

11 March 2026
Our Ref: PL010-321/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
FRESHFIELDS FARM, WESTFIELD LANE, WESTFIELD
REPRESENTATIONS ON BEHALF OF MR AND MRS FOY**

On behalf of my client, Mr and Mrs Foy, I write to make submissions to the Rother District Regulation 18 Local Plan consultation. My client has control over the land identified in policy WS5 which is known as Freshfields Farm, Westfield Lane, Westfield.

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

- *Policy Reference WS5*
- *Development Needs: Economy*

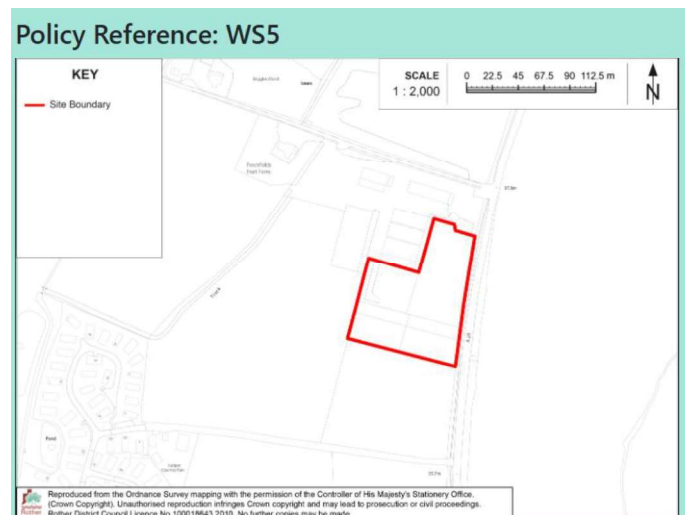


Figure 1: Land identified as Policy Red: WS5 Source: Draft Rother Local Plan

The policy details are set out below:

*'Site name: Freshfields Farm, Westfield Lane, Westfield
Site identification: New site identified through HELAA*

*Greenfield/ Brownfield: Part Greenfield, part Brownfield
Sub-area: Southern Rother and the Hastings Fringes*

*Allocated use and capacity: The site is allocated for employment development comprising:
Some 2,000sqm of new business floorspace (Use Classes E(g) or B8)*

Policy text:

Development on this site must:

Use the existing vehicular access from Westfield Lane (A28) subject to the approval of the Highway Authority;

Include appropriate pedestrian infrastructure inside and outside the site to link to the existing footways on the western sides of Westfield Lane;

Be informed by a landscape sensitivity assessment to determine an appropriate layout, form and detailed design to ensure the conservation and enhancement of the landscape and character of the High Weald National Landscape;

Be designed to be in keeping with the agricultural character of the site, including through the style of new buildings;

Retain and enhance the existing trees and hedgerows on the boundaries;

Provide a landscape buffer to the existing caravan park to the south;

Include any necessary off-site highway works necessary to make the development acceptable;

Include an assessment and evaluation of the site's archaeological potential and the implementation of any mitigation measures identified through the assessment.

Supporting text:

This site comprises two fields that form part of a larger network of fields, located in the countryside to the south of Westfield village. There are existing buildings within the site used for agricultural, business and retail purposes and the site is suitable for an expansion of the existing business uses. It is within the High Weald National Landscape and therefore a sensitive form of development is required in line with Local Plan policies. While the site is separated from Westfield village, further employment development here accords with national planning policy which supports the sustainable growth and expansion of business in rural areas, both through conversion of existing buildings and well-designed, new buildings, recognising that sites to meet local business needs in rural areas may have to be found adjacent to or beyond existing settlements. Notwithstanding this, connections to the existing footway infrastructure on Westfield Lane will encourage active travel, as detailed above.'

We agree with the proposed allocation for expanding the employment floorspace on site however suggest that the allocation is increased to allow for a larger scale provision to meet longer term requirements. The allocation confirms that a number of upgrades will need to be required to deliver the employment space, including highway and pedestrian access upgrades within the site and significant landscaping works. Given the values currently available for employment space, a larger floor area may be required to be able to make the delivery of high-quality units, alongside significant site upgrades, financially viable. A larger scale allocation also allows for longer term planning for the site to ensure the council can still demonstrate adequate employment space even if some other draft allocations or unimplemented planning consents fall away.

The uses included within the allocation are:

- *E(g): Offices, research & development and light industry*
- *B8: Storage and distribution*

This is supported however it is also suggested that some level of retail is also approved given the presence of some existing retail units on site. The supporting text states: There are existing buildings within the site used for agricultural, business and retail purposes and the site is suitable for an expansion of the existing business uses.' This therefore suggests that retail is also included however use class E(a) which caters for retail has not been included in the proposed uses in the policy wording itself.

Westfield Parish Council do not have a neighbourhood plan however the Settlement Spatial Survey on the Westfield Spatial Plan which was requested by the Parish Council in order to feed into their representation on the emerging Local Plan identifies the priorities of the local residents in terms of growth. Supporting local shops and facilities was identified as a priority item when planning future development. It is understood that there has been no need for additional retail floor space to be allocated however the draft plan is clear that in mixed use developments some retail floorspace may be appropriate and the lack of allocation does not prevent applications for retail uses coming forward. Given there is some retail on site and a range of employment uses have been proposed at Freshfields Farm, adding retail as an optional use within the allocation would provide more flexibility within the allocation and would allow the site to evolve and respond as needs and demands in the district changes. It is therefore proposed that the policy is amended to include use class E(a) which provides for the display or retail sale of goods, other than hot food, principally to visiting members of the public.

Based on the supporting evidence, Rother's employment requirement up to 2040 is 74,189sqm of new floorspace. While the plan has identified an excess provision of 97,774sqm of floorspace, this includes 66,924 of existing allocations and sites that already have planning permission and only 30,850 sqm of proposed new allocations. Nearly 70% of the total provision is therefore on existing allocations or sites with planning permission. There is an element of uncertainty over these sites as not all sites with planning permission will come forward for development with some being delayed, consents expiring unimplemented, sites proving unviable, or being secured for alternative uses. The motivations for seeking planning permissions can vary dependent upon the type of site with many planning permissions sought simply to increase value. Therefore, not all permissions will be implemented, and sites may become unavailable or simply retain the existing uses. It is therefore considered that the extent of reliance on existing permissions, with their inherent uncertainty as regards delivery, weakens the strength of the proposed supply of employment space. This further justifies the need to look at larger floor areas within existing draft allocations where the landowners have expressed a clear intention to deliver.

The employment requirement comprises a mix of office, industrial and storage and distribution units. The site already includes a mix of retail and commercial units and could easily provide further office, light industrial, retail and storage and distribution units in excess of the 2,000sqm proposed. There is ample land to allow for further expansion without having a detrimental impact on the farm or surrounding uses. Significant landscaping is proposed in the draft policy

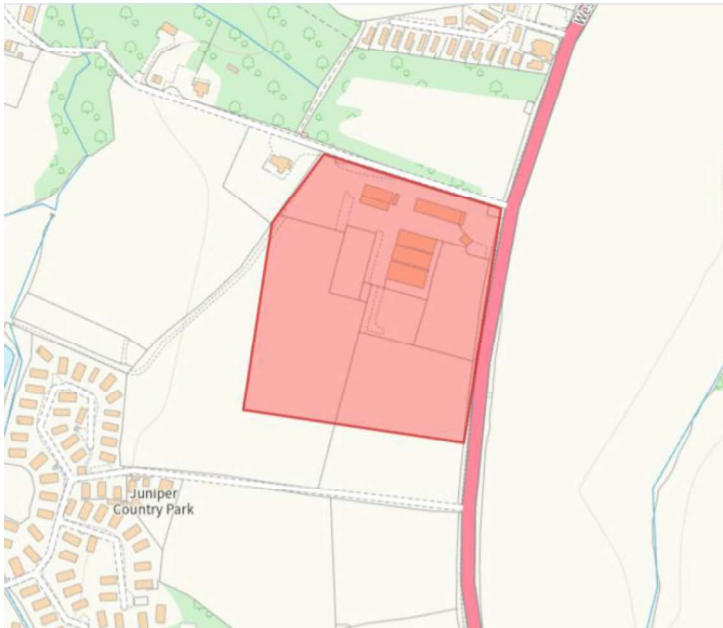
to minimise the impact of further development on the High Weald National Landscape and the nature of the uses allows for buildings that are agrarian in design and layout, meaning they are compatible with what would be expected within a National Landscape location. Buildings of this style, even at a significant scale, would have a less urbanising effect on the National Landscape than residential development and landscaping and good design would lessen the impact further.

The existing access to Freshfields Farm is large and established, on a stretch of straight road just before entering the village of Westfield from the direction of Hastings and there is significant existing hardstanding already in place. The location, next to Westfield and just 6 miles north of Hastings on the A28, with footpaths from the site in each direction, mean the site is a well-connected and sustainable location for this type of use. Westfield is identified as moderately sustainable in the Settlement Study, with 4 out of 5 essential services available and a regular bus service to a number of highly sustainable settlements. It is therefore considered a logical and sustainable site for larger scale growth of employment floorspace.

The Housing and Economic Development Needs Assessment (HEDNA) indicates that there is sufficient capacity to meet identified needs in full in office and industrial uses, however, there is a shortfall for storage and distribution floorspace and this is something that can be delivered at Freshfields Farm alongside other commercial uses. The 2024 revisions to the NPPF have placed a greater emphasis on emerging economic sectors and activities, and the need for planning policies to respond positively to the modern economy. This includes activities associated with the transport and handling of goods (including freight, logistics and warehousing). The substantial existing access off the A28 and the geographical proximity to Hastings makes this site a logical location for logistics and warehousing and it is therefore proposed that the allocation is extended to include a larger element of floorspace to accommodate this growing demand.

The larger scale employment allocations in the district are located in Bexhill on Sea and Rye Harbour, leaving a geographical gap in the centre of the district which could be met with a higher quantum of employment space at Freshfield Farm. Additionally, since the HEDNA was produced, 3 large sites in Rother that had outline planning permission for employment uses, have dropped out of the supply pipeline for various reasons. It is possible others will also fall away and therefore identifying more floorspace across the district than the minimum need would be prudent in ensuring there isn't an under delivery over the next plan period.

It is therefore proposed that the allocation is extended and squared off as shown below to allow for more commercial units to be provided on site while still providing an adequate separation between the holiday park, the entrance to the holiday park and the commercial site. The provision of the landscape buffer required in the draft policy wording would further soften the impact, as would sensitive, agrarian architecture to reflect the agricultural setting within the National Landscape.



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 faithfully

A black rectangular box redacting the signature of Harriet Richardson.

Harriet Richardson MRTPI