

Rother District Local Plan 2025 – 2042

Strategic Gaps 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
- 1.2 The NPPF (2026) confirms that in setting a spatial strategy, land that is protected or proposed to be enhanced should be identified. Designations and associated policies to safeguard gaps between settlements should be used only where they are necessary to maintain the separate identities of the settlements and their physical separation, and should be no larger than needed to achieve this aim.²
- 1.3 Part of the spatial strategy of Rother's adopted Local Plan, in line with national planning policy, is the identification of Strategic Gaps. These are regarded to be of strategic importance in terms of guiding the location of development. The objectives of the Strategic Gaps are:
- a. To maintain the separate identity and distinctiveness between settlements;
 - b. To maintain the strategic settlement pattern; and
 - c. To prevent the coalescence of settlements.
- 1.4 The Strategic Gaps in Rother were originally defined through the Local Plan (2006) and are currently defined through the Local Plan Core Strategy (2014) policies HF1 and RY1 and the Development and Site Allocations Local Plan (DaSA) (2019) policy DEN3. Within the adopted Local Plans, these strategic gaps can be grouped into three main geographic areas:
- a. The Bexhill, Crowhurst, Battle and St Leonards Strategic Gap;
 - b. The Fairlight and Hastings Strategic Gap; and

¹ NPPF (2024) paragraph 20.

² NPPF (2026) policy S2.

- c. The Rye/Rye Harbour Strategic Gap.

1.5 A review of these Strategic Gaps, primarily looking at the landscape perspective, took place in 2016 to support the production of the DaSA (see: [Strategic Gaps Background Paper, March 2016](#)). This included:

- a. An assessment of the landscape of each Strategic Gap to review:
 - i. The current quality, value and condition of the landscape;
 - ii. The sensitivity of the landscape to change and vulnerability to potential development pressure;
 - iii. Any areas of tranquillity that contribute to the landscape perception; and
 - iv. The effect of existing settlement distribution.
- b. A visual analysis of the Strategic Gaps to include:
 - i. An assessment of the visual characteristics of the urban edges;
 - ii. Views across the gaps;
 - iii. Identification of visually intrusive elements which detract from the perception of the rural gap; and
 - iv. Identify landscape features which contribute to the visual experience of the landscape.
- c. An analysis of the effectiveness of the physical and visual state of the current Strategic Gap boundaries. This included an analysis of where these boundaries could be altered to reinforce the perception of the gaps and secure defensible boundaries; and
- d. Guidelines for landscape management and enhancement which would strengthen the gap landscapes and reinforce their significance as protected landscape areas.

1.6 The 2016 review recommended some changes to the extent of the strategic gaps (as defined in the 2006 Local Plan), to ensure that all land necessary to meet the particular objectives was included and any land not meeting the particular objectives was not included. These changes were implemented through the DaSA (2019).

- 1.7 As part of the emerging Local Plan, it has been necessary to determine whether the Strategic Gaps can still be justified and whether there is any scope for changes to them, to accommodate development. This is of particular importance given the changes in national planning policy and the pressure on Councils to identify land, through their Local Plans, for delivering new homes.
- 1.8 The key mechanism for doing this has been through the Housing and Economic Land Availability Assessment (HELAA), which has been undertaken as part of the emerging Local Plan. The HELAA has assessed over 900 sites across the district, including some within the current Strategic Gaps. The assessment of these sites can be [viewed](#) within the HELAA itself.
- 1.9 The Interim Sustainability Appraisal Report (January 2026) and Sustainability Appraisal Report – Regulation 19 (Pre-submission) version (October 2026) have considered the principle of the strategic gaps. The principle has been assessed through the exploration of the development (spatial) strategy options – specifically option reference SDO14. The option was explored following Regulation 18 consultation feedback, where some respondents noted that given the extent of unmet housing needs in Rother, consideration should be given to development within the strategic gaps. The SA acknowledged that such an approach would score positively on SA objectives for housing, economic development and deprivation. However these were largely weighed against negative major negative impacts on SA objectives for landscape, and also other negative impacts for objectives on climate change and biodiversity, amongst others. Also, the SA concluded that the strategic approach for development within the green gaps would undermine their principal intent, including prevention of the coalescence of settlements. Therefore it recommended that development within the green gaps, at a strategic level, should not be progressed; whilst recognising that smaller windfall development could be appropriate on a case-by-case basis.
- 1.10 It is important to note, that Strategic Gaps do not need to be of a high landscape quality to serve their purpose but can still be of a local importance. Strategic Gaps also do not result in a blanket restriction on any development. Some forms of development may be considered acceptable as long as it meets the three core aims set out in paragraph 1.3. Strategic Gaps are also a different policy designation to Local Green Space, which is specifically defined in both the December 2024 NPPF

(paragraphs 106-108) and the August 2026 NPPF (Policy HC2). In Rother, these have been designated through the Neighbourhood Planning process.

2. The Bexhill, Crowhurst, Battle and St Leonards Strategic Gap

- 2.1 The Bexhill, Crowhurst, Battle and St Leonards Strategic Gap in practice forms one strategic gap but is actually comprised of three separate but contiguous elements reflecting the relationship of the three towns/villages in Rother against that of neighbouring St Leonards. The northern part of the Strategic Gap falls within the High Weald National Landscape.
- 2.2 A large part of this Strategic Gap comprises the Combe Valley Countryside Park (CVCP) which straddles the border between Rother district and Hastings borough. The aims of the Strategic Gap and CVCP dovetail in seeking to secure a large area of accessible open space which therefore maintains the distinctiveness of the surrounding settlements and prevents coalescence.
- 2.3 The Crowhurst Neighbourhood Plan (CNDP) designates a number of important valley and village views, defined in Policy CE1 and mapped in CNDP Map 2. The purpose of these is to conserve the landscape character of the village. A number of these views extend through the current Strategic Gap.
- 2.4 The HELAA reviewed a total of 43 sites that are either partly or fully within this Strategic Gap. The assessments and classifications for each HELAA site can be viewed within the HELAA itself; a list of the relevant sites is contained in Appendix 1. In summary, the classifications (Figure 1) are:

Figure 1: Classification of sites within the Bexhill, Crowhurst, Battle and Hastings Strategic Gap

Classification	Total
Identified (already permitted or allocated for development)	1
Potential (potentially suitable)	3
Rejected (unsuitable)	39

- 2.5 The one Identified site relates to the final phase of a strategic residential development known as The Gateway/Worsham Farm in North East Bexhill. The easternmost part of the site is within the Strategic Gap and a large area of Green Infrastructure is proposed within the Strategic Gap as part of the planning permission.
- 2.6 The three Potential HELAA sites are BEX0169 (Land north of Mount View Street, Bexhill), CRO0009 (Land at Station Road/Forewood Lane, Crowhurst) and HAF0007 (Land at Breadsell Farm, Hastings Road). For BEX0169, a small part of the site in the northeastern lies within the current Strategic Gap and overlaps with an area of woodland. Sites CRO0009 and HAF0007 are wholly within the current Strategic Gap within Crowhurst village and the edge of St Leonards/Hastings respectively.
- 2.7 Site CRO0009 is a small site adjoining an existing allocation, site CH1, in the Crowhurst Neighbourhood Plan (2025). This site is not within the Important Open Area 4 designated within the Neighbourhood Plan. Through the HELAA, the Council have assessed that this site could be suitable for additional, small scale residential development extending the existing Neighbourhood Plan allocation. The site contains existing agricultural buildings which already present a form of development within the Strategic Gap, all be it agricultural in form. Therefore, the Council have concluded that the Strategic Gap can be amended to accommodate this site within the built-up area of Crowhurst and exclude it from the Strategic Gap.
- 2.8 Site HAF0007 (Land at Breadsell Farm) has been a longstanding area of potential growth. This is a relatively large site adjoining the administrative boundary with Hastings borough. It is identified in the emerging Rother Local Plan as site allocation BT2. It forms part of a larger cross-boundary site with land within Hastings. This adjoining land is currently identified, through Policy D1, as an area of potential growth in the emerging Hastings Local Plan, which at the time of writing is at Regulation 19 stage. The total combined capacity of the whole site has been assessed by the two Councils as 345-445 dwellings.
- 2.9 However, there are some uncertainties on the deliverability of the cross-boundary site at Breadsell Farm, as previously acknowledged in the Rother Local Plan Core

Strategy (2014), specifically paragraphs 9.12 and 9.13, and the Regulation 19 Rother Local Plan (2026). This is due to the nearby Marline Woods Site of Special Scientific Interest (SSSI) and the potential ecological impacts of development and the need for robust ecological monitoring. Therefore, while the site is identified as an allocation/ area of search through the emerging Local Plans, it is concluded that it should remain within the Strategic Gap in the event that the development subject to the allocations cannot come forward. If the required evidence comes forward that development can be delivered sustainably, then the Council consider that the benefits of delivering this scale of housing on a cross-boundary site on the urban edge of St Leonards would outweigh the impact on the Strategic Gap.

- 2.10 In addition to the HELAA sites detailed above, land within the southern part of the Strategic Gap on the former Pebsham Landfill Site at Freshfields has been identified as suitable, in principle, for temporary use as a solar farm. This land is currently inaccessible to the public and unsuitable for any other uses due to the fact that the Landfill Site is still settling and producing gases. Therefore, the Council consider that this area of land is uniquely placed to allow for a solar farm without harming the aims of Strategic Gap, given both the temporary nature and also taking into account the positive benefits of renewable energy generation.
- 2.11 The remainder of the sites assessed through the HELAA have all be rejected and the assessments of these are contained within the HELAA itself. The key themes that arose are:
- a. Many of the sites would impact the High Weald National Landscape or its setting;
 - b. Not being located in a sustainable location;
 - c. Impacts to protected and designated habitats, such as Ancient Woodland, Priority Habitat and SSSIs;
 - d. Flood risk from all sources;
 - e. Located within the Combe Valley Countryside Park; and
 - f. Access constraints.
- 2.12 Land between Bexhill and Hastings has been subject to considerable change in the past decade with the development of the Combe Valley Way (A2690) and

associated road infrastructure on the north-eastern edge of Bexhill releasing land for development, though this is just outside of the Strategic Gap. This includes the under-construction Gateway development at Worsham Farm and also a number of other residential, office and employment uses around Mount View Street and Haven Brook Avenue. Further land around this area has been identified as potentially suitable for further growth, as detailed in the HELAA and the Regulation 19 Rother Local Plan. Therefore, it is important to retain the Strategic Gap in this area to prevent further encroachment into the countryside and the potential coalescence into neighbouring St Leonards. The Strategic Gap around Crowhurst also still serves its purpose, particularly given the distinctive built-up areas that comprise the village, and some of the land in the Strategic Gap is also within the Important Open Area designated through the Neighbourhood Plan. However, as previously referenced, there is scope for a minor reduction to accommodate some further growth in the village. The northern part of the Strategic Gap towards Battle also still serves its purpose as this area is vulnerable to further ribbon development which over time could incrementally encroach into the countryside. The findings of the Strategic Gaps Background Paper (2016) have been reviewed and found to still be relevant.

- 2.13 The Council have therefore concluded that the Strategic Gap should be modified (Figure 2 and Figure 3) to accommodate the additional development potential identified in Crowhurst (as per paragraph 2.7) but should otherwise remain unchanged as the wider area still serves the purposes of preventing coalescence and maintaining the distinctiveness of each of the settlements, particularly through incremental changes over time.

Figure 2: Proposed change to Bexhill, Crowhurst, Battle and St Leonards Strategic Gap

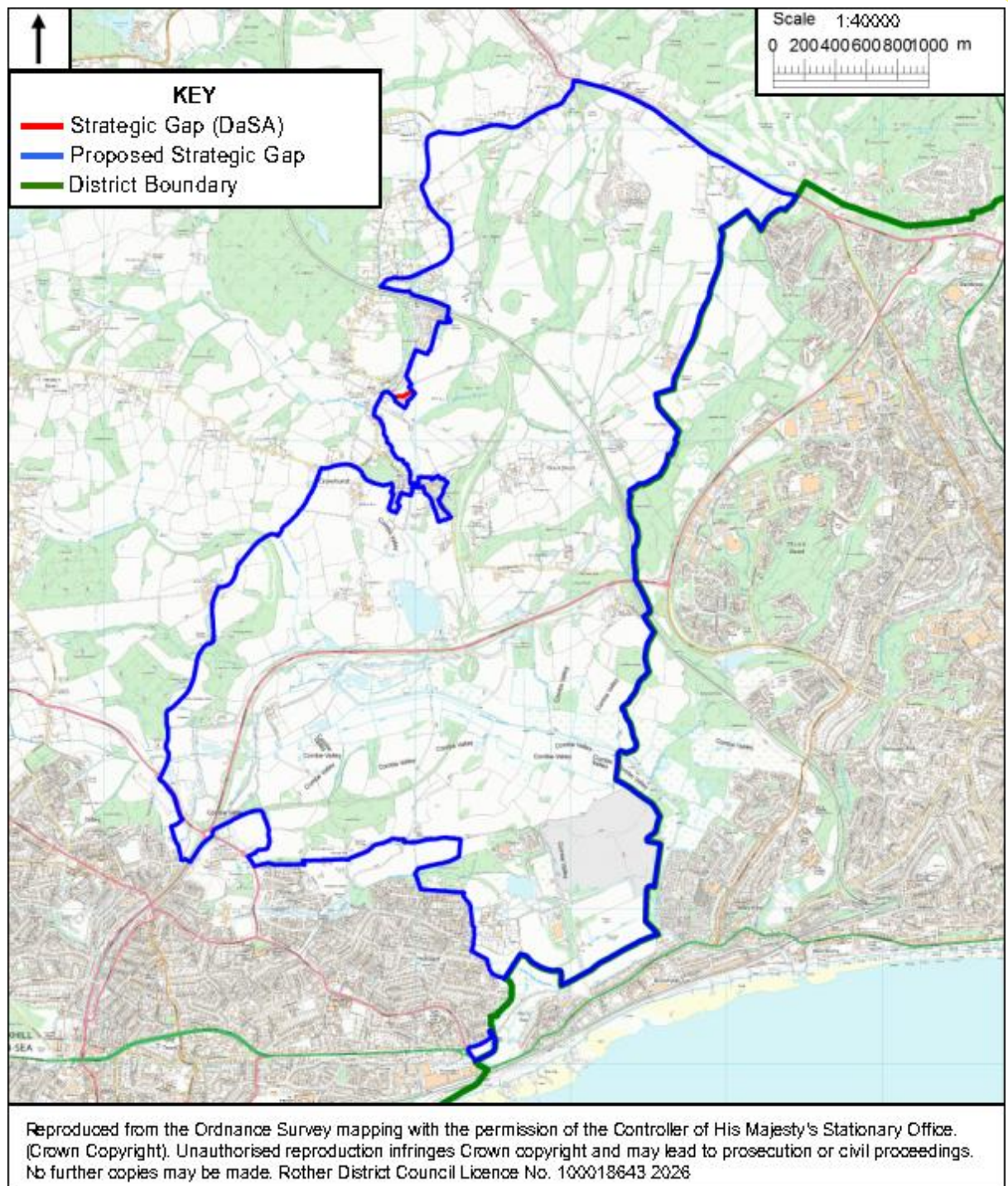
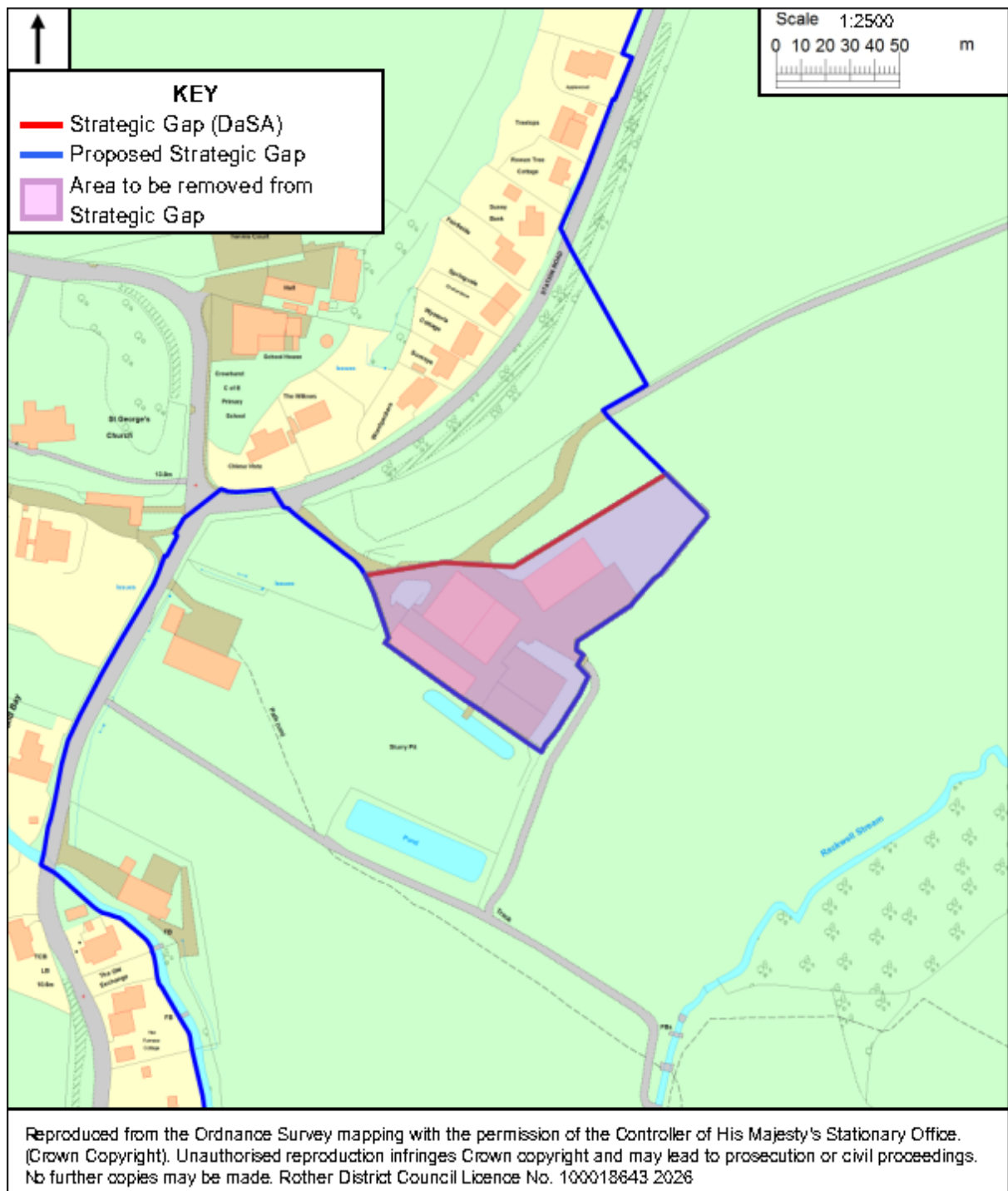


Figure 3: Proposed change to Bexhill, Crowhurst, Battle and St Leonards Strategic Gap showing area to be removed



3. The Fairlight and Hastings Strategic Gap

3.1 The Fairlight and Hastings Strategic Gap extends from the administrative boundary with Hastings borough towards the village of Fairlight Cove. It contains an area of Ancient Woodland (Knowle Wood). It is also adjacent to the Hastings Country Park Local Nature Reserve which in part contains the Hastings Cliffs to Pett Beach SSSI. Most of Strategic Gap falls within the High Weald National Landscape. There are a number of dwellings within the Strategic Gap around the older part of Fairlight and these are predominantly outside of the High Weald National Landscape.

3.2 The HELAA reviewed a total of five sites that are either partly or fully within this Strategic Gap. The assessments and classifications for each HELAA site can be viewed within the HELAA itself; a list of the relevant sites is contained in Appendix 1. In summary, the classifications (Figure 4) are:

Figure 4: Classification of HELAA sites with the Fairlight and Hastings Strategic Gap

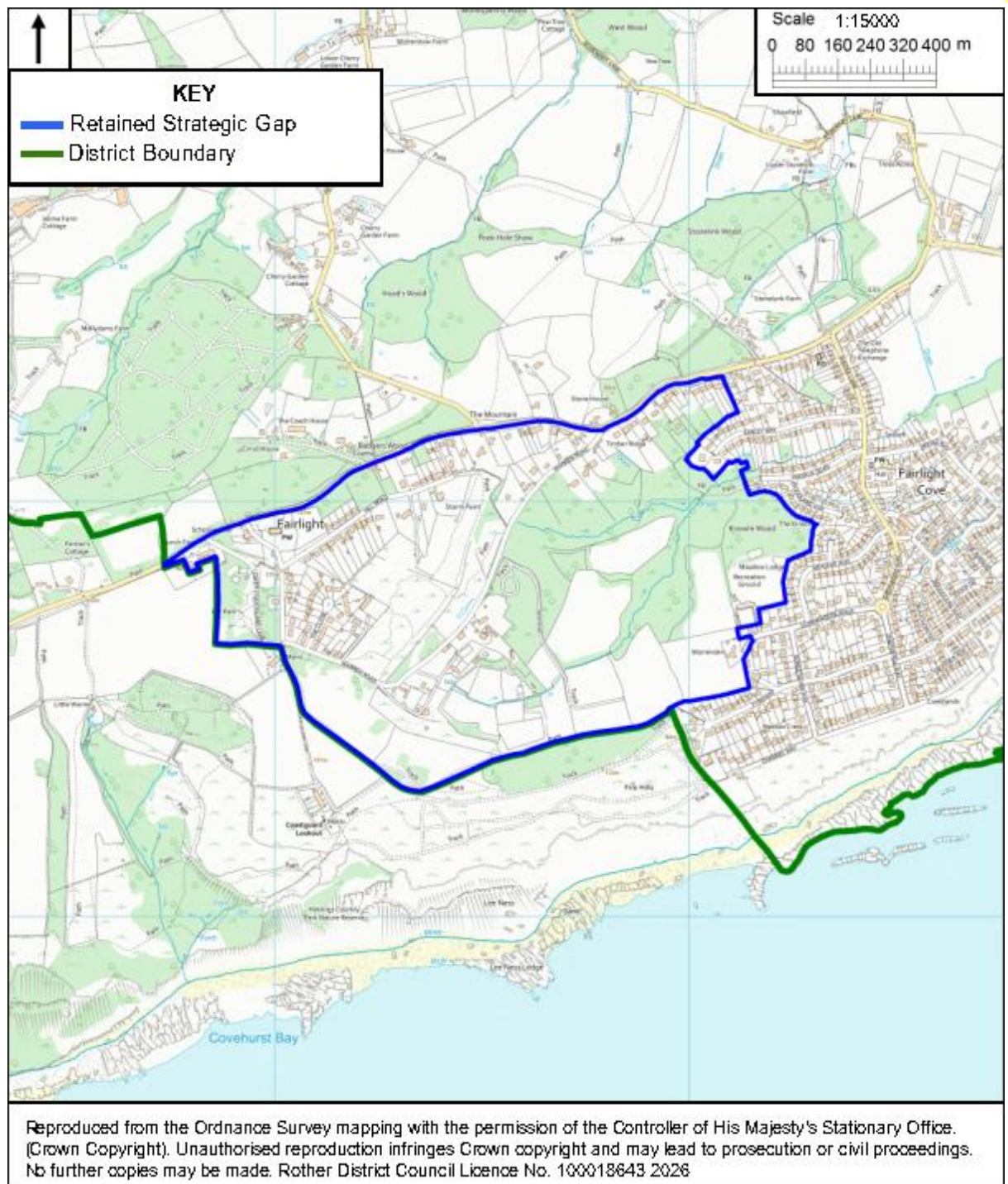
Classification	Total
Identified (already permitted or allocated for development)	0
Potential (potentially suitable)	0
Rejected (unsuitable)	5

3.3 As Figure 4 shows, all of the sites have been rejected in the HELAA. The detailed assessment for each site can be found within the HELAA itself. The key themes that arose are:

- a. Harm to the High Weald National Landscape or its setting;
- b. Encroachment into the countryside;
- c. Environmental impacts, including the presence of Ancient Woodland or Priority Habitats; and
- d. Overall sustainability and means of access.

- 3.4 Overall, the Strategic Gap between the Hastings borough boundary and the edge of Fairlight Cove provides an important function in defending the area between the Hastings Country Park and the edge of the settlements of Fairlight and Fairlight Cove. The findings of the Strategic Gaps Background Paper (2016) have been reviewed and found to still be relevant. The Council have therefore concluded that this Strategic Gap should remain unchanged (Figure 5) as it still serves the purposes in preventing the coalescence of settlements and keeping the settlements distinctive, particularly through smaller scale incremental development emanating from the western part of Fairlight.

Figure 5: Retained Fairlight and Hastings Strategic Gap



4. The Rye/Rye Harbour Strategic Gap

- 4.1 The Rye/Rye Harbour Strategic Gap covers an area of land south of the Rivers Rother and Brede lying between Rye and Rye Harbour. It plays a key role in providing separation from the historic citadel of Rye with its wider environment, particularly the industrial developments within Rye Harbour and the historic village further to the southeast. The area is reclaimed grazing marsh adjacent to the River Rother estuary and is at risk of flooding, being almost exclusively within Flood Zone 3.
- 4.2 The HELAA reviewed a total of four sites that are either partly or fully within this Strategic Gap. The assessments and classifications for each HELAA site can be viewed within the HELAA itself; a list of the relevant sites is contained in Appendix 1. In summary, the classifications (Figure 6) are:

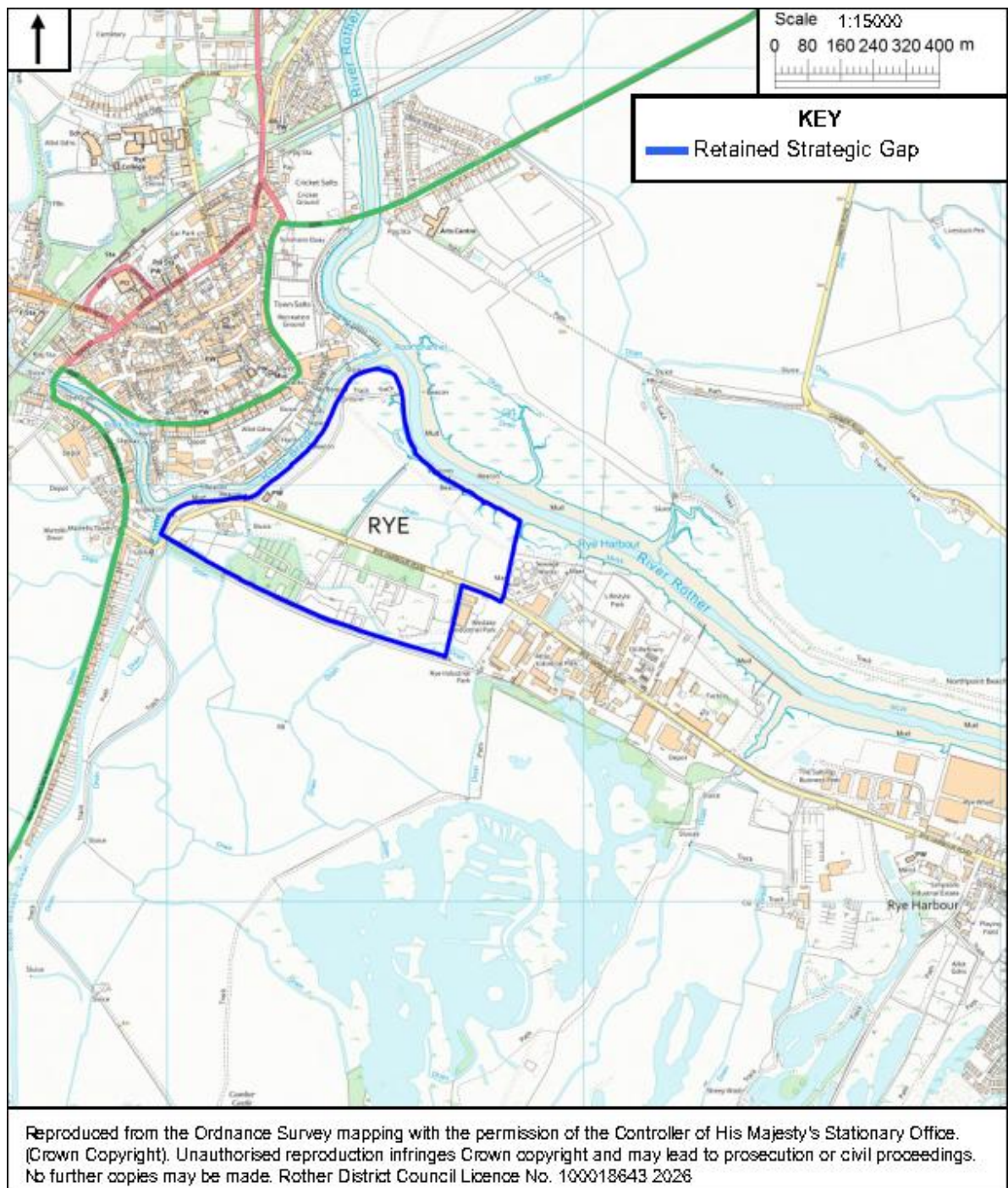
Figure 6: Classification of HELAA sites with the Fairlight and Hastings Strategic Gap

Classification	Total
Identified (already permitted or allocated for development)	0
Potential (potentially suitable)	0
Rejected (unsuitable)	4

- 4.3 As Figure 6 shows, all of the sites have been rejected in the HELAA. The detailed assessment for each site can be found within the HELAA itself. The common themes that arose are:
- Deviation from the established settlement pattern;
 - Harm to the historic built and natural environment of Rye;
 - Proximity to protected habitats, including the Dungeness, Romney Marsh and Rye Bay Ramsar site, Special Protection Area (SPA) and SSSI;
 - Located within Flood Zone 3 and failing the sequential and exception tests.

- 4.4 Overall, the open and largely undeveloped nature of the Strategic Gap maintains the separate identity of Rye and Rye Harbour. The gap is relatively narrow and the character of the two built up areas is very different, meaning that the Strategic Gap maintains their distinctiveness and the strategic settlement pattern. The area is fragile and vulnerable to encroaching development and incremental changes in landscape management, notwithstanding the various environmental designations and constraints that may limit the extent of suitable land. The retention and protection of this Strategic Gap is important to the conservation and enhancement of local landscape character and views. The findings of the Strategic Gaps Background Paper (2016) have been reviewed and found to still be relevant. The Council have therefore concluded that this Strategic Gap should remain unchanged (Figure 7) as it still serves the purposes in preventing the coalescence of settlements and keeping them distinctive.

Figure 7: Retained Rye and Rye Harbour Strategic Gap



5. Conclusions and Policy Recommendations

- 5.1 The Council has reviewed the Strategic Gaps as part of the emerging Local Plan and in light of the land assessed for potential future development through the HELAA, building on the previous Strategic Gaps Background Paper produced to support the DaSA. This has resulted in a slight reduction to the Bexhill, Crowhurst, Battle and St Leonards Strategic Gap within Crowhurst village to accommodate an extension to an existing Neighbourhood Plan allocation. Otherwise, the Strategic Gaps have been found not to provide additional capacity for development. The Strategic Gaps still serve the function of forming part of the strategic settlement pattern through maintaining the separate and distinctive identities between settlements and preventing their coalescence. It is therefore concluded that no other modifications to the Strategic Gaps are to be made.
- 5.2 The policy criteria relating to the Strategic Gaps has also been reviewed. The extant policies are Core Strategy policies HF1 and RY1 and DaSA policy DEN3. Major changes to the policy wording are not considered necessary given the Strategic Gaps still serve their purposes and that the boundaries are remaining substantially unchanged. It is though considered appropriate to incorporate elements of the existing supporting text from the current policies into the new policy wording itself to give greater justification and emphasis on the important individual qualities of each Strategic Gap. The other change required is to identify the in-principle support for a solar farm on the former Pebsham Landfill site, as previously referenced in paragraph 2.10.

Appendix 1: HELAA sites partly or fully within the Strategic Gap

HELAA site	Address	Assessment ³	Strategic Gap
BEX0197	Worsham Farm Site E	Identified	Bexhill/Crowhurst/Battle/Hastings
BEX0169	Land north of Mount View Street	Potential	Bexhill/Crowhurst/Battle/Hastings
CRO0009	Land at Station Road/Forewood Lane	Potential	Bexhill/Crowhurst/Battle/Hastings
HAF0007	Land at Breadsell Farm	Potential	Bexhill/Crowhurst/Battle/Hastings
BAT0046	Land south of Hastings Road	Rejected	Bexhill/Crowhurst/Battle/Hastings
BAT0089	Land at The Cedars	Rejected	Bexhill/Crowhurst/Battle/Hastings
BAT0119	Land at Crowhurst Park, Teham Lane, Battle, TN33 0SL	Rejected	Bexhill/Crowhurst/Battle/Hastings
BAT0125	Land to the south of Hastings Road, Battle, TN33 0SL	Rejected	Bexhill/Crowhurst/Battle/Hastings
BEX0087	Land at Worsham Farm - west	Rejected	Bexhill/Crowhurst/Battle/Hastings
BEX0097	Land east of Filsham Drive	Rejected	Bexhill/Crowhurst/Battle/Hastings
BEX0102	Land West of Glovers Lane	Rejected	Bexhill/Crowhurst/Battle/Hastings
BEX0110	Land adjoining Pebsham Rural Business Park	Rejected	Bexhill/Crowhurst/Battle/Hastings
BEX0131	Land at Glyne Gap Field	Rejected	Bexhill/Crowhurst/Battle/Hastings
BEX0146	Pebsham Equestrian Centre	Rejected	Bexhill/Crowhurst/Battle/Hastings
BEX0151	Actons Farm	Rejected	Bexhill/Crowhurst/Battle/Hastings
BEX0183	Land at Pebsham Farm (south)	Rejected	Bexhill/Crowhurst/Battle/Hastings
BEX0184	Land at Pebsham Farm (central)	Rejected	Bexhill/Crowhurst/Battle/Hastings
BEX0185	Land at Pebsham Farm (north)	Rejected	Bexhill/Crowhurst/Battle/Hastings
BEX0186	Land north-west of Bexhill Road, Pebsham	Rejected	Bexhill/Crowhurst/Battle/Hastings
BEX0200	Land at Worsham Farm - east	Rejected	Bexhill/Crowhurst/Battle/Hastings
BEX0228	Bexhill Enterprise Park North Expansion Land, Havenbrooke Avenue,	Rejected	Bexhill/Crowhurst/Battle/Hastings

³ As detailed in the HELAA, “identified” means the site is suitable for housing or economic development by virtue of being subject to an existing planning permission or allocation; “potential” means the site is potentially suitable for development; and “rejected” means the site is not suitable for development.

HELAA site	Address	Assessment ³	Strategic Gap
CRO0002	Edendale Lodge, Station Road, Crowhurst	Rejected	Bexhill/Crowhurst/Battle/Hastings
CRO0004	Land east of Station Road	Rejected	Bexhill/Crowhurst/Battle/Hastings
CRO0005	Land at Florida	Rejected	Bexhill/Crowhurst/Battle/Hastings
CRO0006	Land East of Station Road	Rejected	Bexhill/Crowhurst/Battle/Hastings
CRO0011	Land south of Catsfield Road	Rejected	Bexhill/Crowhurst/Battle/Hastings
CRO0013	Land between Crouchers and Meadows	Rejected	Bexhill/Crowhurst/Battle/Hastings
CRO0014	Stonebridge Farm	Rejected	Bexhill/Crowhurst/Battle/Hastings
CRO0019	Field north of Pye Farm	Rejected	Bexhill/Crowhurst/Battle/Hastings
CRO0020	Adams Farm	Rejected	Bexhill/Crowhurst/Battle/Hastings
CRO0022	Land next to Adams Farm track	Rejected	Bexhill/Crowhurst/Battle/Hastings
CRO0024	Land at Decoy Farm	Rejected	Bexhill/Crowhurst/Battle/Hastings
CRO0028	Land north of Station	Rejected	Bexhill/Crowhurst/Battle/Hastings
CRO0029	Brakes Coppice	Rejected	Bexhill/Crowhurst/Battle/Hastings
CRO0031	Crowhurst Park site 2	Rejected	Bexhill/Crowhurst/Battle/Hastings
CRO0032	Crowhurst Park Site 3	Rejected	Bexhill/Crowhurst/Battle/Hastings
CRO0033	Crowhurst Park – Manor House	Rejected	Bexhill/Crowhurst/Battle/Hastings
CRO0034	Land between Brakes Coppice and Christian Healing Centre	Rejected	Bexhill/Crowhurst/Battle/Hastings
CRO0037	Land at Royal Oak Lane	Rejected	Bexhill/Crowhurst/Battle/Hastings
HAF0011	Land at Upper Wilting Farm (south)	Rejected	Bexhill/Crowhurst/Battle/Hastings
HAF0020	Land at Lower Wiltings Farm	Rejected	Bexhill/Crowhurst/Battle/Hastings
HAF0022	Land at Upper Wilting Farm (north)	Rejected	Bexhill/Crowhurst/Battle/Hastings
HAF0027	Land at Breadsell Farm Bungalow	Rejected	Bexhill/Crowhurst/Battle/Hastings
FAI0006	Land at Seahome	Rejected	Fairlight/Hastings
FAI0007	Land rear of Sea Breeze	Rejected	Fairlight/Hastings
FAI0008	Warren Farm	Rejected	Fairlight/Hastings
FAI0011	Field at Warren Farm	Rejected	Fairlight/Hastings
FAI0014	Land to the north of Warren Road	Rejected	Fairlight/Hastings
RYE0025	Land at Rye Marina	Rejected	Rye/Rye Harbour
RYE0047	Rye Paddock	Rejected	Rye/Rye Harbour
RYE0053	Land south of Rye Paddock	Rejected	Rye/Rye Harbour
RYE0054	Land south of Harbour Road	Rejected	Rye/Rye Harbour