



Peasmarsh Neighbourhood Development Plan 2021 to 2039

Consultation Statement

February 2023



Consultation Statement

Table of Contents *[with active links to pages]*

1	Purpose	2
2	Consultation Activity	4
3	Regulation 14 Consultation	8
4	Summary of Regulation 14 Outcomes	10
	Annexe CS1 : Notes of Utilities Meetings	53
	Annexe CS2 : Responses from Stakeholders and Others	61
	Annexe CS3 : Responses from Statutory Consultees	77



Consultation Statement

1 Purpose

This Consultation Statement outlines the overall process of community engagement which has supported the development of the Peasmarsch Neighbourhood Development Plan [PNDP]. The document sets out a chronology which ends with the formal Regulation 14 public consultation and the submission of the Regulation 15 Draft.

The statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012. The legal basis is provided by Section 15(2) of Part 5 of the 2012 Neighbourhood Planning Regulations which requires a consultation statement to :

- i) contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
- ii) explain how they were consulted;
- iii) summarise the issues and concerns raised; and
- iv) describe how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan;

Although the main focus of this document is to describe the feedback from the Regulation 14 consultation process, it also details how consultation has been managed during the development of the Plan.

Stakeholders have been informed and consulted throughout the plan preparation process by a variety of means, both physical and electronic : flyers delivered through the door, workshops in the parish Memorial Hall, a permanent noticeboard in the local supermarket, the monthly 'Peasmarsch Periodical', a PNDP website, a PNDP email account, a PNDP FaceBook page, a PNDP SurveyPlanet account running various surveys plus external resources such as the magazine of the Parish Church and various local publications.

Rother District Council [RDC] and local businesses were also consulted during the period.

The results of the consultations were used to drive the overall direction of the Plan. The process has been community-led and undertaken by community volunteers. Consultants, supplied by the Locality technical support system, were used for specific tasks.

1.1 Peasmarsch

This document supports the Peasmarsch Neighbourhood Development Plan and is submitted by Peasmarsch Parish Council, which is a qualifying body as defined by the Localism Act 2011.

Peasmarsch is the name of both a parish and the only village within the parish. It is within the area of Rother District Council, the relevant local authority. For development planning purposes, the Neighbourhood Area [NA] has been designated as the full extent of the parish. The designation, by RDC, was made on 25th March 2021.

Figure 1 [over] is a map of the parish and hence the Neighbourhood Area.

The parish is entirely within the High Weald Area of Outstanding Natural Beauty [AONB] and exhibits many of the characteristics of the High Weald including ancient woodlands, scattered historic farmsteads and hamlets, a wealth of listed buildings and the main village itself, located on an historic routeway probably first used by the Romans.



Consultation Statement

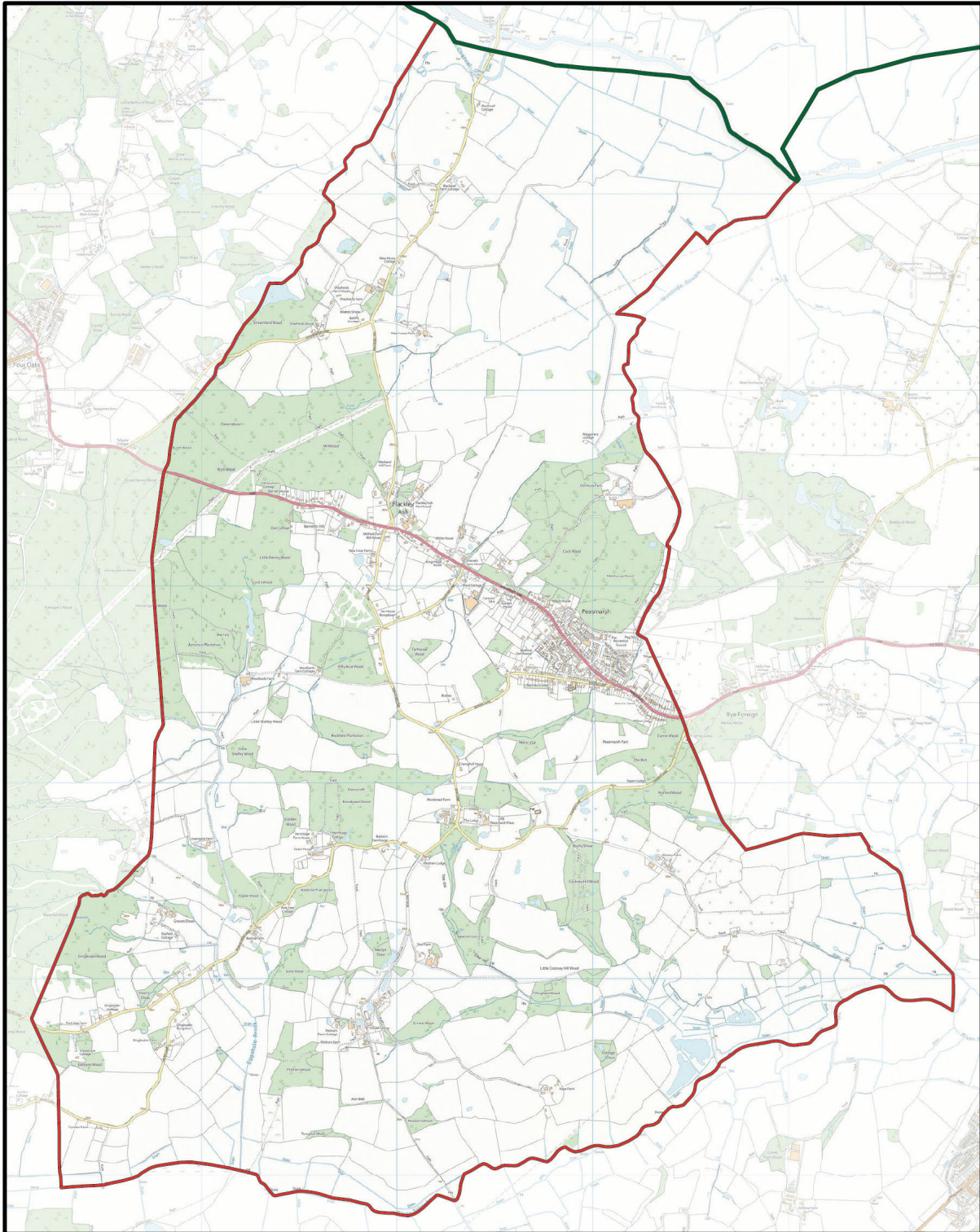


Figure 1 : Peasmarsh Neighbourhood Area



Consultation Statement

2 Consultation Activity

Peasmarsh Parish Council [PPC] started the process of creating a Neighbourhood Development Plan in October 2020, opening discussions with RDC and seeking volunteers from the community to help with the effort. The PPC wanted to establish a separate NDP group to undertake the work but there was no intention of excluding councillors from also being members of the group.

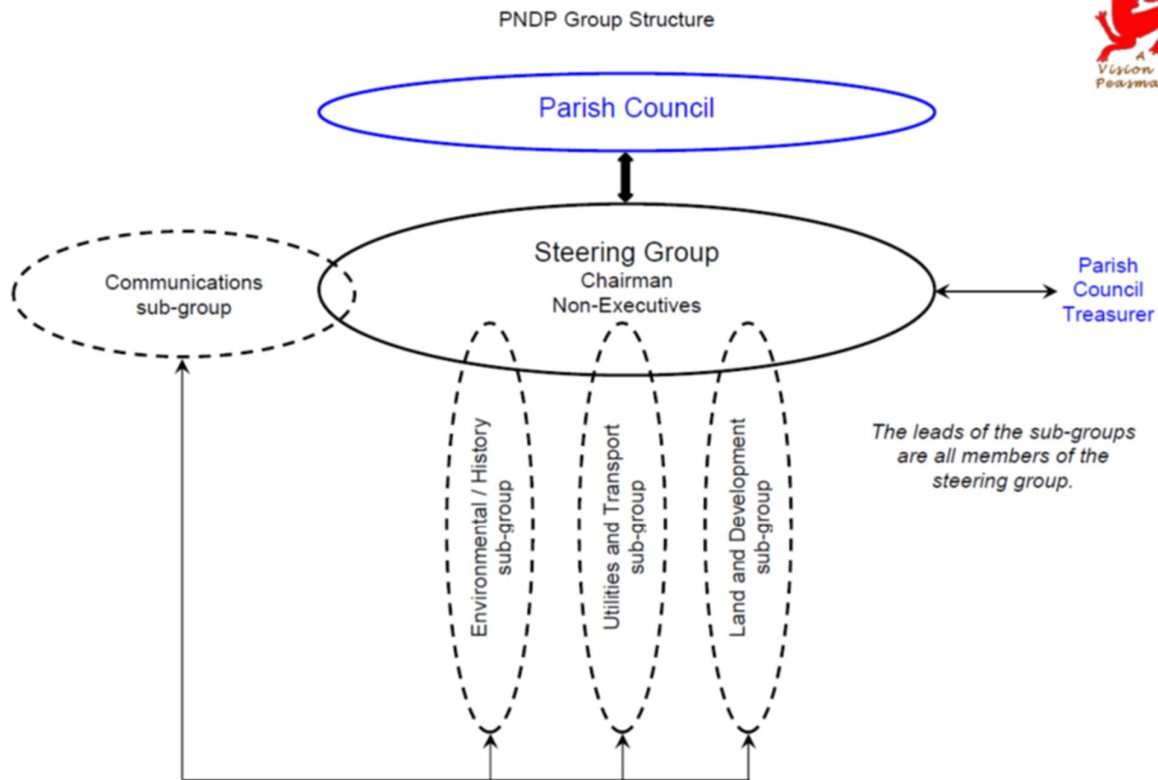
This was a very difficult period as there were severe limitations on activities because of the covid pandemic. The problems persisted through the first half of 2021 and beyond.

The first, informal zoom meeting of councillors, the first volunteers and the parish clerk took place in January 2021 and the first formal liaison meeting between the PPC and the emerging volunteer group was in early February.

PPC formally resolved to begin the application process with RDC at its March 2 2021 meeting. The designation was made by RDC on March 25 2021.

It was agreed that all communications would be in English as English was the main language of 99.4% of households at the time of the 2011 census.

The volunteer group remained a somewhat amorphous group for several months while additional volunteers were recruited. It was only in July 2021 that a structure for the group was agreed and a steering group was established :





Consultation Statement

Terms of reference for the volunteer group were agreed in early April 2021 [subsequently revised in October that year]. In order to produce a Plan which reflected the wishes of the community and promoted the social, economic and environmental well-being of the parish, the following group objectives were identified :

- a) provide opportunities to influence local decision making, including the opportunity to develop local planning policies;
- b) provide opportunities and encourage all residents and businesses within the boundary of Peasmarsh to have their say in producing the plan;
- c) seek to make the area more sustainable and protect the natural environment;
- d) establish openness and transparency between all organisations about the proposals for Peasmarsh;
- e) work in close liaison with Peasmarsh Parish Council'
- f) conform with the relevant provisions of national neighbourhood planning legislation, exercising any powers which attach to the group as a designated forum;
- g) ensure that the Plan :
 - i) is in general conformity with Rother District Council's adopted Local Plan and, in due course, with the emerging Local Plan;
 - ii) has regard to national planning policy and guidance;
 - iii) contributes to the achievement of sustainable development, including but not limited to, renewable and green energy, cycling, walking and public transport;

2.1 Community Engagement Timeline

The key engagement steps with the stakeholders, initially hampered by the limitations of the covid pandemic, were :

Apr 2021	flyer delivered to all houses in the village and distributed via businesses to staff; <i>[explain purpose of PNDP, advance warning of Public Consultation dates, recruitment of volunteers, reach out to businesses]</i>
Jun 2021	flyer and survey form delivered to all houses in the village and distributed via businesses to staff; survey open to the end of July; <i>[confirm dates of public consultation, explain survey and offer draw for shopping voucher for completing survey]</i>
Jun 2021	Business Survey issued online; open for 4 months;
Jul 3 & 4 2021	first Public Consultation / Workshop : drop-in event in the Memorial Hall;
Sep 24 & 25 2021	feedback meetings in the Memorial Hall to present results of first Public Consultation and the July survey;
Oct 12 2021	survey results published□;
Oct 15 2021	open meeting to bring in more volunteers;



Consultation Statement

Oct 2021	flyer hand delivered to all known businesses including self-employed; <i>[remind that business survey to be completed before close]</i>
Nov 29 2021	Vision and Objectives published ^① for comments;
Nov 30 2021	open briefing meeting from the Chairman of Icklesham PC on that parish's experiences with a rural exception site / community land trust;
Dec 8 2021	meeting with Chairman and Planning officers of RDC;
Feb 5 2022	external consultant's Housing Needs Assessment [HNA] and PNDP summary thereof published ^① ;
Feb 21 2022	external consultant's Strategic Environmental Assessment [SEA] Scoping Report sent to statutory consultation bodies; open for 6 weeks;
Mar 13 2022	SEA Scoping Report and PNDP summary thereof published ^① ;
Apr 2022	flyer delivered to all houses in the village and distributed via businesses to staff; <i>[confirm dates of second public consultation]</i>
May 7 & 8 2022	Second Public Consultation / Workshop : drop-in event in the Memorial Hall;
May 18 2022	PNDP presentation made to the Parish Assembly [first assembly after two year pause];
Jul 1 2022	external consultant's Site Options and Assessment [SOA] and PNDP summary thereof published ^① ;
Aug 18 2022	PNDP Site Assessments, building on the consultant's SOA, and a summary thereof published ^① ;
Sep 2022	flyer delivered to all houses in the village and distributed via businesses to staff; <i>[announce end of month presentations]</i>
Sep 30 and Oct 1 2022	PNDP presentations to parish on Plan Policies and Reg.14 mechanism;
Oct 2022	flyer delivered to all houses in the village and distributed via businesses to staff; <i>[formal notice of Reg14 Public Consultation and information on how to see the Plan and how to comment]</i>

- ① 'publishing' involved uploading the document(s) to the PNDP website and then posting links to the document(s) on several relevant FaceBook pages as well as in the Peasmarsh Periodical; copies of any summary were also placed on the permanent noticeboard in the local supermarket and in the Peasmarsh Periodical;

2.2 Evidence Gathering Activities

2.2.1 Surveys

A survey was launched on June 20 2021 and ran until July 31 2021. It was open to all residents and workers of the parish. A paper copy of the survey was delivered to each household and to all known business premises. It was also available online and spare copies were available from the permanent noticeboard in the local supermarket.



Consultation Statement

175 responses were received, about 17% of those over 16 years of age although only 2 people under 20 responded. 90% of the respondents were over 40 and 56% were over 60. There were 23% more responses from females than from males.

A detailed spreadsheet of the results was produced and is available from the website. A summary document was also published [as above] and was discussed in feedback meetings in the Memorial Hall on two days in late September 2021.

A separate questionnaire was delivered to local businesses. 10 responses were received from a total of over 50 businesses canvassed.

2.2.2 Public Consultations / Workshops

Two drop-in Public Consultations / Workshops were held, each one spread over two full weekend days to maximise the opportunities for people to attend. People were free to stay as long as they wished. Neither event had a specific theme. At least three members of the steering group were available at all times.

The focus of the first event was a briefing of stakeholders on the concepts of neighbourhood planning and seeking their views on what the perceived issues were, helped by the survey questions which had already been published.

The focus of the second event was housing and site allocation although all other aspects of the Plan were presented in one way or another and open for discussion.

2.3 Data Sources

The analysis, objectives and proposals in this Plan have drawn on a variety of data sources which include :

- Population, employment, housing, deprivation and car ownership was obtained largely from the Office of National Statistics;
- Housing need was obtained from an independent Housing Needs Assessment undertaken by AECOM, the RDC housing register and public consultations;
- Information about life in the village was obtained from the views of residents expressed in the survey responses, public consultations and workshops plus meetings with key service providers, including the primary school;
- Landscape inputs were obtained from the 2009 RDC Market Towns and Villages Landscape Assessment and from High Weald OANB;
- Flood risk data was obtained from Government sources, assisted by ESCC;

2.4 Communications with Key Utilities

As part of the process to create a robust Neighbourhood Development Plan for the parish it was considered important that discussions took place with key utility organisations : Southern Water, the sewage treatment undertaker, ESCC Flood Risk Management team, the lead local flood authority and UK Power Networks, the electricity distributor.

Several months were lost trying to get responses using the normal communication channels but meetings were eventually held after interventions by the office of the local Member of Parliament, Huw Merriman.



Consultation Statement

2.4.1 ESCC Flood Risk Management

ESCC was the most responsive of the three utilities but, whilst the meeting allowed an understanding of the structure and complexities with respect to flooding and surface water flooding in particular, it became clear that there was no single organisation that could be looked to resolve problems in these areas. ESCC accepts that it has a role in recording larger surface water flooding incidents but didn't define exactly when this might apply and which incidents would be left for the landowner/householders to manage themselves.

The notes of the meeting with ESCC are in Annexe CS1.

2.4.2 UK Power Networks

UKPN was very helpful during this virtual meeting and used screen sharing to explain the issues in the parish with various network maps and data. It explained the difficulties in recruiting and managing power through the NDP period to 2039 but did not hold any hopes for improvement over the period, especially as the demand for electricity will rise considerably as the country moves towards Net Zero. It promised a follow up which never materialised despite repeated requests for the information.

The notes of the meeting with UKPN are in Annexe CS1.

2.4.3 Southern Water

It took 6 months to finally secure a virtual meeting with SW, a meeting which was also attended by representatives from RDC. SW maintained, despite evidence to the contrary as discussed in the Plan and associated Appendix 3, that the foul water network is a 'foul only' system. The company was also very reluctant to follow-up after the meeting although some information was received in due course.

The notes of the meeting with SW are in Annexe CS1.



Consultation Statement

3 Regulation 14 Consultation

The PNDP Steering Group finalised the draft Plan in October 2022 when it was approved for pre-submission consultation by the parish council.

The total documentation was over 560 pages, some of which was in A3 format. It was therefore agreed that the primary method of distribution was to be electronic with a few hardcopy versions of the main Plan document available to be read by parish stakeholders. The documentation and details of how to comment were placed on a dedicated page of the PNDP website.

The Regulation 14 pre-submission consultation ran for a six-week period from October 31st to December 12th 2022.

3.1 Parish

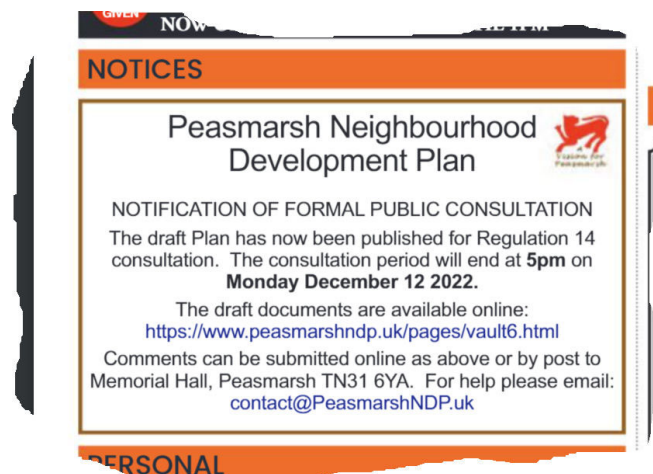
In addition to the electronic documentation, hardcopies of the main Plan to read [but not take away] were placed in the restaurant at Jempson's supermarket and the Memorial Hall was opened for 2½ hours for each of the five Wednesday evenings in November to give stakeholders another chance to read the hardcopy main Plan and associated appendices.

Copies of the Plan were also made available on a loan basis for those who were housebound.

Hardcopy feedback forms were placed in Jempson's at the PNDP notice board and were available during the Wednesday evening sessions in the Memorial Hall.

In support of the consultation a range of publicity actions was taken :

- the PNDP FaceBook page was used to encourage participation throughout the period;
- the Peasmarsh Periodical was used in a similar way;
- a flyer was delivered to every home in the parish explaining how to access the Plan and how to comment;
- public notices were placed on the village noticeboards, including the PNDP board in Jempson's;
- an advertisement was placed in the Wealden Advertiser :





Consultation Statement

3.2 Statutory Consultees

Statutory consultees were notified by email of the pre-submission consultation and how to access the documentation. The following organisations were notified :

3.2.1 Local Government

Rother District Council

East Sussex County Council

Wittersham PC, Ashford District Council and Kent County Council¹

Iden, Rye Foreign, Udimore and Beckley PC's²

3.2.2 National

Homes England

Natural England,

Environment Agency,

Historic England

National Highways

NHS

3.2.3 Utilities

BT, EE, Vodafone, O2, Ericsson and Three

National Grid and UK Power Networks

SGN [gas]

Southern Water and South East Water

3.2.4 Others

Rother Voluntary Action

Action in Rural Sussex

¹ One of the contiguous parishes is in Kent, not East Sussex

² The contiguous parishes in East Sussex



Consultation Statement

4 Summary of Regulation 14 Outcomes

Feedback to the Pre-Submission [Regulation 14] Draft Plan was received from stakeholders, non-stakeholders and other bodies either by email or submitted via a form on the website or by hardcopy feedback form or by letter. The majority of responses were received by email.

Most of the feedback from individuals related to the site allocations.

When the consultation closed the following statutory consultees had responded :

- Rother District Council
- East Sussex County Council
- Historic England
- National Highways
- National Grid
- Southern Water

In addition, Ashford District Council submitted a ‘no comment’ response.

At the same time as the Regulation 14 Consultation, the Plan was subjected to an internal review. Some of the changes made between that consultation and the Regulation 15 submission will have been the result of that internal review.

The feedback received as a result of the Consultation is summarised in the schedules below together with the associated response from the PNDP group and any proposed action taken to amend the Plan. The full feedback is in Annexes CS2 [stakeholders and other individuals] and 3 [statutory consultees].

The section numbering and policy references refer to the Regulation 14 Draft Plan and not those used in the Regulation 15 Draft Plan.

The schedules address each section of the Plan in turn.

4.1 Section 1 : Introduction

Most of the changes made in the Regulation 15 draft of Section 1 were the result of the internal review, mainly the addition of a paragraph to address the Conservation of Habitats and Species Regulations and a new section introducing the structure of the remainder of the Plan.

Feedback was received from RDC, ESCC and some stakeholders :

Issues / Concerns Raised	Steering Group Response / Action
1.1 Context	
Rother DC : The start of para 3 is confusing : NDP's were introduced by the Localism Act 2011 and became a new tier in the planning system. Unsure what 'earlier types' is referring to.	Accepted Change wording to clarify that the plans referred to are Local [or Parish] Action Plans such as that created for Peasmarsh in 2006.



Consultation Statement

1.2 The Peasmarsh Plan	
<p>Marcus Gould :</p> <p>Rother District Council is determined to build in Peasmarsh. It cannot be stopped. That is a given.</p> <p>The process seems to be that WITHOUT the PNDP, the council has free rein to allow building wherever it likes, unrestricted other than by planning law. WITH the PNDP, the council is theoretically restricted in to only building on a limited number of sites.</p> <p>Those limited sites have been selected by the PNDP on a least worst basis. There is no 'best' place to build large numbers of houses in Peasmarsh. The PNDP is a damage limitation exercise.</p> <p>I am concerned that, at any future vote, this may not be clear. There is a risk that villagers will see a vote against the PNDP as a vote against building: It isn't!</p> <p>We cannot vote against building, we can only vote for where houses are built. It will be an emotionally-led vote and I feel this could lead to a misunderstanding of facts.</p>	<p>Thank you. That is a good summation of the purpose of the Plan. When we reach the referendum stage it would be good if you could campaign on that basis.</p>
<p>Mrs S Cavilla :</p> <p>Any future developments should be community led for and by local people and should protect the natural environment.</p>	<p>Thank you : agree, that is what the Plan is for.</p>
<p>Peter Mackay and Vanessa Smith :</p> <p>The Plan highlights some general issues about development in Peasmarsh, namely :</p> <ul style="list-style-type: none"> • The inadequate and unreliable sewage system • A lack of school capacity • The absence of doctors and dentists • The poor public transport provision • The poor telecommunications • The shortage of amenities in general, other than Jempson's, making Peasmarsh a 'corridor' village. 	<p>Thank you : agree. Hopefully the Regulation 15 draft of the Plan makes those points clear.</p>
1.3 Vision and Objectives	
<p>Rother DC :</p> <p>An objective linked to the AONB is recommended considering the parish location, and also it is mentioned in the 'vision'.</p>	<p>Accepted</p> <p>Adjust the objectives to specifically encompass protection of the AONB.</p>



Consultation Statement

<p>East Sussex CC :</p> <p>The vision and objectives should integrate health and wellbeing issues more holistically and comprehensively.</p> <p><i>[suggestions provided]</i></p>	<p>Accepted but the balance of the Plan must be maintained</p> <p>Improve the wording to strengthen health and wellbeing.</p>
---	--

4.2 Section 2 : Peasmarsh : an Historic Rural Parish

Most of the changes made in the Regulation 15 draft of Section 2 are also the result of the internal review. None are major, the main ones being adjustments to the bus service wording to reflect another reduction in that service and the inclusion of some photographs.

Feedback was received from RDC, ESCC and SW :

Issues / Concerns Raised	Steering Group Response / Action
2.4 Transport	
<p>East Sussex CC :</p> <p>Connectivity to Rye railway station is mentioned. Suggest including whether the condition of the route is conducive to active travel</p>	<p>Accepted</p> <p>Add words to explain.</p>
<p>East Sussex CC :</p> <p>We would suggest changing the 'Traffic' subtitle on page 7 to 'Road'.</p>	<p>Accepted</p> <p>Change the subtitle.</p>
2.5 Infrastructure	
<p>Southern W :</p> <p>Change the below in the Foul Water subsection :</p> <p>Southern Water, the responsible authority, <u>advised considers the original design of the system</u> a 'foul only' system even though a considerable number of the properties have a mixed [foul and surface water] system discharging to the sewer.</p>	<p>In an email of Jan 21 2022 SW stated :</p> <p><i>'This sewer network is foul only, ie there are no combined sewers'</i></p> <p>Consider changing 'consider' to 'stated'</p>
2.7 The Local Economy	
<p>Rother DC :</p> <p>Unsure what the start of para 5 means. Avoid personal opinion in the NDP.</p>	<p>Accepted</p> <p>Change wording to correctly convey the meaning.</p>
2.8 Population and Housing	
<p>East Sussex CC :</p>	



Consultation Statement

It is suggested that health intelligence data on population demographics is used to expand on health inequalities in order to see trends and key issues in the parish.	This is now covered by the Equality Impact Assessment [App 1 to the Basic Conditions Statement] Link to the EIA in Section 2.8.
2.9 Education	
Rother DC : In para 5 avoid using personal opinion in the Plan as it's a public document.	Accepted Delete wording.
Rother DC : At the end of para 6 avoid speculation in the Plan.	Accepted Change wording to correctly convey the concerns of stakeholders.

4.3 Section 3 : Landscape, the Environment and Heritage

Some of the changes made in the Regulation 15 draft of Section 3 were again the result of the internal review, the most important of which is the move of the subsection on sustainable transport from Section 4 to this section.

Feedback was received from RDC, ESCC, Historic England, Southern Water and stakeholders :

Issues / Concerns Raised	Steering Group Response / Action
Heritage Assets and Policies L1, Di and D2	
Historic England : Creating a list of non-designated assets would enhance the Plan. <i>We recommend that the formal identification of such non-designated heritage assets is informed by testing against criteria set locally and a brief examination of each site's heritage interest in order to ensure they merit consideration in planning and to inform future decisions to sustain or enhance their significance.</i>	This is a good idea Add a suitable Project to Section 10, Community Aspirations.
Section 3.1 : Introduction	
East Sussex : The section should expand on the benefits to health and wellbeing from the environment. It should acknowledge the potential benefits of increasing physical activity for all ages and abilities through active travel, recreation and play, connected neighbourhoods, also the mental and wellbeing benefits associated with access to nature and quality built and historic environments.	Accepted Adjust words accordingly but don't lose balance of Plan.



Consultation Statement

Policy L1 : Conserve Landscape and Heritage Asset Settings	
<p>Historic England :</p> <p>Suggest that the scope of the policy be expanded to include the conservation and possibly enhancement of designated and non-designated heritage assets as well as their settings.</p>	<p>Policy deleted : text to cover RDC policies EN1 and EN2.</p>
<p>Rother RD :</p> <p>The policy covers two distinct areas: landscape and heritage. We recommend that the Local Plan is revisited, see policies EN1 and EN2, as Planning Practice Guidance advises that neighbourhood plan policies should reflect the 'unique characteristics' of a specific area and not repeat local and national policy.</p>	<p>Accepted</p> <p>Policy deleted : text to cover RDC policies EN1 and EN2.</p>
Section 3.4 and Policy L2 : Protection of Locally Significant Views	
<p>Historic England :</p> <p>Strongly recommend providing a more detailed description of the features that are considered to contribute positively to the character of each view and that merit its consideration in planning to inform implementation of the policy (ideally as an appendix to the Plan).</p>	<p>Accepted</p> <p>Prepare an appendix setting out the nature of each view and why it was selected and also include the Local Green Spaces [policy L5] on the same basis.</p>
<p>Rother DC :</p> <p>We recommend that the views should be listed within the policy. It would be helpful for the decision maker to have the associated map by the policy.</p> <p>Is there evidence to support the selection of the views to demonstrate they have been identified by the community as valued and important?</p> <p>Also, please note that as the parish is located within the HW AONB, all the surrounding countryside has landscape value and care should be taken in the wording or supporting text to recognise this, as well as the fact that not only views that can be enjoyed by the public must be protected.</p>	<p>Accepted</p> <p>List views in the policy and move all maps into the main document.</p> <p>See above re : new appendix</p> <p>Accepted</p> <p>Ensure that the wording conforms.</p>
<p>East Sussex :</p> <p>The policy justification could include the mental health and wellbeing benefits of protecting locally significant views.</p>	<p>Accepted</p> <p>Adjust words accordingly but don't lose balance of Plan.</p>



Consultation Statement

Policy L3 : Protection of Trees and Woodland	
<p>Rother DC :</p> <p>This policy would be strengthened by listing specific woodlands and veteran trees in Peasmarsh where possible.</p>	<p>Accepted</p> <p>Adjust words where possible.</p>
Policy L4 : Protection of Biodiversity	
<p>Rother DC :</p> <p>We support this policy which addresses biodiversity off-setting and aims to ensure off-setting sites are found within the parish. Add wording to reflect this intent.</p>	<p>Accepted</p> <p>Reword as required.</p>
Section 3.5 Habitats, Land Use and Biodiversity / Policy L5 : Protection of Habitats	
<p>Rother DC :</p> <p>Place the table in the supporting text to allow decision makers to easily see the list.</p>	<p>Accepted</p> <p>Adjust layout accordingly.</p>
<p>Southern W :</p> <p>Change the second paragraph after policy L5 :</p> <p>This threat to human health and the environment is a direct result of the responsible company not calculating system capacity on the basis of a combined sewer [both foul and surface water] even though it knows and accepts that to be the case because the older houses in Peasmarsh village have combined discharges a concern directly resulting from the drainage concerns. This is discussed in more detail in Section 4.3.5 and a policy [14] is proposed e established.</p>	<p>See response in Section 2.5 : SW states that the system is foul only.</p> <p>In an email of May 9 2022 SW stated : <i>‘...please understand that our reference to the original design of the sewer (being foul only) also links to the SuDS drainage hierarchy – a key consideration for developments today.’</i></p> <p>SuDS drainage is a modern comment : the issue is to do with housing stock built before there was a legal requirement to separate foul and surface water drains [which seems to have occurred in about 1970].</p> <p>The existing wording is a reasonable statement of the situation and does not require changing.</p>
<p>John and Jean Fisher :</p> <p>Impact on wildlife and ancient trees is also a concern.</p> <p>Nesting birds live in the old trees abutting the proposed site and there is an old oak tree. It is highly likely preparation of land for building will disturb both trees and wildlife.</p> <p>We reside close by and have both newts and stag beetles in our garden. Impact on the wildlife would be considerable.</p>	<p>Thank you for the comments. It is not clear which site you have in mind but, in general, that is why the Plan insists on an increase in biodiversity on any development site.</p> <p>No particular word changes needed beyond the updated Plan.</p>
Policy L6 : Protection of Local Green Space	



Consultation Statement

<p>Rother DC :</p> <p>We recommend listing the proposed local green spaces within the policy and place the map within the section. Is there evidence to support the selection of spaces?</p>	<p>See earlier re : new appendix</p>
<p>Southern Water :</p> <p>Additional words are required in this policy in order to comply with NPPF 147, 148 and 150 :</p> <p><i>The Plan designates local green spaces as shown on Map 3.11. Development proposals within the designated local green spaces will not be supported, <u>except in exceptional circumstances, for example where it relates to necessary utilities infrastructure and where no reasonable alternative location is available.</u></i></p>	<p>Accepted in principle but it doesn't require a complex addition.</p> <p>Add wording to require compliance with NPPF.</p>
<p>Mrs S. Cavilla :</p> <p>Protecting local green space is very important as is Policy L1 conservation of landscape and heritage assets. Peasmarsh is a rural village not a town!</p>	<p>Thank you</p> <p>No further action required.</p>
<p>Section 3.6 and Policy L7 : Retain and Improve Public Access</p>	
<p>Rother DC :</p> <p>This policy is a good opportunity to identify routes that you would like to encourage and see implemented.</p>	<p>Agreed although in practice this subsection will change substantially with the introduction of sustainable transport</p> <p>Include list of key routes [at least in supporting text].</p>
<p>East Sussex CC :</p> <p>Suggest reference is made that green infrastructure could include dedicated walking and cycling routes compliant with the Government's cycle design guidance</p> <p>Suggest greater mention is made about active travel and providing walking and cycling infrastructure to connect people with places e.g. from homes to key services and facilities.</p> <p>The section should expand on the health and wellbeing benefits of people's access to nature by stating that it will increase physical activity leading to both physical and mental benefits.</p> <p>It is suggested that the first paragraph in section 4.4.1 regarding supporting healthy</p>	<p>Accepted</p> <p>Accepted</p> <p>Accepted</p> <p>Possibly duplicate the para but do not move.</p>



Consultation Statement

lifestyles is more appropriate within this section.	Adjust words accordingly but don't lose balance of Plan.
<p>Southern W :</p> <p>Urban creep presents an ever-increasing challenge to communities. We therefore strongly support the following wording within this policy :</p> <p><i>The Plan encourages green infrastructure for all developments. Green infrastructure outside of new developments will also be supported.</i></p>	<p>Supporting statement</p> <p>No change required.</p>
<p>Dominic Manning :</p> <p>You mention 'traffic-free' routes. Maybe there is scope to add or amend this to read 'active travel' routes. This would enable consideration of other non-motorized means of physical travel other than walking or running, to include for bicycles, wheelchairs and scooters. This said, I'm aware this is nowadays less clear cut, as these can all be powered by batteries!</p>	<p>Thank you : this is being done as a result of internal review and other comments.</p> <p>No particular word changes needed beyond the updated Plan.</p>

4.4 Section 4 : Infrastructure

The most important change from the internal review is the move of the subsection on sustainable transport from this section to Section 3.

Feedback was received from RDC, ESCC Southern Water and various stakeholders :

Issues / Concerns Raised	Steering Group Response / Action
Section 4 General	
<p>East Sussex CC :</p> <p>Infrastructure, including tourism infrastructure, should consider EV charging at the earliest stage.</p> <p>Challenges remain in relation to power supply to the Parish, therefore supporting other types of e-transport (bikes scooters etc), could be considered, if the risks involved can be overcome.</p>	<p>The Plan does consider EV charging in various sections, particularly Sections 8 [policy D4] and 10 [project 3].</p> <p>Consider adding to Section 4 and 5 [tourism] too.</p> <p>OK but sustainable transport moved to Section 3</p> <p>Incorporate into Section 3.</p>
<p>Jeremy Patridge :</p> <p>Development in this village will be detrimental to the existing available infrastructure. A small level of development may be feasible but</p>	<p>Agree : the existing infrastructure needs bringing up to be fit for purpose.</p> <p>No change required.</p>



Consultation Statement

numbers that have been mooted would not be so or practical.	
John and Jean Fisher : The facilities and infrastructure in the village in our view would struggle to support a further housing development.	See above.
Ethical P : The Plan allocates a modest level of development and severely restricts development per site. New development will be required to facilitate the investment and improvements sought.	Correct : the existing infrastructure needs bringing up to be fit for purpose. No change required.
Section 4.3.1 : General	
Southern W : Change first paragraph : Peasmarsh is very much in need of infrastructure improvements, particularly in connection with both foul and surface water drainage.	Disagree No change required.
Policy I1 : Recording of Infrastructure Issues	
Rother DC : This isn't a land use policy but could be located in the 'Community Aspirations' section of the PNP.	Accepted Move to Section 10 and adjust supporting text accordingly.
Policy I2 : Bus Service	
Rother DC : A large portion of this would sit better in the 'Community Aspirations' section however the policy could read that 'Development will be supported when proposals include the provision of additional bus stops/bus priority lanes/community transport solutions...' Also, 'The PNP supports demand responsive transport...'. Expand the policy remit to cover modes of sustainable transport. Unsure what 'All of the above will be undertaken at district, county and national level' means.	This policy is being moved to Section 3 with emphasis on active and sustainable passive travel. Review words in the light of these comments once moved.
Mrs S. Cavilla :	



Consultation Statement

Transport is poor so cars are required to reach surgeries, dentist and hospitals	Thank you. Taken into account. No further change required.
Policy I3 : Improving Road Safety and Traffic Impact	
<p>Rother DC :</p> <p>This could be expanded into a 'Sustainable Transport' policy as the issues mentioned are due to an absence of good pedestrian and cycle routes to allow families to walk/cycle to the school.</p> <p>Criterion iii) could be strengthened by highlighting a route where this can be proposed and state the PNP supports this proposal.</p>	<p>The absence of good routes is only part of the problem and doesn't address the issue of speeding through-traffic.</p> <p>Review wording.</p>
<p>East Sussex CC :</p> <p>This policy is a useful inclusion and pursuing this is supported. Cycling could be separated out into a specific policy to cover improved connectivity through new walking and cycling infrastructure.</p>	<p>Accepted but active travel belongs in Section 3.</p> <p>Consider cross-referencing between sections.</p>
<p>Jeremy Patridge :</p> <p>The condition of the roads through the village is disgusting with useless patching being washed out in the frequent heavy rains of late.</p>	<p>Agree : this is one aspect of Project 2 in Section 10.</p> <p>No change required.</p>
<p>Deborah Ghate :</p> <p>(iii) Improving road safety... mitigate the effects on non-motorised transport users... including pedestrian footpaths and cycle ways</p>	<p>Accepted : the next draft of the Plan is strengthened in this respect but in Section 3.</p> <p>No change required here.</p>
Section 4.3.6 and Policy I4 : Sewage System Improvement	
<p>Southern W :</p> <p>Change part of the first paragraph :</p> <p>SW states that the Iden works treat sewage from Rye [presumably part of], Iden, Peasmarsh, Playden, Camber and Rye Foreign <u>Bowlers Town and Houghton Green. The village Peasmarsh</u> pumping station is on the site of the old Peasmarsh <u>wastewater</u> treatment plant.</p>	<p>SW's draft Drainage and Wastewater Management Plan for the Rother Catchment [https://www.southernwater.co.uk/media/3875/rother-dwmp-strategic-context.pdf] states :[Table 1 Page 6] that Iden WTW serves the communities of : Rye, Iden, Peasmarsh, Playden, Camber, Peasmarsh, Rye Foreign <i>[sic]</i></p> <p>Change 'village' to 'Peasmarsh as the station does also serve part of Rye Foreign.</p>
<p>Southern W :</p> <p>Change the second paragraph :</p>	<p>Disagree</p>



Consultation Statement

<p>There are <u>The parish is concerned with</u> two primary issues in respect of foul water disposal and a third important one:</p> <ul style="list-style-type: none"> • the limited sewer network; • the capacity of the system; o the power supply to the pumping station; 	<p>No change required.</p>
<p>Southern W :</p> <p>Change entire 'Limited Network' subsection :</p> <p>Map 4.2 [over] shows the main extent of the sewer network in Peasmarsh village together with the surface water drains under SW ownership. The company states that it doesn't know all of the details of its network which is why there are some parts of the network not connected to the pumping station. <u>Southern Water maps show the public sewer line networks, not private sewers (that typically lie within property boundaries for example). The public sewerage system is also more extensive than shown on water company sewer maps due to the transfer of a large number of formerly private sewers into public ownership in 2011 (for more information please see https://www.southernwater.co.uk/help-advice/sewers-and-drains/transfer-of-private-sewers. Additionally, the map does not show any private connections to the sewers.</u></p> <p>It can be seen <u>Southern Water maps indicate that whilst most of the eastern end of the village is connected to the main sewer network has the possibility of a sewer connection, which The network extends to the western end is not well served: the sewer does not even reach all of the bend in School Lane and stops at the top of Cock Hill past the caravan site and properties close to the junction of Tanhouse Lane and on Main Street.</u></p> <p>SW acknowledges that it has a statutory obligation to serve new development. <u>When assessing and commenting on planning applications Southern Water will take account of performance of the</u></p>	<p>The map is SW's official record of the sewers in Peasmarsh.</p> <p>In an email of 21 Jul 2022 stated :</p> <p><i>These lines have been mapped following investigation of a blockage but they haven't mapped the connection to the main sewer.</i></p> <p>In the same email when asked how the houses in Old Hop Garden connect to the foul system [there is no foul sewer on the map] SW stated :</p> <p><i>These properties will connect into the foul sewer already mapped but as the houses were built after 1937 this connection is private (and so would not have been mapped).</i></p> <p>So, as a minimum SW has done nothing about familiarising itself with the assets it is responsible for in the 11 years since becoming responsible – and possibly for many more years if the sewer in the street was always part of the public network [as might be expected].</p> <p>SW's official record shows that the sewer stops as described. The last chamber is 5901. If the sewer <u>does</u> extend to near the junction of Tanhouse Lane and Main Street why is it not shown on the map and where is the WWPS/FPS because there is a ~10m drop between the top and bottom of Main Street?</p> <p>Beyond the junction of the two roads there are about 35 houses close to Main Street / Mackerel Hill / Mill Lane that should be serviced with a foul water connection but are not.</p> <p>Consider possible text changes.</p>



Consultation Statement

<p><u>public sewer network and identify where reinforcement of the system may be required to ensure there is no unacceptable reduction in the level of service as a consequence of growth. Developers typically pay a standard connection fee, more information is available here https://www.southernwater.co.uk/help-advice/connection-charging-arrangements</u></p>	
<p>Southern W :</p> <p>Change entire ‘Capacity’ subsection :</p> <p>The fundamental problem <u>Our concern with the sewer system capacity is that the SW calculations for growth assume that the system is for foul water only while accepting that a number fairly high percentage [there is no known data on what that might be] of homes connected to the system have combined outflows because they were built before combined systems were not permitted.</u> <u>surface water drainage to the system, Building Regulations having permitted connections to the foul network. With both urban creep and climate change increasing surface water run off over time this is a major driver for sustainable urban drainage systems - the design of which aims to prevent surface water from entering sewers not designed to convey it, whilst also protecting the natural water cycle into the future.</u></p> <p>One result of that incorrect assumption is that <u>The public sewer maps were developed by local authorities to show the original type of sewerage system installed. The system type is a water company’s best guide to what flows the system was designed to convey. The maps show that the Peasmarsh system was intended as a foul only system. However, as development progressed Building Regulations subsequently permitted drainage connections from new impermeable surfaces to the foul network. This means that since the original construction of the drainage s</u></p>	<p>This is not about an occasional home having a combined system : there are a considerable number of homes built before 1970 when the change in regulations came into force.</p> <p>Equally it is not about urban creep and future problems : this is about current problems.</p> <p>On the face of it, SW took over the system some 33 years ago and has done nothing about getting to know the system.</p>



Consultation Statement

<p><u>system, as urban creep and climate change have increased, volumes of rainwater are draining into the (intended) foul only system.</u></p> <p><u>An overflow exists at the pumping station to relieve high flows arising at times of rainfall. The pumping station recorded overflow spills to the local stream 38 times for a total of 193 hours during 2021 alone. Southern Water is identifying the improvements required to sewerage systems in accordance with DEFRA guidance. At present there is no limit on the number of times the overflow is permitted to operate. Southern Water provides more information about storm overflows and the work it is progressing here h tps://www.southernwater.co.uk/our-performance/storm-overflows.</u></p> <p>The capacity problem is not limited to the pumping station and its delivery line to Iden however. Some people experience sewage flooding in their gardens at not-infrequent intervals and instances of internal flooding occur from time to time. The company cannot ascertain whether its drains are of sufficient capacity because it would need to undertake calculations to do that. Nonetheless, the company says that data compiled from years of investigating customer contacts provides here is no evidence of under-capacity locally. even though Observation in the village suggests that this is not the case. A small number of reports of local incidents have been reported to it by the Parish but it maintains across these examples investigation did not identify hydraulic overloading. Examples included blockage issues outside of its preventable control. The Drainage is a critical matter, fundamental to any new developments and must be resolved before further development is undertaken.</p> <p><u>Risk based catchment screening is a process completed at the outset of developing a Drainage and Wastewater</u></p>	<p>SW wants to strike out the words</p> <p><i>The company cannot ascertain whether its drains are of sufficient capacity because it would need to undertake calculations to do that</i></p> <p>However, in an email of Jul 21 2022, when asked whether the sewer diameter was correct, SW stated :</p> <p><i>We can't answer that question for you directly as capacity checks involve modelling</i></p> <p>'Modelling' is how an engineer describes undertaking calculations/</p> <p>Consider possible text changes.</p>
--	--



Consultation Statement

<p><u>Management Plan. It is used to identify the sewer catchments likely to be most vulnerable to future changes, such as climate change or new development, so effort can be focused accordingly. The tabulated results of Southern Water's 2020 Baseline Risk and Vulnerability Assessment tabulate this risk comparison for the Rother catchment. show a different story.</u></p> <p>Please remove the following sentence as it refers to '1990 understanding' and circumstances will have changed since. It is also not linked to any evidence source that we can review to understand how the 'planning inspectorate noted' this :</p> <p>It is understood that as far back as 1990 the planning inspectorate noted that the local system was already close to capacity and since then many new houses have been added.</p>	
<p>Southern W :</p> <p>With respect to the policy itself, we could not find policy wording to support the general provision of new or improved utilities infrastructure. Change the words to :</p> <p><i>New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community subject to other policies in the plan.</i></p>	<p>Disagree</p> <p>No change required.</p>
<p>Rother DC :</p> <p>Policies must be positively worded 'positively prepared' (NPPF) and not restrictive in the manner of this policy. Reword as 'Development proposals which have undergone an independent capacity check will be supported...'</p> <p>The final sentence is unclear: 'district, county and national level'.</p>	<p>Accepted</p> <p>Change wording.</p> <p>The intent is that Peasmarsh will work with RDC, ESCC and the constituency MP.</p> <p>Change wording to reflect this.</p>
<p>East Sussex CC :</p> <p>It is not clear on what is meant by independent capacity checks, whether</p>	<p>Accepted</p>



Consultation Statement

<p>this means independent from the developer or Southern Water.</p>	<p>Clarify wording.</p>
<p>Jeremy Partridge : The drainage is inadequate and further development will jeopardise the already inadequate performance of the system.</p>	<p>Accepted and hence Policy I4. No change required.</p>
<p>John and Jean Fisher : Sewage and drainage is an issue, how the new properties will impact on this is a cause for concern and potential impact for flooding/ surface water on adjoining properties and land. There is potential for this from such a development as extremes of weather become the norm.</p>	<p>See response above. No change required.</p>
<p>Section 4.3.6 and Policy I5 : Surface Water Drainage</p>	
<p>East Sussex CC : It is noted at page 29. 'Indeed, it is surprising that SW has some responsibility in the village as shown in Map 4.2.'. We are not clear on why this is surprising.</p>	<p>It was a surprise because the parish had no knowledge of this. It makes reporting more difficult with split responsibilities. Re-word this.</p>
<p>East Sussex CC : The use of '1:10ⁿ year chance of flooding' is less than precise. The correct definition for Zone 1, for instance, is having a less than 0.1% annual probability of river or sea flooding.</p>	<p>Change 'year chance' to 'annual probability'.</p>
<p>East Sussex CC : The first sentence of paragraph 4 in this section would be better expressed as : <i>Surface water, groundwater and ordinary watercourse flood risk in East Sussex is managed by ESCC in its role as the Lead Local Flood Authority.</i></p>	<p>Accepted Change wording.</p>
<p>East Sussex CC : It is suggested that paragraph 6 is changed to : <i>ESCC observes that much information is not readily available, has been lost in preceding years or has yet to be developed and historical records may be needed to identify old springs and similar.</i></p>	<p>Accepted Change wording.</p>
<p>Rother DC :</p>	



Consultation Statement

<p>It's not clear how you expect this to be measured. How does a DM officer measure this when determining a planning application for a site in Peasmarsh?</p>	<p>Accepted Change wording to demand full SuDS measures.</p>
<p>Southern W : Delete from the first paragraph : Indeed, it is surprising that SW has some responsibility in the village as shown in Map 4.2.</p>	<p>See reply and action to ESCC comment above</p>
<p>Southern W : Add to the third paragraph : <u>Rother District Council's last published Strategic Flood Risk Assessment (SFRA) cites the poor channel maintenance of private ditches as the cause of historic flooding incidents in Peasmarsh. An updated SFRA is also in development.</u></p>	<p>Not correct : the latest SFRA is dated February 2021. Peasmarsh is only mentioned once in the SFRA [Table 6.3] and that is as a location sensitive to increased rainfall intensities, specifically Main Street, School Lane and Farleys Way. There is no mention of poor channel maintenance of private ditches as the cause of historic flooding incidents in Peasmarsh. No change required.</p>
<p>Southern W : Add after the seventh paragraph : <u>There are also some surface water sewers in the Peasmarsh area, owned and maintained by Southern Water as shown in Map 4.2. This is not an extensive network of surface water sewers, but where these have been constructed to an adoptable standard to serve new developments, and subsequently adopted, they are shown on the public sewer map.</u></p>	<p>Accepted Review words in this location and adjust if necessary.</p>
<p>Southern W : Add the following to the end of the policy wording : <u>and all development must give priority to the use of SuDS.</u></p>	<p>See reply and actions to RDC comment above.</p>
<p>Mrs S. Cavilla : Flooding and sewage are major issues and this is not helped by the many natural springs in the village such as the one on the left hand side going up School Lane. Recently after heavy rainfall there also appeared to be a problem on Main Street with a natural</p>	<p>Thank you.</p>



Consultation Statement

<p>spring on the left hand side going towards the Maltings.</p> <p>When turf on Tanyard field was cut and sold this action resulted in many properties on Main Street being flooded twice - once before Christmas and a few weeks after Christmas as the water swept down the field over the clay subsoil. Also previous applications for Tanyard field have been rejected due to water and sewage problems which are still not resolved.</p>	
<p>Policy 16 : Power Supply</p>	
<p>Rother DC :</p> <p>Criterion ii) would benefit from editing for clarity.</p> <p>This policy could link to policy D4: Energy Efficiency and Sustainability.</p>	<p>Accepted</p> <p>Change wording to suit.</p>
<p>Dominic Manning :</p> <p>You do well to emphasise the precariousness and inadequacy of the services serving the village, and the extent to which this puts in doubt any new development. I think you should add a paragraph relating to landlines. It is proposed to discontinue 'analogue' landlines by the end of 2025 so if there is a power cut, landlines will no longer work. The advice then is to use a mobile, however these will not work either unless mobile masts have adequate power back-up. It will require vulnerable residents to purchase satellite phones costing in excess of £600!</p>	<p>Thank you.</p> <p>Consider adding some appropriate words.</p>
<p>Policy 17 : Telecommunications</p>	
<p>Rother DC :</p> <p>Re-word to make clear what the policy intent is. Is the intent to manage the location of apparatus?</p>	<p>Accepted</p> <p>Change wording to suit.</p>
<p>Deborah Ghate :</p> <p>I strongly agree with promoting improvements to telecoms incl cell phones and broadband</p> <p>This is vitally important for the local economy as well as many other aspects of health and social wellbeing. I feel this policy should be strengthened and made</p>	<p>Thanks you for the input.</p> <p>Review wording to see how this subsection can be strengthened. It may best be done in Section 5.</p>



Consultation Statement

<p>more pro-active since some of the most rural properties in the parish are often without any comms at all, sometimes for quite extended periods. Broadband here is mostly non-existent. Those of us who work or run businesses from home are often badly affected and it inhibits expansion and growth.</p>	
<p>Policy I8 : Developer Obligations</p>	
<p>Rother DC : We support this policy.</p>	<p>Thank you.</p>
<p>Mrs S. Cavilla : I strongly agree with this policy. When future developers are being considered they should be assessed against their track record of how they deal with problem tenants and the impact on the area and other residents.</p>	<p>Thank you.</p>
<p>Ethical P : A “perceived capacity constraint” is not demonstrable or quantifiable and therefore would not be a material planning consideration.</p>	<p>Accepted but note RDC view above. Review wording.</p>
<p>Section 4.4.1 : Health Services</p>	
<p>East Sussex CC : Access to health services should include walking and cycling as well, where possible.</p>	<p>This is something which could only be possible if the parish had a surgery : something which the NHS has indicated will not happen without a population of at least 8,000 [and the parish has about 1200 residents]</p>
<p>Jeremy Patridge : The absence of a surgery is not good for any expansion of housing which of course will contain a level of social accommodation. Influx of more families will put unwanted pressure on the local primary school also.</p>	<p>Unfortunately the national policy is that the NHS will not support a doctor and surgery unless the population is at least 8,000 – see above</p>
<p>Ethical P : The Plan states that there is an existing 24-bed care home within the village at Peasmarsh Place. This is an inaccurate description : it is 0.5km to the southwest of the village centre.</p>	<p>Accepted Change ‘village’ to ‘parish’.</p>
<p>Ethical P : This section indicates that 16 beds of the 24 available are currently</p>	



Consultation Statement

<p>occupied at Peasmarsh Place Care Home.</p> <p>Peasmarsh Place is a private care facility and cannot be considered as part of an assessment of public care provision in the area.</p>	<p>This is incorrect : the Plan states that, <u>at the time of the CQC 2022 assessment</u>, 18 beds were occupied.</p> <p>No change required.</p> <p>Section 4.4.1 is not an assessment of public care provision.</p> <p>No change required.</p>
<p>Ethical P :</p> <p>Not all the care homes in the district offer elderly/retirement home residential care.</p> <p>No evidence has been provided to demonstrate that there is not a requirement for additional local care services provision.</p> <p>Additionally, there is no 'cap' on the number of specialist care services that can be provided within an area.</p> <p>Section 2 of the Plan provides anecdotal evidence that people leave the village as they age.</p> <p>This anecdotal evidence clearly suggests that there is insufficient specialist housing or care services for older people within the village.</p> <p>This is further supported by the Plan which identifies that the village has a shortage of smaller homes preventing older residents from downsizing within the existing village.</p>	<p>The Plan is not a market assessment of need or availability.</p> <p>No, that is one interpretation but, equally, people want to be near their children in old age or need affordable services [the income profile of the parish is totally ignored in the assumption made].</p> <p>Downsizing is nothing to do with care : it is for people able to look after themselves.</p> <p>No change required.</p>
<p>Section 4.4.2 and Policy I9 : Access to High Quality Secondary Education</p>	
<p>Rother DC :</p> <p>This isn't a land use policy and may be better placed in the 'community aspirations' section.</p>	<p>Paragraph 28 of the NPPF states that non-strategic policies should be used by LPA's and communities to set out more detailed policies including, <i>inter alia</i>, the provision of infrastructure and community facilities at a local level.</p> <p>No change required.</p>
<p>East Sussex CC :</p> <p>We note that the parish would like to see sixth form provision added to either Rye College or Robertsbridge Community College. Our pupils forecasts take account of the latest housing completions and trajectory information</p>	<p>This comment ignores the fact that most families 'vote with their feet' and send children to Kent [Homewood] to be educated at a school with a 6th form. Presumably those pupils don't show in the ESCC statistics.</p>



Consultation Statement

<p>for the area provided by Rother District Council earlier this year. On this basis, we have no particular comments to make at this stage</p>	
--	--

4.5 Section 5 : Business and the Local Economy

Internal review has resulted in some of the changes in this section of the Plan, the most important of which is the replacement of outdated use classes with current ones in Policy E1.

Below is a summary of the various external comments received, the sections to which they relate and the action taken :

Issues / Concerns Raised	Steering Group Response / Action
General	
<p>Ethical P :</p> <p>The Plan states the economy of Peasmarsh is largely centred around agriculture and tourism, with the sole retail provision being the Jempson’s campus but the majority of residents in Peasmarsh work in the Education/Health sector with relatively low percentage of the population being employed in Agriculture and Tourism.</p>	<p>Which shows that most people work away from Peasmarsh which is a dormitory village. Mixing the two sets of data ignores the difference between local employment and economy.</p> <p>No action required.</p>
<p>Ethical P :</p> <p>The Plan has no existing designated commercial, retail or business area so no employment use provision has been made which is contrary of Objective 1 to encourage the expansion of the local retail and service provision.</p>	<p>Although no particular site has been designated for additional commercial, retail or business use, the Plan recognises that there are opportunities for further business development within the parish that would not need specific new designations to be made.</p> <p>No action required.</p>
Policy E1 : New Business Space Development	
<p>Rother DC :</p> <p>Identifying a suitable site/sites would strengthen policy E1.</p> <p>List the use classes you’re referring to in the supporting text for clarity</p>	<p>The problem with identifying sites is that they are likely to come as windfalls from the various farms in the parish rather than from greenfield development.</p> <p>Expanding on the suitable use classes in the supporting text makes sense.</p> <p>Add comment about use of brownfield sites and add use classes to the supporting text.</p>



Consultation Statement

<p>Dominic Manning and Ethical P :</p> <p>This references use classes A1-A5, however these were revoked as of 1.9.2020 so needs updating to current Use Classes.</p>	<p>Thank you. This error was also identified by the internal review and corrected.</p> <p>No further action required.</p>
<p>Policy E2 : Adaptation of Existing Buildings for Live/Work</p>	
<p>Rother DC :</p> <p>Working at home is not considered as use class E and extensions / outbuildings are currently covered by the DaSA policy DHG9.</p> <p>If the intent is to facilitate outbuildings that are more than 20m from the main building a re-worded policy could be valid.</p>	<p>Accepted</p> <p>Reword the policy as outbuildings could well be >20m from the main building.</p>
<p>Ethical P :</p> <p>The policy seeks to allow greater leeway for the development of extensions and outbuildings to existing residential properties, contrary to the aims and objectives of the Plan, particularly regarding the protection of the AONB.</p>	<p>Accepted</p> <p>Review words to ensure AONB is protected.</p>
<p>Policy E3 : Rural Building Conversion for Business Use</p>	
<p>Rother DC :</p> <p>Consider whether this adds to the existing policy RA4 : Traditional Historic Farm Buildings? The existing policy is robust and this may undermine it.</p> <p>Policy H3 states that building conversion into residential will be supported. Which is the priority?</p>	<p>Policy RA4 doesn't cover all of the points raised in policy E3</p> <p>Consider making E3 supplementary to RA4 and build-in a priority wrt H3.</p>
<p>Ethical P :</p> <p>This policy supports the conversion of rural buildings "not in an isolated location where there is no nearby built development and are capable of conversion rather than requiring rebuilding". Thiat is severely limiting and contrary to NPPF paragraphs 119 to 123 on making effective use of land.</p>	<p>Accepted</p> <p>Delete criterion.</p>
<p>Policy E4 : Promotion of Sustainable Tourism</p>	
<p>Rother DC :</p> <p>How will the first criterion be quantified by a decision maker/DM officer?</p>	<p>Accepted</p> <p>Adjust words to suit.</p>
<p>East Sussex CC :</p>	



Consultation Statement

<p>Sustainable tourism planning needs environmental sustainability so new tourism infrastructure should include the consideration of active travel and EV charge point's at the earliest stage.</p>	<p>The Plan includes careful consideration of active travel and EV charging. No action required.</p>
<p>Ethical P : Policy E4 seeks to support the development of tourism facilities, including the increase of tourist accommodation, provided the proposal does not result in a reduction in parish housing stock. Given that the proposed Plan open <i>[sic]</i> admits that it cannot satisfy the full housing needs of the plan should prevent holiday accommodation from being created by any change of use applications within Peasmarsh Village, while the restrictions of proposed would ensure that it is difficult to convert lone buildings or build accommodation outside of the village. As such the policy stands contrary to the Housing aims and objectives of the plan.</p>	<p>The creation of a neighbourhood development plan is a democratic process. The Plan does not openly admit [presumably what the respondent meant by 'open admit'] : it reflects the wishes of the majority of stakeholders. The second part of the comment repeats the comment already made above. No action required.</p>

4.6 Section 6 : Housing

Changes in this Section of the Plan are the result of internal review as well as external comments received.

Below is a summary of the external comments received, the sections to which they relate and the action taken :

Issues / Concerns Raised	Steering Group Response / Action
Policy H1 : Housing Mix	
<p>Rother DC : Existing policy LHN1 : Achieving Mixed and Balanced Communities is more robust than this policy which may undermine it to some extent. Do you have the evidence to support the need for 1 and 2 bed homes?</p>	<p>LHN1 is a generic policy for the whole of Rother. Policy H1 is specific to the current situation in Peasmarsh and reacts to all of the evidence in AECOM's Housing Needs Assessment. Reword to make this clear while reinforcing LHN1</p>
Policy H2 : Rural Exception Sites	
<p>Rother DC : Consider if this policy adds anything to Local Plan policy.</p>	<p>Yes, it does : policy DHG2, contemplates that, 'in exceptional circumstances', permission 'may' be granted if, inter alia, a local need for affordable housing is proven. This Plan demonstrates that exceptional circumstances exist and proves that there is a need for affordable housing</p>



Consultation Statement

	No action required.
Policy H3 : Conversion of Rural Buildings to Residential Use	
<p>Rother DC :</p> <p>Does this policy add to Core Strategy policy RA4?</p>	<p>Policy RA4 doesn't cover all of the points raised in policy H3.</p> <p>Consider making H3 supplementary to RA4 and build-in a priority wrt E3.</p>
<p>Mrs S. Cavilla :</p> <p>I strongly agree with this policy.</p> <p>Rather than build on greenfield sites convert rural buildings to residential use. Redundant buildings should be re-used together with brownfield sites and infill rather than greenfield sites which have been used for crops and grazed by sheep and cows for many years.</p>	<p>Thank you.</p>

4.7 Site Allocation

Changes in this Section of the Plan are the result of internal review as well external comments received.

Below is a summary of the external comments received, the sections to which they relate and the action taken. Many of the comments received were with respect to this section of the Plan so the list below is rather extensive. A group of residents and non-residents sent in a standard letter with respect to Cornerways. The group is listed below as 'Multiple Respondents', the names of the people concerned being listed with a copy of the letter in Annexe CS2 :

Issues / Concerns Raised	Steering Group Response / Action
General	
<p>Rother DC :</p> <p>PM01 and PM02 are both proposed as rural exception sites of 10 dwellings. Exception sites would not normally be allocated.</p> <p>We understand that the steering group consider the exception sites as integral to the narrative of the Plan and have been identified in this way to allow for affordable housing. The PNP can allocate the sites for wholly or substantially affordable housing (as per Policy LHN4 of the Core Strategy), although neither of the sites are "within or adjacent to the settlement boundary" and so would not comply with Policy LHN4.</p>	<p>Accepted in principle</p> <p>It is noted that LHN4 refers to a settlement boundary, not the development boundary and clearly the former is much more extensive than the latter which means that the sites are compliant.</p> <p>Adjust wording accordingly.</p>
<p>Rother DC :</p>	



Consultation Statement

<p>PM03 and PEA01 are not allocated “but could become available in the longer terms should suitable vehicular access be found”. RDC supports this proposal subject to access and other assessments on the sites.</p>	<p>Accepted No change needed.</p>
<p>Ethical P : Submission made on behalf of Peasmarsh Country Care Home Ltd, an employer, landowner and developer in the village and the wider Rother district, providing essential older persons care services to the local community.</p>	<p>There is no such company registered with Companies’ House No action needed.</p>
<p>Policy S1 : Development Size</p>	
<p>Rother DC : The justification for this policy is flawed as on pages 55-56 the PNP incorrectly interprets the meaning of “major” development in the NPPF, noting that “the definition is devolved to the decision-maker in order to allow a reduction in the limits [of 10 dwellings] should the nature of the designated area justify that.</p>	<p>The supporting text and policy need to be reviewed. Review wording.</p>
<p>East Sussex CC : A Transport Report is ordinarily required to support proposals of 5-35 dwellings but would unlikely require junction assessments as the impacts are unlikely to be significant. Any site proponents are recommended to enter into pre-application discussions with the Highway Authority to discuss the scope of a Transport Report before a planning application is submitted.</p>	<p>The Plan is not a planning application No action required.</p>
<p>Policy S2 : Allocated Sites</p>	
<p>Historic England : Where a potential site allocation affects a designated heritage asset, such as a listed building or conservation area (including effects for its setting), the impact of those effects should be considered in terms of any harm or benefit that could be provided to their significance, including but not limited to the significance that justifies their designation.</p>	<p>Accepted and applied within the Plan. No action required.</p>
<p>Rother DC : This policy could unnecessarily restrict windfalls. The Plan doesn’t deliver windfalls, windfalls happen regardless, however the estimate for 20 dwellings to come forward as windfalls is reasonable.</p>	



Consultation Statement

<p>Is there evidence for the last sentence of Policy S2 (allocated sites) which says “developments of more than three houses shall only take place on allocated sites”? It could unnecessarily restrict windfalls (note that at least one windfall site in Peasmarsh in the past 10 years was for 4 dwellings – which is included in the 16 windfall dwellings counted on pg.45).</p>	<p>The reason for limiting the size of windfall sites is to ensure that developers do not by-pass the intent of the Plan and try to develop on unallocated sites.</p> <p>Review the wording of the policy.</p>
<p>Policy S3 : Development Boundary</p>	
<p>Rother DC :</p> <p>The second sentence implies that the Parish Council is the decision-maker, however this is the role of RDC as the Planning Authority. We recommend deleting this sentence.</p>	<p>As was explained at the meeting on Dec 2 2022, the wording came about because in 2019 RDC unilaterally changed the boundary without any reference to PPC.</p> <p>Review wording to clarify.</p>
<p>PM01 : Flackley Ash</p>	
<p>Rother DC :</p> <p>The site is not as well related to services as other sites and has to date been considered as an unsustainable location. Access is off a narrow lane with no footways, although it is only a short distance to the A265, which does have a continuous footway back to Peasmarsh on the opposite side of the road. As a minimum, pedestrian crossing facilities need to be provided on the A265 and footways improved, but even with these improvements the site is some distance from most services in the village (e.g. 1.2km from the school) meaning residents would be largely car-reliant. This is of particular concern, given that the site is proposed for wholly affordable housing.</p> <p>Furthermore, development of the site would harm the rural character of the location (particularly if works are required to the narrow lane to facilitate access) and would appear to result in the loss of many trees currently within the site, although a recent site visit highlighted that many of the trees are ornamental and could be replaced with native species subject to an arboricultural survey. Development could also harm the setting of the nearby listed buildings.</p>	<p>Mackerel Hill is not a particularly narrow lane, given the width of the A268. Agreed absolutely that a crossing would be required at the junction with the A268.</p> <p>The particular site is unlikely to appeal to younger families but would be attractive to older people wanting to downsize [as discussed in Section 6]. The school and the recreation ground would therefore be irrelevant.</p> <p>The setting of the listed buildings would not be significantly affected by development and those buildings that would be influenced are not truly deserving of their listed status.</p> <p>Review wording accordingly.</p>
<p>East Susses CC :</p> <p>The speed limit on Mackerel Hill is derestricted (60mph) and actual vehicle speeds are unknown. The position of access point for</p>	<p>The built-up section of Mackerel Hill – the last 250 metres – should be restricted.</p>



Consultation Statement

<p>vehicles would depend on a 7-day speed survey to determine the appropriate driver sightlines required. Access on foot is a constraint due to the absence of footways or crossing point to reach the A268 footway network. Jempson's is 700m distant and within walkable distance but primary school and pre-school are 2km away which would likely be out of walking range for younger children. Mill Lane bus stops are within a very short walk but infrastructure is required to support connections to the bus stops</p>	<p>See response above re : distance from school.</p> <p>Also see above response re : crossing on the A268.</p> <p>Review wording accordingly.</p>
<p>Peter Mackay and Vanessa Smith :</p> <p>The Flackley Ash site is designated as a “rural exception” site, for accommodating households who are current residents or have existing family or employment connection.</p> <p>Should the proposed development go ahead, how would the criteria for ownership be protected by the developer or the PNDP? Who would oversee this and what recourse would there be to ensure the “rural exception” nature of the site?</p> <p>What evidence is there for this type of housing among this constituency?</p>	<p>As was explained at the meeting in November 2021 by the representative of Icklesham PC, the requirements would be enshrined in the planning approval [e.g. through the development of a local Community Land Trust] See Policy H2</p> <p>The independently commissioned Housing Needs Assessment gives a breakdown of local needs. As explained in Section 10.1, one of the first steps in taking the Plan forward will be getting a <u>detailed</u> housing needs assessment undertaken by an organisation such as Action in Rural Sussex</p> <p>In addition, through the public consultations, local businesses (retail, tourism and care) have highlighted the issue of local housing being unaffordable for their workers and thus is a risk factor to their businesses.</p> <p>No action required.</p>
<p>Peter Mackay and Vanessa Smith :</p> <p>The Flackley Ash site is not within the RDC preferred area.</p>	<p>What it says in the RDC Rural Settlements Study is :</p> <p><i>The area around the supermarket and post office is in effect a service centre of the village, despite being outside the current Local Plan development boundary. It would seem sensible therefore that any new development should aim to facilitate access to, and usage of, these local facilities.</i></p> <p>No action required.</p>
<p>Peter Mackay and Vanessa Smith :</p> <p>None of the houses in the Flackley Ash hamlet is connected to the main sewage system</p>	<p>Firstly, one of the objectives of the Plan is to have all of the village on mains sewer [policy I4 : I2 in the Regulation 15 edition]</p>



Consultation Statement

<p>relying on individual systems (such as septic tanks, digesters etc).</p> <p>Any development would require similar individual facilities that are expensive to install. In addition, your development proposal makes no mention, nor does it consider the provision, of providing an improved infrastructure for the established housing in Mackerel Lane, which would appear to ignore the first objective of achieving sustainable development (NPPF 8).</p> <p>The ongoing costs of such units require privately funded servicing and emptying on an annual basis, and those costs can be onerous. Such additional financial burdens could detract from the social objective to provide a range of homes to meet the existing community needs and tenure of houses needed for different groups in the community, without attracting the more affluent, or second home owners (NPPF 8).</p>	<p>Secondly, if a developer chooses to develop the site before that is achieved then it would be a single digester system not individual systems and clearly an option would be to have a system suitable for adjoining properties to share that.</p> <p>The Plan follows NPPF guidelines, including NPPF 8. This comment applies to all sites within the Plan and is not specific to Flackley Ash.</p> <p>No action required.</p>
<p>Peter Mackay and Vanessa Smith :</p> <p>Access to the development site would have to be via Mackerel Hill, which is a narrow country lane, used by farm traffic and a few houses, with an extremely narrow entrance to and from Mackerel Hill onto the A268. The surrounding area is actively farmed and busy with large farm vehicles.</p> <p>Given the number of houses envisaged by your recommendation, traffic (by private cars, and accompanying delivery and servicing vehicles etc) would inevitably more than double traffic on a country lane unsuitable for that amount of usage (and has been deemed so by previous Council refusal to planning applications). This issue would continue to require comment and approval by the ESCC Highways authority and National Highways.</p> <p>There is no pavement for pedestrians, which makes it hazardous to walk along Mackerel Hill to get to the main road (to Jempson's/bus stop/post box etc) and not least the village core, including the school and other facilities.</p> <p>Thus, the siting of such a development on Mackerel Hill necessarily implies a dependence upon the car for the use of village amenities (church/hall/pubs/school) and does little to address recommendations (NPPF 2) of moving to a low-carbon environment. It also highlights the poor transport infrastructure in</p>	<p>Accepted</p> <p>The site is close to the junction of Mackerel Hill with the A268 and pedestrian access would be part of any formal planning application</p> <p>In a linear village such as Peasmarsh there are always services at a distance to any particular site. RDC considers the Jempson's campus to be the service centre for the village which is at the western end of the village.</p> <p>Review wording accordingly.</p>



Consultation Statement

<p>Peasmarsh village and one that is greatly increased at Flackley Ash, being well outside of the village core.</p>	
<p>Peter Mackay and Vanessa Smith :</p> <p>The final draft proposes 10 houses to be developed on the Flackley Ash site, which is different from the previous plan of 3 houses. No substantive reason is given for this increase.</p> <p>Such an increase in houses would develop the area from the existing 6 houses to 16 houses, an increase in a rural area, with an already poor infrastructure, of 166%.</p> <p>This would appear to be a heavy overloading.</p> <p>The NPPF (64) states “Provision of affordable housing should not be sought for residential developments that are not major development, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer).</p>	<p>Disagree : the consultants’ SOA suggests ‘<i>Approximately 3-5</i>’ dwellings without any justification. The PSA calculates that the 0.8 ha site can accept up to 10 dwellings using a conservative 50% site-specific factor for mitigation and allowing 20% of the reduced site area for roads, open spaces and similar.</p> <p>There are 29 houses [considered by some to be a hamlet] within 250 metres of the junction of Mackerel Hill and the A268. That would be an increase of 25% which would help the argument for the houses to have access to main sewage.</p> <p>NPF is quoted out of context as major development is not permitted in AONB’s [NPPF 177].</p> <p>No action required.</p>
<p>Peter Mackay and Vanessa Smith :</p> <p>Can it be guaranteed that any new development would not require outside lighting at night?</p>	<p>This is dealt with by policy D5.</p> <p>No action required.</p>
<p>Peter Mackay and Vanessa Smith :</p> <p>A development of 10 dwellings would also have a detrimental and disruptive effect on the biodiversity and habitat of the wealth of wildlife and protected species of the area by the increased movement, noise, lighting and chemical pollution.</p>	<p>This is dealt with by policies L2, L3 and L4 [in the Regulation 15 draft Plan – new numbering]</p> <p>No action required.</p>
<p>Peter Mackay and Vanessa Smith :</p> <p>The Flackley Ash Hotel is described in the PNDR Report as being in a “totally rural setting”. The proposed site is deemed medium to high visual and character sensitivity with low capacity to accept change through development.</p> <p>The suggested 10-dwelling development would change the character of the Flackley Ash hamlet and be contrary to government recommendations (in NPPF 2021) and more recently supported by the Government’s decision making the housing policy “advisory”.</p> <p>Flackley Ash Hotel and the Grade II listed cottage that both abut the proposed site would</p>	<p>Significant modern expansion of the hotel adjoining the original Georgian mansion has been allowed since the original listing in 1961.</p> <p>The site is well screened by trees and any development proposals would be expected to retain this screening both for visual aspects and to retain green corridors</p> <p>No action required.</p>



Consultation Statement

<p>be greatly affected and it is hard to understand how their architectural heritage is being protected.</p>	
<p>Peter Mackay and Vanessa Smith :</p> <p>Comments have previously been outlined about the protection of our countryside and wildlife, as has the necessity of the site to force people to use their car.</p> <p>The proposed development, being outside the identified development area and also the preferred area identified by RDC, does not address nor support any measures to mitigate climate change and adaption (NPPF Strategic Policies).</p> <p>The NPPF identifies the existing trees as “significant” rather than ancient or veteran but no expert report is available to support such an assessment.</p> <p>The trees that are present are home to many birds and other wildlife species and therefore are a “significant” habitat.</p>	<p>The Plan recognises the specific environmental needs highlighted by the AONB designation : see Section 3 and its policies.</p> <p>No action required.</p>
<p>Peter Mackay and Vanessa Smith :</p> <p>The telecommunications at Flackley Ash is extremely poor, making mobile phones frequently redundant. Likewise, the electricity supply is subject to intermittent outages, adding to telecommunication problems.</p> <p>As there is no main gas supply, as an alternative energy source, the day to day living of residents is frequently disrupted.</p> <p>There is no consideration in the PNDP of any provision being made or considered for network updates in the Flackley Ash area to support the proposed increased housing development.</p> <p>The PNDP report refutes any overhead powerlines on the proposed site as being an ‘optical illusion’. However, a cursory inspection appears to indicate two overhead power lines to be present, either within or next to the proposed site.</p>	<p>Other than gas, these are issues which affect the whole parish and the Plan seeks to improve the situation for all parts of it : see Section 4 and its policies.</p> <p>A powerline runs close to the designated site. The other overhead line is a telephone line which can be easily diverted</p> <p>No action required.</p>
<p>Peter Mackay and Vanessa Smith :</p> <p>The existing Peasmarsh community facilities are sited in the village core, where residents can walk or cycle to them. The Flackley Ash site offers no such existing provision whatsoever and no areas that could</p>	<p>RDC has recognised the Jempson’s campus as the service centre of the village. The linear nature of the village means there is no recognisable centre to the village and facilities are not grouped together</p>



Consultation Statement

<p>accommodate new community provision (NPPF – Strategic Policies). Thus the site, being well away from the existing community facilities and services, risks becoming a 'satellite' area to the village core.</p>	<p>No action required.</p>
<p>Peter Mackay and Vanessa Smith :</p> <p>There seems to be some inconsistency of approach if these factors are not similarly considered in respect of the Flackley Ash site.</p> <p>For example :</p> <p>Oaklands has vehicular access difficulties as does the Flackley Ash</p> <p>Oaklands has difficult cycle and pedestrian access as does the Flackley Ash</p> <p>Oaklands has adjacent ancient or veteran trees as does the Flackley Ash</p> <p>Oaklands is adjacent to a listed building, Flackley Ash has two</p> <p><i>Many other examples put forward</i></p>	<p>The inconsistency seems to be in relying on the SOA which was superseded by the PSA</p> <p>For example :</p> <p>Oaklands has <u>no</u> vehicular access, Flackley Ash does</p> <p>Oaklands has no such issues, Flackley Ash needs a crossing on the A268 to benefit all</p> <p>Neither site has ancient or veteran trees</p> <p>It is the setting of listed buildings which is important.</p> <p>It is important to note that Oaklands has not been excluded, indeed it is nominated as a site in the Plan – if needed because another site does not ultimately evolve to development – provided that the lack of access can be solved.</p> <p>Each site was assessed on its own merits without inconsistency. The differences are not necessarily comparable. For instance, a site might be in a sensitive zone but be, itself, not so sensitive because of its own setting.</p> <p>Review wording and adjust as needed.</p>
<p>PM02 : Woodside</p>	
<p>Rother DC :</p> <p>While this is better related to some services than PM01, it remains at the far western end of the village. A new access and development here would change the rural character of this edge of the village location, breaking through a significant tree line and necessitating the removal of a number of mature trees. Access on to the main road, which currently has a speed limit of 40mph, is a major consideration for this site.</p>	<p>Yes, the site is at the far west end of the main part of the village but so too is the Jempson's campus, the commercial hub of the parish.</p> <p>The RDC Rural Settlements Study states :</p> <p><i>The area around the supermarket and post office is in effect a service centre of the village, despite being outside the current Local Plan development boundary. It would seem sensible therefore that any new development should aim to facilitate access to, and usage of, these local facilities.</i></p> <p>To describe the immediate area as having a rural character is disingenuous, the junction of Tanhouse Lane with the A268 [and logical</p>



Consultation Statement

<p>There could also be an adverse effect on the setting of adjacent listed buildings.</p>	<p>location for site access] being immediately next to Jempson's and Tanhouse Yard and subject to continuous traffic – much of it heavy vehicles.</p> <p>The site is sufficiently secluded and remote to have no significant effect on the listed heritage assets.</p> <p>Review wording and adjust as needed.</p>
<p>Southern W :</p> <p>Our information indicates that the sewer main on Main Street is 80 metres from the 'Woodside' address point and just 10 metres from the southern edge of the PM02 development boundary.</p>	<p>SW's official map shows that the sewer stops at the top of Cock Hill, not at the bottom. The last chamber is 5901.</p> <p>If the sewer does extend as described why is it not shown on the map and where is the WWPS/FPS because there is a ~10m drop between the top and bottom of Main Street?</p> <p>Review wording and adjust as needed.</p>
<p>East Sussex :</p> <p>This site is on the north side of the A268 where there are no footways. Although it is close to village services, any vehicular access would need to meet the safety requirements for a 40mph road (120m driver sightlines) and be in a position that does not conflict with movements in and out of Tanhouse Lane. A means for pedestrians to connect safely to the existing footway network would be essential to reach neighbourhood services and to public transport provision. Existing bus stops are in excess of 400m from the site and additional provision is likely to be sought. Ideally, any new bus stops would serve Jempsons also (noted that there are no bus stops there) and may require conjoined working with the Jempson's landowner to support sustainable travel in the vicinity of this site for northwest and southeast bound stops.</p>	<p>Agreed.</p> <p>The Tanhouse Lane junction is already a major issue. The logical solution is to have a roundabout or traffic lights there which would also serve as the access to the site and help encourage drivers to keep to the speed limit.</p> <p>Review wording and adjust as needed.</p>
<p>PM04 : Orchard Way</p>	
<p>Rother DC :</p> <p>A small residential development could potentially be accommodated, subject to the Highway Authority's acceptance of the access road and subject to careful design to protect the amenity of the adjoining dwellings.</p>	<p>Thank you</p> <p>No action required.</p>
<p>East Sussex CC :</p> <p>This site is served from the 30mph section of Main Street. The access road is single track</p>	<p>Thank you for clarifying the requirements.</p>



Consultation Statement

<p>and already serves a number of dwellings (4 from a desktop study). The access width with Main Street is required to be 5m wide minimum to allow entry and egress safely, and to prevent unnecessary waiting in Main Street. For additional dwellings, a refuse truck will require to enter, turn and exit and any proposal would need to accommodate this. A crossing point for pedestrians would be a requirement to allow access to nearby primary school and Horse & Cart PH.</p>	<p>No action required.</p>
<p>PEAL01 : Cornerways</p>	
<p>Rother DC :</p> <p>This is an exposed and elevated site which has a strong rural character, development here would have an urbanising impact and be harmful to the AONB, contrary to paragraph 176 of the NPPF.</p> <p>Access would appear problematic, being via a narrow rural lane, which slopes steeply to the east. The NP states that the sewerage connection does not extend all the way along School Lane, if this is the case then would this be an issue for further housing? We are aware that the PNP Policy I4: Sewage System Improvement intends to ensure waste infrastructure is in place before development progresses.</p>	<p>Disagree that the character is strongly rural. There is good mitigation opportunity by extending the existing tree belt which is at the end of some of the gardens on School Lane.</p> <p>Agreed with respect to access [see below] and hence the wording in the Plan. The sewage issue is less serious at this site than at the others, the sewer stopping 110 metres lower down the hill.</p> <p>Review wording and adjust as needed.</p>
<p>East Sussex CC :</p> <p>This site is located in a corner plot of land on the south side of School Lane where the speed limit is 30mph. There are no footways and School Lane has irregular carriageway widths, being quite narrow in sections. The alignment of the road restricts driver visibility both in a forwards direction and would pose a challenge to seeking a suitable access provision to serve the site.</p> <p>As a starting point it is recommended that speed surveys are carried out to ascertain the actual speeds so the driver sightline distances can be recommended as it is likely that speeds do not exceed 30mph given the highway conditions. There may be a requirement to remove some boundary vegetation to accommodate sightlines for both vehicular and non-motorised accessibility.</p> <p>There is a PRow (17/18b/c) opposite the site that provides a traffic free route to Main Street</p>	<p>Agreed</p> <p>Traffic surveys will be the responsibility of a developer in due course.</p> <p>Agreed</p> <p>Review wording and adjust as needed.</p>



Consultation Statement

<p>and directly to Jempson's. Not knowing the surface of this, scope to improve the surface should be explored to improve connectivity for active travel potential.</p>	
<p>Mel Goodsell :</p> <p>This site was not assessed by the consultants. I was pleased that this fact was mentioned in the plan, but didn't understand why, therefore, it had been seen as an acceptable site.</p>	<p>Not only is that detail mentioned but the Plan states that development could not occur without an assessment undertaken by an external consultant.</p> <p>Strengthen the wording with respect to an external consultant assessment..</p>
<p>Policy S2 and PEAL01 Cornerways</p>	
<p>Multiple Respondents :</p> <p>The site was submitted 8 weeks ago and not given the same consideration as other sites</p>	<p>The site, together with a second site, was submitted to RDC Housing and Economic Land Available Assessment [HELAA] by the landowner in spring 2022, The PNDP steering group was informed of this by RDC in early May.</p> <p>The inclusion of these additional sites to the HELAA was notified to parishioners at the Annual Parish Assembly on May 18.</p> <p>The NDP presentation from that meeting was uploaded to the website towards the end of the month and publicised on Facebook. Having just missed the deadline for May, it was included in the June Peasmarsh Periodical.</p> <p>The site was assessed by the PNDP group using the AECOM process.</p> <p>It was not reviewed by the external consultants which is why the Plan calls for a consultant such as AECOM to verify its suitability should a developer wish to build there [Plan Section 7.7].</p> <p>No action needed.</p>
<p>Multiple Respondents :</p> <p>Cornerways is a P3 site with less scope to accept change than Tanyard which is a P1 site.</p>	<p>Both sites are in zone P3 of the 2009 Landscape Assessment. If anything, Cornerways is more marginal as the land on the other side of of School Lane is in Zone P2 which is more able to accept change.</p> <p>Consider including the map from the Landscape Assessments in 7.2 Background.</p>
<p>Multiple Respondents :</p>	



Consultation Statement

<p>Cornerways impacts on a non-designated historic asset, there is a veteran tree within the site, it is close to ancient woodland and impacts two PRowWs including the HWLT.</p>	<p>These issues all have to be mitigated under the terms of the Plan, particularly Policies DI and D2 and their associated Design Codes 3.2 and 3.2 respectively.</p> <p>It should also be noted that AECOM, in the Strategic Environmental Assessment concludes that, <u>before consideration of mitigation</u>, the Plan is <i>considered likely to lead to minor negative effects, ... effects are likely to be negligible.</i></p> <p>Consider applying for a TPO on the tree.</p>
<p>Multiple Respondents : The assessment claims that the site is next to and connected to a built up area when there are only 3 properties close by.</p>	<p>The statement in the Plan is correct : the site is contiguous with the development boundary.</p> <p>No action needed.</p>
<p>Multiple Respondents : It is not accurate to say that RDC's preferred area for development is to the west of the village.</p>	<p>It is accurate to state that. What Section 7.2 of the Plan says is :</p> <p><i>This is especially true of those sites to the west of the village, Rother's preferred area for development as set out in its 2006 Rural Settlements Study.</i></p> <p>That study states :</p> <p><i>Although its ancient origins were centred upon the church to the south, the focus of the village today has partly shifted north and west. The area around the supermarket and post office is in effect a service centre of the village, despite being outside the current Local Plan development boundary. <u>It would seem sensible therefore that any new development should aim to facilitate access to, and usage of, these local facilities.</u> [emphasis added]</i></p> <p>No action needed.</p>
<p>Multiple Respondents : What is clear is that RDC want "larger sites".</p>	<p>That may be the case but :</p> <ul style="list-style-type: none"> i) that is not what the stakeholders want [see the several references in the Plan] ii) that is not what NPPF 176 / 177 require <p>No action needed.</p>
<p>Multiple Respondents : School Lane is already a busy road with severe traffic issues, speeding concerns and restricted access for larger / emergency</p>	<p>The Plan recognises [<i>inter alia</i>, policies L6 and I1] the issues on School Lane, including the</p>



Consultation Statement

<p>service vehicles. It cannot withstand an increase in traffic. There is no footpath [at the top of the lane]</p>	<p>need for a pavement along the length of the built-up area.</p> <p>There are 67 properties that have access from School Lane [not counting Bushey or the derelict property opposite the site]</p> <p>No action needed.</p>
<p>Multiple Respondents :</p> <p>The site is on a blind bend which has resulted in numerous car accidents.</p>	<p>Agreed but the PNDP group does not have the competence or, indeed, the data which would be required to judge the issue of visibility. That is why the Plan [Section 7.5.5] states :</p> <p><i>The site is considered suitable for development with 7 dwellings provided that access is acceptable to the highway authority.</i></p> <p>No action needed.</p>
<p>Multiple Respondents :</p> <p>The site is in an SSSI impact risk zone.</p>	<p>Whilst true, this applies to much of the parish and the level of impact is low, not requiring that Natural England be consulted.</p> <p>Consider clarifying this in the Plan.</p>
<p>Multiple Respondents :</p> <p>The site is assessed as P1.</p>	<p>Not correct, it is in zone P3 – see earlier comment.</p> <p>No action needed.</p>
<p>Multiple Respondents :</p> <p>Paragraph 11.175 of RDC's NDP states : <i>follows existing residential curtilages to prevent inappropriate backland development from encroaching into the countryside and harming the rural setting of the village</i></p> <p>The site is within the boundary and any development would be contrary to para 11.175</p>	<p>This refers to para 11.175 of the 2019 DaSA which describes the 2019 boundary, it is not policy.</p> <p>It should be noted that the site is <u>not</u> currently within the boundary but that could be a typographic error by the respondents with a missing 'not' [see next statement].</p> <p>What is key is that the boundary is not fixed in perpetuity and has changed a number of times to incorporate new development [Plan Section 7.6]. In fact the bounded area was substantially increased by the 2019 DaSA in order to be able to allocate the 'Pippins' site.</p> <p>Consider showing the map of the 2019 change to the boundary in the Plan.</p>
<p>Multiple Respondents :</p> <p>The site is outside the existing development boundary which would mean extending the boundary contrary to RDC's own planned</p>	<p>See above response.</p>



Consultation Statement

<p>boundary. Tanyard fell within the boundary but was rejected.</p>	<p>It is not correct to say that Tanyard fell within the boundary : it is outside the boundary.</p> <p>No action needed.</p>
<p>Multiple Respondents :</p> <p>There is no provision for sewage at the top of School Lane.</p>	<p>Correct : sewage is a problem throughout the parish. That is covered by policy I4 [now I2] which requires the system within the village to be suitable before any development occurs.</p> <p>No action needed.</p>
<p>Multiple Respondents :</p> <p>Run off drainage would be increased by development putting properties further down School Lane at risk.</p>	<p>The Plan extends the national requirement for a SuDS system [applicable to major developments] to cover all development within the parish, no matter what size [Policy I5 – now I3 – and associated Design Code 3.3.</p> <p>No action needed.</p>
<p>Multiple Respondents :</p> <p>The Plan requires developments to be no more than supplying 10 properties. According to the formula Cornerways could take 10. By contrast there was nothing suggesting that Tanyard wasn't suitable to have a smaller development of 10 houses rather than the maximum 40 plus suggested.</p>	<p>The calculation in the PSA is correct : the exact figure for a 0.38 ha site with a landscape factor of 70% and a 10% deduction for infrastructure is 7.182 with a density of 30 dwellings per hectare.</p> <p>It is not clear where the respondents got a figure of 40 plus dwellings for Tanyard, the SOA proposes 20 dwellings. The Plan does not suggest any number of dwellings because the site was ruled unsuitable for other reasons.</p> <p>No action needed.</p>
<p>PEA01 : Oaklands</p>	
<p>East Sussex CC :</p> <p>The proposal at Pippins (adjacent to this site) for 29 dwellings was accepted by the Highway Authority, though it is understood that the planning application has been subsequently withdrawn. If Pippins came forward again, this site could have a vehicular connection through and utilise the access provision that was supported onto the A268 at the position of Pippins. It is not clear from the sites plan map 7.1 where the access is anticipated to be otherwise to provide any meaningful comments.</p>	<p>Pippins is proposed to be 45 dwellings not 29 and access would have to be along approximately 40 metres of narrow shared surface which is less than 5 metres in width. To add another 10 dwellings worth of traffic would make the access even more dangerous.</p> <p>No action needed.</p>
<p>PEAL01 : Old Football Ground</p>	
<p>East Sussex CC :</p>	



Consultation Statement

<p>See comments for Oaklands. Though it is noted that land ownership extends to Tanhouse Lane where there may be scope to access the site, though requiring some Jempson’s land (southern corner adjacent to the footpath 18b), and some minor widening at Tanhouse Lane to incorporate suitable carriageway and footway for access.</p>	<p>The consultants that undertook the SOA are adamant that the adjacent land assessed could not be used to provide access to this site and the contiguous Oaklands site.</p> <p>Consider including this in the Plan.</p>
<p>Section 7.8 Conclusions</p>	
<p>Rother DC :</p> <p>It is incorrect to include windfalls in the total of what the Plan delivers, the Plan doesn’t deliver windfalls, windfalls happen regardless, however the estimate for 20 dwellings to come forward as windfalls is probably reasonable.</p>	<p>The intent was to derive a likely total number of homes and should not have used the word ‘delivers’.</p> <p>Review wording to clarify.</p>

4.8 Section 8 : Design and the Built Environment

There was no substantial change as a result of the internal review, just a slight change to emphasise sustainability.

Feedback was received from RDC and ESCC :

Issues / Concerns Raised	Steering Group Response / Action
<p>Section 8.1 : Introduction</p>	
<p>East Sussex CC :</p> <p>Refer to the health and wellbeing benefits [physical and mental] of good neighbourhood design.</p> <p>Objectives should include measures to reduce social isolation, support healthy lifestyles and improve social cohesion by providing places for people to meet. [Perhaps cross reference to policy L2 - Locally Significant Views’ and consider having seating at such places]</p>	<p>Accepted</p> <p>Consider changing wording providing the balance of the Plan is not upset.</p>
<p>Policy D1 : Existing Setting</p>	
<p>Rother DC :</p> <p>We recommend that the heading is changed to ‘Local Setting’</p> <p>NPPF states that Plans must be positively prepared. Recommend that you amend second sentence to <i>‘Developments that have regard to the following will be supported’</i></p> <p>Delete first sentence of criterion ii).</p>	<p>Accepted [needs the same change in Design Codes]</p> <p>Reword heading</p> <p>Change to positive wording</p> <p>Rewrite first sentence in a positive way</p>
<p>Policy D2 : Placemaking</p>	



Consultation Statement

Rother DC : See comment in D3	See below
Section 8.4.3 and Policy D3 : New Homes	
Rother DC : This policy does not differ to D2. If the policy intent is addressed in the Design Code, as all homes in the Plan are essentially 'new' development, we recommend combining D2 and D3 into one policy that aims to influence placemaking.	The intent is distinctly different : D2 [and Design Code 3.3] is all about the environs of the development and D3 [and Design Code 3.4] is about the individual buildings on the development. Change the words to clarify
East Sussex CC : Due to the older and aging population, reference should also be included to design guidance for dementia such as that of the Royal Town Planning Institute [see the East Sussex dementia needs assessment].	Accepted Review introductory wording : Bexhill and Battle constituency is an Alzheimer's hotspot.
Policy D4 : Energy Efficiency and Sustainability	
Rother DC : We support this policy and recommend that the various points are numbered for clarity. Regarding the last paragraph and criterion (i), is there AONB guidance for small-scale renewables?	Accepted Insert numbers Yes. There is a July 2021 advice note 'Legislation and Planning Policy in the High Weald AONB' which includes a template for assessing development proposals against the HWMP. With respect to Objective G3 [To help secure climatic conditions and rates of change ...] it does suggest that proposals be judged as to whether they include <i>landscape-sensitive, small scale renewable energy generation</i> .
Policy D5 : Dark Skies	
Rother DC : We recommend that you define 'essential purpose'.	Accepted Change words accordingly

4.9 Section 9 : Implementation and Monitoring

There was no substantial change as a result of the internal review and no feedback was received.

4.10 Section 10 : Community Aspirations

Most of the changes made in Section 10 are the result of feedback in other sections.



Consultation Statement

Feedback was received from a stakeholder :

Issues / Concerns Raised	Steering Group Response / Action
General	
<p>Mrs S. Cavilla :</p> <p>People are moved into the village from other areas and very few take part in village life. We have more social housing already - double the number in the rest of Rother.</p> <p>Please be aware that Optivo has consistently failed over a number of years to address ongoing problems in School Lane despite letters and emails from many people with photographic evidence. No meaningful response has ever been received or action taken.</p> <p>Also when involved in new building such as the one at the Maltings, the original residents were not rehoused in the new development - the open green area was built on - a large car park put in- and a 3 storey development put up (the only 3 storey development in Peasmarsh) This had the result of dominating other residents and caused water problems so after heavy rainfall Hop Gardens (lower down) had their gardens flooded</p> <p>I am also concerned about the lack of resources for young people in the village because Brownies, Guides, the Youth Club and the Sunday School have all ceased to exist during the time I have lived here.</p>	<p>Thank you for your support</p>

Appendix 4 : Infrastructure Analysis

Some of the changes made in this appendix are the result of the internal review, in particular an update to the subsection on public transport as yet another of the bus services has been withdrawn and further commentary to the foul water disposal subsection as a result of further investigation.

Feedback was received from SW :

Issues / Concerns Raised	Steering Group Response / Action
Utilities; Foul Water Disposal Subsection	
<p>Southern W :</p> <p>Change first two paragraphs :</p> <p>Attempts by the PNDP steering group to obtain information on the foul water system from Southern Water [SW] have had only limited</p>	<p>Disagree.</p> <p>In an email of Jul 21 2022 SW stated :</p>



Consultation Statement

<p>success, with information being provided grudgingly and without detailed evidence.</p> <p>In essence its view <u>conclusion from several reviews of available data for Peasmarsh is</u> seems to be that there are no significant problems with sewer capacity and any flooding incidents are the results of self inflicted failures of care by their customers. This runs counter to the lived experience of the residents of the village, particularly those unfortunate enough to live in locations <u>experiencing issues,</u> <u>although we acknowledge the Parish was unable to identify details</u> of these locations and issues to allow Southern Water to investigate further. prone to foul water flooding</p>	<p><i>As regards your attached meeting note, I'd firstly just mention that I confirmed (with agreement from everyone present at the end of our meeting) that we'd fulfilled the agenda for the meeting, and then also confirmed the actions we'd jointly agreed from our discussion.</i></p> <p>That comes across as SW saying it has done all it is going to do : don't bother it again.</p> <p>The question of sewer capacity has been further developed in the Regulation 15 draft of the Appendix.</p>
<p>Southern W :</p> <p>Change the caption to the second pair of images :</p> <p>Frame grabs from cell phone videos of two separate incidents. On the left overflows from sewage is erupting from close to an inspection chamber. On the right flows sewage is gushing out with some considerable force from <u>what appears to be a sewer line (public or private) the underground sewage main.</u> No dates or details could be provided to allow Southern Water to investigate any history that might relate to these images.</p>	<p>Disagree.</p> <p>Both videos were viewed during the videoconference of June 9 2022 when it was explained by the PNDP group that the location was at the end of The Old Hop Garden where several public sewers – both foul and surface water – pass through the garden just 125 metres from the pumping station and that the events had been recorded on Apr 8 2022.</p> <p>No action required.</p>
<p>Southern W :</p> <p>Change paragraph 4 :</p> <p>As is discussed in Section 4.3.5 of the Plan, the key concerns raised by the Parish issues are :</p> <p>The limited nature of the network so that only part of the village has access to the sewage system;</p> <p>The inability of the system to cope with surface water even though SW accepts that the older properties in the village may have combined systems</p> <p>Please remove the next sentence of this section as where the property drain to the in-street sewer is free flowing then there is no block on the public network that could be affecting that property. In such instances customers should make contact with a plumber or equivalent service to investigate the issues</p>	<p>Disagree : if a drain CCTV company finds that the private drain is not blocked then the back-pressure must be coming from the public sewer.</p> <p>No action required.</p>



Consultation Statement

<p>on their private home plumbing and drainage pipework.</p> <p>Anecdotally, people talk of foul water backing up in their toilets — even though their drain to the in-street sewer is free flowing — and explosive events coating toilet walls with excrement.</p>	
<p>Southern W :</p> <p>Please remove the following passage of this section as it does not relate to sewage capacity, is not derived from a study of data for the catchment, and is presented out of context from explanations we have provided on the sewage network and broader responsibilities for surface water drainage.</p> <p>There have also been informal ‘chats’ with SW workers when at the pumping station. It is reported that, in their view, there is no spare capacity at the station.</p>	<p>Disagree : these are the people who have real experience of the issues at the pumping station.</p> <p>No action required.</p>
<p>Southern W :</p> <p>Change the seventh paragraph :</p> <p><u>Risk based catchment screening is a process completed at the outset of developing a Drainage and Wastewater Management Plan (DWMP). It's used to identify which sewer catchments are likely to be most vulnerable to future changes, such as climate change or new development, so effort can be focused accordingly.</u> When SW undertook a Baseline Risk and Vulnerability Assessment for the Iden wastewater treatment works in 2020, five risk criteria were found to be ‘very significant’ : pollution risk, storm overflow risk [2020 and still in 2050] and nutrient neutrality [2020 and still in 2050]. This confirms that <u>the relative significance of the risks performance of the Iden wastewater system to allow comparison with others in the Rother catchment, is potentially below the minimum threshold but there is no mention of remedial investment in SW's long term plan. Investment needs are detailed for the catchments prioritised to have the most significant risks.</u></p> <p>It is worth noting that the water industry is normally regulated by 5 year investment programmes, <u>in addition to developer connection fees that contribute to the cost of network growth schemes where these are required.</u> As a result, the timing of future housing development may be impacted by the</p>	<p>Disagree : SW seem to imply that investment is deliberately limited. There is no higher level of risk than ‘very significant’ so how can priority be given to other areas?</p>



Consultation Statement

financing of any sewage system upgrades as required.	
---	--

Peasmarsh Site Assessments

Feedback was received from SW :

Issues / Concerns Raised	Steering Group Response / Action
Utilities; Foul Water Disposal Subsection	
Southern W : Change paragraph 6 : Inadequate drainage sewage system	Disagree : the original paragraph states : <i>The spring line, surface water run off issues – already a problem at the eastern end of the village – and inadequate sewage system – which leads to regular foul water flooding in the immediate area – are issues that could prove difficult to mitigate.</i> That is correct. No change required.

Peasmarsh Villagescape and Design Code

Feedback was received from RDC :

Issues / Concerns Raised	Steering Group Response / Action
Rother DC : It is encouraging to see the number of photos illustrating the Code which enable the reader/decision-maker to better understand the context of the PNP. There are many character areas, however these are clearly identified in a map setting out the location of each. Whilst the introduction to the document has value and the individual character areas are well described, we recommend locating Section 3: Design Codes at the beginning of the document for ease of use in decision-making. We are pleased to see that the High Weald Housing Design Guide has been referenced throughout the document.	The document has a natural structure which should not change. Ensure the final document has a hyperlink to the Design Codes on the contents page.



Consultation Statement

Strategic Environmental Assessment

Feedback was received from SW but the document belongs to AECOM and cannot be changed by PNDP.



Consultation Statement

Annexe CS1 : Notes of Utilities Meetings

Notes of meetings with :

ESCC Flood Management [*physical meeting*]

UKPN Ask the Expert [*virtual meeting*]

Southern Water [*virtual meeting*]

are on the following pages :



Consultation Statement

Notes of meeting with ESCC re flood and water management 01/03/22

ESCC Flood Management Team leader Nick Claxton

Peasmarsh NDP Members Keith Studer, Ben Morton

The meeting did not have a fixed agenda and ranged over our list of issues and covered the website and documents Nick was demonstrating. Our questioning focused on the type of surface water runoff and flooding found in Peasmarsh.

Who does what :

Nick's ESCC Flood Management Team (FM) was created after the Pitt report into flooding in 2007. It leads on flooding of all kinds for the council, including surface water flooding and flood risk. It has no statutory powers.

It is one of a number of players in this area including Environment Agency, Southern Water (SW), Local Authorities of various sizes, Drainage boards, Developers and Landowners. Also of relevance to Peasmarsh is the Highway Authority, which is responsible for the maintenance of culverts and watercourses underneath roads. For watercourses, ownership is normally split between the landowners on either bank, usually meeting in the middle. Nick noted that some information is not readily available and sometimes the team needs to consult historical records for evidence of old springs etc.

A guide to some of the organisations involved is on p7 of the ESCC Flood Risk Management Strategy [FRMS] document below which also has a guide to water ownership on p32.

<https://new.eastsussex.gov.uk/environment-planning/flooding/local-flood-risk-management-strategy>

The FM team :

The team is part of Planning and Environment Dept within the Communities, Economy and Planning Directorate. The team is small and is made smaller by having trouble recruiting 4 vacant posts. There is a national shortage of qualified staff.

It also produces and maintains the ESCC flood risk strategy and is currently working on a new update for this. It also investigates land drainage issues and investigates and records flooding occurrences over a certain size [unclear what the bar for this is]. It has the same flooding record map as PNDP currently holds.

It does not deal with sewage flooding – if this is sent to it it passes on to SW and steps back from involvement. It has no way of knowing if the SW mapping showing foul and surface water being separated in Peasmarsh is accurate or not. Where sewage does enter surface water flooding this is recorded but SW have to manage this. There is sewage information on the website, although he was unable to open this to demonstrate.

FM Planning role :

The FM team must be asked to comment on all planning applications of over 10+ dwellings about surface water management. If a development request is put in without prior consultation, planning will pass to it for comment. Developers often don't consult in advance even though it is in their interest to do so.



Consultation Statement

FM discusses how to resolve problems [this normally involves developers spending money] or if not satisfied it can raise objections to development plans. Ultimately planning decides and administers on developments.

The aim is always to ensure that water can drain away at the appropriate rate to avoid flooding. Water table depth is a significant factor in the efficiency of existing drainage – high water tables make development more challenging and expensive. The team expects all developments not to allow additional uncontrolled flows into existing watercourses. It also insists there must be no effect on existing drinking water aquifers.

It is involved in the Rother District Council plan and commented into this several months ago.

ESCC FM Websites:

The main website is here:

<https://new.eastsussex.gov.uk/environment/flooding>

Nick suggested PNDP looked at the following section in particular:

<https://new.eastsussex.gov.uk/environment/flooding/sustainable-drainage-systems#>

Open this frontpage on this section and go down to the pdf document on Water, People, Places for what is aiming to be achieved.

There is also a SuDS support tool which is a useful area within the ESCC website, and allows one to model any development, although it is built for flood management specialists!

<http://eastsussex.suds-tool.co.uk/>

To identify your area, you need to input map refs as Eastings and Northings, e.g. the road just outside the Horse and Cart is Easting 589096 Northing 122506. You can search for other refs using this website:

<https://gridreferencefinder.com/#gr=TQ8909622506|Point s A|1>

It is based on 9yr old data but it is working on a revamp of this. In the meantime it uses existing data to determine impacts of developments but add an additional 40% impact capacity to allow for global warming. When operated by Nick the site showed us various things including depth of water table [noticeably higher in certain areas of Peasmarsh], streams and watercourses.

If you can navigate round it, it helps show information held by it for any area within the ESCC area. This allows the team to determine the size of the holding capacity it expects on any development in order for water to drain away safely without flooding.

Future contacts

Nick Claxton was open and helpful throughout the discussion. He said PNDP can send further questions direct by email to his ESCC email address.

He mentioned Chris Flavin to whom Nick Claxton had forwarded the SEA Scoping doc from Mike. No commitments were made re contacting in either direction but Mike may want to contact further to see if there is anything else that might be wanted or find useful going forward.



Consultation Statement

Notes of meeting with UKPN re electricity power management 01/06/22

UKPN Ask the Expert support Mark Edwards (ME)

Peasmarsh NDP Members Keith Studer (KS), Ben Morton (BM), Mike Inkson (MI)

The meeting followed the agenda sent by Peasmarsh NDP and used as a basis for a wide-ranging discussion on power management issues

1) Introductions

Mark is the lead officer for PNDP within UKPN and will be the contact point when further information is required. He has worked with other parish NDP's and is familiar with the process involved. Keith and Ben are the lead on utility networks for the PNDP and Mike is the overall PNDP coordinator.

2) Current Supply Management

Mark - The UKPN process is driven and monitored by OFGEM regulations requiring records of minutes lost and customer service interruptions. It has formal plans for network resilience.

There is a higher number of outages in rural areas due to the difficulties and costs of maintaining a ring network in such places, meaning many customers are on one line T networks, which have a single point of failure.

Action Mark to send through a copy of the relevant supplier regulations.

3) Current Supply Technical

Mark - All faults in the area go to a planning team for recording and investigation. This feeds into an overall plan to improve and repair the village network.

UKPN also monitor load growth including areas such as EV's, Heat Pumps and the move from gas. This is part of a 5 yr plan for the technical infrastructure. Micro dropouts may be voltage failures for a number of reasons.

Mike - asked re new infrastructure for development.

Mark - builds of up to 10 houses are covered in the contingencies for the general plan, any larger builds must be paid for by the developers.

4) Records and Future supply

Mark - UKPN have an overall circuit map for the village which he demonstrated. Solid lines are underground cables, dotted lines overhead cables, green lines low voltage connections to a house. ABC = Aerial Bunch Conductor; circles are poles in place. Standard policy is like for like replacement of failures.

Mike - asked re new development costs.

Mark - Any upgrade needed to supply networks or to the substations would be costed by UKPN and paid for by the developer. Indicative costs are underground cable - £150 per metre, overhead £1500 per span.

There is no redundancy for rural networks on a spur line, normally around 1 megawatt per spur, 4/5 Kilowatts per house. 10 houses would be 50 Kilowatts, 100 houses 500 Kilowatts



Consultation Statement

PNDP - asked re copy of records and map.

Mark – map normally chargeable but will make copy available to us.

Action Mark to provide parish supply network map

Action Mark to provide record of downtime and connections for Peasmarsh, including reason for supply failures

5) Future Supply.

Mark- noted that for the next network period development costs would be paid for by all customers via a levy, rather than by the developers. This will take effect from April 1st 2023 and after this developers will not pay for substation upgrades but will pay for the new cables. This socialised charge is due to continue increasing.

6) Land Use.

Mark – Any changes need to discuss with UKPN about possible further developments. They are not in a position to put in large new links at present e.g., 1 Megawatt or above. There is a backlog of work – if a substantial new solar farm was planned for example, this could not be installed into the network until 2030. There is not currently enough space/network capacity/engineers within the UK to go fully green. It takes 10 years to agree a new nuclear station and 10-20 to build one.

7) Contact Details.

Mark – will be the contact for PNDP going forward if needed via Ask the Expert website. PNDP should place any queries there and they will come through to him.

8) AOB

No AOB. Further meetings to be arranged if required via the Ask the Expert website.



Consultation Statement

Notes of meeting with Southern Water re sewage system 09/06/22

Southern Water	Catherine Adamson - SW Strategic Planning Lead Kent + East Sussex; Charlotte Mayall - SW Strategic Planning Lead Hampshire, West Sussex, IOW; Leanne Grice - SW Field Performance Manager, Wastewater Collection
Peasmarsh NDP Members	Keith Studer, Ben Morton, Mike Inkson
Rother District Council	Julia Edwards, Craig Steenhof

The virtual meeting followed the agenda sent by Peasmarsh NDP – see annexe.

1) The Local Network

PNDP wished to obtain a broader understanding of the extent of the local network and which parts of the village were “off-grid”.

Access to Digdat should be available via RDC, although the mode of operation was unclear. SW acknowledged that since 2012 they had been under increased responsibilities.

It was acknowledged that foul and stormwater drainage were inevitably mixed in respect of developments preceding changes in Building Regulations. SW made it clear that they are not responsible for private networks.

Action SW undertook to provide links for access to Digdat. This was subsequently done in Catherine’s email of 9th June. Free access is available to Local Authorities.

Access to data is available free of charge to personal visitors at the SW Durrington Office, near Worthing. Otherwise, maps are available generally, at a cost, depending on requirement.

Attenuation tanks had been referred to in previous correspondence, but SW did not know where any might be located.

SW reiterated that there were no signs or symptoms of lack of capacity in the current local system. Recent incidents were discussed further below.

2) Future Development

Charlotte gave a very helpful outline of SW’s policies and procedures in respect of new development.

SW wished to make clear that it is not a Statutory Consultee in respect of the planning process, although it is a specific consultation body in respect of local plans. SW encourage consultation in respect of “major” developments – greater than 10 homes.



Consultation Statement

It is required to serve new developments and cannot refuse new connections. If Planning Permission is granted without drainage conditions, then inadequate capacity cannot be used as a reason for non-connection.

Since SW would normally always respond to any major development initiatives, PNDP asked why there had been no comment in respect of what is known locally as the Pippins development on Main Street. SW said that it had no knowledge of it. PNDP went on to state that the particular development was on a site designated for 45 houses under the RDC 2019 DaSA and that would be an increase of over 10% of the estimated current connections. SW agreed to review such an increase in the light of the current capacity of the system.

Action Mike undertook to send the necessary references, which was subsequently done in his email of 9th June. The application was RR/2021/1511/P in the RDC system. The total number of homes envisaged is 45. Response is awaited from SW.

Action Charlotte undertook to send a copy of her Powerpoint presentation 'Planning for Future Growth'. This was subsequently done as an attachment to Catherine's email of 9th June.

3) Recent Incidents

SW restated that there was no evidence of under capacity locally. Complaints regarding blockages are followed up and Jetting or Heavy Jetting takes place as deemed necessary, organised by mobile crews. Pipes are investigated with camera gear to identify the reasons for blockages.

SW stressed the importance of reporting and logging incidents, so that appropriate follow-up could be ensured. It was confirmed, though, that internal SW data on such incidents were not publicly available outside the organisation.

4) Future Contact

Catherine confirmed that she would be the contact in future for any further matters raised by the PNDP group. The discussion might have continued for some time, but the one hour time allocation having expired, the meeting closed at 3.00 pm.



Consultation Statement

Annexe for Information Purposes
Southern Water

Informal Agenda
Teams Call 9th June 2022 2.00pm

- 1 General Introductions - people / roles and PNDP intention
- 2 Local Network
 - As perceived by SW
 - Maps - accuracy/detail/availability
 - Coverage - location of attenuation tanks
 - Current capacity of the system
 - Foul only/misconnections
 - [Overflow history]
- 3 Recent incidents
 - What has happened?
 - What causes them?
 - Availability of records and information to us
- 4 New development connections
 - Theory/practice
 - Network reinforcement - timescales/planning
- 5 Future contacts for us



Consultation Statement

Annexe CS2 : Responses from Stakeholders and Others

Many of the responses were received from the online survey form at SurveyPlanet. Respondents had the option of writing about specific policies or writing a general unstructured response. The results were downloaded as a CSV file and converted to the attached table.

Another group of responses were received as a standard letter with respect to the Cornerways site attached to emails. In Section 4 they are attributed to 'Multiple respondents'. The respondents were *[some interpreted signatures]* :

Jax Webster	Evet	Robin Dent
Liam Monks	G Fry	C Hall
Jan Weston	W Holcombe	R Elliot
A Bacu??	K Onger	Illegible
Illegible and Illegible	Munn??	A Bones
S Baumer?	Owen??	C Buchwer
Riley Robins	Mr and Mrs Weller	P and N Raise
Andy Ginn	Stuart Pope	K Tacon
Ruth Feeney Brown	M Goodsell	Mr and Mrs Taylor
E Manklin		

A copy of the standard letter is included below. Note that a fair proportion of the letters are dated before the start of the Consultation Period so were signed without seeing the draft Plan.

A representation was received from Ethical Partnership, a planning consultancy, said to be on behalf of Peasmarsh Country Care Home Ltd. No such company is registered with Companies' House. Click on the image of the front cover on page 75 to open the original file with Acrobat.

A hardcopy feedback form was received. It was transposed into word processing for legibility reasons.



Consultation Statement

Online comments received via SurveyPlanet CSV file

<p>Dominic Manning</p>	<p>Congratulations to the PNDP volunteer group for preparing a truly outstanding document. It is well researched and evidenced, clearly written and presented, well supported by maps, figures and images. The same applies to the addendum documents. I am very supportive of the proposed NDP.</p> <p>I have a few minor comments:</p> <ul style="list-style-type: none"> - Policy L7: you mention 'traffic-free' routes. Maybe there is scope to add or amend this to read 'active travel' routes. This would enable consideration of other non-motorized means of physical travel other than walking or running, to include for bicycles, wheelchairs and scooters. This said, I'm aware this is nowadays less clear cut, as these can all be powered by batteries! - Policy I6: you do well to emphasise the precariousness and inadequacy of the services serving the village, and the extent to which this puts in doubt any new development. I think you should add a paragraph relating to landlines. It is proposed to discontinue 'analogue' landlines by the end of 2025, see https://www.ageuk.org.uk/information-advice/money-legal/consumer-issues/changes-to-landline-telephones/ <p>So if there is a power cut (and I know from my own experience how readily these occur), landlines will no longer work. The advice then is to use a mobile, however these will not work either unless mobile masts have adequate power back-up. It will require vulnerable residents to purchase satellite phones costing in excess of £600!</p> <ul style="list-style-type: none"> - Policy E1. This references use classes A1-A5, however these were revoked as of 1.9.2020, see https://www.planningportal.co.uk/permission/common-projects/change-of-use/use-classes. Class A 1/2/3 were effectively replaced with Use Class E(a,b,c). A4/5 uses were not covered by Use Class E and became defined as Sui Generis. Also, Class B1 It is effectively replaced with the new Class E(g).
<p>Jeremy Patridge</p>	<p>General</p> <p>Development in this village will be detrimental to the existing available infrastructure.</p> <p>The drainage is inadequate and further development will jeopardise the already inadequate performance of the system.</p> <p>The condition of the roads through the village is disgusting with useless patching being washed out in the frequent heavy rains of late.</p> <p>The absence of a surgery is not good for any expansion of housing which of course will contain a level of social accommodation. Influx of more families will put unwanted pressure on the local primary school also.</p> <p>A small level of development may be feasible but numbers that have been mooted would not be so or practical.</p>



Consultation Statement

Simon South	<p>General</p> <p>I wish to express my support for the proposed neighbourhood plan . Its balanced approach and consideration for the wider village is a fair reflection.</p>
John and Jean Fisher	<p>General</p> <p>As new residents to Peasmarsh we have had to quickly familiarise ourselves with the new proposed development and plans.</p> <p>We have areas of concern:</p> <p>These being the facilities and infrastructure in the village which in our view would struggle to support a further housing development.</p> <p>Sewage and drainage is an issue, how the new properties will impact on this is a cause for concern and potential impact for flooding/ surface water on adjoining properties and land. I understand that this has been a major problem for a new housing in Tenterden which was unable to cope with the recent incredibly wet weather and has flooded properties. There is potential for this from such a development as extremes of weather become the norm.</p> <p>Impact on wildlife and ancient trees is also a concern.</p> <p>Nesting birds live in the old trees abutting the proposed site and there is an old oak tree. It is highly likely preparation of land for building will disturb both trees and wildlife.</p> <p>We reside close by and have both newts and stag beetles in our garden. Impact on the wildlife would be considerable.</p>
Mel Goodsell	<p>General</p> <p>It looks as though a lot of work has gone into the development of this plan, and I wanted to thank everyone who has contributed.</p> <p>I did have one concern in that one site mentioned in the allocation of sites section, PEA L01 Cornerways, was not assessed by the consultants. I was pleased that this fact was mentioned in the plan, but didn't understand why, therefore, it had been seen as an acceptable site. When I had originally seen the name Cornerways, I had thought it was the house right at the end of School Lane where it meets Main Street.</p>
Marcus Gould	<p>General</p> <p>Rother District Council is determined to build in Peasmarsh. It cannot be stopped. That is a given.</p> <p>The process seems to be that WITHOUT the PNDP, the council has free rein to allow building wherever it likes, unrestricted other than by planning law.</p> <p>WITH the PNDP, the council is theoretically restricted in to only building on a limited number of sites.</p> <p>Those limited sites have been selected by the PNDP on a least worst basis. There is no 'best' place to build large numbers of houses in Peasmarsh. The PNDP is a damage limitation exercise.</p>



Consultation Statement

	<p>I am concerned that, at any future vote, this may not be clear. There is a risk that villagers will see a vote against the PNDC as a vote against building: It isn't!</p> <p>We cannot vote against building, we can only vote for where houses are built.</p> <p>It will be an emotionally-led vote and I feel this could lead to a misunderstanding of facts.</p>
Deborah Gbate	<p>Infrastructure Policy I3</p> <p>(iii) Improving road safety... mitigate the effects on non-motorised transport users... including pedestrian footpaths and cycle ways</p> <p>Nothing further</p>
	<p>Infrastructure Policy I7</p> <p>(i) Promoting improvements to telecoms incl cell phones and broadband : Strongly Agree</p> <p>This is vitally important for the local economy as well as many other aspects of health and social wellbeing. I feel this policy should be strengthened and made more pro-active since some of the most rural properties in the parish are often without any comms at all, sometimes for quite extended periods. Broadband here is mostly non-existent. Those of us who work or run businesses from home are often badly affected and it inhibits expansion and growth.</p>
	<p>General</p> <p>This is a most impressive and thoroughly-researched document, very clearly written and laid out, and I thank the Parish Council for the hard work that has gone into it. As a nationally-active social policy professional, working from home in Peasmarsh since 2015, I would strongly encourage the council to place heavy and pro-active emphasis on the aspects of digital infrastructure that will enable businesses, and the younger sections of the community to thrive. So much will depend on this in future - including access to health services, work, and knowledge and information. Without functioning internet and phones throughout the parish Peasmarsh will struggle to compete with other rural areas that are better served.</p>
Andreas Baas	<p>Site Allocation Policy?</p> <p>7.5 Development Sites Allocation</p> <p>Nothing further</p>
Mrs S. Cavilla	<p>Infrastructure</p> <p>Infrastructure 2.5 and 2.covered in Policy 14, D4 and Policy 18</p> <p>Nothing further ...</p>
	<p>Housing Policy H3</p> <p>Conversion of rural buildings to residential use : Strongly Agree</p> <p>Rather than build on greenfield sites convert rural buildings to residential use</p>



Consultation Statement

	<p>Infrastructure Policy I8</p> <p>Developer obligations : Strongly Agree</p> <p>When future developers are being considered they should be assessed against their track record of how they deal with problem tenants and the impact on the area and other residents.</p> <p>New developments in recent years has caused flooding in other areas of the Village. People are moved into this village from other areas and very few take part in village life</p> <hr/> <p>General</p> <p>Firstly I would like to comment how impressed I am with the amount of detailed research and work by so many individuals and organisations that has gone into the Peasmarsh Neighbourhood Development Plan. It is very considered and well thought out.</p> <p>Any future developments should be community led for and by local people and should protect the natural environment.</p> <p>Redundant buildings should be re-used together with brownfield sites and infill rather than greenfield sites which have been used for crops and grazed by sheep and cows for many years.</p> <p>Policy L6 Protection of local green space is very important as is Policy L1 conservation of landscape and heritage assets. Peasmarsh is a rural village not a town!</p> <p>Flooding and sewage are major issues and this is not helped by the many natural springs in the village such as the one on the left hand side going up School Lane. Recently after heavy rainfall there also appeared to be a problem on Main Street with a natural spring on the left hand side going towards the Maltings.</p> <p>When turf on Tanyard field was cut and sold this action resulted in many properties on Main Street being flooded twice - once before Christmas and a few weeks after Christmas as the water swept down the field over the clay subsoil. Also previous applications for Tanyard field have been rejected due to water and sewage problems which are still not resolved.</p> <p>The Church which is situated at the top of the village also suffers from flooding with the result that at times several graves lie under water - again due to the clay subsoil. The clue is in the name - Peasmarsh!</p> <p>In Policy I8 - Developer Obligations I made reference to how future developers should be assessed against their track record. Please be aware that Optivo has consistently failed over a number of years to address ongoing problems in School Lane despite letters and emails from many people with photographic evidence. No meaningful response has ever been received or action taken.</p> <p>Also when involved in new building such as the one at the Maltings, the original residents were not rehoused in the new development - the open green area was built on - a large car park put in- and a 3 storey development put up (the only 3 storey development in Peasmarsh) This had the result of dominating other residents and caused water problems</p>
--	--



Consultation Statement

	<p>so after heavy rainfall Hop Gardens (lower down) had their gardens flooded.</p> <p>As I also commented people are moved into the village from other areas and very few take part in village life. We have more social housing already - double the number in the rest of Rother.</p> <p>Transport is poor so cars are required to reach surgeries, dentist and hospitals.</p> <p>I am concerned about the lack of resources for young people in the village as Brownies, Guides, the Youth Club and the Sunday School have all ceased to exist during the time I have lived here.</p>
<p>Matthew Batchelor</p>	<p>No comments captured?</p>
<p>Peter Mackay and Vanessa Smith</p>	<p>General</p> <p>Thank you for the opportunity to comment on the final draft.</p> <p>We were impressed with the extent and details of the documents that have been prepared and we learned a lot!</p> <p>The assessment highlights some general issues about development in Peasmarsh, namely:</p> <ul style="list-style-type: none"> • The inadequate and unreliable sewage system • A lack of school capacity • The absence of doctors and dentists • The poor public transport provision • The poor telecommunications • The shortage of amenities in general, other than Jempson's, making Peasmarsh a 'corridor' village. <p>Policy S2 / PM01</p> <p>We would like to comment in more detail on the proposal for the Flackley Ash site (PM01), as this is the one we have most knowledge of.</p> <p>It is, as the draft report describes, a small rural hamlet of 6 houses, widely spaced apart and positioned alongside a narrow winding country lane.</p> <p>We have referred to the National Planning Policy Framework 2021 (NPPF) and are minded of the latest Government decision to revoke the target of 300,000 homes a year, instead making the target "advisory" and allowing councils to build fewer homes if it can show that hitting the target would significantly change the character of an area, an exemption expected to particularly apply to rural and suburban communities.</p> <p>The NPPF (paragraph 20) outlines how there should be sufficient provision made not least for the infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change, community facilities and conservation, and enhancement of the natural, built and historical environment (and more!).</p>



Consultation Statement

	<p>In our comments below we are guided, as you have been, by these policies and in particular that it “must be taken into account in preparing the development plan”.</p>
	<p><u>Rural exception site</u></p> <p>The Flackley Ash site (PM01) is designated as a “rural exception” site, for accommodating households who are current residents or have existing family or employment connection.</p> <p>Should the proposed development go ahead, how would the criteria for ownership be protected by the developer or the PNDP? Who would oversee this and what recourse would there be to ensure the “rural exception” nature of the site?</p> <p>What evidence is there for this type of housing among this constituency?</p>
	<p><u>RDC preferred area for future development</u></p> <p>The Flackley Ash site is not within the RDC preferred area.</p>
	<p><u>Sewage</u></p> <p>The PNDP Report identifies the problem of the sewage system.</p> <p>As far as we know, none of the houses in the Flackley Ash hamlet is connected to the main sewage system and therefore rely on individual systems (such as septic tanks, digesters etc).</p> <p>Any development would require similar individual facilities that are, as your report indicates, expensive to install. In addition, your development proposal makes no mention, nor does it consider the provision, of providing an improved infrastructure for the established housing in Mackerel Lane, which would appear to ignore the first objective of achieving sustainable development (NPPF 8).</p> <p>An additional point that is also not raised is the ongoing costs of such units that require privately funded servicing and emptying on an annual basis, and those costs can be onerous. Such additional financial burdens could detract from the social objective to provide a range of homes to meet the existing community needs and tenure of houses needed for different groups in the community, without attracting the more affluent, or second home owners (NPPF 8).</p>
	<p><u>Vehicular Access and Extra Traffic</u></p> <p>Your recommendation does not address vehicular access, extra traffic, increased noise, visual impact upon two listed buildings, or effects on the environment.</p> <p>We assume that access to the development site would have to be via Mackerel Hill, which is a narrow country lane, used by farm traffic and a few houses, with an extremely narrow entrance to and from Mackerel Hill onto the A268. The surrounding area is actively farmed and busy with large farm vehicles.</p> <p>You are probably aware that in recent years two proposed developments at this end of Mackerel Hill have been denied by Rother</p>



Consultation Statement

	<p>District Council at least partly on the basis that the country lane is unsuitable for additional traffic (both of those planning proposals involved only one newbuild each).</p> <p>Given the number of houses envisaged by your recommendation, traffic (by private cars, and accompanying delivery and servicing vehicles etc) would inevitably more than double traffic on a country lane unsuitable for that amount of usage (and has been deemed so by previous Council refusal to planning applications). This issue would continue to require comment and approval by the ESCC Highways authority and National Highways.</p> <p>There is no pavement for pedestrians, which makes it hazardous to walk along Mackerel Hill to get to the main road (to Jempsons/bus stop/post box etc) and not least the village core, including the school and other facilities.</p> <p>Such is the narrow nature, poor visibility and lack of speed limit of the winding lane it would be near impossible for a wheelchair user or persons with physical disability to safely use Mackerel Hill, and indeed the same applies to bicyclists.</p> <p>Thus, the siting of such a development on Mackerel Hill necessarily implies a dependence upon the car for the use of village amenities (church/hall/pubs/school) and does little to address recommendations (NPPF 2) of moving to a low-carbon environment. It also highlights the poor transport infrastructure in Peasmarsh village and one that is greatly increased at Flackley Ash, being well outside of the village core.</p>
	<p><u>Increase in number of proposed Dwelling</u></p> <p>The final draft proposes 10 houses to be developed on the Flackley Ash site, which is different from the previous plan of 3 houses. No substantive reason is given for this increase.</p> <p>Such an increase in houses would develop the area from the existing 6 houses to 16 houses, an increase in a rural area, with an already poor infrastructure, of 166%.</p> <p>This would appear to be a heavy overloading.</p> <p>The NPPF (64) states “Provision of affordable housing should not be sought for residential developments that are not major development, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer).</p>
	<p><u>Increased Noise and Visual Impact</u></p> <p>There is no street lighting in Flackley Ash hamlet, nor should there be – the surrounding countryside has a wide variety of wildlife, much of it nocturnal, and the adjacent fields are used by farmers as grazing land for livestock. Can it be guaranteed that any new development would not require outside lighting at night?</p> <p>A development of 10 dwellings would also have a detrimental and disruptive effect on the biodiversity and habitat of the wealth of wildlife and protected species of the area by the increased movement, noise, lighting and chemical pollution.</p>



Consultation Statement

	<p>There is no provision in the siting of the proposed development to safeguarding future health and retention of wildlife habitats.</p> <p><u>Visual Impact & Heritage Constraints</u></p> <p>The Flackley Ash Hotel is described in the PNDP Report as being in a “totally rural setting”. The proposed site is deemed medium to high visual and character sensitivity with low capacity to accept change through development.</p> <p>The suggested 10-dwelling development would change the character of the Flackley Ash hamlet and be contrary to government recommendations (in NPPF 2021) and more recently supported by the Government’s decision making the housing policy “advisory”.</p> <p>Flackley Ash Hotel and the Grade II listed cottage that both abut the proposed site would be greatly affected and it is hard to understand how their architectural heritage is being protected.</p> <p><u>Effects on the Environment</u></p> <p>Comments have previously been outlined about the protection of our countryside and wildlife, as has the necessity of the site to force people to use their car.</p> <p>The proposed development, being outside the identified development area and also the preferred area identified by RDC, does not address nor support any measures to mitigate climate change and adaption (NPPF Strategic Policies).</p> <p>The NPPF identifies the existing trees as “significant’ rather than ancient or veteran but no expert report is available to support such an assessment.</p> <p>The trees that are present are home to many birds and other wildlife species and therefore are a “significant” habitat.</p> <p><u>Poor Telecommunications & Frequent Electricity Supply Disruption</u></p> <p>The telecommunications at Flackley Ash is extremely poor, making mobile phones frequently redundant. Likewise, the electricity supply is subject to intermittent outages, adding to telecommunication problems.</p> <p>As there is no main gas supply, as an alternative energy source, the day to day living of residents is frequently disrupted.</p> <p>There is no consideration in the PNDP of any provision being made or considered for network updates in the Flackley Ash area to support the proposed increased housing development.</p> <p>The PNDP report refutes any overhead powerlines on the proposed site as being an ‘optical illusion’. However, a cursory inspection appears to indicate two overhead power lines to be present, either within or next to the proposed site.</p> <p><u>Community Facilities</u></p> <p>The existing Peasmarsh community facilities are sited in the village core, where residents can walk or cycle to them. The Flackley Ash site offers no such existing provision whatsoever and no areas that could accommodate new community provision (NPPF – Strategic Policies).</p>
--	--



Consultation Statement

	<p>Thus the site, being well away from the existing community facilities and services, risks becoming a ‘satellite’ area to the village core.</p>		
	<p><u>Why is Flackley Ash site more suitable than other sites?</u></p> <p>Some of these factors as we have highlighted are the very same that have been used elsewhere in the Development Plan to identify other sites as being unsuitable for development.</p> <p>There seems to be some inconsistency of approach if these factors are not similarly considered in respect of the Flackley Ash site.</p> <p>For example;</p> <table border="0" style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: top;"> <p>PEA01: Oaklands Site Comparison</p> <p>Factors cited for unsuitability:</p> <ul style="list-style-type: none"> *Has Vehicular access difficulties Ash site *Difficult Cycle and Pedestrian Access Ash site *Adjacent Ancient or Veteran Trees includes old roosting trees *Harm for a Grade II Listed Building flanked by 2 Listed Buildings *Adjacent to existing development boundary outside of boundary *Requires installation of SuDS system Ash *Low visual sensitivity sensitivity *Moderate capacity to accept change for housing <p>Conclusion: It appears that the Oaklands (unsuitable site) identifies many factors that pertain to the Flackley Ash site (deemed suitable).</p> <p>PEA07: Kings Head Site Comparison</p> <p>Factors cited for unsuitability:</p> <ul style="list-style-type: none"> *Proximity to Listed Buildings flanked by 2 Listed Buildings *Problems with Access Issues Ash site *Remote from development boundary of boundary *Remote from main residential area further remote </td> <td style="width: 50%; vertical-align: top; padding-left: 20px;"> <p>PM01: Flackley Ash</p> <ul style="list-style-type: none"> *As does the Flackley *As does the Flackley *Flackley Ash site *Flackley Ash site *Flackley Ash is *As does Flackley *Medium to high visual *Low capacity to accept for housing <p>PM01: Flackley Ash</p> <ul style="list-style-type: none"> *Flackley Ash site *As does the Flackley *Flackley Ash is outside *Flackley Ash site is </td> </tr> </table>	<p>PEA01: Oaklands Site Comparison</p> <p>Factors cited for unsuitability:</p> <ul style="list-style-type: none"> *Has Vehicular access difficulties Ash site *Difficult Cycle and Pedestrian Access Ash site *Adjacent Ancient or Veteran Trees includes old roosting trees *Harm for a Grade II Listed Building flanked by 2 Listed Buildings *Adjacent to existing development boundary outside of boundary *Requires installation of SuDS system Ash *Low visual sensitivity sensitivity *Moderate capacity to accept change for housing <p>Conclusion: It appears that the Oaklands (unsuitable site) identifies many factors that pertain to the Flackley Ash site (deemed suitable).</p> <p>PEA07: Kings Head Site Comparison</p> <p>Factors cited for unsuitability:</p> <ul style="list-style-type: none"> *Proximity to Listed Buildings flanked by 2 Listed Buildings *Problems with Access Issues Ash site *Remote from development boundary of boundary *Remote from main residential area further remote 	<p>PM01: Flackley Ash</p> <ul style="list-style-type: none"> *As does the Flackley *As does the Flackley *Flackley Ash site *Flackley Ash site *Flackley Ash is *As does Flackley *Medium to high visual *Low capacity to accept for housing <p>PM01: Flackley Ash</p> <ul style="list-style-type: none"> *Flackley Ash site *As does the Flackley *Flackley Ash is outside *Flackley Ash site is
<p>PEA01: Oaklands Site Comparison</p> <p>Factors cited for unsuitability:</p> <ul style="list-style-type: none"> *Has Vehicular access difficulties Ash site *Difficult Cycle and Pedestrian Access Ash site *Adjacent Ancient or Veteran Trees includes old roosting trees *Harm for a Grade II Listed Building flanked by 2 Listed Buildings *Adjacent to existing development boundary outside of boundary *Requires installation of SuDS system Ash *Low visual sensitivity sensitivity *Moderate capacity to accept change for housing <p>Conclusion: It appears that the Oaklands (unsuitable site) identifies many factors that pertain to the Flackley Ash site (deemed suitable).</p> <p>PEA07: Kings Head Site Comparison</p> <p>Factors cited for unsuitability:</p> <ul style="list-style-type: none"> *Proximity to Listed Buildings flanked by 2 Listed Buildings *Problems with Access Issues Ash site *Remote from development boundary of boundary *Remote from main residential area further remote 	<p>PM01: Flackley Ash</p> <ul style="list-style-type: none"> *As does the Flackley *As does the Flackley *Flackley Ash site *Flackley Ash site *Flackley Ash is *As does Flackley *Medium to high visual *Low capacity to accept for housing <p>PM01: Flackley Ash</p> <ul style="list-style-type: none"> *Flackley Ash site *As does the Flackley *Flackley Ash is outside *Flackley Ash site is 		



Consultation Statement

	<p>Conclusion: It appears that the Kings Head (unsuitable site) identifies factors that pertain to the Flackley Ash site.</p> <p>PEA024: Tanyard Site Comparison PM01: Flackley Ash</p> <p>Factors cited for unsuitability:</p> <ul style="list-style-type: none"> *Significant habitat compromise habitat compromise site *Significant wildlife *Significant trees includes significant trees *Flackley Ash site *Impact upon Grade II listed buildings Listed Buildings *Impact upon Grade II *Next to development boundary development boundary *Outside of *Conserving and enhancing landscape or enhance the rural site *Does not conserve *Cost of SuDS significant significant *Cost of SuDS *Abuts boundary outside of RDC's of RDC's Policy *Outside of boundary <li style="padding-left: 40px;">policy of preferred area of preferred area *Medium to high visual sensitivity sensitivity *Medium to high visual <p>Conclusion: It appears the Tanyard site (unsuitable) identified factors that pertain to the Flackley Ash site (deemed suitable).</p> <p>PEA025: Tanhouse Site Comparison PM01: Flackley Ash</p> <p>Factors cited for unsuitability:</p> <ul style="list-style-type: none"> *Remote from development boundary of boundary *Flackley Ash is outside *Remote from main residential area further remote *Flackley Ash site is *Next to Listed Buildings flanked by 2 Listed Buildings *Flackley Ash site *Cost of SuDS significant significant *Cost of SuDS *Medium to high visual sensitivity sensitivity *Medium to high visual *Moderate to low ability to change *Low capacity to accept <li style="padding-left: 40px;">to mitigate impact of change for housing <p>Conclusion: It appears the Tanhouse site (unsuitable) identified factors that pertain to the Flackley Ash site (deemed suitable).</p>
--	---



Consultation Statement

	<p>PM05:Malthouse Comparison</p> <p>Factors cited for unsuitability:</p> <p>*Adjoins a listed building flanked by 2 Listed Buildings</p> <p>Conclusion: It appears the Malthouse site (unsuitable) identifies a factor that pertains to the Flackley Ash site (deemed suitable).</p> <p>PEALO2: Tanhouse 2 Site Comparison</p> <p>Factors cited for unsuitability:</p> <p>*Close to listed building flanked by 2 Listed Buildings</p> <p>* SuDS challenging and costly and costly</p> <p>*Narrow rural lane, gently curving blind bends</p> <p>* Moderate to high visual & character & character</p> <p>with low capability to accept change for housing</p> <p>Conclusion: It appears the Tanhouse 2 site (unsuitable) identifies factors that pertain to the Flackley Ash site (deemed suitable).</p> <p>We do not consider the Flackley Ash site to be a “reasonable alternative” and does not appear to be based upon “proportionate evidence”, nor can it be described as a sustainable development (NPPF).</p>
--	--



Consultation Statement

Standard Letter received via email

TO: contact@peasmarshndp.uk

Dated: 5/10/22

Dear Peasmarsh NDP Committee

I wish to confirm my opposition to the NDP committee's draft plan approving PEAL1 Cornerways as a potential site for development and comment as follows:

- 1. Lateness of submission** - the site was submitted very late (8 weeks ago) and long after the lengthy consultation process run by AECOM. It has not been afforded the same scrutiny or consideration as the other 9 sites that were part of the consultation process, and has only been considered by the NDP committee with very little notice provided to residents about its inclusion in the plan to allow for comments. This directly contrasts with the detailed and lengthy presentations run by AECOM on other sites eg Tanyard. For this reason the site should not be included for consideration in the plan unless it has been afforded the same consultation process as the other sites.
- 2. Contradictory reasons for approval**- the NDP committee have refused other sites on grounds which would also apply to Cornerways but these do not appear to have been considered when making the decision to approve Cornerways for development. For example comparing the assessment/conclusions for the Tanyard site :

a) Tanyard is a P1 site and claimed to be unsuitable re paragraph 176 of NPPF however Cornerways is P3 which has even less scope to accept change and yet this has been overlooked as a reason to reject the site. Cornerways clearly is more unsuitable for development having regard to p176 but this has been minimised in the decision making.

b) Tanyard was rejected as it impacts the setting of 2 grade 2 listed properties. Cornerways impacts on a non-designated historic property and there is a veteran tree within the proposed site and it is close to ancient woodland and impacts 2 footpaths including the High Weald Landscape Trail. The assessment claims that Cornerways is next to and connected to a built up area when there are in fact only 3 properties close by unlike at Tanyard. Although there are no listed buildings impacted there are other equally important scenscape considerations which have not been taken into account regarding Cornerways.

c) Tanyard was rejected as being in the east of the village which is claimed in the NDP not to be within RDC's preferred area for development which is claimed to be the west. This is simply not accurate. RDC's NDP states at paragraph 11.173 that "*the far west visually exposed and typified by a close network of historic field boundaries*". There is no comment anywhere in RDC's plan that they prefer the far west for development. They have approved the Pippins site which is central west and not the far west. What is clear in RDC's NDP is that they want "*larger sites*" which Tanyard is although this is not referred to in the assessment of Tanyard.

3. Additional Objections to Cornerways as a potential site:

- i. Access to the site is via School Lane which is an already busy road with severe traffic issues, speeding concerns and restricted access to larger vehicles and emergency service vehicles. The road is a narrow unlit country lane that cannot withstand an increase in traffic. All traffic would have to pass the school and



Consultation Statement

there are already access issues during term times. There is no footpath to allow pedestrians to safely walk when two vehicles are passing

ii. The site is on a blind bend which is extremely dangerous and has already resulted in the death of a dog and numerous car accidents. 7 more houses are likely to have 2 cars each adding to the issues and potential for further accidents.

iii. The site has already been highlighted by RDC as being more exposed to the wider landscape and is in an SSSI impact risk zone. It is assessed as P1 and has the least capacity for change than any other area in the village. RDC's NDP at paragraph 11.175 states that it *"follows boundaries to prevent inappropriate backland development from encroaching into the countryside and harming the rural setting of the village"*. Cornerways is within the boundary and any development of the site would fall foul of p11.175.

iv. There is a veteran oak tree within the boundary of the site and there is ancient woodland opposite the site all of which would be impacted severely by any development. Contrast the position with Tanyard where the veteran tree was not within the site boundary and which is only P1 and has a greater capacity to accept change, but was still rejected. Cornerways should similarly be rejected.

v. There is no provision for sewage or drainage at the top of School Lane and any development would only increase the burden on the already inadequate system. Run off drainage would be increased by development and there would be increased risk of flooding further down School Lane.

vi. Cornerways has not been afforded the same level of consideration and opportunity to comment as other sites that were included in the AECOM assessment. AECOM actually recommended Tanyard as suitable for development but it was rejected by the NDP committee following wide publicity about the proposals and detailed presentations encouraging residents to comment/oppose the proposals. The same process has not been afforded to Cornerways. There has been virtually no publicity about the site being included now.

viii. Cornerways is outside the existing development boundary and to include it would mean extending the boundary contrary to RDC's own planned boundary. Tanyard fell within the boundary but was still rejected.

ix. The NDP recommends only small developments of under 10 properties and Cornerways states it is only for 7 although the calculation when done in accordance with the formula could provide for 10. However there was nothing suggesting that Tanyard wasn't suitable to have a smaller development of 10 houses rather than the maximum 40 plus suggested.

ix It is difficult to see how the committee could have reached the conclusion that Cornerways is suitable for development having regard to the various issues affecting the site and particularly where similar issues have formed the basis for rejection of other sites.

Kindly ensure that my letter and comments are included and considered when reviewing the draft plan and that such objections are duly noted within any consultation process.

Yours faithfully,

[Redacted signature]



Consultation Statement

Representation from Ethical Partnership

Click on the image below to open the pdf document.





Consultation Statement

Public Consultation Feedback Form

Georgina Durham :

Policy D4

Solar roof panels for more energy generation

Car chargers and also around the village

No large “service charges” for residents

Some trees require felling and fallen trees to be dealt with by Council timeously

Disabilities all age groups- consider accessibility to parks, e.g.

Bus Services - Stage Coach dropped 9.30 and lunch services. Elderly generally prefer to go out early, return early. Long wait in Rye, e.g. to get back home.

Surface water by Brickfields a problem as is bubbling of sewage. Likewise Hop Gardens.

School Lane already under stress from traffic., access and parking. Not safe for children.

Hence no development should be considered near Horse and Cart.

Affordable housing. New homes to have solar panels, car chargers- eco-friendly.

Pumping Station inadequate, as is piping.

Suggestion. Site for development near Jempson’s -access sensible.

Beckley Flat outskirts of village

Past Cold Harbour Lane towards Rye



Consultation Statement

Annexe CS3 : Responses from Statutory Consultees

The following organisations were invited to comment :

Rother District Council :	<i>response received</i>
East Sussex County Council :	<i>response received</i>
Ashford District Council :	<i>'no comment' response received</i>
Kent County Council	
Adjoining PC's	
Homes England	
Natural England	<i>no response received before close of consultation</i>
Environment Agency	
Historic England :	<i>response received</i>
National Highways :	<i>response received</i>
The NHS	
Cell Operators	
National Grid :	<i>response received</i>
UK Power Networks	
SGN	
Southern Water :	<i>response received</i>
South East Water	
Rother Voluntary Action	
Action in Rural Sussex	

Responses received are on the following pages in the same order as above :

Peasmarsh Neighbourhood Development Plan 2021-2039

Pre-Submission Consultation Version

Regulation 14 Comments of Rother District Council

Overview

The draft Peasmarsh Neighbourhood Plan (PNP) is clearly the product of many hours of work and research. We are very pleased to see a Plan emerging that is beginning to respond to local issues and views, important drivers of a Neighbourhood Development Plan. Planning Practice Guidance states that *'It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.'* It will be helpful to return to the PPG as the Plan progresses and check that each policy responds to the guidance. Regarding the PNP evidence base, the PPG also sets out that *'Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan.'* The supporting documents to date demonstrate that this guidance is being followed.

The vision of the PNP is clear however it should reflect the stated objectives, therefore we recommend that the protection of the High Weald AONB is also recognised as an objective.

The text describes a parish that residents are proud of; it would be helpful for the reader/decision-maker if there were more photos to illustrate this. This is also pertinent for policies such as 'Protected Views' and 'Design', which would benefit from some visual aid. Whilst we support the majority of the maps being located in an appendix for ease of formatting, some, such as the map identifying proposed views to be protected, would be better placed by the policy with the views listed. We anticipate that the consultation statement will provide the evidence that these views, and other policy content such as L6:Protection of Local Green Spaces, are important to the Peasmarsh community.

We have advised in submitted comments, annotated within a copy of the draft Plan, that the supporting text does not always relate to the policy located within the same section, and the reader at times loses the thread of the narrative. It will make the Plan more coherent to the reader/decision-maker by ensuring that all text is relevant and contributes to the topic of each section.

We advise to avoid anecdotal comments and personal opinion in the Plan as these do not necessarily reflect the views of the whole community.

Please see below for our comments on each policy.

Page No.	PNP Policy	RDC Comments
15	L1: Conserve Landscape and Heritage Asset Settings	<p>The policy covers two distinct areas: landscape and heritage. We recommend that the Local Plan is revisited, see policies EN1 and EN2, as Planning Practice Guidance advises that neighbourhood plan policies should reflect the ‘unique characteristics’ of a specific area and not repeat local and national policy.</p> <p>We recommend that if landscape and heritage policies remain in the PNP that they highlight characteristics of the parish and go further than the Local Plan policy in terms of the local area. Otherwise, the Local Plan policies are sufficient for these areas.</p>
16	L2: Protection of Locally Significant Views	<p>We recommend that the views should be listed within the policy. It would be helpful for the decision maker to have the associated map by the policy.</p> <p>Is there evidence to support the selection of the views to demonstrate they have been identified by the community as valued and important?</p> <p>Also, please note that as the parish is located within the HW AONB, all the surrounding countryside has landscape value and care should be taken in the wording or supporting text to recognise this, as well as the fact that not only views that can be enjoyed by the public must be protected.</p>
18	L3: Protection of Trees and Woodland	<p>This policy would be strengthened by listing specific woodlands and veteran trees in Peasmarsh where possible.</p>
19	L4: Protection of Biodiversity	<p>We support this policy which addresses biodiversity off-setting and aims to ensure off-setting sites are found within the parish. Add wording to reflect this intent.</p>

19	L5: Protection of Habitats	Place the table in the supporting text to allow decision makers to easily see the list.
20	L6: Protection of Local Green Space	We recommend listing the proposed local green spaces within the policy and place the map within the section. Is there evidence to support the selection of spaces?
21	L7: Retain and Improve Public Access	This policy is a good opportunity to identify routes that you would like to encourage and see implemented.
23	I1: Recording of Infrastructure Issues	This isn't a land use policy but could be located in the 'Community Aspirations' section of the PNP.
24	I2: Bus Service	<p>A large portion of the draft would sit better in the 'Community Aspirations' section however the policy could read that 'Development will be supported when proposals include the provision of additional bus stops/bus priority lanes/community transport solutions...' which could be achieved through Section 106 agreements.</p> <p>Also, 'The PNP supports demand responsive transport...'</p> <p>Expand the policy remit to cover modes of sustainable transport e.g. cycle paths, improved pedestrian routes, access to bus and rail, EV charging points. The PNP has the potential to support the enhancement of existing routes that link to site allocations and the 'community aspirations' section can include a list of potential CIL funded projects.</p> <p>Unsure what 'All of the above will be undertaken at district, county and national level' means.</p>
25	I3: Improving road Safety and Traffic Impact	<p>This could be expanded into a 'Sustainable Transport' policy as the issues mentioned are due to an absence of good pedestrian and cycle routes to allow families to walk/cycle to the school.</p> <p>Criterion iii) could be strengthened by highlighting a route where this can be proposed and state the PNP supports this proposal.</p>

29	I4: Sewage System Improvement	<p>Policies must be positively worded 'positively prepared' (NPPF) and not restrictive in the manner of this policy. Reword as 'Development proposals which have undergone an independent capacity check will be supported...'</p> <p>The final sentence is unclear: 'district, county and national level'.</p>
30	I5: Surface Water Drainage	<p>It's not clear how you expect this to be measured. How does a DM officer measure this when determining a planning application for a site in Peasmarsh?</p>
32	I6: Power Supply	<p>Criterion ii) would benefit from editing for clarity.</p> <p>This policy could link to policy D4: Energy Efficiency and Sustainability.</p>
34	I7: Telecommunications	<p>Re-word to make clear what the policy intent is. Is the intent to manage the location of apparatus?</p>
34	I8: Developer Obligations	<p>We support this policy.</p>
37	I9: Access to High Quality Secondary Education	<p>This isn't expressly a land use policy and may be better placed in the 'community aspirations' section.</p>
40	E1: New Business Space Development	<p>Identifying a suitable site/sites would strengthen this policy.</p> <p>List the use classes you're referring to in the supporting text for clarity.</p>
41	E2: Adaptation of Existing Buildings for Live/Work	<p>As currently written this policy is a little confusing. Working at home is not considered as use class E, and extensions and outbuildings are currently covered by the DaSA policy DHG9, however if the intent of the policy is to facilitate outbuildings that are more than 20M from the main building (which requires permission in the AONB) a re-worded policy could be valid in support of home working.</p>
42	E3: Rural Building Conversion for Business Use	<p>Consider whether this adds to the existing CS policy RA4: Traditional Historic Farm</p>

		<p>Buildings? The existing policy is robust and this may undermine it.</p> <p>Policy H3 states that building conversion into residential will be supported. Which is the priority?</p>
43	E4: Promotion of Sustainable Tourism	How will the first criterion be quantified by a decision maker/DM officer?
50	H1: Housing Mix	The Core Strategy policy LHN1: Achieving mixed and Balanced Communities is more robust than this policy which may undermine it to some extent.
51	H2: Rural Exception Sites	Consider whether this adds to Local Plan policy.
51	H3 : Conversion of Rural Buildings to Residential Use	Consider whether this adds to Core Strategy policy RA4.
56	S1: Development Size	The justification for this policy is flawed as on pages 55-56 the PNP incorrectly interprets the meaning of “major” development in the NPPF, noting that “the definition is devolved to the decision-maker in order to allow a reduction in the limits [of 10 dwellings] should the nature of the designated area justify that.
60	S2: Allocated Sites	<p>This policy could unnecessarily restrict windfalls. The Plan doesn’t deliver windfalls, windfalls happen regardless, however the estimate for 20 dwellings to come forward as windfalls is reasonable.</p> <p>Is there evidence for the last sentence of Policy S2 (allocated sites) which says “<i>developments of more than three houses shall only take place on allocated sites</i>”? It could unnecessarily restrict windfalls (note that at least one windfall site in Peasmarsh in the past 10 years was for 4 dwellings – which is included in the 16 windfall dwellings counted on pg.45).</p> <p>Please see below for individual site comments.</p>

	S3 : Development Boundary	<p>Page 61 states: “<i>The allocated sites are capable of delivering 32 dwellings. In addition, it is reasonable to assume that infill sites and similar windfalls will, in the next 18 years, deliver 20 houses. On that basis, this Plan delivers a total of 52 houses.</i>” It is incorrect to include windfalls in the total of what the Plan delivers, the Plan doesn’t deliver windfalls, windfalls happen regardless, however the estimate for 20 dwellings to come forward as windfalls is probably reasonable.</p> <p>The second sentence implies that the Parish Council is the decision-maker, however this is the role of RDC as the Planning Authority. We recommend deleting this sentence.</p>
67	D1: Existing setting	<p>We recommend that the heading is changed to ‘Local Setting’ Delete the second sentence in the policy. The NPPF states that Plans must be positively prepared. Recommend that you amend to ‘Developments that have regard to the following will be supported’ Delete first sentence of criterion ii).</p>
	D2: Placemaking	See below.
	D3: New Homes	This policy does not differ to D2. If the policy intent is addressed in the Design Code, as all homes in the Plan are essentially ‘new’ development, we recommend combining D2 and D3 into one policy that aims to influence placemaking.
	D4: Energy Efficiency and Sustainability	<p>We support this policy and recommend that the various points are numbered for clarity.</p> <p>Regarding the last paragraph and criterion (i), is there AONB guidance for small-scale renewables?</p>
	D5: Dark Skies	We recommend that you define ‘essential purpose’.

Proposed allocations

- PM01 and PM02 are both proposed as rural exception sites of 10 dwellings. Exception sites would not normally be allocated, i.e. they are “exceptions” and are permitted where market housing would not normally be permitted. We understand that the PNP SG consider the exception sites as integral to the narrative of the Plan and have been identified in this way to allow for affordable housing, however, the PNP can allocate the sites for wholly or substantially affordable housing (as per Policy LHN4 of the Core Strategy), although neither of the sites are “within or adjacent to the settlement boundary” and so would not comply with Policy LHN4.
- PM03 and PEA01 are not allocated “but could become available in the longer terms should suitable vehicular access be found”. RDC supports this proposal subject to access and other assessments on the sites.

Comments on the sites

- PM01 – The site is not as well related to services as other sites and has to date been considered as an unsustainable location. Access is off a narrow lane with no footways, although it is only a short distance to the A265, which does have a continuous footway back to Peasmarsch on the opposite side of the road. As a minimum, pedestrian crossing facilities need to be provided on the A265 and footways improved, but even with these improvements the site is some distance from most services in the village (e.g. 1.2km from the school) meaning residents would be largely car-reliant. This is of particular concern, given that the site is proposed for wholly affordable housing.

Furthermore, development of the site would harm the rural character of the location (particularly if works are required to the narrow lane to facilitate access) and would appear to result in the loss of many trees currently within the site, although a recent site visit highlighted that many of the trees are ornamental and could be replaced with native species subject to an arboricultural survey. Development could also harm the setting of the nearby listed buildings.

- PM02 – While this is better related to some services than PM01, it remains at the far western end of the village. A new access and development here would change the rural character of this edge of the village location, breaking through a significant tree line and necessitating the removal of a number of mature trees. Access on to the main road, which currently has a speed limit of 40mph, is a major consideration for this site. There could also be an adverse effect on the setting of adjacent listed buildings.
- PM04 –A small residential development could potentially be accommodated, subject to the Highway Authority's acceptance of the access road and subject to careful design to protect the amenity of the adjoining dwellings.

- PEAL01 – This is an exposed and elevated site which has a strong rural character, development here would have an urbanising impact and be harmful to the AONB, contrary to paragraph 176 of the NPPF. Access would appear problematic, being via a narrow rural lane, which slopes steeply to the east. The NP states that the sewerage connection does not extend all the way along School Lane, if this is the case then would this be an issue for further housing? We are aware that the PNP *Policy 14: Sewage System Improvement* intends to ensure waste infrastructure is in place before development progresses.

Peasmarsh Villagescape and Design Code

It is encouraging to see the number of photos illustrating the Code which enable the reader/decision-maker to better understand the context of the PNP.

There are many character areas, however these are clearly identified in a map setting out the location of each. Whilst the introduction to the document has value and the individual character areas are well described, we recommend locating Section 3: Design Codes at the beginning of the document for ease of use in decision-making.

We are pleased to see that the High Weald Housing Design Guide has been referenced throughout the document.

EAST SUSSEX COUNTY COUNCIL RESPONSE, DECEMBER 2022

Thank you for the opportunity to comment on the Peasmarsh Neighbourhood Plan. The following are officer comments from East Sussex County Council (ESCC) which have been sub-divided into the respective disciplines for ease of reference. Where appropriate the specific section, policy or document within the consultation documents has been referred to.

If you have any queries on the County Council's comments, please contact:

Lisa Simmonds
Infrastructure Planning & Place Team
Communities, Economy & Transport
East Sussex County Council

1. Highways Authority

- 1.1 We welcome the reference to the poll regarding public transport in Peasmarsh.
- 1.2 We welcome the inclusion of information related to bus services/frequency. Also, we note the evidence related to poor bus/rail connectivity and frequent delays to bus services.
- 1.3 The nearest railway line (Rye) and connectivity to it is mentioned. We suggest including whether walking/cycling to the station is viable, or if the condition of the route to/from the station is conducive to active travel.
- 1.4 We would suggest changing 'Traffic' title on page 7 to 'Road'. The evidence included in this section from the Black Cat monitoring device is really useful to provide a picture of the congestion experienced on the road network.
- 1.5 Page 11 - In relation to the potential for the existing bus service being withdrawn, East Sussex County Council currently funds the 313 bus service used by school children between Peasmarsh and Rye College, along with the 361 college bus service linking to Bexhill College. Legislation does allow County Councils to subsidise buses which cannot run at a profit but are seen to be socially necessary for the community. Though there is discretion as to what services, if any, are provided within the limited funding available. Decisions have had to be made by East Sussex County Council on which services to support, using a hierarchy outlined in its public transport commissioning strategy. Providing for children not attending their nearest designated or nearest suitable school is not a service that would meet East Sussex County Council's funding priority. Whilst our understanding is that the Homewood School bus service is not immediately under threat of withdrawal, it would be very unlikely that East Sussex County Council would fund an alternative transport arrangement if it was.

- 1.6 Policy L7 for green infrastructure for all developments to be encouraged; is welcomed. Suggest reference is made that this could include dedicated walking and cycling routes compliant with the Government's cycle design guidance, Local Transport Note 1/20 [Cycle infrastructure design \(LTN 1/20\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120)
- 1.7 We suggest greater mention is made about active travel and providing walking and cycling infrastructure to connect people with places e.g. from homes to key services and facilities
- 1.8 We welcome recognition in the Neighbourhood Plan that 'Designating somewhere as a Local Service Village without considering public transport goes against that policy', 'that policy' being the Rother District Council (RDC) policy RA1 that requires new development be in locations accessible via a range of transport options in order to improve access to basic day-to-day services, particularly by public transport, walking and cycling. We also welcome the reference to RDC's green policy which says the availability of public transport and good walking and cycling routes is essential to minimise the risk of social exclusion, particularly for people without access to a car.
- 1.9 Pages 23 and 24 consider the lack of public transport in Peasmarsch which the NP states goes against RDC's policies. The inclusion in the Neighbourhood Plan that improved bus services and connectivity and Demand Responsive Transport (DRT) wants to be explored is supported.
- 1.10 Policy I2 should also consider the options available at a local level, for example in respect of DRT. Local people can provide services to other members of the local community to access appointments, services etc and can be led on a local level. This type of service exists elsewhere and case studies / best practice can be considered and adopted as appropriate.
- 1.11 Policy I3 on road safety is a useful inclusion and pursuing this is supported. It also covers consideration of improved walking and cycling infrastructure. This latter element could be separated out into a specific policy to cover improved connectivity through new walking and cycling infrastructure.
- 1.12 Page 34 'Social Infrastructure'- we are pleased to see the inclusion of safe and accessible green infrastructure for health and wellbeing. In relation to access to health services, alongside public transport this should include walking and cycling as well, where possible.
- 1.13 Any new infrastructure or changes to existing infrastructure, including tourism infrastructure, should consider EV ChargePoint's at the earliest stage. It is recognised that challenges remain in relation to power supply to the Parish, therefore supporting other types of e-transport (bikes scooters etc), could be considered, if the risks involved, in terms of safety, security, the absence of standardisation and regulation for these other types of e-transport, can be overcome.'
- 1.14 **Policy S1– Development size no greater than 10 dwellings.** A Transport Report is ordinarily required to support proposals of 5-35 dwellings and would unlikely require junction assessments as the impacts are unlikely to be significant. Any site

proponents are recommended to enter into pre-application discussions with the Highway Authority to discuss the scope of a Transport Report before a planning application is submitted so it can be addressed if and where assessments of the highway network are required (taking account of the site location and existing conditions) and the level of infrastructure improvements that would be necessary to support accessibility by all modes, with emphasis on active travel provision.

Housing Sites

- 1.15 **PM01 Flackley Ash.** The speed limit on Mackerel Hill is derestricted (60mph) and actual vehicle speeds are unknown. The position of access point for vehicles would depend on a 7-day speed survey to determine the appropriate driver sightlines required. Access on foot is a constraint due to the absence of footways or crossing point to reach the A268 footway network. Jempsons is 700m distant and within walkable distance, but primary school and pre-school are 2km away which would likely be out of walking range for younger children. Mill Lane bus stops are within a very short walk but infrastructure is required to support connections to the bus stops.
- 1.16 **PM02 – Woodside.** This site is on the north side of the A268 where there are no footways. Although it is close to village services, any vehicular access would need to meet the safety requirements for a 40mph road (120m driver sightlines) and be in a position that does not conflict with movements in and out of Tanhouse Lane. A means for pedestrians to connect safely to the existing footway network would be essential to reach neighbourhood services and to public transport provision. Existing bus stops are in excess of 400m from the site and additional provision is likely to be sought. Ideally, any new bus stops would serve Jempsons also (noted that there are no bus stops there) and may require conjoined working with the Jempsons landowner to support sustainable travel in the vicinity of this site for northwest and southeast bound stops.
- 1.17 **PM04 Orchard Way – 5 dwellings.** This site is served from the 30mph section of Main Street. The access road is single track and already serves a number of dwellings (4 from a desktop study). The access width with Main Street is required to be 5m wide minimum to allow entry and egress safely, and to prevent unnecessary waiting in Main Street. For additional dwellings, a refuse truck will require to enter, turn and exit and any proposal would need to accommodate this. A crossing point for pedestrians would be a requirement to allow access to nearby primary school and Horse & Cart PH (although this looks like it has closed down recently).
- 1.18 **PEA L01 Cornerways – 7 dwellings.** This site is located in a corner plot of land on the south side of School Lane where the speed limit is 30mph. There are no footways and School Lane has irregular carriageway widths, being quite narrow in sections. The alignment of the road restricts driver visibility both in a forwards direction and would pose a challenge to seeking a suitable access provision to serve the site. As a starting point it is recommended that speed surveys are carried out to ascertain the actual speeds so the driver sightline distances can be recommended as it is likely that speeds do not exceed 30mph given the highway conditions. There may be a requirement to remove some boundary vegetation to accommodate sightlines for both vehicular and non motorised accessibility. There is a PRoW (17/18b/c) opposite

the site that provides a traffic free route to Main Street and directly to Jempsons. Not knowing the surface of this, scope to improve the surface should be explored to improve connectivity for active travel potential.

- 1.19 **PEA01 Oaklands – 10 dwellings.** The proposal at Pippins (adjacent to this site) for 29 dwellings was accepted by the Highway Authority, though it is understood that the planning application has been subsequently withdrawn. If Pippins came forward again, this site could have a vehicular connection through and utilise the access provision that was supported onto the A268 at the position of Pippins. It is not clear from the sites plan map 7.1 where the access is anticipated to be otherwise to provide any meaningful comments.
- 1.20 **PM03 Old Football Ground** - See comments for Oaklands. Though it is noted that land ownership extends to Tanhouse Lane where there may be scope to access the site, though requiring some Jempsons land (southern corner adjacent to the footpath 18b), and some minor widening at Tanhouse Lane to incorporate suitable carriageway and footway for access.
- 1.21 To summarise, the sites collectively have accessibility challenges in terms of delivery of a suitable access for vehicles and providing for non-motorised routes and infrastructure to support all users to reach local services and public transport. We would strongly suggest that the matters that we raise are considered and addressed prior to the next iteration of the Neighbourhood Plan being prepared.

2. Lead Local Flood Authority

- 2.1 Policy I4: Sewage System Improvements. (page 29). It is not clear on what is meant by independent capacity checks, whether this means independent from the developer or Southern Water.
- 2.2 It is noted at page 29. *'Indeed, it is surprising that SW has some responsibility in the village as shown in Map 4.2.'* We are not clear on why this is surprising.
- 2.3 Definitions of flood risk in the parish are set out at page 29;

'Most of the parish is classified as being in Flood Zone 1 [1:1000 year chance of flooding or better] with very little in Flood Zone 2 [no worse than 1:100 year chance] and relatively small amounts – on the banks of the Rother and the Tillingham – in Flood Zone 3 [greater than 1:100 year chance].'

The representation of various flood zone classifications is less than precise, for example '1:1000 year chance of flooding or better' is not the standard expression of risk. The standard definitions are:

- Zone 1 Low Probability - Land having a less than 0.1% annual probability of river or sea flooding. (Shown as 'clear' on the Flood Map for Planning – all land outside Zones 2, 3a and 3b)
- Zone 2 Medium Probability - Land having between a 1% and 0.1% annual probability of river flooding; or land having between a 0.5% and 0.1% annual probability of sea flooding.

- Zone 3a High Probability Land having a 1% or greater annual probability of river flooding; or Land having a 0.5% or greater annual probability of sea.
- Zone 3b The Functional Floodplain - This zone comprises land where water from rivers or the sea has to flow or be stored in times of flood. The identification of functional floodplain should take account of local circumstances and not be defined solely on rigid probability parameters. Functional floodplain will normally comprise:
 - land having a 3.3% or greater annual probability of flooding, with any existing flood risk management infrastructure operating effectively; or
 - land that is designed to flood (such as a flood attenuation scheme), even if it would only flood in more extreme events (such as 0.1% annual probability of flooding).

2.4 It should be noted that Zone 1 is not risk free as it does not include surface water, ordinary watercourse, or groundwater flood risk. The absence of these 'localised' forms of flooding are also evident in the remaining risk zones (2, 3, 3a and 3b).

2.5 Page 30 of the draft Plan explains:

'Surface water flooding for all of East Sussex is coordinated by a flood management team in the ESCC environment department which is the designated 'Lead Local Flood Authority'.

This sentence would be better rephrased to more accurately represent the LLFA's role . The wording of the proposed text suggests that we coordinate surface water flooding, rather than coordinating the management of surface water flood risk.

Moreover, the sentence is incomplete. *We suggest :*

Surface water, groundwater and ordinary watercourse flood risk in East Sussex is managed by ESCC in its role as the Lead Local Flood Authority.

2.6 The Neighbourhood Plan notes also at page 30;

'ESCC observes that much information is not readily available and historical records may be needed to identify old springs and similar.'

A minor change to this sentence is suggested:

ESCC observes that much information is not readily available, has been lost in preceding years or has yet to be developed and historical records may be needed to identify old springs and similar.

3. Education

- 3.1 We note that the Parish Council would support the expansion of Peasmarsh CE Primary School, were it necessary. We also note that they would like to see sixth form provision added to either Rye College or Robertsbridge Community College. Our pupils forecasts take account of the latest housing completions and trajectory information for the area provided by Rother District Council earlier this year. On this basis, we have no particular comments to make at this stage.

4. Culture and Tourism

- 4.1 Any future sustainable tourism planning should take into account environmental sustainability. Therefore, new tourism infrastructure should include the consideration of Active Travel and EV ChargePoint's at the earliest stage.

5. Public Health

- 5.1 It is acknowledged that many of the policies within the Plan will have possible benefits on health and wellbeing however this has not been fully acknowledged or developed in the Plan. The Plan needs to recognise the need to protect and improve the health and wellbeing of its population in order to reduce health inequalities and create opportunities for creating health equity and prosperity as well as healthy and sustainable places. The following comments therefore highlight the links and areas where health and wellbeing benefits in the plan can be strengthened. A useful reference document is the Town and Country Planning Association's 'Reuniting Health with Planning in promoting health communities' that can be found in this link: https://tcpa.org.uk/wp-content/uploads/2021/11/TCPA_5-Years-of-Health.pdf

Vision and Objectives

- 5.2 The vision and objectives section should integrate health and wellbeing issues more holistically and comprehensively, including active travel, social cohesion through better connectivity (connected neighbourhoods) and improved facilities and access to nature.
- 5.3 The following red text in bold is suggested within the Vision: "Peasmarsh parish will continue developing its thriving, **healthy**, safe and friendly rural, community through sustainable development. The Plan will reflect the needs of and enhance / improve the significant environmental assets of the parish whilst developing its economic viability, **maintaining and improving health and wellbeing**, and its rural surrounding. It will also respect our location in the High Weald Area of Outstanding Natural Beauty."
- 5.4 It is recommended the following points be incorporated within the Objectives:
- maintain and improve access to nature and to play and recreation increasing physical activity and providing health and wellbeing benefits such as positive mental health.
 - maintain and improve social cohesion and reduce social isolation and loneliness.

- food security, access to healthy food, and growing spaces
- lifetime and adaptable homes
- maximising opportunities for healthy design principles
- active travel
- healthy lifestyles and mental health

- 5.5 **2.8 Population and Housing;** It is suggested that health intelligence data on population demographics is used to expand on health inequalities in order to see trends and key issues in the parish. For example a breakdown of population by all ages in a table, and using the 2011 Census (or 2021 when available) and to set out the proportions of the population in good or bad health, that can be compared with the District and nationally to build up the profile of the health of parish residents. Please also refer to area profile on the East Sussex in Figures website for Peasmarsch: <https://www.eastsussexinfigures.org.uk/webview/index.jsp?mode=area&submode=result&areaname=Peasmarsch&areatype=PA> Please also see this link for 2021 Census data: <https://census.gov.uk/>
- 5.6 **3. Landscape, the Environment and Heritage, 3.1 Introduction;** The section should expand on the benefits to health and wellbeing from the environment. It should acknowledge the potential benefits of increasing physical activity for all ages and abilities through active travel, recreation and play, connected neighbourhoods, also the mental and wellbeing benefits associated with access to nature and quality built and historic environments.
- 5.7 **3.4 Locally significant views;** The policy justification could include the mental health and wellbeing benefits of protecting locally significant views.
- 5.8 **3.6 Health and Wellbeing;** The section should expand on the health and wellbeing benefits of people's access to nature by stating that it will increase physical activity leading to both physical and mental benefits. It is suggested that the first paragraph in section 4.4.1 regarding supporting healthy lifestyles is more appropriate within this section. Section 4.4.1 appears to be mainly focused on health services and access to them, whereas this section refers to influencing the wider determinants of health and wellbeing with access to green infrastructure, food growing and physical activity including through recreation and play.
- The safeguarding of the allotments is welcomed. They provide benefits not only healthy food but bring people together improving physical and mental wellbeing providing a source of recreation and wider contributions to green and open space.
- 5.9 **8 Design and the Built Environment, 8.1 Introduction;** The text should refer to the health and wellbeing benefits of good neighbourhood design both physical and mental. Detailed objectives should include measures to reduce social isolation, support healthy lifestyles and improve social cohesion by providing places for people to meet. Cross referencing to 'Policy L2 : Protection of Locally Significant Views' to increase public viewpoints over landscape is suggested, and this could refer to the

mental wellbeing benefits, seating and places to meet at such sites would strengthen community social cohesion.

- 5.10 **8.4.3 New homes**; We acknowledge the reference to HAPPI principles and the Lifetime Homes standard, and due to the older and aging population reference should also be included to the guidance by RTPI - **Dementia & Town Planning, RTPI 2020**. Also to reflect older people's needs especially in relation to dementia reference in the supporting text could be made to the East Sussex Dementia Joint Strategic Needs Assessment [Dementia JSNA \(eastsussexjsna.org.uk\)](http://eastsussexjsna.org.uk).



Historic England

Peasmarsh Neighbourhood Development Plan
Memorial Hall
Main Street
Peasmarsh TN31 6YA

Our ref: PL00791550

contact@PeasmarshNDP.uk

by email only

14 November 2022

To whom it may concern:

Ref: Peasmarsh Neighbourhood Plan Regulation 14 Consultation

Thank you for inviting Historic England to comment on the Regulation 14 Pre-Submission Draft of the Peasmarsh Neighbourhood Development Plan 2021-39.

Neighbourhood Plans are an important opportunity for local communities to set the agenda for their places, setting out what is important and why about different aspects of their parish or other area within the neighbourhood area boundary, and providing clear policy and guidance to readers – be they interested members of the public, planners or developers – regarding how the place should develop over the course of the plan period.

Paragraph 190 of the [National Planning Policy Framework](#) (2021) sets out that Plans, including Neighbourhood Plans, should set out a positive strategy for the conservation and enjoyment of the historic environment. In particular, this strategy needs to take into account the desirability of sustaining and enhancing the significance of all types of heritage asset where possible, the need for new development to make a positive contribution to local character and distinctiveness; and ensure that it considers opportunities to use the existing historic environment to help reinforce this character of a place.

It is important that, as a minimum, the strategy you put together for your area safeguards those elements of your neighbourhood area that contribute to the significance of those assets. This will ensure that they can be enjoyed by future generations of the area and make sure your plan is in line with the requirements of national planning policy, as found in the National Planning Policy Framework.

We are pleased to see that protecting the character and heritage assets of Peasmarsh is one of the Objectives of the Plan. This objective will guide the delivery of heritage policies included in the Plan and will ensure that they are robustly justified.

We support the intent of Section 3 and Section 8 of the Plan to ensure that consideration is given to the impact on local heritage assets. However, it is not clear what these heritage assets are and how they have been selected. The preparation of a local heritage list would be an excellent community project to add to the evidence base for the Plan. We



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk



recommend that the formal identification of such non-designated heritage assets is informed by testing against criteria set locally and a brief examination of each site's heritage interest in order to ensure they merit consideration in planning and to inform future decisions to sustain or enhance their significance. National Planning Practice Guidance states that "... where it is relevant, neighbourhood plans need to include enough information about local heritage to guide decisions and put broader strategic heritage policies from the local plan into action at a neighbourhood scale. ... In addition, and where relevant, neighbourhood plans need to include enough information about local non-designated heritage assets including sites of archaeological interest to guide decisions". The list should also include any sites of interest recorded on the East Sussex Historic Environment Record (HER).

We note that Policy L1 refers to the protection of heritage asset settings. We suggest that the scope of this Policy should be expanded to include the conservation and, where possible, enhancement, of designated and non-designated heritage assets as well as their settings.

We welcome the consideration given to a set of locally significant views and we support the intent of Policy L2 to promote development that safeguards these views. Whilst the views have been illustrated, we strongly recommend providing a more detailed description of the features that are considered to contribute positively to the character of each view and that merit its consideration in planning to inform implementation of the policy (ideally as an appendix to the Plan). Otherwise, the Plan may not provide the certainty for decision-making that the Parish Council and community want to see.

We note that the Plan intends to allocate four sites for development, with further two sites nominated as potential development sites over the life of the Plan, and that the development boundary has been redefined to include the sites allocated for development. We also note that the Strategic Environmental Assessment has identified potential negative effects to designated heritage assets for two of the allocated sites (PM01 Flackley Ash and PM02 Woodside), and uncertain effects for sites PM04 Orchard Way and PEA01 Oaklands.

Where a potential site allocation affects a designated heritage asset, such as a listed building or conservation area (including effects for its setting), the impact of those effects should be considered in terms of any harm or benefit that could be provided to their significance, including but not limited to the significance that justifies their designation. Planning authorities should endeavour to ensure that they have sought to avoid or minimise conflict between the need to conserve heritage assets and any aspects of a proposal (such as a development). Where possible harm cannot be avoided within a development proposal, the possible benefits of the scheme will need to be weighed against the negative outcome or 'harm' that results to determine whether the development is justifiable. The NPPF is clear that "great weight" should be given to the need to conserve designated heritage assets.

Where a site allocation could have effects for a heritage asset that is otherwise protected through national and local planning policy there is a potential conflict that reduces clarity for decision makers. In such circumstances it is necessary to provide guidance within the



policy about how this conflict should be managed to avoid or minimise that harm and to ensure the benefits that are considered to justify residual harm are secured. We strongly recommend discussing the potential impact of the sites' development on the affected listed buildings with the District Council's conservation adviser in order to develop a better understanding of the potential impacts and either include a more specific requirement that addresses those impacts by guiding the design of development, or consider whether the allocation is suitable in principle.

We welcome the inclusion of the Peasmarsh Villagescape and Design Codes in the evidence base of the Plan as providing the required "understanding and evaluation of each area's defining characteristics" (NPPF, paragraph 127). We are pleased to see that this document has been specifically referenced within Policies D1, D2 and D3.

For further general guidance we would refer you to our published advice on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>.

For further specific advice regarding the historic environment and how to integrate it into your neighbourhood plan, we recommend that you consult your local authority's planning and conservation advisers, and if appropriate the East Sussex Historic Environment Record at <https://www.eastsussex.gov.uk/environment/archaeology/her>.

To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

If you have any queries or would like to discuss anything further, please do not hesitate to contact me.

Yours faithfully,

Bozhana Pawlus, MSc, BA (Hons.)
Business Officer, London & South East
Historic England, 4th Floor, Cannon Bridge House,
25 Dowgate Hill, London, EC4R 2YA
Bozhana.Pawlus@HistoricEngland.org.uk

Checked by:
Louise Dandy Grad.Dipl. Cons (AA) FRSA
Historic Places Adviser, Historic England, London & South East

Consultation: Peasmarsh Neighbourhood Development Plan: Notification of Formal Public Consultation [Regulation 14 Neighbourhood Planning Regulations 2012]

National Highways Reference: Tracker #18299; (JSJV SB553)

Dear Sir/Madam,

Thank you for your notification of 31 October 2022, inviting National Highways to comment on the Peasmarsh Neighbourhood Development Plan Regulation 14 Consultation by 12 December 2022.

National Highways has appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with plans, proposals and policies that have the potential to impact on the safe and efficient operation of the SRN. In the case of the Peasmarsh Neighbourhood Plan, our focus will be on any potential impact to the A259.

We note your Neighbourhood Plan sets out that up to 52 homes may be delivered, and we are aware of the residual requirement arising from the current Rother Development and Site Allocations Local Plan. We would welcome further information about Policy E1 'New Business Space Development', particularly development quanta, so that we can consider whether there would be any material implications for the SRN.

Please continue to consult us as the Plan progresses so that we can remain aware of, and comment as required on, its contents. If you have any queries regarding this response, please contact us via PlanningSE@nationalhighways.co.uk.

Kind regards

Elizabeth Cleaver, Assistant Spatial Planning Manager

National Highways | Bridge House | 1 Walnut Tree Close | Guildford | Surrey | GU1 4LZ



Central Square South
Orchard Street
Newcastle upon Tyne
NE1 3AZ

T: +44 (0)191 261 2361
F: +44 (0)191 269 0076

avisonyoung.co.uk

Our Ref: MV/15B901605

12 December 2022



Peasmarsh Parish Council
contact@PeasmarshNDP.uk
via email only

Dear Sir / Madam

**Peasmarsh Neighbourhood Plan Regulation 14 Consultation
October – December 2022
Representations on behalf of National Grid**

National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

Proposed development sites crossed or in close proximity to National Grid assets:

Following a review of the above document we have identified the following National Grid assets as falling within the Neighbourhood area boundary:

Electricity Transmission

Asset Description

4Z] ROUTE TWR (006 - 134): 400Kv Overhead Transmission Line route: DUNGENESS - NINFIELD 1

A plan showing details of National Grid's assets is attached to this letter. Please note that this plan is illustrative only.

National Grid also provides information in relation to its assets at the website below.

- www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/

Please see attached information outlining guidance on development close to National Grid infrastructure.

Distribution Networks

Information regarding the electricity distribution network is available at the website below:
www.energynetworks.org.uk

Information regarding the gas distribution network is available by contacting:
plantprotection@cadentgas.com

Further Advice

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets.

We would be grateful if you could add our details shown below to your consultation database, if they are not already included:

Matt Verlander, Director

nationalgrid.uk@avisonyoung.com

Avison Young
Central Square South
Orchard Street
Newcastle upon Tyne
NE1 3AZ

Spencer Jefferies, Town Planner

box.landandacquisitions@nationalgrid.com

National Grid
National Grid House
Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,



Matt Verlander MRTPI

Director

0191 269 0094

matt.verlander@avisonyoung.com

For and on behalf of Avison Young

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Electricity assets

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's '*Guidelines for Development near pylons and high voltage overhead power lines*' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their '*Guidelines when working near National Grid Electricity Transmission assets*', which can be downloaded here: www.nationalgridet.com/network-and-assets/working-near-our-assets

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

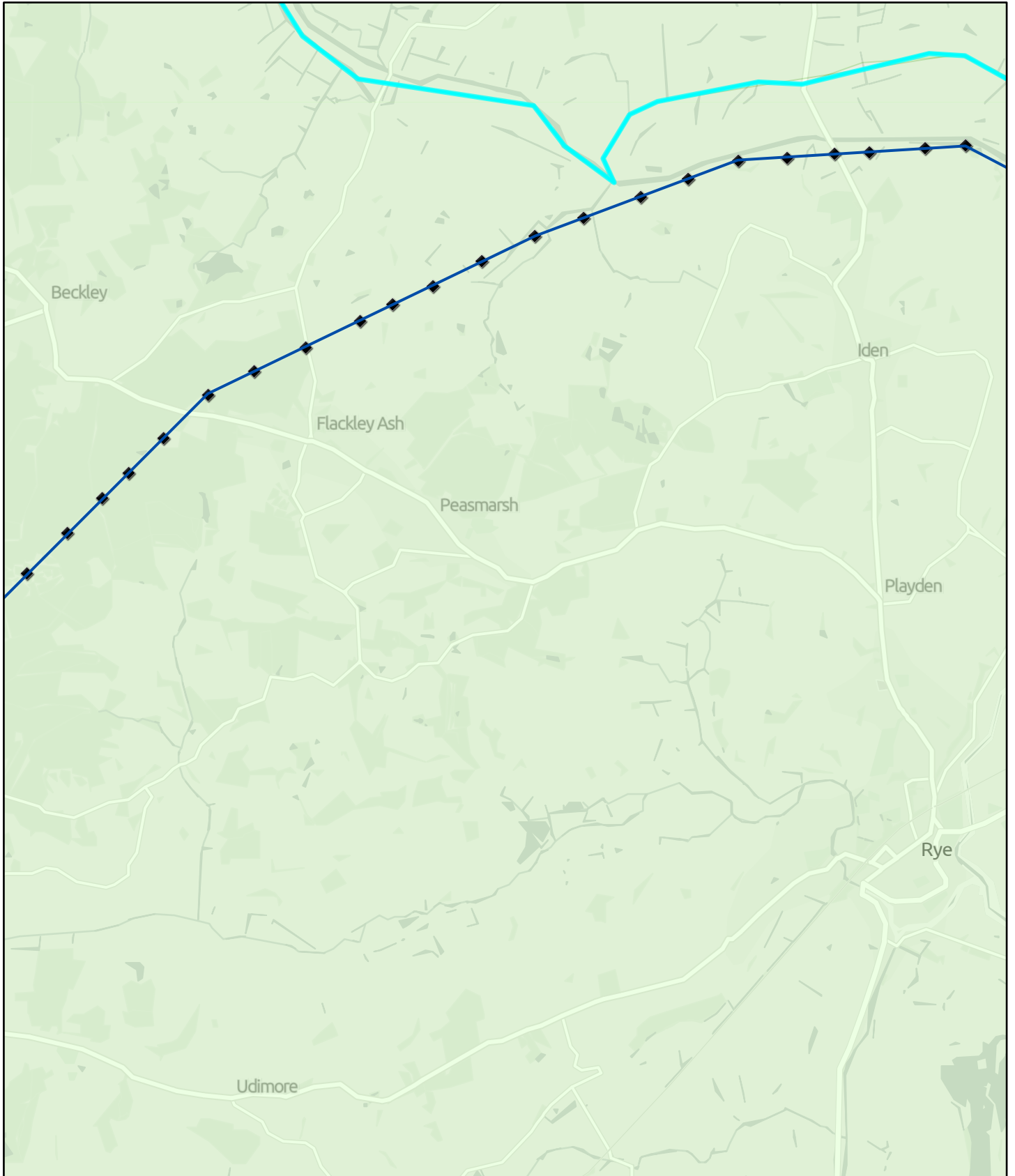
National Grid's '*Guidelines when working near National Grid Gas assets*' can be downloaded here: www.nationalgridgas.com/land-and-assets/working-near-our-assets

How to contact National Grid

If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: nationalgrid.uk@avisonyoung.com

Peasmarsh Neighbourhood Plan Regulation 14 Consultation Asset Map



12/12/2022, 11:36:17

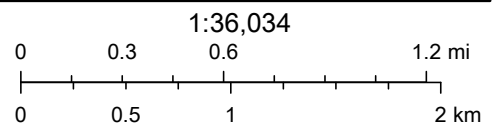
Electric_Assets_4020

— 400

◆ Electric_Assets_1587

Development_Plan_Monitoring_v2_977_5701

Development_Plan_Monitoring_v2_977



Contains OS data © Crown Copyright and database right 2022
Contains data from OS Zoomstack

Peasmarsh Parish Council

By Email (& partial response via the online form)

Date
08 December 2022

Contact
planning.policy@southernwater.co.uk

Your ref

Our ref

Date
08 December 2022

Dear Sir/Madam,

Peasmarsh Pre Submission Neighbourhood Development Plan

Thank you for consulting Southern Water on the Pre-Submission version of the Peasmarsh Neighbourhood Plan. Southern Water is the statutory wastewater undertaker for your neighbourhood.

We were unable to submit all of our comments using the online form, and therefore attach our full response to this letter. In particular the feedback we provide in response to Policy L1 'Recording of Infrastructure Issues' includes related requests for corrections that we could not submit via the online form. Please do not hesitate to contact me further should you have any queries regarding our response.

We hope that you find our response useful and look forward to being kept informed of progress.

Yours faithfully,

Catherine Adamson

Catherine Adamson
Strategic Planning Lead for Kent and East Sussex

Policy L6: Protection of Local Green Space

Southern Water understands the desire to protect local green spaces. However, we cannot support the current wording of the above policy as it could create a barrier to statutory utility providers, such as Southern Water, from delivering essential infrastructure required to serve existing and planned development.

The National Planning Policy Framework (NPPF) (2021) sets out the intention to protect the countryside, for which it establishes:

- The intention in paragraph 147 of ruling out inappropriate development 'except in very special circumstances'.
- In paragraph 148 that special circumstances exist if the potential harm of a development proposal is clearly outweighed by other considerations.
- In paragraph 150 that 'certain other forms of development are also not inappropriate' including 'engineering operations'.

Southern Water considers that should the need arise, special circumstances exist in relation to the provision of essential wastewater infrastructure required to serve new and existing customers. This is because there can be limited options available with regard to location, as the infrastructure would need to connect into existing networks. Planning policies should therefore support proposals that come forward to deliver necessary water supply and wastewater infrastructure.

Proposed amendments

In line with the NPPF, we recommend that the wording be amended within this policy, to read (additional text underlined):

The Plan designates local green spaces as shown on Map 3.11. Development proposals within the designated local green spaces will not be supported, except in exceptional circumstances, for example where it relates to necessary utilities infrastructure and where no reasonable alternative location is available.



Policy L7: Retain and Improve Public Access

Urban creep presents an ever-increasing challenge to communities as this combines with the effects of climate change to worsen the risk of localised flooding. Support for green infrastructure is therefore important to help reduce the rate of urban creep and support the natural water cycle, in addition to its many other benefits. We therefore strongly support the following wording within this policy:

The Plan encourages green infrastructure for all developments. Green infrastructure outside of new developments will also be supported.

I1: Recording of Infrastructure Issues

Southern Water note the Parish' comments on the need to improve Parish records of problems that arise with infrastructure. We support this need to provide evidence of the drainage improvements discussed in the plan. The explanatory sections of the Plan also need to make clear the facts we have explained to the Parish however. We have therefore summarised these below for ease of reference and included some additional information that we hope will help with the submission draft of the Plan. This should in turn help to clarify data capture needs and avoid misreporting.

Summary of points explained to date:

- The public sewer maps and notation of the type of sewerage system installed were inherited from Rother District Council in 1989 when the Water Industry was privatised. The system type shown at that time is our best guide to what flows the system was designed to serve and convey. The maps show that the Peasmarsh system was intended as a foul only system. Southern Water maps show the public sewer line networks, not private sewers (that typically lie within property boundaries for example). Southern Water data indicates that we have responded to a range of calls on private networks, giving assistance to clear blockages despite having no responsibility to do so.
- Our data also indicates that the underlying cause of the majority of sewer overflows in Peasmarsh are blockages. Blockages can be caused by a range of factors, including behaviors in communities. When a block is present during a period of rainfall, it may appear that the cause is hydraulic overloading as the blockages in underground networks cannot be seen from ground level. We have asked the Parish for details of examples of the flooding described so that we might investigate, and fed back the results. If there is flooding from the public sewerage system then this needs to be reported to us through usual channels.
- We have asked for customers to contact us direct at times when they experience issues that they believe are caused by the public network. Only with this information can we investigate further, and the results of all investigations then feed into data we use to monitor and maintain the network. Southern Water can only discuss the findings from any investigation we undertake in response to these contacts to the customers concerned.
- There are some additional information links here if this helps you further:
<https://www.southernwater.co.uk/help-advice/sewers-and-drains>
- The Plan describes the naturally occurring problem of land drainage in Peasmarsh well -
 - *Geologically, Peasmarsh is at the lower end of the Wealden formation where the sandstone runs out and the underlying clay is exposed. Because the sandstone is permeable but the clay is not, there are many springs along the line between the two layers. The issue is that the clay results in much of the parish being a critical drainage area. The potential for surface water flooding is further exacerbated by the effects of climate change which seem to be trending to downpour rain events.*

AECOM consultants describe further in the Strategic Environmental Assessment –

- *Exacerbating the flood risk issue within the parish is the low-lying topography of the parish, the inadequate road drainage, and subsequent high levels of surface water run-off.*

Land and highways drainage are typically the responsibility of District and County Councils (please see our responses on policies I4 and I5 for more information). We also noticed that the last completed Strategic Flood Risk Assessment for Rother (2008) cites poor channel maintenance of private ditches as the cause of historic flooding incidents within Peasmarsh.

- We explained how, where we are consulted (we are not statutory consultees for planning applications) we undertake analysis on the impact of new developments.
- We, along with the rest of the industry, comply with obligations relating to Ofwat's Charging Rules for New Connection Services.

Having explored all concerns at length in communication with the Parish Council, investigating all concerns by interrogating data sources and speaking with internal experts, and we confirmed to the Parish that our evidence does not show the local sewer network to be hydraulically overloaded.

Proposed clarifications:

We therefore request the following changes, to clarify statements of opinion from those drawn from evidence and a full understanding of drainage responsibilities (*additional text underlined*).

P7 Draft Plan – Southern Water advised ~~considers~~ the original design of the system.

P19 Draft Plan – ~~this threat to human health and the environment is a direct result of the responsible company not calculating system capacity on the basis of a combined sewer [both foul and surface water] even though it knows and accepts that to be the case because the older houses in Peasmarsh village have combined discharges a concern directly resulting from the drainage concerns~~ This is discussed in more detail in Section 4.3.5 and a policy [14] is proposed ~~established.~~

P23 Section 4.3.1 Draft Plan – Peasmarsh is very much in need of infrastructure improvements, particularly in connection with ~~both foul and~~ surface water drainage

P27 on the areas Iden WTW serves

SW states ~~that the Iden works treat sewage from Rye [presumably part of] Iden, Peasmarsh, Playden, Camber and Rye Foreign. Bowlers Town and Houghton Green. The village Peasmarsh pumping station is on the site of the old Peasmarsh wastewater treatment plant.~~

P27 Section 4.3.5 Draft Plan

~~There are~~ The Parish is concerned with two primary issues in respect of foul water disposal and a third important one:

- The limited sewer network
- The capacity of the system
- The power supply to the pumping station.

P27 Section Limited Network Draft Plan

Map 4.2 [over] shows the main extent of the sewer network in Peasmarsh village together with the surface water drains under SW ownership. ~~The company states that it doesn't know all of the details of its network which is why there are some parts of the network not connected to the pumping station.~~ Southern Water maps show the public sewer line networks, not private sewers (that typically lie within property boundaries for example). The public sewerage system is also more extensive than shown on water company sewer maps due to the transfer of a large number of formerly private sewers into public ownership in 2011 (for more information please see <https://www.southernwater.co.uk/help-advice/sewers-and-drains/transfer-of-private-sewers>. Additionally, the map does not show any private connections to the sewers.

~~It can be seen~~ Southern Water maps indicate that whilst most of the eastern end of the village is connected to the main sewer network has the possibility of a sewer connection, which The network extends to the western end is not well served: the sewer does not even reach all of the bend in School Lane and stops at the top of Cock Hill past the caravan site and properties close to the junction of Tanhouse Lane and on Main Street.

SW acknowledges that it has a statutory obligation to serve new development. When assessing and commenting on planning applications Southern Water will take account of performance of the public sewer network and identify where reinforcement of the system may be required to ensure there is no unacceptable reduction in the level of service as a consequence of growth. Developers typically pay a standard connection fee, more information is available here <https://www.southernwater.co.uk/help-advice/connection-charging-arrangements>

P28-29 Draft Plan –

~~The fundamental problem~~ Our concern with the sewer system capacity is that the SW calculations for growth assume that the system is for foul water only while accepting that a number fairly high percentage [there is no known data on what that might be] of homes connected to the system have combined outflows because they were built before combined systems were not permitted. surface water drainage to the system, Building Regulations having permitted connections to the foul network. With both urban creep and climate change increasing surface water run off over time this is a major driver for sustainable urban drainage systems - the design of which aims to prevent

surface water from entering sewers not designed to convey it, whilst also protecting the natural water cycle into the future.

~~One result of that incorrect assumption is that~~ The public sewer maps were developed by local authorities to show the original type of sewerage system installed. The system type is a water company's best guide to what flows the system was designed to convey. The maps show that the Peasmarsh system was intended as a foul only system. However, as development progressed Building Regulations subsequently permitted drainage connections from new impermeable surfaces to the foul network. This means that since the original construction of the drainage system, as urban creep and climate change have increased, volumes of rainwater are draining into the (intended) foul only system.

An overflow exists at the pumping station to relieve high flows arising at times of rainfall. The pumping station recorded overflow spills to the local stream 38 times for a total of 193 hours during 2021 ~~alone.~~ Southern Water is identifying the improvements required to sewerage systems in accordance with DEFRA guidance. At present there is no limit on the number of times the overflow is permitted to operate. Southern Water provides more information about storm overflows and the work it is progressing here <https://www.southernwater.co.uk/our-performance/storm-overflows>.

~~The capacity problem is not limited to the pumping station and its delivery line to Iden however. Some people experience sewage flooding in their gardens at not-infrequent intervals and instances of internal flooding occur from time to time. The company cannot ascertain whether its drains are of sufficient capacity because it would need to undertake calculations to do that. Nonetheless, the company says that data compiled from years of investigating customer contacts provides there is no evidence of under-capacity locally, even though~~ Observation in the village suggests that this is not the case. A small number of reports of local incidents have been reported to it by the Parish but in maintains across these examples investigation did not identify hydraulic overloading. Examples included blockage issues outside of its preventable control. This Drainage is a critical matter, fundamental to any new developments and must be resolved before further development is undertaken.

Risk based catchment screening is a process completed at the outset of developing a Drainage and Wastewater Management Plan. It is used to identify the sewer catchments likely to be most vulnerable to future changes, such as climate change or new development, so effort can be focused accordingly. The tabulated results of Southern Water's 2020 Baseline Risk and Vulnerability Assessment tabulate this risk comparison for the Rother catchment. ~~show a different story.~~

P29 Draft Plan – please remove the following sentence as it refers to '1990 understanding' and circumstances will have changed since. It is also not linked to any evidence source that we can review to understand how the 'planning inspectorate noted' this:

~~It is understood that as far back as 1990 the planning inspectorate noted that the local system was already close to capacity and since then many new houses have been added.~~

P29 Section 4.3.6 Draft Plan – ... There is no single organisation with direct responsibility for surface water drainage. Indeed, it is surprising that SW has some responsibility in the village as shown in Map 4.2.

And section 4.3.6 continuing on p30 –

The problem in the parish is not river flooding [an Environment Agency issue] however, it is from localised surface water flooding, primarily because of the clay base layer which means that water courses must carry away surface water. Rother District Council's last published Strategic Flood Risk Assessment (SFRA) cites the poor channel maintenance of private ditches as the cause of historic flooding incidents in Peasmarsh. An updated SFRA is also in development.

...

A guide to some of the organisations involved is on p7 of the ESCC Flood Risk Management Strategy which also has a guide to water ownership on p32.

There are also some surface water sewers in the Peasmarsh area, owned and maintained by Southern Water as shown in Map 4.2. This is not an extensive network of surface water sewers, but where these have been constructed to an adoptable standard to serve new developments, and subsequently adopted, they are shown on the public sewer map.

P64 7.5.3 PM02 Woodside

The closest point of connection will be assessed as developments come forward. However, our information indicates that the sewer main on Main Street is 80 metres from the 'Woodside' address point and just 10 metres from the southern edge of the PM02 development boundary.

PA4.3 of Appendix to the Draft Plan Foul Water Disposal –

~~Attempts by the PNDP steering group to obtain information on the foul water system from Southern Water [SW] have had only limited success with information being provided grudgingly and without detailed evidence.~~

~~In essence its view conclusion from several reviews of available data for Peasmarsh is seems to be that there are no significant problems with sewer capacity and any flooding incidents are the results of self-inflicted failures of care by their customers. This runs counter to the lived experience of the residents of the village, particularly those unfortunate enough to live in locations experiencing issues, although we acknowledge the Parish was unable to identify details of these locations and issues to allow Southern Water to investigate further. prone to foul water flooding~~

~~pA4.4 Appendix notes beneath photos – frame grabs from cell phone videos of two separate incidents. On the left overflows from sewage is erupting from close to an inspection chamber.-On the right flows sewage is gushing out with some considerable force from what appears to be a sewer line (public or private) the underground sewage main. No dates or details could be provided to allow Southern Water to investigate any history that might relate to these images.~~

As is discussed in Section 4.3.5 of the Plan, the key concerns raised by the Parish issues are:

- The limited nature of the network so that only part of the village has access to the sewage system;
- The inability of the system to cope with surface water ~~even though SW accepts that the older properties in the village may have combined systems~~

~~Please remove the next sentence of this section – as where the property drain to the in-street sewer is free flowing then there is no block on the public network that could be affecting that property. In such instances customers should make contact with a plumber or equivalent service to investigate the issues on their private home plumbing and drainage pipework.~~

~~Anecdotally, people talk of foul water backing up in their toilets – even though their drain to the in-street sewer is free flowing – and explosive events coating toilet walls with excrement.~~

~~Please remove the following passage of this section as it does not relate to sewage capacity, is not derived from a study of data for the catchment, and is presented out of context from explanations we have provided on the sewage network and broader responsibilities for surface water drainage.~~

~~There have also been informal 'chats' with SW workers when at the pumping station. It is reported that, in their view, there is no spare capacity at the station.~~

pA4.5 Appendix

Risk based catchment screening is a process completed at the outset of developing a Drainage and Wastewater Management Plan (DWMP). It's used to identify which sewer catchments are likely to be most vulnerable to future changes, such as climate change or new development, so effort can be focused accordingly. When SW undertook a Baseline Risk and Vulnerability

Assessment for the Iden wastewater treatment works in 2020, five risk criteria were found to be 'very significant' : pollution risk, storm overflow risk [2020 and still in 2050] and nutrient neutrality [2020 and still in 2050]. ~~This confirms that provides the relative significance of the risks performance of the Iden wastewater system to allow comparison with others in the Rother catchment. is potentially below the minimum threshold but there is no mention of remedial investment in SW's long term plan. Investment needs are detailed for the catchments prioritised to have the most significant risks.~~

~~It is worth noting that the water industry is normally regulated by 5 year investment programmes, in addition to developer connection fees that contribute to the cost of network growth schemes where these are required. As a result, the timing of future housing development may be impacted by the financing of any sewage system upgrades as required.~~

p18 PSA document

Inadequate ~~drainage sewage system~~

SEA references: the wording of Section 5.40 of the SEA (below) does not appear to be supported by evidence, particularly given the following sections of the SEA:

- 4.36 states neutral climate change impacts for all growth options,
- 5.59 states no cumulative impacts in respect of wastewater capacity and
- 5.43 in the Land Soil and Water Resources section, states minor effects are concluded overall).

Please update the wording of section 5.40 to: The Parish remains concerned that the ~~Local~~ evidence suggests the sewer system is at capacity.

I4: Sewage System Improvement

To re-summarise what we have explained to the Parish in past communications for ease of reference:

- The sewerage system in Peasmarsh is predominantly foul only (by original design). Building Regulations may have permitted developers to connect both surface and foul water from some homes to this network (see our feedback to policy I5 for more on more sustainable drainage).
- Southern Water is responsible for the public sewerage system, but not for land drainage or for piped drainage systems not in public ownership, for example culverted watercourses.
- Southern Water is responsible for the maintenance of the public system and extending this in accord with statutory duties. When assessing and commenting on planning applications we will take account of performance of the public sewage system and identify where reinforcement of the system may be required to ensure there is no unacceptable reduction in the level of service as a result of growth.
- The public sewerage system is more extensive than shown on water industry maps due to the transfer of a large number of formerly private sewers into public ownership. See Southern Water Website for details <https://www.southernwater.co.uk/help-advice/sewers-and-drains/transfer-of-private-sewers> Southern Water maps do not show private sewers.
- Southern Water records show most sewer flooding incidents had been caused by blockages rather than hydraulic overload. This is identified when crews are mobilized to attend reports of issues. CCTV cameras are used to identify the issue in the underground network to ensure the root cause of the problem is addressed first time. The identified cause is then captured in data Southern Water uses to study and maintain the network. This data shows Southern Water attended to clear blocks in a number of privately owned sewers for which we are not responsible.
- We have asked for customers to contact us directly at times when they experience issues. Only with this information can we investigate further. At the moment based on the available data there doesn't appear to be an issue with hydraulic overloading of the system.
- Southern Water has a statutory duty to serve new development. We have established methods to assess the impact of new developments on receipt of planning applications.

In order for the Plan to meet the Basic Conditions they must have regard for national policies and advice. Paragraph 16(d) of the National Planning Policy Framework (NPPF) 2021 states that '*Plans should: d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*' However, as it is not feasible for Southern Water to operate by following the guidance of a consultant appointed by a third party in this way, we cannot see how this policy could be interpreted by a decision maker. Also as per our explanation for the requests for correction made in our response to Policy I2, water companies are not generally responsible for surface water drainage. We therefore recommend that this policy is amended as suggested below.

Southern Water may have to provide additional wastewater infrastructure to serve new and existing customers or meet stricter environmental standards. Where this is the case, it is likely that there would be limited options with regard to location, as the infrastructure would need to connect into existing networks. Planning policies should therefore support proposals that come forward to deliver necessary wastewater infrastructure.

The NPPF (2021) paragraph 28 establishes that communities should set out detailed policies for specific areas including 'the provision of infrastructure and community facilities at a local level'. Also the National Planning Practice Guidance states that 'Adequate water and wastewater infrastructure is needed to support sustainable development'. The work planned to identify an evidence base for the infrastructure issues commented on throughout the Plan could assist development of these more detailed policies into the future.

Although the Parish Council is not the planning authority in relation to wastewater development proposals, support for essential infrastructure is required at all levels of the planning system. We could not find policy wording to support the general provision of new or improved utilities infrastructure.

Proposed amendments

In line with the above points, we recommend that the wording be amended within this policy, to read (additional text underlined):

New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community subject to other policies in the plan.

~~No developments will be supported until such time as independent capacity checks by a qualified professional have been undertaken and any improvements required are operational. This is essential due to the current identified problems of regular foul water overflow and pollution incidents in the Neighbourhood Area.~~

~~Improvements in the system will be achieved by promoting, at district, county and national level, the extension of the local network to include all of the village.~~

I5: Surface Water Drainage

We would strongly support the inclusion of SuDS in this policy.

The risk assessments completed for the Rother catchment wastewater systems as part of our Drainage and Wastewater Management Planning* show that whilst climate change is expected to have an impact on the risk of flooding in several wastewater systems, no significant risk from rainfall related flooding was identified over the Iden catchment.

* <https://www.southernwater.co.uk/dwmp/rother-catchment/problem-characterisation-rother>

Through our work with stakeholders on the Drainage and Wastewater Management Plan process, we have considered the following options to address surface water flooding:

1. Continuously upsizing the sewer network to accommodate existing and new development as well as surface water for future climates, whilst working to address the impact of CSOs by removing these from the network - all of which will require bigger treatment works to treat the greater volumes of at times highly diluted wastewater. This option would be expensive, inefficient, disruptive and unlikely to future-proof our society from evolving climate change challenges.
2. Reduce the amount of rainfall getting into the sewer system, to create more capacity for foul sewage. This is the adaptation required in urban developments and environments in order to manage surface water differently, and to respond to the impacts of climate change in a sustainable way. We will need to move away from impermeable surfaces, tiled roofs and rapid rainfall runoff, towards permeable paving, green roofs and measures to “slow the flow” at source. Making space for water in the urban environment will be critical too – green spaces, urban forests etc – will reduce the need for drainage infrastructure whilst at the same time creating places for people to access to improve their health and wellbeing.

The NPPF (2021) paragraph 161 requires that plans (after applying the sequential test to locating development sites) manage any residual flood risk by:

(c) using opportunities provided by new developments and improvements in green and other infrastructure to reduce the causes and impacts of flooding (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management).

Well-designed sustainable drainage systems help to reduce the volume of surface water entering the foul sewer system – which could help to reduce localised flooding and, in turn, help to minimise pollution events. Sustainable drainage systems will therefore be key to helping neighbourhoods respond to the impacts of climate change into the future, as acknowledged by Policy SRM2 (Water Supply and Wastewater Management) in the Rother District Council Core Strategy adopted in 2014:

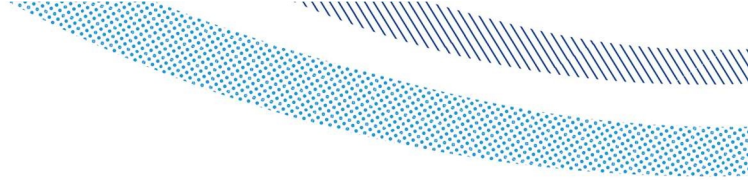
Effective management of water resources will be supported by:

(iii) The promotion of sustainable drainage systems to control the quantity and rate of runoff as well as to improve water quality wherever practicable

Since 2019, water and sewerage companies have been able to adopt certain types of SuDS. On the basis of this, and the evidence provided above, Southern Water is strongly encouraging SuDS for all development, to help reduce pressure on the existing sewer network.

More detail along with Southern Water’s criteria for SuDS adoption can be found here - <https://www.southernwater.co.uk/media/4532/suds-outline-guidance.pdf>.

Proposed amendments



To ensure consistency with the NPPF and ensure sustainable development that considers the impacts of climate change into the future, we recommend the following change to the Surface Water Drainage Policy I5 (additional text underlined):

Development will only be supported where it is demonstrated that surface water drainage will not add to existing site runoff or cause any adverse impact to neighbouring properties and the surrounding environment as required by Design Code 3.3 in Addendum D6 : Peasmarsh Villagescape and Design Codes, and all development must give priority to the use of SuDS.