

27<sup>th</sup> November 2017

Cheryl Poole  
Programme Officer  
Rother District Council  
Town Hall  
Bexhill-on-Sea  
East Sussex  
TN39 3JX

Dear Cheryl

**Re: Salehurst & Robertsbridge Neighbourhood Plan  
Consultation on revised Strategic Environmental Assessment (SEA)**

These written representations are submitted by Hodson's Mill Limited (HML) in regard to the revised Strategic Environmental Assessment (SEA) published by the Parish Council for consultation between 1<sup>st</sup> and 28<sup>th</sup> November 2017.

We wish to confirm our support for the revised document and in particular, the methodology and conclusions of the updated assessment of potential development sites within Robertsbridge. However, there are a number of specific comments which we would like to formally place on record, as set out below.

**Section 6 – Site Assessment**

**Efficient use of land and natural resources**

Within the assessment of the Mill Site it is noted that 80% of the site falls within the development boundary. Our view is that Rother DC's definition of the existing development boundary is arbitrary and not reflective of the historical boundary of the Mill site. By way of demonstration, the matter has been assessed as part of the Salehurst and Robertsbridge Neighbourhood Plan process. The draft Plan proposes an extension of the existing development boundary to include the whole of the application site (including the northern element of the upper plateau).

This re-classification of the settlement boundary accords with Policy OSS2 (Settlement Boundary) of the Core Strategy, which identifies a need for boundaries to be reviewed in accordance with emerging local planning policy.

Furthermore, our view is that the site should not score negatively on the basis that its redevelopment would lead to "the loss of an industrial/commercial site". There is clear potential within the site to provide replacement commercial floorspace that will, in all likelihood, provide in excess of the number of employees previously based at the site during its last occupation over a decade ago. This is demonstrated by the current planning application which proposes 1,200 sqm of flexible commercial floorspace which could generate over 80 new jobs. It would be more appropriate, in our view, for the site to be assessed within the positive or neutral category.

**Improve access to services and facilities for all ages**

The Mill site scores negatively on the basis that the site entrance is situated approximately 550 metres from Robertsbridge village centre (classified as the junction between High Street/Station Road). As set out by the

Chartered Institute of Highways and Transport (CIHT) in 2000, residents within a community have a preference to walk no more than a maximum of 800 metres between their home and a town centre. Given that the 550 metre distance falls comfortably within this range, we do not consider that the site should be assessed in a negative manner.

It is noted that Grove Farm 1 site is situated approximately 300 metres from the village centre and scores positively in this regard. We do not agree that the Mill site should be scored within a different category given that the actual walking distances involved remain within the limit of what is considered comfortable for residents.

Furthermore, the site is of a sufficient size to deliver new local services as part of the overall development. This could include local retail and office space, which would be situated conveniently for occupiers of the new residential development on site.

### **Protect and enhance the high quality of the natural and built environment**

Our view is that the Mill site should not score negatively in regard to loss of ecological habitat. An Ecological Assessment was submitted in support of the current planning application which assessed the ecological interest of the Mill site, and where necessary, provided recommendations for mitigation measures and enhancement opportunities for habitats and wildlife.

The principles of a mitigation strategy for Dormouse have been scoped and agreed with Natural England – resulting in the inclusion of an area of retained mitigation planting within the west of the site. Furthermore, the larger areas of grassland where reptiles have been recorded are retained as part of the proposal, with open spaces to be designed and managed for this faunal group.

On this basis, it is clear that the site - by implementing the recommended mitigation measures – will not have a residual adverse impact on any protected species or designated sites of nature conservation interest.

We are also of the view that direct reference should be made to the restoration of the Oast House (as a Grade II listed building) within the positive commentary section of this category assessment of the Mill site.

### **Table 3 – SA Appraisal**

Within the seventh assessment criteria “To maintain and enhance the quality of landscapes, townscapes and the historic environment”, our view is that the Mill site should score within Category 1 as the opportunity to restore the Grade II listed Oast House and locally significant Mill Building will result in a significant positive impact.

Within the summary section on page 70, our view is that it would also be beneficial to note the potential of the Mill Site to deliver significant commercial and employment floorspace to the benefit of the local community (1,200 sqm proposed within the current application). This is a significant positive economic impact and should be taken into account within the SA appraisal, particularly given that no other potential site can contribute a similar amount of floorspace.

Whilst it is noted that Grove Farm 1 has the potential to deliver employment floorspace as part of the site proposals, this is likely to be a significantly lower amount as demonstrated by the current application proposals for 250 sqm of employment uses. The SA appraisal should acknowledge this difference within the text.

We look forward to receiving acknowledgment of receipt of these representations in due course.

Yours sincerely

**Hodson’s Mill Limited**