

Submission Battle Neighbourhood Plan Summary of Representations

| Respondent Details | | | Agent Details | | Part of Neighbourhood Plan | | Summary of Comments | Participate in oral exam | Notify when NP made |
|--------------------|--|------------------------------|---------------|------------------------------|----------------------------|--------------------------|---|--------------------------|---------------------|
| Reference | Respondent Name | Organisation (if applicable) | Agent Name | Organisation (if applicable) | Item | Support/ Object/ Comment | | | |
| BCPNP/R16/2020/1 | Caryl Victoria Cook | | | | Whole plan | Support & Comment | I fully support the plan particularly intentions to include social and affordable housing, and the inclusion of green spaces. I would like to see the retention of 6-8 historic parking spaces at the top of Caldbeck Hill for residents, which deter excessive on street parking towards Whatlington, aggravating traffic flow and causing pollution. I applaud the attention to environmental concerns and the attention to the town's heritage. | Y | Y |
| BCPNP/R16/2020/2 | Cllr Vikki Cook on behalf of ward member | | | | Whole plan | Comment | On behalf of a ward member, to represent concerns over car parking at the top of Caldbeck Hill. Residents who live at the top of the hill have been permitted to use the green space to park their cars for many years, and will police and maintain the area to ensure ad hoc parking does not start. I support the Plan. | N | Y |
| BCPNP/R16/2020/3 | Carol Harris | Battle Town Council | | | Whole plan | Comment | <p>BTC Minutes of January 11th:</p> <p>HD2 Site Allocations We would agree with the reduction in the allocation of dwellings on BA32a from "up to 20" down to "up to 15" as long as this does not impact on the ability to meet the currently published outstanding residual housing targets.</p> <p>HD3 Housing mix We agree with the amendment to exclude the reference to the sole use of flats for affordable housing.</p> <p>HD9 Town Centre Boundary We agree that the term Town Centre should be used consistently instead of 'main shopping area'. To clarify the last sentence of the policy we propose deleting the reference to Small Scale Dwellings so that the last paragraph reads "New housing developments will not be supported within the defined Town Centre Boundary. However, those situated behind the High Street frontages will be considered if they conform to Battle CP Design Guidelines and the High Weald Housing Design Guide." We also propose adding the following text to section 5.1.9 Policy Intent, Paragraph 3. Add a second sentence: "As a result, the conversion of retail to dwellings at ground level will be resisted." We agree with the proposal from RDC to delete the reference to "amalgamation" and add the following text to the Policy Intent, paragraph 3, as a third sentence: "It is the intention to discourage wherever possible the amalgamation of small adjoined retail outlets into larger ones with a single large frontage, as this will detract from the current street scene."</p> <p>IN2 Maintain and Improve Existing Infrastructure We are content with the policy remaining as is, due to its protective nature.</p> <p>IN3 Parking and New Development we are content with the policy remaining as is because of the local needs with regard to traffic volumes and requirement to follow DG6 of the High</p> <p>IN4 Pedestrian Provision and Safety If necessary to amend, we agree with this small rewording. Weald Housing Design Guide, which has been adopted by RDC.</p> <p>Policy EN3: The High Weald AONB and Countryside Protection We wish this policy to remain as worded in the Submission document because the suggested amendments undermine the protections afforded by the policy.</p> <p>ET1 Tourism and Local Economy We agree to amend "Bannatyne Spa and Health Club" to "Bannatyne Spa Hotel"</p> <p>ET2 Sustaining Local Retail and Encouraging Employment Opportunities This policy was introduced after Regulation 14 at the behest of RDC and was not a response to the consultation statements made by them. Employment sites were not allocated because they were not subject to the Regulation 14 public consultation. The steering group had no basis for developing selection criteria and as a result has simply listed site offers and was unable to make any further recommendations. The latest locally derived evidence does not support that viewpoint, which is based on a 14-year-old policy. It is our view that the RDC viewpoint which clings to the 2006 Local Plan has demonstrably been overrun by current circumstances and it is no longer appropriate for the Battle NP to cite the latter for the purpose of determining local Battle employment/retail opportunities. BTC contend that the two care home sites still constitute valid employment opportunity and more than meet the requirement for employment space, we note that this view has not been challenged in the Cabinet report.</p> <p>ET3 Developer Contributions Agreed that this policy can be removed.</p> <p>ET4 Protection of Community Assets it is acknowledged that the process of establishing an Asset of Community Value is not a planning matter but once a property is registered, it is a planning matter and we wish to cover the totality of the processes.</p> <p>ET5 Community Leisure and Cultural Facilities An additional sentence was added to the Regulation 15 document to address comments from RDC as follows: "The continued investment in the community facilities of the Civil Parish, which will include the use of CIL receipts to upgrade and maintain these where appropriate to meet the identified needs of the community will be supported."</p> | Y | Y |
| | | | | | | | Battle Civil Parish Design Guidelines We can see the benefit of much in the proposed specific comments and we will commission AECOM to make suitable edits that reflect the concerns expressed. Page 42: However, we do not agree with the suggested RDC amendments for the 'Permeable Pavement' text and propose that this is strengthened by more reference to the High Weald Housing Design Guide, particularly as the major development in Battle at Blackfriars is on a slope where surface drainage will be an important issue. Page 43: We agree that these are generic photographs but are examples of what should be achievable in future Battle developments, an example being the reserved matters for a North Trade Road development (RR/2020/2276/P), which includes bin storage areas. There is a need to make reference to DG8 in the High Weald AONB Housing Design Guide. | | |
| BCPNP/R16/2020/4 | Cllr Jonathan Vine-Hall | Rother District Council | | | Whole plan | Comment | <p>Policy HD2 Site Boundaries - RDC recommend at Reg14 that BA32a is only suitable for 15 dwellings, not 20 as stated.</p> <p>Policy HD3 Housing Mix - The policy must take into account strategic policies - Core Strategy Policy LHN1 Achieving Mixed and Balanced Communities and DaSA Policy DHG1 Affordable Housing. The wording of this policy relating to 'a proportion of affordable housing and shared ownership flats' could be seen to undermine the strategic policy DHG1 (affordable housing).</p> <p>Policy HD5 Protection of Landscape - Officers advised at Regulation 14 that the first line of the policy line should be proceeded with 'When appropriate' to avoid this policy being applied to developments of all sizes, which would be unviable in many cases. The final sentence of the policy would be better placed in the supporting text.</p> <p>HD6 Local connection - Officers recommended in the pre-submission review that this policy is deleted. The requirements outlined in this policy are inappropriate and it is not within the planning policy remit to be legally applied.</p> <p>Policy HD9 Town Centre Boundary - The inclusion of this policy in the Submission Plan and the policy statement within HD9 that supports the refu+H10rbishment of existing retail premises within the Town Centre area is welcomed. Rother District Council is the freehold owner of the principal food retail outlet in Battle, and during the production of the Neighbourhood Plan, the Estates Department of the Council has communicated its position to the steering group of the BCNP that it would be open to discuss proposals to consolidate and enhance the commercial offer in this location. It would be clearer for the reader if the term 'town centre' was used consistently in place of the term 'main shopping area' considering the policy context. It is not clear why the amalgamation of existing ground floor retail space is resisted and what evidence there is to support this position. Similarly, it is not clear what is meant by development of 'small scale dwellings' being supported and whether this refers to upper floors of building or all floors. The supporting text should refer to Core Strategy policy BA1 Battle Policy Framework to underline its conformity.</p> <p>Policy IN2 Maintain and Improve Existing Infrastructure - Officers commented at Regulation 14 that the requirements of this policy are a little vague, particularly as many works elements relating to utilities and highways are permitted development. This policy would be better placed in the aspirations section.</p> <p>Policy IN3 Parking and New Development - Officers commented at Regulation 14 that the policy does not expand on the East Sussex County Council parking standards and as such to avoid duplication of the development Plan recommended that this policy is deleted.</p> <p>Policy IN4 Pedestrian Provision and Safety - Suggested changes made by Officer's at the Regulation 14 stage have been integrated into the policy and this is welcomed. It is further recommended that the line 'The Neighbourhood Plan will, where appropriate, require proposals to' is amended to 'Where appropriate, proposals will be required to'.</p> <p>Policy EN2 Conservation of the Natural Environment, Ecosystems and Biodiversity - Comments made at the pre-submission plan review stage have largely been taken on board and this is welcomed.</p> <p>Policy EN3 The High Weald AONB and Countryside Protection - Officers commented at the pre-submission review that this policy will have a disproportionate impact for small development applications. It is unlikely that this could be enforced for smaller applications e.g. an extension being refused for not using local materials. Minor re-wording to the policy such as 'Where appropriate, development must demonstrate that it will' would overcome this concern.</p> <p>Policy ET1 Tourism and Local Economy - Please note that only the Bannatyne Spa Hotel is located in Rother District, the Bannatynes Health Club is within the Hastings administrative boundary. As such, only the Spa Hotel should be listed in the policy.</p> | Y | Y |

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| | | | | | | <p>Policy ET2 Sustaining Local Retail and Encouraging Employment Opportunities - Officers stated during the Regulation 14 consultation, that the employment and retail targets agreed at the neighbourhood area designation have not been included for allocation. The supporting document Battle CP Call for Sites for Retail and Employment 2020 highlights that there are employment sites which are suitable but they have not been allocated. The Rutherfords employment site will continue to be carried forward from the 2006 Local Plan Policy EM4 (some 2.700sq m of the requirement). Once planning permissions and completions have been taken into account the residual figure (from the 10,000sq m target) is 642 sq m of employment space. It is appreciated that the policy is positively worded, but the omission of the employment allocations potentially leaves the parish open to speculative development, which should be avoided. The continued 'saving' of the extant Rutherfords policy from the 2006 Local Plan assists to protect the parish from large scale speculative employment land development. The commentary accompanying policy ET2 does not make a recommendation regarding the allocation of land for identified target set out in Policy BA1 of the Core Strategy for additional retail space. The District Council considers that the Council-owned site at Market Square where the Jempsons convenience store is located offers the most appropriate location for any expansion of convenience retail capacity in Battle and we believe that it would be appropriate to allocate this site for this purpose. However, the District Council would not wish the BCPNP to fail on this point and therefore it is considered that policy could be reworded to include reference to the outstanding requirement for retail floorspace and its suitability in this locality without the need for a specific allocation, wording such as 'It is the intention to support the retention of existing retail outlets within the town centre boundary and further support the provision of the outstanding target for additional convenience goods floorspace primarily at the market square site.' would ensure conformity.</p> <p>Policy ET3 Developer Contributions- Officer comments made for this policy at the Regulation 14 stage have not been taken on board. It is recommended that this policy is omitted from the BCPNP as its intentions are impossible through the planning system. As stated in our Regulation 14 comments, the collection and distribution of CIL monies is not managed through planning policy, however this intention could be placed in the aspirations section.</p> <p>ET4 Protection of Community Assets - Officers recommended at Regulation 14 to move this policy to the community aspirations section. The procedures for registering Assets of Community Value are not via the planning system as such it is outside the scope of planning to implement the intention set out in the policy wording.</p> <p>ET5 Community Leisure and Cultural Facilities - Comments made at the Regulation 14 stage have not been taken into account when developing this policy, including the criteria and the wording of the policy. The objective of the policy is not clear and it is recommended that the policy in its current wording is omitted.</p> <p>Strategic Environmental Assessment - Officer comments made the Regulation 14 stage have been taken into account and no further comments are made at this time.</p> <p>Battle Civil Parish Design Guide - Full comments are submitted separately.</p> | | |
| BCPNP/R16/2020/5 | East Sussex County Council | | | Minerals and Biodiversity | | <p>Although many of the changes that we suggested have been made, we would like to highlight the recommended changes at Regulation 14 which have not been included in the Submission Version of the plan</p> <p>Minerals Planning Authority - Our Regulation 14 response included the following comment: <i>The area identified as a 'Proposed Addition to the Netherfield Development Boundary' on map 2 (page 56) of the draft Battle Neighbourhood Plan, is located partially within the Minerals Safeguarding Area SP-MSA/C British Gypsum as depicted on map 65 (page 145) of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Sites Plan (WMSP) see following link http://consult.eastsussex.gov.uk/file/4409374</i></p> <p>We recommend that the advisory text is added to the written part of 'Policy HD1: Development Boundaries' in order to make it clear that the proposed additional development boundary for Netherfield (Map 2) is an 'Area with permission for underground mining'.</p> <p>With regards to 'Map 2: Proposed Development Boundary -Netherfield' on page 70 (of the submission version) the foot note is somewhat misleading by stating that "the site (in yellow) already has Planning Permission". In actual fact the Planning Permissions which are referenced only cover about 40% of the yellow area; they only relate to the field area labelled West House. The remaining area does not have planning permission for new development.</p> <p>Biodiversity</p> <p>Whilst we are glad to see that some of our Regulation 14 comments have been taken onboard, we would like to reiterate the following points:</p> <p>Natural heritage and ancient woodland: There is still nothing on this included within the text of the plan, although we do note the inclusion of the map (Figure 7) on page 32 of the constraints section.</p> <p>Site allocations and Ecological Impact Assessment: Policy HD2 - <i>All sites should also be subject to an Ecological Impact Assessment (EclA) which should identify potential impacts on biodiversity, follow the mitigation hierarchy and provide a net gain for biodiversity in line with Section 40 of the Natural Environment and Rural Communities Act, paragraphs 170 and 175 of the NPPF and commitments made by the government in the 25 Year Environment Plan, expected to be made mandatory through the forthcoming Environment Act.</i></p> <p>This has largely been taken into account, but the wording of the policy needs to be adjusted to make it clearer with regard to Biodiversity Net Gains (BNG) and the requirements of the Environment Bill. At point 4 the policy states that Biodiversity Net Gain should be provided as on-site or off-site enhancements. The wording needs to reflect the fact that the Environment Bill states that BNG should be provided on-site, and it is only in cases where this is not possible that off-site enhancements can be made.</p> <p>Policy EN1 - Local Green Space Designations. <i>Two of the LGS (Kingsmead Open Space and Coronation Gardens) have been identified as receptor sites for reptiles from the Blackfriars site. As such, they must be protected and managed for reptiles in perpetuity.</i> This point has still not been addressed. It is an important and relevant point which needs to be acknowledged in the plan.</p> | N | Y |
| | | | | | | <p>Policy EN2: Natural Environment - <i>Generally supported, but should also make reference to the protection of Local Wildlife Sites and protected and notable species and habitats. Trees and hedgerows which are of biodiversity value should also be retained and protected.</i> It is good to see that this has been addressed. From a biodiversity point of view we support Policy EN2.</p> <p>It is disappointing to see that the Sussex Local Nature Partnership's Natural Capital Investment Strategy still has not been used as part of the key evidence base.</p> <p>Historic Environment The updated document is much improved. However, we still feel that Figure 8 on page 33 of the revised document is difficult to interpret as there are too many overlapping layers, separate figures with few layers on would definitely help with the visual clarity. The legend still uses incorrect terminology: 'Archaeological Sensitive Areas' should be 'Archaeological Notification Areas'; 'Ancient Monuments' should be 'Scheduled Monuments' – refer to comments 4.6 & 4.7 on page 36 of the 'consultation statement' document provided).</p> <p>We are not clear on what 'Map 8: Heritage Assets' on page 77 of the revised document is showing. We believe it relates to entries tabulated in 'Schedule 2: Battle CP Local Heritage List – non-designated heritage assets' on pages 89-92. We think it would be helpful if the map could be retitled to match the title of Schedule 2, with Schedule 2 making direct reference to this map to avoid any confusion with other classes of non-designated heritage assets.</p> | | |
| BCPNP/R16/2020/6 | | Ashford Borough Council | | | | We have no comments to make. | N | N |
| BCPNP/R16/2020/7 | | Wealden District Council | | | | We have reviewed the document and have no comments to make. | N | N |
| BCPNP/R16/2020/8 | Sara Gomes | Environment Agency | | | Comment | No further comments, and maintain the Regulation 14 comments. | N | N |
| BCPNP/R16/2020/9 | Tamzyn Janes | Southern Water | | | Comment | Regulation 14 comments have been addressed and no further comments to make. | N | N |
| BCPNP/R16/2020/10 | David Furness | | | Whole plan | Comment | The process was corrupt. | Y | Y |
| BCPNP/R16/2020/11 | Edith Gidlow | | | Whole plan | Support | I support the neighbourhood plan | N | Y |
| BCPNP/R16/2020/12 | GINNY GREGORY | | | Whole plan | Support | We are happy to support this plan and appreciate all the work that has gone into it. We feel it is important that a town plan is in place. | N | Y |
| BCPNP/R16/2020/13 | Qian Huang | | | Environmental Policies | Comment | The recommendations and actions proposed really misses the huge opportunity to make Battle fit for the future. For one, the plan has failed to prepare for the national climate change policies to reduce reliance on fossil fuel and push for more green technologies, not just on the roads. as we transition from Covid-19, the way in which Battle residents want to live and work will have shifted dramatically like the rest of the nation. Demand for houses in beautiful countryside commutable to London are rising and Battle will no doubt be a strong contender for many. The provision of diverse and reliable local services, recreation facilities and the infrastructure to support local businesses and local communities stay in Battle should be absolutely critical. Building more roads to accommodate more traffic falls well short of a sustainable plan. | Y | Y |
| BCPNP/R16/2020/14a | Margaret Howell | | | Whole plan | Support | I fully support the neighbourhood Plan for the Civil Parish of Battle | Y | Y |
| BCPNP/R16/2020/14b | Margaret Howell | | | Strategic Environmental Assessment | Support | I fully support the SEA | Y | Y |

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| BCPNP/R16/2020/15a | Melvyn Howell | | | | Whole plan | Support | I fully support the neighbourhood Plan for the Civil Parish of battle | | Y | Y |
| BCPNP/R16/2020/15b | Melvyn Howell | | | | Strategic Environmental Assessment | Support | I fully support the SEA | | Y | Y |
| BCPNP/R16/2020/16a | Adam Clegg | | Alex Yearsley | JLL | Strategic Environmental Assessment, para 1.25 | Object | We disagree. There are sites, such as that promoted by Wates Developments that are unconstrained and readily available and should be actively encouraged for development via an allocation in the Plan. It is considered the incorrect approach for the NP to do the bare minimum in terms of meeting housing need. There should be a more thorough assessment of sites available in Battle and identification of these in the plan would give more control to the Parish on what additional sites they would like to see come forward. | | Y | Y |
| BCPNP/R16/2020/16b | Adam Clegg | | Alex Yearsley | JLL | Strategic Environmental Assessment | Object | We disagree with the approach that the SEA takes for assessing the allocated sites. Numerous sites were identified for potential development within the parish through the 2013 RDC SHLAA and the BCPNP 'Call for Sites'. AECOM were commissioned to undertake an assessment of these sites to establish which are the most appropriate to allocate in the emerging BCPNP to meet the housing requirement and to comply with the Plan's objectives and policies. The AECOM assessment found that there were fifteen sites that were potentially suitable for allocation in the emerging Plan; of these, eight sites have been proposed for allocation under Policy HD2 (Site Allocations). If delivered, the eight sites proposed for allocation would provide a total of 284 dwellings – 11 short of delivering the residual housing requirement. 220 of these houses are projected to be delivered through the proposed BA11 Blackfriars allocation, which is 77% of the total requirement. We consider the emerging Plan's approach to delivering the residual housing requirement may, therefore, fail to meet the basic conditions set out in Schedule 4B of the Town and Country Planning Act 1990; Paragraph 8(2), namely part (d) – the making of the plan contributes to the achievement of sustainable development. | | | |
| BCPNP/R16/2020/17a | Adam Clegg | Wates Development | Alex Yearsley | JLL | Strategic Environmental Assessment, Conclusion para 1.22 | Comment | The Core Strategy does state that 475 dwellings are required for Battle, however, the Council also recognises that there is need to review its Local Plan in order to accommodate a higher level of growth in light of their recognised and persisting lack of five-year housing land supply. Key to this is to identify further development opportunities, particularly for housing. It is considered that the Battle Neighbourhood Plan should assist RDC with meeting their housing targets by allocating additional sites in the Plan that can deliver well in excess of the 475 figure. Wates Developments strongly considers that their site, promoted as part of the Reg 14 Consultation, is suitable, available and deliverable and that there are no constraints from bringing it forward now. | | | |
| BCPNP/R16/2020/17b | Adam Clegg | Wates Development | Alex Yearsley | JLL | Strategic Environmental Assessment, para 1.23 | Object | We disagree. Whilst we recognise that development in Battle is restricted in some regards; there are sites, such as that promoted by Wates Developments that are unconstrained and readily available and should be actively encouraged for development via an allocation in the Plan. There should be a more thorough assessment of sites available in Battle and identification of these in the plan would give more control to the Parish on what additional sites they would like to see some forward. | | | |
| BCPNP/R16/2020/17c | Adam Clegg | Wates Development | Alex Yearsley | JLL | Strategic Environmental Assessment, Conclusion, para 1.39 | Comment | We consider this paragraph misses the key point. It is not a question of whether Battle should have a NP or not. The reasonable alternative is considered to be a NP that allocates additional housing sites. Which we consider would not exacerbate the issues listed, provided the right development in the right locations is allocated. In terms of accessing services, development located in sustainable locations would ensure adequate provision, given the increase in the local population that would result from the provision of new homes. development located in sustainable locations, close to services and public transport connections would not result in a significant increase in car usage, given that walking, cycling and public transport would be viable options for new residents. Vacant farmland is regularly of poor quality in terms of biodiversity and development of such sites would include ecological and biodiversity improvements to the benefit of local wildlife. In terms of the AONB, development of sites such as that promoted by Wates Developments, are unlikely to have an impact on the AONB that would outweigh the benefits of allocating the site for residential development. Wates have prepared a concept masterplan (submitted to the Rother Call for Sites in December 2020) which demonstrates that the scheme to provide houses within the site could be accommodated without significant impacts to the wider visual appearance of the site, which would still remain verdant given the existing and proposed planting to the boundaries. Wates Developments would be happy to provide this plan on request. | | | |
| | | | | | | | Given the proximity of the site to adjacent development, the presence of the new development to the west of the site at the Catesby Development and the ribbon of development located to the north and north east of the site, development of this site would easily assimilate with the existing edge of town character. As such a housing allocation on this site in the Neighbourhood Plan is considered to be unlikely to result in harm to the landscape or scenic beauty of the AONB. | | | |
| BCPNP/R16/2020/17d | Adam Clegg | Wates Development | Alex Yearsley | JLL | Strategic Environmental Assessment, Conclusion, Objective 5 | Object | We disagree with Objective 5. We consider that the Battle NP should consider sites located directly adjacent to the defined development boundary which are subject to no landscape designations over and above the AONB. Wates Developments are promoting a site that is in a sustainable location, directly adjacent to the development boundary and surrounded by existing development. Development of this site would make an important, policy compliant contribution towards housing provision in the area, helping to achieve an excess of the target of 475-500 dwellings in Battle Town over the plan period and to avoid the result of housing policies contained within the NP being out-of-date upon adoption. We consider that the eight preferred sites are unlikely to meet the required housing target / provision for this locality and therefore there will be a shortfall. Development of this promoted site is deliverable and can be brought forward quickly to help contribute to housing provision in the short term, whilst also providing much needed additional affordable housing. | | | |
| BCPNP/R16/2020/17e | Adam Clegg | Wates Development | Alex Yearsley | JLL | Strategic Environmental Assessment, Conclusion, Objective 8 | Comment | We encourage this approach with regard to the allocation of Community Infrastructure Levy monies. However, there is the opportunity for the parish to maximise this opportunity by allocating more housing sites that would in turn provide additional CIL monies. For example, were the site promoted by Wates Developments be allocated, it could generate a significant CIL contribution. | | | |
| BCPNP/R16/2020/17f | Adam Clegg | Wates Development | Alex Yearsley | JLL | Strategic Environmental Assessment, Conclusion, para 3.1-3.8 | Object | We disagree with the approach that the SEA takes for assessing the allocated sites. Numerous sites were identified for potential development within the parish through the 2013 RDC SHLAA and the BCPNP 'Call for Sites'. It is clear that the emerging Plan seeks to meet the localised housing need for Battle (of 470 – 500 units from 2011 – 2028), based on the figure set out in Rother District Council's ("RDC") Development and Site Allocations Local Plan ("DaSA") (adopted December 2019). The AECOM assessment found that there were fifteen sites that were potentially suitable for allocation in the emerging Plan; of these, eight sites have been proposed for allocation under Policy HD2 (Site Allocations). If delivered, the eight sites proposed for allocation would provide a total of 284 dwellings – 11 short of delivering the residual housing requirement. 220 of these houses are projected to be delivered through the proposed BA11 Blackfriars allocation, which is 77% of the total requirement. | | | |
| BCPNP/R16/2020/17g | Adam Clegg | Wates Development | Alex Yearsley | JLL | Strategic Environmental Assessment, Conclusion, para 3.1-3.8 | Comment | We reviewed the eight sites proposed for allocation in the emerging Plan in our Reg 14 representations. This review demonstrated that the majority are unsuitable and/or undeliverable. Therefore, given the RDC pressing and urgent need for housing, the Battle Civil Parish should consider whether sufficient sites have been allocated to meet the minimum need, or whether additional suitable sites could come forward. We consider the emerging Plan's approach to delivering the residual housing requirement may, therefore, fail to meet the basic conditions set out in Schedule 4B of the Town and Country Planning Act 1990; Paragraph 8(2), namely part (d) – the making of the plan contributes to the achievement of sustainable development. The Site reference: BA18: Land at Almonry Farm (South) North Trade Road is not included in the BCPNP proposed site allocations following the assessment made in the AECOM Site Assessment Report which concluded that the Site is located in a wholly rural setting, partly within and adjacent to Ancient and Semi-Natural and Wet Woodland and multiple historic field boundaries across the site. The report therefore agrees with the SHLAA (2013) conclusions that the Site is not suitable for development. We don't agree and set out in our Reg 14 representations why this site could be allocated now. This Site, promoted by Wates Developments, would also provide much needed market housing which carries material weight in the context of NPPF paragraph 59 (boosting significantly the supply of housing), particularly in light of the current 5-year housing land supply shortfall. | | | |
| BCPNP/R16/2020/17h | Adam Clegg | Wates Development | Alex Yearsley | JLL | Strategic Environmental Assessment, Conclusion, para 3.1-3.8 | Comment | The Site would provide essential affordable housing, and this is also a material consideration of substantial weight. The Housing Land Supply 2018 Report indicates that since the start of the plan period (2011) only 504 affordable homes have been built, which even against the DaSA Local Plan target results in a considerable under provision. The Site also has capacity to provide a large area of public open space. | | | |
| BCPNP/R16/2020/17i | Adam Clegg | Wates Development | Alex Yearsley | JLL | Strategic Environmental Assessment, para 4.2/4.3 | Comment | We do not consider that simply not having a Neighbourhood Plan is a reasonable alternative to adopting a Neighbourhood Plan. Whilst it is noted that one reserve site is outlined to accommodate uplift, this is insufficient to meet the demand for Battle and the district of Rother as a whole. Without additional sites it is evident that the Neighbourhood Plans policies relating to housing will be out-of-date upon adoption. | | | |
| BCPNP/R16/2020/17j | Adam Clegg | Wates Development | Alex Yearsley | JLL | Strategic Environmental Assessment, Conclusion, para 5.3/5.4/5.5 | Comment | It is our view that, to meet the basic conditions, the NP will need to allocate additional sites to take account of the wider housing needs in Rother, rather than relying on an assessment of localised need. RDC does not and will not have a five-year housing land supply any time in the near future. Given that the Local Plan housing figures are now out-of-date, the next iteration of the Housing Delivery Test is set against the standard methodology figures that are higher than the adopted Plan. The April 2020 Position Statement – published in November 2020 confirms a 2.87-year housing land supply and that since 2011, there has been an average of 203 dwellings per annum (dpa) delivered in District. The current Standard Methodology requires 740 dpa as of January 2021. In addition, the January 2021 Housing Delivery Test result was 65% for Rother resulting in presumption. Rother has identified a shortfall of at least 1881 dwellings over the plan period (based on 736 dpa prior to January 2021 results– now 740dpa). Battle will therefore inevitably need to accommodate some of this additional housing. On this basis, upon adoption the Battle NP housing figures will be out of date in Policy HD2 which may lead to speculative applications. We consider that Battle can better protect themselves from speculative applications by identifying further sites. | | | |
| BCPNP/R16/2020/17k | Adam Clegg | Wates Development | Alex Yearsley | JLL | Strategic Environmental Assessment, Conclusion, para 5.3/5.4/5.5 | Comment | Remedies to give weight to the emerging BCPN - Engage with Rother so that the new Local Plan is advanced and that a five-year housing land supply is secured and consider allocating additional suitable sites in excess of the minimum set out so that the housing land supply position is enhanced. | | | |

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| BCPNP/R16/2020/17i | Adam Clegg | Wates Development | Alex Yearsley | JLL | Strategic Environmental Assessment, Conclusion, Table 2 | Object | We disagree with several of the assessments of the impacts of Objective 5. Restricting development to within the settlement and outside the AONB will have a positive impact on "improving efficiency in land use and encourage the prudent use of natural resources". We agree that development should generally be steered toward sustainable brownfield sites in the first instance, there must also be recognition that greenfield sites are required. The site promoted by Wates Developments is currently under-utilised and should be considered for development. The Site is within a sustainable, accessible location, where the most efficient use should be made of land in accordance with the NPPF's aim of delivering sustainable mixed communities. | | |
| BCPNP/R16/2020/17n | Adam Clegg | Wates Development | Alex Yearsley | JLL | Neighbourhood Plan, Conclusion, HD1 | Comment | We consider that development sites should not be restricted to only within the development boundary of Battle. Whilst we do agree that sustainable brownfield sites should be prioritised, there also needs to be a recognition that some, sustainably located greenfield sites adjacent to the settlement boundary should also be considered for allocation for residential development. We consider that the emerging Battle NP should consider sites located directly adjacent to the defined development boundary which are subject to no landscape designations over and above the AONB. These sites have the potential to yield a far greater number of residential units that would serve to bolster the five-year housing land supply in Battle and the wider Rother district. At present, we do not believe that Policy HD1 would meet the 'basic conditions' required of a Neighbourhood Plan. | | |
| BCPNP/R16/2020/17n | Adam Clegg | Wates Development | Alex Yearsley | JLL | Neighbourhood Plan, Conclusion, HD2 | Comment | Wates Developments are promoting the site reference: BA18: Land at Almonry Farm (South) North Trade Road that is in a sustainable location directly adjacent to the development boundary and surrounded by existing development. This site could make a significant contribution to supporting the sustainability and longevity of this town for the benefit of the wider community. Development of this site would make an important, policy compliant contribution towards housing provision in the area, helping to achieve in excess of the housing target in Battle Town over the plan period and to avoid the result of housing policies contained within the NP being out-of-date upon adoption. Core Strategy Policy BA1 sets out an objective to provide up to 500 new homes within the plan period. It will not be possible to provide these within the existing settlement boundaries, and consequently some green field land within the AONB will need to be developed. | | |
| BCPNP/R16/2020/17o | Adam Clegg | Wates Development | Alex Yearsley | JLL | Neighbourhood Plan, Conclusion, HD2 | Object | As we set out in our Reg 14 representations, we disagree with the approach that the emerging Battle NP takes for site allocations and it is apparent from a review of draft Policy HD2 that the approach has not changed. It is clear from the rationale and justification of the emerging Plan seeks to meet the localised housing need (now out-of-date for Battle (of 470 – 500 units from 2011 – 2028), based on the figure set out in Rother District Council's ("RDC") Development and Site Allocations Local Plan ("DaSA") (adopted December 2019). 220 of total requirement are projected to be delivered through the proposed BA11 Blackfriars allocation, which is 77% of the total requirement. Its delivery is reliant on a new spine road. Homes England have recently confirmed that they will provide a significant sum of money to contribute to the delivery of this spine road. It is unclear whether this money will fill the infrastructure costs gap, whether the road can be delivered, and indeed, whether the full quota of homes can be delivered. | | |
| BCPNP/R16/2020/17p | Adam Clegg | Wates Development | Alex Yearsley | JLL | Neighbourhood Plan, Conclusion, HD2 | Comment | We consider the emerging Plan's approach to delivering the residual housing requirement may, therefore, fail to meet the basic conditions set out in Schedule 4B of the Town and Country Planning Act 1990. Para 09 of the Neighbourhood Planning Guidance PPG states that an up-to-date housing supply is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development. The Site promoted by Wates Developments reference: BA18: Land at Almonry Farm (South) North Trade Road is not included in the proposed site allocations following the assessment made in the AECOM Site Assessment Report which concluded that the Site is located in a wholly rural setting, partly within and adjacent to Ancient and Semi-Natural and Wet Woodland and multiple historic field boundaries across the site. The report therefore agrees with the SHLAA (2013) conclusions that the Site is not suitable for development. We don't agree and set out in our Reg 14 representations why this site could be allocated now so the Neighbourhood Plan meets the basic conditions. | | |
| BCPNP/R16/2020/17q | Adam Clegg | Wates Development | Alex Yearsley | JLL | Neighbourhood Plan | Comment | To summarise. This Site, promoted by Wates Developments, would also provide much needed market housing which carries material weight in the context of NPPF paragraph 59. The Site would also provide essential affordable housing, and this is also a material consideration of substantial weight. The Battle NP Policy HD2 site allocations are based on out-of-date Core Strategy figures and as such, Battle leaves itself open to speculative applications where Rother falls well short of its 5-year Housing Supply and Delivery. The Core Strategy is more than 5 years old and as such the new standard method is to be used. Allocation of additional sites would align with Policy OVE1 of the DASA which states: "Housing supply and delivery pending plans Housing sites sufficient to meet the Core Strategy requirement of at least 5,700 net additional homes over the period to 2028 will be met by allocations and other provisions in this Plan and Neighbourhood Plans(...)" | | |
| BCPNP/R16/2020/17r | Adam Clegg | Wates Development | Alex Yearsley | JLL | Neighbourhood Plan, HD6 | Object | We object to draft Policy HD6. We do not consider that the Neighbourhood Plan should restrict affordable housing provision to solely those with a local connection. The Policy references conformity to Paragraph 68 of the NPPF, however, it is neither consistent nor relevant to it. We consider that affordable housing generated by new development in Battle must be available to all persons. The draft Policy also references conformity to LHN1 and 2 of the adopted Core Strategy (2014). Draft Policy HD6 is also inconsistent with LHN1 and 2. These policies do not require affordable housing to be allocated to people with a local connection. Draft Policy HD6 is therefore contrary to the NPPF and the adopted Development Plan and fails the basic conditions. | | |
| BCPNP/R16/2020/17s | Adam Clegg | Wates Development | Alex Yearsley | JLL | Neighbourhood Plan, EN3 | Object | We object to draft Policy EN3 as it is inconsistent with the NPPF. Draft Policy EN3 references conformity to Paragraphs 170-183 of the NPPF, however, we do not consider it to be consistent. Draft Policy EN3 sets out several criteria that development must demonstrate which are overly onerous and will serve to stifle the development of suitable sites located within the AONB. As set out in our Regulation 14 representations, we strongly consider that the allocation and subsequent development of the site at: BA18: Land at Almonry Farm (South) North Trade Road would be of significant benefit to the public whilst preserving the beauty of the AONB and would constitute sustainable development. | | |
| BCPNP/R16/2020/17t | Adam Clegg | Wates Development | Alex Yearsley | JLL | Neighbourhood Plan, Map 1 | Comment | Wates Developments considers that their site promoted for development should be included within the proposed alterations to the development boundary as identified in Map 1. We note that the adjacent development site which is currently under construction is proposed for inclusion in the development boundary. The inclusion in the settlement boundary of the site promoted by Wates is located immediately to the east of this site would create a more cohesive settlement boundary. | | |
| BCPNP/R16/2020/17u | Adam Clegg | Wates Development | Alex Yearsley | JLL | Neighbourhood Plan, Conclusion | Comment | Policies HD1, HD2, HD6, EN3 do not meet basic conditions required of a NP. Paragraph 37 of the revised National Planning Policy Framework (NPPF) (2019) states that Neighbourhood Plans must meet certain 'basic conditions' and requirements as set out in paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (as amended). In particular, the Plan should be in general conformity with the Development Plan and have regard to national policies and advice contained in guidance issued by the Secretary of State. | Y | Y |
| BCPNP/R16/2020/18Y | Nick Hanna | Rother Greenways | | | Neighbourhood Plan, Pg18 | Comment | We note the significance attributed to the Battle Schools Greenway (BSG) for Travel to/from Schools (3.5.8), which is "considered to be a very important priority," we also note the comment that 'This segment is likely to be implemented in several small segments when ESCC funding becomes available within their Local Cycling and Walking Infrastructure Plan.' ESCC's LCWIP Draft Summary October 2020 clearly states that it will prioritise areas largely located on the coastal strip and the larger market towns in the County. Rural Rother has not been assigned any funding for the implementation of LCWIP routes at all. We urge Battle Town Council to be pro-active in seeking to secure funding from other sources other than the LCWIP for the implementation of the Battle Schools Greenway, such as the CIL or other sources. | N | N |
| BCPNP/R16/2020/19 | Patrick W Phillips | | | | Neighbourhood Plan, Pg 34, Chpt 3, policy 3.10 | Comment | A plea for a further Ambition for Battle for the Development of Claverham Community College. Battle has a phenomenal and little mentioned asset in this college which provides outstanding quality of 11 to 16 education for more than 1,200 pupils as well as substantial community facilities. Ambition: Battle Town Council should regard CCC as a key asset for Battle and nearby communities. It should support the development of a 6th form there once the cycle / footpath from the station is in prospect because a) it is damaging to the educational interests of its pupils including most Battle secondary age children to have to move elsewhere for their 6th form b) other providers should not be protected from that competition at that cost. Other Comments: Eyesore development to existing buildings: many have been shocked at the appearance of parking developments allowed, being eyesores in the community. Can anything be done about that? | Y | Y |
| BCPNP/R16/2020/20 | Sharon Wyburgh Davis | | | | Neighbourhood Plan, Chpt 3.52 | Comment | Transport in Netherfield: The plan should clarify its explanation of limited bus service. The voluntary bus service runs Monday to Friday. The timetable slightly fluctuates depending on which day of the week & sometimes having no voluntary driver can impact the service. The timetable means that working people cannot use the bus service. There are school buses that come up to Netherfield but no other buses. I have contacted Huw Merriman about lack of transport & he said contact the local councillor which I did & received no response. | N | Y |
| BCPNP/R16/2020/21 | Susan Burton | 1066 Cycle Club | | | Neighbourhood Plan, Chpt 3 and 7 | Comment | 3.5.8.1 am pleased to see the ESCC/Sustrans route plan for improving and/or providing walking and cycling routes within Battle included in the document. Plans are also required for Netherfield. 7.3. We support this section. 7.3.4 Should be further enhanced by connected shared use paths "within" new developments. New infrastructure needs to be linked to existing infrastructure. These steps would make walking or cycling the preferred option for many short journeys. | Y | Y |

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| BCPNP/R16/2020/22 | Kristina Sodomkova | | | | Neighbourhood Plan Objectives/ Strategic Environmental Assessment | Comment | <p>OBJECTIVE 3: The Maintenance of Green Gaps: / OBJECTIVE 5: The Protection of Open Spaces and the Countryside - supportive of OBJECTIVE 7: Enhance the role of Tourism within the Parish - change to eco-tourism in line with other environmental objectives. e.g. tourism that arrives by public transport or using active travel - such as specified in https://www.rother.gov.uk/wp-content/uploads/2020/01/Green_Infrastructure_Background_Paper.pdf that talks of creating cycle routes via Great Battle Wood</p> <p>4.2.36 The most extensive Biodiversity Action Plan habitat in the Battle vicinity is 'wet woodland', most notably the Great Wood. This has a dual recreational function as the largest area of accessible woodland in the District. It has potential for enhanced recreational cycle routes</p> <p>4.2.36 The most extensive Biodiversity Action Plan habitat in the Battle vicinity is 'wet woodland', most notably the Great Wood. This has a dual recreational function as the largest area of accessible woodland in the District. It has potential for enhanced recreational cycle routes Eco-tourism emphasis will help to achieve objectives 2 and 9: OBJECTIVE 2: Traffic Mitigation Measures / OBJECTIVE 9: To alleviate where possible the Traffic Congestion within the Parish - these objectives do not go far enough. The traffic in the High Street should be one way only, with pedestrian access widened. Traffic in opposite direction re-routed via Powdermill Lane.</p> <p>Strategic Environmental Assessment: Relevant aspects of the current and future state of the environment and key sustainability issues; - Battle wildlife verges not included. The Battle meadow verges are a 'half way house' between normal urban verges and wildlife verges, designated in quantity following negotiations with the town council and wild flower group. It's a local designation to East Sussex Highways with no formal nature conservation status - but still of some biodiversity value.</p> | N | N |
| BCPNP/R16/2020/23a | Maurice Holmes | Netherfield Residents Opposition Group | | | Neighbourhood Plan | Comment | <p>Part 2 Development, taking due account of historic factors, does not seem to be addressed in this plan. The list of objections put forward by over 60 homes in Netherfield in the latest Feedback situation, specifically mentioned, under Item 6 (see attachment), the historic Post Office situated within Sites NE5a and NE5r. This building is due to be demolished to erect 10 houses, over and above the total expounded by Rother as appropriate for Netherfield. As engagement with the local community is supposed to underpin this Neighbourhood Plan, how does AECOM appear to have more influence than the local community residents?</p> <p>SWOT Analysis on page 34 Section 3.10. How is it possible to list a series of threats, such as "development which might not meet the needs of the community" and "lack of resources", when clear visions of the communities needs have been provided over the years in many formats, when none of these threats have been addressed or taken into consideration?</p> <p>Section 4.1 (page 35) provides statistics on response rates. The return rates are below what should be considered as being acceptable to implement a Neighbourhood Plan. Given the response rate in Netherfield against the proposals, which have not changed, what evidence does the Steering Group bring forward to support the statement in 4.2 "To reflect the nature of the Parish and the direction the local community wants the plan to take"? For the apparent flawed application on Site NE1, 100 Netherfield homes sent in objections, overwhelming negativity was received at the Memorial meeting in 2017 and 60+ objections in the latest feedback.</p> <p>Objective 1 (Page 36) states "The community acknowledges at least 48 for Netherfield". and "Development boundaries to reflect not only the AONB character of the locality". There is no evidence that the community acknowledges 48 for Netherfield. The proposals are also outside of the current development boundary, which is classed as another determinant for dismissal. Therefore, "reflection on the character" would be impossible and is contradictory to the Rother Policy OSS1(b). How is this compliant with OSS1(e) on restricting new development and sensitive diversification?</p> <p>Objective 2 in the plan would also be unable to be met with the Plan's own assessment that Netherfield would have approximately 200+ new cars associated with the development of these 58 new houses.</p> <p>The character requirements of OSS1(c) in this rural location, such as small-scale infill, would be the preferred option of the community in Netherfield.</p> | Y | Y |
| | | | | | | | Objective 5 - The Protection of Open Spaces and the Countryside, is also completely undermined by the Plan currently being assessed. The 33 houses in the plan, trying to capitalise on the Site NE1 agreement which has questions to answer on its validity, will be built on green belt, AONB and destroy historic buildings to meet the needs of unidentified residents. | | |
| BCPNP/R16/2020/23b | Maurice Holmes | Netherfield Residents Opposition Group | | | Neighbourhood Plan, pg. 37-43 | Comment | <p>Part 3 - Objective No 8 has not been shown to be substantive in this proposed Plan. The statement "whether social, sporting or otherwise" appears to have no proposals within the Plan. The village is in dire need of a Doctor's Surgery along similar lines to the practice in Catsfield. A proposal which would have required tarmac to be laid at the village hall, and supported by residents was vetoed by the District Council stating that it was on AONB. Yet this plan, and its extra 33 houses does just that, with roadways and tarmac.</p> <p>Objective No 9 seeks to alleviate where possible traffic congestion. How can the plan, with an estimated 200+ extra cars originating from the 58 houses on Darvel Down be considered to address that objective?</p> | | |
| | | | | | | | <p>It states under a Policy HD1 ; "The Plan designates development boundaries for Battle and Netherfield". The enclosed Inset Map No 24 of Netherfield, indicates the current and adopted development boundary for Netherfield which has been in place as a Rother policy since 2006. The rest of Map 24 shows that it is all AONB . The Plan's Map No 2 (enclosed) provides a picture to what is apparently factual. It states under Map 2 "site (in yellow) already has planning permission: RR/2017/2308/P and RR/2019/921/P". This implies that the entire site stretching from the western-most extremities of Whitehouse Farm to the Eastern-most extremities of Swallow Barn already have planning permission. They do not. Site NE1 has planning permissions which are going through the process of re-evaluation due to the issues on possession and ownership. There is no other Planning Permission on these sites.</p> <p>The site allocation (48 for Netherfield) was an arbitrary figure imposed on Netherfield, yet resisted for Telham. I challenge the assumption that the figure for Netherfield is a fixed commodity.</p> <p>Section 5.1.2. Policy Intent. Given the detail laid out within the plan and the Rother figure for Netherfield of 48, how do the Steering Group arrive at 33 instead of 23. This will increase the 100 houses already on Darvel Down by an extra 60%.</p> <p>On page 43 under Policy HD5 item I indicates integrating new development sympathetically with its surrounds. The Plan does not reflect this.</p> <p>Included in that assessment by the Steering Group is the Section which offers the Maintenance of Green Gaps. Netherfield currently has a green gap Site NE1 (AONB), currently now known as Darwell Hill (from 1500). Is putting 58 new house in that space achieving that objective?</p> | | |
| BCPNP/R16/2020/23c | Maurice Holmes (NROG) | Netherfield Residents Opposition Group | | | Neighbourhood Plan, pg. 52-56 | | <p>Part 4 -Section 5.3.1 and Objective 5 (page 52) indicates to all residents and others alike, that "Plans must restrict the use of land for development which is primarily already outside of the development boundaries and has been designated as AONB." The Plan put forward by the Steering Group indicates in Map 2, that they are not abiding by their own determinations. This Plan runs contrary to the wishes of the majority of residents, who provided 60+ Feedback Forms with their objections in the recent discussions with the Steering Group at the Netherfield Village Stores and the Village Hall prior to completion of the Plan.</p> <p>How can the Steering Group justify that this Plan also meets the policy outlined in 5.3.3 and Policy EN3 where it states that development will only be supported where it: (2) reflects the settlement pattern of the neighbourhood (the 58 house are exceeding the 16 per hectare on the estate that it adjoins by a minimum of 56.25%), and not result in the degradation of historic features (such as the removal of the Post Office from Site NE5a).</p> <p>Page 56 Section 5.4.1, Policy ET2 and 5.4.2 indicates that the Plan will be supportive to "encourage employment opportunities" and "enhance the role of Tourism in the Parish". Both of those "intents" are unrealistic for the Village of Netherfield. Access to our Village Hall can only be safely undertaken by a vehicle, which restricts even the local residents from attending functions, and sites that might have been available for small business opportunities are in this plan for development.</p> | | |

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| BCPNP/R16/2020/23d | Maurice Holmes (NROG) | Netherfield Residents Opposition Group | | | Neighbourhood Plan, pg. 57-58 | | Part 5 - The Plan states that the Rother Core Strategy omitted Netherfield in any call for employment sites for the village. The 48 houses (Rother's figures) will generate 150 -200 cars, which will increase the potential number of cars to 230 if you use the 58 houses identified in the Plan, yet neither Rother or the Steering Group has provided facilities to enable all those extra people to work locally, save the environment and be sustainable. Objective 8. The only option for a Doctor's surgery, would have been to use the facilities at the Village Hall. This was vetoed by RDC due to the AONB location, however tarmacadam was allowed at site NE1. This objective also indicates how CIL funds will be spent. Proposals will be sent to Battle Town Hall. Residents were unaware of tis requirement and so no proposals have been set before the council. This should be relected in the Plan. | | |
| BCPNP/R16/2020/23e | Maurice Holmes (NROG) | Netherfield Residents Opposition Group | | | Neighbourhood Plan, pg. 61-67 | | Part 6- Community Aspirations - The residents of Netherfield provided a 10 point breakdown of the issues, on the feebak form, that the consultations had raised as troubling. The consultation document by the Steering Group addresses none of those issues. The Plans housing target is incorrect and inconsistent with e Core Strategy. Ambitions section: 3 -reen corridors are only necessary for a brownfield site. The 58 dwellins will remove what is already a 3 hectare green corridor between the old and new parts of Netherfield. 6 - Improve local public transport. The economics of running a public transport system from Netherfield to Heathfield and Battle, do not provide an incentive to any transport organisation, that their efforts will be rewarded from a financial perspective. 7 - Will parents whose children go to the School on Darvel Down, but don't live there, be asked to remove their children so the new families in the 58 houses can get in? There has always has been a bus for Children to Claverham. The problem lies with schooling elsewhere which has never been addressed except by the individual families, using car journeys. 8- How do the Steering Group justify this ambitionwhen the Site proposed by the Residents, NE2, giving access to the Hall and Church was vetoed? 9- The only option from a venue point of view is the Village Hall. There are no other facilities that would be suitable. It would require tarmac on the car park for wheelchairs and prams etc and would have included a footpath in the plan from Darvel Down to the Hall. This was vetoed by Rother. None of Section 4 - Main Issues, pages 17-19 from the Rother Core Strategy 2014 have been met by this Plan as identified in the 6 parts of Objections submitted as representations. | | |
| BCPNP/R16/2020/24 | Matt Verlander | National Grid | Avison Young | | | Comment | National Grid has identified that it has no record of such assets within the Neighbourhood Plan area. | N | Y |
| BCPNP/R16/2020/25 | Graham Bishop | | | | Neighbourhood Plan, policy HD2 | Comment | Action Requested: Provision of information requested on 14 December 2020 under Freedom of Information Act to enable a proper review of the sources of information used by AECOM in their flawed assessment process. A completely fresh review of BA3 and BA NS107 by Rother Council's own planning staff in close co-operation with the owners so that the actual plans can be analysed. | Y | Y |
| BCPNP/R16/2020/26 | Harry Wills | Beech Estate | Christine Dadswell | ASP | Neighbourhood Plan, Chpt 5 Para 5.4.2, Policies HD1, 2, 8, Maps1,7,8 | Comment | Quantum of Housing Allocations: As the district council can only demonstrate 2.87 years' housing supply, the increase in housing requirement requires additional housing allocations across the district. The the District Council is yet to formally establish what the new housing requirement for Battle specifically will be moving forward but the adoption of a Neighbourhood Plan on the basis of the existing Core Strategy requirements would place the draft Neighbourhood Plan at risk of being out of date immediately following adoption. This raises the option to pause work on the Neighbourhood Plan until such a time as the new housing requirement for Battle is clarified or alternatively to provide for a higher number of houses in the Neighbourhood Plan than required by the Core Strategy. There are potential issues regarding the deliverability of the proposed allocation at the Blackfriars site: past attempts to bring forward the site have been stymied by the inability of landowners to agree. There is now an agreed formula for an agreement for funding for the new access road, this is subject to strict timelines as to the progress on the scheme. There is potential that any delays in the progress on the scheme could put the funding into question, without this the potential for the scheme to proceed would be significantly reduced. the funding was granted on the basis that the site would provide 250 dwellings, but the current outline permission is only for up to 220 dwellings and the current reserved matters application is only proposed for 200 dwellings. The neighbourhood plan in its current form assumes that the Blackfriars site will deliver 220 dwellings so at the very least the plan needs to be amended to provide for 20 dwellings on an alternative site or sites in the event that the full amount is not delivered at Blackfriars. If the Blackfriars site proves to be deliverable it is questionable whether it would be deliverable within the plan period for the neighbourhood plan given the stage at which the proposals are at. There are two points we would like to raise about the RDC housing trajectory published as part of their Housing Action Plan in 2020. 1- given that the reserved matters application for the site has only been recently registered with the Council it is questionable whether development will commence in 2021. 2- in terms of the rate of delivery forecasted it would be more sound to presume that a lower amount of units is produced in the year that development commences with the number of units per annum being stepped after thereafter. Therefore there is some doubt whether the BCPNP can deliver the housing requirement within it's 10 year plan period. It is considered appropriate for the neighbourhood plan to consider what an alternative approach to delivering the housing requirement for Battle could look like. | Y | Y |
| | | | | | | | Approach to the revised development boundary: There is no clear justification in the Neighbourhood Plan as to the approach that has been taken to amending the development boundary, but it is noted that it has been extended to include sites with existing permission for residential developments as well as the large majority of the proposed housing allocations. If the aim of extending the development boundary is to take account of sites which have permission to be developed in the future, then for consistency the Beech Estate site granted permission under reference 2018/2666/P should be incorporated into the development boundary. Connected to this given that the ribbon of development along North Trade Road arguably has a closer relationship to the town centre than the ribbon of development to the south of Battle which is within the existing development boundary consideration should also be given as to whether it would be appropriate to include this within the development boundary. We consider that it would be appropriate for the Neighbourhood Plan to undertake a more wholescale review of the development boundary rather than introducing piecemeal additions. Beech Estate hold controlling interest in a large expanse of land to the north-west of Battle and we would like to make representations as to bring two parcels of land under their control forward for development. Land adjacent to Frederick Thatcher Place. This consists of an area of open space which extends to approximately 0.26 hectares. It is currently the subject of an application for 4 dwellings. Land adjacent to Whitelands: The whole parcel of land extends to approximately 1.9 hectares although currently it is only envisaged a portion of the site to the east would be developable. of relevance to the context of the site is the outline permission that was granted on land east of Whitelands for the development of the site for 20 dwellings. The site to the west of Whitelands is more open than that which has been granted permission, in particular it does not benefit from the dense vegetation on frontage of the site. However, the site does remain enclosed from the wider countryside to the north by virtue of the existing ancient woodland which is in the ownership of Beech Estate. Taking this context into account it is considered that the site could accommodate 3-4 dwellings along the frontage of the site in the south-eastern corner and if consideration was had to extending the development boundary to take into account existing development along North Trade Road then it is considered appropriate to extend the development boundary to include a portion of this site. | | |
| | | | | | | | Lack of employment allocations: As a result of a call for sites two offers for employment land were put forward but it was decided not to allocate the sites as it was felt it did not comply with the preference in the Core Strategy for sites to be in close proximity to the town centre. Neither the Development or Site Allocations Plan or the proposed Neighbourhood Plan propose any additional employment sites for one of the main settlements in the district. As part of the employment call for sites exercise we submitted an area of land within our client's wider landholding adjacent to an existing employment site which they operate. On the basis of the success of the current units and the continued high demand, it is proposed that the existing commercial presence at Beech Estate could be expanded through the development of 'Archery Field' for new-build commercial units for a range of uses that would fall within the 'B' use classes. On the basis of the current setup it is anticipated that Archery Field could accommodate in the region of 15 units assuming the whole area is put forward to be developed and that a similar mix of unit sizes to the current set up is put forward. Heritage assets: In Map 8 of the Neighbourhood Plan it is proposed to designate a property (Oast Cottage) as a non-designated heritage asset. Given the relationship of this building with the Grade II listed Farmhouse to the north-east it may be that Oast Cottage is already offered a degree of protection by virtue of being curtilage listed. Considerations should be given as to whether this building requires specific protection as a non-designated heritage asset. | | |

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| BCPNP/R16/2020/27 | Mr & Mrs Nigel Wood | | Ashley Wynn | Greenhayes Planning | Neighbourhood Plan, Chpt 5, policy HD8 | Comment | Our comments relate to the designation of green gaps, which in our client's case involves the designation of a Green Gap 01 which seeks to designate the eastern side of the A2100 London Road as a green gap. Other Green Gaps are proposed at Whatlington Road, Marley Lane and Telham. We are firstly concerned with the level of the justification for these green gaps having regard to the relevant analysis and are also concerned that they do not fulfil the purposes of such designations. It is considered the Green Gaps or the Policy HD8 have not been justified in a policy sense for a number of reasons and do not justify the level of restrictions that are to be imposed. These be expanded upon further and are summarised below; (1) The Green Gaps do not serve any purpose in terms of settlement separation and thus do not meet the aims of NP Objective 3 (2) The Green Gaps do not serve any purpose in respect of coalescence and would they lead to any perception of coalescence (3) There is no justification for the Green Gaps identified or why other similar areas to edge of the main settlements have not designated. F (4) The justification for Green Gaps appear to be proposed on basis of development pressure rather than the purposes or need for Green Gaps. The land that is designated does not lie between any two settlements (5) The concerns of urban sprawl or development pressure can be preserved by the relevant landscape character Policy HD5 of the NP and those within the Rother Local Plans. The AONB designation places great weight to be afforded to these policies and thus is adequate protection. | Y | Y |
| BCPNP/R16/2020/28 | Richard Franklin | Highways England | | | Neighbourhood Plan, Policy HD2: Site Allocations | Comment | Other than the BA11 Blackfriars site, which has recently received planning permission, the other identified development sites are small-scale and we do not envisage that they will have a significant effect on the safe and efficient operation of the Strategic Road Network (the tests set out in DfT Circular 02/2013, particularly paragraphs 9 & 10, and MHCLG NPPF2019, particularly paragraphs 108 and 109). Therefore, Highways England does not have any objections to the November 2020 Battle Neighbourhood Plan. However, Highways England will be concerned with the cumulative impact of development in the Parish upon the A21 corridor and therefore, if proposed new housing sites come forward or the quantum of development in parishes changes, then we will wish to be consulted and may require an assessment of the cumulative impact upon the A21 corridor. We will also require full Transport Assessments to be produced for larger-scale developments that consider the impact of the development on the Strategic Road Network (i.e. A21 in this case) for the opening year and a future year equivalent to 10 years after opening or the end of Local Plan, whichever is later. As such, we welcome the requirements in Objective 2: Traffic Mitigation Measures and Policy IN1: Traffic Mitigation for Transport Assessments to be undertaken for development proposals. | N | Y |
| BCPNP/R16/2020/29 | Simon Harkins | Scotia Gas Networks (SGN) | | | | | My comments at this time are in relation to the site allocations found in Battle and Netherfield. Below is a summary of my findings. All sites should be in a location where the gas network is close by, so the initial physical connection to the system should not be a problem. The demand for each site was estimated based on the number of dwellings. Each was then added and analysed on our Network Analysis Model. From the review I found that the Intermediate Pressure (IP) and Medium Pressure (MP) tiers of the network are relatively robust in this area and at this time the addition of the proposed sites did not pose a risk to the operation of the system or the capacity. Where required, SGN will look to manage the provision of any off-site infrastructure improvements, in line with the overall development growth and / or timescales provided. The full extent of these works will be dependent on the nature and location of the requested load(s), potentially requiring LP reinforcement in addition to that required for the IPMP networks and will only become clear once a developer's request has been received. Reinforcement solutions are likely to involve the provision of a new pipeline in parallel to SGN's existing mains system but may also include the installation of above ground apparatus involving land purchase. As this is a high-level assessment and response, the information provided is indicative only and should be use as a guide to assist you on your assessment. While information obtained through consultation and / or engagement on Local Development Plans is important to our analysis, it only acts to identify potential development areas. | N | Y |
| BCPNP/R16/2020/30 | James Spires | | | | Neighbourhood Plan, pg.69 | Comment | Appendix C does not include certain developments already approved. eg RR/2019/1597/P is listed but not shown in yellow on the map; RR/2017/2390/P is shown in yellow on the map but is not listed; RR/2018/2666P is neither listed or shown in yellow on the map. | Y | Y |
| BCPNP/R16/2020/31 | John Robbins | | | | Neighbourhood Plan | Comment | Regarding development references BA11 and BA31a. Both of these developments will increase vehicular volume entering Battle Hill/Hastings Road at Starrs Mead and Glengorse. Have you considered adding a roundabout at each location to ease (and calm) traffic flow. Oddly this would also benefit the surprising number of drivers that use the entrance to Glengorse as a turnaround for reversing direction from either North (Battle Hill), or South (Hastings Road). | Y | Y |
| BCPNP/R16/2020/32 | Phillip Johnson | | | | Neighbourhood Plan, pg.93, Map 31 | Comment | ESCC Highways have accepted access to/from Blackfriars site onto A2100 to be manageable. (Planning ref RR/2019/604/P) Once a planning application for Glengorse (BA31a) has been submitted, it will be subject to the usual review by ESCC Highways. Does it mean that the existing accesses into Glengorse and the Blackfriars development areas are considered adequate for the proposed number of dwellings, or that some sort of "manageable" improvements will be necessary to cater for increased traffic volumes? It would be reasonable to include something somewhere to flag up what sort of improvements will be necessary as part of the development proposals. In the case of Glengorse this would include a safe pedestrian crossing point in the vicinity of the junction as part of an amended right turn lane into Glengorse. This facility is much needed at the moment and will only be more so with additional housing, especially with the emphasis on increased walking and cycling in the area. | | |
| BCPNP/R16/2020/33 | Sharon Margutti | | | | Neighbourhood Plan, pg.39, Policy HD2 | | More housing should be allocated to the Blackfriars site, originally up to 220-240 houses were discussed for this site. If the upper limit was selected then there would be no need to build on the Caldbeck House (ba36a) or Glengorse (ba31a) sites. By not building at the maximum density at Blackfriars, the Plan is not meeting its own objective 5, to limit development outside of the existing development boundary. | N | Y |
| BCPNP/R16/2020/34a | Barry Holdsworth | | | | Neighbourhood Plan, pg.25, Chpt 3, Policy BA NS118 | Comment | Land to the SW of Cedarwood Care Home should not be included in the shortlist for sites as the AECOM site report states that the access is 'constrained by a narrow lane which has no safe pedestrian access along it'. In addition AECOM states for site BA28 which is opposite BA NS 118 with both using the same lane to access Hastings Rd that 'ESCC Highways advise eastern access is not suitable due to substandard visibility in both directions (onto Hastings Road). In the Strategic Environmental Assessment produced for the Neighbourhood Plan, in table 3 (p25), site BA NS118, objective 10 (reduce road congestion & pollution.... reduce car travel) is categorised as 'green'. How can this be listed as green as the site is over 2.5km from the main facilities in Battle High Street. People will not be walking into town / cycle from this location, as it takes approx 1hr 15mins to complete a return walk trip. site BA23 is categorised as 'red', for the same objective despite being ½ the distance that BA NS118 is from Battle centre, this makes no logical sense. Table 3 (p25), for objective 11 (reduce emissions of greenhouse gases), all sites are rated as 'amber', this scoring is flawed as surely those sites that are close to the town centre / the rail station are more likely to encourage trips to be made which do not create greenhouse gases / pollution (eg walk / cycle), compared to those sites that are far from facilities. table 4 (p27), the text for site BA NS118 states that 'The capacity of the site is a relatively small figure, therefore should not significantly increase the concentration of vehicle traffic. Listed building adjacent to the site. It is a green field site.', as such it is given a 'green' rating. As noted above this seems to be based on flawed logic, that it is fine to build on locations that are poorly served by public transport / far from public facilities on foot, as long as they are small in number. The 'Red Amber Green' scoring of the shortlisted sites should be performed again to see which sites should be shortlisted for the Neighbourhood Plan. Surface water is an issue from the proposed BA NS 118 site which will be exacerbated by development. | | |
| BCPNP/R16/2020/34b | Barry Holdsworth | | | | Strategic Environmental Assessment, pg.25, Chpt 3, Policy BA31a, para 3, Map 3 | Comment | BA31a/ BA23: Land r/o 26 Hastings Road Site BA31a – Glengorse. If all development is not delivered at Blackfriars as per my point above, then the 20 proposed houses should go ahead, however, as the site previously offered to accommodate 35 houses, the site should be amended so that the 20 go ahead now, with the extra 15 being developed if the number of homes that RDC have to deliver increases. Cutting the development off at an arbitrary 20 homes (why not 25 or 35) to spread the impact of development, makes no sense when this site is much closer to the town and its facilities compared to other sites, and this would avoid the need to build on other green field sites. | Y | Y |
| BCPNP/R16/2020/34c | Barry Holdsworth | | | | Strategic Environmental Assessment, pg.25, Chpt 3, Policy BA31a, para 3, Map 4 | Comment | BA11: Land at Blackfriars Battle Town Council should allocate more housing at the Blackfriars site than the 220 houses currently proposed by the Plan. Up to 250 houses has been proposed at the site by various agencies, it is better to build at a higher density at the main site, which is closer to the town centre than many other of the sites. All of the proposed development could be delivered at Blackfriars without building on any extra greenfield sites and still keep within the 250 houses limit. | Y | Y |
| BCPNP/R16/2020/34d | Barry Holdsworth | | | | Neighbourhood Plan, pg.90, Chpt 2, Policy 46, para 2, Map 2 | Comment | Schedule 2: Battle CP Local Heritage List – non-designated heritage assets 46 Small Barn, Great Barn, 3 Loose Farm Barns TQ 76169 14731/TQ 76106 14723 I specifically asked the Council not to come on our land, take photos or list our property. But they disregarded my request and entered through a private road. Our property is featured on page 32 of Annexe 1: Battle CP Design Guidelines against our wishes. The representatives are not qualified to assess our property and we do not want our property to be on a public list and this will invite people to enter our private road and trespass our land, to 'see' the properties of interest on the list. It is unsettling that they wilfully disregard our wishes. | N | N |
| BCPNP/R16/2020/35a | Neil Georgeson | | | | Neighbourhood Plan, pg.90 | Comment | Site 46 of the non-designated local heritage site includes three residential addresses that make up an attractive group of stone barns. However, it does not include the 'Selenex' property that makes up the same group of aforementioned farm buildings which is also made of stone and should be included. Adjacent Cedarwood House should also be included as it is the Edwardian Farmhouse that accompanies the group of stone farm buildings. Together these buildings make up an attractive collection of farm buildings which are part of the areas rural heritage. | N | Y |

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| BCPNP/R16/2020/35b | Neil Georgeson | | | | Neighbourhood Plan, pg.93 | Comment | The density of development at the main Blackfriars site should be increased to the maximum allowed to potentially avoid the need to build on other green field sites. The current Rother Plan / the Battle Neighbourhood Plan aims to minimise development in the AONB / areas outside the development boundary. If development density at Blackfriars is raised this may avoid the need to build on other sites, eg site BA31 (Glengorse), which is outside the current development boundary, next to a proposed non-designated local heritage site and delivers relatively few houses. | | |
| BCPNP/R16/2020/35c | Neil Georgeson | | | | Neighbourhood Plan, pg.90 | Comment | Local Heritage - Non designated sites. For site 46, 3 properties are listed (Small Barn, 3 Loose Farm Barns & Great Barn), the list should include Selénex which is joined to the aforementioned three buildings and is built also out of stone and brick. These 4 properties make up the set of previously farm related buildings. The adjacent Cedarwood House should be added as this was the Victorian/ Edwardian farm house for the set of farm buildings that are proposed to be designated, and the adjacent 3 Loose Farm Cottages should be added as this is a 18th Century farm workers cottage. Next door is 4 Loose Farm Cottage which is grade 2 listed, as it is the 17thC farm house. Together these buildings reflect 400 years of farming at this location. | | |
| BCPNP/R16/2020/36a | Rosalyn Day | Crowhurst Parish Council | | | Neighbourhood Plan, pg.39, HD2 | Comment | We particularly support points 2-4 of policy HD2 about supporting biodiversity. However would prefer point 4 to say that the biodiversity net gain MUST be on site unless it can be shown that this is not possible, and then go on to say how off site net gain can be achieved. | N | N |
| BCPNP/R16/2020/36b | Rosalyn Day | Crowhurst Parish Council | | | Neighbourhood Plan, pg.51, EN2 | Comment | We support Policy EN2 but feel that it could go further to enhance green spaces within the environs of Battle. 1) Should "min 10% net gain" be added to the sentence provide net gains for biodiversity ..." to link in with Policy HD2? 2)) It is rather limiting to only mention swifts. There are so many other possible ideas to support local wildlife: for example, lighting, boundaries that have gaps for movement of wildlife etc. We note that low level lighting and other nesting features are mentioned in Ambition 3 (7.4.2) . We feel that the link with the adopted High Weald Design Guide should be mentioned in the Policy. | | |
| BCPNP/R16/2020/36c | Rosalyn Day | Crowhurst Parish Council | | | Neighbourhood Plan | Comment | Climate Change/Sustainability - The Neighbourhood Plan could have gone much further in promoting development that may help mitigate the effects of the climate emergency and on the sustainability of developments. Other than a small section on Eco Housing in the Design Guide, there is very little on energy efficiency, carbon reduction etc. | | |
| BCPNP/R16/2020/37a | Stephen France | | | | Neighbourhood Plan, pg. 70 | Object | I wish to oppose the inclusion of the brownfield area to the South of NE06 (White house farm) within the proposed Netherfield development boundary, which will make it significantly easier to develop in the future as there is generally a 'presumption in favor of development' for land within the boundary. The decision to include it appears to have been made behind closed doors, in contradiction to the evidence presented for the plan, and in opposition to local opinion. My specific objections to the inclusion of the area, are that it is not-needed to achieve the housing target, the evidence shows it to be unsuitable for development, and future development in this area is not wanted by the villagers of Netherfield. | Y | Y |
| BCPNP/R16/2020/37b | Stephen France | | | | Neighbourhood Plan, pg. 70, Policy IN1, Map 2 | Comment | I'm concerned that the planned development at NE06 will have a detrimental affect on the traffic calming measures that have been put in place on the B2096 through Netherfield. The removal of the central road marking, has had a noticeable effect of reducing traffic speed through the village as in other rural populated areas. Any new traffic to this development will want to connect directly to the B2096. Traffic speeds will increase and the living quality of the village will be diminished. The steering group indicates that it is actively working to bring the developments planned for NE01 and NE05ar on to the B2096, despite that option already being rejected by East Sussex highways. There are frustrations about additional traffic in the Darvel Down estate, but trying to bring the developments out on to the main road will also have significant adverse affects on the village and likely be in breach of proposed policy IN1, if it compromises the existing traffic calming methods. | Y | Y |
| BCPNP/R16/2020/38a | Leslie Robinson | | | | Neighbourhood Plan, Policy HD2, Map 4a, pg.94 | Object | I object to the allocation of the site BA36a for development: 1- Area D could be excluded from the development boundary. The character of this part of Calbec Hill will change with more development on the frontage. Countryside policies should be considered. 2- The inclusion of BA36a is a threat to the semi-rural character of Calbec Hill. The site cannot accomodate 10 dwellings and the assesment did not take into account the rural character of the area. | Y | Y |
| BCPNP/R16/2020/38b | Leslie Robinson | | | | Neighbourhood Plan, Policy HD1, para 5.1, App.C | Object | I object the the inclusion of Area D in the development boundary. This land makes a contribution to the semi-rural part of Calbec Hill.If the frontages to the roads are included within the development framework it will lead to the deopment of open land and more intensive development of only partly developed land. If Area D remains outside the boundary, the LPA will be beter able to control change to the frontage. | | |
| BCPNP/R16/2020/39a | J Lovering & G Lines | New Farmhouse Ltd | Polly Canning | Kember Loudan Williams | Neighbourhood Plan, HD1, Map 1 | Object | We do not agree with the Development Boundary as currently drafted and ask that further changes are made in order to allow additional housing and employment sites to come forward during the plan period. We respectfully request that the following two sites are reconsidered for housing and included within the Development Boundary: BA NS 117: Land East of and adjacent to Cherry Gardens Allotments and Mount Street Car Park; BA NS116/BA28: Land North of Loose Farm. As no new employment sites have been identified in the Neighbourhood Plan, we wish to also bring to your attention two new sites which we believe are entirely suitable for employment type uses: Land to the north of Battle Wastewater Treatment Works, Marley Lane, TN33 0RA; and Land and buildings at Marley Farm, Marley Lane, TN33 this continuing support for "modest peripheral growth" on the edge of the development boundary the Neighbourhood Plan will not be in general conformity with the spatial policies of the development plan. We therefore object to both the wording of the draft policy HD1 and the development boundary itself as currently drafted on Map 1. | Y | Y |
| BCPNP/R16/2020/39b | J Lovering & G Lines | New Farmhouse Ltd | Polly Canning | Kember Loudan Williams | Neighbourhood Plan, HD1 | Object | We have serious reservations about Policy HD2. Neighbourhood Plans and their policies must meet the Basic Conditions as set out in legislation. It is our assertion that Policy HD2 fails these basic conditions. - It is incumbent on Neighbourhood Plan Steering Group to identify suitable sites to contribute towards meeting at least 475-500 dwellings by 2028. - The Neighbourhood Plan Steering Group simply cannot assume all 220 units at Blackfriars are going to come forward by 2028 - Policy HD2 makes the assumption that a number of other developments that have been given planning permission for housing will come forward within the plan period. This is considered unrealistic. - It is not good enough to be relying on the Housing Land Supply data from 1April 2019. The evidence must be more relevant to justify this figure and market signals have to be taken into account. -Site BA NS 117 is considered ideally suited for housing and we ask that it is reallocated in the plan - Site BA NS116/BA28: Land North of Loose Farm as a site allocation | | |
| BCPNP/R16/2020/39c | J Lovering & G Lines | New Farmhouse Ltd | Polly Canning | Kember Loudan Williams | Neighbourhood Plan, HD8, App.D | Object | We wish to question therefore the justification for these Green Gaps and the additional protection that it would provide. These "Green Gaps" are simply not necessary. These areas already benefit from other layers of protection (being located in the AONB and outside of the Development Boundary) and so we do not understand the justification for adding any additional layers of protection. Rother District Council removed a large part land to the south of Battle near Telham from their Strategic Gap policy in the Development and Site Allocation Local Plan, now the Neighbourhood Plan are seeking to reintroducing it in Telham and proposing three new Green Gaps around Battle. | | |
| BCPNP/R16/2020/39d | J Lovering & G Lines | New Farmhouse Ltd | Polly Canning | Kember Loudan Williams | Neighbourhood Plan, ET2 | Comment | We wish to therefore draw your attention to two particular sites that are suitable, available and deliverable for employment uses and ask that they are given due consideration: 1)Land north of Battle wastewater treatment works – there are two large and modern agricultural buildings on this site which could be reused and adapted for employment type uses. The land surrounding these buildings could also be developed to create a new business park suitable for a mix of employment uses. 2)Land at Marley Farm – The site contains an extensive range of ruined former agricultural buildings. It is considered ideally suited for a modest employment type use as the development of this site would tidy it up and it benefits from good and direct access to the A21 trunk road. | | |
| BCPNP/R16/2020/40 | Jo Barnes | | | | Neighbourhood Plan, pg.48, Chpt 5.2 | Comment | Comments around infrastructure are great but the reality is that they are not considered. The Blackfriars site is forecast not to impact on roads, but all of the schools, doctor surgeries, dentist and even shops are all up the high street there is no link to the railway station. There will be few local people who can afford these houses, it will create more cars, more pollution and impact all of the local infrastructure. The local hospital also serves Hastings, Bexhill etc. How can destroying natural habitat in the local area support reducing climate change? We will have more traffic, more pollution regardless of whether these houses end up being carbon neutral the impact on the community is not. Starrs Mead is dangerous in winter because of ice on a bad corner. There is flooding every year in winter now on the local roads. Water supply - in the South East the infrastructure was at breaking point. A new reservoir is needed. | | |
| BCPNP/R16/2020/41 | Tim Underhill | | | | Neighbourhood Plan, policy IN4 | | Further efforts should be made to reduce traffic and pollution in Battle High street, and to improve pedestrian safety and access. Heavy vehicles should be barred from the High Street and routed via the A21 once the Queensway Gateway is operational. A raised pedestrian crossing required near the passage to the car park, also the pavement widened on the east side of the High Street with reduced on-street parking. | Y | Y |
| BCPNP/R16/2020/42 | Linda Cove | | | | Neighbourhood Plan, pg.85 | Objection | Objection of BTC Highways Plan to provide roadside protection GS05 on Caldbeck hill Battle: this piece of land must be maintained as parking land for the residents who live here. | Y | Y |
| BCPNP/R16/2020/43 | Shelagh Weir | | | | Neighbourhood Plan, pg.85 | Objection | Objection to BTC support for ESCC Highways plan `to provide roadside protection fence' at the Open Space (GS05) on Caldbeck Hill. The small parking space on the Open Space is essential for 10 dwellings opposite, which include several elderly and infirm residents and families with small children. | Y | Y |

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| BCPNP/R16/2020/44 | Bradley Caine | Rother Investment Group | Nick Ide | Ide Planning | Neighbourhood Plan, Inset map 4b | Objection | Objection is made to the proposed allocation of land at Glengorse as non-designated heritage assets (NDHA) as shown on Appendix C Inset Map 4b under ref. BLL48. The objection divides into three parts: 1 - Only the former school building and its immediate grounds to the east, encircled by the access road, should be designated as a NDHA. Designations elsewhere over the Estate are not justified by reference to Historic England Advice Note 7. 2 - the area originally shown as BA31a in the LPA's 2013 dated SHLAA is attached to the cover email. This parcel is one submitted to the LPA in response to its recent call for sites. Appendix C map 7 which also shows existing employment sites should square with the p29 map in the main document. Objection is made to the designation of the balance of the BA31a area as a NDHA. 3. Objection is also made to the designation of two parcels of land to the north of the former school at (centre point) grid ref. TQ75642 15073 (land off the existing highway also named Glengorse) and abutting this to the west at TQ75510 15077) - neither contributes to the setting of the former school and nor do they meet the Historic England criteria. | Y | Y |
| BCPNP/R16/2020/45 | Hilary Sexton | | | | Neighbourhood Plan, pg.85, policy BA GS05 | Objection | The residents that use the parking welcome a wild flower meadow, but feel a small part should be designated parking, leaving a large area for the meadow. There are elderly residents here with carers, and those with young children, who require parking close by. | Y | Y |
| BCPNP/R16/2020/46 | Linda Ford | | | | Neighbourhood Plan, pg.85,GS05 | Objection | Objection to BTCThe parking spaces on the open space 'The Green' are extremely important to the residents who live on the unmade track opposite. | Y | Y |
| BCPNP/R16/2020/47 | Jeremy Field | | | | Neighbourhood Plan, pg.85, policy EN1 | Objection | Green space BA GS05 Part of the roadside area should be designated for residents' parking with Grasscrete or similar surface to minimise visual impact. | N | Y |
| BCPNP/R16/2020/48 | John Sydes | | | | Neighbourhood Plan, pg.84, policy BAGS05 | Objection | Objection of BTC Highways Plan to provide roadside protection GS05 on Caldbec Hill Battle. Forcing the local community to disallow their customary right to park on a small piece of a roadside green, is an act of gross disregard to the lives of this small community of Battle residence. | | |
| BCPNP/R16/2020/49 | Nichola Ho | | | | Neighbourhood Plan | Objection | Objection to BTC support for ESCC Highways plan 'to provide roadside protection fence' at the Open Space (GS05) on Caldbec Hill. The small parking space on the Open Space is essential for ten dwellings opposite, which includes elderly as well as those like us with very young children. The alternative which would be dangerous roadside parking on an already crammed road does not make good common sense. | Y | Y |
| BCPNP/R16/2020/50 | Nicholas Whistler | | | | Neighbourhood Plan | Comment | I am presently resident in Canada, but from now am living in Caldbec House for the winters, 3-4 months. I do not wish my home to be included as a heritage asset. We have owned and preserved it for centuries, I have owned it since 1992, this well-intentioned designation is likely to have unintended negative consequences. Our garden and field opposite Caldbec House, is now nearly a parking lot, and the BTC would be better to assist me to buy it back.. It was seized 1968-74 as it was thought to be unsafe to have a bend in the road on the top of a hill, and that is now where all my neighbours who had no parking, park free on our old kitchen garden, at liability to Highways, and the continuing ruination of our home, and the entry to old Battle. | Y | Y |
| BCPNP/R16/2020/51 | Simon Mansfield | | | | Neighbourhood Plan, pg.64 | Comment | There is a possibility that the NE01 site south of Darvell Down is the site of the 'Battle of Hastings' even though it is believed to be at the Abbey, so it would be worthwhile checking when footings are started in case I am correct. | Y | Y |
| BCPNP/R16/2020/52 | Sriram Govindarajan | | | | Neighbourhood Plan, pg.64 | Comment | Consider recommending a bus service from Battle to Heathfield by Road B2096. This would improve public transportation to the residents of Netherfields | N | Y |
| BCPNP/R16/2020/53 | Victoria Kirkham Natural England | Natural England | | | | Comment | Natural England does not have any specific comments on the Battle Civil Parish Neighbourhood Plan. | N | Y |