

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") which is allocated for development 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 67 of the Draft LP - "What are your views on the potential sites identified in the draft HELAA that could accommodate more growth in Rye and the eastern network settlements?"

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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 Spatial Strategy further confirms that the Council will meet the local need for all forms of housing, jobs, facilities and services by strengthening Rother's pattern of development through a landscape-led spatial development strategy that focuses on the 'Live Well Locally' concept.
7. 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.

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 supports 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 more 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 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.
14. Figure 28 of the Draft LP identifies the proposed development sites for the Rye and Eastern Settlements Cluster development strategy. This includes the identification of the Site for 12 units and it is something that we strongly support.
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 against the 20 Sustainability Appraisal Objectives, the Site scored highest out of the seven sites located within Broad Oak.
16. The Site is assessed within the Council’s Draft HELAA (reference: BRE003) and identified to be suitable, available and achievable for development. We wholly agree. It is worth noting that the HELAA states that the Site’s anticipated timescale for development is ‘unknown’ but Kingacre Estates would like to take this opportunity to confirm that subject to appropriate consideration at the development management stage (and in any emerging

site allocation policy) which acknowledges what has happened on the ground in the years since the Site was originally allocated, the Site can come forward without delay i.e. within a 5 year timeframe.

17. Kingacre Estates supports the Council in directing strategic development towards sustainable locations within the rural areas, particularly Broad Oak, and considers that the Site is a suitable location for development as identified by the Council through its previous allocation of the Site and, more recently, within the HELAA and the Sustainability Appraisal. Kingacre Estates urges the Council to roll forward its existing allocation at Broad Oak as a minimum before looking towards new allocations, in order to best support spatial objectives 1, 2, 3, 4, 7 and 9 of the Draft LP.