



Homes
England

Representations to Rother Draft Local Plan Regulation 18 Development Strategy and Site Allocations Consultation

Hodson's Mill and Open Field,
Robertsbridge (LPA ref: RB6a and
RB6b)

March 2026



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1. Introduction

The following representations are made in response to Rother District Council's (RDC) Regulation 18 consultation on their Draft Local Plan 2025 – 2042 Development Strategy and Site Allocations (January 2026).

These representations focus on sites RB6a (Hodson's Mill, Northbridge Street, Robertsbridge) and RB6b (Open Field, north of Northbridge Street, Robertsbridge) which are proposed for allocation within the Draft Local Plan (January 2026). Homes England propose that the Draft Local Plan consider Hodson's Mill (RB6a) and the Open Field (RB6b) as a combined site (herein referred to as 'Hodson's Mill' or the 'site') to reflect the ownership and scope of the forthcoming hybrid planning application. This combined approach is in line with the Draft Local Plan Policies RB6a and RB6b, which require development to come forward on both sites in tandem.



Figure 1: Site Location Plan

Specifically, these representations respond to the following questions in turn, within Section 3:

- Question 2 – Proposed Housing Target;
- Question 5 – Infrastructure Needs;
- Question 7 – Density;
- Question 8 – Proposed Overall Development Strategy;
- Question 14 – Northern Rother Proposed Vision and Strategy;
- Question 57 – Robertsbridge Proposed Site Allocations; and
- Question 69 – Interim Sustainability Appraisal.

These representations follow previous Homes England responses regarding Hodson’s Mill to RDC public consultations on their Draft Local Plan in July 2024 and September 2025 respectively (which are enclosed at **Appendix A** and **Appendix B** of this document).

2. Background

Homes England

Homes England is the Government's housing and regeneration agency. Our mission is to enable the delivery of high-quality, safe and sustainable homes and vibrant, inclusive communities through collaboration with the housing sector and local leaders.

Our Strategic Plan 2025-2030 sets out how we will use our expertise, funding, resources and influence to deliver better homes and places for the people who need them. To achieve this, we will:

- Significantly increase new housing supply and accelerate housing delivery across all tenures
- Enable the delivery of homes and mixed-use schemes on brownfield land, as part of local regeneration strategies
- Collaborate with partners and local leaders to enable development and regeneration that boosts local economic growth
- Ensure homes are safe, secure and decent, and residents safeguarded.

It is also our role to partner with local government and to work collaboratively with Local Planning Authorities to help tackle these challenges and enable the delivery of high-quality, sustainable new homes and regeneration.

Hodson's Mill and Open Field, Robertsbridge (LPA ref: RB6a and RB6b)

Homes England firmly welcome the re-inclusion of site RB6a (Hodson's Mill) and the new allocation of RB6b (Open Field) as proposed site allocations within the Draft Local Plan Regulation 18, confirming the Council's recognition of their suitability and deliverability to meet the future housing needs of Robertsbridge and the wider Rother District. It should be noted that RB6b was acquired by Homes England in March 2024 and therefore while the site reference includes reference to the previous owners 'Open Field', both sites are under Homes England's control and it is intended that these are brought forward comprehensively as a single site.

The sites are in a highly sustainable location for residential development due to ample services and good transport connections within Robertsbridge. The site is therefore wholly appropriate for residential led, mixed use development as proposed and detailed in Site Allocations RB6a and RB6b of this Regulation 18 Version of the Local Plan. Policy HO2 of the Salehurst and Robertsbridge Neighbourhood Development Plan 2016 – 2028 (July 2018) also allocates Hodson's Mill (RB6a) for a residential-led mixed-use development.

Homes England can confirm that both RB6a and RB6b are suitable, available and achievable for housing delivery. It has been demonstrated in previous Local Plan submissions (and through the ongoing planning application discussions) that a sensitively designed development can be achieved within the site that would conserve and enhance the High Weald National Landscape, would not unduly compromise the character and quality of the conservation area.

Application Progress

Homes England have been progressing pre-applications discussions with RDC since October 2024 and can confirm that a hybrid planning application across both sites will be submitted in April 2026. This

submission follows an extensive pre-application process, that has included consultation with key stakeholders and statutory consultees. The outcome of these discussions and supporting technical assessments confirm that there would be no unacceptable impacts resulting from the proposed development. The proposals have also been discussed with all key stakeholders including the Environment Agency, East Sussex County Council (ESCC) Highways, High Weald National Landscape Unit, National Highways, and the Local Lead Flood Authority.

Alongside the statutory and pre-application consultation, Homes England has undertaken extensive public consultation with the local community and Parish Council. This engagement has been extremely positive and constructive in ensuring the planning is aligned with the Neighbourhood Plan policies and will contribute positively to local development needs.

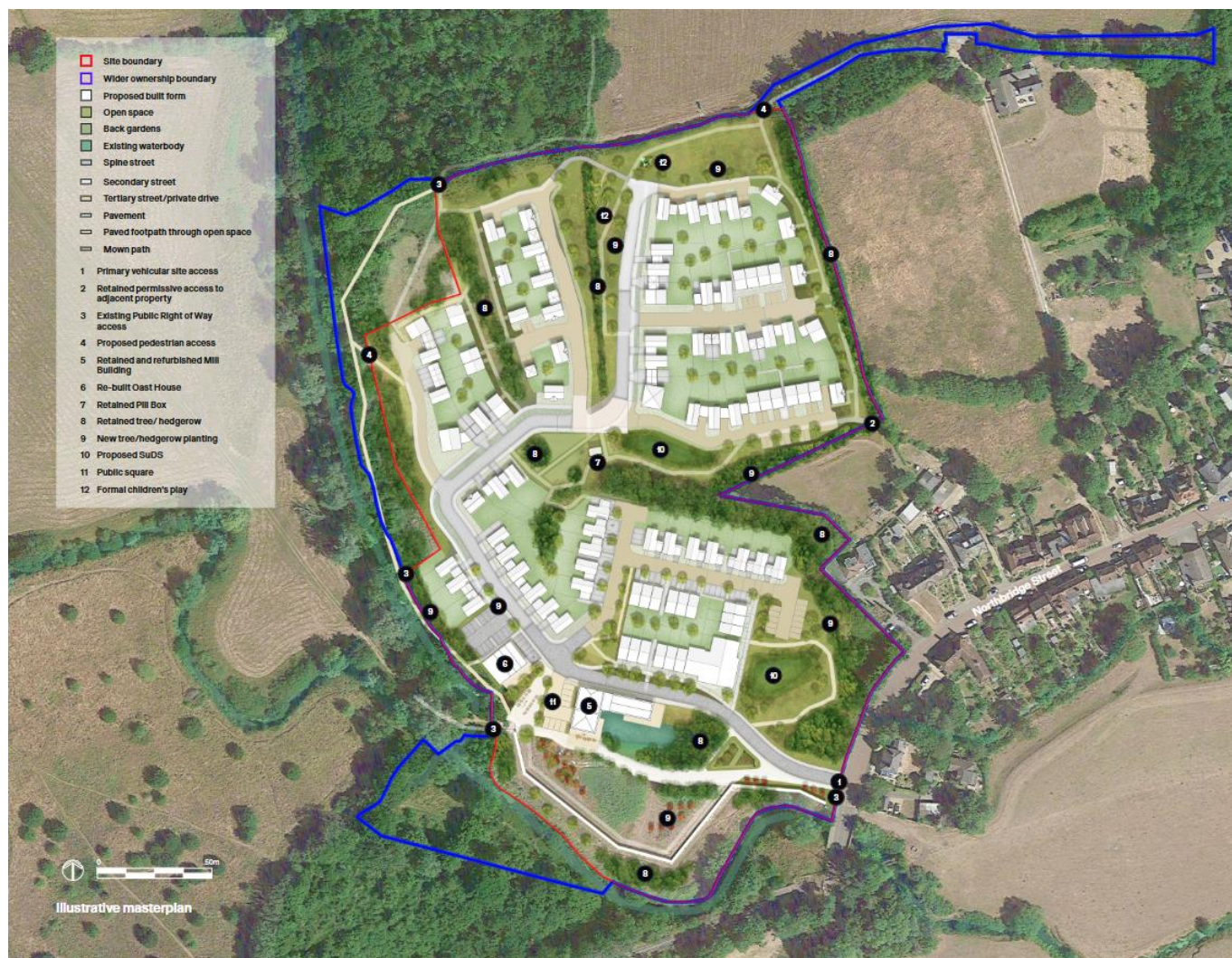


Figure 2: Indicative Masterplan for Hodson’s Mill (RB6a and RB6b) - February 2026

3. Response to Draft Local Plan Reg 18 Consultation

These representations have been structured according to the questions in the Consultation Draft.

Part 2, Chapter 3 - Development Needs

Question 2: Do you have any comments on the Council's proposed housing target for the Local Plan of 8,427 dwellings over the 17-year plan period, or 495 dwellings annually?

In line with paragraph 62 of the National Planning Policy Framework (NPPF), the minimum number of homes needed for an area across the Plan period should be informed by a local housing need assessment using the standard method. As recognised within the Consultation Draft, the housing need for RDC is a minimum of 912 dwellings a year, which we recognise is a significant increase against the housing requirement in the adopted Local Plan.

It is agreed that paragraph 69 of the NPPF requires authorities to establish a housing requirement figure for their area which identifies the extent to which the above housing need can be accommodated.

In this context, Homes England recognises the constrained nature of Rother District and therefore the Council's difficulty in meeting its full local housing needs. Given the challenges in meeting the identified housing needs, it remains vitally important that full support is given to the reuse of brownfield sites and that sustainable sites within or adjacent to rural settlements are fully utilised to contribute towards delivering on local and wider district housing targets.

Homes England supports RDC's approach in optimising the indicative development capacities of draft allocations, either through exploring extensions to existing allocations or through site optimisation. Hodson's Mill is one such suitably located site where we will support the council in achieving this, while remaining conscious of market demand and ensuring the policies are deliverable.

Part 2, Chapter 4: Infrastructure Needs

Question 5: Do you have any comments on infrastructure needs or priorities to support the proposed Development Strategy?

There is an urgent need to deliver homes in the district. It is also important to secure the timely delivery of infrastructure to support RDC's proposed development strategy and the delivery of housing sites, and Homes England support the use of an Infrastructure Delivery Plan (IDP) to do this.

However, the emerging Local Plan and the supporting IDP need to ensure that the infrastructure attributed to the draft allocations is proportionate, particularly for those that are already allocated for housing in the adopted Local Plan. Any infrastructure must meet the CIL Regulation 122 tests to be necessary to make the development acceptable, directly related to the development, and fairly and reasonably related in scale and kind to the proposed development. Given the advanced stage of the planning application, the infrastructure requirements for the allocation are now well understood.

In this context, there is a need for the IDP to be refined, as it sets out in paragraph 4.10, to clarify based on evidence the specific infrastructure that is required to be delivered or contributed towards for individual sites.

For example, the IDP currently identifies infrastructure to be delivered 'district-wide'. However, it is not clearly evidenced within the IDP or supporting evidence base that all development, including Hodson's Mill, would have an impact that would need to be mitigated by infrastructure items, beyond those that could be funded via CIL. The wider infrastructure requirements of the district should not hinder housing delivery on sites that are unrelated, can mitigate their own impacts and do not require this wider infrastructure to function in isolation, in line with the tests outlined in paragraph 58 of the NPPF. The IDP should therefore provide site-specific infrastructure requirements, rather than on a 'district-wide' basis to ensure that they are justified. This will also ensure that the IDP is effective in delivering the required infrastructure identified to support the proposed development strategy.

Specifically, for Robertsbridge, the IDP references a need for a new medical centre/ GP surgery, which has been funded partially from CIL payments and a third-party developer. We understand that works were due to commence in February 2026. There is no other infrastructure specified within the IDP for Robertsbridge.

Overall, we are supportive of contributing towards and/ or delivering infrastructure improvements which are supported by evidence (per NPPF paragraph 32) and meet the CIL Regulation 122 tests. Homes England recognises the IDP is a living document and will be reviewed as the emerging Local Plan and its evidence base progresses. We therefore reserve the right to review and comment on the IDP as the Local Plan progresses and more evidence becomes available to underpin the allocation of infrastructure.

Community Infrastructure Levy (CIL)

RDC adopted their CIL Charging Schedule in April 2016. To facilitate the above, the IDP Schedule (IDP Part B) should clarify which infrastructure requirements are to be funded by Section 106 and/ or CIL to ensure suitable funds are allocated and provide clarity for those bringing forward sites. This would provide total transparency regarding how infrastructure will be funded and will avoid double-counting of contributions.

Based on the Council's adopted Local Development Scheme (March 2025), we understand that the CIL Charging Schedule is to be reviewed alongside the production of the new Local Plan. We would welcome a discussion with RDC as we prepare the application for Hodson's Mill to understand how infrastructure will be funded, and we reserve the right to comment on this as the consultation takes place.

Part 3, Chapter 5: Preparing the Development Strategy

Question 7: Do you have any comments on the preferred approach for housing density shown in Figure 9, or on the updated Density Study (2026)?

Homes England supports RDC's proposed approach to optimising density on draft site allocations, where this is achievable and appropriate (i.e. in response to local context, including topography and surrounding landscape), to maximise the Council's opportunities to meet their housing need.

However, we are of the view that the policy wording within the Draft Local Plan should be amended regarding suitable housing densities to allow for site-specific variations to recognise and allow for differing local contexts. This will ensure that the Local Plan is in accordance with paragraph 129 of the NPPF which recognises the need for planning policies to support the efficient use of land, while maintaining an area's prevailing character and setting, securing well-designed and healthy places.

Homes England is supportive of the RDC’s preferred approach to progress Option B as outlined in the previous Regulation 18 Draft Local Plan consultation and in Figure 9 of this Draft Local Plan. However, the policy wording in the Draft Local Plan in relation to suitable housing densities should reflect the appropriacy of variations across development sites, to recognise the surrounding character and transitions across sites, such as in edge-of-settlement locations, site levels and market signals . This will ensure the Plan is in accordance with paragraph 129 of the NPPF which recognises the need for planning policies to support the efficient use of land, while maintaining an area’s prevailing character and setting, and securing well-designed and healthy places, as well as ensuring sites remain deliverable and able to make a meaningful contribution to RDC’s housing delivery over the Plan period.

For example, following pre-application discussions with RDC design and planning colleagues during the formulation of the Illustrative Masterplan for Hodson’s Mill (RB6a and RB6b), it was agreed that it would be more appropriate to make more efficient use of the development parcels and increase densities to reflect the existing tight-knit character within the village, and in order to maximise the amount and quality of green space across the Masterplan. This has resulted in an indicative gross density of 23 dph and net density of 52 dph across the site (see Figure 2 below), while Figure 9 sets a preferred density range of 25 – 45 dph for villages with development boundaries (applicable to the Hodson’s Mill site, which falls within this).

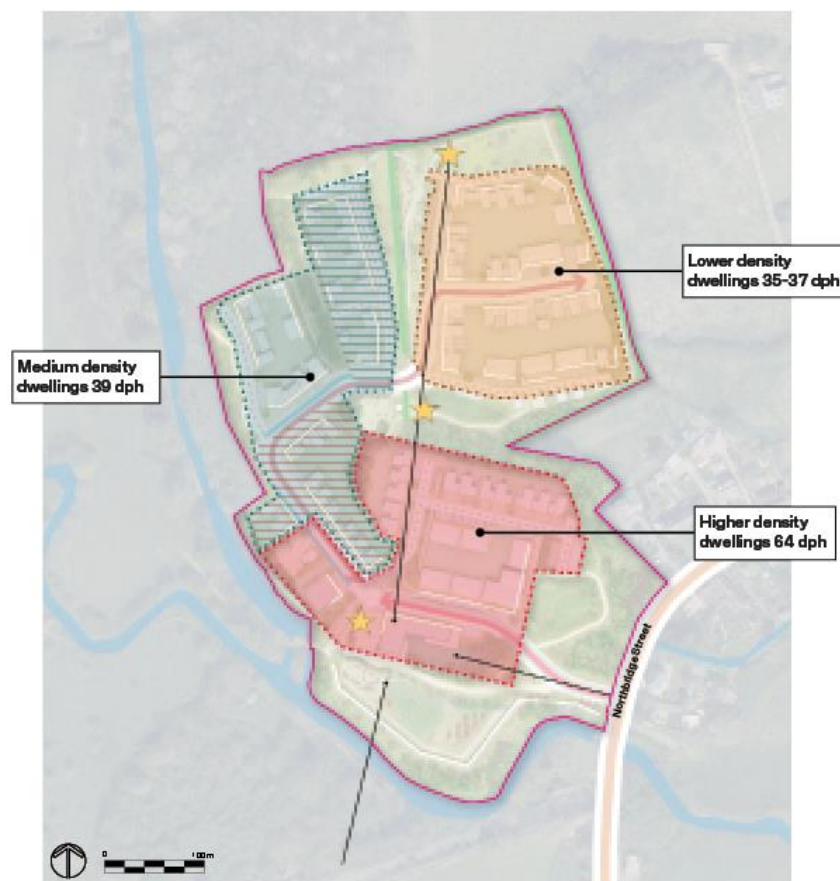


Figure 3: Hodson’s Mill – Housing Densities per Character Area (February 2026)

To this end, while the range of densities proposed are generally supported, the above demonstrates that any references to densities in the draft policy or emerging allocations should remain flexible to enable site-specific characteristics to be considered, while also promoting high quality placemaking by a design-led approach, meeting local needs and ensuring deliverability and viability.

Part 3, Chapter 6: Development Strategy for Rother

Question 8: Do you have any comments on the Council's proposed Overall Development Strategy?

Homes England supports the overarching development strategy including growth areas and specific sites of varying scales to meet RDC's housing needs. The proposed strategy is in accordance with paragraph 61 of the NPPF which outlines the importance of bringing forward a sufficient variety of land where it is needed and addressing the needs of groups with specific housing requirements.

In terms of the growth strategy, Homes England fully support RDC's approach to utilising sustainable rural settlements to bring forward development, if done sensitively. We understand the importance of a hierarchical approach and directing development towards the larger towns in Rother first, but it is critical that local housing needs are met in rural areas and that suitable and available sites within the most sustainable rural settlements are utilised. The proposed strategy recognises this important role, and specifically the role that Robertsbridge can play in the overall strategy.

Question 14: Do you have any comments on the proposed Vision and development strategy for Northern Rother, including the development figures shown in Figures 26 and 27? (Please note that comments on individual sites should not be made in response to this question, please see questions 53 to 63 instead).

Importantly, Figures 26 and 27 identify Robertsbridge as a 'good sustainability' settlement, which Homes England are fully in agreement with. The Call for Sites submission (September 2025), which is appended to these representations, provides information on the ample services (both social and infrastructure related) which contribute towards the sustainability of Robertsbridge, making it a very good rural settlement for future residential development.

However, Homes England query the appropriateness of the identified 1,200 sqm of new employment floorspace for Robertsbridge as set out in Figure 27. As stated in paragraph 6.91 of the Draft Local Plan, this relates solely to the proposed provision within the existing and proposed draft allocation at Hodson's Mill (RB6a). Through our comprehensive work on the planning application and completion of market testing, the delivery of 1,200 sqm commercial floorspace at this site is not feasible and we subsequently request that the proposed quantum is reduced in line with the planning application which indicates that a maximum of 150 sqm can be delivered on site. Further details on this are provided in response to Question 57 below.

Part 3, Chapter 7: Site Allocations

Question 57: Do you have any comments on the proposed site allocations in Robertsbridge, detailed in Policies RB1 to RB6b?

RDC's Draft HELAA (January 2026) has been updated to inform the Draft Rother Local Plan 2025-2042 Development Strategy and Site Allocations (January 2026). Both parts of the site (RB6a and RB6b) are assessed separately within the HELAA (January 2026) and a summary of RDC's site assessments are provided below:

- 1) **Hodson's Mill, Northbridge Street, Robertsbridge (SAL0045):** An allocated site with a development potential of 96 dwellings and 1,200 sqm employment floorspace. The anticipated timescale for development is within five years. Environmental constraints identified include the High Weald National Landscape, flood risk, ecology and heritage considerations.

- 2) **Open Field, north of Northbridge Street, Robertsbridge (SAL0046):** The site has been identified as *potentially* suitable, available and deliverable. The assessment of the site notes the viability constraints with redeveloping Hodson’s Mill (SAL0045) in isolation and the extension of the allocation to include the Enabling Land (SAL0046) would improve viability and secure the redevelopment of Hodson’s Mill to deliver residential dwellings. Furthermore, the site assessment states that development would need to be sensitively designed due to northern sections of the Enabling Land (SAL0046) being topographically prominent and the proximity to the Northbridge Street Conservation Area immediately to the south. The need to deliver this site alongside Hodson’s Mill (SAL0045) is acknowledged, particularly given the access requirements.

Homes England welcome the latest review of the HELAA (January 2026), are broadly in agreement with the assessment outcomes and support the inclusion of both sites together to ensure the delivery of the existing Hodson’s Mill site allocation. In future iterations of the Local Plan, the site should be taken forward as a single allocation reflecting the ownership and scope of the forthcoming application. It has been demonstrated in previous Local Plan submissions (and through the ongoing planning application discussions) that a sensitively designed development would conserve and enhance the High Weald National Landscape, would not unduly compromise those elements that have been identified as making an important contribution to the character and quality of the conservation area and that the sites are in a highly sustainable location for residential development due to ample services and good transport connections within Robertsbridge.

Hodson’s Mill (RB6a) and Open Field (RB6b) Draft Local Plan Policy Text Review

Homes England are very supportive of the proposed allocations. However, there are elements of the draft policy requirements for the future redevelopment of the combined site which we consider should be refined as follows:

Quantum of commercial floorspace

As indicated in response to Question 14, Homes England are clear through their extensive work done in preparing the planning application for the site that the requirement to provide 1,200sqm of commercial floorspace at the Hodson’s Mill site (RB6a) is unfeasible.

Firstly, through discussions with RDC’s heritage officers, it has been confirmed that the preferred future use for the Oast House would be residential as this allows for a more sympathetic conversion of the building and retention of the listed timbers. Therefore, this space envisaged for use as commercial space within the previous planning application for Hodson’s Mill is no longer available. Furthermore, soft market testing has clearly indicated that there is no discernible market to provide 1,200sqm of commercial space on site in this out of village centre location. Given the limited commercial market in Robertsbridge, there is a concern that any commercial space would compete with the existing high street and commercial uses elsewhere in village – something that is contrary to the objectives of the made Neighbourhood Plan (2018). This concern has also been raised by the local community through the engagement Homes England has undertaken in advance of submitting the planning application. The local community has highlighted a preference for smaller-scale community or commercial spaces rather than larger units with higher rental pressures and requirement to fill larger spaces. Requiring the delivery of employment at this scale may also have wider delivery impacts on the residential space as additional parking requirements, buffer areas and other restrictions on adjacent land uses would reduce the availability of space for residential development – contrary to both NPPF paragraph 124 and the

housing delivery and density objectives of the Plan and putting the overall deliverability of the site at risk.

Accordingly, the emerging planning application proposes the provision of circa 150 sqm of commercial floorspace on the ground floor of the converted Mill Building. The proposal creates an efficient arrangement of residential access and ancillary spaces while maximising opportunities for flexible commercial/ community units in key public ground floor locations within the Mill building. These spaces enjoy strong frontages onto Northbridge Street, the Mill Race, and the public footpath, and will be complemented by around 130 sqm of outdoor spill-out space, providing a combined potential of circa 270 sqm for community and commercial activity.

This approach ensures that new commercial uses are appropriately scaled so as not to compete with existing businesses in Robertsbridge whilst also maximising residential capacity of the site. Instead of large-format commercial floorspace that could detract from the High Street, the proposals support smaller, locally oriented spaces designed to reinforce and enhance the village's existing commercial offer.

On the basis of the above, Homes England recommend a review of the indicative capacity for employment floorspace within the draft allocation for Hodson's Mill (RB6a) as the delivery of 1,200 sqm employment floorspace is not feasible, where Homes England understand there is currently little to no appetite for within Robertsbridge following feedback from the local community.

Affordable Housing

Draft Local Plan Policies RB6a and RB6b require a policy-compliant level of on-site affordable housing to be delivered. Whilst Homes England's default position is to comply with affordable housing policies where feasible, it must be noted that there are a number of viability considerations associated with the redevelopment of the site, including site remediation, site levelling, costs associated with the conversion of the Mill and rebuild of the Oast House, and flood mitigation.

On this basis, it is unlikely that a policy compliant level of affordable housing will be possible and would expect appropriate levels to be determined through an updated Local Plan Viability Assessment. As such, we request that the policy wording be amended to reflect a supportable affordable housing level identified through an up to date Local Plan viability assessment and / or to include additional flexibility that any provision is 'subject to viability testing'. This flexibility in the policy wording will ensure that deliverability is prioritised and that the site does not remain vacant further into the future.

Emergency Vehicle Access

Draft Local Plan Policies RB6a and RB6b indicate the provision of a shared emergency access track to the north, based on previous flood modelling prepared by the Environment Agency (EA). Following further site analysis and additional flood modelling, the primary site access, if raised slightly, will now be sufficient as the sole means of access and egress in the event of a flood, and that the additional emergency access track is no longer required. This enhanced modelling has been issued to the EA for review and agreement and will be submitted in support of the forthcoming planning application.

On the basis of the above, Homes England consider that there is no longer a requirement to provide an additional access to accommodate emergency vehicles and we would therefore request that this policy requirement is removed from RB6a and RB6b.

Sustainability Appraisal

Question 68: Do you have any comments on the Interim Sustainability Appraisal in support of the Regulation 18 stage consultation on the Development Strategy and Site Allocations (January 2026)?

The Interim Sustainability Appraisal Report (January 2026) suggests that the appraisal found there to be a mix of likely positive, neutral and negative effects of the sites in Salehurst and Robertsbridge. The negative effects identified relate to biodiversity, landscape sensitivity, flood risk, heritage assets and access to services. As previously mentioned, the Call for Sites (September 2025) representations provided further details on the sites in relation to the proposed approach to landscape, flooding, heritage and the sustainability of the site regarding access to services. These representations provided some recommended amendments to the HELAA sustainability appraisal ratings and Homes England are pleased to see that Robertsbridge is now considered a 'good sustainability' settlement within the Draft Local Plan.

The emerging Masterplan for the site has taken into account all of the site's social, environmental and heritage constraints to ensure that the design is sensitive to the surrounding context. All of the suggested mitigation measures at paragraph 5.166 of the Sustainability Appraisal (January 2026) have been incorporated into the Masterplan and/ or appropriate assessments undertaken, to be submitted as part of the hybrid planning application to demonstrate that there are no negative effects arising from the proposed development. Any future updates to the Sustainability Appraisal should incorporate this additional evidence.

4. Summary and Conclusions

Homes England welcome and fully support the continued allocation of Hodson's Mill (RB6a) and the proposed allocation of the Open Field (RB6b) for residential-led development.

In future versions of the Draft Local Plan, the two allocations (RB6a and RB6b) should be considered as a single allocation, to align with the forthcoming planning application, which seeks to deliver up to 125 new homes. By combining the two allocations, the Plan would support the comprehensive delivery of a currently underused, majority brownfield site that will form a significant contribution to RDC's housing delivery within the rural area and Rother district, on a site that is fully supported by local stakeholders. The site as whole is suitable, available and achievable for residential development in the short-medium term and we welcome the site's inclusion within the Draft Local Plan.

As outlined in Section 3, Homes England have recommended minor amendments to the policy requirements stipulated within RB6a and RB6b to ensure that future development proposals remain deliverable and fully optimise the use of the site, while balancing the site-specific context and relevant constraints.

We understand that the Regulation 19 consultation will take place in Summer 2026, prior to submission of the Draft Local Plan to the Planning Inspectorate in December 2026. Whilst we note that the upcoming hybrid planning application submission will be submitted and hopefully positively determined prior to adoption of the Draft Local Plan, we will continue to promote and support the allocation of both sites throughout the Local Plan process. Homes England welcome the opportunity to engage in this round of consultation and will continue to collaborate with RDC to ensure that the development potential of these combined sites can be fully realised.

Appendix A: Rother District Local Plan 2020 – 2040 Regulation 18 Consultation Response (July 2024)



Homes
England

The Housing and Regeneration Agency

Responses to consultation:

Rother District Local Plan 2020 – 2040

(Regulation 18)

July 2024



1. Introduction

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

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

Executive Summary

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

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

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

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

Context

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

Homes England’s Role

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

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

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

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

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

Local Plan

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

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

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

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

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

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

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

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

2. Plan Making Context

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

National Policy

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

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

Environmental Constraints

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

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

Housing Need

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

Current Housing Delivery

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

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

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

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

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

⁴ Rother District Council Authority Monitoring Report, 2023

Affordability

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

Draft Local Plan

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

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

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

Robertsbridge

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

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

⁶ Rother Local Plan Core Strategy, September 2014.

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

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

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

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

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

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

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

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

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

⁷ ‘Draft Rural Settlements Study’, November 2008.

⁸ Approximately 8 dwellings per year

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

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

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

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

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

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

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

Responses to Consultation Questions

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

Section 5: Development Strategy and Principles

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

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

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

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

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

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

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

¹¹ see responses below to Q.54, 55

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

AND

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

¹² NPPF paragraph 70

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Landscape & Heritage Effects

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

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

A Heritage Statement¹⁴ was submitted with the Hodson's Mill Site planning application (RR/2017/382/P) which evaluated the significance of the Conservation Area, with consideration of the Conservation Area Appraisal. This did not identify the linear pattern of the settlement as an attribute of importance in the Conservation Area's significance, and moreover the Council should consider that approved scheme would itself fundamentally change the setting of the site and that part of the Conservation Area. SAL0024 would sit behind new development (in depth) and its presence would be largely filtered by mature landscape screening (including trees) along respective field boundaries. The approval of the Hodson's Mill regeneration demonstrates development of SAL0024 is achievable without significant effects on either the Conservation Area or the designated asset within the Mill Site. The 2024 Landscape Statement affirms this, concluding that with due attention to the scale and design of development it will not harm the setting of the Northbridge Street Conservation Area, retaining views south across the wider landscape.

Accessibility to Services

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Conclusions on Responses to Consultation Questions

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

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

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

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

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

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

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

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

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

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

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

APPENDIX A – Review of HELAA appraisal SAL003 and SAL0024

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

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

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

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

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

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

Landscape and Heritage Effects

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

¹⁵ RR/2017/382/P

¹⁶ Environment Agency Rother and Romney Catchment Flood Management Plan

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

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

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

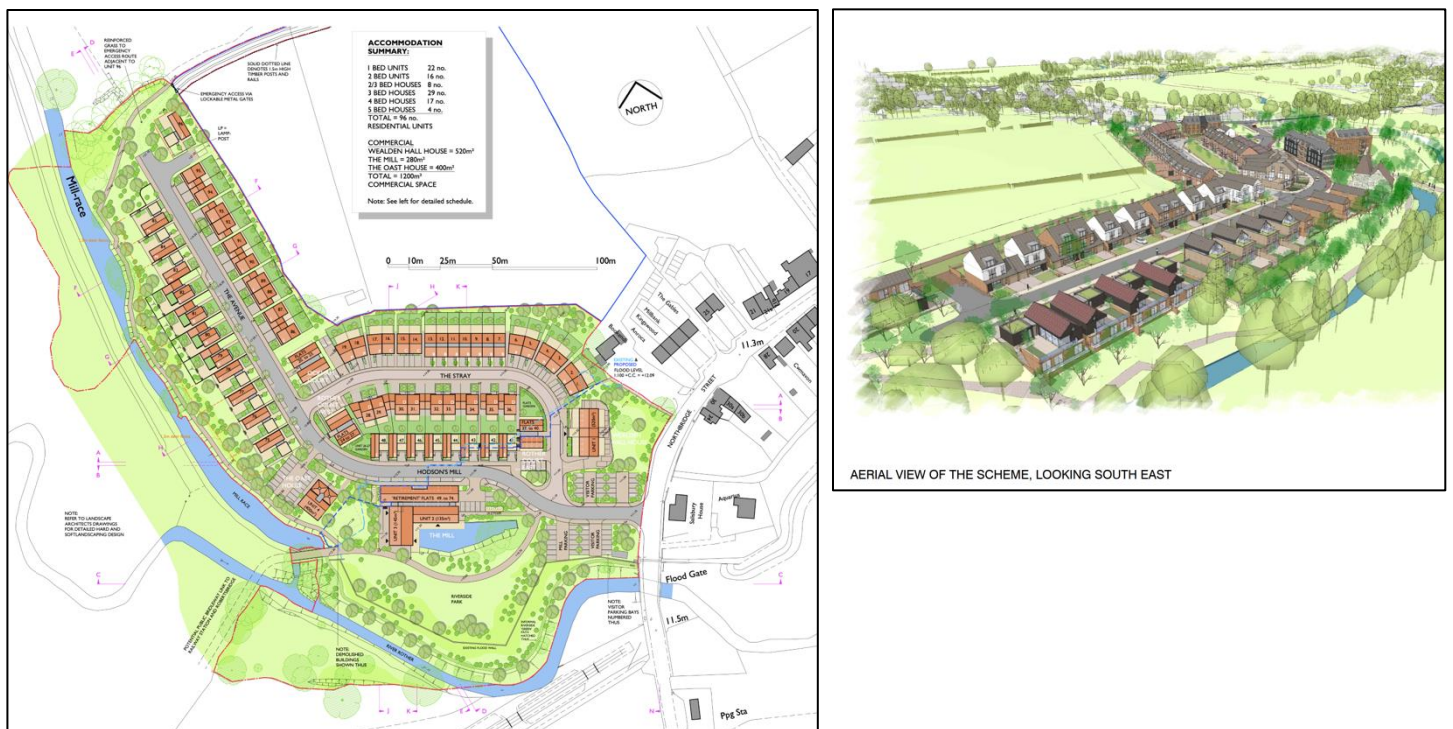


Figure 1 – Approved Scheme Layout & Illustrative View, Hodson’s Mill ref: RR/2017/382/P

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

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

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

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

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

The Council’s committee report observed;

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

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

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

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

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

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

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

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

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

Heritage Impact

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

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

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

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

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

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

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

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

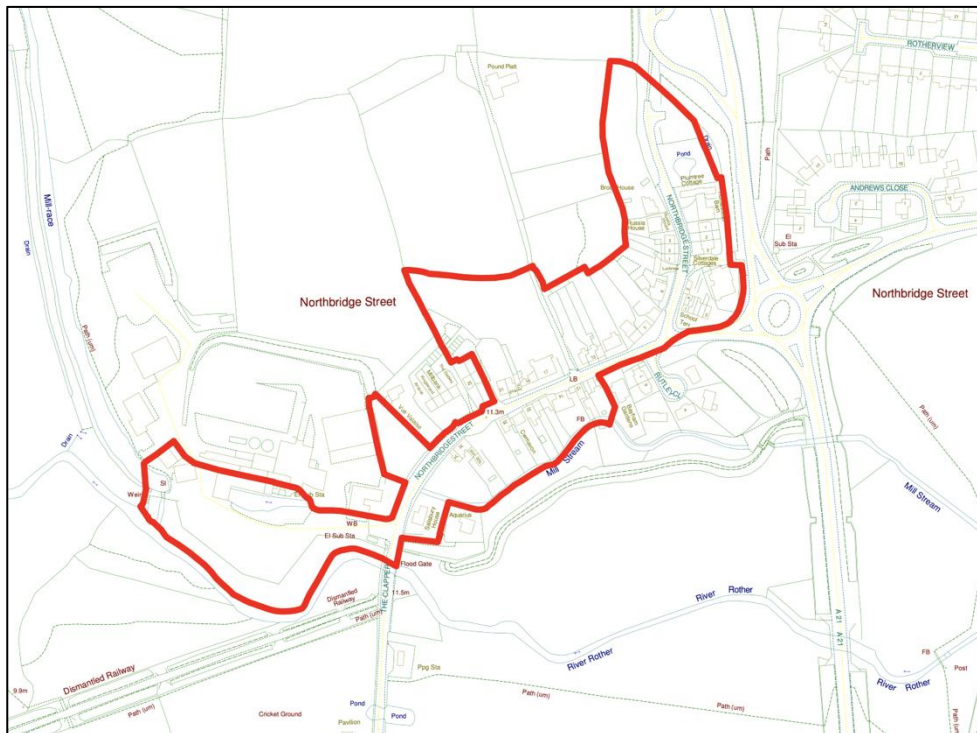


Figure 3: Extract from CAA, extent of Conservation Area (red outline)

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

Accessibility to Services

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



Figure 3 - Location of Key Facilities

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

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

The identified facilities are as follows:

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

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

Table 1 – Schedule of Facilities in Robertsbridge

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

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

Conclusion

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

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

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

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

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

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

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

Appendix B: Rother District Local Plan 2020 – 2040 Call for Sites – Housing and Economic Land Availability Assessment (HELAA) Representations (September 2025)



Homes
England

Rother District Local Plan 2020 – 2040

**Call for Sites - Housing and Economic
Land Availability Assessment (HELAA)**

September 2025



1. Introduction

The following representations are made in response to Rother District Council's (RDC) Call for Sites for the updated Housing and Economic Land Availability Assessment and further to recent engagement with RDC in July 2025. These representations focus on sites SAL0003 (Hodson's Mill, Northbridge Street, Robertsbridge) and SAL0024 (Openfield, north of Northbridge Street, Robertsbridge) as outlined with the Housing and Economic Land Availability Assessment (HELAA) (dated April 2024).

Details on both of the sites (referred to in this document as 'Hodson's Mill' (HELAA ref. SAL0003) and the 'Enabling Land' (HELAA ref. SAL0024) or the 'site') have been provided within the corresponding Site Identification Form (at Section 3 – Site Details). The Openfield, north of Northbridge Street, Robertsbridge (HELAA ref. SAL0024) is referred to as the 'Enabling Land' as it will provide the additional development needed to unlock the deliverability of the long-term vacant Hodson's Mill (HELAA ref. SAL0003). This document provides supplementary information to the Site Identification Form and to representations previously submitted on behalf of Homes England in July 2024 (referred to as the 'July 2024 Representations') in response to RDC's consultation on the Draft Local Plan (2020 – 2040) Regulation 18. A copy of the July 2024 Representations can be found at **Appendix A**.

Separately appended to complete these representations in full are:

- **Appendix B:** Hodson's Mill Landscape Assessment, prepared by The Environment Partnership (September 2025); and
- **Appendix C:** Site Boundary.

Homes England are the Government's housing and regeneration agency. Established in 2008, our mission is to drive regeneration and housing delivery to create high quality homes and thriving places. Our Strategic Plan 2023-2028 sets out how we will use our land, funding and expertise to deliver better homes and places for the people who need them. To achieve this, we will:

- Support the creation of vibrant and successful places that people can be proud of, working with local leaders and other partners to deliver housing-led, mixed-use regeneration with a brownfield first approach.
- Build a housing and regeneration sector that works for everyone, driving diversification, partnership working, and innovation.
- Enable sustainable homes and places, maximising their positive contribution to the natural environment and minimising their environmental impact.
- Promote the creation of high-quality homes in well-designed places that reflect community priorities by taking an inclusive and long-term approach.
- Facilitate the creation of the homes people need, intervening where necessary, to ensure places have enough homes of the right type and tenure.

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

Since the purchase of the site in March 2024, Homes England have been progressing planning application discussions with officers at RDC regarding the redevelopment of Hodson's Mill (HELAA ref. SAL0003) and the adjacent Enabling Land (HELAA ref. SAL0024). In the most recent meeting with RDC

Planning, Policy, and Housing Officers in July this year, we were offered the opportunity to provide an update to the site information already submitted as part of the Local Plan process.

We welcome this further opportunity to enhance and expand upon the previously submitted evidence that demonstrates the suitability, availability, and achievability of Hodson’s Mill (HELAA ref. SAL0003) and the Enabling Land (HELAA ref. SAL0024), and to demonstrate how both sites can deliver much needed housing within the forthcoming Draft Local Plan.

These August 2025 representations provide updated technical information to support the continued promotion of Hodson’s Mill (HELAA ref. SAL0003) and the adjacent Enabling Land (HELAA ref. SAL0024), demonstrating their suitability, availability, and achievability for residential development. We welcome further opportunities to update this with our progress going forward as the Development Plan through the Local Plan, and relevant Neighbourhood Plans evolve in the future.

2. Overview of Site Context and Planning History

Hodson’s Mill (HELAA ref. SAL0003) benefits from a site allocation (Policy HO2) in the Salehurst and Robertsbridge Neighbourhood Development Plan 2016 - 2018 (July 2018) for a “*mixed-use development including residential development and at least 1,200 sqm of employment space, including the conversion of the Mill building and the conversion and refurbishment of the listed buildings on site*”.

An extract of the Salehurst and Robertsbridge Neighbourhood Development Plan Proposals Map (2018) is provided at Figure 1 overleaf. Hodson’s Mill (HELAA ref. SAL0003) falls within the area shown in blue. The Enabling Land (HELAA ref. SAL0024) lies adjacent to the east and north of the western Development Boundary (shown in black).

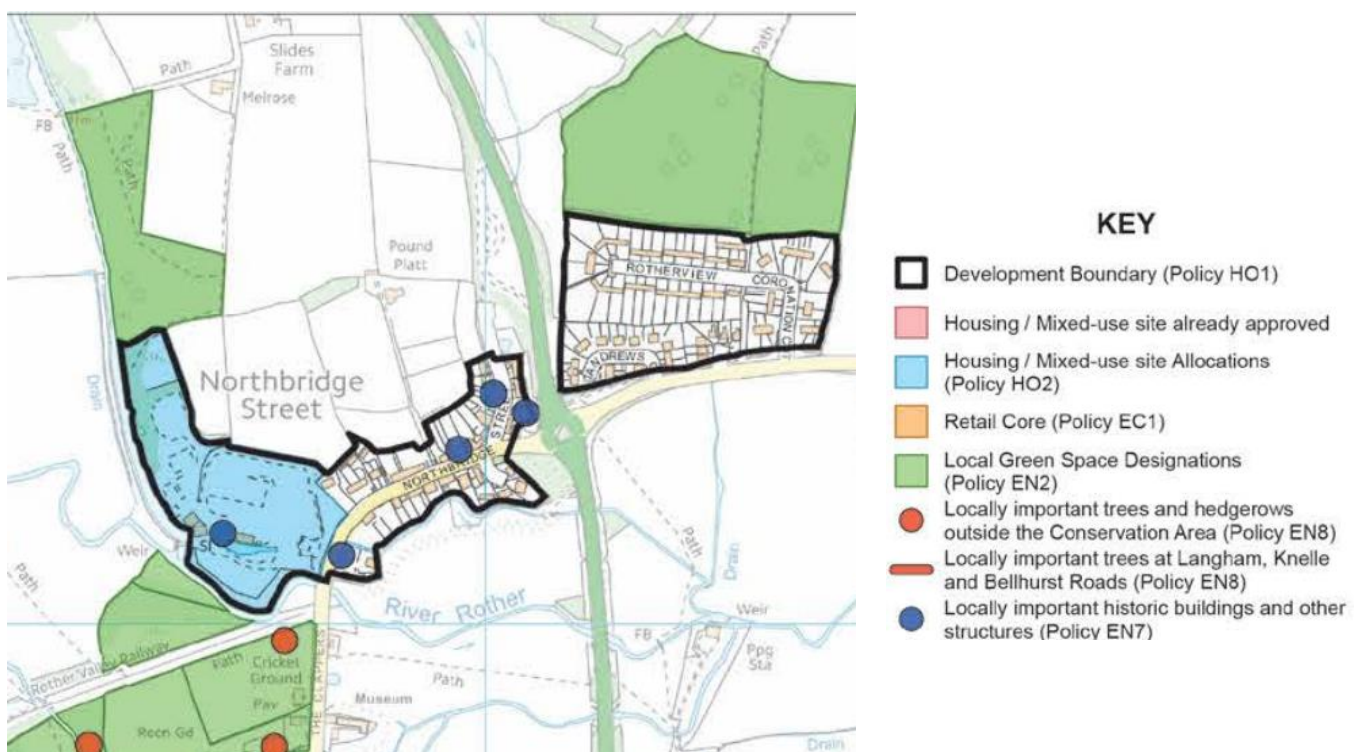


Figure 1: Extract from Salehurst and Robertsbridge Neighbourhood Development Plan Proposals Map (Map 4)

A recently lapsed planning permission (reference. RR/2017/382/P) was secured in July 2021 in accordance with this allocation for 96 residential dwellings (Use Class C3), 1,200 sqm commercial floorspace (now subsumed under Use Class E) and associated works". Whilst lapsed, this consent together with the site allocation for Hodson's Mill establishes the principle of redevelopment. A residential-led scheme was previously considered acceptable (subject to planning conditions) at the Hodson's Mill site, which presents a significant material consideration in favour of future redevelopment of the site. The approved site layout is shown at Figure 2 below. It is noted, however, that any future planning application will be assessed by RDC on its own merits, based on the Development Plan and other material considerations.



Figure 2: Hodson's Mill Lapsed Planning Permission (ref. RR/2017/382/P) Approved Site Layout

Since July 2024, Homes England have been undertaking technical studies and assessments to inform the preparation of a planning application for , Hodson's Mill and the adjacent Enabling Land (HELAA ref. SAL0003 and ref. SAL0024). Furthermore, at the end of 2024, Homes England undertook various public consultation exercises with the local community and other key stakeholders and were delighted by the level of engagement and constructive responses received to the principle of redevelopment at the site. Homes England's intention is to undertake the work required to submit a planning application, alongside developing a delivery strategy for the site across Autumn and Winter 2025, with submission of the planning application in early 2026.

The emerging development proposals seek to build upon the lapsed consent, to maximise housing delivery and ensure deliverability through the necessary incorporation of the additional Enabling Land (HELAA ref. SAL0024) whilst balancing the need to conserve and enhance the High Weald National Landscape (amongst other relevant planning and environmental considerations). Whilst the emerging proposals are not yet fixed, the technical work undertaken to date and the initial design feasibility suggests that the site could accommodate up to 150 dwellings, together with retention of the existing Mill Building and some community/ commercial floorspace. The Illustrative Masterplan can be seen at Figure 3 overleaf.

The emerging development proposals would deliver a host of public benefits to the local community, most notably the delivery of high quality private and affordable homes, green space and high quality landscaping, new community facilities (exact use is to be confirmed) and will generate direct and indirect economic opportunities.



Figure 3: Call for Sites Illustrative Masterplan and Legend

- Site boundary
- Existing building
- Existing building subject to further assessments
- Indicative Residential extent (Includes residential land uses, internal access streets, incidental green spaces, SuDS, planting, play and parking)
- Natural green space (includes informal play, planting, SuDS and footpaths)
- Amenity green space (includes equipped play, planting, SuDS and footpaths)
- Existing vegetation to be retained where possible
- Alignment of Historic hedgerow
- Existing water course / pond
- Indicative public realm / feature space
- Indicative strategic tree planting
- Proposed boundary planting
- Indicative vehicular access alignment
- Public Rights of Way
- Alignment of culvert
- Contour line
- * Indicative SuDS feature

3. Evidence Base Updates

HELAA (April 2024)

RDC's HELAA (April 2024) was published in support of the Regulation 18 Version of the emerging Rother Local Plan. Both parts of the site are assessed separately within the HELAA (April 2024) and a summary of the LPA's site assessments is provided below:

- 1) **Hodson's Mill, Northbridge Street, Robertsbridge (SAL0003):** An allocated site with a development potential of 96 residential dwellings and 1,200 sqm employment floorspace. The anticipated timescale for development is within five years. Environmental constraints identified include High Weald National Landscape, flood risk, ecology and heritage considerations.
- 2) **Land north of Northbridge Street, Robertsbridge (SAL0024):** The site has been assessed for its development potential, which is considered to *"form part of the rural setting of the village...development would represent encroachment into the National Landscape countryside and would not be in character with the existing settlement pattern"*. Environmental constraints were identified which largely relate to the High Weald National Landscape and other heritage considerations. It was also considered that the site was *"some distance to services in Robertsbridge"*. The site was therefore assessed as currently unsuitable/unavailable/unachievable and was rejected by RDC on this basis.

The position set out as part of these representations, the accompanying Site Identification Form, and the July 2024 Representations to the Regulation 18 consultation is that both parts of the site are indeed suitable, available, and achievable and should be positively identified in the forthcoming Regulation 18 version of the Rother Local Plan. Specifically, that both sites are able to accommodate sensitively designed residential development which would conserve and seek to enhance the landscape and setting of the High Weald National Landscape and Robertsbridge and Northbridge Street Conservation Area.

Furthermore, through pre-application discussions, RDC Officers have confirmed that the emerging development proposals across the site would not constitute 'major development' in the National Landscape as defined by Paragraph 190 of the NPPF. Nevertheless, we believe that there are exceptional circumstances that are in the public interest to justify the redevelopment of the site. These exceptional circumstances are three-fold and the most compelling relate to the acute local housing need and historic under-delivery across the district, including Robertsbridge, together with the significant benefits that will accrue from the redevelopment of this long-term vacant site in one of Rother's most sustainable villages. This is explored in further detail at Section 4 of these representations.

Homes England Regulation 18 Consultation Response - July 2024

As noted above, Homes England submitted representations for both Hodson's Mill (HELAA ref. SAL0003) and the Enabling Land (HELAA ref. SAL0024) in response to RDC's consultation on the Draft Local Plan (2020 – 2040) Regulation 18 consultation. A copy of the full representations is provided at **Appendix A** of this letter. These representations were made in response to the HELAA conclusions set out above. A summary of these representations made at the time is provided below:

- The Council’s Authority Monitoring Report (AMR) (December 2023) identified that the average housing delivery in the district had achieved only 204 dwellings per annum (district wide) since 2011/12. To meet the (then) housing requirement to the end of the plan period would rely on a step change in delivery which has not historically been achieved, including reliance on the timely delivery of strategic sites;
- The Regulation 18 Draft Local Plan 2020 – 2040 (April 2024) proposes an overall development strategy to achieve a range of delivery with a minimum of 5,158 and maximum of 7,287 dwellings, equating to 258 to 364 dwellings per annum. The top of the proposed range equates to just 50% of the minimum local housing need identified in the 2024 Housing and Economic Development Needs Assessment (HEDNA) (dated February 2024);
- On the basis of the above, a more robust examination of options to address the Local Housing Need would be required by the Council, in accordance with the National Planning Policy Framework (NPPF) to bring forth an ambitious, deliverable and positively prepared plan which will go on to meet the needs of Rother for the Plan Period;
- Robust evidence was provided to demonstrate that Robertsbridge is a sustainable location capable of accommodating additional growth than is currently identified;
- An allocation exists in the Salehurst and Robertsbridge Neighbourhood Development Plan (July 2018) pursuant to Policy HO2 for Hodson’s Mill (HEELA ref. SAL0003) for residential development and employment floorspace; and
- The adjacent Enabling Land (HELAA ref. SAL0024) can deliver additional housing in a sustainable location, which is suitable, achievable and available. The Enabling Land has moderate capacity for development, which could conserve and seek to enhance the National Landscape and the Robertsbridge and Northbridge Street Conservation Area with sensitive and well considered design and is a highly sustainable and accessible location.

Housing Policy and Evidence Updates

Since the July 2024 Representations were submitted on the Regulation 18 version of the Plan, there have been various policy and evidence base updates, which place greater importance on housing delivery and increase the housing need within Rother District substantially. These updates require RDC to identify additional housing sites and ensure a strong case is made for supporting suitable, available, and achievable housing sites, such as Hodson’s Mill and the adjacent Enabling Land (HELAA ref. SAL0003 and ref. SAL0024).

Firstly, the NPPF was revised in December 2024 and now emphasises the importance of housing delivery with the reintroduction of mandatory housing targets, five-year housing land supply (5YHLS) and a new Standard Method for calculating housing need.

We understand that the Rother HEDNA, last updated in February 2024, used the previous Standard Method to calculate Local Housing Need (LHN), resulting in a minimum figure of 737 dwellings per annum for Rother. However, this information has since been superseded by the latest Housing Land Supply and Housing Trajectory Position Statement (December 2024) which demonstrates that the LHN figure has increased to 932 dwellings per annum based on the new Standard Method calculation.

In addition, Paragraph 78(b) of the NPPF (2024) requires a 20% buffer to be applied to the supply of specific deliverable sites where there has been a ‘significant under delivery’ of housing for the previous three years as a means to improve the prospect of achieving the planned supply. Paragraph 79(b) of

the NPPF defines significant under delivery as 85% of the LPA requirement or below. Furthermore, Paragraph 79(c) states that where delivery falls below 75% of a LPA's requirement, the presumption in favour of sustainable development applies, in addition to the requirement for an action plan and 20% buffer.

The Rother Annual Monitoring Report 2023/24 (December 2024) published the 2023 Housing Delivery Test results. The report shows that in 2023/2024, there were 168 net completions within Rother. This is significantly lower than the 390 net completions in the previous year 2022/ 2023. The 2023 measurement for Rother was 43%, meaning the planning policy consequences of failing to meet local housing requirements are applicable. As outlined above, NPPF Paragraphs 78 and 79 require the preparation of an action plan, a 20% buffer to the 5YHLS calculations to be applied, and the presumption in favour of sustainable development when determining planning applications is therefore triggered.

It should also be noted that the rural area of Rother, and Robertsbridge specifically, has seen very limited housing in the past decade. Given 87% of Rother is within the National Landscape and contains 50% of the district's population, there is an acute need to direct new housing to rural areas, targeting the most sustainable rural settlements, and utilising available and suitable sites where they exist. Despite being a sustainable rural settlement with a train station, quality health and education provision, and numerous community facilities, there have only been five net small site completions between 2009 and 2019 (as of 1st April 2024), according to the HELAA. Additionally, the Salehurst and Robertsbridge Neighbourhood Development Plan Parish Analysis Study (June 2016) emphasises the limited net housing completions within Salehurst and Robertsbridge specifically, with only 20 completions for the period 2005 – 2014, demonstrating long-term under delivery. The document also emphasised the potential development capacity for the village, having identified 100 dwellings across newly identified sites, which would result in approximately 155 dwellings for the plan period 2011 – 2028. It is clear that sustainable rural areas have not been fully utilised to date, and there is capacity within them to contribute to RDC's overall housing supply to meet an identified need. RDC's aspiration to direct the majority of new housing to urban

In light of the recent Housing Delivery Test results, we are encouraged by the Council's most recent Call for Sites, seeking to meet the increased housing targets by requesting the submission of additional suitable, available, and achievable development sites to come forward as part of the Local Plan process. It is clear that a comprehensive review of available sites needs to be undertaken in order to bridge the gap of annual net completions. The Housing and Land Supply Position Statement (December 2024) suggests that there are currently 2,940 dwellings on identified sites that are considered to be deliverable (i.e. suitable and available). This represents a significant shortfall of 2,652 dwellings and a housing land supply of just 2.63 years, well below the required five-year threshold.

In terms of affordable housing needs, the HEDNA (2024) states that Rother has a total net annual affordable housing need of 325 dwelling per annum for the period 2021 – 2044. This housing need is exacerbated by the current waiting list for social housing within Rother. As of 1 January 2025, 1,398 households are on the waiting list for property. Whilst the affordable housing provision for the emerging development proposals is not yet fixed and will be subject to viability, the provision of much needed housing within a sustainable rural settlement will support RDC in meeting their housing targets.

The substantial and increased housing requirements together with the acute past and continued shortfall in delivery and supply in Rother District should be afforded substantial weight and signify exceptional circumstances in this case. The site would deliver much needed high quality private and affordable housing, seek to conserve and enhance nearby heritage assets and the National Landscape, unlock a disused site within Robertsbridge and provide green space/ landscaped areas, deliver a community use to enhance local social infrastructure and will generate direct and indirect income for the local economy. In response to this identified shortfall and updated policy requirements relating to housing delivery, all opportunities should be taken to explore the intensification and/or extension of allocated sites which have already been deemed sustainable options for housing development. The Hodson's Mill site allocation (HELAA ref. SAL0003) is one such allocation that we demonstrate below should be extended to include the Enabling Land (ref. SAL0024).

4. Further Technical Studies

The July 2024 Representations assert that Hodson's Mill and the adjacent Enabling Land (HELAA ref. SAL0003 and ref. SAL0024) are suitable, available, and achievable. Further technical work has been undertaken as part of developing a planning application for the site, which also strengthens the case in favour of an allocation at the site as a whole, incorporating both land parcels (HELAA ref. SAL0003 and HELAA ref. SAL0024). This technical work directly addresses the assessment outlined within the HELAA (April 2024) associated with the Enabling Land (ref. SAL0024) namely in relation to landscape and heritage concerns. The latest assessments undertaken provide strong evidence and justification which demonstrates that the Enabling Land is not unsuitable, unavailable or unachievable as RDC had previously concluded.

Landscape

To address the concerns raised in the HELAA (2024) regarding the impact of the sites on the High Weald National Landscape, an updated Landscape Statement (2025) has been prepared and is appended to these update representations (**Appendix B**). The Landscape Statement provides a clear overview of the existing landscape character and views within the area, alongside an initial consideration of where development might be accommodated and the potential impacts on the High Weald National Landscape based on the Illustrative Masterplan.

Whilst located in the High Weald National Landscape (formerly AONB), the site is relatively well contained by existing vegetation including hedgerows and trees along the site boundaries, woodland to the west and north and by built form to the south-east. These features generally foreshorten views towards the site and limit visibility from the wider landscape. The Landscape Statement (2025) provides viewpoint photography to give a visual indication of the visible extents of the existing site. The site is also situated within a relatively steep and narrow valley. Generally, the site slopes from north to south from a high point of 28.5m AOD along the site's northern boundary down to 10m AOD at the south of the site. The Landscape Statement (2025) notes that existing development in Robertsbridge generally does not extend beyond the 35m contour line, with development in Northbridge Street not typically extending beyond the 30m contour line. As the highest part of the site sits at 28.5m AOD, it follows the existing development patterns and would not breach the maximum AOD for built form within the surrounding townscape.

A Landscape and Visual Impact Assessment (LVIA) dated February 2017, was prepared by The Urbanists in support of the lapsed planning permission at Hodson's Mill (HELAA ref. SAL0003). The

LVIA confirmed that a landscape-led approach could mitigate adverse impacts on the surrounding landscape and National Landscape (formerly AONB). Whilst the Planning Committee Report provides RDC Officer's assessment of that scheme specifically, helpful conclusions can be drawn. Namely, that over 80% of the district lies within the National Landscape (formerly AONB) which includes the whole of Robertsbridge village and surrounding landscape, meaning any development around the edges would have some impact on its countryside setting which could affect the landscape character and quality of the National Landscape (AONB) to a degree. It was noted that Hodson's Mill (HELAA ref. SAL0003) previously contained large sheds and other industrial infrastructure which would have impacted the AONB. However, through the use of additional tree planting and screening, and careful consideration of the concentration of built development, the impacts to the National Landscape could be minimised and found acceptable. The updated Landscape Statement (2025) prepared by The Environment Partnership provides an assessment of both Hodson's Mill (HELAA ref. SAL0003) and the Enabling Land (HELAA ref. SAL0024) and demonstrates that the land has moderate capacity for development, which could conserve and enhance landscape and scenic beauty of the High Weald National Landscape if sensitively delivered.

Furthermore, Section 8 of the Landscape Statement (2025) provides an assessment of the special qualities of the High Weald National Landscape, with Table 2 providing an assessment against the AONB Management Plan Objectives. In relation to the AONB Management Plan Objectives, the proposals would give rise to either neutral or positive effects and on balance, would be acceptable in planning policy terms.

The NPPF (2024) at Paragraph 189 states:

“Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas”.

As set out above and in the accompanying Landscape Statement (2025), sensitively designed development at the site would conserve and enhance the landscape and scenic beauty of the High Weald National Landscape. The Illustrative Masterplan for the site places great importance on the conservation of wildlife and cultural heritage by setting aside large swathes of green space and landscaping to deliver significant biodiversity gains as well as the sensitive conversion of the locally listed building. Bringing back this long-term vacant and derelict site located within the conservation will deliver heritage benefits. The emerging development proposals bring a significant opportunity to deliver environmental enhancements at the site, including additional biodiversity and enhanced publicly accessible green spaces. Any future planning application will report on all of the environmental benefits of the scheme in full and this should be afforded weight by RDC when considering the merits of the proposals.

Paragraph 190 goes onto to state:

“When considering applications for development within...National Landscapes, permission should be refused for major development other than in exceptional circumstances, and where it can be

demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- a) The need for development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
- b) The cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and*
- c) Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated”.*

Footnote 67 of the NPPF states that what constitutes ‘major development’ in the context of Paragraph 190 is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.

Through pre-application discussions, RDC Planning Officers have confirmed that the emerging development proposals at Hodson’s Mill (HELAA ref. SAL0003) and the adjacent Enabling Land (HELAA ref. SAL0024) would not constitute major development in the High Weald National Landscape. In any event, we believe that exceptional circumstances exist that justify the redevelopment of the combined site, which would be in the public interest.

As set out in Section 3, the substantial housing requirements, the lack of current housing land supply, and the persistent under-delivery in the district and within Robertsbridge, collectively present exceptional circumstances. There is evidenced public interest in developing Hodson’s Mill demonstrated in the site allocation within the Neighbourhood Development Plan, with over 90% support, and the recent acknowledgement through the public consultation event in November that many local residents would accept the development of the Enabling Land (HELAA ref. SA0024) if it meant the redevelopment of the long-term vacant Hodson’s Mill.

A review of RDC’s Local Plan Sustainability Appraisal Main Document (April 2024) indicates that Hodson’s Mill (HELAA ref. SAL0003) was rated as having a neutral effect in terms of the natural landscape, while the Enabling Land was scored as having ‘*potentially significant adverse effects*’, as shown in Table 1 below. In light of the information above, we largely concur with the conclusions drawn for Hodson’s Mill (SAL0003), albeit believe there is scope for this to increase to a ‘green +’ rating, whereby ‘*effects may be minor*’. We consider that a neutral or minor effects (i.e. yellow/ green rating) is a more accurate reflection of the Enabling Land (HELAA ref. SAL0024) and its potential impacts on the High Weald National Landscape. A summary of this position, compared with RDC’s current assessment is provided within Table 2 below. We have demonstrated that development at the site would have the ability to conserve and enhance the High Weald National Landscape, increase access to the natural environment by unlocking routes through to the countryside and would enhance the existing natural environment through a thoughtful and localised landscape strategy which would introduce local species and ultimately, provide a net gain in biodiversity.

	HELAA Reference	Site Name, Settlement	Parish	(15) Natural Landscape
Rother District Council Local Plan Sustainability Appraisal (April 2024)	SAL0003	Hodson’s Mill, Northbridge Street, Robertsbridge	Salehurst and Robertsbridge	o
Homes England (September 2025 Representations) Rating	SAL0003	Hodson’s Mill, Northbridge Street, Robertsbridge	Salehurst and Robertsbridge	+

Table 1: Hodson’s Mill (HELAA ref. SAL0003) Sustainability Appraisal Rating – Natural Landscape

	HELAA Reference	Site Name, Settlement	Parish	(15) Natural Landscape
Rother District Council Local Plan Sustainability Appraisal (April 2024)	SAL0024	Openfield, north of Northbridge Street, Robertsbridge	Salehurst and Robertsbridge	--
Homes England (September 2025 Representations) Rating	SAL0024	Openfield, north of Northbridge Street, Robertsbridge	Salehurst and Robertsbridge	o

Table 2: Enabling Land (HELAA ref. SAL0024) Sustainability Appraisal Rating – Natural Landscape

Overall, it is considered that a sensitively delivered development on the site would conserve and enhance the landscape and scenic beauty of the National Landscape (High Weald AONB). When all the above points are taken together, the site’s location in the National Landscape is not an impediment to development. In fact, the redevelopment of the site can deliver on many of the Council’s key objectives for their forthcoming plan.

Heritage

The updated Landscape Statement (September 2025) also confirms that the site is able to accommodate sensitively designed residential development which would conserve and enhance the Robertsbridge and Northbridge Street Conservation Area. As such, no heritage impacts would exist that prevent the allocation of Hodson’s Mill (HELAA ref. SAL0003) and the Enabling Land (HELAA ref. SAL0024).

A Heritage Statement¹ dating from 2017 was submitted with the previous planning application (RR/2017/382/P) for Hodson’s Mill (excluding the additional Enabling Land) which evaluated the significance of the conservation area, with consideration of the Robertsbridge and Northbridge Street Conservation Area Appraisal (September 2009). Though the linear form of both Robertsbridge and Northbridge Street are mentioned within the appraisal document, this attribute is not mentioned in the context of being a contributing factor to its character or significance. Moreover, the previously approved Hodson’s Mill scheme (ref. RR/2017/382/P) would have notably changed the setting of the site and the Conservation Area. The Council have therefore accepted this position and when taken with the existing site allocation, this scale of development has been deemed by RDC to not have an unacceptable impact on the existing heritage assets. The Enabling Land (SAL0024) would sit behind

¹ Hodson’s Mill Heritage Statement, AAD Architects/Rapleys LLP, February 2017.

the area of land subject to the previous approval and its presence would be largely screened by the existing mature landscape (including trees) along respective field boundaries and as such would have no more impact on the setting of the Robertsbridge and Northbridge Street Conservation Area when compared to the previously approved scheme.

The previous approval at Hodson’s Mill (HELAA ref. SAL0003) demonstrates that development on this land parcel is considered by RDC to be achievable without notable effects on either the Conservation Area or the grade II listed designated heritage asset within the Mill Site. The Western Part of the former Oast House to Mill Farm is a Grade II Listed Building, located to the southern extent of the site with the land relevant to the previous approval forming the intervening space between it and the Enabling Land (HELAA ref. SAL0024). As such, the development of the Enabling Land (HELAA ref. SAL0024) would not change the setting of this heritage asset to a different or increased degree in comparison to the change in setting it would experience as a result of the approved scheme itself. Furthermore, due to the intervening Hodson’s Mill (HELAA ref. SAL0003) and the existing buildings on this part of the site, particularly the Mill Building, development on the Enabling Land (HELAA ref. SAL0024) would not be visible from the wider conservation area so no impacts are expected. The Landscape Statement (2025) provides the visual baseline at Section 3, which demonstrates that due to the existing vegetation and topography of the surrounding area, the site is well screened and there are limited views. Accordingly, the development of the Enabling Land (HELAA ref. SAL0024) would not result in new or different effects from a heritage perspective.

Following a review of RDC’s Local Plan Sustainability Appraisal Main Document (April 2024), it is understood that Hodson’s Mill (HELAA ref. SAL0003) was given a rating of ‘green +’ in respect of heritage, indicating that effects would be minor when considering the potential to protect and enhance heritage assets, encourage access to historic and cultural heritage and conserve and enhance historic landscapes and townscapes. We agree with the conclusions drawn by RDC, given that Hodson’s Mill is a locally listed building which forms a key part of the heritage of Robertsbridge. Homes England welcome the opportunity to retain and preserve this key landmark within the village. Table 3 below provides a comparison of RDC and Homes England’s assessment of heritage for Hodson’s Mill.

	HELAA Reference	Site Name, Settlement	Parish	(11) Heritage
Rother District Council Local Plan Sustainability Appraisal (April 2024)	SAL0003	Hodson’s Mill, Northbridge Street, Robertsbridge	Salehurst and Robertsbridge	+
Homes England (September 2025 Representations) Rating	SAL0003	Hodson’s Mill, Northbridge Street, Robertsbridge	Salehurst and Robertsbridge	+

Table 3: Hodson’s Mill (HELAA ref. SAL0003) Sustainability Appraisal Rating – Heritage

In contrast, the adjacent Enabling Land was assessed and received a rating of ‘neutral’. We would not anticipate that the Enabling Land would result in any additional impacts to heritage, when compared with Hodson’s Mill. On this basis, we would propose to align the rating with Hodson’s Mill (HELAA ref. SAL0024), as shown in Table 4 below.

	HELAA Reference	Site Name, Settlement	Parish	(11) Heritage
Rother District Council Local Plan Sustainability Appraisal (April 2024)	SAL0024	Openfield, north of Northbridge Street, Robertsbridge	Salehurst and Robertsbridge	o
Homes England (September 2025 Representations) Rating	SAL0024	Openfield, north of Northbridge Street, Robertsbridge	Salehurst and Robertsbridge	+

Table 4: Enabling Land (HELAA ref. SAL0024) Sustainability Appraisal Rating – Heritage

The Landscape Statement (2025) concludes that with due attention to the scale and design of development, it will not harm the setting of the Robertsbridge and Northbridge Street Conservation Area, retaining views south across the wider landscape and this conclusion is consistent with that of the 2017 Heritage Statement which stated “*although the development would represent a substantial introduction within the confines of the conservation area, it is considered that the development would not unduly compromise those elements that have been identified as making an important contribution to the character and quality of the conservation area*”.

Accessibility to Services

RDC’s HELAA (2024) assessment concludes that the Enabling Land (ref. SAL0024) is “some distance from services in Robertsbridge”. However, on review of RDC’s Local Plan Sustainability Appraisal Main Document (April 2024), the Enabling Land (SAL0024) received a ‘green +’ rating (as shown in Table 6 below), indicating a good level of accessibility to local services (including employment, public transport, education, health services and shops).

It should also be noted that the draft Local Plan sets out in Policy LWL2 RDC’s expectations for locational sustainability. This outlines different expectations dependent on the scale of settlement involved, with lower expectations for rural villages like Robertsbridge. Despite this, all of the qualifying facilities listed by the draft Policy LWL2 (and further additional facilities) are within 800m of the site, thereby meeting expectations for the largest settlements and is therefore considered to be a highly accessible and sustainable location, contrary to the conclusions reached by RDC in the HELAA 2024. We therefore agree with the conclusions outlined within the Sustainability Appraisal (2024), in light of the ample services within the immediate surroundings (see Table 7 and Figure 4 below for further details). Table 5 and 6 below provides an updated assessment of each individual land parcel in respect of the accessibility to services element of the Sustainability Appraisal (2024).

	HELAA Reference	Site Name, Settlement	Parish	(9) Accessibility to Services
Rother District Council Local Plan Sustainability Appraisal (April 2024)	SAL0003	Hodson's Mill, Northbridge Street, Robertsbridge	Salehurst and Robertsbridge	+
Homes England (September 2025 Representations) Rating	SAL0003	Hodson's Mill, Northbridge Street, Robertsbridge	Salehurst and Robertsbridge	+

Table 5: Hodson's Mill (HELAA ref. SAL0003) Sustainability Appraisal Rating – Accessibility to Services

	HELAA Reference	Site Name, Settlement	Parish	(9) Accessibility to Services
Rother District Council Local Plan Sustainability Appraisal (April 2024)	SAL0024	Openfield, north of Northbridge Street, Robertsbridge	Salehurst and Robertsbridge	+
Homes England (September 2025 Representations) Rating	SAL0024	Openfield, north of Northbridge Street, Robertsbridge	Salehurst and Robertsbridge	+

Table 6: Enabling Land (HELAA ref. SAL0024) Sustainability Appraisal Rating – Accessibility to Services



Figure 4: Location of Key Facilities

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

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

The identified facilities are as follows:

Number	Service	Description / Distance
1	Railway Station	Robertsbridge station is located 600m to the southwest of the site
2	Convenience Food Store and Post Office:	The convenience store and post office are 650m from the site. The shop sells a good range of product including fresh fruit and vegetables.

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

Table 7: Schedule of Facilities in Robertsbridge

In light of the above, we conclude that Hodson’s Mill (HELAA ref. SAL0003) and the adjacent Enabling Land (HELAA ref.SAL0024) are accessible, exceeding the goals of the draft Local Plan Policy LWL2 in accessibility terms.

We note that Robertsbridge is also well connected by strategic transport connections with regular bus and rail services. In contrast to other settlements in northern Rother, this provides opportunities for commuting and access to additional services. The services and facilities located within Robertsbridge are relied upon by other nearby settlements. All of this makes the settlement a highly sustainable location where, per Paragraph 83 of the NPPF , the Council should seek to promote housing delivery to “*enhance or maintain the vitality of rural communities*” and provide opportunities for Robertsbridge “*to grow and thrive*” and support villages nearby.

Flood Risk

Flooding is a key consideration for any future scheme on site and an emotive issue locally following historic flooding events. Considerable work continues to be undertaken to establish fluvial flooding mechanisms and how the proposed development can positively contribute to flood protection on the site and locally in the surrounding area.

The area benefits from flood defences (broadly opposite the Hodson's Mill site access). These are owned and managed by the Environment Agency and were installed in 2003. They comprise "1,160 m of earth embankment, 680 m of floodwalls and 430m of river realignment to protect the northern, central and southern parts of the town from river flooding"4. The adjacent land covered in SAL0024 is Flood Zone 1, and therefore at a low risk.

Flood risk consultants (Campbell Reith and JBA Consulting) have undertaken site-specific hydraulic modelling of the River Rother and adjacent Mill Race to establish fluvial flooding mechanisms and how the proposed development can positively contribute to flood protection locally. To date the work has identified a potential reduction in modelled flood extent within the site and the team are actively engaging with the Environment Agency to validate modelling and updated views on flood risk during late summer-autumn 2025. The results will be incorporated into the Flood Risk Assessment and sustainable drainage strategy for the proposed development that seeks to improve the current flood risk and drainage issues.

Development on SAL0024 would be accessed via the previously consented (and Neighbourhood Plan allocated) Hodson's Mill site (SAL0003) and its main access, which is within higher flood zones. The now lapsed planning permission for the adjacent Mill site established that both sequential and exception tests were passed for that scheme, and that safe access even during extreme flood events could be provided (via a secondary emergency access to the north, if found to be required following completion of flood risk modelling). This would also serve development in SAL0024. The EA management plan confirms that it is important that there is no increase in surface water run-off from new development and opportunities to reduce run-off should be explored. Development on SAL0024 would create a positive drainage situation, whereby in extreme storm events SuDS attenuation would assist in holding and releasing surface water run off at the ordinary greenfield rate.

It should be noted, however, that the previous lapsed planning permission was developed to the satisfaction of the Environment Agency and the LLFA and therefore flooding is not an impediment to the principle of residential development on combined site.

5. Planning Application Preparation

Since the July 2024 Representations, extensive consultation has taken place with RDC Planning Officers and the local community in Robertsbridge with the objective of submitting a planning application for the site in early 2026.

As such, Homes England have entered into a Planning Performance Agreement (PPA) with RDC to positively progress the formulation of a planning application at the site. Discussions to date have been positive and constructive, setting out the need and rationale for bringing forward the site (which includes the Enabling Land HELAA ref. SAL0024) and the challenges that Homes England are faced with to deliver a viable scheme.

Alongside these discussions, the first round of public consultation was undertaken during Autumn 2024. Homes England were delighted by the significant number of attendees across both consultation events and the level of local interest, much of which understood and supported the principle of redevelopment at Hodson’s Mill and the need to incorporate the additional land parcel (the Enabling Land, HELAA ref. SAL0024) . To supplement the in-person events, a dedicated Hodson’s Mill webpage was created. The webpage includes details about Homes England, the project, site, timelines and the consultant team. Further rounds of engagement are programmed for Winter 2025.

These pre-application discussions will intensify over the next few months, including statutory consultee meetings and further public engagement as we develop a hybrid planning application for the site ready for submission in early 2026. Considerable technical work is currently being undertaken in preparation for the submission of the planning application in early 2026. Further areas of work include ecology and BNG, heritage, landscape and visual impact assessment, EIA, sustainability, and viability. To date, there have been no findings which suggest that the site could not come forward for development in the short-medium term.

6. Summary and Conclusions

These updated representations follow positive discussions that have taken place with RDC Planning, Policy, and Housing Officers since July 2024. As agreed with RDC, we have provided relevant updates on Hodson’s Mill (HELAA ref. SAL0003) and the adjacent Enabling Land (HELAA ref. SAL0024) respectively, including key planning policy and RDC Evidence Base updates, together with summaries of the additional technical information that has taken place in recent months. These representations should be read alongside the corresponding Site Identification Form and the July 2024 Representations previously submitted on behalf of Homes England in response to RDC’s consultation on the Draft Local Plan (2020 – 2040) Regulation 18.

As noted in Section 3 of these representations, RDC now have a significantly enhanced LHN figure of **932 dwellings per annum** based on the new Standard Method calculation and only 2.63 years’ worth of housing land supply. The revised NPPF (December 2024) places an emphasis on new housing delivery, thereby intensifying the challenge before RDC. New sites must either be put forward by developers and other parties, or alternatively RDC should seek to maximise the development capacity for existing sites where possible to increase housing supply. We therefore welcome the opportunity to promote the site, incorporating Hodson’s Mill and the Enabling Land (HELAA ref. SAL0003 and SAL0024) site for a residential-led mixed use development.

As outlined within the Landscape Statement (2025), a co-ordinated design-led approach will allow for integrated mitigation measures, which would likely give rise to either neutral or positive effects on the High Weald National Landscape and Robertsbridge and Northbridge Street Conservation Area. A full Landscape and Visual Impact Assessment (LVIA) will be undertaken and submitted in support of any future planning application. The Enabling Land (HELAA ref. SAL0024) must be allocated within the emerging Local Plan to unlock much needed housing delivery within RDC which is entirely appropriate within the National Landscape. This land parcel is a critical element to safeguard the achievability and deliverability of residential-led development at the allocated Hodson’s Mill (HELAA ref. SAL0003). The site as a whole is suitable, available and achievable and will deliver a suite of public benefits to the local area.

We understand that there are a range of factors to consider when determining whether there are exceptional circumstances to justify development within the National Landscape and whether the

development is in the public interest, in accordance with Paragraph 1990 of the NPPF (2024). As outlined above, there are exceptional circumstances which are applicable to the redevelopment of this site. Full justification will be provided as part of a future planning application submission; however, the key exceptional circumstances identified at this stage are as follows:

- RDC continued shortfall against Housing Delivery Targets, which has resulted in a LHN of 932 dwellings per annum. Despite the Council's efforts, there have not been enough permissions granted or facilitated to meet housing needs.
- Whilst the exact affordable housing provision has not yet been fixed and will be subject to ongoing viability testing, there is a clear need for affordable homes within RDC, and this should be afforded substantial weight. The provision of new affordable homes will ease the existing pressure within RDC, with housing waitlist exceed 1,000 at the start of 2025.
- The emerging development proposals would have a positive impact on the local economy, from construction through to completion. The development would generate additional residents within the local area who would support and sustain local facilities and businesses.
- The Landscape Statement (2025) demonstrates that any effects to the environment and natural landscape would be neutral or positive. Considering the identified opportunities and constraints, the report concludes that the site is able to accommodate sensitively designed residential development which would conserve and enhance the landscape and scenic beauty of the National Landscape and Robertsbridge and Northbridge Street Conservation Area.

An enlarged allocation at Hodson's Mill, which is located in the sustainable rural settlement of Robertsbridge, provides a unique opportunity to provide much needed market and affordable housing into the rural area and on one of the largest brownfield sites in the district. It is a sustainable rural location, with good transport links to London (in walking distance of the railway station) and an abundance of social infrastructure facilities within close proximity. It offers the genuine potential to sustain and deliver many community benefits to local residents, bringing back into use a long-term vacant site, which if sensitively developed, would conserve and enhance the landscape and scenic beauty of the High Weald National Landscape and Robertsbridge Conservation Area.

Overall, by extending the allocation at Hodson's Mill (HELAA ref. SAL0003) and incorporating the much needed Enabling Land (HELAA ref. SAL0024) to create a deliverable development proposal, which should be included as an allocation within the forthcoming Local Plan. Development at the site would make a significant contribution to housing delivery within the rural area of Rother and the district as a whole, on a site that is supported by local stakeholders. The site is suitable, available and achievable for residential development in the short-medium term.

Appendix A: Copy of the July 2024 Representations



Homes
England

The Housing and Regeneration Agency

Responses to consultation:

Rother District Local Plan 2020 – 2040

(Regulation 18)

July 2024



1. Introduction

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

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

Executive Summary

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

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

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

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

Context

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

Homes England’s Role

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

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

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

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

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

Local Plan

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

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

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

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

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

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

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

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

2. Plan Making Context

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

National Policy

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

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

Environmental Constraints

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

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

Housing Need

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

Current Housing Delivery

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

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

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

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

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

⁴ Rother District Council Authority Monitoring Report, 2023

Affordability

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

Draft Local Plan

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

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

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

Robertsbridge

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

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

⁶ Rother Local Plan Core Strategy, September 2014.

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

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

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

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

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

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

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

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

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

⁷ ‘Draft Rural Settlements Study’, November 2008.

⁸ Approximately 8 dwellings per year

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

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

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

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

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

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

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

Responses to Consultation Questions

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

Section 5: Development Strategy and Principles

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

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

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

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

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

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

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

¹¹ see responses below to Q.54, 55

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

AND

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

¹² NPPF paragraph 70

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Landscape & Heritage Effects

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

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

A Heritage Statement¹⁴ was submitted with the Hodson's Mill Site planning application (RR/2017/382/P) which evaluated the significance of the Conservation Area, with consideration of the Conservation Area Appraisal. This did not identify the linear pattern of the settlement as an attribute of importance in the Conservation Area's significance, and moreover the Council should consider that approved scheme would itself fundamentally change the setting of the site and that part of the Conservation Area. SAL0024 would sit behind new development (in depth) and its presence would be largely filtered by mature landscape screening (including trees) along respective field boundaries. The approval of the Hodson's Mill regeneration demonstrates development of SAL0024 is achievable without significant effects on either the Conservation Area or the designated asset within the Mill Site. The 2024 Landscape Statement affirms this, concluding that with due attention to the scale and design of development it will not harm the setting of the Northbridge Street Conservation Area, retaining views south across the wider landscape.

Accessibility to Services

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Conclusions on Responses to Consultation Questions

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

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

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

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

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

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

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

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

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

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

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

APPENDIX A – Review of HELAA appraisal SAL003 and SAL0024

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

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

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

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

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

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

Landscape and Heritage Effects

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

¹⁵ RR/2017/382/P

¹⁶ Environment Agency Rother and Romney Catchment Flood Management Plan

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

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

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

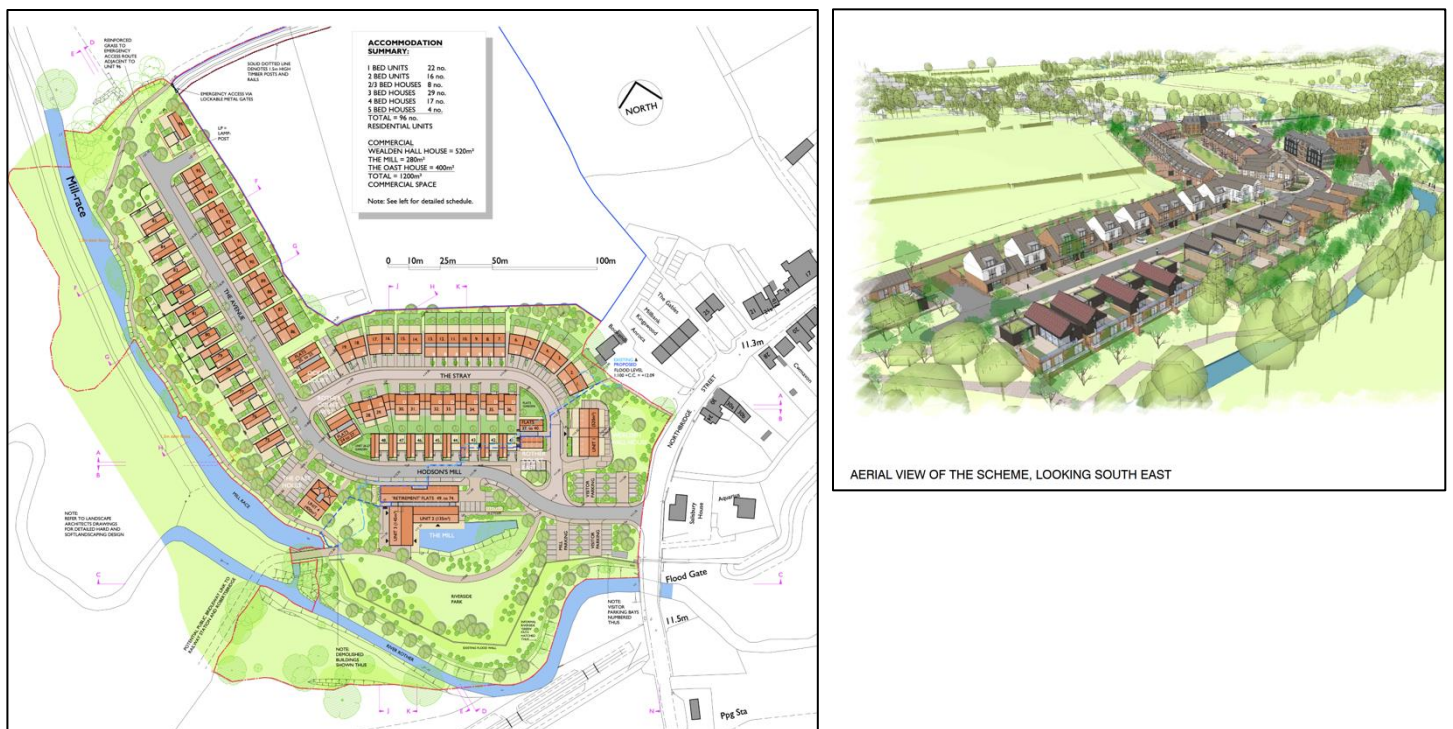


Figure 1 – Approved Scheme Layout & Illustrative View, Hodson’s Mill ref: RR/2017/382/P

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

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

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

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

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

The Council’s committee report observed;

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

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

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

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

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

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

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

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

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

Heritage Impact

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

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

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

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

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

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

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

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

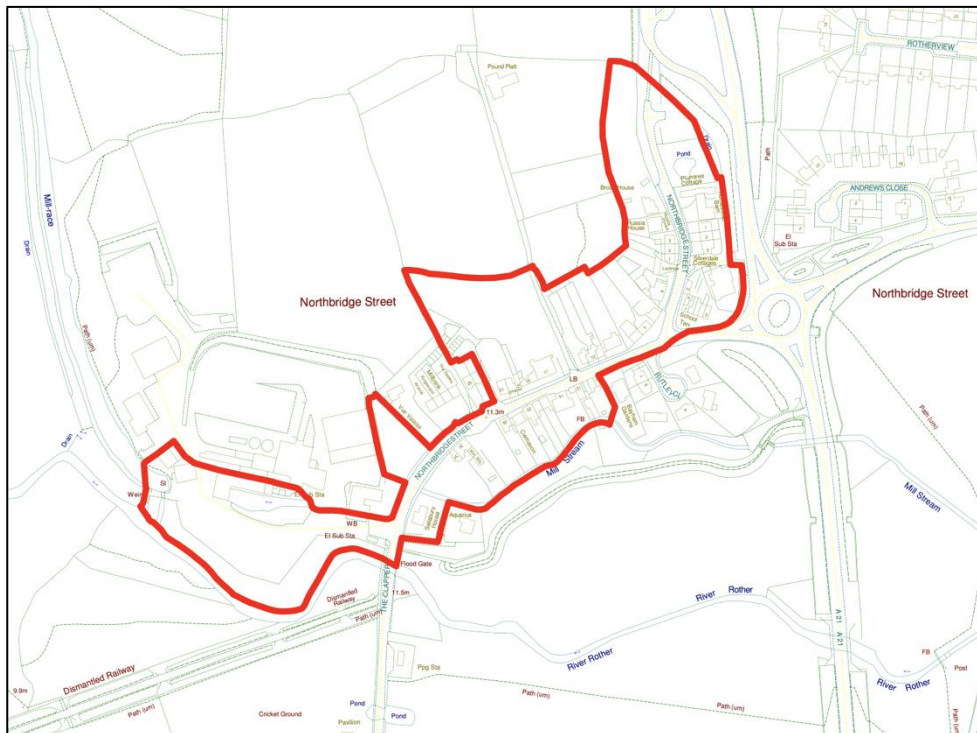


Figure 3: Extract from CAA, extent of Conservation Area (red outline)

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

Accessibility to Services

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



Figure 3 - Location of Key Facilities

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

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

The identified facilities are as follows:

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

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

Table 1 – Schedule of Facilities in Robertsbridge

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

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

Conclusion

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

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

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

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

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

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

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

Appendix B: Hodson’s Mill Landscape Statement, prepared by The Environment Partnership (September 2025)



THE
ENVIRONMENT
PARTNERSHIP



Hodson's Mill, Robertsbridge

Landscape Statement

September 2025
IN10566.001

Project Name	Hodson's Mill, Robertsbridge
Document Ref	IN10566.001
Prepared For	Homes England C/O Campbell Reith
Author	LF
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1.0 Introduction

This Landscape Statement has been prepared by The Environment Partnership (TEP) Ltd on behalf of Homes England. This report considers the landscape and visual baseline to understand the landscape opportunities and constraints affecting the potential development of land at Hodson's Mill, Robertsbridge, in relation to landscape character and visual amenity.

This document does not constitute a full Landscape and Visual Appraisal (LVA), as the development proposals are not yet fixed. Instead, it provides a high-level overview of the existing landscape character and views within the area, alongside an initial consideration of where development might be accommodated and the potential impacts on the High Weald National Landscape based on the Illustrative Masterplan (see Section 7.0). The approach has been informed by the principles outlined in the Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3), published by the Landscape Institute and the Institute of Environmental Management and Assessment (2013).



View west towards the Oast House from within the Site

The Site

The Site extends to approximately 6.2ha and comprises a number of disused industrial buildings together with extensive areas of hardstanding. The remaining buildings comprise offices and storage areas, together with Hodson's Mill and the Grade II Listed Oast House adjacent to it.

The undeveloped areas of the Site comprise grassland, scrub, hedgerow, tree belts and scattered trees. A mill pond is present in association with the former Hodson's Mill.

The former mill area is allocated for development in the Salehurst and Robertsbridge Neighbourhood Plan 2016-2029 (see Section 2.0).

The Site is in the High Weald National Landscape. The site boundaries are shown on Figure 1: Site Location Plan. A more detailed description of the Site is presented later in this document.



View south-west towards Oast House and mill buildings from within the Site

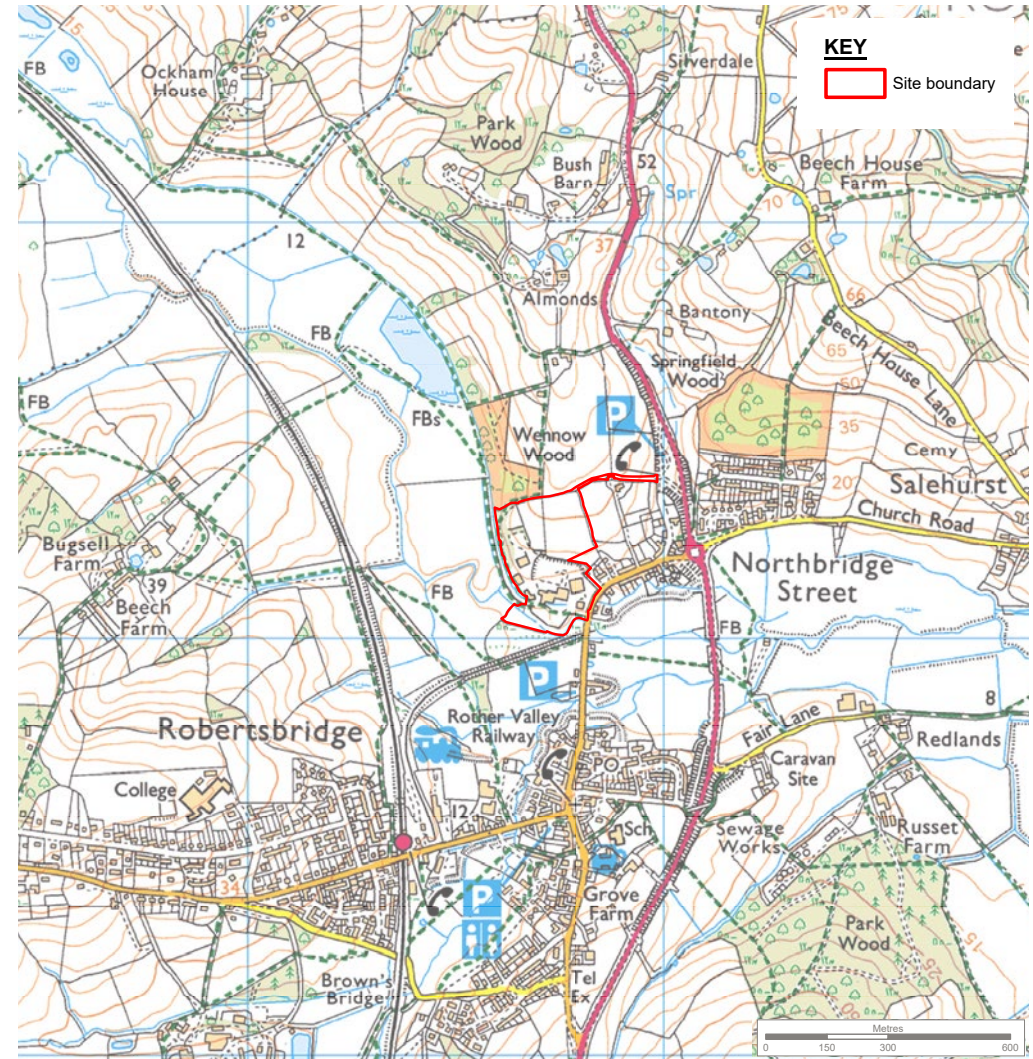


Figure 1: Site Location Plan

2.0 Planning Context

From November 22nd 2023, all Areas of Outstanding Natural Beauty (AONBs) are to be known as National Landscapes. The High Weald National Landscape remains designated an Area of Outstanding Natural Beauty (AONB) and is referred to as such in policy, legislation and guidance. Its statutory purpose remains unchanged.

National Planning Policy Context

The National Planning Policy Framework (NPPF) (December 2024) sets out the Government's planning policies for England, how these are expected to be applied at a local level in development plans and how developers should address them.

Section 12: 'Achieving well-designed places' recognises the importance of good design as *'the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve'*.

Section 15: 'Conserving and Enhancing the Natural Environment' states that the planning system should *'contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes (in a manner commensurate with their statutory status or identified quality in the development plan)'*.

Paragraph 188 explains that plans should *'distinguish between the hierarchy of international, national, and locally designated sites and allocate land with the least environmental or amenity value, where consistent with other policies in the Framework'*.

Paragraph 189 states *'great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation landscape and scenic beauty'*.

Local Planning Policy Context

The Site is in the administrative area of Rother District Council. The Development Plan for the area consists of the Local Plan Core Strategy (adopted September 2014) and the Development and Site Allocations Local Plan (adopted December 2019).

Local Plan Core Strategy

The Local Plan Core Strategy outlines the Council's vision and objectives for guiding the future pattern and form of development until 2028. This vision includes maintaining the high quality of the natural and built environment and enhancing long-term stewardship, with careful consideration of potential future impacts of climate change.

The following policies are of relevance to the Site in relation to landscape:

Policy EN1 Landscape Stewardship

Policy EN1 states that the management of the historic, built, and natural environment will be accomplished by protecting and enhancing nationally designated and locally distinctive landscapes and features. This includes the High Weald National Landscape, nationally designated historic sites, open landscapes between well-defined settlements, ancient woodlands, tranquil and remote areas with dark night skies, and other key landscape features across the district

such as native hedgerows, field patterns, and watercourses.

Policy EN3 Design Quality

Policy EN3 emphasises the importance of high-quality design and outlines key design principles applicable to developments of all scales. The landscape setting of buildings and settlements is a key principle for consideration.

Development and Site Allocations Local Plan

The Development and Site Allocations Local Plan covers the same time period as the Core Strategy and effectively serves as "part two" of the Council's Local Plan. Policies of relevance to landscape are outlined below.

Policy DEN1: Maintaining Landscape Character

Policy DEN1 emphasises that the siting, layout,

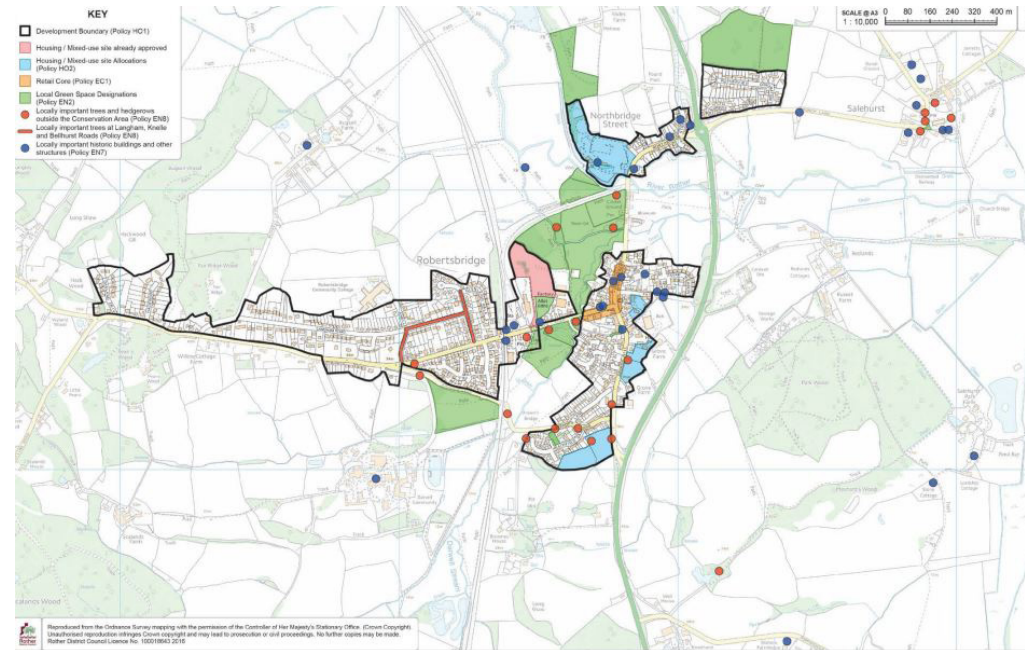


Figure 2: Extract from Robertsbridge Neighbourhood Plan

2.0 Planning Context

and design of development should maintain and reinforce the landscape character of the area, reflecting local landscape features. In remote areas, tranquillity should be maintained, including the preservation of dark skies.

Policy DEN2: The High Weald Area of Outstanding Natural Beauty (AONB)

Policy DEN2 states that the landscape and scenic beauty of the High Weald AONB should be conserved and enhanced where development occurs within its boundaries or settings, considering the impact on its character components as outlined in the High Weald AONB Management Plan.

Salehurst and Robertsbridge Neighbourhood Plan

The Salehurst and Robertsbridge Neighbourhood Plan ('made' in July 2018) covers the period 2016-2028 and aims to preserve and improve the parish, while endorsing sustainable development that respects their location within a National Landscape (AONB). Policies of relevance to landscape include:

Policy EN3: Countryside Protection and the Parish's place within the High Weald Area of Outstanding Natural Beauty

Policy EN3 states that 'development will only be permitted where it conserves or enhances the natural beauty of the Parish and has regard to the High Weald AONB Management Plan'.

Policy EN4: Conservation of Landscape and Natural Resources

Policy EN4 stipulates that development must preserve established landscape features such as mature trees, diverse hedgerows, watercourses, and ecological networks, along with their adjacent habitats and ponds. In cases where trees and shrubs are lost as a result of development, compensatory planting must be undertaken elsewhere on the site.

Policy EN8: Locally important trees and hedgerows outside the Conservation Area

Policy EN8 notes that development proposals should aim to preserve trees or hedgerows of significant arboricultural and/or amenity value whenever feasible.

Policy EN8 states 'planning permission will not be granted where development would result in an unacceptable loss, or damage to, existing trees or woodlands or hedgerows during or as a result of development unless the benefits of the proposed development outweigh the amenity value of the trees or hedgerows in question'.

Policy HO2: Site Allocations

The Neighbourhood Plan designates the Mill Site along Northbridge Street for a mixed-use development, encompassing residential development as well as the conversion of the Mill building and listed buildings. The Site includes this allocated area.

Policy HO5: Design

Policy HO5 states that new development must be of high quality and inclusive design that is sympathetic to local character and qualities of the High Weald AONB.

Emerging Planning Policy

A new District Local Plan for the period 2020-2040 is being prepared and a Draft Version (Regulation 18) was published in April 2024. Draft policies of relevance to landscape include:

Proposed Policy GTC9: High Weald National Landscape (AONB)

Proposed Policy GTC9 states that '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'.

The Proposed Policy further states '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 190 of the NPPF'.

Proposed Policy LAN1: Rural Environments and Landscape Character

Proposed Policy LAN1 notes that distinctive local landscape characteristics should inform the siting, layout, and design of developments to preserve the natural and built character of the area. Priority should be placed on landscapes and features,

including the High Weald National Landscape, open landscape between clearly defined settlements, visual character of settlements, settlement edges, tranquil and remote areas and other landscape feature such as hedgerows, copses, field patterns and historic field boundaries.

Proposed Policy LAN2: Trees, Woodlands, and Hedgerows

Proposed Policy LAN2 expresses that 'development must, where appropriate, enhance and expand the district's tree, hedgerow and woodland resource'.

Proposed Policy LAN2 also states that '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.'

The Proposed Policy highlights the criteria that must be met, including 'where the loss of trees and/or hedgerows is considered acceptable, adequate replacement provision must utilise local and native species that are in sympathy with the character of the existing tree or hedge species in the locality and the site'.

Proposed Policy LAN3: Dark Skies

Proposed Policy LAN3 outlines that development should uphold and strengthen tranquillity in remote areas, notably those within the High Weald National Landscape, by preserving dark skies and avoiding unnecessary light pollution. Projects that require significant lighting should be situated away from naturally dark rural skies and wildlife-sensitive zones.

2.0 Planning Context

Other Relevant Guidance

High Weald AONB Management Plan 2024-2029

The High Weald AONB Management Plan 2024-2029 details the key purpose of a National Landscape, which is to conserve and enhance the special attributes that represent its natural beauty. It provides guidelines for landscape management by defining natural beauty in terms of its essential characteristics, also relevant to its setting.

The special attributes of significance within the High Weald National Landscape are set out in Section 3.0.

Previous Planning Permission

Rother District Council previously granted planning consent (Application Ref: RR/2017/382/P) for the erection of 96 no. residential dwellings (Use Class C3), non-residential floorspace comprising 280 sqm (Use Class A3) and 920 sqm (Use Class B1), and associated access, car/cycle parking, open amenity space, strategic landscaping and green infrastructure and including restoration works to the Mill Building and Oast House. The previous planning application was on the mill site only and excluded the two fields to the north.

3.0 Landscape and Visual Baseline

Designations

Relevant environmental designations are shown on Figure 3 and are described further below.

High Weald National Landscape

The Site is in the High Weald National Landscape which is characterised by its hilly, rugged, and remote terrain of ridges and valleys, covered by a patchwork of fields, woods, and shaws.

National Landscapes are recognised as being exceptional landscapes of distinctive character and natural beauty. They are of national importance and receive special protection from the Government. A National Landscape would be anticipated to be a 'valued landscape' referenced in the National Planning Policy Framework paragraph 187 a).

Scheduled Monuments

Robertsbridge Abbey is the only Scheduled Monument in the study area, located on flat ground approximately 1.5km east of Robertsbridge. It includes the Cistercian Abbey and monastic precinct of St Mary, with remnants such as a moat and fishponds. There is no intervisibility between the Site and the Scheduled Monument beyond intervening vegetation.

Listed Buildings

There is an eighteenth-century timber-framed building forming the Western Part of the Former Oasthouse to Mill Farm, located near the western boundary. This two-storey structure features large attic windows and retains original elements such as reused posts, braces, and old floorboards.

However, the building is now in a significantly deteriorated condition, with visible structural decay, missing cowls, and signs of prolonged neglect. The extent of dilapidation may have implications for its restoration potential and heritage value

Locally Listed Buildings

The Mill Building is a prominent site feature, but is in poor condition following a significant period of disuse. The building is locally listed, meaning that, while this is not statutorily listed, it has been identified by the Council as a recognised historic building.

Robertsbridge and Northbridge Street Conservation Area

The Robertsbridge and Northbridge Street Conservation Area stretches westward into the Site, encompassing the now disused Hodson's Mill and the land to its south. This section of the Conservation Area serves as a prominent visual representation of the village's industrial past. To the east of the Mill, the vicinity around Northbridge Street exhibits predominantly linear development with medieval origins, as stated in the Robertsbridge and Northbridge Street Conservation Area Appraisal.

Ancient Woodland

Ancient woodland is a key aspect of the landscape and forms an essential part of Rother's historical heritage. There are over 8,000 ha of ancient woodland in the district and the closest Ancient Woodlands are Park Wood and Townfield Shaw.



Figure 3: Environmental Designations

3.0 Landscape and Visual Baseline

Published Landscape Character Assessments

The use of published landscape character assessments is a widely accepted tool, used to inform an understanding of the landscape context for potential development sites. Landscape character is described at both national and local levels.

National Landscape Character 122: High Weald

At a national level, the Site is within National Character Area (NCA) 122: High Weald. The NCA encompasses the ridged and faulted sandstone core of the Kent and Sussex Weald. The High Weald consists of a mixture of fields, small woodlands and farmsteads connected by historic routeways, tracks and paths. The High Weald Area of Outstanding Natural Beauty (AONB) encompasses 78 percent of this area.

Statements of Environmental Opportunity (SEO) of relevance to the Site include:

SEO 1: Maintain and enhance the existing woodland and pasture components of the landscape, including the historic field pattern bounded by shaws, hedgerows and farm woods, to improve ecological function at a landscape scale for the benefit of biodiversity, soils and water, sense of place and climate regulation...;

SEO 3: Maintain and enhance the distinctive dispersed settlement pattern, parkland and historic pattern and features of the routeways of the High Weald, encouraging the use of locally characteristic materials and Wealden practices to ensure that

any development recognises and retains the distinctiveness, biodiversity, geodiversity and heritage assets present, reaffirm sense of place and enhance the ecological function of routeways to improve the connectivity of habitats and provide wildlife corridors; and

SEO 4: Manage and enhance recreational opportunities, public understanding and enjoyment, as well as conserve and enhance the natural and historic environment, in accordance with the purpose of the High Weald AONB designation.

As NCAs cover extensive areas they are of limited relevance to the scale of the Site.

East Sussex Landscape Character Assessment

The East Sussex Landscape Character Assessment was published in 2016 and provides an overview of the East Sussex Landscape, including areas within the High Weald National Landscape.

The landscape of East Sussex is divided into County Landscape Character Areas (LCAs) which share broadly similar combinations of geology, topography, drainage patterns, vegetation, historical land use, and settlement pattern.

The Site is in the Upper Rother Valley LCA, as shown on Figure 4: Landscape Character.

This LCA is a 'largely unspoilt and tranquil rural landscape with few intrusive features, and well managed as farmland'. The lack of main roads and large settlements maintains a relative remoteness although the character assessment reported that there is evidence of creeping

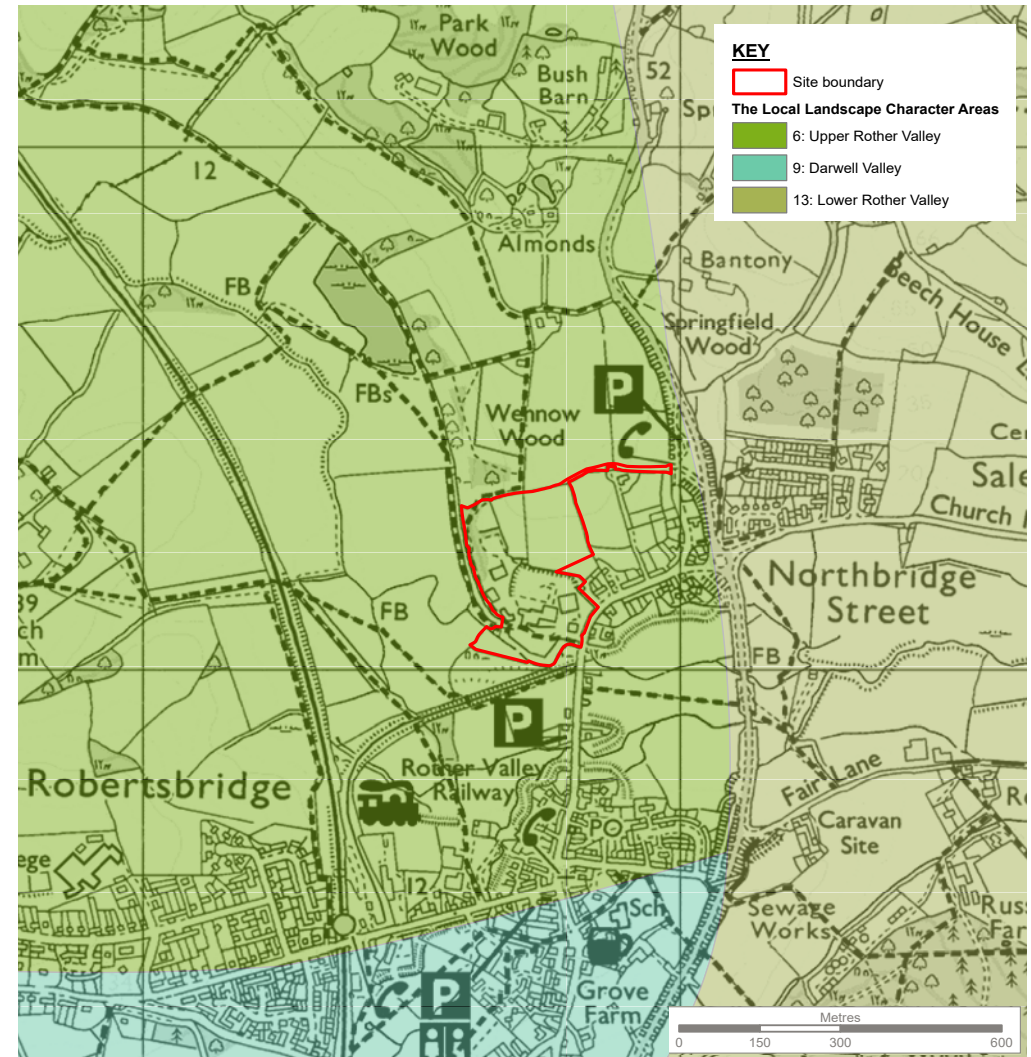


Figure 4: Landscape Character

3.0 Landscape and Visual Baseline

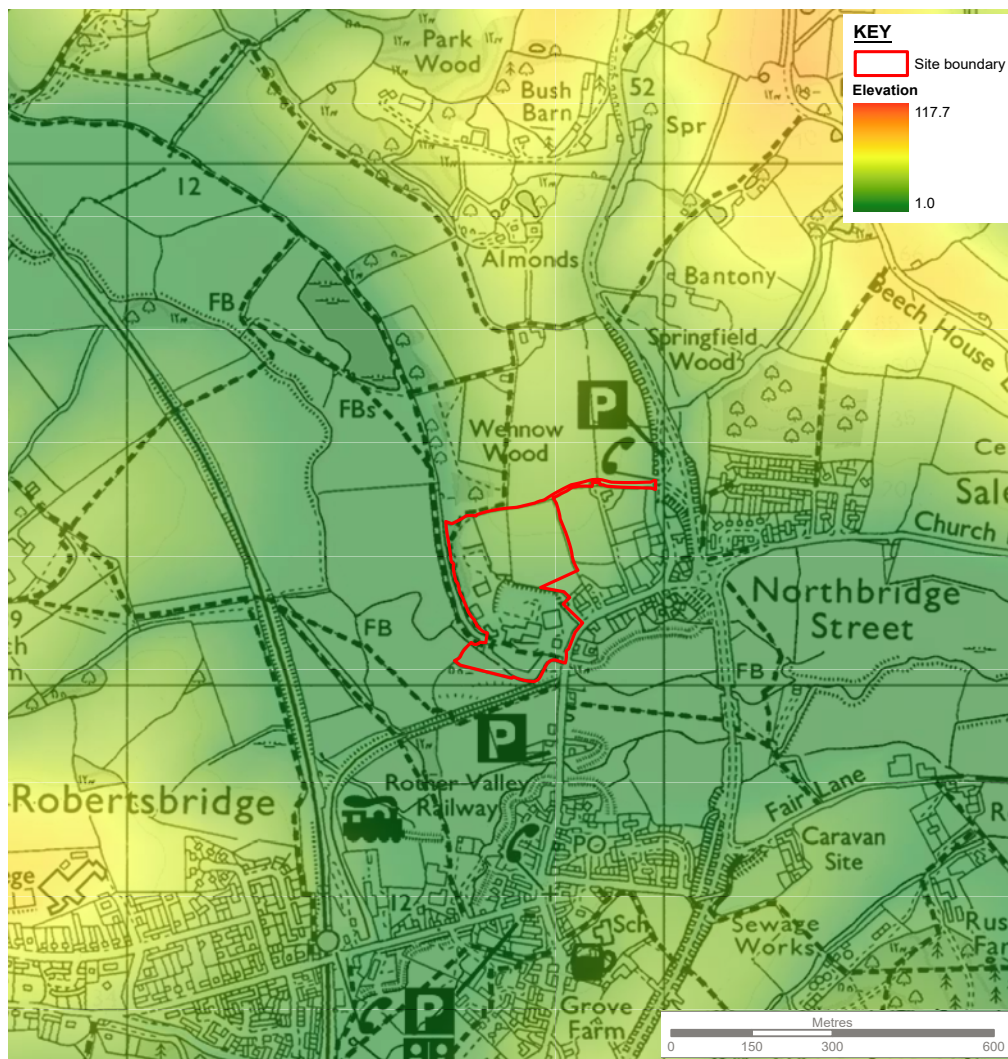


Figure 5: Topography

suburbanisation around the villages and on country estates detracting from local distinctiveness. The Landscape Character Assessment highlights 'Mayfield, Robertsbridge and Wadhurst are nucleated villages which have grown around a historic core'. 'As with most of the Wealden landscape, the historic field patterns of small fields and significant hedgerows remain intact, apart from in the wider more fertile river valleys where farming is more intensive'.

Key features include:

- 'The broad valley of the River Rother dominates the landscape and is overlooked by bold ridges and spurs;
- A strong pattern of linear ghyll woods as well as many larger woods on the valley slopes.
- Stunning views across the valley from the enclosing ridges, some of the finest views in the High Weald;
- The upper half of the largest valley system in the High Weald and the catchment and source of the western river Rother;
- Relatively open valley floor with small, winding, partly tree-lined river;
- Extensive areas of remote countryside and exceptional remoteness especially in the valleys and larger woods;
- The villages have great character and variety often with landmark churches and other historic buildings;

Landscape guidelines for the Upper Rother Valley

LCA include for example:

- Protection and management of existing wetland habitats and planning for restoration of ditches, riverside vegetation and tree cover;
- Protection and enhancement of the remote qualities of the river valleys;
- Integrate proposed and existing development into the landscape through planting of tree features and woodland;
- Ensure that the design and layout of new developments respect the character and form of the landscape and settlements;
- Conserve the setting of historic buildings and landscape features;
- Protect and enhance historic designed landscapes and features of archaeological significance;
- Consider appropriate species for new planting to maintain landscape character and biodiversity;
- Restore and strengthen tree and woodland structure.

A site visit confirmed that the Site and surrounding landscape share some of the key features of this LCA, particularly views across the valley, the tree-lined river and characterful villages.

Development pressure in larger villages is identified as a force for change, but the assessment also recognises the need to provide local housing in the villages and larger service centres. One of the Landscape Management

3.0 Landscape and Visual Baseline

Guidelines for the LCA is to 'Protect and Enhance the character of the villages'. This includes guidelines to:

- 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.

The Site is well-positioned to make a meaningful contribution to meeting identified housing needs in a manner that is sensitive to, and respects, the existing landscape character.

Rother District Council Market Towns and Villages Landscape Assessment

The Market Towns and Villages Landscape Assessment describes the character and capacity to accommodate development in the market towns and villages in Rother District.

The study uses a four point scale to determine capacity, including high, moderate, low or no capacity. This represents the capacity of a particular area to absorb the proposed type of development without significant adverse effects.

The Site is evaluated as part of Parcel R6 - Northbridge Street which encompasses enclosed pastures and meadows on the edge Northbridge Street.

The parcel is reported to be of a high value due to its location within the National Landscape and to be in good condition. The landscape character and visual sensitivity to change is reported to be moderate.

Overall this parcel is reported to have a moderate capacity to accommodate new residential development which would only be considered acceptable near the village edges. The capacity for development takes into account the presence of landscape designations.

The assessment notes that there is moderate potential for mitigation, and that there would be some scope to strengthen the edge of the village in views to the High Weald beyond.

The overall summary for Robertsbridge notes that Hodson's Mill is one of the areas with greatest capacity. Six parcels were evaluated in Robertsbridge and only Hodson's Mill and Grove Farm are reported to have moderate landscape capacity, with one parcel, Browns Bridge, reported to have low capacity and the remaining three parcels reported to have no capacity to accommodate development.

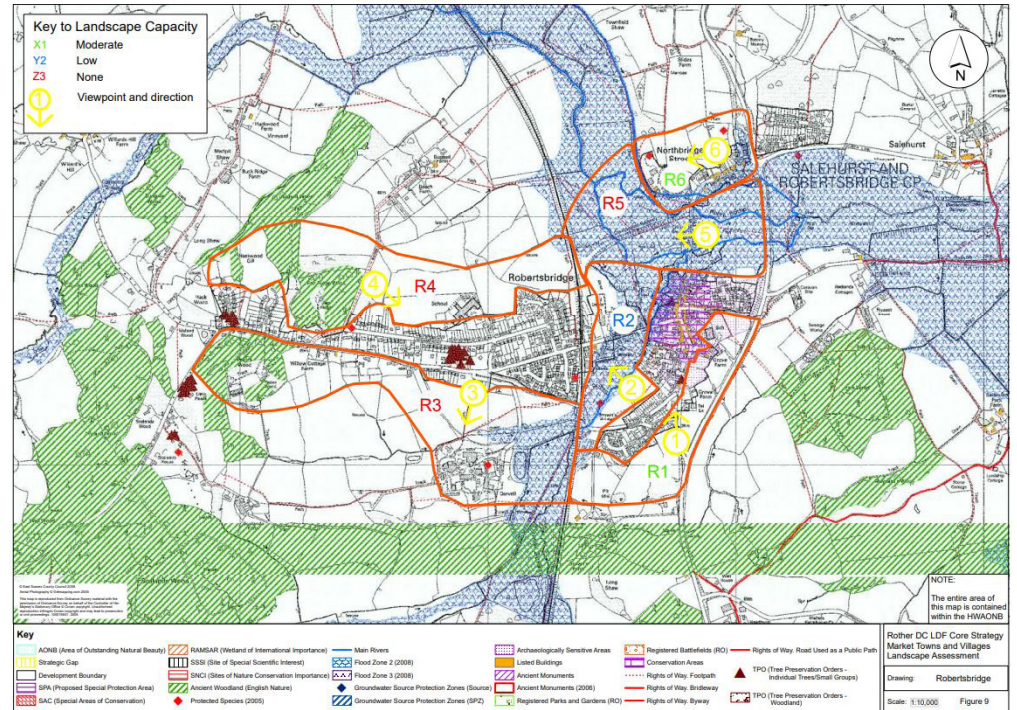


Figure 6: Landscape Capacity from the Rother District Council Market Towns and Villages Landscape Assessment

3.0 Landscape and Visual Baseline



Figure 7: Site Context

Landscape Character of the Site

Land Use

The Site occupies approximately 6.2 hectares (ha). This includes the floodplain of the River Rother in the southern part of the Site, the Mill Race channelled section of the River Rother, the four-storey Victorian mill building (Hodson's Mill), a mill pond adjacent to the south east of the mill building, a Grade II listed Oast House, a storage barn and areas of hardstanding.

Beyond the former mill area are two field parcels comprising grassland and bound by hedgerows and woodland (referred to in this report as 'Parcels C and D').

Access

Vehicular access to the Site is via High Street to the east.

A Public Right of Way (PRoW) [Footpath SAL/8/1] crosses the centre of the Site on an east-west alignment connecting Mill Race to Northbridge Street. The footpath extends beyond the western site boundary.

Beyond the northern site boundary a permissive footpath extends from PRoW [Footpath SAL/8/1] to the lay-by on the A21.

Boundaries

The Site is bound to the north by woodland, to the east by Northbridge Street, to the south by River

Rother and woodland to the north of the Kent & Sussex Railway and to the west by Mill Race.

Topography

Generally, the Site slopes from north to south from a high point of approximately 28.5m AOD on the Site's northern boundary to 10m AOD in the south of the Site just south of the River Rother (see Figure 5: Topography).

The central and north-western areas of the Site have been re-profiled containing a series of terraces cut out from the slope. Each terrace is bounded to the north by steep embankments. The main plateau surrounds the existing mill building and sits low in relation to surrounding topography.

To the south of Robertsbridge land rises steeply to a high point of 74m AOD near Maynard's Wood.



South-facing valley slopes of the River Rother Valley

3.0 Landscape and Visual Baseline

Settlement

Robertsbridge and Northbridge Street are distinct linear settlements to the south and east of the Site respectively. Both developed around the River Rother during the 14th Century with the riverine landscape providing a scenic backdrop. The positioning of the settlements along the valley sides and floor creates a sense of enclosure and a predominantly 'introverted' character, with much of the settlements' edge concealed from distant views.

As identified in the Robertsbridge and Northbridge Street Conservation Area Appraisal, these settlements feature diverse streetscapes with a mix of leisure, commercial, and residential properties, resulting in varied character areas within the settlements themselves.

Robertsbridge predominantly consists of medieval 'Wealden' Hall Houses that are timber-framed and generally uniform in character. In the northern section of High Street, these buildings are densely

packed, creating an urban streetscape with heavy traffic. Conversely, the southern end of High Street has a wider building line, resulting in a more suburban and residential character. This coherent development pattern is lost along Station Road to the west, which lacks the density and volume of historic buildings found in the rest of the village centre.

North of Robertsbridge, Character Area 5 - Northbridge Street features a cluster of historic buildings that showcases its varied vernacular materials and architectural styles. The character is much less urban than the main village of Robertsbridge. To the east of the A21 Northbridge Street is characterised by mid to late 20th Century residential development with some infill development along Rotherview and Coronation Cottages disrupting the linear settlement pattern, as stated in the Conservation Area Appraisal.

Existing development in Robertsbridge generally does not extend beyond the 35m contour line with development in Northbridge Street generally not extending beyond the 30m contour line. The northern site boundary is at approximately 28.5m AOD.



Robertsbridge High Street

3.0 Landscape and Visual Baseline

Landscape Value

High Weald National Landscape

The Site is in the High Weald National Landscape. National Landscapes are recognised as being exceptional landscapes of distinctive character and natural beauty. They are of national importance and receive special protection from the Government. A National Landscape (AONB) would be anticipated to be a 'valued landscape' referenced in the National Planning Policy Framework paragraph 187 a).

Policy DEN2 of the Development and Site Allocations Local Plan makes it clear that all development within or affecting the setting of the High Weald National Landscape should conserve and seek to enhance its landscape and scenic beauty, having particular regard to the impacts on its character components, as set out in the High Weald AONB Management Plan.

The High Weald AONB Management Plan 2024 - 2029 sets out the special attributes of significance within the High Weald National Landscape. These include:

- **Natural systems (geology, soils, water and climate)** - a deeply incised, ridged and faulted landform of clays and sandstone with highly variable, relatively undisturbed soils and numerous headwaters (gill streams) functioning under an oceanic climate. This special quality is present within the Site.
- **Settlement** - dispersed historic settlement including high densities of isolated farmsteads, hamlets and late medieval

villages founded on trade and non-agricultural rural industries. This special quality is present within the immediate context of the Site.

- **Routeways** - a dense network of historic routeways (now roads, tracks and paths). This special quality is present within the Site.
- **Woodland** - an abundance of ancient woodland mostly in small holdings, highly interconnected with hedges and shaws. This special quality is not present within the Site.
- **Fieldsapes and heath** - small, irregular and productive fields, bounded by hedgerows and woods, and typically used for livestock grazing; with distinctive zones of lowland heaths and inned river valleys (reclaimed marshland). This special quality is not present within the fields within the Site.
- **Dark night skies** - intrinsically dark at night with our own galaxy (the milky way) visible. This special quality is present within the Site.
- **Aesthetic and perceptual qualities** - arising from the interaction of people with the landscape, including the notion of a quintessential English pastoral landscape, intimacy of scale, a sense of history and timelessness; rurality and tranquillity; glimpsed long views; freedom to explore and make connections with the natural world, and a rich legacy of features and ideas left by writers, poets and gardeners inspired by the landscape. This special quality is not present within the Site.
- **Land-based economy and rural living** - with roots extending deep into history, and

which has visibly and culturally shaped the landscape. This special quality is present in previously developed parts of the Site.

Further consideration of how the Site contributes to the special qualities of the National Landscape is provided in Section 8.0.

Robertsbridge and Northbridge Street Conservation Area

Whilst not specific landscape designations, Conservation Areas reflect landscape and architectural quality and are relevant to development proposals which may impact upon them. Part of the Site is in the Robertsbridge and Northbridge Street Conservation Area.

3.0 Landscape and Visual Baseline

Visual Baseline

Views from within the Site

The Site is on the northern sides of a relatively steep and narrow valley surrounding the River Rother and its tributaries. The valley is rural and relatively small-scale with fields bound by blocks of deciduous woodland and tall hedgerows. From areas of higher ground within Site there are views across the valley to the south towards Robertsbridge with views towards isolated dwellings and woodland to the east and west.

Views towards the Site

Views towards the Site are typically foreshortened by woodland and topography. Many of the roads and footpaths are set low within the surrounding hedgerows and hedgebanks.

Following the preliminary assessment of the landscape context it was considered that there would be potential views from:

- The local PRoW network, principally Public Footpath SAL/8/1 and the permissive path to the north of the Site;
- Robertsbridge Cricket Club and The Clappers Recreation Ground;
- The local road network, including High Street and the A21;
- The local community within Northbridge Street; and
- Local community at Robertsbridge.

The Robertsbridge and Northbridge Street Conservation Area Appraisal identifies two views looking towards the Site. At the time of survey the view looking north over the railway was heavily screened by intervening vegetation. The other is Viewpoint 1 below.

Six publicly accessible viewpoints were selected and visited as part of the field study to demonstrate the range of potential views into the Site (see Figure 7: Viewpoint Location Plan). The selected viewpoints were agreed with Rother District Council in February 2025 and are listed below.

- Viewpoint 1: View west towards the Site from High Street;
- Viewpoint 2: View north towards the Site from Robertsbridge Cricket Club;
- Viewpoint 3: View south across the Site from permissive path to the north;
- Viewpoint 4: View north-west towards the Site from PRoW [Footpath SAL/30/3] below the A21;
- Viewpoint 5: View north-east towards the Site from PRoW [Footpath SAL/23/2] ; and
- Viewpoint 6: View north-east towards the Site from PRoW [Footpath SAL/21/1].

Viewpoint photography is provided for illustrative purposes and has been annotated to indicate the visible extents of the Site. Photography was recorded in June 2024 and represents 'best-case scenario' visibility when vegetation is in full leaf. Further site surveys were undertaken in February 2025 and September 2025.

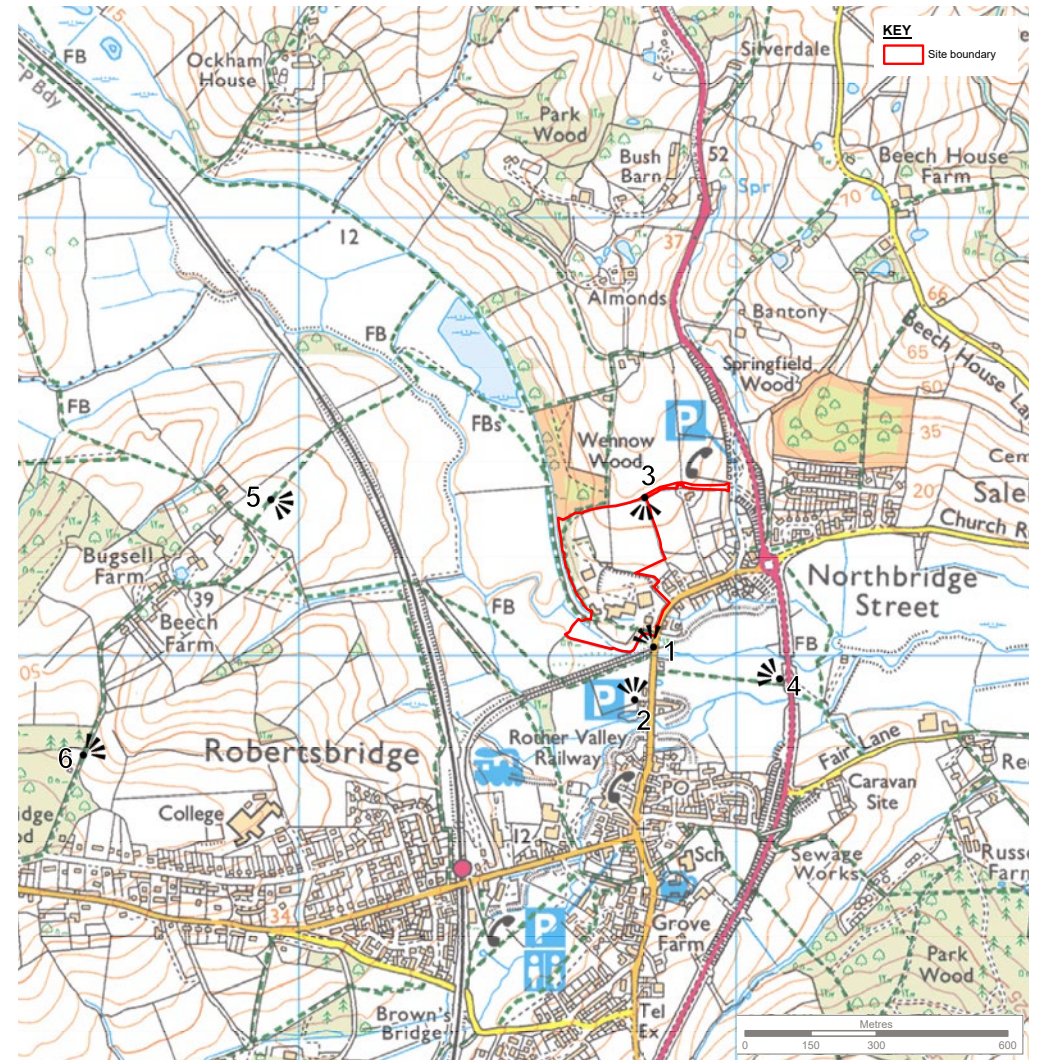


Figure 8: Viewpoint Location Plan

3.0 Landscape and Visual Baseline

Viewpoint 1: In this view looking west from High Street the majority of the Site is screened from view by existing vegetation along the River Rother. There are some glimpsed views towards Hodson's Mill, which is likely to be more visible in winter when deciduous vegetation is not in leaf. Parcels C and D are not visible from this location.

This view is identified as a significant view in the Robertsbridge and Northbridge Street Conservation Area Appraisal. There would be views towards new built form near Hodson's Mill from this point. Views will be filtered by existing vegetation in summer.



Viewpoint 1: View west towards the Site from High Street (June 2024)

Viewpoint 2: Looking north from Robertsbridge Cricket Club there are clear views towards Hodson's Mill through gaps in existing vegetation along the River Rother. The majority of the Site is screened from view by existing vegetation, but views are likely to be slightly more open in winter when deciduous vegetation is not in leaf. There would be glimpsed views towards new built form from this point which will be filtered by existing vegetation.



Viewpoint 2: View north towards the Site from Robertsbridge Cricket Club (June 2024)

3.0 Landscape and Visual Baseline

Viewpoint 2: In this panoramic view from a gateway along the permissive path to the north of the Site there are clear views across Parcel D with some glimpsed views towards Parcel C beyond the intervening hedgerow and Hodson's Mill. The Oast House is not visible from this point beyond intervening vegetation.

Beyond the Site there are views towards rooftops of residential properties in Northbridge Street and Robertsbridge and towards the north-facing valley slopes with areas of woodland on high ground.

There would be views towards new built form in Parcels C and D from this point. Key sight lines towards the Mill Building from within the Site will be retained.



Viewpoint 3: View south across the Site from permissive path to the north (June 2024)

Viewpoint 3: In this view looking north-west from PRoW [Footpath SAL/30/3], below the A21, the majority of the Site is screened from view by existing vegetation. There are some glimpsed views towards Hodson's Mill, which is likely to be more visible in winter when deciduous vegetation is not in leaf. There are some glimpsed views towards Parcels C and D. There would be glimpsed views towards new built form from this point, which will be filtered by existing vegetation and built form.



Viewpoint 4: View north-west towards the Site from PRoW [Footpath SAL/30/3] below the A21 (June 2024)

3.0 Landscape and Visual Baseline

Viewpoint 5: In this panoramic view from PRow [Footpath SAL/23/2] near Bugsell Farm the Site is barely discernible amongst existing vegetation. There are some glimpsed views towards rooftops within Robertsbridge and clear views towards the north facing valley slopes and areas of woodland on higher ground beyond. There would be glimpsed views towards new built from around Hodson's Mill, which will be filtered by existing vegetation.



Viewpoint 5: View north-east towards the Site from PRow [Footpath SAL/23/2] (June 2024)

Viewpoint 6: In this view from PRow [Footpath SAL/21/1] there is a glimpsed, distant view towards the northern part of the Site, including the northern boundary of the Parcels C and D. Hodson's Mill and the Oast House are screened from view by intervening vegetation. The Site forms a very minor part of this view and is only visible from a short stretch of the PRow. There would be distant views towards new built form in a small part of Parcels C and D from this point.



Viewpoint 6: View north-east towards the Site from PRow [Footpath SAL/21/1] (June 2024)

4.0 Constraints and Opportunities

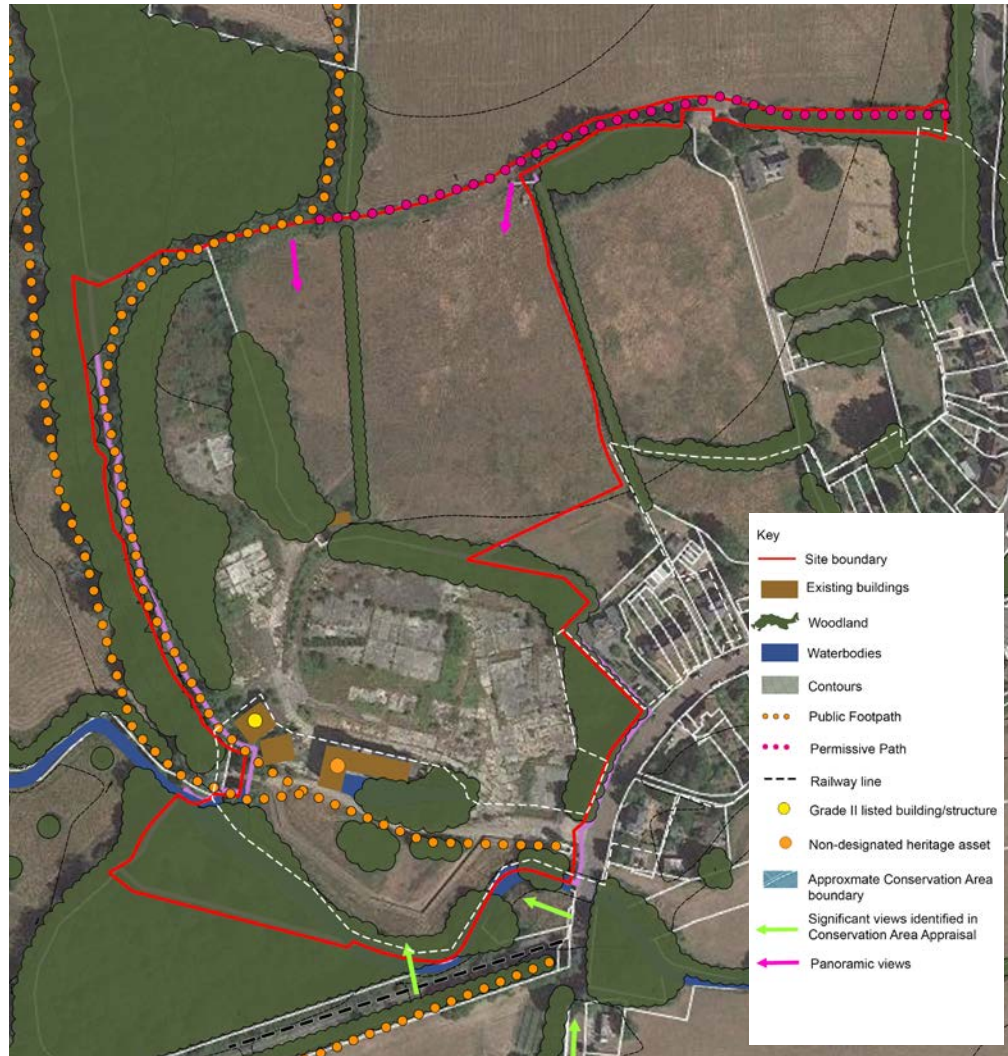


Figure 9: Landscape Constraints and Opportunities Plan

The study and review of the recommendations within the East Sussex Landscape Character Assessment has led to the identification of the following key constraints and opportunities (see Figure 8: Landscape Constraints and Opportunities). These provide a framework to help guide a responsive, landscape-led masterplan:

Key Opportunities

- Respond sensitively to the landform, making the most of the natural screening provided by the valley landform and existing vegetation to integrate development into the wider landscape.
- Retain and enhance existing PRow which provide good connectivity through the Site and link into the wider countryside. PRow's adjacent to the Site have potential to be improved with surfacing and signage.
- Maintain outward views across the wider landscape from the northern part of the Site, helping retain a connection to the surrounding landscape.
- Reflect the existing pattern and character of residential development in Northbridge Street to ensure new development complements the local context.
- Preserve and strengthen existing valued landscape features, including trees, hedgerows, and other green infrastructure, to create a mature landscape framework that supports Biodiversity Net Gain. Vegetated boundaries will assist in landscape and visual integration and avoid the introduction of abrupt urban fringe characteristics.

- Make use of key vegetated boundaries to provide effective visual containment and soften the transition between development and surrounding countryside, avoiding any harsh urban edges.
- Respect and respond to the Site's heritage assets through sensitive layout and design that reinforces and sustains local character in the long-term, ensuring quality place-making.

Landscape Constraints

The following constraints are applicable to the Site:

- The Site is within the High Weald National Landscape with part of the Site also in Robertsbridge and Northbridge Street Conservation Area, requiring a carefully considered approach that reinforces the area's special qualities.
- The location of Parcels C and D on the more prominent valley slopes dictates that a sympathetic design approach is required to ensure any proposed development does not appear prominent within the wider landscape.
- Visibility from nearby residential properties along Northbridge Street should be taken into account, with opportunities to enhance screening and preserve amenity.
- Existing development in Northbridge Street generally not extending beyond the 30m contour line. The northern site boundary is at approximately 28.5m AOD.
- The undulating landform may require minor contour remodelling, but overall provides a strong framework to guide development that follows the natural grain of the landscape.

5.0 Landscape Evaluation

Parcels

The baseline information, topography and opportunities and constraints have been considered and the Site has been split into four distinct parcels (see Figure 9: Parcels) to enable a more detailed analysis of constraints and opportunities and potential landscape and visual effects if the parcel were to be developed.

- Parcel A
- Parcel B
- Parcel C
- Parcel D

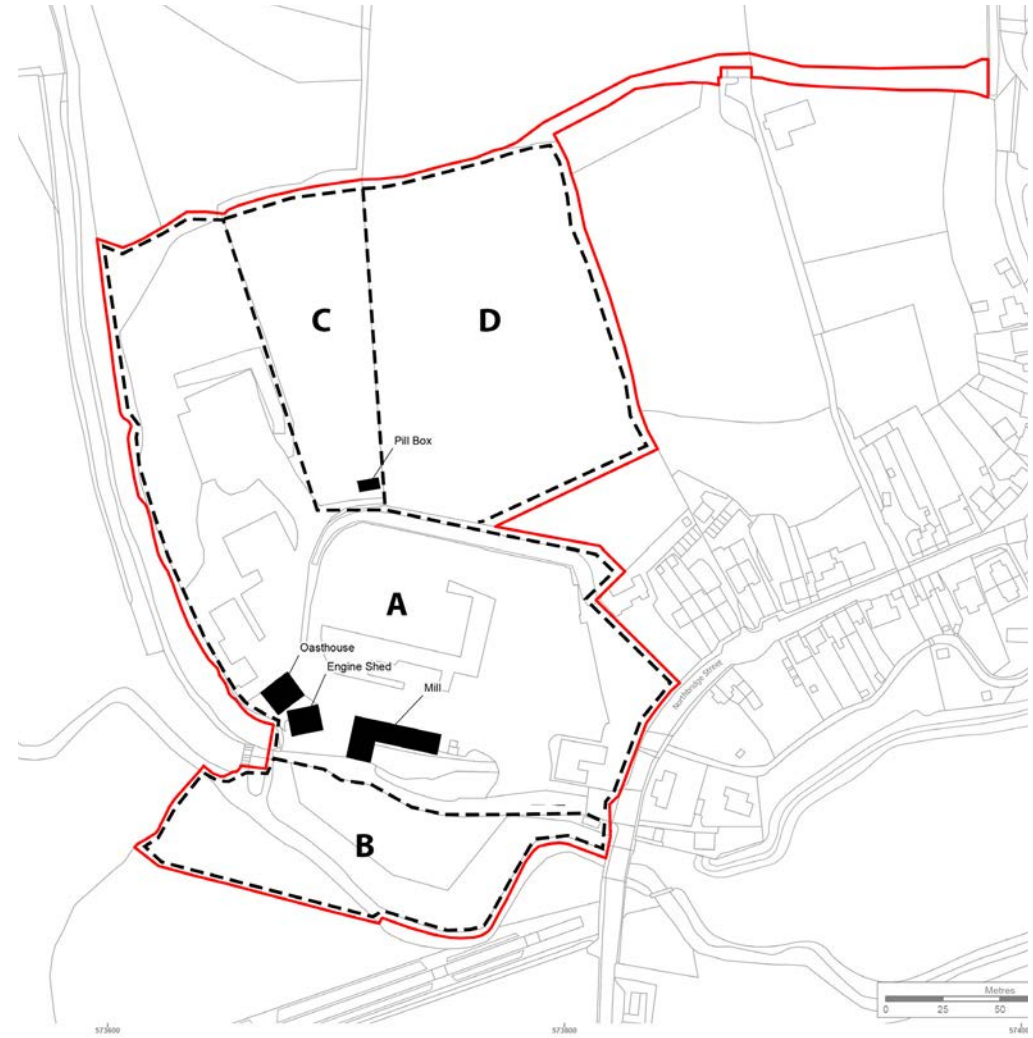


Figure 10: Parcels

Parcel A - Hodson's Mill

This parcel comprises large areas of hardstanding and existing buildings associated with the Site's former use as an animal feed mill. The parcel extends to approximately 3.0ha.

The historic buildings contribute to the land-based economy and rural living special quality of the National Landscape.

Hodson's Mill

Although not Listed, Hodson's Mill is recognised as a non-designated heritage asset and sits within the Robertsbridge and Northbridge Conservation Area. It holds strong associations with the Site's historic milling legacy and contributes to its unique sense of place.

The mill comprises two joined ranges forming an L-plan.

The mill was water-powered and is on the north side of a mill pond with the mill race culvert passing below the west range.

Surrounding the mill are large areas of hardstanding.

Oast House

Positioned nearby, the Oast House consists of two adjoined parallel ranges, the western range being timber-framed and dating to the late 18th century and the eastern range being brick built. The western part of the building is Grade II listed.

The building is currently in a state of very poor repair with partial collapse of the western range roof and dense overgrown vegetation around the western side of the building.

Engine Shed

Adjacent to the Oast House on its south side, this is a mid to late 20th century portal-framed structure of brick and concrete with corrugated roof. It is at the terminus of the former railway siding which entered the Site from the east, passing alongside the mill at its north. The building has a single large

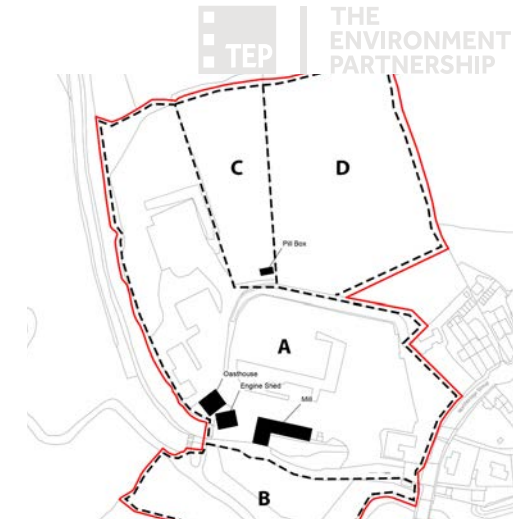
room which can be sealed by sliding metal doors and includes two smaller rooms at the rear.

Potential for Development

This part of the Site is of lowest sensitivity in landscape terms due to the presence of existing buildings and large areas of hardstanding and containment by existing vegetation.

Importantly, this area benefits from a Neighbourhood Plan designation for residential led regeneration and planning permission was previously granted for the redevelopment of this area, offering a clear and immediate pathway for transformation. Historic mapping indicates that the mill complex was once more extensively developed, with structures reaching up to the 20m contour, reinforcing the appropriateness of redevelopment in this location.

Thoughtfully designed new development in this area can respond to the Site's historic character while taking advantage of natural screening in



middle to long-distance views. Heritage buildings offer rich opportunities for adaptive reuse, storytelling, and placemaking.



Areas of hardstanding to the east of Hodson's Mill



The Oast House, viewed from the north-west



The Engine Shed, viewed from the south-east



Hodson's Mill from south of the River Rother

Parcel B

This parcel is to the south of Hodson's Mill and comprises areas of grassland and the River Rother flood defences. The parcel extends to approximately 0.9ha and plays an important role in the site's relationship with the river corridor and wider green infrastructure network.

The River Rother and Mill Race contribute to the natural systems special quality of the National Landscape. PRow Footpath SAL/8/1 follows a historic routeway and contributes to the routeways special quality of the National Landscape.

Flood Defences

Part of the Site is in Flood Zones 2 and 3. Flood defences comprising a raised earth embankment with berm and flood wall is present on the land between the River Rother and PRow [Footpath SAL/8/1]. The flood defences were built in 2004 and are owned and maintained by the Environment Agency.

A well-trodden grass footpath is located in the south of the Site around the south side of the flood defences. While not recorded on Ordnance Survey maps, this route is clearly valued by local users and offers potential to be enhanced as part of future green infrastructure improvements.

Land Beyond the River Rother to the South

Land beyond the River Rother to the south is partly within the site boundary. The land contains a pond, dense areas of blackthorn and a mosaic of grassland and riverbank habitats. There are some mature, broad-leaved trees including ash, oak, maple and hazel.

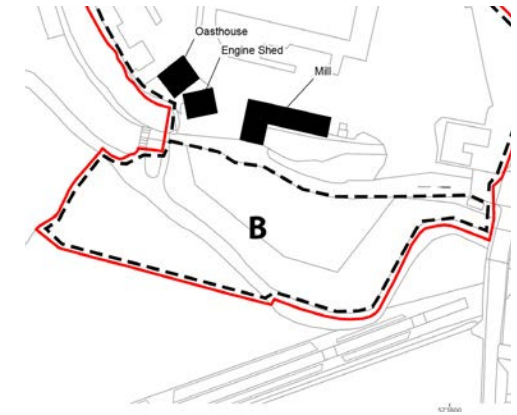
Within the Site there are a number of old fruit trees associated with the former mill owner's garden.

There are a number of informal paths kept open by periodic cutting of the vegetation with links to the existing PRow network.

Potential for Development

Given the location within the Flood Zone and its established ecological and recreational functions, this area has a low landscape capacity to accommodate development. This parcel has limited capacity for built development, but presents significant opportunities to:

- Enhance biodiversity through habitat management and sensitive planting;
- Strengthen green infrastructure connections across the site;
- Support flood resilience and water management; and
- Create or improve recreational and educational assets for the community.



View across grassland to the south of Hodson's Mill with flood defences visible

Parcel C

This parcel is to the north and east of the Hodson's Mill parcel and comprises the western field. The parcel comprises of grassland and ruderal vegetation with a pillbox near the southern boundary and extends to approximately 0.6ha.

The parcel is generally well contained by existing vegetation to the south but becomes slightly more open to the north where there are far-reaching views across the wider landscape. The parcel is contained by Wennow Wood and existing field boundary hedgerows.

A historic field boundary hedgerow separates Parcels C and D.

Pillbox

The pillbox is at the southern edge of the parcel, adjacent to the entrance to Parcels C and D.

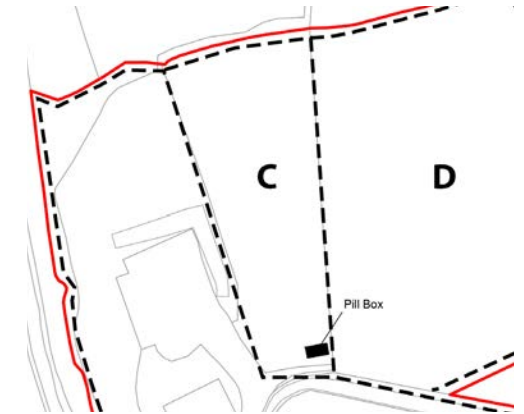
The pillbox is associated with WWII and provided a vantage point over Northbridge Street.

Potential for Development

The parcel comprises greenfield land within the High Weald National Landscape.

Given the enclosure of the Site, this parcel could accommodate development subject to the following:

- The historic hedgerow, which contributes to the special quality of fieldscapes and heath between Parcels C and D to be retained and integrated as a key landscape feature.
- Development to be limited to a maximum of 2 storeys.
- Implementation of a landscape scheme including structural planting to strengthen existing vegetation and provide additional screening.
- Maintaining a northern buffer of public open space/green infrastructure with substantial opportunities for planting.
- Avoiding unnecessary light pollution to maintain dark skies in the High Weald National Landscape.



Pillbox as seen from the south-east



View north across Parcel C from near the Pillbox



View south across Parcel C



View south across Parcel C

Parcel D

This parcel is to the north of the Hodson's Mill parcel and comprises the eastern field. The parcel comprises grassland and ruderal vegetation and extends to approximately 1.6ha.

The parcel is generally well contained by existing vegetation to the south but becomes more open to the north where there are far-reaching views across the wider landscape. The parcel is open to private views from residential properties along Northbridge Street.

A historic field boundary hedgerow separates Parcels C and D.

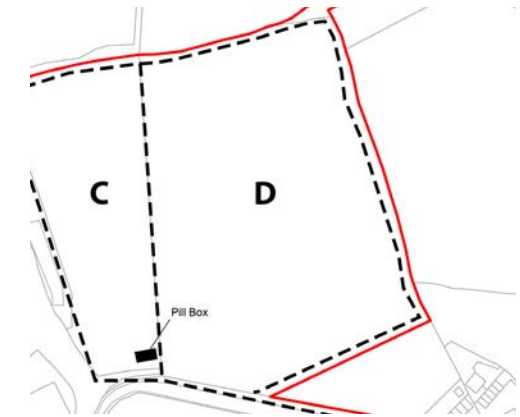
Potential for Development

The parcel comprises greenfield land within the High Weald National Landscape.

Given the enclosure of the Site, this area could accommodate carefully designed development within this parcel, provided that:

- The historic hedgerow, which contributes to the special quality of fieldscapes and heath between Parcels C and D to be retained and integrated as a key landscape feature.
- Building heights are limited to a maximum of two storeys, maintaining a scale that complements the surrounding landscape.
- Implementation of a landscape scheme including structural planting to strengthen existing vegetation and provide additional screening.
- Maintaining a northern buffer of public open space/green infrastructure with substantial opportunities for planting.
- Avoiding unnecessary light pollution to maintain dark skies in the High Weald National Landscape.

With sensitive design and thoughtful planning, this parcel offers a valuable opportunity to deliver new homes that are well integrated with the landscape and local context.



View north-east across Parcel D from near the Pillbox



View south across Parcel D from the northern site boundary

6.0 Design Principles

The following design principles can be used to shape a high-quality and contextually responsive development on the Site. These principles aim to celebrate the Site's character, enhance its setting, and contribute positively to the local area:

Development Envelope

- Use natural topography to inform the hierarchy of density and configuration of land parcels.
- Secure a scale and form of residential development which reflects the character of Hodson's Mill and the surrounding built form.
- Protect and frame key views southward across the landscape, enhancing the connection to the wider countryside.

Materiality and Heights

- Consider an architectural response that integrates well and takes visual cues from the local vernacular, including the historic buildings on Site.
- Limit building heights to a maximum of two storeys, with opportunities to diversify the roofscape and create visual interest.

Green Infrastructure

- Protect and incorporate existing Green Infrastructure features as integral elements of any proposed development.
- Retain the historic field boundary hedgerow between the Parcels C and D to preserve landscape structure and time-depth.

- Enhance public access through the Site with new pathways and connections to the surrounding landscape.
- Provide a clear hierarchy of public and private green spaces, fostering community interaction and a strong sense of place.
- Maximise the ecological and visual potential of the River Rother corridor through sensitive design and planting.
- Consider the inclusion of new areas of woodland along the northern site boundary. Many of the upper slopes of the valley and the skyline are already characterised by woodland in this area so the addition of more trees would be in keeping with the surrounding area.
- At detailed design, seek to use native tree and woodland species and prefer those present in the context of local landscape character.

National Landscape

- Seek opportunities to enhance the National Landscape and contribute positively to AONB Management Plan objectives.

These design principles can be taken forward through an iterative approach to inform an evolving design process at an increasing level of detail through the planning process.

7.0 Illustrative Masterplan

The Illustrative Masterplan presents one potential form of development subject to further refinement.

The key principles include:

1. Existing Public Rights of Way to be retained and incorporated into areas of Green Infrastructure.
2. The historic hedgerow to be retained to provide a mature landscape setting to the proposed development.
3. Existing boundary vegetation to be retained where possible and enhanced with new planting. This will maintain or enhance the current level of screening and create a soft transition into the wider landscape.
4. Residential development areas are separated by green links and areas of public open space.
5. Areas of open space, both formal and informal in character, provide focal points and corridors through the development and opportunities for recreation and children's play.



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Illustrative Masterplan

8.0 Effects on the High Weald National Landscape

Special Qualities

Table 1: Effects on the special qualities of the High Weald National Landscape

Special Quality	Current Contribution of the Site	Effects of Development	Mitigation/Enhancement Measures
Natural systems (geology, soils, water and climate) – a deeply incised, ridged and faulted landform of clays and sandstone with highly variable, relatively undisturbed soils and numerous headwaters (gill streams) functioning under an oceanic climate.	<p>Natural systems mapping for the High Weald National Landscape indicates that the Site has a geological bedrock composed of Cretaceous Chalk.</p> <p>The River Rother flows through the Site and small tributaries characterise its immediate surroundings. The mill pond is south-west of the Oast House.</p>	<p>Short-Term</p> <p>Temporary disturbance to the existing ground levels arising from the removal and storage of topsoil, and excavation for roads, foundations, drainage, and other infrastructure.</p> <p>Long-Term</p> <p>Permanent earthworks and changes to land cover, including existing hard standing areas, agricultural land, and vegetation.</p>	<ul style="list-style-type: none"> Areas of grassland along the northern edge of the Site and existing vegetation to be enhanced, providing ecological benefits. Soil analysis and planting palette suitable and beneficial to soil composition and landscape character. Planting strategies focused on climate resilience and longevity. Potential through development to enhance the existing watercourse habitat e.g. through new planting or landscape management.
Settlement – dispersed historic settlement including high densities of isolated farmsteads, hamlets and late medieval villages founded on trade and non-agricultural rural industries.	The historic settlement of Northbridge Street is to the east of the Site. The associated Conservation Area extends into the southern part of the Site, encompassing Hodson's Mill and the Grade II listed Oast House.	<p>Short-Term</p> <p>Short term disturbance associated with construction activity within the Conservation Area.</p> <p>Long-Term</p> <p>Expansion of existing settlement with some alterations to settlement pattern.</p>	<ul style="list-style-type: none"> Landscape setting of the Conservation Area around Hodson's Mill and the River Rother to be maintained and enhanced. Sympathetic building design respecting the character and settlement pattern of Northbridge Street Conservation Area e.g. building heights, density, materials.

8.0 Effects on the High Weald National Landscape

Special Quality	Current Contribution of the Site	Effects of Development	Mitigation/Enhancement Measures
Routeways – a dense network of historic routeways (now roads, tracks and paths).	<p>Historic Routeway mapping for the High Weald National Landscape identifies a historic routeway - along the route of PRoW [Footpath SAL/8/1] through the Site and a historic routeway - road to the west of Hodson's Mill and extending north towards Wennow Wood.</p> <p>The PRoW is publicly accessible but the historic road is not subject to public access.</p>	<p>Short-Term</p> <p>Some short-term disturbance to recreational users of PRoW.</p> <p>Long-Term</p> <p>Negligible impacts with potential enhanced access to the wider countryside.</p>	<ul style="list-style-type: none"> Enhanced connectivity between the Site and the wider landscape through additional linkages. Potential for re-interpretation of historic routeway within the Site.
Woodland – an abundance of ancient woodland mostly in small holdings, highly interconnected with hedges and shaws.	<p>There is no ancient woodland within the Site or its immediate surroundings. The southern part of the Site near the River Rother has a wooded character.</p>	<p>Short-Term</p> <p>No impact.</p> <p>Long-Term</p> <p>No impact.</p>	<ul style="list-style-type: none"> Existing extent of woodland to be maintained and brought into regular management. Potential to enhance and protect the existing feature through the strengthening of edges with woodland edge or understorey planting.
Fieldsapes and heath – small, irregular and productive fields, bounded by hedgerows and woods, and typically used for livestock grazing; with distinctive zones of lowland heaths and inned river valleys (reclaimed marshland).	<p>Fieldscape mapping for the High Weald National Landscape shows the historic field boundary between Parcels C and D. This characteristic is consistent with the surrounding landscape, which includes small parcels of other field system types. The Site and its surroundings are not part of a medieval forest. Part of the Site is medieval field system (yellow fill).</p>	<p>Short-Term</p> <p>No impact - assuming historic field boundary to be retained.</p> <p>Long-Term</p> <p>No impact - assuming historic field boundary to be retained.</p>	<ul style="list-style-type: none"> The historic field boundary between Parcel C and Parcel D to be retained. Potential for restoration of river valley habitat, particularly along the Mill Race.

8.0 Effects on the High Weald National Landscape

Special Quality	Current Contribution of the Site	Effects of Development	Mitigation/Enhancement Measures
Dark night skies – intrinsically dark at night with our own galaxy (the milky way) visible.	Dark night skies mapping for the High Weald National Landscape illustrates that the Site is in an area of medium district brightness, characteristic of well-inhabited rural and urban settlements.	<p>Short-Term</p> <p>Introduction of temporary lighting associated with construction activities.</p> <p>Long-Term</p> <p>Some additional lighting associated with any development, typical of an urban area.</p>	<ul style="list-style-type: none"> Temporary lighting to be kept to the minimum necessary for safety and security and appropriately located to minimise light spill on the surrounding landscape. Design of lighting to be sympathetic to the dark skies of the High Weald National Landscape.
Aesthetic and perceptual qualities – arising from the interaction of people with the landscape, including the notion of a quintessential English pastoral landscape, intimacy of scale, a sense of history and timelessness; rurality and tranquillity; glimpsed long views; freedom to explore and make connections with the natural world, and a rich legacy of features and ideas left by writers, poets and gardeners inspired by the landscape.	<p>The Site has limited sense of rurality and tranquillity due to its proximity to Northbridge Street. Traffic on nearby roads is audible from within the Site. There are some far-reaching views across the valley from the north of the Site.</p> <p>The Kent and East Sussex heritage railway is proposed to extend east, terminating in Robertsbridge, and passing the southern boundary of the Site.</p>	<p>Short-Term</p> <p>Construction activity will adversely impact the perceptual qualities of the landscape for the short-term through the introduction of traffic movements, noise and operation of machinery.</p> <p>Long-Term</p> <p>Perceptual qualities will be similar to the existing, but with an increase in the extent of built form visible from the Site's immediate surroundings.</p>	<ul style="list-style-type: none"> Existing vegetation along the boundaries of the Site to be retained to limit intervisibility with surroundings. Development to be integrated in the landscape and connected to existing countryside areas. Opportunity to promote the connection of people and the surrounding landscape through a public art, signage and heritage strategy.
Land-based economy and rural living – with roots extending deep into history, and which has visibly and culturally shaped the landscape	The Site does not contribute to the land-based economy and is currently not in active use. The Site contains designated and non-designated heritage assets including the Grade II Listed Oast House and Hodson's Mill.	<p>Short-Term</p> <p>No impact - but potential to integrate existing heritage assets within any proposed development.</p> <p>Long-Term</p> <p>No impact - but potential to integrate existing heritage assets within any proposed development.</p>	<ul style="list-style-type: none"> Existing heritage assets to be incorporated within proposed development where possible. Potential to provide interpretation. Opportunity to promote the connection of people and the surrounding landscape through a public art, signage and heritage strategy.

8.0 Effects on the High Weald National Landscape

Objectives

Table 2: Contribution to AONB Management Plan Objectives

Ref	Objective	Commentary	Positive/Negative/Neutral
Natural Systems			
G1	To restore the natural function of rivers, water courses and water bodies.	Proposed Development designed to protect river catchments taking into account planning policies and best practice e.g. SuDS. Potential to enhance riverside habitats.	Neutral - Positive
G2	To protect landform and geological features including sandstone outcrops.	Best practice to be complied with to protect soils during construction from compaction, pollution and erosion. Undisturbed soils to be protected and measures should be taken to minimise sterilisation of soils by permanent impermeable surfaces.	Neutral
G3	To pursue net zero across the High Weald without compromising its characteristic landscape beauty.	Contribution to climate change mitigation and adaption through design and compliance with planning policies and best practice.	Neutral
G4	To restore soil health across the High Weald.	Limited opportunities to contribute to this objective. Existing soils to be re-used on Site.	Neutral
Settlement			
S1	To protect the historic pattern and character of settlements.	The Site will be designed according to the principles set out in the High Weald Housing Design Guide.	Positive
S2	To enhance the architectural quality of the High Weald and ensure new development reflects the character of the High Weald in its siting, scale, layout and design.	The Site will be designed according to the principles set out in the High Weald Housing Design Guide and the High Weald AONB Colour Study. Appropriate use of colour for the buildings may help to reduce the visual impact.	Positive
S3	To conserve the distinct built heritage of the High Weald.	Existing heritage assets to be retained and incorporated into the Proposed Development where possible.	Positive
Routeways			
R1	To maintain the historic pattern, morphology and features of routeways.	The Proposed Development will be designed with reference to the historic routeways. Potential to re-instate alignment of historic road identified in National Landscape mapping data.	Positive
R2	To protect and enhance the ecological function of routeways.	The Proposed Development will seek opportunities in its design to improve the ecological function of routeways.	Positive
Woodland			
W1	To maintain and restore the existing extent and pattern of woodland cover and particularly ancient woodland.	No ancient woodland within the Site or its immediate surroundings. Limited woodland cover on-site. Existing woodland to be enhanced through the strengthening of edges and long-term management strategy.	Neutral - Positive
W2	To protect and restore the ecological quality and functioning of woodland at a landscape scale.	Any future development will use locally grown and local provenance stock for tree planting and avoid imported stock or soil.	Neutral

8.0 Effects on the High Weald National Landscape

Ref	Objective	Commentary	Positive/Negative/Neutral
W3	To protect the archaeology and historic assets of AONB woodlands.	Limited opportunities to contribute to this objective.	Neutral
W4	To increase the output of sustainably produced high-quality timber and underwood for local markets.	Any future development will seek opportunities to use local wood in its construction such as for any fencing and gates.	Neutral
Fieldscapes and Heath			
FH1	To secure agriculturally productive use for the fields of the High Weald, especially for local markets, as part of sustainable land management.	Limited opportunities for the Site to contribute to this objective.	Neutral
FH2	To maintain the pattern of small irregularly shaped fields bounded by hedgerows and woodlands.	The overall field pattern and historic field boundaries to be respected/retained.	Neutral
FH3	To protect and enhance the ecological function of field and heath as part of the complex mosaic of High Weald habitats.	Connectivity for wildlife will be maintained between the Site and its associated boundary features. The Site will achieve biodiversity net gain.	Positive
FH4	To protect individual archaeological features as well as historic assets and pattern of fields and heath.	Historic field boundary between Parcels C and D to be retained. Existing heritage assets to be retained and incorporated into any future development where possible.	Positive
Dark Skies			
DS1	To preserve the dark skies of the High Weald AONB by minimising light pollution, obtrusive external lighting and internal light spill from domestic, commercial and public premises in both existing and new developments within the High Weald, and from high-ways lighting.	Any future development will ensure that temporary lighting is kept to the minimum necessary for safety and security, that lighting is appropriately located to minimise light spill on the surrounding landscape and that the design of lighting is sympathetic to the dark skies of the High Weald National Landscape.	Neutral
DS2	To protect wildlife and habitats from light pollution across the High Weald.		Neutral
Aesthetic and Perceptual Qualities			
PQ1	To increase opportunities for learning about and celebrating the High Weald's character and aesthetic qualities, and to promote and facilitate contributions by communities and individuals to the conservation and enhancement of the High Weald.	The Site would contribute to local communities and community services once it is occupied.	Positive
PQ2	To protect the unspoilt rural landscape with its intrinsic sense of naturalness, valued views, and the extent of green space which foster experiences of rurality and tranquillity.	Limited opportunities for the Site to contribute to this objective. New areas of green space provided as part of the Proposed Development.	Neutral
PQ3	To foster and promote equitable access and informal enjoyment of the High Weald landscape and the integrated management of its resources for the enjoyment of natural beauty by all.	The Proposed Development will allow access to parts of the Site and landscape beyond contributing to this objective.	Positive

8.0 Effects on the High Weald National Landscape

Ref	Objective	Commentary	Positive/Negative/Neutral
Land Based Economy and Rural Living			
LBE1	To improve returns from, and thereby increase entry and retention in, farming, forestry, horticulture and other land management activities that conserve and enhance natural beauty.	Limited opportunities for the Site to contribute to this objective.	Neutral
LBE2	To reconnect settlements and residents with the surrounding countryside, and maintain and improve rural amenities and services that support communities within the context of the rural settlement pattern.	Providing housing at the Site would contribute to maintaining and improving local community services.	Positive
LBE3	To improve agricultural and forestry infrastructure (including the provision of appropriate affordable housing and workspaces for land-based workers), along with skills development for rural communities and related sectors that contribute positively to conserving and enhancing natural beauty.	The Site may contribute to local communities and community services once it is occupied.	Neutral
Other Qualities			
OQ1	To increase opportunities for learning about and celebrating the character of the High Weald	There would be opportunities for the Site to contribute to this objective through promotion of the High Weald AONB such as through interpretation boards, signage and public art.	Positive
OQ2	To increase the contribution of individuals and communities to the conservation and enhancement of the AONB	There may be opportunities for the Site to contribute to this objective through promotion of the High Weald AONB.	Neutral
OQ3	To develop and manage access to maximise opportunities for everyone to enjoy, appreciate and understand the character of the AONB while conserving its natural beauty	The Proposed Development will allow access to parts of the Site and landscape beyond contributing to this objective.	Positive
OQ4	To protect and promote the perceptual qualities that people value	Any future development will consider lighting and noise in its design taking into account planning policies and best practice.	Neutral

9.0 Conclusion

Conclusion

It is not considered that development of the Site will alter any of the key landscape characteristics or introduce a discordant element in the existing setting when viewed from the wider landscape.

Subject to architectural proposals which are consistent in scale and composition with the setting of Northbridge Street and Robertsbridge, residential development would not appear incongruous.

The Hodson's Mill parcel benefits from a Neighbourhood Plan allocation and the principle of redevelopment has been accepted previously with planning permission being granted, although now lapsed. As the least sensitive part of the Site in landscape terms, it presents the opportunity for redevelopment with minimal impact on landscape character or views.

Parcels C and D are capable of accommodating development. Appropriate buffers and landscape mitigation and enhancement measures will ensure sensitive integration with the site's surroundings.

Whilst the Site is in the High Weald National Landscape, its location on the valley slopes of the River Rother means that it is generally well screened by existing vegetation. Through good design, future development provides the opportunity to contribute positively to the AONB Management Plan objectives.

Any future development will draw from the High Weald Housing Design Guide and other technical resources. Materials within the landscape and

architecture will reference the site history and local geology.

The layout and built form will be respectful of historic forms, and retain existing and historic movement through the Site and connection with the surrounding area.

The landscape will connect with the existing green infrastructure network with proposals connecting habitats and supporting sustainable drainage.

Outdoor spaces will be designed with native, climate resilient planting with access complimented with minimal and down facing lighting to preserve dark skies.

Most importantly, the Site will provide a place where people can engage with nature and enjoy the High Weald National Landscape.

Taking into account the identified opportunities and constraints, it is concluded that the Site is able to accommodate sensitively designed residential development which would conserve and enhance the landscape and scenic beauty of the National Landscape (High Weald AONB) and Robertsbridge Conservation Area.

Any future planning application will be accompanied by a Landscape and Visual Appraisal to thoroughly assess potential landscape and visual effects within the locality and inform the masterplanning process.

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Appendix C: Site Boundary



Hodson Mill, Robertsbridge
 Client: Homes England

Figure 2:
 Site Boundary

Scale: 1:2500@A3
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