

Rother District Council
Regulation 18 Consultation

Rurban Estates Limited

SHELAA Ref. SAL0047 and SAL0025 - Land North of Knelle Road, Robertsbridge

MWB/HM/NK/37747

March 2026



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1 INTRODUCTION

1.1 OVERVIEW

- 1.1.1 This representation has been prepared on behalf of Rurban Estates Limited in response to Rother District Council's Regulation 18 consultation on the Draft Local Plan 2025-2042, which runs until 23rd March 2026.
- 1.1.2 Rother District Council ('RDC' or 'the Council') is preparing a new Local Plan to set out a strategy for development across the district for the period to 2042. Once adopted, the new Local Plan will update and replace Rother's Core Strategy (2014) and Development and Site Allocations (2019) Plans.
- 1.1.3 The consultation follows a previous Regulation 18 consultation on the draft Local Plan which took place in April 2024. The consultation sought views on the proposed development strategy, vision and objectives, along with policies on specific topic areas 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.
- 1.1.4 Rurban Estates Limited has an interest in Land at Knelle Road, Robertsbridge ('the site'), which has been promoted in the RDC's Call for Sites and assessed under Housing and Economic Land Availability Assessment (HELAA) reference SAL0047 and SAL0025. The site has not been allocated for development in the draft Local Plan. The focus of this report is therefore to demonstrate that the site is entirely suitable for development and remains available and deliverable, with reference to the emerging spatial strategy which directs a portion of growth to Northern Rother and the settlement of Robertsbridge.
- 1.1.5 In light of RDC's significant housing need, and given its proximity to the A21 transportation corridor, the Land at Knelle Road, Robertsbridge is well placed to deliver a cohesive and landscape-led residential development in the National Landscape which integrates open space and biodiversity enhancements whilst making a valuable contribution to the delivery of high-quality new homes.

1.2 PLANNING POLICY FRAMEWORK

- 1.2.1 **Paragraph 15** states that the planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings.
- 1.2.2 **Paragraph 16** sets out that plans should: -
- (a) be prepared with the objective of contributing to the achievement of sustainable development;
 - (b) be prepared positively in a way that is aspirational but deliverable;
 - (c) be shaped by early, proportionate, and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
 - (d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

- (e) be accessible through the use of digital tools to assist public involvement and policy presentation; and
- (f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in the NPPF where relevant).

1.2.3 **Paragraph 26** states that effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy.

1.2.4 In line with **Paragraph 36** for Plans to be found 'sound' final draft plans must be:

Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

Effective – deliverable over the Plan Period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

1.3 STRUCTURE OF THE REPRESENTATION

1.3.1 **Section 1** of this report is an introduction to the plan context.

1.3.2 **Section 2** responds to the draft consultation questions.

1.3.3 **Section 3** of this report introduces the site and its surrounding and explains why we consider it is a suitable location for planned growth, with reference to additional evidence available from the emerging applications.

1.3.4 **Section 4** concludes the report and sets out why the site should be allocated within the draft local plan.

1.4 SUPPORTING DOCUMENTS

1.4.1 This representation should be read in conjunction with the following submitted documents:

- Education Impact Assessment (**Appendix 1**)
- Letter on behalf of the owners of 'Russetts' (**Appendix 2**)
- Plans (**Appendix 3**):
 - 796_SK01_Constraints and Opportunities Plan (Option 1)
 - 796_SK02_Illustrative Masterplan (Option 1)
 - 796_SK03_Constraints and Opportunities Plan (Option 2)

- 796_SK04_Illustrative Masterplan (Option 2)
- Transport Technical Note (**Appendix 4**)
- Transport Technical Note Addendum (**Appendix 5**)

2 RESPONSE TO CONSULTATION

2.1 OVERVIEW

- 2.1.1 This section provides a response to the consultation questions contained within the Consultation Document where they are of relevance to our client's interests.

2.2 RESPONSE TO QUESTIONS

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

- 2.2.1 We have no specific comments to make on the amendments made; however, we note that Spatial Objective 4 recognises the need to respond to the housing crisis and help facilitate the delivery of housing to meet the needs to different groups. This will be achieved by maximising the potential opportunities for residential development in sustainable and deliverable locations. We strongly support this objective, and it is encouraging that the Council specifically acknowledge the housing situation as a crisis.
- 2.2.2 As outlined within the consultation document, there is a need to identify enough sites to deliver a minimum of 912 homes per year. This target is not an arbitrary Government top-down target and instead is based on the Government's standard methodology and directly corresponds to the district's established population, affordability, and future needs. Accordingly, creating a place where the range of housing needs are being met in full, and improved, should be clearly explained to be a minimum requirement – it is the way it is achieved that should be subject to more open questions to the public.
- 2.2.3 We would suggest some minor modification to Spatial Objective 4 to clarify that the plan is positively prepared and fully aligned with the provisions of the NPPF to make it clear that the plan as a minimum, seeks to meet the area's objectively assessed needs:
- "Respond to the housing crisis and help facilitate the delivery of housing to meet the needs of different groups in the community in full [...]"*
- 2.2.4 We are supportive of Spatial Objective 7 which seeks to focus growth in sustainable locations, or places that can be made sustainable through supporting infrastructure and community facilities. We suggest that this policy is updated to include specific reference to Northern Rother and opportunities for sustainable growth in villages. There is currently no reference to Northern Rother in the spatial objectives.

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?

- 2.2.5 The Council's housing supply components are consolidated in the table below. It is noted that the categories of supply have been revised since the 2024 consultation which make it clearer how sources of supply have been factored into the overall calculations. It is also noted that the number of homes identified as new and updated draft allocations has increased considerably since the April 2024 consultation, rising from 2,129 homes to 5,051 new homes. This brings the total housing figure for the Plan period accounting for all sources of supply to 8,427 homes over the 17-year Plan period, equating to a target of 495 homes annually.

SOURCE OF HOUSING SUPPLY	2026
Completions	To be included from 1 st April 2026
Committed Sites – Planning permissions (including resolutions to grant), permitted site allocations, permitted large windfall (non-allocated sites for 5 + dwellings), prior approval for 5 + dwellings, existing site allocations without planning consent	2,830
Windfall Sites – Small site allowance of 39 units annually, starting Year 4 of plan period	546
New / Updated Allocations – Existing site allocations without planning consent with revised capacity (residual figure), new site allocations without planning consent (as of 1 st April 2025).	5,051
Unmet need accommodated outside of Rother	0

- 2.2.6 This is recognised to be a considerable increase in potential housing supply when compared to the adopted Core Strategy figure (355 homes per year), which our client welcomes. 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.
- 2.2.7 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.
- 2.2.8 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.
- 2.2.9 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.
- 2.2.10 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.
- 2.2.11 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.
- 2.2.12 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.

- 2.2.13 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.
- 2.2.14 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.
- 2.2.15 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 the public interest. In this 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.
- 2.2.16 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).
- 2.2.1 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 LPAs should "*continue to collaborate across their boundaries, including on unmet development needs from neighbouring areas,*"
- 2.2.2 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.
- 2.2.3 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.
- 2.2.4 On account of all of the above, we strongly support our client's allocation, 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.

Q6 - Do you have any comments on the Council's assessment of the additional Development Strategy options?

- 2.2.5 We support RDC's approach and justification with regards to the A21 corridor and opportunities for growth. Notwithstanding any future upgrades to the strategic road network, it is clear that the A21 corridor is an appropriate and sustainable option for growth as the main vehicular corridor through the district, with connections to the coastal settlements and the national highway network (the M20 and M25) beyond Royal Tunbridge Wells and Maidstone.
- 2.2.6 We support the inclusion of Robertsbridge as a focus area for growth within this spatial development option.

Q7 - Do you have any comments on the preferred approach for housing density shown in Figure 9, or on the updated Density Study (2026)?

- 2.2.7 The NPPF states that "*where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site*" (emphasis added). While there should be greater emphasis on efficient use of land in the district, this must not compromise the need to deliver context-appropriate development or development that responds to local market demands.
- 2.2.8 The 2024 consultation sought to divide Rother into five area types, each tailored with density expectations as defined by the Density Study (2024). Since the 2024 consultation, RDC has further examined whether these density expectations are appropriate, having regard to the need to optimise the use of land and maximise housing delivery, with reference to an updated Density Study (2026). Within this context, the 2026 consultation presents three options (Options A-C) for housing density, framed as:
- a) Option A - 'Business as Usual' - reflects density levels based on the adopted Development and Site Allocation Local Plan.
 - b) Option B - 'Higher Density' - higher density with a significant uplift in development density (compared to the baseline). Live Well Locally areas are given a density of 40dph, comprising 'low-rise development at the mid-range of medium density, located on the urban edge.'
 - c) Option C - 'Higher Density Plus' - higher density with a significant uplift in development density (compared to the baseline). Live Well Locally areas are given a density of 50dph, comprising 'low-rise development at the higher range of medium density, located on the urban edge.'
- 2.2.9 The proposed density range of 25-45 dwellings per hectare for the villages with development boundaries (such as Robertsbridge) set out in the 2024 consultation is consistent with the findings of the Density Study (2026). The Density Study includes four village examples which are considered by the Council to show how this density range can be delivered whilst retaining a clear settlement structure, usable private amenity and a landscape-led approach. It is stated that heights should be used as a tool rather than a blanket approach: typically 2 storeys with occasional 2.5-3 stories.

- 2.2.10 Whilst we support the proposed density for villages with development boundaries, the policy wording should not be overly prescriptive to ensure that individual site characteristics are appropriately considered, particularly those located in the National Landscape. It is recognised that there will be opportunities where higher densities will be appropriate but equally it can be necessary to incorporate lower densities at settlement edges to provide a sensitive transition to the open countryside beyond. Further, a prescriptive density to all sites doesn't necessarily provide an appropriate range of homes to meet market demand, including family sized properties.

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

- 2.2.11 Our client is 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.
- 2.2.12 The NPPF states that major development should only be permitted in National Landscapes in exceptional circumstances, and where it can be demonstrated that the development is in the 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.
- 2.2.13 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 upon 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.
- 2.2.14 With reference to our response to Question 1, Question 63, and Question 68, 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 in locations that are influenced to a degree by existing settlements. However, in light of the considerable undersupply of housing land and the scrutiny placed on other councils at Examination concerning the site assessment process, we raise significant concerns that additional sites within the National Landscape have been prematurely discounted and we urge the council to reconsider these sites in light of the additional evidence provided as a response to this consultation. This review should be focused on settlements identified within the spatial strategy and solutions must be sought to overcome identified constraints wherever possible. The Council must be proactive in engaging with landowners in this regard.
- 2.2.15 For the reasons set out in relation to Question 2, we have residual concerns that it is not a sufficiently ambitious strategy that will be effective in delivering a positively prepared plan. We do question the validity of the Interim Sustainability Appraisal Report (January 2026) which scores the proposed development strategy the highest score '++' against objective 8 for the delivery of homes. This appears generous given the proposed strategy would deliver just 52% of the housing need.
- 2.2.16 By way of remedy and to ensure the safe passage of the Plan through examination, we would strongly suggest that the development strategy is revisited to further emphasise the intensification of existing urban opportunities and expand the scope for development

within the National Landscapes which is inevitably going to be required if RDC are to more closely align with the standard method local housing need.

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

- 2.2.17 We are supportive of the overall strategy of allocating a portion of homes to Northern Rother. However, we repeat our concerns set out in response to Question 2 and Question 8 about the undersupply of housing land in the draft Local Plan and the substantial need to reassess discounted sites and a further consideration of whether the identified constraints can be overcome through further assessment and appropriate design.
- 2.2.18 As addressed throughout this representation, it is clear there are additional opportunities for growth in Northern Rother, in recognition of the planned growth and the relative sustainability of settlements in this part of the district.

Q14 - 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?

- 2.2.19 We support the general aims of the Vision and development strategy for Northern Rother, which recognises the need for rural settlements and communities to benefit from plan-led growth, through sensitive residential development and growth in villages.
- 2.2.20 The consultation confirms that Robertsbridge has the highest settlement growth figure within the Northern Rother sub-area. This reflects the fact that Robertsbridge is the largest and most sustainable settlement within the sub-area, containing a primary and secondary school and a train station on the Hastings to London line. The majority of proposed residential allocations come from new sites identified through the HELAA, although some sites form extensions to existing Neighbourhood Plan allocations.
- 2.2.21 We support the long-term ambitions for greater delivery upon completion of improvement to the A21 corridor, however as recognised with the Local Plan, such works fall outside either the scope or timeframe of the Local Plan and cannot be relied upon as a source of growth within the Plan period.
- 2.2.22 It must therefore be ensured upon submission of the Plan that the housing allocations proposed within this Plan period can be accommodated prior to the A21 upgrades, to ensure much-needed housing delivery is not delayed further in rural areas until a subsequent Plan review.

Q63 - Do you consider that there are any other possible sites in the Northern Rother sub-area (which includes the parishes of Bodiam, Burwash, Etchingam, Ewhurst, Hurst Green, Salehurst and Robertsbridge and Ticehurst) which should be allocated for development in the Local Plan?

- 2.2.23 Yes. In light of the considerable and demonstrable need for housing in the district, and the recognised shortfall in housing land, it is vital that RDC explores whether it can accommodate additional homes on sites that align with the proposed spatial strategy set out in the draft Local Plan, but may have been excluded at the assessment stage due to lack of evidence to address the identified constraints.
- 2.2.24 This representation seeks to promote the inclusion of land north of Knelle Road, Robertsbridge (Site Reference SAL0025 and SAL0047). A full assessment of the site is contained in **Section 3** of this report, with reference to relevant technical studies and

illustrative plans. However by way of response to Question 63, the key headlines are summarised below:

- The allocation of the site would be in clear alignment with the planned pattern of growth for Rother. The draft Local Plan recognises the need for rural settlements and communities to benefit from plan-led growth, through sensitive residential development and growth in and around villages. Despite their size, comparative to settlements higher in the spatial strategy, villages such as Robertsbridge are well-connected to the rest of the district and region via the train station which offers regular services to and between Hastings and London.
- The submitted Landscape and Visual Appraisal demonstrates that landscape-led development could be accommodated on the site without unacceptable impacts on local landscape character and the wider High Weald National Landscape. The site is in very close proximity to Robertsbridge and its development would be in-keeping with the linear settlement pattern in the western side of the village. The site benefits from clear natural boundaries along much of the perimeter which would help visually and physically contain the development from the ridgeline further north.
- The site is sustainably located (as acknowledged by the SA – see response to Question 68 below) which would facilitate travel via alternative means of transport than the private car. Of particular note is the neighbouring Robertsbridge Community College which has a catchment that covers 75% of the planned housing for North Rother. The proximity of the site would enable students living on the site to walk or cycle to school, which is a considerable benefit for those living in more rural parts of the district. As noted in paragraph 6.86 of the consultation document, Northern Rother experiences issues which are typical of rural communities, where some areas are isolated from services and facilities, and therefore there is a higher dependency on the private car for travel.
- There are no other identified constraints that cannot be overcome through further assessment at application stage and sensitive design.

2.2.25 This representation is also accompanied by an Education Impact Assessment prepared by Alfredson York (see **Appendix 1**). The report demonstrates that the development of this site would not result in any short term capacity issues for Early Years, Primary or Secondary education in the local area. It is demonstrated that there is currently a surplus in space both now and using ESCC forecasts for the period up to 2028/2029. It is noted that ESCC, in their consultation response to this Local Plan consultation, dated 18 March 2026, highlight the fact that a number of rural primary schools are operating under capacity. ESCC therefore welcomes reference to appropriate growth in these villages as an important factor in securing the long-term viability of these schools and communities. It is therefore even more important, to secure the ongoing viability of the village primary schools, that every suitable opportunity to provide housing in Robertsbridge is taken.

2.2.26 Notwithstanding the above, the development of this site could facilitate the expansion of soft outdoor PE space for Robertsbridge Community College, which currently falls below the minimum requirement for a school of this size. If required in the future, it could also allow for an expansion of the College by 1FE which would require 0.89ha of additional land. This is discussed further in the two options presented for the site in Section 3.

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)?

2.2.27 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.

2.2.28 The following scoring metric is used in the assessment of these indicators:

++	Significant Positive
+	Minor Positive
0	Neutral or Uncertain
-	Minor Negative
--	Significant Negative

2.2.29 We make the following general observations on the assessment methodology, where it relates to matters that can 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.

- **2b** scores any site within Ancient Woodland as having a 'significant adverse' effect. This disproportionately affects the assessment of sites that can suitably accommodate the required ancient woodland buffer within a development proposal. Similar comments can be made on **2d** which refers to priority habitat.
- **2c** scores any site with a TPO as 'minor negative'. The development of a site can avoid any impacts on trees with a TPO.
- **5b** scores any site with land at high risk of surface water flooding as having a 'significant adverse' effect. As above, it is possible design around, and in many cases improve, this risk through technical drainage design. Similar comments can be made on **5c** which refers to ground water risk.

2.2.30 The table below provides our assessment of Site Reference SAL0025 and SAL0047 with reference to the sustainability indicators and assessment criteria. It is noted that Robertsbridge Site Allocation RB6(a) scores the same against all indicators other than landscape sensitivity in the National Landscape, where impacts are identified as 'medium' rather than 'high'. Against several indicators, Site Reference SAL0025 and SAL0047 score more favourably than Site Allocation RBb(a), namely:

- Heritage – there is a Grade II listed building in the site.
- Priority Habitat – the site lies in an Archaeological Notification Area.
- Flood Risk – a portion of the site is in Flood Zone 2 and 3, with areas of surface water flood risk.

2.2.31 While these scores would not preclude the development of Site Allocation RB6(a), it is clear that Site Reference SAL0025 and SAL0047 score comparably to allocated sites within Robertsbridge. The site also scores similarly to Robertsbridge Site Allocation RB1, RB3, RB4 with the most notable difference being landscape sensitivity. The landscape evidence submitted with this representation demonstrates that landscape sensitivity would not be 'high' as assessed in the SA.

2.2.32 Please also refer to Question 8 for our comments on the scoring for the proposed development strategy.

	SAL0025		SAL0047	
	SI ASSESSMENT	OUR ASSESSMENT	SI ASSESSMENT	OUR ASSESSMENT
SA1 - Air Pollution				
1a		Support.		Support
SA2 - Biodiversity				
2a		No comment.		No comment.
2b		No comment.		It is demonstrated that Ancient Woodland adjacent to SAL0047 can be retained and sensitively designed into the proposal in line with Natural England's Standing Advice. As such the development would not have a 'significant negative' effect. For the reasons above the methodology for this assessment criteria should be revised.
2c		No comment.		No comment.
2d		No comment.		Priority habitat adjacent to the site (namely the eastern end of Fair Ridge Wood) will be retained and the Ancient Woodland buffer will ensure no adverse effects.
SA3 - Climate Change				
3a		No comment.		
3b		Support.		Support.
SA5 - Flood Risk				
5a		No comment.		The developable areas of the site in Flood Zone 1. This assessment disproportionately affects the view of the whole site.
5b		Support.		The developable areas of the site are not at risk of surface water flooding now or in the 1 in 30, 1 in 100 or 1 in 1000 scenarios.
5c		Support.		Support.
SA6 - Coastal Erosion				
6a		N/A		N/A

	SAL0025		SAL0047	
	SI ASSESSMENT	OUR ASSESSMENT	SI ASSESSMENT	OUR ASSESSMENT
SA7 - Health and Wellbeing				
7a		Support.		Support.
7b		Support.		Support.
7c		Support.		Support.
SA9 - Access to Services				
9a		Support.		Support.
SA11 - Heritage				
11a		No comment.		There are no designated heritage assets within or adjacent to the site.
11b		No comment.		No comment
SA12 - Land and Soil				
12a		The site primarily comprises Grade 3 agricultural land, with some Grade 4 agricultural land on its eastern end. Note that much of the land around Robertsbridge is Grade 3.		As per SAL0025.
SA14 - Water Quality				
14a		No comment.		No comment.
SA15 - Parks and Countryside				
15a		In reflection of our comments on the assessment methodology, 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 less suitable sites in the National Landscape.		As per SAL0025.
15b		As above.		As above.
15c		N/A		N/A
15d		Greenfield land will need to be used to		As per SAL0025.

	SAL0025		SAL0047	
	SI ASSESSMENT	OUR ASSESSMENT	SI ASSESSMENT	OUR ASSESSMENT
		meet local housing needs.		
SA17 - Employment				
17a		No comment.		No comment.
17b		N/A		N/A.
SA20 - Roads and Travel Choice				
20a		Support.		Support.
20b		N/A		N/A

3 DELIVERABILITY OF LAND NORTH OF KNELLE ROAD, ROBERTSBRIDGE

3.1 OVERVIEW

- 3.1.1 This representation reflects our client's aspirations to develop 'Land North of Knelle Road, Robertsbridge'. The site was assessed as Site References SAL0047 and SAL0025 in RDC's HELAA; however, it should be noted that the owner of the residential property adjacent to SAL0025 – Russetts – has confirmed their willingness for their land to form part of the wider assembly. This property sits adjacent to the site access and can therefore be utilised as part of the proposed access design. A letter to this effect is contained at **Appendix 2**. The two assessed site parcels, plus the 'Russetts' property, are shown in **Figure 3.1** below.
- 3.1.2 Copies of the indicative plans for the site are contained at **Appendix 3** and have been prepared in reflection of the Opportunities and Constraints Plans provided. Two options are put forward for consideration:
- **Option 1** – In the region of 142 homes based on graduated density of 30-35dph across 4.16 hectares of net developable area; or
 - **Option 2** – In the region of 113 homes based on a graduated density of 30-35dph across 3.34 hectares of net developable area, plus 1 hectare of land being safeguarded for the extension of Robertsbridge Community College and/or complimenting educational use.
- 3.1.3 Both options would result in a landscape-led and context appropriate addition to Robertsbridge, set within the strong landscape framework that encloses the site with the settlement and adjacent land uses. The eastern part of the site lends itself to a meaningful area of open space, with outward views towards the wider High Weald National Landscape.

3.2 SITE LOCATION AND DESCRIPTION

- 3.2.1 The site comprises an 11.88-hectare area of land lying immediately to the north of the settlement of Robertsbridge. It sits to the rear of Robertsbridge Community College and the private gardens of dwellings along Langham Road, Knelle Road and Bellhurst Road, as outlined in red in **Figure 2.1** below.
- 3.2.2 The site is made up of four distinct field parcels, set out in an east-west linear orientation, similar to the form of the western part of the village. The parcels sit just south of the crown of a localised ridge line, with the topography dropping down on the west and south. Despite this local topography, the field parcels are predominantly separated with treelines and hedgerows which offer a strong sense of containment from both within the site and from adjacent land.
- 3.2.3 The site is bounded to the south by Robertsbridge Community College and its playing fields to the west; private gardens of the dwellings on Knelle Road, Langham Road and Bellhurst Road; and a small area of woodland adjacent to Bugsell Lane. The eastern boundary abuts the railway line and the western boundary of the site sits adjacent to Bugsell Lane. To the north is a well established line of trees and hedgerow which contains the site from the more open countryside beyond.



FIGURE 3.1: SITE AERIAL SHOWING SURROUNDING CONTEXT (BASE MAP SOURCE: GOOGLE)

3.3 ACCESS

- 3.3.1 An existing access point into the site is available from the northern end of Knelle Road, where a field gate is found, leading into SAL0025.
- 3.3.2 Two options are available for the site access design. The previous Call for Sites submission was accompanied by an access design which proposed to upgrade the existing agricultural access off Knelle Road using land within the extent of the adopted highway and the Russetts property.
- 3.3.3 Knelle Road would be reprioritised, with priority given to the development and a new priority junction formed to serve Robertsbridge Community College. Knelle Road would be widened to 5.5m at its junction with Langham Road before narrowing to 3.7m, with a priority working system implemented in favour of northbound traffic. This would allow for the retention of the existing footway width and on-street parking bays in this area. The carriageway would then widen again to 5.5m to the north of this feature and route into the site. This is shown in the Technical Note contained at **Appendix 4**.
- 3.3.4 Since the original submission, an additional access plan has been completed in support of the development, demonstrating an alternative access arrangement which includes land in the ownership of East Sussex County Council (ESCC) in lieu of the property named 'Russetts'. While the owners of the Russetts property remain agreeable to the principle of their ownership being included as part of the promoted land to facilitate an appropriate access, this second option demonstrates an alternative arrangement which is also considered deliverable subject to agreement with ESCC. This is set out within the Addendum Technical Note contained at **Appendix 5**.
- 3.3.5 The land in the control of Rurban Estates has a unique relationship with Robertsbridge Community College. There is the potential to safeguard some of the adjacent land in favour of ESCC for educational expansion as part of any negotiations regarding any future rearrangement of the current accesses.
- 3.3.6 It is proposed that a secondary access point is developed from Bugsell Lane into the site, however this will be for emergency access use only.
- 3.3.7 The Technical Note has assessed potential trip generation based on the capacity of the site. The assessment concludes that the impact of the proposed development on the local highway network is not expected to be 'severe'. Any future planning application would

include the submission of a more robust Transport Assessment and Travel Plan, to ensure the impacts of the proposed development are appropriately assessed.

Accessibility

- 3.3.8 Knelle Road is the principal route to Robertsbridge Community College. The road leads to Brightling Road approximately 240m to the south of the site, which is the principal route through Robertsbridge, connecting the site to the village centre and the railway station. Brightling Road, further extends to Robertsbridge Bypass (A21), approximately 0.65 miles from the access point of the site. The A21 connects the site to Hastings to the south, other local communities, and to the national highway network via Tunbridge Wells (M25) and Maidstone (M20).
- 3.3.9 Surfaced pavements are found along surrounding roads, including those leading to central Robertsbridge. This provides connection, through an 11-minute walk, to Robertsbridge Railway station, providing regular services to Hastings and London Charing Cross. Further, two bus stops are located nearby. To the east, The George bus stop is found 14 minutes to the east, providing regular services to Hawkhurst and Hastings. To the west, Hackwood bus stop is located a 16-minute walk from the site, connecting the site to Battle.
- 3.3.10 The Technical Note concludes that the local sustainable transport infrastructure affords the opportunity for many everyday journeys to be carried out using sustainable and active travel modes.

3.4 POLICY DESIGNATIONS AND SITE-SPECIFIC CONSIDERATIONS

Heritage

- 3.4.1 There are no heritage assets located within or directly adjacent to the site. The nearest Listed Buildings are Grade II Listed Peans Farmhouse (ref. 1217710) approximately 230m to the southwest of the site, and Grade II Listed The Ostrich Hotel (ref. 1275085) approximately 400m to the southeast of the site.
- 3.4.2 Robertsbridge is historic in character with a significant number of listed features and buildings along the High Street, within the Robertsbridge & Northbridge Street Conservation Area. The site is approximately 0.4 miles west of the cluster of historic designations in this area.
- 3.4.3 Given the substantial intervening vegetation and built form between the site and the nearest heritage assets, heritage impact would not be a constraint to development.
- 3.4.4 The site does not fall within an Archaeological Notification Area (ANA) as defined by the East Sussex County Council map for ANAs in East Sussex and Brighton & Hove.

Flood Risk/Drainage

- 3.4.5 The Environment Agency's Flood Map for Planning shows the site within Flood Zone 1, which means that the site is at low risk of flooding from nearby rivers and the sea.
- 3.4.6 The map further indicates that there is no risk of surface water flooding in the 1 in 30, 1 in 100 and 1 in 1000-year scenario, other than a strip of risk that appears to follow a field drain just on the edge of the north eastern boundary.
- 3.4.7 Any forthcoming application for the site would include a Flood Risk Assessment and Drainage Strategy.

Environmental Designations

Landscape

- 3.4.8 The site is located on the northern edge of Robertsbridge, in an area characterised by both rural landscape and development along Brightling Road and Langham Road. The key landscape features within the site are found along the boundaries in the form of trees and hedgerows. The majority of the site is characterised by open grassland.
- 3.4.9 The site falls entirely within the High Weald National Landscape, a designation which covers 83% of the district. A landscape appraisal has been carried out by LDA Design and accompanies this representation to assess the baseline characteristics of the site within this designated context and to determine the capacity of the site for future development. It concludes that while the development of the site would result in inevitable changes to the landscape character and views to the site, as within any greenfield land, the site could accommodate landscape-led residential development provided that appropriate mitigation and enhancement measures are incorporated in the design.
- 3.4.10 The key observations from the appraisal are outlined below:
- The existing development in Robertsbridge does not sit on the ridge top, instead it steps down with the southern and eastern slopes. The development would be consistent with this existing settlement pattern. Development on the western plot and eastern plot have been moved southwards and northwards respectively, to further reflect the existing settlement pattern.
 - Views from the south are considered to be experienced in the context of the southern existing development, meaning that the development would be read alongside the existing housing.
 - There is opportunity for the development to positively front towards the school, which would enable the facility to act as a focal point within the scheme. Active frontages to the school would strengthen the integration with the existing settlement. To promote this active frontage, the access route for both options is proposed to be positioned to the north of the residential parcel, with open space immediately adjacent to the school's boundary where possible.
 - Boundary vegetation is mature, which contributes positively to the site's landscape framework. The internal field boundaries and weaker stretches of external hedgerow would be enhanced wherever possible to reinforce the wider landscape structure.
 - The northeastern parcel provides ecological opportunity, through the enhancement of the existing vegetation on the parcel. This area will be maintained for greenspace, including some sustainable drainage features. This would offer opportunities for recreation and outward views.
- 3.4.11 The appraisal demonstrates that despite the site's location in the National Landscape, there are opportunities to incorporate the development effectively into the landscape and the existing settlement. A full Landscape and Visual Appraisal would be carried out alongside any forthcoming planning application to demonstrate that a more detailed scheme is appropriate for its immediate setting. This would provide a robust analysis of the visual impact of development on the site, providing effective mitigative measures against any perceived harm.

Trees and Ecology

- 3.4.12 The southeastern boundary lies adjacent to a small area of woodland, which is designated as Ancient Woodland as well as Priority Habitat (Deciduous Woodland). The submitted Illustrative Masterplan demonstrates how a development can be sensitively designed to accommodate the requisite 15m buffer zone in this area, in line with Natural England's Standing Advice, which would also act as a buffer for the Priority Habitat.
- 3.4.13 The development would achieve Biodiversity Net Gain through on-site enhancements as a priority, with off-site enhancements used for any residual loss and gains.
- 3.4.14 There are no Tree Preservation Orders (TPO) covering trees within or adjacent to the site.

Amenity

- 3.4.15 A key consideration to residential development would be potential impact on the dwellings along the southern and western boundary of the site. Due to the rear gardens backing onto the site, and existing vegetated boundary features, there are no concerns over the potential for overlooking, loss of privacy or impacts on daylight/sunlight. The approach to development in the western field would carefully consider the relationship with the dwelling fronting onto Bugsell Lane.
- 3.4.16 The railway line parallel to the eastern boundary of the site would be separated from the housing parcels by a considerable area of open space (approximately 300m). As such there are no expected issues with regards to the impact of railway noise on residential amenity.

3.5 AVAILABILITY AND ACHIEVABILITY

- 3.5.1 Rurban Estates Ltd controls the entire site and has been actively promoting the site through the Local Plan process. There are no known viability issues, legal or third-party constraints present and there are no impediments to the site being allocated for development commencing early within the Plan period.
- 3.5.2 There are no physical limitations or problems such as access, infrastructure, flood risk, hazardous risks, pollution or contamination.
- 3.5.3 Availability is essentially about confirming that a site has been made available for development by the landowners, and that it is financially viable to develop. On behalf of our client, we can confirm that there are no unexpected financial restrictions that would impact upon the viability of a housing scheme or that would prohibit development coming through within the early stages of the plan period. To the contrary, we consider there to be opportunity to deliver a high quality residential development.
- 3.5.4 The site is controlled by our client, a strategic land promoter, and is in single ownership. There are no complicated legal agreements or covenants that would prohibit the ability to bring forward the site early in the plan period.

4 CONCLUSION

- 4.1.1 This representation has been prepared on behalf of Rurban Estates Limited in response to Rother District Council's Regulation 18 consultation on the Draft Local Plan 2025-2042.
- 4.1.2 Our client is 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 consultation document, even with the identified site allocations and the potential need to accommodate some of the unmet needs of neighbouring districts.
- 4.1.3 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 in locations that are influenced to a degree by existing settlement. However, in light of the considerable undersupply of housing land and the scrutiny placed on other councils at Examination concerning the site assessment process, we raise significant concerns that additional sites within the National Landscape have been prematurely discounted and we urge the council to reconsider the site in light of the additional evidence provided as a response to this consultation. This review should be focused on settlements identified within the spatial strategy and solutions must be sought to overcome identified constraints wherever possible. The Council must be proactive in engaging with landowners in this regard.
- 4.1.4 Within this context, we seek to promote the inclusion of Land at Knelle Road (HELAA reference SAL0047 and SAL0025) for residential development in Robertsbridge. The site has not been allocated for development in the draft Local Plan, but scores comparably in many respects to the draft allocations elsewhere in the settlement.
- 4.1.5 The site has the capacity to deliver one of two development options. The first option would accommodate approximately 142 homes based on graduated density of 30-35dph across 4.16 hectares of net developable area. The second option would accommodate approximately 113 homes based on a graduated density of 30-35dph across 3.34 hectares of net developable area. This option would also include 1 hectare of land being safeguarded for the extension of Robertsbridge Community College and/or complimenting educational use.
- 4.1.6 This representation has therefore demonstrated that the site is entirely suitable for development and remains available and deliverable.

APPENDIX

1





ALFREDSON YORK
ASSOCIATES

Land at Knelle Road, Robertsbridge
Education Impact Assessment and
Regulation 18 Representations
on behalf of Rurban Estates

19th March 2026

Report **v1-1** prepared by **John Powell**
for

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1. Introduction

1.1. Report Purpose & Scope

1.1.1. I have been asked to consider the development for its likely impact on social infrastructure in the local area.

1.1.2. The purpose of this report is to act as a principal point of reference for discussions regarding the allocation of, and planning benefits arising from, this site in the forthcoming Local Plan and the mitigation that might be required. This initial report includes an analysis of the request for contributions pertaining to local school places against the prescribed tests for such contributions.

1.1.3. It is acknowledged that if the impacts of the development legitimately call for a S106 contribution due to capacity problems, which meet the requirements of the Community Infrastructure Levy (CIL) regulations, then it is accepted that a contribution should be offered.

1.2. Intended Audience

1.2.1. The intended audience is the Client, and this report is private and confidential, and its contents may not be shared without permission.

1.3. Research Sources

1.3.1. The contents of this initial report are based on publicly available information, including relevant data from central government and the local authority and on information obtained through requests under the Freedom of Information Act. Research for this report was conducted in March 2026.

1.4. Community Infrastructure Levy Regulations

- 1.4.1. The Community Infrastructure Levy (“the levy”) Regulations came into force in April 2010. The levy is intended to provide infrastructure to support the development of an area rather than to make individual planning applications acceptable in planning terms. As a result, there may still be some site-specific impact mitigation requirements without which a development should not be granted planning permission.
- 1.4.2. However, in order to ensure that planning obligations and the levy can operate in a complementary way and the purposes of the two regimes are clarified, the regulations scale back the way planning obligations operate. Limitations are placed on the use of planning obligations in three respects.
- 1.4.3. The first of these, which is the relevant consideration in this matter, is putting the Government’s policy tests on the use of planning obligations set out in Circular 5/05 Planning Obligations on a statutory basis for developments which are capable of being charged the levy.
- 1.4.4. The regulations place into law for the first time the Government’s policy tests on the use of planning obligations. The statutory tests are intended to clarify the purpose of planning obligations in light of the levy and provide a stronger basis to dispute planning obligations policies, or practice, which breach these criteria. This seeks to reinforce the purpose of planning obligations in seeking only essential contributions to allow the granting of planning permission, rather than more general contributions which are better suited to use of the levy.
- 1.4.5. From 6 April 2010 it has been unlawful for a planning obligation to be required as a material consideration in order for a planning authority to lawfully grant permission when determining a planning application for a development, or any part of a development, that is capable of being charged the levy, whether there is a local levy in operation or not, if the obligation does not meet all of the following tests:
- (a) Necessary to make the development acceptable in planning terms;
 - (b) Directly related to the development; and
 - (c) Fairly and reasonably related in scale and kind to the development.
- 1.4.6. From 1st September 2019, revised regulations came into force. Amongst other things this introduces a requirement on CIL charging authorities to produce an annual statement regarding sums received both through CIL and planning obligations.
- 1.4.7. These regulations also remove the limit of pooling no more than 5 planning obligations towards one item of infrastructure, which has been a particular issue with regards to the provision of education infrastructure.

2. Regulatory Framework

2.1. Department for Education Guidance on Planning Obligations

2.1.1. In April 2019, the Department for Education (DfE) published “Securing developer contributions for education”, non-statutory guidance for local authorities regarding seeking planning obligations towards education provision from residential development. The latest version of this guidance, from August 2023, is attached at Appendix AYA01.

2.1.2. Whilst this is non-statutory, it is important to consider elements of this guidance, as they would carry some weight in a planning context, although this clearly does not supersede or outweigh the CIL regulations as outlined above.

2.1.3. The purpose of the guidance is underpinned by four principles, as set out below:

- Housing development should mitigate its impact on community infrastructure, including schools;
- Pupil yield factors should be based on up-to-date evidence from recent housing developments;
- Developer contributions towards new school places should provide both funding for construction and land where applicable, subject to viability assessment when strategic plans are prepared and using up-to-date cost information;
- The early delivery of new schools within strategic developments should be supported where it would not undermine the viability of the school, or of existing schools in the area.

2.1.4. The fourth of these principles is of particular relevance to this report.

2.1.5. The guidance also states, with regards to costs per pupil place, the following:

32. We advise that you base the assumed cost of mainstream school places on the relevant average regional costs published in the DfE school places scorecard.¹⁰ This allows you to differentiate between the average per pupil costs of a new school, permanent expansion or temporary expansion, ensuring developer contributions are fairly and reasonably related in scale and kind to the development. You should adjust the regional average to account for inflation since the latest scorecard base date.¹¹

2.1.6. However, it should be noted that nothing within this non-statutory guidance supersedes the tests set out at paragraph 1.4.5 above.

2.2. School Admissions Code 2021

2.2.1. The current relevant School Admissions Code took effect from September 2021 and begins by setting out its statutory basis, as set out below:

The Statutory Basis for the School Admissions Code

1. *The School Admissions Code ('the Code') has been issued under Section 84 of the School Standards and Framework Act 1998 ('SSFA 1998')*¹. *The Code has been made following a consultation under Section 85(2) of the SSFA 1998 and after being laid before Parliament for forty days.*

2. *This Code comes into force on 1 September 2021 and, unless otherwise stated, applies with immediate effect. The Code applies to admissions to all maintained schools in England. It should be read alongside the School Admission Appeals Code and other guidance and law that affect admissions and admission appeals in England.*

3. *This Code imposes mandatory requirements and includes guidelines setting out aims, objectives and other matters in relation to the discharge of functions relating to admissions by the bodies listed below: a) Admission authorities of maintained schools as defined in Section 88(1) (a) and (b) of the SSFA 1998 b) Governing bodies and local authorities (when not admission authorities) c) Schools Adjudicators d) Admission Appeal Panels. These bodies have a statutory duty to act in accordance with the relevant provisions of the Code.*

2.2.2. The Published Admission Number (PAN) for each year group is the minimum number the school must accept in that year group if it has sufficient applicants. The PAN is set for each cohort at the cohort's year of first entry to the school and remains unchanged for the life of the cohort. This is set out in Section 1 of the Code.

Published Admission Number (PAN)

1.2 *As part of determining their admission arrangements, all admission authorities must set an admission number for each 'relevant age group'.*

2.2.3. "Relevant age group" is defined by the Code as being:

... the age group at which pupils are or will normally be admitted to the school e.g. reception, year 7 and year 12 where the school admits external applicants to the sixth form (Section 142 of the SSFA 1998).

2.2.4. This means that any building project to expand a school, whether primary or secondary, can only alter the PAN for the first year of entry after the building project, and cannot alter the PAN for cohorts already within the school.

2.2.5. This position is supported by the appeal decision at Malpas (appeal reference APP/A0665/A/13/2193956 and attached at Appendix AYA02), where the Inspector noted that:

“51. When allocating places at BHHS a priority is given to children living in the catchment and those with siblings already at the school (whether out-of-area or not), while any spare places are made available to others from outside the catchment who apply. As such, in the long-term any children from this site could be accommodated within the existing school, as they would take priority in the allocations process and the number accepted from out-of-area would be reduced accordingly. The contribution’s aim of achieving the permanent increase in capacity for what is not going to be a permanent issue is therefore not justified. It was said that those living elsewhere should have the opportunity to send their children to the school, but there is no reason why that should be so in planning terms.”

2.2.6. In this appeal case, the local secondary school was full, but was full as a result of previous admission year groups admitting a number of pupils from out-of-catchment and out-of-borough. In the long term, as pupils from the appeal site applied in the normal admission round, they would obtain a place, and the out-of-borough pupils would not. The duty to educate those pupils fell to their local education authority.

2.3. Surplus Places

2.3.1. The most up-to-date reference to keeping some surplus places within the local school planning system comes from the National Audit Office's 2013 report on "Capital funding for new school places".

2.3.2. At paragraph 1.16 and 1.17, this document, with my emphasis in bold, states that:

"1.16 The Department compiled its estimate of places required by examining local authorities' forecast data for pupil numbers in 2014/15 and existing capacity in May 2010 in each authority, and, for county councils, for each district within that authority. It then calculated the number of extra places needed to achieve a surplus of places of at least 5 per cent in each authority or district. The Department adopted this planning assumption in the context of a challenging spending review when preparing its funding bid to HM Treasury. It considered that on average 5 per cent was the bare minimum needed for authorities to meet their statutory duty with operational flexibility, while enabling parents to have some choice of schools. As at September 2010, 37 of 152 authorities were forecasting a surplus of primary places of below 5 per cent by 2014/15 without any spending on new places, while another 62 would be in deficit, with fewer primary places than children.

*1.17 The Department's overall framework for supporting the delivery of new school places is not fully aligned with its twin objectives of ensuring that there is a place for each child and some spare capacity to facilitate parental choice. **Local authorities' statutory duty to provide sufficient schools does not require them to maintain surplus capacity for parental choice.** Although the Department issued guidance in June 2009 that it was reasonable for authorities to aim for between 5 and 10 per cent primary surplus to allow them some opportunity to respond to parental choice, it did not subsequently communicate to authorities its September 2010 figure of a minimum of 5 per cent surplus. **This is because this was a planning assumption, rather than a target it expected authorities to meet.** The Department recognises that it needs to undertake work to identify whether its assumption realistically enables parental choice."*

2.3.3. With regards to the seeking of contributions to enable parental preference to be met, this matter has been considered previously in an appeal at Audlem (appeal reference APP/R0660/A/13/2204723 and attached at Appendix AYA03).

2.3.4. The Inspector, at paragraph 122 of his report, stated:

"122. Parental preference may be the responsibility of the Council but not of the appellants company ..."

2.3.5. In this appeal, there were surplus secondary places locally, although the nearest secondary school was full. The local authority sought a full contribution to increase places at the nearest school to accommodate new children without impacting negatively on the existing pattern of parental preference in the area.

2.4. Local Authority Pupil Planning Areas

2.4.1. Attached at Appendix AYA04 is the Department for Education's Guidance on Local Authority Pupil Planning Areas from September 2021.

2.4.2. This document provides guidance for local authorities on how pupil planning areas should be structured.

2.4.3. This Guidance sets out, as a guiding principle, that schools located in close proximity, and which pupils could reasonably attend, should be grouped together in one planning area.

2.4.4. This Guidance also sets out that, when reviewing pupil planning area structures, local authorities should consider the following factors:

- Geographical characteristics
- Parental preference patterns
- Distance to nearest school/s

2.4.5. Once Planning Areas have been set, these can be amended if required. Where a local authority experiences difficulty in planning school places effectively because it believes basic need within an area is being masked, it should review the structure of its pupil planning areas.

2.4.6. The impact of changes that have taken place or will shortly take place such as housing developments, schools opening or closing and any infrastructure changes, such as new roads should be assessed, and a PA structure should be designed to reflect the changed landscape more effectively.

2.4.7. A local authority may also wish to reflect on its PA structure where no such changes have occurred, but it has other reasons for reviewing. For example, an increase in inward migration or birth rate, or higher pupil numbers now impacting on the secondary sector.

2.4.8. The Appeal decision at Coombe Hill, (appeal reference APP/G1630/W/20/3257625, and attached at Appendix AYA05) noted that, where a development was in an area close to planning area boundaries, it may be appropriate to consider multiple planning areas as being relevant.

3. Planning Context and the Proposed Application Site

3.1. The Site and its Planning Context

3.1.1. The proposed development site lies within the planning remit of Rother District Council (RDC).

3.1.2. The site lies within the primary and secondary catchment areas of schools for which the local education authority is East Sussex County Council (ESCC).

3.1.3. Currently, RDC is progressing a Regulation 18 (Reg 18) Draft Local Plan. RDC acknowledges it is 7,077 dwellings short against the target of 15,504 homes in the plan period. RDC's Reg 18 allocations are providing for 8,427 homes against a target of 15,504, representing just 54% of its target.)

3.1.4. Of the 8,427 homes included on draft allocation sites, 986 of these are in Northern Rother, which equates to 12%. If Rother are required to identify further land for unmet housing need, and using a similar percentage for allocations in Northern Rother, 12% of the 7,077 shortfall could equate to another 849 homes in Northern Rother on top of the 986 currently identified by draft allocations.

3.1.5. The proposed application site at Knelle Road, Robertsbridge, is found immediately north of Robertsbridge Community College and is situated in the Northern Rother area. It is not currently allocated in the draft Local Plan. The site location plan is shown below:



[source: Location Plan, attached at Appendix AYA06]

3.1.6. The Northern Rother area is defined by the wards of Burwash, Burwash Common, Etchingam, Hurst Green, Robertsbridge, Staplecross, Flimwell, Ticehurst, and Stonegate.

3.1.7. The overall indicated dwelling numbers for all draft allocated sites in the Northern Rother Area is 986. Of these, 740 dwellings are within the Robertsbridge Community College catchment area.

- 3.1.8. Currently the proposed number of dwellings for the site at Knelle Road would be up to 140 dwellings if there is no land given over to educational use, or circa 100 dwellings if one hectare of land was given over to educational use.
- 3.1.9. Currently, there is no indicative mix, but it will be a mix of 1-4 bedroom homes and is envisaged to comply with local needs assessment.

4. The Local Position

4.1. East Sussex County Council's Duty to Secure Sufficient School Places

4.1.1. The site lies within the area for which the responsible local education authority is East Sussex County Council (ESCC).

4.1.2. The Education Act 1996 (as amended) provides in section 14(1):

"A local education authority shall secure that sufficient schools for providing - (a) primary education and (b) secondary education ... are available for their area".

4.1.3. This duty applies in relation to all the children in the local education authority area, whether they have lived there all their lives or have just moved into a new development.

4.1.4. The residential component of the proposed development will include family housing. Family housing often includes school age children who will seek to enrol in local schools. Those schools may or may not be sufficient to accommodate these children without the need for additional capacity to be provided.

4.2. School Forms of Entry & Admissions Number

4.2.1. School capacity is often measured in terms of forms of entry ('FE'). A single class can typically accommodate up to 30 children. The Number on Roll ('NOR') is the number of children at a school.

4.2.2. Reception is the year of entry to primary school and is often referred to as "Year R". The subsequent year groups are often referred to as "Year 1" to "Year 6" respectively.

4.2.3. As primary schools have seven year-groups, a 2FE primary school would have capacity for 420 children [*calculation*: $30 \times 7 \times 2 = 420$]; with 1FE of primary education provision equating to 210 primary school places.

4.2.4. Similarly, as secondary schools have five year-groups (starting with entry into Year 7), a 6FE secondary school would have capacity for 900 pupils aged 11-16 [*calculation*: $30 \times 5 \times 6 = 900$]; with 1FE of secondary education provision equating to 150 secondary school places. Sixth form consists of two year-groups after secondary school.

4.2.5. All schools have a Published Admissions Number (PAN) which indicates the number of pupils the school can take in each year group. If this number is then multiplied by the number of year groups at the school, this gives an indicative capacity of the numbers that the school can theoretically accept.

4.3. Patterns of Pupil Migration

4.3.1. As there is likely to be movement of children between respective schools' catchment areas, pseudo-catchment areas (based on furthest distances of places offered), designated areas, or priority areas, our analyses include schools within a reasonable distance of the proposed development.

4.3.2. This movement of children due to parental preference and other factors is often referred to as "inflow" and "outflow".

4.4. Local School Catchment Areas

4.4.1. A home to school travel distance of greater than two miles (or the absence of a safe, accompanied, walking route) gives rise to a requirement for the provision of free transport by the local education authority for pupils under the age of 8, and the same applies, at a distance of three miles for those over 8 years of age, as indicated by the DfE in its document "Home to school travel and transport guidance" [source: Appendix AYA07].

4.4.2. In order to assess the likely impact of the proposed development regarding primary school place provision we have considered the impact on schools within a two-mile distance of the proposed development site. To consider the impact on secondary school place provision, this distance has been increased to three miles. This distance enables us to consider which school place planning areas are relevant, in line with the appeal decision at Combe Hill, Gloucester, attached at Appendix AYA05.

4.4.3. We consider this approach is reasonable in assessing the likely overall impact on local places of the proposed development.

4.4.4. In this instance the relevant local pupil planning areas are Rural Rother Primary and Rural Rother Secondary.

4.4.5. The map below indicates the site and the location of local primary and secondary schools. The locations of these schools are indicated below (the yellow icons indicate single school locations of primary schools and the green that of the secondary school). The location of the site is also indicated by the green icon:



4.4.6. A walking distance to local schools has been approximated from Robertsbridge Community College, Knelle Road, TN32 5EA.

4.5. Local Primary Schools – Current Baseline

4.5.1. There is one primary school within two straight line miles of the proposed development site, and a further seventeen schools within the Rural Rother Primary Planning Area. According to the latest data available in the public domain, in January 2025 the position at local primary schools (including infant and junior schools) is as shown in the table below.

School Name	Straight Line Distance (miles)	Net Capacity	Number on Roll (NOR)	Surplus Places
Salehurst CE Primary School	0.7	210	169	41
Beckley CE Primary School	9.8	105	90	15
Bodiam CE Primary School	4.9	105	70	35
Brede Primary School	7.5	140	101	39
Burwash CE School	4.9	175	163	12
Crowhurst CE Primary School	9	105	93	12
Dallington CE Primary School	5.9	105	109	0
Etchingham CE Primary School	2.9	105	98	7
Guestling-Bradshaw CE Primary School	12	210	194	16
Hurst Green CE Primary School and Nursery *	2.8	140	127	13
Icklesham CE Primary School *	13	105	125	0
Netherfield CE Primary School	5.6	140	127	13
Northiam CE Primary School and Nursery	9	140	150	0
Sedlescombe CE Primary School	5.7	210	201	9
Staplecross Methodist Primary School	5.1	105	84	21
Stonegate CE Primary School *	7.2	105	117	0
Ticehurst and Flimwell CE Primary School	7	210	105	105
Westfield School	8.4	210	183	27
TOTAL		2,625		365

Table: Primary School pupil places within the Rural Rother Primary School Place Planning area.

[source: data from DfE website]

* - these schools include nursery classes

4.5.2. The above table uses the Audit Commission definition of Surplus Places, in line with best practice in this matter, which treats schools with a negative surplus as though they had a zero surplus. Since the number of pupils a school must admit in any year is directly related to its capacity, any school that chooses to admit numbers beyond that level must necessarily be deemed to be capable of accommodating those numbers.

4.5.3. On the above evidence it is clear that in January 2025 there were **365** surplus primary school places within local schools.

4.5.4. The total of surplus places as a percentage of primary school capacity was **13.9%** [calculation: 365 / 2625].

4.6. Secondary Schools - Current Baseline

4.6.1. There is one secondary school within three straight line miles of the proposed development site, and this school is the only school in the Rural Rother Secondary Planning Area.

4.6.2. According to the latest data available in the public domain, in January 2025 the position at local secondary schools is as shown below:

School Name (11-16 unless stated)	Straight Line	Walking Distance	Net Capacity	Number on Roll (NOR)	Surplus Places
Robertsbridge Community College	0.00	0.00	800	733	67
TOTAL			800		67

Table: Secondary School pupil places in the local secondary school planning area

[Source: data from DfE website].

4.6.3. The above table uses the Audit Commission definition of Surplus Places, in line with best practice in this matter, which treats schools with a negative surplus as though they had a zero surplus. Since the number of pupils a school must admit in any year is directly related to its capacity, any school that chooses to admit numbers beyond that level must necessarily be deemed to be capable of accommodating those numbers.

4.6.4. On the above evidence it is clear that in January 2025 there were **67** surplus secondary school places within local schools.

4.6.5. The total of surplus places as a percentage of secondary school capacity was **8.38%** [calculation: 67 / 800].

5. Projected Future Requirements

5.1. Assessment of the Proposed Development and Growth area

5.1.1. The most recent published guidance on developer contributions from ESCC is dated 2015, and does not include information on pupil yield figures.

5.1.2. In order to assess a likely yield from the proposed development, the DfE's published child yield figures for the RDC area have been calculated as follows:

Pupil Yield is split by School phase and School type for Rother

Chart Table

Academic Year	Local authority	School type	Early Years	Primary	Secondary	Special Schools/AP
2021/22	Rother	Mainstream	0.063	0.256	0.129	£
2021/22	Rother	Special School	£	£	£	0.012

5.1.3. Applying these PPRs to the proposed developments within the Regulation 18 draft Local Plan that also sit within the catchment area of Robertsbridge Community College, a total of 740 dwellings would give the following child yields as a range. We have also used these figures to calculate the likely yield from the development site at Knelle Road (between 100 and 140), and the totality of both the draft Local Plan sites and the development site (assuming a reduction in numbers for school site provision):

Phase	Development Site Yield (100 dwellings)	Development Site Yield (140 Dwellings)	In Catchment Growth Area (740 dwellings)	In Catchment Growth area + Development Site (840 dwellings)
Early Years	6.3	8.82	46.62	52.92
Primary	25.6	35.84	189.44	215.04
Secondary	12.9	18.06	95.46	108.36

5.1.4. When considering the potential for further growth in Northern Rother in line with RDC meeting its target number of housing, as discussed in paragraph 3.1.5 above, this would effectively lead to double the number of dwellings included in the final column and therefore double the child yield:

Phase	In Catchment Growth area + Development Site (840 dwellings)	In Catchment Growth area + Development Site + Housing Target (1689 dwellings)
Early Years	52.92	106.407
Primary	215.04	437.451
Secondary	108.36	217.881

5.1.5. Commentary on the relevance of this position with regards to the education mitigation strategy is set out later in this Report.

5.2. The Trend in Annual Local Birth Numbers

5.2.1. The Office for National Statistics (ONS) birth rate figures show the total annual births within the Rural Rother area are around their lowest levels in the last eleven years and **have fallen by 1FE** from a peak in 2015.

5.2.2. To cover the Rural Rother area, the map below shows the relevant census output areas used:



5.2.3. This is best illustrated by the table below:

Live births in England and Wales for small geographic areas												
ONS Crown Copyright Reserved [from Nomis on 16 March 2026]												
Area	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
msoa2011:E02004394 : Rother 003	43	50	55	45	51	63	52	63	45	42	42	50
msoa2011:E02004392 : Rother 001	87	96	101	79	96	77	89	78	75	76	81	75
	130	146	156	124	147	140	141	141	120	118	123	125

5.2.4. Those children born in 2015 will be entering Year 7 in September 2026 and the 2021 births will be due to start primary school in September 2026 and secondary school seven years later (approximately, given the difference between calendar year and academic year).

5.2.5. Commentary on the relevance of this position with regards to the education mitigation strategy is set out later in this Report.

5.3. ESCC Forecast of Pupil Places (Primary)

5.3.1. The site is located in the Rural Rother Primary planning area.

5.3.2. It should be noted that large strategic sites may be delivered beyond the local plan period, and therefore beyond the end of the forecast periods.

5.3.3. Based on the ESCC School Organisation Plan 2025-2029, the latest data which has been published, the forecasts for this area are as follows:

Primary Planning Area / Number of Schools in Planning Area	Actual NET Capacity		Actual and Forecast Numbers on Roll		Surplus / Deficit Places	
	24/25	28/29	24/25	28/29	24/25	28/29
Rural Rother	2,625	2,625	2,306	2,075	319	550

Table: Forecast Primary School pupil places by academic year

[Source: School Forecast Data from ESCC School Organisation Plan 2025-2029, appended at APPENDIX AYA08].

5.3.4. On the basis of these ESCC school forecasts and school capacities it appears that the current level of surplus primary school places will increase over the coming years to 2028/29 in the local planning area.

5.3.5. It is unclear to what extent these forecasts include anticipated growth in pupil numbers generated by new housing.

5.3.6. Commentary on the relevance of this position with regards to the education mitigation strategy is set out below.

5.4. ESCC Forecast of Pupil Places (Secondary)

5.4.1. The site is located within the Rural Rother Secondary planning area.

5.4.2. It should be noted that large strategic sites may be delivered beyond the local plan period, and therefore beyond the end of the forecast periods.

5.4.3. Based on the ESCC School Organisation Plan 2025-2029, the latest data which has been published, the forecasts for this area are as follows:

Secondary Planning Area / Number of Relevant Schools	Actual NET Capacity		Actual and Forecast Numbers on Roll		Surplus / Deficit Places	
	24/25	28/29	24/25	28/29	24/25	28/29
Rural Rother	800	750	733	587	67	163

Table: Forecast Secondary School pupil places by academic year

[Source: School Forecast Data from ESCC School Organisation Plan 2025-2029, appended at APPENDIX AYA08].

5.4.4. On the basis of these ESCC school forecasts and school capacities it appears that the current level of surplus secondary school places will increase over the coming years to 2028/29, despite a reduction in capacity of 50 places from September 2026 onwards.

5.4.5. It is unclear to what extent these forecasts include anticipated growth in pupil numbers generated by new housing.

5.4.6. Commentary on the relevance of this position with regards to the education mitigation strategy is set out below.

5.5. Robertsbridge Community College site requirements

- 5.5.1. Guidance for school site areas is contained within the DfE's Building Bulletin 103 (BB103), with the relevant extract attached at Appendix AYA09.
- 5.5.2. This sets out, that for a 750-place school, such as Robertsbridge Community College, the minimum overall site area is 4.65Ha, and the minimum area for soft outdoor PE (team game playing fields) is 3.225Ha.
- 5.5.3. Currently, by our measurements (which await confirmation from ESC), the overall site area is 4.51Ha, which is below the minimum requirement, and the available soft outdoor PE space is 3.07Ha which is 0.155Ha below the minimum requirement.
- 5.5.4. In terms of any future expansion of Robertsbridge Community College, the next logical school size would be to increase by 1FE to a 6FE school (i.e. 900 places). The minimum site area for such a school would be 5.4Ha, which is currently 0.89Ha greater than the current site area.

5.6. AYA Assessment of the Required Mitigation

- 5.6.1. In order to bring Robertsbridge Community College's site in line with DfE Guidance, in particular team game playing field requirements, additional playing field land is required for the current number of places offered at the school.
- 5.6.2. Further land would also be required to future proof the site against an increase in pupil numbers either from housing or future birth rate changes.
- 5.6.3. Currently, the only way to achieve this would be to allocate this site at Knelle Road for circa 100 houses along with 1.0Ha of land for Robertsbridge Community College, adjacent to its existing site.
- 5.6.4. In terms of pupil numbers from this site and the Northern Rother Growth area, as it relates to both primary and secondary level, the overall impact is less than the level of surplus places forecast for the relevant Planning Areas in the ESCC School Organisation Plan up to 28/29.
- 5.6.5. This remains true even if the Northern Rother area's housing numbers increase in line with the actual housing target for RDC as set out 3.1.4 above (subject to the reinstatement of the 50 places about to be removed from secondary capacity).
- 5.6.6. This proposed development, along with those already in the draft Local Plan for this area, can therefore come forward, providing the site requirements are met, without further financial contributions.
- 5.6.7. Any further growth in this area, beyond the level set out in 3.1.4 above would require an expansion to secondary school provision, and the future proofing of the Robertsbridge Community College site area will be key to ongoing future growth in Northern Rother.

6. Conclusions

6.1. Commentary and Conclusion of Required Mitigation for the Growth area

6.1.1. The impact of the proposed Growth Area in Northern Rother is less than the forecast number of places available in the local primary and secondary school place planning area.

6.1.2. This remains true even if the additional land north of Robertsbridge Community College is also allocated.

6.1.3. Currently, Robertsbridge Community College is below the minimum school site area, and the minimum Team Game Playing Field as set out in the DfE Guidance, for a school of its capacity.

6.1.4. The allocation of the land to the north of the Community College would therefore have the added benefit of being able to provide land to address the shortfall in site area, notably team game playing fields, as well as future proof the site against expansion, should this become necessary in the future.

7. Appendices

7.1. The following Appendices accompany this document:

- APPENDIX AYA01 - DfE Guidance on Securing Developer Contributions, November 2019;
- APPENDIX AYA02 - Malpas Appeal Decision;
- APPENDIX AYA03 - Audlem Appeal Decision;
- APPENDIX AYA04 - DfE Guidance on Local Authority Planning Areas, September 2021;
- APPENDIX AYA05 - Combe Hill, Gloucester Appeal Decision;
- APPENDIX AYA06 - Illustrative Masterplan;
- APPENDIX AYA07 - DfE Guidance on Home to School Transport;
- APPENDIX AYA08 - ESCC School Organisation Plan 2025-2029;
- APPENDIX AYA09 - Extract from DfE Building Bulletin 103.

APPENDIX

2



Rother District Council – Planning Policy

By Email Only

Russetts,
Knelle Road,
Robertsbridge,
East Sussex,
TN32 5DY

9th March 2026

Dear Sir/Madam,

Subject: Russetts, Knelle Road, Robertsbridge, TN32 5DY ('Russetts') – Access & Land Assembly.

I write with the agreement of my father, [REDACTED] the owner of *Russetts*, a bungalow located adjacent to the existing agricultural access serving land at Beech Farm, Knelle Road, Robertsbridge.

We understand that some of the adjoining land at Beech Farm is currently being promoted through the Regulation 18 consultation process as a potential site for future residential development.

We have been approached by the adjacent owners regarding the potential role our land could play in facilitating improved access arrangements to serve the site being promoted. We recognise that enhancements to the existing access could assist in delivering a suitable and safe access solution should the site be allocated for development in the future.

In this context, we confirm that we are supportive of engaging constructively with the owners of Beech Farm, the site promoters and the Council regarding the potential inclusion of our property within a wider land assembly, should this be required to facilitate appropriate access improvements. We are positively disposed to working collaboratively with the relevant parties to explore how our land could assist in delivering an appropriate and safe access solution to serve the adjacent site. We would be willing in principle to see our property incorporated within such arrangements and do not object to the promotion of the adjoining land for development. Our intention is to engage positively and pragmatically with the relevant parties to ensure that, should the site be taken forward through the Local Plan process, land ownership matters would not represent a barrier to the delivery of an appropriate access solution, subject to appropriate commercial terms being agreed. Our intention in writing is simply to confirm that we are supportive of ongoing discussions and are not opposed in principle to our property being considered as part of a future access solution, should the site progress through the Local Plan process.

We trust this assists the Council in understanding that there is a willingness from the neighbouring ownership to engage positively in helping to facilitate an appropriate access solution for the site.

Yours faithfully,

[REDACTED]

APPENDIX

3





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DISCUSSION

- Site boundary (11.96ha)
 - Land in same ownership
 - - - Public Right of Way (PRoW)
 - ▨ Railway line and 30m buffer
 - Railway station
 - Existing vegetation (retained and enhanced where possible)
 - Flood zone 2
 - Flood zone 3
 - ✱ Listed building
 - Bus stop
 - ~ Rear/side residential boundary
 - ~ Rear/side college boundary
 - ▨ Ancient Woodland and 15m buffer
 - ← Existing access - to be retained, widened and enhanced to provide vehicular access with pedestrian footway
 - ← Proposed emergency access and pedestrian/cycle connectivity to PRoW
 - - - Proposed primary street
 - Proposed recreational routes
 - Active travel route providing access to mainline railway and high street beyond
 - Proposed area for Biodiversity Net Gain (BNG)
 - Proposed additional planting for ecological benefits and BNG
 - ~ Proposed enhanced boundary planting
 - Indicative play area
 - Indicative attenuation basin
 - Proposed public open space
 - Proposed residential developable area (3.49 ha at 35dph = 122 homes)
 - Proposed residential developable area up to 15 storeys (0.67 ha at 30dph = 20 homes)
- N.B. The entire extent shown in this plan is within the High Weald National Landscape*

Rev. A 18/03/2026 Revised proposals to align with LVA

Land at Knelle Road ROBERTSBRIDGE

Constraints and Opportunities Plan

Job ref: 796	Drawing number: SK01	Revision: A
Scale: 1:2500 @ A2	Date: March 2026	



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DISCUSSION

- Site boundary (11.96ha)
- Land in same ownership
- - - Public Right of Way (PRoW)
- Robertsbridge Railway Station
- 1 Proposed vehicular and pedestrian access off Knelle Road
- 2 Proposed emergency access
- 3 Proposed connection to PRoW
- 4 Proposed primary street
- 5 Proposed shared surface street
- 6 Proposed private drive
- 7 Proposed area for Biodiversity Net Gain (BNG)
- 8 Proposed additional planting for ecological benefits and BNG
- 9 Proposed enhanced boundary planting
- 10 Proposed landscaped edge to school
- 11 Proposed 15m buffer to Ancient Woodland
- 12 Proposed play area
- 13 Proposed attenuation basin
- Active travel route providing access to mainline railway and high street beyond
- Proposed recreational routes

Rev.	Date	Description
		Land at Knelle Road ROBERTSBRIDGE
		Illustrative masterplan
Job ref: 796	Drawing number: SK02	Revision:
Scale: 1:2500 @ A2	Date: March 2026	



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DISCUSSION

- Site boundary (11.88ha)
- Land in same ownership
- - - Public Right of Way (PROW)
- ▨ Railway line and 30m buffer
- Railway station
- Existing vegetation (retained and enhanced where possible)
- Flood zone 2
- Flood zone 3
- ✱ Listed building
- Bus stop
- ~ Rear/side residential boundary
- ~ Rear/side college boundary
- ▨ Ancient Woodland and 15m buffer
- ← Existing access - to be retained, widened and enhanced to provide vehicular access with pedestrian footway
- ← Proposed emergency access and pedestrian/cycle connectivity to PROW
- - - Proposed primary street
- Proposed recreational routes
- Active travel route providing access to mainline railway and high street beyond
- Proposed area for Biodiversity Net Gain (BNG)
- Proposed additional planting for ecological benefits and BNG
- ~ Proposed enhanced boundary planting
- Indicative play area
- Indicative attenuation basin
- Proposed public open space
- Proposed residential developable area (2.67 ha at 35dph = 93 homes)
- Proposed residential developable area up to 15 storeys (0.67 ha at 30dph = 20 homes)
- Proposed 1 hectare extension to Robertsbridge Community College

Rev.	Date	Description
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Land at Knelle Road ROBERTSBRIDGE

Constraints and Opportunities Plan_Opt 2

Job ref: 796	Drawing number: SK03	Revision:
Scale: 1:2500 @ A2	Date: March 2026	



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N.B The entire extent shown in this plan is within the High Weald National Landscape



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- 9 Proposed enhanced boundary planting
- 10 Proposed landscaped edge to school
- 11 Proposed 15m buffer to Ancient Woodland
- 12 Proposed play area
- 13 Proposed attenuation basin
- 14 Proposed area safeguarded for Robertsbridge Community College expansion
- Active travel route providing access to mainline railway and high street beyond
- Proposed recreational routes

Rev.	Date	Description
Land at Knelle Road ROBERTSBRIDGE		
Illustrative masterplan_Opt 2		
Job ref: 796	Drawing number: SK04	Revision:
Scale: 1:2500 @ A2	Date: March 2026	



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APPENDIX

4



TRANSPORT TECHNICAL NOTE

JOB REF. **PL/LC/36508** CLIENT **Rurban Estates Limited**

SITE
Land off Knelle Road, Robertsbridge

1.1 INTRODUCTION

- 1.1.1 This Transport Technical Note (TTN) has been prepared in support of a call for sites submission to Rother District Council (RDC) by Rurban Estates in relation to Land off Knelle Road, in Robertsbridge, East Sussex, which is being promoted for residential development.
- 1.1.2 The current proposals are for the development of up to 145 dwellings. This TTN outlines the proposed multi-modal access strategy, considers the accessibility of the site, quantifies the likely vehicular trip generation of the potential development and identifies appropriate and proportionate mitigation measures.

1.2 PROPOSAL SITE

- 1.2.1 The site is located to the north of Knelle Road and Robertsbridge Community College and east of Bugsell Lane, approximately 780m to the north-west of the centre of Robertsbridge 'as the crow flies'. The location of the site within a local context is shown in Figure 1 overleaf.

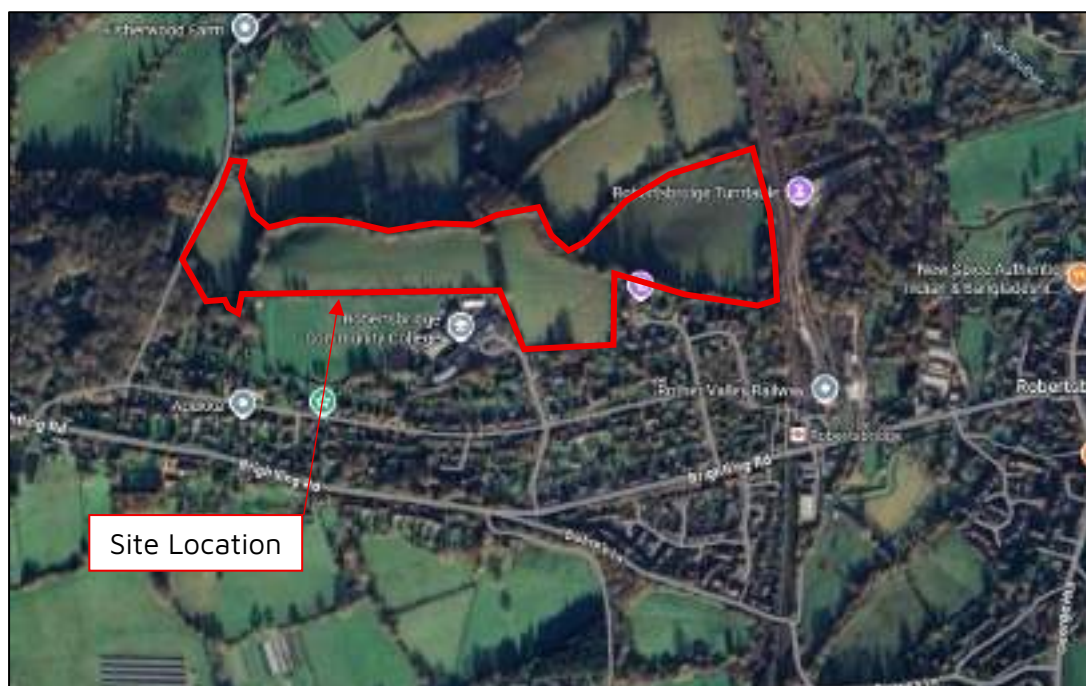


FIGURE 1: SITE LOCATION (COURTESY OF GOOGLE MAPS)

- 1.2.2 The site currently comprises of undeveloped greenfield land. It is accessible from a gated agricultural access off Knelle Road, and is bound to the north by further greenfield land, to the east by the Hastings-Tunbridge Wells-London railway line operated by Southeastern Railway, to the south by Robertsbridge Community College and residential dwellings, and to the west by Bugsell Lane.

1.3 DEVELOPMENT PROPOSALS

- 1.3.1 The proposals comprise the construction of up to 145 dwellings along with associated landscaping and open space. An indicative layout plan is included at **Appendix A**.
- 1.3.2 It is proposed that vehicular access to the development would be achieved by way of the upgrading of the existing agricultural access off Knelle Road. Knelle Road will be reprioritised, with priority given to the development and a new priority junction formed to serve Robertsbridge Community College. An indicative design is included at **Appendix B**.
- 1.3.3 Knelle Road will be widened to 5.5m at its junction with Langham Road before narrowing to 3.7m, with a priority working system implemented in favour of northbound traffic. This will allow for the retention of the existing footway width and on-street parking bays in this area. The carriageway will then widen again to 5.5m to the north of this feature and route into the proposal site. The drawing

included at **Appendix B** confirms that these modifications can be achieved within the extent of the adopted highway together with one adjoining third-party ownership who are agreeable-in-principle to working with the Promoter/Landowner to facilitate subject to commercial terms being finalised.

- 1.3.4 A looped arrangement within the site will be explored which would see the internal distributor road be split upon entry to the site. This would minimise the risk of obstruction. In addition, an emergency access from Bugsell Lane would be provided.
- 1.3.5 The existing footway on the western side of Knelle Road will be maintained as existing, noting that it provides an important facility for students of Robertsbridge Community College. An uncontrolled pedestrian crossing equipped with dropped kerbs and tactile paving will be provided across the College access, connecting to a 2.0m width footway on the western side of the development access road.
- 1.3.6 The provision of compensatory parking facilities for the dwelling known as 'Russetts' adjacent to the site access (and within the land ownership) will be explored.

1.4 PEDESTRIAN AND CYCLE ACCESSIBILITY

- 1.4.1 A footway measuring approximately 2.5m in width is provided on the western side of Knelle Road on its approach to the College, narrowing to approximately 1m in the vicinity of the junction with Langham Road.
- 1.4.2 Langham Road routing east from this junction is provided with c.1.2m wide footways on both sides of the carriageway, which connect with equivalent infrastructure on Bellhurst Road and Brightling Road, which provide onward linkages to Robertsbridge Railway Station and village centre. These footways are subject to street lighting.
- 1.4.3 Figure 2 overleaf displays the local Public Rights of Way (PRoW) network in the site vicinity, where purple lines indicate Footpaths.

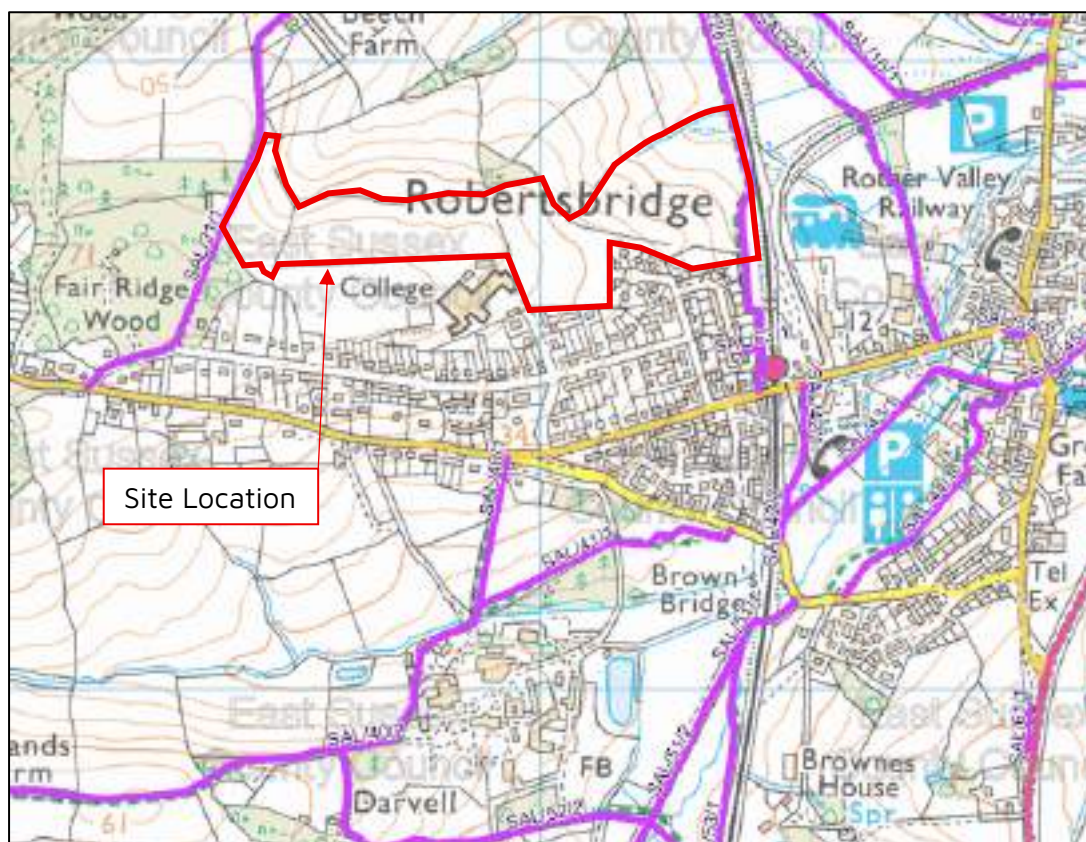


FIGURE 2: PROW NETWORK LOCAL TO SITE (COURTESY OF EAST SUSSEX COUNTY COUNCIL)

- 1.4.4 Footpath SAL/21/1 bounds the site to the west and routes along Bugsell Lane, terminating at Bugsell Farm and Beech Farm.
- 1.4.5 Footpath SAL/26/1 bounds the site to the east, parallel to the railway line, and provides onward connectivity to further PRoW to the north of Robertsbridge.
- 1.4.6 There is currently no formal cycling infrastructure local to the site; however much of the local highway network within and around Robertsbridge is considered suitable for on-carriageway cycling by competent individuals in view of its predominantly low-speed and lightly-trafficked nature.

1.5 PUBLIC TRANSPORT ACCESSIBILITY

- 1.5.1 The closest pair of frequently-serviced bus stops is located on George Hill, approximately 1.0km (or a 13-minute walk time) to the east of the existing site access. These stops are equipped with flag-and-post arrangements, timetable information and clearway markings.
- 1.5.2 Table 1 overleaf lists the bus services that are accessible from these stops.

SERVICE NO.	ROUTE	SERVICE FREQUENCY			
		WEEKDAY PEAK	WEEKDAY OFF-PEAK	SATURDAY	SUNDAY
360	Etchingham – Bexhill College	School service	No service	No service	No service
381	Westfield – Robertsbridge College	School service	No service	No service	No service
382	Westfield – Robertsbridge College	School service	No service	No service	No service
383	Peasmarsh – Sedlescombe – Robertsbridge College	School service	No service	No service	No service
384	Ashdown House – Robertsbridge College	School service	No service	No service	No service
1066	Hastings – Hawkhurst – Tunbridge Wells	One per hour	One per hour	One per hour	One every two hours
B73	Battle – Robertsbridge – Mountfield – Battle	No service	One per day (Tuesdays only)	No service	No service
B74	Mountfield – Netherfield – Battle	No service	Two per day	No service	No service
U1	Johns Cross – Flimwell – Ticehurst – Uplands College	School service	No service	No service	No service

TABLE 1: BUS SERVICES ACCESSIBLE FROM GEORGE HILL

1.5.3 Robertsbridge Railway Station is located approximately 650m (or an eight-minute walk) to the south-east of the existing site access. This station is afforded 73 parking spaces (including four accessible bays), 20 sheltered cycle parking spaces,

a seating area, a ticket machine and ticket office, and step-free access to both platforms.

1.5.4 Table 2 below details the direct train services that are accessible from this station.

LOCATION	SERVICE FREQUENCY				AVERAGE JOURNEY TIME
	WEEKDAY PEAK	WEEKDAY OFF-PEAK	SATURDAY	SUNDAY	
Hastings	Two per hour in the AM peak, three-to-four per hour in the PM peak	One-to-two per hour	One per hour	One per hour	22 minutes
London Charing Cross via Tunbridge Wells and Tonbridge	Two per hour	One per hour	One per hour	One per hour	Tunbridge Wells = 25 minutes Tonbridge = 38 minutes London Charing Cross = 1 hour 19 minutes

TABLE 2: TRAIN SERVICES ACCESSIBLE FROM ROBERTSBRIDGE RAILWAY STATION

1.5.5 Utilising the Urban Access tool designed by Spatial Design Hub, Figure 3 overleaf provides a graphical illustration of these public transport routes, with each red dot denoting a bus stop and each blue dot denoting a train station located on the above routes.



FIGURE 3: BUS AND TRAIN ROUTES FROM ROBERTSBRIDGE (COURTESY OF SPATIAL DESIGN HUB)

1.5.6 It is evident that the site benefits from ready access to frequent public transport services, which would enable future residents to access an extensive range of services and facilities within higher order centres throughout the week, in addition to those within Robertsbridge itself (see below).

1.6 SITE ACCESSIBILITY

1.6.1 A range of everyday services and facilities is available in Robertsbridge, which can be accessed via the aforementioned pedestrian routes.

1.6.2 Table 3 below lists a selection of these, along with their approximate distances and walking times from the existing site access.

SERVICE / FACILITY	DISTANCE	WALK TIME
Robertsbridge Community College	75m	<1 minute
Public House – Ostrich Hotel	600m	8 minutes
GP – Oldwood Surgery	750m	9 minutes
Post Office – Robertsbridge Village Store & Post Office	850m	11 minutes
Café – Judges Baker	1.0km	13 minutes
Convenience Store – OneStop	1.0km	13 minutes
Nursery – Robertsbridge Children’s Services	1.1km	14 minutes
Primary School – Salehurst Church of England Primary School	1.1km	14 minutes
Chemist – Robertsbridge Pharmacy & Travel Clinic	1.1km	14 minutes
Dentist – Robertsbridge Dental Practice	1.1km	14 minutes
Restaurant – New Spice	1.1km	14 minutes

TABLE 3: SERVICES AND FACILITIES LOCAL TO PROPOSAL SITE

1.6.3 The walk times quoted above are based on a walk speed of 80m per minute, a figure which is widely used to estimate walk times and used within the London-based Public Transport Accessibility Level (PTAL) analysis. It aims to provide a typical average value that estimates it takes five minutes to walk 400m, ten minutes to walk 800m and so on.

1.7 TRIP GENERATION ASSESSMENT

1.7.1 The potential vehicular trip generation of the proposed development has been forecast with reference to the national TRICS trip rate database. To ensure a robust initial assessment of the site, surveys in the categories ‘03 – RESIDENTIAL, A – HOUSES PRIVATELY OWNED’ and ‘03 – RESIDENTIAL, B – AFFORDABLE / LOCAL AUTHORITY HOUSING’ have been selected. Survey sites in England (excluding

Greater London), Scotland and Wales have been considered in 'Suburban Area' and 'Neighbourhood Centre' locations. Surveys undertaken during the period of Covid-19 travel restrictions have been excluded. The resulting average TRICS trip rates are shown in Table 4 below, with the full TRICS reports included at **Appendix C**.

PERIOD	ARRIVALS	DEPARTURES	TOTAL
HOUSES PRIVATELY OWNED (TRIPS / DWELLING)			
AM Peak 08:00-19:00	0.127	0.356	0.483
PM Peak 17:00-18:00	0.293	0.151	0.444
Daily 07:00-19:00	1.990	2.090	4.080
AFFORDABLE / LOCAL AUTHORITY HOUSES (TRIPS / DWELLING)			
AM Peak 08:00-19:00	0.141	0.264	0.405
PM Peak 17:00-18:00	0.319	0.196	0.515
Daily 07:00-19:00	2.128	2.184	4.312

TABLE 4: TRICS TRIP RATES

1.7.2 These rates have subsequently been multiplied by the upper limit of 145 dwellings proposed – at a policy-compliant split of 58 units of affordable housing and 87 units of privately-owned housing – to provide the forecast vehicle trip generation in Table 5 overleaf. Please note that any inaccuracies are the result of rounding in MS Excel.

PERIOD	ARRIVALS	DEPARTURES	TOTAL
HOUSES PRIVATELY OWNED (87 UNITS)			
AM Peak 08:00-19:00	11	31	42
PM Peak 17:00-18:00	25	13	39
Daily 07:00-19:00	173	182	355
AFFORDABLE / LOCAL AUTHORITY HOUSES (58 UNITS)			
AM Peak 08:00-19:00	8	15	23
PM Peak 17:00-18:00	19	11	30
Daily 07:00-19:00	123	127	250
TOTAL (145 UNITS)			
AM Peak 08:00-19:00	19	46	66
PM Peak 17:00-18:00	44	25	68
Daily 07:00-19:00	297	309	605

TABLE 5: TOTAL DEVELOPMENT TRIP GENERATION

- 1.7.3 It is noted that the proposed development has the potential to generate approximately 66 vehicle movements during the weekday AM peak hour and 68 movements during the PM peak hour, with 605 movements forecast across the 12-hour daytime period (07:00-19:00). This equates to approximately 50 movements per hour – or one movement per minute – on average.

1.8 TRIP DISTRIBUTION AND ASSIGNMENT

- 1.8.1 An initial vehicular trip distribution and assignment exercise has been completed using 'Location of usual residence and place of work by method of travel to work' data from the 2011 Census for Middle-Layer Super Output Area (MSOA) 'Rother 001', in which the site is located.
- 1.8.2 It is noted that whilst equivalent data from the 2021 Census has subsequently been released, this was obtained during the Covid-19 pandemic when travel demand was suppressed. The 2011 data has therefore been used in the interest of robustness.
- 1.8.3 On this basis, the total vehicular trip generation set out in Table 5 has been distributed and assigned to the local highway network on the basis of typical peak period journey times from the Google journey planner, as summarised in Table 6 below.

JUNCTION	PERCENTAGE DISTRIBUTION	AM PEAK TRIPS	PM PEAK TRIPS
Station Road / High Street / George Hill	68%	45	46
Northbridge Street / A21 / Church Lane	59%	39	40
Brightling Road / Bishop's Lane	32%	21	22
George Hill / A21	23%	15	15
Brightling Road / Ludpit Lane	19%	12	13
Heathfield Gardens / George Hill	13%	9	9

TABLE 6: FORECAST VEHICLE TRIP DISTRIBUTION

- 1.8.4 On the basis of these forecast impacts and the relatively uncongested nature of the local highway network, it is not considered that the proposed development will have a material adverse impact on the operation of off-site junctions.

1.9 TRANSPORT STRATEGY

- 1.9.1 The design of the internal site layout is critical to the uptake of active and sustainable travel modes. To this end, the street network will prioritise non-car

modes at every opportunity, with wide, direct, landscaped and well-surveilled walking and cycling routes to provide along principal route corridors and shared surfaces and 'home zones' within lightly trafficked areas.

- 1.9.2 The implementation of cycle-to-work schemes by both employers and local authorities has achieved an increase in the number of people who are opting to cycle either their full commute or part of it (e.g. to their local railway station). This will be facilitated by the provision of secure cycle storage facilities for every dwelling.
- 1.9.3 Where the use of a car remains necessary, the increased uptake of electric and low-emission vehicles will progressively reduce their environmental impact, and these will be promoted through the installation of 'active' charging infrastructure for every dwelling.
- 1.9.4 As has been detailed, the site is located within close proximity to a frequently serviced pair of bus stops and a railway station. Measures to promote the use of public transport will be explored, including timetable information being provided to new residents through the distribution of Travel Information Packs and the provision of discounted bus tickets or Railcards.

1.10 SUMMARY AND CONCLUSION

- 1.10.1 This Transport Technical Note (TTN) has been prepared in support of a call for sites submission by Rurban Estates Limited in relation to Land off Knelle Road in Robertsbridge, East Sussex, which is being promoted for residential development.
- 1.10.2 The proposals comprise the construction of up to 145 residential dwellings along with associated access, landscaping and open space.
- 1.10.3 Vehicular and pedestrian access to the site will be achieved via the upgrading of the existing agricultural access and the reprioritising of Knelle Road in favour of the development. A priority working system will be implemented on Knelle Road in order to maintain the existing footway infrastructure to its current high standard, as well as on-street parking capacity.
- 1.10.4 A review of the existing local pedestrian, cycle and public transport infrastructure has demonstrated that the site is afforded the opportunity for many everyday journeys to take place by active and sustainable travel modes, with a range of local services and facilities located within a reasonable distance and accessible via short journeys on public transport.
- 1.10.5 The proposed development has the potential to generate approximately 66 vehicle movements during the weekday AM peak hour, 68 movements during the PM peak hour, and 605 movements across the 12-hour daytime period (07:00-19:00). This

equates to approximately 50 movements per hour – or one movement per minute – on average.

- 1.10.6 These vehicle trips have been distributed and assigned to the local highway network using 2011 Census data. This has demonstrated that the residual impact the proposed development would have on local junctions and links is not expected to be 'severe' with reference to the key test set out at Paragraph 116 of the National Planning Policy Framework. Nevertheless, measures will be put in place to promote the use of sustainable modes of transport, such as the distribution of Travel Information Packs to new residents that will highlight the availability of local public transport services.
- 1.10.7 In summary, it has been demonstrated that the site represents a viable and sustainable location for development in transport planning terms.

APPENDIX

B





Proposed uncontrolled pedestrian crossing equipped with dropped kerbs and tactile paving over school junction

Carriageway widened to 5.5m

Proposed 5.5m wide access road with a 2m footway on its western side

Repriority provided into the development parcel, with a priority junction formed to serve the school

Russetts

Potential driveway for Russetts

Give way to oncoming vehicles signage to be provided (diagram no. 615)



Twynham

Approximate location of an existing parking area

Priority over oncoming vehicles signage to be provided (diagram no. 811A)



Carriageway widened to 5.5m

Kerbline tie-in

Homestead

3.7m

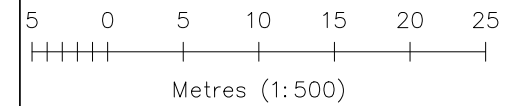
5.5m

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- Highway boundary
- Site boundary
- Third Party Agreement Land



REV	DATE	BY	DESCRIPTION	CHK	APD
P2	13.10.25	JM	Revised Boundary	JM	JM
P1	11.08.25	HL	First Issue	JM	JM

client
RURBAN ESTATES LIMITED

project
LAND OFF KNELLE ROAD, ROBERTSBRIDGE

title
PROPOSED ACCESS ARRANGEMENT

project 36508	drwg H-01	rev P2
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Drawn HL	Checked JM	Approved JM	scale @ A3 1:500	date 13.10.2025
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status FOR INFORMATION	P
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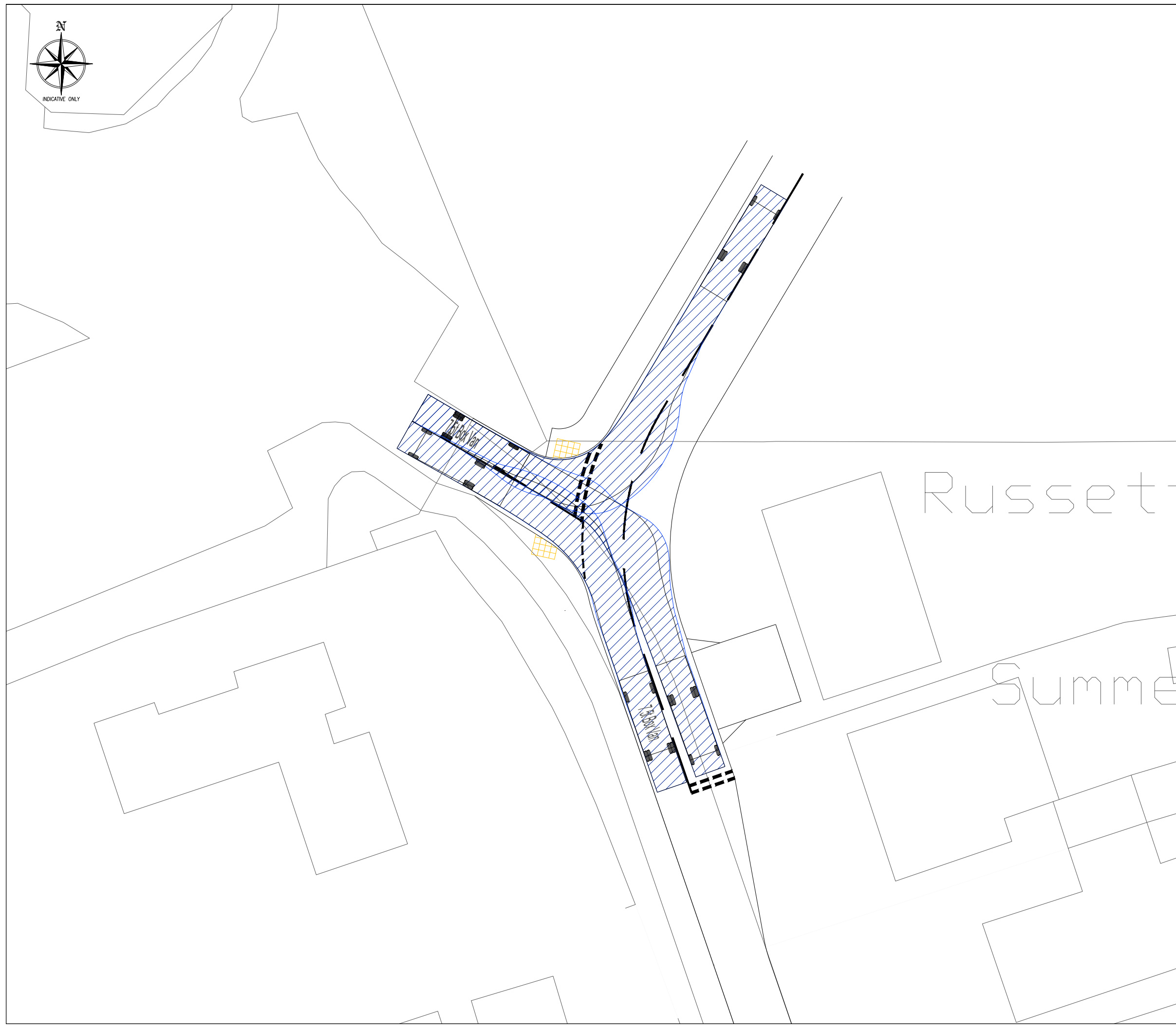


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CAD Reference: **A3**

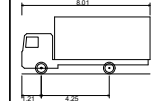


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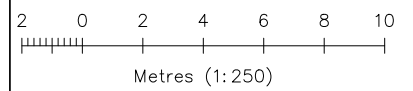


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7.5t Box Van
 Overall Length 8.010m
 Overall Width 2.100m
 Overall Body Height 3.550m
 Min Body Ground Clearance 0.351m
 Track Width 2.164m
 Lock to lock time 4.00s
 Kerb to Kerb Turning Radius 7.400m



REV	DATE	BY	DESCRIPTION	CHK	APD
P1	11.08.25	HL	First Issue	JM	JM

client
RURBAN ESTATES LIMITED

project
LAND OFF KNELLE ROAD, ROBERTSBRIDGE

title
**VEHICLE SWEEP PATH ANALYSIS
 7.5T BOX VAN**

project 36508	drwg T-02	rev P1
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Drawn HL	Checked JM	Approved JM	scale @ A3 1:250	date 11.08.2025
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status FOR INFORMATION	P
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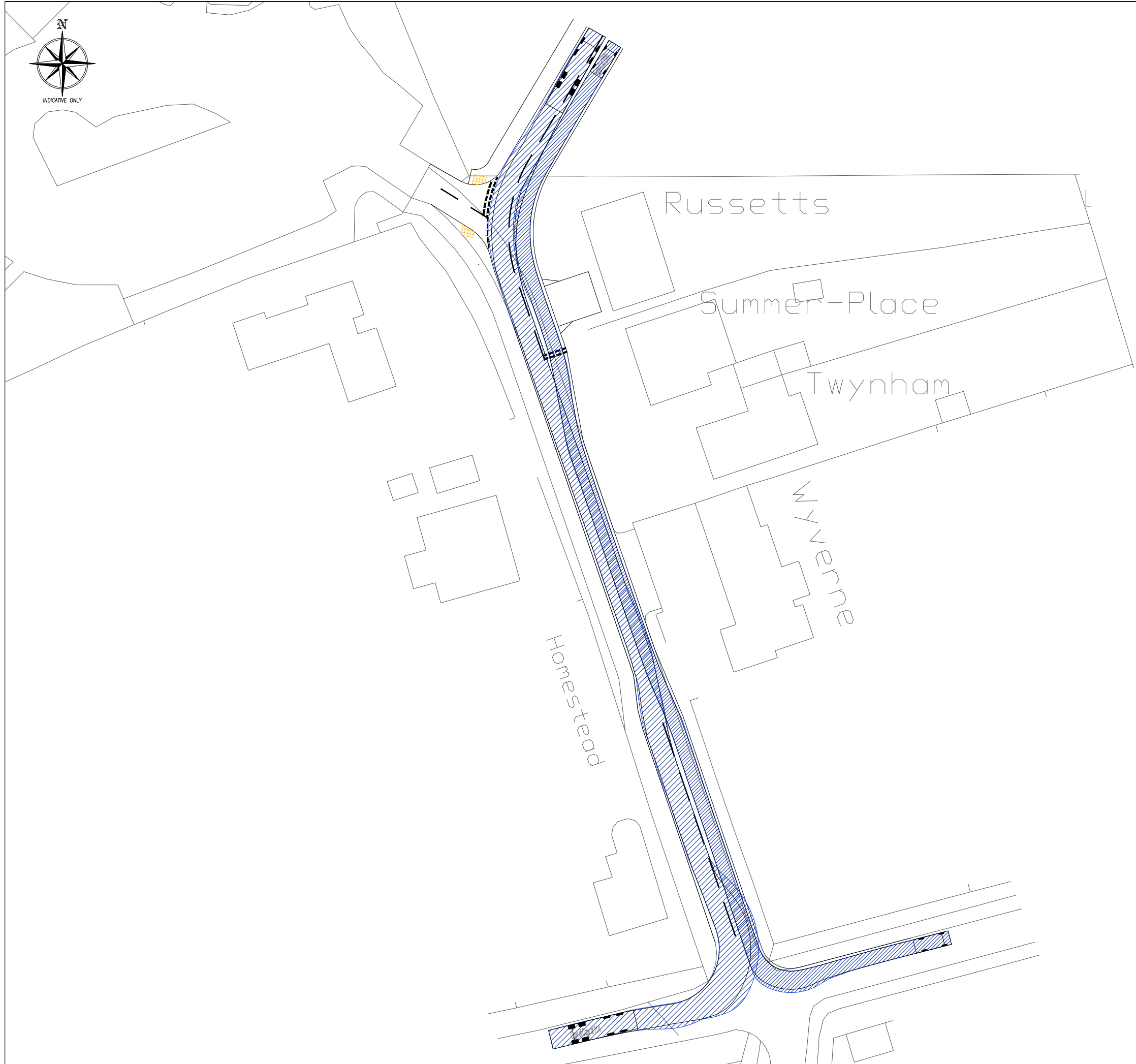


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CAD Reference: **A3**



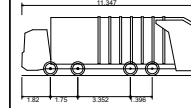
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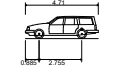
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11.4m Refuse Vehicle
 Overall Length 11.347m
 Overall Width 2.500m
 Overall Body Height 3.751m
 Min Body Ground Clearance 0.304m
 Track Width 2.500m
 Lock to lock time 6.00s
 Kerb to Kerb Turning Radius 11.350m



Estate Car (2006)
 Overall Length 4.710m
 Overall Width 1.804m
 Overall Body Height 1.442m
 Min Body Ground Clearance 0.207m
 Max Track Width 1.750m
 Lock to lock time 4.00s
 Kerb to Kerb Turning Radius 5.950m



Metres (1:500)

P1	11.08.25	HL	First Issue	JM	JM
REV	DATE	BY	DESCRIPTION	CHK	APD

client
RURBAN ESTATES LIMITED

project
LAND OFF KNELLE ROAD, ROBERTSBRIDGE

title
VEHICLE SWEEP PATH ANALYSIS PASSING

project	drwg	rev		
36508	T-01	P1		
Drawn	Checked	Approved	scale @ A3	date
HL	JM	JM	1:500	11.08.2025

status
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CAD Reference: **A3**

APPENDIX

C





Audit Code: 6a4e7cbb-689f-440a-9416-7d99efa6a57a

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use: 03 - RESIDENTIAL

Category: B - AFFORDABLE/LOCAL AUTHORITY HOUSES

Total Vehicles

Selected regions and areas:

03	SOUTH WEST		
	WL	WILTSHIRE	1 day
09	NORTH		
	FU	WESTMORLAND & FURNESS	1 day
13	MUNSTER		
	TI	TIPPERARY	1 day

This section displays the number of survey days per TRICS® sub-region in the selected set.



Audit Code: 6a4e7cbb-689f-440a-9416-7d99efa6a57a

Primary Filtering Selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter:	DWELLS
Actual Range:	1.6 to 2.4 (units:DWELLS)
Range Selected by User:	8 to 150 (units:DWELLS)
Parking Spaces Range:	11 - 220

Public Transport Provision:

Selection by:	All Surveys Included
Date Range:	01/01/13 to 05/09/23

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Friday	2 days
Tuesday	1 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	3
Direction ATC Count	0

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines

Selected Locations:

Neighbourhood Centre (PPS6 Local Centre)	1 days
Suburban Area (PPS6 Out of Centre)	2 days

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Residential Zone	2 days
Village	1 days

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Inclusion of Servicing Vehicle Counts:

Servicing vehicles Excluded	3 days
-----------------------------	--------



Audit Code: 6a4e7cbb-689f-440a-9416-7d99efa6a57a

Secondary Filtering Selection:

Use Class:

C3 3 surveys

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order (England) 2020 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 500m Range:

500 - 1500

Population within 1 mile:

1,001 to 5,000	1 surveys
5,001 to 10,000	2 surveys

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

25,001 to 50,000	1 surveys
5,000 or Less	1 surveys
5,001 to 25,000	1 surveys

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

1.1 to 1.5 3 surveys

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.



Audit Code: 6a4e7cbb-689f-440a-9416-7d99efa6a57a

Petrol filling station:

This data displays the number of surveys within the selected set that include petrol filling station activity, and the number of surveys that do not.

Travel Plan:

No 3 surveys

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present 3 surveys

This data displays the number of surveys within the selected set that include petrol filling station activity, and the number of surveys that do not.

COVID-19 Restrictions:

No

This data displays the number of surveys within the selected set that include petrol filling station activity, and the number of surveys that do not.



Audit Code: 6a4e7cbb-689f-440a-9416-7d99efa6a57a

TRIP RATE for Land Use 03 - RESIDENTIAL/B - AFFORDABLE/LOCAL AUTHORITY HOUSES

Total Vehicles

Calculation factor: 1 DWELLS

*BOLD print indicates peak (busiest) period

Time Range	No. Days	Ave. DWELLS	Arrivals	Departures	Totals
00:00-01:00					
01:00-02:00					
02:00-03:00					
03:00-04:00					
04:00-05:00					
05:00-06:00					
06:00-07:00					
07:00-08:00	3	54	0.086	0.288	0.374
08:00-09:00	3	54	0.141	0.264	0.405
09:00-10:00	3	54	0.141	0.282	0.423
10:00-11:00	3	54	0.110	0.141	0.251
11:00-12:00	3	54	0.098	0.117	0.215
12:00-13:00	3	54	0.141	0.086	0.227
13:00-14:00	3	54	0.147	0.110	0.257
14:00-15:00	3	54	0.147	0.172	0.319
15:00-16:00	3	54	0.233	0.166	0.399
16:00-17:00	3	54	0.313	0.160	0.473
17:00-18:00	3	54	0.319	0.196	0.515
18:00-19:00	3	54	0.252	0.202	0.454
19:00-20:00					
20:00-21:00					
21:00-22:00					
22:00-23:00					
23:00-00:00					
Total Rates:			2.128	2.184	4.312

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.

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Audit Code: 6a4e7cbb-689f-440a-9416-7d99efa6a57a

Parameter Summary:

Trip rate parameter range selected:	8 - 150 (units: DWELLS)
Survey date date range:	27/05/2016 - 13/05/2022
Number of weekdays (Monday-Friday):	3
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	0
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.



Audit Code: 364ae9d7-d16f-4d1b-b90a-2e3bceb0474a

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use: 03 - RESIDENTIAL

Category: A - HOUSES PRIVATELY OWNED

Total Vehicles

Selected regions and areas:

02	SOUTH EAST		
	ES	EAST SUSSEX	2 days
	KC	KENT	1 day
	WS	WEST SUSSEX	1 day
04	EAST ANGLIA		
	SF	SUFFOLK	1 day
09	NORTH		
	DH	DURHAM	1 day
	IM	ISLE OF MAN	3 days
12	CONNAUGHT		
	CS	SLIGO	2 days

This section displays the number of survey days per TRICS® sub-region in the selected set.



Audit Code: 364ae9d7-d16f-4d1b-b90a-2e3bceb0474a

Primary Filtering Selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter:	DWELLS
Actual Range:	0.86 to 8.11 (units:DWELLS)
Range Selected by User:	4 to 4334 (units:DWELLS)
Parking Spaces Range:	6 - 2696

Public Transport Provision:

Selection by:	All Surveys Included
Date Range:	01/01/16 to 17/09/24

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Friday	1 days
Monday	1 days
Thursday	5 days
Tuesday	4 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	11
Direction ATC Count	0

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines

Selected Locations:

Neighbourhood Centre (PPS6 Local Centre)	11 days
------------------------------------------	---------

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Residential Zone	1 days
Village	10 days

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Inclusion of Servicing Vehicle Counts:

Servicing vehicles Excluded	10 days
Servicing vehicles Included	1 days



Audit Code: 364ae9d7-d16f-4d1b-b90a-2e3bceb0474a

Secondary Filtering Selection:

Use Class:

C3 11 surveys

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order (England) 2020 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 500m Range:

72 - 1800

Population within 1 mile:

1,000 or Less	3 surveys
1,001 to 5,000	8 surveys

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

25,001 to 50,000	5 surveys
5,000 or Less	3 surveys
5,001 to 25,000	3 surveys

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

0.6 to 1.0	1 surveys
1.1 to 1.5	3 surveys
1.6 to 2.0	7 surveys

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.



Audit Code: 364ae9d7-d16f-4d1b-b90a-2e3bceb0474a

Petrol filling station:

This data displays the number of surveys within the selected set that include petrol filling station activity, and the number of surveys that do not.

Travel Plan:

No	9 surveys
Yes	2 surveys

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present	11 surveys
-----------------	------------

This data displays the number of surveys within the selected set that include petrol filling station activity, and the number of surveys that do not.

COVID-19 Restrictions:

No

This data displays the number of surveys within the selected set that include petrol filling station activity, and the number of surveys that do not.



Audit Code: 364ae9d7-d16f-4d1b-b90a-2e3bceb0474a

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

Total Vehicles

Calculation factor: 1 DWELLS

**BOLD print indicates peak (busiest) period*

Time Range	No. Days	Ave. DWELLS	Arrivals	Departures	Totals
00:00-01:00					
01:00-02:00					
02:00-03:00					
03:00-04:00					
04:00-05:00					
05:00-06:00					
06:00-07:00					
07:00-08:00	11	79	0.044	0.194	0.238
08:00-09:00	11	79	0.127	0.356	0.483
09:00-10:00	11	79	0.135	0.170	0.305
10:00-11:00	11	79	0.123	0.150	0.273
11:00-12:00	11	79	0.123	0.144	0.267
12:00-13:00	11	79	0.138	0.155	0.293
13:00-14:00	11	79	0.161	0.142	0.303
14:00-15:00	11	79	0.147	0.158	0.305
15:00-16:00	11	79	0.234	0.154	0.388
16:00-17:00	11	79	0.228	0.158	0.386
17:00-18:00	11	79	0.293	0.151	0.444
18:00-19:00	11	79	0.237	0.158	0.395
19:00-20:00					
20:00-21:00					
21:00-22:00					
22:00-23:00					
23:00-00:00					
Total Rates:			1.990	2.090	4.080

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

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Audit Code: 364ae9d7-d16f-4d1b-b90a-2e3bceb0474a

Parameter Summary:

Trip rate parameter range selected:	4 - 4334 (units: DWELLS)
Survey date date range:	27/10/2016 - 23/05/2024
Number of weekdays (Monday-Friday):	11
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	0
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

APPENDIX

5



TRANSPORT ADDENDUM

JOB REF.

JM/36508

CLIENT

Rurban Estates Limited

SITE

Land off Knelle Road, Robertsbridge

1.1 INTRODUCTION

- 1.1.1 DHA originally completed a Transport Technical Note (TTN) to support a call for sites submission to Rother District Council (RDC) by Rurban Estates in relation to Land off Knelle Road, in Robertsbridge, East Sussex, which is being promoted for residential development.
- 1.1.2 Since the original submission, an additional access plan has been completed in support of the development, demonstrating an alternative access arrangement. This includes land in the ownership of East Sussex County Council (ESCC) in lieu of the property named 'Russetts'. While the owners of the Russetts property remain agreeable to the principle of their ownership being included as part of the promoted land to facilitate an appropriate access (please refer to **Appendix A**), this second option demonstrates an alternative arrangement which is also considered deliverable subject to agreement with ESCC.
- 1.1.3 The land in the control of Rurban Estates has a unique relationship with Robertsbridge Community College; there is the potential to safeguard some of the adjacent land in favour of ESCC for educational expansion as part of any negotiations regarding any future rearrangement of the current accesses.

1.2 ALTERNATIVE ACCESS OPTION

- 1.2.1 As mentioned above, an alternative access option has been completed to demonstrate another technically deliverable solution, subject to ESCC agreement. The alternative access option can be found at **Appendix B**.
- 1.2.2 The revised access option primarily differs at the northern end of Knelle Road, where the previous design would curve within land under the ownership of the adjacent bungalow, 'Russetts'. The proposed design instead heads straight into the land parcel proposed for development.
- 1.2.3 To provide this access option, the existing school access would need to be realigned to provide a priority junction onto the proposed access road as demonstrated on the drawing, providing an appropriate pedestrian infrastructure

Kent

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including an uncontrolled pedestrian crossing over the priority junction. This junction realignment would require land within the ownership of East Sussex County Council, highlighted edged green on the drawing.

- 1.2.4 As has been noted in the previous TTN submitted, the 5.5m wide access road is sufficient to serve the development proposed, and the design presented is seen to be compliant with local and national design standards.

1.3 CONCLUSION

- 1.3.1 This addendum should be read in conjunction with the TTN submitted with the call for sites representation to Rother District Council for Land off Knelle Road, Robertsbridge.
- 1.3.2 The addendum provides an alternative access option using land under the control of East Sussex County Council, rather than the third party named 'Russetts'. The alternative access design is considered to meet the requirements of the proposed development, providing a safe and suitable access.
- 1.3.3 Rurban Estates are committed to working with RDC and ESCC and all stakeholders to deliver the optimal solution and to this extent welcome an open dialogue.

APPENDIX

A



Rother District Council – Planning Policy

By Email Only

Russetts,
Knelle Road,
Robertsbridge,
East Sussex,
TN32 5DY

9th March 2026

Dear Sir/Madam,

Subject: Russetts, Knelle Road, Robertsbridge, TN32 5DY ('Russetts') – Access & Land Assembly.

I write with the agreement of my father, Peter Wawne, the owner of *Russetts*, a bungalow located adjacent to the existing agricultural access serving land at Beech Farm, Knelle Road, Robertsbridge.

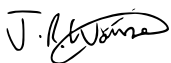
We understand that some of the adjoining land at Beech Farm is currently being promoted through the Regulation 18 consultation process as a potential site for future residential development.

We have been approached by the adjacent owners regarding the potential role our land could play in facilitating improved access arrangements to serve the site being promoted. We recognise that enhancements to the existing access could assist in delivering a suitable and safe access solution should the site be allocated for development in the future.

In this context, we confirm that we are supportive of engaging constructively with the owners of Beech Farm, the site promoters and the Council regarding the potential inclusion of our property within a wider land assembly, should this be required to facilitate appropriate access improvements. We are positively disposed to working collaboratively with the relevant parties to explore how our land could assist in delivering an appropriate and safe access solution to serve the adjacent site. We would be willing in principle to see our property incorporated within such arrangements and do not object to the promotion of the adjoining land for development. Our intention is to engage positively and pragmatically with the relevant parties to ensure that, should the site be taken forward through the Local Plan process, land ownership matters would not represent a barrier to the delivery of an appropriate access solution, subject to appropriate commercial terms being agreed. Our intention in writing is simply to confirm that we are supportive of ongoing discussions and are not opposed in principle to our property being considered as part of a future access solution, should the site progress through the Local Plan process.

We trust this assists the Council in understanding that there is a willingness from the neighbouring ownership to engage positively in helping to facilitate an appropriate access solution for the site.

Yours faithfully,



James Wawne

jwawne@gmail.com

TRANSPORT ADDENDUM

JOB REF.

JM/36508

CLIENT

Rurban Estates Limited

SITE

Land off Knelle Road, Robertsbridge

1.1 INTRODUCTION

- 1.1.1 DHA originally completed a Transport Technical Note (TTN) to support a call for sites submission to Rother District Council (RDC) by Rurban Estates in relation to Land off Knelle Road, in Robertsbridge, East Sussex, which is being promoted for residential development.
- 1.1.2 Since the original submission, an additional access plan has been completed in support of the development, demonstrating an alternative access arrangement. This includes land in the ownership of East Sussex County Council (ESCC) in lieu of the property named 'Russetts'. While the owners of the Russetts property remain agreeable to the principle of their ownership being included as part of the promoted land to facilitate an appropriate access (please refer to **Appendix B**), this second option demonstrates an alternative arrangement which is also considered deliverable subject to agreement with ESCC.
- 1.1.3 The land in the control of Rurban Estates has a unique relationship with Robertsbridge Community College; there is the potential to safeguard some of the adjacent land in favour of ESCC for educational expansion as part of any negotiations regarding any future rearrangement of the current accesses.

1.2 ALTERNATIVE ACCESS OPTION

- 1.2.1 As mentioned above, an alternative access option has been completed to demonstrate another technically deliverable solution, subject to ESCC agreement. The alternative access option can be found at **Appendix A**.
- 1.2.2 The revised access option primarily differs at the northern end of Knelle Road, where the previous design would curve within land under the ownership of the adjacent bungalow, 'Russetts'. The proposed design instead heads straight into the land parcel proposed for development.
- 1.2.3 To provide this access option, the existing school access would need to be realigned to provide a priority junction onto the proposed access road as demonstrated on the drawing, providing an appropriate pedestrian infrastructure

including an uncontrolled pedestrian crossing over the priority junction. This junction realignment would require land within the ownership of East Sussex County Council, highlighted edged green on the drawing.

- 1.2.4 As has been noted in the previous TTN submitted, the 5.5m wide access road is sufficient to serve the development proposed, and the design presented is seen to be compliant with local and national design standards.

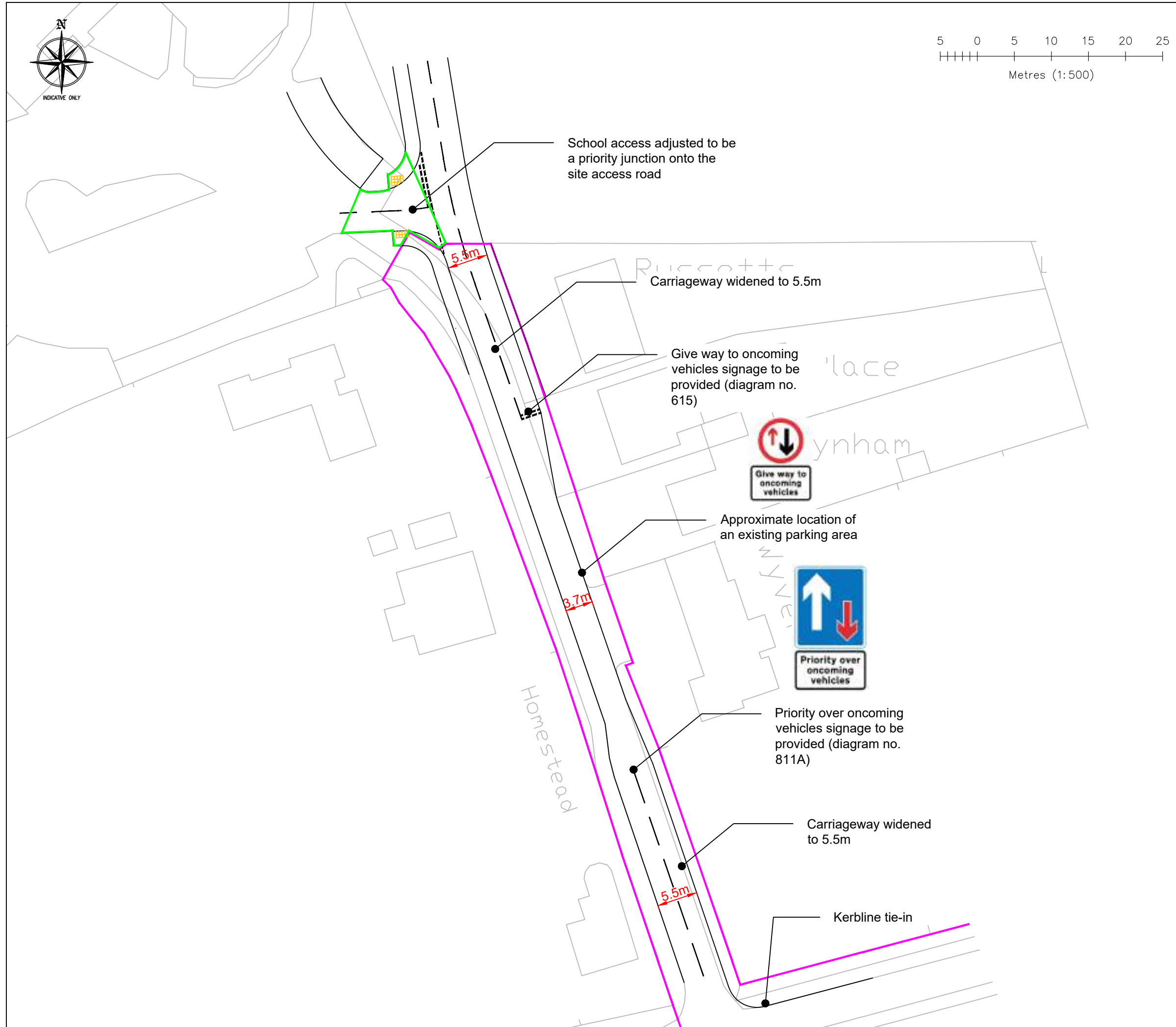
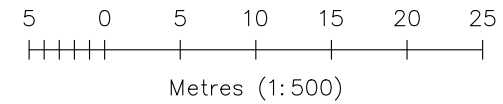
1.3 CONCLUSION

- 1.3.1 This addendum should be read in conjunction with the TTN submitted with the call for sites representation to Rother District Council for Land off Knelle Road, Robertsbridge.
- 1.3.2 The addendum provides an alternative access option using land under the control of East Sussex County Council, rather than the third party named 'Russetts'. The alternative access design is considered to meet the requirements of the proposed development, providing a safe and suitable access.
- 1.3.3 Rurban Estates are committed to working with RDC and ESCC and all stakeholders to deliver the optimal solution and to this extent welcome an open dialogue.

APPENDIX

B





ONLY SCALE FOR PLANNING PURPOSES

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- █ Extent of highway maintained land
- █ Extent of access construction within Robertsbridge Community College ownership

P1	13.03.26	JM	First Issue	JM	JM
REV	DATE	BY	DESCRIPTION	CHK	APD

client
RURBAN ESTATES LIMITED

project
LAND OFF KNELLE ROAD, ROBERTSBRIDGE

title
**ALTERNATIVE ACCESS ARRANGEMENT
ROBERTSBRIDGE COMMUNITY COLLEGE**

project	drwg	rev		
36508	H-02	P1		
Drawn	Checked	Approved	scale @ A3	date
JM	JM	JM	1:500	13.03.2026

status
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CAD Reference: **A3**

APPENDIX

6



LDÄDESIGN

Land North of Knelle Road, Robertsbridge, East Sussex

Landscape and Visual Appraisal

March 2026

Issue Sheet

Report Prepared for: **Rurban Estates**

Land North of Knelle Road, Robertsbridge, East Sussex

Prepared by: LDA Design			
Revision	Date:	Technical Lead:	Comments:
Draft 1.0	12 March 2026	NAtk, PL	First Draft for Review
Final 2.0	19 March 2026	NAtk, PL	Final for Submission

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1. Introduction

- 1.1.1. This document sets out the preliminary findings and recommendations of the **Landscape and Visual Appraisal** ('LVA') that has been undertaken in support of the promotion of the proposed residential development at the *Land North of Knelle Road, Robertsbridge, East Sussex* ('the Site').
- 1.1.2. The purpose of this document is to consider the ability of the Site and its context to accommodate new residential development; identify the potential landscape and visual effects arising from the Proposed Development; and highlight opportunities to mitigate and avoid potential adverse effects; and bring forward local landscape enhancements where possible.
- 1.1.3. The LVA has been undertaken by LDA Design, the appointed landscape architects for Rurban Estates (who are the promoter of the Site).
- 1.1.4. This LVA accompanies the representation submitted to Rother District Council ('RDC') during the latest period of Regulation 18 Consultation on the recently published ***Development Strategy and Site Allocations*** (draft).
- 1.1.5. Full-size copies of all figures in this document are appended in **Appendix 1**.

2. Landscape Policy & Designations

2.1. Landscape Planning Policy

2.1.1. The Site is located within the local planning authority of RDC. This section therefore reports on the current adopted development plans for the determining authority and identifies the policies relevant to the Site and its surroundings.

2.1.2. RDC is currently preparing a new Local Plan and undertook a high-level Regulation 18 consultation in the first quarter of 2024/25. This representation is submitted as part of the latest round of consultation on the **Rother Local Plan 2025-2042 – Development Strategy and Site Allocations Draft (Regulation 18) Version January 2026: Proposed Site Allocations**. The Site not considered in this draft RDC document.

2.1.3. The current adopted development plans for the area comprise the following:

- **Rother Local Plan Core Strategy** (adopted 29th September 2014) and
- Development and Site Allocations Development Plan Document (adopted December 2019).

2.1.4. The policies within these documents that are pertinent to the purpose of this LVA are listed below for reference. **Appendix 2 Relevant Local Planning Policies** outlines with more detail policies that has been consider in this report.

Rother Local Plan Core Strategy (2014)

- Policy OSS2: Use of Development Boundaries
- Policy OSS3 Location of Development
- Policy OSS4 General Development Considerations
- Policy EN1 Landscape Stewardship
- Policy EN3 Design Quality
- Policy EN5 Biodiversity and Green Space

Development and Site Allocations Development Plan Document (2019)

- Policy DEN1 Maintaining Landscape Character
- Policy DEN2 The High Weald Area of Outstanding Natural Beauty (AONB)

2.2. Landscape Designations

2.2.1. The Site is located within the **High Weald National Landscape** – a nationally protected landscape recognised for its unique and historic character – adjoining the settled area of Robertsbridge.

2.2.2. RDC, along with other public bodies and statutory undertakers, have a legal duty under Section 85 of the Countryside and Rights of Way Act 2000 to seek to

further the purposes (to conserve and enhance the natural beauty) of the National Landscape.

2.2.3. RDC, along with other public bodies and statutory undertakers, have a legal duty under Section 85 of the Countryside and Rights of Way Act 2000 to seek to further the purposes (to conserve and enhance the natural beauty) of the National Landscape.

2.2.4. The **High Weald AONB Management Plan 2024-2029** defines what is meant by 'natural beauty' in the High Weald, setting objectives for the management of the area. The Plan is adopted by all 15 councils with land in the High Weald (including RDC) and is a 'material consideration' in all planning applications. Several supporting publications provide guidance on how to conserve and enhance the landscape of the National Landscape; help understanding its 'natural beauty' and how proposals can respond to their surroundings.

2.2.5. The Natural Beauty Indicators of the High Weald, for the Site and its context, are summarised below.

- **Natural Systems (Geology, Soils, Water and Climate):** The High Weald National Landscape is characterised by a deeply incised, ridged and faulted landform of clays and sandstone creating soils which are highly variable over short distances. The ridges tend east-west, and from them spring numerous gill streams that form the headwaters of rivers. Wide river valleys dominate the eastern part of the National Landscape. The landform and water systems are subject to, and influence, a local variant of the British sub oceanic climate.
- **Settlement:** The High Weald National Landscape is characterised by dispersed historic settlements of farmsteads, hamlets, and late medieval villages and market towns founded on trade and non-agricultural rural industries. The landscape setting of these settlements underpins the distinct and picturesque small-scale landscape character, with rolling pastures and small ancient woodlands of the countryside interspersed with the rich clay-tiled roofscapes of historic buildings.
- **Routeways:** The High Weald National Landscape is characterised by historic routeways (now roads, tracks, bridleways and paths), the oldest being in the form of ridge-top roads and a dense system of radiating droveways. These are often narrow, deeply sunken and edged with trees, hedges, wildflower-rich verges and boundary banks. These locally distinctive lanes and rights of way often display quietness and rurality in their visual and perceptual character, and they are valuable green infrastructure, creating high public accessibility within the National Landscape and good connections between settlements.

- **Woodland:** The High Weald National Landscape is characterised by the great extent of woodland including ancient woods, gills and shaws, the product of traditional long-term management. The nationally important assemblage of ancient woodland in the High Weald has immense wildlife, landscape and historical value, while the wider cumulative visual character of trees and hedgerows dividing small irregular fields is fundamental to the verdant nature and appearance of the landscape.
- **Fieldscape and Heath:** The High Weald National Landscape is characterised by an intricate and scenic mosaic of small, irregularly shaped and productive fields often bounded by hedgerows, shaws and small woodlands and in-field trees, and typically used for livestock grazing and small-scale horticulture; within which can be found distinctive zones of lowland heath and inned / reclaimed river valleys. Predominantly undisturbed and highly productive Grade 3 good agricultural grazing land, reflecting the typical and historic agricultural practices of the area, and as such is intrinsically valuable to the landscape character.
- **Dark Skies:** The High Weald National Landscape is characterised by having some of the darkest skies in the south-east of England. This gives the National Landscape a sense of remoteness and peacefulness and connects the natural environment to the cultural and historic landscape.
- **Aesthetic and Perceptual Qualities:** Aesthetic and perceptual qualities are sense based and are experienced as a result of people's interaction with natural beauty and their immersion in it, within the High Weald's landscape.
- **Land-based Economy and Rural Living:** The High Weald National Landscape is characterised by a broad-based economy but with a significant land-based sector and related community life focused on mixed farming (particularly family farms and smaller holdings), woodland management and rural crafts.

2.2.6. Key considerations for housing development in the National Landscape are set out in **Section 4 Responding to the Site and its landscape context**.

2.2.7. No other statutory or non-statutory designated landscapes, protected at a local district level, have been identified within or near the Site.

3. The Site and its Landscape Context

3.1. Landform, Landcover and Settlement Pattern

3.1.1. **Figure 1** illustrates the location of the Site within its local context on the northern edge of Robertsbridge.



Figure 1: The Site and its Local Context

3.1.2. Robertsbridge is a large, nucleated village located in the north-western part of Rother District within the *High Weald National Landscape*. It lies within a predominantly rural landscape approximately 18–20 km north of the coastal towns of Bexhill and Hastings, in a transitional area between the Lower and Upper Rother Valley landscape character areas.

3.1.3. The historic core of the village occupies a gently sloping valley side descending towards the floodplain of the River Rother. Unlike many settlements within the High Weald that occupy elevated ridgelines, Robertsbridge developed at a point where the main river corridor is joined by several tributary streams. The Darwell Stream flows through the settlement and forms a clear physical division between the historic core and later twentieth-century development and railway infrastructure to the west, upon the rising and elevated landform. The northern parts of the village – along the High Street / Northbridge Street – extend onto

the valley floor, establishing a close relationship between the settlement and the river landscape and its associated tributaries, as shown on **Figure 2: Landform**.

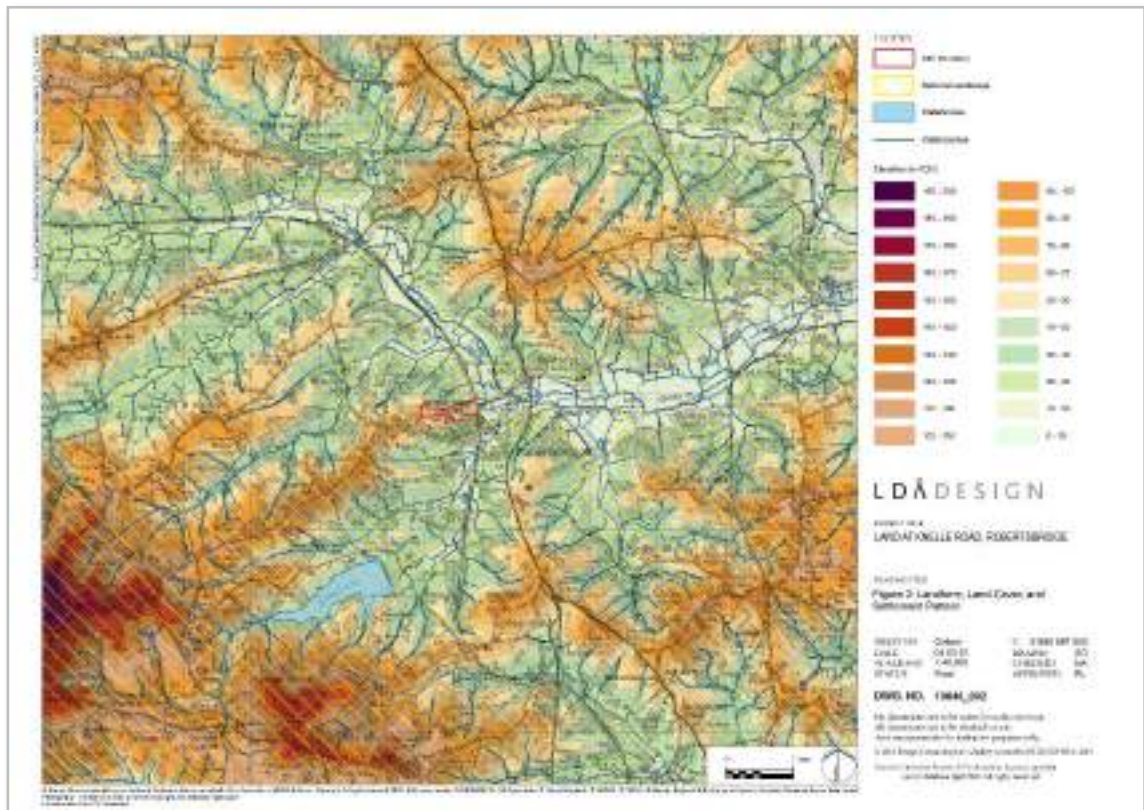


Figure 2: Landform

- 3.1.4. The surrounding landform (beyond Robertsbridge) provides a degree of visual containment, limiting wider visibility of much of the settlement within the broad valley landscape. Within the historic core there is a sense of enclosure, with only occasional glimpses of the wooded ridges that characterises the wider landscape. The *Conservation Area Appraisal: Robertsbridge and Northbridge Street*¹ notes that the historic settlement exhibits a largely 'introverted' character, with much of the built form concealed until entry into the village. The local topography reflects the underlying geology of the Hastings Beds, including Tunbridge Wells Sand, Wadhurst Clay and Ashdown Sand, which historically provided materials for local building construction alongside the abundant timber resources characteristic of the High Weald.
- 3.1.5. Robertsbridge has historically benefitted from strong transport connections. In the nineteenth century two railway lines were established along the valley floor: the Hastings–London line and the Kent and East Sussex Railway (now largely disused). The village continues to be served by the Hastings–London railway line and is bypassed to the east by the A21 trunk road.

¹ Rother District Council, *Conservation Area Appraisal: Robertsbridge and Northbridge Street* (2009). Available online at <https://www.rother.gov.uk/planning-and-building-control/conservation-and-design/conservation-areas/data/>

3.2. The Site

Refer to **Figure 1** and **Figure 3**.

3.2.1. The Site comprises a series of four small-scale field parcels, encompassing approximately 12.80 hectares ('ha'). It is enclosed by established vegetation comprising mature trees and a dense shrub understory. A single Public Rights of Way ('PRoW') runs through the easternmost field of the Site, on a north-south alignment, alongside the Hastings to London railway line. A tributary of the River Rother is also located in this field.

3.2.2. The **Site's northern boundary** comprises established vegetation, including mature trees and a dense shrub understory. Northward views from within the Site's elevated landform offer visibility to the rising landform on the far side of the broad valley, as shown in **Plate 1**.



Plate 1: View northwards to the northern boundary (Viewpoint A)

3.2.3. The **Site's eastern boundary** is formed by two separate fields. The northeastern boundary is defined by the post and rail fencing that lines the toe of the vegetated railway embankment of the Hastings–London railway line. Vegetation comprises a mixture of mature trees and shrub along associated small-scale drainage systems, as shown in Plate 2.



Plate 2: View southwards to the northeastern boundary (Viewpoint B)

3.2.4. The southeastern boundary is marked by the boundary treatments of the rear of adjoining dwellings located on Bellhurst Road and Langham Road. There is a notable lack of vegetation along these boundaries, as shown on **Plate 3**.



Plate 3: View eastwards towards the south / eastern boundary (Viewpoint C)

- 3.2.5. The **Site's southern boundary** comprises the aforementioned boundary treatments of the rear of adjoining dwellings located on Langham Road and the fenced boundary of Robertsbridge Community College, see **Plate 3** and **Plate 4**.



Plate 4: View southwards to the southern boundary with Robertsbridge Community College (Viewpoint A)

- 3.2.6. The **Site's western boundary** adjoins Bugsell Lane, which is flanked on both sides by a mature and well-established hedgerow. A few individual dwellings are located along it, as shown on **Plate 5**.



Plate 5: View westwards to the western boundary (Viewpoint A)

- 3.2.7. Overall, the Site is visually enclosed by several natural features, and views to it are generally confined to its local context. Some views are available from further afield, where views to the localised ridgeline, upon which Robertsbridge is situated, are visible. However, such opportunities are relatively limited from public locations to a few elevated vantage points in the surrounding landscape. The Site is contiguous with the defined settlement boundary of Robertsbridge and is influenced by both the adjoining urban and rural areas.
- 3.2.8. An analysis of the Site and its surrounding landscape character and visual environment are presented and analysed in more detail the following sections.

3.3. Landscape Character

- 3.3.1. The **East Sussex County Landscape Assessment** (2016) ('ESLCA) provides a consistent, county-wide framework for understanding and evaluating the unique combination of landscape, biodiversity, geological, cultural, and economic features that define each character area. Its objectives are to identify the distinct qualities of the county's landscapes, highlight pressures and challenges, formulate a vision for each area, and establish landscape action priorities to guide future management.
- 3.3.2. The LCA also includes guidelines for managing landscape change, linking the vision and strategy for each character area to planning and development decisions. These guidelines summarise the key attributes, management priorities, and opportunities to enhance multiple benefits through landscape management. Where character areas overlap with designated landscapes, such as the *High Weald National Landscape*, reference is made to their statutory management plans to ensure consistency and protection.
- 3.3.3. The Site falls within **6 Upper Rother Valley**, the condition of which is reported as follows:

Landscape Evaluation:

This is a largely unspoilt and tranquil rural landscape with few intrusive features. The landscape is in generally good condition and well managed as farmland with a strong historic structure. The lack of main roads and large settlements in the heart of the area means that it retains a relative remoteness. Agricultural change and diversification has led to some fragmentation of farmsteads. There is evidence of creeping suburbanisation around the villages and on country estates which detracts from local distinctiveness. 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. Woodlands have been affected by lack of traditional coppice management, rhododendron invasion and coniferisation.

- 3.3.4. Furthermore, the ESLSA describes the *Upper Rother Valley's* key landscape characteristics and positive landscape attributes, the relevant aspects of which can be summarised as being a landscape defined by the broad valley of the River Rother, characterised by prominent ridges and spurs that provide expansive views across one of the largest valley systems in the High Weald. The valley floor is relatively open with a small, winding river that frequently floods, while surrounding slopes contain a mix of larger intensively farmed fields and smaller historic field patterns. The landscape is well-wooded, characterised by linear

ghyll woods, larger woodland blocks and extensive areas of ancient semi-natural woodland, with species including chestnut, oak, hornbeam, larch and pine.

- 3.3.5. Settlement is typically dispersed with nucleated historic villages such as Mayfield, Robertsbridge and Wadhurst, alongside scattered farmsteads, cottages and dwellings connected by a network of winding sunken lanes. Traditional architecture reflects locally sourced materials, including timber framing, sandstone, red brick and clay tiles. The landscape also retains historic features such as farm ponds and hammer ponds associated with the area's iron industry, contributing to a distinctive, picturesque and often remote rural character.
- 3.3.6. The ESLCA's descriptions support observations made during the field undertaken in relation to this LVA. A copy of the published key landscape characteristics and positive landscape attributes for the *Upper Rother Valley* are appended in **Appendix 2** for reference.
- 3.3.7. RDC most recent ***Housing and Economic Land Availability Assessment*** (HELAA), published in January 2026, identifies the Site (comprising HELAA sites SAL0047 and SAL0025) as forming *"...a contiguous section of rolling, open countryside north of Robertsbridge, and includes several medieval assarts..."*, located to the *"...north of the topographical ridgeline that holds the village to the south."* The HELAA further states that *"...the western half of the site is an isolated area of countryside that does not adjoin the built form of the village, being separated by the school's playing fields and an area of woodland along the far western boundary."*
- 3.3.8. RDC's observations are partially aligned with the findings of the LVA fieldwork. It is agreed that the Site forms part of a contiguous tract of rolling, open countryside located to the north of Robertsbridge and the associated topographical ridgeline. However, the characterisation of the village as being wholly contained to the south of this ridgeline is not fully representative of the existing settlement pattern. As can be seen across **Figures 1 and 2**, the northern extent of built development associated with Robertsbridge extends beyond the ridgeline, including residential cul-de-sacs such as Oakland Drive and Hackwood. While these areas are visually contained by surrounding woodland, they nonetheless represent a discernible extension of the settlement envelope to the northside of ridgeline.
- 3.3.9. In this context, it is judged that the northern settlement edge is spatially more varied and extensive than implied within the HELAA. This reflects the historical evolution of Robertsbridge, which has expanded from its origins along the River Rother, with subsequent growth evident along Northbridge Road and extending westwards along the local ridgeline. Historically belonging to a network of medieval assarts broadly to the west of the River Rother and the original

settlement extent of Robertsbridge, the Site was formed from two larger field parcels, see **Plate 6**.

- 3.3.10. Over time the Site's original two fields have been eroded by development as Robertsbridge expanded westwards, with further division of the remaining field parcels. **Plate 7** shows the difference between historic ordnance survey mapping and aerial view today.

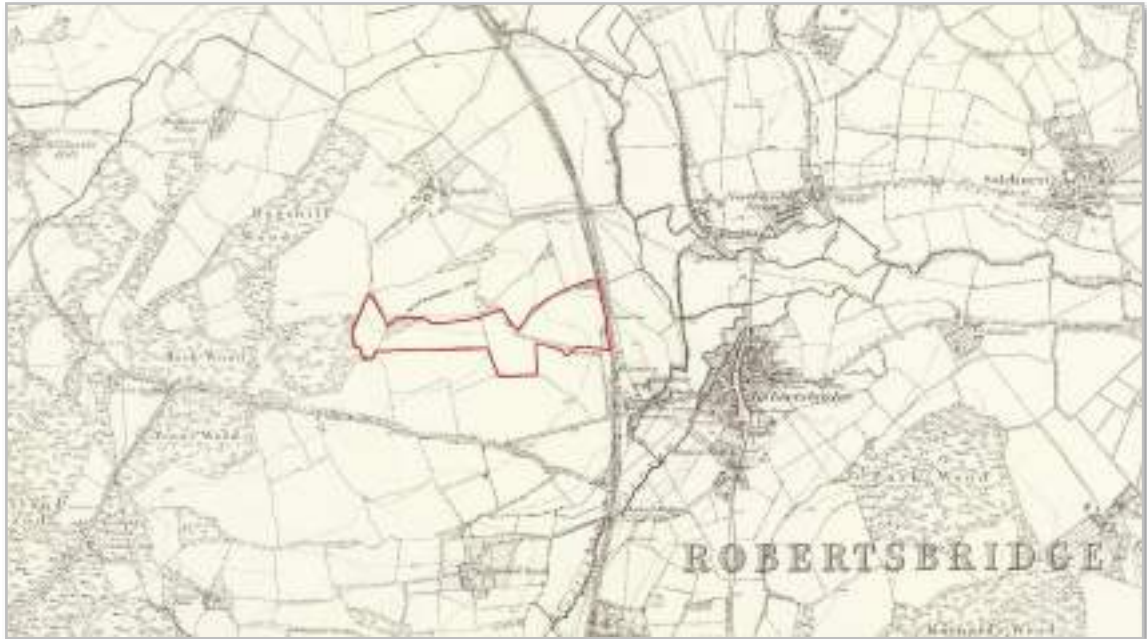


Plate 6: Approximate location of the Site on the 'Ordnance Survey Maps - Six-inch England and Wales, 1842-1952'²



Plate 7: Comparison between the 'Ordnance Survey Maps - Six-inch England and Wales, 1842-1952'³ and 2026

² Reproduced with the permission of the *National Library of Scotland*.

³ Reproduced with the permission of the *National Library of Scotland*.

- 3.3.11. Bearing this in mind, LDA Design consider that the Site and its existing features present an opportunity to integrate both new and existing residential development sympathetically within its surroundings, without adversely affecting the wider landscape character.
- 3.3.12. In support of this approach, the ESLCA provides guidance for managing change within each character area, including consideration of development pressures such as housing. In particular, the ESLCA makes clear that any new development should respond positively to the key attributes of the landscape and proactively contribute to the aims of the Landscape Change Strategy for this character area.
- 3.3.13. Therefore, it is essential to preserve and enhance existing on-site features, including field boundaries, which should be reinforced through additional planting. The on-site tree belts and vegetation should also be carefully protected and further enhanced through targeted enhancement planting, thereby supporting and strengthening the prevailing character that defines this part of Robertsbridge's landscape.
- 3.3.14. This approach aligns with the ESLCA vision for the *Upper Rother Valley*, which seeks to conserve the “...remote, tranquil and predominately rural landscape of rolling typical high wealden countryside...” and ensure that the “...character of existing settlements [is] retained and new development [is] controlled with the highest quality vernacular design and spatial planning.”
- 3.3.15. Where relevant, proposals within the Site should also respond to the *Upper Rother Valley* Landscape Strategy by:
- Protecting and managing existing habitats, including planning for restoration of ditches, riverside vegetation and tree cover to restore habitat linkages and continuity.
 - Protecting and managing the remote qualities of the river valleys.
 - Creating a multifunctional green infrastructure to enhance biodiversity on-site and provide recreational opportunities to connect to the wider wooded landscape.
 - Ensuring the design and layout of new development respects the character and form of the landscape and existing settlements.
 - Integrating proposed development into the landscape through planting of tree features and woodland to define the town and village boundaries with the countryside.
 - Selecting appropriate planting species to maintain landscape character, enhance biodiversity, and allow adaptation to climate change.

3.3.16. Furthermore, the ESLCA states that proposals within the *High Weald National Landscape* need to have regard for the current **High Weald Management Plan**⁴, recognising the development pressures within this character area. In this context, it makes clear that any new development should respect the key positive landscape attributes documented in the ESLCA, alongside consideration of opportunities for proactively meeting the Landscape Change Strategy outlined in the same publication.

3.4. Visual Environment

3.4.1. A preliminary Zone of Theoretical Visibility ('ZTV'), illustrated in **Figure 3**, indicates that while the Site is positioned on elevated ground and could potentially be visible from surrounding areas, it is generally well-contained visually. This containment is attributed to the prevalent wooded character of the landscape and its undulating topography which help screen intervisibility in all directions.

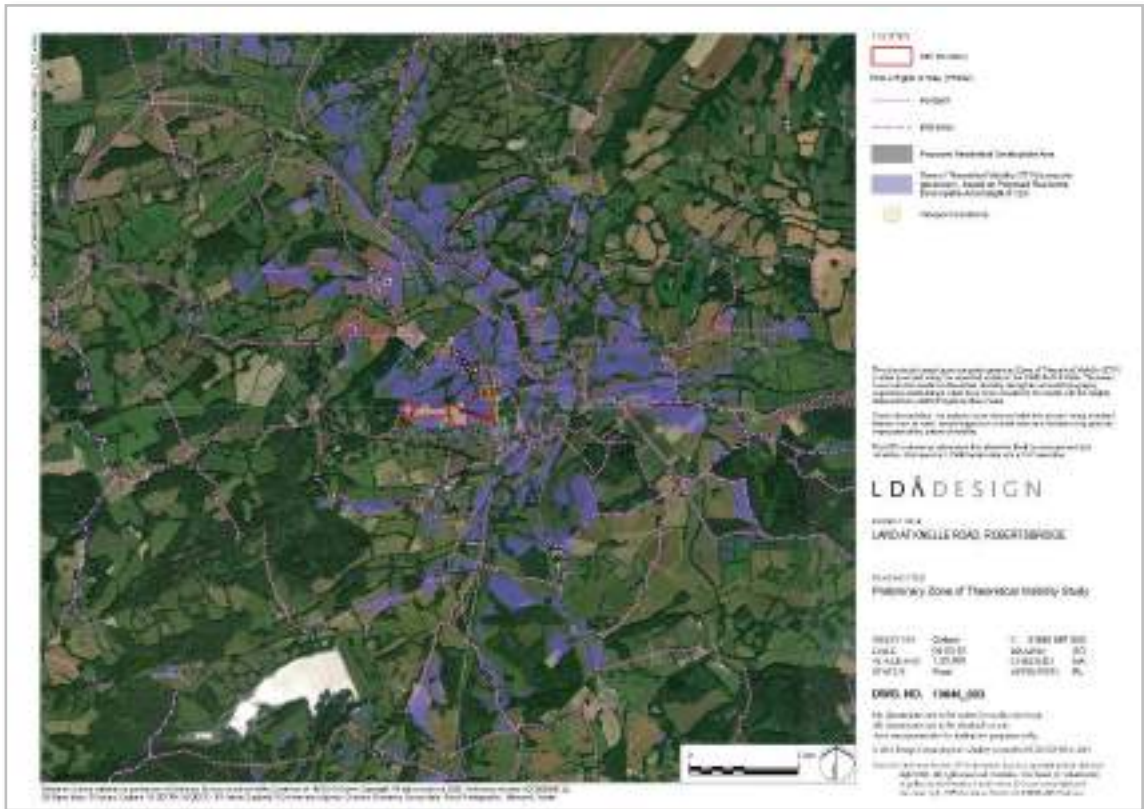


Figure 3: Preliminary Zone of Theoretical Visibility Study

⁴ Available online at: <https://highweald.org/aonb-management-plan/>

- 3.4.2. Visibility of the Site and its proposals are described below.
- 3.4.3. **To the north and east:** Visibility of the Site would be possible from several locations to the north, notably from elevated landform forming part of the broad valley landscape to the north of Robertsbridge. The Site's position on elevated ground, combined with the elevation of land to the north and east, results in potential intervisibility between these areas, as shown by **Plate 8**.



Plate 8: View from public footpath 'Salehurst and Robertsbridge 17' (Viewpoint D)

- 3.4.4. However, where field boundary vegetation (in the surrounding landscape) is mature and more continuous, which is notable further north and east from the Site, intervisibility would be more restricted. Where longer-range views in the direction of the Site are possible, it would be seen within the wider context of the settlement edge of Robertsbridge.



Plate 9: View from public footpath 'Etchingam 7' (Viewpoint E)

- 3.4.5. **To the south:** Visibility is theoretically possible from parts of the surrounding landscape, both near to the Site and from elevated viewpoints further afield although it would be fragmented, as indicated by the ZTV. The principal area of potential visibility occurs from the rising landform between Scaland Wood (to the west) and the railway line (to the east), within approximately 1 – 1.5km of the Site (see **Plate 10**). Although the ZTV identifies potential visibility in northward views, it is anticipated that at this distance on-the-ground visibility would generally be limited to locations where breaks occur in intervening vegetation or where vegetation is maintained at a low height. Where glimpsed views occur, the Proposed Development would be perceived in the context of the western part of Robertsbridge, which is already visible on the rising landform within the valley landscape across the narrow valley.



*Plate 10: View from public footpath 'Salehurst and Robertsbridge 40'
(Viewpoint F)*

- 3.4.6. **To the west:** Visibility from this direction would be limited due to the prevalence of mature woodland and the undulating topography of the surrounding landscape, which combine to restrict views towards the Site.
- 3.4.7. It should be borne in mind that the ZTVs represents a theoretical model of the Proposed Development's potential visibility, which at this stage of the Project is based on assumed building heights of 12m above existing ground levels. Therefore, the ZTV only gives an impression of the potential scheme's extent of the visibility. In reality, due to the resolution of the digital surface model used in the ZTV, some localised features (such as walls, low hedgerows and small trees) are not captured within the dataset used at the time of this appraisal. Consequently, the extent of visibility experienced on-the-ground would be less than suggested by the ZTV as these unaccounted localised features combine to screen the Proposed Development to a greater degree.
- 3.4.8. Overall, despite the Site's elevated position on the slopes of a valley, established natural features, such as woodlands, tree belts, hedgerows and shrubs, combined with an undulating landform, would restrict the Proposed Development's visual impact on the wider landscape as a consequence of the degree of visual enclosure.
- 3.4.9. The proposals should therefore seek to preserve and enhance the existing landscape features within the Site and its surroundings in order to ensure any development within the Site is well integrated into its surroundings and effectively screened from the wider landscape.

4. Responding to the Site and its landscape context

- 4.1.1. The Proposed Development will inevitably transform the Site from a series of grassland fields into a new built environment, altering its current land use and character. This change could initially be perceived as adversely affecting sensitive parts of the receiving landscape.
- 4.1.2. Currently, the Site's surroundings are characterised by a largely unspoilt and tranquil rural landscape with few intrusive features. The landscape is in generally good condition and well managed as farmland. The lack of main roads and large settlements in the area means that it retains a relative remoteness. This pattern is typical of the medieval field systems that are characteristic of the *High Weald National Landscape*.
- 4.1.3. However, the character of Site is also influenced by the existing urban area of Robertsbridge. Furthermore, built form is already apparent from within the surrounding landscape because of its location of the rising landform, with settlement located on higher ground typical of the wider landscape.
- 4.1.4. Furthermore, despite topography, the Site is visually well contained. It is anticipated that any visual effects on views and surroundings would primarily affect the Site and its local surroundings to the north, reducing with distance from the Site's extents, with consideration of the emerging concept layout and landscape strategy.
- 4.1.5. Therefore, it is considered that the Site has capacity to accommodate a scheme that is sensitively designed and sympathetic to its surrounding character and visual environment, without any undue effects on existing landscape and / or visual resources. Should the Proposed Development be visible in the wider context during the day and/or night, it will be perceived as part of the broader Robertsbridge settlement, with established vegetation in and around the Site acting as natural visual buffers to nearby receptors.
- 4.1.6. Nonetheless, it remains important for the design of the Proposed Development to carefully address landscape and visual considerations to mitigate potential impacts. This sensitive integration will reinforce the distinct identity of surrounding communities while safeguarding the rural landscape character and broader settlement pattern of the locality.

4.2. Design Recommendations for a Landscape-led scheme

- 4.2.1. The Site presents an opportunity to deliver a landscape-led scheme that would positively contribute to the local area without undue impact on landscape character, visual amenity, and/or the *High Weald National Landscape*.
- 4.2.2. The design and consideration of landscape and visual resources is an iterative process, ensuring that all necessary measures to mitigate adverse effects are incorporated into the proposals from the outset. This approach places the environment at the forefront of the design process, aiming to preserve and enhance existing assets while sensitively integrating new development within its surroundings.
- 4.2.3. A thorough understanding of the Site and its context has informed the identification of opportunities and constraints, shaping the emerging development. A series of **Landscape Design Principles**, outlined below, support the overarching vision for the Site, creating a strong sense of place and ensuring that any future masterplan is guided by the Site's inherent qualities.
- 4.2.4. These principles should be read in conjunction with the plans prepared by the Project's masterplanners, *Edge Urban Design*, which have also considered highways, ecology, arboriculture and heritage as part of the consideration of the Site's opportunities and constraints. **Appendix 3: Emerging Proposals** appends copies of *Edge Urban Design's* proposals, presenting their **Constraints and Opportunities Plan** and **Illustrative Masterplan Options** for the Site and how it could be developed. It should be noted that two illustrative masterplans are appended, reflecting options that make provisions for potential future educational use.
- 4.2.5. The **Landscape Design Principles** seek to achieve the sensitive integration of new development with the existing landscape and local community. The final masterplan will prioritise the preservation and enhancement of on-site vegetation, supporting the incorporation of the new development into its context. The **High Weald Housing Design Guide** emphasises the importance of creating developments that are *"truly 'of the place', a genuine and integrated part of the existing settlement, rather than a generic 'added on' estate"*.
- 4.2.6. Any future proposals should respond sensitively to the Site's landscape context and the established character of Robertsbridge. Development should:
- **Conserve the Visual Environment:** New buildings should not exceed the height of nearby dwellings to avoid introducing visually prominent structures. The prominence of significant features, such as church towers and other heritage assets, should be maintained, noting that no such features have been identified near the Site within this report. Where key views are

identified through the ongoing design process, these should be protected and retained where practicable. Care will be required in areas of the Site with greater potential visibility from the wider landscape, notably the central southern extents where the elevated landform increases visibility.

Respond to Landform and Settlement Pattern: Development should respond to the local ridge and valley topography, reflecting the established settlement pattern of Robertsbridge which generally extends down the southern slopes rather than occupying the ridge crest or the northern slopes. New buildings should step with the landform to integrate with the existing settlement structure. The integrity of the existing landscape framework should also be maintained and enhanced, reinforcing and improving (where necessary) the relationship between development and the surrounding topography. There are also opportunities to enhance the existing settlement edge, where it is currently defined by 'hard' urban boundaries, including close-boarded fencing and chain-link enclosures. These elements could be replaced or softened through the introduction of appropriate landscape proposals, thereby improving the transition between the urban area and the adjoining rural countryside.

- **Consideration of Density and Layout:** Development densities should be carefully managed, particularly at the interface with the surrounding countryside. Frontages and rear boundaries should avoid rigid alignments onto open space, ensuring a more organic and contextually appropriate layout.
- **Respond to Local Character and Vernacular:** Development should reflect the distinctive character of the area, taking account of the prevailing scale, layout, and materials of the local vernacular.
- **Reinforce the Community Focus:** The layout should create a positive interface with Robertsbridge Community Centre, allowing development to front onto this facility and strengthen its role as a focal point within immediate area.
- **Safeguarding and Strengthen Landscape Structure:** Appropriate offsets from Site boundaries and key landscape features should be maintained to protect the mature on-site vegetation and other valued elements. Planting of native species is encouraged to support wildlife and reinforce the rural character of the Site. Existing boundary vegetation and field patterns should be retained wherever possible and enhanced through additional planting. This approach would reinforce the Site's landscape framework and maintain continuity with the surrounding rural character.
- **Integrated Green Infrastructure:** Proposals should create multifunctional green spaces that connect development parcels, utilising existing natural features to support biodiversity, recreational use, and visual containment.

Green infrastructure can accommodate natural play areas and trails, linking to the wider Public Rights of Way network and landscape.

- **Preserve Dark Skies:** The design should protect the dark skies of the wider landscape, a recognised feature of National Landscapes. Any necessary lighting should be carefully designed to minimise light pollution and avoid skyglow.

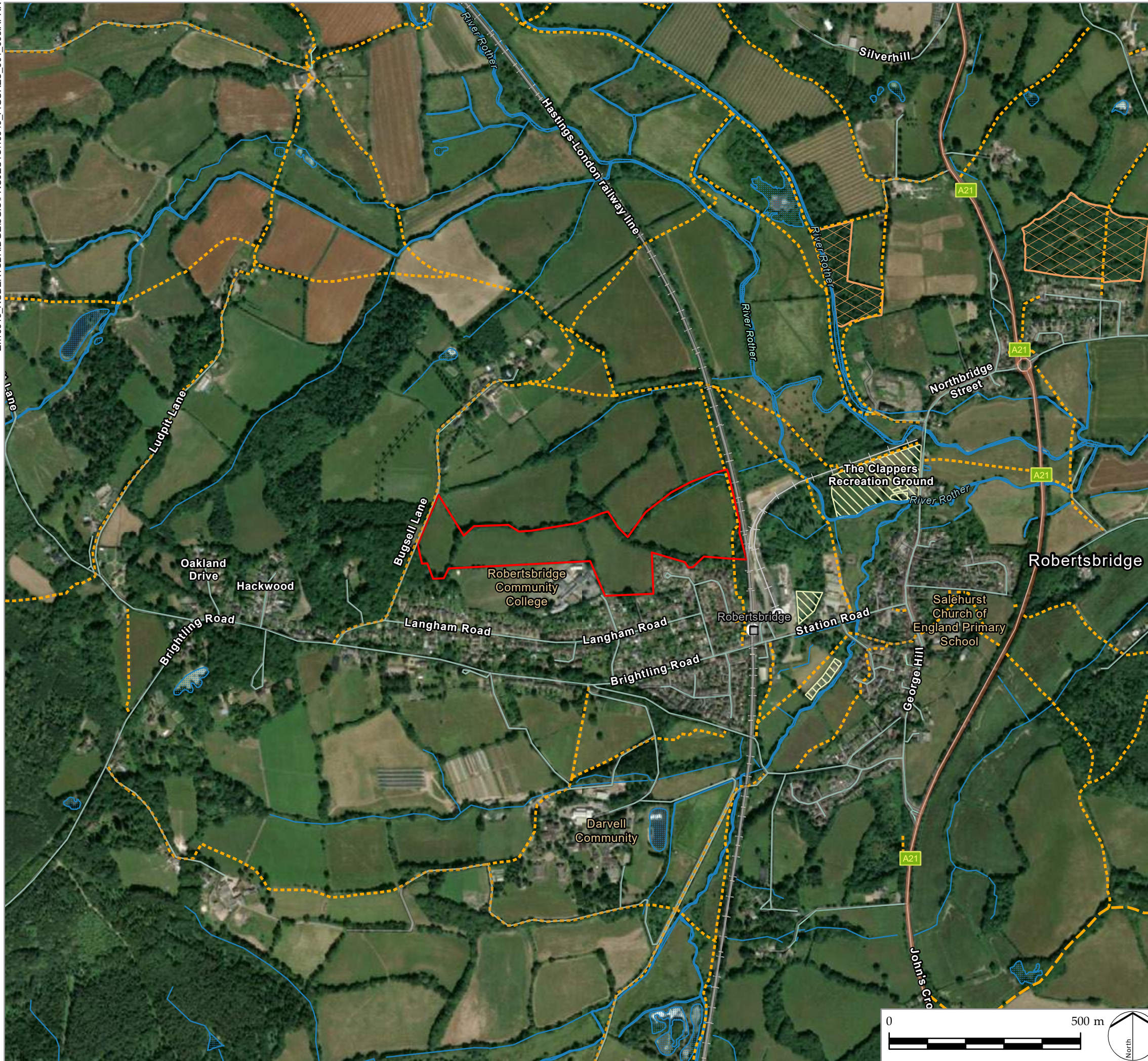
5. Conclusion

- 5.1.1. It is acknowledged that there would be inevitable changes to the Site's landscape character and that views would be available to new buildings within the Site's local context.
- 5.1.2. However, LDA Design considers that the Site and its proposals have the capacity to accommodate a sensitively designed scheme, which is sympathetic to the prevailing characteristics of the surrounding landscape; provided the outlined design recommendations for a landscape-led scheme are followed and appropriate mitigation and enhancement measures are incorporated into its final design to address potential landscape and visual effects.
- 5.1.3. The emerging proposals drawn by *Edge Urban Design* presently adhere to a landscape-led approach and the considerations of this LVA.

Appendix 1 Figures

5.1.4. This appendix provides full-size versions of the following figures reproduced and referenced in the main report:

- Figure 1: The Site and its Local Context
- Figure 2: Landform
- Figure 3: Preliminary Zone of Theoretical Visibility Study



LEGEND

- Site Boundary
- Local Open Spaces
- Water body
- Water course
- Local Road
- Woodland Trust sites
© The Woodland Trust
- Public Rights of Way (PROW)
- Footpath
- Bridleway
- Railway Station
- Railway line

LDĀ DESIGN

PROJECT TITLE
LAND AT KNELLE ROAD, ROBERTSBRIDGE

DRAWING TITLE
Figure 1: The Site and Its Local Context

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STATUS	Final	APPROVED	PL

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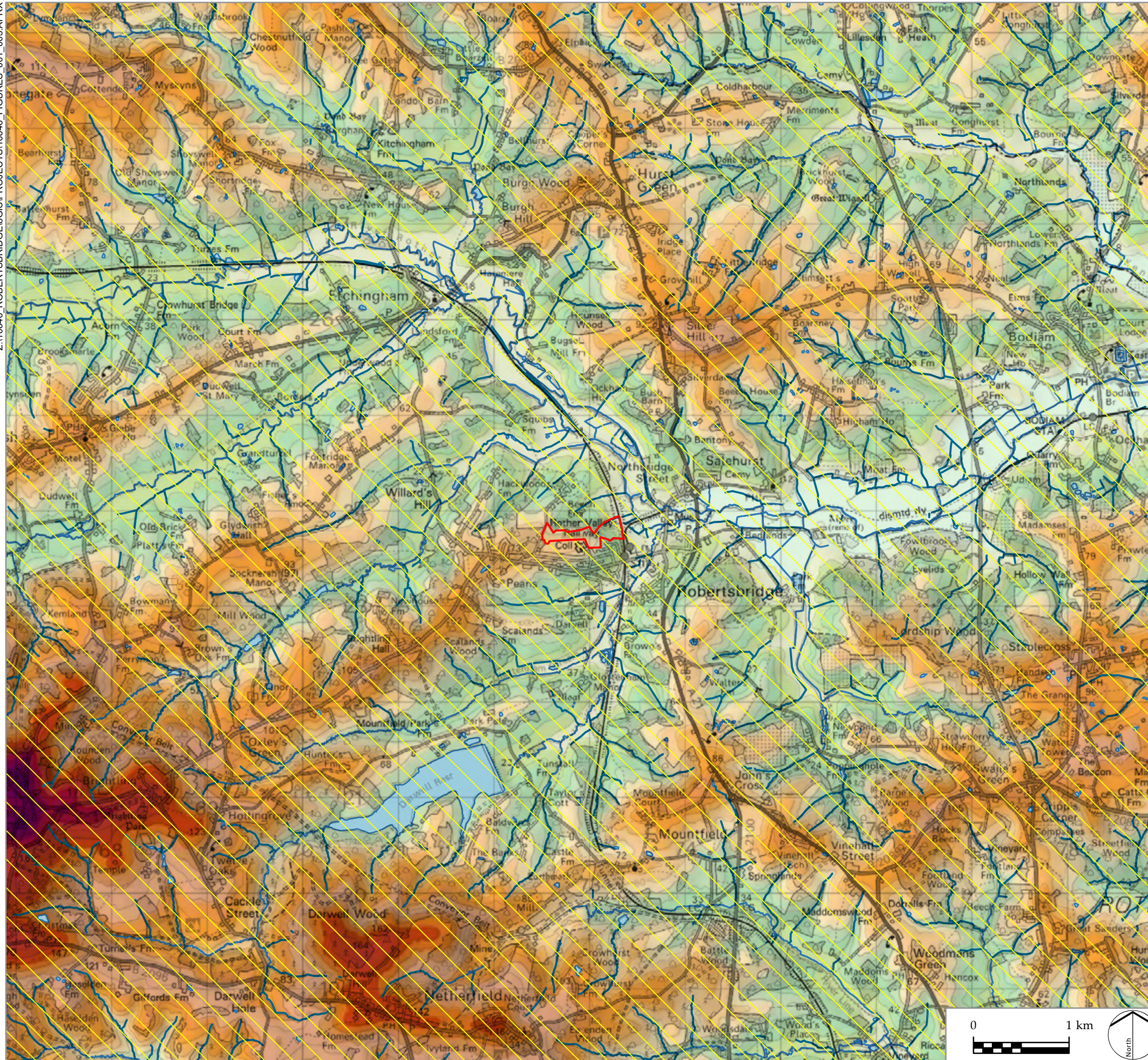
No dimensions are to be scaled from this drawing.
 All dimensions are to be checked on site.
 Area measurements for indicative purposes only.

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Sources: Ordnance Survey, Natural England, Sustrans, The Woodland Trust.






















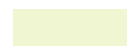
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LEGEND

-  Site Boundary
-  National Landscape
-  Waterbodies
-  Watercourses

Elevation (m AOD)

	190 - 200		90 - 100
	180 - 190		80 - 90
	170 - 180		70 - 80
	160 - 170		60 - 70
	150 - 160		50 - 60
	140 - 150		40 - 50
	130 - 140		30 - 40
	120 - 130		20 - 30
	110 - 120		10 - 20
	100 - 110		0 - 10

LDĀ DESIGN

PROJECT TITLE
LAND AT KNELLE ROAD, ROBERTSBRIDGE

DRAWING TITLE
Figure 2: Landform, Land Cover, and Settlement Pattern

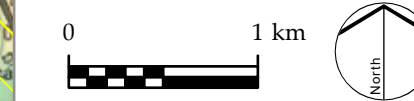
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LEGEND

- Site Boundary
- Public Rights of Way (PROW)
- Footpath
- Bridleway
- Proposed Residential Developable Area
- Zone of Theoretical Visibility (ZTV) (computer generated) - based on Proposed Residential Developable Area height of 12m
- Viewpoint Locations

This drawing is based upon computer generated Zone of Theoretical Visibility (ZTV) studies produced using the viewshed routine in the ESRI ArcGIS Suite. The areas shown are the maximum theoretical visibility, taking into account topography, vegetation and buildings which have been included in the model with the heights obtained from a LiDAR digital surface model.

Due to its resolution, the surface model does not take into account every localised feature such as walls, small hedgerows or small trees and therefore only gives an impression of the extent of visibility.

The ZTV includes an adjustment that allows for Earth's curvature and light refraction. It is based on LiDAR terrain data with a 2m² resolution.

LDĀ DESIGN

PROJECT TITLE

LAND AT KNELLE ROAD, ROBERTSBRIDGE

DRAWING TITLE

Preliminary Zone of Theoretical Visibility Study

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SCALE @A3	1:25,000	CHECKED	NA
STATUS	Final	APPROVED	PL

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Appendix 2 Relevant Local Planning Policies and Extracts from Local Guidance Documents

5.1.5. Local policies pertinent to the purpose of this LVA are outlined below.

5.2. Rother Local Plan Core Strategy (2014)

5.2.1. **Policy OSS2 Use of Development Boundaries** outlines how “Development Boundaries around settlements will continue to differentiate between areas where most forms of new development would be acceptable and where they would not.” However, this policy makes clear that existing boundaries will be reviewed in the Development and Site Allocations DPD (‘DaSA’), considering different factors, such as [inter alia]:

- Existing pattern, form and function of settlements, including of closely ‘linked’ settlements and important ‘gaps’ of countryside between them
- Character and settings of individual towns and villages
- Sensitivity to further development both within the main built up confines and in more rural fringes
- The amount of land needed to fulfil development needs and requirements
- Environmental considerations, including the need to conserve designated areas of national and local landscape, archaeological, geological, ecological or historical importance
- Following physical features, unless this may suggest a potential for development that is inappropriate

5.2.2. **Policy OSS3 Location of Development** outlines the criteria for assessing the suitability of a particular location for development, when both allocating land for development and determining planning applications, sites and/or proposals, making clear that it should accord with the relevant policies of the Core Strategy. The criteria are to be considered in the context of the following [inter alia]:

- The spatial strategy for the particular settlement or area, and its distinct character
- Making effective use of land within the main built-up confines of towns and villages, especially previously developed land, consistent with maintaining their character
- The deliverability of development, including consideration of land ownership patterns and the viability of development

5.2.3. **Policy OSS4 General Development Considerations** outlines the additional criteria for new development, in support of Policies OSS2 and OSS3, which is as follows [inter alia]:

- It does not unreasonably harm the amenities of adjoining properties

- It respects and does not detract from the character and appearance of the locality
- It is compatible with both the existing and planned use of adjacent land, and takes full account of previous use of the site
- In respect of residential development, is of a density appropriate to its context, having due regard to the key design principles

5.2.4. **Policy EN1 Landscape Stewardship** states how the management of the high quality historic, built and natural landscape character of the district is to be achieved by ensuring the protection, and wherever possible enhancement, of the district's nationally designated and locally distinctive landscapes and landscape features. This policy identifies the distinctive identified landscape character, ecological features, and settlement pattern of the High Weald National Landscape, in which the Site is located. Furthermore, the policy identifies key assets of the district, including:

- Open landscape between clearly defined settlements, including the visual character of settlements, settlement edges and their rural fringes; [...]
- Ancient woodlands;
- Tranquil and remote areas, including the dark night sky;
- Other key landscape features across the district, including native hedgerows, copses, field patterns, ancient routeways, ditches and barrows, and ponds and water courses.

5.2.5. **Policy EN3 Design Quality** sets out the requirements for new development to satisfy and be considered of a high design quality. Those requirements relevant to landscape and visual resources are considered by this LVA, and set out below for reference [inter alia]:

- Contributing positively to the character of the site and surroundings, including taking opportunities to improve areas of poor visual character or with poor townscape qualities, and
- Demonstrating robust design solutions tested against the following Key Design Principles as appropriate (expanded in Appendix 4), tailored to a thorough and empathetic understanding of the particular site and context.

5.2.6. **Policy EN5 Biodiversity and Green Space** outlines how the new development is firstly required to protect and enhance the biodiversity, geodiversity and green spaces of its site, taking due consideration of the district-wide network of green infrastructure and the international, national and locally designated sites within the district. It also sets out how the development should seek to ensure that development retains, protects and enhances habitats of ecological interest; and that developers are to integrate biodiversity into development schemes by avoiding adverse impacts from development on biodiversity or habitat, or where

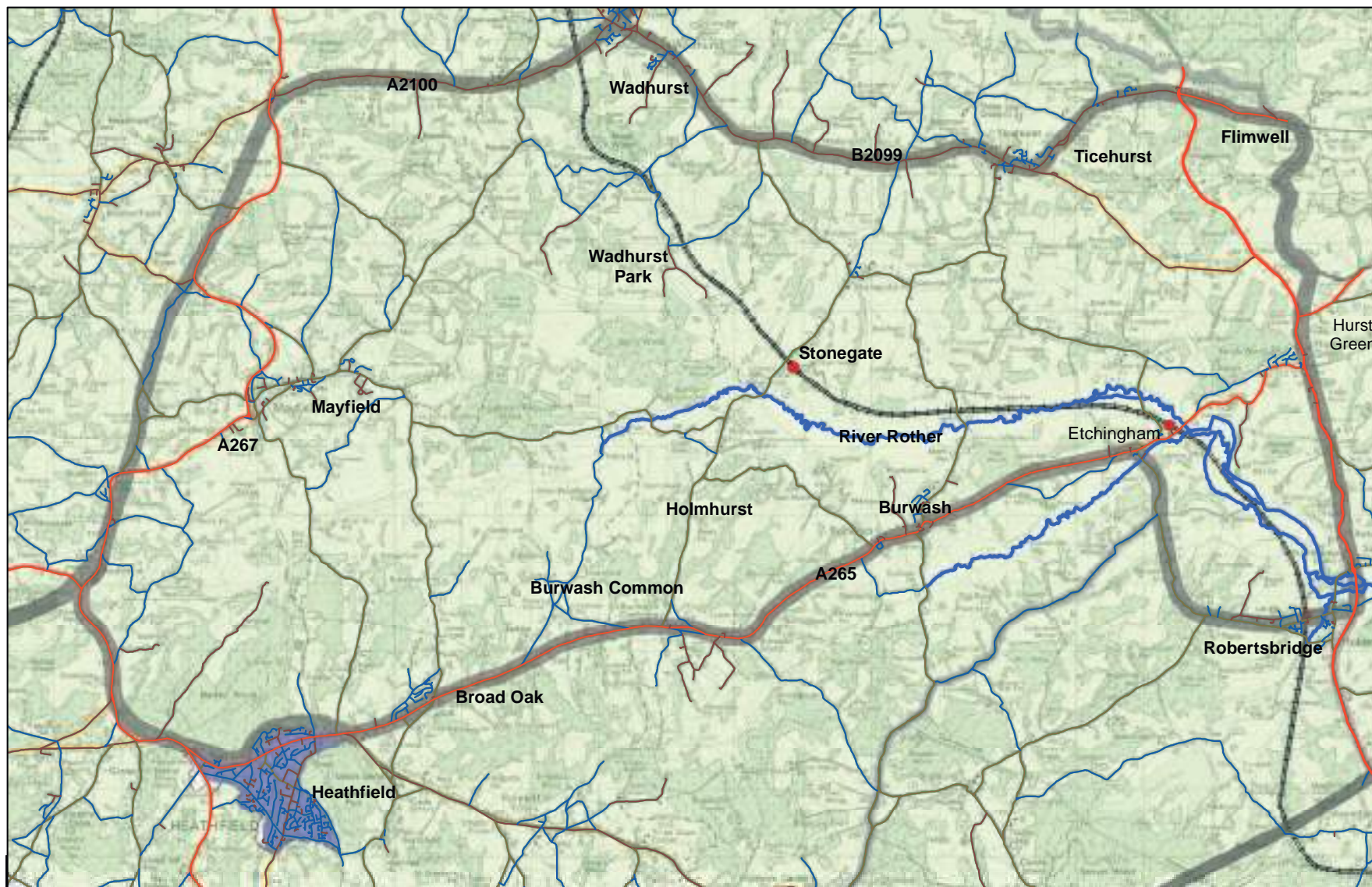
wholly unavoidable, provide appropriate mitigation against or compensation for any losses.

5.3. Development and Site Allocations Development Plan Document (2019)

5.3.1. **Policy DEN1 Maintaining Landscape Character** outlines how the siting, layout and design of development should maintain and reinforce the natural and built landscape character of the area in which it is to be located, based on a clear understanding of the distinctive local landscape characteristics, in accordance with Core Strategy Policy EN1. The policy emphasises the need to maintain the sense of tranquillity of more remote areas, including through maintaining 'dark skies' in accordance with Policy DEN7 Environmental Pollution.

Policy DEN2 The High Weald Area of Outstanding Natural Beauty (AONB) sets out how all development within or affecting the setting of the High Weald National Landscape (formerly called AONB) shall 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. Development within the High Weald National Landscape should be small-scale, in keeping with the landscape and settlement pattern; major development will be inappropriate except in exceptional circumstances.

Upper Rother Valley

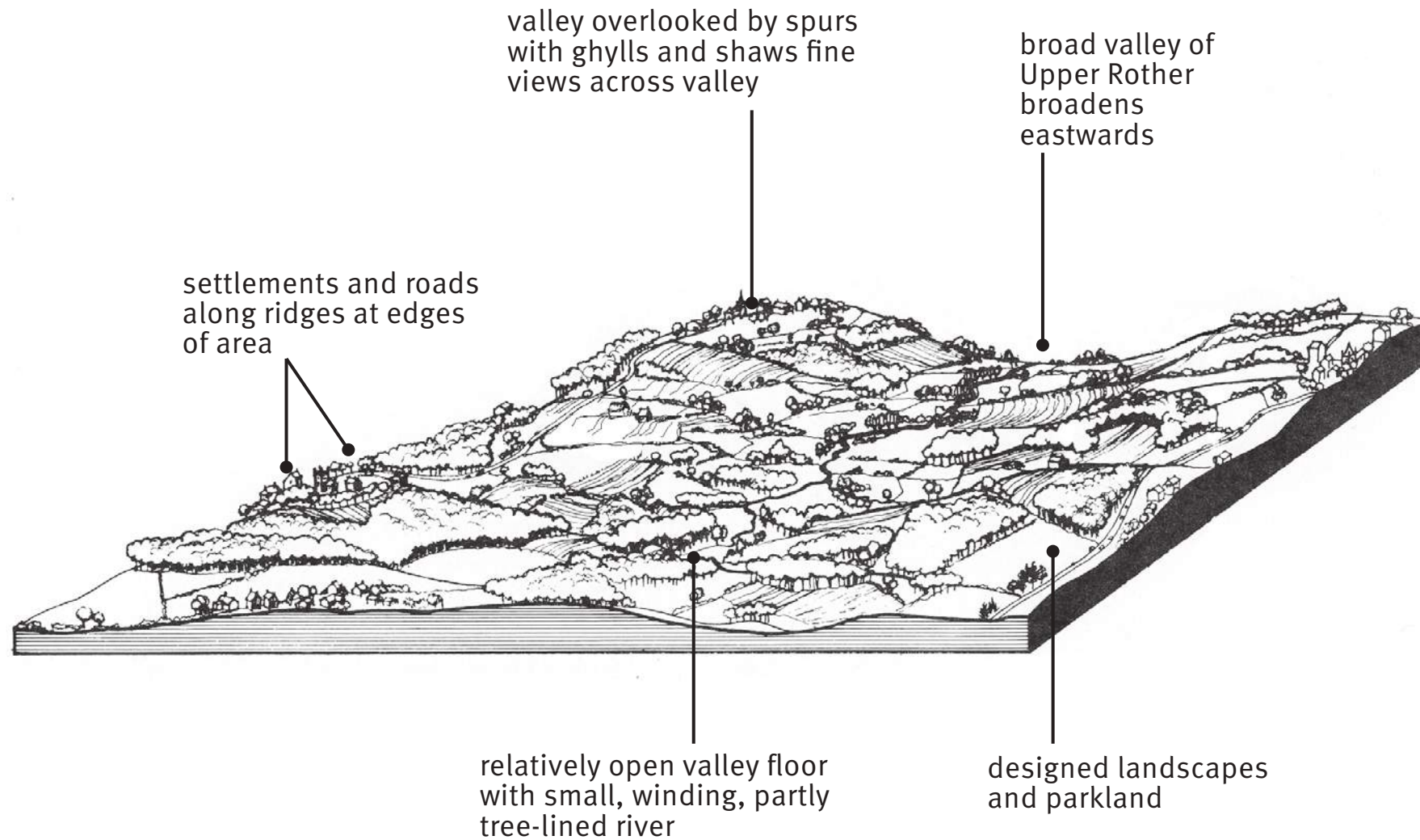


6 Upper Rother Valley Landscape Character Area

High Weald AONB

0 0.5 1 2 3 4 Kilometers

Upper Rother Valley



Upper Rother Valley

Contents

- A. Landscape Description
- B. Landscape Evaluation
- C. Vision and Strategy
- D. Guidelines for Managing Change

A Landscape Description

Key Landscape characteristics

- The larger settlements on high ground of Mayfield in the west, Wadhurst and Ticehurst in the north, Hurst Green in the east and Burwash to the south.
- Mayfield, Robertsbridge and Wadhurst are nucleated villages which have grown around a historic core.
- Other settlements have grown as ribbon developments strung along the main roads which follow the ridges on the boundaries of the area.
- The village of Robertsbridge on lower ground adjacent to the river was vulnerable to flooding until recent major flood protection measures were constructed.
- The broad valley of the River Rother dominates the landscape and is overlooked by bold ridges and spurs.
- 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.
- Rolling, richly wooded landscape centred on the flat main valley which broadens in the east.

- Relatively open valley floor with small, winding, partly tree-lined river.
- Large intensively grazed or cropped fields on the lower valley slopes and patterns of smaller medieval fields on the steeper slopes.
- The Rother regularly floods turning the whole valley bottom into a huge sheet of water.
- A strong pattern of linear ghyll woods as well as many larger woods on the valley slopes.
- 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.
- ‘Picturesque’ farms and cottages and scattered historic farmsteads which are a key characteristic of the High Weald.
- Many of the woods are ancient semi-natural woodland with extensive areas replanted with chestnut coppice mixed with conifers.
- Characteristic tree species are of chestnut, larches and pines on the sandy soils of the Ashdown beds.
- Oak, hornbeam and ash predominate in the larger woodlands with hazel understorey.
- Ancient coppice stools of chestnut and hornbeam which have not been managed for many years.
- Other characteristic species are field maple, wild cherry and alder and willow in the river and stream valleys.
- Many scattered farm ponds and larger hammer ponds as relics of the iron industry which thrived in this area e.g. Wadhurst Park Lake and Lakedown trout lake at Holmhurst Manor.

Upper Rother Valley

- A close network of winding, sunken lanes with scattered settlements and individual dwellings often strung out along them.
- Traditional building materials for the area are red brick, often laid as Flemish bond with blued brick ends, red tiled roofs and tile hung upper stories are typical.
- Oak timber framed and sandstone houses reflect the abundance of locally sourced timber and quarried stone.
- There are no main roads crossing the area but the A265 forms the southern boundary and the A267 and A21 cross the west and east edges respectively.
- The Hastings to Tunbridge Wells railway follows the valley from Robertsbridge to Wadhurst.

Cultural Interests

The area was the centre of the Wealden iron industry which thrived due to the abundance of available timber and water and good transport routes to the sea.

This is reflected in local place names and the many forges and mills. Many of the fine houses and large estates in the area also grew from the wealth generated by the industry. The fine houses which line the streets of the larger villages date from the time of the iron industry boom.

In the 18th century the area was known for smuggling of wool, silk and brandy particularly around the village of Mayfield. This was facilitated by good road access to the coastal ports of Hastings and Rye. The remote and wooded character of the area provided hiding places for smugglers and their contraband.

The main toll road from Heathfield to Burwash, now the A265 was a notorious haunt for highwaymen.

Before the Beeching cuts Mayfield was served by the railway from Eastbourne to London, the track was used as the line for the village by pass which was constructed in the early 1990s.

There are many historic buildings scattered across the area and some of the more notable ones are Abbots House (1250) which is the only remaining part of Robertsbridge Abbey. Haremere Hall at Etchingham dates to the early 1600s.

The area has attracted many famous and wealthy residents probably due to the relative remoteness and beauty of the area and ease of access to London. Wadhurst Park is home to the Tetra Pac businessman Hans Rausing and his large collections of rare deer. Holmhurst Manor has been home to Roger Daltry of the Who since the 1970s. Robert Smith, lead singer of the Cure, lives in Burwash and Jeff Beck the guitarist lives in Wadhurst.

Other notable residents were the cricketer Albert Relf (1874-1937) who was born in Burwash. Andrew Young the writer and poet was vicar of Stonegate from 1941-1959.

Robertsbridge is known for the production of cricket bats founded by Gray-Nicholls in 1876 and using locally sourced willow wood.

HMS Etchingham was named after the village as all of the 93 minesweepers built between 1954 and '59 of the *ham* class which were designed for the shallow waters around our coasts were named after places ending in *ham*.

Upper Rother Valley

Table 1 Key positive Landscape Attributes

- The broad valley of the River Rother dominates the landscape and is overlooked by bold ridges and spurs.
 - 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.
 - 'Picturesque' farms and cottages and scattered historic farmsteads which are a key characteristic of the High Weald.
 - A strong pattern of linear ghyll woods as well as many larger woods on the valley slopes.
 - Many of the woods are ancient semi-natural woodland with ancient coppice stools of chestnut and hornbeam.
 - Many scattered farm ponds and larger hammer ponds as relics of the iron industry which thrived in this area e.g. Wadhurst Park Lake and Lakedown trout lake at Holmhurst Manor.
- A close network of winding, sunken lanes with scattered settlements and individual dwellings often strung out along them.
 - Traditional building materials for the area are red brick, often laid as Flemish bond with blued brick ends, red tiled roofs and tile hung upper stories are typical.
 - Oak timber framed and sandstone houses reflect the abundance of locally sourced timber and quarried stone.

Upper Rother Valley

B Landscape Evaluation

Table 2 Current Condition

This is a largely unspoilt and tranquil rural landscape with few intrusive features. The landscape is in generally good condition and well managed as farmland with a strong historic structure. The lack of main roads and large settlements in the heart of the area means that it retains a relative remoteness. Agricultural change and diversification has led to some fragmentation of farm steads. There is evidence of creeping suburbanisation around the villages and on country estates which detracts from local distinctiveness. 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. Woodlands have been affected by lack of traditional coppice management, rhododendron invasion and coniferisation.

Forces for Change impacting on positive attributes

Past / Current forces for change

- Ribbon development and modern housing developments on the Heathfield to Burwash ridge.
- Creeping suburbanisation and cumulative changes in the rural landscape, roads and villages which are not in sympathy with local distinctiveness or vernacular architecture.
- Development pressures in the larger villages.
- Erosion of public rights of way where users avoid the muddy areas making tracks increasingly wider.
- Agricultural diversification to hobby farms and horsiculture.
- Changes in the types and frequency of grazing animals in the countryside impacts on character as they are a characteristic feature. Lack of grazing can give an unmanaged appearance to the landscape and reduce the biodiversity value.
- Loss of unimproved species rich pastures and hay meadows.
- The positive land management initiatives associated with the High Weald AONB.
- Areas of large scale intensive arable farming with loss of hedge structure, especially on the wider valley floors.

Upper Rother Valley

- Farm Environment Plans, many farms are under Entry Level Stewardship including extensive areas in the Rother Valley to the east of Mayfield and south of Wadhurst including Wadhurst Park and Holmhurst Farm. Some farms are farmed organically, notably Clayton Farm south of Mayfield.
 - Intrusive modern farm buildings.
 - Loss of riverside trees due to agriculture and flood management engineering works.
 - Coniferisation of larger woods.
 - Loss of traditional coppicing in woodlands and increase in game shooting.
 - Woodland Grant schemes are scattered across the area, notably Hawksden Park and Newbridge woods, reversing the trend of poor woodland management.
 - Increasing traffic on the main roads which cross the north and south of the area and rat running on rural lanes.
- Future Forces for Change**
- The need to provide local housing in the villages, especially the larger service centres.
 - The associated infrastructure required for new development such as waste water treatment works.
- Traffic and rat running on narrow rural roads. Erosion of the edges of sunken lanes by increasingly larger agricultural and other vehicles.
 - Demands for traffic calming and road improvements which could introduce increasing urban clutter to rural roads, villages and lanes.
 - Continued agricultural change due to changing markets, economic pressures and response to climate change.
 - The spread of small agricultural holdings, hobby farming, paddocks, farm shops and allotments for local food production.
 - Pressure for locating renewable energy facilities for solar, wind and bio energy.
 - Pests and diseases of trees which could impact significantly on the mature tree stock. E.g. phytophthora of alder and Ash dieback.
 - Failure to control invasive species of plants and animals in water courses, such as New Zealand Pigmy Weed (*Crassula helmsii*), Parrots Feather (*Myriophyllum aquaticum*), Mink and European Marsh Frog (*Pelophylax ridibundus*). All of these impact on the native flora and fauna which are characteristic of the area.
 - Water quality in the River Rother catchment.

Upper Rother Valley

Table 3 Potential Impacts of Climate Change

- Potential changes in woodland / tree species composition and accelerated growth of species such as birch and rhododendron.
- Changes in ground flora which produce distinctive seasonal displays.
- Increased prevalence of pests and diseases due to warmer weather e.g. Phytophthora of Alder.
- Changes in precipitation and temperatures will change the types of crops that farmers grow.
- More frequent and serious flood events in the valley bottoms.
- Potential impact on the viability of grazing sheep, dairy and beef.
- Increased temperatures and a decline in precipitation levels may dry out wetland habitats and ponds and alter stream flows.
- Changes in water levels in ditches, ponds and streams

Upper Rother Valley

C Vision and Strategy

Table 4 Vision

A remote, tranquil and predominately rural landscape of rolling typical high wealden countryside. Secluded valleys with ghyll woodlands and winding natural river channels. A landscape with a scattered settlement pattern of historic farmsteads and a strong pattern of woods, trees and hedges. The character of existing settlements retained and new development controlled with the highest quality vernacular design and spatial planning.

As noted in the current Landscape Character Guidance – A Landscape Strategy identifies *“what change if any is desirable for any landscape character area as a whole?”*

Landscape change and adaptation to meet the strategy requires:

1. Planning for the enhancement of the Rother, Brede and Tillingham Woods Biodiversity Opportunity Area (BOA). This aims to restore wetlands in the River Rother floodzone. The focus in the upper tributary valleys is woodland management through the Rother Woods Project.
2. Protection and management of existing wetland habitats and planning for restoration of ditches, riverside vegetation and tree cover to restore habitat linkages and continuity.
3. Protection and enhancement of the remote qualities of the river valleys.
4. Planning for the creation of multifunctional green infrastructure to maximise the opportunities for biodiversity and recreation offered by the rural lanes, rights of way network and extensive woodland.
5. Consider the potential to plan for recreational access in this character area identifying areas where public access can be encouraged whilst protecting other areas where wildlife conservation is the priority.
6. Integrate proposed and existing development into the landscape through planting of tree features and woodland to define the town and village boundaries with the countryside.
7. Ensure that the design and layout of new developments respect the character and form of the landscape and existing settlements.
8. Control the spread of suburbanisation by minimising clutter of signage and other urban features in lanes and villages.
9. Conserve the setting of historic buildings and landscape features.
10. Protect and enhance historic designed landscapes and features of archaeological significance.
11. Consider appropriate species for new plantings to maintain landscape character and biodiversity having regard to adaptation to climate change influences.
12. Restore and strengthen tree and woodland structure, encouraging woodland grant and farm conservation schemes and positive woodland management.
13. Encourage screening of farm groups as a component of these schemes.

Upper Rother Valley

D Guidelines for Managing Change

Development considerations for housing and other development

Proposals within the High Weald AONB need to have regard for the current High Weald Management Plan:

<http://www.highweald.org/downloads/publications/high-weald-aonb-management-plan-documents/1141-high-weald-management-plan-3rd-edition-2014-2019.html>.

The main pressures for development in this character area will be to accommodate housing for the populations in the rural settlements of Mayfield, Wadhurst and Burwash. There will inevitably be a demand for local housing in the smaller villages.

Tourism is an important source of income to this area and there is likely to be increasing demand for accommodation in hotels, bed and breakfast, caravan and camp sites. The modern trend for luxury and exotic camping (glamping) is already appearing in the guise of teepees, tree houses and the like. There will be demand for new facilities and to improve or expand existing, some of these putting pressure on ancient woodland. Any new development should respect the key positive attributes in the landscape outlined in Table 1 above.

Proposed development should consider opportunities for proactively meeting the Landscape Change Strategy aims for this Landscape Character Area as set out in 1-13 above.

Upper Rother Valley

Table 5

Current issues offering opportunities for protection and enhancement	Landscape Management Guidelines	Benefits delivered by Ecosystem Services for each area of interest
<p>Countryside and Farmland Farm environment plans relating to much of the farm land including organic farming.</p> <p>Pressure for farm diversification and development of hobby farms, solar arrays, wind farms, waste recycling operations etc.</p> <p>Expansion of camping and caravan sites as well as other holiday related development such as ‘Glamping’.</p> <p>Land falling out of positive management and dereliction of farm buildings.</p> <p>Loss of hedgerows and other traditional field boundaries.</p> <p>Loss of traditional orchards, pasture and species rich meadows.</p> <p>Localised flooding of farmland in the river valleys and floodplains.</p> <p>Low water levels and poor water quality in some rivers and streams.</p> <p>Deterioration of by ways and lanes due to erosion of un-surfaced routes by horses, bikes and 4 wheel drives.</p> <p>Damage to verges on narrow country lanes caused by increasing size of farm vehicles and passing traffic.</p> <p>Overstocking and arable production on some soils can result in soil erosion and reduce soil quality.</p>	<p>Countryside and Farmland Encourage establishment of more farm conservation schemes to conserve the landscape structure of hedges, shaws, ponds and streams.</p> <p>Conserve hedges, trees and ghyll woods. Maintain the mixed farmed character of the area.</p> <p>Protect and manage historic field patterns and conserve boundary features.</p> <p>Use tree and woodland planting to screen intrusive farm buildings and caravan sites.</p> <p>Plan for and manage changes which may occur in the landscape due to changes in farm management brought about by economic influences and climate change.</p> <p>Address existing flooding issues of farmland and properties through flood management and by identifying areas which can provide flood alleviation.</p> <p>Enhance the biodiversity value of wet meadows, drainage and stream channels.</p> <p>Conserve and enhance byways and rural lanes.</p> <p>Reduce the risk and incidence of soil erosion by encouraging the restoration of arable land to pasture.</p> <p>Apply best land management practices to prevent soil and fertiliser run off, thereby protecting surface and ground water.</p>	<p>Provisioning services Water availability Food production</p> <p>Regulating services (water purification, air quality maintenance and climate regulation) Water quality and protected aquifers. Regulating water flow and preventing flooding Soil conservation and erosion control Habitat and species resilience to climate change Carbon sequestration. Areas of peat in the river valleys, hedges, trees, reed beds and grassland regulate air quality by absorbing and retaining CO₂.</p> <p>Cultural Services Sense of Place and local distinctiveness. Source of Inspiration Sense of History Tranquillity Biodiversity</p>

Upper Rother Valley

Current issues offering opportunities for protection and enhancement	Landscape Management Guidelines	Benefits delivered by Ecosystem Services for each area of interest
<p>Trees and Woodland Ancient woodland and tree belts are not in positive management.</p> <p>Ghyll woodlands are not in positive management and are difficult to manage due to the steep and inaccessible nature of these woods.</p> <p>Traditional management has stopped as it is not commercially viable e.g. pollarding of stream side willows.</p> <p>Tree diseases.</p> <p>Ancient parkland trees dying off and not being replaced.</p> <p>Extensive areas of woodland are already in woodland grant schemes.</p> <p>Pressure for glamping sites in woodland.</p> <p>Invasive species competing with native flora and fauna e.g. Spanish Bluebell, Himalayan balsam, Japanese knotweed, rhododendron.</p>	<p>Trees and Woodland Actively manage trees and woodland through coppicing, pollarding of willows and replanting to create a diverse age structure.</p> <p>Plant new small woods, wet woodland and tree belts to strengthen the landscape character and where this is appropriate habitat creation.</p> <p>Consider the need to adapt to changes enforced by climate change, such as specific tree diseases and possible adaptation in species selection.</p> <p>Replant parkland and individual hedgerow trees.</p> <p>Plant trees and woodland to contain existing and new built development.</p> <p>Encourage planting of trees along streams and ditches where appropriate for the habitat.</p>	<p>Provisioning Fuel (woodfuel for local communities from woodland management)</p> <p>Regulating Carbon sequestration, woodland absorbs and holds CO₂. Habitat and species resilience to climate change</p> <p>Cultural Tranquillity Sense of Place and local distinctiveness Cultural heritage (traditional woodland management) Biodiversity</p>

Upper Rother Valley

Current issues offering opportunities for protection and enhancement	Landscape Management Guidelines	Benefits delivered by Ecosystem Services for each area of interest
<p>Other Key Habitats Deterioration and loss of habitats :</p> <p>Water Loss of river and streamside vegetation. Deterioration of water quality in streams, ditches and ponds Invasive species of plants and animals which compete with native flora and fauna.</p> <p>Wet Meadows Financial and viable farming constraints affecting the continued management of wet meadows reducing the biodiversity value. Agricultural improvement to Grassland and meadows reducing species richness. Loss of wetland meadows to arable farming.</p>	<p>Other Key Habitats Encourage management of river and stream channels, especially conservation of riverside trees and vegetation. Conservation and re-creation of wet meadow/ pasture habitats. Agri-environment schemes to maximise biodiversity and encourage the retention of grazing. Opportunities to maximise reed bed creation. Encourage measures to improve water quality. Continue schemes to encourage farmers to minimise the use of chemicals and fertilizers.</p>	<p>Provisioning Nature’s larder of free berries and herbs. Conservation of insect pollinators for pollination of crops.</p> <p>Regulating Habitat and species resilience to climate change</p> <p>Cultural Appreciation of nature Educational value Biodiversity</p>

Upper Rother Valley

Current issues offering opportunities for protection and enhancement	Landscape Management Guidelines	Benefits delivered by Ecosystem Services for each area of interest
<p>Recreation, Green Infrastructure (GI) and ANGS Pressure on bridleways and byways as multi use, including cycling and 4 wheel drives increasing erosion.</p> <p>Lack of funding to manage and enhance GI for improved access.</p> <p>Need for better recreational linkages and improved sustainable transport corridors.</p> <p>Extensive footpath and bridleway network</p> <p>Need for improved access to natural green space for all users both close to homes and in the wider countryside.</p> <p>Gentrification</p> <p>Loss of tranquillity due to more cars and access.</p>	<p>Recreation, Green Infrastructure and ANGS Where appropriate develop Green Infrastructure Strategies based on a county wide GI mapping.</p> <p>Plan for and manage recreational pressure on the countryside which could be affected by the increase in population as well as the seasonal holiday makers.</p> <p>Maximise opportunities for access away from sensitive habitats.</p> <p>Consider opportunities to create new green corridors and improve existing as safe ideally motorised traffic free recreational routes.</p> <p>Maximise opportunities for and manage water based recreational activities.</p> <p>Consider sensitive traffic management on rural lanes.</p>	<p>Provisioning Protected farmland.</p> <p>Regulating Habitat and species resilience to climate change Water quality and protected aquifers. Regulating water flow and preventing flooding Carbon sequestration</p> <p>Cultural Recreation Heritage assets and cultural heritage Inspirational Tranquility Biodiversity</p>

Upper Rother Valley

Current issues offering opportunities for protection and enhancement	Landscape Management Guidelines	Benefits delivered by Ecosystem Services for each area of interest
<p>Horse Keeping ('horsiculture') and small holdings</p> <p>Deterioration of the character and quality of the landscape and loss of local distinctiveness.</p> <p>Loss of historic field pattern where fences replace hedges.</p> <p>Intensive grazing can cause soil erosion.</p>	<p>Horse Keeping ('horsiculture') and small holdings</p> <p>Enhance the condition of areas of horsiculture and small holdings through the restoration of an intact, well managed hedgerow or ditch network and retaining a diverse grass sward by preventing overgrazing.</p> <p>Encourage local food production and allotment provision in areas where this will not detract from local landscape character.</p>	<p>Provisioning</p> <p>Grazing</p> <p>Food production</p> <p>Regulating</p> <p>Habitat and species resilience to climate change</p> <p>Cultural</p> <p>Recreation</p> <p>Heritage assets</p> <p>Sense of Place and local distinctiveness</p> <p>Biodiversity</p>

Upper Rother Valley

Current issues offering opportunities for protection and enhancement	Landscape Management Guidelines	Benefits delivered by Ecosystem Services for each area of interest
<p>The character of the villages</p> <p>Gentrification</p> <p>Urbanisation</p> <p>Development pressures</p> <p>Gradual loss and deterioration of heritage features.</p> <p>Fast traffic on rural lanes</p> <p>Visitor pressure and cars detracting from local character and distinctiveness of the area in general.</p>	<p>Protect and Enhance the character of the villages</p> <p>Encourage the production of Neighbourhood Plans which incorporate village design guides.</p> <p>Plan for new development in the villages to ensure it is designed to a high standard to reflect local character and sense of place.</p> <p>Establish defined development edges to villages with new tree planting.</p> <p>Prepare village design guides and tree conservation plans.</p> <p>Consider traffic management on rural lanes.</p>	<p>Provisioning</p> <p>Local amenities and facilities.</p> <p>Regulating</p> <p>Use of sustainable materials</p> <p>Habitat and species resilience to climate change</p> <p>Water quality and protected aquifers.</p> <p>Regulating water flow and preventing flooding</p> <p>Cultural</p> <p>Sense of Place and local distinctiveness</p> <p>Heritage assets</p> <p>Biodiversity</p>

Upper Rother Valley

Current issues offering opportunities for protection and enhancement	Landscape Management Guidelines	Benefits delivered by Ecosystem Services for each area of interest
<p>Flood management and SUDS schemes?</p> <p>Flash floods and run off.</p> <p>Flooding of properties in low lying areas by river and ground water.</p>	<p>Flood management and SUDS schemes?</p> <p>Plan for flood management by conserving and enhancing the flood plains and managing water levels in ditches and drains.</p> <p>Encourage the design of sensitive flood defence schemes which conserve and enhance the landscape and habitats including river channel restoration schemes</p> <p>Conserve and enhance existing man made and natural drainage features.</p> <p>Maximise opportunities for the creation of SUDs schemes which contribute to local amenity and habitat creation.</p>	<p>Provisioning</p> <p>Water conservation</p> <p>Regulating</p> <p>Flood control</p> <p>Protection of aquifers</p> <p>Cultural</p> <p>Heritage assets</p> <p>Sense of Place and local distinctiveness</p> <p>Tranquillity</p> <p>Amenity and recreation</p> <p>Biodiversity</p>

Appendix 3: Emerging Proposals



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DISCUSSION

- Site boundary (11.96ha)
 - Land in same ownership
 - - - Public Right of Way (PRoW)
 - ▨ Railway line and 30m buffer
 - Railway station
 - Existing vegetation (retained and enhanced where possible)
 - Flood zone 2
 - Flood zone 3
 - ✳ Listed building
 - Bus stop
 - ~ Rear/side residential boundary
 - ~ Rear/side college boundary
 - ▨ Ancient Woodland and 15m buffer
 - ← Existing access - to be retained, widened and enhanced to provide vehicular access with pedestrian footway
 - ← Proposed emergency access and pedestrian/cycle connectivity to PRoW
 - - - Proposed primary street
 - Proposed recreational routes
 - Active travel route providing access to mainline railway and high street beyond
 - Proposed area for Biodiversity Net Gain (BNG)
 - Proposed additional planting for ecological benefits and BNG
 - ~ Proposed enhanced boundary planting
 - Indicative play area
 - Indicative attenuation basin
 - Proposed public open space
 - Proposed residential developable area (3.49 ha at 35dph = 122 homes)
 - Proposed residential developable area up to 15 storeys (0.67 ha at 30dph = 20 homes)
- N.B. The entire extent shown in this plan is within the High Weald National Landscape*

Rev. A 18/03/2026 Revised proposals to align with LVA

Land at Knelle Road ROBERTSBRIDGE

Constraints and Opportunities Plan

Job ref: 796	Drawing number: SK01	Revision: A
Scale: 1:2500 @ A2		Date: March 2026



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DISCUSSION

- Site boundary (11.96ha)
- Land in same ownership
- - - Public Right of Way (PRoW)
- Robertsbridge Railway Station
- 1 Proposed vehicular and pedestrian access off Knelle Road
- 2 Proposed emergency access
- 3 Proposed connection to PRoW
- 4 Proposed primary street
- 5 Proposed shared surface street
- 6 Proposed private drive
- 7 Proposed area for Biodiversity Net Gain (BNG)
- 8 Proposed additional planting for ecological benefits and BNG
- 9 Proposed enhanced boundary planting
- 10 Proposed landscaped edge to school
- 11 Proposed 15m buffer to Ancient Woodland
- 12 Proposed play area
- 13 Proposed attenuation basin
- Active travel route providing access to mainline railway and high street beyond
- Proposed recreational routes

Rev.	Date	Description
Land at Knelle Road ROBERTSBRIDGE		
Illustrative masterplan		
Job ref: 796	Drawing number: SK02	Revision:
Scale: 1:2500 @ A2	Date: March 2026	



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DISCUSSION

- Site boundary (11.88ha)
- Land in same ownership
- - - Public Right of Way (PROW)
- ▨ Railway line and 30m buffer
- Railway station
- Existing vegetation (retained and enhanced where possible)
- Flood zone 2
- Flood zone 3
- ✳ Listed building
- Bus stop
- ~ Rear/side residential boundary
- ~ Rear/side college boundary
- ▨ Ancient Woodland and 15m buffer
- ← Existing access - to be retained, widened and enhanced to provide vehicular access with pedestrian footway
- ← Proposed emergency access and pedestrian/cycle connectivity to PROW
- - - Proposed primary street
- Proposed recreational routes
- Active travel route providing access to mainline railway and high street beyond
- Proposed area for Biodiversity Net Gain (BNG)
- Proposed additional planting for ecological benefits and BNG
- ~ Proposed enhanced boundary planting
- Indicative play area
- Indicative attenuation basin
- Proposed public open space
- Proposed residential developable area (2.67 ha at 35dph = 93 homes)
- Proposed residential developable area up to 15 storeys (0.67 ha at 30dph = 20 homes)
- Proposed 1 hectare extension to Robertsbridge Community College

Rev.	Date	Description
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Land at Knelle Road ROBERTSBRIDGE

Constraints and Opportunities Plan_Opt 2

Job ref: 796	Drawing number: SK03	Revision:
Scale: 1:2500 @ A2	Date: March 2026	



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N.B The entire extent shown in this plan is within the High Weald National Landscape



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DISCUSSION

- Site boundary (11.88ha)
- Land in same ownership
- - - Public Right of Way (PRoW)
- Robertsbridge Railway Station
- 1 Proposed vehicular and pedestrian access off Knelle Road
- 2 Proposed emergency access
- 3 Proposed connection to PRoW
- 4 Proposed primary street
- 5 Proposed shared surface street
- 6 Proposed private drive
- 7 Proposed area for Biodiversity Net Gain (BNG)
- 8 Proposed additional planting for ecological benefits and BNG
- 9 Proposed enhanced boundary planting
- 10 Proposed landscaped edge to school
- 11 Proposed 15m buffer to Ancient Woodland
- 12 Proposed play area
- 13 Proposed attenuation basin
- 14 Proposed area safeguarded for Robertsbridge Community College expansion
- Active travel route providing access to mainline railway and high street beyond
- Proposed recreational routes

Rev.	Date	Description
Land at Knelle Road ROBERTSBRIDGE		
Illustrative masterplan_Opt 2		
Job ref: 796	Drawing number: SK04	Revision:
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