



BATTLE

CIVIL PARISH

NEIGHBOURHOOD

PLAN (BCPNP)

Pre-Submission

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FOREWORD

Battle occupies a unique place in the history and consequential development of the United Kingdom. When the decision was taken on 13 April 2015 by Battle Town Council to prepare a Neighbourhood Plan for Battle Civil Parish under the Localism Act of 2011, this was done with sensitivity so as to preserve the special features of our community. This includes Battle town itself, the village of Netherfield and the hamlet of Telham. Under this Act, several new rights and powers to allow local communities to shape new housing development was introduced, including the provision of a Neighbourhood Plan. This forms the statutory planning document by which local development requirements can be outlined. A Neighbourhood Plan Steering Group was formed, composed of Councillors, volunteers from the local community, and with additional help from advisors, brought in as necessary to contribute their expertise in their field.

We work closely with Rother District Council, who offer advice and assistance, along with our professional consultant, Moles Consultancy. And we have, at all stages, sought the views of the local community.

A survey document was delivered to every household early in 2016, and feedback was evaluated; the results can be seen on the website. Subsequently, two Public Consultations were held, one in 2017, the other in 2019. Feedback from these, consultations were analysed, and the resulting information can be seen on our website: battleneighbourhoodplan.co.uk

Residents are kept up to date by the website, Facebook, and regular articles in the local press, the town council newsletter etc. This Neighbourhood Plan aims to have a positive impact on the future development of Battle, and address some issues faced by the Parish, such as affordable housing, smaller homes for the elderly and young people of the Parish. It is also an encouragement for the community to consider some of the aspirations that are beyond the scope of the Plan but are nevertheless achievable through working collectively.

Battle is a challenging town to implement a Neighbourhood Plan due to its historic and complex geographical location. But it is well worth the effort to create new homes for our families and friends, and to have a say where they can live. Most importantly we can decide where we want to spend money provided by developers on local projects through the Community Infrastructure Levy (CIL). We are, after all, one of the largest civil Parishes in the area, and being in an Area of Outstanding Natural Beauty does put us under greater pressure.

The Steering Group wishes to thank the community for their continued involvement and support throughout the preparation of the Neighbourhood Plan. This include past and present members of the Group, and as Chair I must specifically thank my fellow members of the Steering Group, Battle Town Council; the Clerk and Assistant Clerk for all their hard work and dedication.

An electronic copy of this Plan can be found online at: <http://battleneighbourhoodplan.co.uk>

Margaret Howell
(Chairman of the Steering Group) January 2020

SECTION 1: Introduction and Background

1.1 Introduction

- 1.1.1 The town of Battle marks the world renowned site of the Battle of Hastings in 1066, which gave the town its name. The town began with the erection of the Abbey by the Norman victors as a penance for the dead of the battle and afterwards, and to mark where, King Harold was killed. The town grew up in the late eleventh century to provide the trades required for the building work: there were over a hundred houses by 1105 and their sites can still be traced. Henry I encouraged the town with grants of licences for fairs and markets, the last cattle market survived until the 1960s to be replaced by a new library and housing close to the (now) TenSixtySix roundabout. Building of St Mary's Church began in the early twelfth century for the needs of the local population, a function it still serves. Development of the town, north and south, was along one of the principal High Weald ridges.
- 1.1.2 Battle Parish has many characteristics which determine that this is a different, renowned part of the country, with an historical dimension dating back more than a millennium. It is of International as well as National importance, but in common with many rural communities at the present time is required to plan its development for the future.
- 1.1.3 In order to ensure that Parish growth is planned in a manner which brings the community on board, a Neighbourhood Plan is being prepared. This will focus on housing development, employment, parking, highways, heritage and design.
- 1.1.4 *'What is neighbourhood planning? Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. They are able to choose where they want new homes, shops and offices to be built, have their say on what those new buildings should look like and what infrastructure should be provided, and grant planning permission for the new buildings they want to see go ahead. Neighbourhood planning provides a powerful set of tools for local people to plan for the types of development to meet their community's needs and where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area.'* (Extract taken from Planning Practice Guidance Paragraph: 001 Reference ID: 41-001-20190509 Revision date: 09 05 2019)
- 1.1.5 A Neighbourhood Development Plan (BCPNP) should support the strategic development needs set out in the relevant Local Plan/ Core Strategy and plan positively to support local development (as outlined in the National Planning Policy Framework).
- 1.1.6 A BCPNP should address the development and use of land and include land use policies. This is because if successful at examination and referendum the Plan will become part of the statutory Development Plan once it has been made (brought into legal force) by the planning authority. Applications for planning permission must be determined in accordance with the Development Plan, unless material considerations indicate otherwise (see section 38(6) of the Planning and Compulsory Purchase Act 2004).
- 1.1.7 The Battle Civil Parish Neighbourhood Plan (BCPNP) was led by extensive public consultation and prepared by a steering group of volunteers representing a range of interests across the Parish.
- 1.1.8 The BCPNP has been prepared in accordance with the Neighbourhood Planning Regulations 2012, The Localism Act 2011 and Directive 2001/42/EC on Strategic Environmental Assessment.
- 1.1.9 Battle Town Council applied and was designated a Neighbourhood Area by resolution CB14/80 on the 13th April 2015. See the Area Designation Plan Map.

1.2 Neighbourhood Area Designation – Delineated by the Civil Parish Boundary

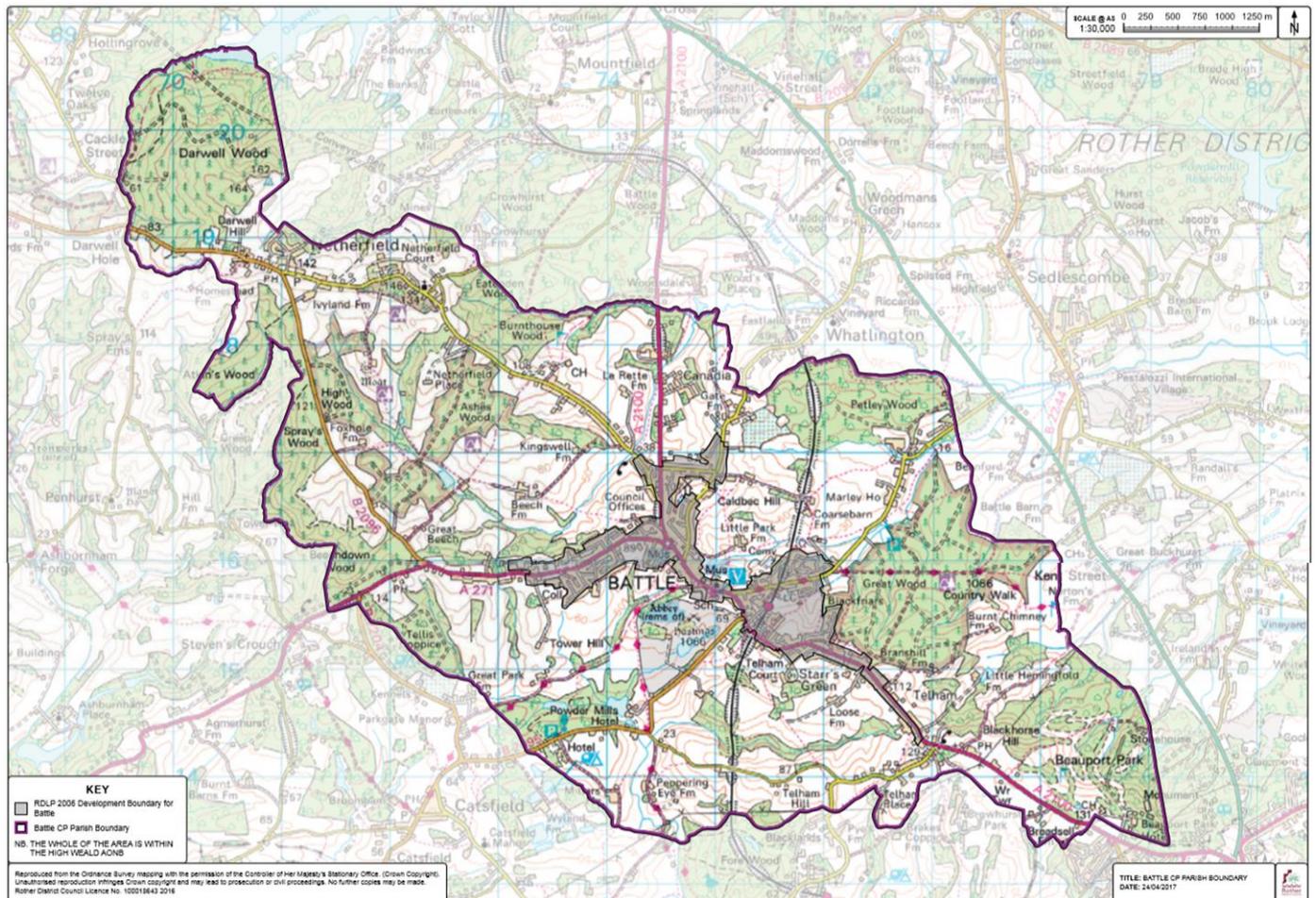


Figure 1: Area Designation map

1.3 The Planning Policy Context

National Planning Policy Framework

- 1.3.1 Neighbourhood Development Plans have been prepared in England since provided for in the 2011 Localism Act. The National Planning Policy Framework (NPPF 2019) outlines what an BCPNP can do.
- 1.3.2 The NPPF 2019 replaces the pre-existing Planning Policy Statements (PPSs) and Guidance Notes (PPGs).
- 1.3.3 The NPPF 2019 sets out the Government's planning policies for England. It was published on 27th March 2012, updated on 24th July 2018 and revised on 19th February 2019. The National Planning Policy Framework is a key part of the Government's reforms to make the planning system less complex and easier to understand. It vastly reduced the number of pages of national policy about planning.
- 1.3.4 The National Planning Policy Framework must be taken into account in the preparation of Local and Neighbourhood Development Plans and is a material consideration in planning decisions. It states that in order to be considered sound a Local Plan should be consistent with national planning policy.

1.3.5 **Planning Practice Guidance**

On 6 March 2014, the then Department for Communities and Local Government (DCLG), now called Ministry of Housing, Communities and Local Government (MHCLG) launched this planning practice guidance web-based resource. For the first time, planning practice guidance is now available entirely online in a usable and accessible way. Important information for any user of the planning system previously only published in separate documents can now be found quickly and simply. It contains a very useful guidance section on BCPNPs. You can link easily between the National Planning Practice guidance, as well as between different categories of guidance.

1.3.6 **Local Planning context**

All Neighbourhood Plans must be in general conformity with the strategic policies for an area (which is generally taken to be a Council's Core Strategy or equivalent Local Plan) as well as have regard to the National Planning Policy Framework (NPPF 2019) and accord with European Legislation. The local statutory planning context for preparation of the EBCPNP is the Rother Core Strategy (adopted in September 2014), which sets out the broad planning strategy for Rother District up to 2028. The Core Strategy forms part of the statutory Development Plan for the District alongside those saved policies in the Local Plan 2006 not replaced by the Core Strategy. (Superseded 2006 policies are identified in Appendix 1 of the Core Strategy.)

1.3.7 The Core Strategy does not allocate specific sites for development, this is done in a separate document called The Rother Development and Site Allocations (DaSA) Local Plan. The DaSA implements the development strategy and core policies set out in the Rother Core Strategy. In January 2019, the Council submitted the DaSA Local Plan along with supporting documents and the representations received to the Planning Inspectorate for examination on behalf of the Secretary of State.

1.3.8 **Strategic Environmental Assessment**

The Localism Act 2011 requires neighbourhood plans to not breach and be otherwise compatible with EU and Human Rights obligations. It is not the case that every neighbourhood plan will need an environmental assessment of the type normally associated with the process of preparing Local Plan. Neighbourhood Development Plans (BCPNP) may trigger various EU Directives (including the Strategic Environmental Assessment Directive (SEA) and Habitats Directive (HRA)) and may need to undertake additional procedures and assessment depending on the scale and impact of the plan proposals.

- 1.3.9 A Strategic Environmental Assessment (SEA) is a process to identify likely significant effects of a plan or policy on the environment. An SEA provides technical details of likely effects of the proposal and sets out a management and monitoring framework to help mitigate and track any impacts. The SEA focuses on impacts on the natural environment with some limited consideration of human population needs and material assets.
- 1.3.10 Draft neighbourhood plan proposals should be assessed to determine whether the plan is likely to have significant environmental effects and this process is commonly referred to as a screening opinion request. The requirements are set out in the regulations of the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.3.11 Following the submission of a screening opinion for the draft Battle Civil Parish Neighbourhood Plan, Rother District Council (as the responsible authority) had to determine whether or not a full Strategic Environmental Assessment and/or a Habitats Regulations Assessment are required. In accordance with the Regulations, Natural England, Historic England and the Environment Agency were consulted on the findings of the screening report for a five week period.
- 1.3.12 Having regard to the submission and the consultation responses, it is the Council's opinion that the Plan would be likely to have significant environmental effects. On this basis, a Strategic Environmental Assessment is required for the proposed Battle Neighbourhood Plan. With regards to the Habitats Regulations and whether an Appropriate Assessment is required, the Council concludes that the proposed Neighbourhood Plan is not likely to have a significant effect on European designations. See **Appendix F** for the screening opinion determination letter.



SECTION 2: Process Summary

2.1 The Plan Process

- 2.1.1 Neighbourhood Development Plans have been prepared in England since being provided for in the 2011 Localism Act.
- 2.1.2 The Plan preparation process has been led by the Battle Town Council as the ‘qualifying body’ under the Regulations. The preparation of the Plan has been delegated to the BCPNP Steering Group (hereafter referred to as the Steering Group), which is made up of volunteers from the Parish.
- 2.1.3 A summary of the statutory Plan process is as follows:
- ◆ Step 1: Designating neighbourhood area and if appropriate neighbourhood forum
 - ◆ Step 2: Preparing a draft neighbourhood plan or Order
 - ◆ Step 3: Pre-submission publicity & consultation
 - ◆ Step 4: Submission of a neighbourhood plan or Order proposal to the local planning authority and submission publicity & consultation
 - ◆ Step 5: Independent Examination
 - ◆ Steps 6 and 7: Referendum and Making the Neighbourhood Plan or Order (bringing it into force commonly known as adopting the Plan).
- 2.1.4 If a Plan meets the basic conditions and is successful at the independent examination, it is then put to a Parish referendum. A majority vote will lead to the Plan becoming part of the Development Plan for the Parish and is used when determining future development decisions alongside the current Local Planning Authority Local Plan and the National Planning Policy Framework (NPPF 2019).
- 2.1.5 Only a draft Neighbourhood Plan or Order that meets each of a set of basic conditions can be put to a referendum and be ‘made’. The basic conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004.
- The basic conditions are:
- a. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).
 - b. having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Orders.
 - c. having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Orders.
 - d. the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.
 - e. the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
 - f. the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations. Eg. prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).

- 2.1.6 There are other basic conditions that apply to a neighbourhood plan besides those set out in the primary legislation and is in Regulations 32 and 33 of the Neighbourhood Planning (General) Regulations 2012 (as amended):
the making of the neighbourhood plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017, which set out the habitat regulation assessment process for land use plans, including consideration of the effect on habitats sites. (See Schedule 2 to the Neighbourhood Planning (General) Regulations 2012 (as amended) in relation to the examination of neighbourhood development plans.)
- 2.1.7 The Plan has been developed with the community being consulted or kept informed along the way. This stage of the Plan is called the Pre-submission – Regulation 14 statutory stage of the Plan development.
- 2.1.8 Initial consultation and call for potential development sites was sent out to all households, asking for input into the key components of the plan and planning consultants Moles Consultancy was employed to help with the Plan.
A full description of the BCPNP process is included in the Consultation Statement document. A summary of the production of the Plan to date includes the following:
- ◆ Questionnaire to community asking for their input into the key components of the Neighbourhood Plan
 - ◆ The survey of young people of the Civil Parish of Battle
 - ◆ Call for Sites
 - ◆ Land owners presentations
 - ◆ Vision and objectives consultation
 - ◆ Call for sites Community Consultation

2.2 Community Engagement

- 2.2.1 Two-way communication with the local community during the Neighbourhood Development Plan is vital for its success and ultimate support through the referendum. It has been important to engage with the whole community including key stakeholders throughout the process.
- 2.2.2 Communication and consultation, in various forms, played a major role in formulating the Plan and allowing residents and other relevant stakeholders the opportunity to take part in defining the Neighbourhood Development Plan. A full description of the community engagement process is included in the Consultation Statement document.

2.3 Evidence Base Overview

- 2.3.1 Evidence can be both quantitative (facts and figures such as census data) as well as qualitative (e.g. opinions given in consultation responses) and both should be used to support the decision making and the policies that have been developed for the neighbourhood plan.
- 2.3.2 The Government’s planning guidance (para 040) states that: “there is no ‘tick box’ list of evidence required for neighbourhood planning. Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan...”
- 2.3.3 We therefore started with a review of the RDC evidence base used for the Local Plan and then built upon it to address the objectives which were identified. We also reviewed all existing documents and strategies for the Parish and the published statistical information and data including the Office of National Statistics and Census data. Due to the size of these documents, they need to be reviewed separately but have been listed in **Appendix E** of the Plan.

SECTION 3: The Parish Background

3.1 Spatial Characteristics of the Parish

- 3.1.1 The Parish of Battle comprises three distinct parts within the Parish boundary, namely Telham, Battle Town and Netherfield. The village of Netherfield and the hamlet of Telham are separated from Battle Town by agricultural land, some forestry and open spaces. Whilst nearly all areas within the boundary have some historic significance, Battle itself is of national and international importance, with the “Senlac” battle ground, which is protected by English Heritage, the abbey and its market town profile established over many centuries. It also acts as a service centre for a large rural hinterland which stretches far outside its Parish boundary. The entire Parish also falls within the High Weald Area of Outstanding Natural Beauty and retaining the 1970 designated conservation area status is of paramount importance.
- 3.1.2 Within Battle Civil Parish there are two designated (electoral) wards for Rother DC designated wards, North Battle, Netherfield and Whatlington (Whatlington is outside the Civil Parish) and South Battle and Telham.
- 3.1.3 The hamlet of Telham acts as a gateway to both the village of Crowhurst and the larger conurbation of Hastings and St Leonards. Enclosed by agricultural land it services a small community and acts as a green gap in the fight against urban sprawl. As with most hamlets it is somewhat isolated by its economic difficulties.
- 3.1.4 The area classed as Netherfield runs from the bottom of Netherfield Hill, Netherfield Road onto Darwell Hill terminating at Darwell Hole. Houses border the main routes through the village but due to historic associations with British Gypsum an estate was constructed at Darvel Down, which housed the majority of the Mountfield workforce at that time.

3.2 Economy

This area profile provides key characteristics of the local economy.

3.2.1 Economic activity and inactivity in 2011

This dataset shows economic activity and inactivity amongst those aged 16-74 from the 2011 Census.

Economic activity category	All people aged 16-74	All economically active	Employee	Self-employed	Unemployed	Economically active full-time student	All economically inactive	Long-term sick or disabled	Looking after home or family	Retired	Economically inactive student (including full-time students)	Other economically inactive
England and Wales	100.0	69.7	52.2	9.7	4.4	3.4	30.3	4.2	4.3	13.8	5.8	2.2
South East	100.0	72.1	54.2	11.0	3.4	3.3	27.9	2.9	4.4	13.7	5.2	1.8
East Sussex	100.0	68.1	48.2	13.4	3.6	2.8	31.9	4.1	4.2	17.8	4.0	1.8
Rother	100.0	63.4	43.2	14.8	3.2	2.1	36.6	4.1	4.3	22.5	3.8	1.9
Battle	100.0	66.2	45.8	15.3	2.5	2.6	33.8	2.8	4.6	19.6	5.4	1.5

- 3.2.2 A person aged 16 to 74 is described as economically active if, in the week before the census, they were in employment as an employee or self-employed, not in employment, but were seeking work and ready to start work within two weeks, or not in employment, but waiting to start a job already

obtained and available. Full-time students who fulfil any of these criteria are classified as economically active and are counted separately in the 'Full-time student' category of economically active - they are not included in any of the other categories such as employees or unemployed.

3.2.3 A person aged 16 to 74 is described as economically inactive if, in the week before the census, they were not in employment but did not meet the criteria to be classified as 'Unemployed'. This includes a person looking for work but not available to start work within two weeks, as well as anyone not looking for work, or unable to work - for example those who are retired, looking after home/family, permanently sick or disabled. Students who fulfil any of these criteria are also classified as economically inactive. This does not necessarily mean in full-time education and excludes students who were working or in some other way were economically active.

Source: 2011 Census, Office for National Statistics

Unemployment in 2011

3.2.4 This dataset shows the number and percentage of the economically active population, aged 16-74 who were unemployed, by gender, age groups and whether or not they have ever worked and length of unemployment from the 2011 Census.

Unemployment category		All usual residents aged 16 to 74	Percent unemployed aged 16-74	Percent unemployed aged 16-24	Percent unemployed aged 50-74	Percent who are long-term unemployed	Percent who have never worked
Gender	Geography						
All people	England and Wales	41,126,540	4.4	1.2	0.8	1.7	0.7
	South East	6,274,341	3.4	0.9	0.7	1.3	0.4
	East Sussex	374,518	3.6	1.0	0.8	1.5	0.4
	Rother	62,861	3.2	0.9	0.8	1.3	0.4
	Battle	4,590	2.5	0.8	0.7	1.0	0.5
Females	England and Wales	20,735,149	3.5	0.9	0.5	1.5	0.6
	South East	3,168,086	2.8	0.7	0.5	1.2	0.3
	East Sussex	191,970	2.8	0.7	0.6	1.2	0.3
	Rother	32,498	2.5	0.7	0.6	1.1	0.3
	Battle	2,382	2.4	0.6	0.6	1.0	0.4
Males	England and Wales	20,391,391	5.3	1.5	1.1	2.0	0.8
	South East	3,106,255	4.1	1.2	1.0	1.4	0.5
	East Sussex	182,548	4.5	1.3	1.1	1.7	0.6
	Rother	30,363	3.9	1.3	1.1	1.6	0.6
	Battle	2,208	2.6	1.1	0.8	1.0	0.6

Source: 2011 Census, Office for National Statistics

Employment by industry in 2011

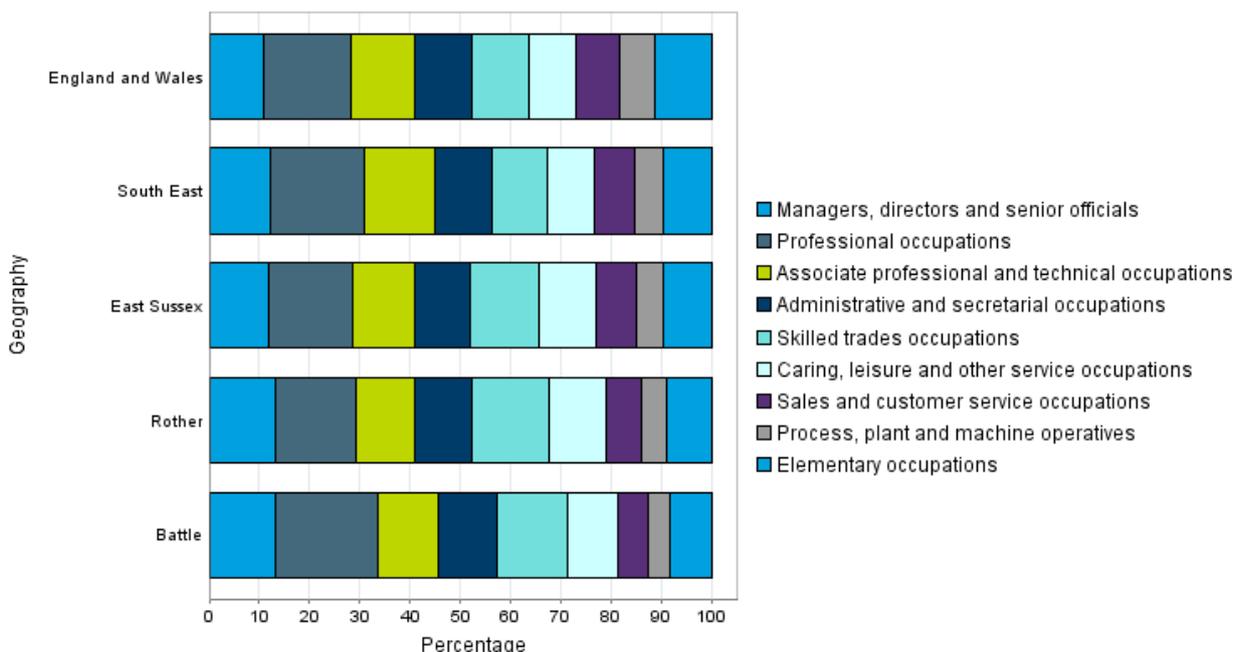
3.2.5 This dataset shows the percentage of people in employment aged 16-74 by industry from the 2011 Census.

Industry	Geography														
	All industries	Agriculture, Mining and Utilities	Manufacturing	Construction	Wholesale and retail trade; repair of motors	Transport and storage	Accommodation and food service activities	Information and communication	Finance, insurance and Real estate	Professional, scientific and technical activities	Administrative and support service activities	Public administration and defence; compulsory social security	Education	Human health and social work activities	Other
England and Wales	100.0	2.3	8.9	7.7	15.9	5.0	5.6	4.0	5.8	6.6	4.9	6.0	9.9	12.5	5.0
South East	100.0	2.1	7.2	8.0	15.6	5.2	5.0	5.5	5.9	7.5	5.2	6.0	10.1	11.6	5.1
East Sussex	100.0	2.1	6.1	9.4	16.0	4.1	5.6	2.9	5.9	6.2	4.5	5.5	10.3	15.6	5.7
Rother	100.0	3.0	5.7	10.1	14.9	3.8	5.6	2.8	6.3	6.6	4.6	5.5	10.0	15.2	5.8
Battle	100.0	2.9	5.6	10.3	12.6	3.2	5.3	2.8	6.6	8.7	4.9	6.2	11.8	14.3	5.0

Source: 2011 Census, Office for National Statistics

Employment by occupation in 2011

3.2.6 This dataset shows the percentage of all people in employment aged 16-74 by occupation from the 2011 Census.



Source: 2011 Census, Office for National Statistics

3.3 Population and households

This area profile provides key characteristics of the local population and households.

Population by age groups in 2011

3.3.1 This dataset shows the resident population by broad age groups from the 2011 Census.

Age	All people	Percent aged 0-14	Percent aged 15-29	Percent aged 30-44	Percent aged 45-64	Percent aged 65+
Geography						
England and Wales	56,075,912	17.6	19.9	20.5	25.4	16.4
South East	8,634,750	17.8	18.6	20.4	26.1	17.2
East Sussex	526,671	16.1	15.9	17.2	28.0	22.7
Rother	90,588	14.6	13.3	14.4	29.3	28.4
Battle	6,673	17.2	14.8	15.1	29.1	23.9

Source: 2011 Census, Office for National Statistics

Population by ethnic group in 2011

3.3.2 This dataset shows the population by ethnic groups from the 2011 Census.

Ethnicity	All people	Percent All White	Percent All Mixed	Percent All Asian or Asian British	Percent All Black or Black British	Percent other ethnic group
Geography						
England and Wales	56,075,912	86.0	2.2	7.5	3.3	1.0
South East	8,634,750	90.7	1.9	5.2	1.6	0.6
East Sussex	526,671	96.0	1.4	1.7	0.6	0.3
Rother	90,588	97.1	1.1	1.2	0.3	0.2
Battle	6,673	97.4	1.1	1.0	0.4	0.1

Source: 2011 Census, Office for National Statistics

Population density and area in hectares in 2011

3.3.3 This dataset shows the area in hectares and also the population density - that is, the number of persons per hectare from the 2011 Census.

Measure	Area in hectares	Density (persons per hectare)
Geography		
England and Wales	15,101,354	3.7
South East	1,906,965	4.5
East Sussex	170,871	3.1
Rother	50,943	1.8
Battle	3,180	2.1

Source: 2001 and 2011 Census, Office for National Statistics

Population in urban and rural areas in 2011

3.3.4 This dataset shows the percentage of people living in urban and rural areas from the 2011 Census. The 2011 rural-urban classification (RUC2011) for small area geographies provides a rural/urban view of datasets at output area (OA), super output area (SOA) and ward level. Data presented here are aggregated from the output area level classification. An output area (OA) is treated as 'urban' if it was allocated to an area with a population of 10,000 or more. The rest is treated as 'rural'.

Urban/Rural	Urban				Rural			
Age group	All people	0-15	16-64	65+	All people	0-15	16-64	65+
Geography								
England and Wales	81.5	82.9	82.4	76.4	18.5	17.1	17.6	23.6
South East	79.6	80.2	80.5	75.7	20.4	19.8	19.5	24.3
East Sussex	74.0	74.2	74.5	72.7	26.0	25.8	25.5	27.3
Rother	47.7	44.1	45.4	54.1	52.3	55.9	54.6	45.9
Battle	0.0	0.0	0.0	0.0	100.0	100.0	100.0	100.0

Source: 2011 Census, Office for National Statistics

3.4 Households

Household composition in 2011

3.4.1 This dataset shows the total number of households and percentage by household type from 2011 Census. A household is defined as one person living alone, or a group of people (not necessarily related) living at the same address who share cooking facilities and share a living room, sitting room or dining area. Household composition here classifies households according to the relationships between householders.

Household sub-type	All households	Percent all one person households	Percent all family households	Percent all other households
Geography				
England and Wales	23,366,044	30.2	61.8	7.9
South East	3,555,463	28.8	63.9	7.4
East Sussex	231,905	32.8	61.2	6.1
Rother	40,877	34.0	60.9	5.1
Battle	2,865	31.5	63.6	4.9

Source: 2011 Census, Office for National Statistics

3.5 Transport

3.5.1 The town of Battle is used as a conduit to facilitate access to a number of industrial complexes on the outskirts of Hastings and St Leonards via the A2100, in addition to its new use as a transport corridor facilitating an approach to the new Hastings – Bexhill Link road (A2690). This has generally increased the problems associated with additional transportation within the confines of our historic town, such as illegal parking and congestion. This has not improved the environment for those living, working or shopping along Battle High Street. There has also been an ongoing problem with coaches associated with the transportation of visitors to the town to access the historic centres, such as the Abbey, which offload their passengers around the Abbey Green in

front of the Abbey, causing additional congestion at most times of the year. Whilst Battle Station is situated a short distance from the High Street, accessing its services is not helped by the distinct lack of public transport within the Parish. The station provides regular services to both London and to St.Leonards Warrior Square and Hastings. Connecting services are available to Ashford, Eastbourne and Brighton from Hastings as well as Gatwick Airport via Tonbridge.

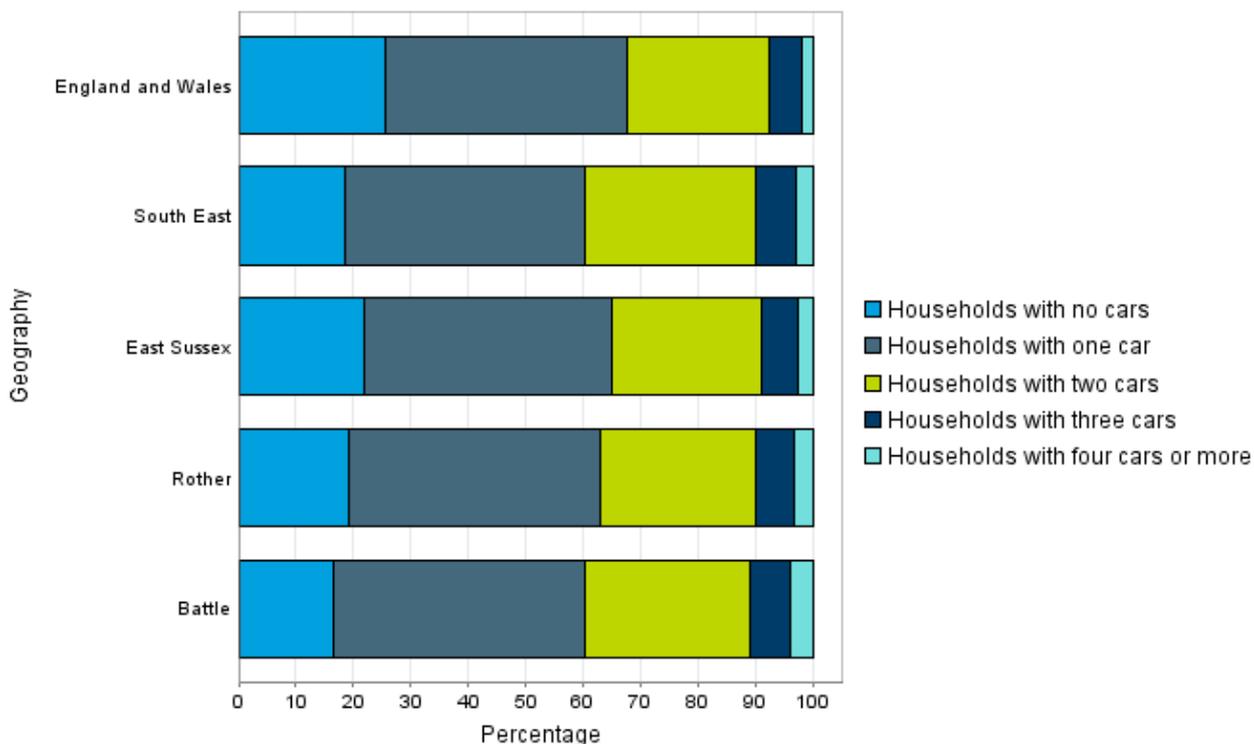
3.5.2 Netherfield, part of which is situated on B2096, Battle to Heathfield Road, suffers from a lack of public transport requiring the constant use of private vehicular traffic to access medical services, recreational facilities and employment, due to its isolation and lack of investment over a considerable period of time. This has resulted in a dramatic increase in the number of households needing 3-4 cars to enable household family members to access a variety of different pursuits at peak periods. The deteriorating state of the highway system around the rural conurbation of Netherfield indicates that a substantial investment would be required to make this village into a rural business hub and therefore an employment hot-spot.

3.5.3 Telham, is situated between Battle and Hastings along the A2100 with additional areas situated along Telham Lane. It boasts a church and a Public House. Public transport plays a greater role in the lives of the local inhabitants but is limited by the poor infrequent bus service to various local destinations. Netherfield has a very limited bus service (twice a day to Battle and Heathfield).

Car ownership

Access to a car in 2011

3.5.4 This chart shows the percentage of households by number of cars or vans owned or available for use by that household.



Source: 2011 Census, Office for National Statistics

Number of cars in 2011

3.5.5 This dataset shows the number of cars or vans, including any company car or van if available for private use, the number of households in the area and the number of cars/vans per household. Also shown is the percentage increase in households, cars and vans, and the number of cars/vans per household since 2001.

Measure	All cars or vans in the area	All households	Number of vehicles per household
Geography			
England and Wales	27,294,656	23,366,044	1.2
South East	4,803,729	3,555,463	1.4
East Sussex	292,118	231,905	1.3
Rother	54,241	40,877	1.3
Battle	4,028	2,865	1.4

Source: 2011 Census, Office for National Statistics

Travel to work

Method of travel to work in 2011

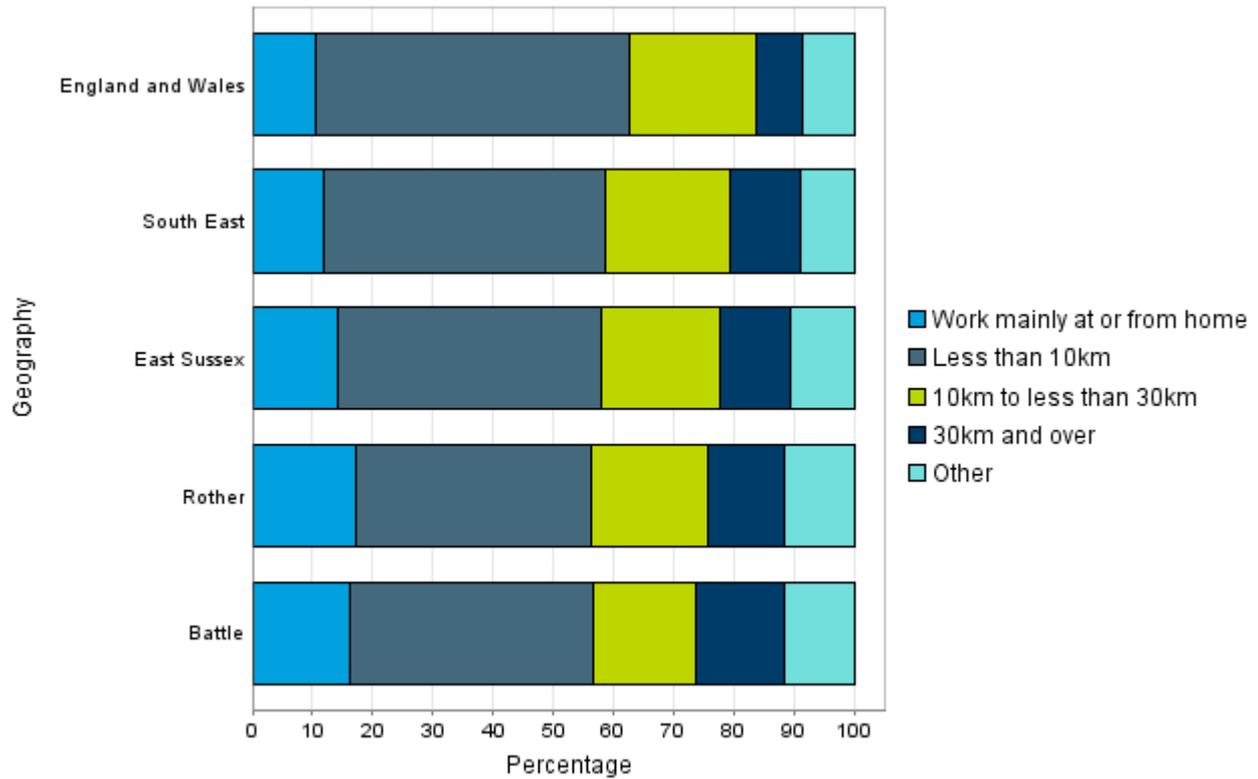
3.5.6 This dataset shows which modes of transport are used by those who are in employment to get to their place of work, by broad transport type. The information in this table has been produced using only people's response to method of travel to work questions in the 2011 Census this data is not comparable with 2001.

Mode of travel to work	All people aged 16-74 in employment	Percentage of people who work at or mainly from home	Percentage of people who use public transport	Percentage of people who use a private vehicle	Percentage of people who walk or cycle	Percentage of people who use another mode of transport
Geography						
England and Wales	26,526,336	5.4	16.4	64.0	13.6	0.6
South East	4,260,723	6.6	12.1	66.8	13.9	0.7
East Sussex	239,319	7.9	11.4	66.8	13.3	0.6
Rother	37,583	9.6	8.9	68.8	12.1	0.7
Battle	2,910	9.2	10.8	67.3	12.4	0.4

Source: 2011 Census, Office for National Statistics

Distance travelled to work

3.5.6 This dataset shows the distance travelled to work by those who are in employment. The information in this table has been produced using both a person's place of work and their method of travel to work and therefore 2011 data is comparable with 2001.



Source: 2011 Census, Office for National Statistics

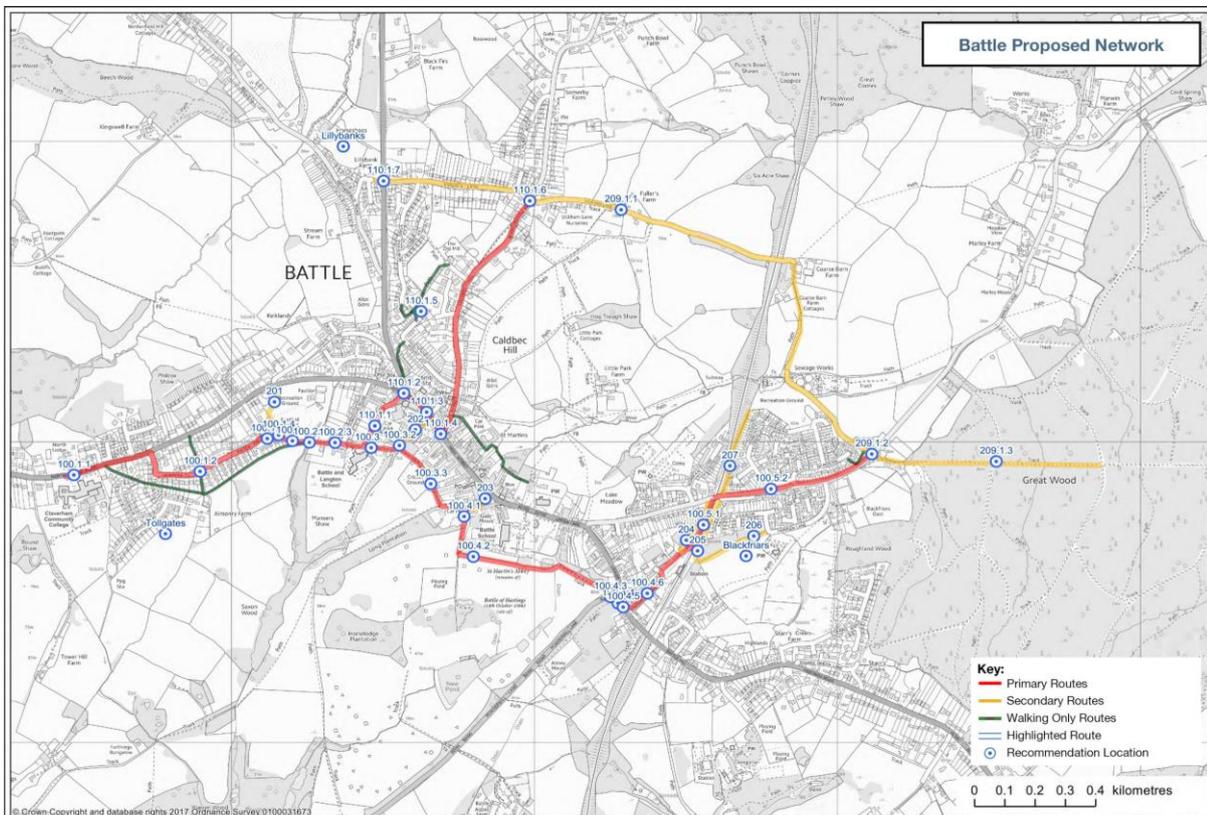


Figure 2 The Battle Walking & Cycling routes plan (above) is kindly provided by East Sussex County Council Transport Policy Unit in advance of publication; it was commissioned by them to identify potential Active Travel routes throughout the county for long term funding.

- 3.5.7 Battle has grown in size over many centuries and is the central character within the Parish of Battle. Like most high streets in the area it runs North to South and is the central hub of not only the Town that bears its name, but also of Telham and Netherfield. Commercial and residential properties co-exist not only on the High Street but throughout the Town. At the Northern end a roundabout exits onto North Trade Road, generally supporting a single row of properties either side of the highway as well as the Battle Recreation ground and Claverham College. The houses back onto the Beech Estate farmland on one side, together with arable and pasture on the other.
- 3.5.8 At the southern end Battle Hill and a similar residential model as that described on North Trade Road exists up to and including the hamlet of Telham.
- 3.5.9 A third of the way along the High Street, the road through to Whatlington is effected along Mount Street, which too has 15th through to the 20th Century architectural properties bordering further farming businesses.
- 3.5.10 The existing conservation area covers all these highlighted sections of the community together with the newer identifiers associated with Telham and Netherfield.

3.6 Conservation Area

3.6.1 Battle Conservation Area was designated in June 1971 by East Sussex County Council. As shown on the map below, the area is dotted with a multitude of listed buildings. Additional details can be found on the Rother District Council website.

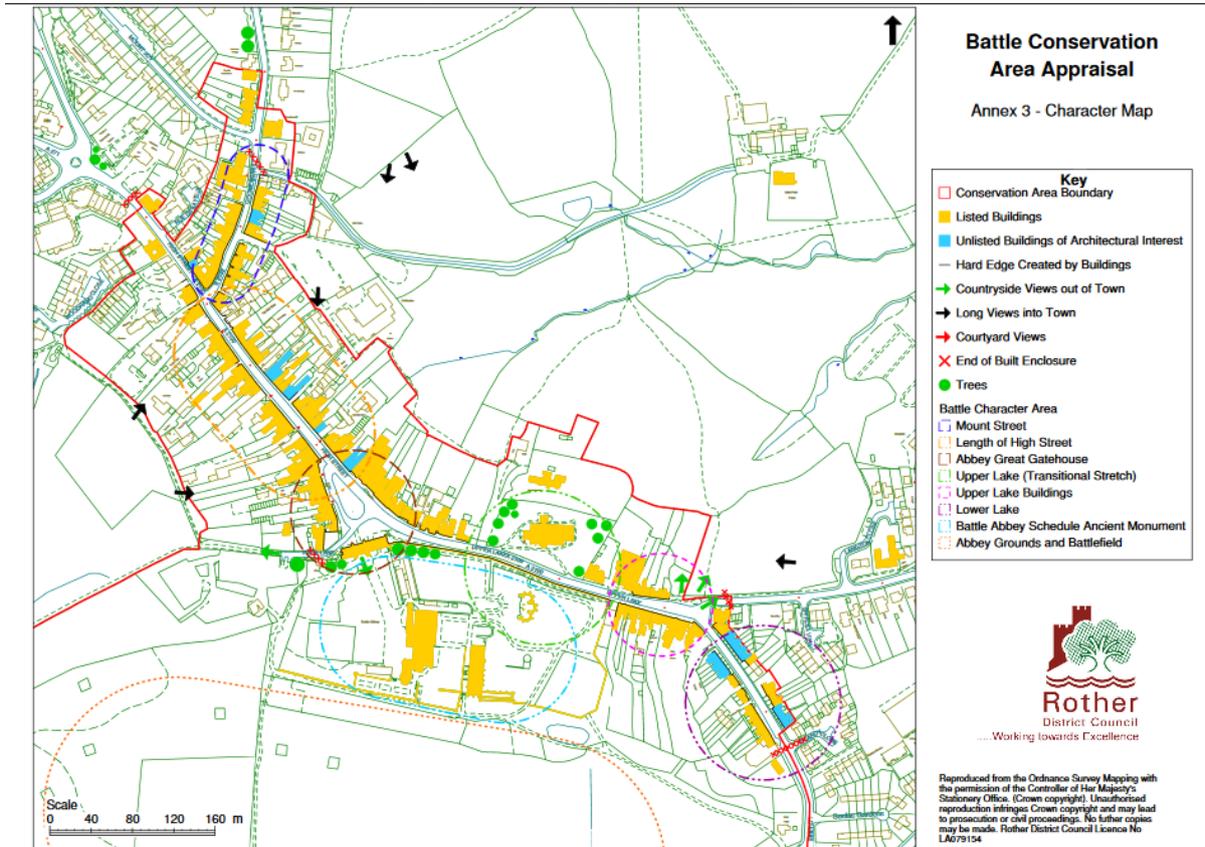


Figure 3: Battle Conservation Area Appraisal

3.6.2 The town centre forms the historic core, and consists of a long central street, High Street, with the Abbey Gate House at its south-eastern end and the mediaeval precincts wall beyond it. The High Street is continued to the south-east in Upper Lake and Lower Lake while to the northwest end of the High Street there is a Y-fork formed by High Street itself and Mount Street. Almost all the buildings in these four streets date from the eighteenth century or earlier. It is this part of Battle which is contained within the designated Conservation Area.

3.6.3 The most northerly section of the Conservation Area is formed by the Mount Street group of properties: 17 to 21 (the Old Court House) together with 72. The boundary then takes the rear line of the properties on the east side of Mount Street to the footpath which runs parallel with the north side of the High Street. St Mary's Church, the Old Deanery and the Church Hall, together with the properties to the east, are then included. The field boundary to the north and the hedge and tree belt to the east are then taken as the boundary, to Marley Lane. At the junction of Marley Lane with Lower Lake, the property Lake House is included. The boundary then follows a south easterly direction to the immediate rear of 1 to 22 Lower Lake before turning across the road and down to include Lake Cottage. The whole of Abbey Grounds and the battlefield are then included in the Conservation Area. From the Western edge of the Long Plantation the boundary then runs parallel to the High Street in a north-west direction along the existing footpaths as far as Western Avenue. The properties on either side of the High Street as far as 37 on the south side and 39 on the north side form the north-western boundary of the Conservation Area, together with the rear of the properties on Mount Street.

3.7 Battle Parish Listed Buildings

- 3.7.1 The modern Parish of Battle has a wealth of evidence for past human activity for all periods from Mesolithic to the present day. This is reflected in the fact that there are three scheduled monuments, 172 listed buildings, one conservation area, one registered park/garden and one registered battlefield. The extensive archaeological interest of the Parish is represented by 29 archaeological notification areas, 434 recorded non-designated heritage assets (including 78 buildings and 38 historic farmsteads as well as other structures and artefacts) and 120 recorded archaeological surveys, watching briefs or archaeological excavations. Collectively this information provides an insight into the occupation of the area by people over the last c.10,000 years.
- 3.7.2 Geologically and topographically the area is defined by two main sandstone ridges which intersect at Caldbec Hill; these have historically been the main ways through the Parish.



3.8 Facilities and Services

- 3.8.1 The Town of Battle provides the majority of facilities and services which sustain the residents of the whole Civil Parish of Battle and entice visitors from the surrounding area. It has sustained a vibrant community not only with its historical heritage but the amenities that it offers.
- 3.8.2 The Battle Memorial Hall, a High Street full of a diverse range of shops, cafes and public houses give residents and visitors alike the facilities they need to make the Town a venue for an evening's entertainment or a place to shop for a variety of goods and services.
- 3.8.3 There are two doctor's surgeries within the Town, one at 36 High Street and one located opposite Battle Station in a modern premises known as Telham House, Station Approach. There is also a Chiropodist and two Dental Surgeries, one along the High Street and another in Mount Street.

- 3.8.4 There are 4 main stream schools within the Town conurbation. The first is Battle and Langton Church of England Primary School, which is situated on Market Road, Battle, Netherfield Church of England Primary School which is situated in Darvel Down, Netherfield; and Claverham Community College, located on North Trade Road, Battle. There is also Battle Abbey School which is an Independent School located within Battle Abbey and one of the top 130 schools in the country.
- 3.8.5 In line with Battle's vibrant outlook on community spirit the Town also boasts an Auction House located at a venue which originally began life as the local cinema for the Town. It is located on Lower Lake in Battle just down the road from one of the two petrol stations which service the town.
- 3.8.6 Battle is on the main railway line between Hastings and London and runs regular services throughout the day and evening to and from Charing Cross and Cannon Street rush-hour services. By travelling southwards to St Leonards Warrior Square and Hastings, Coastway services to Brighton, Eastbourne and Ashford can be accessed. By travelling northwards to Tonbridge, services to north Kent and Surrey (including Gatwick) can be accessed. The Town has a small number of infrequent day-time bus routes to Bexhill, Heathfield, Hawkhurst and Hastings.

3.9 Constraints

3.9.1 The following are the key constraints and can be seen on the maps following:

- Key Services
- Economic Context
- Broadband Speeds
- Roads
- Environmental and habitat Designations
- Historic Environment

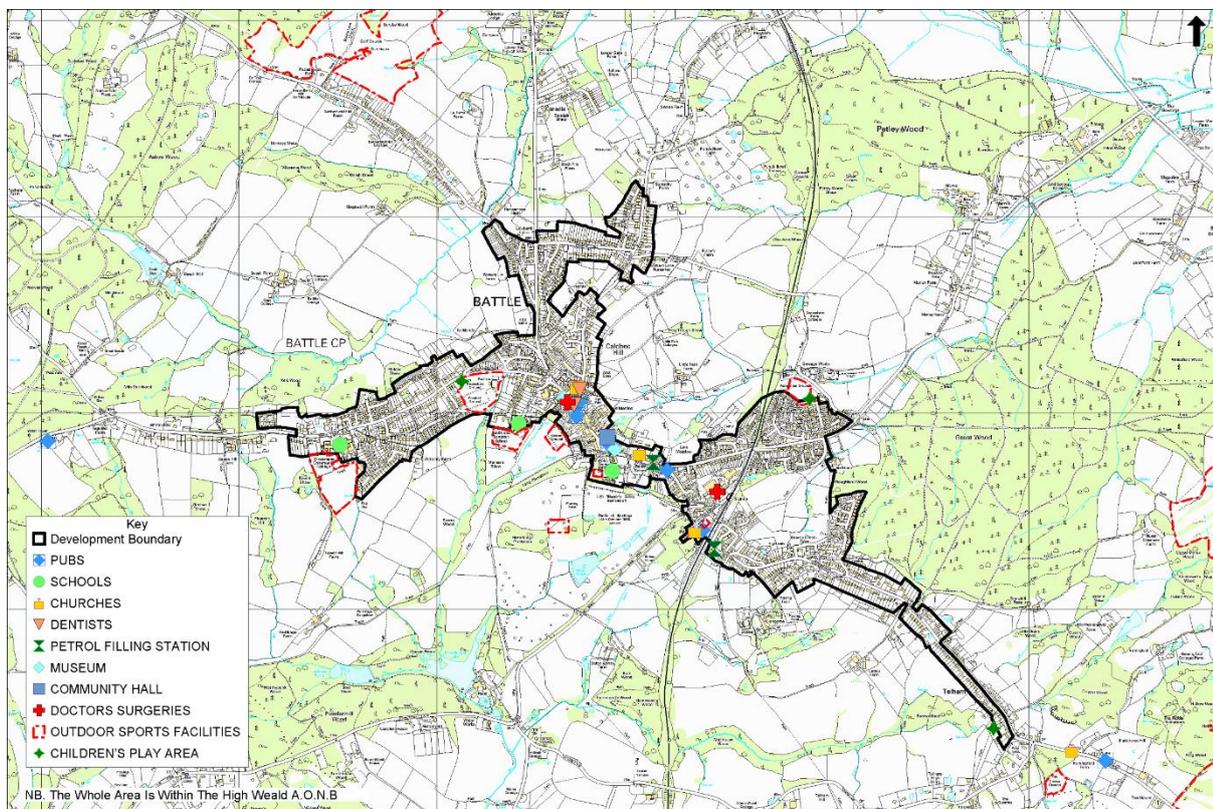


Figure 4:Key Services

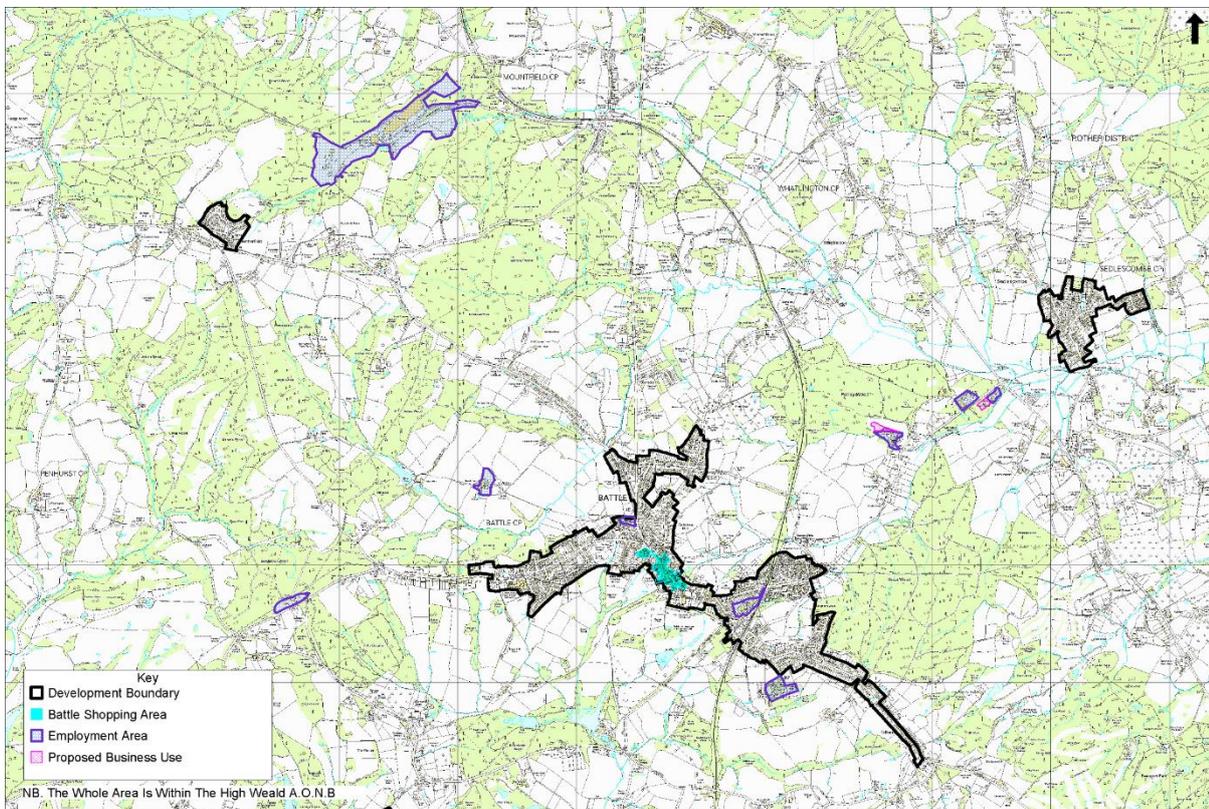


Figure 5: Economic Context

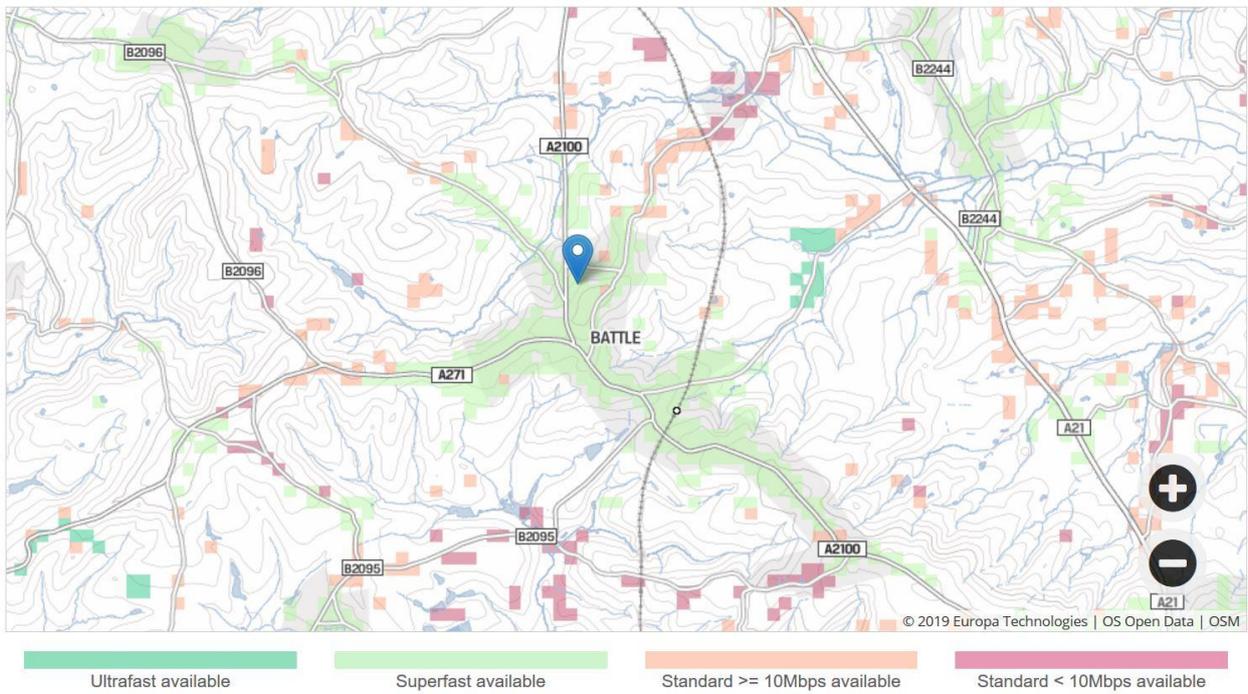


Figure 6: Broadband Speeds

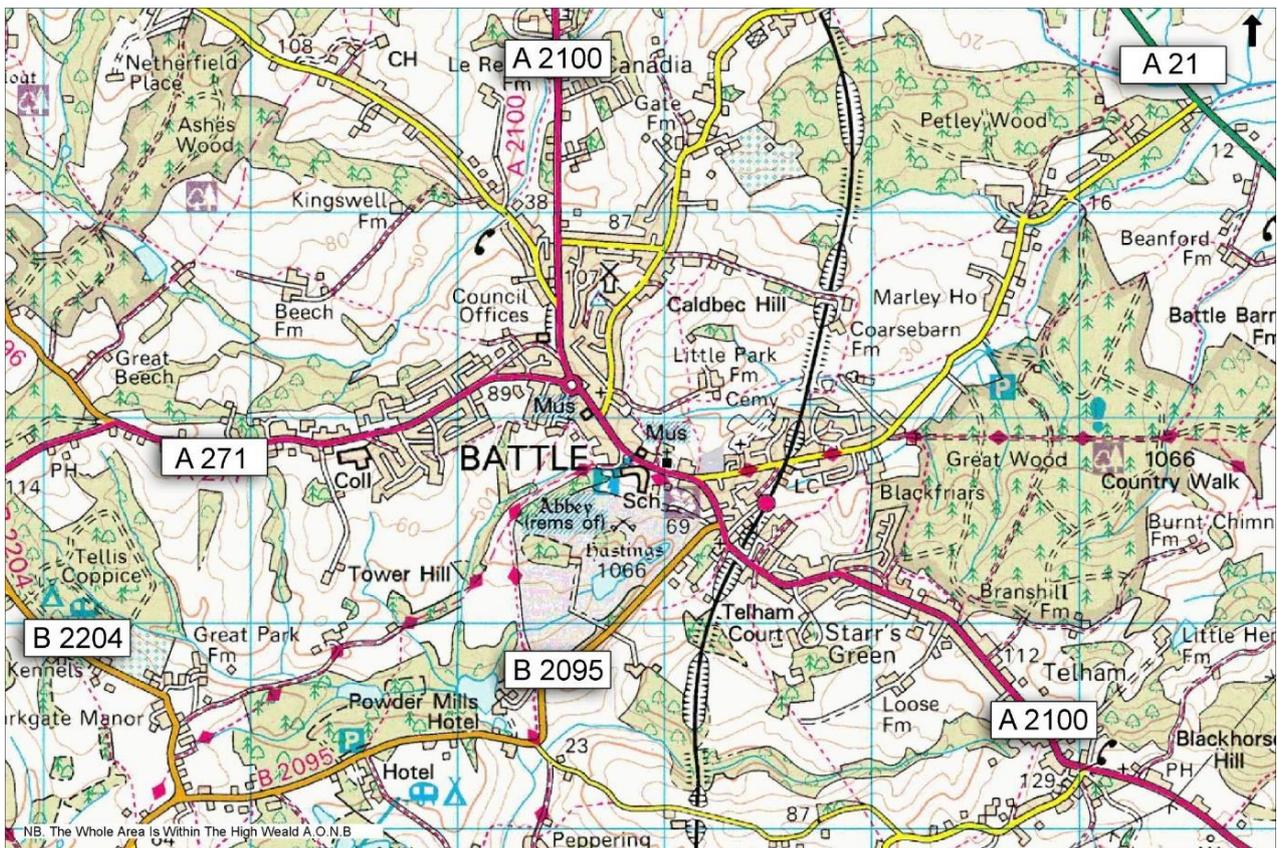


Figure 7: Roads

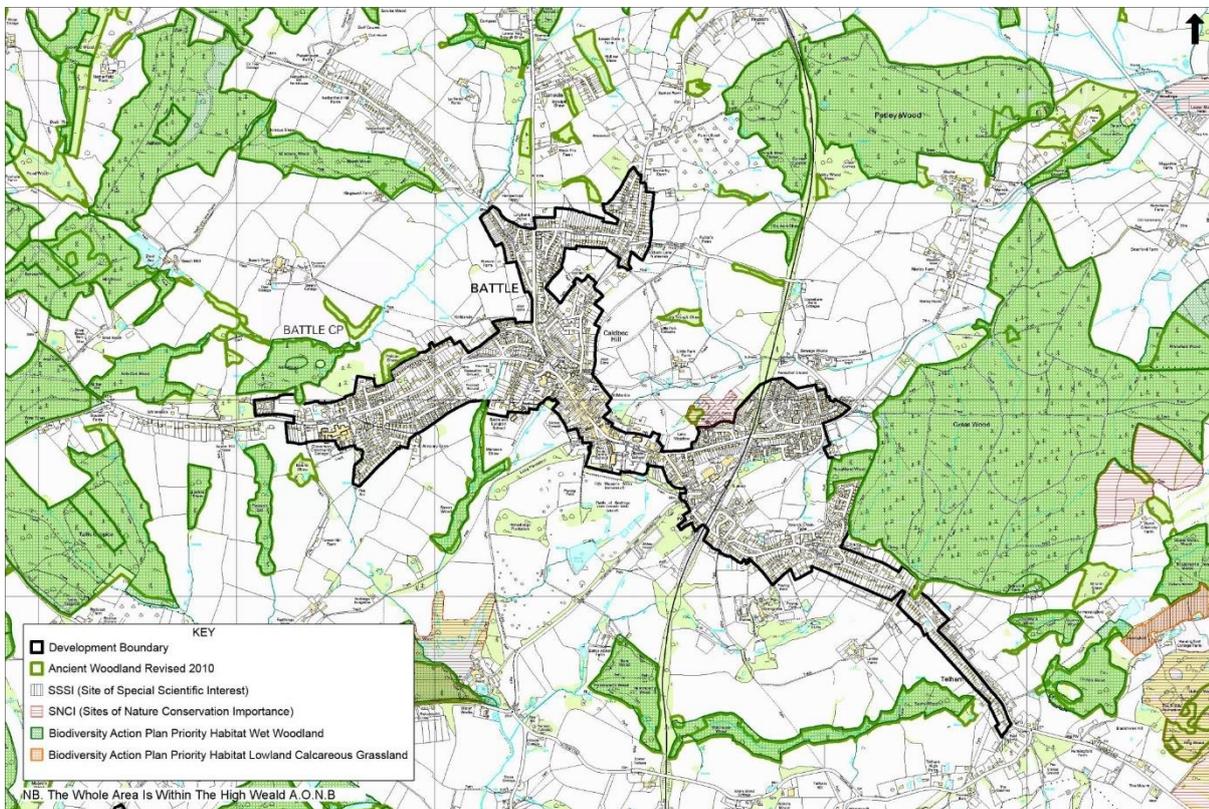


Figure 8: Environmental and habitat Designations

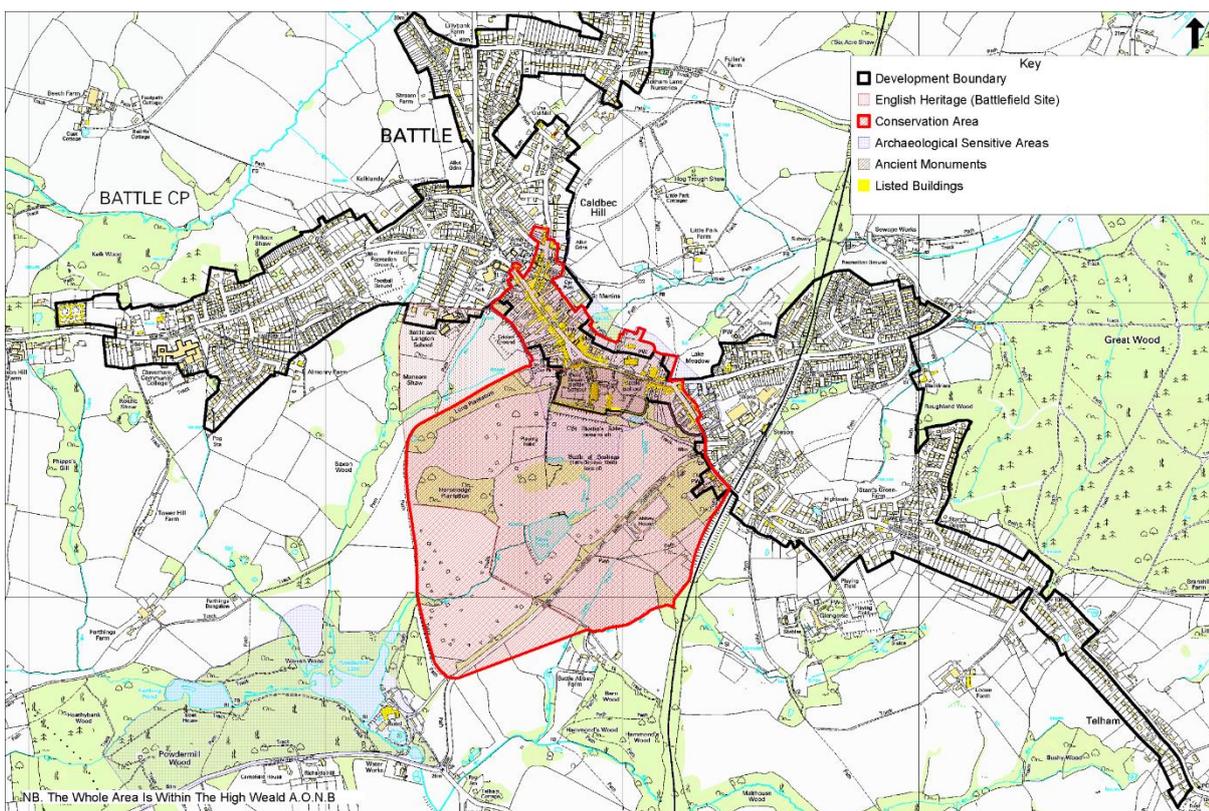


Figure 9: Historic Environment

3.10 SWOT Analysis of Battle

STRENGTHS <ul style="list-style-type: none">➤ Internationally recognised centre of historic value➤ A diverse friendly community➤ Accessibility➤ High quality of built and natural environment	WEAKNESSES <ul style="list-style-type: none">➤ Traffic congestion➤ Parking difficulties and charging➤ Lack of public transport to the rural villages➤ Planning permissions granted in AONB➤ High Rents➤ High cost of heritage asset maintenance➤ Highway maintenance
OPPORTUNITIES <ul style="list-style-type: none">➤ To deliver a range of developments within the Parish which addresses the issues raised by the community as a whole and meets the sustainability housing requirements on mix and types both now and in the future➤ To be instrumental in creating growth and development for the Parish➤ To ensure good design and quality are an integral part of the development programme across the Parish➤ To improve the quality and provision of local parking➤ Address Parish congestion issues➤ To strengthen the historic and heritage aspects of the built and natural environment.➤ Assist in community cohesion projects	THREATS <ul style="list-style-type: none">➤ The imposition of development programmes within the Parish community which do not reflect the needs of the community and reduce the AONB provision as a consequence.➤ Lack of resources to identify ideas and formulate strategies to achieve the vision of the Parish community.

SECTION 4: Vision and Objectives

4.1 Vision

Through a combination of questionnaire surveys, public consultations, email correspondence and meetings with local businesses, the Steering Group were able to collect the views of the Parishioners on what they wished to see for the future of their Parish. For the residents, the four most important aspects they wished the Neighbourhood Plan to address included Farming, Environment and Countryside, Community, Infrastructure and Local Economy, Housing and Development; and Transport and Traffic. Flooding was a major concern which straddled these divisions; and has therefore been included in three of the categories.

- 4.1.2 The vision and objectives herein were presented to both the community and the Town Council as a sound basis for proceeding with the BCPNP. There were various consultation events which informed the vision and objectives.

The Vision for Battle seeks to capture the purpose and aspirations for the whole Parish. It therefore forms the basis on which the objectives and proposed policies will be formulated.

Our Vision Statement is:

The Parish of Battle community, both in the immediate and foreseeable future, wish to create a safe and friendly environment where people want to live, work and play. This goal will be met through engagement with the local community and should directly reflect the community's own views and aspirations. It will secure the future through the formulation of policies and objectives, which not only support sustainability, but also development that enhances and respects the unique historic nature of Battle. These strategies will pay particular attention to the ecological, agricultural, public enjoyment and intrinsic values of the Parish and its countryside.

4.2 Objectives

The Vision is an important statement of what Battle Parish will aspire to overall but more specific objectives are needed to deliver this. The objectives provide a framework to deliver development and other changes that conserve and enhance the sustainability of Battle, in a balanced approach to social, economic, and environmental factors. They reflect the nature of the Parish and the direction the local community wants the Plan to take, especially in securing the long-term future of those community and environmental assets most precious to local people. They also accept and welcome change that will enable the community to grow in a sustainable way. The objectives which seek to address the issues identified have been grouped into themes and will be used to develop the policies that will form the basis of the Plan.

NOTE: The following list of objectives have been identified by the community as the key issues which are important to them. Therefore, those elements which seek to highlight land use issue will be addressed via policies within the Plan and the non-land use issues and therefore outside the scope of the neighbourhood plan policies; will be addressed via community aspirations and community projects.

OBJECTIVE 1: Full Accordance of Residential Development Sites:

The community acknowledges the need for new homes within the Parish of Battle. We are aiming for development sites within the Parish boundaries to reflect, not only the architectural style of the properties nearby, but take full account of the overall spatial aims of the Rother Core Strategy and the aims and needs of the community as a whole. Where possible the desired locations should minimise local impact on outlook, sustainability, environmental and spatial considerations, by robust assessment of all the factors appertaining to the application.

OBJECTIVE 2: Robust Traffic Mitigation Measures:

To require that proper traffic/movement impact study assessments are undertaken for all development proposals within the Parish in order to consider the wider implications and associated costs of traffic movements on the environment and local infrastructure with an overall aim of reduction in the impact of traffic movements.

OBJECTIVE 3: The Maintenance of Green Gaps:

To formulate a policy that not only recognises the separate identities of the village of Netherfield and settlements within the Parish and their unique relationship to Battle Town established over centuries, but enables them to retain those amenity characteristics and prevent urban sprawl through creative solutions within the overall strategic aims of the Core Strategy.

OBJECTIVE 4: Developments should meet the needs and wishes of the community:

Development objectives must reflect the wishes of the community as evidenced from survey results and demonstrable needs identified through forums and exhibitions together with comments received through letters, emails, monthly articles in the local newspaper and Battle Town Council newsletter and meetings from various stakeholders within the Parish of Battle.

OBJECTIVE 5: The Protection of Open Spaces:

Plans must restrict the use of land for development which is primarily already outside of the development boundaries and has been designated as AONB. In addition, information that has been gathered by the Group on a number of identifiable green spaces which have yet to be afforded protected status, but would be lost for the purposes of sport, leisure and agricultural uses if policy decisions were to change within the RDC Strategic Aims, must also be given that protection.

OBJECTIVE 6: Protection of Heritage Assets within the Parish Conurbation:

A community is defined by its most important assets and where there are additional historical attributes attached to those assets no major changes should be allowed that would change the character of the town or other areas of the district which enjoy such history. Whilst this will influence development proposals for historic as well as listed building it reflects the communities wishes and is essentially what attracts the many thousands of tourists to the area every year.

OBJECTIVE 7: Enhance the role of Tourism within the Parish:

Diversity improves the experience of tourism, and thereby increases the number of tourists within the Parish, as it caters for a variety of experiences to be satisfied. One of the aspirational aims within the Neighbourhood Plan is to encourage the placement of public art exhibits around all areas of the Parish. These are being funded by public subscriptions and developer contributions. This initiative will lead to many permanent exhibits within the Parish.

OBJECTIVE 8: The enhancement of Village/Town Centres within the Parish:

The separate communities which make up the Parish of Battle are being encouraged to provide the facilities – whether social, sporting or otherwise – desired by the residents and visitors alike, by careful allocation of the Community Infrastructure Levy monies which shall be used to pump the required funds needed for those facilities. A prime example of this objective is the wish to set up a Health Centre within Netherfield to alleviate the pressure of the Battle surgeries.

OBJECTIVE 9: To alleviate where possible the Traffic Congestion within the Parish:

Battle Town Council will seek to lobby appropriate authorities to address poor parking facilities, volumes and speeding traffic. From the surveys conducted, residents have commented on being concerned about safety measures within the Parish. The Plan seeks to highlight these concerns.

SECTION 5: Neighbourhood Plan Policies

Each policy is numbered and set out in the format of coloured boxes. It is accompanied by a reference to its conformity with the National Planning Policy Framework (NPPF 2019) and the Local Plan where relevant (please note this will be included in the final document). The Local Plan context for this BCPNP is the Rother Local Plan. The final text will include a short explanation of the policy intent and a justification where relevant. There is also a reference to the relevant key evidence base documents which supports the policy.

The policies should be read in conjunction with the evidence base documents. To aid identification, policies have been coded as indicated below.

Policy coding

CODE	POLICY AREA
HD	Housing and Development
IN	Infrastructure
EN	Environment
ET	Economy and Tourism

5.1 Housing and Development

Policy HD1: Development Boundary

The Plan designates a Development boundary as shown on the Development Boundary maps, Refer to **APPENDIX C** to the Plan: **Maps 1 and 2**. All new housing developments should take place within the existing Development Boundary. Any development outside the Development Boundary will be regarded as lying within the Countryside as defined in paragraph 12.47 of the Core Strategy to which RDC policies RA2 and RA3 relate, and therefore will only be permitted provided it complies with provisions of other relevant policies in this Plan and RDC policy documents. Infill development will be considered acceptable within the built-up area subject to the other policies in the development plan.

Conformity list of references

NPPF 2019: Para 23

BCPNP objective: Objective 1: Full Accordance of Residential Development Sites: The community acknowledges the need for new homes within the Parish of Battle. We are aiming for development sites within the Parish boundaries to reflect, not only the architectural style of the properties nearby, but take full account of the overall spatial aims of the Rother Core Strategy and the aims and needs of the community as a whole. Where possible the desired locations should minimise local impact on outlook, sustainability, environmental and spatial considerations, by robust assessment of all the factors appertaining to the application.

Key Evidence base reference: Character Appraisal report and Action in Rural Sussex 2016 Parish Survey (AiRS).

5.1.1 Policy intent: This policy establishes the key spatial priority for the Plan. It sets the policy direction for all its other policies by steering new development into the established settlement in the Parish, by continuing to exert strong control over development proposals elsewhere in the countryside areas of the Parish. The definition of the development boundary has particular significance in relation to the location of housing but is also relevant to the location of other new development.

Policy HD2: Site Allocations

The housing requirement for Battle up to 2028 is 475 dwellings in Battle and 48 dwellings in Netherfield, as allocated by Rother District Council Core Strategy 2014. This includes the housing requirement that will be met by the Blackfriars site (BA11)/ Tollgates & Lillybank developments and other smaller developments given Planning Permission since 2011. The outstanding number of dwellings for Battle is 18 (assuming 220 dwellings at Blackfriars) and for Netherfield it is 23 as of 1st April 2019. New housing development will be required to ensure that local infrastructure is provided and/or improved in relation to the size and scale of the development proposed. This requirement will apply to all infrastructure, and with particular attention to education provision, flood prevention (fluvial and surface water) and car parking/congestion in the Parish.

The Neighbourhood Development Plan supports this requirement and seeks to allocate the following sites for residential development in the following priority order:

Netherfield

- NE NS102 (part of NE06) White House Poultry Farm: **23 dwellings**
- NE05a and NE05r Swallow Barn off B2096: **10 dwellings**

Battle and Telham

- BA31a Glengorse: **20 dwellings**
- BA36 Land at Caldbec House, Caldbec Hill: **9 dwellings**
- BA NS117 Land east of & adj to Cherry Gardens Allotments & Mount Street car park: **16 dwellings**
- BA NS118 Land to the NE of Cedarwood Care Home: **4 dwellings**
- BA NS103 Land to the east of Battle (west of Great Wood) Marley Lane: **2 dwellings**
- BA11 Blackfriars: **220 dwellings**

The Plan designates these sites for housing development as shown on the Proposals maps, Refer to **APPENDIX C** to the Plan: **Maps 3 and 4**.

Any sites that are allocated in Battle Civil Parish will be subject to compliance with other relevant policies in the development plan.

The sites will be in agreement with the site owner and RDC and subject to the following criteria:

1. the provision of a range of house types and in accordance with Policy HD1 and Policy HD3 of this Plan;
2. the provision of an appropriate accessible green space within the site;
3. the provision of an appropriate access into the site and thereby ensuring the minimisation of additional traffic problems in the Parish and creating links by foot and cycle to the surrounding countryside;
4. the introduction of sympathetic landscaping **and**
5. the implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been submitted by the applicant and approved in writing by Rother District Council.

Conformity list of references

NPPF 2019: Paras. 8-14 and 68, 69 and 78

BCPNP objective: Objective 1: Full Accordance of Residential Development Sites: The community acknowledges the need for new homes within the Parish of Battle. We are aiming for development sites within the Parish boundaries to reflect, not only the architectural style of the properties nearby, but take full account of the overall spatial aims of the Rother Core Strategy and the aims and needs of the community as a whole. Where possible the desired locations should minimise local impact on outlook, sustainability, environmental and spatial considerations, by robust assessment of all the factors appertaining to the application.

RDC policy: potentially reflected in policies OSS1 and RA1

Key Evidence base reference: Character Appraisal report, AECOM Site Assessments, AECOM Design Guidelines and Action in Rural Sussex 2016 Parish Survey (AiRS).

5.1.2 Policy intent: This policy seeks to contribute to the achievement of sustainable development by meeting the housing needs which have been tested in the Rother Plan.

It is proposed to allocate sites in order of the priority shown in the first column in the tables in the document Preferred Sites List to meet the actual requirement for dwellings after the capacity of Blackfriars BA11 has been confirmed. Any unallocated sites will be a contingency reserve to be set against any future changes made in the RDC housing allocation or Blackfriars. The priority order in Netherfield shows one preferred and one reserve site. Any unallocated sites will be a contingency reserve to be set against any future changes made in the RDC housing allocation.

The policy identifies the sites for residential development. Infill development will be considered acceptable within the built up area, subject to the provisions of this Plan, the RDC CS and other material planning considerations. Additional allocations will only be made if the identified housing sites do not proceed and the Battle Civil Parish Neighbourhood Plan will be reviewed at least every 5 years to ensure deliverability of the allocations.

The position relating to the published Housing Land Supply at Battle as at 1st April 2019 was as follows :-

Area	Target	Completions (01/04/11 - 31/03/19)	Permissions (01/04/19)		Allowances (01/04/24 - 31/03/28)		Residual requirements
			Small sites	Large sites	Small site windfalls	Exception sites	
Battle	475	34	33	158	12	N/A	238

The outstanding requirement for Battle is 238 (not including Blackfriars), as above.

The figure for Netherfield is 23, as before.

Settlement	Core Strategy Large Site Requirement	Large Site Completions (01/04/13 - 30/10/18)	Large Site Permissions (01/10/18)	Residual requirements
Netherfield	48	0	25	23

NOTE: These figures were provided by RDC as at 1 April 2019.

The current residual housing allocation for Battle stands at 18 dwellings (assuming 220 dwellings at Blackfiars) **and for Netherfield at 23 dwellings as at 1 April 2019.**

There is no minimum number of net dwellings for a site to count towards the Battle total. This is not the case for Netherfield however. In line with the Core Strategy, small site completions and commitments do not count towards the individual village targets as there is an overall windfall allowance figures for the Rural Areas as a whole. Therefore the minimum number of dwellings on a site for it to be counted towards the Netherfield target would be 6 (net).

Policy HD3: Housing mix

Housing developments within the Development boundary of Battle will be permitted where they include a range of house types, including a proportion of affordable housing and shared ownership flats. Housing developments will also be expected to include an element of single level dwellings and, where practicable, sheltered accommodation to meet the needs of the elderly and people with disabilities, thus enabling them to remain independent and within the community for as long as is possible.

Conformity list of references

NPPF 2019: Para 61 and 69

BCPNP objective: Objective 1: Full Accordance of Residential Development Sites: The community acknowledges the need for new homes within the Parish of Battle. We are aiming for development sites within the Parish boundaries to reflect, not only the architectural style of the properties nearby, but take full account of the overall spatial aims of the Rother Core Strategy and the aims and needs of the community as a whole. Where possible the desired locations should minimise local impact on outlook, sustainability, environmental and spatial considerations, by robust assessment of all the factors appertaining to the application.

RDC policy:

Key Evidence base reference: Character Appraisal report, AECOM Site Assessments and AECOM Design Guidelines.

5.1.3 Policy intent:

The Framework sets out that at least 30% of homes on major sites should be affordable with exemptions for Build to Rent, purpose built elderly or student accommodation, self-build or wholly affordable proposals to provide a majority of 2 -3 bedroom dwellings.

The definition of Affordable Housing has been broadened, to include affordable housing for rent, starter homes (as defined under Sections 2 and 3 of the Housing and Planning Act 2016), discounted market sales of at least 20% below market value and other shared equity or 20% below market value schemes.

Policy HD4: Quality of Design

Proposals for all forms of new development must plan positively for the achievement of high quality and inclusive design, at the same time demonstrating they have sought to conserve local distinctiveness and the aesthetic qualities of traditional rural settlements and buildings found in the conservation areas and their setting. Applications proposing unsympathetic designs which fail to respect the connections between people and places, or are inappropriate to its location, or pay inadequate regard to existing density, scale, massing, landscape and biodiversity considerations will be refused. Applications must give priority to the use of local vernacular building materials. The Battle Character Appraisal (see evidence base) and Design Guide document will be used as a reference to assess the impact of the proposals.

Conformity list of references

NPPF 2019: Paras. 124-131

BCPNP objective: Objective 1: Full Accordance of Residential Development Sites: The community acknowledges the need for new homes within the Parish of Battle. We are aiming for development sites within the Parish boundaries to reflect, not only the architectural style of the properties nearby, but take full account of the overall spatial aims of the Rother Core Strategy and the aims and needs of the community as a whole. Where possible the desired locations should minimise local impact on outlook, sustainability, environmental and spatial considerations, by robust assessment of all the factors appertaining to the application.

RDC policy: Policy EN3 and associated “design principles” in Appendix 4, Paras EN1 - 5

Key Evidence base reference: Character Appraisal report, AECOM Design Guidelines, The High Weald AONB Design Guide and Action in Rural Sussex 2016 Parish Survey (AiRS).

5.1.4 Policy intent: This attention to detail will ensure that development and materials respect the local character and location.

Design quality should be considered throughout the evolution and assessment of individual proposals and applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot. Permission should be refused for development of poor design and Local Planning Authorities are required to ensure that the quality of approved development is not diminished after planning permission has been granted, with explicit examples given of changes to details such as the materials used.

Policy HD5: Integration and protection of landscaping

The design of new landscape features will happen at an early stage in the design process to ensure they are well integrated into new developments. New development proposals will have considered and correctly interpreted the landscape character of their location so as to produce the most appropriate design solution for the development. Landscape schemes should therefore:

- Integrate new development sympathetically with its surroundings
- Enhance the setting of new buildings
- Create a high quality environment in which to live and work
- Promote quality landscape schemes which are sensitive to the locality and provide local distinctiveness
- Protect all strategic gaps identified by Rother District Council and Green gaps identified by the BCPNP.

Developers will be required to submit a landscape scheme to accompany all major development proposals and for the majority of smaller developments, particularly those in sensitive locations, in strategic gaps or adjacent to the AONB.

(The definition of major development is defined by the Government as a housing development of 10 or more dwellings or a site area of more than 0.5 hectares.)

Conformity list of references

NPPF 2019: Paras. 127, 153 and 170

BCPNP objective: Objective 3: The Maintenance of Green Gaps: To formulate a policy that not only recognises the separate identities of the village of Netherfield and settlements within the Parish and their unique relationship to Battle Town established over centuries, but enables them to retain those amenity characteristics and prevent urban sprawl through creative solutions within the overall strategic aims of the Core Strategy.

RDC policy: Rother District Core Strategy Policy EN1 (Landscape Stewardship)

Key Evidence base reference: Character Appraisal, AECOM Design Guidelines and Green Gap/Strategic Gap Analysis.

5.1.5 Policy intent: The policy is intended to encourage developers to think about the landscaping as integral to the design.

Policy HD6: Local Connection

Affordable housing delivered as part of policies HD6 and HD7 will be subject to planning conditions and/or planning obligations to require the first and subsequent occupants to be existing residents of Battle, with a Battle connection, meeting one of the following categories:

1. The applicant or their partner are currently living in the Battle Parish and have lived in Battle permanently for at least 5 years immediately prior to the application date; or are currently living in the Parish and have lived permanently in Battle for 10 years out of the last 15 years
2. The applicant or their partner has worked on a full or part time basis (at least 24 hours per week) in the Parish for the past 2 years and remains in employment in Battle.
3. The applicant or their partner needs to be in Battle Parish to give or receive regular daily support from or for a close relative (parents, adult children, brother and/or sister). This support must be required on an ongoing long term basis and cannot be provided by other family members or available support agencies. The family member must be permanently resident in Battle and have lived there permanently for at least 10 years immediately prior to the application date.

Conformity list of references

NPPF 2019: Para 68

BCPNP objective: Objective 4: Developments should meet the needs and wishes of the community: Development objectives must reflect the wishes of the community as evidenced from survey results and demonstrable needs identified through forums and exhibitions together with comments received through letters, emails, monthly articles in the local newspaper and Battle Town Council newsletter and meetings from various stakeholders within the Parish of Battle.

RDC policy: Rother District CS policy LHN1 &2

Key Evidence base reference: Action in Rural Sussex 2016 Parish Survey (AiRS), Feedback from 2017 consultation “Have your say” and Feedback from 2019 consultation.

- 5.1.6 Policy intent:** Evidence gained through the Parish wide Survey indicates a requirement for local homes to enable local people to stay in the Parish. NPPG para 74 allows neighbourhood plans to contain a distinct local approach to that set out in strategic policy and this is being used to try to ensure that the local community has the best possible chance to benefit from new affordable homes.

Policy HD7: Integration of New Housing

Proposals for new housing must ensure that the new homes are well connected to the surrounding area and visually integrated with their surroundings.

Conformity list of references

NPPF 2019: Para 68

BCPNP objective: Objective 4: Developments should meet the needs and wishes of the community: Development objectives must reflect the wishes of the community as evidenced from survey results and demonstrable needs identified through forums and exhibitions together with comments received through letters, emails, monthly articles in the local newspaper and Battle Town Council newsletter and meetings from various stakeholders within the Parish of Battle.

RDC policy: Rother District CS policy LHN1 &2

Key Evidence base reference: Action in Rural Sussex 2016 Parish Survey (AiRS), Feedback from 2017 consultation “Have your say” and Feedback from 2019 consultation.

- 5.1.7 Policy intent:** Evidence gained through the Parish wide Survey indicates that it is important that any new housing is fully integrated to the community and its shops and facilities.

Policy HD8: Protection of the Green Gaps between Settlements

The Plan designates the areas identified in **APPENDIX D** as Green Gaps in order to protect the separation of Battle from surrounding villages so that their individual characters are protected. Within these Green Gaps, development will be carefully controlled. Developments will only be supported where they are unobtrusive and do not detract from the openness of the area having regard to the particular objectives of the Gaps:

- (i) To maintain the separate identity and distinctiveness between settlements;
- (ii) To maintain the strategic settlement pattern; and
- (iii) To prevent the coalescence of settlements.

Enhancement of the Gaps through effective landscape management which strengthens and reinforces their significance as protected landscape areas will be supported.

Conformity list of references

NPPF 2019: Paras. 127, 153 and 170

BCPNP objective: Objective 3: The Maintenance of Green Gaps: To formulate a policy that not only recognises the separate identities of the village of Netherfield and settlements within the Parish and their unique relationship to Battle Town established over centuries, but enables them to retain those amenity characteristics and prevent urban sprawl through creative solutions within the overall strategic aims of the Core Strategy.

RDC policy: Core Strategy Policy OSS2- Use of Development Boundaries, Policy RA3 – Landscape Stewardship

Key Evidence base reference: Green Gap / Strategic Gap Analysis and Development and Site Allocations (DaSA) Strategic Gap Background Paper (Rother District Council) March 2016 and Updated Strategic Gap Paper (Rother District Council) July 2019.

5.1.8 Policy intent: Although the land outside the settlement boundaries is already classified as countryside, which offers some form of policy protection from development and is also protected by being within an area of the highest level of landscape protection, evidence gained through the Parish wide Survey indicates that it is important to protect the strategic gaps to maintain the separate identities of surrounding villages and Battle.

The RDC definition of strategic gap (SG) is ‘an area of land which helps determine the separation of settlements and protect their individual character’.

This green gap policy would afford extra protection from risk of coalescence between Battle and the surrounding villages.

5.2 Infrastructure

Policy IN1: Traffic mitigation

Applications for all new development must provide a traffic impact assessment and demonstrate how the proposed development will improve, or at least maintain, traffic calming and not be detrimental to existing safety measures and reduce the impact of traffic movements.

Conformity list of references

NPPF 2019: Para 72 and 81

BCPNP objective: Objective 2: Robust Traffic Mitigation Measures: To require that proper traffic/movement impact study assessments are undertaken for all development proposals within the Parish in order to consider the wider implications and associated costs of traffic movements on the environment and local infrastructure with an overall aim of reduction in the impact of traffic movements.

RDC policy: TR1 and TR4

Key Evidence base reference: Action in Rural Sussex 2016 Parish Survey (AiRS) and Parish Analysis.

5.2.1 Policy intent: The Parish survey identifies traffic has a major impact on the Parish and therefore the policy intends to get development to consider how traffic could be mitigated as part of any site being developed.

Policy IN2: Maintain and improve existing infrastructure

New and/or improved infrastructure, including utility infrastructure, will be encouraged and supported in order to meet the identified needs of the Parish, subject to the following criteria:

1. the proposal would not have significant harmful impacts on the amenities of surrounding residents and other activities;
 2. the proposal would not have significant harmful impacts on the surrounding local environment;
- and**
3. the proposal would not have significant impacts on the local road network.

Conformity list of references

NPPF 2019: Para 72 and 81

BCPNP objective: Objective 9: To alleviate where possible the Traffic Congestion within the Parish: Battle Town Council will seek to lobby appropriate authorities to address poor parking facilities, volumes and speeding traffic. From the surveys conducted, residents have commented on being concerned about safety measures within the Parish. The Plan seeks to highlight these concerns.

RDC policy: TR1 and TR4

Key Evidence base reference: Action in Rural Sussex 2016 Parish Survey (AiRS) and Parish Analysis.

5.2.2 Policy intent: infrastructure requirements is a significant aspect of any proposal and this policy seeks to encourage provision of infrastructure for the community where needed.

Policy IN3: Parking and new development

Car Parking should where possible be accommodated within the curtilage of the dwelling in the form of a garage and/or parking space. Development proposals will be supported only if they include the maximum level of off street parking consistent with the current local standards. Developments that reduce the amount of off-street parking currently available will only be supported if they make enforceable provision for equivalent off-street parking nearby. Parking spaces provided in connection with such proposals will be required to be made available in perpetuity.

Conformity list of references

NPPF 2019: Paras 36/39/40 Section 4 and 102

BCPNP objective: Objective 9: To alleviate where possible the Traffic Congestion within the Parish: Battle Town Council will seek to lobby appropriate authorities to address poor parking facilities, volumes and speeding traffic. From the surveys conducted, residents have commented on being concerned about safety measures within the Parish. The Plan seeks to highlight these concerns.

RDC policy: 18.33, policies TR1 and TR4

Key Evidence base reference: Action in Rural Sussex 2016 Parish Survey (AiRS) and Parish Analysis.

5.2.3 Policy intent: New development must seek to ensure that routes are kept clear to allow the free flow of traffic but also designed to ensure pedestrian safety. The way in which car parking is designed into new residential development will have a major effect on the quality of the development.

Where parking cannot be provided in-curtilage, the following principles should be incorporated:

- rear parking areas should be kept small and serve no more than six homes so that there is a clear sense of ownership
- avoid large parking courts to the rear of dwellings
- design parking into courts and mews to the fronts of dwellings, where the spaces can form not only a functional space for cars but an attractive setting for the buildings
- include some on-street parking for visitors and deliveries.

5.3 Environment

Policy EN1: Local Green Space Designations

The Plan designates the locations described in **Schedule 1** and shown on **Maps 4 and 5** (Refer to **ANNEX C** to the Plan) as Local Green Spaces under the Neighbourhood Plan in accordance with paragraph 100 of the NPPF 2019. Proposals for any development on the land will not be allowed other than in very special circumstances or if it is essential to meet necessary utility infrastructure needs and no alternative feasible site is available. There will be a presumption against development on these sites under the Neighbourhood Plan.

The sites being designated as Local Green Space are:

NETHERFIELD SITES:

Ref. No.	Green Space Name
NE GS01	Children’s Play equipment area, Darvel Down
NE GS02	Village Green, Darvel Down / B2096 opposite shop [NE 07]
NE GS03	Green space, Netherfield Road
NE GS04	Recreation Ground, off Netherfield Road
NE GS05	Green space in front of school, Darvel Down south-east
NE GS06	Estate green space opposite school, Darvel Down east, middle
NE GS07	School playing field, east of Darvel Down

BATTLE AND TELHAM SITES:

Ref. No.	Green Space Name
BA GS01	Netherfield Hill Allotments (8 plots), off Beech Close
BA GS02	Watch Oak Allotments (26 plots), Chain Lane
BA GS03	Virgins Croft Allotments (14 plots), off Virgins Lane
BA GS04	Kingsmead Open Space – two interconnected fields, between Virgins Lane and Caldbec Hill
BA GS05	Green Space (roadside and including north-western footway and hedge/trees), Caldbec Hill, Whatlington Road (summit)
BA GS06	Claverham College, playing fields, off North Trade Road
BA GS07	Recreation Ground (includes Children’s Play equipment areas), North Trade Road
BA GS08	Teaching & Education Centre (includes grass area with seat overlooking roadway & skateboard ramp), off A2100 – east of “TenSixtySix roundabout”
BA GS09	Battle & Langton CE Primary School, additional field, south of school compound
BA GS10	Mansers Shaw and Amenity Field & adjacent to 1066 Country Walk
BA GS11	Guild Shaw, off Western Avenue
BA GS12	George Meadow and Upper Stumblets including cricket ground (includes field further south-west – not mapped), off Park Lane, west of the High Street
BA GS13	The Abbey “Green” (English Heritage), High Street
BA GS15	Cherry Gardens Allotments (40 plots), off Mount Street – via FP31a/track to Little Park Farm
BA GS16	Lake Meadow (National Trust), adjacent to Marley Lane
BA GS17	Recreation Ground (includes Children’s Play equipment area), Coronation Gardens
BA GS18	Recreation Ground (includes Children’s Play equipment area), off Hastings Road, Telham
BA GS19	Green Space, Telham, west side of A2100, Hastings Road/Telham Lane junction
BA GS 20	Green space with Heritage Trail marker/seat, beside Marley Lane
BA GS 23	Cemetery, off Marley Lane
BA GS 25	“TenSixtySix roundabout” with Battle Memorial sculpture, junction of A2100, London Road and North Trade Road
BA GS 28	Green Space, Hastings Road, trees & daffodils planting, South side - east of Glengorse junction

The Battle Local Green Space document (see evidence base) will be used as a reference.

Conformity list of references

NPPF 2019: Paras. 99 and 100

BCPNP objective: Objective 5: The Protection of Open Spaces: Plans must restrict the use of land for development which is primarily already outside of the development boundaries and has been designated as AONB. In addition, information that has been gathered by the Group on a number of identifiable green spaces which have yet to be afforded protected status, but would be lost for the purposes of sport, leisure and agricultural uses if policy decisions were to change within the RDC Strategic Aims, must also be given that protection.

RDC policy: Policies CO3 and EN5 provide context; envisage proposals via Site Allocations or Neighbourhood Plans

Key Evidence base reference: Local Green Space Analysis and Action in Rural Sussex 2016 Parish Survey (AiRS)

- 5.3.1 Policy intent:** Local Green Space designation is a way to provide special protection against development for green areas of particular importance to local communities. Although most of the Parish is in the AONB, the designation gives those sites additional local benefit.

Policy EN2: Natural environment

Planning permission will not be granted where development would result in an unacceptable loss, or damage to, hedges, ditches, verges, trees and green spaces during or as a result of development unless the benefits of the proposed development outweigh the amenity value of the trees or hedgerows in question. Wherever possible development proposals must be designed to retain trees or hedgerows of good arboricultural and/ or amenity.

Development proposals must be designed to retain hedges, ditches, verges, trees and green spaces of good arboricultural and/or amenity wherever possible.

The Battle Character Appraisal (see evidence base) will be used as a reference to assess the impact of the proposals.

Conformity list of references

NPPF 2019: Conserving and enhancing the natural environment Paras. 170 – 183

BCPNP objective: Objective 5: The Protection of Open Spaces: Plans must restrict the use of land for development which is primarily already outside of the development boundaries and has been designated as AONB. In addition, information that has been gathered by the Group on a number of identifiable green spaces which have yet to be afforded protected status, but would be lost for the purposes of sport, leisure and agricultural uses if policy decisions were to change within the RDC Strategic Aims, must also be given that protection.

RDC policy: Policy EN1

Key Evidence base reference: Local Green Spaces Analysis, Character Appraisal and Action in Rural Sussex 2016 Parish Survey (AiRS).

- 5.3.2 Policy intent:** The policy seeks to conserve the landscape and scenic beauty in the Parish. Although there is protection in the AONB, the NPPF 2019 makes it quite clear that these areas should be conserved. The above policy should be read in conjunction with RDC CS Policies EN1 and EN5.

Policy EN3: Conservation of the environment, ecosystems and biodiversity

Development will be expected to retain well-established features of the environment, ecosystem and biodiversity, including mature trees, species-rich hedgerows, watercourses and other ecological networks together with the habitats alongside them including ponds and green corridors.

Conformity list of references

NPPF 2019: Conserving and enhancing the natural environment Paras. 170 – 183

BCPNP objective: Objective 5: The Protection of Open Spaces: Plans must restrict the use of land for development which is primarily already outside of the development boundaries and has been designated as AONB. In addition, information that has been gathered by the Group on a number of identifiable green spaces which have yet to be afforded protected status, but would be lost for the purposes of sport, leisure and agricultural uses if policy decisions were to change within the RDC Strategic Aims, must also be given that protection.

RDC policy: Policy EN1

Key Evidence base reference: Local Green Spaces Analysis, Character Appraisal and Action in Rural Sussex 2016 Parish Survey (AiRS).

5.3.3 Policy intent: The policy seeks to provide further protection for the special natural environment of the Parish and to encourage developers to think if the impact and mitigation of development on the established ecosystem.

Policy EN4: Countryside Protection

All development will be considered with regard to the need to protect the landscape character of the countryside. Proposals which preserve and enhance the open character of the important gaps between settlements and which are not detrimental to the Green Infrastructure Network (as identified by the Local Planning Authority) will be supported.

Development will only be permitted where it conserves or enhances the natural character of Battle.

In particular it will:

1. take opportunities to restore the natural function of all watercourses to improve water quality, to prevent flooding and enhance wetland habitats;
2. reflect the settlement pattern of the neighbourhood, use local materials that enhance the appearance of the development and support woodland management;
3. relate well to historic route ways such as ancient droeways and not divert them from their original course or damage their rural character by loss of banks, hedgerows, verges or other important features;
4. not result in the loss or degradation of Ancient Woodland or historic features within it and, where appropriate will contribute to its on-going management; **and**
5. conserve and enhance the ecology and productivity of fields, trees and hedgerows, retain and reinstate historic field boundaries, and direct development away from medieval or earlier fields, especially where these form coherent field systems with other medieval features.

Conformity list of references

NPPF 2019: Conserving and enhancing the natural environment Paras. 170 – 183

BCPNP objective: Objective 5: The Protection of Open Spaces: Plans must restrict the use of land for development which is primarily already outside of the development boundaries and has been designated as AONB. In addition, information that has been gathered by the Group on a number of identifiable green spaces which have yet to be afforded protected status, but would be lost for the purposes of sport, leisure and agricultural uses if policy decisions were to change within the RDC Strategic Aims, must also be given that protection.

RDC policy: This is explicit in Ch. 5. Spatial Vision, supported by a number of policies, notably OSS1, OSS3, RA2-4, EN1, DaSA chapter 10.

Key Evidence base reference: Character Appraisal and Battle CP Local Heritage List (Non-dwellings)

5.3.4 Policy intent: The policy seeks to protect the distinct open rural character of the Parish as explored in the Character Appraisal. Retaining the open character is valued by residents and tourists and crucial for maintenance of visual separation in the gaps between settlements.

Policy EN5: Historic Environment

Designated historic heritage assets in the Parish and their settings, including listed buildings, undesignated local heritage assets, historic public realm, sites of archaeological significance, sensitive ecology, landscape designation and scheduled ancient monuments or conservation areas will be preserved and enhanced for their historic significance, including the contribution made by their settings and their importance to local distinctiveness, character and sense of place. The historical heritage of Battle is paramount.

Proposals for development that affect non-designated heritage assets will be considered taking account of the scale of any harm or loss and the significance of the heritage assets.

Applicants should clearly demonstrate that any harm is both unavoidable and justified on the basis of the public benefits it delivers.

Conformity list of references

NPPF 2019: Paras. 184-202

BCPNP objective: Objective 6: Protection of Heritage Assets within the Parish Conurbation: A community is defined by its most important assets and where there are additional historical attributes attached to those assets no major changes should be allowed that would change the character of the town or other areas of the district which enjoy such history. Whilst this will influence development proposals for historic as well as listed building it reflects the communities wishes and is essentially what attracts the many thousands of tourists to the area every year.

RDC policy: Environment chapter, notably policy EN2

Key Evidence base reference: Character Appraisal and historic environment study which is included in the Character appraisal report, Battle CP Local Heritage Listing (Non-buildings) and the Battle CP Heritage Charter.

5.3.5 Policy intent: The policy seeks to promote a positive strategy for the conservation and enjoyment of the historic environment for future generations to come. In doing so, it should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance.

Policy EN6: Locally important historic buildings, other structures and other undesignated heritage assets

Heritage assets shown on **Maps 4 and 5** and listed in **Schedule 2** or otherwise identified by the local planning authority as non-designated heritage assets together with other key buildings, or structures or other heritage assets which are of substantial local architectural and historic significance and contribute to the Parish distinctiveness will be conserved in a manner appropriate to their significance. Development proposals will be expected to retain and enhance the local distinctiveness of such buildings and structures and their setting. The Battle Character Appraisal and historic environment study (see evidence base) will be used as a reference to assess the impact of the proposals. The local heritage listing of buildings from Battle Town Council submitted to the Local Planning Authority will also be used to assess the impact of any proposals affected.

Conformity list of references

NPPF 2019: Paras. 184-202

BCPNP objective: Objective 6: Protection of Heritage Assets within the Parish Conurbation: A community is defined by its most important assets and where there are additional historical attributes attached to those assets no major changes should be allowed that would change the character of the town or other areas of the district which enjoy such history. Whilst this will influence development proposals for historic as well as listed building it reflects the communities wishes and is essentially what attracts the many thousands of tourists to the area every year.

RDC policy: Environment chapter, notably policy EN2

Key Evidence base reference: Character Appraisal (historic environment study), Battle CP Heritage Charter and Historic England – Listed Buildings.

5.3.6 Policy intent: The policy seeks to protect heritage assets even where they are not in a Conservation Area.

Rother District Council has not formally identified any dwellings or other heritage assets which are non-designated. A separate working group has been formed by Battle Town Council that has developed a heritage charter which includes the identification of local heritage assets which are not protected by English Heritage listing.

The Local Planning Authority will receive and consider recommendations for the local heritage listing of buildings and other heritage assets from the Battle Town Council.

5.4 Economy and Tourism

Policy ET1: Tourism and Local Economy

Small scale and appropriate tourism development in the Civil Parish of Battle will be encouraged where:

1. it will help sustain the local economy and help local businesses to remain viable;
2. it is in keeping with the character of the area and the amenities of neighbouring properties and minimises visual impact through sensitive siting and design
3. it minimises the impact of the proposal on the wider character of the AONB landscape **and**
4. it will not cause or exacerbate any severe traffic problems and will promote sustainable transport.

Conformity list of references

NPPF 2019: Supporting a prosperous rural economy Paras 83 and 84

BCPNP objective: Objective 7: Enhance the role of Tourism within the Parish: Diversity improves the experience of tourism, and thereby increases the number of tourists within the Parish, as it caters for a variety of experiences to be satisfied. One of the aims within the Neighbourhood Plan is to encourage the placement of public art exhibits around all areas of the Parish. These are being funded by public subscriptions and developer contributions. This initiative will lead to many permanent exhibits within the Parish.

RDC policy: Policies OSS1 and RA1 support rural service centre roles and provides for sustainable growth

Key Evidence base reference: Heritage Trails

5.4.1 Policy intent: The policy seeks to encourage tourism and local economy.

Policy ET2: Encouraging employment

Business development in the Civil Parish will be encouraged where:

1. it is in keeping with the character of the area and the amenities of neighbouring properties and minimises visual impact through sensitive siting and design
2. the impact of the proposal minimises the wider character of the area **and**
3. it will not cause or exacerbate any severe traffic problems and will promote sustainable transport. Proposals to encourage the retention, improvement or reuse of an existing employment provision for the community will be strongly supported.

Conformity list of references

NPPF 2019: Supporting a prosperous rural economy Paras 83 and 84

BCPNP objective: Objective 7: Enhance the role of Tourism within the Parish: Diversity improves the experience of tourism, and thereby increases the number of tourists within the Parish, as it caters for a variety of experiences to be satisfied. One of the aims within the Neighbourhood Plan is to encourage the placement of public art exhibits around all areas of the Parish. These are being funded by public subscriptions and developer contributions. This initiative will lead to many permanent exhibits within the Parish.

RDC policy: Chapter 16-Economy (policy EC4)

Key Evidence base reference: Action in Rural Sussex 2016 Parish Survey (AiRS) and Heritage Trails

5.4.2 Policy intent: Employment is a key aspect of the vitality of a community and the policy therefore encourages appropriate business development which will support this growth.

Policy ET3: Developer Contributions

Where the need is identified, new development must provide appropriate new facilities and infrastructure on-site. It must fund or directly deliver off-site facilities through CIL contributions or other agreed method, as required by the Plan, the Local Planning Authority and those identified by the County Council. New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community.

Conformity list of references

NPPF 2019: Para 34

BCPNP objective: Objective 8: The enhancement of Village/Town Centres within the Parish: The separate communities which make up the Parish of Battle are being encouraged to provide the facilities – whether social, sporting or otherwise – desired by the residents and visitors alike, by careful allocation of the Community Infrastructure Levy monies which shall be used to pump the required funds needed for those facilities. A prime example of this objective is the wish to set up a Health Centre within Netherfield to alleviate the pressure of the Battle surgeries.

RDC policy: Policies CO1 and IM2

Key Evidence base reference: Action in Rural Sussex 2016 Parish Survey (AiRS), Community Infrastructure Levy Regulations and Preferred Sites List

5.4.3 Policy intent: The policy aims to promote provision of infrastructure to support sustainable growth.

Policy ET 4: Protection of Assets of Community Value

Proposals that will enhance the viability and/or community value of any property that has been included in the register of Assets of Community Value will be supported. Proposals that result in the loss of such a property or in significant harm to its community value will be resisted, unless it can clearly be demonstrated the continuing operation of the property is no longer economically viable. This would mean the site has been marketed at a reasonable price for at least a year for that and any other suitable employment or service trade uses and no interest in acquisition has been expressed.

Conformity list of references

NPPF 2019: Para 8, 91 – 93

BCPNP objective: Objective 8: The enhancement of Village/Town Centres within the Parish: The separate communities which make up the Parish of Battle are being encouraged to provide the facilities – whether social, sporting or otherwise – desired by the residents and visitors alike, by careful allocation of the Community Infrastructure Levy monies which shall be used to pump the

required funds needed for those facilities. A prime example of this objective is the wish to set up a Health Centre within Netherfield to alleviate the pressure of the Battle surgeries.

RDC policy: Employment strategy and Land review (ESLR), Ch. 16 Economy and respective spatial development strategies

Key Evidence base reference: Action in Rural Sussex 2016 Parish Survey (AiRS), The Assets of Community Value (England) Regulations 2012

5.4.4 Policy intent: The policy is intended to provide protection to the assets which meet the Local Authority’s criteria.

The Localism Act 2011 has introduced the Community Right to Bid, which gives eligible organisations such as Town and Parish Councils, and defined community groups the opportunity to nominate (an) asset(s) (building or land) they believe to be important to their community well-being, to be listed by the Local Authority as an Asset of Community Value. This aims to ensure that buildings and amenities can be kept in public use and remain an integral part of community life where possible, and thus reduce the trend in recent years of communities losing local amenities and buildings of importance to them.

The Town Council has identified a proposed list of assets and will need to apply to RDC for inclusion of these sites on the local planning authority’s register of Assets of Community Value. This will provide the Parish Council or other community organisations within Battle with an opportunity to bid to acquire the asset on behalf of the local community, if it is placed for sale on the open market, under the Community Right to Buy Regulations.

Proposed list of Assets of Community Value

Battle Memorial Hall (also listed by Historic England) 81 High St, Battle TN33 0AQ
Battle Library
Youth Centre
Land in front of Youth Centre/Teachers Centre Battle High Street – currently used as a skate board ramp (the land is also listed in the Neighbourhood Plan as a Local Green Space BA GS08)
White Hart Pub Netherfield
Netherfield Arms Netherfield
The Post Office and village shop in Netherfield
Village Hall Netherfield
Marley Stores Coronation Gardens Marley Lane
The Emmanuel Centre, Harrier Lane
Battle Baptist Church Hall (Manna House) Mount St, Battle TN33 OEG
Mount Street Car Parks
Market Road Car Parks
The Guide Hut in the Recreation Ground North Trade Road Battle
The Pavilion on the Recreation Ground North Trade Road Battle (current and future)
Battle Club (91 High Street)
The Kings Head, 37 Mount St, Battle TN33 OEG
The Bull Inn, High Street, Battle 27 High St, Battle TN33 OEA
The Abbey Hotel Pub 84 High St, Battle TN33 0AQ
The Chequers Inn, Lower Lake, Battle TN33 0AT
The Railway (ex-Senlac), Station Approach, Battle TN33 ODE
The Black Horse Hastings Rd, Battle TN33 OSH

Policy ET 5: Community leisure and cultural facilities

Proposals to sustain or extend the viable use of existing community leisure and cultural facilities and the development of new facilities will normally be supported if they comply with other policies in this Neighbourhood Plan. In particular, the Plan will encourage and support the provision of dual use facilities for schools and for the community if any such development proposals are likely to be brought forward. Development proposals must consider and where appropriate alleviate the adverse impact of any development on existing community and cultural facilities.

Conformity list of references

NPPF 2019: Para 28 and 92

BCPNP objective: Objective 8: The enhancement of Village/Town Centres within the Parish: The separate communities which make up the Parish of Battle are being encouraged to provide the facilities – whether social, sporting or otherwise – desired by the residents and visitors alike, by careful allocation of the Community Infrastructure Levy monies which shall be used to pump the required funds needed for those facilities. A prime example of this objective is the wish to set up a Health Centre within Netherfield to alleviate the pressure of the Battle surgeries.

RDC policy: Policies CO6 and EC4

Key Evidence base reference: Action in Rural Sussex 2016 Parish Survey (AiRS)

5.4.5 Policy intent: The policy seeks to protect the existing community facilities while encouraging the development of new facilities where needed.

SECTION 6: Implementation, Monitoring & Review

6.1 Implementation, Monitoring & Review

- 6.1.1 Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. They are able to choose where they want new homes, shops and offices to be built, as well as, have their say on what those new buildings should look like.
- 6.1.2 The Neighbourhood Plan, if approved in the referendum, will become part of the Rother Development Plan. Its policies will therefore carry the full weight of the policies in the development plan and, in Battle, they will have precedence over the non-strategic policies of Rother's Local Plan/Core Strategy unless material considerations indicate otherwise. Applications will then be determined by RDC using the policies contained in the final 'made' Plan.
- 6.1.3 The Plan will be monitored by the Parish Council on an annual basis, using the planning data collected by Rother District Council and any other data collected and reported at a Parish level that is relevant to the plan. The Parish Council will be particularly concerned to judge whether its policies are being effectively applied in the planning decision process.
- 6.1.4 The extensive survey work carried out to create this plan identified a number of issues and projects that residents feel are important but which cannot form part of the Neighbourhood Plan as they do not relate to land use. It is intended that these issues will be picked up and dealt with by the Parish Council via a Community Action Plan(s).
- 6.1.5 The Town Council proposes to complete a formal review of the Plan at least once every five years or earlier if necessary to reflect changes in the Local Plan or the NPPF 2019 (National Planning Policy Framework) and other local/national factors relevant to the Plan.

SECTION 7: Community Aspirations

- 7.1.1 The extensive engagement work carried out to create this plan identified a number of issues and projects that residents feel are important which cannot form part of the Neighbourhood Plan as they do not relate to land use. It is intended that these issues will be picked up and could be dealt with for example by the Town Council via a Community Action Plan.
- 7.1.2 The Civil Parish of Battle has challenging historical and geographical restrictions to overcome in order to satisfy the Government's and Rother District Council's (RDC) requirement to increase its housing stock. Its location as the site of the famous battle of 1066 attracts tourists from all over the world but its linear development results in traffic bottlenecks. Residents have stated the need to safeguard its historical buildings which attract tourists and brings prosperity to the town.
- 7.1.3 The linear nature of the town of Battle creates a challenge in gaining a common view of the proposed development from its residents. The village of Netherfield and the hamlet of Telham have their own unique challenges. Netherfield also has a linear settlement with a concentration of dwellings in Darvel Down, as a consequence of its historic links to the gypsum mine. RDC has ruled that Netherfield must be considered separately with its own housing targets. These cannot be absorbed into the target for Battle and Telham. Telham's lacks a demonstrable centre leaving it liable to being swallowed up into the Battle conurbation.
- 7.1.4 The community has given Battle Town Council and the Battle Civil Parish Neighbourhood Plan Steering Group its view on what its priorities in achieving the Government and RDC's housing targets: initially 475 dwellings for Battle and 48 dwellings for Netherfield. These were gathered in four major consultations:
- Let's Plan Our Future Together 2016
 - Have Your Say Public Consultation April 2017
 - Public Consultation May 2019
 - Youth Voice September 2019

Here is a summary of the comments made, listed in preference order:

BATTLE & TELHAM:

- Congestion and improvements to footways:
 - roads too narrow
 - lack of parking, bad parking causing delays and a lack of appropriate enforcement
 - absence of safe footways in some areas
- Protecting wildlife and the AONB
- Community Facilities/Amenities
- Protecting and Town's historic buildings and heritage and ensuring new development is in keeping

NETHERFIELD:

- Congestion
 - roads too narrow
 - busy roads
 - lack of footways
- Parking issues
- Infrastructure e.g. Doctors Surgery

- Drainage, flooding and power cuts which cuts off water
- Lack of good broadband speed connectivity
- Lack of public transport

Based on the community responses, we have formulated the Civil Parish of Battle's Aspirations into a set of objectives.

It is important to remember that no neighbourhood plan is able to deliver aspirational projects, however, by compiling a list it shows the intent of Battle Town Council to inform and influence future developments.

These could potentially be addressed by Battle Town Council through the use of the Community Infrastructure Levy (CIL). The following aspirations have been used to show the perceived shortcomings in the local infrastructure and are listed under the relevant objectives.

BATTLE AND TELHAM

1. **OBJECTIVE 1: Reduce congestion, especially at peak times and improvements to footways**
 - 1.1 To reduce the amount of school traffic, particularly from journeys outside the Parish, the children of local residents should be given priority in local schools.
 - 1.2 A site for Park & Ride should be considered on the periphery of the town of Battle for tourist and visitors to reduce pressure on the limited car parking facilities in Battle.
 - 1.3 Coaches should be prohibited from allowing passengers to alight outside on Abbey Green and instead they should be directed to the coach parking facilities in the Market Street Car Park.
 - 1.4 Improved safe walking and cycling will be encouraged by the Battle Schools Greenway which has been proposed as an off-road route from Claverham College to Battle Abbey at Park Lane. Battle has been the subject of an ESCC/Sustrans survey looking at extending safe walking and cycling further to the east of the High Street to include the railway station and beyond. Meanwhile footway extensions on main access roads will be requested under planning applications as required.
 - 1.5 The footways, should be improved and in some cases extended to encourage walking along the major routes on both sides of major roads, e.g. sections along Hastings Road, North Trade Road, Marley Lane and Caldbec Hill.
 - 1.6 Connected and linked routeways must be included in new developments to encourage walking and cycling, especially a connected cycleway/footway from the major development already being proposed by RDC at Blackfriars to the Station.
 - 1.7 The introduction of Civil Parking Enforcement to prevent anti-social parking and "drop offs" which causes congestion.
 - 1.8 The lowering of traffic speeds with the introduction of 20mph zones within the Parish.
 - 1.9 The introduction of additional pedestrian crossings at strategic locations e.g. Battle Hill to Tesco Express.
2. **OBJECTIVE 2: To protect and encourage wildlife, flora and fauna and protect the AONB**

- 2.1 There are already some wildlife protection zones placed on verges to provide a green corridor for birds, animals and insects. These need to be extended and included in all the new developments being proposed.
- 2.2 To limit light pollution at new developments by the use of low-level lighting and/or timed lighting.
- 2.3 To protect the green spaces that exist within the Parish of Battle.
3. **OBJECTIVE 3 Community Facilities**
 - 3.1 A large proportion of the community is concerned with oversubscribed doctors surgeries and dental waiting lists especially for NHS patients. Battle Town Council would support measures to improve local health services.
4. **OBJECTIVE 4 Community Amenities**
 - 4.1 It is evident from the various questionnaires and public opinion that the residents would like additional Community Amenities. These include:
 - a community centre that can centre on youth activities and also potentially Senior Citizens groups
 - a swimming pool to encourage fitness and fun
 - the skate park to be redeveloped
 - improved sporting facilities
 - 4.2 The community has commented on the importance of the Recreational Ground and would like further improvements to be made here and in other green communal areas.
5. **OBJECTIVE 5 Protecting the Town's History and Buildings**
 - 5.1 The community has stated that new builds should be in keeping with the character of the Parish.
 - 5.2 The majority of respondents preferred developments of less than 20 dwellings per new site.
 - 5.3 The majority of respondents would prefer these developments close to the centre of the Parish to reduce congestion and encourage walking and cycling.

NETHERFIELD

Discussion Points and Suggestions:

1. **OBJECTIVE 1: Congestion and improvements to footways**
 - 1.1 To reduce the amount of school traffic around Darvel Down, particularly from journeys from outside the village, the children of local residents should be given priority in the school.

- 1.2 The footways in the village, should be improved and in some cases extended to encourage walking. This includes from the village store to the village hall.

2. OBJECTIVE 2: **Parking**

- 2.1 Enforcement of parking measures within the village.

3. OBJECTIVE 3: **Community Facilities**

- 3.1 The introduction of a bi-weekly “drop in” surgery / health centre within the village.

4. OBJECTIVE 4: **Infrastructure and Utilities**

- 4.1 All new developments in Netherfield should be built in such a way that would potentially improve the drainage within the village.
- 4.2 Further infrastructure improvements are also required to reduce the volume of power outages within the village, which also interrupts the local water supply.
- 4.3 There should also be improvement to the speed and connection of broadband.

5. OBJECTIVE 5: **Lack of Public Transport**

- 5.1 Improvements should be made to the frequency of local bus services to reduce traffic and also enable local residents without transport to travel to larger towns to access.

APPENDIX

Appendix A: Glossary

Community plan	Community plans are produced through collaboration between local residents and representatives of public, voluntary and private sector organisations and businesses. Community plans seek to influence and inform public bodies, organisations and other service providers about the priorities for people in the plan area.
Community right to build	The community right-to-build process is instigated by a 'community organisation' where the community decides to bring forward specific development proposals for the benefit of the community. This might include community facilities and affordable housing.
Core strategy	A plan setting out the spatial vision and strategic objectives of the planning framework for an area.
Habitats Regulation Assessment	This is a requirement for plans that are likely to lead to significant effects on European sites of nature conservation importance.
Local Planning Authority	A local planning authority is the local authority or council that is empowered by law to exercise statutory town planning functions for a particular area of the United Kingdom
Localism Act	The Localism Act 2011 includes five key measures that underpin the government's approach to decentralisation. <ul style="list-style-type: none"> •Community rights •Neighbourhood planning •Housing •General power of competence •Empowering cities and other local areas
National Planning Policy Framework (NPPF 2019)	The NPPF 2019 sets out the planning policies for England. This was a key part of the reforms to make the planning system less complex and more accessible, and to promote sustainable growth. The Framework sets out planning policies for England and how they are expected to be applied. It provides guidance for local planning authorities and decision-takers, both in drawing up plans and making decisions about planning applications
National Planning Policy Statements and guidance notes	Planning policy guidance notes, and their replacements planning policy statements, are prepared by the government after public consultation to explain statutory provisions and provide guidance to local authorities and others on planning policy and the operation of the planning system. The majority of planning policy statements and guidance notes have been superseded by the NPPF 2019.
Neighbourhood area	A neighbourhood area has to be formally designated for a neighbourhood plan or order to be produced

Neighbourhood Development Order	A neighbourhood development order can directly grant planning permission for certain specified kinds of developments within a neighbourhood area.
Neighbourhood Development Plans	New type of plans introduced by the Localism Act 2011. They will be prepared by town/Parish councils, or constituted Neighbourhood Forums, and develop detailed planning policies for a town/Parish (or part of them) in general conformity with the council's Local Plan or LDF.
Planning Advisory Service	The Planning Advisory Service helps councils provide faster, fairer, more efficient and better quality planning services. See www.pas.gov.uk
Qualifying Body	This can be described as: a Parish council, organisation or body designated as a neighbourhood forum, authorised to act in relation to a neighbourhood area for the purposes of a neighbourhood development plan
Statement of Community Involvement	A document setting out how the authority will consult and involve the public at every stage in the production of the Local Development Framework.
Statutory Consultees	Statutory consultees for the purposes of neighbourhood planning are defined within the Neighbourhood Planning (General) Regulations
Steering Group	A steering group is a committee of individuals made up of community representatives who will drive forward the neighbourhood planning project on behalf of the town or Parish council.
Strategic Environmental Assessment	Strategic environmental assessment (SEA) is a systematic decision support process, aiming to ensure that environmental and possibly other sustainability aspects are considered effectively in policy, plan and programme making.
Town and Country Planning Act 1990	The Town and Country Planning Act 1990 is an act of the British Parliament regulating the development of land in England and Wales.

Appendix B: List of Neighbourhood Plan Policies

Housing and Development

Policy HD1: Development Boundary

Policy HD2: Site Allocations

Policy HD3: Housing mix

Policy HD4: Quality of Design

Policy HD5: Integration and protection of landscaping

Policy HD6: Local Connection

Policy HD7: Integration of New Housing

Policy HD8: Protection of the Green Gaps between Settlements

Infrastructure

Policy IN1: Traffic mitigation

Policy IN2: Maintain and improve existing infrastructure

Policy IN3: Parking and new development

Environment

Policy EN 1: Local Green Space Designations

Policy EN2: Natural environment

Policy EN3: Conservation of the environment, ecosystems and biodiversity

Policy EN4: Countryside Protection

Policy EN5: Historic Environment

Policy EN6 Locally important historic buildings, other structures and other undesignated heritage assets

Economy and Tourism

Policy ET1: Tourism and Local Economy

Policy ET2: Encouraging employment

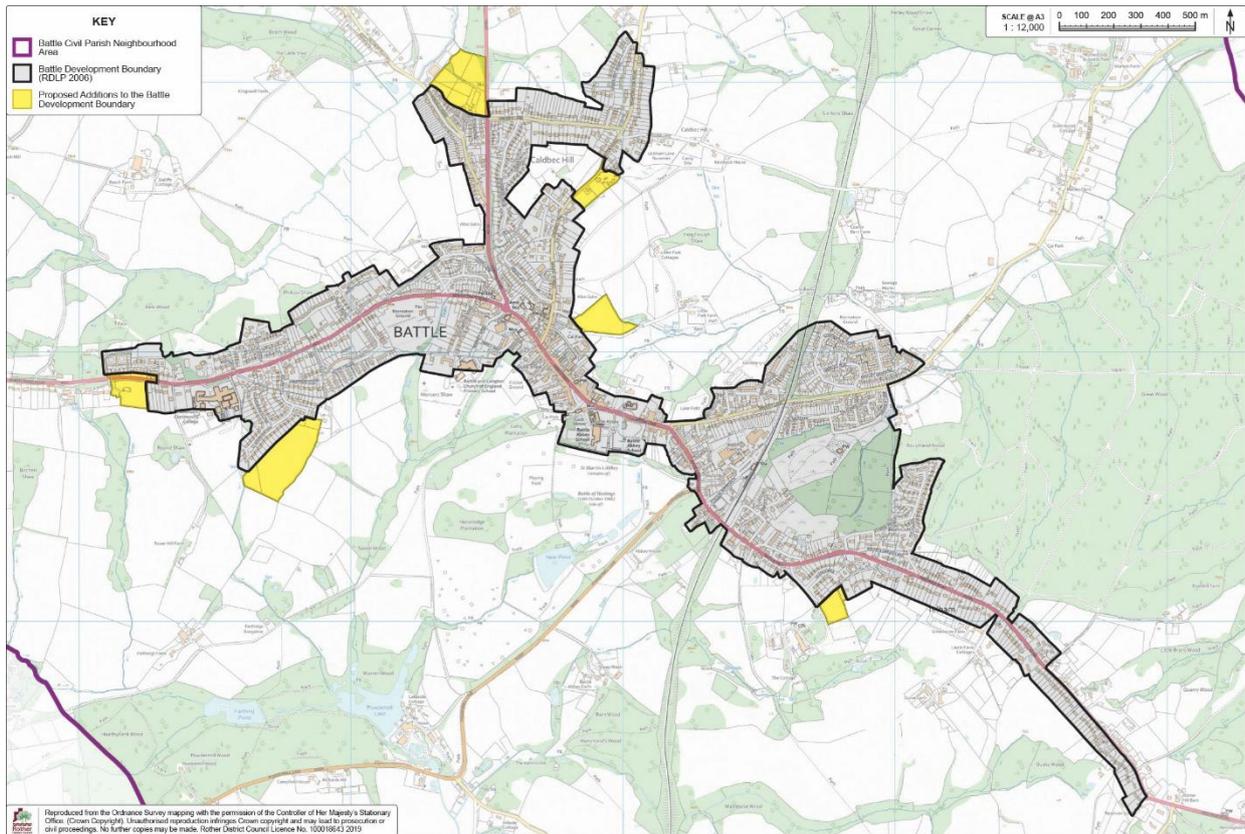
Policy ET3: Developer Contributions

Policy ET4: Protection of assets of community value

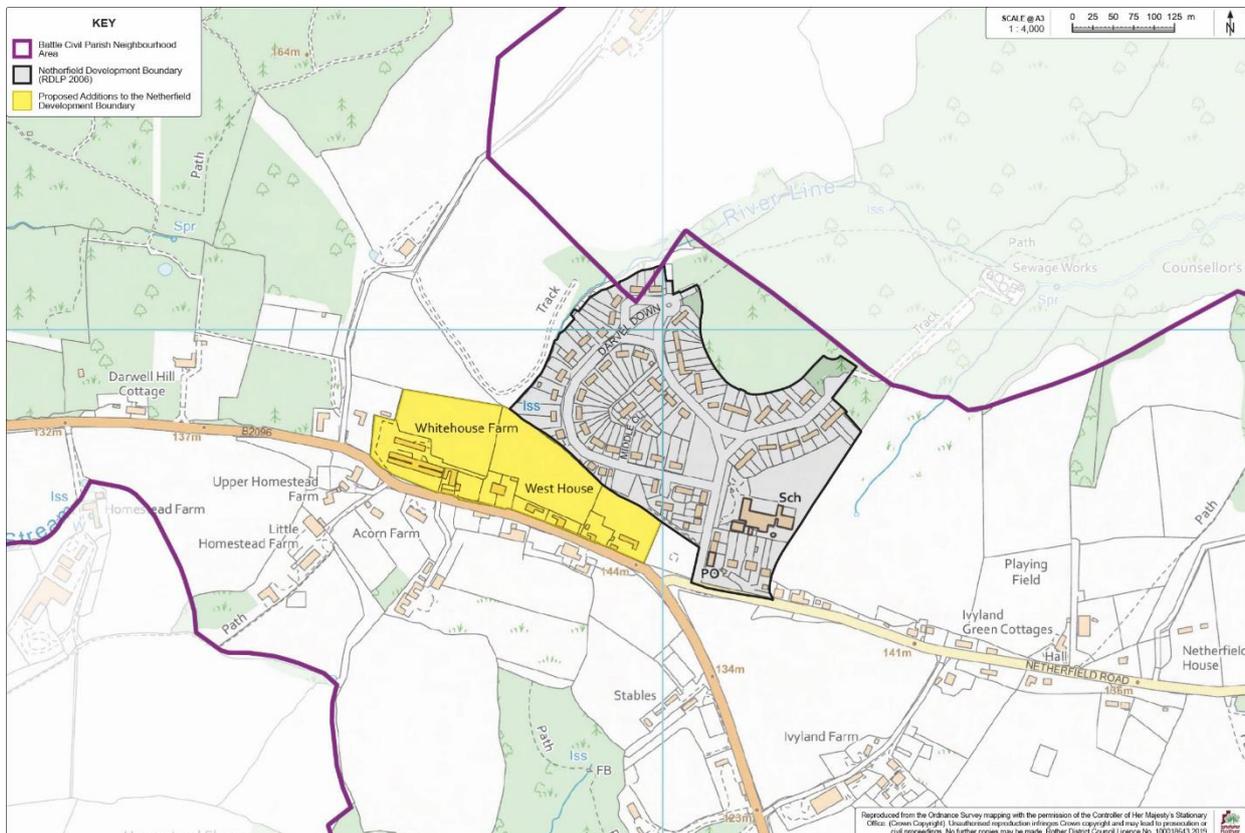
Policy ET5: Community leisure and cultural facilities

Appendix C: Maps

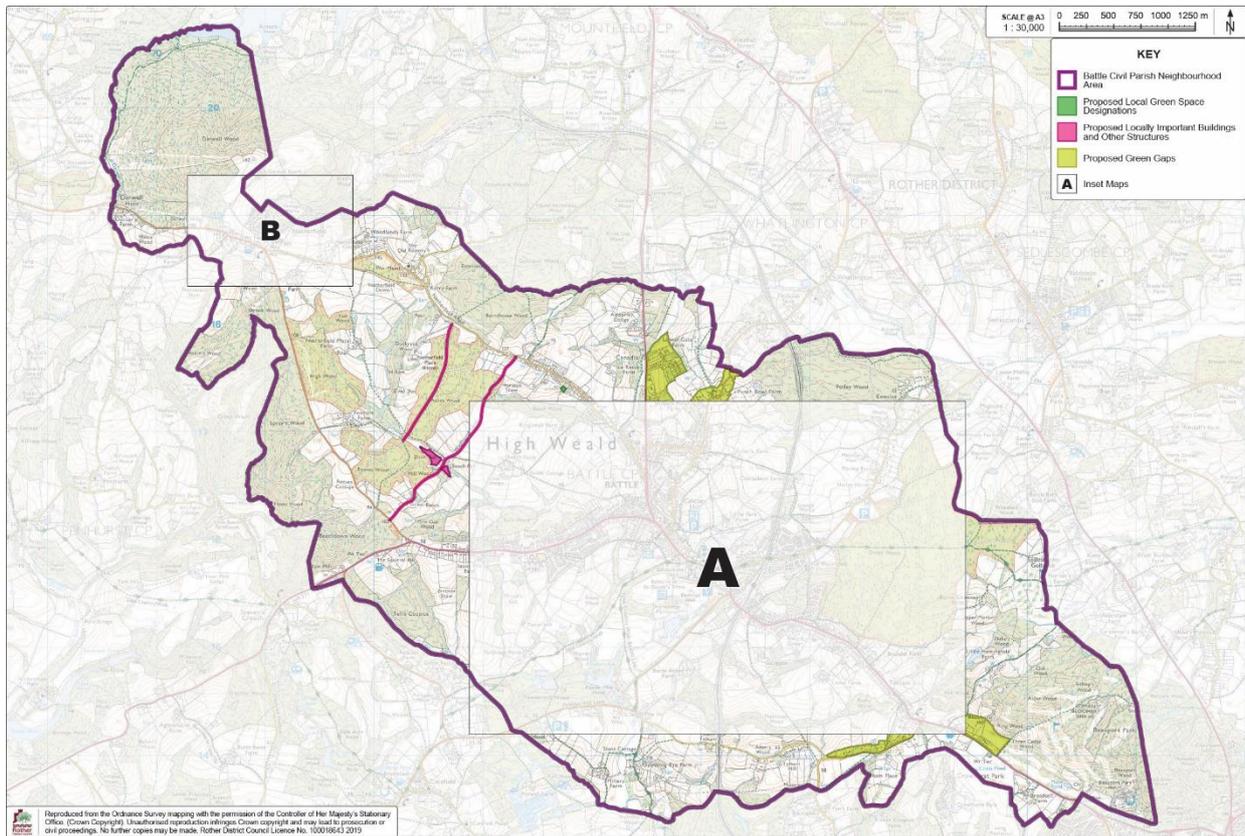
➤ Map 1: Development Boundary - Battle



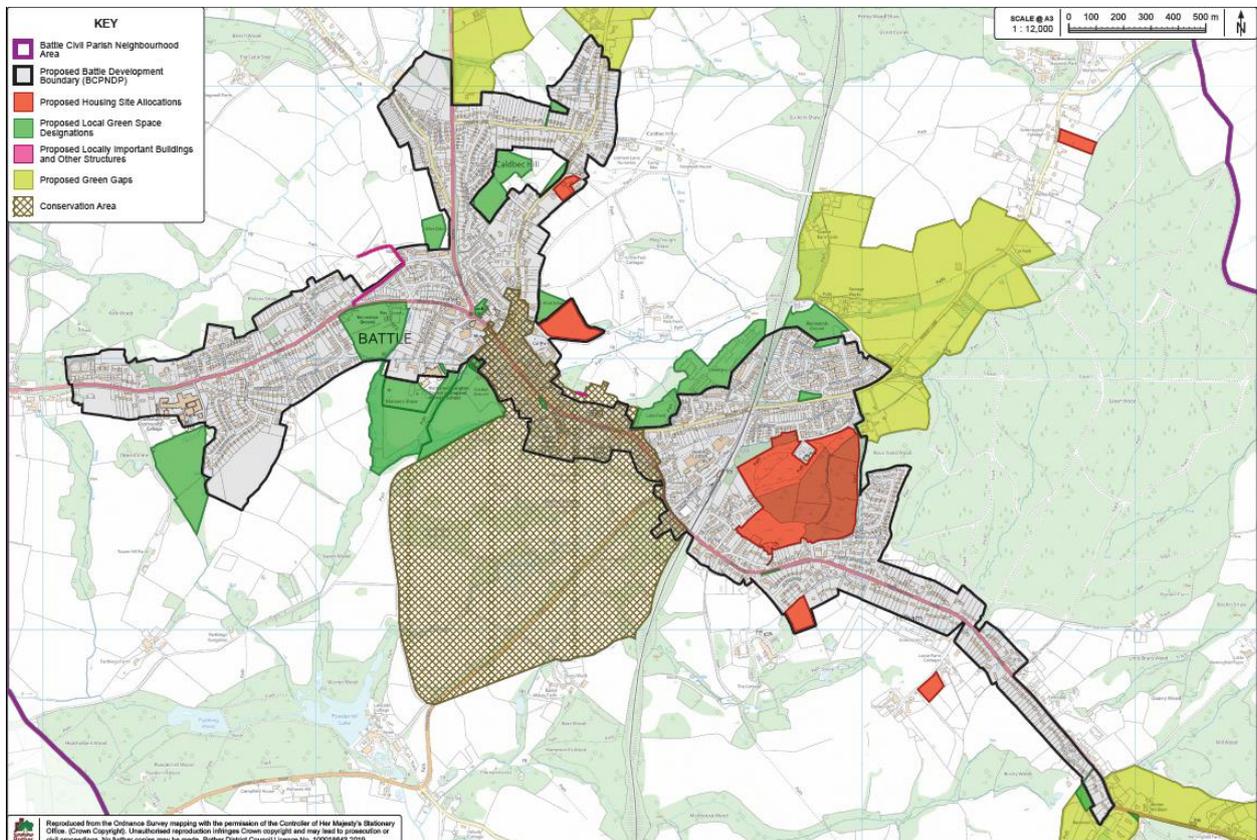
➤ Map 2: Development Boundary - Netherfield

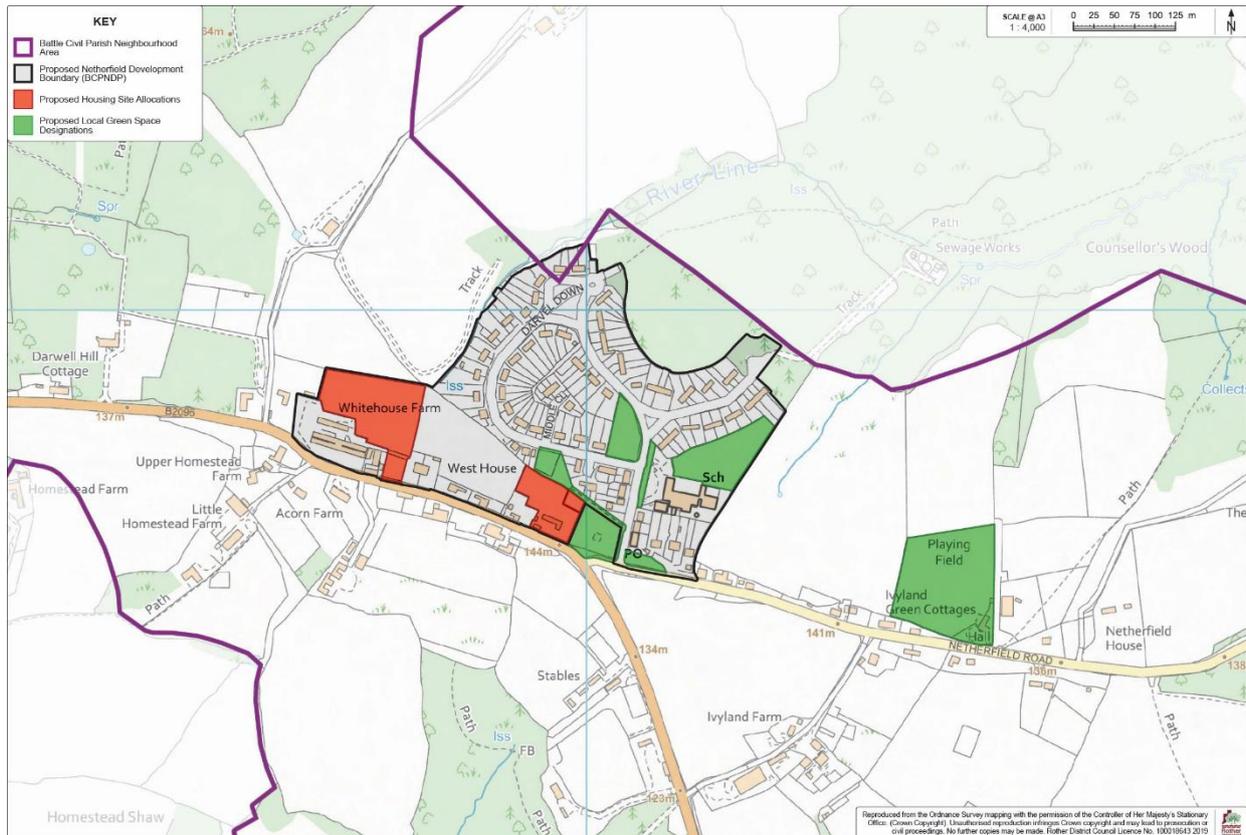


➤ Map 3: Proposals Map – Inset maps



➤ Map 4: Policies Map – Battle Inset





Appendix D: Green Gap Analysis

The Battle Civil Parish Neighbourhood Plan Steering Group (BCPNP 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:

- To maintain the separate identity and distinctiveness between settlements
- To maintain the strategic settlement pattern
- To prevent the coalescence of settlements”

The BCPNPSG have carefully considered which areas should be designated as Green Gaps in order to achieve the objectives described above and have taken account of the DASA proposals (old and new).

The following are designated as Green Gaps:

- GG01 Battle north, east of A2100
- GG02 Battle north-east, Whatlington Road
- GG03 Battle east, Marley Lane
- GG04 Telham, A2100 and Telham Lane

Appendix E: List of Evidence Base documents

The Plan is supported by various evidence documents which has been used to inform the policies within the Plan. Including the following would make the Plan too unwieldy so it should be noted that the Plan should be read in conjunction with these documents where further detail/evidence is required.

The key evidence base documents are listed below and can be found on the BCPNP website:

- Draft Neighbourhood Plan (Regulation 14)
- Statutory Environmental Assessment
- Preferred Site List
- Preferred Site Maps
- Preferred Site - Extracts from RDC SHLAA June 2013
- Local Green Spaces Analysis
- Green Gap / Strategic Gap Analysis
- AECOM Site Assessments
- AECOM Design Guidelines
- Proposed Assets of Community Value
- Action in Rural Sussex 2016 Parish Survey (AiRS)
- Feedback from 2017 consultation "Have your say"
- Feedback from 2019 consultation
- Feedback from Young Person Survey 2019
- Battle CP Local Heritage Listing (non-dwellings)
- Historic England - Listed Buildings
- Heritage Trails
- Character Appraisal
- Parish Analysis Study
- Green Infrastructure Study
- Battle CP Heritage Charter
- High Weald AONB Design Guide
- Development and Site Allocations (DaSA) Strategic Gap Background Paper (Rother District Council) March 2016
- Updated Strategic Gap Paper (Rother District Council) July 2019
- Communication Strategy
- Community Infrastructure Levy Regulations (UK)
- Community Infrastructure Levy Regulations (Rother)
- The Assets of Community Value (England) Regulations 2012
- Battle Observer regular monthly articles

Archive Documents

- SWOT Analysis 2015-11-11
- Battle Consultation Feedback Form May 2019.pdf
- battle-neighbourhood-plan-call-for-site-March2018.pdf
- battle-np-new-website-flyer.pdf
- battle-np-offered-site-listing-aug2017.pdf
- battle-np-plan-evidence-survey-accompanying-letter.pdf (on USB)
- battle-np-plan-evidence-survey.pdf (on USB)
- battle-np-potential-acvs-20170313.pdf
- battle-np-publicconsult1-display-built-environment-assets-of-community-value.pdf
- battle-np-public-consult-suggestions- form.pdf
- battle-np-SHLAA-sites-list-v3-20170614.pdf
- battle-np-sites-offered.pdf

- [battle-np-offered-sites-map-20170818.pdf](#)
- [Feedback_form.pdf](#)
- [Offered sites list_v4_20180904.pdf](#)
- [rdc-shlaa-sites-map-20170608.pdf](#)
- [BCPNP_consultation_documents_used_on_4th_May_2019_V2.0_20190506.ppt](#)

Appendix F: SEA Screening Determination

Your ref:
Our ref: 6.3a BNP
Please ask Frank Rallings
for:
Direct dial no: 01424 787634
Date: 11 March 2019

Donna Moles Consultancy
moles.consultancy@gmail.com
by email

Dr Anthony Leonard
Executive Director

Town Hall
Bexhill-on-Sea
East Sussex TN39 3JX

Dear Donna

SEA Screening for the Battle Neighbourhood Plan

Further to your request for an SEA screening opinion I have now received the comments of the Statutory Environmental Bodies (SEB's) which are as stated below :

Natural England

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Strategic Environmental Assessment (SEA) screening opinion

Where Neighbourhood Plans could have significant environmental effects, they may require a Strategic Environmental Assessment (SEA) under the Environment Assessment of Plans and Programmes Regulations 2004 (as amended). Further guidance on deciding whether the proposals are likely to have significant environmental effects and the requirements for consulting Natural England on SEA are set out in the National Planning Practice Guidance at:

<http://planningguidance.communities.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-neighbourhood-plans>

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

☐

Historic England

Thank you for consulting Historic England on the requested screening opinion for SEA of the Battle Neighbourhood Plan. We are pleased to see positive elements of plan making already emerging, including the character assessment document among the supporting information that you have supplied.



We note that the steering group have already undertaken some review of potential housing sites and have established a short list. Given the plan area's importance for its historic environment and the density of heritage assets (including larger designated assets such as the Conservation Area and Registered Battlefield, which are likely to have extensive settings, we suggest that allocating sites for development that have not otherwise been assessed for a higher level or equivalent plan document, such as the Local Plan, has potential for likely significant environmental effects, depending on the locations of those sites and their relationship with heritage assets (including non-designated assets and previously unidentified assets). As such, unless it is demonstrable that none of the sites assessed as potential allocation sites would have impacts that merit assessment (including where their allocation might be suitable subject to mitigation), we feel that SEA of the plan should be required.

To determine the likely effects of the plan and any mitigation measures that may be required, it may be necessary for any assessment of potential allocation options to include consideration of sites that have already been rejected where there is any reasonable potential of their being considered for allocation.

We would be pleased to advise on any potential sustainability objectives that should be considered, but given Battle's particular historic significance we would suggest that whilst it may be suitable to include one or more general objectives to consider the plan area's designated and non-designated heritage assets according to their significance, it would also be appropriate to include separate objectives to focus attention on the need to conserve and enhance the heritage significance of the registered battlefield and listed and scheduled abbey complex. It would also be helpful to consider whether an objective should be identified to manage potential conflict between the promotion and enjoyment of the town's heritage as an asset attracting visitors and its continuing conservation and the character and amenity of the town as a whole - sorry this is a bit of a mouthful - It might be helpful to discuss with you and the steering group whether there are any perceived conflicts in the town in this area.

Please don't hesitate to contact me if you have any queries

Yours sincerely

Rob Lloyd-Sweet

Rob Lloyd-Sweet | Historic Places Adviser | South East England | Historic England
Mobile: 07825 907288

Eastgate Court | 195 – 205 High Street | Guildford | Surrey | GU1 3EH

Environment Agency

We have no comments to make at this stage from a planning point of view but are happy to respond at the scoping stage under our discretionary planning advice service.



Neighbourhood Planning –National Planning Practice Guidance

Guidance on the assessment of Neighbourhood Plans in light of the SEA Directive is contained within the National Planning Practice Guidance. The guidance highlights three triggers that may require the production of an SEA, for instance where:

- a neighbourhood plan allocates sites for development
- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

In the opinion of the Local Planning Authority, an SEA should be undertaken for the Battle Neighbourhood Plan (BNP). I have set out the reasoning below in relation to the criteria for determining the likely significance of effects, as contained in Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.

1. The BNP will allocate sites and form part of the 'development plan' and thereby exert a direct and substantial influence over development proposals coming forward in the period.
- 2 As regards the characteristics of the area covered by the BNP (as set out in Schedule 1(2) of the regulations), I note particularly that:
 - a) the area is wholly within the High Weald AONB, which enjoys the highest status of protection in relation to landscape and scenic beauty;
 - b) Battle is an historic town containing the Abbey and the 1066 Battlefield, a Conservation Area, and many listed buildings along with Ancient Monuments, Parks & Gardens of Special Historic Interest, Archaeological Notification Areas and Archaeologically Sensitive Areas located within the town and its environs;
 - c) Within the rural part of Battle parish there are different components of the AONB including Ancient Woodlands, SSSI's, Local Wildlife Sites (SNCI's) and certain BAP habitats, along with areas liable to flooding.

Also, to clarify the process in relation to the 'scoping' stage, RDC has already produced a 'Sustainability Appraisal Scoping Report' that is considered applicable to the SEA process of Neighbourhood Plans produced within the District. It can be found on our web-site here: <http://www.rother.gov.uk/index.cfm?articleid=5006>

Particular reference should be made to the 'Sustainability Appraisal Framework' (Task A4) which contains decision-aiding questions to help inform the SEA process. As the Scoping Report states, this framework *'is also considered relevant and applicable to Neighbourhood Plans produced within the District'*. The scope of information to be included in the environmental report should address the SEA objectives set out below. The level of detail should reflect the geographical extent of the NP as far as practicable, drawing on the Council's own Scoping Report referred to above and baseline information already provided and any available from other sources to meet regulatory requirements.



In relation to the SEA process for the Battle Neighbourhood Plan, it is considered that the following objectives from the Sustainability Appraisal Framework should be screened in for SEA purposes:

- 7: Improve accessibility to services and facilities for all ages across the District
- 9: Improve efficiency in land use and encourage the prudent use of natural resources
- 10: Reduce road congestion and pollution levels and ensure air quality continues to improve by increasing travel choice and reducing car usage
- 11: Reduce emissions of greenhouse gases
- 12: Minimise the risk of flooding and resulting detriment to people and property
- 13: Maintain, improve and manage water resources in a sustainable way
- 14: Conserve and enhance bio-diversity and geo-diversity
- 15: Protect and enhance the high quality natural and built environment

In addition, whilst these objectives are likely to be most relevant to this particular Neighbourhood Plan in terms of potential significant environmental effects, you may wish to also consider the other SA/SEA objectives in the Framework for the purposes of assessing the overall sustainability of proposed policies.

If there are any queries we would be happy to advise further and please accept our apologies in the delay in getting this response to you.

Yours sincerely,



Frank Rallings DipTP(Nottm) FRTPI
Neighbourhood Planning Liaison Consultant
Strategy & Planning Service
Rother District Council



SCHEDULES

Schedule 1: Local Green Space Designations Analysis

A specific NP set of numbers has been invoked for Green Spaces, numbered thus:

NE GS 01, NE GS 02... = Netherfield Green Space number series – not priority ordered

BA GS 01, BA GS 02... = Battle Green Space number series – not priority ordered

NETHERFIELD SITES

Ref. No.	Green Space / Location	Justification / Owner
NE GS01	Children’s Play equipment area, Darvel Down [NE 11]	This area has a fenced child safety area with play equipment and open green space - much used and revered by younger families. Owner: RDC
NE GS02	Village Green, Darvel Down / B2096 opposite shop [NE 07]	This area provides an open area for informal sports activity fenced off from the road to avoid players being endangered. Provides footway between shop and GS01 and houses to west of village. Owner: RDC
NE GS03	Green space, Netherfield Road	This area provides a village seat with specimen tree planting – adding significantly to the wider hill-top village feel - frequently used and provides a safe viewing point looking south towards coast. Owner: ESCC
NE GS04	Recreation Ground, off Netherfield Road	This area is used by villagers for recreational sports activities and includes the Village Hall/Pavilion. Owner: RDC
NE GS05	Green space in front of school, Darvel Down south-east	This area provides a narrow buffer strip in front of the school, immediately adjacent to the roadway offering some safety to children and families. Owner: ESCC
NE GS06	Estate green space opposite school, Darvel Down east, middle	This area provides a remarkable and large open area (“green lung”) within the very densely arrayed houses – it is a significant feature of the Darvel Down village street scene centre. Owner: Optivo requested - NO RESPONSE
NE GS07	School playing field, east of Darvel Down	Fenced, grass play area providing a safe yet vital school facility. Owner: ESCC/LEA

BATTLE AND TELHAM SITES

Ref. No.	Green Space	Justification / Owner
BA GS01	Netherfield Hill Allotments (8 plots), off Beech Close	BTC leased and operated – utilisation: 100% Owner: Optivo
BA GS02	Watch Oak Allotments (26 plots), Chain Lane	BTC leased and operated – utilisation: 50% Owner: RDC
BA GS03	Virgins Croft Allotments (14 plots), off Virgins Lane	BTC operated – utilisation: 90% Owner: BTC
BA GS04	Kingsmead Open Space – two interconnected fields, between Virgins Lane and Caldbec Hill	Important public space, with spectacular views to the north – site of an OS triangulation point underlying the high visibility in the landscape of this area. As a result of local initiatives some of the area has been sown with wildflowers; a small emerging population of wild orchids indicating improving biodiversity due to appropriate management over recent years. Supposed site of King Harold’s 1066 army overnight stop before 1066 battle. Site of several significant trees, including the 950 th anniversary planted commemorative pear tree. Very significant daily footfall of residents, using PRoW footpaths. Owned and maintained: RDC
BA GS05	Green Space (roadside and including north-western footway and hedge/trees), Caldbec Hill, Whatlington Road (summit)	This area is the site of special wildflower cultivation and is a defining street scene summit location - requires a demarcated residents car park area adjacent to road and protection from other vehicle invasion for parking. (ESCC and BTC working to provide vehicle protection.) Owner: ESCC/Highways
BA GS06	Claverham College, playing fields, off North Trade Road	Fenced, grass play area providing a safe yet vital school facility. Owner: ESCC/LEA

...continued

Ref. No.	Green Space	Justification / Owner
BA GS07	Recreation Ground (includes Children's Play equipment areas), North Trade Road	BTC operated central recreation area with ground staff workshop, play areas, tennis courts, limited car parking, football pitches and Pavilion. Long term development plans and projects projected for further additional facilities. Owner: BTC
BA GS08	Teaching & Education Centre (includes grass area with seat overlooking roadway & skateboard ramp), off A2100 – east of "TenSixtySix roundabout"	Open public access play area providing a safe off road skateboard ramp area, adjacent to education building. Owner: ESCC/LEA
BA GS09	Battle & Langton CE Primary School, additional field, south of school compound	Unfenced, grass area providing an additional wild meadow adjacent to school – accessible only from adjacent areas BA GS10. Owner: ESCC/LEA
BA GS10	Mansers Shaw and Amenity Field & adjacent to 1066 Country Walk	Mansers Shaw provides a woodland/ghyll-side permissive walk with hard surfaces and play zones. Very high daily footfall mainly residents. Connected to Amenity Field providing open grassland circular walk Market Road and to 1066 Country Walk/Park Lane. Mansers Shaw Owner: BTC and Amenity Field Owner: ESCC, leased to BTC
BA GS11	Guild Shaw, off Western Avenue	An unusual very peaceful haven comprising copse trees and grass with extensive spring bulb flowers – much enjoyed by residents and tourists. Owner: BTC
BA GS12	George Meadow and Upper Stumblets including cricket ground (includes field further south-west – not mapped), off Park Lane, west of the High Street	Fenced area used by an active Cricket Club, including nets out-of-season. This land is subject to long term agricultural lease for cattle grazing and includes the high footfall 1066 Country Walk connections to Bexhill and west to Pevensey. From Footpath Battle 84 there are views south-west across the cricket ground towards the South Downs Beachy Head ridge. Owner: BTC

...continued

Ref. No.	Green Space	Justification / Owner
BA GS13	The Abbey "Green" (English Heritage), High Street	Hard surface area at the heart of Battle town, in front of Battle Abbey Gatehouse- site of the "Bull-ring" and annual bonfire. Provides for a significant number of off street events (e.g. markets, maypole dancing, etc.) annually and seating for residents and tourists. Managed by BTC Owner: English Heritage
BA GS15	Cherry Gardens Allotments (40 plots), off Mount Street – via FP31a/track to Little Park Farm	BTC operated – utilisation: 100% Owner: BTC
BA GS16	Lake Meadow (National Trust), adjacent to Marley Lane	Important managed grassland with excellent views northwards, includes PRow with heavy footfall onto countryside path network. Owner: National Trust
BA GS17	Recreation Ground (includes Children's Play equipment area), Coronation Gardens	Large flat grass area for sports activities and low fenced children's play area with recently renewed equipment, lobbied for by local residents who much need this facility without having to cross High Street. Will be important for children living in new housing at Blackfriars. Owner: RDC
BA GS18	Recreation Ground (includes Children's Play equipment area), off Hastings Road, Telham	Small grass area for sports activities and children's play area with equipment, local residents use. This site commands excellent uninterrupted views north-west towards the listed 1066 battlefield and west towards Catsfield, with distant views of the South Downs Beachy Head ridge. Owner: BTC
BA GS19	Green Space, Telham, west side of A2100, Hastings Road/Telham Lane junction	Site important to nearby residents, providing rural post box, BTC noticeboard with single car layby. It has a shrubbery planted raised bed that provides a 'visual marker' on the roadside, when travelling from east, of the start of the CP dwellings. Owner: Adopted highway / Gas utility u/g access
BA GS 20	Green space with Heritage Trail marker/seat, beside Marley Lane	This site forms a safe off-road resting place for Heritage Trail walkers to rest and plan their next walking segments through the Coronation Gardens estate. Owner: RDC and adopted highway

...continued

Ref. No.	Green Space	Justification / Owner
BA GS 23	Cemetery, off Marley Lane	Cemetery actively used and recent developed by BTC includes important specimen trees and areas of exceptional wildflowers, including several species of orchids and nationally rare plants. Owner: BTC
BA GS 25	“TenSixtySix roundabout” with Battle Memorial sculpture, junction of A2100, London Road and North Trade Road	Significant modern sculpture commemorating the 1066 Battle of Hastings with small wild grass/flowers under-mat. Managed by BTC Owner: ESCC/Highways
BA GS 28	Green Space, Hastings Road, trees & daffodils planting, South side - east of Glengorse junction	Wide grass verge mixing wildflowers with planted spring bulbs providing an important cherished green area, much cared for by local residents. Includes many mid-maturity trees along its length softening the visual impact of housing fences. Includes the Battle Town “Gate” sign and road sign: “Battle Hill”. Owner: ESCC/Highways

Schedule 2: Locally important historic buildings, other structures and other undesignated heritage assets

The local heritage list – non dwellings are as follows:

1. Chain Lane and Kelklands
2. Beech Mill Hammer Ponds
3. Drovers track through Ashes Woods with links to Ashburnham
4. Wadhurst Lane
5. Tank traps situated at St.Marys Church and continue along the footpath behind the High Street

The Undesignated Heritage Assets which are buildings being compiled by BTC, will be submitted at a later date. Further routeways with historical significance will be added to the submission to be made to RDC at a later date.

