

Date 5 March 2026
Our Ref PL010-645 HR

Planning Policy Team
Rother District Council

By email only: draftlocalplan@rother.gov.uk

Dear Sir/Madam

**ROTHER DISTRICT COUNCIL – LOCAL PLAN 2025-2042– DEVELOPMENT
STRATEGY AND SITE ALLOCATION
REGULATION 18 CONSULTATION 2026
REPRESENTATIONS ON BEHALF OF MR S FAULKNER**

Land opposite St John the Baptist Church, Vicarage Lane, Westfield

On behalf of my client, Mr S Faulkner, I write to make submissions to the Rother District Regulation 18 Local Plan 2026 consultation. This follows representations previously made in June 2024. The site has not yet been assessed in the council's most recent HELAA despite the previous representations being made in 2024.

Since the last representations, high level pre application discussions have taken place with Rother District Council regarding development on site. As part of the pre application enquiry a Heritage Assessment and a Landscape Assessment were commissioned. These have been submitted alongside these representations to demonstrate that heritage and landscape matters on site can both be overcome with a sensitive, low density scheme.

*Mr S Faulkner has control over land opposite St John the Baptist Church, Vicarage Lane, Westfield along with his family members Mr Timothy Faulkner and Lady Amanda White-Spunner. The land has been identified as WES0039 in the Council's HELAA online mapping system, see **Figure 1** below. My client also owns the land identified as WES0035 and WES0053. The land most suitable for immediate development is WES0039 and half of WES0053 and these representations therefore focus on this parcel as identified in **Appendix 1**. This is also the parcel that has been subject to pre application discussions with the Council however the additional parcels are also available for development, should the council consider them suitable.*

*It is proposed that the boundary of parcel WES0039 is extended as shown in **Appendix 1** to give a larger quantum of land to facility landscaping measures and/or BNG requirements.*

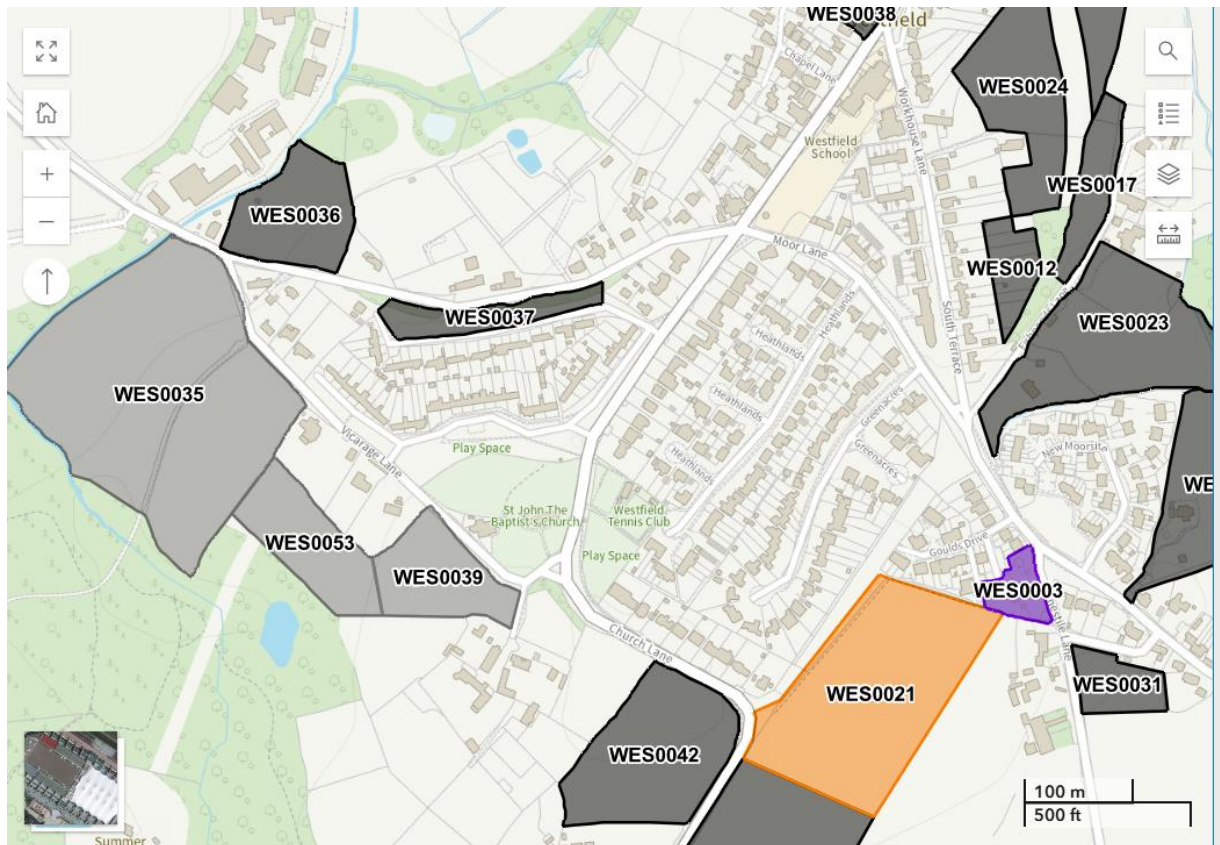


Figure 1: Extract of Westfield from HELAA

These representations relate in particular to the following parts of the Regulation 18 document, titled Rother Local Plan 2025-2042 – Development Strategy and Site Allocation.

- *Housing Need*
- *Proposed Strategy: Overall Development Strategy*
- *Vision for Southern Rother and the Hastings Fringes*

Housing Need

The key objective to significantly boost the supply of housing remains a focus of planning policy at all levels. Paragraph 61 of the NPPF states that to support this aim it

is important to ensure a sufficient amount and variety of land can come forward where it is needed.

In addition, paragraph 11b of the NPPF states:

'Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area;

or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.'

The Regulation 18 consultation identifies the housing need in the district as 15,504 homes for over the plan period 2025 to 2042. This figure was derived using the Standard Method, as required by the NPPF and accompanying Planning Practice Guidance (PPG). This amounts to 912 dwellings per annum. It is not clear from the Regulation 18 consultation whether this figure includes a 20% buffer to be applied as a result of under delivery as set out at paragraph 78 of the NPPF. If the 20% buffer has yet to be applied, housing requirement would increase to 1094 dwellings per annum -18,598 dwellings over the plan period.

In any event, the Council have confirmed they do not in fact intend to meet their full housing need (as calculated by the standard method) for a number of reasons most notably the significant landscape, flooding and heritage constraints which exist across the district. We accept that footnote 7 of paragraph 11 of the NPPF allows for a reduction in housing delivery in areas restricted by certain designations, including National Landscape, of which a significant part of the Rother District falls within. However, we do not consider the lower housing figures offered in the Regulation 18 Consultation have been justified or that sufficient reason has been given for not meeting the higher housing need figure required by the standard methodology.

The history of under delivery of housing since the adoption of the Core Strategy is well documented (as set out paragraph 3.3 of the Regulation 18 Plan) which makes all the more pressing case for the Council to be taking a more radical approach to positively plan for a higher level of housing.

The Council have made a brief reference in the Regulation 18 plan to a few reasons as to why they cannot meet their housing need figure calculated using the standard methodology including:

- *Landscape constraints*
- *Constraints resulting from areas lying within flood zones*
- *Heritage Assets*
- *Internationally and nationally designated habitats sites, covering roughly 7 per cent of the district, that must be conserved.*
- *Highest proportion of ancient woodland (compared to land area) in South-East England.*

Beyond a passing reference to the above constraints the Council has not set out in detail why they cannot meet their full identified housing need. We would note that under the previous Regulation 18 Consultation, heritage assets and the extent of ancient woodland in the district were not cited as reasons for limiting the level of housing to be provided. It is unclear as to why these are now considered to be constraints on the level of housing that can be developed. In our experience of development sites, nearby heritage assets and ancient woodlands are usually constraints that can be worked around with appropriate buffers/mitigation and design so we do not consider them to be a constraint on the quantum of development that can be delivered across the district.

The land subject of these representations lies within the High Weald National Landscape but is well-screened by mature vegetation, some of which is Ancient Woodland and would therefore not be highly visible from wider ranging views. The land also lies within Flood Zone 1 so it is not constrained the flooding constraints cited by the Council as a reason to not meet full identified housing need being entirely within flood zone 1.

The Church Place development, which lies to the south-east contains a statutorily listed building known as Church Place Farm. There are however a number of former outbuildings which have been converted to residential uses including holiday lets physically separating the listed building from the subject site. The church, which lies opposite the site, is also listed however this is physically separated from the site by the road, church yard and informal parking area. Whilst these listed buildings are within the vicinity of the site, they are not considered to be a constraint to the development of the site as detailed further in the heritage section below. Similarly, whilst there is ancient woodland on the secondary parcels identified, the required buffers will not impact the developable area of the primary parcel being promoted for immediate development. This is discussed further in the landscape section below.

There is an existing field access into the site which would be closed as part of the proposed development and a new access would be created further along Vicarage Lane to improve visibility in both directions. Existing informal parking which occurs immediately outside the site would also be formalised to continue to provide parking for those using the church facilities. There is also an option of creating a new footpath link to Church Lane to enhance sustainable transport options.

Proposed Strategy: Overall Spatial Development Strategy

The Regulation 18 draft local plan identifies a number of spatial strategies across the district to respond to different circumstances, including some additional development within Westfield.

We support the principle of employing a number of spatial strategies to provide the flexibility to respond to differing circumstances and as a village with good sustainability, in addition to connectivity to higher tier settlements, Westfield makes a logical focus for additional growth.

Vision for Southern Rother and the Hastings Fringes

The vision for Southern Rother and the Hastings Fringes states that there is potential to deliver 382 dwellings across the sub-area. Westfield is identified as a settlement within this sub area however despite Westfield being defined as having good sustainability, only 70 dwellings are currently proposed via draft allocation, on two old allocations that have to date, failed to deliver any housing. To have so little housing proposed within a settlement identified as having 4 out of 5 of the key services considered in their sustainability matrix indicates that the Council have not taken serious steps to seek to meet their housing requirements and indicate that the plan has not been positively prepared.

Of the 2 residential allocations within the village, one site has been allocated since 2019 for 20 dwellings. An outline application made in 2022 was finally granted in June 2025, see reference RR/2022/1118/P: outline planning permission for up to 20 dwellings with new access from Cottage Lane. The other was also allocated previously for 40 dwellings, which has now increased to 50, but instead has a refused application for a 64 bedroom care home. There is also no guarantee that with a valid planning consent that the sites will still be delivered. There is therefore no clear indication that either site is likely to meet the 70 dwellings proposed in the emerging plan and therefore it is essential that additional sites within Westfield, where the owners have made it clear that they intend to bring forward development immediately, are allocated within the emerging Local Plan.

The vision states that 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. We contend that this site is exactly the type of site that should be delivered to accord this vision as it is small scale, immediately adjoins the existing settlement boundary of a sustainable settlement and could deliver housing in line with the existing building line without having any additional impact on the High Weald NL.

The land at WEA0039 could bring forward an immediate planning application for a sensitively designed small scale housing scheme delivering quality family housing in the short term. Paragraph 70 of the NPPF recognises that small scale developments can deliver housing at a faster rate. The land is owned outright by the Faulkner family and so there are no third party ownership issues which might prevent or delay delivery. It is anticipated that a small-scale development here could be delivered at a relatively quick rate to help meet local housing needs swiftly.

In accordance with the Government's objective of significantly boosting housing supply we contend the Council should pursue a higher growth strategy to fully meet the full identified housing need for the plan period. Adopting this approach will allow the Council to develop a long-term sustainable growth strategy which provides flexibility to adapt to changes in demand and allow for the inevitable cases where development does not come forward for some reason or under delivers. This is particularly the case given the history of under delivery in the district, especially within Westfield. It would also allow for a more consistent delivery rate, allowing for a wider range of smaller sites, such as the land identified as WES0039, to be delivered while the infrastructure is put in place to serve larger developments.

Site Specific Considerations

The submitted land identified at Appendix 1, immediately adjoins the current development boundary of Westfield which has been identified as a moderately sustainable settlement.

Footpaths within the vicinity of the land provide access to a range of facilities within Westfield, with a footpath running through the churchyard opposite directly into the village. Whilst these footpaths are not formal rights of way, the landowner has liaised with the Chichester Diocese has received written confirmation that if the site is developed, residents are welcome to use the paths to access the village. The correspondence with the Senior Church Buildings and Pastoral Reorganisation Officer states:

'I understand that there are several pathways across the churchyard at Westfield, connecting the church, hall and vicarage to each other and the surrounding roads. Although there are no formal rights of way, the churchyard is open to the public and the parish have confirmed that they are very happy for local people to use their footpaths. We very much hope that the church will continue to play an important role at the centre of the community for many years to come, and don't anticipate the situation with the footpaths changing in the future.' Full email correspondence can be provided on request if required.

The evidence base document Settlement Study identifies Westfield as being moderately sustainable, however it has 4 out of the 5 essential services used in the scoring matrix. It states that the main factor holding back Westfield from being considered more sustainable is the lack of employment sites however the local plan does not seek to allocate any sites for new housing which again indicates the plan has not been positively prepared. Furthermore Westfield is just 6 miles north of Hastings on the A28 meaning most employment opportunities within Hastings would also be available to residents of Westfield.

Westfield village offers a range of shops and facilities including a pub, a primary school, a restaurant and a church as well as a local store with a Post Office, a hairdresser, a beautician, a butcher and a pet grooming shop. All these are within walking distance of the proposed site on Vicarage Lane. Also within the Parish is the Carr Taylor vineyard and a business park for 13 small rural enterprises as well as Freshfields Farm which comprises a range of commercial and retail uses. Bus stops within walking distance of the site provide regular services to Hastings, Battle and Bexhill all of which have train stations providing services to London amongst other locations.

Landscape

The land subject of these representations lies within the High Weald National Landscape but is well-screened by existing mature vegetation, some of which is Ancient Woodland and would therefore not be highly visible from wider ranging views. A landscape assessment has been undertaken which is submitted alongside these representations.

The landscape assessment confirmed that a scheme could be delivered that would not have a detrimental impact on the location within the National Landscape. It states that whilst the proposal would inevitably change the character of the site as it would take on a developed character, the site sits in a gap between The Vicarage and The Parlour/Church Place Farm, and development already extends along Vicarage Lane, which lies at the edge of the settlement. It states that 'The proposal is consonant with the existing settlement pattern; development traditionally extended along existing lanes,

and this form of development is more likely to conserve and enhance the character of the National Landscape than development based on cul-de-sacs.’ This relates to a proposal where housing would face the road in a linear layout, reflecting the building line to the northwest.

It is therefore clear that whilst the character of the field would change if developed, it would not necessarily have a negative impact and could be designed in a way to work well within the wider context. The report goes on to state that the surrounding context includes the church, Church Place Farm and Vicarage Lane, which together create a sense of local identity. Whilst there are some views to the surrounding countryside the site lies at the edge of the village, and there is a settled character. It confirms that a linear infill development at this site would not disrupt that character, confirming that ‘the locally distinctive features mentioned above would remain in place and would continue to contribute to the character of the National Landscape. The church and churchyard form a focus for the southern part of the village, but it is important to note that the churchyard is effectively contained within the settlement and is overlooked by existing housing. Vicarage Lane is a characterful historic route. Historic lanes however are not necessarily undeveloped. Development tended to occur historically along existing routes, and this can be part of their character, as is the case with Vicarage Lane.’ The assessment demonstrates that new development does not need to automatically be considered inappropriate or detrimental purely due to its location within the National Landscape and or due to the proximity to heritage assets, which are discussed more below.

Heritage

Westfield does not feature in the Council’s Heritage Background Paper. Paragraph 215 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. The site subject of these representations is well screened from views of the listed church by existing vegetation along its southern boundary. Whilst it is acknowledged that the extent of screening is likely to change seasonally, the heritage assessment states that the church is of squat design and its tower is relatively short. It therefore does not function as a landmark building within its immediate landscape and cannot be perceived in medium and long-distance views.

It goes on to state that due to the landscaping and boundary treatment of the churchyard, as well as the presence of graves and other objects associated with the church, it can be argued that the setting of the church is restricted to the churchyard itself, and that the surrounding roads, Churchfield to the north, the A28 to the east, and Vicarage Lane to the south and west, fracture the setting of the church from its wider

context. Additionally, this wider context of the church has been compromised by later development, especially to the east and north. Any historic (functional or ownership) association of the church with the Church Place Farmhouse or the Vicarage has been lost, and these buildings are no longer appreciated together.

The submitted heritage assessment also considered the setting of Church Place Farmhouse which it concludes has been compromised by a number of modern additions within its immediate setting, with the modern buildings acting as a visual buffer between the proposed development site and the listed building. On this basis, the contribution the development site makes to the setting of Church Place Farmhouse is considered to be minimal.

This confirms that the proximity to the Grade 1 listed church and the grade 2 listed farmhouse should not be a reason to discard this site from the emerging local plan, despite the draft plan identifying heritage assets as a barrier to delivering the required housing within the district in the local plan period.

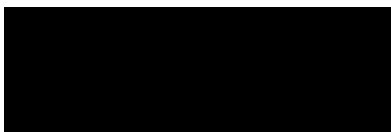
Conclusion

Professional reports have already confirmed that small scale housing could be delivered on the site without having a detrimental landscape or heritage impact and would have no impact on the Ancient Woodland assuming 15m buffers are retained, which is entirely achievable. The site is flood zone 1 and not within an identified protected habitat. Therefore, all the barriers to delivering the true housing needs identified by the council have been demonstrated to not apply to this site. In light of this, and the fact the site immediately adjoins the settlement boundary of a sustainable settlement identified for growth, there is no clear planning reason for not allocating this site for housing in the emerging local plan. Small-scale development on the submitted site would relate well to the existing built form of Westfield and would be well-screened by existing development and swathes of ancient woodland.

I trust that the enclosed information is clear and I look forward to receiving confirmation of receipt of this submission.

In the meantime, should you require any further information, please do not hesitate to contact me.

Yours faithfully



Harriet Richardson BA (Hons) MSc MRTPI

*Enc. Heritage Assessment
Landscape Assessment*

APPENDIX 1 **Land proposed for immediate allocation**

