

draftlocalplan@rother.gov.uk

19 March 2026

Dear Sir/Madam

Re: Response from CPRE Sussex to the Reg 18 Consultation on the Rother Local Plan to 2042

I am writing on behalf of the CPRE Sussex, the Sussex branch of the Campaign to Protect Rural England, registered charity 1156568. We set out below our reactions to the current Regulation 18 consultation on the Rother Local Plan.

Housing targets

First and foremost, we recognise the unacceptable and practically impossible position that Rother, as a Local Planning Authority, has been placed in by the Government's approach to housing targets.

The 'Standard Method' produces an entirely unrealistic target of over 900 new dwellings per annum (dpa) for the entire District. The formula that produces this total is, in any case, largely disconnected from real local need.

As the Draft Plan notes, c. 90% of the District is covered by the High Weald National Landscape or protected habitat site, and in practice, housing delivery over recent years has been well below the current 335 dpa target, at 215 dpa.

It is entirely appropriate therefore that the LPA is proposing a lower housing target than that suggested by the Standard Method, though sadly, we are sceptical that the Plan, with such a target, will either be allowed to proceed to examination by government ministers, or deemed sound by an Inspector at examination.¹

However, we do not believe that even this proposed lower target is acceptable or deliverable, given the other stated - and worthy - strategic aspirations of the plan (around landscape, nature, climate, water, community infrastructure):

¹ Planning Resource (2026) *Local Plan Watch: Council consults on draft plan that meets only 54% of housing need*
<https://www.planningresource.co.uk/article/1949751/local-plan-watch-council-consults-draft-plan-meets-54-housing-need>

In the introduction in Part 1, the Plan sets out the Rother Local Plan Strategic Spatial Objectives, The following are the relevant ones as far as Housing is concerned:

*7. **Focus growth in sustainable locations across the district, or places that can be made sustainable through supporting infrastructure and community facilities.***

*8. **Enhance the sustainability and connectivity of local communities through sustainable transport measures and improved internet network coverage.***

*9, **Support and achieve safe, healthy, vibrant and mixed communities where the physical and mental health of residents is a high priority. Create high standards of inclusivity and accessibility to shared facilities for all the district's residents.***

In Part 2 the draft sets out its Vision, overall Priorities and Objectives:

Development will be truly sustainable:

Major development will be focused in places where sustainable development can be achieved. All development will be net zero carbon ready and provide biodiversity net gain. Sensitive, sustainable and well-designed development that meets local housing and employment needs will be complemented by the timely delivery of supporting infrastructure. The district will contribute to the UK's carbon sequestration and nature recovery goals.

It then sets out two overall objectives. The first is 'Green to the Core' which it explains

Being Green to the Core means considering the impact of all planning decisions on the climate emergency, the biodiversity crisis and the High Weald Area National Landscape.

It means:

- **contributing to the radical reduction in carbon emissions required by national planning policy through planning for sustainable transport, net zero housing and renewable energy; and***
- **playing a key role in the UK's nature recovery and carbon sequestration through enhancing our landscape and environmental assets.***

The second is 'Live Well Locally', which explains:

*The Live Well Locally concept means considering, **when making all planning decisions, the goal of creating:***

Healthy, sustainable and inclusive communities that support residents across the age spectrum in terms of housing, access to jobs, services and facilities.

*'Connected and compact neighbourhoods' in our towns with 'village clusters' in our rural locations, **where people can meet most of their daily needs within a reasonable distance of their home, with the option to walk, wheel, cycle (active travel) or use public transport.***

Once proposed site allocations that do not meet these strategic priorities have been removed, the housing target must be reassessed.

Site allocations

Given these welcome strategic priorities, there are a number of proposed site allocations that we cannot support, and which we believe must be withdrawn. We recognise that this may make the position even more challenging in relation to the government's requirements and a potential plan examination, but we do not believe that these sites meet the requirements for

genuinely sustainable development, as required both by the National Planning Policy Framework, or by the Plan's own policies.

In line with our support for the 'bottom-up', community-led planning that is being undermined by the current government, we tend to support allocations that have been made within 'made' Neighbourhood Plans (at the scale agreed within those Plans).

We have been deeply pragmatic about the allocations that we are opposing here. Were the position created by government not so challenging, there would be others that we would actively oppose; as such, the following list is comprised of those that we consider completely untenable.

Unsustainable locations, by Rother's own evidence

The following sites are in communities classified by Rother's own Settlement Sustainability Study of 2024² as having low sustainability; as such, they cannot amount to sustainable developments, and nor can they be evidenced as sound:

Fairlight

- FA1 – Waites Lane – 35 dwellings – while this was previously allocated in the Development and Site Allocations Local Plan (DaSA), it remains a trouble-strewn site with flooding issues, and access off a remote road out of the village.

Guestling Green

- GU4 – Chapel Lane – 20 dwellings.
- GU5 – ex Highway Depot – 8 dwellings.

Three Oaks

- GU6 – Butchers Lane- 12 dwellings. This site is not adjacent to the existing built development (as highlighted in supporting text); it represents an encroachment to open countryside on the south-eastern side of Butcher's Lane, with Ancient Woodland adjacent to the north-east, 2 public paths crossing the proposed site, ponds and Halfhouse Wood to the south-west. This encroachment would erode the integrity of the surrounding Ancient Woodland which is irreplaceable habitat. The supporting text further admits that development in this location will have impact the National Landscape.

Catsfield

- CT2 – behind and to the south of the public house – 20 dwellings. A development too far for the size and services of the village
- CT3 – Church Road – 35 dwellings. A previous proposal here did not proceed, on account of flooding and the impact on the High Weald National Landscape.

Beckley

² <https://rdcpublish.blob.core.windows.net/website-uploads/2024/04/Settlement-Study-Part-1.pdf>

- BC3 – Oaklea Cottages to the west – 15 dwellings. Ribbon development on south side. Extension westwards of Four Oaks hamlet.

Burwash Common (No housing allocations are made here within the current Neighbourhood Plan. Burwash Common is not a sustainable location, as Burwash is 3 km away.)

- BWC1 – South of Heathfield Road – 7 dwellings.
- BWC2 – North of Heathfield Road – 9 dwellings.

Stonegate The remoteness and lack of services here makes this a poor location.

- SG1 – Lymden Lane – 5 dwellings. (Also issues with car parking).
- SG2 – Bardon Road – 20 dwellings. (Also difficult access.)

Overwhelming settlements, infrastructure and landscape

Beyond these, the following stand out to us as inappropriate for a variety of reasons, including the creation of linear ‘ribbon’ developments, poorly related to existing settlements; the absence of sufficient infrastructure to cope with the scale of development – noting pressures on water and sewerage in particular; flood risk; and landscape impact, on the High Weald National Landscape especially:

Icklesham

- IK1 – Main Road (South) – 26 dwellings. Extending an already elongated ribbon development.
- IK2 – Main Road (North) – 32 dwellings. Extending an already elongated ribbon development. Would need an access off an existing side development for road safety reasons.

Battle

- BT1 – South of Hastings Road – 220 dwellings. While up to half of this site might be justifiable (noting that a small part of it is allocated in the existing Neighbourhood Plan), such a large site already on the edge of Battle starts to look unsustainable the further east it progresses.
- BT7 - Behind Tollgates – 80 dwellings. This is an extremely environmentally sensitive site, with Ancient Woodland on the boundary, flood risks, and high biodiversity value. Development here would rely on a single access to North Trade Road, beyond safe traffic management.
- BT10 – Telham – 65 dwellings. Behind an existing long ribbon development. The only local service is a bus route.

Broad Oak

- BR2 – North of Chitcombe Road -70 dwellings.
 - BR3 – Chitcombe Rd going west – 20 dwellings
- Broad Oak will struggle to absorb an extra 100 dwellings. BR3 in particular might be the straw that breaks the camel’s back.

Northiam

- NR2 – Coppards Lane – 25 dwellings. Northiam is very linear already but stretching this far beyond the core is too far for a substantial number of houses.

Playden

- PL1 – 25 dwellings. This location, south of Poppyfields is remote, and not fitting within local context. Access will be difficult from a narrow lane.

Etchingham

- EC1 – Off Oxenbridge Lane – 10 dwellings. Access back on to High Street is already difficult with parking permitted very close to junction. Flood risk high.
- EC3 A265 – 35 dwellings. Linear extension beyond what was previously understood to be the limit for development. Car access needs to be restricted if granted.

Hurst Green

- HG4 – land behind the Lodge – 150 dwellings. This is a massive extension (not the in the recently-adopted Neighbourhood Plan), given the size of the village, especially on top of HG2 and 3. Hurst Green does not have the capacity/infrastructure to absorb such a huge number.

Robertsbridge

- RB3 – Grove Farm 2 – 70 dwellings. This site was rejected by the Neighbourhood Plan because of topography, lack of sewerage, underground services on site and pressure created on George Hill.

Flimwell

- FW2 – North and south sides of Hawkhurst Road. Two barely linked sites, currently under complex multiple ownership. While the existing employment uses are to be saved and community services apparently to be provided, most of the current services are 2 km away at Ticehurst, and there is no local school.

We trust that the Plan will be duly amended before the Reg 19 submission draft.

Yours faithfully

Maria Tomalova

Planning Campaigner, CPRE Sussex