

KITEWOOD

Planning Policy
Directorate of Place and Climate Change
Rother District Council
Council Offices
Town Hall
Bexhill-on-Sea
TN39 3JX

Delivered via email only to: draftlocalplan@rother.gov.uk

22nd July 2024

Dear Planning Service

RE: LOCAL PLAN REGULATION 18 CONSULTATION - REPRESENTATIONS IN RELATION TO LAND SOUTH OF MAIN STREET, PEASMARSH (SITE HELAA REF. PEA0001)

Kitewood Estates Limited ('Kitewood') write to provide our comments relating to the:

- *Rother Local Plan 2020 – 2040 Draft (Regulation 18) Version (April 2024)*

Kitewood is a privately owned development company, and we specialise in delivering high quality developments in London and the South of England. Kitewood control the above site and therefore it is available and deliverable for residential development within the short term (i.e. the first 5 years of the plan period).

Kitewood has commenced pre-application discussions in relation to this site and the first pre-application meeting is scheduled to take place on the 1st August 2024. A Planning Performance Agreement (PPA) is expected to be agreed thereafter. We look forward to continuing positive pre-application engagement with the Council and key stakeholders.

This submission comprises this letter and the following documents:

- Landscape Led Strategy Document, prepared by Pegasus Group; and,
- Draft Site Plan (submitted for pre-application discussions), prepared by HP Architecture

The representation seeks to promote the allocation of site referenced PEA0001 in the Council's Draft Housing and Employment Land Availability Assessment (HELAA). The site is shown on the HELAA map for Peasmarsh and the site assessment is available in the Part 2, Site Assessments within the Rye and the Eastern Settlements Cluster section. The site is outlined on the enclosed plan, under PEA0001 which is an extract from the Council's Draft HELAA.

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Peasmarsh is located within the Rye Sub Area of the District. Peasmarsh is a large village, as identified on the Rye and the Eastern Settlements Cluster Development Strategy Map (Figure 27 of the Draft Regulation 18 Local Plan).

The draft Regulation 18 Local Plan seeks to distribute growth to all settlements within the Rye Sub Area that is proportionate to scale and sustainability of the existing settlements within the Sub Area.

Peasmarsh is expected to accommodate 97 dwellings over the draft plan period (2020-2040). 50 dwellings have been identified within the adopted Development Plan documents, comprising 45 dwellings at the Pippins site within the Rother Development and Site Allocations (DaSA) document (December 2019), and 5 dwellings at the Orchard Way site within the Made Peasmarsh Neighbourhood Plan (April 2024).

In light of the above, the Draft Regulation 18 Local Plan identifies a potential additional level of housing growth for Peasmarsh of 47 dwellings. It is expected that the Council's Regulation 19 Local Plan would allocate additional sites to meet this need for Peasmarsh.

Kitewood support the Council's Spatial Strategy by seeking to allocate growth to all settlements within the Rye Sub Area that is proportionate to the scale and sustainability of the existing settlement.

The Council's Development Strategy Background Paper that was published alongside the Draft Regulation 18 Local Plan identifies Spatial Development Options (SDO) and SDO1 identifies Village Clusters which has been carried through to the Draft Regulation 18 Local Plan. Peasmarsh is one of the villages within the Rye Village Cluster and a Village Cluster is defined as:

“A cluster of villages that are connected with each other to form a sustainable community. Two clusters identified centred around Rye and Battle as key transport and service hubs.”

Peasmarsh is recognised as one of the more sustainable settlements within the Rye Sub Area and this is reflected by the fact that it is expected to take the most growth behind Rye (the Principal Settlement) within the Sub Area. Peasmarsh is a sustainable settlement and contains a good range of local services and facilities including a village hall, church, two public houses (one provides a takeaway service), recreation ground and the Jempson's Superstore which also contains a pharmacy, a café, and a petrol station.

In light of the above, Peasmarsh is recognised as a 'Medium growth opportunity' within the Draft Regulation 18 Local Plan, which is the second of four tiers, as illustrated below.

Figure 35: Opportunities for housing growth by Parish area

Greater opportunities for growth	Medium growth opportunities	Low growth opportunities	Limited growth opportunities
Battle*	Brede	Beckley	Ashburnham & Penhurst
Bexhill	Burwash*	Camber	Bodiam
Rye*	Catsfield	Crowhurst*	Brightling
Salehurst & Robertsbridge*	Hurst Green*	Etchingham*	Dallington
Ticehurst*	Icklesham	Ewhurst	East Guldeford
Westfield	Peasmarsch*	Fairlight	Mountfield
	Sedlescombe*	Guestling	Pett
		Iden	Udimore
		Northiam	Whatlington
		Playden	
		Rye Foreign	

*These parishes have either adopted or are preparing Neighbourhood Plans

The site (HELAA ref. PEA001) is well located to the local services and facilities within Peasmarsch and its allocation would be consistent with the existing and prevailing growth of Peasmarsch as a linear / ribbon village. The site immediately east, known as The Pippins site, is allocated within the Council's adopted DaSA (December 2019) for up to 45 dwellings (allocation ref. PEA01). At the Council's Planning Committee meeting on the 18th July 2024, the Committee supported the Officer's recommendation and resolved to grant planning permission (ref. RR/2023/1707/P) subject to the completion of a S.106 Agreement and finalisation of planning conditions. The approved development was for 41 (net 40) dwellings, accessed from Main Street.

The Pippins site establishes an appropriate pattern of growth for Peasmarsch and sets a potential new building line for the southern edge of the village. The Kitewood site would seek to continue this pattern of development and 'tie in' with the development at the Pippins site, whilst responding to the site specific constraints.

The site is located within the High Weald National Landscape (formerly AONB) which is the primary constraint to development for this site. The site is located within the central part of Peasmarsch which is defined by enclosed paddocks to the rear of the existing development that fronts onto Main Street. The Council's Settlement Study – Part 2 background paper, that was published alongside the Draft Regulation 18 Local Plan states the following in relation to the central part of the village:

"P2 – Central Paddocks

This is the central part of the village on either side of Main Street. As well as the built-up area, it is characterised by enclosed paddocks which extend out beyond the gardens of the residential development. The paddocks are generally enclosed by tall well treed hedgerows. Weatherboard cottages are local features.

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The landscape, although within the wider high value AONB, is of fair quality, with low character sensitivity and low visual sensitivity. There is consequently a 'moderate' capacity for residential development and 'low' capacity for business development. There would be scope to infill with sensitive development and redefine the village boundaries where they interface with the countryside, and that there may be scope in enclosed paddocks close to the village edge."

Further to the above, the Council's site specific assessment within the draft HELAA identifies:

"The site is a large field divided into paddocks, at the rear of ribbon development fronting Main Street. It is relatively level and enclosed from views from the wider countryside. On its south-eastern boundary the site adjoins land allocated for housing and open space through Policy PEA1 of the DaSA Local Plan, and in principle, the site could be suitable for additional residential development subject to the provision of an appropriate landscape- and open space- buffer on its southern section to screen long views to the south and to tie in with the open space provision in the allocated site to the east. The recent Peasmarsh Neighbourhood Plan Examination recognised the potential of this site to support residential development but at that time an appropriate access from Main Street was unachievable. It now appears that an alternative access point from Main Street could be available. However the Highway Authority has raised initial concern with visibility from the access looking west, and further detailed assessment work would need to be undertaken by the landowner to ascertain whether an acceptable vehicle access and suitable pedestrian and cycle links could be achieved."

In the context of the District-wide constraints, the site is **unconstrained** and located within the central part of the village which is considered the most appropriate location within the village to accommodate residential development. The site is well enclosed and it is expected that any development would seek to retain and enhance the boundary planting whilst seeking to tie in with the existing and emerging development to the north and east of the site.

Access to the site would be provided from Main Street, through the property known as The Garden House which would be demolished to facilitate development of the site. Kitewood would enter into pre-application discussions with the East Sussex Highways Authority at the appropriate time to discuss the access and highways implications of developing the site.

As recognised in the draft HELAA, the Peasmarsh Neighbourhood Plan process assessed the potential development of the site and considered that it would be considered suitable for development subject to appropriate access being provided. At the time the Neighbourhood Plan assessment was carried out, the access would have been provided via the Oaklands property, however, due to the visibility splays to the west, it was not clear if safe access could be provided. The site submitted with this enclosure would provide access 50m to the east, via The Garden House, and therefore we are confident that safe and suitable access is deliverable.

The Council has a 5YHLS position of 3.09 years as identified in the Council's April 2023 Position Statement (published December 2023), which is the most up-to-date verified figure at the time of writing. It is clear that the Council need to take a positive approach to allocating development across the District within sustainable locations to address this shortfall. Kitewood support the Council's spatial development strategy by allocating growth to all settlements within the Rye Sub Area, and specifically 97 dwellings in Peasmarsh which our site could contribute directly towards.

Kitewood intend to bring the site forward for residential development and consider it should be specifically allocated for housing in the Council's Local Plan Review process. The site would be a logical extension to the existing settlement of Peasmarsh, particularly in the context of the recent

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decision by the Council's Planning Committee resolution to grant planning permission on the adjacent Pippins site.

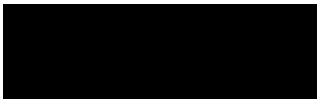
Given the size of the site and the potential scale of development (approximately 30 dwellings), there would be no requirements for significant infrastructure that would delay the delivery of residential development on the site.

The site is unconstrained within the context of Peasmarsh and the District-wide constraints. It is imperative that sustainable allocations are made within the Local Plan Review process given the current housing land supply position. The site is now under the control of a development company and therefore available and deliverable in the short term (i.e. the first 5 years of the plan period). As such, Kitewood request that the site is allocated for residential development.

We look forward to providing more detailed representations on the Council's Regulation 19 Local Plan when it is published for consultation. We support the Council's plan to meet it's own housing need in full and the proposed spatial development strategy to pursue a blend of the spatial development options, including allocating growth to the village clusters centred around Rye.

Should you require any further information, please do not hesitate to contact myself or my colleague Sara Sweeney.

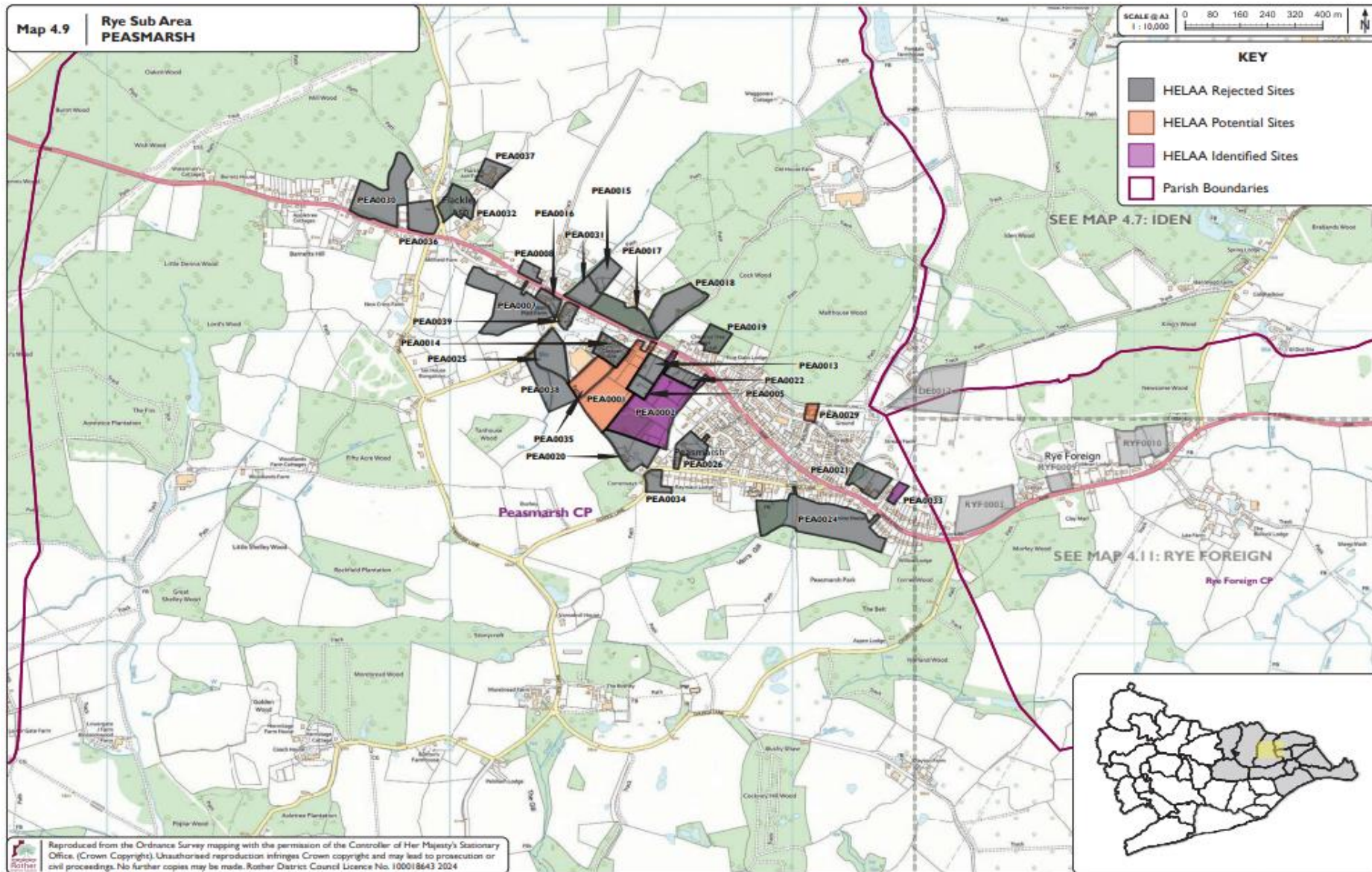
Yours faithfully,



Will de Cani
Planning Manager

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