

HWNL Unit Comments on proposed new site allocations in RDC Local Plan 2026 consultation

Reg 18 Local Plan reference	Site name	Development quantum	HWNL Unit comments
Battle			
General comment: As the only town in Rother within the HWNL, it is understandable that greater housing provision would be sought here, and in principle the town has more capacity to absorb development without adversely impacting on the HWNL than the smaller rural villages. However, the settlement pattern and morphology of the town in the HWNL, and the landscape setting of the town, are still highly important considerations. We also consider that BT1, BT8 and BT10 should also be considered cumulatively due to their locational relationship.			
BT1	Land south of Hastings Road, Battle	220 dwellings	<p>MAJOR</p> <p>This scale of development in this location should be considered major development under NPPF 190, and therefore there would be a presumption against it.</p> <p>The western parcel is registered by NE as BAP Priority Habitat (Woodpasture & Parkland) and includes an identified Wildflower Meadow, and should not be included in an allocation for built development.</p> <p>We cannot comment further on the suitability of this site, and impacts on the HWNL, without the benefit of Landscape Sensity Studies; the eastern parcel may have more potential to accommodate some built development, but the appropriate capacity and extent of land coverage of development needs to be considered through further Landscape Sensitivity Assessment work in terms of visibility in the landscape, topography, and the retention of the hedgerows and tree groups within and surrounding the site, and the existing pond. This work should be carried out prior to the next iteration of the draft plan, to inform any potential allocation here. We cannot comment further on the suitability of this eastern part of the site, and impacts on the HWNL, without the benefit of Landscape Sensity Studies.</p>
BT2	Land at Breadsell, Battle	145 dwellings	<p>(setting of HWNL)</p> <p>We cannot comment further on the suitability of this site, and impacts on the HWNL, without the benefit of Landscape Sensity Studies.</p>
BT6	Land at Sunny Rise, Battle	10 dwellings	<p>We cannot comment further on the suitability of this site, and impacts on the HWNL, without the benefit of Landscape Sensity Studies.</p> <p>Though the site is referred to in the draft plan as being previously allocated in the Rother Local Plan (2006) - Policy BT3, in fact site BT3 was largely delivered by the development of Sunny Rise.</p> <p>The site is bound to the north and east by designated Ancient Woodland (ASNW). Woodland is identified in the HWAONB Management Plan as one of the key components of natural beauty.</p> <p>We are unconvinced about the site's capacity to absorb the proposed quantum of built development once the need to protect the ASNW and provide buffer zones is taken into account. Capacity should be considered through further Landscape Sensitivity assessment work to assess the site prior to the next iteration of the plan, to inform any potential allocation here.</p>

Reg 18 Local Plan reference	Site name	Development quantum	HWNL Unit comments
BT7	Land at Almonry Farm, Battle	80 dwellings	<p>MAJOR</p> <p>This scale of development in this location should be considered major development under NPPF 190, and therefore there would be a presumption against it.</p> <p>The site displays a number of the identified character components of the HWNL's natural beauty set out in the Management Plan; it is identified as part of a medieval field system (assart fields AD 1066 – AD 1499), each field within bound by historic field boundaries (hedgerows) and is bound to the east by designated Ancient Woodland (ASNW). Development on this site would adversely impact on these character components.</p> <p>We cannot comment further on the suitability of this site, and impacts on the HWNL, without the benefit of Landscape Sensitivity Studies; any potential for development, would need to be considered through further work in terms of impact on landscape character, visibility in the landscape, topography, and the retention of the hedgerows and tree groups within and surrounding the site, with regard to extent of site coverage and quantum of accommodation, prior to any allocation.</p>
BT8	Land adjacent to 1 Loose Farm Cottages, Battle	5 dwellings	<p>OBJECT: Though a small allocation, development of this site would undermine the existing settlement pattern; it would infill the present gap between the Hasting Rd buildings, and the historic farmstead of Loose Farm (converted) – a gap which is important to the legibility and landscape setting of the historic farmstead. This allocation would therefore be contrary to HW AONB Management Plan Objective S1, 'To protect the historic pattern and character of settlements', underpinned by the following rationale: <i>'To protect the distinctive character and landscape settings of towns, villages, hamlets and farmsteads, remove despoiling influences, and maintain the hinterlands and other relationships (including separation and green infrastructure) between settlements that contribute to local identity.'</i></p> <p>As such, we consider the allocation of the site for development would not conserve and enhance the HWNL, would be contrary to para 189 of the NPPF, and we consider the site should not be allocated for development in the Rother District Local Plan.</p>
BT9	Land east of Coronation Gardens, Battle	75 dwellings	<p>MAJOR</p> <p>This scale of development in this location should be considered major development under NPPF 190, and therefore there would be a presumption against it.</p> <p>The site is identified as part of a medieval field system (assart fields AD 1066 – AD 1499), a key character component of the HWNL's natural beauty set out in the Management Plan.</p> <p>We cannot comment further on the suitability of this site, and impacts on the HWNL, without the benefit of Landscape Sensitivity Studies, which would need to include considering the impact of site access on the HWNL.</p>

Reg 18 Local Plan reference	Site name	Development quantum	HWNL Unit comments
BT10	Land adjoining Little Brans, Battle	65 dwellings	<p>MAJOR</p> <p>OBJECT: This scale of development in this location should be considered major development under NPPF 190, and therefore there would be a presumption against it.</p> <p>The site is described in the HELAA Assessment as sensitive due to its ridge-top location.</p> <p>Development of this site would be highly inconsistent with the morphology of the town of Battle and its pattern of growth.</p> <p>The site displays a number of the identified character components of the HWNL’s natural beauty set out in the Management Plan; it is identified as part of a medieval field system (assart fields AD 1066 – AD 1499), and is bound to the south by designated Ancient Woodland (ASNW). Development on this site would adversely impact on these character components.</p> <p>We consider the allocation of the site for development would not conserve and enhance the HWNL, would be contrary to para 189 and 190 of the NPPF, and we consider the site should not be allocated for development in the Rother District Local Plan.</p>
BT11	Battle Market Square, Battle	(a) 52 dwellings (b) retention of existing retail floorspace	<p>No objection to the principle of allocation. In view of its contained town centre location, we would not consider this to be major development in the HWNL. However, we note the policy text highlights that a “<i>masterplan should be informed by a character assessment to determine an appropriate layout, form and detailed design to ensure the conservation and enhancement of the character of the High Weald National Landscape and the protection of the setting of heritage assets including Battle Conservation Area</i>”. However, there is no information as to what height / form/ massing of apartment building the proposed quantum of 52 dwelling is based on. The appropriate number for allocation should stem from consideration of appropriate built form with regard to the Battle Conservation Area, not trying to retrofit a scheme to deliver the pre-determined no of dwellings. Therefore we consider further work is required prior to confirming the quantum in the allocation.</p>
Beckley			
BC1	Land South and West of Buddens Green, Beckley Four Oaks	20 dwellings	<p>OBJECT: Eastern part of site allocated for 6 dwellings in the DaSA Local Plan (Policy BEC2 Land South of Buddens Green).</p> <p>The site displays a number of the identified character components of the HWNL’s natural beauty set out in the Management Plan; it is identified as part of a medieval field system (assart fields AD 1066 – AD 1499), and is bound on its western edge by a historic field boundary.</p> <p>Development of this site with 16 dwellings has also been the subject of a dismissed appeal, APP/U1430/W/18/3197448, in which the Inspector found that development here ‘<i>would erode the rural character and appearance of the locality by infilling a presently attractive and locally important open gap of countryside along the road frontage, which helps to maintain the dispersed settlement pattern of this part of Beckley</i>’; that ‘<i>The appeal site has intrinsic value as countryside within the High Weald AONB as an attractive landscape with views across the field to the trees at the southern boundary, and as an important gap between two distinctive parts of the settlement.</i>’ And that ‘<i>the erection of new dwellings and associated</i></p>

Reg 18 Local Plan reference	Site name	Development quantum	HWNL Unit comments
			<p><i>infrastructure and paraphernalia would fundamentally alter the landscape and scenic beauty of this part of the AONB. This is harm that provides a clear reason for the dismissal of the appeal proposal.'</i></p> <p>We concur with the Inspectors' conclusions regarding the harms to the HWNL of development of this site, and consider that the allocation of the site for development would fail to conserve or enhance the natural beauty of the HWNL. Whilst it is acknowledged that, were the site to be allocated, an alternative scheme to the appeal one could be submitted, nevertheless the comprehensive conclusions of the Inspector regarding the adverse impacts of development of the site on the HWNL, focussed as they were on the principle of development mean that we consider the site should not be allocated for development in the Rother Local Plan.</p>
BC3	Land west of Oaklea Cottages, Beckley Four Oaks	13 dwellings	<p>We cannot comment further on the suitability of this site, and impacts on the HWNL, without the benefit of Landscape Sensity Studies, which would need to include considering the 'roadside development only' option described in the HELAA, prior to allocation.</p> <p>The site displays a number of the identified character components of the HWNL's natural beauty set out in the Management Plan; it is identified as part of a medieval field system (assart fields AD 1066 – AD 1499), and is bound by historic field boundaries.</p> <p>The HELAA highlights that development here would be out of keeping with the settlement pattern, and, though more enclosed than other fields, would encroach on views out into the countryside across the site which are important to the rural character of the village.</p> <p>Similar to site BC1, development of this site would in-fill a presently attractive and locally important open gap of countryside along the road frontage, which helps to maintain the dispersed settlement pattern of this part of Beckley.</p>
Broad Oak			
BR2	Land west of Tillingham View, Broad Oak	70 dwellings	<p>MAJOR</p> <p>This scale of development in this location should be considered major development under NPPF 190, and therefore there would be a presumption against it.</p> <p>The impacts of this site need to be considered cumulatively with adjacent site BR1 which is an existing DaSA allocation for 29 dwellings.</p> <p>The site displays a number of the key characteristics of natural beauty as defined in the HW AONB Management Plan, it is identified as part of a medieval field system (assart fields AD 1066 – AD 1499), and is bound to the north by designated Ancient Woodland (Little Austens Wood), bound by a historic PRoW. Development on this site would adversely impact on these character components.</p> <p>We cannot comment further on the suitability of this site, and impacts on the HWNL, without the benefit of Landscape Sensity Studies.</p>

Reg 18 Local Plan reference	Site name	Development quantum	HWNL Unit comments
BR3	Land at Broad Oak Lodge, Chitcombe Road, Broad Oak	20 dwellings	<p>OBJECT: We are aware that part of the site is subject to an extant permission for 2 additional dwellings (RR/2024/625/P). This was arrived at following two dismissed appeals for greater development on the site (APP/U1430/W/22/3305548 and APP/U1430/W/22/3307541) both dismissed June 2023.</p> <p>We consider the approved scheme is the maximum development the site could take without adversely impacting on the HWNL; the Inspector previously advised <i>‘The appeal site and low-key development within it currently provide an appropriate transition between the countryside and settlement, which make a positive contribution to the character and appearance of the locality, including the AONB’</i>. We consider that to extend development in an allocation even further west, west of the pond, would result in the encroachment with built form into open undeveloped fieldscape which presently contributes positively to the HWNL landscape character of the setting of the village of Broad Oak. (This also echoes the findings of the HELAA LSA which says for this site <i>‘Development here would extend the settlement westwards to the detriment of the rural character of the area and rural setting of the village.’</i>)</p> <p>As such, we consider the allocation of the site for development would not conserve and enhance the HWNL, would be contrary to para 189 of the NPPF, and we consider the site should not be allocated for development in the Rother District Local Plan.</p>
Burwash			
BW1	Land north of Shrub Lane, Burwash	35 dwellings	<p>We cannot comment further on the suitability of this site, and impacts on the HWNL, without the benefit of Landscape Sensity Studies.</p> <p>However, it is unclear why the proposed red line boundary includes an area of designated ancient woodland ASNW. There appears to be no reason or justification to include this area of Ancient Woodland within the allocation, since it sits at the very periphery of the proposed site, close to the boundary with the HWNL. It would not be suitable to provide any infrastructure role (green recreational space etc) for the development, since these would lead to indirect impacts to the Ancient Woodland contrary to Natural England’s standing advice. We therefore do not consider it appropriate to include areas of Ancient Woodland unnecessarily within development site allocations. The red line boundary should be amended accordingly.</p>
BW2	Land at 101 Shrub Lane, Burwash	6 dwellings	<p>Whilst we have no objection to the principle of re-development here, we are unconvinced that 6 dwellings can be accommodated on the site in an adequate design and layout that does not harm the character of the HWNL or the listed building opposite. We therefore consider further work is needed to determine the quantum of development that can be satisfactorily accommodated on the site.</p>
BW3	Land east of Shrub Lane (north), Burwash	15 dwellings	<p>OBJECT: Development of this site (and BW4) would be highly intrusive into the HWNL landscape on the presently undeveloped side of the road; we do not consider the presence of Greenfield Road sets a precedent for new ribbon development along the south-eastern side of Shrub Lane. It would result in the encroachment with extensive built form into the open undeveloped fieldscape which presently contributes positively to the landscape character and natural</p>

Reg 18 Local Plan reference	Site name	Development quantum	HWNL Unit comments
			<p>beauty of the HWNL and would inevitably result in an urbanising incursion into the rural landscape of the HWNL (indeed the HELAA LSA sets out that to place buildings in the setting of the historic agricultural cottages of Greenfield Road '<i>would detract from the unique sense of place that they provide.</i>')</p> <p>As such, we consider the allocation of the site for development would not conserve and enhance the HWNL, would be contrary to para 189 of the NPPF, and we consider the site should not be allocated for development in the Rother District Local Plan.</p>
BW4	Land east of Shrub Lane (south), Burwash	8 dwellings	<p>OBJECT: Though a small allocation. development of this site (and BW2) would be highly intrusive into the HWNL landscape on the presently undeveloped side of the road; we do not consider the presence of existing ribbon development to the south sets a presence for new ribbon development along the south-eastern side of Shrub Lane. It would result in the encroachment with extensive built form into the open undeveloped fieldscape which presently contributes positively to the landscape character and natural beauty of the HWNL and would inevitably result in an urbanising incursion into the rural landscape of the HWNL.</p> <p>As such, we consider the allocation of the site for development would not conserve and enhance the HWNL, would be contrary to para 189 of the NPPF, and we consider the site should not be allocated for development in the Rother District Local Plan.</p>
Burwash Common			
BWC1	Land south of Heathfield Road, Burwash Common	7 dwellings	<p>OBJECT: The site is outside of the clearly defined settlement boundary, and though a small allocation, development here would result in an incursion into undeveloped field that contributes positively to character and natural beauty of HWNL and the setting of the village.</p> <p>It is difficult to see how new access could be created without requiring significant hedgerow removal including boundary trees. Indeed we note the HELAA LSA set out that '<i>The site is sensitive as a green open space which is outside the main settlement of Burwash Common the sloping nature and historic boundary hedge would make it difficult to mitigate for development.</i>'</p> <p>As such, we consider the allocation of the site for development would not conserve and enhance the HWNL, would be contrary to para 189 of the NPPF, and we consider the site should not be allocated for development in the Rother District Local Plan.</p>
BWC2	Old Orchard Nursery, Heathfield Road, Burwash Common	9 dwellings	<p><i>No objection in principle subject to the other general site-specific comments on our reps letter being addressed.</i></p>

Reg 18 Local Plan reference	Site name	Development quantum	HWNL Unit comments
Catsfield			
CT2	Land south of Wilton House Equestrian Centre, Catsfield	20 dwellings	<i>No objection in principle subject to the other general site-specific comments on our reps letter being addressed.</i>
CT3	Land south of Church Road, Catsfield	35 dwellings	<p>Setting of HWNL.</p> <p>We are aware that this site was the subject of a refused outline planning application for 28 dwellings (RR/2020/1562/P), refused on (amongst other things) the grounds of insufficient info to demonstrate landscape impacts on the adjacent HWNL.</p> <p>We cannot comment further on the suitability of this site, and impacts on the HWNL, without the benefit of Landscape Sensity Studies, which would need to include consideration of the issues raised in the report for RR/2020/1562/P regarding the setting of the HWNL, prior to allocation. In this regard, we are unconvinced about the potential of the site to deliver the quantum of dwellings proposed in the allocation.</p>
Crowhurst			
CR1	Land at Station Road and Forewood Lane, Crowhurst	25 dwellings	<p>We note that this allocation proposes increased the 12 dwellings allocated in CH2 of Crowhurst NP to 25 dwellings. The allocation proposes to extend the site to include an area of existing agricultural buildings is in topographically prominent area, hence not previously being included in site allocation. Heights would be critical in this area – the existing southernmost existing building is only single storey – anything higher would be significantly intrusive in the landscape here.</p> <p>An indicative layout map in the Local Plan will be needed to explain areas of open space and retained and enhanced landscaping, along with building heights parameters. (e.g. as per NP which describes extensive work needed)</p>
CR2		18	<p>We note that this allocation proposes increased the 12 dwellings allocated in CH2 of Crowhurst NP to 18 dwellings. Whilst this may be possible depending on unit size, an indicative layout map in the Local Plan will be needed to explain areas of open space and retained and enhanced landscaping. (e.g. as per NP which describes extensive work needed)</p>
Etchingham			
EC1	Land at Oxenbridge Lane, Etchingham	10 dwellings	<i>No objection in principle subject to the other general site-specific comments on our reps letter being addressed.</i>

Reg 18 Local Plan reference	Site name	Development quantum	HWNL Unit comments
EC2	Land at Church Lane, Etchingham	5 dwellings	<p>OBJECT: Though a small allocation, it would result in a significant incursion into undeveloped fieldscape that contributes positively to character and natural beauty of HWNL. The presence of the small row of historic railway workers cottages on the opposite side of the road is not considered to set a precedent for building on the undeveloped western side. Indeed the HELAA LSA sets out that <i>‘The site is very much contiguous with the wider AONB landscape to the west and proposed development would be out of character with the landscape setting of the village.’</i></p> <p>As such, we consider the allocation of the site for development would not conserve and enhance the HWNL, would be contrary to para 189 of the NPPF, and we consider the site should not be allocated for development in the Rother District Local Plan.</p>
EC3	Croft Field, Etchingham	55 dwellings	<p>MAJOR</p> <p>This scale of development in this location should be considered major development under NPPF 190, and therefore there would be a presumption against it.</p> <p>OBJECT: The present undeveloped field is highly prominent in landscape due to elevated topography. Our data shows that this is a medieval field. Whilst the built form of Etchingham has moved westwards with the recent development of Parsonage Court, nevertheless that development now forms a clear settlement edge. The proposed allocation would result in a significant extension of the settlement westwards (notwithstanding that the allocation is for built form on the eastern part of the site) and would result in a significant urbanising incursion into undeveloped rural fieldscape that contributes positively to character and natural beauty of HWNL, and adversely impacting on settlement form and setting. It is not considered the sporadic linear development on the southern side of the road sets any precedent for allocating a site on the north, in part due to the topography meaning that the existing buildings to the south are set at a far lower level. Also, the site is registered on the Natural England Priority Habitat Inventory as ‘good quality semi-improved grassland’. We do not consider it appropriate to allocate good quality semi-improved grassland in the HWNL for development, even in part.</p> <p>As such, we consider the allocation of the site for development would be contrary to a number of objectives in the HW AONB Management Plan, would not conserve and enhance the HWNL, would be contrary to paras 189 and 190 of the NPPF, and we consider the site should not be allocated for development in the Rother District Local Plan.</p>
Flimwell			
FW1	Land rear of Fruitfields, High Street, Flimwell	32 dwellings	<i>No objection in principle subject to the other general site-specific comments on our reps letter being addressed.</i>
FW2	Hawkhurst Road, Flimwell	(a) 114 dwellings (b) 1,650 sqm employment floorspace (c)	<p>MAJOR</p> <p>This scale of development in this location should be considered major development under NPPF 190, and therefore there would be a presumption against it.</p> <p>OBJECT: Allocation of this extensive site, for such a large quantum of dwellings, would conflict with settlement pattern of the area, which is primarily linear in form east-west along the A268 and B2087. The large-scale settlement extension</p>

Reg 18 Local Plan reference	Site name	Development quantum	HWNL Unit comments
		new community use facility or building (d) convenience retail unit	<p>would be highly uncharacteristic of the patten of growth of the village, and through its scale and extent is considered to have a dominating effect on the ‘parent’ settlement of the village.</p> <p>We are also concerned with the supporting text in the draft policy ; The fact that a site is ‘enclosed from the wider High Weald Landscape ’ is not unusual for the HW landscape – in fact its highly typical of the small-scale landscape character, with an intricate and scenic mosaic of small, irregularly shaped fields often bounded by hedgerows, shaws and small woodlands, as defined in the AONB Management Plan. That a site might not be widely visible across the wider HWNL should not be considered a justification for major development, and does not diminish the potential adverse impacts of the development on the natural beauty of the HWNL.</p> <p>The allocation as a whole is therefore considered to be contrary to a number of objectives of the High Weald AONB Management Plan. As such, we consider the allocation of the site for development would not conserve and enhance the HWNL, would be contrary to paras 189 and 190 of the NPPF, and we consider the site should not be allocated for development in the Rother District Local Plan.</p> <p><u>Site FW2a (44 dwellings) (western site)</u></p> <p>This site displays a number of the identified character components of the HWNL’s natural beauty set out in the Management Plan; it is identified as part of a medieval field system (assart fields AD 1066 – AD 1499), bound with historic field boundaries, and is bordered on its north-eastern edge by designated Ancient Woodland.</p> <p><u>Site FW2b (70 dwellings) (eastern site)</u></p> <p>This site displays a number of the identified character components of the HWNL’s natural beauty set out in the Management Plan; it is identified as part of a medieval field system (assart fields AD 1066 – AD 1499), and is bound on its northern edge by designated Ancient Woodland.</p> <p>We note that the southern part of site FW2b was the subject of a dismissed appeal for 8 dwellings (APP/U1430/W/20/3265770) appeal dismissed September 2021. IN dismissing that appeal, the Inspector found: <i>‘Notwithstanding the retention of the majority of the hedgerows and trees bounding the site, ...The development would suburbanise the site and consolidate the sporadic development along this part of the A268 into more of a ‘ribbon’ form of development, losing the visual break and longer views towards woodland beyond that the site currently provides.’</i> And that <i>‘I do not consider that additional screen planting would mitigate that harm in the long term, and the adverse effect on the landscape would persist into the future.’</i> He concluded: <i>‘I conclude that the proposed development would cause harm to the landscape and scenic beauty of the High Weald Area of Outstanding Natural Beauty.’</i></p> <p>We concur with the Inspectors’ conclusions regarding the harms to the HWNL of development of this site, and consider that the allocation of the site for development would fail to conserve or enhance the natural beauty of the HWNL. Whilst it is acknowledged that, were the site to be allocated, an alternative scheme to the appeal one could be submitted, nevertheless the comprehensive conclusions of the Inspector regarding the adverse impacts of development of the site on the HWNL, focussed as they were on the principle of development mean that we consider the site should not be allocated for development in the Rother Local Plan.</p>

Reg 18 Local Plan reference	Site name	Development quantum	HWNL Unit comments
			<p>We would further note that the reference to a new community building seems somewhat curious as a new Flimwell Village Hall has only recently been built as part of a development on the immediate opposite side of the A21, and the majority of the settlement of Flimwell lies to the west of the A21.</p> <p>Lastly it is noted that the policy requires the retention of the existing business/ retail use within the western part of the site. However, the remainder of the site is currently occupied by a plant nursery. Management Plan objective LBE1 seeks to support horticulture and other land management activities in the HWNL, and a site presently in this use, for housing development would be contrary to this.</p>
FW3	Cedar Farm, London Road, Ticehurst	1,650 sqm employment floorspace	No objection in principle subject to the other general site-specific comments on our reps letter being addressed.
Guestling Green			
GU2	Brackendale, Rock Lane, Hastings Fringes	20 dwellings	We cannot comment further on the suitability of this site, and impacts on the HWNL, without the benefit of Landscape Sensity Studies , which would need to include considering topography here and views from Winchelsea Lane, prior to allocation.
GU4	Wild Meadows, Chapel Lane, Guestling Green	20 dwellings	We cannot comment further on the suitability of this site, and impacts on the HWNL, without the benefit of Landscape Sensity Studies , which would need to include considering topography here and views from the north, prior to allocation.
GU5	Former Highways Depot, Guestling Green	8 dwellings	<i>No objection in principle subject to the other general site-specific comments on our reps letter being addressed.</i>
GU6	Field at Halfhouse, Butchers Lane, Three Oaks	12 dwellings	OBJECT: Though a relatively small allocation, development of this site would be highly intrusive into the HWNL landscape on the presently undeveloped side of the road, and would result in the encroachment with built form into open undeveloped fieldscape which presently contributes positively to the landscape character of the HWNL. As such, we consider the allocation of the site for development would not conserve and enhance the HWNL, would be contrary to para 189 of the NPPF, and we consider the site should not be allocated for development in the Rother District Local Plan.
Hurst Green			
HG3	Land to Rear of The Olde Bakery, London Rd, Hurst Green	35 dwellings	No objection in principle subject to the other general site-specific comments on our reps letter being addressed. We do consider that 35 dwellings is an ambitious target for this site, particularly with the retention of the stream/ditch historic field boundary that sub-divides the two lower fields, and its incorporated within the layout. The policy wording should make clear that a tight-knit terraced development, based on the recent Foundry Close development to the north, will be expected, to achieve this.

Reg 18 Local Plan reference	Site name	Development quantum	HWNL Unit comments
HG4	Land at The Lodge, London Road, Hurst Green	(a) 150 dwellings (b) A mix of uses that may include community, employment, leisure or retail	<p>MAJOR</p> <p>This scale of development in this location should be considered major development under NPPF 190, and therefore there would be a presumption against it.</p> <p>OBJECT: Allocation of this extensive site, for such a large quantum of dwellings, would grossly conflict with settlement pattern of the area, and would significantly urbanise the rural setting of the village. The large-scale settlement extension would be highly uncharacteristic of the patten of growth of the village, and through its scale and extent would have a dominating effect on the ‘parent’ settlement of the village.</p> <p>We are also concerned with the supporting text in the draft policy; The fact that a site is ‘enclosed from the wider High Weald Landscape ’ is not unusual for the HW landscape – in fact its highly typical of the small-scale landscape character, with an intricate and scenic mosaic of small, irregularly shaped fields often bounded by hedgerows, shaws and small woodlands, as defined in the AONB Management Plan. That a site might not be widely visible across the wider HWNL should not be considered a justification for major development, and does not diminish the potential adverse impacts of the development on the natural beauty of the HWNL. Also, para 190 isn’t about ‘securing public benefit’, but rather whether exceptional circumstances exist and whether the development would be in the public interest. Of course ‘public interest’ in this context should reflect that protected landscapes are statutorily designated landscapes and protected for the nation’s benefit, in the national interest.</p> <p>Development of the site would result in the significant encroachment with extensive built form into the open undeveloped fieldscape which presently contributes positively to the landscape character of the HWNL and the rural setting of the village. It would inevitably result in an urbanising incursion into the rural landscape of the HWNL. The allocation is therefore considered to be contrary to a number of objectives of the High Weald AONB Management Plan.</p> <p>As such, we consider the allocation of the site for development would not conserve and enhance the HWNL, would be contrary to paras 189 and 190 of the NPPF, and we consider the site should not be allocated for development in the Rother District Local Plan.</p>
Icklesham			
IK1	Land adjacent to Little Sherwood Industry Park, Icklesham	26 dwellings	<p>MAJOR</p> <p>OBJECT: Development of this site would be highly intrusive into HWNL landscape on undeveloped southern side of the road, where the landscape sweeps down to the south with open, expansive views. The site is bordered on its eastern and western edges by historic PRoWs. The existing agricultural buildings at eastern edge of proposed site are particularly visible in long views north from Watermill Lane due to the significant topography here. Development here would inevitably result in an urbanising incursion into the rural landscape of the HWNL.</p> <p>We note the HELAA LSA highlights that ‘<i>Extending development to this southern side of the A259 would not be in keeping with the settlement pattern which largely confines development to the north.</i>’</p> <p>We consider the impacts on the HWNL here to be so significant that the allocation should be considered major development under footnote 64 of para 190 of the NPPF.</p>

Reg 18 Local Plan reference	Site name	Development quantum	HWNL Unit comments
			As such, we consider the allocation of the site for development would not conserve and enhance the HWNL, would be contrary to para 189 and 190 of the NPPF, and we consider the site should not be allocated for development in the Rother District Local Plan.
IK2	Land adjacent to Orchard Close, Icklesham	32 dwellings	<p>OBJECT: Development of this site would be highly intrusive into HWNL landscape; it extends deeper (further north) than recent exception site to east and would be an uncharacteristic form of development in relation to the existing settlement pattern. Development here would inevitably result in an urbanising incursion into the rural landscape of the HWNL. Exception sites should not in themselves set a precedent for further adjacent development on the basis of the existing 'exception' development.</p> <p>As such, we consider the allocation of the site for development would not conserve and enhance the HWNL, would be contrary to para 189 of the NPPF, and we consider the site should not be allocated for development in the Rother District Local Plan.</p>
Iden			
ID2	Land at Street Field, Main Street, Iden	10 dwellings	No objection in principle subject to the other general site-specific comments on our reps letter being addressed.
Northiam			
NR2	Egmont Farm, Northiam	25 dwellings	<p>OBJECT: Development here would result in an incursion into undeveloped rural field that contributes positively to character and natural beauty of HWNL. It would inevitably result in an urbanising and prominent incursion into the rural landscape of the HWNL in a relatively remote location from the settlement, particularly at the eastern end, which would be highly visible in longer views to/from the north and east, as highlighted in the HELAA LSA.</p> <p>The site is identified as part of a medieval field system (Early Post-Medieval fields AD 1500– AD 1599), a key character component of the HWNL's natural beauty set out in the Management Plan.</p> <p>We consider the allocation of the site for development would not conserve and enhance the HWNL, would be contrary to para 189 of the NPPF, and we consider the site should not be allocated for development in the Rother District Local Plan.</p>
Peasmarsch			
PE1	Land south of Main Street, Peasmarsch	70 dwellings	<p>MAJOR</p> <p>This scale of development in this location should be considered major development under NPPF 190, and therefore there would be a presumption against it.</p> <p>OBJECT: The site displays a number of the key characteristics of natural beauty as defined in the HW AONB Management Plan, the small fieldscapes bound by historic field boundaries, and a historic PROW running north/south through site, bisecting largest of fields proposed for development.</p> <p>Development of the site would result in the encroachment with extensive built form into the open undeveloped fieldscape which presently contributes positively to the landscape character of the HWNL. It would inevitably result in an urbanising</p>

Reg 18 Local Plan reference	Site name	Development quantum	HWNL Unit comments
			incursion into the rural landscape of the HWNL. The allocation is therefore considered to be contrary to objectives S1, FH2 and PQ2 of the High Weald AONB Management Plan. The proposed allocation would also need to be considered in terms of cumulative impact with PE2 (Existing DaSA allocation Policy PEA1: Land south of Main Street, Peasmarsh). As such, we consider the allocation of the site for development would not conserve and enhance the HWNL, would be contrary to paras 189 and 190 of the NPPF, and we consider the site should not be allocated for development in the Rother District Local Plan.
PE3	Tanyard, Main Street, Peasmarsh	15 dwellings	<i>No objection in principle subject to only the northern part of the site being developed, and the other general site-specific comments on our reps letter being addressed.</i>
PE5	Malthouse Business Park, Peasmarsh	(a) 6 dwellings (b) 400 sqm employment floorspace	<i>No objection in principle subject to the other general site-specific comments on our reps letter being addressed.</i>
Playden			
PL1	Land South of Poppyfields and Corner House, Playden	25 dwellings	Setting of HWNL OBJECT: The site is highly visible from the A268 Rye Road, which divides the site from the HWNL, and as such there is strong intervisibility. Development of the site would result in the encroachment with extensive built form into open undeveloped fieldscape which presently contributes positively to the landscape character of the setting of the HWNL. It would inevitably result in an urbanising incursion into the rural landscape of the HWNL, uncharacteristic in this hamlet location. The allocation is therefore not considered to constitute sensitively located development (as per NPPF para 189), and the development of the site would not conserve or enhance the setting of the HWNL. As such, we consider the site should not be allocated for development in the Rother District Local Plan.
PL2	Land between Saltcote and The Steps, Playden	14 dwellings	Setting of HWNL. <i>No comment – by virtue of distance and separation by built form, site not considered to contribute to setting of HWNL.</i>
Robertsbridge			
RB1	Land south of Heathfield Gardens, Robertsbridge	25 dwellings (over and above the 40 allocated in the Robertsbridge NP)	Part of this proposed site is the subject of a current planning application for 42 dwellings (RR/2025/1438/P), which aligns with the area allocated for development in the Robertsbridge NP. The proposed allocation would constitute a significant extension southwards (up the slope) from the site allocated in the Robertsbridge. We cannot comment further on the suitability of this site, and impacts on the HWNL, without the benefit of Landscape Sensity Studies , which would need to include consideration of the elevated topography of the site, and its wooded nature, prior to allocation.

Reg 18 Local Plan reference	Site name	Development quantum	HWNL Unit comments
RB3	Land at Grove Farm (Phase 2), Robertsbridge	70 dwellings	<p>MAJOR</p> <p>We cannot comment further on the suitability of this site, and impacts on the HWNL, without the benefit of Landscape Sensity Studies, which would need to include consideration of the topographical setting of the village, and that the southern part of this site is on highly elevated ground. The linear nature of site, running between existing development and the A21 road could be considered to reduce the impact of development here on the HWNL, subject to the further studies prior to allocation.</p>
RB6b	Openfield, north of Northbridge Street, Robertsbridge (extension to Hodson's Mill site)	50 dwellings	<p>MAJOR</p> <p>Though we advise this allocation should be considered major development under NPPF 190, (particularly when considered cumulatively with RB6a), and therefore there would be a presumption against it. we note that the allocation proposes only development limited to that which is demonstrated to be necessary to facilitate the appropriate redevelopment of the Mill Site (RB6a) in viability terms.</p> <p>It is presumed that that redevelopment includes the restoration of both the listed oasthouse and the historic mill (a non-designated heritage asset. This could potentially be a consideration that would constitute 'exceptional circumstances and public benefit' under NPPF para 190. However, policy text should make clear that this site could only come forward as part of comprehensive package with the redevelopment of RB6a including the restoration of both the listed oasthouse and the historic mill, and clarifying that phasing conditions would apply to ensure the delivery of this.</p> <p>As set out in the supporting text, the site displays a number of the key characteristics of natural beauty as defined in the HW AONB Management Plan; a medieval field bound by historic field boundaries, and a historic PROW. We cannot comment further on the suitability of this site, and impacts on the HWNL, without the benefit of Landscape Sensity Studies, which would need to include considering the impact of development on these key characteristics, and on the historic settlement pattern around the Conservation Area of Northbridge Street, prior to allocation.</p>
Sedlescombe			
SD8	Marley Lane Business Park, Sedlescombe	2400 sqm employment floorspace	<i>Extant permission for this site – no comment.</i>
SD10	Land north of Gorselands, Sedlescombe	15 dwellings	<p>We cannot comment further on the suitability of this site, and impacts on the HWNL, without the benefit of Landscape Sensity Studies. – we note that the HELAA LSA advised that '<i>Whilst most aspects of the site have a medium to high sensitivity there may be potential for a small number of houses on the site to the east of Gorselands. As this would need to be in character with the existing low-density development the number of houses would be restricted to 5 or 6.</i>' However, that does not appear to be what is proposed in the draft allocation.</p>

Reg 18 Local Plan reference	Site name	Development quantum	HWNL Unit comments
SD11	Land north of Brede Lane, Sedlescombe	38 dwellings	<p>MAJOR</p> <p>This scale of development in this location should be considered major development under NPPF 190, and therefore there would be a presumption against it.</p> <p>OBJECT: The existing woodland to the west of the site forms a distinct eastern edge to village on northern side of road. The site is identified as part of a medieval field system (Early Post-Medieval fields AD 1500– AD 1599), and is bound to the north-east by Ancient Woodland, key character components of the HWNL’s natural beauty set out in the Management Plan.</p> <p>Development of this site would be highly intrusive into the HWNL landscape on the presently undeveloped side of the road, and would result in the encroachment with built form into open undeveloped fieldscape which presently contributes positively to the landscape character of the HWNL and the rural setting of the village. The existing development on the southern side of the road (East View Terrace) is not considered to set a precedent for development on northern side of Brede Lane – indeed it appears incongruous in the landscape and not something that should be exacerbated by being repeated on the northern side.</p> <p>As such, we consider the allocation of the site for development would not conserve and enhance the HWNL, would be contrary to paras 189 and 190 of the NPPF, and we consider the site should not be allocated for development in the Rother District Local Plan.</p>
Staplecross			
SC1	Land east of Stockwood Meadow, Northiam Road, Staplecross	25 dwellings	<p>We cannot comment further on the suitability of this site, and impacts on the HWNL, without the benefit of Landscape Sensity Studies. Though a relatively large allocation, there could be potential for development of this site without adversely impacting on settlement form, sitting between the recent Stockwood Meadow development and the ribbon development to the east of the site. The site, though in character a valuable part of the HWNL landscape, contributes less to the rural setting of the village than other sites. However, prior to allocation, the LSS will need to consider the matters raised in the HELAA LSA, which says that <i>‘The site contributes to the rural character of the area and the sloping topography makes it more susceptible to views from across the small valley and the PROW.’</i></p>
SC2	Land east of Hop Gardens, Northiam Road, Staplecross	8 dwellings	<p>OBJECT: Development of this site would be highly intrusive into HWNL landscape. Notwithstanding the sporadic ribbon development on the southern side of the road here, the relatively recent exception site of Hop Gardens, forms a clear and legible boundary to the eastern edge of the settlement. Development here would result in a significant incursion with built form into an open gap of undeveloped fieldscape that contributes positively to character and natural beauty of the HWNL, and adversely impacting on settlement form and setting. Exception sites should not in themselves set a precedent for further adjacent development on the basis of the existing ‘exception’ development.</p> <p>As such, we consider the allocation of the site for development would not conserve and enhance the HWNL, would be contrary to para 189 of the NPPF, and we consider the site should not be allocated for development in the Rother District Local Plan.</p>

Reg 18 Local Plan reference	Site name	Development quantum	HWNL Unit comments
Ticehurst			
SG1	Land at Lynden Lane, Stonegate	5 dwellings	No objection in principle subject to the other general site-specific comments on our reps letter being addressed.
SG2	Land east of Bardown Road, Stonegate	20 dwellings	No objection in principle subject to the other general site-specific comments on our reps letter being addressed. Landscape Sensitivity work prior to allocation will need to consider the appropriate access location into the site to minimise impacts on the HWNL.
TC1	Land at Steellands Farm, Field Rise, Ticehurst	54 dwellings	<p>MAJOR</p> <p>This scale of development in this location should be considered major development under NPPF 190, and therefore there would be a presumption against it.</p> <p>OBJECT: Allocation of this extensive site would conflict with settlement pattern of the area, and would significantly urbanise the rural setting of the village to the south. The settlement extension would be highly uncharacteristic of the patten of growth of the village and its morphology, and the north part of the site in particular would extend the settlement deep into undeveloped countryside in an uncharacteristic and inappropriate way.</p> <p>We are also concerned with the supporting text in the draft policy; The fact that a site is ‘enclosed from the wider High Weald Landscape ’ is not unusual for the HW landscape – in fact its highly typical of the small-scale landscape character, with an intricate and scenic mosaic of small, irregularly shaped fields often bounded by hedgerows, shaws and small woodlands, as defined in the AONB Management Plan. Our data shows the fields on this site are bound by historic field boundaries. That a site might not be widely visible across the wider HWNL should not be considered a justification for major development, and does not diminish the potential adverse impacts of the development on the natural beauty of the HWNL. Also, the High Weald Housing Design Guide is clear that new screening planting should not be used to inappropriately located development that is not well-integrated into the landscape.</p> <p>Development of the site would result in the significant encroachment with extensive built form into the open undeveloped fieldscape and would inevitably result in an urbanising incursion into the rural landscape of the HWNL. The allocation is therefore considered to be contrary to objectives S1, FH2 and PQ2 of the High Weald AONB Management Plan. As such, we consider the allocation of the site for development would not conserve and enhance the HWNL, would be contrary to paras 189 and 190 of the NPPF, and we consider the site should not be allocated for development in the Rother District Local Plan.</p> <p>There may be potential to look for more limited development on the southern field only, i.e. immediately north-west of the B2087, and a Landscape Sensitivity Study should investigate this potential only, with regard to impacts on the HWNL, prior to considering the proposed allocation further.</p>

Reg 18 Local Plan reference	Site name	Development quantum	HWNL Unit comments
Westfield			
WS2	Land east of Beaney's Lane, Hastings Fringes	70 dwellings	<p>MAJOR</p> <p>This scale of development in this location should be considered major development under NPPF 190, and therefore there would be a presumption against it.</p> <p>We cannot comment further on the suitability of this site, and impacts on the HWNL, without the benefit of Landscape Sensity Studies. We note that the HELAA LSA set out that <i>'There may be some scope for small scale development if this can conserve and enhance the AONB and create new or protect existing habitats'</i> and the LSS will need to explore this potential, for example the proposed quantum of 70 dwellings may not be appropriate, prior to allocation</p>
WS3	Land at Moor Farm, Westfield	50 dwellings	<p>MAJOR</p> <p>This scale of development in this location should be considered major development under NPPF 190, and therefore there would be a presumption against it.</p> <p>A small part of this site, at its northern edge, is allocated in the DaSA for 10 dwellings (WES3).</p> <p>We cannot comment further on the suitability of this site, and impacts on the HWNL, without the benefit of Landscape Sensity Studies. We note that the HELAA LSA set out that <i>'The open character and long views do increase sensitivity even though the character of the site is not particularly distinctive. There could be an opportunity for a small-scale development in the northern part of the site with a new defensible village edge and a well-defined landscape buffer on the boundary with the countryside.'</i> This potential will need to be considered in the LSS prior to allocation.</p>
WS5	Freshfields Farm, Westfield Lane, Westfield	2000 sqm employment floorspace	No objection in principle subject to the other general site-specific comments on our reps letter being addressed.
Total new proposed dwellings		2055 dwellings 23 sites of which are on sites for 30+ houses	