SALEHURST & ROBERTSBRIDGE PARISH COUNCIL

Mrs Karen Ripley (Clerk)
The Parish Office
Youth Centre, George Hill
Robertsbridge
East Sussex. TN32 5AP

Tel: 01580 882066
E-mail: clerk@salehurst-pc.org.uk
www.salehurst-pc.org.uk

Service Manager, Strategy and Planning
Rother District Council
Town Hall
Bexhill-on-Sea
TN39 3JX

18th June 2018

Dear Sirs

RR/2017/1629/P – Land at Grove Farm, George Hill Robertsbridge Amended Plans June 18

Outline: Erection of 24 no. residential dwellings, car parking, landscaping and associated development with all matters reserved except for layout and access.

The Parish Council (PC) supports the principle of housing development on this site, in accordance with the Salehurst & Robertsbridge Neighbourhood Plan (SRNP), but has concerns about elements of the specific proposals, which are addressed below.

1. Salehurst & Robertsbridge Neighbourhood Plan – The Parish Council (PC) welcomes the fact that the Salehurst and Robertsbridge Neighbourhood Plan (SRNP) has been recognised in the Rother District Council (RDC) Officer Report as now being a material consideration.

However, it should be remembered that the whole Grove Farm site was allocated in Policy HO2 of the SRNP at the recommendation of the Independent Examiner, to facilitate the provision of more affordable housing than the Submission Draft SRNP allowed for. Therefore, it is most important that any application for the site provides the highest number of affordable homes, in accordance with RDC Core Strategy Policy LHN2. The Parish Council is mindful that previous applications for this site have raised issues of viability with regard to affordable housing provision. Only the full allocation (across the whole site) would now be acceptable.

The following comments are raised with regard to SRNP policies:

ED1: Under the Rother Local Plan of 2006, Policy VL7 indicated that developer funding should be directed towards Robertsbridge Community College to improve educational facilities in the village. The SRNP has ascertained educational needs in the village as of 2018 and it is Robertsbridge Children's Services (pre-school and nursery provision) which is in need of capacity enlargement, and so should benefit from any developer funding available.

EN3: In relation to this proposal, attention is drawn to:

a) paragraph 3: a planning condition should specify the use of local building materials,
b) paragraph 5 requires that damage to the historic field boundaries is kept to an absolute minimum, and that trees and hedgerows are preserved wherever possible.

EN4: Under this policy, any approval for the site will ensure that mature trees and species-rich hedgerows be retained as well as ecological networks. There is evidence of a bat route crossing the site and the PC is pleased to see that the draft planning conditions refer to this matter (conditions 26 and 27). The PC supports these planning conditions.

HO5: This policy requires that priority be given to 'local vernacular building materials' and this should be a planning condition.

IN1: Insufficient on-street parking is a very serious issue in Robertsbridge and the on-street parking on George Hill is used by residents (very infrequently), commuters and employees and visitors to both adjacent educational establishments (Salehurst CofE Primary School and Robertsbridge Children's Services). This means that for substantial parts of the day George Hill provides on-street car parking. Therefore, it is of considerable concern that the latest report submitted by the Applicant (Transport Update 30 May 2018) indicates in paras 3.4 and 3.5 a considerable net loss of car parking spaces on George Hill caused by the creation of two new entrances. We understand from speaking to the Applicant's agent that the quoted numbers may be incorrect, but the PC is concerned at any net loss of car parking spaces on-street, and this policy was designed to address this issue. Therefore, the PC would wish to see a similar number of car parking spaces provided elsewhere, to offset any net loss due to the creation of access(es) to the site.

IN3: In the context of this application, the PC requests consideration be given to funding the upgrading of the unsurfaced section of Footpath 43a. This is an important local pedestrian route, which will be used by future residents of the site to reach the railway station and other commercial, health or leisure facilities in the village.

IN6: In conversations with the PC the applicant offered to provide play equipment on land it owns as part of the application. Although ideas for this have been sketched on certain submitted plans, the PC would wish to this secured by a planning condition, including provision for future maintenance.

2. National Planning Policy Framework

Paragraph 100 flood risk: the PC wish to draw attention to failure in the reports submitted by the Applicant to deal adequately with the known surface water flood risk from the site, evidenced in the Applicant's own reports (Archaeological Evaluation and Soil Desk Survey at paragraph 11). This report has not been followed up with any supplemental information to

date and whilst the PC recognises and applauds the thoroughness of the proposed draft planning condition 22, particularly so far as future maintenance and management of any on-site drainage scheme is concerned, the PC has concerns that this matter has not so far been properly investigated to ensure there is no future off-site flooding. This is because there is consistent local experience of surface water flooding off-site, which has had serious effects on properties downhill from the site. This may be for a number of reasons including lack of maintenance of existing drainage on-site.

Paragraph 115: this requires 'great weight to be given to conserving landscapes in AONBs'. This site is wholly within the High Weald AONB and should therefore be accorded the same protection as other sites which have, within the past few months, gone to appeal and where the importance of such landscapes has been protected (decisions in Ticehurst – APP/U1430/W/15/3135953, Flimwell - APP/U1430/W/15/3140423, and Northiam – APP/U1430/W/17/3171529).
In particular, there is no suggested planning condition in the Officer Report regarding preservation of existing hedgerows and tree belts to preserve, insofar as possible, the features on the site which have been specifically recognised in the HWAONB Unit comments on this application.

3. RDC Core Strategy 2014

OSS4: whilst this is an outline application only, the PC considers that the current proposals, insofar as the positioning of units of accommodation in the draft plans is concerned, affect seriously the amenities of the following properties: Yew Lodge, Grove Farm Cottages, George Hill Cottages, by reason of the closeness of the proposals to these existing properties.

TR2(iv): this requires improvement to the pedestrian environment; as per SRNP Policy IN3 above, the PC considers that the Applicant should make provision for the off-site improvement of Footpath 43a which will be used by inhabitants of the dwellings to be constructed on this site to access local facilities.

4. Other Comments / Application Documents - the PC wishes make the following comments about the application, based mainly on the documents submitted in support of the application:

a) Transport Statement -

The following matters are of serious concern to the PC with regard to the accuracy of this latest reports, even though these have been revised:

i) **3.21:** Peak 'evening traffic flow' on George Hill is not 17.00 to 18.00 as reported, but 15.00 to 16.00, due to the proximity of the educational establishments. This should be obvious when for example the recorded evening flow by the consultant is only 75% of the morning peak flow for Monday. This is reinforced by local surveys of traffic flows between the hours of 15.00 and 16.00 which show that traffic is at least 15% greater in this time period than that suggested by the Applicant's latest report.

ii) **7.14:** "George Hill is at present considered to be a relatively lightly trafficked road". This is palpably untrue particularly at peak times - school dropping off and collecting times, which is about to be aggravated further by the already approved development (RR/2015/3106/P) on the western side of George Hill, known as the former Countrycrafts site, which is not referenced at all in any of the Applicant's reports.

iii) **7.18:** Remarks that the observed peak hour flow along George Hill "has not highlighted any existing junction capacity constraints … at the A21/George Hill junction". That cannot be extrapolated without actual observation at the A21 junction, of which there is no evidence provided.

b) Housing Statement: the PC is concerned that in the revised Housing Statement the Applicant is promising only to give a six-month opportunity to find an acceptable (to them) housing provider. Given the reason for the inclusion of this site in the site allocations by the SRNP, the Applicant should not place any conditions on how long it may take to form an agreement with an acceptable housing provider.

c) Design and Access Statement: no updated Design and Access Statement has been submitted so the following matters remain of concern to the PC who would wish them to be addressed fully:

i) **Paragraph 3.9.3:** fails to address the only significant flooding issue from the site, that of off-site surface water flooding. As stated in item 2 above (NPPF para 100) Without a proper assessment of this, which the PC does not believe is dealt with in the FRA as submitted, great care must be taken in drafting the appropriate pre-commencement conditions. It is not believed that the draft condition 22 fully addresses the PC's concerns in this regard. Other reports made available by the applicant, such as the Archaeological Survey of 2015 and the Soil Desk Study, do admit that water levels on the site are very high and surface water drainage is therefore a serious issue, and as a consequence flooding is often experienced by properties downhill from the site.

ii) **Paragraph 3.10.8/9/10:** in this analysis, the report fails completely to address the issue of pollution to land. However, the Soil Desk Study sets out in paragraph 9 a list of contaminants to land which, given the land's previous use, the PC considers to be of greater risk than moderate; paragraph 11 concludes that contamination has been identified and recommends ground investigation to be carried out. The PC is not aware that this has been carried out and a clear report should be issued before any decision is reached on this application. It is also noted that a letter from the Environment Agency (EA) to RDC dated 8th August 2017, posted 17/8/17 under current application RR/1642/P for the northern part of the site, reveals the EA's serious concerns, so far unaddressed by either this applicant or the previous applicant, with regard to land pollution. The PC notes that no planning condition has been drafted by RDC and therefore the PC suggests that a prior planning condition dealing with potential pollution and its resolution be inserted.

d) Flood Risk Assessment - the PC's further comments on this important report are as follows:

i) **Paragraph 4.3:** Last paragraph: The report proposes a new ditch on the southern boundary (i.e. at the highest part) and expresses the view that the "risk of flooding off-site is not increased due to alterations in the existing land drainage". But local experience shows such existing drainage cannot cope, given the frequency of off-site flooding down George Hill.

ii) **Paragraph 4.5**: This concludes that the risk of groundwater emergence is low, but this is not supported by the archaeologist's 2015 survey about flooding of trenches – see paragraphs 3.2, 4.0.1, 4.1.7, 4.18, 4.6.1, 4.9.6 and 6.7, nor by the Desk Soil Survey.

iii) **Paragraph 6.1:** The report works on the presumption that "for undeveloped greenfield sites, the impact of the proposed development will require mitigation to ensure that the run-off from the site replicates the natural drainage characteristics of the pre-development site". Given the actual experience of locals with regard to

off-site flooding in relation to the current greenfield, undeveloped site, that is simply not satisfactory and is serious cause for concern over the accuracy and validity of this report. This report has not been amended since its original submission and in the light of the PC's concerns regarding the potential of the site to shed substantial quantities of water in rainy conditions, the PC requests that RDC pay special attention to ensuring that draft planning condition 22 is carried out to the full.

iv) **Paragraphs 6.4/5/6:** The report only offers possible solutions to the serious drainage problems. Permission should not be granted until a firm solution has been agreed with Southern Water.

e) <u>Submitted Plans</u>

From a perusal of the submitted plans, the following issues arise which the PC requests that RDC take into consideration in this application, AND in any subsequent application for full permission:

i) There should be no tandem parking permitted – the current plans show at least one example of this.

ii) All enclosed parking provision should be by way of car ports, as opposed to garages, since car ports encourage their use by cars as intended, rather than storage facilities.

iii) The roadways should be entirely of a sufficient width to ensure the safe passage of goods vehicles, and safety of pedestrians, bearing in mind that if application RR/2017/642/P is approved as well as this one, all traffic to and from the northern, partly commercial site, will be via these roads.

<u>Summary:</u>

The PC believes that given the changes brought about by the existence of the SRNP, that this site is capable of being developed for housing but only if it fulfils not only those conditions which the law and RDC current planning policy require, but also those of the SRNP itself, which were amplified in the Independent Examiner's Report. Otherwise what purpose is served by the SRNP after all the hard work in getting it to an approved stage.

Separately the PC would request that on the site visit, the RDC Planning Committee not only look at the site itself but also look from the point of view of the immediately affected existing buildings off George Hill and from the aspect of the residents of Blenheim Court.

Finally, the PC wishes to raise concern at the short timescale given to consider and provide comments on the amended plans for this site, particularly as the amended application was received just a day after the SRNP referendum. With the requirement to call an extra meeting, this has put immense pressure on dedicated Councillors, to fully consider all the issues, and we would respectfully suggest that more time is needed for submitting comments in future.

Yours faithfully

Karen Ripley (Mrs)
Parish Clerk