

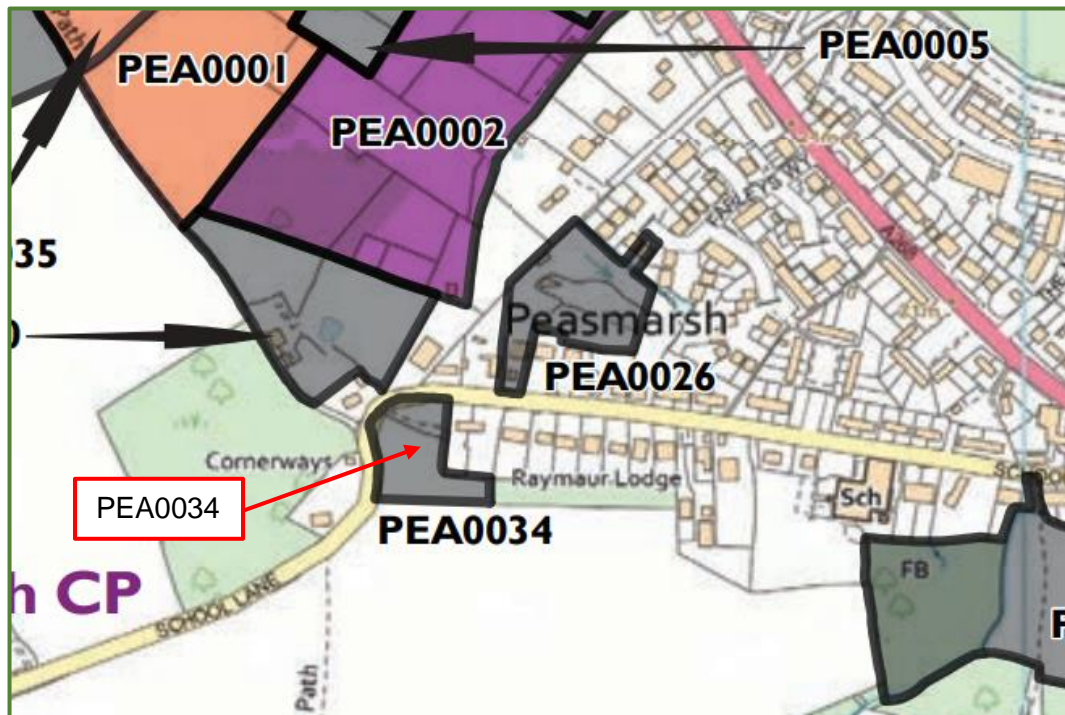
Rother District Council  
Planning Policy Department  
Town Hall  
London Road  
Bexhill-on-Sea  
TN39 3JX

July 2024

**Rother Draft Local Plan Regulation 18 Consultation  
Support for Site PEA0034 – Land adjacent to Cornerways, School Lane,  
Peasmarsch**

**1) Introduction**

- 1.1 This representation statement supports a site which has been recently assessed by Rother District Council within the Housing and Economic Land Availability Assessment (April 2024). This forms key background evidence forming part of the draft Rother Local Plan (2020 – 2040) consultation.
- 1.2 The Site is known as ‘Land adjacent to Cornerways, School Lane, Peasmarsch’ (site ID PEA0034). This is referenced to as ‘The Site’ throughout this document. The Assessment Map for Peasmarsch and the Site Assessment Sheet for Site ID PEA0034 from the HELAA are reproduced in **Appendix 1**.
- 1.3 An extract from Assessment Map 4.9 showing The Site’s location is provided below;



- 1.4 The Council's assessment of Site ID PEA0034 in the HELAA is provided below;

*The site forms part of a field at the western end of ribbon development on School Hill. It is an exposed and elevated site which has a strong rural character. Development here at the scale considered through the HELAA would have an urbanising impact and would harm the landscape and character of the High Weald National Landscape. There are also access and drainage constraints.*

- 1.5 As such, the site was not considered suitable for a site allocation as part of this exercise.

- 1.6 This representation statement seeks to address these concerns and promote the site for up to 7 dwellings. Importantly, there is a key difference between the site previously assessed and The Site being promoted as part of this representation, as The Site would now include additional land to the east of the site which is occupied by 2no. semi-detached dwellings, known as Nos. 1 and 2 Hilltop. It is considered that the expansion of the site to include two existing dwellings would enable a scheme to be delivered with significantly reduced landscape impact, which was the main reason behind the site being considered unsuitable for residential development in the recent HELAA Assessment.

- 1.7 The case for The Site being allocated for minor housing development is outlined in the following section.

## **2) Grounds of The Site being allocated for housing development**

- 2.1 It is considered that The Site is available, achievable and deliverable for up to 7 dwellings and this section sets out the material planning policy and other considerations in favour of The Site being a draft site allocation at the next stage of the draft Local Plan.

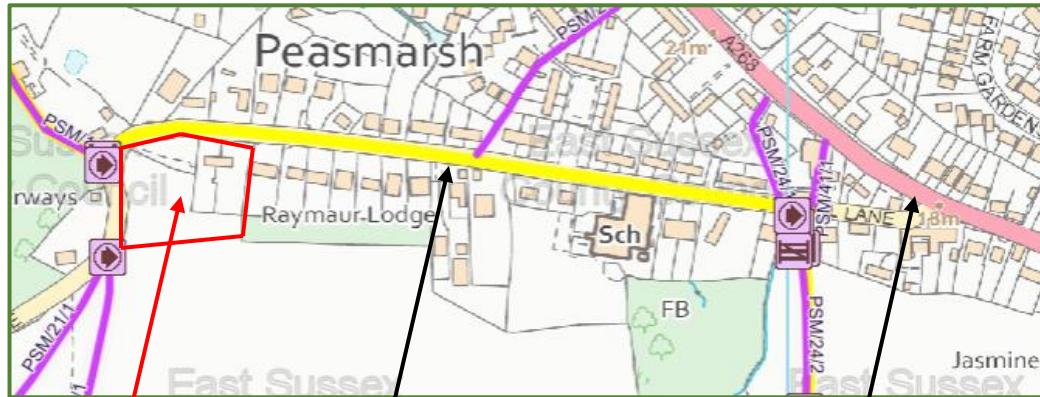
### **i) Sustainable relationship to the village**

- 2.2 The Site relates well to the existing ribbon of development along School Lane in the southern part of Peasmarsh. There is established residential development on the opposite (northern) side of the road and also to the east, on the southern side of the road.

- 2.3 The Site links directly to public rights of way which in turn link to all services and amenities in the village, as shown by the extract from the East Sussex Public Rights of Way Map overleaf. Firstly, School Lane is classified as a 'Promoted Path' forming part of the High Weald Landscape Trail and as such, which it is a vehicular lane, it is promoted for walking. In turn, bus stop links can be reached within a 7 minute walk (0.3 miles) at the junction with School Lane and Main Street to the east.

- 2.4 Furthermore, a pathway on the opposite side of School Lane (PSM/18/3 and in turn PSM/18/2) links directly to the Jempson's Superstore on the western side of the village, which also includes a café and post office. As such, this site occupies a reasonably sustainable village location in the context of Peasmarsh.

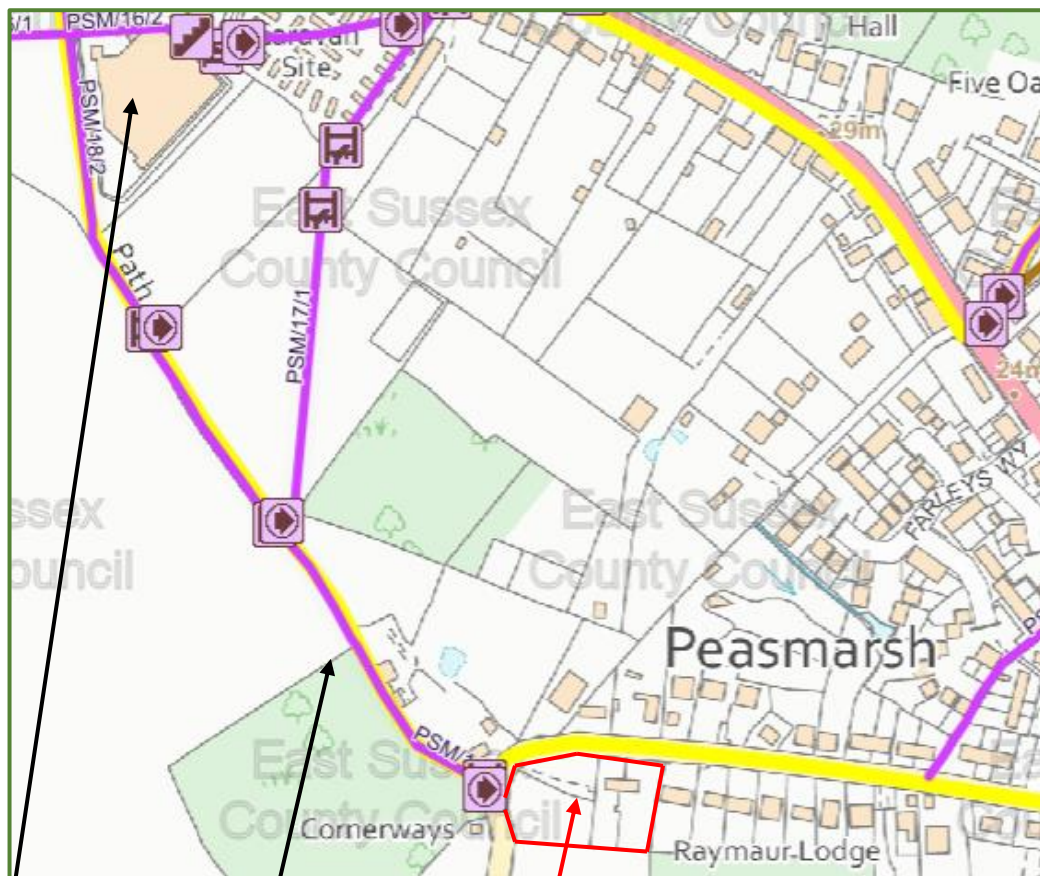
Extracts from East Sussex Public Rights of Way Map



PEA0034

Promoted Path

Bus stops



Jempson's  
Superstore

Public rights of  
way

PEA0034

2.5 As such, while future residents would have some reliance on the private car, there are various options to reach local services and amenities by alternative transport modes, including walking and cycling. As such, this is a reasonably sustainable village location.

2.6 Furthermore, The Site was recently assessed for a potential housing allocation in the Peasmarsh Neighbourhood Plan (albeit excluding 1 and 2 Hilltop). Although The Site was not allocated, only one small site was allocated (for up to five dwellings) in the Plan. Indeed, The Site was an 'identified site' which is considered suitable to deliver up to 7 dwellings. The detailed site assessment is reproduced in **Appendix 2**. In summary, this assessment stated that;

*The site is considered suitable for development with 7 dwellings provided that access is acceptable to the highway authority. In the last two years there was a vehicle collision at this location when a vehicle exiting from the site was hit by a car coming up School Lane.*

*There are several issues to be addressed with the Cornerways site : the landscape impact, access and sewage disposal being some of them.*

*There is an approximately 15 m wide band of trees behind six of the houses on School Lane. Extending that westwards along the southern boundary of the site using native species would shield the greater landscape from any development. There is also a vintage oak tree either on the site or next to it. That must be protected and included in the site landscape proposals.*

*Access to the site on a bend in School Lane is potentially a serious problem as sightlines will be limited. This is a matter for the ESCC highways team which has set out how any potential developer would start to discuss the issue with the team.*

*The site is approximately 110 metres beyond but above the end of the foul water sewer in School Lane as shown on the SW official map. Whilst an inconvenience, this is not seen as an unsurmountable problem.*

2.7 As such, The Site was considered 'suitable for development with 7 dwellings', so long as it can be demonstrated that the scheme would be acceptable in terms of landscape impact, access and drainage in particular. These are considered in the remainder of this statement.

**ii) Landscape impact**

2.8 The Site lies within the High Weald National Landscape, which washes over this part of Rother District.

2.9 The Site is contained by established boundary hedgerows and trees along the School Lane frontage, with the existing residential development to the east. To the south east is a tree belt.

- 2.10 In order to be in keeping with the street scene and to minimise landscape impact, it is proposed that the new houses would be in a linear form at the front (north) of The Site. The existing access would be retained ensuring that the boundary hedgerow would be largely unaffected. The rear part of the site would be retained as open space and as a landscape and ecology buffer from the more open land beyond the southern boundary of the site. An indicative site layout plan is provided below and in **Appendix 3**.

**Illustrative site layout for the site**



- 2.11 The above drawing indicates an illustrative scheme comprising 5no. 2 bedroom and 1no. 4 bedroom. The existing access would be reused (and upgraded to meet visibility requirements), with the boundary hedgerows being largely retained, with an additional buffer adjacent to the northern boundary. There would be a variety of car parking types, with native boundary hedgerows to the front, between and to the rear of the plots which is supported in the High Weald Housing Design Guide. The land to the rear of the site would be retained as open space, together with landscape and ecological enhancements.

- 2.12 Please note that this scheme is purely indicative and a higher density scheme comprising entirely 1 and 2 bedroom dwellings (which is supported by the Peasmarch Neighbourhood Plan) could be delivered to secure a net gain of at least five dwellings.
- 2.13 The above scheme has taken account of views from the public right of way to the south west of the site, running south from School Lane. The two dwellings in the photograph would be replaced, with the additional housing being to the west of this. The land to the rear (and closest to the right of way) would be retained as the open space.

**View from the public right of way looking towards The Site to the north east**



- 2.14 As such, it is considered that the visual impact can be satisfactorily mitigated through the scheme design and site layout and also the proposed landscape planting, with any harm being outweighed by the delivery of lower cost housing which is affordable for local residents.

**iii) Affordable housing**

- 2.15 The scheme would trigger affordable housing amounting to 40% of the scheme, resulting in benefits for the local community.

**iv) Neighbouring amenity**

- 2.16 There is one neighbouring dwelling to the east of the site. However, given the presence of 1 and 2 Hilltop, there would be little to no change following their demolition and replacement, in terms of impact upon neighbouring amenity. The proposed access would not result in any harm from noise and disturbance.

**v) Access**

- 2.17 It is proposed that the existing site access serving 1 and 2 Hilltop would be retained and reused to serve the proposed development. This access would be improved to secure the required visibility in both directions, with this being a slow moving countryside lane. Any loss of hedgerow can be replaced within the site, behind the visibility splay lines.

**vi) Drainage**

- 2.18 The HELAA states that there are access and drainage concerns. The Site lies within Flood Zone 1 and there is no risk from surface water run-off on The Site. Regarding foul drainage, it is considered that the small-scale nature of The Site and the extent of the retained land means that this can be treated on-site.

**vii) Other matters**

- 2.19 It is considered that all existing trees on and adjacent to the site can be retained.
- 2.20 The Site is of sufficient size to deliver the scheme while also delivering biodiversity net gain. As referenced, the southern part of the site (together with the front part of The Site) would be retained as a landscape buffer with biodiversity improvements.

**3) Summary**

- 3.1 Overall, The Site is available, achievable and deliverable for up to 7 affordable dwellings.
- 3.2 The Site is well-related to the village and is within walking distance of bus stops and other village amenities. The Site is contained by established housing and natural boundary features to the north, east and west, with the southern part of any proposed scheme being retained as public open space and for landscape and ecological buffers.
- 3.3 There would be no harmful impact upon residential amenity and any other planning constraints can be mitigated.
- 3.4 Overall, for the reasons stated The Site should be taken forward as a draft site allocation for up to 7 dwellings at the next draft Local Plan stage.



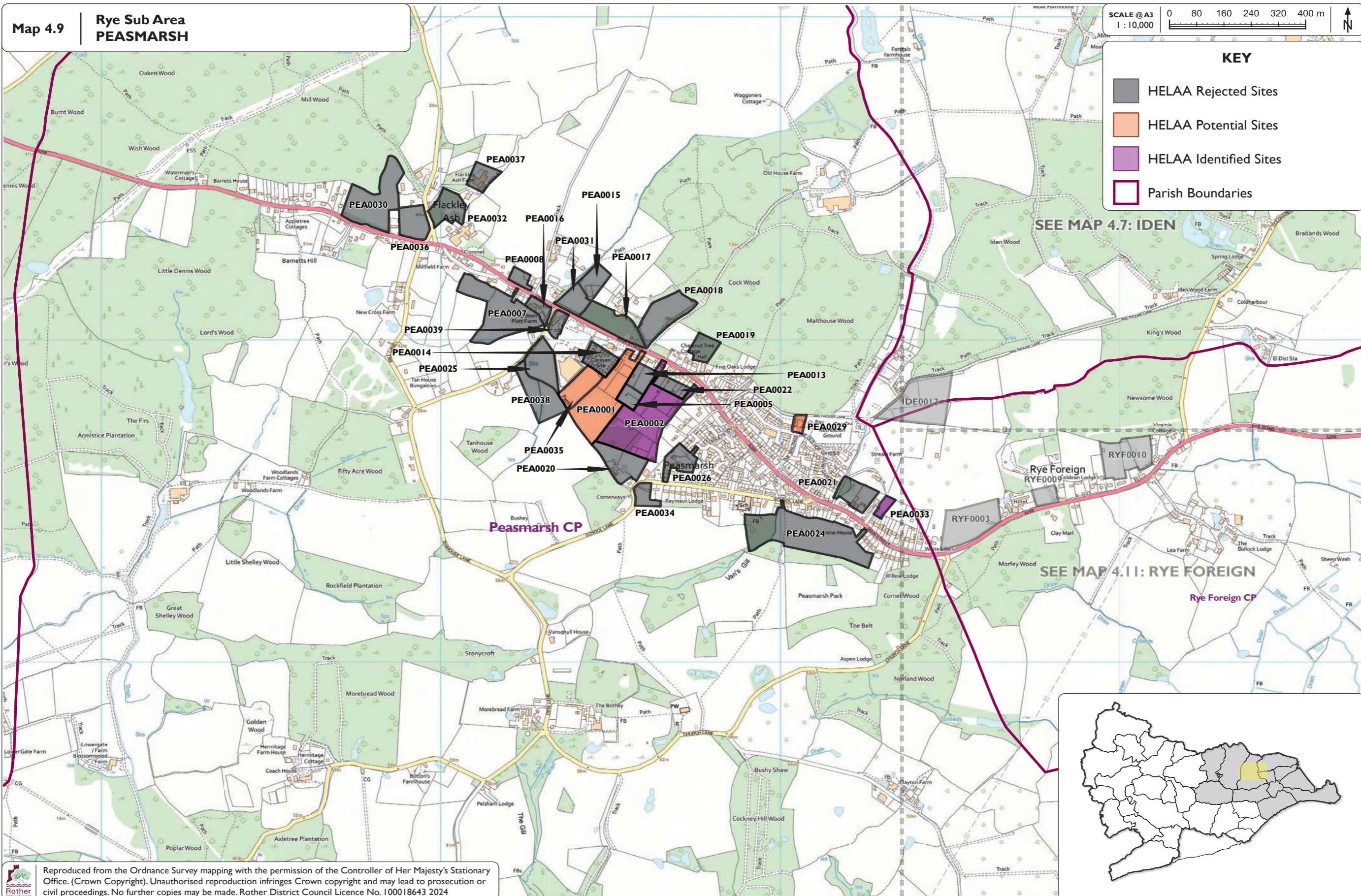


Map 4.9 | Rye Sub Area PEASMARSH

SCALE @ A3  
1 : 10,000

**KEY**

- HELAA Rejected Sites
- HELAA Potential Sites
- HELAA Identified Sites
- Parish Boundaries



SEE MAP 4.7: IDEN

SEE MAP 4.11: RYE FOREIGN

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Site ID	Site Address	Site size (hectares)	Summary of Environmental Constraints	Site Identification	Site Assessment	Availability
PEA0031	Land west of Woodside, Main Street, Peasmarsh	0.57	The site is within the High Weald National Landscape. Adjacent to deciduous woodland Priority Habitat. Areas at risk of surface water flooding. Largely within an Archaeological Notification Area. A listed building nearby. Public right of way on boundary.	Considered through the Neighbourhood Plan	This is a small, relatively enclosed site on the northern side of Main Street, directly opposite the junction with Tanhouse Lane, which leads to the Jempsons supermarket and petrol station. Development here at the scale considered through the HELAA would change the rural character of this edge of the village location, where denser forms of development are largely confined to the southern side of Main Street. In particular, a new access to serve a development would break through a prominent tree line, requiring significant loss of the woodland screening of the site in order to achieve the necessary visibility splays. Achieving a safe vehicular access, bearing in mind the location of the Tanhouse Lane junction, could also be problematic, and while a roundabout or signalised junction could be considered, this is unlikely to be viable given the small size of the site. There could also be an adverse effect on the parkland setting of adjacent listed buildings, including the Grade II* listed Woodside.	Potentially available
PEA0032	Land north of Flackley Ash Hotel, Mackerel Hill, Peasmarsh	0.82	The site is within the High Weald National Landscape. Adjacent to an Archaeological Notification Area. Listed Building nearby.	Considered through the Neighbourhood Plan	This is an enclosed site within the small settlement of Flackley Ash, west of Peasmarsh village. It is accessed via a narrow rural lane with no footways, and there is no direct access to footways on Main Street (as there is only a footway on the opposite side of Main Street at this location). These factors, together with its distance to services and facilities in Peasmarsh, mean it is not considered a sustainable location for additional residential development at the scale considered through the HELAA because new residents would be largely car-reliant for most journeys. Furthermore, development here could adversely impact on the setting of two listed buildings, including the Grade II* listed Flackley Ash Hotel, and on mature trees.	Potentially available
PEA0034	Land adjacent to Cornerways, School Lane, Peasmarsh	0.37	The site is within the High Weald National Landscape. There is an area of ancient woodland just to the east.	Considered through the Neighbourhood Plan	The site forms part of a field at the western end of ribbon development on School Hill. It is an exposed and elevated site which has a strong rural character. Development here at the scale considered through the HELAA would have an urbanising impact and would harm the landscape and character of the High Weald National Landscape. There are also access and drainage constraints.	Potentially available
PEA0036	Land west of Mackerel Hill, Flackley Ash	0.79	The site is within the High Weald National Landscape. Partly within an Archaeological Notification Area. Listed Buildings nearby.	Considered through the Neighbourhood Plan	The site is a small field to the north of the A268 that forms part of a medieval assart field network interspersed with sporadic residential development. As such, it constitutes an important and characteristic undeveloped open gap in the settlement of Flackley Ash, and is integral to the settlement's rural context. The site's development at the scale considered through the HELAA would impact on the landscape and character of the High Weald National Landscape and the rural setting of the settlement.	Unknown
PEA0037	Land east of Mackerel Hill, Flackley Ash	0.51	The site is within the High Weald National Landscape. There is a traditional orchard Priority Habitat adjacent to the western boundary. There is a Historic Field Boundary to the east.	Considered through the Neighbourhood Plan	This is a small, isolated site located within the countryside to the north of Flackley Ash, currently occupied by agricultural barns. The site does not relate well to the existing development pattern and is poorly located in relation to services in Peasmarsh, and it has no footway connection to the village. Access is a further constraint.	Unknown



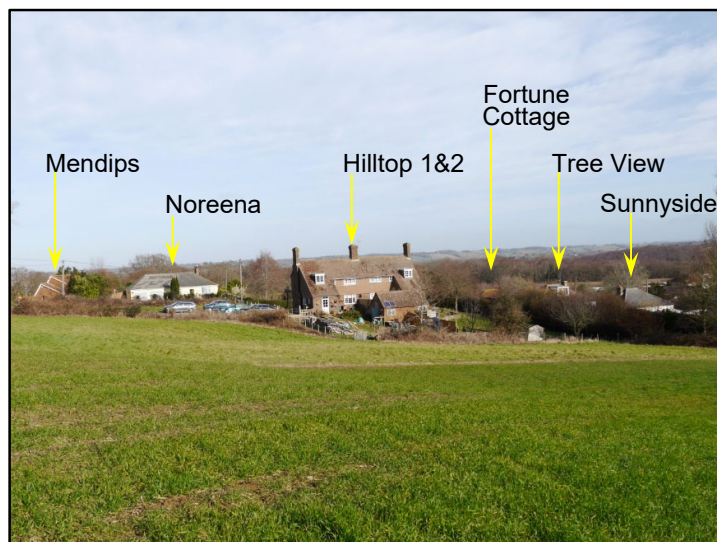
## Referendum Draft

### 2.3 PEA L01 Cornerways

The Cornerways site is at the top of the School Lane hill opposite The Mount, where the road turns south. It is on the south side of the lane and is the land where the residents of Hilltop currently park their cars. The site is adjacent to the development boundary and the built-up area. It is less than 300 metres from the school and less than 500 metres from the Jempson’s campus.

The site is in Zone P3 of the 2009 Landscape Assessment in contrast to the north side of School Lane which is in Zone P2. P3 was rated as of moderate to high visual and character sensitivity with low capability to accept change for housing with low potential to mitigate. Being adjacent to existing housing the site is of moderate sensitivity with some capability to accept change and some potential to mitigate.

On the other hand the site [paler green on the right] is exposed to the greater landscape when viewed from the two footpaths which cross Retford Field relatively close to the site, albeit a view with an urban feel thanks to the houses on School Lane. RDC describe the site as having a strong rural character but that depends on the point and direction of view.



*The site viewed from PRoW PSM/22/1*

There are no designated heritage assets in the area although The Mount, dating from before 1840 as it shows on the tithe map, should be classed as a non-designated asset.

The site is considered suitable for development with 7 dwellings provided that access is acceptable to the highway authority. In the last two years there was a vehicle collision at this location when a vehicle exiting from the site was hit by a car coming up School Lane.

There are several issues to be addressed with the Cornerways site : the landscape impact, access and sewage disposal being some of them.

There is an approximately 15 m wide band of trees behind six of the houses on School Lane. Extending that westwards along the southern boundary of the site using native species would shield the greater landscape from any development. There is also a vintage oak tree either on the site or next to it. That must be protected and included in the site landscape proposals.

Access to the site on a bend in School Lane is potentially a serious problem as sightlines will be limited. This is a matter for the ESCC highways team which has set out how any potential developer would start to discuss the issue with the team.

The site is approximately 110 metres beyond but above the end of the foul water sewer in School Lane as shown on the SW official map. Whilst an inconvenience, this is not seen as an unsurmountable problem.

## Referendum Draft



This particular site was submitted to RDC at a very late stage so was not assessed in the SOA. Instead, the PNDP group undertook an assessment based on the same methodology as the SOA work. Before the design moves forward for any proposed development there should be an independent assessment undertaken, possibly by AECOM, to verify or otherwise the findings of the PSA.

### 2.3 Other Potential Sites

There are two sites which are potentially suitable for development in the longer term. Neither currently has an acceptable means of vehicular access but that might be solved over the life of the Plan, particularly as the sites are adjacent to each other. They are included in the Plan should any of the other sites not be developable, not as additional sites.

#### *PEA01 : Oaklands*

Oaklands, behind and including the house of that name immediately east of the Cock Inn, is one of two potential development sites on the remaining paddocks in the core of Peasmarsh village. It adjoins the Pippins site which was designated for development in Rother's 2019 DaSA.

The site is adjacent to the existing development boundary which could be extended to include the site. It is also at the west end of the village which is Rother's preferred area for future development of the village. Further, it is in Zone P2 of the 2009 Landscape Assessment which was rated as of low visual and character sensitivity with moderate capability to accept change for housing, albeit with moderate to low potential to mitigate the impact of such changes.

What complicates the issue is that the site is exposed to the greater landscape of the AONB and the HWLT passes along the south west edge of the field which is, at that point, bounded by Zone P3 rated as of moderate to high visual and character sensitivity with low capability to accept change for housing with low potential to mitigate. That means that the site is somewhere between a P2 and a P3 assessment.

This was recognised by AECOM in the SOA and limited any possible development to the northern part of the site, well away from the south west edge. This was clarified to mean the land north and east of the fence that runs from approximately TQ 88521 east 22815 north to approximately TQ 88463 east 22857 north.

Another issue related to the AONB is that discussed in Section 7.4 with respect to NPPF 177 and the opinion of South Oxfordshire DC with respect to relative size in determining what constitutes a major project. The site is adjacent to the designated Pippins site and therefore *'would combine to form one much larger site which would then be a major development'*.




The site might be potentially suitable for a housing development of some dwellings once a solution has been found for vehicular access to it. This is unlikely in the short term but possible in the period of the emerging Local Plan to 2039.

The problem with access is that the site does not have full access to the A268. The Register of Title [ESX8571] held by the Land Registry states :

- 2 Notice entered in pursuance of Rule 254 of the Land Registration Rules 1925 on 2 September 1975 that the registered proprietor claims that the land in this title has the benefit of a right of way over the land tinted brown on the filed plan.*



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- NOTES:**
-  2 Beds with carport
  -  4 Bed with carport
  -  Area allocated for BNG - 304sqm



**REVISIONS:**

Rev	Date	Details	Rev By	Chk By



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JOB NUMBER: 03124  
 PROJECT NAME:  
**Cornerways**  
 Peasmarsh

CLIENT:  
 Lord and Lady Devonport

STATUS	SCALE	DATE
PPA	1:500 @ A3	12/07/24

DRAWING NAME:  
 Proposed Site Plan

DRAWING NUMBER:  
 03124\_P\_150

REV:  
 -

**1** Proposed Site Plan

1:500

