

**REGULATION 18 LOCAL PLAN CONSULTATION  
ROTHER DISTRICT COUNCIL**

**REPRESENTATIONS MADE IN RESPECT OF LAND OFF NORTH TRADE  
ROAD, BATTLE, TN33 0HN**

**ROTHER DISTRICT COUNCIL**

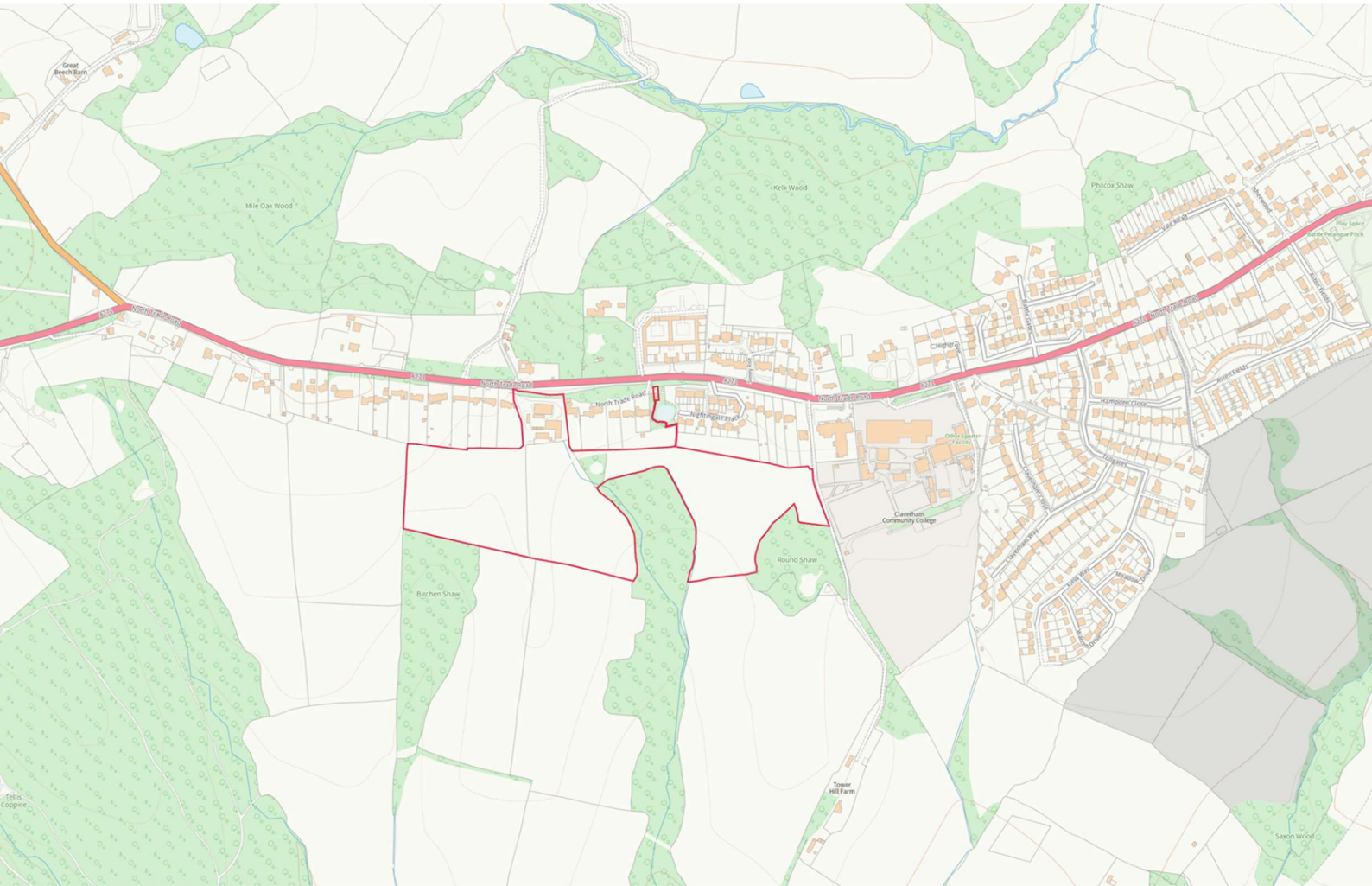
**ON BEHALF OF THE LANDOWNERS AND RUBIX ESTATES**



**RUBIX ESTATES**

**RUBIX ESTATES REF: LTR/1031**

**March 2026**



**REPORT CONTROL**

<b>Project:</b>	Land off North Trade Road, Battle
<b>Client:</b>	Mr G Cartwright, Ms P Cartwright, Ms B Cartwright and Ms J Clinton
<b>Reference:</b>	1031
<b>Primary Author</b>	GM
<b>Checked By:</b>	GM

Issue	Date	Status	Checked by
1	23 March 2026	FINAL	GM

## INTRODUCTION

### Background

These representations have been prepared by Rubix Estates in response to the current 'Draft Local Plan 2020-2040 Regulation 18' consultation, which runs until 23 March 2026. The Draft Rother Local Plan (RLP) consultations marks a significant stage of the production of a new Local Plan to replace Rother's Core Strategy (2014) and Development and Site Allocations (2019) Plans. Getting an up-to-date strategic plan that facilitates the delivery of much needed new housing is critical in the context of a national housing crisis. The landowner and Rubix Estates welcome this significant stage and are keen to work with Rother District Council in relation to the land in Battle.

The Council's Development Strategy confirms that growth will be directed towards existing settlements, including through extensions where supported by services, facilities and sustainable transport connections. In this context, the Site represents a logical and sustainable extension to Battle, fully aligned with the Council's preferred spatial approach.

The Draft Local Plan allocates land for new homes, jobs, new schools, a new hospital and community uses as well as outlining policies designed to guide the quality and density of developments, boost biodiversity, protect valued open spaces over the long term and to ensure any new development minimises its contribution to climate change while also mitigating against its effects.

In so doing, it identifies for consideration land off North Trade Road, as an available, achievable and deliverable site in the context of meeting district-wide housing need over the plan period.

The land lies within the administrative boundary of Rother District Council and can accommodate new sustainable homes both market and affordable. A Site Location Plan is provided in **Appendix 1**.

The land measures approximately 8.30 hectares located outside of, but immediately adjacent to the settlement boundary of Battle. Battle has been identified in Regulation 18 Document as one of the key areas to accommodate new residential development. The Core Strategy recognises Battle as a sustainable location for growth being behind only Bexhill within the spatial distribution strategy.

The Development Strategy is also explicitly informed by the availability of deliverable sites identified through the HELAA, with options discounted where there is insufficient land to support delivery in practical terms. It is therefore essential that sites which are demonstrably suitable, available and achievable, such as this Site, are properly considered to ensure the strategy remains deliverable

Furthermore, as per the "Vision for Battle and Surrounding Settlements" in the Regulation 18 Document, it goes on to say that-

*A greater amount of sensitive growth will take place south of North Trade Road and west of Hastings Road with linked opportunities for habitat creation, restoration, enhancement and community access.*

This land in Battle is one of the few options available for future residential development which is deliverable for new development. There are no constraints to access the development with access achievable from both North Trade Road and through the Dandara new development being built out to

the north. The landowners owned the Dandara site (plan below) and have reserved access rights for services, vehicles and pedestrian links.



The land is not subject to any heritage designations and although located just outside of the defined settlement boundary, the land is subject to no landscape designations other than falling within the High Weald National Landscape (NL) which covers circa 83% of Rother District and represents around 29% of the total area of the High Weald National Landscape. In addition to the NL, there are also nationally sensitive ecological locations within Rother District, which means that over 90% of the authority area is constrained and there are flooding issues on the remaining land. The land is however within Flood Zone 1 and subsequently has the lowest fluvial risk of flooding.

In terms of the wider area, within Battle, there is a range of local facilities, including a high street, which offers a range of shops, a super market, post office, dentist, doctors, various eateries and other local services for the wider community.

There is also a small supermarket adjacent to the High Street, and, nearer to the Site, the Battle Sports Centre and Claverham Community College. These facilities are all within a short walking distance of the Site.

There are also local public transport services in the area, with bus stops located throughout the area providing services to areas including Hawkhurst, wider Battle, Bexhill, Hastings, Baldstow and St Helens. The Battle train station offers hourly services between Hastings and London.

Battle is an historic town that has evolved from its direct links to the 1066 Battle of Hastings. Battle Abbey is understood to have been built upon the location where Harold fell in battle and sits on the Battle ridgeline which extends south-eastwards from Hadlow Down to the cliffs at Farlight. The Abbey and church occupy the highest point of the ridge and the historic High Street follows the ridgeline through to Upper Lake.

The High Street comprises a range of historic buildings, some of which were built around the time of the abbey, and others which sought to replicate this historic style as the town grew over time.

In view of the above, these representations seek to ensure that the policies of the Rother Local Plan 2020 – 2040 (the Draft Local Plan) do not unnecessarily inhibit the future allocation of the site.

As the Draft Local Plan and the evidence base acknowledge, constraints to the supply of new housing are contributing to worsening levels of affordability and resultant socioeconomic consequences.

The emerging strategy must, therefore, be revisited. This necessarily means re-examining the potential for development at the edge of Battle, which is one of the largest and most sustainable settlement in the Rother District and where additional growth should be accommodated.

As per Figure 35: Opportunities for housing growth by Parish area, Battle is considered as one of the few areas for “Greater opportunities for growth” (see below).

Figure 35: Opportunities for housing growth by Parish area

Greater opportunities for growth	Medium growth opportunities	Low growth opportunities	Limited growth opportunities
Battle*	Brede	Beckley	Ashburnham & Penhurst
Bexhill	Burwash*	Camber	Bodiam
Rye*	Catsfield	Crowhurst*	Brightling
Salehurst & Robertsbridge*	Hurst Green*	Etchingam*	Dallington
Ticehurst*	Icklesham	Ewhurst	East Guldeford
Westfield	Peasmarsh*	Fairlight	Mountfield
	Sedlescombe*	Guestling	Pett
		Iden	Udimore
		Northiam	Whatlington
		Playden	
		Rye Foreign	

\*These parishes have either adopted or are preparing Neighbourhood Plans

## LAND LYING OFF NORTH TRADE ROAD, BATTLE

### Site Description

Land off North Trade Road extends to approximately 8.30 hectares. The land is currently used for grazing includes some agricultural outbuildings.

The site is sustainably located being less than one mile, which is a 15 minute walk or 5 minute cycle, from Battle town centre. A range of core local services can be found even closer including Claverham college, day nursery and Battle sports centre, all of 4 which are a 5 minute walk from the site.

Battle and Langton primary school is a similar distance from the site as the town centre. From a sustainable transport perspective, there are bus stops immediately outside the site which are served by a variety of routes including no. 95 which provides access into the town centre in less than two minutes. Battle railway station is located 1.8 miles to the south-east being a circa 10-minute cycle.

The site is therefore considered to be sustainably located to provide ease of access, including via public transport modes, to the range of shops, services and community facilities available in Battle town centre.

In strategic terms, the Site represents one of the few realistic opportunities to deliver sustainable development on the edge of Battle. The Council's preferred approach prioritises development within or adjacent to existing settlements, rather than isolated countryside locations. The Site's immediate relationship with the built form of Battle strongly aligns with this principle.

In due course, Rubix Estates and the landowner will engage with Rother District Council and East Sussex County Council to discuss the technical and masterplanning work that is being undertaken. The intent will be to satisfy these respective parties that a credible and developable proposition exists. This will confirm that the land represents a viable and credible option for allocation and development.

The proposed development takes place within a site that whilst falling in the NL is not subject to any other constraints. It is in the lowest risk flood zone, it has no heritage or ecological designations and is located immediately adjacent to the defined settlement boundary

The severe shortfall in housing land supply in the District and the need to deliver market and affordable housing in Battle represent exceptional circumstances that justify the proposal, even if regarded as a "major" development for the purposes of paragraph 116. Meeting housing need is fundamentally in the public interest.

The Development Strategy acknowledges that development within the High Weald National Landscape will be necessary to meet housing needs. It further confirms that major development may be justified in exceptional circumstances where it is in the public interest, including to deliver housing in sustainable locations. The Site should therefore be assessed within this context.

Moving on to the actual impact of development on the NL and wider landscape, the relationship of the Site to its surroundings is material. The Site has a direct relationship to Battle, being partially contained by the existing built-up area immediately to the east and west.

The NPPF attaches great weight to the delivery of housing, with paragraph 47 setting out that LPAs should seek to boost significantly the supply of housing in their area and seek to approve development that is sustainable in the context of the presumption. It is therefore essential to ensure that housing which is sustainable can be delivered as soon as possible, with the most efficient use of those sites being made

In summary, the Site represents a rare combination of attributes within the District, namely:

- Immediate adjacency to the built-up area of Battle
- Strong access credentials, including multiple points of access
- Limited technical or environmental constraints relative to the wider District
- A clear ability to deliver within the early phases of the Plan period

As such, the Site should be considered a priority opportunity for allocation.

## CONCLUSION

These representations have been prepared by Rubix Estates in response to Rother District Council's Draft Local Plan Regulation 18 consultation.

Rubix Estates supports the preparation of a new Local Plan for the Rother District, which will contribute to the provision of new housing and future sustainable development. However, as presently drafted, the emerging Local Plan does not satisfy the tests of soundness detailed in legislation and expressed in NPPF paragraph 35.

Indeed, a key concern is that the proposed housing requirement/target falls well short of the LHN identified through the Standard Method. This is also the case for the neighbouring Hastings Borough, which is intrinsically linked to Rother and agreed to form part of a joint HMA. Based on the approach currently proposed in both emerging Local Plans, there is a risk that less than half of identified housing needs will be addressed across the HMA. The provision of new affordable housing is also likely to be well below what is needed, resulting in negative socio-economic outcomes.

Rubix Estates recognises that statutory constraints and designations prevail across parts of the Plan Area. However, there would appear to be scope to identify additional sites, that are suitable for allocation and development, to meet needs either in full or at least more substantively.

The Development Strategy confirms that growth should be focused on sustainable locations, including at the edge of existing settlements, and informed by the availability of deliverable sites. In this context, Land off North Trade Road represents a clear and deliverable opportunity to contribute towards addressing the district's housing needs in a sustainable manner.

Accordingly, Rubix Estates maintains that the Draft Local Plan needs to be revised substantively before it can progress to the next consultation stage and subsequent Examination.

The scale of under-delivery proposed through the emerging Local Plan is significant and risks the Plan being found unsound at Examination. In this context, it is essential that all suitable, available and achievable sites are identified and brought forward. The omission or under-utilisation of such sites, including Land off North Trade Road, would further exacerbate the identified shortfall and undermine the effectiveness of the Development Strategy.

In summary, Land off North Trade Road represents a sustainable, deliverable and logical extension to Battle, fully aligned with the Council's spatial strategy. In the context of a significant and acknowledged housing shortfall, the Site provides a clear opportunity to contribute towards meeting housing needs in a manner consistent with national policy.

## **APPENDIX 1 – SITE LOCATION PLAN**