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Our ref. PL010/744/CD/HR

Planning Policy Team
Rother District Council

By email only:
draftlocalplan@rother.gov.uk

Dear Sir/Madam

ROTHER DISTRICT COUNCIL – LOCAL PLAN REGULATION 18 CONSULTATION 2026

REPRESENTATIONS ON BEHALF OF MS AMY HEDGES LAND EAST OF HOP GARDENS, NORTHIAM ROAD, STAPLECROSS AND LAND SOUTH OF WATTS WOOD, STAPLECROSS

On behalf of my client, Ms Amy Hedges, I write to make submissions to the Rother District Regulation 18 Local Plan consultation. My client has control over land east of Hop Gardens, Northiam Road, Staplecross and Land South of Watts Wood, Staplecross both which have been assessed under the Council's Housing and Economic Land Availability Assessment (HELAA) under references EWH0009 and EWH0018.

These representations relate in particular to the following parts of the Regulation 18 document, titled Rother Local Plan 2025-2042:

- Housing Need
- Preferred Spatial Development Options
- Relevant Draft Local Policies

A site plan outlining the land promoted for development is included at **Appendix 1**. The land put forward for consideration is edged in red.

Housing Need

The key objective to significantly boost the supply of housing remains a focus of planning policy at all levels. Paragraph 61 of the NPPF states that to support this aim it is important to ensure a sufficient amount and variety of land can come forward where it is needed.

In addition, paragraph 11b of the NPPF states:

'Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:



- i. *the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area;*

or

- ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.'*

The Regulation 18 consultation identifies the housing need in the district as 15,504 homes for over the plan period 2025 to 2042. This figure was derived using the Standard Method, as required by the NPPF and accompanying Planning Practice Guidance (PPG). This amounts to 912 dwellings per annum. It is not clear from the Regulation 18 consultation whether this figure includes a 20% buffer to be applied as a result of under delivery as set out at paragraph 78 of the NPPF. If the 20% buffer has yet to be applied, housing requirement would increase to 1094 dwellings per annum -18,598 dwellings over the plan period.

In any event, the Council have confirmed they do not in fact intend to meet their full housing need (as calculated by the standard method) for a number of reasons most notably the significant landscape, flooding and heritage constraints which exist across the district. We accept that footnote 7 of paragraph 11 of the NPPF allows for a reduction in housing delivery in areas restricted by certain designations, including National Landscape, of which a significant part of the Rother District falls within. However, we do not consider the lower housing figures offered in the Regulation 18 Consultation have been justified or that sufficient reason has been given for not meeting the higher housing need figure required by the standard methodology. The history of under delivery of housing since the adoption of the Core Strategy is well documented (as set out paragraph 3.3 of the Regulation 18 Plan) which makes all the more pressing case for the Council to be taking a more radical approach to positively plan for a higher level of housing.

The Council have made a passing reference in the Regulation 18 plan to a few reasons as to why they cannot meet their housing need figure calculated using the standard methodology including:

- Landscape constraints
- Constraints resulting from areas lying within flood zones
- Heritage Assets
- Internationally and nationally designated habitats sites, covering roughly 7 per cent of the district, that must be conserved.
- Highest proportion of ancient woodland (compared to land area) in South-East England.

Beyond a passing reference to the above constraints, the Council has not set out in detail why they cannot meet their full identified housing need. We would note that under the previous Regulation 18 Consultation heritage assets and the extent of ancient woodland in the district were not cited as reasons for limiting the level of housing to be provided. It is unclear as to why these are now considered to be constraints on the level of housing that can be developed. In our experience of development sites, heritage assets and ancient woodlands are usually constraints that can be worked around with appropriate buffers/mitigation and design so we

do not consider them to be a constraint on the quantum of development that can be delivered across the district.

Our clients land at Staplecross would not be constrained by the flooding constraints cited by the Council as reason to not meet full identified housing need being entirely within flood zone 1. Whilst there are listed buildings within the vicinity of the site, as will be set out below, these are not considered to be a constraint to the development of the site. Similarly whilst there is ancient woodland adjacent to the northern boundaries of the site, the required buffers will not significantly impact the developable areas of the site.

Whilst the land is located within in the High Weald National Landscape (formerly AONB) area it is considered capable of accommodating some development without adverse effect on the natural beauty of the High Weald which underpins the designation of this area.

As highlighted in the accompanying Landscape Statement prepared by ADAS Landscape, found at Appendix 2, the site bears a strong relationship to the existing residential development and the settlement of Staplecross and is strongly enclosed to the north by the Ancient Woodland of Watt's Wood and Bowling Alley Wood, which negate further wider impacts on the wider High Weald National Landscape. As highlighted in the proposed landscape strategy there is opportunity here to enhance and reinforced the boundary between the new settlement edge and the wider landscape to the north and east of the site, through the introduction of a strong vegetated boarder.

As highlighted in paragraph 4.1.4 of the Landscape Statement the HELAA noted 'the site forms an important gap in ribbon development along Northiam Road, contributing to the rural character of the village' However at this point within the village, semi-detached residential properties line the road frontage along the southern edge of Northiam road, providing the sense of continuous settlement. As such the existing settlement of Staplecross is not currently clearly defined on the northern or eastern edge and development of the site offers the opportunity to implement a robust landscape strategy that will create strong and clearly defined edges to the settlement that are recognisable on the ground, utilising the existing enclosure provided by Bowling Alley Wood and Watt's Wood, will extend and enhance the habitats and character of the AONB, in line with Policy EN1: Landscape Stewardship.

Footpaths within the vicinity of the land provide access to a range of facilities within Staplecross. Bus stops within walking distance of the site provide services to Hastings which has a full array of day-to-day services including a train station providing services to London amongst other locations. The proximity of the site to the Staplecross Recreation Ground provides additional opportunity for increasing access from the existing settlement of Staplecross to the wider countryside, by connecting the Recreation Ground, through the site, to PRoW EWH/24/.

Paragraph 73 of the NPPF recognises that small scale developments can deliver housing at a faster rate. The land is owned outright by Ms Hedges and so there are no third party ownership issues which might prevent or delay development. It is anticipated that a small-scale development here could be delivered at a relatively quick rate.

In accordance with the Government's objective of significantly boosting housing supply we contend the Council should pursue a higher growth strategy to fully meet the full identified housing need for the plan period. Adopting this approach will allow the Council to develop a long-term sustainable growth strategy which provides flexibility to adapt to changes in

demand and allow for the inevitable cases where development does not come forward for some reason or under delivers. This is particularly the case given the history of under delivery in the district. It would also allow for a more consistent delivery rate, allowing for a wider range of smaller sites to be delivered while the infrastructure is put in place to serve larger developments.

Proposed Strategy: Overall Spatial Development Strategy

The Regulation 18 draft local plan identifies a number of spatial strategies across the district to respond to different circumstances, including some additional development within Staplecross.

We support the principle of employing a number of spatial strategies to provide the flexibility to respond to differing circumstances and as a village with some services and connectivity to higher tier settlements Staplecross makes a logical focus for additional growth.

Vision for Northern Rother

The vision for Northern Rother indicates that:

Northern Rother's rural settlements and communities will continue to thrive, through sensitive residential development and growth in villages to create sustainable forms of development with a strong emphasis on protecting the landscape character and scenic beauty of the High Weald National Landscape.

Figure 26 sets out the level of proposed development across the settlements in Northern Rother and indicates allocations for 33 dwellings in Staplecross indicating that Staplecross is considered to be a suitable location for additional growth. We support this view of the Council.

Policy SC2

Policy SC2 sets out the proposed allocation of a proportion of our client's land for residential development for 8 dwellings. The proposed allocation indicates that the Council are looking for a small proportion of our client's land that lies to the east of Hop Gardens to be developed. We support the principle of allocating our client's land for development but contend that consideration should be given to increasing the extent of land that is proposed for allocation. There are a number of reasons for this.

Firstly, as legislation currently stands the development would be required to provide Biodiversity Net Gain (BNG) and therefore there needs to be sufficient land allocated to enable on-site BNG provision. If the density of development seen in the Hop Gardens is followed the current area of land proposed for allocation would provide no space for on-site BNG. A connected point to this is that we note that the Council suggest that development should be limited to the western portion of the land they are allocating thus further restricting the developable area of the allocated site and increasing the need to expand the overall allocated area to enable the proposed quantum of development to be delivered.

Secondly, current policy requirements would necessitate the provision of 3 affordable units on site. It is well known in the development industry that in recent years the finances of registered affordable housing providers (RP's) have become significantly more restrained and with the need to bring their existing housing stock up to standard the finances available for RP's to invest in new stock is more limited. As such it has become increasingly difficult to attract RP interest in development sites and where they are investing in new units they are focusing on the purchase of higher quantum of units in a single site to enable simplified

management of units. Our development surveyor colleagues who regularly deal with the promotion and sale of development sites have direct experience of this and have experienced delays in the sale of development sites where in excess of 10 affordable housing units have been required to be provided on site due to difficulties in finding an affordable housing provider willing to take the affordable housing units on. It is therefore unlikely that the proposed quantum of development would result in the provision of on-site affordable housing units. By extending the extent of land that is allocated for development and therefore the quantum of development and affordable units the potential for affordable units to be provided on site will be increased.

Finally, as indicated above the overall level of allocations in the Regulation 18 Consultation Plan continues to fall short of the identified housing need in the district and therefore we would contend that where appropriate the Council should seek to maximise the land they allocate for development. In this respect our client would contend that by allocating the entirety of the land outlined in red in **Appendix 1** there is scope to provide a larger scale development that contains a range of densities to enable a transition between the existing built up area and the surrounding countryside. In terms of impact on the wider High Weald National Landscape the Council are proposing to allocate the land which has the highest topography for development so arguably are already proposing to allocate the land which has the highest visibility in the wider landscape. We would contend that expanding the allocation to include land to the north would not significantly increase the visibility of the development in the wider landscape. This is particularly the case as the existing ancient woodland to the north assists in enclosing the site. Whilst we would maintain that the entirety of the land outlined in **Appendix 1** should be allocated, as a minimum we would suggest that consideration is given to extending the allocation to be in line with the northern boundary of the recreation ground. Extending the allocation to this extent would provide a site which has boundaries consistent with the extent of the recreation ground and Sheringham Close to the west of the recreation ground.

Development Boundaries

The regulation 18 consultation plan indicates that existing development boundaries will be reviewed as part of the Local Plan process. The review will however be limited to amending development boundaries to reflect proposed site allocations that are within or at the edge of existing settlements. We would agree with this approach.

The development boundary of Staplecross is currently set out in the Development and Site Allocations Plan (DaSA), as included in **Appendix 3** and currently abuts our client's land to the west. It is considered that our client's land makes a logical extension to the development boundary for Staplecross to allow for more housing growth.

Site Specific Considerations

The submitted land identified at **Appendix 1**, lies on the outskirts of Staplecross which has been identified as a settlement capable of accommodating additional housing growth.

Staplecross has been identified in the Regulation 18 Consultation as location for additional residential development under the preferred option which seeks to focus growth in a number of core areas. Subject to site specific considerations it is therefore in a location where the Council have shown support for further development in principle.

The Council have currently indicated that they are looking to allocate a proportion of our client's land for development, however for a number of reasons as outlined above we would

contend that consideration should be given to allocating a larger extent of our client's land for development.

The land is currently vacant agricultural land which is not subject to any ecological designations. There are two parcels of ancient woodland to the north which any forthcoming scheme would maintain an appropriate buffer from.

The land does lie within the High Weald National Landscape but as referred to above site is highly contained within the wider landscape with the ancient woodland to the north providing a definitive boundary, which would prevent further expansion to the north and screens the land from the wider High Weald National Landscape. By bringing forward development in this location the wider character of the area will not be negatively impacted, and the northern edge of the settlement could be more clearly defined on the ground. The site would provide accessibility to facilities and services within the village and would not result in scattered or ribbon development as the land lies within the existing developed envelope of the village. This is in line with Policy OSS2 of the DaSA.

On the basis of a capacity of 24-45 dph dwellings per hectare (in accordance with proposed policy LWL1) if our client's entire land parcel was allocated it would be capable of accommodating up to 66 dwellings as a minimum. However, taking account of the plot sizes surrounding the site and the need to set aside areas for biodiversity net gain it is considered that a lower level of dwellings would be more appropriate, likely to be in the region of 40 dwellings.

As referred to above there is a footpath directly adjacent to the southern boundary of our client's land which provides pedestrian access to the centre of Staplecross. Staplecross has a number of facilities which are within walking distance of the site including a church, recreation grounds, bowls club, village hall, public house, village shop & post office and a primary school.

The site lies in Flood Zone 1 so is not at significant risk of flooding. As referred to above the site borders two parcels of ancient woodland to the north which appropriate development free buffers would be maintained from in any forthcoming scheme. There is an existing public right of way which cross the north-eastern boundary of the site, consideration would be had on the impact of development on this in any forthcoming scheme but in principle it is considered that with an appropriate buffer the impact on this right of way could be minimised.

Staplecross as a settlement contains a number of listed buildings. However only one of these is considered to have a visual connection with our client's land this is Brayburn Farm which is a Grade II listed building to the east of the land put forward for consideration. Any forthcoming scheme would have consideration to the impact of development on their significance and setting. As a point of principle however it is so it is considered that a scheme could be developed that would be respectful of the significance and setting of Brayburn Farm. Pertinently it is noted that the relevant HELAA assessments did not raise concerns about impact on heritage assets.

I trust that the enclosed information is clear and I look forward to receiving confirmation of receipt of this submission.

In the meantime, should you require any further information, please do not hesitate to contact me.

Yours sincerely



Christine Dadswell MRTPI

Appendix 1.

Appendix 2.





LANDSCAPE TECHNICAL NOTE

LAND EAST OF HOP GARDENS, NORTHAM ROAD,
STAPLECROSS AND LAND SOUTH OF WATTS WOOD,
STAPLECROSS

Rother District Council – Local Plan Regulation 18
Consultation 2024

On behalf of Mr Nick Hedges

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Version history

Version	Date	Amendments
1	22/07/2024	Final

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1. Introduction

1.1.1. A Landscape Technical Note (LTN) has been prepared by ADAS Landscape in relation to Land east of Hop Gardens, Northiam Road, Staplecross and Land South of Watts Wood, Staplecross both which have been assessed under the Council's Housing and Economic Land Availability Assessment (HELAA) under Site ID EWH0009 and Site ID EWH0018, considered within this LTN as a single land parcel (the 'site'). This report has been prepared in order to identify potential landscape opportunities and constraints of the site for residential development.

1.2. Objectives of this report

1.2.1. The objectives of this LVA report are to:

- Identify the relevant planning policy considerations for the site and proposed development;
- Identify the relevant landscape characteristics and guidelines for the site and proposed development;
- Identify potential visual sensitivities for the site and proposed development; and
- Identify landscape and visual opportunities and constraints to the type of development proposed within the site.

1.3. Author of the report

1.3.1. This report was written by a Chartered Member of the Landscape Institute (CMLI), who is trained and experienced in undertaking landscape and visual appraisals. ADAS is a Landscape Institute registered practice and all work is subject to peer review.

2. Planning policy context

2.1. Local planning policy

Rother Local Plan: Core Strategy (2014)

2.1.1. The Rother District Local Plan Core Strategy provides broad guidance on the scale and distribution of development and replaces a number of policies in the Local Plan. The policies considered relevant to the site are set out below.

2.1.2. Policy OSS2: Use of Development Boundaries, states:

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

Existing development boundaries will be reviewed by the Development and Site Allocations DPD, having regard to the:

- i. Existing pattern, form and function of settlements, including of closely ‘linked’ settlements and important ‘gaps’ of countryside between them;***
- ii. Character and settings of individual towns and villages;***
- iii. Sensitivity to further development both within the main built up confines and in more rural fringes;***
- iv. The amount of land needed to fulfil development needs and requirements;***
- v. Availability of local infrastructure and services;***
- vi. Accessibility to facilities and services, and avoiding scattered and ribbon development;***
- vii. Environmental considerations, including the need to conserve designated areas of national and local landscape, archaeological, geological, ecological or historical importance; (viii) Following physical features, unless this may suggest a potential for development that is inappropriate.”***

2.1.3. Policy OSS3: Location of Development, states:

“In assessing the suitability of a particular location for development, when both allocating land for development and determining planning applications, sites and/or proposals should accord with the relevant policies of this Core Strategy and be considered in the context of:

- i. The spatial strategy for the particular settlement or area, and its distinct character;***
- ii. The capacity of, as well as access to, existing infrastructure and services, and of any planned or necessary improvements to them;***

- iii. *The local need for affordable housing;*
- iv. *Needs and priorities identified in approved Local Action Plans;*
- v. *The low carbon and renewable energy potentials of the site;*
- vi. *The character and qualities of the landscape;*
- vii. *Making effective use of land within the main built-up confines of towns and villages, especially previously developed land, consistent with maintaining their character;*
- viii. *Any constraints relating to land stability, contamination, air quality, agricultural land quality and coastal erosion, and the ability to satisfactorily address these;*
- ix. *The deliverability of development, including consideration of land ownership patterns and the viability of development;”*

2.1.4. Policy OSS4: General Development Considerations, states:

“In addition to considerations set out by other policies, all development should meet the following criteria:

- iii. *“It respects and does not detract from the character and appearance of the locality;*

2.1.5. Policy RA1: Rural Villages, states:

“The needs of the rural villages will be addressed by:

- i. *Protection of the locally distinctive character of villages, historic buildings and settings, with the design of any new development being expected to include appropriate high quality response to local context and landscape;*

2.1.6. Policy EN1: Landscape Stewardship, states:

“Management of the high quality historic, built and natural landscape character is to be achieved by ensuring the protection, and wherever possible enhancement, of the district’s nationally designated and locally distinctive landscapes and landscape features; including

- i. *The distinctive identified landscape character, ecological features and settlement pattern of the High Weald Area of Outstanding Natural Beauty;*
- ii. *The distinctive low-lying levels to the east of the district with particular regard to the landscape setting of Rye and Winchelsea;*
- iii. *Nationally designated historic sites including listed Parks and Gardens, Scheduled Ancient Monuments and the Registered Historic Battlefield at Battle;*

- iv. *The undeveloped coast;*
- v. *Open landscape between clearly defined settlements, including the visual character of settlements, settlement edges and their rural fringes;*
- vi. *Ancient woodlands; (vii) Tranquil and remote areas, including the dark night sky;*
- vii. *Other key landscape features across the district, including native hedgerows, copses, field patterns, ancient routeways, ditches and barrows, and ponds and water courses"*

2.1.7. Policy EN5: Biodiversity and Green Space, states:

"Biodiversity, geodiversity and green space will be protected and enhanced, by multi-agency working where appropriate, to:

- i. *Maintain and develop a district-wide network of green infrastructure where possible linking areas of natural green space;*
- ii. *Protect and enhance the international, national and locally designated sites, having due regard to their status;*
- iii. *Establish a major area of accessible open space at Combe Valley Countryside Park, between Bexhill and Hastings;*
- iv. *Enhance the nature conservation value and multi-functional nature of the Romney Marsh Biodiversity Opportunity Area;*
- v. *Support opportunities for management, restoration and creation of habitats in line with the opportunities identified for the Biodiversity Opportunity Areas (BOAs) and targets set out in the Sussex Biodiversity Action Plan;*
- vi. *Continue to develop the wetland habitat at Bewl Water Reservoir, with compatible recreational uses;*
- vii. *Increase accessibility to the countryside from urban areas, especially in the Hastings and Bexhill fringes;*
- viii. *Ensure that development retains, protects and enhances habitats of ecological interest, including ancient woodland, water features and hedgerows, and provides for appropriate management of these features;*
- ix. *Require developers to integrate biodiversity into development schemes by avoiding adverse impacts from development on biodiversity or habitat, or where wholly unavoidable, provide appropriate mitigation against or compensation for any losses. In any event, developers will also be expected to consider and promote opportunities for the creation and/or restoration of habitats appropriate to local context.*

Rother District Local Plan (2006)

- 2.1.8. A number of policies contained within the adopted Rother District Local Plan have been replaced by those set out above. There are no saved policies that haven't been replaced that are of relevance to residential development on the site.

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

- 2.1.9. The policies within the Draft Local Plan will replace the Core Strategy. The Below policies within the Draft Local Plan are considered relevant to the site. Proposed Policy GTC9: High Weald National Landscape (AONB), sets out:

All development within or affecting the setting of the High Weald National Landscape (AONB) shall conserve and enhance its distinctive landscape character, ecological features, settlement pattern and scenic beauty, having particular regard to the impacts on its character components, as set out in the latest version of the High Weald AONB Management Plan.

Development within the High Weald National Landscape should be small-scale, in keeping with the landscape and settlement pattern, and designed in a way that reflects its nationally-designated status as landscape of the highest quality, following the guidance in the High Weald AONB Housing Design Guide and Colour Study. Major development should not take place in the AONB save in exceptional circumstances as outlined at paragraph 183 of the NPPF.

- 2.1.10. Proposed Policy LWL2: Facilities & Services, sets out:

(A) All development proposals for one or more new dwellings must meet the following criteria:

....

ii) Public Squares and Spaces. Provide, or contribute to, a connected and accessible network of safe, attractive, varied public squares and open spaces with paths and other routes into and through, places to rest and interact e.g. benches and other types of seating and provide good signage and wayfinding that is accessible to all. This should form part of a wider connected accessible Green Infrastructure network which includes food growing opportunities (allotments and community gardens) and prioritises locally native plant species.

2.1.11. Proposed Policy LWL5: Distinctive Places, sets out

All development proposals for one or more new dwelling must meet the following criteria:

- i. Response To Site, Character and Landscape Context. Demonstrate a clear understanding of the context and landscape character (including townscape) of the site and beyond. New development must conserve, enhance, and draw inspiration from this context and character in either a traditional or contemporary style. The use of standard building or house types that take no account of local character, bad imitation of traditional design or simply replicate generic or mediocre design in the locality will not be acceptable.***
- ii. Design Concept. Be visually attractive and be informed by a clear rationale and strong design concept developed in response to an understanding of the context and landscape character (including townscape). The design concept must also inform a consistent choice of high-quality materials, finishes, detailing and landscape design. Generally, unprepossessing late twentieth century and twenty-first century development in the area should not be used as precedents for material and finishes choices in new development.***
- iii. High Weald National Landscape. All development within or affecting the setting of the High Weald National Landscape shall conserve and enhance its distinctive landscape character, ecological features, settlement pattern and scenic beauty, having particular regard to the impacts on its character components, as set out in relevant policies in this plan, the latest version of the High Weald National Landscape Management Plan and the High Weald AONB Design Guide and Colour Study.***

2.1.12. Proposed Policy HWB5: Green and Blue Infrastructure, sets out:

The protection, enhancement and provision of green and blue infrastructure⁴¹, including sufficient, well-managed and accessible, sports and recreation spaces, both formal and informal, will be achieved by:

- i. Safeguarding existing green and blue infrastructure (designated through this Local Plan's Policies Map) from development, and only permitting its loss where it results in improved provision (in terms of quantity and quality) as part of a redevelopment or elsewhere within the locality.***
- ii. Permitting proposals for the improvement of existing, or provision of new, green and blue infrastructure, in localities where deficits are identified.***

- iii. *Requiring development proposals to respond to and incorporate existing green and blue infrastructure, and integrate new, into design proposals, including providing links to existing green and blue infrastructure outside the development's boundaries.*

2.1.13. Proposed Policy LAN1: Rural Environments and Landscape Character, sets out:

The siting, layout and design of development should maintain and reinforce the natural and built landscape character of the area in which it will be located, based on a clear understanding of the distinctive local landscape characteristics. Priority must be given to the conservation and enhancement of the district's national designated and locally distinctive landscapes and landscape features, including but not limited to:

- i. *The High Weald National Landscape (which is also subject to Policy GTC9).*
- ii. *The Romney Marshes, comprising of the distinctive low-lying levels to the east of the district with particular regard to the landscape setting of Rye and Winchelsea.*
- iii. *The Pevensey Levels, comprising of the low-lying area of wetland meadows between Bexhill-on-Sea and Hailsham in Wealden District.*
- iv. *Nationally designated historic sites including listed Parks and Gardens, Scheduled Ancient Monuments and the Registered Historic Battlefield at Battle.*
- v. *The undeveloped coast.*
- vi. *Open landscape between clearly defined settlements, including the visual character of settlements, settlement edges and their rural fringes.*
- vii. *Ancient Woodlands.*
- viii. *Tranquil and remote areas, including the dark night sky.*

2.1.14. Proposed Policy LAN2: Trees, Woodlands and Hedgerows, sets out:

Development must, where appropriate, enhance and expand the district's tree, hedgerow and woodland resource.

Development that would result in the unacceptable loss of, or damage to, or threaten the continued well-being of, locally valued and/or protected hedgerows, community orchards, veteran trees or woodland will not be permitted.

Rother District Council Draft Housing and Economic Land Availability Assessment (2024)

2.1.15. The Rother District Draft Housing and Economic Land Availability Assessment (HELAA), Part 2: Site Assessments, assesses the site as two separate land parcels within the Northern Sub Area Ewhurst – East (including Staplecross, Cripps Corner). The southern part of the site is considered under Site ID EWH0009, while the northern part of the site is considered as Site ID EWH0018. The HELAA notes of ID EWH0009:

“This site forms the road-fronting section of a larger field on the eastern edge of Staplecross village, adjacent to a small modern housing estate (Hop Gardens). The field extends to the north and comprises a medieval fieldscape (assart) with historic field boundaries. The site has a strong rural character and is important in defining the rural setting of the village. It is on a higher level than the road to the south, and exposed to the countryside to the north, of which there are long views. Development here would be visible from a distance and would visually intrude into the countryside, impacting the landscape and character of the National Landscape.”

2.1.16. The HELAA notes of Site ID EWH0018:

“The site comprises an open field to the north of the village, forming part of a medieval fieldscape (assart) with historic field boundaries. It is an exposed site, visible from a distance across the countryside. Together with land to the south (EWH0009), the site forms an important gap in ribbon development along Northiam Road, contributing to the rural character of the village. The field is also remote from the village edge. Development here would represent a significant intrusion into the countryside, out of keeping with the settlement pattern and would impact on local character and views and on the landscape of the High Weald National Landscape.”

3. Existing landscape and visual context

Designations

- 3.1.1. The site is located on the eastern edge of the existing settlement of Staplecross, and is entirely situated within the High Weald Area of Outstanding Natural Beauty (AONB).

Topography

- 3.1.2. The site sits within an area of gently undulating land with much of the site being situated at approximately 90m AOD. In the wider landscape, some areas of slightly lower land are present to the north, with land rising gently towards the existing settlement of Staplecross, where a ridge line traverses the existing settlement of Staplecross along Northiam Road, which forms the southern boundary of the site.

Vegetation and land use

- 3.1.3. Staplecross is set within the context of a patchwork of small irregular arable fields that are separated by mature tree belts that connect large areas of broadleaved woodland, much of which is designated as Ancient Woodland. Settlements in the vicinity of the site follow the roads that traverse the agricultural landscape, with large scale agricultural buildings found within farmsteads.

3.2. Landscape character

- 3.2.1. The landscape character assessment approach is a descriptive approach that seeks to identify and define the distinct character of landscapes that make up the country. This approach recognises the intrinsic value of all landscapes, not just 'special' landscapes, as contributing factors in people's quality of life, in accordance with the European Landscape Convention. It also ensures that account is taken of the different roles and character of different areas, in accordance with the NPPF Core Principles. The description of each landscape is used as a basis for evaluation in order to make judgements to guide, for example, development or landscape management.

County character assessment

East Sussex Landscape Character Assessment (2016)

- 3.2.2. As identified within the East Sussex Landscape Character Assessment, the site is situated within the Landscape Character Area (LCA) Lower Rother Valley, the key characteristics of which are considered to be:

- ***“The area from Salehurst in the west to Rye in the east, the boundary with Kent in the north and the ridgeline B2089 to the south.*”**

- *The broad valley of the lower reaches of the River Rother.*
- *The Tillingham Valley with a flat open floor and steep well wooded sides.*
- *Long dramatic views across both valleys from the enclosing ridges and spurs.*
- *Engineered raised grass flood banks along the main river and straightened rivers channels which detract from the naturalness of the river valley.*
- *The ancient inland sea cliffs at Rye and Playden.*
- *An intricate pattern of rectangular fields bounded by reed fringed ditches in the flood plains.*
- *A few remaining extensive areas of orchards and some remnants of hop growing.*
- *Lines of Italian poplars planted as wind breaks are an introduced and characteristic feature, notably at Bodiam.*
- *Extensive loss of hedgerow on the lower valley slopes with trimmed and remnant hedgerows resulting in a stark intensively farmed landscape.*
- *Exceptionally remote unspoilt areas away from the main roads and villages.*
- *The larger settlements are on the ridge tops with typical ribbon development extending along the main roads.*
- *Typical High Weald scattered development of farmsteads, hamlets and large country house estates.*
- *Significant houses and designed landscapes at Brickwall, Great Dixter and Peasmarsh Place.*
- *Bodiam Castle dominates the Rother Valley landscape.*
- *Oast houses are characteristic and found on most farmsteads, many now converted into houses.*
- *Typical High Weald white weatherboarding and some villages have more subtle weatherboarding of pastel shades giving a sea side feel.*
- *Scattered woodland across the valley slopes and higher ground, much of this is ancient woodland. About half of the latter has been planted and some with extensive areas of conifers.*
- *The central area is heavily wooded with the Beckley, and Flatropers woodland areas, much of which is publically accessible.*
- *Indigenous characteristic tree species are oak and ash with sweet chestnut coppice on drier slopes.*
- *Beech, lime and pine feature locally and other exotic specimens are found in gardens and villages.*
- *Swans, herons and other wetland birds are very much features in the landscape.*
- *Three main roads cross the area the A21, A229, A28 and the A268, the B2089 forms the southern boundary.*

- *Winding and very narrow sunken country lanes with steep gradients where they drop down into the valleys.*
- *The Kent and East Sussex Steam Railway runs from Bodiam to Tenterden in Kent."*

3.2.3. The Landscape Character Assessment identifies a number of Landscape Management Guidelines for the Lower Rother Valley, with those specifically relevant to the site and its proposed allocation for residential development under the heading Protect and Enhance the character of the villages, set out below:

- *Encourage the production of Neighbourhood Plans which incorporate village design guides.*
- *Plan for new development in the villages to ensure it is designed to a high standard to reflect local character and sense of place.*
- *Establish defined development edges to villages with new tree planting.*
- *Prepare village design guides and tree conservation plans.*
- *Consider traffic management on rural lanes.*

Site landscape character

3.2.4. The site is formed by an area of land on the north-eastern edge of the settlement of Staplecross, which is enclosed on all sides by vegetation. The site is partially bounded to the west by existing residential development, the village Recreation Ground and a broad swathe of Ancient Natural Woodland at Bowling Alley Wood. The northern extent of the site is partially formed by a dense mature hedgerow, and partially formed by an area of Ancient Woodland at Watt's Wood. The eastern extent of the site is partially formed by an existing mature hedgerow beyond which is an arable field, and partially formed by an existing mature hedgerow beyond which is a residential property and curtilage. The southern boundary of the site is formed by a hedgerow that lines the B2165 Northiam Road with the site boundary separating existing residential properties, with residential properties on the south of the road facing the southern boundary of the site.

3.2.5. The site bears a strong relationship with the existing residential development and the settlement of Staplecross, owing to the existing residential properties at Hope Gardens on the southern edge of the site, the Staplecross Recreation Ground forming part of the western boundary of the site, and Brayburn Gardens on the southern part of the eastern site boundary. Furthermore, the site is strongly enclosed to the north by the Ancient Woodlands of Watt's Wood and Bowling Alley Wood.

4. Opportunities and Constraints

4.1. Landscape strategy

- 4.1.1. The site comprises a single agricultural field that is currently in active arable production, bound on all sides by mature hedgerow and woodland vegetation, providing the site with a strong physical and visual enclosure.
- 4.1.2. Development of the site should seek to retain as many of the important landscape features on site as possible and include an appropriate landscape scheme that has been informed by desk and site study, as shown in the Opportunities and Constraints Plan. A landscape strategy has been developed for the site with the following broad aims:
- Deliver residential development within the existing landscape pattern, utilising and enhancing existing vegetation to deliver strong boundaries to development that build upon the existing network of habitats and Green Infrastructure;
 - To assimilate the proposed development into the receiving landscape where existing residential development is situated on the ridgeline followed by Northiam Road;
 - Consolidate the existing settlement of Staplecross by focusing residential development around existing settlement facilities such as the Recreation Ground immediately adjacent to the site boundary;
 - Ensure the proposed development relates to the existing settlement lining both sides of Northiam Road;
 - Create a strong vegetated edge that acts as a landscape buffer between the new settlement edge and the wider landscape north and east of the site, enhancing and reinforcing the existing landscape framework through the utilisation of ancient woodland buffers to create strong and defined physical boundaries that are recognisable on the ground.
- 4.1.3. The Rother District Draft Housing and Economic Land Availability Assessment (HELAA), Part 2: Site Assessments, notes that the site sits amongst existing residential development along Northiam Road and ***“forms the road-fronting section of a larger field on the eastern edge of Staplecross village, adjacent to a small modern housing estate (Hop Gardens)”***
- 4.1.4. The Draft HELAA also notes that ***“the site forms an important gap in ribbon development along Northiam Road, contributing to the rural character of the village”***. However, at this point, semi-detached residential properties line the road frontage along the southern edge of Northiam road, providing the sense of continuous settlement at this point, with the settlement becoming more sparse east of this point, with more frequent gaps between detached properties that are set within generous plots and dispersed further by woodland vegetation.
- 4.1.5. The proposed development will deliver an opportunity to create a strongly defined settlement edge on both the northern and eastern boundaries of the site, through

the delivery of a robust landscape scheme that utilises and builds upon the Ancient Woodland buffer zones to deliver connected Green Infrastructure, in line with Policy EN5: Biodiversity and Green Space, of the Core Strategy, which aims to ***“Maintain and develop a district-wide network of green infrastructure where possible linking areas of natural green space”***. Furthermore, the delivery of a broad swathe of vegetation along northern boundary of the site, connecting the two ancient woodlands at Bowling Alley Wood and Watt’s Wood, in line with the aspirations of the Landscape Management Guidelines for Rother Valley, which aim to ***“establish defined development edges to villages with new tree planting”***.

- 4.1.6. A strong landscape strategy that builds upon the existing enclosure the site is afforded will limit the spatial extend of any visibility for development within the site within the wider landscape of the High Weald AONB. Development on the site will not extend the influence of existing built form at Staplecross, where existing built form primarily located along the ridgeline that is closely followed by Northiam Road, with residential development set amongst frequent native and ornamental trees.
- 4.1.7. The existing settlement of Staplecross is not currently clearly defined on the northern or eastern edge and development of the site offers the opportunity to implement a robust landscape strategy that will create strong and clearly defined edges to the settlement that are recognisable on the ground, utilising the existing enclosure provided by Bowling Alley Wood and Watt’s Wood, will extend and enhance the habitats and character of the AONB, in line with Policy EN1: Landscape Stewardship.
- 4.1.8. The proximity of the site to the Staplecross Recreation Ground provides additional opportunity for increasing access from the existing settlement of Staplecross to the wider countryside, by connecting the Recreation Ground, through the site, to PRoW EWH/24/1 that passes along a short section of the northern boundary of the site. The site also offers the opportunity to connect Northiam Road to PRoW EWH/24/1, through the site such that access to the wider AONB from existing parts of Staplecross is greatly improved. Additionally, the site will facilitate the consolidation of development around existing services provided by the Recreation Ground, in line with Policy OSS3: Location of Development, taking account of ***“the capacity of, as well as access to, existing infrastructure and services, and of any planned or necessary improvements to them”***.
- 4.1.9. Furthermore, development of the site offers the opportunity to deliver residential development in a configuration that respects Policy OSS2: Use of Development Boundaries, which highlights the need for development to be delivered with ***“accessibility to facilities and services, and avoiding scattered and ribbon development”***. The site relates strongly to existing built form within the settlement,

will enable the creation of strong and definite boundaries that are physically recognisable on the ground.

5. Summary

- 5.1.1. An initial landscape opportunities and constraints exercise has been undertaken for Land east of Hop Gardens, Northiam Road, Staplecross and Land South of Watts Wood, Staplecross to identify appropriate measures to support the accommodation of residential development.
- 5.1.2. Through landscape and visual interrogations, an opportunities and constraints study has been undertaken, focusing on the landscape and visual context of the site to make recommendations to facilitate the delivery of residential development on the site. It is considered within the capacity of the site to accommodate residential development without altering the character of the settlement.
- 5.1.3. Development of the site will be within the existing landscape pattern, utilising and enhancing existing vegetation to deliver strong boundaries to development. The existing residential development in the settlement is situated along the ridgeline that follows Northiam Road, providing a context for residential development on the site, which will not extend the influence of the settlement.
- 5.1.4. Development on the site will consolidate the existing settlement of Staplecross by focusing residential development around existing settlement facilities such as the Recreation Ground immediately adjacent to the site boundary, furthermore, development on the site will facilitate the creation of a strong vegetated edge that acts as a landscape buffer between the new settlement edge and the wider landscape north and east of the site, enhancing and reinforcing the existing landscape framework through the utilisation of ancient woodland buffers to create strong and defined physical boundaries that are recognisable on the ground.
- 5.1.5. The site is situated on the edge of the existing settlement of Staplecross and relates strongly to the adjacent residential properties within the settlement of Staplecross, owing to the existing residential properties at Hope Gardens on the southern edge of the site, the Staplecross Recreation Ground forming part of the western boundary of the site, and Brayburn Gardens on the southern part of the eastern site boundary.
- 5.1.6. The Draft HELAA also notes that *“the site forms an important gap in ribbon development along Northiam Road, contributing to the rural character of the village”*. However, at this point, semi-detached residential properties line the road frontage along Northiam Road south of the site, providing the sense of continuous settlement at this point, with the settlement becoming more sparse east of this point where more frequent gaps between detached properties accommodate properties that are set within generous plots and dispersed further by woodland vegetation.

- 5.1.7. The existing settlement of Staplecross is not currently clearly defined on the northern or eastern edge. Development on the site will present the opportunity to create a strongly defined settlement edge on both the northern and eastern boundaries of the site, through the delivery connected Green Infrastructure, in line with Policy EN5: Biodiversity and Green Space, of the Core Strategy, which aims to ***“Maintain and develop a district-wide network of green infrastructure where possible linking areas of natural green space”***. Additionally, this will deliver upon the aspirations set out within the Landscape Management Guidelines for Rother Valley, which aim to ***“establish defined development edges to villages with new tree planting”***.
- 5.1.8. The proximity of the site to the Staplecross Recreation Ground provides additional opportunity for increasing access from the existing settlement of Staplecross to the wider countryside, by connecting the Recreation Ground, through the site, to PRoW EWH/24/1
- 5.1.9. Furthermore, development of the site offers the opportunity to deliver residential development in a configuration that respects Policy OSS2: Use of Development Boundaries, which highlights the need for development to be delivered with ***“accessibility to facilities and services, and avoiding scattered and ribbon development”***. The site relates strongly to existing built form within the settlement, will enable the creation of strong and definite boundaries that are physically recognisable on the ground.



LEGEND

-  Site Boundary
-  Views into undeveloped open countryside
-  Ancient Woodland
-  Proposed planting to create vegetative buffers
-  Listed buildings
-  Open areas of undeveloped countryside
-  Gap in ribbon development with character of residential properties moving from semi-detached west of the gap and detached properties in large vegetated plots east of the gap.
-  Ridge line
-  Opportunity for increasing access to the wider AONB through the site

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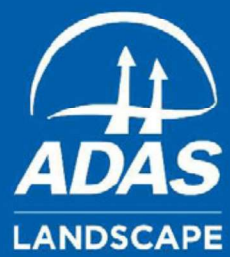
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Appendix 3.

Other Villages with Development Boundaries

Policies Map Inset Map 19: Staplecross

