

Rother District Council
Regulation 18 Consultation

Rurban Estates Limited

Policy Reference BT10 - Land adjoining Little Brans, Battle

MWB/HM/NK/37611

March 2026



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1 INTRODUCTION

1.1 OVERVIEW

- 1.1.1 This representation has been prepared on behalf of Rurban Estates Limited in response to Rother District Council's Regulation 18 consultation on the Draft Local Plan 2025-2042, which runs until 23rd March 2026.
- 1.1.2 Rother District Council ('RDC' or 'the Council') is preparing a new Local Plan to set out a strategy for development across the district for the period to 2042. Once adopted, the new Local Plan will update and replace Rother's Core Strategy (2014) and Development and Site Allocations (2019) Plans.
- 1.1.3 The consultation follows a previous Regulation 18 consultation on the draft Local Plan which took place in April 2024. The consultation sought views on the proposed development strategy, vision and objectives, along with policies on specific topic areas such as housing, economy, the environment, landscape, heritage, design and infrastructure. This Regulation 18 consultation now seeks views on the proposed site allocations which have been identified to deliver the updated spatial strategy and some area specific policies related to the options for strategic growth.
- 1.1.4 The purpose of this representation is to support the strategic growth identified for Battle and the inclusion of 'Land adjoining Little Brans, Battle' under draft Policy BT10. It seeks to comment on the scope of the draft policy and on the proposed spatial strategy more generally.
- 1.1.5 Rurban Estates Limited has control of all land covered by draft Policy BT10 and has been promoting the site for allocation as part of RDC's emerging Local Plan process since an initial Call for Sites submission in 2025.
- 1.1.6 In light of RDC's significant housing need, and in recognition of the proposed further expansion of Battle, land adjoining Little Brans is well placed to deliver a cohesive and landscape-led residential development opportunity which integrates open space and biodiversity enhancements whilst making a valuable contribution to the delivery of high-quality new homes. The development of this site will be consistent with the Council's preferred spatial options.

1.2 PLANNING POLICY FRAMEWORK

- 1.2.1 **Paragraph 15** states that the planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings.
- 1.2.2 **Paragraph 16** sets out that plans should: -
- (a) be prepared with the objective of contributing to the achievement of sustainable development;
 - (b) be prepared positively in a way that is aspirational but deliverable;
 - (c) be shaped by early, proportionate, and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

- (d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
- (e) be accessible through the use of digital tools to assist public involvement and policy presentation; and
- (f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in the NPPF where relevant).

1.2.3 **Paragraph 26** states that effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy.

1.2.4 In line with **Paragraph 36** for Plans to be found 'sound' final draft plans must be:

***Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*

***Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

***Effective** – deliverable over the Plan Period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*

***Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.*

1.3 STRUCTURE OF THE REPRESENTATION

1.3.1 **Section 1** of this report is an introduction to the plan context.

1.3.2 **Section 2** of this report introduces the site and its surrounding and explains why we consider it is a suitable location for planned growth, with reference to additional evidence available from the emerging applications.

1.3.3 **Section 3** responds to the draft consultation questions.

1.3.4 **Section 4** concludes the report and sets out why the site should be allocated within the draft local plan.

1.4 SUPPORTING DOCUMENTS

1.4.1 This Representation should be read in conjunction with the following submitted documents:

- 632-SK03 – Illustrative Masterplan (EDGE) (**Appendix 1**)
- 632-SK02 – Constraints and Opportunities Plan (EDGE) (**Appendix 2**)
- 632-SK01 – Facilities Plan (EDGE) (**Appendix 3**)
- Transport Technical Note (DHA Transport) (**Appendix 4**)

- Landscape and Visual Appraisal (LVA) (**Appendix 5**)

2 DELIVERABILITY OF LAND ADJOINING LITTLE BRANS, BATTLE

2.1 OVERVIEW

- 2.1.1 This representation reflects our client’s aspirations to develop ‘Land adjoining Little Brans, Battle’ (Site Reference Policy BT10) and seeks to demonstrate that it is deliverable. The site was assessed as Site Reference BAT0069 in RDC’s Strategic Housing and Economic Land Availability Assessment (HELAA) and comprises a parcel of land located to the rear of the existing line of development on the southern side of Hastings Road (A2100).
- 2.1.2 It should be noted that there has been a drafting error that has excluded a section of the field from the allocation boundary. This is shown in **Figure 2.1** with a dashed red line. The current allocation red line does not follow any natural boundary features and cuts across the field.
- 2.1.3 The vision for the site is to deliver a high quality, locally distinctive and sustainable addition to Battle. The new proposals will provide much needed housing, spacious public open spaces, recreation and play areas, enhanced areas of biodiversity and community infrastructure including new play space and recreational routes. A range of homes would be delivered, with a balance of tenures and sizes to meet local needs, whilst respecting the character of the local vernacular.
- 2.1.4 This representation is supported by Illustrative Masterplan and Constraints and Opportunities Plan contained at **Appendix 1** and **Appendix 2**, respectively. It should be noted that these show a development of approximately 80 homes on this site, which is a higher quantum of development than proposed in the draft allocation (65 homes), however the same principles can be applied for a reduced number of units. This is addressed further below.

2.2 SITE LOCATION AND DESCRIPTION

- 2.2.1 The proposed allocation comprises an approximately 5.75-hectare area of land to the south of the ribbon development along Hastings Road, as outlined in red in **Figure 2.1** below. The site abuts the existing development boundary, to the east of the linear historic market town of Battle.



FIGURE 2.1: SITE AERIAL SHOWING SURROUNDING CONTEXT (BASE MAP SOURCE: GOOGLE)

- 2.2.2 The site is irregularly shaped, principally made up of a field parcel and an existing access route to Hastings Road, along with an additional rectangular parcel of land which connects the site to Hastings Road approximately 19m to the south.
- 2.2.3 The field is characterised by agricultural grassland which is largely open. It is enclosed by well-established natural boundaries along the eastern and southern perimeter, made up of a treeline along the eastern boundary and an area of woodland ('Bushy Wood') to the south. The western boundary abuts the rear gardens of the dwellings along Hastings Road.

2.3 ACCESS

- 2.3.1 An existing access point into the site is available from Hastings Road, via a single-track lane that is shared with 122 and 126 Hastings Road. The lane, initially paved and then unsurfaced, leads to a field-gate.
- 2.3.2 The proposed vehicular access to the development would be achieved by way of a new priority junction with the A2100 Hastings Road, through the existing link-through located approximately 19m to the south. The technical note states that there are no significant foreseen issues with this proposed access but an independent Stage 1 Road Safety Audit will form part of any future application.
- 2.3.3 Pedestrian access to the site would be achievable from two separate points. A 2m wide footway will be located on the northern side of the vehicular access connecting to the existing pedestrian infrastructure of Hastings Road. The existing access will be retained and upgraded for pedestrians and cyclists only.
- 2.3.4 An uncontrolled pedestrian crossing will be provided approximately 50m to the north of the vehicular access, connecting with the existing footway on the eastern side of Hastings Road, which continues into Battle. In addition, the existing agricultural access to the site to the north will be upgraded to a shared footway / cycleway.
- 2.3.5 Hastings Road (A2100) is the principal route into Battle (approximately 0.9 miles to the north of the site) from the south of the settlement and connects the site to the town centre, and Hastings further to the south (northern edge of Hastings approximately 1.6 miles to the south of the site).
- 2.3.6 An initial trip generation assessment has been carried out, which concluded that the increase in the number of vehicle trips associated with the development of 65 units at the site, was not considered as severe. Measures are proposed to ensure that new residents are aware of the locally available public transport services.
- 2.3.7 Therefore, the proposed new access point, sustainable transport opportunities, and impact on highways should not be considered as constraints to the development.

Accessibility

- 2.3.8 Surfaced pavements are found along Hastings Road which lead northwards to the centre of Battle, including to Battle railway station, providing regular services to Hastings in the south and London Charing Cross. Further, approximately 35 metres along the northern access point, Lilac Tree Lodge bus stop is found. The bus stop provides regular services via bus route no. 95, 384 and 1066 to the centre of Battle, as well as to Bexhill and Hawkhurst. Southbound pavements link to the northern edge of Hastings, namely Baldslow.
- 2.3.9 It is therefore evident that the site - while located within a village settlement - is still sustainably located with the bus services available on Hastings Road surpassing many of those available in suburban areas of Rother District in terms of their availability during the evening and at weekends.

- 2.3.10 This submission is accompanied by a Transport Technical Note and three maps illustrating the accessibility of the site. These maps illustrate the time future residents will be able to access the necessary daily services by different pedestrian and public modes of transport. Additionally, Table 3 within the technical note provides a breakdown of individual times it takes to reach the key services and facilities in Battle, by different modes of transport modes. It is illustrated that each of these fall within an 11 minute bus ride of the site.

2.4 POLICY DESIGNATIONS AND SITE-SPECIFIC CONSIDERATIONS

Heritage

- 2.4.1 No heritage assets are located within or directly adjacent to the site. The nearest Listed Building is No.4 Loose Farm Cottages (listing ref: 1438900) which is located circa 165m to the south west. Approximately 230m to the south of Hastings Road, two further Grade II Listed buildings - Yew Tree building and Winter Hill - are found (ref. 1044208 and 1352860).
- 2.4.2 Battle is historic in character with a significant number of listed features and buildings along two central roads, High Street and Upper Lake. The site is approximately 1.5km east of this cluster of historic assets.
- 2.4.3 Given the substantial intervening vegetation between the site or built form between the site and the nearby listed buildings, the development would not result in an adverse impact on their setting. Further, given the distance from the conservation area within Battle, the site is not considered to make up part of the historic character of the town.
- 2.4.4 The site does not fall within an Archaeological Notification Area (ANA) as defined by the East Sussex County Council map for ANAs in East Sussex and Brighton & Hove.

Flood Risk/Drainage

- 2.4.5 The Environment Agency's Flood Map for Planning shows the site within Flood Zone 1, which means that the site is at low risk of flooding from nearby rivers and the sea. There are limited areas at risk of surface water flooding in the 1 in 30, 1 in 100 and 1 in 1000-year scenarios, as shown in **Figure 2.2**. This includes very small pockets of surface water flood risk at the two areas proposed for access. The access design will include drainage infrastructure in order to accommodate surface water flooding, leading to a potential betterment to adjoining properties.
- 2.4.6 A forthcoming application for the site will include a Flood Risk Assessment and Drainage Strategy. Where surface water flood risk is relatively limited in the site, the layout of the proposed development can be carefully considered to ensure no development over areas at risk of flooding.



FIGURE 2.2: EXTRACT OF THE DEFRA FLOOD MAP FOR PLANNING (SOURCE: DEFRA)

Environmental and Spatial Designations

Landscape

- 2.4.7 The proposed development site is located on the southern edge of Battle, in an area characterised by both rural landscape and ribbon development along Hastings Road. This ribbon development continues south along Telham Lane, and there are instances of development extending perpendicular to the road. The key landscape features within the site are found along the boundaries in the form of trees and hedgerows. The majority of the site is characterised by open grassland.
- 2.4.8 The site falls entirely within the High Weald National Landscape, a designation which covers 83% of the district. As part of the latest Call for Sites submission, a Landscape and Visual Appraisal (LVA) was carried out to assess the baseline characteristics of the site within this designated context and to determine the capacity of the site for future development. The report notes that the site's relationship to the dwellings on Hastings Road and concludes that any visual effects on views would primarily affect the site and its immediate surroundings, given the visual enclosure provided by its natural boundary features. It concludes that while the development of the site would result in inevitable changes to the landscape character and views to the site, as within any greenfield land, the site could accommodate landscape-led residential development provided that appropriate mitigation and enhancement measures are incorporated in the design.
- 2.4.9 The submitted Illustrative Layout demonstrates how the future development of the site could respond to the site's characteristics. The new homes have been positioned on the eastern part of the site which lies in the immediate context of existing dwellings on Hastings Road and therefore in a location with a reduced sense of rural tranquillity. The western part of the site is situated further from the settlement edge and is better placed for use as public open space. This design approach is a direct response to the landscape character of the site and will therefore reduce the impact on this part of the High Weald National Landscape.
- 2.4.10 It should be noted that all of the appropriate recommendations which can be implemented at this stage of the design process have been followed:
- Respect historic settlement patterns and local vernacular;
 - Preserve and enhance existing vegetation and ancient woodland;
 - Integrate green infrastructure and consider dark skies in lighting design;
 - Ensure development is visually contained and sympathetic to the High Weald character.
- 2.4.11 The Illustrative Layout sensitively incorporates the development into the edge of the settlement, by creating a natural progression from built form into the more tranquil and rural setting beyond.

Trees and Ecology

- 2.4.12 The southeastern boundary lies adjacent to Busy Woods, which is designated as Ancient Woodland as well as Priority Habitat (Deciduous Woodland). The submitted Illustrative Masterplan demonstrates how a development can be sensitively designed to accommodate the requisite 15m buffer zone around these areas, in line with Natural England's Standing Advice.
- 2.4.13 The development would achieve Biodiversity Net Gain through on-site enhancements as a priority, with off-site enhancements used for any residual loss and gains.

- 2.4.14 There are no Tree Preservation Orders (TPO) covering trees within or adjacent to the site.

Amenity

- 2.4.15 A key consideration to residential development would be potential impact on the dwellings along the northeastern boundary of the site. Due to the rear gardens backing onto the site, and existing vegetated boundary features, there are no concerns over the potential for overlooking, loss of privacy or impacts on daylight/sunlight.
- 2.4.16 There are no further noise generating uses surrounding the site, meaning that existing noise is not considered to be a constraint to the development.

2.5 AVAILABILITY AND ACHIEVABILITY

- 2.5.1 To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. By way of response, the site has no planning history of relevance or a history of unimplemented permissions that would alter the conclusions that it is now a suitable site. There are no identified impediments to the site being phased for potential development commencing within the 0 - 5 year period.
- 2.5.2 There are no physical limitations or problems such as access, infrastructure, flood risk, hazardous risks, pollution or contamination.
- 2.5.3 Availability is essentially about confirming that a site has been made available for development by the landowners, and that it is financially viable to develop. On behalf of the landowner we can confirm that there are no unexpected financial restrictions that would impact upon the viability of a housing scheme or that would prohibit development coming through within the early stages of the plan period. To the contrary, we consider there to be opportunity to deliver a high quality residential development.
- 2.5.4 The site is controlled by our client, a strategic land promoter, and is in single ownership. There are no complicated legal agreements or covenants that would prohibit the ability to bring forward the site early in the plan period.

2.6 ADJOINING LAND

- 2.6.1 It is understood that the smaller parcel of land adjoining the site to the south-west is now being promoted for residential development (Title ESX63983).
- 2.6.2 A review of the planning considerations addressed above has revealed that there would be no insurmountable constraints associated with the development of this parcel, with the main implication being the need to create an access through the hedgerow that currently separates the two parcels. The exact location of this link-through would be determined through arboricultural and ecological surveys at application stage.
- 2.6.3 The plan provided in **Figure 2.3** below demonstrates how the adjacent parcel could be designed into the illustrative scheme for BT10, with requisite buffer provided for the adjacent Ancient Woodland.



FIGURE 2.3 – SITE BT10 AND ADJOINING LAND TO THE SOUTH-WEST

3 RESPONSE TO CONSULTATION

3.1 OVERVIEW

- 3.1.1 This section provides a response to the consultation questions contained within the Consultation Document where they are of relevance to our client's interests.

3.2 RESPONSE TO QUESTIONS

Q1 - Do you have any comments on the amended Rother Local Plan Strategic Spatial Objectives shown in Figure 1?

- 3.2.1 We have no specific comments to make on the amendments made; however, we note that Spatial Objective 4 recognises the need to respond to the housing crisis and help facilitate the delivery of housing to meet the needs to different groups. This will be achieved by maximising the potential opportunities for residential development in sustainable and deliverable locations. We strongly support this objective, and it is encouraging that the Council specifically acknowledge the housing situation as a crisis.
- 3.2.2 As outlined within the consultation document, there is a need to identify enough sites to deliver a minimum of 912 homes per year. This target is not an arbitrary Government top-down target and instead is based on the Government's standard methodology and directly corresponds to the district's established population, affordability, and future needs. Accordingly, creating a place where the range of housing needs are being met in full, and improved, should be clearly explained to be a minimum requirement – it is the way it is achieved that should be subject to more open questions to the public.
- 3.2.3 We would suggest some minor modification to clarify that the plan is positively prepared and fully aligned with the provisions of the NPPF to make it clear that the plan as a minimum, seeks to meet the area's objectively assessed needs:
- "Respond to the housing crisis and help facilitate the delivery of housing to meet the needs of different groups in the community in full [...]"*
- 3.2.4 We are supportive of Spatial Objective 7 which seeks to focus growth in sustainable locations, or places that can be made sustainable through supporting infrastructure and community facilities.

Q2 - Do you have any comments on the Council's proposed housing target for the Local Plan of 8,427 dwellings over the 17-year plan period, or 495 dwellings annually?

- 3.2.5 The Council's housing supply components are consolidated in the table below. It is noted that the categories of supply have been revised since the 2024 consultation which make it clearer how sources of supply have been factored into the overall calculations. It is also noted that the number of homes identified as new and updated draft allocations has increased considerably since the April 2024 consultation, rising from 2,129 homes to 5,051 new homes. This brings the total housing figure for the Plan period accounting for all sources of supply to 8,427 homes over the 17-year Plan period, equating to a target of 495 homes annually.

SOURCE OF HOUSING SUPPLY	2026
Completions	To be included from 1 st April 2026
Committed Sites – Planning permissions (including resolutions to grant), permitted site allocations, permitted large windfall (non-allocated sites for 5 + dwellings), prior approval for 5 + dwellings, existing site allocations without planning consent	2,830
Windfall Sites – Small site allowance of 39 units annually, starting Year 4 of plan period	546
New / Updated Allocations – Existing site allocations without planning consent with revised capacity (residual figure), new site allocations without planning consent (as of 1 st April 2025).	5,051
Unmet need accommodated outside of Rother	0

- 3.2.6 This is recognised to be a considerable increase in potential housing supply when compared to the adopted Core Strategy figure (355 homes per year), which our client welcomes. However at the time of writing, the Government’s standard method figure for Rother sets a minimum target of 912 homes per annum, equating to a Plan period need of 15,504 homes. The Framework is clear that the standard method figure should be used to determine the minimum number of homes needed, along with any needs that cannot be met within neighbouring areas which should also be taken into account in establishing the amount of housing to be planned for.
- 3.2.7 In this regard, the Hastings & Rother Housing and Economic Development Needs Assessment (February 2024) identifies close ties with the neighbouring authorities of Wealden, Tunbridge Wells, Eastbourne and in particular, Hastings which is on the basis of comparatively strong links. They are concluded to form a self-contained housing and functional economic market area with Rother. All four neighbouring authorities are subject to significant constraints and have historically underdelivered on housing.
- 3.2.8 Notably, Hastings Borough Council is currently undertaking consultation on a new Local Plan Preferred Options Regulation 18 consultation which closes in April 2026. This consultation, following the undertaking of housing land availability evidence, indicates a new housing target of 3,141 to 3,373 homes for the Plan period based on land availability. By comparison, the standard method target equates to 12,546 homes.
- 3.2.9 Elsewhere, both the Eastbourne and Wealden Local Plans to 2042 are undergoing simultaneous Regulation 18 consultations within which the challenges associated with sustainably delivering 14,280 and 16,609 homes respectively are stated from the outset.
- 3.2.10 The Eastbourne Regulation 18 Plan proposes just 301 homes per year, compared to a target of 714 homes (approximately 42% of the standard method target), whilst the Wealden Regulation 18 Plan states that the Council does not currently consider that they can meet all of their development needs due to a lack of deliverable sites in sustainable locations.
- 3.2.11 In addition, the recently adopted Tunbridge Wells Local Plan 2038 fails to deliver its housing need in full, containing land only sufficient for the first 10 years of the Plan and is subject to an immediate review to identify housing for the remainder of the Plan period.
- 3.2.12 On account of the deeply concerning regional context, within which all four neighbouring authorities are struggling to meet even half of their housing requirement, it is vital that RDC explores whether it can accommodate the unmet need of neighbouring authorities

and in particular Hastings, to which Rother shares its housing and functional economic market area, in addition to meeting its own needs.

- 3.2.13 However, even without accounting for unmet needs from neighbouring authorities, at this stage the Local Plan would underdeliver annually by 417 homes, resulting in a shortfall of some 7,077 homes across the Plan period. This is even before a suggested minimum buffer of 5% for non-implementation is included, which would add a further 775 homes to the shortfall.
- 3.2.14 The Framework is clear that in order to be found sound, Plans should be 'positively prepared'. This means providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs and wherever possible, the unmet need from neighbouring areas.
- 3.2.15 The constraints within the District are fully acknowledged, however they are not unique to Rother and comprises principally the designation of much of the local authority area (83%) within the High Weald National Landscape. As the Council will be aware, whilst this invariably place additional expectations on new and particularly major developments, it is not prohibitive. The NPPF makes provision for major development (which itself is subjective and not necessarily development of more than 10 dwellings in accordance with the Town & Country Planning Act definition) in exceptional circumstances and where development is in the public interest. In this the context, the scale of the housing need and by the Council's own admission, the limited capacity of the non-National Landscape areas to accommodate the development needs, it is considered likely that exceptional circumstances exist to justify major development proposals within the National Landscape.
- 3.2.16 Such is the projected shortfall in the District, alongside the simultaneous shortfalls within the neighbouring authorities of Hastings, Wealden, Eastbourne and Tunbridge Wells, there is the potential for the major under-delivery of circa 50% in the housing market area for the foreseeable time horizons of the emerging Local Plans (circa fifteen years).
- 3.2.17 It cannot be underestimated the potential soundness risks that submitting the Plan with such a significant shortfall would present and we would cite the recent examination in Wiltshire, Horsham and Oxford in the last 24 months as examples of the challenges associated with submitting a Plan to examination that proposes to significantly under deliver against the standard method local housing need. Indeed, despite the Written Ministerial Statement (WMS) of 27 November 2025 effectively abolishing the Duty to Co-operate, Mid Sussex District Council has been pressed by the Inspector overseeing the Examination in Public to identify a significant number of additional sites to cater for unmet needs largely arising from Crawley and Brighton & Hove, on the basis that the WMS confirms that LPAs should "*continue to collaborate across their boundaries, including on unmet development needs from neighbouring areas,*"
- 3.2.18 Even should the Plan be found sound and successfully adopted, under the current Framework, Rother would be subject to a 20% buffer (effective six year supply) by virtue of paragraph 78(c) of the Framework, which is required for Plans whose annual average housing requirement is 80% or less of the most up to date local housing need figure using the standard method. At the time of writing, the Plan proposes just 54% of the standard method figure and in all likelihood would be subject to a 20% buffer on adoption.
- 3.2.19 At this stage of the process, the housing trajectory has not yet been published, however given historic supply and delivery in the District, it is in our view unlikely that the maintenance of a six year supply would be achievable and RDC's subsequent capability to resist speculative development, including in the National Landscape which the Council are rightly seeking to protect, would be severely diminished.
- 3.2.20 On account of all of the above, we strongly support our client's allocation, which must form a valuable component of RDC's deliverable supply. However, in the interests of ensuring a sound Plan, we strongly suggest that all draft allocation sites are appropriately

considered and in addition, further suitable sites are sourced as part of the relaunched and ongoing 'Call for Sites' exercise to ensure the submission of a sound Plan.

Q7 - Do you have any comments on the preferred approach for housing density shown in Figure 9, or on the updated Density Study (2026)?

- 3.2.21 The NPPF states that “*where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site” (emphasis added). While there should be greater emphasis on efficient use of land in the district, this must not compromise the need to deliver context-appropriate development or development that responds to local market demands.*
- 3.2.22 The 2024 consultation sought to divide Rother into five area types, each tailored with density expectations as defined by the Density Study (2024). Since the 2024 consultation, RDC has further examined whether these density expectations are appropriate, having regard to the need to optimise the use of land and maximise housing delivery, with reference to an updated Density Study (2026). Within this context, the 2026 consultation presents three options (Options A-C) for housing density, framed as:
- a) Option A - 'Business as Usual' - reflects density levels based on the adopted Development and Site Allocation Local Plan.
 - b) Option B - 'Higher Density' - higher density with a significant uplift in development density (compared to the baseline). Live Well Locally areas are given a density of 40dph, comprising 'low-rise development at the mid-range of medium density, located on the urban edge.'
 - c) Option C - 'Higher Density Plus' - higher density with a significant uplift in development density (compared to the baseline). Live Well Locally areas are given a density of 50dph, comprising 'low-rise development at the higher range of medium density, located on the urban edge.'
- 3.2.23 RDC's preferred approach is Option B, with the recommended target density range of 45-75 dph for suburban areas in Battle (amongst others). Whilst we support the efficient use of land and higher densities where appropriate, the policy wording should not be overly prescriptive to ensure that individual site characteristics are appropriately considered, as noted in paragraph 5.25 of the consultation document. It is recognised that there will be opportunities where higher densities will be appropriate but equally it can be necessary to incorporate lower densities at settlement edges to provide a sensitive transition to the open countryside beyond, particularly in protected landscapes like the High Weald where landscape-led development is even more important.
- 3.2.24 The policy should be clear that the density should relate to the developed area only, rather than the wider site, as this would have considerable implications on the landscape impacts of development and compliance with policies which seek to protect the special characteristics of protected landscapes. This is the approach taken with the allocation policies – which established a target density of 30dph for Site BT10 – and the policies should be aligned accordingly.
- 3.2.25 The landscape evidence submitted with this representation demonstrates that the site is deliverable in such a way that contributes to RDC's housing land supply without unacceptable impacts on the National Landscape. It is vital that the density policy is not too onerous to prevent development coming forward in line with adopted policy.

Q8 - Do you have any comments on the Council's proposed Overall Development Strategy?

- 3.2.26 Our client is supportive in principle of the overall development strategy, which recognises the unavoidable need to utilise land within the High Weald National Landscape to deliver the quantum of homes required across the Plan period. This is further demonstrated by the recognised shortfall of housing land in consultation document, even with the identified site allocations and the potential need to accommodate some of the unmet needs of neighbouring districts.
- 3.2.27 The NPPF states that major development should only be permitted in National Landscapes in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Whether a proposal is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined. A similar assessment is contained within the emerging NPPF.
- 3.2.28 It is recognised that while the proposed site allocations have been assessed against their impact on the National Landscape through the HELAA, which is supported and necessary to identify the potential land supply, further assessment will be required to inform the final site allocations and policy requirements. Given the high bar of protection placed upon the National Landscape, in balance with the considerable and demonstrable need for new housing on land within the National Landscape over the Plan period, it is vital that a dedicated topic paper is produced at the earliest opportunity to demonstrate alignment with the NPPF and, importantly, the exceptional circumstances that justifies the allocation of sites within the National Landscape boundary.
- 3.2.29 For the reasons set out in Section 2, and with reference to the submitted Landscape and Visual Appraisal, it is clear that there are opportunities for the development of land within the boundaries of the National Landscape, in such a way that is both appropriate to its designation and in locations that are influenced to a degree by existing settlement.
- 3.2.30 We also welcome the inclusion of Battle in the settlement hierarchy, which acknowledges the role of the settlement as a key transport and community hub in this part of the district. The settlement also lies in proximity to the Borough of Hastings. The development of land here will contribute to the district's own housing need but aligns with the recognition that there are inherent linkages in the housing market in this area, as set out in the joint Housing and Economic Development Assessment (HEDNA) prepared by the Council and Hastings Borough Council.
- 3.2.31 For the reasons set out in relation to Question 2, we have residual concerns that it is not a sufficiently ambitious strategy that will be effective in delivering a positively prepared plan. We do question the validity of the Interim Sustainability Appraisal Report (January 2026) which scores the proposed development strategy the highest score '++' against objective 8 for the delivery of homes. This appears generous given the proposed strategy would deliver just 52% of the housing need.
- 3.2.32 By way of remedy and to ensure the safe passage of the Plan through examination, we would strongly suggest that the development strategy is revisited to further emphasise the intensification of existing urban opportunities and expand the scope for development within the National Landscapes which is inevitably going to be required if RDC are to more closely align with the standard method local housing need.

Q9 - Do you have any comments on the proposed growth opportunities in the sub-areas as shown in Figure 10?

- 3.2.33 Notwithstanding our comments on housing need, we are supportive of the overall strategy of allocating a portion of homes to Battle. This is appropriate to the scale and location of

the settlement, whilst recognising the need for sensitive development within the boundaries of the High Weald National Landscape.

Q12 - Do you have any comments on the proposed Vision and development strategy for Battle and Surrounding Settlements, including the development figures shown in Figures 20 and 21?

3.2.34 We support the general aims of the Vision and development strategy for Battle.

Q36 - Do you have any comments on the proposed site allocations in Battle, detailed in Policies BT1 to BT11?

3.2.35 We strongly support the inclusion of Policy BT10 relating to the development of land adjoining Little Brans, Battle, for the reasons outlined in Section 2. However as previously noted, the extent of the allocation boundary does not accurately reflect the extent of the field and should be updated to reflect the extent of site outlined by this representation. The current boundary does not follow any natural boundary features and cuts across the field. It may also be extended to include the land being promoted to the south west, which can be incorporated into the wider masterplan for BT10.

3.2.36 The site promoters have undertaken initial technical due diligence to inform a masterplanning exercise to determine the site's opportunities and constraints and potential development capacity. This has established the following principles for the Illustrative Masterplan:

- Vehicular Access to be provided via Hastings Road A2100, with an additional separate pedestrian only access also provided;
- Significant landscape buffers are to be provided to the Ancient Woodland (Bushy Wood) to southern and eastern boundaries; the residential development will be setback, adjoining to the existing settlement boundary, providing at least a 15m buffer from the Ancient Woodland boundary;
- Retention of existing landscaping, including perimeter trees and hedgerow;
- Delivery of 35% affordable housing, providing 28 affordable dwellings in line with policy LHN2 from Rother's adopted Local Plan – Core Strategy (2014).
- Additional infrastructure such as significant open space allowing for a proposed play area (LEAP) and recreational routes, proposed cycle hire hub, and enhanced woodland expansion.

3.2.37 The submitted Illustrative Masterplan demonstrates how the development of at least 65 homes could be accommodated on the site. However using the indicated development density of 30dph, the site has the potential to accommodate at least 70 units using the net developable area shown on the Constraints and Opportunities plan. There is also potential to achieve at least 75 dwellings, at the indicated 30dph, by refining the net developable area without development parcels encroaching further away from the settlement edge and impacting the conclusions made on the National Landscape.

3.2.38 With the inclusion of the field being promoted to the south-west, and based on a net developable area of 0.3ha, there is potential for the capacity of BT10 to be further increased by some 10 homes.

3.2.39 A review of the draft policy wording has been undertaken in the table below.

DRAFT POLICY WORDING	RESPONSE
<p><i>i. Provide a policy-compliant amount of on-site affordable housing in line with policy HOU2 of the Rother Local Plan.</i></p>	<p>No comment.</p>
<p><i>ii. Be informed by a landscape sensitivity assessment to determine an appropriate layout, form and detailed design to ensure the conservation and enhancement of the landscape and character of the High Weald National Landscape.</i></p>	<p>The Illustrative Masterplan has been informed by specialist landscape advice from the outset. Further technical work will be undertaken as part of a future planning application.</p> <p>While it is possible to deliver a landscape-led development for this site, there will inevitably be a localised impact on the National Landscape. As such we request that the wording is revised to state:</p> <p><i>"...Be informed by a landscape sensitivity assessment to determine an appropriate layout, form and detailed design in recognition of the site's location within the High Weald National Landscape."</i></p>
<p><i>iii. Include a new vehicular access from Hastings Road.</i></p>	<p>The Illustrative Masterplan and Transport Technical Note demonstrate that this can be achieved.</p>
<p><i>iv. Include new pedestrian and cycle links to Hastings Road.</i></p>	<p>The Illustrative Masterplan and Transport Technical Note demonstrate that this can be achieved.</p>
<p><i>v. Include off-site pedestrian infrastructure as required by the Highway Authority (which could include new pedestrian footways and/ or a crossing point on Hastings Road).</i></p>	<p>The proposed access will be designed to connect with existing pedestrian infrastructure of Hastings Road.</p> <p>An uncontrolled pedestrian crossing will be provided approximately 50m to the north of the vehicular access, connecting with the existing footway on the eastern side of Hastings Road, which continues into Battle. In addition, the existing agricultural access to the site to the north will be upgraded to a shared footway / cycleway.</p>
<p><i>vi. Include areas of public open space across the south-western part of the site in line with the ratios indicated above.</i></p>	<p>Please refer to our comments made in paragraph 3.2.20 and 3.2.21 above.</p>
<p><i>vii. Retain the established hedgerows and trees to all boundaries of the site.</i></p>	<p>The submitted Illustrative Masterplan shows that this can be achieved, however, to facilitate access into the site, it is requested that the policy is worded as follows:</p>

DRAFT POLICY WORDING	RESPONSE
	<p><i>"Retain the established hedgerows and trees to all boundaries of the site, <u>other than removals required for the creation of the access</u>"</i></p>
<p><i>viii. Retain a suitable undeveloped buffer area to the designated priority habitat adjacent to the southern boundary of the site.</i></p>	<p>This can be achieved as part of the mitigation for the Ancient Woodland designation.</p>
<p><i>ix. Include provision for the retention and future management of a buffer zone of semi natural habitat, at least 15 metres wide (which does not include residential gardens), on the southern boundary, between the edge of development and the ancient woodland.</i></p>	<p>This policy must continue to be aligned with Natural England's Standing Advice of 15m.</p>
<p><i>x. Be carried out in accordance with the recommendations contained within a Flood Risk Assessment and avoid built development in the areas at risk of surface water flooding.</i></p>	<p>The submitted Illustrative Masterplan shows that this can be achieved through the positioning of homes. To ensure sufficient flexibility for the development of this site, we request that this policy is reworded to state:</p> <p><i>"avoid built development new homes..."</i></p>
<p><i>xi. Include sustainable drainage throughout the site in accordance with Policy ENV2 of the Rother Local Plan</i></p>	<p>No comment.</p>

Q68 - Do you have any comments on the Interim Sustainability Appraisal in support of the Regulation 18 stage consultation on the Development Strategy and Site Allocations (January 2026)?

3.2.40 The Interim Sustainability Appraisal (SA) provides an assessment of the proposed options for growth, including the sites identified for allocation. The SA scores the proposed allocations against the objectives of the emerging Local Plan, with reference to SA indicators for more specific assessment under each objective.

3.2.41 The following scoring metric is used in the assessment of these indicators:

++	Significant Positive
+	Minor Positive
0	Neutral or Uncertain
-	Minor Negative
--	Significant Negative

3.2.42 We make the following general observations on the assessment methodology, where it relates to matters that can be addressed through detailed design. We urge the Council to

consider revising the assessment methodology to ensure that suitable sites are not prematurely discounted given the considerable need for housing in the district.

- **2b** scores any site adjacent to Ancient Woodland as having a 'minor negative' effect. This disproportionately affects the assessment of sites that can suitably accommodate the required ancient woodland buffer within a development proposal. Similar comments can be made on **2d** which refers to priority habitat.
- **5b** scores any site with land at high risk of surface water flooding as having a 'significant adverse' effect. As above, it is possible design around, and in many cases improve, this risk through technical drainage design.
- **7b** scores any site not within 400m of a public open space of any type as a 'minor negative'. This unnecessarily affects the assessment of sites that look to suitably accommodate public open space needs within their scheme.
- **15a** gives a 'significant adverse effect' to any development in the National Landscape, however it is clear that the level of effects will vary depending on the characteristics of the site. We request that the 'minor negative' scoring is also given to sites in the National Landscape that could be sensitively developed.

3.2.43 The table below provides our assessment of Site BT10 with reference to the sustainability indicators and assessment criteria.

INDICATORS	SI RESPONSE	OUR RESPONSE
SA1 - Air Pollution		
1a		Support.
SA2 - Biodiversity		
2a		No comment.
2b		It is demonstrated that Ancient Woodland adjacent to the site can be retained and sensitively designed into the proposal in line with Natural England's Standing Advice. As such the development would not have a 'significant negative' effect. For the reasons above the methodology for this assessment criteria should be revised.
2c		No comment.
2d		Priority habitat adjacent to the site (namely the woodland to the south) will be retained. As such it cannot be concluded that the effect would be 'minor negative'.
SA3 - Climate Change		
3a		No comment.
3b		No comment.
SA5 - Flood Risk		
5a		No comment.
5b		The areas of surface water flood risk within the site are limited. The future development of the site can avoid these areas and improve the drainage capabilities of the site as part of the drainage design.
5c		No comment
SA6 - Coastal Erosion		
6a		No comment.

INDICATORS	SI RESPONSE	OUR RESPONSE
SA7 - Health and Wellbeing		
7a		Support. The site is in a location with good access to essential services. This is demonstrated with the enclosed Transport Technical Note.
7b		Future development of the site could accommodate public open space within the scheme, which will be an overall benefit for the local area.
7c		No comment.
SA9 - Access to Services		
9a		Support. As noted, the site is in a sustainable, or at least 'moderately sustainable' location, given its proximity to the settlement and existing services and non-car travel links. This is demonstrated with the enclosed Transport Technical Note.
SA11 - Heritage		
11a		No comment.
11b		No comment.
SA12 - Land and Soil		
12a		No comment, the site is Grade 3 agricultural land. Note that much of the land around southern Battle is Grade 3.
SA14 - Water Quality		
14a		No comment.
SA15 - Parks and Countryside		
15a		In reflection of our comments on the assessment methodology. The development would result in impacts to land within the National Landscape, but this impact would be contained to the site and for the reasons outlined previously this impact is acceptable on balance with the need to consider sites in protected landscapes. This site cannot be compared to more exposed sites in the National Landscape.
15b		No comment as above.
15c	N/A	No comment.
15d		Greenfield land, or partially greenfield land, will need to be used to meet local housing needs.
SA17 - Employment		
17a		No comment.
17b	N/A	No comment.
SA20 - Roads and Travel Choice		
20a		No comment.
20b	N/A	No comment.

3.2.44 Please also refer to Question 8 for our comments on the scoring for the proposed development strategy.

4 CONCLUSION

- 4.1.1 This representation has been prepared on behalf of Rurban Estates Limited in response to Rother District Council's Regulation 18 consultation on the Draft Local Plan 2025-2042.
- 4.1.2 The purpose of this representation is to support the strategic growth identified for Battle and the inclusion of 'Land adjoining Little Brans' under draft Policy BT10. This representation affirms our client's commitment to developing the site and provides evidence to demonstrate that the site is suitable for allocation and that all identified constraints can be overcome through sensitive design. It also supports the expected promotion of the adjoining land parcel by a third-party landowner and confirms that this land can be accommodated into the wider masterplan for BT10.
- 4.1.3 Our client is supportive in principle of the overall development strategy, which recognises the unavoidable need to utilise land within the High Weald National Landscape to deliver the quantum of homes required across the Plan period. This is further demonstrated by the recognised shortfall of housing land in consultation document, even with the identified site allocations and the potential need to accommodate some of the unmet needs of neighbouring districts.
- 4.1.4 We welcome the inclusion of Battle in the settlement hierarchy, which acknowledges the role of the settlement as a key transport and community hub in this part of the district. The settlement also lies in proximity to the Borough of Hastings. The development of land here will contribute to the district's own housing need but aligns with the recognition that there are inherent linkages in the housing market in this area, as set out in the joint HEDNA prepared by the Council and Hastings Borough Council.
- 4.1.5 In light of RDC's significant housing need, and in recognition of the proposed further expansion of Battle, land adjoining Little Brans is well placed to deliver a cohesive and landscape-led residential development opportunity which integrates open space and biodiversity enhancements whilst making a valuable contribution to the delivery of at least 65 high-quality new homes. However using the indicated development density of 30dph, the site has the potential to accommodate at least 70 units using the net developable area shown on the Constraints and Opportunities plan. There is also potential to achieve at least 75 dwellings, at the indicated 30dph, by refining the net developable area without development parcels encroaching further away from the settlement edge and impacting the conclusions made on the National Landscape.
- 4.1.6 With the inclusion of the field being promoted to the south-west, and based on a net developable area of 0.3ha, there is potential for the capacity of BT10 to be further increased by some 10 homes.
- 4.1.7 We are supportive of the inclusion of draft Policy BT10 and comment on how the emerging development on the site will align with the policy objectives.

APPENDIX

1





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DISCUSSION

- Site boundary (5.75ha)
- - - Public Right of Way (PRoW)
- Existing bus stop
- Proposed recreational routes
- ⚙️ Proposed cycle hire hub
- ① Proposed vehicular access
- ② Proposed cycle and pedestrian access
- ③ Proposed primary street
- ④ Proposed secondary street
- ⑤ Proposed private drive
- ⑥ Proposed Local Equipped Area of Play (LEAP)
- ⑦ Indicative areas for attenuation
- ⑧ Existing vegetation retained
- ⑨ Proposed open space
- ⑩ Proposed wildflower meadow
- ⑪ Proposed woodland planting
- ⑫ Proposed vegetation
- ⑬ Proposed pedestrian crossing area

Rev.	Date	Description
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Land west of Hastings Road
BATTLE

Illustrative Masterplan

Job ref: 632	Drawing number: SK03	Revision:
Scale: 1:2000 @ A3	Date: May 2025	



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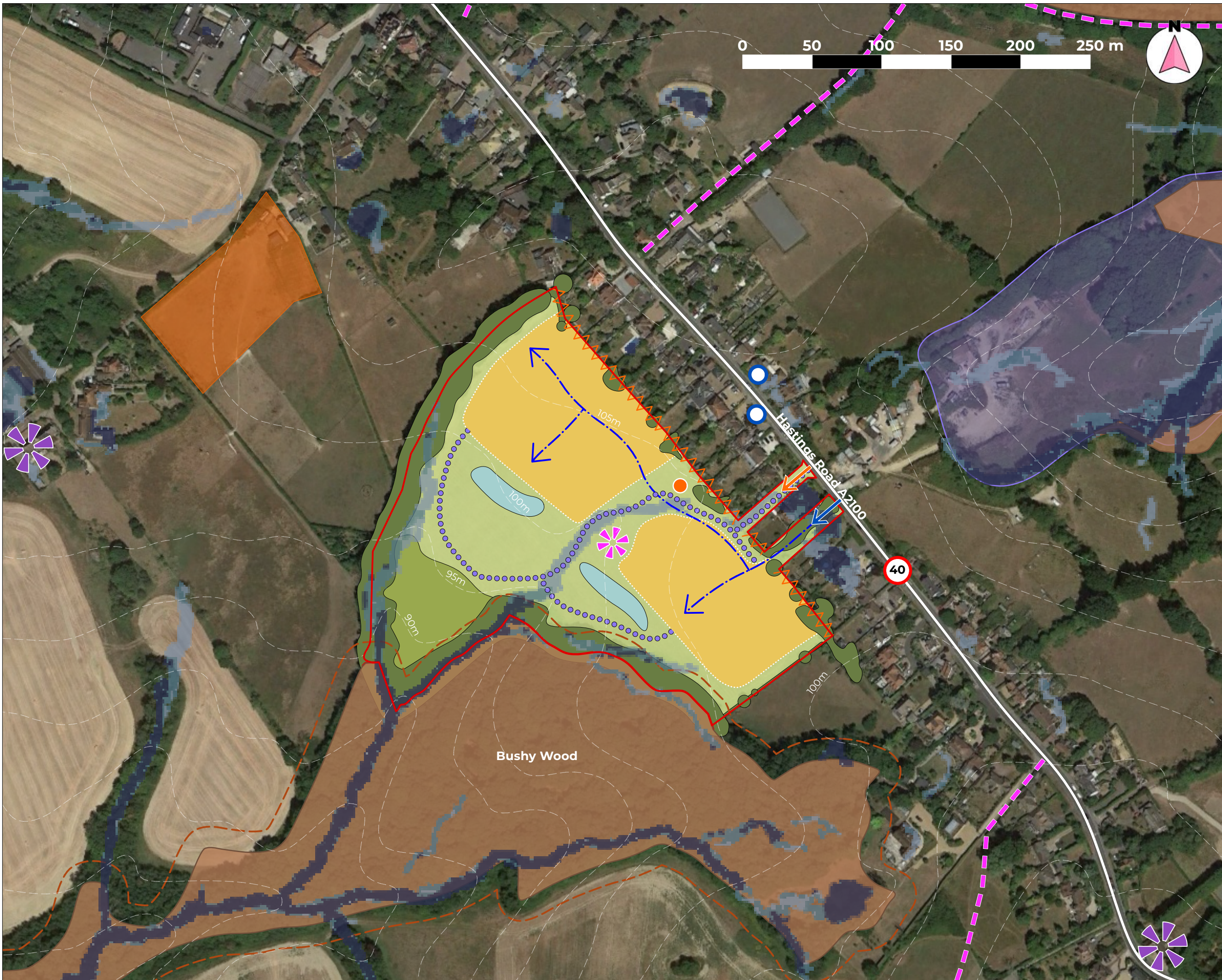
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APPENDIX

2





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DISCUSSION

- Site boundary (5.75ha)
- - - Public Right of Way (PRoW)
- Ancient woodland (15m easement)
- Existing vegetation (to be retained where possible)
- ✱ Listed building
- Landfill: Branshill Farm
- LAA positive site (RTHET1776)
- Surface water flooding (low-high)
- 40 Speed limit
- ~ Rear/side residential boundary
- Existing bus stop
- ← Existing access to be upgraded to pedestrian/cycle access
- ← Proposed vehicular access
- ← Proposed primary street
- Proposed recreational route
- Proposed cycle hire hub
- Indicative attenuation basin
- ✱ Proposed play area (LEAP)
- Proposed woodland
- Proposed open space
- Proposed residential development (2.30ha @ 35dph = 80 dwellings)

N.B. The whole Site and surrounding area shown on this plan are within the High Weald National Landscape

Rev.	Date	Description
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**Land west of Hastings Road
BATTLE**

Constraints and Opportunities Plan

Job ref: 632	Drawing number: SK02	Revision: 	Date: May 2025
Scale: 1:2500 @ A3			



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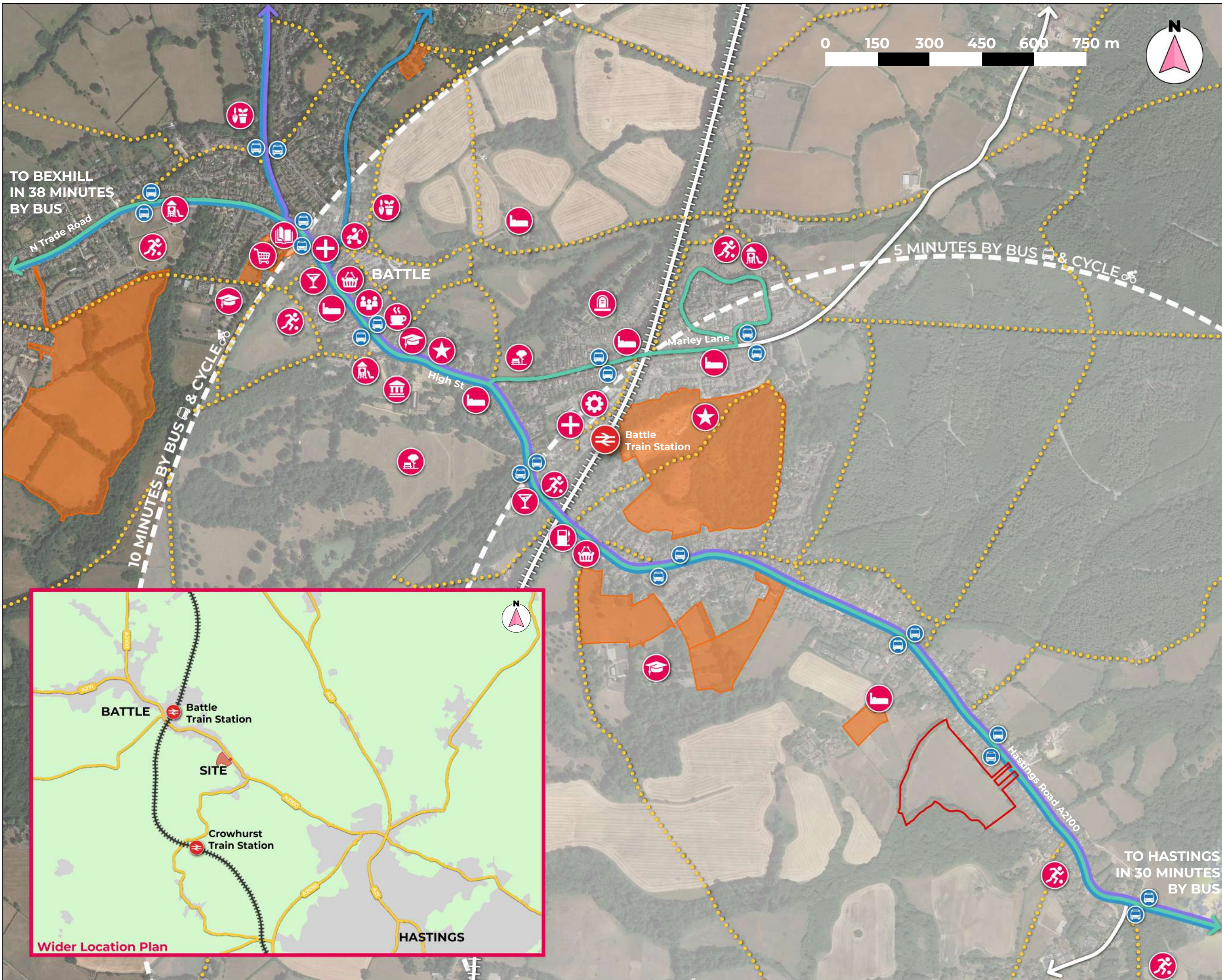
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APPENDIX

3





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DISCUSSION

- Site boundary (5.75ha)
- ⋯ Public Right of Way (PRoW)
- LAA positive sites
- Bus route 95
- Bus route 384
- Bus route 1066
- Bus stop
- School
- Nursery
- GP Surgery
- Community centre
- Convenience store
- Supermarket
- Recreation ground
- Play area
- Park or garden
- Historical landmark
- Cafe
- Library
- Cemetery
- Hotel
- Religious grounds
- Allotment
- Pub
- Petrol station
- Industry/business park

Rev.	Date	Description

Land west of Hastings Road
 BATTLE

Facilities Plan

Job ref: 632	Drawing number: SK01	Revision:
Scale: 1:10000 @ A3	Date: May 2025	



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Wider Location Plan

APPENDIX

4



TRANSPORT TECHNICAL NOTE

JOB REF. **LS/JM/LC/33738** CLIENT **Rurban Estates**

SITE **Land adjacent to Little Brans, 124 Hastings Road, Battle, East Sussex**

1.1 INTRODUCTION

- 1.1.1 This Transport Technical Note (TTN) has been prepared in support of a response to the open consultation on the emerging Rother Local Plan by Rurban Estates in relation to Land adjacent to Little Brans, 124 Hastings Road in Battle, East Sussex, which is being promoted for residential development.
- 1.1.2 The current proposals are for the development of in the region of 65 homes in reflection of draft Policy BT10. This TTN outlines the proposed multi-modal access strategy, considers the accessibility of the site, quantifies the likely vehicular trip generation of the potential development and identifies appropriate and proportionate mitigation measures.

1.2 PROPOSAL SITE

- 1.2.1 The site is located to the south-west of the A2100 Hastings Road, approximately 2.5km to the south-east of the centre of Battle 'as the crow flies'. The location of the site within a local context is shown in Figure 1 overleaf.



FIGURE 1: SITE LOCATION (COURTESY OF GOOGLE MAPS)

1.2.2 The site currently comprises an open field that is accessible from the A2100. It is bound to the north-west and south-west by woodland, to the north-east by residential dwellings and the A2100 Hastings Road, and to the south-east by a further open field.

1.3 DEVELOPMENT PROPOSALS

1.3.1 The proposals comprise the development of in the region of 65 homes with associated access, landscaping and open space. An indicative layout plan is included in **Appendix A**.

1.3.2 It is proposed that vehicular access to the development would be achieved by way of a new priority junction with the A2100 Hastings Road, approximately 220m to the south-east of the junction with the lane also known as Hastings Road and 290m to the north-west of the junction with Little Hemingfold. An indicative design is included at **Appendix B**. The access design would be subject to an independent Stage 1 Road Safety Audit as part of the preparation of any future planning application; however, no significant issues are foreseen. The access will have a carriageway width of 5.5m and will be provided with 8m kerb radii to aid the turning of larger vehicles.

- 1.3.3 In order to confirm the required visibility splays from the access, an Automatic Traffic Count (ATC) survey was completed by East Sussex County Council (ESCC) Highways for the seven-day period commencing Monday 17th March 2025. This survey recorded 85th percentile vehicle speeds of 38.31mph and 35.81mph for south-eastbound and north-westbound traffic, respectively. Using these speeds and the calculations set out in Manual for Streets 2, visibility splays of 2.4 x 70m to the south-east and 2.4 x 77m to the north-west have been demonstrated within land under control of the applicant and the Local Highway Authority.
- 1.3.4 Pedestrian access to the site would be achievable from two separate points. A 2m wide footway will be located on the northern side of the vehicular access, connecting to the existing pedestrian infrastructure on Hastings Road. An uncontrolled pedestrian crossing will be provided approximately 50m to the north of the vehicular access, connecting with the existing footway on the eastern side of Hastings Road, which continues into Battle. In addition, the existing agricultural access to the site to the north will be upgraded to a shared footway / cycleway.
- 1.3.5 The site access and internal layout will give consideration to Local Transport Note 1/20, Manual for Streets and the ESCC Local Design Guide for Residential Development with respect to pedestrian and cycle infrastructure.

1.4 PEDESTRIAN AND CYCLE ACCESSIBILITY

- 1.4.1 As has been noted, the A2100 Hastings Road is afforded a pedestrian footway on its southern side, measuring approximately 2m in width and terminating 70m to the north of the existing site access. A footway measuring approximately 1.4m in width is provided on the northern side of Hastings Road, which provides a continuous route between Battle and the village of Telham.
- 1.4.2 Figure 2, overleaf, displays the local Public Rights of Way (PRoW) network in the site vicinity, with purple lines indicating Public Footpaths, pink lines indicating Licensed Footpaths and yellow lines indicating Promoted Paths.

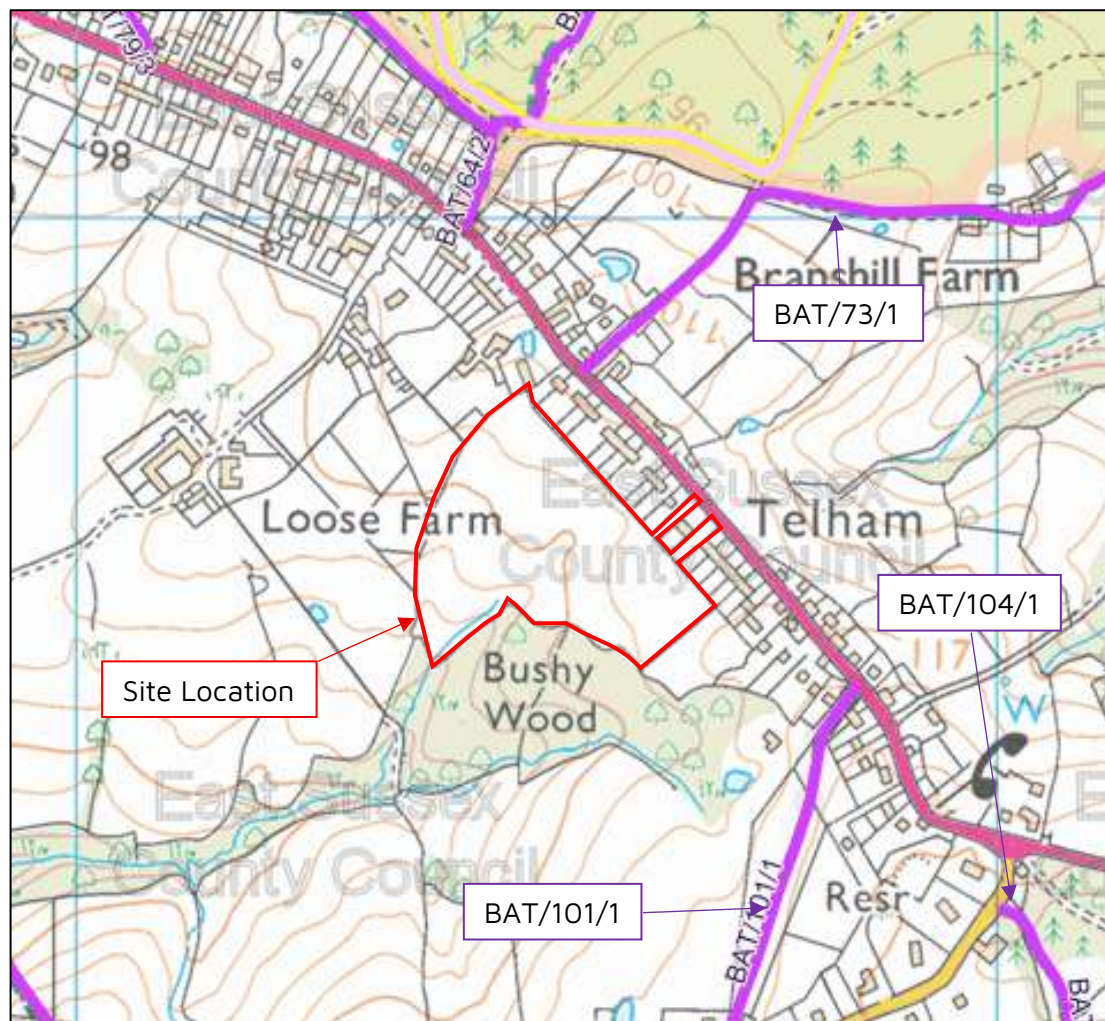


FIGURE 2: PROW NETWORK LOCAL TO SITE (COURTESY OF ESCC)

- 1.4.3 Footpath BAT/73/1 is accessible at the junction between the A2100 and the lane known as Hastings Road, approximately 180m (equating to a two-minute walk) to the north-west of the existing site access. It routes north-east towards Kent Street along the boundary of Great Wood.
- 1.4.4 Footpath BAT/101/1 is accessible from the A2100, approximately 270m (equating to a three-minute walk) to the south-east of the existing site access. It routes between the A2100 and Telham Lane, from where further PRoW towards Crowhurst can be accessed.
- 1.4.5 Footpath BAT/104/1 is accessible from Telham Lane, approximately 600m (equating to an eight-minute walk) to the south-east of the existing site access. It routes south-eastwards to the urban boundary of Hastings.

- 1.4.6 There is currently no formal cycling infrastructure local to the site; however, much of the local highway network within Battle and the surrounding area is considered suitable for on-carriageway cycling by competent individuals.

1.5 PUBLIC TRANSPORT ACCESSIBILITY

- 1.5.1 A pair of bus stops is located on Hastings Road, approximately 40m (equating to a walk time of less than one minute) to the north-west of the existing site access. These bus stops are provided with flag and post arrangements and timetable information. Table 1 below lists the services that are accessible from these stops.

SERVICE NO.	ROUTE	SERVICE FREQUENCY			
		WEEKDAY PEAK	WEEKDAY OFF-PEAK	SATURDAY	SUNDAY
95	Conquest Hospital – Little Common	One per peak	One every two hours	One every two hours	No services
384	Ashdown House – Robertsbridge College	School service	No services	No services	No services
1066	Hastings – Hawkhurst – Tunbridge Wells	Two per hour	One per hour	One per hour	One every two hours
B72	Mountfield – Broad Oak – Battle	No services	One per day (Mondays only)	No services	No services
B75	Mountfield – Battle – Baldslow	No services	One per day (Wednesdays only)	No services	No services

TABLE 1: BUS SERVICES ACCESSIBLE FROM THE A2100 HASTINGS ROAD

- 1.5.2 Battle Railway Station is located approximately 2km (equating to a 25-minute walk, five-minute cycle, or six-minute bus journey on either the 95 or 1066 services) to the north-west of the existing site access. This station is afforded 255 vehicle parking spaces, including eight disabled spaces, plus 30 cycle parking spaces in the form of Sheffield stands which are sheltered and subject to CCTV coverage. There is step-free access to Platform 1 for services towards London. Battle Railway Station provides access to direct services to London Charing Cross and Hastings twice per hour during weekdays and weekends.

- 1.5.3 It is evident that the site benefits from ready access to frequent public transport services that would enable residents to access an extensive range of services and facilities both in local towns (Battle and Hastings) and further afield (e.g. in Tunbridge Wells and London) throughout the week. Indeed, the bus services available on Hastings Road surpass many of those available in suburban areas of Rother District in terms of their availability during the evening and at weekends.

1.6 SITE ACCESSIBILITY

- 1.6.1 A wide range of everyday services and facilities is available within Battle, which can be accessed via the aforementioned pedestrian and public transport routes. Table 2 overleaf lists a selection of these, along with their approximate distances, walking¹ and cycle times, and bus routes from the existing site access.

¹ based on a walk speed of 80m per minute; a figure which is widely used to estimate walk times and used within the London-based Public Transport Accessibility Level (PTAL) analysis

SERVICE / FACILITY	DISTANCE	WALK TIME	CYCLE TIME	BUS TIME (ROUTE)
Supermarket – Tesco Express	1.6km	20 minutes	4 minutes	8 minutes (Routes 95, 1066)
Public House – The Railway Country Pub	1.6km	20 minutes	4 minutes	5 minutes (Routes 95, 1066)
Convenience Store – Co-Op Food	2.4km	30 minutes	7 minutes	8 minutes (Routes 95, 1066)
Restaurant – La Bella Napoli	2.5km	31 minutes	8 minutes	10 minutes (Routes 95, 1066)
GP Surgery – Martins Oak Surgery	2.6km	33 minutes	8 minutes	9 minutes (Routes 95, 1066)
Dentist – The Mount Street Dental Practice	2.7km	34 minutes	9 minutes	9 minutes (Routes 95, 1066)
Post Office	2.8km	35 minutes	10 minutes	12 minutes (Routes 95, 1066)
Primary School – Battle & Langton Church of England Primary School	3.0km	38 minutes	10 minutes	13 minutes (Routes 95, 1066)
Nursery – Claverham Day Nursery	3.9km	49 minutes	12 minutes	12 minutes (Routes 95, 1066)

TABLE 2: SERVICES AND FACILITIES LOCAL TO PROPOSAL SITE

- 1.6.2 The cycle times are based on the Google Maps journey planner tool, which assumes a standard moving speed of 16km per hour for cyclists and takes into account such elements as elevation change and number of junctions crossed on a given route.
- 1.6.3 The bus times include both the walk time from the site to the bus stop and the bus journey time from the bus stop to the service / facility.
- 1.6.4 Isochrones demonstrating accessibility to local services and facilities via bus and cycle are included at **Appendix C**.

1.7 TRIP GENERATION ASSESSMENT

- 1.7.1 The potential vehicular trip generation of the proposed development has been forecast with reference to the national TRICS 8 trip rate database. To ensure a robust initial assessment of the site, surveys in the categories '03 - RESIDENTIAL, A - HOUSES PRIVATELY OWNED' and '03 - RESIDENTIAL, B - AFFORDABLE / LOCAL AUTHORITY HOUSING' have been selected. Survey sites outside of Greater London within England, Scotland and Wales have been considered in 'Edge of Town' locations. Surveys undertaken during the period of Covid-19 travel restrictions have been excluded. The resulting average TRICS trip rates are shown in Table 3 below, with the full TRICS reports included at **Appendix D**.

PERIOD	ARRIVALS	DEPARTURES	TOTAL
HOUSES PRIVATELY OWNED			
AM Peak (08:00-09:00)	0.164	0.396	0.560
PM Peak (17:00-18:00)	0.369	0.183	0.552
Daily (07:00-19:00)	2.596	2.624	5.220
AFFORDABLE / LOCAL AUTHORITY HOUSES			
AM Peak (08:00-09:00)	0.215	0.383	0.598
PM Peak (17:00-18:00)	0.287	0.221	0.508
Daily (07:00-19:00)	2.324	2.312	4.636

TABLE 3: TRICS TRIP RATES (TRIPS / DWELLING)

- 1.7.2 These trip rates have subsequently been multiplied by 65 homes – with a policy-compliant 30% affordable housing applied to provide 19 units of affordable housing and 46 units of privately-owned housing – to provide the forecast vehicle trip generation in Table 4 overleaf. Please note that any inaccuracies are the result of rounding in MS Excel.

PERIOD	ARRIVALS	DEPARTURES	TOTAL
HOUSES PRIVATELY OWNED (46 UNITS)			
AM Peak (08:00-09:00)	7	18	25
PM Peak (17:00-18:00)	17	8	25
Daily (07:00-19:00)	118	119	238
AFFORDABLE / LOCAL AUTHORITY HOUSING (19 UNITS)			
AM Peak (08:00-09:00)	4	7	11
PM Peak (17:00-18:00)	5	4	10
Daily (07:00-19:00)	44	44	88
TOTAL (65 UNITS)			
AM Peak (08:00-09:00)	12	25	37
PM Peak (17:00-18:00)	22	13	35
Daily (07:00-19:00)	162	163	326

TABLE 4: TOTAL DEVELOPMENT TRIP GENERATION (65 UNITS)

- 1.7.3 It is noted that the proposed development could generate approximately 37 vehicle movements during the weekday AM peak hour and 35 movements during the PM peak hour, with 326 movements forecast across the 12-hour daytime period (07:00-19:00). This equates to approximately 27 movements per hour – or one movement every two minutes – on average.

1.8 TRIP DISTRIBUTION AND ASSIGNMENT

- 1.8.1 A vehicular trip distribution and assignment exercise has been completed using 'Location of usual residence and place of work by method of travel to work' data from the 2011 Census for Middle-Layer Super Output Area (MSOA) 'Rother 006', in which the site is located.
- 1.8.2 It is noted that whilst equivalent data from the 2021 Census has subsequently been released, this was obtained during the Covid-19 pandemic when travel demand was suppressed. The 2011 data has therefore been used in the interest of robustness.
- 1.8.3 The total vehicular trip generation set out in Table 4 has been distributed and assigned to the local highway network as summarised in Table 5 overleaf.

JUNCTION	PERCENTAGE DISTRIBUTION	AM PEAK TRIPS	PM PEAK TRIPS
A2100 Lower Lake / B2095 Powdermill Lane	54%	20	19
A2100 Hastings Road / Telham Road	46%	17	16
A2100 Hastings Road / A2100 The Ridge West / B2159 Battle Road	44%	16	15
A2100 Lower Lake / A2100 Upper Lake / Marley Lane	42%	16	15
A2100 High Street / Mount Street	33%	12	12
A2100 The Ridge West / A2690 Queensway	26%	10	9
A2100 High Street / A2100 London Road / A271 North Trade Road	18%	7	6
The Ridge / Maplehurst Road	12%	4	4
A271 North Trade Road / A271 / B2096 Battle Road	5%	2	2

TABLE 5: FORECAST VEHICLE TRIP DISTRIBUTION

1.8.4 This demonstrates that the proposed development will not have a material adverse impact on the operation of off-site junctions; all of which would experience fewer than 25 additional vehicle movements in each peak hour.

1.9 TRANSPORT STRATEGY

1.9.1 Internal site layout design is critical to the uptake of active and sustainable travel modes. The street network will prioritise walking and cycling at every opportunity, with wide, direct, landscaped and well-surveilled routes on principal corridors, shared surfaces and 'home zones' within lightly trafficked areas.

1.9.2 The implementation of cycle-to-work schemes by both employers and local authorities has achieved an increase in the number of people who are opting to cycle either their full commute or part of it. This will be facilitated by the provision of secure cycle storage facilities for every dwelling.

1.9.3 Where car-use remains necessary, the increased uptake of electric and low-emission vehicles will progressively reduce their environmental impact, and these will be promoted through the installation of 'active' charging infrastructure for every dwelling.

1.9.4 The site is close to frequently-served bus stops. Measures to promote the use of local bus services will be explored, including timetable information being provided

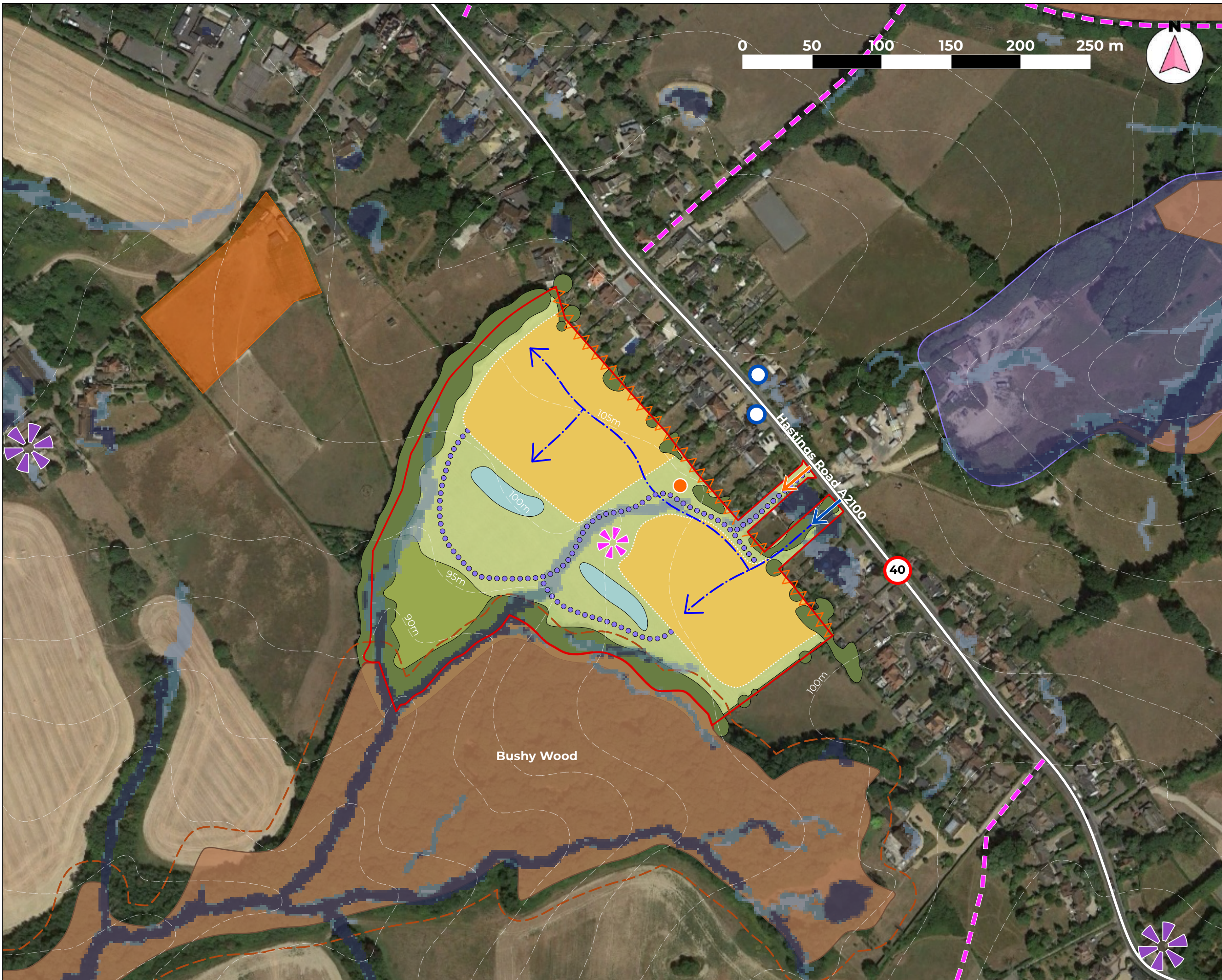
to new residents through the distribution of Travel Information Packs and the provision of discounted bus tickets and passes.

1.10 SUMMARY AND CONCLUSION

- 1.10.1 This Transport Technical Note (TTN) has been prepared in support of a response to the open consultation on the emerging Rother Local Plan by Rurban Estates in relation to Land adjacent to Little Brans, 124 Hastings Road in Battle, East Sussex, which is being promoted for residential development.
- 1.10.2 The proposals comprise the development of in the region of 65 homes and associated access, landscaping and open space.
- 1.10.3 Vehicular access to the site will be achieved by way of a new priority junction with the A2100 Hastings Road, which can demonstrate adequate visibility splays, as informed by an Automatic Traffic Count survey. The access will incorporate a 2m wide pedestrian footway on its northern side, which will link to the existing pedestrian and cycle infrastructure on the A2100 Hastings Road. In addition, the existing agricultural access to the site will be upgraded to a shared footway / cycleway, which will tie in with the proposed footway as well as the existing infrastructure on the A2100.
- 1.10.4 A review of the existing local pedestrian, cycle and public transport infrastructure has demonstrated that the site is afforded the opportunity for many everyday journeys to take place by active and sustainable travel modes, with a range of local services and facilities located within a reasonable distance and accessible via short journeys on public transport.
- 1.10.5 An initial trip generation assessment has been completed for the proposals, which indicates that the development has the potential to generate approximately 37 vehicle movements during the weekday AM peak hour and 35 movements during the PM peak hour, with 326 movements generated across the twelve-hour daytime period (07:00-19:00). This equates to approximately 27 movements per hour – or one movement every two minutes – on average.
- 1.10.6 These vehicle trips have been distributed and assigned to the local highway network using the 2011 Census data. This has demonstrated that the impact that the proposed development would have on local junctions and links is not considered to be 'severe'. Nevertheless, measures will be put in place to promote the use of sustainable modes of transport, such as the distribution of Travel Information Packs to new residents that will highlight the availability of local public transport services.
- 1.10.7 In summary, it has been demonstrated that the site represents a viable and sustainable location for development in transport planning terms.

APPENDIX
A





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DISCUSSION

- Site boundary (5.75ha)
- - - Public Right of Way (PRoW)
- Ancient woodland (15m easement)
- Existing vegetation (to be retained where possible)
- ✱ Listed building
- Landfill: Branshill Farm
- LAA positive site (RTHET1776)
- Surface water flooding (low-high)
- 40 Speed limit
- ~ Rear/side residential boundary
- Existing bus stop
- ← Existing access to be upgraded to pedestrian/cycle access
- ← Proposed vehicular access
- ← Proposed primary street
- Proposed recreational route
- Proposed cycle hire hub
- Indicative attenuation basin
- ✱ Proposed play area (LEAP)
- Proposed woodland
- Proposed open space
- Proposed residential development (2.30ha @ 35dph = 80 dwellings)

N.B. The whole Site and surrounding area shown on this plan are within the High Weald National Landscape

Rev.	Date	Description
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**Land west of Hastings Road
BATTLE**

Constraints and Opportunities Plan

Job ref: 632	Drawing number: SK02	Revision:	
Scale: 1:2500 @ A3	Date: May 2025		

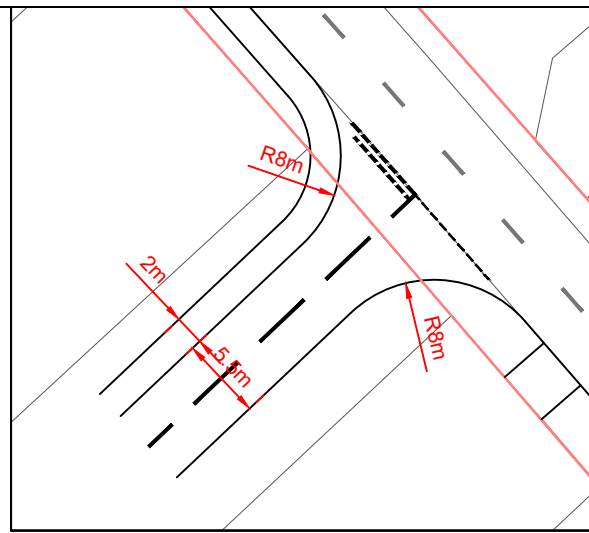
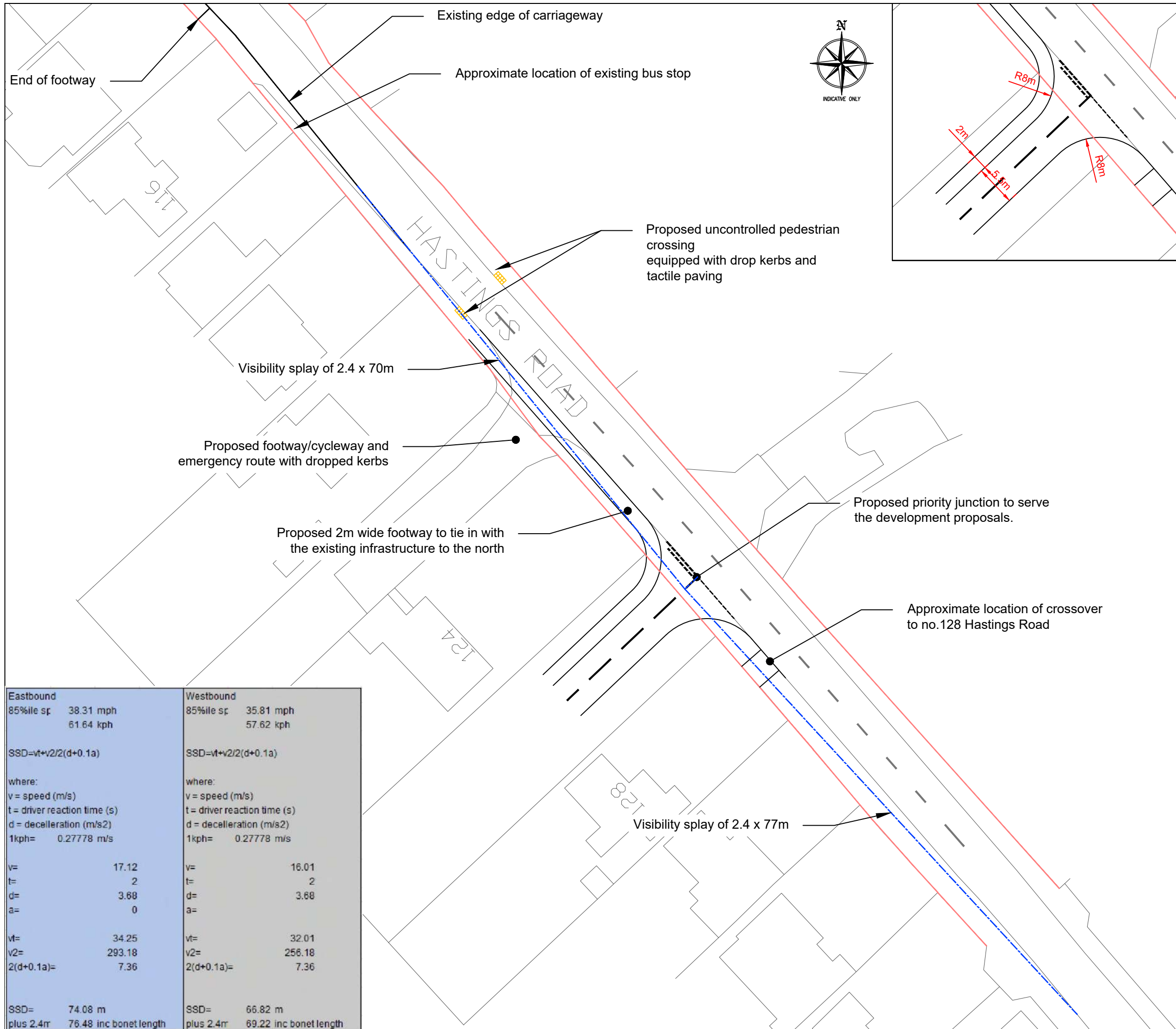


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APPENDIX
B





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- A week-long ATC traffic survey was completed at Hastings Road by ESCC on March 24th 2025, monitoring and recording 85th percentile speeds in both directions. The recorded average speed data of 39mph northbound and 36mph southbound will be used to inform the required visibility splays for the proposed access using standardised calculations from Manual for Streets 2.

● Highway boundary based on data provided by ESCC

5 0 5 10 15 20 25
Metres (1:500)

REV	DATE	BY	DESCRIPTION	CHK	APD
	P1 01.04.25	HL	First Issue	JM	JM

client
RURBAN ESTATES LIMITED

project
LAND TO THE REAR OF LITTLE BRANS, BATTLE, EAST SUSSEX

title
PROPOSED ACCESS ARRANGEMENT

project 33738	drwg H-01	rev P1
Drawn HL	Checked JM	Approved JM
scale @ A3 1:500		date 01.04.2025

status
FOR INFORMATION P

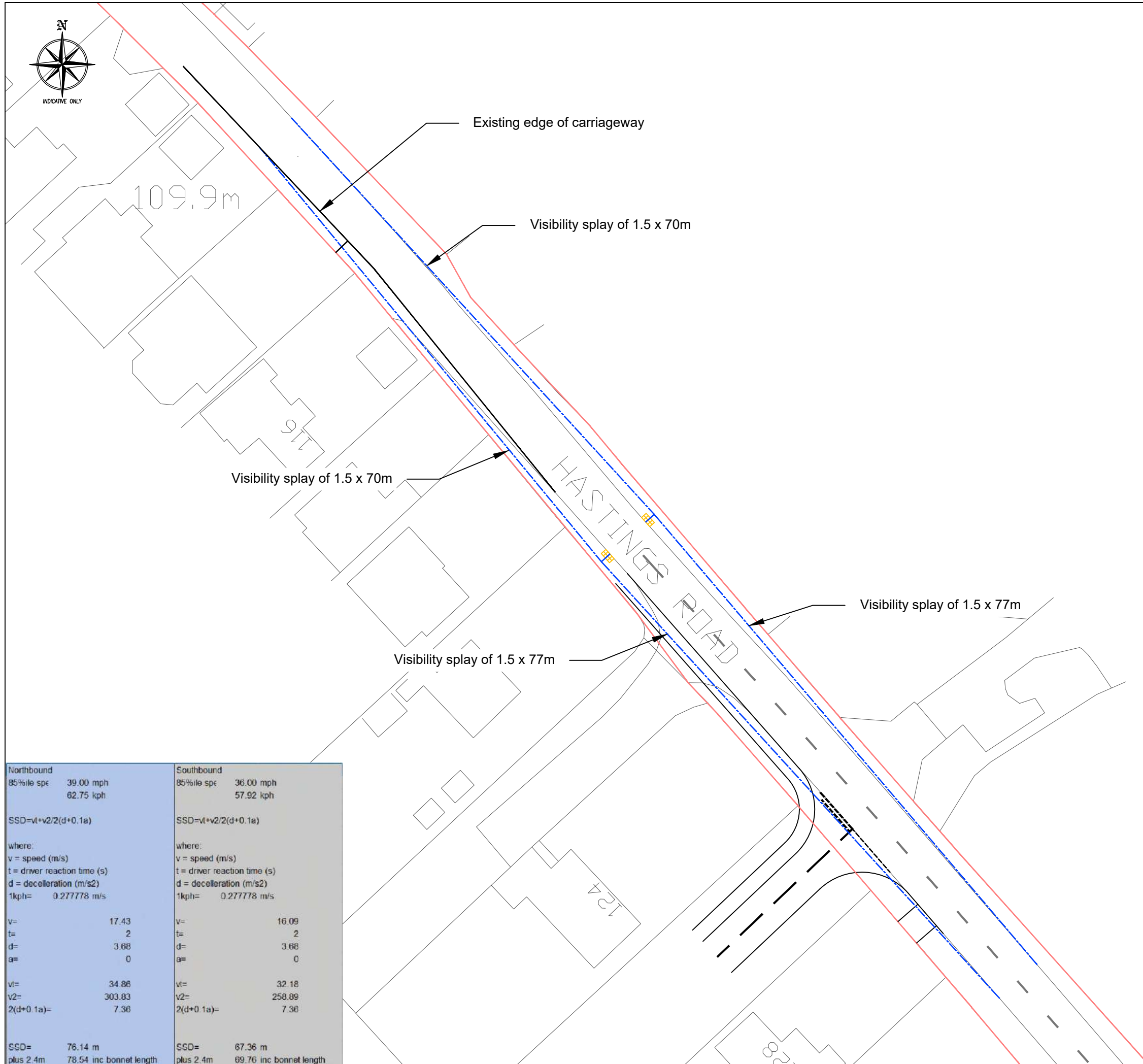
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CAD Reference: **A3**

Eastbound	Westbound
85%ile sp 38.31 mph 61.64 kph	85%ile sp 35.81 mph 57.62 kph
$SSD=vt+v^2/2(d+0.1a)$	$SSD=vt+v^2/2(d+0.1a)$
where: v = speed (m/s) t = driver reaction time (s) d = deceleration (m/s ²) 1kph= 0.27778 m/s	where: v = speed (m/s) t = driver reaction time (s) d = deceleration (m/s ²) 1kph= 0.27778 m/s
v= 17.12	v= 16.01
t= 2	t= 2
d= 3.68	d= 3.68
a= 0	a= 0
vt= 34.25	vt= 32.01
v ² = 293.18	v ² = 256.18
2(d+0.1a)= 7.36	2(d+0.1a)= 7.36
SSD= 74.08 m	SSD= 66.82 m
plus 2.4r 76.48 inc bonet length	plus 2.4r 69.22 inc bonet length



INDICATIVE ONLY



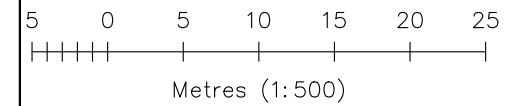
Northbound		Southbound	
85%ile spe	39.00 mph 62.75 kph	85%ile spe	36.00 mph 57.92 kph
SSD= $v^2+v^2/2(d+0.1a)$		SSD= $v^2+v^2/2(d+0.1a)$	
where: v = speed (m/s) t = driver reaction time (s) d = deceleration (m/s ²) 1kph= 0.277778 m/s		where: v = speed (m/s) t = driver reaction time (s) d = deceleration (m/s ²) 1kph= 0.277778 m/s	
v=	17.43	v=	16.09
t=	2	t=	2
d=	3.68	d=	3.68
a=	0	a=	0
v1=	34.86	v1=	32.18
v2=	303.83	v2=	258.89
2(d+0.1a)=	7.36	2(d+0.1a)=	7.36
SSD=	76.14 m	SSD=	67.36 m
plus 2.4m	78.54 inc bonnet length	plus 2.4m	69.76 inc bonnet length

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Highway boundary based on data provided by ESCC



REV	DATE	BY	DESCRIPTION	CHK	APD
P1	01.04.25	HL	First Issue	JM	JM

client	RURBAN ESTATES LIMITED
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project	LAND TO THE REAR OF LITTLE BRANS, BATTLE, EAST SUSSEX
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title	PEDESTRIAN VISIBILITY
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project	33738	drwg	H-02	rev	P1
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Drawn	Checked	Approved	scale @ A3	date
HL	JM	JM	1:500	01.04.2025

status	FOR INFORMATION	P
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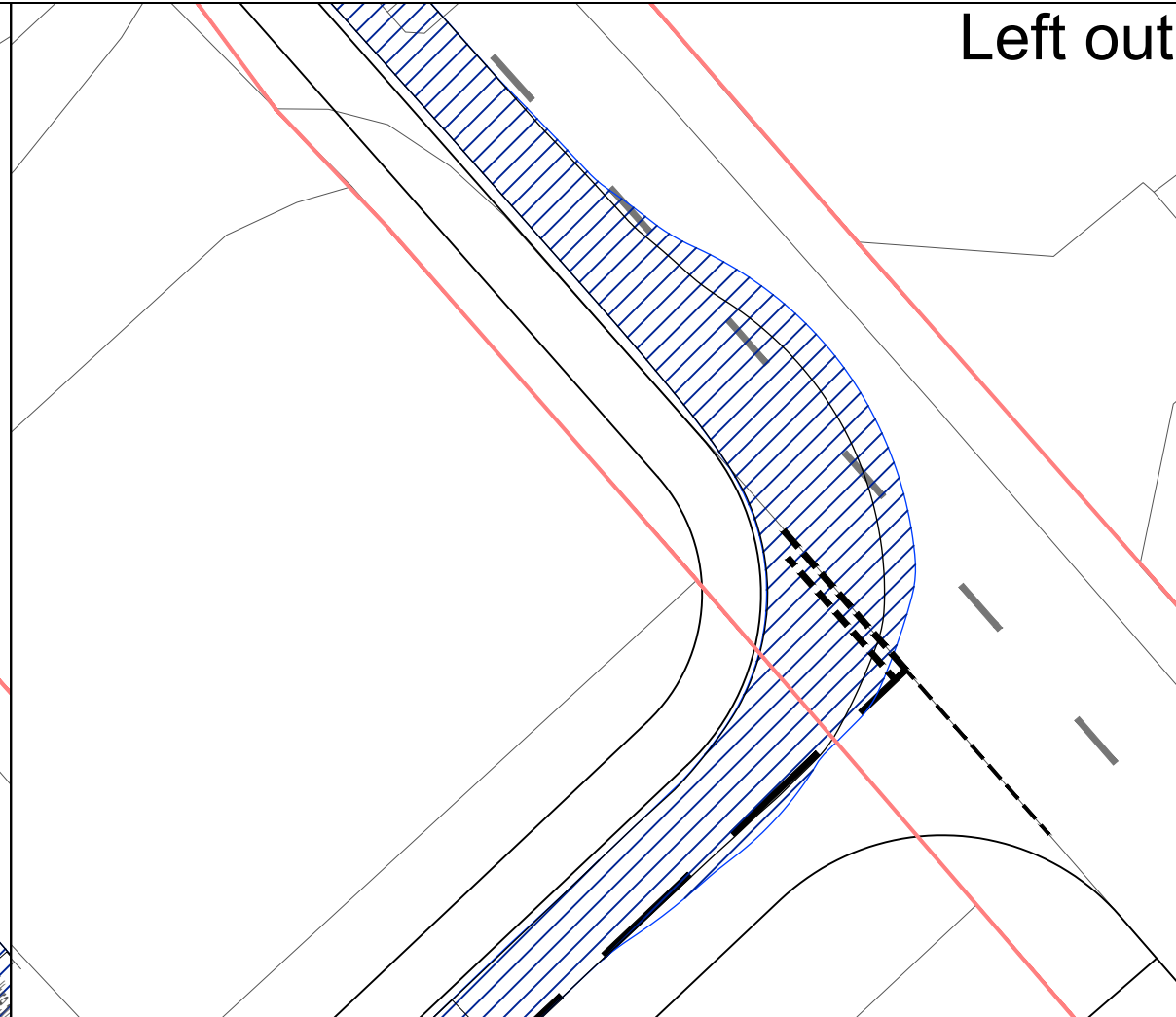
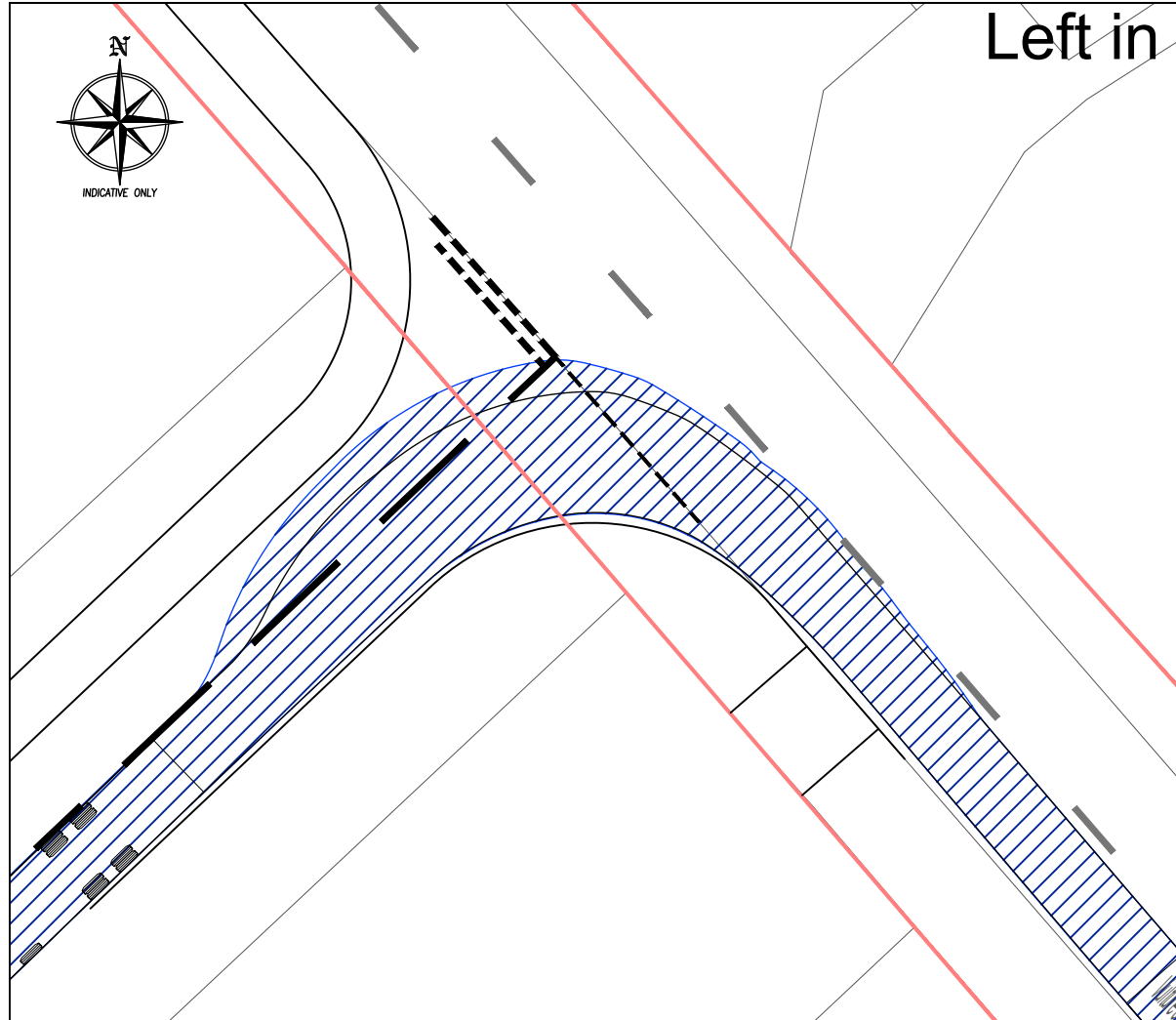
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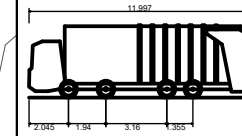
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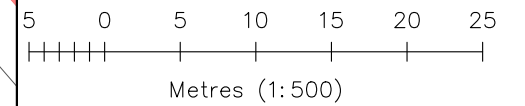


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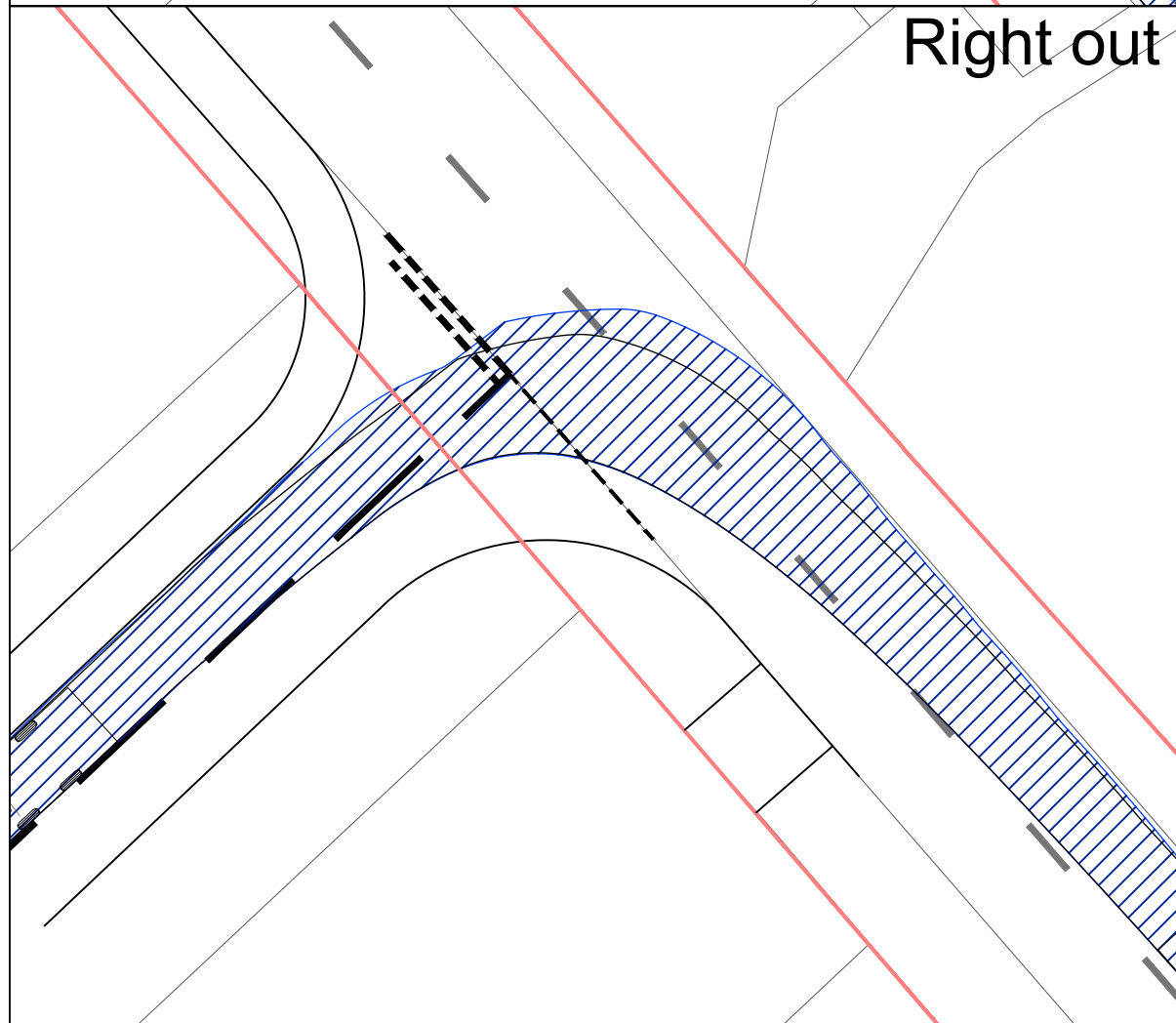
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Vulture 3025(N) (with Scania P94GB 8x4 NB300 chassis)
 Overall Length 11.997m
 Overall Width 2.500m
 Overall Body Height 3.751m
 Min Body Ground Clearance 0.304m
 Track Width 2.500m
 Lock to lock time 4.00s
 Kerb to Kerb Turning Radius 10.800m

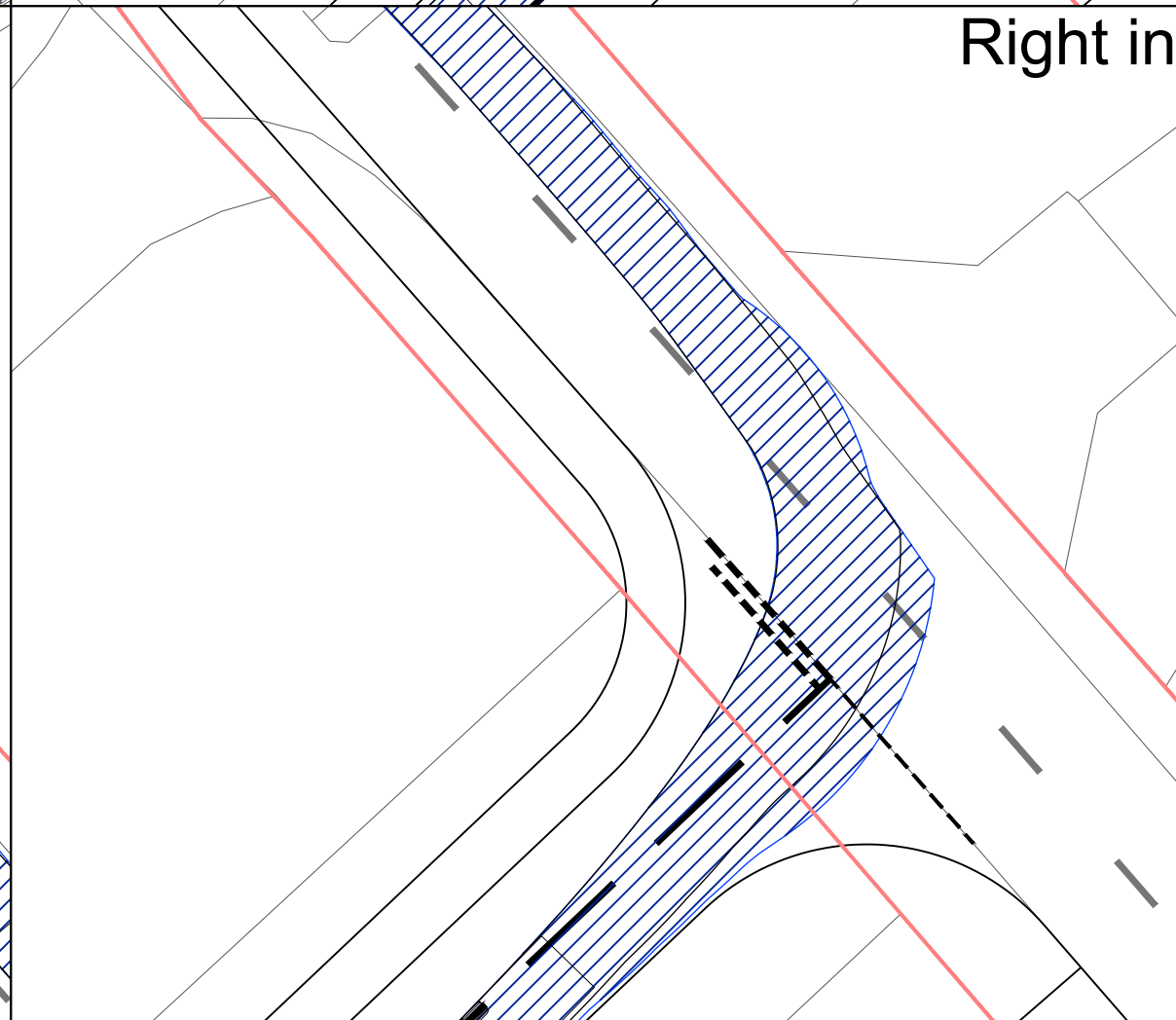


REV	DATE	BY	DESCRIPTION	CHK	APD
P1	01.04.25	HL	First Issue	JM	JM



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client
RURBAN ESTATES LIMITED

project
LAND ADJ LITTLE BRANS, BATTLE EAST SUSSEX

title
VEHICLE SWEEP-PATH ANALYSIS REFUSE VEHICLE

project	drwg	rev
33738	T-01	P1

Drawn	Checked	Approved	scale @ A3	date
HL	JM	JM	1:500	01.04.2025

status	
FOR INFORMATION	P



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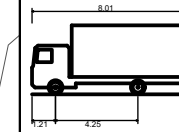
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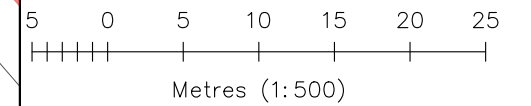
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7.5t Box Van
 Overall Length 8.010m
 Overall Width 2.100m
 Overall Body Height 3.556m
 Min Body Ground Clearance 0.351m
 Track Width 2.064m
 Lock to lock time 4.00s
 Kerb to Kerb Turning Radius 7.400m



REV	DATE	BY	DESCRIPTION	CHK	APD
P1	01.04.25	HL	First Issue	JM	JM

client	RURBAN ESTATES LIMITED
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project	LAND ADJ LITTLE BRANS, BATTLE EAST SUSSEX
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title	VEHICLE SWEEP-PATH ANALYSIS 7.5T BOX VAN
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project	33738	drwg	T-02	rev	P1
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Drawn	Checked	Approved	scale @ A3	date
HL	JM	JM	1:500	01.04.2025

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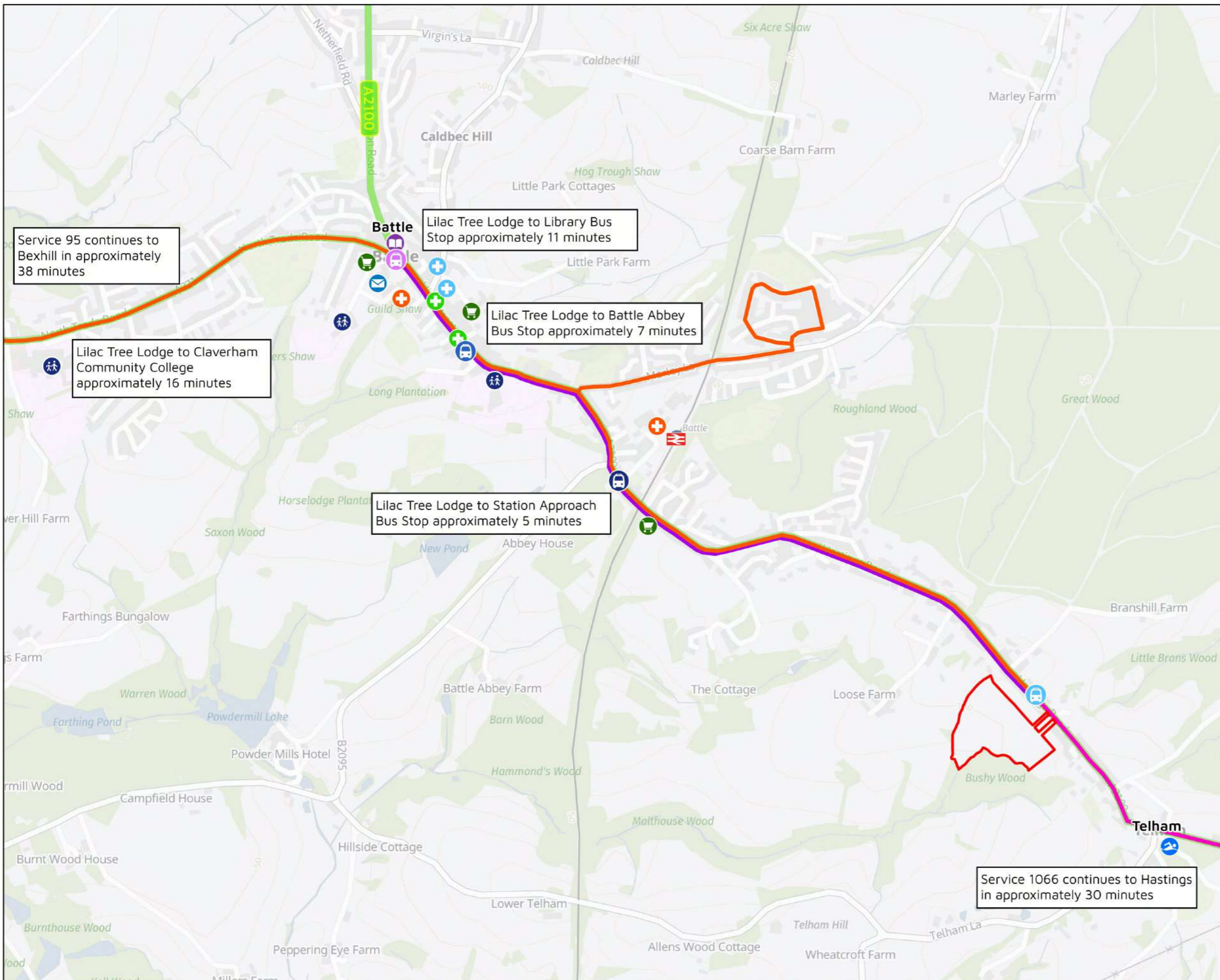


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APPENDIX
C





Service 95 continues to Bexhill in approximately 38 minutes

Lilac Tree Lodge to Claverham Community College approximately 16 minutes

Lilac Tree Lodge to Library Bus Stop approximately 11 minutes

Lilac Tree Lodge to Battle Abbey Bus Stop approximately 7 minutes

Lilac Tree Lodge to Station Approach Bus Stop approximately 5 minutes

Service 1066 continues to Hastings in approximately 30 minutes

Key

- Site Location
- Bus Route (Services 95, 384, 1066, B72 and B75)
- Bus Route 95 (Lilac Tree Lodge to Buxton Drive)
- Bus Route 1066 (Lilac Tree Lodge to Priors Meadow)
- A Roads
- + Dentist
- 📖 Library
- + Pharmacy
- + GP Surgery
- ✉ Post Office
- 🎒 School
- ⛪ Places Of Worship
- 🛒 Groceries
- 🏊 Access to Crowhurst Park gym/leisure
- 🚉 Battle Station

TITLE
Bus Journey From Lilac Tree Lodge To Battle Abbey Bus Stop

CLIENT
Rurban Estates Limited

PROJECT
Land adjacent to Little Brans, 124 Hastings Road, Battle, East Sussex

SCALE AT A3	DATE	JOB NO.	DRWG NO.
1:12,000	May 2025	33738	G-03



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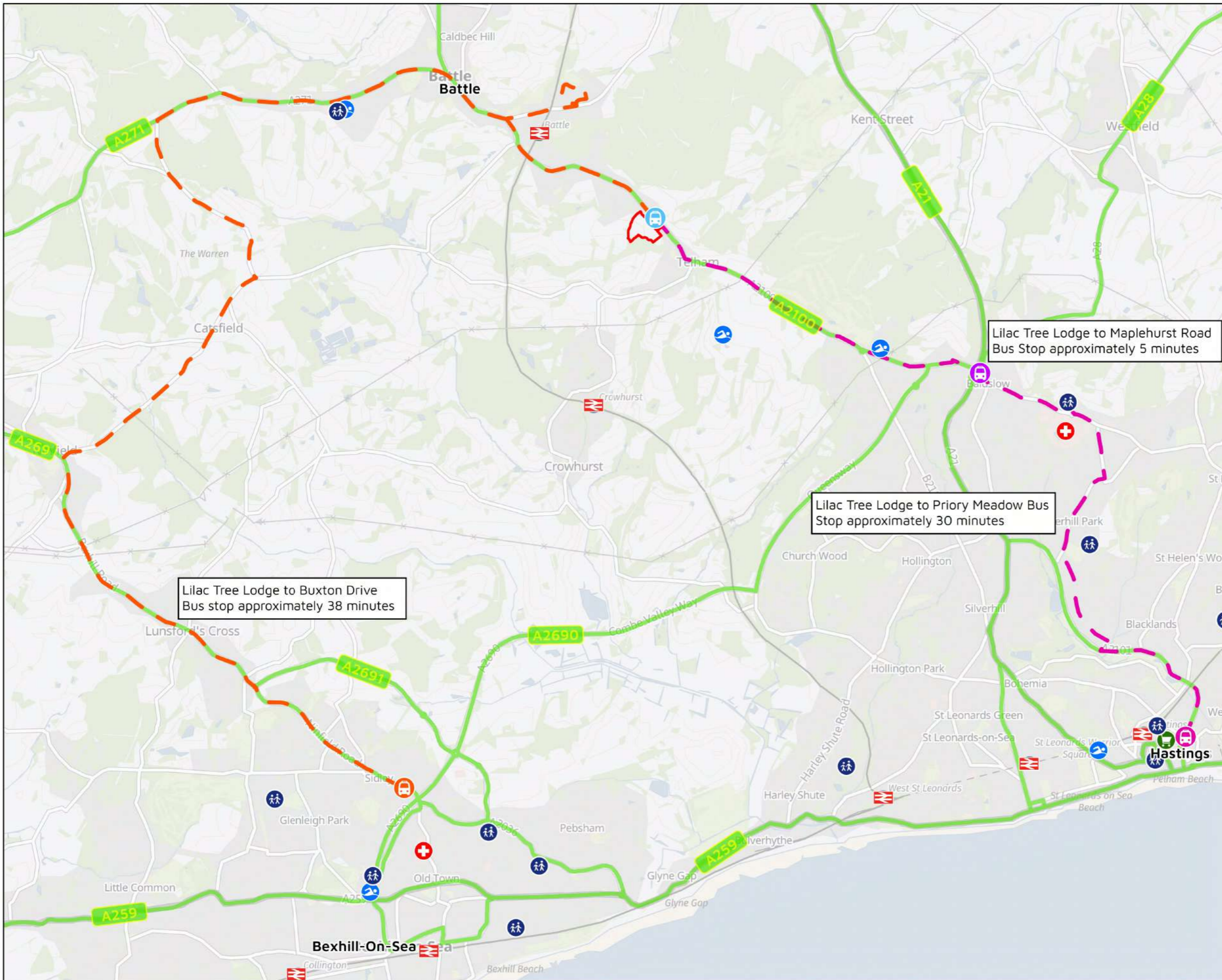
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Key

- Site Location
- Bus Route 1066 (Lilac Tree Lodge to Priory Meadow)
- Bus Route 95 (Lilac Tree Lodge to Buxton Drive)
- Lilac Tree Lodge Bus Stop
- Priory Meadow Bus Stop
- Buxton Drive Bus Stop
- Maplehurst Road Bus Stop
- Priory Meadow Shopping Centre
- Bexhill Hospital
- Leisure Centre
- Secondary School/ college
- Train Station

Lilac Tree Lodge to Buxton Drive Bus stop approximately 38 minutes

Lilac Tree Lodge to Priory Meadow Bus Stop approximately 30 minutes

Lilac Tree Lodge to Maplehurst Road Bus Stop approximately 5 minutes

TITLE

Bus Journey From Lilac Tree Lodge To Hastings and Bexhill-On-Sea

CLIENT
Rurban Estates Limited

PROJECT
Land adjacent to Little Brans, 124 Hastings Road, Battle, East Sussex

SCALE AT A3	DATE	JOB NO.	DRWG NO.
1:37,000	May 2025	33738	G-04



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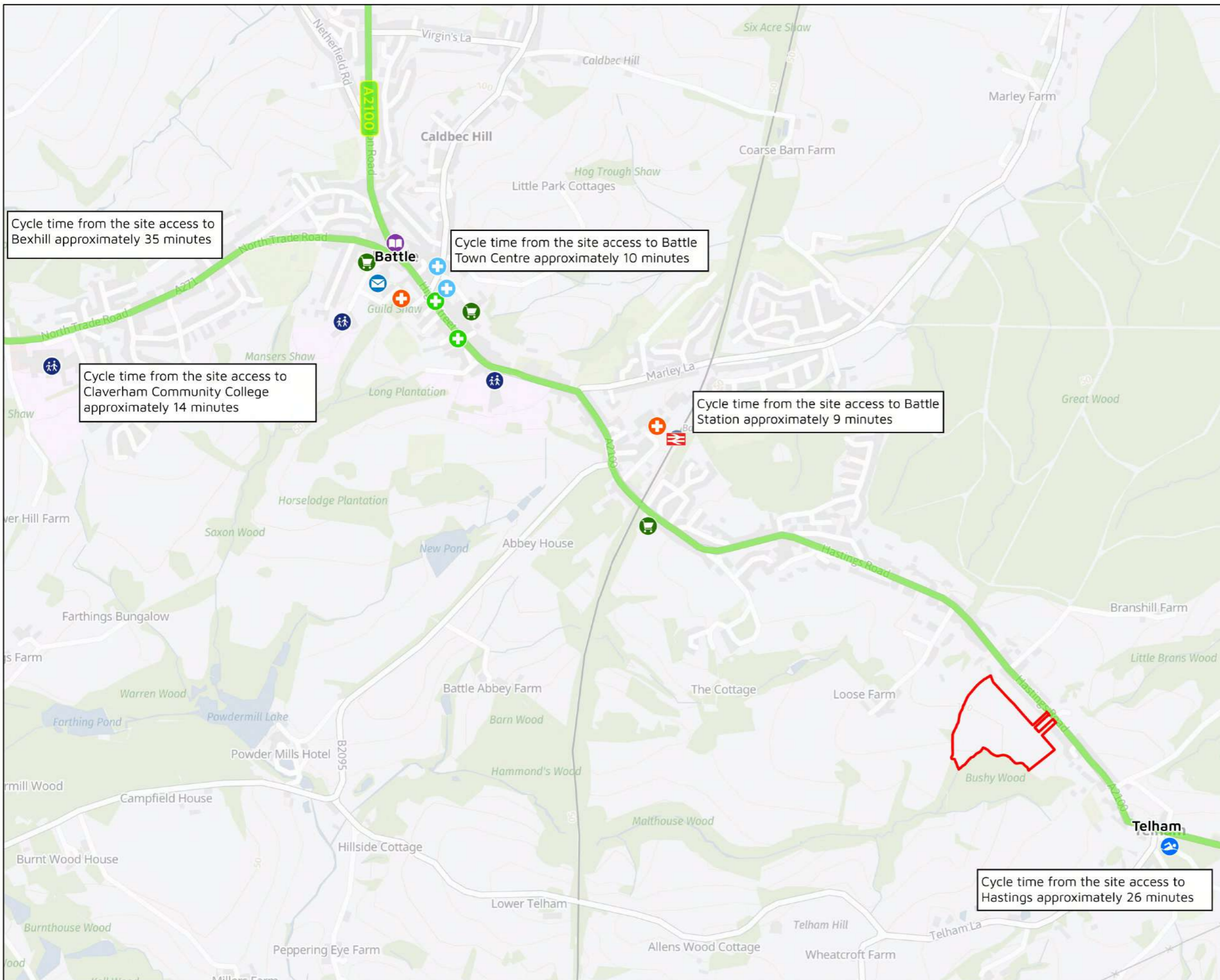
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










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Key

-  Site Location
-  A Roads
-  Dentist
-  Library
-  Pharmacy
-  GP Surgery
-  Post Office
-  School
-  Places Of Worship
-  Groceries
-  Access to Crowhurst Park gym/leisure
-  Battle Station

TITLE
Cycle Times In Battle From The Site

CLIENT
Rurban Estates Limited

PROJECT
Land adjacent to Little Brans, 124 Hastings Road, Battle, East Sussex

SCALE AT A3	DATE	JOB NO.	DRWG NO.
1:12,000	May 2025	33738	G-05



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APPENDIX
D



Explore the score

Square ID 576650_114650

Local authorities Rother
East Sussex

Latitude 50.904298

Longitude 0.511027



Overall

Type	National score	National distribution
Overall (except driving)	39	Below average (30-40%)
Public transport	45	Slightly below average (40-50%)
Walking	27	Low (20-30%)
Cycling	54	Slightly above average (50-60%)
Driving	78	High (70-80%)

Education

Type	National score	National distribution
Overall (except driving)	20	Low (20-30%)
Public transport	35	Below average (30-40%)
Walking	5	Lowest (0-10%)
Cycling	37	Below average (30-40%)

Type	National score	National distribution
Driving	62	Above average (60-70%)

Leisure

Type	National score	National distribution
Overall (except driving)	47	Slightly below average (40-50%)
Public transport	50	Slightly above average (50-60%)
Walking	39	Below average (30-40%)
Cycling	62	Above average (60-70%)
Driving	85	Very high (80-90%)

Health

Type	National score	National distribution
Overall (except driving)	29	Low (20-30%)
Public transport	41	Slightly below average (40-50%)
Walking	12	Very low (10-20%)
Cycling	46	Slightly below average (40-50%)
Driving	76	High (70-80%)

Shopping

Type	National score	National distribution
Overall (except driving)	40	Slightly below average (40-50%)
Public transport	44	Slightly below average (40-50%)
Walking	32	Below average (30-40%)
Cycling	58	Slightly above average (50-60%)

Type	National score	National distribution
Driving	84	Very high (80-90%)

Residential

Type	National score	National distribution
Overall (except driving)	48	Slightly below average (40-50%)
Public transport	52	Slightly above average (50-60%)
Walking	42	Slightly below average (40-50%)
Cycling	63	Above average (60-70%)
Driving	75	High (70-80%)

Workplaces

Type	National score	National distribution
Overall (except driving)	44	Slightly below average (40-50%)
Public transport	47	Slightly below average (40-50%)
Walking	30	Below average (30-40%)
Cycling	53	Slightly above average (50-60%)
Driving	66	Above average (60-70%)

APPENDIX
E





Audit Code: aa59064e-fe2a-4005-98f2-bdd0eee21a4d

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use: 03 - RESIDENTIAL

Category: A - HOUSES PRIVATELY OWNED

Selected Vehicle Type: Total Vehicles

Selected regions and areas:

02	SOUTH EAST		
	CT	CENTRAL BEDFORDSHIRE	1 day
	ES	EAST SUSSEX	3 days
	EX	ESSEX	1 day
	HC	HAMPSHIRE	3 days
	HF	HERTFORDSHIRE	1 day
	KC	KENT	1 day
	SC	SURREY	1 day
	WS	WEST SUSSEX	3 days
03	SOUTH WEST		
	DC	DORSET	1 day
04	EAST ANGLIA		
	NF	NORFOLK	5 days
	SF	SUFFOLK	1 day
09	NORTH		
	DH	DURHAM	2 days
	IM	ISLE OF MAN	1 day
13	MUNSTER		
	CL	CLARE	1 day
14	LEINSTER		
	WC	WICKLOW	1 day
15	GREATER DUBLIN		
	DL	DUBLIN	1 day
16	ULSTER (REPUBLIC OF IRELAND)		
	CV	CAVAN	1 day
17	ULSTER (NORTHERN IRELAND)		
	AN	ANTRIM	1 day
	DE	DERRY	1 day

This section displays the number of survey days per TRICS® sub-region in the selected set.



Audit Code: aa59064e-fe2a-4005-98f2-bdd0eee21a4d

Primary Filtering Selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter:	DWELLS
Actual Range:	50 to 99 (units:DWELLS)
Range Selected by User:	50 to 100 (units:DWELLS)
Parking Spaces Range:	6 - 2824

Public Transport Provision:

Selection by:	All Surveys Included
Date Range:	01/01/16 to 30/06/25

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Friday	6 days
Monday	6 days
Thursday	4 days
Tuesday	8 days
Wednesday	6 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	28
Direction ATC Count	2

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines

Selected Locations:

Edge of Town	22 days
Suburban Area	8 days

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Industrial Zone	1 days
No Sub Category	4 days
Out of Town	1 days
Residential Zone	24 days

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Inclusion of Servicing Vehicle Counts:

Servicing vehicles Excluded	1 days
Servicing vehicles Included	9 days
Servicing vehicles Unknown	20 days



Audit Code: aa59064e-fe2a-4005-98f2-bdd0eee21a4d

Secondary Filtering Selection:

Use Class:

C3 30 surveys

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order (England) 2020 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 500m Range:

220 - 6103

Population within 1 mile:

1,001 to 5,000	3 surveys
10,001 to 15,000	11 surveys
15,001 to 20,000	4 surveys
20,001 to 25,000	1 surveys
25,001 to 50,000	1 surveys
5,001 to 10,000	10 surveys

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

100,001 to 125,000	1 surveys
125,001 to 250,000	7 surveys
25,001 to 50,000	7 surveys
250,001 to 500,000	1 surveys
5,001 to 25,000	6 surveys
50,001 to 75,000	4 surveys
75,001 to 100,000	4 surveys

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

0.6 to 1.0	7 surveys
1.1 to 1.5	21 surveys
1.6 to 2.0	2 surveys

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.



Audit Code: aa59064e-fe2a-4005-98f2-bdd0eee21a4d

Petrol filling station:

This data displays the number of surveys within the selected set that include petrol filling station activity, and the number of surveys that do not.

Travel Plan:

No	14 surveys
Yes	16 surveys

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

2 - Poor	1 surveys
No PTAL Present	29 surveys

This data displays the number of surveys within the selected set that include petrol filling station activity, and the number of surveys that do not.

COVID-19 Restrictions:

No



Audit Code: aa59064e-fe2a-4005-98f2-bdd0eee21a4d

1	AN-03-A-10	DETACHED & SEMI-DETACHED	ANTRIM	
FERRARD GRANGE ANTRIM Suburban Area Residential Zone Number of dwellings: 87.00 DWELLS Survey date: Friday 07/06/2024				
				Survey Type: Manual
2	CL-03-A-02	PRIVATELY OWNED HOUSES	CLARE	
GORT ROAD ENNIS LIFFORD Suburban Area Residential Zone Number of dwellings: 76.00 DWELLS Survey date: Friday 25/10/2024				
				Survey Type: Manual
3	CT-03-A-03	MIXED HOUSES	CENTRAL BEDFORDSHIRE	
ARLESEY ROAD STOTFOLD Edge of Town Residential Zone Number of dwellings: 73.00 DWELLS Survey date: Tuesday 27/06/2023				
				Survey Type: Manual
4	CV-03-A-02	DETACHED & SEMI DETACHED	CAVAN	
R212 DUBLIN ROAD CAVAN KILLYNEBBER Edge of Town No Sub Category Number of dwellings: 80.00 DWELLS Survey date:				
				Survey Type: Manual
5	DC-03-A-09	MIXED HOUSES	DORSET	
A350 SHAFTESBURY Edge of Town No Sub Category Number of dwellings: 50.00 DWELLS Survey date: Friday 19/11/2021				
				Survey Type: Manual
6	DE-03-A-05	SEMI-DETACHED & TERRACED	DERRY	
CLOYFIN ROAD COLERAINE LOGUESTOWN IND. ESTATE Edge of Town Industrial Zone Number of dwellings: 51.00 DWELLS Survey date: Friday 20/05/2022				
				Survey Type: Manual
7	DH-03-A-01	SEMI DETACHED	DURHAM	
GREENFIELDS ROAD BISHOP AUCKLAND Suburban Area Residential Zone Number of dwellings: 50.00 DWELLS Survey date: Tuesday 28/03/2017				
				Survey Type: Manual
8	DH-03-A-03	SEMI-DETACHED & TERRACED	DURHAM	
PILGRIMS WAY DURHAM Edge of Town				



Audit Code: aa59064e-fe2a-4005-98f2-bdd0eee21a4d

Residential Zone Number of dwellings: 57.00 DWELLS Survey date: Friday 19/10/2018 Survey Type: Manual			
9 R124 MALAHIDE SAINT HELENS Edge of Town Residential Zone Number of dwellings: 65.00 DWELLS Survey date: Wednesday 20/06/2018 Survey Type: Manual	DL-03-A-10	SEMI DETACHED & DETACHED	DUBLIN
10 RATTLE ROAD NEAR EASTBOURNE STONE CROSS Edge of Town Residential Zone Number of dwellings: 99.00 DWELLS Survey date: Wednesday 05/06/2019 Survey Type: Manual	ES-03-A-05	MIXED HOUSES & FLATS	EAST SUSSEX
11 NEW ROAD HAILSHAM HELLINGLY Edge of Town Residential Zone Number of dwellings: 91.00 DWELLS Survey date: Thursday 07/11/2019 Survey Type: Manual	ES-03-A-07	MIXED HOUSES & FLATS	EAST SUSSEX
12 THE FAIRWAY NEWHAVEN Edge of Town Residential Zone Number of dwellings: 85.00 DWELLS Survey date: Tuesday 22/04/2025 Survey Type: Manual	ES-03-A-22	MIXED HOUSES	EAST SUSSEX
13 MANOR ROAD CHIGWELL GRANGE HILL Edge of Town Residential Zone Number of dwellings: 97.00 DWELLS Survey date: Survey Type: Manual	EX-03-A-02	DETACHED & SEMI-DETACHED	ESSEX
14 CANADA WAY LIPHOOK Suburban Area Residential Zone Number of dwellings: 62.00 DWELLS Survey date: Tuesday 19/11/2019 Survey Type: Manual	HC-03-A-23	HOUSES & FLATS	HAMPSHIRE
15 DAIRY ROAD ANDOVER Edge of Town Residential Zone Number of dwellings: 73.00 DWELLS Survey date: Tuesday 16/11/2021 Survey Type: Manual	HC-03-A-27	MIXED HOUSES	HAMPSHIRE



Audit Code: aa59064e-fe2a-4005-98f2-bdd0eee21a4d

16 REDFIELDS LANE FLEET CHURCH CROOKHAM Edge of Town Residential Zone Number of dwellings: 50.00 DWELLS Survey date: Wednesday 27/03/2024	HC-03-A-37	MIXED HOUSES	HAMPSHIRE	Survey Type: Manual
17 BAKER STREET POTTERS BAR Suburban Area Residential Zone Number of dwellings: 92.00 DWELLS Survey date:	HF-03-A-07	MIXED HOUSES & BUNGALOWS	SHERTFORDSHIRE	Survey Type: Manual
18 NEW CASTLETOWN ROAD DOUGLAS Suburban Area Residential Zone Number of dwellings: 73.00 DWELLS Survey date:	IM-03-A-04	MIXED HOUSES	ISLE OF MAN	Survey Type: Manual
19 HYTHE ROAD ASHFORD WILLESBOROUGH Suburban Area Residential Zone Number of dwellings: 51.00 DWELLS Survey date: Thursday 14/07/2016	KC-03-A-03	MIXED HOUSES & FLATS	KENT	Survey Type: Manual
20 WOODFARM LANE GORLESTON-ON-SEA Edge of Town Residential Zone Number of dwellings: 55.00 DWELLS Survey date: Tuesday 21/09/2021	NF-03-A-25	MIXED HOUSES & FLATS	NORFOLK	Survey Type: Manual
21 HEATH DRIVE HOLT Edge of Town Residential Zone Number of dwellings: 91.00 DWELLS Survey date: Wednesday 22/09/2021	NF-03-A-26	MIXED HOUSES	NORFOLK	Survey Type: Manual
22 NORWICH ROAD SWAFFHAM Edge of Town Out of Town Number of dwellings: 80.00 DWELLS Survey date: Tuesday 27/09/2022	NF-03-A-34	MIXED HOUSES	NORFOLK	Survey Type: Manual
23 LONDON ROAD WYMONDHAM Edge of Town	NF-03-A-36	MIXED HOUSES	NORFOLK	



Audit Code: aa59064e-fe2a-4005-98f2-bdd0eee21a4d

DESELECTED SURVEYS

Site Ref	Survey Date	Reason for Deselection
TI-03-A-01 17-06-2021	17-06-2021	Covid-19



Audit Code: aa59064e-fe2a-4005-98f2-bdd0eee21a4d

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

Total Vehicles

Calculation factor: 1 DWELLS

*BOLD print indicates peak (busiest) period

Time Range	No. Days	Ave. DWELLS	Arrivals	Departures	Totals
00:00-01:00					
01:00-02:00					
02:00-03:00					
03:00-04:00					
04:00-05:00					
05:00-06:00					
06:00-07:00					
07:00-08:00	30	74	0.091	0.300	0.391
08:00-09:00	30	74	0.164	0.396	0.560
09:00-10:00	30	74	0.161	0.191	0.352
10:00-11:00	30	74	0.145	0.171	0.316
11:00-12:00	30	74	0.141	0.167	0.308
12:00-13:00	30	74	0.192	0.170	0.362
13:00-14:00	30	74	0.198	0.201	0.399
14:00-15:00	30	74	0.199	0.209	0.408
15:00-16:00	30	74	0.285	0.202	0.487
16:00-17:00	30	74	0.291	0.195	0.486
17:00-18:00	30	74	0.369	0.183	0.552
18:00-19:00	30	74	0.267	0.166	0.433
19:00-20:00	1	97	0.062	0.052	0.114
20:00-21:00	1	97	0.031	0.021	0.052
21:00-22:00					
22:00-23:00					
23:00-00:00					
Total Rates:			2.596	2.624	5.220

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

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Audit Code: aa59064e-fe2a-4005-98f2-bdd0eee21a4d

Parameter Summary:

Trip rate parameter range selected:	50 - 100 (units: DWELLS)
Survey date date range:	14/07/2016 - 22/04/2025
Number of weekdays (Monday-Friday):	30
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	4
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.



Audit Code: a5874919-af6b-4084-b648-b1f6988a371e

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use: 03 - RESIDENTIAL

Category: B - AFFORDABLE/LOCAL AUTHORITY HOUSES

Selected Vehicle Type: Total Vehicles

Selected regions and areas:

03	SOUTH WEST		
	WL	WILTSHIRE	1 day
04	EAST ANGLIA		
	SF	SUFFOLK	1 day
05	EAST MIDLANDS		
	NN	NORTH NORTHAMPTONSHIRE	1 day
07	YORKSHIRE & NORTH LINCOLNSHIRE		
	KS	KIRKLEES	1 day
	RM	ROTHERHAM	1 day
08	NORTH WEST		
	MS	MERSEYSIDE	1 day
11	SCOTLAND		
	DU	DUNDEE CITY	1 day
13	MUNSTER		
	TI	TIPPERARY	1 day

This section displays the number of survey days per TRICS® sub-region in the selected set.

Audit Code: a5874919-af6b-4084-b648-b1f6988a371e

Primary Filtering Selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter:	DWELLS
Actual Range:	14 to 68 (units:DWELLS)
Range Selected by User:	10 to 100 (units:DWELLS)
Parking Spaces Range:	14 - 220

Public Transport Provision:	
Selection by:	All Surveys Included
Date Range:	01/01/16 to 30/04/25

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:	
Friday	4 days
Monday	1 days
Tuesday	1 days
Wednesday	2 days

This data displays the number of selected surveys by day of the week.

Selected survey types:	
Manual count	8
Direction ATC Count	0

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines

Selected Locations:	
Edge of Town	2 days
Suburban Area	6 days

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:	
Residential Zone	8 days

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Inclusion of Servicing Vehicle Counts:	
Servicing vehicles Excluded	1 days
Servicing vehicles Unknown	7 days



Audit Code: a5874919-af6b-4084-b648-b1f6988a371e

Secondary Filtering Selection:

Use Class:

C3 8 surveys

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order (England) 2020 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 500m Range:

284 - 5500

Population within 1 mile:

15,001 to 20,000	2 surveys
20,001 to 25,000	1 surveys
25,001 to 50,000	2 surveys
5,001 to 10,000	3 surveys

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

125,001 to 250,000	4 surveys
25,001 to 50,000	1 surveys
250,001 to 500,000	1 surveys
5,001 to 25,000	1 surveys
50,001 to 75,000	1 surveys

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

0.6 to 1.0	2 surveys
1.1 to 1.5	6 surveys

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.



Audit Code: a5874919-af6b-4084-b648-b1f6988a371e

Petrol filling station:

This data displays the number of surveys within the selected set that include petrol filling station activity, and the number of surveys that do not.

Travel Plan:

No 8 surveys

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present 8 surveys

This data displays the number of surveys within the selected set that include petrol filling station activity, and the number of surveys that do not.

COVID-19 Restrictions:

No



Audit Code: a5874919-af6b-4084-b648-b1f6988a371e

1	DU-03-B-01	TERRACED BUNGALOWS	DUNDEE CITY
307-441 BALUNIE DRIVE DUNDEE DOUGLAS & ANGUS Suburban Area Residential Zone Number of dwellings: 68.00 DWELLS Survey date: Friday 21/04/2017			
			Survey Type: Manual
2	KS-03-B-02	TERRACED HOUSES	KIRKLEES
SYKES CLOSE BATLEY Edge of Town Residential Zone Number of dwellings: 17.00 DWELLS Survey date: Friday 19/10/2018			
			Survey Type: Manual
3	MS-03-B-02	SEMI DETACHED/TERRACED	MERSEYSIDE
ST MARY'S GROVE BOOTLE Suburban Area Residential Zone Number of dwellings: 14.00 DWELLS Survey date: Wednesday 06/09/2023			
			Survey Type: Manual
4	NN-03-B-01	SEMI-DETACHED HOUSES	NORTH NORTHAMPTONSHIRE
OCCUPATION ROAD CORBY Suburban Area Residential Zone Number of dwellings: 21.00 DWELLS Survey date: Wednesday 13/10/2021			
			Survey Type: Manual
5	RM-03-B-01	HERRINGTHORPE CLOSE & DUKES PLACE	ROTHERHAM
HERRINGTHORPE VALLEY ROAD ROTHERHAM HERRINGTHORPE Suburban Area Residential Zone Number of dwellings: 44.00 DWELLS Survey date:			
			Survey Type: Manual
6	SF-03-B-02	MIXED HOUSES & FLATS	SUFFOLK
OLD NORWICH ROAD IPSWICH WHITTON Edge of Town Residential Zone Number of dwellings: 60.00 DWELLS Survey date: Friday 08/11/2024			
			Survey Type: Manual
7	TI-03-B-01	MIXED HOUSES	TIPPERARY
LIMERICK ROAD NENAGH Suburban Area Residential Zone Number of dwellings: 43.00 DWELLS Survey date: Friday 27/05/2016			
			Survey Type: Manual
8	WL-03-B-01	TERRACED HOUSES	WILTSHIRE
BUTTERFIELD DRIVE AMESBURY			



Audit Code: a5874919-af6b-4084-b648-b1f6988a371e

Suburban Area
Residential Zone
Number of dwellings: 54.00 DWELLS
Survey date: Tuesday 18/09/2018

Survey Type: Manual



Audit Code: a5874919-af6b-4084-b648-b1f6988a371e

TRIP RATE for Land Use 03 - RESIDENTIAL/B - AFFORDABLE/LOCAL AUTHORITY HOUSES

Total Vehicles

Calculation factor: 1 DWELLS

**BOLD print indicates peak (busiest) period*

Time Range	No. Days	Ave. DWELLS	Arrivals	Departures	Totals
00:00-01:00					
01:00-02:00					
02:00-03:00					
03:00-04:00					
04:00-05:00					
05:00-06:00					
06:00-07:00					
07:00-08:00	8	40	0.078	0.202	0.280
08:00-09:00	8	40	0.215	0.383	0.598
09:00-10:00	8	40	0.193	0.246	0.439
10:00-11:00	8	40	0.140	0.162	0.302
11:00-12:00	8	40	0.128	0.125	0.253
12:00-13:00	8	40	0.143	0.131	0.274
13:00-14:00	8	40	0.156	0.153	0.309
14:00-15:00	8	40	0.168	0.181	0.349
15:00-16:00	8	40	0.305	0.181	0.486
16:00-17:00	8	40	0.324	0.174	0.498
17:00-18:00	8	40	0.287	0.221	0.508
18:00-19:00	8	40	0.187	0.153	0.340
19:00-20:00					
20:00-21:00					
21:00-22:00					
22:00-23:00					
23:00-00:00					
Total Rates:			2.324	2.312	4.636

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

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Audit Code: a5874919-af6b-4084-b648-b1f6988a371e

Parameter Summary:

Trip rate parameter range selected:	10 - 100 (units: DWELLS)
Survey date date range:	27/05/2016 - 14/04/2025
Number of weekdays (Monday-Friday):	8
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	0
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

APPENDIX

5



Land West of Hastings Road, Battle

Landscape and Visual Appraisal
June 2025

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This document has been prepared and checked in accordance with ISO 9001:2015.

1.0 Introduction

This document sets out the preliminary findings and recommendations of the **Landscape and Visual Appraisal** ('LVA') that has been undertaken in support of the promotion of the proposed residential development at the *Land West of Hastings Road, Battle* ('the Site').

The purpose of this document is to consider the ability of the Site and its context to accommodate new residential development; identify the potential landscape and visual effects arising from the Proposed Development; and highlight opportunities to mitigate and avoid potential adverse effects; and bring forward local landscape enhancements where possible.

The LVA has been undertaken by *LDA Design*, the appointed landscape architects for *Rurban Estates* (who are the promoter of the Site).

The LVA has been prepared to support a call for sites submission and representations to the Regulation 18 Local Plan consultation to Rother District Council ('RDC') and will form the basis of subsequent Landscape and Visual Impact Assessment ('LVIA'), should a planning application be submitted in the future.

2.0 The Site and its Landscape Context

The Site is situated immediately to the south-west of Hastings Road, Battle, a linear historic market town located in the Rother District of East Sussex. The settled area lies within a broad swathe of farmland that is north of the town of Hastings. **Figure 1** places the Site in its local context.

The Site comprises a single field parcel, which encompasses an approximate area of 5.5 hectares ('ha'). It is enclosed on nearly all sides by established vegetation. Only where the Site borders the adjoining properties along Hastings Road (and their curtilages), is the boundary comparatively open, albeit it is delineated by a mixture of shrub, trees and fences.

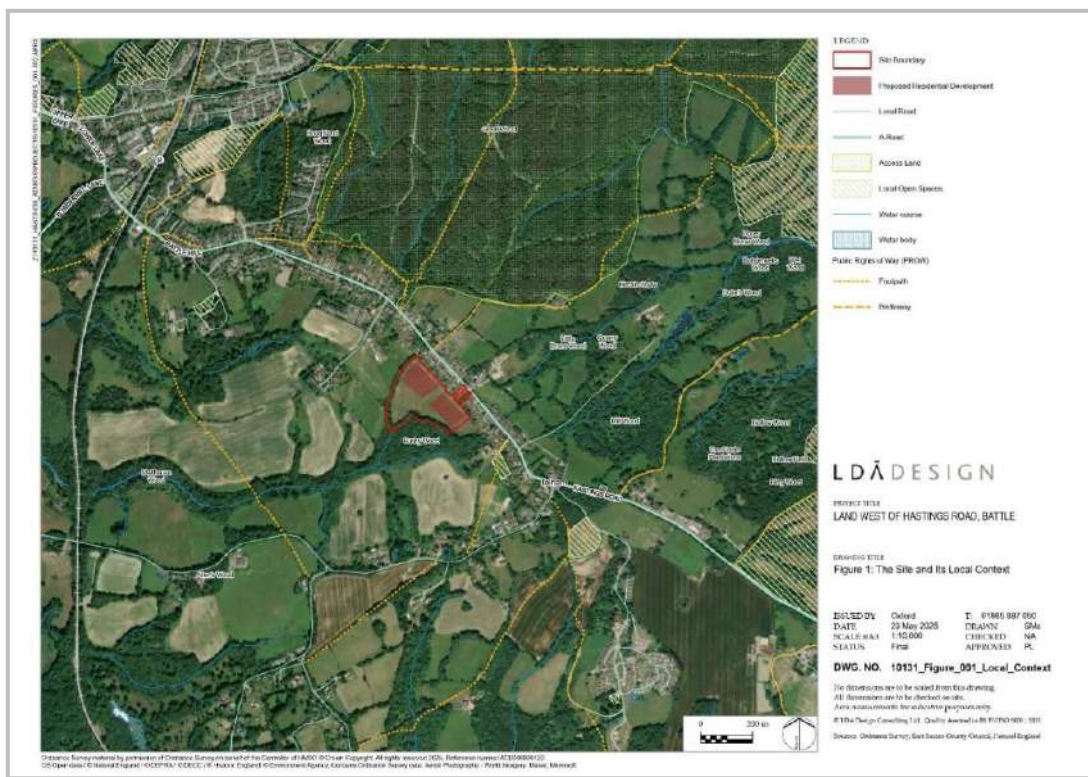


Figure 1: The Site and its Local Context¹

¹ A full-size copy of this Figure is appended to the end of this document.

The **Site's northern and eastern boundaries** are defined by a combination of vegetation and fencing that delineate the curtilages of neighbouring properties that back onto the Site.

Plate 1 and **Plate 2** illustrates the northern and eastern boundaries, and their present relationship between the Site and the adjoining homes.

Beyond these boundaries, the northern side of Hastings Road is lined by a line of dwellings. A variety of shrub, trees, and woodland vegetation surround these properties and characterise the broader landscape to the north of Hastings Road. Notable features to the north of the Site include the expansive woodland of Great Wood alongside smaller woodlands such as Mill Wood and Ring Wood/Alder Wood. Rising and undulating landform is characteristic of the local area beyond the Site.



Plate 1: The Site's northern boundary



Plate 2: The Site's eastern boundary

The **Site's southern and western boundaries** are defined by a combination of established tree and shrub vegetation, consisting of species native to the area. The Ancient Wood – Bushy Wood – borders the Site's southern boundary.

Further to the Site's south and west, the landscape is distinguished by undulating topography characterised by a mosaic of medium to large agricultural fields, which are typically bordered by well-vegetated edges. These fields are situated between populated areas such as Battle, Catsfield, and Crowhurst.

Plate 3 shows the southern boundary of the Site, with a glimpse of the undulating landscape beyond (to the right of the image). **Plate 4** illustrates the Site's western boundary and the established shrub and tree vegetation along it.



Plate 3: The Site's southern boundary



Plate 4: The Site's western boundary

Overall, the Site is visually enclosed by several natural features, and views to it are generally confined to its immediate context. The Site is contiguous with the defined settlement boundary of Battle and is influenced by both the adjoining urban and rural areas.

An analysis of the Site and its surroundings is presented in more detail in **Sections 4.0 to 6.0**.

3.0 Landscape Policy & Designations

3.1. Landscape Planning Policy

RDC is in the process of preparing a new Local Plan and undertook a high level regulation 18 consultation in Q1 2024/25. A focused consultation on sites is targeted to take place in Quarter 4 2025/26.

In accordance with the recently published NPPF (December 2024), the Local Plan must meet the Local Housing Need informed by the standard methodology, which for Rother equates to 908 dwellings per annum.

The current adopted development plan for the area comprises the following:

- **Rother Local Plan Core Strategy** (adopted 29th September 2014);
- **Development and Site Allocations Development Plan Document** (adopted December 2019); and
- **Battle Civil Parish Neighbourhood Plan 2019 - 2028** (made November 2021).

Those policies pertinent to this LVA's purpose are listed below

3.1.1. Rother Local Plan Core Strategy (2014)

Policy OSS2: Use of Development Boundaries outlines how "Development Boundaries around settlements will continue to differentiate between areas where most forms of new development would be acceptable and where they would not." However, this policy makes clear that existing boundaries will be reviewed in the Development and Site Allocations DPD ('DaSA'), considering different factors, such as [inter alia]:

- *Existing pattern, form and function of settlements, including of closely 'linked' settlements and important 'gaps' of countryside between them*
- *Character and settings of individual towns and villages*
- *Sensitivity to further development both within the main built up confines and in more rural fringes*
- *The amount of land needed to fulfil development needs and requirements*
- *Environmental considerations, including the need to conserve designated areas of national and local landscape, archaeological, geological, ecological or historical importance*
- *Following physical features, unless this may suggest a potential for development that is inappropriate*

Policy OSS3 Location of Development outlines the criteria for assessing the suitability of a particular location for development, when both allocating land for development and determining planning applications, sites and/or proposals, making clear that it should accord with the relevant policies of the Core Strategy. The criteria are to be considered in the context of the following [inter alia]:

- *The spatial strategy for the particular settlement or area, and its distinct character*
- *Making effective use of land within the main built-up confines of towns and villages, especially previously developed land, consistent with maintaining their character*
- *The deliverability of development, including consideration of land ownership patterns and the viability of development*

Policy OSS4 General Development Considerations outlines the additional criteria for new development, in support of Policies OSS2 and OSS3, which is as follows [inter alia]:

- *It does not unreasonably harm the amenities of adjoining properties*
- *It respects and does not detract from the character and appearance of the locality*
- *It is compatible with both the existing and planned use of adjacent land, and takes full account of previous use of the site*
- *In respect of residential development, is of a density appropriate to its context, having due regard to the key design principles*

Policy EN1 Landscape Stewardship states how the management of the high quality historic, built and natural landscape character of the district is to be achieved by ensuring the protection, and wherever possible enhancement, of the district's nationally designated and locally distinctive landscapes and landscape features. This policy identifies the distinctive identified landscape character, ecological features, and settlement pattern of the High Weald National Landscape, in which the Site is located (see **Section 3.3** below).

Furthermore, the policy identifies key assets of the district, including:

- *Open landscape between clearly defined settlements, including the visual character of settlements, settlement edges and their rural fringes; [...]*
- *Ancient woodlands;*
- *Tranquil and remote areas, including the dark night sky;*

- *Other key landscape features across the district, including native hedgerows, copses, field patterns, ancient routeways, ditches and barrows, and ponds and water courses.*

Policy EN3 Design Quality sets out the requirements for new development to satisfy and be considered of a high design quality. Those requirements relevant to landscape and visual resources are considered by this LVA, and set out below for reference [inter alia]:

- *Contributing positively to the character of the site and surroundings, including taking opportunities to improve areas of poor visual character or with poor townscape qualities, and*
- *Demonstrating robust design solutions tested against the following Key Design Principles as appropriate (expanded in Appendix 4), tailored to a thorough and empathetic understanding of the particular site and context.*

Policy EN5 Biodiversity and Green Space outlines how the new development is firstly required to protect and enhance the biodiversity, geodiversity and green spaces of its site, taking due consideration of the district-wide network of green infrastructure and the international, national and locally designated sites within the district. It also sets out how the development should seek to ensure that development retains, protects and enhances habitats of ecological interest; and that developers are to integrate biodiversity into development schemes by avoiding adverse impacts from development on biodiversity or habitat, or where wholly unavoidable, provide appropriate mitigation against or compensation for any losses.

Policy BA1: Policy Framework for Battle states that Proposals for development and change in Battle will [inter alia]:

- *(i) Maintain the essential physical form, local distinctiveness, character and setting of the town, particularly in and adjacent to the Conservation Area; [...]*
- *(iii) Provide for 475-500 net additional dwellings in Battle over the Plan period 2011-2028, by developing new housing via opportunities both within the development boundary, and modest peripheral expansion opportunities that respects the setting of Battle within the High Weald AONB and supports community facilities; [...]*
- *(ix) Seek opportunities for habitat creation, restoration and enhancement, particularly in identified Biodiversity Opportunity Areas to the east and west of the town.*

3.2.1. Development and Site Allocations Development Plan Document (2019)

Policy DEN1: Maintaining Landscape Character outlines how the siting, layout and design of development should maintain and reinforce the natural and built landscape character of the area in which it is to be located, based on a clear understanding of the distinctive local landscape characteristics, in accordance with Core Strategy Policy EN1. The policy emphasises the need to maintain the sense of tranquillity of more remote areas, including through maintaining 'dark skies' in accordance with *Policy DEN7 Environmental Pollution*.

Policy DEN2: The High Weald Area of Outstanding Natural Beauty (AONB) sets out how all development within or affecting the setting of the High Weald AONB shall conserve and seek to enhance its landscape and scenic beauty, having particular regard to the impacts on its character components, as set out in the High Weald AONB Management Plan. Development within the High Weald AONB should be small-scale, in keeping with the landscape and settlement pattern; major development will be inappropriate except in exceptional circumstances.

3.2.2. Battle Civil Parish Neighbourhood Plan 2019 - 2028 (2021)

Policy HD4: Quality of Design outlines the requirement for all new development to plan positively for high-quality, inclusive design. Proposals must demonstrate how they conserve local distinctiveness and the aesthetic qualities of traditional rural settlements and buildings, particularly within conservation areas and their settings. Development that reflects connections between people and place - through appropriate density, scale, massing, landscape, and biodiversity - will be supported. Moreover, sympathetic and innovative design approaches that accord with the *Battle CP Design Guidelines* and the *High Weald Housing Design Guide*, will also be supported.

Policy HD5: Protection of Landscape Character mandates that development proposals with the potential to affect the landscape must be informed by a landscape and visual assessment. This assessment should identify the site's key characteristics and views likely to be impacted and inform appropriate landscape mitigation measures. The policy emphasises the importance of incorporating landscape design at an early stage of the development process to ensure that new features are well integrated and reflect the landscape character of their setting. This approach should deliver locally distinctive and contextually appropriate design solutions that also support biodiversity. In addition, the policy outlines expectations for integrating development

sympathetically within its surroundings; enhancing the setting of new buildings; creating high-quality environments; and promoting sensitive, high-quality landscaping that reflects local character and distinctiveness. It advocates for the use of native species of local provenance, where possible, and requires mechanisms to secure the long-term management of soft landscape elements.

Policy HD6: Integration of New Housing states how proposals for new housing must ensure that the new homes are visually integrated with their surroundings.

Policy EN2: Conservation of the Natural Environment, Ecosystems and Biodiversity outlines, relevant landscape and visual resources, how development will not be supported where it would result in the unacceptable loss of, or damage to, hedgerows, ditches, verges, trees, or green spaces - either during construction or as a consequence of the development - unless it can be clearly demonstrated that the benefits of the proposal outweigh the amenity value of the features affected

Policy EN3: The High Weald AONB and Countryside Protection states that development within the High Weald Area of Outstanding Natural Beauty (AONB) will only be supported where it conserves and enhances the natural beauty of the parish and demonstrates regard for the *High Weald AONB Management Plan*. In relation to landscape and visual resources, the policy requires that, where relevant to the proposal or its location, development must:

- *Reflect the historic settlement pattern of the neighbourhood, utilise local materials that enhance visual quality, and support woodland management;*
- *Avoid the loss or degradation of Ancient Woodland or its historic features, and, where appropriate, contribute to its ongoing management; and*
- *Conserve and enhance the ecological function and productivity of fields, trees, and hedgerows; retain and reinstate historic field boundaries; and avoid development within medieval or earlier field systems, particularly where these form part of a coherent historic landscape.*

3.4. Landscape Designations

The Site is located within the **High Weald National Landscape**, a nationally protected landscape recognised for its unique and historic character. The entire settlement of Battle, and the immediate surrounding countryside, are also located within the High Weald National Landscape. The **Rother Local Plan Core Strategy** reports that the National Landscape covers 82% of the district.

RDC, along with other public bodies and statutory undertakers, have a legal duty under Section 85 of the Countryside and Rights of Way Act 2000 to seek to further the purposes (to conserve and enhance the natural beauty) of the National Landscape.

The **High Weald AONB Management Plan 2024-2029**² defines what is meant by 'natural beauty' in the High Weald, setting objectives for the management of the area. The Plan is adopted by all 15 councils with land in the High Weald (including RDC) and is a 'material consideration' in all planning applications. Several supporting publications provide guidance on how to conserve and enhance the landscape of the National Landscape; help understanding its 'natural beauty' and how proposals can respond to their surroundings.

The Natural Beauty Indicators of the High Weald, for the Site, are summarised below.

- **Natural Systems (Geology, Soils, Water and Climate):** The High Weald National Landscape is characterised by a deeply incised, ridged and faulted landform of clays and sandstone creating soils which are highly variable over short distances. The ridges tend east-west, and from them spring numerous gill streams that form the headwaters of rivers. Wide river valleys dominate the eastern part of the National Landscape. The landform and water systems are subject to, and influence, a local variant of the British sub oceanic climate.
- **Settlement:** The High Weald National Landscape is characterised by dispersed historic settlements of farmsteads, hamlets, and late medieval villages and market towns founded on trade and non-agricultural rural industries. The landscape setting of these settlements underpins the distinct and picturesque small-scale landscape character, with rolling pastures and small ancient woodlands of the countryside interspersed with the rich clay-tiled roofscapes of historic buildings.

² *The High Weald AONB Management Plan 2024 – 2029*. Accessed 23 May 2025. Available online at: <https://highweald.org/document-library/aonb-management-plan/high-weald-aonb-management-plan-2024-2029/?layout=default>

- **Routeways:** The High Weald National Landscape is characterised by historic routeways (now roads, tracks, bridleways and paths), the oldest being in the form of ridge-top roads and a dense system of radiating droveways. These are often narrow, deeply sunken and edged with trees, hedges, wildflower-rich verges and boundary banks. These locally distinctive lanes and rights of way often display quietness and rurality in their visual and perceptual character, and they are valuable green infrastructure, creating high public accessibility within the National Landscape and good connections between settlements.
- **Woodland:** The High Weald National Landscape is characterised by the great extent of woodland including ancient woods, gills and shaws, the product of traditional long-term management. The nationally important assemblage of ancient woodland in the High Weald has immense wildlife, landscape and historical value, while the wider cumulative visual character of trees and hedgerows dividing small irregular fields is fundamental to the verdant nature and appearance of the landscape.
- **Fieldscape and Heath:** The High Weald National Landscape is characterised by an intricate and scenic mosaic of small, irregularly shaped and productive fields often bounded by hedgerows, shaws and small woodlands and in-field trees, and typically used for livestock grazing and small-scale horticulture; within which can be found distinctive zones of lowland heath and inned / reclaimed river valleys. Predominantly undisturbed and highly productive Grade 3 good agricultural grazing land, reflecting the typical and historic agricultural practices of the area, and as such is intrinsically valuable to the landscape character.
- **Dark Skies:** The High Weald National Landscape is characterised by having some of the darkest skies in the south-east of England. This gives the National Landscape a sense of remoteness and peacefulness and connects the natural environment to the cultural and historic landscape.
- **Aesthetic and Perceptual Qualities:** Aesthetic and perceptual qualities are sense based and are experienced as a result of people's interaction with natural beauty and their immersion in it, within the High Weald's landscape.
- **Land-based Economy and Rural Living:** The High Weald National Landscape is characterised by a broad-based economy but with a significant land-based sector and related community life focused on mixed farming (particularly family farms and smaller holdings), woodland management and rural crafts.

Key considerations for housing development in the National Landscape are set out in **Section 7.0 Responding to the Site and its landscape context**.

No other statutory or non-statutory designated landscapes, protected at a local district level, have been identified within or near the Site.

4.0 Landform, Landcover and Settlement Pattern

Figure 2 illustrates the Site in its local settlement context, showing the landform of the area.

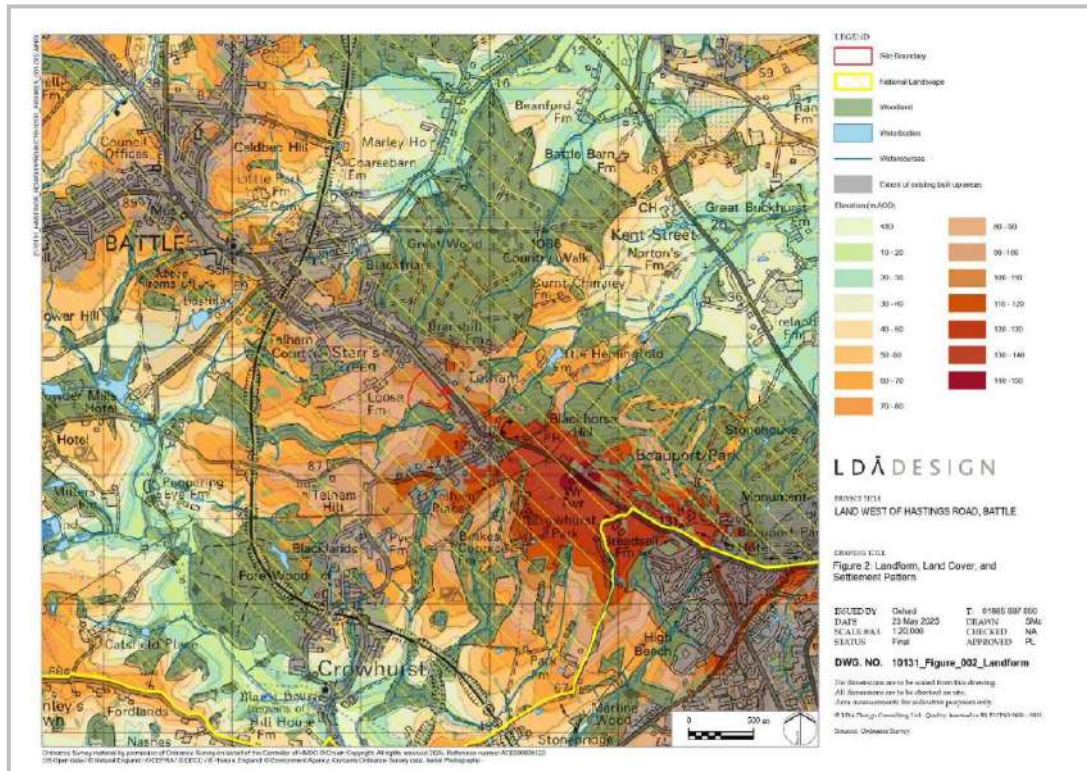


Figure 2: Landform, Landcover and Settlement Pattern³

Battle is a historic market town, exhibiting a broadly nucleated form, that has been built around its historic core and the remains of Battle Abbey. The built form extends outward along principal roads – most notably the A2100 (Battle Hill – Hastings Road) – creating a linear development spine.

Residential development has expanded incrementally from these routes along subsidiary lanes and into cul-de-sacs, characterised by post-war suburban infill and more recent edge-of-settlement housing estates.

The **Rother Local Plan Core Strategy** states that Battle is populated by 5,280 people, but “...provides an important service centre role for its residents and those of surrounding villages. In addition, Battle is a popular tourist destination for domestic and foreign visitors.”

The surrounding landscape is defined by a distinctive landcover and settlement pattern, shaped by the area’s historical evolution and underlying

³ A full-size copy of this Figure is appended to the end of this document.

topography. Located within the High Weald National Landscape, on gently undulating terrain, Battle is encircled by a complex mosaic of ancient woodland, species-rich hedgerows, and small- to medium-scale irregular pastoral fields. This pattern is typical of the medieval field systems that are characteristic of the Wealden landscape (refer to **Section 5.0** for further detail).

The settlement is largely constrained by topography and landscape character, which serve to maintain its compact and rural form. The surrounding landform is interspersed with shaws and ghyll woodlands, frequently occupying steep-sided valleys. These linear woodland features reinforce a strong sense of enclosure, while hedgerows – often containing mature hedgerow trees – define field boundaries and contribute to visual connectivity and biodiversity.

The Site is situated to the south-west of Battle, immediately west of existing dwellings along Hastings Road, and contiguous with the defined settlement boundary. It lies within a wider undulating landform comprising a series of ridges and narrow, incised valleys. A watercourse flows through the centre of the Site on a north-east to south-west alignment, joining a main watercourse within the valley floor. Settlement in Battle and comparable towns / villages, along with the primary road network, typically occupies the ridge lines.

5.0 Landscape Character

5.1. Market Towns and Villages Landscape Assessment (August 2009)

The key characteristics of the Site and its surroundings are detailed in RDC's **Market Towns and Villages Landscape Assessment** (August 2009) ('MTVLA'), which also defines the relative capacity of the landscape around existing settlements to accommodate housing and business development.

The **MTVLA** evaluates the character of the area in terms of its quality, value, sensitivity, and capacity for change – from a landscape and visual perspective – building on the existing landscape character assessments of the area, the *East Sussex County Council Landscape Assessment* (2008).

The Site falls within *B4 Glengorse/Telham (CLA 10 - CombeHaven Valley)* described as follows [inter alia]:

B4 Glengorse/Telham (CLA 10 – Combe Haven Valley)

This area has a strong sense of place. Broad rolling countryside as setting for town and Battle Abbey from some aspects. Some large fields and areas of paddocks around Glengorse. Few detractors. Woodland and open pasture are characteristic with a well wooded appearance and open pasture between. There has been some loss of historic field pattern. Enclosed urban edge. Very quickly in countryside away from town and road noise.

The **MTVLA** goes on to summarise in *Table 5 Landscape Capacity Evaluation Summary - County Landscape Character Area (CLA) 40 – Battle (Volume 2)*, in relation to the character area and its capacity to accept change concerning to housing, the following [inter alia]:

- *Quality: Good – High*
- *Value: High (AONB)*
- *Character sensitivity to changes: High / Moderate close to urban edge*
- *Visual Sensitivity: High / Moderate close to urban edge*

Comments

The areas of Moderate capacity are close to the built up edge of ribbon development on the ridge. This would be in areas which are enclosed by existing woodland areas and tree belts Any development further out would require substantial woodland planting to contain it in this area of remote countryside.

Capacity to accept change (housing): Low – Moderate

LDA Design recognises that the Site and its current features offer an opportunity to integrate residential proposals sympathetically with its surroundings, without adversely impacting other important characteristics of the wider landscape. It is essential to preserve and enhance existing on-site features, and to strengthen field boundaries through new planting. Additionally, the adjacent ancient woodlands should be well protected and further enhanced with additional planting within the Site to support and enhance the prevailing woodland character that characterises this part of Battle's landscape.

6.0 Visual Environment

A preliminary Zone of Theoretical Visibility (“ZTV”), illustrated in **Figure 3**, indicates that while the Site is positioned on comparatively elevated ground and could potentially be visible from surrounding areas, it is generally well-contained visually. This containment is attributed to the prevalent landscape features that immediately surrounding the Site and the undulating topography that characterises the broader landscape.

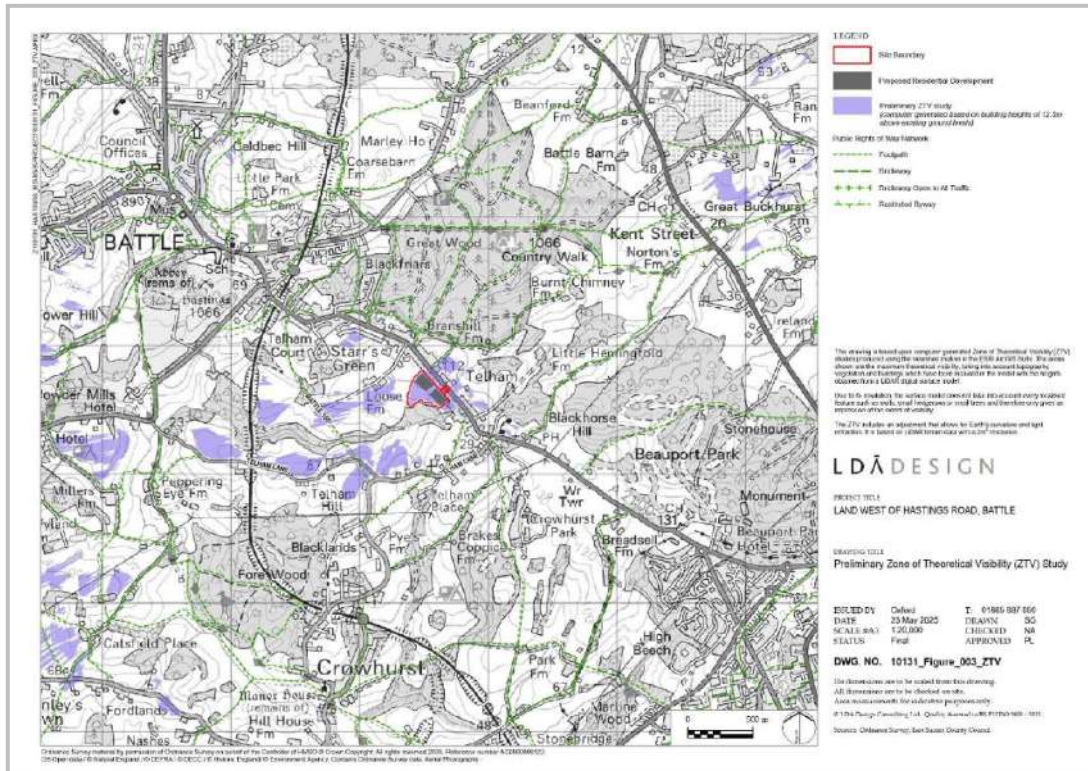


Figure 3: Preliminary Zone of Theoretical Visibility Study⁴

Theoretical visibility of the Site and its proposals are described as follows:

- **To the Site’s north and east:** Visibility is limited to the Site and its immediate surroundings. This limitation arises from screening effects of existing dwellings that line either side of Hastings Road (the A2100). Established garden vegetation further restricts intervisibility. Beyond, visibility of the Site is possible only where gaps occur between the intervening buildings and vegetation along the Site’s north-eastern boundary, and there are few instances of this occurring. This limited visibility is a result of prevalent vegetation in combination with undulations in the intervening landscape. Should views be possible,

⁴ A full-size copy of this Figure is appended to the end of this document.

proposals in the Site would be seen in the context of Battle. **Plate 3** shows the limited visibility towards the Site from Hastings Road.



Plate 3: View southward from Hastings Road

- **To the Site's south and west:** Visibility would extend southward towards Telhams Hill, and Catsfield Place / Peppering Eye Farm, where visibility would be possible from a few locations within the Site's local surroundings. Analysis from the ZTV confirms that potential visibility from the landscape beyond Telham Hill and Catsfield Place / Peppering Eye Farm would be minimal. This is primarily due to the combined screening effect of intervening vegetation and the undulating landform, which significantly obscure long-range views toward the Site. **Plate 4** shows the view from the public rights of way (BAT/100/1) where it joins Telham Lane on Telham Hill.



Plate 4: View from Telham Hill northwards towards the Site

It should be borne in mind that the ZTVs represents a theoretical model of the Proposed Development's potential visibility, which at this stage of the Project is based on assumed building heights of 12.5m above existing ground levels. Therefore, the ZTV only gives an impression of the potential scheme's

extent of the visibility. In reality, due to the resolution of the digital surface model used in the ZTV, some localised features (such as walls, low hedgerows and small trees) are not captured within the dataset used at the time of this appraisal. Consequently, the extent of visibility experienced on-the-ground would be less than suggested by the ZTV as these unaccounted localised features combine to screen the Proposed Development to a greater degree.

Overall, despite the Site's elevated position on the slopes of a narrow valley, established natural features, such as woodlands, tree belts, hedgerows and shrubs, combined with an undulating landform, would limit the Proposed Development's visual impact on the wider landscape as a consequence of the high degree of visual enclosure.

LDA Design identifies opportunities to preserve and enhance the existing landscape features within the Site and its surroundings. This approach ensures that any development on the Site is well integrated into its surroundings and effectively screened from the wider landscape.

7.0 Responding to the Site and its landscape context

The Proposed Development will inevitably transform the Site from an open field into a built environment, altering its land use and character. This change could initially be perceived as adversely affecting sensitive parts of the landscape.

Currently, the Site and its surroundings are characterised by a mosaic of ancient woodland, species-rich hedgerows, and small- to medium-scale irregular pastoral fields. This pattern is typical of the medieval field systems that are characteristic of the Wealden landscape.

The Site adjoins the existing settlement and is visually enclosed from the surrounding settlements / landscape by several natural features, assessed by RDC of be of a *Low – Moderate* capacity to accommodate housing. Additionally, the Site – as is the majority of the district – is situated in a nationally protected landscape recognised for its unique and historic character.

Visually, it is anticipated that any visual effects on views and surroundings would primarily affect the Site and its immediate surroundings, reducing with distance from the Site's extents, with consideration of the emerging concept layout and landscape strategy.

Therefore, with consideration to the unique and historic character of Battle and its surrounding landscape, it is considered that the Site has capacity to accommodate a scheme that is sensitively designed and sympathetic to its surrounding character and visual environment, without any undue effects on existing landscape and / or visual resources. Should the Proposed Development be visible in the wider context during the day and/or night, it will be perceived as part of the broader Battle settlement, with established vegetation in and around the Site acting as natural visual buffers to nearby settlements.

Nonetheless, it remains important for the design of the Proposed Development to carefully address landscape and visual considerations to mitigate potential impacts. This sensitive integration will reinforce the distinct identity of surrounding communities while safeguarding the rural landscape character and broader settlement pattern of the locality.

7.1.2. Design Recommendations for a Landscape-led scheme

The Site presents an opportunity to deliver a landscape-led scheme that would positively contribute to the local area without undue impact on landscape character, visual amenity, or the High Weald National Landscape.

The design and consideration of landscape and visual resources is an iterative process, ensuring that all necessary measures to mitigate adverse effects are incorporated into the proposals from the outset. This approach places the environment at the forefront of the design process, aiming to preserve and enhance existing assets while sensitively integrating new development within its surroundings.

A thorough understanding of the Site and its context has informed the identification of opportunities and constraints, shaping the emerging development. A series of **Landscape Design Principles**, outlined below, support the overarching vision for the Site, creating a strong sense of place and ensuring that any future masterplan is guided by the Site's inherent qualities.

These principles should be read in conjunction with the plans prepared by the Project's masterplanners, *Edge Urban Design*, which have also considered highways, ecology, arboriculture and heritage as part of the consideration of the Site's opportunities and constraints.

The **Landscape Design Principles** seek to achieve the sensitive integration of new development with the existing landscape and local community. The final masterplan will prioritise the preservation and enhancement of on-site vegetation, supporting the incorporation of the new development into its context. The **High Weald Housing Design Guide** emphasises the importance of creating developments that are *"truly 'of the place', a genuine and integrated part of the existing settlement, rather than a generic 'added on' estate"*.

Any future proposals should therefore:

- **Reflect the area's distinctive character**, considering historic settlement patterns and the vernacular architecture of the High Weald alongside the Site's nearest architecture. New dwellings should complement the Site's rising landform; respect the current visual environment of the area; and do not exceed the height of the adjoining woodland or houses.

This approach will create a masterplan that provides opportunities for new open spaces and green infrastructure, which can be carefully designed to contain the visibility of new buildings within the Site and its

immediate vicinity. Consequently, long-range views across the landscape will remain largely unaffected. Particular attention should be paid to areas of the Site that are more visible from the wider landscape, notably the Site's north-western extent. Should 'key views' be identified during the ongoing design process, measures will be taken to protect and maintain them, as far as practicable.

- **Apply appropriate offsets from the Site's boundaries and key on-site features** to ensure their preservation and strengthen the landscape framework. The adjoining ancient woodland is to be safeguarded, ensuring its preservation as a vital natural resource. Additionally, prevailing characteristics of the existing landscape that contribute positively to the rural character of nearby settlements, should be conserved and enhanced wherever possible, including through the incorporation of additional native and local species to support pollinators and birdlife.
- **Introduce new green spaces that integrate with the surrounding landscape**, using existing natural features to foster an attractive, biodiverse environment that encourages positive visual connections to and from the Site.
- **Consider 'dark skies'**, as a recognised and important feature of National Landscapes, and accordingly design any necessary street lighting to minimise and avoid potential 'skyglow'.

8.0 Conclusion

It is acknowledged that there would be inevitable changes to the Site's landscape character and to views would be available to new buildings within the Site's local context.

However, *LDA Design* considers that the Site and its proposals has the capacity to accommodate a sensitively designed scheme for approximately 80 homes, which is sympathetic to the prevailing characteristics of the surrounding landscape; provided the outlined design recommendations for a landscape-led scheme are followed and appropriate mitigation and enhancement measures are incorporated into its final design to address potential landscape and visual effects. The emerging proposals drawn by *Edge Urban Design* presently adhere to a landscape-led approach and the considerations of this LVA.

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LEGEND

- Site Boundary
- Proposed Residential Development
- Local Road
- A-Road
- Access Land
- Local Open Spaces
- Water course
- Water body
- Public Rights of Way (PROW)
- Footpath
- Bridleway

LDĀ DESIGN

PROJECT TITLE
LAND WEST OF HASTINGS ROAD, BATTLE

DRAWING TITLE
Figure 1: The Site and Its Local Context

ISSUED BY	Oxford	T:	01865 887 050
DATE	23 May 2025	DRAWN	SMc
SCALE @A3	1:10,000	CHECKED	NA
STATUS	Final	APPROVED	PL

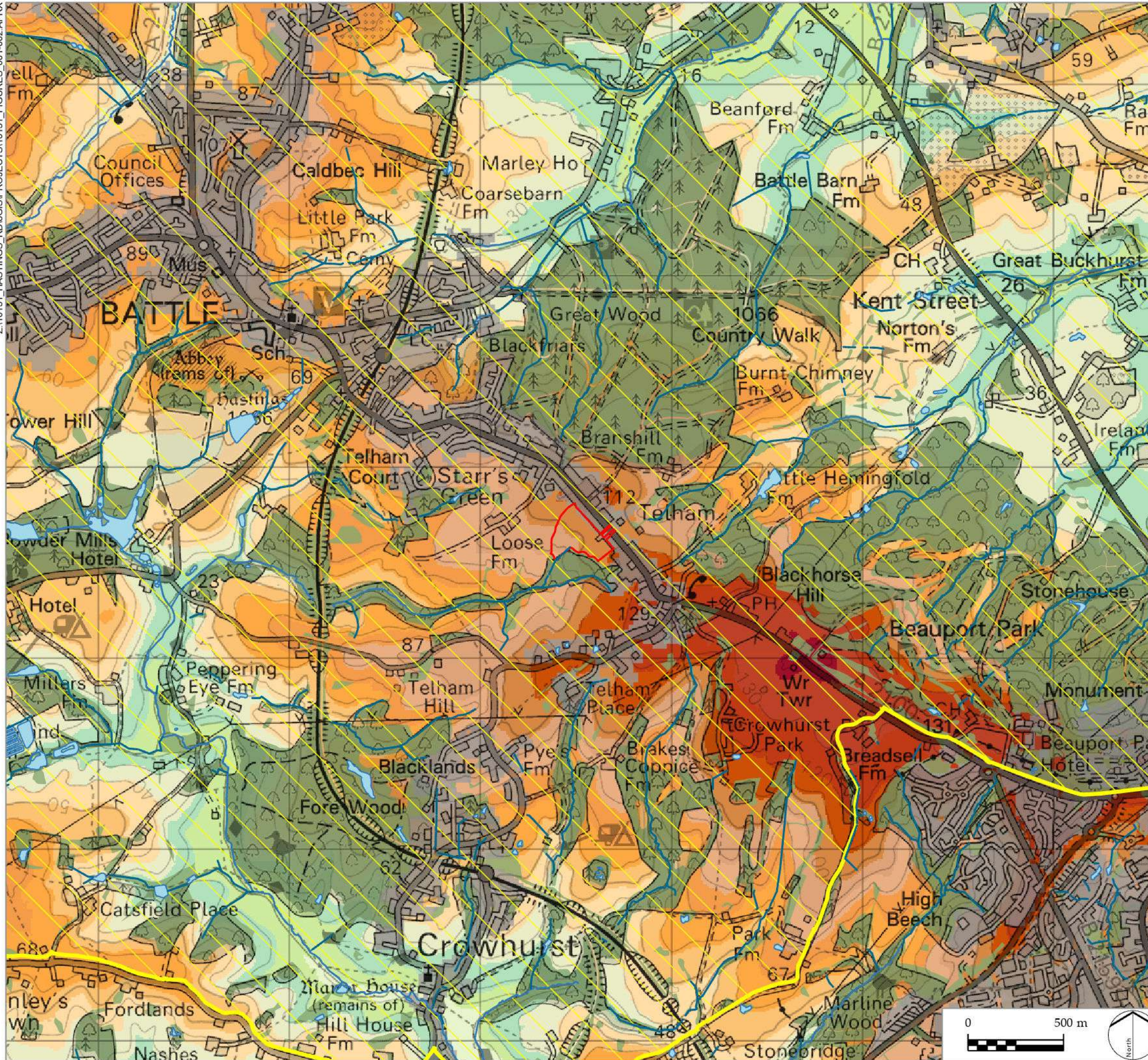
DWG. NO. 10131_Figure_001_Local_Context

No dimensions are to be scaled from this drawing.
All dimensions are to be checked on site.
Area measurements for indicative purposes only.

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Sources: Ordnance Survey, East Sussex County Council, Natural England

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LEGEND

- Site Boundary
- National Landscape
- Woodland
- Waterbodies
- Watercourses
- Extent of existing built-up areas

Elevation (m AOD)

	<10		80 - 90
	10 - 20		90 - 100
	20 - 30		100 - 110
	30 - 40		110 - 120
	40 - 50		120 - 130
	50 - 60		130 - 140
	60 - 70		140 - 150
	70 - 80		

LDĀ DESIGN

PROJECT TITLE
LAND WEST OF HASTINGS ROAD, BATTLE

DRAWING TITLE
Figure 2: Landform, Land Cover, and Settlement Pattern

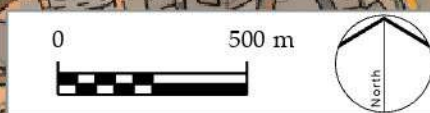
ISSUED BY	Oxford	T: 01865 887 050
DATE	23 May 2025	DRAWN SMc
SCALE @A3	1:20,000	CHECKED NA
STATUS	Final	APPROVED PL

DWG. NO. 10131_Figure_002_Landform

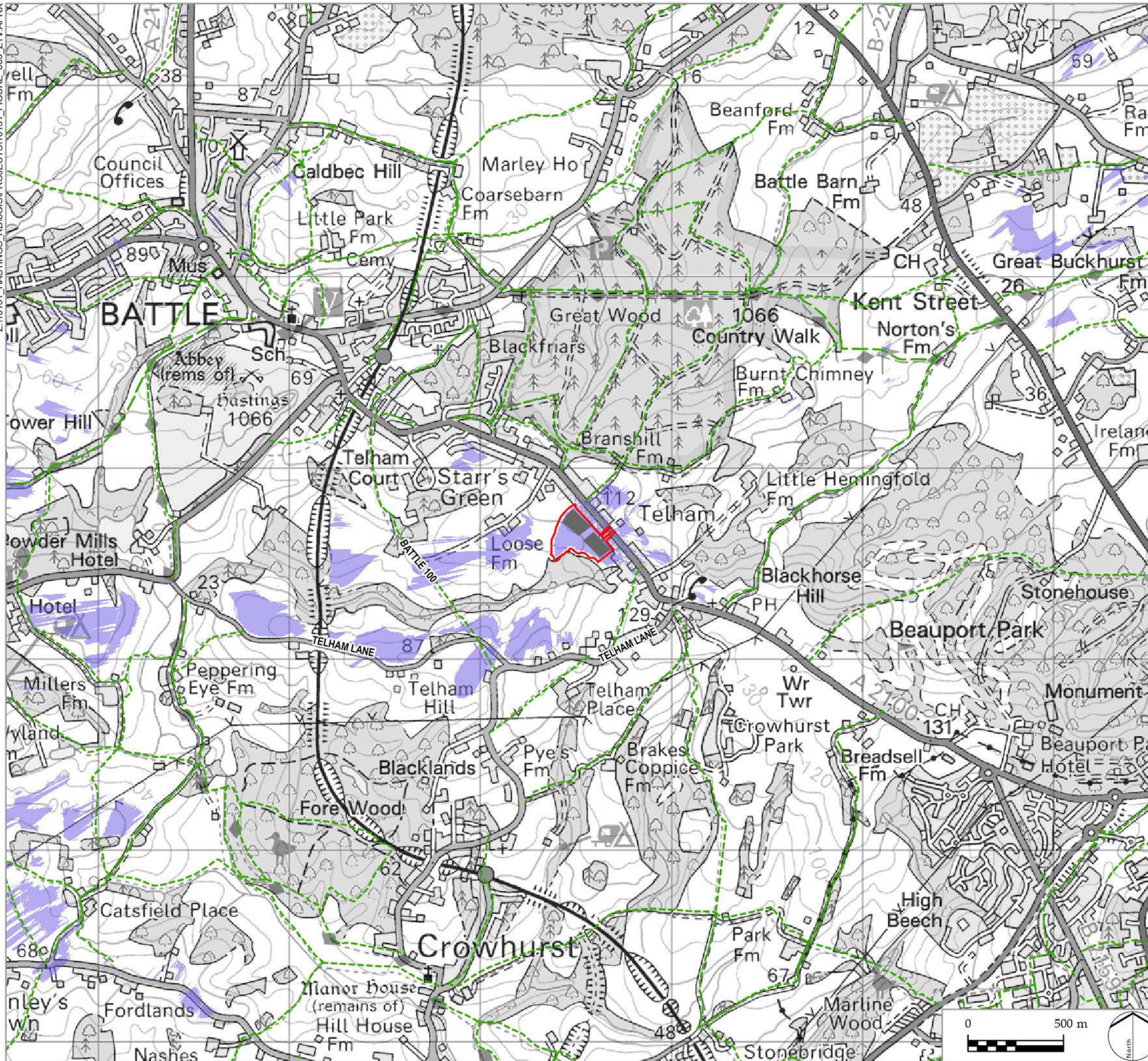
No dimensions are to be scaled from this drawing.
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Sources: Ordnance Survey



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LEGEND

- Site Boundary
 - Proposed Residential Development
 - Preliminary ZTV study
(computer generated based on building heights of 12.5m above existing ground levels)
- Public Rights of Way Network
- Footpath
 - Bridleway
 - Bridleway Open to All Traffic
 - Restricted Byway

This drawing is based upon computer generated Zone of Theoretical Visibility (ZTV) studies produced using the viewshed routine in the ESRI ArcGIS Suite. The areas shown are the maximum theoretical visibility, taking into account topography, vegetation and buildings which have been included in the model with the heights obtained from a LiDAR digital surface model.

Due to its resolution, the surface model does not take into account every localised feature such as walls, small hedgerows or small trees and therefore only gives an impression of the extent of visibility.

The ZTV includes an adjustment that allows for Earth's curvature and light refraction. It is based on LiDAR terrain data with a 2m² resolution.

LDĀ DESIGN

PROJECT TITLE
LAND WEST OF HASTINGS ROAD, BATTLE

DRAWING TITLE
Preliminary Zone of Theoretical Visibility (ZTV) Study

ISSUED BY	Oxford	T: 01865 887 050
DATE	23 May 2025	DRAWN SG
SCALE @A3	1:20,000	CHECKED NA
STATUS	Final	APPROVED PL

DWG. NO. 10131_Figure_003_ZTV

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Area measurements for indicative purposes only.

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Sources: Ordnance Survey, East Sussex County Council