



# Representations to Regulation 18 Development Strategy and Site Allocation Draft Local Plan Consultation

Rother District Council

On Behalf of  
Wedgewood Homes

March 2026



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## 1.0 INTRODUCTION

- 1.1 The Representations have been prepared on behalf of Wedgewood Homes in response to Regulation 18 Development Strategy and Site Allocations Draft Local Plan Consultation being undertaken by Rother District Council. The representations in particular concern the site known as 'Land South of Poppyfields and Corner House, Playden' (Site Plan attached as an Appendix to these representations).
- 1.2 Wedgewood Homes have an option on the site 'Land South of Corner House, Rye Road, Playden' which forms part of Site Allocation PL1. Wedgewood Homes are an SME home builder who are renowned for their build quality, encompassing high specification and luxury fittings.
- 1.3 The Site was identified by the Council to be assessed as part of their Housing and Economic Land Availability Assessment (HELAA). The outcome of the assessment is the inclusion of the Site as part of a wider site allocation identified as 'Land South of Poppyfields and Corner House' (draft policy PL1). We support the principle of this allocation; however, these Representations make detailed comment in respect of the detailed wording of the Policy.
- 1.4 Notwithstanding our Client's specific land interests, these Representations have been prepared in objective terms assessed against the prevailing planning policy framework, in particular the Government's guidance set out in the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG).
- 1.5 The purpose of the Planning System is to contribute to the achievement of sustainable development. As such, NPPF paragraph 11 requires plans to apply a presumption in favour of sustainable development which for plan making means:
- 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
- 1.6 More specifically, the Draft Local Plan has been reviewed in the context of paragraph 36 of the NPPF, which requires that Local Plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:

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- a) **Positively prepared** – the plan should be prepared based on a strategy which as a minimum seeks to meet objectively assessed needs, is informed by agreements with other authorities, so that the unmet need of neighbouring authorities is accommodated where practicable to do so, and is consistent with achieving sustainable development.
  - b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence
  - c) **Effective** – the plan should be deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred
  - d) **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in this Framework and other statements of national policy.

1.7 Paragraph 20 states that strategic policies should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for homes, employment, retail, leisure and other commercial development.

1.8 Paragraph 22 outlines that strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities.

1.9 Paragraph 72 requires that policy-making authorities should have a clear understanding of the land available in their area through the preparation of a Strategic Housing Land Availability Assessment (SHLAA). From this, planning policies should identify a sufficient supply and mix of sites taking account of their availability, suitability and likely economic viability to identify a supply of specific deliverable sites for years 1-5 following the intended date of adoption, and specific, developable sites or broad locations for growth for the subsequent years 6-10, and where possible for the years 11-15 of the remaining plan period.

1.10 The Glossary to the NPPF provides definition for both 'deliverable' and 'developable' as follows:

**Deliverable:** To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.

**Developable:** To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

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1.11 The allocation of specific sites for development therefore needs to demonstrate compliance with the requirements of the NPPF and the Glossary definitions.

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## **2.0 REPRESENTATIONS TO OVERALL DEVELOPMENT STRATEGY**

- 2.1 The overall development strategy sets out the location in which new development (and therefore Site Allocations) will be focused as part of the new Local Plan. The strategy outlines that Bexhill will continue to be a town that acts as a main transport and community hub. Rye and Battle will be the centre of clusters of settlements that collectively provide what most residents need in their daily lives. Based on these principles, the development strategy sets out that the focus for growth will be in several broad locations including sensitive development in other rural settlements of the district.
- 2.2 Paragraph 83 of the NPPF sets out that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. It outlines that planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.
- 2.3 We are supportive of the overall development strategy which includes a focus for a proportionate amount of growth in rural settlements in the District such as Playden. Allowing development in rural settlements would support existing local shops and services within Playden such as St Michael's Primary School, and the local public houses and community uses such as the Women's Institute Hall and the Hub on Rye Hill community centre. Overall, the development strategy would support the vitality of rural communities in accordance with paragraph 83 of the NPPF.
- 2.4 Furthermore, the overall development strategy would support improved public transport options to better connect the cluster of settlements to the towns, ultimately improving the vitality of rural communities by providing improved connections to more services and facilities.
- 2.5 Overall, we agree that the proposed Development Strategy has been 'Positively Prepared', 'Justified', 'Effective' and 'Consistent with National Policy'.

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### **3.0 REPRESENTATIONS TO VISION FOR RYE AND THE EASTERN SETTLEMENTS CLUSTER**

- 3.1 We are supportive of the proposed vision for Rye and the Eastern Settlements Cluster and agree that the smaller settlements such as Playden should be given the opportunity to grow to support existing rural communities.
- 3.2 We agree that Playden provides good development opportunities due to its location outside the High Weald National Landscape. In terms of sustainability, Playden has a good level of existing services, including a primary school, public house and community facilities. It also has a regular bus service running along the Rye Road. Future occupiers of the Site would therefore have access to a range of existing services and public transport options.
- 3.3 Furthermore, it is located approximately 1mile from Rye which is identified as a Town offering many services within the Draft Local Plan. Site allocations within Playden therefore have the opportunity to provide good connections into Rye where future occupiers would benefit from sustainable travel options, making the sites highly sustainable.
- 3.4 Overall, we agree with the proposed vision and development strategy for Rye and the Eastern Settlements Cluster. It identifies opportunities for the smaller villages to grow and thrive, subsequently supporting local services and the vitality of rural communities, in accordance with para 83 of the NPPF.

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## **4.0 REPRESENTATIONS TO POLICY ALLOCATION PL1**

- 4.1 The Site was identified by the Council to be assessed as part of their HELAA as a potential site for residential redevelopment. Between April and July 2024, Rother District Council undertook a Regulation 18 consultation which focused on planning policies (including for the development strategy and thematic topic area policies) but did not include proposed site allocations.
- 4.2 Land south of Corner House, Rye Road was identified in the Site Assessments as site number PLA0013. The Site Assessment concluded that the Site could be suitable for limited residential development together with the adjoining site to the east. The Assessment outlines that estimated development potential is 10 dwellings and the anticipated timescale for development is within 5 years.
- 4.3 The site to the east, Land South of Poppyfields, Houghton Green Lane was also identified by the Council to be assessed as part of their HELAA (site no. PLA0012). The assessment concluded that the site is suitable for residential development subject to the retention of the adjoining village hall car park and additional landscaping. However, the assessment sets out that there may be accessibility and highway safety constraints which would be difficult to overcome in terms of the need to provide pedestrian linkages towards Rye Road and the nearest primary school.
- 4.4 Wedgewood Homes have an Option on the Site at Land South of Corner House, Rye Road (PLA0013) only.
- 4.5 The HELAA identifies both Sites as being delivered within 5 years. As such, in reference to paragraph 68, the Council is required to demonstrate that these sites are 'deliverable' in accordance with the definition provided in the Glossary. In this regard, sites should be available now, offer a suitable location for development now and be achievable with a realistic prospect that housing will be delivered on the site within 5 years.
- 4.6 Wedgewood Homes ongoing engagement with the Local Plan process provides the Council with certainty and assurance in respect of the availability and overall deliverability of the Site. Wedgewood Homes have an option on the Site, and should the Site be allocated, they would seek planning permission to develop the Site straight away. As such, development of the Site would be achievable within 5 years of the Site being allocated. The allocation of the Site would therefore comply with the requirements of NPPF para 68.
- 4.7 The Draft Local Plan allocation groups the Land South of Corner House with the Site at Land South of Poppyfields as part of a wider site allocation, the details of which are included within

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draft policy PL1. We are supportive of the principle of the allocation of Land south of Corner House; however, we have some concerns in respect to the overall deliverability of the Site Allocation without adjustments to the policy wording which we detail below.

- 4.8 The Site boundary provided in the proposed policy shows the red line to run parallel to the west of the Women's Institute Car Park. However, Wedgewood Homes have an option on the land further west of this, adjacent to the existing outbuilding within the curtilage of Corner House. We therefore recommend that the Site boundary is amended so that the red line runs parallel to east of the existing outbuilding. A Site Plan including the suggested red line boundary is attached as an Appendix to these Representations.
- 4.9 The supporting text to the Policy sets out that the most appropriate access point to the Site is likely to be though an existing car parking area which is used by the Women's Institute Hall. It outlines that landowner agreement to the use of the car park land would be necessary which indicates a third-party ownership. Point iii. of the policy itself states that the development on the Site must provide a replacement car parking area should the existing community car parking be reduced through creation of a site access.
- 4.10 As such, the suggested location of the vehicular access point into the Site would require changes to third party land. Therefore, there is no certainty that the suggested access would be deliverable. It could also lead to a ransom situation as the development of the Site would be beholden to the agreement of a change to third party land to allow the access into the Site.
- 4.11 A Highway Technical Note has been prepared by Ardent Consulting Engineers in support of these Representations which considers an alternative access point into the Site that would not require any changes to third-party land and is in the control of Wedgewood Homes. The Note concludes that an access to the west of the car park would be the most suitable. It sets out:
- The proposed access can be achieved without the rights of way, land ownership, or operational constraints identified at the Women's Institute Car Park.
  - There is already an established access point in the proposed location that has previously served access to a much larger agricultural land holding.
  - The accompanying Proposed Access Location Plan demonstrates that a suitable access can be delivered from Houghton Green Lane in accordance with local and national design guidance.
- 4.12 Furthermore, the suggested access through the WI Car Park is subject to a land level difference requiring a ramped entry. To achieve suitable visibility splays from this access, the existing

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land bank would need to be cut into, together with the removal of existing vegetation which would result in a detrimental impact to the character of the rural lane. The proposed access from the west of the WI Car Park access would provide suitable visibility splays without the removal of any existing land banking or vegetation and is therefore considered to be a more suitable option. As such, it is recommended that policy PL1 is amended to require access into the Site to be taken from Houghton Green Lane as suggested by the supporting Highway Note.

- 4.13 The proposed access would provide adequate visibility splays, would not result in any highway safety issues, and it would ensure that the Site would not have to be accessed through third-party land, making the Site more 'deliverable'. The suggested amendments would ensure the policy is 'Justified', 'Effective' and 'Consistent with National Policy'.
- 4.14 The HELAA includes background information in relation to how the sites were identified. Both sites within the allocation were identified through the Council's own search. As such, there is no information available regarding the ownership of the other site and whether the owner is willing to bring the land forward for development and therefore whether it is 'available' or 'deliverable'.
- 4.15 Multiple land ownerships and a varied level (or no level) of engagement may result in the wider Site not being deliverable should the various landowning parties be beholden to one another in either master planning or application submission.
- 4.16 We do not object to the Site being included as part of a wider allocation, albeit the preference would be separate allocations, possibly with a requirement for a point of connection between the two. However, if the Site is to form part of a wider allocation to ensure both sites are 'deliverable', we recommend that the wording of the Policy is amended to allow the sites to come forward together or individually.
- 4.17 Point viii. of the Policy requires development to protect the setting of the Grade II listed building "Corner House" (also known as the Playden Oasts Hotel) to the north-west of the Site. However, Corner House is not listed, and it is not also known as Playden Oasts Hotel, Corner House and Playden Oasts Hotel are two separate buildings. Corner House is located to the north-west of the Site and Playden Oasts Hotel which is Grade II listed is located to the south-west of the Site, south of The Hooks. Point viii. of the policy is therefore written in error and consequently, we recommend removing this point from the policy.
- 4.18 We therefore recommend that the wording of the Policy is amended as follows:

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**Policy Reference:** PL1

**Site name:** Land South of Poppyfields and Corner House

**Site identification:** New site identified through HELAA

**Greenfield/ Brownfield:** Greenfield

**Sub-area:** Rye and the eastern settlements cluster

**Allocated use and capacity:** ~~The site is allocated for residential development comprising some 25 new dwellings.~~ The site is allocated for residential development with an estimated capacity of 25no. dwellings; or 15no. dwellings for the eastern section of the site (Land South of Poppyfields) and 9no. dwellings for the western section of the site (Land South of Corner House).

**Policy text:**

Development on this site must:

- i. Provide a policy-compliant amount of on-site affordable housing in line with policy HOU2 of the Rother Local Plan.
- ii. Include a new vehicular access **to the east of Corner House** and necessary off-site highway improvements to provide for access by pedestrians and cyclists.
- ~~iii. Provide a replacement car parking area for community use off Houghton Green Lane, should the existing area for community car parking be reduced through creation of a site access.~~
- iv. Be informed by a tree survey to ensure the retention and protection of the mature trees on the western boundary of the site, which should not be included within residential garden areas.
- v. Include an area of green infrastructure (which could contain public open space and biodiversity net gain) in the western part of the site, which also facilitates the retention and protection of the mature trees on the western boundary.
- vi. Retain and enhance existing trees and hedgerows on the northern and southern boundaries other than any short section to be removed from the northern boundary to facilitate a vehicular access point, which should be minimised as far as possible.
- vii. Include a new boundary hedgerow of native species to define the site's eastern boundary.
- ~~viii. Protect the setting of the Grade II listed building "Corner House" (also known as the Playden Oasts Hotel) to the north west of the site.~~
- ix. Include an assessment and evaluation of the site's archaeological potential and the implementation of any mitigation measures identified through the assessment.

- 4.19 The recommended amendment to the Policy would allow each site to come forward independently meaning the different land owners would not be reliant on each other and would not jeopardise deliverability of the allocation should one of the Sites not be brought forward by the owners.

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4.20 Without amendments to the wording of the Policy to allow the sites to come forward individually, to reduce the reliance on master planning across multiple land ownerships, it is considered that the policy may not be 'Justified' or 'Effective' and therefore may not be 'Sound'.

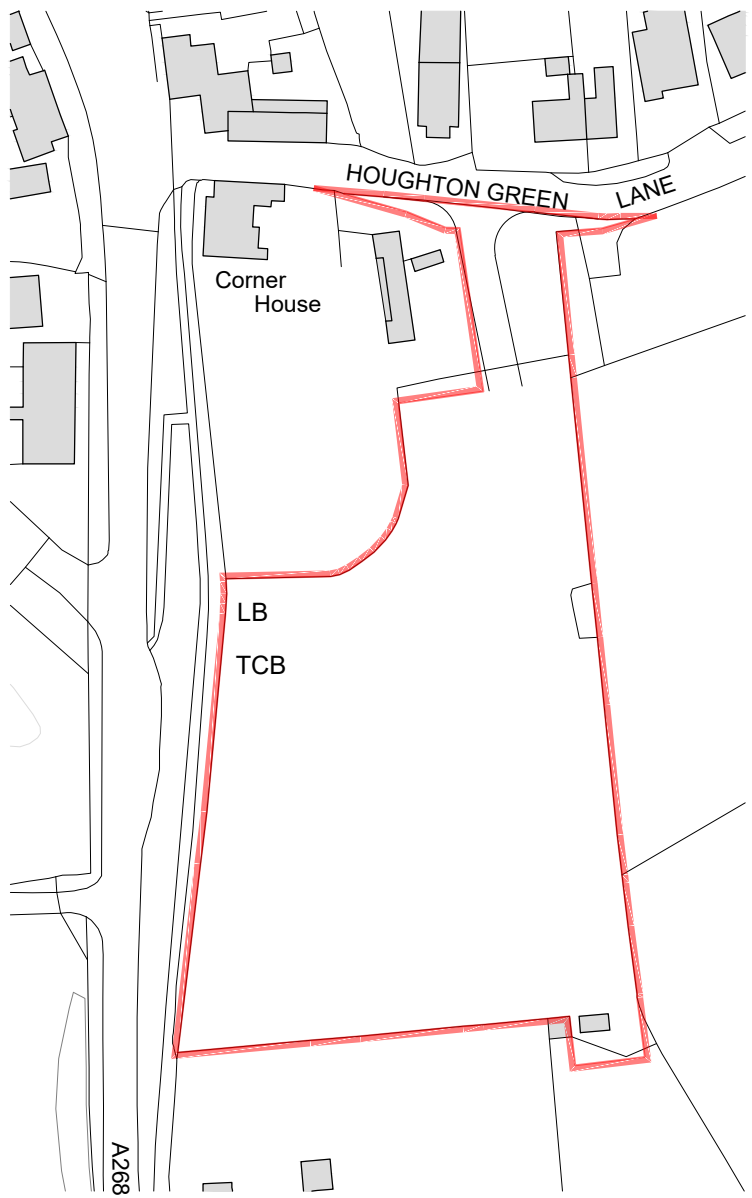
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## 5.0 CONCLUSIONS

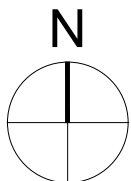
- 5.1 Wedgewood Homes is supportive of the principle of the allocation of the 'Land South of Corner House' as part of the wider 'Land South of Poppyfields and Corner House' policy allocation (PL1). Wedgewood Homes have an option on the Site and there are no significant constraints that would impact the viability of the development. The Site is therefore 'Deliverable' and would positively contribute towards the achievement of the Council's housing requirements over the Plan Period.
- 5.2 However, the policy requires access into the Site to be provided through an existing car parking area which is third party land. As such, there is no certainty that the access would be deliverable. A Highway Technical Note has been produced by Ardent Consulting Engineers in support of these Representations which concludes that a direct access from Houghton Green Lane would be more suitable.
- 5.3 It is therefore recommended that the wording of the Policy is amended to require access into the Site to be taken from Houghton Green Lane as suggested by the supporting Highway Note. The proposed access would provide adequate visibility splays, would not result in any highway safety issues, and it would ensure that the Site does not have to be accessed through third party land, making the Site more 'Deliverable'. The suggested amendments would ensure the policy is 'Justified', 'Effective' and 'Consistent with National Policy'.
- 5.4 The allocation (policy PL1) also requires both Land south of Corner House and Land south of Poppyfields to come forward together. However, each site is under a different ownership and the policy as it is proposed therefore may result in the whole site not being delivered should one party decide to not bring forward their part of the allocation.
- 5.5 It is therefore recommended that the policy is amended to allow the whole site allocation to either come forward together or individually to reduce the reliance on a site wide master plan and singular planning application. Without these amendments, it is considered that the policy may not be 'Justified', or 'Effective' and therefore may not be 'Sound'.

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**6.0 APPENDIX 1 – SITE BOUNDARY PLAN**



REV	DATE	Notes



PROJECT TITLE  
Land south of Corner House  
Playden

DRAWING TITLE  
Site Plan  
Site Boundary

DATE	DRAWN	SCALE	ORIGINAL
March '26	FC	1:1250	A4

PL / 000 / 1001