

**ROTHER LOCAL PLAN
2025-2042 –
DEVELOPMENT
STRATEGY AND SITE
ALLOCATIONS
CONSULTATION
RESPONSE
GROVE FARM, PHASE 2**

Table of Contents

1.0	Introduction	1
2.0	Progress Update	2
3.0	Review of Draft Allocation Requirements (Policy RB3) (Question 57)	4
4.0	Responses to Consultation Questions	7
5.0	Conclusions	10
Appendix 1		
SITE LOCATION PLAN		
Appendix 2		
DRAFT MASTERPLAN		
Appendix 3		
ACCESS REVIEW TECHNICAL NOTE		
Appendix 4		
HIGHWAYS PRE-APP RESPONSE		

1.0 Introduction

- 1.1 This representation is submitted by Bidwells LLP on behalf of our client, Exeter College, the owners of the land identified as “Land at Grove Farm (Phase 2), Robertsbridge”. Our client’s site is identified for proposed allocation under emerging Policy RB3.
- 1.2 We write to express our overarching support for the proposed allocation of this site for residential development within the Rother Local Plan 2025-2042. This support is provided subject to technical clarifications and refinements related to specific ‘site requirements’ in the draft allocations, most notably the preferred vehicular access strategy. We return to this later in our response under **Section 3**.
- 1.3 Land at Grove Farm (Phase 2), Robertsbridge is identified under Policy RB3 of the draft Rother Local Plan 2025-2042. The site as identified at **Figure 1** (and Appendix 1) is a 4.01-hectare site sustainably located on the southeastern edge of the village, situated between the consented ‘Phase 1’ development (application refs RR/2022/283/P and RR/2022/1850/P) and the A21 bypass which defines the settlement edge.
- 1.4 In summary, the proposed draft allocation identifies a provisional residential capacity of 70 new dwellings, with 1.5 hectares reserved for green infrastructure and an indicative development density of c. 35 dwellings per hectare.

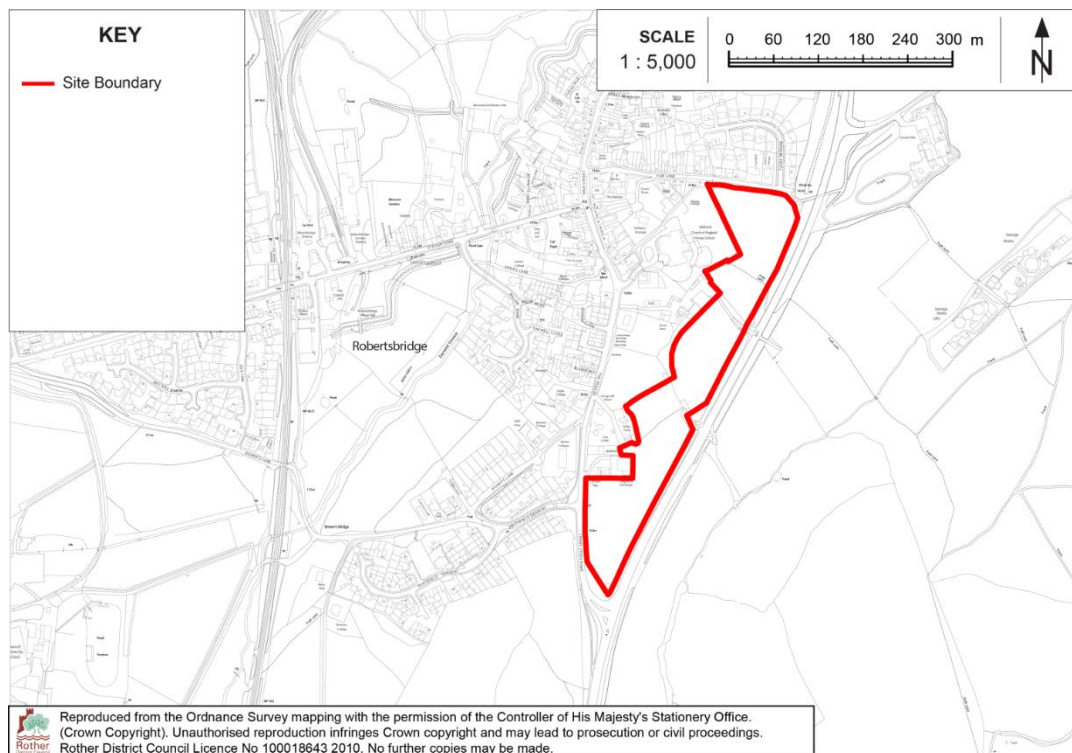


Figure 1 – Draft Allocation Boundary for Grove Farm, Phase 2 (Policy RB3)

2.0 Progress Update

- 2.1 Exeter College has issued formal responses to previous stages of Local Plan preparation, including the first draft Regulation-18 Plan. We welcome the opportunity to respond to this latest Site Allocations Consultation and to engage in future stages of Local Plan preparation.
- 2.2 Further to engagement in the Local Plan process, Exeter College c/o Bidwells LLP have proactively progressed through one stage of pre-application engagement with Rother District Council (RDC) (Ref: PE/00157/2024) to review draft proposals for the Phase 2 site. The feedback received to date has been largely positive, confirming that the principle of residential development on the site is supported, subject to ongoing refinements to designs and site layout.
- 2.3 Based on this engagement and supporting technical studies prepared in support of the Pre-app process, it has been demonstrated that the site has capacity to accommodate up to 70 no. dwellings as per the draft masterplan at **Figure 2** (and Appendix 2). This quantum represents a sustainable optimisation of the site that balances housing delivery with the identified landscape and urban design constraints. We are currently preparing for further pre-application engagement and look forward to discussing these matters with policy officers as the Local Plan progresses.
- 2.4 Further to the pre-application planning meeting, more recently highways engagement has also taken place, including a formal meeting with East Sussex County Council (ESCC) Highways on 24 November 2025. Technical assessments have identified feasible access arrangements, and the highways pre-application process has indicated support for a dedicated primary vehicular access off George Hill. Three potential access location options were identified with the aim of ensuring the site can operate independently from the Phase 1 development. One option will be carried forwards in the designs but is yet to be selected, and discussions with the highways authority in this respect are ongoing.



Figure 2 – Draft Masterplan

3.0 Review of Draft Allocation Requirements (Policy RB3) (Question 57)

- 3.1 The emerging Local Plan Site Allocations Consultation identifies a series of ‘site requirements’ which should be adhered to in bringing residential sites forward for development.
- 3.2 The following table reviews the proposed site requirements for Policy RB3 as set out in the draft Local Plan. In summary, whilst Exeter College **supports** the majority of these points, **technical clarification** is required regarding the proposed access strategy under **Site Requirement 3**. Until such time as this matter is adequately resolved our client wishes to maintain a holding objection to this particular site requirement.

Table 1 – Review of Draft Site Requirements and Responses on Behalf of Exeter College

REQUIREMENT NO.	DRAFT SITE REQUIREMENT	RESPONSE ON BEHALF OF EXETER COLLEGE
1	Provide policy-compliant on-site affordable housing.	Support. Exeter College is committed to providing policy compliant affordable housing in line with emerging policy.
2	Informed by a landscape sensitivity assessment for layout and design.	Support. A landscape and visual study has already been commissioned to minimise impact on the High Weald National Landscape. A full LVIA will accompany the final proposals.
3	Include vehicular access from George Hill via the approved Grove Farm Phase 1 development.	<p>Object. The Phase 1 development has planning approval for primary site access from George Hill serving 32 dwellings. However, this access has yet to be constructed and at the time of writing the site is under separate land ownership.</p> <p>While we acknowledge the Council’s preference for the development to be served from a single site access, the Phase 2 scheme is a standalone proposal under separate land ownership, and it is therefore essential for the site’s deliverability that the draft site allocation does not preclude the ability to deliver a dedicated primary site access off George Hill.</p> <p>Technical work undertaken by Motion consultants (see Appendix 3) and pre-app engagement with ESCC (see Appendix 4) supports the provision of a standalone access</p>

		<p>point from George Hill to ensure the sites independent deliverability. Earlier technical responses to the HELAA from the highways authority also confirm the suitability of taking site access from a standalone access on George Hill, although we recognise the need to keep access points to a minimum therefore only one additional access point will be selected. At this stage three potential candidate access locations have been identified. Access through Phase 1 is not considered reasonable as this would not be deliverable without third party land.</p> <ul style="list-style-type: none"> - Option 1 – simple priority junction onto George Hill, south of the existing junction with George Hill/Heathfield Gardens; - Option 2 – simple priority junction onto George Hill, north of the existing junction with George Hill/Heathfield Gardens; and - Option 3 – simple priority junction onto George Hill, midway between Orchard Flats access and the existing junction with George Hill/Heathfield Gardens. <p>Thus far the highways authority have expressed preference for Option 2, however Option 1 has not been ruled out subject to further technical clarification.</p> <p>In the current draft plans, access through the consented Phase 1 scheme is preferred as an emergency or secondary access only. A dedicated access independent of the first phase will ensure that this site remains deliverable in the event that the consented scheme were not to be implemented. This will ensure the site contributes to much needed housing in the context of local shortfall in 5-year housing land supply. This will also benefit the design of the scheme by routing vehicular traffic away from residential areas and prioritising pedestrian and cycle connectivity through the Phase 1 scheme.</p>
4	Include pedestrian infrastructure to George Hill and Fair Lane.	<p>Support. Pedestrian and cycle links are central to connecting the site to village services and public transport. These are shown in the current designs.</p>

5	Include 1.5 hectares of Green Infrastructure (southern and northern sections).	Support. The current draft layout reserves the sensitive northern and southern fields for open space, amenity, and biodiversity net gain as per this site requirement.
6	Account for Southern Water underground infrastructure and easements.	Support. Future site layouts will continue to respect necessary easements for existing water infrastructure, which are already accounted for in draft designs.
7	Provide sustainable drainage (SuDS) to manage surface water runoff.	Support. Topographical analysis confirms the site is suitable for gravity-fed SuDS in the northern field, as shown in draft designs.
8	Include a pedestrian connection to Public Right of Way (PROW) 46.	Support. This connection is integrated into the site's sustainable transport strategy and can be accommodated in the proposed plans.
9	Include an archaeological survey across the whole site.	Support. A desk-based archaeological study has been undertaken, and we agree a full desktop report should be provided with any planning application.
10	Retain and enhance the eastern boundary hedgerow and trees.	Support. Trees along the edge of the A21 bypass will be retained and enhanced where possible with additional boundary planting to retain a soft buffer to the settlement edge.
11	Lighting designed in accordance with Policy LAN3 (Dark Skies).	Support. Future detailed designs will demonstrate compliance with National Landscape dark skies standards.
12	Design to ensure residents are not adversely impacted by A21 noise.	Support. Acoustic studies have informed an iterative design process. Where possible building orientation and soft landscape will be prioritised to minimise noise levels. Where this is not possible, alternative options including acoustic screening to minimise garden noise levels should not be precluded provided the landscape impact is acceptable.
13	Include necessary off-site highway works.	Support. we will continue to work with the LHA to identify and deliver required improvements. The need for mitigation will be informed by the findings of a Transport Assessment.
14	Assessment and evaluation of	Support. Findings will be shared with officers once the ongoing study is complete.

	archaeological potential and mitigation.	
15	Regard to the setting of nearby listed buildings to the northwest.	Support. The scheme is being sensitively designed to minimise impact on the Conservation Area and listed buildings north of Fair Lane.

4.0 Responses to Consultation Questions

Question 2 – 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?

- 4.1 Exeter College acknowledges the Council’s proposed housing target of 8,427 dwellings (495 dwellings annually). While we recognise the significant environmental constraints facing the district - with roughly 90% of the district designated as National Landscape or protected habitat- we believe the Council should strive to meet its objectively assessed housing needs in full.
- 4.2 The current target of 495 dpa is a significant shortfall from the standard method figure of 912 net new homes per year. To narrow this gap, the Council must prioritize sustainable locations like Grove Farm, Robertsbridge which benefit from existing rail infrastructure and local services.

Question 5- Do you have any comments on infrastructure needs or priorities to support the proposed Development Strategy? (in the Infrastructure Delivery Plan)

- 4.3 The Infrastructure Delivery Plan (IDP) is a vital tool for coordinating investment and achieving the goal of "Live Well Locally," however we emphasize that it must facilitate, rather than hinder, the deliverability of sustainable development including proposed allocations in the emerging Local Plan. We therefore **support** the IDP in principle **subject to technical clarification**.
- 4.4 While not mentioned explicitly in the IDP, it is important to ensure that the updated surface water management policies of utility providers are implemented pragmatically in Local Plan preparation and decision making. We encourage the Council to ensure these policies do not create undue barriers to development through rigid restrictions related to the consideration of drainage hierarchies, particularly as measures for drainage of surface water through measures such as infiltration are often technically unfeasible in locations like Robertsbridge due to site-specific ground conditions, and not all sites identified for allocation in the emerging plan are proximate to watercourses. Such an approach should not be used to stymie schemes at the Development Management stage on sites that have already been tested at Examination through the Site Allocations Process.
- 4.5 A more pragmatic approach, allowing for low, strictly managed discharge rates where it has been demonstrated that other hierarchy options have been fully exhausted, is essential to maintaining the deliverability of sustainable housing. It would not be appropriate or legally sound in our view

to propose a development management policy which seeks to apply a blanket restriction to state that any surface water discharge into the foul-only network should be refused. Where appropriate, emerging allocations can provide proportionate contributions to help to mitigate infrastructure quality / capacity issues.

Question 6 - Do you have any comments on the Council's assessment of the additional Development Strategy options?

- 4.6 Exeter College **supports** the Council's assessment of Option SDO13 (A21 corridor growth focused within and around existing larger settlements). This option provides a positive strategy for directing growth to sustainable locations like Robertsbridge/Salehurst, which already possess a reasonable level of local services. Conversely, we agree with the rejection of Option SDO14 (Development within strategic gaps), as it would likely undermine the separate identity of settlements and have an adverse impact on the National Landscape.

Question 7: Do you have any comments on the preferred approach for housing density shown in Figure 9, or on the updated Density Study (2026)?

- 4.7 We **strongly support** the "Higher Density" standard (Option B) as the preferred approach. This standard is essential for ensuring the optimal use of land, especially given the district's housing shortfall. Applying Option B allows for a step-change in housing delivery while remaining sensitive to rural character. The allocation of 70 dwellings at Grove Farm Phase 2 (approx. 35 dph) is a reasonable density assumption in our view and is compatible with this approach.

Question 8: Do you have any comments on the Council's proposed Overall Development Strategy?

- 4.8 Exeter College **supports** the Proposed Overall Development Strategy, which combines several sustainable spatial options including SDO4 (Sustainable settlement extensions) and SDO11 (Growth in settlements with railway stations).
- 4.9 Further to the above, to ensure the soundness of the Plan we strongly encourage the Council to confirm through its evidence base that sites such as Grove Farm that are well located and do not give to significant impacts on landscape, do not constitute 'major development' (as per paragraphs 189 and 190 of the NPPF). NPPF 190 says that applications for major development in the National Landscape should be refused unless exceptions apply. Footnote 67 says "major" in this context is a matter for the decision maker.

Question 9: Do you have any comments on the proposed growth opportunities in the sub-areas as shown in Figure 10?

- 4.10 The target of 729 proposed new dwellings for Northern Rother settlements is considered appropriate and sustainable; therefore, we **support** this strategy in principle. This level of growth reflects the presence of high-quality service centres like Robertsbridge, which benefit from mainline rail connections and a range of local facilities. By directing a reasonable proportion of the district's growth to this sub-area, the Council is effectively implementing its "Live Well Locally" priority, ensuring new residents have access to sustainable transport and social opportunities.

- 4.11 The proposed allocation of Grove Farm Phase 2 under Policy RB3 (approximately 70 units) makes a significant and deliverable contribution to meeting housing needs - representing roughly 10% of the total new housing target for the entire Northern Rother sub-area. Our technical studies and pre-application engagement with both Rother District Council and ESCC Highways confirm that this site is a logical extension to Robertsbridge and is capable of supporting this sub-area's growth objectives within the plan period.

Question 14: Do you have any comments on the proposed Vision and development strategy for Northern Rother, including the development figures shown in Figures 26 and 27?

- 4.12 Exeter College expresses **support** for the proposed Vision for Northern Rother. We particularly endorse the focus on directing growth toward the district's most sustainable rural settlements, such as Robertsbridge, which benefit from existing provision of essential village services and the railway station.
- 4.13 Exeter College **supports** the indicative housing figures identified for Northern Rother. The target for new allocations in this sub-area reflects a balanced approach that recognizes the capacity of sustainable settlements to accommodate growth while fulfilling the statutory duty to conserve and enhance the High Weald National Landscape.
- 4.14 Our technical work on land within this sub-area confirms that Northern Rother settlements have the capacity to deliver high-quality, higher-density residential schemes that optimise the use of land without causing landscape harm.

Question 57. Do you have any comments on the proposed site allocations in Robertsbridge, detailed in Policies RB1 to RB6b? In your response, please state which site your comment relates to.

- 4.15 Please see our full responses above under **Section 3** of this Submission. In summary, while we support the proposed residential site allocation of land at Grove Farm Phase 2, we object specifically to Site Requirement 3 in respect of the approach to site access.
- 4.16 The site requirements should not preclude the option of a dedicated primary access point off George Hill to ensure that the proposed allocation is deliverable without the need for third party land. Our engagement with statutory consultees including the highways authority confirm that this stipulation is not necessary and should therefore be removed from the list of site requirements.

Question 66. Do you have any comments on the proposed changes to Policy LWL7 (A) (i) (Streets for All)?

- 4.17 Exeter College **supports** the principles of Policy LWL7 (Streets for All) where they facilitate safe, inclusive, and sustainable transport patterns. For Policy RB3 (Grove Farm Phase 2), the implementation of this policy involves providing high-quality pedestrian and cycle infrastructure to link effectively with George Hill and Fair Lane.

- 4.18 Exeter College maintains that its preferred strategy for a dedicated, standalone vehicular access point off George Hill is the most effective way to deliver the "Streets for All" objectives for this site. Technical engagement with ESCC Highways has confirmed that such a standalone access is feasible in principle.

Question 68. 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)?

- 4.19 We **support** the findings of the Interim Sustainability Appraisal (January 2026), specifically the preferred spatial development strategy. We strongly endorse the Council's decision to pursue options which support development coming forward at Robertsbridge, such as SDO4 (Sustainable settlement extensions) and SDO11 (Growth in settlements with railway stations or sustainable transport alternatives).
- 4.20 Robertsbridge is a highly sustainable location, and Land at Grove Farm (Phase 2) is a logical extension that sits within easy walking distance of essential village services and the mainline railway station. This approach aligns with the Local Plan's "Live Well Locally" priority by directing growth to areas where sustainable transport links and accessibility to social opportunities are already established.

5.0 Conclusions

- 5.1 In conclusion, Exeter College expresses overarching support for the proposed allocation of Land at Grove Farm (Phase 2) under Policy RB3. The site is a deliverable and sustainable extension to Robertsbridge, capable of providing approximately 70 new homes alongside generous open space, enhanced walking and cycling links and biodiversity improvements.
- 5.2 This support is subject to the technical clarifications provided in Section 3, most notably the request to amend the access strategy to allow for a dedicated primary access point off George Hill to ensure the site's independent deliverability.
- 5.3 We look forward to engaging with the Council on the Proposed Submission version of the Local Plan and participating in the 'Regulation 19' stage of consultation, which we understand is expected to take place in Summer 2026.

APPENDIX 1
SITE LOCATION PLAN



Grove Farm Phase 2 (4.0 Ha)
 Grove Farm Phase 1 (.25 Ha)

Brooks Murray Architects
 The Arts Building, Market Place, London N4 3JG
 44 (0)207739955 admin@brooks-murray.com



CLIENT:
 The Rector and Scholars of Exeter Cathedral
 JOB:
 Land at Grove Farm, George Hill
 Robertsbridge
 TN32 5BY
 DRAWING TITLE:
 Site Location Plan

SCALE:
 1:1250 @ A1 / 1:2500 @ A3
 DATE:
 December 2020
 STATUS:
 Draft
 DRAWING NUMBER: 1282-001 REV: - ISSUED BY: JS

APPENDIX 2
DRAFT MASTERPLAN

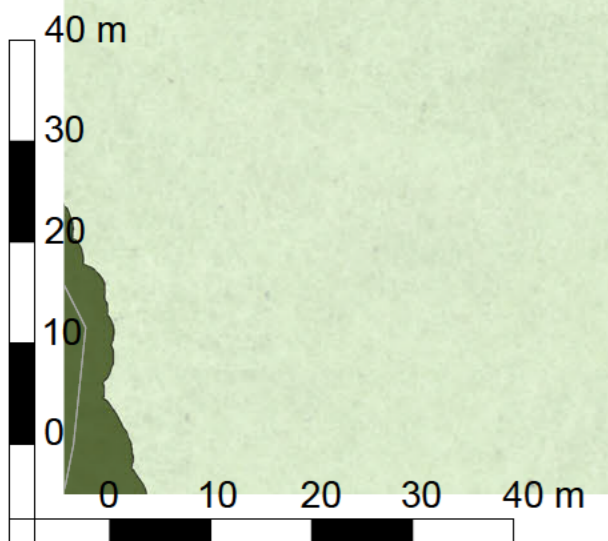


Grove Farm Phase 2
 4.01 hectares
 Grove Farm Phase 1
 Site capacity - 61 dwellings

Brooks Murray Architects
 41 Tabernacle Street, London, EC2A 4AA
 +44 (0)2077399655 admin@brooksmurray.com



CLIENT:
 The Rector and Scholars of Exeter College
 JOB:
 Land at Grove Farm, George Hill
 Robertsbridge
 TN32 5BY
 DRAWING TITLE:
 Residential development - Phase 2
 Illustrative masterplan
 SCALE:
 1:750 @ A1
 DATE:
 January 2025
 STATUS:
 FEASIBILITY
 DRAWING NUMBER: REV: ISSUED BY:
 1282 -101 FF



APPENDIX 3

ACCESS REVIEW TECHNICAL NOTE

Site: Grove Farm, Phase 2
Prepared by: PdeJ
Approved by: PdeJ
Date: 2nd October 2025

1.0 Introduction

- 1.1 Motion have been appointed by The Rector and Scholars of Exeter College to provide transport planning advice for the development of land at Grove Farm, Robertsbridge – Phase 2. The scheme follows on from the Phase 1 proposals for the redevelopment of land to the north of the Grove Farm site within the village of Robertsbridge, in the Rother District Council authority area with East Sussex County Council as Highway Authority.

Rother District Council HELAA – Northern Rother

- 1.2 Rother District Council has developed a draft Housing and Economic Land Availability Assessment (HELAA) dated April 2024 and the documents covers the site assessments of development sites in the parishes of Bodium, Burwash, Etchingam, Hurst Green, Salehurst and Robertsbridge and Ticehurst.
- 1.3 The Grove Farm Phase 2 site is identified in the HELAA document (Chapter 5) as 'SAL0022' and identified as a site available for potential development. The site assessment in the HELAA document states the site is allocated and permitted for residential development for an estimated 35 residential dwellings. With regard to vehicular access, the Council's analysis states:

"The achievement of a safe vehicular access requires further consideration. Initial Highway Authority comments suggest access would need to be from George Hill, with Fair Lane used only for pedestrian and cycle access, and that a Transport Assessment and Travel Plan would be required."

Scheme Background

- 1.4 The application site is surrounded to the north by Salehurst Church of England Primary School, to the west by George Hill and residential development, to the south by the southern development site and beyond that open fields, residential development and a telephone exchange and to the east by surrounding open fields and the A21.
- 1.5 A planning application for this site, was submitted in July 2017 (Rother DC application ref no: RR/2017/1642/P), alongside an application for the southern extent of the same site (Rother DC application ref no: RR/2017/1629/P). The transport matters for these two planning applications were amalgamated into the supporting Transport Statement.
- 1.6 A further planning submission was made for the southern extent of the Phase 1 development (24 dwellings) a reserved matters application (Rother DC application ref no: RR/2022/283/P) with a further reserve matters submission for the northern section (8 dwellings) in 2022 (Rother DC application ref no: RR/2022/1850/P). Both schemes have been approved.
- 1.7 The Phase 2 part of the development seeks to develop more area of the Grove Farm site to the east up to the A21 providing up to 61 dwellings. The general development areas for Phase 1 and Phase 2 are identified on Figure 1.1.

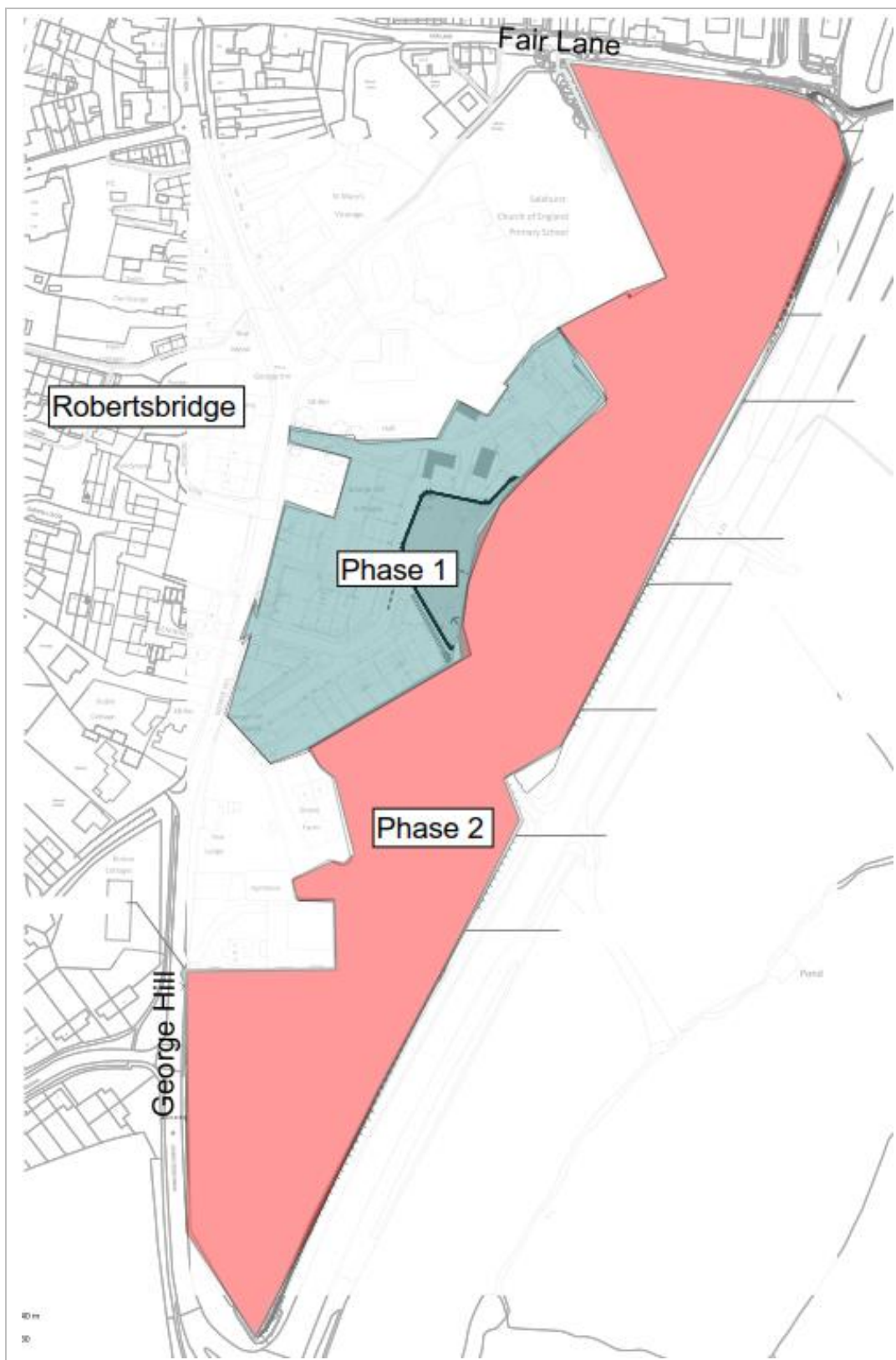


Figure 1.1 – Grove Farm development – Phase 1 & 2

- 1.8 This technical note has been prepared to set out a review of the access options onto the Grove Farm site to serve the Phase 2 development.

2.0 Existing Site Conditions

Site Location

- 2.1 The Phase 2 site is located within Robertsbridge village within the Rother District Council (RDC) authority area. Robertsbridge occupies a strategic position with connections from the village linking to Hastings and Battle to the south along with London, Hawkhurst and Royal Tunbridge Wells to the north.
- 2.2 The village benefits from good access to the strategic road network with the A21 passing the village to the east. The A21 can be accessed to the north of the site, at a roundabout junction with Northbridge Street, the A21 and Church Lane, and to the south of the site at a priority junction between George Hill and the A21. The A21 provides a link northbound to Royal Tunbridge Wells, and beyond to junction 5 of the M25 and Sevenoaks, and provides southbound links towards Hastings, Battle and Bexhill. The strategic site location is shown in Figure 2.1.



Figure 2.1 – Strategic Site Location

- 2.3 The site is bounded to the north by Salehurst Church of England Primary School, to the east by the A21, to the west by George Hill, beyond which residential development is present and to the south The southern extent of the development and beyond that by residential development, a telephone exchange and the A21/George Hill junction.

Pre-app consultation – Rother District Council

- 2.4 The applicant's team has submitted a pack of information to RDC to seek feedback on the allocation of the Phase 2 scheme on the Grove Farm site. The RDC comments are set out in a letter response dated 10th June 2025 and the key transport related comments are as follows:
 - ▶ The access will need to demonstrate adequate visibility can be provided in both directions subject to consultation with East Sussex County Council (ESCC) and National Highways;
 - ▶ The preliminary access presented with the pre-app pack is located south of Heathfield Gardens and in a 50mph. RDC advised that ESCC and National Highways are consulted prior to an application being submitted;
 - ▶ A Transport Statement will need to include other potential Housing and Economic Land Availability Assessment (HELAA) sites nearby;
 - ▶ RDC advise that the approved Phased 1 access is considered to be used for the Phase 2 development;

- ▶ Cycle parking to be considered at an early stage; and
- ▶ Car parking spaces to be 2.5m x 5m in size.

3.0 Development proposals

3.1 The emerging proposal for Phase 2 is to provide up to 70 new dwellings with a mix of houses to reflect the provision of 32 dwellings approved for the Phase 1 scheme. An extract of the draft architectural layout submitted at pre-application stage to Rother District Council is provided in Figure 3.1 with the full plan in [Appendix A](#).



Figure 3.1 – Phase 2 – Proposed development

Access Strategy

- 3.2 The proposed vehicle access strategy for the Phase 2 development is to create a second access, separate from the approved Phase 1 development. The access may have the capacity to accommodate a total of 93 dwellings (32 for Phase 1 and a further 61 for Phase 2) but the favoured approach would be to provide a second access.
- 3.3 The information in the Rother District Council HELAA promotes a new primary access for the Phase 2 site onto George Hill as set out in paragraphs 1.2 and 1.3 of this technical note.
- 3.4 The strategy will also provide the following benefits:
- ▶ A second access can provide future residents and visitors some flexibility in entering/exit; and
 - ▶ the two Phases may be constructed separately allowing site clearance and construction traffic to be kept apart from residents and visitors should one of the Phases be completed before the other.
- 3.5 The Phase 2 access point onto George Hill is proposed as one of three potential locations:
- ▶ Option 1 – simple priority junction onto George Hill, south of the existing junction with George Hill/Heathfield Gardens;
 - ▶ Option 2 – simple priority junction onto George Hill, north of the existing junction with George Hill/Heathfield Gardens; and
 - ▶ Option 3 – simple priority junction onto George Hill, midway between Orchard Flats access and the existing junction with George Hill/Heathfield Gardens.
- 3.6 The options have been considered in more detail and driver visibility splays reviewed.

Option 1 – Access onto George Hill, north of Heathfield Gardens

General

- 3.7 The masterplan has been developed to consider the access options in more detail to include road markings, the bus stop and shelter on George Hill and driver visibility splays based on the displayed speed limits either side of the proposed access.
- 3.8 The access drawing with driver visibility splays is presented on Motion drawing 1903076-101 provided in **Appendix B** (with mark-up extract presented in Figure 3.1).

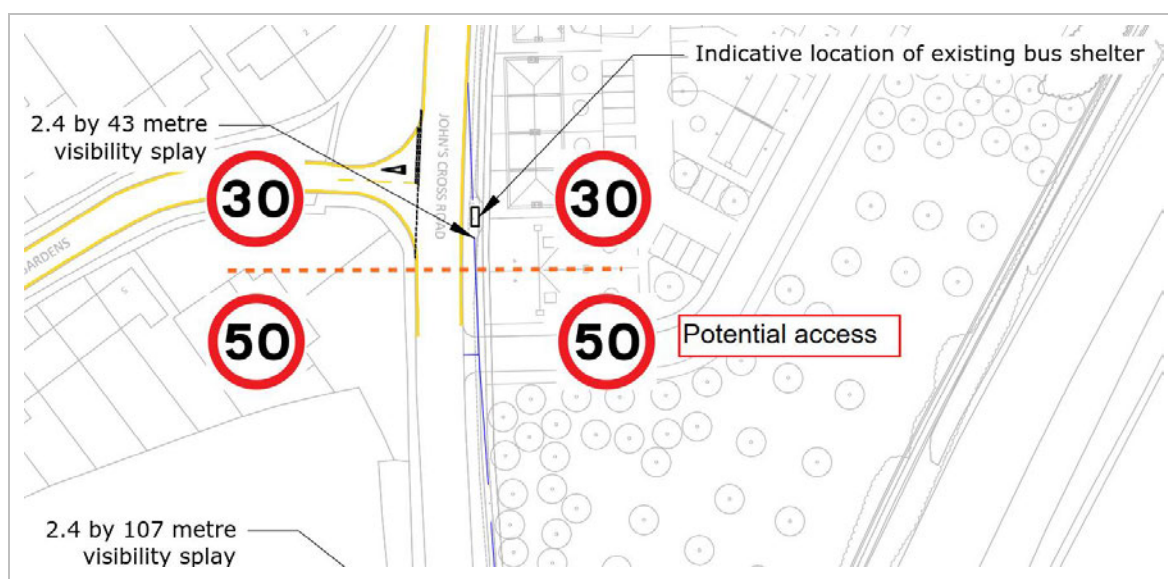


Figure 3.1 – Option 1 access – south of Heathfield Gardens

- 3.9 The driver visibility splays that can be achieved for Option 1 are:
- ▶ 2.4m x 4.3m splay to the north of the access, based on 30mph speed limit; and
 - ▶ 2.4m x 107 m (achievable) splay to the south within the 50mph speed limit.
- 3.10 The splay to the south assumes that drivers will only approach from the northbound lane since it is extremely unlikely that any vehicles will be overtaking on the George Hill/A21 approach lane (southbound towards the by-pass). A splitter island and on-coming traffic will make this manoeuvre almost impossible and any driver driving in this manner should not be in the road.
- 3.11 The Automatic Traffic Count is proposed to be installed in early October 2025 so to record observed vehicle speeds along this section of George Hill. It is unlikely that traffic will be travelling at 50mph in the 50mph zone given northbound traffic will be approaching from A21 and is likely to have slowed down to pull off the main road. Any southbound traffic will be within a 30mph and should be travelling close to 30 mph as the vehicle approaches the Option 1 access.

Review of Option 1

- 3.12 The Option 1 access location has been reviewed in terms of the likely acceptability of the arrangement. The comments are as follows;
- ▶ The driver visibility splay to the north (2.4m x 43m) can be achieved on the basis that the southbound vehicles are approaching at speeds in the order of 30mph.
 - ▶ The existing hedgerows will need to be trimmed back and maintained on a regular basis;
 - ▶ The splay to the north may need to increase if recorded traffic speeds are more than 30mph, drivers leaving the village may accelerate as they approach the 50mph limit. There is some flexibility to increase the splay if required but any restriction will be the hedgerow to the east of George Hill along the site frontage;
 - ▶ The existing bus shelter to the north of the junction appears to block the splay to the north but this is effectively a single screen parallel to George Hill without any sides to obstruct driver visibility.
 - ▶ The driver splay to the south of the Option 1 access (2.4m x 107m) will not meet the required 2.4m x 160m necessary for a 50mph but this could not be achieved in any event since the location of the Option 1 junction is only 150m from the George Hill/A21 Robertsbridge By-pass. The existing hedgerows will need to be trimmed back and maintained on a regular basis as with the visibility to the north; and
 - ▶ It will be necessary to discuss and agree with ESCC and National Highways a departure from standard for the splay to the south. The results from the Automatic Traffic Count may provide information to suggest traffic is travelling slower which could justify a reduced driver visibility splay – traffic would need to be recorded travelling at speeds in the order of 40mph – 43mph.

Summary - Option 1

- 3.13 The delivery of the Option 1 access from George Hill to serve the Phase 2 site will require existing hedgerows to be trimmed and maintained and the delivery of the southern driver visibility splay will require a departure from standard from the local highway authorities unless a reduced traffic speed is recorded as part of the site speed survey. Any trimming of the hedgerow would be in accordance with typical landscaping maintenance.

Option 2 – Access onto George Hill, north of Heathfield Gardens

- 3.14 The Option 2 junction arrangement is presented on Motion drawing 1903076-102 illustrates the potential access location (approximate) and the driver visibility splays. A full plan is provided in **Appendix C** (with mark-up extract presented in Figure 3.2).

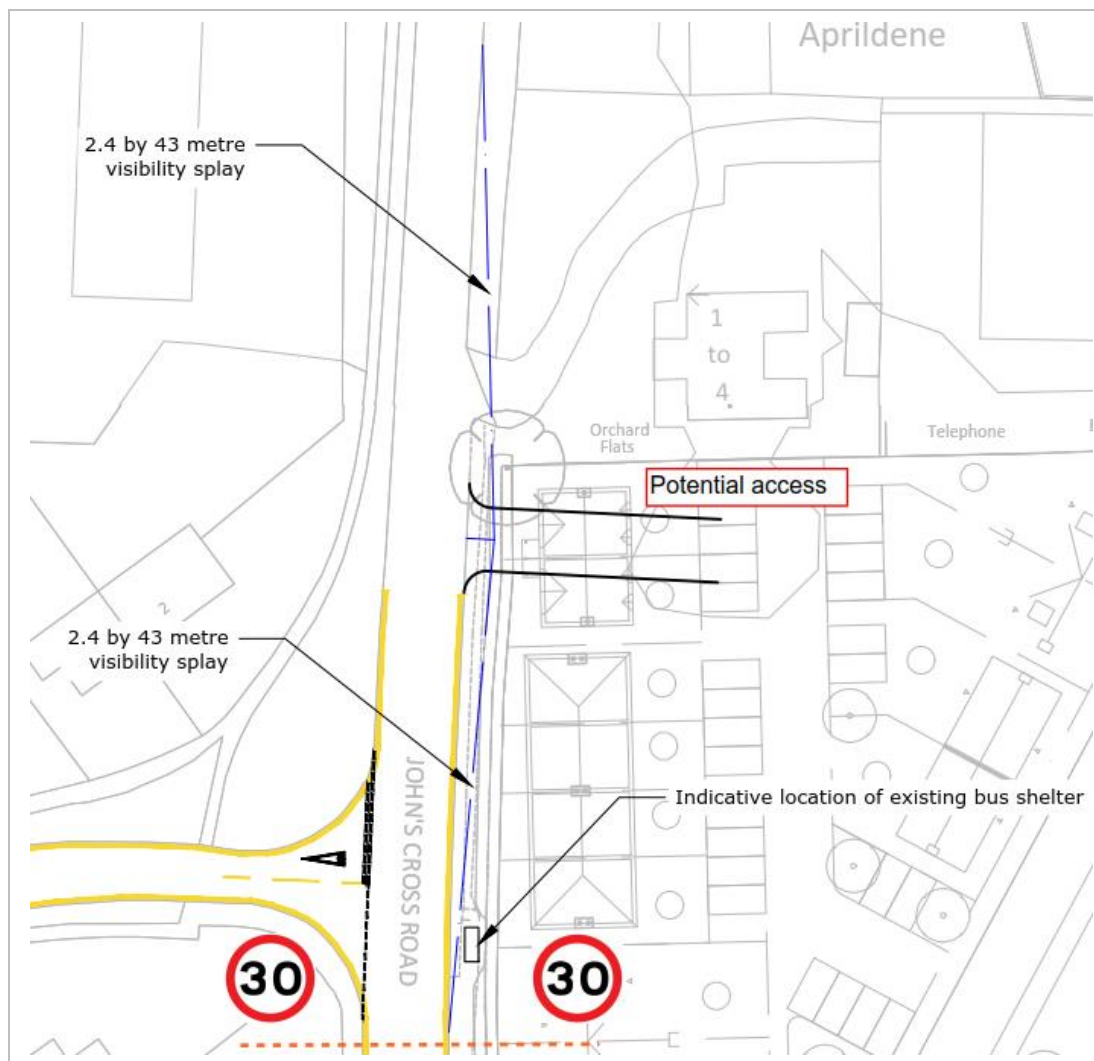


Figure 3.2 – Option 2 access – north of Heathfield Gardens

3.15 The driver visibility splays that can be achieved for Option 2 are:

- ▶ 2.4m x 4.3m splay to the north of the access, based on 30mph speed limit; and
- ▶ 2.4m x 4.3m splay to the north of the access, based on 30mph speed limit.

Review of Option 2

3.16 The Option 2 access location has been reviewed in terms of the likely acceptability of the arrangement. The comments are as follows;

- ▶ The driver visibility splays to the north and south (2.4m x 43m) can be achieved on the basis that the vehicles are approaching at speeds in the order of 30mph. As with the comments provided for Option 1, the recorded traffic speeds along George Hill may be different from the assume speed limit and this will be known once the results from the ATC are obtained;
- ▶ The existing hedgerows will need to be trimmed back and maintained on a regular basis;
- ▶ The existing bus shelter to the south of the proposed junction will be clear of the required driver visibility;
- ▶ There is some flexibility in the extent of the splays should recorded speeds be higher, but there is a limit for the splay to the north due to third party land. If traffic speeds southbound along George Hill are higher

than 30mph, the Option 2 access may need to shift south to accommodate a longer splay. This will not be known until the ATC survey results are available; and

- ▶ The proximity of the access to Orchard Flats to the north will need to be considered as part of emerging design. It is recommended that the new Option 2 access be moved 15-20m south of the Orchard Flats access so that it is mid-way between Orchard Flats and the George Hill/Heathfield Gardens junction. This may impact the developable space within the site.

Summary - Option 2

- 3.17 The delivery of the Option 2 access from George Hill to serve the Phase 2 site will require existing hedgerows to be trimmed and maintained on a regular basis to ensure the driver visibility splays can be achieved. The Option 2 arrangement will need to be reviewed once the ATC survey is available.

Option 3 - Supplementary Access to consider

The Option 2 access presented on the preliminary architect's masterplan layout is immediately south of the Orchard Flats access. The access may be relocated further south to be equi-distant between the Orchard Flats access and Heathfield Gardens to the south – this would provide a more balance arrangement. The Option 3 junction arrangement is presented on Motion drawing 1903076-103 and a full plan is provided in **Appendix D** (with mark-up extract presented in Figure 3.2).

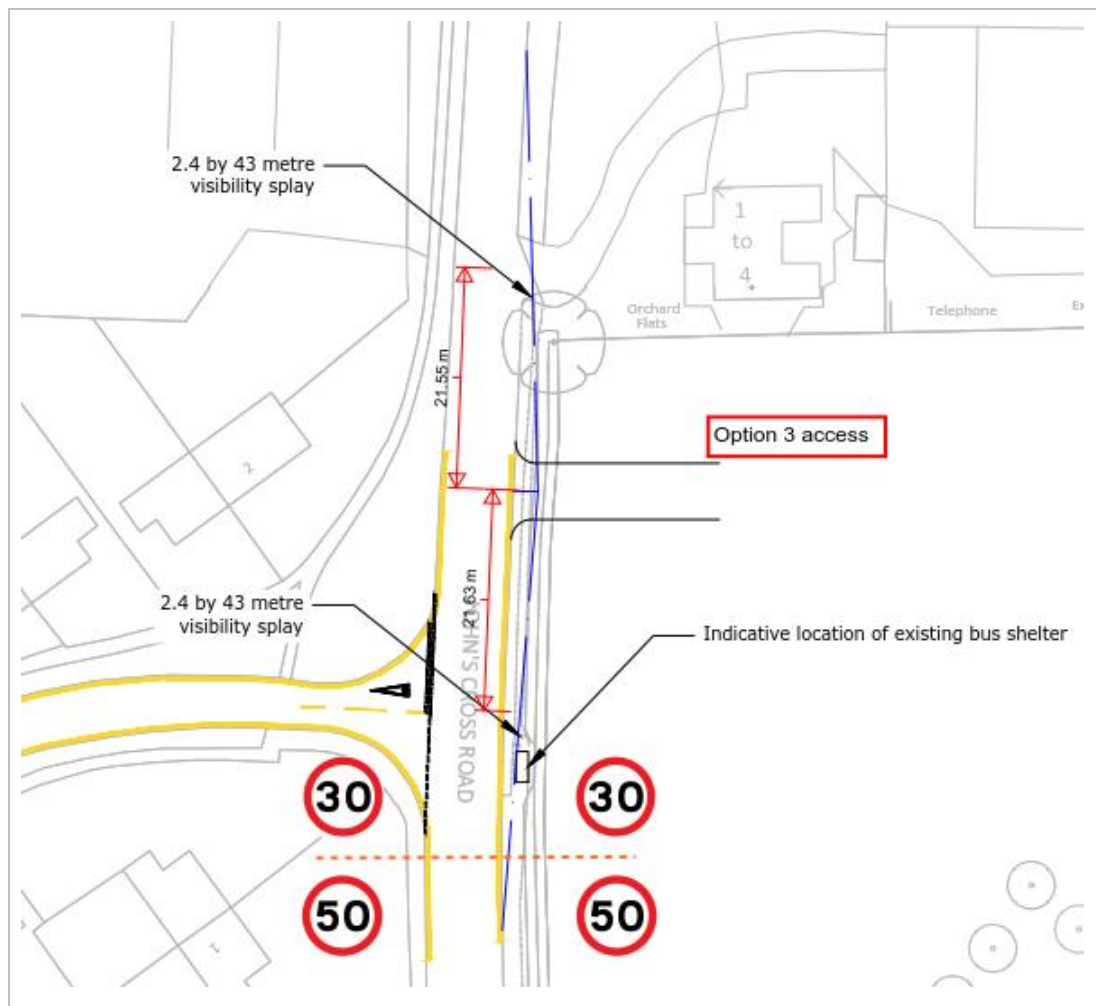


Figure 3.3 – Option 3 access

- 3.18 The driver visibility splays that can be achieved for Option 3 are:
- ▶ 2.4m x 4.3m splay to the north of the access, based on 30mph speed limit; and
 - ▶ 2.4m x 4.3m splay to the north of the access, based on 30mph speed limit.

Review of Option 3

3.19 The centralisation of the proposed access between Orchard Flats and Heathfield Gardens provides a balance between the connections onto George Hill. The required driver visibility splays can be provided.

3.20 The comments are as follows;

- ▶ The driver visibility splays to the north and south (2.4m x 4.3m) can be achieved on the basis that the vehicles are approaching at speeds in the order of 30mph. The splays will need to be confirmed further to the traffic speed surveys;
- ▶ The existing hedgerows will need to be trimmed back and maintained on a regular basis; and
- ▶ The existing bus shelter to the south of the proposed junction will be clear of the required driver visibility.

Summary - Option 3

3.21 The delivery of the Option 3 access from George Hill will provide a better solution in traffic terms but will need to be balanced out with the masterplan layout. The provision of the driver visibility splays in theory be provided within the road space but the existing hedges will need to be trimmed, in accordance with typical maintenance, to ensure the required splays can be delivered.

4.0 Summary and conclusion

- 4.1 The Grove Farm Phase 2 site is identified in the HELAA document (Chapter 5) as 'SAL0022' and identified as a site available for potential development. The site assessment in the HELAA document states the site is allocated and permitted for residential development for an estimated 35 residential dwellings. The Council's Analysis states that an access will need to be provided onto George Hill.
- 4.2 The optimum strategy for the Phase 2 site will be to create a separate access from Phase 1 to allow a second connection onto George Hill which will provide future residents and visitors some flexibility in entering/exit; and the two Grove Farm phases may be constructed separately allowing site clearance and construction traffic to be kept apart from residents and visitors should one of the Phases be completed before the other.
- 4.3 A summary of the proposed access Options review shows that in each case the existing hedge on the eastern side of George Hill will need to be trimmed, in accordance with typical landscaping maintenance, to deliver the splays.
- 4.4 To accommodate the proposed driver visibility splays, Options 1 & 3 will require reduced splays on the basis of the lower speed limits. In summary, Options 1 & 3 are considered the feasible options and Option 2 may be feasible subject to further investigation. We welcome a meeting with ESCC Highways to discuss the site access strategy.

Appendix A

Illustrative Masterplan

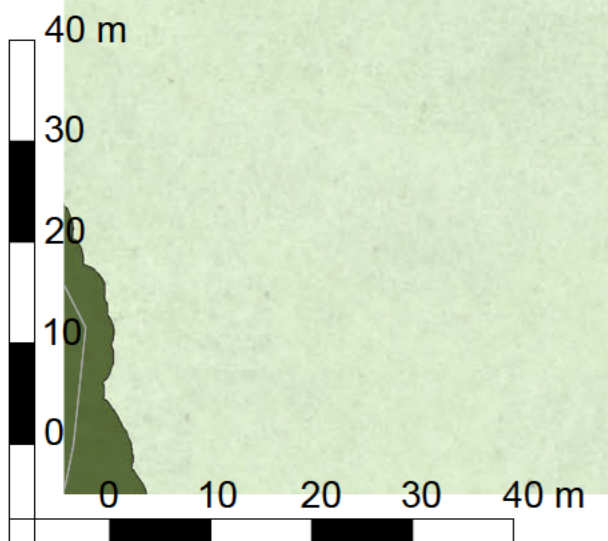


▭ Grove Farm Phase 2
 4.01 hectares
▭ Grove Farm Phase 1
 Site capacity - 61 dwellings

Brooks Murray Architects
 41 Tabernacle Street, London, EC2A 4AA
 +44 (0)2077399655 admin@brooksmurray.com

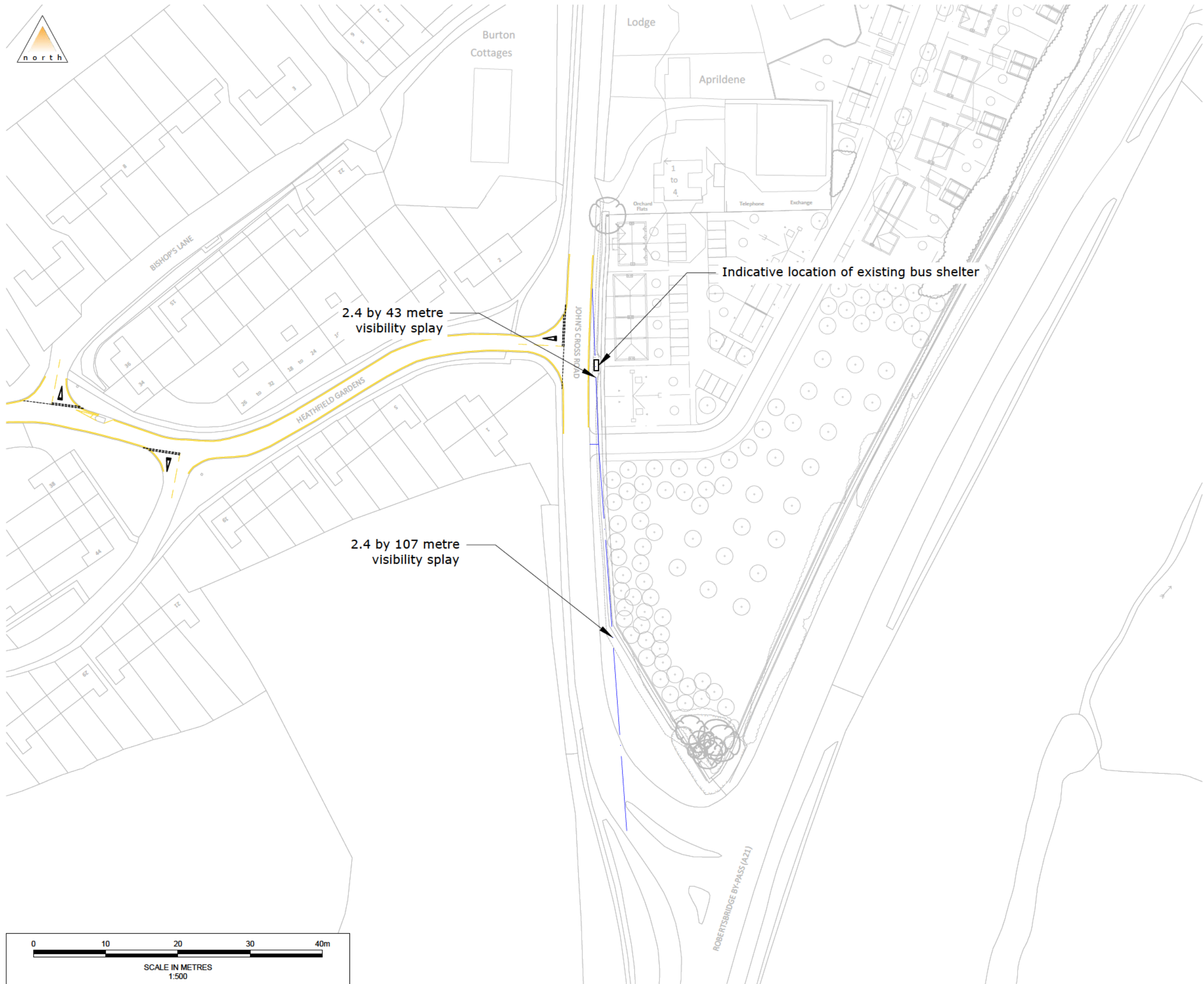


CLIENT:
 The Rector and Scholars of Exeter College
 JOB:
 Land at Grove Farm, George Hill
 Robertsbridge
 TN32 5BY
 DRAWING TITLE:
 Residential development - Phase 2
 Illustrative masterplan
 SCALE:
 1:750 @ A1
 DATE:
 January 2025
 STATUS:
 FEASIBILITY
 DRAWING NUMBER: REV: ISSUED BY:
 1282 -101 FF



Appendix B

Access Option 1 – Motion drawing



Notes

1. All levels and dimensions to be checked on site before any work commences. All dimensions in metres unless stated otherwise.
2. This drawing is based on topographical survey information and Motion cannot guarantee the accuracy of the data provided.
3. This drawing is based on OS mapping and Motion cannot guarantee the accuracy of the data.
4. Location of existing bus shelter determined through interpretation of Google Streetview, Motion cannot guarantee the accuracy of the data.

Legend

Visibility Splay

Rev.	Description	WMC	PdeJ	PdeJ	24/09/2025
-	First Issue				

Drawing Status:

FOR PLANNING
NOT FOR CONSTRUCTION



Guildford - Reading - London
www.motion.co.uk

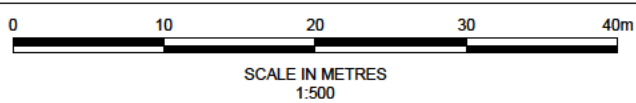
Client:
The Rector and Scholars of Exeter College

Project:
Grove Farm, Robertsbridge

Title:
Proposed Access Arrangeme
Option One

Scale: 1:500 (@ A3)

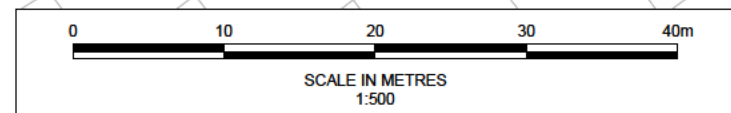
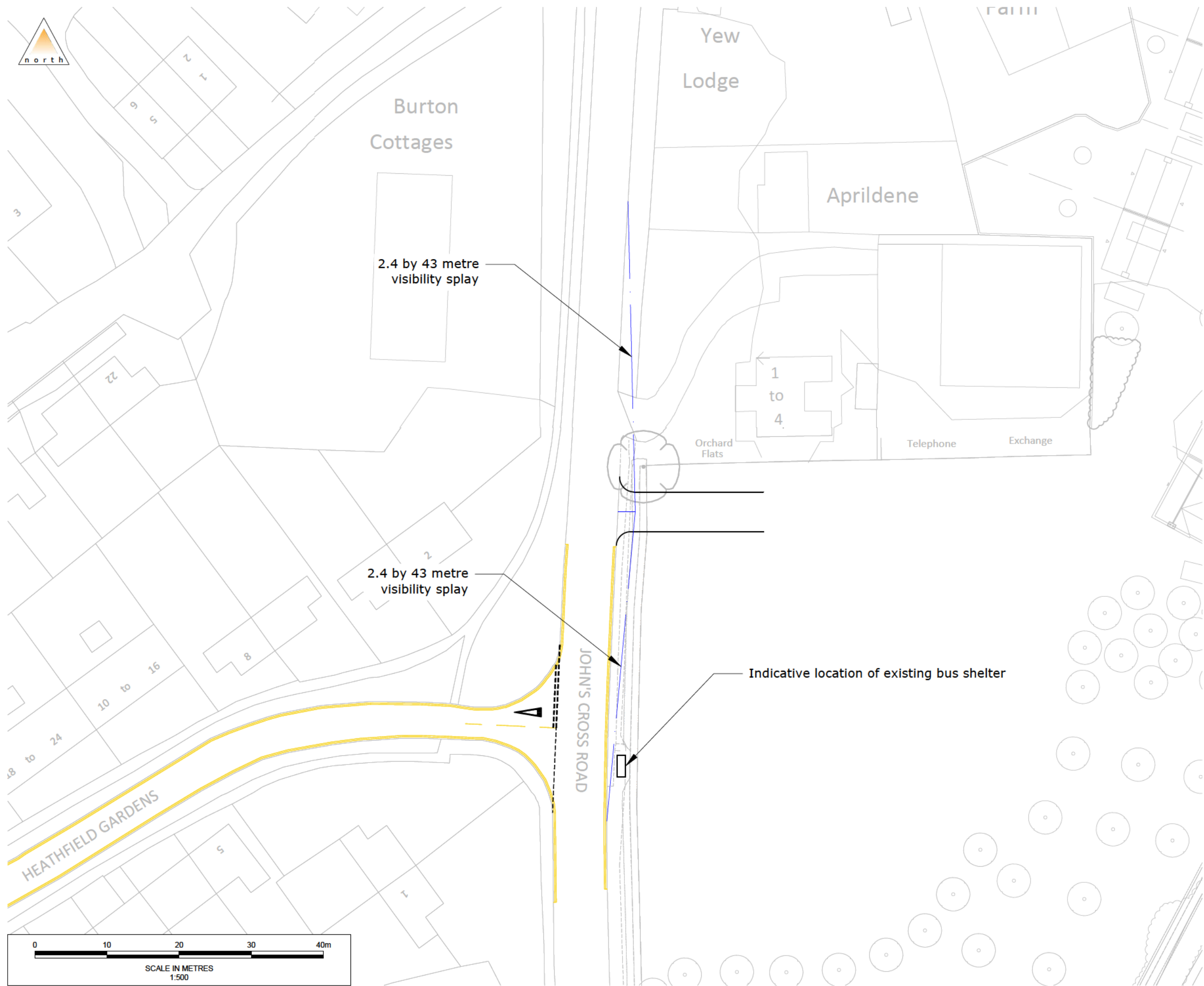
Drawing: 1903076-101 Revision: -



C:\Users\Williamcaney\Motion\StaffSite - Exrob2_1903076\Drawings\1903076-101.dwg

Appendix C

Access Option 2 – Motion drawing



Notes

1. All levels and dimensions to be checked on site before any work commences. All dimensions in metres unless stated otherwise.
2. This drawing is based on topographical survey information and Motion cannot guarantee the accuracy of the data provided.
3. This drawing is based on OS mapping and Motion cannot guarantee the accuracy of the data.
4. Location of existing bus shelter determined through interpretation of Google Streetview, Motion cannot guarantee the accuracy of the data.

Legend

Visibility Splay

Rev.	Description	WMC	PdeJ	PdeJ	24/09/2025
		Drm	Chk	App	Date
-	First Issue				

Drawing Status:

FOR PLANNING
NOT FOR CONSTRUCTION



Client:
The Rector and Scholars of Exeter College

Project:
Grove Farm, Robertsbridge

Title:
Proposed Access Arrangeme
Option Two

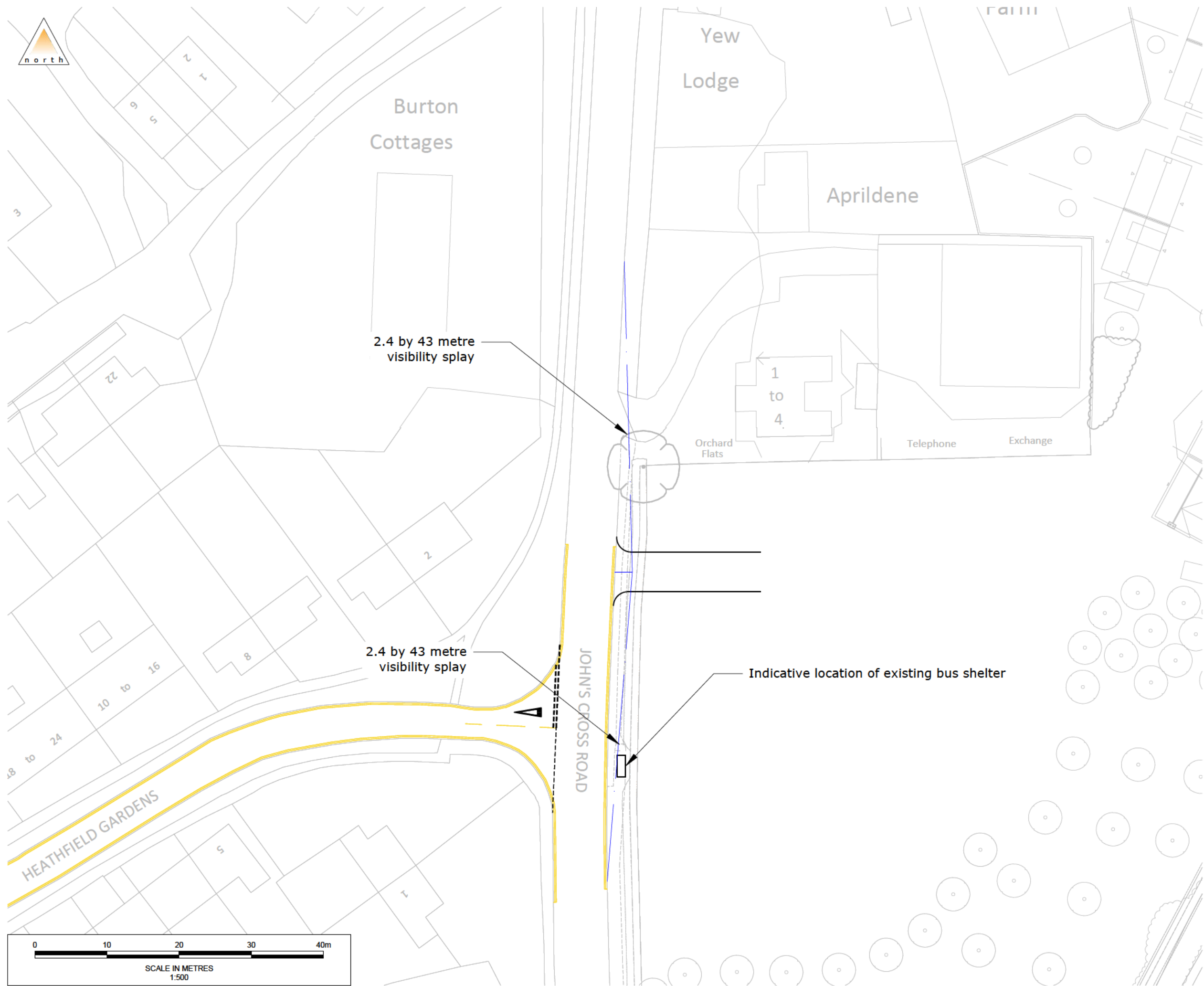
Scale: 1:500 (@ A3)

Drawing: 1903076-102 Revision: -

C:\Users\Williamcaney\Motion\StaffSite - Exrob2_1903076\Drawings\1903076-101.dwg

Appendix D

Access Option 3 - Motion drawing



- Notes**
1. All levels and dimensions to be checked on site before any work commences. All dimensions in metres unless stated otherwise.
 2. This drawing is based on topographical survey information and Motion cannot guarantee the accuracy of the data provided.
 3. This drawing is based on OS mapping and Motion cannot guarantee the accuracy of the data.
 4. Location of existing bus shelter determined through interpretation of Google Streetview, Motion cannot guarantee the accuracy of the data.

Legend

— Visibility Splay

Rev.	Description	WMC	PdeJ	PdeJ	29/09/2025	Date
-	First Issue					

Drawing Status:
FOR PLANNING
 NOT FOR CONSTRUCTION



Client:
 The Rector and Scholars of Exeter College

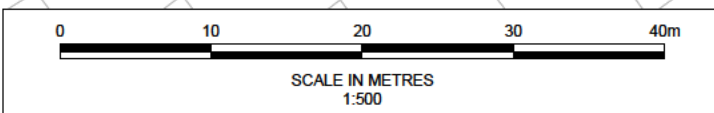
Project:
 Grove Farm, Robertsbridge

Title:
 Proposed Access Arrangeme
 Option Three

Scale: 1:500 (@ A3)

Drawing: 1903076-103
 Revision: -

C:\Users\Williamcaney\Motion\StaffSite - Exrob2_1903076\Drawings\1903076-101.dwg



APPENDIX 4
HIGHWAYS PRE-APP RESPONSE

To: Phil De Jongh

09/12/2025

Our ref: PRE/RR/2025/2228

Location: Land at Grove Farm (Phase 2)
George Hill
Robertsbridge
TN32 5BY

Proposal: The emerging proposal for Phase 2 is to provide up to 70 new dwellings with a mix of houses to reflect the provision of 32 dwellings approved for the Phase 1 scheme. The proposed vehicle access strategy for the Phase 2 development is to create a second access, separate from the approved Phase 1 development.

Applicant: Phil de Jongh

Road Name or Number	C18	Consultation Date	13 October 2025
National Grid Reference	573845 123376	Officer details	Joe McNamara [REDACTED] transportdevelopmentplanning@eastsussex.gov.uk

Thank you for your correspondence, and supporting plan[s], seeking paid pre-application highway advice on the above site and development proposal. A fee for £1920 has been received.

It is noted that the site (phase 1) has permission granted for a total of 32 dwellings under 2 applications. RR/2022/283 for 24 units and RR/2022/1850/P for 8 units covering reserved matters which will be served via an access to the north. It is understood development has not yet commenced. The Grove Farm Phase 2 site is identified in the HELAA document (Chapter 5) as 'SAL0022' and identified as a site available for potential development. However, it is not allocated.

For your proposed development of up to 70 dwellings the main issues to consider and requirements that would need to be met are:

1) Suitable vehicle, pedestrian and cycle access, to include sufficient width, gradient and visibility splays.

Phase 1 of the development benefits from an approved access from George Hill serving 32 dwellings. This access has yet to be constructed at the time of writing and the site is understood to now be under separate land ownership.

The Highway Authority seeks to minimise access points where possible. Each access point represents a potential source of danger due to the turning movements and slowing or stopping traffic associated with them. It would therefore be preferable for the entire development to be served from the single consented access. However, due to separate land ownership, this is unlikely to be achievable

Therefore, three access options have been presented for review to serve the proposed site.

The first access option proposes an access from George Hill, located approximately 28m south of the Heathfield Gardens junction, within the 50mph speed limit.

The second and third access options propose an access to the north of Heathfield Gardens. Option 2 is located further north, approximately 13 m south of the Orchard Flats access. Both accesses are within the 30mph speed limit.

Visibility at the proposed site access will need to be supported by speed survey data. The recorded 85th percentile speeds are 32mph for southbound traffic and 31 mph for northbound traffic. This corresponds to required visibility splays for access options 2 and 3 of 2.4 m X 48 m to the north and 2.4 m X 45 m to the south, in accordance with Manual for Streets. For option 1, visibility splays of 2.4 m X 73 m to the north and 2.4 m X 69 m to the south are required in accordance with the Design Manual for Roads and Bridges.

While the speed survey does not meet all criteria set out in CA185, it is considered to provide an accurate representation of speeds along this stretch of the C18.

Following review of the highway terrier and a site visit, visibility splays are considered achievable to a 1 m offset from the nearside carriageway edge for options 2 and 3, subject to the trimming back of vegetation. It is noted, however, that the splays are shown to the centre of the carriageway on the submitted plan, rather than the nearside carriageway edge, as is required. The boundary hedge will require partial removal and lowering, and if retained, must be maintained at a height no greater than 600 mm to facilitate the access.

Regarding option 1, the splay to the south is considered achievable. However, the splay to the north goes directly through the bus stop. As discussed in more detail later in this report, this bus stop is used as a 'timing point'. As a result, buses may wait at these stops for extended periods if they arrive early which would obstruct the visibility splay.

Of the three access options presented, option 2 is considered the most favourable in principle. This is because the access would be located within the 30mph speed limit, compared with the 50mph limit applicable to option 1, and therefore vehicle speeds are likely to be lower and the characteristics of this stretch of road are more aligned with MfS requirements rather than Design Manual for Roads and Bridges. Furthermore, for Option 1, the proximity of

Heathfield Gardens, the proposed site access, and the access associated with the live application at the time of writing (reference RR/2025/1438) to the south could result in conflict due to their relatively close spacing. When considered alongside the position of the bus stop, the Highway Authority has concerns with access option 1.

Option 3, whilst also within the 30mph speed limit, is located closer to the Heathfield Gardens junction than Option 2, and this would also be a concern.

Notwithstanding the above, any proposed access will be subject to a Stage 1 Road Safety Audit. Ideally, this should be provided at the pre-application stage where an informed highway response is required. As noted in more detail later in this report, application RR/2025/1438 may progress recommendations to relocate the existing bus stop opposite Heathfield Gardens. This could render access options 2 and 3 unfeasible.

Tracking drawings for a 12 m long refuse vehicle will be required at the site access and internally, demonstrating that the vehicle can conveniently manoeuvre within the site and exit in a forward gear.

Construction of the access shall be carried out in accordance with ESCC specifications, with all works undertaken by an approved contractor under the appropriate legal agreement. In this instance, this is likely to be under Section 278 of the Highways Act 1980.

2) Appropriate on- site vehicle and cycle parking- the number of spaces should be in accordance with ESCC standards

Parking should be in accordance with the East Sussex Parking Calculator 2024. The applicant should apply this once the number and size of dwellings is known.

Tandem parking is an inconvenience to residents and estate road users and leads to poor parking habits such as parking across crossovers whilst obstructing footways, or parking close to junctions. This should therefore be kept to a minimum in any forthcoming submission to prevent obstruction of carriageways for emergency and service vehicles; and maintaining clear footways for pedestrians and wheelchair users.

The minimum sizes are as follows:

Parking Space - 5m x 2.5m; a minimum additional 0.5m will need to be added to either or both dimensions where the space is adjacent to hard feature such as wall or fence.

Spaces in front of garages must be a minimum of 6m long and 3.5m wide to maintain access to the garage on foot or by cycle.

Spaces arranged parallel to the road- 2.5m X 6m. These should be tapered to allow for easier entry/egress.

A footway should also be provided behind the parallel parking spaces (minimum 0.5m wide) for vehicle users to alight onto a hard surface.

Accessible Parking Space - 5m x 3.6m

Car Ports - 5m x 2.8m but cannot have front enclosures.

Garages - 3m x 6m or 3m x 7m if cycle storage is included.

Regardless of size, garages remain less likely to be used for parking and therefore a garage only counts as 1/3 of a parking space.

A 6m manoeuvring space is generally required behind all parking spaces to enable vehicles to manoeuvre in and out of position in a safely

Electric Vehicle charging facilities for vehicles at all properties with off-street parking is required in accordance with current guidance as set out in the NPPF and Building Regulations. These should be provided per plot and can be within garages or driveways.

Cycle Parking

Accessible, secure and covered cycle parking facilities need to be provided at new developments and are equally important as car parking because cycling has the potential to replace shorter car journeys. The level of cycle parking will need to meet the requirements of the East Sussex County Council standards of 1 cycle space per bedroom. Cycle parking must be as accessible as vehicle parking. Residents should not have to squeeze past parked vehicles to access their cycle parking. Vehicle parking spaces/driveways need to be wide enough for paths to be provided alongside to reach cycle parking in garages or separate stores. Ideally secure stores should be conveniently accessible, as well as securely located. Cycle storage areas should be separate from and not be obstructed by bin stores.

3) Appropriate on site vehicle turning for vehicles likely to visit the site

Tracking drawings are required demonstrating a 12m refuse vehicle can manoeuvre within the site conveniently to egress in a forward gear. In accordance with ESCC guidance 'refuse & recycling storage at new residential developments within the Eastbourne, Hastings, Wealden and Rother council areas' residents should not be required to carry waste more than 30m and refuse vehicles should be able to reach within 25m of the storage point for collection.

4) The likely trip generation of the existing and proposed development

No trip rate analysis has been submitted for review as part of the scoping note.

Trip rate distribution and assignment trips, based on census data, will need to be provided and agreed with the Highway Authority in order to determine any potential junction capacity analysis required to assess the impacts arising from the development. As this proposal relates to Phase 2, and the site as a whole would comprise in excess of 100 dwellings, the development should be assessed comprehensively as a single scheme to ensure robustness. It is noted from discussions with the applicant the live application, RR/2025/1438 for 42 dwellings will also be included in the modelling.

National Highways would be likely to request an assessment of their junction to the south, particularly in light of other developments in the area coming forward.

5) Appropriate improvements to the local network to ensure safe access, and accessibility by all modes of transport.

The site is generally well served by public transport. Robertsbridge Station is located approximately 850 m to the north-west and is accessible via footways. Local amenities, including a doctor's surgery, primary school, public house, and bakery, are located to the north and are also accessible by footway.

Existing bus stops are located within 400 m of the development, namely the 'Heathfield Gardens' stops on George Hill. The principal service is Route 1066, which links Robertsbridge with Battle, Hastings, Hurst Green, Hawkhurst, Ticehurst, and Tunbridge Wells. Route 1066 operates hourly during the daytime from Monday to Saturday, with some additional journeys extending into the evening. On Sundays, the service also operates hourly. The service is wholly reliant on funding from East Sussex County Council. The evening and Sunday services were introduced in July 2023 and are funded by the UK Government as part of the Council's Bus Service Improvement Plan (BSIP). This Government funding is due to expire in April 2026.

The Heathfield Gardens bus stops are used operationally by the bus operator as timing points. As a result, buses may wait at these stops for extended periods if they arrive early, in order to avoid running ahead of schedule. The existing bus stop infrastructure and locations would benefit from improvement.

The southbound bus stop (towards Battle and Hastings) is located directly opposite the Heathfield Gardens junction, which is considered suboptimal. The East Sussex Passenger Transport Team has recommended relocating this stop further north and providing a half-depth bus lay-by. The provision of a half-depth lay-by for the northbound stop would also assist in maintaining traffic flow and could help alleviate safety concerns when both stops are in use. These improvements have been suggested in connection with the Heathfield Gardens application to the south for 42 dwellings (reference RR/2025/1438), which is live at the time of writing. Should the applicant pursue these works, this may preclude access options 2 and 3 for the current site.

Notwithstanding the above, the Heathfield Gardens junction has operated safely for over 10 years, indicating that the existing arrangement is broadly acceptable. The Highway Authority would therefore work with the applicant to identify and agree a suitable alternative bus stop location that delivers a safety benefit.

A shelter is currently provided at the southbound stop; however, it does not appear to meet current accessibility requirements (for example, sufficient space for wheelchair users). Both bus stops will require provision of suitable shelters with seating and lighting (subject to Parish Council agreement and a long-term maintenance commitment), hardstanding, raised kerbs, bus stop clearway markings, and real-time passenger information displays.

A bus service contribution of £1,430 per dwelling is required to support the continued operation of Route 1066.

A Travel Plan Statement, as a minimum, should also be submitted to encourage sustainable travel choices and would be secured by condition.

The link below will also direct you to the basic information needed to assist in the highway and transport consideration of many proposals.

Our Local Design Guide and other ESCC guidance documents relating to highway construction can also be found here:-

ESCC will expect the following to be submitted as part of any future application:

- A site location plan scale (1:1250) with site boundary indicated
- Schedule of existing uses including planning history
- Description, including site layout plans, of the proposed development/uses
- Reference to supporting national, regional, and local planning documents and policies
- Summary to support the site access/highways works proposals, including plan (scale 1:250 or similar) with achievable visibility splays, access widths and gradients indicated
- Stage 1 Road Safety Audit of proposed highway works and designers response, including amended plans
- A 'Transport Report/Statement', including location of key services, availability of sustainable modes of transport and existing/future vehicular traffic generation
- Parking strategy, including provision of parking for all modes of transport
- Relevant data collected to date
- Proposed trip rates supported with TRICS outputs and site selection methodology

Please note any advice is provided on the understanding that, if a highways scheme is subsequently delivered by the Developer via the Section 278 or Section 38 Agreements process, the Developer agrees to undertake all the obligations of a "client" for the purposes of the CDM Regulations (SI 2015/51). A copy of the obligations the Developer will be required to adhere to through any Section 278 or Section 38 Agreement is available on request. It is recommended that Developers discuss these obligations with their solicitors if they are unsure as to the CDM requirements.

The above comments are for guidance only and shall not prejudice any further comments East Sussex County Council wishes to make at any next stage, recognising that policy and material considerations can change. They should however be regarded as highway requirements that would need to be satisfactorily met as part of any formal proposal. The final decision to grant planning permission is made by elected members of the local planning authority.

On behalf of the Highway Authority
For Director of Communities, Economy & Transport