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28th May 2024

Rother District Council
Town Hall
Bexhill on Sea
East Sussex
TN39 3JX

BY EMAIL ONLY

Our reference: A19135

Dear Sir

REGULATION 18 ROTHER LOCAL PLAN CONSULTATION RESPONSE

Thank you for your invitation to comment on the above consultation. I write on behalf of our client Beech Estate who hold a controlling interest in land to the north-west of Battle. These representations comment on the councils housing strategy, allocations and findings of the HELAA.

The council's overall spatial development strategy identifies Battle as a location for growth and the existing and proposed allocations demonstrate as such. The council's regulation 18 Local plan also confirms that *'Rye and Battle will be the centre of clusters of settlements that collectively provide what most residents need for their daily lives. Rye and Battle will continue to be key transport and community hubs, with improved active and public transport, better connecting the cluster of settlements to the towns.* Bearing those comments in mind it is agreed that Battle is a suitable location for housing growth.

The strategy wording goes on to explain that the council will need to achieve a minimum of 5158 to 7287 dwellings at an average rate of 258-364 per year by the end of the plan period in 2040. The council notes in the explanatory text that the figures are presented as a range, with the lower figure representing the total of 'identified sites' (current allocations and sites with planning permission), and the upper figure presenting the identified sites plus the totally capacity of 'potential additional sites' (sites identified in the draft HELAA) as being potentially suitable, available, and achievable for development during the Local Plan Period. Having reviewed the HELAA assessment it is clear that the council has overlooked two sites in Battle which offer opportunities for sensitive housing growth.

Land west of Whitelands

The first site we wish to make representations on relates to land to the west of the property known as Whitelands (assigned HELAA reference BAT0075). The whole parcel of land extends to approximately 2.1 hectares and has access through a field gate that fronts onto North Trade Road in the south-western corner of the site. There is an existing hedgerow across the frontage of the site and the northern and western boundaries are adjacent to a parcel of Ancient Woodland. Whitelands a residential property lies to the east of the site. A ribbon of residential development that runs along the southern side of North Trade Road is present across most of the southern boundary to the site.

Under the HELAA entry the council lists the site as 'potentially available'. We wish to highlight that the land is available and deliverable in the short term. The site assessment describes the land as '*a field that sits in the countryside to the west of Battle*'. The land actually lies adjacent to a ribbon of residential development, and it is not considered inappropriate in those circumstances to promote the site for residential development. Whilst the site may have historic field boundaries, a sensitively designed residential development could easily and effectively retain those. The site is described as a meadow, but it was the landowner who distributed wildflower seed approximately 10 years ago which has led to the appearance of the site that we now see today. Historically the site is thus not a wildflower meadow. Whilst development would remove some of this habitat it is considered that the site could deliver biodiversity net gain so this should not prohibit development.

The council has identified Battle as a location where housing growth is acceptable and has gone on to promote several sites for allocation in the councils identified and additional allocations list potential for 485 dwellings as per figure 21. The council in its assessment of HELAA reference ID BAT0075 have referred to the site being in an unsustainable location for additional development. We strongly disagree with this assessment. There is a footpath opposite the site which provides walkable access to Battle in approx. 10 mins. Furthermore, the council granted planning permission for two dwellings on land adjoining the site at Whitelands and for development on the field parcel adjoining that to the east under application reference RR/2018/2666/P for 20 dwellings. Approval on these sites has brought the built form of Battle closer to this site and the HELAA does not adequately take account of that fact. A map is attached at **Appendix 1** showing the site in context with recent approvals. Land at HELAA reference ID BAT0075 has the same sustainability levels as both of those land parcels which adjoin, and which benefit from planning permission.

It should be noted that the site is enclosed from the wider countryside to the north and AONB views by woodland. Residential development could be accommodated whilst providing ample Ancient Woodland buffers. The Local Plan should consider extensions to the development boundary for Battle to include this land and allocate this land for residential development.

Land at Frederick Thatcher Place, North Trade Road, Battle

The second site we wish to make representations on relates to land at Frederick Thatcher Place, North Trade Road, Battle. This land has been considered under HELAA reference BAT0013. The site extends to approximately 0.67 hectares. The site does contain woodland however it is considered that a sensitively designed small-scale scheme could be achieved here whilst protecting and enhancing the woodland alongside achieving biodiversity net gain. The scheme could also be sensitively designed so to avoid harm to the setting of the adjacent Grade II building. Historically it should be recognised that the woodland that exists was in fact the orchard for Frederick Thatcher Place as shown on the historic mapping contained in Appendix 2.

The site is connected to the existing built-up area of Battle, highly sustainable and is suitable and available for allocation. There exist footpaths on both sides of the road immediately outside of the site which provides pedestrian routes to the centre of Battle. There also exists a bus stop outside of the site which provide services within Battle and also connect to Bexhill Town Centre. It should also be recognised that the council has approved numerous developments in the vicinity of this site and further westwards along North Trade Road. The following can be noted RR/2017/2390/P (25 dwellings), RR/2018/2666/P (20 dwellings) and RR/2021/1930/P (2 dwellings).

Yours faithfully

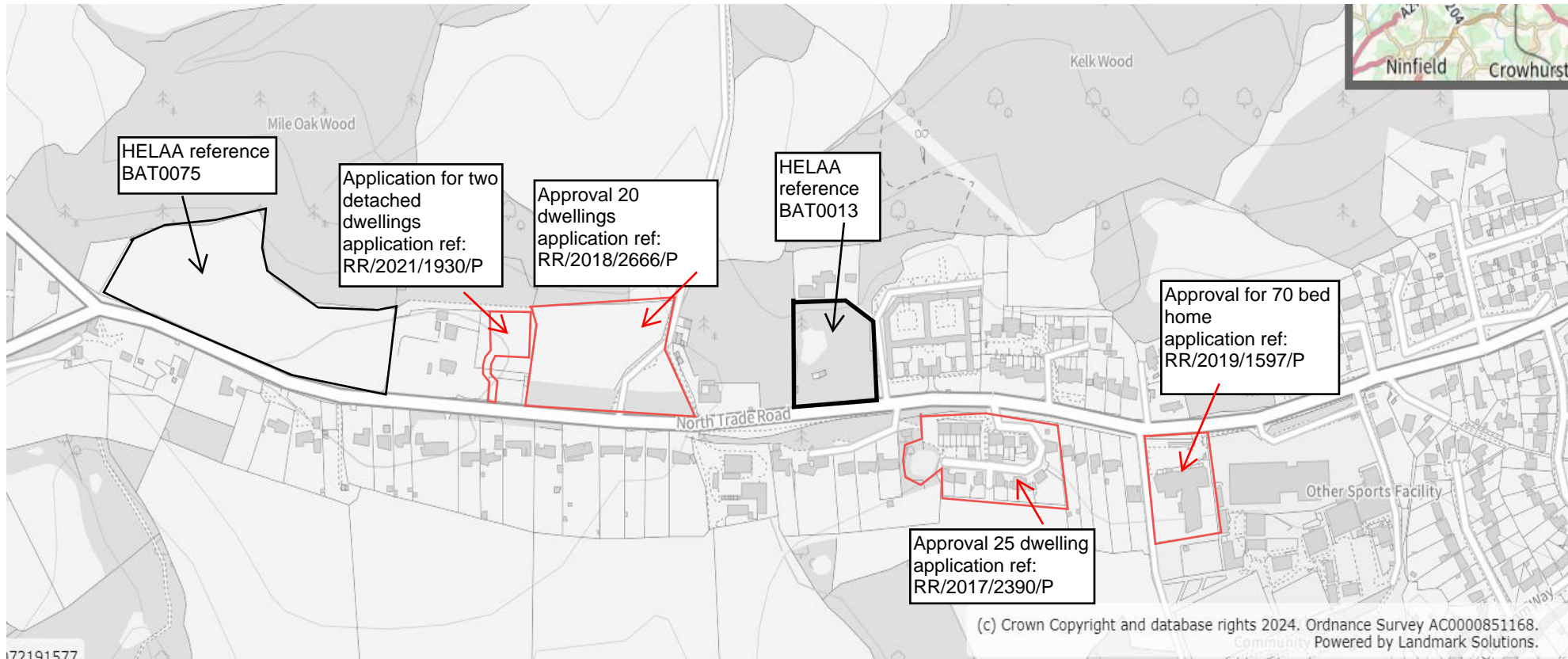


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APPENDIX 1

Sites in context with recent approvals



APPENDIX 2

Historic Mapping indicating orchard

Appendix 2 – 6 Inch OS Map of 1873 depicting Orchard.

