed evidence studies</td>
</tr>
<tr>
<td></td>
<td>Existing allocations should be tested against options</td>
<td>This will be part of the Sustainability Appraisal</td>
</tr>
<tr>
<td></td>
<td>Be clear on strategic sites allocated through Core Strategy</td>
<td>Apart from North East Bexhill, only broad locations are identified</td>
</tr>
<tr>
<td></td>
<td>Be clear on any phasing of delivery (i.e. when?)</td>
<td>A Phasing ‘profile’ will be added as part of the Implementation section</td>
</tr>
<tr>
<td></td>
<td>Need more detail of level of retail development</td>
<td>This can be added, now Study complete</td>
</tr>
<tr>
<td></td>
<td>Consider infrastructure within place-making sections</td>
<td>To be highlighted where appropriate</td>
</tr>
<tr>
<td></td>
<td>Will need to demonstrate commitment to provide infrastructure as Strategy develops</td>
<td>There will be ongoing involvement of delivery agencies</td>
</tr>
<tr>
<td></td>
<td>Word policies in a clear way</td>
<td>Noted</td>
</tr>
<tr>
<td></td>
<td>Be clear on approach if Bexhill &amp; Hastings Link Road not built/delayed – have contingency</td>
<td>To be clarified, although this shows limitations in re-allocating elsewhere – see main report</td>
</tr>
<tr>
<td></td>
<td>Development Control policies may be in a separate chapter, but still keep the Core Strategy as a strategic document</td>
<td>Key development (control) policies are regarded as best placed in the most relevant section</td>
</tr>
<tr>
<td></td>
<td>Clarify approach to housing mix</td>
<td>To be amended</td>
</tr>
<tr>
<td></td>
<td>Cross refer to SA</td>
<td>This is proposed</td>
</tr>
<tr>
<td>East Sussex County Council (County Archaeologist)</td>
<td>Need a more comprehensive evidence base for historic environment so issue can underpin all LDF strands, including social and economic. Want Policy direction to promote closer working with historic environmental professionals Need ‘Historic Environment Characterisation’</td>
<td>Noted.</td>
</tr>
<tr>
<td>East Sussex County Council (Children’s Services)</td>
<td>Welcome emphasis on raising educational attainment and investment. Limitations to any pupil number forecasts. Refer to government funded education programmes Welcome new housing in rural areas. Spatial Development Options: Support option 1 as provides largest quantum of housing in rural villages, thus helping to sustain rural schools. Battle: development proposed will result in need for expanded primary and secondary provision, but not enough for new primary school. Many more detailed and geographically specific points.</td>
<td>General points noted. Education position at battle is considered in main report. More detail on schools places added as rural context.</td>
</tr>
<tr>
<td>East Sussex County Council, Planning &amp; Environment</td>
<td>Comments on Aims &amp; Development principles Infrastructure, particularly the timing of development, as such, does not fall within the infrastructure theme. General amendments and clarifications Bexhill: more reference to the forthcoming Master Plan SPD.&quot; Battle: 550 dwellings in Battle over the plan period.&quot;, would not be sufficient to justify the provision of a new primary school in Battle. Rural areas: Reinforce the infrastructure theme General amendments and clarifications Transport and accessibility: General amendments and clarifications</td>
<td>More detail on infrastructure to be added Battle – see main report Other points are noted.</td>
</tr>
<tr>
<td>Clarifications</td>
<td>East Sussex County Council Strategy and Commissioning Unit</td>
<td>Hastings Borough Council (Borough Planning Officer)</td>
</tr>
<tr>
<td>----------------</td>
<td>----------------------------------------------------------</td>
<td>-----------------------------------------------------</td>
</tr>
<tr>
<td>Implementation strategy: give a clearly indicate that the infrastructure theme will be fleshed out through SPD and that this will be done in a timely manner. To properly reflect paras 5.90 to 5.93 of the SEP EIP Panel report.</td>
<td>Aims to support older people to live independently not followed through in the Strategy to make this happen. Suggest replacing Preferred policy direction for older people (page 46) with a clear strategic aim from the Rother Locality Housing and Support Strategy (which is referenced elsewhere in the document) - improve and increase the range of housing options for older people with care and support needs. No mention of supported housing for vulnerable adult groups (i.e non older people).</td>
<td>Support for: Local Area aims; overall development strategy (but clarify (d)); shared vision for Hastings and Bexhill; aim for Bexhill; facilitating strategic release at Breadsell; partnership approach to gypsy sites; strategic accessibility emphasis; Question need to refer to housing backlog Need to indicate housing distribution if Link Road delayed Question scale of retail growth in Bexhill, and distribution of retail and employment development across district Clarify where further allocations are planned in Bexhill Wilting area may be more positive in its potential to support regeneration and transport interchange. Need Welcome areas of support, (but clarify that partnership working relates to transit gipsy sites) Accept that South east plan Changes do not provide for housing backlog, and amend text accordingly. Retail to be added on completion of retail and employment land studies An Inset Diagram is proposed Other points are noted.</td>
</tr>
<tr>
<td>Entity</td>
<td>Comments</td>
<td></td>
</tr>
<tr>
<td>--------</td>
<td>----------</td>
<td></td>
</tr>
<tr>
<td>LSC South East Region (Mr. P. Stoggles)</td>
<td>Support Shared Vision; strategy for Bexhill; Economic strategy; tourism strategy Add support to maximising benefit of University Centre Hastings</td>
<td></td>
</tr>
<tr>
<td>Seaspace - Paul Adams</td>
<td>Support service centres based distribution strategy; emphasis on economic regeneration and growth in Bexhill and Hastings; highlighting growth dependence on Link Road; ‘shared vision for H &amp; B; Bexhill policy direction; Wilting development potential (seek to work with LAs to explore further) Should enable flexibility on scale of growth, within a sound relationship between economy, housing and infrastructure Be clearer on role of Bexhill town centre Elaborate on Bexhill seafront opportunities</td>
<td></td>
</tr>
<tr>
<td>Utilities and Agencies</td>
<td>Reference to land contamination?</td>
<td></td>
</tr>
<tr>
<td>Environment Agency (Lawrence Hamer, Groundwater &amp; Contaminated Land)</td>
<td>To be addressed as a development criterion</td>
<td></td>
</tr>
<tr>
<td>Environment Agency (Kate Entwistle, Planning Liaison Team Leader)</td>
<td>Policies will be informed by the Local Strategic Flood Risk Assessment (SFRA) Other points are noted.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Need to consider flood risk</td>
<td></td>
</tr>
<tr>
<td>------------------------------</td>
<td>----------------------------</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Need to consider infrastructure requirements</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Potential for resource efficiency for developments</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Issues identified under environment theme</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Policy direction to identify opportunities for green networks</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Option 2 in policy options for sustainable resource management</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Ensure Strategic Flood Risk Assessment (SFRA) is in accordance with environment Agency (EA) strategies, and is locally distinctive.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Do current policies on flooding add anything to PPS25.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Department</th>
<th>Action/intervention</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fire &amp; Rescue Service, Senior Planner</td>
<td>Re. North East Bexhill:</td>
</tr>
<tr>
<td></td>
<td>In the event that the link road is not built they have serious concerns about their ability to respond to this location.</td>
</tr>
<tr>
<td></td>
<td>Depending on the type of occupancy, request the Local Planning Authority to consider domestic sprinkler systems at each property at NE Bexhill, being conditioned as part of the approval.</td>
</tr>
<tr>
<td></td>
<td>Rural sites: request that ALL new developments in rural locations are required to install domestic sprinkler systems.</td>
</tr>
<tr>
<td></td>
<td>Noted. Ongoing communications with RDC Building Control.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Department</th>
<th>Action/intervention</th>
</tr>
</thead>
<tbody>
<tr>
<td>Highways Agency (Peter Minshull)</td>
<td>Highlight that schemes are subject to current review and priorities may change; hence need to consider implications of delays and not be “over-reliant on them</td>
</tr>
<tr>
<td></td>
<td>Refer to accessibility by non-car modes in overall development strategy</td>
</tr>
<tr>
<td></td>
<td>Should not be ‘over-reliant on delivery of Link Road or Baldslow Improvements</td>
</tr>
<tr>
<td></td>
<td>Noted. See main report re: contingencies.</td>
</tr>
<tr>
<td></td>
<td>Had further discussions, including on scale of development close to trunk roads.</td>
</tr>
<tr>
<td>Network Rail, Town Planning</td>
<td>Consultation on the Kent Route Utilisation Strategy will be undertaken this winter. Work in formulating the document will consider the feasibility of the new stations at Glyne Gap and Wilting and the Willington Chord rail link.</td>
</tr>
<tr>
<td>Registered Social Landlord Development Forum</td>
<td>Verbal comments: Policy for higher proportion of affordable housing on some sites may be difficult to enforce would need backing up by solid evidence of need.</td>
</tr>
<tr>
<td><strong>Stage Coach Bus (Jeremy Cooper)</strong></td>
<td>No action points for improving local access using local transport, in contrast to clear action for regional access. Should be aspiration to site all new developments within 500 m of existing bus routes. Need for additional parking restrictions along bus routes. No comment about buses in subsidiary centres. Concern over reference to removing vehicles from historic Rye. General comment – this is an important opportunity for synergy between transport and development.</td>
</tr>
<tr>
<td><strong>Sussex Police</strong></td>
<td>Support detail on crime Note need to cover police resources in S106 guidance</td>
</tr>
<tr>
<td><strong>Town &amp; Parish Councils</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Battle Town Council (Peter Mills, Town Clerk)</strong></td>
<td>Support continuation of Local Plan policies, esp. those designed to protect and enhance the environment, ensure supporting infrastructure and ensure affordable housing targets are achieved. Support new station at Wilting Question basis for saying new leisure centre required in Battle, but suggest Blackfriars area could be suitable. Concern that development will impact on AONB. Feel that Battle has taken its ‘fair share’. Need to reduce congestion, particularly that caused by In 2007 PMP prepared a Study (audit and assessment) of Open Space, Sport and recreation in Rother District. The Council adopted the Study to, inter alia, inform the preparation of the Local Development Framework and the implementation of Local Plan Policy CF3 in accordance with PPG17. Scale of development at Battle – see main report</td>
</tr>
<tr>
<td>Location</td>
<td>Comments</td>
</tr>
<tr>
<td>-------------------</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Bodiam PC</td>
<td>Housing should be of size to facilitate family life. Top class communications technology should be in plan from outset for business and leisure.</td>
</tr>
<tr>
<td>Dallington PC</td>
<td>Require clarification over scope of Rural Settlement Study and definition of ‘villages’ and ‘settlements’ vis-à-vis ‘parishes’.</td>
</tr>
<tr>
<td>Iden PC</td>
<td>Contingency for Link Road?</td>
</tr>
<tr>
<td>Northiam PC</td>
<td>Tight deadline! Need to plan sensitively in AONB</td>
</tr>
<tr>
<td>Peasmarsh PC</td>
<td>Concern over timescales Doubt evidence of housing need for Peasmarsh Concern over foul water disposal</td>
</tr>
<tr>
<td>Rye Foreign PC</td>
<td>Why Rye Foreign not included – has a population of over 100? + 2 pubs and doctors surgery Leasam Lane included?</td>
</tr>
<tr>
<td>Salehurst &amp; Robertsbridge</td>
<td>Concern over timescales</td>
</tr>
</tbody>
</table>
| PC                                    | Strategy driven by central government  
|                                       | Loss of local shops and business – why?  
|                                       | Question assumption that more housing will mean more support for local business.  
|                                       | Argue for policy preventing change of use from commercial to residential  
|                                       | Need for affordable, rather than market housing  
|                                       | Concern over R’bridge conclusions re: open space needs  
|                                       | Confusion over Parish/Village/settlement focus  
|                                       | Minor points, amendments and Typos  
|                                       | Timescale noted – see main report  
|                                       | More context on shops and business to be added to rural sections  
|                                       | Policy to retain commercial premises proposed.  
|                                       | Other points are noted.  

|                                       | School is full  
|                                       | Lack of housing is not mentioned by parish respondents and Sedlescombe doesn't want more affordable housing  
|                                       | Support retention of employment but don’t want more. Difficult to see where doctors surgery could go  
|                                       | Minor points, amendments and Typos  
|                                       | Clarification of approach, especially to smaller settlements to be addressed via new sections in Rural Settlement Study and Core Strategy – see main report.  
|                                       | Additional liaison with ESCC education regarding school capacity is to be undertaken  
|                                       | Sedlescombe housing figure to be reviewed.  
|                                       | Other points are noted.  

| Westfield PC                         | Confusion over Parish/Village/Settlement focus  
|                                       | Pleased to see use being made of Westfield LAP  
|                                       | To be addressed via new sections in RSS and Core Strategy – see main report.  

## Appendix 10 - Summary of issues arising from Core Strategy representations

<table>
<thead>
<tr>
<th>ISSUE AREA</th>
<th>DIRECTION SOUGHT</th>
<th>ACTION REQUIRED</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>CHAPTER 1 Introduction</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Impact of economic recession</td>
<td>Highlight impact on strategy and need to ensure deliverability</td>
<td>Review currency of strategy and refer to economic/housing market recovery forecasts/projections</td>
</tr>
<tr>
<td><strong>CHAPTER 2 Spatial Portrait</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Effects of greater home working on villages as well as individuals</td>
<td>Set out more comprehensively</td>
<td>Present information (Rother has highest home working % in SE) Pick up in Rural Areas section</td>
</tr>
<tr>
<td>Urgent environmental challenges</td>
<td>List challenges (on Page 8, paragraph 2.8)</td>
<td>Expressly consider uncertainty of energy supply, food security, waste and recycling, water shortages</td>
</tr>
<tr>
<td>Needs of predominantly retired and aging population</td>
<td>Identify needs – key issue</td>
<td>Review needs of predominantly retired population via update of the SMHA. Develop the ‘Older people’ strategy in ‘Communities’</td>
</tr>
<tr>
<td>Need for more social housing</td>
<td>Identify housing need as this is a key issue</td>
<td>Quantify need for social housing from Housing Needs Survey. (Highlighted in Vision)</td>
</tr>
<tr>
<td>Investment and job creation</td>
<td>Need for more statistics reflecting regeneration area priorities</td>
<td>Address, drawing on SEERA and local indicators (Highlighted in Policy Context and Vision)</td>
</tr>
<tr>
<td><strong>CHAPTER 3 Vision for the Future</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Development of the vision</td>
<td>Be responsive to Parish Councils</td>
<td>Ensure continuing engagement with Parish Councils</td>
</tr>
<tr>
<td><strong>Tourism potential</strong></td>
<td>Need more for tourism potential (+ policies won’t deliver)</td>
<td>See Tourism actions in ‘Economy’ section; SA policies against vision</td>
</tr>
<tr>
<td>-----------------------</td>
<td>----------------------------------------------------------</td>
<td>---------------------------------------------------------------------</td>
</tr>
<tr>
<td><strong>Sub-areas</strong></td>
<td>Identify Sussex Coast sub-region and benefits of priority for investment</td>
<td>Consider if a spatial unit (LSP?)</td>
</tr>
<tr>
<td></td>
<td>Refer to the High Weald area</td>
<td>Review wording of vision. Consider if a spatial unit (LSP?)</td>
</tr>
<tr>
<td></td>
<td>Align with role of SeaSpace re: Hastings/Bexhill area</td>
<td>Highlight ‘Five Point Plan’ and Implementation role. Liaise.</td>
</tr>
<tr>
<td><strong>Housing needs</strong></td>
<td>Specifically refer to meeting housing needs/requirements</td>
<td>Consider if Vision or Strategy (in GOSE/PINS eyes)</td>
</tr>
<tr>
<td><strong>Development</strong></td>
<td>Scale and distribution of housing direction – different perspectives</td>
<td>Consider if the Vision needs to say more about the scale and distribution of development and jobs over 20 years</td>
</tr>
<tr>
<td></td>
<td>Refer to protection of undeveloped coast</td>
<td>Cover in ‘Environment’ section.</td>
</tr>
<tr>
<td><strong>Economy</strong></td>
<td>Allude to “step change” in economic performance and business infrastructure in line with sub-regional strategy</td>
<td>Review clarity of (realistic) regeneration element of Vision; highlight elaboration in ‘Economy’ section.</td>
</tr>
<tr>
<td></td>
<td>Add need for education and training facilities, and links to economy</td>
<td>East Sussex emphasis, via LSP. Review with providers.</td>
</tr>
<tr>
<td><strong>Lifestyles</strong></td>
<td>Encourage self-sufficiency and “healthy lifestyles” and the contribution to flood risk, food supply, energy costs resilience</td>
<td>Emphasise “sustainable” development and communities.</td>
</tr>
<tr>
<td><strong>Transport</strong></td>
<td>More emphasis on improving connectivity</td>
<td>Set out realistic improvements drawing on</td>
</tr>
<tr>
<td>CHAPTER 4 Policy Context</td>
<td></td>
<td></td>
</tr>
<tr>
<td>--------------------------</td>
<td>--</td>
<td></td>
</tr>
<tr>
<td><strong>PPS4 and PPS6</strong></td>
<td>PPS4 review is supportive of economic activity and business, rural or not. Add latest position on combined PPS4/6 (NB Check latest position re Coastal Change and other emerging PPSs)</td>
<td></td>
</tr>
<tr>
<td><strong>South East Plan – housing minima</strong></td>
<td>Need clarity on the circumstances and criteria that will be applied to guide development proposals that go beyond housing figures identified in SE Plan SE Plan ‘minima’ removed, but need to provide for contingencies (as well as consider if we need to further justify housing target?)</td>
<td></td>
</tr>
<tr>
<td><strong>Joint Working initiatives</strong></td>
<td>Greater reference to joint working and objectives of the Task Force Liaise with SeaSpace and others. Add references.</td>
<td></td>
</tr>
<tr>
<td><strong>Sub-Regional Policy</strong></td>
<td>Clearer section on the sub-region Update SE Plan references</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>CHAPTER 5 Overall Spatial Development Strategy</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Aim and objectives (Box 2)</strong></td>
<td>Refer to need for affordable housing specifically Concern should be addressed if thematic (strategic) objectives first. Otherwise, elaborate vis-à-vis sustainable communities</td>
</tr>
<tr>
<td><strong>Are the objectives and strategy flexible to accommodate South East Plan reviews (and more housing)</strong></td>
<td>PINS? Test of soundness, but no basis for estimating future requirements, nor requirement to look beyond 15 years.</td>
</tr>
<tr>
<td><strong>Preferred Strategy (Box 3)</strong></td>
<td>Relate to employment potential, including for offices Consider if able to give jobs targets?</td>
</tr>
<tr>
<td><strong>Link Road delivery and contingencies (Box 4)</strong></td>
<td>Allocate reserve sites</td>
</tr>
<tr>
<td>Add other strategic locational factors, such as flood risk, energy potential, local character</td>
<td>Review overlap with other strategies</td>
</tr>
<tr>
<td>AONB environmental imperative needs highlighting</td>
<td>See earlier</td>
</tr>
<tr>
<td>More spatial detail</td>
<td>Cross reference to later sections?</td>
</tr>
</tbody>
</table>

**Development locations (Box 6)**
- Add need for economic regeneration, meeting recreational deficiencies, coastal erosion and viability

**General text - strategy**
- Indicate split between Sussex Coast/Rest of Rother for village housing numbers in table at 5.36 – and more in villages
- Review.
- Relate employment floorspace to SEEDA’s jobs target for the sub-region, and at the town level
- Discuss with SEEDA/ESCC

**Strategy options could be**
- Option 4 to 2011, then Option 2, or hybrid of Options 2 and 3; other options
- Sensitivity testing?

**Identify the hierarchy of retail centres**
- Consider in context of RPS6 (paragraph 2.9)
**CHAPTER 6 Bexhill and Hastings Fringes**

<table>
<thead>
<tr>
<th><strong>Retail Provision Bexhill</strong></th>
<th>Placement of large retail units/vitality of town centre commercial core</th>
<th>Further examination of deliverability (proving difficult)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Town Centre</strong></td>
<td>More cohesive town centre strategy</td>
<td>Clarify town centre strategy. Need to plan for contraction?</td>
</tr>
<tr>
<td></td>
<td>Car-parking, speed limits</td>
<td>Liaise with ESCC</td>
</tr>
<tr>
<td><strong>Housing Development/Sites</strong></td>
<td>Development land west of Bexhill favoured – new landowner/developer.</td>
<td>Further examination ongoing. Appropriate Assessment on Pevensey Levels Ramsar site</td>
</tr>
<tr>
<td></td>
<td>Soundness of Greenfield housing allocations in relation to PPS3 and PPS12 (in relation to North Bexhill/Link Road)</td>
<td>Examination of sites and phasing of delivery w.r.t. PPSs.</td>
</tr>
<tr>
<td></td>
<td>Clarification on scale of strategic site development</td>
<td>Review of housing numbers for Bexhill in relation to RSS</td>
</tr>
<tr>
<td><strong>Transport</strong></td>
<td>Traffic impact associated with alternative west Bexhill development</td>
<td>Review Traffic impact assessment</td>
</tr>
<tr>
<td></td>
<td>Sustainable transport elements, including seafront cycle links</td>
<td>Liaise with ESCC on Transport Assessments for Link Road/wider transport strategy –add LATS findings</td>
</tr>
<tr>
<td><strong>Wilton</strong></td>
<td>More housing needed to</td>
<td>Further work on feasibility</td>
</tr>
</tbody>
</table>
support station. Limited landscape capacity. Impact on Crowhurst Station

of station. Traffic impacts

Wilting/Breadsell
Impact on Marline Valley, Combe Haven and ancient woodland
Bio-diversity work led by HBC, and liaison with NE.

CHAPTER 7 Battle

Strategy
Indicate broad development only. Detailed policies in SPD.
Re-examine wording of strategy

Battle merits its own inset diagram (annotated)

Consider all sites on periphery, not just certain sectors

Retail
Space for new supermarket limited; loss of character
Site investigation

Transport and Car Parking
Parking capacity issue
Strategic?

Employment
Where and what type of employment is required
Investigate for type and location

CHAPTER 8 Rye and Rye Harbour

Retail Development
Indicate nature of impact of a large new supermarket on character of high street and local economy.
Issue splits community
Review retail assessment for Rye considering:
- Evidence for floorspace requirements
- Impact on local small businesses and local economy
- Impact on traffic
- Location options
- Impact on citadel – facilities and character

Housing Development
Scale of housing growth
Audit trail of view that Rye
### Transport

- Traffic management strategy to protect the historic core
- Investment in rail transport and dual tracking and electrifying the line?
- Future AAP or SPD?
- Clarity on rail position – info from review of Rail Utilisation Strategy Consultation Draft

### Sites

- Prospects for existing allocations?
- Comprehensive understanding of old schools sites potential for redevelopment – public consultation required?
- Identification of any strategic sites?
- Rye Harbour Road strategy
- Sites work to feed in and strategy prepared for old schools sites and other public owned sites – particularly any derelict in Citadel
- Determine the need to designate any strategic sites – PINS: what is strategic?
- NE position on SSSI (or not)?

### Employment / Commercial Development

- Contaminated land at Rye Harbour Road
- Identify any investment opportunities (sign-up) for Port of Rye
- Impact of access to Ashford?
- Check contaminated land policy with RDC and EA
- See SSSI issue above

### Cultural Facilities

- Investigate potential/ opportunities for a new major cultural facility, new community facility in Tilling Green, new Library
- Sites assessment work to feed in to identification of opportunities for cultural centre. Lisise with ESCC.

### Flood Risk

- Strategy for flood risk for
- Liaise with the EA about
<table>
<thead>
<tr>
<th><strong>Rye Harbour + employment area along RH Road</strong></th>
<th><strong>appropach to Rye Harbour and RH Road – key issue</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Biodiversity</strong></td>
<td><strong>Priority habitats recognition</strong></td>
</tr>
<tr>
<td></td>
<td><strong>Development impact on Natura 200 sites</strong></td>
</tr>
<tr>
<td><strong>Tourism</strong></td>
<td><strong>Develop the (green) tourism strategy</strong></td>
</tr>
<tr>
<td></td>
<td><strong>Develop the green tourism strategy – liaise</strong></td>
</tr>
</tbody>
</table>

**CHAPTER 9 Rural Areas**

<table>
<thead>
<tr>
<th><strong>Service Centre approach</strong></th>
<th><strong>Should state that housing and employment growth will be supported in villages, particularly those which have services and existing transport infrastructure. Also, there is too much deviation from service centre approach in allowing some growth at smaller villages.</strong></th>
<th><strong>Complete SHLAA to inform development potential within each settlement. Review distribution accordingly – particularly in villages where development is meeting perceived local need rather than as a result of the presence of services (eg Brightling). Discuss with housing issue of exception sites vis-à-vis allocations predominantly for affordable housing. Examine need for greater clarity regarding importance of accessibility in deciding growth.</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Housing Numbers</strong></td>
<td><strong>Does not comply with SCT5 of SE Plan – not supported by clear justification that a lower housing requirement is necessary to deliver overall housing requirement for district.</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td>1250-1300 not consistent with SE Plan. Remainder of district outside Sussex coast needs to be 1600+.</td>
<td>*** Examine need for greater explanation of SE Plan policy on Sussex Coast housing numbers. The relative proportions have to a large extent already been set in the SE Plan.**</td>
</tr>
<tr>
<td></td>
<td>*** Consider table in Core Strategy defining Sub-Region split.**</td>
<td>*<strong>Examine need to make links to overall District housing numbers more explicit.</strong></td>
</tr>
<tr>
<td></td>
<td>*<strong>Examine need for greater clarity in Rural Settlements</strong></td>
<td>*<strong>Examine need for greater clarity in Rural Settlements</strong></td>
</tr>
</tbody>
</table>
| Study regarding housing numbers.  
  * Further landscape study – evidence base at publication? |
|---|
| **Exceptions Sites**  
Remove the 65 dwellings suggested under the "Exception Sites". These are unidentified Windfalls contrary to Government Policy.  
* Examine recent inspectors reports and/or seek advice from GOSE, SEERA and other local authorities regarding their approach to given exception site targets.|
| **Windfall Sites**  
Housing figures should/not include windfall sites  
Continue to monitor inspectors' reports and GOSE/SEERA pronouncements regarding windfalls, in order to ensure RDC approach is sound. Assess potential use via SHLAA.|
| **Phasing approach**  
Phasing approach is unsupportable. Allocated sites may not come.  
Phasing of development along A21 in latter plan period is not justifiable as council offers no evidence that the A21 as existing is not capable of accommodating any additional development.  
Clarify A21 position with HA and ESCC Highways. Gather their views regarding phasing of development sites in Rother.|
| **Retention of Services**  
Can the LDF provide support for retention of shops and post offices, as well as local food producers? Also protect churches and church halls.  
* Review list of services for which retention is supported. Consider addition of  
  - post offices  
  - churches & church halls  
  - local food producers (investigate legality of this – since it does not relate to a |
<table>
<thead>
<tr>
<th>Demographic Imbalance</th>
<th>Problem in villages that needs to be specifically highlighted. Gives urgency to affordable housing policies and ICT.</th>
<th>Consider providing additional background statistics on this matter in Rural Settlements Study.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rural Businesses</td>
<td>Rural &amp; economy sections would benefit from additional analysis of the options and means to secure economic development consistent with protection of environment and heritage.</td>
<td>* Consider need for more clarity on positive measures such as encouraging local job opportunities and homeworking. Additional analysis of the options and means to secure economic development * Investigate making more formula-driven link between balance of jobs to dwellings in rural areas, to use as a basis for establishing areas of employment need. Apply this in Rural Settlement Strategy and run past Parish Councils.</td>
</tr>
<tr>
<td>Support for Tourist &amp;</td>
<td>More support for tourism</td>
<td>* Review section</td>
</tr>
<tr>
<td>Leisure Economy in Rural Areas – particularly at Camber.</td>
<td>needed. CS fails to plan for enhancement or growth of tourist sector + uses wording and direction which would severely inhibit redevelopment and enhancement of this primary business long established in Camber (the reason for Camber’s existence). Recognise need for additional tourist accommodation.</td>
<td>Clarify cross reference to specific tourism part of ‘Economy’ section. – restructure document? * Consider more explicit reference to Camber in Rural section. * Consider liaising with Tourism South East and 1066 Country Marketing Partnership (+ make sure they are on contacts list) * Liaise with RDC Regeneration * Input findings of recent accommodation studies</td>
</tr>
<tr>
<td>---</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>Education</td>
<td>Some schools may have problem with capacity and expansion.</td>
<td>Continue liaison with ESCC Education. Set up meeting.</td>
</tr>
<tr>
<td>Kent &amp; East Sussex Railway</td>
<td>Mention Kent &amp; East Sussex Railway. Mention Robertsbridge to Bodiam link.</td>
<td>C/R transport chapter – consider including reference to this in rural chapter. Is this strategic?</td>
</tr>
<tr>
<td>Bus services in rural areas</td>
<td>Need to be improved – the number, frequency and reliability of services being an issue. But the strategy to improve does not seem to tie in with the ESCC plans to reduce bus services in the area.</td>
<td>Liaise with ESCC about ongoing bus/community transport review. C/R with transport section. Re-emphasise indirect support for bus services implied by service centre approach.</td>
</tr>
<tr>
<td>Traffic</td>
<td>Many traffic issues – speeding, quality of village, severance of many communities. Need to reduce need to travel needs to be highlighted as a strategic objective.</td>
<td>Consider degree of C/R and overlap with transport section. Review again LTP – to ensure sufficient reference is made.</td>
</tr>
<tr>
<td>Employment (cross reference with employment chapter)</td>
<td>Emphasis and support towards agriculture and equestrian businesses as contribute to local economy</td>
<td>Expand reference to equestrian facilities in Strategy</td>
</tr>
<tr>
<td>Section</td>
<td>Details</td>
<td></td>
</tr>
<tr>
<td>----------------------------------------------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------------</td>
<td></td>
</tr>
<tr>
<td>Development Control Policies</td>
<td>Is this the place for DC policies</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Liaise with DC. Review usage and significance to strategy. PINS view?</td>
<td></td>
</tr>
<tr>
<td>CHAPTER 10 Communities</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Aims &amp; Objectives for Communities</td>
<td>A&amp;O should refer to maintenance of key services and the fostering of sustainable communities.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Review Aims and Objectives in light of comments.</td>
<td></td>
</tr>
<tr>
<td>‘Pride of Place’</td>
<td>Lack of reference to this in communities section. Theme of strengthening community life, with a strong social inclusion objective should be a primary driver for the Rother LDF.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>C/R again to both Pride of Place and LSP. Identify if anything in LDF is lacking. Consider greater and more explicit reference to ‘social inclusion’</td>
<td></td>
</tr>
<tr>
<td>Voluntary and Faith sectors</td>
<td>Limited reference to contribution of clubs and societies in building community. No reference to faith community.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Review coverage of voluntary sector with P&amp;P Section and LSP</td>
<td></td>
</tr>
<tr>
<td>Arts &amp; Culture</td>
<td>Should be included and should have policies.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Valid issues to review in light of comments.</td>
<td></td>
</tr>
<tr>
<td>HOUSING</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| Preferred Strategy for Housing and Affordable Housing Targets | Inadequate evidence base Out of date evidence base Lack of financial viability assessment. AH target should be set out, together with the HLC  | * Progress ‘Housing Options Viability Study’  
* Review HMA & HNS with Housing section and HBC.  |
<table>
<thead>
<tr>
<th>Topic</th>
<th>Description</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Market Housing</strong></td>
<td>Questions whether the document adequately reflects broader requirements of the community not just affordable housing.</td>
<td>Include more on household type requirements with reference to (S)HMA. Discuss with Housing.</td>
</tr>
<tr>
<td><strong>Live-Work Housing</strong></td>
<td>Needs to be covered in this section?</td>
<td>Review need for greater reference and C/R to this subject in light of comments.</td>
</tr>
<tr>
<td><strong>Second Homes</strong></td>
<td>Needs to consider role of 2nd homes in creating a housing shortage.</td>
<td>Review national policy. Review recent developments on this subject (eg in Lake District national park)</td>
</tr>
<tr>
<td><strong>Allocations wholly or predominantly for AH</strong></td>
<td>AH % should be consistent on all types of site, whether allocated or not.</td>
<td>* Discuss further with Housing. * Review policies in other LDFs * Consistent with PPS3?</td>
</tr>
<tr>
<td><strong>Housing Mix</strong></td>
<td>Must provide guidance on housing mix.</td>
<td>*use review to inform housing mix policy – check conformity with PPS and guidance – affordable housing only.</td>
</tr>
<tr>
<td><strong>Housing Density</strong></td>
<td>SEERA comment that commitment should be made to regional density target of 40ph (as set out in Policy H5 of SE Plan).</td>
<td>Review PPS3 and SE Plan stipulations on this matter, particularly in relation to local character.</td>
</tr>
<tr>
<td><strong>HEALTH and RECREATION</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Natural Green Spaces</td>
<td>From RSPB: New or enhanced natural greenspace sought to mitigate residential disturbance to international sites.</td>
<td>* Review evidence base for quantifying the current and predicted recreational impacts on Natura 2000 sites arising from policies in the Plan (as part of biodiversity section) * Review comments in relation to open space study standards for natural greenspace and NE’s ANGST standard.</td>
</tr>
<tr>
<td>------------------------------------------</td>
<td>-------------------------------------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Infrastructure</td>
<td>SEERA comment: Need overarching guidance on infrastructure to incorporate policies CC7 and CC89 using the infrastructure definition set out in Box CC2 of the SE Plan.</td>
<td>Review SE Plan and consider change in light of comment. Consider how to present Infrastructure Plan?</td>
</tr>
</tbody>
</table>

**GYPSIES and TRAVELLERS**

| Number of sites sought and location of sites | Revision of strategy in line with latest regional position and sites approved locally | Update – liaise with neighbouring LAs                                                                                   |

**YOUNG PEOPLE**

| Young Persons Strategy                      | No defined ‘Preferred Strategy’ for young people!! Needs one that is far-reaching. Rother Residents Survey 2006 had the highest priority for the Council to provide ‘activities for teenagers’ – but there has been limited action to address. | Produce preferred strategy. Review other plans – Pride of Place and LSP material as well as Corportae Plan, Rother Residents Survey for C/R. Agree content with Youth Strategy Working Group. |

**OLDER PEOPLE**

<p>| Strategy                                  | Need to cover more than housing issues; local | C/R with Pride of Place and other relevant strategies.                                                                 |</p>
<table>
<thead>
<tr>
<th>Section</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>HOW TO RESPOND</td>
<td>shopping essential in allowing older people to continue independence.</td>
</tr>
<tr>
<td>Other Vulnerable Groups</td>
<td>Needs also need to be recognised, including those with learning difficulties.</td>
</tr>
<tr>
<td>CRIME REDUCTION and PREVENTION</td>
<td></td>
</tr>
<tr>
<td>Neighbourhood watch schemes</td>
<td>Is this strategic? Review section with Thelma Blankley.</td>
</tr>
<tr>
<td>CHAPTER 11 Economy</td>
<td></td>
</tr>
<tr>
<td>Securing economic development</td>
<td>Set out and adopt Smart Growth principles Review SEPlan and SEERA guidance on economic policies in LDFs due soon</td>
</tr>
<tr>
<td></td>
<td>Is ec dev viable? Draw on NE Bexhill work, in ass with 1066 Enterprise, LES</td>
</tr>
<tr>
<td>Strategic sites</td>
<td>Identify strategic sites Consider whether to allocate NE Bexhill, or keep as “broad location”; same for Hastings fringes and any other key sites (Rye Harbour Road?)</td>
</tr>
<tr>
<td></td>
<td>Include Ibstock area with NE Bexhill See above, plus further work on strategic growth area</td>
</tr>
<tr>
<td></td>
<td>Identify A21 Enviro-corridor Speak to HBC on consistency and Sea Space on evidence work;</td>
</tr>
<tr>
<td></td>
<td>Consider impact of urban edge ec dev on town centres See BHLR inclusion work; make linkages (physical and strategy) between the two</td>
</tr>
<tr>
<td>Role of ICT</td>
<td>Need to upgrade broadband speeds/capacity Discuss ongoing Sea Space, etc work; consider as part of strategy and as possible infrastructure</td>
</tr>
<tr>
<td>Home working</td>
<td>Needs more attention, Review SEERA research,</td>
</tr>
<tr>
<td>Role of education/skills</td>
<td>Need to develop skills (centres) outside Bexhill</td>
</tr>
<tr>
<td>--------------------------</td>
<td>-------------------------------------------------</td>
</tr>
<tr>
<td></td>
<td>Recognise needs for skills in supporting ageing population</td>
</tr>
<tr>
<td>Retail development</td>
<td>Identify town centres first hierarchy</td>
</tr>
<tr>
<td>Tourism accommodation</td>
<td>Potential for holiday lodges and parks</td>
</tr>
<tr>
<td>Green tourism</td>
<td>Need new strategy</td>
</tr>
</tbody>
</table>

CHAPTER 12 Environment

LANDSCAPE STEWARDSHIP

DESIGN QUALITY and the BUILT ENVIRONMENT

Strategy Progression

Public realm

Work up of design principles

Specific section on public realm and integration into whole Core Strategy

BIODIVERSITY and GREENSPACE

Biodiversity gain

More detail on how to achieve a net biodiversity gain from development

Further liaison with Natural England and the Sussex Wildlife Trust

Climate change

Reference to climate change on coastal habitats

Ecological assessment of coastal habitats?
| SUSTAINABLE RESOURCE MANAGEMENT |  |  |
|---------------------------------|---------------------------------|
| Renewable energy                | Provide detail of potential to exploit Rother’s natural resources for renewable energy – particularly biomass (also cardboard and biodegradable refuse, which is classified as biomass), solar and wind | Study for the implementation of Option 2 – including renewable energy potential for sites (Merton) and strategic generation; and ability to set requirement for Codes and under what site-specific parameters |
| Waste and Minerals resources    | Consider minimisation of consumption and extraction of minerals in new construction | Clarify coverage with WPA |
| Policy alignment                | Improve alignment with South East Plan policies | Regional guidance and clarify PPS/RSS consistency? |

| WATER SUPPLY and WASTEWATER RESOURCE MANAGEMENT |  |  |
|------------------------------------------------|---------------------------------|
| Strategic allocation of land                | Strategic allocation of land for enlargement of Bewl (and Darwell) | Consider whether to allocate land in line with draft Water Resource Management Plan for land at Bewl. Liaise with South East Water |
| Water Framework Directive                  | Direction to improve status of water bodies in line with WFD | liaise with EA |

| FLOOD RISK |  |  |
|------------|---------------------------------|
| Economics of flood defence management      | Identify that Shoreline and Catchment Management Plans will be subject to review and future expenditure on flood defences is not necessarily guaranteed – implications for Rye Harbour | Liaise with EA particularly regarding Rye Harbour |
| Application on sequential and exception tests |  | liaise with EA |
| More specific information on the application of the sequential test in Rother and requirements for development sites in the floodplain |

### CHAPTER 13 Transport and Accessibility

| Rail improvements | Electrification and dualling Ashford to Hastings line  
High speed Hastings to London | Not in route utilisation strategy; consultation with Network Rail on what improvements are planned and what CS can say on rail service improvements |
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>New stations</td>
<td>Glyne Gap, Wilting</td>
<td>Work with Sea Space on Glyne Gap and Wilting to develop deliverable schemes</td>
</tr>
<tr>
<td>Sustainable linkages and Regional transport hub</td>
<td>Recognising sustainable modes and utilising the regional hub to focus improvements on sustainable transport</td>
<td>liaise with HBC, Sea Space and ESCC</td>
</tr>
<tr>
<td>Link Road contingency</td>
<td>Clarity on Link Road contingency if delays</td>
<td>liaise with ESCC</td>
</tr>
</tbody>
</table>

### CHAPTER 14 Implementation and Monitoring Framework

| Indicators | NE wishes to see air pollution, BAP habitat indicators | Develop indicator set with LSP |
| Delivery plan | Highlight delivery plans | Discuss with GOSE; draft infrastructure plan |
| Development contributions | Highlight in Box 37 | Need to show this SPD as part of an overall delivery plan. |
Appendix 11 – Copies of adverts for Strategy Directions’ consultation

PUBLIC CONSULTATION ON NEW ROTHER PLANNING STRATEGY BEGINS TODAY
Rother LHF Core Strategy ‘Consultation on Strategy Directions’
Rother District Council has prepared a document entitled ‘Consultation on Strategy Directions’ to encourage public involvement in the preparation of its Core Strategy, which will form part of its Local Development Framework (LDF).

The Core Strategy will set out the spatial vision and strategies for development and change in the district for the period up to 2025. The consultation is inviting comments on the Core Strategy: Consultation on Strategy Directions’ document and the accompanying Initial Sustainability Appraisal. The consultation is open a period of ten weeks until 30th January 2009.

The consultation document and supporting material can be viewed on the Council’s website at www.rother.gov.uk/corestrategy and at its Community Help Points (CHPs) at:

- Amersham Road, Bexhill
  (9.30am - 4.30pm Mon, Tues, Thurs & Fri, Wed 9.30am - 4.30pm)
- 14, Market Square, Rye
  (9.30am - 4.30pm Mon, Tues, Thurs & Fri, Wed 10.30am - 4.30pm)
- St. George’s Parade, Rye
  (9.30am - 4.30pm Mon, Tues, Thurs & Fri, Wed 10.30am - 4.30pm)

Paper copies of the Core Strategy: Consultation on Strategy Directions’ document may be purchased from the CHPs or by post from the address below (price £1.50, plus £1.50 p&p). Cheques should be made payable to Rother District Council.

A Summary Leaflet is freely available on request from the CHPs or by contacting the Planning Strategy and Environment section on 01424 787694.

Exhibitions will be held in Bexhill, Rye, Tenterden and Westfield. Details are on the Council’s website and in the summary leaflet.

A Comments Form is also available. Comments may be made either:

- online (preferred approach) at www.rother.gov.uk/corestrategy
- by post to: LHF Strategy Directions Consultation, Rother District Council, Town Hall, Bexhill-on-Sea, East Sussex, TN39 1XJ

All representations must be received no later than 4.30pm on Friday 30th January 2009.

Crispin Somers, Chief Executive
7th November 2008

Rye Observer
Friday November 7th 2008

Bexhill Observer
Friday November 7th 2008

↓ Battle Observer Friday 7th 2008
Exhibition chance to check Rother vision for future

by John Dowling

Most areas of Bexhill recorded a worsening in relative deprivation levels between 2004 and 2007, visitors to an exhibition devoted to planning for a better future have learned.

Bexhill has a higher percentage of households on low incomes below 60% of the national average than the rest of Rother.

One third of Bexhill’s 42,280 population is aged over 65 and just 26.5% is aged under 30.

Rother district must find room for between 5,600 and 5,800 new homes and 100,000 square metres of new business floor space in the next 18 years to meet plans for the south-east.

Between 3,100 and 3,300 of the new homes and 60,000 square metres of the business floor space will be in Bexhill.

These are some of the reasons why Rother is evolving what it calls its Core Strategy for the future.

Last Thursday and Friday the De La Warr Pavilion’s new Studio was given over to a public exhibition explaining the proposals.

The venue was one of seven across the district hosting the exhibition as part of public consultation into the proposals for the Core Strategy, which will form the heart of the council’s Local Development Framework.

This will set out how the development of the district will be managed and will eventually replace the current Local Plan.

Principal planning officer David Marlow and colleagues running the pavilion exhibition say the LDF will be one of the most important documents the council has to produce.

Information leaflets at the exhibition summarising the proposals stressed the importance of reading the information carefully.

It says: “It will be difficult to introduce new issues at a later stage of the process so this is a vital opportunity for local people, businesses and organisations to help shape future development and change.

“The council wants your views to ensure that policy decisions are informed by local people’s ideas and that development best serves local needs and priorities.”

In a ‘Vision for Rother in 2020’, the authority aims for a high quality of life, achieved by continuing to support and further develop ‘vibrant, safe, balanced and inclusive communities’.

It says sustainable economic growth will have been secured, with much-improved job opportunities which will have encouraged young people to stay in the area and greater prosperity for all.

It wants improved economic and social well-being made possible by better access to jobs and services and improved connectivity with the rest of the region.

The vision covers ‘vital stewardship of the local environment’.

It goes on: “Bexhill will have retained and strengthened its distinct identity and become one of the most attractive places to live on the south coast – attractive to families, the young and older people alike.

“The overall development strategy being proposed seeks to promote a better balance between homes and jobs with new development. At the heart of the strategy for Bexhill is accomplishing economic turnaround and promoting sustainable growth.

“Core to this is the timely delivery of the Bexhill/Hastings Link Road, which will provide the catalyst for building new communities and strategic employment areas located to the north and north-east of the town.

“Within the town, the strategy proposes to deliver a new secondary school and vocational centre, new shopping floor space primarily around the railway, and a new multi-purpose leisure centre.

“The strategy identifies investment in streets and other public spaces, including the seafront and green spaces, notably through the establishment and future extension of the town’s coastal path, and the establishment of new multi-purpose leisure centre.

“In total, the strategy proposes between 3,100 and 3,800 new homes and substantial new business areas predominantly to be provided to the north east and subsequently to the north of the town, as well as within the town.”

The deadline for submitting comments on the proposals is Friday, January 20.
Public consultations to discuss district strategy

Rother: plan for future

THE future landscape of Rother will be discussed in a new document.

Rother District Council published the report that will lead to a new long-term plan for developments in the district on Tuesday.

Now residents will be consulted on the plan.

The council's 'Care Strategy: Consultation on Strategy Directions' is an interim document, setting out its preferred strategy directions.

It will map the nature and broad locations for new housing, business and retail development, as well as highlighting the infrastructure needed to support it, and the priorities for conservation.

Rother's lead cabinet member, Cllr Paul Osborne, said: "This document has been prepared with the specific intention of encouraging local residents and businesses to input their views, so we can ensure that the final strategy best serves local needs and priorities.

Introduction

"I urge people to find out more about the proposals either from our website or by visiting one of the exhibitions. "The free summary leaflet gives a useful introduction to the proposed strategy.""

The public consultation runs for 12 weeks, until Friday, January 30. Exhibitions will be held at:

- Battle Memorial Hall - November 24 (2.30pm - 7.30pm)
- Ticehurst Institute - November 25 (2.30pm - 7.30pm)
- De La Warr Pavilion, Bexhill - November 27 (2.30pm - 7.30pm) and November 28 (10am to 4pm)
- Northiam Village Hall - December 2 (2.30pm - 7.30pm)
- Robertsbridge Community Hall - December 4 (2.30pm - 7.30pm)

The leaflet and main document are available online at www.rother.gov.uk/carestrategy and from the council's Community Help Points.

Documents can also be ordered by telephoning 01424 787636 or writing to LDF Strategy Directions Consultation, Rother District Council, Town Hall, Bexhill-on-Sea, East Sussex, TN39 3JX. The main document costs £10 (plus £1.68 p&p).

Draft plan for Battle's future

DRAFT plans for the future of Battle over the next 20 years will be unveiled to residents at a one-off exhibition on Monday.

The Local Development Framework, which is being prepared by Rother District Council, focuses on how the town and surrounding villages should develop over the next two decades.

The draft plan includes how many new homes should be built, how Battle's roads should be developed and changes to the town's infrastructure.

In the wake of Blackfriars, the issue of how many new homes should be earmarked for the town is likely to stir strong feelings among local folk.

The report suggests between 80 and 130 new homes should be built in Battle by 2026 and identifies five possible areas for development.

Speaking at this week's town council meeting, Cllr Harris said: "Visitors come here for the dentists and banking and Post Office from villages such as Ticehurst and Sedlescombe and surrounding villages, and tourist visits."

"Only about 30 per cent come up from the south from Hastings."

"Up to 70 per cent come from the other directions, the north, east and west, so why on earth would we want to put a car park at the other end of the town?"

The draft LDF also includes plans for a swimming pool, but not the hoped-for community centre.

Cllr Harris said: "What we have to do is draw the attention of the town's people and find out their views."

The Local Development Framework plans will be on show at Battle Memorial Hall at an exhibition on Monday.

And residents will get the chance to have their say on the plans at a public meeting, organised by Battle Town Council, on December 10 at Battle Memorial Hall, starting at 7.30pm.

Cllr Harris added: "This consultation is important to the future of the town and I hope everyone will take an opportunity to express their views."
Have your say on housing and business future

THE future landscape of Rother will be discussed in a new document.

Rother District Council published the report that will lead to a new long-term plan for developments in the district on Tuesday.

Now residents will be consulted on the plan.

The council's 'Core Strategy: Consultation on Strategy Directions' is an interim document, setting out its preferred 'strategy directions'.

It will map the nature and broad locations for new housing, business and retail development, as well as highlighting the infrastructure needed to support it, and the priorities for conservation.

Rother's lead cabinet member, Cllr Paul Osborne, said: "This document has been prepared with the specific intention of encouraging local residents and businesses to input their views, so we can ensure that the final strategy best serves local needs and priorities.

"I urge people to find out more about the proposals either from our website or by visiting one of the exhibitions."

The free summary leaflet gives a useful introduction to the proposed strategy.

The public consultation runs for 12 weeks, until Friday, January 30.

Exhibitions will be held at:

- Battle Memorial Hall - November 24 (2.30pm - 7.30pm)
- Ticehurst Institute - November 25 (2.30pm - 7.30pm)
- De La Warr Pavilion, Bexhill - November 27 (2.30pm - 7.30pm) and November 28 (10am to 4pm)
- Northiam Village Hall - December 2 (2.30pm - 7.30pm)
- Robertsbridge Community Hall - December 4 (2.30pm - 7.30pm)

The leaflet and main document are available online at www.rother.gov.uk/corestrategy and from the council's Community Help Points.

Documents can also be ordered by telephoning 01424 787634 or writing to LDF Strategy: Directions Consultation, Rother District Council, Town Hall, Bexhill-on-Sea, East Sussex, TN39 3TX. The main document costs £10 (plus £1.68 p&p).
Appendix 13 – Breakdown of Representations

PART 1 - INTRODUCTION, CONTEXT AND VISION
No representations
1. Introduction
   There are 2 representations without a response
2. Spatial Portrait
   There are 7 representations without a response
3. Vision for the Future
   There are 6 representations without a response
   Box 1 - Vision for the Future
   There are 22 representations without a response
4. Policy Context
   There are 6 representations without a response

PART 2 - SPATIAL STRATEGY
There are 2 representations without a response
5. Overall spatial Development Strategy
   There are 73 representations without a response
   Box 2 - Aim and Objectives of Spatial Development Strategy
   There are 13 representations without a response
   Box 3 - Preferred Strategy for Overall Spatial Development
   There are 57 representations without a response
   Box 4 - Preferred Strategy for timing of Bexhill/Hastings Link Road
   There are 27 representations without a response
   Box 5 - Preferred Strategy for Development Boundaries
   There are 18 representations without a response
   Box 6 - Preferred Strategy for Determining the most Appropriate Development Locations
   There are 19 representations without a response
   Box 7 - Preferred Strategy for ensuring appropriately high quality development
   There are 6 representations without a response

6. Bexhill and Hastings Fringes
There are 28 representations without a response
   Box 8 - Shared Vision for Bexhill and Hastings
   There are 8 representations without a response
   Box 9 - Bexhill Aim and Objectives
   There are 5 representations without a response
   Box 10 - Preferred Strategy for Bexhill
   There are 35 representations without a response
   Box 11 - Preferred Strategy for Hastings Fringes
   There are 24 representations without a response

7. Battle
There are 48 representations without a response
   Box 12 - Battle Aim and Objectives
   There are 11 representations without a response
   Box 13 - Preferred Strategy Direction for Battle
   There are 56 representations without a response

8. Rye and Rye Harbour
There are 65 representations without a response
Box 14 - Rye and Rye Harbour Aim and Objectives
There are 10 representations without a response

Box 15 - Preferred Strategy for Rye and Rye Harbour
There are 91 representations without a response

9. Rural Areas
There are 41 representations without a response

Box 16 - Aim and Objectives for Rural Areas
There are 24 representations without a response

Villages
There are 21 representations without a response

Box 17 - Preferred Strategy for Villages
There are 59 representations without a response

Box 18 - Preferred Strategy for Countryside
There are 26 representations without a response

PART 3 - STRATEGY THEMES
There are 2 representations without a response

10. Communities
There are 17 representations without a response

Box 19 - Aim and Objectives for Communities
There are 4 representations without a response

Housing
There are 11 representations without a response

Box 20 - Preferred Strategy for Housing
There are 13 representations without a response

Box 20 - Percentage of Affordable Housing
There are 8 representations without a response

Option a
No representations

Option b
There are 3 representations without a response

Box 20 - Threshold of Affordable Housing (rural areas)
There are 6 representations without a response

Option b i
No representations

Option b ii
No representations

Box 20 - Type of Affordable Housing
There are 8 representations without a response

Box 20 - Allocations for Affordable Housing and Exception Sites
There are 5 representations without a response

Box 20 - Housing mix, homelessness and Private Sector Housing Renewal
There are 6 representations without a response

Option a i
There is 1 representation without a response

Option a ii
There are 2 representations without a response

Health and Recreation
There are 4 representations without a response

Box 21 - Preferred Strategy for Health, Recreation and Community Facilities
There are 16 representations without a response

Gypsies and Travellers
No representations

Box 22 - Preferred Strategy for Gypsies and Travellers
There are 8 representations without a response

Young People
There are 7 representations without a response

Older People
There are 3 representations without a response

Box 23 - Preferred Strategy for Older People
There are 5 representations without a response

Crime Reduction and Prevention
There are 2 representations without a response

Box 24 - Preferred Strategy for Crime Reduction and Prevention
There are 6 representations without a response

11. Economy
There are 13 representations without a response

Box 25 - Aim and Objectives for Economy
There are 8 representations without a response

Sustainable Economic Development
No representations

Employment Land and Premises
No representations

Tourism
No representations

Box 26 - Preferred Strategy for Economy
There are 10 representations without a response

Box 26 - (a) For a co-ordinated approach to sustainable economic development
There are 3 representations without a response

Box 26 - (b) For employment land and premises
There are 2 representations without a response

Box 26 - (c) For tourism
There are 11 representations without a response

12. Environment
There are 22 representations without a response

Box 27 - Aims and Objectives for the Environment
There are 15 representations without a response

Landscape Stewardship
There is 1 representation without a response

Box 28 - Preferred Strategy for Landscape Stewardship
There are 16 representations without a response

Design Quality and Built Environment
There are 2 representations without a response

Box 29 - Preferred Strategy for Design Quality and Built
Environment
There are 12 representations without a response
Biodiversity and Greenspace
There are 2 representations without a response
**Box 30 - Preferred Strategy for Biodiversity and Greenspace**
There are 11 representations without a response
Sustainable Resource Management
There are 10 representations without a response
Box 31 - Preferred Strategy for Sustainable Resource Management
(Option 1)
There are 16 representations without a response
Box 31 - Preferred Strategy for Sustainable Resource Management
(Option 2)
There are 6 representations without a response
Water Supply and Wastewater Resource
There are 2 representations without a response
**Box 32 - Preferred Strategy for Water Supply and Wastewater Resource Management**
There are 15 representations without a response
Flood Risk
There are 5 representations without a response
**Box 33 - Preferred Strategy for Flood Risk**
There are 16 representations without a response

13. Transport and Accessibility
There are 22 representations without a response
**Box 34 Aim and Objectives**
There are 13 representations without a response
Strategic Accessibility
There are 2 representations without a response
Local Accessibility and Sustainable Travel Patterns
No representations
**Box 35 - The Preferred Strategy for Transport and Accessibility**
There are 13 representations without a response
Paragraph a
There are 7 representations without a response
Paragraph b
There are 3 representations without a response

There is 1 representation without a response
**Box 36 - Aim and Objectives**
There are 4 representations without a response
**Box 37 - Preferred Strategy to guide overall implementation**
There are 5 representations without a response

Map 1 - District Key Diagram
There are 6 representations without a response
Map 2 - Bexhill and Hastings Fringes Inset Diagram
There is 1 representation without a response
Appendices
No representations

Appendix 1 - Glossary of Terms
There are 4 representations without a response

Appendix 2 - List of relevant policies, plans, strategies and programmes
There are 2 representations without a response

Appendix 3 - Components of housing supply
There is 1 representation without a response

Appendix 4 - Implementation and Monitoring Framework
There are 3 representations without a response

Comments on any other Core Strategy matter
## Appendix 14 – Bexhill College event

### Question 1

Q1 Thinking generally, how important are the following in making somewhere a good place to live (Please score from 5 Very Important to 1 Not at All Important)

<table>
<thead>
<tr>
<th>Percentages</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Transport</td>
<td>6%</td>
<td>0%</td>
<td>6%</td>
<td>25%</td>
<td>63%</td>
<td>100</td>
</tr>
<tr>
<td>Clean Streets</td>
<td>0%</td>
<td>0%</td>
<td>6%</td>
<td>38%</td>
<td>56%</td>
<td>100</td>
</tr>
<tr>
<td>Job prospects</td>
<td>0%</td>
<td>6%</td>
<td>31%</td>
<td>13%</td>
<td>50%</td>
<td>100</td>
</tr>
<tr>
<td>Wage levels and local cost of living</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>56%</td>
<td>44%</td>
<td>100</td>
</tr>
<tr>
<td>Convenient &amp; quick access to Brighton</td>
<td>0%</td>
<td>0%</td>
<td>25%</td>
<td>31%</td>
<td>44%</td>
<td>100</td>
</tr>
<tr>
<td>The level of crime</td>
<td>0%</td>
<td>0%</td>
<td>7%</td>
<td>53%</td>
<td>40%</td>
<td>100</td>
</tr>
<tr>
<td>Education provision</td>
<td>0%</td>
<td>7%</td>
<td>20%</td>
<td>33%</td>
<td>40%</td>
<td>100</td>
</tr>
<tr>
<td>Health services</td>
<td>0%</td>
<td>13%</td>
<td>6%</td>
<td>44%</td>
<td>38%</td>
<td>100</td>
</tr>
<tr>
<td>Cultural nightlife - Cinemas, Theatres</td>
<td>0%</td>
<td>6%</td>
<td>19%</td>
<td>38%</td>
<td>38%</td>
<td>100</td>
</tr>
<tr>
<td>Convenient &amp; quick access to London</td>
<td>0%</td>
<td>6%</td>
<td>25%</td>
<td>31%</td>
<td>38%</td>
<td>100</td>
</tr>
<tr>
<td>Convenient &amp; quick access to Hastings</td>
<td>0%</td>
<td>0%</td>
<td>38%</td>
<td>25%</td>
<td>38%</td>
<td>100</td>
</tr>
<tr>
<td>Shopping facilities</td>
<td>0%</td>
<td>6%</td>
<td>25%</td>
<td>38%</td>
<td>31%</td>
<td>100</td>
</tr>
<tr>
<td>Race relations</td>
<td>6%</td>
<td>13%</td>
<td>19%</td>
<td>31%</td>
<td>31%</td>
<td>100</td>
</tr>
<tr>
<td>Convenient &amp; quick access to Eastbourne</td>
<td>0%</td>
<td>0%</td>
<td>44%</td>
<td>25%</td>
<td>31%</td>
<td>100</td>
</tr>
<tr>
<td>Vivrant night-life - Pubs, Restaurants, Nightclubs</td>
<td>0%</td>
<td>13%</td>
<td>31%</td>
<td>25%</td>
<td>31%</td>
<td>100</td>
</tr>
<tr>
<td>Affordable decent housing to buy</td>
<td>0%</td>
<td>7%</td>
<td>40%</td>
<td>27%</td>
<td>27%</td>
<td>100</td>
</tr>
<tr>
<td>The level of pollution</td>
<td>0%</td>
<td>0%</td>
<td>31%</td>
<td>44%</td>
<td>25%</td>
<td>100</td>
</tr>
<tr>
<td>Access to nature</td>
<td>6%</td>
<td>0%</td>
<td>38%</td>
<td>31%</td>
<td>25%</td>
<td>100</td>
</tr>
<tr>
<td>Cultural facilities (e.g. libraries, museums)</td>
<td>13%</td>
<td>6%</td>
<td>38%</td>
<td>19%</td>
<td>25%</td>
<td>100</td>
</tr>
<tr>
<td>Affordable decent housing to rent</td>
<td>0%</td>
<td>0%</td>
<td>20%</td>
<td>60%</td>
<td>20%</td>
<td>100</td>
</tr>
<tr>
<td>Parks and open spaces</td>
<td>13%</td>
<td>0%</td>
<td>13%</td>
<td>56%</td>
<td>19%</td>
<td>100</td>
</tr>
<tr>
<td>Sports and leisure facilities</td>
<td>0%</td>
<td>6%</td>
<td>25%</td>
<td>50%</td>
<td>19%</td>
<td>100</td>
</tr>
<tr>
<td>Outdoor activities for teenagers (e.g. skate parks)</td>
<td>0%</td>
<td>6%</td>
<td>38%</td>
<td>38%</td>
<td>19%</td>
<td>100</td>
</tr>
<tr>
<td>Leisure Centres, Swimming Pools and Indoor Sports</td>
<td>0%</td>
<td>6%</td>
<td>50%</td>
<td>25%</td>
<td>19%</td>
<td>100</td>
</tr>
<tr>
<td>the level of traffic congestion</td>
<td>0%</td>
<td>0%</td>
<td>20%</td>
<td>67%</td>
<td>13%</td>
<td>100</td>
</tr>
</tbody>
</table>
Question 2

<table>
<thead>
<tr>
<th>Q2 And thinking about your local area, which of the things below, if any, do you think most need improving? (Please score from 5 Most Needs Improving to 1 Does not need improving) Percentages</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cultural nightlife - Cinemas, Theatres</td>
<td>13%</td>
<td>6%</td>
<td>13%</td>
<td>31%</td>
<td>38%</td>
<td>100</td>
</tr>
<tr>
<td>Wage levels and local cost of living</td>
<td>6%</td>
<td>0%</td>
<td>31%</td>
<td>38%</td>
<td>25%</td>
<td>100</td>
</tr>
<tr>
<td>Vibrant night-life - Pubs, Restaurants, Nightclubs</td>
<td>6%</td>
<td>31%</td>
<td>13%</td>
<td>25%</td>
<td>25%</td>
<td>100</td>
</tr>
<tr>
<td>Public Transport</td>
<td>6%</td>
<td>13%</td>
<td>31%</td>
<td>31%</td>
<td>19%</td>
<td>100</td>
</tr>
<tr>
<td>Clean Streets</td>
<td>19%</td>
<td>13%</td>
<td>19%</td>
<td>31%</td>
<td>19%</td>
<td>100</td>
</tr>
<tr>
<td>Community Activities</td>
<td>6%</td>
<td>19%</td>
<td>31%</td>
<td>25%</td>
<td>19%</td>
<td>100</td>
</tr>
<tr>
<td>The level of crime</td>
<td>13%</td>
<td>25%</td>
<td>19%</td>
<td>25%</td>
<td>19%</td>
<td>100</td>
</tr>
<tr>
<td>Shopping facilities</td>
<td>13%</td>
<td>6%</td>
<td>44%</td>
<td>19%</td>
<td>19%</td>
<td>100</td>
</tr>
<tr>
<td>Convenient &amp; quick access to London</td>
<td>19%</td>
<td>25%</td>
<td>25%</td>
<td>13%</td>
<td>19%</td>
<td>100</td>
</tr>
<tr>
<td>Affordable decent housing to rent</td>
<td>7%</td>
<td>27%</td>
<td>33%</td>
<td>20%</td>
<td>13%</td>
<td>100</td>
</tr>
<tr>
<td>Leisure Centres, Swimming Pools and Indoor Sports</td>
<td>25%</td>
<td>25%</td>
<td>25%</td>
<td>13%</td>
<td>13%</td>
<td>100</td>
</tr>
<tr>
<td>Convenient &amp; quick access to Eastbourne</td>
<td>13%</td>
<td>33%</td>
<td>33%</td>
<td>7%</td>
<td>13%</td>
<td>100</td>
</tr>
<tr>
<td>Education provision</td>
<td>13%</td>
<td>27%</td>
<td>13%</td>
<td>40%</td>
<td>7%</td>
<td>100</td>
</tr>
<tr>
<td>Convenient &amp; quick access to Brighton</td>
<td>13%</td>
<td>20%</td>
<td>33%</td>
<td>27%</td>
<td>7%</td>
<td>100</td>
</tr>
<tr>
<td>Affordable decent housing to buy</td>
<td>7%</td>
<td>27%</td>
<td>40%</td>
<td>20%</td>
<td>7%</td>
<td>100</td>
</tr>
<tr>
<td>the level of traffic congestion</td>
<td>27%</td>
<td>27%</td>
<td>27%</td>
<td>13%</td>
<td>7%</td>
<td>100</td>
</tr>
<tr>
<td>Convenient &amp; quick access to Hastings</td>
<td>20%</td>
<td>40%</td>
<td>20%</td>
<td>13%</td>
<td>7%</td>
<td>100</td>
</tr>
<tr>
<td>Health services</td>
<td>13%</td>
<td>25%</td>
<td>13%</td>
<td>44%</td>
<td>6%</td>
<td>100</td>
</tr>
<tr>
<td>Job prospects</td>
<td>0%</td>
<td>13%</td>
<td>50%</td>
<td>31%</td>
<td>6%</td>
<td>100</td>
</tr>
<tr>
<td>Sports and leisure facilities</td>
<td>19%</td>
<td>25%</td>
<td>19%</td>
<td>31%</td>
<td>6%</td>
<td>100</td>
</tr>
<tr>
<td>Race relations</td>
<td>19%</td>
<td>19%</td>
<td>38%</td>
<td>19%</td>
<td>6%</td>
<td>100</td>
</tr>
<tr>
<td>Acess to nature</td>
<td>19%</td>
<td>31%</td>
<td>31%</td>
<td>13%</td>
<td>6%</td>
<td>100</td>
</tr>
<tr>
<td>The level of pollution</td>
<td>13%</td>
<td>38%</td>
<td>38%</td>
<td>6%</td>
<td>6%</td>
<td>100</td>
</tr>
<tr>
<td>Outdoor activities for teenagers (e.g. skate parks)</td>
<td>13%</td>
<td>44%</td>
<td>31%</td>
<td>6%</td>
<td>6%</td>
<td>100</td>
</tr>
<tr>
<td>Parks and open spaces</td>
<td>38%</td>
<td>31%</td>
<td>19%</td>
<td>6%</td>
<td>6%</td>
<td>100</td>
</tr>
<tr>
<td>Cultural facilities (e.g. libraries, museums)</td>
<td>6%</td>
<td>44%</td>
<td>38%</td>
<td>13%</td>
<td>0%</td>
<td>100</td>
</tr>
</tbody>
</table>
NOTES FROM BUSINESS COMMUNITY WORKSHOP - 20TH JANUARY 2009

Session 1 – general discussion on strengths, weaknesses and opportunities

1. Viability of Development – new business sites need “gap funding” for them to work
2. s106 contributions are imposing a real constraint on viability
3. Need for high quality/best broadband – the area has seen a slowdown of speeds
4. Transport will still remain a necessity, (but perhaps have more focused journeys) and need to recognise car use as being vital to local businesses, as well as public transport in giving access to jobs
5. Core employment skills, notably maths, is poor – and questions raised about both availability and quality of courses
6. Culture of work has changed
7. Reaping what was sown 10 years ago (reference to priorities in Education)
8. Lack of investment
9. New employment opportunities may not be large or even SME size (e.g. one-man IT company)
10. Employment sites in rural areas not considered a ‘nice rural neighbour’ - yet many are, as provide employment and not noisy
11. Commercial centre is the heart of the village and not housing - housing follows – and businesses want to be part of vibrant communities
12. More flexible business space needed, including the ability to expand
13. This area is “off the radar” e.g. sandwiched between Ashford and Brighton – but attractive to live and work
14. Haulage pay a premium due to isolated location
15. Commuters have much higher earnings, while the access to markets to the north is key factor in making the northern section of the A21 a stronger market area

The 4 key themes may be seen as:
   i) Viability of Development
   ii) Employment skills (but identifying what is/will be needed) and connections between Education sector and businesses
   iii) Employment sites in rural areas (in what drives sustainability)
   iv) Technology infrastructure - best and fastest required

These were considered in more detail in Session 2.
Session 2 – Break-out groups

Topic A: WORKFORCE NEEDS

Mixed economy is a strength
More reluctant to commute
Most would rather work close to home
Manufacturing less attractive as a career path
Elderly population will demand more service sector jobs
Focus on young people – encourage to live locally
Transferable skills and basic literacy/numeracy
People expect to be more flexible in career options
Knowledge economy –
  technology and innovation
Knowledge transfer partnerships
  Education/HE/businesses
Understanding of career pathways
Migrant workers
  Pros – bring skills, drive
  Cons – displacement of opportunities
Unco-ordinated training environment – too many agencies
Business support simplification – business link will be focal point
Pressure to increase qualifications
  NVQ3 will be minimal to stay competitive
Flexible, innovative workforce
Fewer people working smarter
Skills – communications ITC
Business management
How to support rapid growth of businesses
Inward investment package to include workforce development
Investment in HE critical
Ensure pathway to local employment opportunities
Prioritise new technologies
  Environmental technology
  Digital media
  Manufacture and engineering
**Topic B: TECHNOLOGY AND INNOVATION**

1. E-commerce and broadband speed as a tool
2. ICT skills in the workforce (or easily accessible)
3. Flexible working – reduce o/h
4. Better communication and innovation  
   (more sophisticated selling!)
5. must be reliable/high quality infrastructure
6. Bursting the business bubble (widen markets)
7. Reducing travel
8. Reducing costs and improving productivity
9. Social networking
   (massive communication by young people that ‘we’ are not accustomed to)
10. Need to think about the above young people may not need to know 369×3 but IT skills may be excellent
11. IT infrastructure critical
12. building (planning) must future proof for IT
13. Key sector development, where is GDP?  
   - digital creative ind
   - advanced engineer
   - environmental technologies
14. Innovation parks – work with colleges on required skills

**Q1**

- Skills – school and business (intellectual architecture facebook for business)
- Infrastructure
- Tendency for businesses to innovate ‘within’ the business
- Need to share best practice!
- Broadband more important than traditional infrastructure
- Business networks
- Transplant ICT knowledge amongst business sectors
- Remove business barriers
- *Diversify towns from retail to business

**Q2**

- Travel will always be important
- There may be less rut just as important or more!
- Shortage of fuel = social habits will change
- Local food production (will this transfer to other industries)
- World shrinking, people will always want to travel
- Independence
- New technologies in transport will overcome fuel shortages
- Rail important
Q3
- Leadership
- Clear strategy
- Drive the change
- Market intervention
- Aggregate demand (critical mass)
- Business partnership
- Then ensure take-up
- ECDL in all schools
  Will technology change/help town centres
  on-line purchasing

**Topic C: SITE AND PREMISES**

**Space requirements?**
Current/further vacant space
Large stock of older space functional
Potential need for technology firms (success of Innovation Centre)
Little “oven ready” sites
Demand mostly for < 1500sq.ft. – “incubator”
Need space in short timescale
Specialist premises – meet new legislation
“Trades counter”

**Affordability**
Some potential for new quality space – emerging by Seaspace
Also need “cheap and cheerful”
Impact of Section 106 costs

**Locations**
North of Rother stronger market
Attractive live/work location
Where good broadband
Accessible to workforce

**Implications**
Promote local sourcing
Public sector role in bringing forward sites and small units
Mixed use sites
Marketing area (perception)
Step up from working at home – support services
Distribution relies on improved connections (including EU)
Work with existing firms
Live/work potential – reasons?
Strengths – sectors – environmental technology/food
Appendix 16 – Parish Planning Conference 19/10/10

Discussion Themes

Merged Group

Merged Topics (cross-selection of questions discussed from all 3 groups)

A. Employment and the Rural Economy
B. Land Management
E. Community Life & Services

Facilitators

David Marlow, Tim Hickling, James Waite, (RDC Planning Strategy & Environment)

Attendees

<table>
<thead>
<tr>
<th>Name</th>
<th>PC Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>Karen Ripley</td>
<td>Salehurst and Robertsbridge PC</td>
</tr>
<tr>
<td>Nick Ramus</td>
<td>Rye Foreign PC</td>
</tr>
<tr>
<td>Richard Farhall</td>
<td>Mountfield/Rye PC</td>
</tr>
<tr>
<td>Steve Bowen</td>
<td>Beckley PC</td>
</tr>
<tr>
<td>Michelle Thomason</td>
<td>Beckley PC</td>
</tr>
<tr>
<td>Peter Hayman</td>
<td>Northiam PC</td>
</tr>
</tbody>
</table>

A. Employment & the Rural Economy


Discussion

Rural Objectives

The strategic objectives for rural areas in Rother are:

(i) To emphasise the significant role of both villages and countryside to the character and culture of Rother.

(ii) To promote thriving, inclusive and sustainable rural communities where a high quality of life is enjoyed.

(iii) To promote a strong sense of place and of community and to encourage active and broad civic participation;

(iv) To recognise the individual distinctiveness of villages and retain and enhance their rich
cultural heritage;

(v) To reduce the need to travel by ensuring viable and accessible rural services within villages;

(vi) To promote use of public transport to larger and neighbouring settlements and to reduce reliance on the private car.

(vii) To maintain and improve the social cohesion of villages and to be more inclusive, especially in terms of access to housing;

(viii) To ensure that new development is of suitable design and quality, helps meet local needs, enhances or supports local services and community facilities and is in harmony with its setting;

(ix) to protect the open countryside for the benefit of residents and visitors

(x) To respect and conserve the historic landscape mosaic, particularly in the High Weald AONB;

(xi) To retain, support and better manage the diversity of natural habitats, including ancient woodland;

(xii) To support agriculture and foster other land-based industries;

(xiii) To foster environmental responsibility and promote environmentally sensitive land management;

(xiv) To support sustainable tourism and recreation, including improved access to the countryside;

(xv) To support local sustainable employment opportunities and the economic viability of rural communities;

| Rural Business Needs | • Conservation – OTT
• Planning does support units, and |
Evidence suggests that small workshops and office units are needed to support the rural economy. To what extent does planning policy enable/support sensitive expansion of existing sites or as part of new business or mixed use developments?

<table>
<thead>
<tr>
<th><strong>New Businesses</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>What are the priorities for types and locations of new businesses in the countryside?</td>
</tr>
<tr>
<td>• Bigger Agricultural production</td>
</tr>
<tr>
<td>• Yards – storage – fencing etc.</td>
</tr>
</tbody>
</table>
| • agricultural repairs/car repairs?

**Rural Business Locations**

The council has looked at a number of factors including to ascertain which villages appear to have a particular need for employment, including:

- unemployment,
- economic activity rate,
- ratio of in:out commuting,
- economic base,
- proximity to other urban centres

Do you agree that these factors should determine need?

The analysis has resulted in the suggestion that the following villages would benefit from employment growth.

- Broad Oak
- Camber
- Hurst Green
- Icklesham Parish including Winchelsea and Winchelsea Beach
- Northiam
- Peasmarsh
- Robertsbridge
- Sedlescombe
- Ticehurst / Flimwell area
- Westfield

Should we be particularly looking to get employment in these locations?
## Modern Business Practices

To what extent is the rural economy (including existing business viability and new business start-ups) influenced by broadband speeds?

Broadband agreed to be an issue in rural areas and would increasingly affect businesses.

<table>
<thead>
<tr>
<th><strong>To what extent should planning policy be encouraging homeworking and live/work units in rural areas? What are the pros/cons of this?</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Tourism</strong></td>
</tr>
</tbody>
</table>

What opportunities exist for the rural tourism industry to expand and/or adapt to meet changing demands and expectations, and what threats maybe associated with this?

- More self catering accommodation needed for "stay-cations"
- Concern that people could turn it into permanent residence
- Publicise the fact that buildings are kept as self catering to give clear message
- Holiday accommodation seems to be very popular and fully booked in local area
- Brings money in, give locals work
- Interest in lodges – small schemes could be ok

## B. Land Management

### Rural Objectives

The strategic objectives for rural areas in Rother are:

(i) To emphasise the significant role of both villages and countryside to the character and culture of Rother.

(ii) To promote thriving, inclusive and sustainable rural communities where a high quality of life is enjoyed.

(iii) To promote a strong sense of place and of community and to encourage active and broad civic participation;

(iv) To recognise the individual distinctiveness of villages and retain and enhance their rich cultural heritage;

(v) To reduce the need to travel by
ensuring viable and accessible rural services within villages;

(vi) To promote use of public transport to larger and neighbouring settlements and to reduce reliance on the private car.

(vii) To maintain and improve the social cohesion of villages and to be more inclusive, especially in terms of access to housing;

(viii) To ensure that new development is of suitable design and quality, helps meet local needs, enhances or supports local services and community facilities and is in harmony with its setting;

(ix) To protect the open countryside for the benefit of residents and visitors

(x) To respect and conserve the historic landscape mosaic, particularly in the High Weald AONB;

(xi) To retain, support and better manage the diversity of natural habitats, including ancient woodland;

(xii) To support agriculture and foster other land-based industries;

(xiii) To foster environmental responsibility and promote environmentally sensitive land management;

(xiv) To support sustainable tourism and recreation, including improved access to the countryside;

(xv) To support local sustainable employment opportunities and the economic viability of rural communities;
<table>
<thead>
<tr>
<th><strong>Agriculture</strong></th>
<th>Overly strict enforcement of regulations is a threat</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>What are the threats to local agricultural industry?</strong></td>
<td></td>
</tr>
<tr>
<td>The emerging Core Strategy expressly supports local agricultural enterprise and farm diversification such as farmers markets and shops. What other diversification opportunities exist, and to what extent should farm diversification be supported?</td>
<td></td>
</tr>
<tr>
<td><strong>Other land-based industries</strong></td>
<td>Agricultural repairs, timber industries such as fencing are important.</td>
</tr>
<tr>
<td>In addition to farming and agriculture, the emerging Core Strategy expressly supports land–based economic activities, including traditional woodland management and other local timber industries. Are these and other land-based industries important to the local economy, and to what extent should they be supported in the Core Strategy?</td>
<td></td>
</tr>
</tbody>
</table>
| **Equestrianism** | Increase of ‘Horsey’ culture
Part of the rural community
Stables – only use for personal use due to restrictions – could be opened up for private use (traffic issues for larger ones)
Concern over cumulative impacts |
| How can this impact (positively and negatively) on the rural landscape? Should the equestrian industry be promoted in planning policy? | |
| **Nature Conservation (ecology and habitats)** | |
| What are the priorities for nature conservation in Rother, given the richness of habitats? | |
| The Core Strategy proposes a ‘Green Network Strategy’ to identify gaps and strategic opportunities in the ecological and recreational networks. What is the advantages /disadvantages of developing a Green Network Strategy and how may it be achieved? | |
| What opportunities are there for developers to integrate biodiversity into development schemes and mitigate for any losses? | |
### Alternative Energy Generation

What opportunities for biomass exist in the District, by either
a) Woodfuel
b) Energy crops
What are the advantages and disadvantages, and to what extent is it compatible with the AONB and nature conservation designations?

What opportunities for on-shore wind power exist in the District (particularly on the Fairlight to Heathfield ridge) as highlighted in a recent RDC study? What are the advantages and disadvantages?

### Access & Leisure (i.e. footpaths, bridleways, cycleways, recreational use of countryside)

Is the potential for accessing the countryside maximised? Is the current level of access about right or is more needed?

### Landscape Character and Stewardship

How can Rother’s distinctive local landscape character best be maintained and what are the main threats and opportunities for Rother’s landscape?

### E. Community Life and Services

**Facilitators:** Tim Hickling (RDC Planning) & Nichola Watters (RDC Planning Strategy & Environment)

**Discussion**

**Rural Objectives**

The strategic objectives for rural areas in Rother are:

(i) To emphasise the significant role of both villages and countryside to the character and culture of Rother.

(ii) To promote thriving, inclusive and sustainable rural communities where a high quality of life is enjoyed.

(iii) To promote a strong sense of place and of community and to
<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>encourage active and broad civic participation;</td>
<td>(iv) To recognise the individual distinctiveness of villages and retain and enhance their rich cultural heritage;</td>
</tr>
<tr>
<td>(v) To reduce the need to travel by ensuring viable and accessible rural services within villages;</td>
<td>(vi) To promote use of public transport to larger and neighbouring settlements and to reduce reliance on the private car.</td>
</tr>
<tr>
<td>(vii) To maintain and improve the social cohesion of villages and to be more inclusive, especially in terms of access to housing;</td>
<td>(viii) To ensure that new development is of suitable design and quality, helps meet local needs, enhances or supports local services and community facilities and is in harmony with its setting;</td>
</tr>
<tr>
<td>(ix) to protect the open countryside for the benefit of residents and visitors</td>
<td>(x) To respect and conserve the historic landscape mosaic, particularly in the High Weald AONB;</td>
</tr>
<tr>
<td>(xi) To retain, support and better manage the diversity of natural habitats, including ancient woodland;</td>
<td>(xii) To support agriculture and foster other land-based industries;</td>
</tr>
<tr>
<td>(xiii) To foster environmental responsibility and promote environmentally sensitive land management;</td>
<td>(xiv) To support sustainable tourism and recreation, including improved access to the countryside;</td>
</tr>
<tr>
<td>(xv) To support local sustainable employment opportunities and the</td>
<td></td>
</tr>
<tr>
<td>Economic Viability of Rural Communities;</td>
<td></td>
</tr>
<tr>
<td>---</td>
<td></td>
</tr>
</tbody>
</table>
| **Rural Demographics** | Housing projects can incorporate work – live-work units or shops
Independent living supported
Young people need local housing and jobs
Youth facilities with new housing |
| Do any particular section of the community need policies focused on their need (e.g. policies for independent living, housing for young people)? | 
| **Services and Amenities** | Extended to pubs etc.
Garages/pubs – change of use
Concern over rates - too high to make a living from shop
Village shops/post offices – important, options need to be treated on merits
Pub and Post Office – could be put into other business use if can’t be kept |
| What are the threats to key local facilities (e.g. shops, village halls, pubs, garages)? | 
| **Services and Amenities** | 
| To what extent should the planning system seek to protect existing services and which services should be explicitly protected in planning policy? (eg the Core Strategy proposes to protect valued open space, local shops and pubs)
Can/should the policy extend to any other uses? | See above – other business uses
Affordable housing an option |
| If the loss of the key services discussed is unavoidable, what should be the priority for their re-use? | 
| **Alternative Methods of Service Delivery** | Mobile community hub – performs a social role
Need volunteers, and expect less |
| How successful have mobile services been (eg mobile GP, mobile libraries)? Does the idea of mobile services have potential to be extended to other uses? | RASP seen as good where it operates |
| How can agencies co-ordinate provision of services? (e.g. Do programmes like Action in Rural Sussex (AiRS) ‘Rural access to Services’ (RASP) programme offer a way forward? - schemes are at various stages of development in Etchingham, Camber, Westfield and Ewhurst/Staplecross) | 
| **Rural Accessibility** | 
| What can be done to change the perceptions of public transport and increase bus patronage amongst rural communities? | 
| **Big Society** |
In light of the Coalition government's 'Big Society' initiative, to what extent can the provision of community services rely on the commitment and support from individuals and community groups?

What are the main areas in which the community could take on more responsibility (e.g. community transport)?

**Community Life**

Is there anything more the local planning authority could do to promote community life through the Local Development Framework?

### Discussion Themes

C. **Housing Issues in the Rural Area**

**Facilitators**

Roger Comerford, Graham Fifield (RDC Planning Strategy & Environment)
Kieran O’Leary (RDC Housing)

**Attendees**

<table>
<thead>
<tr>
<th>Name</th>
<th>PC/PCG</th>
</tr>
</thead>
<tbody>
<tr>
<td>Beryl Bodey</td>
<td>Catsfield PC</td>
</tr>
<tr>
<td>R. Hollman</td>
<td>Peasmarsh PC</td>
</tr>
<tr>
<td>Paul Gilbert</td>
<td>Etchingham PC</td>
</tr>
<tr>
<td>Paul Brown</td>
<td>Guestling PC</td>
</tr>
<tr>
<td>Barbara Balkham</td>
<td>Westfield PC</td>
</tr>
<tr>
<td>1 other anon.</td>
<td></td>
</tr>
</tbody>
</table>

### C. Housing Issues in the Rural Area

Facilitators: Roger Comerford, Graham Fifield (RDC Planning Strategy & Environment) & Kieran O’Leary (Housing)

**Discussion**

The wording of the two relevant objectives is considered to be a good sum as they stand.
quality of life is enjoyed.

(iii) To promote a strong sense of place and of community and to encourage active and broad civic participation;

(iv) To recognise the individual distinctiveness of villages and retain and enhance their rich cultural heritage;

(v) To reduce the need to travel by ensuring viable and accessible rural services within villages;

(vi) To promote use of public transport to larger and neighbouring settlements and to reduce reliance on the private car.

(vii) To maintain and improve the social cohesion of villages and to be more inclusive, especially in terms of access to housing;

(viii) To ensure that new development is of suitable design and quality, helps meet local needs, enhances or supports local services and community facilities and is in harmony with its setting;

(ix) To protect the open countryside for the benefit of residents and visitors

(x) To respect and conserve the historic landscape mosaic, particularly in the High Weald AONB;

(xi) To retain, support and better manage the diversity of natural habitats, including ancient woodland;

(xii) To support agriculture and foster other land-based industries;

(xiii) To foster environmental responsibility and promote
| Environmentally sensitive land management;  
(xiv) To support sustainable tourism and recreation, including improved access to the countryside;  
(xv) To support local sustainable employment opportunities and the economic viability of rural communities; |  |
|---|---|
| **Housing Need**  
What issues are there with regard to housing need in the rural areas?  
What affect is this having on rural communities? | More local decision making  
Low cost housing for young people  
Bigger picture – transport services  
Low income population- older people – downsizing |
| **Housing Distribution**  
Rother District Council has thoroughly examined potential for housing development in and around the villages in the Strategic Housing Land Availability Assessment (SHLAA) which recognises significant constraints. However, is there more potential for housing in the countryside and small hamlets? | Evidence that local people had farm conversions turned down  
Government announcement – shift in policy today  
Lead to strain on infrastructure? |
| **Affordable Housing**  
There is a current requirement of 40% affordable housing on all developments of 5 dwellings or more in rural areas. There are various proposals to increase the supply, namely;  
- A 50% requirement  
- Requiring all developments of 3 or 4 dwellings to also provide one affordable dwelling.  
- Lowering the threshold to 3  
- Commuted sums – requiring all housing developments of less than 5 to make a financial contribution towards affordable housing.  
What are the relative merits of these proposals | 50% - shifts socio-economic balance – happier on smaller scale developments than larger sites  
In-migration of older groups.  
Need young people – else schools close  
Gap in affordability is so great that once they get an AH, residents will effectively be stuck in village.  
% could be based on individual community need - may be appropriate to some villages but not others. |
### Allocations Solely or substantially for affordable housing in rural areas

A complementary policy in support of exception sites may be to allocate small sites in the Local Development Framework solely or substantially (perhaps 70 or 80%) for affordable housing. These sites would be incorporated within the development boundary. What may be the advantages/disadvantages of such a policy? If such a policy were adopted, should it be applied only in villages of particular housing need?

| Should a size threshold be applied to affordable housing sites /exception sites and if so what threshold? (e.g. 10 dwellings, 15 dwellings) | Support a threshold. It will avoid ‘them and us’ situation and avoid over-concentrations of AH. Phasing is important. |

### Key workers

Nationally, certain categories of ‘key worker’ *(including teachers, nurses, police service, fire service, etc) may in some circumstances have preferential access to affordable housing.

Local authorities can also have a local definition of key workers. Rother District Council has considered a local definition of ‘key workers’ that includes all persons who provide an essential service to the local and wider community. These may include care workers, postal workers, milk deliverers, shop workers and those who work in the tourism industry, but also extremely localised workers such as farmers and other land-based workers. Would it be a good idea to have this local key worker policy?

| Relative priority in register? | Risk that everyone may be defined KW – depends on parish and also on uptake of national definition. A Local definition favours local community vis-à-vis national definition. |

### Housing Mix

Current planning policy requires 30% one or two bed properties on all new housing developments district wide. To what extent would this policy help meet local needs?

| Housing can still be extended – so problem remains. Style of property is problem = small rooms Level of AH affects viability. |
| Other Matters | Space standards are a concern. Modern developments have rooms that are too small. |

**Discussion Themes**

**D. Development in the Countryside**

**Facilitators**

Facilitators: Roger Scott, Richard Wilson & John McSweeney (RDC Planning Development Control)

**Attendees**

<table>
<thead>
<tr>
<th>Name</th>
<th>PC</th>
</tr>
</thead>
<tbody>
<tr>
<td>Richard Comotto</td>
<td>Icklesham PC</td>
</tr>
<tr>
<td>Lynda Hollman</td>
<td>Peasmarsh PC</td>
</tr>
<tr>
<td>Bernard Baverstock</td>
<td>Beckley PC</td>
</tr>
<tr>
<td>Roger Burfoot</td>
<td>Ashburnham and Penhurst PC</td>
</tr>
<tr>
<td>Neville Davis</td>
<td>Salehurst and Robertsbridge PC</td>
</tr>
<tr>
<td>John Marland</td>
<td>Sedlescombe PC</td>
</tr>
</tbody>
</table>

**D. Development in the Countryside**

**Discussion**

**Rural Objectives**

The strategic objectives for rural areas in Rother are:

(i) To emphasise the significant role of both villages and countryside to the character and culture of Rother.

(ii) To promote thriving, inclusive and sustainable rural communities where a high quality of life is enjoyed.

(iii) To promote a strong sense of place and of community and to encourage active and broad civic participation;

(iv) To recognise the individual distinctiveness of villages and
retain and enhance their rich cultural heritage;

(v) To reduce the need to travel by ensuring viable and accessible rural services within villages;

(vi) To promote use of public transport to larger and neighbouring settlements and to reduce reliance on the private car.

(vii) To maintain and improve the social cohesion of villages and to be more inclusive, especially in terms of access to housing;

(viii) To ensure that new development is of suitable design and quality, helps meet local needs, enhances or supports local services and community facilities and is in harmony with its setting;

(ix) to protect the open countryside for the benefit of residents and visitors

(x) To respect and conserve the historic landscape mosaic, particularly in the High Weald AONB;

(xi) To retain, support and better manage the diversity of natural habitats, including ancient woodland;

(xii) To support agriculture and foster other land-based industries;

(xiii) To foster environmental responsibility and promote environmentally sensitive land management;

(xiv) To support sustainable tourism and recreation, including improved access to the countryside;

(xv) To support local sustainable employment opportunities and the economic viability of rural communities;

<table>
<thead>
<tr>
<th><strong>Countryside Character</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>What aspects of countryside character is it desirable to preserve, and what can or Dispersed settlements based on non-agricultural development</td>
</tr>
</tbody>
</table>
### How to Respond

<table>
<thead>
<tr>
<th>Vulnerability – complete infilling</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rural character – opposed to urbanisation</td>
</tr>
<tr>
<td>River valleys, field patterns, rural employment (archaeology – include in main objective)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>What types of development have positive or negative impacts on the character of the countryside?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Affordable housing for young in villages</td>
</tr>
<tr>
<td>Sympathetic reuse of rural buildings</td>
</tr>
<tr>
<td>Improvements to public transport - …. Link rail</td>
</tr>
<tr>
<td>Negative -Suburbanisation</td>
</tr>
<tr>
<td>Wind farms – phone masts</td>
</tr>
</tbody>
</table>

### Equestrian Development

<table>
<thead>
<tr>
<th>Lack of facilities in east</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lack of bridle paths (use of disused routes)</td>
</tr>
<tr>
<td>Mobile stables not requiring planning</td>
</tr>
<tr>
<td>Equestrian equipment</td>
</tr>
<tr>
<td>Management of change of use to equestrian (conditions)</td>
</tr>
<tr>
<td>Design of build quality of stables etc., fences</td>
</tr>
</tbody>
</table>

### Re-Use of Redundant farm buildings

<table>
<thead>
<tr>
<th>Definition of historic – non viable for agriculture</th>
</tr>
</thead>
<tbody>
<tr>
<td>Damage of additional structures (sheds, garages) with conversion into residential</td>
</tr>
<tr>
<td>• business use preferred option over residential</td>
</tr>
<tr>
<td>• affordable housing rather than second homes</td>
</tr>
<tr>
<td>• supply/demand</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Is the general order of priority for re-use correct? Should affordable housing be prioritised over market housing for re-use?</th>
</tr>
</thead>
</table>

### Discussion:

<table>
<thead>
<tr>
<th>Reaching the limits</th>
</tr>
</thead>
</table>

### Dwellings in the Countryside

<table>
<thead>
<tr>
<th>Discussion: pressure to extend curtilages – tennis courts etc, enclose with garden – lawns</th>
</tr>
</thead>
<tbody>
<tr>
<td>PPS7 – agricultural dwellings</td>
</tr>
<tr>
<td>Lifting of agricultural conditions Loss of agricultural dwellings</td>
</tr>
<tr>
<td>Retain strict countryside policies</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Discussion:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Destroy character of hamlets</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Is there a continuing supply of redundant agricultural buildings appropriate for conversion?</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Is there more potential for housing in the countryside and in small hamlets?</th>
</tr>
</thead>
</table>

### Discussion:
<table>
<thead>
<tr>
<th>Exception sites, which reinforces character</th>
<th>Camping &amp; Caravan sites – touring and static</th>
</tr>
</thead>
<tbody>
<tr>
<td>Good designs</td>
<td>How can these be managed to ensure</td>
</tr>
<tr>
<td>Very limited</td>
<td>countryside character is maintained?</td>
</tr>
<tr>
<td></td>
<td>Pressure from further developments associated</td>
</tr>
<tr>
<td></td>
<td>with camp sites</td>
</tr>
<tr>
<td></td>
<td>Can conditions be enforced?</td>
</tr>
<tr>
<td></td>
<td>Caravans can be removed but permanent</td>
</tr>
<tr>
<td></td>
<td>structures cannot (service building/manager</td>
</tr>
<tr>
<td></td>
<td>accommodation).</td>
</tr>
<tr>
<td></td>
<td>Not amongst camping sites (tents)</td>
</tr>
</tbody>
</table>
Appendix 17: Documents available for Inspection as part of the Proposed Submission Consultation

<table>
<thead>
<tr>
<th>Document Type</th>
<th>Detailed Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Affordable Housing background paper</td>
<td>Battle Town Study and appendices</td>
</tr>
<tr>
<td>Bexhill Town Study and appendices</td>
<td>Consultation Statement</td>
</tr>
<tr>
<td>District-wide Shopping Assessment</td>
<td>Equalities Impact Assessment</td>
</tr>
<tr>
<td>Green Infrastructure Study</td>
<td>Gypsy, Traveller and Travelling Showpeople background paper</td>
</tr>
<tr>
<td>Habitat Regulations Assessment (HRA) including separate reports for hydrology and air quality</td>
<td>Screening Report for all international nature conservation sites, and updated Screening Report on the Hastings Cliffs SAC</td>
</tr>
<tr>
<td>Screening Report on the Hastings Cliffs SAC</td>
<td>Hastings Fringes background paper</td>
</tr>
<tr>
<td>Hastings and Rother Strategic Housing Market Assessment Update 2009/10</td>
<td>Housing Needs Study 2005</td>
</tr>
<tr>
<td>Housing Strategy 2007 to 2012</td>
<td>Infrastructure Delivery Plan (IDP)</td>
</tr>
<tr>
<td>Landscape Assessments</td>
<td>Low Carbon &amp; Renewable Potential Study</td>
</tr>
<tr>
<td>Open Space, Sport &amp; Recreation Audit and Assessment</td>
<td>Overall Housing Provision in Rother District background paper</td>
</tr>
<tr>
<td>Rother District Affordable Housing Viability Assessment 2010</td>
<td>Rye and Rye Harbour Study and appendices</td>
</tr>
<tr>
<td>Rural Settlements Study</td>
<td>Strategic Flood Risk Assessment</td>
</tr>
<tr>
<td>Strategic Housing Land Availability Assessment (SHLAA)</td>
<td>Urban Options Background Paper</td>
</tr>
</tbody>
</table>

All these documents (including the Proposed Submission Core Strategy) were also available to purchase.
Appendix 18: Copy of Public Notices placed in Battle, Bexhill, Rye and Hastings Observers, 19th August 2011 & 30th September 2011

Extract from Battle Observer – 19th August 2011

Extract from Bexhill Observer – 19th August 2011

Extract from Rye Observer – 19th August 2011
HOW TO RESPOND

Extract from Hastings Observer – 19th August 2011

Extract from Battle Observer – 30th September 2011
HOW TO RESPOND

Extract from Bexhill Observer – 30th September 2011

Extract from Rye Observer – 30th September 2011
Extract from Hastings Observer – 30th September 2011
Deadline nears for strategy comments

TIME is running out for people living in Rother to comment on the district council’s proposed core strategy.

Once approved, the strategy will form part of a new local development framework to replace the current local plan, guiding development decisions from now until 2030.

The deadline for representations is just a week away - Friday September 30 - and in a bid to highlight the proposals within their own Bexhill wards, Independent councillors Stuart Earl, John Lee and Tony Manl organised and funded their own public meeting on September 15.

Because of the tight deadline on consultations, some who attended have pressed councillors to seek a further month’s grace for people wishing to comment.

Principally aimed at people in Collington and St Marks, the meeting’s key speaker was

David Marlow, Rother’s planning strategy and environmental manager, who said that he wanted to allay rumours and scaremongering about what the proposed core strategy seeks to achieve.

Three copies of the 260-page plus document are available at the public library in Western Road, Bexhill, and can also be found on the council’s web page at www.rother.gov.uk.

The meeting heard that it was vital local people became familiar with the document and made their views on its contents known to the council as soon as possible.

The Bexhill-Hastings link road and suggestions for a railway station serving Bexhill’s Riverside Retail and Leisure Park are among issues which could have significant effects in the next 15 years or so.
Deadline for public concerns extended

FORMAL representations to Rother District Council's Core Strategy can now be made up to November 11.

The council has extended the period in response to public concerns that more time is needed for people to fully consider the Proposed Submission Core Strategy and supporting documents.

The Core Strategy is the council’s long-term vision and strategy for development in the district.

The document contains plans for 3,700 to 4,300 new homes to be built across the district up to 2026, somewhat less than previously envisaged.

Although suggesting housing numbers for settlements, the document does not suggest specific sites.

It also deals with strategic planning for jobs, communities, the environment, and infrastructure requirements.

The council’s director of services, Tony Leonard, said, “It is vital for the proper planning of the district that we have an up-to-date development strategy in place as soon as possible, but it is also important that local people can contribute to this.

Therefore, while the Core Strategy already takes into account comments made during earlier consultations, further time is being allowed for local people and organisations to make formal representations, either of support or objection, to the soundness of the plan.

“Representations that have already been made will remain valid.” Copies of the Core Strategy and its supporting documents can be viewed online at www.rother.gov.uk/corestrategy or at the council’s Community Help Points (CHPs).

At this formal stage in the process, representations must be made either using the council’s online consultation system or in writing using the prescribed form.

A Consultation Help Note has been produced to guide people through the process, and this is also available online and at the CHPs.

Anyone who still has difficulty can get advice and assistance by telephoning 01424 726655.

All representations must be received by 4:30pm on Friday 11 November 2011 to be accepted.
Rother District Council – Core Strategy

Rother District Council is now inviting comments on the 'soundness' of its final draft of the Core Strategy – the Proposed Submission version. It is the final opportunity to comment on the Plan before it gets submitted to the Secretary of State for Examination by an Independent Inspector. You can view the documents and make your comments online at http://www.rother.gov.uk/corestrategy

For further information, please contact the Planning Strategy team at Rother on 01424 787655, or email planning-strategy@rother.gov.uk.
Appendix 19 – Minutes from Rother District Council Cabinet – 14/05/12

Rother District Council

CABINET
14 May 2012

Minutes of the Cabinet meeting held at the Town Hall, Bexhill-on-Sea on Monday 14 May 2012 at 11:00am.

Cabinet Members present: Councillors C.R. Maynard (Leader), A.E. Ganly, Mrs B.A. George, I.G.F. Jenkins, J.M. Johnson, M.J. Kenward, R.H. Patten and R. White.

Other Members present: Councillors A.E. Davies, S.D. Elford, R.V. Elliston (in part), Mrs J.M. Hughes, B. Kentfield, P.G. Lendon, M. Mooney, Mrs S.M. Prochak and M.R. Watson.

Advisory Officers present: Chief Executive, Director of Resources, Director of Services, Head of Planning, Head of Housing (in part), Head of Regeneration, Principle Planning Officer, Parks & Leisure Services Manager (in part) and Democratic Services Officer.

Also present: Jane Porter, Regional Director, AmicusHorizon (in part).

Also present: 1 member of the public.

Publication Date: 16 May 2012
The decisions made under PART II will come into force on 24 May 2012 unless they have been subject to the call-in procedure.

CB11/132. CORE STRATEGY SUBMISSION AND FOCUSED AMENDMENTS
(7.3)
In February 2012 Cabinet had deferred the decision on the Core Strategy pending a decision on the Bexhill to Hastings Link Road. The funding for the Link Road had now been agreed and the report had been bought before Members to enable the Core Strategy submission and focused amendments to be considered.

The report detailed the main issues that had been raised through representations and highlighted changes to planning policy that were significant in relation to the Core Strategy; these were the publication of the new National Planning Policy Framework (NPPF), the enactment of provisions of the Localism Act and the publication of associated new Regulations.
Six hundred and eighty (680) representations had been received; two-thirds were in relation to spatial strategies with the ‘Overall Spatial Strategy’ attracting most objections and the Economy Chapter received most reaction. Details of the main objections and considerations given to the objections were appended to the report for consideration.

An assessment had been carried out on the overall conformity of the Core Strategy with national and regional policies. This included the NPPF, and as a result of the assessment and the objections made, it was considered appropriate for some amendments to the Core Strategy. The focused amendments were detailed within the report for consideration.

It was recognised that progression of the Core Strategy to adoption was important in order to provide an effective basis for more detailed plans and for decision making.

Following consultation with the Planning Inspectorate it was considered that the most appropriate course of action would be to submit the Core Strategy incorporating the focused amendments and commence a simultaneous consultation for 6 weeks. Whilst this approach would enable an opportunity for response, it would not re-open consultation on the Core Strategy as a whole, enabling the examination to proceed as soon as possible.

**RECOMMENDED:** That:

1) the Core Strategy, incorporating the ‘focused amendments’ at (2) below be submitted for independent examination, together with the updated Consultation Statement, Sustainability Appraisal, other supporting documents and copies of duly-made representations;

2) the ‘focused amendments’ contained in Appendix 2 to the report be published in parallel with submission of the Core Strategy for a 6 week period for representations, and that any duly-made representation be forwarded to the Inspector appointed to conduct the examination; and

3) the Chief Executive be authorised to publish the submitted version of the Core Strategy, including the focused amendments and other, non-material changes as soon as practicable.

(Councillor Mrs Prochak declared a personal interest in this matter in so far as she is a Member of the Robertsbridge Enterprise Group and her husband is the Chairman of the Robertsbridge Enterprise Group and in accordance with the Members’ Code of Conduct, remained in the room during consideration thereof)

These minutes can also be found at [http://www.rother.gov.uk/media/pdf/o/0/cb120514_-_Signed_Copy.pdf](http://www.rother.gov.uk/media/pdf/o/0/cb120514_-_Signed_Copy.pdf)
Appendix 20 – Copy of Public Notice to be inserted in Battle, Bexhill and Rye Observers (15th June 2012) advertising the 6-week public consultation.