

Comment to Public Consultaion on Rother new Local Plan.

I would like to comment in the public consultation on the new Rother Local Plan about the damage a housing development at Wakeham's Pond Field will do and therefore why it should be de-allocated in the new Local Plan.

There are many reasons for why people object to this site B1 being used for housing with an access road in open space B2 and along with support for the 2022 Appeal Inspector's findings re: the risk of groundwater flooding being too high (see attached five photos as examples of flooding throughout the winter of 2023/4) and that extra houses would make sewage pollution matters worse for Fairlight, Pett Level and the World Heritage wildlife RAMSAR site, the additional objection issues can be summarised thus:

(1) Harm from the housing in B1 to the protected High Weald 'Natural Landscape' (2) two storey dwellings uncharacteristic of the village (3) its isolation from the village, (4) pedestrian safety and urbanisation of Pett Level Rd, (5) effect on Dark Skies, (6) traffic increase and the chaos in narrow local lanes, (7) the existing lack of sustainable local services and poor transport links, (8) the effect on living conditions at [REDACTED], (9) the movement of vehicles along the site access road giving, 'a hard edge' to the development as seen from important public viewing points in the 'Natural Landscape' which breaks Rother's own Landscape rules.

It is points 8 and 9 that this comment paper concentrates on.

It is very important in helping democracy that the local plan process should be seen to be taking into account the number of voters who have written in favour of the de-allocation of Wakeham's Pond Field.

We all recognise that the country needs more housing but it needs to be of a type and place that fits and I will show that not only is the local Nimbyism well founded but there is an important wider aspect to the effect on the 'Natural Landscape' which has not been considered previously by statutory landscape consultees.

The effect on living conditions at [REDACTED]

The access road will create a loss of visual amenity and privacy, and the creation of noise and disturbance, and thereby create and increase harm [REDACTED], which will be considerable from vehicles and pedestrians who will look directly into the property, the garden, the patio, the open glass sitting room and the bedroom. This should be of concern to those drafting and deciding on the new local plan.

There will be a flat green open space between [REDACTED] the access road with its pedestrian walkways and this will not be good [REDACTED].

In reality, it is inevitable that the children and youth of this 'bubble' estate, cut-off from the village facilities like the recreation ground, and, unlikely to be able to use the "informal open space area" to the south of the estate because of the steepness of the site and the presence of the extensive attenuation ponds that will need to be fenced off for safety reasons, will use this green space [REDACTED] as a sporting, football knock-about area. This will increase the loss of visual amenity and privacy, while creating noise and disturbance [REDACTED], which will be considerable, making this flat green space a negative factor for them.

The High Weald Natural Landscape (HWNL)

The Wakeham's Farm site is in the High Weald Natural Landscape. The HWNL has, and is rightly meant to have, the highest level of protection in relation to landscape and scenic beauty. I refer you to paragraphs 172, 176 and 177 of the National Planning Policy Framework.

These NPPF paragraphs require great weight to be given to and the highest status of conserving and enhancing the landscape and scenic beauty of the HWNL.

I will show how a development with an access road in B2 will be intrusive and will detract from the carefully preserved, special character of the area, **particularly as the HWNL area B2 has a tranquility and openness without trees.**

I will point out the devastating effect that **the vehicle movements on the access road** within the open space area B2 will have on the view from the National Cycle Network on the historic road mentioned in the Domesday book of 1086 and the incredible views from the top of the sandstone Down, criss-crossed by public footpaths, one of which is the 160 mile Saxon Shore Way, an important tourist coastal path from Hastings to Gravesend.

There is a quite outstanding and unique 360 degree view from the Down (called viewpoint 8 at the 2022 Appeal Hearing). From views across to France in the south, sweeping west there is Fairlight cliff and the sea shore, and panning inland across the hillside bowl of Fairlight Cove with the houses hidden though occasionally poking through the trees and Ghylls, across to Fairlight church on the heights of Battery Hill, then plunging down, with the listed Marsham Farm house and separate iconic Sussex barn standing out serenely against the Pett/Friars Hill hidden settlement on the ridge beyond, is possibly one of the most tranquil, undisturbed and finest, wide open, long, though intimate, inland views that you will ever see. It is an important reason why this area is a crucial part of the High Weald Natural Landscape. The only way of fully appreciating this view is to climb the Down, as the 2022 Appeal Hearing Inspector did before stating that "The latter is a matter of great weight against the proposal" (paragraph 55, APP/u1430/W/21/3283287). **The only disturbance to that view will be the movement of vehicles along the proposed access road.**

It is important to be aware of a paragraph from the Rother District Council Development and Site Allocations Local Plan Landscape Assessment of Wakeham's Farm, Fairlight Cove, May 2018, called "Statement of significance" which is Appendix 6, to help appreciate what is it that defines the beauty of the HWNL. Quote:

"People value the scenic beauty of the landscape: its ancientness and sense of history around every corner enhanced by the rich array of appealing historic buildings and wonderful views. They appreciate the dark skies; enjoy the relative sense of tranquility and intimacy that this human scale landscape provides; the ability to get out and about through myriad public rights of ways and the opportunities to get close to nature." Unquote.

The view from the top of the Down (viewpoint 8) is uniquely beautiful and highly representative of that *"Statement of Significance"*. It is one which will be permanently ruined if a housing development with its access road in area B2 is permitted to go ahead on Wakeham's Farm Pond Field in area B1.

High Sensitivity of B2

I refer to Rother's 2018 Landscape report, in Appendix 4. Area B2: under the heading Sensitivity conclusions from which I give two short quotes:

Quote: *" The tranquillity and naturalness are also influenced by the presence of Pett Level Road."* unquote. Though this is true from the viewpoint 3 on this road at the top of a steep hill coming up from Stream Lane, where many cyclists, using the National Cycle Network, catch their breath on the verge and look into the B2 area, it is not true from the Down viewpoint 8 as the Pett Level road is hidden by trees overhanging the road, which again is typical of the intimate beauty of this area, and no vehicles can be seen on the road or across any part of the wide 360 degree view from viewpoint 8.

Secondly I quote: *" The open nature of the area (B2) and sloping topography does make it more sensitive to change. Historically the area has been open in nature and the field pattern would not appear to have changed much since the 1800s. **It would not be appropriate to introduce extensive areas of woodland or tree planting to mitigate proposed development in this open area of landscape.** The character of the area is of medium to high landscape character sensitivity. **The area is of high visual sensitivity due to the long views across the area from very sensitive key viewpoints in recreational areas of the AONB.**"* unquote, underlining and boldness is mine.

Should the movement of vehicles be taken into account when assessing landscape and visual impact? Let me quote from the 'planning bible':-

The Guidelines for landscape & visual Impact assessment (third edition) of the Landscape Institute & Institute of Environmental Management & Assessment says specifically about vehicle movements, among various other things:-

Quote: "Section 4.18 The aspects of the operational stage which may be most relevant to the Landscape & Visual Impact Assessment include:

- Access arrangements and traffic movements
- the noise and movement of vehicles in so far as they may affect perceptions of tranquility in the landscape. " Unquote.

I have taken photos (appendix 1 and attached) from the top of the hill coming up from Stream Lane (called viewpoint 3 at the Appeal Hearing) and viewpont 8 from the Down, of a rectangular white sheet, with 'Save the AONB' on it, erected on the fence [REDACTED] [REDACTED]. It's size is the equivalent of the side of a medium sized white van, 5m long by 2m high, proceeding along the proposed access road in the open area B2 before going through the opening in the GI buffer zone into the area B1, historically, locally known as "Pond Field".

These photos help one to imagine how 300 vehicle movements per day along the access road will disrupt the tranquility and intimacy of this human scale, highly sensitive, open landscape as seen from important public viewpoints 3 and 8.

The statutory landscape professional from East Sussex CC, having reduced their advice to non-statutory advice to Rother on this issue at the 2022 Appeal Hearing, required an increase of four metres to 24 metres of GI buffer zone to screen the proposed static houses within pond field (B1) to reduce a 'hard edge' to the settlement from the public viewpoints in the HWNL seen from across area B2.

"**tree planting**" should not be planted in area B2 according to Rother's own Landscape planning policy (see above) and thereby screening by trees of the movement of vehicles along the road would not only be ineffectual for many years but would be against Rother's own Landscape planning policy.

It is well accepted that movement catches the eye more than static obstruction.

The movement of vehicles along the access road will create an intrusive 'hard edge' to the settlement and reduce the tranquility and intimacy of this human scale, highly sensitive, open landscape of area B2 as seen from public viewpoints 3 and 8.

Appendix 1

View into B2 from viewpoint 3 on Pett Level Rd showing 5mx2m mock van



From Viewpoint 8 on the Down showing 5mx2m mock van





Flooding NW corner Pond Field
Oct 2023





Flooding in NE corner of
Pond Field April 2024



Flooding in central Pond Field

Oct 2023