

RESPONSE TO ROTHER DRAFT LOCAL PLAN (APRIL 2024)

The content of this response is centred around the HEELA Site Assessments with reference to Catsfield but may have some overspill into other areas of the Plan. The Local Plan document is too vast and detailed to read thoroughly and make reasoned comments. Surely all recommended sites should be fully researched to justify their viability before inclusion in the Local Plan. Those suggested for Catsfield all have more than enough reasons to not be included, even at this stage.

My wife and I have lived in Catsfield since January 1997 so have a fairly good knowledge of the situation in the village and the recent planning application assaults of the last 4 years. We have had highly speculative hostile applications for 29 houses in The Brooks which is immediately adjacent to us and the massive Holiday Camp proposal on the Normanhurst Estate, both of which have been summarily dismissed by Rother Planning, for which we are grateful. Also, a similarly speculative infill house in the AONL opposite us (adj St. Kitts) was refused and the appeal dismissed.

General comments on the proposals and the infrastructure situation in Catsfield.

Catsfield cannot bear such a massive uplift of housing. The 60 houses will cause a property increase of nearly 50% (approx. 153 houses currently), with a national rural average of 2.4 people per house, that is an increase of nearly 150 people at a minimum, which is neither workable nor a fair imposition. The previous SHLAA clearly stated that the Wilton House site would create an unacceptable increase in the size of the village so how has that changed?

The Vision for Battle and Surrounding Settlements states:

Sensitive small-scale development will be delivered in villages surrounding Battle, at densities consistent with the surrounding area, where it is sustainable and does not negatively impact the setting of the High Weald NL. A small level of growth will help support improving the overall sustainability and vitality of the cluster of villages around Battle, through supporting existing services and facilities as well as delivering developer contributions for wider community benefit. This will ensure that health and wellbeing and community cohesion is maintained and improved.

Where are the proposals for Catsfield remotely relevant to this policy? It contravenes it in every respect, even with the existing site allocation for r/o the White Hart. No financial contribution from a developer would compensate for the damage to the village, the AONL or the existing traffic problems.

There is a minimal mobile phone signal, with no signal at all indoors in many properties or even outside at a sizeable number. There appears to be no prospect of any providers installing a local mast. Even with fibre broadband, because of our distance from the exchange, speeds are much limited compared to towns. If you can get it, 500Mb seems to be an absolute maximum and we will lose our landlines soon so will depend on our unreliable electricity supply.

The water supply is poor, with many days of low pressure a year, some supply cuts and long-term hosepipe bans being an almost annual event. South East Water objected to the Normanhurst proposal on the basis of insufficient mains water availability and rumours abound that the Ingrams Farm site in Ninfield has closed down because they can't be supplied with mains water. Imposing 60 new houses on Catsfield must have a similar problem, notwithstanding all the other houses being proposed within the area, both Rother and Wealden.

The HEELA assessment has managed to choose the three worst sites for flooding in the village. Catsfield village centre is a natural bowl and collects water from all sides so it has to find its way to The Brooks or Catsfield Stream so will naturally run through or to the lower areas.

The electricity supply is all overhead and fragile, with many cuts of various durations. This can only be made worse with such an increase in consumption. Gas is being phased out but there is no mains gas anyway – this will make electricity consumption worse due to the need for heat pumps, the noise from which is not really socially acceptable.

The Green is already acknowledged by ESCC Highways to be too busy and too fast and Church Road suffers from a similar but not yet tested problem so the increase in traffic entering and leaving the sites will increase the danger to drivers and pedestrians. Pavements are minimal and narrow, forcing pedestrians right to the kerb edge, increasing risk. Some aren't even wide enough for pushchairs or mobility scooters.

ESCC Highways seem to only carry out a box ticking exercise as, on every application, they seem to imply there are no problems yet the raft of objections from residents show that the current situation is reasonably dangerous in both locations, with many unrecorded near misses or light impacts. Using death or serious injury statistics is surely not the way to assess road safety.

According to gov.uk, each property would have an average of 2.4 occupants and a minimum of two cars but, assuming just the two drivers per household at 401 traffic movements per year, 60 houses would add the minimum of an extra 24,000 village centre traffic movements per year – how on earth is that sustainable?

Catsfield is a natural Dark Sky village and the recent development in Skinners Lane shows that this wish is being ignored already, with the new houses being virtually floodlit. We, as a village, do not want any more street lighting than we already have (which is deliberately minimal) but there seems to be pressure to install lighting in new developments, which would not be acceptable.

Catsfield School and the Catsfield Pre-school are both full already, with no prospect of enlargement and senior schools are in Battle or Bexhill, neither of which are accessible by cycle or public footpath. There are no local doctors or dentists and the bus service is very poor so every new resident (maybe up to 150 or more, depending on occupancy) will need to use cars on a daily basis. The document acknowledges that there are no work opportunities locally or any prospect so that will enforce commuting. Battle is in a sorry state and, other than the station, offers very few chances of employment.

Add in the substantial increase in traffic through the village from the various major developments in the local Wealden area and planned development in Battle, things can only get worse than they already are.

Cycling is not an option as all the roads are too dangerous, even for the hardest of committed cyclists.

This is a small village set in a linear development style so the inclusion of two housing estates (in the AONL by the way) behind the current houses is totally contradictory to the existing layout and would be completely out of character.

Following the recent r/o White Hart application, there seems to be some confusion over the availability of connection to the public foul sewer that runs down the village edge of this and the Wilton House Equestrian sites – why was that not utilised? Is it already at capacity so a treatment plant was required? All these open spaces or shared infrastructure facilities require proper management – who is going to be burdened with that? Surely not the Parish Council through the residents' Council Tax? That would be a huge insult to expect us to take on extra financial and maintenance responsibility as well.

There always seem to be subsequent applications by developers to remove various operational Planning Conditions, which rarely get any statutory publicity and then appear to get approved. The removal of ALL requirement for affordable housing for reasons of viability at the Blackfriars site in Battle is particularly alarming as, if a developer can't provide any affordable housing on such a huge site of 200 houses, nothing will be forthcoming in Catsfield as a precedent has now been set for anywhere in Rother.

Site specific comments.

CAT0029 – Church Road.

This has a personal effect and knowledge element to it as we live adjacent to The Brooks.

The St. Kitts refusal in 2021 states that infill opposite was not acceptable (albeit within the AONB/AONL) so a greater infill on the Brooks side is worse. This is a natural break in the gap between the village centre and the small settlement area around the school and Chequers Farm. Extending the ribbon development would be detrimental to the area, particularly the AONL.

While the rejection of the hostile application for 29 houses on The Brooks was hugely welcomed, many of the reasons for refusal have as much justification for the idea of a road frontage infill. Even statutory consultees generally raised serious concerns.

As implied in the Site Assessment, the whole field and the suggested section in particular are flooded every winter and have been for as long as we can remember. Church Road itself and all the 'ditches' in the field are designated as surface water flood areas – in heavy rainfall the whole width of Church Road from the school down to Pear Tree Cottage runs with water and much of that presumably leaches into the field. The proposed site (indeed, the whole field) is covered in a marsh grass, which reinforces the assertion of very wet conditions.

The whole of the 600 year old Ancient Hedgerow to the road frontage (according to Dr. John Feltwell, Catsfield Tree Warden) would be lost to create the required visibility splay due to the site being on the inside of a long curve. This loss is totally unacceptable. The gap in any replacement would expose the site to open view from the road and the AONL.

In the Draft Local Plan, Policy LAN2 refers to the loss of important hedgerows. As well as being an ancient hedgerow, it is of huge visual importance and creates the setting for its 'edge of village' location and would be a total loss as it cannot possibly be recreated in a set-back location.

Vehicular access was categorically NOT generally accepted. See earlier comments re ESCC Highways assessments. Church Road has too many speeding vehicles, excessive parking during school drop-off and collection, no pavement on the site side and the white line marked bays in front of drives which are also intended to act as passing bays on the long stretch of narrow road are blocked with parked vehicles at school run times twice a day, every day, with no apparent prospect of enforcement. At school drop off and pick up, the line of parked traffic is around 200m long and the road is reduced to a single vehicle width, on a blind curve and with two way traffic, including cars, trucks, huge tractors with equally large trailers and articulated lorries – this is why we get some level of gridlock most days, which, in turn, leads to our drives being used as cut throughs and waiting areas and, sadly, the school authorities shows absolutely no interest in getting parents to have respect for the local residents and other road users beyond the occasional note in a newsletter. It is almost inevitable that we would end up with yellow lines opposite the site to allow larger vehicles to enter and leave, which would still not be policed, leading to more problems. It would also unfairly push school parking further down Church Road and up Church Lane. Existing house owners have to hope for the best when leaving their drives due to the speed of traffic down this long curve, which has very poor visibility. Highways also failed to understand the difficulty of exit and entrance between Church Road and The Green, all of which were explained in detail on our submission to the Brooks application.

The ESCC Landscape Officer and others highlighted their concerns at the loss of continuation of open space and wildlife corridor between the Brooks and the AONL adjacent to St. Kitts. In fact, this idea would be worse as the whole width of the site is likely to be blocked both visually and practically (but see the following comment).

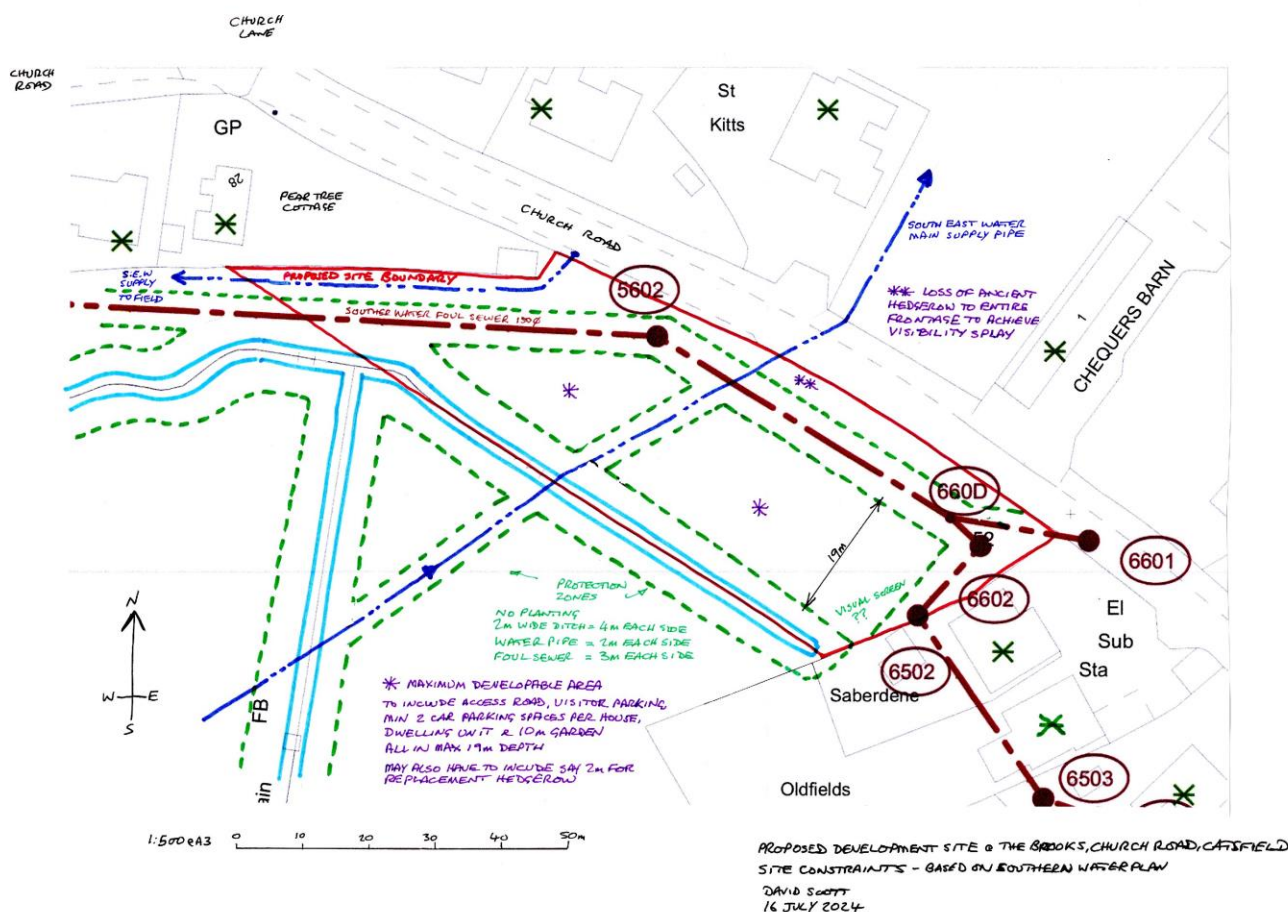
There are significant problems with buildable area of the site anyway – *see attached sketch plan*. Again, from the Brooks application, the ditch to the rear of the site should have a minimum 2m margin on either side to allow wildlife to keep access; the public foul sewer that runs behind the hedgerow has a statutory requirement for a free access 3m either side of the drain (presumably on open ground, not under the access road) and the South East Water main that runs right across the site requires at least 2m clear access either side.

The Skinners Lane development needed 40m from edge of access road to the depth of a 10m garden but there are only 35m from Church Road to the ditch before taking into account all the necessary access requirements and protection areas. Individual access for each property is not viable due to visibility, particularly at the Church Lane end, where there is a dangerous corner and junction.

Once all the statutory provisions are taken into account, the area for development (on this still very wet site) is massively reduced to the point of being virtually impossible, notwithstanding the visual loss of amenity. This would only leave a maximum of approximately 19m depth for the access road and turning areas, drives for at least two cars, 10m rear gardens, visitor parking and the actual house.

This doesn't account for any green screening space between the site and Pear Tree Cottage or Saberdene which would protect their amenity and outlook and for a wildlife route of what has historically been assumed as 10m, through from The Brooks to the AONL. The Brooks Field would surely also need its farm vehicle access retained.

Pear Tree Cottage and the former Methodist chapel are both Listed Buildings and their setting and amenity would be degraded by any development. Nearly all the properties in this specific area are bungalows or chalet bungalows but you can almost bet that any applications would be for 5 bedroom houses as there would be no affordable housing requirement and would be completely out of character, overwhelming and block the natural transition between the two pieces of land.



View of site from Brooks Field showing marsh grass.



View from Brooks Field through to AONL (will be lost)



Church Road looking east – ancient hedgerow and street scene – will be lost.



Church Road looking west – ancient hedgerow and street scene – will be lost.



Skinners Lane development shows similar impact on Church Road if developed.

CAT0001 – R/O White Hart land.

This site allocation was imposed on the village under the previous assessment, with effectively no right of response, so is widely unwanted by the villagers. It also encroaches into the AONL and blights the existing properties along the boundary.

Expanding on the assessment, there is a HUGE desire locally to reduce the number of dwellings. It should be noted that there was not a single local letter of support for the recent application, just two brief comments from outlying locations (Crowhurst and Bexhill) with no reasoning given.

The comments in this assessment are out of date as, since it was written, an application has been submitted for 35 houses but was recently withdrawn but with no published reasons. The contents of the claimed Pre-application advice have not been published either. Surely these should be public documents? A new assessment should be undertaken before any decision is made. If we are stuck with it as an allocated site, there is a general desire to have the allocation numbers drastically reduced.

Time has marched on and the world has changed dramatically since the previous Local Plan was produced. The extreme weather conditions we now experience were not really in existence and the rules to protect the flora and fauna have expanded, both of which bring far more limitations to the existing site allocation for the r/o White Hart site.

Dr John Feltwell (Catsfield Tree Warden and eminent ecologist) made a detailed submission on the recent application and the new TPO on the row of trees show that the 35 houses are not remotely achievable.

The objections received during the application process showed the numerous faults in the submission, lack of knowledge of the problems with the site and the real risks coming from introducing so much new traffic at a new road so close to all the other accesses. These comprise the 1066 Way track into Normanhurst, the Church Road junction, two bus stops, a zebra crossing (which in itself is incredibly dangerous due to the number of regular near-misses from speeding or overtaking motorists), the village shops and post office (with associated shopper and delivery truck parking) and the White Hart Inn traffic movements and on street parking when it is busy as well as narrow constricted pavements. The marginal achievement of a visibility splay that, at most times during the day, would be blocked with parked vehicles is worrying. Any hint of restricting parking that might affect the viability of the shop is totally unacceptable but would seem to be very likely should this new road and development be allowed.

See above re the infrastructure issues but, from the recent application, this should be coupled with the total lack of understanding by the applicants' agent of the site and the statutory requirements. The loss of the originally required open space to protect the Listed White Hart Inn, the tree screen to the houses at the along The Green, the ignorance of regulations relating to building on or near foul sewers etc and the disregard of where the excessive surface water will go (amazingly, actually into the Wilton House field that is also suggested as the proposed pond doesn't exist). This is despite the responses at the village public meeting held by the agents for an earlier proposal. The inevitable loss of a lot or even all of the Ancient Hedgerow between the site and the 1066 Way is also to be objected to as the need for visibility splays would be of great concern. Again, see Policy LAN2

CAT0016 – Wilton House Equestrian Centre land (actually part of the Normanhurst Estate).

This land is at the village end of the 1066 Way (a nationally important public footpath) and the pleasant rural introduction to walkers of a large open field used for horse grazing would be obliterated by any development. It would also have a severe detrimental impact on the AONL – the boundary was put there for a reason! This is probably the largest publicly visible open space in this area.

Every element of concern raised in the assessment comments are actual and relevant and are reason enough to delete the site from the availability individually. Water overflow from the r/o White Hart site is already considerable and uncontrolled (and uncontrollable) so could only be made worse by the development of that site, let alone this site. Both sites suffer from substantial flooding during the winter so covering huge swathes with buildings, roads etc can only make matters worse for the sites and surrounding areas.

Crossing the 1066 Way with a road is totally unacceptable, just as it was for the recently refused Normanhurst application - even though it is adjacent to the village, that doesn't excuse the idea. Would a crossroads be introduced or maybe even a roundabout? Would all traffic, including farm vehicles, horse riders and large delivery vehicles and existing residents be routed through the new estate roads?

Please see earlier general comments of traffic issues.

As for the r/o White Hart site, by the time a green screen and access provision to the public foul sewer have been provided, this site becomes way thinner than suggested but widening would include the sand school further up the track, effectively linking the current collection of private dwellings and farm buildings and causing an overpowering built entrance into the AONL and the estate.

General summary.

This excessive proposed imposition on Catsfield, irrespective that other villages have no allocation, is unfair and will have a substantial detrimental effect on the village itself and the amenity on the residents. Absolutely nothing has been proposed that would benefit the current residents or the village itself and let us cater for this influx.

The Village Hall, kindly provided by the Brassey family, so significant a feature of the village, isn't, even now, big enough to cope with recently increased village numbers at larger events (we can only accommodate 120 out of the around 900 Parish residents) so how are these extra numbers to be accommodated? Little thought appears to be given at how we are to cope with all this development or even how such awkward sites are to be accessed and serviced during the inevitably lengthy construction periods.

Please just see reason and maybe slot 6 or so discrete properties in the r/o White Hart site if there really is no alternative and look elsewhere in the District to spread the load.

Alongside all this, what effect do the new Labour government's ideas have on these allocations? They seem to be concentrating on Brownfield and Green Belt 'Grey Land' sites around major towns and cities, which is far more logical from every perspective, rather than ruining long standing attractive countryside and small villages, with no obvious compensations or benefits. Re-using empty or unused houses should also be drawn in before new homes are built.

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