

05 Evidence Based Review Comments (AECOM)

Policy	Summary of main issues and concerns raised (not verbatim)	Parish Council Response	Resultant changes to Draft Plan
R1 AONB	No documents on “active travel” (cycling, walking) in Evidence Base,	Add the following documents: Hastings and Rother Accessibility Assessment (2007) ESCC Local Transport Plan (2016/17-2020/21).	Added documents to Evidence base.
	Add value to this policy by local distinctiveness (e.g. with Local Landscape Character Assessment).	The Parish Council does not feel that a Local Landscape Character Assessment would add value to that in the High Weald AONB Management Plan – Ticehurst is a typical AONB Parish.	No change.
R2 Green Gaps	Call for Sites document criteria should reference consultation statements.	Call for Sites document replaced by Site Assessment document. References to consultation statements to be added.	New Site Assessment document.

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R ₃ Green Spaces	Insufficient evidence on why each area should be designated and how its qualities would endure beyond the plan period. Policy CF ₂ of Rother local plan protects recreational facilities.	Add the following document: <ul style="list-style-type: none"> • Rother DC Green Infrastructure Background Paper Addendum (2016). • Strengthen reasons for designating particular green spaces. • Cross-reference AONB plan landscape character assessments. 	Add document to Evidence base. R ₃ has been modified.
R ₄ Footpaths & Cycle paths	No major problems but would benefit from correlating with AONB maps of Historic Routeways and ESCC maps of PRoW	This would be a major task.	No change.
E ₁ Protect local services	No major problems	Reference Rother Local Plan: <ul style="list-style-type: none"> • Policy EC₇ Retail Development • Policy EC₃ Existing Employment Sites. 	E ₁ has been modified.

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E2 Support tourism	No major problems	Reference Rother Local Plan: <ul style="list-style-type: none"> • Policy EC6 Tourism Activities and Facilities. 	E2 has been modified.
E3 Promote agricultural diversification	No major problems	Reference source of data – 2% of jobs within the Parish.	E3 has been modified.
E4 Protect Business Sites	No major problems	Reference source of data – 50% of jobs done by local people Reference Rother Local Plan: <ul style="list-style-type: none"> • Policy EC2 Business Land and Premises • Policy EC3 Existing Employment Sites • Reference DaSA Local Plan Employment Sites Review • Reference Hastings and Rother Employment Strategy and Land Review (2008). 	E4 has been modified. Added documents to the Evidence base.

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E5 Protect and enhance village centres	No major problems	Reference survey of Flimwell residents on village hall and shop. Add “protection of facilities from change of use” to policy.	E5 has been amalgamated with E1 and incorporates the changes suggested.
E6 Improve essential infrastructure	No major problems	Policy description could be broadened to include objectives from TNP and planning policies referred to.	E6 has been modified.
H1 Spatial Plan	Universal policy of max 30 houses per ha has no evidence.	Change wording to “seek 30 dwellings per ha to be applied on a case-by-case basis”.	H1 has been modified.
	Poor choice of words in third criteria “priority will be given”	Change wording to “smaller in-fill schemes on brownfield sites are supported”.	H1 has been modified.
H2 Housing site allocations	Concern over the robustness of Site Allocation	Rewrite Call for Sites document as Site Assessment, using AECOM’s Site Assessment tool.	H2 has been modified. New Site Assessment document has been written.

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H3 Mix of housing	Policy wording vague and open to wide interpretation.	Rewrite policy using data from Rother Strategic Housing Research Report (2018) to review and justify the mix of housing.	H3 has been modified.
		Add the Report to the Evidence Base.	Added Rother Strategic Housing report to Evidence base.
H4 Affordable Housing	Figures for houses built since 2011 do not tally.	Review houses completed since 2010.	Documents in Evidence base on housing have been reviewed and modified.
	Local connection test is weakly worded.	Rewrite local connection test with more evidence if possible.	H4 has been modified.
H5 Design of Buildings	No reference to PLACE and Visioning exercises	<ul style="list-style-type: none"> • Reference early consultations (PLACE and Visioning). • Design Guidance should refer to The Design Council's Building for Life 12 (2012) 	<ul style="list-style-type: none"> • H5 has been modified • Design Guidance has been modified.

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H5 Design of Buildings	Policy on light pollution adds nothing to the Local Plan policies. Additions to existing buildings may be exempt from planning permission.	Reword on light pollution to be more local.	Design Guidance has been modified.
H6 Conservation and Heritage	<ul style="list-style-type: none"> • Insufficient evidence for this policy. • Part 1 of the policy is too broad and lacks detail as to how it will be achieved. • Suggest changing Part 2 “will be carried out in conjunction with” to “will conform to”. 	Review the policy wording.	H6 has been modified.

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INF ₁ Improvements to village centres	<ul style="list-style-type: none"> • Insufficient evidence. • Public realm strategy referred to is not yet documented. • Policy should define priorities for public realm improvements. • Policy does not define how to manage change in this area. 	<ul style="list-style-type: none"> • Reference early consultations (PLACE and Visioning) • Reference Rother Policy EN₂, EN₃ and TR₃. • Tie in Design Guidance and Conservation Area Appraisal to give one strategy and design guidance document. 	INF ₁ has been modified.
INF ₂ Community energy projects	<p>Two minor wording changes in supporting text:</p> <ul style="list-style-type: none"> • Omit “A secondary goal would be to provide help and advice on energy efficiency.” • Elaborate “working in partnership”. 	Reference Rother Policy SRM ₁ and modify supporting text wording.	INF ₂ has been modified.

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INF ₃ Community areas	Is there a local requirement for developers to produce maintenance plans? (Reference is to South Cambs DC).	Add the following documents: <ul style="list-style-type: none"> • Rother Open Spaces, Sport and Recreation Study (2007). • Reference Rother Policy CO6. 	<ul style="list-style-type: none"> • INF₃ has been modified. • Added documents suggested to Evidence base.



