

Planning Policy
Rother District Council
Town Hall
London Road
Bexhill on Sea
East Sussex
TN39 3JX

23 March 2026

BY EMAIL ONLY

Dear Sir/Madam

**Consultation response to Regulation 18 Rother Local Plan Review
Draft Allocation SD11 - Land North of Brede Lane, Sedlescombe**

1. Introduction

- 1.1 We are writing in response to Rother District Council's Regulation 18 consultation on the Draft Local Plan 2025-2042 and wish to provide the following comments. We have an agreement in place with the landowner of 'Land to the north of Brede Lane, Sedlescombe (HELAA SED0032) to promote the land for housing through the Council's Local Plan Review.
- 1.2 The consultation follows a previous Regulation 18 consultation on the draft Local Plan which took place in April 2024, which we also provided representations. The consultation sought views on the proposed development strategy, vision and objectives, along with policies on specific topic area such as housing, economy, the environment landscape, heritage, design and infrastructure. This Regulation 18 consultation now seeks views on the proposed site allocations which have been identified to deliver the updated spatial strategy and some area specific policies related to the options for strategic growth.
- 1.3 The purpose of this representation is to support the strategic growth identified for Sedlescombe and the inclusion of 'Land north of Brede Lane, Sedlescombe under draft Policy SD11.
- 1.4 In light of RDC's significant housing need, Land north of Brede Lane, Sedlescombe is well placed to deliver a high quality development which responds to the surrounding landscape and assists in delivering much needed new homes to this sustainable village.

2 Deliverability of Site Allocation SD11

Site location and description

- 2.1 The proposed site allocation comprises a 2.8 ha area of land to the north of Brede Lane, Sedlescombe. The allocation has been assessed under Site Reference SED0032 in the Rother Housing and Economic Land Availability Assessment (HELAA). This assessment has been updated following the submissions we made to the Regulation 18 consultation in July 2024 and the subsequent Call for Sites consultation and we welcome the Council's reconsideration to the suitability of the site for housing.

- 2.2 The site comprises a single agricultural field with woodland on its eastern and western boundaries. It fronts onto Brede Lane and the settlement edge of Sedlescombe to the south.
- 2.3 It lies in close proximity to the centre of Sedlescombe where there is a good range of facilities including a primary school, GP surgery, post office, shop, pub and village hall.

Access

- 2.4 The current point of entry into the site is taken from a field gate in the eastern corner from Brede Lane.
- 2.5 The site benefits from a continuous footpath which runs along Brede Lane providing access to the village, its services and public transport links. The recently consented scheme immediately to the south of this site (RR/2022/2619) for 21 units proposed some improvements to footpath links along Brede Lane and was found to be acceptable by both the LPA and the Highway Authority.
- 2.6 The existing access point will be widened to provide a suitable vehicular access into the site to serve the new homes. There are also opportunities to provide a further pedestrian/cycle access onto Brede Lane to assist with connectivity.

Accessibility

- 2.7 The site is well located in relation to local services and public transport to support a pattern of well contained growth.

High Weald National Landscape

- 2.8 The site falls within the boundary of the High Weald National Landscape. This is a designation which washes over the whole of Sedlescombe. Despite its position within the National Landscape, the site makes a logical area to extend the settlement boundary as it follows the established pattern of growth.
 - 2.9 As part of our previous representations to the Regulation 18 in 2024, a Landscape and Visual Assessment has been undertaken by LDA Design to evaluate potential landscape and visual effects arising from the future development. The assessment identified opportunities to mitigate and avoid significant adverse impacts, while also exploring potential for local landscape enhancements.
 - 2.10 The LVA concludes that whilst the existing land use and character of the site would change as a result of the development, it is anticipated that any large scale effects on the landscape would be largely contained to the site and its immediate surroundings. Furthermore beyond the site and its immediate context, the proposed development would be perceived as part of the existing settlement area, occupying a similar location, extent and topography as the East View Terrace residential area and not extending any further eastwards or northwards than the existing settlement area.
 - 2.11 The existing surrounding woodland provides a definitive outer edge to the east of the village, containing development and limiting the sense of sprawl and encroachment into the wider countryside. The LVA also notes that there would be no discernible change to the key characteristics of the wider landscape.
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- 2.12 The LVA concludes that the site can support a well considered residential scheme, provided that appropriate mitigation and enhancement measures are implemented. Design recommendations arising from the LVA include:
- Ensure the proposed development has a positive relationship with East View Terrace with appropriate frontage and connections
 - Careful consideration to buildings heights
 - Preserve and enhance existing vegetation and ancient woodland by applying appropriate offsets;
 - Provide new tree and hedgerow planting to maintain the field structure and integrate development into the landscape
 - Maintain the character of Brede Lane
- 2.13 These recommendations have been incorporated into the design process as shown in the Landscape Vision Document submitted following the Call for Sites consultation in August 2025, ensuring that the proposed development remains visually contained and sympathetic to the character of the High Weald.

Trees and Ecology

- 2.14 Woodland bounds the site on its eastern and western boundaries. Park Shaw woodland to the east of the site is classified as ancient woodland. The illustrative plans demonstrate that the development can accommodate the requisite 15m buffer zone around the ancient woodland, in line with Natural England's Standing Advice.
- 2.15 The woodland to the west is covered by a Tree Preservation Order but these trees fall outside the allocation boundary.
- 2.16 The site is part Grade 3 and part Grade 4 Agricultural Land. Whilst it is yet to be determined whether the part of the site which is Grade 3 does qualify as best and most versatile agricultural land as defined by the NPPF, the development of this site would only result in a very small loss.
- 2.17 The site is cultivated and therefore it currently has fairly low biodiversity interest and habitats will likely be limited to the site boundaries. The proposals indicate 50% of the site will be available for open space and landscaping, therefore it is fully anticipated that Biodiversity Net Gain will be achieved through onsite enhancements.

Heritage

- 2.18 There are no heritage assets on the site, the closest listed building is 200m to the east; 1 and 2 Brede Farm Cottages. There is no intervisibility between the site and Brede Farm Cottages and the proposed development will not affect the importance or setting of the Listed Building.
- 2.19 The site does not fall within a Conservation Area, Sedlecombe Conservation Area covers the centre of the village and is located 475m to the west of the site.
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Flood Risk/Drainage

- 2.20 The site is located wholly within Flood Zone 1 which means that the site is at a low risk of flooding from nearby rivers and the sea. There are some areas at risk of surface water flooding on the eastern boundary of the site, however the risk is largely contained in the woodland.
- 2.21 All development can be proposed outside of areas at risk of surface water flooding. Any future application will include a Flood Risk Assessment and drainage strategy

Availability and Deliverability

- 2.22 For the reasons set out in this section the site is considered suitable for residential led development.
- 2.23 To be considered deliverable sites for housing should be available now, offer a suitable location for development and be achievable with a realistic prospect that housing will be delivered on the site within 5 years.
- 2.24 There are no known impediments to the site being able to commence within 5 years. There are also no physical limitations or problems such as access, infrastructure, flood risk, hazardous risks, pollution or contamination.
- 2.25 In terms of availability, Catesby Estates has a legal interest in the site and this reflects the landowner's willingness to make the land available for development. There are no known viability issues or third-party constraints present and there are no impediments to the site being allocated for development commencing early within the Plan period.

3 Response to Consultation

- 3.1 This section provides a response to the consultation questions contained within the Consultation Document where there are of relevance to our interests.

Q1 – Do you have any comments on the amended Rother Local Plan Strategic Spatial Objectives shown in Figure 1?

- 3.2 We are supportive of Spatial Objectives 4 and 7 which seek to maximise opportunities for growth in sustainable locations, or places that can be made sustainable through supporting infrastructure and community facilities. As a largely rural district it is vital that the Council continue to explore opportunities for development in its rural communities to ensure these settlements can continue to thrive and prosper.

Q2 – 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?

- 3.3 We recognise that this figure of 8427 dwellings is a significant increase on the adopted figure. However at the time of writing, the Government's standard method figure for Rother sets a minimum target of 912 homes per annum, equating to a Plan period need of 15,504 homes. The Framework is clear that the standard method figure should be used to determine the

minimum number of homes needed, along with any needs that cannot be met within neighbouring areas which should also be taken into account in establishing the amount of housing to be planned for.

- 3.4 In this regard, the Hastings & Rother Housing and Economic Development Needs Assessment (February 2024) identifies close ties with the neighbouring authorities of Wealden, Tunbridge Wells, Eastbourne and in particular, Hastings which is on the basis of comparatively strong links. They are concluded to form a self-contained housing and functional economic market area with Rother. All four neighbouring authorities are subject to significant constraints and have historically underdelivered on housing.
 - 3.5 Notably, Hastings Borough Council is currently undertaking consultation on a new Local Plan Preferred Options Regulation 18 consultation which closes in April 2026. This consultation, following the undertaking of housing land availability evidence, indicates a new housing target of 3,141 to 3,373 homes for the Plan period based on land availability. By comparison, the standard method target equates to 12,546 homes.
 - 3.6 Elsewhere, both the Eastbourne and Wealden Local Plans to 2042 are undergoing simultaneous Regulation 18 consultations within which the challenges associated with sustainably delivering 14,280 and 16,609 homes respectively are stated from the outset.
 - 3.7 The Eastbourne Regulation 18 Plan proposes just 301 homes per year, compared to a target of 714 homes (approximately 42% of the standard method target), whilst the Wealden Regulation 18 Plan states that the Council does not currently consider that they can meet all of their development needs due to a lack of deliverable sites in sustainable locations.
 - 3.8 In addition, the recently adopted Tunbridge Wells Local Plan 2038 fails to deliver its housing need in full, containing land only sufficient for the first 10 years of the Plan and is subject to an immediate review to identify housing for the remainder of the Plan period.
 - 3.9 On account of the deeply concerning regional context, within which all four neighbouring authorities are struggling to meet even half of their housing requirement, it is vital that RDC explores whether it can accommodate the unmet need of neighbouring authorities and in particular Hastings, to which Rother shares its housing and functional economic market area, in addition to meeting its own needs.
 - 3.10 However, even without accounting for unmet needs from neighbouring authorities, at this stage the Local Plan would underdeliver annually by 417 homes, resulting in a shortfall of some 7,077 homes across the Plan period. This is even before a suggested minimum buffer of 5% for non-implementation is included, which would add a further 775 homes to the shortfall.
 - 3.11 The Framework is clear that in order to be found sound, Plans should be 'positively prepared'. This means providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs and wherever possible, the unmet need from neighbouring areas.
 - 3.12 The constraints within the District are fully acknowledged, however they are not unique to Rother and comprises principally the designation of much of the local authority area (83%) within the High Weald National Landscape. As the Council will be aware, whilst this invariably place additional expectations on new and particularly major developments, it is not prohibitive. The NPPF makes provision for major development (which itself is subjective and not necessarily development of more than 10 dwellings in accordance with the Town & Country Planning Act definition) in exceptional circumstances and where development is in
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the public interest. In this the context, the scale of the housing need and by the Council's own admission, the limited capacity of the non-National Landscape areas to accommodate the development needs, it is considered likely that exceptional circumstances exist to justify major development proposals within the National Landscape.

- 3.13 Such is the projected shortfall in the District, alongside the simultaneous shortfalls within the neighbouring authorities of Hastings, Wealden, Eastbourne and Tunbridge Wells, there is the potential for the major under-delivery of circa 50% in the housing market area for the foreseeable time horizons of the emerging Local Plans (circa fifteen years).
- 3.14 It cannot be underestimated the potential soundness risks that submitting the Plan with such a significant shortfall would present and we would cite the recent examination in Wiltshire, Horsham and Oxford in the last 24 months as examples of the challenges associated with submitting a Plan to examination that proposes to significantly under deliver against the standard method local housing need. Indeed, despite the Written Ministerial Statement (WMS) of 27 November 2025 effectively abolishing the Duty to Co-operate, Mid Sussex District Council has been pressed by the Inspector overseeing the Examination in Public to identify a significant number of additional sites to cater for unmet needs largely arising from Crawley and Brighton & Hove, on the basis that the WMS confirms that LPA's should "*continue to collaborate across their boundaries, including on unmet development needs from neighbouring areas,*"
- 3.15 Even should the Plan be found sound and successfully adopted, under the current Framework, Rother would be subject to a 20% buffer (effective six year supply) by virtue of paragraph 78(c) of the Framework, which is required for Plans whose annual average housing requirement is 80% or less of the most up to date local housing need figure using the standard method. At the time of writing, the Plan proposes just 54% of the standard method figure and in all likelihood would be subject to a 20% buffer on adoption.
- 3.16 At this stage of the process, the housing trajectory has not yet been published, however given historic supply and delivery in the District, it is in our view unlikely that the maintenance of a six year supply would be achievable and RDC's subsequent capability to resist speculative development, including in the National Landscape which the Council are rightly seeking to protect, would be severely diminished.
- 3.17 On account of all of the above, we strongly support the allocation of land north of Brede Lane, which must form a valuable component of RDC's deliverable supply. However, in the interests of ensuring a sound Plan, we strongly suggest that all draft allocation sites are appropriately considered and in addition, further suitable sites are sourced as part of the relaunched and ongoing 'Call for Sites' exercise to ensure the submission of a sound Plan.

Q8. Do you have any comments on the Council's proposed Overall Development Strategy?

- 3.18 We are supportive in principle of the overall development strategy, which recognises the unavoidable need to utilise land within the High Weald National Landscape to deliver the quantum of homes required across the Plan period. This is further demonstrated by the recognised shortfall of housing land in the consultation document, even with the identified site allocations and the potential need to accommodate some of the unmet needs of neighbouring districts.
- 3.19 The NPPF states that development should only be permitted in National Landscapes in exceptional circumstances, and where it can be demonstrated that the development is in the
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public interest. Whether a proposal is 'major development' 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. A similar assessment is contained within the emerging NPPF.

- 3.20 It is recognised that while the proposed site allocations have been assessed against their impact on the National Landscape through the HELAA, which is supported and necessary to identify the potential land supply, further assessment will be required to inform the final site allocations and policy requirements. Given the high bar of protection placed up on the National Landscape, in balance with the considerable and demonstrable need for new housing on land within the National Landscape over the Plan period, it is vital that a dedicated topic paper is produced at the earliest opportunity to demonstrate alignment with the NPPF and, importantly, the exceptional circumstances that justifies the allocation of sites within the National Landscape boundary.
- 3.21 For reasons set out in section 2 and with reference to the submitted Landscape Visual Appraisal and Landscape Strategy Document, it is clear that there are opportunities for the development of land within the boundaries of the National Landscape, in such a way that is both appropriate to its designation and locations that are influenced to a degree by existing settlement.

Q9. Do you have any comments on the proposed growth opportunities in the sub area as shown in Figure 10?

- 3.22 Notwithstanding the comments made on housing need, we are supportive of the overall strategy of allocating a portion of homes to Battle and surrounding settlements, including Sedlescombe.
- 3.23 We are supportive of the Council's vision for Battle and surrounding settlements and its acknowledgement that small levels of growth are needed to ensure the health and wellbeing of these villages are maintained and improved. Especially within Sedlescombe which is identified as a sustainable village with potential for growth, whilst recognising the need for sensitive development within the boundaries of the High Weald National Landscape.

Q12. Do you have any comments on the proposed Vision and development strategy for Battle and surrounding settlements including the development figures shown in Figures 20 and 21?

- 3.24 We support the overarching vision for Battle and surrounding settlements, in particular the recognition that Sedlescombe is a sustainable settlement and is the strongest performing village in this area for provision of services and facilities.

Q40. Do you have any comments on the proposed site allocations in Sedlescombe, detailed in Policies SD1 to SD11?

- 3.25 We strongly support the inclusion of Policy SD11 relating to the development of land north of Brede Lane, Sedlescombe for the reasons outlined in Section 2.
- 3.26 The submission evidence demonstrates that the concerns relating to the Ancient Woodland and surface water flooding can be suitably addressed with an appropriate layout.
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3.27 The development proposal is based on the following principles:

- The proposed development will deliver a policy compliant provision of affordable housing
- Significant landscape buffers are to be provided to the ancient woodland on the eastern boundary as well as appropriate offsets to the woodland on the western boundary. The residential development will be setback providing at least 15m buffer from the ancient woodland boundary;
- Retention and enhancement of existing landscaping and hedgerows where possible;
- Vehicular access to be achieved from Brede Lane;
- Pedestrian and cycle links to be provided onto Brede Lane and connect into the existing footpath network;
- Additional infrastructure such as significant open space allowing for attenuation basin, recreational routes and areas of play.

2.28 A review of the draft policy wording has been undertaken in the table below.

Draft Policy Wording	Response
1. <i>Provide a policy-compliant amount of on-site affordable housing in line with policy HOU2 of the Rother Local Plan</i>	No Comment. This can be achieved as outlined above
2. <i>Be informed by a landscape sensitivity assessment to determine an appropriate layout, form and detailed design to ensure the conservation and enhancement of the landscape and character of the High Weald National Landscape.</i>	<p>The Landscape Vision Document sets out the parameters by which a appropriate scheme can come forward. Further technical work will be undertaken as part of a future planning application.</p> <p>While it is possible to deliver a landscape led development for this site, there will inevitably be a localised impact on the National Landscape. As such we request that the wording be revised to state:</p> <p><i>“...Be informed by a landscape sensitivity assessment to determine an appropriate layout, form and detailed design in recognition of the site’s location within he High Weald National Landscape.”</i></p>
3. <i>Include areas of green infrastructure to include public open space and Biodiversity Net Gain, in line with the ratios indicated above, the location of which is to be determined through the landscape sensitivity assessment.</i>	Support. The supporting evidence submitted to date show the site is capable of providing significant areas of open space to meet this policy.
4. <i>Include a new vehicular access from Brede Lane</i>	Support.
5. <i>Include new pedestrian and cycle links to Brede Lane</i>	Support
6. <i>Include provision for the retention and future management of a buffer zone of semi-natural habitat, at least 15 metres</i>	This policy must continue to be aligned with Natural England’s Standing Advice of 15m where development adjoins areas of Ancient

<p><i>wide (which does not include residential gardens), on the eastern and western boundaries, between the edge of development and the ancient woodland and priority habitat;</i></p>	<p>Woodland. The woodland to the west of the site is not Ancient Woodland and therefore a 15m buffer is not necessarily required to ensure the protection of this priority habitat. The application will be supported by technical assessments which will fully assess these habitats and the mitigation required to ensure they are appropriately protected.</p> <p>As such we request that the wording be revised to state:</p> <p><i>“Include provision for the retention and future management of an appropriate buffer zone, at least 15 metres wide (which does not include residential gardens), on the western boundary with the ancient woodland. Appropriate protection should be given to the priority habitat on the eastern boundary.”</i></p>
<p>7. <i>Retain and enhance the existing hedgerow on the southern boundary of the site, save for a short section to be removed to facilitate an access</i></p>	<p>We are supportive of this policy requirement in principle. The exiting hedgerow is an important landscape feature of the site. It is recognised that some loss will be required to facilitate an access into the site. This should include for all means of access including vehicles, pedestrians and cyclists in line with other requirements set out in this policy.</p> <p>We request that the policy is revised to include:</p> <p><i>“Retain and enhance the existing hedgerow on the southern boundary of the site, save for where removal is necessary to facilitate access which includes vehicular, pedestrian and cycle.”</i></p>
<p>8. <i>Be carried out in accordance with the recommendations contained within a Flood Risk Assessment</i></p>	<p>Support</p>
<p>9. <i>Include sustainable drainage in the south-eastern section of the site in accordance with Policy ENV2 of the Rother Local Plan</i></p>	<p>The application will be supported by a Flood Risk Assessment which will include a drainage strategy with sustainable drainage measures. This policy criteria seems to be a duplication of national standards and criteria 8 of this policy. We request policy criteria 9 is deleted.</p>
<p>10. <i>Include an assessment and evaluation of the site’s archeological potential and the implementation of any mitigation measures identified through the assessment.</i></p>	<p>Support.</p>

Q68. 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)?

- 3.28 The Interim Sustainability Appraisal (SA) provides an assessment of the proposed options for growth, including the sites identified for allocation. The SA scores the proposed allocations against the objectives of the emerging Local Plan, with reference to SA indicators for more specific assessment under each objective.
- 3.29 We make the following general observations on the assessment methodology, where it relates to matters than be addressed through detailed design. We urge the Council to consider revising the assessment methodology to ensure that suitable sites are not prematurely discounted given the considerable need for housing in the district.
- 3.30 The table below provides out assessment of Site SD11 with reference to the sustainability indicators and assessment criteria.

Indicators	SI Response	Our Response
SA1 – Air Pollution		
1a		No comment
SA2 Biodiversity		
2a		No Comment
2b		It is demonstrated that Ancient Woodland adjacent to the site can be appropriately protected in line with Natural England’s Standing Advice. As such the development would not have a minor adverse effect. For the reasons above the methodology for this assessment criteria should be revised
2c		No comment. The TPOs on the western boundary do not fall within the allocation but can be retained and appropriately protected by ensuring development remains outside any root protection zones.
2d		The priority habitat lies adjacent to the site and we have shown that appropriate measures can be incorporated to ensure this habitat is appropriately protected. As such the overall effect will be neutral.
SA3 Climate Change		
3a		No comment
3b		No comment
SA5 Flood Risk		
5a		No comment
5b		The areas of surface water flood risk within the site are very limited. The future development of the site can avoid thee areas and improve the drainage capabilities of the site as part of the drainage design.

5c		No comment
SA6 – Coastal Erosion		
6a		No comment
SA7 Health and Wellbeing		
7a		No comment
7b		No comment
7c		No comment
SA9 Access to Services		
9a		No comment. However, the site is in a sustainable location given its proximity to the settlement and existing services.
SA11 Heritage		
11a		No comment
11b		No comment
SA12 Land and Soil		
12a		No comment
SA14 Water Quality		
14a		No comment
SA15 Parks and Countryside		
15a		The methodology concludes ‘significant adverse effect’ to any development in the National Landscape, however it is clear that the level of effects will vary depending on the characteristics of the site. The development would result in impacts to land within the National Landscape, but this impact would be contained to the site and for the reasons outlined previously, this impact is acceptable on balance with the need to consider sites in protected landscapes. This site cannot be compared to more exposed sites in the National Landscape. We request that the ‘minor negative’ scoring is also given to sites in the National Landscape that could be sensitively developed.
15b		No comment
15c	N/A	
15d		Greenfield land will need to be used to meet local housing need. Therefore this should not be assessed as having a significant adverse effect as this seems to be a disproportionate assessment considering the extent of the housing need.
SA17 Employment		
17a		No comment
17b	N/A	No comment
SA20 Roads and Travel Choice		
20a		No comment
20b	N/A	No comment

Conclusion

- 3.31 This representation has been prepared in response to Rother District Council's Regulation 18 consultation on the Draft Local Plan 2025-2042
- 3.32 The purpose of this representation is to support the strategic growth identified for Sedlescombe and the inclusion of Land north of Brede Lane, Sedlescombe under draft policy WS2.
- 3.33 It is demonstrated in this statement that the site is available and deliverable and all identified constraints can be overcome through well considered and evidence based design. It is also demonstrated that the site is an appropriate option for development in the High Weald National Landscape, given its landscape characteristics and visual and physical association with the Hastings built up area.
- 3.34 In light of RDC's significant housing need, land north of Brede Lane is well placed to deliver a sensitive landscape led residential development opportunity which integrates open space and biodiversity enhancements which makes a modest yet valuable contribution to the delivery of new homes to Sedlescombe with the necessary infrastructure improvements to support it.

Yours faithfully



Victoria Groves
Area Planning Director
Encls.
Landscape and Visual Appraisal
Landscape Vision Document