

Planning Policy Team
Rother District Council
Town Hall
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TN39 3JX
(By email: draftlocalplan@rother.gov.uk)

Dear Sir / Madam

**ROTHER LOCAL PLAN 2025-2042 – DEVELOPMENT STRATEGY AND SITE ALLOCATIONS
DRAFT (REGULATION 18) VERSION JANUARY 2026 – PROPOSED SITE ALLOCATIONS
CONSULTATION**

We write on behalf of our client and landowner, Mr J Copp, to submit a representation to the Rother District Council (RDC) in response to the above consultation document, specifically in relation to proposed Site Allocation BT9 – Land east of Coronation Gardens, Battle ('the site').

The consultation period on this document closes on Monday 23rd March 2026.

The site was previously submitted via a Call for Sites to the Housing and Economic Land Availability Assessment, referred to as 'Land at Quarter Mile Farm, Marley Lane, Battle'. These representations concern the site, as identified in the draft HELAA Part 2 Site Assessments, referred to under the same name (ref. BAT0121) for c. 80 dwellings.

We welcome the identification of site under BAT0121 in the draft HELAA as being identified as potentially suitable for development and are supportive of the corresponding proposed draft allocation under BT9 in the Regulation 18 version of the Council's Local Plan 2025-2042.

We agree that this site should be considered as a site allocation given that it is suitable, available and achievable for housing development. This letter provides further comment on the content of the draft allocation.

Available, Achievable and Suitable

Draft allocation BT9 contains a parcel of land under single ownership of our client who can confirm that the land is available to come forward for development and achievable to come forward within 5 years.

The site is well contained, well connected to Battle, the railway station and existing amenities and services. It is adjacent to existing development and would provide an appropriate extension to the existing settlement



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of Battle. There are no known environmental or technical constraints that would prevent residential development coming forward on the site. The site is therefore clearly suitable for residential development.

Development Capacity

We are also supportive of the proposed indicative residential density as a minimum of 35 dwellings per hectare. The site's natural containment in addition to its location close to services, amenities and Battle Station provide an opportunity to explore an increased density whilst maintaining an appropriate character and pattern of development. Consideration should therefore be given to the potential for a higher indicative residential density where the site-specific development requirements can be met.

This can be achieved by maintaining flexibility in the wording of the site allocation given the recognition of the site's suitability for medium scale development. We recognise the draft allocation is worded appropriately as being allocation for residential development comprising some 75 new dwellings, based on an indicative capacity of 35 dwellings per hectare of 50% of the overall site area. Therefore, 75 homes should not be considered the upper limit, and the wording should reflect this to enable the site to be optimised by following a design-led approach, particularly given the release of this land as Greenfield land.

Site Specific Development Requirements

We set out our comments on the relevant parts of the site-specific development requirements. We note that these should repeat policy as set out elsewhere in the Local Plan provide design guidance principles of specific relevance to the site.

Part i. sets out the requirement to comply with HOU2. We question the need to repeat this as a site-specific requirement, as it would be a requirement regardless of any development to appropriately consider and address Policy HOU2 of the Local Plan.

Part iv. Sets out a requirement that the site must include new pedestrian and cycle links through to Coronation Gardens to the west. The site and Coronation Gardens are bisected by a third-party access road to the sewerage works which is a Public Right of Way. This enables future development of the site the opportunity for connection to Coronation Gardens. Therefore, we suggest the following amendments to part iv. wording to ensure inclusion and siting of pedestrian and cycle connections follow a design-led approach:

iv. Include new pedestrian links where possible to either Coronation Gardens, or attaching to the nearest pedestrian footpath alongside Marley Lane, opposite Harrier Lane.

Part v. currently refers to bringing forward open space in line with the ratios identified within BT9. However, we recommend that the wording is amended so that a design-led approach can inform the appropriate quantum of public open space for the northern part of the site. We suggest the wording is amended accordingly as follows:

v. Include an area of public open space across the northern part of the site.

Part vi. sets out the principle of retaining established hedgerows and trees to all boundaries with the exception of access. The wording should also recognise the principle of removals as being acceptable where it would be good arboricultural practice to do so if required.

Part vii. refers to a requirement to leave a minimum safe distance to the sewerage works located to the north-west of the site. Whilst we agree with the need to ensure a safe distance, the wording should be amended as follows:

vii. Leave a minimum safe distance to the sewerage works located to the north-west of the site, in consultation with the sewerage undertaker

Conclusion

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In summary, we are supportive of the site allocation and the aspiration for the site to deliver high-quality homes as a natural extension of Battle. The site is available, achievable and suitable for residential development.

As set out above, we consider the inclusion of amendments should be made to the draft allocation to ensure that the site is able to deliver the appropriate quantum of development to assist meeting housing need.

We consider that the Plan is 'sound' as per NPPF Para. 36, in respect of proposed draft allocation BT9, subject to the amendments suggested in this representation.

We look forward to confirmation of receipt of these representations.

Yours faithfully,

Jamie Sullivan

Partner

Enclosed: Consultation Response Form