

Rother District Local Plan 2025 – 2042

Development Boundaries Background Paper

Regulation 19 Version – October 2026

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1. Introduction and Policy

Background

- 1.1 The National Planning Policy Framework (NPPF) (2024) requires Local Plans to set out an overall strategy for development while making sufficient provision for the conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.
- 1.2 The NPPF (2026) confirms that in setting a spatial strategy, development proposals within settlements should be approved while only certain forms of development are suitable outside of settlements.
- 1.3 A key component of Rother's adopted Local Plan spatial strategy is the use of Development Boundaries to distinguish between land within settlements, where, subject to other policies in the plan, development is generally supported in principle; and land outside settlements, that is treated as countryside for planning purposes, where only limited forms of development are appropriate. These boundaries are strategically important in directing growth to sustainable locations, particularly within a predominantly rural district characterised by extensive areas of countryside.
- 1.4 Development Boundaries also provide a clear distinction between settlements capable of accommodating growth and smaller hamlets which, by reason of their limited scale, function, sustainability credentials and/or landscape sensitivity, are not considered suitable locations for significant development and are therefore treated as part of the countryside. This distinction is particularly important in Rother, 83% of which is within the High Weald National Landscape and is characterised by a dispersed settlement pattern comprising numerous small hamlets and farmsteads together with larger villages and small market towns.
- 1.5 While Development Boundaries generally follow physical boundaries of a settlement, there may be fringe areas of settlements that are excluded in order to maintain the overall rural character of the locality. While they will normally follow physical boundaries, on occasion, the full depth of property curtilages may be excluded to make clear a policy statement that back-land or in-depth development is unacceptable, often because of its additional visual or amenity impact.

- 1.6 In addition, parts of the district are subject to significant environmental constraints, including the presence of Flood Zone 3, the Coastal Change Management Area affecting the coast, and wildlife designations, including SSSIs, SACs, SPAs and Ramsar sites. Development Boundaries can therefore serve not only to distinguish between settlements and countryside, but also to exclude constrained land within settlements where most forms of development would be inappropriate.
- 1.7 Given the predominantly rural character of the district and the extent of its countryside, Development Boundaries are an essential component of the spatial strategy, providing clarity and certainty as to where development is acceptable in principle and where restraint should be exercised in order to protect the character and function of the countryside. As part of the emerging Local Plan, it has been necessary to determine whether the existing Development Boundaries can still be justified.

2. Adopted Development Boundary policy

- 2.1 As the adopted Local Plan, the Core Strategy (2014) and the Development and Site Allocations (DaSA) Local Plan (2019) superseded the 2006 Local Plan. The principle of Development Boundaries is established through policy OSS2 in the Core Strategy (2014) which states:

“Development Boundaries around settlements will continue to differentiate between areas where most forms of new development would be acceptable and where they would not.”

- 2.2 Policy OSS2 also committed to the review of the Development Boundaries defined through the 2006 Local Plan through the subsequent DaSA, alongside site allocation policies. The reviewed Development Boundaries are designated through DaSA policy DIM2.

- 2.3 Two key evidence base documents were important to the Development Boundary review:

- The Rural Settlements Study (RSS) Background Paper (2008): This undertook a review of the scale and function of settlements within the district, to identify a preferred spatial distribution of development based upon service centres and to meet local needs.
- The Strategic Housing Land Availability Assessment (SHLAA) (2013): The SHLAA informed the distribution of development around the district through the identification and assessment of sites within the district for their potential suitability. While the SHLAA is not a policy document, it was ultimately a significant part of the evidence base that informed subsequent site allocations in the DaSA and Neighbourhood Plans.

- 2.4 Where Neighbourhood Plan areas produced their own policies, the Development Boundaries for settlements within those areas would be defined through the Neighbourhood Plans.

2.5 The settlements with adopted Development Boundaries, as designated through DaSA policy DIM2 are set out in Figure 1 below, which also sets out whether they were defined through the Local Plan or the relevant Neighbourhood Plan.

Figure 1: Settlements with adopted Development Boundaries and where they have been defined (DaSA, 2019)

Settlements with Development Boundaries in the Local Plan (DaSA)	Settlements with Development Boundaries in Neighbourhood Plans
Bexhill Hastings Fringes Beckley Four Oaks Brede and Cackle Street Broad Oak Camber Catsfield Guestling Green Fairlight Icklesham Iden Northiam Peasmarsh Pett Rye Harbour Staplecross Three Oaks Westfield Winchelsea	Battle Rye Burwash Burwash Common Burwash Weald Crowhurst Etchingham* Flimwell Hurst Green Netherfield Robertsbridge Sedlescombe Stonegate Ticehurst

** While Etchingham is within a designated Neighbourhood Plan area, there is no Neighbourhood Plan in place, and therefore the Development Boundary for Etchingham as defined in the 2006 Local plan remains extant.*

2.6 The DaSA (2019) also removed the Development Boundaries from Pett Level, Winchelsea Beach, Friar's Hill (part of Pett) and Norman's Bay due to a combination of environmental constraints and sustainability considerations. Norman's Bay, Pett Level and Winchelsea Beach were removed principally because of significant flood risk, with substantial parts of these settlements lying within Flood Zone 3, together with their proximity to internationally and nationally protected habitats, including Ramsar sites, SACs, SPAs and SSSIs. Pett Level was also identified as an unsustainable location due to its limited services, facilities and constrained accessibility. Friar's Hill, formerly part of Pett's Development Boundary, was removed because it is physically disconnected from the main village and was not considered a sustainable location for development.

- 2.7 These changes demonstrate that Development Boundaries have been used not only to direct growth to sustainable locations, but also to exclude settlements and areas where environmental constraints or sustainability concerns make them unsuitable locations for the focus of growth except for more limited forms of development.

3. The Settlement Study (2024)

- 3.1 The Settlement Study was prepared as a key evidence base document for the emerging Local Plan and reviewed the role, function and sustainability of settlements across the district from a fresh perspective. Rather than starting with existing development boundaries, the study extensively identified areas of built form across Rother and devised a scoring matrix composed of five key sustainability factors, comprising: access to essential services, overall service level, local employment opportunities, public transport accessibility and broadband connectivity.
- 3.2 The scores of these five sustainability factors were then added together to give each area of built form an overall 'Sustainability Score', which then provided a sustainability hierarchy where they were grouped as either Highly Sustainable, Sustainable, Moderately Sustainable, Potentially Sustainable, Low Sustainability or Not Sustainable. The results can be viewed in full in the [Settlement Study – Part 1 \(Figure 12\)](#).
- 3.3 Although the Settlement Study introduced a new sustainability scoring system, its findings were broadly consistent with the existing pattern of Development Boundaries, with the highest-scoring settlements generally already possessing one. Playden is the notable exception. Its proximity to Rye provides access to a wide range of services and facilities, resulting in a relatively high sustainability score. However, significant constraints mean that a Development Boundary was not considered appropriate. These constraints have been considered further through the emerging Local Plan and are discussed later in this Background Paper.
- 3.4 A further objective of the study was to identify broad opportunities for future growth. Through an assessment of physical, environmental, heritage and landscape constraints, the study considered land around settlements that may have capacity to accommodate development, and highlighted areas where growth could potentially occur with less harm to landscape character or environmental interests. These broad areas of search, together with the wider understanding of settlement form, function and constraints, were used to inform the Housing and Economic Land Availability Assessment (HELAA). In this respect, the Settlement Study acted not only as an assessment of settlement sustainability, but also as a proactive evidence base to identify locations where further site assessment could be undertaken through the HELAA process.

- 3.5 The findings of the Settlement Study are broadly consistent with the existing network of settlements with Development Boundaries and do not suggest that any existing Development Boundary should be removed. With the exception of Playden, no settlements currently without a Development Boundary were identified as being significantly more sustainable than those which already possess one. The study therefore supports the existing distribution of Development Boundaries across the district.

4. The Housing and Economic Land Availability Assessment

- 4.1 The HELAA forms another key component of the evidence base for the emerging Local Plan. The purpose of the HELAA is to identify land that may have potential for future housing, employment or mixed-use development and to assess sites against a range of planning, environmental, infrastructure and sustainability considerations, also considering their availability and achievability for development. While the HELAA does not itself allocate land for development, it provides an important evidence base for identifying sites that may be suitable for allocation through the Local Plan.
- 4.2 The HELAA assessed more than 900 sites, identified through a number of different sources, including: reassessment of sites previously considered through earlier land assessment exercises, sites submitted by landowners through the Council's "Call for Sites" (which has been running since 2020), and sites identified for assessment by Council officers, including through the Settlement Study where settlement constraints and opportunities were identified. The assessment of sites can be viewed within the HELAA itself. The HELAA therefore played an important role in reviewing both opportunities for growth and the appropriateness of existing Development Boundaries across the district, through the assessment of land both within and outside existing Boundaries.
- 4.3 Given the district's overall scale of housing need, the lack of available brownfield land and the fact that adopted development boundaries were tightly drawn around the built form of settlements, the majority of sites that have been assessed as potentially suitable, available and achievable through the HELAA, and subsequently proposed as site allocations through the emerging Local Plan, are located on the edges of existing settlements with Development Boundaries. This is particularly the case for the villages, and also Battle and Bexhill. This is consistent with the findings of the Settlement Study, where settlements scoring higher in terms of overall sustainability (and therefore being potentially suitable for additional growth) already had a Development Boundary in place.

5. Proposed Site Allocations in the Emerging Local Plan (Regulation 19 version)

- 5.1 Where proposed site allocations adjoin existing Development Boundaries, it is generally considered appropriate, through the emerging Local Plan, to extend the Development Boundary to incorporate the allocation site (or the developable portion thereof), while preventing harmful encroachment into rural areas.

Site allocations outside Development Boundaries

- 5.2 A small number of site allocations proposed on the edges of settlements, where there is a significant amount of green infrastructure or open space proposed within the site, are not fully incorporated within the relevant Development Boundary, but rather, it is proposed that the Development Boundary only includes the main developable portion of these sites. Examples of this include Policy EC2 (Croft Field, Etchingham) of the Regulation 19 Local Plan, which, while on the edge of a village, is sensitively located within the High Weald National Landscape and an area of wildflower meadow, meaning that the development boundary excludes that part of the site furthest from the village edge to ensure this part of the site would contain green infrastructure only. Similarly, the development boundary excludes part of the land subject to Policy BW1 (Land north of Shrub Lane, Burwash) which is unsuitable for built development due to environmental constraints including the presence of woodland.
- 5.3 Another category of site that have not been incorporated within Development Boundaries are rural employment sites that do not adjoin a settlement. National policy recognises that some flexibility is required in rural areas and that employment sites may have to be found beyond existing settlements to promote the vitality of rural communities. A list of proposed employment site allocations outside development boundaries is included at Appendix 1.
- 5.4 There are also a small number of sites that, while otherwise sustainably located, and suitable, available and achievable for development, do not adjoin an existing Development

Boundary, meaning that it would not be practicable or appropriate to include them within a Development Boundary. Some of these are detailed further below.

- Policy BT2: Land at Breadsell, Battle - 145 dwellings

5.5 The site is within the Strategic Gap between Crowhurst, Battle and Hastings and just outside the High Weald NL. The site is only considered suitable for development in the event that it comes forward with an adjoining, larger area of land within Hastings Borough, to form a strategic development comprising an urban extension to Hastings, whereby the benefits of the significant amount of additional housing could outweigh the landscape and potential environmental impacts of developing the site. Given these constraints, and specific circumstances, it would not be appropriate to incorporate this land within a Development Boundary because this could lead to alternative, inappropriate development that would not achieve the benefits sought through the allocation.

- Policy PL1: Land South of Corner House, Rye Road, Playden – 15 dwellings
- Policy PL2: Land between Saltcote and The Steps, New England Lane, Playden – 10 dwellings

5.6 Playden does not currently have a Development Boundary. However, the emerging Local Plan includes two residential site allocations within Playden.

5.7 Although Playden was identified by the Settlement Study as a relatively sustainable location and two sites have been allocated for development, this does not mean that a wider Development Boundary is justified. The settlement is highly constrained in heritage terms, with a Grade I listed church in a substantial setting, and a number of Grade II listed buildings. There are narrow winding lanes away from the single main road, which reduces the potential for suitable additional development. There are also landscape constraints, particularly in the northern section with regard to the setting of the High Weald NL, and potential land stability and ecological constraints on its southern edge. The suitability of the allocated sites reflects their specific characteristics and ability to accommodate modest levels of development subject to specific heritage and design requirements. Given the sensitivity of Playden's historic environment and settlement character, it was considered more appropriate to allocate specific sites than to define a Development Boundary that could suggest broader opportunities for development.

- Policy BWC1: Land south of Heathfield Road, Burwash Common – 7 dwellings

- Policy BWC2: Old Orchard Nursery, Heathfield Road, Burwash Common – 9 dwellings

5.8 Burwash Common already has a Development Boundary, although this is deliberately limited in extent and does not include all development associated with the settlement. This reflects the dispersed, rural character of the area and the landscape sensitivity of this ridge-top settlement, which is prominent in wider views. The emerging Local Plan allocates two sites on the western edge of Burwash Common, located approximately 150 metres beyond the existing Development Boundary. The suitability of these sites arises from their individual characteristics and ability to accommodate modest levels of development subject to the specific requirements of the allocation policies. However, the intervening land, or land surrounding the allocations, would not be appropriate for development, primarily for landscape reasons. For this reason, no extension to the Development Boundary is proposed.

- Policy FW3: Land north of Hawkhurst Road, Flimwell – 35 dwellings

5.9 A site is proposed for 35 dwellings to the east of the A21 at Flimwell. Although Flimwell has an existing Development Boundary, this relates only to the main settlement west of the A21, with the road forming a strong physical division. While the Settlement Study identified some landscape capacity for development north of Hawkhurst Road, the site is physically separated from the main built-up area and is therefore proposed as a limited, site-specific allocation. Consequently, it is not considered appropriate to extend the Development Boundary to incorporate the site.

6. Development Outside Development Boundaries

- 6.1 The designation of land outside Development Boundaries as countryside does not preclude all forms of development. While land outside development boundaries is regarded as ‘countryside’ for planning policy purposes, it does include some villages, hamlets and farmsteads, and may not necessarily represent the exact edge of settlements as such. The potential for appropriate development outside development boundaries to support vital rural communities, including through small-scale and specific housing growth, and also conserve or enhance the intrinsic qualities of the countryside, is recognised. A “Strategy for the Countryside” is proposed through the emerging Local Plan (Policy SS4) which sets out the types of development that will be supported.
- 6.2 Another way in which appropriate development in the countryside is reflected in the emerging Local Plan is through those site allocations which sit outside existing or proposed development boundaries, as detailed above. Furthermore, the emerging Local Plan contains a range of thematic policies which support limited forms of development outside Development Boundaries in appropriate circumstances. These include, for housing, Policy HOU3 (Rural Exception Sites and Community-led Development), Policy HOU7 (Specialist Housing for Older People) and Policy HOU11 (New Dwellings in the Countryside), which allow for specific forms of housing development where justified. Policy HOU11 in particular represents a slightly more permissive approach compared to the adopted Local Plan, in that it provides for an additional “exception” to allow for new housing in the countryside, as follows:

“Very small-scale development of single, pairs or small terraces of 3-4 dwellings (maximum), either within a settlement without a development boundary or adjacent to an existing development boundary...”

- 6.3 Such development is permitted through Policy HOU11 subject to specific criteria, as detailed in the policy, which have been informed by advice from the High Weald National Landscape Unit. The policy will therefore provide for additional, small-scale and appropriate levels of housing growth outside development boundaries, recognising that limited residential development in smaller settlements can help support local services and enhance or maintain the vitality of rural communities. In this manner, while the

Development Boundaries are retained as part of the Local Plan's spatial strategy, they do not unreasonably constrain housing growth, ensuring that Rother's strategy is a positive one.

- 6.4 The emerging Local Plan also supports appropriate economic development in the countryside and recognises the important role that rural businesses, tourism and land-based industries play in supporting the district's rural economy. Most explicitly, specific policies include Policy ECO7 (Tourism Activities, Facilities and Accommodation), Policy ECO8 (Holiday Sites and Accommodation), Policy ECO9 (Agricultural Development and Forestry) and Policy ECO10 (Agricultural Diversification).
- 6.5 The use of Development Boundaries does not prevent appropriate development from taking place outside settlements, but rather they can help to ensure that development in the countryside is assessed against policies specifically designed to address the particular circumstances, opportunities and constraints of rural locations.

7. Conclusions and Policy Recommendations

- 7.1 Development Boundaries remain an important and justified component of the emerging Local Plan spatial strategy. They provide a clear distinction between settlements and the countryside and assist in directing growth towards sustainable locations whilst protecting the character and function of the wider countryside. This is necessary for Rother, where a significant proportion of its residents live in rural settlements, and much of the district has significant landscape, environmental or heritage constraints, including the presence of the High Weald NL, internationally and nationally designated habitats sites, and the presence of Flood Zone 3 that affects a number of the district's coastal settlements.
- 7.2 The Settlement Study (2024) and HELAA (2026) have reviewed the district's settlements, assessed their sustainability and identified opportunities for growth. Together, these studies informed the identification of a number of suitable sites for allocation, most of which are located on the edges of existing settlements with Development Boundaries. The findings of the studies broadly support the existing network of Development Boundaries and do not provide evidence that any existing Development Boundaries should be removed. The evidence therefore supports the continued retention of all existing Development Boundaries, with amendments where appropriate to accommodate allocated development sites and reflect the spatial strategy of the emerging Local Plan.
- 7.3 Given that the majority of proposed site allocations are located on the edge of settlements with existing Development Boundaries, it is appropriate to amend Development Boundaries through the emerging Local Plan to incorporate those allocations that adjoin settlements and form logical additions to the built-up area. While a small number of site allocations are not proposed to be incorporated within Development Boundaries, these are justified by site-specific circumstances, and evidence which indicates that wider areas are not suitable for development in principle.
- 7.4 Consequently, no new Development Boundaries are recommended, while the emerging Local Plan includes a range of policies specifically intended to support appropriate forms of development outside Development Boundaries where a countryside location is justified.

Appendix 1: Rural employment site allocations that do not adjoin a settlement (Regulation 19 Plan)

Policy BT3: Beech Farm, Battle – 1,895 sqm of employment floorspace

Policy BT5: Rutherfords Business Park, Battle - 2,700 sqm of employment floorspace

Policy BRI1: Coldharbour Farm Estate, Brightling - 1861sqm of new employment floorspace

Policy FW2: Land south of Hawkhurst Road, Flimwell - 2,400 sqm of employment floorspace

Policy FW4: Land at Cedar Farm, London Road - 2,400 sqm of employment floorspace

Policy SD7: Marley Lane Business Park, Marley Lane - 2,400 sqm of employment floorspace

Policy SD8: Land at Felon's Field, Marley Lane – 3,000 sqm of employment floorspace

Policy WS4: Freshfields Farm, Westfield Lane, Westfield – 3,500 sqm of employment floorspace

