



landscape architecture ■ urban design
expert witness ■ environmental planning

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**LANDSCAPE AND VISUAL COMMENTRY
ON
POTENTIAL HOUSING SITE RB1
AT
ROBERTSBRIDGE, EAST SUSSEX**

on behalf of

DEVINE HOMES PLC

September 2013

ROTHER DISTRICT COUNCIL SHLAA (REVIEW) 2013

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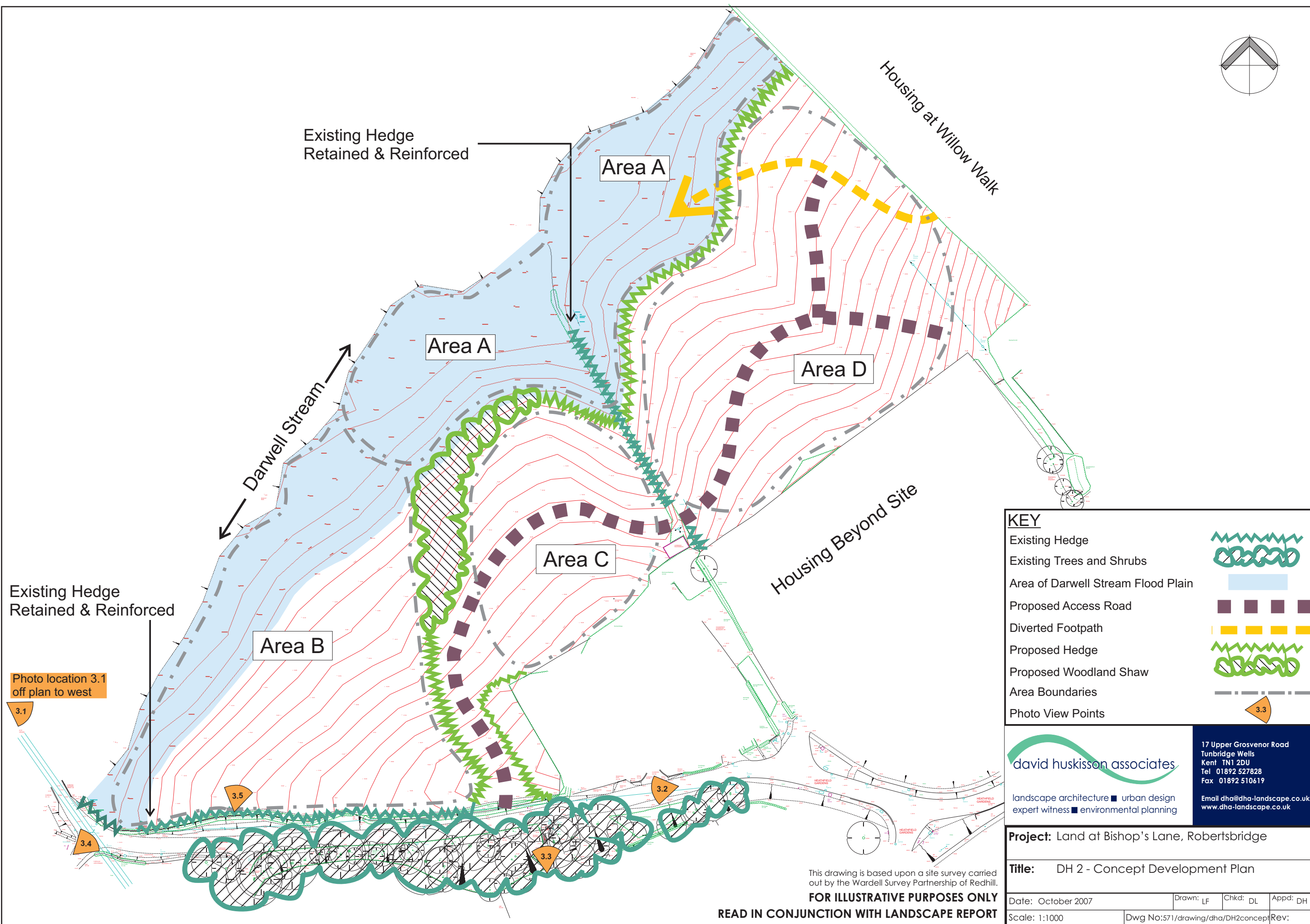
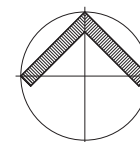
- 1 David Huskisson Associates (DHA) is a firm of Chartered Landscape Architects, established in 1987 and registered since then with the Landscape Institute. DHA has been a member of the Institute of Environmental Management and Assessment since 1992. The practice is Quality Assured to BS ISO 9001:2008. All DHA's directors are Chartered Members of the Landscape Institute.
- 2 DHA have been retained by Devine Homes plc since 2005 to assist in the promotion of their potential housing site at Robertsbridge, known as site RB1, Land off Bishop's Lane, first by representation to the Rother Local Plan Inquiry in 2005 and subsequently seeking an allocation in the Local Development Framework in 2007.
- 3 It is notable that in 2005, the Local Plan Inspector concluded that the land now referenced in the SHLAA as RB1 was less intrusive than the policy VL6 site extension (now VL7 in the adopted Rother Local Plan and essentially the same as RB2). His conclusion was ignored.
- 4 RDC included VL7 together with a stringent mitigation requirement and gave strong justification for not taking further adjacent land. However the subsequent selected sites in the 2010 SHLAA's which included RB4, RB5, RB7 and RB13 ran wholly counter to the reasoned justification given by RDC in connection with limiting site VL7 (RB2).
- 5 In 2007 DHA's landscape submission in relation to the Local Development Framework included plan DHA2. This plan showed an indicative development concept for the site (**DHA2**) which clearly identified the landscape strategy to be applied, the retention of on site features and the creation of a streamside open meadow area. The plan was subsequently supported by an indicative layout in January 2008, plan number 01030/SK01. Both these plans are now resubmitted with this statement.
- 6 In 2010 DHA prepared a comparative landscape and visual assessment of several sites at Robertsbridge, East Sussex. The sites had been identified as being potentially suitable for housing development in the Strategic Housing Land Availability Assessment (SHLAA) (March 2010) prepared by Rother District Council (RDC) as part of their Local Development Framework (LDF).
- 7 DHA's assessment contained a considered evaluation of those sites against the land in the control of Devine Homes (RB1) which had been shown as excluded as a potential site for housing. The assessment drew on the earlier work carried out since 2005, an updated desk top study, a consideration of the ESCC Market Towns and Villages Landscape Assessment Capacity Study prepared on behalf of RDC by ESCC in 2009 and an updated site evaluation.

- 8 RDC have now published their updated SHLAA, 2013 Review. Site RB1 has again been excluded.
- 9 In common with all other sites identified in the SHLAA at Robertsbridge, site RB1 lies within the High Weald Area of Outstanding Natural Beauty (AONB).
- 10 In Section, 11 the National Planning Policy Framework (March 2012) (NPPF) deals with conserving and enhancing the natural environment noting at paragraph 109 that the planning system should contribute to and enhance the natural and local environment by *"protecting and enhancing valued landscapes"*. The importance of statutorily designated landscape at the national level is reaffirmed in paragraph 115 of the NPPF which confirms that *"great weight should be given to conserving landscape and scenic beauty in.....Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty"*.
- 11 DHA's 2010 assessment found that in landscape and visual terms site RB1 compared more favourably than sites RB2, RB4, RB5, RB7 and RB13 and that it appeared to have been ruled out for no very clear or well justified reason. The report concluded that given that all the sites lie in the nationally important AONB, only sites that do least damage to this interest of acknowledged importance, and which best respect the setting of the settlement, should be selected for further consideration.
- 12 There is no detailed evidence referenced in the SHLAA Review 2013 to indicate that any further independent landscape evaluation has been undertaken by RDC of site RB1, or any other sites. A comment is made that in some instances RDC re-consulted ESCC on landscape issues, though it is not clear what sites this comment relates to. No updated or more recent landscape evidence is lodged on the online evidence base after the 2009 Landscape Capacity Study.
- 13 The following summary table has been prepared to show the evolution of the SHLAA inventory from 2010 to 2013 with regard to site RB1. Comments have been made in the third column seeking to redress what are considered to be some unbalanced or over simplified summaries in the SHLAA 2013 review.

| SHLAA (MARCH 2010) (Text from Sites Appendix iii: Sites Excluded following On-Site Appraisal) | SHLAA 2013 Review (Text from Part 2 Settlement Maps and Tables) | DHA Comment |
|--|---|---|
| <p>Two discrete sections worthy of further investigation.</p> <p>(i) Eastern corner and (ii) Frontage development on Bishops Lane. Whilst these are suitable in many ways there is not a reasonable prospect of the site coming forward. ESCC Highways advice suggest site can only be accessed via third party land through Willow Bank. Given the plot sizes at Willow Bank this would probably require the loss of more than one dwelling and there is no clear prospect that these would come forward. Also given the likely scale of development, viability remains an issue given the existence of this third party 'ransom strip'. Findings of ESCC Landscape Study suggest land east of the village would be preferable for development.</p> | <p>Not suitable and not a preferred site, with the balance of considerations weighing against it.</p> | <p>No clear justification given on how the balance has been struck. Land at the east of the village was shown to be more widely visible in the AONB than RB1 which is set in the valley floor.</p> |
| | <p>The Valley of the Darwell Stream which runs through the centre of the village and the area separates the older part of the village from the more modern part developed near the railway. It is accessible meadows forming valued and locally important green infrastructure and is a key feature of the character of the village, being the backdrop to rural views from the village centre. Its erosion would diminish Robertsbridge's locally distinctive character of the village, and would not be an appropriate response to local context.</p> | <p>The public footpath does not permit access "to the meadows" without trespassing. Allocation would secure and dedicate access for the long term. The locally distinctive character was considered in the DHA 2010 report which noted the valley was less enclosed south of Station Road with views out from the road corridor above the bund of the flood protection and through the intervening vegetation. It was acknowledged that there are viewpoints to RB1 from the western half of Robertsbridge and the low lying Station Road and from properties adjacent to the site. Housing on Bishop's Lane and at Heatherview Gardens is seen in some of these views. This rather stark urban edge could be softened as indicated by the supporting illustrative layout, with development being set lower than the existing and thus be less prominent in views across the valley. It is considered that this would be an appropriate response to the local context. There are no views from the historic</p> |

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| | | village high street and conservation area and no views from one of the main approaches into the settlement down George Hill. |
| | Net developable area is restricted by flood plain on northern side. | This has always been acknowledged and indicated on the supporting illustrative material and the 2007 submissions. It was not considered a constraint in 2010. The floodplain would be safeguarded within any allocation and, as a consequence, would ensure the delivery of an open and accessible meadowland area adjacent to the Darwell Stream as noted above. |
| | There is a public footpath the length of the developable area. | It was not considered a constraint in 2010. The intention has always been to divert the path through the riverside meadow land. This was part of the submissions made in 2007 and 2010. |
| | ESCC Highways advice suggest site could potentially be accessed from the south west corner adjacent to Bishops Lane, but only following extensive highways works, including an extension of the 30 mph zone to contain the vehicular access and appropriate road widening works to provide footway connection. | The works to the highway were demonstrated by a detailed plan and would be relatively modest and contained but some change in character would result. The effects were described in the 2007 submission. |
| | Appropriateness of road widening and works at this point would impact on the area's rural character and tranquillity on a road defined by the High Weald AONB as a historic routeway. HW AONB objectives 'To maintain the historic pattern and features of routeways' and 'promote the reduction of the impact of intrusive highway engineering' may be compromised. | Whilst Bishop's Lane does exhibit some of the characteristics of High Weald historic routeways it is hardly typical. It lies at the urban edge and is influenced by it. It is already flanked by urban development to part of its southern side at Heathfield Gardens, south of the site, whilst its western end is similarly at the urban edge being flanked by the Mill Rise development. Tranquillity is already affected, not least by the railway that crosses the lane on embankment further eroding the character. |
| | The site itself is also sub-divided by a High Weald AONB historic field boundary, which would be lost as part of any development. | The presence of the hedgerow was tacitly recognised in the SHLAA 2010 entry where the site is described in two parts. Similarly its presence has been recorded in the DHA reports and its retention has been shown on the illustrative plans. |

- 14 It is considered that the 2013 SHLAA review does not contain any information that has not already been considered in the earlier submissions or is fundamentally new.
- 15 Site RB1 has seemingly been ruled out of the preferred sites in the 2013 SHLAA Review for no clear and well justified reasons. Rother District Council have not provided any new evidence to demonstrate what their decision has been based upon.
- 16 Many of the issues raised in the 2013 SHLAA were substantively addressed in the 2007 development concept plan.
- 17 Site RB1 is a site that is well located relative to the existing settlement pattern, is less intrusive than other sites being set lower in the landscape, below and partly masked by existing flanking development. It would also deliver a valuable public amenity area in the stream side meadow. It is considered to be a site that merits allocation.



KEY

Existing Hedge

Existing Trees and Shrubs

Area of Darwell Stream Flood Plain

Proposed Access Road

Diverted Footpath

Proposed Hedge

Proposed Woodland Shaw

Area Boundaries

Photo View Points



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Project: Land at Bishop's Lane, Robertsbridge

Title: DH 2 - Concept Development Plan

Date: October 2007

Drawn: LF

Chkd: DL

Appd: DH

Scale: 1:1000

Dwg No:571/drawing/dha/DH2concept/Rev:



| extended DESIGNS | | | |
|------------------|----|----|----|
| Residential | 11 | 11 | 11 |
| Location | 11 | 11 | 11 |
| 1111 1111 | 11 | 11 | 11 |
| Client | | | |
| DEVILLE HOMES | | | |
| Project | | | |
| BISHOPS LANE | 11 | 11 | 11 |
| KINGSBURY LANE | 11 | 11 | 11 |
| 1111 1111 | 11 | 11 | 11 |
| Drawing Title | | | |
| INDICATIVE | | | |
| SITE LAYOUT | | | |
| Drawing Number | | | |
| 01030/01031 | | | |