Objections under the public consultation to the Proposed Site Allocation SG2 in Stonegate adjacent to the Bardown Road in the Emerging Rother Local plan 2025 - 2042

Name, address and the reasons for my objections

My name is Nicholas Davies, resident at [redacted]

My property in The Acorns and rear garden area immediately abuts the open southern field boundary of the proposed site allocation SG2. I and others abutting the site would be adversely and materially impacted by any such site allocation for development. I believe the proposed allocation fails to meet a number of Rother's own planning policy and criteria for inclusion and has failed to give sufficient weight to a number of site constraints on development or to the sustainability aspects of the proposed site allocation. I have not met a single person in Stonegate yet at any of the public consultations that supports the inclusion of this site.

Background Topography and Surrounding Site Context

The Acorns was designed and built in a traditional Kent/Sussex vernacular on a former brownfield site (a former plant hire yard) in 1988. It incorporated TPO'd trees, mature Oaks and was shaped around the retention of an existing historic natural pond at its centre. The Pond is a survivor of 4 ponds that once existed on The Acorns shown on the historic OS map survey of 1874. The density and layout of The Acorns was dictated by these constraints when it was designed, forming a soft and seamless transition into the open countryside to the north on much higher ground with open and permeable boundaries to the proposed site allocation SG2. This transition is successful because of the significant change in level in the site topography between the rear gardens of the easternmost properties in the Acorns and the land SG2 above. The land rises steadily eastwards on this boundary, so the difference between the field boundary level above and my immediate outside garden level below is 3.5 metres. At some time in history this dramatic change in level would have been created by activity for clay winning, mining or quarrying which is the pattern in the Weald as it is not a natural feature and would explain the existence of the many ponds that once existed here. When viewed from the field SG2 my property is sunk down by a storey and and a half into the landscape and so has little visual impact when viewed from the north. Viewed from the house however, the field is level with my first floor windows.The sudden change in level here is

maintained by terraced retaining walls and the steep tree'd embankment in the garden on my property. Any proposed development on the field adjacent could therefore look down into my private amenity space, dominate the skyline and reduce the vertical sky component (VSC) for daylighting that I have benefitted from for 28 years. Necessary higher fencing associated with securing the privacy of the open boundary from any future development would of course only exacerbate this. The preliminary landscape assessment and site description in the proposed allocation fails to acknowledge or pick up on any of the differing site topography on its southern boundary and perversely suggests development would be better suited here on the highest ground furthest from the proposed access on Bardown Road?

Proposed Density & Site Sustainability

The proposed density of 35 dwellings per hectare to generate 20 dwellings is not representative of the built density that prevails anywhere else in Stonegate. By Rother's own criteria higher densities in villages are justified in village centres in close proximity to public transport, shops and local services. This is not applicable here. Stonegate is not a service village. Curiously this density is applied to only half the site without any robust analysis to determine where that half might be other than a suggestion that it should be contained in the southern and eastern parts? Justification for higher densities by Rother's own criteria is within 1600 metres of stations or 800 metres of frequent bus services. We have no bus service in Stonegate and the station is 1.2 miles by road or 1930 metres to the closest possible site entry point on Bardown Road. Proposed development on the allocated site might therefore be over 2000 metres distant. It therefore fails this suitability test. Travel to the station is car dependant as the road access is rural and has no road markings, footway or lighting. Higher densities are most commonly found in the centres of historic settlements not on the edges.

I have read the Draft Site Density study parts 1 & 2 produced by Rother in 2024 & 2026 in support of higher densities for site allocations. Tellingly, none of the contemporary best practice development examples used to justify density assumptions are taken from a Kent or Sussex Rural Wealden context and appear largely urban in character. In addition, the Historic examples from villages in Sussex, whilst they might illustrate appropriate building typologies, fail to include any car parking analysis associated with them. I regard this omission as deeply flawed if used for comparison purposes with their contemporary examples. This is not a robust planning argument for higher densities on the edge of historic settlements. The proposed site is entirely car dependant and not sustainable.

Site Accessibility

The proposed site entrance on Bardown Road would be located outside the current village 30mph limit. Sight lines for this access might be as much as 2.4 metres (X) x 90 metres (Y) northwards depending on traffic surveys requiring large sections of the hedgerow abutting the highway to be removed. Whilst extending the 30mph limit northwards to include the proposed site might reduce the Y forward visibility distance to 43 metres in each direction, this would still result in a significant loss of hedgerow on the western boundary. The importance of retaining and reinforcing landscaping on this sensitive edge has however already been highlighted by Rother.

It would not even be possible to connect the proposed site to the local primary school by footway as there is no pavement to the Bardown Road nor the means of providing it at the junction pinch point at the centre of the village. There is insufficient Highways land width available at this location to provide this footpath connectivity without a traffic light controlled single carriageway.

Groundwater

One of the principal objections I have to this proposed site allocation is the profound impact it would have on the natural water supply to the pond in the Acorns which is its central feature and jointly owned by me with my neighbours Mr & Mrs Simmons in no 2. The pond, as previously noted, is historic. It derives its water supply from underground springs from the catchment area of the proposed site allocation, a protected Sandstone outcrop (a ‘Special to Sussex’ habitat) and partly within a source protection zone. Ground water from the proposed site allocation percolates through fissures in the clay and subsurface sandstone beds and runs down to the pond through the subsoil of our rear garden in land drains. This was evident when the pond was de-silted some years ago. The pond, even in severe periods of drought has never dried up, because it has this constant underground supply from the land above. When I first moved to the house the rear garden was not terraced and springs would often form on the bank in prolonged wet weather. These are now directed into the pond via land drainage that was installed when the garden was landscaped and terraced twenty years ago.

I believe that any proposed development would change and interrupt the water supply that derives from this site by altering the water table. The necessary groundworks for foundations, access roads and drainage associated with development would undoubtedly alter the subsurface hydrology of the field site and jeopardise the outflows from it. The water falling previously on open

land would be captured on new buildings and hard surfaces to be diverted away into surface water drainage systems. SUDs would not mitigate this as they are designed to capture and slow down rapid run-off into surface water systems. The pond as well as being a beautiful visual asset is a significant wildlife asset.

Landscape Significance and Bio-diversity

The proposed site is greenfield so I oppose its inclusion on principle. Prominent in the Wealden landscape it is located on the highest ground adjacent to the village built envelope. In the previous landscape assessment it was described by Rother as “visually exposed (with long views to the west only partially obscured by hedge) and of rural character”. The proposed access would result in the loss of hedgerow and the suggestion is that any development should be on the south and eastern sections of the site which are on the highest ground so by definition appearing above the hedgerow in long views from the west? Its development would be harmful to the surrounding landscape, hydrology and would result in the loss of habitat with negative impacts on the existing bio-diversity. Once lost this will never be regained.

The pond in The Acorns supports a prolific array of bird life, amphibians, aquatic life and insect life. In my time I have seen grass snakes, kingfishers and other rare species using it. In the summer we have many types of dragonflies which appear in the garden to feed from the pond. I have planted, maintained and improved it with my neighbours over more than twenty years. Its connectivity to the wider landscape through the permeable open boundaries to the north are the key for its survival and its importance for the bio-diversity we enjoy.

The dark sky environment with the mature trees on the proposed allocation site supports bat colonies who in turn feed at dusk from the prolific insect life on the pond. Owls and other small raptors predate rodents and small mammals on the field and roost in the trees at night with woodpeckers and many other species of birds benefitting from the existing mature trees and hedgerows. It is this landscape interconnectivity which is part of an holistic relationship with the proposed allocation site which provides these wildlife corridors through the permeable boundaries and is at risk of loss here. No amount of proposed nett gain on paper could ever compensate for the physical loss.

Whilst the High Weald AONB Management Plan has very well intentioned policies for dark sky mitigation, the reality is that a development located here and silhouetted at night on very much higher ground will be negative and harmful. Multiple lit windows after dark from a higher density development and light spill from outdoor security lighting cannot be avoided and in reality would not be enforced against by Rother once development is built.

Services & Adjoining Uses

The proposed site has three overhead high voltage cables owned by UKPN which cross the site from the northwest to the south east and roughly dissect the proposed site midway. The cables then only divert underground immediately on my easternmost rear boundary with the pole stays on my land. These would need to be placed underground across the site for any development to take place in their vicinity.

Despite living close to one of the largest reservoirs in the south east, ironically we still suffer from very low water pressure. I also understand the provision of surface water treatment for sewerage at the Stonegate site is at capacity already. The current infrastructure would not support additional dwellings without network reinforcement.

The small quarry site adjoining the north west boundary of the proposed site is used by a company for processing, crushing and loading aggregates. The noise from this process is sometimes obtrusive, sheltered as I am by the topography and at some distance in the landscape. It would however create an unsatisfactory adjacent planning use for any proposed residential development at higher level on the proposed site.

Archaeology

I note that Rother confirm, were this site ever to come forward it is recommended that an Archaeology report is prepared in relation to its proximity to the identified Bardown Roman ironworks site 300 metres to the North. (Mistakenly referred to as an Arachnological report in Rother's assessment - a typographic error I believe). As I have periodically turned up examples of iron bloomery deposits from my own garden embankment, I would support any such initiative.

Conclusions

When Site SG2 was excluded from development in the 2016 - 2028 Ticehurst Neighbourhood Plan it was for very good reasons, Nothing has changed since apart from increased pressure from central government to bring forward more sites. Officers drafting the emerging Draft Local Plan may feel under significant pressure to put forward the maximum number of sites knowing some on examination will fall away as unsuitable. I believe that a measured assessment of the suitability of this site taking into consideration all policy criteria would prove that to be the case here. I have set out above what I believe are very sound planning and policy reasons why this site should be excluded from the proposed site allocations and would urge Officers to relook at the criteria and justification behind this site. I hope they will reach the same conclusion as I and many others have after careful consideration of all the evidence.

Appendices - Photo’s for reference

No’s 3, 2 & 1 The Acorns viewed left to right from Field SG2

The rear of [redacted] viewed from Field edge

View from field edge down into [redacted] and the view out from first floor

Level change at rear of [redacted] up to SG2