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SALEHURST & ROBERTSBRIDGE NEIGHBOURHOOD DEVELOPMENT PLAN
December 2016

Examination by Mr Slater held at a Public Hearing on 28th September 2017

Question 6

If I were to conclude that the Mill Site allocation did not meet basic conditions in terms of it being sustainable development and the conflict with flood policy, how should I deal with the question of delivering the house that need to be built? Should I seek to introduce other sites in the plan area and in which case which ones? What are the implications for taking the plan forward?

Responses prepared by Courtley Planning Consultants Ltd on behalf of Devine Homes. September 2017

Question 6:

6.1 Policy HOU2 should be expressed as “*a minimum of 155 units*” the Parish Council have indicated that it is prepared to accept this revision. RDC also acknowledge that it currently cannot achieve a 5 year housing supply as measured against its development plan that is compliant with the NPPF.

6.2 The Mill Site has significant constraints over and above that of flooding. The site is exposed to significant views into and out of the AONB and the scale of development proposed is likely to impact upon the setting of the conservation area and its listed buildings. These issues are expressed by past appeal decisions.

6.3 In addition to issues of flooding, the screening opinion received from RDC state that the SRNP needs to consider a number of locally important environmental factors including the AONB; the significant heritage constraints, including two conservation areas, a significant number of listed buildings and archaeological notifications areas. The Rother & Darwell Valleys are also identified as a Biodiversity Opportunity Area (BOA) which overlaps sites under consideration for development. There are also numerous records of protected, BAP Priority Habitants along the Flood plain.

6.4 We have made representations on the SRNP SEA both in terms of its timing, unbalanced and skewed assessment of the individual sites and its failure to obtain or review evidence relating to Landscape and visual impact of varying sites. The SEA process has led to a flawed recommendation of the Mill Site as a suitable housing allocation. Against pretty much all SEA objectives the Bishop Lane site when properly assessed comes out highly suitable and sustainable as a housing site. This is supported in our planning, highway, flood risk and landscape evidence submitted to Parish Council over the SRNP process.

6.5 One of the objectives of the SRNP is “*To protect and enhance local open spaces and access to the Countryside*”. With the allocation of the Bishop Lane site the Council will be able to deliver on this objective. It has always been proposed that part of the site would provide 1.5 hectares of public green open space including a riverside green corridor walk, play area and possible allotments. This objective is supported in the RDC Green Infrastructure Study 2011 (para 4.2.43 to 4.2.45); the Open space, Sport & Recreation Study 2006 where *AGS 1 states “The Council to consider new long term provision west Robertsbridge”* for Amenity Green Space. Provision of this green open space would also meet the Green Corridor objective set in Section 13 of the same study.

6.6 Our representations made on behalf of Devine Homes on the SRNP pre-submission in October 2016 is set out on pages 8-12. This provides a clear justification for the allocation of this site for 48 dwellings (40% affordable) and a new area of public local green space (1.5 hec) which would deliver a riverside walk a play area and also provide an increased habitat area delivering a green corridor for improved species movement.

6.7 We recommend Land at Bishops Lane, Robertsbridge be allocated as housing allocation in the SRNP with policy guidance as set out above. (See attached illustrative layout)