

Rother District Local Plan 2025 - 2042

Interim Consultation Statement

www.rother.gov.uk

September 2026

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Table of contents

ABBREVIATIONS.....	4
1. INTRODUCTION.....	5
Purpose.....	5
Legislative and policy requirements.....	5
Statement of Community Involvement.....	7
Maintaining effective cooperation.....	7
2. REGULATION 18 CONSULTATION PROCESS	8
Early engagement and Regulation 18 consultation on the draft Rother Local Plan 2024.....	8
Call for Sites	9
Regulation 18 consultation on the draft Rother Local Plan 2026.....	10
3. CONSULTATION FEEDBACK	17
Who responded to the consultation	17
Reading this section.....	19
Main issues raised and how these have been considered.....	21
Objectives, Development Needs and Development Strategy.....	22
Site allocations.....	53
Bexhill	54
Southern Rother and Hastings Fringes	91
Battle and surrounding settlements.....	107
Rye and Eastern Settlements.....	121
Northern Rother.....	160
Other matters	190
APPENDIX A: CONSULTATION MATERIAL.....	195

Abbreviations

AONB	Area of Outstanding Natural Beauty (National Landscape)
BNG	Biodiversity Net Gain
CIL	Community Infrastructure Levy
HEDNA	Housing and Economic Development Needs Assessment
HELAA	Housing and Economic Land Availability Assessment
HRA	Habitats Regulations Assessment
HWNL	High Weald National Landscape
IDP	Infrastructure Delivery Plan
LDS	Local Development Scheme
NPPF	National Planning Policy Framework
S106	Section 106 (planning obligations)
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SEA	Strategic Environmental Assessment
SFRA	Strategic Flood Risk Assessment
SoCG	Statement of Common Ground

1. Introduction

Purpose

- 1.1. This Interim Consultation Statement has been prepared in support of the new Rother Local Plan. It sets out how Rother District Council (“the Council”) has undertaken public consultation and engagement to-date during the plan’s production. It also provides information on the main issues raised through this process, and how representations made to the consultation have been considered by the Council in preparing the Local Plan.
- 1.2. This document pertains to the consultation undertaken on the Rother Local Plan: Development Strategy and Site Allocations – Draft (Regulation 18) Version (January 2026), i.e., draft Local Plan 2026, and associated evidence base documents, which were subject to a Regulation 18 stage¹ public consultation, for a period of 8-weeks from 26 January to 23 March 2026.
- 1.3. A previous Interim Consultation Statement was published and this reported on the process and outcomes of the Regulation 18 consultation on the draft Local Plan 2024.
- 1.4. If approved by Council, a Regulation 19 consultation will be held on the Pre-Submission version of the Local Plan; and subsequently, a final Consultation Statement (i.e. Regulation 22 statement) will be prepared and submitted to the Secretary of State alongside the Local Plan and supporting documents for public examination, in line with the statutory requirements.

Legislative and policy requirements

- 1.5. The Government introduced a new-plan making system for England through the Levelling Up and Regeneration Act 2023. A package of statutory instruments has since been published, including the Town and Country Planning (Local Planning) (England) Regulations 2026, which came into force on 25 March 2026. These supersede the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.6. In August 2026, the Government published a new National Planning Policy Framework (NPPF), which replaces the December 2024 version, to bring it in line with the new planning system.
- 1.7. Through this transitional period to the new plan-making system, the Government has set a deadline for emerging local plans to be submitted to the Secretary of State for examination by 31 December 2026 in order to be assessed against the “legacy”

¹ As set out by The Town and Country Planning (Local Planning) (England) Regulations 2012, as amended.

planning system, i.e., The Town and Country Planning (Local Planning) (England) Regulations 2012 and the NPPF (2024).

- 1.8. Rother District Council is currently preparing a new Local Plan which, subject to its adoption, will form part of the statutory Development Plan for the district. The Council's Local Development Scheme (LDS) sets the timetable for the production of the new Local Plan. The LDS currently provides for the new Rother Local Plan to be submitted to the Secretary of State in December 2026, in line with the Government's deadline for plans to be examined under the "legacy" planning system.
- 1.9. The NPPF (2024) states that plans should be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees.²
- 1.10. This Interim Consultation Statement has been prepared having regard to Regulation 22(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), which requires the Council to publish a statement setting out:
 - a. Which bodies and persons the local planning authority invited to make representations under Regulation 18.
 - b. How those bodies and persons were invited to make representations under Regulation 18.
 - c. A summary of the main issues raised by the representations made pursuant to Regulation 18.
 - d. How any representations made pursuant to Regulation 18 have been taken into account.
 - e. If representations were made pursuant to Regulation 20, the number of representations made and a summary of the main issues raised in those representations.
- 1.11. To ensure compliance with the legislative and policy requirements the Council will prepare an additional Consultation Statement, following the Regulation 19 stage of public consultation. This will be submitted to the Secretary of State alongside the Rother Local Plan 2025-2042, along with additional supporting documents.

² NPPF (December 2024), paragraph 16.

Statement of Community Involvement

- 1.12. Under Section 19(3) of the Planning and Compulsory Purchase Act 2004, in preparing local development documents, local planning authorities must comply with the Statement of Community Involvement (SCI).
- 1.13. The SCI is prepared by the Council and sets out how and when it will engage with stakeholders and the wider community to ensure that everyone can participate in the planning process, including during the production of the Local Plan. The SCI sets out the different types of statutory consultation bodies. These are grouped as specific, general and other bodies.
- 1.14. The SCI is subject to periodic review and updating. At the time of the Regulation 18 consultation on the draft Local Plan 2026, the adopted SCI comprised the Rother SCI (January 2022) and SCI Addendum (January 2024)³.
- 1.15. The SCI is available to view online at the Council's planning webpages.

Maintaining effective cooperation

- 1.16. The Duty to Cooperate was established under Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended by Section 110 of the Localism Act 2011). It required local planning authorities, county councils and public bodies in England to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan preparation relating to strategic cross-boundary matters.
- 1.17. Importantly, the Duty to Cooperate was revoked by the Government with effect from 25 March 2026. Accordingly, emerging local plans – including the new Rother Local Plan - are no longer required to satisfy provisions on the Duty to Cooperate. This is also reflected in the NPPF 2026.
- 1.18. Emerging local plans assessed under the “legacy system” will still need to be prepared having regard to the NPPF (2024) policies and associated guidance on maintaining effective cooperation. NPPF (2024) paragraph 28 states, “In order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these”.
- 1.19. The Council has published an Engagement and Duty to Cooperate Statement – Draft (Regulation 18) Version (2024) and an Interim Duty to Cooperate Statement (2026). These are available to view online from the Council's Local Plan webpage and should

³ The SCI Addendum (January 2024) pertains to the public speaking scheme at Planning Committee.

be referred to for further information. They help to document the Council's process and record of cooperation with key stakeholders during the plan process. Further reports to document ongoing cooperation may also be prepared by the Council in due course.

- 1.20. The Council will seek to prepare Statements of Common Ground (SoCG) with relevant bodies and stakeholders, where appropriate, to help demonstrate how it has cooperated with them in preparing the plan. SoCG will be published where they have been agreed between the Council and relevant parties.

2. Regulation 18 consultation process

Early engagement and Regulation 18 consultation on the draft Rother Local Plan 2024

- 2.1. The Council undertook targeted early engagement with statutory bodies from 21 August to 16 October 2020. Following which, the Council carried out further early-stage engagement with a wider range of key stakeholders to inform the preparation of the Local Plan. The main intention of these exercises was to set out the approach to preparing the new plan. This included the identification of key strategic issues to be assessed, how key stakeholders and neighbouring authorities might be involved at an early stage, and to assist with meeting the requirements of the Duty to Cooperate. Full details of this early-stage engagement are set out in the New Local Plan – Early Engagement Document (April 2021), which should be referred to for further information.
- 2.2. The Council's first Regulation 18 consultation on the draft Rother Local Plan 2020-2040 (2024), i.e., draft Local Plan 2024, and associated supporting documents was held during a 12-week period from 30 April to 23 July 2024.
- 2.3. The draft Local Plan 2024 set out a future vision, key objectives, and overarching principles to help guide future growth and development in Rother district. It also set out a range of proposals including for a new spatial strategy and associated strategic policies to help give effect to it, together with development management policies across a range of thematic topic areas. Notably, the draft Local Plan 2024 did not include proposed site allocation policies.
- 2.4. In addition, in 2024, the Council invited the public to submit comments on selected 'Supporting Evidence Base Documents' for the Local Plan, as follows:
 - Sustainability Appraisal Interim Report (April 2024)

- Habitats Regulations Assessment (March 2024)
 - Draft Housing and Economic Land Availability Assessment (HELAA) (April 2024)
- 2.5. There were 617 respondents to the first Regulation 18 consultation whose representations amounted to more than 3,700 unique comments on the draft Local Plan 2024 and Supporting Evidence Base documents.
- 2.6. Further details on the public consultation process and outcomes are available in the Interim Consultation Statement (January 2026). This report includes a summary of the main issues raised during the consultation and how these comments have been considered during the preparation of the Local Plan.

Call for Sites

- 2.7. As part of the early-stage engagement on the new Local Plan, the Council carried out a 'Call for Sites' exercise. The Call for Sites is used to inform the Housing and Economic Land Availability Assessment (HELAA) and assists the Council in identifying land that may be suitable for development, and therefore merits consideration for the Local Plan.
- 2.8. The Call for Sites was launched on 12 October 2020, and the exercise initially ran to 7 December 2020; following which it has remained open. It was re-advertised to the public in June 2025. As well as being publicised locally and on the Council's website, the following groups received direct notification of the Call for Sites:
- Landowners and land promoters
 - Developers and planning agents
 - Local property agents (residential and commercial)
 - Town and parish councils
 - Local Enterprise Partnership
 - Businesses and relevant local interest groups
 - Statutory bodies and local authorities

- 2.9. These groups were invited to submit sites for consideration by the Council. Respondents were asked to: complete a standard site submission form; supply a site location plan; and include any relevant supporting evidence, if available.
- 2.10. As part of the Call for Sites exercise, the Council invited submissions separately for Gypsy, Traveller and Travelling Showpeople Sites (to address accommodation requirements for this group) as well as for Nature Sites (to contribute towards Biodiversity Net Gain). The Council has set up dedicated Call for Sites webpages and submission forms for these.
- 2.11. All submissions to the Call for Sites exercise have been considered during the preparation of the Local Plan, as long as it has remained open.

Regulation 18 consultation on the draft Rother Local Plan 2026

- 2.12. The following section of this report provides details on the process for carrying out the Regulation 18 consultation on the draft Local Plan 2026, the main issues raised by respondents during the consultation, and details of how these have been considered by the Council in preparing the Local Plan, and particularly the Regulation 19 Pre-submission version of the plan.

When we consulted

- 2.13. The Regulation 18 consultation on the draft Rother Local Plan 2026 and associated supporting documents was held during an 8-week period from 5:00 pm on Monday, 26 January to 11:59 pm on Monday, 23 March 2026.

What we consulted on

- 2.14. The Council invited the public to submit representations on the Rother Local Plan: Development Strategy and Site Allocations – Draft (Regulation 18) Version (January 2026).
- 2.15. The new Local Plan, once adopted, will form part of the statutory development plan for Rother district, and will update and replace the adopted Core Strategy (2014) and Development and Site Allocations Local Plan (2019).
- 2.16. The draft Local Plan sets out the long-term planning and development framework for Rother, which is focussed on delivering sustainable development. The Regulation 18 consultation in 2026 focussed on the development strategy for Rother district (which was updated following the first

Regulation 18 consultation in 2024), proposed site allocation policies, as well as area-based policies (covering the five geographic sub-areas set out in the plan).

2.17. In addition, the Council published a Sustainability Appraisal Interim Report (January 2026) and invited the relevant statutory environmental consultation bodies (i.e., Environment Agency, Historic England and Natural England) to submit representations on it. The wider public was also invited to submit representations on this document via Question 68 of the consultation Response Form (discussed later in this report), which asked, *“Do you have any comments on the Interim Sustainability Appraisal in support of the Regulation 18 stage consultation on the Development Strategy and Site Allocations (January 2026)?”*.

2.18. As part of the considerations for the Development Strategy, the draft Local Plan 2026 set out proposed approaches for development densities. A Density Study Update (January 2026) informed the approaches in this respect, and the wider public was invited to submit representations on this evidence base document via Question 7 of the consultation Response Form, which asked, *“Do you have any comments on the preferred approach for housing density shown in Figure 9, or on the updated Density Study (2026)?”*.

2.19. The Council also invited selected statutory consultees and other key stakeholders to submit representations on the Draft Infrastructure Delivery Plan (January 2026).

Evidence base documents

2.20. Following the first Regulation 18 consultation in 2024, the Council prepared new and updated evidence base documents. The documents were made available on the Council’s Local Plan evidence base webpage to view alongside the Draft Local Plan (2026). As noted above, the public was invited to submit representations on selected evidence base documents as part of the 2026 Regulation 18 consultation.

How we consulted

Notification and publicity

2.21. A variety of methods were used to notify the public about the 2026 Regulation 18 consultation, as set out below.

Consultation Database

2.22. The Council's planning service maintains a Consultation Database⁴ that contains the names and contact details of individuals and organisation who have informed the Council they wish to be made aware of planning consultations. The database includes contacts of statutory consultation bodies, discussed later in this report. Written notifications with information about the Regulation 18 consultation were sent to all contacts on the database, as of that time, and those who had previously made representations to the Local Plan consultation. Email notifications were sent where email addresses had been provided by contacts, otherwise letters were sent by post. Statutory consultees (Specific and General) were also notified.

My Alerts and Mailing Lists

2.23. Notifications were sent out through the Council's 'My Alerts', a weekly email service that provides information for residents and businesses in Rother registered to the service. Targeted emails were also sent to those on the 'Community Alerts' and 'Major Consultations' mailing lists. Further details of these notifications are set out in the table below.

Figure A. Details of notifications sent via My Alerts and Mailing Lists

Date sent	Type	Details	Successfully delivered alerts
30 January 2026	My Alerts	Standalone story	40,992
6 February 2026	My Alerts	From the Leader	41,017
20 February 2026	My Alerts	Standalone story	41,046
23 February 2026	Community Alert	Notification	32,726
3 March 2026	Major Consultations	Notification	32,393
6 March 2026	My Alerts	From the Leader	41,114
10 March 2026	Major Consultations	Notification	32,355
13 March 2026	My Alerts	Standalone story	41,157

Council Website, News Media and Social Media

2.24. A news article was published on the Council website on 27 January 2026. This can be viewed at the following link:

⁴ Information on the Consultation Database is held in accordance with the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

<https://www.rother.gov.uk/news/have-your-say-on-rothers-future-local-plan-consultation-opens-this-month/>

2.25. A news article was published on the Council website on 6 February 2026,

[From the Leader – Friday, February 6 – Rother District Council](#)

2.26. The 6 February news article (above) was also sent out to the Bexhill News, Bexhill Observer, and to the Rye & Battle Observer in Doug Oliver's regular Leader column in those newspapers on or around 6th February.

2.27. A Press Release was published on 27 January 2026, including details of the Local Plan consultation and statements from Councillor Teresa Killeen, portfolio holder for planning.

2.28. Social media posts were made on the Council's Facebook, Twitter (now X) and LinkedIn pages to notify users of the start of the consultation period, as well as a subsequent post near the end of the consultation period, as a final reminder of the consultation closing.

2.29. In terms of social media, the Council promoted the consultation five times across its main social media channels between the end of January and early March. Each time, each post was published on Facebook, LinkedIn, X, and Instagram. Facebook is still the most used social media platform by Rother residents.

2.30. For public exhibitions (discussed below), information was posted on the Council's website and notifications sent by Alerts and Mailing Lists (as noted above). Furthermore, posters for each exhibition were sent out to the relevant parish councils for them to advertise this locally.

Making documents available for inspection

2.31. The draft Local Plan 2026 together with information about the Local Plan and the Regulation 18 consultation, were made available online at the Council's Local Plan consultation webpage.⁵ From this, links were provided for access to the full suite of evidence base documents, including the Sustainability Appraisal Interim Report (2026), Habitats Regulations Assessment Background

⁵ <http://www.rother.gov.uk/draftlocalplan>

Paper (2026), Density Study Update (2026) and Draft Infrastructure Delivery Plan (2026).

2.32. A dedicated online consultation webpage was also created for the draft Local Plan 2026. This could be accessed from the Council's website and the main Local Plan consultation webpage. The dedicated webpage provided opportunities for the public to view the consultation documents and respond directly to these online.

2.33. Hard copies of the draft Local Plan 2026 and the Consultation Response Form, were also made available for inspection at the Council's principal office, selected libraries and community libraries, as set out below:

- Council office: Bexhill Town Hall
- Libraries: Battle, Bexhill, Rye, Wadhurst
- Community libraries: Northiam

2.34. At Bexhill Town Hall, a public access computer was made available for those wishing to view the draft Local Plan 2026, Consultation Response Form and supporting Evidence Base documents online.

2.35. In accordance with the Statement of Community Involvement, hard copies of documents could be purchased at cost price, and upon request, made available in large print, Braille, on audio tape or CD, and translated into other languages.

Public exhibitions

2.36. A series of public exhibitions, 6 in total, were held around the district to raise awareness of the draft Local Plan and consultation opportunities. The exhibitions were attended by Council planning officers who were available to answer questions and provide further information. Details of the exhibition programme are set out in the table below.

Figure B. Details of public exhibitions

Area	Venue	Date	Time
Ticehurst	Ticehurst Village Hall, Lower High Street, TN5 7BB	26 Feb 2026	3pm – 7pm
Westfield	Westfield Community Hall, 21 Workhouse Lane, TN35 4QL	28 Feb 2026	1:30pm – 5:30pm

Bexhill	The Pelham Community Hub, Holliers Hill, Bexhill-on-Sea TN40 2DD	2 Mar 2026	3pm – 7pm
Rye	Tilling Green Community Centre, Mason Road, TN31 7BE	6 Mar 2026	3pm – 7pm
Battle	Battle Memorial Hall, 81 High Street, TN33 0AQ	10 Mar 2026	3pm – 7pm
Bexhill	St Marks Church Hall (Little Common), Green Lane, Bexhill- on-Sea TN39 4BZ	12 Mar 2026	3pm – 7pm

Making representations

2.37. The Council invited the public to make representations to the draft Local Plan 2026, Regulation 18 consultation through various means, as follows:

- By using the Council’s dedicated consultation webpage online;
- By using the Consultation Response Form and submitting this by email or post;
- By email; and
- By post.

Who we consulted

2.38. Planning legislation requires the Council to consult with prescribed consultation bodies during the production of the Local Plan. These bodies are broadly categorised as general consultation bodies and specific consultation bodies. Furthermore, legislation requires the Council to consult residents or those carrying out business in the district, as it considers appropriate.

2.39. Further details on the general and specific consultation bodies relevant to Rother District Council are set out in the adopted Statement of Community Involvement, Appendix 1, which should be referred to for further information. The bodies are also set out on the next page, in some cases with examples of organisations.

2.40. The Council consulted with the above noted prescribed bodies, where appropriate, during the 2026 Regulation 18 consultation. The next section of this report (Section 3) provides information on who responded, and details of representations received from them.

General consultation bodies

- Voluntary bodies some or all of whose activities benefit any part of the district
- Bodies that represent the interests of different racial, ethnic or national groups in the district
- Bodies that represent the interests of different religious groups in the district
- Bodies that represent the interests of disabled persons in the district
- Bodies that represent the interests of persons carrying on business in the district

Specific consultation bodies

- The Coal Authority
- The Environment Agency
- Historic England
- The Marine Management Organisation
- Natural England
- Network Rail
- Highways England
- East Sussex County Council, Parish Councils, and neighbouring Local Planning Authorities, as well as Police and Crime Commissioner
- Relevant telecommunications companies
- Relevant electric and gas companies
- Clinical Commissioning Groups
- Relevant sewerage undertakers (e.g. Southern Water)
- Relevant water undertakers (e.g. Southeast Water)
- Homes England and Regulator of Social Housing (previously Homes and Communities Agency)

3. Consultation Feedback

- 3.1. This section of this report provides a summary of the feedback received to the Regulation 18 consultation on the Draft Rother Local Plan (2024). It highlights the main issues raised by respondents. It also sets out how this consultation feedback has been considered by the Council during the preparation of the plan.
- 3.2. It should be noted that the following section does not generally indicate where respondents have provided their support for the draft Local Plan proposals. Rather, the intention here is to signpost and distil the main issues raised by respondents during the Regulation 18 consultation.
- 3.3. All responses to the Regulation 18 consultation on the draft Local Plan 2026 are available to view at the [Online Consultation](#) webpage, which can be accessed using the link provided or from the Council's [Local Plan webpage](#).

Who responded to the consultation

- 3.4. A wide range of individuals and groups responded to the 2026 Regulation 18 consultation. This included government bodies, local authorities, parish councils, infrastructure and service providers, community and special interest groups, landowners, developers and planning agents, businesses, and residents. Further details on specific and general consultation bodies submitting representations are set out in the figure below.

Figure C: Consultation Respondents by Main Category

Specific consultation bodies
Key statutory bodies Active Travel England, Environment Agency, Historic England, Homes England, National Grid Electricity Transmission, National Highways, Natural England, Network Rail, NHS Property Services, NHS Sussex, Pevensey & Cuckmere WLMB, South East Water Ltd, Southern Water, Sport England
Local and other authorities Ashford Borough Council, East Sussex County Council, Eastbourne Borough Council, Folkestone & Hythe District Council, Hastings Borough Council, Kent County Council, Tunbridge Wells Borough Council, Wealden District Council
Parish councils Battle Town Council, Beckley Parish Council, Brede Parish Council, Brightling Parish Council, Burwash Parish Council, Camber Parish Council, Catsfield Parish Council, Etchingham Parish Council, Ewhurst Parish Council, Fairlight Parish Council, Hurst Green Parish Council, Icklesham Parish Council, Iden Parish Council, Peasmarsh Parish Council, Playden Parish Council, Rye Town Council, Salehurst & Robertsbridge Parish Council, Sedlescombe Parish Council, Ticehurst Parish Council, Udimore Parish Council, Wadhurst Parish Council, Westfield Parish Council
General consultation bodies (organisations and groups)
9th Bexhill Scout Group, Anchor Hanover, Asten Fields Residents Association, Battle for Trees, Bewl Sailing Association, Bexhill Heritage, Bexhill Museum, British Horse Society, Broad Oak Park Friends, Burwash Common and Weald Residents Association, Burwash: Save our Fields, Community Supporters, CPRE Sussex, EBROFROST UK LTD, Elmsmead Protection Group, Friends of Bewl Water, High Weald AONB Unit, Home Builders Federation, Kieran Mullan MP, Martins Oak Surgery, NatureSpace Partnership, Rye Neighbourhood Plan Steering Group, Sidley Crickey Club, Southern Housing, Sussex Butterfly Conservation, Sussex Community Housing Hub, Sussex Greenways, Sussex Ornithological Society, Sussex Ramblers, Sussex Wildlife Trust, The National Trust, Wild About Burwash

Reading this section

- 3.5. The following section of the Interim Consultation Statement provides a summary of feedback received to the Regulation 18 consultation on the Draft Rother Local Plan (2026). For ease of reference, the summary is organised by the main chapters and subsections set out in the Draft Rother Local Plan (2026), as well as the order of questions set out in the Consultation Response Form.
- 3.6. This section does not specify which individuals, groups or organisations made specific comments, except in the case of ‘specific consultation bodies’ and other selected stakeholders. The Council considers this to be a useful way of signposting where Government bodies, parish councils, infrastructure providers and other such stakeholders have made representations.
- 3.7. However, as noted above, all responses to the Regulation 18 consultation (2026) are available to view at the [Online Consultation webpage](#), which can be accessed using the link provided or from the Council’s new [Local Plan webpage](#). This provides details of those who submitted representations.

Main issues

- 3.8. For each question on the Consultation Response Form, the section provides a short form summary of the main issues and other notable comments arising from the representations, set out in a table format. ***It is important to note that the summaries do not necessarily capture all of the issues and comments made. Rather, the intention here is to draw out the ‘main issues’, in line with the statutory requirements,*** as identified by Council officers through a comprehensive review of the representations.
- 3.9. The summaries do not generally indicate where there was support for the policies or plan proposals, however it should be noted that there were instances where such support was provided by respondents.

How representations have been considered

- 3.10. The section also provides a summary of how representations to the consultation on the draft Rother Local Plan 2026 have been taken into account by the Council in preparing the Local Plan, particularly the main issues raised.
- 3.11. Again, this is a summary and does not necessarily capture all of the actions or work that the Council has undertaken (such as additional cooperation and

engagement with key stakeholders, and ongoing work on the Sustainability Appraisal and Habitats Regulations Assessment).

Useful to know

- 3.12. The second Regulation 18 stage public consultation on the draft Local Plan (2026) focussed on the proposals for the Development Strategy, site allocations and area-based policies. It did not cover or revisit the full complement of policies and topic areas presented in the first Regulation 18 stage consultation on the draft Local Plan 2024.
- 3.13. In line with the statutory requirements, at the ‘submission’ stage of the plan process⁶ the Council will prepare and submit to the Secretary of State a final Consultation Statement. This will bring all feedback received on the Regulation 18 documents together, including a discussion on the main issues and how these have been considered.

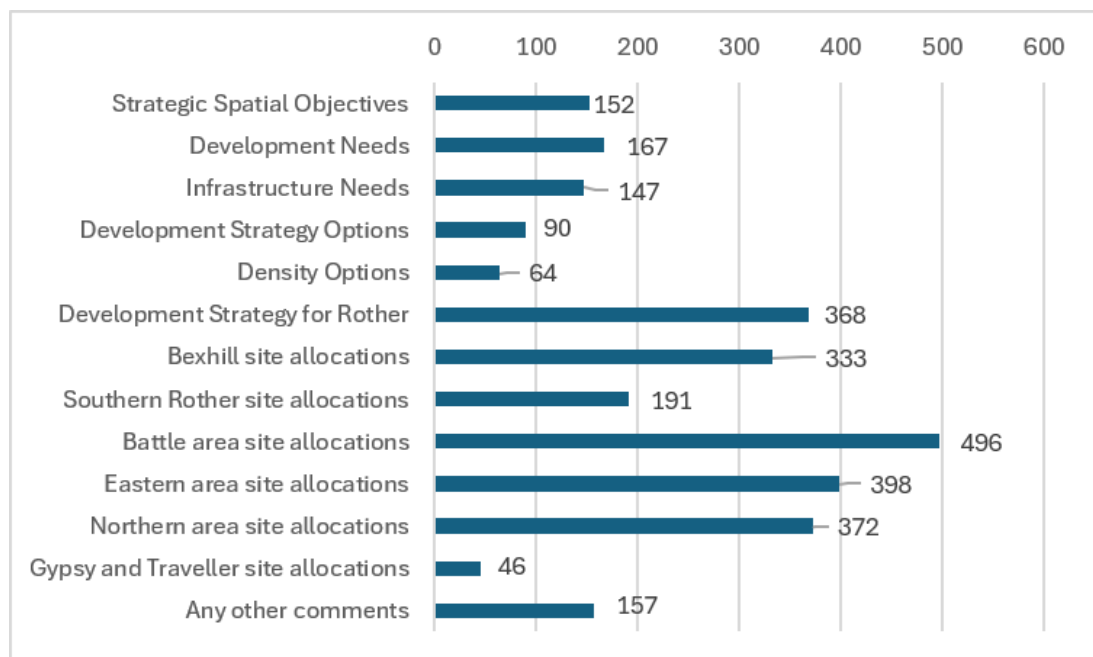
⁶ Regulation 22, as per the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended.

Main issues raised and how these have been considered

3.14. The following section sets out the main issues raised during the Regulation 18 consultation on the draft Rother Local Plan 2026 and how these have been considered by the Council in preparing the plan. These are set out in order of the questions in the Consultation Response Form, which was issued as part of the consultation and also reflected in the sequence of questions set out on the online consultation platform.

3.15. An overview of the number of comments received on the different parts of the draft Local Plan 2026 is set out below. This is provided for information and to help illustrate the general level of interest on the policy areas in the plan. It is not a reflection of the importance or weight given to the representations.

Figure D. Number of comments received on the draft Local Plan 2026, by topic area



Objectives, Development Needs and Development Strategy

Question 1
Do you have any comments on the amended Rother Local Plan Strategic Spatial Objectives shown in Figure 1?
Main issues raised
There is no objective relating to the protection of water quality or relating to the Environmental Management section (that includes the water quality policy in general) (Environment Agency)
There should be stronger emphasis on primary healthcare infrastructure (NHS Sussex and others)
East Sussex Local Nature Recovery Strategy should be referred in the strategic objectives (Natural England and others)
Objective 8 should reference to electric vehicle charging infrastructure. (ESCC)
Objectives should set out to meet housing need in full (planning agents)
Object to objective on net zero operational carbon as inconsistent with national policy (planning agent) and that focus should be on contributing to achieving net zero nationally as Rother cannot achieve this on its own (Home Builders Federation).
Objectives do not mention the High Weald Area of Outstanding Natural Beauty
Specific types of infrastructure should be referred to in the objectives (for example, sewerage and health care),
Delivery of supporting infrastructure should be an objective in its own right. Concerns that objectives cannot be realised without supporting infrastructure, particularly in rural areas, together with appropriate funding.
Suggestions for additional references to 'affordable housing' and 'town centres'
There is a disconnect or incompatibility between the strategic objectives and policies in the plan and NPPF. The objectives are undermined by draft site allocations and proposals for development on greenfield land. Other examples include significant new development in the AONB which will be harmful to it, and growth that is likely to increase flood risk and carbon emissions.
There are no definitions for planning terms used in the objectives, or they would benefit from further clarification
Greater emphasis on transport and connectivity in rural areas needed

How the main issues have been considered

- Objective to improve water quality included
- Objective for environmental protection included
- Objectives on housing re-ordered to second objective in table for legibility (although order of objectives not an indication of their importance)
- Local Plan glossary reviewed and updated
- It was considered that many other suggestions for specific objectives were broadly captured by the proposed strategic objectives

Question 2

Do you have any comments on the Council's proposed housing target for the Local Plan of 8,427 dwellings over the 17-year plan period, or 495 dwellings annually?

Main issues raised

Objection to housing target unless commitments are made for provision of primary health care infrastructure (NHS Sussex)

A more detailed explanation is needed to demonstrate that RDC have explored all options to seek to rectify the shortfall and meet housing need in full. Shortfall has potential impacts on neighbouring authorities (Ashford Borough Council. Tunbridge Wells Borough Council).

Comments as to whether opportunities for identify land for homes has been fully considered through the options appraisal, i.e., strategic gaps option should be considered through the SA in greater detail to explore potential for additional housing land supply; potential to explore densities in Bexhill. Further evidence required on deliverability of growth options in terms of transport impacts / capacity on the highway network (Wealden District Council).

Objections to the proposed target of 8,427 dwellings, which provides for 54% of local housing need / Government housing target. Suggestions that this renders the Plan unsound and not positively prepared. Wider context of neighbouring authorities also unable to meet local housing needs in full, contributing to situation of growing unmet housing needs in Sussex. (planning agents)

The Council has failed to demonstrate that it has robustly considered all suitable and available sites for housing within the district (planning agents)

A more ambitious housing strategy is required, treating the High Weald NL as a factor for site-specific design rather than a blanket restriction (planning agent)

Objections to proposed housing target on the basis of constraints in the district, particularly the High Weald National Landscape, habitats sites, ancient woodland, and areas of flood risk / those where sewerage issues exist, arable farmland.

Objections to proposed housing target on the basis of lack of infrastructure to support the levels of growth set out, and insufficient provision of infrastructure currently

Objection to proposed housing target as it is being imposed by Central Government / the Government standard method produces an artificially high number for Rother, does not genuinely reflect local needs and does not match past delivery rates. Some suggest the Council should object to the Government's local housing need target.

More should be made of existing properties. This includes re-use of vacant properties (bringing empty homes back into use) and better enabling older people to move from larger homes into smaller properties. This may contribute to housing supply and meeting local needs, and avoid the need for allocating new development sites. The housing target does not account for holiday homes or second homes.

Objections to amount of housing development proposed in parishes or other local areas

Impacts on the National Landscape not fully assessed

How the main issues have been considered

- Housing and Economic Land Availability Assessment reviewed and updated to provide up-to-date evidence of land that is suitable, available and achievable for housing development
- Development data reviewed to provide up-to-date evidence of planning permissions and completions data
- Windfall development data reviewed to inform position on windfall allowance to be applied in the housing trajectory
- Landscape Sensitivity study prepared to inform site allocations and indicative development capacities for sites, including sites within the HWNL
- Infrastructure Delivery Plan reviewed and updated
- Local Plan housing target updated based on updated evidence
- Housing trajectory prepared

Question 3

Do you have any comments on the identified employment needs, or needs for retail and main town centre uses?

Main issues raised

No recognition of parking to meet demands arising from additional commercial development in town centres.

Retail and commercial behaviour is changing particularly online shopping. Most purchases and retail are completed online. There should be recognition of this and not an imperative to grow town centres – if housing is required, then town centres should be converted or re-purposed to meet this need, for example, vacant buildings.

The Draft Local Plan assumes that sufficient employment opportunities exist to support the scale of housing proposed. However, this assumption does not appear to reflect the reality of the district's employment geography. A significant proportion of the proposed housing allocations are located on remote greenfield sites. These locations do not have the economic base to support a large increase in residents seeking work locally. As a result, many new residents would likely need to commute outside the district for employment, increasing traffic congestion, pressure on transport infrastructure, and carbon emissions.

Existing and future proposed areas for residential growth and development are not with an easy commuting distance of employment locations.

How the main issues have been considered

- Housing and Economic Land Availability Assessment reviewed and updated to provide up-to-date evidence of land that is suitable, available and achievable for economic development
- Updates to the Housing and Economic Development Needs Assessment and Rother Retail & Town Centre Uses Study prepared, with latest identified

needs reflected in the Local Plan (see Chapter 2 and thematic policy Chapters for ‘Delivering New Homes’ and a ‘Thriving Local Economy’)

- Planning policies to meet economic development needs reviewed and updated, including thematic topic area policies and site allocations

Question 4

Do you have any comments on the identified accommodation needs of gypsies, travellers and travelling showpeople?

Main issues raised

Primary care providers support the identification of accommodation needs for gypsies, travellers, and travelling showpeople. However, the Local Plan does not adequately address the impact of new pitches on primary healthcare services. New permanent or transit pitches will increase demand for GP services, and many traveller communities already experience significant health inequalities and require enhanced access to primary care. Without appropriate planning, this could place additional strain on already constrained GP practices. The Local Plan should explicitly recognise the need to assess and mitigate healthcare impacts arising from new traveller site allocations. Where new pitches are proposed, appropriate healthcare provision must be considered, including accessibility to GP services and, where necessary, developer contributions toward expanding local primary care capacity. This is essential to ensure equitable access to healthcare and to support sustainable, inclusive communities (NHS Sussex).

The council welcomes continued opportunities to work with RDC on a cross-boundary basis to address any unmet gypsy and traveller needs (Hastings Borough Council)

RDC uses the PPTS compliant definition (as defined in December 2023). TWBC uses the broader, ethnic definition. TWBC is seeking to meet the ‘ethnic’ need to ensure that the needs of all households who ethnically identify as Gypsies and Travellers are accounted for, regardless of whether they have ceased to travel. TWBC would recommend that RDC also takes this approach in applying the ‘ethnic’ definition (Tunbridge Wells Borough Council).

It is difficult to comment until the revised East Sussex Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment is published.

Allocating additional sites without understanding why existing allocations have not been delivered risks undermining confidence in the plan-led system. A criteria-based policy, allowing sites to come forward where need is demonstrated, may represent a more flexible and effective strategy.

Whilst there is a small need, the locations of these sites should be nearer main link roads.

The policy should include a requirement that the sites should not be on protected landscapes.

We believe that it is important that traveller provision is provided upon suitable sites with allocations focused upon suitable sites with willing landowners. We confirm that due to ongoing issues with unauthorised encampments across our landholdings we are not willing to make land within our ownership available for this use (Sea Change Sussex).

How the main issues have been considered

- Ongoing joint working with East Sussex local authorities to prepare a Gypsy and Traveller Accommodation Needs Assessment update
- Reviewed and revised the strategic approach to accommodation needs for gypsy, traveller and travelling showpeople to recognise that windfall developments may be required to help to meet identified needs (that may arise through updated studies of need over the plan period)
- Continued to include site allocation policies to meet identified needs of this group
- Site allocations can only be made on land that is available for this use

Question 5. Do you have any comments on infrastructure needs or priorities to support the proposed Development Strategy?

Main issues raised

The IDP will require further revisions once the updated strategic transport modelling is complete. See full text for detailed comments. (National Highways)

Transport & highways: Move away from "Predict and Provide" toward a "Vision and Validate" approach aligned with Local Transport Plan 4 (LTP4). Promote an infrastructure first model where transport, rail, freight, and active travel links are delivered before home occupations. (ESCC)

Education: Prioritise S106 and CIL funding to cover the costs of new school places. ESCC will review, update and provide the information regarding education provision as new data becomes available.

Primary & early years provision: a number of rural primary schools in the district are operating under-capacity. ESCCC supports the creation of new primary schools and nurseries to mitigate housing growth pressures in West Bexhill (BX18/BX27), North Bexhill (BX29/BX37/BX39), and Worsham Farm (BX45).

Secondary provision: Year 7 secondary school intakes across the county peaked in 2022/23 and are currently in decline; but given housing growth and birth rate, additional secondary school capacity might be needed later in the local plan period. Special Education Needs (SEND): The quantum of new homes planned across the district during the plan period is likely to have a significant impact on the growing demand for SEND provision.

(ESCC)

Ecology: Landscape-scale deer management is a key priority in East Sussex to protect woodland regeneration and safeguard the quality of local habitats. However, successful implementation is dependent on sufficient infrastructure to develop a local venison market (abattoirs etc). Suitable infrastructure would help to deliver the LNRS, would support the objectives of the High Weald National Landscape and would support local economies. (ESCC)

Highlights significant traffic increases at key junctions that cross into or impact Kent, specifically the A21/A268 Flimwell crossroads, A229 Cooper's Corner, and the already constrained Hawkhurst crossroads. (KCC)
Expresses concern over additional pressure on the A228 and other Kent roads identified as vital strategic routes. (KCC)
Demands a full assessment of proposed growth to ensure that development in Rother does not result in "severe" congestion or compromise highway safety on the Kent network. (KCC)
Recommends using the Kent Transport Model to accurately predict and mitigate the impacts of the Local Plan on neighboring infrastructure. (KCC)
Welcomes ongoing, three-way engagement between Rother District Council, East Sussex County Council, and Kent County Council to manage shared transport challenges. (KCC)
Supports the Council's approach to timely delivery of infrastructure and promoting the railway. (Network Rail)
IDP should include a new entrance for Bexhill railway station to improve passenger flow and accommodate future growth. (Network Rail)
Regarding Battle Station, while design funding for step-free "Access for All" at Battle station is secured, full delivery funding is still required. NR will provide further updates. (Network Rail)
NHSPS recommends that the Council engage with the relevant Integrated Care Board (ICB) to add further detail within the Local Plan and supporting evidence base (Infrastructure Delivery Plan) regarding the process for determining the appropriate form of contribution towards the provision of healthcare infrastructure where this is justified. (NHS Property Services)
Requests that healthcare providers retain full flexibility to determine how development impacts are met, whether through financial contributions or the direct delivery of facilities. (NHS Property Services)
Supports proposed A21 road safety schemes, but highlights a critical omission regarding plans to mitigate congestion at the Flimwell junction. (NHS Property Services)
Rail Infrastructure: Requests additional details on infrastructure plans to support housing growth at Etchingham, Robertsbridge, and Stonegate railway stations. (NHS Property Services)
Treat primary care as 'critical priority' to ensure GP services keep pace with local growth. (NHS Sussex)
Policies must ensure developers contribute financially to building or improving local infrastructure/ services. IDP should help enable sustainable housing by using developer contributions to fix capacity issues rather than creating new barriers to growth. (multiple, inc. NHS Sussex)
Welcome the recognition of green infrastructure as a type of infrastructure (2.23), the commitment to "Integrate community centres into wider green infrastructure..." (4.22 c) and the aim set out in the Council's strategic objectives and in the Rother Climate Strategy 2030. (Natural England)
Noted and supported the intention to review and update the Draft Dungeness Complex SARMS; however, the use of a mechanism for collecting funds from affected developers would of concern with regard to HRA compliance. As such, NE

advised the council to establish clearer certainty on how the SARMS will be funded and implemented as this work progresses. (Natural England)
Welcome the ambitious 20% BNG and advise that this target should be evidence based and shown to be achievable. (Natural England)
EA notes a missed opportunity in the IDP to explicitly reference river re-naturalisation and de-culverting to improve flood resilience and biodiversity, and they encourage the council to establish a River Corridor Improvement Plan. (Environment Agency)
Specific text be added to the IDP to actively promote the EA's charged pre-application advice service for any developments proposed near main rivers, flood zones, and associated flood defence infrastructure. (Environment Agency)
EA provided direct text amendments for the IDP Part B Schedule covering flood infrastructure items FLO002 through FLO010, in addition to submitting three new Environment Agency projects for inclusion. (Environment Agency)
Regarding item FLO009 in the IDP Part B, EA highlighted that while a 100-year strategy is in development, a multi-million-pound Phase 1 "Pevensey Bay to Eastbourne Coastal Management Scheme" will be delivered between 2027 and 2037 to maintain protection levels. (Environment Agency)
Sustainable Drainage (SuDS) should be required for all sites. Development must also safeguard space for long term access and maintenance of SuDS and watercourses. (Pevensey & Cuckmere WLMB)
West Bexhill sites discharge into Pevensey Levels, where ageing pumps and high winter water levels mean drainage systems must be designed to operate during prolonged high flows. (Pevensey & Cuckmere WLMB)
Development within the Board's catchment (West Bexhill Growth Area, North Bexhill Growth Area, parts of Central Urban Area, Catsfield and Crowhurst) must consult early on discharge rates. Due to impermeable geology and high groundwater, large attenuation areas may be required, and water quality impacts on sensitive species must be carefully managed. (Pevensey & Cuckmere WLMB)
Development must be closely coordinated with the Water Resources Management Plan (WRMP) to ensure that long-term water supply can actually meet the demands of proposed housing growth. Currently, the WRMP24 does not reflect the significant uplift in the latest housing forecast figures. Consequently, it is unlikely we would be able to accommodate growth exceeding our WRMP24 forecast assumptions throughout the planning period. However, we will be updating our growth forecast for WRMP29 (South East Water)
Recommends a strict policy requiring new homes to meet a higher water efficiency standard (e.g., 110 liters per person per day) to mitigate the impact of growth in a known water-stressed region. (South East Water)
Emphasises that major new water supplies and infrastructure projects (like reservoirs or strategic mains) have long lead times; planning must be proactive to ensure supply is available before residents move in. (South East Water)
High-density developments increase localised pressure on the network. Robust policies are needed to manage this demand and ensure the existing infrastructure can be upgraded without compromising service to current customers. (South East Water)

Encourages early and ongoing consultation between developers and the water company to identify site-specific infrastructure needs before planning permissions are granted. (South East Water)
Strategic infrastructure planning must align with the water industry's five-year funding cycles (Asset Management Periods). Long-term infrastructure priorities must be identified and evaluated well in advance through strategic frameworks like the Drainage and Wastewater Management Plan (DWMP) and Water Resources Management Plan (WRMP). (Southern Water)
Water companies require planning certainty to justify infrastructure investments. Consequently, growth data linked to evolving local plans is only formally integrated into strategic five-year investment allocations once the local plan has been examined and officially adopted. (Southern Water)
To support efficient asset planning, Local Planning Authorities must routinely provide housing trajectories and five-year land supply data to Southern Water. (Southern Water)
The IDP should maintain a clear distinction between local and strategic funding streams. Site-specific network reinforcements should be funded directly by developers via connection infrastructure charges, while strategic expansions, such as upgrades to Wastewater Treatment Works, are funded through water industry business plans. (Southern Water)
Local plan policies must strictly enforce complete separation of rainwater from the foul sewer network to address climate change and urban creep. If new developments are allowed to increase surface water run-off into combined networks, it will directly erode the environmental capacity created by Southern Water's investments in its infrastructure to reduce storm overflow releases. (Southern Water)
Southern Water's representation includes lists of: relevant Wastewater Treatment Works scheduled for improvements; water supply assets identified for longer term water resource and supply adjustments; as well as specific catchments where surface water management and storm tank capacity solutions are being funded to reduce overflow spills. (Southern Water)
Support the use of an Infrastructure Delivery Plan (IDP) to coordinate infrastructure delivery and housing growth. (Homes England)
IDP should clearly distinguish site specific infrastructure from district-wide or growth-area infrastructure and reflect differing site constraints and viability. (Homes England)
Infrastructure requirements must be proportionate, evidence led and compliant with CIL Regulation 122, particularly for complex brownfield sites. (Homes England)
It is not clearly evidenced within the IDP or supporting evidence base that all development, including Hodson's Mill, would have an impact that would need to be mitigated by infrastructure items. (Homes England)
Hastings BC welcomes the updated IDP and seeks continued engagement. Refinement to the IDP is suggested. (Hastings Borough Council)
Notes a general lack of reference to joint cross-boundary infrastructure working between authorities in the IDP. IDP should include reference to cross-boundary provision, especially health services as over 50% of Rother's population living in rural or fringe areas with poor GP access. (Tunbridge Wells Borough Council)

Questions the suitability of Hurst Green for proposed growth in relation to its infrastructure capacity. (Tunbridge Wells Borough Council)
TWBC supports the proposed A21 road safety improvements, but notes there is no proposed scheme to improve congestion at Flimwell junction. Request more detail on plans to support growth at Etchingham, Robertsbridge, and Stonegate railway stations. (Tunbridge Wells Borough Council)
Lack of detail regarding how increasing secondary school place requirements will be met. (Tunbridge Wells Borough Council)
Developers should be required to include sports facilities in their plans. (Bexhill-on-Sea Town Council)
Rother IDP should align with Rye's local IDP. (Rye Town Council)
The NHS is devolving services from hospitals, and the plan does not seem to allow this. (Udimore Parish Council)
Make sure the phasing of healthcare, transport, sewerage, etc upgrade or delivery is in parallel with housing growth. Development must be phased to reduce the cumulative impact on infrastructure and amenity, eg. medical facilities, roads, construction noise, emissions, and traffic disruption. (multiple, inc. NHS Sussex)
Transport and movement must include ALL legitimate road users, especially vulnerable road users, which includes horse riders and carriage drivers. Sports & recreational facilities need to allow for riding schools and livery yards and, in areas where the demand is highest, community riding manèges. (British Horse Society)
The IDP is disproportionately focused on towns and neglects rural settlements, despite the fact that rural communities generate a significant portion of CIL receipts. Failing to meaningfully consult Parish Councils risks misaligning infrastructure with growth, already resulting in proposed sites in areas like Catsfield that have limited water supply and no sewage disposal. (Catsfield Parish Council)
Local road networks are already over-capacity and cannot support further traffic. Healthcare facilities and schools are currently full. Currently public transport, parking, broadband, power, water, sewerage, and drainage systems are insufficient for the scale of proposed new homes.
IDP should add coastguard service and dental services.
Make emergency preparedness a core requirement to ensure residents remain safe and services stay functional during a crisis. Ensure all development plans are reviewed by emergency services to maintain fast response times and clear evacuation routes.
Collaboration with infrastructure & service providers is required to ensure that infrastructure can support the projected population growth. In addition, RDC should maintain pressure on central government for more funding.
Without firm commitments from infrastructure providers or guaranteed funding mechanisms, the Plan risks permitting development ahead of essential infrastructure. This questions the Plan's deliverability. Some respondents also suggest that no development should take place until infrastructure and service improvement are in place.
Support for an evolving IDP that adapts as specific needs, locations, and timings become clearer. Given the high level of uncertainty, the IDP should remain flexible rather than being too rigid or detailed too early.

More focus on sustainable transport, mitigate congestion by expanding the public transport network and providing protected pedestrian footways. This include areas shared with Hastings.
Ensure infrastructure funding reaches villages to match housing growth.
Supports making infrastructure planning a central part of the Local Plan to ensure all new growth is properly supported
Serious concerns that local councils and highway authorities lack the necessary funding to deliver these essential improvements.
Specific solutions are needed for sites on district borders (like Hastings) where different local authorities use different systems for developer contributions.
Residents raised that South East Water has warned of supply vulnerabilities in connected network areas (e.g., Tunbridge Wells) due to housing growth; as Battle relies on the same water company, there is severe concern over water supply security for the proposed allocations.
A district-wide Viability Assessment is required to prove that housing and infrastructure goals are realistic, affordable, and deliverable.
Redirect developer investment toward converting empty town-center buildings (e.g., Devonshire Road and the old Post Office) into housing to support local economies.
A clear strategy is needed to stimulate economic growth and prevent the area from becoming an exclusive "retirees' destination." Economic planning must focus on creating demand and services that attract a younger demographic.
Residents raised that Southern Water has confirmed the Sewage Pumping Station is operating at maximum capacity; any additional connections will exacerbate insanitary conditions.
Accessibility of transport network must be addressed, particularly in rural areas. For example, Crowhurst railway station lacks viable step-free or non-car access for mobility-impaired residents, creating a total dependency on private vehicles.
Additional site-specific comments
BX28 - Land at Northeye
Object to requiring sports pitches provision at Land at Northeye (BX28). Requiring pitches at BX28 would undermine site deliverability, constrain housing capacity and conflict with brownfield first objectives. A consolidated sports pitch strategy elsewhere in West Bexhill would be more effective, viable and consistent with national policy. (Homes England)
BC1
The site BC1 is a flood field, development here is viewed as a high risk for local property flooding.
BX5
Development here is detrimental to the "thriving commercial sector" currently on site. Loss of parking will impact the broader Town Centre retail
PE5
PE5 is currently used as a community car park used daily by residents and business occupants; its removal will displace vehicles onto an already overflowing local road network. Site has limited sustainable travel options to essential services.

How the main issues have been considered

- Concerns from the public (including parish councils, residents and statutory bodies) regarding existing and future capacity of infrastructure — including utilities, water management and wastewater, transport and highways, and community facilities — addressed by inclusion of new Policy INF1: Strategic Infrastructure Requirements. This sets a positive and proactive approach to identify infrastructure required to support new development (and secure appropriate mitigation measures, where necessary) and to ensure its timely delivery including via CIL, planning contributions, grant funding and viability review mechanisms
- Inclusion of new Policy INF2: Transport Connectivity, Decarbonisation and Mitigation to embed the Vision and Validate transport approach aligning with East Sussex Local Transport Plan 4 (LTP4 2024–2050) and DfT Circular 01/22.
- New Policy INF2: Transport Connectivity, Decarbonisation and Mitigation also requires major developments to assess cross-boundary and cumulative impacts on key corridors (such as the A21 and A259) and engage with neighbouring authorities
- Preparation of further evidence documents, including a district-wide Viability Assessment, Transport Modelling, Green and Blue Infrastructure Framework Study, among others, to inform the Local Plan policies as well as the IDP. This ensures that planned growth is supported by suitable infrastructure.
- Reviewed and updated the Infrastructure Delivery Plan (IDP), an evolving, live document that will be updated as and when necessary to incorporate revised strategic transport modelling (National Highways, ESCC, KCC), education demands (ESCC), other utility asset management plans from various infrastructure providers (such as Southern Water, South East Water, etc.), as well as available funding mechanisms and updates on delivery process
- Inclusion of site-specific requirements in site allocation policies, where considered necessary

Question 6

Do you have any comments on the Council's assessment of the additional Development Strategy Options?

Main issues raised

A21 Corridor option - This option would have the most direct implications for the SRN. Proposed changes/improvements to any part of the SRN will require consultation with and approval from us. Furthermore, the full impact of this option is required to be assessed as part of the updated modelling, to be undertaken in compliance with the guidance set out in DfT Circular 01/2022 (National Highways).

A21 Corridor option - Further information and evidence required to support the option proposed and its deliverability, including detailed transport modelling and consultation with the relevant highway authorities (Tunbridge Wells Borough Council, Wealden District Council)
A21 Corridor option / development around Bexhill - The Council's supporting SA is not sufficiently clear in terms of the maximum quantum of development that has been proposed or assessed through this strategic option, in order to evidence that it has considered the maximum supply that could be achievable through the delivery of a new sustainable transport corridor. (Wealden District Council)
A21 Corridor option - On paper, the idea of extending A21 ribbon development is logical. However, ribbon developments, as seen elsewhere in Britain do not get people closer to transports. The effective strategy is spoke and hub. The developments in Battle greatly extend building which is far from the town and thus unwalkable and un-cyclable. Roads will be busier and buses will not solve the problem. Anyone more than a mile will not walk.
A21 Corridor option - Concerns on the focus on the A21 corridor. There should be more focus on the rail corridor - Etchingham, Robertsbridge, Battle, Crowhurst.
Unclear whether a significant quantum of development has been discounted owing to protected habitats sites, as demonstrated through the HRA. (Wealden District Council)
Strategic gaps option - Through RDC reviewing strategic gaps and development boundaries, there may be opportunities to promote further growth. This would assist RDC in maximising all available opportunities for development, recognising that RDC may be unable to meet its own housing need and that neighbouring authorities are similarly constrained (Wealden District Council).
Strategic gaps option – This option should be explored further, with a more permissive policy for development within strategic gaps where it will meet local housing need and maintain the purposes of the gap. (planning agent)
Strategic gaps option – Concerns that whilst this is not being progressed as a preferred option for the development strategy, that the draft Local Plan provides that this will not necessarily preclude future site allocations within the strategic or green gaps, or windfall development coming forward within them.
Strategic gaps option - This option should proceed and the reasons given for abandoning it do not chime with the achievement of the development targets the plan defines. Many of these reasons are well-meant, but the effect is to force unreasonable development targets onto areas which are technically totally unsuitable.
Strategic gaps option – the strategic gaps should be retained to prevent coalescence and for protection of habitats.
Development (village) boundaries - Village boundaries should be extended to enable more development within them and prevent encroachment into the countryside, and more rural areas; including by extending them beyond proposed allocations.
Development (village) boundaries - Extending village boundaries amounts to encroachment in the countryside and is harmful to rural villages/areas.
Development (village) boundaries - The review of development boundaries has included sites with a long history of refusal of development for very practical reasons, e.g. flooding.

The plan identifies greenfield sites for development yet fails to consider sustainable brownfield opportunities within the towns.
Development Strategy options as sensible overall, but the final choice needs to focus on places where new homes can actually be delivered. Some options rely too much on small or highly restricted areas, which would slow delivery and make affordable housing harder to provide. Options that direct growth to better connected areas or larger sites are more realistic and give housing providers a better chance of delivering the homes the district needs.
The areas between Mountfield and Robertsbridge, or between John's Cross and Staplecross are possible locations for a New Village. These areas could be well related to significant transport such as the railway and the A21. Such a "village" development may possibly be linked to Robertsbridge. Such a New Village development should include commercial and light industrial employment areas and appropriate social infrastructure to create a more balanced community.

How the main issues have been considered

- Inclusion of new Policy INF2: Transport Connectivity, Decarbonisation and Mitigation to embed the Vision and Validate transport approach aligning with East Sussex Local Transport Plan 4 (LTP4 2024–2050) and DfT Circular 01/22
- Prepared further detailed Transport Modelling evidence to assess impacts of planned growth and to inform mitigation measures, including consideration of the A21 road
- Further review and update of the development boundaries for settlements, taking into account the latest suite of site allocation policies

Question 7

Do you have any comments on the preferred approach for housing density shown in Figure 9, or on the updated Density Study (2026)?

Main issues raised

Proposed housing densities are too high and insufficiently reflective of local village and rural character. Respondents state that density ranges such as 25–45 dph or ~35 dph may be inappropriate in some settlements and out of keeping with existing settlement patterns or local character. (Battle Town Council, Rye Neighbourhood Plan Steering Group, Rye Town Council, Hurst Green Parish Council, Beckley Parish Council, Etchingham Parish Council, Fairlight Parish Council)

Calls for lower or more locally appropriate density ranges. Respondents propose lower density thresholds, settlement-specific approaches, or the use of average densities as a maximum (e.g. 10–15 dph, ≤25 dph, or ~40 dph in parts of Rye). (Hurst Green Parish Council, Beckley Parish Council, Battle Town Council, Rye Neighbourhood Plan Steering Group, Rye Town Council)

Density increases would harm village character and local distinctiveness. Higher densities are seen as eroding settlement character, causing developments to stand out, or resulting in suburbanisation. (Rye Neighbourhood Plan Steering Group, Rye Town Council, Beckley Parish Council, Bexhill Heritage)

Density approach inappropriate for the High Weald National Landscape and rural edges. Specific concerns are raised about edge-of-settlement sites and development within the High Weald NL requiring lower densities and sensitive transitions. (Hurst Green Parish Council, Rye Neighbourhood Plan Steering Group, Rye Town Council, Etchingham Parish Council, Rurban Estates / Catesby Strategic Land / DHA Planning (flexibility needed at rural edges))
Infrastructure capacity does not support higher densities. Concerns that roads, drainage, healthcare, sewerage and utilities cannot accommodate higher density development. (Rye Town Council, Rye Neighbourhood Plan Steering Group, Fairlight Parish Council)
Density strategy is too generic and does not reflect local context. Objection to using broad density bands or averages across settlement types; with a preference for a more context-led, site-specific approach. (Hurst Green Parish Council, Burwash Parish Council, Taylor Wimpey, Homes England, Southern Housing, Gladman Developments, Rurban Estates / Catesby Strategic Land / DHA Planning, Tunbridge Wells Borough Council)
Density should be flexible and design-led rather than fixed. Strong emphasis that densities must respond to site constraints, design quality, viability and deliverability. Some respondents highlight that masterplanning work on specific sites demonstrates that proposed densities can be achievable in principle, but must remain responsive to factors such as topography and landscape sensitivity. (Homes England, Southern Housing, Taylor Wimpey, Wates Developments, Gladman Developments, Rurban Estates / Catesby Strategic Land / DHA Planning, Tunbridge Wells Borough Council)
Support for preferred Option B (moderate higher densities). Some respondents support Option B as a balanced approach enabling more efficient use of land. (NHS Sussex, Southern Housing, Homes England, Exeter College, East Sussex County Council, Tunbridge Wells Borough Council)
A minority argue that densities should be increased further across the district to help address housing shortfall. This includes suggestions to increase village density ranges (e.g. up to 25–55 dph) where supported by evidence and local precedent. (Corbil Planning Ltd; Southern Housing (suggest higher village upper range of up to 55 dph))
Higher densities in Bexhill Urban Area should be increased to Option C levels. While supporting Option B, it is suggested that in the well-served Bexhill Urban Area, densities could be increased to around 150 dph (Option C), consistent with the approach in the emerging Eastbourne Local Plan for Eastbourne town centre. (Eastbourne Borough Council)
Concern about very high densities in urban areas (e.g. 110–125 dph). Particularly in smaller historic towns such as Rye and Battle, these densities are considered unrealistic and harmful. (Historic England; Rye Town Council – concerns regarding higher urban density assumptions in principle)
Settlement classifications (urban/suburban/rural) are inaccurate or unclear. Concern that definitions are arbitrary and used to justify higher densities. (Rye Town Council, Rye Neighbourhood Plan Steering Group)

Need for appropriate design approach and housing mix. Density should reflect traditional settlement form (e.g. smaller dwellings and tighter grain) and deliver a mix of homes. (High Weald AONB Unit, Homes England, Southern Housing)
Environmental and biodiversity concerns linked to higher densities. Higher densities may reduce on-site biodiversity net gain (BNG) and conflict with environmental policy objectives if not designed sensitively. (East Sussex County Council; High Weald AONB Unit – broader environmental/landscape concerns)
Preference for baseline / lower density approach (Option A). Some respondents reject higher density options entirely and favour a continuation of lower baseline densities.
Other specific technical / design considerations. Density should allow for: Sustainable design (solar orientation, water storage). Protection of affordable housing provision.
Car dependency and parking needs conflict with higher densities. In rural areas, high levels of car ownership are often required; higher densities reduce parking provision and increase congestion.

How the main issues have been considered

- Reviewed and updated strategic approach to residential density standards to reflect the distinctive character of historic towns of Battle and Rye, as per revised Policy LWL1: Efficient Use of Land and Appropriate Densities, together with updating of supporting text to aid policy implementation
- Prepared additional Landscape Sensitivity study to inform site allocation policies

Question 8

Do you have any comments on the Council's proposed Overall Development Strategy?

Main issues raised

The strategy provides for significant new and major development in the National Landscape, which is contrary to the NPPF and legislation (i.e., statutory duty to further the purposes of protected landscapes, including National Landscapes). Exceptional circumstances for major development in the NL have not been demonstrated.

At the broadest level, and notwithstanding the large area of Rother District that lies within the High Weald National Landscape, we therefore consider the allocations strategy at the broadest level would fail to comply with para 189 of the NPPF. Whilst we acknowledge the intention to seek to meet as far as possible the OAN, this must be carried out in the context of the limited scale and extent of development in National Landscapes required by the NPPF, and within the context of the 'great weight' to be given to conserving and enhancing their landscape and scenic beauty. This must also be delivered in the context of the High Weald AONB Management Plan 2024-2029. (High Weald AONB Unit).

The strategy focusses development on agricultural and greenfield land, which is contrary to national policy to seek to prioritise brownfield land and sites.
The strategy relies heavily on directing growth to locations and areas where necessary infrastructure provision is not confirmed or is inadequate to support the levels of development and growth planned. This includes (but is not limited to) infrastructure for transport, water and flood risk management, and community infrastructure.
Focusing development in Bexhill, Rye, Battle, and surrounding settlement clusters should be accompanied by proportionate planning for primary care, community health facilities, and social care infrastructure to meet the needs of a growing population (NHS Sussex).
Sustainable drainage a key consideration, particularly where significant new housing is proposed. The complexities and challenges of drainage need a collaborative approach between the responsible organisations, such as Local Authorities, Southern Water, the Environment Agency and community groups to adapt the urban environment to be more resilient to our changing weather patterns. (Southern Water).
Objection to the overall strategy on the basis that it encourages ribbon development, settlement coalescence and potential loss of strategic gaps and green spaces.
Development strategy principles have not been applied consistently across the district – comments made with reference to specific site allocation proposals.
Figure 11: Rother Development Strategy - Key Diagram For completeness, this figure should include the Beachy Head East (Royal Sovereign Shoals) Marine Conservation Zone. Although the intended environmental interest coverage is not specified, it should be noted that Sites of Special Scientific Interest and Local Nature Reserves are also missing, so if these have been deliberately omitted, perhaps the addition of some text explaining the choice of environmental sites should be included by way of clarification. (Natural England)
The document should refer to a Vision-Led approach in relation to transport infrastructure, which can be reflected in the development strategy. (ESCC, National Highways)
Introducing a sustainable travel corridor along the A21 aligns with DfT Circular 01/2022 policy by encouraging walking, wheeling, cycling and public transport use as the natural first choice. However, we would again reiterate that the need for any SRN mitigation must be considered after all options have been assessed to maximise the accessibility by sustainable transport modes. There cannot be any presumption that SRN-related infrastructure to mitigate Local Plan impacts will be funded through a future government's Road Investment Strategy (RIS). Funding and delivery of necessary SRN infrastructure to support planned growth is a matter for the Local Planning Authority (LPA) to lead on through the Local Plan process. (National Highways)
The development strategy does not mention community-led development or community-led housing.
The strategy provides for a disproportionate amount of new development in Bexhill compared to other areas of the district.

Object to the Development Strategy on the basis that it seeks to achieve only a minimum of 7,881 dwellings by the end of the Plan period in 2042, below the LHN. Development strategy should do more to increase the supply of housing. Wording on 'sensitive' development and 'sensitive' growth should be deleted or modified as 'sensitive' is far too ambiguous and potentially misleading/ easily misunderstood. (Home Builders Federation, planning agents).
Where growth is proposed within or near historically sensitive towns, villages or assets that the Council should put in place appropriate policies to preserve the historic environment and that any opportunities to enhance heritage assets through development. Notes heritage has been considered as part of site allocations process. (Historic England)
The strategy repeats historic patterns of that have failed to deliver economic improvement. A new planned settlement should be explored.
Welcome discussion on the identified A21 growth corridor and further details of what the aspirations are for this area over the longer term. This should include ongoing engagement with Kent County Council Highways in particular, and with National Highways as the responsible body for the strategic road network. (TWBC)
Strongly suggest that the development strategy is revisited to further emphasise the intensification of existing urban opportunities and expand the scope for development within the National Landscapes which is inevitably going to be (planning agent)

How the main issues have been considered

- Infrastructure Delivery Plan reviewed and updated to identify infrastructure required to support levels of planned growth
- Inclusion of new Policy INF1: Strategic Infrastructure Requirements to set strategic approach for identifying and securing the timely delivery of new infrastructure
- Inclusion of new Policy INF2: Transport Connectivity, Decarbonisation and Mitigation to embed the Vision and Validate transport approach aligning with East Sussex Local Transport Plan 4 (LTP4 2024–2050) and DfT Circular 01/22.
- Policy SS1: Spatial Strategy for Rother amended to make clearer the protection of the HWNL as part of the overall Development Strategy
- Prepared additional Landscape Sensitivity Testing to inform site allocation policies
- Inclusion of an informative at front end of the Local Plan regarding how 'major development' in the HWNL will be determined via the planning application process
- Strategic Flood Risk Assessment updated and, together with latest Environment Agency information on flood risk, used to inform preparation of Development Strategy and site allocations

- Key Diagram updated to reflect revised Development (Spatial) Strategy, together with inclusion of Beachy Head East Marine Conservation Zone and informative about other environmental designations not shown on the Key Diagram (but included in the Policies Map)

Question 9

Do you have any comments on the proposed growth opportunities in the sub-areas as shown in Figure 10

Number of respondents: 48 / Number of comments: 53

Main issues raised

Object to the proposed growth. distribution across the sub-areas as it is not clearly aligned with infrastructure capacity, environmental constraints or settlement sustainability. Significant levels of new housing are directed to Battle, Northern Rother and village-based clusters where public transport, road capacity, healthcare, drainage and water supply are already limited.

It has been noted that many of the proposed development sites would have or have the potential to have an impact upon existing footpaths, bridleways etc.

Sustainable drainage a key consideration, particularly where significant new housing is proposed. The complexities and challenges of drainage need a collaborative approach between the responsible organisations, such as Local Authorities, Southern Water, the Environment Agency and community groups to adapt the urban environment to be more resilient to our changing weather patterns. (Southern Water).

Concerns over the lack of employment provision made in various sub-areas, particularly in light of the amount of new residential development proposed. This includes comments made in relation to Rye, Battle and northern Rother areas.

Comment that there is a high and disproportionate amount of employment provision made for Rye, given the size of the settlement and resident population.

Growth figures for Northern Rother should be increased, with reference to suggested site allocations that should be included in the plan (planning agent).

Objections to and comments on growth figures, signposting lack of or inadequate infrastructure to support the levels of growth and development planned.

Scale of development proposed will harm the historic character of existing settlements or adversely impact on their local identity, distinctiveness, etc.

Because much of Rother contains National Landscape, existing villages and towns are being required to absorb unsustainable/excessive amounts of new development.

Amount of growth proposed in sub-areas still falls below identified local housing need, and the local plan should consider additional opportunities and site allocations to facilitate housing development (planning agents).

Question as to whether the proposed level of growth in the Northern Rother sub-area is suitable given its existing infrastructure. The proposed level of growth in the sub-area has significantly increased above the range provided in the previous Regulation 18 consultation. This sub-area is proposed to support the second highest level of growth in the district. (TWBC)

The cumulative impact of the potential development sites are fully considered in the supporting documents. (TWBC)

How the main issues have been considered

- Housing and Economic Land Availability Assessment reviewed and updated to provide up-to-date evidence of land that is suitable, available and achievable for housing and economic development, and growth figures for the sub-areas updated on the basis of this evidence
- Infrastructure Delivery Plan reviewed and updated to identify infrastructure required to support levels of planned growth, together with inclusion of new policies to set the strategic approach for identifying and securing infrastructure (i.e., INF1: Strategic Infrastructure Requirements and INF2: Transport Connectivity, Decarbonisation and Mitigation)
- Further evidence base prepared to consider flood risk from all sources, including Strategic Flood Risk Assessment and consideration of latest Environment Agency data on flood risk
- Cumulative impacts of planned development across the district and sub-areas, including site allocations, considered through the preparation of new technical evidence such as Transport Modelling evidence and Sustainability Appraisal

Question 10

Do you have any comments on the proposed Vision and development strategy for Bexhill, including the development figures shown in Figures 13 and 14? (Please note that comments on individual sites should not be made in response to this question, please see questions 17 and 18 instead)

Number of respondents: 24 / Number of comments: 28

Main issues raised

Support the Vision and Development Strategy for Bexhill, particularly the focus on sustainable growth, brownfield development and “Live Well Locally” communities. Concentrating development in west and north Bexhill, alongside urban intensification, will create well-connected, accessible neighbourhoods close to services, transport, and facilities. The proposed 4,764 dwellings and 54,672 sqm of employment floorspace is appropriate to meet local housing and economic needs (NHS Sussex)

For development to be sustainable, Southern Water believes that it must always deliver sustainable drainage. This will be particularly important in areas where higher housing densities are proposed (Southern Water)

It is evident that the proposed development strategy will place additional strain on the Strategic Road Network in this area and this will need to be fully assessed through the updated modelling work being undertaken to support the draft Local Plan. There cannot be any presumption that new road infrastructure or

improvements will be funded by National Highways. Other funding mechanisms will be required (National Highways).
The vision for Bexhill should include reference to: 'wheeling' in relation to walking and cycling routes; electric vehicle charging infrastructure to support a shift towards the uptake and use of electric vehicles. the opportunities for rail and bus service and infrastructure improvements; Where sustainable transport options are referenced include 'integrated' as part of this text (ESCC Transport and Highways).
Paragraph 6.3.2, point 4: include additional text where it states 'across Bexhill as a whole (including key transport hubs, specifically Bexhill rail station) (ESCC Transport and Highways).
Opportunities set out in para 6.32 align with the draft Local Nature Recovery Strategy (LNRS) and are therefore supported. Any ecological enhancements to Combe Valley Countryside Park should have regard to LNRS priorities and measures. Proposals to improve access should be sensitively designed to avoid impacts to biodiversity, including disturbance and other recreational impacts. Using the site for both recreation and BNG may not be compatible (ESCC Ecology)
Currently there is spare capacity in early years settings and primary schools in the town. However, the high volume of housing proposed for Bexhill together with a general upswing in future births will begin to put pressure on existing provision during the plan period. In terms of secondary school capacity, the volume of new homes planned for the area combined with an upturn in the birth rate, could put pressure on places later in the plan period and lead to the need for additional secondary school capacity (ESCC Education)
The vision is silent on the role and importance of the cultural offer centred on the Grade 1 listed De La Warr Pavillion, which is reflected in Policy BX2 but could also be incorporated into the vision for the town also (Historic England)
Support retaining the strong strategic green gap between Bexhill and Hastings, which is essential to prevent coalescence and protect the Combe Valley Countryside Park (Hastings Borough Council)
As the town is the most sustainable location within Rother District, we query whether the maximum opportunities have been identified and assessed (Wealden District Council and others)
It is unclear whether any additional work has been undertaken to further test the deliverability of a new sustainable transport corridor at West Bexhill. WDC welcomes continued joint working on assessing the impacts of significant growth within the West and North Bexhill area, as any long-term solution could involve development of a new transport corridor on land within both Rother and Wealden District and could provide strategic transport interventions that would enhance development opportunities in our respective planning areas (Wealden District Council)
Support the consistency in policy approaches for sustainable drainage within the hydrological catchment of Pevensey Levels SAC and Ramsar Site and reference in the vision to Bexhill playing an active role in the Pevensey Bay to Eastbourne Coastal Management Scheme (Wealden District Council, Eastbourne Borough Council)
Support the approach to Bexhill in principle on the basis that it is the District's main settlement and therefore one of the most sustainable locations for new development (Homes England and others).

Welcome the inclusion within the vision to reference to improving station capacity. Sites close to Bexhill station should be maximised where possible (Network Rail).
Support the introduction of “Bexhill Urban Core” to allow for denser development in a sustainable allocation, however its extent should be assessed and based on suitable evidence.
The residential figures are too high, compared to the employment floor space.
The A259 trunk road, especially at Little Common, is already at capacity and could not cope with this further growth.
A bypass is required at West Bexhill between the A259 and Ninfield Road.
Too many green spaces are being proposed for development.
Development is of too large a scale and will harm the character of the town and its landscape setting.
Brownfield land should be prioritised for development.
Too much strain on local infrastructure.
Support demolition and appropriate rebuild of 19th and early 20th century housing in the town centre to provide good quality high density housing.
Walkable neighbourhoods, good pavements, adequate parking and separation of cyclists and pedestrians is required.

How the main issues have been considered

- Housing and Economic Land Availability Assessment reviewed and updated to provide up-to-date evidence of land that is suitable, available and achievable for housing and economic development, and growth figures for the sub-areas updated on the basis of this evidence
- Southern Water comments are addressed through Policies ENV3 and ENV4.
- Wording added to address comments of ESCC Ecology
- Wording updated to address comments of ESCC Transport
- Wording added to address comments of Historic England
- Plan and Sustainability Appraisal updated to address comments of Wealden District Council
- Comments of Eastbourne Borough Council considered but the minimum density set out in Policy BX1 has been retained, noting this is a minimum
- Transport modelling has been progressed to address the comments of National Highways, along with ongoing liaison with NH
- The Combe Valley Countryside Park (CVCP) is subject to adopted Local Plan policy, and the Plan carries this forward
- The plan supports appropriate brownfield development, but sites cannot be allocated for development unless they are available

- The potential for a West Bexhill bypass has been further explored with ESCC and National Highways, but those organisations has confirmed it is not in their plans and there is no reasonable prospect of its delivery through the Plan period.
- Some greenfield development is necessary to meet the need for housing; however, brownfield development is supported
- The potential for a rail halt at Ravenside has been explored with Network Rail but NR has confirmed there are no plans for this at present. Network Rail's recently published East Sussex Coast & Marshlink Strategic Study confirms that NR would not support it because it would extend the journey times for more people than would use it
- Residential and employment figures are both evidenced through the Local Plan and have been updated further since the Regulation 18 consultation
- Housing and Economic Land Availability Assessment provides the evidence base for discounting or taking forward sites.

Question 11

Do you have any comments on the proposed Vision and development strategy for Southern Rother and the Hastings Fringes, including the development figures shown in Figures 17 and 18? (Please note that comments on individual sites should not be made in response to this question, please see questions 26 to 35 instead)

Number of respondents: 13 / Number of comments: 14

Main issues raised

Support Vision and Development Strategy (NHS Sussex, Southern Housing, Hastings Borough Council, and others).

It is essential that primary care infrastructure is considered and enhanced to ensure new residents have access to health services (NHS Sussex).

Include reference to a 'Vision and Validate' approach as per the NPPF (ESCC Transport and Highways).

Mention the opportunities for electric vehicle charging infrastructure (ESCC Transport and Highways).

Acknowledgement that some of the proposed sites for allocation require more detailed consideration of impacts, including cumulative impacts is welcomed (ESCC Ecology).

Also support the justification for no sites proposed for allocation in Pett Parish or other Hastings Fringes settlement areas (ESCC Ecology).

Major development may not be appropriate (Southern Housing).

Should be more pro-growth and more development should be planned for given the proximity of many settlements to Hastings.

Vision and Development Strategy support development on greenfield sites over brownfield sites and therefore sprawl into the countryside.

Increased numbers in Crowhurst may not be suitable due to sustainability reasons.

Roads around Rock Lane and Austin Way are not suitable.

Development near Marsham Valley could impact flooding and nearby SSSI and Ramsar sites.

How the main issues have been considered

- Housing and Economic Land Availability Assessment reviewed and updated to provide up-to-date evidence of land that is suitable, available and achievable for housing and economic development, and growth figures for the sub-areas updated on the basis of this evidence
- Vision and Validate approach reflected in new Policy INF2

Question 12

Do you have any comments on the proposed Vision and development strategy for Battle and surrounding settlements, including the development figures shown in Figures 20 and 21? (Please note that comments on individual sites should not be made in response to this question, please see questions 36 to 41 instead).

Number of respondents: 30 / Number of comments: 30

Main issues raised

The vision balances sensitive residential and employment growth with the conservation of the High Weald National Landscape and the historic character of Battle. The proposed growth is broadly appropriate, reflecting the relative sustainability of settlements within the sub-area and supporting local services and economic vitality. Where new housing is planned, it is essential that primary care infrastructure is considered and delivered. (Primary Care Estate Officer)

Deliverability concerns in Sedlescombe; dwellings have been allocated and approved, but no meaningful commencement since NP was adopted. Recently completed dwellings have not sold.

Number of new dwellings for Battle does not reflect demographic needs of the town; Battle has an aging population that needs to downsize, which means larger homes coming to market which helps future housing need. Number of new dwellings will alter character and social balance of Battle as a small, historic market town.

These settlements are rural where public transport is limited or non-existent; these will not be affordable homes, proposed site allocations will only likely provide expensive houses that are not suitable.

Lack of infrastructure; GP surgeries, dentists, water supply, power supply, schools

Level of proposed growth is all in HWNL which supports habitats and ancient woodland, which will be destroyed by further development. NL land should not be used for development of any kind.

Support the Council's approach as they have considered alternative locations and are prioritising growth in the most relatively sustainable parts of the District. (Southern Housing)

Roads not suitable or safe for level of growth, particularly Battle High Street, Hastings Road, Catsfield. Traffic calming measures should be put in place where new development is located.

The National Planning Policy Framework (NPPF) stipulates that major development in National Landscapes should only be permitted in exceptional circumstances and where it is in the public interest. The proposed strategy fails to meet this threshold.
Smaller settlements in the area, like Catsfield and Sedlescombe, do not have the public transport infrastructure nor level of service provision to make proposed housing considered sustainable.
Support the approach, but tourism-based development also needs to be considered to support further economic growth based around tourism within the area. (Corbil Planning Ltd)
Support the vision for Battle, preserving the town's historical character. The Council's evidence base highlights the significant historic sites and train connectivity here. This aligns with the NP objective to enhance tourism. There is an opportunity to strengthen this approach, to promote protect Battle's cultural heritage and support the local economy. (Historic England)

How the main issues have been considered

- Housing and Economic Land Availability Assessment reviewed and updated to provide up-to-date evidence of land that is suitable, available and achievable for housing and economic development, and growth figures for the sub-areas updated on the basis of this evidence
- Infrastructure Delivery Plan reviewed and updated

Question 13

Do you have any comments on the proposed Vision and development strategy for Rye and the Eastern Settlements Cluster, including the development figures shown in Figures 23 and 24? (Please note that comments on individual sites should not be made in response to this question, please see questions 42 to 52 instead).

Number of respondents: 60 / Number of comments: 62

Main issues raised

The second paragraph needs to refer to wheeling alongside walking and cycling. Also reference Rye rail station, including the opportunities for improved access from the station to settlements, key services, facilities and education / training by walking, wheeling and cycling. (ESCC)

p.84 - The commitment to promoting key tourism areas such as Camber is welcomed. Although consideration should be given to the impact of increased visitor numbers on the local community and ecology. (ESCC)

Rye station has some step free access which could be further improved, and consideration needs to be given to the impact on the level crossing at Ferry Road. (Network Rail)

The end development figures should be reconsidered following the ongoing site assessments. This is to ensure a balance is struck between the impact on the HWNL and meeting the housing and other needs of communities and the District as a whole. (Southern Housing)

There is a need for more employment within walking/wheeling distance of the main outer suburbs of Rye. (Rye NP Group/ Rye TC)
Beckley PC would welcome the opportunity to work with the District Council to identify sites around the village that could be used to meet the quota of houses. Sites in Kings Bank, Horseshoe lane, Church Lane, Rectory Lane and Stoddards Lane, currently outside the development boundary, would allow small pockets of development to meet targets whilst minimising traffic impacts. (Beckley PC)
A disproportionate number of housing allocation for Peasmarch considering its sewage capacity. (Fairlight PC)
4 of the 5 sites are built on green fields which is not sustainable development. Developers understate the wildlife in the area (see photo) (Peasmarch PC)
- The 'commercial centres' are all on one site and part of one enterprise. The PC think that undue weight has been placed on the existing services of Jempsons. It has the services mentioned but is shut on a Sunday, it may not be viable in the future and it's an expensive option for a large part of the village demographic. The shop, café, PO, pharmacy and petrol station are all owned by one family. If they go, there is nothing, this is not sustainable. (Peasmarch PC and others)
Paragraph 6.66 should be amended to reflect the full range of designations applied to Dungeness, Romney Marsh and Rye Bay, which is an SAC and SSSI as well as SPA and Ramsar Site. This area is of national and international conservation importance. (SWT)
Paragraph 6.72 should be amended to reflect the full range of designations applied to Rye Harbour Nature Reserve, which is part of the Dungeness, Romney Marsh and Rye Bay SSSI, SPA, SAC and Ramsar site. (SWT)
Housing numbers do not seem to have been allocated with any thought to balance, consideration of existing infrastructure or the required investment needed to support the proposed increased housing/ Even with RDC's 2022 acceptance of PDNP with modest < 50 new homes to help integrate newcomers, the school, for example, could not support more. No provision is mentioned for new incomers/ children. Its difficult for them to integrate comfortably. (Brede Parish Council and others)
The allocation of new homes to Peasmarch is out of proportion to the village's size and capacity, increasing the population by 15–20% when the UK is projected to rise by only 7% by 2040/ The allocation of new homes to Peasmarch is totally out of proportion to the existing size of the village and its' capacity to absorb additional development/ How can local GPs and dentists and schools support such a change in the number of people requiring their services.
The description of Beckley does not mention that where reliance is on services situated in neighbouring villages access is restricted unless by car.
Any further improvements for walking and cycling in this area must include equestrians too. Active travel is defined by Transport for South East thus, "Active travel refers to walking, wheeling (e.g. mobility aids, children in prams), cycling, scooting and horse-riding." (British Horse Society)
Rural communities include equestrians. Additional pressures on riding schools and livery yards mean that they need to be included alongside the support for "smaller rural based businesses". (British Horse Society)

There is little evidence that the best interests of the residents have been considered and their views used as the foundation to in develop a deliverable aspirational vision for all and a coherent, implementable strategy to deliver that vision.
The high development figures, such as over 140 homes in Peasmarch alone overburden small rural villages, contradicting objectives for climate resilience and landscape protection in the HWNL
The strategy's cluster approach assumes connectivity, but limited bus services undermine this, leading to car dependency and reduced quality of life. More cars equal more noise and pollution affecting inhabitant and wildlife.
Preserve Rye's historic character.
Support tourism and industry where there is a lack of.
Site allocations now proposed for several high-risk Flood Zone 3 locations and one site (PL2) would connect Rye to Playden -- one reason a neighbouring site development was formerly rejected by both RDC and the Planning Inspectorate.
Rye Neighbourhood Plan firmly supports the continuance of green gaps between Rye and surrounding villages like Playden.
Expansion of East Guldeford would have a significant impact on views of Rye when approaching along the A259. Playden should not have been given site allocations due to its historic character. Please protect historic villages and act to prevent settlement coalescence.
The development figures in the strategy lack clear justification and do not align with the infrastructure-led principles of national policy or with the Peasmarch Neighbourhood Development Plan. No evidence is provided to show that required mitigation measures, such as transport upgrades, drainage improvements, or utilities expansion, are deliverable or financially viable.
The site allocations for Rye town are considered inadequate to meet identified housing need and further sites should be considered/allocated to address this. (Martello Developments)
The Peasmarch NDP was devise after significant and democratic consultation with villagers – why is RDC not using this?
Homes should be in small developments. By proposing a further 91 houses over the PNDP, this does not take local views into account.
Additional site-specific comments
Peasmarch already has more social and low cost housing than many East Sussex villages, past experience at The Maltings saw few local people houses there, with many coming from Hastings and further/ No mention of locals having first dibs at any housing to come, as has been the case. Housing authorities need to be reined in re allocation of incomers, not all whom are content here.
The Maltings business units were originally meant to support small local businesses, yet costs have risen so much that locals like myself can no longer afford them. These units will not be offered to local people.

How the main issues have been considered

- Housing and Economic Land Availability Assessment reviewed and updated to provide up-to-date evidence of land that is suitable, available and achievable for

housing and economic development, and growth figures for the sub-areas updated on the basis of this evidence

- Infrastructure Delivery Plan reviewed and updated

Question 14

Do you have any comments on the proposed Vision and development strategy for Northern Rother, including the development figures shown in Figures 26 and 27? (Please note that comments on individual sites should not be made in response to this question, please see questions 53 to 63 instead)

Number of respondents: 33 / Number of comments: 37

Main issues raised

Support Vision and Development Strategy (NHS Sussex, Southern Housing, Wealden District Council)

Introducing a sustainable travel corridor along the A21 aligns with DfT Circular 01/2022 policy by encouraging walking, wheeling, cycling and public transport use as the natural first choice. (National Highways)

There cannot be any presumption that SRN-related infrastructure to mitigate Local Plan impacts will be funded through a future government's Road Investment Strategy (RIS). Funding is a matter for the LPA to lead on through the Local Plan process. Interim statement (2025/2026): "While RIS3 has yet to be agreed, it is likely that investment will be increasingly focussed on maintaining and renewing the existing Strategic Road Network, including replacing and renewing major bridges, viaducts and other structures." (National Highways)

Include reference to a 'Vision and Validate' approach as per the NPPF. (ESCC Transport and Highways)

How RDC will support sustainable travel in the case funding does not come forward for the A21 sustainable travel corridor? (Tunbridge Wells Borough Council)

Increased walking and cycling is an aspiration that ignores constraints of distances and no footways to connect to train stations.

Ensure reference to bus services in the Vision. Should set out a strategy for bus route connectivity to these railway stations (ESCC Transport and Highways, Tunbridge Wells Borough Council)

RDC should report on the car parking capacity at Etchingham, Stonegate and Robertsbridge stations. (Tunbridge Wells Borough Council)

Numbers of new dwellings for Hurst Green, Flimwell and Burwash is queried. The percentage of new dwellings at Etchingham and Robertsbridge is 45% of Northern Rother sub-area. TWBC question if there is scope for further development at Etchingham rather than some of the less sustainable villages. (Tunbridge Wells Borough Council)

Housing targets are top down, and have not been validated through bottom up analysis to link planned growth to actual local demand, local employment or planned infrastructure.

It is essential that primary care infrastructure is considered and enhanced to ensure new residents have access to health services (NHS Sussex).

Acknowledgement that some of the proposed sites for allocation require more detailed consideration of impacts, including cumulative impacts is welcomed. (ESCC Ecology)
The vision should recognise that the need to maintain and enhance biodiversity as well as landscape character and farming capacity. (ESCC Ecology)
More reference required on how council will work with neighbouring authorities, including: Residents in Northern Rother are likely to use services in neighbouring authorities; stations identified as transport hubs are also important to Wealden residents, most notably Stonegate; cross-boundary funding where one authority uses CIL and another uses S106s; improved pedestrian connections are going to take place (Wealden District Council, Tunbridge Well Borough Council)
Paragraph 6.84 refers to the network of village primary schools but does not mention secondary school capacity. Reference should be made to working with KCC and ESCC. (Tunbridge Wells Borough Council)
TWBC questions the vision statement that 'local environmental impacts are lessened due to an increase in the uptake of electric vehicles and a corresponding increase in available EV charge points.' (Tunbridge Wells Borough Council)
Housing should be focussed on urban conurbations, or potentially new towns with matching facilities and infrastructure.
Vision is flawed as it relies on existing allocations that have not delivered. Bishops Lane, Robertsbridge should be allocated.
(a) Remove Hurst Green from the A21 Corridor Strategy; or (b) Reclassify Hurst Green as a lower-tier settlement where development is limited to meeting locally evidenced needs only.
Burwash needs starter homes and homes for older people.
Agree Robertsbridge is a 'good sustainability' settlement, but also query the appropriateness of the identified 1,200 sqm of new employment floorspace for Robertsbridge as set out in Figure 27. (Homes England)
Too many new homes proposed in Roberstbridge.
Vision should require development to be determined by the requirement to conserve and enhance landscape, scenic beauty and align with settlement form. Figure is therefore too high.
More care needed to preserve green wedges between settlements.
Expand Robertsbridge Development Boundary, while include infill in random fields between houses.
Site allocations and development proposals must demonstrate general conformity with made neighbourhood plans unless clear, evidenced and material considerations justify departure.
Ensure that traffic flows along A21 in summer are not affected.
Any developments along the A21 should include building in of cycle ways "behind hedges" alongside. Would also benefit horse riding.
6.13 and 6.86-6.87 should include reference to equestrianism which is 2 nd largest rural employer. (British Horse Society)

How the main issues have been considered

- Housing and Economic Land Availability Assessment reviewed and updated to provide up-to-date evidence of land that is suitable, available and achievable for housing and economic development, and growth figures for the sub-areas updated on the basis of this evidence
- Infrastructure Delivery Plan reviewed and updated
- Northern Rother vision changes are made to the sub-text which remove descriptive detail from the Regulation 18 document. These changes are made for legibility
- Added to 3.3: "Future growth will therefore need to be planned, having regard to impacts on neighbouring authority areas, including secondary school capacity and transport infrastructure, requiring ongoing cross-border working with relevant authorities."
- Added to 3.4: "Development proposals on sites adjoining or near to the A21 can contribute towards this objective by incorporating active travel connections within their site layouts where appropriate."

Question 15

Do you have any comments on the proposed Vision for the Countryside?

Number of respondents: 35 / Number of comments: 38

Main issues raised

We support the Vision for the Countryside, which prioritises sensitive development that meets local housing (including affordable housing), agricultural, economic, tourism, and community needs while protecting the rural character. Maintaining a working, living countryside is essential to support farming, healthy food production, and local rural economies, including opportunities for diversification. New development should be limited and carefully located to avoid adverse impacts on landscape, biodiversity, and heritage assets, and to support the long-term sustainability of rural communities. Where growth is proposed, consideration should be given to infrastructure requirements, including primary care, transport, and community facilities, to ensure residents can access essential services locally. Enhancing access, recreation, and leisure opportunities in the countryside should be balanced with protecting its intrinsic character and amenity value (NHS Sussex).

There is no reference to improving access to the countryside by active travel and public transport and supporting infrastructure (i.e. bus stop waiting facilities or cycle parking) (East Sussex County Council – Transport and Highways).

The vision should recognise the need to maintain and enhance biodiversity as well as landscape character and farming capacity (East Sussex County Council – Ecology).

The vision should recognise the need for the countryside to provide ecological function and connectivity, and more clearly encapsulate the fundamental role played by rural land in terms of natural capital and the ecosystem services that support our health, wellbeing and the economy (Sussex Wildlife Trust).

To create or maintain a "living, working countryside" requires a commitment to supporting sustainable rural communities. These rely on a well-balanced socio-economic and demographic communities. This is enabled via the provision of rural and community led housing in all villages regardless of their current size or number of facilities. 53% of the population of Rother live in rural areas, way above the national average (17%) or East Sussex average (26%) so there should be a stronger focus on the needs of rural communities. At present there are very few Registered Providers willing to engage with smaller rural schemes in Rother and the Local Plan could do more to incentivise them and others by supporting rural and community-led development.
"Local rural economies and farming will continue to grow sensitively over time, including through diversification" should mean diversification within an historical agricultural and rural context, and NOT extend to more industrial or commercial diversification (solar farms, industrial units loosely linked to production of things that might loosely be connected to / used in the countryside, etc).
The importance of sustainable agricultural business as business should not be lost with the drive for leisure and tourism.
Need to ensure support for local tourism does not degrade natural state of countryside with lights, infrastructure etc.
Public rights of way need improving which would help with active travel.
it is important that the Local Plan recognises the distinction between isolated development in the open countryside and small-scale development that is closely related to existing settlements. In appropriate circumstances, sensitively designed development on the edge of villages can help meet local housing needs, support rural communities and maintain the vitality of local services while still respecting the wider countryside setting. Having the blanket view that any land outside of the development boundary is "countryside" is reductionist, and means sites for development are being missed out on.
The continued allocation of sites, including Traveller sites, without evidence of delivery risks creating long-term planning blight rather than supporting sustainable rural communities. A more proportionate approach would focus on: Protecting landscape character; Supporting organic, needs-led growth; Ensuring allocations are genuinely deliverable
The statement that new development will be strictly limited is supported. Farms and coastlines should be protected and farming given priority.
The Vision is not being applied consistently, the proposed allocation of large greenfield sites in the countryside contradicts it.
The explanatory text is too focused on the production of food, whereas the countryside fulfils many other functions including agriculture, forestry, horticulture, equestrianism, recreation, carbon capture, flood control, energy infrastructure and water management, and this should be recognised. Forestry, horticulture and equestrianism feature strongly across Rother DC's landscape and are equally worthy of protection and promotion. Policies need to be flexible to incorporate developing land use priorities, that balance the visual character with a policy that meets the needs of a wide range of inhabitants and visitors.

The text should mention waterways, given the need to keep them in a good condition.
The Vision excludes the important but “non-productive” elements of the landscape such as scenery remoteness and tranquillity, land contours, viewpoints, ancient woodland, biodiversity, wildlife corridors, hedgerows, field patterns along with the existence and maintenance of green breaks between built areas.
The High Weald is a protected landscape and requires policies specific to its conservation and enhancement.
Concern with the impact of development on dark night skies.
Equestrianism is the second largest rural employer and so must be supported alongside other rural businesses. Equestrian tourism also flourishes where good off-road riding is available and (for day trips) good safe horsebox parking. Equestrian recreational and leisure facilities must therefore also be included.
There is no clear definition of “rural character” nor any agreed benchmark for determining how it will be measured.
The text lacks clarity. The use of 'strictly limited to' is suggestive of some form of stringent restriction, yet the list of types of developments that will be permitted suggests anything but being strictly limited.

How the main issues have been considered

- Inclusion of a new Policy SS4: Strategy for the Countryside to give further weight and clarity to the vision for the Countryside

Question 16

Do you have any comments on the proposed strategy for Gypsies, Travellers and Travelling Showpeople? (Please note that comments on individual sites should not be made in response to this question, please see question 64 instead)

Number of respondents: 9 / Number of comments: 10

Main issues raised

As with all forms of housing growth, the provision and capacity of Primary Care infrastructure must be considered to ensure that healthcare needs of travelling communities can be met (NHS Sussex)

It's important that any proposed sites are genuinely deliverable, have suitable access and services, and do not place unrealistic expectations on locations with known constraints.

The policy should include the requirement that the sites should not be on protected landscapes.

Sites should be located close to major link roads (A21, A259, A27).

It is important that traveller sites are approved through the normal planning application process.

There is no need for additional traveller sites.

How the main issues have been considered

- Site allocations can only be made on land that is available for this use. There is a need for additional traveller sites in the district, as shown by the East Sussex Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment. National planning policy requires the Council to meet the accommodation needs of this group through the Local Plan.
- Strategy updated to provide that windfall development may be used to help meet identified needs, in addition to site allocations
- Planning applications are determined in accordance with the Development Plan and national planning policy.

Site allocations

The following section of this Interim Consultation Statement covers representations made to the site allocation policies, which are set out by the five geographic sub-areas defined in the Local Plan. As set out previously, this covers the main issues raised through the representations and details as to how the Council has considered these in preparing the plan.

For all of the sub-areas and their respective site allocations, the Council has carried out a consistent approach in reviewing the representations and undertaking further work on the plan. This includes the preparation of evidence base documents and updating or refining the policy proposals. As such, there are a number of overarching ways in which representations have been considered, which should be read together with the remainder of this section, as set out below.

How main issues have been considered (site allocations overall)

- Reviewed and updated the Housing and Economic Land Availability Assessment to provide up-to-date evidence on land that is suitable, available and achievable for housing, economic and other types of development, including through engagement with landowners and developers
- Reviewed and updated the Housing and Economic Development Needs Assessment for up-to-date evidence of need
- Reviewed and updated the Infrastructure Delivery Plan, including through engagement with infrastructure providers and other key stakeholder, and used this to inform site-specific requirements where this was considered to be necessary

- Carried out Transport Modelling to consider impacts of planned growth and to inform necessary mitigation measures
- Reviewed and updated where appropriate the geographic extent of site allocation boundaries, the assumptions for developable area of land on sites, mix of land-uses and densities
- Carried out additional Landscape Sensitivity testing for a large number of sites, including those located in the HWNL
- Prepared and referred to new evidence to inform site specific consideration for flood risk

Bexhill

Question 17

Do you have any comments on the proposed site allocations in Bexhill? In your response, please state which site your comment relates to.

Number of respondents: 196 / Number of comments: 260

Main issues raised

Primary Care infrastructure must be considered alongside residential growth to ensure that healthcare provision meets the needs of the expanding population (NHS Sussex)

Detailed advice is provided on the requirements and expectations for: sites which would require a new access onto the Strategic Road Network (SRN) (the A259 in Bexhill), sites which propose to use an existing access into the SRN, sites which abut the SRN but take access onto the local road network, and sites located near the SRN (National Highways)

Southern Water request the addition of the following wording to all sites:
“We also encourage early engagement by developers who can make use of Southern Water’s pre-planning service here – <https://www.southernwater.co.uk/building-and-developing/planning-your-development/pre-planning-enquiries/>. Early engagement will be particularly important for the larger site proposals, or where constraints are indicated due to critical assets running beneath sites” (Southern Water)

Requirements for Sustainable Drainage (SuDS), drainage strategies and flood risk assessments are referred to inconsistently among the site allocation policies, this needs to be addressed. Sustainable Drainage should apply to all new development, not a select few within the local plan, for example BX20 correctly states that ENV 2 applies to the site while there is no mention of the policy in BX19. The location of SuDS measures within individual sites should not be dictated within the policy as there is no evidence to support the requirements. The scope for infiltration SuDS in the district is limited by a combination of high groundwater levels and impermeable geologies. This means that more space may be required for attenuation than previously thought by developers or landowners. Given this, we would support a level of flexibility being applied in the capacities being quoted for the site allocations (East Sussex County Council – Flooding, and Pevensey and Cuckmere Water Level Management Board)

There is no reference to the Pevensey and Cuckmere Water Level Management Board and its role in advising on development proposals within its catchment. Please ensure that this is referenced (East Sussex County Council - Pevensey and Cuckmere Water Level Management Board)
All major development applications (including brownfield sites) should be supported by a desk-based heritage impact assessment, including Historic Environment Record (HER) data, as required under NPPF 207 and SDS1 and SDS2. This is mentioned in relation to some sites but not all. The requirements for supporting heritage documentation for any proposed non-major development sites that are located within Archaeological Notifications Areas should be established by the applicant/agent via consultation with the County Archaeologist (East Sussex County Council – County Archaeology)
For all proposed allocated sites, and particularly those in suburban and rural areas, scheme design should be informed by Ecological Impact Assessments (EclA) and Ecological Constraints and Opportunities Plans (ECOPs) to ensure that appropriate mitigation for priority habitats and protected species is provided, and that biodiversity is built into the scheme rather than bolted on. This will help to embed the mitigation hierarchy in all schemes, as required by the NPPF. It is noted that some allocation policies refer to the need for ecological surveys, but not all, and there seems to be no consistency. Development, and most notably proposals for connectivity and biodiversity enhancements, should have regard to the emerging Local Nature Recovery Strategy (LNRS). Cumulative and in combination impacts on biodiversity should be taken into account. Many of the proposed site allocations overlap, are adjacent to or in close proximity to ancient woodland, and in some cases, larger buffers than 15 metres will be required especially for major residential developments which are likely to increase pressures on ancient woodland (recreational, garden escapes etc) and on protected species using them (e.g. increased predation by domestic pets). In addition to excluding residential gardens, buffers should also exclude other infrastructure including, but not limited to, footpaths/ cycle-paths, play areas, SuDS etc. It should also be recognised that not all green space can be used to deliver BNG, e.g. if buffers to ancient woodland or retained habitat for protected species are required as mitigation, this could help bring the development to no net loss, but may not be able to be included as BNG. Also, multiple requirements for open space, e.g. play areas, public access etc, may not be compatible with delivering meaningful BNG (East Sussex County Council – Ecology)
Early and ongoing cross-boundary engagement will be critical in ensuring that any development brought forward near the administrative boundary of Wealden district (particularly in Bexhill) is planned, justified and deliverable and does not result in unacceptable impacts on Wealden’s infrastructure or communities. It will be important to continue to engage on work being undertaken on our respective Transport Assessments for the Local Plan, as well as considering the outputs of the Wealden and Eastbourne Water Cycle Study, which will be factoring in the impacts of proposed growth in Rother (Wealden District Council).
SWT is concerned that there appears to be no overarching consideration of the cumulative impact of the numerous development proposals around the Pevensey

Levels. It is not clear how the area's natural capital can absorb this level of development and we urge Rother District Council to work with Wealden District Council to prepare a catchment plan of the whole area in order to assess the sensitivity of the wider region around the designated sites (Sussex Wildlife Trust)
Object to the amount of development proposed in Bexhill, which far exceeds the amount proposed in any other in Rother and is disproportionate.
Need to preserve strategic gap between Bexhill and St Leonards.
Building on greenfield sites within the Pevensey Levels Hydrological Catchment Area will have a detrimental effect on flood risk management, evidenced by the heavy prolonged rainfall of recent months. Have the implications of the Shoreline Management Plan including the projected rise in sea levels been considered?
The sewage system cannot cope with additional development off Barnhorn Road. Existing housing on Barnhorn Road already suffers from sewage problems, including foul water flooding, due to lack of capacity. The sewage pipe on Barnhorn Road is 9 inches in diameter and was due for replacement 30 years ago. It should be noted that Southern Water requests a condition on any planning approval if there could be an increased risk of foul flooding to reflect the fact that sewer network reinforcement will be required (by Southern Water) before new development can be occupied. This could involve a substantial delay in the occupation of development in West Bexhill.
Proposed development off Barnhorn Road will add significant traffic to a road which already experiences severe delays and congestion. The roundabout at Little Common is particularly difficult for both drivers and pedestrians due to the volume of traffic.
A bypass is required to reduce traffic on the A259 at Little Common before further development takes place. The West Bexhill Multi-modal Corridor Study (2022) considered options for a route connecting the A269 and A259, however this work has not progressed apparently due to the preliminary estimates of the cost not being thought to be affordable. The County Council should seek Government support as the need for this route arises from the need for new housing. If a route were to be constructed this could potentially open up further land for housing.
Development south of Barnhorn Road will cause pollution to the protected Pevensey Levels.
Development in West Bexhill will lead to light, noise and air pollution, harming the natural environment and local residents, and will adversely affect the amenity of residents adjoining the development sites including through loss of privacy and overlooking.
Infrastructure needs to be improved before additional development: schools, medical facilities, dentists, traffic management on A259, sewage system, public transport, water supply (new reservoir needed), emergency services, cycle provision (incomplete cycle lane on Barnhorn Road).
Object to building on greenfield land. Brownfield sites such as the old high school site and empty shops and banks in Bexhill town centre should be developed first.
Object to loss of agricultural land for reasons including impact on food production.
Construction will cause unacceptable disruption.
Many of the sites in West and North Bexhill are unsustainably located, far separated from services, facilities and public transport.

Loss of countryside will permanently change the rural character of the area
Loss of mature trees which help reduce carbon is unacceptable.
There are not enough jobs for all these additional people to work.
Developments delivered in Bexhill consistently fail to match the need. Developers often include “affordable housing” in initial plans, only to remove or reduce it later. The town does not require large numbers of high-end homes; local employment levels simply do not support this. What is needed is genuinely affordable housing for local people, not luxury homes aimed at buyers from outside the area.
Sidley needs more investment as there is nothing there to attract the additional people resulting from all the proposed development in North Bexhill.
Object to loss of car parks in the town, which will harm the town’s vitality.
Additional site-specific comments
BX5 - Land south-east of Beeching Road
Supports the draft allocation and proposed financial contributions towards public transport as within part v. This should specify the railway station as there are improvements that could be made. Given its proximity to the station, the draft allocation should consider increasing the density to meet the Government’s agenda of increasing development around railway stations (Network Rail)
200 homes in this area is excessive for such a small site.
Object to loss of the car park at Wainwright Road which is important in serving the town, local residents and users of the scout hall.
Object to loss of the scout hall as a community facility.
BX6 – Land adjacent to Bexhill Town Hall
The site may have limited local network capacity, and phasing of development may therefore be needed alongside network reinforcement prior to occupation of the total number of dwellings. In addition to the standard wording proposed for all site allocations, please include the following additional wording: “ <i>Occupation of development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider</i> ” (Southern Water).
Is there a definitive promotion of the site allocation to be car free? As there is no mention of a parking strategy for both the residential and office uses, there should be reference to this being a - development with an emphasis on the need to utilise/improve pedestrian/cycle use and access to public transport (East Sussex County Council – Transport and Highways)
BX7 – Sainsbury’s site, 1 Buckhurst Place
The site may have limited local network capacity, and phasing of development may therefore be needed alongside network reinforcement prior to occupation of the total number of dwellings. In addition to the standard wording proposed for all site allocations, please include the following additional wording: “ <i>Occupation of development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider</i> ” (Southern Water).
Network Rail supports the draft site allocation at part v which includes providing improved public transport infrastructure. The proximity to the railway means that a comprehensive masterplan should consider how to improve access to the station. Given its proximity to the station, development here should be maximised (Network Rail).

Object to loss of car parking. Sainsburys and its car park should be retained as a significant amenity for the town centre and local residents.
75 flats could not be built on the roof of the existing building.
Concerns about the access points to the flats and car parking on already busy road system.
Welcome enhancement to the street scene and new opportunities for retail and flats above in principle, but the policy lacks detail.
BX8 – Former Bexhill High School site
Plans must adopt a strategic approach through multifunctional green infrastructure provision and nature recovery networks. To this end, we welcome the incorporation of green and blue infrastructure provision within several of your site policies ... We also welcome the requirement within Site Policy BX8, that development ‘on this site must:...iv. Provide a Green Infrastructure framework that retains and enhances habitats, alongside sustainable drainage (SuDS) measures;...’ (Natural England)
Development here would disrupt a public right of way providing safe and direct access to King Offa Primary School, relied upon by children, parents and residents.
Development here will significantly increase traffic at peak times creating safety risks for children and parents using the adjacent school.
The land is at risk of flooding and is already waterlogged.
BX9 – Land south of Terminus Road
Southern Water infrastructure crosses site BX9 and may require easements or diversion. For this site, and any we’ve previously requested layout wording please include the following wording: “ <i>Layout of the development must be planned to ensure future access to existing sewerage infrastructure for maintenance and upsizing purposes.</i> ” (Southern Water).
Network Rail notes the proximity of the railway to the south of the draft allocation. Suitable boundary fencing and noise mitigation measures will be required to protect future occupiers. Additionally, some land to the eastern boundary of the draft allocation is owned by the railway. It appears this land falls within the red line of the draft site allocation. NR would be willing to discuss if this land is necessary and how this could support the delivery of the allocation (Network Rail).
BX10 – 30 Dorset Road
The draft site allocation is near the railway and suitable boundary fencing and noise mitigation measures will be required. The red line of the draft allocation appears to be close to, and incorporating, NR land. NR would be willing to discuss if this land is necessary and how this could support the delivery of the allocation (Network Rail).
Site could be used for more high-density housing, sustainable location.
BX11 – Rear of 11 Endwell Road
No significant site-specific comments.
BX12 – 2a Sackville Road
The draft site allocation is near the railway and suitable boundary fencing and noise mitigation measures will be required. There are current issues of a collapsing wall impacting on the railway at the site. Engagement with NR from early in the process is essential (Network Rail).
BX13 – Eversley Road Car Park

Object to loss of car parking, which will result in congestion on surrounding roads and negatively impact businesses in the town centre. The car park is well-used, including by users of the nearby over 55s Club and for other meetings and gatherings, including Bexhill Town Council which promote accessibility for the communities of all ages to help them socialise and to prevent isolation and loneliness.
As owner of the site, the Council has a conflict of interest and should not be selling off assets to balance its books.
BX14 – Land west of Fryatts Way
This representation is submitted in support of the proposed allocation of the Land West of Fryatts Way as set out within Policy BX14. It reinforces Persimmon Homes' firm commitment to bringing the site forward for residential development at the earliest opportunity (Landowner)
Far too big a development on beautiful fields, which will be lost forever.
BX15 Land north of Broadoak Lane
Improvements to public footpaths do not necessarily upgrade a footpath to a bridleway so having a policy section (3) that is specifically requiring a route suitable for cyclists may not be achievable. There is a surfaced route that links to Foxhill, but even then, that may be limited to being used on foot due to its width, with cyclists having to dismount. Contributions towards public transport should be included given there is a poor presence of buses and this would allow funding to be available for the Flexibus service (East Sussex County Council – Transport and Highways)
Object – this green space should remain with the community for use as public open space. A local charity had expressed an interest in taking it on as a green space and had submitted a business plan to the Council in 2022.
Fryatts Way is not suitable to accommodate access for a further 35 homes, on top of the 210 homes already being built on the adjacent site. The surrounding roads are narrow lanes, Ellerslie Lane has no pavements and is dangerous for pedestrians.
The supporting text incorrectly states the field is not publicly accessible.
Building here would be contrary to a covenant relating to the whole of Broad Oak Park which prevents development.
BX16 Land west of Pages Lane
Policy requirements broadly supported but it is recommended that vegetation along the southern boundary is retained and enhanced to maintain a green corridor along the road (East Sussex County Council – Ecology).
The draft site allocation is near the railway and suitable boundary fencing and noise mitigation measures will be required (Network Rail).
The site is used by protected species and valuable wildlife habitat. Trees should be considered for Tree Preservation Orders. The site should be designated as a wildlife sanctuary.
The site is a natural habitat containing only a small amount of development and to define it as “brownfield” is questionable.
BX17 81 Cooden Drive
No significant site-specific comments.
BX19 Gorses Car Park and Open Space, The Gorses

The draft site allocation is near the railway and suitable boundary fencing and noise mitigation measures will be required (Network Rail).
Object to the loss of the car park. It is not correct that there will be adequate on-street parking to serve Cooden beach station if this car park is lost. The car park is frequently full. The loss of the car park will discourage people from using the train, contrary to the sustainability objectives of the Local Plan. It is also used by people accessing the beach and nearby hotel when there are events on.
Object to loss of green space and natural habitat.
The wording of policy criterion (ii) is left too open, in that the habitat could be destroyed if moved to another location.
The loss of the car park will increase parking on surrounding roads, creating dangerous conditions for cyclists and making it difficult for the community bus to get through.
The proposed density is too high and out of keeping with the surrounding development.
There is likely a problem with the sewage outflow system in this area because there is a detectable unpleasant odour by this site.
BX20 Land off Spindlewood Drive
There is a typographical error in the site name (East Sussex County Council – Transport and Highways)
The green corridor is considered essential for maintaining connectivity for habitats and species, and this should be prioritised over public access and recreational use (East Sussex County Council – Ecology)
The site is suitable, available and achievable for development, with the intention of bringing forward housing delivery early within the plan period. As such, the site's continued allocation and its inclusion within the emerging Local Plan is supported (Landowner).
Access onto Barnhorn Road through Barnhorn Manor Farm is dangerous. The proposed principal access has serious deficiencies and the current planning application has an outstanding objection from National Highways for this reason.
The site suffers from surface water flooding and there is an outstanding objection on these grounds to the current planning application.
Protected species use the site.
The nearby Barnhorn Manor dates back to the middle ages, will provision be made for an archaeological survey?
BX21 Land north of Barnhorn Manor Caravan Park
There is a typographical error in the site name – Barnhorne or Barnhorn (East Sussex County Council – Transport and Highways).
Persimmon Homes support the proposed allocation but notes that the site has the capacity to accommodate at least 30 dwellings when assessed against the proposed density objectives and efficient land use principles (Landowner).
Access onto Barnhorn Road through Barnhorn Manor Farm is dangerous. The proposed principal access has serious deficiencies and the current planning application at BX20 has an outstanding objection from National Highways for this reason. The site cannot be allocated because the BX20 junction cannot safely

accommodate additional traffic. National Highways already capped acceptable numbers at 160 dwellings, which would be exceeded.
The site suffers from surface water flooding.
The site contains asbestos, disturbing it will risk public health.
Protected species use the site .
Object due to impact on designated heritage assets, Barnhorn Manor and the cottage. The Manor dates back to 772 and has strong connections to Battle Abbey, with the actual building being moved before 1305. A positive strategy for the historic environment in Local Plans should ensure that site allocations AVOID harming the significance of both designated and non-designated heritage assets, including effects on their settings. Great weight should be given to the asset's conservation. Will provision be made for an archaeological survey?
BX22 Land south of Barnhorn Road
The site may have limited local network capacity, and phasing of development may therefore be needed alongside network reinforcement prior to occupation of the total number of dwellings. In addition to the standard wording proposed for all site allocations, please include the following additional wording: <i>“Occupation of development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider”</i> (Southern Water).
The policy text could be amended to “preserve or enhance the significance” of the listed building with the site rather than simply referring to the setting (Historic England).
Richborough supports the allocation of the site in principle. However, the current drafting does not yet strike the right balance between setting a clear framework for delivery and allowing the site to come forward in the most effective and sustainable way. Specifically: 1. The site can accommodate a greater number of homes through a range of housing densities in different character areas; 2. The allocation should be flexible in relation to access. Several primary access options are being tested, each connecting to Barnhorn Road. The policy should leave the final form of access to be resolved through further technical work. 3. 3,000sqm of employment floorspace or an equivalent alternative commercial or tourist use should not be applied rigidly, the policy would be more effective if it retained flexibility for the final commercial offer to be shaped through the next stage of testing. 4. Richborough supports the principle that the wider West Bexhill Growth Area should deliver a broad range of community facilities and supporting infrastructure. At present, however, there remains insufficient clarity as to which site is expected to provide which element, and how those responsibilities are to be shared fairly across the wider growth area. Until that work is further advanced, the allocation should avoid being overly prescriptive about the precise form of community provision to be delivered on this site (Land promoter).
Access onto Barnhorn Road through Barnhorn Manor Farm is dangerous. It is unclear where the proposed access would be, but the access to BX20 and BX21 has serious deficiencies and the current planning application at BX20 has an outstanding objection from National Highways for this reason. Without a safe

access that meets national highways standards, the site is not deliverable and should be removed.
The site has very high groundwater levels and suffers from surface water flooding
The site will need three phases of SuDS, there is insufficient space within the site to accommodate this having regard to its topography
Site extends to the edge of the Pevensy Levels SSSI and will adversely affect the protected sites including water levels within them.
Protected species use the site including great crested newts within two ponds
Adverse impact on the rural setting of the town and views towards the sea
Object due to impact on designated heritage assets, Barnhorn Manor and the cottage. The Manor dates back to 772 and has strong connections to Battle Abbey, with the actual building being moved before 1305. The site itself is also historically important, "Old Town Field" dates back to 1305 and was called Oldeton and is said to be the medieval village of Barnhorn. A positive strategy for the historic environment in Local Plans should ensure that site allocations AVOID harming the significance of both designated and non-designated heritage assets, including effects on their settings. Great weight should be given to the asset's conservation. Will provision be made for an archaeological survey?
Object to commercial development at this site which will harm the character of the area and increase heavy vehicles, compounding traffic issues.
BX23 Land north of Rosewood Park
Strong buffers along the southern boundary and to the ancient woodland should be required (East Sussex County Council – Ecology)
The site may have limited local network capacity, and phasing of development may therefore be needed alongside network reinforcement prior to occupation of the total number of dwellings. In addition to the standard wording proposed for all site allocations, please include the following additional wording: " <i>Occupation of development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider</i> " (Southern Water).
The draft site allocation should explore opportunities to provide contribution towards improving connectivity with the railway. The nearest station is Cooden however there is limited accessibility to the station with no obvious prospect for bus services to drop off/pick up close to the station. There is the potential for many occupiers to travel to Bexhill station which could put pressure on the existing car park at the station. Consideration is needed to determine how this need could be met (Network Rail).
This site received a resolution to grant planning permission in June 2025. Positive progress is being made with the signing of the S106 agreement and this is expected to be signed in the near future. We support the recognition of this by the identification of the site for allocation within the Local Plan (Land promoter).
The site does not have direct access to the A259. Proposed cycle paths do not extend to follow the A259.
The site is prone to flooding
The existing SuDS ponds within the site were built to serve the existing Rosewood Park estate, not this additional land.
We note that White Admiral, a priority species, primarily of woodland, and dependant on Honeysuckle as larval food, are recorded adjacent to sites BX23, BX24

and BX38, and could potentially occur in proximity to other sites. Ecological surveys should therefore also take account of the presence of this species (Sussex Butterfly Conservation).
BX24 Land east of Sandhurst Lane
The site may have limited local network capacity, and phasing of development may therefore be needed alongside network reinforcement prior to occupation of the total number of dwellings. In addition to the standard wording proposed for all site allocations, please include the following additional wording: <i>“Occupation of development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider”</i> (Southern Water).
Gladman support the identification of this site for the development of 68 dwellings. We will continue to demonstrate why it is a suitable location for housing growth and if any further information is required by the Council we would be happy to provide this (Land promoter).
There is no foul sewer capacity in Sandhurst Lane. The sewage from this area will have to be pumped to Barnhorn Road, but the existing 225mm sewer in Barnhorn Road has no spare capacity. Until several lengths of sewerage in West Bexhill are substantially reinforced by major reconstruction the development of BX24 cannot proceed to occupation.
The site has no access.
We note that White Admiral, a priority species, primarily of woodland, and dependant on Honeysuckle as larval food, are recorded adjacent to sites BX23, BX24 and BX38, and could potentially occur in proximity to other sites. Ecological surveys should therefore also take account of the presence of this species (Sussex Butterfly Conservation).
BX25 Land at Barnhorn Green
The policy refers to the need to involve the Lead Local Flood Authority (LLFA) in agreeing the drainage strategy, it is unclear why this site warrants such specific attention when the LLFA will review drainage strategies for all major proposals in line with its statutory duty (East Sussex County Council – Pevensey and Cuckmere Water Level Management Board).
Support the site to provide medical facilities.
Object to additional traffic at the Brookland Road junction.
With regard to light pollution, we note two sites that by nature of the proposal may require careful design for moths and other species; BX25 Land at Barnhorn Green for Medical centre/light industrial which requires “a sensitive lighting strategy to avoid impacts on protected species and neighbouring amenity” (Sussex Butterfly Conservation).
BX26 Land south of Sandhurst Lane
The site has no access.
Object to additional traffic at the Brookland Road junction.
BX27 Beeches Farm and land north of Barnhorn Road
Given the quantum of new homes proposed in the West Bexhill Growth Area, ESCC welcomes the inclusion in policy BX18 and, more specifically, BX27 (Beeches Farm and land north of Barnhorn Road), of a new primary school with early years nursery provision

to serve the West Bexhill area (East Sussex County Council – Education)
The site may have limited local network capacity, and phasing of development may therefore be needed alongside network reinforcement prior to occupation of the total number of dwellings. In addition to the standard wording proposed for all site allocations, please include the following additional wording: <i>“Occupation of development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider”</i> (Southern Water).
The policy text could be amended to “preserve or enhance the significance” of the listed building with the site rather than simply referring to the setting (Historic England).
The draft site allocation should explore opportunities to provide contribution towards improving connectivity with the railway. The nearest station is Cooden, however there is limited accessibility to the station with no obvious prospect for bus services to drop off/pick up close to the station. There is the potential for many occupiers to travel to Bexhill station which could put pressure on the existing car park at the station. Consideration is needed to determine how this need could be met (Network Rail).
Support the allocation. However, the extent of developable land is considered less than proposed in the draft policy. Landscape capacity work undertaken suggests that a significant amount of the northern part of the site will need to be left undeveloped and could be used as public open space, although may not be suitable for formal playing pitches which would require fencing, lighting, etc which could harm landscape character. Furthermore, while we do not doubt the need for a school, we suggest that this is best accommodated through a holistic masterplan approach (which could result in the school site being provided on another site). The topography of this site could be challenging for a school, which would require level land. The requirement for a post office and a bank is also considered too prescriptive to meet relevant soundness tests. Some vegetation will need to be removed to facilitate a safe vehicular access and the policy should allow for this. Sandhurst Lane or Coneyburrow Lane will need to have the ability to be used as an emergency access to the site. The policy requirement to protect the setting of the grade II listed buildings is ambiguous, as the setting is not defined (Land promoter).
There is no sewer in Sandhurst Lane or in Coneyburrow Lane. The foul water from this development will have to be pumped to Barnhorn Road but the existing sewers in Barnhorn Road have no adequate spare capacity.
The proposed access to the A259 would be dangerous and cause congestion because it would be adjacent to the new access required for site BX28 and would be on a hill.
Adverse effect on rural character and views from the north and west. The southern part of the site has been refused planning permission twice for much smaller developments, for reasons including unacceptable impact on local landscape character and views.
BX28 Land at Northeys and adjoining land
As this site is likely to be contaminated due to its previous uses as an RAF base and as a prison and training centre there should be policy text that stipulates the site should be fully investigated and, where deemed necessary, remediated. We would expect a PRA, often known as a Phase 1 Desk Study, to be provided with any

planning application for this site. We would recommend that prior to any development on site, including demolition, further consultation be undertaken with us. This site also lies adjacent of a Main River (GB107041012430 - East Stream), flood defences and includes areas of FZ2 and 3, as such we support policy 11 that the site is subject to a site-specific FRA and to avoid building in the north-western part of the site. We also support policy 14 to connect to mains and policy 12 to incorporate SuDs, as any development must not cause deterioration of the river, which is already rated as “Poor ecological status”. We are pleased to see the inclusion of policy 10 and support this also (Environment Agency).
Sport England is concerned that other parts of the site may not be suitable for sports pitches due to undulation/ gradients, ground conditions etc. A feasibility assessment by qualified agronomist is required, all sports facilities including sports pitches and ancillary facilities to be of at least equivalent if not better quality and quantity and to Sport England and relevant NGB design standards and specifications (Sport England)
The site may have limited local network capacity, and phasing of development may therefore be needed alongside network reinforcement prior to occupation of the total number of dwellings. In addition to the standard wording proposed for all site allocations, please include the following additional wording: <i>“Occupation of development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider”</i> (Southern Water).
Strongly support the re-allocation of Land at Northeys and its role within the West of Bexhill Growth Area, but object to combining it with adjoining parcels into a single allocation. The sites differ in ownership, levels, constraints and delivery timescales, and joint allocation risks delaying early delivery at Northeys. Separate allocations with site-specific policies would improve deliverability and plan soundness (Homes England – Landowner).
Specific comments made on draft policy criteria: (i) (affordable housing); (ii) (infrastructure provision); (iii) – replacement of “protection” with “sympathetic”; (viii) deletion of playing pitches; (xi, xiii, xiv) duplicate national policy requirements (Homes England – Landowner).
There is insufficient justification to include a requirement for Sports pitches within the BX28 allocation. In the context of a wider growth area strategy, Land at Northeys should not be the preferred location and a more strategic solution should be sought to ensure any future provision is well located and can benefit both new and existing residents. It will therefore be necessary for the next version of the Local Plan to set out an appropriate strategy for the delivery of sports pitches at West of Bexhill Growth Area without reliance on Land at Northeys, in order to prioritise it for the early delivery of housing and maximising the reuse of a previously developed site (Homes England – Landowner).
There is no foul sewer capacity in Coneyburrow Lane. Foul sewage from the additional houses in this development area will have to be pumped to Barnhorn Road but the existing sewer in Barnhorn Road is of very limited capacity.
The proposed access to the A259 would be dangerous and cause congestion because it would be adjacent to the new access required for site BX27.

Concerns with proximity to Pevensey Levels. A major artery running into the Pevensey Levels (East Canal) runs along the northern flank of the site. Consequently, the site must have swales, a SuDS and a filtering attenuation pond to ensure no polluted water can enter the East Canal or any its tributaries.
Support the development of the brownfield site but no greenfield land should be included as these parcels are very sensitive.
The recreational space including a sports ground should be provided. A school could be supported here.
With regard to light pollution, we note two sites that by nature of the proposal may require careful design for moths and other species; BX28 Land at Northeye and adjoining land: some 384 dwellings; community uses which could include outdoor sports facilities including formal playing pitch(es) (Sussex Butterfly Conservation).
BX31 Land at Kiteye Farm
The site may have limited local network capacity, and phasing of development may therefore be needed alongside network reinforcement prior to occupation of the total number of dwellings. In addition to the standard wording proposed for all site allocations, please include the following additional wording: <i>“Occupation of development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider”</i> (Southern Water).
BX32 Land west of Watermill Lane (south)
Properties in Mayo Rise own part of the road outside their houses, development will damage the road.
BX33 Land west of Watermill Lane
No significant site-specific comments.
BX34 Land east of Watermill Lane
The site may have limited local network capacity, and phasing of development may therefore be needed alongside network reinforcement prior to occupation of the total number of dwellings. In addition to the standard wording proposed for all site allocations, please include the following additional wording: <i>“Occupation of development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider”</i> (Southern Water).
Requirement for bus service contributions should be added to the policy (East Sussex County Council – Transport and Highways).
This site is allocated in the adopted Local Plan. Gladman has submitted an outline application (RR/2025/699/P) on part of this site for 99 dwellings, which is currently pending consideration expected to be determined by delegated powers in the near future. This site is deliverable and should be retained as an allocation within the emerging Local Plan (Land promoter).
BX35 Land at Levetts Wood and Oaktree Farm
We support the retention of the remaining parts of this employment site, which has started to develop at pace following the completion of key services infrastructure to the site. There are however several ways in which we would suggest this policy may be improved to allow for a more responsive delivery of employment space in line with market demand. These include:

1. Removal of the site-wide master plan and site wide strategy ambitions from policy. Suggesting that the development will need to be re-planned despite established infrastructure and layout patterns across the site, will create unnecessary risk and complexity within the planning process that will be a deterrent to interest in the remaining parcels.
2. Increase the proposed development density from 25% to around 40% (for industrial) or higher (for offices), this would bring the plot ratios in line within the normal commercial development density range seen across the country.
3. Add Phase 3 back into the draft allocation (the southern-most parcel). This appears to have been omitted in error, because the planning permission for the scheme currently being constructed on the adjoining part of the site includes buildings in this area, but they are not being constructed. As this part of the site is not contiguous with the remainder of BX35, it could be a separate allocation (Landowner).

BX36 Land north of Haven Brook Avenue (east)

The site may have limited local network capacity, and phasing of development may therefore be needed alongside network reinforcement prior to occupation of the total number of dwellings. In addition to the standard wording proposed for all site allocations, please include the following additional wording: *“Occupation of development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider”* (Southern Water).

Amendments to the draft policy are required as follows: (4) change the reference to local highway authority, rather than East Sussex Council; (5) does not make sense -there is a shared footway/cycleway on the east side of Watermill Lane (not western) which connects to a Pegasus crossing to Watermill Lane south on Haven Brook Avenue. Additional crossing points may be required (East Sussex County Council – Transport and Highways).

The allocation is adjacent to a Local Wildlife Site (LWS) and the policy should therefore stipulate a requirement for development to avoid any adverse impacts to, and protect and enhance, the LWS in accordance with NPPF paragraph 192 (Sussex Wildlife Trust).

Adverse impact on the adjacent caravan and camping park which will be surrounded by a massive housing estate.

Access via Watermill Lane is not feasible due to a public right of way and crossover point and existing street furniture, also dangerous due to 60mph speed limit.

Haven Brook Avenue was supposed to be the northern extent of the town, harmful to extend into the countryside beyond. Adverse landscape impact as the site is topographically high.

Gladman are promoting the eastern half of this proposed allocation and support its identification. We will continue to demonstrate why it is a suitable location for housing growth and we would appreciate the opportunity to discuss this site with the Council (Land promoter, eastern section).

The northern part of the proposed allocation is controlled by Catesby Estates. Representations are supported by a Transport Technical Note, a Heritage Note and a Landscape and Visual Assessment. The site is considered suitable, available and achievable for a residential-led development to commence within the first five years of the Plan (Land promoter).

Minor amendments to the draft policy are requested as follows: 1. The draft allocation site should be extended to include a small additional area to the north in the same ownership. 2. Part (iv) should be amended to provide for vehicular access from Haven Brook Avenue AND/OR Watermill Lane, to reflect the fact that it is likely that two separate vehicular entrances will be required to the site, having regard to its strong natural boundaries, topography, and scale of the allocation. 3. Part (ix) should be amended to say “Minimise the harm to” the setting of Cockerels Farmhouse “through sensitive design, landscaping and layout”, rather than “protect the setting of”, as there is likely to be some unavoidable impact on the asset’s historic setting, which would need to be weighed against the public benefits of the allocation (Land promoter, northern section).
Additional land to the north of the site could be included to enable delivery of a primary school with early years provision, as referenced in our response to Question 18 (Land promoter, northern section).
BX37 Land north of Haven Brook Avenue (west)
In view of the volume of new homes proposed in the North Bexhill Growth Area, ESCC supports the inclusion of a new primary school with early years nursery provision in policy BX29 and, more specifically, either BX37 (Land north of Haven Brook Avenue (west)) or BX39 (Land west of Ninfield Road) (East Sussex County Council – Education)
The site may have limited local network capacity, and phasing of development may therefore be needed alongside network reinforcement prior to occupation of the total number of dwellings. In addition to the standard wording proposed for all site allocations, please include the following additional wording: “<i>Occupation of development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider</i>” (Southern Water).
Criterion (6) of the policy should include extension of the Non-Motorised User (NMU) provision on the north side of Ninfield Rd/Haven Brook Avenue to connect the site. This could be a shared footway cycleway based on earlier discussions on infrastructure improvements (East Sussex County Council - Transport and Highways)
Haven Brook Avenue was supposed to be the northern extent of the town, harmful to extend into the countryside beyond.
BX38 Land west of Ninfield Road roundabout
The site may have limited local network capacity, and phasing of development may therefore be needed alongside network reinforcement prior to occupation of the total number of dwellings. In addition to the standard wording proposed for all site allocations, please include the following additional wording: “<i>Occupation of development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider</i>” (Southern Water).
Amendments are required to the policy as follows: (2) remove the word “or”; developers will be asked to deliver infrastructure and contribute to service enhancements for buses and potentially schemes that have been designed but not fully funded; (5) re-word to read pedestrian and cycling infrastructure to allow linkage between the site and existing network infrastructure or network

infrastructure that has been otherwise secured (East Sussex County Council – Transport and Highways)
Support the allocation. The site is available and suitable and can be delivered within the first five years of the plan period. The proposed capacity and density is appropriate. The proposed policy requirements are achievable and proportionate. Vehicular access can be achieved from Ninfield Road. The retention and enhancement of existing landscape features, protection of ecological assets, and delivery of a multifunctional green infrastructure corridor are all capable of being integrated without compromising the developable area or site viability (Site promoter).
Support the site, this is a natural extension to Bexhill.
We note that White Admiral, a priority species, primarily of woodland, and dependant on Honeysuckle as larval food, are recorded adjacent to sites BX23, BX24 and BX38, and could potentially occur in proximity to other sites. Ecological surveys should therefore also take account of the presence of this species (Sussex Butterfly Conservation).
BX39 Land west of Ninfield Road
In view of the volume of new homes proposed in the North Bexhill Growth Area, ESCC supports the inclusion of a new primary school with early years nursery provision in policy BX29 and, more specifically, either BX37 (Land north of Haven Brook Avenue (west)) or BX39 (Land west of Ninfield Road) (East Sussex County Council – Education)
The southern area of this allocation lies within a Minerals Consultation Area (MCA) and Waste Consultation Area (WCA) for Ashdown Brickworks. Ashdown Brickworks is operational and is permitted to continue to operate until 2051. However, should the working not be completed by this date, the operator could apply to extend this. It is one of only a few brickworks in the county and its continued operation is essential for the supply of bricks for construction projects in the area. It is also considered as a safeguarded waste site owing to the brick recycling operation that also takes place on site. Therefore, Policies RM3, SP6 and WMP6 of the Waste and Minerals Local Plan apply. These policies seek to safeguard against development non-minerals development and ensure that where non-waste development is proposed, account is taken of the need to safeguard waste management capacity and avoid constraining its operation. The brick clay quarry operates a campaign method of extraction, where quarrying occurs for short intense periods, which then is used in a more consistent production of bricks. Brick clay is worked from the quarry in phases. There remains a significant amount of brick clay to be extracted and, according to approved plans, extraction, and the following restoration, within the northern phase (closest to site BX39) is yet to commence. Based on the existing boundary of BX39, it is considered that the winning and working of minerals (around the edge of the existing quarry) and within the MCA could be curtailed, and the allocation may also fail to provide adequate living conditions for the occupiers of the proposed dwellings within it. On this basis, the proposed allocation for housing and associated infrastructure as reflected by the concept masterplan details, which show housing being located within the 100m MCA/WCA, is likely to receive an objection from the Minerals Planning Authority. It is recommended that the supporting text to this policy identifies the MCA and WCA and associated

safeguarded minerals and waste development as a constraint. It is advised that the allocation boundary should be amended to avoid being in such proximity to Ashdown Brickworks. We also expect reference to consultation taking place with the MPA regarding development and master-planning of the proposed allocation under BX39. If a buffer is to be used by the allocation, then this must show accurately the 100m distance proposed, which reflects the same boundary as the MCA/WCA (East Sussex County Council – Waste and Minerals Planning Authority)
The site may have limited local network capacity, and phasing of development may therefore be needed alongside network reinforcement prior to occupation of the total number of dwellings. In addition to the standard wording proposed for all site allocations, please include the following additional wording: <i>“Occupation of development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider”</i> (Southern Water).
For information, the site is currently subject to a highway pre-app for the southern part of the site, no school has been included. Criterion (7) should be reworded to read: “provide pedestrian and cycling infrastructure to allow linkage between the site and existing network infrastructure or network infrastructure that has been otherwise secured.” (East Sussex County Council – Transport and Highways)
Adverse impact on tourist accommodation (caravan/ camping park), which will harm the local economy.
This stretch of Ninfield Road is already hazardous with drivers driving too fast. Further development will worsen this. It will also have an adverse effect on adjacent narrow lanes (Peartree Lane and St Mary’s Lane) which are unsuited to any additional traffic and are hazardous, particularly for pedestrians.
We strongly support the inclusion of Policy BX39, reflecting its alignment with strategic growth in North Bexhill and its suitability for a landscape-led mixed-use extension to Bexhill and the Lunsford’s Cross area. The draft policy supports up to 500 dwellings, or 445 dwellings alongside a one-form entry primary school with early years provision, together with retail, community facilities and a mobility hub. While a residential-led mixed-use scheme is deliverable, we have concerns regarding the appropriateness and timing of a primary school on this site. BX39’s western edge location would not meet the objective of walkable access for most pupils, and evidence shows sufficient surplus primary places to accommodate early growth. A standalone, more centrally located alternative school site is therefore preferable and available within the plan period (Land promoter).
It is requested that policy criterion (v) is reworded to state “not include vehicular access from Peartree Lane other than for emergency access”, as this will be necessary, given the size and orientation of the site (Land promoter).
BX40 Land at Freezeland Farm, Freezeland Lane
No significant site-specific comments.
BX41 Former Sidley Sports Ground
The site may have limited local network capacity, and phasing of development may therefore be needed alongside network reinforcement prior to occupation of the total number of dwellings. In addition to the standard wording proposed for all site allocations, please include the following additional wording: <i>“Occupation of</i>

<i>development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider” (Southern Water).</i>
Are there any policies relating to access? Will sports and recreational uses share the same access? There is also no mention of pedestrian/ cycle infrastructure or parking (East Sussex County Council – Transport and Highways)
The supporting text fails to recognise that the site was also used by Sidley Cricket Club and Sidley Social Club (in addition to Sidley United Football Club). Provision of a 3G football pitch would not support the needs of the cricket or social side of the old club.
Support the development of the site on the basis that it comprises housing and a recreational use, i.e. a 3G sports pitch.
Object to the loss of the green space here which supports nature and protected species.
Building on the site will increase flooding, which already affects residential properties bordering the site down-slope.
BX42 Land adjacent to 276 Turkey Road
No significant site-specific comments.
BX43 Cemetery Lodge, 250 Turkey Road
No significant site-specific comments.
BX44 Our Lady of the Rosary Church, Southlands Road
No significant site-specific comments.
BX45 Land at Worsham Farm (East)
ESCC acknowledges reference in policy BX45 to the ongoing need for a new primary school with early years nursery provision to serve the development at Worsham Farm (East Sussex County Council – Education)
Allocations BX45-49 are close to Combe Haven SSSI, ancient woodland and LWS. Large portions included in ACIB with measures mapped for woodland, rivers, streams and aquifers and urban nature and nature networks. Public open spaces should be positioned carefully to ensure no recreational impacts on APIB features. A master-planning approach is welcomed (East Sussex County Council – Ecology)
The allocation overlaps with a Local Wildlife Site (LWS) and the policy should therefore stipulate a requirement for development to avoid any adverse impacts to, and protect and enhance, the LWS in accordance with NPPF paragraph 192 (Sussex Wildlife Trust)
BX46 Land at Worsham Farm (West)
Allocations BX45-49 are close to Combe Haven SSSI, ancient woodland and LWS. Large portions included in ACIB with measures mapped for woodland, rivers, streams and aquifers and urban nature and nature networks. Public open spaces should be positioned carefully to ensure no recreational impacts on APIB features. A master-planning approach is welcomed (East Sussex County Council – Ecology)
BX47 Plot 7, Bexhill Enterprise Park, Mount View Street
Allocations BX45-49 are close to Combe Haven SSSI, ancient woodland and LWS. Large portions included in ACIB with measures mapped for woodland, rivers, streams and aquifers and urban nature and nature networks. Public open spaces

should be positioned carefully to ensure no recreational impacts on APIB features. A master-planning approach is welcomed (East Sussex County Council – Ecology)
The following additions are required to the policy criteria: (1) include contributions to bus services (2) and make reference to the highway Authority (East Sussex County Council – Transport and Highways)
The allocation is adjacent to a Local Wildlife Site (LWS) and the policy should therefore stipulate a requirement for development to avoid any adverse impacts to, and protect and enhance, the LWS in accordance with NPPF paragraph 192 (Sussex Wildlife Trust)
Support the proposed widening of the allocation to include all commercial uses including retail, given that the site has been marketed for conventional office and industrial type employment uses for an extended period of ten years, during which time demand has been limited. The retail evidence to support the local plan under-estimates need for new retail floorspace. The contributions sought through the draft policy are not specific and are excessive, given contributions made in previous phases of the wider development. Strongly oppose proposed criterion (7) to make car and cycle parking available for visitors to the Combe Valley Countryside Park (CVCP) because this would be a deal-breaker for future occupiers and funders of the site who must be able to limit third party users of the car park. A car park could be provided on an alternative site within the CVCP, owned by the same landowners. Oppose criterion (9) because the site is already more than 15 metres away from the ancient woodland (Landowner).
BX48 Bexhill Enterprise Park - Escarpment Site B, south of Glovers End
Allocations BX45-49 are close to Combe Haven SSSI, ancient woodland and LWS. Large portions included in ACIB with measures mapped for woodland, rivers, streams and aquifers and urban nature and nature networks. Public open spaces should be positioned carefully to ensure no recreational impacts on APIB features. A master-planning approach is welcomed (East Sussex County Council – Ecology)
We welcome the addition of this site to the employment allocations in the area. Most criteria set out within the policy as proposed are appropriate. The site offers a logical expansion area for commercial developments in this location, comprising primarily of well screened land that is continuous with the existing employment developments. We would however note that the connection to Glovers Lane via the footbridge bridge appears to relate to site BX49, as site BX48 cannot provide the connection referred to as it is not continuous with the bridge with differing ownership structure. We would suggest that this requirement is removed and placed solely upon the developments within site BX49 (Landowner).
BX49 Land west of Bexhill Innovation Park, Glovers End
Allocations BX45-49 are close to Combe Haven SSSI, ancient woodland and LWS. Large portions included in ACIB with measures mapped for woodland, rivers, streams and aquifers and urban nature and nature networks. Public open spaces should be positioned carefully to ensure no recreational impacts on APIB features. A master-planning approach is welcomed (East Sussex County Council – Ecology)
BX50 Land at Sidley Car Park, Ninfield Road
Object to loss of public car parking which supports the viability of shops and businesses in Sidley.

Loss of car parking will remove a safe drop-off and pick-up point for the nearby primary school, and parking for the nearby youth club on Ninfield Road which is used by children with special education needs and disabilities. The loss of parking space would impact the hard work which has been done in recent years by East Sussex County Council and All Saints School to create a road safety scheme. Parents are no longer permitted to drive into Saints Lane at school drop off and pick up times so use Sidley car park. The school also runs 'walking bus' from the car park to the school gates.
Loss of car parking will result in increased traffic and parking on local roads.
Constrained site, would adversely affect the amenity of adjacent flats.
Construction period will mean the whole car park is out of action for an extended period which would have a significant adverse effect on Sidley.

How the main issues have been considered

Responses to general (non-site specific) comments

- Infrastructure needs are considered through the IDP, which has been reviewed and updated
- Additional text/ criteria added to policies for sites affecting strategic road network highlighting need to comply with National Highways requirements
- Additional text added to policies for sites close to Pevensey Levels to highlight sensitivities and requirements
- Reference to Pevensey and Cuckmere Water Level Management Board added to text for relevant site policies
- Comments of County Archaeologist addressed in Policy HER1
- Comments of Southern Water addressed in Policies ENV1-4
- Comments of County Ecologist addressed through policies ENV7-10
- Proximity of ancient woodland and ACIBs/ APIBs added to supporting text for relevant site policies
- An updated Habitats Regulations Assessment is being prepared to support the Regulation 19 plan which will consider effects on the Pevensey Levels
- Transport modelling is being undertaken to support the Regulation 19 plan which considers the effect of development on the road network, including the A259. ESCC and National Highways are involved with this process to determine necessary mitigation measures.
- The potential for a West Bexhill bypass has been further explored with ESCC and National Highways but those organisations has confirmed it is not in their plans and there is no reasonable prospect of its delivery through the Plan period.

Policy BX5 – Land SE of Beeching Road

- Addition to supporting text to acknowledge sensitivities around loss of public car parking
- Reference to scout hut removed as this is actually outside the site boundary

Policy BX6 – Land adjacent Bexhill Town Hall

- Additional policy criterion to address potential need for phasing to address sewerage network capacity issue
- Reference to car parking added to supporting text

Policy BX7 – Sainsburys site

- Additional policy criterion to address potential need for phasing to address sewerage network capacity issue
- Additional text added to highlight need to improve links to railway station

Policy BX8 – Former Bexhill High School

- Further detail added on flooding constraints and drainage requirements

Policy BX9 – Land south of Terminus Road

- Additional policy criterion to address need to plan for future access to Southern Water infrastructure
- Additional policy criterion to require fencing and noise mitigation on railway boundary
- Amendment to site boundary to remove area owned by Network Rail

Policy BX10 - Land at 30 Dorset Road

- Additional policy criterion to require fencing and noise mitigation on railway boundary

Policy BX11 – Rear of 11 Endwell Road

- N/A - no comments received

Policy BX12 - Land at 2a Sackville Road

- Additional policy criterion to require fencing and noise mitigation on railway boundary
- Additional supporting text to highlight need for engagement with Network Rail and collapsing wall issue

Policy BX13 - Eversley Road Car Park

- Amendments to policy criterion (iv) to require improvements to active travel connections and infrastructure

Policy BX14 – Land west of Fryatts Way

- This policy has been deleted because development at the site has commenced.

Policy BX15 – Land north of Broadoak Lane

- Additional policy criterion to require a replacement area of public open space
- Reference to cycle link deleted
- Supporting text amended to remove reference to the site not being publicly accessible, and to explain requirement for a replacement area of public open space.

Policy BX16 – Land west of Pages Lane

- This policy has been deleted because planning permission has been granted for an alternative use.

Policy BX17 – 81 Cooden Drive

- This policy has been deleted because development at the site has commenced.

Policy BX19 – Gorses Car Park and Open Space

- Additional criteria and supporting text added to highlight: need for Appropriate Assessment under the Habitats Regulations and flood risks on site
- Additional supporting text to highlight need for fencing and noise mitigation on railway boundary

Policy BX20 – Spindlewood Drive

- General updates to policy criteria and text to reflect updates made throughout the Plan

Policy BX21 – Land north of Barnhorn Manor Caravan Park

- Amendment to policy criterion and additional supporting text to highlight heritage sensitivities and need to protect the setting and preserve or enhance the significance of the Grade II Listed Building, Barnhorn Manor, Lower Barnhorne

Policy BX22 – Land south of Barnhorn Road

- Removal of specific requirement for employment floorspace and replacement with more flexible requirement to take account of the site's environmental sensitivities and impacts on vehicular traffic
- Additional text to highlight potential need for phasing to address sewerage network capacity issue
- Amendment to policy criterion and additional supporting text to address heritage sensitivities and need to preserve and enhance the significance of the Grade II listed building, Barnhorne Manor, Lower Barnhorne
- Additional Landscape Sensitivity Assessment undertaken and its recommendations reflected in text and policy
- Additional text on access requirements

Policy BX23 - Land north of Rosewood Park

- Additional text to highlight potential need for phasing to address sewerage network capacity issue
- Additional text to highlight biodiversity sensitivities and priority species

Policy BX24 - Land east of Sandhurst Lane

- Additional text to highlight potential need for phasing to address sewerage network capacity issue
- Additional text to highlight biodiversity sensitivities and priority species

Policy BX25 – Land at Barnhorn Green

- Additional flexibility added to policy to allow for a mixed-use residential and employment development in the event of the employment development not coming forward

Policy BX26 - Land south of Sandhurst Lane, Bexhill

- General updates to policy criteria and text to reflect updates made throughout the Plan

Policy BX27 – Beeches Farm and Land north of Barnhorn Road

- Additional text to highlight potential need for phasing to address sewerage network capacity issue
- Additional text and amendment to criterion to reflect heritage sensitivities and address comments of Historic England

- Additional Landscape Sensitivity Assessment undertaken and its recommendations reflected in text and policy
- Changes to policy requirements for clarity, replacement of specific wording with “class E units” and further clarity on community uses
- Additional text to highlight potential need for contributions towards improving connectivity with the nearest railway station

Policy BX28 – Land at Northeye and adjoining land

- Dwelling numbers reduced by 20 to reflect environmental constraints of site, particularly flood risks
- Additional criterion to address contaminated land issue
- Additional text to address playing pitch issue
- Additional text to highlight potential need for phasing to address sewerage network capacity issue

Policy BX31 – Land at Kiteye Farm

- Additional text added to Policy BX30 (overarching infrastructure policy) to highlight potential need for phasing to address sewerage network capacity issue

Policy BX32 – Land west of Watermill Lane (south)

- General updates to policy criteria and text to reflect updates made throughout the Plan

Policy BX33 – Land west of Watermill Lane

- N/A – no comments received.

Policy BX34 – Land east of Watermill Lane

- Additional text added to Policy BX30 (overarching infrastructure policy) to highlight potential need for phasing to address sewerage network capacity issue
- Additional criterion to highlight need for bus service contributions

Policy BX35 – Land at Levetts Wood

- Site plan expanded to include “missing” section
- Amendments to policy requirements to reflect the fact that part of the site has been built

- Increase in employment floorspace capacity to reflect a 40% ratio, in line with the recommendations of the Housing and Economic Development Needs Assessment update (2026)

Policy BX36 - Land north of Haven Brook Avenue (east)

- Additional text added to highlight potential need for phasing to address sewerage network capacity issue
- Amendments to policy criteria to address comments of ESCC Highways
- Amendment to policy criterion and additional supporting text to address heritage sensitivities and need to preserve and enhance the significance of the Grade II listed building, Cockerels Farmhouse
- Amendment to policy criterion and additional supporting text to address ecological sensitivities and proximity of Local Wildlife Site and ancient woodland

Policy BX37 – Land north of Haven Brook Avenue (west)

- Removal of option for primary school at this site as the site is unlikely to be suitable for this use due to its topography and other environmental constraints
- Additional text added to highlight potential need for phasing to address sewerage network capacity issue
- Amendments to policy criteria to address comments of ESCC Highways

Policy BX38 - Land west of Ninfield Road roundabout

- Additional text added to highlight potential need for phasing to address sewerage network capacity issue
- Amendments to policy criteria to address comments of ESCC Highways
- Additional text to highlight biodiversity sensitivities and priority species

Policy BX39 – Land west of Ninfield Road

- Number of residential dwellings reduced by 100 to address the fact that parts of the site will not be suitable for development due to proximity to the minerals and waste site at Ashdown Brickworks
- Option for school removed from the policy as the site is not considered ideally located, given its peripheral location in the North Bexhill growth area
- Additional criteria and supporting text to highlight the need for a Minerals Resource Assessment and address the comments of ESCC
- Additional text added to highlight potential need for phasing to address sewerage network capacity issue

Policy BX40 – Land at Freezeland Farm

- N/A – no comments received.

Policy BX41 – Former Sidley Sports Ground

- Additional text added to highlight potential need for phasing to address sewerage network capacity issue
- Additional text to highlight loss of community facility (the social club) and cricket pitch

Policy BX42 – Land adjacent to 276 Turkey Road

- N/A – no comments received.

Policy BX43 – Cemetery Lodge

- N/A – no comments received.

Policy BX44 – Our Lady of the Rosary Church

- N/A – no comments received.

Policy BX45 – Land at Worsham Farm (East)

- Additional text to address ecological sensitivities including ancient woodland and Local Wildlife Site.

Policy BX46 – Land at Worsham Farm (west)

- Additional text to address potential situation that retail unit is provided on another site prior to this site coming forward.

Policy BX47 - Bexhill Enterprise Park

- Increase in employment floorspace capacity to reflect a 40% ratio, in line with the recommendations of the Housing and Economic Development Needs Assessment update (2026)
- Clarification of employment use classes included in the allocation. A flexible approach is taken because evidence (HEDNA Update 2026) shows that there is currently a need for all forms of employment floorspace across the Functional Economic Area (FEMA) (Rother and Hastings)
- Minor changes to policy criteria to respond to comments

- Additional text to address ecological sensitivities including priority habitat and Local Wildlife Site.

Policy BX48 - Bexhill Enterprise Park – Escarpment Site B

- Increase in employment floorspace capacity to reflect a 40% ratio, in line with the recommendations of the Housing and Economic Development Needs Assessment update (2026)
- Clarification of employment use classes included in the allocation. A flexible approach is taken because evidence (HEDNA Update 2026) shows that there is currently a need for all forms of employment floorspace across the Functional Economic Area (FEMA) (Rother and Hastings)
- Additional text to address ecological sensitivities

Policy BX49 - Land west of Bexhill Innovation Park, Glovers End

- Increase in employment floorspace capacity to reflect a 40% ratio, in line with the recommendations of the Housing and Economic Development Needs Assessment update (2026)
- Clarification of employment use classes included in the allocation. A flexible approach is taken because evidence (HEDNA Update 2026) shows that there is currently a need for all forms of employment floorspace across the Functional Economic Area (FEMA) (Rother and Hastings)
- Additional text to address ecological sensitivities

Policy BX50 – Land at Sidley Car Park

- This policy has been deleted.

Question 18

Do you consider there are any other possible sites in Bexhill which should be allocated for development in the Local Plan?

Number of respondents: 16/ Number of comments: 17

Main issues raised

Could site BX7 (Sainsbury's site) be extended to build over the railway line up to Bexhill Railway Station? To allow the development office or residential accommodation, with access from Buckhurst Place and Devonshire Square.

The Ravenside Shopping Area has warehouse shops taking up large amounts of space overlooking the sea. There is also potential for a railway station there. The shops along with warehouses and the swimming pool occupy prime land suitable for apartments with sea views and access to work, shops and transport.

Within the town of Bexhill on Sea and the immediate outskirts there are vacant properties in poor repair and in other areas run down industrial areas - these could

be converted to residential and provide new homes where people are connected to the town services.
BX9 – Land south of Terminus Road. This should include the Police Station site. The building is completely under-utilised. A small office could suffice if even that is required. There is probably space for 30-40 flats on the site.
Can the area on Beeching Rd next to the Police station be developed? It's currently hidden by fir trees.
The golf course adjacent to Cooden Beach railway station. The provision of a new railway line to Bexhill's sprawling housing developments is not viable; the potential relocation of a "brownfield" golf course (whose attendees do not travel by rail) to enable a sustainable housing development has simply been ignored.
HELAA site BEX0206 (Land at Gotham Farm – west, Sandhurst Lane. The site has been rejected through the HELAA but we consider the Council's concerns can be addressed and the site is capable of coming forward in the Plan period. In terms of landscape, the site is not covered by any statutory or non-statutory landscape designation, and it is not considered an area of strong rural character due to the presence of Kloofs Caravan Park and the adjacent consented development. Overall, it is considered that the site and local context has the ability to absorb change in the form of a suitably well-designed residential development. In terms of highways, initial work has been undertaken to understand how the site could be accessed. It is proposed that the site could be accessed through the adjacent approved scheme with the upgrade of the internal roads to serve this site. The proposed arrangement could facilitate a slight realignment of Sandhurst Lane within the site frontage to improve visibility whilst not changing the character of the road itself. The site would also benefit from the adjacent scheme proposed community/retail facilities. Based on initial assessment and local knowledge, the site is appropriately connected to the existing transport network and is capable of accommodating development without giving rise to significant transport constraint (Land promoter).
Land north of BX36, Watermill Lane. This site is promoted for a primary school, as an alternative to providing a primary school on site BX39 (both sites are under the same control). Concerns are raised regarding the suitability BX39, given its location on the western edge of the Growth Area. This alternative site, immediately north of BX36, benefits from shared access and pedestrian infrastructure. A submitted Educational Technical Note confirms sufficient existing capacity to accommodate early housing delivery, meaning a new school is not immediately required and will depend on phasing and funding. This 2.2-hectare site is well contained, accessible from Watermill Lane, allows flexible delivery before or after adjacent housing, and is available, viable and free from known constraints within the plan period. It comprises agricultural pastureland with established woodland and hedgerows providing strong containment. The gently rising topography allows built form to the south, visually integrated with the Growth Area, while the northern section could accommodate playing fields and sports pitches. Access could be taken from Watermill Lane via the southwest corner of BX36, avoiding the need for road widening and allowing flexible delivery before or after adjacent housing. Parking and drop-off could be accommodated within the site (land promoter).
HELAA site BEX0213 – land south of Barnhorn Road. This site fronts the road and is one of the few options available for future residential development which is

deliverable for new development and does not erode the strong green strategic gap between Bexhill and Hastings. The land is not subject to any heritage designations and although located just outside of the defined settlement boundary, the land is subject to no landscape designations (Land promoter).
Land south-east of site allocation BX35 - We note that draft allocation BX35 omits phase 3 of the development site, included within the outline planning permission. We believe that this is likely due to the inclusion of notional buildings within the Westcott Leach planning application on this plot, which may have led to confusion occurring over the scope of development already permitted. As this phase is not continuous with the BX35 allocation we believe that it would be sensible to allocate it as a separate site. We would regard it as appropriate to consider development of this site which will be very well visually contained once planting matures at a density of 40% in line with our comments on density across the district (Land promoter).
HELAA site BEX0228 – Land north of Bexhill Enterprise Park North. The HELAA appears to have dismissed the site without considering that uses proposed upon the site were intended to be complementary to the countryside park, including parking and visitor provision. It also in our view significantly overstates the sites constraints and attributes unsubstantiated levels of potential harm as resulting from any development on this site. We believe considering the need for facilities such as parking identified under draft policy BX47, and shortfalls in provision of other commercial space or facilities to access the countryside park from Bexhill, development of such facilities alongside complimentary uses to support viability on this site would be sensible. As the site is visually contained nature of the site from the remainder of the strategic gap and countryside park, but benefits from direct access to bridleways that run through the Countryside Park it is well located for such uses. The site is also fully serviced and positioned along strategic infrastructures making at one of several sites across the district that could be considered suitable for sustainable development if sites within the strategic gap are considered for allocation (Land promoter).

How the main issues have been considered

- The HELAA will be updated for publication at Regulation 19 stage
- Site boundary for Land at Levetts Wood and Oaktree Farm (Policy BX33, was BX35) extended to include “missing” part of the site.

Question 19

Do you have any comments on proposed Policy BX1: Bexhill Urban Area?

Number of respondents: 10 / Number of comments: 13

Main issues raised

For development to be sustainable, Southern Water believes that it must always deliver sustainable drainage. This will be particularly important in areas where higher housing densities are proposed.

Communities need planning policy to go further as climate change now demands we re-think and re-design communities. More resilient and efficient homes are essential – conserving both energy and water. However, we also need to ensure that housing

design/delivery will not mean that rainwater continues to run off surfaces so fast that it causes flooding and storm discharges into rivers and seas. By controlling the rate and volume of surface water entering the combined sewer network, sustainable urban drainage systems (SuDS) can improve existing flood risk and water quality. We need planning policy to encourage proactive, cross-sector collaboration, as well as requiring all development to adhere to the principles of integrated water management in line with the National Standards for Sustainable Drainage (June 2025). The complexities and challenges of drainage need a collaborative approach between the responsible organisations, such as Local Authorities, Southern Water, the Environment Agency and community groups to adapt the urban environment to be more resilient to our changing weather patterns. Together, we need to separate rainwater from wastewater (Southern Water).

We welcome the embedding of Natural England's Green Infrastructure Framework (GIF) within Policy BX1. However, we recommend the strengthening of the wording, by clarifying the meaning of 'Where appropriate...' in the context of this policy and by requiring the use of the Urban Greening Factor (and incorporation of '...measures Page 2 of 3 to support...and biodiversity enhancements'). To this end, we suggest the use of 'must' rather than 'should', in paragraph four of the policy text. We recognise the existing urban nature of this policy's geographical area but this increases the likely need to provide green infrastructure within new developments (NPPF 20 d), 96 c) and 125 a) (Natural England).

The requirement for biodiversity enhancements, including through the use of an Urban Greening Factor (UGF) is welcomed. Details of the UGF policy should be provided. This may prove particularly useful in urban areas where the de minimis BNG exemption may apply, to ensure that biodiversity is retained within urban areas, helping to address the twin objectives of Living Well Locally and Green to the Core, as well as helping to deliver Local Nature Recovery Strategy (LNRS) priorities. We would advocate the requirement for biodiverse green and/or brown roofs and green walls wherever possible, as well as the use of native and/or nature friendly planting within landscaping. Enhancements to the public realm should have regard to the LNRS, particular with regards to priorities and measures for woodland, hedgerows and scrub, urban nature, urban treescapes and aquifers (East Sussex County Council – Ecology).

There are inconsistencies in the way the draft document treats the matter of Sustainable Drainage design and local flood risk. This inconsistency can be partially explained by the presence of strategic policies (such as BX1, BX18 and BX29) which set out SuDS requirements for several sites, but the issue needs to be addressed (East Sussex County Council – Flooding).

We support the inclusion of policy criteria that address heritage considerations. Increased development density within Bexhill Town Centre should avoid or minimise harm to the historic environment. We suggest the following wording is amended to better align with national policy:

*"Proposals that intensify existing development to increase densities will generally be supported, provided they demonstrate high-quality design, **the significance of** ~~have a satisfactory relationship with~~ any heritage assets (whether designated or non-designated) is **preserved or enhanced** and ~~do not compromise~~ residential amenity **is not compromised.**"*

The policy also appears to suggest that the HER1 only applies within the Bexhill Town Centre Conservation Area rather than in any case where heritage assets might be affected. There are a number of listed buildings within the Bexhill Urban Area and an adjacent conservation area. We suggest the wording is amended to make this clearer (Historic England).
The draft policy is generally positive with the aim of encouraging denser forms of development within Bexhill which is well placed to accommodate new growth. We also welcome the flexibility regarding car parking and transport as it is in line with the approach encouraged by the NPPF, and on the basis that the town centre is well served by public transport, shops, services and employment opportunities (Southern Housing).
Unsuitable old houses in the town centre should be demolished.
The proposals will adversely affect the town, too many houses are being planned with no infrastructure to back it up.
Much more investment in the Central Urban area is needed, to improve basic infrastructure. Lack of parking in town centre. Traffic calming and speed enforcement is needed.
The area south of railway line that includes the Egerton Park, the beach and the tennis courts etc is our tourist and leisure area and includes houses that the Earl De La Warr himself commissioned and had built that surround the park and it should not be designated 'Urban area' when it would be ruined by the very high density housing planned for the 'urban area'. People will need the restful peace and beauty of the leisure/tourist area as respite from the high-density housing they are crammed into. Gardens should not be built on.

How the main issues have been considered

- Southern Water comments are addressed through Policies ENV3 and ENV4.
- Wording updated to address Natural England's comments
- Reference to the "Urban Nature" Priorities and Core Measures in the East Sussex and Brighton and Hove Local Nature Recovery Strategy added to supporting text, to address ESCC Ecology's comments
- Wording updated to address Historic England's comments.

Question 20

Do you have any comments on proposed Policy BX2: Bexhill Cultural Area?

Number of respondents: 6/ Number of comments: 6

Main issues raised

We welcome Policy BX2 as it aligns with other complimentary transport and cultural infrastructure investment made and supports sustaining and developing a cultural area in the town around the Grade I Listed De La Warr Pavilion. This includes improvements to the quality of the public realm to complement the arts, culture and tourism offer (East Sussex County Council – Culture and Tourism).

We support this policy, the emphasis on reinstating historic features and the recognition of heritage assets such as the De La Warr to the cultural offer in Bexhill (Historic England).
Bexhill Museum supports Policy BX2 and welcomes its designation of a Bexhill Cultural Area, but we ask that the museum's position at the west end of the seafront cultural route is treated strategically — not just descriptively. The protection clause for cultural uses should apply to community and volunteer-led venues, not only commercial operators. As the Pavilion's neighbour and ally, the museum holds the town's own story. It reminds us that a diverse cultural ecosystem is stronger than a single anchor. We support the encouragement of visitor accommodation, which directly benefits smaller cultural venues. Also, looking ahead, Policy BX2 also provides a planning foundation for Bexhill's 2028 Town of Culture ambitions. Finally we put five broader asks on record: make Council support visible; clarify relationships through better-structured agreements; protect community benefit during devolution; recognise independent culture as infrastructure; and build heritage into wellbeing and resilience thinking.
The 20 mile-per-hour (mph) area should be extended.
The statement "The arts and cultural offer in Bexhill is centred around the De La Warr Pavilion" is incorrect. The area would be better described as “the Heritage Quarter”, which also houses the colonnade and near-by Museum. Furthermore, the London Road area houses many artists and cultural organisations, it's where the local and wider community go, the area's approach is inclusive and visitors enjoy discovering it. It's also the Town Hall Square, the most underserved Town Hall Square in the UK. Makes far more sense to me to have this area as the cultural quarter, it maps out the town effectively and creates more areas for people to visit.
Why do you not include as tourism the Egerton Park, the children’s playground, the tennis courts area, sports field or the beach, when you have mentioned the sailing club and the rowing club? Do you plan to build on the park?

How the main issues have been considered

- Reference to Egerton Park added to the supporting text, however the plan not extended to include the park because this could cause confusion, given that the policy is supportive of new visitor accommodation.

Question 21
Do you have any comments on proposed Policy BX3: London Road – Sackville Road Enhancement Area?
Number of respondents: 4/ Number of comments: 4
Main issues raised
We support this policy. Sackville Road is a located within the Bexhill Town Centre Conservation Area and also forms part of the setting of the Grade 1 Listed De La Warr Pavillion. As such, we would welcome integration of heritage considerations into any future improvement scheme, such as: v. Improvements preserve or enhance the character and appearance of Bexhill Town Centre Conservation Area and the setting of the Grade 1 De La Warr Pavillion (Historic England).

Hard to see what plans are. However please do not remove the road which flows nicely around the town hall square! Do not pedestrianise this. Traffic will be horrendous without it.
This crucial gateway needs prioritised investment to showcase the culture and community spirit of Bexhill for people coming into our town.
We welcome an improvement to attract more businesses, only if there is no loss of parking.

How the main issues have been considered

- Reference to Conservation Area added to supporting text to address Historic England's comments

Question 22 Do you have any comments on proposed Policy BX4: Beeching Road Enhancement Area?
Number of respondents: 8 / Number of comments: 9
Main issues raised
Network Rail believe the proposed site allocation should make a reasonable contribution towards improvements at the station. This should be in terms of accessibility and supporting active travel through providing sufficient cycle storage capacity at the station. This aligns with the proposed active travel improvements within the draft Policy and ensures a connected link from site to station (Network Rail).
We support this policy. The supporting text outlines the opportunity to enhance the setting of the Grade II listed Bexhill West Station and its role as a gateway to the wider enhancement area. This could be given greater weight by being included in the policy text. This could be done, for example, by including text such as: “(vi) Take opportunities to enhance the significance of the Grade II listed Bexhill West Station” (Historic England).
Car parking should not be removed.
Relocation of existing businesses would be very expensive.
Scout hut should not have to be relocated, this would take time and may not be a convenient place for users.
Within all specified areas in Central Bexhill there needs to be serious consideration to traffic calming & enforcement. Mention of cycling & walking and this needs to be properly policed as it is NOT currently safe to walk or cycle in Bexhill town.
Private and commercial road traffic is a major problem currently in the Beeching Road area and it lacks sensible parking facilities. Free parking should be provided in a designated area. All the time there is a charge to park vehicles will park elsewhere in the local area.
London Road is ignored by decision makers. London Road is the most exciting area of Bexhill and has far more artists, creative organisations than any other part of Bexhill and is the heart of the community.

London Road has high levels of pollution and far too many cars, this has been exacerbated by the new mini-roundabout which has increased idling. This is concerning as there are two children's nurseries on the road.
Beeching Road should be retained for light industrial/commercial/ services area, providing employment - not residential. It is unsuitable for a hotel as not an attractive area.
Support tidying up the London Road area as it looks a mess and as one of the routes into Bexhill it should look pleasant and welcoming.

How the main issues have been considered

- Additional criterion (6) added to address Historic England's comments
- Additional supporting text added to refer to links to the railway station, to address Network Rail's comments

Question 23

Do you have any comments on proposed Policy BX18 – West Bexhill Growth Area Infrastructure Policy

Number of respondents: 16 / Number of comments: 16

Main issues raised

Given the quantum of new homes proposed in the West Bexhill Growth Area, ESCC welcomes the inclusion in policy BX18 and, more specifically, BX27 (Beeches Farm and land north of Barnhorn Road), of a new primary school with early years nursery provision to serve the West Bexhill area (East Sussex County Council – Education).

It is especially important that this growth area considers the Green to the Core objective as well as Live Well Locally. Allocations in this area are in close proximity to Areas of Particular Importance for Biodiversity (APIB) (as defined in the Local Nature Recovery Strategy) (Pevensy Levels SSSI, SAC, Ramsar and ancient woodland). Large portions included in Areas that Could Become of Importance for Biodiversity (ACIB) with measures mapped for rivers, streams and aquifers, woodland, wetlands and standing waterbodies, urban nature and nature networks. Public open spaces should be positioned carefully to ensure no recreational impacts on APIB features (East Sussex County Council – Ecology).

WDC welcomes continued joint working on assessing the impacts of significant growth within the West and North Bexhill area, as any long-term solution could involve development of a new transport corridor on land within both Rother and Wealden District and could provide strategic transport interventions that would enhance development opportunities in our respective planning areas. This could also help reduce the level of unmet housing need within Rother. Given the scale and location of the emerging site proposals, WDC considers that early and ongoing cross-boundary engagement is critical in ensuring that any development brought forward near the administrative boundary of Wealden District is planned, justified, and deliverable, and does not result in unacceptable impacts on Wealden's infrastructure or Communities (Wealden District Council)

Strongly support the designation of West of Bexhill as a Growth Area and the inclusion of a dedicated infrastructure policy. However, Policy BX18 requires greater clarity and nuance to ensure it is effective and deliverable. Infrastructure responsibilities should not be applied generically across all sites; instead, requirements must be evidence-based, site-specific and compliant with CIL Regulation 122. Coordination should be achieved through the Infrastructure Delivery Plan and Infrastructure Funding Statements rather than mandatory Growth Area-wide masterplanning or design coding that could delay delivery. Wastewater upgrades for long-allocated sites such as Northeye are the statutory responsibility of providers and should not impede housing delivery (Homes England).
It is critical that adequate green space and sports provision is provided for the community and that this is of a good quality. One issue to take into account when assessing the provision to be made for outdoor sports pitches with reference to the current playing pitch strategy which identifies a deficit in provision is that the increasingly wet winters are reducing the scope for football to be played on grass pitches throughout the winter and early spring. Consideration should perhaps therefore be given to the feasibility and benefit of providing all weather surfaces where there is scope for such provision to be managed by the community/club/management organisation etc (RDC Sports Development Officer).
The biggest issue is the road network, which is considerably under strain already. A major new northern bypass, to remove through-traffic from the area is a minimum requirement, as is considerable development of routes out of the area towards Eastbourne in the West and Battle/Tunbridge and South East London to the North. Public transport that is not affected by congestion will also be critical for such massive development to work.
It is critical that most of the improvements outlined in the policy are achieved before any new house building commences.
Previous planning permissions have failed to provide promised infrastructure (e.g. Rosewood Park). Developers should be held to account and required to make the improvements.
There may be new medical facilities included in the plan - will there be enough medical staff to service them?
We welcome the approach of RDC to have a broader strategic growth area policy which sets the infrastructure expectations of the area in general and then considers the site-specific contributions to this. Walking distance to a primary school is only one factor for consideration, topography is also a factor. The list of commercial uses is too prescriptive and contrary to the NPPF, the policy should reference Class E uses more broadly. The requirement for a GP surgery also fails the soundness tests and should be made more flexible, i.e. to require a contribution, as the provision of a surgery will ultimately be a consideration as part of a wider assessment as to how health needs are provided in the wider health planning area.
The policy should be applied consistently against all site allocations in the growth area (BX19-28) including smaller sites, as all will benefit from the improved infrastructure provision. Currently it is not listed in the policy criteria for all those sites.

How the main issues have been considered

- References to Local Plan's other overall priorities added to criterion 1
- Reference to measures and priorities in Local Nature Recovery Strategy added
- Reference to impacts on infrastructure in adjoining authorities added to supporting text
- Reference to all weather sports pitches added to criterion 3 (vi)
- Additional clarity provided in terms of which sites the policy applies to
- The potential for a West Bexhill bypass has been explored with ESCC and National Highways, but those organisations has confirmed it is not in their plans and there is no reasonable prospect of its delivery through the Plan period
- Shared infrastructure list amended to remove uses already required in individual site allocation policies.

Question 24

Do you have any comments on proposed Policy BX29 – North Bexhill Growth Area Infrastructure Policy

Number of respondents: 10/ Number of comments: 12

Main issues raised

In view of the volume of new homes proposed in the North Bexhill Growth Area, ESCC supports the inclusion of a new primary school with early years nursery provision in policy BX29 and, more specifically, either BX37 (Land north of Haven Brook Avenue (west)) or BX39 (Land west of Ninfield Road) (East Sussex County Council – Education).

Draft policy BX29 considers a wide, area for strategic growth, which has been considered since 2006. Of relevance to the Minerals Planning Authority (MPA) is proposed allocation BX39 (Land West of Ninfield Road, Bexhill). The southern area of this allocation lies within an Minerals and Waste Consultation Areas (MCA and WCA) for Ashdown Brickworks. Policy BX29 should be strengthened to include reference to maintaining the effective function of the safeguarded operations at Ashdown Brickworks. We also expect reference to consultation taking place with the MPA regarding development and masterplanning of the proposed allocation under BX39 (East Sussex County Council – Waste and Minerals).

It is especially important that this growth area considers the Green to the Core objective as well as Live Well Locally. There are Areas of Particular Importance for Biodiversity (APIB) (as defined in the Local Nature Recovery Strategy) within this area, comprising multiple blocks of ancient woodland. Allocations BX45-49 are close to Combe Haven SSSI, ancient woodland and LWS. Large portions are included in Areas that Could Become of Importance for Biodiversity (ACIB) with measures mapped for woodland, rivers, streams and aquifers and urban nature and nature networks. Public open spaces should be positioned carefully to ensure no recreational impacts on APIB features. A master-planning approach is welcomed (East Sussex County Council – Ecology).

Consideration should be given as to how best to connect the Growth Area with the public transport and the railway. The draft site allocations within the Growth Area

should consider how they can contribute, individually and cumulatively, to improving access to the railway (Network Rail).
It is critical that adequate green space and sports provision is provided for the community and that this is of a good quality. One issue to take into account when assessing the provision to be made for outdoor sports pitches with reference to the current playing pitch strategy which identifies a deficit in provision is that the increasingly wet winters are reducing the scope for football to be played on grass pitches throughout the winter and early spring. Consideration should perhaps therefore be given to the feasibility and benefit of providing all weather surfaces where there is scope for such provision to be managed by the community/club/management organisation etc (RDC Sports Development Officer).
Many roads in this area are narrow, with no pavements, making them unsuitable for increases in traffic. The bus services seem satisfactory, although many people choose to travel by car of course. How confident are you that suitable and sufficient parking facilities will be provided in each of the developments; it's simply foolhardy to think people will merely travel by public transport when we're all welded to the convenience of car ownership.
Criterion (iii): We accept that there will likely be a need for a new Primary School with Early Years Nursery provision to service the North Bexhill area. The land to the north of BX36 is considered an appropriate and deliverable candidate for the Primary School (landowner).
Criterion (vi): Any health and social infrastructure contributions must meet the NPPG tests which will need to be determined on a site-by-site basis.
Criterion (viii): This policy should be revised to make specific reference to the quantum of sports provision required in the North Bexhill area to provide clarity for applicants, to aid with masterplanning and to inform discussions regarding proportionate monetary contributions for offsite provision (as required). Alternatively this policy should confirm that delivery should align with the provision identified in the site-specific policies. It is noted for example that BX31 (Kiteye Farm) sets a requirement for 2.64 hectares of open spaces, including outdoor sports provision. The physical characteristics of each site will determine whether it is possible for sports facilities to be accommodated.
Criterion (xi): We are supportive of this principle in so far as it relates to the implications of the North Bexhill allocation itself. It is noted that the IDP Schedule identifies waste water treatment infrastructure improvements under reference UTI008 but the cost of these improvements is currently known.
We believe that there should be a policy and decision-making recognition that significant contributions to infrastructure have already been made by the Enterprise park (BX35, BX47, BX48, and BX49), in the form of roads, cycleways, water, electrical and sewerage and drainage infrastructure (Sea Change Sussex).

How the main issues have been considered

- References to Local Plan's other overall priorities added to criterion 1
- Reference to measures and priorities in Local Nature Recovery Strategy added

- Reference to impacts on infrastructure in adjoining authorities added to supporting text
- Reference to links with Bexhill railway station added to criterion 3 (ii)
- Reference to all weather sports pitches added to criterion 3 (vi)
- Additional clarity provided in terms of which sites the policy applies to
- Shared infrastructure list amended to remove uses already required in individual site allocation policies

Question 25 - Do you have any comments on proposed Policy BX30 – Land south of Haven Brook Avenue – Infrastructure

There were no significant issues raised under this question that have not been covered under other questions.

Southern Rother and Hastings Fringes

Question 26
Do you have any comments on the proposed site allocations in Crowhurst Parish, detailed in Policies CR1 to CR3?
Number of respondents: 15 / Number of comments: 16
Main issues raised
No reference to parking in any of the policies (ESCC Transport and Highways).
Additional wording required to encourage early engagement with Southern Water (Southern Water).
There are inconsistencies when referring to requiring Sustainable Drainage as it should apply to all developments (Pevensey & Cuckmere WLMB).
Lack of infrastructure in the village.
New development will impact the character and feel of the village.
Development of greenfield sites will impact on the environment and landscape.
Affordable housing percentages should be the higher of Rother Policy HOU2 or the NP policy.
Additional site-specific comments
CR1
Building heights on extension to the allocation should not exceed existing single storey (High Weald NL Unit).
An indicative layout map will be needed to explain areas of open space and retained and enhanced landscaping, along with building heights parameters (High Weald NL Unit).
Increase in density is acceptable but not increasing the site area too as NP strived to allocate small sites.
The Site is available, achievable and deliverable for housing development in line with the draft allocation wording.
CR2

An indicative layout map will be needed to explain areas of open space and retained and enhanced landscaping to ensure increased quantum can be accommodated (High Weald NL Unit).
Policy wording required to reference the nearby (within 500m) Battle wastewater treatment works (Southern Water).
Increased quantum of development inappropriate due to environmental and landscape sensitivities.
Lack of parking on existing roads will be exacerbated with new development.
Development will impact 1066 footpath.
Increased quantum of development undermines the Neighbourhood Plan process.
Development will overlook existing properties to the north as no existing boundary vegetation exists (contrary to the policy wording).
The green infrastructure should be located along the northern boundary to buffer against the existing properties.
CR3
Craig Close is privately owned and therefore access cannot come from it.
Development should not overlook existing properties.

How the main issues have been considered

- Landscape Sensitivity Study prepared to assess site specific impacts on the HWNL
- Further parts of the Crowhurst Neighbourhood Plan incorporated into the Local Plan policies to more strongly reflect the visions for the sites
- Infrastructure Delivery Plan updated to identify infrastructure required to support planned growth
- Reference made to the Local Nature Recovery Strategy

Question 27

Do you have any comments on the proposed site allocation in Fairlight Cove, detailed in Policy FA1?

Number of respondents: 10 / Number of comments: 11

Main issues raised

See site specific comments.

Additional site-specific comments

FA1

The site is liable to varying forms of flooding and partly within Flood Zone 3. It fails the sequential test for flood risk.

The wastewater system is incapable of coping with more development and discharge could pollute the watercourses in the area.

Southern Water have a duty under the Water Industry Act to provide additional capacity when it is required and therefore criterion 9 should be strengthened to ensure there is sufficient capacity.

Development will cause harm to the HWNL and character of the village.

There is a lack of infrastructure in Fairlight and the roads do not have capacity for more development.
The Coastal Change Management Area shows there are issues on ground stability and hydrology in the village which additional development could further impact.
The development will not provide housing for those who need it and there are already many properties for sale in the area.
Development should not be on agricultural land.
Visibility from the proposed access will be dangerous due to the bend in the road.
The access road crosses a highway drainage SUDS network.
The site is subject to a live planning application which is supported by a suite of technical assessments which demonstrates the deliverability of the site.
The developer objects to a 50% requirement for age-restricted housing as this is not justified or viable to deliver.
The developer objects to a financial contribution towards a doctor's surgery as this is not evidenced or consistent with national policy tests for developer contributions.

How the main issues have been considered

- Infrastructure Delivery Plan updated to identify infrastructure required to support planned growth
- Strategic Flood Risk Assessment prepared to assess flood risk issues on sites
- Policy requirements revised to ensure they are justified

Question 28
Do you have any comments on the proposed site allocations in the Hastings Fringes (Guestling Parish), detailed in Policies GU1 and GU2?
Number of respondents: 21 / Number of comments: 25
Main issues raised
Water supply and drains already breaking under weight of vehicles.
Development should remain in Hastings BC.
Ivyhouse Lane industrial estate needs to be blocked to through traffic and only accessible from The Ridge.
Support development if 25% is social housing.
20 mph speed limit should be imposed, improved footpath provision and resurfacing with proper drainage.
Additional site-specific comments
GU1
As we have already consulted on all existing allocated sites (in adding to offering LPA free consultations at planning application stage) we comment in this response on new/changed site allocation policies, where the site has not previously been allocated and planning applications have not yet been submitted (Southern Water).
The council welcomes criterion i which requires a comprehensive scheme to be developed in conjunction with ES7. The development criteria should be reviewed such that they align with ES7, such as adding an additional criterion to require a

lighting plan to minimise light spill into the National Landscape (Hastings Borough Council).
The road is already busy due to the industrial estate and the lorries that serve it. The Ridge does not have capacity for more traffic.
The continued allocation for employment development at GU1 is supported. The site adjoins an Area of Search for potential waste development identified by the East Sussex, South Downs and Brighton & Hove Waste and Minerals Sites Plan (2017). This is compatible with any potential future waste use that may come forward in this area (ESCC Waste & Minerals).
The site is in close proximity to APIB (ancient woodland) and is surrounded by deciduous woodland habitat of principal importance (HPI). Substantial buffers should be provided to all woodland boundaries, with particular consideration given to reducing the impacts of predation by domestic pets (ESCC Ecology).
GU2
Southern Water has identified no potential capacity constraints for site GU2 at this Local Plan stage. Southern Water request additional wording regarding the use of our early engagement pre-planning service (Southern Water).
We cannot comment further on the suitability of this site, and impacts on the HWNL, without the benefit of Landscape Sensity Studies, which would need to include considering topography here and views from Winchelsea Lane, prior to allocation (High Weald NL Unit).
The council welcomes the policy wording, in particular criterion iii which requires a comprehensive scheme to be developed in conjunction with the adjoining land in Hastings, namely site HS21 Land East of Rock Lane and HS13 Land North-West of Winchelsea Lane adjoining that (Hastings Borough Council).
Rock Lane is too narrow to support more development. Traffic levels will be dangerous. Entrance to the site is not safe. Traffic speeds are too fast. Road is in too poor a condition. It is dangerous for pedestrians to walk down it.
The site, including the entrance, regularly floods. The topology and slope from Rye Road exacerbates this risk. There is a main drain beside No 7 Winchelsea Lane, directly to the side of the field.
The site is greenfield agricultural land in the High Weald National Landscape and development would have an adverse impact. Development would be visible from the wider landscape. The land is meant to be a buffer between urban and rural.
Development will impact wildlife and protected species.
Lack of infrastructure to support development (e.g. doctors, dentists, schools, water capacity, public transport).
There are plenty of brownfield sites to use.
There is an old rubbish dump on the land, an old brickworks and railway architecture.
Cumulatively the RDC and Hastings proposals build circa 90 houses on land that currently houses one single dwelling.
The site proposes ribbon development which is banned under your own policy.
No Dark Skies assessment has taken place.
The cumulative impact of this site and other in Hastings BC which total 92 dwellings is too much.

Landowners of privately owned drive at Winchelsea Lane will not give permission for a footpath/cycle connection.

Development would be inconsistent with the draft 2025 NPPF due to climate change, flooding, drainage, ground instability and harm to NL.

How the main issues have been considered

- Landscape Sensitivity Study prepared to assess site specific impacts on the HWNL
- Housing and Economic Development Needs Assessment updated to inform employment floorspace need and site development density
- Reference made to the Local Nature Recovery Strategy
- Strategic Flood Risk Assessment prepared to assess flood risk issues on all sites
- Infrastructure Delivery Plan updated to identify infrastructure required to support planned growth

Question 29

Do you have any comments on proposed Policy GU3: Rock Lane Urban Fringe Management Area?

Number of respondents: 2 / Number of comments: 2

Main issues raised

The council welcomes the proposed allocation of area GU3 as a buffer policy, protecting the openness of this urban fringe area and green infrastructure at the borough edge. The council also welcomes acknowledgement that the quality of this area could be improved (Hastings Borough Council).

This policy is strongly supported and aligns with the draft LNRS, with APIB (ancient woodland) and mapped measures for woodland, rivers, streams and aquifers, and nature networks on the ACIB (ESCC Ecology).

How the main issues have been considered

- Reference made to the Local Nature Recovery Strategy to ensure the required legal duties are met

Question 30

Do you have any comments on the proposed site allocations in Guestling Green, detailed in Policies GU4 and GU5?

Number of respondents: 23 / Number of comments: 26

Main issues raised

Southern Water has identified no potential capacity constraints for site GU4 and GU5 at this Local Plan stage. Southern Water request additional wording regarding the use of our early engagement pre-planning service (Southern Water).

For sites located near to the SRN, it will be particularly important that they are supported by an appropriate Transport Assessment at the planning application stage and are advised to seek early engagement with us at the pre-application stage (National Highways).
Chapel Lane is a busy road and the highways impacts (e.g. traffic, new accesses, accidents, pedestrian safety/lack of footpath) from 28 new dwellings would be dangerous, particularly at school drop off and pick up.
The local infrastructure cannot cope with more development (e.g. primary and secondary schools, roads, wastewater, public transport, medical facilities) and is also limited in provision meaning future residents would be reliant on private cars, increasing noise and air pollution.
Construction traffic and subsequent additional resident traffic would impact the listed buildings nearby.
Development would harm the landscape, visual, ecological and heritage values of the High Weald NL and suburbanise the settlement. The sites should be considered major development in the NL for their scale in comparison to the settlement.
A 2021 survey identified no local need for new housing. It identified 11 households with a local connection in need of affordable housing. The proposed affordable housing on the sites would serve a district need, not the local need.
Developing both sites would lead to cumulative harm and exacerbate the impacts.
Rother can meet its housing targets in less protected areas.
The sites are in communities classified by Rother's own Settlement Sustainability Study of 2024 as having low sustainability; as such, they cannot amount to sustainable developments, and nor can they be evidenced as sound.
The sites border ancient woodland.
Additional site-specific comments
GU4 - Wild Meadows, Chapel Lane, Guestling Green
We cannot comment further on the suitability of this site, and impacts on the HWNL, without the benefit of Landscape Sensitivity Studies, which would need to include considering topography here and views from the north, prior to allocation (High Weald NL Unit).
The site has flooding issues and is historically a water logged field and run off will occur onto Chapel Lane. Development will exacerbate the impacts.
The site borders a working farm and therefore development would generate noise and pollution impacting the farm.
The site is elevated above Chapel Lane and therefore development would have a significant visual impact on the High Weald NL.
The site has previously been refused permission and was dismissed at appeal.
The landowner confirms the site is suitable, available and achievable for a residential-led development. We consider the site can accommodate more development; in any instance the capacity should be "minimum of". Access has been accepted at the previous appeal. There are services, chiefly the primary school, within close proximity to the site. The previous livery use generated a similar level of trips than the proposed quantum of development would. There are no site-specific constraints (apart from the High Weald NL) that would impact upon the suitability or deliverability of the site.

GU5 – Former Highways Depot, Guestling Green
Southern Water infrastructure crosses site GU5 and may require easements or diversion. Southern Water request additional wording regarding the layout of future development and maintaining access to sewerage infrastructure (Southern Water).
No objection in principle subject to the other general site-specific comments on our reps letter being addressed (High Weald NL Unit).

How the main issues have been considered

- Infrastructure Delivery Plan updated to identify infrastructure required to support planned growth
- Landscape Sensitivity Study prepared to assess site specific impacts on the HWNL, particularly for site GU4
- Additional wording incorporated on highways matters given the proximity to the Strategic Road Network
- Strategic Flood Risk Assessment prepared to assess flood risk issues on all sites
- Additional wording added relating to Southern Water infrastructure

Question 31
Do you have any comments on the proposed site allocation in Three Oaks, detailed in Policy GU6?
Number of respondents: 34 / Number of comments: 37
Main issues raised
See site specific issues.
Additional site-specific comments
GU6 - Field at Halfhouse, Butchers Lane, Three Oaks
Southern Water has identified no constraints for site GU6 at this Local Plan stage. Southern Water request additional wording regarding the use of our early engagement pre-planning service (Southern Water).
Though a relatively small allocation, development of this site would be highly intrusive into the HWNL landscape on the presently undeveloped side of the road, and would result in the encroachment with built form into open undeveloped fieldscape which presently contributes positively to the landscape character of the HWNL. As such, we consider the allocation of the site for development would not conserve and enhance the HWNL (HWNL Unit).
This area floods on a frequent basis, particularly in the winter. The clay soils makes soakaways ineffective.
It is in the High Weald National Landscape. The existing housing on Butchers Lane will be overlooked and lose the views out into the countryside as the site sits higher than the existing properties. This land performs an important landscape function as the rural setting and approach to the village. It would result in the loss of historic field patterns. It would domesticate and urbanise the rural edge and harm the tranquillity of the village.
The 1066 footpath runs through it and many people use it daily. The Right of Way should be maintained and not altered.

Building on this site would have a detrimental impact on wildlife and ecology. There is a protected ancient oak tree in the field, Ancient Woodland, Priority Habitats and ponds adjacent to the site. Consideration should be given to lighting, surface water management and adequate buffers.
Butchers Lane is not suitable for any increase in traffic. It is used as a rat run. It is severely damaged with potholes. It is not wide enough for footways to safely access the railway station (with an infrequent hourly service), pub and village hall. The speed limit should be reduced to 20mph. Traffic counts, safety assessments, visibility splay analysis and traffic calming should be investigated. Access should not be sought from the north of the site.
The adjacent entrance to the site is private and has no right of way for construction of new site. I will never give permission to use my entrance for this proposal. Therefore, access will require the removal of hedgerows which have been there for years.
The village is not sustainable and infrastructure cannot cope with any more housing. There is no primary school. The nearest GPs are in Westfield and Hastings. The water supply is not reliable and suffers from low water pressure, particularly in the summer and tourists. The sewerage system was designed to cope with existing demand only so how will new dwellings connect. There are no local shops. Future residents would be car dependant. There is no crossing point on the A259 to access the bus stops on the other side of the road.
Three Oaks station should have provision for parking and a drop off area.
The Old Grain Store (brownfield site) should be developed.
The style of dwellings should be in keeping with dwellings opposite.
New development will not bring meaningful employment opportunities as the countryside does not have the job infrastructure.
Support development which would enable the village to prosper and permit young people to live in the area.
Development would impact the nearby Grade II listed Half House Farm House.
Negative effects on Health and Housing as indicated by the SA Assessment.

How the main issues have been considered

- Infrastructure Delivery Plan updated to identify infrastructure required to support planned growth
- Landscape Sensitivity Study prepared to assess site specific impacts on the HWNL
- Strategic Flood Risk Assessment prepared to assess flood risk issues on all sites
- Reference made to the Local Nature Recovery Strategy

Question 32

Do you have any comments on the proposed site allocations in Icklesham, detailed in Policies IK1 and IK2?

Number of respondents: 32 / Number of comments: 34

Main issues raised

Southern Water has identified no potential capacity constraints for these sites at this Local Plan stage. Southern Water request additional wording regarding the use of our early engagement pre-planning service (Southern Water).
The sites are in the High Weald NL. No landscape sensitivity assessments have been undertaken.
There is a lack of infrastructure in the village to cope with the proposed development (no village shop, post office, oversubscribed school, poor bus service, limited child-age activities/recreation, no sewerage capacity, no GP or dentist, lack of water and regular hose pipe bans,).
Building a local reservoir would be more beneficial to all that live in Rother.
Where will the proposed drainage go?
Development would impact on the ecology and wildlife on the greenfield sites including protected species.
The policies do not demonstrate that 10% Biodiversity Net Gain is achievable.
Development would be detrimental to village life, social cohesion, identity and way of life.
Both sites lie outside the current defined development boundary and therefore developing these sites will lead to encroachment into the countryside and further extending ribbon development.
The scales of development would likely require internal street lighting which would impact Dark Skies.
The density of dwellings suggested is unsuitable and not in keeping with anywhere else in the village.
There are very limited employment opportunities in the local area.
Brownfield sites should be prioritised for development as well as bringing vacant buildings back into use.
Additional site-specific comments
IK1 - Land adjacent to Little Sherwood Industry Park
Southern Water infrastructure crosses site IK1 and may require easements or diversion. Southern Water request additional wording regarding the layout of future development and maintaining access to sewerage infrastructure (Southern Water).
We consider this major development in the High Weald NL. It would be highly intrusive into the undeveloped southern side of the road and visibly prominent to the south. The HELAA LSA broadly acknowledges this. There are two historic Public Rights of Way in the site (High Weald NL Unit).
There is considerable noise from Icklesham Joinery. Sound proofing would be needed.
A new access would be dangerous as traffic is fast on this section. There is no footway on the southern side of the A259. A crossing and road calming measures would be required and the speed limit reduced.
Understand there is a church covenant on the site and no building was permitted.
There is a Public Right of Way through the site.
Water services for the existing houses on the south of the road run under this site.
Development would set a precedent for building on the south side of the road which has long been resisted by planning. Development in the west of the village will also decentralise the village centre.

Development would overlook nearby properties and would sit above the hedgerow causing a loss of privacy.
The field becomes saturated and muddy in winter months which suggests a high groundwater level. It is one of the wettest fields in the village.
The site is currently used for informal recreation by dog walkers and play space for children. This side of the village lacks any other open amenity.
The landowner/developer confirms the site is available, deliverable and developable in 1-5 year period. The landscape assessment submitted in the call for sites demonstrates its lower sensitivity. The site should have a higher density of development.
The site acts as a biodiversity corridor between Guestling Woods and across to Broad Street and the Brede Valley.
Site ICK0002 scores similarly on the Sustainability Appraisal and should be considered too and it is closer to the village centre.
IK2 - Land adjacent to Orchard Close
Development would be intrusive into the High Weald NL extending deeper than the exception site and be uncharacteristic. Exception sites should not in themselves set a precedent for further adjacent development (High Weald NL Unit).
An access from Orchard Close is preferable but this is a private road and will require 3 rd party consent. This is a National Highways matter (ESCC Highways).
The ACIB includes mapped measures for woodland, hedgerow and scrub within/adjacent to the site, recognising the presence of traditional orchard priority habitat on site (ESCC Ecology).
Sites seeking a new access onto the SRN must demonstrate evidence of highways policy compliance. If the existing access is utilised, it must be assessed on the intensification and impact on safety (National Highways).
Access via Orchard Close is not feasible due to legal access rights, existing soakaways, overflow pipe and pedestrian safety for the existing residents.
The southern part of the site is subject to surface water flooding and therefore allocating the site for development fails the sequential and exception tests.
Orchard Close was a rural exception site and should not be used to justify further development.
Bat boxes were installed on the houses at Orchard Close and new development would generate harmful noise levels and impact flight paths.
Previous S106 agreements for Orchard Close were not upheld and therefore there is little faith new ones will be.
It will be highly visible on the ridge from across the valley and harm the views of the countryside.
There have been refused applications and appeal decisions on Broad Street regarding the potential harm to the High Weald NL.
Development is just an addition of what is already there and should be granted.
The allocation is justified and timely to address historic unmet need. The site is developable early in the plan period. The site represents an appropriate and necessary contribution toward meeting Icklesham's housing needs within the wider context of the District's housing challenges. The part of the site within Chartwell's control can deliver all 32 dwellings.

How the main issues have been considered

- Infrastructure Delivery Plan updated to identify infrastructure required to support planned growth
- Landscape Sensitivity Study prepared to assess site specific impacts on the HWNL
- Reference made to the Local Nature Recovery Strategy
- Strategic Flood Risk Assessment prepared to assess flood risk issues on all sites
- Additional wording incorporated on highways matters given the adjacency to the Strategic Road Network
- Additional wording added for both sites relating to drainage infrastructure
- Site IK1 (Land adjacent to Little Sherwood Industry Park) updated to include noise pollution mitigation measures

Question 33

Do you have any comments on the proposed site allocations in the Hastings Fringes (Westfield Parish), detailed in Policies WS1 and WS2?

Number of respondents: 7 / Number of comments: 9

Main issues raised

All major development applications (including brown field sites) should be supported by a desk-based heritage impact assessment, including Historic Environment Record (HER) data (ESCC Archaeology).

For all proposed allocated sites, and particularly those in suburban and rural areas, scheme design should be informed by Ecological Impact Assessments (EclA) and Ecological Constraints and Opportunities Plans (ECOPs) to ensure that appropriate mitigation (ESCC Ecology).

These sites should be considered in Westfield parish's housing figures.

There is not enough infrastructure, including in Westfield village, to support the developments.

Additional site-specific comments

WS1- Land at Michael Tyler Furniture, Woodlands Way

This scale of development in this location should be considered major development under NPPF 190, and therefore there would be a presumption against it. We cannot comment further on the suitability of this site, and impacts on the HWNL, without the benefit of Landscape Sensitivity Studies (High Weald NL Unit).

Criterion iv required access from Woodlands Way which is within Hastings borough. Welcomed criteria on retaining trees. It is not clear if this site would join with the adjoining Rother WS2 and Hastings HS23 (Hastings Borough Council).

Should a future industrial user for the site be found the adopted policy should allow that alternative.

WS2 - Land east of Beaney's Lane

*This scale of development in this location should be considered major development under NPPF 190, and therefore there would be a presumption against it. **We cannot***

comment further on the suitability of this site, and impacts on the HWNL, without the benefit of Landscape Sensitivity Studies. <i>We note that the HELAA LSA set out that ‘There may be some scope for small scale development if this can conserve and enhance the AONB and create new or protect existing habitats’ and the LSS will need to explore this potential, for example the proposed quantum of 70 dwellings may not be appropriate, prior to allocation</i> (High Weald NL Unit).
The policy to restrict development to the southern third of the site is supported (ESCC Ecology).
About 0.4ha of the cross boundary site is within Hastings borough. Criterion xiii on land stability is welcomed. Additional criteria required on a comprehensive scheme with the land in Hastings, reference HS23 (Hastings Borough Council).
There are going to be cumulative traffic impacts with proposed development in the Hastings Local Plan on an already busy road in The Ridge.
The promoter confirms the site is deliverable. The site could accommodate a higher quantum of development by revising the policy to allow for development further into the northern parts of the site which are visually contained and mitigation for the Ancient Woodland and SSSI can be achieved. Criterion ii should be amended to allow for development across the whole site. Criterion iii should be revised to not include requiring enhancements where impact is inevitable. Criterion v should refer to access from the south of the site, not east. Criteria x and xi should allow for more flexibility for removal where required. Criteria xii-xiii support with technical evidence to come at application stage.

How the main issues have been considered

- Infrastructure Delivery Plan updated to identify infrastructure required to support planned growth
- HEELA updated to take account of latest information on sites that are suitable, available, and achievable. Site WS1 – Michael Tyler Furniture Factory is no longer available.
- Landscape Sensitivity Study prepared to assess site specific impacts on the HWNL

Question 34

Do you have any comments on the proposed site allocations in Westfield, detailed in WS3 to WS5? In your response, please state which site your comment relates to.

Number of respondents: 22 / Number of comments: 27

Main issues raised

Need to improve the condition of lanes around the village including Stonestile Lane, Moat Lane, Rock Lane to support any increase in traffic, as well as construction traffic, currently these lanes are dangerous.

Lack of infrastructure in the village, the roads are congested and the school and GP over-subscribed.

Insufficient parking in the village.

The level of development proposed for Westfield is excessive and will fundamentally change its character. Construction will cause years of disruption.
Does the sewage treatment works have the capacity to manage the additional requirements of these properties?
Inadequate public transport meaning new residents will have to drive which is unsustainable.
Objection to development of greenfield land, only brownfield land should be used.
Additional site-specific comments
WS3 – Land at Moor Farm, Westfield
Southern Water’s initial checks indicate that site WS3 may have limited local network capacity, and phasing of development may therefore be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated in each policy. Please include the following wording: “Occupation of development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider”. Also, Southern Water infrastructure crosses site WS3 and may require easements or diversion. Please also include the following wording: “Layout of the development must be planned to ensure future access to existing sewerage infrastructure for maintenance and upsizing purposes” (Southern Water).
The policy requirements should include the need to provide bus service contributions, upgrade of bus stops and safe and suitable access to reach closest bus stops on the A28 (East Sussex County Council – Transport and Highways).
This scale of development in this location should be considered major development under NPPF 190, and therefore there would be a presumption against it. A small part of this site, at its northern edge, is allocated in the DaSA for 10 dwellings (WES3). We cannot comment further on the suitability of this site, and impacts on the HWNL, without the benefit of Landscape Sensitivity Studies. We note that the HELAA LSA set out that: ‘The open character and long views do increase sensitivity even though the character of the site is not particularly distinctive. There could be an opportunity for a small scale development in the northern part of the site with a new defensible village edge and a well-defined landscape buffer on the boundary with the countryside.’ This potential will need to be considered in the LSS prior to allocation (High Weald National Landscape Unit).
There are several areas where the wording could be strengthened. The site should be landscape and active travel vision led, prioritising pedestrian and cycle movements across the site, making safe connections into existing footways and facilitating use of public transport. The requirement for a “a new hedge on the southern boundary” is unlikely to be sufficient. The development should avoid the loss of existing mature trees. It is agreed that vehicular access must be from Westfield Lane to avoid additional vehicle movements through the centre of the village. The inclusion of green infrastructure is consistent with community priorities. The location provides opportunities to ensure connected Green Infrastructure corridors around the perimeter of the site. The village play area is highly likely to be used by residents of the new development. The current WS3 wording does not appear to include explicit reference to a drainage strategy or sustainable drainage systems (Westfield Parish Council).

The draft policy text for WS3 incorrectly identifies the land next to Stonestile Lane (south-east of Goulds Drive) as biodiversity net gain potential when it is brownfield land (formerly 1 and 2 Moor View Cottages and associated large greenhouses), thereby making it suitable for development as per NPPF guidelines – by making use of the pre-existing utility connections at this site. The site should be extended slightly to the east and south. The eastern edge should be approximately determined by the line of the sewer network manholes as this would facilitate sewer maintenance if a road was built along this man-made boundary (Landowner).
WS3 has potential to capitalise on the land strip which is surplus to the County Council's requirements between Church Lane and Moor Lane to establish a segregated active travel corridor, with biodiversity net gain capacity. Green infrastructure should be focused to the east of the WS3 site, not to the south as outlined by the policy text, to benefit from the natural relief of the land and promote sustainable drainage practices. An eastern green infrastructure corridor would also contribute to Note 11 of the policy text (Landowner).
Developing the proposed site allocation presents an opportunity to create a roundabout junction to replace the current 90-degree bend between Westfield Lane and Church Lane (Landowner).
The location of the proposed access road joining the A28 is on a particularly lethal corner, the development will significantly increase the risk to life. The corner has been the location of many accidents including, in February 2023 when a car crashed into the adjacent house at high speed partially demolishing a section of it.
This part of the A28 is particularly susceptible to flooding.
Development would be harmful to biodiversity, resulting in the loss of semi-natural habitat and fragmentation of wildlife corridors and harm to protected species.
Need for safe pedestrian/cycle links and public-transport integration, current pedestrian and cycle access is unsafe.
WS4 – Land on east side of Cottage Lane, Westfield
The Parish Council disagrees with the inclusion of the site. Nevertheless, it has reviewed the proposed policy wording. The policy requires the inclusion of “appropriate pedestrian infrastructure...” the wording does not provide clarity for ensuring that residents will be able to walk, from the development site into the village centre. The S106 agreement requires an upgrading of footpath and the inclusion of a safe crossing point across the A28 to access the bus stops. This must be reflected in the policy wording. The footway on the A28 on the southbound carriageway between the crossing point, bus stop and village surgery entrance will also require widening. There are unresolved issues around surface water management. There should be a specific policy clause to require the submission of an appropriately designed surface water drainage system.
The site should not be considered at this stage due to an unresolved re-forestation notice served on the site.
Unsafe access via Cottage Lane.
Area is prone to flooding.
WS5 – Freshfields Farm, Westfield Lane, Westfield
The policy requirements should include the need to provide bus service contributions, upgrade of bus stops and safe and suitable access to reach closest bus stops on the A28 (East Sussex County Council – Transport and Highways).

No objection in principle subject to the other general site-specific comments on our reps letter being addressed (High Weald National Landscape Unit).
The Parish Council does not object to this allocation on the basis that WS5 may provide an opportunity to support local employment growth. The policy wording should be stronger in terms of responding to the setting of the site and needing to ensure a landscape led design. Clearer design parameters would help ensure development integrates into the landscape. Additional controls and considerations should be included to ensure the development respects the sensitivity of the National Landscape. Strengthening the policy wording in these areas would help ensure that the site allocation responds more fully to the concerns expressed by the community when responding to the Settlement Spatial Plan work and better protect the character of Westfield and its setting within the High Weald National Landscape. The policy could also be strengthened by requiring a detailed Transport Assessment.
We agree with the proposed allocation for expanding the employment floorspace on site, however we suggest that the allocation is increased to allow for a larger scale provision to meet longer term requirements. Adjoining land to the west and south is available. The allocation confirms that a number of upgrades will need to be required to deliver the employment space, including highway and pedestrian access upgrades within the site and significant landscaping works. Given the values currently available for employment space, a larger floor area may be required to be able to make the delivery of high quality units, alongside significant site upgrades, financially viable. A larger scale allocation also allows for longer term planning for the site to ensure the council can still demonstrate adequate employment space even if some other draft allocations or unimplemented planning consents fall away. Additionally, the draft policy should be amended to include retail (use class E(a)) in the allocated uses together with use classes E(g) and B8. Given there is some retail on site and a range of employment uses have been proposed at Freshfields Farm, adding retail as an optional use within the allocation would provide more flexibility within the allocation and would allow the site to evolve and respond as needs and demands in the district changes. The substantial existing access off the A28 and the geographical proximity to Hastings makes this site a logical location for logistics and warehousing and it is therefore proposed that the allocation is extended to include a larger element of floorspace to accommodate this growing demand (Landowner).

How the main issues have been considered

- Infrastructure Delivery Plan updated to identify infrastructure required to support planned growth
- Housing and Economic Development Needs Assessment updated to inform employment floorspace need and site development density
- Landscape Sensitivity Study prepared to assess site specific impacts on the HWNL

- Strategic Flood Risk Assessment prepared to assess flood risk issues on all sites
- Additional criteria added to strengthen public transport requirements and continued engagement with ESCC Highways on highways matters, particularly site WS3 (Land at Moor Farm)
- Additional wording added relating to Southern Water infrastructure and phasing

Question 35

Do you consider that there are any other possible sites in the Southern Rother and Hastings Fringes sub-area (which includes the parishes of Crowhurst, Fairlight, Guestling, Pett, Westfield and Icklesham (west)) which should be allocated for development in the Local Plan?

Number of respondents: 5 / Number of comments: 7

Main issues raised

Why has Former Moorhurst Care Home (HELAA WES0002) been removed as a proposed allocation? Whilst it may have permission for a care home could the land still not be developed with assisted living options and allow flexibility in what comes forward if the permission is not implemented (Westfield Parish Council and others).

HELAA WES0042 is suitable for a very limited scale landscape-led development (Westfield Parish Council).

The following sites conflict with multiple community priorities: WES0022, WES0023, WES0024, WES0036, WES0037, WES0039, WES0041, WES0043, WES0044 (Westfield Parish Council).

HELAA WES0039 immediately joins the settlement boundary and a small scale housing development can be delivered and not impact on landscape, heritage, Ancient Woodland, flood risk or protected habitats. The landowner also owns WES0035 and WES0053. The land considered most suitable for immediate development is WES0039 and half of WES0053.

Troyd Farm (HELAA WES0043) is available. It is an enclosed site with limited landscape quality. Development would sit directly behind the existing houses and be a natural rounding off of Moat Lane. The site can access Westfield village in about 15 minutes via public footpaths and can therefore access the services within it.

HELAA ICK0002 adjoins the built up boundary of Icklesham. The site is in a single ownership and is available immediately. There is a bus stop adjacent to the site. The main part of the site is currently low-grade agricultural land. The footpath in the site would be incorporated into any development. There would be minimal impact on the wider landscape as it sits in the backdrop of the village. The southern half of the site would become accessible green space.

How the main issues have been considered

- HEELA updated to take account of latest information on sites that are suitable, available, and achievable

Battle and surrounding settlements

Question 36

Do you have any comments on the proposed site allocations in Battle, detailed in Policies BT1 to BT11?

Number of respondents: 338 / Number of comments: 379

Main issues raised

ESCC (Education) Primary - Battle and Langton CE Primary School is full to capacity. In most intake years the school admits significant numbers of children from out of area. In future years, the school admissions system will prioritise in-area applicants from the new housing over out of area children to help reduce pressures from the children arising from new housing on intake numbers. A bigger challenge is that of primary age children who move into the new homes requiring a place in other year groups that are already full. Therefore, it is possible that additional capacity (permanent or temporary) might be needed within the area to cope with the demand generated by the new housing. Additional early years nursery provision is also likely to be required in Battle to serve the planned new homes.

Network Rail - Battle station is proposed to benefit from AFA which will deliver step free access between both platforms. Given this scheme will enable those with mobility issues and other means of being encumbered to sue the station should open opportunities for better connections with existing and future housing sites. We would welcome the Council's consideration on how the AFA scheme at Battle station could support this. Reference should be made to supporting proposed improvements at Battle station within the Vision.

Southern Water - Initial checks indicate that sites BT1, BT2, BT7, BT9, BT10 and BT11 may have limited local network capacity, and phasing of development may therefore be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated in each policy. For these sites, and any we've previously requested phasing wording (unless the detailed planning consultation responses we've provided indicate otherwise) please include the following wording:

Occupation of development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider.

Object to the amount of development proposed in Battle, which far exceeds the amount proposed in any other in Rother and is disproportionate.

Need to preserve strategic gap between Battle and Hastings.

Additional site-specific comments (if relevant)

BT1 – Land south of Hastings Road, Battle

ESCC (Transport and Highways) - Include the need to provide bus service contributions, upgrade of bus stops and safe and suitable access to reach closest bus stops on Hastings Road.

Network Rail - The proximity of the site to Battle railway station means a contribution should be sought to ensure delivery of the AFA scheme at the station to support growth.

HWNL – Object to any development in western parcel as it’s a BAP priority habitat and an identified Wildflower Meadow. Eastern parcel may be appropriate, subject to LSS.
Battle Town Council (BTC) – Object. A very large development contributing to an urban environment rather than the rural aspect of Battle. Concern with egress from the site particularly considering the Blackfriars development opposite Hastings Road, in conjunction with the pollution coming from increased vehicle traffic from these developments. The two parcels of BT1 must have a pedestrian link between them, and the active travel route for Battle, laid out in the LCWIP, must be completed.
CPRE - While up to half of this site might be justifiable (noting that a small part of it is allocated in the existing Neighbourhood Plan), such a large site already on the edge of Battle starts to look unsustainable the further east it progresses.
Traffic congestion is already bad on Hastings Road, this development will make it worse and unsafe, and the access from Hastings Road will be unsafe.
Unacceptable environmental and landscape impact on the HWNL and other statutory designations, including significant flood risk.
Lack of infrastructure (GP, dentist, school) including active travel provision.
BT2 – Land at Breadsell, Battle
ESCC (Ecology) – Virtually the whole site is mapped on the ASIB for woodland, hedgerows and scrub and nature networks. Delivery of these measures should be prioritised within any scheme development. The programme of monitoring for SSSI is welcomed.
ESCC (Transport and Highways) - Include provision of a suitable link to the Public Right of Way (PRoW), which is referenced: Crowhurst 21a. There may be opportunities for cycle links onto the A2100. The road does not have any suitable designation for cyclists.
BTC – Object. The site comprises a clear strategic gap between Battle and Hastings. If considered, native screening using trees should be set between the site and A2100, lower housing density and appropriate shape to match existing development would help match the lower density housing to the north and west.
Traffic congestion is already bad in Battle, this development will make it worse and unsafe, plus public transport links are poor to this site.
Unacceptable environmental and landscape impact on the HWNL and other statutory designations, including flood risk issues.
Lack of infrastructure (GP, dentist, school).
BT3 – Beech Farm, Battle
BTC – Support. No objection in principle, but consideration should be given to sustainable modes of transport to the site, including making the southern access road a permissive path.
Traffic congestion is already bad in Battle, this development will make it worse and unsafe.
Unacceptable environmental and landscape impact on the HWNL and other statutory designations.
Lack of infrastructure (GP, dentist, school).
BT4 – Land at Caldbec House, Caldbec Hill

BTC – Support. No objection, the Battle Neighbourhood Plan allocated 5 dwellings for this site, 3 have been developed to date.
Traffic congestion is already bad in Battle, this development will make it worse and unsafe.
Unacceptable environmental and landscape impact on the HWNL and other statutory designations.
Lack of infrastructure (GP, dentist, school).
All other Battle sites will be adding traffic to the high street, this development will not as Virgins Lane and Whatlington Road are suitable alternatives.
BT5 – Rutherfords Business Park, Battle
BTC – Support.
BT6 – Land north of Sunny Rise, Battle
ESCC (Transport and Highways) - There will likely be a request for bus service contributions for each of these.
HWNL – Highlight concern about the quantum of development proposed in order to suitably protect the Ancient Woodland bounding the site.
BTC – Object. Site was previously assessed in BNP and excluded due to access dispute.
Traffic congestion is already bad in Battle, this development will make it worse and unsafe especially on North Trade Road.
Unacceptable environmental and landscape impact on the HWNL and other statutory designations.
Lack of infrastructure (GP, dentist, school).
BT7 – Land at Almonry Farm, Battle
ESCC (Transport and Highways) - There will likely be a request for bus service contributions for each of these.
Historic England - This site is located close to the Registered Battlefield boundary. Reference should be made to preserving the setting of the Battlefield within the policy text itself. The requirement for an HIA is supported and could be included in the policy to provide additional weight. The HIA should assess the contribution which this allocation makes to the setting of the Registered Battlefield and what impact the loss of this open area and its subsequent development might have upon its significance.
HWNL - The site displays a number of the identified character components of the HWNL's natural beauty set out in the Management Plan; it is identified as part of a medieval field system (assart fields AD 1066 – AD 1499), each field within bound by historic field boundaries (hedgerows) and is bound to the east by designated Ancient Woodland (ASNW). Development on this site would adversely impact on these character components.
BTC – Object. This site was assessed within the BNP and was dismissed as unsuitable. The parameters remain unchanged. The land is unsuitable from an access point of view and has historical limitations as it is close to the battlefield. There is also Ancient Woodland requiring protection. Issues with the nearby development whereby residents park cars on verges, blocking pathways, as there are not enough spaces provided within the development. Desire to improve active travel routes in and around this location.

CPRE - This is an extremely environmentally sensitive site, with Ancient Woodland on the boundary, flood risks, and high biodiversity value. Development here would rely on a single access to North Trade Road, beyond safe traffic management.
Traffic congestion is already bad in Battle, this development will make it worse and unsafe, including unsafe access through Tollgates.
Unacceptable environmental and landscape impact on the HWNL and other statutory designations, including Manser Shaw gill impact zone, and visual impact from the PRow to the north.
Lack of infrastructure (GP, dentist, school).
Is in close proximity to heritage assets including Battle Conservation Area and Registered Battlefield, development here would harm these assets.
BT8 – Land adjacent to 1 Loose Farm Cottages, Battle
HWNL – Object as it would undermine the existing settlement pattern; it would infill the present gap between the Hasting Rd buildings, and the historic farmstead of Loose Farm (converted) – a gap which is important to the legibility and landscape setting of the historic farmstead.
BTC – Support. From the proposal it is unclear where the new access onto the A2100 would be situated as at that point the road is on a bend. Subject to this being confirmed as a safe access there is no objection.
Traffic congestion is already bad on Hastings Road, this development will make it worse and unsafe, plus the existing lane is unadopted.
Unacceptable environmental and landscape impact on the HWNL and other statutory designations.
Lack of infrastructure (GP, dentist, school).
Site is not in a sustainable location being a 50min round trip to the nearest convenience store.
BT8 aligns well with the NP and fits within the preference for restrained scale development.
BT9 – Land east of Coronation Gardens, Battle
ESCC (Transport and Highways) - There will likely be a request for bus service contributions. There should also be reference made to the need to review the highway in terms of vehicle speeds and potential extension of the speed limit to support the extension of the built up area.
Southern Water - The proposed boundary to this site is within 500m of Battle wastewater treatment works and we therefore request the additional wording – <i>The layout of development for any site allocation with 500m of an operational wastewater treatment works should be informed by an odour assessment to be undertaken in consultation with statutory wastewater operator for the works.</i>
HWNL - The site is identified as part of a medieval field system (assart fields AD 1066 – AD 1499), a key character component of the HWNL's natural beauty set out in the Management Plan.
BTC – Object. As this is in the only permitted Green Gap within Battle, this should be retained with no further development. If considered, then pedestrian access must be incorporated to connect with Coronation Gardens, aswell as a footway along Marley Lane to serve the development and appropriate lowering of speeds to 30mph.

Unacceptable environmental and landscape impact on the HWNL and other statutory designations.
Unacceptable environmental and landscape impact on the HWNL and other statutory designations.
Lack of infrastructure (GP, dentist, school).
The site comprises a logical extension to the settlement and is in relatively close proximity to the train station.
BT10 – Land adjoining Little Brans, Battle
ESCC (Transport and Highways) - Hastings Road is 40mph and an HGV route and not suited to regular cycling. There will likely be a request for bus service contributions, and bus infrastructure, along with access improvements to reach them.
HWNL – Object as development of this site would be inconsistent with the morphology of the town of Battle and its pattern of growth. The site displays a number of the identified character components of the HWNL’s natural beauty set out in the Management Plan; it is identified as part of a medieval field system (assart fields AD 1066 – AD 1499), and is bound to the south by designated Ancient Woodland (ASNW). Development on this site would adversely impact on these character components.
BTC – Object. Considered overdevelopment in a historic field, bounded by Ancient Woodland and Priority Habitat. To be considered a sustainable site, speed limits on the A2100 should be lowered for safer cycling into Battle. Alternatively, consider upgrading footways to become shared-use paths between “Bannatyne’s roundabout” and Battle Town. A preferable option would be to create a traffic-free shared-use route 'behind' the houses along Hastings Road, joining up with BT1 and hopefully one day the cross-town LCWIP shared-use route.
CPRE - Behind an existing long ribbon development. The only local service is a bus route.
Traffic congestion is already bad on Hastings Road, this development will make it worse and unsafe.
Unacceptable environmental and landscape impact on the HWNL and other statutory designations.
Lack of infrastructure (GP, dentist, school).
BT11 – Battle Market Square, Battle
Southern Water - Southern Water infrastructure crosses site BT11 and may require easements or diversion. For BT11, and any sites we’ve previously requested layout wording please also include the following wording: <i>Layout of the development must be planned to ensure future access to existing sewerage infrastructure for maintenance and upsizing purposes.</i>
HWNL - No objection to the principle of allocation. In view of its contained town centre location, we would not consider this to be major development in the HWNL. However, there is no information as to what height / form/ massing of apartment building the proposed quantum of 52 dwelling is based on. The appropriate number for allocation should stem from consideration of appropriate built form with regard to the Battle Conservation Area, not trying to retrofit a scheme to deliver the pre-determined no of dwellings.
BTC – Object. Concerns about overbearing development in terms of bulk. Future plans should address pavement parking by visitors to the area. Vehicles of all types

regularly park either partially or fully on the pavement outside the existing business fronting the High Street.
Traffic congestion is already bad in Battle, this development will make it worse and unsafe, plus loss of parking/ increased parked cars needs to be considered.
Support the idea of better utilising the space, including the provision of affordable housing,
Lack of infrastructure (GP, dentist, school).

BT1 – Land south of Hastings Road, Battle

- Landscape Sensitivity Study prepared to assess impacts on the HWNL; western parcel to be left undeveloped and wording added to ensure eastern parcel is developed with full consideration of HWNL and settlement pattern
- Included supporting text setting out that contributions to public transport is needed
- Supporting text highlights the potential need for a community building/ early years provision

BT2 – Land at Breadsell

- Text added to ensure ASIB is fully considered
- Landscape Sensitivity Study prepared to assess impacts on the HWNL, the recommendations have been carried into the policy
- Masterplan will ensure appropriate gradual densities to ease any impact of development

BT3 – Beech Farm, Battle

- Public transport access noted as a constraint in the text, with a requirement for link to public footpath

BT4 – Land at Caldbec House, Battle

- No changes made

BT5 – Rutherfords Business Park, Battle

- No changes made

BT6 – Land north of Sunny Rise, Battle

- Access has been resolved and required to go through the existing estate to the south
- Existing wording highlights the need to keep a buffer to Ancient Woodland, and supporting text added to highlight the ACIB

BT7 – Land at Almonry Farm, Battle

- Site is being removed due to landscape and heritage issues

BT8 – Land adjacent to 1 Loose Farm Cottages, Battle

- Policy wording constrains development to the north of the site and states a tree/ landscape buffer is required to the south to minimise landscape impact

BT9 – Land east of Coronation Gardens, Battle

- Wording added to ensure no encroachment on the wastewater treatment works
- Wording strengthened to ensure walking and cycling access is available for the site to come forward
- Landscape Sensitivity Study prepared to assess impacts on the HWNL, the recommendations were already referenced in the policy, but have been strengthened

BT10 – Land adjoining Little Brans, Battle

- Requirements for public transport improvements already in the policy
- Landscape Sensitivity Study prepared to assess impacts on the HWNL, the recommendations were already referenced in the policy, but have been strengthened; development to be contained to the eastern half of the site to minimise landscape impact
- Buffer to Ancient Woodland already included in the policy text
- Walking route up to BT1 considered, but would involve breaking the historic field boundary, so not taken further

BT11 – Battle Market Square, Battle

- Wording added per Southern Water request
- Wording strengthened in relation to the built form expected to come forward on the site

Question 37

Do you have any comments on the proposed site allocation in Brightling, detailed in Policy BRI1?

Number of respondents: 3 / Number of comments: 3

Main issues raised

See site specific issues.

Additional site-specific comments

BRI1 – Coldharbour Farm Estate

No external lighting should be included unless for safety purposes as in an area of Dark Skies.
The design of the buildings now is significantly different and less appropriate to the initial one approved for AONB. Housing might be better option as there is no allocation in Brightling.

How the main issues have been considered

BRI1 – Coldharbour Farm Estate

- No changes made

Question 38
Do you have any comments on the proposed site allocation in Catsfield, detailed in Policies CT1 – CT3?
Number of respondents: 35 / Number of comments: 40
Main issues raised
ESCC (Education) Primary - As noted in paragraph 6.84, a number of rural primary schools in the district are operating under-capacity. East Sussex County Council (ESCC) welcomes reference to appropriate growth in these villages as an important factor in securing the long-term viability of these schools and communities.
Catsfield has strong heritage background as a small village in a rural environment, this needs to be protected, which would not happen with the three proposed sites which are too large and propose too much development in Catsfield.
Catsfield has dark skies which need to be protected.
Lack of infrastructure (GP, dentist, school) to serve the proposed development level, in addition to the B2204 being congested and unsafe to serve these developments.
Unacceptable environmental and landscape impact on the HWNL and other statutory designations, in addition to the proposed sites all having significant flooding issues.
Additional site-specific comments
CT1 – Land west of B2204
ESCC (Transport and Highways) - There will likely be a request for bus service contributions and upgrades to bus stops.
Catsfield Parish Council (CPC) – Object. This site has had a planning application rejected, 0.8 of 1.66 Hectares for development of 30 dwellings. Access is close to a zebra crossing and junction with a poor safety record (for access to 30 dwellings in CT1 and 20 from CT2). Infrastructure insufficient with no access to sewers and a water supply not secured. Site flood regularly with run off requiring huge rainwater tanks.
CT2 – Land south of Wilton House Equestrian Centre
ESCC (Transport and Highways) - There will likely be a request for bus service contributions and upgrades to bus stops. Vehicle access provision agreed.
Southern Water - Southern Water infrastructure may cross sites CT2 and CT3 and may require easements or diversion. For these sites, and any we've previously requested layout wording please also include the following wording: <i>Layout of</i>

<i>the development must be planned to ensure future access to existing sewerage infrastructure for maintenance and upsizing purposes.</i>
HWNL - No objection in principle subject to the other general site-specific comments on our reps letter being addressed.
CPC – Object. This a new site, with no access from the highway. It requires CT1 to be built first which is 0.6 from 1.23 hectares for development of 20 dwellings. The proposed access is via narrow public right of way used by walkers, horse riders and some rural residents. This access is unsuitable for a development of 20 houses.
CT3 – Land south of Church Road
ESCC (Transport and Highways) - There will likely be a request for bus service contributions.
Southern Water - Southern Water infrastructure may cross sites CT2 and CT3 and may require easements or diversion. For these sites, and any we've previously requested layout wording please also include the following wording: <i>Layout of the development must be planned to ensure future access to existing sewerage infrastructure for maintenance and upsizing purposes.</i>
HWNL – Setting of the HWNL. We cannot comment further on the suitability of this site, and impacts on the HWNL, without the benefit of Landscape Sensity Studies, which would need to include consideration of the issues raised in the report for RR/2020/1562/P regarding the setting of the HWNL, prior to allocation. In this regard, we are unconvinced about the potential of the site to deliver the quantum of dwellings proposed in the allocation.

How the main issues have been considered

CT1 – Land west of B2204, Catsfield

- Policy wording already highlights the need for access improvements, development to be located around flood risk, and references that an increased buffer around the edge of the site is required to that of the existing allocation in the DaSa

CT2 – Land south of Wilton House Equestrian Centre, Catsfield

- Policy wording already highlights the access requirements and for development to be located away from flood risk
- Wording added per Southern Water request

CT3 – Land south of Church Road, Catsfield

- Wording added per Southern Water request
- Site is outside the HWNL but within the setting, policy wording already reflects the need for development to be located in the south-eastern part of the site (for landscape and flooding reasons), maintaining cross site views and that it should be a sensitive design for landscape consideration

Question 39

Do you have any comments on the proposed site allocation in Netherfield, detailed in Policies NE1 and NE2?

Number of respondents: 7 / Number of comments: 8

Main issues raised

ESCC (Education) **Primary** - As noted in paragraph 6.84, a number of rural primary schools in the district are operating under-capacity. East Sussex County Council (ESCC) welcomes reference to appropriate growth in these villages as an important factor in securing the long-term viability of these schools and communities.

BTC – Support both sites as approved under the BNP.

Development of 40+ dwellings will have an impact on parking and pedestrian safety, especially during school traffic peaks.

Roads to nearby main towns are in a very poor state, an increase of housing will make these roads even worse.

Broadband is poor in this location and other infrastructure in nearby Battle is lacking and over-subscribed.

Additional site-specific comments**NE1 – Swallow Barn**

ESCC (Transport and Highways) - there is likely to be a request for bus service contributions and bus stop upgrades.

Site encroaches on green spaces and only recreational space in the area.

Site is not a brownfield site as stated in the policy. It has been illegally classified as such by Rother.

Site contains historic buildings.

There are legal impediments which allow unfettered access for private sewer, which this site cannot join.

There are protected trees on site boundaries meaning the indicative developable area is incorrect, the site is too small to accommodate 10 dwellings.

NE2 - White House Poultry Farm

ESCC (Transport and Highways) - there is likely to be a request for bus service contributions and bus stop upgrades.

How the main issues have been considered

NE1 – Swallow Barn, Netherfield

- The site is part brownfield as it contains a dwelling, which is reflected in the policy

NE2 – White House Poultry Farm, Netherfield

- No changes made

Question 40

Do you have any comments on the proposed site allocations in Sedlescombe, detailed in Policies SD1 to SD11?

Number of respondents: 62 / Number of comments: 62
Main issues raised
ESCC (Education) Primary - As noted in paragraph 6.84, a number of rural primary schools in the district are operating under-capacity. East Sussex County Council (ESCC) welcomes reference to appropriate growth in these villages as an important factor in securing the long-term viability of these schools and communities.
Lack of infrastructure in the village to cope with the level of development (GP, dentist, school).
Object due to more suitable sites that should be developed first, that would make the village more integral. The two new sites spread the village out further unnecessarily.
Additional site-specific comments
SD1 – Land at Sunningdale
Drainage and flood risk on this site are particularly bad.
Transport issues as there is only one access in and out which will not handle the increased traffic volume.
SD2 – Land at Church Hill Farm
ESCC (Transport and Highways) - Access for cyclists and pedestrians indicated as via Church Hill. It is unclear which street this is referring to and we assume it is the same as Balcombe Green. Footway widening likely to be sought towards the village core.
ESCC (Culture and Tourism) - Any development should not impact access to, or the use of, the Village Hall, as per priority 1 of the ESCC Cultural Strategy 2012-2025, which looks to "create an environment where great cultural experiences are available to everyone to enhance their quality of life". This also aligns with the "Pride in Place" commitment - which seeks to continue to grow cultural opportunity and build a cultural ecosystem which gives local people opportunities to participate, collaborate and renew - in the East Sussex Cultural Prospectus due to be published in March 2026.
ESCC (Ecology) – The ACIB maps measures for enhancement of existing species-rich grassland adjacent to the site with potential for creation of species-rich grassland within the site. This should be taken into consideration in scheme design.
SD3 – Land at Sedlescombe Sawmills
ESCC (Transport and Highways) - B2244 derestricted speeds, noted as being in Neighbourhood Plan, speeds are derestricted and new development will intensify vehicle turning movement onto B2244. New access will need to be assessed in terms of safety. The site is motor vehicle reliant, no footways, no bus stops, no cycle routes other than on carriageway.
SD4 – Land at adjacent to St John the Baptist Church
SD5 – Land at Gate Cottage
ESCC (Transport and Highways) - there is insufficient highway land or land in site to provide a full width footway to connect with Eton Walk. We request a policy requirement for a crossing point to reach east side of The Street (where improvements will be required to footway width).
SD6 – Land at Church Hill Farm

SD7 – Street Farm
SD8 – Marley Lane Business Park
ESCC (Transport and Highways) - Increase of employment floorspace should ideally be supported with public transport. A travel plan cannot support vehicle dominant development in a rural area without genuine choices.
SD9 – Land at Felon’s Field
ESCC (Transport and Highways) - Increase of employment floorspace should ideally be supported with public transport. A travel plan cannot support vehicle dominant development in a rural area without genuine choices.
BTC – Support. Upgrade of the footpath leading from the A2100 / Marley Lane junction through to Sedlescombe, to a surface which is usable all year round, thus connecting the residents of Sedlescombe to the increasingly large Marley Lane industrial parks which provide employment.
Upgrade of the footpath leading from the A2100 / Marley Lane junction through to Sedlescombe, to a surface which is usable all year round, thus connecting the residents of Sedlescombe to the increasingly large Marley Lane industrial parks which provide employment.
SD10 – Land north of Gorselands
ESCC (Transport and Highways) - Bus service contributions likely to be requested for each of these.
HWNL - We cannot comment further on the suitability of this site, and impacts on the HWNL, without the benefit of Landscape Sensitivity Studies. – we note that the HELAA LSA advised that ‘Whilst most aspects of the site have a medium to high sensitivity there may be potential for a small number of houses on the site to the east of Gorselands. As this would need to be in character with the existing low-density development the number of houses would be restricted to 5 or 6.’ However, that does not appear to be what is proposed in the draft allocation.
Sedlescombe Parish Council (SPC) – It would cause unacceptable harm to the HWNL. It contradicts longstanding evidence identifying the site as unsuitable. There is no demonstrable housing need. Access and highway safety remain unresolved. Flood risk has not been properly assessed. Ownership uncertainties call deliverability into question. Environmental impacts have not been adequately addressed.
Support this site and is a logical and sensitive addition to the edge of Sedlescombe which can access village and be discreet in landscape terms.
SD11 – Land north of Brede Lane
ESCC (Transport and Highways) - Bus service contributions likely to be requested for each of these.
3.16. Southern Water - The proposed boundary to site SD11 (and as previously advised the for the existing site allocation SD7) is within 500m of Sedlescombe wastewater treatment works and we therefore request the following additional wording in these policies–

<i>The layout of development for any site allocation with 500m of an operational wastewater treatment works should be informed by an odour assessment to be undertaken in consultation with statutory wastewater operator for the works.</i>
HWNL – Object. The existing woodland to the west of the site forms a distinct eastern edge to village on northern side of road. The site is identified as part of a medieval field system (Early Post-Medieval fields AD 1500– AD 1599), and is bound to the north-east by Ancient Woodland, key character components of the HWNL’s natural beauty set out in the Management Plan. Development of this site would be highly intrusive into the HWNL landscape on the presently undeveloped side of the road, and would result in the encroachment with built form into open undeveloped fieldscape which presently contributes positively to the landscape character of the HWNL and the rural setting of the village. The existing development on the southern side of the road (East View Terrace) is not considered to set a precedent for development on northern side of Brede Lane – indeed it appears incongruous in the landscape and not something that should be exacerbated by being repeated on the northern side.
SPC - Object. There is no clearly evidenced need for housing at this scale within Sedlescombe. The site is detached from the settlement and would cause unnecessary harm to the High Weald National Landscape and is conflict on Landscape grounds with the NPPF para 189. There is no realistic prospect of achieving safe highway visibility splays, even with substantial hedgerow removal and therefore the site does not meet the deliverability test for allocating a site. The land is constrained by a Section 106 agreement and is therefore not legally available for development.
Unacceptable environmental and landscape impact on the HWNL and other statutory designations.
Visibility is poor for access due to the trees and hedges.
The local road network cannot cope with the increased traffic flow, noise and pollution.

How the main issues have been considered

SD1 – Land at Sunningdale, Sedlescombe

- Access is suitable for the level of development allocated
- Drainage and flood risk issues addressed in the policy

SD2 – Land at Church Hill Farm, Sedlescombe

- Wording added to reflect ESCC (Culture and Tourism) comments
- Wording added to ensure adjacent ACIB is considered in the scheme design

SD3 – Land at Sedlescombe Sawmills, Sedlescombe

- Wording added to ensure adjacent ACIB is considered in the scheme design

SD4 – Land adjacent to St John the Baptist Church, Sedlescombe

- Wording added to ensure adjacent ACIB is considered in the scheme design

SD5 – Land at Gate Cottage, Sedlescombe

- Wording added to reflect ESCC (Transport and Highways) comments regarding a crossing point

SD6 – Land at Church Hill Farm, Sedlescombe

- No changes made

SD7 – Street Farm, Sedlescombe

- Site being removed as development has commenced

SD8 – Marley Lane Business Park, Sedlescombe

- Public transport provision is already addressed in the policy

SD9 – Land at Felon’s Field, Sedlescombe

- Public transport provision is already addressed in the policy

SD10 – Land north of Gorselands, Sedlescombe

- On further consideration a capacity of 12 dwellings is considered acceptable as set out in the policy

SD11 – Land north of Brede Lane, Sedlescombe

- Wording added to reflect Southern Water comments on wastewater treatment works
- Landscape Sensitivity Study prepared to assess impacts on the HWNL, the recommendations have been carried into the policy, including the need for a sensitive, landscape-led design
- Wording added to ensure adjacent ACIB is considered in the scheme design
- Section 106 can be amended and there is a procedure for this

Question 41

Do you consider that there are any other possible sites in the Battle and surrounding settlements sub-area which should be allocated for development in the Local Plan?

Number of respondents: 1 / Number of comments: 1

Main issues raised

Site submission for Land of North Trade Road (HELAA BAT0092)

How the main issues have been considered

- HELAA updated to take account of latest information on sites that are suitable, available, and achievable

Rye and Eastern Settlements

Question 42
Do you have any comments on the proposed site allocations in Beckley, detailed in Policies BC1 to BC3?
Number of respondents: 50 / Number of comments: 62
Main issues raised
The sites are in the National Landscape.
Sewage infrastructure is a problem in the village.
The local area has experienced regular flooding in recent years, which already impacts road safety and access.
The total number of houses against the capacity of the local school which has 30 remaining spaces. 54 households is likely to exceed this.
I am concerned, as a citizen of Beckley about the number of houses proposed for our village. 1 are there enough places at the doctor's surgery? 2 are there places at the local schools 3 will there be enough water to supply these houses as we are short of water every year already 4 will the roads take all these extra cars, bearing in mind they are already falling apart 5 what about the flooding issues we have in the village every winter? 6 there is almost no hope of getting an NHS dentist now so how will local dentists manage that? 7 we need first time buyer housing 1 - 2 beds not 3 - 4 beds if we have to have building and council houses for people to rent
What constitutes affordable housing?
Poor quality houses will be built on a cheap budget, won't be sold and then become allocated council houses, every house around these areas will lose value.
The draft plan allocates all proposed development (BC1-BC3) to Four Oaks while excluding Beckley village. Four Oaks is already the most congested settlement in the parish, lacking services and unable to support a housing increase of around 17%, which could raise the population by up to 50% and add significant traffic and pollution.
Bus service has just been reduced and walking/cycling to Rye is downright dangerous -A268 has blind corners with no verges or pavements, summer traffic to camber can be heavy.
Beckley needs smaller dwellings, specify the dwelling size.
It's a MASSIVE amount of new homes to introduce to a small village lacking infrastructure. It will ruin this beautiful, small, quiet village.
How does Beckley need an additional 53 houses?
Why are all the proposed sites in Four Oaks and nothing actually in Beckley?

I have concerns about the total number of houses and the capacity of the local school which has 30 remaining spaces. 54 households is likely to exceed this.
Additional site-specific comments
BC1 - Land South and West of Buddens Green, Beckley Four Oaks
BC1 The site displays a number of the identified character components of the HWNL's natural beauty set out in the Management Plan; it is identified as part of a medieval field system (assart fields AD 1066 – AD 1499), and is bound on its western edge by a historic field boundary (HWAONB Unit)
BC1 We concur with the Inspectors' conclusions (APP/U1430/W/18/3197448) regarding the harms to the HWNL of development of this site and consider that the allocation of the site for development would fail to conserve or enhance the natural beauty of the HWNL. The comprehensive conclusions of the Inspector regarding the adverse impacts of development of the site on the HWNL, focussed as they were on the principle of development, mean that we consider the site should not be allocated for development in the Rother Local Plan (HWAONB Unit)
Objections to BC1 for the following planning reasons: 1. Traffic Generation & Highway Safety 2. Intensification Beyond the Dismissed Scheme 3. Impact on Character of Buddens Green 4. AONB Protection 5. Drainage and Surface Water 6. Damage the wildlife and environment
BC1 - a settlement of 6-8 dwellings, mirroring the existing houses in Buddens Green could provide the right size houses for young families, extending the site further and planning for 20 houses is excessive, especially if only 8 of them are classed as affordable.
BC1 - Unsure if the population of red kites would remain if the houses were to be built in the woods next to their homes
BC1 - Proposal is too large with too many dwellings in an AONB. It would cause significant light pollution with unshielded porch and security lights, and cause increased light trespass, impacting nocturnal animals.
Buddens Green cul de sac is not adequate to cope with the increase in traffic which will be generated.
Where will all the excess water go created by the new buildings. The water already floods across Main Street.
BC1 & BC3 – The Four Oaks end of Beckley is already hazardous due to the high volume of on-street parking. Any further increase in vehicles in this area will significantly heighten the risk of accidents. The village functions as a through route, and an increase in traffic—particularly vehicles exiting onto Main Street—would create additional safety concerns and congestion that are not sustainable.
BC2 - Land East of Hobbs Lane, Beckley Four Oaks
The proposed amount of dwellings seems to be too many for the plot considering required service vehicles across, visitor parking, risking vehicles parking at narrow points of the lane. The condition of the entrance to Hobbs Lane Russ surface is already unfit for use, and with additional vehicle traffic for this many houses will only seek to further erode non maintained surfaces.

Building houses on BC2 the old Manroy site will be a danger, as the lane is very narrow, and already is dangerous the amount of cars parked along Hobbs lane. Ebrofrost have large lorry's delivering to them, and this is going to cause chaos down an already busy lane.
Not enough gas capacity for another 20 houses.
Lorries need to exit Ebrofrost factory unobstructed by parked cars.
The proposed site in Hobbs Lane is 1/4 mile from a bus stop and therefore the need to cross the A268 which does not have crossing facilities.
The lane already can't stand the volume of traffic as it is and it's constantly in need of works due to the intensity of the potholes created by traffic.
The proposed site is a haven for wildlife and will cause unnecessary negative impacts on native species.
BC3 - Land west of Oaklea Cottages, Beckley Four Oaks
Ribbon development extending the settlement westwards inappropriately. (CPRE)
BC3 housing is being considered in an area that has Victorian drainage that causes problems at least a few times a year.
BC3 There are no amenities in the village to support this much development.
BC3 The amount of traffic that already passes through the village and is a danger to the residents it's a 30mph with residents having to park on the road. There will be an issue of parking.
BC3 - access to this site would be difficult and being greenfield development on it should be avoided
The principal objection is to site BC3, which lies outside the development boundary, harms the High Weald landscape, breaks the historic linear pattern, removes key countryside views, and represents overdevelopment likely to worsen parking and traffic problems.
I understand more housing is needed but on Main Street, I would think again.

How the main issues have been considered

General (non-site specific) comments

- Policy LAN1 and LAN2 will require development proposals to be informed by a Landscape and Visual Impact Assessment, appropriate and proportionate to the nature and scale of the development, and to conserve and seek to enhance the distinctive landscape character, ecological features, settlement pattern and scenic beauty of the HWNL.
- Infrastructure needs are addressed through the IDP, however the Local Plan must plan for growth and cannot resolve all existing problems with infrastructure which have far wider causes. Infrastructure providers have been consulted throughout the Local Plan process.
- Policy HOU1 addresses housing mix including needs for smaller dwellings.
- Affordable housing is defined through national planning policy. Policy HOU2 details the Local Plan's requirements for affordable housing.

- The sites have been identified through the HELAA process. No sites further west in the village were found to be suitable.

Policy BC1

- The appeal decision related to a specific design and layout. The allocation would limit development to the southern part of the wider field only and represents an extension to a previously allocated site and a small housing estate, located in a sustainable location within the village.
- Light pollution is addressed through Policy LAN4 (Light pollution and dark skies)
- Additional text to highlight presence of nearby listed buildings.

Policy BC2

- Concerns around traffic impact noted. The policy requires appropriate access and a new footway alongside Hobbs Lane. The Highway Authority would be consulted on a planning application.

Policy BC3

- Wording added to BC3 to identify need to plan development allow future access to sewerage infrastructure.
- Number of dwellings reduced slightly in light of small size of site and need to retain boundary trees and hedges.
- This is a small site adjacent to existing development in a sustainable location within the village. The capacity has been reduced further to ten dwellings. The landscape impact will not be significant subject to a suitable design, as will be required through the policies of the Plan including Policies LAN1 and LAN2. Development would affect a small, relatively enclosed field adjacent to existing development. It would not affect the larger gap immediately adjacent which maintains the dispersed settlement pattern.
- Additional supporting text to highlight the need to retain historic field boundaries.
- Additional text to highlight presence of nearby listed buildings and need for development to be appropriately designed to protect their setting.

Question 43

Do you have any comments on the proposed site allocations in Broad Oak, Brede, detailed in Policies BR1 to BR3?

Number of respondents: 31 / Number of comments: 51

Main issues raised

Southern Water has identified no potential capacity constraints for these sites at this Local Plan stage. For completeness, in addition to Rother consulting us on planning applications (for which we are not statutory consultees) so that we can

share the results of more checks made closer to the timeline of expected development, Southern Water request the addition of the following wording – “We encourage early engagement by developers who can make use of Southern Water’s pre-planning service here – https://www.southernwater.co.uk/building-and-developing/planning-your-development/pre-planning-enquiries/. (Southern Water)
BR2 MAJOR - This scale of development in this location should be considered major development under NPPF 190, and therefore there would be a presumption against it. The impacts of this site need to be considered cumulatively with adjacent site BR1 which is an existing DaSA allocation for 29 dwellings. The site displays a number of the key characteristics of natural beauty as defined in the HW AONB Management Plan, it is identified as part of a medieval field system (assart fields AD 1066 – AD 1499), and is bound to the north by designated Ancient Woodland (Little Austens Wood), bound by a historic PRoW. Development on this site would adversely impact on these character components. We cannot comment further on the suitability of this site, and impacts on the HWNL, without the benefit of Landscape Sensity Studies. (AONB Unit)
OBJECT: We are aware that part of the site is subject to an extant permission for 2 additional dwellings (RR/2024/625/P). This was arrived at following two dismissed appeals for greater development on the site (APP/U1430/W/22/3305548 and APP/U1430/W/22/3307541) both dismissed June 2023. We consider the approved scheme is the maximum development the site could take without adversely impacting on the HWNL; the Inspector previously advised ‘The appeal site and low-key development within it currently provide an appropriate transition between the countryside and settlement, which make a positive contribution to the character and appearance of the locality, including the AONB’. We consider that to extend development in an allocation even further west, west of the pond, would result in the encroachment with built form into open undeveloped fieldscape which presently contributes positively to the HWNL landscape character of the setting of the village of Broad Oak. (This also echoes the findings of the HELAA LSA which says for this site ‘Development here would extend the settlement westwards to the detriment of the rural character of the area and rural setting of the village.’) As such, we consider the allocation of the site for development would not conserve and enhance the HWNL, would be contrary to para 189 of the NPPF, and we consider the site should not be allocated for development in the Rother District Local Plan. (AONB Unit)
BR1/BR2/BR3 bus service contributions likely to be requested and possibly new bus stops and infrastructure. (ESCC)
Both sites represent overdevelopment that would harm the rural character and setting of the village, contrary to Policies OSS4 and EN1, resulting in an unacceptable urbanising impact.
BR1 BR2 Access arrangements are inadequate and would increase traffic on Oakhill Drive, Tillingham View, and Chitcombe Road, worsening congestion and highway safety. The cumulative impact of multiple developments has not been properly

assessed, contrary to Policy TR3 and NPPF Section 9.
The proposals are unsustainable due to insufficient infrastructure. Local schools, GP services, and community facilities lack capacity, with no secured mitigation, contrary to Policy OSS1. The local doctor's surgery has announced its closure so there will be even less support for residents.
There is a poor bus service. No towns railway etc within cycling /walking distance.
Very limited employment opportunities in the area.
Water and sewage services struggle to meet current demands at times creating issues for other residents in the village.
BR2 Loss of privacy, loss in value to property, increase poor mental health, loss of peace and tranquility. Everything we have worked most of our lives for to create a beautiful home and environment will be lost. This development will ruin our lives.
The traffic noise created from a significant increase of dwellings, negative affect on current resident's health and wellbeing, and also destroy wildlife.
Bungalows like Broad Oak Close should be included as there is a need within the parish, also three bedroomed houses are also needed as are one bedroomed flats.
The substantial developments of BR1, BR2 and BR3 will substantially change the feeling of this rural village. This is against the policy of protecting the HWNL set out in section 6.3.
Cantium Land and Development Ltd support the allocation of site BR1 (land west of the A28, Broad Oak) for 29 dwellings, confirming the site is suitable, available and deliverable, with an active outline application demonstrating realistic delivery within five years. by removing land with multiple ownership and protected trees, and access can be secured via Oakhill Drive rather than the A28. Flexibility in affordable housing provision is requested where justified by viability.
Why are less disruptive sites that are already on the main roads and main drainage are not also being considered?
Why demolish 2 perfectly good properties when other sites are available which do not directly affect other properties in such a negative way?
The problem of increased surface run-off caused by future buildings/driveways will not be solved by adding Retention Ponds. The current surface water system is outdated and not adequate. The foul drainage system that these sites would connect to, are already over-whelmed and the Water Company have to use tankers to stop overflows. Therefore, significant investment in the infrastructure of both Surface and Foul water drainage would be required before these sites could be considered viable for development.
All the proposed plans are on green sites. Current land values are based and have been purchased at a market value of arable land, if these plans are approved the sites will then be classified as building land and considerable profit will have been gained. Surely the parish of Broad Oak/Brede should suggest that some of this increase of value should be reinvested into the community. There are currently no sporting facilities as seen in the nearby village of Westfield. The Draft Plan mentions pedestrian & cycle links towards services; will a cycle path be put in by the developers?
A protection area of more than 15m should be put around the existing pond for protection of the wildlife. We would also suggest that covenants are placed on any

properties built on this site which would require these properties to maintain the pond and surrounding areas so as not to put the liability on stretched local resources.
Will heat pumps & solar panels will be fitted to any houses built? This should be stipulated on any plans approved. The heat pumps should be placed on the inner side of any housing estate as they are noisy and should not disturb the current residents and wildlife.
Fringes of the parish out of character with rural and ribbon development, not in keeping with historic pattern of the area.
Without mains drainage, there is concern that septic tanks, treatment systems, may not be sufficient for that number of properties and could lead to overflow, pollution, or failure. Inadequate drainage arrangements may affect surrounding land, gardens, nearby properties through odour, waterlogging, or contamination. Additional housing will increase hard surfaces and runoff, which may worsen local drainage problems and increase flood risk if no robust drainage strategy is in place.
There are a large cohort of young families moving in as the original old owners move on or become deceased. How will a small village school will have enough places to support these extra 119 properties?
Additional site specific comments
BR1
BR1 BR2 - The site directly adjoins ancient woodland. Development would cause indirect but significant harm through light spill, noise, recreational pressure, pet predation, and habitat fragmentation. Allocating this land for development would undermine long-standing protections for ancient woodland and conflict with national policy and the Natural Environment and Rural Communities Act 2006 duty to conserve biodiversity.
BR1 BR2 - The site supports legally protected and priority species, including bats, hazel dormice, and slow worms, with photographic and video evidence confirming their presence within the proposed allocation area. Allocating land known to support protected species conflicts with the NPPF (paras 180–181), which requires avoidance of harm to biodiversity and refusal where impacts cannot be mitigated.
BR1 BR2 - Current flood warnings have been issued for this area, demonstrating that flood risk is an active and ongoing concern. The site forms part of a natural floodplain and contributes to surface water attenuation. Allocating land for development in an area subject to flooding directly conflicts with the NPPF sequential test. Climate change projections further increase the likelihood and severity of flooding over the plan period. Development here would increase flood risk both on-site and downstream, making the allocation unsound, unsafe, and contrary to national planning policy.
BR1 BR2 - Protected species presence, adjacency to ancient woodland, and active flood risk—this site is subject to multiple, overlapping constraints that cannot be mitigated through planning conditions. Allocating such land conflicts

with the tests of soundness, particularly the requirement that a Local Plan be justified, effective, and consistent with national policy. The evidence demonstrates that this site is fundamentally unsuitable for development and should be removed from the proposed Local Plan allocation to avoid foreseeable environmental harm and legal challenge.
BR1 BR2 - The allocation fails to apply the precautionary principle despite clear evidence of environmental risk. The site supports legally protected species including bats, hazel dormice, and slow worms, and lies adjacent to ancient woodland and within an area subject to flood warnings. Where there is credible evidence of potential harm to protected habitats or species, national policy requires avoidance rather than reliance on future mitigation. Allocating land where development is likely to be constrained or prohibited by wildlife legislation is neither justified nor effective and risks rendering the allocation undeliverable. This approach conflicts with sound plan-making and exposes the Local Plan to legal challenge.
BR1 BR2 The site has been allocated without a robust or reliable evidence base. Ecological information referenced in associated assessments is inconsistent and fails to reflect year-round habitat conditions, particularly given the timing of surveys immediately following the annual grass cut. No adequate assessment has been undertaken to understand the full extent of protected species use, habitat connectivity, or hydrological function. Local Plan allocations must be informed by proportionate, accurate and up-to-date evidence. In the absence of this, allocating the site is premature & unsound
BR1 BR2 The site functions as high-value semi-natural habitat within a wider ecological network, supporting foraging, commuting and breeding species. Its allocation directly conflicts with national objectives to halt biodiversity loss, deliver Biodiversity Net Gain and strengthen Nature Recovery Networks. Development would fragment habitat, reduce ecological connectivity and degrade adjacent ancient woodland through indirect impacts. These harms cannot be meaningfully mitigated. Allocating land that already performs an important ecological function undermines both national policy and the Local Plan's own environmental objectives.
Sites BR1 and BR2 are unsound and inconsistent with national planning policy. Both sites adjoin ancient woodland, an irreplaceable habitat protected by NPPF paragraph 180(c). The Plan relies on a minimum 15m buffer without evidence that this would prevent deterioration, particularly when the cumulative impact of nearly 100 dwellings is considered, contrary to paragraphs 174 and 176. Both sites are greenfield and likely to support protected species, yet no site-specific ecological evidence is provided, despite paragraph 183 requiring such constraints

to be addressed at plan-making stage. Deliverability is also uncertain, with BR2 reliant on demolition of an existing dwelling for access and both sites dependent on off-site infrastructure, contrary to paragraphs 16, 31, and 67. As drafted, the allocations fail the soundness tests in paragraph 35 and should be removed or deferred.
BR1. Proposed Traffic management is not good. Too many vehicles using what is in effect a cul de sac, with very poor access and exit onto the A28, at present.
BR1 (29 homes) and BR2 (70 homes) will operate as one large development, funnelling hundreds of extra vehicle movements onto roads that cannot safely take them. The cumulative impact has been underestimated. Highways previously rejected access onto the A28 due to the bend and the accident-prone crossroads. The Local Plan itself confirms this remains unsafe by requiring BR1 traffic to use Oakhill Drive instead. Oakhill Drive is already too narrow and congested for existing residents, let alone a major housing allocation.
BR1 coming out on Tillingham Estate there are children and elderly there and it is not suitable for more traffic. Now you can come in via B2089 by demolishing Owls Hollow maybe there could be an in and out that would lessen the road usage.
BR1 and BR2 The natural drainage from these proposed sites discharges steeply north-westwards into Ancient Woodland. The resulting discharge by the existing springs and current run-off is causing active erosion and deep gullies in the woodland. Any future development would accentuate the current erosion and may cause land slipping.
BR2
BR2 would be an overdevelopment, 70 houses, for the village and the infrastructure is not here to cope with such a large volume of new houses. The land is also currently a working farm.
Adding BR2 to the plan only makes flooding even more likely. Checking on an OS map shows that from the western end of BR2 to the eastern end of BR1 there is a drop of over 15 metres. Will developers provide significant mechanisms to either absorb surface water in ponds or underground storage, or safely remove it from BR1 and BR2.
BR2 Village crossroads is already dangerous and will need substantial re-engineering for the additional traffic.
Broad Oak, Brede is a dark skies area, with very little light pollution. The Northern Lights can be seen. Contrary to the document, there are views to Horns Cross from BR2.
BR3
BR3 The site lies in a highly sensitive part of the High Weald National Landscape, forming a transition to open countryside, and has repeatedly been refused at application and appeal due to landscape harm. Significant constraints include ancient woodland, a pond, mature trees and the setting of a listed building. Realistic development capacity is a maximum of 6 dwellings—below the threshold for allocation—and creating access to the western area would cause further landscape impact. With BR1 and BR2 already providing around 100 homes in more suitable central village locations, BR3 is unnecessary and should be removed.

BR3 Taking the important planning constraints applying to this site and surrounding area the site can only deliver four new dwellings, below the threshold for inclusion in the local plan. The site should therefore be removed.
Approximately 1/3 of potential site BR3 is made up of my land. My land available for this development.
Broad Oak will struggle to absorb an extra 100 dwellings. BR3 in particular might be the straw that breaks the camel's back (CPRE)
BR3 plan is to allocate 20 new dwellings so therefore there should be a stipulation that approval is given on the condition that the maximum number of dwellings must not exceed the 20 limit. We request this as the developer who owns this site has history of over development and hence the many refused planning applications on this site.
The developer would be required to put a new approved path along the very busy main road in front of BR3. At present there is a ditch running in front of BR3, this ditch will obviously be removed so suitable drainage including, an oil interceptor chamber to stop pollution from the road entering the pond. Again, covenants need to be put on the houses to maintain this oil interceptor with agreement of the Environment Agency.
BR3 on the map does not show that the northern end of the gardens of Whiteacres Close are classed as agricultural as it was originally an egg farm and cannot be built on (even garden sheds).
BR3 The proposed buffer zone of 15m is only a very narrow strip and not enough to protect wildlife and should be applied to the entire perimeter (except roadway) to lessen the impact on the existing housing to the west and east side should this draft plan be approved.
BR3 There is no mention of the "The High Weald National Landscape, an Area of Outstanding Natural Beauty – Management Plan which East Sussex Council has agreed to adhere to.
BR3 This site has no mains drainage available. Therefore, any development would need to have septic tanks. There is no provision for surface water drainage. If this is just left to run into existing land ditches this could potentially cause flooding to existing properties and farmland. With the present rainfall from milder and wetter winters, these ditches are running at full capacity already. Significant investment into infrastructure is needed to overcome these issues, before the site could be considered viable for development.

How the main issues have been considered

General (non-site specific) comments

- Comments of Southern Water addressed in policies ENV1-4
- Infrastructure needs are considered through the IDP
- Transport modelling is being undertaken to support the Regulation 19 plan which considers the effect of development on the road network, including the A28. Discussions with ESCC and National Highways are ongoing

to determine necessary mitigation measures, which will be included in the IDP once finalised.

- Mixed and sustainable communities, including provision for one and two bed homes, are addressed in policy HOU1.
- The Community Infrastructure Levy allows a planning charge from development to fund infrastructure, including cycle paths, in the area where it was raised.
- Renewable and low carbon energy is addressed in policy GTC6
- Protection of biodiversity is addressed in policy EN7

BR1

- Additional policy criterion to address potential need for bus service contributions, bus stops and infrastructure
- Additional text added to the criteria enhancement of green infrastructure
- Additional text added to the supporting text to ensure due regard for the LNRS
- Additional text added to the criteria provides for the retention of a buffer zone of semi-natural habitat, at least 15m wide between the edge of development and the ancient woodland
- Additional supporting text states that development on the site will need to incorporate recommendations from the Level 2 Strategic Flood Risk Assessment

BR2

- Additional text added to the criteria provides for the retention of a buffer zone of semi-natural habitat, at least 15m wide between the edge of development and the ancient woodland
- Additional policy criterion to address potential need for bus service contributions, bus stops and infrastructure

BR3

- Additional text added to the criteria provides for the retention of a buffer zone of semi-natural habitat, at least 15m wide between the edge of development and the ancient woodland

Question 44

Do you have any comments on the proposed site allocations in Camber, detailed in Policies CM1 to CM3?

Number of respondents: 8 / Number of comments: 8

Main issues raised

The newly opened Camber Welcome Centre aligns with the tourism amenities at Camber. We would welcome consideration for any further development of this site

for visitor accommodation and tourism, considering any impact on the local community and wildlife. (ESCC)
CM1/2 - bus service contributions likely to be requested and possibly new bus stop infrastructure. (ESCC Transport and Highways)
Please note that as we have already consulted on all existing allocated sites (in adding to offering LPA free consultations at planning application stage) we comment in this response on new/changed site allocation policies, where the site has not previously been allocated and planning applications have not yet been submitted. (Southern Water)
Folkestone & Hythe District Council supports the references to the Sustainable Access and Recreation Management Strategy (SARMS) in Policies CM1 and CM2 as they are located close to the internationally important nature designations at Dungeness, Romney Marsh and Rye Bay. FHDC will continue to work with Rother DC on the SARMS as it is updated. (Folkestone and Hythe)
The areas for development in Camber are currently limited with the overflow car park and old garage site being potential areas for development. Camber Parish Council would strongly encourage the building of properties on these sites. The proposed development of housing which included affordable dwellings which was put forward by Rother District Council would be welcomed - this is not only to provide homes for local people which was part of the brief of the development but also to set the benchmark for future development in Camber in relation to issues raised by determination of flood zones (Camber Parish Council)
The progress of Camber development should be encouraged to allow the older housing to be replaced by new properties which are forward thinking in design and less reliant on wasteful sources of energy. (Camber Parish Council)
We would welcome the widening of the current building envelope to include to include land at Jurys Gap where there is room to develop with residential dwellings on land in private ownership. (Camber Parish Council)
Examination of classification of flood zones - put measures in place to minimise flooding so that rebuilding of older houses is encouraged to improve the street scene of Camber. (Camber Parish Council)
The proposal would reduce existing car parking capacity, already under significant pressure during the summer months. The consultation suggests winter overflow parking could be accommodated, the real issue in Camber occurs in peak summer periods when visitor numbers are highest. Parking frequently spills onto surrounding roads, sometimes in unsafe or obstructive ways. Camber's existing infrastructure—including parking, roads, local services and the local convenience store—already struggles to support current demand during peak periods. Additional housing allocations, including CM2 and CM3, should therefore only be considered alongside clear, deliverable plans to improve infrastructure and parking provision for both residents and visitors.
I would like to see free public parking offered. This would encourage people to visit Camber for walks. Please ensure that free parking spaces are available in the large western car park out of season.

Additional site specific comments
CM3
Residential/Holiday Accommodation and commercial development is in conflict with the ecology aims and would further impact on the SSSI and Ramsar sight * Traffic impact would increase and not as suggested decrease due to development of this sight * It is illogical to consider this area a potential for a Village centre. * The impact of the natural environment (windblown sand) is always underestimated in development plans in this area which leads to rapid dilapidation.

How the main issues have been considered

General (non site specific) comments

- Development boundaries are addressed by policy SS2
- Infrastructure needs are considered through the IDP
- Flood zones are addressed in the SFRA which forms part of the evidence base for the Local Plan

CM1 and CM2

- Additional policy criterion to address potential need for bus service contributions, bus stops and infrastructure

CM3

- The SARMS which forms part of the Local Plan evidence base addresses the impact of recreational pressure, including from new development, on sites within the Dungeness Complex.

Question 45
Do you have any comments on the proposed site allocations in Iden, detailed in Policies ID1 and ID2?
Number of respondents: 30 / Number of comments: 38
Main issues raised
Please note that as we have already consulted on all existing allocated sites (in adding to offering LPA free consultations at planning application stage) we comment in this response on new/changed site allocation policies, where the site has not previously been allocated and planning applications have not yet been submitted. Southern Water has identified no potential capacity constraints for these sites at this Local Plan stage. For completeness, in addition to Rother consulting us on planning applications (for which we are not statutory consultees) so that we can share the results of more checks made closer to the timeline of expected development, Southern Water request the addition of the following wording – “We encourage early engagement by developers who can make use of Southern Water’s pre-planning service here https://www.southernwater.co.uk/building-and-

developing/planning-your-development/pre-planning-enquiries/. Southern Water infrastructure crosses site ID2 and may require easements or diversion. For ID2, and any sites we've previously requested layout wording please also include the following wording: Layout of the development must be planned to ensure future access to existing sewerage infrastructure for maintenance and upsizing purposes. (Southern Water)
ID2 - No objection in principle subject to the other general site-specific comments on our reps letter being addressed. (High Weald Unit)
Planning policy has been to maintain the open spaces/agricultural fields and not permit ribbon development as Iden is in area of outstanding beauty. (Iden parish Council)
The Parish Council acknowledges that there is a chronic need for new affordable housing in order to bring in younger families and to help restore a balanced community. This has meant looking beyond the existing development envelope by using a brownfield site only half a mile from the village centre. This "island Development" has consistently been rejected for the reasons of employment/isolation and possibility that this would open up the adjoining fields for building. (Iden Parish Council)
ID1 Despite much opposition, including from the Parish Council, 15 new dwellings have been agreed and despite the affordability objective, the developers are now seeking this requirement to be removed. It is unacceptable for developers to plead they cannot afford to build low cost homes despite stated policy. (Iden Parish Council)
ID2 Whilst it reiterates its wish for new affordable housing in the village, the Parish Council is opposed to the usage of this Site. This field has always been regarded as an important part of the outstanding natural beauty Iden has enjoyed and for this reason, an application for just a temporary unit was rejected in 2010. (Iden Parish Council)
ID2 Over development in an area where, in close proximity there will be the agreed 15 new dwellings at Conkers (Iden Parish Council)
With the probable need to improve road access and pedestrian access with increased traffic, the entire character of this historic part of Iden will be changed. (Iden Parish Council)
The policy to squeeze as much new builds into an already full development envelope by making very limited exceptions is a short term fix when the wider aim of affordable home ownership will remain an imperative. (Iden Parish Council)
There is no evidence that they will not become second homes or holiday lets. Interestingly, since 2020, there are now 10 more airbnb's in the village and RDC is wanting to build 10 new homes (Iden Parish Council)
The village does not want street lighting which will probably be a condition if these 10 houses are built. We value our dark skies. (Iden Parish Council)
Orchards Farm, Wittersham Road Iden TN31 7XB - The village has always supported this site as ideal for a development of say 15 dwellings and small business units to replace the existing ones. Morfeys Removers use this site as a depot but also have a larger unit at Rye Harbour. We are of the view that a detailed study of this site should be undertaken as a viable alternative to Street Field and avoid the stretching of the

existing village envelope as proposed. It would also avoid ribbon development and would be away from facing the road. (Iden Parish Council)
The Parish Council's vision is that we have a community that consists of all generations with affordable housing that is being built for this purpose. Our hope that this will revitalise village life and activities. We do not want dwellings that could be let for short term purposes or homes for the retired (Iden Parish Council)
10 houses opposite east view would mean a lot more light pollution
There is no mains gas in the village
Has the proposal considered new local authority housing at affordable rents to replace former LA housing in Elmsmead and Park Wood sold into the private ownership?
Poor quality road B2082 with no pedestrian footpaths to the south of Playden lane junction and poor sight lines to cross to pedestrian footpath northwards to village centre would constitute a hazard risk.
Main Street is already in poor condition, with potholes and an inadequate surface; extra traffic from new homes and construction vehicles would worsen safety and maintenance problems.
The properties would not be 'affordable' housing and will consequently be purchased as second homes or for use as Air b and b's as is becoming common place in Iden and therefore add absolutely no benefits to the village.
Disregard of warranties relating to lack of nuisance, damage and noise within Main Street Field held by four properties that lie on the Southern border of the field.
Substantial residential development will no doubt require street lighting thus destroying the character of this Domesday village.
There is little opportunity for infill within the development boundary. Development east of the village, where extensive views may be gained across the countryside, would encroach negatively into the wider AONB landscape (Similarly) development to the south would inappropriately extend growth along Main Street, encroaching into an area of rural character.
The HELAA document IDEOO21 which preceded the current proposal stated as follows. The western part of the field [Street Field West] is assessed separately as IDE0010. While this separate section could potentially be suitable for a short terrace of small houses fronting Main Street, development into the remainder of the field would not be appropriate as this would be out of keeping with and harmful to the settlement pattern and the rural setting of the village within the countryside of the National Landscape and could harm the setting of the adjacent listed buildings. Having explained with solid reasoning why Street Field is generally unsuitable for development, the document reaches the opposite conclusion regarding the western portion of the field. Street Field West. This approach reads as disingenuous and inherently contradictory.
Visitors regularly comment on the wonderful experience of arriving at Iden from the more urbanised settlements at Playden, Rye Foreign

and Peasmarsh. They feel they have entered a rural gem where one can stop at the gate entrance to Street Field to admire the scene of grazing sheep with lambs etc. Rother District Council reflects this observation at 11.129 to 11.131 of the DaSa.
Additional Site Specific Comments
ID1
ID1 Five Grade II listed buildings lie immediately opposite or adjoining the field, meaning the site is effectively surrounded by designated heritage assets. No proportionate heritage setting assessment has been provided. Under Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, the Council must give special regard to preserving the setting of listed buildings. That duty applies at plan-making stage as well as at application stage. The NPPF requires great weight to the conservation of heritage assets. Harm to setting must be clearly and convincingly justified.
Entrance to proposed ID1 is in conflict with ID2. There is a Covenant in place to protect existing properties in Playden Lane from noise and disruption. Contrary to the detail of the published plan, these existing houses are on the southern not the eastern boundary. Correspondence from a developer confirms that: development would contravene the covenant, modification or discharge would be required, financial consideration has been offered to secure its removal. While restrictive covenants are private law matters and not determinative in planning terms, they are directly relevant to whether a site is genuinely available and deliverable within the plan period. A written statement was submitted to Iden Parish Council in 2025; the owners of the recently acquired land and the field owners have mutually binding Covenants; stating owners 'Will not....permit..... anything upon the retained land which will cause damage,nuisance or annoyance to the property or the owners.....occupiers...!'. The plot owners were recently approached by property developers. stating they could not proceed due to these Covenants.
ID1 Five Grade II listed buildings lie immediately opposite or adjoining the field, meaning the site is effectively surrounded by designated heritage assets. No proportionate heritage setting assessment has been provided. Under Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, the Council must give special regard to preserving the setting of listed buildings. That duty applies at plan-making stage as well as at application stage. The NPPF requires great weight to the conservation of heritage assets. Harm to setting must be clearly and convincingly justified.
ID2
ID2 - The allocation relies on unrealistic assumptions about retaining the western hedgerow while achieving safe access. Experience from the approved ID1 site on the same stretch of road shows Manual for Streets standards are applied locally, likely requiring significant hedge removal. Police consultation advice for ID1 also discourages tall or dense planting where visibility and natural surveillance are needed. The Plan does not demonstrate how these requirements would be reconciled with hedgerow retention. The hedge forms part of the historic field boundary.

ID2 forms part of the rural settlement edge. Development would: urbanise the Main Street frontage, erode characteristic hedged enclosure, extend built form into sensitive countryside transition.
The heritage sensitivity of ID2 is substantial and has not been properly assessed. The following Grade II listed buildings lie immediately opposite or directly adjoining the site: On Main Street (directly opposite the frontage): East View (1234895) Deacons (1234755) Danesbury (1234896) Adjoining the southern boundary (rear gardens on Playden Lane): Lamb's Orchard (1234905) Mr Catt's House (1275977) ID2 is therefore not simply “near heritage” — it is effectively surrounded by designated heritage assets.
ID2 A step in the right direction. Will increase people to support village assets. - Pub, Store, Bowl Green, Village Hall, Church.
ID2 I am all for conserving the landscape character, but with farmers finding it difficult to make a profit from farming - this field will eventually be completely full of Rabbit warrens only.
ID2 forms part of the rural settlement edge. Development would: urbanise the Main Street frontage, erode characteristic hedged enclosure, extend built form into sensitive countryside transition. The Sustainability Appraisal identifies negative or uncertain effects in landscape terms. In a nationally designated landscape, that is not a minor matter. The Council must demonstrate that allocating this site — rather than less sensitive alternatives — is justified and necessary. At present, that case has not been made.
ID2 Have brown field alternatives been considered?
ID2 This draft plan implies that there would probably be a solid row of 10 or more terraced, or otherwise linked properties, completely out of character with almost all the existing homes in the village neighbourhood.
The local authority's own Sustainability Appraisal does not identify ID2 as a strong-performing site and scores IDen “overall as having low sustainability” It does not materially enhance settlement sustainability and increases reliance on private car use. The suggested mitigations , “Improve public transport” and “seek opportunities for shops” are not measures a developer of 10 dwellings can realistically deliver. If the Council is pursuing a strategy of concentrating development in more sustainable locations, allocation of ID2 appears inconsistent with that objective. The burden is on the Council to justify why this site is preferable to more sustainable alternatives.
The current proposal ID2 is identical to that contained in the 2024 HELAA document (IDE00010) which leads me to the inevitable conclusion that Rother Planning Department has decided to proceed with this proposal regardless of the views of local objectors and without needing to address valid reasoned objections.

How the main issues have been considered

Responses to general (not site specific) comments

- Comments of Southern Water addressed in policies ENV1-4
- Light pollution and the protection of dark skies is addressed in policy LAN4
- The provision of affordable housing is addressed in policy HOU2

ID2

- Additional supporting text indicates that the historic roadside hedge must be protected.
- Additional criteria to address future access to existing sewerage infrastructure for maintenance and upsizing purposes

Question 46

Do you have any comments on the proposed site allocations in Northiam, detailed in Policies NR1 and NR2?

Number of respondents: 13 / Number of comments: 13

Main issues raised

NR2 Development here would result in an incursion into undeveloped rural field that contributes positively to character and natural beauty of HWNL. It would inevitably result in an urbanising and prominent incursion into the rural landscape of the HWNL in a relatively remote location from the settlement, particularly at the eastern end, which would be highly visible in longer views to/from the north and east, as highlighted in the HELAA LSA. (AONB Unit)

The site is identified as part of a medieval field system (Early Post-Medieval fields AD 1500– AD 1599), a key character component of the HWNL's natural beauty set out in the Management Plan. We consider the allocation of the site for development would not conserve and enhance the HWNL, would be contrary to para 189 of the NPPF, and we consider the site should not be allocated for development in the Rother District Local Plan. (AONB Unit)

Southern Water has identified no potential capacity constraints for this site (NR2) at this Local Plan stage. In addition to Rother consulting us on planning applications (for which we are not statutory consultees) so that we can share the results of more checks made closer to the timeline of expected development, Southern Water request the addition of the following wording –

“We encourage early engagement by developers who can make use of Southern Water’s pre-planning service here –

All representations : Rother Local Plan 2025-2042 Development

<https://www.southernwater.co.uk/building-and-developing/planning-your-development/pre-planning-enquiries/>.

Early engagement will be particularly important for the larger site proposals, or where constraints are indicated due to the close proximity to operational wastewater treatment works or where there are critical assets running beneath sites.” (Southern Water)

NR2 Additional policy wording is needed for each site to address it’s proximity to operational wastewater treatment works. The proposed boundary of each site is within 500m of an operational wastewater treatment works (Mill Corner Northiam WTW, and Quickbourne Lane Northiam WTW) and we therefore request the additional wording for each site policy –

“The layout of development for any site allocation with 500m of an operational wastewater treatment works should be informed by an odour assessment to be undertaken in consultation with statutory wastewater operator for the works.” Also, Southern Water infrastructure crosses site NR2 and may require easements or diversion. For NR2, and any sites we’ve previously requested layout wording please also include the following wording: Layout of the development must be planned to ensure future access to existing sewerage infrastructure for maintenance and upsizing purposes. (Southern Water)
Something could have been done more centrally using unused properties or possibly a small portion of the village owned St Francis Fields.
The draft Local Plan regulation 18 consultation has not been based on effective engagement, given that not all supporting documentation has been made available for engagement at all times; this fails the NPPF requirements. Plan making regulations contained within The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) specify that Local Plan, supplementary and evidence base documents need to be available for review for a period of at least 6 weeks. The HELAA was not available for review for 6 weeks, it was less than this required period.
Development should instead be allocated close to the village centre, within areas surrounded by housing and not encroaching into the countryside. Smaller allocations could be accommodated at NOR0022, NOR0036, NOR0027, NOR0031, NOR0020, NOR0018 and NOR0009. These sites are central, enclosed by built form, and would not result in countryside encroachment.
I would like to support the decision that site NOR 0023 Ballard Station Road Northiam has been considered unsuitable for development This large site outside of the village boundary would not be appropriate for development due to its sensitive rural nature .location within the High Weald Special landscape and impact on the landscape of the Rother Valley.
Additional Site Specific Comments
NR1
NR1 and NR2 - While I support providing homes for people and families to stay in the rural village of Northiam, 24 sites were put forward in the Call for Sites but only two chosen, when I believe many sites were as good, if not better, than these two.
For reasons of traffic safety the entry/exit junction for NR1 should be at the southern end of the site, not the north end.
NR2
The NR2 site makes sense. There is an unused brownfield site, former Jewsons, immediately adjacent to NR2 that is unlikely to be suitable for future commercial use. This should be considered alongside NR2 - suitable for 10-12 dwellings. Developing this site before NR2 would have environmental benefits, in replacing a large expanse of concrete hard-standing with mixed residential and in re-using brownfield before reverting to greenfield land.
NR2 Policy text is not correct. It implies that NR2 is bounded by a hedge row to the north. The northern boundary is a stock proof fence owned by the neighbour.
NR2 It distorts the symmetry of the village resulting in a significant distance from the village amenities i.e. school, recreation ground, doctors, church etc. I would have

thought that something could have been done more centrally using unused properties or possibly a small portion of the village owned St Francis Fields.
NR2 Any entrance to the site would have to be via Coppards Lane with the two notorious accident black spots at junctions to A28 and A268 both within a few tens of metres of any entrance.
NR2 Major development of this scale should be avoided in a National Landscape; the NPPF seeks to avoid development of this nature, at this scale at plan making and decision taking stages.
NR2 is not located within the right place to support growth. It is located outside of the village with no access to services. This is echoed within the social objection, which requires development to “to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being;”
Development at NR2 would erode the High Weald National Landscape character, the village setting as it encroaches into the open countryside and would negatively impact the historic environment by developing historic fieldscapes that have been open (Early Post-Medieval fields AD 1500– AD 1599).
If an open field directly opposite the proposed allocated at NOR002 is considered as being inappropriate for development due to any allocation being outside the development boundary, an encroachment into the countryside (HELAA assessment), harmful to the landscape and character of the National Landscape, as well as recognising that the site is some distance from services in the main village and lacks pedestrian connections or access to sustainable transport, then exactly the same planning constraints, policy objections and principles apply to NOR2 given that it is in the same location.
NR2 Our client is very much in support of the allocation and the policy and reaffirms the site is suitable, available and deliverable and the land can be very much developed in line with the council’s policy aspirations and the requirements of Policy NR2. The owner has no objections to these policy requirements and these are easily achievable in any future development scheme.
NR2 The HELAA evidence base consistently identifies the site as unsuitable due to its prominent, open countryside location within the High Weald National Landscape, distance from village services, lack of pedestrian connectivity, and significant landscape harm.
NR2 has been identified through a robust evidence base, has progressed through the HELAA and site selection process, and represents one of the limited deliverable opportunities within Northiam. It is well related to the settlement, capable of being accommodated without unacceptable landscape harm, and supported by a clear and early deliverability position. It therefore makes an important and necessary contribution to meeting the district’s housing requirement. The allocation is integral to a sound and deliverable strategy. Site NR2 should be retained and progressed to the Regulation 19 stage without amendment. (Jarvis Homes)

Any entrance to the site would have to be via Coppards Lane with the two notorious accident black spots at junctions to A28 and A268 both within a few tens of metres of any entrance.

How the main issues have been considered

Responses to general (not site specific) comments

- Comments of Southern Water addressed in policies ENV1-4

NR1

- East Sussex Highways will be consulted on all applications with regard to access to new development.

Question 47

Do you have any comments on the proposed site allocations in Peasmarch, detailed in Policies PE1 to PE5? In your response, please state which site your comment relates to.

Number of respondents: 100 / Number of comments: 141

Main issues raised

Harm to High Weald National Landscape.

Harm to biodiversity.

Harm to dark skies.

Not a sustainable place for new development, nearly all residents are reliant on cars as public transport is almost non-existent. Proposals are based on a series of erroneous assumptions regarding sustainability. Almost all services are concentrated in one location (Jempsons, which is closed on Sundays). Little employment in the village.

Significant surface water drainage issues throughout Peasmarch, high water table.

The sewers need improving before any further development is permitted in Peasmarch. Southern Water's pumping station according to Floodmapping has discharged into a tributary of River Rother 1582 times during 2021 to 2024 for a total of 12098 hours. This can be checked on <https://www.flood-mapper.com/data-explorer/search-sewage-report/58d6d51b-aaf8-11ee-baa2-0242ac140003/Peasmarch/historical>. In 2026, records up to 22nd March 2026 show that there have been 50 dumps so far, totalling 435 hours.

Level of development proposed is too high for Peasmarch, would result in a 20% increase in the existing number of houses, harming the village's character and identity. Proposed density is too high and out of character.

Sites not included in the Neighbourhood Plan should not be allocated, this is contrary to local democracy.

Insufficient infrastructure to cope with new development. Lack of doctors, dentists, school is at capacity. Facilities in Rye are full and turning people away. Frequent power cuts. Issues with drinking water, internet. Infrastructure needs to be improved first.

Increased traffic would cause congestion and harm to road safety including in rural lanes.
No safeguards are proposed to ensure that the new housing would go to local people who need them, there are no measures to prevent houses being bought speculatively to rent out as holiday homes (e.g. Airbnb) or second homes.
Proposed housing would not be affordable to local people.
Proposed site allocations have not considered topography or natural constraints of the area, particularly water flow paths.
Additional site-specific comments
PE1 – Land south of Main Street, Peasmarsh
Please note that as we have already consulted on all existing allocated sites (in adding to offering LPA free consultations at planning application stage) we comment in this response on new/changed site allocation policies, where the site has not previously been allocated and planning applications have not yet been submitted. Southern Water has identified no constraints for these sites at this Local Plan stage. For completeness, in addition to Rother consulting us on planning applications (for which we are not statutory consultees) so that we can share the results of more checks made closer to the timeline of expected development. We request additional wording to encourage early engagement by developers who can make use of Southern Water’s pre-planning service, particularly for larger site proposals (Southern Water).
This scale of development in this location should be considered major development under NPPF 190, and therefore there would be a presumption against it. OBJECT: The site displays a number of the key characteristics of natural beauty as defined in the HW AONB Management Plan, the small fieldscapes bound by historic field boundaries, and a historic PROW running north/south through site, bisecting largest of fields proposed for development. Development of the site would result in the encroachment with extensive built form into the open undeveloped fieldscape which presently contributes positively to the landscape character of the HWNL. It would inevitably result in an urbanising incursion into the rural landscape of the HWNL. The allocation is therefore considered to be contrary to objectives S1, FH2 and PQ2 of the High Weald AONB Management Plan. The proposed allocation would also need to be considered in terms of cumulative impact with PE2 (Existing DaSA allocation Policy PEA1: Land south of Main Street, Peasmarsh). As such, we consider the allocation of the site for development would not conserve and enhance the HWNL, would be contrary to paras 189 and 190 of the NPPF, and we consider the site should not be allocated for development in the Rother District Local Plan (High Weald National Landscape Unit).
A full planning application (ref: RR/2025/1499/P) was submitted in August 2025. The application is supported by a full suite of technical reports which demonstrate that 70 homes can be comfortably accommodated on the site. • The application site measures 3.1 ha rather than 3.2 ha currently suggested at the site size in the ‘Density Statistics’ table. • Development on this site “should” fulfil the criteria (rather than “must”) to provide flexibility (site promoter). • Criteria 4 (new pedestrian links) should be deleted as Jempsons is accessible via Main Street and it’s not clear why a link to School Lane would be necessary.

Criteria 7 (archaeological assessment) should be deleted as this could be required through the planning application validation requirement (Site promoter).
Proposed development (with PE2) is too large and would be very harmful to National Landscape.
The proposed development would increase vehicle volume movement and the positioning of the entrance road would be a dangerous location due to the brow of the hill.
Site has drainage issues which affects Tanhouse Lane and Jempsons, and major surface water flooding issues from the surrounding 300 acres of fields.
PE2 - Land rear of Pippins, Main Street, Peasmarsh
Please note that as we have already consulted on all existing allocated sites (in adding to offering LPA free consultations at planning application stage) we comment in this response on new/changed site allocation policies, where the site has not previously been allocated and planning applications have not yet been submitted. Southern Water has identified no constraints for these sites at this Local Plan stage. For completeness, in addition to Rother consulting us on planning applications (for which we are not statutory consultees) so that we can share the results of more checks made closer to the timeline of expected development. We request additional wording to encourage early engagement by developers who can make use of Southern Water's pre-planning service, particularly for larger site proposals (Southern Water).
PE2/PE3/PE5 Peasmarsh - bus service contributions are likely to be requested, and possibly new bus stops and infrastructure. Noted that PE2 has planning permission, but if this lapses then there should be scope to request the appropriate service and infrastructure improvements (ESCC Transport and Highways).
RDC has already allowed the developer to rescind their agreement to provide 40% affordable housing, so this information in the supporting text needs to be removed as it is no longer true.
Proposed development (with PE1) is too large and would be very harmful to National Landscape.
Site has drainage issues and major surface water flooding issues from the surrounding 300 acres of fields. Would cause flooding to adjacent properties.
Play area is not needed, the village already has sufficient supply.
Dangerous vehicular access.
PE3 – Tanyard, Main Street, Peasmarsh
Please note that as we have already consulted on all existing allocated sites (in adding to offering LPA free consultations at planning application stage) we comment in this response on new/changed site allocation policies, where the site has not previously been allocated and planning applications have not yet been submitted. Southern Water has identified no constraints for these sites at this Local Plan stage. For completeness, in addition to Rother consulting us on planning applications (for which we are not statutory consultees) so that we can share the results of more checks made closer to the timeline of expected development. We request additional wording to encourage early engagement by developers who can make use of Southern Water's pre-planning service, particularly for larger site proposals (Southern Water).

PE2/PE3/PE5 Peasmarsch - bus service contributions are likely to be requested, and possibly new bus stops and infrastructure (ESCC Transport and Highways).
No objection in principle subject to only the northern part of the site being developed, and the other general site-specific comments on our reps letter being addressed (High Weald National Landscape Unit).
This is a Trojan Horse for further development in the future, as it is unlikely that a development of 15 affordable houses would be financially viable for a developer.
The site has major flooding and waterlogging problems which affects the adjacent properties. Run off from the numerous springs in the field, and sewage flooding too to adjacent properties.
Congestion and road safety issues on the road, dangerous access.
The site has been rejected numerous times through the years, including on appeal – see RR/90/0021/P, the reasons for rejection remain valid. Also APP/U1430/W/24/3341060 which was for only one dwelling.
Harm to landscape and rural character within High Weald National Landscape.
Harm to amenity of adjoining occupiers.
Harm to setting of nearby listed buildings.
Harm to enjoyment of users of existing public right of way.
Steeply sloping site unsuitable for development.
PE4 – Land east of Orchard Way, Peasmarsch
Please note that as we have already consulted on all existing allocated sites (in adding to offering LPA free consultations at planning application stage) we comment in this response on new/changed site allocation policies, where the site has not previously been allocated and planning applications have not yet been submitted. Southern Water has identified no constraints for these sites at this Local Plan stage. For completeness, in addition to Rother consulting us on planning applications (for which we are not statutory consultees) so that we can share the results of more checks made closer to the timeline of expected development. We request additional wording to encourage early engagement by developers who can make use of Southern Water’s pre-planning service, particularly for larger site proposals (Southern Water).
In the supporting text it states that “It is allocated for 7 dwellings in the Peasmarsch Neighbourhood Plan”. This is incorrect – Pg 71 of the PNDP states that it should be allocated for up to 5 dwellings.
This site is accessed via a privately owned road with access width for one car. Any access for plant machinery would need to involve overhead cables being moved. There is no mains drainage and therefore any new properties would require a private sewerage system.
The site floods during periods of heavy rain when the drainage ditch and small pond cannot cope.
Harm to adjacent grade II listed building with shallow foundations, also harm to its setting.
PE5 – Land at Malthouse Business Park, Peasmarsch
Please note that as we have already consulted on all existing allocated sites (in adding to offering LPA free consultations at planning application stage) we comment in this response on new/changed site allocation policies, where the site has not

previously been allocated and planning applications have not yet been submitted. Southern Water has identified no constraints for these sites at this Local Plan stage. For completeness, in addition to Rother consulting us on planning applications (for which we are not statutory consultees) so that we can share the results of more checks made closer to the timeline of expected development. We request additional wording to encourage early engagement by developers who can make use of Southern Water's pre-planning service, particularly for larger site proposals (Southern Water).
PE2/PE3/PE5 Peasmarch - bus service contributions are likely to be requested, and possibly new bus stops and infrastructure (ESCC Transport and Highways)
No objection in principle subject to the other general site-specific comments on our reps letter being addressed (High Weald National Landscape Unit).
Loss of employment space detrimental to village economy. It is hard to find affordable business units in the area. Employment use should be retained.
Concern with the disruption to the existing tenants of the business units whilst this build goes ahead. How will this impact the lease agreements they have?
Object to loss of car park which is also used by users of adjacent recreation ground and also for village and community events, e.g. football matches, fetes, jubilees.
Road surfaces will be further damaged by construction. Road and pathways need to be upgraded.
New residential development here may not be suitable given that business activities can be noisy.
The access to Malthouse Lane is unsafe due to a high number of vehicles on The Maltings. Insufficient car parking for new residents.
Close to ancient woodland.
Los of community grit bin.

How the main issues have been considered

General (non-site specific) comments

- Protection of the HWNL is addressed in policies LAN1 and LAN2
- Protection of biodiversity is addressed in policy EN7
- Light pollution and protection of dark skies is addressed in policy LAN4
- Areas of surface water flooding are addressed in the SFRA which forms part of the Local Plan evidence base.
- It is a requirement of the Local Plan to identify new sites if it is adopted at a later date to a 'made' neighbourhood plan.
- Infrastructure needs are considered through the IDP
- The provision of affordable housing is addressed in policy HOU2
- Comments of Southern Water addressed in policies ENV1-4

PE1

- ESCC Highways will be consulted on all planning applications for this site

- Additional policy criterion to address potential need for bus service contributions, bus stops and infrastructure

PE3

- Additional policy criterion to address potential need for bus service contributions, bus stops and infrastructure
- The impact of development on near-by heritage assets has been addressed by additional criteria wording regarding Historic England guidance and additional requirements set out in the supporting text.
- Additional text added to the supporting text setting out access requirements

PE4

- The impact of development on near-by heritage assets has been addressed by additional criteria wording regarding Historic England guidance and additional requirements set out in the supporting text. (additional text to be added to the policy)

PE5

- Additional policy criterion to address potential need for bus service contributions, bus stops and infrastructure.
- ESCC Highways will be consulted on all planning applications for this site
- The allocation proposes to retain employment floorspace at the site
- Residents' concerns about loss of car parking are noted

Question 48

Do you have any comments on the proposed site allocations in Playden, detailed in Policies PL1 and PL2?

Number of respondents: 33 / Number of comments: 34

Main issues raised

PL2: We note that this development is located within the setting of the Highly Grade 1 St. Michael's Church. The allocation is for 14 homes, which is significantly denser than the surrounding context. We welcome the policy criteria seeking to protect the setting of the Church and the enhancement of trees and hedgerows on the site. We would suggest the site's quantum of development is reviewed and the policy criteria strengthened where possible to ensure that the allocation will not cause harm to the significance of the Church. (Historic England)

PL1 The site is highly visible from the A268 Rye Road, which divides the site from the HWNL, and as such there is strong intervisibility.

Development of the site would result in the encroachment with extensive built form into open undeveloped fieldscape which presently contributes positively to the landscape character of the setting of the HWNL. It would inevitably result in an urbanising incursion into the rural landscape of the HWNL, uncharacteristic in this hamlet location. The allocation is therefore not considered to constitute sensitively located development (as per NPPF para 189), and the development of the site would not conserve or enhance the setting of the HWNL. As such, we consider the site should not be allocated for development in the Rother District Local Plan. (AONB Unit)
PL2 Setting of HWNL. No comment – by virtue of distance and separation by built form, site not considered to contribute to setting of HWNL. (AONB Unit)
Housing estates will destroy the settlement's unique character and close the vital "transition space" between Rye and Playden (see PINS decision 17/6/19).
Services infrastructure is already inadequate, in particular drainage, which already fails to cope with the discharge from the existing dwellings on the lane.
Infrastructure – no local amenities, local schools are full, doctor's surgeries are struggling to cope.
The Corner House and the Playden Oasts Hotel are 2 separate properties approximately a third of a mile apart. The Corner House is NOT Grade II listed. The Playden Oasts Hotel is Grade II listed.
Additional Site Specific Issues
PL1
PLA1 The proposed access onto Houghton Green Lane is unlikely to meet highway visibility requirements due to bend in the road. Currently there is a layby with cars parked which restricts the road width at the corner. These car spaces are required by local residents. • The Lane joins the main A268 very close to the junction of the Iden Road and any increase in traffic will cause more confusion for signalling car drivers. The volume of traffic using the A268 during the weekends in summer increases considerably with tourists coming to Rye and the local beaches. There are monitoring cameras located at the brow of Rye Hill because of the traffic flow at this time of year. • The Lane is narrow and cannot be widened at the junction with the A268 due to the houses that abut the road either side. If houses are built the new residents will also drive towards Playden Primary School and the Military Road. The Lane is narrow and in most areas not a full two lanes width and will become more hazardous for children attending the school. • The Lane has ditches down its length and there are deep ruts (very muddy in wet weather) off the tarmacked surface. • The lane is prone to potholes which though regularly repaired soon appear again. This is in part due to water which can

flow across the road but also due to the increasing and heavier cars and vans which use the lane to cut through between the A268 and the Military Road. • The Lane is unrestricted (national speed limit 60) and the school users have complained regarding speeding cars going past the school. East Sussex County Council have been asked for a reduction of speed in the area of the school which has been refused. (Playden PC)
PL1 Street lighting. If street lighting was installed for the new housing, this would affect the dark traditional environment of the area and have an affect on wildlife. (Playden PC)
PL1 Water flow in heavy rain. In times of heavy rainfall the ditches and lower stream are full. Any new housing higher up the lane and the concreting over of fields will cause problems for housing further down the Lane. (Playden PC)
PL1 Unlike most local villages Playden is a dispersed village lying along several country lanes as well as along the A268. There is no modern estate development as newer housing has been dispersed throughout the parish. Therefore a development of houses of this number would be out of keeping with the existing settlement. (Playden PC)
PL1 If any development were to occur on this site the provision of parking for the WI Hall and at a distance no further than currently is most important. Due to the narrow Lane there is no alternative area for users to park. If the same provision was not provided the WI Hall could not survive and would cease to exist. It is the only social and assembly space in the parish used by a variety users. The car park is also used as an overflow car park at weekends for users of the Waterworks tap room - the microbrewery on the opposite side of the A268. A very successful local startup (an addition to the successful Waterworks pub in Rye) and employer. This would also be affected. (Playden PC)
I am concerned about the vehicular access to both PL1 and PL2. Sight lines on Rye Road are difficult as it is without many more vehicles gaining access. New England Lane, at the point of PL2 is a very steep narrow lane with the proposal creating access issues on to A268. The road past PL1 leads to Playden School and is a very narrow lane to have many vehicles gaining access at school times.
PL1 The proposed access route involves land currently leased by Playden Women's Institute for the sole purpose of providing parking for users of the Playden WI Hall. Without the benefit of exclusive off road parking facilities, the hall would not be a viable venue, as there is already a serious parking problem for nearby residents, due to the very narrow and twisty nature of the lane, so the loss of the car park would inevitably lead to closure of the hall. A great deal of time, effort and money has recently been spent on maintaining and upgrading the hall, with generous donations from local residents, and it would be a shame if it were to be lost in this way. We do not object to new housing in principle - we would certainly welcome new WI members and new hall users - however, without the required parking, there won't be a WI Hall to use, and there may not be a Playden WI. (On behalf of Playden WI)
PL1 As a long time member of the Playden Women's Institute, I am worried about the increased traffic on the narrow twisty lane and the lack of parking for users of the WI Hall and local residents. The Hall is used by the local community for various activities, by Playden Parish Council for meetings and by Rother District Council as

a polling station. The disruption to normal traffic, local residents and the school, as well as users of the WI Hall, would be considerable, especially while the building work is in progress
PL1 is remote, poorly integrated with the village and accessed via a narrow lane. The site is unsuitable and should be withdrawn. (CPRE)
PL1 I think that the draft plan has been well thought out and fully appreciate that the targets that the authority is being asked to meet, together with local need, mean that development sites do need to be found. site PL1 if developed in a sympathetic way to preserve rural character while addressing traffic concerns and with a smaller number of dwellings could be suitable.
PL1 Houghton Green Lane is a very narrow road that is already too busy with not enough passing spaces (it is single lane in a number of areas), in a badly kept state, floods in areas and also where it exits on to the A268 in a busy location (Iden road joins very nearby). It experiences significant traffic due to the Primary School and as a cut through to Military Road. This development would result in a huge increase in traffic during construction and also from the new occupiers once complete.
PL1: difficult vehicular access onto narrow lane with no pavements, access constraints; no suitable location for replacement community carpark on Houghton Green Lane.
PL1 Surface water drainage from this site is very likely to flow into the existing stream along the northern boundaries of fields TQ9222 5202, TQ9222 5425 and TQ9222 8320. This stream is already at the limits of it's capacity in carrying all the natural drainage of the land to the south and west of Houghton Green Lane as well as a large land area extending over the hills to the east and north towards Iden. The outflow is into the tidal River Rother via a flap that closes during high water levels in the river, thus preventing any outflow from the stream. Any sizeable increase in the rate of flow into the stream is likely to result in flooding along Houghton Green Lane, the Military Road and the adjoining agricultural land. This problem is very likely to get worse with climate change.
PL1 25 houses cannot be built in a small area with no supporting infrastructure - primary school is full, medical centre is stretched, minimal to non-existent public transport.
PL1 25 dwellings on this site would be out of the question. However, a scheme for a maximum of 3 dwellings could be acceptable. These would need to be extremely well designed. A successful scheme would need to include improved parking for the WI hall and a large contribution would need to be applied improve the already over stretched school, health and water supply services (106 agreement). Visual screening from the A268 would also be a must to maintain the character of the village.
PL1 The footpath from Playden into Rye is not maintained and is only usable by sure-footed people able to tackle the steep hill, inadequate for pushchairs, cycles or mobility scooters. The development would increase traffic and light pollution in an area which lacks infrastructure, so would not be attractive for the intended

demographic. The incentive of a new safe footpath to the school cannot ensure its future maintenance.
PL1 I also cannot understand why access is planned via Houghton Green Lane instead of the main road.
PL2
PL2 New England Lane is a narrow lane and in parts sunken between steep boundaries and descends towards the cliff above the Military Road where the lane terminates. The proposed site will enter onto the top end of the lane, however sightlines would be restricted without having a widening of the road. The junction of the lane with the main road (A268) is close to several roads opposite. The Rye memorial Hospital site is a busy junction with the doctor's surgery, the retirement complex and Hub on the Hill. This will become busier when the 60 bed nursing home is eventually completed on the same site. (Playden PC)
PL2 Street lighting. If street lighting was installed for the new housing, this would affect the dark traditional environment of the area and have an effect on wildlife. (Playden PC)
PL2 Water flow in heavy rain. In times of heavy rainfall the ditches and lane run with water. Any new housing higher up the lane and the concreting over of fields will cause problems for housing further down the Lane. (Playden PC)
PL2 The additional population from the housing will put further strain on the local doctor's surgery especially when the nursing home is completed. (Playden PC)
The site will impact the setting of Playden Church (a grade 1 listed building) which is set back from the A268 down a driveway. The development will be noticeable from the church being only a garden away and will affect its setting. (Playden PC)
PL2 in particular, there is very limited vehicle access to New England Lane (a narrow historic single-track lane set in a hollow way).
PL2 Neighbouring 'Shellfield' site refused for housing twice by RDC and tow appeals have been dismissed by Planning Inspectorate in 2019/2021 as site deemed inaccessible to services and facilities and adverse impact on character and appearance of area.
Proposed density for PL2 too high. Enforce affordable housing if building occurs.
Adverse impact on historic "holloway" (sunken lane) New England Lane
PL2 The strategic gap, with its views of St Michaels Church, a grade one listed property, needs to be preserved. The policy criteria seeking to protect the setting of the Church is welcomed and the enhancement of trees and hedgerows on the site. The site's quantum of development should be reviewed and the policy criteria strengthened where possible to ensure that the allocation will not cause harm to the significance of the Church.
PL2 Saltcote Street, the historic single tracked hollowed passageway leading down to the former fishing port should be preserved.
PL2 is frequently waterlogged as streams flow underground raising the water table with rainfall then lying above. Any proposed development will increase the volumes, finding there way through natural channels, increasing the risk of flood/landslip for the properties and cliff face below.
PL2 The majority of properties within Playden are individually sited detached houses. An estate type development is not in keeping with the villages uniqueness and should be repelled.

PL2 I object to site PL2 on the basis of the very narrow lane access and the rejection of previous planning applications to preserve the rural character of the parish and the heritage and green spaces that delineate it from Rye.

How the main issues have been considered

General (non-site specific) comments

- Infrastructure needs are considered through the IDP

PL1

- Additional wording has been added to the policy criteria and supporting text to address the site access and the approach from Houghton Green Lane
- ESCC Highways will be consulted on all planning applications for this site
- Protection of the HWNL is addressed in policies LAN1 and LAN2
- Light pollution and protection of dark skies is addressed in policy LAN4
- Areas of surface water flooding are addressed in the SFRA which forms part of the Local Plan evidence base.

PL2

- Additional text added to both the criteria and the supporting text regarding the Grade 1 listed church and its setting
- Additional wording has been added to the supporting text to address the site access from New England Lane
- ESCC Highways will be consulted on all planning applications for this site
- Protection of the HWNL is addressed in policies LAN1 and LAN2
- Light pollution and protection of dark skies is addressed in policy LAN4
- Areas of surface water flooding are addressed in the SFRA which forms part of the Local Plan evidence base.

Question 49

Do you have any comments on the proposed site allocations in Rye, detailed in Policies RY1 to RY9?

Number of respondents: / Number of comments:

Main issues raised

RY1 This site is wholly within FZ3, therefore the density of the development should be informed by the level 2 SFRA and site-specific FRA. The FRA will not only need to demonstrate that the development can be made safe by use of appropriate mitigation measures but also that flood risk is not increased elsewhere by increasing flood depths and/or frequency on adjacent land. (Environment Agency)

RY2 We support the inclusion of policies 9,10 and 12 but recommend these are strengthened by including text that ensure that any development has no adverse effect on the integrity of the tidal flood defences; and that access to the defences is maintained, and where possible, improved, in order to allow for inspection, maintenance and future improvements to the defences. The site should also be sequentially tested to ensure higher risk development is in the lower risk part of the site. Applicants should be made aware that environmental permitting regulations will apply due to the presence of defences and the main river. (Environment Agency)
Policy reference: RY3 We support policies 6, 7 and 9. We also support policy 11 which states 'Phase the occupation of the development to align with the delivery of sewerage infrastructure', which should allow for the existing system to better cope with increased sewerage needs. However, this should be strengthened by specifying a specific requirement to connect to mains. (Environment Agency)
While we support policies 4 and 5, the site is wholly within FZ3, therefore the density of the development should also be informed by the Level 2 SFRA and a site-specific FRA. While we understand the reasoning for increasing the site capacity, an increase in dwellings may compromise the site's potential to pass the Exception Test. The FRA will not only need to demonstrate that the development can be made safe by use of appropriate mitigation measures but that flood risk is not worsened elsewhere by increased flood depths and/or frequency on adjacent land. (Environment Agency)
We support policies 6, 7 and 9, however the site is wholly within FZ3, therefore the density of the development should also be informed by the Level 2 SFRA and a site-specific FRA. While we understand the reasoning for increasing the site capacity, an increase in dwellings may compromise the site's potential to pass the Exception Test. The FRA will not only need to demonstrate that the development can be made safe by use of appropriate mitigation measures, but that flood risk is not worsened elsewhere by increased flood depths and/or frequency on adjacent land. Environmental permitting regulations will apply due to presence of defences and main river on/near the site. A policy should be included that ensures that the development has no adverse effect on the integrity of the tidal flood defences and tidal outfall; and that access to the defences and tidal outfall is maintained and where possible, improved, in order to allow for inspection, maintenance and future improvements to the defences and outfall. As this site is adjacent to the River Brede (GB540704016100 - Rother (Transitional)), a policy should be included that states development should not cause the deterioration of water body status, and should encourage development to improve it, if possible. (Environment Agency)
Policy reference: RY7 The site lies within FZ3 and a restaurant would be classed as 'more vulnerable' under the NPPF, resulting in an increase in vulnerability classification. We recommend a policy is included that states the requirement for development to be subject to a site-specific FRA to ensure any development is safe and does not increase risk elsewhere. Environmental permitting regulations will apply due to presence of defences and main river on/near the site. A policy should be included

that ensures that the development has no adverse effect on the integrity of the tidal flood defences; and that access to the defences is maintained, and where possible, improved, in order to allow for inspection, maintenance and future improvements to the defences. The site also includes land owned by the Environment Agency. As this site is adjacent to the River Brede (GB540704016100 - Rother (Transitional)), a policy should be included that states development should not cause the deterioration of water body status, and should encourage development to improve it, if possible. (Environment Agency)
RY9 RY9 The site is wholly within FZ3, therefore the density of the development should also be informed by the Level 2 SFRA and a site-specific FRA. While we understand the reasoning for increasing the site capacity, an increase in dwellings may compromise the site's potential to pass the Exception Test. The FRA will not only need to demonstrate that the development can be made safe by use of appropriate mitigation measures but that flood risk is not worsened elsewhere by increased flood depths and/or frequency on adjacent land. Increasing the allocated number of dwellings on site needs careful consideration. Given the constraints on the site (fluvial, tidal and surface water flooding) any development will need to demonstrate that the development can be made safe without increasing flood risk elsewhere. (Environment Agency)
RY3 infrastructure should include bus stops so that the occupants of apartments for older people can access public transport (although noting that these are likely to need to be on trunk road, so will need the agreement of National Highways). (ESCC)
RY4 upgrades to bus stops and services will be required. (ESCC)
RY5 Public transport and service contributions likely to be required. (ESCC)
RY6 reference to parking provision should be made. (ESCC)
RY6 - Former Council Depot, Cyprus Place The proximity of the site to the Ferry Road level crossing means the impact of pedestrian and car movements need to be considered in respect of railway safety. (Network Rail)
RY9 Former Lower School Site, off Ferry Road, Rye The proximity of the site to the Ferry Road level crossing means the impact of pedestrian and car movements need to be considered in respect of railway safety. (Network Rail)
Southern Water's initial checks indicate that sites RY5 and RY9 may have limited local network capacity, and phasing of development may therefore be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated in each policy. For these sites, and any we've previously requested phasing wording (unless the detailed planning consultation responses we've provided indicate otherwise) please include the following wording: <i>Occupation of development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider.</i> Southern Water infrastructure crosses sites RY5, RY6 and RY9 and may require easements or diversion. For these sites, and any we've previously requested layout wording please also include the following wording: : <i>Layout of the development</i>

<i>must be planned to ensure future access to existing sewerage infrastructure for maintenance and upsizing purposes.</i> (Southern Water)
It is also noted that despite local priorities to include affordable housing – for younger people in the hospitality, care and education industries - that during the planning process for RY3 and RY9 no affordable housing is required to be provided, on grounds of “viability”. (RNP SG and Rye TC)
Rye notes that this section replicates the allocations including small sites, of the Rye NP. Rye will welcome advice on how representations made on this draft plan will be handled to take account of the Rye Neighbourhood Planning process. (RNP SG and Rye TC)
Despite local priorities to include affordable housing – for younger people in the hospitality, care and education industries - that during the planning process for RY3 and RY9 no affordable housing is required to be provided, on grounds of “viability”. (RNP SG and Rye TC)
There is not enough infrastructure to support all of the proposed new homes - not enough school places, doctors, dentists or supermarkets.
All riverside sites should require a riverside walk.
Planning evidence indicates that parts of the Rock Channel area fall within Flood Zone 3 and may also be affected by surface water flood risk. While flood mitigation measures can sometimes be incorporated into development, intensifying residential development in areas of known flood risk requires careful scrutiny, particularly in the context of long-term climate change projections and the resilience of critical infrastructure.
Residents in the wider East Sussex area are aware of ongoing concerns regarding water and wastewater infrastructure capacity. Without clear evidence that sufficient upgrades to water supply and wastewater treatment infrastructure will be delivered, further significant residential intensification risks placing additional strain on existing systems. Local Plan allocations should therefore be supported by clear infrastructure delivery plans.
The Local Plan appropriately emphasises the importance of affordable housing provision. However, locations such as Rock Channel — where land values, construction complexity, flood mitigation requirements and infrastructure constraints are significant — may not represent the most effective locations for delivering meaningful affordable housing provision.
The Local Plan appropriately emphasises the importance of affordable housing provision. However, locations such as Rock Channel — where land values, construction complexity, flood mitigation requirements and infrastructure constraints are significant — may not represent the most effective locations for delivering meaningful affordable housing provision
Additional Site Specific Comments
RY1
RH1_H3 Brownfield: suburban: 25 dwellings: Intentionally the majority of dwellings should be affordable/social and the community centre retained. (RNP SG and Rye TC)

Tilling Green School: We question whether this site is deliverable over the plan period. East Sussex County Council have confirmed they are no longer looking to dispose of the land pending devolution. It is therefore very unlikely this site will come forward within the next 5 years and as such, additional sites should be explored.
RY1 Tilling Green should be developed by the town council's community trust and is a good example of where proper social housing should go with no commercial properties on here.
RY2
RY2 - H5 - Winchelsea Rd East Brownfield: suburban: 10 dwellings and 500 sq m of employment space: Access to flood defences need to be protected. (RNP SG and Rye TC)
RY2 Winchelsea Road within the plan period as the land parcels are within multiple ownerships which creates a protracted land assemble and disposal process.
RY2 The land is reclaimed and required deep foundations in earlier phases, making construction costly and potentially unsuitable for affordable housing
RY2 Affordable housing Considering the points above, expensive. At the same time Rye needs affordable housing with many young people having to move away or being 'stuck' outside the town with nothing to do. The area does not need more holiday accommodation.
RY2 should be left for related river industry sites, is a flood risk and highly unsuitable for housing. Flood Zone 3. 50 cm higher river banks will not fully protect. This is reality. Some of the buildings as designed (with sacrificial ground floors) at over two storeys (3.5+) will be too high and block views of historic Rye, as Bridge Point does.
RY2 We don't need these new homes in town that will end up being second homes and AirB&Bs; restrict second homes and a lot of properties will come back on the market to provide homes for young people. And leave space for employment – so many homes and so few jobs are not sustainable.
RY2 The land is reclaimed and required deep foundations in earlier phases, making construction costly and potentially unsuitable for affordable housing. The site lies in a flood zone beside the tidal Tillingham River, with reduced natural drainage and surface-water risks requiring robust infrastructure.
RY2 Water and wastewater capacity is already constrained locally. High construction costs may limit delivery of genuinely affordable homes. Further concerns include impact on Rye's heritage setting, high proposed density, parking pressures, and increased strain on GP and dental services. A purpose-built health centre should be considered.
RY3
RY3 - H6 - Winchelsea Rd West Brownfield: suburban: 59 dwellings and 1900 sq m of employment space: SuDS is a key requirement, in addition to a bund is required to defend against surface water on the marsh; Rother DC has agreed no affordable? (RNP SG and Rye TC)
RY4

RY4 - H7 - Former Freda Gardham Brownfield: suburban: 50 dwellings and 500 sq m of employment space: Developer is seeking variance to the development boundary to include 6 more dwellings. SuDS is a key requirement, in addition to a bund is required to defend against surface water on the marsh; affordable homes? (RNP SG and Rye TC)
RY4 We propose that the boundary of the site allocation is expanded to accommodate a redundant parcel of land to the north-east side of the site (site plan attached at Appendix A), which is in our ownership. This would allow approximately 6 additional dwellings to meet identified housing needs, and a comprehensive development of the site overall. (Martello)
RY4 Freda Gardham is a rare example of its build type in Rye and provides great potential in refurbishment not demolition
RY4 Rye Creative Centre, provides workspace for over 30 creative businesses including artists, art therapists, textile designers, graphic designers, architects and a daycare centre for artists with disabilities. Alongside this, every week, over 100 members of the local and wider community, use Rye Creative Centre for creative workshops and wellbeing activities. As the plan stands Rye will lose approximately 1000m2 of creative workspace.
RY4 The site extends beyond existing buildings' footprint into Rother flood plain and proposed housing heights of more than 2 storeys will impair views towards Rye and from it — harming the town's historic character. Heights must be limited to 2 storeys.
RY4 If a development results in the loss of existing arts workspace, boroughs can use Section 106 agreements to mandate on-site replacement, or a financial contribution to a "Cultural Land Trust" to secure space elsewhere. There has been some discussion that alternative space will be provided in Rye Harbour, but currently, there are no clear guarantees, and I would like alternative provision to become part of the Rother Local Plan
RY5
RY5 - H4 - Rock Channel Site A Brownfield: suburban: 80 dwellings across two sites with different ownership: SuDS is a key requirement; access to the A259 via St Margaret's Terrace has to be resolved. (RNP SG and Rye TC)
RY5: This was supposed to be a mixed-use development with an arts centre and small park/outdoor theatre planned by Martello development. Why the change to only housing? It is a mistake to make this a housing only area. The impact on traffic on an already crowded Undercliff Road will be significant.
RY5: This was supposed to be a mixed use development with an arts centre and small park/outdoor theatre planned by Martello development. Why the change to only housing? It is a mistake to make this a housing only area.
Parts of the Rock Channel area are located on historically reclaimed land. Development in these areas typically requires more complex foundation solutions and ground engineering works. These additional construction requirements can materially affect development viability and should be properly reflected when assessing realistic housing densities and site deliverability.

RY6
RY6 Rye Hire is an important business in the town and should be retained. There is not other business offering these services, keeping Rye thriving as community not only a tourist destination. It also provides employment for local families. There is no other business providing the same service.
No Ref - Cyprus Place Depot Brownfield: urban: 7 dwellings: Leased to a business, which Rye TC has agreed is of community value. (RNP SG and Rye TC)
RY9 Lower school site plan has too many dwellings on it, we don't need more older people's housing, but do need something for younger people. 130 dph is absurd here. In practice, densities at this level are typically associated with apartment buildings or tightly packed urban terraces in major cities rather than the scale and character of development traditionally associated with Rye
RY7
RY7 - H4 - Rock Channel Site D Brownfield: suburban: 600 sq m of employment space: Only partially flood protected at high tides; ground floors need to be sacrificial. Environment Agency part owns this site. (RNP SG and Rye TC)
RY7 Sites along Rock Channel are a ridiculous proposition with flooding and should remain an industrial area – where are people supposed to work in Rye if every site is built on?
RY8
RY8 - No Ref - 17-19 Tower St Brownfield: urban: 6 dwellings (RNP SG and Rye TC)
RY9
RY9 - H8 - Lower School Site Brownfield: suburban: 88 dwellings: Considered over development at 130 dwellings per hectare. No affordable, (RNP SG and Rye TC)

How the main issues have been considered

- *All site allocations removed from the Local Plan, as the Rye Neighbourhood Plan is at an advanced stage and the sites will be included therein*

Question 50
Do you have any comments on the proposed site allocation in Rye Harbour, detailed in Policy RH1?
Number of respondents: 6 / Number of comments: 6
Main issues raised
We would advise that the policy and/or supporting text in regard to that policy recognises and reflects the potential effects associated with locating residential

development in proximity to an operational wharf. It is recommended that the text ensures that the MCA/WCA is noted and that consultation with the Minerals and waste Planning Authority must be carried out for all development schemes proposed there. (ESCC)
Please note that as we have already consulted on all existing allocated sites (in adding to offering LPA free consultations at planning application stage) we comment in this response on new/changed site allocation policies, where the site has not previously been allocated and planning applications have not yet been submitted. (Southern Water)
Folkestone & Hythe District Council supports the references to the Sustainable Access and Recreation Management Strategy (SARMS) in Policy RH1 as the site is located close to the internationally important nature designations at Dungeness, Romney Marsh and Rye Bay. FHDC will continue to work with Rother DC on the SARMS as it is updated.
We support policy 6 but recommend this is strengthened as the site is wholly in FZ3. The application of the Sequential Test and potential to pass the Exception Test needs to be assessed via a level 2 SFRA.(EA)
The site is adjacent to a waterbody that is functionally linked to the SSSI/SPA/SAC/Ramsar site, we are concerned that the need to protect this watercourse from runoff and pollution during and post construction is not more clearly recognised in the policy wording for this allocation. (SWT)
Lighting will need to be carefully designed, therefore we suggest that this requirement is captured in policy wording. (SWT)
Criterion iii) specifies that development on this site must 'Retain and enhance the tree belt ...' We query whether this fencing is intended to be permanent and what form it will take, as there are potential implications for wildlife and ecological connectivity. (SWT)
We reiterate our concern about the cumulative impacts of development on the natural environment and question the ability of Rother district's natural capital to absorb the proposed level of development without harm. (SWT)

How the main issues have been considered

- Surface water flooding is addressed in the SFRA which forms part of the Local Plan evidence base.
- Light pollution is addressed in policy LAN4

Question 51

Do you have any comments on proposed Policy RH2: Employment Land, Harbour Road?

Number of respondents:2 / Number of comments: 2

Main issues raised

Folkestone & Hythe District Council supports the references to the Sustainable Access and Recreation Management

Strategy (SARMS) in Policy RH2 as the site is located close to the internationally important nature designations at Dungeness, Romney Marsh and Rye Bay. FHDC will continue to work with Rother DC on the SARMS as it is updated.
The village is already experiencing high traffic congestion, following the build of the visitor centre. Adding more traffic and building works will be unbearable.
The wildlife is already suffering, and many birds have left over the past few years. More pollution, noise, light pollution will be the tipping point. Please don't further ruin what was our beautiful little village.

How the main issues have been considered

- Transport modelling work undertaken

Question 52

Do you consider that there are any other possible sites in the Rye and the Eastern Settlements Cluster sub-area (which includes the parishes of Beckley, Brede, Camber, East Guldeford, Iden, Northiam, Peasmarch, Playden, Rye Foreign, Rye, Udimore and Icklesham (east)) which should be allocated for development in the Local Plan?

Number of respondents: 6 / Number of comments: 6

Main issues raised

We put forward a site for consideration. The submitted site already is only 80m away from a bus stop, with links to the village hall, playing field, school and pub. It has a retail outlet onsite which can be retained and turned into a community workshop. Allocation of this site will meet the principles of live well locally and green to the core.

Site at Pond Cottage PEA0039 was rejected as unsuitable but the reasons for not allocating this are inaccurate. This is relation to comments regarding surface water flooding, and it should be made clear this does not affect the significant part of the site as alleged- it is only the outer edge and this can be mitigated and improved by SUDS as shown in the submitted details in the current pending application RR/2025/141 and the FRA.

Site at Pond Cottage PEA0039 The local plan has allocated land for as little as 5 houses. The heritage documents show 10 apartments for older person housing can be accommodated within pending application RR/2025/141 without harm and which is supported by heritage documents and thus this site can deliver specialist housing at a scale suitable for allocation on the site in a sustainable location and in the central part of the village. This could be easily achieved via a number of ways and locations in the site. Adjacent land is also owned by the same owner. This this site should be reconsidered and allocated for specialist housing and the owner would happy to provide reports/assessments and masterplan options if this is helpful. There are also benefits to the long term conservation of the listed building.

I do not believe that other areas have been considered in neighbouring villages and that Peasmarch becomes an expensive area and loses its character in addition proposals for the village particularly PE5, does not take into account present under usage of the business units and do not allow for parking, further exhausted

resources both natural, employment etc. By having similar focus as in other villages and areas mean that employment and resources are evenly spread OUT and also with the move to a super-council, would it not better for further ideas and consultation after reorganisation of local government has been need and local elections taken place ie after May 2026 elections as this is also move ethical and political minded in the sense takes in the needs and wants of constituents council planning. I oppose the plans.

Object to large-scale housing growth across the wider TN31 area. It is a highly valued rural landscape that cannot accommodate hundreds of new properties without harming local identity and environmental quality. Rye Harbour is a designated Site of Special Scientific Interest and supports important bird and wildlife habitats that should not be disrupted. Development levels must reflect the area's environmental sensitivity and limited infrastructure.

How the main issues have been considered

- HEELA reviewed an updated, with Pond Cottage, Peasmarsh. PEA0039 removed from the plan

Northern Rother

Question 53

Do you have any comments on the proposed site allocations in Burwash, detailed in Policies BW1 to BW4?

Number of respondents: 18 / Number of comments: 27

Main issues raised

Southern Water wastewater sewers cross all BW sites (BW1 to 4) and may require easements or diversion. Policies should include the following wording: "Layout of the development must be planned to ensure future access to existing sewerage infrastructure for maintenance and upsizing purposes". (Southern Water)

Development of BW3 & BW4 would be intrusive into the High Weald on the undeveloped side of the road. Existing ribbon development to the south does not justify further ribbon development along Shrub Lane. It would encroach on important open fieldscape, resulting in an urbanising impact on the rural landscape. (High Weald AONB Unit)

The gaps along Shrub Lane provide short and medium views into the valley, which serve to emphasise the rural location and sense of tranquillity.

No existing footpath and no room to install one, and would be essential to retain hedge. Developments would be car-based.

Multiple developments around Shrub Lane would generate substantial additional traffic, worsening congestion, unsafe access onto the A265. Shrub Lane is a narrow road which always has problems with parked vehicles.

Local infrastructure is already under strain, with serious concerns about capacity in schools, healthcare, drainage, water supply and sewers. Development without coordinated infrastructure planning is unsustainable, and no clear provision has been demonstrated to support the numbers proposed.

Recent housing has not sold, calling into question demand for further market housing, while affordable homes for local people, first-time buyers and downsizers remain a priority. Development should instead focus on brownfield sites, village-centre locations, and housing types that meet genuine rural and local needs, including starter homes and accommodation for older residents.
Development would damage biodiversity, the National Landscape and dark skies, changing the character of a well-visited rural area.
Additional site-specific comments
BW1
Site is in multiple ownership. In addition there is currently no legal access, and the access relied upon in the 2017 application (RR/2017/456/P) is no longer available.
Existing Leylandii screening cannot be relied upon, as the trees are non-native, near the end of their life, and likely to be removed for construction and drainage infrastructure. Once removed, development would be highly visible across the valley for decades due to the site's elevated and open aspect.
Initial checks indicate the site may have limited local network capacity. Policy should include the following wording: "Occupation of development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider". (Southern Water)
Criterion xi: It is not clear as to why a package treatment plant is proposed as opposed to connecting to mains, especially as there is already mains drainage on site. Were the developer to want to deliver such plant they will first need to consult with the Environment Agency. (Southern Water & EA)
We support the requirement for SuDS as per Criterion xii. (EA)
The inclusion of designated Ancient Woodland within the red line boundary is unjustified, as it lies on the site's periphery and has no suitable role in the development. Its inclusion risks indirect impacts contrary to Natural England advice, so the boundary should be amended. (High Weald AONB Unit)
BW2
Site is already developed that therefore there would be minimal damage to the National Landscape.
Six dwellings would harm the character of the High Weald NL and the setting of the listed building opposite - further work is needed to establish an appropriate level of development. (High Weald AONB Unit)
No footpath and it is 0.80 miles from the village.
BW3
Provision of a public footway behind a frontage hedge should allow for maintenance and be visible to drivers using the access, and hedge height should be sufficiently low. Having a footway should connect to an existing provision (ESCC)
Excessive density.
Medieval field boundaries.
Site specific development requirements fail to mitigate the problems of building on the site
BW4
Provision of a public footway behind a frontage hedge should allow for

maintenance and be visible to drivers using the access, and hedge height should be sufficiently low. Having a footway should connect to an existing provision (ESCC)
Excessive density.
Medieval field boundaries.
The site specific development requirements fail to mitigate the problems of building on the site

How the main issues have been considered

BW1 – Land north of Shrub Lane, Burwash

- Policy wording amended per Southern Water request in reference to sewerage infrastructure
- Policy wording already highlights the need for a new area of native woodland in the site for multi-functional benefit
- Site boundary amended to exclude the Ancient Woodland to the north-west

BW2 – Land at 101 Shrub Lane, Burwash

- Policy wording already highlights the need to protect the setting of the nearby listed buildings
- Policy wording already highlights the need for a public footpath
- Policy wording amended in reference to sewerage infrastructure and overhead electricity cables

BW3 – Land east of Shrub Lane (north), Burwash

- Policy wording amended to highlight the character of the site and measures needed to mitigate any impact of development.
- Policy wording amended in reference to sewerage infrastructure and overhead electricity cables

BW4 – Land east of Shrub Lane (south), Burwash

- Policy wording added to ensure footways are connected to existing and proposed routes of travel
- Policy wording amended in reference to sewerage infrastructure and overhead electricity cables

Question 54

Do you have any comments on the proposed site allocations in Burwash Common, detailed in Policies BWC1 and BWC2?

Number of respondents: 18 / Number of comments: 27

Main issues raised

Recent development in Burwash Common that is mainly empty and unsold, due to demand is for inexpensive flats near transportation and jobs.
It is vital that ways be found to build affordable or affordably rented housing for villagers. There is a glut of big houses and of unbuilt sites with permission.
Proposed developments would impact on the beauty and tranquillity of the High Weald NL, including its dark skies.
Neither of the sites meet the requirement of sustainability outlined in the draft plan. They too far from the village centre, school, doctors surgery, shop, leading to more car use. Bus service is sporadic and poor, while station is only accessible by car.
Thes sites are located near to a significant junction while this 40mph section of the A265 is dangerous, including for pedestrians and the speed limit is regularly disregarded.
Additional site-specific comments
BWC1
No constraints are identified for these sites at this Local Plan stage. In addition to Rother consulting us on planning applications, we request the addition of the following wording – “We encourage early engagement by developers who can make use of Southern Water’s pre-planning service here – https://www.southernwater.co.uk/building-and-developing/planning-your-development/pre-planning-enquiries/ (Southern Water)
The site lies outside the settlement boundary and its development would encroach into undeveloped fieldscape that contributes to the character and natural beauty of the High Weald National Landscape and the village setting. Creating access would likely require substantial hedgerow and tree removal, and the HELAA LSA identifies the site as sensitive green open space where slope and historic boundary hedges make development difficult to mitigate. (High Weald AONB Unit)
Ancient/ medieval field.
Site’s development would effectively open the stretch between it land Linkway for development.
The proposed site also is on a hill where the soil is made up of clay when ever it rains some of the water runs across the field onto the road or into a small ditch at the back of the hedge causing a flood pond to form in the corner by Highweald house and when the rain is heavy flood water it then continues across the footpath of the A265 into the drainage system.
Designated as an 'Area that Could become Important for Biodiversity (ACIB).
Would constitute ribbon development
BWC2
No constraints are identified for these sites at this Local Plan stage. In addition to Rother consulting us on planning applications, we request the addition of the following wording – “We encourage early engagement by developers who can make use of Southern Water’s pre-planning service here – https://www.southernwater.co.uk/building-and-developing/planning-your-development/pre-planning-enquiries/ (Southern Water)
No objection in principle subject to the other general site-specific comments on our reps letter being addressed. (High Weald AONB Unit)
The site is subject to an Article 4 Direction intended to provide tighter control over development that could harm character, landscape and amenity. Policy BWC2 fails

to apply this increased restraint and instead treats the site as ordinary infill, with the allocation of nine dwellings conflicting with the purpose of the Direction.
A density of approximately 9 dwellings on a 0.3 hectare greenfield site represents an urbanising intensity that is fundamentally at odds with the purpose of the AONB designation.
Would have an adverse impact on neighbouring residences, due to overdevelopment and reliance on trees as screening that are not effective at lower levels.
Allocation could cause issues in relation to the availability of car parking for the popular café, while the car park is currently inadequate. The layby on the road takes few cars. Cafe parking spaces should be increased by using part of the allocated site.

How the main issues have been considered

BWC1 – Land south of Heathfield Road, Burwash Common

- Policy wording amended to highlight the character of the site and measures needed to mitigate any impact of development
- Policy wording added to ensure ACIB is considered in the scheme design
- Policy wording amended in reference to overhead electricity cables

BWC2 - Old Orchard Nursery, Heathfield Road, Burwash Common

- Policy wording added to ensure footways are connected to existing and proposed routes of travel
- Policy wording already highlights the need to retain boundary trees for screening

Question 55

Do you have any comments on the proposed site allocations in Etchingham, detailed in Policies EC1 to EC3?

Number of respondents: 18 / Number of comments: 27

Main issues raised

No constraints are identified for these sites at this Local Plan stage. In addition to Rother consulting us on planning applications, we request the addition of the following wording – “We encourage early engagement by developers who can make use of Southern Water’s pre-planning service here – <https://www.southernwater.co.uk/building-and-developing/planning-your-development/pre-planning-enquiries/> (Southern Water)

Infrastructure is constrained, with pressures on local medical services, school places, station car park, and utilities including parish drainage and sewage capacity problems; 70 dwellings is considered too high without added investment. Lack of services means that developments would be car-dependent.

Highway safety concerns, especially on Straight Mile, due to heavy traffic and lack of calming measures.

Location at the confluence of the Rivers Limden, Rother and Dudwell where sensitive landscape, biodiversity and heritage are interrelated, requiring stronger protection and clearer policy alignment with the High Weald Management Plan.
Construction noise in a confined area could significantly affect nearby homes and home-working residents.
Dudwell Valley has high ecological value, including 1,000 species of moth, Bats, Barn and Tawny owls, Swallows, Woodpeckers and Deer, and Red Belly Newts.
Need for more affordable housing to help retain local young people and families.
Avoid unnecessary external lighting and follow Policy LAN3 and High Weald dark skies guidance.
What is the basis for requiring Etchingham to provide 70 new dwellings?
Opposition to pastiche design; preference for experienced housing architects.
Additional site-specific comments
EC1
Southern Water infrastructure crosses site EC1 and may require easements or diversion. Please also include the following wording: "Layout of the development must be planned to ensure future access to existing sewerage infrastructure for maintenance and upsizing purposes." (Southern Water)
As the site partly within FZ2 and FZ3, we support the policy to sequentially test the site and retain the southern part of the site (within FZ2 and FZ3) as green infrastructure.
Environmental permitting regulations will apply due to presence of defences and main river on/near to this site. A policy should be included that ensures that the development has no adverse effect on the integrity of the tidal flood defences and tidal outfall; and that access to the defences and outfall is maintained, and where possible, improved, in order to allow for inspection, maintenance and future improvements to the defences and outfall. (Environment Agency)
Poor junction access, limited parking and restricted visibility on Oxenbridge Lane.
No emergency access.
Privacy concerns with potential for overlooking.
I live in one of the affected houses and we have a bat nursery in our eaves. A development like this will cause the bats distress at best and complete loss at worse.
EC2
Although a small allocation, the site would significantly encroach into undeveloped fieldscape that contributes positively to the character and natural beauty of the High Weald National Landscape. The nearby historic railway cottages do not set a precedent for development on this undeveloped western side. The HELAA confirms the site is contiguous with the wider AONB and that development would be out of character. Accordingly, the allocation would not conserve or enhance the HWNL, would conflict with NPPF paragraph 189, and should not be taken forward in the Local Plan. (High Weald Unit)

As the southern part of the site is in FZ2 and FZ3, we support the policy to sequentially test the site and limit development to the northernmost portion outside the area at risk of flooding. (Environment Agency)
It is in a flood zone 3b. The road regularly floods so that it has to be closed. The flooding is caused by a combination of surface water runoff and groundwater emergence, not a single easily mitigated source (please see Flood Risk Study (https://rother.oc2.uk/a/5n7). The lane sits in a low-spot, constrained by a railway embankment which limits the conveyance of flows. The water runs off all the fields opposite the cottages. In past years several of the houses have flooded.
Lane is narrow and lacks footways and lighting; development would increase risk to pedestrians and exacerbate existing parking issues.
Reduce EC2 to five homes in two groups, following the neighbourhood plan architect's layout.
EC3
Allocation would constitute major development under NPPF paragraph 190. The elevated, medieval field is highly prominent and forms a clear rural edge to Etchingham. Allocation would extend the settlement westwards beyond the clear settlement edge formed by Parsonage Croft, urbanising an undeveloped fieldscape that contributes to the character, setting and natural beauty of the High Weald National Landscape. Existing sporadic development to the south does not set a precedent due to differing topography. The site is also recorded as good quality semi-improved grassland. The allocation would conflict with HW AONB Management Plan objectives and NPPF paragraphs 189 and 190 and should not be included in the Local Plan. (High Weald Unit)
We generally support the Council's strategy, but any development must be in line with the character of the village and is contingent upon the provision of the appropriate infrastructure. The EC3 site cannot accommodate 55 dwellings. (Site landowners)
Surface and foul drainage are inadequate, with risks to the River Dudwell and existing overloads in the village system.
Melding of Etchingham and Burwash into a town.
EC3 is ribbon development that would remove the village edge at Jubilee Wood.
EC3 is grade 3 "best and most versatile" agricultural land that supports local farming.

How the main issues have been considered

EC1 - Land at Oxenbridge Lane, Etchingham

- Policy wording added in reference to sewerage infrastructure
- Policy wording added regarding tidal flood defences

EC2 - Land at Church Lane, Etchnigham

- Policy has been deleted in light of environmental constraints.

EC3 - Croft Field, Etchingam

- Dwelling number reduced from 55 to 30 and policy wording amended to highlight the character of the site and measures needed to mitigate any impact of development
- Policy wording added in reference to overhead electricity cables
- Policy wording added to ensure ACIB is considered in the scheme design

Question 56

Do you have any comments on the proposed site allocations in Hurst Green, detailed in Policies HG1 to HG4?

Number of respondents: 18 / Number of comments: 27

Main issues raised

No constraints are identified for these sites at this Local Plan stage. In addition to Rother consulting us on planning applications, we request the addition of the following wording – “We encourage early engagement by developers who can make use of Southern Water’s pre-planning service here – <https://www.southernwater.co.uk/building-and-developing/planning-your-development/pre-planning-enquiries/> (Southern Water)

Concern that 239 homes is too many for Hurst Green given limited facilities; cross-boundary and infrastructure impacts must be considered with Kent County Council as well as East Sussex County Council. (Tunbridge Wells BC)

Infrastructure and services are insufficient for 239 homes; concern over travel demand and limited public transport, jobs and facilities. Concern that more traffic would worsen pedestrian safety, school-run impacts and pollution. A bypass must be considered alongside this scale of growth.

More residents could support younger households, families, local services and community vitality.

Support for a pedestrian crossing north of the village across the A21.

Loss of greenfield sites, impacting on landscape (National Landscape), biodiversity and the rural character of the village. Brownfield sites in village should be utilised first.

HG3 and HG4 undermine recently made Neighbourhood Plan.

Allocations must adhere to Neighbourhood Plan Design Codes. 35 dph is almost 50% higher than any existing Hurst Green character area.

HG1, HG2 & HG4: All sites which abut the SRN will need to consider any boundary issues, eg drainage, lighting, geotechnical, boundary treatments, in consultation with us. (National Highways)

HG1, HG2, HG3 & HG4: All sites which propose to utilise an existing SRN access will need to fully assess any impacts arising from the proposed development traffic. It is important to note that we would not support the intensification of use of an existing SRN access where there would be a detrimental impact on safety. Any proposed upgrade/improvement of an existing SRN access would need to be fully assessed in line with the relevant guidance set out in DfT Circular 01/2022 and DMRB.

For all sites where SRN access is critical to the deliverability of the development, the required assessments should be undertaken as soon as possible, in advance of the Regulation 19 submission. (National Highways)
Additional site-specific comments
HG1
There is an ancient and/or veteran tree mapped in the south-east corner of this allocation. Ancient and veteran trees are irreplaceable habitats. Appropriate semi-natural buffers must be put in place. (ESCC)
HG1 will provide greenspace and much needed parking (including for primary school), along with safety features on the A21.
Site's development would remove a greenspace used for walking.
HG2
Support parking provision for the church.
HG3
Southern Water infrastructure crosses site HG3 and may require easements or diversion. Please also include the following wording: "Layout of the development must be planned to ensure future access to existing sewerage infrastructure for maintenance and upsizing purposes." (Southern Water)
35 dwellings is considered ambitious given retention of the historic stream/ditch field boundary. The policy should require a compact, terraced layout, similar to Foundry Close, to achieve this. (High Weald AONB Unit).
The need to increase vehicle access via Foundry Close would be a nuisance. Parking here is already a significant issue.
Density is too high, while parking provision should be above-guidance levels to redress significant community parking deficit.
HG4
Southern Water's initial checks indicate that site HG4 may have limited local network capacity, and phasing of development may therefore be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated in each policy. Please include the following wording: "Occupation of development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider." (Southern Water)
The proposal constitutes major development under NPPF paragraph 190 and carries a presumption against approval. Its scale would uncharacteristically extend and dominate the settlement, resulting in a significant urbanising incursion into undeveloped High Weald fieldscape that contributes positively to landscape character and the village's rural setting. The site reflects the small-scale, enclosed field pattern typical of the High Weald, and limited visibility does not justify development. The allocation would harm the High Weald National Landscape, conflict with AONB objectives and NPPF paragraphs 189 and 190.
'Public interest' in this context should reflect that protected landscapes are statutorily designated landscapes and protected for the nation's benefit, in the national interest. (High Weald AONB Unit)
150 additional dwellings would create significant traffic that directly accesses the A21.

Support on the basis that HG4 could fund key infrastructure, including Coopers Corner safety works, traffic calming and better walking/cycling links, meeting “exceptional circumstances” and “public interest” tests.
Any future development options should avoid potential future bypass and relief road locations. This site would foreclose a bypass.
There is an acute issue with affordable housing providers taking on smaller s.106 quotas on site. In contrast, 60 affordable homes would be a meaningful, fundable contribution.
A high-pressure gas main running under the northern part of the site poses a significant limitation on the development potential of a significant portion of the site
Destruction of non-designated heritage asset (The Lodge).
Would be significantly harmful to Dark Skies within the HWNL.
The northern field is required as the biodiversity receptor site for HG2.
150 dwellings unachievable given site constraints.

How the main issues have been considered

HG1 - Land south of Iridge Place, London Road, Hurst Green

- Policy wording added to require a school drop off and crossing
- Policy wording added to ensure adjacent ACIB is considered in the scheme design
- Policy wording added to highlight the need for early engagement with National Highways on the connection and location of the site in relation to the A21

HG2 - Land South of Lodge Farm, Hurst Green

- Policy deleted because the site is now under construction.

HG3 - Land to Rear of The Olde Bakery, London Road, Hurst Green

- Dwelling number reduced from 35 to 25 and policy wording amended to highlight the character of the site and measures needed to mitigate any impact of development
- Policy wording amended in reference to sewerage infrastructure
- Policy wording amended to ensure active travel routes are connected to existing and proposed routes of travel
- Policy wording amended to highlight the need for early engagement with National Highways on the connection and location of the site in relation to the A21

HG4 - Land at The Lodge, London Road, Hurst Green

- Policy wording amended to highlight the character of the site and measures needed to mitigate any impact of development, and the public benefit associated with the development
- Policy wording added in reference to sewerage infrastructure and overhead electricity cables
- Policy wording added to ensure adjacent APIB is considered in the scheme design
- Policy wording amended relating to active travel routes connecting to existing and proposed routes of travel
- Policy wording amended to highlight the need for early engagement with National Highways on the connection and location of the site in relation to the A21

Question 57

Do you have any comments on the proposed site allocations in Robertsbridge, detailed in Policies RB1 to RB6b?

Number of respondents: 26 / Number of comments: 28

Main issues raised

The proposed boundary to sites RB2, RB3 and R4 are all within 500m of Robertsbridge wastewater treatment works and we therefore request the following additional wording for these policies:

“The layout of development for any site allocation with 500m of an operational wastewater treatment works should be informed by an odour assessment to be undertaken in consultation with statutory wastewater operator for the works.”

Infrastructure crosses sites RB3 and RB5 and may require easements or diversion. For these sites please include the following wording:

“Layout of the development must be planned to ensure future access to existing sewerage infrastructure for maintenance and upsizing purposes.”
(Southern Water)

Southern Water request the addition of the following wording for all sites – “We also encourage early engagement by developers who can make use of Southern Water’s pre-planning service here –

<https://www.southernwater.co.uk/building-and-developing/planning-your-development/pre-planning-enquiries/>.” (Southern Water)

Concern about insufficient water, sewerage and power infrastructure.

146 dwellings across RB6a/RB6b is considered excessive, adding pressure to Northbridge Street and harming the Conservation Area’s character.

RB1, RB3, RB6a and RB6b: bus service contributions are likely to be required. (ESCC)

Scale of growth is excessive for the village, harming residents’ quality of life, wildlife and greenfield land.

Concern about village parking pressure and lack of on-street EV charging; new schemes should provide enough parking.

School-time congestion is a concern, especially for sites accessing George Hill near the primary school and nursery.

Parish Council does not support development of the Bishops Lane site. (Salehurst & Robertsbridge PC)
RB1 & RB3: All sites which abut the SRN will need to consider any boundary issues, eg drainage, lighting, geotechnical, boundary treatments, in consultation with us. (National Highways)
RB1, RB2 & RB3: For sites located near to the SRN, it will be particularly important that they are supported by an appropriate Transport Assessment at the planning application stage and are advised to seek early engagement with us at the pre-application stage. However, this does not preclude the need for Transport Assessments for sites which are located further away which are of a development quantum which could have a material traffic impact on the SRN. (National Highways)
Additional site-specific comments
RB1
Surface water runs off site into adjacent gardens in Heathfield Gardens.
Many protected species on site.
The proposed allocation would constitute a significant extension southwards (up the slope) from the site allocated in the Neighbourhood Plan. We cannot comment further on the suitability of this site, and impacts on the HWNL, without the benefit of Landscape Sensitivity Studies, which would need to include consideration of the elevated topography of the site, and its wooded nature, prior to allocation. (High Weald AONB Unit)
We support the requirement for SuDS as per Criterion xii. (EA)
RB2
The planning permissions relating to this site will lapse this year, so a refresh is required and a review needed on bus services, which will likely require contributions to improve services. (ESCC)
Housing will sit on higher ground, looming over ours and the houses opposite, dramatically changing the feel of the road.
An ancient routeway to the Abbey was found across Grove Farm.
RB3
We cannot comment further on the suitability of this site, and impacts on the HWNL, without the benefit of Landscape Sensitivity Studies, which would need to include consideration of the topographical setting of the village, and that the southern part of this site is on highly elevated ground. The linear nature of site, running between existing development and the A21 road could be considered to reduce the impact of development here on the HWNL, subject to the further studies prior to allocation. (High Weald AONB Unit)
Site is elevated and currently serves as a buffer between the village core and the surrounding countryside. 70 houses would constitute significant landscape harm, and have an overwhelming effect on village. Grove Farm is a site of high historical significance to the village, and high quality agricultural land.
Concern that extra traffic on Fair Lane would worsen pinch points and would impact on the structure of listed buildings along the Lane.
An ancient routeway to the Abbey was found across Grove Farm.

Policy wording should allow a standalone vehicular access from George Hill to maintain viability and avoid reliance on third-party land. Discussions with Highways indicate that the policy restriction is not required on technical grounds. (Site landowner)
RB5
Should include criterion that any development include a site-specific flood risk assessment. (EA)
Should include criterion that ensures development has no adverse effect on the integrity of the flood defence embankment; and that access to the flood defence embankment is maintained and where possible, improved, in order to allow for inspection, maintenance and future improvements to the flood defence embankment. (EA)
RB6a
General support for RB6a.
Both RB6a and RB6b should form a single allocation for 125 dwellings and delivered comprehensively as one scheme. (Homes England)
Homes England support the 25–45 dph range in principle but want flexibility for site-specific design; pre-application discussions suggest about 23 dph gross and 52 dph net. (Homes England)
Preferred residential use of the Oast House and there being no discernible market to provide 1,200sqm of commercial space on the site, with 150sqm of commercial space proposed on the ground floor of the Mill Building instead. (Homes England)
Homes England question viability of the affordable housing requirement and seek wording tied to updated viability evidence or “subject to viability testing”. (Homes England)
Emergency access is no longer needed if the main access is slightly raised. (Homes England)
RB6b
The allocation may constitute major development under NPPF 190, particularly cumulatively with RB6a, creating a presumption against it. However, it is limited to development necessary to enable RB6a’s viable redevelopment. This is presumed to include restoring the listed oasthouse and the historic mill (a non-designated heritage asset), which could amount to ‘exceptional circumstances’ and public benefit under NPPF 190. Policy should clarify that the site can only come forward as part of a comprehensive scheme with RB6a, including restoration of both assets, with phasing conditions to secure delivery. (High Weald AONB Unit)
The site exhibits key characteristics of natural beauty identified in the HW AONB Management Plan, including a medieval field, historic field boundaries, and a historic PROW. Further assessment of suitability and potential impacts on the HWNL requires Landscape Sensitivity Studies, including effects on these features and the historic settlement pattern around the Conservation Area, prior to allocation. (High Weald AONB Unit)
Concern that access from the A21 lay-by would harm village character.
Support for requirement to provide a safe emergency access outside of FZ3. (EA)
Site specific FRA must include: - No increase in flood risk (depth or frequency) on or off site. - Provide level-for-level / volume-for-volume flood storage compensation.

- Likely require numerical modelling

Development must comply with environmental permitting regulations, not adversely affect flood defence assets and maintain/improve access to these assets, and where possible, improve their performance.

Policy should ensure no culverting of the River Rother or its deterioration during or after development. Strong support for policy encouraging improvements to the watercourse – noting it is currently heavily modified. (Environment Agency)

How the main issues have been considered

RB1 - Land south of Heathfield Gardens, Robertsbridge

- Dwelling number reduced from 65 to 55 and policy wording amended to highlight the character of the site and measures needed to mitigate any impact of development
- Policy wording amended to highlight the need for early engagement with National Highways on the connection and location of the site in relation to the A21
- Policy wording added in reference to overhead electricity cables

RB2 - Grove Farm, Robertsbridge

- Merged with RB3
- Whole site dwelling number reduced from 102 (32 for RB2 + 70 for RB3) to 92 and policy wording amended to highlight the character of the site and measures needed to mitigate any impact of development
- Policy wording amended to reflect to sewerage infrastructure and overhead electricity cables
- Policy wording added to highlight the need for early engagement with National Highways on the connection and location of the site in relation to the A21
- Policy wording added to highlight the preferred access option to the site

RB3 - Land at Grove Farm (Phase 2), Robertsbridge

- Merged into RB2

RB4 - Vicarage Land, Land south of the western end of Fair Lane, Robertsbridge

- Policy wording amended to reflect to sewerage infrastructure

RB5 - Culverwells, Land north of Station Road, Robertsbridge

- Policy wording amended to highlight the character of the site and measures needed to mitigate any impact of development
- Policy wording added to require site specific flood risk assessment
- Policy wording added relating to the existing flood embankment on site
- Policy wording amended to reflect to sewerage infrastructure
- Policy wording added to ensure ACIB is considered in the scheme design

RB6a - Hodson's Mill, Northbridge Street, Robertsbridge

- Merged with RB6b
- Whole site dwelling number reduced from 146 (96 for RB6a + 50 for RB6b) to 125 and policy wording amended to highlight the character of the site and measures needed to mitigate any impact of development, and the public benefit associated with the development
- Policy wording added to highlight the need for early engagement with National Highways and ESCC on contributions to bus services and relating to the connection and location of the site in relation to the A21
- Policy wording amended to replace the employment floorspace requirement, with flexible floorspace use
- Policy wording added highlighting the measures required relating to River Rother running through the site and associated flood risks
- Policy wording amended to reflect overhead electricity cables
- Policy wording added to ensure ACIB is considered in the scheme design

RB6b - Openfield, north of Northbridge Street, Robertsbridge (extension to Mill site)

- Merged into RB6a

Question 58

Do you have any comments on the proposed site allocations Staplecross, Ewhurst parish, detailed in Policies SC1 and SC2?

Main issues raised

Number of respondents: 26 / Number of comments: 28

Impacts on a small village. Increase traffic on an existing busy road, potentially dangerous to pedestrians. Would overwhelm services and facilities. Already problems with water and energy supply; water has to be pumped uphill to the village, while pylons are vulnerable to winds. Lacks public transport. The school is not big enough, local secondary schools are at capacity, and local GP surgeries are unable to cope.

Staplecross does not score well in the Sustainability Appraisal.

No housing demand locally for further development – the last new build development took years to sell the houses in it. Last known Housing Need Survey in 2010 identified the need for 5 or 6 affordable houses over 20 years, resulting in the Hop Gardens rural exception site development.
Not sustainable as residents would need to travel to work.
Both sites are located along exposed ridgetop of sensitive and historic High Weald Landscape, and would blight both longer views and local views from the Public Right of Way.
Large estate-style housing is out of keeping with the historic hamlet.
Top-down planning not linked to analysis of local demand.
Southern Water has identified no potential capacity constraints for these sites at this Local Plan stage. (Southern Water)
Existing footpaths are too narrow for increased pedestrian use.
There have been 484 hours of discharge of raw sewage into the River Tillingham. Sites should not go ahead until Southern Water can confirm completion of work at waste water plant at Southwater Outfall.
Additional site-specific comments
SC1
It is a medieval assart with historic field boundaries of irreplaceable heritage value, and forms an important undeveloped gap that contributes directly to the rural character and setting of the village. The mature roadside hedgerow is a significant feature of the local streetscape that would be placed at risk. Proposed number of dwellings would be harmful.
Southern Water infrastructure crosses site SC1 and may require easements or diversion. Please also include the following wording: “Layout of the development must be planned to ensure future access to existing sewerage infrastructure for maintenance and upsizing purposes. (Southern Water)
We cannot comment further on the suitability of this site, and impacts on the HWNL, without the benefit of Landscape Sensitivity Studies. (High Weald AONB Unit)
Though a relatively large allocation, there could be potential for development of this site without adversely impacting on settlement form, sitting between the recent Stockwood Meadow development and the ribbon development to the east of the site. The site, though in character a valuable part of the HWNL landscape, contributes less to the rural setting of the village than other sites. However, prior to allocation, the LSS will need to consider the matters raised in the HELAA LSA, which says that ‘The site contributes to the rural character of the area and the sloping topography makes it more susceptible to views from across the small valley and the PROW.’ (High Weald AONB Unit)
Site is available, achievable and deliverable for 25 dwellings and can meet all policy criteria. Well related to the village. (Land owner)
SC2
Development of this site would be highly intrusive into HWNL landscape. Notwithstanding the sporadic ribbon development on the southern side of the road here, the relatively recent exception site of Hop Gardens, forms a clear and legible boundary to the eastern edge of the settlement. Development here would result in a significant incursion with built form into an open gap of undeveloped fieldscape that

contributes positively to character and natural beauty of the HWNL, and adversely impacting on settlement form and setting. Exception sites should not in themselves set a precedent for further adjacent development on the basis of the existing 'exception' development. As such, we consider the allocation of the site for development would not conserve and enhance the HWNL, would be contrary to para 189 of the NPPF, and we consider the site should not be allocated for development in the Rother District Local Plan. (High Weald AONB Unit)
Would significantly impact on incredible views from the village.
Used by wildlife including Great Crested Newts as corridors to migrate to different ponds. Would also be at increased risk due to on site traffic.
The site/developable area is too small and would leave no space for on-site BNG, and therefore necessary to expand the overall allocated area. The proposed section is in any case the most visually prominent. Registered Providers prefer to purchase larger numbers of affordable units on smaller sites - likely that the allocation would result in off-site affordable housing.
Would set a dangerous precedent for future encroachment into the National Landscape.

How the main issues have been considered

SC1 - Land east of Stockwood Meadow, Northiam Road, Staplecross

- Policy wording amended to highlight the character of the site and measures needed to mitigate any impact of development
- Policy wording amended to reflect to sewerage infrastructure
- Policy wording added to ensure footways are connected to existing and proposed routes of travel

SC2 - Land east of Hop Gardens, Northiam Road, Staplecross

- Dwelling number increased to 10 from 8
- Policy wording amended to highlight the character of the site and measures needed to mitigate any impact of development
- Policy wording amended to reflect overhead electricity cables

Question 59

Do you have any comments on the proposed site allocations in Flimwell, Ticehurst Parish, detailed in Policies FW1 to FW3?

Number of respondents: 26 / Number of comments: 28

Main issues raised

Cross-boundary impacts and infrastructure coordination with Kent County Council, as well as East Sussex County Council, must be addressed. (TWBC)

Village and nearby services and infrastructure will not cope with additional development, including water supply and sewerage, schools, closure of Ticehurst surgery, schools congestion and road surfaces.
Flimwell is not a sustainable location. Facilities and services cannot be reached by cycling or walking. Public transport is inadequate. Site will increase dependency on cars, the volume of traffic and pedestrian risk.
Proposals amount to uncharacteristic back land development, uncharacteristic of the existing settlement pattern.
The Sustainability Appraisal does not adequately assess the cumulative impacts of sites.
Contrary to Neighbourhood Plan and democratic process.
Additional site-specific comments
FW1
No objection in principle subject to the other general site-specific comments in our reps letter being addressed. (High Weald AONB Unit)
Bus service contributions will be required. (ESCC)
Criterion ii. should identify that multiple Highway Authorities, including Kent County Council, must confirm the suitability of the proposed new vehicular access. (TWBC)
Would risk pollution of the ghyll system and tributaries of the River Bewl. Wardsdown Woodland is recognised by the Woodland Trust and monitored by the Kent Botanical Society for its rare sphagnum bogs, specialist mosses and water-dependent plant species. The site itself is ranged over by Noctule and Natterer's bats roosting in the Woodland.
While the widened section ending just south of Copperfield Cottage is in the ownership of the developer, the remaining length of the track is owned by Wardsdown Woodland, Title No. ESX 133909 which indicates absolute rights over the southern end of the track as described for all vehicles at all times for any purpose.
The shrubs and trees on the west boundary are not in the ownership of the proposed development site.
Wording of Criterion iii to restrict development to "southern half of the site only" is inflexibly worded, unquantified, and would make the target of 32 dwellings and other site requirements undeliverable. Should be removed or replaced with "as much as possible". (LO of site)
The houses of Fruifields have a channel underneath allowing water run-off from Union Street to flow down to the fields at the back, leaving them very waterlogged.
The area marked in yellow was historically used as an informal dumping ground.
FW2a, FW2b
Any proposed upgrade/improvement of an existing SRN access would need to be fully assessed in line with the relevant guidance set out in DfT Circular 01/2022 and DMRB. Assessment should be undertaken as soon as possible, in advance of the Regulation 19 submission. For sites located near to the SRN, it will be particularly important that they are supported by an appropriate Transport Assessment at the planning application stage and are advised to seek early engagement with us at the pre-application stage.

All sites which abut the SRN will need to consider any boundary issues, eg drainage, lighting, geotechnical, boundary treatments, in consultation with National Highways. (National Highways)
Southern Water’s initial checks indicate that site FW2 may have limited local network capacity, and phasing of development may therefore be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated in each policy. Southern Water infrastructure crosses site FW2 and may require easements or diversion. For FW2, and any sites we’ve previously requested layout wording please also include the following wording: Layout of the development must be planned to ensure future access to existing sewerage infrastructure for maintenance and upsizing purposes. (Southern Water)
This proposal constitutes major development. The scale of development conflicts with the area’s linear settlement pattern and would form an uncharacteristic, dominant village extension. The claim that the site is “enclosed” within the High Weald is typical of its landscape character and does not justify major development or reduce harm to its natural beauty. The proposal conflicts with the High Weald AONB Management Plan and NPPF paragraphs 189–190. (High Weald AONB Unit)
Bus stop upgrades in the form of Real Time Passenger Information and service contributions are likely to be sought. It is not clear why this site warrants such specific attention when the LLFA will review drainage strategies for all major proposals in line with its statutory duty. (ESCC)
Change wording to state that a drainage strategy will be agreed in “consultation” with the LLFA, rather than in “conjunction”. (ESCC)
Criterion ii should require confirmation from all relevant highway authorities, including Kent County Council. (TWBC)
Would preclude use of land for improvements to A21.
Nearby A21 junction is near capacity and that pedestrian crossings and footways along Hawkhurst Road are poor.
Site density is too high.
Some sporting facilities could be considered, including improved routes into Bedgebury Forest for pedestrians and cyclists. Desire for a pump track within the parish. (Ticehurst PC)
FW2a
This site displays a number of the identified character components of the HWNL’s natural beauty set out in the Management Plan; it is part of a medieval field system (assart fields AD 1066 – AD 1499), bound with historic field boundaries, and is bordered on its north-eastern edge by Ancient Woodland. (High Weald AONB Unit)
Proposed site density of 35 dph is appropriate. (LO of FW2a)
FW2b
The site exhibits key components of High Weald natural beauty, including medieval assart fields (AD 1066–1499) and a northern boundary of Ancient Woodland. Part of the site (FW2b) was subject to a dismissed appeal for 8 dwellings (APP/U1430/W/20/3265770), finding the development would suburbanise the area,

create ribbon development, erode the visual break, and harm views to woodland. Additional planting would not mitigate this. (High Weald AONB Unit)
The proposal for a new community facility and retail unit lacks clear evidence of need or viability. A recently built village hall and retail space already exist nearby at Coner Farm Close, with the retail unit struggling to remain occupied, while this site accommodates viable businesses, including the Weald Smokery and a plant nursery. Redevelopment of the latter would conflict with policies supporting horticultural uses – as per Management Plan objective LBE1. (High Weald AONB Unit)
The fields in FW2b link Sunnybank Cottages (former cottages for Bedgebury Forest workers dating to the 1850s) with the forest itself.
The site is available and that suitable access has previously been demonstrated. (LO of part of FW2b)
Wider allocation is supported, although FW2b could be delivered independently and would not be hampered by access issues onto the A21. (LO of Cherry Tree Nursery)
FW3
National policy supports rural employment development in appropriate locations. FW3 aligns with this by enabling small-scale, landscape-sensitive growth on previously developed agricultural land. Required ecological safeguards, including woodland buffers and protection of key features, ensure environmental impacts are minimised.
Building heights should remain low to protect the landscape and avoid overbearing impacts.
Heavy industrial uses should be excluded because of noise, traffic and environmental impacts. Controls required on lighting, noise and operating hours to protect the surrounding area.

How the main issues have been considered

FW1 - Land rear of Fruitfields, High Street, Flimwell

- Dwelling number reduced from 32 to 27
- Policy wording added to ensure the localised surface water drainage of the area is accounted for
- Policy wording added to ensure active travel routes are connected to existing routes of travel and highlighting that bus service contributions will be required
- Policy wording added to reflect the access requirements of the site
- Policy wording added to ensure ACIB and adjacent APIB are considered in the scheme design

FW2a (now FW2) – Land south of Hawkhurst Road, Flimwell

- Site reduced from 3.25ha to 0.87ha, dwelling number reduced from 44 to 0 and employment floorspace increased from 1,650sqm to 1,800sqm

- Policy wording amended to accurately reflect the site due to the reduction in size and development capacity
- Policy wording added to ensure ACIB is considered in the scheme design
- Policy wording added to highlight the need for early engagement with National Highways on the connection and location of the site in relation to the A21
- Policy wording added to ensure pedestrian access is connected to existing and proposed routes of travel

FW2b (now FW3) – Land north of Hawkhurst Road, Flimwell

- Site reduced from 3ha to 2.19ha, dwellings number reduced from 70 to 35 and mixed-use elements removed and policy wording amended to highlight the character of the site and measures needed to mitigate any impact of development
- Policy wording amended to accurately reflect the site due to the reduction in size and development capacity
- Policy wording added to ensure ACIB and adjacent APIB is considered in the scheme design
- Policy wording amended to reflect potential phasing requirement due to network capacity
- Policy wording added to highlight the need for early engagement with National Highways on the connection and location of the site in relation to the A21
- Policy wording added to ensure active travel routes are connected to existing and proposed routes of travel and highlighting that bus service contributions will be required

FW3 (now FW4) - Land at Cedar Farm, London Road

- Employment floorspace has increased from 1,500sqm to 2,400sqm
- Policy wording amended to highlight the character of the site and measures needed to mitigate any impact of development
- Policy wording added to highlight the need for early engagement with National Highways on the connection and location of the site in relation to the A21
- Policy wording added to ensure ACIB and APIB are considered in the scheme design

Question 60

Do you have any comments on the proposed site allocations in Ticehurst, detailed in Policies TC1 and TC2?

Number of respondents: 26 / Number of comments: 28

Main issues raised

Infrastructure is not adequate enough in the village. School too small, GP Surgery planning to close. There are currently outages on water.
Concern for increased traffic. Traffic queuing to turn right into Steellands Rise will back up on dangerous B2087 blind bend.
Additional site-specific comments
TC1
Southern Water's initial checks indicate that site TC1 may have limited local network capacity, and phasing of development may therefore be needed alongside network reinforcement prior to occupation of the total number of dwellings indicated in each policy. Southern Water infrastructure also crosses site TC1 and may require easements or diversion. Please also include the following wording: "Layout of the development must be planned to ensure future access to existing sewerage infrastructure for maintenance and upsizing purposes". (Southern Water)
Major development in the National Landscape. Site would be highly uncharacteristic of the village and its morphology, especially the north part which would extend into undeveloped countryside, significantly urbanising the rural setting of the village to the south - contrary to objectives S1, FH2 and PQ2 of the High Weald Management Plan. Enclosure from the wider High Weald landscape is typical of its small-scale, field-pattern character. Historic boundaries define this site, and limited visibility does not justify major development or reduce potential harm to natural beauty. The High Weald Design Guide also states that new screening should not be used to justify poorly located development. There may be potential to look for more limited development on the southern field only. (High Weald AONB Unit)
Steellands Rise - bus stop upgrades (RTPI) and service contributions are likely to be sought. Query the criteria to link towards Tinkers Lane as the land does not connect up to it. (ESCC)
Propose instead 10 dwellings in southern site and 25 dwellings in northern site. Ticehurst PC would want to keep the two fields separate, with market low level housing on the southern site and then mixed market and affordable on the larger site to the north. Provide a pedestrianised route to Tinkers Lane (an aim contained within Ticehurst Neighbourhood Plan) and the owner confirmed that a more user-friendly path should lie to the south of the fields and starting by Coronation Cottages. (Ticehurst Parish Council)
A reduction in density, with greater provision of green space and lower-rise development, would better reflect the character of the area and site constraints.
Policy wording should be amended to ensure that a number of considerations remain indicative in policy, and to be determined at planning applications stage, including: - Housing numbers should be indicative, and not set as a limit. - Layout, Green Infrastructure and design (including low-rise reference) to be informed by application stage masterplanning. - Caveat that connection towards Tinkers Lane is subject to land availability and landowner agreement. - Tenure, mix, and delivery mechanism. (Landowner of site)
TC2

TC2 is considerably smaller in scale and, in my view, represents a more proportionate and acceptable level of development for the area
Concern regarding the density of the allocation.
Western area is at risk of flooding and Southern Water are currently looking at the area as raw sewerage is spilling into the area when there is heavy rain fall. (Ticehurst Parish Council)
Adjacent ancient woodland and root protections areas require consideration.

How the main issues have been considered

TC1 - Land north of Hawkhurst Road, Flimwell

- Dwelling number reduced from 54 to 42 and policy wording amended to highlight the character of the site and measures needed to mitigate any impact of development
- Policy wording amended to reflect to sewerage infrastructure and overhead electricity cables
- Policy wording added to ensure active travel routes are connected to existing routes of travel and highlighting that bus service contributions will be required

TC2 - Orchard House, Ticehurst Village

- Policy wording amended to highlight the character of the site and measures needed to mitigate any impact of development
- Policy wording added to reflect the access requirements of the site
- Policy wording added to ensure adjacent ACIB is considered in the scheme design
- Policy wording added to reflect the recommendations relating to flood risk set out in the Level 2 SFRA

Question 61

Do you have any comments on proposed Policy TC3: Bewl Water

Number of respondents: 26 / Number of comments: 28

Main issues raised

The North Western bank is in Wealden DC where there is pressure for change of use of publicly funded buildings for sports group clubs to convert to residential overnight accommodation. There needs to be a joint policy with Wealden specific to Bewl Water. Policy should also be strengthened to include:

1. No residential or Holiday style accommodation should be permitted close to or within the boundary fence of the Bewl Estate.
2. No motorized watersports boats allowed.

3. Encourage the use by current existing users, sailing, rowing, canoeing, fishing from bank and boat, paddle boarding, subaqua Diving, or other promoting secure leaseholds.
4. The Round Water Walk on both Public and Permitted Bridlepaths and footpaths to be enhanced to be upgraded for all year use.
5. Support the establishment of a Special Protection Area (SPA) designation of Bewl. Currently being assessed by DEFRA and Natural England.
This policy is strongly supported. (ESCC)
TWBC strongly supports this policy and its criteria for development allowed at Bewl Water. (Tunbridge Wells BC)
We question the necessity for this as a standalone policy given that all limbs of the policy are supported by other composite parts of the draft Local Plan with some, but not all, specifically cross-referenced within the policy wording itself. We consider that this constitutes an unnecessary duplication of policy within the plan. (Wealden DC)
Strengthen policy so that it: - Prohibits overnight tourist accommodation – associated nighttime noise risks significant harm to wildlife specific to Bewl. To this end, the policy must imbed Dark Skies and Tranquillity protections, with some of the darkest skies in the High Weald. - Safeguards watersports, community facilities and access, that are compatible with conservation. - Ensures cross boundary consistency with Wealden.
There is no security of tenure for the watersports facilities at Bewl Water. Requires watersports strategy in Local Plan. Bewl is one of the very few locations where people with disabilities who need adaptable boats and appropriate access to both the water and land-based facilities can participate in watersports on an equal basis. Plan should include a daytime watersports strategy, including sailing, rowing and canoeing, this could: • Ensure that access to watersports is as safe, easy and inclusive as possible • Enhance the physical and mental health and wellbeing of local communities • Enhance the education and skills offer of Rother District Council • Encourage daytime tourism • Provide positive experiences for children and young people (Bewl Sailing Association)

How the main issues have been considered

- This Policy has been updated and moved to the Environment chapter of the Plan, renamed Policy ENV12.

Question 62

Do you have any comments on the proposed site allocations in Stonegate, Ticehurst parish, detailed in Policies SG1 and SG2?

Number of respondents: 26 / Number of comments: 28

Main issues raised

Stonegate currently lacks adequate pedestrian infrastructure making it unsafe or impractical to walk to the primary school and railway station (1.2km away). Further development in the village would require a safe pedestrian crossing at the junction of Bardown Road/Lymden Lane/Station Road/Cottenden Road and the provision of a footway from the railway station to join the existing footway on Station Road (by the church).
The village is unsustainable for more development, is remote, and would necessitate more cars on unsuitable roads.
Southern Water has identified no potential capacity constraints for these sites at this Local Plan stage, however early engagement with Southern Water nearer the time of development is encouraged. (Southern Water)
There are further serious concerns regarding water and drainage infrastructure. South East Water states that properties should have a minimum pressure of 1 bar; nearby Limden Close already records only 1.2 bar. Following repeated water main failures, the system is fragile.
Additional site-specific comments
SG1
Southern Water infrastructure crosses site SC1 and may require easements or diversion. Please include the following wording: "Layout of the development must be planned to ensure future access to existing sewerage infrastructure for maintenance and upsizing purposes". (Southern Water)
Lymden Lane is very narrow, especially at site's location, with inadequate site lines.
5 terraced cottages would be too many, with at least one car per cottage, or likely two in this rural area, and inadequate parking space.
No objection in principle subject to the other general site-specific comments on our representations letter being addressed. (High Weald AONB Unit)
Site is available and would be delivered with 5 years. (LO of site)
The thick red line outlining the site SG1 inaccurately includes the access to a small holding, and should not form part of the site.
This site is constrained by Bardown Road and the available extent of highway to deliver appropriate footway links to the south to Station Road or crossing points to reach the existing footway network. Unless there is acquisition of 3 rd party land, the site cannot provide suitable access provision to reach the school we would request that this matter is explored further should the Council be minded to take the site forward to its Regulation 19 plan. Public transport is limited apart from Flexibus whose provision is subject to funding being available. (ESCC)
The site and its surroundings provides habitat for a diverse range of wildlife, including kestrels, owls, buzzards, Red Kite, Gold Crest and butterflies such as Skipper, Comma, Painted Lady, as well as slow worms.
The ACIB maps show sandstone outcrops within/close to this allocation. Protection of such features should be a requirement. (ESCC)
Development would overlook and dominate nearby homes, particularly those in The Acorns. Significant height differences (approx. 3.5m) mean new buildings could look directly into private gardens.
Site is on prominent high ground. The Local Plan does not properly account for steep level changes on the southern boundary. And the suggested development

areas are on the highest and most visually sensitive parts of the site. Would be visible from long views to the west, including any necessary lighting impacting on dark skies.
Higher densities (35 dph) are normally justified in well-connected village centres, which this site is not.
Development threatens the water supply to a historic pond within the Acorns fed by underground springs from the site. Construction and drainage would likely disrupt subsurface water flows and lower the water table.
Presence of overhead high-voltage power lines.
No objection in principle subject to the other general site-specific comments on our reps letter being addressed. Landscape Sensitivity work prior to allocation will need to consider the appropriate access location into the site to minimise impacts on the HWNL. (High Weald AONB Unit)
Our Transport Technical Note demonstrates that sufficient visibility can be achieved onto Bardown Road within land under the control of the applicant and the Local Highway Authority. Recommended wording: "Access should be provided at the SE corner of the site, with a new footway on the southern side of the vehicular access terminating at the junction with The Acorns.." Design and affordable housing requirements should be flexible. (LO submission)

How the main issues have been considered

SG1 - Land at Lymden Lane, Stonegate

- Policy wording added to reflect pedestrian safety requirements of the site
- Policy wording amended to reflect to sewerage infrastructure

SG2 - Land east of Bardown Road, Stonegate

- Policy wording amended to highlight the character of the site and measures needed to mitigate any impact of development
- Policy wording amended to reflect to sewerage infrastructure and overhead electricity cables
- Policy wording added to ensure the localised surface water drainage of the area is accounted for
- Policy wording added to ensure adjacent APIB is considered in the scheme design
- Policy wording added to reflect the access and pedestrian safety requirements of the site
- Policy wording added to reflect the options for improvement of pedestrian access to and from the site

Question 63

Do you have any comments on the proposed site allocations in Robertsbridge, detailed in Policies RB1 to RB6b?

Number of respondents: 26 / Number of comments: 28

Main issues raised

See site-specific issues.

Additional site-specific comments**Etchingham**

The fields adjacent to the school.

Land behind Ladyfield. Six houses. Included in the draft Neighbourhood plan. This is not a site that is visually intrusive on the AONB, more particularly the Rother Valley and the furthest property would be no further from the High Street than those in Oaks Close. While the access is closer to Oxenbridge Lane on the south side of the High Street than is really desirable, the traffic is already slowing radically and access for a relatively small number of vehicular movements would seem achievable. Further assessment of the site is warranted.

The Lambing Shed. At least 6 starter homes. Already in the draft Neighbourhood Plan. This is a brownfield site and the Council fails to understand why it has been ruled out. It is possible that there has been some misinformation about the location of ancient woodland. The track accessing the site is already in use as an access and while the architect's suggestion of ten may be excessive, at least half a dozen small properties would help meet one of the village's principal needs. Sight lines at the access would need attention.

The old school building located just outside the village (which has been unused for several years) together with a small car parking area.

There is also an additional area in the centre of the village at the junction of Church Lane and the High Street - This area is severely overgrown through neglect and could easily be repurposed for housing.

Hurst Green

Land at Cooks Field has been independently assessed through application, appeal and neighbourhood plan processes and found suitable, achievable and sustainably located for at least seven dwellings. Refusal at appeal related solely to a technical S106 matter, not landscape or site suitability. (LO representation)

Immediately adjacent to Land at Cooks Field, the site shares comparable sustainability credentials, is less visually exposed, and offers further housing potential within a landscape-led scheme. Both sites represent suitable and available opportunities to contribute to housing delivery and should be allocated. (LO representation)

Robertsbridge

Station Road, Robertsbridge TN32 5DG is a suitable brownfield site for around 12 homes, with existing access and no flood risk. Given surplus employment land in Rother, it should be identified for future housing. (LO representation)

Land north of Knelle Road, Robertsbridge (Site Reference SAL0025 and SAL0047) should be allocated. The site would be in clear alignment with the planned pattern of growth for Rother. The submitted Landscape and Visual Appraisal demonstrates that landscape-led

development could be accommodated on the site without unacceptable impacts on local landscape character and the wider High Weald National Landscape. The site is sustainably located (as acknowledged by the SA which would facilitate travel via alternative means of transport than the private car. (LO representation
Staplecross
EWH0018 in addition to EWH0009: The site is strongly enclosed to the north by Watt's Wood and Bowling Alley Wood, which would form a new defined settlement edge/boundary and the wider landscape to the northeast. Footways within the site would create connections from the village hall to PRofW EWH24 and the wider countryside. The site would comfortably provide 40 dwellings. (Landowner representation)
Flimwell
In preference to FW2a, it would be better to allocate land to the south of Royal Oak Garage, which is less green field land, while access could use the existing logistics roads / entrance
Site TIC0039 represents a small and contained extension to the existing settlement at Bewl Bridge Close, forming a logical rounding off of the village edge rather than an intrusion into open countryside. The revised proposal relates to a significantly reduced developable area and a modest scheme of approximately six dwellings, materially reducing any landscape or environmental impact previously associated with the wider landholding. When assessed against national planning policy and the Local Plan's obligation to identify the most appropriate and deliverable sites, the rejection of TIC0039 cannot reasonably be justified. (LO representation)

How the main issues have been considered

- HELAA updated to take account of latest information on sites that are suitable, available, and achievable.

Question 64
Do you have any comments on the proposed site allocations for Gypsies, Travellers and Travelling Showpeople, detailed in Policies GYP1 to GYP6?
Number of respondents: 31 / Number of comments: 34
Main issues raised
It is essential that any new allocations or changes to existing sites continue to consider supporting infrastructure, particularly Primary Care provision, to ensure that healthcare services can accommodate additional patients (NHS Sussex).
Southern Water's initial checks indicate that some of the GYP sites are proposed within 500m of operational wastewater treatment works. We therefore request Rother consult us on planning applications for all sites so that we can share the results of more detailed checks with the authority. Specific wording is recommended (Southern Water).
Sites seem to have more freedom in terms of planning than what would normally be allowed. All communities should abide by the same rules and regulations.

There are sufficient sites already in Battle including sites subject to outstanding planning applications. No additional sites are needed in Battle.
The policy should include the requirement that the sites should not be on protected landscapes.
Additional site-specific comments
GYP1 - Land adjacent to High Views, Loose Farm Lane, Battle
Existing site with adequate road access.
Harmful to highway safety.
Harmful to residential amenity of adjoining occupiers.
GYP2 - Land south of Hastings Road, Battle
There needs to be consideration of a shared (GYP1 & GYP2) day-room structure, beside pitch numbers proposed.
Increasing the size of this existing site would impact residential amenity of adjoining occupiers, as the travellers use the site for commercial purposes including burning of wood, contrary to the planning permission.
Existing floodlights on all night harm residential amenity and cause light pollution.
Harmful to highway safety.
GYP3 - Land on the east side of Kingwood Hill, Cackle Street, Brede
The site only has temporary permission based on the particular needs of the occupiers and should not be permitted on a permanent basis.
Harmful to the High Weald National Landscape.
Causes nuisance to local residents.
Causes harm to local wildlife.
GYP4 - Land adjacent to Fir Tree Cottage, Netherfield Hill, Battle
GYP4 lies within the Brightling Gypsum Mine/ Robertsbridge Gypsum Works Minerals Consultation Area (MCA) as identified by the East Sussex, South Downs and Brighton & Hove Waste and Minerals Sites Plan (2017). Proposals for non-minerals development that would sterilise or prejudice the extraction of the mineral resource or result in incompatible development should not be permitted. It is therefore advised that the text to this policy includes reference to the requirement to consult the Minerals Planning Authority and the mine operator to determine whether the proposed development at this site would be incompatible (East Sussex County Council – Waste and Minerals).
The allocation represents a direct contradiction of national and local planning protections regarding the High Weald National Landscape (AONB). The Council acknowledges the site has a harmful landscape impact. The most recent planning permission stated that the residential use of the site is not considered suitable on a permanent basis in this location due to the harm it causes to the landscape and scenic beauty of the High Weald National Landscape. Less harmful alternatives outside the HWNL have not been explored.
The site is in an unsustainable location.
Harmful to highway safety due to poor visibility.
Adjacent to ancient woodland.
The site only has temporary permission based on the particular needs of the occupiers and should not be permitted on a permanent basis. Permitting it on a

permanent basis sets a precedent that people can purchase plots and commence development without planning permission.
Permanent status would set a precedent for further development of land on Netherfield Hill.
GYP5 - Land south of Redlands Lane, Salehurst
The proposal to extend the existing Gypsy and Traveller Site on Redlands Lane from 6 to 10 units in part regularises the fact that there are already 8 units on site, 10 units is the maximum we would support. It would be practical to offer the additional units to members of the family who already live on site, and to provide access to the site through the existing site entrance. We do not support a new second access point onto the narrow country lane, as the wording in the RDLP seems to suggest (Salehurst and Robertsbridge Parish Council)
The site will result in pressure on infrastructure in Robertsbridge.
GYP6 - Land adjacent to Valentine Ridge, A2100, Mountfield
The site is within 500 metres of Robertsbridge Wastewater Treatment Works. Southern Water should be consulted on any planning application. The following additional wording should be added: "The layout of 'sensitive residences' for any site allocation within 500m of an operational wastewater treatment works should be informed by an odour assessment to be undertaken in consultation with statutory wastewater operator for the works" (Southern Water).
GYP6 lies within the Mineral Safeguarding Area (MSA) for the Brightling Gypsum Mine as identified by the East Sussex, South Downs and Brighton & Hove Waste and Minerals Sites Plan (2017). Proposals for non-minerals development that would sterilise or prejudice the extraction of the mineral resource or result in incompatible development should not be permitted. It is therefore advised that the text to this policy includes reference to the requirement to consult the Minerals Planning Authority and the mine operator to determine whether the proposed development at this site would be incompatible (East Sussex County Council – Waste and Minerals).
Mountfield Parish Council object to the extension of the traveller site at Valentine Ridge (Policy GYP6). We consider it over-development and there will be a severe lack of services.

How the main issues have been considered

- Minor amendments and additions to policy criteria and supporting text
- Policy GP3 (Kingwood Hill, Cackle Street) deleted because this site now has full planning permission and is occupied.

Question 65

Do you consider that there are any other possible sites for Gypsy, Traveller or Travelling Showpeople sites which should be allocated in the Local Plan?

Number of respondents: 7 / Number of comments: 7

Main issues raised

Traveller sites should be provided by the Council and managed by the Council to ensure proper sewage, waste disposal and amenities.

There are no suitable sites in Rother.

How the main issues have been considered

- Comments noted. There is one County-Council run site in the district. Other sites are privately owned.

Other matters

Question 66

Do you have any comments on the proposed changes to Policy LWL7 (A) (i) (Streets for All)?

Number of respondents: 19 / Number of comments: 19

Main issues raised

General support for the “Streets for All” approach, including support from some respondents for 20mph design principles. A number of respondents support the policy in principle, including the use of 20mph design speeds to promote safer, healthier and more sustainable communities. (Battle Town Council; Rye Neighbourhood Plan Steering Group; Rye Town Council; NHS Sussex)

Street design requirements should remain flexible and responsive to site-specific constraints. While supporting the aims of the policy, it is emphasised that its wording should allow for flexibility so that development proposals can respond appropriately to site-specific constraints and opportunities through good design. (Wates Developments)

Policy should enable deliverable site access and layout solutions. Support for the policy is linked to ensuring that site-specific access arrangements and layout design, including vehicular access, can be delivered in a way that achieves the objectives of “Streets for All”. (Exeter College)

Applicability of the “Streets for All” approach in rural areas is questioned. Some respondents raise concerns that in rural areas, where services and amenities are not locally available, designing streets primarily around walking and cycling may be unrealistic and could lead to poorer design outcomes and increased reliance on private vehicles.

Mixed views on the effectiveness and enforceability of 20mph measures. It is noted that there are differing views on the effectiveness of 20mph limits in practice, including concerns about compliance and enforcement. (Burwash: Save Our Fields – noting differing views without taking a formal position)

How the main issues have been considered

- Policy LWL7 Streets and Public Realm for All reviewed and updated

Question 67

Do you have any comments on the Appendices?

Number of respondents: 29 / Number of comments: 32

Appendix 2 – The glossary should be removed. Many of the entries are taken from the NPPF. Where the entry is different from the NPPF one must ignore the glossary and use the NPPF definition. As the Local Plan ages, more and more of the entries will be wrong, because statutory or NPPF or other central government documents have amended the definition. It is inevitable the glossary will already be wrong before it is published. A definition for ‘Older people’ is so wide it could give no assistance to anybody
Appendix 2 - The appropriate way of dealing with definitions is to have a definitions document for all of Rother District Council. The Draft Local Plan would refer the reader to that document. Where an entry has been taken from central government, like a statute or the NPPF, it should give its source.
Appendix 2 - “Urban, Suburban and Rural” and “Green and Blue Infrastructure” should be defined
Appendix 3 - Object with the elimination of option SD09, which worthy of further investigation on a case-by-case basis.
Appendix 3 -0 Development Options: SD01- Agree Rye Cluster; SD04- Disagree: this is “urban creep” which development boundaries are set to deter; SD06: Agree; all development sites in Rye are Brownfield; SD08: Agree that this arbitrary division is rejected.; SD09: Agree any development must take account of constraints; SD011: Agree subject to constraints; SDO12: Agree; SDO14: Strategic gaps are designed to deter development to avoid coalescence, to protect biodiversity and avoid flood risk land. They should be retained.
Appendix 3 - Disagree with SD04 and SD013, specifically as they relate to Robertsbridge. They would create urban sprawl into the AONB
Appendix 3 - The removal of Policy SDO9 could enable rapid expansion in smaller settlements.

How the main issues have been considered

- Development Strategy options reviewed and assessed through the latest Interim Sustainability Appraisal, with final proposed development strategy set out in amended Policy SS1: Spatial Strategy for Rother; however this largely retains the strategy set out in the draft Local Plan 2026.
- Glossary reviewed and updated for consistency with the NPPF and to ensure clarity over locally defined terms

Question 68

Do you have any comments on the Interim Sustainability Appraisal in support of the Regulation 18 stage consultation on the Development Strategy and Site Allocations (January 2026)?

Number of respondents: 23 / Number of comments: 32

Main issues raised

Notes areas identified in SA as risk at flooding, and therefore objects to development being proposed within them.

Disagreement with findings of SA on flood risk in local areas – suggests the findings do not accord with flood incidences experienced, and that evidence is insufficient. Comment that the SA underestimates flood risk.
The options tested do not explore reasonable alternatives that would materially increase overall supply, focusing mainly on density scenarios rather than additional site allocations. Even the highest-density option would not meet Local Housing Need. The Appraisal does not clearly explain how its evaluation informed the preferred strategy, and it remains unclear whether the Plan has gone as far as possible to meet housing needs sustainably (planning agent).
The Interim SA for is high-level and incomplete, with many “neutral/unknown” scores due to its policy-off approach. The SA has not yet applied mitigation that will form part of BT2, such as outcomes from ongoing hydro-ecological monitoring, which is expected to improve biodiversity scoring (planning agent)
The HELAA appears to be the main basis for selecting or rejecting sites, without a more detailed SA assessment of the sites sustainability to influence those outcomes. For instance, the SA does not provide a summary of the issues for the rejected sites. In addition, several of the sites which have been rejected for development have similar sustainability credentials and outcomes within the SA as to those sites that have been selected for proposed allocation. A greater understanding and explanation of how the SA process has been used to influence the outcome of the suitability of sites is particularly important, especially in relation to rejected larger strategic sites that have been promoted by landowners and appear as available for development. (Wealden District Council)
The Interim Sustainability Appraisal provides a high-level, “policy-off” assessment that risks prematurely discounting suitable sites given the scale of housing need. Several scoring criteria too heavily penalise sites for constraints that can be addressed through design, such as adjacency to Ancient Woodland, surface-water flood risk, distance from open space, and location within the High Weald National Landscape. The methodology should allow for mitigation, site-specific context and landscape-led design, including the ability to provide buffers, SuDS and public open space. Without refinement, the SA may undervalue deliverable sites capable of contributing positively to housing supply. (planning agents)
Question whether the methodology employed in SA for selecting sites is adequate. Comments including - Ancient Woodland / Priority Habitat (SA 2b, 2d): Adjacent sites are automatically penalised despite potential to retain and buffer habitats in line with Natural England guidance; Flood Risk (SA 5b): “Significant adverse” scores do not account for avoidance and drainage mitigation through detailed design. Open Space (SA 7b): Sites capable of providing on-site open space are still scored negatively; National Landscape (SA 15a): All sites within the High Weald receive a “significant adverse” score without distinction between exposed and settlement-edge locations. (planning agent)
The Appraisal assesses the three parcels within draft policy BX28 collectively rather than individually, despite the HELAA identifying their distinct characteristics and delivery potential. This risks obscuring the standalone merits and early deliverability of Northeye. The Sustainability Appraisal should therefore be updated to assess each parcel separately to ensure the Plan is evidence-based, effective and sound. (Homes England)

The SA should clarify whether the development around Bexhill will work towards or set the framework for the sustainable transport corridor coming forward in the future, or at least not hinder its potential. (TWBC)
It is noted that the SA does not confirm what each indicator refers to (for example, how it relates to the assessment questions outlined in the appendix), therefore it is not possible to provide detailed comments on the assessment's assessments. (planning agent)

How the main issues have been considered

- As part of the iterative SA process, the Regulation 19 Local Plan (including the Development Strategy and site allocations) has been subject to a further Sustainability Appraisal. The methodology for the appraisal is set out in the report and is considered by the Council to be proportionate and in line with the legislative requirements and national planning guidance.
- The Regulation 19 SA also includes consideration of cumulative effects of the plan, with the sites considered along side other Local Plan policies and other plans, policies, and programmes.

Question 69
Are there any other issues, options or other matters you would like to raise?
Number of respondents: 54 / Number of comments: 74 (note: those relating to other question numbers were moved to the more relevant question number)
Main issues raised
Rye Neighbourhood Plan currently subject to review – seeking guidance on preparing the NP in line with the emerging Local Plan.
It is important that the Local Plan explicitly recognises the need for investment in new build medical facilities to support growth in all areas. (NHS Sussex)
Provision to equestrian riders is not listed in plan. Rother has a high density of horses and it is responsible for good economic rural growth and employment. RDC surely could include reviewing bridleway access points as new roads/ housing /business development may well increase the difficulty for riders to access safe hacking. Many equestrians in region moved to this area for better access and will relocate again if RDC don't make provision for safety.
Figures 10 and 12 Maple Walk is designated as a cycle route with a reference to the ESCC Local Walking and Cycling Infrastructure Plan 2020 (LWCIP). The LWCIP itself references a study by Sustrans dated June 2018. For the avoidance of doubt it is confirmed that the RAs were not consulted about either the LWCIP or the Sustrans study. RDC must remove from all Local Plan documentation (including texts, maps and Figures) all reference to Private Maple Walk being a designated cycle route.
Objection - The plans for both Swallow Barn and White House Farm should be removed from any plan, potential plan or any assessment immediate; various reasons provided.
Timeframe for public exhibitions on draft Local Plan during consultation is too limited.

How the main issues have been considered

- A new policy of Neighbourhood Plans and Parish Priority Statements has been included in the Local Plan to provide clarity about the role of these documents in supporting the delivery of the Spatial Strategy for Rother
- As the Rye Neighbourhood Plan is at an advanced stage, the allocations within the plan have been deleted from the Local Plan. For the remaining Neighbourhood Plans, the site allocations have been included.
- The Council considers that the second Regulation 18 consultation was carried out in accordance with the adopted SCI and legislative requirements

Appendix A: Consultation material

This Appendix provides copies and samples of the consultation materials used to support the Regulation 18 consultation on the Draft Rother Local Plan 2026.