
1. Introduction

- 1.1. The Battle Civil Parish Neighbourhood Plan Steering Group, 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 RDC Development and Site Allocations, (DaSA), Local Plan Strategic Gaps paper dated March 2016 states in clause 1.2:

“The particular objectives of a Strategic Gap are:

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

See: www.rother.gov.uk/dasa Supporting Documents

NOTE: GG is used extensively throughout this document to mean: Green Gap.

- 1.2. The preliminary Neighbourhood Plan public consultation held in April 2017 had displays which informed the residents of the intentions of RDC to amend the strategic gap between Hastings and Battle. They were informed that RDC are proposing the removal of the Strategic Gap south west of Battle in the area bounded by the railway line, the Hastings Road, Telham Lane and Forewood Lane.
- 1.3. The removal of the Strategic Gap has been confirmed in the RDC document Development and Site Allocations Local Plan Proposed Submission incorporating Main and Additional Modifications and changes to the Policies Map July 2019.

This document states:

“Battle and Hastings/St Leonards

6.20 The Gap between Battle and Hastings/St Leonards provide an important function in maintaining the separate identities of Battle and the built up area of Hastings/St Leonards. The break in the ribbon development between the edge of Telham and the Hastings Borough boundary at Breadsell Farm is highly sensitive to change particularly in more open areas and the higher ground and ridges.” (p79)

See Figure 6: Strategic Gap at Bexhill, Crowhurst and Battle (p81)

- 1.4. This analysis, in respect of GG03 has been amended with additional explanatory text following a response from Southern Water during the Reg14 consultation.

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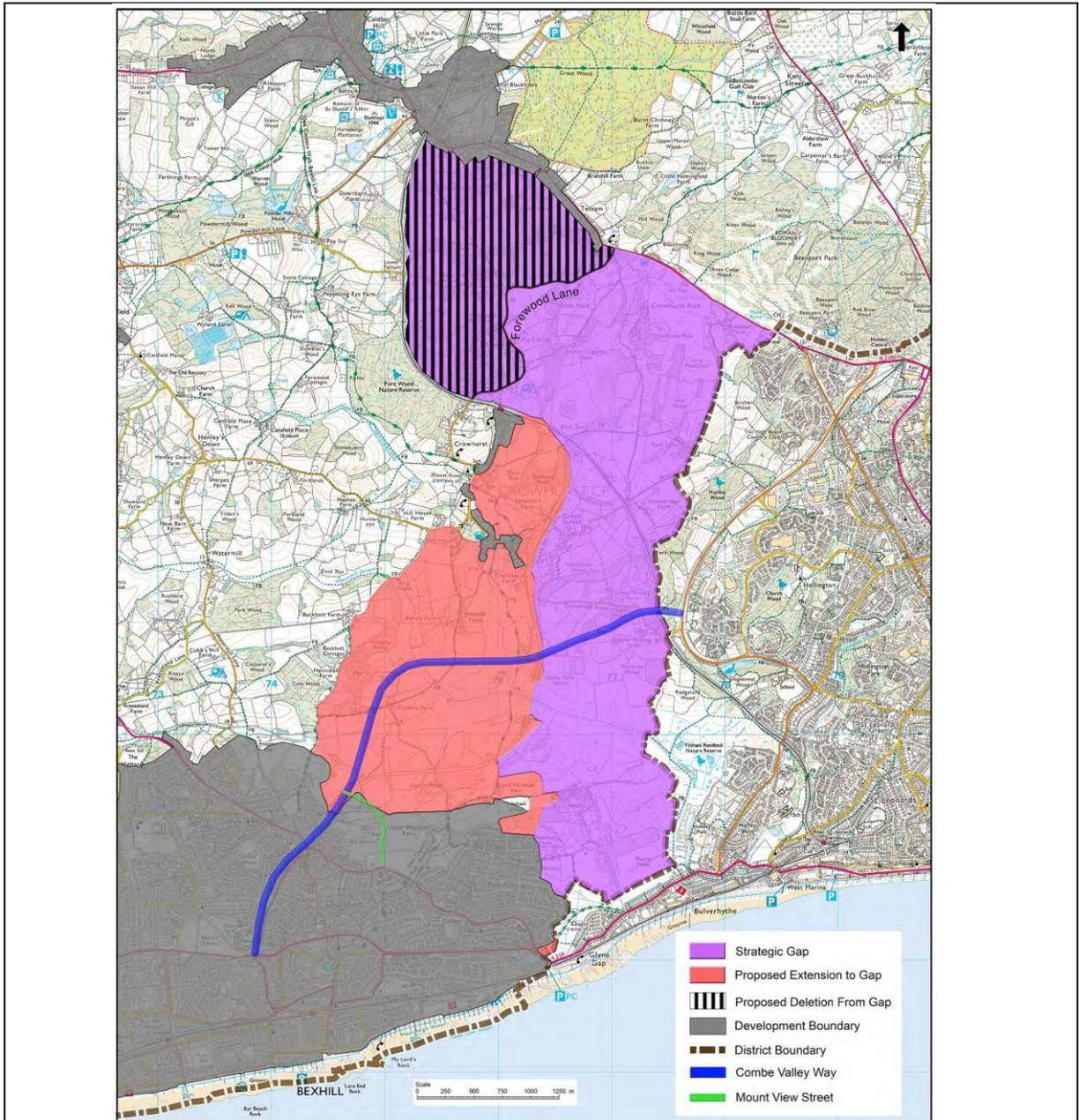
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1.5. The Battle CP Steering Group have carefully considered which areas should be designated in order to achieve the objectives described in Clause 1.1 and have taken account of the DaSA proposals (old and new).



Map 1: Extract from DaSA Local Plan Strategic Gaps Background Paper March 2016, (p67)

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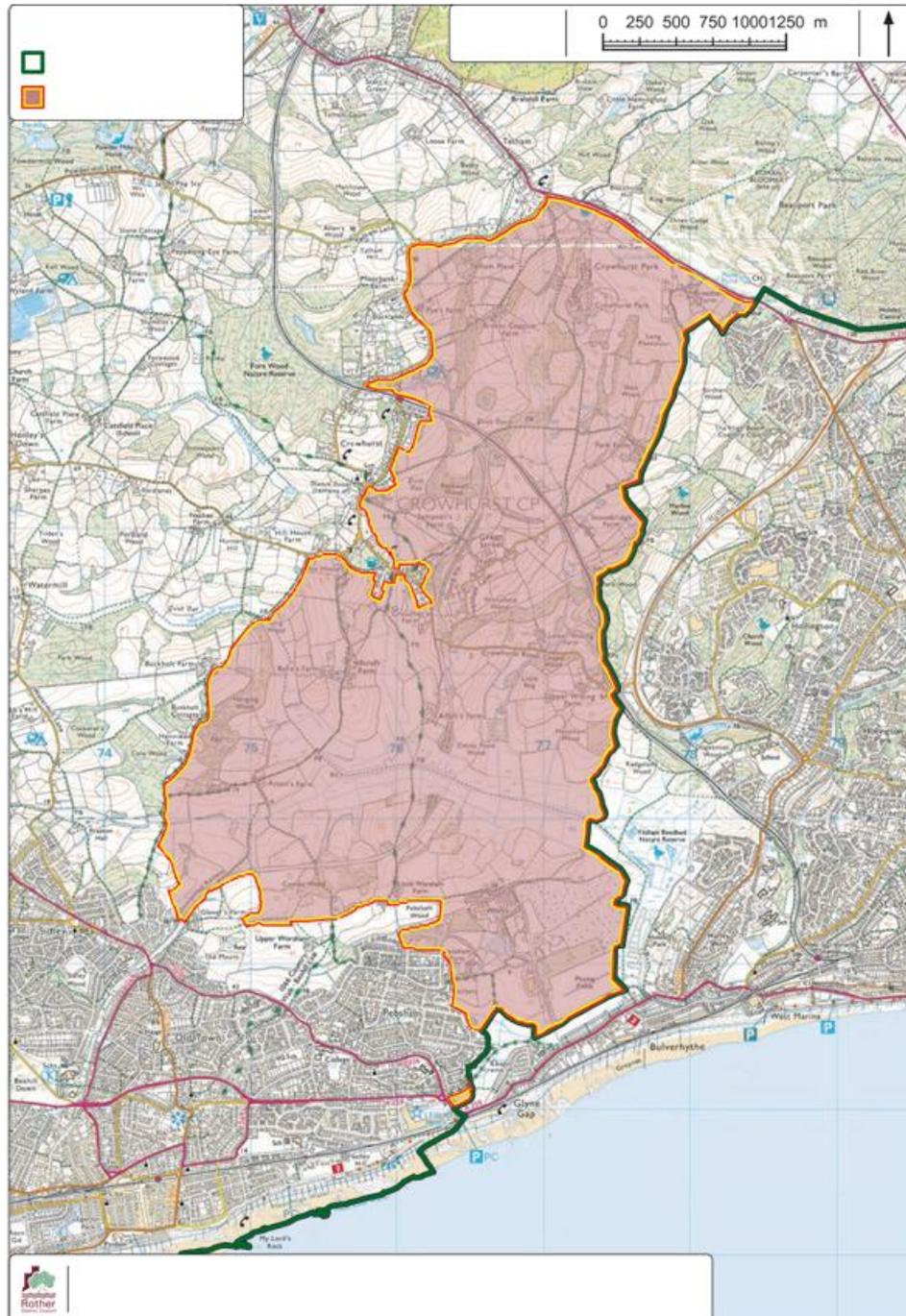
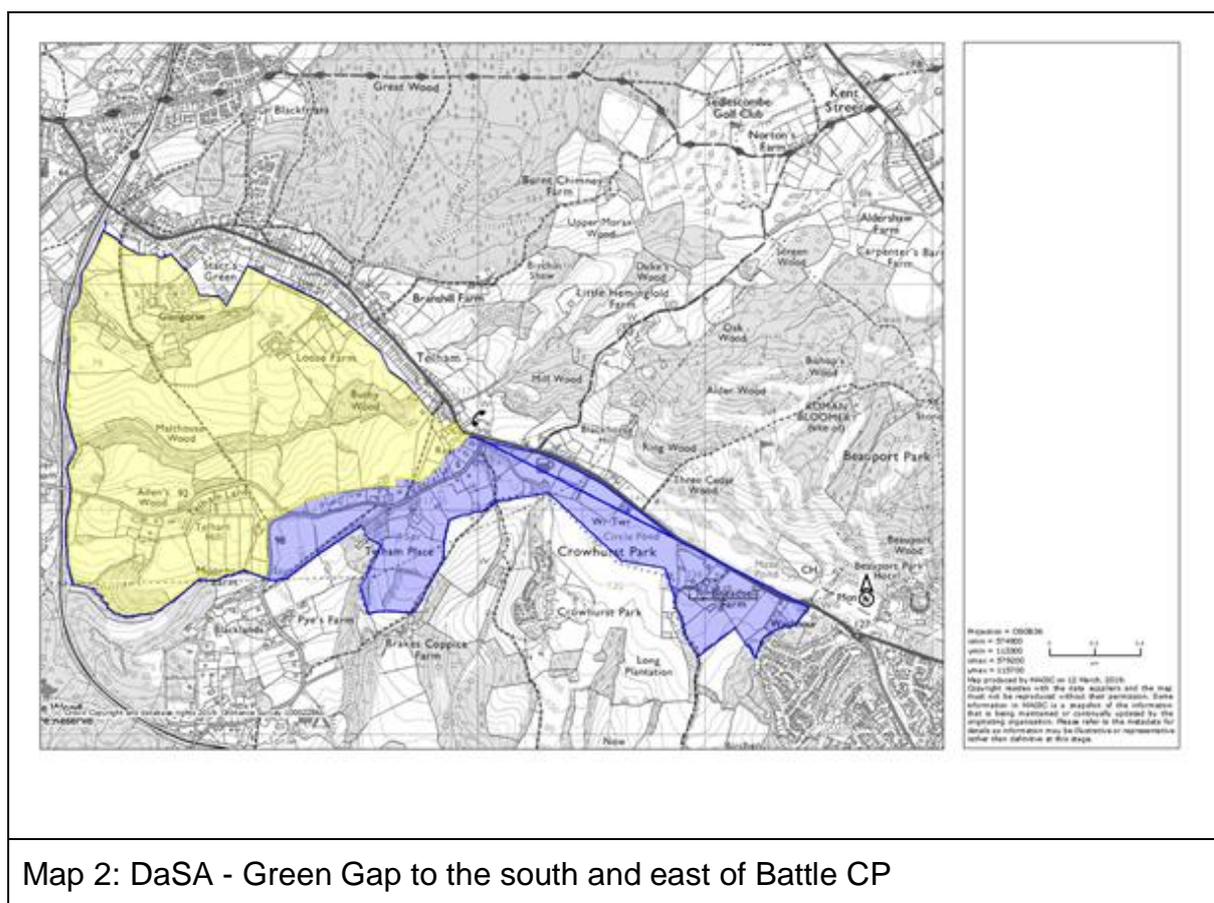


Figure 6: Strategic Gap at Bexhill, Crowhurst and Battle (2019)
(Taken from “Development and Site Allocations Local Plan Proposed Submission incorporating Main and Additional Modifications and changes to the Policies Map July 2019.”)

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2. DaSA: Green Gap to the south-east of the Battle CP

2.1. The yellow area in Map 2 indicates the area of DaSA proposed Strategic Gap removal, while the blue area indicates the retained (strategic) Green Gap within the Battle Civil Parish boundary.



2.2 The RDC argument is that: “This landscape is typical of the High Weald Area of Outstanding Natural Beauty (HW-AONB) and is clearly countryside outside the development area and therefore protected by countryside and HW-AONB policies. It is recommended that the western boundary of the Strategic Gap is reviewed to follow an alignment along Forewood Lane as this would not compromise the effectiveness of the gap between Battle and Hastings”. (Extract from: DaSA Local Plan Strategic Gaps Background Paper March 2016, clause 12.5, (p27), <www.rother.gov.uk/CHttpHandler.ashx?id=32264&p=0>)

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2.3 The Battle CP Neighbourhood Plan Steering Group were not initially convinced this would provide adequate protection from Hastings overspill. Residents were asked to use the feedback forms to give their views on this and the avoidance of ribbon development towards surrounding villages.

2.4 The questions posed on the consultation held in April 2017 feedback form and responses are shown here:

2.4.1 The distinct identities of Battle Town and the surrounding village communities should be protected by strategic gaps or wedges which would prevent further ribbon development between them?

Yes = 192; No = 2; No response = 55

2.4.2 The distinct identity of Battle Civil Parish should be protected from urban sprawl towards Hastings?

Yes = 191; No = 4; No response = 54

3. Re-examination of the south-east of the Civil Parish

3.1 It is clear from the sample above that there is support for the concept of gaps being used to meet the objectives a), b), c) as detailed in Clause 1.1. The Battle CP NP Steering Group re-examined the RDC proposal to remove a segment of the strategic gap shown in Bexhill Map 1 and decided that the remaining Strategic Gap offers sufficient protection from the sprawl of Hastings but that it did not offer adequate protection from ribbon development between Battle and Crowhurst and Battle and other surrounding villages. The Battle-Hastings/St Leonards Strategic Gap should only be amended if protection against ribbon development between Battle and Crowhurst is provided as shown in Map 3.

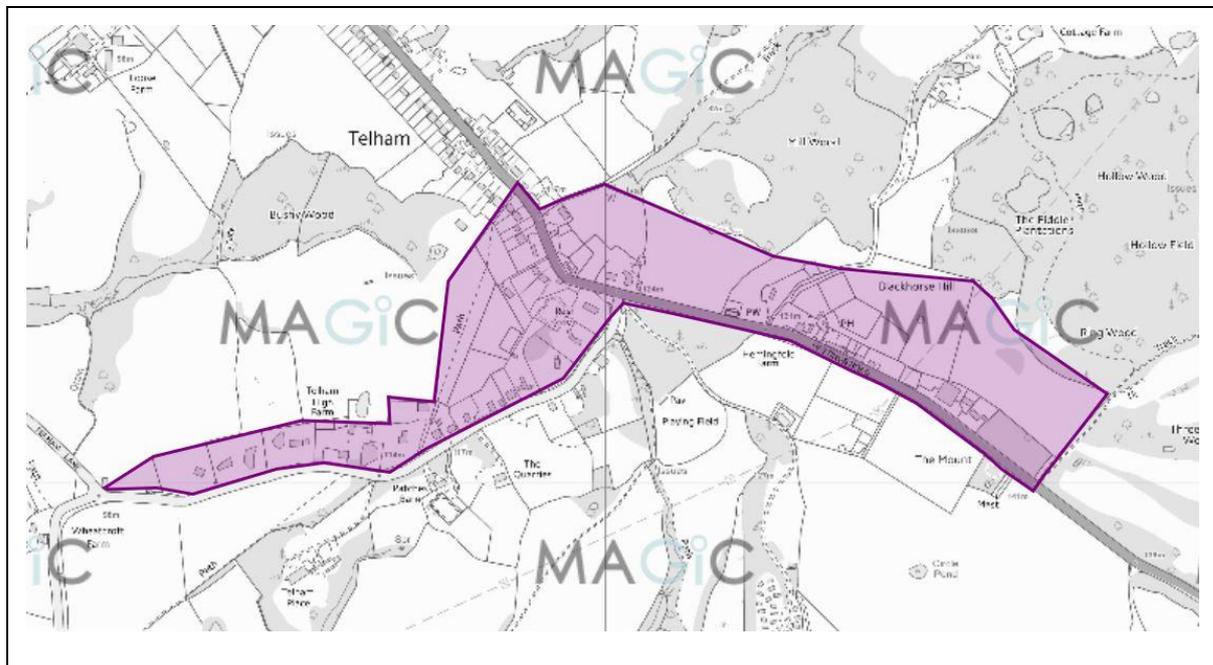
NOTE: RDC refer to the Battle and Hastings/St Leonards gap as a Strategic Gap. RDC defined strategic gaps cover a large segment of land and are a different order of magnitude to the Green Gaps that the Battle CP Neighbourhood Plan proposes.

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Map 3: Green Gap to the south-east of the CP

3.2 The shaded purple area in Map 3 includes the Telham recreation ground which, along with the surrounding land, should be maintained without development to retain the separate character of Telham. There is already almost continuous ribbon development on the south side of the A2100 but there are gaps on the north side. These should be protected by designation as a Green Gap. These no-build areas shown in this document would also prohibit the use of existing tracks or the building of new access roads to land beyond that in the shaded areas.

3.3 The following extract from the RDC DaSA Local Plan Proposed Submission incorporating Main and Additional Modifications and changes to the Policies Map July 2019, provide relevant details:

Policy DEN3: Strategic Gaps, The Strategic Gaps are identified on the Policies Map between the following areas:

- (i) Bexhill and Hastings/St Leonards, (ii) Crowhurst and Hastings/St Leonards & (iii) Battle and Hastings/St Leonards

Within these Gaps, development will be carefully controlled. Developments will only be permitted where they are unobtrusive and do not detract from the openness of the area having regard to the particular objectives of the Gaps. (see Clause 1.1 bullets a), b), c)) Enhancement of the Gaps through effective landscape management which strengthens and reinforces their significance as protected landscape areas will be supported. (ibid. p80)

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Green Gap analysis

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3.4 The Battle NP contends that additional protection is also needed for the Strategic/Green Gaps between Battle Town and neighbouring villages and settlements. The whole of the Battle Civil Parish is within the High Weald AONB. There is increasing pressure on land for development despite this designation. Examples of planning pressures will be given for each of the proposed Green Gaps that follow.

3.5 RDC in their DaSA document July 2019 state at 6.11 “National planning policy highlights the need to recognise the intrinsic character and beauty of the countryside as well as the wider benefits from natural capital and ecosystem services. Valued landscapes, which clearly include AONBs and their settings, should be protected and enhanced, which resonates with the specific provision that great weight should be given to conserving and enhancing the landscape and scenic beauty of AONBs. The National Planning Policy Framework further states that the scale and extent of development within AONBs should be limited, with planning permission not forthcoming for major developments ‘other than in exceptional circumstances’. It adds that proposals for major development should include an assessment of the need for the development, the potential to meet it in another way and the net effect on the landscape and wider environment.” (ibid. p76)

3.6 The Battle NP seeks to secure these protections in the proposed Strategic/Green Gaps that follow. RDC also state that: “6.12 While a certain level of development has already been accepted through the Local Plan Core Strategy as being capable of being satisfactorily and sustainably accommodated in and around the towns and villages within the AONB, the scope for sustainable development was found to be limited. In particular, given that the High Weald is essentially an intricate, small scale and historic landscape, **it is believed that there is little further opportunity to accommodate major development without compromising AONB objectives.**” (ibid. p76)

NOTE: The bold type was not in the original document but emphasised here for clarity.

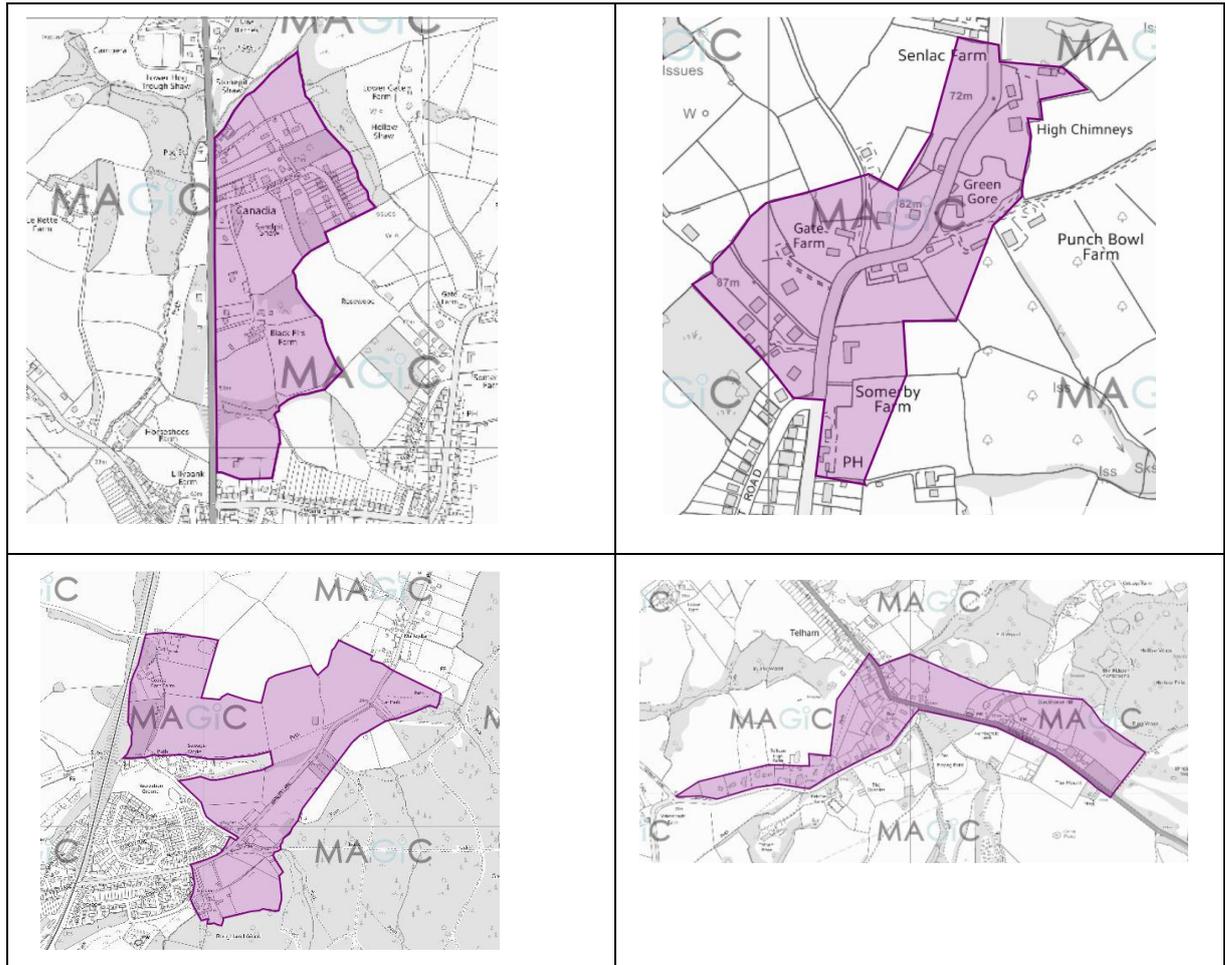
3.7 It should be noted in the RDC Local Plan that Battle over the period 2011-2028, between 475-500 new homes should be built (CS policy BA1). As at 01 April 2019 there was a residual requirement for 18 new homes (old DaSA (p123)) assuming 220 dwellings at Blackfriars are completed. All this development has been within the AONB. More developments are being approved by RDC further out from the Town Centre but still in the AONB such as those on the North Trade Road and at Lillybank Farm on the London Road. This is increasing the pressure to build extra homes on extended ribbon developments.

3.8 The analysis by AECOM in their Battle Neighbourhood Plan Site Assessment Final Report Feb 2019 struggled to find appropriate sites for development. Further encroachment on the ribbon developments towards neighbouring villages will compromise AONB objectives.

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4. Green Gaps for the whole Civil Parish

4.1 In addition to the amended Green Gap shown in Map 3, further protections are needed to maintain the separate identities of surrounding villages and Battle.

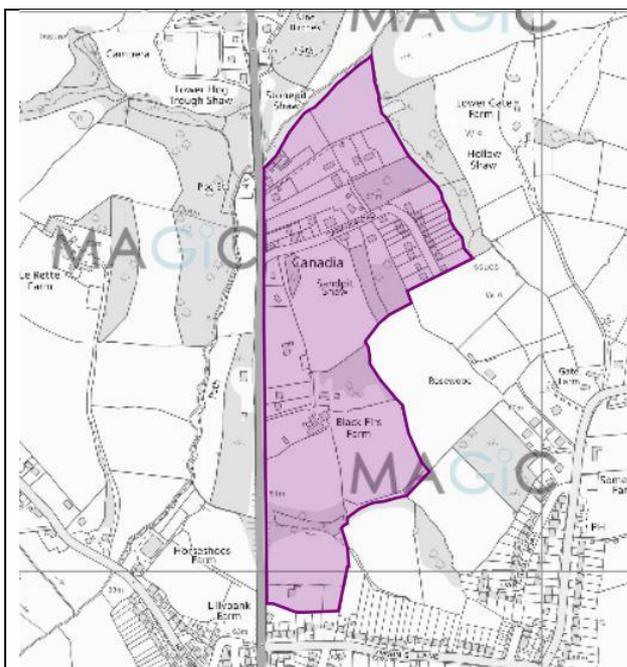


Map 4: Green Gaps 01, 02, 03, 04 for the whole Civil Parish

4.2 The original DaSA derived Strategic Gaps and the following new and amended maps assume the (strategic) Green Gaps now defined are not only no-build-areas in their own right but also do not offer the potential for an access road across the green gaps to more remote building sites. This definition will offer further security from urban sprawl to/from neighbouring villages. However it is recognised that not all development is completely ruled out e.g. development of associated with countryside uses such as agricultural and leisure is allowed. Similarly planning policy can allow development on the outer edges of a settlement as “exception sites”.

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5. Green Gap 01 - Battle north – east of A2100 (London Road)



Map 5: GG01: Battle north – east of A2100 (London Road, north to Civil Parish boundary which adjoins Mountfield.)

(from Virgins Lane development boundary edge to River Line near pumping station and Brooklands (a distance of 0.5 miles))

- 5.1 Development pressure demonstrated by extra housing approved by RDC at:
- RR/2000/1546/P Lillybank Farm, London Road, Battle outline: residential development with new access to London Road ~ REFUSED
 - RR/2016/725/P London Road - Land to the west of Lillybank Farm, Wattles Wish, TN33 0JG Outline: Residential development with associated open space on land to the west of London Road, with all matters reserved other than access ~ APPROVED CONDITIONAL
 - R/2017/1136/P London Road - Land to the west of, Lillybank Farm, Wattles Wish, TN33 0JG Application for approval of reserved matters following outline approval RR/2016/725/P for residential development of 50 dwellings - details of the landscaping and appearance, layout and scale~ APPROVED CONDITIONAL
 - RR/2011/2495/P Oaklands Annexe ~ APPROVED

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5.2 Development pressure is also demonstrated by an application to the BCPNP for the building 188 – 282 dwellings at Blackfirs Farm. The application was received well after the closing date of the call for sites and after the commissioning of an external consultant, AECOM, had begun to shortlist potential sites for development. The land was not considered for allocation because of these factors and because it was within this proposed Green Gap.

5.3 Landscape vulnerability

5.3.1 Local landscape character area description, including aesthetic factors and detractors.

Green Gap 01 is in heavily wooded countryside between the north edge of Battle and the Civil Parish boundary with Mountfield one mile away. The area is criss-crossed by watercourses associated with the River Line and acts as Gateway into Battle. Much of the area has an intimate and enclosed character with distinct field patterns and small fields divided by trees and hedges. The A2100 is heavily screened by high level vegetation forming a long green corridor on both sides of the road but is more open in the southerly borders of the proposed gap.

There is strong evidence of development pressure with the granting of planning permission for 50 homes at Lillybank Farm just outside the proposed green gap on the other side of the road.

Within the proposed green gap an application was made to the Battle Civil Parish Neighbourhood Plan Steering Group for the building of between 188 – 282 homes on land around Black Firs Farm. (See Clause 6.2).

There are some detracting features such as the border edge with the A2100 and the residential development at Canadia Road with over 26 dwellings but it is well screened from the main road. Despite this development, the rural character has been preserved.

5.3.2 Landform: The area is characterised by gently rolling High Weald countryside.

5.3.3 Landcover: This is a mix of arable and pasture land, pleasant pastoral landscape. The historic pattern of woods, hedges and gives the impression of a heavily wooded landscape.

5.3.4 Landscape Condition: The condition is of generally well managed and farmed landscape.

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5.3.5 Settlement (Buildings, densities, size of settlements), impact of urban edges on countryside: The southern urban edges are delineated by a residential development in Virgins and Bowmans Drive. Towards the northern segment, settlement density decreases along the A2100 and dwellings are largely set back and well screened until the Canada development. The southerly edge along the A2100 is more open and less well protected by intervening vegetation.

5.3.6 Landscape Value: The area is within the High Weald AONB and is of high landscape value.

5.3.7 Landscape Character Sensitivity: The area would be sensitive to change especially on the more open areas and the higher ground and ridges.

5.3.8 Gateways: The most pronounced gateway is entering the built up edge of Battle from the London Road.

5.4 Visual appraisal

5.4.1 Visual sensitivity and visual barriers: The area is of relatively high sensitivity from the A2100. The uninterrupted view is of straight road straddled by uninterrupted dense woodland. In the southern segment there are views into parts of the green gap which would be sensitive to intrusive development.

The site is very exposed to the open countryside to the north.

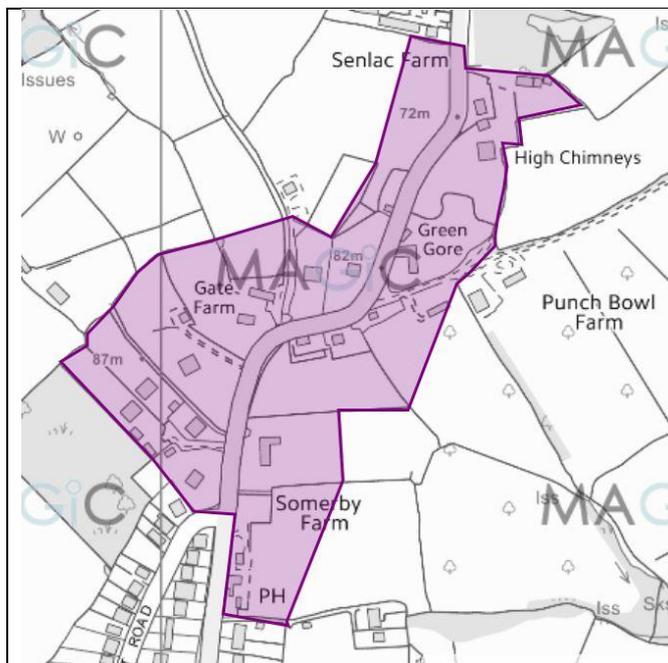
This is a relatively undeveloped verdant setting for the town. Whilst there are limited public viewpoints within the countryside to the north of the green gap the policy protection for the setting and settlement edge of Battle does not depend on such public access.

The planning inspector at an appeal for a development in the proposed green gap stated that it “would cause significant harm to the character and appearance of the area and would not conserve the High Weald AONB. This would conflict with the aims and objectives of Policies BA1, EN1 and EN3 of the Core Strategy as set out above. It would also conflict with paragraph 115 of the National Planning Policy Framework which places great weight on the conservation of landscape and scenic beauty in Areas of Outstanding Natural Beauty.” (RR/2015/1419/P)

Despite the above protection, development was subsequently allowed with a revised scheme (RR/2016/3208/P).

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6. Green Gap 02: Battle – north-east (Whatlington Road)



Map 6: Green Gap 02 Battle north-east (Whatlington Road)

(from edge of development boundary on Whatlington Road with its junction at Oakhurst Road to Civil Parish boundary crossing Whatlington Road at Green Man Cottage North of Senlac Farm track)

6.1 Development pressure is demonstrated by extra housing or listed building development consents that have been approved by RDC at:

- RR/2012/370/P, RR/2011/1934/P & RR/2012/2063/P Gatehouse Lodge, 3 new dwellings ~ APPROVED
- RR/2015/3123/P Cornerwood Farm, New dwelling ~ APPROVED
- RR/2019/1777/P The Old Barrack Inn, Conversion of existing garage building to form residential dwelling with associated alterations including addition of roof dormers and widened vehicular access ~ APPROVED CONDITIONAL
- RR/2019/1735/L Gate Farm Barn, Demolition of existing building and erection of replacement dwelling as an alternative to the scheme approved under RR/2016/2973/L ~ LISTED BC GRANTED

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6.2 Landscape vulnerability

6.2.1 Local landscape character area description, including aesthetic factors and detractors.

The Green Gap is 0.3 mile between the development boundary and the Civil Parish Boundary and 1.2 miles to the River Line in Old Whatlington. The land descends 203 feet to the river valley and is a mix of agricultural with some vineyards and woodland including some which is designated as ancient. The Green Gap follows a meandering road that is flat before the dip into the valley.

There are two ancient farmsteads in the landscape. Views to the east can be seen at the Punch Bowl Farm track down towards Petley Wood which is designated as ancient woodland.

The area has an intimate and enclosed character with distinct field patterns and small fields divided by trees and hedges. Whatlington Road is an ancient routeway and is in part narrow, deeply sunken, and edged with trees, hedges, wildflower-rich verges and boundary banks. Another ancient routeway branches off at Gate Farm and a public footpath follows much of the original track.

Ribbon development is strung out along Whatlington Road between Mount Street in Battle and Whatlington village with some larger houses being built in place of smaller original dwellings or as extensions to more modest buildings.

Gate Farm and the converted Gate Farm Bungalow retain significance within the landscape as an example of the "scattered farmsteads" that historically characterised the Brede Valley. Although the farm has some C20 ribbon development either side, the character and materials of Gate Farmhouse and its outbuildings are readily distinguished from the more modern dwellings, allowing the site to be easily interpreted as an historic landscape feature.

There are no detracting features. The railway line to the east is in a deep cutting and has little impact on the landscape.

Ribbon development pressures and gentrification are threatening the rural character notably on eastern side of Whatlington Road just before the proposed green gap.

6.2.2 Landform: The area is characterised by gently rolling high weald countryside which is cut through by the Battle – Whatlington Road (north/south) and River Line (west/east).

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6.2.3 Landcover: This is a mix of arable and pasture land, pleasant pastoral landscape. The historic pattern of woods, hedges and narrow lanes and farm tracks gives the impression of a heavily wooded landscape.

6.2.4 Landscape Condition: The condition is of generally well managed and farmed landscape. There is evidence of pressure for agricultural diversification with some derelict farm buildings and applications for the conversion of these.

6.2.5 Settlement (Buildings, densities, size of settlements), impact of urban edges on countryside: The Green Gap is set hard against the current development boundary. The ribbon development is less dense on its descent towards Whatlington with gaps in the hedgerow that provides views of the landscape on both sides of the road.

6.2.6 Landscape Value: The area is within the High Weald AONB and is of high landscape value.

6.2.7 Landscape Character Sensitivity: The area would be sensitive to change especially on the more open areas and the higher ground and ridges and in the valley following the River Lane and associated waterways.

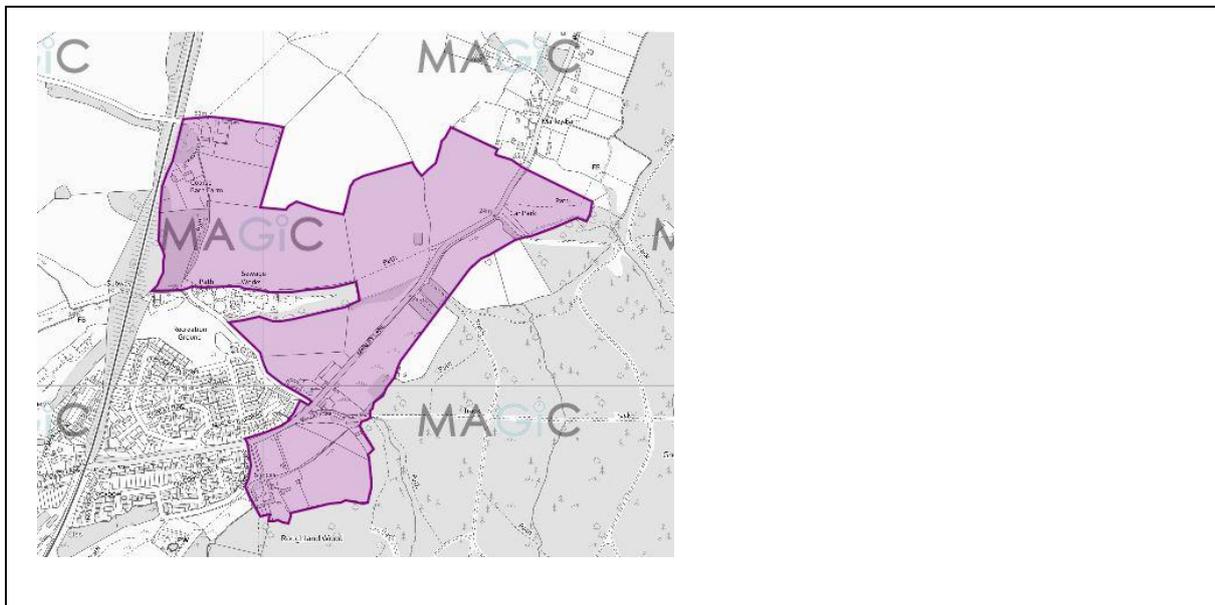
6.2.8 Gateways: The most pronounced gateway is leaving the built up edge of Battle before arriving in Whatlington village. There is a pedestrian gateway into open countryside on the west from Gate Farm northwards to Lower Gate Farm alongside a farm track and then into open countryside following the line of an ancient routeway.

6.3 Visual appraisal

6.3.1 Visual sensitivity and visual barriers: There are a number of gaps in the hedgerow along the road which give long views across the country side but there are more vantage points as the footpath from Gate Farm rises and there are views across to the ancient woodland at Petley Wood. There are views into parts of the gap which would be sensitive to intrusive development.

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7. Green Gap 03 - Battle east (Marley Lane)



Map 7: Green Gap 03 Battle east (Marley Lane)

NOTE: The proposed GG comprises a mapped area following the Reg 14 consultation response from Southern Water who believe extra space may be required at their Water Treatment Works (WTW) site, subject to detailed design to satisfy the Blackfriars development of up to 220 dwellings.

This GG is specifically designed to protect views of Battle from the east, north and south; the boundary of the GG abuts the Southern Water WTW site fence on these sides and the GG includes all mature hedge-lines and trees that surround the site and provide a vital 'green barrier'. Footpath Battle FP57 remains unaffected and remains within the designated GG. If any development on the Southern Water WTW site takes place, particular care regarding design must ensure the hedges and mature trees adjacent to the site are not damaged in any way.

7.1 Development pressure demonstrated by extra housing that has been approved by RDC at:

- RR/2016/274/P (TEMP ACCOM) Mobile home to business & temp residential accommodation ~ APPROVED
- RR/2019/241/P Marbat 1 new dwelling ~ APPROVED

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7.2 Landscape vulnerability

7.2.1 Local landscape character area description, including aesthetic factors and detractors.

This Green Gap, sits to the east of the town and the current urban development which is dominated by the 'Coronations Gardens' housing and recreation ground to the north of Marley Lane, west of the railway. The GG area concerned, east of the railway has only a very small number of dwellings, mostly south of Marley Lane, comprising an eclectic mix of dwellings: Blackfriars, Stuart House and Oast House. Meanwhile the large Blackfriars development (RR/2019/604/P) to the south-west is expected to dominate the landscape south of Marley Lane and be partially visible from the higher parts of this GG. Marley Lane as it leaves the town and crosses the railway at a level crossing slightly descends into a deep hedged roadway with no dwellings on either side for some 300 metres and then ascends to a high point at the eastern most point of the GG, just east of the Forestry Commission Great Wood car park (with day-long high usage for people walking in the wood). It is this slightly higher ground that has exceptional views to the north across several, for the High Weald large arable fields (>5 ha) and to the south the northern edge of Great Wood - a dominant PAWS woodland (186 ha) in the Civil Parish with both conifer and deciduous trees that are highly visible in form.

7.2.2 Landform: The GG area's landform is that of an open structured hollow between higher land formerly occupied by Coarse Barn Farm and Marley Farm to the north and wet (stream-fed) grassland to the south under the higher edge of the open access land of Great Wood.

7.2.3 Landcover: The area to the north of Marley Lane is open arable farm land dominated near the road by grass, while higher land is under 2/3 year crop rotation. Adjacent to the roadside sits a modern Grain Store. To the south of Marley Lane, a small field structure of water-meadow below the woodland in long term lay-grassland is under minimal cultivation.

Remarkably, due to extensive and dense mature tree hedge lines there are no built sights except the Grain Store roof, not even the Sewage Works which is within the area but fully screened from Marley Lane and the Great Wood car park.

7.2.4 Landscape Condition: The area indicates that several larger fields are under well managed farmed operations and several smaller fields under minimal cultivation – some not even cut for hay, for several years and thus supporting a good range of grasses and wild flowers.

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7.2.5 Settlement (Buildings, densities, size of settlements), impact of urban edges on countryside: The area contains an Oast House, the closest one to the town of Battle, now converted to a dwelling. Several farm houses, barns and stock buildings are contained in the area – and now converted to dwellings and storage requirements. Notably a heritage building – the former home of England’s first female firefighter is included. Development pressure is evidenced by a recent Planning Application (RR/2019/1128/P) to convert a garage which was a former pig shed into a holiday cottage which was refused by the LPA and dismissed at appeal. Over recent years there have also been multiple PAs regarding the properties adjacent to Blackfriars Oast.

7.2.6 Landscape Value: The GG has a high value landscape – providing wide angle views of Great Wood. The area provides an important landscape, combining, very close to Battle town, a successful mix of productive arable farming, forestry access and recreational views.

7.2.7 Landscape Character Sensitivity: The landscape is exceptionally free of buildings yet very close to urban development and, due to the extensive mature tree hedge lines, provides at a number of places a surprising, for the High Weald, short distance 360° wide green view.

7.2.8 Gateways: The GG has Marley Lane running through its centre; this road carries significant traffic volumes to/from the A21 to the east, between Battle town west of the area via a level crossing over the railway. In essence despite no current signage the area is seen as a natural Green Gateway to Battle’s urban development, to which it directly borders. The impact of the GG being a gateway to Battle will be increased when local vehicle movements increase due to the development of the Blackfriars developments.

7.3 Visual appraisal

7.3.1 Visual sensitivity and visual barriers: Even very low density building within the area proposed could very significantly alter the visual character to the detriment of all who see the area as being the “real countryside” that is highly accessible to recreation use with local footpaths through the area and the included car parking for Great Wood visits. Any, even very low density development, along this part of Marley Lane would inevitably damage the intrinsic value and characteristics of this GG.

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Green Gap analysis

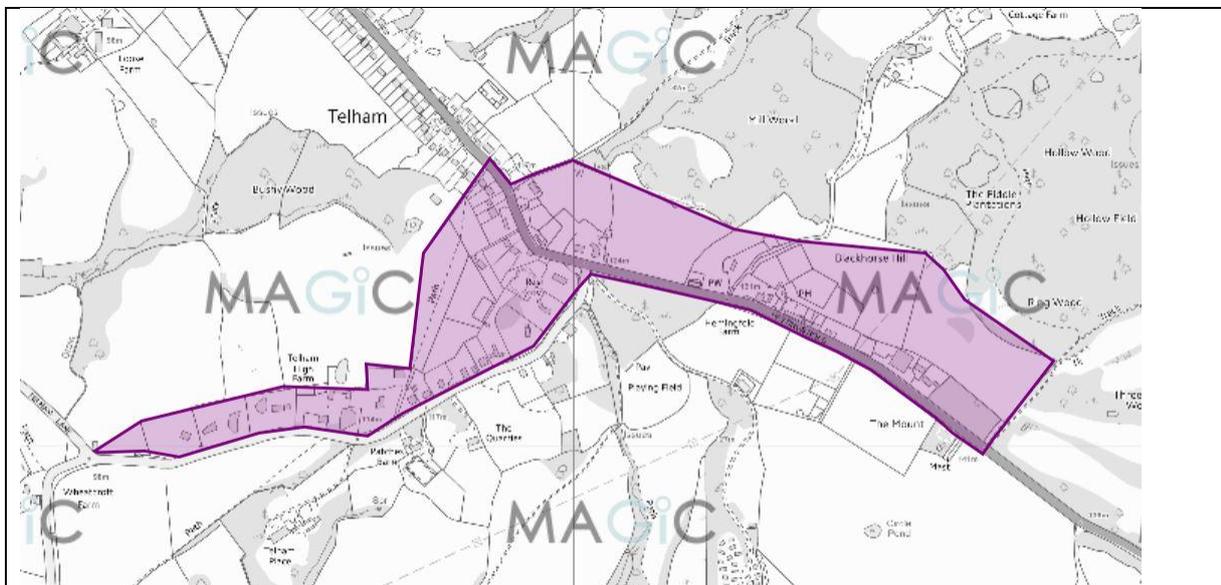
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From Harrier Lane eastwards Marley Lane dips down into a “tunnel of high hedging” which for a driver offers no clue of the sudden revelation of wide views across open farmland and higher up to Great Wood. Further to the east beyond this GG, Marley Lane takes on a different character of properties on both sides forming a very low density of developments, whereas the area proposed is free of dwellings and other properties adjacent to the road.

8. Green Gap 04 - Telham – A2100 and Telham Lane



Map 8: Green Gap 04 Telham – A2100, Hastings Road and Telham Lane

8.1 Development pressure in Telham Lane is demonstrated by extra housing that has been approved by RDC at:

- RR/2014/263/P Lower Telham Farm Agricultural building to 1 holiday let ~ APPROVED
- RR/2018/2297/P Telham High Farm Annexe to holiday let ~ APPROVED.

8.2 Development pressure encountered from Neighbourhood Plan Call-for-sites but not accepted for inclusion: BA NS 101 Land at the Cedars Telham Lane (AECOM map (p20) assessment (p27))

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8.3 Development pressure is demonstrated by extra housing that has been approved by RDC at:

- RR/2014/2671/P 140 Hastings Rd Bungalow to 4 dwellings ~ APPROVED
- RR/2014/2036/P Bungalow to 4 dwellings ~ APPROVED
- RR/2013/1809/P Bungalow to 4 dwellings ~ APPROVED
- RR/2016/196/L Hemingfold Farm, Barn to annex & holiday let ~ LISTED GRANTED
- RR/2015/3007/P Barn to Annex & holiday let ~ APPROVED

8.4 The Green Gaps in the ribbon development north of Telham Lane are not as clear as those in the south. However, there is a clear gap between 145 and 149 Hastings Road on the east side where there is a history of unsuccessful planning applications at Telham Farm. (See above and maps in the Appendices.) There is also a pattern of back filling behind the ribbon development dwellings and gardens on both sides of the road.

8.5 On the west side north of Telham Lane the recreation field owned by Battle Town Council has been proposed as a designated local green space and has clear views towards open countryside. There is evidence of backfill development on land beyond the gardens on this side of the road as shown in Appendix A.1 which threatens the amenity value of this valued public site and consolidation of the ribbon development.

8.6 Landscape vulnerability

8.6.1 Local landscape character area description, including aesthetic factors and detractors.

This Green Gap covers the far east of the Battle Civil Parish (CP) either side of one of the three main road “entrances” to the Civil Parish. It comprises a high contour ridge above the surrounding countryside, with areas north and south of the A2100 Hastings Road that adjoin one another adjacent to the Telham Lane junction.

These areas are of distinct landscape types and thus referred to, herein as: ‘GG04-north’ and ‘GG04-south’. Extensive views to the north from ‘GG04-north’ provide typical High Weald fields and forest impressions; while to south-west from ‘GG04-south’ views as far as Beachy Head can be seen with closer views of Battle Abbey gatehouse.

Additionally the area adjoins the Battle and Hastings/St Leonards Strategic Gap to the east of Telham Lane where parkland dominates and south of the Hastings Road where farmland is the main visible feature. In the vicinity of Telham Lane low density ribbon dwellings are arrayed along the A2100 and provide an eclectic mix of architectures, many in the vernacular of previous centuries.

All these landscapes are visible through the intermittently hedged route with extensive views through the gaps along the route.

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8.6.2 Landform:

GG04-north: north of the A2100 Hastings Road the adjacent fields provide an open area between the road and woodland at a lower altitude, enabling distant views across the High Weald landscape.

GG04-south: the area to the west of Telham Lane includes new infill housing and older dwellings, loosely ribbon developed as the lane gradually descends; however situated within the higher ground is SSSI Blackhorse Quarry (0.19Ha adjacent to a covered reservoir) and the BTC Telham recreation ground and Public Right of Way Battle FP which has a view for considerable distances to the south-west as the High Weald gives way to the coastal plain.

8.6.3 Landcover:

GG04-north: the area is open arable farm land dominated near the road by lay grass, used occasionally for sheep grazing. Just outside the GG there is extensive woodland at a lower altitude. There is little or no arable crop rotation activity within the GG area.

GG04-south: the area to the south-west comprises mostly dwelling curtilages with some horse grazed grassland. Nevertheless it also includes a recreation ground with children's play area and a footpath on its western edge with stunning distant views.

8.6.4 Landscape Condition: The landscape from both sides of the A2100 whilst significantly different offers the highest quality non-intensively managed countryside interspersed with small scale dwellings mostly below the highest terrain that allow impressive views of the surroundings for very good distances.

8.6.5 Settlement (Buildings, densities, size of settlements), impact of urban edges on countryside:

GG04-north. There have been several property extensions over the last five years or so along Telham Lane which suggests a potential propensity for development.

GG04-south: the track at Blackhorse Hill that leads to the SSSI Hemingfold Meadow 4.9 Ha meadow grasses and wildflowers some 600m distant is included within the area concerned.

Development pressure is evidenced by several recent Planning Applications: RR/2018/2041/P – a refused infill site and RR/2018/2051/A to east of

8.6.6 Landscape Value: The GG has high value landscape – providing long distance views across the High Weald to the north and views to the coast in a south-westerly direction with the A2100 ridge itself being the natural border between the two.

...continued

8.6.7 Landscape Character Sensitivity: The landscape is not entirely free of buildings but scattered dwellings, give the countryside views a sense of being lived in and cared for. Any modern developments within view would be potentially intrusive on the big countryside views and would be particularly concerning from a light pollution viewpoint.

8.6.8 Gateways: GG04 has the A2100 Hastings Road running through east-west which carries high traffic volumes all day long. Additional traffic from developments adjacent to the GG would require visibility splays that may have the potential of damaging reducing the roadside hedging which is an intrinsic feature of the countryside feel of this GG.

8.3 Visual appraisal

8.3.1 Visual sensitivity and visual barriers: Even very low density new building within the area proposed could very significantly alter the visual character to the detriment of all who see the area as being the “real countryside”, that is highly accessible to recreation use with local footpaths through the area and included a “sub-village green” at the junction of Telham Lane and the Hastings Road.

An unparalleled visual experience when travelling by the footway or roadway between Battle town and the more urbanised St Leonards/Hastings area is gained by the unspoilt intermittent low density ribbon of housing and green views.

Any, even very low density development, along this route would inevitably change the intrinsic value and characteristic of this GG.

...continued

9. Summary

9.1 The applications that have been approved in or near the proposed green gaps above have been made despite the reservations of RDC. A certain level of development has already been accepted through the Local Plan Core Strategy as being capable of being satisfactorily and sustainably accommodated in and around the towns and villages within the AONB. However RDC found the scope for sustainable development was limited. (DaSA 2019) They emphasised that given that the High Weald is essentially an intricate, small scale and historic landscape, they believe that there is little further opportunity to accommodate major development without compromising AONB objectives. The Neighbourhood Plan contends that further protection by Green Gaps is required.

9.2 Applications refused by RDC have been amended, appealed and resubmitted and this has added pressure on the AONB and ribbon development. Lillybank Farm, a development of 50 dwellings, was initially refused by RDC but now has planning permission. (See Clause 5.1) This land would have been considered for inclusion in the Green Gap 01 Battle – north, if it had not already been given planning permission.

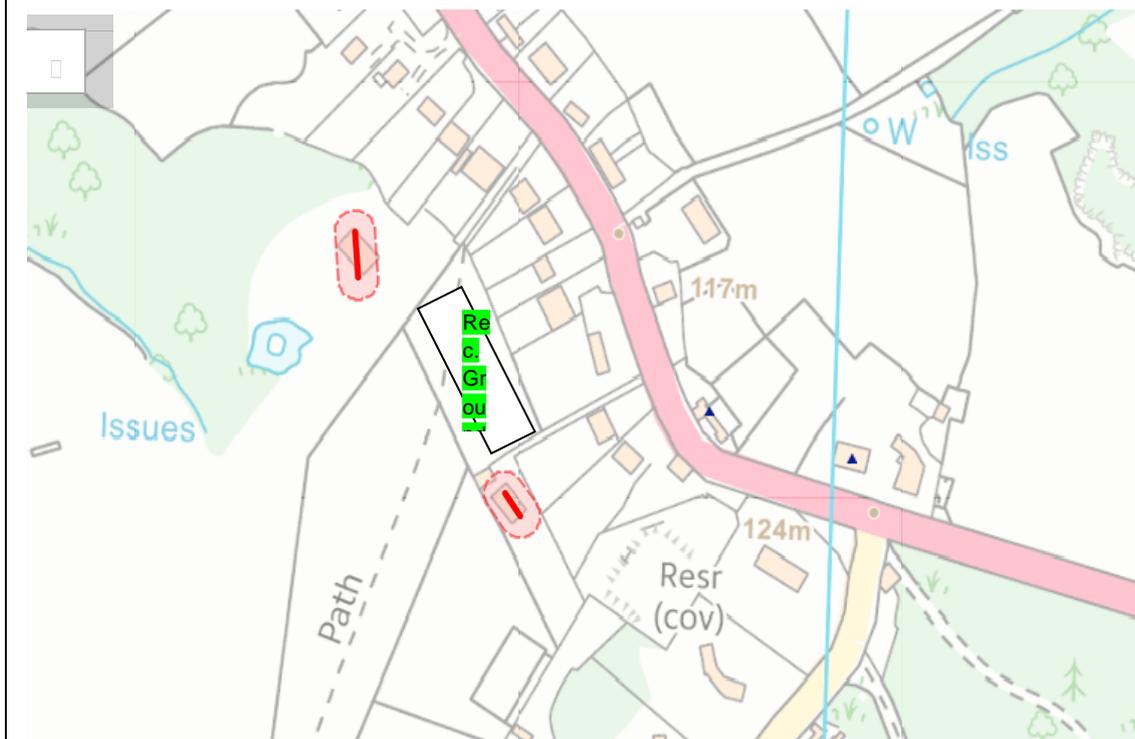
9.3 The identified Green Gaps assume these are not only highly restricted build areas in their own right but also do not offer the potential for an access road **across** the Green Gaps to more remote building sites behind the current ribbon development. (See Appendix A.1 to A.3) All the above will offer further security from urban sprawl to neighbouring villages.

Within these gaps, development will be carefully controlled and only be permitted in exceptional circumstances. Any development must be unobtrusive and not detract from the openness of the area and, unless it is essential to meet necessary infrastructure needs and no alternative visible site is available.

*...continued
Appendices on following pages*

Appendices

Appendix A.1



Detail of Map 8 – example of backfill (marked red) behind ribbon development Hastings Road north of Telham Lane west side and position recreation ground

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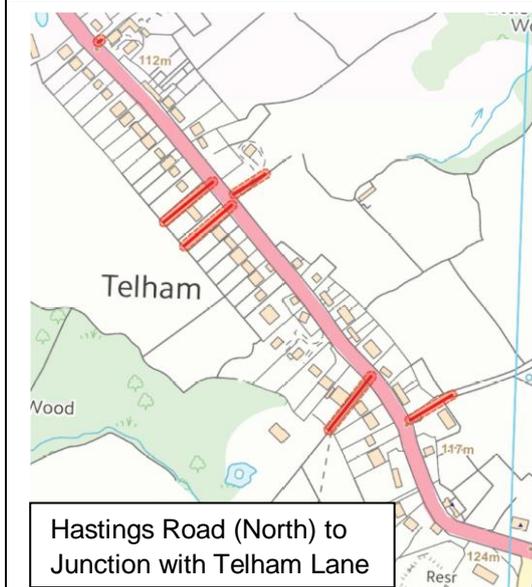
Green Gap analysis

(formerly titled Green Gap/Strategic Gap)

- version 5.0



Appendix A.2



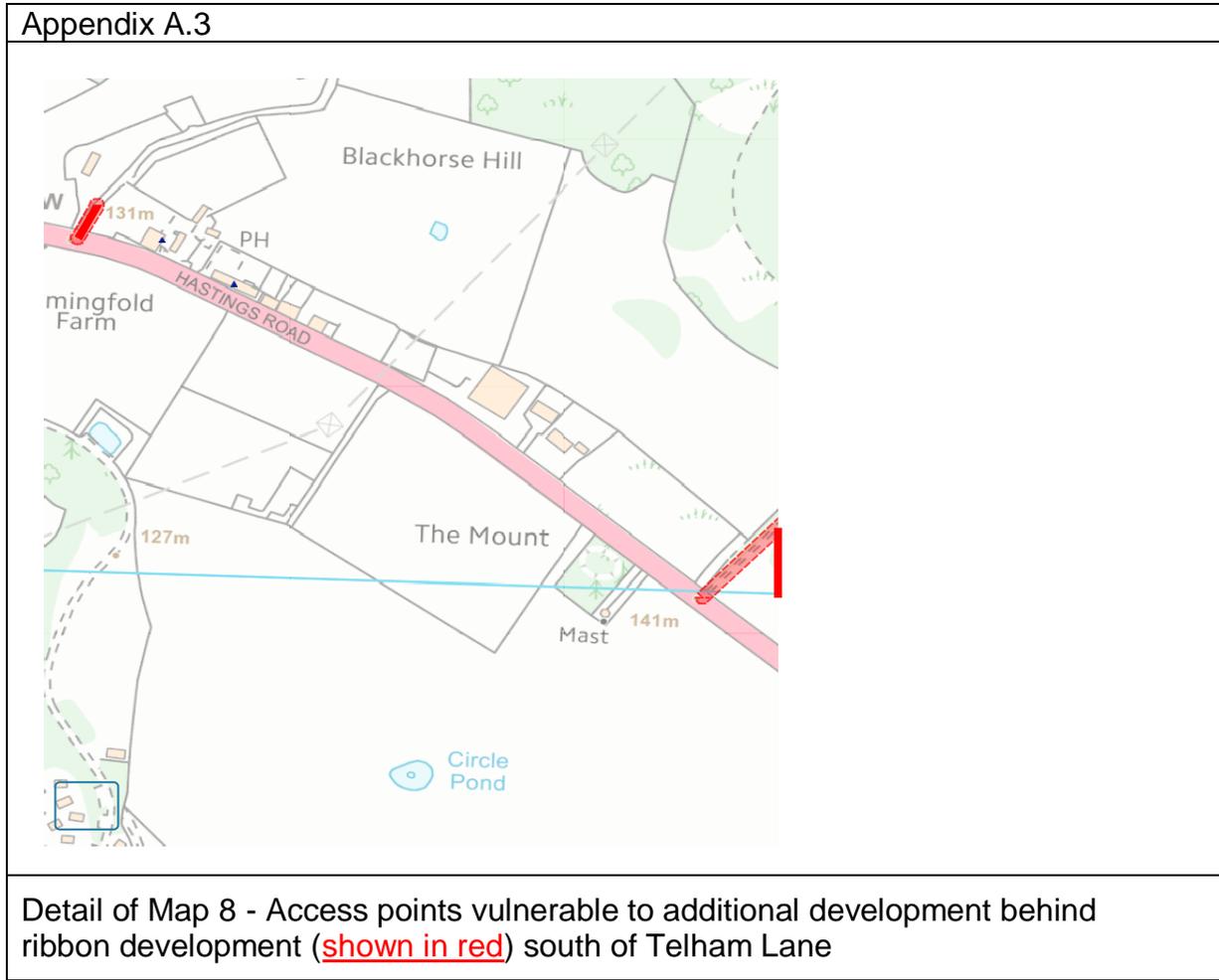
Detail of Map 8 - Access points vulnerable to additional development behind ribbon development (shown in red) north of Telham Lane

...continued

Green Gap analysis

(formerly titled Green Gap/Strategic Gap)

- version 5.0



Revisions / Versions:	
Date	Item
2019-11-28	Newly drafted document, supersedes: a) Green Gaps (aka Strategic Gaps) Maps - version 1.2 <u>and document</u> b) Strategic Gap analysis – version 3 - following advice from RDC – now version 4.1 [AR/BM]
2020-06-19	Edited (p. 10 road number corrected) and updated. Area GG03 amended and title description following Reg 14 Consultation response from Southern Water, now has explanatory text. - now version 4.2 [BM]
2020-10-07	Title edited – to clarify document's focus on Green Gaps. Minor edits resulting in body text - now version 5.0 [BM]