



Homes
England

The Housing and Regeneration Agency

Responses to consultation:

Rother District Local Plan 2020 – 2040

(Regulation 18)

July 2024



1. Introduction

The following representations are made in response to consultation on the Draft Local Plan (2020 – 2040) (Regulation 18). Separately, appended to these representations are:

- APPENDIX A – Review of HELAA appraisal SAL003 and SAL0024
- APPENDIX B - Summary of Development Strategy Alternative Options (Development Strategy Background Paper)
- APPENDIX C – Landscape Statement (The Environment Partnership, July 2024)
- Appendix D – Site Boundary (drawings 13347-CRH-XX-26-FG-G-7003 – P1)

Executive Summary

- This document is Homes England’s response to the Regulation 18 consultation by Rother District Council.
- Homes England is supportive of the Council’s progression with the Local Plan review. We do however have some reservations regarding the draft strategies for meeting housing needs, including the spatial distribution of development and the level of overall housing delivery will be brought forward.
- The Council’s Authority Monitoring Report (AMR) (December 2023) identified that average housing delivery in the district has achieved only 204 dwellings per annum (district wide) since 2011/12 and the AMR identifies that meeting the current housing requirement to the end of the plan period is reliant on a step change in delivery which has not historically been achieved, including reliance on the timely delivery of strategic sites.
- The draft local plan proposes an overall development strategy to achieve a range of delivery with a minimum of 5,158 and maximum of 7,287 dwellings, equating to 258 to 364 dwellings per annum. The top of the proposed range equates to just 50% of the minimum local housing need identified in the 2024 HEDNA.
- It is clear that a more robust examination of options to address the Local Housing Need is required by the Council, in accordance with NPPF, to bring forth an ambitious, deliverable and positively prepared plan which will go on to meet the needs of Rother for the Plan Period.
- It is clear from the evidence base that Robertsbridge is a sustainable location capable of accommodating additional growth than is currently identified and there is a real opportunity here to meet the housing need identified within the District. Enhanced growth should be attributed to Robertsbridge in the next iteration of the Plan.
- Homes England acquired land within Robertsbridge in March 2024, with a view to submitting a residential-led planning application in mid/late 2025 on the former Hodson’s Mill site and adjacent land (HELAA reference SAL003 and SAL0024);
- An allocation exists in the neighbourhood plan for the Hodson’s Mill site (SAL003) and planning permission was granted in July 2021. Homes England continue to support the allocation for development in this location.
- These representations seek to also highlight the suitability of the adjacent SAL0024 (‘Land North of Northbridge Road, Robertsbridge’) to deliver additional housing in a sustainable location, which is suitable, available and achievable. It is recognised that sensitive site constraints will need to be considered. Analysis has been undertaken to support these representations and assess the site’s potential. This analysis concludes that a sensitively

designed development with appropriate mitigation can be accommodated in this location. Namely:

- The SAL0024 land has moderate capacity for development and that, sensitively delivered, it would conserve and enhance landscape and scenic beauty of the National Landscape;
 - With due attention to the scale and design of development it will not harm the setting of the Northbridge Street Conservation Area, retaining views south across the wider landscape; and
 - The site is in an accessible location, within 800m of all the qualifying facilities listed in draft policy LWL2 meeting its highest accessibility standard.
 - SAL0024 could be delivered on its own or in tandem with the adjacent Mill site.
- Homes England’s approach to progressing planning applications is to work collaboratively with Rother Council and other stakeholders, such as Statutory Stakeholders, the Parish Council, resident’s groups and the local community to shape the proposals together. Engagement with communities is critical to designing places that meet peoples’ needs and this is something that is fundamentally embedded in Homes England’s approach.

To conclude, given Homes England’s role and commitment to unlocking development in accordance with our Strategic Plan, there is the opportunity for our interventions to bring forth a sustainable, high-quality development, which is sensitively designed to respond to the environmental constraints present in Robertsbridge. This will deliver much needed homes for the local area and contribute to the wider housing needs in the District. In addition to directing greater growth to the settlement of Robertsbridge, it is also considered that both SAL003 and SAL0024 should be identified as future development sites.

Context

Homes England acquired the land and buildings at Hodson’s Mill and adjacent field parcel, Robertsbridge in March 2024. The site’s extent is shown in Appendix D. It is the Agency’s intention to submit a fresh planning application in mid/late 2025, and in so doing, unlock the site for development before appointing a developer to deliver the residential-led proposals. The focus of our representations relate to Robertsbridge, its place within the settlement hierarchy, and the potential for further growth. Before responding to the consultation questions, we set out some more information about Homes England and our ability to shape and delivery quality proposals at pace.

Homes England’s Role

Homes England are the government’s housing and regeneration agency. Established in 2008 our mission is to drive regeneration and housing delivery to create high quality homes and thriving places. We are a catalyst for urban renewal, helping to create thriving communities. We promote innovation, ensure homes are safe, and drive sustainable communities.

Our Strategic Plan 2023-2028 sets out how we will use our land, funding and expertise to deliver better homes and places for the people who need them. To achieve this, we will:

- Support the creation of vibrant and successful places that people can be proud of, working with local leaders and other partners to deliver housing-led, mixed-use regeneration with a brownfield first approach;

- Facilitate the creation of the homes people need, intervening where necessary, to ensure places have enough homes of the right type and tenure;
- Promote the creation of high-quality homes in well-designed places that reflect community priorities by taking an inclusive and long-term approach;
- Build a housing and regeneration sector that works for everyone, driving diversification, partnership working, and innovation;
- Enable sustainable homes and places, maximising their positive contribution to the natural environment and minimising their environmental impact.

It is also our role to partner with local government and to work collaboratively with Local Planning Authorities to help tackle these challenges and enable the delivery of high-quality, sustainable new homes and regeneration. We also know that engagement with communities is critical to designing places that meet peoples' needs and this is something that is embedded in our approach.

Local Plan

Overarchingly it is important to state that Homes England welcomes, and is very supportive of, the Council progressing preparation of the new Local Plan for Rother. The new Local Plan will be a very important tool in guiding development at the local level over the next 15 years.

Whilst we welcome the publication of the draft plan, we express reservations on its draft strategies for meeting housing needs, including the spatial distribution of development and the level of overall housing delivery that it will bring forward. Given the stage of plan-making, the response focuses on the Council's preferred spatial strategy, the assumptions which underpin that and how the Council is proposing to meet the identified development needs. The district of Rother is environmentally constrained, including just over 80% of it falling under the High Weald National Landscape designation along with areas exposed to flooding and ecological designations. We have acknowledged how the draft Local Plan responds to those constraints, but we consider a new Local Plan should be able to meet much more of the District's identified housing needs, than is presently targeted.

For simplicity this reply follows the same order as the Council's consultation. We first respond to the general goals and objectives of the spatial strategy and related policies that secure its delivery. We respond in detail promoting the capacity for more development at Robertsbridge, and in particular via the Hodson's Mill site (HELAA SAL003) and its adjacent land (HELAA SAL0024). Robertsbridge is a key Rural Service Centre and located within the most sustainable location in northern Rother. It is capable of sustainably accommodating a higher level of growth than currently identified. The settlement benefits from a good range of facilities and services including excellent transport connectivity by bus and rail and there are further site options that can be sustainably delivered.

The following provides an overview for the two HELAA sites which are the focus of the representations in terms of site allocations:

SAL003: The Mill Site is already allocated in the Salehurst and Robertsbridge Neighbourhood Plan¹ (Policy HO2) for housing and employment led regeneration and obtained planning permission previously for development of 96 no. homes and 1200sqm of employment floorspace (reference:

¹ Salehurst and Robertsbridge Neighbourhood Plan 2016-2028 (Made 2018)

RR/2017/382/P and RR/2017/383/L). Homes England continue to support this allocation and its regeneration will deliver significant environmental, social and economic benefits.

SAL0024: Homes England are also promoting development on the adjacent land to the Mill Site which we feel can bring forward a high-quality, sustainable development that takes advantage of the location of the site, the Mill site's redevelopment, and offers capacity to meet more of the identified housing need.

2. Plan Making Context

The draft Local Plan Regulation 18 consultation identifies the Vision, overall priorities and strategic objectives to address the key issues and challenges facing the district over the plan period 2020 – 2040. In producing these representations, we have given careful consideration to the December 2023 National Planning Policy Framework and to the Planning Practice Guidance (for ease referred collectively as national policy), and to the Council's current development plan.

National Policy

The focus of national policy is the delivery of sustainable development. Importantly, the focus of the plan making stage is to meet as much of the identified needs for an area as possible, whether that be housing, economic growth or otherwise, within a given plan period unless environmental or other constraining factors provide a strong reason to limit policy responses or mean that the benefits of additional development are outweighed by the harms that may arise. The tests for this are clearly established by the Framework (particularly paragraph 11c).

The incoming government has outlined its intentions to reaffirm mandatory housing requirements for Local Planning Authorities through national policy, and has set out its legislative ambitions, most recently via the King's Speech for planning reform and to drive housebuilding growth across the country. Our overarching view is that the draft Local Plan presently needs to do much more to significantly boost housing delivery and tackle housing needs. It is Homes England's view that Robertsbridge offers the potential to deliver additional housing beyond that which is currently identified, given its sustainable location and based on the assessment work that has been undertaken to support these representations.

Environmental Constraints

We acknowledge that in preparing the Local Plan there are sensitive environmental factors that form key considerations which will inform the draft Local Plan and spatial strategy. This includes, roughly 80% of Rother is covered by National Landscape (High Weald Area of Outstanding Natural Beauty) and a further 7% of the district beyond it is nationally or internationally designated for its nature conservation value. Significant areas of the district are also affected by flood risk including surface water flooding. Paragraph 11c of the Framework is therefore triggered. However, meeting identified needs in full should only be avoided if the other adverse effects of would significantly and demonstrably outweigh the benefits of doing so.

Rother's constraints will inevitably influence the scale and distribution of development in the district, and very likely will impinge on meeting the full housing need derived from the Standard Method but it is vital that preparation of the Local Plan considers all reasonable alternatives distribution options in sustainable settlements capable of accommodating growth. It also emphasises the need to promote development in the right locations, to deliver on need whilst continuing to safeguard more sensitive locations. In this context, it is considered that Robertsbridge offers greater opportunities for housing delivery than that which is currently identified.

Housing Need

Given the environmental constraints present in Rother, meeting the Council's Housing Need will need to be carefully considered. Local housing need (LHN) for Rother based upon the Standard Method is 733 dwellings each year ('dpa'; 2023 base date), providing 14,660 dwellings over the chosen plan period (2020 – 2040). While an advisory starting point the Standard Method provides the minimum expectation in national policy and guidance with the aim to meet as much of the identified housing need as possible (NPPF 60). Indeed, a sensible starting point when preparing the objectives for a plan, particularly noting the area's sensitivities, is to seek to plan for housing delivery that offers the potential to exceed that number so that spare capacity, or resilience, is built in to meeting the objectives should some site allocations, particularly any larger strategic sites with more complex infrastructure or delivery requirements fall behind or fail to come forwards as envisaged. It is even more important at the early plan making stage to enshrine such an approach in strategic decisions. The main source of sites to address local housing need is drawn from the HELAA and sites submitted through Local Plan consultation stages.

Current Housing Delivery

The Council is struggling to meet its housing supply requirement. Its latest position, in April 2022 ², shows its current plan is falling far short of meeting local needs³ and net housing delivery in the district has significantly fallen below the annualised adopted Local Plan housing requirement. The Council's AMR⁴ and Housing and Economic Needs Assessment (HEDNA, 2024) provide further evidence that average housing delivery in the district has achieved only 204 dwellings per annum (district wide) since 2011/12. Furthermore, housing delivery in the rural area has been particularly low including within Robertsbridge.

As set out in the AMR (December 2023) meeting the current housing requirement to the end of the plan period is reliant on a step change in delivery which has not historically been achieved and reliant on the timely delivery of strategic sites and the A21 link road for which there is considerable uncertainty.

These low levels of housing delivery should be a key contextual consideration in the plan making process and set the background for an aspirational and positively prepared approach is needed to meet Rother's need, whilst ensuring deliverability.

² 'Housing Land Supply and Housing Trajectory April 2022 position statement', Rother District Council

³ Achieving just 2.79 of the 5 year requirement mandated in national planning policy

⁴ Rother District Council Authority Monitoring Report, 2023

Affordability

Housing affordability and access to housing is a key issue for the district as identified in the council's Housing and Economic Development Needs Assessment (HEDNA)⁵. In Rother, as across the country, and particularly the southeast of England, the affordability ratio and (therefore) access to housing for those on average household incomes has progressively worsened. While there is no need to go beyond the Standard Method to tackle affordability, it is necessary to meet it, and if not then as much of the housing need in the district as is possible (NPPF Para 60). The 2024 HEDNA identifies that median house prices are now "*substantially higher than that in Hastings and the average for the wider South East*" (our emphasis) and the Office of National Statistics currently indicates that Rother's affordability ratio is 12.2.

Draft Local Plan

The existing spatial strategy is set out by the adopted Core Strategy⁶ (2014) and adopted Neighbourhood Plans. At nearly ten years old, the Core Strategy set out a housing requirement of 5,700 homes (335 dpa) to be delivered over the plan period 2011 to 2028. The draft local plan's preferred strategy would generate a range of just 258 to 364 homes per year – providing between 5,158 and 7,287 dwellings over the plan period. The higher end of that range would see 2,129 dwellings from new allocation sites (from the HELAA and call for sites). The lower end would be beneath that which was previously required.

The Council accepts there remains work to be done in terms of site appraisal and selection to support the local plan and recognise there may be potential to increase the supply figure further. We are concerned that at this stage the Council is not taking a more positive and ambitious stance or that its evidence will support such a low target range. Currently the draft plan's approach could fail to meet as much as 65% of the minimum local housing requirement defined by the standard method.

The Framework is clear that strategic policies should, as a minimum, provide for objectively assessed needs for housing and meet as much of the identified need as possible. The approach taken in the draft local plan would not currently accord with these requirements, and the government's objective, of boosting significantly the supply of homes. Most recently the newly elected Government has restated its intention that 1.5 million new homes are built by the end of 2029 (this parliament's maximum term) and we expect renewed focus on trying to boost housebuilding in England to meet the 300,000 new homes required each year.

Robertsbridge

The 2021 census identifies a population of 93,111 people within the district of Rother, split roughly half and half between rural areas and the town of Bexhill. Given Rother's particular rural characteristics there should be a significant emphasis on promoting the future vitality of the most sustainable rural settlements and on the importance of end-destination based sustainability (NPPF Para 83).

⁵ Housing and Economic Development Needs Assessment Update, DLP Planning, February 2024.

⁶ Rother Local Plan Core Strategy, September 2014.

The existing Core Strategy set out a distribution of housing growth that followed a hierarchical approach to the settlement types located in Rother, relying significantly on the delivery in the rural area and villages (with 1,670 homes out of the total 5,700 directed here – circa 30%). The rural service centre of Robertsbridge offers great potential to accommodate village growth, given its good connectivity to the strategic road network (A21) and the fact that it is located on the main London rail line, which offers serves in just over an hour. Robertsbridge is identified as a Rural Service Centre and a hub whose facilities a number of smaller settlements depend upon, including Hurst Green (a Local Service Centre itself), Etchingham, Staplecross, Mountfield and John’s Cross.

The ‘Draft Settlements Study’ (DSS)⁷ at the time emphasised:

- the key role of Robertsbridge in the context of the wider spatial strategy
- the reliance of other settlements on Robertsbridge.
- the constraints limiting growth in other settlements.

Whilst Robertsbridge took the highest ‘share’ of proposed housing², as one of the most sustainable villages, this was still quite low⁸.

The draft local plan evidence base documents correctly identifies Robertsbridge as a highly sustainable settlement and a focus for growth in the district. Robertsbridge performs very highly in regard to the presence of available services, facilities and public transport options. It is supported by both primary and secondary educational facilities and connected via bus and rail links.

In addition, Robertsbridge is covered by a Neighbourhood Plan, which also includes Salehurst. The Neighbourhood Plan is more recent ⁹and supports sustainable development in the village. The Neighbourhood Plan observes there has been a low level of local housing delivery in the parish relation to needs – 20 new homes built in Salehurst and Robertsbridge over a period of 9 years. It allocates sites to meet the 155 homes required by the Core Strategy.

Given the importance of development within villages in Rother and the importance of Robertsbridge within this context, there is a need, and significant opportunity, to deliver a higher rate proportionate to local housing needs and promote the role and function of this settlement. We suggest that Robertsbridge is still identified as a key rural service centre in the hierarchy. However, it is capable of accommodating a higher level of growth than currently identified in the draft local plan in view of its sustainability. In response to question 51 we do say that the settlement should be considered sustainable rather than moderately sustainable which supports the rationale for directing more growth to the settlement.

The future role of Hodson’s Mill and adjacent land within Robertsbridge

Site’s SAL003 and SAL0024 are located in Northbridge Street and are considered, within the above context, to play a pivotal role in achieving the above objectives.

⁷ ‘Draft Rural Settlements Study’, November 2008.

⁸ Approximately 8 dwellings per year

⁹ Made in July 2018 and therefore >5 years old for the purposes of NPPF policies

Hodson's Mill (HELAA site SAL003) is allocated in the Salehurst and Robertsbridge Neighbourhood Plan (2016 – 2028) which was Made in July 2018. As previously noted, Policy HO2 of the Neighbourhood Plan allocates the site for mixed use development including residential and employment development. The allocation makes provision for conversion of the Mill building and onsite listed buildings. Rother District Council granted planning and listed building consent (Application Ref RR/2017/382/P and RR/2017/383/L) for the erection of 96 residential dwellings (Use Class C3) and commercial development comprising 280sqm (Use Class A3) and 920sqm (Use Class B1).

The draft Local Plan (Regulation 18) Northern Rother Settlements Development Strategy (Figure 32) includes the Hodson's Mill site (NDP allocation HO2) within identified supply for 96 dwellings and 1,200sqm of employment floorspace – this being based on the recent planning permission for the site. Homes England continue to support this allocation, noting that the scheme would bring forward the regeneration of a historic brownfield site in an accessible location in Robertsbridge and that there is strong local support for the redevelopment of this site.

'Land North of Northbridge Road, Robertsbridge' (HELAA site SAL0024) comprises adjacent land to the north of the consented Hodson's Mill Site. This site has been actively promoted to the council through preparation of the new local plan. The promotion of this site in combination with the Hodson's Mill site is supported by the range of technical assessments provided for the former including transport, flood risk, landscape, heritage and ecology assessment. Through these it is reasonable to conclude that both the Mill site and the adjacent land are suitable, available and achievable for inclusion in the HELAA and Local Plan housing land supply. The Council has raised some concerns in its assessment of the site which merit closer assessment and we allay these in the following representations. Our evaluation of the site finds that the site has the opportunity to sensitively deliver additional housing following a high-quality, landscape-led approach, does not adversely impact the character of the conservation area and is a sustainable location for development (within 800m of relevant amenities/services).

In response to R18 consultation question 70 we provide a response supporting the suitability of HELAA site SAL0024 and a detail assessment in Appendix A.

It is Homes England's view that, Robertsbridge and notably SAL003 and SAL0024 offer a greater opportunity for housing delivery than is currently being considered by the Council in the draft Local Plan. Given the wider environmental constraints, the importance of village locations and the concerns around housing need in this area, it is important that the Council take a positive approach to plan making, with an aspirational approach to achieving sustainable development. It is therefore recommended that SAL003 remain as a site allocation and that SAL0024 be included for housing delivery. As above, we consider that Robertsbridge's status is as a key rural service centre as defined by the council, but reflecting its role and sustainability, it is capable of supporting a higher level of growth.

3. Rother Local Plan 2020 – 2040 Draft (Regulation 18) Version April 2024

Responses to Consultation Questions

In this section we set out our replies to the consultation questions. These are structured by section and question in the order they appear for ease of review.

Section 5: Development Strategy and Principles

51. What are your views on the Council's preferred spatial development options?

The Development Strategy background paper¹⁰ and SA has considered a range of high-level development strategy options. The Council's 'preferred' strategy is a hybrid approach including a number of high-level spatial options that have been appraised through the Development Strategy background paper and through SA.

Homes England support spatial development options SDO4 and SDO10 which includes directing growth to the key rural service centre of Robertsbridge. The settlement of Robertsbridge is a highly sustainable location to accommodate growth with an excellent range of key services and facilities and well connected to the wider strategic transport network (including A21 and main line railway).

The spatial strategy and proposed housing development quantum fall significantly below local housing need derived from the standard method¹¹. Therefore, the Council should leave no stone unturned in respect of robustly examining options to address this need in accordance with NPPF paragraphs 11 and 60. Due to this significant housing shortfall the Council should consider higher growth options in sustainable settlements such as Robertsbridge. This settlement is capable of accommodating a higher level of growth (than currently identified in the draft plan) in accordance with its role and function, level of constraints and availability of good sites.

Option SDO11 'Growth in Settlements with train stations' performed well through the SA but is not included as a preferred option in the draft plan. As part of a hybrid approach, it is recognised that **SDO11** is logically incorporated into the preferred strategy hybrid approach and **SDO4 / SDO10**.

The emerging local plan development strategy has been informed by the Settlement Study^[1] published as part of this regulation 18 consultation. The Settlement Study has reviewed the existing designation of settlements by addressing the function, sustainability and physical constraints of built-up areas in the district. Homes England welcomes the study's conclusion that Robertsbridge and Northbridge Street are the most sustainable rural villages in the district. However, Homes England object to the classification of Robertsbridge as 'Moderately Sustainable' and consider that the settlement should be reclassified as 'Sustainable' and that a higher level of growth should be directed to the settlement than currently identified in the draft Local Plan.

¹⁰ Development Strategy Background Paper, Draft (Regulation 18) Version – April 2024

¹¹ see responses below to Q.54, 55

^[1] Settlement Study, Draft (Regulation 18) Version – April 2024.

Robertsbridge is a highly sustainable settlement which benefits from good accessibility to a range of 'essential services' and achieves a good overall service level to meet day to day needs. The settlement is also very well connected by an accessible main London line railway station and regular public transport services providing connectivity to services further afield and wider employment opportunities. Robertsbridge also acts as a hub for a number of nearby settlements that rely on it for key services and facilities including as a hub whose facilities a number of smaller settlements depend upon, including Hurst Green, Etchingam, Staplecross, Mountfield and John's Cross. The settlement also benefits from good site options that can be delivered in the context of physical and environmental constraints.

Robertsbridge only scores one point less than Little Common (Bexhill) which is classified as a 'Sustainable Settlement'. Little Common (Bexhill) has a railway station (Colington) but by comparison this station is approximately 3 times further away and not walkable. Furthermore, Robertsbridge is within closer commuting distance of London (1h18min) compared to Little Common (2 hours). Therefore, the difference in scoring between Little Common Bexhill and Robertsbridge is marginal and Robertsbridge should be identified as a 'sustainable settlement'. This is also in view of the known constraints which limit growth in the Bexhill area.

The spatial strategy and proposed housing development quantum fall significantly below local housing need derived from the standard method^[2]. Therefore, the Council should leave no stone unturned in respect of robustly examining options to address this need in accordance with NPPF paragraphs 11 and 60. Due to this significant housing shortfall the Council should consider higher growth options in sustainable settlements such as Robertsbridge

52. Do you have any comments on the merits of the alternative Spatial Development Options, that do not form part of the preferred development options – as explained in the background paper?

SDO3B, 7, 8, 9 & 12 have been discounted as discussed in the background paper and through the SA.

Option **SDO9** essentially takes a strategic approach to the distribution of development according to settlement hierarchy and the role and function of settlements. With constraints taken into account this is a sustainable approach that directs proportionate growth to the most sustainable and least constrained settlements with a good range of key facilities and infrastructure including Robertsbridge.

Given the very significant shortfall housing supply against LHN, further consideration should be given to all reasonable alternative development strategy options. This includes SDO12 and promoting additional sites sensitively located within National Landscapes (In relation to the AONB). Further consideration is required (informed by landscape evidence) regarding appropriate locations for growth within and adjoining the most sustainable settlements including Robertsbridge. A strategic landscape review is required to robustly determine additional locations for growth which wherever possible conserve the setting of the National Landscape. This approach would in turn satisfy to NPPF paragraphs 11(c) and 60.

^[2] see responses below to Q.54, 55

We believe that a robust assessment would identify an additional number of rural sites (i.e. **SD07**) including within the National Landscape as there will be areas that offer capacity to accommodate residential development on small and medium sized sites. These will enable the Council to plan to meet a greater proportion of the identified housing need. Small and medium sized sites are less likely to be encumbered by infrastructure burdens and land assembly issues and can make an important contribution to meeting the housing requirement of an area¹².

This response provides key evidence that supports such a site (Sale and Robertsbridge HELAA sites SAL003 and SAL0024) as an example. Given the significant shortfall in housing land supply the above options requires much greater consideration by the Council while the evidence supplied should help inform the council's appraisal of options in Robertsbridge.

53. Are there any other development options that the Council should consider as part of its Local Plan?

As the Council refines the proposed development strategy it will be appropriate to give further consideration to the proportion of growth directed to the most sustainable settlements including Robertsbridge which is capable of accommodating a higher level of growth than currently identified in the draft plan.

It would be appropriate to revisit the classifications of settlements based upon;

- their own number, type and combinations of services
- the dependence of other settlement upon those services
- their inter-connectivity to other settlements

A sufficient number of settlements need to be selected to enable sufficient housing delivery and to demonstrate that the plan has sought to deliver as close to LHN (standard method) as possible in accordance with NPPF paragraph 60. As part of this the limitations of larger settlements, and not just their level of accessibility, also need to be considered.

We do not consider the Council has evidenced that it can discount a combination of development options, SDO9, SDO4, SD10 and SD11, if it is to meet as high a proportion of identified housing need as possible in line with the Framework.

We therefore strongly recommend that the Council review the importance of Robertsbridge as a sustainable village location, with potential to deliver additional housing capacity in a sensitive manner. Alongside SAL003, it is recommended that SAL0024 also be included for development.

54. What are your views on the Council's proposed spatial development strategy and proposed minimum targets for housing and employment growth?

AND

55. Are there any alternatives or additional points the Council should be considering?

¹² NPPF paragraph 70

NPPF paragraph 61 confirms that to determine the minimum number of homes needed a local housing needs assessment should be undertaken conducted using the standard method in national planning guidance. The outcome of the standard method is the advisory starting point for establishing a housing requirement for an area. The Council's evidence, by way of the HEDNA (2024), confirms that there are no exceptional circumstances to justify an alternative approach to assessing local housing need. Therefore, the standard method is applied to establish the minimum number of homes needed in Rother District. Local housing need (LHN) for the district (standard method) is 733 dwellings per annum (2023 base date) which equates to 14,660 dwellings over the plan period (2020 – 2040). The local housing need assessment in the draft plan applies a 2023 base date which updates the 2024 HEDNA which applied a 2022 base year. Within the same HMA the 2024 HEDNA identifies LHN (standard method) for Hastings at 481 dpa (2022 base year).

The draft local plan proposes an overall development strategy to achieve a range of delivery with a minimum of 5,158 and maximum of 7,287 dwellings, equating to 258 to 364 dwellings per annum. The top of the proposed range equates to just 50% of the minimum local housing need identified in the 2024 HEDNA and cannot therefore be considered sound.

We note the current policy wording is poorly worded citing that, *'the Council will meet the local need for all forms of housing'*. This is not the case. As it stands as there would be significant housing need left unmet. The lower end of the proposed housing range has been established from the total of 'identified sites' (current allocations and sites with planning permission). The upper end of the range includes the total assumed capacity of sites in the Council's Housing & Economic Land Availability Assessment (HELAA) that have been found potentially suitable, available and achievable during the plan period and that the range is subject to change.

We are concerned the draft plan's proposed spatial development strategy will have a substantial shortfall in housing land supply against local housing need derived from the standard method. This will not deliver nearly the number of affordable homes which HEDNA, concludes are required, or the amount of market homes to provide choice and competition among sites necessary to meet demand and address issues of affordability for those at or below average household incomes.

Critically, draft policies do not yet specify what percentage of Affordable Housing will be sought from residential schemes, typically viability tested policies achieve 30-40% (notwithstanding the viability challenges of bringing forth complex brownfield sites), while reliance on higher thresholds can reduce overall delivery across a full range of sites. Even the high end of Council's suggested annual housing delivery would fall very far short of meeting the identified need for Affordable Housing as identified in the HEDNA. Without a change in course the plan would end up meeting as little as 30% of the Affordable Housing need forecast in the latest evidence (2024 HEDNA). By comparison achieving the Standard Method figure would meet 67-90% of affordable need.

The draft local plan must examine all reasonable alternatives to ensure strategic policies respond to and meet local housing need. Given limitations in capacity of Bexhill, Rye and Battle, it is important to flag that the council does not appear to have robustly examined the capacity for additional growth in other sustainable locations such as the rural service centres. The policy states that the focus for the remainder of housing growth/delivery will be directed to:

“sensitive development in other rural settlements of the district; and in the longer-term, sensitive growth along the A21 Corridor”

The Development Strategy background paper sets out the settlements included in this option that perform best in terms of sustainability. The policy wording of the Preferred Spatial Development Options and overall Spatial Development Strategy is not consistent and needs to be clear which settlements are referred to.

In accordance with NPPF paragraphs 20 and 60, the council will need to examine all reasonable alternative growth scenarios and site options for delivering as much of local housing need (derived from the standard method) as possible. This will need to include a robust examination of site options in sustainable settlements capable of accommodating growth, such as the rural service centre of Robertsbridge, notably SAL003 and SAL0024 as identified.

68. What are your views on the vision for Northern Rother?

The Vision for Northern Rother is too broad. It is vague / requires greater clarity about which sustainable settlements will be a focus for growth in the area. The policy refers to small scale growth in the villages, avoiding differentiating between the most sustainable settlements. Detail in the background evidence needs to be brought forward into the wording of the policy.

The Settlement Study and Development Strategy background paper confirm the key role of Robertsbridge in accommodating growth; the policy does not. There needs to be a clear thread from the Preferred Spatial Development Options, Overall Spatial Development Strategy through to the Vision for Northern Rother to clarify in the policies which settlements are a focus for growth. It is recommended that greater emphasis is given to the role of Robertsbridge as a sustainable location capable of delivering additional housing beyond that which has currently been identified.

It is welcomed that the status of settlements like Robertsbridge is acknowledged in the Vision as a key transport hub for wider villages in Northern Rother which makes it a sustainable location to accommodate growth. This then needs to translate into clear policy.

69. What are your views on the distribution and opportunities for growth in settlements within the sub-area in figures 29, 30 & 31?

Figure 29 sets out the Council’s proposed development strategy for Northern Rother including Robertsbridge. Housing supply currently identified by the council for the northern Rother settlements totals 623 dwellings and 30dpa over the plan period. In view of the substantial shortfall within the district in providing for local housing need (standard method) there is a need to consider higher levels of growth in the most sustainable settlements in the north, including Robertsbridge which also benefits from a number of suitable site options.

For Robertsbridge, Figure 29 includes an ‘identified’ housing supply of 178 dwellings comprised of the 4 sites allocated by Policy HO2 of the Salehurst and Robertsbridge Neighbourhood Plan, which includes the Hodson’s Mill site. The Council acknowledges that Robertsbridge is a sustainable settlement capable of accommodating additional growth and capacity for a further 127 dwellings has been identified comprising sites currently identified in the HELAA with potential to be suitable,

available and achievable during the plan period. A total of 305 dwellings is included in Figure 29 which equates to delivery of approximately 15dpa over the plan period. Figure 29 does not include all suitable, available and achievable HELAA sites in Robertsbridge. Our response to question 70 sets out the justification for inclusion of HELAA site SAL0024 within the draft local plan housing land supply.

Housing delivery rates in Rother have been poor with the 2024 HEDNA identifying that an average of only 204 dwellings per annum have been delivered in the district since 2011/12. The Salehurst and Robertsbridge Neighbourhood Plan also reflects on housing under delivery in the NDP area with only 20 completions delivered in the NDP area over a period of 9 years (just 2.2 per year). This is much lower than the Core Strategy envisaged. The Core Strategy Examining noted concerns from local residents but concluded the level of planned delivery would not represent an unsustainable level of growth with an annual average closer to 10 new dwellings per annum. Therefore, taking into account past housing delivery rates, it is important that sufficient sites are identified in Robertsbridge to ensure local housing needs are provided for during the plan period. Figure 31 also needs to be amended to clearly reflect the local plan development strategy and the proportion of growth directed to each settlement.

In response to Question 70, these representations set out evidence on the suitability of a medium sized site for housing at Land north of Northbridge Road (HELAA SAL0024).

70. What are your views on the potential sites identified in the draft HELAA that could accommodate more growth in Northern Rother?

The Council sets out a shortlist of sites in the plan drawn from the HELAA. However, it is considered that there are a number of further good site options which should have been included following further rigorous assessment but have been discounted. Homes England has acquired and now controls both Hodson's Mill (HELAA Ref SAL003) and the adjacent land to the north identified in the HELAA (SAL0024). HELAA site SAL0024 Land 'North of Northbridge Street, Robertsbridge' should have been included as it is suitable, available and achievable. In responding to question 70 we set out below the justification for including site SAL0024 in the HELAA. This response should also be read alongside Appendix A (Review of HELAA appraisal SAL003 & SAL0024) and Appendix C (Landscape Statement) of this response which sets out further detail in response to the council's site assessment.

Our assessment for HELAA Site SAL0024 deals in turn with the points of concern raised by the assessment. We draw on technical assessments prepared in support of the adjacent consented scheme (Hodson's Mill – HELAA SAL003) and further technical landscape assessment prepared in support of the combined sites.

- the effect on the National Landscape (High Weald AONB)
- harm to the significance (specifically 'setting') of the Conservation Area

In overview, as our assessment concludes, this is a deliverable c. 2 hectare greenfield site with very few physical constraints, which provides an adjacent location to the housing-led regeneration of Hodson's Mill in an accessible and walkable location. In short, we believe it is a sustainable location for further housing, complementing the Hodson's Mill redevelopment.

The topics of concern set out in the HELAA for site SAL0024 were landscape and heritage impact, and site accessibility which are addressed in turn below.

Landscape & Heritage Effects

The landscape and Visual Impact Assessment which supported the Council granting planning permission for the Hodson's Mill scheme confirmed how a landscape led approach mitigated adverse impacts on the surrounding landscape and AONB. A further Landscape Assessment¹³ has also been prepared by The Environment Partnership in relation to Hodson's Mill (HELAA SAL003) and land north of Northbridge Street (HELAA SAL0024). Together these demonstrate that, in fact, the land has moderate capacity for development and that, sensitively delivered, it would conserve and enhance landscape and scenic beauty of the National Landscape (High Weald AONB).

The HELAA assessment *considers development may be a diversion from the historic ribbon form of settlement and harmful to the Conservation Area's setting.*

A Heritage Statement¹⁴ was submitted with the Hodson's Mill Site planning application (RR/2017/382/P) which evaluated the significance of the Conservation Area, with consideration of the Conservation Area Appraisal. This did not identify the linear pattern of the settlement as an attribute of importance in the Conservation Area's significance, and moreover the Council should consider that approved scheme would itself fundamentally change the setting of the site and that part of the Conservation Area. SAL0024 would sit behind new development (in depth) and its presence would be largely filtered by mature landscape screening (including trees) along respective field boundaries.

The approval of the Hodson's Mill regeneration demonstrates development of SAL0024 is achievable without significant effects on either the Conservation Area or the designated asset within the Mill Site. The 2024 Landscape Statement affirms this, concluding that with due attention to the scale and design of development it will not harm the setting of the Northbridge Street Conservation Area, retaining views south across the wider landscape.

Accessibility to Services

By way of the approved Hodson's Mill scheme that site would be connected to the village and provide pedestrian connection to the existing footways linking to the village. The Council's 2024 draft HELAA assessment states that site SAL0024 is *"some distance from services in Robertsbridge"* but the site is in fact well located, with all the necessary facilities and services offered in Robertsbridge via a safe and accessible route. The site is within 800m (see Appendix A for detailed mapping) of all the qualifying facilities listed in draft policy LWL2 meeting its highest accessibility standard. The walking and cycling route into the High Street is safe and suitable, with partially lit, metalled paths, along a low speed road.

This demonstrates excellent accessibility of HELAA sites SAL003 and SAL0024 to key services and facilities for which Robertsbridge is very well provided. The village is the only one to benefit from both primary and secondary schools and has above average public transport links.

¹³ Hodson's Mill Landscape Assessment, The Environment Partnership, July 2024.

¹⁴ Hodson's Mill Heritage Statement, AAD Architects/Rapleys LLP, February 2017.

It is therefore considered that SAL0024 is a deliverable site which would assist it the Council meeting (more of) the identified Local Housing Need. Homes England are committed to working with the Council to provide any additional evidence in support of the sites moving forwards.

71. What are your views on a potential 30-year vision for the A21 transport corridor?

The draft plan identifies longer-term objectives for the delivery of improvements to the A21 transport corridor including bypasses to Filmwell and Hurst Green and that these have the potential to unlock further growth options beyond the draft local plan period.

Notably, there is significant uncertainty regarding the delivery of a longer term (30 year) vision for the A21 corridor. The key consideration for the council is to provide for local housing need (derived from the standard method) during this plan period.

To effectively address standard method local housing need there is a need for the Council to identify a sufficient supply of housing sites over the plan period 2020 – 2040 and not to look to future periods. Growth should be directed to the most sustainable settlements, including villages like Robertsbridge to support their vitality and role, which is located along the A21 corridor, as they exist now.

76. What are your views on the district-wide development potential for the Local Plan up to 2040 which is presented in 4, 35 and 36?

Paragraph 5.97 states that the total amount of development in the draft plan includes sites allocated in Neighbourhood Plans and sites identified for housing in the HELAA that are known to be available.

At the upper end of the range the proposed development strategy would only provide for approximately 50% of LHN calculated in accordance with the standard method. NPPF paragraph 60 says the local plan should meet as much of the plan area's local housing need as possible. The draft plan does not currently include all sustainable site options in Northern Rother such as within Robertsbridge that reasonably deliverable during the plan period.

Figure 35 sets out the locations where there are opportunities for growth by parish area. Homes England support the identification of Salehurst and Robertsbridge as a location offering greater opportunities for growth which is also supported by a Neighbourhood Plan. Figure 36 sets out the proposed level of growth in the district by parish which includes a range of 178 – 305 dwellings in Robertsbridge. Homes England's response to question 70 demonstrates that HELAA Site SAL0024 is suitable, available and achievable and should be included within the local plan housing land supply.

The draft Local Plan and assessment of district wide development potential does not justify the low level of growth currently identified by the draft plan.

Conclusions on Responses to Consultation Questions

Through the preparation of the Local Plan, there is a need for the Council to plan positively to deliver sustainable development and housing growth in Rother District. Its Plan needs to be aspirational but deliverable. Presently, however, it would not meet a significant part of the identified overall housing need (via the Standard Method) or Affordable Housing needs (established by the Council's own evidence).

At this stage the significant shortfall of proposed housing delivery is so far below meeting requirements for Rother that it would leave the draft plan's Vision and objectives unmet and its strategy failing to meet a significant proportion of local housing need. The Council must leave no stone unturned in rigorously examining all reasonable alternative development strategies and find strategies and site options to meet as much of the identified housing need as possible.

Homes England support the approach of directing growth to the most sustainable settlements first, which is supported by the Council's Settlement Study and Development Strategy background paper. However, the draft development strategy doesn't reflect the proportion of development that can be accommodated in the other sustainable locations such as the rural service centre of Robertsbridge. This settlement benefits from a good range of services and facilities, excellent transport connectivity and good site options that relate positively to the character of the village and surrounding landscape. The draft Local Plan currently fails to demonstrate that a higher level of housing cannot be delivered and particularly in the most sustainable rural settlements such as Robertsbridge. The Council needs to undertake further (finer-grained) assessment of land availability, including presently discounted site options (like HELAA site SAL0024) mindful these can also support the role of the settlement and the vitality of its rural community.

The regeneration (housing-led) of the former Hodson's Mill site is supported by its allocation in the Neighbourhood Plan, a significant consideration. The Council identified, through granting planning permission, the benefits of those proposals, including that the public benefits outweighed *less than substantial harm*. The planning application noted it was submitted on the back of strong community support. The scheme provided the following benefits:

- Regeneration and remediation of a long term redundant (2004) brownfield site
- Replacement by a high quality, context sensitive mixed-use scheme with;
- A mix of 96 new homes to meet local housing needs in the village and surroundings
- 1,200 sqm of A3 and B1, greatly exceeding previous job-generation from the site
- High quality Publicly accessible space, including new attractive parkland and amenity walks, connectivity to PRow

Through the development of additional land adjacent to the Hodson's Mill site (HELAA site SAL0024) there would be further significant benefits that should be taken into account including;

- A high quality, landscape led, and sensitively designed scheme of housing in a sustainable location
- A mix of 40-60 further homes, including Affordable Housing tenures for rent and ownership including First Homes on the site in line with the emerging policies.
- Additional public open space and connections to the PRow recreational network
- Construction phase employment
- Additional income investment from additional population to support the village's many services, facilities and schools.

These representations provide a compelling case for the inclusion of 'Land North of Northbridge Street (SAL0024)' which is sustainably located and accessible to a broad range of key facilities. In conjunction with the Hodson's Mill site, there is an opportunity to deliver a sustainable development that respects

settlement character and setting of the AONB and Conservation Area. The modest site takes the opportunity to help sustain and enhance the vitality of services and Robertsbridge to “grow and thrive”.

Homes England’s objectives seek to unlock housing and act as a catalyst for housing delivery. We promote innovation, ensure homes are safe, and drive sustainable communities. We are therefore well placed to be able to support Rother District Council in meeting it’s housing need within the Plan period on the site’s identified within these representations.

Homes England looks forward to engaging further with the Council as the Plan progresses and will support the reassessment of site options mentioned in Robertsbridge including Hodson’s Mill and adjoining land.

APPENDIX A – Review of HELAA appraisal SAL003 and SAL0024

The council's draft site HELAA site assessment for SAL0024 is as follows:

“This is an open field adjacent to the former Mill site, a large brownfield site which is allocated in the Neighbourhood Plan for residential development and which has planning permission for 96 dwellings. This site forms part of the rural setting of the village and will form the rural setting to the Mill site development when that comes forward. Further development here would represent encroachment into the National Landscape countryside and would not be in character with the existing settlement pattern. Further expansion around Northbridge Street would not be in character with the historic ribbon form of settlement and would be harmful to the setting of the Conservation Area. The site is also some distance to services in Robertsbridge”.

Our assessment specifically evaluates the points of concern raised by the council's draft HELAA drawing on technical assessments prepared in support of the adjacent consented scheme (Hodson's Mill – HELAA SAL003) and further technical work prepared in support of the wider site. Illustrative master planning has been prepared to test the site's suitability as a concept plan. This demonstrates the potential for a sensitively designed residential development appropriate to the landscape and conservation area setting of Robertsbridge. Further work will be undertaken to devise the masterplan, through extensive consultation with the Local Authority, Parish Council, local community and Statutory Stakeholders as part of the design process.

Suitable site access to the Hodson's Mill site (HELAA SAL003) including adjoining land North of Northbridge Road (HELAA SAL0024) has been established through planning consent¹⁵. In granting the permission the Council concluded there was safe access in highway terms and that there will be no severe residual cumulative effects on the road network.

The area benefits from flood defences (broadly opposite the Hodson's Mill site access). These are owned and managed by the Environment Agency and were installed in 2003¹⁶. They comprise “1,160 m of earth embankment, 680 m of floodwalls and 430m of river realignment to protect the northern, central and southern parts of the town from river flooding”⁴. The adjacent land covered in SAL0024 is Flood Zone 1, and therefore at a low risk.

Development on SAL0024 would be accessed via the previously consented (and Neighbourhood Plan allocated) Hodson's Mill site and its main access, which is within higher flood zones. The planning permission for the adjacent Mill site established that both sequential and exception tests were passed for that scheme, and that safe access even during extreme flood events could be provided (via a secondary emergency access to the north). This would also serve development in SAL0024. The EA management plan⁴ confirms that it is important that there is no increase in surface water run-off from new development and opportunities to reduce run-off should be explored. Development on SAL0024 would create a positive drainage situation, whereby in extreme storm events SuDS attenuation would assist in holding and releasing surface water run off at the ordinary greenfield rate.

Landscape and Heritage Effects

The Council's HELAA site assessment identifies the following points relating to landscape and heritage. SAL0024 site is within the High Weald National Landscape but is outside of the Robertsbridge Conservation Area:

¹⁵ RR/2017/382/P

¹⁶ Environment Agency Rother and Romney Catchment Flood Management Plan

“Further development here would represent encroachment into the National Landscape countryside and would not be in character with the existing settlement pattern”.

“Further expansion around Northbridge Street would not be in character with the historic ribbon form of settlement and would be harmful to the setting of the Conservation Area”.

The HELAA assessment does not appear to have considered the context of the consented redevelopment effects from the Hodson’s Mill development, or the historic arrangement of the Mill site. Full planning permission granted consent for a comprehensive layout of 96 homes, has already been accepted by the Council. An extract of the approved scheme layout (Fig 1 below) shows how development will retain and supplement heritage assets with new development, including three storey housing rising up the site to form the northern edge of new streets ‘The Stray’ and ‘The Avenue’.



Figure 1 – Approved Scheme Layout & Illustrative View, Hodson’s Mill ref: RR/2017/382/P

A Landscape and Visual Impact Assessment¹⁷ supported the planning application for the Hodson’s Mill development. This confirmed the ‘landscape led’ approach and proposed landscape framework plan which informed the scheme had mitigated adverse impacts and enhanced the landscape resource. Without any mitigation, the LVIA predicted a negligible adverse effect to the High Weald AONB landscape character (due to site characteristics and scale of the character area). With mitigation all visual effects were also reduced – including moderate / substantial adverse impacts along Northbridge Street – to a range between negligible adverse to moderate beneficial.

Pivotal to this were the principles of mitigation which included (LVIA pp35);

- A landscape framework with a robust and comprehensive green infrastructure network to strengthen existing pockets of vegetation and punctuate the blocks of development with vegetated corridors;

¹⁷ Hodson’s Mill, Landscape and Visual Impact Assessment, The Urbanists, February 2017.

- Structural planting at the development boundaries to strengthen existing vegetation and provide new screening to mitigate a number of potential views from sensitive receptors;

The Council’s committee report observed;

“6.8.3 ... The development would not be wholly concealed and there would be views of the new buildings in the wider landscape, particularly where the ground levels rise in the northern part of the site)...” but existing and new trees would “soften the visual impacts of the development...”

Furthermore, through design and reducing the density of development and quantity of hard surfacing impacts were recognised to have been mitigated including avoiding a ‘hard-edge to development’ and suburban character. Concluding, officers recognised that;

“6.8.5 Over 80% of the district lies within the designated High Weald AONB and this includes the whole of Robertsbridge village and surrounding landscape....any development around the edges of the village will have some impact on its countryside setting and may affect the landscape character and quality of the AONB to a degree. [These] have to be considered against the recognised need expressed in the adopted Core Strategy and the SRNDP allocation to meet the housing requirements for Robertsbridge.”

A further Landscape Statement¹⁸ has also been prepared by The Environment Partnership in relation to Hodson’s Mill (HELAA SAL003) and land north of Northbridge Street (HELAA SAL0024). The LVIA and Landscape statement demonstrate development can be accommodated on the adjacent land behind Hodson’s Mill site while conserving and enhancing landscape and scenic beauty of the AONB and the preserve the setting of the Conservation Area. The Landscape Statement submitted with these representations describe the two fields that make up SAL0024 as Parcel C and D. It notes they share similar characteristics and form part of a rising valley landscape from Hodson’s Mill, and that the Council’s landscape assessment concludes they have a moderate capacity to accommodate residential development. It concludes that there is capacity, with appropriate landscape mitigation measures and master planning, for development on SAL0024 provided it avoids expanding into the higher contours of the site.

Further mitigation to ensure an appropriate design response that minimises effects on the AONB and setting of the Conservation Area include:

- Landscape led solution for the reuse of a derelict brownfield site, with its former mill.
- Built form sympathetic to the topography and working in a co-ordinated manner with a substantial landscape framework and retain existing views south across the wider landscape.
- development limited in height on the valley slope to on the lower/mid slopes of the fields and limited to 2 storeys to respect the landscape setting and avoid breaching prominent views of the landscape ridgeline.
- Use of bespoke, lower-scale built form (bungalows/dormer bungalows) and architectural styles that reflect local vernacular design to assist in respect the character and settlement pattern of Northbridge Street Conservation Area Structural planting at the development boundaries will strengthen existing vegetation and provide new screening to mitigate a number of potential views from sensitive receptors.
- Enhancing established landscaping further through new areas of woodland planting (e.g. gap planting) along the northern site boundary.
- Maintaining a northern buffer of POS / green infrastructure with substantial opportunities for planting.

¹⁸ Hodson’s Mill Landscape Statement, The Environment Partnership, July 2024.

- Avoiding or significantly limiting external lighting to maintain dark skies in the High Weald National Landscape.

A sensitively designed scheme will conserve and enhance the special qualities of the National Landscape (High Weald AONB). Both parcels are well enclosed by mature vegetation and offer potential for low rise housing provided it is confined from the higher slopes (to the northern parts of each parcel) and limited to 2 storeys in height. We therefore consider that sensitively planned and designed development could conserve and enhance the setting of the conservation area and the special qualities of the High Weald AONB.

Heritage Impact

Turning to the stated potential for impacts to heritage significance in the Council's (HELAA) appraisal it is again worthwhile returning to context, particularly when considering the settlement pattern for Robertsbridge/Northbridge Street. A Heritage Statement¹⁹ was submitted with the Hodson's Mill Site planning application (RR/2017/382/P). This demonstrates development of SAL0024 is achievable without significant effects on either the Conservation Area or designated asset within the Mill Site. In consulting the Historic Environment Record, ASE's assessment observed that the southern part Hodson's Mill is in the Conservation Area; the remainder of that scheme/site is outside and provides the immediate setting. Land within SAL0024 also does not perform the same role as the northern part of the Mill Site.

The Council's Conservation Area Appraisal²⁰ (CAA) does describe Robertsbridge, and Northbridge Street (character area 5) as being primarily/principally linear. It does not set that out to be a characteristic of particular importance or influence to the Conservation Area's significance, however. This is seen further in the assessment of impacts from the Mill Scheme. The majority of the approved Hodson's Mill Scheme would be developed behind the Grade II Oast House and non-designated Mill, forming development in depth and modified setting for the Conservation Area. Despite this the ASE study found there would be "*less than substantial harm*" to the Conservation Area.

This is because, per ASE's conclusions, the scheme "*would not unduly compromise elements (identified in the CAA) that make an important contribution*" and the "historic ribbon form" is not one of those. Indeed, where ASE reflected in the Heritage Statement that landscaping design in the scheme could have gone further to comprehensively screen the Mill Site proposals from the Conservation Area it should instead;

"...aim to strike a balance between providing adequate screening of new housing development within the broader landscape, and the desirability of maintaining the views of the mill building."

The Council's committee report agreed with the degree of harm identified and raised no objections/concerns about the scheme departing from the settlement's morphology or pattern of development.

¹⁹ Hodson's Mill Heritage Statement, AAD Architects/Rapleys LLP, February 2017.

²⁰ Robertsbridge and Northbridge Street Conservation Area Appraisal, September 2009.

The appended 2024 Landscape Statement which supports this submission concludes that with due attention to the scale and design of development will be able to respect the character and settlement pattern of Northbridge Street Conservation Area and retain existing views south across the wider landscape.

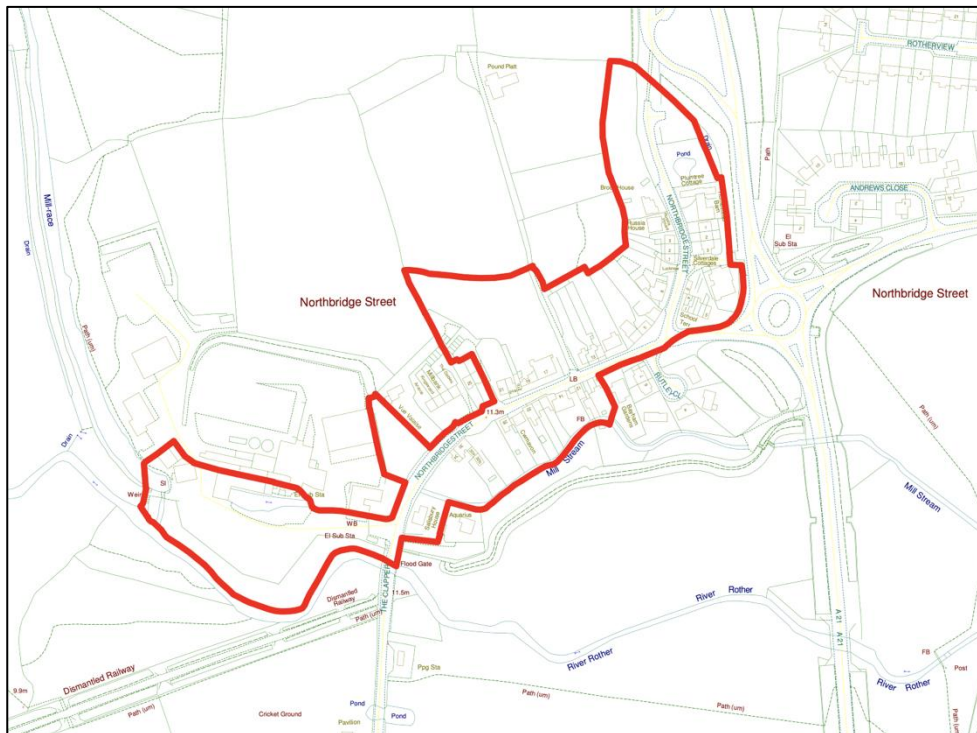


Figure 3: Extract from CAA, extent of Conservation Area (red outline)

Supplementing the Hodson’s Mill site scheme with sensitive development of HELAA site SAL0024 would not therefore be likely to lead to inconsistency with the perceived character or pattern of the settlement and impact on the significance of the Conservation Area. Despite this, it is also clear that a comprehensive ‘landscape led’ approach to the development across the two sites (SAL003 and SAL0024) would also provide significant mitigation and delivery of high-quality, sustainable development.

Accessibility to Services

The Council’s 2024 draft HELAA assessment concludes that site SAL0024 is “*some distance from services in Robertsbridge*”. That is not the case. The draft Local Plan sets out in policy LWL2 the Council’s expectations for locational sustainability, and we provide comments to those in response to Questions 30, 31 and 32 (Section 4) within Appendix B. This sets different expectations dependent on the scale of settlement involved, with lower expectations for villages like Robertsbridge. Despite this, all of the qualifying facilities listed by the draft policy (and further additional facilities) are within 800m of the site access to SAL003 and SAL0024, meeting expectations for the largest settlements. This is shown by Table 1 and Figure 3 below.



Figure 3 - Location of Key Facilities

The number and quality of facilities and services, moreover, make walking and cycling to the village centre worthwhile and they are linked to the site by way on a route that;

- Is comprised of suitable footways
- A mostly lit and surveilled route
- Not severed by high speed traffic or road design
- Offers a pleasant low speed environment
- Is mostly flat, and does not dissuade walking

The identified facilities are as follows:

Number	Service	Description / Distance
1	Railway Station	Robertsbridge station is located 600m to the southwest of the site
2	Convenience Food Store and Post Office:	The convenience store and post office is 650m from the site. The shop sells a good range of product including fresh fruit and vegetables.
3	GP Surgery	Oldwood Surgery is 800m from the site
4	Dentists	The dental surgery is 480m from the site
5	Pharmacy	The Boots pharmacy is 480m of the site and within 10 minutes walking time.
6	Osteopathic Clinic	The Osteopathic clinic is 640m from the site.

7	Bakery and Café	The bakery and café is 480m of the site. This provides a convenient indoor meeting place.
8	Browns Farm Shop	The farm shop is 1450m of the site.
9	Community Sport Hall	The Community Sport Hall is 1,600m from the site.
10	Village Hall	The Village Hall is 750m from the site. This also hosts a coffee shop and provides a convenient indoor meeting place.
11	Primary Education	The Salehurst Church of England Primary School is 800m from the site.
12	Secondary Education	Robertsbridge Community College is 1km from the site.
13	Recreational Areas	The Clappers Recreational Ground / Cricket Ground is 300m from the site.
14	Places of Worship	The Darvell Bruderhof Community is 1.4km from the site.
15	Public Houses	The George Inn is 640m from the site.
-	A21 Strategic Road Network	Northbridge Street is located adjacent to the east of the site providing links to the A21, to London to the north and Hastings to the south.
-	Bus Stops	The site is located within 105m of bus stops located on Northbridge Street which are served by route 1066 connecting to Hastings, Hawkhurst and Tunbridge Wells.

Table 1 – Schedule of Facilities in Robertsbridge

Therefore, SAL003 and SAL0024 *should* be considered accessible, exceeding the goals of the draft policy LWL2 in accessibility terms, themselves modelled on a high standard.

We note that Robertsbridge is also well connected by strategic transport connections with regular bus and rail services. In contrast to other settlements in Northern Rother, this provides opportunities for commuting, access to additional services. The services and facilities located within Robertsbridge are relied upon by other nearby settlements. All of this makes the settlement a highly sustainable location where, per NPPF83, the Council should seek to promote housing delivery to “enhance or maintain the vitality of rural communities” and provide opportunities for Robertsbridge “to grow and thrive” and support villages nearby.

Conclusion

The Council’s review of site SAL0024 is incomplete, and the site should not have been discounted from the HELAA. There are compelling material considerations that indicate the c. 2ha site can indeed be relied upon to deliver additional homes at an appropriate scale and character to reflect the qualities of the National Landscape and conserve the significance of the Conservation Area. Against that are the benefits the site can deliver, chief amongst those is enabling the Council to ‘get closer’ to meeting its standard method derived housing requirement. In addition a further residential scheme on the site has the potential to capitalise on all of benefits which Robertsbridge has to offer as a sustainable settlement, and deliver:

- A high quality, landscape led, and sensitively designed scheme of housing in a sustainable location
- A mix of new homes, including Affordable Housing tenures for rent and ownership including First Homes on the site in line with the emerging policies.
- Additional public open space and connections to the PRoW recreational network
- Construction phase employment
- Additional income investment from additional population to support the village’s many services, facilities and schools.

**APPENDIX B - Summary of Development Strategy Alternative Options
(Development Strategy Background Paper)**

Spatial Development Option (SDO)	Description / Vision	Focus for Growth in Settlements / Areas of Built Form
SDO1: Village Clusters	A cluster of villages that are connected with each other to form a sustainable community. Two clusters identified centred around Rye and Battle as key transport and service hubs.	1) Rye Cluster – Rye, Camber, Northiam, Playden, Iden, Rye Harbour, Winchelsea, Winchelsea Beach, Peasmarsh, Broad Oak, Beckley, Northiam, Broad Oak/Brede, Udimore. 2) Battle Cluster – Battle, Crowhurst, Sedlescombe, Catsfield, Catsfield Stream, Whatlington, Mountfield, John’s Cross, Netherfield.
SDO2: Radial settlement network connected to Bexhill and Hastings	A radial network of smaller settlements connected to the facilities and services of Bexhill and Hastings to create sustainable communities.	Bexhill network: Crowhurst, Catsfield, Lunsford Cross, Normans Bay, Hastings network: Hastings fringes (Rock Lane and Austen Way, Chowns Hill and Ivyhouse Lane, Westfield Lane, Bachelors Bump, Friars Hill, Woodlands Way and Parkwood Road), Sedlescombe, Westfield, Guestling Green, Icklesham, Three Oaks, Pett and Fairlight
SDO3A: Bexhill Greenfield Growth Option 1 – existing network	Development on the edges of North and West Bexhill that creates new compact, connected communities, or additions to Sidley or Little Common, accessed by the existing transport network.	North and West Bexhill. The quantum of development that would be acceptable would be tested through landscape, sustainability and transport assessment. A Bexhill-wide place-making strategy would be required to successfully integrate new development.
SDO3B: Bexhill Greenfield Growth Option 2 – new multi modal corridor.	A higher level of growth in North and West Bexhill through new sustainable communities that are masterplanned, accessed and served by a new multi-modal transport corridor between the A259 and the A2691 (Haven Brook Avenue). Opportunity to remove through traffic and potentially reallocate road space in Bexhill for shared and active transport.	North and West Bexhill, with the development of new sustainable communities which links to and provides greater accessibility to community facilities and services in the wider Bexhill area. Mixed use development with a potential range of residential development from 1,500-5,000 dwellings
SDO4: Sustainable Settlement Growth	Prioritise new development on the edge of sustainable settlements, providing major development and extending settlement boundaries where appropriate.	On the edge of settlements that score highest with regards to sustainability in the Settlement Study: Bexhill, Rye, Battle, Robertsbridge, Ticehurst, Northiam and then smaller growth for other settlements.
SDO5: Hastings Fringes Urban Growth	Development on the edge of Hastings in sustainable locations, which may provide opportunity for joint delivery of sites by Hastings BC and Rother DC.	On sites around Hastings Fringes, , accessed from The Ridge, Queensway, Hastings Road, Stonestile Lane, Ivyhouse Lane, Rock Lane, and Rye Road.
SDO6: Brownfield	Development within the existing areas of built form, focusing on brownfield development at higher densities.	Larger settlements, but principle applies to all settlements, but with different scales and opportunities.

development		
SDO7: New rural settlement(s)	Opportunity for (a) standalone settlement(s), with the provision of facilities and services to ensure sustainability.	No specific locations have been identified, but in principle this would include around 1,000-2,000 dwellings in a new settlement.
SDO8: Proportional growth across the District (by population)	Proportional distribution of development based on the current population of each settlement.	50% of development in and around Bexhill, with proportionate growth in Rye and Battle and the larger villages of Robertsbridge, Northiam, Ticehurst, Westfield and Burwash for example.
SDO9: Proportional growth by settlement form and function	Proportional distribution of development based on the order of the settlement in the network of settlements (service centre or hierarchy approach which does not take account of constraints)	Bexhill, Rye and Battle, and then lower order settlements as identified in the Settlement Study.
SDO10: A21 Corridor growth, focus on creation of sustainable transport corridor	Development along the A21 within an identified corridor of settlements, with opportunities for growth. Opportunities for sustainable travel through enhanced bus services and cycle track along this corridor.	The following settlement areas south to north: Hastings Fringes/The Ridge, Kent Street, Sedlescombe/Blackbrooks/Marley Lane, Whatlington, Vinehall Street, Johns Cross/Mountfield, Robertsbridge/Salehurst, Silverhill, Hurst Green, Swiftsden, and Flimwell.
SDO11: Growth in settlements with train stations	Development around train stations in settlements served by them.	Bexhill (Cooden Beach, Collington and Central), Normans Bay Crowhurst, Battle, Robertsbridge, Etchingham, Stonegate, Three Oaks, Rye.
SDO12: Outside AONB	Development only outside the High Weald AONB, which would result in a coastal development strategy including Bexhill and Rye.	Bexhill and its edges, Normans Bay, Catsfield (southern section), some areas of Hastings Fringes/Westfield Lane, Rye, Rye Harbour, Playden, Winchlesea Beach and East Guldeford.

APPENDIX C – Landscape Statement (The Environment Partnership, July 2024)

Appendix D – Site Boundary (drawings 13347-CRH-XX-26-FG-G-7003 – P1)