

From: richard@jandr32. [REDACTED]
Sent: 27 November 2017 14:57
To: Cheryl Poole
Subject: Robertsbridge Neighbourhood plan inquiry

Hi Cheryl.

I am sending you a series of emails with my comments and supporting documents and photos to be sent to Mr Slater. I don't think they will all go on one email, and some documents I have had to scan at work and send through to this email address, so they will come separately.

Thanks

Judith

Dear Mr Slater

Robertsbridge and Salehurst Neighbourhood Plan

I wish to add my support to this plan and the site chosen for housing within the village.

Robertsbridge has again been dealt a blow by Rother District Council in the requirement of 155 new houses, this despite the fact that it has already had over 300 new houses added since the 1980's.

I was dismayed to find at the hearing that you have the power to include sites into the allocation which were not part of what the village wanted. I was also dismayed that 2 developers for unsuccessful sites were allowed to 're-pitch' their sites in front of you, offering the 'moon and the stars' in order to get their sites included. This did not seem a fair system when villagers were not allowed to express their views in the same arena. During the Reg 16 consultation process, I for one, merely sent in a statement that I supported the neighbourhood plan with no further comments. It did what I wanted it to do i.e. it put development on the sites I wished to see development on and left site where I did not wish to see development. It seems that I was too naive against the professionals.

My views on each of the major sites chosen or not chosen are as follows and in some cases includes additional information which I believe was not disclosed to you as part of the hearing and which is necessary for you to make an informed decision:

The Mill Site:

- This is a large Brownfield site which therefore makes it compliant with the NPPF desire of using brownfield ahead of greenfield.
- It was the over-whelming choice of villagers to take development. The NPPF paragraph 183 states that neighbourhood planning 'gives communities direct power to develop a shared vision for their neighbourhood.....'. Not allowing development on this site would contradict this statement.
- The setting of the listed and curtilage listed building was increasingly industrial as the business of the mill changed being surrounded by a very dominant newer mill building clad in white, warehouses, and with articulated lorries going between the two buildings. The current proposal does not have vehicles passing through the listed area, and housing cannot be as imposing as warehouses and the mill building. I attach photographs which I hope will

give you an incite as to what the layout was like. Unfortunately I did not get a picture of the main warehouse situated next to the white mill building as this was sold and dismantled on the closure of the site.

- The buildings are in a state of disrepair due to vandalism, not necessarily by locals, the last people caught by the police were 18-20 year olds from Hastings. We use the fields to the north of the mill for agriculture, and the problem is so bad that we have not put sheep on the field for fear that they will be harmed in some way.
- The flooding in Robertsbridge comes from the River Rother and the Darwell Stream. The Rother is a tidal river. This confirmed in the Rother District Council DaSa Document for villages with allocations 15.89 states 'The main flood risk to Rye Harbour is from the tidal River Rother.' I do not think that the Environment Agency representatives at the public hearing into the plan were very strong with regard to this matter. Whist flooding can be bad when it happens, as soon as the tide turns to go out, the water starts to recede. The most notable recent event of this nature was a flood of station road which came and went within about 2 hours, where commuters in the evening found the footwells of their cars parked in station road full of water, but no sign as to how it got there.
- As part of their DaSa document, Rother District Council are promoting sites which wholly lie within flood zone 3 in fact all of the village lies within the flood zone. I understand that this is allowed where there are no other sites available, but surely this is a double standard? It is acceptable to leave people stranded in these houses, but not in houses in Robertsbridge? We appear to be being judged harshly on this matter.

Grove Farm:

- The subject of whether VL7 still exists as an existing allocation is still, it seems, open to discussion. However, the Local Plan 2006, policy DS6 part (iv) clearly states that 'the following sites will only be released (i.e. granted planning permission) if found necessary to meet the Structure Plan housing requirements up to 2011'
13.41 of the 2006 Local Plan states 'In view of the site's greenfield status and location within the AONB, the release of this site is subject to Policy DS6.
Rother District Council had the ability to change policy DS6 during the core strategy in 2014, but failed to take the opportunity to do so, merely copying it across as a 'saved' policy.
- As mentioned in the SEA document, the site does have a 24" water main crossing the site, but the SEA does not mention that there is a requirement for an 8m easement where no development or planting may take place. I attach a map which shows where this pipe runs. The present proposals puts this pipe under the main spine road of the development, and following on from the discussions at the hearing regarding accessing the mill site during flooding, it brought to my mind the issues surrounding what would happen when action is required on this pipe i.e. with cars trapped on the site, and movement around it being hampered. There is only one main road, and this is mostly a shared surface.
- In the northern 30% extension to this site, there is an underground mains electricity cable which would need to be relocated or the housing moved as it currently goes under the proposed housing. I attach a map showing this. It is in the right hand top corner near the wording 'Grove Farm recloser.....'.
- Policy VL7 allows for 0.9 hectares, all of the applications submitted for this site have used more land than that stated, the current applications are the worst using 1.33 hectares. On the main application, the site size is 0.91 hectares, but Turnberry are only proposing 24 dwellings, they are therefore seriously under delivering on what would be required under VL7. I attach a map which shows the size in hectares of the fields. TQ7323/8541= 0.29 hectares and TQ7323/8335 = 0.51 hectares. The whole of the farmyard cannot equal 0.1

hectares. An increase in site size of over 30 % to deliver this allocation must not be acceptable.

- Grove Farm forms a large part of the history of our village
1. The barn was listed on 30 September 2005, but the 2006 plan was never updated to include this. 13.40 of the local plan still states 'A survey of the farm buildings on site should be undertaken to establish if any are worthy of retention.'
 2. The conservation area was increased in 2009 to include the barn and part of the farmyard. The fields are included in the conservation area document 3.2 'Approaching the village from the south, from George Hill, the elevation of the land at this point gives the perspective of the village being hidden from view and sheltered by the surrounding ridges. One such ridge, running east to west, provides a dramatic and defining backdrop to the settlement. The land falls steeply away here, down into the High Street proper. The rear elevation of The George public house, protruding into the sight-line, is striking, with its mixture of bricks, tiles and roofscapes giving a sense of arrival into the historic core of the settlement.'
 3. There are many references to the farm in historical books of the village "In the early-mid 17th C. John Levets (Gent) caused considerable devastation within the town when he demolished 5 houses on the hill between the chapel and Kemsing Crossin order to form a consolidated farmstead called 'The Grove'.....the displaced tenants being housed in new dwellings or existing houses divided into separate tenements".
The remains of these houses were found during an initial dig carried out by Chris Butler on behalf of Croudace.
I attach a copy of this document which shows that human habitation on this site is present from the 12th century. This site can now trace its history from the 12 century to the present day uninterrupted.
I also attach an email from Casper Johnson confirming that the remains of the houses and the other finds have been included on the HER and are classed as non-designated heritage assets. I recall during the hearing that you placed great emphasis on the protection of non-designated heritage assets (the church/mission room).
 4. Further references to the historic nature of this farm can be found in 'The Sussex Extensive Urban Survey (EUS)' by Roland B Harris, the most important of which is 'The barn at Grove Farm is a rare survival of an agricultural building within the EUS study area, and is a four-bay timberframed and weatherboarded building of c.1700, with a wagon-door opening on to the northern side of the threshing bay. An 18th-century cart shed is attached to the rear. Historic boundaries are moderately well preserved'
 5. The High Weald AONB states'

resource to be considered as well as the visual impact. The statutory AONB Management Plan puts great emphasis on the material landscape resource and identifies the five key landscape components, all of which are present on or in close proximity to the application site:

- Geology, landform, water systems and climate – including the sloping landform of the application site;
- Settlement – including the character of historic settlements like Robertsbridge and farmsteads such as Grove Farm;
- Routeways – which include historic routes such as George Hill;
- Woodlands – not just protecting existing woodlands but also seeking opportunities to support their ongoing management; and
- Field and heath – including medieval fields such as the application site.

6. With such a history, surely this site should be given Green Space status as defined in paragraph 77 of the NPPF rather than being considered for development.
 - It is close to the community
 - it is of local significance due to its historical nature and its relevance to the overall history of Robertsbridge as a village (see references above)
 - it is local in character (see Conservation area references and High Weald AONB references), and it is not an extensive tract of land being approximately 0.8 hectares.

In fact this matches the criteria for Local green Space designation more fully than the site chosen for designation

- There is local need for this farm to be kept for agriculture.
1. The current tenant is one of 3 local large farming businesses who are performing a 'land-grab' of any available agricultural land each of them currently farms over 1000 acres, and it has been known for smaller tenants of short term agreements to be displaced.
 2. The current tenant already has 4 farmyards located around the village, and therefore another yard is not required, hence the unkempt state. Under the previous tenant, all of the buildings, yard and fields were in full agricultural use.
 3. The inclusion of the farmyard for development is in addition to the 0.9 allocation and would mean the death of the farm.
 4. A similar sized farm of 80 acres to the north of the village Bush Barn Farm was recently sold for £1.8m (this did include a house), so buying a farm is not an option for a small farmer of someone wishing to enter the industry.
 5. The soil on this site has been assessed as grade 2-3a i.e. the NPPF classes this as the best and most versatile agricultural land. The only exception is a strip close to George Hill (where the

historic remains are found) which is classed as 3c. This must account for the remains being left intact and left as permanent pasture.

6. The loss of the buildings would lead to this additional high quality farmland being made vulnerable to development and lost to agriculture.
 7. Rother has an agricultural college within its boundary, and therefore it would be thought that they would wish to support this. The NPPF (paragraph 28) and the Core Strategy (Rural area objectives (x) and policy RA2) both state that the agricultural industry should be supported
- The children at the primary school are in what must be a fairly unique position of being in daily contact with farm animals of which they do take an active interest. This must be seen as a positive for keeping the farm as a farm, but was not mentioned in the SEA.
 - The current ecology report shows that the barn, farmyard and field are used for feeding bats. The survey indicated that the site was 1 point away from having county significance.
 - I feel that it is necessary to tell you of the history of the ownership and tenancy of the farm to give you the complete picture.
 1. Exeter College were left the farm in the 1930's by Amelia Jackson, the wife of a former rector at the college. She in turn inherited the farm from her father.
 2. My grandfather came to the farm in 1944 as tenant and my father took over that tenancy in 1977 when my grandfather died.
 3. My father died in December 2013, and in a meeting with Savills (the agents for Exeter College) we were told that we would have to 'Jump through hoops of fire' (his exact words) to be considered for the tenancy as they wanted to break our family link to the farm. They were (in January 2014) already in advanced discussions with the current tenant.
 4. We ran a flock of 120 sheep and 20 cows, produced our own hay, straw and corn. Having worked with my father since being made redundant in 2004, I can assure you that all of the buildings were in full agricultural use at this point. The little cow shed made an excellent lambing shed having electricity, water supply and drainage and the barn was used as it had been used since its construction for the storage and preparation of feeds. The mill was also used to grind grain to be mixed and fed. The children in the primary school had a great interest in seeing the lambs fed, and in the health of the animals when one was ill. I would often be stopped in the village to provide an update.
 5. Exeter College had an increasing reluctance to spend money on the buildings, even though they had a legal requirement to upkeep the barn and cowshed. In fact they marked all of the buildings as redundant on the tenancy agreement so that they would not have to maintain or insure them.
 6. My partner and I still run 70 sheep. We are thankful to have found shared accommodation with other agricultural based business on the outskirts of the village, but we cannot expand further without a proper base and additional land.
 - Viability, whereas the Mill Site appears to have had their viability independently checked (I believe that is what was said at the hearing), this site has not. Croudace had viability issues which led them to try for an affordable housing total of 29% on 35 houses.

Knowing that on these current applications the developer will have to:

 1. Provide a lay area, skate ramp, bike course (although on the map these are incredibly small).
 2. Pay for a complete archaeological dig.
 3. Pay for a new sewer connection.

4. Pay for a new surface water drain (currently expected to connect to the Darwell stream).
5. Pay for any contamination identified to be removed from the site.
6. Pay for the conversion of the listed barn and cowshed.
7. Provide the correct amount of affordable housing.

The NPPF (paragraph 173) would appear to allow for affordable housing etc, to be dropped if they will not give the developer a reasonable return. Therefore, as a village, Robertsbridge may end up with none of the promises being up held and the development would be of no benefit to the village.

- At the Neighbourhood Plan Inquiry, the representative from Turnberry assured you that they had resubmitted plans to Rother regarding the detail of roofs etc, on houses and the garden sizes. The planning officer for this development has informed me that no such documentation has been received, and that he was unaware that there would be any additional documents.

Heathfield Gardens :

- Neither of the fields have been used for agriculture for over 25 years. In fact the east field was last used as a site office when the bypass was built.
- The combining of the two areas now makes a workable site
- Whilst on the edge of the village, it is on the edge of a similar large estate (Heathfield Gardens which was extended to 90 houses as part of the 300 since the 1980's)
- Heathfield Gardens is now a mixed private and council estate as will be this new development.
- As the development does not take up all of the 2 fields, and is limited to that nearest to Heathfield Gardens, it is hoped that any wildlife may be relocated to the southern end of the site not to be developed as the habitat must be similar. Perhaps it could be agreed in advance that the rest of these fields could become a kind of conservation area?

Bishops Lane:

- Has only intermittently been used for cereal crops in recent years.
- My father was probably the last farmer to use this land properly for agriculture, unfortunately this led to bales being rolled into the river, sheep being chased and ending up with a broken leg and the hay rack being set on fire on more than one occasion.

Vicarage:

- Already within the development boundary.
- The new wider access may actually make it easier for cars to pass in either direction in Fair Lane.
- Will make better use of a space within the village.

As a member of the farming community, I find it hard to understand how it can be considered to take a whole farm of high quality land out of production for housing when there are fields which have not been viably used for years. It is sad that we have to lose any of our fields, but the previous 300 houses took care of the other brownfield sites in the village as well as trespassing on to greenfields.

No where in our village is far from the shops, station, buses etc. when compared to the distances in a town and therefore distance to the facilities for any of the sites should not be an issue.

Yours sincerely
Judith Rogers

**** ATTACHMENTS SUPPLIED SEPARATELY ****

Second email received within consultation deadline:

From: richard@jandr32 [REDACTED]
Sent: 28 November 2017 16:47
To: Cheryl Poole
Subject: RE: Robertsbridge Neighbourhood plan inquiry

Hi Cheryl

Some of my comments relate directly to the SEA, i.e. the water main and easement and maps but I just haven't linked them by number.

If I can qualify a bit now.

Comments made regarding the history of Grove Farm fall under the category of Protect and enhance the high quality of the natural and built environment.

Comments regarding bats at Grove Farm and wild life at Heathfield Gardens fall under the category Conserve and enhance biodiversity and geodiversity.

Comments regarding soil quality fall under the category of Efficient use of land and natural resources.

Comments regarding flooding fall under the category of Minimise the risk of flooding and detriment to people and properties.

Comments regarding the water main and electric cable at Grove Farm falls under the category of Efficient use of land and natural resources.

Comments regarding the distance from services (all sites) falls under the category of Improve access to services and facilities for all ages.

Other details regarding Grove Farm I felt had to be said, as Mr Slater appears to have the power to add this site to the allocations, but he has not had the full facts before him, and I felt that he should in order to make an informed decision.

Please add this email to my previous ones for submission.

Thanks

Judith