

Battle Civil Parish

Neighbourhood Plan 2019-2028

CONSULTATION STATEMENT

Published by Battle Town Council for the Reg.15
Plan Proposal Submission under the Neighbourhood
Planning (General) Regulations 2012 and in
accordance with EU Directive 2001/42

NOVEMBER 2020

Battle Neighbourhood Plan



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Introduction and Background

This Consultation Statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012. Section 15(2). Part 5 of the Regulations sets out what a Consultation Statement should contain:

- (a) contains details of the persons and bodies who were consulted about the proposed Neighbourhood Development Plan;
- (b) explains how they were consulted;
- (c) summarises the main issues and concerns raised by the persons consulted;
- (d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed Neighbourhood Development Plan.

This statement has been prepared by Battle Steering Group on behalf of Battle Town Council to accompany its submission to Rother District Council of the Battle Civil Parish Neighbourhood Plan (Battle CP NP) under section 15 of the Neighbourhood Planning Regulations 2012. As part of the formal submission of the BCPNP for Examination, there is a requirement for the Town Council, as the 'qualifying body' to illustrate that they have consulted with the community and relevant bodies.

NOTE: This document represents a "snapshot" of consultees comments and Steering Group responses. It should be noted that in the Regulation 14 Pre-Submission document, the word "Objective" was used in two different contexts. As a result, the Community Aspirations section has been edited to remove "Objective" and insert "Ambition".

01 Objectives of the communication and engagement strategy

1.0.1 The aim of the BCPNP communication strategy was to have a clear framework which showed how the Steering Group would involve as much of the community as possible throughout all consultation stages of Plan development so that the Plan was informed by the views of local people and other stakeholders from the start of the Neighbourhood Planning process.

A communication strategy was established to:

1. promote a high degree of awareness of the project;
2. invite residents to join the team advising the Town Council;
3. encourage everyone to contribute to the development of the Plan;
4. promote consultation events;
5. provide regular updates on the status of the Plan and its development.

1.0.2 The objectives of the Communication and Engagement Strategy are to:

- Provide better communications which meet the needs of the target audience, ensuring a better understanding of their requirements and the outcomes we deliver
- Deliver a plan which is understood by all
- Allow the community and other interested parties the opportunity to help formulate the plan
- Ensure that all stakeholders are aware of how the process works and who is taking the plan forward on their behalf
- Provide appropriate consultation and communications to all stakeholders on the progress of the Neighbourhood Plan at each and every stage which includes gathering their approval
- Engage with Rother District Council on how the consultation, set out in the statement will be carried out and how this will be evidenced from a community perspective

1.0.3 The strategy was published on the website <http://battleneighbourhoodplan.co.uk/information/communications-strategy> . The full communication and engagement strategy document can be viewed in **Appendix 1**.

02 Consultation timeline

2.0.1 The table below outlines the key points of community engagement and consultation which has shaped the production of the Battle CP NP.

For copies of engagement literature and resources used, refer to the **Battle CP NP Consultation Statement Appendix**. It is important to note that minutes of steering group meetings have been published throughout the process and key documents published including results from the call for sites process.

Date	Type	Details
2015		
20-02-2015	BTC action	BTC applied for Neighbourhood Area (from RDC)
14-04-2015	BTC action	BTC received Neighbourhood Area (from RDC)
22-07-2015	Steering Group formed	Steering group formed
01-08-2015	Press Release	Aug 2015 press release
13-11-2015	Newspaper article	Call For Sites advertised in Battle Observer
30-11-2015	Call For Sites submission deadline	Call For Sites replies due in by 30/11/2015
2016		
18-01-2016	Public survey	Survey to ascertain the wishes of parish residents. Sent to all residents by post
29-02-2016	Survey deadline	Deadline for evidence survey
01-07-2016	BTC publication	Article included in BTC quarterly newsletter - page 4
2017		
01-03-2017	BTC publication	Article included in BTC quarterly newsletter - page 8
01-06-2017	BTC publication	Article included in BTC quarterly newsletter - page 2 and 3
04-04-2017	Newspaper article	Maurice Holmes article - Advertising the upcoming event on 27/28/29 April
27-04-2017	Public event (presentation)	Initial Public Consultation. Progress of the NP was presented at the Battle Annual Parish Assembly evening of 27th
28-04-2017	Public event (consultation)	Initial Public Consultation. 28th and 29th April at Battle Memorial Hall
01-11-2017	Newspaper article	Maurice Holmes article - Volunteers and appointment of DM as consultant
2018		

Date	Type	Details
23-02-2018	New website	New website launched. Date uncertain
16-03-2018	Newspaper article	Paragraph in Maurice's regular Netherfield column
23-03-2018	Newspaper article	Observer update - Introduction, Website/press, Advert for parish assembly
24-04-2018	Public event (presentation)	Display boards at Parish Assembly
27-04-2018	Newspaper article	Observer update - "What buildings should be protected" / Heritage working party
25-05-2018	Newspaper article	Observer update - Character Appraisal, Geographical area, and travel
22-06-2018	Newspaper article	Observer update - LGS, SSSI
27-07-2018	Newspaper article	Observer update - LGS / historical / Reg14
24-08-2018	Newspaper article	Observer update - "Do you live in a heritage home?"
18-09-2018	Newspaper article	Observer update - AECOM / Traffic light system
26-10-2018	Newspaper article	Observer update - AECOM / SHLAA / NPPF
30-11-2018	Newspaper article	Observer update - Overview, progress, sites, AECOM
28-12-2018	Newspaper article	Observer update - AECOM, SHLAA, number of sites
2019		
25-01-2019	Newspaper article	Observer update - Progress / AECOM / Public Realm
22-02-2019	Newspaper article	Observer update - NPPF
01-03-2019	BTC publication	Article in BTC quarterly newsletter page 7
22-03-2019	Newspaper article	Observer update - Screening, SEAs, SAs
26-04-2019	Newspaper article	Observer update - Advertising of upcoming consultation
30-04-2019	Private event (presentation)	Presentation of the Neighbourhood Plan and it's progress to Battle Town Councillors
04-05-2019	Public event (consultation)	Presentation of potential preferred development sites, at Battle Memorial Hall. Over 150 attendees
10-05-2019	Newspaper article	Observer update - Report on the public consultation May 4th
12-05-2019	Social media	Creation of facebook page https://www.facebook.com/BattleNeighbourhoodPlan
13-05-2019	Newspaper article	Observer update - A news article published in Battle & Rye Observer
10-05-2019	Newspaper article	Richard Gladstone's Observer report on May 4th presentation

Date	Type	Details
21-05-2019	Private event (presentation)	Presentation to newly elected Battle Town Councillors
24-05-2019	Newspaper article	Observer update - Public consultation on sites under consideration
01-06-2019	Newspaper article	Article in Battle Town Council's June town magazine
28-06-2019	Newspaper article	Observer update - AECOM and design codes
26-07-2019	Newspaper article	Observer update - CIL calculations / skate ramp
23-08-2019	Newspaper article	Observer update - Mentions John Howell meeting, and progress of other parishes
27-09-2019	Newspaper article	Observer update - History of steering group members
25-10-2019	Newspaper article	Observer update - Explanation of Reg14, RDC, planning inspector. Mentions young persons survey
22-11-2019	Newspaper article	Observer update - Green gaps, youth survey, Regulation 14
01-12-2019	BTC publication	Article in BTC quarterly newsletter page 8
2020		
03-01-2020	Newspaper article	Observer update - Assets of community value
24-01-2020	Newspaper article	Observer update - Reg14 consultation now on
22-02-2020	Flyer for Netherfield distribution	Following up from Maurice's meeting on 20/02/2020, the NP's information sheet to correct some inaccuracy and mis-information
28-02-2020	Newspaper article	Observer update - Feedback required, Community Aspirations, CIL
27-03-2020	Newspaper article	Observer update – Thank you to respondents, analysing information, Covid-19
24-04-2020	Newspaper article	Observer update - Meetings, analysis, misconceptions
22-05-2020	Newspaper article	Observer update
05-06-2020	Newspaper letter	Observer letter from chair of steering group regarding Call for Employment/Retails Sites
05-06-2020	Electronic communication	Call for employment / retail sites. Also on Rother Alerts, BTC Twitter feed, and BCPNP Facebook page
12-06-2020	Newspaper article	BTC article in Observer newspaper "Call for Employment/Retail sites"
26-06-2020	Newspaper article	Observer update

03 Regulation 14 consultation responses

- 3.0.1 The Neighbourhood Planning Regulations at Regulation 14 requires that the Pre-Submission Plan is taken to public consultation by the Town Council. This is a formal statutory consultation period of 6 weeks with the statutory bodies, stakeholders, the Local Planning Authority and the community. It then requires the Town Council to consider those representations received and whether any further changes may be required because of these. The Reg.14 Pre-submission consultation and publicity was from 20th January to 5pm 1st March 2020. In addition to being emailed to the relevant people, the plan was made available on <http://battleneighbourhoodplan.co.uk/reg14> or alternatively, paper forms and printed copies of maps and some documents were available at Battle Library, Netherfield Village Shop, Blackhorse Public House, Battle Memorial Hall and The Almonry. Whilst responders were encouraged to use the response forms to provide us with feedback, we welcomed feedback/comments in any written format. Should responders prefer to comment via letter then post or drop to Battle Town Council, The Almonry, High Street, Battle, TN33 0EQ, or email at enquiries@battleneighbourhoodplan.co.uk was made available.
- 3.0.2 The tables below outline the key points of representations made at Regulation 14 community engagement and consultation which has shaped the changes to the Battle CP NP at Regulation 14 stage.

Introduction

These sites will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15:

- Cherry Gardens (BANS117)
- Marley Lane (BANS103)
- Land to the north-east of Cedarwood Care Home (BANS118) – This site is colloquially also known as Loose Farm and this has been used by many respondents.

With regard to the remaining listed sites, it was agreed to remove any prioritisation and for dwelling numbers assumed per site they are indicated as “up to”, rather than providing a specify number.

Handwritten responses have been transcribed into the table below and although every effort has been made to replicate these accurately there may be a few typographical errors.

The summary column includes the full text of what was written by responders when the responses were short or difficult to precis. Key issues were extracted from longer responses using where possible original text including, on occasion, typographical errors

Structure

The responses received have been gathered together as 4 sections:

- **Statutory Body responses**
- **Individual responses**
- **Developers / Site owners** responses, where:
 - col 1 = id number
 - col 2 = "Area of feedback"
 - col 3 = summary of responder's feedback
 - col 4 = SG comment on feedback
- **Netherfield "local questionnaire" responses, where:**
 - col 1 = not used
 - col 2 = "Question number"
 - col 3 = Pro-forma text written and supplied to residents by Maurice Holmes, who is a Netherfield resident
 - col 4 = summary of pro-forma text
 - col 5 = SG comments

NOTE: Text deletions have a strike through the wording that has been removed and text re-wording/new wording is shown in red for clarity.

Statutory Body Responses

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
O-3JX-01	EnvAg	Recommend an objective is included to protect and enhance the environment. Indicators should relate to the environmental constraints in your local area. This may include flood risk, water quality, biodiversity	Whilst it is good practice to have objectives at the start of the engagement process with the community, there is no requirement to have objectives. Whilst there is not a particular objective entitled protect and enhance the environment, the Plan addresses this very subject in all of the Environment policies and explicitly in Policy EN3: Conservation of the environment, ecosystems and

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
			<p>biodiversity and Policy EN2: Natural environment. For completeness objective 5 has been amended as follows: <i>OBJECTIVE 5: The Protection and enhancement of the environment and 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.</i></p> <p>To protect and enhance our existing and future open spaces, proposal should conserve and enhance the environment, ecosystem and biodiversity, ensuring that new development gives protection to habitats and provides appropriate movement corridors for wildlife.</p>
		<p>Recommend your SEA takes account of relevant Dover Borough Council's policies, plans and strategies including DBC's Strategic Flood Risk Assessment, flood risk strategies (https://www.gov.uk/government/collections/flood-risk-managementcurrent-schemes-and-strategies), and the South East River Basin Management Plan (https://www.gov.uk/government/publications/south-east-river-basin-management-plan).</p>	<p>Noted, SEA amended to make reference of DBC's Strategic Flood Risk Assessment, flood risk strategies and the South East River Basin Management Plan.</p>
O-7PR-01	HwAONB	<p>Recommendation 1 : some policies to be tightened due to policy wording being imprecise and capable of being misapplied by applicants.</p>	<p>The policies have been amended and strengthened to respond to comments made at the Reg.14 consultation.</p>
		<p>Recommendation 2 suggestion to tighten up wording of policy HD2</p>	<p>This policy has been amended and strengthened to respond to comments made at Reg.14 consultation.</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		Recommendation 3 and 4 : Concerns on the order of priority, and total number of dwellings to be allocated.	Recommendation 3 and 4 - Agreed to remove order of priority, and total number of dwellings to be allocated: See response from RDC and other respondents. No reserve dwellings in Battle & Telham, but a reserve has been retained in Netherfield, due to uncertainty of the extent of Gypsum undermining.
		Recommendation 5: High weald unit concerns about Cherry Gardens and its inclusion in the plan and recommend that this site is deleted from the list of proposed allocations.	The Cherry Gardens site (BANS117) will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15
		Recommendation 6: Concerns on development near White House Farm	All planning applications should comply with the Battle CP Design Guidelines and High Weald Housing Design Guide. Further work is being undertaken.
		Recommendation 7: Concerns on landscaping in policy HD5	Agree with recommendation to include HWAONB High Weald Housing Design Guide and Battle CP Design Guidelines in policy HD5 key evidence base reference
		Recommendation 8: Policy EN2 to be strengthened to require biodiversity gain from developments in line with the NPPF and emerging legislation.	Agreed. Policy amended to reflect this.
		Recommendation 9 : Concern for lack of reference to the AONB Management Plan	Agreed. Policy amended in line with HWAONB management plan.
O-8JN-01	National Trust	Support for the overall plan. No specific issues of concern raised.	No further action required.
O-5AH-01	SEastWtr	South East Water suggest to include the "SA Objective: Maintain, improve and manage water resources in a sustainable way" found in the Rother Sustainability Appraisal Framework for Development and Site Allocation Plan as part of the Battle Civil Parish Neighbourhood Plan Strategic Environmental Assessment's objectives.	Noted. The SEA addresses this objective
		South East Water recommend the need of a mandatory housing standards for water use which would support water efficiency on new buildings and promote the collaboration between Battle Town Council and developers. All dwellings should need to meet a requirement of 110 l/p/d. We advise that the Town Council should	Water efficiency standards and Reference to South East Water to be added to the Community Aspiration section. https://corporate.southeastwater.co.uk/about-us/our-plans/water-resources-management-plan-2019/

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		include a policy that all residential and non-residential development shall meet the water efficiency standard of 110 litres/person/day (preferably lower).	https://corporate.southeastwater.co.uk/media/2901/sew_five_year_business_plan_2020-2025.pdf
		South East Water would like to be kept updated with any developments relating to Battle Civil Parish Neighbourhood Plan	Noted
O-6JQ-01	British Gypsum	<p>White house poultry farm potential development site is in part overlapping old British Gypsum mine workings. There is a potential subsidence issue</p> <p>Swallow Barn potential development site is not within the old British Gypsum mine workings. There is no potential subsidence issue</p>	<p>In the light of planning history to the west of Darvell Down where mine workings are mapped, local developers were prepared to submit planning applications with detailed mining reports. Therefore we do not expect or see NENS102 to be excluded from the plan.</p> <p>May be useful : http://planweb01.rother.gov.uk/OcellaWeb/viewDocument?file=dv_pl_files%5CRR_2017_1146_P%5CTCPS+656B+Gypsum+Mines+Assessment+Report++Appendices+April+2017.pdf&module=pl</p> <p>We have received more detailed mapping of possible undermining of NE06 and this will have limited impact on the site capacity.</p> <p>No action required</p>
O-3JX-02	RDC	<p>1a. Initial reaction is good</p> <p>1b (para 1). Some text and policies need updating</p> <p>1b (para 2). Noting that NPPF and PPG require concise policies</p> <p>1c. Employment and Retail policies need attention</p>	<p>1a. Noted</p> <p>1b (para 1). Noted</p> <p>1b (para 2). Noted</p> <p>1c. Noted and as a result a specific call for Retail and Employment sites was held with a closing date of 30th June</p>
		Pg5 Para1.3.1 Amended wording	Pg5 Para1.3.1 Agreed

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		Page 5 – para 1.3.1 Suggest that it should read The National Planning Policy Framework (NPPF 2019) outlines what a Neighbourhood Plan can do.	
		<p>Page 6 – para 1.3.5 line 6 Suggest that BCPNPs be replaced by Neighbourhood Plans</p> <p>Page 6 – para 1.3.6 line 4 Suggest that EBCPNP be replaced by BCPNP</p> <p>Page 6 – para 1.3.7 lines 3,4. 5, 6 The DaSA has now been adopted so the final sentence should be deleted and replaced as follows : The DaSA Local Plan was adopted by Rother District Full Council on 16 December 2019, having been found sound by the Inspector appointed to oversee the public examination process, subject to the inclusion of the Main Modifications and changes to Policies Maps as set out in the Appendix to his report.</p>	<p>Pg6 Para1.3.5 - Agreed</p> <p>Pg6 Para1.3.6 - Agreed</p> <p>Pg6 Para1.3.7 - Agreed</p>
		<p>BCPNP SECTION 2 : Process Summary</p> <p>Page 15 – para 3.5.2 line 6 Suggest that 'rural conurbation' be amended to 'rural settlement'</p> <p>Page 18 – para 3.5.10 Suggest that the paragraph be replaced with the following wording ; 'The Battle Conservation Area relates to the town centre, Battle Abbey and the historic battlefield '</p> <p>Page 19 – para 3.6.1 line 1Suggest additional wording as follows : 'Battle Conservation Area was designated in June 1971 by East Sussex County Council and amendments to the boundary were adopted by Rother District Council in 2006 following a Conservation</p>	<p>P15 Para3.5.2 - Agreed</p> <p>P18 Para3.5.10 - Agreed</p> <p>Pg19 Para3.6.1 - Agreed</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		Area Appraisal ' (2006 Boundary Designation shown on map - Figure 9 Historic Environment)	
		<p>Pg25 Para3.10 Query on SWOT analysis</p> <p>In WEAKNESSES not clear what is meant by Planning permissions granted in AONB means as the whole Parish is within the High Weald AONB</p> <p>In THREATS not clear as to what point 1 The imposition of development programmes actually refers to and means</p>	<p>Pg25 Para3.10 - Amend 4th bullet point WEAKNESS with "Types of Planning permissions granted within the High Weald AONB". (Agreed SG and DM)</p> <p>Amend first bullet point under THREATS with <i>The provision of housing development within the Civil Parish, which might not reflect the housing needs of the community.</i></p>
		<p>Pg27 Obj1 Retitle</p> <p>Pg27 Obj2 Retitle and reword</p> <p>Pg27 Obj3 Suggested re-wording</p> <p>Pg27 Obj5 Retitle</p> <p>Pg27 Obj6 Retitle</p>	<p>Pg27 Obj1 – Agreed - retitled Additional Residential Development Sites</p> <p>Pg27 Obj2 – Agreed - retitled Traffic Mitigation Measures</p> <p>Pg27 Obj3 - Agreed - Amend objective 3 as follows: <i>To formulate a policy that not only recognises the separate identities of the village of Netherfield and the hamlet of Telham and their unique relationship to Battle Town established over centuries, but enables them to retain the landscape characteristics of the High Weald AONB and prevent urban sprawl through creative solutions within the overall strategic aims of the Core Strategy</i></p> <p>Pg27 Obj5 - Agreed - <i>The Protection of Open Spaces and the Countryside</i></p> <p>Pg27 Obj6 – Agreed – retitle to Protection of Heritage Assets within the Parish Settlements</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		Pg28 Obj8 Amend wording	Pg28 Obj8 – Agreed - rewording lines 3 & 4 '....which shall be used to pump prime the required funds needed for those facilities. An example of this objective
		<p>P29 Ln3 Remove notes</p> <p>Pg29 HD1 Retitle</p> <p>HD1 Para1 Rewording</p> <p>HD1 Para2 Supporting text</p>	<p>P29 Ln3 – Agreed</p> <p>Pg29 HD1 -Agreed – retitle to - Policy HD1 Development Boundaries</p> <p>HD1 Para1 - Agreed - Policy HD1 amended as suggested by RDC.</p> <p><i>Policy HD1:Development Boundaries</i></p> <p><i>The Plan designates Development Boundaries for Battle and Netherfield as shown on Maps 1 and 2 in APPENDIX C of the BCPNP. All new housing developments should take place within the defined Development Boundaries. The entire Parish of Battle is located within the High Weald AONB where all development should conserve and enhance the natural beauty of the AONB. Any development outside the Development Boundaries will be regarded as lying within the countryside to which RDC Core Strategy Policies OSS2, RA2, RA3 and EN1 relate. Development will only be permitted in the AONB countryside where it complies with RDC Core Strategy policies and relevant policies in the BCPNP</i></p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
			<p>HD1 Para 2 - Supporting text to be expanded accordingly</p> <p>the explanatory text to the policy should expand details of the RDC Core Strategy Policies OSS2 Use of Development Boundaries, RA2 General Strategy for the Countryside, RA3 Development in the Countryside and EN1 Landscape Stewardship. Similarly reference to the High Weald AONB Management Plan 2019 -2024 should be made and the requirement that all development should conserve and enhance the natural beauty of the AONB should be emphasised...</p>
		Pg29 Ln1 Rewording	Pg29 Ln1 – Agreed - embodied in the High Weald Housing Design Guide.
		P30 HD2 Rewording required	<p>P30 HD2 - Amend Policy HD2 Agreed to remove priority order.</p> <p>Amend the policy as follows: <i>...supports this requirement and seeks to allocate the following sites for residential development in the following priority order:</i></p> <p>Netherfield</p> <ul style="list-style-type: none"> •NE NS102 (part of NE06) White House Poultry Farm: <i>up to 23 dwelling</i> •NE05a and NE05r Swallow Barn off B2096: <i>up to 10 dwellings.</i> <p>Reinstate •NE05a and NE05r</p> <p>Medieval field patterns and Gypsum would be a material consideration</p> <p>Battle and Telham</p> <ul style="list-style-type: none"> •BA31a Glengorse: <i>15- up to 20 dwellings</i>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
			<ul style="list-style-type: none"> •BA36 Land at Caldbec House, Caldbec Hill: up to 9 dwellings •BA11 Blackfriars: up to 220 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
		P30 HD2 Rewording required	Site allocations
		BANS117 comments on Cherry Gardens	BANS117 - Delete Cherry Gardens allocation and others so that the Plan does not 'over allocate' The Cherry Gardens site (BANS117) will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15.
		BA31a comments on Glengorse	BA31a - Amend allocation for Glengorse to up to 20 dwellings
		BA36 comments on Caldbec Hill	BA36 - Amend allocation for Land at Caldbec up to 9 dwellings
		BANS118 comments on Land to NE of Cedarwood Care Home	Site BANS118 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15
		BANS103 comments on Land east of Battle Great Wood	Site BANS103 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15
		HD2 Rewording	HD2 Rewording - Agreed

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		<p>Netherfield comments</p> <p>BA31a Glengorse</p> <p>BA36 Caldbec Hill</p> <p>BA11 Blackfriars. Suggested changes</p>	<p>Netherfield: See amendments to the allocation as per earlier comments from RDC</p> <p>BA31a - (this seems to contradict RDC advice above, which indicates 15) See amendments to the allocation as per earlier comments from RDC</p> <p>BA36 - (this seems to contradict RDC advice above, which indicates 15) See amendments to the allocation as per earlier comments from RDC</p> <p>BA11 - Amend the 2nd part of the Policy HD2 as follows:</p> <ol style="list-style-type: none"> 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 appropriate landscaping and accessible green space within the site; 3.the provision of appropriate vehicular and pedestrian access into the site and where appropriate links to the footpath and cycle network; and 4.Where appropriate 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.
		<p>Pg31 Amend wording of Obj1, line 2 onwards</p> <p>Pg31 'Reword' references to RDC Core Strategy policy for Battle = Policy BA1 –Policy Framework for Battle OSS1 Overall Spatial Development Strategy and RA1 Villages</p>	<p>Pg31 - Agreed</p> <p>New text: “The aim is for development sites within the defined Development Boundaries to reflect not only the AONB character of in the locality but to embody the design principles embodied in the Battle CP Design Guidelines and the High Weald Housing Design Guide”</p> <p>Amendment agreed, but Battle CP Design Guidelines</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
			<p>must be included in a policy statement with a copy of the document in the Appendix. The High Weald Housing Design Guide has been adopted by RDC and will be a material consideration when assessing planning applications. The Battle CP Design Guidelines can gain the same status by tightening its position in the NP by making it more than a reference.</p> <p>P31 'Reword' - Agreed</p>
		<p>5.1.2 Insert words Para 1 Suggestion made to change wording to "It is suggested that this paragraph be rewritten to confirm that that only definite allocated sites be part of the BCPNP. The contingency sites should be either be allocated or deleted. In Neighbourhood Planning it is possible to equal or exceed the Core Strategy figure. The use of contingency sites is not recommended. "</p>	<p>5.1.2 Agree with inserted words Para1 rewriting - Amend Para 5.1.2 Confirmed as below. <i>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 Local Plan.</i></p> <p>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 ...</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		<p>Para 2 -Suggested rewording : 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 be made when the Neighbourhood Plan is reviewed in conjunction with the impending RDC Local Plan Update</p> <p>Pg32- Policy HD3 Housing Mix This policy needs to take account of Core Strategy Policy LHN1 Achieving Mixed and Balanced Communities and DaSA Policy DHG1 Affordable Housing. The policy implies that it only applies to Battle and not Netherfield. Wording needs to be revised</p>	Para 2 and Pg32 - Agreed
		<p>Para 5.1.3 Policy Intent This paragraph needs revisiting and further revisions as to what are defined as starter homes is currently under discussion by the new Government . Check for the current definition of Affordable housing</p>	Para 5.1.3 - Amend the definition of affordable housing to the latest government definition.
		<p>Pg33 HD4 Proposal to reword policy HD4: Quality of Design- The approach taken is understood. However the policy needs some amendment and rewording to become workable as a planning policy. The policy should apply to new build homes and other buildings and alterations to existing properties that require planning permission or listed building consent. It should not preclude skillful innovative design in contemporary architecture subject to context. If Policy HD4 is to use the AECOM Design Guidelines for decision making then that document should be formally included in the BCPNP so that it can be tested at Examination and form part of the 'made' NP if a successful referendum vote is achieved</p>	<p>Pg33 HD4 - This section of the Plan is Housing and Development not just Housing so this is the best area for the Design policy.</p> <p>Amend the policy as follows: <i>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 which propose sympathetic</i></p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
			<p><i>designs that reflect the connections between people and places with regard to the</i> 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 supported refused. Skillful innovative design will be supported where it is appropriately proposed. Applications must give priority to the use of local vernacular building materials. The Battle Character Appraisal (see evidence base) and Design Guide Battle CP Design Guidelines (see Appendix) and the High Weald Housing Design Guide document will be used as a reference to assess the impact of the proposals.</p>
		5.1.4 Policy intent - This section should be redrafted to give clear advice to applicants, professionals, developers and the public as to the design requirements and decision making criteria of the policy. Does this only apply to residential developments or is the intention that it apply more widely?	<p>5.1.4 - Amend as follows:</p> <p>Policy Intent : <i>The policy applies to all development - new build homes ,commercial property and other buildings and alterations to existing properties that require planning permission or listed building consent. This attention to detail ...</i></p>
		<p>Pg34 HD5</p> <p>Integration and protection of landscaping</p> <p>The policy seems to be mixing up two different objectives. Landscaping schemes for new residential development and protection of the landscape within specified green gaps within the High Weald AONB.</p>	<p>Pg34 HD5 - Amend the policy as follows:</p> <p><i>Landscaping schemes should seek to retain natural and semi- natural habitats. The long-term management of soft landscape features should be secured.</i></p>
		Policy HD6 Local Connection -	The policy meets the basic conditions

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		There are various issues relating to affordable housing and the criteria for selecting occupiers and tenants which are not applied via the planning process. The requirements outlined in this policy need to be double checked as to their legality in terms of a planning policy. For the reasons outlined above this policy is not considered exercisable via the planning system and should be removed	
		<p>Pg35 Para5.1.6 Questionable policy intent</p> <p>"Para 5.1.6 Policy intent Para 74 of the NPPF 2019 relates to a 5 year housing supply and it is not clear how this relates to the wording of this Policy Intent paragraph"</p>	<p>Pg35 Para5.1.6 - This paragraph references the NPPG not NPPF so it is correct.</p> <p>For completeness this is what is meant by 'general conformity'?</p> <p>When considering whether a policy is in general conformity a qualifying body, independent examiner, or local planning authority, should consider the following:</p> <ul style="list-style-type: none"> • whether the neighbourhood plan policy or development proposal supports and upholds the general principle that the strategic policy is concerned with • the degree, if any, of conflict between the draft neighbourhood plan policy or development proposal and the strategic policy • whether the draft neighbourhood plan policy or development proposal provides an additional level of detail and/or a distinct local approach to that set out in the strategic policy without undermining that policy • the rationale for the approach taken in the draft neighbourhood plan or Order and the evidence to justify that approach <p>Paragraph: 074 Reference ID: 41-074-20140306</p> <p>Revision date: 06 03 2014</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
			No change needed
		<p>Policy HD7: Integration of New Housing</p> <p>It is difficult to ascertain how this policy can be meaningfully applied in the decision making process. The wording is vague and needs rethinking. It might be better if the objectives of the policy are appropriately redrafted and included as part of the requirements of Policy HD5</p>	<p>HD7 - Policy HD5 is about integrating and protecting landscaping whereas HD7 is about integrating new housing so the two cannot be combined.</p> <p>Proposed amendments for the policy are as follows:</p> <p><i>Policy HD7: Integration of New Housing</i></p> <p><i>Proposals for new housing must ensure that the new homes are well connected to the surrounding area and visually integrated with their surroundings and well connected to the community and its shops and facilities. 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.</i></p>
		<p>P36 Policy HD8: Suggest introduction should read ' The Plan designates the following four areas :</p> <p>a) GG01 Battle north, east of A2100</p> <p>b) GG02 Battle north-east, Whatlington Road</p> <p>c) GG03 Battle east, Marley Lane</p> <p>d)GG04 Telham, A2100 and Telham Lane</p> <p>as shown on MAP 4 in APPENDIX C as Green Gaps within the High Weald AONB.....</p>	<p>Pg36 HD8 – Agreed but this is found in Appendix D</p>
		<p>MAP 4 should also be enlarged and contain the relevant GG site references so that the full extent of the four areas of land designated as Green Gaps are clearly defined for applicants, professionals,</p>	<p>Map4 - Agreed . Appropriate edits to the maps are described in Reg14 consultation maps review.</p> <p>The local green spaces analysis is being edited.</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		developers and the public in relation to the implementation of the policy	
		Para 5.1.8 Policy intent line 1 & 2 suggest rewording as follows Although the land outside the settlement boundaries is already designated as High Weald AONB which offers policy protection from development	Para5.1.8 - Agreed
		Pg37 IN1 Not applicable everywhere - Traffic impact assessments cannot be required for all development	Pg37 IN1 - Amend the policy as follows: Policy IN1: Traffic mitigation <i>Applications for all new major development must provide a traffic impact ...</i> Confirmed amendment After checking with ESCC, the correct terminology is Transport Assessment.
		Policy IN2 : Maintain and improve existing infrastructure The requirements of this planning policy are vague particularly as many elements of works relating to utilities and highways are permitted development. It may be better if this policy is placed in the Aspirations List where discussions can take place with the appropriate agencies concerning highways, telecommunications, utilities etc..	IN2 – Policy to be retained This policy seeks to ensure that the necessary infrastructure is provided and a locally distinctive approach to development and the impact of development which forms the core of Neighbourhood Planning as set out on Part 6, Chapter 3 and Schedule 9 of the Localism Act 2011
		Pg38 IN3 - Policy IN3 Parking and new development. The car parking standards for development proposals in East Sussex are administered by ESCC Highways, The standards are contained within the following documents Guidance for Parking at New Residential Development –	P38 IN3 - Amend as follows: Policy IN3: Parking and new development <i>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 appropriate level of off street parking</i>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		Transport Development Control 2017, Guidance for Parking at Non-Residential Development and the Car Parking Demand Calculator	<p>consistent with the current local East Sussex County Council standards. Developments that reduce the amount of off-street parking currently available will only be supported if where 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.</p> <p>Please insert in IN3 "Conformity list of references" the ESCC policy concerning parking standards.</p>
		Para5.2.3 It is recommended that the suggestions put forward in this section be discussed with ESCC Highways in order to elicit their views and support	Para5.2.3 - The proposed amendment above is in keeping with the ESCC comments
		P39 EN1 Local Green Space Designations. Suggest minor rewording	P39 EN1 - No change needed
		<p>Site GS12 George Meadow and Upper Stumbleetts will need to be fully mapped if it is to be taken forward</p> <p>Pg40 EN2 RDC Core Strategy and DaSA references to be used</p> <p>P40 points a-f : Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services –</p>	<p>No change needed. GS12 is fully mapped and Upper Stumbleetts has been mapped based on the best evidence available from the land registry.</p> <p>Pg40 EN2 - Agreed</p> <p>Pg40 points a-f - Agreed</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		<p>including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;</p> <p>c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;</p> <p>d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;</p> <p>e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and</p> <p>f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.</p>	
		It is suggested that Policy EN2 be combined with EN3 and be retitled and reworded to take account of the 2019 NPPF policy requirements	<p>Merge EN2&EN3 – Agreed</p> <p>THIS BECOMES Policy EN2: Conservation of the natural environment, ecosystems and biodiversity</p>
		<p>EN4 suggested new title “The High Weald AONB and Countryside Protection” and also suggests the strengthening of the text, emphasising the importance of the AONB Management Plan.</p> <p>RDC suggest deleting the following from the Policy Proposals which preserve and enhance the open character of the important gaps between settlements and which are not detrimental to the Green Infrastructure Network ... will be supported.” This wording seems to imply support for development in the countryside,</p>	<p>EN4 – Agreed</p> <p>THIS BECOMES Policy EN3: The High Weald AONB and Countryside Protection</p>

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		which is probably not what is meant. Also it is not clear what is meant by the Green Infrastructure Network (as identified by the Local Planning Authority).	
		<p>Pg42 Policy EN5 Historic Environment - Alternative wording suggested : "Heritage assets in the Parish and their settings, including designated heritages such as listed buildings, Battle Conservation Area, the designated Battlefield, and Scheduled Ancient Monuments, along with undesignated local heritage assets, historic public realm, sites of archaeological significance, and sensitive ecology and landscape designations 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"</p> <p>EN5&6 It is surprising that there is no reference in either of these policies and supporting text to the adopted Battle Conservation Area Appraisal 2006. This should be included. Amend BCPNP objectives to Protection of Heritage Assets within the Parish Settlements</p> <p>Pg42 EN5 Historic Environment- Suggest rewording of the final two paragraphs of the policy as it appears that harm and loss are being considered acceptable as part of the determining of planning applications. The merits of every</p>	<p>Pg42 EN5 - Agreed to the amended text and delete the final sentence</p> <p>Heritage assets in the Parish and their settings, including designated heritages such as listed buildings, Battle Conservation Area, the designated Battlefield, and Scheduled Ancient Monuments, along with undesignated local heritage assets, historic public realm, sites of archaeological significance, and sensitive ecology and landscape designations 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</p> <p>Applicants should clearly demonstrate that any harm is both unavoidable and justified on the basis of the public benefits it delivers.</p> <p>EN5&6 – Agreed</p> <p>Pg42 EN5 - See above.</p> <p>THIS BECOMES POLICY EN4</p>

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		application have to be weighed but the wording does not appear to be achieving the objectives of the policy	
		<p>Pg43 EN6</p> <p>Locally important historic buildings, other structures and other undesignated heritage assets</p> <p>Refers to a "local heritage listing of buildings from Battle Town Council submitted to the Local Planning Authority" – has this been submitted to RDC? RDC do not seem to have a record of this.</p>	<p>amend as below</p> <p>Local heritage listing of buildings are to be considered by Battle Town Council in April and then submitted to RDC. Amend last sentence to read: The local heritage list from Battle Town Council will be submitted to the Local Planning Authority and used to assess the impact of affected proposals.</p> <p>THIS BECOMES POLICY EN5</p>
		<p>Para 5.3.6: RDC have requested a change of wording from "Rother District Council has not formally identified any dwellings or other heritage assets which are non-designated"</p> <p>to "Rother District Council do not currently maintain any Local Lists within the district, but identify non-designated heritage assets during the planning processes, in both the development management process and the site allocation process."</p>	Para 5.3.6: - Agreed
		The Environment section doesn't refer specifically to the quality of the public realm (apart from a brief reference to the historic public realm amongst other heritage assets in EN5) – in view of the recent Rother Public Realm Strategic Framework, there is an opportunity here to highlight the importance of the public realm in Battle.	Agreed to include more references to quality of the public realm using the recent Rother Public Realm Strategic Framework.
		<p>Pg44 Para5.4 Economy & Tourism</p> <p>RDC is highlighting a requirement for Battle for employment and retail sites based on the 2011 Battle Town Study data.</p>	<p>Pg44 Para5.4 - RDC Policy BA1 will be reference in the supporting text for Policy ET2.</p> <p>The plan has to be in general conformity with the strategic policies of the RDC plan and as such policies ET1 and ET2 is in general conformity with RDC policy BA1. There was a call for sites for employment and retail after the reg.14 consultation to address any gap or need for this type of allocation. RDC Policy BA1 already</p>

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		<p>Pg44 ET1: Tourism and Local Economy - Suggest minor rewording: "1 it will help sustain the local economy and help assist local businesses to remain viable; 3 it minimises the impact of the proposal on the wider character of the High Weald AONB landscape RDC policy Add CS Policies BA1 (iv) (v) & (vi); RA2: EC6; EC7 and DaSA Policies DEC3"</p>	<p>allocates the employment site. This will be further strengthen by the following amendment as follows: Policy ET2: Sustaining local retail and encouraging employment opportunities</p> <p>Existing local retail space and diverse retail offers will be supported to provide a sustainable opportunity for local residents and tourists alike. Local employment opportunities will be supported and encouraged to enhance the historic former market town. This policy will be implemented in accordance with RDC Policy BA1, which was approved in 2014 (based on the Battle Town Study 2011), and will be applied to reflect the changing retail marketplace, including the significant increase in online shopping. Both retail and employment opportunities will be strongly supported if they: 1. Minimise the visual and environmental impact, by sensitive siting and design and 2. Retain or improve the positive characteristics of the area.</p> <p>Pg44 ET1 - Agreed</p>
		<p>Policy ET2: Encouraging employment Redrafting suggested as intentions are not clear in item 2. Item 2 the impact of the proposal minimises the wider character of the area?</p>	<p>Policy ET2: Sustaining local retail and encouraging employment opportunities</p>

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			<p>Existing local retail space and diverse retail offers will be supported to provide a sustainable opportunity for local residents and tourists alike.</p> <p>Local employment opportunities will be supported and encouraged to enhance the historic former market town.</p> <p>This policy will be implemented in accordance with RDC Policy BA1, which was approved in 2014 (based on the Battle Town Study 2011), and will be applied to reflect the changing retail marketplace, including the significant increase in online shopping.</p> <p>Both retail and employment opportunities will be strongly supported if they:</p> <ol style="list-style-type: none"> 1. Minimise the visual and environmental impact, by sensitive siting and design and 2. Retain or improve the positive characteristics of the area.
		<p>Pg45 ET3 Developer Contributions -</p> <p>RDC state that "The wording of this policy and its intentions need to be rethought. CIL will be collected on new eligible residential development and 25% of monies collected will be forwarded to BTC if the Neighbourhood Plan is made. (15% if the NP is not made)"</p> <p>RDC also states that "The Policy might be better placed in the aspirations section of the plan where a list of projects and objectives could be identified and advanced for funding by CIL monies or negotiation via S106 Obligations. It is noted that a Health Centre within Netherfield is an objective"</p>	<p>Pg45 ET3 - Developer Contributions -</p> <p>The steering group understands that CIL contributions are made according to Government guidelines and collected by the District Council. It is our view that the Community Aspirations in section 7 outline many potential projects (e.g. Netherfield health centre) requiring funding from the CIL income.</p> <p>However, NDPs can include policies on developer contributions so this policy does not have to be placed in aspirations. The similar policy was written by our</p>

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			consultant for the Robertsbridge Plan which is now a 'made' plan.
		<p>Policy ET4 Protection of Assets of Community Value</p> <p>This Policy should be placed in the Community Aspirations section of the Neighbourhood Plan. The procedures for registering Assets of Community Value are not via the planning system and the process is shown in the diagram below.</p> <p>(refer to diagram in original PDF from RDC)</p>	<p>ET4 (ACVs) - No change needed</p> <p>The policy is intended to provide protection to the assets which meet the Local Authority's criteria. It does not purport to apply for any ACVs and makes it clear that the Town Council will still need to apply to RDC for sites to become an ACV. The similar policy was written by our consultant for the Robertsbridge Plan which is now a 'made' plan.</p>
		<p>Pg47 Policy ET5 Community leisure and cultural facilities -</p> <p>RDC suggests that the wording is not clear as to the workings and objectives of the policy. The wording of Policy CF1 Community and Recreational Facilities which was accepted by the Examiner and is in a made Neighbourhood Plan within the Rother district and could be a useful guide to wording which is likely to achieve the intentions of the policy.</p>	<p>Pg47 ET5 – Agreed to the ideas proposed here, but we think the existing community facilities should be listed in a separate appendix because the policy deals with existing and future so it would be too confusing otherwise. The Community Aspirations highlights additional leisure and cultural facilities. The similar policy was written by our consultant for the Robertsbridge Plan which is now a 'made' plan.</p> <p>An additional sentence added to address comments from RDC.</p> <p>The continued investment in the community facilities of the village which will include the use of CIL receipts to upgrade and maintain these where appropriate to meet the identified needs of the community will be supported.</p>
		SEA Pg25 (Table3)	SEA Pg25 (Table3) - Table 3 assesses each of the sites which have been brought forward as part of the AECOM site assessment process, individually against the aspects

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		In the opinion of RDC the analysis and scoring on certain sites does not appear to reflect all issues which appertain to sites: BA31a, BA36, BANS117 and BANS118	<p>of the SEA framework. The site assessment is as objective as possible with a typical RAG (red, amber, green) rating with commentary in the appropriate boxes to provide clarity where necessary. This section should be read in conjunction with the AECOM site assessment.</p> <p>There will always be differing views because this is an objective exercise which has been done based on information from the AECOM site assessment.</p> <p>For BA31a – We agree with Rother’s assessment for green on both category 10 and 12</p> <p>For BA36 – We agree with Rother that there is no flood risk on this site and this should be coloured green for category 12</p> <p>For BANS117 – We agree with RDC assessment that category 14 and 15 should be both red</p> <p>Site BANS118 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15. We suggest that an amber score for category 10.</p> <p>For categories 14 and 15, we agree with the red.</p>
		Pg27 (Table4) Summary of the sites - RDC state “Would have thought that site BA31a would be scored green. Would have thought that BA36 would be scored green. Would have thought that BA NS117 would be scored red. Would have thought that BANS118 would be scored red”	Pg27 (Table4) Summary of the sites - We agree with Rother allocation of green. Please note this is a reduced site with up to 20 dwellings and not 75 dwellings with BA23 (SHLAA site) which has been discounted and not included in the plan. It is also a reduction of BA31 which had an allocation of 35 and now has been reduced to up to 20 dwelling on BA31a.

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			<p>BA36 – Please revise scoring to green, in agreement with RDC in line with changes to category changes in table 3.</p> <p>BANS117 – We agree with RDC assessment, a red score is appropriate because of changes in scoring in table 3</p> <p>BANS118 - We agree with RDC assessment, a read score is appropriate because of changes in scoring in table 3</p>
O-4LZ-01	HwysEng	<p>No Neighbourhood Plan issues identified by Highways England.</p> <p>Concerns at planning permission stage will require transport assessments.</p>	No additional action required in the Neighbourhood Plan
O-1UE-01	ESCC	<p>1.1 – Concerns on congestion, the lack of bus services, road safety and parking</p> <p>Objective 2 - 1.2 – Concerns about traffic mitigation</p> <p>Objective 2 - 1.3 – Question on correct terminology</p> <p>Objective 9 - 1.4 - Emphasis should be on both sustainable travel and capacity/safety improvements</p>	<p>Section 1.1 - Statement of fact . Concerns are addressed in Community Aspirations</p> <p>Objective 2 - 1.2 – amended - OBJECTIVE 2: Traffic Mitigation Measures: To require that proper traffic/movement impact study Transport 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 and improvements for sustainable travel modes.</p> <p>Objective 2 - 1.3 - amended - “Transport Assessments” rather than “Traffic Impact Assessments”.</p>

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		Objective 9 - 1.5 – Development of walking and cycling is being planned	<p>Objective 9 - 1.4 - amended - the emphasis should be on both sustainable travel and capacity/safety improvements.</p> <p>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 – both sustainable travel and capacity/safety improvements.</p> <p>Objective 9 - 1.5 – Public consultation and funding is a high priority</p>
		1.6 Suggestion of joint working with CIL funding	Section 1.6 - Note to BTC; Look at joint funding for CIL
		1.7 - Expectation that car parking will be provided in accordance with ESCC parking standards	Amended to include car parking to be provided in accordance with our ESCC parking standards which seek to provide an appropriate level. ESCC parking standards added to the conformity list of references for IN3
		1.8 – Assertion about 52 dwellings at Cherry Gardens	1.8 – Incorrect assertion about number of dwellings, however on advice from RDC this site has been removed from the NP
		1.9 - Unauthorised parking and in particular, is an accessibility concern for people with mobility difficulties.	1.9 - CPE which is being introduced during 2020 will have an effect of the flow of traffic and should stop vehicles parking in bus stops and other undesignated parking areas. However, the declassification of the A2100 is being discussed but is heavily reliant on the finalisation of the local link roads.

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		1.10 and 1.11 - Bus services do not meet user requirements.	1.10 and 1.11 - Would like to see increased funding of ESCC-subsidised bus services. The BACT services will need to be high on CIL spending preferences. Further text included in the Community Aspirations.
		1.12 and 1.13 - Lack of promotion of bus services	1.12 and 1.13 – Increased promotion of bus services to be raised with BTC, in particular ensuring it is included in their Strategic, and Action plans.
		2.1 and 2.2 - Concern about development above gypsum mines	2.1 and 2.2 - Under Map2, insert "Anyone undertaking or considering operations/ developments on that site are advised to contact British Gypsum regarding the existing and future extent of the mine, its depth, and land-stability in that area"
		3.1 – Design Guides, Character Appraisal and Green Infrastructure welcomed	3.1 – Noted. Appropriate support documents included In consultation. Battle CP Design Guidelines is included as ANNEXE 1 to the Plan
		3.2 - Concerns about landscape sensitivity at Cherry Gardens site	3.2 –The Cherry Gardens site (BANS117) will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15
		Policy HD 5 3.3 – The content of this policy is fully supported, though the following additions/changes are recommended to strengthen it The title is changed to 'Integration and protection of landscape character and views'. -A suggested introductory sentence 'Development proposals will be informed by landscape and visual assessment to identify site characteristics and views which may be affected and to inform required landscape mitigation.' -The final paragraph to read 'Developers will be required to submit a landscape led masterplan to accompany.....'	Agreed - The title is changed to ' Integration and protection of landscape character and views '. -A suggested introductory sentence ' Development proposals will be informed by landscape and visual assessment to identify site characteristics and views which may be affected and to inform required landscape mitigation. ' -The final paragraph to read ' Developers will be required to submit a landscape led masterplan to accompany..... '
		3.4 – Fully support the NP Environmental policies	3.4 Noted

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		4.1 to 4.3 Concern about lack of information about Historic Environment	4.1 to 4.3 Agree with suggestions. Section 3.7 retitled to Historic Environment Additional paragraphs included to give more detail about the historic character setting The character appraisal is included as ANNEXE 2 to the Plan
		4.4 – Compliance with NPPF Para 189	Policy amended to comply with requirements of NPPF para189 and para 5.3.6 makes specific reference to the NPPF
		4.5 – Confusion over mapping of historic environment 4.6 – Incorrect terminology in Figure9 4.7 – Incorrect terminology in Figure9	4.5 – Noted – map updated in accordance with RDC 4.6 – Noted - The correct term is 'Archaeological Notification Area'. 4.7 – Noted - 'Scheduled Monument'
		4.8 – Need to consider below-ground heritage assets in objective 6.	For clarity, amend objective 6 as follows: OBJECTIVE 6: Protection of Heritage Assets within the Parish Conurbation Settlements : 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. It is important that the presence of below ground heritage assets (both known and unknown) is properly considered at an early stage in development proposals.
		Site assessments	Site assessments

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		4.9 – Archaeological concerns	4.9 – Whilst we agree in principal with this, the County Archaeologist responds “Unfortunately I do not have the resources to produce a desk based archaeological assessment of these sites and suggest that you procure the services of an archaeological contractor.” The steering group believes that this matter is addressed by the LPA
		5. Biodiversity 5.1 – Assertion that there is lack of detail on biodiversity.	5. Biodiversity 5.1 – Incorrect assertion; information on SSSIs, Ancient Woodlands is in the Green Spaces analysis. Additionally the Green Infrastructure Study report shows more detail
		Policy HD2: 5.2 – Requirement of ecological impact assessments and potential impacts on biodiversity.	Policy HD2: 5.2 – The SEA addresses the information required at this stage. The potential need for an EIA will be dealt with at the planning stage.
		5.3 – Suggestion to use unallocated sites for carbon sequestration	5.3 – Noted. Some sites within the Civil Parish proposed within the SHLAA have not been selected to facilitate carbon sequestration
		Policy HD5: 5.4 - Landscaping should reflect native and local provenance where possible	Policy HD5: 5.4 – Agreed. Policy amended to include a new bullet point and an additional sentence about landscaping and added key evidence base reference, the High Weald Housing Design Guide.
		Policy EN1 5.5 – Confirming LGS sites (Kingsmead Open Space and Coronation Gardens) as receptors for reptiles	Policy EN1 5.5 - Noted
		Policy EN2 5.6 – Protection of Local Wildlife Sites, species and habitats	Policy EN2

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			5.6 – Agreed, local wildlife sites, species and habitats added to the policy
		Policy EN3 5.7 – This policy is supported	Policy EN3 5.7 – No action required
		Policy EN4 5.8 – Policy EN4 Supported but suggesting more evidence references	Policy EN4 5.8 – Agreed, added Sussex Biodiversity record centre to Key Evidence Base References
		Site allocations 5.9 – Proposing EcIA references should be included, and seek to provide a minimum 10% net gain for biodiversity	Site allocations 5.9 – Agreed. The SEA addresses the information required at this stage. The potential need for an EcIA will be dealt with at the planning stage.
		5.10 - Concern about BANS103 and it's close proximity to ancient woodland	5.10 – Site BANS103 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15
		ESCC's Appendix 1 – Bus service information to be inserted into plan	ESCC's Appendix 1 – Agreed, the bus services link has been inserted into the Community Aspirations. See http://www.cartogold.co.uk/EastSussex/map.html#BattleInsetMap
		ESCC's Appendix 2 – Concern about BANS117 (Cherry Gardens)	ESCC's Appendix 2 – The Cherry Gardens site (BANS117) will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15
O-6GJ-01	Natural England	Natural England Policy HD2 - Concern about net gain of biodiversity, SuDS.	Policy HD2 – Agreed, text added to the policy as bullet point 3 Biodiversity net gain should therefore be sought for all allocations, in the form of on-site or off-site enhancements.

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		BTC should act in line with the objectives of the High Weald AONB management plan concerning characteristics of the High Weald AONB	
		BA11 Blackfriars – Need to consider advice provided by High Weald AONB	BA11 Blackfriars – This is an RDC site and therefore full compliance should be given during the planning process
O-3NX-01	Southern Water	Policy HD8 and HD2 1. Suggest amendment to green gap, to allow possible future expansion of works. 2. Concerns on access to underground pipework on Blackfriars and land at Caldbec House	Policy HD8 and HD2 1. Agree with amendment suggested to GG03. Map have been amended 2. Agree with suggestion, new criterion 6 is added to HD2
O-2YA-01	Historic England	1. Comments on Vision Statement: Need to make clear what the plan will achieve in terms of the character of the area at the end of the plan period. 2. Need to emphasise importance of heritage	The vision covers these aspects already so it is about semantics. Minor amendment made for clarity by added the text while preserving the heritage of Battle.
		3. Policy HD1: Concerns about the allocation of land at adjacent to Cherry Tree Allotments and Mount St Car Park.	3. Policy HD1 - The Cherry Gardens site (BANS117) will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15
		4. Policy HD4 Support for the strong approach this provides to ensuring new development integrates well its surroundings.	Policy HD4 Thank you for supporting this policy
		5. Need to draw out positive features from the Character Assessment in the main body of the plan including a map of distinct character areas.	5. No change. Battle Civil Parish Listed Buildings (3.7) and the Conservation Area (3.6) have been extracted from the Character Appraisal and are already in the plan but some additional paragraphs have been included.

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
			Maps of the conservation area (3.6 Figure 3) and the Historic Environment (3.9) are already in the plan. However larger scale maps, each on one page of the document, will be included in the revised NP.
		6. Policies EN2 and EN3 Proposal to merge these policies.	6. SG Agree with the proposal to merge these policies. Note: A previous response also suggested merging of EN2 and EN3
		7. Policy EN4 - We feel this is a highly distinctive policy that reflects the particular historic, archaeological and landscape interest of Battle Parish deserving of consideration in planning decisions and, as such, are please to support it	7. Policy EN4 - Your support for this policy is noted with appreciation.

Responses from Individuals

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
O-0TE-01	5.2	1. Agreement with traffic improvement using Park-and-Ride 2. Reduce speed limit to 20mph 3. Suggesting semi-pedestrianisation of High Street	1. Feedback appreciated on a possible Park-and-Ride site. This concept is already included in Obj1 Para1.2 of the Community Aspirations. 2. Whilst this is not in the remit of the NP, Battle Town Council have agreed to pursue de-classification of the A2100 after the Queensway/A21 link road is opened 3. It is unfortunately unfeasible even with road de-classification

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
0-OHN-01	Preferred Site List Development Boundary / Appendix C: Maps	1. Suggests inclusion of some planning applications not included 2. Comments on mapping 3. Supports overall plan	1. Care Home allocation cannot be included in NP as confirmed by RDC 2. Revised submission will include maps which make clear sites that already have Planning Permission Sites that have planning permission are not included in the Neighbourhood Plan but will be shown more clearly in the revised maps, Appendix C and "Sites, Names and Reference Numbers" 3. Thank you for your support
0-ODQ-01	1.3 The Planning Context 3. The Parish background 5.1 Housing & Development 6. Implementation,	1.3.8 – EU jurisdiction concerns 3.1.1 – Definition of Telham 3.2 Definition of South East? 3.9.1 – Fig6 query on icon 5.1.1 Housing & Development – Worried that the approach to traffic problems will not be strong enough with Blackfriars and a possible site at Glengorse 6.1.5 Implementation, Monitoring & Review - Query on process.	1.3.8 The Regulations are still in force. 3.1.1 Telham is considered as a hamlet within the Civil Parish 3.2 This is from the National Government boundary definition used in Government statistics 3.9.1 The blue is a typical pinpoint marker which search maps use to show location. This one shows the Battle area. 5.1.1 – We note your concern, and whilst this is not in the remit of the NP, Battle Town Council have agreed to pursue de-classification of the A2100 after the Queensway / A21 link road is opened. The result of this should see a result in reduction of through-traffic in Battle High Street.

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
	Monitoring & Review	Would an amendment have to go to a referendum?	6.1.5 – The plan and accompanying documents will be amended to address the Reg.14 comments so that it can then be submitted to RDC for further public consultation and then for an independent examination. A referendum is undertaken after the plan has successfully passed examination. Once it has passed referendum, it will be 'made' (adopted) by RDC and become part of the Development Plan.
	General	General – Concerns on the language and grammar used in the documents	The document has been checked for errors and use of technical planning language minimised.
O-OLH-01	1.1	Section 1.1 Introduction and background:- 1- Overall thinks it is a very good plan 2 - Not addressing the lack of public transport, and congestion Concerns about the inclusion of so many pubs in the ACV if public transport is not included as it will encourage drink driving	Section 1.1 Introduction and background:- 1 - Thank you 2 - Public transport not in NP remit but is considered under Community Aspirations in Regulation 14 document Pubs are listed as Assets of Community Value and their inclusion is being reviewed along with the other assets on the list
O-9QL-01	5.1 Housing & Development	5.1 Housing & Development - Concerns that we are proposing the build on the brownfield part of site NE06, the map was hard to read and this is an incorrect assumption; map creator to check	5.1 Housing & Development - Please refer to Preferred Site maps which show area to be developed does not include the existing industrial units in the south part. NENS102 is a small section of the SHLAA site. Policy HD2 is amended as follows: Netherfield •NE NS102 (part of NE06) White House Poultry Farm: <i>up to</i> 23 dwelling

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		<p>Query on RDC Core Strategy OSS2</p> <p>Concerns that the sites will be developed on mines and unstable land, although this would be looked at if the site/s went to the Planning stage</p> <p>Asserting where gypsum is sourced in the future.</p>	<p>•NE05a and NE05r Swallow Barn off B2096: <i>up to 10 dwellings.</i></p> <p>The Regulations allows the Development Boundary to be defined in a neighbourhood plan and this has been done in discussion with RDC.</p> <p>The steering group have received more detailed mapping of gypsum undermining from British Gypsum which indicates that development can take place on the sites in Netherfield. ESCC has a mineral plan https://www.eastsussex.gov.uk/environment/planning/mineralsandwaste/</p> <p>Noted</p>
O-0BU-01	5.1 Housing & Development	<p>5.1 Housing & Development -</p> <p>Worried that infrastructure and services will not be able to cope with new housing numbers</p> <p>Feels we need more pedestrian crossings, especially at the Tesco garage</p>	<p>5.1 - Outside NP remit. However the ESCC Director of Childrens Services states that <i>"Our latest forecasts indicate there should be sufficient early years, primary and secondary school places in both Battle and Netherfield over the Neighbourhood Plan Period to meet the predicted demand for places"</i></p> <p>GP Surgery provision is outside the NP remit, however residents wishes are included in the Community Aspirations. Both of the surgeries in Battle have informed us that they currently have the capacity to take on extra patients over the Neighbourhood Plan period.</p>
	5.2 Infrastructure	5.2 Infrastructure – Road safety concerns for pedestrians on Battle Hill	5.2 - This is outside the remit of the NP. At planning application stage, the development will need to be

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
			accompanied with a Transport Assessment Plan but BTC are in consultation with Rother and ESCC to resolve the issue. The NP supports these initiatives
O-OLP-01		Approves green/strategic gap to the north of Virgins Lane	Your approval is noted. This is the intended purpose of the Green Gap
O-OLP-02		Approves green/strategic gap to the north of Virgins Lane	Your approval is noted. This is the intended purpose of the Green Gap
O-0HD-01	3. Parish Background	3.5.6 Parish Background - Concerns about the Battle Schools Greenway project and pedestrian safety on North Trade Road	3.5.6 Noted. The Battle Schools Greenway project is included in Community Aspirations
	4.2 Objectives	4.2 Objectives – Concerns that the objectives do not adequately cover road safety	4.2 – The objectives have been revised to look at mitigation of local and through-traffic in the town. Whilst this is not in the remit of the NP, Battle Town Council have agreed to pursue de-classification of the A2100 after the Queensway/A21 link road is opened. This should result in lower traffic volumes
	5.1 Housing & development	5.1 Housing & development - Aesthetically unsatisfactory allocation of parking spaces	5.1 - Noted but this is beyond the scope of the plan but Battle CP Design Guidelines outline parking provision for the future
	5.2 Infrastructure	HD6 – Concerns over social housing allocations	HD6 - Noted but there is no evidence at this stage in the plan to support a policy with housing needs of refugees.
		5.2 Infrastructure – IN2 - Lack of a positive approach in wording EN2 – Suggested change of wording	5.2 / IN2 - The policies have been strengthened and positively framed.

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		5.2 / EN3 – Request for more positive wording	5.2 / EN2 – The SG considers the wording used to be more appropriate. The policies have been strengthened and positively framed.
		5.2 / EN4 – More conformity to the SEA	5.2 / EN3 – Policies EN2 and EN3 are now combined. 5.2 / EN4 – The policies have been strengthened and positively framed.
	5.3 Environment	5.3 Environment / EN2 – Suggested change to wording	5.3 / EN2 – The SG considers the wording used to be more appropriate. The policies have been strengthened and positively framed.
		5.3 / 1.1 – Concerns over school admissions	5.3 / 1.1 - Noted but this is beyond the scope of the plan. However the ESCC Director of Childrens Services states that <i>“Our latest forecasts indicate there should be sufficient early years, primary and secondary school places in both Battle and Netherfield over the Neighbourhood Plan Period to meet the predicted demand for places”</i>
	7. Community Aspirations	7 Community Aspirations – Concerns about cycle path from Battle Abbey to CCC, and how it links with the funding of projects connected with the safety of pedestrians, in: a)Blackfriars b)Battle Hill c)Lower Lake d)Station approach	This is an incorrect assertion. The Battle Schools Greenway project, due to its potential impacts was diverted into ESCC Highways policy planning. Battle Town Council is fully engaged with ESCC Highways to improve the road safety. ESCC Policy matter. We support policies which discourage use of cars and encourage walking and cycling. It is included in the Community Aspirations (Objective1)

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
			<p>The longer distance off-road route from the Abbey to CCC is being considered within ESCC's cycling and walking implementation planning which is shown on Fig2 in the Regulation14 pre-submission document</p> <p>Noted but this is beyond the scope of the plan. Infrastructure requirements associated with any site will be addressed at the planning application process. Policy IN2 of the plan looks at maintaining and improving existing infrastructure.</p>
O-OTE-02	<p>2.3 Evidence Base</p> <p>5.1 Housing & Development</p>	<p>2.3 Evidence Base – Concern about changes to the strategic/green gaps over the time of plan development.</p> <p>5.1 Housing & Development - Concerns that this site was not noted as being in the AONB Feels if allowed will encourage backfill in Telham Concerns about the access being dangerous.</p>	<p>2.3 Changes in RDC Policy after their DaSA consultation together with NPPF para 172 strengthened AONB protection.</p> <p>The Green Gaps currently in the plan have been strengthened with regard to landscape and development pressure.</p> <p>5.1 We note these comments but following consideration, Site BANS118 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15</p>
O-OTA-01	<p>1. Introduction</p> <p>2.1 The Plan Process</p>	<p>1.3.3 Introduction – Concerns regarding complexity of NPPF</p> <p>2.1.5b Plan Process – Assertion that encouraging walking and cycling works against protecting historic sites</p>	<p>1.3.3 We understand your concerns but we cannot change Government's guidelines, however, we must conform with them.</p> <p>2.1.5b – We note your comments. No change required.</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
	2.2 Community Engagement	<p>2.1.6 – Overemphasis on Glengorse site at the expense of the habitat.</p> <p>2.2 Community Engagement – Some poorly advertised consultations and difficulty with viewing some of the online documents</p>	<p>2.1.6 – The selection criteria for all sites (including Glengorse) were applied by AECOM, taking into account the RDC 2013 SHLAA, and (NPPF) national criteria. The steering group then used locally-derived criteria, which were then applied equally to all sites.</p> <p>2.2 - Consultations were actively promoted in the local paper, on the website since 2018, BTC Newsletters, banners, leaflets and the various notice boards throughout the Parish, and in large-scale display boards during the 2019 consultation. Full details of the consultation can be seen in the Consultation Statement.</p>
	2.3 Evidence Base	<p>2.3.2 Evidence Base - Dissatisfied with the site- scoring process and lack of response to feedback in previous consultations.</p> <p>Concerns about over-emphasis on cycling and walking</p>	<p>2.3.2 – We took more notice of the 2016 AiRS survey which had 987 responses (a third of all households), compared with the 2017 feedback which had in the region of 250 responses. The same clear set of criteria was used to assess all the sites and is outlined in the site assessment document. All public feedback received has been taken into consideration but there is clear regulation which the plan needs to conform to and it is needs to get the balance right.</p> <p>We disagree with these comments as we are trying to encourage a healthy and ecologically sound lifestyle within the Parish. The AiRS document (page 27) reports that cycling was supported by 44%, and walking by 82% of respondents.</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
	3. The Parish Background	<p>3.1.1 and 3.1.3 The Parish Background – Concerns over Green Gaps</p> <p>3.3.1 – Querying statistical information, age of local population against dwelling objectives.</p> <p>Concern about demolition of bungalows.</p> <p>3.4.1 – Requirement for larger dwellings, not smaller</p> <p>3.5.2 and 3.5.3 You seem to have a typo mistake</p> <p>3.5.4 – Overemphasis on walking and cycling due to the age demographics of the Civil Parish and the linear development of the town</p> <p>3.6.1 – Concern that "Long Views into Town" will highlight the sites of Caldbec House and the land next Cherry Tree Allotments.</p>	<p>3.1.1 and 3.1.3 – Noted A full explanation of the Green Gap/Strategic Gap analysis can be found in the consultation supporting document.</p> <p>3.3.1 The majority of decisions have been guided by the AiRS survey. The majority of the respondents were aged 61+</p> <p>Demolition of dwellings is subject to the local planning authority (RDC), and their replacement with larger dwellings is not in the NP remit.</p> <p>3.4.1 Incorrect assertion as the statistics do not show this. The AiRS document shows that the majority of people in the Civil Parish would prefer smaller homes.</p> <p>3.5.2 and 3.5.3 We thank you for bringing this to our attention and this has been amended</p> <p>3.5.4 Public transport issues and the improvement thereof are included in the Community Aspirations section.</p> <p>3.6.1 – The Cherry Gardens site (BANS117) will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15 In addition to this Caldbec House is not shown on the map.</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		<p>3.7.1 – Considers that we should be discouraging development from the centre as this is Battle's historic core and where the majority of listed buildings are.</p> <p>3.9 – Concerns about the development boundary being only on one side of Hastings Road.</p> <p>Also query regarding development boundary / Beech Farm (North Trade Road)</p> <p>3.10 – Concerns on SWOT analysis details</p>	<p>3.7.1 – This intention of this section is to set the scene and not to be specific.</p> <p>3.9 There have been multiple planning applications refused which includes ones with contaminated land hence it being left out of the amended Development Boundary. Beech Farm was excluded to protect the wooded area between Thatcher Place and the new Beech Farm Development and also to restrict ribbon development in both areas.</p> <p>3.10 -swot kept and the following note added This SWOT analysis was originally drafted in 2015 (and subsequently elaborated); it represents early Steering Group analysis of the known issues within the Battle CP. Since then many consultations have modified ideas somewhat into what is now the NP. It is interesting to note how over time comments and understandings have improved the Plan detail; however this historic SWOT analysis provided important basic underlying commentary on issues that remain to this day in the Plan.</p>
	4.1 Vision	<p>4.1 Vision – Concern about Vision introduction text.</p> <p>4.1.2 – Content of 4.1.2 queried</p>	<p>4.1 Some of the aspects have been grouped. The Vision introduction paragraph has been revised to introduce the objectives and more accurately summarise them, reflecting those in the AiRS survey (Pg6)</p> <p>4.1.2 No change required.</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
	4.2 Objectives	4.2 Objectives – Mismatch of Objectives 4, 5, 6 and 7 with the selection of Glengorse as a site for development	4.2 The steering group met Rother Investment owners of Telham Court and they have clarified that they wish to remain private for business purposes therefore the comments about local aspects (Objective 5 to 6 protecting open spaces) does not apply. The house and most of the grounds have been included in the Local Heritage Listing and will not be included in the Neighbourhood Plan's proposed development sites
	5.1 Housing & Development	5.1 Housing & Development - Concern about proposed development boundary, specifically Loose Farm and Beech Farm 5.1.1 – Site allocations, specifically referring to policy HD2	5.1 The Loose Farm Site BANS118 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15. Therefore, after consultation with RDC, the steering group have not found it necessary to extend the development boundary to include the care home. Planning Applications will be made now and in the future outside of the Development Boundary but will obviously be subject to the RDC Planning regulations. With regards to Beech Farm, the steering group have decided to retain a gap between this site and the proposed development boundary to avoid further linear development. The AiRS survey showed that the majority of the responders thought protection of the countryside was important. 5.1.1 The selection criteria for all sites (including Glengorse) were applied by AECOM, taking into account the RDC 2013 SHLAA, and (NPPF) national criteria. The steering group then used locally-derived criteria, which were then applied equally to all sites. Amend Policy HD2

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		<p>Number 3 – Lack of evidence linking scoring with walking and access to the countryside.</p> <p>5.1.2 – Concern about size of development</p> <p>HD4 Quality of Design – Totally agree and approve of this policy</p>	<p>Amend the policy as follows: ...<i>supports this requirement and seeks to allocate the following sites for residential development in the following priority order:</i></p> <p>Netherfield</p> <ul style="list-style-type: none"> •NE NS102 (part of NE06) White House Poultry Farm: 23 dwellings •NE05a and NE05r Swallow Barn off B2096: 10 dwellings <p>Battle and Telham</p> <ul style="list-style-type: none"> •BA31a Glengorse: 15 dwellings •BA36 Land at Caldbec House, Caldbec Hill: 5 dwellings •BA11 Blackfriars: 220 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 <p>Number 3: only developments which have access to public footpaths have direct access to the countryside beyond.</p> <p>5.1.2 – There were no acceptable sites offered in Netherfield that were for developments of less than 6 dwellings per site.</p> <p>HD4 - Thank you</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
	5.2 Infrastructure	<p>Policy HD5 – Concerns about urban sprawl and integration of new developments near Caldbec House and Glengorse.</p> <p>5.1.7 – Concern that integration of new developments will not work because of distance to schools and railway station</p> <p>HD8 – Concerns about urban sprawl negating the use of a Green Gap</p> <p>5.1.8 – Concerns about policy not protecting heritage buildings</p> <p>Objective 2 – Concern on road congestion near Blackfriars and Glengorse exit onto A2100 Hastings Road</p>	<p>Policy HD5: Success of Planning Applications will depend on the design, which should take heed of the Battle CP Design Guidelines for Battle and the High Weald Housing Design Guide</p> <p>5.1.7 - Concerns noted, but no change required, because of the linear nature of the settlement in Battle, being on a contour-topped ridge.</p> <p>Battle town and Telham are considered connected as shown by the Development Boundary, but the proposed development boundary does exclude development on the northern side of A2100 in Telham</p> <p>5.1.8 – Policy HD8 deals with the protection of Green Gaps between settlements, and does not deal with heritage buildings</p> <p>Objective 2: ESCC Highways have accepted access to/from Blackfriars site onto A2100 to be manageable. (Planning ref RR/2019/604/P)</p>
	5.3 Environment	<p>5.2 Infrastructure -</p> <p>5.2.1</p> <p>5.2.3 – Questioning lighting and footways provision between Station Road and Battle Hill</p>	<p>Once a planning application for Glengorse has been submitted, it will be subject to the usual review by ESCC Highways.</p> <p>5.2.1 as above</p> <p>Policy IN2 as above</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		Concern about Glengorse and Procession Field in an un-named list?	5.2.3 - Outside remit of NP. BTC are in consultation with Rother and ESCC to resolve the issue. The NP supports these initiatives
		5.3 / EN3 – Statement of Glengorse species-rich landscape.	This comment appears to be in relation to 5.2.3 which covers policy IN3 regarding parking and new developments.
	5.4 Economy & Tourism	EN5 – Concerns about Glengorse and Caldbec House being omitted from the historic environment list	5.3 / Policy EN3 - Glengorse (BA31a) is a small site selected that does not conflict with EN3
		EN6 (repeat of above)	Policy EN5 / EN6 Does not and should not contain details of sites since it is establishing the general policy. However, both Caldbec House and Glengorse House and grounds, correct title “Telham Court” (excluding the site being offered) are included in the local heritage list
		5.4 Economy & Tourism - Traffic problems associated with Glengorse and Cherry Tree Allotments	Policy EN6 Does not and should not contain details of sites since it is establishing the general policy
	6. Implementation Monitoring & Review	6. Implementation Monitoring & Review – Concerns a plea not to develop Glengorse and to limit development at Caldbec House. Concerns about Cherry Tree Allotments	Policy ET1 point 4: This policy does not refer to housing but tourism. The correct site name is Cherry Gardens, which has been removed from the plan.
		7. Community Aspirations - 7.1.2 – Concern about the structuring of the objectives of Community Aspirations	Section 6 describes the Implementation Monitoring & Review at a high level and makes no specific comments about detailed sites.

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
	7. Community Aspirations Any other comments	<p>"Any other comments" - Concerns about scoring of preferred sites, Glengorse and Loose Farm cited</p> <p>Query on site visits</p> <p>Public transport concerns for Glengorse and Loose Farm</p>	<p>7.1.2. The Community Aspirations bring together a number of ideas that need to be considered by Battle Town Council. These aspirations will then need to be presented to the relevant bodies, for example RDC and ESCC.</p> <p>"Any other comments" – Firstly, Loose Farm Site BANS118 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15</p> <p>The selection criteria for all sites (including Glengorse) were applied by AECOM, taking into account the RDC 2013 SHLAA, and (NPPF) national criteria. The steering group then used locally-derived criteria, which were then applied equally to all sites.</p> <p>Yes, we have visited the sites.</p> <p>Public transport not in NP remit but is considered under Community Aspirations in Regulation 14 document .</p> <p>Loose Farm Site BANS118 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15</p>
O-OJH-01	6. Implementation Monitoring & Review 7. Community Aspirations	<p>6. Implementation Monitoring & Review - All involved at The Emmanuel Centre eagerly await the Blackfriars Development and would like to be kept informed of the progress as it proceeds</p> <p>7. Community Aspirations - Community opportunities will be many in this Blackfriars area of Battle and help will be necessary in</p>	<p>6 – Updates will come from the Local Planning Authority. Battle Town Council will also undertake annual reviews.</p> <p>7. Community Aspirations - We welcome your offer</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		meeting those needs - in terms of finance and human resources. The Emmanuel Centre is committed to helping to meet those needs and will welcome partnership	
O-OTA-02	1. Introduction	1 Introduction – A bit long and drawn out, full of Policy Numbers that have no relevance to the General Public	1. Introduction – Drafted to comply with legal regulations
	2.2 Community Engagement	2.2 Community Engagement – Feels we lack public engagement from the beginning.	2.2 Community Engagement - We believe we have had sufficient engagement with the community via public consultations, drop-in sessions, Parish Assemblies, Parish newsletters, newspapers, and social media
	2.3 Evidence Base	2.3 Evidence Base – Supportive of independent AECOM report	2.3 Thank you very much. No action required
	5.1 Housing & Development	5.1 Housing & Development - Against Glengorse development and states the entrance to be too near to the Blackfriars proposed exit	5.1 Housing & Development - The steering group met Rother Investment owners of Telham Court and they have clarified that they wish to remain private for business purposes. The house and most of the grounds have been included in the Local Heritage Listing and will not be included in the Neighbourhood Plan's proposed development sites. ESCC Highways have accepted access to/from Blackfriars site onto A2100 to be manageable. (Planning ref RR/2019/604/P) Once a planning application for Glengorse has been submitted it will be subject to the usual review by ESCC Highways.
		5.1 Housing & Development -	

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		Approves of Loose Farm (BANS118) as it is a large site for a small development and is well screened from the AONB.	5.1 Housing & Development - The Loose Farm Site BANS118 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15
		5.1 Housing & Development - Thinks all the sites should small in number.	5.1 Housing & Development – The sites shortlisted by the steering group for potential development, following the AECOM review, have all been below 25 dwellings in number as preferred by residents is the 2016 AiRS survey, whereas some sites given planning permission by RDC exceed this number.
	5.2 Infrastructure	5.2 Infrastructure - Thinks promoting walking and cycling impractical for Battle.	5.2 Infrastructure – No further action. In the AiRS survey respondents thought that cycling (44%) and walking (82%) should be encouraged.
	5.3 Environment	5.3 Environment - Battle being a very rural town I think we are going to have to accept that the environment is going to be affected. Blackfriars is going to be awful in this respect but I realise that you have no control over this	5.3 Environment – No change needed
	5.4 Economy & Tourism	5.4 Economy & Tourism - You need to keep development out of the town centre because this will not look good when tourists come to visit the town	5.4 Economy & Tourism - We are aiming to keep developments in the town centre to a minimum. For example The Cherry Gardens site (BANS117) will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15
	6. Implementation, Monitoring & Review	6. Implementation, Monitoring & Review – More transparency required to explain how some of your decisions are made	6. Implementation, Monitoring & Review - The selection criteria for all sites were applied by AECOM, taking into account the RDC 2013 SHLAA, and (NPPF) national criteria.

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
	<p>7. Community Aspirations</p> <p>Other Comments</p>	<p>7. Community Aspirations - These are well thought through but again no reference as to which previous consultation these views were taken from</p> <p>Other Comments -</p> <p>a) Complaint about size of print, and</p> <p>b) Explanation on how decisions were reached and what part does AECOM take in decision making?</p>	<p>The steering group then used locally-derived criteria, which were then applied equally to all sites. For further information see PowerPoint presentations on NP website ("Original Site Selection Presentation 2019" and "Final Site Selection Presentation") for information on how decisions were made.</p> <p>7. Community Aspirations - All the Aspirations were taken from feedback at the Public Consultations and this Regulation 14 review</p> <p>Other Comments -</p> <p>a) Size of print can be adjusted on a computer screen.</p> <p>b) The selection criteria for all sites were applied by AECOM, taking into account the RDC 2013 SHLAA, and (NPPF) national criteria.</p> <p>The steering group then used locally-derived criteria, which were then applied equally to all sites. For further information see PowerPoint presentations on NP website ("Original Site Selection Presentation 2019" and "Final Site Selection Presentation") for information on how decisions were made.</p>
O-0TG-05	Any Other Comments	<p>(As requested by the author we have redacted the first sentence of this section.)</p> <p>[The respondent wrote about some sections, and referred their details to "Any Other Comments" in the section below where they are completely covered]</p> <p>Any Other Comments – There a few mistakes I have noticed reading through:</p> <p>Errors</p>	<p>(As requested by the author we have redacted the first sentence of this section.)</p> <p>The respondent wrote about some sections, and referred their details to "Any Other Comments" in the section below where they are completely covered]</p> <p>Any Other Comments - Noted. Commented on below.</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		<p>Care Home – Incorrect historical listing with reference to Loose Farm (BANS118)</p> <p>Scoring of sites and preferred order concerns -</p> <p>Respondent is unhappy with the development area; thinks it should include area to Cedarwood Care Home, Selenex Filtration, Woodworks at Hitchin Tan and Builders at Denton House.</p> <p>A number of personal views expressed about a wide range of development sites.</p> <p>Further comments concerning Loose Farm (BANS118) and previous sites, and proximity to listed buildings, for example near Mount Field car park Cherry Gardens (BANS117) and Glengorse (BA31a)</p>	<p>The Loose Farm Site BANS118 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15.</p> <p>Scoring of sites - The selection criteria for all sites were applied by AECOM, taking into account the RDC 2013 SHLAA, and (NPPF) national criteria. The steering group then used locally-derived criteria, which were then applied equally to all sites. For further information see PowerPoint presentations on NP website ("Original Site Selection Presentation 2019" and "Final Site Selection Presentation") for information on how decisions were made. Going forward to Regulation 15 and 16 the priority order is no longer part of the policy.</p> <p>The Loose Farm Site BANS118 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15.</p> <p>The Neighbourhood Plan has made specific proposals about all sites.</p> <p>The earlier consultation enabled better understanding of the locality and resulted in a proposal for Loose Farm Site BANS118 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15. The Cherry Gardens site (BANS117) will not be</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		<p>The respondent wants the whole of Telham Court protected; was a public space until ceased being a school and riding centre.</p> <p>Encouraging employment - Worried about lack of employment provision in the NP</p>	<p>included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15</p> <p>The steering group met Rother Investment owners of Telham Court and they have clarified that they wish to remain private for business purposes. The house and most of the grounds have been included in the Local Heritage Listing and will not be included in the Neighbourhood Plan's proposed development sites</p> <p>Encouraging employment - Our amended policy ET2 further supports the encouragement of employment. BTC have supported the Planning Application for the North Trade Road Care Home in 2019</p>
O-OTG-06		First line of text redacted from point 2 at the request of the respondent	<p>First line of text redacted from point 2 at the request of the respondent</p> <p>This submission appears to be a direct duplication of O-OTG-05 therefore see our responses accordingly</p>
O-OTQ-01		<p>Concerns about consultation process</p> <p>Comments on the wealth of history and wildlife at Glengorse (BA31a). The respondent would like the whole of Telham Court estate protected.</p>	<p>We believe we have had sufficient engagement with the community via public consultations, drop-in sessions, Parish Assemblies, Parish newsletters, newspapers, and social media</p> <p>The steering group met Rother Investment owners of Telham Court and they have clarified that they wish to remain private for business purposes. The house and most of the grounds have been included in the Local</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		<p>Concern about Heritage listing and concerns about the playing fields at Glengorse (BA31a)</p> <p>Concerns that the whole of Glengorse (BA31a) site is being developed.</p> <p>Concern about congestion when Blackfriars site is developed</p> <p>Concerns about walking distances to the town centre and the scoring system.</p> <p>3. Development Area -</p>	<p>Heritage Listing and will not be included in the Neighbourhood Plan</p> <p>The development site, Glengorse (BA31a), is carefully located and shielded from the old house. Only a small section of the land has been allocated for new building</p> <p>The respondent makes an incorrect interpretation as only a small section of the playing fields has been allocated in the NP.</p> <p>ESCC Highways have accepted access to/from Blackfriars site onto A2100 to be manageable. (Planning ref RR/2019/604/P) Once a planning application for Glengorse has been submitted, it will be subject to the usual review by ESCC Highways.</p> <p>The walking distance to the centre of town is just one of the many criteria used to select sites.</p> <p>The 2017 Consultation only forms part of the overall evaluation process resulting in the choice of sites. AECOM, an independent government recommended body, shortlisted the sites. AiRS Survey indicated support for walking and cycling in Section 14</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		<p>Concerns that the whole Glengorse (BA31a) site is being developed</p> <p>Would like to see smaller developments than 20 to be considered, and cites smaller development sizes numbers being preferred.</p> <p>4. Conclusion – Respondent thinks that residents opinions have not been noted in previous consultations and proposes to vote 'no'. But if changes are made, may change their mind.</p>	<p>3. Development Area - The respondent makes an incorrect interpretation as only a small section of the playing fields has been allocated in the NP.</p> <p>The sites shortlisted by the steering group for potential development, following the AECOM review, have all been below 25 dwellings in number as preferred by residents in the 2016 AiRS survey, whereas some sites given planning permission by RDC exceed this number. Both the AECOM review and the AiRS survey were completed independently of the steering group</p> <p>4. Community Engagement - We believe we have had sufficient engagement with the community via public consultations, drop-in sessions, Parish Assemblies, Parish newsletters, newspapers, and social media</p>
O-0EG-01		<p>Cherry Gardens (BANS117) – Concerned about the width of access road & may cause damage to property. Worried about the damage to the fields which are steeply sloping.</p>	<p>The Cherry Gardens site (BANS117) will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15</p>
O-0TG-09		<p>Loose Farm (BANS118) – Argues against 3 of the residents at the bottom of lane and puts forwards his views that the site is well screened, the access road is suitable for the residents and car users and business now and 3 to 4 properties will not affect anyone at the bottom of lane.</p> <p>Worries that the development at Glengorse (BA31a) will start small but will lead to more building if it is included in the plan now</p>	<p>The Loose Farm Site BANS118 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15</p> <p>Glengorse site (BA31a) has been included in the Neighbourhood Plan as a small area that is acceptable for development, without impacting the larger area of</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		Cherry Gardens site (BANS117) – Concerns about development close to the conservation area and impact of development on tourism	Telham Court, which has been included in the Local Heritage Listing to afford appropriate protection. The Cherry Gardens site (BANS117) will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15.
O-OJH-03	1.1 Introduction	1.1 Introduction - Criticism of independent report with allegations that the author did not address issues regarding honesty and integrity and natural justice. Allegations of impropriety of an individual on steering group. Assertions that they had undeclared vested interests and influenced the strategic direction of the plan. Criticism of the role of the local authority supporting the plan despite above issues	1.1 Introduction – As summarised, these matters have been referred to Battle Town Council for consideration using their complaints procedure. The Full Council concluded that the steering group had not acted in a manner which had been influenced by personal interests. The criticism of the independent report was incorrectly attributed by the respondent to RDC.
O-OTG-01	1.1 Introduction 1.2 Neighbourhood Area	1.1 Introduction - Querying the reduction in size of the Strategic Gap 1.2 Neighbourhood Area - Concerns about the map being too small Concerns that site selection is not in line with NPPF references to “Green Belt”	1.1 Introduction - The extent of the strategic gaps was amended on the advice of RDC after the April 2019 consultation. 1.2 Neighbourhood Area - It is agreed that maps will be individually at least A4 in size for the presentation to RDC This is just one factor within the NPPF that is used for planning purposes. None of the sites selected in the NP is “Green Belt” land

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
	2.1The Policy Context	2.1The Policy Context - Questions about the independent examination. Concerns about Loose Farm (BANS118)	2.1The Policy Context – All Neighbourhood Plans are required to be subject to independent examination by the Government planning inspectorate prior to referendum. The Loose Farm Site BANS118 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15.
	2.2 Community Engagement	2.2 Community Engagement – Respondent states “Very limited public viewing of the plans was available”	2.2 Community Engagement – We believe we have had sufficient engagement with the community via public consultations, drop-in sessions, Parish Assemblies, Parish newsletters, newspapers, and social media
	2.3 Evidence Base	2.3 Evidence Base – Inconsistency on site weighting	2.3 Evidence Base - The selection criteria for all sites were applied by AECOM, taking into account the RDC 2013 SHLAA, and (NPPF) national criteria. The steering group then used locally-derived criteria, which were then applied equally to all sites. For further information see PowerPoint presentations on NP website (“Original Site Selection Presentation 2019” and “Final Site Selection Presentation”) for information on how decisions were made
	3. The Parish Background		3.1.3 NS118 - The Loose Farm Site BANS118 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15.

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		3.5.3 Concern about description of Telham and the public transport service	3.5.3 Agreed wording could be better. Deleted the word 'boast' and replaced with 'has'. Public transport not in NP remit but is considered under Community Aspirations in Regulation 14 document
		Concerns about the distance from Loose Farm site (BANS118) to services	We note your concerns, however, the Loose Farm Site BANS118 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15.
		3.9 Concerns about the map being too small	3.9 It is agreed that maps will be individually at least A4 in size for the presentation to RDC
	4. Vision	4. Vision Statement – Concerns that this has not been applied (specifically relating to Loose Farm BANS118)	4. Vision Statement - The Loose Farm Site BANS118 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15
	5. Housing & Development	5. Housing & Development - Objectives 3, 5, 6 and 9 - Concerns about how the objectives specific to BANS118 have been applied.	5. Housing & Development - The Loose Farm Site BANS118 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15.
	5.2 Infrastructure	5.2 Infrastructure Policy IN1 – Concerns about dangerous access onto Hastings Road from Loose Farm (BANS118)	5.2 Infrastructure Policy IN1 - The Loose Farm Site BANS118 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15.
		5.3 Countryside and Historic Environment - Policy EN4 and EN5 - Concerns about nonconformity to Loose Farm (BANS118)	5.3 Countryside and Historic Environment – Policy EN4 and EN5- The Loose Farm Site BANS118 will not be included in

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
	5.3 Historic Environment 6. Implementation, Monitoring & Review 7. Community Aspirations SEA Comments	<p>6. Implementation, Monitoring & Review - Respondent states "There is no detail about how the referendum will be carried out. Who will oversee this? Will a ballot be secret? Will a body independent of the Battle Council carry it out? How could the validity be tested"</p> <p>7. Community Aspirations 2.3 and 5.3 – Concerns with regarding to protecting green spaces at Loose Farm (BANS118)</p> <p>SEA / 2.3 - All comments from respondent refer to Loose Farm site (BANS118) regarding pollution, congestion and flooding.</p> <p>Table 3 - Respondent claims flawed scoring and assessment of AECOM report for Loose Farm site (BANS118)</p> <p>Respondent alleges that the owner of Loose Farm site (BANS118) was on the committee and questions whether the Council's Code of Conduct was adhered to. Alleges the process is fundamentally flawed and this site should be withdrawn.</p>	<p>the Neighbourhood Plan Proposal Submission to RDC for Regulation 15.</p> <p>6. Implementation, Monitoring & Review – The referendum will be conducted by RDC on the same basis as either a local Council or General Election</p> <p>7. Community Aspirations 2.3 and 5.3 – The Community Aspirations section will be amended, however, the Loose Farm Site BANS118 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15.</p> <p>SEA / 2.3 - The Loose Farm Site BANS118 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15</p> <p>Table 3 - The Loose Farm Site BANS118 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15</p> <p>These allegations are incorrect. These complaints were raised with BTC, investigated and not upheld.</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
	Any other comments	Any other comments- (respondent has simply entered "East Sussex", which is a typing error)	Any other comments- No action required
O-0TG-02	Any other comments	<p>Any other comments -</p> <p>1. Concerning Loose Farm site (BANS118) - Respondent wants the Development Plan extended to down to where it is busiest in the lane at the bottom at Cedarwood Care Home and Selenex, one of two the main employers of the area (5 in total at Loose Farm). You need to encourage businesses. Feels the site is is well screened by the care home.</p> <p>2. The respondent indicates that the protection was on the wrong building.</p> <p>3. The respondent states "Your idea to have new homes built in town because people will walk won't work plus it will damage the history of the town"</p>	<p>Any other comments -</p> <p>1. Loose Farm Site BANS118 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15. Therefore, no extension of the development boundary is required.</p> <p>2. We are aware of the incorrect Historic England listing and this has been corrected</p> <p>3. We disagree with these comments as we are trying to encourage a healthy and ecologically sound lifestyle within the Parish. The AiRS document (page 27) reports that walking was supported by 82% of respondents. The Battle Heritage Charter Group has compiled a list of buildings which have not been identified by Historic England and included them in a local heritage list. There are no longer any sites being proposed for development in the town centre within the Neighbourhood Plan.</p>
O-0TG-03		The respondent indicates a preference for development at Loose Farm (BANS118) rather than Glengorse (BA31a) because of visibility of the site and light pollution.	<p>The Loose Farm Site BANS118 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15.</p> <p>With regards to Glengorse (BA31a) the steering group</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		<p>Respondent suggests an extension of the development boundary along the Hastings Road and to include the care home at Loose Farm and beyond.</p> <p>The respondent indicates that the protection was on the wrong building.</p>	<p>met Rother Investment owners of Telham Court and they have clarified that they wish to remain private for business purposes. The house and most of the grounds have been included in the Local Heritage Listing and will not be included in the Neighbourhood Plan's proposed development sites</p> <p>Even though Loose Farm (BANS118) was considered for development the boundary extension was not deemed necessary. However the Loose Farm Site BANS118 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15.</p> <p>We are aware of the incorrect Historic England listing and this has been corrected</p>
O-OTG-04		The respondent comments about scoring of sites within the Loose Farm area.	<p>Only one site in the Loose Farm area (BANS118) was included in the Regulation 14 consultation documents because other landowners did not support other developments.</p> <p>However the Loose Farm Site BANS118 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15</p>
O-OTA-04		1 and 3. Respondent indicates difficult and dangerous access onto main road from Glengorse, bearing in mind the big new estate.	<p>1 and 3. ESCC Highways have accepted access to/from Blackfriars site onto A2100 to be manageable. (Planning ref RR/2019/604/P)</p> <p>Once a planning application for Glengorse has been submitted, it will be subject to the usual review by ESCC Highways.</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		<p>2. They feel the site should be protected as it has abundant wildlife.</p> <p>Worried that if permission is given to build a few houses, more will follow.</p>	<p>2. The steering group met Rother Investment owners of Telham Court and they have clarified that they wish to remain private for business purposes. The house and most of the grounds have been included in the Local Heritage Listing and will not be included in the Neighbourhood Plan's proposed development sites.</p>
O-0BN-01		<p>1. Respondent objects to any development on BA31.</p> <p>2. States the whole estate should be protected, mentioning mature trees, wildlife, site character, pedestrian and road access.</p> <p>3. Distance from key services in the town.</p> <p>4. Increased traffic leading to congestion.</p> <p>5. Respondent states "If you do not protect the high standard of housing in Battle you will not be protecting it and maintaining its history and the country feel that tourists want to come and see. These are important to tourism which is one of its main draws"</p>	<p>1. Only BA31a which is a small part of BA31 is being included in the Neighbourhood Plan.</p> <p>2. The steering group met Rother Investment owners of Telham Court and they have clarified that they wish to remain private for business. The house and most of the grounds have been included in the Local Heritage Listing and will not be included in the Neighbourhood Plan's proposed development sites</p> <p>3. There are public transport links to and from the centre of Battle in addition to a nearby rail service.</p> <p>4. ESCC Highways have accepted access to/from Blackfriars site onto A2100 to be manageable. (Planning ref RR/2019/604/P)</p> <p>Once a planning application for Glengorse has been submitted, it will be subject to the usual review by ESCC Highways.</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		6. Respondent states "You have low on your list of sites two smaller ones which I think would be much better and have less impact; Loose Farm and Marley Lane. They small sites and will not affect their neighbouring properties as much as the Blackfriars and Glengorse ones will"	5. All planning applications should comply with the Battle CP Design Guidelines and High Weald Housing Design Guide. 6. The Loose Farm Site BANS118 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15. The Marley Lane Site BANS103 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15
O-OTX-08	1.Introduction	1.Introduction - Respondent supports the Blackfriars/Stars Mead site and states that access to Glengorse (BA31a) and Blackfriars will be too close together and make accessing and exiting from the site even more dangerous. The sight line to the left and right is not good and there have been accidents at the junction. The hill is steep to Glengorse and precludes encouraging walking. Respondent states "The house at grounds at Glengorse must and should be protected. You have a lot on protecting important and green sites well the house, grounds and estate here should be and not built on"	1.Introduction - ESCC Highways have accepted access to/from Blackfriars site onto A2100 to be manageable. (Planning ref RR/2019/604/P) Once a planning application for Glengorse has been submitted, it will be subject to the usual review by ESCC Highways. The steering group met Rother Investment owners of Telham Court and they have clarified that they wish to remain private for business. The house and most of the grounds have been included in the Local Heritage Listing and will not be included in the Neighbourhood Plan's proposed development sites
O-OTG-11		Respondent states that the development area should be extended as too restrictive rather than permissive, to include properties that have been granted planning permission for expansion.	Loose Farm site (BANS118) will not be included in the Neighbourhood Plan submission to RDC for Regulation 15. Therefore, no extension of the development boundary is required.

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		<p>The respondent has concerns that the Development Company will keep expanding Glengorse and quotes various figures: 18, 35 and 70.</p> <p>Supports development at Loose Farm (BANS118). Considers a site of 3 to 4 houses would not make much difference and is well screened</p> <p>Respondent adds "Well done for all your work"</p>	<p>The Regulation 14 consultation only states 20 dwellings. This will be revised to read "up to 20 dwellings"</p> <p>The house and most of the grounds have been included in the Local Heritage Listing and will not be included in the Neighbourhood Plan's proposed development sites</p> <p>The Loose Farm Site BANS118 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15.</p> <p>Thank you and we appreciate your comments.</p>
O-0TG-12		<p>Respondent considers new houses on Loose Farm (BANS118) will help alleviate parking problems that occur near the care home.</p> <p>Respondent considers the development boundary needs to be expanded at Loose Farm.</p>	<p>The Loose Farm Site BANS118 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15.</p> <p>Loose Farm Site BANS118 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15. Therefore, no extension of the development boundary is required.</p>
O-0LJ-01		<p>Respondent states "Notes copied from your 2017 consultation. Nothing has changed. You should be protecting this house and grounds from developers not encouraging them"</p>	<p>The 2017 consultation data has been superseded as the Plan has progressed.</p> <p>For further information see PowerPoint presentations on NP website ("Original Site Selection Presentation 2019" and "Final Site Selection Presentation") for information on how decisions were made.</p> <p>Telham Court and most of the grounds have been included in the Local Heritage Listing and will not be included in the Neighbourhood Plan.</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		Respondent makes multiple comments about Glengorse (BA31a), these include protecting heritage, parking, wildlife, public transport, traffic access, a covenant on Telham Court, another large site Starrs Mead (aka Blackfriars), overdevelopment, compromising the strategic gap, pollution, harm to AONB, light pollution, previous planning applications contrary to Rother District Council's Local Plan, strain upon local services and the doctors surgeries, schools, dentist	<p>Public transport not in NP remit but is considered under Community Aspirations in Regulation 14 document</p> <p>Schools are outside of the NP remit. However, the ESCC Director of Childrens Services states that <i>"Our latest forecasts indicate there should be sufficient early years, primary and secondary school places in both Battle and Netherfield over the Neighbourhood Plan Period to meet the predicted demand for places"</i></p> <p>GP Surgery provision is outside the NP remit; however, residents' wishes are included in the Community Aspirations. Both of the surgeries in Battle have informed us that they currently have the capacity to take on extra patients over the Neighbourhood Plan period.</p> <p>Road safety is outside of the remit of NP, however, BTC are in consultation with Rother and ESCC to resolve the issue. The NP supports these initiatives.</p> <p>ESCC Highways have accepted access to/from Blackfriars site onto A2100 to be manageable. (Planning ref RR/2019/604/P) . Once a planning application for Glengorse has been submitted, it will be subject to the usual review by ESCC Highways.</p>
O-0LJ-02		The respondent is not happy with development at BA31a (Glengorse), because of road congestion, Blackfriars development	ESCC Highways have accepted access to/from Blackfriars site onto A2100 to be

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		and previously refused planning applications (1987 and 1988) Considers we should be protecting the house and grounds and not building on them	manageable. (Planning ref RR/2019/604/P) Once a planning application for Glengorse (BA31a) has been submitted, it will be subject to the usual review by ESCC Highways. Previous historic planning applications were a matter for Rother District Council. The house and most of the grounds have been included in the Local Heritage Listing and will not be included in the Neighbourhood Plan's proposed development sites
O-0LJ-03		The respondent objects to the proposed development at Glengorse (BA31a). The respondent has concerns about impact on unique history of BA31a Respondent has concerns over traffic congestion and safety due to Blackfriars being close to the proposed Glengorse development . Respondent states "Many of the residents in this area are elderly and your idea that being in Glengorse will encourage people to walk more will not be successful. The hill is steep, the locations where people want to go could be miles away as Battle is very long and doesn't have a true centre"	The house and most of the grounds have been included in the Local Heritage Listing and will not be included in the Neighbourhood Plan's proposed development sites ESCC Highways have accepted access to/from Blackfriars site onto A2100 to be manageable. Planning ref RR/2019/604/P) Once a planning application for Glengorse (BA31a) has been submitted, it will be subject to the usual review by ESCC Highways. We disagree with these comments as we are trying to encourage a healthy and ecologically sound lifestyle within the Parish. The AiRS document (page 27) reports that walking was supported by 82% of respondents.

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		<p>The respondent would prefer smaller developments of up to 5 houses.</p> <p>The respondent is concerned about further development at Glengorse (BA31a)</p> <p>The respondent states "I notice that your development plan only runs along the existing houses along Hastings Road. You should keep it the same here for exactly the same reason"</p>	<p>The sites shortlisted by the steering group for potential development, following the AECOM review, have all been below 25 dwellings in number as preferred by residents in the 2016 AiRS survey, whereas some sites given planning permission by RDC exceed this number.</p> <p>The house and most of the grounds have been included in the Local Heritage Listing and will not be included in the Neighbourhood Plan's proposed development sites</p> <p>The respondent wants the development boundary retained as shown in the RDC Local Plan 2016. Map 1 in the Regulation 14 consultation document clearly shows the necessary extensions to the former development boundary.</p>
O-0TQ-02		<p>The respondent objects to the proposed development at Glengorse (BA31a).</p> <p>Respondent states that NS118 and NS103 are good sites for development</p> <p>The respondent states that the development boundary should be extended along Hastings Road and to include the Loose Farm businesses.</p> <p>The respondent foresees demolition of houses and bungalows and the squashing in of 3 more.</p>	<p>The house and most of the grounds at Telham Court (Glengorse) have been included in the Local Heritage Listing and will not be included in the Neighbourhood Plan's proposed development sites.</p> <p>The Loose Farm Site BANS118 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15. The Marley Lane Site BANS103 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15.</p> <p>The development boundary as shown in Map 1 for Battle and Telham has a few specific extensions only, which does not include Hastings Road, Loose Farm, or Beech Farm.</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		<p>Also queries why the development boundary doesn't extend to include Beech Farm (North Trade Road)</p> <p>Respondent questions where the Town Centre is, with respect to developments, walking and car use.</p> <p>Respondent states "encouraging walking is wrong"</p> <p>Respondent is concerned about lack of employment plans.</p>	<p>With regards to Beech Farm, the steering group have decided to retain a gap between this site and the proposed development boundary to avoid further linear development.</p> <p>The Planning Applications will be made now and, in the future, outside of the Development Boundary but will obviously be subject to the RDC Planning regulations.</p> <p>The Neighbourhood Plan does not include any developments in the centre of town. The Cherry Gardens site (BANS117) will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15.</p> <p>We disagree with these comments as we are trying to encourage a healthy and ecologically sound lifestyle within the Parish. The AiRS document (page 27) reports that cycling was supported by 44%, and walking by 82% of respondents.</p> <p>Employment plans have been addressed in the revised Policy ET2.</p>
O-OJR-04	<p>1.1 Introduction</p> <p>5.1 Housing</p>	<p>1.1.7 – Respondent states "I would like to know who were the 'volunteers representing a range of interests' whose opinions informed the decision regarding the Caldbec Hill 'Open Space', and who supported ESCC plans to fence it off and remove the neighbourhood parking space. Whose interests did they represent? Certainly not those of local residents who depend on parking there"</p>	<p>1.1.7 – ESCC who are the land owners made this decision, NOT the steering group volunteers.</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		<p>5.1 Housing - Respondent states "I am very concerned, for contemporary and heritage reasons, about the allocation of 9 new dwellings on the Caldbec House site". (BA36)</p> <p>1. Respondent comments "Policy HD1 on page 29 states that 'All new housing developments should take place within the existing Development Boundary.' The map on Fig 9, page 24 shows that this boundary excludes the Caldbec House site. Why and how was the above restriction over-ridden in this case? "</p> <p>2. Concerns over inappropriate over-development on the BA36 site.</p> <p>3. The respondent has concerns about unsuitable access to BA36</p>	<p>5.1 Housing – Following discussions between the land owner of the Caldbec House site (BA36a) and the steering group, a figure of 9 dwellings was shown in the Regulation 14 pre-submission document; this will be amended to show <u>up to 9</u> dwellings following discussions with RDC.</p> <p>1. The development boundary has been revised as shown on Map1 The map on Fig9 is solely showing the Historic Environment. Figures 4,5,8 and 9 explanation text added in their captions that the development boundary overlay is the original one whereas the new one is on maps in Appendix C .</p> <p>2. After consultation with RDC a capacity of <u>up to 9</u> dwellings on BA36a will be proposed in the Neighbourhood Plan. The selection criteria for all sites were applied by AECOM, taking into account the RDC 2013 SHLAA, and (NPPF) national criteria. The steering group then used locally-derived criteria, which were then applied equally to all sites. For further information see PowerPoint presentations on NP website ("Original Site Selection Presentation 2019" and "Final Site Selection Presentation") for information on how decisions were made.</p> <p>3. The NP has not determined which of many access points could be used for site BA36a.</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
	5.3 Environment	<p>4. Respondent asserts that development on Caldbec Hill could desecrate important archaeological remains of great local and national historic significance.</p> <p>5.3 Environment - The respondent refers to The statement in 5.3.4 on page 42 of the Battle NP is highly relevant here: '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.' Also 5.3.6 on page 43: 'The policy seeks to protect heritage assets even where they are not in a Conservation Area.'</p> <p>BA GS 05 - The respondent comments on a number of policy matters regarding the Local Green Space at the summit of Caldbec Hill on Whatlington Road and the ESCC decision to fence-off the entire green space.</p> <p>The respondent lists various correspondence with BTC and ESCC concerning the loss of parking on Caldbec Hill.</p>	<p>This will be determined by a developer in any planning application.</p> <p>4. Planning applications in sensitive areas will in most cases be subject to archaeological review.</p> <p>5.3 Environment - The BTC Heritage Charter working group has independently assessed heritage assets.</p> <p>BAGS05 - The landowner, ESCC, has determined for safety reasons there shall be no parking within the local green space. ESCC revised their position. The Local Green Spaces document will be amended to reflect their decision.</p> <p>This is not within the remit of the Neighbourhood Plan.</p>
O-0TX-09		<p>1. The respondent raises concerns about Glengorse BA31 access road considers it hazardous and with the Blackfriars site access so close will make Glengorse even more deadly.</p>	<p>1. ESCC Highways have accepted access to/from Blackfriars site onto A2100 to be manageable. (Planning ref RR/2019/604/P) Once a planning application for Glengorse (BA31a) has been submitted, it will be subject to the usual review by ESCC Highways.</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		<p>2. The respondent has concerns regarding further development in addition to the Neighbourhood Plan proposal of 20 homes and destroying the countryside with its wildlife.</p> <p>3, Believes no-one has taken any notice of the comments they made last time.</p>	<p>2. The steering group met Rother Investment owners of Telham Court and they have clarified that they wish to remain private for business. The house and most of the grounds have been included in the Local Heritage Listing and will not be included in the Neighbourhood Plan's proposed development sites</p> <p>3. The steering group do not share this view as the selection criteria for all sites were applied by AECOM, taking into account the RDC 2013 SHLAA, and (NPPF) national criteria.</p> <p>The steering group then used locally-derived criteria, which were then applied equally to all sites.</p> <p>For further information on the changes that have been made in the plan please refer to the Powerpoint presentations on NP website ("Original Site Selection Presentation 2019" and "Final Site Selection Presentation")</p>
O-0HS-01	<p>3. Parish Background</p> <p>4.2 Objectives</p> <p>5.1 Housing & Development</p>	<p>3. Parish Background - 3.8.6 - The respondent considers the bus timetable shown in the Neighbourhood Plan Regulation 14 to be incorrect, specifically Battle to Heathfield bus service.</p> <p>4.2 - OBJECTIVE 5 - Approves of Green Spaces Listing.</p> <p>5.1 Housing & Development - We should incorporate the High Weald Housing Design Guide</p>	<p>3. Parish Background - 3.8.6 – This assertion is incorrect. There is currently a bus service once every weekday from Battle to Heathfield (route 225), however, public transport is not in NP remit but it is considered under Community Aspirations in Regulation 14 document</p> <p>4.2 - OBJECTIVE 5 - Thank you for your support on our Green Spaces policies.</p> <p>5.1 Housing & Development –</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
	5.2 Infrastructure	5.2 Infrastructure - Access must be sought between Blackfriars and the station	We agree with your comment, but should also take into account the Battle CP Design Guidelines, and the High Weald Housing Design Guide. 5.2 Infrastructure - We are in total agreement with your comment, however, this is a matter between RDC planning and Network Rail. Also agreed, BTC in discussion with RDC concerning this issue.
	5.3 Environment	5.3 Environment - The respondent considers it is of utmost importance that Green Spaces are afforded full protected status.	5.3 Environment - We are in total agreement with your comment and by listing the Local Green Spaces in the Neighbourhood Plan they will be protected.
	5.4 Economy & Tourism	5.4 Economy & Tourism - Concerns about lack of a Tourist Information Centre	5.4 Economy & Tourism – Whilst we agree with your comment this is not within the remit of the Neighbourhood Plan. However, Battle Town Council is proposing that a Tourist Information Point is located in the Almonry.
O-0JJ-01	5.1 Housing & Development	5.1 Housing & Development - The respondent's comments are summarised as follows: Complaint about lack of transparency and honesty. Allegations of impropriety of some people on steering group. Assertions that they had undeclared vested interests and influenced the strategic direction of the plan.	5.1 Housing & Development - As summarised, these matters have been referred to Battle Town Council for consideration using their complaints procedure. The Full Council concluded that the steering group had not acted in a manner which had been influenced by personal interests.

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		Complainant has contacted "the Ministry of Housing" and considering further legal action	
O-0TX-10	<p>1.1 Introduction</p> <p>1.2 Neighbourhood Area</p> <p>7. Comments</p>	<p>1.1Introduction - The respondent states "Your maps, scoring charts and the whole document to be frank are difficult to read online"</p> <p>7. Comments - The respondent states this is an AONB area and the grounds around the house are home to many forms of wildlife which needs better protection.</p> <p>The respondent raises concerns about Glengorse BA31 access road, considers it dangerous and with the Blackfriars site access so close will make Glengorse even worse with increasing levels of air pollution due to queuing traffic.</p> <p>The respondent suggests developments outside the town centre to protect the town's historic centre.</p>	<p>1.1Introduction - Larger scale paper copies are available for inspection at the Almonry. It is agreed that maps will be individually at least A4 in size for the presentation to RDC.</p> <p>7. Comments - The whole of the Civil Parish is within the AONB and therefore is afforded a very high level of protection. The house and most of the grounds have been included in the Local Heritage Listing and will not be included in the Neighbourhood Plan's proposed development sites</p> <p>ESCC Highways have accepted access to/from Blackfriars site onto A2100 to be manageable. (Planning ref RR/2019/604/P) Once a planning application for Glengorse (BA31a) has been submitted, it will be subject to the usual review by ESCC Highways.</p> <p>We sympathise with your comments. Please note that the Neighbourhood Plan is being revised to show that we are only recommending development outside of the town centre. For example, The Cherry Gardens site (BANS117) will not be included in the Neighbourhood</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
			Plan Proposal Submission to RDC for Regulation 15.
O-0HU-01	4.2 Objectives	4.2 Objectives - Objective 2: Would like to see 'Swift Bricks' integrated into any new builds.	4.2 Objectives - Objective 2 does not refer to the protection and encouragement of wildlife, flora and fauna. However, planning applications are frequently subject to ecological assessments. The Neighbourhood Plan has adopted the High Weald Housing Design Guide and policy DG10 covers these aspects.
	5.1 Housing & Development	5.1 Housing & Development - On policy HD4 and HD5, the respondent requests the addition of a requirement to incorporate swift bricks or install swift boxes into building designs to support the vulnerable swift population of Battle town	5.1 Housing & Development - We agreed with the protection of the swifts (see above), but HD4 and HD5 are not the relevant policies to address these issues. We believe these would be better suited to policies EN2/EN3 so have revised it accordingly.
	5.3 Environment	5.3 Environment - Policy EN3 ; Respondent states "Conservation of the environment, ecosystems and biodiversity: include specific measures to conserve town dwelling species such as swifts and sparrows in the remit"	5.3 Environment - Policy EN2/3 will be revised accordingly
	7. Community Aspirations	7. Community Aspirations Objective 2 - The respondent wishes to see the addition of specific requirements to include swift boxes/bricks to new build houses.	7. Community Aspirations Objective 2 - The Community Aspirations section 7 (objective 2) addresses this issue.
O-0JR-05	1.Introduction	The respondent has concerns regarding the inclusion of protected Green Space in front of Caldbec House as it will be to the detriment	ESCC are the land owners for this Green Space (GS05) and they made this decision to fence off the whole area and not include any parking spaces.

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		of parking of the neighbours, suggests meeting to work out a compromise.	The reference details to a parking area will be amended in the revised Neighbourhood Plan to accord with ESCC Highways recommendations.
O-9QH-01	<p>1.2 Neighbourhood Area</p> <p>1.3 Planning Policy Context</p> <p>4.1 Vision</p> <p>4.2 Objectives</p> <p>5.1 Housing & Development</p> <p>5.2 Infrastructure</p> <p>5.3 Environment</p>	<p>1.3 Planning Policy Context - Respondent states "The culmination of the various proposals within the area may have "significant environmental effects" even if individual projects do not and this should be considered"</p> <p>4.1 Vision and 4.2 Objectives- The Vision and Objectives should include increase in biodiversity and providing homes for nature.</p> <p>5.1 Housing & Development - Inclusion of homes for wildlife in all buildings should be mandatory - such as swift boxes, bat boxes, ponds, wildflower meadows etc</p> <p>5.2 Infrastructure - Public transport should be the priority rather than encouraging more cars by providing parking spaces</p> <p>5.3 Environment - Although conservation is vitally important, development of new habitats such as ponds and wildflower meadows should be</p>	<p>1.3 Planning Policy Context - Please see 1.3.8 on page 6 and 1.3.9 on page 7 of the Regulation 14 consultation document which refers to the Strategic Environmental Assessment (SEA) and the environmental effects of development. Please see the SEA for further details.</p> <p>4.1 Vision and 4.2 Objectives- Please see reference to Ecology in the Vision Statement, paragraph 4.1.2 on page 26 of the Regulation 14 consultation document, which establishes the high-level positioning of the NP and further details are covered throughout. (e.g. policies EN3/2 and HD4)</p> <p>5.1 Housing & Development - Please see the adopted High Weald Housing Design Guide, section DG10</p> <p>5.2 Infrastructure - Public transport is not within the NP remit but is considered under Community Aspirations in Regulation 14 document</p> <p>5.3 Environment - Please see the adopted High Weald Housing Design Guide, section DG10</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		mandatory for new developments, especially swift, house Martin, swallow etc nest boxes	
O-0LJ-04		<p>Respondent states that Telham Court should be protected, and is concerned that the owner will expand the number of houses on the site.</p> <p>Also that the access to Glengorse (BA31a) is very dangerous and is too near to Blackfriars exit which will increase congestion. "You seem to have picked this site because it is near to the town, but no one would walk as it is too dangerous to do so"</p>	<p>The steering group met Rother Investment owners of Telham Court and they have clarified that they wish to remain private for business purposes. The house and most of the grounds have been included in the Local Heritage Listing and will not be included in the Neighbourhood Plan's proposed development sites</p> <p>ESCC Highways have accepted access to/from Blackfriars site onto A2100 to be manageable. (Planning ref RR/2019/604/P) .Once a planning application for Glengorse (BA31a) has been submitted, it will be subject to the usual review by ESCC Highways.</p> <p>Road safety is outside of the remit of NP, however, BTC are in consultation with Rother and ESCC to resolve the issue. The NP supports these initiatives.</p> <p>We disagree with the comment concerning walking as we are trying to encourage a healthy and ecologically sound lifestyle within the Parish. The AiRS document (page 27) reports that cycling was supported by 44%, and walking by 82% of respondents.</p>
O-0JS-01		<p>The respondent states "We are in favour of the town plan and appreciates the considerable effort involved. It will be good for the town to have a coherent strategy"</p> <p>Respondent is pleased that the development is on the brownfield site at Caldbec Hill (BA36) and not on the "Procession Field".</p>	<p>We thank you for your positive comments.</p> <p>It should be noted that the land at Caldbec House is designated as BA36a and is the area joining</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
			Whatlington Road. BA36a does not include the "Procession Field"
O-OTX-11		<p>1. The Respondent has concern that traffic congestion will increase due to the proposed Glengorse (BA31a) development and the close proximity of the Blackfriars proposed exit onto the A2100. (RR/2019/604/P)</p> <p>2. The respondent has concerns about general road safety on the A2100 in the vicinity of Glengorse and Blackfriars.</p> <p>3. Respondent has concerns about parking in the existing Glengorse roadway</p> <p>4. The respondent fears that once a small area has been developed more houses will follow.</p> <p>5. The respondent is concerned the Glengorse site is not "scored" correctly due to its countryside setting.</p>	<p>1. ESCC Highways have accepted access to/from Blackfriars site onto A2100 to be manageable. (Planning ref RR/2019/604/P) Once a planning application for Glengorse (BA31a) has been submitted, it will be subject to the usual review by ESCC Highways.</p> <p>2. This section of road has an acceptable safety record according to ESCC Highways.</p> <p>3. The parking concerns should be addressed as part of the Civil Parking Enforcement changes, which are scheduled for implementation in 2020.</p> <p>4. The steering group met Rother Investment owners of Telham Court and they have clarified that they wish to remain private for business purposes. The house and most of the grounds have been included in the Local Heritage Listing and will not be included in the Neighbourhood Plan's proposed development sites</p> <p>5. The selection criteria for all sites were applied by AECOM, taking into account the RDC 2013 SHLAA, and (NPPF) national criteria. The steering group then used locally-derived criteria, which were then applied equally to all sites. For further information see PowerPoint presentations on NP website ("Original Site Selection Presentation</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
			2019" and "Final Site Selection Presentation") for information on how decisions were made.
O-OTG-07	5.1 Housing & Development	<p>5.1 Housing & Development</p> <p>1. The respondent suggests we re-examine the latest housing figures passed by RDC and amend our target</p> <p>2. Feels we should increase the housing targets in Glengorse to allow 35 rather than having a small development opposite.</p> <p>3. The respondent suggests Blackfriars figure should be pushed to absorb more rather than small sites.</p> <p>4. On Loose Farm site (BANS118), the respondent feels that the lack of pedestrian footpath is dangerous for 3 or 4 houses; the road needs to be adopted before any new houses are built Thinks if we allow BA31a and NS118 it will encourage "linking" the two sites together</p> <p>The respondent has concerns about scoring of BA23 site ("Land to rear of 26 Hastings Road")</p> <p>The respondent states "In table 3 of the Strategic Environmental Assessment, for objective 11 (reduce emissions of greenhouse gases), all sites are rated as 'amber', this scoring is flawed as surely those sites that are close to the town centre / the rail station are more likely to encourage trips to be made which do not create</p>	<p>5.1 Housing & Development -</p> <p>1. Calculations were based on information available at 01/04/2019</p> <p>2. After review, a figure of up to 20 dwellings is proposed. The Neighbourhood Plan is attempting to restrict the size of developments in line with the communities wishes as expressed in the AiRS survey.</p> <p>3. This is outside the remit of the NP. The number is set by the RDC Core Strategy.</p> <p>4. The Loose Farm Site BANS118 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15.</p> <p>Concerning BA23, please refer to "Preferred site selection (revised 2020)" on the Neighbourhood Plan website. This site was not supported by the land owner and so was withdrawn from the list of sites that were available.</p> <p>These points are addressed in the SEA.</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		<p>greenhouse gases / pollution (eg walk / cycle), compared to those sites that are far from facilities from which people will overwhelmingly be using the car for all journeys. As such some should be scored 'green' if close to the centre, and 'red' for those that are far away"</p> <p>The respondent states "In table 4 of the Strategic Environmental Assessment, the text for site BA NS118 states that 'The capacity of the site is a relatively small figure, therefore should not significantly increase the concentration of vehicle traffic. Listed building adjacent to the site. It is a green field site.', as such it is given a 'green' rating. As noted above this seems to be based on flawed logic, that it is fine to build on locations that are poorly served by public transport / far from public facilities on foot, as long as the number of houses are small in number. Surely it is better to build on sites that are closer to the town centre at slightly higher rates (see comment on Glengorse and Blackfriars in paras above)."</p> <p>The respondent suggests "the 'RAG' scoring of the shortlisted sites should be performed again to see which sites should be shortlisted for the Neighbourhood Plan"</p>	<p>The Loose Farm Site BANS118 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15.</p> <p>The shortlist was created by AECOM and the RAG scoring applied by the Steering Group and therefore there is no reason to review it further.</p>
	Your comments on the Strategic Environmental Assessment	<p>Your comments on the Strategic Environmental Assessment.</p> <p>All the comments relating to this section are a copy of the 5.1 Housing & Development and therefore see above for summary</p>	<p>Your comments on the Strategic Environmental Assessment.</p> <p>All the comments relating to this section are a copy of the 5.1 Housing & Development and therefore see above for the steering group responses</p>
O-OTG-08		The respondent believes the lane to site BANS118 (Loose Farm) couldn't cope with an additional small development of 3 to 4 houses on a large site.	The Loose Farm Site BANS118 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15.

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		Believes the site will mean further blocking of the lane which happens at the Care Home, especially whilst it is being built, despite the site being large and away from the Care Home	
O-0JH-02		<p>The respondent's comments are summarised as follows:</p> <p>1.1 Introduction Allegations of impropriety of individuals on steering group.</p> <p>1.1 Introduction Assertions that they had undeclared vested interests and influenced the strategic direction of the plan.</p> <p>Criticism of the role of the local authority supporting the plan despite above issues.</p> <p>Complainant has contacted "the Ministry of Housing" and considering further legal action.</p> <p>1.2 Neighbourhood Area (this is the same text as 1.1)</p> <p>1.3 - The Planning Policy Context The respondent states "As above"</p> <p>2.1 The Plan Process The respondent states "The process was dishonest"</p> <p>2.2 Community Engagement The respondent states "This was driven by self interest"</p>	<p>1.1 Introduction- As summarised, these matters have been referred to Battle Town Council for consideration using their complaints procedure. The Full Council concluded that the steering group had not acted in a manner which had been influenced by personal interests.</p> <p>1.2 Neighbourhood Area See 1.1 above</p> <p>1.3 - The Planning Policy Context- See 1.1 above</p> <p>2.1 The Plan Process See 1.1 above</p> <p>2.2 Community Engagement - See 1.1 above</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
	Comments on other documents	Comments on other documents - (this is the same text as 1.1)	Comments on other documents- See 1.1 above
O-ANK-01	1.1 Introduction 1.2 Neighbourhood Area	1.1 Introduction- The respondent's comments are summarised as follows: Allegations of a corrupt process that lacked honesty. Criticism of local authority supporting the NP. 1.2 Neighbourhood Area The respondent states "all answers as above"	1.1 Introduction- As summarised, these matters have been referred to Battle Town Council for consideration using their complaints procedure. The Full Council concluded that the steering group had not acted in a manner which had been influenced by personal interests. 1.2 Neighbourhood Area (see 1.1 above)
O-9QB-01	1.2 Neighbourhood Area	The respondent states I completely approve of the Netherfield Preferred Plans by the Battle CP Neighbourhood Plan Steering Group", and quotes "The contingency fallback of also using the Swallow Barn location if required, shows that a great deal of thought has been put into these Plans. Together with the NE01 location on Darvel Down that already has planning permission for 25 dwellings, I feel that there is much to praise on the work of the Steering Group, as relates to Netherfield" The respondent states "As stated, the Steering Group has my full support for their Preferred plans for Netherfield. "	Thank you for your approval of the Neighbourhood Plan in the Netherfield area. Following discussions with RDC planning and ESCC Highways, the steering group have been in contact with developer / landowners regarding NE01 (RR/2019/921/P) and NE05ar (Swallow Barn) having the possibility of a shared access onto the B2096. Thank you. The members of the Steering Group appreciate your support.

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
H-OJR-10		<p>Respondent's name and personal details redacted.</p> <p>The respondent states "Whilst I think it is fair for you to claim the community has been consulted at every stage. It is also true to say that the Steering Group has not faithfully summarised all that has been said in the consultations. It is not simply a matter of only mentioning those matters most mentioned. Strongly felt even if minority views should be recorded. There is no mention of my concerns in the summary"</p> <p>The respondent objects to the process of deriving Government led target figures for numbers of dwellings in the Battle Civil Parish.</p> <p>The respondent is highlighting a need for a rigorous strengthening of the monitoring and review process to oversee the Community Aspirations, particularly beyond 2028</p> <p>The respondent has concerns about the "Foreword" in the plan such as the description of the town/CP. Secondly, the emphasis on history and location rather than development pressure and thirdly, that the market will sell to the highest price the market will bear. The respondent suggests "So a sentence in the foreword saying our priority is to deliver the required housing without seriously harming the character of our settlements or the AONB may help sell the plan to the community who are clearly currently underwhelmed."</p>	<p>Respondent's name and personal details redacted.</p> <p>The respondent makes some very well thought out and constructive comments which the SG will be considering and potentially incorporating in the Plan.</p> <p>A high level analysis was used to gain a holistic view in the early consultations, which led to the formulation of the Regulation 14 consultation document where comments are being analysed and responded to, in detail.</p> <p>This is outside the remit of the Neighbourhood Plan.</p> <p>The steering group acknowledges the concerns raised and have revised the Community Aspirations in particular to strengthen the need for monitoring and review of the plan going forward.</p> <p>The Steering Group agrees that there needs to be a general review of the Foreword and are pleased to include the suggested wording "...our priority is to deliver the required housing without seriously harming the character of our settlements or the AONB..."</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		<p>Vision Statement – The respondent highlights that the vision statement does not refer to “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”</p> <p>Objective 1 - The respondent suggests a change of text of Objective 1: “I could accept the following as a substitute – The community acknowledges it is required to include in the plan the housing numbers set up by the Government and Rother District Council – 475 for Battle and Telham and 48 for Netherfield”. The respondent then suggests other amendments including “All new development in the Parish should reflect not only the architectural style of nearby properties but also take full account of the overall spatial aims of Rother Core Strategy and the aims and needs of the community as a whole. All new development must minimise its impact on outlook and sustainability as well as environmental and spatial considerations by robust assessment of all these factors at the planning application stage”</p> <p>Objective 2 Robust Traffic Mitigation Measures - The respondent comments on</p>	<p>Vision Statement – This SWOT analysis was originally drafted in 2015 (and subsequently elaborated); it represents early Steering Group analysis of the known issues within the Battle CP. Since then many consultations have modified ideas somewhat into what is now the NP. It is interesting to note how over time comments and understandings have improved the Plan detail; however this historic SWOT analysis provided important basic underlying commentary on issues that remain to this day in the Plan.</p> <p>Objective 1 - We support the intention of the respondent’s ideas for modifying the Objectives in Section 4 “Vision and Objectives” of the plan and have amended it accordingly.</p> <p>Objective 2 Robust Traffic Mitigation Measures - Noted</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		<p>Implementing a traffic survey once the link to the Bexhill bypass is completed to ascertain whether traffic coming into Battle Parish is now local or through traffic.</p> <p>The respondent states "Battle's future traffic problems are cumulative and one day will come to a head in High Street unless something is done"</p> <p>The respondent highlights the need for differentiating between local and through traffic. The respondent suggests detailed changes to Objectives 1 and 2 of the Community Aspirations.</p> <p>On Community Aspirations, the respondent states "The old objective 1 would become Objective 2 and be titled Reduce congestion from local traffic especially at peak times and improvements in footways (and all the other objectives would need to be renumbered). The new Objective 1 could be headed Reduce congestion from through traffic" and suggests alternative wording.</p> <p>The respondent makes detailed suggestions about the A21 and its links with other roads</p> <p>Objective 9 - The respondent suggests some amendments to Objective 9 in Section4</p>	<p>On the general matter of traffic congestion within Battle Civil Parish, Battle Town Council have agreed to pursue de-classification of the A2100 after the Queensway/A21 link road is opened</p> <p>Agreed with sentiment. These revisions will be taken into account.</p> <p>Objectives 1 and 2 of Community Aspirations will be revised to take into account some of the suggestions made.</p> <p>Battle Town Council have agreed to pursue de-classification of the A2100 after the Queensway/A21 link road is opened</p> <p>Objective 9 - Objective 9 amended for clarity</p>

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		<p>Housing and Development</p> <p>Policy HD1 Development Boundary The respondent suggests amendments to the text in the policy "Either remove the last sentence (preferred) or take out the "within the built up area" and insert Development boundary."</p> <p>Policy HD2 Site Allocations - The respondent suggests an amendment to the wording.</p> <p>The respondent states "I have very strong objections to the release of either BA36A (it should be that because what is being considered now is only the brown field part of BA36) or BA NS 117. I also object to the proposed amendments to the Development Boundary relating to these sites."</p> <p>The respondent asks "Have any completions, permissions or allowances fallen through the net which would reduce the residual requirement?"</p>	<p>Housing and Development</p> <p>Policy HD1 Development Boundary Policy HD1 has been amended</p> <p>Policy HD2 Site Allocations - All references to BA36 amended to BA36a SG to reflect Preferred Site List V1.6</p> <p>In relation to BA36a (Caldbec House) the steering group cannot find any reason to remove this site from the Neighbourhood Plan. The selection criteria for all sites were applied by AECOM, taking into account the RDC 2013 SHLAA, and (NPPF) national criteria. The steering group then used locally-derived criteria, which were then applied equally to all sites. For further information see PowerPoint presentations on NP website ("Original Site Selection Presentation 2019" and "Final Site Selection Presentation") for information on how decisions were made. The Development Boundary extension currently includes three sites with Planning approval and BA36a</p> <p>Rother District Council have provided the data on the residual requirements up to 1st April 2019 and this has been used in the allocation of sites.</p>

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		<p>The respondent claims that two errors have been made regarding BA36a.</p> <p>Firstly, the respondent considers the number of dwellings proposed by AECOM is excessive.</p> <p>Secondly, with regard to BA36a, the respondent states that “The second error that led to the inclusion of the site for redevelopment is that you believed the owner wanted or at any rate would be prepared to redevelop the brown field part of the site”</p> <p>The respondent objects to preferred site BANS117 (“Cherry Garden Allotments”) and describes in detail visual amenity and access concerns.</p> <p>Policy HD 3 Housing Mix - The respondent has concerns about the housing mix and precision of development boundary and the name Battle</p> <p>Policy HD6 Local Connection - The respondent states “The policy is a little muddled and it would be at least advisable to sort out inconsistencies before the plan proceeds. As with all policies terminology should be the same all the way through. For a start say Battle Parish all the way through. Close relative in category 3 should not be changed to family member in the next sentence. Statements made should be accurate”</p>	<p>On the respondent’s first point – In consultation with RDC it has been agreed that this site will be designated for <u>up to 9</u> dwellings and it will be up to the developer to propose their numbers in any future planning application.</p> <p>The respondent in believing errors were made cites the Procession Field which although included in the original SHLAA site BA36 was not part of the Regulation 14 consultation for BA36a.</p> <p>On the respondent’s second point – The steering group do not agree with the comments made.</p> <p>The Cherry Gardens site (BANS117) will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15.</p> <p>Policy HD 3 Housing Mix - The steering group believes that policy HD3 is sound. We note your comment concerning the name ‘Battle’ and this will be amended to read Battle Civil Parish.</p> <p>Policy HD6 Local Connection - The steering group acknowledges the comments of the respondent, however there is not sufficient evidence to include some of the detail that is suggested.</p> <p>Categories 1,2,3 have been revised to reflect Rother Housing Allocation policy, local connection criteria</p>

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		<p>The respondent then states “DG1 finishes by saying the legal agreement is to ensure nomination rights and that affordable housing will be affordable. If you decide to carry on with your three categories I suggest you look at the Glossary of Terms in Appendix 3 of Rother’s plan before you do so. The idea seems to be in some cases eg discounted market sales housing those provisions should be kept in place to ensure housing remains at a discount for future eligible households. In any event you need to change “The applicant or their partner” at the start of each category with - The first and subsequent occupants or their partners”</p> <p>Policy IN1 Traffic Mitigation - The respondent suggests the following alternative wording: <i>“Applications for all new development must provide a traffic impact assessment and demonstrate how the development will improve, or at least maintain, traffic calming measures. Applications must also show what additional measures will be taken to reduce the impact of traffic movements generated by the new development.”</i></p> <p>Implementation, Monitoring and Review - 6.1.3 - The respondent was very disappointed by the approach taken in monitoring of the section and indicates that the Town Council needs to be far more hands-on. The respondent provides ideas about key performance indicators that will need to be monitored to judge effective application of the planning process.</p> <p>Concluding remarks - The respondent states “I would like it clear that although I have serious concerns about the scale of housing allocations for Battle</p>	<p>Policy IN1 Traffic Mitigation – Policy amended to reflect these suggestions as well as that of ESCC.</p> <p>Implementation, Monitoring and Review - Battle Town Council, having adopted the plan, needs to develop a robust monitoring process with specific key performance indicators for the newly appointed monitoring sub-committee post referendum.</p> <p>Concluding remarks - Responses of the steering group are shown as below :-</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		<p>Parish up to 2028 which I have already explained and which I shall continue to make known. I accept that the housing requirement cannot effectively be challenged in this Plan but that does not mean we all have to pretend we welcome it or that all of it is required to meet local needs"</p> <p>There are only (at the moment) 3 things which will cause me to vote against:</p> <p>i) Objective 1</p> <p>ii) Preferred Site 36a</p> <p>iii) Preferred Site BA NS 117</p> <p>The respondent makes two suggestions on Community Aspirations to improve the plan</p> <p>The respondent's first suggestion is the simple device of classifying traffic into local and through traffic and introducing some actions to tackle through traffic</p> <p>The respondent's second suggestion concerns the monitoring and review if the plan is adopted</p>	<p>Point i) We support the intention of the respondent's ideas for modifying the Objectives in Section 4 "Vision and Objectives" of the plan</p> <p>Point ii) In consultation with RDC it has been agreed that this site will be designated for <u>up to 9</u> dwellings and it will be up to the developer to propose their numbers in any future planning application</p> <p>Point iii) The Cherry Gardens site (BANS117) will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15.</p> <p>A number of suggestions for improving the Community Aspirations section have been agreed and will be included</p> <p>Whilst this is not in the remit of the NP, Battle Town Council have agreed to pursue de-classification of the A2100 after the Queensway/A21 link road is opened</p> <p>Battle Town Council, having adopted the plan, needs to develop a robust monitoring process post referendum</p>

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			with specific key performance indicators. As described in Section 6, Battle Town Council will appoint a monitoring sub-committee
H-9QE-01		<p>BSNE06 White House Farm BSNE05 Swallow Barn Darvel Down RR/2019/921/P Darvel Down RR/2017/2308/P</p> <p>The respondent states “I have no overall objection to some new houses being built in the Darvel Down area” However the respondent does have concerns regarding the total number of houses over the three sites, saying “Darvel Down has approximately 120 houses, another possible 68 would increase the original number by approx 50%”</p> <p>Clean/Waste water and Electricity - The respondent is concerned about power outages, which also affects the water pump and sewage services for some houses in Netherfield.</p> <p>The respondent has concerns about access via Darvel Down for RR/2019/921/P and RR/2017/2308/P. The respondent quotes “White House Farm <u>BSNE06</u>, Swallow Barn <u>BSNE05</u> - I very much hope that if houses were to be built on these sites access would be directly onto the “main road system” B2096 <u>not</u> via Darvel Down”</p>	<p>There are 2 sites being put forward by the Neighbourhood Plan, NENS102 (White House Poultry Farm) and NENS05ar (Swallow Barn) A third site NE01 already has planning permission granted by RDC (RR/2019/921/P and RR/2017/2308/P)</p> <p>The Neighbourhood Plan currently being consulted will only be for up to 23 dwellings (not 68 as alleged) but the site with planning permission is for 25 dwellings.</p> <p>Clean/Waste water and Electricity - Whilst this is not within the remit of the Neighbourhood Plan the concerns about utility services will be dealt with at planning application stage. Nevertheless these matters are noted in the Community Aspirations</p> <p>Following discussions with RDC planning and ESCC Highways, the steering group have been in contact with developer / landowners regarding NE01 (RR/2019/921/P) and NE05ar (Swallow Barn) having the possibility of a shared access onto the B2096</p>

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		Community Aspirations - The respondent states "If/when new houses are built in this area could we have a much better bus service. The present service, Monday to Friday only, is <u>very inadequate</u> No bus Saturday, Sunday and Bank Holidays. It is impossible to get to any employment without a car. "	Community Aspirations - Public transport is not within NP remit but is considered under Community Aspirations in Regulation 14 document.
H-OLG-01		The respondent has concerns about lack of pavements, speeding vehicles along the roads especially after new developments at Netherfield and Lilybank are finished. The respondent also states "I propose either a pavement be constructed, and in addition speed humps, which might act as a deterrent or slow traffic down "	Pavements and traffic issues are not within the remit of the Neighbourhood Plan. However, with the exception of one house, the Lillybank Farm development (RR/2017/1136/P) will access onto the A2100. For Netherfield, the lack of footways has been noted in Community Aspirations.
H-OTQ-03	5.3 Environment	5.3 Environment - The respondent states "Improve our public transport system to cut pollution and congestion" The respondent would like to see a better bus service. Has suggested a bus route/service based upon the 95 service that would benefit the residents.	5.3 Environment - Improve our public transport system to cut pollution and congestion - We thank the respondent for the observations and suggestions. However, public transport is not within the Neighbourhood Plan remit but is considered under Community Aspirations in Regulation 14 document.
H-OEY-02	5.1 Housing & Development	5.1 Housing & Development - The respondent states "I hope that currently empty properties will be gradually occupied; and that development will be as controlled as possible I trust our elected representatives"	5.1 Housing & Development- Whilst we appreciate this comment, the use of empty properties is not within the remit of the Neighbourhood Plan. Any planning permissions put forward after the plan is made will still go through the planning process conducted by RDC.

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
H-9QB-02	5.1 Housing & Development	5.1 Housing & Development- The respondent believes that the two suggested sites should access on to B2096 and not into Darvel Down	5.1 Housing & Development- Following discussions with RDC planning and ESCC Highways, the steering group have been in contact with developer / landowners regarding NE01 (RR/2019/921/P) and NE05ar (Swallow Barn) having the possibility of a shared access onto the B2096
H-OTX-12	5.1 Housing and Development	5.1 Housing and Development - The respondent states "BA31a Glengorse site, I strongly opposed to this project for the following reasons:" 1. Suggests that the site should have been "double scored" as compared with Loose Farm site 2. The small road leading to the site, cannot take either the vehicles and materials needed to build the proposed houses, or the subsequent potential 40 cars which would live there. 3. Concerns about the proximity to the Blackfriars site and dangerous access onto the Hastings Road.	5.1 Housing and Development (individual points answered below) 1. The selection criteria for all sites were applied by AECOM, taking into account the RDC 2013 SHLAA, and (NPPF) national criteria. The steering group then used locally-derived criteria, which were then applied equally to all sites. For further information see PowerPoint presentations on NP website ("Original Site Selection Presentation 2019" and "Final Site Selection Presentation") for information on how decisions were made. 2. This is not within the remit of the Neighbourhood Plan, however, vehicles and materials access will be dealt with in any future planning application by RDC. 3. ESCC Highways have accepted access to/from Blackfriars site onto A2100 to be manageable. (Planning ref RR/2019/604/P) Once a planning application for Glengorse (BA31a) has been submitted, it will be subject to the usual review by ESCC Highways

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		4. Concerns over teenager safety, and states that "It is already incredibly dangerous for them to be crossing by the Glengorse turning, and adding extra traffic along Glengorse would make the matter much worse"	4. Whilst we appreciate your concerns, road safety is outside of the remit of Neighbourhood plan, but our understanding is that the ESCC Highways safety audit does not indicate a high risk. However, BTC are in consultation with Rother and ESCC to resolve the issue of a crossing on Battle Hill and the Neighbourhood Plan supports these initiatives.
H-OJR-06	5.3 Environment	5.3 Environment The respondent has concerns about the removal of parking and does not approve of the Green Space listing taking away parking spaces the residents have used for many years. The respondent states, "I sincerely hope they (<i>sic</i> RDC and BTC) possess the will to find the way through this dilemma that is beneficial and acceptable to everyone"	5.3 Environment We believe the respondent is referring to car parking on the Local Green Space (GS05) on Caldbec Hill. ESCC are the land owners for this Green Space (GS05) and they made this decision to fence off the whole area and not include any parking spaces. The reference details to a parking area will be amended in the revised Neighbourhood Plan to accord with ESCC Highways recommendations
H-OTX-13	1. Introduction & background 5.1 Housing & Development 5.3 Environment	1. The respondent suggests that the site (BA31 Glengorse) should have been "double scored" as compared with Loose Farm site (118). Also concerns about proximity of a "beautiful stately home" and it not being a brown field site. 2. The respondent requests that Telham Court, the stables and gardens are included and protected on Battles Heritage Listing	1. The selection criteria for all sites were applied by AECOM, taking into account the RDC 2013 SHLAA, and (NPPF) national criteria. The steering group then used locally-derived criteria, which were then applied equally to all sites. For further information see PowerPoint presentations on NP website ("Original Site Selection Presentation 2019" and "Final Site Selection Presentation") for information on how decisions were made. 2. The house and most of the grounds have been included in the Local Heritage Listing and the land (with the exception of BA31a) will not be included in the updated Neighbourhood Plan's proposed development sites.

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		<p>3. The respondent comments that Glengorse house and the grounds should be protected for rare wildlife.</p> <p>4. The respondent is concerned about the exit onto the Hastings Road from Glengorse and this will be made worse once Blackfriars is developed. It will make access out of both sites difficult and dangerous and will lead to more traffic congestion.</p> <p>5. The respondent considers it unfair to expect Glengorse and Telham residents to bear the brunt and the volume of building that is planned for this side of the town. Additionally states "we cannot accept any further developments that exceed 4 or 5 houses"</p> <p>6. The respondent has concerns over road safety issues.</p> <p>7. The respondent is concerned that the roads in Glengorse are too narrow for ease of vehicle movement. Also mentions parking by rail travellers in Glengorse and the difficulties this causes.</p>	<p>3. See comment 2 above.</p> <p>4. ESCC Highways have accepted access to/from Blackfriars site onto A2100 to be manageable. (Planning ref RR/2019/604/P) Once a planning application for Glengorse (BA31a) has been submitted, it will be subject to the usual review by ESCC Highways.</p> <p>5. The AECOM report originally proposed 70 dwellings at Glengorse on a larger site (BA31 and BA23). The steering group used locally-derived criteria, which were then applied equally to all the sites and as a result this was reduced to a single site (BA31a), which will be designated for up to 20 dwellings.</p> <p>6. Whilst we acknowledge your concerns, road safety issues are outside of the remit of the Neighbourhood Plan. However, our understanding is that the ESCC Highways safety audit does not indicate a high risk in this area.</p> <p>7. This is not within the remit of the Neighbourhood Plan, however, vehicles access will be dealt with in any future planning application by RDC. With regards to commuters parking this should cease to be an issue once Civil Parking Enforcement is in force.</p>

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		<p>8. The respondent states "if you allow Glengorse to be developed at this stage, then the original housing figure of 70 residencies will be allowed to go through at a later date, possibly if and when the government pushes through more housing numbers"</p> <p>9. The respondent states "The Neighbourhood Plan is for local people to determine whether proposed sites are suitable with their local knowledge, so please do not ignore us"</p>	<p>8. The AECOM report originally proposed 70 dwellings at Glengorse on a larger site (BA31 and BA23). The steering group used locally-derived criteria, which were then applied equally to all the sites and as a result this was reduced to a single site (BA31a), which will be designated for up to 20 dwellings. Also please note that the house and most of the grounds have been included in the Local Heritage Listing and will not be included in the Neighbourhood Plan's proposed development sites.</p> <p>9. We believe we have had sufficient engagement with the community via public consultations, drop-in sessions, Parish Assemblies, Parish newsletters, newspapers, and social media. The selection criteria for all sites were applied by AECOM, taking into account the RDC 2013 SHLAA, and (NPPF) national criteria. The steering group then used locally-derived criteria, which were then applied equally to all sites. For further information see PowerPoint presentations on NP website ("Original Site Selection Presentation 2019" and "Final Site Selection Presentation") for information on how decisions were made.</p>
H-0FP-01	5.1 Housing & Development	5.1 Housing & Development - The respondent states "The proposed development of housing adjacent to Cherry Tree `Gardens allotments would be damaging to the access lane from Mount Street. Mount Street is already too overwhelmed by traffic"	5.1 Housing & Development- The Cherry Gardens site (BANS117) will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15.
H-9PR-01	5.2 Infrastructure	5.2 Infrastructure - The respondent is concerned about the increase in traffic, the lack	5.2 Infrastructure - We appreciate your concerns, however, these

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		<p>been considered an issue"</p> <p>The respondent is concerned about the removal of trees on site BA36a Caldbec Hill, the impact on parking, and the disruption caused by development.</p>	<p>area and not include any parking spaces. The reference details to a parking area will be amended in the revised Neighbourhood Plan to accord with ESCC Highways recommendations</p> <p>A figure of <u>up to 9</u> dwellings on site BA36a is now in the Neighbourhood Plan. Concerns about tree removal and parking on the site will be dealt with by RDC during any future planning application.</p>
H-9QB-04	5.1 Housing & Development	<p>5.1 Housing & Development -</p> <p>The respondent states "I agree with the preferred sites of Swallow Barn and White House Poultry Farm in Netherfield but exit onto the B2096 is by far best option. Much safer the sending 50-100 vehicles through estate and past school"</p>	<p>5.1 Housing & Development -</p> <p>Following discussions with RDC planning and ESCC Highways, the steering group have been in contact with developer / landowners regarding NE01 (RR/2019/921/P) and NE05ar (Swallow Barn) having the possibility of a shared access onto the B2096</p>
H-9QB-05	5.1 Housing & Development	<p>5.1 Housing & Development –</p> <p>The respondent states "New housing needs to be discreet in rural villages if they have to be built. The proposed plan in Netherfield seems to be the most unobtrusive"</p>	<p>5.1 Housing & Development -</p> <p>Thank you for your comments on our Neighbourhood Plan sites in Netherfield.</p>
H-OEG-02	5.1 Housing & Development	<p>5.1 Housing & Development-</p> <p>The respondent has concerns about access lane to BANS117 not being adequate to accommodate more traffic plus congestion on the main road and a potentially dangerous junction.</p>	<p>5.1 Housing & Development-</p> <p>The Cherry Gardens site (BANS117) will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15.</p> <p>{This response and that of H-OEG-03 were received from two individuals within the same household, and have been recorded separately as requested by the respondents.}</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
H-OEG-03	5.1 Housing & Development	5.1 Housing & Development- The respondent has concerns about access lane to BANS117 not being adequate to accommodate more traffic plus congestion on the main road and a potentially dangerous junction.	5.1 Housing & Development- The Cherry Gardens site (BANS117) will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15. {This response and that of H-OEG-02 were received from two individuals within the same household, and have been recorded separately as requested by the respondents.}
H-OEG-04	5.1 Housing and Development 5.2 Infrastructure 5.3 Environment Other comment The Statutory Environmental Assessment Proposed Preferred Site List	5.1 Housing and Development 5.2 Infrastructure 5.3 Environment Other comment The Statutory Environmental Assessment Proposed Preferred Site List The respondent states "BANS117 field beyond Cherry Gardens NOT suitable for development because of ACCESS problems", and "It harbours a variety of plant and animal life." The respondent states "BA11 Harrier Lane to Starr's Green: on behalf of people living around, please leave as many green spaces and trees as possible, as this area is much used and enjoyed by people nearby. New development must include play area, and ideally another primary school to relieve traffic in the High St. before and after school"	5.1 Housing and Development 5.2 Infrastructure 5.3 Environment Other comment The Statutory Environmental Assessment Proposed Preferred Site List The Cherry Gardens site (BANS117) will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15. For site BA11 (Blackfriars), which has outline Planning Permission (RR/2019/604/P) there is already acknowledgement of the need for green spaces and play areas within the overall site. Schools are outside of the NP remit. However, the ESCC Director of Childrens Services states that " <i>Our latest forecasts indicate there should be sufficient early years, primary and secondary school places in both Battle and Netherfield over the Neighbourhood Plan Period to meet the predicted demand for places</i> ".

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		The respondent states "Proposed preferred site for building: land north of Virgins Lane, which was an earlier proposals"	It is unclear which site the respondent is referring to as the Regulation 14 document does not contain any sites matching this description.
H-ODP-01	5.3 Environment	5.3 Environment- The respondent states "...we have been involved in the Blackfriars (now neighbourhood) Plan for 30 years. A constant and costly problem has been the necessity of proper drainage (main drainage) for the houses to be built close to the dwellings in Kingsdale Close. Often it has not been a major consideration until we point it out, and then the cost de-rails the scheme. Please ensure the costs are factored in from the beginning this time"	5.3 Environment- Whilst we appreciate your concerns about drainage design, this is not within remit of Neighbourhood Plan and will be a planning consideration for RDC in respect of the Blackfriars site (RR/2019/604/P) We would further point out that the factoring of costs is again a planning matter and not within the Neighbourhood Plan remit.
H-OHD-02	5.1 Housing & Development 5.2 Infrastructure 5.3 Environment 5.4 Economy and Tourism	5.1 Housing & Development 5.2 Infrastructure 5.3 Environment 5.4 Economy and Tourism The respondent whilst accepting the need for more housing although a controversial subject as are environmental issues, but has concerns about: 1. Battle losing its identity 2. Building on green belts 3. More roads. 4. Pressure put on services such as schools and medical facilities.	5.1 Housing & Development 5.2 Infrastructure 5.3 Environment 5.4 Economy and Tourism- 1. The steering group does not believe that Battle will lose its identity as following the adoption of the Neighbourhood Plan, future planning applications should comply with both the Battle Design Guidelines and High Weald Housing Design Guide. 2. The Neighbourhood Plan includes Green Gaps and Local Green Spaces to be designated 3. The construction of roads both on and off sites is not within the remit of the Neighbourhood Plan 4. Schools are outside of the NP remit. However, the

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		<p>The respondent states "We do hope that Battle Neighbourhood Plan will be able to help decide where the housing should be put and that it is environmentally friendly. Green spaces are needed as this town depends heavily on tourists too survive"</p> <p>The respondent states "Whatever decisions are made, we wish all concerned in making those decisions the very best of luck"</p>	<p>ESCC Director of Childrens Services states that <i>"Our latest forecasts indicate there should be sufficient early years, primary and secondary school places in both Battle and Netherfield over the Neighbourhood Plan Period to meet the predicted demand for places"</i>. GP Surgery provision is outside the NP remit; however, residents' wishes are included in the Community Aspirations. Both of the surgeries in Battle have informed us that they currently have the capacity to take on extra patients over the Neighbourhood Plan period</p> <p>A large selection of Local Green Spaces are already included within the Neighbourhood Plan because we recognise the importance of the very green public realm for both local residents and tourists.</p> <p>We thank you for your comments</p>
H-9QB-06	5.1 Housing & Development	<p>5.1 Housing & Development-</p> <p>The respondent states "The sites selected for Netherfield are quite discreet, which is good. They also blend into a cohesive shape with the existing buildings in the village. AONB land should ideally not be built on, but if it really does have to be, then any development should be as discreet as possible"</p>	<p>5.1 Housing & Development-</p> <p>We welcome your positive comments concerning the proposed sites in Netherfield.</p> <p>You will be pleased to know that all planning applications after the adoption of the Neighbourhood Plan should comply with the Battle Design Guidelines and High Weald Housing Design Guide.</p> <p>Finally please note the whole of the parish is within the AONB.</p>
H-9QB-07	5.1 Housing & Development	<p>5.1 Housing & Development -The respondent states "At least they've found somewhere that's not too visible from a wide area"</p>	<p>5.1 Housing & Development-</p> <p>Based on the address of the respondent we believe</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
			<p>this refers to Netherfield sites.</p> <p>We thank you for this comment.</p> <p>You will be pleased to know that all planning applications after the adoption of the Neighbourhood Plan should comply with the Battle CP Design Guidelines and especially the High Weald Housing Design Guide which addresses the landscape context (Policy DG1)</p>
H-OTX-14	5.1 Housing & Development	<p>5.1 Housing & Development -</p> <p>The respondent asserts Glengorse (BA31a) should have double points scored for the Heritage Listing.</p> <p>The respondent states “The width of the access roads in Glengorse are too narrow for cars and lorries to pass each other easily and is well under the distance recommended by the Highways Agency”</p> <p>The respondent states “The only exit from Glengorse onto the Hastings Road will be less than 200 metres from the major Blackfriars Site exit onto Hastings Road. It is also on a bend which, with the increase congestion, will make exiting for both cars and pedestrians much more difficult. Cars often go well above the speed limit and crossing as a pedestrian is extremely dangerous”</p>	<p>5.1 Housing & Development-</p> <p>Double points were applied for Heritage and Environment for this site. For further information see PowerPoint presentations on NP website (“Original Site Selection Presentation 2019” and “Final Site Selection Presentation”) for information on how decisions were made.</p> <p>This is not within the remit of the Neighbourhood Plan. However, road access issues will be dealt with in any future planning application for Glengorse (BA31a) by RDC and ESCC Highways.</p> <p>ESCC Highways have accepted access to/from Blackfriars site onto A2100 to be manageable. (Planning ref RR/2019/604/P)</p> <p>Road safety is outside of the remit of Neighbourhood Plan.</p> <p>However, our understanding is that the ESCC Highways safety audit does not indicate a high risk in this area.</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		The respondent suggests that the Blackfriars site takes the extra 20 houses rather than Glengorse.	We do not believe this is feasible as RDC are currently proposing to develop the Blackfriars site up to a maximum of 220 dwellings, which is the figure included in the Neighbourhood Plan.
H-0TX-15	5.1 Housing & Development	<p>The respondent states "Re site BA31a - it is an area in the countryside and should have been double scored because of this - surrounded by fields.</p> <p>The junction of Glengorse and Hastings Road is already very dangerous, lack of pavement, a sharp bend and traffic going too fast with road accidents including a fatality opposite the Esso garage recently.</p> <p>The access road to this site is too small and narrow, under the distance recommended by the Highways Agency.</p> <p>With the large development planned at the Blackfriars site it would make more sense to add 20 houses to this site"</p>	<p>Double points were applied for Environment for this site. For further information see PowerPoint presentations on NP website ("Original Site Selection Presentation 2019" and "Final Site Selection Presentation") for information on how decisions were made.</p> <p>ESCC Highways have accepted access to/from Blackfriars site onto A2100 to be manageable. (Planning ref RR/2019/604/P) Road safety is outside of the remit of Neighbourhood Plan. However, our understanding is that the ESCC Highways safety audit does not indicate a high risk in this area.</p> <p>This is not within the remit of the Neighbourhood Plan. However, road access issues will be dealt with in any future planning application for Glengorse (BA31a) by RDC and ESCC Highways</p> <p>We do not believe this is feasible as RDC are currently proposing to develop the Blackfriars site up to a maximum of 220 dwellings, which is the figure included in the Neighbourhood Plan</p>
H-9QF-01	(no headings)	The respondent states "With the possibility of 100 + more people and 100 + more cars in the village will Netherfield qualify for pavements on Netherfield Road and the B2096!"	We understand your concerns, however, this is not within the remit of the Neighbourhood Plan and is the responsibility of ESCC Highways but their safety audits

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		<p>The respondent is concerned with excess surface water from Old Tower Walk and the adjoining field, which has conditional outline planning for 25 houses.</p> <p>The respondent states "Some fence panels on Darvel Down have become in great need of repair. This has been the case for months - not just from the recent storms. The estate is looking very run down"</p>	<p>to date have not raised pavement concerns. Additionally the requirement for footway provision in the village is listed in Community Aspirations.</p> <p>Drainage issues will be addressed during the development of site NE01 under the planning applications RR/2017/2308/P and RR/2019/291/P.</p> <p>This is not a Neighbourhood Plan issue. We suggest you raise this with your local Battle Town Councillors and/or your Rother District Councillors.</p>
H-OJR-09	(no headings)	<p>Comment on Battle Neighbourhood Plan Green Spaces -</p> <p>BAGS27 "Caldbec Hill Arboretum, the respondent states "This is my privately owned field, which I have chosen to plant in some areas with trees for my own pleasure. It has public footpaths through the field but has footpath access only over my driveway from Caldbeck Hill"</p> <p>The respondent states "Please could the plan stop using this title which has connotations for those who don't know the site. The field has been colloquially referred to as the footway field for many decades, if not centuries.</p> <p>I wrote during the previous consultation period saying I do not want the field to be designated as an official green space as this would imply restrictions over my personal property and I write opposing this again:"</p>	<p>Comment on Battle Neighbourhood Plan Green Spaces -</p> <p>It is noted that Footpath Battle 28a provides Public Right of Way access from Whatlington Road to the Footpaths across this field.</p> <p>It is not possible to change the title at this stage due to multiple uses throughout all the NP documents. Using "footway" would be confusing, since it is a technical term used throughout.)</p> <p>The Neighbourhood Plan steering group responded to this request, deleting BA GS27 from the current list used in this consultation (see REG 14 document "Local Green Spaces - analysis</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
			v7.4, Section 1.5 and ANNEXE 6, page 33 where BA GS27 is "greyed out". The Local Green Spaces v7.4 will be edited.
H-OJH-04	5.3 Environment	<p>5.3 Environment -</p> <p>The respondent states "I notice the pledge to maintain bio-diversity via green spaces and trees but I feel there is a strong requirement to improve and increase it"</p> <p>The respondent states "Please can consideration be given to supplying toilets at the Abbey end of town"</p>	<p>5.3 Environment -</p> <p>The Local Green Space analysis has worked hard to maintain biodiversity within the Civil Parish. It should be noted that the Rother Local Plan includes requirements for tree planting on development sites. Any improvements to the biodiversity policy EN3 will be subject to the ongoing monitoring and review process post referendum.</p> <p>Unfortunately public toilets are not within the NP remit, but will be added to the Community Aspirations.</p>
H-OLG-02	<p>4.2 Objectives</p> <p>5.1 Housing & Development</p> <p>5.2 Infrastructure</p> <p>5.3 Environment</p> <p>7 Community Aspirations</p>	<p>4.2 Objectives</p> <p>5.1 Housing & Development</p> <p>5.2 Infrastructure</p> <p>5.3 Environment</p> <p>7 Community Aspirations</p> <p>The respondent states "I can't see any reference to the affect of proposed increase in housing on existing medical / social care facilities in the town"</p>	<p>4.2 Objectives</p> <p>5.1 Housing & Development</p> <p>5.2 Infrastructure</p> <p>5.3 Environment</p> <p>7 Community Aspirations</p> <p>Whilst we appreciate your concerns, GP Surgery provision is outside the NP remit; however, residents' wishes are included in the Community Aspirations. Both of the surgeries in Battle have informed us that they currently have the capacity to take on extra patients over the Neighbourhood Plan period.</p>

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		<p>The respondent states "No mention of increased traffic along Netherfield Hill in view of proposed housing developments at Netherfield, Battle & Telham"</p> <p>The respondent states "Objective 1 - improve footways. Nothing included about a footway along Netherfield Hill, especially in view of the proposed new housing at Lilybank Farm and the two in the environs of Netherfield Village."</p> <p>The respondent states "5.3 Environment Re BA GS 01 - The Netherfield Hill allotments are not off Beech Close they are at the end of Netherfield Hill cottages"</p>	<p>This is not within the remit of the Neighbourhood Plan, but is a matter for ESCC Highways to deal with at the time of planning applications.</p> <p>To clarify, this is Objective 1 of Community Aspirations. This is not within the remit of the Neighbourhood Plan. However, we do not consider there will be high footfall between Lillybank Farm and Netherfield Hill because there is only one dwelling which will have access via Wattles Wish to Netherfield Hill. All remaining dwellings will have access onto the A2100.</p> <p>Thank you, we agree with your comment and the Local Green Spaces document will be amended accordingly to show the correct location (see LGS v7.5)</p>
H-OEG-05	5.1 Housing & Development	<p>5.1 Housing & Development</p> <p>BANS117 "Land to the NE of Cedarwood Care Home"-</p> <p>The respondent states "I write to strongly object to any proposal of development on the above site for the following reasons" :</p> <ol style="list-style-type: none"> 1. Loss of wildlife 2. Impact on historic and scenically important sites 3. Additional traffic using the recently tarmaced lane from Mount Street down to Abbey View holiday cottages. 4. There is a footpath crossing the Lane from the car park to Cherry Orchards* Communal Space and allotments and there have already been near accidents with vehicles driving too fast through this right of way for pedestrians 5. At present, there is no light, air or noise pollution and the wildlife thrives in these conditions. 	<p>5.1 Housing & Development</p> <p>The respondent quotes BANS117 "Land to the NE of Cedarwood Care Home", however all the comments made by the respondent in relation to BANS117 relate to Cherry Gardens site.</p> <p>The Cherry Gardens site (BANS117) will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15.</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
H-9QQ-01	(no headings)	<p>The respondent highlights the following issues and states:</p> <p>“Worried about car parking – Netherfield needs a public car park plus any new housing needs a space per bedroom + one for a guest (as rural village cars are essential)”</p> <p>“Too many houses has potential to cause more flooding, drains need to be cleared more regularly”</p> <p>“Ok walking about the village in good weather but with young children or more mature people <u>NEED</u> to use their cars. Not practicable to walk”</p> <p>“Worried about sewage overflow especially from septic tanks. Can all the residents in Netherfield be put on main drains.”</p> <p>“There are no decent areas to walk. The main roads out of the village are dangerous because of the amount of traffic that passes through the village. Which very often <u>exceeds</u> the 30 mile limit. <u>We need pavements.</u>”</p>	<p>A public car park will be added to the Community Aspirations .</p> <p>With regards to car parking spaces per house, please refer to policy IN3 in the Neighbourhood Plan for the current allocation. No figure is prescribed because there is not sufficient evidence to do so. The ESCC standards need to be used.</p> <p>The clearing of drains is an ESCC Highways matter and not a Neighbourhood Plan issue.</p> <p>Although we note your concern, personal mobility is not within the remit of the Neighbourhood Plan.</p> <p>Septic tanks are the responsibility of the individual landholders. With regards to Netherfield being put onto main drains, this is not within the remit of the Neighbourhood Plan.</p> <p>Pavements and speed limits are outside of the remit of Neighbourhood Plan.</p> <p>The requirement for pavements provision in the village is listed in Community Aspirations.</p>
H-ANK-09	1.2 Neighbourhood area 1.3 The planning policy context 5.1 Housing &	1.2 Neighbourhood area 1.3 The planning policy context 5.1 Housing & Development 5.3 Environment 5.4 Economy & Tourism	1.2 Neighbourhood area 1.3 The planning policy context 5.1 Housing & Development 5.3 Environment 5.4 Economy & Tourism

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
	Development 5.3 Environment 5.4 Economy & Tourism	<p>The respondent states "Battle town is now in a very fragile position. It is gradually being spoilt by careless alterations or development"</p> <p>The respondent goes on to comment about:</p> <ul style="list-style-type: none"> - Cherry Gardens - Blackfriars - Building properties carelessly and indiscriminately. - Housing above shops - Development of empty buildings - Old properties and gardens could be open to the public 	<p>We thank you for your comments and can respond as follows:-</p> <ul style="list-style-type: none"> - The Cherry Gardens site (BANS117) will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15. - With regards to the Blackfriars site (BA11) Rother District Council have already granted outline planning permission (RR/2019/604/P). - All planning applications should comply with the Battle Design Guidelines and High Weald Housing Design Guide which addresses some of the other points made. - In relation to housing above shops and development of empty buildings this concept is recognised in recent planning applications submitted to Rother District Council for such accommodation. - The opening of old properties and gardens is not within the remit of the Neighbourhood Plan.
H-ANK-10	(no headings)	<p>The respondent states "Speed bumps would be useful Netherfield Rd top and bottom, I think this would deter speeders onto the main road B2096"</p> <p>"In addition, a car park opp. the school currently grass, as an "in and out" and parking would help"</p>	<p>Traffic calming measures are the responsibility of ESCC Highways but the concept of 20mph zones will be added to the Community Aspirations for Netherfield. Traffic calming measures (including 20mph zones) for Netherfield to be included in the Community Aspirations.</p> <p>The grass area mentioned is proposed as a local green space (NEGS05), subject to approval by an independent planning examiner.</p>

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			However, parking in Netherfield is included in the Community Aspirations.
H-9QE-03	(no headings)	<p>The respondent states:</p> <p>"1 Double Yellow lining – were do all us residents park our cars?</p> <p>2 Not safe for children to access play park to much traffic, Traffic calming would need to be put in place for the safety of the children</p> <p>3. Public Transport, there is not enough transport for the resedents out of the village.</p> <p>4. The school is to small to take any more children</p> <p>5. You have not consided us resedents in Darvel Down!!!"</p>	<p>1. Double Yellow lining is not within the remit of the Neighbourhood Plan and is a matter for ESCC Highways. The traffic regulation orders and yellow lines are conditional requirements of planning applications.</p> <p>2. Whilst we appreciate your concern for the safety of children, traffic calming measures are the responsibility of ESCC Highways but the concept of 20mph zones will be added to the Community Aspirations for Netherfield.</p> <p>3. Public transport is not within the Neighbourhood Plan remit but is considered under Community Aspirations in Regulation 14 document</p> <p>4. Schools are outside of the NP remit. However, the ESCC Director of Childrens Services states that <i>"Our latest forecasts indicate there should be sufficient early years, primary and secondary school places in both Battle and Netherfield over the Neighbourhood Plan Period to meet the predicted demand for places"</i></p> <p>5. We do not agree with the respondent's views. We believe we have had sufficient engagement with the community via public consultations, drop-in sessions, Parish Assemblies, Parish newsletters, newspapers, and social media.</p>

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H-OEG-06	5.1 Housing & Development 5.2 Infrastructure 5.3 Environment 5.4 Economy & Tourism	<p>5.1 Housing & Development 5.2 Infrastructure 5.3 Environment 5.4 Economy & Tourism</p> <p>Re Plan Ref NS117 the respondent states: "Whilst I do understand and appreciate the great need for extra housing in and around the Battle area – BUT – this site has many negative aspects"</p> <p>The respondent has concerns about:-</p> <ul style="list-style-type: none"> - Mount Street junction - Little Park Farm holiday cottage traffic - Pedestrians in roadway - Access for construction traffic opposite Baptist Chapel - Requires reassurance that their home and peace of mind would be safeguarded - Loss of valuable arable and pasture land. <p>In addition the respondent states "...are any new residents going to improve the prosperity of the town by shopping locally, or are they just going to shoot off in their cars to the nearest supermarket"</p>	<p>5.1 Housing & Development 5.2 Infrastructure 5.3 Environment 5.4 Economy & Tourism</p> <p>The Cherry Gardens site (BANS117) will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15</p> <p>The steering group are working to find potential new retail and employment opportunities in the town centre, which we hope would encourage local shopping.</p>
H-OEG-07	(no headings)	<p>The respondent states "My concern is not with the proposed housing off of Park Gate Farm but with the access route for the heavy construction traffic. The possible Mount Street turn onto the farm track is a difficult one. This was proved when holiday cottages were built at the farm – with close calls to my neighbours corner cottage, a serious accident, and considerable traffic hold ups not helped by cars parked in the road by the Church"</p>	<p>We are assuming that the respondent is making comments against Cherry Gardens site (BANS117), The Cherry Gardens site (BANS117) will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15.</p>

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H-OTQ-04	(no headings)	<p>The respondent states "Totally against any building at Glengorse anywhere in the park. It needs protecting"</p> <p>The respondent prefers smaller developments and states "I really love the small areas you are promoting, like Marley Lane, Loose Farm, Caldbec House... (maybe restrict it to 4/5 houses?). Small developments like this won't result in too much impact for the local residents or the infrastructure"</p> <p>The respondent states "<u>Don't give in to RDC</u> and their opinions you are our local reps upholding our views. The easy option is to do what they say, but please <u>do not</u> because that is what neighbourhood planning is all about surely??"</p>	<p>The steering group met Rother Investment owners of Telham Court and they have clarified that they wish to remain private for business purposes. The house and most of the grounds have been included in the Local Heritage Listing and will not be included in the Neighbourhood Plan's proposed development sites.</p> <p>Marley Lane Site BANS103 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15.</p> <p>The Loose Farm Site BANS118 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15.</p> <p>Following discussions between the land owner of the Caldbec House site (BA36a) and the steering group, a figure of 9 dwellings was shown in the Regulation 14 pre-submission document; this will be amended to show <u>up to 9</u> dwellings following discussions with RDC.</p> <p>The steering group are confident they have had sufficient local engagement with the community via public consultations, drop-in sessions, Parish Assemblies, Parish newsletters, newspapers, and social media.</p> <p>The selection criteria for all sites were applied by AECOM, taking into account the RDC 2013 SHLAA, and (NPPF) national criteria, which supported specific housing numbers to be delivered within the Rother District. The number of dwellings for Battle Civil Parish have to be attained and are not negotiable.</p> <p>The steering group then used locally-derived criteria</p>

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			from public consultations, which were then applied equally to all sites.
O-OJX-01	5.1 Housing and Development	<p>5.1 Housing and Development-</p> <p>The respondent has concerns about BA31a Telham Court or Glengorse, such as the impact of the development on the history and beauty of the estate, and the wildlife.</p>	<p>5.1 Housing and Development-</p> <p>The steering group met Rother Investment owners of Telham Court and they have clarified that they wish to remain private for business purposes. The house and most of the grounds have been included in the Local Heritage Listing and will not be included in the Neighbourhood Plan's proposed development sites.</p>
	5.2 Infrastructure	<p>The respondent states "Glengorse estate (house, gardens and all the grounds) needs protection by you NOT development. You say our views are important and this plan is developed by the public, so why are you still not listening to us when we have said this time and time again?"</p> <p>5.2 Infrastructure-</p> <p>The respondent states "At the moment it takes me over 20 minutes to drive from my house to the doctors surgery Now. I am unable to walk that distance yet you state it is in walking distance to the town centre. What town centre? The Hastings Road is busy, the junction out of the estate is difficult and dangerous (2 accidents when you conducted your survey), 4 accidents last year and a fatal one at the garage. And you are asking for more houses here near to another busy junction when Blackfriars is built. WE CANNOT COPE WITH ANY MORE TRAFFIC THIS SIDE OF TOWN. Also the roads at Glengorse are just not wide enough for the easy passing of vehicles</p>	<p>We agree that public opinions are important, and as a result the house and most of the grounds have been included in the Local Heritage Listing and will not be included in the Neighbourhood Plan's proposed development sites.</p> <p>5.2 Infrastructure-</p> <p>ESCC Highways have accepted access to/from Blackfriars site onto A2100 to be manageable. (Planning ref RR/2019/604/P)</p> <p>Once a planning application for Glengorse (BA31a) has been submitted, it will be subject to the usual review by ESCC Highways.</p> <p>Road safety is outside of the remit of Neighbourhood Plan, but our understanding is that the ESCC Highways safety audit does not indicate a high risk.</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		past each other"	The width of existing roads is not within the remit of the Neighbourhood Plan, however, vehicle access will be dealt with in any future planning application by RDC. However, once Civil Parking Enforcement is in place the traffic flows in Glengorse should be improved.
	5.3 Environment	5.3 Environment- The respondent states "Your proposed site will ruin the environment as I have stated above"	5.3 Environment- See response to 5.1
	5.4 Economy and Tourism	5.4 Economy and Tourism The respondent states "Your proposed development proposal in the town centre (where the centre is though is anyone's guess) is BAD. You should be protecting the centre, where all the historical importance that makes Battle a major tourist town and its success ultimately hangs on this not being ruined. You will ruin the economy"	5.4 Economy and Tourism- We surmise that the respondent is referring to BANS117 (Cherry Gardens). The Cherry Gardens site (BANS117) will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15
	6. Implementation, Monitoring and Review	6. Implementation, Monitoring and Review- You have not been monitoring or reviewing Glengorse estate. Otherwise you would have listened to what had been said by the residents before. Why are you still going ahead with developing this estate then? You only have 18-20 houses to build to hit your target, so it just easier to dump them all on Glengorse?	6. Implementation, Monitoring and Review- We believe we have had sufficient engagement with the community via public consultations, drop-in sessions, Parish Assemblies, Parish newsletters, newspapers, and social media. The AECOM report originally proposed 70 dwellings at Glengorse on a larger site (BA31 and BA23). The steering group used locally-derived criteria, which were then applied equally to all the sites and as a

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
	Comments on other documents	<p>Comments on other documents-</p> <p>The respondent states "You are going against the public and residents wishes to NOT DEVELOP GLENGORSE ESTATE. You will be harming the wildlife, harming the environment, making more congestion, ruining a beautiful house and estate. I am presuming you all live on the other side of town and cannot appreciate the difficulties you are placing us under if you continue to go ahead with the development. For the third time of filling forms, actually listen to what we are saying"</p>	<p>result this was reduced to a single site (BA31a), which will be designated for up to 20 dwellings, therefore we do not agree with the respondent's "dump" assertion.</p> <p>We do not agree with the respondent's assertions that the Regulation 14 Neighbourhood Plan is "going against" resident's wishes. The plan has to strike a balance between site locations and sizes within the whole civil parish.</p> <p>In addition it should be noted that members of the steering group are volunteers and reside throughout the civil parish.</p> <p>As we have previously stated, we believe we have had sufficient engagement with the community via public consultations, drop-in sessions, Parish Assemblies, Parish newsletters, newspapers, and social media.</p>
O-0TX-01	7. Community Aspirations	<p>7. Community Aspirations</p> <p>The respondent states "We need more pavements on both sides of the road. You are trying to promote walking and cycling but both are dangerous due to lack of pavements and bicycle paths. Your proposed new one does nothing to help us this side of town"</p> <p>Comments on other documents -</p> <p>The respondent states "Telham Court is almost still an entire estate. It should be protected not built on". They also have concerns about wildlife on the site.</p> <p>Concerns about placing an extra burden on the exit from Glengorse</p>	<p>7. Community Aspirations</p> <p>Whilst we understand and appreciate your concerns the provision of off-site pavements is not within the remit of the Neighbourhood Plan but is a matter for ESCC Highways. However, these issues are included in the Community Aspirations.</p> <p>Comments on other documents-</p> <p>The house and most of the grounds have been included in the Local Heritage Listing and will not be included in the Neighbourhood Plan's proposed development sites.</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
	Comments on other documents	<p>onto Hastings Road and its proximity to the Blackfriars exit.</p> <p>The respondent states "Please do not add to more difficulties by giving us all the houses for the target you are left to fill"</p>	<p>ESCC Highways have accepted access to/from Blackfriars site onto A2100 to be manageable. (Planning ref RR/2019/604/P)</p> <p>Once a planning application for Glengorse (BA31a) has been submitted, it will be subject to the usual review by ESCC Highways.</p> <p>The AECOM report originally proposed 70 dwellings at Glengorse on a larger site (BA31 and BA23). The steering group used locally-derived criteria, which were then applied equally to all the sites and as a result this was reduced to a single site (BA31a), which will be designated for up to 20 dwellings, therefore we do not agree with the respondent's request.</p>
O-0TX-02	Comments on other documents	<p>Comments on other documents-</p> <p>The respondent has concerns about historic planning, motor access, altering an area of natural outstanding beauty and the basic material standing of an important historical house and grounds. Also states "...altering stipulations that the area must be used for "educational purposes"."</p> <p>The respondent continues, stating "A site-visit by the Rother district council committee demonstrated that, unlike other more adaptable Battle locations, this is not an area that can be developed with natural or economic ease"</p> <p>The respondent has concerns about commuters parking in the existing Glengorse estate, the placement of yellow lines, the</p>	<p>Comments on other documents-</p> <p>Historic planning records indicate that Rother's Strategic Housing Land Availability Assessment 2013 confirms the site was considered developable. The AECOM report originally proposed 70 dwellings at Glengorse on a larger site (BA31 and BA23). The steering group used locally-derived criteria, which were then applied equally to all the sites and as a result this was reduced to a single site (BA31a), which will be designated for up to 20 dwellings.</p> <p>A planning application was made for change of use from Educational to Business use as part of RR/91/0618/P (approved on 1st Feb 1992)</p> <p>This is not within the remit of the Neighbourhood Plan, however, vehicle access will be dealt with in any future</p>

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		<p>proximity to Blackfriars site and the impact on access for emergency vehicles.</p> <p>The respondent states "Telham Court House and all of its grounds should be protected by our own town council and should not be being considered for any kind of development which will undermine its beauty and importance to wildlife and fauna"</p> <p>The respondent has concerns about potential flooding</p> <p>The respondent states "I will not support this proposal in its current form when it comes to referendum"</p>	<p>planning application by RDC.</p> <p>With regards to commuters parking this should cease to be an issue once Civil Parking Enforcement is in force.</p> <p>ESCC Highways have accepted access to/from Blackfriars site onto A2100 to be manageable. (Planning ref RR/2019/604/P)</p> <p>The house and most of the grounds have been included in the Local Heritage Listing and will not be included in the Neighbourhood Plan's proposed development sites.</p> <p>Once a planning application for Glengorse (BA31a) has been submitted, it will be subject to planning conditions for Suburban Urban Drainage Systems ('SUDS') as advised by Southern Water</p> <p>If the Neighbourhood Plan fails at referendum there will be no protection for Local Green Spaces, Green Gaps, and there will be no local influence on the sites chosen by developers for housing.</p>
O-0TX-03	Comments on other documents	<p>Comments on other documents-</p> <p>The respondent states "I totally oppose your idea to push through any development here. We have already given our feedback at all your consultations but you still do not listen"</p> <p>The respondent has concerns over road safety issues, additional pavements, traffic calming, better street lighting at the Glengorse</p>	<p>Comments on other documents-</p> <p>We disagree with the respondent as we believe we have had sufficient engagement with the community via public consultations, drop-in sessions, Parish Assemblies, Parish newsletters, newspapers, and social media.</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		<p>exit, the station and all along the Hastings Road.</p> <p>The respondent has concerns over the close proximity of the Blackfriars estate making the main roads even busier.</p> <p>The respondent states "The Telham Court House should be protected and also its grounds and estate"</p> <p>The respondent has concerns over the width of the feeder road to Glengorse, and states "Emergency vehicles would not be able to pass in an emergency"</p> <p>The respondent states "We have been stating this at all your consultations but still you do not hear us. This proposed development should not be top of your list due to the history of Telham Court, the bad entrance on to the main road and the potential flooding that these new houses will make to the overflow at Tumbledown. NO DEVELOPMENT AT GLENGORSE".</p>	<p>Whilst we understand your concerns, all of these issues are outside the remit of the Neighbourhood Plan and are the responsibility of ESCC Highways. However, the majority of these concerns have been included in the Community Aspirations.</p> <p>ESCC Highways have accepted access to/from Blackfriars site onto A2100 to be manageable. (Planning ref RR/2019/604/P) Once a planning application for Glengorse (BA31a) has been submitted, it will be subject to the usual review by ESCC Highways</p> <p>The house and most of the grounds have been included in the Local Heritage Listing and will not be included in the Neighbourhood Plan's proposed development sites.</p> <p>This is not within the remit of the Neighbourhood Plan, however, vehicle access will be dealt with in any future planning application by RDC.</p> <p>Once a planning application for Glengorse (BA31a) has been submitted, it will be subject to planning conditions for Suburban Urban Drainage Systems ('SUDS') as advised by Southern Water. For all other comments please see previous comments above.</p> <p>Whilst we appreciate the concern of the respondent, who does not wish to see development at Glengorse,</p>

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			the overall plan has to strike a balance between site locations and sizes within the whole civil parish.
O-ANK-08	(by email)	<p>The respondent's comments are summarised as follows:</p> <p>Allegations of "corruption by some of its members" (e.g. the steering group)</p> <p>Assertions that they had undeclared vested interests and influenced the strategic direction of the plan</p> <p>Allegations based on a meeting attended by the complainant and what they had been told by an un-named third party.</p> <p>Allegations that named person on the steering group had previously sent numerous emails on "tree orders on land"</p> <p>Complainant intends to inform friends of their assertion that there was a corrupt process.</p> <p>Complainant alleges that previous complaint had not had a response.</p> <p>The respondent states "I would like to know that this email will be included in feedback on the plan - otherwise it shows more CORRUPTION - please say you will"</p>	<p>As summarised, these matters were referred to the Town Clerk who responded as follows: <i>"I confirm that your comments have been noted and assure you that I am confident that no impropriety has occurred during the extensive work undertaken by the Steering Group"</i></p> <p>Previous and current Chairman had made responses to all previous emails.</p> <p>The steering group have summarised the text from all Regulation 14 respondents to aid reporting clarity as advised by the independent consultant – this is the case here also.</p>
O-OTX-04	1.1 – Introduction 1.2 -	1.1 – Introduction 1.2 - Neighbourhood Area 1.3 - The Planning Policy Context	1.1 – Introduction 1.2 - Neighbourhood Area 1.3 - The Planning Policy Context

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
	Neighbourhood Area	2.1 The Plan Process	2.1 The Plan Process
		5.1 Housing and Development	5.1 Housing and Development
	1.3 - The Planning Policy Context	5.2 Infrastructure	5.2 Infrastructure
	2.1 The Plan Process	To all of the above sections, the respondent states "I am against any development at Glengorse"	Whilst we appreciate the concern of the respondent, who does not wish to see development at Glengorse, the overall plan has to strike a balance between site locations and sizes within the whole civil parish.
	2.2 Community Engagement	2.2 Community Engagement- The respondent states "I am not sure you have done enough of this as you would already know the strong feeling in the immediate area against any development at Glengorse"	2.2 Community Engagement- We believe we have had sufficient engagement with the community via public consultations, drop-in sessions, Parish Assemblies, Parish newsletters, newspapers, and social media.
	2.3 Evidence Base	2.3 Evidence Base- The respondent states "What is your evidence for over-riding what the residents want? This is supposed to be a local plan put together with the local residents opinions taken into consideration. Which is not being done. What is your evidence?"	2.3 Evidence Base- The sites shortlisted by the steering group for potential development, following the AECOM review, have all been below 25 dwellings in number as preferred by residents in the 2016 AiRS survey, whereas some sites given planning permission by RDC exceed this number. The AECOM report originally proposed 70 dwellings at Glengorse on a larger site (BA31 and BA23). The steering group used locally-derived criteria, which were then applied equally to all the sites and as a result this was reduced to a single site (BA31a), which will be designated for up to 20 dwellings.
		4.1 Vision	

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
	4.1 Vision	The respondent states "Your vision should be to take into consideration what local residents want. So your vision is flawed"	4.1 Vision The vision was derived after consideration of public opinion expressed in the 2016 AiRS survey and therefore it does take into consideration the views of the residents (e.g. approx 35% of the 2800 survey forms distributed)
	5.3 Environment	5.3 Environment The respondent has concerns over the impact of development on wildlife.	5.3 Environment Only the northern playing field has been put forward for development of up to 20 dwellings. The house, the southern playing field and the remainder of the grounds have been included in the Local Heritage Listing and will not be included in the Neighbourhood Plan's proposed development sites.
	5.4 Economy and Tourism	5.4 Economy and Tourism The respondent states "I am against any development at Glengorse, Caldec House and the site near the car park. You will ruin the historic fabric of the town and ruin the reason why people come to visit a medieval, quaint, rural and historic town. Shame on you"	5.4 Economy and Tourism The selection criteria for all sites were applied by AECOM, taking into account the RDC 2013 SHLAA, and (NPPF) national criteria. The steering group then used locally-derived criteria, which were then applied equally to all sites. Once the Neighbourhood Plan has been adopted, all planning applications should comply with the Battle Design Guidelines and High Weald Housing Design Guide which will respect the local vernacular. In addition The Cherry Gardens site (BANS117) will not be included in the Neighbourhood Plan Proposal
	6.	6. Implementation, Monitoring and Review The respondent states "Are you actually listen to what the public	

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
	Implementation, Monitoring and Review	have stated before? If not you would know that there is a strong feeling of protecting and keeping Glengorse house and estate for the future generations". In addition the respondent has concerns over potential further development on this site.	Submission to RDC for Regulation 15.
	7. Community Aspirations	7. Community Aspirations The respondent states "Pavements both side of the road, especially at the bridge at Tescos, better street lighting here and all along the Hastings Road, slower traffic"	6. Implementation, Monitoring and Review See 5.3 response above concerning loss of beautiful and historic estate. The steering group met Rother Investment owners of Telham Court and they have clarified that they wish to keep the estate largely undeveloped, retaining most of the green spaces and keeping the old house private for business purposes.
	Comments on other documents	Comments on other documents- The respondent states "Listen to what we are saying, again. No development at Glengorse. The exit is dangerous and with the Blackfriars development going through the extra exit onto Hastings Road just a few metres away will make our exit onto the main road even more dangerous. Do not destroy a historic house and its grounds and estate"	7. Community Aspirations Whilst we understand your concerns, all of these issues are outside the remit of the Neighbourhood Plan and are the responsibility of ESCC Highways. However, the majority of these concerns have been included in the Community Aspirations Comments on other documents With regards to "No development at Glengorse" please see various responses above. ESCC Highways have accepted access to/from Blackfriars site onto A2100 to be manageable. (Planning ref RR/2019/604/P) Once a planning application for Glengorse (BA31a) has been submitted, it will be subject to the usual review by ESCC Highways. Regarding the historic house and its grounds and estate, please see comments above.

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
O-0YX-01	Comments on other documents	<p>Comments on other documents</p> <p>The respondent has the following concerns:-</p> <ul style="list-style-type: none"> - Public consultation - Protection of historic house and grounds - Wildlife - Road exits and the proximity to Blackfriars - Traffic numbers - Road width in Glengorse <p>The respondent states "Keep Glengorse clear of more housing. Follow the site at Loose Farm that only has 3 houses suggested for it or the one in Marley Lane with only 2. 2 to 3 house will not make much of impact; 18 to 20 houses (and who knows how many after that, if this allowed to go ahead) will"</p>	<p>Comments on other documents</p> <ul style="list-style-type: none"> - We believe we have had sufficient engagement with the community via public consultations, drop-in sessions, Parish Assemblies, Parish newsletters, newspapers, and social media. - The house and most of the grounds have been included in the Local Heritage Listing and will not be included in the Neighbourhood Plan's proposed development sites. - As only the northern playing field has been put forward for development of up to 20 dwellings, the potential impact on wildlife will be minimal. - ESCC Highways have accepted access to/from Blackfriars site onto A2100 to be manageable. (Planning ref RR/2019/604/P) - With regard to traffic numbers, once a planning application for Glengorse (BA31a) has been submitted, it will be subject to the usual review by ESCC Highways, including evaluation of road width. <p>Whilst we appreciate the concern of the respondent, who does not wish to see development at Glengorse (BA31a), the overall plan has to strike a balance between site locations and sizes within the whole civil parish.</p> <p>Finally it should be noted that sites at Loose Farm (BANS118) and Marley Lane Site BANS103 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
O-0TA-03	Comments on other documents	<p>Comments on other documents.</p> <p>The respondent states the following:-</p> <ul style="list-style-type: none"> - "I am in agreement with your plans for small sites; NS118 and NS103 are good because they will not have much of an impact on the areas where they are sited." - "The Glengorse house itself should be listed and the entire estate and grounds should be included in your Heritage listing if it is not" - "However I do oppose the site at Glengorse" - "You need to take heed of what the local residents say as we live here and know the problems" - "If you building more in your centre, you are going to affect the fabric of buildings and history that bring visitors into Battle and help keep the economy going." - "You need to have a section on employment as this is the heart of a successful town. I see no plans to increase the employment which is essential for a rural country town" - "I do like your Community Aspirations though although you need to write more in for slowing the traffic down and better street lighting" 	<p>Comments on other documents</p> <p>We thank you for your comments but can confirm that the sites at Loose Farm (BANS118) and Marley Lane Site BANS103 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15.</p> <p>The house and most of the grounds have been included in the Local Heritage Listing and will not be included in the Neighbourhood Plan's proposed development sites.</p> <p>Whilst we appreciate the concern of the respondent, who does not wish to see development at Glengorse (BA31a), the overall plan has to strike a balance between site locations and sizes within the whole civil parish.</p> <p>We believe we have had sufficient engagement with the community via public consultations, drop-in sessions, Parish Assemblies, Parish newsletters, newspapers, and social media.</p> <p>It is assumed that the respondent is referring to the Cherry Gardens site (BANS117), The Cherry Gardens site (BANS117) will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15.</p> <p>Following advice from Rother District Council and</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		<p>The respondent also has the following concerns:-</p> <ul style="list-style-type: none"> - Entrance to Glengorse being dangerous, and proximity to Blackfriars. Extra vehicles adding to traffic congestion - Suggests that cycling or walking is not practicable. 	<p>feedback from individuals, employment will now form part of the Neighbourhood Plan.</p> <p>Thank you for your support on Community Aspirations, which will be edited to include comments from the consultations but the two issues you mention are outside the remit of the Neighbourhood Plan and are the responsibility of ESCC Highways.</p> <p>ESCC Highways have accepted access to/from Blackfriars site onto A2100 to be manageable. (Planning ref RR/2019/604/P) Once a planning application for Glengorse (BA31a) has been submitted, it will be subject to the usual review by ESCC Highways.</p> <p>We disagree with these comments as we are trying to encourage a healthy and ecologically sound lifestyle within the Parish. The AiRS document (page 27) reports that cycling was supported by 44%, and walking by 82% of respondents.</p>
O-0TX-05	Comments on other documents	<p>Comments on other documents-</p> <p>The respondent states the following:-</p> <ul style="list-style-type: none"> - "Appalling suggestion to keep on promoting Glengorse as a development site" - "The grand house and entire grounds need to be protected for 	<p>Comments on other documents-</p> <p>Whilst we appreciate the concern of the respondent, who does not wish to see development at Glengorse (BA31a), the overall plan has to strike a balance between site locations and sizes within the whole civil parish.</p> <p>The house, the southern playing field and the</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		<p>historical and architectural importance”</p> <p>The respondent also has concerns about:</p> <ul style="list-style-type: none"> - The number of dwellings and potential future development. - Road access and width - Previous consultations not being heeded 	<p>remainder of the grounds have been included in the Local Heritage Listing and will not be included in the Neighbourhood Plan’s proposed development sites.</p> <p>Only the northern playing field has been put forward for development of up to 20 dwellings.</p> <p>For road access, once a planning application for Glengorse (BA31a) has been submitted, it will be subject to the usual review by ESCC Highways, including evaluation of road width.</p> <p>We believe we have had sufficient engagement with the community via public consultations, drop-in sessions, Parish Assemblies, Parish newsletters, newspapers, and social media. Many amendments have been made as a result of previous consultations; for further information see PowerPoint presentations on NP website (“Original Site Selection Presentation 2019” and “Final Site Selection Presentation”) for information on how decisions were made.</p>
O-0TX-06	Comments on other documents	<p>Comments on other documents-</p> <p>1. The respondent suggests that the site (BA31 Glengorse) should have been “double scored” as compared with Loose Farm site (118).</p> <p>Also concerns about proximity of a “beautiful stately home” and it not being a brown field site.</p>	<p>Comments on other documents-</p> <p>1. The selection criteria for all sites were applied by AECOM, taking into account the RDC 2013 SHLAA, and (NPPF) national criteria.</p> <p>The steering group then used locally-derived criteria, which were then applied equally to all sites.</p> <p>For further information see PowerPoint presentations on NP website (“Original Site Selection Presentation</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		<p>2. The respondent requests that Telham Court, the stables and gardens are included and protected on Battles Heritage Listing</p> <p>3. The respondent comments that Glengorse house and the grounds should be protected for rare wildlife.</p> <p>4. The respondent is concerned about the exit onto the Hastings Road from Glengorse and this will be made worse once Blackfriars is developed. It will make access out of both sites difficult and dangerous and will lead to more traffic congestion.</p> <p>5. The respondent considers it unfair to expect Glengorse and Telham residents to bear the brunt and the volume of building that is planned for this side of the town. Additionally states "we cannot accept any further developments that exceed 4 or 5 houses"</p> <p>6. The respondent has concerns over road safety issues.</p> <p>7. The respondent is concerned that the roads in Glengorse are too narrow for ease of vehicle movement.</p> <p>Also mentions parking by rail travellers in Glengorse and the difficulties this causes.</p>	<p>2019" and "Final Site Selection Presentation") for information on how decisions were made.</p> <p>2. The house and most of the grounds have been included in the Local Heritage Listing and the land (with the exception of BA31a) will not be included in the updated Neighbourhood Plan's proposed development sites.</p> <p>3. See comment 2 above.</p> <p>4. ESCC Highways have accepted access to/from Blackfriars site onto A2100 to be manageable. (Planning ref RR/2019/604/P) Once a planning application for Glengorse (BA31a) has been submitted, it will be subject to the usual review by ESCC Highways.</p> <p>5. The AECOM report originally proposed 70 dwellings at Glengorse on a larger site (BA31 and BA23). The steering group used locally-derived criteria, which were then applied equally to all the sites and as a result this was reduced to a single site (BA31a), which will be designated for up to 20 dwellings.</p> <p>6. Whilst we acknowledge your concerns, road safety issues are outside of the remit of the Neighbourhood Plan. However, our understanding is that the ESCC Highways safety audit does not indicate a high risk in this area.</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		<p>8. The respondent states "if you allow Glengorse to be developed at this stage, then the original housing figure of 70 residencies will be allowed to go through at a later date, possibly if and when the government pushes through more housing numbers"</p> <p>9. The respondent states "The Neighbourhood Plan is for local people to determine whether proposed sites are suitable with their local knowledge, so please do not ignore us"</p>	<p>7. This is not within the remit of the Neighbourhood Plan, however, vehicles access will be dealt with in any future planning application by RDC. With regards to commuters parking this should cease to be an issue once Civil Parking Enforcement is in force.</p> <p>8. The AECOM report originally proposed 70 dwellings at Glengorse on a larger site (BA31 and BA23). The steering group used locally-derived criteria, which were then applied equally to all the sites and as a result this was reduced to a single site (BA31a), which will be designated for up to 20 dwellings. Also please note that the house and most of the grounds have been included in the Local Heritage Listing and will not be included in the Neighbourhood Plan's proposed development sites.</p> <p>9. We believe we have had sufficient engagement with the community via public consultations, drop-in sessions, Parish Assemblies, Parish newsletters, newspapers, and social media. The selection criteria for all sites were applied by AECOM, taking into account the RDC 2013 SHLAA, and (NPPF) national criteria. The steering group then used locally-derived criteria, which were then applied equally to all sites. For further information see PowerPoint presentations on NP website ("Original Site Selection Presentation</p>

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			2019" and "Final Site Selection Presentation") for information on how decisions were made.
O-OTG-10	5.1 Housing and Development	<p>5.1 Housing & Development</p> <p>The respondent has concerns on the narrow access roads on BANS118 (Loose Farm) and the absence of footpaths.</p> <p>1. The respondent suggests we re-examine the latest housing figures passed by RDC and amend our target</p> <p>2. Feels we should increase the housing targets in Glengorse to allow 35 rather than having a small development opposite.</p> <p>3. The respondent suggests Blackfriars figure should be pushed to absorb more rather than small sites .</p> <p>4. On Loose Farm site (BANS118), the respondent feels that the lack of pedestrian footpath is dangerous for 3 or 4 houses; the road needs to be adopted before any new houses are built</p> <p>Thinks if we allow BA31a and NS118 it will encourage "linking" the two sites together</p> <p>The respondent has concerns about scoring of BA23 site ("Land to rear of 26 Hastings Road")</p> <p>The respondent states "In table 3 of the Strategic Environmental Assessment, for objective 11 (reduce emissions of greenhouse</p>	<p>5.1 Housing & Development –We understand your concerns, however, please note that the Loose Farm Site BANS118 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15.</p> <p>1. Calculations were based on information available at 01/04/2019</p> <p>2. After review, a figure of up to 20 dwellings is proposed. The Neighbourhood Plan is attempting to restrict the size of developments in line with the communities wishes as expressed in the AiRS survey.</p> <p>3. This is outside the remit of the NP. The number is set by the RDC Core Strategy.</p> <p>4. The Loose Farm Site BANS118 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15.</p> <p>Concerning BA23, please refer to "Preferred site selection (revised 2020)" on the Neighbourhood Plan website.</p> <p>This site was not supported by the land owner and so</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
	Your comments on the Statutory Environmental Assessment	<p>gases), all sites are rated as 'amber', this scoring is flawed as surely those sites that are close to the town centre / the rail station are more likely to encourage trips to be made which do not create greenhouse gases / pollution (eg walk / cycle), compared to those sites that are far from facilities from which people will overwhelmingly be using the car for all journeys. As such some should be scored 'green' if close to the centre, and 'red' for those that are far away"</p> <p>The respondent states "In table 4 of the Strategic Environmental Assessment, the text for site BA NS118 states that 'The capacity of the site is a relatively small figure, therefore should not significantly increase the concentration of vehicle traffic. Listed building adjacent to the site. It is a green field site.', as such it is given a 'green' rating. As noted above this seems to be based on flawed logic, that it is fine to build on locations that are poorly served by public transport / far from public facilities on foot, as long as the number of houses are small in number. Surely it is better to build on sites that are closer to the town centre at slightly higher rates (see comment on Glengorse and Blackfriars in paras above)."</p> <p>The respondent suggests "the 'RAG' scoring of the shortlisted sites should be performed again to see which sites should be shortlisted for the Neighbourhood Plan"</p> <p>Your comments on the Strategic Environmental Assessment.</p> <p>All the comments relating to this section are a copy of the 5.1 Housing & Development and therefore see above for summary</p>	<p>was withdrawn from the list of sites that were available.</p> <p>The SEA addresses this.</p> <p>The Loose Farm Site BANS118 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15.</p> <p>The shortlist was created by AECOM and the RAG scoring applied by the Steering Group and therefore there is no reason to review it further.</p> <p>Your comments on the Strategic Environmental Assessment.</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
			All the comments relating to this section are a copy of the 5.1 Housing & Development and therefore see above for the steering group responses
O-9PY-01	2.2 Community Engagement	2.2 Community Engagement The respondent states "I have been able to attend a number of events - I was pleased to see documents available on line"	2.2 Community Engagement We are pleased that you were able to attend a number of our events, and were able to access documents online.
	5.1 Housing and Development	5.1 Housing and Development The respondent states "Clearly explains the number of units which need to be provided."	5.1 Housing and Development We are pleased that our explanation of the number of dwellings was clear.
	5.2 Infrastructure	5.2 Infrastructure The respondent states "Clearly defines the scope of the plan"	5.2 Infrastructure - We are pleased that the scope of the Neighbourhood Plan is clearly defined.
	5.3 Environment	5.3 Environment The respondent states "Clearly lists the sites which are designated as green spaces."	5.3 Environment - This is an important part of the overall document and we appreciate your comments on the designated green spaces.
	7. Community Aspirations	7. Community Aspirations The respondent states "As a Netherfield resident I support the majority of the aspirations. I would however like to point out that (1) I understand that there are proposals in place to improve the reliability of the power supply in Darvell Down which seems to have more outages than the rest of Netherfield. (2) Power outages in Netherfield do NOT affect the water supply - this occurs when the power is cut to the pumping station which is in Battle (3) Fibre cabinets have been installed which means that high speed	7. Community Aspirations - We appreciate your support for the Community Aspirations, which is being edited to add further details highlighted during the Regulation 14 consultation. 1) Power supply is outside of the remit of the Neighbourhood Plan but is included within the Community Aspirations. 2) Thank you for informing us on the power outages in Netherfield, and to the fact they <u>do not</u> affect the

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
	Comments on other documents	<p>broadband is available. The comments made may refer to those who are still on the old method of connection"</p> <p>Comments on other documents- The respondent states "Green Space analysis. I welcome the inclusion of the Netherfield Recreation Ground NE GS04 as a designated green space although my understanding is that that it is owned by local trustees rather than RDC as stated in one of the documents. Preferred Sites List. I welcome the inclusion of sites NE06/NENS102 and NE05/NE05r which together with the other site for which planning has been granted meets the target of homes for Netherfield. I believe that site NE05/NE05r should be given priority for development."</p>	<p>water supply. 3) Thank you for advising us on the availability of high speed broadband in Netherfield and further enhancement of the service is included in the Community Aspirations.</p> <p>Comments on other documents- We are very pleased that you welcome the inclusion of the Netherfield Recreation Ground as a designated Green Space.</p> <p>We are really pleased that you support the inclusion of NE06/NENS102 and NE05a/NE05r, which together with NE01 (RR/2019/921/P) meets the target of new dwellings in Netherfield.</p>
O-1JG-01	<p>5.1 Housing and Development</p> <p>5.3 Environment</p>	<p>5.1 Housing and Development- The respondent states "New buildings should contain nest and rest places in the form of Swift and Bat Bricks, for attractive and compatible bird species (Swifts, Martins, Swallows, Titmice, House Sparrows, Starlings and Wrens) and Bat species"</p> <p>5.3 Environment- The respondent states "This should consider the biodiversity of all built on and built up areas as well as the surrounding landscape, to achieve biodiversity in depth and to take advantage of the many opportunities than can be created through imaginative, intelligent and well informed planning for biodiversity"</p> <p>7. Community Aspirations-</p>	<p>5.1 Housing and Development- Planning applications are frequently subject to ecological assessments. The Neighbourhood Plan has adopted the High Weald Housing Design Guide and policy DG10 on page 39 covers these aspects.</p> <p>5.3 Environment- We acknowledge your comments and concerns. However, the policy refers to conservation within the development sites and in the countryside beyond and includes mitigation measures to compensate for unavoidable ecological damage, and is used as an opportunity to enhance biodiversity.</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
	7. Community Aspirations	The respondent state "To protect and encourage threatened species such as Swifts and House Sparrows, within a framework of creating a rich local biodiversity within the built area, and around it, and by extending the concept, creating a patchwork of rich self-supporting biodiversity "hot spots" across the landscape. By creating these modern "oases" wildlife can move as need be, and find support in a ever widening area. Any new development needs to be viewed and established within this "oasis" concept"	7. Community Aspirations- Concern for local biodiversity within the built area is already included in Community Aspirations. Furthermore the High Weald Housing Design Guide policy DG10 which is adopted in the Neighbourhood Plan, covers support for a rich biodiversity."
O-8EB-01	2.2 Community Engagement	2.2 Community Engagement- The respondent states "Objective 2 for Battle & Telham 'To Protect & Encourage Wildlife & the AONB' - There should be specific considerations for swifts & house martins as priority species. Swifts decline by 50% every 20 years & by 25% every 5 years. Our local swift population require protection & provision of new nesting sites by the inclusion of swift bricks & boxes"	2.2 Community Engagement- Planning applications are frequently subject to ecological assessments. The Neighbourhood Plan has adopted the High Weald Housing Design Guide and policy DG10 on page 39 covers these aspects.
	5.1 Housing and Development	5.1 Housing and Development- The respondent believes that policy HD4 should include mandatory inclusion of Swift Bricks and Boxes. The respondent also states "Provision for the house martin population should also apply as both birds are priority species."	5.1 Housing and Development- The steering group has asked the consultant to amend the policy to encourage Swift Bricks to be included where appropriate for new dwellings above 5m in height.
	5.3 Environment	5.3 Environment- The respondent states "Conservation of the Environment, Ecosystems & Biodiversity' - This should consider the biodiversity of the town itself as well as green spaces & the struggling swift & house martin colonies that have nested annually around buildings in Battle for centuries.	5.3 Environment- This is outside the remit of the Neighbourhood Plan as it can only influence future development and not retrospectively on the already built environment.

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
	5.4 Economy and Tourism	Existing nest sites should be preserved & protected all year round & new developments or renovations should take these species into consideration both as priority species. Swift bricks/boxes should be installed wherever possible" 5.4 Economy and Tourism The respondent states "The local swift population should be protected & enhanced by provision of swift bricks & boxes as they are a draw for tourists in the summer months, indeed the swifts are an iconic species associated with the town of Battle"	5.4 Economy and Tourism We have no evidence available to us to support the respondent's claims.
O-1AU-01	5.1 Housing and Development 5.3 Environment 7. Community Aspirations	5.1 Housing and Development- The respondent states "Policy HD4 Quality of Design; 'integration and protection of landscapes' (page 33 of the Draft Neighbourhood Plan) - this should specify the inclusion of swift bricks/ boxes due to the resident population of swifts in Battle." 5.3 Environment The respondent states "Policy EN3 'Conservation of the environment, ecosystems and biodiversity' (think this was page 34 of the Draft Plan!) that this should consider the biodiversity of the town itself (such as the swifts) as well as the environment of the green spaces" 7. Community Aspirations The respondent states "Objective 2 for Battle and Telham; 'to protect and encourage wildlife and the AONB' (on pages 50-51 of the Draft Neighbourhood Plan doc) There should be specific considerations for swifts given, an endangered species - which is	5.1 Housing and Development The steering group has asked the consultant to amend the policy to encourage Swift Bricks to be included where appropriate for new dwellings above 5m in height. We would also point out that swifts are not resident birds but are migratory. 5.3 Environment We acknowledge your comments and concerns and our consultant is considering any relevant amendments. 7. Community Aspirations- The steering group and Battle Town Council have shown their commitment to protect and encourage wildlife and the AONB by adopting the High Weald

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		why Hastings and Rother local swift group has been set up"	Housing Design Guide. Policy DG10 on page 39 covers these aspects.
O-9BN-01	2.2 Community Engagement	<p>2.2 Community Engagement</p> <p>The respondent states "Objective 2 for Battle & Telham 'To Protect & Encourage Wildlife & the AONB' - There should be specific considerations for swifts & house martins as priority species. Swifts decline by 50% every 20 years & by 25% every 5 years. Our local swift population require protection & provision of new nesting sites by the inclusion of swift bricks and boxes"</p>	<p>2.2 Community Engagement- Planning applications are frequently subject to ecological assessments. The Neighbourhood Plan has adopted the High Weald Housing Design Guide and policy DG10 on page 39 covers these aspects.</p>
	5.1 Housing and Development	<p>5.1 Housing and Development-</p> <p>The respondent states "Policy HD4 - Quality of Design, Integration & Protection of Landscapes' This should include the mandatory provision of swift bricks (the 'Manthorpe Swift Brick') & swift boxes to take into account the struggling swift population of Battle who have visited to nest annually in the town for centuries. The recent presentation by Hastings & Rother Swift Conservation Group @ the Memorial Hall accentuated the need for protection & provision of new nesting opportunities within the town. Provision for the house martin population should also apply as both birds are priority species"</p>	<p>5.1 Housing and Development- The steering group has asked the consultant to amend the policy to encourage Swift Bricks to be included where appropriate for new dwellings above 5m in height.</p>
	5.3 Environment	<p>5.3 Environment</p> <p>The respondent states "Conservation of the Environment & Biodiversity' This should consider the biodiversity of hte town itself as well as green spaces & the struggling swift & house martin colonies that have nested annually around buildings in Battle for centuries. Existing nest sites should be preserved & prticted all year round and</p>	<p>5.3 Environment</p> <p>This is outside the remit of the Neighbourhood Plan as it can only influence future development and not retrospectively on the already built environment.</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
	5.4 Economy and Tourism	<p>new developments or renovations should take these species into consideration both as priority species. Swift bricks/boxes should be installed wherever possible."</p> <p>5.4 Economy and Tourism</p> <p>The respondent states "The local swift population should be protected and enhanced by provision of swift bricks and boxes as they are a draw for tourists in the summer months, indeed the swifts are an iconic species association with the town of Battle,"</p>	<p>5.4 Economy and Tourism</p> <p>The steering group has asked the consultant to amend the policy to encourage Swift Bricks to be included where appropriate for new dwellings above 5m in height.</p> <p>We have no evidence available to us to support the respondent's claims concerning swifts being a tourist draw.</p>
O-OJS-02	Comments on other documents	<p>Comments on other documents-</p> <p>The respondents state "We are in favour of the town plan and appreciate the considerable effort involved. It will be good for the town to have a coherent strategy. We would like to comment on the Caldbec Hill development BA36. We are pleased that this will be on the brownfield site near Caldbec House. We are reassured that the procession field is not being considered. This is of considerable importance both historically and visually, being the view from the National Trust sign at the top of Marley Lane (and from the top of Battle Abbey gatehouse) to where Harold's troops are said to have camped on the hill."</p>	<p>Comments on other documents-</p> <p>We thank you for your comments and appreciate your positivity to the efforts of the steering group.</p>
O-ANK-02	Comments on other documents	<p>Comments on other documents -</p> <p>The respondent states the following:</p> <p>"- Why did you not get up and speak at the meeting and enlighten us my issues are not all about houses mine are as follows.</p> <p>- What measures are in place for transport to further education.</p>	<p>Comments on other documents-</p> <p>- The steering group was invited to attend and only listen.</p> <p>- Public transport is not within the Neighbourhood Plan</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		<ul style="list-style-type: none"> - When are we going to get a foot path to our recreation ground - When are improvements going to be made to our power supplyInternet loss of water - When are we going to get funding for our prehistoric play park - When are we the people of Netherfield going to be heard. - My last point it I am a volunteer also and it's my choice to do what I do so I don't feel you need to keep telling us that If you felt what was being said was wrong you should have spoken out" 	<p>remit but is considered under Community Aspirations in Regulation 14 document</p> <ul style="list-style-type: none"> - Footways are not within the remit of the Neighbourhood Plan remit but are considered under Community Aspirations in Regulation 14 document - All of these issues are outside the remit of the Neighbourhood Plan but are all included in Community Aspirations. <p>There has already been an improvement in broadband connectivity in Netherfield.</p> <ul style="list-style-type: none"> - If the Neighbourhood Plan is supported in the referendum residents can make a proposal to Battle Town Council for use of the resultant increase in the Community Infrastructure Levy (CIL) money from currently 15% to 25%. This may be subject to applications for match funding for improvements to the play park. - We believe we have had sufficient engagement with the community via public consultations, drop-in sessions, Parish Assemblies, Parish newsletters, newspapers, and social media. <p>The Neighbourhood Plan has been making suggestions based on people's opinions via community engagements as detailed above.</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
O-OEY-01	Comments on other documents	<p>Comments on other documents -</p> <p>The respondent states "Please could the following document be included in our Battle NP ? http://www.transportfornewhomes.org.uk/about/transport-for-new-homes-charter/"</p>	<p>Comments on other documents -</p> <p>Public transport is not within the Neighbourhood Plan remit but is considered under community aspirations in Regulation 14 document. However it should be noted that the Community Aspirations section covers improvement to public transport to Netherfield and will be extended to Battle and Telham.</p>
O-ANK-03	Comments on other documents	<p>Comments on other documents -</p> <p>The respondent states "I have not responded before because I am generally a supporter of this plan and don't have any better ideas if my own!</p> <p>Not hugely happy at having to accept such a large quota of housing development as it seems likely we will end up changing the character of the town even more 'by attrition' but it seems we are stuck with it.</p> <p>In my view our town council does a good job though and this plan is another example of that so it gets my vote!"</p>	<p>Comments on other documents -</p> <p>Thank you for your support of the Neighbourhood Plan.</p>
O-ANK-04	Comments on other documents	<p>Comments on other documents -</p> <p>The respondent has concerns about:</p> <ul style="list-style-type: none"> - Proper engagement and consultation not happening. - Infrastructure, particularly lack of a GP Surgery in Netherfield 	<p>Comments on other documents-</p> <ul style="list-style-type: none"> - We believe we have had sufficient engagement with the community via public consultations, drop-in sessions, Parish Assemblies, Parish newsletters, newspapers, and social media. - GP Surgery provision is outside the NP remit; however, residents' wishes are included in the revised Netherfield Community Aspirations (quote: "To work towards the provision of a part time doctors surgery/health centre/pharmacy to help residents avoid travelling to Battle town.")

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		<p>- Lack of public transport specifically for people visiting doctors surgeries in Battle</p> <p>The respondent states "Where has the Green Space agenda gone? We need green spaces not only for the environment, but for building better, happier communities who are not trying to live on top of one another!"</p>	<p>Both of the surgeries in Battle have informed us that they currently have the capacity to take on extra patients over the Neighbourhood Plan period.</p> <p>- Public transport is not within the Neighbourhood Plan remit but is considered under Community Aspirations in Regulation 14 document</p> <p>The inclusion of Neighbourhood Plan policy EN2 is an example of the SG listening to Netherfield's expectations and reacting to help protect their viewpoint.</p> <p>The supporting document Local Green Spaces Analysis identified a significant number of Local Green Spaces in Netherfield.</p>
O-7NE-01	3. The Parish background	<p>3. The Parish background and 4.2 Objectives - The respondent states "Paragraph 3.5.6 (Sustrans map). This map is minimal walking and cycling provision and would require ongoing updating and expansion to make walking and cycling a realistic option in Battle"</p> <p>The respondent states: "We would argue that the following matters should be covered by an appropriate policy :</p>	<p>3. The Parish background and 4.2 Objectives- The Battle town area Walking & Cycling routes proposal plan is kindly provided by ESCC Transport Policy Unit, in advance of publication now expected during 2020. (ESCC commissioned a Sustrans survey of a number of locations throughout the county to identify potential Active Travel routes for long term funding; although Battle CP was not originally in their list, we lobbied to be included.)</p> <p>The western segment from Claverham Community College to Battle Abbey is an original Battle resident's proposal known as the Battle Schools Greenway (BSG). This segment is likely to be implemented in several small segments when ESCC funding becomes available</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
	4.2 Objectives	<p>1. A positive attitude and requirement for the provision of facilities for public transport, cycling and walking.</p> <p>2. A positive attitude and requirement for the provision of communications infrastructure.</p> <p>3. In addition to listing in the hope of protecting green spaces, there could be a survey and consequential listing and policy of currently unprotected trees and important hedgerows.</p> <p>4. It does not identify where new non-tourist development which employs people should be placed.</p> <p>Page 28 No mention of encouraging and facilitating walking and cycling for short journeys. Other options could include carpooling, hop on hop off town bus."</p>	<p>within their Local Cycling and Walking Infrastructure Plan. The BSG proposal fits with the Community Aspirations Battle and Telham Objective 1. Battle Town Council have formed a cycling and walking Working Group to consider the ESCC LCWIP proposals and deliver the strategies proposed.</p> <p>1. See comments above</p> <p>2. We have already shown a positive attitude and requirement for the provision of communications infrastructure in policy IN2 in the regulation 14 pre-submission documentation</p> <p>3. We would draw the respondent's attention to "Green Infrastructure Study", which is located on the Neighbourhood Plan website and it was used to provide information for the Local Green Spaces analysis.</p> <p>4. The Neighbourhood Plan steering group is currently undertaking a call for sites for employment and retail opportunities.</p> <p>Facilitating walking and cycling for short journeys are already addressed in Community Aspirations and it will mention carpooling and hop on hop off bus.</p>
	5.1 Housing and Development	5.1 Housing and Development-	<p>5.1 Housing and Development-</p> <p>The steering group challenged Rother District Council</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		<p>- The respondent is perplexed about the housing allocation split between Battle and Netherfield.</p> <p>- The respondent states "We are not sure why Netherfield has not been upgraded to exist as a separate parish, as there is a distinct gap between it and the remainder of Battle"</p> <p>- The respondent states "A general thought about the sites chosen, that they all seem to have access issues"</p> <p>- The respondent is concerned about the small number of responses to the second round of consultation.</p> <p>The respondent states "5.1.1 Substantial areas of 20mph required in town centre. If speed limit provision is fragmented it is usually unsuccessful."</p> <p>The respondent states "Page 30 policy HD2, Criteria No3: Walking and cycling links in the town centre are required to provide access to community facilities"</p> <p>The respondent states "Opportunities housing design to be built carbon neutral, and spaces for recycling bins provided, externally and space for cycle parking."</p>	<p>over the allocation split and were advised that Battle and Telham could not absorb any of the Netherfield allocation.</p> <p>This is not within the remit of the Neighbourhood Plan. It is for Netherfield residents to make representations to RDC</p> <p>We disagree with this assertion.</p> <p>Access was one of the many selection criteria that were applied by AECOM, taking into account the RDC 2013 SHLAA, and (NPPF) national criteria. Once a planning application has been submitted, it will be subject to the usual review by ESCC Highways.</p> <p>Despite publicity we do not have control over resident participation.</p> <p>Battle Town Council is supporting the move to establish an un-fragmented 20mph limit.</p> <p>Agreed, policy revised</p> <p>These issues are covered in the High Weald Management Plan (adopted by RDC) and the High Weald Design Guide (adopted by Battle Town Council and included in the Neighbourhood Plan)</p> <p>5.2 Infrastructure-</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
	5.2 Infrastructure	<p>5.2 Infrastructure-</p> <p>The respondent states "Policy IN1: We think this policy is excessive in that it applies to 'all development' in requiring a traffic assessment."</p> <p>The respondent states "Policy IN3: We think this would sit better as written in the Housing section in that it refers to 'dwellings'. Perhaps it should be widened to cover all development or at least all non-retail commercial and industrial development."</p> <p>The respondent does not think garages should be included in policy IN3, and states "It would be better to positively encourage the building of car ports rather than garages as in our experience the former are always used and only for the purpose intended."</p> <p>The respondent states "Page 37 policy IN1 5.2 - walking and cycling infrastructure to be prioritised rather than prioritizing motorized vehicles"</p> <p>The respondent states "Policy IN3. Provision for electric vehicle charging at new residences. Provision of charging points at community building to assist car charging for residents of building of multiple occupation where one family only points are not practical."</p>	<p>The steering group disagree with the assertion that policy IN1 is excessive. This policy has been amended based on comments from others and states 'major development'.</p> <p>We agree with the majority of the respondent's views and will consider making amendments to our policies. this policy is primarily an infrastructure policy because it is about car parking provision so better suited in this section. This policy has been amended based on comments from others</p> <p>We agree with the respondent's views and have added a new Policy IN4: Pedestrian provision and safety</p> <p>Provision for electric charging points at households is a matter for developers. Access to charging points within the town will be added to Community Aspirations.</p>
	5.3 Environment	<p>5.3 Environment-</p> <p>The respondent states "Policy EN2: This covers the issue of where the natural environmental assets are reduced or damaged because of development: We believe there should be a policy which says, if</p>	<p>5.3 Environment-</p> <p>We agree with your observations and will be modifying our policy.</p> <p>The policy EN2 amended to reflect this and other comments and include net gains for biodiversity.</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		<p>that be the case, they should be replaced somewhere on the site.”</p> <p>The respondent states “Policy HD2: The policy statement that all infrastructure is to be provided should in view of its importance and the sheer length of this policy be separated into a new policy.”</p> <p>Green Spaces/Green Gaps- The respondent is surprised by the small areas of green spaces that have been selected.</p> <p>The respondent states “Again on the individual sites chosen, we have no real comment to make, except that apart from its name, the Abbey Green is paved all over except for three trees and several planters. It is good they have included school playing fields in their listing.”</p> <p>The respondent states “On Green Gaps, we applaud what they are trying to do. This is an area where in our view the recent DaSA is not as comprehensive as it should be. However we query the validity of the London Road/Canadia ‘gap’.”</p> <p>The respondent states “Design Guidance - It should be helpful to have a design guide included, though logic would suggest it should then be given teeth in the Policy section: see last line in Policy HD 4 (‘DG... will be used as a reference to assess the impact.’).”</p>	<p>Noted and Policy HD2 has been amended accordingly.</p> <p>Green Spaces/Green Gaps- The local Green Spaces Analysis has carefully ensured that all three criteria of NPPF Para100 are met for each site listed.</p> <p>The Abbey Green is the historic local name for the area concerned despite it now being hard surfaced. We are pleased with your support for the inclusion of the school playing fields.</p> <p>We appreciate your support for the Green Gaps proposals. The inclusion of London Road / Canadia gap is explained in detail in the document “Green Gap / Strategic Gap Analysis” which is found on the Neighbourhood Plan website</p> <p>Policy HD4 amended to include the following: <i>The Design Guidelines document will become a mandatory source for the local planning authority to assess the impact of planning proposals</i> and this will be reflected in the revised policy statement.</p> <p>We disagree with this comment as page 34 needs to be read in conjunction with page 35 which shows outline</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
	5.4 Economy and Tourism 7. Community Aspirations	<p>The respondent states “We strongly dispute the reference in its page 34 to the upper example being ‘positive’ in terms of new additions. It is totally negative in the context of the building it is added to, unbalancing it absolutely.”</p> <p>5.4 Economy and Tourism The respondent states “Policies ET1 and ET2: These two policies are in the main repetitious and could easily be merged into one.”</p> <p>7. Community Aspirations- The respondent states “7.1.4 Section 1.1 cycleways should also be included. 7.1.4 Section 1.4 under Battle and Telham: “Safe routes” is not the correct terminology, but segregated routes.. Routes can be created by the removal of parking and/or installing shared use on footways.”</p>	<p>drawings to explain the text.</p> <p>5.4 Economy and Tourism- We note the respondent’s concerns but after due consideration, have decided to retain two separate policies, which have now been revised.</p> <p>7. Community Aspirations- On 7.1.4 Section 1.1: Thank you for your comments but it should be noted that cycleways are already included in Community Aspirations. On 7.1.4 Section 1.4 we cannot find any mention of ‘safe routes’ but we support the ways of making cycling safer.</p>
O-ANK-05	2.2 Community Engagement	<p>2.2 Community Engagement- The respondent states “Objective 2 for Battle & Telham to protect & encourage wildlife & the AONB’ There should be specific considerations for swifts and house martins as priority species. Swifts are declining in Battle and house martins virtually lost - these birds use to have significant populations in the area. Swifts have been in decline by 50% every 20 years, however this is rapidly increasing with some research showing 80% losses in recent years. Our local swift population needs protection and provision of new nesting sites by the inclusion of swift bricks & boxes.”</p>	<p>2.2 Community Engagement- Planning applications are frequently subject to ecological assessments.</p> <p>The Neighbourhood Plan has adopted the High Weald Housing Design Guide and policy DG10 on page 39 covers these aspects.</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
	5.1 Housing and Development	<p>5.1 Housing and Development-</p> <p>The respondent believes that policy HD4 should include mandatory inclusion of Swift Bricks and Boxes. The respondent also states "Provision for house martins should also apply as this too is a priority species"</p> <p>The respondent states "New Housing developments should also have a mandatory clause to provide hedgehog highways to connecting gardens, and a wildlife area with a pond and wildflower meadows. Ponds are fast disappearing from our landscape and are vital for numerous wildlife species from amphibians, insects, birds and mammals. Wildflower meadows also support insects and butterflies which in turn support birds and mammals."</p>	<p>5.1 Housing and Development-</p> <p>The steering group has asked the consultant to amend the policy to encourage Swift Bricks to be included where appropriate for new dwellings above 5m in height.</p> <p>The steering group is unable to make certain clauses mandatory as this would have to come via local planning laws. The requirement for green corridors for fauna is appropriately covered in Community Aspirations (section 7). With regards to ponds and other aspects of conservation, these are included in policy EN3.</p> <p>Battle Town Council are already committed to wild flower verges and meadows.</p>
	5.3 Environment	<p>5.3 Environment-</p> <p>The respondent states "Conservation of the Environment, Ecosystems & Biodiversity'</p> <p>This should consider the biodiversity of the town itself as well as the green spaces & the struggling swift and house martin colonies that have nested annually around Battle and it's town centre for centuries. Existing nest sites should be preserved and protected not just whilst nesting, but throughout the year as they are nest faithful. New developments or renovations should take these species into consideration both as priority species. Swift bricks/boxes, should be installed on every build and renovation where it is suitable to do so - height/facing aspects."</p>	<p>5.3 Environment-</p> <p>This is outside the remit of the Neighbourhood Plan as it can only influence future development and not retrospectively on the already built environment. Also see 5.1 above regarding swift bricks</p>
	5.4 Economy and Tourism	<p>5.4 Economy and Tourism</p> <p>The respondent states "The local swift population should be protected & enhances by provision of the swift bricks and boxes as</p>	<p>5.4 Economy and Tourism</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		they are a draw for tourists in the summer months. The swift is an iconic species associated with the town of Battle and Sussex."	We have no evidence available to us to support the respondent's claims.
O-ANK-06	Comments on other documents	<p>Comments on other documents-</p> <p>The respondent states "We would like to see Policy EN3 include "buildings-based biodiversity, such as swifts and house martins" National Planning Policy Guidance (NPPG) Natural Environment July 2019 states:</p> <p>"Relatively small features can often achieve important benefits for wildlife, such as incorporating 'swift bricks' and bat boxes in developments,"</p> <p>(Paragraph: 023 Reference ID: 8-023-20190721 - https://www.gov.uk/guidance/natural-environment),</p> <p>We would like to see this guidance included in the Battle Neighbourhood Plan, especially as the historic nature of the town and long-term integration of biodiversity within the fabric of the buildings, means that it is particularly relevant."</p> <p>The respondent refers to the Islington Local Plan which emphasises the importance of the buildings-based biodiversity which is so important to a historic town such as Battle.</p> <p>The respondent also refers to the Chartered Institute of Ecology and Environmental Management (CIEEM) which provides detailed guidance.</p> <p>The respondent provides detail from CIEEM about use of swift bricks.</p>	<p>Comments on other documents-</p> <p>The steering group has asked the consultant to amend the policy to encourage Swift Bricks to be included where appropriate for new dwellings above 5m in height, however policy EN3 is deliberately constructed to take a wide view on environment ecosystems and biodiversity to accord with the nature of the Civil Parish.</p> <p>Planning applications are frequently subject to ecological assessments.</p> <p>The Neighbourhood Plan has adopted the High Weald Housing Design Guide and policy DG10 on page 39 covers these aspects.</p> <p>See 'comments on other documents' above regarding swift bricks.</p>
O-OTA-05	Comments on other documents	<p>Comments on other documents-</p> <p>The respondent states "I have read most of the long document and appreciate all the effort and time people have put in to produce it"</p>	<p>Comments on other documents-</p> <p>Thank you for your supportive comments.</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		<p>The respondent states "I don't think it emphasizes the problems of disabled people and access through out the plan and these need to be addressed. The High Street is full of hazards and most shops and premises have steps and are not accessible, its a shocking problem, this needs to be addressed in the plan."</p> <p>The respondent considers that the Climate Emergency that we face should be at the heart of the plan.</p> <p>The respondent states: "As a nearby resident I am alarmed at the loss of a greenfield site to be earmarked for housing BA31 It is not a 'brownfield site' as stated in the plan." The respondent also has concerns about protection of rare species, access roads to the site, and the junction with Hastings Road</p> <p>The respondent states: "I agree with HD3 and HD4 on mix, quality design and sustainability as there is a need for good quality social housing, any new site should concentrate on affordability."</p> <p>The respondent states: "I don't think the unspoilt wildlife haven of Glengorse should be despoiled though, there must be more</p>	<p>We understand the respondent's concerns but regret the High Street is not within the remit of the Neighbourhood Plan, which is focussed on new builds. We have emphasised meeting the needs of those with disabilities in our policy HD3 'Housing Mix'. The Battle Civil Parish Design Guidelines highlight the need for safety and accessibility for vulnerable groups.</p> <p>Battle Town Council have already agreed to work towards becoming carbon neutral by 2030. We would also refer the respondent to page 40 of the Battle Civil Parish Design Guidelines which deals with energy efficiency.</p> <p>Regarding Telham Court, the house, the southern playing field and the remainder of the grounds have been included in the Local Heritage Listing and will not be included in the Neighbourhood Plan's proposed development sites. Materials access will be dealt with in any future planning application by RDC. Our understanding is that the ESCC Highways safety audit does not indicate a high risk.</p> <p>Thank you for your supportive comments concerning policies HD3 and HD4.</p> <p>The steering group met Rother Investment owners of Telham Court and they have clarified that they wish to</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		suitable sites and places, proper brownfield sites that could be used for helping with the social housing crisis."	remain private for business purposes. The house and most of the grounds have been included in the Local Heritage Listing and will not be included in the Neighbourhood Plan's proposed development sites.
O-0TG-14	Comments on other documents	Comments on other documents: The respondent shows photographs concerning surface water and flooding with respect to BANS118	Comments on other documents: The Loose Farm Site BANS118 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15.
H-9QE-02	5.1 Housing & Development 5.2 Infrastructure	5.1 Housing & Development The respondent states: "I have no objections to the building of some housing in the Darvel Down area as adequate housing is needed in the area. However the building of 68 houses in this small area concerns me. Darvel Down has 120 houses..." The respondent has concerns about the road system on Darvel Down and the site with planning permission Darvel Down /2019/921/P and Darvel Down /2017/2305/P. The respondent also states "This would create chaos!!! The ideal way would be connect all <u>3</u> sites and have perhaps 2 entrances from B2096(using Swallow Barn and Whitehouse Farm." 5.2 Infrastructure The respondent has concerns and provides details on: - Infrastructure (clean water) - waste water - electricity supplied	There are 2 sites being put forward by the Neighbourhood Plan, NENS102 (White House Poultry Farm) and NENS05ar (Swallow Barn) A third site NE01 already has planning permission granted by RDC (RR/2019/921/P and RR/2017/2308/P) The Neighbourhood Plan currently being consulted will only be for a maximum of up to 23 dwellings (not 68 as alleged) but the site with planning permission is for 25 dwellings.Following discussions with RDC planning and ESCC Highways, the steering group have been in contact with developer / landowners regarding NE01 (RR/2019/921/P) and NE05ar (Swallow Barn) having the possibility of a shared access onto the B2096 5.2 Infrastructure Clean/Waste water and Electricity - Whilst this is not within the remit of the

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
	7. Community Aspirations	<p>7. Community Aspirations</p> <p>The respondent has concerns about the following:</p> <ul style="list-style-type: none"> -bus service -telephone system/broadband -doctors surgery 	<p>Neighbourhood Plan the concerns about utility services will be dealt with at planning application stage. Nevertheless these matters are noted in the Community Aspirations</p> <p>7. Community Aspirations -</p> <ul style="list-style-type: none"> - Public transport is not within the Neighbourhood Plan remit but is considered under Community Aspirations in Regulation 14 document. - There is a concern about the telephone system/broadband and this is referred to in Community Aspirations. - GP Surgery provision is outside the NP remit; however, residents' wishes are included in the Community Aspirations.
H-9QB-03	5.1 Housing and Development	<p>5.1 Housing and Development</p> <p>The respondent states: "If 23 houses are required in Netherfield then the preferred site of White House Poultry Farm is the better option because of Green space and lesser impact on the environment."</p> <p>The respondent also has concerns about saving our green spaces and wildlife</p>	<p>5.1 Housing and Development</p> <p>The Neighbourhood Plan has to provide for 48 dwellings in Netherfield of which 25 are provided by granted planning permission (RR/2019/921/P). The residual requirement of 23 dwellings will be met by the other sites proposed by the plan, which are White House Poultry Farm (NENS102) and Swallow Barn (NE05ar).</p>
<p>O-ANK-10</p> <p>O-ANK-11</p> <p>O-ANK-12</p> <p>O-ANK-13</p> <p>O-ANK-14</p>	(via email)	<p>The respondent comments summary which follows is derived from 5 separately submitted responses from the same individual</p> <p>The respondent has concerns about the way in which respondents are requested to only feed back via the Neighbourhood Plan pro-forma response form.</p>	<p>SG responses following are in respect of 5 separate consultation responses from the same individual</p> <p>As soon as this was brought to our attention and following further advice from RDC and our external consultant, the methods of responding were opened up to any free-form text responses.</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		<p>The respondent states "The Steering Group's reluctance to engage with the people of Netherfield has been a source of deep concern and trying to "bulldoze" your vision through the process, when the whole essence is meant to be one of a shared vision is extremely unhelpful."</p> <p>The respondent states "You are, it appears, trying to deny people who have learning difficulties and would struggle to complete the form, those that are overawed by the complexity of the form and generally those that are seeking to make it a simple process to express their concerns, from voting."</p>	<p>We believe we have had sufficient engagement with the community via public consultations, drop-in sessions, Parish Assemblies, Parish newsletters, newspapers, and social media.</p> <p>The steering group, which at the time included Netherfield representatives, were advised by their newly appointed external consultant to review the vision and objectives in January 2018. The vision statement was subsequently drafted and circulated by the chairman via email on 5th February 2018 followed on the 17th February with the draft objectives.</p> <p>The steering group strongly objects to the wholly inappropriate language used here by the respondent.</p> <p>Individuals were able to respond in free-text both on the form and on the website from the outset of the consultation period.</p>
O-ANK-11	(by email)	<p>The respondent states that at the time of writing he was still waiting for a response to his complaint on 3rd December 2019 (sent to the chairman's personal email account)</p> <p>The respondent complains that there was a lack of engagement with Netherfield residents.</p> <p>The respondent states "In fact, when the problems on your vision were highlighted at the Hall meeting on Thursday, even some of</p>	<p>The respondent received a full response from the chair of the steering group in writing, from the official Neighbourhood Plan email address on the 10th December 2019.</p> <p>We believe we have had sufficient engagement with the community via public consultations, drop-in sessions, Parish Assemblies, Parish newsletters, newspapers, and social media.</p> <p>The respondent is referring to a response to a leading question made to one member of the steering group</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		<p>your own "volunteers" stated that they would not want to live in the village, in the developments you are proposing"</p> <p>The respondent criticises a leaflet that was delivered by hand to residents of Netherfield during the Regulation 14 consultation period.</p> <p>The respondent is criticising his perceived lack of engagement with Netherfield residents.</p> <p>The respondent welcomes the changes made to allow feedback/comments in any written format.</p> <p>The respondent has concerns regarding infrastructure, over-subscribed schools, lack of pavements and cycle tracks, utility infrastructure problems, employment, and destruction of historical character.</p> <p>The respondent once again questions his perceived lack of</p>	<p>during an informal Q&A discussion and did not and still does not reflect the thoughts of the steering group as a whole.</p> <p>As a direct result of the Netherfield meeting the steering group produced an informative leaflet to enhance its consultation with Netherfield residents and delivered it within a few days of the meeting to address perceived misunderstandings.</p> <p>As soon as this was brought to our attention and following further advice from RDC and our external consultant, the methods of responding were opened up to any free-form text responses.</p> <p>Many infrastructure issues fall outside the main remit of a Neighbourhood Plan, but are included in Community Aspirations. Public transport is not within the Neighbourhood Plan remit but is considered under Community Aspirations in Regulation 14 document. Schools are outside of the NP remit. However, the ESCC Director of Childrens Services states that <i>"Our latest forecasts indicate there should be sufficient early years, primary and secondary school places in both Battle and Netherfield over the Neighbourhood Plan Period to meet the predicted demand for places"</i> The Neighbourhood Plan does not necessitate the destruction of historical character.</p> <p>We believe we have had sufficient engagement with</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		engagement with Netherfield residents.	the community via public consultations, drop-in sessions, Parish Assemblies, Parish newsletters, newspapers, and social media. The steering group, which at the time included Netherfield representatives, were advised by their newly appointed external consultant to review the vision and objectives in January 2018. The vision statement was subsequently drafted and circulated by the chairman via email on 5 th February 2018 followed on the 17 th February with the draft objectives.
		The respondent highlights the restrictions on Community Infrastructure Levy (CIL) spending and states "Infrastructure such as water and electricity would be the sole responsibility of the utilities, the roads are down to the highways authority and buses would be a joint venture between the authority and the bus company"	We agree with the respondent assertion that there are restrictions on CIL spending, but it could be used for example on a number of the Community Aspirations shown in section 7 subject to bids by local ward councillors for funding from the CIL money delivered to Battle Town Council by RDC. For example the introduction of a "drop-in" health centre in the village.
		The respondent quotes from the distributed NP leaflet that "the NP Steering Group who may make changes" and continues, "does not provide the residents with any guarantee that whatever is said will change the proposed plan"	The leaflet was distributed solely to engage with Netherfield residents to address various misunderstandings made at the Netherfield village hall meeting, set up by the respondent which, members of the steering group attended. This response document provides evidence of the changes both major and minor which have been made to the Neighbourhood Plan as a result of the Regulation14 consultation.
		The respondent states "I trust that you will address these concerns	The request to address these concerns within a few

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		<p>by Wednesday of this week as I will be delivering a copy of this statement to the entire Village of Netherfield shortly, in order that the community can assess matters in time for the referendum.</p> <p>The statement below is repeated 4 times by the respondent in this email: "Netherfield is not saying we do not want development. Netherfield is saying come and talk to us so we can reach a joint approach."</p>	<p>days was made during the consultation period and it was not permissible to respond to individual comments during the six week period. The steering group response forms part of the consultation review undertaken herein.</p> <p>The respondent repeatedly makes assertions about lack of engagement with Netherfield residents, here and above with this comment in bold. We believe we have had sufficient engagement with the community in Netherfield having had two drop-in sessions, attendance at the village hall meeting, and extensive conversations with residents. In addition the steering group have reached out to the community through parish newsletters, monthly newspaper articles, and social media. It should be noted that the steering group has undertaken more research about Netherfield than other areas within the civil parish due to the perceived special village character.</p>
O-ANK-12	(by email)	The respondent complains about the process of the Neighbourhood Plan and not it's content in particular the lack of response, and states "Therefore, I am concerned that you have withheld a response despite acknowledging that a complaint exists. Given the fact that you have not answered anything to date in the appropriate timescales, or, as far as I am concerned, in a manner which reflects the regulatory protocols, I believe I have been extremely patient. That patience is not open-ended"	<p>The complaint was received through a private email address despite requests to use the public Neighbourhood Plan email address.</p> <p>A response was made by the chairman through the official Neighbourhood Plan email address on 10th December 2019 which was prior to the consultation period. Therefore this email addressed the respondent's request in a timely manner</p>
O-ANK-13	(by email)	<p>The respondent confirms that he alone received and delivered completed Netherfield pro-formas to Battle Town Council.</p> <p>The respondent states "To clarify, these response forms raised issues created by the "proposed plan" numbered 1-10 and all are to</p>	By personally collecting and receiving what should have been confidential feedback forms, the respondent is clearly in breach of General Data Protection Regulations (GDPR).

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		<p>be taken as relative, whether ticked or unticked"</p> <p>The respondent states that "I have also been requested to provide an additional comment by (name redacted by steering group) whose form was included in my first batch"</p> <p>The respondent is questioning the ownership of NE GS04. The context is questioning the meaning of policy EN1 where it states "very special circumstances" in respect of Local Green Spaces specifically NE GS04</p> <p>The respondent states "It should also have been noted in the Proposed Plan that the Hall wishes to try again for Medical Facilities along the lines of Catsfield, and that this would not have been a Steering Group initiative, as it has been on-going since the the previous attempt failed. I trust that you will address these issues"</p>	<p>It was not made clear on the Netherfield specific pro-forma whether or not ticks should be used to indicate preferences but irrespective of this lack of clarity an analysis has been undertaken in the Netherfield questionnaire responses section which follows later in this document below.</p> <p>The steering group cannot accept comments made via a third party without confirmation that there is agreement for this to happen. Notwithstanding this the respondent copied in numerous people to this emailed response and is clearly once again in breach of GDPR</p> <p>The ownership of the land NE GS04 was not held by RDC but ongoing investigations are being made by the steering group with the trustees of Netherfield Village Hall.</p> <p>The policy EN1 is under review.</p> <p>The steering group has never claimed that this was their initiative. The steering group has used the views expressed in the April 2016 AiRS survey which highlighted the need for improvement of medical facilities throughout the civil parish. The steering group has been listening to the wishes of Netherfield residents and has included a part-time doctors surgery in the Community Aspirations prior to the consultation.</p>
O-ANK-14	(by email)	The respondent states "Unfortunately, despite attending the Almonry postbox as the gate wasn't open, so I could not deliver the envelope with the 3 forms from the (family name redacted by the	By personally collecting and receiving what should have been confidential feedback forms, the respondent is clearly in breach of General Data

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		steering group) family. However, I went back to the Netherfield Village Shop and deposited the envelope in the Battle Neighbourhood Plan box. (name redacted by the steering group) asked me to enquire when somebody from the Steering Group will be collecting the box as she closes at 12.00 c'clock lunchtime today"	Protection Regulations (GDPR).

Developers / Site Owners

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
O-OJR-01 O-OJR-02 O-OJR-03	5.1 Housing & Development (O-OJR-01)	<p>The respondent comments summary which follows is derived from 3 separately submitted responses from the <i>same</i> individual.</p> <p>5.1 Housing and Development -Justification for allocating Caldbec Hill BA36a</p> <p>5.1 Housing & Development - BA19 – Requests inclusion of Hughs Field in NP and BA19a</p> <p>BAGS05 – Objection to inclusion as a green space</p> <p>Comment on maps – Request that final version of NP includes earlier versions of printed key maps</p>	<p>SG responses following are in respect of 3 separate consultation responses from the <i>same</i> individual</p> <p>5.1 Housing and Development - BA36a Agree with allocation of up to 9 dwellings</p> <p>5.1 Housing & Development - BA19 (including BA19a) is not included in the Neighbourhood Plan as it was not taken forward by AECOM as a site for development. The decision on Hughs Field was subsequently justified by the LPAs refusal for planning. (Planning reference RR/2019/2126/P)</p> <p>BAGS05 in ownership of ESCC and they have agreed to it as Green Space.</p> <p>Comment on maps - This may lead to confusion and initial maps were incorrect. Local Green Spaces maps will be amended along with associated text</p>
	1. Introduction (O-OJR-02)	Priorities – Nominating green space to north and east of the old Deanery	Priorities – The National Trust have agreed to the Local Green Space designation

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	2.2 Community Engagement (O-0JR-02)	Concerns about parking and traffic	Parking is not in the remit of the Neighbourhood Plan, however there are four pay-and-display car parks within the town. Civil Parking Enforcement (CPE) is scheduled to be introduced in 2020, which will improve the flow of traffic through the town and reduce illegal parking.
	5.1 Housing & Development (O-0JR-02)	Access to the downside railway station platform and congestion on Station Road	Representations have been made to Network Rail, Southeastern and DfT for funding of the "access for all" project. Station Road is owned by Network Rail and is outside of the NP remit.
	5.1 Housing and Development (O-0JR-03)	BANS110 (Site 2, Field north of Upper Lake and St.Marys Church) or BANS111 (Site 3a, Field north of Cherry Gardens allotments and east of Caldbec Hill) - Concerns about the above sites. Respondent has made a correction to site number references 110 and 111, which should have been BANS117, Cherry Gardens BA36a/BA36 – Queries regarding public transport	BANS110 or BANS111 – These sites were not included in the Regulation 14 document The Cherry Gardens site (BANS117) will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15. BA36a/BA36 Scored Amber regarding public transport on Site Assessment to reflect the need to cross over the road twice to use the footway to the bus stop.
	5.3 Environment (O-0JR-02)	5.3 Environment - Objecting to the Compulsory Purchase Order (CPO) in 1974 of Green Space opposite Caldbec House. Now supportive of wild flower meadow Request to change naming of green space	5.3 Environment (GS05) - No change required. No change required

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
	Comment on other documents (O-0JR-03)	<p>Further objections to CPO by ESCC and historic description of use for parking of the site</p> <p>BAGS27 – Concerns about Caldbec Hill arboretum (BAGS27)</p> <p>Site scoring spreadsheets – Reference made to heritage issues and a lack of provenance for various claims, for instance Profession Field(<i>sic</i>), Time Team TV special, axe head, bus stop, old dog license, and density of housing.</p> <p>Record of meetings with developers – Respondent was unable to attend meetings</p> <p>Concerns about conflicts of interest</p> <p>Concerns about communications strategy and how representatives of the steering group were appointed</p>	<p>No change required</p> <p>BAGS27 was removed at the landowner's request from the Green Spaces analysis. This Green Space was not included in the Regulation14 consultation.</p> <p>Site scoring spreadsheets – The site scoring spreadsheets were undertaken with due diligence and included heritage issues. The Heritage Charter Group of Battle Town Council has surveyed the whole parish for undesigned assets.</p> <p>Record of meetings with developers – The respondent could not attend and did not choose to send a representative. The external consultant received from the respondent a full account of the responses to the pro-forma questions asked at the meeting.</p> <p>The process conformed to data protection regulations and declarations of interest were and are still available to view from Battle Town Council on request.</p> <p>Communications Strategy - Battle Town Council established the steering group terms of reference to advise them on the formulation of the Neighbourhood Plan. Some members were Battle Town Council appointees but most were volunteers from within the community. The Neighbourhood Plan was</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
			scrutinised, subsequently adopted and endorsed by Battle Town Council.
O-4QU-01 and O-4QU-02 (01 was received via the website questionnaire and merely stated that 02 would be send via email, as the web page did not permit attachments)	5.1 Housing & Development	Draft Policy EN1 – Local Green Space a) Concerns about Local Green Space b) Exclusion of NE02 from the Neighbourhood Plan	Draft Policy EN1 – Local Green Space a) the proposed LGS designations meets the criteria set in the NPPF and reflects the community engagement undertaken as part of the development of the Plan b) Site NE02: There were two planning applications: RR/2016/2722/P dated 18/10/2016, refused by notice on 09/02/2017. RR/2017/1146/P dated 14/05/2017, refused by notice on 21/08/2017 Two appeals (APP/U1430/W/17/3177298 and APP/U1430/W/17/3188117) were lodged on 03/07/2018 and were dismissed on 17/08/2018 Independent of these planning decisions the site was not shortlisted by AECOM.
O-9HA-01	5.1 Housing & Development	5.1 Housing & Development - Welcomes the inclusion of Cherry Gardens (BANS117) HD2 policy wording questioned Priority order questioned NPPF technical issue on housing numbers	5.1 Housing & Development The Cherry Gardens site (BANS117) will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15. Policy HD2 amended for clarity and the use of reserved sites priority list removed. The use of reserved sites and priority order are no longer being used

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		Completion of Blackfriars being completed within the timeframe	<p>In planning policy, housing numbers are always minimums so for clarity this will be emphasised. The housing number allocated has been through examination as part of the RDC numbers and the supporting text for the policy explains the background behind the numbers. Para 104 goes on to explain that <i>where the figure is set in strategic policies, this figure will not need retesting at examination of the neighbourhood plan.</i></p> <p>In consultation with RDC the agreed figure of 475 from the strategic policies will need to be met through the Plan and the distribution approach and updated policy wording has been agreed by RDC.</p> <p>Whilst the guidance also state <i>A neighbourhood plan can allocate additional sites to those in a local plan (or spatial development strategy) where this is supported by evidence to demonstrate need above that identified in the local plan or spatial development strategy.</i></p> <p>There is no evidence to suggest that more housing is needed so the Plan needs to address the parish housing allocation given by RDC to be in general conformity with the strategic policies.</p> <p>The Neighbourhood Plan is responding to the Rother District Council allocated numbers</p>
O-0TX-07	5.1 Housing & Development	5.1 Housing & Development a), b), d) and e) – Wishing to extend the boundary of BA31a	5.1 Housing & Development a), b), d) and e) - The steering group are responding to the wishes of the community in the AiRS survey which indicated a preference for individual developments to be up to 20 dwellings.

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		<p>c) Questioning priority order and reserves sites</p> <p>P36 of SEA – Query on number at Blackfriars</p> <p>The respondent raised a number of questions 1) to 4) concerning the possibility of a shortfall from 220 dwellings in Blackfriars and how this might be accommodated in Glengorse</p>	<p>The proposed extension falls under land which has been identified for Local Heritage Listing.</p> <p>c) Priority order and reserved sites are no longer used in the revised plan.</p> <p>P36 of SEA – RDC have advised and the planning application RR/2019/604/P indicates, that up to 220 dwellings will be built at Blackfriars</p> <p>Questions 1 to 4 – The purpose of the Neighbourhood Plan is to allocate sites which are deliverable within the timescale of the NP.</p>
O-OTG-13		<p>Respondent makes the case for inclusion of Loose Farm.</p> <p>Respondent indicates an error in the Historic England listing of Cedarwood Care Home and 4 Loose Farm cottage</p>	<p>The Loose Farm Site BANS118 will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15.</p> <p>Thank you for pointing out errors in Historic England and AECOM documentation. The listing of Cedarwood Care Home has been removed by the Heritage Charter Working Group and being submitted to full Council BTC for endorsement .</p>
O-ANK-07		<p>Swallow Barn, NE05a and NE05r – Concerns about details related to the Neighbourhood Plan contained in Para1-22 of this agent's response.</p> <p>Para13– Access to B2096</p>	<p>Swallow Barn - we can confirm that NE05a and NE05r are both included in the Neighbourhood Plan for development of up to 9 dwellings.</p> <p>Para13 - ESCC Highways have responded positively to a shared access onto the B2096 for NE01, NE05a and NE05r and this is supported by RDC.</p>

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O-0FR-01		Concerns about Sunnyrise site (BA3) not being included	Sunnyrise site BA3 was not included in the Regulation 14 Neighbourhood Plan due to the "technical difficulties" which remain unresolved.
O-0RB-01		Submitting a site in Marley Lane for potential development	Received outside of the second and final Call for Sites date, which ended on 14/04/2018

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O-9HA-02	Comments on any other documents	<p>The respondent welcomes the inclusion of Cherry Gardens site (BANS117)</p> <p>Respondent raises concerns about the priority order-based approach set out in Policy HD2</p> <p>The respondent has concerns about only minimum targets being addressed.</p> <p>Respondent states "In order for Policy HD2 to pass the four tests of "soundness" as set out in the NPPF (to be positively prepared, to be justified, to be effective and to be consistent with national policy) the policy should be redrafted to this effect"</p>	<p>The Cherry Gardens site (BANS117) will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15.</p> <p>Going forward to Regulation 15 and 16 the priority order is no longer being used.</p> <p>Paragraph 29 of the National Planning Policy Framework states that neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.</p> <p>The National Planning Policy Framework expects most strategic policy-making authorities to set housing requirement figures for designated neighbourhood areas as part of their strategic policies.</p> <p>The planning practice guidance – neighbourhood planning section para. 103 makes it clear that <i>Where neighbourhood planning bodies intend to exceed their housing requirement figure, proactive engagement with their local planning authority can help to assess whether the scale of additional housing numbers is considered to be in general</i></p>

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		Respondent states "Finally, it is important to acknowledge that there is a very real possibility that the Blackfriars site	<p><i>conformity with the strategic policies.</i> For example, whether the scale of proposed increase has a detrimental impact on the strategic spatial strategy, or whether sufficient infrastructure is proposed to support the scale of development and whether it has a realistic prospect of being delivered in accordance with development plan policies on viability. Any neighbourhood plan policies on the size or type of housing required will need to be informed by the evidence prepared to support relevant strategic policies, supplemented where necessary by locally-produced information.</p> <p>Para 104 of the planning practice guidance goes on to explain that <i>where the figure is set in strategic policies, this figure will not need retesting at examination of the neighbourhood plan.</i></p> <p>In consultation with RDC the agreed figure of 475 from the strategic policies will need to be met through the Plan and the distribution approach and updated policy wording has been agreed by RDC.</p> <p>Whilst the guidance also state <i>A neighbourhood plan can allocate additional sites to those in a local plan (or spatial development strategy) where this is supported by evidence to demonstrate need above that identified in the local plan or spatial development strategy.</i></p> <p>There is no evidence to suggest that more housing is needed so the Plan needs to address the parish housing allocation given by RDC to be in general conformity with the strategic policies.</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		may not be completed by 2028 (over the timeframe of the plan period)"	The steering group has been liaising with RDC as required. RDC has advised the steering group that the Blackfriars development will be progressed.
O-0HS-02	Comments on any other documents	<p>The respondent summarises many of the policy statements in the Neighbourhood Plan and then states "The Site reference: BA18: Land at Almonry Farm (South) North Trade Road is not included in the BCPNP proposed site allocations following the assessment made in the AECOM Site Assessment Report which concluded that the Site is located in a wholly rural setting, partly within and adjacent to Ancient and Semi-Natural and Wet Woodland and multiple historic field boundaries across the site. The report therefore agrees with the SHLAA (2013) conclusions that the Site is not suitable for development. We don't agree and set out later why this site could be allocated now so the Neighbourhood Plan meets the basic conditions and also provides a contingency should other sites not come forward"</p> <p>The respondent makes comparative statements concerning site BA18 (Almonry Farm) and national and local planning policies and alleges that the Neighbourhood Plan will not meet the minimum housing targets within the DaSA.</p> <p>Concerning the Blackfriars site the respondent states "Homes England have recently confirmed that they will provide a significant sum of money to contribute to the delivery of this spine road. However, it is unclear whether this money will fill the infrastructure costs gap, whether the</p>	<p>Following the independent assessment by AECOM the Almonry Farm (South) site (BA18) was not included in the Neighbourhood Plan.</p> <p>RDC are content with the allocation of 475 dwellings within Battle and Telham and the 48 dwelling allocation in Netherfield, which stands alongside the DaSA (Development and Site Allocation document) covering sites for the rest of Rother. The plan is therefore in general conformity with this strategic policy.</p> <p>RDC has advised the steering group that the Blackfriars development will be progressed. Any infrastructure deficit issues to deliver roads will be addressed as part of the planning application process.</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		<p>road can be delivered, and indeed, whether the homes can be delivered"</p> <p>The respondent states "Our review of the eight sites proposed for allocation in the emerging Plan demonstrates that the majority are unsuitable and/or undeliverable"</p>	<p>Since the respondent wrote, the Government has awarded to RDC approx £6m for development of a spine road at Blackfriars (RR/2019/604/P) and compulsory purchase of some land in order that RDC can bring this site into occupation</p> <p>The steering group completely disagrees with this view and all sites were independently assessed by AECOM, which is a Government approved body for this specific purpose.</p>
O-OLL-01	Comments on other documents	<p>The respondent proposes additional development on the Beech Estate and supports their case by reference to the DaSA, policy HD2</p> <p>Housing delivery targets will be out of date, for example the Blackfriars site</p>	<p>The plan is in general conformity with the strategic policies. Para 104 of the planning practice guidance goes on to explain that <i>where the figure is set in strategic policies, this figure will not need retesting at examination of the neighbourhood plan.</i></p> <p>In consultation with RDC the agreed figure of 475 from the strategic policies will need to be met through the Plan and the distribution approach and updated policy wording has been agreed by RDC.</p> <p>Whilst the guidance also state <i>A neighbourhood plan can allocate additional sites to those in a local plan (or spatial development strategy) where this is supported by evidence to demonstrate need above that identified in the local plan or spatial development strategy.</i></p> <p>There is no evidence to suggest that more housing is needed so the Plan needs to address the parish housing allocation given by RDC to be in general conformity with the strategic policies.</p> <p>Since the respondent wrote, the Government has awarded to RDC approx £6m for development of a spine road at Blackfriars</p>

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		<p>Respondent raises a second point on a failed historic S106 agreement</p> <p>The respondent criticises the RDC officer report on the planning application and constraints to deliver the road.</p> <p>The respondent questions the validity of the Blackfriars site and viability of including it in the Neighbourhood Plan.</p> <p>Respondent comments on the utility of the SHLAA, it's assessment by AECOM and changed NPPF requirements, also that AECOM did not deviate from SHLAA assessments.</p> <p>The respondent states that BANS118 (Loose Farm) and BANS103 (Marley Lane) are remote from the town centre.</p> <p>Respondent makes the case for infill development within the development boundary and suggests that "The Neighbourhood Plan clearly does not expect to allocate all</p>	<p>(RR/2019/604/P) and compulsory purchase of some land in order that RDC can bring this site into occupation.</p> <p>Section 106 will be addressed as part of the planning application process. Since the respondent wrote, the Government has awarded to RDC approx £6m for development of a spine road at Blackfriars (RR/2019/604/P) and compulsory purchase of some land in order that RDC can bring this site into occupation.</p> <p>This is not the remit of the NDP and is an issue for RDC.</p> <p>RDC has advised the steering group that the Blackfriars development will be progressed and therefore, its inclusion is valid.</p> <p>AECOM independently assessed the sites and came to different conclusions from the SHLAA on occasions.</p> <p>Following the consultation, both BANS118 (Loose Farm) and BANS103 (Marley Lane) will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15</p> <p>The Neighbourhood Plan allocates the number of dwellings for potential development in accordance with the numbers required by RDC and confirmed by them.</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		<p>sites for development within Battle but expects other sites to come forward independent of the Neighbourhood Plan”</p> <p>The respondent proposes an extension to the development boundary to include additional land within Beech Estate with the planning reference RR/2018/2666/P and land adjacent to Whitelands on the North Trade Road</p> <p>Green Gaps - The respondent comments on Policy HD8 and RDC Core Policy: “The policy as written does not seeks to prevent development outright but requires development to accord with criteria including preventing the coalescence of settlements. This policy is considered to be unnecessary on a number of counts”.</p> <p>The respondent references a number of specific points about Green Gaps around the parish and relates them to the development boundary concluding that other proposed development sites may be more appropriate.</p>	<p>No extensions to the development boundary were proposed for BANS118 (Loose Farm) and BANS103 (Marley Lane). Site will not be included in the Neighbourhood Plan Proposal Submission to RDC for Regulation 15</p> <p>Furthermore the steering group felt it important to protect the wooded land within the Beech Estate.</p> <p>The development boundary has not been extended to protect the land fronting North Trade Road, which limits the urban street scene and discourages further ribbon development.</p> <p>Green Gaps - Noted. The policy HD8 is clear on the difference between Strategic Gaps and Green Gaps.</p> <p>The Neighbourhood Plan Green Gaps proposals were developed after the RDC DaSA was made in 2019 to take account of significant changes introduced at that time. We were advised by RDC that development in Green Gaps could be considered in exceptional circumstances. We have taken the holistic view of Green Gaps and the development boundary to ensure the high quality green urban realm is maintained, particularly to the west of the town.</p>

ID	'Area' of feedback	Summary of issues and concerns	Steering Group recommended response
		The respondent concludes by proposing the inclusion of two sites to the west of the current development boundary, namely: adjacent to Thatcher Place, and adjacent to Whitelands.	Neither of the sites (adjacent to Thatcher Place and adjacent to Whitelands) were proposed or put forward in any of the Call For Sites (the final Call For Sites closed on 14 th April 2018) and therefore cannot be considered. Indeed the planning application for the site adjacent to Frederick Thatcher Place (RR/2019/2845/P) was refused by RDC on 11/05/2020 on grounds that strongly support the Neighbourhood Plan development boundary decisions.

Netherfield local questionnaire

Summary and Response

Executive Summary of independent questionnaire circulated by a Netherfield resident

- Assertions are made by Maurice Holmes in his pro-forma text using references to the Proposed Plan.
- The questionnaire was designed to be completed by placing an X against the numbered paragraphs, without the necessity to read the Regulation 14 consultation documents.
- The Netherfield pro-forma was presented at a public meeting called by Maurice Holmes, claiming to be simpler than using the Neighbourhood Plan response form (available on-line and in hard copy).
- The majority of the completed Netherfield pro-formas were collected and delivered to Battle Town Council by Maurice Holmes, without appropriate GDPR safeguards for confidentiality. It should be noted that any forms lodged in the consultation box at Netherfield were collected under 'dual-control' by members of the Steering Group, who delivered them to the Almonry safe for subsequent analysis following Battle Town Council GDPR guidelines.
- The pro-formas were completed by a total of 50 people.
 - 22 pro-formas were ticked for each of the 10 statements
 - 28 pro-formas were un-ticked. (One of the un-ticked pro-formas had comments on section 4, 7, and 9; see below for details)
- Of the 50 pro-formas received:
 - 5 completed forms were received from the occupants at one address (5 forms)
 - 4 completed forms were received from the occupants at one address (4 forms)
 - 3 completed forms were received from the occupants at three separate addresses (9 forms)
 - 2 people from each of 10 separate addresses completed the forms (20 forms)
 - 12 were completed by individuals at separate addresses (12 forms)
- Therefore it should be noted that 36% of the responses using the form created by Maurice Holmes came from only 5 addresses

not used	Question number	Pro-forma text written and supplied to residents by Maurice Holmes, who is a Netherfield resident	Summary	Steering Group Response
		Name: Date Address: Battle Neighbourhood Plan – Netherfield Section – Feedback Form. The Proposed Plan (PP) does not meet my requirements for balanced and sustainable change or growth within the Battle Parish because:		
	1	There has been no recent consultation with any Netherfield residents on any of PP Sections 1-7 , contrary to Schedule 9 Part 1 Section 61E(10)(g). Majority of residents do not use website, Facebook, read local press or town council newsletter (which is irregular), no leaflets, meetings or forums, as advocated by Locality . No rep on BNPSG. No shared vision as advocated under PP 1.1.4 as no consultation as expounded under PP 2.2.1	Asserts that no consultation with “any Netherfield” residents.	There has been ample recent consultation with the residents of Netherfield, Battle and Telham which included delivery of leaflets by Royal Mail to all households in the Parish. In addition a leaflet drop was made to most households in Netherfield on 22 nd February 2020. Members of the Steering Group attended a public meeting in Netherfield, held on 20 th February 2020. Two drop-in sessions were held in Netherfield and two in Battle during the Regulation14 consultation period. In May 2019 Maurice Holmes the former chair of the Steering Group joined Battle Town Council for the

not used	Question number	Pro-forma text written and supplied to residents by Maurice Holmes, who is a Netherfield resident	Summary	Steering Group Response
				<p>Netherfield Ward. He did not raise concerns about Netherfield's Neighbourhood Plan issues or volunteer to re-join the Steering Group as an additional Council representative.</p> <p>Throughout the formative years of the plan there have been five Netherfield residents on the Neighbourhood Plan Steering Group, one of whom was the Secretary, and one (Maurice Holmes) was the Chairman; during this time there was ample opportunity for him to engage with Netherfield residents. The Vision and Objectives and appointment of the current external consultant were made under his Chairmanship.</p> <p>In addition and at other times, there have been three Battle Town Councillors representing the Netherfield Ward, two of which sat on the NP Steering Group. Details can be found on the NP website.</p>

not used	Question number	Pro-forma text written and supplied to residents by Maurice Holmes, who is a Netherfield resident	Summary	Steering Group Response
				When these representatives left and despite publicity for replacements, no one from Netherfield volunteered to join the Steering Group. Finally, Councillor Holmes resigned on the day the Neighbourhood Plan was presented to Battle Town Council for adoption, having been in possession of the confidential Regulation 14 briefing documents up to a week prior to the meeting.
	2	PP Sec 3 - Economy - Only Battle quoted. No statistical evidence to support any RA1 outcomes for Netherfield development, as there aren't any. No buses. No potential employers. No improved day-to-day services. All PP 3.10 SWOT Weaknesses apply in Netherfield	Asserts that RA1 outcomes are omitted & no buses or employment opportunities included in NP.	The determination of employment opportunities was made by RDC in their Local Plan Core Strategy (RA1), which was open to public consultation and where Netherfield residents could make representations. The RDC Local Plan Core Strategy did not include Netherfield in figure 10. Although the Neighbourhood Plan did not make specific representations for employment, it did recognise the need to protect business opportunities at White House Poultry Farm.

not used	Question number	Pro-forma text written and supplied to residents by Maurice Holmes, who is a Netherfield resident	Summary	Steering Group Response
				Transport is not in the remit of the Neighbourhood Plan, but it is included in our Community Aspirations.
	3	PP Sec 4 - PP not discussed with Netherfeild residents, not compliant with RDC Core Strategy RA1 as required under PP 4.1 Obj 1 and expounded in PP 1.3.6. Does not meet spatial considerations. See 6 below	Asserts NP not discussed with residents and non-compliant spatial considerations not met.	See above (section 1) for RA1 See below (section 6) for Spatial considerations
	4 *	PP Sec 4 - Non-Compliance with traffic mitigation measures (Objective 2). Conservative 150 additional cars (48x3) (see 3.5.2) will use roads. Roads leading to NE1, NE5a, NE5r and NE6, and exiting estate, do not meet modern safety standards on Darvel Down exit to B2096 and Netherfield Road. NE1 causing implementation yellow lines and 4 parking places to cover estimated removal of 60 cars from Darvel Down roads (Obj 9). Will lead to additional car trips . Loss of green gaps on NE1, NE5ar contrary to Sec 4. Obj 3 & sustainability	Asserts non-compliance with traffic mitigation requirements – basically does not want more traffic on Darvel Down.	Site NE01 (access via Darvel Down) gained outline (RR/2017/2308/P) and reserved matters (RR/2019/921/P) planning permission following ESCC Highways and RDC investigations into roadway use. The inclusion of Neighbourhood Plan policy IN1 is an example of the SG listening to Netherfield's expectations and reacting to help protect their viewpoint. The supporting document Local Green Spaces Analysis identified a significant number of Local Green Spaces in Netherfield.
	5	PP Sec 4 - Non-Compliance in meeting needs and wishes of residents (Objective 4) as never consulted. BNP Steering Group/AECOM failed to take account of 100 objections to Site	Asserts failure to take account of NE1 objections	This is not a Neighbourhood Plan issue. Whilst site NE01 contributes to the overall

not used	Question number	Pro-forma text written and supplied to residents by Maurice Holmes, who is a Netherfield resident	Summary	Steering Group Response
		NE1 when repeating same conditions in PP . Did not canvass opinion on proposed plan required under PP . Site NE1 included in BNP preferred Sites List version 1.7 Section 1.3. and Section 2 NE05a – “Note on capacity” documents (Pages 2&3). See 8 below		Netherfield dwelling total it is not a site allocated by the Neighbourhood Plan as it has received planning permission (RR/2019/921/P) from RDC despite opposition from Battle Town Council to the earlier outline planning application (RR/2017/2308/P – “ <i>The Council support a refusal of this application as: an inappropriate site due to access; loss of trees under TPOs; inadequate services e.g. drainage, utilities etc; and lack of infrastructure availability.</i> ”) It should be noted that neither Battle Town Council nor the Steering Group can seek to override planning permission already granted by RDC.
	6	PP Sec 4 - Non-Compliance with Netherfield -Protection for Open Spaces (Objective 5). PP is to develop on land designated as AONB at rate not consistent with Darvel Down Estate. (PP Proposed/Actual rate 25 per hectare- Darvel Down rate 16). Government Inspectorate already deemed 25 rate in PP (as used in their calculation shown in “Note on Capacity” Preferred Sites List Page 3 of 8) as excessive. No protection of Heritage Assets PP (Obj 6) as main house in Site NE5ar original Post Office for area (Netherfield Survey 1874/Kelly's	Asserts over-dense development (e.g. dwellings/hectare) and no protection for former PO building.	Statement 6 on the pro-forma refers to a larger development RR/2016/2722/P-Appealed RR/2017/1146/P-Appealed that had allocation of 48 dwellings on a different site to the ones put forward in the Neighbourhood Plan. Both appeals were dismissed on 3 rd

not used	Question number	Pro-forma text written and supplied to residents by Maurice Holmes, who is a Netherfield resident	Summary	Steering Group Response
		PO 1867). Health Centre (Obj 8) at Village Hall vetoed by RDC as no tarmac allowed on AONB		July 2018. The housing density at Darvel Down NE01 has been agreed by RDC planning as 25 dwellings per hectare. The steering group have calculated capacity of NENS05ar (Swallow barn) and NENS102 (White house poultry farm) based on the density of dwellings on NE01 (Darvel Down) on RR/2019/921/P. An independent Battle Heritage Charter Group have listed properties that meet their criteria and the old Post Office was not included. There was more than one location for the post office in Netherfield over last 100+ years.
	7**	PP Sec 5.1.1/2/8 – Outstanding dwelling numbers not consistent with RA1 (v) which allows variations by Neighbourhood Plans. An implication in PP of non-variance which is incorrect. Requires additional houses connections to already severely pressured utility and waste infrastructure systems, which regularly fail. Current Situation Apr 19 - Feb 18 - 8+ water outages, 6+ Elect failings (Dates can be supplied). No short/medium term plans to address problem - only repair work. Not sustainable with any additional dwellings. PP does	Asserts outstanding dwelling numbers not consistent with RA1(v). Also asserts that additional dwellings will overstretch utilities e.g. water and electricity. Also comments on not maintaining the “Green	With regards to the pro-forma reference to RA1(v), it should be noted that Netherfield is not listed in the RDC Local Plan Core Strategy. Overstretched utilities are not only a Netherfield issue. However, this is addressed in Section 7, Community

not used	Question number	Pro-forma text written and supplied to residents by Maurice Holmes, who is a Netherfield resident	Summary	Steering Group Response
		not maintain Green Belt gap between old village (bordering B2096) and new	Belt gap between old and new village.”	Aspirations is not a specific element of the Neighbourhood Plan – but the viewpoint has been strengthened as a result of Reg 14 consultation review. The Neighbourhood Plan does not differentiate “parts of Netherfield” – all is treated as one.
	8	PP Sec 5.2.1/2 - The BNPSG dismiss the 100 objections re Site NE1 (site included in PP re requirement numbers), resulting in yellow lines and parking restrictions on Darvel Down thereby not addressing this section of their PP . See 4 above	Asserts that the BNPSG dismisses the 100 objections Re site NE1. It is also asserted that “yellow lines” will fail to follow NP Reg 14 section 5.2.1/2	The inclusion of IN1 in the Neighbourhood Plan is an example of the steering group listening to Netherfield’s past experience and reacting to help protect their concerns. Site NE01 was given planning permission before the formulation of the Neighbourhood Plan. However the steering group have taken into consideration the concerns expressed by Netherfield residents about parking on Darvel Down. The two sites proposed in the Neighbourhood Plan (White House Poultry Farm NENS102 and Swallow Barn NENS05ar) have access on to the B2096 and <u>not</u> onto Darvel Down

not used	Question number	Pro-forma text written and supplied to residents by Maurice Holmes, who is a Netherfield resident	Summary	Steering Group Response
				and therefore will not impact on parking in this area. See comments above (sections 2, 3, 4 and 5) The traffic regulation orders and yellow lines are conditional requirements of the planning applications for NE01, which has already been granted by RDC.
	9***	PP Sec 5.3.1/2/3 Pol EN3 – PP will exacerbate wholesale removal of large area AONB land at NE5ar, NE6	Asserts “wholesale removal of AONB land” due to NE05ar and NE06 development.	The assertion is based upon a misunderstanding of process. The government dwellings requirement has been adopted by RDC. This then had to be used by the Neighbourhood Plan to permit development within the AONB, but with special protection, see NPPF Para172.
	10	PP will exacerbate the lack of local educational opportunities, as the 48+ additional homes cannot be accommodated in the already oversubscribed school from development initiation in 1st five years on estate.	Conjecture about school places required for 48+ additional houses.	Schools are outside of the NP remit. However, the ESCC Director of Childrens Services states that “Our latest forecasts indicate there should be sufficient early years, primary and secondary school places in both Battle and Netherfield over the Neighbourhood Plan Period to

not used	Question number	Pro-forma text written and supplied to residents by Maurice Holmes, who is a Netherfield resident	Summary	Steering Group Response
				meet the predicted demand for places”
		Signature: Return form to Netherfield Stores or deliver to Maurice at Whitehouse Farmhouse opp White Hart		
	4* 7** 9***	Additional Comments by one respondent: Strong objections to even more traffic on Netherfield Road/Hill as this has no pavements and already dangerous to pedestrians. Object to yellow lines on this small estate. Sufficient parking should be with any new housing approved. ESSENTIAL to maintain green belt AONB MUST be protected		

04 Conclusion

- 4.0.1 Throughout the process, the intention of the Steering Group has been to get as many members of our community as possible involved, using a variety of consultation techniques to ensure that we get a true picture of what the issues are for our community. The various consultation events have all been widely attended and public participation has been very positive.
- 4.0.2 The summary of the key stages of the BCPNP process so far include:
- Call for sites process
 - Neighbourhood Area Designation
 - Parish wide questionnaire/survey
 - Draft pre-submission plan
 - Reg.14 pre-submission
 - Building of the evidence base is continuous throughout the process
- 4.0.3 The public have been very supportive but critical throughout the production of the Plan through various consultation events and these have impacted directly on the production of the Plan.

05 Appendices

The appendices contain additional information that would be helpful to the flow of the main text of the statement. Due to the size of these documents these are a separate electronic Appendices labelled as **Battle CP NP Consultation Statement Appendix** on the website.

This can be found online at: <http://battleneighbourhoodplan.co.uk/>

CS Appendix i: Communication engagement strategy

CS Appendix ii: Questionnaires/surveys

CS Appendix iii: Photographs of consultation events

CS Appendix iv: Resources/literature from key consultation community events (links to section 2 consultation timeline)