

Report to	<b>Lead Cabinet Member for Transport and Environment</b>
Date	<b>27 January 2009</b>
Report By	<b>Director of Transport and Environment</b>
Title of Report	<b>Rother District Council Local Development Framework Core Strategy – Consultation on Strategy Directions</b>
Purpose of Report	<b>To determine the County Council’s response to this consultation</b>

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**RECOMMENDATIONS: The Lead Member is recommended to:**

- 1. agree the issues set out in paragraph 3.4 of this report and its appendix as the basis for the County Council’s response to this consultation document;**
  - 2. offer to work with Rother District Council, particularly on the key issues of transport, housing delivery, infrastructure and waste, in helping to refine their core strategy for submission; and**
  - 3. authorise the Director of Transport and Environment to expand upon and add to this response as necessary to safeguard the strategic interests of the County Council.**
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**1. Financial Appraisal**

1.1 There are no direct financial implications arising from the recommendations of this report. However, it is important to ensure that policies on infrastructure provision and development contributions should be included and reflect the County Council’s interests as service and infrastructure provider. Moreover, the Bexhill Hastings Link Road is essential to the success of the Core Strategy and the County Council (as promoter and applicant for this scheme) has a significant strategic and financial interest in its completion.

**2. Supporting Information**

2.1 Rother District Council has published its consultation on Strategy Directions for public consultation until 30 January 2009. Officers responded (in consultation with Lead Member for Transport and Environment) to the preceding Issues and Options stage of the Core Strategy in December 2006, and have been engaged in aspects of the Core Strategy’s development.

2.2 The County Council is a statutory consultee and has a range of stakeholder interests in the Core Strategy, including as a major service and infrastructure provider, waste and minerals planning authority, transport planning authority, landowner and as a lead advisor to the Regional Assembly on the Sussex Coast Sub Regional Strategy in the South East Plan.

**3. Comments/Appraisal**

3.1 This consultation document summarises the key challenges facing the District, describes a vision for the spatial development of the district over the period up to 2026, and establishes six key objectives which guide and inform the core strategy. The document sets out a preferred strategy governing the overall distribution of development within the District, and goes on to propose strategies covering the areas of Bexhill and Hastings Fringes, Battle, Rye and Rye Harbour, and the Rural Areas. Preferred strategies are also presented under the strategic themes of Communities, Economy, Environment, and Transport and Accessibility.

3.2 Whilst comment is invited on any aspect of the District Council's consultation document, this report concentrates on seeking to establish the principles of the County Council's views to the main strategic issues and policy directions that fall within its interests. Between writing this report and the deadline for returning comments there is time to add any further points or detail to the County Council's views in principle established here, if necessary.

3.3 The District Council has gone to great efforts to engage and involve key stakeholders when drafting this Core Strategy. This has been a resource intensive and time consuming process and the District should be congratulated for its efforts in drafting and publishing this core strategy. Officers of the County Council have provided technical advice and engaged in joint work to support and inform the core strategy's development. Consequently, much of the strategy can be supported.

3.4 However, there remain points of clarification and concern, which need to be addressed. The key points include:

- The Core Strategy should be more explicit in demonstrating how infrastructure will be provided to serve development;
- Minerals and waste policy requirements are not sufficiently developed within the Core Strategy;
- A number of detailed amendments are required to reflect accurately the current provision of education in the District and the demands that the Core Strategy will make upon education infrastructure;
- Clarification is sought on the actual level of housing development being planned for and how uncertainty associated with the Hastings Fringe sites can be managed;
- Although the Core Strategy explains the policy imperative of regenerating the communities and economy of this part of the Sussex Coast sub region, its relationship with the work of Hastings Bexhill Taskforce and Sea Space should be brought into sharper focus; and,
- The County Council would wish to be consulted on subsequent work informing the choice of a preferred approach towards affordable housing in the District.

#### **4. Conclusion and Reason for Recommendation**

4.1 The publication of this draft core strategy is a key step in providing an up to date planning framework for Rother District looking towards 2026. The summary of issues provided above is elaborated upon in the appendix. However, further detailed work is required to refine the core strategy prior to its adoption and to inform subsequent development plan documents (DPD), such as the Housing Allocations DPD. The County Council welcomes the opportunity to continue to work collaboratively with the District Council as it refines the core strategy and prepares its DPDs.

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19 January 2009

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#### **BACKGROUND DOCUMENTS**

None

## **ROTHER DISTRICT COUNCIL LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY – CONSULTATION ON STRATEGY DIRECTIONS EAST SUSSEX COUNTY COUNCIL VIEWS**

### **BACKGROUND**

1. This document represents a further statutory step towards the adoption of a core strategy as part of the Local Development Framework process for Rother District. The deadline for comments is 16:30 on Friday 30 January 2009.
2. A copy of the document is available on the District Council's website:  
  
<http://www.rother.gov.uk/index.cfm?articleid=2582>
3. This consultation document:
  - Provides an overview of the local development framework process and the role of the core strategy within it;
  - Contains a spatial portrait of the district outlining key statistics;
  - Identifies key trends and issues for the district to address;
  - Proposes a vision describing what the District may be like in 2026;
  - Establishes the aim and objectives for the Core Strategy highlighting the priorities for determining the pattern of development;
  - Explains the basis for the preferred strategy for overall spatial development; and
  - Sets out the council's preferred strategy options in terms of;
    - i. Bexhill and the Hastings Fringes;
    - ii. Battle;
    - iii. Rye and Rye Harbour;
    - iv. The Rural Areas; and
    - v. Thematic strategies, including communities, economy and environment.

### **PART I INTRODUCTION, CONTEXT AND VISION**

4. This draft Core Strategy is the second stage in the preparation of a core strategy for Rother District. It follows an 'Issues and Options' consultation held between October and December 2006, which generated some 460 responses. An ESCC officer response, in consultation with Lead Member for Transport and Environment, was submitted in December 2006.
5. The role of the Core Strategy is explained as being pivotal in delivering the objectives and local priorities set out in the Sustainable Community Strategy, and sets the Council's vision, aims and objectives for the future pattern of development in the district up to 2026. As part of its development the draft Core Strategy has been guided by a sustainability appraisal, a report on which accompanies this consultation document.

#### **Spatial Portrait**

6. A spatial portrait is presented to give an overview of the key issues, trends, constraints, and opportunities present in the district, which collectively form the context for the development of the core strategy and its preferred spatial options.

#### Comment

7. *The key statistics for the Rother are brought into relief in this section. However, what is not apparent is their collective impact as little analysis is made, and whilst issues are identified no narrative is provided on what this means for the communities and environment*

*of Rother District. For example, although Rother is a predominantly rural district, there is no examination of the relationships between urban and rural areas and how the key issues and trends and drivers for change identified may affect these relationships.*

## **Vision For The Future**

8. A Vision Statement is set out and describes how Rother may change over the coming twenty years.

### Comment

9. *A great deal of this Vision is generic and could be used by any planning authority in the south east with little alteration. However, a shared vision for Bexhill and Hastings is provided later in the document which represents a set of objectives and vision for the two towns which has been agreed by both authorities. This example of cross border working is welcome and articulates the ambition of both authorities to address the pressing social and economic challenges facing the area.*

## **Policy Context**

10. The consultation document explains that the core strategy must be in line with the Regional Spatial Strategy (Regional Planning Guidance for the South East – RPG9 – soon to be replaced by the South East Plan - SEP) and accord with the requirements of national planning policy. It should also pay due regard to the plans and strategies prepared by other bodies which provide the overall policy context for spatial planning in the district.

### Comment

11. *It is clear that in the preparation of this draft Core Strategy Rother District officers have considered a wide range of policy influences and requirements. However, the Core Strategy must be in general conformity with RPG9 (the Regional Spatial Strategy, and as such is part of the development plan); it is not merely advice as paragraph 4.4 states.*

12. *RPG9 will be replaced in the near future by the South East Plan (SEP), and the Core Strategy quite rightly notes its draft provisions, particularly the Sussex Coast sub regional strategy which provides the strategic response to the area's poor socio – economic conditions.*

13. *The East Sussex and Brighton and Hove Waste and Minerals Local Plans are referred to in the section entitled other strategies and plans. Although mention is made of these plans being part of the “development plan” and as such a material consideration in planning decisions, the draft strategy fails to provide adequate expression to their policies and objectives in subsequent sections of the core strategy. Instead the core strategy states that the waste and minerals policies should be read in conjunction with it.*

14. *It is, however, essential that the Local Development Frameworks of local planning authorities reflect and assist in the implementation of waste and minerals policies. As RPG9 (waste and minerals) states:*

*“10.247 The spatial planning system at local level has a key role in delivering change to meet recovery and landfill targets and in securing the development of new facilities. Regional Spatial Strategy must be taken into account by local planning authorities in preparing their Development Documents.”*

15. *It is clear that minerals and waste policy prepared at a regional and county level should not only be read alongside this draft core strategy, but also should inform and influence the policies and strategy which are promoted in this draft document. There is,*

*however, little evidence of this and detailed amendments will be necessary to accurately reflect the minerals and waste policy framework.*

## **PART II SPATIAL STRATEGY**

### **Overall Spatial Development Strategy**

16. Following the core strategy's depiction of issues trends and characteristics of the district a discussion follows on the needs of the District and the options available to address them. The key points raised include:

- Housing – 5600 dwellings to be delivered over the 2006 – 26 period, 4,000 to be developed in the Sussex coast sub region part of the district, with the remainder to be distributed in the rural area.
- Employment – the draft South East Plan requires the Sussex coast sub region to deliver 30, 000 new jobs between 2006 and 2016. The District Council along with Hastings borough Council has undertaken an employment land review which has concluded that 100 000 sqm of additional business floor space will be needed in Rother.
- Infrastructure Availability – the strategy rightly emphasises the need to ensure that the requisite infrastructure or the clear prospect of it is a critical consideration in determining the acceptability of development. Key strategic infrastructure improvements necessary for the Bexhill Hastings area are outlined; these include the Bexhill Hastings Link Road (BHLR) and the Baldslow improvement.
- Environment – describing the national and international environmental designations constraining development in the district.

17. Five options for the distribution of development taking are presented, their relative merits and demerits assessed and a final preferred option selected.

18. The options are:

- Option 1 Population Based – apportioning growth relative to current populations in each settlement. It maintains the existing settlement pattern with Bexhill accommodating half the development needs, but a relatively high proportion of development would be directed to the rural areas.
- Option 2 Service Centres – growth distributed according the range of services available in each settlement. The focus of development would be Bexhill, but questions arise over the ability of the town (as well as Battle and Rye) to expand.
- Option 3 Trend Based – development is apportioned according to recent housing development activity, effectively a market trend option. Once again the rural areas would receive a higher proportion of development than is considered appropriate given environmental and policy constraints.
- Option 4 Commitment Led – this essentially projects what is already planned for in the local plan over the twenty year period. This results in particular difficulties for Battle as it would be the focus of a relatively high level of housing beyond what its rural service centre role would suggest.
- Option 5 Housing needs based – this option emphasises the needs in Battle and Rye. Rye in particular, under this option, would need to accommodate significant

levels of development relative to its size. This would pose difficulties given limited employment opportunities and a range of environmental constraints.

19. Option 2, emphasising the role of service centres, is presented as the preferred option for the distribution of development within the district.

20. The strategy sets out the scale and broad locations for housing, employment and retail development, this is replicated below.

	Approximate development levels 2006-2026		
	Housing	Employment	Retail
	(Subject to detailed investigation of potential sites)	(Subject to ensuring broad distribution of job opportunities)	(Subject to site and, where appropriate, retail impact, assessments)
<b>Bexhill</b>	3,100 - 3,300 dwellings, including a further planned urban extension to the north of the town	60,000sq.m.	Convenience goods (2,500sqm sales) and comparison floorspace (4,000sqm sales) to strengthen town centre role
<b>Hastings fringes</b>	200 – 450 dwellings in association with development in Hastings	10,000sq.m.	N/A (not proposed other than local needs of development)
<b>Battle</b>	450-500 dwellings	10,000sq.m.*	Convenience floorspace (1,000sqm sales) to retain more local trade
<b>Rye</b>	450 dwellings	10,000-20,000 sq.m.	Convenience goods (1,650sqm sales) and some comparison floorspace to retain more local trade
<b>Villages</b>	1,300 dwellings	10,000sq.m.	To meet local needs
<b>Total</b>	5,600 -5,850 dwellings	100,000sq.m. (most in the first 10 years)	5,000sqm convenience sales floorspace

(\* includes sites on Marley Lane)

21. This broad distribution recognises the strengths and weaknesses of Rother's settlements, respects the environmental constraints in the district, and accords generally with the requirements of the draft South East Plan. It is explained that the range of 5600 – 5850 represents a combination of the South East Plan minimum requirement for Rother District and the range of opportunities in Bexhill and Battle. It should be noted that the above table does not sum correctly, this issue is discussed in later in this report.

22. As the draft strategy explains, development of the order and distribution described above will be dependent upon the successful and timely completion of the BHLR. Without it is unlikely that the proposed development strategy will come to fruition.

23. It is necessary for the Core strategy to consider the implications of a delay in the delivery of the BHLR, or indeed the prospect of it not being delivered at all, for the development strategy.

24. Four options are considered;

- draw on other sites earlier than expected;
- allocate additional sites elsewhere;
- plan for a variable rate of development with low rates at the beginning of the plan period and increased rates making up for the lower rates later in the plan period; or,
- planning for a lower rate of development than that set out in the South East Plan.

25. The District Council concludes that no one specific option can realistically provide a contingency for the area and that elements of all four will need to be drawn upon in the event of the BHLR being significantly delayed or cancelled. In addition it is proposed that the Core Strategy would be subject to an early review if the link road is likely to open after April 2016 and housing and employment development is expected to be 30% less than that projected for 2016.

26. Finally, the issue of infrastructure and implementation is touched upon briefly, stating that infrastructure delivery will be dealt with either by location or theme within the proposed core strategy.

### Comment

27. *I am concerned that the provision of infrastructure and its relationship with the development strategy is not considered to be significant enough to warrant its own Theme within this document. The approach taken by the draft Core Strategy is one which attempts to identify principal infrastructure requirements under locational and thematic headings, this does not, however, provide a flexible and robust strategy to securing infrastructure to support development.*

28. *It would be appropriate for the document to be amended and rationalised to include a new Infrastructure Theme within which the preferred strategy for Transport and Accessibility would sit, along with a new preferred strategy for Service Infrastructure other than Transport and Accessibility. Furthermore, the strategy should better reflect the objectives of regional policy by referring to the need to make better use of existing infrastructure.*

### **Bexhill and Hastings Fringes**

29. The aim, objectives, shared vision and preferred strategy for Bexhill and the Hastings Fringes are set out in this chapter. The need for joint working between the District and Borough Councils is emphasised as are the enhancements and improvements to Bexhill necessary to improve the quality of life of residents and to attract new businesses. Growth options considered are: development at North East Bexhill, North of Bexhill, and West of Bexhill.

30. Development at North East Bexhill is a longstanding commitment, having been tested at the inquiry into the current local plan, and is intimately related to the completion of the BHLR. Therefore, its inclusion in this consultation document is to be expected.

31. To accommodate additional growth in Bexhill over the coming decades, it will be necessary to release land for a further urban extension. The choice is presented between North and West Bexhill. Development at West Bexhill would require significant investment in transport infrastructure and the area is in close proximity to more vulnerable environments. This contrasts with North Bexhill which would be better connected to the existing and planned highway network. Consequently, North Bexhill, which is in essence an extension of North East Bexhill with the potential to extend across the A269 at Lunsford Cross, is the preferred location for strategic growth in the medium to long term.

32. The Core Strategy identifies two areas for development on the fringes of Hastings. The Wilting area, in close proximity to Queensway on the western side of Hastings, is identified for development comprising some 200 dwellings and 10, 000 sqm of employment floorspace in association with Hastings Borough Council; this would be dependent upon provision of a new railway station at Wilting.

33. A similar amount of housing development is considered appropriate south of Battle Road (Breadsell Lane) as an integral part of a much larger development within Hastings Borough of some 1,000 dwellings and 10, 000 sqm of employment floorspace proposed in its

draft core strategy (Hastings Local Development Framework Core Strategy – Preferred Approaches (2008)).

### Comment

#### *Distribution of Development*

34. *Without the BHLR there is no realistic prospect of providing sustainable growth on the level required by the RSS in Rother District. However, the Core Strategy is right to consider the alternatives to the preferred development strategy given that it rests on the delivery of a single major infrastructure project.*

35. *Nonetheless, the BHLR has reached a milestone in its development. Following consideration of the planning application at its meeting of 10 December 2008, the County Council's Planning Committee resolved to approve subject to departure procedures. There is the possibility of the Secretary of State calling in the application for her own determination given that the application is considered to be a departure from aspects of the adopted development plan, but it is difficult to gauge at this point whether this will occur. It is evident that a call in inquiry would introduce further risk to the timely delivery of the BHLR.*

36. *The contingencies identified in the Core Strategy are, in essence, a rephrasing of development and initiating a review of the strategy should the BHLR not come forward by 2016. Although the Core Strategy recognises uncertainty remains over the delivery of the BHLR, it does not address the issue that there is no opportunity for sustainable growth on the levels required by the South East Plan in Rother, other than in Bexhill.*

37. *The proposals for the development of the Hastings Fringes at Breadsell and Wilting are subject to varying degrees of uncertainty. Proposals for development at Wilting are clearly linked to the realisation of a new railway station, the viability of which has yet to be demonstrated and is subject ongoing feasibility studies. Development at Breadsell is presented as part of a larger scheme within Hastings Borough. Strategic development at this location is not free of risks to delivery as it requires both the BHLR and the Baldslow Link to provide adequate capacity. Moreover, Hastings Borough Council has yet to present compelling evidence that this strategic development will need to be called upon in the period up to 2026; this issue may be resolved as Hastings prepare its submission draft of the Core Strategy.*

38. *Some flexibility is allowed for in the Core Strategy to accommodate this uncertainty, and it is evident that further detailed work, building upon the landscape advice and transport modelling already undertaken with the County Council, will be needed to determine the levels of development at North Bexhill and small fringe sites around Bexhill. There is also the role of windfall sites coming forward within Bexhill which will contribute to the overall development requirement, but have not been included in the Core Strategy's estimation of housing land supply.*

39. *However, it is evident that the summary of housing land supply (reproduced in this report) and Appendix 3 of the core strategy do not sum correctly. Although the Core Strategy claims to provide for a range of 5,600 – 5,850 dwellings, the components of supply described in the Strategy provide a range of 5,500 – 6,000 dwellings. This lower figure undershoots regional requirements by 100 dwellings.*

40. *There may well be scope to make good this accounting shortfall (and the potential for the Hastings Fringe sites not coming forward) at North Bexhill and through windfalls, and this will become apparent once more detailed studies of North Bexhill determine its real potential. Therefore, clarification is sought on the actual level of development the Core Strategy is planning for, and how the uncertainty surrounding the Hastings fringes can be managed.*

41. *In the event of the Wilting employment land not coming forward the draft strategy introduces some flexibility by considering a range of development at Rye Harbour Road. Yet the deliverability of a larger quantum of development (20, 000 sqm) at this location is uncertain given its lack of strategic communication links to the rest of the county and the region as a whole.*

42. *This issue of employment land raises a wider concern that the Core Strategy sets out employment land requirements but not in terms of job numbers. Consequently, it is difficult to discern to what extent the quantity and distribution of employment land will provide for employment growth which matches workforce growth as expressed in the Core Strategy and required by the Sussex Coast sub regional strategy.*

### Education

43. *Section B(i) of the preferred strategy for Bexhill makes reference to the implementation of a new secondary school. The school has been given planning permission and importantly it should be recognised that this is a replacement and not a new school in addition to what is provided in Bexhill. There is no mention of further pre school, youth, or special needs school facilities in the preferred strategy, and appropriate reference needs to be made.*

### **Battle and Rye and Rye Harbour**

44. Beyond Bexhill the significant settlements in Rother district are Battle and Rye, and each is given its own chapter in the Core Strategy. The objectives for Battle focus on improving its service, commercial and tourist centre role and maintaining its identity and conserving its key characteristics.

45. As outlined earlier in the Core Strategy, some 500 dwellings is considered to be an appropriate level of development for the town up to 2026. Taking into account what is already in the pipeline (completions, permissions and allocations in the local plan) there remains somewhere between 88 and 138 dwellings to be allocated. The Core Strategy suggests an area of search for this outstanding figure as being land between Hastings Road and Marley Lane, and south of Hastings road and east of the historic battlefield.

46. In line with the aims to maintain and improve the role of the town a total of 10, 000 sqm of employment floorspace is considered necessary over the twenty year period; it is proposed that some 70% of this requirement can be met at Marley Lane, with the remainder being developed at Station Approach within the town and close to the rail station.

47. Rye is a small remote town, the majority of which is at risk from flooding, it is subject to a number of environmental constraints and suffers from deprivation across a range of indicators. The principal aim for the area is to improve social and economic conditions and enhance the environment and quality of life for residents.

48. To achieve this Core strategy considers that 10, 000 – 20, 000 sqm of employment floorspace is required at Rye Harbour Road and at Rock Channel. Housing development of 450 dwellings is proposed, but once all other sources of supply are discounted there remains only a requirement for 20 additional dwellings over the Core Strategy period.

### Comment

49. *The levels of housing development proposed in these settlements are modest. However, given local environmental constraints and potential traffic impacts it is evident that further detailed work is necessary in conjunction with ESCC to identify the optimal locations for such development.*

## Education

50. *Although the Core Strategy refers to the fact that ESCC Children's Services does not consider that a new primary school at Battle is necessary (paragraph 7.33), paragraph 7.42 lists a primary school as part of the overall infrastructure requirement for the town. This latter reference should be deleted.*

51. *Reference is made to a new primary school in school in Rye which is expected to be completed in 2009, the new Rye Community Primary School opened in September 2008.*

## Rural Areas

52. *Rother is predominantly rural district with much of area designated as AONB. The strategy for the rural areas is based upon the principles of supporting and enhancing the vitality and viability of village communities, and promoting land management which supports and contributes to the distinct landscape and biodiversity. The rural area is allocated limited levels of development, as required by the soon to be agreed SEP, and is apportioned according to the hierarchy of settlement functions established by the District Council.*

### Comment

53. *The general approach for distributing development within the rural areas is consistent with that employed by the County Council in its advice to the Regional Assembly on a distribution for the rest of East Sussex which informed the draft South East Plan.*

54. *It will be necessary to undertake further more detailed work on the implications of the proposed distribution and quantum of development in Rother's villages, in terms of landscape and transport impacts, and in relation to the provision of education in the rural areas. Whilst some development will be welcome in the rural areas to assist in maintaining small rural primary school rolls, it is evident that problems may be encountered in terms of capacity and the ability of some schools to expand. These issues will need to be discussed with Rother District as it works towards finalising the core strategy.*

## PART III STRATEGY THEMES

### Communities

55. *The Communities section aims to support and further develop vibrant, safe, balanced and inclusive communities. The strategy for communities comprises six components, namely;*

- *The quality, quantity, location, and type of affordable housing*
- *Health, recreation and community facilities;*
- *Gypsies and travellers*
- *Older People*
- *Crime reduction and prevention*
- *Young people*

### Comment

56. *There is a clear need for affordable housing in Rother District, and the core strategy proposes options for a strategy to securing affordable housing based (in part) on established Local Plan policy and the District Council's Affordable Housing Supplementary Planning Document.*

57. *Key to the pressing need for the District to provide affordable housing is the issue of viability and ability of developers to deliver the percentages of affordable housing proposed*

*in the Core Strategy. The right balance needs to be struck between the optimal level of affordable housing and not removing incentives to the development industry. The Core Strategy notes that further work will need to be undertaken on the issue of viability and further limited consultation on the preferred approach will take place in the New Year.*

58. *In light of this the County Council would wish to maintain its engagement with the District Council as technical work is undertaken and a preferred strategy is consulted upon.*

59. *Clarification is sought on the statement at paragraph 10.28 where a small amount of market housing, effectively to incentivise the development of affordable housing allocations in the rural areas would be appropriate. It is not clear whether this is a reference to exception sites or not. Structure Plan saved policy H5 and Planning Policy Statement 3 (Housing) state that rural exception sites for affordable housing must not contain an element of market housing.*

60. *The preferred strategy for older People provides criteria and principles for integrating the needs of older people within the spatial planning system and as such can be supported. Whilst it is appreciated that the majority of older people live in Bexhill, over 40% of older people in Rother live in rural areas, this should be reflected in the Core Strategy.*

61. *Whilst a strategy for young people is not proposed, the topic merits section in the consultation document. A key point is raised in relation to paragraph 10.60 which reports that unauthorised absences in Rother Schools is higher than average, and GCSE/A level grades are lower than regional averages. In fact the reverse is true in both instances; unauthorised absences are lower and grades are higher than average.*

## **Economy**

62. *The economy of Rother District is very weak; earnings are low in comparison with the rest of the south east region, as are skills levels. Lower paid service sectors dominate the job market, and it is evident that 17% of the workforce commutes out of the district to work. Hastings forms the centre of the local labour market area, yet its own economy performs poorly.*

63. *Thus, the objectives of the core strategy in respect of the economy are;*

- *to raise aspirations, and improve educational attainment;*
- *to increase skill levels;*
- *to increase the business base and overall productivity;*
- *to expand the range of job opportunities;*
- *to improve the balance of homes and jobs; and,*
- *to increase local earnings relative to living costs.*

64. *It is proposed that these objectives are addressed through collaborative working with a range of agencies, continued support and participation the work of the Hastings Bexhill Task Force, the provision of new employment floorspace, and the protection of existing employment uses from adverse development proposals. Central to the strategy is the release of employment land following the completion of the BHLR.*

## **Comment**

65. *The emphasis placed upon the raising of educational attainment and investment in educational facilities throughout the core strategy is to be welcomed and supported.*

66. *The preferred strategy for the Economy highlights the roles of key agencies in the regeneration of the area. Emphasis is placed upon the role of the Hastings Bexhill Task Force and Sea Space in securing a step change in the local economy, in accordance with*

*sub regional and local objectives. Whilst this approach is supported, it would be appropriate to amend the Core Strategy's overall aims, objectives and strategy to reflect the joint working with other agencies to secure the regeneration of the area.*

## **Environment**

67. Six component preferred strategies for the environment are described in the consultation document. The Landscape Stewardship strategy which seeks to protect and where possible enhance the District's nationally designated and locally distinctive landscapes and historic sites. A strategy for Design Quality and the Built Environment is proposed which emphasises the need to secure high quality and sustainable design through the planning process and commits the District Council to providing more detailed guidance at a later date. The management and protection of biodiversity and greenspace merits its own strategy which identifies the need to comply with national and international legislation, incorporate biodiversity and greenspace requirements in new development and delivering strategic objectives such as the Green Network Strategy and the Romney Marsh Living Landscapes project.

68. Separate strategies addressing the need to minimise the environmental impact of development, to provide necessary water supply and waste water management facilities to support development, and to manage and reduce flood risk are also proposed.

### Comment

#### *Archaeology*

69. *The draft Core Strategy recognises the importance of heritage in terms of the appearance and feel of buildings and conservation areas and their contribution to the distinctiveness of Rother. However, there is little consideration of the archaeological potential of the district and how that might inform our understanding of the environmental and established communities. The County Council in has completed the Historic Landscape Characterisation of Rother which is a useful tool in developing the District's Historic Environment Record, and help define the character and potential of discrete areas to accommodate development as the Core Strategy is further refined.*

#### *Minerals and Waste*

70. *Given the significant role of LDFs in implementing waste and mineral policy it would be appropriate for the strategy for sustainable resource management to include reference to the need to conserve minerals and minimise waste generation. It is also notable that the list of relevant policies, plans, strategies, and programmes does not include the East Sussex Municipal Waste Management Strategy, nor does it appear to support its objectives and actions.*

#### *Climate Change*

71. *Whilst the proposed Strategy for Sustainable Resource Management acknowledges the need to adapt to the anticipated impacts of climate change and the Challenges and Drivers for Change earlier in the document identify likely climate effects on the District, the emphasis is on mitigation (reducing green house gas emissions). Planning Policy Statement 1 (climate change supplement) requires LPAs to minimise vulnerabilities and provide resilience to climate change, the Climate Change Act (2008) The Act also introduces powers for Government to require public bodies and statutory undertakers to carry out their own risk assessment and make plans to address those risks. Furthermore, the Local Area Agreement for East Sussex includes National Indicator 188 which requires the local authorities to ensure that key climate vulnerabilities for the area are identified and measures are put in place to manage climate risk and maximise resilience throughout all East Sussex local authority services by 2011.*

72. *Work on meeting the requirements of NI188 is at an early stage and is being undertaken jointly by all East Sussex authorities and led by the Environment Agency. Consequently, the timing of the core strategy and the development of climate change resilience throughout the County is misaligned. However, the Core Strategy would benefit from an understanding of the climate effects and impacts on key sectors and what this would mean for spatial planning policy.*

### **Transport and Accessibility**

73. The poor condition of strategic transport links and the predominantly rural nature of Rother present challenges in improving local accessibility to services and employment and to improve intra regional connectivity and assist in the regeneration of the coastal economy.

74. The Core Strategy aims to address these distinct but complementary strands of transport policy by continuing to press for timely strategic transport improvements (both road and rail) within the District (including the Baldslow Link and the Bexhill Hastings link Road) and beyond including the A21, A27 and increased rail passenger capacity on rail links to London. Emphasis is also placed on supporting Hastings on developing its role as a regional hub. The second strand of transport policy is to increase the accessibility of jobs and facilities through the improvement of the public transport network, the location of new development, the implementation of local accessibility strategies, managing car use and supporting sustainable transport initiatives which exploit the improved connectivity between Hastings and Bexhill provided by the link road.

### Comment

75. *The approach taken by the Core Strategy accords with the objectives of the East Sussex Local Transport Plan and the Local Area Transport Strategies (LATS) for both Battle and Rye. Ongoing joint working on the transport impacts of the draft development strategies for both Bexhill and Hastings have informed this draft document and the Hastings Bexhill LATS (which is to be published for consultation in 2009). This ongoing work will assist in providing greater detail on the accessibility and transport needs of the district in the final submission draft of the Core Strategy.*