From: Battle Neighbourhood Plan
To: JOHN SLATER
Cc: [redacted] Julia Edwards; Donna Moles; [redacted]
Subject: Battle CP NP SG concerns about Green Gaps
Date: 04 May 2021 20:09:16

Dear Mr Slater,

We are writing to you because we have only recently become aware of Rother District Council's response to the questions that you raised with them about Green Gaps and we would like to take this opportunity to set out our position as follows:

The NP Submission Plan (2020-Nov), having been written and subsequently adopted by BTC, included proposals for four Green Gaps (GG). These potential GG were determined by local resident volunteers in the Steering Group (SG), following extensive consultation, and not by planning professionals. (See Submission Plan Appendix D page 78)

The SG proposals in the Submission Plan were made following detailed advice from RDC officers, but the complexity of planning rules and policies in this regard are difficult to understand, for a lay person. Furthermore, the SG wished to present our case for the potential GG in a way that would be most readily comprehended by similarly non-professional readers.

It should be noted that during the RDC consultation process we were persuaded to reduce the number of GG proposed for inclusion and we spent considerable time and effort to very fully describe the detailed reasons for only selecting the four areas included in the Submission Plan.

Without the RDC advice several other GG areas would have been included, since overall, our intention was to take account of the GG designation carrying out an additional function that goes above and beyond the usual RDC definition as stated in Appendix D:

"The Battle Civil Parish Neighbourhood Plan Steering Group (BATTLE CP NP SG), accept the Rother District Council (RDC) definition of a Strategic Gap or a Green Gap as "an area of land which helps determine the separation of settlements and protect their individual character".

"The particular objectives of the Gap are:
a. To maintain the separate identity and distinctiveness between settlements
b. To maintain the strategic settlement pattern
c. To prevent the coalescence of settlements"
It should be noted that there are two criteria a and b above that are in addition to "coalescence of settlements" (c above).

When referring to the "separation of settlements" concept, which in the case of Battle we consider has an unusual additional function of demonstrating a positive separation along the key roads in/out of Battle town; these mostly have rather long, often contour-clinging, former linear housing development. The GG proposals do not in some cases distinctively separate settlements but they will positively separate the street scene characteristics of the roads concerned. They will provide important recognition of the transition from the town-connected linear housing to the more random occasional housing along these routes

between Battle and further away settlements. The criteria a and b do, in our view, apply to the four sites and should be considered.

We believe the maps produced by RDC and delivered to you even more clearly demonstrate our analysis used in Key Evidence base document: Green Gap analysis - version 5.0.

With careful interpretation we believe that the proposed GG01 map shows a strong and distinctive separation that we wish to be maintained between Battle CP development boundary and more random occasional housing up to the CP boundary, in order to retain separation with Whatlington Parish. Similarly, the proposed GG02 map shows an important separation that we wish to be maintained between the development boundary of Virgins Lane and Canadia, particularly because this terrain includes a Malfosse of significant historic interest. Notably GG03 map demonstrates a very distinct change from dense urban development to country lane characteristics before random occasional housing takes over to the east. The proposed GG04 map may not make a reader fully aware of the complex characteristics that we described in our GG analysis v5.0; however, GG04-north is a sensitive area forming the "countryside entrance", from the east of the Battle CP; meanwhile GG04-south contains a SSSI and further development/infill of the large properties would adversely impact views to the north-west towards Battle Abbey and westwards from this high point to Beachy Head.

We believe the justification for inclusion of the Green Gaps is strongly supported by the detailed evidence in the supporting Key Evidence base document: Green Gap analysis - version 5.0: https://tinyurl.com/e2waw38b

Kind regards,

Margaret Howell,
Chair of Battle CP NP Steering Group