

Sedlescombe Parish Council Response to Proposed Site Allocations.

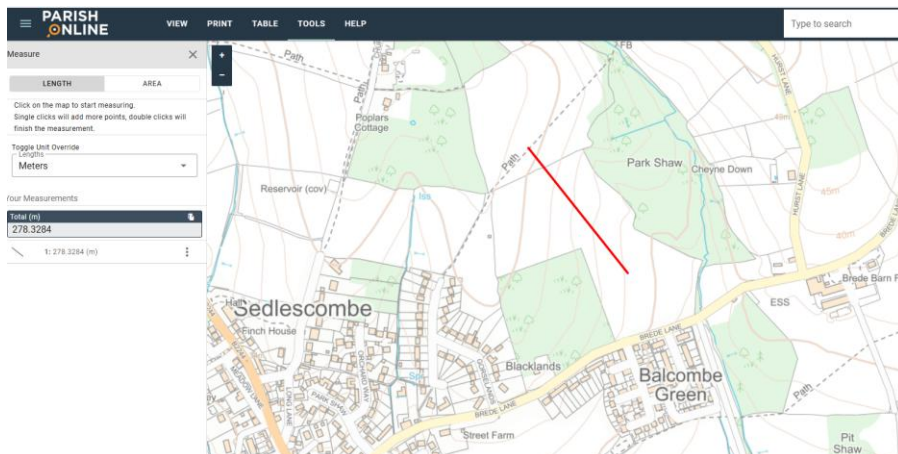
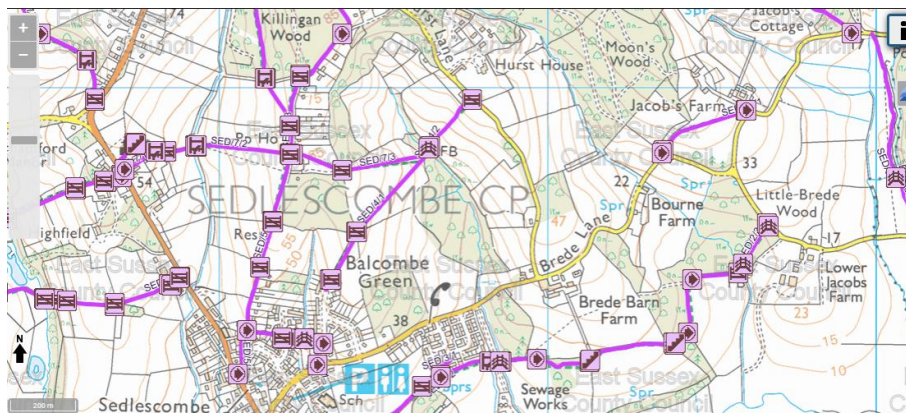
Sedlescombe SD11

The Parish Council **formally objects** to the proposed allocation of Site SD11 for the reasons set out below.

1. Site Location and Landscape Impact

The site is positioned at the edge of the village along an already heavily trafficked C-class road. Although technically adjacent to the development boundary running along Brede Lane, the site is separated from the established settlement pattern. It lies opposite existing dwellings at East View Terrace and is screened by a substantial roadside hedge, beyond which the land reads clearly as open countryside.

The site is highly visible from Public Footpath Sed/4/1, with uninterrupted views across the valley. Development of approximately 38 dwellings in this location would therefore appear prominent and visually intrusive within the wider landscape (as shown below).



The site falls within the **High Weald National Landscape**, where national and local policy requires development to conserve and enhance landscape character. While it is acknowledged that central government has increased housing requirements for Rother District, this does not justify the allocation of sites that would cause permanent harm to this nationally protected landscape. Housing need must be balanced against environmental constraints; failing to do so risks irreversible damage to the defining qualities of the High Weald.

Paragraph 189 of the NPPF is clear:

‘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. 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.’

This proposed allocation fails the test of Paragraph 189

Furthermore, the site is physically detached from the settlement. It is bounded by agricultural fields on two sides, priority habitat woodland on a third, and a mature hedge that prevents integration with the built form along Brede Lane. The resulting development would appear isolated rather than a logical extension to the village.

2. Conflict with the Sedlescombe Neighbourhood Plan

The Sedlescombe Neighbourhood Plan identifies a requirement for **35 dwellings** to meet the current Local Plan target. However, approved schemes, applications at Section 106 stage, and emerging proposals already total approximately **73 dwellings**, representing substantial growth for a village of this scale.

Sedlescombe Housing		Application Number	Number	Comment
Housing required to be allocated at 2016-2028			35	
Delivery to date				
Policy 2 Sunningdale		RR/2019/2485/P	8	Approved
Policy 4 Land at Church Farm Nth of Village Hall		RR/2024/1016/P	12	approved subject to S106
Policy 6 Land Adjacent to St Johns Church		RR/2024/1825/P	17	Waiting for approval
Policy 7 Land Gate Cottage		RR/2023/1046/P	5	Approved
Policy 8 Land at Church Hill Farm			10	Access only waiting for approval
The Paddock		RR/2022/2619/P	21	Approved
		Total	73	

Allocation of a further 38 dwellings would more than double the neighbourhood requirement and increase the number of homes already in the pipeline by roughly **52%**. No evidence has

been presented by the District Council to demonstrate a specific housing need that would justify development of this magnitude in Sedlescombe.

Significantly, housing delivery within the district has remained broadly unchanged for many years. Additional allocations do not automatically translate into increased housing supply, particularly where market absorption is limited. This concern is reinforced locally by two recently completed dwellings in the village centre that have remained unsold and unoccupied for approximately three years.

3. Highway Safety Constraints

The site is located on Brede Lane within the 30-mph zone, immediately adjacent to the transition to the national speed limit. The roadside boundary is defined by a mature hedge positioned directly at the carriageway edge.

It is difficult to see how the required visibility splays could be achieved in either direction:

- To the east, the proximity to the unrestricted speed zone would necessitate a visibility splay of approximately **2.4 m × 240 m**, which is clearly unattainable from any point along the frontage.
- To the west, achieving even a standard **2.4 m × 43 m** splay would likely require removal of the entire hedgerow if an access were positioned midway along the site boundary. Such loss would itself be harmful to local character and biodiversity.

On this basis, there is a serious and unresolved question as to whether safe vehicular access can be delivered. A site cannot be considered for allocation of highways visibility requirements have not or cannot been met.

4. Section 106 Constraint (RR/2004/1815/P)

The site forms part of the Brede Barn Farm holding and is subject to a Section 106 legal agreement that prevents the land from being sold separately or fragmented from the wider holding. A copy of this agreement has been provided.

The landowner has incorrectly advised that the land is available for development. It is not. Council officers were informed of this constraint prior to publication of the consultation. A site that is not legally available cannot reasonably be considered deliverable and therefore fails a fundamental test for allocation.

Conclusion

For the reasons outlined above, the proposed allocation is unsound:

- There is **no clearly evidenced need** for housing at this scale within Sedlescombe.

- The site is **detached from the settlement** and would cause unnecessary harm to the High Weald National Landscape and is conflict on Landscape grounds with the NPPF para 189.
- There is **no realistic prospect of achieving safe highway visibility splays**, even with substantial hedgerow removal and therefore the site does not meet the deliverability test for allocating a site.
- The land is **constrained by a Section 106 agreement** and is therefore not legally available for development.

Accordingly, the Parish Council respectfully requests that Site SD11 **be removed from the Local Plan site allocations**.

Response to Proposed Site Allocation – Sedlescombe SD10

The Parish Council strongly objects to the proposed allocation of Site SD10.

The site lies within the High Weald National Landscape, where national policy requires that great weight be given to conserving and enhancing landscape and scenic beauty. Multiple evidence-based assessments prepared by Rother District Council and East Sussex County Council between 2009 and 2022 have consistently concluded that development of this land would be unacceptable. Nothing material has changed in site conditions to justify a departure from these earlier findings.

Furthermore:

- Sedlescombe has already significantly exceeded its identified housing requirement.
- The proposal conflicts with the strategy for **limited and modest growth** within National Landscapes.
- Serious concerns remain regarding access, flood risk, ownership, deliverability, and environmental impact.

Taken together, the proposed allocation cannot be considered **justified, effective, or consistent with national policy**, and should therefore be removed from the Local Plan.

1. Landscape Impact and National Policy Conflict

The Parish Council formally objects to the proposed allocation for the reasons set out below.

The site is located within the **High Weald National Landscape**, where national and local policy requires development to conserve and enhance landscape character. While increased housing targets are acknowledged, this does not justify allocating sites that would cause permanent harm to a nationally protected landscape. Housing need must be balanced against environmental constraints; failure to do so risks irreversible damage to the defining qualities of the High Weald.

Paragraph 189 of the National Planning Policy Framework states:

“Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes... The scale and extent of development within all these designated areas should be limited...”

The proposal clearly conflicts with this requirement.

2. Longstanding Evidence Demonstrates the Site is Unsuitable

The Council's own evidence base consistently identifies this site as inappropriate for development:

- **2009 – Market Towns and Villages Landscape Assessment:**
Concluded that “*development would not be acceptable beyond the development boundary.*”
- **2013 – Strategic Housing Land Availability Assessment (SHLAA):**
Policy officers determined the site was “**Not Suitable.**”
- **HELAA (2022):**
Continued to identify significant constraints.

Landscape Character Assessment Sheet

Ref: Sedlescombe – S2

Location: West of Village

County Landscape Character Area: Brede Valley

Viewpoint No: 2

Direction of View: North



Description

This is pleasant and tranquil countryside and an area of transition from large gardens and large houses. There are meadows with horse paddock and some loss of field structure due to removal of hedges. There are enclosed gardens with garden vegetation including feature pine trees on the higher ground.

Evaluation Scores

Quality	-	Good
Value	-	High (AONB)
Sensitivity:		
Visual	-	Moderate / High on upper slopes
Character	-	Moderate

Landcover and landscape elements

farm buildings	walls	woodland (broadleaf)	x	river	footpath	x
churches	fences	x	plantation	stream	x	track
masts, poles	hedges	x	isolated trees - pines	x	lake	road - lanes
pylons	banks	tree clumps	reservoir	motorway		
industry	shelterbelt	hedgerow trees	pond	railway		
vernacular buildings	x	field pattern	x	canal - ditches		
settlement (ribbon)	arable	parkland	x	waterfall		
built-up - edge	pasture	x	marsh	beach		
mineral working	orchards			dune		
ruins				mudflat		

Landform			
flat		plain	coast
undulating	x	rolling lowland	x
rolling		plateau	broad valley
steep		hills	narrow valley
vertical		scarp	deep gorge
		cliff	

Aesthetic factors					
BALANCE:	harmonious	balanced	x	discordant	chaotic
SCALE:	intimate	small		medium	x large
ENCLOSURE:	confined	enclosed in gardens		open	x exposed
TEXTURE:	smooth	textured	x	rough	very rough
COLOUR:	monochrome	muted	x	colourful	garish
DIVERSITY:	uniform	simple		diverse	x complex
MOVEMENT:	remote	vacant		peaceful	x active
UNITY:	unified	interrupted		fragmented	chaotic
FORM:	straight	angular		curved	x sinuous
SECURITY:	comfortable	safe	x	unsettling	threatening
STIMULUS:	boring	bland		interesting	x invigorating
PLEASURE:	offensive	unpleasant		pleasant	x beautiful

Landscape Condition

Generally good. Well managed gardens. Grazed meadows and paddocks.

Most Appropriate Management Strategy

Conservation

Mature trees and hedges. Setting of historic houses.

Ability to Accommodate Change/stability of character/attributes vulnerable to change and which are irreplaceable.

Low / Moderate capacity. This is limited to infill in the less sensitive plots. Development would not be acceptable beyond the development boundary.

ID	Site Name	Compliance with Core Strategy Policy	Total Residential Units	SHLAA Conclusions
SE2	Land North of Gorselands, Sedlescombe	Elevated field currently used for horse grazing. Crossed by a public footpath. Development here would extend beyond existing northern limit of the village onto a spur of high ground. There are views over the village southwards to the wider countryside. The very prominence of development would make it incompatible with conserving the character of the AONB. Also, development would sit notably above existing properties on Gorselands. Access via Gorselands is possible, although further Highways advice on acceptability of road standard and effect of on-street parking would be needed. In conclusion, development would be contrary to policies to conserve the AONB and the character of the locality (see policies OSS4, OSS5, EN1).	N/a	Not suitable (red site)

POTENTIAL SITES (Sites are potentially suitable, potentially available and potentially deliverable, subject to further assessment or investigation)

Site ID	Site Address	Site size (hectares)	Summary of Environmental Constraints	Site Identification	Site Assessment	Availability	Estimated Development Potential	Anticipated Timescale for Development
SED0020	Land north of Gorselands, Sedlescombe	2.62	The site is within the High Weald National Landscape. Adjacent to Priority Habitats and protected trees. Small areas at risk of surface water flooding on western boundary. Historic field boundaries adjacent. Public footpath within the site.	Submitted site	The site is an undulating field to the north of a 20th century residential estate, Gorselands. The southern part of it is relatively enclosed in the landscape, although the northern section, which rises, is more exposed. In landscape terms, some development could potentially be accommodated across part of the site, which could continue the existing pattern of development northwards. However, the principle of developing the site in terms of the effect on the character of the National Landscape requires further consideration as this is a historic field, possibly an early Medieval Formal Enclosure with historic boundaries. The access road would need to be widened to serve a development and while it appears the landowner owns sufficient land to achieve this, this would need to be confirmed. The developable area of the site is further constrained by the topography, a public footpath running through the site, and Priority Habitats including protected trees adjacent to site boundaries.	Potentially available	Residential: 15 dwellings	Within 5 years

It is notable that no assessment undertaken by either Rother District Council or East Sussex County Council over a period exceeding a decade has found the site suitable.

Crucially, **nothing has materially changed** in relation to the landscape, settlement pattern, or surrounding development that would justify reaching a different conclusion today. Plan-making must be grounded in consistent, proportionate evidence. To allocate land previously found unsuitable, without any meaningful change in circumstances, would **be irrational and unsound**.

Moreover, the allocation cannot reasonably be described as conserving or enhancing the National Landscape and therefore conflicts with:

- NPPF paragraphs **189 and 190**
- **Section 85 of the Countryside and Rights of Way Act (CROW)**, which requires decision-makers to have regard to the purpose of conserving and enhancing natural beauty.

Landscape harm alone provides a clear and defensible reason for rejecting the allocation.

3. Housing Need Does Not Justify the Allocation

The Local Plan requirement for Sedlescombe is **35 dwellings**.

Neighbourhood Plan allocations already provide for approximately **36–39 dwellings**, alongside additional sites with unspecified capacity. When approvals and emerging schemes are considered, the village has already delivered **well over double** the required housing figure.

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Sedlescombe should properly be regarded as a **Category C village**, where Policy OSS1 supports **limited growth** in settlements with a modest range of services.

Growth within the High Weald has always been expected to remain **modest and proportionate** in order to minimise landscape harm. The proposed allocation would add approximately **33%** to a requirement that has already been exceeded by around **100%**.

No robust evidence has been presented to demonstrate a specific housing need that would justify development of this scale.

Accordingly, the need to protect the National Landscape clearly outweighs any marginal benefit arising from additional housing.

4. Access and Highway Concerns

As the allocation relies fundamentally on the suitability of the access, this issue is critical.

During the Neighbourhood Plan process, the Highway Authority assessed the access as **unacceptable**. A later informal view suggested it was “potentially acceptable,” despite no material change to the physical characteristics of the site.

Such inconsistency raises serious concerns regarding the robustness of the assessment.

Even if widened, the access presents clear constraints:

- Three steep private drives connect directly into the proposed access point.
- The route shares a well-used public right of way.
- Gorselands is notably narrow with limited off-street parking.
- The development would introduce approximately **22 additional vehicles** onto this constrained street.

Traffic would then feed onto Brede Lane, an area already affected by congestion due to the proximity of the village car park, school, public house, hotel, and the approved **Paddock** development (21 dwellings). The two access points sit directly opposite one another, compounding highway risk.

Visibility when emerging from Gorselands is already poor. The cumulative effect of vehicles from an additional 33 dwellings would materially worsen highway safety.

The suitability of the access has therefore not been demonstrated.

5. Surface Water and Flood Risk

The allocation fails to adequately address a well-established problem of surface water runoff from the field onto Gorselands during periods of heavy rainfall.

Introducing a hard-surfaced access road would inevitably increase runoff volumes.

The proposed allocation has not applied the required **sequential, risk-based approach** mandated by the NPPF, which states:

“All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk.”

Failure to undertake this assessment represents a significant evidential gap and the site cannot be allocated before this test is completed as to do so may cause the **site to be undeliverable and thereby failing the test for allocation**.

6. Ownership, Rights, and Deliverability

While it is understood the applicant owns parts of the verge connecting the field to Gorselands, neighbouring properties appear to have used and improved sections for parking and may have acquired private rights.

The precise extent of land ownership, and whether third-party rights exist, has not been clearly established.

If the applicant cannot demonstrate full control of the access, the site cannot be considered **deliverable and therefore fails a fundamental test for allocation**.

7. Public Rights of Way, Biodiversity, and Environmental Constraints

A well-used public footpath (Sed 4/1) runs through the centre of the site, and the development would be highly visible from both this route and the elevated Sed 5/2 footpath approximately 220 metres to the west.

These paths form part of a valued circular recreational walk.

The proposal to divert the footpath to accommodate private gardens is fundamentally inappropriate within a protected landscape and conflicts with the strengthened duty under the CROW Act.

Additional concerns include:

- Evidence of badger activity, a protected species, requiring full ecological assessment prior to allocation.
 - Uncertainty regarding water supply capacity.
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Conclusion

The proposed allocation is unsound for multiple reasons:

- It would cause unacceptable harm to the High Weald National Landscape.
- It contradicts longstanding evidence identifying the site as unsuitable.
- There is no demonstrable housing need.
- Access and highway safety remain unresolved.
- Flood risk has not been properly assessed.
- Ownership uncertainties call deliverability into question.
- Environmental impacts have not been adequately addressed.

The proposal conflicts with saved Core Strategy policies **RA1, RA2, RA3, OSS1–OSS4, and EN1**, as well as national policy and the statutory duty under the CROW Act.

Accordingly, the Parish Council respectfully requests that Site SD10 be removed from the Local Plan.