

SEDLSCOMBE NEIGHBOURHOOD PLAN 2014-2028

2. BASIC CONDITIONS STATEMENT

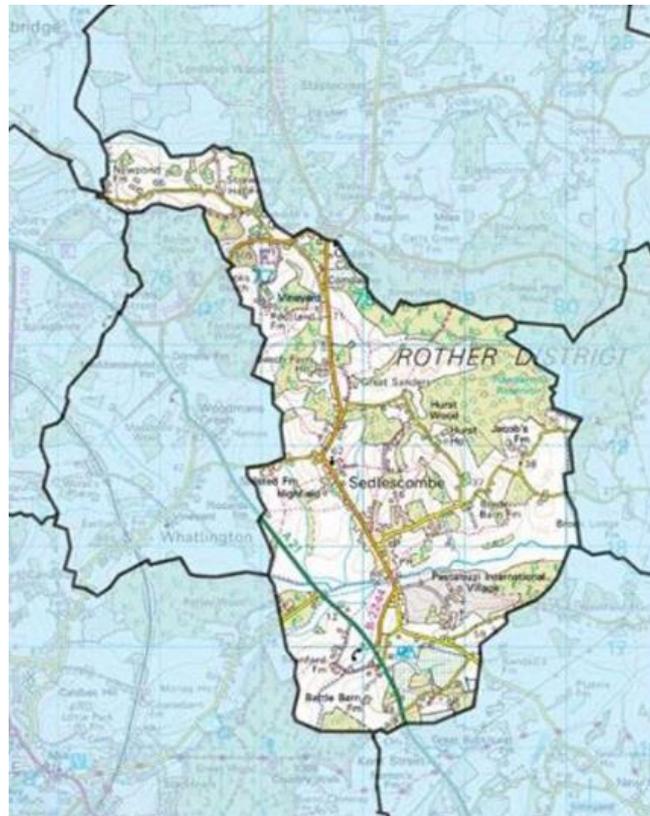


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Neighbourhood Planning (General) Regulations 2012

July 2014

1. Introduction

1.1 This Statement has been prepared by Sedlescombe Parish Council (“the Parish Council”) to accompany its submission to the local planning authority, Rother District Council (“the District Council”) of the Sedlescombe Neighbourhood Development Plan (“the Neighbourhood Plan”) under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (“the Regulations”).



Plan A: The Designated Sedlescombe Neighbourhood Area

1.2 The Neighbourhood Plan has been prepared by the Parish Council, the qualifying body, for the Neighbourhood Area covering all of the parish, as designated by the District Council on 1 July 2013 (see Plan A above).

1.3 The policies described in the Neighbourhood Plan relate to the development and use of land in the designated Neighbourhood Area. The plan period of the Neighbourhood Plan is from 1 April 2014 to 31 March 2028 and it does not contain policies relating to ‘excluded development’ as defined and required by the Regulations.

1.4 The Statement addresses each of the four ‘basic conditions’ required of the Regulations and explains how the submitted Neighbourhood Plan meets the requirements of paragraph 8 of Schedule 4B to the 1990 Town & Country Planning Act.

1.5 The Regulations state that a Neighbourhood Plan will be considered to have met the basic conditions if:

- having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the neighbourhood development plan,

- the making of the neighbourhood development plan contributes to the achievement of sustainable development,
- the making of the neighbourhood development plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),
- the making of the neighbourhood development plan does not breach, and is otherwise compatible with, EU obligations.

2. Background

2.1 The Parish Council commenced preparation of the Neighbourhood Plan in 2012, as the first such project in the District. The key driver of that decision was the opportunity for the Parish Council to take on the responsibility to determine the housing land allocations required to meet the requirements of the forthcoming Rother District Local Plan (2011-2028) Core Strategy (“the Core Strategy”) and to promote sustainable development in the parish.

2.2 A Steering Group was formed comprising Parish Councillors and local people and it was delegated authority by the Parish Council to make day-to-day decisions on the Neighbourhood Plan. However, as the qualifying body, the Parish Council has approved the publication of the Pre-Submission and Submission versions of the Neighbourhood Plan.

2.3 The Steering Group has undertaken considerable community engagement activities over the duration of the project, including the formal consultations required by the Regulations and many informal public events. It has also engaged with landowners, developers and other interested parties to ensure it has fully understood the availability and achievability of sites. It has worked with officers of the District Council during the preparation of the Neighbourhood Plan and has appointed its own professional planning advisor to assist in the formulation and drafting of policy.

2.4 The positioning of the Neighbourhood Plan in respect of the adopted and emerging development plans has been relatively straightforward. The 2006 Rother District Local Plan (“the Local Plan”) comprises a wider range of saved policies that provide a relevant strategic planning policy framework for the Neighbourhood Plan. Its replacement, the Core Strategy, has been examined and it is expected that it will be adopted shortly. It updates local housing supply policy and provides a clear reasoning and evidence base to direct the housing supply provisions of the Neighbourhood Plan and the criteria for selecting housing site allocations. Both the Local Plan and the Core Strategy have therefore been used to determine the general conformity of the Neighbourhood Plan with the strategic policies of the development plan.

2.5 It is the intention of the District Council to prepare a Development & Site Allocations Plan, which will effectively become the second part of the new development plan to replace the remaining saved policies of the 2006 Local Plan, in respect of development management policies and site allocations pursuant to the Core Strategy. The District Council has agreed that a role of the Neighbourhood Plan has been to make housing site allocations, in so far as that is possible, and to propose Local Green Space designations that may otherwise be made by the Development & Site Allocations Plan. In most respects, therefore, the policies of the 2006 Local Plan and then of the Development & Site Allocations Plan in due course will apply to this Neighbourhood Area.

2.6 The Neighbourhood Plan has a relatively narrow focus on policies that define the Sedlescombe village settlement boundary, that either allocate or offer support in principle to a series of housing and mixed use sites for development and that designate Local Green Spaces. For the most part, the plan has deliberately avoided containing policies that may duplicate the development policies that are, and will be, material considerations in determining future planning applications.

3. Conformity with National Planning Policy

3.1 The Neighbourhood Plan has been prepared with regard to national policies as set out in the National Planning Policy Framework (NPPF) of 2012 and has sought to reflect the National Planning Practice Guidance (NPPG) of 2014 in respect of formulating neighbourhood plans.

3.2 The Submission document, and the Pre-Submission document that preceded it, both include a specific NPPF conformity reference for each policy and, where relevant, further reference in the supporting text.

3.3 In overall terms, there are seven NPPF paragraphs that provide general guidance on neighbourhood planning, to which the Neighbourhood Plan has directly responded:

Para 16

3.4 The Parish Council believes the Neighbourhood Plan is planning positively to support the strategic development needs of the district by shaping how, where and when development should be delivered, which accord with the local community's clear spatial vision for the parish.

3.5 The Neighbourhood Plan has not sought to resist development having failed to identify sufficient suitable and acceptable sites for development on the edge of Sedlescombe village to meet the provisions of the Core Strategy. Rather, it has taken the opportunity to allocate or support in principle the development of a number of sites in close proximity to the village, each of which will deliver other important social and/or economic benefits. In doing so, each site provides a justification for development in the High Weald Area of Outstanding Natural Beauty, within which the entire parish is located.

Para's 17, 22 & 158

3.6 The Neighbourhood Plan has taken account of market signals in respect of land availability for development and land prices and, importantly, seeks itself to send clear signals to land owners and investors to encourage appropriate development proposals (para 17). In doing so, it has acknowledged the high costs of promoting employment development proposals through the planning system and then of implementing those proposals on primarily brownfield sites to avoid undeliverable proposals (para 22). It has therefore shaped its policies to reflect the extent to which the evidence is available to support its proposals. The financial burden on applicants is considerable, especially in respect of providing the full details of the schemes and viability appraisals. The policies are intended to lower the planning risk by supporting the key land use principles to encourage planning applications to be made and properly evidenced (para 158).

Para 183

3.7 The Parish Council believes the Neighbourhood Plan establishes in its Section 3 a vision for the Neighbourhood Area that reflects the view of the vast majority of the local community. It has translated the vision into a series of objectives and planning policies that will form part of the development plan and help ensure future planning applications deliver the quality of sustainable development desired by the community.

Para 184

3.8 The Parish Council believes the Neighbourhood Plan, as is highlighted below, is in general conformity with the relevant saved policies of the adopted Local Plan and with the imminent strategic policies of the Core Strategy as they apply to Sedlescombe. There is no obligation on the Neighbourhood Plan to satisfy the full housing provisions of the Core Strategy and, indeed, this has proven not to have been possible. However, the Neighbourhood Plan is positive about housing development enabling the achievement of other strategic employment, heritage and community objectives of the Core Strategy. The precise relationship between the policies and those of the development plan is explained in greater detail in section 5 below.

Para 185

3.9 The Neighbourhood Plan avoids duplicating development plan policies by focusing on site-specific policies that translate the general requirements of the development plan into a local context. Once made, the Neighbourhood Plan should be easily considered alongside the development plan and any other material considerations in determining planning applications.

3.10 The Neighbourhood Plan also acknowledges that its policies may not deliver the quantum and type of development envisaged by the Core Strategy during the early part of the plan period. Although the landowners and developers appear keen to respond positively to its supportive policies, the sites each represent delivery challenges. It therefore proposes that the first review of the Neighbourhood Plan will provide the opportunity to review the delivery of the policies and to make new provisions if necessary. In which case, there will be no need for any amendments to be made to the Core Strategy to accommodate the provisions of the Neighbourhood Plan.

3.11 Set out in Table A below, is a brief summary of how each policy conforms to the NPPF. The particular paragraphs referred to in the table are those considered the most relevant to each policy but this is not intended to be an exhaustive list of all possible relevant paragraphs.

Table A: Neighbourhood Plan & NPPF Conformity Summary

| No. | Policy Title | NPPF Ref. | Commentary |
|-----|-------------------------------|----------------------|--|
| 1 | A Spatial Plan for the Parish | 28, 50, 55, 115 | <p>The policy restates the purpose and value of the built up area boundary, defined by the development plan, for distinguishing the settlement of Sedlescombe from the surrounding countryside. In doing so, it promotes the vitality of the settlements and has given considerable weight to conserving the special landscape character and scenic beauty of the High Weald Area of Outstanding Natural Beauty (AONB), as required by Para 115.</p> <p>The 2006 Local Plan boundary has therefore been re-drawn on the Proposals Map only to allow for a small housing site allocation in a location that is consistent with Para 115. Elsewhere, the existing boundary has been retained as there are no sites that will provide a sufficient justification to support an allocation in line with Para 115 or that will win local community support.</p> <p>However, the policy does support windfall development within the settlement boundary, which has consistently delivered an average of 2-3 homes per annum over the last 20 years. Importantly, it also makes specific provision for development outside the settlement boundary in a series of policies in the Neighbourhood Plan (policies 2 – 6) that are intended to deliver a range of housing types and tenures (Para 50); significant local rural employment opportunities (through job creation and protection; Para 28) and valuable heritage asset conservation and community benefits. Together, the objectives within this spatial policy will enhance the vitality of this rural community (Para 55).</p> |
| 2 | Sunningdale | 50, 58,100, 115, 117 | <p>The policy allocates a small area of land in established (single) residential use for a scheme to deliver an additional 6 dwellings to contribute to the supply of housing in the village. Although part of the land is currently outside the settlement boundary, that boundary will be redrawn by Policy 1 to include the whole site. The land is small and is surrounded on three sides by existing development and so its impact on the AONB is negligible (in line with Para 115) and is now defined by the Environment Agency as outside the area subject to flood risk from the River Brede, so accords with Para 100. That said, the policy establishes the key design principles (as per Para 58) to ensure a future scheme will respond to the characteristics of the site and its surroundings. This includes the need for a scheme to avoid damaging the adjoining river habitat interest (Para 117).</p> |

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| 3 | Pestalozzi International Village | 28, 50, 54, 111, 115 | The policy supports in principle the redevelopment of brownfield land within the complex of existing residential and other buildings at the Village for additional homes, some of which will be delivered as affordable homes with preference given to eligible employees of the educational charity in perpetuity. In doing so, the policy not only makes a contribution to the supply of housing to meet local need (Para 50) it also benefits the largest employer in the parish by enabling it to secure housing for its employees (Para's 28 and 54). A large part of the site is located on the footprint of a former building, thus the policy is promoting the beneficial reuse of brownfield land (Para 111). Given the location of the site within an existing building cluster, and the other accrued social and economic benefits, the policy also provides sufficient justification for development within the AONB (Para 115). |
| 4 | Blackbrooks | 28, 32, 50, 54, 70, 111, 115 | The policy supports in principle the redevelopment of a derelict, brownfield site (Para 111) to the rear of the well-established Blackbrooks Garden Centre for new homes to contribute to the supply of local housing to meet local need (Para 50). Like Policy 3, the policy will enable another important local employer and popular service provider to maintain its operations effectively (Para 28) by making some of the affordable homes available for eligible employees in perpetuity (Para 54) though the policy requires a full financial appraisal to justify the scheme. The Centre is also a very popular and well-liked community asset, providing a shop and café in close proximity to the village, which, although in private ownership, the community has expressed a keen interest to retain (Para 70). The policy makes provision for a satisfactory site access to be achieved and for there to be no conflict with users of the A21 on which the Centre is located (Para 32). Both the Highways Agency and the local highway authority have confirmed that they have no objection to this proposal in principle, as it is the intention of the Agency to introduce a lower speed limit on this section of the A21 in any event. The site is well screened from the AONB countryside beyond by woodland and therefore, together with the significant social and economic benefits arising from the scheme, the policy accords with Para 115. |
| 5 | Sawmills | 22, 28, 50, 111, 115 | The policy supports in principle the redevelopment of land for a mixed employment, housing and tourism use scheme at the Sawmills, a primarily derelict industrial use north of the village. There is little prospect of an economically viable reuse or employment-only redevelopment of the site. The policy seeks to allow other uses (Para 22) to deliver a viable employment proposition in this rural area (Para 28), including realising tourism value through the provision of holiday accommodation. The policy makes it clear that the inclusion of open market housing is only to cross-subsidise the delivery of the employment scheme and only the minimum |

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| | | | number of dwellings will be allowed to achieve that objective. An initial assessment indicates that this may require approximately 6-8 dwellings, which will also contribute to meeting local housing need (Para 50). The policy requires a full viability appraisal to determine the precise number of dwellings required and ensures that those dwellings cannot be occupied until the employment scheme has been delivered. The site has some degree of prominence in the AONB landscape but its current appearance detracts from the scenic beauty of the AONB. The policy therefore provides a range of justifications for enabling development in the AONB (Para 115). |
| 6 | Parish Church | 50, 54, 70, 115, 126, 140 | The policy supports in principle the development of land for housing development adjoining the curtilage of the Grade II* St. John the Baptist Church just to the north of the village. Like Policy 5, the intent of the policy is to deliver a housing scheme that will enable other important objectives to be achieved, in this case the delivery of a community benefit scheme. The policy requires the housing scheme to comprise the minimum number of open market homes to finance the delivery of primarily affordable homes and of a range of community benefits. In doing so it will contribute to the supply of homes to meet local need (Para 50) but also secure the long term future of the cherished heritage asset, the benefits of which outweigh the disbenefits of departing from policies in respect of development in the AONB and affecting the setting of a heritage asset (Para 140). The housing element shares similarities with a rural exception scheme on land that is reasonably well located for that purpose (and with a willing landowner; Para 54). The land is large enough for a scheme to comprise a layout and design that does not undermine the heritage significance of the setting to the Church to the South (Para 126) and to allow for a significant landscape scheme around its eastern edge to mitigate its impact on the AONB open landscape beyond (115). The policy judges that in principle the weight attached to the conservation of the heritage asset (which itself will allow for greater community use of the building and to resolve existing car parking and highway difficulties) is greater than any disbenefits that may accrue in respect of its setting. The policy makes clear the need for a future planning application to demonstrate how the details of a scheme will accord with that weighting. |
| 7 | Local Green Spaces | 76, 77 | The policy designates two sites adjoining the village as Local Green Spaces in accordance with intent and criteria of Para's 76 and 77. Both sites have been considered for potential housing development and one – Street Farm – has recently been refused permission although the District Council had previously identified the site having potential for housing in its SHLAA. In both cases, it is clear that there is considerable local community opposition to development and this policy device will effectively address this matter by preventing |

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| | | | development for at least the plan period and beyond. In the event that a review of the Neighbourhood Plan or another part of the development plan for Rother is undertaken in the next decade or so, neither site will be considered suitable for housing development and will therefore not be evaluated as options. The supporting text to the policy sets out how each site complies with the criteria in Para 77. |
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4. Contribution to Sustainable Development

4.1 A Strategic Environmental Assessment of the Neighbourhood Plan has been undertaken in accordance with the EU Directive (see 6.1 below). This has concluded that there are no likely significant effects on the environment that cannot be avoided or mitigated by future planning applications. However, more than just avoiding such impacts, the Neighbourhood Plan can also clearly demonstrate that it will contribute to the achievement of sustainable development in terms of how its policies will deliver a blend of economic, social and environmental benefits for the parish.

4.2 The strategic objectives of the Neighbourhood Plan comprise a balance of social, economic and environmental goals. On the one hand, it seeks to meet its responsibility for planning positively for development to remain in conformity with the development plan. On the other, the local community is keen to ensure the highest quality landscapes, especially to the south and east of the village, are protected and flood risk is managed effectively. In return, the local community also expects to see improvements to local community facilities and high quality development schemes.

4.3 The Neighbourhood Plan therefore proposes a series of policies to deliver well-designed housing to stitch in to the existing village and to promote new employment to serve local social and economic goals. The chosen policies are intended to accurately translate these goals into viable and effective development management policies and deliverable infrastructure proposals.

4.4 The sustainability attributes of each policy are summarised in Table B below.

Table B: Neighbourhood Plan & Sustainable Development Summary

| No. | Policy Title | Soc. | Eco. | Env. | Commentary |
|-----|----------------------------------|------|------|------|--|
| 1 | A Spatial Plan for the Parish | * | 0 | ** | The policy promotes the most sustainable pattern of growth for the village by confining development to the settlement boundary and only very modestly extending the boundary where its environmental impact will be low. In doing so, the policy will maintain the strong identity of the village with the special landscape character of the AONB and will encourage and enable other policies of the Neighbourhood Plan to deliver a wide range of other social and economic benefits. |
| 2 | Sunningdale | * | 0 | 0 | The policy will contribute to the supply of housing to meet local need for a social benefit. Given its small scale and location within surrounding development, the allocation will have a neutral environmental impact. |
| 3 | Pestalozzi International Village | * | * | * | The policy will contribute to the supply of housing to meet local need for a social benefit. It will help secure the success of an important employer in the parish by retaining jobs for economic benefit. Given its small scale and location within an existing cluster of buildings, and its reuse of brownfield land, the allocation will also have a positive environmental impact. |
| 4 | Blackbrooks | ** | ** | * | The policy will contribute to the supply of housing to meet local need and supports the continued operations of a much valued community asset for strong social benefit. It will enable existing local jobs to be retained and new jobs to be created in future, delivering a strong economic benefit. Given its secluded location within surrounding AONB, and its reuse of derelict brownfield land, the allocation will also have a positive environmental impact. |
| 5 | Sawmills | * | ** | * | The policy will contribute to the supply of housing to meet local need for a social benefit. It will enable the creation of new business and tourism jobs, delivering a strong economic benefit. By bringing a derelict brownfield site back into beneficial use the policy will also have an environmental benefit. |

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| 6 | Parish Church | ** | 0 | * | The policy will contribute to the supply of housing to meet local need and will also enable the Church to provide better community facilities, delivering a strong social benefit. The environmental benefit is seen as positive as the benefits of securing the long term conservation of the Grade II* Church heritage asset outweigh any impact on the setting of that asset or on the AONB landscape beyond, impacts which should, in any event, be capable of being mitigated through a detailed scheme design. |
| 7 | Local Green Spaces | ** | 0 | ** | The policy will have strong social and environmental benefits in preventing the development of cherished open land adjoining the village that would otherwise impact on the identity and character of that part of the village and of the wider AONB. |

Key: ** very positive * positive 0 neutral - negative -- very negative

5. General Conformity with the Development Plan

5.1 The Neighbourhood Plan has been prepared to ensure its general conformity with the strategic policies of the development plan for Rother District. This comprises the saved policies of the 2006 Local Plan, the strategic elements of which will be replaced by the imminent adoption of the Rother Local Plan Core Strategy. Both plans are therefore assessed in respect of the general conformity of the Neighbourhood Plan.

5.2 For the most part, there is a considerable degree of conformity between the Neighbourhood Plan and development plan, including in all respects of strategic policy. In cases where the Neighbourhood Plan policy requires a justification for an exceptional circumstance to a saved policy then its supporting text makes clear this justification.

Table C: Neighbourhood Plan & Development Plan Conformity Summary

| No. | Policy Title | Commentary |
|-----|-------------------------------|--|
| 1 | A Spatial Plan for the Parish | <p>The policy accords with saved Policy DS1 in seeking to make the best use of land through the reuse of previously developed land and buildings, by respecting the importance of the countryside (especially of the AONB) and by enabling the continuing supply of housing to meet local needs, but only where this will lead to securing economic development, a community benefit and/or environmental improvement.</p> <p>The policy accords with saved Policy DS2 in supporting limited growth within the settlement boundary of the village of Sedlescombe and by restricting development in the countryside beyond the settlement boundary whilst promoting sustainable employment and other community benefits.</p> <p>The policy accords with saved Policy DS3 in maintaining the settlement boundary of Sedlescombe, subject to a minor amendment to provide for the housing allocation of Policy 2. It also accords with saved Policy DS4 in constraining development outside the boundary unless specific provision has been made by other policies.</p> <p>The SA of the forthcoming RLPCS supports the approach to provide “opportunities to reduce the need to travel by car, thereby reducing carbon emissions - and encouraging walking and cycling. The approach is also cost efficient, maximising the use of existing facilities and infrastructure and by reducing the need for new ones.” (Para 7.33). It then goes on to state that “rural communities in particular are keen to ensure that development in villages contributes to their character and sustainability of services, as well as meets local needs (such as for affordable housing, play areas, community halls, etc.). Hence, development in rural areas should be set at a level which allows for limited growth, reflecting individual settlement’s needs, opportunities and service provision.” (Para 7.41).</p> <p>The policy partially accords with Policy OSS1 of the RLPCS by facilitating the limited growth of Sedlescombe village to maintain a vibrant, mixed rural community, notably in relation to service provision and local housing needs, and is compatible with the character and setting of the village. It also allows for a small-scale infill scheme (in Policy 2) and will enable local needs for housing and community facilities to be met in close proximity to the village. The policy and its</p> |

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| | | <p>supporting text explicitly acknowledge that there are no suitable and acceptable sites on the edge of the village that would justify any further amendments to the boundary. However, rather than not encourage housing supply at all in that case, the policy allows for that supply to be met in ways that are suitable in policy terms and are therefore acceptable to local people.</p> <p>The policy accords with Policy OSS3 by maintaining a development boundary around the settlement of Sedlescombe to distinguish between areas where most forms of new development would be acceptable and where they would not. The SNP has reviewed the existing development boundary having regard to the:</p> <ul style="list-style-type: none"> (i) existing pattern, form and function of the settlement; (ii) character and settings of the village; (iii) sensitivity to further development both within the main built up confines and in more rural fringes; (iv) the amount of land needed to fulfil development needs and requirements; (v) availability of local infrastructure and services; (vi) accessibility to facilities and services, and avoiding scattered and ribbon development; (vii) environmental considerations, including the need to conserve designated areas of national and local landscape, archaeological, geological, ecological or historical importance; (viii) following physical features, unless this may suggest a potential for development that is inappropriate. <p>Para 12.17 of the RLPCS states that it may be the role of the SNP to identify and allocate potential site opportunities in and around the village. It accepts that there are limited opportunities for sensitive infilling and redevelopment within the development boundaries and therefore that new development will need to be sensitive of the need to protect and enhance the distinctive landscape character of the district. This flexible approach is consistent with Note 4 to Figure 12 of the RLPCS (p81), which states that there is a “policy expectation that new allocations are within or immediately abut a village development boundary” but it falls short of making it a requirement.</p> <p>In practice, only two sites have been made clearly available for development on the edge of the village. Policy 2 allocates one of those sites as it has had regard to the above criteria. The other site was not acceptable to the local community and, in any event, was in a location where development would not maintain the character and setting of the village and for which there are no defensible boundaries to contain development and which may then lead to future</p> |
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| | | <p>development proposals. A planning application for a housing development scheme on this site has recently been refused by RDC, thereby reinforcing this conclusion. As a neighbourhood plan policy, it has also crucially had to take into account the acceptability of boundary changes to local people, as well as the above technical criteria.</p> <p>Rather, the policy allows for a series of site-specific proposals in the SNP to be allocated or to be supported in principle in locations that are in close proximity to the settlement boundary but do not adjoin it. All the sites form part of the sphere of influence of the village's, albeit limited, services.</p> <p>The policy therefore accords with Policy RA1 whereby the needs of the village will be addressed by protecting its distinctive character, historic buildings and settings, and requiring the design of any new development to include appropriate high quality response to local context and landscape.</p> <p>Further, it accords with Policy RA2 by limiting new development to that which supports local economic or tourism needs and maintains or improves the rural character; or supports rural employment opportunities in keeping with rural character and generally conserving the intrinsic value, locally distinctive rural character, landscape features, built heritage, and the natural and ecological resources of the countryside.</p> <p>It accords with Policy RA3 by supporting suitable employment and tourism opportunities in the countryside, including by the conversion, for employment use, of farm buildings generally in keeping with the rural character, and by the sensitive, normally small-scale growth of existing business sites and premises and allowing for the creation of new dwellings in extremely limited circumstances.</p> <p>The policy accords with Policy EN1 by managing the high quality natural landscape character by ensuring the protection of the distinctive identified landscape character, ecological features and settlement pattern of the High Weald Area of Outstanding Natural Beauty.</p> |
| 2 | Sunningdale | <p>The policy accords with saved Policy DS1 in seeking to make the best use of land, by respecting the importance of the countryside (especially of the AONB) and by enabling the continuing supply of housing to meet local needs.</p> <p>The policy accords with saved Policy GD1 in being compatible with the conservation of the AONB and is not located in</p> |

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| | | <p>an area of flood risk or high agricultural value. The other provisions of GD1 (and its replacement) will continue to apply to a planning application.</p> <p>The policy accords with Policy OSS4 of the RLPCS in that it is consistent with the spatial strategy for the village and its distinct character; it makes effective use of land within the main built-up confines of the village, especially previously developed land, and maintains its character; and the scheme is deliverable given its land ownership and the viability of development.</p> <p>The policy accords with Policy OSS5 in being able to meet the needs of future occupiers, including providing appropriate amenities. It does not unreasonably harm the amenities of adjoining properties and it respects and does not detract from the character and appearance of the locality. Further, it is of a density appropriate to its context, having due regard to the key design principles.</p> <p>The policy accords with Policy EN1 by managing the high quality natural landscape character by ensuring the protection of the distinctive identified landscape character, ecological features and settlement pattern of the High Weald Area of Outstanding Natural Beauty.</p> |
| 3 | Pestalozzi International Village | <p>The policy accords with saved Policy DS1 in seeking to make the best use of land through the reuse of previously developed land and buildings, by respecting the importance of the countryside (especially of the AONB) and by enabling the continuing supply of housing to meet local needs, but only where this will lead to securing economic development and environmental improvement.</p> <p>The policy accords with saved Policy GD1 in being compatible with the conservation of the AONB and is not located in an area of flood risk or high agricultural value. The other provisions of GD1 (and its replacement) will continue to apply to a planning application.</p> <p>The policy accords with saved Policy HG2 by making provision for affordable homes outside the settlement boundary of Sedlescombe for eligible employees of the International Village, and others, whose housing needs cannot be met in the normal housing market. Evidence has been provided to establish this case and this policy requires that greater detail will be provided with a planning application. Although not immediately adjoining the boundary, the site is in close proximity</p> |

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| | | <p>(walking distance) to the village and the scale of development will be in keeping with the existing cluster of buildings on the Village site.</p> <p>The policy accords with saved Policy TR2 as the scheme will benefit from the existing road links to the village and will not result in the loss of sustainable transport facilities.</p> <p>The policy accords with Policy OSS4 of the RLPCS in that it is consistent with the spatial strategy established by Policy 1 and benefits from the capacity of existing infrastructure and services at the Village. It meets specific local need for affordable housing and will maintain the character and qualities of the landscape. It makes effective use of previously developed land and is deliverable given its land ownership and the viability of development. Finally, it supports the need for and access to employment opportunities at the Village.</p> <p>The policy accords with Policy OSS5 in that it meets the needs of future occupiers, including providing appropriate amenities, it does not unreasonably harm the amenities of adjoining properties; it respects and does not detract from the character and appearance of the locality; it is compatible with the existing use of adjacent land; and is of a density appropriate to its context, having due regard to the key design principles.</p> <p>The policy accords with Policy RA2 as the development will support local economic needs and maintains or improves the rural character, and supports rural employment opportunities in keeping with rural character. It will conserve the intrinsic value, locally distinctive rural character and landscape features of the countryside.</p> <p>The policy accords with Policy RA3 by supporting employment opportunities in the countryside by the sensitive, normally small-scale growth of existing business sites and premises.</p> <p>The policy accords with Policy EN1 by managing the high quality natural landscape character by ensuring the protection of the distinctive identified landscape character, ecological features and settlement pattern of the High Weald Area of Outstanding Natural Beauty.</p> |
| 4 | Blackbrooks | The policy accords with saved Policy DS1 in seeking to make the best use of land through the reuse of previously developed land and buildings, by respecting the importance of the countryside (especially of the AONB) and by enabling |

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| | | <p>the continuing supply of housing to meet local needs, but only where this will lead to securing economic development, a community benefit and an environmental improvement.</p> <p>The policy accords with saved Policy GD1 in being compatible with the conservation of the AONB and is not located in an area of flood risk or high agricultural value. The other provisions of GD1 (and its replacement) will continue to apply to a planning application.</p> <p>The policy accords with saved Policy HG2 by making provision for affordable homes outside the settlement boundary of Sedlescombe for eligible employees of the Garden Centre, and others, whose housing needs cannot be met in the normal housing market. Evidence has been provided to establish this case and this policy requires that greater detail will be provided with a planning application. Although not immediately adjoining the boundary, the site is in close proximity (walking distance) to the village and the scale of development will be in keeping with the existing buildings on the site.</p> <p>The policy accords with saved Policy TR2 as the scheme may improve the existing footpath and road links to the village and will not result in the loss of sustainable transport facilities. The details of improvements will be required in a planning application.</p> <p>The policy accords with Policy OSS4 of the RLPCS in that it is consistent with the spatial strategy established by Policy 1 and the capacity of existing infrastructure and services, and of any planned or necessary improvements to them. It will help meet the local need for affordable housing and will maintain the character and qualities of the landscape. It makes effective use of previously developed land and is deliverable given its land ownership and the viability of development. Finally, it supports the need for and access to employment opportunities at the Village.</p> <p>The policy accords with Policy OSS5 in that it meets the needs of future occupiers, including providing appropriate amenities, it does not unreasonably harm the amenities of adjoining properties; it respects and does not detract from the character and appearance of the locality; it is compatible with the existing use of adjacent land; and is of a density appropriate to its context, having due regard to the key design principles.</p> <p>The policy accords with Policy RA2 as the development will support local economic needs and maintains or improves the rural character, and supports rural employment opportunities in keeping with rural character. It will conserve the</p> |
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| | | <p>intrinsic value, locally distinctive rural character and landscape features of the countryside.</p> <p>The policy accords with Policy RA3 by supporting employment opportunities in the countryside by the sensitive, normally small-scale growth of existing business sites and premises.</p> <p>The policy accords with Policy EC3 by securing the effective use of employment land and premises by permitting the redevelopment of the land and facilitating access/environmental improvements. The continued employment use of the main part of the site is viable but the policy permits complementary enabling development as part of an overall scheme to make most effective use of the property for employment purposes by promoting affordable housing for the benefit of employees of the business.</p> <p>The policy accords with Policy TR3 as the development will help minimise the need to travel of some employees and will support good access to employment, services and community facilities, as well as ensure adequate, safe access arrangements.</p> <p>The policy accords with Policy EN1 by managing the high quality natural landscape character by ensuring the protection of the distinctive identified landscape character, ecological features and settlement pattern of the High Weald Area of Outstanding Natural Beauty.</p> |
| 5 | Sawmills | <p>The policy accords with saved Policy DS1 in seeking to make the best use of land through the reuse of previously developed land and buildings, by respecting the importance of the countryside (especially of the AONB) and by enabling the continuing supply of housing to meet local needs, but only where this will lead to securing economic development and an environmental improvement.</p> <p>The policy accords with saved Policy GD1 in being compatible with the conservation of the AONB and is not located in an area of flood risk or high agricultural value. The other provisions of GD1 (and its replacement) will continue to apply to a planning application.</p> <p>The policy does not accord with saved Policy HG2 as it does not provide for any affordable housing. However, the rationale for the policy, which justifies a departure, is provided by the economic and environmental benefits which</p> |

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| | | <p>accord with other saved policies. Evidence has been provided to establish this case and this policy requires that greater detail will be provided with a planning application.</p> <p>The policy accords with saved Policy TR2 as the scheme will not result in the loss of sustainable transport facilities. It is an established business use and there is evidence to indicate that the existing highway access can be improved.</p> <p>The policy accords with saved Policy EM1 as it provides for the redevelopment of a site outside development boundaries which does not detract from the character or appearance of the area as well as meeting general development considerations.</p> <p>The policy accords with saved Policy EM2 in that it is evident that there is no prospect of its continued use for business purposes without new investment that will be realized by the mixed-use scheme proposed.</p> <p>The policy accords with saved Policy EM10 by providing for tourist accommodation in the countryside as it would result in a significant improvement in the appearance of the existing site and may be an essential part of the mixed use scheme.</p> <p>The policy accords with Policy OSS4 of the RLPCS in that it is consistent with the spatial strategy established by Policy 1 and the capacity of existing infrastructure and services, and of any planned or necessary improvements to them. It will help meet the local need for affordable housing and will maintain the character and qualities of the landscape. It makes effective use of previously developed land and is deliverable given its land ownership and the viability of development. Finally, it supports the need for and access to employment opportunities at the Village.</p> <p>The policy accords with Policy OSS5 in that it meets the needs of future occupiers, including providing appropriate amenities, it does not unreasonably harm the amenities of adjoining properties; it respects and does not detract from the character and appearance of the locality; it is compatible with the existing use of adjacent land; and is of a density appropriate to its context, having due regard to the key design principles.</p> <p>The policy accords with Policy RA2 as the development will support local economic needs and maintains or improves the rural character, and supports rural employment opportunities in keeping with rural character. It will conserve the</p> |
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| | | <p>intrinsic value, locally distinctive rural character and landscape features of the countryside.</p> <p>The policy accords with Policy RA3 by supporting employment opportunities in the countryside by the sensitive, normally small-scale growth of existing business sites and premises.</p> <p>The policy accords with Policy EC3 by securing the effective use of employment and tourism land and premises by permitting the redevelopment of the land and facilitating access/environmental improvements. The continued employment use of part of the site is not viable so the policy permits complementary enabling development as part of an overall scheme to make most effective use of the property for employment and tourism purposes.</p> <p>The policy accords with Policy EC6 by encouraging tourism activities and facilities to increase the supply of quality serviced and self-catering accommodation.</p> <p>The policy accords with Policy LHN2 by not delivering affordable housing as it can be demonstrated that such a requirement would render otherwise suitable development unviable as the main purpose of the housing is to support business development, where job creation is a priority.</p> <p>The policy accords with Policy EN1 by managing the high quality natural landscape character by ensuring the protection of the distinctive identified landscape character, ecological features and settlement pattern of the High Weald Area of Outstanding Natural Beauty.</p> |
| 6 | Parish Church | <p>The policy accords with saved Policy DS1 by respecting the importance of the countryside (especially of the AONB) and by enabling the continuing supply of housing to meet local needs, but only where this will lead to securing community benefits.</p> <p>The policy accords with saved Policy GD1 in being compatible with the conservation of the AONB and is not located in an area of flood risk or high agricultural value. It is also considered that a development scheme should, in principle, be possible in this location without prejudicing the character, appearance or setting of heritage features. The other provisions of GD1 (and its replacement) will continue to apply to a planning application.</p> |

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| | | <p>The policy accords with saved Policy HG2 by making provision for primarily affordable homes outside the settlement boundary of Sedlescombe for those households with a local connection, whose housing needs cannot be met in the normal housing market. Although not immediately adjoining the settlement boundary, the site is in close proximity (walking distance) to the village and the policy requires that the scale and layout of development will be in keeping with the landscape and the scheme will achieve a satisfactory highway access. The site is adjacent to and opposite other existing housing development known as Sandrocks, so it is not isolated in the landscape.</p> <p>The policy accords with saved Policy CF1 in respect of providing for the greater use of the Church for community benefit. The site is well suited to this purpose and the policy provides for access and car parking improvements.</p> <p>The policy accords with saved Policy TR2 as the scheme will benefit from and improve existing footway and road links to the village and will not result in the loss of sustainable transport facilities. It also accords with saved Policy TR3 in seeking to improve highways safety by providing car parking for visitors to the Church, which currently relies on on-road parking that is on the opposite side of the road to the Church making access for young and old alike very difficult and potentially dangerous for users who have to cross in front of traffic travelling at 50mph. Parking takes place quite close to a sharp road bend and at the top of a small lane reducing road visibility.</p> <p>The policy accords with Policy OSS5 of the RLPCS in that it meets the needs of future occupiers, including providing appropriate amenities, it does not unreasonably harm the amenities of adjoining properties; it respects and does not detract from the character and appearance of the locality; it is compatible with the existing use of adjacent land; and is of a density appropriate to its context, having due regard to the key design principles.</p> <p>The policy accords with Policy CO1 by permitting improved community facilities in the church building which is an appropriate, established location that meets identified community needs.</p> <p>The policy accords with Policy LHN2 by delivering affordable housing in a Rural Area by exceeding its requirement for 40% on-site affordable housing on schemes of 5 dwellings or more.</p> <p>The policy accords with Policy EN2 by preserving the locally distinctive vernacular building forms and their settings, features, fabric and materials of the listed church building.</p> |
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| | | The policy accords with Policy EN1 by managing the high quality natural landscape character by ensuring the protection of the distinctive identified landscape character, ecological features and settlement pattern of the High Weald Area of Outstanding Natural Beauty. |
| 7 | Local Green Spaces | <p>There is no saved policy that corresponds to the provisions of this policy.</p> <p>The policy accords with Policy EN5 of the RLPCS by protecting biodiversity and green space to maintain and develop a district-wide network of green infrastructure where possible linking areas of natural green space.</p> <p>The policy accords with Policy EN1 by managing the high quality natural landscape character by ensuring the protection of the distinctive identified landscape character, ecological features and settlement pattern of the High Weald Area of Outstanding Natural Beauty.</p> |

5.3 The matter of assessing the conformity of the Neighbourhood Plan with the development plan is a planning judgement. In the circumstances in which the Neighbourhood Plan has been prepared this judgement has been challenging, with the District Council being wary that it may undermine the delivery of sustainable development in its particular approach to spatial planning. In the Pre Submission version, an alternative spatial strategy was proposed to deliver housing development in the parish to remain in conformity with the (albeit unadopted but imminent) Core Strategy. This was intended to demonstrate that although the Neighbourhood Plan had failed to identify sufficient suitable and acceptable housing sites on the edge of the village to achieve the provisions of the Core Strategy, the local community remained keen to be positive about development.

5.4 In the light of representations made on that version, notably from the District Council, it became clear that this approach was inadvertently misconceived. The submission version has therefore sought to directly address this matter by explicitly accepting that the Neighbourhood Plan does not seek to meet in full the housing supply provisions of the Core Strategy and therefore it only allocates one site on the edge of the village for housing development. Further, in not seeking to deliver a minimum of 35 new homes, the policies 3 – 6 are no longer phrased as site allocations with specific housing numbers. Instead, the policies focus on their primary purpose: to lower the planning risks to the point whereby owners and developers will invest in bringing forward planning applications to deliver a wide range of sustainable development benefits, which the local community is keen to see realised. There is therefore no alternative spatial strategy presented or justified. In any event, given the high costs of preparing the evidence to support planning applications in these circumstances it was never possible for the sites to provide sufficient evidence to support allocation policies with specific numbers other than at Sunningdale (Policy 2).

5.5 The consequence of this shift in approach is that decisions made on how the housing provisions of the Core Strategy will be achieved may be taken at a later date, once the Neighbourhood Plan is made and has been given the opportunity to shape development proposals. The Parish Council is confident from the work it has engaged in with the respective site owners that the market signals the Neighbourhood Plan sends will be responded to positively early in the plan period. It is also confident that the key development principles set out in each policy to ensure satisfactory schemes, can and will be met and evidenced in the planning applications. In which case, the Neighbourhood Plan will be delivering a number of houses that will exceed the expectations of the Core Strategy in terms of the supply of new homes in the District, albeit not as its primary purpose or in the way envisaged by the Core Strategy. It will also deliver significant rural employment, heritage and community facility benefits with long term value for the local community.

5.6 It is therefore most likely that the outcome will be no need for the first review of the Neighbourhood Plan to tackle an under-provision of development. However, given the nature of most of these policies there must be a contingency for that eventuality and the Neighbourhood Plan makes this clear in its monitoring arrangements and in the supporting text to Policy 1.

6. Compatibility with EU Legislation

6.1 The Neighbourhood Plan has regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights and complies with the Human Rights Act.

6.2 A screening opinion was issued by the District Council in January 2014 requiring that the Neighbourhood Plan should be prepared in accordance with EU Directive 2001/42 on strategic environmental assessment (SEA) as it may lead to significant environmental effects. A SEA scoping report was consulted on by the Parish Council with the statutory consultees in February/March 2014 and its framework of environmental objectives was used to inform the preparation of the Pre Submission Neighbourhood Plan in March/April 2014. A draft SEA report was published alongside the Pre Submission Neighbourhood Plan for consultation. A final SEA report is published alongside the Submission Neighbourhood Plan. The SEA has demonstrated that the policies of the Neighbourhood Plan will not lead to any significant environmental effects that cannot be avoided or mitigated by subsequent planning applications and consents.

6.3 No part of the Neighbourhood Area lies within a zone of influence of any Special Protection Area, a European designated nature site. There has therefore been no requirement for a Habitats Regulation Assessment report in accordance with the EU Habitats Regulations.

Basic Conditions Statement produced by Sedlescombe Parish Council
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