

Rother Draft Local Plan Regulation 18b Consultation
Draft Policy BT8 - Land adjacent to 1 Loose Farm Cottages, Battle

1) Introduction

- 1.1 This Statement sets out grounds for objection to a potential housing site allocation under draft Policy BT8 of the draft Rother Local Plan. The draft Policy is for some 5 dwellings. The site is known as Land adjacent to 1 Loose Farm Cottages, Battle.
- 1.2 The draft allocation boundary is shown below. The site is positioned some 200 metres to the south west of Hastings Road between Battle and Hastings. It is located within a countryside location some 1.5 miles from Battle town centre.
- 1.3 The development grain in this location generally comprises linear development along Hastings Road, with some scattered and isolated development to the south west of the road. The land to the south west, south and south east of the site comprises open countryside within the High Weald National Landscape.
- 1.4 The site primarily comprises open fields, with small structures at the northern end. There is a small, shared access track linking the site to Hastings Road.



3D satellite view of the site looking south east © Google Earth



3D satellite view of the site looking south west © Google Earth



Aerial view showing the distance of the site from Battle



2) Draft Policy BT8

2.1 The supporting text for the draft allocation Policy BT8 is as follows:

The site comprises the northern section of a gently sloping field, to the south of ribbon development along Hastings Road and close to scattered development along the adjacent private lane, including cottages to the north and a residential care home and historic farmstead to the south, on the southern edge of Battle and within the High Weald National Landscape. Development of the site will impact on High Weald character features, however, having regard to existing residential development on Hastings Road, it is considered that a small-scale residential development can be accepted subject to a sensitive design. The site is located some distance from Battle town centre, however there is a bus service operating along Hastings Road ne

2.2 The draft Policy would allocate the site for some 5 dwellings. The policy criteria are outlined below.

1. *Provide a policy-compliant amount of on-site affordable housing in line with policy HOU2 of the Rother Local Plan*
2. *Include a new vehicular access from Hastings Road.*
3. *Include new pedestrian and cycle links to Hastings Road.*
4. *Establish a strong boundary hedge to form a visual buffer to the southern and western edges of the site.*

3) Grounds for the site to be removed from the draft Local Plan

3.1 This section sets out the material planning policy and other considerations which demonstrate that the site should not be allocated for five dwellings in the draft Local Plan.

3.2 A deliverable local plan can identify sites that are currently available, suitable, and have a realistic prospect of being developed within five years of adoption. Any sites that do not meet this criteria should not be included and should be removed.

i) Assessment of the criteria of draft Policy BT8

3.3 The draft Policy criteria are re-listed below, with comments beneath each in red. This analysis clearly demonstrates that the policy criteria cannot be met, meaning that the draft site allocation must be removed from the next Local Plan stage.

2. *Provide a policy-compliant amount of on-site affordable housing in line with policy HOU2 of the Rother Local Plan*

A policy-compliant affordable housing provision would amount to two dwellings. In the current market, this would almost certainly render the site unviable. Even if it were to be viable, it is highly unlikely that an affordable housing provider would take two units in this location. Therefore, there is no realistic prospect of the site being developed within five years of the draft Local Plan being adopted. On this basis, the draft allocation should be removed from the draft Local Plan.

3. *Include a new vehicular access from Hastings Road.*

This raises both deliverability and financial viability issues.

The access road does not allow two vehicles to pass each other, with some sections being around 3 metres wide. To create a suitable access, the existing track would need to be widened to at least 4.5 metres or a new alternative access would be required.

The access track linking the site to Hastings Road is under separate ownership to the allocation site. The land on either side of the access track is under several different ownerships. Therefore, is it not clear whether it will even be possible to obtain the necessary permissions construct a new or widened vehicular access road, either on or adjoining the existing access track. This is especially unlikely, as many of these landowners will not be supportive of this development.

Furthermore, the site is located some 200 metres from Hastings Road and therefore, a new access track would be extremely expensive and would again make the site financially unviable.

Indeed, the fact that a 200 metre new access road is required to support the development is a clear indication that this is not a suitable location for a new housing site allocation. A new metalled road which is at least 4.5 metres wide will result in significant landscape and visual harm which would not preserve the setting of the High Weald National Landscape.

On the related matter, even if a new access can be created it is highly unlikely that sufficient visibility splays can be achieved in both directions from the new access. As this section of Hastings Road has a speed limit of 40 MPH, a minimum visibility splay of 120 metres is required in both directions. Due to existing vegetation to the west and a telegraph pole and vegetation to the east which on third party land, there maximum visibility that can be achieved is around 35 – 40 metres in both directions. This is significantly short of the minimum requirements. This is further evidence that a suitable new access from Hastings Road can be provided.

Visibility to the east (primary carriageway) impeded by a telegraph pole and vegetation



Visibility to the west impeded by vegetation



On these bases, the site is not 'suitable' or 'deliverable'.

4. *Include new pedestrian and cycle links to Hastings Road.*

A separate pedestrian and cycle link would mean that the new access road would need to be at least 5.5 – 6 metres wide, or an alternative link would need to be created. This raises the same practicality and financial issues as above. It would also result in significant additional landscape harm via major engineering works.

On these bases, the site is not 'suitable' or 'deliverable'.

5. *Establish a strong boundary hedge to form a visual buffer to the southern and western edges of the site.*

The site is extremely open to the south, east and west and therefore, a new hedgerow would not mitigate the harm of new housing development.

- 3.4 Therefore, it is clear that a scheme on the site cannot be serviced or designed to adhere to all policy criteria listed above. Therefore, a future submission would not be remotely compliant with draft Policy BT8. Therefore, this allocation should be removed from the next stage of the draft Local Plan.

ii) Other planning considerations

- 3.5 As outlined above, the site comprises a very open and highly sensitive location within the High Weald National Landscape (see the photographs on page 2). The site is located beyond the linear development grain along Hastings Road and there is no meaningful built form surrounding the site itself. The site occupies a raised position which slopes away to the south. Therefore, a development of some 5 dwellings would result in demonstrable harm to the setting of the National Landscape. As outlined above, a new metalled access road is required to serve the development, which would result in further harm. The harm would be significant and sufficient for the site to be removed from the next stage of the draft Local Plan.
- 3.6 Furthermore, the proposed development density is 35 dwellings per hectare. This density would be more akin to an edge-of-town or suburban development, but this is far too high for a rural site of this nature. While it is not considered that this site is suitable for any form of housing, generally speaking a development in this setting should have a maximum density of 20 dwellings per hectare. If this density were to be applied to this site assessment, the total quantum of development would be less than 5 dwellings. This would make the site too small to be allocated for development. This represents a further reason for the site allocation to be removed from the next stage of the draft Local Plan.
- 3.7 This is a highly unsustainable location from an accessibility perspective. The site is not within walking or cycling distance of Battle (see the image on page 3), nor it within walking distance of any other meaningful services. The draft policy wording attaches weight to the bus services along Hastings Road. However, there are no bus stops within the proximity of the site. The closest bus stops are at Lilac Tree Lodge some 0.5 miles from the site. Most of this journey on foot would be via unlit pathways. As such, it isn't realistic that this service would be used on a day-to-day basis. Therefore, there would be almost a full reliance on the private car. This is further evidence that this is not a suitable location for a new housing allocation.

4. Summary

- 4.1 Therefore, the development of this site would create new housing in an unsustainable location and result in irreparable landscape harm upon the High Weald National Landscape. There is no evidence that a suitable form of access is achievable, given that consent would be required from several landowners who will not support the development. The cost of securing an appropriate access would be significant and render any development of this nature unviable. Even if a new access can be achieved, it is abundantly clear that sufficient visibility cannot be achieved in both directions from the new access point and therefore, the proposal would not be acceptable on highway safety grounds either.
- 4.2 Therefore, the site is not suitable and there is no evidence that the scheme would be deliverable.
- 4.3 Therefore, for the reasons stated the site should be removed from the next stage of the draft Local Plan.