

**Rother Development and Site Allocations Local Plan
Examination**

Matter 2: Compliance with the Core Strategy

Statement by Rother District Council

17 April 2019

Please note all references to documents listed in this statement can be found
in the DaSA Examination Documents List at:
www.rother.gov.uk/dasa/examination

Introduction

1. This statement presents the Council's evidence in relation to the key issue raised by the Inspector concerning compliance with the Core Strategy, namely:

Whether the Plan gives effect to and is consistent with the Core Strategy

2. In responding to this key issue, attention is given to the following specific question raised by the Inspector:

Q: Have the overall strategic aims and objectives of the Core Strategy been complied with?

3. The Vision set out in the Core Strategy presents a description of Rother in 2028, highlighting the changes from the start of the Plan. It sets out the main priority for the future as providing for continual and sustainable improvement in the quality of life of existing and future residents of the District and for local communities as a whole.
4. The Vision is translated into 12 Strategic Objectives which are set out in Table 1 of the Core Strategy (reference SA4)¹. Rather than repeat each objective in full in this Statement, the answer will be structured under the 12 "themes" listed in that Table, with reference made to relevant Core Strategy policies as appropriate.

Overall Spatial Strategy

5. The key Core Strategy policy is OSS1: Overall Spatial Development Strategy, which details the targets for the numbers of additional homes and business floorspace and sets out details of the spatial distribution. This is further broken down in Figure 8² and the relevant settlement chapters, including Figure 12 in respect of villages.
6. Chapter 8 (Overview) of the DaSA explains how the allocations within the DaSA and Neighbourhood Plans will meet the housing and business floorspace requirements, having regard to the number of commitments and completions since the start of the Plan period. Paragraph 8.14 confirms that for all settlements, the allocations are regarded as in line with the overall settlement strategy. Paragraphs 8.19-8.22 address business land needs.

¹ Page 25

² Of the Core Strategy

7. The overall methodology and process for selecting sites is to be discussed under Matter 5. In short, this has been undertaken in accordance with the Site Assessment Methodologies Background Paper³. Paragraph 2.1 of the Background Paper confirms that the Council's approach to assessing the appropriateness, or otherwise, of putting a site forward as a development allocation in the DaSA is to, inter alia, (i) ensure that it accords with the development strategy contained within the adopted Core Strategy; and (ii) is consistent with the 'core', strategic policies of the Core Strategy. Paragraph 2.12⁴ lists the notable site-specific considerations that applied to site selection, thereby ensuring the allocations respond to "the particular local circumstances and environmental resources" as required under the Core Strategy Strategic Objective.

Bexhill

8. Chapter 9 of the DaSA (Bexhill) builds on the Bexhill policies of the Core Strategy (BX1-3).
9. Policy BEX1 of the DaSA essentially meets the residual minimum quantitative requirement for business land while the residential allocations meet the residual Core Strategy requirement⁵ in accordance with Core Strategy Policy BX3.
10. Policy BEX3 (Land at North Bexhill) and the accompanying policies (a, b, c) take forward the "broad location" for future development identified in the Core Strategy and will provide a high quality residential-led urban extension, also in accordance with Core Strategy Policy BX3.
11. Other residential allocations are spread throughout the town and include a mixture of extensions on the edge (e.g. Policies BEX2, BEX3) together with redevelopments within the town (e.g. BEX5, BEX8). DaSA policies that will apply to all relevant developments, including DHG1 (Affordable Housing), DHG3 (Residential Internal Space Standards), DHG4 (Accessible and Adaptable Homes) and DHG7 (External Residential Areas) will, together with Core Strategy policies (e.g. LHN1 – Achieving Mixed and Balanced Communities, OSS4 – General Development Considerations, EN3 – Design Quality), ensure that residential developments are of a high quality, suitable for families, the young and elderly alike, with appropriate affordable provision, in accordance with the Core Strategy objective and Core Strategy Policy BX1 (ix).
12. Mixed use developments at the former High School site and Drill Hall (DaSA Policy BEX4) and land at Northeye (Policy BEX10) make the most of previously developed land and, together with an allocation for playing pitches at Sidley Sport and Social Club (Policy BEX11), will enhance sports and leisure facilities in the town, in accordance with Core Strategy Policy BX1 (ii).

³ Reference SB1

⁴ Of the Background Paper

⁵ Taking into account planning permissions, sites with commitments and completions since the beginning of the Plan period

13. Commercial, retail and tourism development is supported through DaSA Policies including BEX1, BEX4, BEX12 and 13 (Town Centre), BEX14 (Beeching Road), BEX15 (Cultural area) and BEX17 (District Centres). Together with DaSA policy DEC3 (Existing Employment Sites and Premises) and Core Strategy policies, these will “support a more prosperous future for the Bexhill and Hastings area”, in accordance with the Core Strategy Strategic Objective and Core Strategy Policies BX1 (iii, viii) and BX2.
14. Policies also support public realm, traffic and other improvements in the town centre such as BEX12, BEX15 and BEX16, assisting Bexhill “to become one of the most attractive places to live on the south coast”, in accordance with the Core Strategy Strategic Objective and Policy BX2.

Hastings Fringes

15. Chapter 10 of the DaSA (Hastings Fringes) builds on the Hastings Fringes policy of the Core Strategy (HF1).
16. DaSA Policy HAS1 (Combe Valley Countryside Park - CVCP) is in accordance with, and implements, Core Strategy Policy HF1 (i). The CVCP is a long term project which addresses the deficiency in green space for the towns of Hastings and Bexhill and is an important component of the provision of “attractive and accessible fringes of Hastings, consistent with environmental designations”, as required by the Strategic Objective. DaSA Policy HAS4 (Rock Lane Urban Fringe Management Area) implements Core Strategy Policy HF1 (ii). The improvement of this accessible area will also support the achievement of the Strategic Objective.
17. As noted at paragraphs 10.6-10.7 of the DaSA, Policy HAS2 (Land at Michael Tyler Furniture) meets the residual requirement for new dwellings within the Hastings Fringes, in accordance with the Core Strategy target (Policy HF1 (vi)).
18. DaSA Policy HAS3 (Land north of A265, Ivyhouse Lane) supplements the employment floorspace provided for by an outline planning permission at Burgess Road⁶, in accordance with the Core Strategy target for employment floorspace within the Hastings Fringes (Policy HF1 (v)).
19. Lastly, DaSA Policy DEN3 (Strategic Gaps) implements Core Strategy Policy HF1 (iii).

Rye

20. The Core Strategy considers Rye and Rye Harbour together at Chapter 10 and Policy RY1, recognising that while Rye Harbour is a “satellite village” to Rye, it is actually within Icklesham Parish.

⁶ Detailed at paragraph 10.8 of the DaSA

21. The Parish of Rye is not subject to site allocations within the DaSA due to there being a Neighbourhood Plan in preparation⁷, which will (together with the DaSA allocation at Rye Harbour – see below) meet the residual requirements for residential development set out in Policy RY1 (v) of the Core Strategy and Figure 16 of the DaSA⁸. Policy OVE1 of the DaSA provides a framework for determining relevant planning applications in Rye (and other settlements) until such time as a Neighbourhood Plan is in force.
22. The Development Policies of the DaSA, will, however, apply to Rye (along with the whole of the District) and will assist in meeting various aspects of the strategic objective and Core Strategy Policy RY1. For example, the Resource Management Policies (DRM1-DRM3) will support economic and social well-being, and more broadly, the mitigation of climate change. Policies DCO1 (Retention of Sites of Social and Economic Value), DEC2 (Holiday Sites) and DEC3 (Existing Employment Sites and Premises) will support economic and social well-being, including tourism, while the Housing and Environment Policies will support high quality residential developments with appropriate affordable provision, and the preservation of the character of Rye, its ecological importance and protection against flood risk.
23. More specifically, DaSA Policy DEN3 (Strategic Gaps) maintains the strategic gap between Rock Channel and the Harbour Road Employment Area, in accordance with Core Strategy Policy RY1 (xii).
24. It should be noted, however, that the Neighbourhood Plan, once adopted, will also include development policies. Where there is any conflict with DaSA policies, the most recent Plan will take precedence.
25. Rye Harbour is subject to site specific policies in the DaSA. Policy RHA1 (together with the Neighbourhood Plan), will meet the Core Strategy residential target for Rye and Rye Harbour. Policy RHA2 supports business development within the Harbour Road Employment Area (and involves an extension to that area compared to the Rother Local Plan 2006⁹), while protecting the adjoining, internationally designated wildlife sites, in accordance with Core Strategy Policy RY1 (v).

⁷ As at April 2019 the Neighbourhood Plan is at examination stage

⁸ Page 107 of the Submission DaSA

⁹ Local Plan 2006 Document reference SA1. Extension detailed in the DaSA Local Plan Options and Preferred Options (Reference SA5), pages 297-298.

Battle

26. Like Rye, Battle Parish is not subject to site allocations within the DaSA due to there being a Neighbourhood Plan (NP) in preparation¹⁰, which will meet the residual requirements for residential and other development set out in Policy BAT1 of the Core Strategy. However, until the NP is adopted, Policies BT2 and BT3 of the Local Plan (2006)¹¹ will remain in force¹². Policy BT2 in particular (Land at Blackfriars) forms an important element of meeting the Core Strategy's housing target for the town, and the site is subject to a current planning application¹³.
27. DaSA Policy MAR1¹⁴ (Land at Felon's Field, Marley Lane) provides for some 3,000sqm of floorspace for industrial/storage purposes, contributing to the Core Strategy target for employment floorspace for Battle, detailed in Policy BA1 (iv).
28. Policy OVE1 of the DaSA provides a framework for determining relevant planning applications in Battle (and other settlements) until such time as a Neighbourhood Plan is in force.
29. Like Rye, the Development Policies of the DaSA will apply to Battle. DaSA Policies DCO1 (Retention of Sites of Social or Economic Value), DEC2 (Holiday Sites) and DEC3 (Existing Employment Sites and Premises) will support the town's economy and tourism function. Policies DEC1 (Shopfronts etc), DHG9 (Extensions, etc), DHG11 (Boundary Treatments), DEN1-2 (Landscape Character/ AONB) and DEN3 (Strategic Gaps) will assist in protecting its character and that of its setting. Policy DEN4 will support biodiversity improvements in accordance with Core Strategy Policy BAT1 (ix), and the DaSA housing policies (DHG1-12) will support high quality residential developments with appropriate affordable provision.
30. It should be noted, however, that the Neighbourhood Plan, once adopted, may also include development policies. Where there is any conflict with DaSA policies, the most recent Plan will take precedence.

¹⁰ Expected date of submission: July 2019

¹¹ Document reference SA1

¹² Appendix 2 of the DaSA incorrectly lists these 2 policies as superseded but this typographical error is corrected in the Council's Schedule of Proposed Modifications (Reference RDC-DaSA-005)

¹³ Reference RR/2019/604/P – currently undetermined.

¹⁴ This was included the employment floorspace target which is apportioned to Battle Parish, although the site is actually located within Sedlescombe Parish (and was scoped out of the Sedlescombe Neighbourhood Plan).

Rural Areas

31. The DaSA residential allocations largely meet the residual Core Strategy housing targets for those villages not subject to Neighbourhood Plans¹⁵, and the Neighbourhood Plans are expected to meet the remaining residual targets, in accordance with Core Strategy Policy RA1 (vi). The individual site allocations have been the result of detailed site assessments¹⁶, and the policies include criteria to ensure the sites' development protects the locally distinctive character of villages and their settings, in accordance with Core Strategy Policy RA1 (i).
32. DaSA Policy DIM2 (Development Boundaries) gives effect to Core Strategy Policy OSS2, focusing development within defined settlement boundaries and limiting development in the countryside to that which accords with specific policies or for which a countryside location is necessary, thereby protecting the character and functions of the countryside in accordance with Core Strategy Policy RA2.
33. DaSA Policies DCO1 (Retention of Sites of Social or Economic Value), DCO2 (Equestrian Developments), DEC2 (Holiday Sites) and DEC3 (Existing Employment Sites and Premises) support rural communities and the rural economy within villages and the countryside. DaSA Policies DEN1-2 (Landscape Character/ AONB), DEN3 (Strategic Gaps) and DEN4 (Biodiversity and Green Space) will assist in protecting the character of villages and the landscape, and the ecological and intrinsic value of the countryside in accordance with the Strategic Objective.
34. DaSA Policy DHG1 (Affordable Housing) will ensure on-site provision of affordable housing on relevant schemes in the Rural Areas, and Policy DHG2 (Exception Sites) provides for affordable housing outside development boundaries where this is justified, thereby supporting meeting local needs and the retention of viable, mixed rural communities in accordance with the Strategic Objective. Both of these policies have been updated from the Core Strategy to ensure consistency with national policy.

Sustainable Resource Management

35. As noted above, the DaSA allocates land for development in line with the overall settlement strategy of the Core Strategy. This approach, to locate development close to services and public transport links, reduces the need to travel, thereby supporting a reduction in emissions and climate change.
36. Policy DRM1 of the DaSA (Water Efficiency) implements Policy SRM2 (v) of the Core Strategy and addresses the need for continued water efficiency savings in this area of "Serious Water Stress"¹⁷.

¹⁵ DaSA Figures 17 and 18 (pages 108-9) and paragraph 8.14

¹⁶ Discussed further in the Council's Statement for Matter 5.

¹⁷ As defined by the Environment Agency

37. Policy DRM2 of the DaSA (Renewable Energy Developments) supports appropriate low carbon and renewable energy schemes in accordance with Core Strategy Policy SRM1 (iii), while DaSA Policy DRM3 (Energy Requirements) accords with Core Strategy Policy SRM1 (ii) and updates the thresholds in SRM1 (i).
38. DaSA Policy DEN4 supports the conservation of biodiversity and green-space, including designated sites and ecological networks, recognising the multiple benefits that can be achieved, including flood protection¹⁸, in accordance with Core Strategy Policy SRM1 (vi). DaSA Policy DEN5 seeks to prevent flooding and drainage problems throughout the District, as well as pollution in the Pevensey Levels, in accordance with Core Strategy Policy SRM2 (iii).
39. DaSA Policy DHG7 (External Residential Areas) requires suitable waste and recycling facilities in residential development in accordance with Core Strategy Policy SRM1 (viii) while DaSA Policy DIM1 (Comprehensive Development) requires integrated schemes for the development of sites to ensure efficient use of land and resources.

Communities

40. DaSA Policy DCO1 (Retention of Sites of Social or Economic Value) gives further weight and explanation to Core Strategy Policy CO1, providing a strong policy position for retaining such sites and not allowing their diminution.
41. The DaSA includes specific site allocations that will support other Core Strategy Communities Policies. A new doctor's surgery is proposed through DaSA Policy FAC2 in accordance with Core Strategy Policy CO2. A number of allocations include open space provision in accordance with Policy CO3 (e.g. BEX2, BEX3, BRO1) and more specifically, sports facilities (e.g. BEX4, BEX10, BEX11, WES1) and play areas (e.g. PEA1) in accordance with Core Strategy Policy CO4. A number of allocations also support improvements in public transport or walking/ cycling links (e.g. BEX3, BEX4, CAT1, WES1) in accordance with Core Strategy Policy CO4.
42. Core Strategy Policy CO5 is given effect by DaSA Policies DHG4 (Accessible and Adaptable Homes) and DHG5 (Specialist Housing for Older People) as well as site allocations which include older people's housing (e.g. FAC2, NOR2 and WES2).
43. More broadly, the general approach taken through the Core Strategy and DaSA of focusing development in more accessible locations with a greater range of services, ensuring appropriate provision of affordable housing (DaSA Policy DHG1) and seeking to retain existing employment sites (Policy DEC3) all support vibrant, balanced and inclusive communities, in line with the strategic objective.

¹⁸ DaSA paragraph 6.41

Local Housing Needs

44. The Housing Policies of the DaSA give further weight and detail to those of the Core Strategy. As noted above, DaSA Policies DHG1 and 2 (Affordable Housing, Rural Exception Sites) update Core Strategy policies LHN2 and 3 to ensure consistency with national policy. DaSA Policy DIM1 (Comprehensive Development) is important in ensuring that new developments include all necessary and appropriate elements including affordable housing, open space and other infrastructure, even when sites are developed in stages or by different developers.
45. DaSA Policies DHG3 (Residential Internal Space Standards), DHG4 (Accessible and Adaptable Homes) and DHG7 (External Residential Areas), together with DRM1 (Water Efficiency) will assist in improving the quality of all residential developments and widening the range of people developments are suitable for, thereby providing choice, in accordance with the Strategic Objective. Policy DHG6 (Self-build and Custom Housebuilding) provides for that proportion of residents looking to construct their own home, also providing choice and supporting mixed and balanced communities in accordance with Core Strategy Policy LHN1. DaSA Policy DHG5 (Specialist Housing for Older People) will assist in providing housing for this section of the community.
46. All of the DaSA site allocations make provision for affordable housing where relevant, in accordance with Policy DHG1, and include requirements for complementary development including open space, sustainable transport links and other land uses where appropriate to ensure housing is provided in a way that supports local priorities and develops balanced communities in accordance with the Strategic Objectives.
47. DaSA Policies BEX3 and GYP1 provide for the residential needs of Gypsies and Travellers, in accordance with Core Strategy Policies LHN5 and LHN6.

Economy

48. Policy DEC3 of the DaSA (Existing Employment Sites and Premises) updates and supersedes Core Strategy Policy EC3 in light of the findings of the Employment Sites Review (Reference SF1)¹⁹. Additionally, DaSA Policy DEC2 (Holiday Sites) supports proposals for suitable tourist accommodation on holiday sites, while ensuring the protection of the environment, in accordance with Core Strategy Policy EC6.

¹⁹ Paragraphs 5.29-5.42 of the DaSA provide further detail on the Employment Sites Review.

49. The DaSA includes a number of allocations for business use to meet the Core Strategy targets identified in Core Strategy Policy EC2 and Figure 8. Policy BEX1 of the DaSA essentially meets the residual quantitative requirement for business land in Bexhill; Policy HAS3 provides for business floorspace in the Hastings Fringes and Policy MAR1 allocates land in a rural area with good access to the Strategic Road Network. Policy RHA2 (Harbour Road Employment Area) supports the continued business use and improvement of the largest concentration of industrial uses in the District.
50. Policy BEX14 allocates land in Bexhill for retail and commercial use and Policies BEX13 and BEX17 seek to focus retail and other town centre uses within these areas for the benefit of the local economies and to support local communities.
51. In combination these DaSA policies will support sustainable economic growth in accordance with the Strategic Objective.

Environment

52. A key factor in determining the overall spatial strategy of the Core Strategy, with which the DaSA aligns, has been the need to maintain the high quality natural and built environment. This is assisted by individual requirements within site policies, for example, landscaping or open space requirements or the retention of particular natural or built environment features. The DaSA also includes a number of development policies that give further effect to the Environment policies of the Core Strategy.
53. DaSA Policies DEN1 (Maintaining Landscape Character), DEN2 (High Weald AONB) and DEN3 (Strategic Gaps) accord with and expand upon the provisions of Core Strategy Policy EN1. DaSA Policy DEN4 (Biodiversity and Green Space) supplements Core Strategy Policies EN5 and EN1 (vi), detailing the expectations of the Council in relation to conserving biodiversity through development. DaSA Policy DEN5 (Sustainable Drainage) accords with Core Strategy Policy EN6 and gives further detail on how to implement Policy EN7 (iii). DaSA Policy DEN6 (Land Stability) supports the long-term stewardship of the natural and built environment through avoiding development on unstable land and Policy DEN7 provides a framework for preventing environmental pollution, thereby maintaining the high quality environment and having regard to the potential effects on climate change, all in accordance with the Strategic Objective.
54. The quality of the built environment is supported through the DaSA by policies including DHG9 (Extensions, etc), DHG11 (Boundary Treatments), DHG12 (Accesses and Drives) and DEC1 (Shopfronts etc), which support Core Strategy Policies EN2 and EN3.

Transport and Accessibility

55. There are no DaSA policies specific to transport but, as noted above, the general approach to site allocations has been to follow the Core Strategy's overall spatial strategy, which focuses development on those areas with better access to services and jobs, in accordance with the Transport and Accessibility Strategic Objective.
56. In addition, individual site allocations incorporate measures to improve local connectivity (particularly for sustainable transport) where relevant and necessary, such as Policies BEX1, BEX2, BEX3 and CAT1. Furthermore, the provision of a safe access has been a key requirement of site allocations, and policies include necessary pedestrian infrastructure where appropriate. DaSA sites policies also require traffic management measures where necessary, in accordance with Core Strategy policies TR3 and TR4, such as Policies BEX4 and CAM2 .

Conclusion

57. This statement has demonstrated, with specific reference to DaSA policies, how the DaSA gives effect to and is consistent with the Core Strategy, and the overall strategic aims and objectives of the Core Strategy been complied with.