

Representations in respect of the Regulation 18 Rother Local Plan

1. These representations are made on behalf of Dennis Thomas Builders Ltd and wish to make comments in respect of the overall housing supply and in support of one of the suggested sites in Sedlescombe which our client owns.

Spatial Strategy (Q54 and Q55)

2. The spatial strategy sets out the proposed housing delivery over the plan period and whilst this is still to be confirmed, it is considered this requires a significant uplift to take account of poor delivery rates and previous undersupply of the Core strategy against the previous identified housing needs. It is noted many of the areas and overall supply set out in this plan include previous allocations which are yet to be built out and which sought to meet needs over the previous plan period. Thus, it is considered that new allocations should form the principal part of the overall supply in order that the plan meets future needs as well as addressing the previous undersupply (204 homes per year rather than 737 homes per year).
3. The HEDNA report confirms the housing need for the district up to 2040. The report quotes the Standard Method calculation results in a minimum Local Housing Need (LHN) figure of 737 dwellings per annum (dpa) for Rother. These LHN figures are considerably higher than currently adopted housing requirement policies (335 dpa in Rother and 200 dpa in Hastings). The LHN figures are also higher than recent average rates of delivery in both authorities since 2011/12 (204 dpa in Rother and 170 dpa in Hastings). The HEDNA concludes by stating that the 737 dwellings are the most appropriate figure for housing need.
4. The Spatial Development Strategy seeks to provide between 258-364 homes per year and is thus significantly below the identified housing need set out above. The strategy should be increased closer to the identified needs and which can be achieved through sustainable additions to villages and other communities (in addition to the strategic development at Bexhill) whereby new housing can support local services and public transport. The previous plan also resulted in an undersupply of home against the identified needs. The new plan should therefore be focussing on new allocations and additional homes for the forthcoming plan period.

5. We would support development at Sedlescombe and would support the inclusion of the site at Gorselands (SED0020) which is available, suitable and deliverable.

SHELAA assessment – site SED0020 (Q62-64)

6. We support this site as an allocation within the plan. This site is under our client's ownership and control including a land to the highway at Gorselands which enables a suitable access and footpath to be provided. The applicant has also held positive pre-application discussions with East Sussex Highways who raise no concerns in respect of access or other highway matters. The HELAA questioned the land ownership of the access but this is all within the ownership of our client as can be seen on the land registry which is attached at **Appendix 1** which confirms the access is within his ownership. This was reflected in the submitted site red line.
7. The site has also been subject to tree and ecology assessment as well as input from landscape consultants which show there to be no constraints over development on the site and the applicant would be happy to share these reports with the council. This confirms any effects on biodiversity can be avoided and a net gain in biodiversity can be reached. The impact on adjoining priority habitat can be maintained and protected through the layout and buffer planting.
8. The HELAA also referred to the site being potentially part of a historic field pattern but the site instead formed part of a larger field which has previously been developed to the south. Indeed, the larger parcel extended to the south where Gorselands now stands. Thus, this modern development has eroded any wider pattern but any new development can maintain the boundaries of the remaining field parcel. This can be seen in the historic landscape evaluation within a document that has been produced for the site and the extract is attached at **Appendix 2**. Thus, this reduces any landscape effects and as the same landscape document confirms the site is relatively contained in landscape terms.
9. The applicant remains committed to bringing forward a high quality development which would include a mix of housing types as well as new landscaping, biodiversity enhancement and open space as well as improvements to the footpath link which will remain in place.

10. Therefore, it can be seen that the land is suitable, deliverable and achievable for a housing development and is considered to be the most suitable site within the village for new housing. We would be happy to work with the council on the allocation as the plan develops.

Conclusions

11. In short it is considered the housing needs will not be met by the current strategy and further sites should be identified by the council, including those within sustainable locations and within developed contexts. We support the allocation of the Gorselands site and confirm it is available, suitable and deliverable.

Appendix 1



Register View - HTML

Register view information

THIS IS A PRINT OF THE VIEW OF THE REGISTER OBTAINED FROM HM LAND REGISTRY SHOWING THE ENTRIES SUBSISTING IN THE REGISTER ON 23 JUL 2024 AT 15:06:07 . BUT PLEASE NOTE THAT THIS REGISTER VIEW IS NOT ADMISSIBLE IN A COURT IN THE SAME WAY AS AN OFFICIAL COPY WITHIN THE MEANING OF S.67 LAND REGISTRATION ACT 2002. UNLIKE AN OFFICIAL COPY, IT MAY NOT ENTITLE A PERSON TO BE INDEMNIFIED BY THE REGISTRAR IF HE OR SHE SUFFERS LOSS BY REASON OF A MISTAKE CONTAINED WITHIN IT. THE ENTRIES SHOWN DO NOT TAKE ACCOUNT OF ANY APPLICATIONS PENDING IN THE REGISTRY.

FOR SEARCH PURPOSES, THE ABOVE DATE SHOULD BE USED AS THE SEARCH FROM DATE.

THIS TITLE IS DEALT WITH BY HM LAND REGISTRY, COVENTRY OFFICE

TITLE NO: ESX304576

REGISTER LAST UPDATED ON : 19 APR 2007 AT 08:17:52

Register View

A: Property Register

This register describes the land and estate comprised in the title.

EAST SUSSEX : ROTHER

1. (19.04.2007) The Freehold land shown edged with red on the plan of the above title filed at the Registry and being Land adjoining Gorselands, Sedlescombe, Battle.

2. (19.04.2007) There are excluded from this registration the mines and minerals and the ancillary rights excepted and reserved by a Conveyance of the land in this title and other land dated 7 October 1955 made between (1) Sir James McHaffie Doak and (2) Dennis William Frank Thomas in the following

terms and the land is also subject to the following rights reserved thereby:-

"Subject to the reservation of all mines minerals and quarries of coal stone slate ironstone and other ores mines and minerals whatsoever and all such powers of getting and working the same and all such franchises rights and royalties ancient fisheries rights of fishing liberties of chase free warren and killing of game (if any) reserved by a Deed of Enfranchisement mentioned in the Schedule to the said Conveyance dated the Eighth day of July One thousand nine hundred and twenty seven so far if at all as such reservation is applicable to the property hereby conveyed."

B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

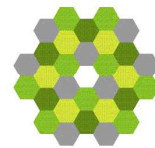
Title Absolute

1. (19.04.2007) PROPRIETOR: %PAUL ANDREW FRANK THOMAS% of Pump House Yard, The Green, Sedlescombe, Battle, *East Sussex* TN33 0QA.

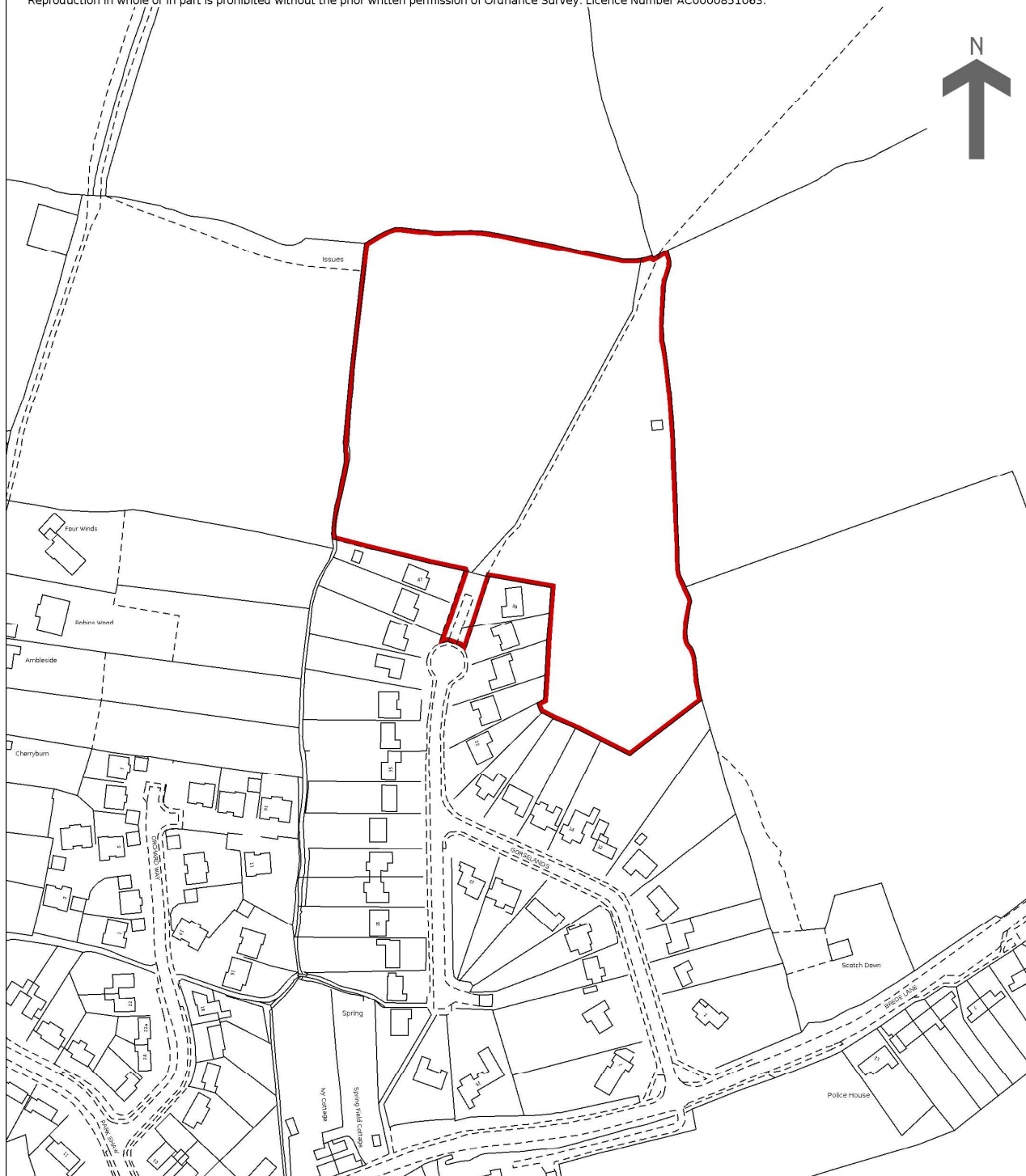
End of register

NOTE 1: The date at the beginning of an entry is the date on which the entry was made in the Register.

NOTE 2: Symbols included in register entries do not form part of the register and are used by HM Land Registry for internal purposes only.



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This is a print of the view of the title plan obtained from HM Land Registry showing the state of the title plan on 23 July 2024 at 14:52:35. This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground.

This title is dealt with by HM Land Registry, Coventry Office.

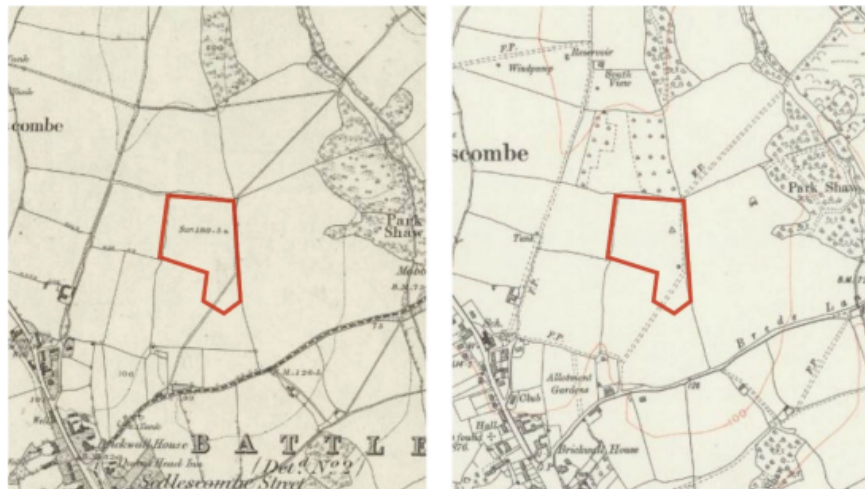
Appendix 2

Historic Landscape and Cultural Heritage

- 2.28 There are no conservation areas, historic parks or gardens or Listed Buildings of relevance to the site or the local context.

Historic Mapping Review

- 2.29 Extracts from Ordnance Survey 6-inch series mapping (1878, 1900, 1930, 1950 and 1961) were reviewed alongside the most currently available Ordnance Survey 1:25,000 Explorer mapping (2015) and Google Earth aerial photography 2004.
- 2.30 From this review, it appears that the structure or pattern of the wider landscape around the site remained unchanged until 1930s (*HBA Figure 6*).



HBA Figure 6 - Extracts from Ordnance Survey 6-inch series mapping 1878 (left) and 1930 (right)

- 2.31 The 1961 map shows the fields to the north of Sedlescombe being divided and converted to Balcombe Green housing parcels. The Google Earth aerial photography 2004 shows further urban extension onto the field east to Balcombe Green, where the site is located. (*HBA Figure 7*). More than half of the field was developed for housing, leaving only its northern, the most elevated part undeveloped. As a result of this, the footpath visible on previous plans, changed its alignment. This alignment remains to the present day. Additional woodland cover can be observed to the north and south-east of the site.

- 2.32 Whilst the historic field pattern in the immediate vicinity to the site is still present, The site is not the wholly intact relict field.



HBA Figure 7 - Extracts from Ordnance Survey 6-inch series mapping 1961 (left) and 2004 Google Earth aerial photography (right)