



Almonry Farm, Battle

Rother Local Plan

Development Strategy and Site Allocations

Draft (Regulation 18) Version

**Andrew Black Consulting on behalf of Wates
Developments**

March 2026



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1. Introduction

- 1.1 These representations have been prepared by Andrew Black Consulting on behalf of Wates Developments Limited in response to the Rother Local Plan, Development Strategy and Site Allocations Draft (Regulation 18) Version Draft Preferred Policy Options Paper.
- 1.2 Wates Developments has an interest in the site at Almonry Farm, Battle which is identified for allocation within the local plan. The site and surroundings are described within these representations and technical studies have been undertaken which are referred to throughout these representations and also appended with this document.
- 1.3 These representations are made in the context of the tests of soundness as set out in paragraph 36 of the current National Planning Policy Framework (NPPF). This states that plans are 'sound' if they are:

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 and other statements of national planning policy, where relevant.

- 1.4 The allocation of the northern fields at Almonry Farm in Battle under policy BT7 within the draft plan is welcomed, however it is considered that a larger area of the site is suitable for development than the restricted area shown in the plan.
- 1.5 As proposed, the plan would represent a significant shortfall in housing delivery against the established housing target under the government standard method. This should be viewed in the context of the historic undersupply of housing in the district and the chronic lack of five year housing land supply under the present plan. This has resulted in a significant shortfall in overall housing but more critically a lack of affordable housing delivery against well-established needs.
- 1.6 The constraints of Battle and the wider district in so far as national landscape and heritage are all acknowledged but it is considered that development of additional housing at Almonry Farm, and indeed through other sites, must be considered if the plan is to be found sound.

2. Site and Surroundings

- 2.1 The entirety of the site which Wates has an interest in is shown below and extends to approximately 18.5 hectares.



Figure 1 – Site Location

- 2.2 The site consists of agricultural grazing land and is currently accessed from North Trade road. The site is surrounded by existing residential development to the north and west and existing countryside/woodland (which includes ancient woodland) to the east and south.
- 2.3 The site is within the High Weald National Landscape, as is the entire settlement of Battle and some 83% of the entire area of Rother District Council.
- 2.4 There are no designated heritage sites within the boundary of the site. Battle Conservation Area is situated to the west of the site (but does not directly adjoin the boundary of the site). Lower Almonry Farmhouse is a grade II listed building which is situated immediately to the west of the site.
- 2.5 The site is not within an area at risk of fluvial flood risk. There are some isolated areas of surface water flooding on the site and on the boundaries around existing drainage ditches.
- 2.6 The site does not have any planning history.
- 2.7 The Site is assessed in the latest version of the Housing and Economic Land Availability Assessment (HELAA) as two separate references / land parcels. The northern element

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(covered by the allocation BT7) is assessed under reference BAT0127. The southern element (not included in the area for allocation BT7) is assessed under reference BAT0014.

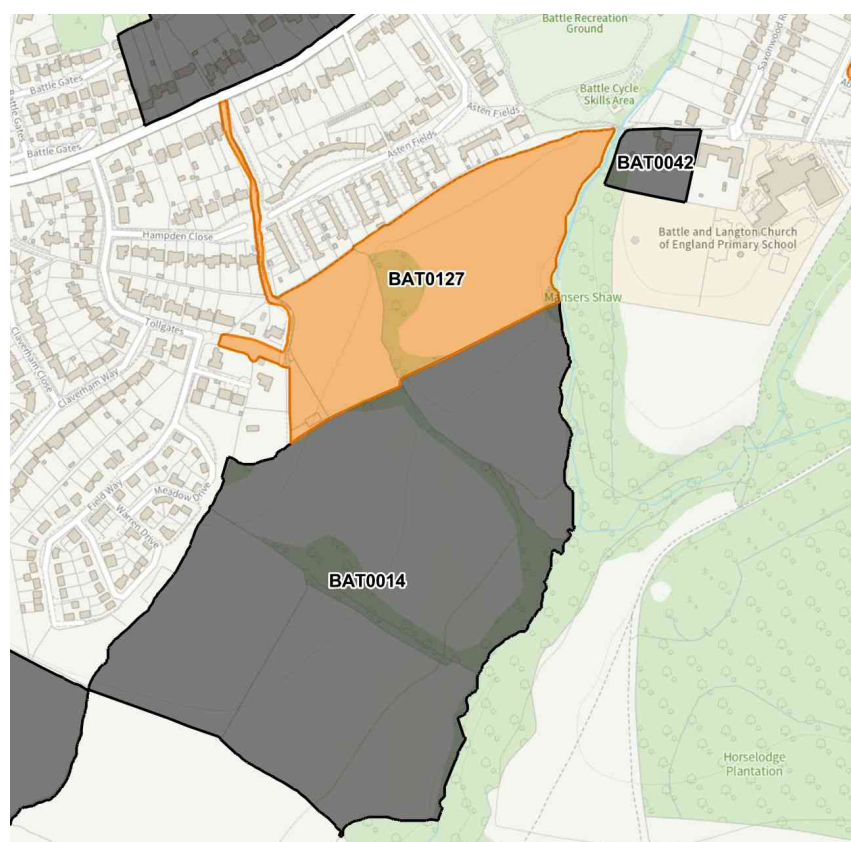


Figure 2 – HELAA Extract

2.8 The HELAA sets out the following identical description for both sites:

The site is within the High Weald National Landscape. Adjacent to Ancient Woodland and Deciduous Woodland Priority Habitat. Protected trees on the boundary of the site. Part of the site are within Flood Zones 2 and 3 and at risk of surface water flooding. Nearby to a Groundwater Source Protection Zone. Historic field boundaries across the site. Battle of Hastings 1066 Registered Battlefield, Battle Abbey Registered Park and Garden and Battle Conservation Area are a short distance to the east. A public runs along the north boundary.

2.9 The description of the sites is accurate. The technical and policy constraints are addressed in other sections of these representations.

2.10 The HELAA sets out the following comments in respect of the northern site (BAT0127):

The site comprises two fields located adjacent to existing development to the southern side of Battle. The site offers a potential opportunity for residential-led growth, however, there are environmental and heritage constraints that would require careful consideration including its location within the High Weald National Landscape, an AONB, its proximity to heritage assets including the Battle Conservation Area and Registered Battlefield and a Listed Building, areas at risk of surface water flooding in its northern section and on its boundaries, an area of ancient



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woodland adjacent to its entire eastern boundary, intact historic field boundaries within the site defined by mature trees and hedges, a pond, and access via an existing residential area. An adjoining field to the west has recently been developed with a residential scheme of 63 dwellings, being relatively contained within the landscape and well related to the existing built-up area of Battle. Linkages to existing public footpaths and to local services could be achieved. Initial Highway Authority comments suggest that a vehicular access via Tollgates appears achievable, although further assessments of junction capacity on North Trade Road and the A2100 roundabout would be required.

2.11 The comments in relation to the technical constraints and requirements are addressed within other sections of these representations.

2.12 The HELAA sets out the following comments in respect of the southern site (BAT0014):

This is a large site comprising a network of historic fields, located on the southern side of Battle. It has a number of constraints including its location within the High Weald National Landscape, an AONB, its proximity to heritage assets including the Battle Conservation Area and Registered Battlefield and a Listed Building, areas at risk of surface water flooding in its northern section and on its boundaries, an area of ancient woodland adjacent to its entire eastern boundary, intact historic field boundaries within the site defined by mature trees and hedges, a pond, and access via an existing residential area. The landscape character of the site increases in sensitivity, becoming more rural, tranquil and exposed in the southern areas of the site. As such development here at the level identified within the HELAA would be considered to cause harm to the landscape and character of the National Landscape.

2.13 The constraints and additional sensitivity of the southern parcels are acknowledged but for the reasons set out within these representations it is considered that the entire site is suitable for allocation under policy B7. The illustrative layout and further technical information submitted demonstrates that the site can be developed without harming the sensitive constraints identified.

2.14 The Settlement of Battle is classed within the second tier of settlement sustainability in the local plan alongside Rye and the fringes of Bexhill.

2.15 The Settlement Study – Part 1, published in April 2024 shows that Battle ranks highly in terms of overall settlement score and is only marginally lower than the central area of Bexhill at the very top of the hierarchy.

	Settlement	Parish/Area	Essential Services (5)	Service Level (5)	Public Transport (5)	Employment Opportunities (5)	Internet Broadband (3)	Total Score (23)	Estimated Population
Highly Sustainable	Bexhill	Bexhill	5	5	5	5	2	22	49,715
	Central (Bexhill)	Bexhill	5	4	5	4	2	20	14,906
Sustainable	Rye	Rye	4	4	4	4	2	18	5,443
	Battle	Battle	4	3	4	4	2	17	6,447
	Sidley (Bexhill)	Bexhill	4	3	4	3	2	16	10,313
	Little Common (Bexhill)	Bexhill	4	3	4	2	2	15	7,302

2.16 The site itself is in a highly sustainable location. It is within reasonable walking distance to Battle and Langton Church of England Primary School; Claversham Community College Secondary School; and Battle Abbey Independent School.

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- 2.17 The site is within reasonable walking distance of Battle High Street which provides a range of shops and services including GP surgeries, pharmacies and dentists.

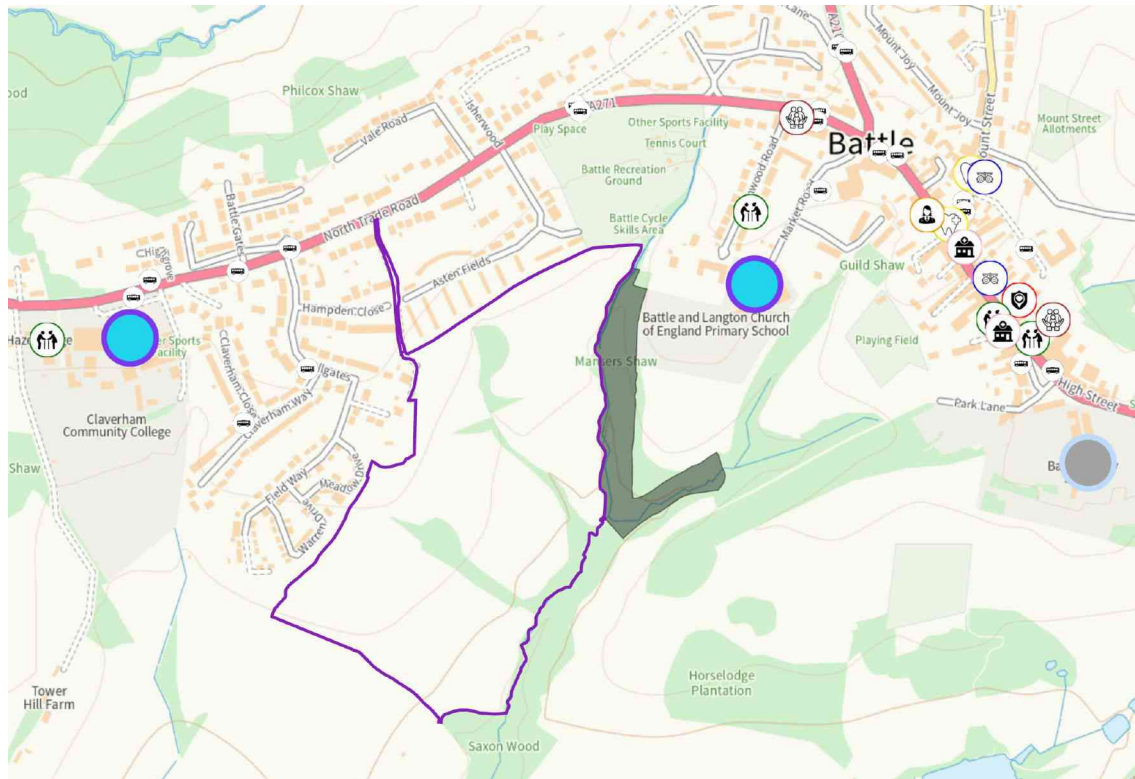


Figure 3 – Site Sustainability

- 2.18 Overall, it is considered that the site is in a highly sustainable location and that Battle is highly suitable for a strong level of housing growth within the emerging local plan.

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3. Draft Allocation – BT7

- 3.1 As set out, the site is centrally located with Battle and the site forms one of several proposed allocations in the draft plan.

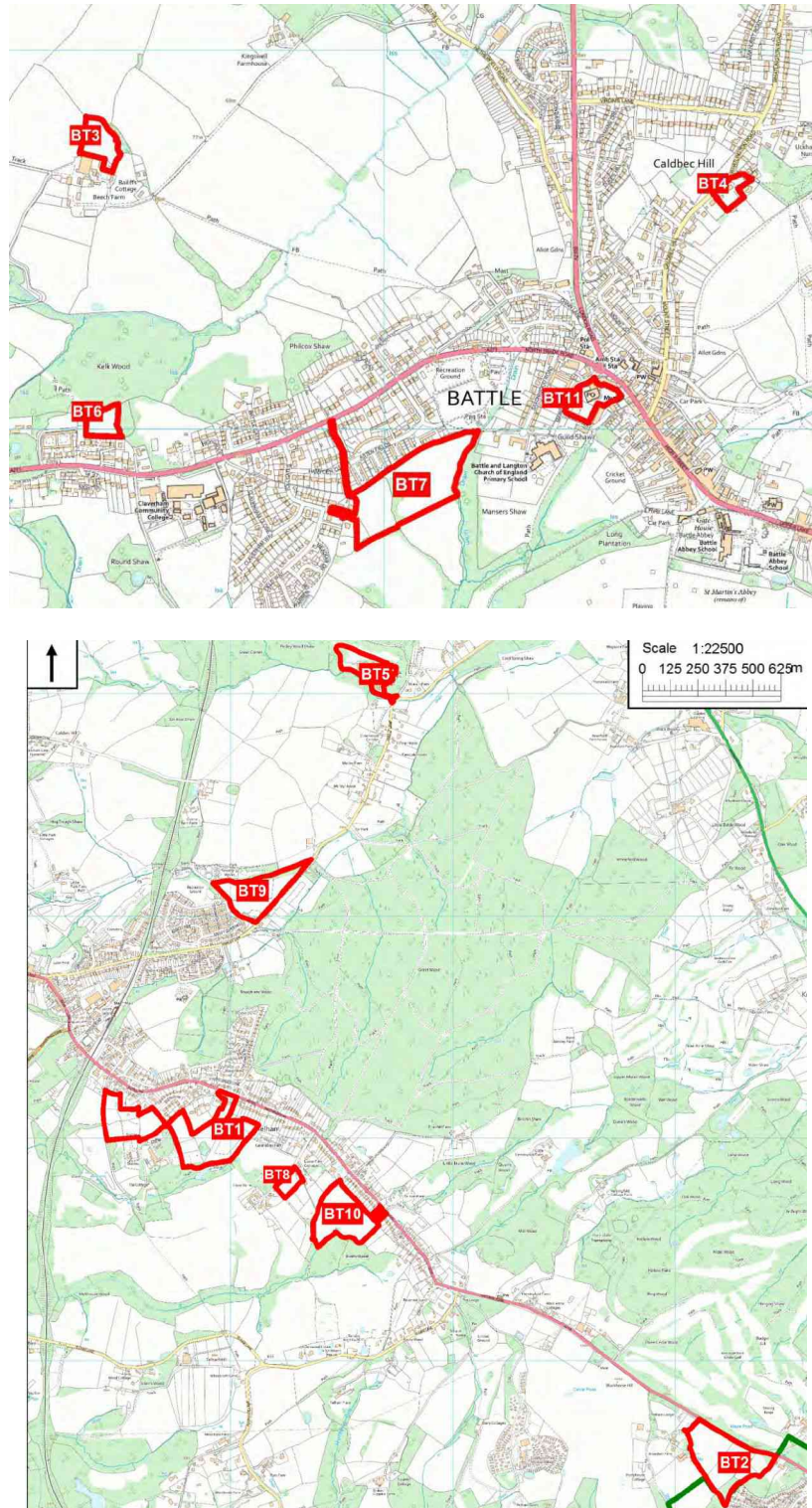


Figure 4 – Proposed Allocations



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- 3.2 The draft local plan proposes the allocation of the northern part of the site for 80 dwellings on an area of 2.4 hectares at an indicative residential density of 35 dwellings per hectare.
- 3.3 The intention to allocate part of the site for development is supported and is considered to be deliverable, achievable and suitable, taking into account the opportunities and constraints of the site.
- 3.4 Turning to the policy text itself, this sets out a number of requirements for development of the site. These are set out below with comments made against each criterion in turn:
- i) Provide a policy-compliant amount of on-site affordable housing in line with policy HOU2 of the Rother Local Plan*
- 3.5 The minimum percentage required under policy HOU2 is yet to be confirmed and the explanatory text of the plan states that this will be completed following the regulation 18 consultation. The site is capable of providing a policy compliant amount of affordable housing which will include a mix of dwelling types and tenures.
- 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 and the protection of the setting of heritage assets.*
- iii) Include a new vehicular access from Tollgates.*
- 3.6 The indicative layout provided with these representations shows the vehicular access from Tollgates.
- iv) Include pedestrian and cycle links to Tollgates.*
- 3.7 The indicative layout provided with these representations shows pedestrian and cycle links to Tollgates.
- v) Include pedestrian links to the public right of way that runs adjacent to the northern boundary of the site.*
- 3.8 The indicative masterplan can incorporate links to the existing PRoW.
- vi) Include an area of public open space (and no built development) across the western part of the site in line with the ratios indicated above, in order to protect the setting of the adjacent listed building and views from the Battle Abbey Gatehouse Scheduled Monument.*
- 3.9 The concept masterplan includes public open space.
- 3.10 A Heritage Technical Note has been provided by Orion Consultants and is included with these representations at appendix 2. This sets out detailed consideration to the setting of the adjacent listed building and also views from Battle Abbey Gatehouse.



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- vii) 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 eastern boundary, between the edge of development and the ancient woodland.**
- 3.11 The indicative masterplan incorporates a buffer around the edge of the development to the ancient woodland.
- viii) Retain the existing historic field boundaries comprised of hedgerows and trees throughout the site where possible, ensuring impacts from necessary access points are minimised as far as possible.**
- 3.12 The proposed masterplan shows that the historic field pattern, consisting of hedgerows and trees, can be retained as part of any proposed development of the site.
- ix) Retain, and where appropriate enhance, the historic field boundary comprised of hedgerows and trees to the southern boundary of the site.**
- 3.13 This requirement could be absorbed into the previous criterion as part of further modifications to the policy. Nevertheless, the proposed masterplan shows that the historic field pattern, to the southern boundary of the site, consisting of hedgerows and trees can be retained as part of any proposed development of the site.
- x) Protect the setting of the Grade II listed building (Lower Almonry Farmhouse) adjacent to the access of the site, including through the design of the access point.**
- 3.14 The Heritage Technical Note concludes that, whilst development of the site will lead to a loss of part of the Lower Almonry Farmhouse (Grade II) historic farm holding, the visual effect of the proposed housing area is limited, and any effect would cause less than substantial harm.
- xi) Include an assessment and evaluation of the site's archaeological potential and the implementation of any mitigation measures identified through the assessment.**
- 3.15 An Historic Environment Desk Based Assessment (HEDBA) has been undertaken which has reviewed the East Sussex HER records and Historic Landscape Characterisation data within a 1km radius of the site. This assessment has established that that the site has a low potential to contain finds and features from all periods. Given the proximity of the study site to the registered battlefield, there is potential for the study site to contain finds relating to the Battle of Hastings (1066). The study site also has a known potential to contain medieval and post medieval agricultural features of local significance.
- 3.16 A future planning application will be supported by an updated HEDBA and a geophysical survey. The need and timing of any further archaeological works will depend on the results of the geophysical survey, the details of which can be agreed with the council at a later date.
- xii) Include any necessary off-site highway works necessary to make the development acceptable.**



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- 3.17 This is a matter which can be resolved during the preparation of a detailed application.
- 3.18 The supporting text of policy BT7 sets out commentary on the site. This is set out below with submissions made against relevant sections in turn:

The site comprises two fields to the south of existing built development at Battle. It lies within a network of similar historic fields and is considered suitable for medium-scale residential development. The site is located within the High Weald National Landscape and contains High Weald features including well-wooded historic field boundaries defined by mature trees and hedging, and therefore a sensitive form of development is required in line with Local Plan policies.

- 3.19 This is considered an accurate description of the site. It is clear that the council considers that sensitive development of the site can take place without a high level of harm being caused to the High Weald National Landscape.

Environmental constraints relating to the site include Ancient Woodland and Deciduous Woodland Priority Habitat located adjacent to the eastern boundary of the site, with parts of the site being at risk from surface water flooding, with the policy requirements detailed above to mitigate impacts. Given its location, the site has potential to be of high value for biodiversity including protected species, and appropriate measures to achieve Biodiversity Net Gain will be required. A full tree survey would be required to inform the development with a view to retaining all existing hedges and mature trees where possible and enhancing them with appropriate supplementary planting.

- 3.20 The constraints in relation to ancient woodland, deciduous woodland and surface water flooding are acknowledged and fully understood.

- 3.21 Initial advice has been obtained from an arboricultural consultant to ensure that existing hedges and trees can be retained on the site.

Heritage constraints relating to the site include its proximity to heritage assets including the Registered Battlefield where the 1066 Battle of Hastings was fought, a Grade II listed building and Battle Conservation Area, with the policy requirements detailed above set out to protect and limit impacts on these assets. A heritage impact assessment and archaeological assessment will be required to inform the design of the development, including the vehicular access, to ensure heritage assets, including the setting of the adjoining Grade II listed building are protected.

- 3.22 As set out, the initial heritage advice as appended to these representations demonstrates that the impact on the surrounding heritage assets is limited and can be mitigated by sensitive design of the site.

The site is well located in relation to amenities and services in Battle if pedestrian and cycle links are provided as detailed above. Initial indications suggest that a vehicular access via Tollgates appears achievable, although further assessments of junction capacity on North



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Trade Road and the A2100 roundabout will be required to inform any necessary mitigations or improvements to the local highway network.

- 3.23 It is agreed that the site is in a sustainable location and that access for vehicles, pedestrian and cycles is achievable from Tollgates. Further mitigation and improvement to the local highways network can be scoped as part of pre-application discussions prior to submission.

Conclusions in respect of proposed allocation

- 3.24 The allocation of the northern parcel of the land controlled by Wates is very much welcomed. It is clear that the requirements of the allocation can be met and the development of the site would directly align with the strategy for Rother as outlined in the draft plan.

4. The Case for Additional Land to be allocated under policy BT7

- 4.1 As set out, the area allocated under policy BT7 only relates to the northern area of the land which Wates Developments has an interest in. The entire land area includes both BAT0127 (as allocated in policy BT7) and area BAT0014 in the HELAA.

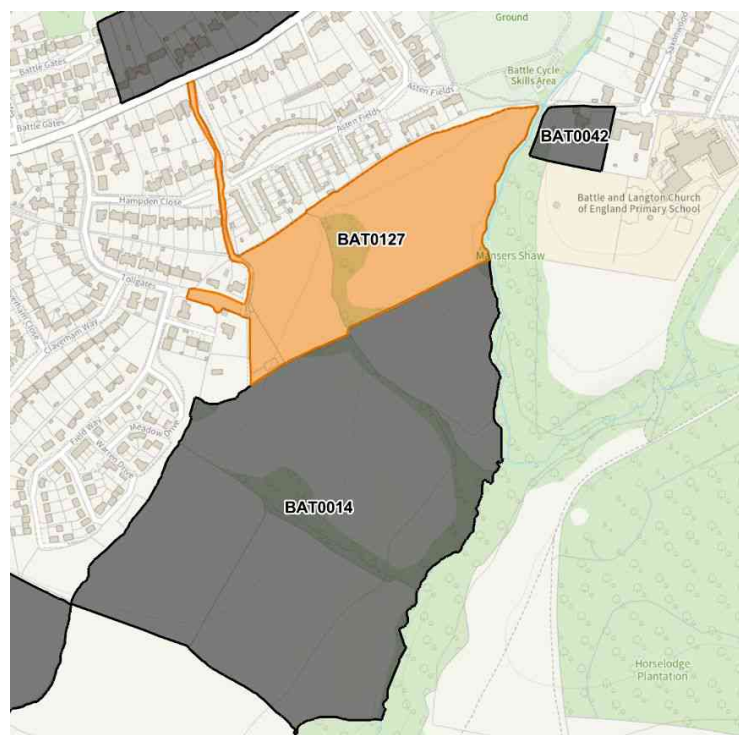


Figure 5 – Extent of entire land interest

- 4.2 The southern portion of the site (under reference BAT0014) is considered to represent a deliverable, available and achievable site which could provide much needed additional dwellings in the early part of the plan period.
- 4.3 The viability of the site to deliver affordable housing would be greatly increased and improved as a result of an expanded area and quantum of housing which could be achieved through modification to policy BT7 to revert to a larger area for site allocation and increased number of dwellings.

Provision of Housing

- 4.4 Previous engagement between Wates and Rother Council during 2025 indicated that the capacity of the wider site is in the region of 175 dwellings. An increase in the dwelling numbers on site would give rise to a much greater range of dwelling sizes and typologies in accordance with the requirements of the district.
- 4.5 Importantly, such a development would lead to a significant increase in the number of affordable dwellings which would help address the significant and pressing shortfall as identified in other sections of these representations.



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Landscape Considerations

- 4.6 As established, 83% of the district is located within the High Weald National Landscape and the whole of Battle is washed over by this designation. The Levelling Up and Regeneration Act 2023 (LURA) introduced a 'landscape duty' for local councils to actively seek to further the statutory purposes of these landscapes at plan making and decision taking stages of development. It is clear that the council has accepted that in general terms, allocations for development within the National Landscape will be necessary in order to address the significant housing need in the district. The Sustainability Appraisal establishes that no reasonable alternative exist which would achieve the same level of housing growth by developing outside of the National Landscape.
- 4.7 At a site specific level, the council has accepted that development of the northern part of the wider site, as proposed under policy BT7, can take place within the National Landscape without an unacceptable impact.
- 4.8 SLR consultants have undertaken a detailed review of the landscape character of the surrounding area, and this is included with these representations at appendix 1.
- 4.9 The landscape review concludes that whilst an increased number of houses would extend over more fields than the allocation under policy BT7, the extent of landscape and visual effects caused by this proposal would not be significantly greater than those caused by an alternative development on BT7. Furthermore, the potential additional open space and area of habitat that the Wates proposal could provide would be more likely to further the purposes of the High Weald National Landscape than the very small area of open space available in BT7.
- 4.10 It is therefore recommended, from a landscape and visual perspective, that further consideration be given to enlarging the allocation of the site under policy BT7 to include more land to the south, both to deliver more new homes without significantly increasing landscape and visual effects, as well as to further the purposes of the National Landscape.

Heritage Considerations

- 4.11 The Heritage Technical Note provided by Orion Consultants is included with these representations at appendix 2. It is accepted that the development of the northern element of the site under policy BT7 will lead to less than substantial harm to the setting of the Grade II listed Lower Almonry Farmhouse.
- 4.12 There are a number of heritage assets in Battle including the conservation area and registered battlefield. The proximity of the site to these assets is shown below which shows the outline of the entire site with conservation area in orange, individual listed buildings and area of the historic battlefield in blue.

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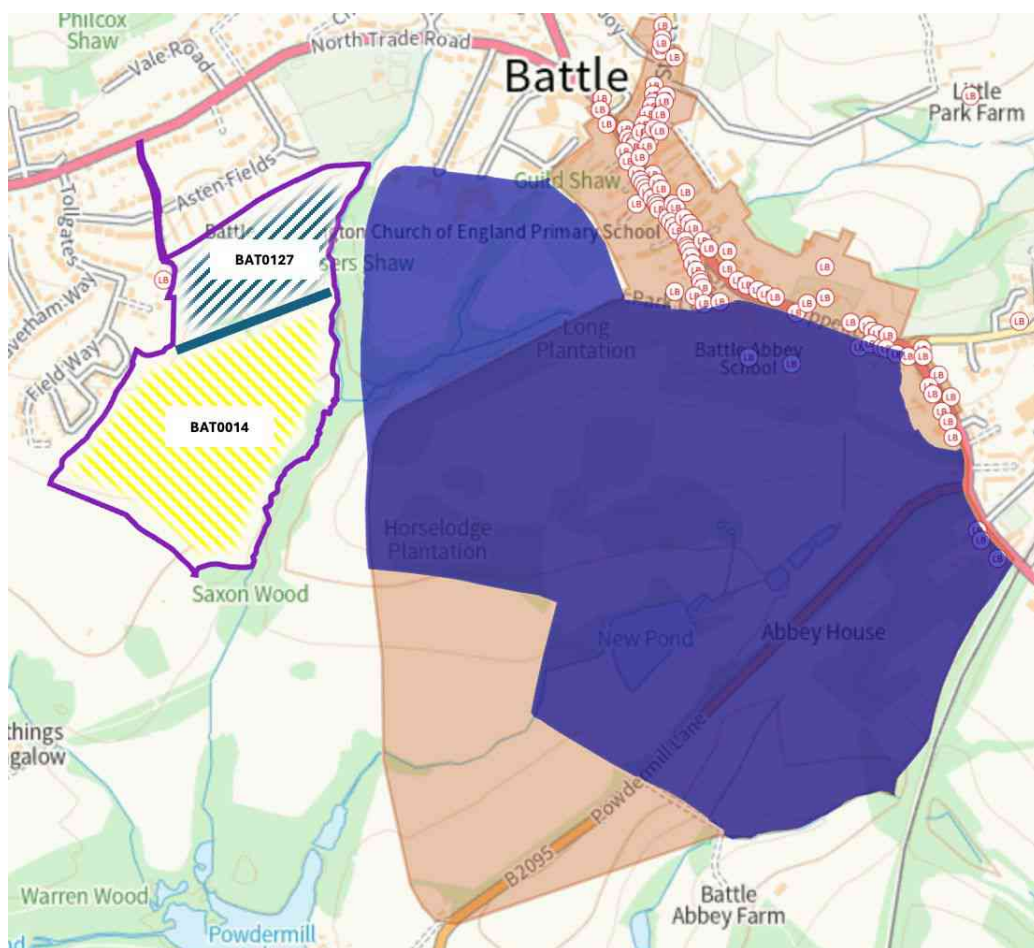


Figure 6 – Heritage Assets

- 4.13 This demonstrates that the additional area of the site to the south (BAT0014) is no closer to the heritage assets and particularly the historic battlefield than the northern element (BAT0127) of the site which is identified for development.
- 4.14 The additional area of the site to the south has limited intervisibility with Lower Almonry Farmhouse and no intervisibility with the Registered Battlefield or with the Battle Conservation Area and the designated heritage assets within it. The additional land his not considered to contribute to the significance of these designated heritage assets.
- 4.15 It is therefore considered that development of the southern area of the site would not lead to any additional level of harm to heritage assets than that already accepted as arising from the development of the area allocated under policy BT7.

Ecological/Arboricultural Considerations

- 4.16 It is not considered that development of additional areas of land would give rise to any significant adverse ecological impacts.
- 4.17 The southern area of land is no closer to existing off-site ancient woodland and no additional impacts would arise as a result of the combined being allocated for development.

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Illustrative Masterplan

- 4.18 An indicative masterplan for the site demonstrates how all the land at Almonry Farm could be developed in a way which is sensitive to the landscape setting of the site. The concept zoning plan and concept masterplan are included in the appendices of these representations.



Figure 7 – Indicative Masterplan (whole site)

- 4.19 In terms of impact of development on the character of the surrounding national landscape the imagery below shows the existing views from the south towards the recently developed housing in the foreground of the image in the context of the existing settlement of Battle.

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Figure 8 – Existing views of Battle from the south

- 4.20 The image below shows how sensitively designed housing could be developed across the wider site and this would retain the character of the surrounding national landscape and other constraints of the site.



Figure 9 – Indicative development of entire site.

- 4.21 Overall, it is considered highly logical for the additional area at Almonry Farm to be allocated under policy BT7. The additional land would accommodate a significant increase in dwellings, in the context of the significant under supply in the draft plan as currently presented.
- 4.22 The additional land area would not give rise to any significant impacts, and this can be confirmed through further SA testing and mitigated through further requirements added to any modification to policy BT7.



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5. Housing Need and Supply

- 5.1 Section 3 of the draft plan establishes that the housing need for the district, as established by the Government Standard Method is for 912 new homes per annum or 15,504 new homes over the 17 year plan period from 2025-2042.
- 5.2 This represents a significant uplift from the current housing need figure of 335 homes per annum as contained in the Core Strategy (2014).
- 5.3 The need for different dwelling types and sizes is established by the Housing and Economic Development Needs Assessment (April 2024) (HEDNA).
- 5.4 The HELAA and Housing Background Paper establishes that the affordability ratio in Rother has increased steadily from 9.33 in 2011 to a high of 13.82 in 2021. Paragraph 4.8 of the Housing Background Paper sets out that this upward trend is problematic as it demonstrates that house price growth is significantly outstripping wage growth, ultimately making housing more unaffordable for those who live and work within the district and potentially pricing out future local buyers.
- 5.5 The Housing Background Paper also shows concerning trends in relation to homelessness and number on the local authority housing register. Paragraph 4.14 of the paper shows that the number of households presenting themselves as homeless increased in Rother over the period 2017 to 2022, from 199 in 2016/17 to 431 in 2018/19 and 568 in 2022/23. The paper also shows that as of November 2023 the number of households on the local authority housing register was at 1,850 households. It is likely to have continued to increase in the two and half years since this figure was produced.
- 5.6 The HELAA also establishes that, taking into account current and future supply of affordable housing, there is an annual need for 238 affordable dwelling for rent and 87 affordable dwellings for purchase. This gives a net need for 325 affordable homes per year to 2044 in Rother. Paragraph 6.30 of the Housing Background Paper states that this requirement *substantially exceeds recent average delivery of affordable homes and actually exceeds the average number of all dwellings delivered per year in Rother since 2011.*
- 5.7 The latest Housing Land Supply position statement published by the council indicates a very poor level of affordable housing with an average of just 73 affordable housing completions per annum against a requirement of 243.
- 5.8 In terms of recent supply, Rother scored just 43% in the most recent Housing Delivery Test and delivered a total of 843 dwellings against a requirement of 1,967 dwellings.



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Year	Number of homes required	Number of homes delivered
2021/22	490	214
2022/23	740	239
2023/24	737	391
Total	1,967	843

5.9 The latest Housing Land Supply position published by the council in December 2024 establishes a deliverable five year housing land supply of 2,940 dwellings against a requirement of 5,592 or 2.63 years. This is a shortfall of 2,652 dwellings over the next five years of the plan period alone.

Housing Supply

5.10 Section 3 of the draft plan sets out the sources of supply which the district will use to meet housing need.

5.11 Regarding windfall sites, the HELAA establishes an average delivery of 39 dwellings which has been used in the draft plan.

5.12 Paragraph 3.24 of the draft plan establishes that, taking into account existing consents, windfall, and allocations, a housing target of 8,427 units per year can be achieved over the plan period or 495 units per annum. This would represent just 54% of the established housing requirement under the standard method.

5.13 This significant shortfall would be greater than being advanced by Three Rivers in their regulation 19 consultation which recently led to the Secretary of State intervening in February 2026 with a holding objection to the progression of the plan. A copy of this letter is attached to these representations at appendix 3 and in the letter the Secretary of State sets out:

As it stands, your emerging plan proposes to meet only 56 per cent of the local housing needs identified by the standard method, leaving a shortfall of over 5,000 dwellings, with little explanation publicly available to justify this approach.

Section 20 of the Planning and Compulsory Purchase Act 2004 (the 2004 Act) requires local planning authorities to only submit a plan when they think it is ready for an independent examination. Your own committee report highlights a high risk that the plan may fail at examination due to the scale of the shortfall in meeting housing need. As a result, I have little confidence that your emerging plan is satisfactory and capable of being found sound or legally compliant at examination.

5.14 The letter to Three Rivers was followed up in March 2026 with a further letter from Matthew Pennycook requiring significant modifications to the plan including allocation of further



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named sites for development. A copy of this latest letter is also contained in appendix 3 of these representation.

- 5.15 Also of relevance is the letter from Matthew Pennycook to Hastings Council in February 2026 (also included in appendix 3 of these representations). This reiterates the position of the government that if local authorities cannot meet the identified housing need, then they should revisit their assessments and assumptions about development potential of specific sites.
- 5.16 Given that the shortfall being advanced in the Rother Plan is of a greater percentage shortfall and is a significantly greater actual shortfall being proposed at Three Rivers, it is considered that additional sources of housing delivery will be required in order for the plan to be found sound. As set out by the Secretary of State in the letter to Hastings, it will be necessary for the council to revisit previous assessments of development sites. An obvious and entirely logical route would be for the allocation of additional land at Almonry Farm which would increase the capacity of the site for delivery of housing.



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6. Development Strategy and Principles

6.1 The development strategy for Rother is split into five spatial sub areas as set out in figure 12 of the draft plan:

- Bexhill;
- Hastings Fringes and settlements that radially link to Hastings;
- **Battle and its cluster of connected settlements;**
- Rye and its cluster of connected settlements; and
- Northern Rother – the settlements in the north-east of the district.

6.2 The Vision for Battle and Surrounding Settlements is set out in section 5 of the draft plan as follows (with emphasis added):

Battle will retain its historical character at its core and preserve its local distinctiveness and important setting within the High Weald NL. Employment opportunities will be enhanced through sensitive higher density commercial development within the town and in surrounding commercial areas. Opportunities for brownfield residential development within the urban areas of Battle will be realised with higher densities achieved in sustainable locations.

A greater amount of sensitive growth will take place south of North Trade Road and west of Hastings Road with linked opportunities for habitat creation, restoration, enhancement and community access.

Sensitive small-scale development will be delivered in villages surrounding Battle, at densities consistent with the surrounding area, where it is sustainable and does not negatively impact the setting of the High Weald NL. A small level of growth will help support improving the overall sustainability and vitality of the cluster of villages around Battle, through supporting existing services and facilities as well as delivering developer contributions for wider community benefit. This will ensure that health and wellbeing and community cohesion is maintained and improved.

6.3 The development of Almonry Farm, south of North Trade Road, would directly align with the vision for Battle. The council is clear in directing a higher level of sensitive growth to the south of North Trade Road where the site is located and this is considered further justification for an increase in capacity from the allocation at Almonry Farm.

Housing Requirement and Supply

6.4 Figure 21 of the draft plan sets out the identified level of Housing Growth in Battle and the surrounding settlements as follows:



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Settlement Area	Identified Level of Housing Growth	Potential Additional Level of Housing Growth	Total Potential Housing Growth (Identified + Additional)
Battle	260	225	485
Sedlescombe	75	15	90
Catsfield	35	25	60
Netherfield	33	0	33
Brightling (Parish)	0	0	0
Total Growth	403	265	668

Housing Delivery

6.5 It is therefore clear that the council has cannot meet the established housing need through the existing commitments and site allocations identified in the plan.

6.6 The Planning Practice Guidance sets out the approach to be taken if there are insufficient sites / broad locations to meet needs as follows:

When preparing strategic policies, it may be concluded that insufficient sites / broad locations have been identified to meet objectively assessed needs, including the identified local housing need.

In the first instance, strategic policy-making authorities will need to revisit their assessment, for example to carry out a further call for sites, or changing assumptions about the development potential of particular sites to ensure these make the most efficient use of land. This may include applying a range of densities that reflect the accessibility and potential of different areas, especially for sites in town and city centres, and other locations that are well served by public transport.

If insufficient land remains, then it will be necessary to investigate how this shortfall can best be planned for. If there is clear evidence that strategic policies cannot meet the needs of the area, factoring in the constraints, it will be important to establish how needs might be met in adjoining areas through the process of preparing statements of common ground, and in accordance with the duty to cooperate. If following this, needs cannot be met then the plan-making authority will have to demonstrate the reasons why as part of the plan examination.

Paragraph: 025 Reference ID: 3-025-20190722 - Revision date: 22 07 2019

6.7 Paragraph 3.18 of the Housing Background Paper sets out the steps the council has undertaken since the previous HELAA was published in 2024 in line with the guidance:

- *Relaunched the 'Call for Sites' in summer 2025, which has been open since Autumn 2020 (and remains open), and assessed new sites submitted;*



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- *Reviewed representations on the first Regulation 18 consultation on the Draft Rother Local Plan (April 2024), including comments on the Draft HELAA;*
- *Checked planning records to confirm the latest status of sites with planning permission (i.e., not started, under construction, built or lapsed);*
- *Re-assessed Draft HELAA sites to determine whether they are suitable for development. This includes re-assessing previously rejected sites, particularly those known to be available, to determine whether development could be made acceptable in principle across all or part of the sites;*
- *Undertaken extensive site visits;*
- *Engaged with landowners and developers to understand whether land identified is available for development, and if so, the expected timeframes for this; and*
- *Re-assessed the development potential of suitable sites by considering density options, to ensure the optimal use of land.*

6.8 Whilst the council has suggested that draft HELAA sites were reassessed, there is no evidence on how this was undertaken nor are any findings of this process published. Wates has consistently informed the council of the availability and deliverability of the entirety of Almonry Farm and has demonstrated how it could be developed for housing whilst protecting the constraints of the site.

6.9 Nevertheless, the plan seeks to allocate only a smaller amount of land at Almonry Farm for development. For the reasons set out within these representations a larger land parcel would lead to an optimising of the site for delivery of housing which would meet the well-established shortfall in the plan as currently presented.

Housing Density

6.10 The Density Study (2026 Update) forms part of the evidence base for the plan. The study builds upon the previous Density Study (2024) and seeks to justify that compact forms (25-55dph) are consistent with existing local character.

6.11 The study concludes that the local plan should apply a minimum density expectation dependent on the accessibility tier that sites are located in. Figure 9 of the plan sets out the density options by settlement type and shows a density range of 45-75dph in Suburban Areas in Battle.

6.12 Whilst a high density of development would clearly optimise housing delivery from allocations it is not considered that such an approach would be sensitive to the development constraints of this particular site, and indeed many sites in the district. As consistently set out throughout these representations, an increase in housing delivery from the site can be achieved through the allocation of a larger area of land which can be developed in a sensitive manner and would respond to the identified constraints on site.



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7. Sustainability Appraisal

- 7.1 A Sustainability Appraisal (SA) has been published alongside the draft Local Plan.
- 7.2 The SA scores all sites against the key SA objectives / criteria. The scoring mechanism is set out in figure D of the SA as follows:

Symbol	Explanation
++	Option has potential significant beneficial effect.
+	Option supports the objective, or elements of the objective on balance, although potential beneficial effects may be minor.
o	Option has no effect or is irrelevant; or Overall effect is neutral insofar as the benefits and drawbacks appear equal and neither is considered significant; or Uncertain or insufficient information on which to determine the assessment at this stage.
-	Option appears to conflict with the objective on balance and may result in potential minor adverse effects.
--	Option has potential significant adverse effects.

- 7.3 The scoring for site BT7 is set out below with comments made against each in turn and a rating as considered by the promoters of the site.

SA Criteria / Objective	SA Score	SA Methodology Comments for score	Comments from Wates	Suggest Scoring
1a Settlement Sustainability	+	<i>Site located in 'sustainable' or moderately' sustainable location</i>	Agree	+
2a SSSI Impact Risk Zone	0	<i>Site not located within an IRZ</i>	Agree	0
2b Ancient Woodland	-	<i>Site is adjacent to (within 50 metres of) ancient woodland</i>	The standard guidance requires a 15m buffer. The indicative layout shows that an adequate buffer would be provided so actual impact would be neutral.	0
2c TPOs	0	<i>Site does not contain a TPO</i>	Agree	0
2d Priority Habitats	-	<i>Site is adjacent to priority habitat</i>	This is factually correct but indicative masterplan	0



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			proposes buffers to proposal would mitigate to neutral impact.	
3a Decentralised Energy	0	Site not located within a potential heat network cluster	Agree	0
3b Settlement sustainability	+	Site located in 'sustainable' or 'moderately' sustainable location	Agree	+
5a EA Flood Risk Map	0	Flood Zone 1	Agree	0
5b Surface Water Flood Risk	--	Contains land with high risk (>3.3% AEP)	Surface Water Flooding limited to area around existing watercourses which will be retained and provided with buffer	0
5c Groundwater flood risk	+	Groundwater levels are more than 5m below the ground surface.	Agree	+
6a Coastal Change Management Area	0	Site is not within a CCMA	Agree	0
7a Access to essential services	+	Site in settlement with good access to essential services	Agree	+
7b Access to public open space	+	Site within 400m of a public open space of any type	Agree	+
7c Access to Public Right of Way	+	Site within 400m of a PRoW	Agree	+
9a Settlement Sustainability	+	Site located in 'sustainable' or 'moderately' sustainable location	Agree	+
11a Heritage Assets	-	Designated heritage asset(s) adjacent to the site	The indicative layout mitigates any harm to heritage assets to less than substantial harm	-
11b Area of archaeological potential	0	Site outside of archaeological notification area	Agree	0
12a Agricultural Land Classification	-	Good (Grade 3a) or Moderate (Grade 3b) quality	Agree	-
14a Source Protection Zone	0	Site does not contain land within a SPZ	Agree	0
15a National Landscape – relative location	--	Site is located within National Landscape	Site is within NL but proposed masterplan shows impact can be mitigated to minor negative at most	-
15b National Landscape –	-	Medium Impact	Agree	-



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sensitivity (applies only to sites in the National Landscape)				
15d Type of land	--	<i>Site is fully greenfield land</i>	Factually correct but accepted that many types of this site will need to come forward to meet housing need	n/a
17a Existing Employment or commercial uses	0	<i>The site does not contain an existing employment or commercial uses</i>	Agree	0
20a Public Transport access	+	<i>Site within a settlement with access to a train station and good bus service</i>	Agree	+

7.4 Paragraph 35 of the NPPF requires a local plan to consider ‘reasonable alternatives’ in order to be considered as ‘justified’ in the tests of soundness.

7.5 The Planning Practice Guidance sets out the following requirements in this regard:

The sustainability appraisal needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted. In doing so it is important to:

- *outline the reasons the alternatives were selected, and identify, describe and evaluate their likely significant effects on environmental, economic and social factors using the evidence base (employing the same level of detail for each alternative option). Criteria for determining the likely significance of effects on the environment are set out in schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004;*
- *as part of this, identify any likely significant adverse effects and measures envisaged to prevent, reduce and, as fully as possible, offset them;*
- *provide conclusions on the reasons the rejected options are not being taken forward and the reasons for selecting the preferred approach in light of the alternatives.*

Any assumptions used in assessing the significance of the effects of the plan will need to be documented. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made.

The development and appraisal of proposals in plans needs to be an iterative process, with the proposals being revised to take account of the appraisal findings.



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Paragraph: 018 Reference ID: 11-018-20140306

Revision date: 06 03 2014

- 7.6 In relation to reasonable alternatives, paragraph 5.23 of the SA sets out the following position:

At this stage in the plan process, the Council considers the reasonable alternative sites to be those sites that have been submitted through the 'Call for Sites' or are otherwise understood to be potentially available but have been rejected through the HELAA on the basis that they are not suitable and/or achievable.

- 7.7 Paragraph 5.31 of the SA goes on to set out

As noted above, all sites that have been identified in the HELAA as suitable, available and achievable have been taken forward as site allocations in the draft Local Plan. However, not all such sites have been assessed using the Appendix 3 template. As set out in Figure 29 below, sites with a planning permission or resolution to grant have not been appraised. This is on the basis that they have been assessed through the development management process - and through this have been judged to comply with the policies in the extant Development Plan and NPPF, which both seek to contribute towards the delivery of sustainable development.

- 7.8 This is factually correct and the comments in this section relate to the SA appraisal of the land allocated within site BT7.

- 7.9 The SA then goes onto state at paragraph 5.32:

Of other sites that are suitable, available and achievable - extant site allocations, including those in Neighbourhood Plans, which have not yet been delivered, have been assessed using the Appendix 3 template, along with potential additional sites (i.e., new sites identified through the HELAA which are not currently allocated and do not have planning permission). Sites submitted via the 'Call for Sites', or which are understood to be potentially available, but rejected by the HELAA have also been considered, as they comprise reasonable alternatives at this time.

- 7.10 Appendix 3 sets out numerous rejected HELAA sites within Battle but curiously omits any assessment of the site to the south of the BT7 allocation which is assessed in the HELAA under BAT0014.

- 7.11 In conclusion to reasonable alternatives the SA sets out the following *reasons for choosing the preferred option sites* at paragraph 5.38 as follows:

The preferred option sites have been identified through the HELAA, by being assessed through that process as meeting the criteria of suitable, available and achievable, in accordance with the NPPF and PPG. At this stage in the preparation of the Local Plan, the sites identified through the HELAA as meeting these criteria are insufficient to accommodate the number of homes required to meet Rother's Local Housing Need (LHN) as calculated through the national "standard method". Therefore, all sites assessed through the HELAA as suitable, available and



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achievable are included as preferred options and have been progressed to proposed allocations in the draft Local Plan. The SA has informed the detail of the proposed site allocation policies, for example, to identify mitigations to enhance the sustainability of sites. As noted above, sites rejected through the HELAA as unsuitable, but which are known to be available, have also been subject to SA as these sites comprise reasonable alternatives at this time. The SA of these sites may help to inform considerations later in the plan process, should the sites be brought forward into the Plan.

7.12 It is therefore clear that the council has failed to properly assess the reasonable alternative of allocating additional land under site BT7 (or any of the proposed allocations) to the extent of how this would meet the SA objective to meet housing need.

7.13 An assessment against the SA objectives has been made for the combined site as shown in the iterative masterplan attached to these representations.

SA Criteria / Objective	SA Methodology Comments for score	Comments from Wates	Suggest Scoring
1a Settlement Sustainability	<i>Site located in 'sustainable' or moderately' sustainable location</i>	The combined site is sustainable as confirmed in the SA	+
2a SSSI Impact Risk Zone	<i>Site not located within an IRZ</i>	Agree. Impact the same if wider site developed.	0
2b Ancient Woodland	<i>Site is adjacent to (within 50 metres of) ancient woodland</i>	The standard guidance requires a 15m buffer. The indicative layout shows that an adequate buffer would be provided so actual impact would be neutral. Impact the same if wider site developed.	0
2c TPOs	<i>Site does not contain a TPO</i>	No TPO affected by I larger site area.	0
2d Priority Habitats	<i>Site is adjacent to priority habitat</i>	This is factually correct but indicative masterplan proposes buffers to proposal would mitigate to neutral impact. Impact the same if wider site developed.	0
3a Decentralised Energy	<i>Site not located within a potential heat network cluster</i>	Agree	0
3b Settlement sustainability	<i>Site located in 'sustainable' or moderately' sustainable location</i>	As above	+
5a EA Flood Risk Map	<i>Flood Zone 1</i>	No additional impact if wider site developed.	0



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5b Surface Water Flood Risk	<i>Contains land with high risk (>3.3% AEP)</i>	Surface Water Flooding limited to area around existing watercourses which will be retained and provided with buffer. More opportunity for attenuation with wider site	0
5c Groundwater flood risk	<i>Groundwater levels are more than 5m below the ground surface.</i>	Agree	+
6a Coastal Change Management Area	<i>Site is not within a CCMA</i>	No additional impact if wider site developed.	0
7a Access to essential services	<i>Site in settlement with good access to essential services</i>	Agree	+
7b Access to public open space	<i>Site within 400m of a public open space of any type</i>	Agree	+
7c Access to Public Right of Way	<i>Site within 400m of a PRoW</i>	Agree	+
9a Settlement Sustainability	<i>Site located in 'sustainable' or 'moderately' sustainable location</i>	Agree	+
11a Heritage Assets	<i>Designated heritage asset(s) adjacent to the site</i>	The indicative layout mitigates any harm to heritage assets to less than substantial harm. No additional impact if wider site developed.	-
11b Area of archaeological potential	<i>Site outside of archaeological notification area</i>	Agree. No additional impact if wider site developed.	0
12a Agricultural Land Classification	<i>Good (Grade 3a) or Moderate (Grade 3b) quality</i>	Agree. No additional impact if wider site developed.	-
14a Source Protection Zone	<i>Site does not contain land within a SPZ</i>	Agree. No additional impact if wider site developed.	0
15a National Landscape – relative location	<i>Site is located within National Landscape</i>	Site is within NL but proposed masterplan shows impact can be mitigated to minor negative at most. No additional impact if wider site developed.	-
15b National Landscape – sensitivity (applies only to sites in the National Landscape)	<i>Medium Impact</i>	Agree. No additional impact if wider site developed.	-
15d Type of land	<i>Site is fully greenfield land</i>	Factually correct but accepted that many	n/a



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		types of this site will need to come forward to meet housing need	
17a Existing Employment or commercial uses	<i>The site does not contain an existing employment or commercial uses</i>	Agree	0
20a Public Transport access	<i>Site within a settlement with access to a train station and good bus service</i>	Agree	+

- 7.14 It is therefore clear that the development of the wider site would not lead to any additional sub-optimal outcomes when assessed against the sustainability objectives. The failure of the council to properly assess the wider site is an unfortunate oversight and would be a failing in the duty to consider reasonable alternatives. However, this is a matter which can be remedied through additional testing in the next stages of the local plan process.
- 7.15 In general, the consideration of providing more housing within the plan in an attempt to address the significant shortfall has been assessed by solely applying a higher density to existing allocations rather than consideration of additional allocations or expansion of existing ones. It is therefore considered that in order for the plan to be procedurally sound, the council must properly assess the development of the wider site at Almonry Farm against the SA objectives.



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8. Conclusions

- 8.1 Overall, the general direction of travel for the local plan is supported but it is clear that modifications are required to the plan to enable it to be ready for examination to represent a robust plan which meets the tests of soundness.
- 8.2 The allocation of the northern fields at Almonry Farm in Battle under policy BT7 within the draft plan is welcomed, however it is considered that a larger area of the site is suitable for development than the restricted area shown in the plan.
- 8.3 As proposed, the plan would represent a significant shortfall in housing delivery against the established housing target under the government standard method. This should be viewed in the context of the historic undersupply of housing in the district and the chronic lack of five year housing land supply under the present plan. This has resulted in a significant shortfall in overall housing but more critically a lack of affordable housing delivery against well-established needs.
- 8.4 The constraints of the Battle and the wider district in so far as national landscape and heritage are all acknowledged but it is considered that development of additional housing at Almonry Farm , and indeed through other sites, must be considered if the plan is to be found sound.



Almonry Farm, Battle

Appendix 1 - Landscape Review: SLR Consultants



To: Lorea Johnston

From: Jeremy Smith

Company: Wates Developments Limited

SLR Consulting Limited

Date: 26 February 2026

Project No. 403.V06269.00045

**RE: Land at Almonry Farm, Battle
Response to Draft Allocation BT7 in the Emerging Rother Local Plan**

1.0 Introduction and Objectives

In the emerging Rother Local Plan (currently at Regulation 18 stage) site reference BT7, located at Almonry Farm, Battle, is proposed as being capable of accommodating up to approximately 80 homes. The location and extent of this proposed allocation is illustrated on **Plate I**, below.



Plate I: Proposed allocation BT7 at Almonry Farm, Battle (taken from Regulation 18 Rother Local Plan)

SLR Consulting Ltd (SLR) was instructed in August 2020 by Wates Developments Limited (Wates) to provide landscape and visual guidance for a potential new residential development at land at Almonry Farm, Battle. Based upon desk-top and thorough site analysis, SLR has advised on the most suitable extent and character of residential development in this location. On 17th September 2025 SLR issued a summary of its Landscape and Visual Analysis, (the main body of which is also included at **Appendix 1** to this report for ease of reference), which also included the landscape design principles that flowed from this analysis. Based upon these principles, SLR concluded that a larger site, the boundaries of which are illustrated in **Plate II**, below, has capacity to accommodate up to 180 homes.



Plate II: boundaries of the potential site at Almonry Farm proposed by Wates Developments Ltd.

This report considers the potential form of development that could come forward for both of these site options, and then considers the landscape and visual advantages and disadvantages of both. The consideration of potential of potential landscape and visual effects is of particular importance since the site is located within the High Weald National landscape. The NPPF (paragraph 189) states that “*great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes*”. Furthermore, the Levelling Up and Regeneration Act (s245) requires that development proposals should also “*further*” the purposes of the designation.

Whilst this report does not purport to be a landscape and visual appraisal (LVA), it does use principles and terms which are accepted parts of the LVA process, and which are defined in the Guidelines on Landscape and Visual Appraisal (Third Edition, GLVIA3, Landscape Institute/IEMA, 2013).

2.0 The Potential Form of Development on BT7

Draft Policy BT7 states that approximately 2.4ha of the site would be developed for housing, at a density of 35 dph, providing approximately 80 homes. The draft policy also states that an area of open space would be provided at the west of the site to protect the setting of the grade II Lower Almonry farmhouse.

If this form of development allows a minimum of 15m standoff to the ancient woodland at Manser’s Shaw, to the east, and a minimum stand off at least 5m to existing hedgerows (noting that some mature trees would need a wider stand off to protect their RPAs) then it is just possible that 2.4ha of development could be fitted into the eastern field of BT7, with the western field remaining open to protect the setting of the listed building. It is estimated that the size of the western field is approximately 1.2ha, and this would need to serve as both the POS for the development whilst also providing the required biodiversity net gain.

As the SLR Landscape and Visual Analysis explains, the position of new built form in relation to topography is also an important consideration, as Battle is historically a ridge top settlement surrounded by steep, wooded slopes, with the majority of built form being located above 60m AOD. Proposed allocation BT7 would only extend below the 60m AOD contour at its eastern edge, but would be largely above this level.

3.0 The Potential Form of Development on the Wates Site

The illustrative landscape masterplan prepared by architects ReFormat (drawing reference P20044-RFT-XX-XX-DR-A-0100), is set out at **Plate II**, below. This proposal follows the design principles set out in the SLR Landscape and Visual Analysis, and would provide approximately 180 homes at a density of approximately 35dph. The net developable area of built form would approximately 5.2ha, and the proposal would also provide approximately 7.5ha of new public open space, including new woodland planting and meadows, which provides considerable scope for biodiversity net gain.

As for BT7, this proposal would retain an open field east of the listed building at Almonry Farm, and once more a minimum stand-off of 15m to the ancient woodland to the east would also be retained, with the RPAs of mature trees and hedgerows also being protected by stand-offs.



Plate II: Extract from ReFormat’s illustrative masterplan for residential development at Almonry Farm, Battle, which follows the Design Principles set out in SLR’s landscape Landscape and Visual Analysis.

As for BT7, the ReFormat illustrative masterplan shows development almost entirely above 60m AOD, with only a minor incursion below this level.

4.0 Landscape and Visual Advantages and Disadvantages of BT7 and the Wates Option

4.1 Comparison of the Potential Landscape-Related Effects of the Two Proposals

In terms of **settlement form and setting**, both the BT7 and Wates proposals would be sited largely above 60m AOD, and would thus retain the tradition ridge top form of Battle. Open wooded slopes would also continue to extend to the south of proposed housing in both proposals, retaining the traditional setting of the settlement.

In both proposals the **setting of grade II listed Almonry Farm** would be protected by retaining the open field to the east of this heritage asset. Further analysis of heritage effects is provided by Orion Heritage.

Both proposals have sufficient space to be able to provide suitable stand-offs to **protect existing hedgerows, trees and the ancient woodland** to the east. These elements are essential elements of both the High Weald and more specifically LCA 10, Combe Haven Valley.

In terms of **protecting existing rights of way**, both would be able conserve the route of footpath BAT/82/1 to the north of the proposed housing area, although both would lose some of the open views to the south from this footpath due to the introduction of the new homes.

In relation to **providing new opportunities for open space and recreation**, BT7 would be able to provide approximately 1.2ha of space at the west of the site. Given that this field would also provide the setting for the listed building care would need to be taken with the form and positioning of play equipment. The Wates site has considerably more scope for providing new recreational facilities, with approximately 5.2ha of open space, 4.5 times the amount potentially provided by BT7.

The small scale of BT7 provides little scope for the **biodiversity net gain** that the draft policy requires. Only the western field would be available for habitat creation, and this field also has to provide both the setting for the listed building and part of the POS provision. It would therefore not be possible to provide, for example, large areas of new woodland or scrub on this field, and even the potential for creating species rich grassland would be limited by the need to provide recreational open space. In contrast, the much larger area of open space which would be provided by the Wates proposal provides sufficient space for extending the nearby ancient woodland with new tree and shrub planting, providing areas of scrub and also species rich grassland, whilst also providing areas for more intensive recreational activities.

In terms of the potential **effects of both options upon the character of the High Weald National Landscape and the Combe Haven Valley landscape character area**, both BT7 and the Wates proposal would result in localised landscape harm, caused by the introduction of built form to open fields. However, both proposals would introduce housing to an area which is already visually influenced by built form to the north and to the west, as well as by lighting and noise from the existing settlement, and would consequently not be introducing an entirely new and anomalous element into the landscape. Furthermore, the geographical extent of potential landscape effects would be reduced due to the strong visual barriers around the site, comprising Battle ridge and built form to the north and west, mature woodland to the east, and mature hedgerows and trees to the south.

4.2 Comparison of the Potential Visual Effects of the Two Proposals

For both proposals the **potential overall visibility** of new built form would be contained and localised by existing elements on all sides of the site, including existing housing and Battle ridge to the west and north, and hedgerows and mature woodland to the east and south.

Both proposals have potential to result in **visual harm for residents**, resulting from the effects of new built form on filtered views from residential properties to the north (Asten Fields) and west.

Both proposals would also result in localised visual harm on the **views of walkers** using footpath BAT/82/1, with new built form obstructing some open views to the south. For both schemes there would be only minor potential for visual harm on walkers using footpath BAT/87/1, to the east of Mansers Shaw, and the 1066 Country Walk (BAT/88/2) to the south, due to the screening existing intervening mature vegetation.

For both proposals there is a minor potential for views of new built form on **viewers at the top of the Gatehouse at Battle Abbey**. However, in both scenarios proposed housing would occupy only a small proportion of the view, with existing housing to the west and north of both sites being on higher ground than the site and much more prominent in the view.

5.0 Summary and Conclusions

This report has considered the potential landscape and visual effects of providing approximately 80 homes on the proposed allocation site BT7 at Almonry Farm, Battle. It has compared these effects with those that would result from the provision of approximately 180 homes on a larger site proposed by Wates Developments in the same location.

It is accepted amongst landscape professionals that all development of built form on a green field site will result in at least localised landscape and visual harm, and that is also the case with both of these development alternatives. Both would result in localised harm to the valued landscape of the High Weald, and both would also result in harm to views of both walkers and to a lesser extent residents.

Both proposals have scope to retain the existing hedgerow network and to protect the ancient woodland to the east, and both have sufficient space to protect the setting of the grade II listed Almonry farmhouse, as well as the existing route of the footpath to the north. Both proposals would have limited potential for wider visibility due to the existing landform and built form to the west and north, and existing mature vegetation to the east and south.

However, only the Wates proposal would have potential to provide significant areas of new open space that have potential to deliver both significant recreational benefits and also biodiversity net gain, with 5.2ha of open space available. In comparison, BT7 would have approximately 1.2ha of available space for these elements, with the western field of this site having to serve as POS, land for biodiversity net gain as well as the setting of the grade II listed Almonry Farm.

Whilst the proposed number of houses in the Wates proposal would extend over more fields than BT7, the extent of landscape and visual effects caused by this proposal would not be significantly greater than those caused by an alternative development on BT7. Indeed, the potential additional open space and habitat that the Wates proposal could provide would be more likely to further the purposes of the High Weald National Landscape than the very small area of open space available in BT7.

It is therefore recommended, from a landscape and visual perspective, that further consideration be given to enlarging BT7 to include more land to the south, both to deliver more

new homes without significantly increasing landscape and visual effects, as well as to further the purposes of the National Landscape.

Appendix 1: SLR September 2025 Landscape and Visual Analysis and Design principles for Almonry Farm, Battle

To: Lorea Johnston

From: Jeremy Smith

Company: Wates Developments Limited

SLR Consulting Limited

Date: 17 September 2025

Project No. 403.V06269.00045

RE: Land at Almonry Farm, Battle
Landscape and Visual Analysis informing the Illustrative Masterplan

1.0 Introduction and Objectives

In the emerging Rother Local Plan (currently at Regulation 18 stage) Battle is identified as being able to accommodate a total of 485 additional homes, plus additional employment uses: land at Almonry Farm is recognised by the Council as being a potential location for a proportion of these new homes.

SLR Consulting Ltd (SLR) was instructed in August 2020 by Wates Developments Limited (Wates) to provide landscape and visual guidance for a potential new residential development at land at Almonry Farm, Battle. In December of 2020 SLR provided a Preliminary Landscape and Visual Appraisal, which identified the key landscape and visual receptors in and around the site, and the potential for development to cause landscape and visual effects.

Based upon this initial assessment, and further site-based studies carried out in both summer and winter months, SLR has continued to advise on the most suitable form and extent of development on the site. **This document provides a summary of some of the key landscape and visual principles that now form an integral part of the latest ReFormat illustrative Masterplan** (reference P20044-RFT-XX-XX-DR-A-0100). The objective of these principles is to:

- **Ensure that the proposals are landscape-led, as befits the site's location in the High Weald National Landscape;**
- **Promote design of the highest quality, in accordance with National and District policies;**
- **Reduce the potential landscape and visual effects of the proposed development** (although recognising that all green field residential developments will result in at least localised landscape and visual harm);
- **Ensure that the proposed built form accords with existing distinctive settlement form and setting;**
- **Provide green infrastructure of an appropriate quantity and character in order to respect the sensitive landscape setting.**

In order to define these principles the report first considers the relevant planning context, the landscape characteristics of the site, and key views into and out of the site. Drawings **BLC1** to **BLC24** provide an analysis of the topography of Battle, as well as site photographs taken in February 2025.

Whilst this report does not purport to be a landscape and visual appraisal (LVA), it does use principles and terms which are accepted parts of the LVA process, and which are defined in the Guidelines on Landscape and Visual Appraisal (Third Edition, GLVIA3, Landscape Institute/IEEMA, 2013).



Plate BLCI: aerial photograph of the site and its context, looking towards the west towards the new housing at Field Way (the approximate extent of the site is shown by the red line). The sloping, irregularly shaped fields and thick hedgerows are clearly visible, and the Ancient Woodland at Manser's Shaw and Saxon Wood is clearly visible in the foreground of the view.

2.0 Planning Context

2.1 Introduction

This section focuses on the aspects of the planning context which are of most relevance to the landscape and visual principles which underpin the latest illustrative masterplan. Key areas covered therefore include:

- Landscape and landscape-related designations
- The NPPF
- The Development Plan, including the adopted and emerging Rother Local Plan, the High Weald Management Plan and the Battle Neighbourhood Plan
- Relevant Planning Guidance, including the Battle Conservation Area Appraisal and the High Weald Housing Design Guide

2.2 Landscape and Landscape-Related Designations

As the SLR Preliminary LVA noted, the site and its wider setting is within the High Weald National Landscape (previously Area of Outstanding Natural Beauty, AONB), (see also Plate **BLCII**, below). Notably, approximately 82% of Rother District is also within this designation.

Section 245 of the Levelling Up and Regeneration Act requires that proposals within National Landscapes should “*seek to further*” the statutory purposes of the designation; the main purpose of the National Landscape, as set out at paragraph 82 of the Countryside and Rights of Way (CROW) Act 2000 is “*conserving and enhancing the natural beauty of the area*”.

Over 50 metres to the east of the site, beyond a belt of Ancient Woodland, is the Battlefield of the Battle of Hastings, which also forms part of the grade II* registered Park and Garden of Battle Abbey. The Abbey and Registered Park and Garden (grade II*) also form part of Battle Conservation Area. The nearest listed structure is the grade II listed Lower Almonry Farmhouse, immediately to the north-west of the site.

Public footpath 82 passes along the northern edge of the site, and a recently constructed footpath passes through the Ancient Woodland belt to the east of the site. Further to the east is footpath 87, which passes through the registered battlefield, and the 1066 Country Walk, a branch of which runs to the east and then south of the site.

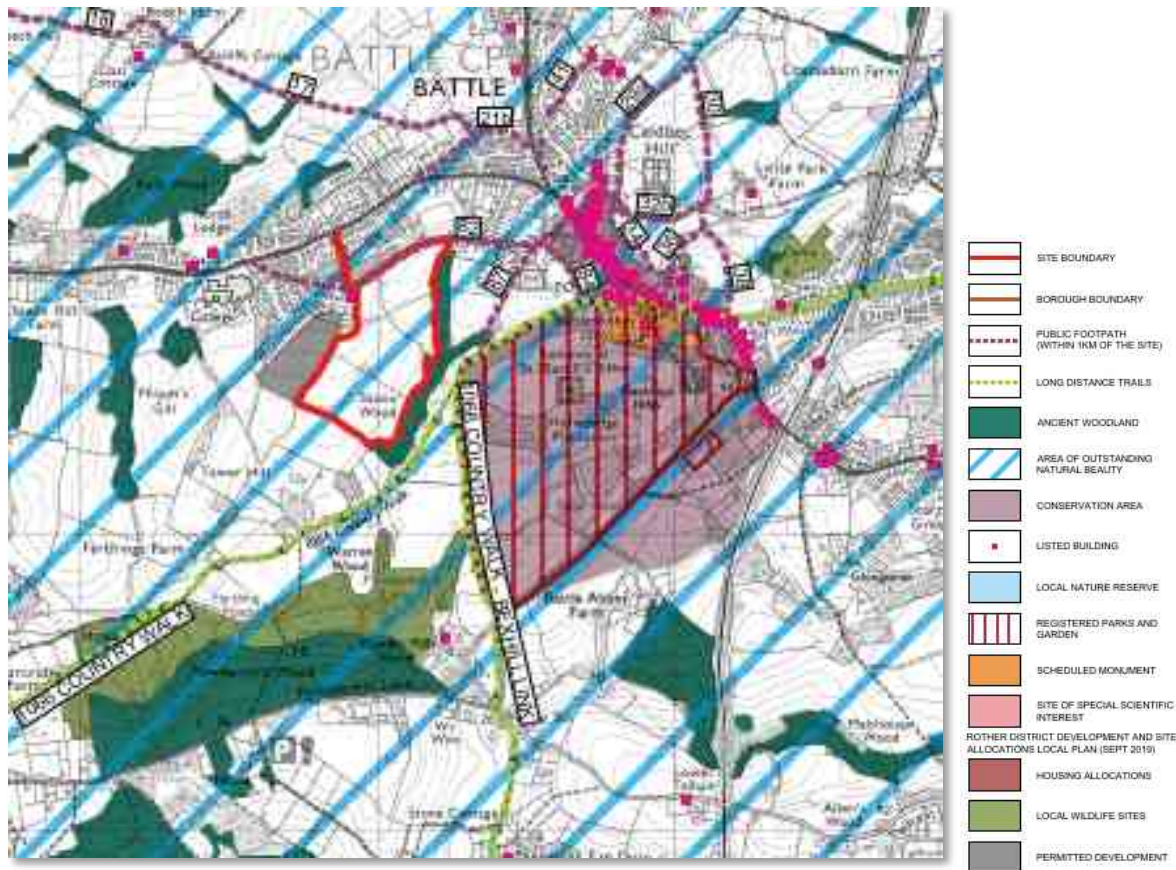


Plate BLCII, taken from drawing B-01 in the SLR preliminary LVA. Land at Almonry Farm is defined with a red line, the National Landscape (AONB) is shown with blue hatch, and the Battle Conservation Area is shown with purple shading; the battlefield of the Battle of Hastings is a registered Park and Garden and is shown with a vertical red hatch. Dark green areas are ancient woodlands, and pink squares are listed buildings.

2.3 The National Planning Policy Framework

On design, the NPPF states at paragraph 131 that *“the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities”*.

On landscape matters, paragraph 189 states that *“great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues”*.

2.4 The Adopted and Emerging Local Plan

The adopted Local Plan comprises the Core Strategy (September 2014), and the Site Allocations Local Plan (December 2019). The Core Strategy states that the strategic objective for Battle is *“to support the market town and tourist centre role and character of Battle, and conserve its historic core and setting”*, (11.4, also chapter 6). Objectives for Battle also include *“to conserve the key characteristics of the town and its setting that contribute to the AONB”* and also *“to preserve and enhance the historic character of Battle Abbey and Battlefield and maintain the town’s physical identity”*.

As has been noted, a new Local Plan is now being prepared and is currently at Regulation 18 stage. The draft plan envisages that there will be a need for further development at Battle, and the site at Almonry Farm is seen as one potential location for development.

2.5 Battle Neighbourhood Plan (2019-2028)

The Battle Neighbourhood Plan, made in June 2021, states as part of its Vision Statement that *“the preservation of our countryside and heritage is a priority”*.

Policy HD4 states that *“Proposals for all development must plan positively for the achievement of high quality and inclusive design, at the same time demonstrating they have sought to conserve local distinctiveness and the aesthetic qualities of traditional rural settlements and buildings found in the conservation areas and their setting”*.

Policy HD5 states that *“development proposals, which have the potential to have an impact on the landscape should be informed by landscape and visual assessment to identify site characteristics and views, which may be affected and to inform required landscape mitigation. The design of new landscape features should happen at an early stage in the design process to ensure they are well integrated into new developments. New development proposals should consider and correctly interpret the landscape character of their location to produce the most appropriate locally distinctive design solution for the development supported from a biodiversity perspective. Landscape schemes should therefore:*

- 1. integrate new development sympathetically with its surroundings;*
- 2. enhance the setting of new buildings;*
- 3. create a high-quality environment in, which to live and work;*
- 4. promote quality landscape schemes, which are sensitive to the locality and provide local distinctiveness; and*
- 5. species chosen for landscape schemes should be native and of local provenance where possible.*

Developers will be expected to submit a landscape led masterplan to accompany all major development proposals and particularly those in sensitive locations, in the Green Gap. Landscaping schemes should seek to retain natural and seminatural habitats...”

2.6 The High Weald Management Plan

The High Weald Management Plan (2024 to 2029) sets out a Statement of Significance which identifies some of the key attributes of the designation. These are:

- “The High Weald is one of the best-preserved medieval landscapes in north-west Europe... despite its size and proximity to London, its landscape has remained relatively unchanged since the 14th century...”*
- “The natural beauty of the High Weald... is derived from the essentially rural and small-scale landscape character, rich in wildlife and cultural features...”*
- “The Management Plan articulates natural beauty through eight core character components which are rooted in the historic characterisation of the High Weald landscape as a whole (see character components set out below);*
- “Each core component of natural beauty is of equal and stand-alone importance in its own right, (i.e., they cannot be ranked) and any policy or action may be considered harmful to the AONB if it results in the loss of, or material harm to, any of these components of character”.*

The Core Character Components of the High Weald National Landscape are:

1. *“Natural Systems: a deeply incised, ridged and faulted landform of clays and sandstone...”*
2. *Settlement: dispersed historic settlement including high densities of isolated farmsteads, hamlets and late medieval villages...*
3. *Routeways: a dense network of historic routeways...*
4. *Woodland: an abundance of ancient woodland mostly in small holdings, highly interconnected with hedges and shaws.*
5. *Fieldsapes and heath: small, irregular and productive fields, bound by hedgerows and woods, and typically used for livestock grazing...”*
6. *Dark night skies: intrinsically dark at night...*
7. *Aesthetic and perceptual qualities ... including the notion of a quintessential English landscape, intimacy of scale, a sense of history and timelessness, rurality and tranquillity, glimpsed long views, freedom to explore and make connections with the natural world...*
8. *Land-based economy and rural living”.*

2.7 Battle Conservation Area Appraisal

As Plate BLC1 illustrates, the site is not within or immediately adjacent to the Battle conservation area. It is also notable that the Conservation Area Appraisal does not identify any views towards the conservation area, or from the conservation area towards the open countryside, that include the site.

It is, however, important to note that the appraisal recognises the distinctive ridgeline position of Battle, with the sloping nature of the countryside setting:

“The topography of the landscape surrounding Battle is important in creating its setting, with the open valley to the northeast and southwest of the town retained, heightening awareness of the town standing on the higher ridge, with no foreground development to detract”.

Similarly, the relationship between the Abbey and the former battlefield is also distinctive:

“The Abbey is situated on the crest of the south-facing ridge here, consequently the 54ha park slopes away to the south and south-west of the Abbey. It is laid to pasture, with the site of the Battlefield lying beneath the Abbey and the parkland immediately to its south. The character of the park is that of a largely open landscape with groupings of mainly deciduous trees. Towards the south-eastern boundary lies a historic series of linked ponds, thought to have originated as monastic stew ponds”.

2.8 High Weald Housing Design Guide

This design guide emphasises the importance of new housing developments responding to their site and landscape context:

“For development to reflect and enhance the character of the High Weald it must be designed to integrate into its setting. This means more than reflecting merely the visual appearance of the current setting, but includes understanding how the landscape and its settlements have evolved and why the area is the way it is today”.

Furthermore, the Design Guide notes that

“New housing development schemes must be influenced by a detailed understanding of the character and function of the landscape of the site and surrounding area, and the contribution features make to natural beauty and natural capital. This needs to be established in the earliest stage of site feasibility to inform the evolution of the site layout”

In particular, it is noted that landforms and water systems are key components of the High Weald landscape, and therefore topography should have a strong influence on the proposed pattern of development and the orientation of new streets.

Medieval field patterns are also a key characteristic, and these should also be retained where possible.

3.0 Landscape Context

3.1 Existing Landscape Character Assessments

On a regional scale the site and its wider context is classified as being part of National Character Area (NCA) 122, the High Weald. Characteristics of this character area which are of particular relevance to the site and include:

- *“a dispersed settlement pattern of hamlets and scattered farmsteads and medieval ridgetop villages”;*
- *“extensive broadleaved woodland cover with a very high proportion of ancient woodland”;*
- *Small and medium sized irregularly shaped fields enclosed by a network of hedgerows and wooded shaws, predominantly of medieval origin”.*

At a county scale the site is classified within the East Sussex landscape character assessment (2016) as being within LCA 10, Combe Haven Valley (see **Plate BLCIII**, below).

Key characteristics of this area which are particularly notable on site include the following:

- *Series of small, winding, High Wealden valleys;*
- *Intricate terrain of small winding valleys and ridges;*
- *Area enclosed by Battle ridge;*
- *Abundant woods and gills, extensive areas of Ancient Woodland;*
- *Heritage England registered 1066 battlefield and parkland on the northern edge;*
- *A sense of tranquillity away from the main settlements and roads.*

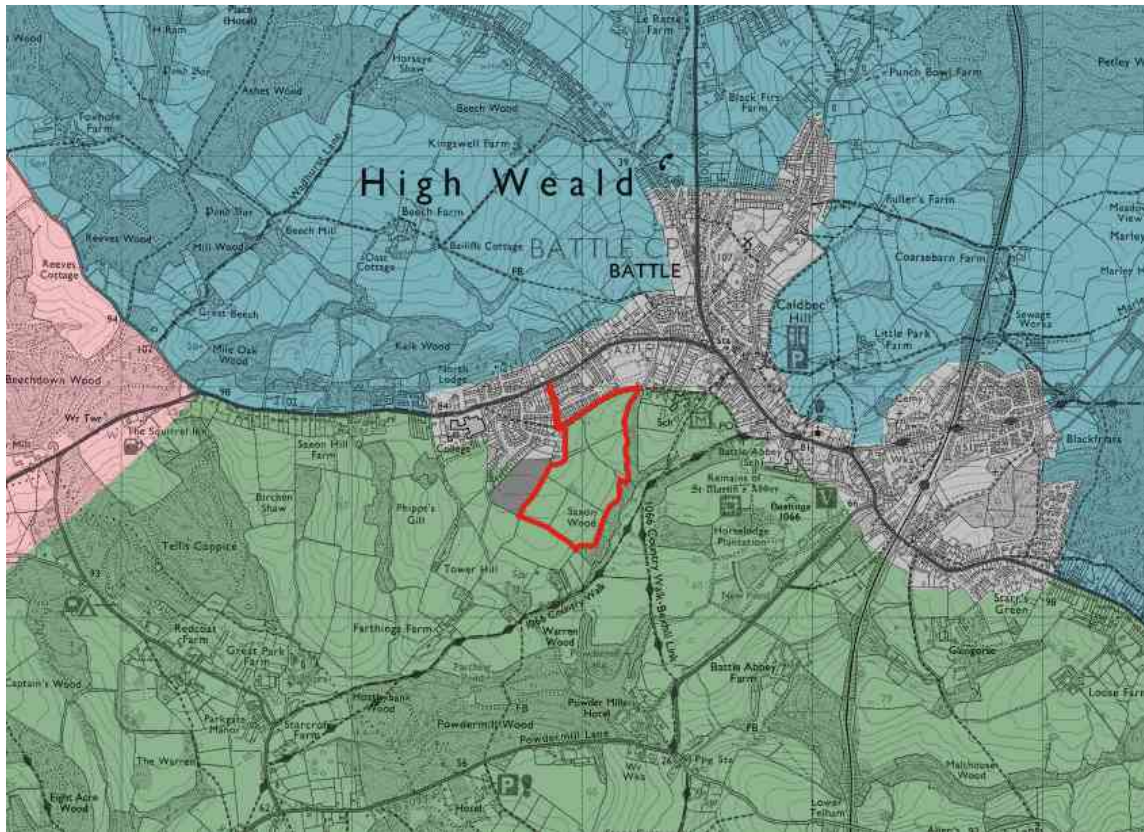


Plate BLCIII: Extract from drawing B-02 of the SLR Preliminary LVA. The site is located within Landscape Character Area 10, Combe Haven Valley (green area). LCA11 (Brede Valley) is the light blue area to the north of Battle.

3.2 Description of the Landscape Character of the Site and its Context

The settlement of Battle has a distinctive ridge top location, with the surrounding landscape sloping down from the settlement edge. The surrounding landscape is characterised by small scale, irregular pasture fields strongly enclosed by thick hedgerows and shaws, and these connect with mature woodlands (frequently Ancient Woodlands), which are often located in valleys or ghylls.

The site is located on the southern settlement edge of Battle, but is also adjacent to new housing on its western edge (the Field Way development). The site includes six enclosed, sloping fields, with thick hedgerow boundaries, and to the east is the ancient woodlands of Manser's Shaw and Saxon Wood. Beyond these woodlands lies the Registered Garden of the Battlefield.

As Plate **BLCIV**, below, illustrates, the nighttime landscape is influenced by lighting from the settlement edge, but the wider landscape is typified by dark skies and tranquillity.

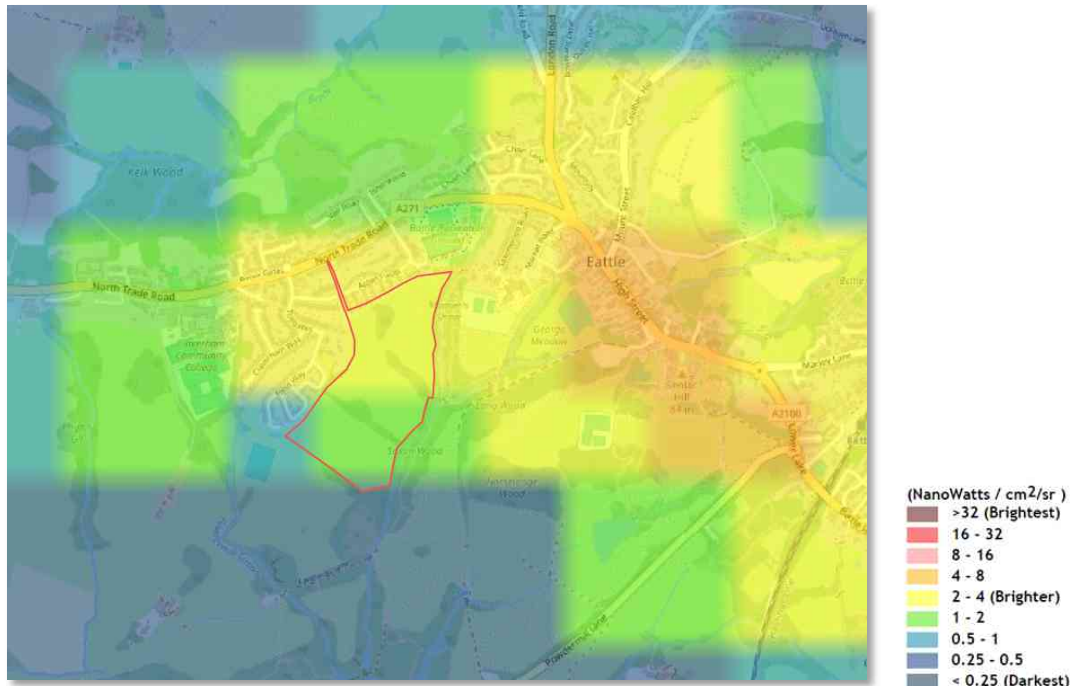


Plate BLCIV: Extract from the CPRE's Dark Skies Map showing the degree to which lighting influences the landscape in the locality of the site (the approximate boundary of the site is shown with a red line). These interactive maps were produced with satellite images captured at 1.30 am throughout September 2015. The detailed map illustrates the level of lighting across 9 colour bands, with reds, pinks, oranges and yellows denoting more urban areas, yellows and greens indicating suburban levels of lighting, and light to dark blues denoting dark skies. The site is within the yellow and green bands, which indicate settlement edge levels of light. The wider landscape is shown as blue and dark grey, which denotes dark skies.

Although the lower parts of the site are enclosed, there is some potential for long views from the upper parts of the site, with the north-western fields affording views of the Abbey Gatehouse.

Much of the site is not publicly accessible, with the exception of one public footpath along the settlement edge at the northern boundary of the site. The wider landscape can be accessed by a network of well-used regional trails and paths, including the 1066 Country Walk which passes through the Battlefield and to the east and south of the site.

In terms of landscape value, the inclusion of the site within the High Weald National Landscape and its generally distinctive characteristics and good condition means that it is of **national or high value** overall.

The largely rural character of the site also means that the fields are of high susceptibility to built development, with a small reduction in susceptibility in areas close to the settlement edges. The site as a whole is therefore of high sensitivity to the proposed development.

4.0 Potential Visibility of the Site, and Visual Receptors that have Potential to Obtain Views of Development

As the SLR LVA noted, the potential extent of visibility of residential development on the site would be defined by topography, existing built form, and vegetation in the form of strong hedgerows and mature woodland.

- To the north, a combination of existing houses and the higher terrain contain views, and there is therefore no potential for long views from this direction.
- To the east, views are largely contained by the shaw of ancient woodland which runs along the eastern edge of the site and is approximately 70 metres wide in the locality of the site. However, the higher parts of the site are visible from the top of the gatehouse at Battle Abbey (although notably this is not a viewpoint that is openly accessible to the public: it can be visited only at the weekend and visitors are charged an entry fee).
- To the south views are largely contained by a number of mature hedgerows, combined with the convex slope.
- To the west potential views of the site are contained by the existing vegetation and new housing on Field Way.

With the exception of long views from the top of the Abbey Gatehouse the visibility of residential development would therefore be largely localised. Within this Zone of Theoretical Visibility (ZTV) the following sensitive receptors will need to be respected in the proposed masterplan:

- **Walkers on the footpath at the northern edge of the site**, (for example Viewpoints 2 and 3 in the attached photosheets). These viewers currently experience open views over the fields and towards nearby woodlands and hedgerows, although walkers are already on the settlement edge and therefore also obtain views of built form.
- **Residents to the north and west of the site**, (for example viewpoints 1, 2, 3, 10 and 11 in the attached photosheets). Residents in these areas currently have filtered and/or glimpsed views towards the open countryside through nearby hedgerows. Built form on the settlement edge forms part of these views.
- **Battle Abbey Gatehouse**, (see viewpoint 7 in the attached photosheets). As drawing **BLC15** illustrates, whilst the gatehouse is not openly accessible to the public it affords panoramic views, with existing housing at Battle (including new housing to the west of the site) being clearly visible. New housing at the northern part of the site has the potential to be partly visible, but would be seen in the context of this existing housing, and the majority of these views would not change.

5.0 Design Principles

5.1 Introduction

The ReFormat illustrative masterplan (reference P20044-RFT-XX-XX-DR-A-0100) has been based upon a number of design principles which flow from the analysis in this report. These Principles are set out below, and are divided into **landscape and visual considerations**.

5.2 Design Principles based upon Landscape Character

5.2.1 Respecting Settlement Form and Setting in relation to Topography

Drawing BLC1 illustrates how the majority of Battle is located on the crest of ridges, with the dominant ridge orientated in a west-east direction. The majority of the settlement is positioned above 60m AOD, with the few areas that are below this elevation being shown in a darker brown. The new development on Field way, to the west of the site, also extends downwards to a minimum elevation of approximately 60m AOD.

Outside of the settlement, fields and woodlands slope away from the settlement edge to create a rural setting.

The proposed built form in the illustrative masterplan has been positioned so that new housing would be almost entirely located above the 60m contour. Below this contour fields would be left as open space and new woodlands. The distinctive settlement pattern and setting of Battle would thus be respected and maintained.

5.2.2 Reflecting Topography in the Grain of New Streets and Massing

Drawing BLC1 also illustrates the strong gradient across the site, demonstrated by the contours which sweep in a broadly south-west to north-east direction. The ReFormat illustrative masterplan also shows the existing contours.

The illustrative masterplan respects and reflects the grain of the existing topography by placing streets and massing parallel with the contours. Proposed buildings and their plots have also been orientated both to facilitate level changes and also to reflect underlying topography. Similarly building heights do not detract from the underlying topography; it is proposed that the majority of buildings would be up to two storeys tall, with only a small number of buildings at the north of the site reaching three storeys.

5.2.3 Preserving the Irregular and Small-Scale Field Pattern

Plate BLCI, above, and drawing BLC2 (the viewpoint location plan) both illustrate the pattern of irregular pasture fields defined by thick hedgerows which is typical of both the site context and the High Weald.

The illustrative masterplan proposes to retain the majority of these hedgerows, so that the distinctive pattern of the landscape can continue to be understood. This approach also retains these important linear habitats, which also continue to connect with nearby woodlands.

5.2.4 Conserving and Enhancing Woodlands

The existing Ancient Woodland to the east of the site forms a distinctive part of the landscape, and characteristically this is in a narrow, linear form that occupies a valley or ghyll.

The illustrative masterplan proposes that the Ancient Woodland would be protected with a broad area of new Public Open Space, and that new native woodland planting would be established along the eastern edge of the site to extend this habitat. In this

way an important habitat would be conserved, but the distinctive pattern of settlement on ridgelines, with woodland in ghylls, would also be respected.

5.2.5 Maintaining Darker Skies

As **Plate BLCIII**, above, illustrates, the site is not in an area of entirely dark skies, due to light from the adjacent settlement edge. However, the wider context is characteristically rural, remote and dark, and therefore reducing light spill from new development must be an important objective.

The proposals would seek to minimise light spill with an appropriate and agreed lighting design.

5.2.6 Providing Opportunities for Rural Recreation and Contact with Nature

As the High Weald Management Plan noted, one of the key characteristics of the National landscape is its aesthetic and perceptual qualities, such as feeling or remoteness and tranquillity and the *“freedom to explore and make connections with the natural world...”*

The illustrative proposals include significant areas of new POS to the south and east of the proposed new houses, which would include potential for the establishment of new habitats such as species-rich grassland and scrub, deciduous woodland, and new areas of wetland around SuDS. New footpath connections would also be provided, connecting with existing rights of way.

5.2.7 Providing Opportunities for Hedgerows and Trees in Streetscapes

Whilst the NPPF is clear that land must be used efficiently, it is also important in rural edge developments such as this to provide space for parks, verges, hedgerows and street trees. These features not only provide more attractive streetscapes, but also reduce the perception of density both within the site but also from locations around the edges of the site. Use of native planting in particular can also provide green infrastructure and wildlife corridors that pass through the site, connecting with existing hedgerows and woodlands outside of the site.

The illustrative masterplan includes not only green infrastructure at the site access and also on the edges of the site that are furthest from the existing settlement edges, but also space for native tree and hedgerow planting within streetscapes.

5.2.8 Proposed Densities Respect the Existing Gradient between the Town and its Rural Context

Net densities would decrease from 34 to 38 dwellings per hectare (dph) at the north and centre of the site, dropping to 29 dph in the parcel at the southern edge of the site. This gradient reinforces the traditional settlement form in the locality, focusing the majority of built form closest to the existing settlement, with areas further away being at the lowest possible density and allowing more space for pocket parks, greenways, landscape verges and street tree planting. Significant areas of proposed open space are then included to the south of the proposed new development parcels.

The illustrative masterplan reflects the existing gradient in densities between the town centre of Battle, its suburban areas, and areas on the countryside fringe. The overall proposed capacity of approximately 183 homes would respect the settlement edge position of the site, and the sensitive context of the National Landscape, by providing new homes within a context of significant new landscaping, street trees and open spaces.

5.2.9 Respecting Connections with Heritage Assets

Heritage assets form part of the distinctive character of the local landscape. The site is adjacent to Grade II Almonry Farmhouse, and there are also visual connections from parts of the site towards the Abbey Gatehouse, as well as footpath connections with the nearby Battlefield. Retaining and improving these connections maintains ensures that this aspect of landscape character is retained.

The illustrative masterplan provides an open space adjacent to Almonry Farmhouse which would respect the setting of this heritage asset. This open space would also provide a location from which to see the top of the Abbey gatehouse, providing a visual connection with this important building. The masterplan also provides opportunities for new footpath connections with existing rights of way, which could improve access to the Battlefield. Further details of how the proposals might interact with heritage assets in the locality have been provided in the Heritage Technical Note provided by Orion.

5.3 Design Principles based on Views

5.3.1 Respecting the Views of Walkers on the Footpath at the North of the Site

The footpath at the northern edge of the site currently provides open views over the fields of the site, and the proposed development has potential to result in significant visual effects for walkers. Some change in these views is inevitable, but it is important that the development does not “turn its back” on these viewers, and also that development does not appear overbearing in these views.

The illustrative masterplan provides a stand-off from the footpath to the edge of the new housing, and with the level changes in this location this means housing would be less dominant in views. There would also be sufficient space for some low landscaping on this edge, although it is not desirable to try to screen housing from this location. Instead, housing should front-on to the path to create an attractive, active edge.

5.3.2 Respecting the Views of Residents to the North and West

Residents are sensitive visual receptors, and their proximity to the site means that there is potential for some significant visual effects. However, these receptors are already separated from the site by existing hedgerows, and consequently views are largely screened or filtered, particularly in the summer months. Nevertheless, it is important that new development does not appear as overbearing or dominant in views.

The illustrative masterplan provides sufficient space for a stand-off and additional tree and shrub planting in order to provide scope for further screening of views from the north and west. Houses would be located on lower ground than existing houses on both of these edges, and consequently there is scope to avoid overbearing visual effects.

5.3.3 Retain Potential for Views from the Site to the Abbey Gatehouse (and Minimise the Potential Visual Effects on Viewers at the Gatehouse)

The north-western parts of the site currently provide long views towards the Abbey Gatehouse, which is visible above the canopy of the intervening woodland. Since the majority of the site is currently not publicly accessible, there is the potential to provide new publicly accessible viewpoints with views of this distinctive building.

The Gatehouse itself, whilst not freely accessible to the public (it is accessible for a small fee and only available at certain times of the week) is a popular viewpoint and provides attractive,

panoramic views. It is important that the proposed development does not significantly adversely affect these views.

The illustrative masterplan provides a new open space at the site access which provides an area from which new views of the Gatehouse could be obtained. This space would also help to reduce the visibility of new housing when viewed from the Gatehouse. In terms of the potential visual effects of the proposals on viewers at the gatehouse, only a small area of new housing would be visible from this perspective, and this would be seen in the context of existing homes to the west and north of the site, all of which are at higher elevations than the site. Consequently, the proposals would not introduce significant change to views from the Gatehouse.



Almonry Farm, Battle

Appendix 2 - Heritage Technical Note: Orion Consultants



Land at Almonry Farm, Battle Heritage Technical Note



Aims and Scope

1. This heritage technical note summarises the key archaeology and heritage considerations in relation to land at Almonry Farm, Battle. It includes a review of built heritage assets and a summary of archaeological assets relevant to the proposed development of the site. This technical note identifies archaeology and heritage assets with the potential to be impacted by the proposed development and considers the masterplan proposals and the mitigation to heritage assets

Location and Description

3. The study site is located to the south west of Battle and is accessed to the south of North Trade Road (A271). The study site occupies a series of enclosed arable fields with mature vegetation boundaries that lie on a south/south east facing slope.

Archaeology

4. An Historic Environment Desk Based Assessment (HEDBA) has been undertaken which has synthesised East Sussex HER records and Historic Landscape Characterisation data within a 1km radius of the site. This assessment has established that the site has a low potential to contain finds and features from all periods. Given the proximity of the study site to the registered battlefield, there is potential for the study site to contain finds relating to the Battle of Hastings (1066). The study site also has a known potential to contain medieval and post medieval agricultural features of local significance.
5. A future planning application will be supported by an updated supported by an updated HEDBA and a geophysical survey. The need and timing of any further archaeological works will depend on the results of the geophysical survey, the details of which can be agreed with the council at a later date.

Built Heritage

6. The following designated assets have the potential to be affected by the proposed development (Fig. 1).

Lower Almonry Farmhouse (grade II) and adjacent Oasthouse (non-designated)

7. Lower Almonry Farmhouse is a grade II listed building located immediately to the west of the north western part of the study site (Plate 1). The listing description states:

Three parallel ranges. Front range C18, others probably earlier. Two storeys. Two windows. Faced with weatherboarding. Tiled roof. Casement windows. Small gable in centre of south front. Doorway with flat hood on brackets and rectangular fanlight.



Plate 1 Lower Almonry Farmhouse from NW corner of study site

8. The significance of the farmhouse resides is in its architectural and historic interest related to its early date of the 18th century, with later additions, and is a good example of local vernacular architecture.
9. The Oasthouse is a non-designated heritage asset located to the south of Lower Almonry Farmhouse. The oasthouse is first recorded on the 1811 Almonry Farm Estate Map, as is Lower Almonry Farmhouse and therefore they are likely to be broadly cotemporary with each other. The significance of the oasthouse resides in its vernacular architectural and historic interest.



Plate 2 The Oasthouse from the NE

10. The proposed development site forms a secondary element of the setting of these two assets through visual links their historical functional association with each other (same historical ownership) and have a positive contribution to their significance. There is very limited intervisibility between the buildings and the fields to the east and south, except for the north western part of the field to the south of the oasthouse from where one or both of the buildings can be seen in some views through gaps in the hedge (Plate 3). The topography and intervening vegetation within the rest of the study site prevent intervisibility with the farmhouse and oasthouse (Plate 4).



Plate 3 View west toward Almonry Farmhouse and The Oasthouse from within the site



Plate 4 View north toward Almonry Farmhouse from southern area of the site

11. The proposed development will have no direct impacts on either building. The two buildings have a shared setting, and form part of each other's setting, comprising the gardens of both buildings and the garden of the house to its rear which separates the farmhouse from the oasthouse. The field on the east side of the farmhouse also forms part of the core of its setting. It is within these areas that the setting has a strong positive contribution to the significance of Lower Almonry Farmhouse.
12. The proposed development has been designed to ensure that the setting of the two buildings is intruded upon as little as possible. The field immediately to the east of Lower Almonry Farmhouse and The Oasthouse will be retained as open space. The access road into the development will come from the end of Tollgates and pass in between the farmhouse and oasthouse and cut south across the field to the east of the buildings and into the main development areas. The proposed areas of housing have been designed to use the topography so as to screen/filter as far as possible the from the views from the farmhouse and oasthouse. While the areas of proposed housing have been designed to utilise the topography of the site to not intrude visually into the setting, the site has a historical functional relationship with the listed farmhouse and the oasthouse, Therefore, although the visual effect of the proposed housing areas are limited, the proposed development will result in the loss of part of the farm's historical landholding. This is considered to be a less than substantial harmful effect.

The Gatehouse, Battle Abbey (grade I NHLE 1278698)

13. The Gatehouse, Battle Abbey is located c. 640m to the east of the nearest part of the study site. The top of the battlements of the Gatehouse are visible from the higher north western area of the study site and vice versa (Plates 4 & 5). The listing description states:

"Built in 1338 by Abbot Alan of Ketling. Stone. Pointed carriage archway and similar pedestrian archway with two storeys over. Ornamental arcading on first floor. Castellated parapet. Four octagonal turrets at the angles. The portion to the west of it forming the porters lodge is C12 and of two storeys. The portion to the east of the gateway was added in the C16 probably by Sir Anthony Browne on the site of the Almonry of the Abbey and was used as the court room of the manor of Battle till the C18. Two storeys.

Four windows. Two round-headed arches. At the north east corner is an arched buttress and an octagonal - turret behind it. Part of the Scheduled Ancient Monument.”

14. The significance of the Gatehouse resides in its architectural and historic interest. It is one of the best-preserved examples of a 14th century monastic gatehouse. As part of Battle Abbey, it has also been a key element in the development of both the Abbey itself and of the town. The Gatehouse dominates and is the focal point of the Market Place and is one of the most distinctive buildings in the town. The Gatehouse was built to impress and to demonstrate the wealth and power of the Abbey. The gatehouse tower is a prominent feature in the landscape and consequently glimpsed views of the top of the tower can be gained in many places within and around the town. These views are not designed views.
15. The top of the Gatehouse can be seen in the higher area of the north west area of the study site (Plate 5). The Gatehouse is obscured from view in most parts of the study site by a mixture of the woodland belt and topography to the east of the study site. Where the battlements can be seen, they form a small part of the view but is a noticeable feature. Plates 5 & 6 were taken in winter and so once in leaf, the intervening woodland belt will reduce the visibility, but not entirely remove, views of the top of the gatehouse. The higher part of the site is visible in the middle distance from the battlements of the Gatehouse (Plate 6). Consequently, the north western area of the study site is considered to be located within the setting of The gatehouse. However, its contribution to the significance of The Gatehouse is considered to be limited.

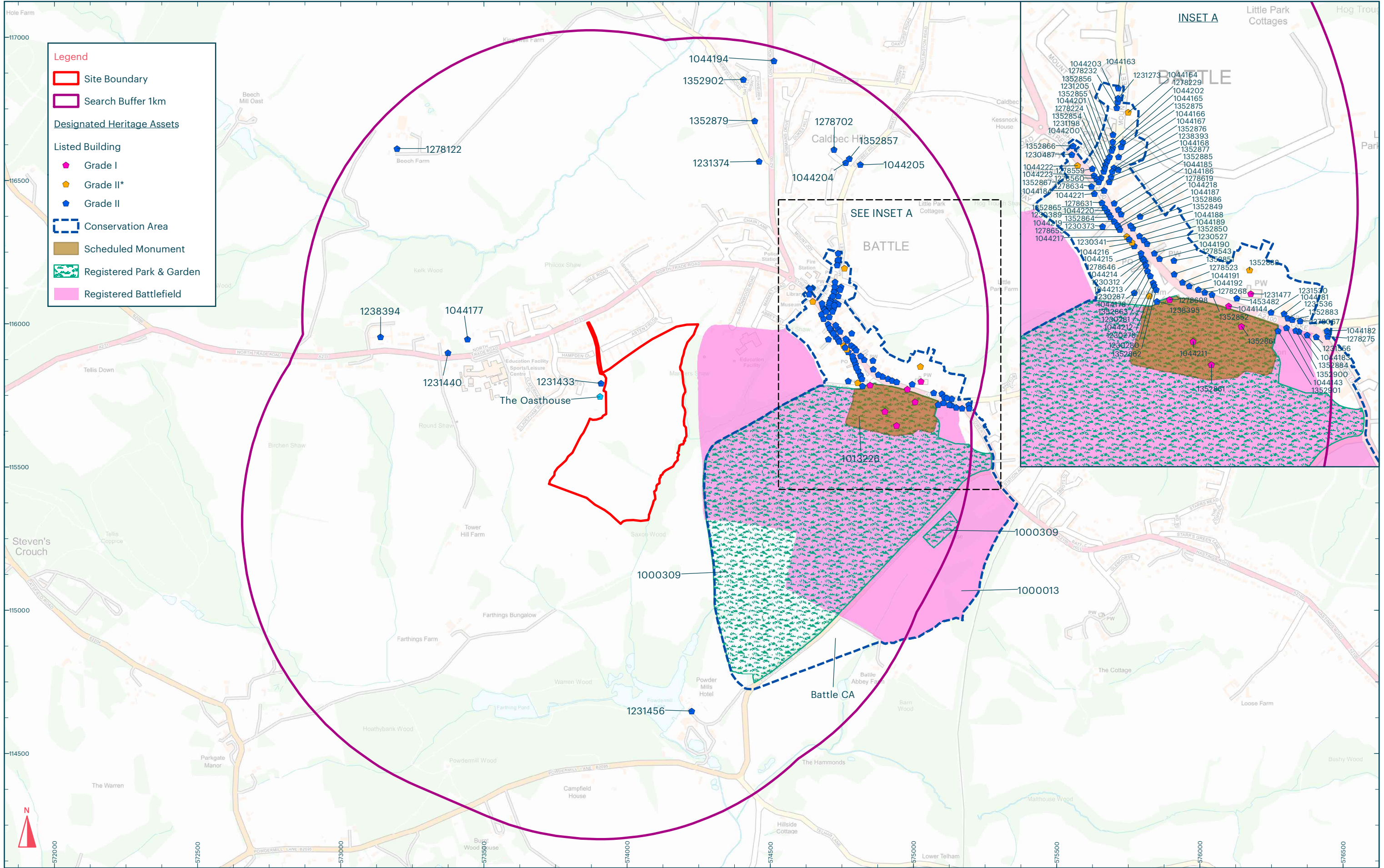


Plate 5 View East of the top of The Gatehouse from the north west area of the site



Plate 6 View west toward the proposed development site from the battlements of The Gatehouse (site area indicated by red arrows)

16. The view from the proposed development site toward The Gatehouse are not considered to contribute to the significance of the Gatehouse. However, they do enable the location of Battle Abbey to be appreciated, although the detail of the architecture is not possible to be appreciated from this distance. These views only have very limited access by the public at certain times. The views of the site from the battlements have a positive contribution to the significance of The Gatehouse. However, only a small part of the site that is visible is part of a much bigger vista within which housing to the south west of the oasthouse is also visible, along with part of the post WWII expansion area to the west of Conservation Area Battle.
17. The proposed development has been designed to limit the potential effect of the proposed development in the view from the roof of the Gatehouse view. The only element of the scheme that will be theoretically visible in the distance to the west is a small part of the access road and the roofs of a small part of the proposed development. This change will not have an adverse impact on the significance of the Gatehouse the setting of which will be almost entirely unchanged with only a limited part of the proposed development visible in the distance. This view already has later housing within it and the proposed development will be perceived as part of the existing housing in the view to the west from the top of the gatehouse.
18. There is no intervisibility between the proposed development and the various assets related to the Gatehouse (Battle of Hastings 1066 Registered Battlefield, Battle Abbey School Grade I, Ruins of Battle Abbey Grade I, Precinct Wall of Battle Abbey Grade I, Battle Abbey Scheduled Monument, Battle Abby Grade II Registered Park and Garden & Battle Conservation Area). Therefore, there will be no perceptible effects on the significance of these assets. A full assessment of these assets will be included in support of a future planning application.



Title:
Figure 1: Designated Heritage Assets & Conservation Areas
Address:
Land at Almonry Farm, Battle

Scale at A3: 1:12,000
0 400m



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Almonry Farm, Battle

**Appendix 3 - Letter from Secretary of State to Three Rivers Council and Hastings Borough Council
(February 2026)**





Ministry of Housing,
Communities &
Local Government

Matthew Pennycook MP
*Minister of State for Housing and
Planning*

**Ministry of Housing,
Communities &
Local Government**
4th Floor, Fry Building
2 Marsham Street
London SW1P 4DF

Cllr Stephen Giles-Medhurst OBE
Leader of Three Rivers District Council
Three Rivers House
Northway
Rickmansworth
WD3 1RL

By email only

5 February 2026

Dear Cllr Giles-Medhurst,

I am writing to you in advance of the commencement of the Three Rivers local plan Regulation 19 consultation scheduled for 6 February.

As I set out in my letter to you of 14 November, I expect Three Rivers to bring forward a plan that meets identified need as far as possible; that reflects national policy, including in relation to Green Belt release; and that is capable of being found sound at examination.

As it stands, your emerging plan proposes to meet only 56 per cent of the local housing needs identified by the standard method, leaving a shortfall of over 5,000 dwellings, with little explanation publicly available to justify this approach.

Section 20 of the Planning and Compulsory Purchase Act 2004 (the 2004 Act) requires local planning authorities to only submit a plan when they think it is ready for an independent examination. Your own committee report highlights a high risk that the plan may fail at examination due to the scale of the shortfall in meeting housing need. As a result, I have little confidence that your emerging plan is satisfactory and capable of being found sound or legally compliant at examination.

In light of this I have decided to exercise the Secretary of State's powers under section 21A of the Planning and Compulsory Purchase Act 2004 (the 2004 Act) (inserted by section 145(5) of the Housing and Planning Act 2016), to direct Three Rivers not to take any step in connection with the adoption of the Plan, while I consider whether to give a direction in relation to the Plan under section 21 of the 2004 Act. This direction will remain in force until I withdraw it or give a direction under section 21 of the 2004 Act in relation to the Plan. I will also be considering directions under section 27 of the 2004 Act should this be necessary to drive the delivery of a sound plan.

To support me in deciding whether to withdraw the holding direction or take further action, I request that you provide me with the full documentation you intend to publish for the Regulation 19 consultation. This should include, but not be limited to, the evidence base listed in paragraph

1.9 of your draft Regulation 19 Part 1 document. I would be grateful if you could provide this documentation by 19 February 2026.

I hope that you will engage constructively with my officials who will be in touch with your officers to take this work forward.

Yours sincerely,



MATTHEW PENNYCOOK MP
Minister of State for Housing and Planning



Ministry of Housing,
Communities &
Local Government

Matthew Pennycook MP

Minister of State for Housing and Planning

2 Marsham Street

London

SW1P 4DF

Cllr Stephen Giles-Medhurst OBE
Leader, Three Rivers District Council
Three Rivers House
Northway
Rickmansworth
WD3 1RL

18 March 2026

Dear Cllr Giles-Medhurst,

Thank you for providing me with the full body of evidence that underpins the Three Rivers draft plan. Having considered it carefully, I am writing to inform you that the Secretary of State is now directing the Three Rivers District Council ('the Council') in respect to its emerging local plan ('the plan').

In my letter to you of 14 November 2025, I made clear that I expect Three Rivers to bring forward a plan that meets identified need as far as possible; that reflects national policy, including in relation to Green Belt release; and that is capable of being found sound at examination.

In my subsequent letter of 5 February 2026, I reiterated my concern that your emerging plan was not satisfactory and my lack of confidence that it was capable of being found sound or legally compliant at examination. In that same letter, I notified you that as a result of my reservations, I was exercising my powers under section 21A of the Planning and Compulsory Purchase Act 2004 ('the 2004 Act'), to direct the Council not to take any step in connection with the adoption of the Plan, while I considered whether to give directions under section 21 and section 27 of the 2004 Act.

Having reviewed the draft plan alongside the additional evidence you provided, it is my considered opinion that the Regulation 19 draft plan approved for consultation at the Full Council vote on 27 January has not engaged sufficiently with the concerns I have conveyed to you.

As you will know, Section 21 of the 2004 Act provides the Secretary of State with intervention powers where they think that a local plan is unsatisfactory. Section 27 of that same Act provides the Secretary of State with broad default intervention powers where they believe a local planning authority is failing or omitting to do anything that it is necessary for them to do in connection with the preparation, revision or adoption of its Local Plan.

Local planning authorities are required to publish and maintain a Local Development Scheme (LDS), as set out in section 15(1) of the 2004 Act. Section 15(4) of the 2004 Act provides that the Secretary of State may direct changes to a local development scheme where they consider that

amendments are necessary to ensure that the authority's development plan documents fully and effectively cover the whole area.

It is my firm view that the available evidence demonstrates that the Council's Regulation 19 draft plan fails to propose allocating all appropriate housing sites available that could contribute towards meeting housing need. The Council are therefore proposing a plan which is highly likely to be found unsound at examination. On this basis, it is clear that the plan is unsatisfactory and that the Council is failing to do something necessary in respect of preparing the local plan. This meets the statutory test for intervention under section 21 and 27 of the 2004 Act

I have also considered the criteria laid out in the Planning Practice Guidance (PPG), which states that intervention under S27 of the 2004 Act "*should have regard to plan progress and local development needs*":

- **Plan Progress:** The current Three Rivers Local Plan, adopted in October 2011, is now almost 15 years old. It therefore stands as one of the oldest in the country and the policies it contains are likely to be significantly out of date. Progressing an unsatisfactory plan risks failure at examination and long delays until an up-to-date adopted plan is in place, with work having to restart in the new planning system. This would continue to leave the Council vulnerable to piecemeal and speculative development, with reduced public engagement and fewer guarantees that it will make the most of the area's potential.
- **Development needs:** The Council has consistently delivered below the target set by the standard method. The latest Housing Delivery Test (HDT) 2023 is the 5th lowest in the Country with a score of 30%, putting the LPA in the presumption in favour of sustainable development. This is unlikely to change without the adoption of an up-to-date Local Plan. The Council area is also one of the least affordable in the country, with an affordability ratio of 12.3 - meaning the median house price is 12.3 times the median annual earnings - compared with the England average of 7.7. There continues to be a significant need for additional social and affordable housing delivery in the area, which is unlikely to be met whilst the Council does not have an up to date local plan.

Taking all of the above into account, I consider that the intervention criteria are met, and that intervention is justified.

Pursuant to the powers in section 21 (1)(a) of the 2004 Act I am directing the Council to:

1. Per Section 21(1)(a): make modifications to your proposed Regulation 19 plan to include, as a minimum, the sites set out below lifting the requirement to approximately 85% of need:

- CFS26a Kings Langley Estate south
- CFS21 Land at Rousebarn Lane
- PCS4 East Green Street
- PCS47 South of Little Oxhey Lane
- NCFS12 Land East of Oxhey Lane
- NCFS6 Land to East of Watford Road
- Additionally, OSPF22 Batchworth Golf Course should lease issues be resolved

- 2. Per Section 21(1)(a): review and update the draft plan and evidence base in readiness for Regulation 19 consultation and Submission including where necessary in order to account for the additional sites.**

I previously gave a direction to the Council under section 21A of the 2004 Act, whilst I considered whether to make a direction under section 21 of the 2004 Act. The above direction under section 21(1)(a) supersedes the previous direction given under section 21A.

In addition, per section 27 of the 2004 Act I am directing the Council as follows:

- 3. Per Section 27(2)(b): Commence a revised Regulation 19 consultation by 31 July 2026 for a minimum period of 6 weeks;**
- 4. Per Section 27(3)(b): Submit your plan by 30 November 2026 with any proposed minor modifications necessary agreed by the Head of Planning Policy and the Director of Finance in consultation with the Lead Member on the Local Plan. Should proposed modifications be more significant this should be set out to the Secretary of State, allowing him to consider whether further action is necessary;**
- 5. Per section 27(2)(b): Not to take any step to withdraw the plan and report monthly (from the date of this letter) to my officials on the progress of the plan;**
- 6. Per Section 27(2)(b): Progress the plan up to the end of the examination process;**
- 7. Per Section 27(4)(b): On conclusion of the examination, to publish the Planning Inspector's recommendations and reasons; and**
- 8. Per Section 27(5)(b): On conclusion of the examination, to consider adopting the plan, including any main modifications recommended by the Planning Inspector deemed necessary to make the plan sound.**

Pursuant to section 27(8) of the 2004 Act, the Secretary of State has issued directions under section 27(2) and section 27(5) in order to ensure that, following the modifications required by direction under section 21(1)(a), the plan is afforded the best possible opportunity to undergo independent examination. The intention is to enable the Inspector to determine whether the modified plan is legally compliant and sound.

Finally, to avoid delays to plan making and ensure the plan is submitted for examination before the December 2026 deadline, per section 15(4) of the 2004 Act, I am also directing the Council to:

- 9. Per section 15(4) of the 2004 Act: Publish on your website a revised Local Development Scheme by 30 June 2026 to reflect directions set out above. For avoidance of doubt this should include the following milestones:**
 - Regulation 19 consultation to commence by no later than 31 July 2026
 - Submission of the plan for examination should be no later than 30 November 2026

The above directions will remain in force until withdrawn by the Secretary of State. Should you fail to comply with the directions in this letter, I will consider taking further action.

Notwithstanding this direction and the evidence you have already provided, I would like to give you an opportunity to set out by 25 March 2026 any exceptional circumstances which in your view suggest that intervention is not appropriate in this case. To be clear, this neither alters nor removes the direction set out in this letter.

I want to reiterate that I am committed to working constructively with you to ensure that Three Rivers can deliver the high-quality homes and essential infrastructure needed to underpin ambitious and sustainable growth. My officials will maintain ongoing engagement with your officers and will be in touch shortly to discuss next steps.

Yours sincerely,



MATTHEW PENNYCOOK MP
Minister of State for Housing and Planning



Ministry of Housing,
Communities &
Local Government

Matthew Pennycook MP
*Minister of State for Housing and
Planning*

**Ministry of Housing,
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4th Floor, Fry Building
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Cllr Glenn Haffenden
Leader of Hastings Borough Council
Muriel Matters House
Breeds Place
Hastings
East Sussex
TN34 3UY

Cllr Mark Etherington
Strategic Planning and Climate Adaptation Portfolio Holder
Muriel Matters House
Breeds Place
Hastings
East Sussex
TN34 3UY

13 February 2026

Dear Cllr Haffenden and Cllr Etherington,

As you know, this government is a firm advocate of a plan-led system. It is through local development plans that communities best shape decisions about how to deliver the housing and wider development that their area needs, and those plans must remain the cornerstone of our planning system. Without an up-to-date plan in place, there is a high likelihood that development will come forward on a piecemeal and speculative basis, with reduced public engagement and fewer guarantees that it will make the most of an area's potential.

In this context, I am concerned that your Regulation 18 draft plan, scheduled for consultation later this month, contains a minimum housing requirement of 175-187 dwellings per annum (dpa), a figure which represents less than 27% of the area's current Local Housing Need (LHN) of 697 dpa.

The National Planning Policy Framework (NPPF) sets a clear expectation that plans should be positively prepared – providing a strategy which, as a minimum, seeks to meet a Council's development need. This will be a key consideration for the independent Inspector in evaluating whether Hastings' local plan can be found 'sound'.

National planning guidance sets out the steps authorities should take if they cannot identify enough sites to meet needs. They should first revisit their assessments and assumptions about development potential of specific sites. If evidence shows that needs still cannot be met within

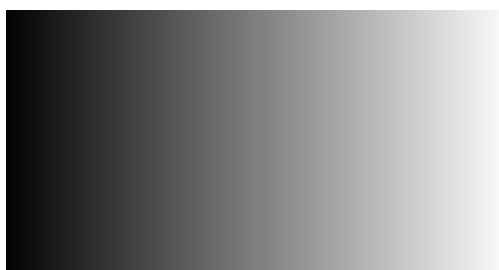
the area, authorities must work with neighbouring areas through statements of common ground to explore whether unmet needs can be accommodated elsewhere. If, after this process, needs remain unmet, the authority must clearly and robustly explain the reasons during the plan examination.

To ensure that Hastings Council has left no stone unturned in its efforts to identify land that is suitable for development, I have asked the Planning Inspectorate to hold an Advisory Visit with the Council over the coming weeks. The primary purpose of this meeting should be to examine whether the approach that the Council has taken to meeting its development needs is robust and capable of being found sound at examination.

Planning Advisory Service (PAS) is also able to offer support and advice on local plan progress. I understand that your officers are already engaging with PAS and I urge you to continue to do so should further support be beneficial in facilitating delivery of a sound plan.

I hope the Council will engage constructively with both further Advisory Visits and PAS support and I have instructed my officials to monitor the outcomes of these sessions and update me accordingly.

Yours sincerely,



MATTHEW PENNYCOOK MP
Minister of State for Housing and Planning



Almonry Farm, Battle

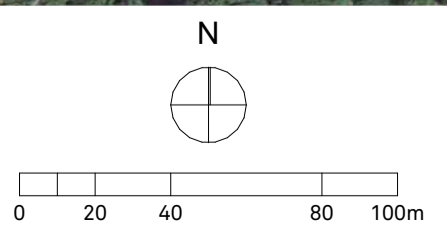
Appendix 4 - Concept Zoning Plan





- KEY**
- 1 Site access
 - 2 Potential connections to existing PRoW
 - 3 Public open space
 - 4 SuDS basins (shown indicatively)
 - 5 Area of new native woodland planting

rev.	date	changes description	status	issued by
P05	08/09/2025	Extent of developable area revised	SO	SM
P04	28/05/2025	Layout revised following receipt of topographic information	SO	SM
P03	12/11/2024		SO	



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drawn by
DM
checked by
MS

date created
Jul 2024
scale at A1
1:2000

project title
Battle
document title
Concept Masterplan

project	originator	volume	level	type	role	number
P20044	RFT	XX	XX	DR	A	0100
status	suitability description		revision			
SO	Initial Status		P05			



Almonry Farm, Battle

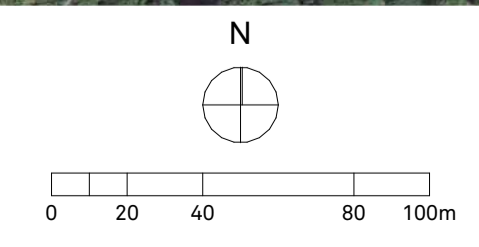
Appendix 5 - Concept Masterplan





- KEY**
- 1 Site access
 - 2 Potential connections to existing PRoW
 - 3 Public open space
 - 4 SuDS basins (shown indicatively)
 - 5 Area of new native woodland planting

rev.	date	changes description	status	issued by
P05	08/09/2025	Extent of developable area revised	SO	SM
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Battle
document title
Concept Masterplan

project	originator	volume	level	type	role	number
P20044	RFT	XX	XX	DR	A	0100
status	suitability description					revision
SO	Initial Status					P05