



Sedlescombe Parish Council

Minutes of the **Meeting of the Finance Executive Committee**

held on Tuesday 16th September 2025 at 18:30 in Committee Room 2 of Sedlescombe Village Hall

Present:

Cllrs. Jonathan Vine-Hall (JVH), Beverley Coupar (BC)(parish and district cllr), Jackie Saul-Hunt (JSH), Roy Chapman (RC), David Caney (DC)
Mrs Jackie Scarff (Clerk/RFO)

There were approximately 25 members of the public

Signed: *Jackie Scarff*
Clerk to Sedlescombe Parish Council
07531 065469 / clerk@sedlescombe.org.uk

Item	Agenda Item (P25.)	
48	<p>a To elect a chairman for the committee DC Proposed JVH become chair for the forth coming year, after being duly seconded it was unanimously agreed. Resolved JVH be chair of the committee.</p> <p>b To elect a vice chairman for the committee. JVH Proposed DC become vice chair for the forth coming year, after being duly seconded it was unanimously agreed. Resolved DC be vice chair of the committee.</p>	
49	<p>To receive and accept Apologies and reasons for absence (LGA 1972 s85 (1)) Resolved: Apologies were received and accepted from Cllrs K Saunders and G Anderson</p>	
50	<p>Interests in accordance with the Localism Act 2011 and the Parish Council Code of Conduct. To receive councillors' declarations of interest regarding matters on the agenda and consider any written requests for dispensation as a result. Cllrs JVH and RC declared that they knew the applicant to the application RR/2025/1121/P, JVH also declared that he knew the agent.</p> <p>To grant any requests for dispensation as appropriate. No requests</p> <p>Reminder any changes to register of interests should be notified to the clerk immediately.</p>	
51	<p>To consider for approval the terms of reference for the committee. Resolved that the terms of reference be approved.</p>	
52	<p>Public participation session re matters on the Agenda at the Chairman's discretion. Members of the public were invited to speak. Several aired their objections to the application which were unanimously supported by all.</p>	
53	<p>Applications to be considered:</p> <p><u>RR/2025/1121/P</u> Land north of Gorselands, Gorselands, Sedlescombe Outline application for construction of 11 dwellings, gardens, parking and access road, including improved access road from Gorselands all matters reserved except access.</p> <p>BC explained that she was the district councillor for Sedlescombe and that she had called the application</p>	

in to the planning committee if the RDC officer was minded to approve it.
After hearing all the representations from members of the public JVH proposed that the council object to this application and summarised the reasons.

Resolved: JVH would write the objection and circulate to cllrs for comment and agreement. The clerk to send the councils objection to RDC planning officers.

Appendix 1: Agreed objection

[RR/2025/1519/P](#)

Stream Farm, Stream Lane, Sedlescombe

Change of use of redundant farm building to holiday let.

Resolved: The cllrs had no objections at this time.

Sedlescombe Parish Council submission in relation to Planning Application **RR/2025/1121/P** Land North of Gorselands, Gorselands, Sedlescombe. Outline application for construction of 11 dwellings, gardens, parking and access road, including improved access road from Gorselands all matters reserved except access.

Sedlescombe Partish Council supports **REFUSAL** of this application for the reasons set out below.

1. The application is for a development of 11 houses outside the Sedlescombe Development Boundary and in the open countryside as set out in the Rother Local Plan (RLP) and Sedlescombe Neighbourhood Plan (SNP).
2. The Proposal is a speculative development as it is not on a site allocated either in the DASA or the SNP.
3. By definition this development is in the open countryside where development is highly controlled through Rother Policies RA2 and RA3. The application does not meet any of the exceptions in policy RA3 and should be refused on that basis.
4. The Parish Council understands that the Local Authority has had a persistent undersupply of housing below 3 years Housing Land Supply for some period of time and as a result the SNP's policies are considered out of date triggering Paragraph 11d of the NPPF which may allow development if that development can be demonstrated to be sustainable development which says:

'Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i the application of policies in this Framework that protect areas or assets of particular importance (footnote 7) provides a strong reason for refusing the development proposed; 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, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.'

5. However, In this case footnote 7 at point i is triggered as this site lies within the HWNL (previously HWAONB) which says:

- i ***The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change.'***

6. This in turn triggers Paragraph 189 of the NPPF:

'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.'

7. In addition, Paragraph 190 of the NPPF is triggered which says:

'When considering applications for development within National Parks, the Broads and National Landscapes, permission should be refused for major development⁶⁷ other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;

the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and

any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated '

8. The primary consideration for this speculative development is one of landscape impact and village capacity given Sedlescombe sits within the HWNL.
9. Below is the extract from the Rother District Council Local Development Framework Core Strategy: Market Towns and Villages Landscape Assessment August 2009.

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	parkland	x	canal - ditches
settlement (ribbon)	arable	scrub	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
ENCLOSURE:	confined	enclosed in gardens		open	x
TEXTURE:	smooth	textured	x	rough	very rough
COLOUR:	monochrome	muted	x	colourful	garish
DIVERSITY:	uniform	simple		diverse	x
MOVEMENT:	remote	vacant		peaceful	x
UNITY:	unified	interrupted		fragmented	chaotic
FORM:	straight	angular		curved	x
SECURITY:	comfortable	safe	x	unsettling	threatening
STIMULUS:	boring	bland		interesting	x
PLEASURE:	offensive	unpleasant		pleasant	x

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.

10. The conclusion of this study was that ***‘Development would not be acceptable beyond the development boundary’***

11. The site was again considered in the Local Authority’s SHLAA 2013 which forms the basis for allocated sites within the current local plan. Here is the extract from the SHLAA:

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)

12. The conclusion of the policy officers at Rother was that this site was ‘**Not Suitable**’ for development.

13. The more recent HELAA Land assessment notes the following in the below table:

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.

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

14. It is clear that no assessment by Rother and East Sussex County Council policy officers from 2009 to 2022 when the HELAA was first produced that the land being proposed is suitable for development. Nothing has changed in relation to this land or the adjoining boundary or houses during this period. **Simply if the landscape considerations were unacceptable at those assessment points and nothing has changed in terms of landscape then policy consistency says that the same land should still be unacceptable for development, and the proposed development should be refused on landscape reasons alone.**

15. Furthermore, the proposed development cannot be said to enhance the HW NL and should be refused on that basis as it conflicts with paragraphs 189 and 190 of the NPPF and Paragraph 85 of the Crow act which says:

‘In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty [F2in Wales], a relevant authority shall have

regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty’.

16. Turning to the supply of housing in Sedlescombe. The District Councils current requirement for housing in Sedlescombe as set out in the Local Plan is for 35 houses. The SNP allocated sites for between 36 and 39 houses plus additional sites with unidentified housing numbers (Policy 6. St Johns the Baptist Church). The table below shows the number of houses currently approved or at different stages of approval.

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	

1. Sedlescombe should be treated as a Category C village where Policy OSS1 at iii (c) states limited growth is to be facilitated in villages with a range of services. This is because Sedlescombe village that has a settlement boundary and some services, albeit of a limited range, which includes a village hall, church, recreation ground, and bus service. (See Figure 9 of the CS Appeal Decision APP/U1430/W/21/3283287 <https://www.gov.uk/planning-inspectorate>)
2. It is clear from the above table that Sedlescombe has overdelivered on the housing requirement by double the LPA’s allocation. Whilst growth is expected in the HWNL growth is and always has been expected to be limited and modest to ensure limited impact on the HWNL. Therefore, the proposed development is unnecessary and would be in conflict with Policy OSS1 of the CS as it would add a significant 33% to the village allocation which has already been exceeded by 100%.
3. In light of this the need to protect the HWNL clearly outweighs the need for the additional housing by this proposed speculative development.

Access

4. As an access only application clearly it is key to establish if the current access is acceptable. During the SNP process this site was assessed by the Highways officer. That officer's assessment was that the access was unacceptable. During 2024 the Clerk and Chair of the Parish met with the same Highways officer to look at the same access who at that time decided the access was potentially acceptable. We consider this inconsistency in assessment to be unacceptable as like the landscape issue an access cannot be assessed to be unacceptable and then the same access with no change be assessed to be acceptable. The current access even if expanded to the land in the ownership of the developer would have a number of issues. There are three steep drives which enter the proposed new access. Clearly this is a problem which is obvious even to the layman. The proposed access would share a popular right of way which is dangerous. This section (as is the whole of Gorselands) is very narrow with very limited off-street parking. The proposed development would add another 22 vehicles using a very narrow lane. This development would feed into Brede Lane which already has traffic issues related due to the combined proximity of the village car park, school, pub and hotel in addition to the approved development at 'The Paddock'- RR/2022/2619/P for 21 houses. The entrance for this development is just opposite and adjacent to Gorselands. The result being that this section of Brede Lane which has poor visibility to the left coming out of Gorselands would be subject to vehicles from an additional 33 houses.

Water run-off from the access.

20. The applicant has failed to address the well-known water run off problem from this field down the existing access. During heavy rain significant levels of water runs from the field down onto Gorselands. The proposed new development would significantly exacerbate the volume of water because of the addition of the hard surface roadway. As this is an access only application the applicant should submit a surface water assessment and plan as to how surface water could or would be managed as the water from the development flows onto Gorselands.
21. The application has not provided a sequential flood risk assessment as required by Paragraph 172 of the NPPF which says:

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

Also see: **Appeal Ref: APP/U1430/W/21/3283287**

Access Ownership

22. It is understood that the applicant does own parts of the verge coming from the field to Gorselands. However, it can be seen that the residents of 45,47 and 30 Gorselands have used and developed the verge for parking including the creation of a hard surface parking area and may have gained private rights as a result. Whilst this may not be a planning matter the exact area owned by the applicant should be confirmed and how the rights of these properties may potentially compromise the access. This needs to be established before permission for development is established. Note: at the writing of this response the RDC planning portal for this application is not working but it appears no detailed drawings have been submitted for the access and how the issues of the steep drive entrances of 45,47 and 30 will be accommodated to create safe entry and exit for those properties which will now have vehicles passing in front of their drives or how the footpath will be integrated into the access or the downward incline to Gorselands onto a turning circle will be made safe.

Additional comments regarding the site and its location and the proposed development.

23. **Footpaths.** The proposed development has an existing well used footpath Sed 4/1 running through its centre. The development will be clearly visible to both the left and right of the footpath. It is clearly established by appeal inspector's decisions that developments should not be easily visible from public rights of way. In addition, the proposed development would be highly visible from footpath Sed 5/2 which sits at a higher elevated position to Sed 4/1 approximately 220m to the west looking down on the proposed site. These footpaths form a part of a popular local circular walk. In addition, the development proposes moving footpath SED 4/1 to allow for garden in the proposed plot 4 and 5. This is fundamentally unacceptable as it conflicts with recently enhanced requirement of Section 85 of the Crow Act which says:

'(1)In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty [F2in Wales], a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty'.

23. The Parish Council acknowledges that this is an outline application for access with all matters reserved. However, it is accepted that a detailed layout provided which is the developers 2nd submission sets out an expected number and layout of houses. As such it is key to make the following comments in relation to the concept proposed plan.

a) The layout of the development is haphazard being split into two parts. The part to the North follows the ridge line which sits incongruously in the field. The

second part which sits in a 'nook' in the south part of the field requires a long drive from the access road cutting through the field edge to enter the development (and partly encircling the adjacent existing property in Gorselands). The whole development does not form a natural extension to the existing Gorselands development pattern but simply tries to fit 11 houses where it can. This does not enhance the settlement or the countryside.

- b) The house in Plot 8 overlooks existing properties in Gorselands as this plot is a two-story house compared to the majority which are on story.
 - c) The BNG calculation shows only a circa 3% BNG against a requirement of 10%. The applicant has not addressed how the 10% gain will be achieved. It would be wrong to establish permission for development of the site through an access only application without a clear understanding of how the 10% could be achieved.
 - d) It is understood that there is significant Badger activity on the site particularly in the area of the proposed plots 6-11. A full study should be required at this stage to establish if Badger sets will be affected by the proposed development before any permission is given as they are a protected species.
 - e) Gorselands suffers from extremely low water pressure which reaches near zero level in the peak demand period. This has been reported to the Water Authority. Without a new main to the whole of Gorselands any new housing will not have water pressure and will reduce the already very low water pressure to existing properties in this road. The issue has been reported by residents to the Water Authority with no material action being taken. Prior to any application being approved confirmation should be gained from the Water Authority and the developer that new mains will be installed to resolve any water pressure issues or if the Water Authority cannot support a new water supply, then the application should be refused.
 - f) The proposed layout only shows 6 defined parking spaces with two areas identified as bins & parking. The latest ESCC parking calculator (attached) shows that with the suggested numbers of houses and bedrooms there would need to be 24 spaces on site. This is relevant as even though this is an access only applications it is clear that there is no further room available to add the additional spaces unless there is further encroachment into the field which in turn would both negatively affect the already low BNG calculation and further damage the HWNL.
24. We are also aware that as at 9 October 2025 no pink notice had been placed on the site and no residents' comments had been uploaded to the RDC website

planning portal. We would ask that the consultation period be extended to adjust for these issues.

Summary

25. The applicant has not provided sufficient details as to how the access would be achieved given the proximity to the existing houses and footpath edging the access, which was previously rejected by Highways officers nor have, they conducted a sequential flooding test due to the large volume of water runoff from the existing field which would be exacerbated by the development. (note this field was originally the water source for the village)
26. The proposed layout, whilst not final is poorly laid out requiring a long drive to be created across grassland to service a number of the houses and a footpath to be redirected. The layout is haphazard and does not form a natural extension to the adjacent development of Gorselands.
27. The proposed development would be in conflict with CS policies RA1, RA2, RA3, OSS1, OSS2, OSS3, OSS4 and EN1 in that the development is not required to meet and already exceeded housing target for Sedlescombe village and go well beyond the limited development required in the village and that the proposed development would damage not enhance the HWNL. In addition, due to the lack of housing supply the development would still be in conflict with Para189 and 190 of the NPPF and paragraph 85 of the CROW act as it would cause harm and not enhance the HWNL on land which has already been assessed as not suitable for development due to the impact on the landscape.

Sedlescombe Parish Council
10/10/2025

Sedlescombe Parish Council submission in relation to Planning Application **RR/2025/1121/P** Land North of Gorselands, Gorselands, Sedlescombe. Outline application for construction of 11 dwellings, gardens, parking and access road, including improved access road from Gorselands all matters reserved except access.

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12. The conclusion of the policy officers at Rother was that this site was ‘**Not Suitable**’ for development.

13. The more recent HELAA Land assessment notes the following in the below table:

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.

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

14. It is clear that no assessment by Rother and East Sussex County Council policy officers from 2009 to 2022 when the HELAA was first produced that the land being proposed is suitable for development. Nothing has changed in relation to this land or the adjoining boundary or houses during this period. **Simply if the landscape considerations were unacceptable at those assessment points and nothing has changed in terms of landscape then policy consistency says that the same land should still be unacceptable for development, and the proposed development should be refused on landscape reasons alone.**

15. Furthermore, the proposed development cannot be said to enhance the HW NL and should be refused on that basis as it conflicts with paragraphs 189 and 190 of the NPPF and Paragraph 85 of the Crow act which says:

‘In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty [F2in Wales], a relevant authority shall have

regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty’.

16. Turning to the supply of housing in Sedlescombe. The District Councils current requirement for housing in Sedlescombe as set out in the Local Plan is for 35 houses. The SNP allocated sites for between 36 and 39 houses plus additional sites with unidentified housing numbers (Policy 6. St Johns the Baptist Church). The table below shows the number of houses currently approved or at different stages of approval.

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	

1. Sedlescombe should be treated as a Category C village where Policy OSS1 at iii (c) states limited growth is to be facilitated in villages with a range of services. This is because Sedlescombe village that has a settlement boundary and some services, albeit of a limited range, which includes a village hall, church, recreation ground, and bus service. (See Figure 9 of the CS Appeal Decision APP/U1430/W/21/3283287 <https://www.gov.uk/planning-inspectorate>)
2. It is clear from the above table that Sedlescombe has overdelivered on the housing requirement by double the LPA’s allocation. Whilst growth is expected in the HWNL growth is and always has been expected to be limited and modest to ensure limited impact on the HWNL. Therefore, the proposed development is unnecessary and would be in conflict with Policy OSS1 of the CS as it would add a significant 33% to the village allocation which has already been exceeded by 100%.
3. In light of this the need to protect the HWNL clearly outweighs the need for the additional housing by this proposed speculative development.

Access

4. As an access only application clearly it is key to establish if the current access is acceptable. During the SNP process this site was assessed by the Highways officer. That officer's assessment was that the access was unacceptable. During 2024 the Clerk and Chair of the Parish met with the same Highways officer to look at the same access who at that time decided the access was potentially acceptable. We consider this inconsistency in assessment to be unacceptable as like the landscape issue an access cannot be assessed to be unacceptable and then the same access with no change be assessed to be acceptable. The current access even if expanded to the land in the ownership of the developer would have a number of issues. There are three steep drives which enter the proposed new access. Clearly this is a problem which is obvious even to the layman. The proposed access would share a popular right of way which is dangerous. This section (as is the whole of Gorselands) is very narrow with very limited off-street parking. The proposed development would add another 22 vehicles using a very narrow lane. This development would feed into Brede Lane which already has traffic issues related due to the combined proximity of the village car park, school, pub and hotel in addition to the approved development at 'The Paddock'- RR/2022/2619/P for 21 houses. The entrance for this development is just opposite and adjacent to Gorselands. The result being that this section of Brede Lane which has poor visibility to the left coming out of Gorselands would be subject to vehicles from an additional 33 houses.

Water run-off from the access.

20. The applicant has failed to address the well-known water run off problem from this field down the existing access. During heavy rain significant levels of water runs from the field down onto Gorselands. The proposed new development would significantly exacerbate the volume of water because of the addition of the hard surface roadway. As this is an access only application the applicant should submit a surface water assessment and plan as to how surface water could or would be managed as the water from the development flows onto Gorselands.
21. The application has not provided a sequential flood risk assessment as required by Paragraph 172 of the NPPF which says:

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

Also see: **Appeal Ref: APP/U1430/W/21/3283287**

Access Ownership

22. It is understood that the applicant does own parts of the verge coming from the field to Gorselands. However, it can be seen that the residents of 45,47 and 30 Gorselands have used and developed the verge for parking including the creation of a hard surface parking area and may have gained private rights as a result. Whilst this may not be a planning matter the exact area owned by the applicant should be confirmed and how the rights of these properties may potentially compromise the access. This needs to be established before permission for development is established. Note: at the writing of this response the RDC planning portal for this application is not working but it appears no detailed drawings have been submitted for the access and how the issues of the steep drive entrances of 45,47 and 30 will be accommodated to create safe entry and exit for those properties which will now have vehicles passing in front of their drives or how the footpath will be integrated into the access or the downward incline to Gorselands onto a turning circle will be made safe.

Additional comments regarding the site and its location and the proposed development.

23. **Footpaths.** The proposed development has an existing well used footpath Sed 4/1 running through its centre. The development will be clearly visible to both the left and right of the footpath. It is clearly established by appeal inspector's decisions that developments should not be easily visible from public rights of way. In addition, the proposed development would be highly visible from footpath Sed 5/2 which sits at a higher elevated position to Sed 4/1 approximately 220m to the west looking down on the proposed site. These footpaths form a part of a popular local circular walk. In addition, the development proposes moving footpath SED 4/1 to allow for garden in the proposed plot 4 and 5. This is fundamentally unacceptable as it conflicts with recently enhanced requirement of Section 85 of the Crow Act which says:

'(1)In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty [F2in Wales], a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty'.

23. The Parish Council acknowledges that this is an outline application for access with all matters reserved. However, it is accepted that a detailed layout provided which is the developers 2nd submission sets out an expected number and layout of houses. As such it is key to make the following comments in relation to the concept proposed plan.

a) The layout of the development is haphazard being split into two parts. The part to the North follows the ridge line which sits incongruously in the field. The

second part which sits in a 'nook' in the south part of the field requires a long drive from the access road cutting through the field edge to enter the development (and partly encircling the adjacent existing property in Gorselands). The whole development does not form a natural extension to the existing Gorselands development pattern but simply tries to fit 11 houses where it can. This does not enhance the settlement or the countryside.

- b) The house in Plot 8 overlooks existing properties in Gorselands as this plot is a two-story house compared to the majority which are on story.
 - c) The BNG calculation shows only a circa 3% BNG against a requirement of 10%. The applicant has not addressed how the 10% gain will be achieved. It would be wrong to establish permission for development of the site through an access only application without a clear understanding of how the 10% could be achieved.
 - d) It is understood that there is significant Badger activity on the site particularly in the area of the proposed plots 6-11. A full study should be required at this stage to establish if Badger sets will be affected by the proposed development before any permission is given as they are a protected species.
 - e) Gorselands suffers from extremely low water pressure which reaches near zero level in the peak demand period. This has been reported to the Water Authority. Without a new main to the whole of Gorselands any new housing will not have water pressure and will reduce the already very low water pressure to existing properties in this road. The issue has been reported by residents to the Water Authority with no material action being taken. Prior to any application being approved confirmation should be gained from the Water Authority and the developer that new mains will be installed to resolve any water pressure issues or if the Water Authority cannot support a new water supply, then the application should be refused.
 - f) The proposed layout only shows 6 defined parking spaces with two areas identified as bins & parking. The latest ESCC parking calculator (attached) shows that with the suggested numbers of houses and bedrooms there would need to be 24 spaces on site. This is relevant as even though this is an access only applications it is clear that there is no further room available to add the additional spaces unless there is further encroachment into the field which in turn would both negatively affect the already low BNG calculation and further damage the HWNL.
24. We are also aware that as at 9 October 2025 no pink notice had been placed on the site and no residents' comments had been uploaded to the RDC website

planning portal. We would ask that the consultation period be extended to adjust for these issues.

Summary

25. The applicant has not provided sufficient details as to how the access would be achieved given the proximity to the existing houses and footpath edging the access, which was previously rejected by Highways officers nor have, they conducted a sequential flooding test due to the large volume of water runoff from the existing field which would be exacerbated by the development. (note this field was originally the water source for the village)
26. The proposed layout, whilst not final is poorly laid out requiring a long drive to be created across grassland to service a number of the houses and a footpath to be redirected. The layout is haphazard and does not form a natural extension to the adjacent development of Gorselands.
27. The proposed development would be in conflict with CS policies RA1, RA2, RA3, OSS1, OSS2, OSS3, OSS4 and EN1 in that the development is not required to meet and already exceeded housing target for Sedlescombe village and go well beyond the limited development required in the village and that the proposed development would damage not enhance the HWNL. In addition, due to the lack of housing supply the development would still be in conflict with Para189 and 190 of the NPPF and paragraph 85 of the CROW act as it would cause harm and not enhance the HWNL on land which has already been assessed as not suitable for development due to the impact on the landscape.

Sedlescombe Parish Council
10/10/2025