

1. Introduction

The following notes record information, evidence and ideas related only to pages of the Rother Local Plan, Development Strategy and Site Allocations, Draft (Regulation 18) Version, January 2026. No comments are provided herein about the general policies that are inherent in the LP. The BT sites comments are in effect answers to consultation Q26. The GYP sites comments are in effect answers to consultation Q64. Some on-off cross references to other questions are noted, also.

Version 2: now includes NE1 and NE2, in effect answers to consultation Q39.

2. BT1: Glengorse & extended eastwards

Consultation Q26

Noted this site partly includes a NP allocated site (BA31a). Now given overall potential size there will be higher concerns about access to/from the Hastings Road. Western edge of the Glengorse Estate west block around the Telham Court area is adjacent to PRow Battle FP100, so visual amenity for walkers will be a high concern.

The Hastings Road access for the eastern area requires Highways layout coordination with the Blackfriars site access, via The Spinney – both sites potentially generating high correlated traffic volume access requirements.

Is there an implied dwelling(s) demolition impact south of the Hastings Road in respect of existing properties to achieve access?

3. BT2: Breadsell Farm

Consultation Q26

Development of this Breadsell Farm site whilst allocated a Battle code, since it just sits inside the parish eastern boundary is in all but name a St. Leonards/Hastings site for the dwellings access and infrastructure – even in effect forming a development of a Strategic gap.

The area is adjacent to PRow Battle FP71, so visual amenity for walkers will be a high concern and longer distance receptors on PRow Crowhurst FP21 must be considered.

Frankly for Battle this is not really relevant to the community.

4. BT3: Beech Farm

Consultation Q26

Beech Farm site with Planning Permission – no significant issues known, except concern about routing of PRow Battle FP18, which will lose its country visual amenity for the route within the development area. Previously argued by the land owner as acceptable, but not agreed by Ramblers to be acceptable, when an alternative route would provide far more apparently rural outlook. This is currently not mentioned, only saying “Provide links...”, which is not strong enough.

5. BT4: Caldbec Hill

Consultation Q26

This site has had some development since the NP designated it, so remaining availability needs to be checked to ensure no over development. Southern boundary with the Procession Field is an important hedge line that must be preserved fully.

6. BT5: Rutherfords Business Park

Consultation Q26

No known issues to comment.

7. BT6: Sunny Rise – North

Consultation Q26

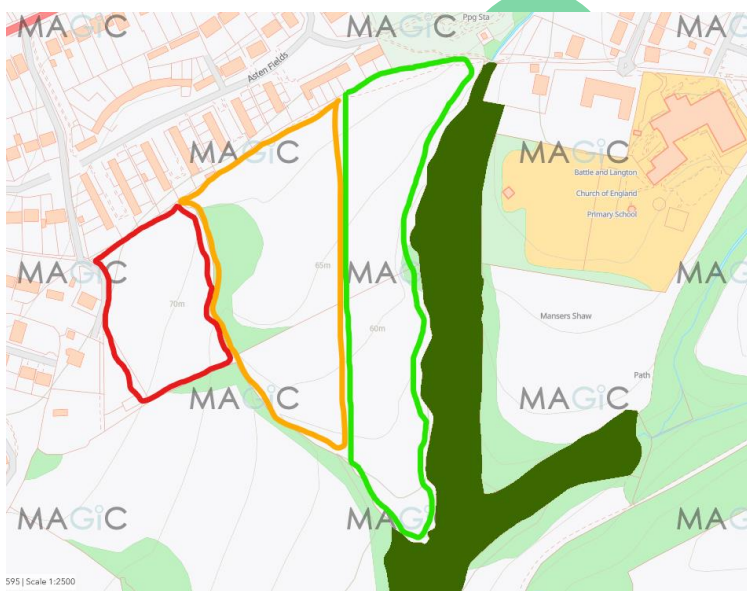
This site was considered for the NP but not included due to access concerns via Sunny Rise and its topology descending steeply northwards. Concern about proximity to designated Ancient Woodland, Kelk Wood, requiring significant buffer zone >50m.

8. BT7: Almonry Farm

Consultation Q26

Part of this site was considered for inclusion in the NP, but rejected mainly on grounds of access concern to/from North Trade Road.

New evidence has very recently come to light¹ that the eastern third of the proposed site is clearly part of the Mansers Shaw (a designated Ancient and Semi-Natural Woodland, shown in solid dark green) gill impact zone (green outlined – providing ~50m buffer), showing ancient land slippage towards the gill and now highly likely to be considered an important 'ancient meadow site' with a significant number of yellow-meadow-ant (*Lasius flavus*) mounds. Any hydrology change induced by housing development within a now newly proposed development-buffer zone (shown orange outlined) could have a potentially significant negative environmental impact, so only the western third of the site (red outlined - west of the narrow woodland/hedge strip) should remain for further development consideration. Nevertheless, the visual impact intrusion along the northern edge that housing would have on PRow Battle FP82 will have to be addressed.



[NOTE: It is observed that the policy: "maintain a buffer of at least 15m to protect the adjacent Ancient Woodland.", is referenced multiple times in the consultation. However, in some circumstances, exceptions beyond this limit may be warranted.

Furthermore, the Woodland Trust advocate a strong preference for 50m buffer zones in "Planning for Ancient Woodland, Planners' Manual for Ancient, Woodland and Veteran Trees, July 2019", see page 20. This advice includes the case study from King's Lynn & West Norfolk who adopted a 50m buffer zone within their Local Plan.]

9. BT8: Loose Farm cottages

Consultation Q26

This site was considered by the NP but not required, no issue with inclusion in the LP, indeed road/lane access already suitable.

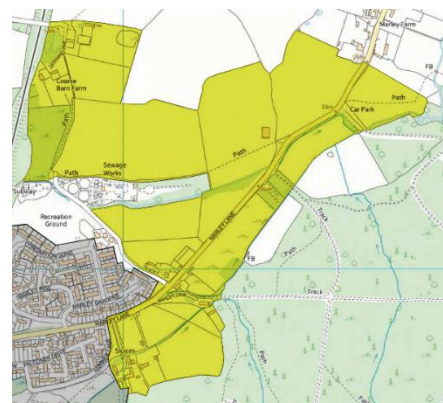
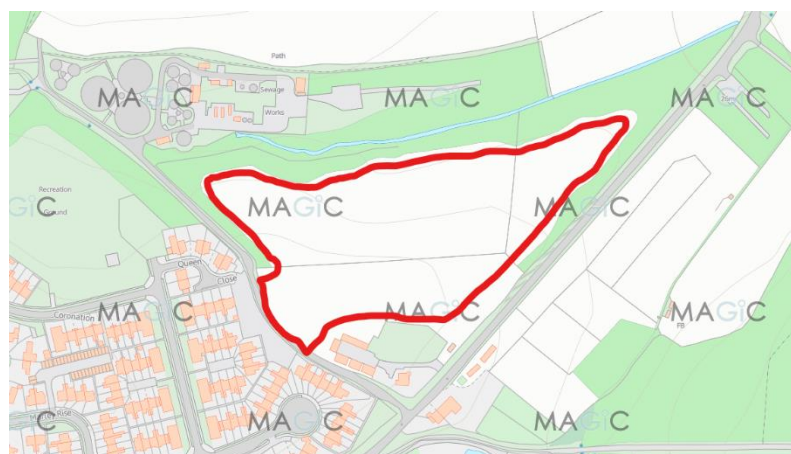
¹ Observations by B.MARKS on 2026-02-12, validated by Dr J Feltwell, Ecologist, as a likely correct observation, thus justifying a precautionary status until full professional survey.

10. BT9: Coronation Gardens extension east

Consultation Q26

This site was designated by the NP as a Green Gap (GG03) and includes an important dwelling² (UK's first retained female firefighter's early years Farm House home) on the southernmost corner of the treatment works access road (PRoW Battle BR109) and Marley Lane.

This BT9 site proposal's incursion into any (mapped) woodland is thus unacceptable. It might better be restricted to an area as shown by inner thick red line:



That smaller area, retaining all the existing green infrastructure of hedges and trees, would mitigate, to some extent, the loss of part of the NP Green Gap... But as a result of this proposed site allocation, a future NP may have to consider reinstatement of existing green infrastructure of hedges and trees

surrounding/within the Waste-water Treatment Works, particularly on its northern and eastern sides, that were requested to be removed from the original NP proposal.

Notably this site proposal highlights the lack of footway along Marley Lane from the site to Harrier Lane! (A potential shorter term BTC motivated prospective project.)

[For further information see NP Document: "Green Gap / Strategic Gap analysis (formerly titled Strategic Gap) Version 5.0 EXTRACT regarding GG03 detail]

11. BT10: Little Brans, land off Hastings Road

Consultation Q26

This site was considered by the NP but not thought suitable being so far from amenity infrastructure of Battle town.

12. BT11: Battle Market Square

Consultation Q3, Q12, Q26

This proposed site development entirely misses providing information of existing number of parking spaces and what potential loss of spaces may result?

Under "*Development Musts*", several items (e.g., 4, 5, 9) are already ideal, so the impact of any development must restore such infrastructure to current or better availability.

The proposed site information is lacking in an understanding being given about the location of the potential development suggested. The proposition that retail space will be created was not found to be a need in the NP investigations and furthermore retail to dwelling conversion PAs, since the NP was made, have been agreed by the LPA. Fig 21 (page 79) appears to suggest a conflict with this site proposal, showing: "Proposed new allocation = 0"?

² Historic connection requires verification

13. GYP1: High Views, Loose Farm

Consultation Q64

Existing site with adequate Hastings Road access.

14. GYP2: South of Hastings Road

Consultation Q64

Similar access to GYP 1. There needs to be consideration of a shared (GYP1 & GYP2) day-room structure, beside pitch numbers proposed.

15. GYP4: Land adjacent to Fir Tree Cottage, Netherfield Hill

Consultation Q64

The supporting text: *"This policy allocates an existing gypsy and traveller site, comprising two pitches, which currently benefits from a temporary planning permission."* is disingenuous, given the known Planning status of this site.

It has, after several retrospective Planning Applications only been given residential permission based upon specific residents declared status needs and not for any general traveller status; furthermore, for a limited temporary use until 2027-05-30, when quite rightly the site should be restored to "field" condition, given its proximity to Ashes Wood, (a designated Ancient Replanted and Semi-Natural Woodland).

The last Supporting text sentence: *"There is a level of development along Netherfield Road, and given the need for gypsy and traveller pitches in the district over the Plan period it is appropriate to retain this existing, currently temporary site through a permanent site allocation."* is not agreed to be appropriate for retention, especially because of the planning history evidence.

It should be noted that the most recent permission granted (RR/2025/1015/P), stated: *"The residential use of the site is not considered suitable on a permanent basis in this location due to the harm it causes to the landscape and scenic beauty of the High Weald National Landscape..."*

16. NE1: Swallow Barn, Netherfield

Consultation Q39

Whilst this site is an existing allocation in the Battle Neighbourhood Plan, given the dwelling density, it is unclear if the existing dwelling would need to be demolished, in order to accommodate the target of "10 new dwellings"?

17. NE2: Swallow Barn, Netherfield

Consultation Q39

It is good to note the condition required for new pedestrian and cycle links to Battle Road and more importantly via Swift Close.

Bev MARKS
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