Core Strategy

Consultation on
Strategy Directions

Interim Consultation Document

November 2008

www.rother.gov.uk/corestrategy
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1 INTRODUCTION

Background

1.1 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.

1.2 The Core Strategy document will set out the vision and general distribution of development within the District up to 2026. 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.

1.3 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, which has been completed 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.

1.4 Preparation of the Core Strategy has now reached the ‘strategic directions’ stage, where choices for the vision, objectives, spatial strategy and broad locations for development have been refined, following consideration of the representations received at the Issues and Options stage.

1.5 The Council is about to embark on the next phase of public and stakeholder consultation and the responses will further assist in the refinement and choosing of options, as well as creating an opportunity for the raising of other matters for consideration. 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 has decided that further public consultation on its emerging strategy is vital to ensure that it duly reflects specific local needs and priorities, as well as conforming with its adopted Statement of Community Involvement.

Purpose of interim Consultation Statement

1.6 This document sets out Rother District Council’s engagement with stakeholders and the community in the preparation of the Core Strategy Issues and Options report, as well as earlier stakeholder engagement on the Core Strategy, 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.

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1 Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008
1.7 In due course, the final consultation statement as required under Regulation 30 will set out the consultation arrangements and responses to the Core Strategy Consultation on Strategy Directions under Regulation 25, and this will accompany the submission of the Core Strategy to the Secretary of State.

Statement of Community Involvement

1.8 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

1.9 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.

1.10 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)

1.11 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:*

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

2. consultation will be based on openness, trust, integrity and mutual respect for all participants
3. where appropriate consultation will be used to seek views before decisions are made

4. requests to consult may come from inside or outside the Council

5. consultation will seek to involve all parties who can contribute to or who are affected by the outcome of consultation

6. 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

7. 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

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

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

10. 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**

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

1. Evidence gathering - *Completed*
2. Consultation on Core Strategy Issues and Options – *Completed October 2006*
3. Consultation on Strategy Directions – *November 2008 – January 2009*
4. Submission of Core Strategy and Representations to Secretary of State for independent examination – *expected to be published in Summer 2009*
5. Examination and publication of Binding Inspectors Report – *Potentially Spring 2010*
6. Adoption of Core Strategy – *Potentially Winter 2010*
2. **CONSULTATION**

**Early stakeholder engagement**

2.1 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 will follow. The consultees for the subsequent Issues & Options stage are set out in broad terms in the LDF Regulations.

2.2 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**

2.3 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**

2.4 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

**Consulting on the ‘Issues and Options’ document**

2.5 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. The ‘Issues and
Options’ document was at this stage a product of the now superseded PPS;12 Local Development Frameworks.

2.6 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.

2.7 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, including consultation with local organisations and groups as well as via a ‘residents questionnaire’ to be based on the issues and options contained in the document. Also it was resolved that presentational and other editorial amendments be made, to make the document as accessible as possible.

2.8 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).

2.9 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

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

\textbf{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.

\footnote{Town and Country Planning (Local Development) (England) (amendment) Regulations 2008.}
Planning Agents Forum – 23rd 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
A short written exhibition with an officer present to answer questions. (The issues and Options document had previously been circulated to Forum members)

2.11 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.

2.12 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

Consultation documents

2.13 The ‘Issues and Options’ consultation documents, 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.
• A Residents questionnaire – The purpose of which was to gain an understanding of the priorities of local people, to inform the emerging planning strategy.

**How did we consult?**

**The Issues and Options discussion document**

2.14 This 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.

2.15 Although comments could be made in respect of any aspect of the document, it contained 21 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.

2.16 The Issues and Options document was free of charge.

**Electronic consultation**

2.17 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.

2.18 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.

2.19 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.

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

2.21 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.

2.22 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.

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

**Rother in Profile**

2.24 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 Issues 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?

2.25 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**

2.26 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.

2.27 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**

2.28 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.

2.29 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?**

2.30 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**
2.31 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?

The Issues and Options main document

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

2.33 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 been addressed?

The Issues and Options Document

2.34 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

2.35 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.

2.36 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.

2.37 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**

3.1 As can be seen, the Strategy Directions Document has been produced following wide consultation of the Issues and Options document and interpretation of the subsequent representations received.

3.2 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.

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

3.4 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.

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

3.6 In addition, the Chairman and Clerk (or substitutes) of all the Parish Councils were invited to a workshop on the 8th or 9th July 2008, 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.

3.7 The formal consultation period for the ‘Consultation on Strategy Direction’ document commenced on November 7th 2008 for a twelve week period, ending on January 30th 2009.

**How did we consult?**

‘Consultation on the Strategy Directions Document’

3.8 The document is 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.

3.9 To make the information within the main document accessible, an A4 8 sided summary leaflet has also been produced which introduces and gives a broad
outline of the ‘Consultation on Strategy Directions’ document. This also has been sent to a range of interest parties identified in the SCI.

Electronic consultation

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

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

3.12 A dedicated email address (planningstrategy@rother.gov.uk) and web page (www.rother.gov.uk/corestrategy) are available and have been advertised in the main document and summary leaflet.

3.13 Comments on the document are being invited by letter, email or on-line.

Exhibitions

3.14 To help local people consider the proposals, a series of exhibitions across the district have been proposed on the following dates and venues:

**Exhibition programme for the Strategy Directions document**

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

3.15 All exhibitions will run from 2.30 – 7.30pm apart from the Pavilion venue on the 28<sup>th</sup> November which is to take place from 10.00 – 4.00pm.

Background Papers

3.16 A number of background papers have been 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)
• Employment Strategy and Land Review
• Urban Options Background Paper

3.17 These evidence studies are available on the Council’s website.

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

3.18 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.

3.19 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 East.²

3.20 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.

3.21 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.

3.22 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 throughdesignating and protecting Key Sites.

3.23 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.

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

² It is noted that English Nature and the Countryside Agency have now been replaced by Natural England.
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
- *Countryside Agency* [Now Natural England]
- *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
## Appendix 2 - August 2006 Consultation on SA Scoping Report

<table>
<thead>
<tr>
<th>Comment</th>
<th>Response</th>
<th>Where in Report</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Question 1</strong> Are there any other documents or sustainable development objectives relevant to this report?</td>
<td>CA: High Weald AONB Management Plan Included in PPPSI Review Appendix 1</td>
<td></td>
</tr>
<tr>
<td><strong>Question 2</strong> Are you aware of any inaccuracies in the baseline data presented?</td>
<td>EA: Improve baseline by further explanation. Graphs/tables have no explanation and data source not identified The “Rother in Profile” spatial portrait that has been used as the baseline has this information</td>
<td>Appendix 2</td>
</tr>
<tr>
<td><strong>Question 3</strong> Do you agree that the baseline data collected is relevant to the Core Strategy DPD?</td>
<td>EA: Add Water Framework directive and associated indicators. Also EA ‘State of the Environment’ report. Both reviewed as part of PPPSI review and targets identified.</td>
<td>Appendix 1</td>
</tr>
<tr>
<td><strong>Question 4</strong> Are you aware of any additional baseline data that should be included?</td>
<td>CA: Add more details on the quality and quantity of the networks of cycle routes and footpaths, open spaces and energy consumption 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” Updated Spatial Portrait (Pending)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>EA: 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. 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 Table 4, Section 5</td>
<td></td>
</tr>
<tr>
<td></td>
<td>EA: 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. 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 Table 4, Section 5</td>
<td></td>
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<tr>
<td></td>
<td>EA: Climate Change Potential impacts of climate change Additional information on climate change will be presented in the Updated Spatial</td>
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<tr>
<td><strong>Question 5</strong> Do you agree with the main sustainability issues identified?</td>
<td></td>
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<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>
</tr>
</tbody>
</table>

| **Question 6** Are there any issues that should be added or removed? |
|-----------------------------|-------------------------------------------------|----------|
| **EA** | 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. | Monitoring of commercial and industrial waste streams from varying sources is a county level issue. Information on waste collected for composting and that going to landfill is available at the local level and indicators have been added to the framework to take account of this. | Table 4, Section 5 |

| **Question 7** Do you agree with the focus and direction of the sustainability objectives? |
|-----------------------------|-------------------------------------------------|----------|
| **CA** | Reference to achieving high quality of design that respects and enhances local distinctiveness is required | Reference to the quality of the built environment is considered to be covered by objective 15. A DPD or SPD objective could include design and local distinctiveness matters where appropriate. There is also the underlying assumption that all new development will be of a high quality design | Table 4, Section 5 |
| EA | Objective 19 deals with water quality and water resources. This should be made into two distinct objectives. | Agreed. Revised SA Framework Objectives 12 and 13 | Table 4 Section 5 |
| EA | Objectives should be strengthened by the inclusion of more specific indicators. | Agreed. Additional specific indicators in framework | Table 4 Section 5 |

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

<p>| CA | Approve of use of Landscape Character Assessment. Landscape quality should also be used. Indicators on design should also be developed. | Noted | Table 4 Section 5 |
| CA | Develop indicators on the accessibility to the countryside, open spaces i.e., distance of households from open spaces, length of undisturbed footpaths/cycle routes, net gain and level of use of open spaces. | 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. | Table 4 Section 5 |
| EA | Objective 1 – add number of houses built to Ecohomes / Breeam / other efficiency standards. | This information is not available. Propose to consider the future monitoring of homes built to Code for Sustainable Home standards. | Not available |
| EA | 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. | 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. | Table 4 Section 5 |
| EA | 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. | Indicators covering condition of SSSIs, number and area of SNCIs and national and internationally designated sites and ancient semi-natural woodland. | Table 4 Section 5 |
| EA | 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 | 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. | Table 4 Section 5 |
| EA | Objective 19 – More indicators suggested relating to water quality of the District’s rivers and coastline. | Water quality Objective 13 – associated indicators now include water quality of rivers and the sea | Table 4 Section 5 |
| EA | Objective 20 – additional indicators relating to sustainable water resources management. | Water quality Objective 13 – associated indicators now include water consumption per | Table 4 Section 5 |</p>
<table>
<thead>
<tr>
<th>Question 9 Are you able to provide data on biodiversity or drinking water quality?</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>EA</strong></td>
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</table>
## 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>The Environment Agency – email response from Claerwyn Hughes (17.01.08)</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>English Heritage – email response from Alan Byrne Historic Areas &amp; Planning Adviser Kent &amp; East Sussex Team (08.02.08)</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>Natural England – formal letter (emailed) response from Rebecca Pearson Environmental Planning Advisor (08.02.08)</td>
<td></td>
<td></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).

| 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. Key messages from context review now revised to read: “Protect the historic environment and landscape” | Table 3 |
| 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). | 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 |
| 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. Again no clear mention is made in this section of AONBs and landscape designations. Natural | Amended accordingly | Appendix 1 |
| | PPS9 makes no reference to AONB or landscape | N / A |

24
<table>
<thead>
<tr>
<th>England advises that this is revised.</th>
<th>Appendix 2 Baseline</th>
</tr>
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<tbody>
<tr>
<td><strong>Page 51</strong></td>
<td></td>
</tr>
<tr>
<td>2 Improve the health and well-being of the population and reduce inequalities in health</td>
<td></td>
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<tr>
<td>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>
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<tr>
<td><strong>Page 56</strong></td>
<td></td>
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<tr>
<td>14 Conserve and enhance biodiversity</td>
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</tr>
<tr>
<td>This should include Local Nature Reserves within Rother District, BAP habitats and species, and protected species.</td>
<td></td>
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<tr>
<td>15 Protect and enhance the high quality natural and built environment</td>
<td></td>
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<tr>
<td>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.</td>
<td></td>
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<tr>
<td><strong>Sustainability Appraisal Framework for the assessment of Rother Core Strategy.</strong></td>
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</tr>
<tr>
<td>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.</td>
<td></td>
</tr>
<tr>
<td>Indicators for this section could include Natural England’s recommends that people living in towns and cities should have:</td>
<td></td>
</tr>
<tr>
<td>• An accessible natural green space less than 300 metres (in a straight line) from home</td>
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</tr>
<tr>
<td>• Statutory Local Nature Reserves provided at a minimum level of one ha per thousand people</td>
<td></td>
</tr>
<tr>
<td>• At least one accessible 20 ha site within 2km of home; one accessible site within 5km of home; and one accessible site of 500 ha within</td>
<td></td>
</tr>
<tr>
<td><strong>Appendix 2</strong></td>
<td></td>
</tr>
<tr>
<td>Reference now made to access to natural and semi-natural open/green space</td>
<td></td>
</tr>
<tr>
<td>Sussex Biodiversity Records Centre monitors BAP species and habitats</td>
<td></td>
</tr>
<tr>
<td>Related indicators under biodiversity objective serve as proxy for AONB state of health e.g. stock of ancient woodland and loss of hedgerows</td>
<td></td>
</tr>
<tr>
<td><strong>Appendix 2</strong></td>
<td></td>
</tr>
<tr>
<td>N / A</td>
<td></td>
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<tr>
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<td></td>
</tr>
<tr>
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<td>• At least one accessible 20 ha site within 2km of home; one accessible site within 5km of home; and one accessible site of 500 ha within</td>
<td></td>
</tr>
<tr>
<td><strong>SuDS not always</strong></td>
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</table>
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.

| applicable/appropriate to every development. Notwithstanding this SuDS encouraged in new development. Monitoring maybe picked up through Code for Sustainable Homes monitoring. | Duly noted. Statement received. |
| Monitoring framework needs to be manageable and realistic. | Duly noted. |
| Duly noted. | Amended accordingly |
| Table 4 SA Framework | Various as above |
| Duly Noted and amendments through report as above | |
## 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 Bewick Swan has been identified as a qualifying species but the SPA is designated for a number of species, only one of which is the Bewick 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>
</tbody>
</table>
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.

Protected Species outside the SAC
Natural England requires further clarification as to the inference that there will be no impact on protected 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.

Page 51 Impact on Protected Species outside the Protected Site

Again Natural England would require clarification of the nature of the proposed development sites and 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.

---

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]
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/fluvial 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 subsidiary 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 high quality but are the only available. In those circumstances the objectives should be to improve provision.

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 then 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 2km of home; one accessible site of 100ha within 5km of home and one accessible site of 500ha within 10km 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 timeframe, 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”

<table>
<thead>
<tr>
<th>How responses have been addressed in the Strategy Directions Document</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>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.</strong></td>
</tr>
<tr>
<td><strong>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.</strong></td>
</tr>
<tr>
<td><strong>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.</strong></td>
</tr>
<tr>
<td><strong>New sections now on Infrastructure and Implementation to address concerns over delivery of infrastructure.</strong></td>
</tr>
<tr>
<td><strong>Specific reference to ‘young’ and ‘old’ persons added to ensure balance of service provision.</strong></td>
</tr>
<tr>
<td><strong>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.</strong></td>
</tr>
<tr>
<td><strong>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.</strong></td>
</tr>
<tr>
<td><strong>Under the Communities section, objectives include:</strong></td>
</tr>
<tr>
<td>- ensure ease of access to doctors surgeries</td>
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<tr>
<td>- encourage more young people to stay, return or be attracted to Rother as a place to live and work</td>
</tr>
<tr>
<td><strong>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.</strong></td>
</tr>
</tbody>
</table>
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 lifestyles”.

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 to 19 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' 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 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]
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. Etchingam 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
HOW TO RESPOND

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]
- Rye Town Council (Mr. Richard Farhall) [4956]
- Rye Conservation Society (Mr. K.R.F. Bird) [4962]
- Croudace Strategic Limited [4967]
- Rastrum Ltd. [4973]
- Mr. A Miskin [4975]
- Mr. B.R Streat [5005]
- Bexhill and District Gardens & Allotments Society (Mr. C.R Bryen) [5009]
- PREM (Rooster) Limited (Mr. Richard Thomas) [5011]
- East Sussex County Council (Mr. Nick Claxton) [5015]
- Rother Homes (Mr. Tony Streeter) [5034]
- Rother Environmental Group (Mr. Dominic Manning) [5045]
- The National Trust (Ms. Jane Arnott) [5052]
- Forestry Commission (Ms. Jane Hull) [5056]
- Strutt & Parker (Mr. Craig Noel) [5058]
- Rother Voluntary Action (Mr. M.J. Fisher) [5067]
- Natural England (Mr. Kristoffer Hewitt) [5088]

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]
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.

Councills 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 Council 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.

How responses have been addressed in the Strategy Directions Document

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.

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.

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.

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.

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.
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]
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]
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 it 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.*

*Waste issues dealt at County level in Minerals and Waste Local Plan (to be replaced by Waste and Minerals Development Framework). Recycling dealt*
How to respond within Policy Directions document under Sustainable resource management.

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

Councillors
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]
- Learning and Skills Council (Mr. Paul Stoggles) [4948]
- 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]
- 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]
- Home Builders Federation (Mr. Bart Wren) [5017]
- Crown Estates [5030]
- Rother Homes (Mr. Tony Streeter) [5034]
- The National Trust (Ms. Jane Arnott) [5052]
- Strutt & Parker (Mr. Craig Noel) [5058]
- Mr. David Vereker [5065]
- Rother Voluntary Action (Mr. M.J Fisher) [5067]

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]
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 rise 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.

Individuals
The general consensus of the individuals is for scenario C. One individual would prefer a status quo with more flats.

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.

Councils

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]
- Croudace Strategic Limited [4967]
- Bexhill and District Gardens & Allotments Society (Mr. C.R Bryen) [5009]
- Rother Homes (Mr. Tony Streeter) [5034]
- Bali (Mr. Nick Hollington) [5054]
- Mr. David Vereker [5065]
- Rother Voluntary Action (Mr. M.J Fisher) [5067]
- Environment Agency (Ms. Claerwyn Hughes) [5082]

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 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 STRATEGY (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 have be 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]
- East Sussex County Council (Mr. Nick Claxton) [5015]
- Rother Homes (Mr. Tony Streeter) [5034]
- The National Trust (Mrs Jane Arnott) [5052]
- Rother Voluntary Action (Mr. M.J Fisher) [5067]
- Southern Water (Ms. Susan Solbra) [5070]
- Ms. Joan Goldsworthy [5080]

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]
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.

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**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]
• Wealden District Council (Mr. Alexei Zammit) [5063]
• Mr. David Vereker [5065]
• Rother Voluntary Action (Mr. M.J. Fisher) [5067]

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’. Craudace 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>Residents Questionnaire</th>
<th>RURAL ROTHER</th>
<th>BATTLE</th>
<th>RYE</th>
<th>BEXHILL</th>
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</thead>
</table>
| **Important qualities in making a good place to live** | Facilities which >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%) | Facilities which >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%) | Facilities which >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%) | Facilities which >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%) |
| **Facilities which >10% respondents identified as ‘unimportant’** | Facilities which >10% respondents identified as ‘unimportant’  
- chemist (10%)  
- jobs/business site locally (17%)  
- safe/convenient cycle access to services (18%)  
- sports/leisure facilities (21%) | Facilities which >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%) | Facilities which >10% respondents identified as ‘unimportant’  
- safe/convenient cycle access to services (11%)  
- sports/leisure facilities (11%) | Facilities which >10% respondents identified as ‘unimportant’  
- village hall/community hall (16%)  
- cash point close by |
### Qualities in the place you live

#### Facilities where >70% respondents considered access to be ‘good’ or ‘very good’
- Village/community hall (79%)
- PO (78%)
- Access to the countryside (77%)

#### Facilities where >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%)

#### Facilities where >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%)

#### Facilities where >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%)

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<tr>
<th>RURAL ROTHER</th>
<th>BATTLE</th>
<th>RYE</th>
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<td>• cash point (29%)</td>
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<td>• Cash point (82%)</td>
<td>• safe/convenient cycle access to services (10%)</td>
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<td>• PO (90%)</td>
<td>• Easy access to a railway station (79%)</td>
<td>• mix of house types etc. (10%)</td>
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<td>• Doctors surgery (17%)</td>
<td>• Safe/convenient cycle access to services (14%)</td>
<td>• Safe/convenient pedestrian access to services (11%)</td>
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<td>• Shops for day to day purchases (20%)</td>
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<td>• convenient parking at facilities</td>
<td>• Village/community hall (14%)</td>
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<td>• convenient parking at facilities (21%)</td>
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<td>(31%)</td>
<td>Mix of house types/sizes/prices (64%)</td>
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<td>Access to sport and leisure (16%)</td>
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<td>Safe/convenient cycle access to services (31%)</td>
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<td>easy access to a railway station (34%)</td>
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<td>Safe/convenient pedestrian access to services (17%)</td>
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<td>Chemist (39%)</td>
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<td>Cash point (39%)</td>
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<td>Jobs/business sites locally (53%)</td>
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No. respondents/age breakdown:

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<tr>
<th>Rural Rother</th>
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<th>Rye</th>
<th>Bexhill</th>
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<tbody>
<tr>
<td>No. respondents: 242 (57% male; 42% female)</td>
<td>No. respondents: 36 (57% male; 42% female)</td>
<td>No. respondents: 28 (54% male; 46% female)</td>
<td>No. respondents: 137 (51% male; 49% female)</td>
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<td>u25 – 1%, 25 to 40 – 12%, 41 to 64 – 48%, 65+ - 39%</td>
<td>u25 – 3%, 25 to 40 – 28%, 41 to 64 – 33%, 65+ - 36%</td>
<td>u25 – 0%, 25 to 40 – 0%, 41 to 64 – 43%, 65+ - 57%</td>
<td>u25 – 4%, 25 to 40 – 13%, 41 to 64 – 42%, 65+ - 41%</td>
</tr>
</tbody>
</table>

Themes:

More than 10% of the rural respondents judged access to For Battle, car parking at facilities was the issue identified by the highest Generally there was good parity in Rye between the issues considered What is interesting about the results for

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%
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 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.

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.

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.

<table>
<thead>
<tr>
<th>RURAL ROTHER</th>
<th>BATTLE</th>
<th>RYE</th>
<th>BEXHILL</th>
</tr>
</thead>
<tbody>
<tr>
<td>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.</td>
<td>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 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).</td>
<td>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 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...</td>
<td></td>
</tr>
</tbody>
</table>
### Summary Responses

**RURAL ROTHER**

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.

**BATTLE**

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.

**RYE**

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.

**BEXHILL**

The strategy has a focus on improving economic opportunities, including new land releases. Increasing the range of housing for families and smaller households is also integral to the strategy, and is being carried forward through proposals for major development at North East Bexhill. Bus access is a priority for movement between Bexhill and Hastings, as is the creation of a cycle network. Additional town centre parking is proposed, while support for the district centres at Sidley and Little.
<table>
<thead>
<tr>
<th>RURAL ROTHER</th>
<th>BATTLE</th>
<th>RYE</th>
<th>BEXHILL</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td><strong>Common promotes local access to shops and services.</strong></td>
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</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

1) 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;
2) Cabinet be authorised to approve the full Core Strategy Preferred Options consultation document; and
3) 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

1. 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.
2. 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.

3. 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 a independent Inspector. This is the stage we are at now.

4. 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.

5. 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

6. 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.

7. 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

8. 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.

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

10. 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.

11. 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.)

12. 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.

13. 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.

14. 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.

15. 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.

16. 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.

17. 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.
18. In terms of the cross-cutting themes, perhaps the main areas of debate relate to:
   - Affordable housing
   - Sustainable energy management
   - Gypsy and traveller provision

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

20. 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**

21. 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><strong>Marsham</strong></td>
</tr>
<tr>
<td>Carroll, James Joseph</td>
<td><strong>Bexhill Sidley</strong></td>
</tr>
<tr>
<td>Carroll, Richard Charles</td>
<td>Bexhill Sackville</td>
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<td>Clark, Charles Albert</td>
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<td>Davies, Miss Angharad Elizabeth</td>
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<td>Dixon, Kevin Paul</td>
<td>Battle</td>
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<td>Douart, Patrick Rene</td>
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<td>Elliston, Robert Victor</td>
<td>Ticehurst &amp; Etchingham</td>
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<td>Ensor, Michael David</td>
<td>Bexhill Central</td>
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<td>Field, Kathryn Margaret</td>
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<td>Forster, Martyn Sheridan</td>
<td>Bexhill St Michaels</td>
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<td>Gadd, Mrs Joanne Patricia</td>
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<tr>
<td>Ganly, Anthony Edward</td>
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<td>Holmes, Mrs Sonia Irene</td>
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<td>Hughes, Mrs Joyce Muriel</td>
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<td>Jenkins, Ian George Francis</td>
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<td>Johnson, Jonathan Miller</td>
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<td>Kentfield, Brian</td>
<td>Bexhill Kewhurst</td>
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<td>Kenward, Martin John</td>
<td>Bexhill Kewhurst</td>
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<td>Lendon, Paul Graham</td>
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<td>Maynard, Carl Raymond</td>
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<td>Miers, Mrs Wendy Mary</td>
<td>Darwell</td>
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<td>Osborne, Paul Norman</td>
<td>Eastern Rother</td>
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<td>Patten, Robin Hugh</td>
<td>Marsham</td>
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<td>Prochak, Mrs Susan Myfanwy</td>
<td>Salehurst</td>
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<td>Name</td>
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<td>Ramus, Charles Nicholas</td>
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<td>Vereker, David William Leslie Medlicott</td>
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<td>Wheeler, Ms Gillian Patricia</td>
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<td>Williams, Mrs Deirdre Celia</td>
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</tr>
<tr>
<td>Winterborn, Mrs Frances McLaren</td>
<td>Bexhill Old Town</td>
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<td>Wood, James Stuart</td>
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</tr>
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## 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 Liason 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>
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<tr>
<td>Network Rail</td>
<td>Town Planner, Mr C. Price</td>
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<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>
<tr>
<td>Town &amp; Parish Councils</td>
<td>Contact name (Clerk)</td>
</tr>
<tr>
<td>-----------------------</td>
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</tr>
<tr>
<td>ASHBURNHAM AND PENHURST</td>
<td>Mr A Wooding Jones</td>
</tr>
<tr>
<td>BATTLE Including Parish Wards of Battle, Netherfield &amp; Telham</td>
<td>Mr P Mills</td>
</tr>
<tr>
<td>BECKLEY</td>
<td>Mrs H Lambert</td>
</tr>
<tr>
<td>BODIAM</td>
<td>Mrs H Lewis</td>
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<td>BREDE Including Broad Oak</td>
<td>Mrs L Bannister</td>
</tr>
<tr>
<td>BRIGHTLING</td>
<td>Mr D G Phillips</td>
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<tr>
<td>BURWASH Including Burwash Weald</td>
<td>Mrs M Hayes</td>
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<tr>
<td>CAMBER</td>
<td>Mrs P A Thresher (Acting)</td>
</tr>
<tr>
<td>CATSFIELD</td>
<td>Mrs C Hodgson</td>
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<tr>
<td>CROWHURST</td>
<td>Mrs P Buckle</td>
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<td>DALLINGTON</td>
<td>Mrs J A Hyner</td>
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<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 Including Three Oaks</td>
<td>Councillor P Brown (Acting)</td>
</tr>
<tr>
<td>HURST GREEN</td>
<td>Miss J Ellis</td>
</tr>
<tr>
<td>ICKLESHAM Including Parish Wards of Icklesham, Winchelsea, Winchelsea Beach &amp; Rye Harbour.</td>
<td>Mr D Rosewell</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>Location</td>
<td>Name</td>
</tr>
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<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>
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<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</td>
<td>Mrs V Bennett</td>
</tr>
<tr>
<td>EAST GULDEFORD (Parish Meeting)</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>
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<tbody>
<tr>
<td><strong>Rother Councillors</strong></td>
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</table>
| Councillor Miss A.E. Davies | • 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 “charcterful” 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 | 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 |
<p>| Councillor Kevin Dixon    | • 5 spatial development options don’t take account of land available and whether infrastructure and services can cope.                                                                                           | Options are intentionally ‘broad-brush’. Caveats are included that all options are pending further detailed investigation.                                                                                                                                                                                                                       |</p>
<table>
<thead>
<tr>
<th><strong>Councillor Mrs Field</strong></th>
<th><strong>Agree with aims to reduce journeys and preserve employment opportunities.</strong></th>
</tr>
</thead>
</table>

| **• Battle & Rye have severe infrastructure issues and no land. Battle cannot cope with 550 dwellings. Primary education a particular problem.**
| **• 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.** |

*See main report re. scale of development 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.
| Cllr Tony Ganley | • Minor amendments regarding Sedlescombe and Ewhurst | Noted |
| 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 | 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. |
<table>
<thead>
<tr>
<th>affordable dwellings</th>
<th>Other points are noted.</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Be realistic about car use and bus financing</td>
<td></td>
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<tr>
<td>- Consider a new or amalgamated village</td>
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<tr>
<td>- Employment needs more research</td>
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</tbody>
</table>

**Delivery Bodies and Agencies**

**GOSE**

- Be concise; use background papers as much as possible
- Add context section with portrait/links to other strategies
- Make vision locally distinctive
- Make indicators and targets locally distinctive
- Add distribution of employment and retail development
- Existing allocations should be tested against options
- Be clear on strategic sites allocated through Core Strategy
- Be clear on any phasing of delivery (i.e. when?)
- Need more detail of level of retail development
- Consider infrastructure within place-making sections
- Will need to demonstrate commitment to provide infrastructure as Strategy develops
- Word policies in a clear way
- Be clear on approach if Bexhill & Hastings Link Road not built/delayed – have contingency

- Noted
- This is proposed.

Amend Vision to incorporate places
Amend where appropriate
Agree – to be drawn from recently completed evidence studies
This will be part of the Sustainability Appraisal
Apart from North East Bexhill, only broad locations are identified
A Phasing ‘profile’ will be added as part of the Implementation section
This can be added, now Study complete
To be highlighted where appropriate

There will be ongoing involvement of delivery agencies
Noted
To be clarified, although this shows limitations in re-allocating elsewhere – see
<table>
<thead>
<tr>
<th>East Sussex County Council (County Archaeologist)</th>
<th>Development Control policies may be in a separate chapter, but still keep the Core Strategy as a strategic document. Common development (control) policies are regarded as best placed in the most relevant section. To be amended.</th>
<th>main report</th>
</tr>
</thead>
<tbody>
<tr>
<td>East Sussex County Council (Children’s Services)</td>
<td>Need a more comprehensive evidence base for historic environment so issue can underpin all LDF strands, including social and economic.</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</td>
<td>More detail on infrastructure to be added.</td>
</tr>
</tbody>
</table>
| East Sussex County Council Strategy and Commissioning Unit | 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). | To be addressed |
| Hastings Borough Council (Borough Planning Officer) | • 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 more information on scale, timing, delivery | 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. |
|---|---|---|
| LSC South East Region (Mr. P. Stoggles) | • Support Shared Vision; strategy for Bexhill; Economic strategy; tourism strategy  
• Add support to maximising benefit of University Centre Hastings | Noted |
| Seaspac - Paul Adams | • 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 & 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 | Noted  
Role of Bexhill town centre to be elaborated, using findings of retail study. |
**Utilities and Agencies**

<table>
<thead>
<tr>
<th>Environment Agency (Lawrence Hamer, Groundwater &amp; Contaminated Land)</th>
<th>• Reference to land contamination?</th>
<th>To be addressed as a development criterion</th>
</tr>
</thead>
</table>
| Environment Agency (Kate Entwistle, Planning Liaison Team Leader) | • Endorse approach to undertaking early informal consultation.  
• Encouraged that vision recognises need for careful management of resources and that aims identify need to maintain and improve natural environment.  
• Supportive of;  
  • Need to consider flood risk  
  • Need to consider infrastructure requirements  
  • Potential for resource efficiency for developments  
  • Issues identified under environment theme  
  • Policy direction to identify opportunities for green networks  
  • Option 2 in policy options for sustainable resource management  
• Ensure Strategic Flood Risk Assessment (SFRA) is in accordance with environment Agency (EA) strategies, and is locally distinctive.  
• Do current policies on flooding add anything to PPS25. | Policies will be informed by the Local Strategic Flood Risk Assessment (SFRA)  
Other points are noted. |
| Fire & Rescue Service, Senior Planner | Re. North East Bexhill:  
- In the event that the link road is not built they have serious concerns about their ability to respond to this location.  
- 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.  
- Rural sites: request that ALL new developments in rural locations are required to install domestic sprinkler systems. | Noted. Ongoing communications with RDC Building Control. |
|---|---|---|
| Highways Agency (Peter Minshull) | 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.  
- Refer to accessibility by non-car modes in overall development strategy  
- Should not be ‘over-reliant on delivery of Link Road or Baldslow Improvements  
- Concerns over development to west of Bexhill  
- Establish need for, and role of, Link Road in Hastings Bexhill Local Area Transport Strategy (HBLATS).  
- Concern about impacts of development at Rye and villages on the A21  
- Note impact of development at Battle on Baldslow Improvement and need to manage travel demand down  
- Limited capacity for development on Marley Lane  
- Should emphasise need to manage car travel | Noted. See main report re: contingencies.  
Had further discussions, including on scale of development close to trunk roads. |
<table>
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<tr>
<th><strong>Network Rail, Town Planning</strong></th>
<th><strong>Registered Social Landlord Development Forum</strong></th>
<th><strong>Southern Water</strong></th>
<th><strong>Stage Coach Bus (Jeremy Cooper)</strong></th>
</tr>
</thead>
</table>
| • 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. | • 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. | • Policy Direction for Sustainable Resource Management supported.  
  • Policy Direction for Flood Risk supported. Support SUDS provided there are arrangements for long term maintenance.  
  • Omission of Policy – Bewl Reservoir.  
  • Omission of Policy – Efficient Use of Infrastructure. | • 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. |
| **Noted.** | **Noted** | Reservoir extensions – see main report (safeguarded pending finalising of the water resources Management Plan)  
Efficient use of infrastructure policy to be included  
Other points are noted. | Locational criteria includes accessibility.  
Transport element to be added to rural policy.  
Rye: reference is to reduce dominance of vehicles, not bus accessibility to the town |
| **HOW TO RESPOND** | **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.**  
Other points are noted. |
| **Sussex Police** | **Support detail on crime**  
**Note need to cover police resources in S106 guidance**  
Noted. |
| **Town & Parish Councils** | **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 heavy vehicles.**  
**Need additional off-street parking**  
**Minor points, amendments and Typos**  
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  
Other points are noted. |
| **Bodiam PC** | **Housing should be of size to facilitate family life.**  
**Top class communications technology should be in plan from outset for business and leisure.**  
Mix of dwelling sizes required in line with government policy.  
Noted |
<table>
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<tr>
<th>Location</th>
<th>Issues</th>
<th>Actions/Notes</th>
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</table>
| Dallington PC     | • Require clarification over scope of Rural Settlement Study and definition of ‘villages’ and ‘settlements’ vis-à-vis ‘parishes’.  
                     • Minor points, amendments and Typos                                   | Detailed reply sent to PC  
                     To be addressed via new sections in RSS and Core Strategy – see main report.  
                     Other points are noted.                                                |
| Iden PC           | • Contingency for Link Road?                                            | See main report  
                     To be addressed                                                         |
| Northiam PC       | • Tight deadline!                                                      | Timescale noted – see main report  
                     • Need to plan sensitively in AONB  
                     • Minor points, amendments and Typos                                   | Additional environmental context sections to be added to rural sections.  
                     Other points are noted.                                                |
| Peasmarsh PC      | • Concern over timescales                                              | Detailed reply sent to PC  
                     • Doubt evidence of housing need for Peasmarsh  
                     • Concern over foul water disposal  
                     • Minor points, amendments and Typos                                   | New section on utilities added to closing section of Rural Settlement Study.  
                     Other points are noted.                                                |
| Rye Foreign PC    | • Why Rye Foreign not included – has a population of over 100? + 2 pubs and doctors surgery  
                     • Leasam Lane included?                                                 | According to our criteria, population is 67.                                  |
| Salehurst & Robertsbridge PC | • Concern over timescales  
                     • 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                      | Detailed reply sent to PC –  
                     Timescale noted – see main report  
                     More context on shops and business to be added to rural sections  
                     Policy to retain commercial premises proposed.                           |
<table>
<thead>
<tr>
<th></th>
<th>Concern over R'bridge conclusions re: open space needs</th>
<th>Other points are noted.</th>
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<td>Confusion over Parish/Village/settlement focus</td>
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<tr>
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<td>Minor points, amendments and Typos</td>
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| Sedlescombe PC | Parish/Settlement/Village issue – confusing, why not use Parish populations? Why does history section stretch into surrounding area – inconsistent. Economic stats come from super output level – again not related to parish. | Clarification of approach, especially to smaller settlements to be addressed via new sections in Rural Settlement Study and Core Strategy – see main report. |
|               | School is full                                           | Additional liaison with ESCC education regarding school capacity is to be undertaken |
|               | Lack of housing is not mentioned by parish respondents and Sedlescombe doesn’t want more affordable housing | Sedlescombe housing figure to be reviewed. |
|               | Support retention of employment but don’t want more.     | Other points are noted. |
|               | Difficult to see where doctors surgery could go          |                         |
|               | Minor points, amendments and Typos                       |                         |

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