

Consultation on Rother Draft Local Plan:

Salehurst & Robertsbridge Parish Council Response July 2024

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Policy, Paragraph Section or Question	Comment or Question
Comment 1	The plan is lengthy and complex, and this will likely mean that many residents will not take the opportunity to comment. For example, there are 5 affordable housing policies with some repetition between the policies. Specifically, Policy HOU11 needs more detail, Policy ECO6 needs a definition of 'modest scale' since everybody has a different idea of what would constitute 'modest', and the same comment applies to Policy ECO7 which requires a definition of 'an isolated site'.

Comment 2	We strongly support the ambition for the plan to be ‘green to the core’ but is it too aspirational to be effectively implemented in the context of current budget / resource constraints? We are deeply concerned that the ongoing lack of resources for effective enforcement will result in green and other planning policies not being complied with by unscrupulous developers. For example, Policy GT3 construction materials and waste, Policy HOU18 boundaries, Policy HOU19 access, and Policy ECO10 equestrian developments are all issues where we encounter developers who attempt to bend / break the existing rules and escape the consequences. It will be important to ensure that green issues do not automatically override other critically important issues; for example, Policy GTC1 building standards could greatly affect the prospects for some vital developments to move forward and it will sometimes be appropriate to reach a compromise. It is vitally important to preserve dark skies (Policy LAN3) in rural areas, for example through appropriate requirements re streetlighting on new developments.
Comment 3	The plan appears to be more focused on urban areas with less thought on how it will impact rural communities which we assume reflects the reality which is that there will be significantly more development in urban areas. We are pleased to note the vision for the Northern sub-area is for ‘small scale sensitive residential development and growth in villages’. There are more practical difficulties to achieve ‘live well locally’ in rural communities where infrastructure and facilities are not as developed as in urban areas. Policy LW2 facilities requires more detail regarding implementation. Robertsbridge is already designated as a Local Hub but we have not to date seen any additional resources allocated to reflect this designation, so more detail must be provided regarding Local Hub funding. Live Well Locally (LWL) facilities and services requires more detail regarding implementation; for example, the within 800 metres concept does not take account of the fact that for some residents even 80 metres distance to the nearest shop is a challenge. Also, the role of community spaces such as village halls needs to take account of the fact that village halls vary significantly in terms of facilities and ownership / usage

	policies. Regarding Policy IN1 infrastructure, the distribution of strategic CIL money has always been skewed towards the large urban areas such as Bexhill and certainly Robertsbridge has not received any such monies to date. This was a significant factor in our decision to create a Neighbourhood Plan.
Comment 4	Why is the HELAA being consulted on at the same time as the local plan? We would like explanations as to how the HELAA sites have been identified and the implications for our own Local Neighbourhood Development Plan (Salehurst & Robertsbridge Neighbourhood Development Plan, in force from July 2018). Please note comments submitted separately by Stephen Hardy who led our Neighbourhood Plan Group. Most importantly, could additional sites not in our neighbourhood plan be added to the Local Plan when we have been advised by Rother Planning Department not to review our neighbourhood plan until the local plan is agreed? For example, in our Parish Site SAL0012 (land off Bishops Lane) is identified as a potential site even though it was rejected by our community as part of the local neighbourhood plan process and this exclusion was accepted by the Government Inspector who reviewed our proposed Neighbourhood Plan. The Parish Council and residents feel very strongly that it is crucial that our Neighbourhood Plan, overwhelmingly supported by residents in our referendum, should be respected by Rother as an important output of the democratic process. We also question why Site SAL005 (land off Station Road) is not included as an identified site as it has an approved planning application for a new Health Centre and housing (in the draft plan it is labelled a potential site). Where is the total number of proposed new dwellings in each Parish, previously listed in the Core Strategy) going to be published? We agree with your assessment that Redlands Lane Traveller site in our Parish should not be expanded. However, could Policy HOU11 mean that this site could grow in the future regardless of the fact it is not identified in the Plan, if there is space for it to expand? We would not welcome this development as it is a very settled site, with families living there for a long time.
Comment 5	We are very concerned about the proposal regarding 100% affordable housing sites (Policy HOU1 does not specify 40% affordability). While we want to see more affordable housing, we strongly believe that

	such housing should be intermingled with the private dwellings to avoid the affordable housing being set apart and ensure that the various residents on a site co-exist as a whole and not as different groups. Policies HOU3 and HOU4 will impact on communities including the availability of CIL money (one of the key incentives for our parish to devote significant resources towards creating a Neighbourhood Plan was to be able to use the enhanced CIL to finance improvements to public facilities within our Parish). Our largest identified site by far is Site SAL0003 Hodson's Mill which has recently been acquired by Homes England which has an objective to provide affordable homes. If Homes England decide to build a sizeable proportion or possibly 100% affordable homes this will significantly impact the CIL money our Parish receives (the Government Inspector determined that there should be no requirement for affordable homes on the site due to the likely high development costs) to develop the local provided infrastructure such as playground facilities, to support this large development. We would appreciate an explanation for the proposed density of eco homes. In addition Policy HOU10 suggests there is not growing demand for care homes for older residents which does not reflect our experience of need for greater provision in rural areas.
Comment 6	We are very concerned about the proposal to weaken the importance of development boundaries (Policy DEV3) as Policy HOU4 allows new developments outside development boundaries. Surely, the whole point of development boundaries is to prevent such overspill! There is no additional protection for the High Weald National Landscape which itself has a new and less robust plan. Policy GTC9 High Weald National Landscape (AONB) needs to be more robust with clearer definition of minor and major development. Dark skies in rural areas need protection from inappropriate lighting schemes on both commercial and residential developments along with equestrian menages. In Policy HOU1 new dwellings outside development boundary needs clarification. Are farms being consulted effectively on the proposed ECO1 outside development boundary policy?
Comment 7	Why is so much weight to be given to the High Weald AONB (Landscape) Management Plan which will change every 5 years meaning that policies to be implemented over the next 20 years are reliant on a document that changes within that time frame? We feel it would be more appropriate to simply say

	that the Local Plan will have regard to the new High Weald AONB plan and its successors when implementing the provisions of the Local Plan to avoid tying RDC's hands. We also note that the new High Weald AONB Management Plan has been criticised by some local nature groups for being weaker than the former guidance. Future versions could continue to weaken the protection for the High Weald National Landscape.
Comment 8	Policy INF1 strategic infrastructure requirement needs more detail to deliver anything meaningful. In Robertsbridge we are already expected to accommodate many new homes under the old /existing Local Plan but to date we have not seen any evidence that the implications of these homes for critical infrastructure such as schools and doctors' surgeries are being considered and acted upon in a strategic forward-looking manner.
General Comment 9	It is unfortunate that the proposed plan reflects the current status quo where developers can sit on sites with planning permission with only a requirement to submit updated applications every few years. Also, development within our development boundary is severely constrained by the high costs associated with the provision of utilities like electricity, water and sewage / rainwater disposal by the local network operators. The current networks are generally near to or at maximum capacity so reinforcement works for new connections can be the deciding factor as to the viability of developments. In the absence of progress on these two issues by the new government it is, sadly, highly unlikely that the new RDC Local Plan will deliver meaningful change.