



Land adjacent to Orchard Close, Icklesham

**Rother Local Plan**

**Development Strategy and Site Allocations**

**Draft (Regulation 18) Version**

Andrew Black Consulting on behalf of  
Chartwell Land and New Homes 2 Ltd

March 2026

**CHARTWELL**

UNLOCKING LAND | BUILDING BEAUTIFUL HOMES

**Project** Land adjacent to Orchard Close,  
Icklesham

**ABC Reference** ABC/0339/07

**Local Authority** Rother District Council

**Client** Chartwell Land and New Homes 2 Ltd

**Issue** Final

**Author** Andrew Black

**Date** March 2026

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## Land adjacent to Orchard Close, Icklesham

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### 1 Introduction

- 1.1 These representations have been prepared by Andrew Black Consulting on behalf of Chartwell Land and New Homes 2 Limited in response to the Rother Local Plan, Development Strategy and Site Allocations Draft (Regulation 18) Version Draft Preferred Policy Options Paper.
- 1.2 Chartwell Land and New Homes 2 Limited is the land owner of the land north of Main Road (adjacent to Orchard Close) in Icklesham which is identified for allocation (under reference IK2) within the local plan. The site and surroundings are described within these representations and technical studies have been undertaken which are referred to throughout these representations and also appended with this document.



*Figure 1 – Site Location Plan*

- 1.3 Chartwell entered into pre-application discussions (ref PE/00054/2025) regarding the development of the sites within its control and has received positive feedback from the council. The principle of development of the southern part of the site is strongly supported by the council. Details of the pre-application discussions are set out within these representations.
- 1.4 Following on from these pre-application discussions, further engagement took place with national highways who have agreed to the proposed access to the site directly from Main Road. Details of these discussions and the technical work undertaken are set out within these representations.
- 1.5 It is considered that the majority of the requirements set out in the plan in relation to development of site IK2 can be met. However, there are a number of modifications



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regarding form of development and access which are considered necessary following on from further technical due diligence and discussions with the council.

- 1.6 These representations are made in the context of the tests of soundness as set out in paragraph 36 of the current National Planning Policy Framework (NPPF). This states that plans are 'sound' if they are:

**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 and other statements of national planning policy, where relevant.

- 1.7 The allocation of the land adjacent to Orchard Close in Icklesham under site reference IK2 within the draft plan is welcomed.
- 1.8 The plan is being brought forward in the context of a historic undersupply of housing in the district and the chronic lack of five year housing land supply under the present plan. This has resulted in a significant shortfall in overall housing but more critically a lack of affordable housing delivery against well-established needs.
- 1.9 It is therefore considered entirely justified for this site to be allocated for development and to come forward in the early part of the plan period to meet this critical need.



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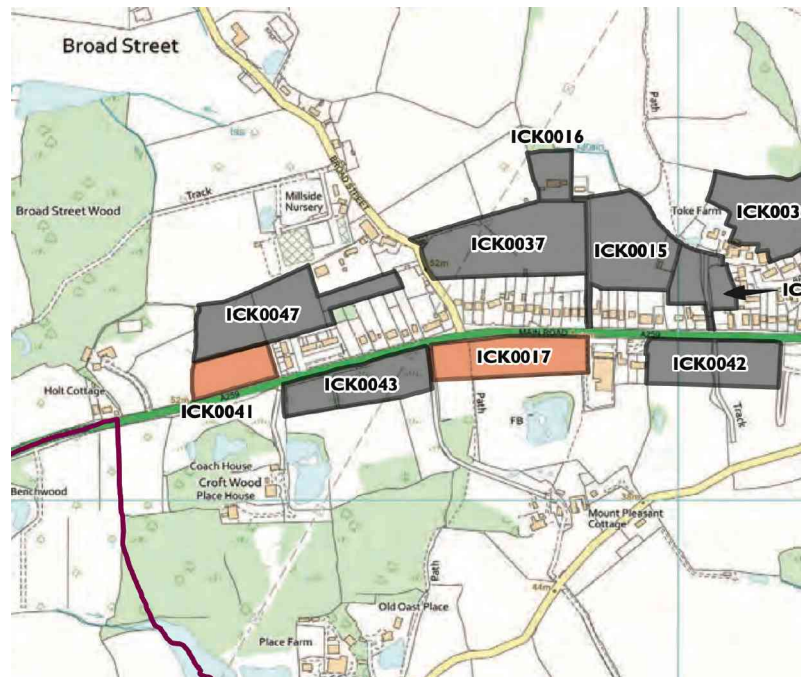


Figure 3 – 2024 HELAA Extract

2.7 The 2024 HELAA set out the following site assessment:

*The site comprises the road-fronting section of a field adjacent to the A259 on the far western edge of Icklesham Village. It adjoins a recently constructed housing exception site comprising 15 affordable dwellings. The site is rather remote from the limited services in Icklesham Village, although there is a footway adjacent to the site and a bus service along the main road. Given the adjacent development, the landscape impact would be limited, and there are few other environmental constraints. The site could be suitable for limited residential development in keeping with the adjoining site.*

2.8 Overall, the site was deemed deliverable for residential development in 2024.

2.9 Chartwell purchased the site following the publication of the 2024 HELAA and subsequently entered into pre-application discussions as set out within representations.

2.10 The Site was assessed then in the latest version of the Housing and Economic Land Availability Assessment (HELAA) as land parcel ICK0050 published in January 2026 .

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Figure 4 – HELAA Extract

2.11 The HELAA sets out the following description for the site :

*The site comprises a field adjacent to the A259 on the far western edge of Icklesham village. It surrounds a recently constructed housing exception site comprising 15 affordable dwellings. The site is rather remote from the limited services in Icklesham village, although there is a footway adjacent to the site and a bus service along the main road. Viewed in the context of the adjacent development and with the inclusion of a sensitive landscaping scheme, the landscape impact of additional development here could potentially be accepted, and there are few other environmental constraints. The site could be suitable for residential development in keeping with the adjoining site if development is significantly offset from the northern boundary.*

2.12 The comments in relation to the technical constraints and requirements are addressed within other sections of these representations.

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### 3. Draft Allocation – IK2

- 3.1 As set out, the site is centrally located to the west of Icklesham close to the other proposed in Icklesham (IK1).

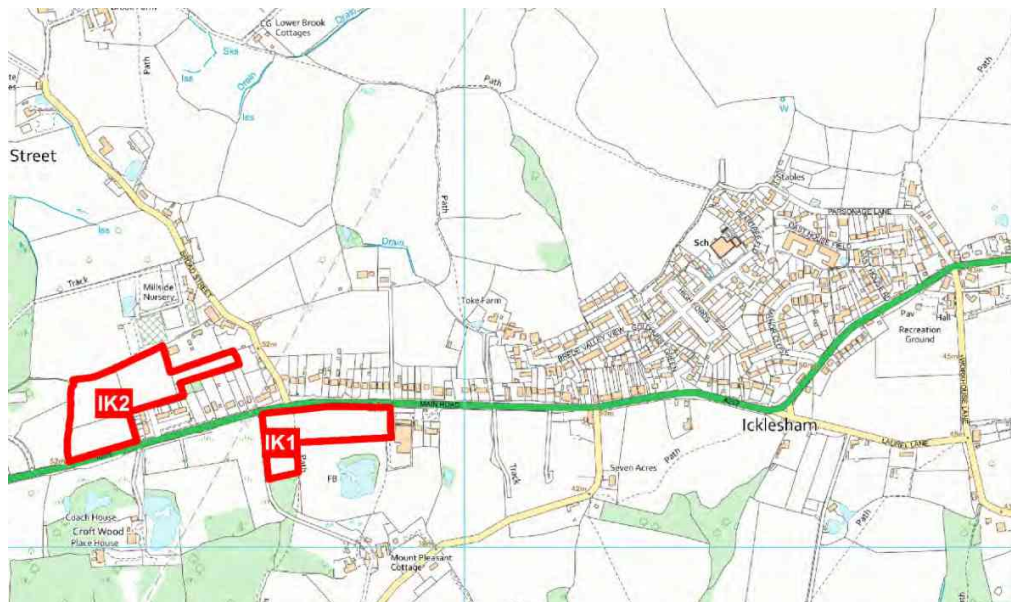


Figure 5 – Proposed Allocations

- 3.2 The draft local plan proposes the allocation of the entire site for up to 32 dwellings on a land area of 0.94ha within the total site area of 2.36 ha.

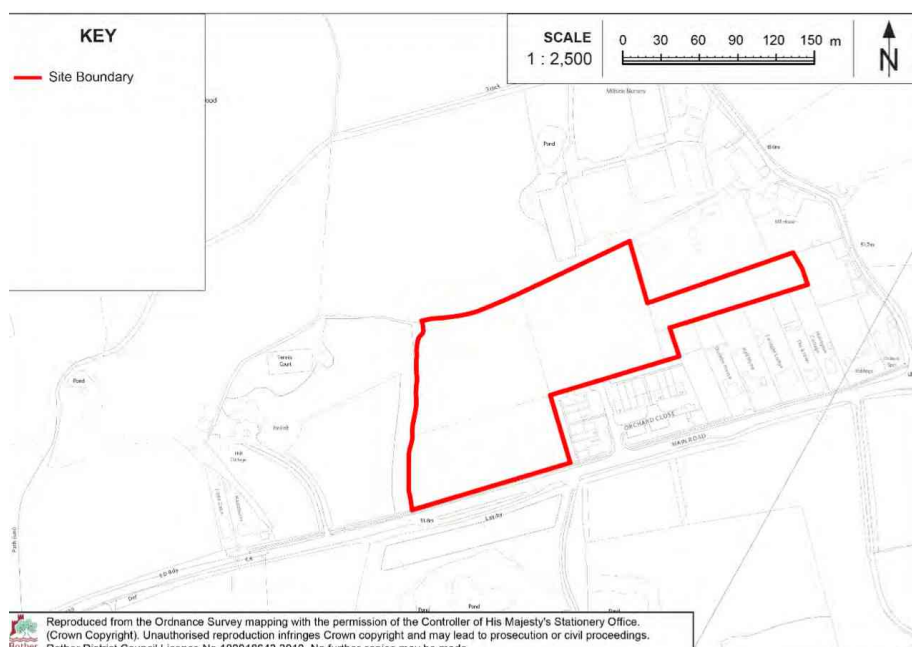


Figure 6 – Site Location Plan IK2

- 3.3 The area which is controlled by Chartwell Land and New Homes as highlighted in figure 1 equates to 1.48ha.



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3.4 Turning to the site allocation text itself, this sets out a number of requirements for development of the site. Each of the criterion from the draft allocation is set out below in bold and comments made against each in turn:

***I) Provide a policy-compliant amount of on-site affordable housing in line with policy HOU2 of the Rother Local Plan***

3.5 The minimum percentage required under policy HOU2 is yet to be confirmed and the explanatory text of the plan states that this will be completed following the regulation 18 consultation. The site is capable of providing a policy compliant amount of affordable housing which will include a mix of dwelling types and tenures.

***II) Include a significant area of green infrastructure, to include public open space and biodiversity net gain, across the northern and eastern parts of the site;***

3.6 The undeveloped part of the site can be used to incorporate significant areas of green infrastructure and biodiversity improvements.

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

3.7 A Preliminary Landscape and Visual Appraisal has been undertaken and is included with these representations in appendix 1.

3.8 The Landscape and Visual Appraisal sets out the following conclusions:

- *Overall the Site does reflect some key characteristics of the High Weald National Landscape and the Brede Valley LCA, in terms of land cover and land use, boundary features and the relationship of the landform and Site character with the rural land to the countryside to the north and west in particular. The Site is also subject to urbanising influences, in particular the neighbouring residential development at Orchard Close and the proximity of the A259.*
- *There are no landscape features within the Site, such as trees and hedges, which would require removal associated should the Site be brought forward for development (with the exception of creation of an access from the A259). The boundary hedge to the A259 forms an important landscape buffer to the A259.*
- *There are more open near and middle distance views towards the Site from the open countryside in the vicinity of Broad Street to the north, in particular from a length of public footpath ICK/21 (see Viewpoints 4 and 5) and from Broad Street itself (see Viewpoint 6). The Site is also partially visible in views from the 1066 Country Walk in the vicinity of Brook Farm. Other residential development (in particular Orchard Close) is a feature of these views and the Site is viewed wholly or partially against this backdrop.*
- *The Site is generally perceived in the context of the existing settlement edge in views from the north but in Views 5 and 6 the land is clearly viewed extending*



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### **v) Ideally include a vehicular access from Orchard Close;**

- 3.13 Chartwell has appointed Motion Consultants to provide a technical highways review of the site. As part of this process, they entered into discussions with National Highways as the A259 (Main Road) falls within their remit rather than East Sussex County Council.
- 3.14 As part of pre-application discussions with National Highways, it was agreed that the optimum access point for the site was through parcel 1 (fronting onto Main Road) as highlighted in figure 5, rather than through Orchard Close.
- 3.15 Furthermore, an access from Orchard Close would not be possible due to sewer infrastructure crossing the site where Orchard Close meets the boundary.
- 3.16 A Highway Note is included with these representations (appendix 2) which sets out the details of the pre-application discussions, the safety risk assessment, stage 1 road safety audit, a copy of the final designer's response and a copy of the revised junction arrangement.

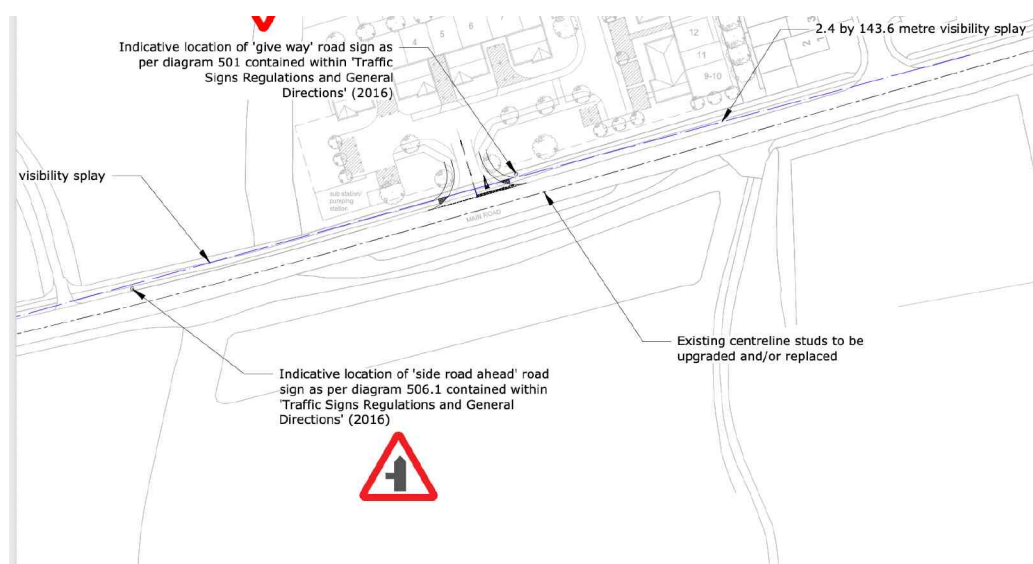


Figure 8 - Proposed Access Arrangement

- 3.17 It is therefore considered that modifications to this requirement are justified in accordance with the technical information submitted with these representations.

### **vi) Include appropriate pedestrian infrastructure inside and outside the site to link to footways on the northern side of Main Road (A259)**

- 3.18 The technical highways information submitted with these representations demonstrate that appropriate pedestrian infrastructure can be provided to link with the footways on the northern side of Main Road.

### **vii) Include no built development in the southern part of the site which is shown to be at risk of surface water flooding;**

- 3.19 The Surface Water flooding covers a very isolated part of the site, and this can be adequately attenuated through the use of SuDS features on any development.

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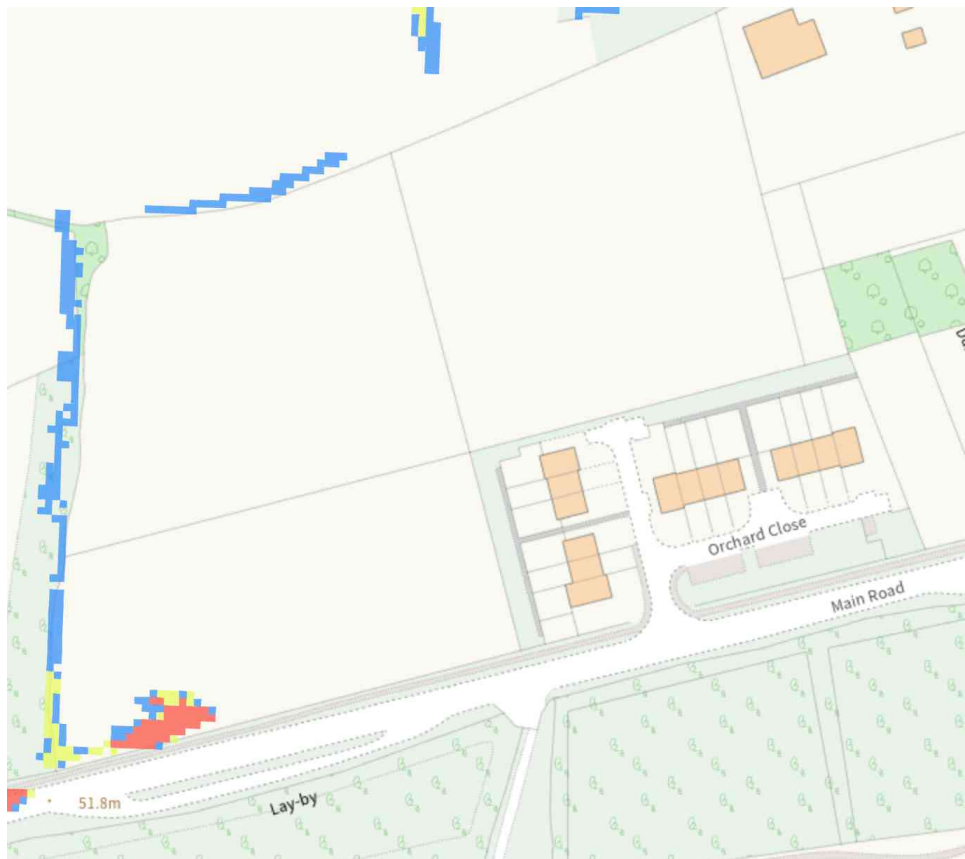


Figure 9 – Surface Water Flooding

**viii) Retain and enhance the existing trees and hedgerows on the boundaries of the site;**

3.20 The indicative masterplan retains and enhances all existing trees and hedgerows on the site.

**ix) Include on-site Biodiversity Net Gain which enhances the Deciduous Woodland and Traditional Orchard Priority Habitats adjacent to the site;**

3.21 There is sufficient room on the site to accommodate BNG alongside the 32 dwellings.

**x) Include Sustainable Drainage features in the northern section of the site in accordance with Policy ENV2 of the Rother Local Plan;**

3.22 As set out, Sustainable Drainage features can be accommodated within the site.

**xi) Make an acceptable connection to the local sewerage system in liaison with the service provider;**

3.23 This is a matter which can be accommodated as part of the submission of an application on the site.

**xii) Include any necessary off-site highway works necessary to make the development acceptable.**



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3.24 This is a matter which can be accommodated as part of the submission of an application on the site.

3.25 The supporting text of the allocation wording for IK2 sets out commentary on the site. This is set out below with submissions made against relevant sections in turn:

*This site comprises sections of two agricultural fields on the northern side of the A259 in Icklesham. It relates well to adjoining development and is screened to some extent in the wider landscape, meaning it is considered suitable for residential development. The site is adjacent to a recently completed residential development, which was constructed as an affordable housing "rural exception site".*

3.26 It is agreed that the site is well related to the adjoining development, and the Preliminary Landscape and Visual Appraisal demonstrates how the site is screened from the wider landscape.

*It is within the High Weald National Landscape and therefore a sensitive form of development is required in line with Local Plan policies. The policy requirements detailed above require the retention and enhancement of existing boundary trees and hedges and also require a large area of open space in the northern part of the site. These measures are required in order to soften the site's visual impact in longer views from the north and maintain the rural setting of this edge of the village.*

3.27 The Landscape and Visual Appraisal demonstrates how development can come forward on the site without harm to the wider National Landscape.

*Environmental and other constraints affecting the site include some Deciduous Woodland Priority Habitat adjacent to the site to the west and Traditional Orchard Priority Habitat to the east and the policy requirements detailed above reflect these.*

3.28 As set out, the proposed masterplan seeks to work with existing environmental constraints.

*Connections to the existing footway infrastructure to encourage active travel are required, as detailed above. Ideally the site should be accessed via the adjoining development, "Orchard Close" in order to avoid the construction of a second vehicular access onto the A259 in close proximity to that site. Initial comments from National Highways support reusing the existing access and requires an assessment to be conducted for any new access.*

3.29 Chartwell has undertaken detailed highway investigation and consultation with National Highways which demonstrates that the optimum access to the site is on the southern boundary. Access to the site from Orchard Close would not be possible due to the presence on of significant foul water infrastructure in this area of the site. It is considered that further modifications to the policy are required to reflect the further technical work undertaken.

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### Illustrative Masterplan and Pre-application Engagement

- 3.30 An indicative masterplan (appendix 3) has been prepared which demonstrates how the parcels within the control of Chartwell Land and New Homes 2 Ltd could come forward for development.

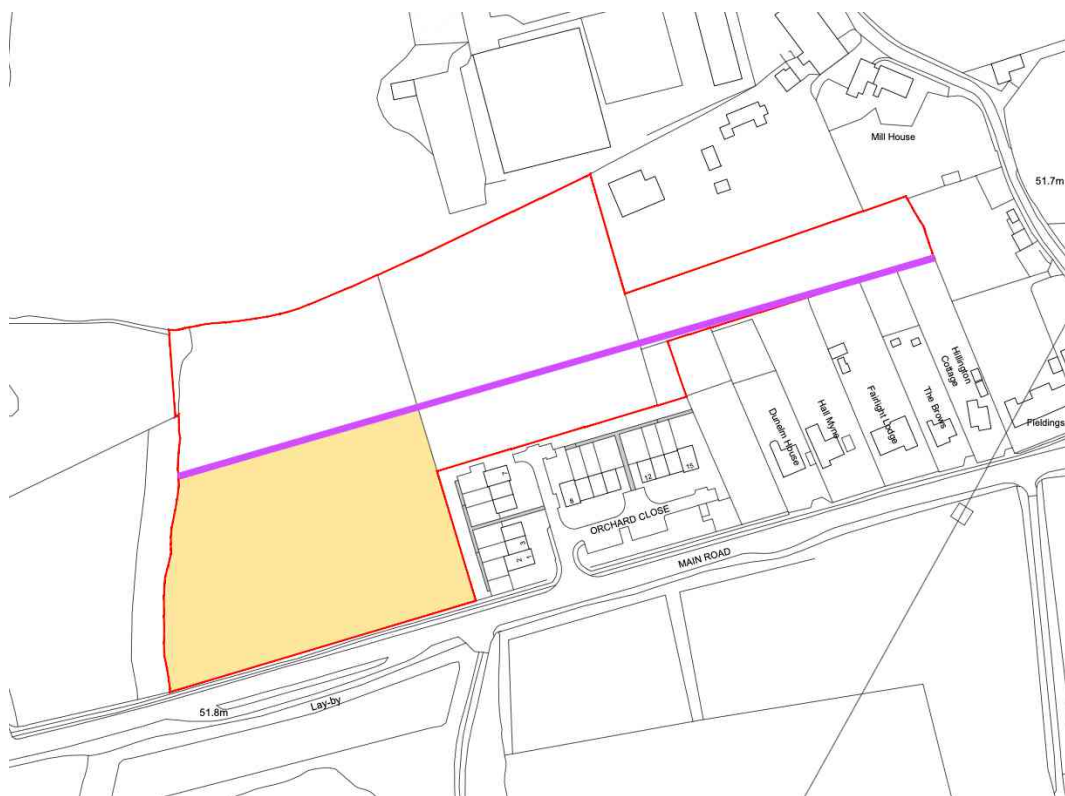


*Figure 10 – Illustrative Masterplan of parcels 1 and 2*

- 3.31 Chartwell held a pre-application with council officers in February 2025. Following the pre-application meeting, minutes were issued to the council and agreed and these are included at appendix 4 of these representations.
- 3.32 As demonstrated within the pre-application minutes, the preference for the council was to for residential development to extend up to the line of the rear boundaries of the existing dwellings which front onto Main Road as this was considered to be a natural extension to the village. This line is shown on the illustrative masterplan as a dotted pink line.
- 3.33 The area of land to the south of pink line, proposed for development within the Illustrative masterplan equates to 0.97ha which is in line with the expected area for development within the wording of the allocation for IK2.

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*Figure 11 – Proposed Development Area of Site (Yellow) – 0.97ha*

- 3.34 The council also expressed a preference that the northern section of the site to be kept open and green as a landscape buffers and could also be used for drainage attenuation basis and BNG.
- 3.35 There was also acknowledgement from the council that access from Orchard Close may not possible due to sewage infrastructure at the point of connection and ownership issues. Following the advice from the council, Chartwell entered into further dialogue with National Highways and the details regarding access are set out within this section.
- 3.36 Overall, it is clear that the southern portion of the land allocated under reference IK2 is deliverable for the entire 32 dwellings as set out within the draft plan. Parcels 1 and 2 are available and deliverable for development in the early part of the plan period but would not prevent development coming forward on other parcels within the identified land.



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### 4. Housing Need and Supply

- 4.1 Section 3 of the draft plan establishes that the housing need for the district, as established by the Government Standard Method is for 912 new homes per annum or 15,504 new homes over the 17 year plan period from 2025-2042.
- 4.2 This represents a significant uplift from the current housing need figure of 335 homes per annum as contained in the Core Strategy (2014).
- 4.3 The need for different dwelling types and sizes is established by the Housing and Economic Development Needs Assessment (April 2024) (HEDNA).
- 4.4 The HELAA and Housing Background Paper establishes that the affordability ratio in Rother has increased steadily from 9.33 in 2011 to a high of 13.82 in 2021. Paragraph 4.8 of the Housing Background Paper sets out that this upward trend is problematic as it demonstrates that house price growth is significantly outstripping wage growth, ultimately making housing more unaffordable for those who live and work within the district and potentially pricing out future local buyers.
- 4.5 The Housing Background Paper also shows concerning trends in relation to homelessness and number on the local authority housing register. Paragraph 4.14 of the paper shows that the number of households presenting themselves as homeless increased in Rother over the period 2017 to 2022, from 199 in 2016/17 to 431 in 2018/19 and 568 in 2022/23. The paper also shows that as of November 2023 the number of households on the local authority housing register was at 1,850 households. It is likely to have continued to increase in the two and half years since this figure was produced.
- 4.6 The HELAA also establishes that, taking into account current and future supply of affordable housing, there is an annual need for 238 affordable dwelling for rent and 87 affordable dwellings for purchase. This gives a net need for 325 affordable homes per year to 2044 in Rother. Paragraph 6.30 of the Housing Background Paper states that this requirement *substantially exceeds recent average delivery of affordable homes and actually exceeds the average number of all dwellings delivered per year in Rother since 2011.*
- 4.7 The latest Housing Land Supply position statement published by the council indicates a very poor level of affordable housing with an average of just 73 affordable housing completions per annum against a requirement of 243.
- 4.8 In terms of recent supply, Rother scored just 43% in the most recent Housing Delivery Test and delivered a total of 843 dwellings against a requirement of 1,967 dwellings.



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Year	Number of homes required	Number of homes delivered
2021/22	490	214
2022/23	740	239
2023/24	737	391
Total	<b>1,967</b>	843

- 4.9 The latest Housing Land Supply position published by the council in December 2024 establishes a deliverable five year housing land supply of 2,940 dwellings against a requirement of 5,592 or 2.63 years. This is a shortfall of 2,652 dwellings over the next five years of the plan period alone.

### Housing Supply

- 4.10 Section 3 of the draft plan sets out the sources of supply which the district will use to meet housing need.
- 4.11 Regarding windfall sites, the HELAA establishes an average delivery of 39 dwellings which has been used in the draft plan.
- 4.12 Paragraph 3.24 of the draft plan establishes that, taking into account existing consents, windfall, and allocations, a housing target of 8,427 units per year can be achieved over the plan period or 495 units per annum. This would represent just 54% of the established housing requirement under the standard method.
- 4.13 This significant shortfall would be greater that being advanced by Three Rivers in their regulation 19 consultation which recently led to the Secretary of State intervening in February 2026 with a holding objection to the progression of the plan. A copy of this letter is attached to these representations at appendix 5 and in the letter the Secretary of State sets out:

*As it stands, your emerging plan proposes to meet only 56 per cent of the local housing needs identified by the standard method, leaving a shortfall of over 5,000 dwellings, with little explanation publicly available to justify this approach.*

*Section 20 of the Planning and Compulsory Purchase Act 2004 (the 2004 Act) requires local planning authorities to only submit a plan when they think it is ready for an independent examination. Your own committee report highlights a high risk that the plan may fail at examination due to the scale of the shortfall in meeting housing need. As a result, I have little confidence that your emerging plan is satisfactory and capable of being found sound or legally compliant at examination.*

- 4.14 The letter to Three Rivers was followed up in March 2026 with a further letter from Matthew Pennycook requiring significant modifications to the plan including allocation of further named sites for development. A copy of this latest letter is also contained in appendix 5 of these representation.



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- 4.15 Also of relevance is the letter from Matthew Pennycook to Hastings Council in February 2026 (also included in appendix 5 of these representations). This reiterates the position of the government that if local authorities cannot meet the identified housing need, then they should revisit their assessments and assumptions about development potential of specific sites.
- 4.16 Given that the shortfall being advanced in the Rother Plan is of a greater percentage and significantly greater actual figure, it is considered that additional sources of housing delivery will be required in order for the plan to be found sound.



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### 5. Development Strategy and Principles

5.1 The development strategy for Rother is split into five spatial sub areas as set out in figure 12 of the draft plan:

- Bexhill;
- Southern Rother and the Hasting Fringes
- Battle and its cluster of connected settlements;
- Rye and its cluster of connected settlements; and
- Northern Rother – the settlements in the north-east of the district.

5.2 The Vision for Battle and Surrounding Settlements is set out in section 6 of the draft plan as follows (with emphasis added):

*Sensitive development will be delivered in the Hastings Fringes where it is well connected to the urban fabric of Hastings, to public and active transport routes, and to key services and facilities. Development will be appropriately designed taking account of the landscape setting of the High Weald National Landscape which wraps around the urban edge of Hastings.*

*Connections and accessibility to settlements in Southern Rother that are near to Hastings will be enhanced through improved public transport, active travel, and highway improvements. This will ensure that wider services and facilities can continue to be accessed, enabling residents to live well locally and have healthy lifestyles. Sensitive small-scale development will be delivered in villages, at densities consistent with the surrounding area, where it is sustainable to do so and does not negatively impact the setting of the High Weald NL.*

*Where greater opportunities for development arise in larger, more sustainable villages, residential development will enable enhancement to public realm and community facilities. Growth will also help support existing facilities and services in the village, ensuring health and wellbeing and community cohesion is maintained and improved.*

*There is potential to deliver 382 dwellings and 5,300 sqm of employment floorspace across the Southern Rother and Hastings Fringes sub-area.*

5.3 The development of the land adjacent to Orchard Close would directly align with the vision for Southern Rother. The delivery of dwellings at Ickenham, forms a central part of delivery of the other dwellings in around Southern Rother and the Hasting Fringes sub-area.

#### **Housing Requirement and Supply**

5.4 Figure 17 of the draft plan sets out the identified level of Housing Growth in Battle and the surrounding settlements as follows:

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Figure 17: Southern Rother and the Hastings Fringes Development Strategy: Housing: Summary

Settlement Area	Housing (dwelling nos) (Existing allocations and sites with planning permission)	Housing (dwellings nos) (Proposed new allocations)	Total housing (dwelling nos)
Rock Lane and Austen Way (Guestling parish)	0	20	20
Westfield	30	40	70
Woodlands Way and Parkwood Road (Westfield parish)	40	70	110
Crowhurst	30	19	49
Icklesham	0	58	58
Fairlight Cove	35	0	35
Guestling Green	0	28	28
Three Oaks	0	12	12
<b>Total Growth</b>	<b>135</b>	<b>247</b>	<b>382</b>

- 5.5 A total of 58 dwellings is proposed from the two allocations at Icklesham and this is considered a fair and deliverable amount given the capacity of the existing settlement to grow.

### Housing Density

- 5.6 The Density Study (2026 Update) forms part of the evidence base for the plan. The study builds upon the previous Density Study (2024) and seeks to justify that compact forms (25-55dph) are consistent with existing local character.
- 5.7 The study concludes that the local plan should apply a minimum density expectation dependent on the accessibility tier that sites are located in. Figure 9 of the plan sets out the density options by settlement type and shows a density range of 25-45 dph in the villages.
- 5.8 It is considered that the development of the land adjacent to Orchard Close can come forward at the upper end of this density scale which would be in context of the character of the adjoining development whilst making best use of the site.

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### 6. Sustainability Appraisal

- 6.1 A Sustainability Appraisal (SA) has been published alongside the draft Local Plan.
- 6.2 The SA scores all sites against the key SA objectives / criteria. The scoring mechanism is set out in figure D of the SA as follows:

Symbol	Explanation
++	Option has potential significant beneficial effect.
+	Option supports the objective, or elements of the objective on balance, although potential beneficial effects may be minor.
o	Option has no effect or is irrelevant; or  Overall effect is neutral insofar as the benefits and drawbacks appear equal and neither is considered significant; or  Uncertain or insufficient information on which to determine the assessment at this stage.
-	Option appears to conflict with the objective on balance and may result in potential minor adverse effects.
--	Option has potential significant adverse effects.

- 6.3 The scoring for site BT7 is set out below with comments made against each in turn and a rating as considered by the promoters of the site.

SA Criteria / Objective	SA Score	SA Methodology Comments for score	Comments from Wates	Suggest Scoring
1a Settlement Sustainability	o	<i>Site located in 'potentially sustainable' location</i>	Whilst it is accepted that sustainable travel options are limited they remain available and it is considered that the settlement of Icklesham is sustainable. Therefore, the rating in relation to this proposed allocation should be positively worded.	+
2a SSSI Impact Risk Zone	-	<i>Site located in an IRZ</i>	TBC on exact location of SSSI Impact Zone	o
2b Ancient Woodland	o	<i>Site is adjacent to (within 50 metres of) ancient woodland</i>	Agree	o



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2c TPOs	0	Site does not contain a TPO	Agree	0
2d Priority Habitats	-	Site is adjacent to priority habitat	This is factually correct but indicative masterplan proposes buffers to proposal would mitigate to neutral impact.	0
3a Decentralised Energy	0	Site not located within a potential heat network cluster	Agree	0
5a EA Flood Risk Map	0	Flood Zone 1	Agree	0
5b Surface Water Flood Risk	-	Contains land with high risk (>3.3% AEP)	Surface Water Flooding limited to area around existing watercourses which will be retained and provided with buffer	0
5c Groundwater flood risk	-	Groundwater levels are between 0.5 and 5m below the ground surface.	Unlikely to be the case for this site due to levels. Further evidence can be provided at the planning application stage.	0
6a Coastal Change Management Area	0	Site is not within a CCMA	Agree	0
7a Access to essential services	-	Site in settlement with limited access to essential services	Agree but given that development in the Icklesham aligns with vision of the plan then SA rating should be neutral	0
7b Access to public open space	0	Site not within 400m of a public open space of any type	Agree	0
7c Access to Public Right of Way	+	Site within 400m of a PRow	Agree	+
11a Heritage Assets	0	Designated heritage asset(s) neither within nor adjacent to the site	Agree	0
11b Area of archaeological potential	0	Site outside of archaeological notification area	Agree	0
12a Agricultural Land Classification	-	Good (Grade 3a) or Moderate (Grade 3b) quality	Agree	-
14a Source Protection Zone	0	Site does not contain land within a SPZ	Agree	0



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15a National Landscape – relative location	–	<i>Site is located within National Landscape</i>	Site is within NL, but proposed masterplan shows impact can be mitigated to minor negative at most	–
15b National Landscape – sensitivity (applies only to sites in the National Landscape)	–	<i>Medium Impact</i>	Agree	–
15d Type of land	–	<i>Site is fully greenfield land</i>	Factually correct but accepted that many types of this site will need to come forward to meet housing need	n/a
17a Existing Employment or commercial uses	0	<i>The site does not contain an existing employment or commercial uses</i>	Agree	0
20a Public Transport access	+	<i>Site within a settlement with access to a train station and good bus service</i>	Agree	+

6.4 Overall, it is considered that the SA demonstrates that development can come forward on the land adjacent to Orchard Close without significant impact to the sustainability objectives. In some areas it is considered that the assumed impact within the SA is actually less than stated and these impacts can be mitigated and/or reduced as part of the preparation of an application on the site.



## **Land adjacent to Orchard Close, Icklesham**

Andrew Black Consulting on behalf of Chartwell Land and New Homes 2 Ltd

### **7. Conclusions**

- 7.1 Overall, the decision to allocate the land adjacent to Orchard Close in Icklesham is logical and justified. Whilst lower in the overall settlement hierarchy, it is clear that the council is highly reliant on the delivery of homes in the early part of the plan period from small and medium size sites.
- 7.2 Chartwell has undertaken pre-application dialogue with the council and the front element of the site, under the control of Chartwell, is appropriate for the delivery of the entire 32 dwellings as highlighted in the allocation.
- 7.3 Chartwell has also undertaken detailed discussions with National Highways regarding the access for the site and an appropriate location has been identified as set out in these representations. Access through Orchard Close, indicated as being preferable within the wording of the allocation for IK2, is not feasible and modifications to the policy are requested to reflect the deliverability of the site.
- 7.4 Further evidence has been prepared and accompanies these representations including a Preliminary Landscape and Visual Appraisal which demonstrates that development can take place on the site without having an adverse impact on the High Weald National Landscape.
- 7.5 Numerous technical surveys have been undertaken since the pre-application meeting in early 2025.
- 7.6 The southern element of the land identified for allocation under IK2 has been demonstrated to be highly suitable for development and is deliverable within the early part of the plan period.
- 7.7 Overall, subject to the suggested modifications set out within these reps, the plan is considered to be sound and is supported.



Land adjacent to Orchard Close, Icklesham

## Appendix 1 – Preliminary Landscape and Visual Appraisal

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# Land to the north and west of Orchard Close, Icklesham

## Preliminary Landscape and Visual Appraisal

December 2024



## Land to the north and west of Orchard Close, Icklesham

### Preliminary Landscape and Visual Appraisal

December 2024

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Figure 3:	Rother District Council HELAA: Icklesham
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## 1. Introduction

This Preliminary Landscape and Visual Appraisal (LVA) has been prepared on behalf of Chartwell Land and New Homes 2 Ltd in relation to land to the north and west of Orchard Close, Icklesham in East Sussex (see Figure 1 below).

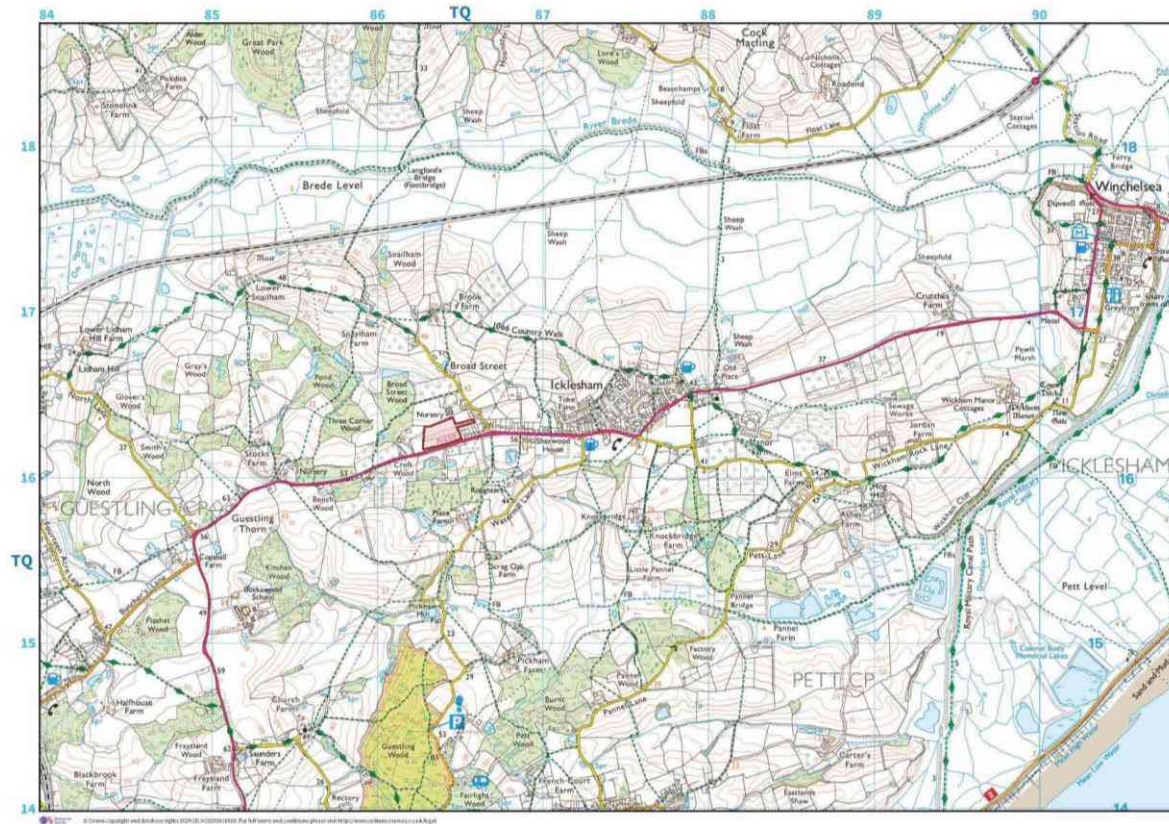


Figure 1: Site Location

The land comprises three fields shown as Parcels 1 (outlined in red), Parcel 2 (blue) and Parcel 3 (yellow) (see Figure 2 overleaf). All of the land, including the village of Icklesham, lies within the High Weald National Landscape.

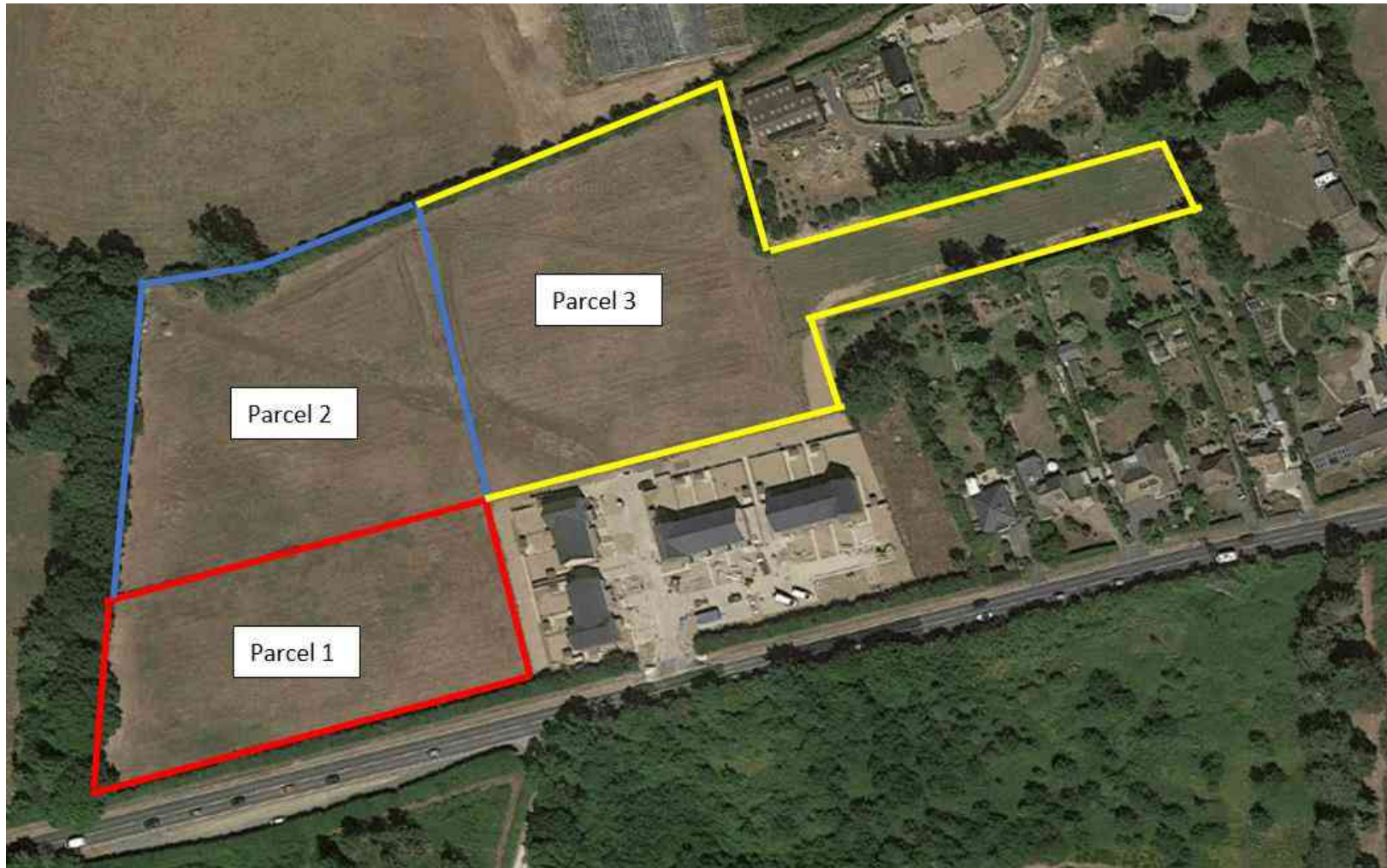


Figure 2: Aerial View

All three land parcels have previously been assessed for allocation for residential development as part of the Rother District Council Housing and Economic Land Availability Assessment (HELAA) (Draft Issue April 2024). See Figure 3 (overleaf).

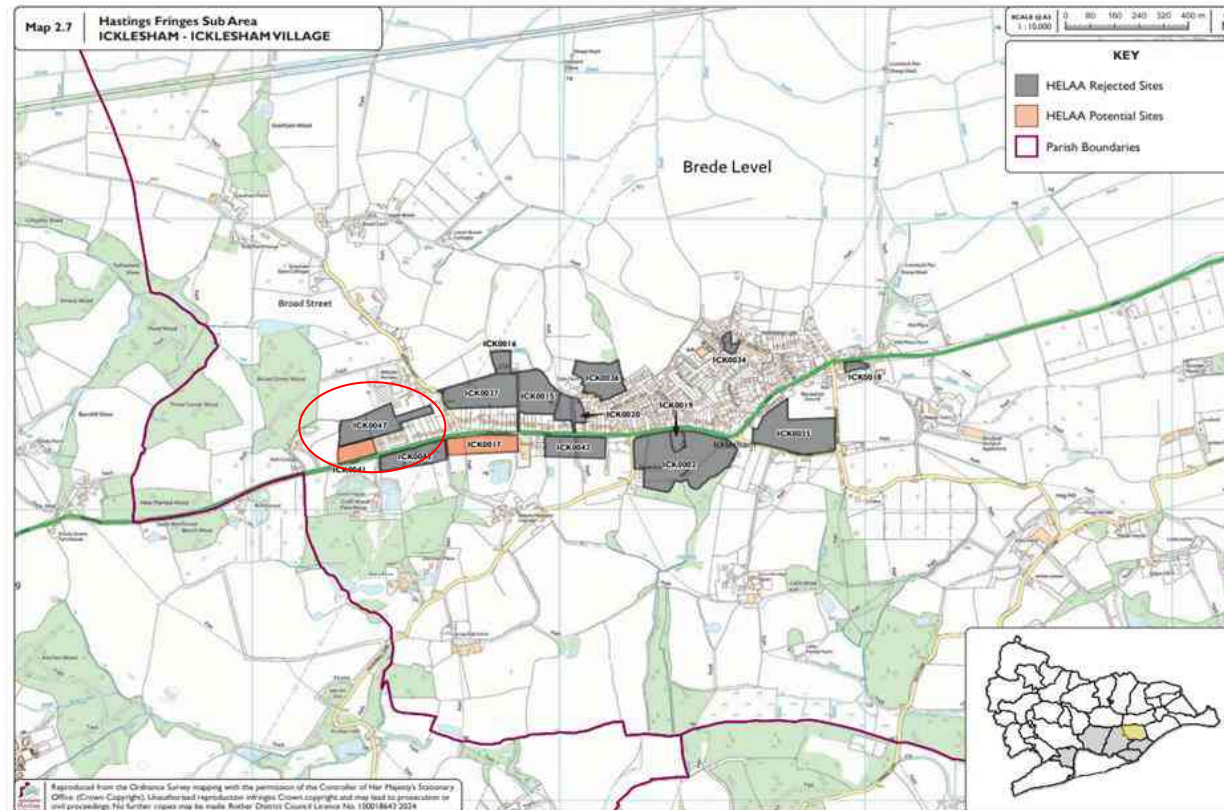


Figure 3: Rother District Council HELAA: Icklesham

Parcel 1 (ICK0041 in the HELAA) was assessed as a site for potential allocation for up to 15 dwellings. The HELAA concluded:

*Given the adjacent development, the landscape impact would be limited, and there are few other environmental constraints. The site could be suitable for limited residential development in keeping with the adjoining site.*

Parcels 2 and 3 were also considered jointly as ICK0047. The HELAA concluded this site should not be brought forward for allocation stating:

*Its development at the scale considered through the HELAA would represent encroachment into a rural area which has long views northwards, impacting on the landscape and character of the National Landscape and the rural setting of the village.*

This Preliminary Landscape and Visual Appraisal (LVA) sets out the landscape and visual context for the Site and includes a Landscape and Visual Analysis, including views illustrating the landscape character of the Site and adjacent area and a series of publicly accessible viewpoints to illustrate the Site's visibility within the wider landscape. The conclusions to this Preliminary LVA set out the key landscape and visual issues to be addressed should all three parcels be considered for residential development allocation.

## 2. Planning Policy Context

The principal landscape designation covering the land is the High Weald National Landscape. This is a National Landscape designation (formerly Area of Outstanding Natural Beauty AONB) affording the highest level of protection to landscapes assessed as of national importance for their natural beauty.

### 2.1 National Planning Policy Framework (December 2024)

The NPPF includes policy relating to nationally protected landscapes. Paragraph 189 states:

*189. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads<sup>59</sup>. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.*

Under Paragraph 190 the NPPF requires *exceptional circumstances* to be demonstrated for major development within a National Landscape.

## 2.2 Rother District Council

Policy GTC9 of the emerging Local Plan (2020-2040) states:

*All development within or affecting the setting of the High Weald National Landscape (AONB) shall conserve and enhance its distinctive landscape character, ecological features, settlement pattern and scenic beauty, having particular regard to the impacts on its character components, as set out in the latest version of the High Weald AONB Management Plan.*

*Development within the High Weald National Landscape should be small-scale, in keeping with the landscape and settlement pattern, and designed in a way that reflects its nationally-designated status as landscape of the highest quality, following the guidance in the High Weald AONB Housing Design Guide and Colour Study. Major development should not take place in the AONB save in exceptional circumstances as outlined at paragraph 183 of the NPPF.*

## 2.3 Neighbourhood Plan

There is no made Neighbourhood Plan for Icklesham Parish.

## 2.4 High Weald AONB Management Plan (2020-2025)

The High Weald AONB Management Plan recognises the balance between the needs to conserve the natural beauty and historic landscape and settlement patterns with housing needs, in particular the need for affordable and social housing. The Plan also identifies *Generic layout and design of new housing developments failing to reinforce AONB character* as one of the top five issues affecting settlements and settlement pattern across the AONB. Objective S2 requires development:

*To enhance the beauty and quality of buildings in the High Weald, and ensure new development reflects intrinsic High Weald character and place-making, embedded with a true sense of place, along with re-establishing the use of local materials and rich colour palette as a means of protecting the environment and adding to local distinctiveness.*

### 3. Published Landscape Character Assessments

Published Landscape Character Assessments provided an important baseline reference to an evaluation of the landscape character and the degree to which an area of land is representative of typical characteristics within a character area.

#### 3.1 National Character Areas

The Site lies within the Wealden Greensand NCA 120 which extends west from the Kent Coast through Kent and into Surrey and Sussex. The summary description of the NCA describes it as follows:

*Around a quarter of the NCA is made up of extensive belts of woodland – both ancient mixed woods and more recent conifer plantations. In contrast, the area also features more open areas of heath on acidic soils, river valleys and mixed farming, including areas of fruit growing.*

#### 3.2 East Sussex County Landscape Assessment 2015

The Site lies within the Brede Valley as described in the East Sussex County Landscape Assessment (2015). The extract for the High Weald is included as Appendix 2 to this report.

The LCA describes the Current Condition of the Brede Valley:

*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. Orchards have declined and many disappeared so that associated Oast houses have been converted to residential uses. Agricultural change has led to some gentrification of the rural landscape and villages. As with most of the High Weald landscape the historic field patterns of small fields and significant hedgerows remain intact.*

The Brede Valley describes key characteristics of the LCA as follows:

- *The broad valley of the River Brede with a flat valley floor enclosed by relatively steep slopes.*
- *A sense of tranquillity away from the main settlements and roads.*
- *Wide vistas from the enclosing ridges across the river valley floodplain.*
- *Few detracting elements.*
- *Well wooded sides slopes with scattered farmsteads and orchards.*

- *River levels and marshes criss-crossed by reed fringed ditches or 'sewers'.*
- *Extensive areas of Semi-Natural Ancient deciduous woodland around the valley head to the west of the area.*
- *Scattered areas of Semi natural ancient woodland on the valley slopes, many of which are ghyll woodlands, a key characteristic of the High Weald.*
- *To the south west of the main valley a belt of undulating countryside extends to the Battle to Hastings ridge.*
- *Lines of Italian poplars planted as wind breaks are an introduced and characteristic feature.*
- *Indigenous characteristic tree species are Oak and ash with sweet chestnut on drier slopes. Beech and pine also feature locally and other exotic specimens are found in gardens and villages.*
- *Villages and their churches perched on the slopes overlooking the valley, notably Brede, Udimore and Icklesham.*
- *Oast houses are characteristic and scattered on the slopes of the valley, many now converted into houses.*
- *Powdermill Reservoir to the north of the valley is largely concealed by woodland.*
- *Significant historic moated manor houses at Snailham and Court Lodge at Udimore, Crowham in Westfield and Brede Place in Brede.*
- *The historic designed landscape and important archaeological site of Beauport Park lies to the south of the area.*
- *Historic parkland at Brede Place and Pestalozzi children's centre in Sedlescombe.*
- *Swans, herons and other wetland birds are very much features in the landscape.*
- *Caravan and chalet developments which reflect the attractiveness of the area for holiday makers.*
- *Flood defence works and engineering structures which detract from the naturalness of the river valley.*
- *Urban fringe intrusions around the edges of Battle and Hastings including pylons, industrial units, housing and horticultural developments.*
- *Much of the open valley is free of roads and traffic, but four A roads cross the valley A2100, A21, A28 and the A259.*
- *These are linked by the B roads which traverse the enclosing ridges and link the villages.*
- *Winding and very narrow sunken country lanes with steep gradients.*
- *The south coast railway cuts across the south east part of the valley.*

## 4. Landscape and Visual Analysis

Key points of the Landscape and Visual Analysis are summarised in Figure 4.

### 4.1 Landscape Character

The Site lies at the western end of the village of Icklesham. Icklesham village has a strong linear character with the bulk of the village lying to the north of the A259. Icklesham is located on a broad, undulating ridge. The land falls to the north towards the River Brede and to the south to an area of undulating land. The ridge is characterised by irregular medium to large fields, mostly under grazing or orchards bordered by tall mature hedges with a number of larger blocks of woodland. There are many narrow sunken lanes and a number of farms and larger individual dwellings set into the surrounding countryside.

The main parts of the Site currently comprise a single L-shaped field, under grazing (see Viewpoints 1A and 1B). The field is sub divided by post and wire fencing. The OS mapping suggests there may have been former field boundaries sub dividing the land. The central and southern parts of the land parcel are relatively flat with the land falling gently northwards in the northern parts of the Site.

The land parcel is enclosed to the west by an area of mature woodland. Much of the southern boundary is defined by a tall native species hedge which separates the Site from the busy A259 (see Viewpoint 2). Orchard Close is located to the south east of the Site. The boundary to Orchard Close is very open with little planting and the proximity and prominence of this new residential development influences the character of the land. There are a number of residential properties on Broad Street with mature gardens to the east. The northern boundary is defined by a native species hedge. Much of the land immediately to the north comprises glass houses associated with a former nursery. Further north there are orchards and grazing land with a number of farms and larger individual properties on Broad Street in mature gardens set in an undulating landscape overlooking the valley of the River Brede.

### 4.2 Visual Amenity

The land lies on the western edge of the village of Icklesham and occupies a potentially prominent location towards the crest of the ridge. Tall hedges and woodland prevent any views to the Site from the west and south (see Viewpoint 2 from the A259). There are also very limited views from the main areas of the settlement and Broad Street to the east (Viewpoint 3).

As illustrated in Viewpoint 1 the land falls to the north and there are potentially extensive views towards the Site from the areas around Broad Street and longer views across the Brede Valley.

Footpath ICK/21 runs west from Broad Street toward Broad Street Wood, roughly 150 metres north of the northern Site boundary. Viewpoints 4 and 5 show views from the footpath towards the Site. In both views the residential development at Orchard Close is highly prominent set against the skyline, with little or no planting to soften the effects. The glasshouses are also a prominent feature.

Further north there are more expansive views towards the village edge, including the Site, from Broad Street (see Viewpoint 6) and also from the 1066 Country Walk (ICK/2) in the vicinity of Brook Farm (Viewpoint 7).

The views from Broad Street (Viewpoint 6) show the western edge of the village and again the development at Orchard Close is a prominent skyline feature albeit softened more by vegetation. The Site extends west in the view and forms part of the rural setting to the village.

In the longer distance view from the 1066 Country Walk (Viewpoint 7), the Site itself is largely hidden below the shallow ridge at Broad Street. Built form on the northern and western fringes of the village and along Broad Street is set into the rural landscape. The buildings at Orchard Close are, however, once again prominent features on the skyline.

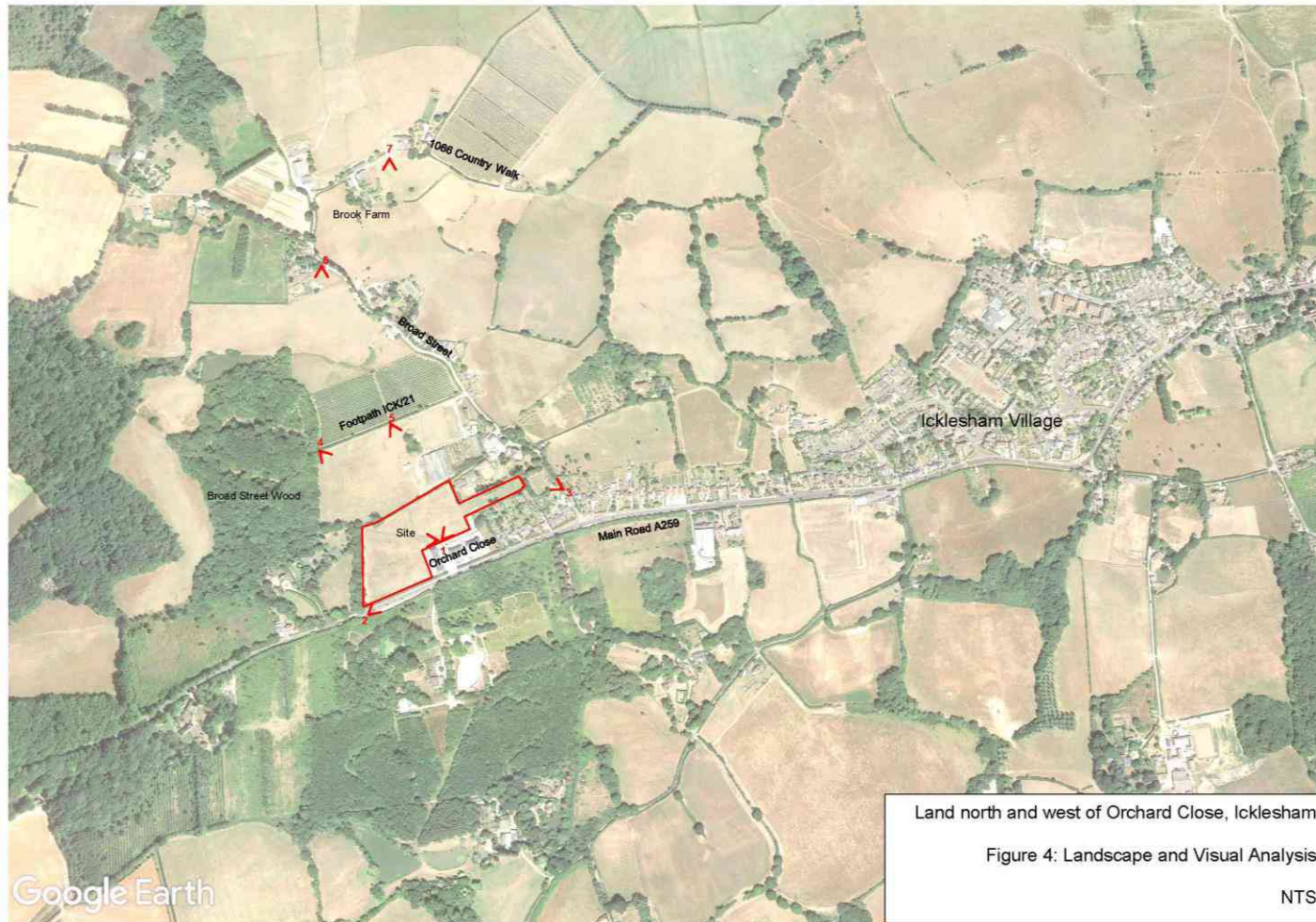
### 4.3 Landscape Character and Visual Analysis

The Site itself comprises an area of grazing on smaller fields typical of the surrounding area. The Brede Valley is described as an *unspoilt and tranquil rural landscape* but the character area description recognises the influence of major roads including the A259 and settlement edges on this character. The A259 borders the southern edge of the site and although separated by a tall, native hedge influences character and tranquillity. Similarly the recent Orchard Close development, whilst relatively small, is prominent and exposed, located on the Site boundary and often perceived against the skyline in particular in views from the open countryside to the north. Whilst the Site reflects wider rural land use and character, the proximity to the settlement edge and the A259 does influence rural character. The abandoned glass houses also detract from the character and condition of the landscape. The Site does, therefore, reflect characteristics of the Brede Valley Landscape Character Area and the wider National Landscape in terms of land use and cover, landscape pattern and some remaining boundary features. The land is also perceived from neighbouring areas of open countryside to the north. The neighbouring residential uses, in particular the proximity and harsh residential edge associated with Orchard Close, and the proximity of the A259 influence and detract from this character.

The Site is visually contained with no views across the Site from the west, south and east (with the exception of a view from the Site boundary in Orchard Close (Viewpoint 1)). The boundary hedge to the A259 (Viewpoint 2) is an important landscape buffer between the Site and the road. More expansive views towards the Site can be gained from the open countryside in the vicinity of Broad Street to the north (Viewpoints 4 to 7). These are predominantly rural views towards the settlement edge. Built form on the settlement edge is a feature of these views, in particular Orchard Close which is a prominent skyline feature. The Site is generally perceived in the context of the existing settlement edge in

views from the north, but in Views 5 and 6 the land is clearly viewed extending beyond the settlement edge and has a stronger relationship with the neighbouring countryside as opposed to the settlement.

There are potential longer distance views from across the Brede Valley but it is not anticipated that the Site would be discernible in these views.





<p>Date: 06/12/2024 OS Grid Ref: TQ 86430 16253 Altitude: 52 m Distance to Site: 0 m</p>	<p>Viewpoint 1A Near distance view north west across the Site from Orchard Close</p>
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<p>Date: 06/12/2024</p> <p>OS Grid Ref: TQ 86430 16253</p> <p>Altitude: 52 m</p> <p>Distance to Site: 0 m</p>	<p>Viewpoint 1B</p> <p>Near distance view north east across the Site from Orchard Close</p>
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<p>Date: 06/12/2024</p> <p>OS Grid Ref: TQ 86301 16149</p> <p>Altitude: 52 m</p> <p>Distance to Site: 10 m</p>	<p>Viewpoint 2</p> <p>Near distance view north east along Main Road (A259) showing the southern Site boundary.</p>
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<p>Date: 06/12/2024</p> <p>OS Grid Ref: TQ 86649 16324</p> <p>Altitude: 54 m</p> <p>Distance to Site: 150 m</p>	<p>Viewpoint 3</p> <p>Near distance view north west along Broad Street towards the eastern end of parcel 3.</p>
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<p>Date: 06/12/2024</p> <p>OS Grid Ref: TQ 86224 16451</p> <p>Altitude: 43 m</p> <p>Distance to Site: 175 m</p>	<p>Viewpoint 4</p> <p>Near distance south east towards the Site from Footpath ICK/21.</p>
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<p>Date: 06/12/2024</p> <p>OS Grid Ref: TQ 86339 16477</p> <p>Altitude: 40 m</p> <p>Distance to Site: 145 m</p>	<p>Viewpoint 5</p> <p>Near distance south towards the Site from Footpath ICK/21.</p>
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<p>Date: 06/12/2024</p> <p>OS Grid Ref: TQ 86270 16780</p> <p>Altitude: 43 m</p> <p>Distance to Site: 475 m</p>	<p>Viewpoint 6</p> <p>Near distance south towards the Site from Broad Street.</p>
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<p>Date: 06/12/2024</p> <p>OS Grid Ref: TQ 86404 16998</p> <p>Altitude: 36 m</p> <p>Distance to Site: 650 m</p>	<p>Viewpoint 7</p> <p>Middle distance view south towards the Site from the 1066 Country Walk in the vicinity of Brook Farm</p>
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## 5. Discussion and Landscape Strategy

The Site and the whole of the village of Icklesham are located in the High Weald National Landscape. As a consequence any residential development within and around the village would be located within the National Landscape and required to meet the exacting policy requirements associated with development within a nationally protected landscape. The High Weald Housing Design Guide<sup>1</sup> provides guidance on the siting, layout and design of residential development within the National Landscape and should inform any proposals within the National Landscape. This Preliminary Appraisal has identified a number of constraints and opportunities to inform a landscape strategy for the Site. The main conclusions are summarised below.

- Overall the Site does reflect some key characteristics of the High Weald National Landscape and the Brede Valley LCA, in terms of land cover and land use, boundary features and the relationship of the landform and Site character with the rural land to the countryside to the north and west in particular. The Site is also subject to urbanising influences, in particular the neighbouring residential development at Orchard Close and the proximity of the A259.
- There are no landscape features within the Site, such as trees and hedges, which would require removal associated should the Site be brought forward for development (with the exception of creation of an access from the A259). The boundary hedge to the A259 forms an important landscape buffer to the A259.
- There are more open near and middle distance views towards the Site from the open countryside in the vicinity of Broad Street to the north, in particular from a length of public footpath ICK/21 (see Viewpoints 4 and 5) and from Broad Street itself (see Viewpoint 6). The Site is also partially visible in views from the 1066 Country Walk in the vicinity of Brook Farm. Other residential development (in particular Orchard Close) is a feature of these views and the Site is viewed wholly or partially against this backdrop.
- The Site is generally perceived in the context of the existing settlement edge in views from the north but in Views 5 and 6 the land is clearly viewed extending beyond the settlement edge and has a stronger relationship with the neighbouring countryside as opposed to the settlement.

The principal impact of development on the landscape resource would be the loss of an area of grazing land and a limited amount of tree loss associated with creation of the access. All other boundary features should be retained. Development on the Site would only really impact on views towards Icklesham from the open countryside to the north in the vicinity of Broad Street. Existing residential development is a feature of these views but in some key views, in particular the view from Broad Street hamlet (Viewpoint 6), development of the western parts of the Site

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<sup>1</sup> <https://highweald.org/guidance/planning-and-development/design-guide-colour-study/>

would be perceived as an extension to the existing settlement edge. Linear development along the A259 is, however, a characteristic feature of the village. Development would, however, extend the settlement into a largely undeveloped area with a predominantly rural character.

The principal landscape and visual issues to consider in order to minimise landscape and visual effects as part of a future landscape strategy would be:

- Retain and strengthen all boundary features, in particular the southern hedge to the A259 and the northern boundary hedge. It is anticipated that an access would be created from the A259 which would involve the removal of a short section of hedge;
- Concentrate development in the central and eastern parts of the Site where it would be perceived in the context of the existing development in Orchard Close (although if ICK0041 is allocated this would extend built form along the A259);
- Ensure any future application is supported by clear height parameters and visualisations to demonstrate roof lines against the existing built form;
- Adhere to guidance set out in the High Weald Housing Design Guide to inform layout, design and materials and the creation of a strong landscape setting;
- Create a strong landscape infrastructure within any proposed development to break up the perception of built form, in particular in views from the north;
- Create a softer settlement edge, in particular along the northern boundary, through strengthening of all boundary features;
- Concentrate open space and SuDS features along the lower, northern Site fringes to create a strong landscape buffer and enhance the settlement edge;
- Retain the narrow rectangular area at the eastern end of parcel 3 as open space and a landscape buffer to neighbouring properties;
- Enhance biodiversity value in particular along the Site boundaries to contribute to the wider wildlife network.
- Strong emphasis in the use of native species in all planting.

Land to the north and west of Orchard Close, Icklesham  
Preliminary Landscape and Visual Appraisal  
December 2024

Land Management Services Ltd  
9 Park Avenue  
Hassocks  
BN6 8LT



Land adjacent to Orchard Close, Icklesham

## Appendix 2 – Technical Highway Note

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## Highway Note

Site: Land North of the A259 Main Road in Icklesham  
Prepared by: DM  
Approved by: DM  
Date: 12 March 2026

## 1.0 Summary of Discussions with National Highways

### Introduction

- 1.1 This technical note has been prepared to provide a summary of the relevant highway matters relating to a proposal to construct 26 residential dwellings on land north of the A259 Main Road in Icklesham.
- 1.2 The following paragraphs summarise the extent of work undertaken to date, focusing on discussions that have been held with National Highways. This reflects the site access being located on the A259 which is part of the Strategic Road Network and managed by National Highways and not East Sussex County Council.

### Pre-application Response

- 1.3 A pre-application note was submitted to National Highways on 3<sup>rd</sup> April 2025. Pre-application feedback was received from National Highways via an email dated 23<sup>rd</sup> April 2025, a copy of which is attached as **Appendix A**.
- 1.4 It is noteworthy that at the time of the pre-application taking place, the proposals sought to construct 51 residential dwellings. This has since reduced to the current 26 dwellings. Whilst this does not change the need to provide a compliant access junction, it does reduce the potential scope for further application work (namely junction capacity testing) suggested in the above response.

### Safety Risk Assessment

- 1.5 At the request of National Highways, a Safety Risk Assessment was undertaken in September 2025, a copy of which is contained within **Appendix B**. Five potential hazards associated with the proposed activity were identified, with a number of measures proposed to address the hazards. These included:
- ▶ It is recommended that the 2.4 by 160 metre visibility splays are secured and maintained;
  - ▶ Line markings are provided to denote the edge of the major road and centre of the minor road; and give way symbol marking and/or signage are provided to warn drivers on the minor road that they are approaching a junction;
  - ▶ Vehicle swept path analysis is carried out and any adjustments to the geometry are implemented as necessary to ensure that two way vehicle movements can be accommodated; and
  - ▶ A dropped kerb crossing point with tactile paving be provided at the bellmouth junction.

### Stage 1 Road Safety Audit

- 1.6 The Safety Risk Assessment was included in an Audit Brief and submitted to the independent Road Safety Auditors (Gateway RSE) to undertake the safety audit. In addition to the Safety Risk Assessment, traffic survey data and collision data were submitted to inform the audit.
- 1.7 A copy of the Stage 1 Road Safety Audit is attached as **Appendix C**. The audit made several recommendations similar to the Safety Risk Assessment. A Designer's Response was prepared by Motion, which sought to address the comments raised. The design of the access junction and appropriate mitigation has been amended to meet the audit request, which was accepted by both the auditors and National Highways.
- 1.8 A copy of the final Designer's Response is attached as **Appendix D**. This included the following measures:

- ▶ Amended junction design to accommodate the largest vehicle (an 11.4 metre refuse vehicle);
  - ▶ Inclusion of dropped kerbs and tactile paving at the junction; and
  - ▶ Suitable give-way signage and junction warning sign, alongside improved centre line road studs.
- 1.9 A copy of the revised access junction arrangement and swept path analysis is included in **Appendix E**.
- 1.10 The final Designers Response was agreed and signed by National Highways on 16<sup>th</sup> January 2026.

## **Appendix A**

National Highways Pre-Application Response

David McMurtary

---

From: Darren Kirkman <Darren.Kirkman1@nationalhighways.co.uk>  
Sent: 23 April 2025 15:08  
To: David McMurtary  
Cc: Planning SE  
Subject: National Highways Response re (our ref NH/25/10664) Pre-Application Advice - Residential Site in Icklesham

Dear Mr. McMurtary

Thank you for your email dated 3 April 2025 requesting pre-application advice for Land North of the A259 Main Road in Icklesham.

We have reviewed the Highways Note provided, and have the following comments. Our suggested action points are **underlined in bold**.

### **1. Policy Context**

We note that Rother District Council is in the process of updating its Local Plan for the period 2020 to 2040. The development site is not allocated within the plan, however, Circular 01/2022 requires that the principle of creating new connections on the SRN be identified at the plan-making stage in circumstances where an assessment of the potential impacts on the SRN can be considered alongside whether such new infrastructure is essential for the delivery of strategic growth. We would note that there is a general presumption against new connection with the SRN; sections 19, 20, 21 and 43 and 48 of 01/22 are of particular relevance.

In light of the above, we **recommend that the applicant addresses the following points prior to the preparation of a Transport Assessment [TA]:**

#### **Justification of Access Need:**

Provide a clear justification for the necessity of the new access, including its role in supporting strategic growth or development.

#### **Exploration of Alternatives:**

Demonstrate that all reasonable alternatives to new access, such as utilising existing junctions or promoting sustainable transport options, have been thoroughly explored and exhausted.

#### **Sustainability Measures:**

Outline all reasonable measures to promote modal shift, walking, cycling, public transport, and shared travel to reduce car dependency and how these are exhausted.

Highlight how the development will enhance community connectivity and accessibility by sustainable transport modes.

#### **Safety and Compliance:**

Demonstrate compliance with the Design Manual for Roads and Bridges (DMRB) requirements, including conducting a safety risk assessment.

Provide a preliminary design (based upon accurate, topographical information) and Stage 1 Road Safety Audit to address road safety considerations.

### **2. Transport Assessment**

**Assuming that the provision of a new connection to the SRN can be satisfactorily justified, the TA must refer to and fully adhere to policies set out in DfT Circular 01/2022.**

### Development Vision

**The forthcoming TA should incorporate the vision for the development, prepared in accordance with the requirements of DfT Circular 01/2022 and reaffirm how the vision will be realised.**

Once the vision and any supporting travel planning initiatives are determined, the assessment of residual transport impacts should be undertaken in line with the Circular 01/2022.

### 3. Access and Layout

The Highways Note states that the design of the connection and the visibility splays will be provided in accordance with guidance contained within DMRB, with speed surveys undertaken either side of the junction informing the approach speeds. We would note that the Design Manual for Roads and Bridges is a comprehensive set of standards and advice notes, as well as guidelines for the design, assessment, and operation of road infrastructure.

**The applicant should ensure that all works on the SRN are DMRB compliant and that any departure from standards is identified, applied for and agreed in advance of the determination of the planning application.**

The speed limit on Main Road immediately adjacent to the application site is 40 mph. However, the national speed limit commences relatively close to the site, some 80m distant from the access to the west. The Highways Note states that an alternative access further east is also 'possible', to allow a visibility splay of 215 m to be achieved, in case the first option is not suited to the recorded speeds.

This statement suggests some doubt regarding the ability to achieve DMRB requirements. In this regard, we note that from a desk-based inspection of the Main Road, land boundaries may preclude achieving a 215m visibility splay to the west of the illustrated access position. Further, we note that, irrespective of speed surveys, the connection should be designed to achieve the requirements set out in the DMRB, including meeting visibility standards.

Therefore:

**A full topographical survey will be required to demonstrate that visibility can be achieved for any access location, in both the vertical and horizontal planes; the location of the access relative to other access points and the layby opposite, should be considered relative to DMRB standards and road safety; and, a WCHAR Walking, Cycling and Horse-Riding Assessment and Review will also be required.**

### 4. Vehicle Movements Servicing and Refuse Collection

The Highways Note states that the site layout is designed to accommodate large vehicle manoeuvrability without affecting the movement of passing vehicles. Separately, servicing and refuse collections are to be undertaken off-street, with the site layout designed to allow for a refuse vehicle to turn on-site and return to Main Road in forward gear.

**The Applicant must submit a vehicle swept path analysis for review.** This analysis is crucial to ensuring that the access layout and internal road network can accommodate all likely vehicle movements safely and efficiently without detriment to the operation of the SRN.

### 5. Stage 1 Road Safety Audit

We note that a Stage 1 Road Safety Audit [RSA1] will be commissioned and undertaken in accordance with DMRB GG119. **The RSA1 should be undertaken prior to the submission of**

**the planning application, and any observations from the RSA should be addressed in the design process and resolved prior to the determination of the planning application.**

## **6. Collision Analysis**

The Highways Note does not reference any collision analysis in the vicinity of the application site. **The applicant should submit an analysis of the injury accident records on the public highway in the vicinity of the site access for the most recent 5-year period for which accident data is available.** The assessment should include collision analysis and causation; it should identify any existing road safety issues that have the potential to be exacerbated by the traffic generated by the proposed development

## **7. Trip generation and Capacity Assessment**

The Highways Note states that trip rates will be derived from TRICS, with an initial review indicating approximately 30 two-way vehicular trips in the AM and the PM peak hours, which the note classifies as imperceptible in terms of impact on the SRN. **We await the outcome of more detailed TRICS analysis and note that this will represent a pre-vision scenario. However it can reasonably be anticipated that capacity assessment will be required for the site access junction.**

## **8. Assessment scenarios**

In addition to the need for a calibrated and validated base year model, we note that **in accordance with paragraph 50 of the Circular 01/2022, assessments should be conducted at an opening year to include trips generated by the proposed development, forecasted growth, and committed development. As the proposal is not included in the local plan, the assessment needs to include all relevant development that is consented or allocated over the entirety of the plan period.**

**There is a need to agree the committed developments with the LPA and to then provide this information to National Highways for review, with evidence of the LPA's acceptance.**

## **9. Construction Environmental Management Plan**

Considering the scale and location of the proposed development, at the appropriate stage of the planning process National Highways recommends a planning condition in relation to CEMP matters

I trust that this response is helpful. To discuss this or any other application with National Highways, please contact us at [planningse@nationalhighways.co.uk](mailto:planningse@nationalhighways.co.uk)

Kind regards,

**Darren Kirkman**, Assistant Spatial Planner  
South East Region, Operations Directorate  
National Highways

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## **Appendix B**

Safety Risk Assessment

## Safety Risk Assessment

Site: A259 Main Road, Icklesham, East Sussex  
Prepared by: J Smith  
Approved by: D McMurtry  
Date: 19th September 2025

**motion**  
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### 1.0 Introduction

- 1.1 Motion has been instructed to act on behalf of Chartwell Property Group with respect to a proposed residential development consisting of 26 dwellings on land north of the A259 Main Road, at Icklesham, East Sussex. The proposals include highway works consisting of a new vehicular access in the form of a simple priority junction on Main Road, located approximately 120 metres to the west of Orchard Close.
- 1.2 The development site is located on the western edge of the village of Icklesham, on the northern side of the A259 as indicated in the location plan at Figure 1.1 below. In this location the A259 Main Road is an unlit two-way single carriageway road with a footway on the northern side. It has a carriageway width of approximately 7.3 metres and is subject to a speed limit of 40mph at the location of the proposed access, increasing to the national speed limit at a point approximately 80 metres to the west of the proposed access. In the vicinity of the proposed access there is an existing layby on the southern side of the road, signed "for light vehicles only".

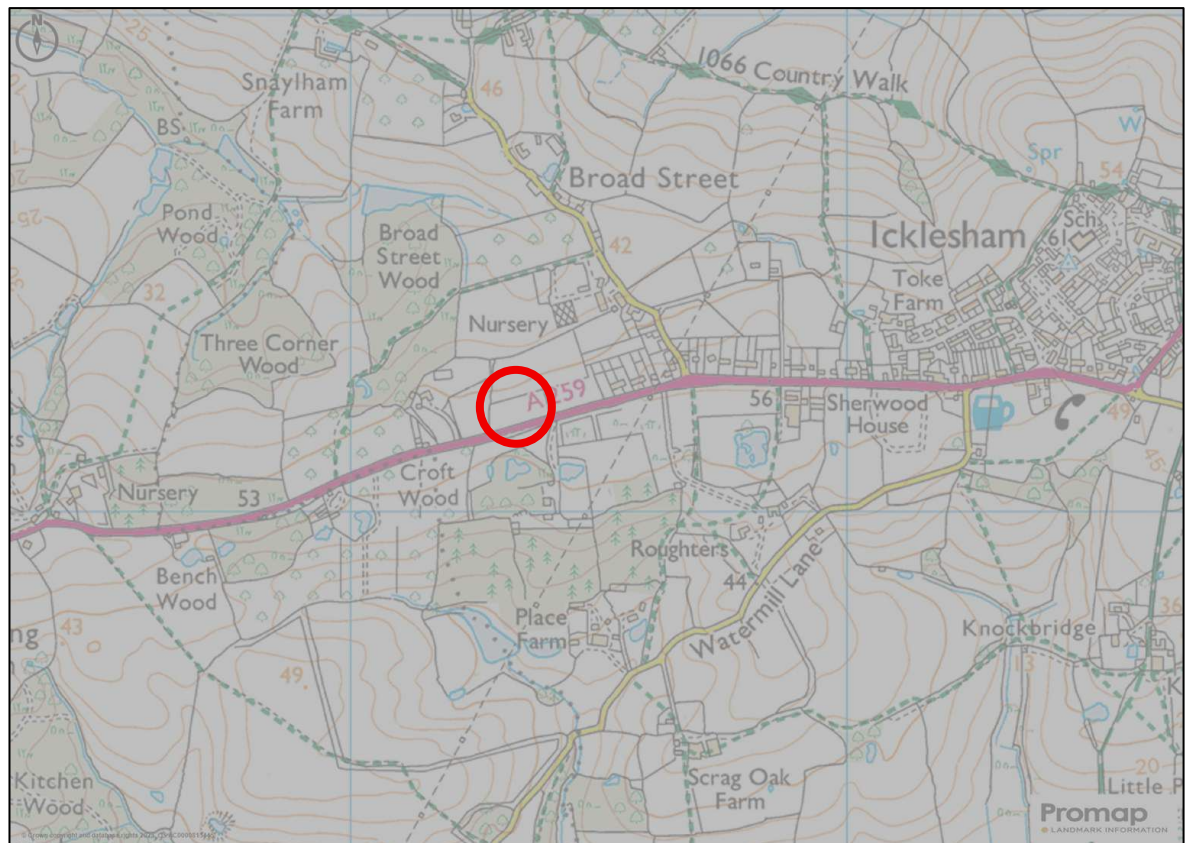


Figure 1.1 – Site Location Plan

- 1.3 National Highways (NH) has provided pre-application advice on the development proposals. The response includes advice that the applicant should "Demonstrate compliance with the Design Manual for Roads and Bridges (DMRB) requirements, including conducting a safety risk assessment".
- 1.4 This Safety Risk Assessment has been carried out in accordance with Section GG104 of the Design Manual for Roads and Bridges (DMRB), in order to address the NH request.

### **Description of the Proposed Scheme on the Strategic Road Network**

- 1.5 The proposed scheme consists of a new simple priority junction on Main Road, located approximately 120 metres to the west of Orchard Close, as shown on drawing 2501070-02. This shows that visibility splays of 2.4 by 160 metres can be achieved in both the eastern (trailing) and western (leading) directions.
- 1.6 The access geometry consists of a 5.5 metre wide access road with 9 metre kerb radii. The arrangement includes 2 metre wide footways on either side of the access, providing pedestrian links into the proposed development.
- 1.7 A radar speed survey was carried out from Monday 2<sup>nd</sup> June 2025 to Sunday 8<sup>th</sup> June 2025 to measure traffic speeds on the A259 Main Road at two locations near to the proposed development. Records indicate that the weather was dry during this period and the data obtained shows that the 85<sup>th</sup> percentile traffic speeds approaching from the western direction were 46.9mph and the 85<sup>th</sup> percentile traffic speeds approaching from the east were 44.4mph.
- 1.8 The remainder of this Safety Risk Assessment considers all of the possible risks associated with the activity that may pose a danger to the SRN and demonstrates how those risks would be mitigated, in accordance with the framework set out in GG104. The following sections cover the GG104 framework safety risk assessment planning process, consisting of:
  - ▶ Safety Risk Assessment Planning
  - ▶ Categorisation of activity type
  - ▶ Identification of affected populations
  - ▶ Safety risk assessment scope
  - ▶ Safety baseline and objective
- 1.9 The assessment continues with the safety risk assessment process, consisting of:
  - ▶ Hazard identification
  - ▶ Hazard analysis
  - ▶ Analysis of safety risk
  - ▶ Evaluation of safety risk
  - ▶ Safety risk treatments

## **2.0 Safety Risk Assessment Planning Process**

- 2.1 The following paragraphs follow the framework for safety risk assessment, as set out in figure E/A.1 at appendix E/A of section GG104.

### **Part 1 - Safety Risk Assessment Planning**

#### **Define the question**

- 2.2 GG104 states that a safety risk assessment shall start by clearly defining and recording the question(s) that it is seeking to address. Where there are a number of alternative approaches to undertaking an activity, each of these approaches, known as options, shall be the subject of a safety risk assessment.

- 2.3 Based on the details of the proposed scheme, the question to be addressed by this assessment is defined as:
- ▶ Does the proposed access on the A259 Main Road result in an increased safety risk to other users of the Strategic Road Network (SRN), and how can those risks be mitigated such that the SRN continues to operate within acceptable levels of safety?

#### ***Determine alternative options***

- 2.4 No alternative options are under consideration due to this being a third-party scheme for which consent is being sought.

### **Part 2 - Categorisation of activity type**

#### ***Review features and assign activity categories and Determine overall activity category***

- 2.5 GG104 states that the activity categorisation process shall be used to determine if a safety control review group (SCRG) is to be established, which is a group formed of competent representatives of relevant National Highways business areas. Activities categorised as type B or C require a SCRG to be established. This section of the SRA process is written on the basis that the activity in question is a National Highways promoted scheme, relating to changes to the National Highways infrastructure or procedures, and is being undertaken by National Highways representatives. However, in this instance, the scheme being assessed is a third party proposal that has not had any involvement from National Highways business areas; therefore it is considered that in this instance it is not feasible to establish a SCRG at this stage. It is possible that this may change at a later date, in the event that the scheme has progressed beyond the planning stage and this Safety Risk Assessment is being updated by personnel at National Highways during the post planning stage.
- 2.6 Notwithstanding the above the activity has been assessed against the criteria set out in tables E/2.7 and E/2.8.1 of GG104 and found to consist more than three type A features, and therefore has an overall activity type category of type A and therefore does not require a safety control review group to be established.

### **Part 3 - Identification of Affected Populations**

- 2.7 The affected populations have been assessed in accordance with table E/1.4 of GG104. Given that the question being addressed relates to the potential safety risk that the scheme may have on the strategic road network, anyone using this section of the SRN could potentially be affected. Therefore, SRN users could be affected.
- 2.8 Workers on the SRN may also be affected but this would be at times when they are using the SRN; it is not considered that SRN workers would be exposed to hazards that are different from those identified as affecting SRN users. GG104 describes 'other parties' as persons who could be affected by the SRN but who are neither using it, nor working on it. In this context, this population type is not applicable to the Safety Risk Assessment in this instance.

### **Part 4 – Safety Risk Assessment Scope**

- 2.9 The scope of the activity consists of providing a new access on the A259 Main Road in the form of a simple priority junction as described in the paragraphs above.
- 2.10 It is assumed that the proposed access will not be constructed until (i) appropriate planning approval has been given and (ii) an agreement has been entered between the applicant and National Highways regarding the necessary permissions to carry out works on the SRN; and that following approval, the scheme will be constructed in accordance with the corresponding approved plans and conditions.

## Part 5 - Safety Baseline and Safety Objective

- 2.11 Paragraph E/2.22 of GG104 states that the safety objectives for all populations shall always be to manage risk so far as is reasonably practical which is considered to be relevant in this instance. In addition, the Personal Injury Collision (PIC) data for this section of road in its current form, i.e. prior to the construction of the improved access will form an appropriate safety baseline as part of the assessment.
- 2.12 Personal Injury Collision (PIC) data has been obtained from Crashmap for the section of the A259 in the vicinity of the proposed access, covering the latest available 5-year period. This PIC data shows that there was one collision during the study period, as summarised below and in the location plan at Figure 2.1.



Figure 2.1 – PIC Study Area Location Plan

- 2.13 Summary of collision:
- ▶ Sunday 5<sup>th</sup> April 2020 at 08:13: A collision occurred during daylight dry conditions at a give-way junction on the A259 involving a car and a motorcycle. The car was recorded as being in the act of turning right and was impacted at the rear by the motorcycle, resulting in serious injuries to the motorcycle rider.
- 2.14 The PIC data shows that one collision occurred resulting serious injuries to one casualty during the study period. This indicates that there are no collision clusters or other collision patterns that would be indicative of existing road safety issues within the study area.
- 2.15 The safety objective will be met if (i) the risks have been managed so far as is reasonably practical, (ii) there are no PICs at this location that would otherwise not have occurred if the scheme were not constructed; and (iii) there are no instances of PICs occurring that would otherwise have had a less severe outcome, if the scheme were not implemented.

## 3.0 Safety Risk Assessment Process

### Part 6 – Hazard Identification

- 3.1 The foreseeable hazards associated with the activity have been identified and recorded in the hazard / risk matrix appended to this report. A summary is provided below:
- ▶ Hazard 1: Vehicles entering and leaving the proposed residential development may conflict with vehicles on the SRN due to provision of potentially inadequate visibility splays.
  - ▶ Hazard 2: Vehicles entering and leaving the proposed residential development may conflict with one another and with other vehicles on the SRN due to provision of potentially inadequate road markings and signage.
  - ▶ Hazard 3: Vehicles entering and leaving the proposed residential development may conflict with one another and with other vehicles on the SRN due to provision of potentially inadequate vehicle manoeuvring space.
  - ▶ Hazard 4: Pedestrians using the footway may be struck by vehicles entering and leaving the proposed residential development due to potentially inadequate provision of a pedestrian crossing point.
  - ▶ Hazard 5: Vehicles entering and leaving the proposed residential development may potentially conflict with vehicle movements at the existing layby.

### Hazard Analysis

- 3.2 Hazard analysis is provided below and recorded in the hazard / risk matrix appended to this report.
- 3.3 **Hazard 1:** Vehicles entering and leaving the proposed residential development may conflict with vehicles on the SRN due to provision of potentially inadequate visibility splays. Inadequate visibility would impact SRN users due to vehicles approaching the junction having insufficient distance to safely slow down or stop as necessary to avoid vehicle collisions.
- 3.4 **Hazard 2:** Vehicles entering and leaving the proposed residential development may conflict with one another and with other vehicles on the SRN due to provision of potentially inadequate road markings and signage. Inadequate road markings and signage may lead to poor road positioning within the junction or vehicles overshooting the junction when approaching from the minor road and colliding with one another within the junction, or vehicles braking sharply leading to nose to tail shunts on the A259. This would impact SRN users.
- 3.5 **Hazard 3:** Vehicles entering and leaving the proposed residential development may conflict with one another and with other vehicles on the SRN due to provision of potentially inadequate vehicle manoeuvring space within the junction bellmouth. Inadequate vehicle manoeuvring space may lead to vehicles mounting the footway causing a hazard to footway users, colliding with other vehicles within the junction, or braking sharply leading to nose to tail shunts on the A259. This would impact SRN users.
- 3.6 **Hazard 4:** Pedestrians using the footway may be struck by vehicles entering and leaving the proposed residential development due to potentially inadequate provision of a pedestrian crossing point. The lack of crossing point on the minor road may lead to pedestrians crossing at inappropriate locations or mobility impaired pedestrians having difficulty safely negotiating the kerbed bellmouth. This would impact SRN users.
- 3.7 **Hazard 5:** Vehicles entering and leaving the proposed residential development may potentially conflict with vehicle movements at the existing layby, due to proximity of the layby and associated vehicle movements at this location. The potential risk of vehicle conflict would impact SRN users.

### Analysis of Safety Risk and Safety Risk Treatments

3.8 An analysis of the safety risks for each hazard and each population potentially affected has been carried out and summarised in the hazard / risk table appended to this report. This includes an assessment of the likelihood of the risks being realised and the potential severity of the consequences.

**Hazard 1:** Vehicles entering and leaving the proposed residential development may conflict with vehicles on the SRN due to provision of inadequate visibility splays.

3.9 The provision of sufficient visibility splays are a key factor in the safe operation of priority junctions on the SRN. It is noted that the proposed junction is within a 40mph speed limit, but is approximately 80 metres from a change to the national speed limit (60mph for light cars and vans that are not towing a trailer). Therefore it is necessary to assess the achievable 2.4 by 160 metre visibility splays at the proposed access.

3.10 Section CD123 of the DMRB sets out the visibility requirements at priority junctions, and specifically paragraph 3.4 states that the Y distance requirements correspond to the desirable minimum stopping sight distance (SSD) for the speed of the major road, as set out in table 2.10 of section CD109. This table shows that the desirable minimum SSD corresponding to a 40mph speed limit (70kph design speed) is 120 metres, and the desirable minimum SSD corresponding to a 60mph speed limit (100kph design speed) is 215 metres. The proposed access is shown on drawing 2501070-02 as achieving SSDs of 160 metres, which corresponds with a speed limit of design speed of 85kph (50mph speed limit). These visibility splays may not be adequate in the event that vehicle speeds approaching from the national speed limit section of road are not sufficiently reduced from 60mph.

3.11 Paragraph 3.5 of CD123 states that where priority junctions do not form part of a through route on existing major roads, the speed of the major road that shall be used for determining point Y shall be based on the design speed or speed measurement. Therefore it is appropriate to base the Y distance requirements for the proposed access on the traffic speeds observed during the radar speed survey.

3.12 As noted in the introduction, a radar speed survey has been carried out showing that the 85<sup>th</sup> percentile traffic speeds approaching from the western direction were 46.9mph and the 85<sup>th</sup> percentile traffic speeds approaching from the east were 44.4mph. Using the standard SSD formula with the DMRB derived parameters of 2 seconds for driver perception / reaction time and 0.25g deceleration rate, these traffic speeds equate to the SSDs set out in table 3.1 below.

Traffic direction	85 <sup>th</sup> percentile speed	Corresponding SSD
Traffic approaching from the west	46.9mph	133.9 metres
Traffic approaching from the east	44.4mph	122.4 metres

Table 3.1 – Traffic speeds and corresponding stopping sight distances

3.13 Given that the observed 85<sup>th</sup> percentile traffic speeds were below 50mph, it is considered that the provision 160 metre visibility splays corresponding to a 50mph speed limit are sufficient at this location.

3.14 With regard to the X (set-back) distance, paragraph 3.8 of CD123 states that for simple junctions, the X distance should be 9 metres, but where this is not feasible the minimum distance should be as close to 9 metres as practicable, but no less than 2.4 metres.

- 3.15 It is understood that the minimum X distance of 2.4 metres is based on the typical bonnet length of a vehicle, and therefore ensures that any driver waiting to exit from a minor road has visibility along the full length of the SSD. It also ensures that a sufficient length of the nose of the waiting vehicle is visible to approaching drivers on the major road, such that they are aware of the vehicle waiting to exit and can respond accordingly in the event that the waiting driver decides to pull out of the minor road.
- 3.16 It is understood that larger X distances allow drivers on the minor road to assess the traffic on the major road, before they have reached the give way line, which is considered to primarily relate to the efficiency and capacity of a junction. Given that the proposed development consists of 26 dwellings, the number of anticipated vehicle movements at the junction will be relatively low and therefore an X distance of 2.4 metres is considered to be sufficient at this location.
- 3.17 Based on the above, the visibility splays at the proposed junction have been found to be adequate, therefore the likelihood of vehicle conflict occurring on the SRN due to inadequate visibility splays is recorded as "*Very unlikely; Highly improbable, not known to occur*". In the event that the SRN is impacted, the severity has been recorded as "*Serious harm; Serious injury or illness, Substantial damage or loss*". The corresponding risk value for this hazard is recorded as 3 (low), with the corresponding required action "Ensure assumed control measures are maintained and reviewed as necessary". On this basis further mitigation is not required in order to meet the safety objectives.
- 3.18 On the basis of the above risk value, further safety risk treatments are not required. However, it is recommended that the visibility splays are secured and maintained to ensure compliance with the requirements that "*control measures are maintained and reviewed as necessary*".

**Hazard 2:** Vehicles entering and leaving the proposed residential development may conflict with one another and with other vehicles on the SRN due to provision of potentially inadequate road markings and signage.

- 3.19 The arrangement shown on drawing 2501070-02 does not include any road markings or signage. This may result in vehicles overshooting the minor road into the path of vehicles on the major road, or vehicles failing to adopt appropriate road positioning when turning into or out of the access and colliding with one another within the junction, or braking sharply leading to nose to tail shunts on the A259.
- 3.20 The low volume of anticipated vehicle movements at the junction is a mitigating factor, combined with the fact that a significant proportion of those drivers using the access are likely to be familiar with the junction arrangement due to it being a small residential development. Therefore it is considered that the likelihood of vehicle conflict occurring on the SRN due to inadequate road markings and signage would be "*May happen; Once every 5-10 years*". In the event that it does occur, the severity is recorded as "*Serious harm; Serious injury or illness, Substantial damage or loss*" with a risk value of 9 (low), and a corresponding required action "Ensure assumed control measures are maintained and reviewed as necessary".
- 3.21 Whilst this outcome indicates that further mitigation is not required, it is recommended that further mitigation measures should be considered to reduce the risk value further, which could be in the form of (i) line markings to denote the edge of the major road and centre of the minor road, (ii) give way symbol marking and/or signage to warn drivers on the minor road that they are approaching a junction.
- 3.22 This mitigation would reduce the likelihood of the hazard occurring to "*Very unlikely; Highly improbable, not known to occur*". With the severity rating unchanged this would give a revised risk value of 3 (low), meeting the safety objective.

**Hazard 3:** Vehicles entering and leaving the proposed residential development may conflict with one another and with other vehicles on the SRN due to provision of potentially inadequate vehicle manoeuvring space.

- 3.23 Vehicle swept path analysis has not been carried out to demonstrate that the bellmouth geometry can accommodate two way vehicles movements. If adequate space is not provided for two way movements it may lead to vehicles colliding with one another within the junction, or braking sharply leading to nose to tail shunts on the A259.
- 3.24 As highlight above for hazard 2, the low volume of anticipated vehicle movements at the junction is a mitigating factor, combined with the fact that a significant proportion of those drivers using the access are likely to be familiar with the junction arrangement due to it being a small residential development.
- 3.25 On this basis it is considered that the likelihood of vehicle conflict occurring on the SRN due to inadequate vehicle manoeuvring space would be *"May happen; Once every 5-10 years"*. In the event that it does occur, the severity is recorded as "Serious harm; Serious injury or illness, Substantial damage or loss" with a risk value of 9 (low), and a corresponding required action "Ensure assumed control measures are maintained and reviewed as necessary". Whilst this outcome indicates that further mitigation is not required, it is recommended that vehicle swept path analysis is carried out and any adjustments to the geometry are implemented to ensure that two way vehicles movements can be accommodated.
- 3.26 This mitigation would reduce the likelihood of the hazard occurring to *"Very unlikely; Highly improbable, not known to occur"*. With the severity rating unchanged this would give a revised risk value of 3 (low), meeting the safety objective.

**Hazard 4:** Pedestrians using the footway may be struck by vehicles entering and leaving the proposed residential development due to potentially inadequate provision of a pedestrian crossing point.

- 3.27 The lack of crossing point with dropped kerbs and tactile paving on the minor road bellmouth may lead to pedestrians crossing at inappropriate locations or mobility impaired pedestrians having difficulty safely negotiating the kerbed bellmouth. As a result pedestrian may be at risk of being struck by vehicles, or suffering trip/falls.
- 3.28 Pedestrian flows are relatively light at this location and on this basis the likelihood of pedestrians being injured due to inadequate provision of a pedestrian crossing point would be *"May happen; Once every 5-10 years"*. In the event that it does occur, the severity is recorded as "Serious harm; Serious injury or illness, Substantial damage or loss" with a risk value of 9 (medium), and a corresponding required action "Ensure assumed control measures are maintained and reviewed as necessary". Whilst this outcome indicates that further mitigation is not required, the provision of a dropped kerb crossing point with tactile paving would reduce the likelihood and overall risk value further.
- 3.29 This mitigation would reduce the likelihood of the hazard occurring to *"Very unlikely; Highly improbable, not known to occur"*. With the severity rating unchanged this would give a revised risk value of 3 (low), meeting the safety objective.

**Hazard 5:** Vehicles entering and leaving the proposed residential development may potentially conflict with vehicle movements at the existing layby due to proximity of the layby and associated vehicle movements at this location.

- 3.30 The layby is located on the southern side of the road directly opposite the proposed access. It has an overall length of approximately 110 metres, and the entry / exit points are approximately 44 metres to the west and 48 metres to the east of the proposed access (measured centre to centre).
- 3.31 Reference has been made to section CD169 of the DMRB and it is noted that whilst paragraph 3.7 sets out the separation requirements between a layby and an at-grade junction or access (excluding field accesses) on the same side of the road, there is no separation requirement for laybys that are on the opposite side of the road to a junction. Therefore, further consideration has been given in the paragraphs below to the potential vehicle movements that are likely to occur at this location and how they will interact with the movements at the access.

- 3.32 It is considered that most vehicle movements are likely to be westbound vehicles entering at the eastern end of the layby and exiting at the western end to continue their journey. Use by vehicles travelling in an eastbound direction may also occur but will probably be less likely because drivers are required to cross the opposing traffic flow as they enter and exit the layby. Vehicles may also use the layby to perform a 'U' turn, which is also considered to be a less frequent manoeuvre but may still occur due to the lack of nearby roundabouts or other highway features facilitating a change in direction.
- 3.33 The majority of vehicle movements entering the layby will not pass the proposed access and are therefore unlikely to have any impact on its operation. Similarly the majority of vehicles exiting will be doing so at the western end of the layby to continue their westbound journey. However, some vehicle movements as described above may involve vehicles exiting the layby towards the access.
- 3.34 In this scenario, the drivers exiting the layby will be effectively waiting at a give way line as if exiting a minor road at a priority junction. Therefore the interaction between drivers exiting the layby and the proposed access could be considered to be similar a similar scenario that of a staggered junction arrangement.
- 3.35 Reference has been made to paragraph 2.24 of section CD123 of the DMRB, which states that the stagger distance shall be 50 metres for both right/left and left/right staggered junctions where there is no major road central treatment.
- 3.36 As noted above the layby entry / exit points are approximately 44 metres to the west and 48 metres to the east of the proposed access. Whilst these distance are below the 50 metre requirement for staggered junctions, it is considered that the low traffic volumes anticipated at the proposed access combined with the relative infrequency of 'U' turn manoeuvres likely to occur at the layby is a mitigating factor.
- 3.37 Given that the vehicle manoeuvres considered above will be commencing from a stationary (or near stationary) starting point at their respective give way lines, combined with the anticipated infrequency of these movements, the resulting likelihood of a hazard to road users being realised is low, and due to the relatively low speed of these movements, the severity would also be low.
- 3.38 On this basis the likelihood of conflict between vehicle movements at the existing layby and proposed access would be "*Very unlikely; Highly improbable, not known to occur*". In the event that it does occur, the severity is recorded as "Moderate harm; Slight injury or illness, Moderate damage or loss" with a risk value of 2 (low), and a corresponding required action "Ensure assumed control measures are maintained and reviewed as necessary".

## 4.0 Summary and Conclusion

- 4.1 Motion has been instructed to act on behalf of Chartwell Property Group with respect to a proposed residential development of 26 dwellings, which includes the provision of a new vehicular access on the A259 Main Road.
- 4.2 This Safety Risk Assessment has been carried out in accordance with Section GG104 of the Design Manual for Roads and Bridges (DMRB) and establishes that the safety objective will be met if (i) the risks have been managed so far as is reasonably practical, (ii) there are no PICs at this location that would otherwise not have occurred if the works were not constructed; and (iii) there are no instances of PICs occurring that would otherwise have had a less severe outcome, if the scheme were not implemented.
- 4.3 Five potential hazards associated with the proposed activity have been identified, which are:
- ▶ Hazard 1: Vehicles entering and leaving the proposed residential development may conflict with vehicles on the SRN due to provision of potentially inadequate visibility splays.
  - ▶ Hazard 2: Vehicles entering and leaving the proposed residential development may conflict with one another and with other vehicles on the SRN due to provision of potentially inadequate road markings and signage.
  - ▶ Hazard 3: Vehicles entering and leaving the proposed residential development may conflict with one another and with other vehicles on the SRN due to provision of potentially inadequate vehicle manoeuvring space.
  - ▶ Hazard 4: Pedestrians using the footway may be struck by vehicles entering and leaving the proposed residential development due to potentially inadequate provision of a pedestrian crossing point.
  - ▶ Hazard 5: Vehicles entering and leaving the proposed residential development may potentially conflict with vehicle movements at the existing layby.
- 4.4 These hazards have been analysed to establish the affected populations, the likelihood of occurrence and the potential severity. Where it is considered that the activity will result in an increase in the safety risk in comparison to the safety baseline, or where risk value can be improved, additional safety risk treatments have been recommended, which consist of:
- ▶ It is recommended that the 2.4 by 160 metre visibility splays are secured and maintained.
  - ▶ Line markings are provided to denote the edge of the major road and centre of the minor road; and give way symbol marking and/or signage are provided to warn drivers on the minor road that they are approaching a junction.
  - ▶ Vehicle swept path analysis is carried out and any adjustments to the geometry are implemented as necessary to ensure that two way vehicle movements can be accommodated.
  - ▶ A dropped kerb crossing point with tactile paving be provided at the bellmouth junction.
- 4.5 It is concluded that the safety objective of this Safety Risk Assessment will be met if the above recommendations are incorporated into the proposed scheme.

Hazard Identification / Analysis and Risk Analysis / Evaluation - Proposed Access on A259 Main Road, Icklesham

Hazard	Description	Consequences	Safety Risk Evaluation (Pre-mitigation)			Mitigation Measures	Safety Risk Evaluation (Post-mitigation)		
			Likelihood (L)	Severity (S)	Risk Value (L x S = R)		Likelihood (L)	Severity (S)	Risk Value (L x S = R)
1	Vehicles entering and leaving the proposed residential development may conflict with vehicles on the SRN due to provision of potentially inadequate visibility splays.	Inadequate visibility would impact SRN users due to vehicles approaching the junction having insufficient distance to safely slow down or stop as necessary to avoid vehicle collisions.	Very unlikely; Highly improbable, not known to occur (score 1)	Serious harm; Serious injury or illness, Substantial damage or loss (Score 3)	3 (low)	None proposed. However, visibility splays should be secured and maintained.	Very unlikely; Highly improbable, not known to occur (score 1)	Serious harm; Serious injury or illness, Substantial damage or loss (Score 3)	3 (low)
2	Vehicles entering and leaving the proposed residential development may conflict with one another and with other vehicles on the SRN due to provision of potentially inadequate road markings and signage.	Inadequate road markings and signage may lead to poor road positioning within the junction or vehicles overshooting the junction when approaching from the minor road and colliding with one another within the junction, or vehicles braking sharply leading to nose to tail shunts on the A259. This would impact SRN users.	May happen; Once every 5-10 years (Score 3)	Serious harm; Serious injury or illness, Substantial damage or loss (Score 3)	9 (low)	Provide (1) line markings to denote edge of major road and centre of minor road, (2) give way symbol marking and/or warning sign on minor road	Very unlikely; Highly improbable, not known to occur (score 1)	Serious harm; Serious injury or illness, Substantial damage or loss (Score 3)	3 (low)
3	Vehicles entering and leaving the proposed residential development may conflict with one another and with other vehicles on the SRN due to provision of potentially inadequate vehicle manoeuvring space within the junction bellmouth.	Inadequate vehicle manoeuvring space may lead to vehicles mounting the footway causing a hazard to footway users, colliding with other vehicles within the junction, or braking sharply leading to nose to tail shunts on the A259. This would impact SRN users.	May happen; Once every 5-10 years (Score 3)	Serious harm; Serious injury or illness, Substantial damage or loss (Score 3)	9 (low)	Carry out vehicle swept path analysis and adjustments bellmouth geometry if necessary for two way vehicles movements	Very unlikely; Highly improbable, not known to occur (score 1)	Serious harm; Serious injury or illness, Substantial damage or loss (Score 3)	3 (low)
4	Pedestrians using the footway may be struck by vehicles entering and leaving the proposed residential development due to potentially inadequate provision of a pedestrian crossing point.	The lack of crossing point on the minor road may lead to pedestrians crossing at inappropriate locations or mobility impaired pedestrians having difficulty safely negotiating the kerbed bellmouth. This would impact SRN users.	May happen; Once every 5-10 years (Score 3)	Serious harm; Serious injury or illness, Substantial damage or loss (Score 3)	9 (low)	Provide a dropped kerb crossing point with tactile paving	Very unlikely; Highly improbable, not known to occur (score 1)	Serious harm; Serious injury or illness, Substantial damage or loss (Score 3)	3 (low)
5	Vehicles entering and leaving the proposed residential development may potentially conflict with vehicle movements at the existing layby.	Due to proximity of the layby and associated vehicle movements at this location. The potential risk of vehicle conflict would impact SRN users.	Very unlikely; Highly improbable, not known to occur (score 1)	Moderate harm; Slight injury or illness, Moderate damage or loss (Score 2)	2 (low)	None proposed.	Very unlikely; Highly improbable, not known to occur (score 1)	Moderate harm; Slight injury or illness, Moderate damage or loss (Score 2)	2 (low)

Risk value (R)	Required Action
Low (1-9)	Ensure assumed control measures are maintained and reviewed as necessary.
Medium (10-19)	Additional control measures needed to reduce risk rating to a level which is equivalent to a test of SFAIRP for the population concerned.
High (20-25)	Hazard to be avoided or risk to be reduced to tolerable.

## **Appendix C**

Stage 1 Road Safety Audit

LAND NORTH OF THE A259 MAIN ROAD,  
ICKLESHAM

Proposed Access Junction Serving a Development of 26  
Dwellings

Stage 1 Road Safety Audit  
Overseeing Organisation: National Highways

November 2025



*Road Safety Engineering*

Project: Land North of the A259 Main Road, Icklesham  
Proposed Access Junction Serving a Development of 26 Dwellings

Document: Stage 1 Road Safety Audit

Design Organisation: Motion Consultants

Overseeing Organisation: National Highways

Client: Chartwell Land & New Homes Ltd

Gateway RSE ref: SG/WP/2506-23 RSA1 v1.0

Issue date: 18/11/2025

Status: Issued as v1.0

Authorised by: SG

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### **Road Safety Engineering**

*Cheyenne House  
West Street  
Farnham  
GU9 7EQ  
01483 679350  
admin@gateway-rse.co.uk  
www.gateway-rse.co.uk*

Gateway RSE Ltd is registered in England Number 14087123  
Registered Office: Cheyenne House, West Street, Farnham GU9 7EQ



## CONTENTS

1	Introduction .....	1
2	Problems Identified by this Road Safety Audit .....	3
3	Audit Team Statement .....	5

## Appendices

Appendix A:	Items Considered by this RSA
Appendix B:	Location Plan(s)

## 1 INTRODUCTION

1.1 This report results from a Stage 1 Road Safety Audit (RSA) carried out of highway proposals on the A259 Main Road at Icklesham in East Sussex.

1.2 This Road Safety Audit was carried out in November 2025 at the request of the Overseeing Organisation. The Road Safety Audit Team membership was approved by Bidur Rajbhandari of National Highways on 4<sup>th</sup> November 2025 as follows:

Steve Giles - Audit Team Leader  
BEng (Hons), IEng, FIHE, MCIHT, MICE, CMILT, MSoRSA, HE Cert Comp  
Gateway RSE

Wendy Palmer - Audit Team Member  
MCIHT, FIHE, MSoRSA, HE Cert Comp  
Gateway RSE

1.3 The highway works considered by this Audit comprise a new access junction to serve a development of 26 new dwellings.

1.4 The Road Safety Audit was carried out in accordance with the Road Safety Audit Brief, dated 23<sup>rd</sup> October 2025, approved by Darren Kirkman of the Overseeing Organisation on 30<sup>th</sup> October 2025 and accepted by the Audit Team Leader. The Audit Brief included the drawings, collision data and documents listed in Appendix A.

1.5 The Audit consisted of a desktop study and a site visit, which was carried out between 11:30 and 12:00 on Wednesday 12<sup>th</sup> November 2025, when the weather was fine and the road surface dry. Traffic flows were moderate, and no congestion was observed, whilst several pedestrians and one cyclist travelled along Main Road. The segregated layby opposite the proposed site access was closed temporarily by cones and signs.

1.6 The terms of reference for this RSA are as described in the Design Manual for Roads and Bridges (DMRB) document GG119. The Audit Team is independent of the project design team and has not been involved in the design process in any other capacity. The audit considers only the potential road safety implications of the scheme and has not verified compliance of the design with any other criteria.

- 1.7 The Audit Team is aware of the slight shortfall in the separation distances between the proposed site access and the layby entry/exit points, which the Overseeing Organisation considers a Departure from Standard (ref. DMRB / CD123). Whilst reference may be made to design standards, this report is not intended to provide a design check.
- 1.8 Recommendations are aimed at addressing the identified potential road safety problems. However, there may be other acceptable ways to overcome a problem, considering wider constraints and opportunities; the Auditors would be pleased to discuss such alternative solutions as appropriate. The recommendations contained herein do not absolve the Designers of their responsibilities.

#### **Previous Road Safety Audit(s)**

- 1.9 The Audit Team is not aware of any previous RSA having been undertaken of this scheme.

## 2 PROBLEMS IDENTIFIED BY THIS ROAD SAFETY AUDIT

### General Matters

- 2.1 The Audit Team raises no concerns in respect of general matters.

### Local Alignment

- 2.2 The Audit Team raises no concerns in respect of local alignment.

### Junctions

#### 2.3 Problem

Insufficient junction manoeuvring space may lead to collisions between vehicles or with other road users.

*Location: Site access junction*

No vehicle swept path drawings have been provided, and it is not clear that large vehicles would be able to complete turning manoeuvres without overrunning opposing traffic lanes or footways. This may lead to collisions between vehicles or with other road users.

#### Recommendation

Carry out vehicle swept path analysis and, if necessary, adjust the junction geometry.

### Walking, Cycling and Horse Riding

#### 2.4 Problem

Absence of pedestrian facilities may lead to trips/falls or collisions.

*Location: Site access junction*

No dropped kerbs or tactile paving are shown at the proposed site access junction. This could cause pedestrians, particularly those with mobility or vision impairments, to trip or fall within the carriageway and potentially be struck by a moving vehicle.

#### Recommendation

Provide dropped kerbs and tactile paving at the site access junction.

## Road Signs, Carriageway Markings and Lighting

### 2.5 Problem

Nighttime vehicle turning collisions due to absent or inadequate give way signs/markings.

*Location: Site access junction*

The Audit Team is concerned that, in the absence of street lighting, inadequate give way signage and road markings could lead to nighttime vehicle collisions at the junction.

### Recommendation

Provide suitable 'give way' signage and road markings at the site access junction, including a junction warning sign facing eastbound approaching drivers on Main Road (or relocate the existing sign). Also review the adequacy of the existing centre line road studs in Main Road and replace them if necessary.

### 3 AUDIT TEAM STATEMENT

3.1 We certify that this Road Safety Audit has been carried out in accordance with DMRB document GG119.

#### Audit Team Leader

Steve Giles  
BEng (Hons), IEng, FIHE, MCIHT, MICE, CMILT, MSoRSA, HE Cert Comp  
Senior Road Safety Engineer

Signed:

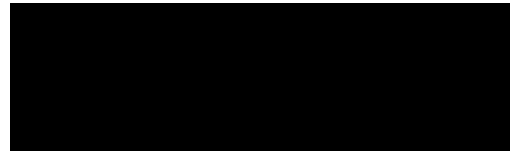


Date: 18/11/2025

#### Audit Team Member(s)

Wendy Palmer  
MCIHT, MSoRSA, FIHE, HE Cert Comp  
Senior Road Safety Engineer

Signed:



Date: 18/11/2025

## APPENDIX A

### Items Considered by this RSA

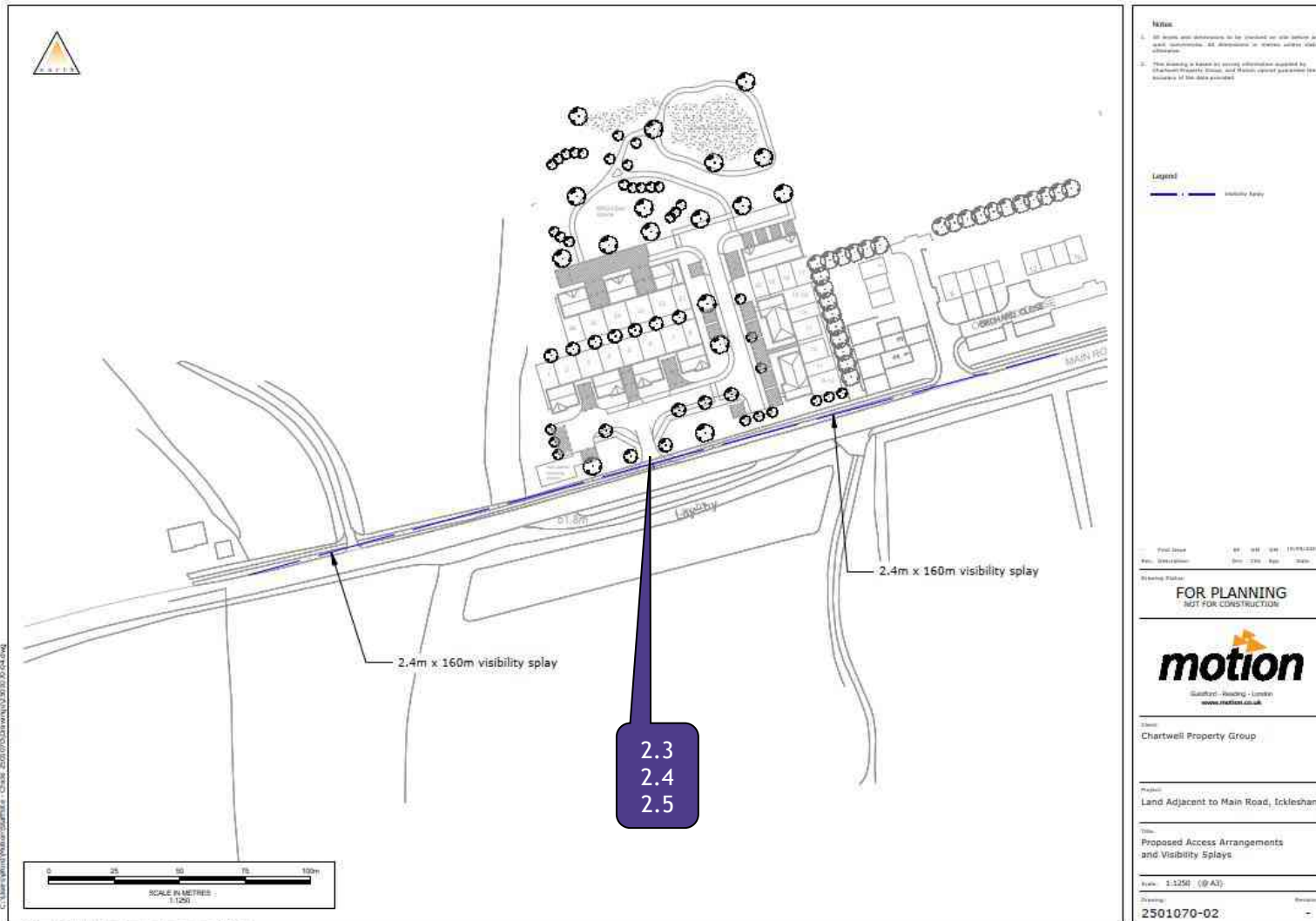
### Items Considered by this Road Safety Audit

Document ref.	Rev.	Originator	Title
2501070-02	-	Motion	Proposed Access Arrangements and Visibility Splay
2501070/chickl	-	Motion	Safety Risk Assessment
43379-001 & 2	-	Advanced Transport Research	7-day ATC, 2-8 June 2025 (two sites)

### Additional/background information provided to the Audit Team

- Stage 1 Road Safety Audit Brief dated 23/10/2025 (Motion ref 2501070)
- Indicative Site Masterplan 2 (addo)
- Highway Note dated 2/4/2025 (Motion)
- Advice Note 02 (JSJV)

## APPENDIX B Location Plan(s)



**Notes**

- All items and dimensions to be checked on site before any work commences. All dimensions in metres unless stated otherwise.
- This drawing is based on survey information supplied by [Chartwell Property Group] and [Motion] and is not a guarantee of the accuracy of the data provided.

**Legend**

- Visibility Splay

File Name: 2501070-02.dwg  
 Plot: 2501070-02.dwg  
 Date: 15/03/2023  
 User: [Name]  
 Plot: 2501070-02.dwg

Drawing Status:  
**FOR PLANNING**  
 NOT FOR CONSTRUCTION

Glastonbury - Reading - London  
 www.motion.co.uk

Client:  
 Chartwell Property Group

Project:  
 Land Adjacent to Main Road, Icklesham

Title:  
 Proposed Access Arrangements and Visibility Splays

Scale: 1:1250 (B/A1)  
 Drawing: 2501070-02

## **Appendix D**

Safety Audit Designer's Response

# Road Safety Audit Response Report


Site: Land North of the A259 Main Road, Icklesham  
Prepared by: DM  
Approved by: DM  
Date: 12 January 2026

**motion**  
84 North Street  
Guildford  
GU1 4AU  
Tel: 01483 531300  
www.motion.co.uk

## 1.0 Project Details

Project Details	
Report title	Stage 1 Road Safety Audit
Date	18 <sup>th</sup> November 2025
Document Reference and revision	SG/WP/2506-23 RSA1 v1.0
Prepared by	Gateway RSE
On behalf of	Motion

## 2.0 Authorisation Sheet

Authorisation Sheet	
Project	Land North of the A259 Main Road, Icklesham
Report title	RSA Designer's Response V2
Prepared/Approved by:	-
Name	David McMurtary
Position	Technical Director
Signed	
Organisation	Motion
Date	12 <sup>th</sup> January 2026

## 3.0 Introduction

- 3.1 Proposed Access Junction Serving a Development of 26 Dwellings.
- 3.2 Stage 1 RSA has been undertaken by Gateway RSE – reference SG/WP/2506-23 RSA1 v1.0.
- 3.3 Response report prepared by David McMurtary of Motion (details below).

## 4.0 Key Personnel

Key Personnel	
Overseeing Organisation	National Highways
RSA Team	Steve Giles, Gateway RSE
Design Organisation	David McMurtary, Motion

## 5.0 Design Organisation and Overseeing Organisation Statements

### Design Organisation Statement

5.1 On behalf of the design organisation I certify that:

- 1) the RSA actions identified in response to the road safety audit problems in this road safety audit have been discussed and agreed with the Overseeing Organisation.

▶ Name: David McMurtary



▶ Signed:

▶ Position: Technical Director

▶ Organisation: Motion

▶ Date: 12<sup>th</sup> January 2026

### Overseeing Organisation Statement

5.2 On behalf of the Overseeing Organisation I certify that:

- 1) the RSA actions identified in response to the road safety audit problems in this road safety audit have been discussed and agreed with the design organisation; and
- 2) the agreed RSA actions will be progressed.

▶ Name: Bidur Rajbhandari



▶ Signed:

▶ Position: Assistant Spatial Planner

▶ Organisation: National Highways

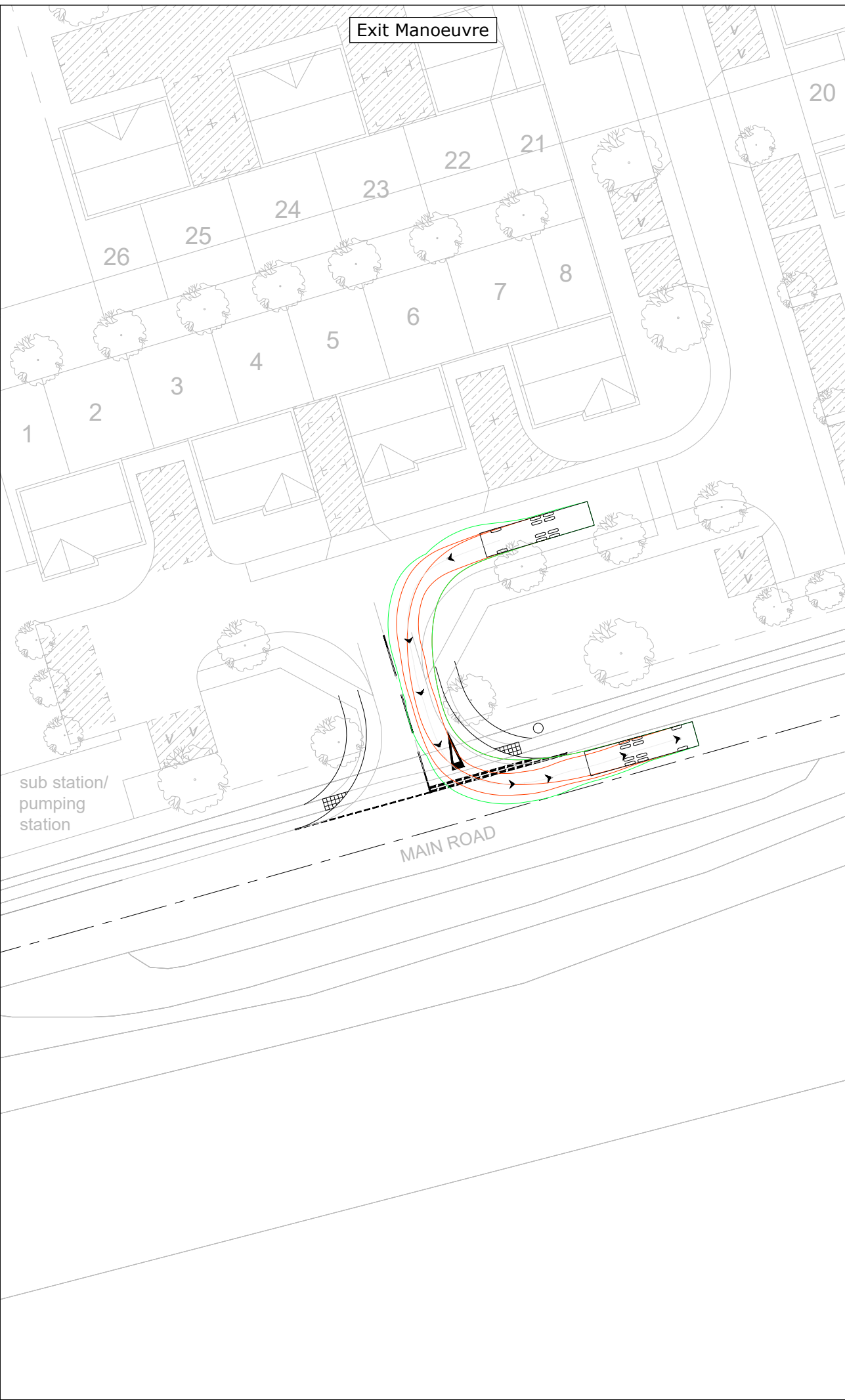
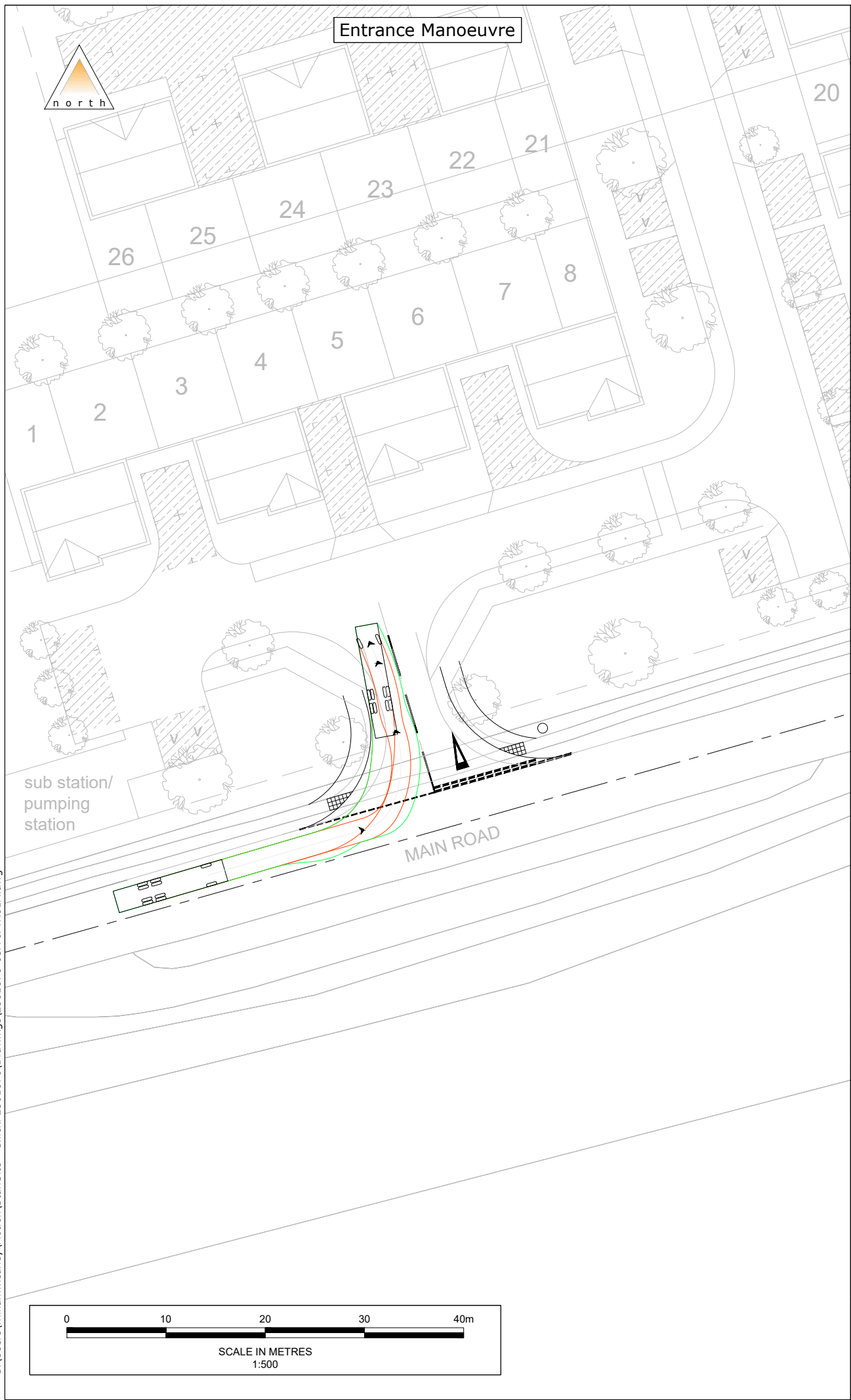
▶ Date: 16/01/2026

RSA Problem	RSA Recommendation	Design Organisation Response	Overseeing Organisation Response	Agreed RSA Action
<p>Insufficient junction manoeuvring space may lead to collisions between vehicles or with other road users.</p> <p>No vehicle swept path drawings have been provided, and it is not clear that large vehicles would be able to complete turning manoeuvres without overrunning opposing traffic lanes or footways. This may lead to collisions between vehicles or with other road users.</p>	<p>Carry out vehicle swept path analysis and, if necessary, adjust the junction geometry.</p>	<p>Swept path analysis of a refuse vehicle has been undertaken, and is shown on the drawing attached as <b>Appendix A</b>. This accounts for an 11.4 metre long refuse vehicle as required by Kent County Council. To achieve this the site layout has been amended to ensure vehicles do not overrun opposing traffic lanes.</p>	<p>Junction Design modified as identified in Stage 1 RSA by Gateway RSE and requested by NH on 16/12 reiterated on 24/12 correspondence to the designer</p>	<p>Junction Design to be carried forward as shown in drawing 2501070 – TK01 Rev A dated 06/01/2026 attached to this report in Appendix A</p>
<p>Absence of pedestrian facilities may lead to trips/falls or collisions.</p> <p>No dropped kerbs or tactile paving are shown at the proposed site access junction. This could cause pedestrians, particularly those with mobility or vision impairments, to trip or fall within the carriageway and potentially be struck by a moving vehicle.</p>	<p>Provide dropped kerbs and tactile paving at the site access junction.</p>	<p>This is acknowledged. The access junction design included as <b>Appendix B</b> illustrates tactile paving at the site access.</p>	<p>Junction Design modified as identified in Stage 1 RSA by Gateway RSE and requested by NH on 16/12</p>	<p>Junction Design to be carried forward as shown in drawing 2501070 -03 Rev A dated 06/01/2026 attached to this report in Appendix B</p>

<p>Nighttime vehicle turning collisions due to absent or inadequate give way signs/markings.</p> <p>The Audit Team is concerned that, in the absence of street lighting, inadequate give way signage and road markings could lead to nighttime vehicle collisions at the junction.</p>	<p>Provide suitable 'give way' signage and road markings at the site access junction, including a junction warning sign facing eastbound approaching drivers on Main Road (or relocate the existing sign). Also review the adequacy of the existing centre line road studs in Main Road and replace them if necessary.</p>	<p>This is acknowledged. The access junction design included as <b>Appendix B</b> illustrates the additional measures requested.</p>	<p>Junction Design modified as identified in Stage 1 RSA by Gateway RSE and requested by NH on 16/12</p>	<p>Junction Design to be carried forward as shown in drawing 2501070 -03 Rev A dated 06/01/2026 attached to this report in Appendix B</p>
--	--	--	--	---

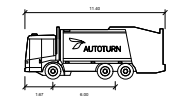
## **Appendix A**

### Swept Path Analysis



**Notes**

1. All levels and dimensions to be checked on site before any work commences. All dimensions in metres unless stated otherwise.
2. This drawing is based on survey information supplied by Chartwell Property Group, and Motion cannot guarantee the accuracy of the data provided.
5. Motion accepts no liability for any vehicle specification errors or inaccuracies within the vehicle tracking software used / or its vehicle libraries. The vehicles speeds used for the analysis are as follows: forward 6mph / reversing 6mph.



**KCC 11.4m Refuse Vehicle**

	metres
Width	2.25
Height	2.25
Wheelbase	4.5
Turning angle	58.8

A	Updated Arrangements	WMC	DM	DM	06/01/2026
-	First Issue	WMC	DM	DM	02/12/2025
Rev.	Description	Drm	Chk	App	Date

Drawing Status:

**FOR PLANNING**  
NOT FOR CONSTRUCTION



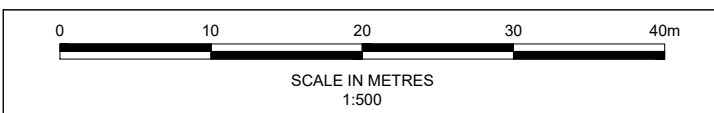
Client:  
Chartwell Property Group

Project:  
Land Adjacent to Main Road, Icklesham

Title:  
Swept Path Analysis  
KCC Refuse Vehicle

Scale: 1:500 (@ A3)

Drawing: 2501070-TK01 Revision: A



C:\Users\williammcaney\Motion\Staff\Site - Chickl 2501070\Drawings\2501070-03A & TK01A.dwg

## **Appendix B**

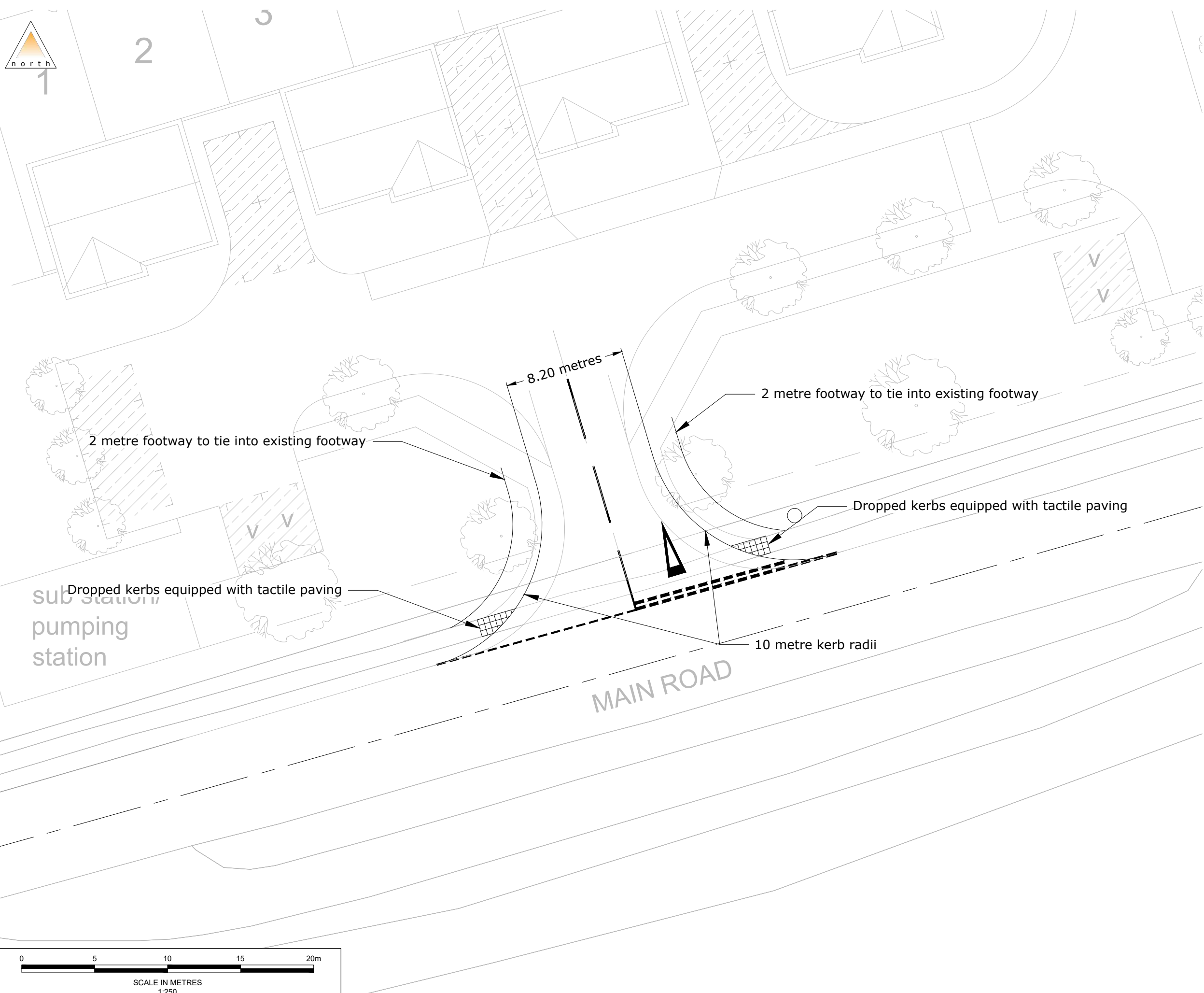
Revised Access Junction Design



2

3

1



Notes

1. All levels and dimensions to be checked on site before any work commences. All dimensions in metres unless stated otherwise.
2. This drawing is based on survey information supplied by Chartwell Property Group, and Motion cannot guarantee the accuracy of the data provided.

Rev.	Description	Dm	Chk	App	Date
A	Updated Arrangements	WMC	DM	DM	06/01/2026
-	First Issue	WMC	DM	DM	02/12/2025

Drawing Status:

**FOR PLANNING**  
NOT FOR CONSTRUCTION



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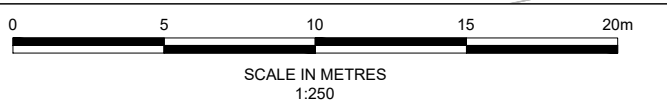
Client:  
Chartwell Property Group

Project:  
Land Adjacent to Main Road, Icklesham

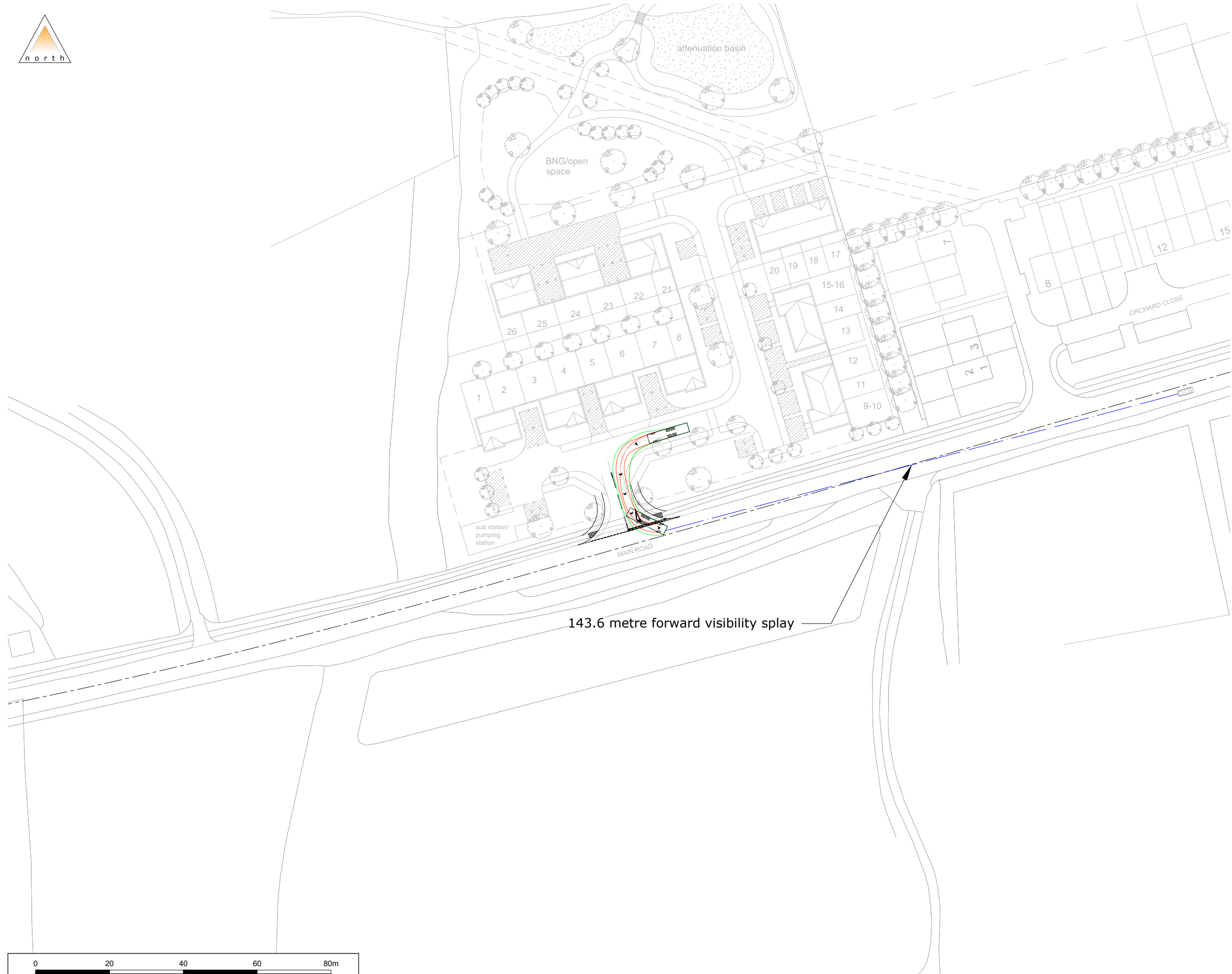
Title:  
Proposed Access Arrangements

Scale: 1:250 (@ A3)

Drawing: 2501070-03 Revision: A



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**Notes**

1. All levels and dimensions to be checked on site before any work commences. All dimensions in metres unless stated otherwise.
2. This drawing is based on survey information supplied by Chartwell Property Group, and Motion cannot guarantee the accuracy of the data provided.
3. Forward visibility splay Stopping Sight Distances (SSDs) determined through observed 85th percentile speeds derived from 7-day Automated Traffic Counters (ATCs). SSDs are as follows:

Westbound 85th percentile speed - 44.6 miles per hour

Rev.	Description	Dm	Chk	App	Date
A	Updated Arrangements	WMC	DM	DM	06/01/2026
-	First Issue	WMC	DM	DM	17/12/2025

Drawing Status:

**FOR PLANNING**  
NOT FOR CONSTRUCTION



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[www.motion.co.uk](http://www.motion.co.uk)

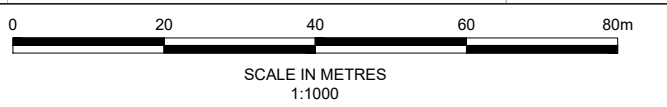
Client:  
Chartwell Property Group

Project:  
Land Adjacent to Main Road, Icklesham

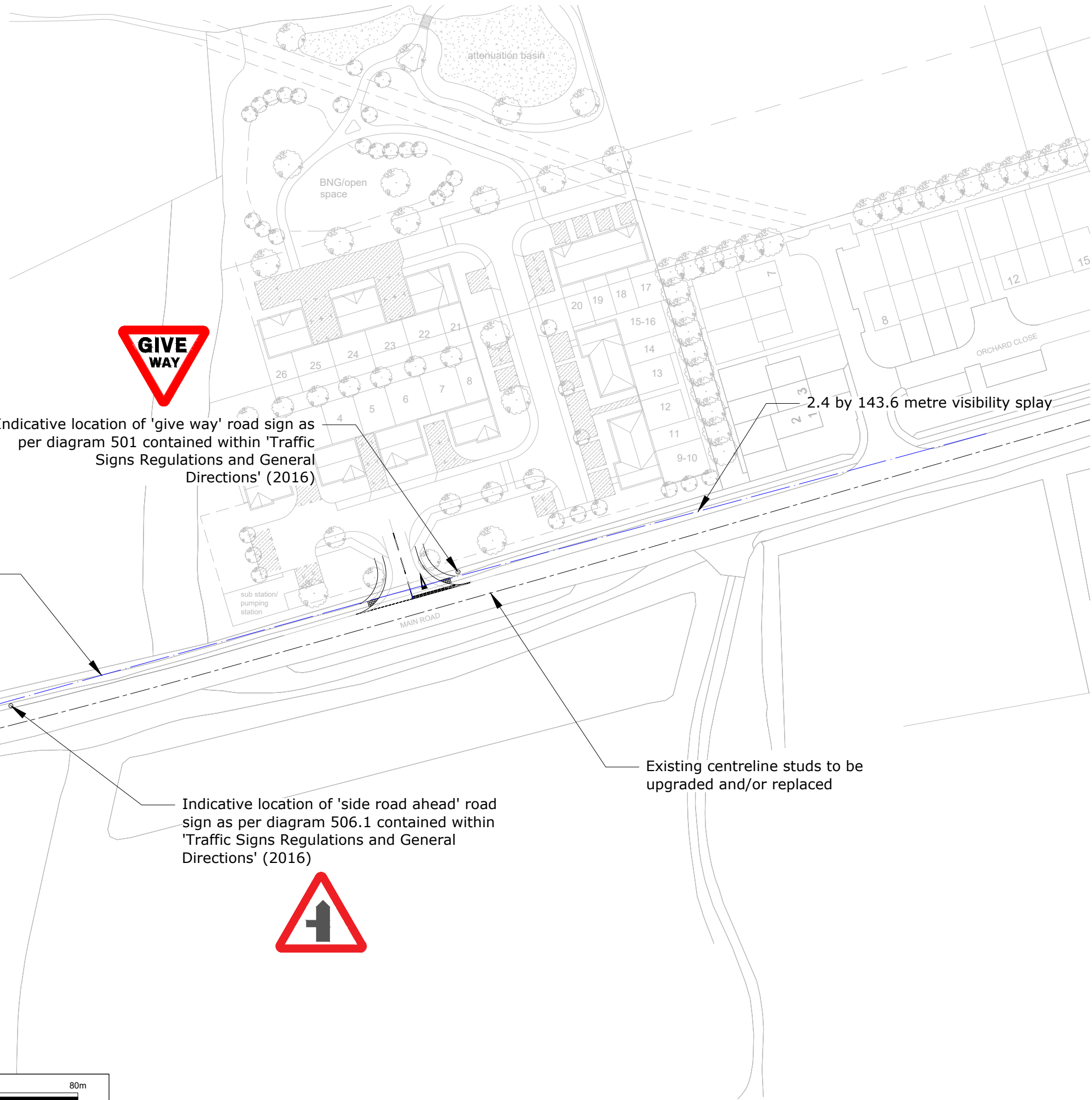
Title:  
Forward Visibility

Scale: 1:1000 (@ A3)

Drawing: 2501070-04 Revision: A



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Notes

1. All levels and dimensions to be checked on site before any work commences. All dimensions in metres unless stated otherwise.
2. This drawing is based on survey information supplied by Chartwell Property Group, and Motion cannot guarantee the accuracy of the data provided.
3. Road signs have been designed having regard to relevant design guidance contained within 'Traffic Signs Regulations and General Directions' (2016)
4. Visibility splay Stopping Sight Distances (SSDs) determined through observed 85th percentile speeds derived from 7-day Automated Traffic Counters (ATCs). SSDs are as follows:  
 Eastbound 85th percentile speed - 46.5 miles per hour  
 Westbound 85th percentile speed - 44.6 miles per hour

Rev.	Description	Drm	Chk	App	Date
B	Updated Arrangements	WMC	DM	DM	06/01/2026
A	Updated Arrangements	WMC	DM	DM	17/12/2025
-	First Issue	EF	DM	DM	19/09/2025

Drawing Status:  
**FOR PLANNING**  
 NOT FOR CONSTRUCTION



Client:  
 Chartwell Property Group

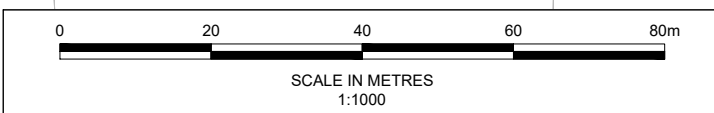
Project:  
 Land Adjacent to Main Road, Icklesham

Title:  
 Proposed Access Arrangements

Scale: 1:1000 (@ A3)

Drawing: 2501070-02 Revision: B

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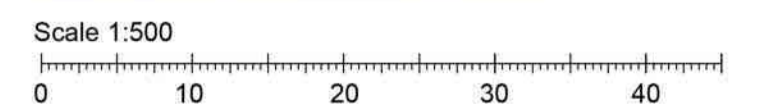
Land adjacent to Orchard Close, Icklesham

## Appendix 3 – Illustrative Masterplan

**CHARTWELL**  
UNLOCKING LAND | BUILDING BEAUTIFUL HOMES



Proposed Residential Development at Land North and West of Orchard Close, Icklesham



Report all discrepancies, errors and omissions. Verify all dimensions on site before commencing any work on site or preparing shop drawings.  
 All materials, components and workmanship are to comply with the relevant British Standards, Codes of Practice, and appropriate manufacturers recommendations that from time to time shall apply.  
 For all specialist work, see relevant drawings. This drawing and design are copyright of Clague LLP. Registration number: OC335648.  
 62 Burgate - Canterbury - Kent - CT1 2BH  
 2 Kingsbourne Court - Luton Road - Harpenden - Hertfordshire - AL5 3BL  
 8 Disney Street - London - SE1 1JF  
 Do Not Scale. Scaling permitted for planning purposes only.

No.	Date	Rev. by	Description
PD1	2026.02.04	ND	First Issue
PD2	2026.02.24	AS	Client Feedback
PD3	2026.03.10	YB	Minor Amendments
PD4	2026.03.10	YB	Minor Amendments
PD5	2026.03.13	YB	Minor Amendments
PD6	2026.03.16	YB	Minor Amendments

CLAGUE ARCHITECTS  
 www.clague.co.uk 01227 762 980 info@clague.co.uk

Client  
 Chartwell  
 Project Title  
 Land North and West of Orchard Close, Icklesham

Drawing Description  
 Proposed Residential Development  
 Proposed Site Layout Plan

Scale  
 1:500 @ A1  
 Date  
 February 2026  
 Created  
 ND  
 Checked  
 CSS

Drawing Status  
**PRELIMINARY**  
 Project - Originator - Function - Spatial - Form - Discipline - Number - Revision  
 31498A-CLA-PLSL-XX00-PD-A-0001 P06



Land adjacent to Orchard Close, Icklesham

## Appendix 4 – Pre-application Minutes

**CHARTWELL**  
UNLOCKING LAND | BUILDING BEAUTIFUL HOMES

# Meeting Minutes

***PPA meeting between Chartwell Land and New Homes 2 Ltd  
and Rother DC in relation to two pieces of Land at Main Road, Icklesham.  
PPA Agreement: PE/00054/2025***

**Location:** Rother Council Offices, Town Hall, London Road, Bexhill on Sea, TN39 3JX

**Time:** 13:30 hours

## **Attendees:**

**Chartwell:** Rob Anderson (RA) – Managing Director  
Martyn Avery (MA) – Land Director  
Andrew Black (AB) – Andrew Black Consulting

**Rother DC:** Edwin Corke (EC)  
Holly Harrison (HH)  
David Chambers (DC)  
Graeme Quinnell (GQ)  
Ruben Hayward (RH) – by Teams

-----  
Introductions were made by each member attending.

## **Icklesham North of Main Road**

### ***Local Plan update:***

**AB** asked where Rother were on their timings of the Local Plan and how receptive Rother would be to an early application pre Local Plan adoption.

**HH** stated that the latest Local Development Scheme for the new Local Plan has just been published and shows a target submission date of December 2026. There is a potential to follow up with a second Regulation 18 in January 2026 which will include site allocations. New target was increasing to 930 dwellings per annum.

**HH** confirmed that we are welcome to submit an application at any time but it could have more chance of success if application waited for Local Plan to advance more i.e. if the site became a draft allocated site (although there is no guarantee of this, as work on identifying allocated sites is continuing).

**AB** highlighted the proposed housing number for Icklesham in the draft Local Plan was 15 units. **HH** confirmed the numbers within the draft Local Plan are informed by the draft HELAA, and comprise sites known to be available at that time so door not closed on exact numbers for the area.

**MA** confirmed that the land was purchased by Chartwell circa 3 months ago so the site was fully available and deliverable.

**AB** confirmed that the site could come forward by the Autumn / Winter 2025 following surveys that were currently underway.

***Principle of development:***

**EC** highlighted that the Council cannot demonstrate a 5-year supply of deliverable housing sites and as such paragraph 11d) of the National Planning Policy Framework would be applicable when determining any application for a residential development. The site is in the High Weald National Landscape and the Council would need to be satisfied that the impact of a housing development on this protected area would not provide a strong reason for refusing the development.

**EC** advised that the site is located at the western end of the village, which is characterised by linear ribbon development and borders open countryside to the north. Residential development across the full extent of parcels 1, 2 & 3 would not be in keeping with the existing linear ribbon development and would not be supported. However, there is potentially scope for a residential development extending up to the line of the rear garden boundaries of the dwellings to the east which front Main Road e.g. Hillington Cottage, as this could be considered a natural extension to the village. The remaining land beyond this would then provide a landscape buffer to the countryside to the north.

**EC** advised that a view would need to be taken as to whether this would be a 'major development' for the purposes of paragraph 190 of the National Planning Policy Framework.

**DC** envisaged the houses built in the rear would face outwards towards the views to the rear.

**EC** confirmed that initial feedback received from the Landscape Advisor from East Sussex County Council was that much of the site is visible in views from the north and that any development should be concentrated on the front part of the site with an appropriate landscape buffer to the north.

Preference was for the northern section of the site to be kept open and green as a landscape buffer.

**RA** wanted to understand if there is potential for the rear land to still be used for attenuation basins and BNG etc which was confirmed as acceptable. Play space was also considered a possibility if more of a LAP rather than LEAP as suggested by **GQ**. The landscape impact of this would need to be carefully considered if provided in the landscape buffer.

Chartwell agreed that any new layout would look to take on board the above feedback.

***Access / Highways:***

Chartwell were encouraged to explore sharing current access of Orchard Close which Rother felt was over engineered at the time. **MA** questioned whether it was wide enough for two vehicles to park plus focus on pedestrians. **DC** commented that Rother supported shared surfaces, instead of pavements, in some situations. For further guidance see the High Weald Housing Design Guide.

**MA** confirmed that it was extremely unlikely that this will be a possible access for a number of reasons including two, possibly three third party ownerships, not sure if it was legally possible and thirdly the sewage infrastructure connects into Orchard Close at this point and likely to be infrastructure under this point of site to support the connection.

**RA** commented that, it may not even be commercially viable to bring two other parties.

**GQ** said that he would assist in an introduction to Community Land Trust. **MA** to reach out to them in the near future.

It was unknown who actually owned the road and whether the shared access was even legally possible. **GQ** felt that the Trust may actually own the road and that Hastoe Housing Association had a lease over it.

**MA** highlighted that the landowner of parcels 3 and 4 was elderly and therefore his family do not want him tied into a contract so Chartwell could not guarantee that the land could even be brought forward that linked our land with the Orchard Close development. The original Reg 18 orange zoning does not show a link of the two sites as shown side by side so was highways previously considered.

**DC** said that he did not see parcel 4 adding any real value to the site apart from BNG area but **MA** confirmed that BNG would probably now be achieved in the northern part of the site. **EC** asked whether Chartwell looking to secure BNG on site which was confirmed as the intention.

**AB** confirmed that there is a culverted surface water pipe that discharged to a pond in the northwest which was located right at the point of access into the rear land.

**MA** confirmed that the development at Orchard Close was set at a higher level than the land behind and there was a bund / landscape buffer that surrounded the site.

**EC** agreed that it will be for Chartwell to prove they have explored this route before considering the new access. The creation of a new access would result in an additional impact on the High Weald National Landscape, which would need to be considered.

A secondary access would require engagement with National Highways as Main Road is a trunk road. **HH** advised Chartwell to consider the High Weald Housing Design Guide.

**MA** confirmed that the highways report that had been submitted as part of the application confirmed that the access was possible in highways grounds in terms of visibility splays and the removal of a very small part of the hedge was necessary i.e. not an over engineered access like Orchard Close.

**EC** encouraged Chartwell to engage with National Highways and East Sussex CC as a pre application.

**EC** also went to say that Chartwell should seek to engage with LLFA and East Sussex CC on Suds.

### **Architecture:**

**DC** indicated that the preference in the High Weald Housing Design Guide was for more terrace houses accompanied by smaller number of semis and detached homes.

**HH or DC** confirmed that if a site was to be released for housing, then the site would need to be designed efficiently. We would support an increase in the density of housing provided that it was appropriate, and it was of high quality design.

**DC** preference was for contemporary vernacular architecture, fully informed by the requirements of the High Weald Housing Design Guide and submitted with a design and access statement that communicates how these design requirements have been addressed. **RA** confirmed that Chartwell's architect lived in Ridgewood near Uckfield and knew the area well and would design something suitable. **DC** referred Chartwell to architecture proposed on recent consent at Conkers in Iden as this was nicely designed.

**DC** encouraged D&A to cover a number of items included within Part 2 – impact on natural landscape, visual intrusion, archeology etc.

Ensure the application meets the usual space standards, M4(2), **GQ** indicated that at least one M4(3) unit would be welcomed but probably not essential unless a specific need was identified on the Rother Housing register, in line with Policy DHG4 of the Rother Development and Site Allocations Local Plan.

### ***Recent consents and refusals:***

**EC** highlighted a recent Appeal refusal at The Old Manor House in Broad Oak which he was going to circulate (now received).

**EC** was also going to issue a number of recent consents locally (email with application references been sent).

### ***Housing Associations:***

**MA** confirmed that an approach had been made to five providers to date. None were able to commit at this stage until their future funding is known. Initial feedback from some parties was that the scheme was too small for them to be interested. **GQ** confirmed he would assist at the appropriate time. **GQ** also advised early consideration of providing additional affordable housing above policy compliance levels as this would be more likely to see RP interest in acquiring the planning obligation homes. **GQ** confirmed that we don't have to have an end user in place at the point of submission as the S106 will cover off the agreed tenures etc.

Chartwell confirmed the intention was to provide policy compliant affordable units on site but this will obviously be down to HA funding available. **RA** commented on a very good product recently rolled out on a current Chartwell site called Discount Market Sale and wondered whether this tenure (which is recognised in the NPPF) could be considered. **GQ** confirmed that this would not be a policy compliant model of affordable housing and affordable/social rent homes should be provided together with shared ownership.

### ***Self-Build / Custom Build:***

**HH** said that to the policy requirement is to have 5-10% of the units as custom or self builds units (Policy DHG6 of the Rother Development and Site Allocations Local Plan). Chartwell quickly highlighted that in their very recent experience the reality of buyers being able to financially afford this route, given the mortgage rate levels for this product, was difficult to achieve in reality. **MA** questioned whether Rother could highlight an example of any homes that had been built out as a self-build / custom build. **EC** could not name one but did mention there was a recent consent which included this tenure but it hadn't progressed sufficiently enough to know if they were able to achieve this on site. It was acknowledged that the majority of people on Rother's self-build list envisage a self-build as a single plot, not a small house set within a housing estate.

Chartwell would continue to look at providing this tenure but wanted the issues experienced highlighted at an early stage.

**Additional items:**

***Sustainability:***

**HH** commented that we would have to ensure we demonstrate that the site is sustainable in terms of bus stops, access to schools and other services and facilities, etc.

***Play space / provision of greenspace:***

It was discussed how it would be welcome as the local play area is the other end of Icklesham. Chartwell to consider a LAP as part of their future layout for Rother to consider.

**EC** encouraged the submission of an EIA Screening Opinion Request prior to formal application.

## **Icklesham South of Main Road**

**MA** presented indicative scheme on the western side of ICK 0042 given the land adjacent (ICK 0017) received an initial positive response. **MA** asked if the land at ICK0017 had been made available which **HH** confirmed wasn't the case and that it was a site that Rother deemed as having potential. **HH** said that this site may not actually make the final draft of the plan.

**HH** pointed out that the site ICK0017 had a more defensible boundary when viewed from the south compared to the slightly more open site being discussed.

**MA** enquired whether a liner development fronting Main Road would be considered more favourable but **EC** felt that it would still potentially fall foul of the landscape views from the south and therefore not accepted.

**MA** enquired whether the land as 100% affordable or supported by the Land Community Trust would make a difference which again the landscape impact was highlighted as the initial concern.

Chartwell acknowledged the response and thanked Rother for their time and said that they will be back in touch following a debrief with a view of continuing a follow up pre application meeting on the northern land once the items raised had been taken into consideration.

**Meeting ended.**



Land adjacent to Orchard Close, Icklesham

## Appendix 5 – Secretary of State Letters to Three Rivers Council and Hastings Council

**CHARTWELL**  
UNLOCKING LAND | BUILDING BEAUTIFUL HOMES



Ministry of Housing,  
Communities &  
Local Government

**Matthew Pennycook MP**  
*Minister of State for Housing and  
Planning*

**Ministry of Housing,  
Communities &  
Local Government**  
4th Floor, Fry Building  
2 Marsham Street  
London SW1P 4DF

Cllr Stephen Giles-Medhurst OBE  
Leader of Three Rivers District Council  
Three Rivers House  
Northway  
Rickmansworth  
WD3 1RL

**By email only**

5 February 2026

Dear Cllr Giles-Medhurst,

I am writing to you in advance of the commencement of the Three Rivers local plan Regulation 19 consultation scheduled for 6 February.

As I set out in my letter to you of 14 November, I expect Three Rivers to bring forward a plan that meets identified need as far as possible; that reflects national policy, including in relation to Green Belt release; and that is capable of being found sound at examination.

As it stands, your emerging plan proposes to meet only 56 per cent of the local housing needs identified by the standard method, leaving a shortfall of over 5,000 dwellings, with little explanation publicly available to justify this approach.

Section 20 of the Planning and Compulsory Purchase Act 2004 (the 2004 Act) requires local planning authorities to only submit a plan when they think it is ready for an independent examination. Your own committee report highlights a high risk that the plan may fail at examination due to the scale of the shortfall in meeting housing need. As a result, I have little confidence that your emerging plan is satisfactory and capable of being found sound or legally compliant at examination.

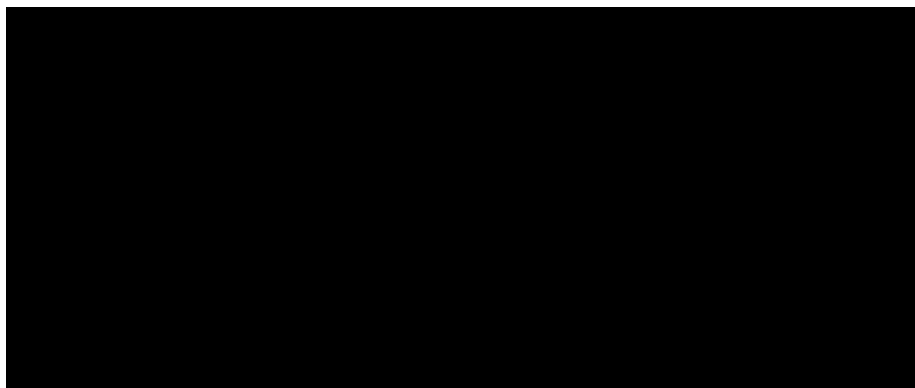
**In light of this I have decided to exercise the Secretary of State's powers under section 21A of the Planning and Compulsory Purchase Act 2004 (the 2004 Act) (inserted by section 145(5) of the Housing and Planning Act 2016), to direct Three Rivers not to take any step in connection with the adoption of the Plan, while I consider whether to give a direction in relation to the Plan under section 21 of the 2004 Act. This direction will remain in force until I withdraw it or give a direction under section 21 of the 2004 Act in relation to the Plan. I will also be considering directions under section 27 of the 2004 Act should this be necessary to drive the delivery of a sound plan.**

To support me in deciding whether to withdraw the holding direction or take further action, I request that you provide me with the full documentation you intend to publish for the Regulation 19 consultation. This should include, but not be limited to, the evidence base listed in paragraph

1.9 of your draft Regulation 19 Part 1 document. I would be grateful if you could provide this documentation by 19 February 2026.

I hope that you will engage constructively with my officials who will be in touch with your officers to take this work forward.

Yours sincerely,



**MATTHEW PENNYCOOK MP**  
Minister of State for Housing and Planning



Ministry of Housing,  
Communities &  
Local Government

**Matthew Pennycook MP**

*Minister of State for Housing and Planning*  
2 Marsham Street  
London  
SW1P 4DF

Cllr Stephen Giles-Medhurst OBE  
Leader, Three Rivers District Council  
Three Rivers House  
Northway  
Rickmansworth  
WD3 1RL

18 March 2026

Dear Cllr Giles-Medhurst,

Thank you for providing me with the full body of evidence that underpins the Three Rivers draft plan. Having considered it carefully, I am writing to inform you that the Secretary of State is now directing the Three Rivers District Council ('the Council') in respect to its emerging local plan ('the plan').

In my letter to you of 14 November 2025, I made clear that I expect Three Rivers to bring forward a plan that meets identified need as far as possible; that reflects national policy, including in relation to Green Belt release; and that is capable of being found sound at examination.

In my subsequent letter of 5 February 2026, I reiterated my concern that your emerging plan was not satisfactory and my lack of confidence that it was capable of being found sound or legally compliant at examination. In that same letter, I notified you that as a result of my reservations, I was exercising my powers under section 21A of the Planning and Compulsory Purchase Act 2004 ('the 2004 Act'), to direct the Council not to take any step in connection with the adoption of the Plan, while I considered whether to give directions under section 21 and section 27 of the 2004 Act.

Having reviewed the draft plan alongside the additional evidence you provided, it is my considered opinion that the Regulation 19 draft plan approved for consultation at the Full Council vote on 27 January has not engaged sufficiently with the concerns I have conveyed to you.

As you will know, Section 21 of the 2004 Act provides the Secretary of State with intervention powers where they think that a local plan is unsatisfactory. Section 27 of that same Act provides the Secretary of State with broad default intervention powers where they believe a local planning authority is failing or omitting to do anything that it is necessary for them to do in connection with the preparation, revision or adoption of its Local Plan.

Local planning authorities are required to publish and maintain a Local Development Scheme (LDS), as set out in section 15(1) of the 2004 Act. Section 15(4) of the 2004 Act provides that the Secretary of State may direct changes to a local development scheme where they consider that

amendments are necessary to ensure that the authority's development plan documents fully and effectively cover the whole area.

It is my firm view that the available evidence demonstrates that the Council's Regulation 19 draft plan fails to propose allocating all appropriate housing sites available that could contribute towards meeting housing need. The Council are therefore proposing a plan which is highly likely to be found unsound at examination. On this basis, it is clear that the plan is unsatisfactory and that the Council is failing to do something necessary in respect of preparing the local plan. This meets the statutory test for intervention under section 21 and 27 of the 2004 Act

I have also considered the criteria laid out in the Planning Practice Guidance (PPG), which states that intervention under S27 of the 2004 Act "*should have regard to plan progress and local development needs*":

- **Plan Progress:** The current Three Rivers Local Plan, adopted in October 2011, is now almost 15 years old. It therefore stands as one of the oldest in the country and the policies it contains are likely to be significantly out of date. Progressing an unsatisfactory plan risks failure at examination and long delays until an up-to-date adopted plan is in place, with work having to restart in the new planning system. This would continue to leave the Council vulnerable to piecemeal and speculative development, with reduced public engagement and fewer guarantees that it will make the most of the area's potential.
- **Development needs:** The Council has consistently delivered below the target set by the standard method. The latest Housing Delivery Test (HDT) 2023 is the 5th lowest in the Country with a score of 30%, putting the LPA in the presumption in favour of sustainable development. This is unlikely to change without the adoption of an up-to-date Local Plan. The Council area is also one of the least affordable in the country, with an affordability ratio of 12.3 - meaning the median house price is 12.3 times the median annual earnings - compared with the England average of 7.7. There continues to be a significant need for additional social and affordable housing delivery in the area, which is unlikely to be met whilst the Council does not have an up to date local plan.

Taking all of the above into account, I consider that the intervention criteria are met, and that intervention is justified.

Pursuant to the powers in section 21 (1)(a) of the 2004 Act I am directing the Council to:

**1. Per Section 21(1)(a): make modifications to your proposed Regulation 19 plan to include, as a minimum, the sites set out below lifting the requirement to approximately 85% of need:**

- CFS26a Kings Langley Estate south
- CFS21 Land at Rousebarn Lane
- PCS4 East Green Street
- PCS47 South of Little Oxhey Lane
- NCFS12 Land East of Oxhey Lane
- NCFS6 Land to East of Watford Road
- Additionally, OSPF22 Batchworth Golf Course should lease issues be resolved

- 2. Per Section 21(1)(a): review and update the draft plan and evidence base in readiness for Regulation 19 consultation and Submission including where necessary in order to account for the additional sites.**

I previously gave a direction to the Council under section 21A of the 2004 Act, whilst I considered whether to make a direction under section 21 of the 2004 Act. The above direction under section 21(1)(a) supersedes the previous direction given under section 21A.

In addition, per section 27 of the 2004 Act I am directing the Council as follows:

- 3. Per Section 27(2)(b): Commence a revised Regulation 19 consultation by 31 July 2026 for a minimum period of 6 weeks;**
- 4. Per Section 27(3)(b): Submit your plan by 30 November 2026 with any proposed minor modifications necessary agreed by the Head of Planning Policy and the Director of Finance in consultation with the Lead Member on the Local Plan. Should proposed modifications be more significant this should be set out to the Secretary of State, allowing him to consider whether further action is necessary;**
- 5. Per section 27(2)(b): Not to take any step to withdraw the plan and report monthly (from the date of this letter) to my officials on the progress of the plan;**
- 6. Per Section 27(2)(b): Progress the plan up to the end of the examination process;**
- 7. Per Section 27(4)(b): On conclusion of the examination, to publish the Planning Inspector's recommendations and reasons; and**
- 8. Per Section 27(5)(b): On conclusion of the examination, to consider adopting the plan, including any main modifications recommended by the Planning Inspector deemed necessary to make the plan sound.**

Pursuant to section 27(8) of the 2004 Act, the Secretary of State has issued directions under section 27(2) and section 27(5) in order to ensure that, following the modifications required by direction under section 21(1)(a), the plan is afforded the best possible opportunity to undergo independent examination. The intention is to enable the Inspector to determine whether the modified plan is legally compliant and sound.

Finally, to avoid delays to plan making and ensure the plan is submitted for examination before the December 2026 deadline, per section 15(4) of the 2004 Act, I am also directing the Council to:

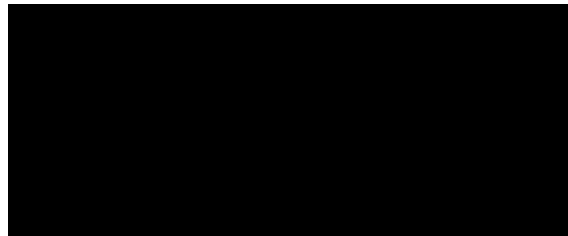
- 9. Per section 15(4) of the 2004 Act: Publish on your website a revised Local Development Scheme by 30 June 2026 to reflect directions set out above. For avoidance of doubt this should include the following milestones:**
  - Regulation 19 consultation to commence by no later than 31 July 2026
  - Submission of the plan for examination should be no later than 30 November 2026

The above directions will remain in force until withdrawn by the Secretary of State. Should you fail to comply with the directions in this letter, I will consider taking further action.

Notwithstanding this direction and the evidence you have already provided, I would like to give you an opportunity to set out by 25 March 2026 any exceptional circumstances which in your view suggest that intervention is not appropriate in this case. To be clear, this neither alters nor removes the direction set out in this letter.

I want to reiterate that I am committed to working constructively with you to ensure that Three Rivers can deliver the high-quality homes and essential infrastructure needed to underpin ambitious and sustainable growth. My officials will maintain ongoing engagement with your officers and will be in touch shortly to discuss next steps.

Yours sincerely,



**MATTHEW PENNYCOOK MP**  
Minister of State for Housing and Planning



Ministry of Housing,  
Communities &  
Local Government

**Matthew Pennycook MP**  
*Minister of State for Housing and  
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Cllr Glenn Haffenden  
Leader of Hastings Borough Council  
Muriel Matters House  
Breeds Place  
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TN34 3UY

Cllr Mark Etherington  
Strategic Planning and Climate Adaptation Portfolio Holder  
Muriel Matters House  
Breeds Place  
Hastings  
East Sussex  
TN34 3UY

13 February 2026

Dear Cllr Haffenden and Cllr Etherington,

As you know, this government is a firm advocate of a plan-led system. It is through local development plans that communities best shape decisions about how to deliver the housing and wider development that their area needs, and those plans must remain the cornerstone of our planning system. Without an up-to-date plan in place, there is a high likelihood that development will come forward on a piecemeal and speculative basis, with reduced public engagement and fewer guarantees that it will make the most of an area's potential.

In this context, I am concerned that your Regulation 18 draft plan, scheduled for consultation later this month, contains a minimum housing requirement of 175-187 dwellings per annum (dpa), a figure which represents less than 27% of the area's current Local Housing Need (LHN) of 697 dpa.

The National Planning Policy Framework (NPPF) sets a clear expectation that plans should be positively prepared – providing a strategy which, as a minimum, seeks to meet a Council's development need. This will be a key consideration for the independent Inspector in evaluating whether Hastings' local plan can be found 'sound'.

National planning guidance sets out the steps authorities should take if they cannot identify enough sites to meet needs. They should first revisit their assessments and assumptions about development potential of specific sites. If evidence shows that needs still cannot be met within

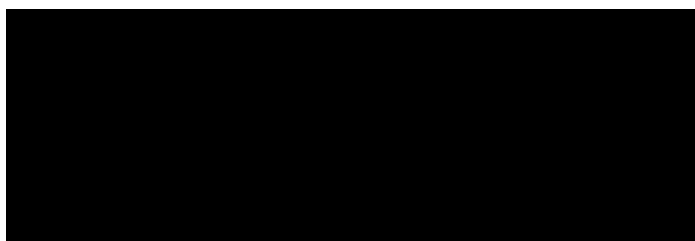
the area, authorities must work with neighbouring areas through statements of common ground to explore whether unmet needs can be accommodated elsewhere. If, after this process, needs remain unmet, the authority must clearly and robustly explain the reasons during the plan examination.

To ensure that Hastings Council has left no stone unturned in its efforts to identify land that is suitable for development, I have asked the Planning Inspectorate to hold an Advisory Visit with the Council over the coming weeks. The primary purpose of this meeting should be to examine whether the approach that the Council has taken to meeting its development needs is robust and capable of being found sound at examination.

Planning Advisory Service (PAS) is also able to offer support and advice on local plan progress. I understand that your officers are already engaging with PAS and I urge you to continue to do so should further support be beneficial in facilitating delivery of a sound plan.

I hope the Council will engage constructively with both further Advisory Visits and PAS support and I have instructed my officials to monitor the outcomes of these sessions and update me accordingly.

Yours sincerely,



**MATTHEW PENNYCOOK MP**  
Minister of State for Housing and Planning