

Representations to the Rother District Council Local Plan (2020-2040) - Regulation 18 Consultation

On behalf of Kingacre Estates

July 2024

Introduction

1. These representations have been prepared by Nexus Planning on behalf of Kingacre Estates in response to the Regulation 18 consultation of Rother District Council's Local Plan ("the Draft LP").
2. Kingacre Estates has an interest in Land to the south of the Broad Oak Public House, Broad Oak ("the Site") (that is allocated for housing by Policy BRO2 of the Council's Development and Site Allocations Local Plan adopted in December 2019 ("the DaSALP") and, therefore, has an interest in all strategic and non-strategic matters informing the preparation of the Draft LP.
3. The Site is allocated in the adopted Local Plan for 20 dwellings and the northern parcel of land gained planning permission (ref. RR/2018/1813) for 8 dwellings in March 2020. This has now been implemented and completed. The southern part of the Site remains undeveloped but is available for development.
4. These representations specifically respond to Question 66 of the Draft LP - "What are your views on the distribution and opportunities for growth in settlements within the sub-area in figures 25, 26 & 27?"

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5. Paragraph 5.8 of the Draft LP confirms that the most appropriate spatial development options to take forward as Rother's proposed development strategy is a combination of the following options:
 - a. Brownfield intensification and redevelopment within sustainable settlements (Option reference SDO6);
 - b. Bexhill greenfield growth on the northern and western edges of the built-up area of Bexhill to create new compact, connected communities (SDO3A);
 - c. Hastings Fringes urban growth (SDO5);
 - d. Radial settlement network connected to Bexhill and Hastings (SDO2);
 - e. Village clusters centred around Rye and Battle (SDO1); and
 - f. Sustainable settlement growth (SDO4) with longer term, a focus on the A21 Corridor (SDO10).
6. The Development Strategy Background Paper (April 2024) describes option SDO1 (Village Clusters) as a cluster of villages that are connected with each other to form a sustainable community. One of the clusters identified is centred around Rye and includes the village of Broad Oak.
7. The Vision for Rye and the Eastern Settlement Cluster sets out that:

"The eastern cluster of settlements will be better connected by sustainable transport infrastructure, with Rye acting as a key transport hub, and local economies will continue to grow, respecting the historic development

pattern of rural communities over time. The strengthened connections to Rye as a sustainable market town, will allow for sensitive development in adjoining villages.”

8. Section 2 of the Framework considers achieving sustainable development. Paragraph 7 states that:

“The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner.”

9. Paragraph 11 discusses the presumption in favour of sustainable development and states that:

“For plan-making this means that:

- a. all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*
- b. strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses.”*

10. Kingacre Estates support the Council in seeking to address the sustainable longer term strategy for villages in rural locations. It is key to address the need for housing within the rural areas in line with spatial objective 4 of the Draft LP. However, this needs a strategic approach which directs residential development to those villages in close proximity to nearby towns, such as Broad Oak, where sustainable transport options, including bus stops (providing regular services to Robertsbridge, Westfield, Peasmarsh, Mountfield and Battle), and services and facilities such as a primary school, convenience store, bakery and public house are all available. Broad Oak is demonstrably a sustainable location for development.

11. It is clear that in its spatial strategy, the Council has had regard to encouraging development in locations with strong access to key services and facilities and sustainable travel connections, which accords with paragraphs 7 and 11 of the Framework, as well as spatial objectives 1, 7 and 9 of the Draft LP.

12. The Housing and Economic Needs Assessment (February 2024) confirms that the Standard Method calculation results in a minimum Local Housing Need (LHN) figure of 737 dwellings per annum (dpa), which equates to 7,370 dwellings over the Plan Period. As set out elsewhere in our representations, Kingacre Estates considers that for the Draft LP to effectively achieve spatial objective 4, it should explore opportunities to exceed the minimum LHN figure in setting its housing requirement, to more effectively address the issue of affordability within the rural areas and ensure a reliable delivery of housing to meet local needs.

Rye and the Eastern Settlement Cluster – Distribution and Growth Opportunities

13. The Vision for Rye and the Eastern Settlements Cluster within the Draft LP states that the eastern cluster of settlements will be better connected by sustainable transport infrastructure, with Rye acting as a key transport hub, and local economies will continue to grow, respecting the historic development pattern of rural communities over time. The strengthened connections to Rye as a sustainable market town, will allow for sensitive development in adjoining villages.

14. Figure 25 of the Draft LP illustrates the potential development strategy for Rye and the eastern settlements cluster. Specifically, relating to Broad Oak, this sets out the following:

- a. identified level of housing growth – 52 dwellings;
- b. potential additional level of housing growth – 11 dwellings; and
- c. total potential housing growth – 63 dwellings.

15. The Council's Sustainability Appraisal (April 2024) presents an assessment of the available sites in the district for development, and this has informed the Council's overall spatial strategy. It is worth noting that the Site is identified as an available site and scored highest, out of the seven sites located within Broad Oak, against the 20 Sustainability Appraisal Objectives.
16. Kingacre Estates supports the Council in directing strategic development towards sustainable locations within the rural areas, particularly Broad Oak. To further support the Council's Spatial Strategy and housing delivery, and to more effectively achieve spatial objective 4, the Draft LP could explore opportunities to exceed the minimum LHN figure in setting its housing requirement. This would more effectively address the issue of affordability within rural areas and ensure a reliable delivery of housing to meet local needs. As identified above, Broad Oak is a sustainable location within the rural area and Kingacre Estates would suggest that the Council looks to deliver 63 dwellings as an absolute minimum over the Plan Period.
17. Of course, as an absolute minimum, the Council must roll forward existing, currently undeveloped allocations, given that these have already been determined to be sustainable and appropriate through the examination process for the DaSALP (confirmed again in the Sustainability Appraisal accompanying the current consultation). This is essential in any event but will best support spatial objectives 1, 2, 3, 4, 7 and 9 of the Draft LP.

Conclusion

18. Kingacre Estates supports the approach taken by the Draft LP in seeking to deliver strategic development at sustainable settlements in the rural areas. Land to the south of Broad Oak Public House aligns with this strategy and the spatial objectives of the Draft LP as it would:
 - a. Deliver a residential development within a sustainable location within the rural area (in accordance with Draft LP spatial objectives 1, 4 and 7);
 - b. Ensure development is accessible and located within close proximity to sustainable transport (in accordance with spatial objectives 1, 7 and 9);
 - c. Provide housing to meet local needs and address affordability issues (in accordance with spatial objective 4);
 - d. Address the short-term housing needs of Broad Oak as it can come forward quickly and provide a meaningful contribution towards delivering the housing needs of the district (in accordance with spatial objectives 4); and
 - e. Provide an opportunity to deliver a high-quality attractive new development within Broad Oak, which protects and enhances valued and high-quality landscapes (in accordance with spatial objectives 2 and 3).
19. However, Kingacre Estates consider that in order to support the Draft LP's vision and objectives even further, the Council should explore opportunities to exceed the minimum LHN figure.
20. To ensure that suitable and available sites are brought forward, the Council should roll forward unbuilt existing allocations as a minimum, and then look to explore new appropriate allocations.