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Rother Regulation 18 Local Plan Representation

**On behalf of Catesby Strategic Land Ltd & Rurban
Estates Limited**

In respect of High House Farm, Ninfield Road, Bexhill

July 2024 - DHA/33413



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1. Vision Document
2. Heritage Note
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4. Landscape Visual Appraisal

1 INTRODUCTION

1.1 PURPOSE OF THIS REPRESENTATION

- 1.1.1 This representation has been prepared on behalf of Catesby Strategic Land Ltd ('Catesby') and Rurban Estates Limited ('Rurban') in response to the Rother Draft Local Plan (Regulation 18) Consultation, which runs until 23rd July 2024.
- 1.1.2 Rother District Council (RDC) is in the process of preparing a new Local Plan to set out a strategy for development across the district for the period to 2040 and is seeking views on the overall spatial strategy, the vision and objectives, its supporting evidence base documents and any of the Plan's draft policies.
- 1.1.3 Catesby and Rurban control 16.1 hectares of land (within a single ownership) at High House Farm, situated on the northern edge of Bexhill ('the site'), which has been promoted through the RDC Call for Sites and is identified as a potential allocation in the Housing and Economic Land Availability Assessment (HELAA).
- 1.1.4 This report therefore considers the draft policies of the Plan, whilst assessing the planning case for the land at 'High House Farm' as a potential housing allocation.
- 1.1.5 For the avoidance of doubt, this representation document is intended to be read alongside the online form which has been completed separately and refers to this document. Additionally, a Vision Document prepared by edge Urban Design sets out a masterplan for the site and is attached to these representations at Annex 1, along with a suite of technical documents listed below.
- Annex 2 - Heritage Note (Pegasus Group);
 - Annex 3 - Transport Technical Note (DHA Transport);
 - Annex 4 - Landscape Visual Appraisal (LDA Design).

Plan Context

- 1.1.6 Whilst this consultation falls under the scope of Regulation 18 and remains 'informal', the next pre-submission (Regulation 19) draft will need to demonstrate that it has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is 'sound'. In line with the current requirements of the NPPF, to be sound the final draft plan must be:
- Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the Framework.

1.1.7 Having considered the content of the consultation documents, and the evidence and assumptions that underpin them, we consider that the draft Local Plan provides an excellent opportunity for RDC to plan for growth over the plan period in a positive and sustainable manner. Early thoughts in respect of potential growth locations and individual sites are encouraging, however it is also clear that there are several issues that need to be addressed prior to the finalisation of the draft Local Plan if the Council is to ensure that the plan meets the tests of soundness.

1.1.8 To provide constructive feedback and assist the process, this submission provides comments on a topic basis, highlighting where we believe any areas of concern lie and where modifications are required.

2 RESPONSE TO THE DRAFT LOCAL PLAN

2.1 Q2. WHAT ARE YOUR VIEWS ON PROPOSED TWIN OVERALL PRIORITIES TO BE 'GREEN TO THE CORE' AND 'LIVE WELL LOCALLY'?

- 2.1.1 The consultation document asks respondents to comment on the extent to which they agree with the overall vision and objectives of the Local Plan.
- 2.1.2 According to the Vision, by 2040, "bold solutions will have successfully addressed the climate and biodiversity emergencies and the housing crisis." These are translated into two Overall Priorities: "Green to the Core" which means considering the impact of all planning decisions on the climate emergency, the biodiversity crisis and the High Weald National Landscape, and "Live Well Locally." The latter means considering the goal of creating healthy, sustainable communities, supporting residents in terms of access to jobs, services and facilities, connected and compact neighbourhoods and new places that foster a sense of belonging, identity and shared experience. While we agree with the overall thrust of these priorities, neither adequately go to the heart of the urgent need for housing, including specifically addressing the current housing crisis.
- 2.1.3 The housing crisis is acute in Rother and getting a Local Plan in place is the first step to ensure proper, planned delivery of housing in a consistent and sustainable manner to ensure the Council can realise its two overall priorities. However, the Local Plan needs to honestly address the scale of the housing shortfall and the importance of meeting the local housing need in full. Accordingly, we recommend that "Live Well Locally" is expanded to specifically confirm that it will be the aim of the Council to address the housing crisis, meeting local housing need in full and maximising housing delivery.

2.2 Q3: WHAT ARE YOUR VIEWS ON THE KEY ISSUES THAT HAVE BEEN IDENTIFIED AND IS THERE ANYTHING SIGNIFICANT MISSING?

- 2.2.1 The draft Local Plan seeks to address ten key planning issues, which are stated to stem directly from the Vision for the Plan and link to the Council's two 'Overall Priorities'. In summary these are:
- Delivering carbon reduction, climate change adaptation, and responding to the 'Climate Emergency';
 - Meeting the overall local demand and need for housing (including affordable and specialist need);
 - Securing economic improvement;

- Improving access to jobs, services, and facilities, and supporting sustainable rural economies and communities;
- Conserving and enhancing the landscape and environmental quality, alongside delivering biodiversity gains and improvements to green infrastructure;
- Delivering infrastructure to support growth and strengthen sustainability;
- Promoting physical and mental health and wellbeing, healthier lifestyles, and reducing inequality and deprivation;
- Planning for an ageing population with adaptable homes and a range of accommodation options;
- Providing better sports, leisure, culture, and tourism facilities for residents and visitors; and
- Managing uncertainties and contingency planning for long-term climate resilience.

2.2.2 In response, all ten 'key issues' are important and should be integrated into the overall strategy. As previously mentioned, the need to fully address housing needs should be explicitly identified as an "Overall Priority," as it is not adequately captured by the strategic priorities of "Green to the Core" and "Live Well Locally." We welcome the recognition of the housing need within the 10 key issues.

2.3 Q4. WHAT ARE YOUR VIEWS ON THE COUNCIL'S OBJECTIVES FOR THE LOCAL PLAN?

- 2.3.1 The draft Local Plan sets out ten strategic spatial objectives, which will be used to support and deliver sustainable development.
- 2.3.2 Spatial Objective 4 recognises the need to respond to the housing crisis and help facilitate the delivery of housing to meet the needs to different groups. This will be achieved by maximising the potential opportunities for residential development in sustainable and deliverable locations. We strongly support this objective and it is encouraging that the Council specifically acknowledge the housing situation as a crisis. We do question the validity of inferring that there is a matter of choice about the delivery of housing and economic needs.
- 2.3.3 As outlined within the consultation document, there is a need to identify enough sites to deliver a minimum of 737 homes per year. This target is not an arbitrary Government top-down target, and instead is based on the Government's standard methodology and directly corresponds to the district's established population, affordability, and future needs. Accordingly, creating a place where the range of housing needs are being met in full, and improved, should be clearly explained to

be a minimum requirement – it is the way it is achieved that should be subject to more open questions to the public.

- 2.3.4 We would suggest some minor modification to clarify that the plan is positively prepared and fully aligned with the provisions of the NPPF to make it clear that the plan as a minimum, seeks to meet the area’s objectively assessed needs:

"Respond to the housing crisis and help facilitate the delivery of housing to meet the needs of different groups in the community in full [...]"

- 2.3.5 Spatial Objective 5 states that the Council will deliver sustainable growth and regeneration in Bexhill and its edges along with the Hastings Fringes. The objective seeks to locate development in the most sustainable and least environmentally constrained areas of the district. We strongly support this Spatial Objective, which recognises the strategic role that Bexhill plays and the opportunities that it presents for sustainable growth.

- 2.3.6 Similarly, we are supportive of Spatial Objective 7 which seeks to focus growth in sustainable locations, or places that can be made sustainable through supporting infrastructure and community facilities.

- 2.3.7 It is vital that these commendable objectives are carried forward into specific policies and site allocations in subsequent versions of this emerging Local Plan, ensuring that the potential of Bexhill to grow is maximised by using all available and suitable potential housing sites. We would urge the Council to engage with site promoters to ensure that the delivery of development on these sites can be positively planned.

2.4 Q6. WHAT ARE YOUR VIEWS ON THE COUNCIL’S PROPOSED POLICY GTC1: NET ZERO BUILDING STANDARDS?

- 2.4.1 We support the general principle of ensuring that new development contributes to climate change mitigation by reducing emissions through energy efficiency and the way that fossil fuels are used, as well as addressing the ways in which developments are designed, constructed and operate over their lifetime. However, draft policy GTC1 seeks to set ambitious net-zero carbon standards for new development that go beyond the minimum standards provided by the Building Regulations.

- 2.4.2 On 13 December 2023, a Written Ministerial Statement advised that while some local authorities' plans exceed national efficiency standards, the Government aims to balance improving home efficiency with ensuring sufficient housing is built. The Statement also notes that multiple local standards can increase costs and complexity, undermining economies of scale. Thus, the Government does not expect plan-makers to set local energy efficiency standards beyond current or planned building regulations. It advises that:

"any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures:

- That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework.*
- The additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP)."*

2.4.3 The Draft Plan recognises that this policy does not currently meet these criteria. Moreover, the detailed requirements do not reflect the evolving nature of zero carbon building policy, where standards inevitably will change in response to technological and market advancement and more stringent nationally set standards. Policy GTC1 contains little flexibility to allow for such changes and provides a high degree of certainty about the standards that will be applied over the lifetime of the Plan. This brings into question whether the evidence that supports the standards justifies the approach as a sound one.

2.4.4 Moreover, this needs to be justified by viability testing at the plan making stage and sufficiently flexible to ensure that it does not threaten the ability of individual sites to be developed viably, nor the Council's ability to achieve its other identified Main Priorities. Alternatively, we recommend that the Local Plan supports low-carbon and gas-free development more generally, rather than necessitating explicit net-zero compliance.

2.5 Q15. WHAT ARE YOUR VIEWS ON THE COUNCIL'S PROPOSED POLICY FOR HEAT NETWORKS?

2.5.1 According to draft policy GTC5, all proposals of 10 dwellings or more, or 1,000 sqm or more of non-residential floorspace in Bexhill-on-Sea will be required to make developer contributions towards the establishment of district heat networks. Supporting text refers to existing building heat density and the presence of large, non-residential buildings with sufficient head demand to act as anchor loads. Accordingly, it would appear that this policy is intended to be directed at projects within central Bexhill rather than new developments on the edge of Bexhill.

2.5.2 The Climate Change Study (July 2023) produced by Ove Arup & Partners sets out the opportunities and implications for renewable energy and district heat networks within Rother, however this requirement must also be subject to viability testing to ensure that the sites and scale of development identified in the Plan is not subject to such a scale of obligations that their ability to be developed viably is threatened. Indeed, the Study recognises that more detailed techno-economic

feasibility and grid constraint analyses are required to confirm the viability of potential district heat network locations across Rother.

- 2.5.3 To avoid ambiguity, if the Council progresses with the proposed policy on heat networks, it is crucial that the policy specifically confirms a geographical area that it will apply to. At this stage, we have concerns that the draft policy is not based on proportionate evidence and is therefore not “justified” (NPPF, paragraph 35).

2.6 Q20. WHAT ARE YOUR VIEWS ON THE COUNCIL’S PROPOSED POLICY FOR LOCAL NATURE RECOVERY AREAS?

- 2.6.1 The draft Local Plan requires all development to meet the objectives of the East Sussex (including Brighton & Hove) Local Nature Recovery Strategy (LRNS), taking opportunities to deliver ecological networks and green infrastructure.
- 2.6.2 The Responsible Authorities were appointed in the 2023 when they began setting up the process and building the baseline evidence that supports the LRNS strategies. At the time of writing, it is anticipated that the draft strategies will be shared for public consultation in early 2025, before being published later in the year. It is therefore critical that the Draft Local Plan provides enough flexibility to respond to an evolving strategic context to satisfy the test of soundness required for Local Plans to be made.

2.7 Q22. WHAT ARE YOUR VIEWS ON THE COUNCIL’S PROPOSED POLICY FOR BIODIVERSITY NET GAIN?

- 2.7.1 We note that under policy GTC8, all qualifying development proposals must deliver at least a 20% measurable Biodiversity Net Gain (BNG), and that BNG must be provided on-site wherever possible. The draft policy states that off-site provision will only be considered where it can be demonstrated that, after following the biodiversity gain hierarchy, all reasonable opportunities to achieve gains on site have been exhausted.
- 2.7.2 Whilst we support the principle of achieving net gain, there is no apparent evidence of the Council understanding the implications of what a 20% uplift would require, nor any justification as to why provision above the mandatory 10% requirement is sought.
- 2.7.3 In February 2024, Planning Practice Guidance (PPG) was updated to advise plan-makers that they should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies, they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration is also needed to be given as to how the policy will be implemented (Paragraph: 006 Reference ID: 74-006-20240214).

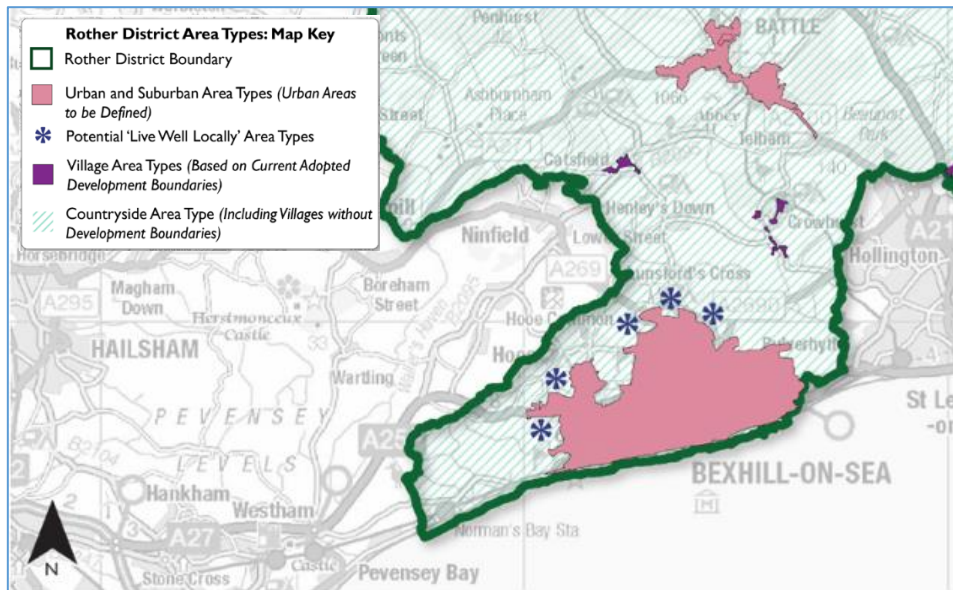
- 2.7.4 Comparatively, the Draft Plan states that a higher level is justified because “opportunities to deliver this off-site, if necessary, are available locally” and because “the viability of development is unlikely to be unduly impacted in most cases”. The Plan is accompanied by an Environmental Management Background Paper (2024), which refers to a justification for a 20% net gain (dated September 2020) and a viability assessment (dated June 2022) prepared by the Kent Nature Partnership. Neither of these documents relate to Rother District, nor meet the requirements of the PPG.
- 2.7.5 If this policy is implemented, development assumptions must factor this in, and ultimately, more sites will be needed to deliver the Local Plan housing requirement as 20% Biodiversity Net Gain will inevitably reduce developable areas resulting in lower yield of dwellings from allocated sites.
- 2.7.6 Moreover, the draft policy seeks to go beyond the legislative requirements requirements in respect of the application of the Biodiversity Gain Hierarchy, which is set out within articles 37A and 37D of the Town and Country Planning (Development Management Procedure) (England) Order 2015 and within the PPG (Reference ID: 74-008-20240214). The draft Local Plan provides no justification for seeking to go beyond the legislative requirements and national Government guidance, and it should be acknowledged that it is perfectly reasonable for BNG to be delivered off-site or through the purchasing of credits if necessary.
- 2.7.7 Consequently, at this stage we are concerned that policy GTC8 is not underpinned by appropriate evidence, including that the approach taken will be viable, and is therefore not “justified” (NPPF, paragraph 35). Alternatively, the Draft Plan can complement the statutory framework for biodiversity net gain by, for instance, including policies which support appropriate local offsite biodiversity sites, including whether specific allocated sites for development should include biodiversity enhancements to support other developments meet their net gain objectives in line with Local Nature Recovery Strategies.

2.8 Q28. WHAT ARE YOUR VIEWS ON THE AREA TYPES AND DENSITIES PROPOSED AS A KEY DRIVER TO LIVE WELL LOCALLY?

- 2.8.1 Proposed Policy LWL1 sets out minimum densities for different areas, as defined by Rother’s Density Study:
- Urban areas in Bexhill, Battle and Rye: 60-90+ dph;
 - Suburban areas in Bexhill, Battle, Hasting Fringes and Rye: 45-75 dph;
 - Live well locally areas: 45-60 dph;
 - Village areas (with development boundaries): 25-45 dph.

2.8.2 It is not clear from the Density Study (April 2024) whether these figures are measured in terms of gross or net density. Moreover, these area types have not yet been confirmed, so it is difficult to comment on the proposed density ranges. Notwithstanding this, Figure 2.1 (extract below) in the Draft Plan provides an indicative map of how the area types proposed by Policy LWL1 could be spatially defined. 'Live Well Locally' area types are likely to relate to the proposed growth areas in West and North Bexhill, including our client's site at High House Farm.

FIGURE 2.1: PROPOSED DENSITY AREAS



2.8.3 Whilst we support the efficient use of land and, where appropriate, higher densities, the policy should not be overly prescriptive to ensure that individual site characteristics are appropriately considered.

2.9 Q30. WHAT ARE YOUR VIEWS ON THE COUNCIL'S PROPOSED POLICY ON FACILITIES AND SERVICES?

2.9.1 According to proposed policy LWL2 (Facilities & Services) all development proposals for one or more new dwellings in Urban, Suburban and 'Live Well Locally' Area types, must be located within "an 800m safe, usable walking distance of a mix of local amenities". They must provide, or contribute to, a network of safe, attractive, varied public squares and open spaces, play, sports and food growing opportunities. Additionally, proposals of 150 dwellings or more must upgrade or contribute to new indoor meeting places.

2.9.2 This policy seeks to ensure people of all ages and abilities should be able to reach their daily needs within a "20-minute walk or bike ride", with Rother adopting the position that an 800 metre walk and back again represents a 20-minute journey (10 minutes each way). Though we agree that people of all ages and abilities

should be able to reach their daily needs without having to use a car, no evidence has been put forward to justify this figure.

- 2.9.3 Whilst it is admirable, and correct, that the draft Local Plan seeks to direct sustainable growth to Bexhill, it is wholly unrealistic to expect that all new development can be located within 800m of “a mix” of local amenities. Cited examples include a food shop, park, primary school, post office and a GP surgery. The 'Live Well Locally' area is a suburban edge location, and as such, it is inappropriate to expect the same level of services and facilities as those available in the centre of Bexhill. Flexibility must be provided so as not to preclude sustainable developments which do not meet the stringent test set out at policy LWL2. This is particularly important in the context of the current acute housing need in Rother.
- 2.9.4 Moreover, the policy does not take into account access to public transport and the role this plays in providing access to services. It is noted that there are bus stops in close proximity to the site which provide regular services towards the local centre. As part of the proposal, we are improving pedestrian and cycle links, as well as proposing to make enhancements to the local bus stops. The NPPF recognises that opportunities for sustainable travel will differ for sites in urban and rural locations; therefore, the site accessibility should be assessed reasonably in this context.
- 2.9.5 Policy LWL2 sets out a number of prescriptive requirements in terms of provision of infrastructure on sites above certain size thresholds in terms of numbers of dwellings. We do not object to the need for sites to provide necessary infrastructure but it is important that the subsequent Regulation 19 draft Local Plan sets out the appropriate justification, including on a site-by-site basis where draft site allocations are concerned.
- 2.9.6 We consider that the principles of local living should be embedded more broadly in the Local Plan, to reflect a longer-term aspiration and healthy and sustainable living, rather than being imposed as a restrictive policy requirement.

2.10 Q51. WHAT ARE YOUR VIEWS ON THE COUNCIL'S PREFERRED SPATIAL DEVELOPMENT OPTIONS?

- 2.10.1 The Council has considered a series of potential spatial development options (SDOs), and these have been individually assessed through the Sustainability Appraisal process. Rother's proposed development strategy is a combination of the following options:
- Bexhill Greenfield Growth (without new multi-modal transport corridor); (SDO3A)
 - Radial settlement network connected to Bexhill and Hastings (SDO2)

- Village Clusters centred around Rye and Battle; (SDO1)
- Sustainable settlement growth, with focus along the A21 Corridor; (SDO4, SDO10)
- Hastings fringes urban growth (SDO5)
- Brownfield Intensification and Redevelopment. (SDO6)

2.10.2 For the avoidance of doubt, we are supportive of the proposed strategy which seeks to locate development on the northern and western edges of the built-up area of Bexhill to create new compact, connected communities (SDO3A). As demonstrated by Figure 2.2, Rother is a highly constrained district given its significant environmental and other constraints, including the extent of the High Weald National Landscape, areas of flood risk, designated wildlife sites, ancient woodland, heritage designations and a widespread rural population.

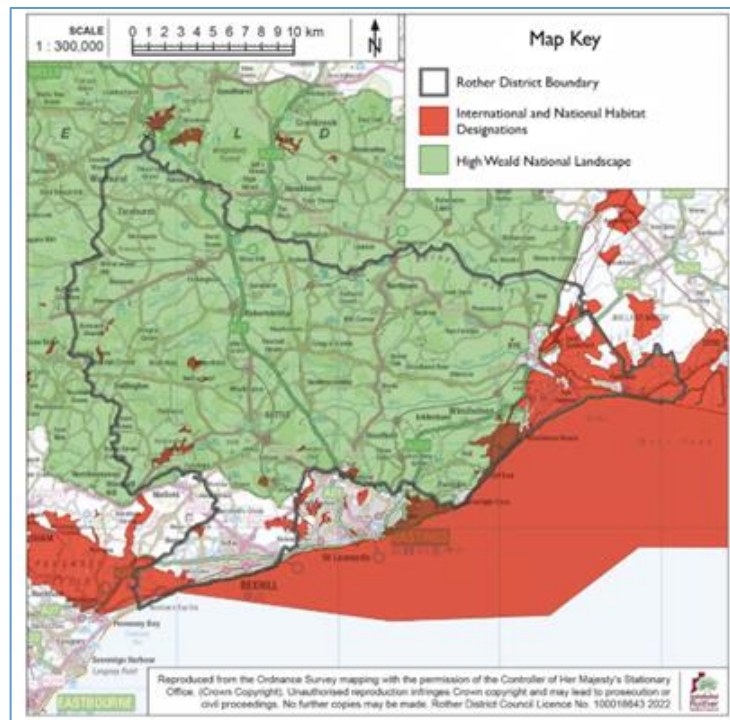


FIGURE 2.2: PROTECTED LANDSCAPE AND ENVIRONMENTAL DESIGNATIONS

2.10.3 In this regard, Bexhill has been identified in the Settlement Study (April 2024) as the most sustainable settlement for growth. Consequently, opportunity must be taken to utilise every suitable site for housing. This is reflected in paragraph 5.40 of the Draft Plan, which states that development on greenfield land will be necessary to meet local needs due to the lack of available brownfield sites.

2.11 Q54. WHAT ARE YOUR VIEWS ON THE COUNCIL’S PROPOSED SPATIAL DEVELOPMENT STRATEGY AND PROPOSED MINIMUM TARGETS FOR HOUSING AND EMPLOYMENT GROWTH?

- 2.11.1 According to the Overall Spatial Development Strategy, the Council will meet the local need for all forms of housing. To achieve this, a minimum of 5,158–7,287 dwellings at an average rate of 258–364 dwellings per annum (dpa) are proposed to be constructed by the end of the Plan period in 2040.
- 2.11.2 The draft Local Plan is evidenced by a Housing and Economic Development Needs Assessment Update (HEDNA) (February 2024) jointly prepared with Hastings Borough Council to assess future development needs up to 2040. This states that the Standard Method calculation results in a minimum Local Housing Need (LHN) figure of 737 dpa for Rother, which is in sharp contrast to the proposed target of 258–364 dpa and the statement within the Overall Spatial Development Strategy is disingenuous.
- 2.11.3 As evidenced in Table 2.1, the Council has consistently failed to deliver against its housing requirement. This has no doubt led to the current acute shortage of housing in Rother and its current identified need. During this time, the need for affordable housing has also become even more acute, with 238 dpa required for affordable rented housing tenure and 87 dpa required to be affordable home ownership tenure. Therefore, the total net annual affordable housing need for the period 2021 to 2044 is 325 dpa (equivalent to 44% of the local housing need figure based on 737 dpa, which is high).
- 2.11.4 It is clear therefore, that the proposed minimum targets for housing growth do not meet the local need for all forms of housing.

Historic Housing Delivery in Rother			
Year	Completions	Requirement (at that time)	Difference
2015/16	246	336	-90
2016/17	283	335	-52
2017/18	186	336	-150
2018/19	255	336	-81
2019/20	247	363	-116
2020/21	175	490	-315
2021/22	239	740	-501

TABLE 2.1: SUMMARY OF HISTORIC HOUSING DELIVERY IN WEALDEN

- 2.11.5 The growing need for both market and affordable housing lends emphasis to the requirement for the Council to plan to meet its full assessed need, as required by the NPPF (paragraph 11b and paragraph 23), supporting the Government’s objectives to significant boost the supply of homes (NPPF, paragraph 60). The new Labour Government’s recent announcements about the restoration of mandatory

housing targets only go to emphasise the importance of RDC planning to meet the need in full through the plan making process.

Duty to Co-operate

- 2.11.6 It is also important that the Council has regard to any needs that cannot be met within neighbouring areas when establishing the amount of housing to be planned for, to ensure the Plan is “positively prepared” (NPPF, paragraph 35).
- 2.11.7 According to the Engagement and Duty to Cooperate Statement, Rother has prepared a Joint Statement with Hastings Borough Council in order to develop and action matters of cross-boundary importance and most importantly, explore joint opportunities to maximise housing delivery. However, other LPAs that neighbour Rother District who may not be able to meet their local housing need include Wealden, Tunbridge Wells, and Ashford, whilst Eastbourne Borough Council has recently declared a Housing Emergency, following a similar declaration by Crawley Borough Council.
- 2.11.8 RDC will be required to demonstrate how they have sought to engage with these authorities to establish whether they should be accommodating any unmet need. Demonstrably failing to consider this issue will place the Local Plan at risk of not being found sound. It is therefore even more pressing that the Council plans to meet its housing objective in full, since this could contribute to a worsening housing supply and affordability if there is consistent under delivery of housing in this part of East Sussex and Kent.

2.12 Q57. WHAT ARE YOUR VIEWS ON THE TWO BROAD LOCATIONS FOR GROWTH (WEST BEXHILL AND NORTH BEXHILL) AND THEIR GROWTH POTENTIAL IN THE BEXHILL STRATEGY AREA IN FIGURES 13, 14 & 15?

- 2.12.1 Rother’s proposed development strategy has been split into five spatial sub-areas, each with their own vision statement and identified distribution of development.
- 2.12.2 Bexhill is identified as the key focus for sustainable growth, within the urban area on brownfield sites and at its edges through ‘live well locally’ urban extensions on greenfield sites. As aforementioned, we are strongly supportive of the proposed strategy which seek to locate development on the northern and western edges of the built-up area of Bexhill to create new compact, connected communities. Our client’s site at High House Farm is located within the North Bexhill Potential Development Growth Area, as shown in Figure 2.3 and it is encouraging that the draft Local Plan recognises the inherent sustainable of this location and its suitability for housing growth.



FIGURE 2.3: BEXHILL SUB-AREA

2.12.3 The Draft Plan additionally illustrates the potential development strategy for Bexhill, in terms of the numbers of dwellings that could be delivered over the Plan period (Table 2.2). This includes potential sites which may be suitable, available and achievable for development (as listed in the draft HELAA), subject to further assessment work and the result of the Regulation 18 consultation.

Settlement		Identified Level of Housing Growth	Potential Additional Level of Housing Growth	Total Potential Housing Growth (Identified + Additional)
Bexhill	North	1,557	540	2,097
Bexhill	West	308	640	948
Bexhill	Urban	298	55	353
Total Growth		2,163	1,235	3,398

TABLE 2.2: BEXHILL DEVELOPMENT STRATEGY - HOUSING SUMMARY

2.12.4 In the context of the current housing crisis, the requirement must be met by utilising each and every suitable site for housing. We consider that RDC should seek to achieve the Potential Additional Level of Housing Growth, including our client's site at High House Farm, as a minimum.

2.13 Q58. WHAT ARE YOUR VIEWS ON THE POTENTIAL SITES IDENTIFIED IN THE DRAFT HELAA THAT COULD ACCOMMODATE MORE GROWTH IN BEXHILL?

- 2.13.1 Our client's site at High House Farm, Ninfield Road is assessed in the Housing and Economic Land Availability Assessment (HELAA) (April 2024) under reference BEX0132. In summary it is identified as 'potentially available' for an estimated 250 dwellings, with an anticipated timescale for development within 5 years, subject to further assessment or investigation. The Council therefore already holds information on the site, but for convenience, we repeat the main points below. Furthermore, these representations are supported by a Vision Document outlining our vision for the site, along with a comprehensive set of technical documents. These documents address the comments from the HELAA and advocate for allocating land at High House Farm to accommodate additional growth in Bexhill.

Location and Surroundings

- 2.13.2 The site occupies approximately 40 acres (16.1 hectares) and is situated within the proposed 'Live Well Locally' area on the northern side of Bexhill, in the vicinity of allocated and approved applications for residential development.
- 2.13.3 The site is located on the West side of the A269, with existing access off Ninfield Road. The site currently comprises an existing detached dwelling of 1960's construction on its frontage, and a vehicular track to the North of the dwelling providing access to an arrangement of at-cost farm buildings. The pasture land acreage sits beyond the house and agricultural buildings. A Public Right of Way (PRoW) – ref BEX/47/1 runs the length of the Northern Boundary, connecting the site to Peartree Lane and Bexhill Highwoods beyond.
- 2.13.4 The site is bound by Ninfield Road to the East, properties situated on Thorne Crescent and also Chestnut Meadows Caravan Park to the north, private houses, Ibstock brickworks and Bexhill cemetery to the south, and agricultural land to the West. Part of the site comprises a pocket of Ancient Woodland which directly abuts St Mary's Lane.

Proposed Development

- 2.13.5 As set out within the Vision Document prepared by Edge Urban Design, the vision for the site is to deliver a high quality, locally distinctive and sustainable addition to Bexhill-on-Sea. The new proposals will provide much needed market and affordable housing, generous public open spaces, recreation and play areas, enhanced areas of biodiversity and community infrastructure including new orchard planting, play space and recreational routes.
- 2.13.6 At this stage an indicative masterplan has been prepared in order to illustrate the type and scale of development envisioned on site. This is informed by detailed

technical investigations, site visits and desktop studies, and demonstrates that that the site can comfortably accommodate around 250 dwellings. A range of homes would be delivered, with a balance of tenures and sizes to meet local needs, whilst respecting the character of the local vernacular. The proposed density varies across the site, from 38dph in the east, to 30dph in the west, aligning with the existing settlement pattern and topography of the site.

- 2.13.7 Green and blue corridors protect and enhance existing tree lines and hedgerows, linking to a variety of open spaces. Community focused facilities, such as an area of play and orchard, will be provided to serve the new and existing community. The landscaped site edges are enhanced with multifunctional green space, drawing landscape into the heart of the site.
- 2.13.8 A well connected network of routes for pedestrians, cyclists and vehicles will link to the existing network of footpaths and streets, with connections to public transport, encouraging healthy lifestyles and sustainable travel.

Wider Strategic Justification

- 2.13.9 According to the HELAA, the site could potentially be suitable for a major residential-led scheme in principle, to link to already committed and potential additional development further east, focused around Haven Brook Avenue. Moreover, it was considered favourably within Rother's Strategic Housing Land Availability Assessment (SHLAA) 2013 Review Part 2, whereby it was identified as a preferred 'Broad Location' area (reference BX109).
- 2.13.10 The site is situated within the proposed 'Live Well Locally' area on the northern side of Bexhill, near other allocated and approved residential development applications. According to the Draft Plan, growth will be focused here to consolidate it as the most sustainable town. In this regard, the development is located within suitable walking distance of a number of services and facilities, including a supermarket, convenience store, GP and post office, with Thorne Crescent bus stop within 100 metres of the site entrance.
- 2.13.1 In light of the significant local need for housing (including affordable), as well as the evidence of significant unmet housing needs in nearby and neighbouring authorities, it is necessary for the Draft Plan to meet its housing objective in full, as consistent under delivery could exacerbate the current housing and affordability crisis. Therefore, given the current planned shortfall and the uncertainty surrounding the robustness of the Council's sources of supply, it is essential that opportunities on appropriately located sites, such as the land at High House Farm, are brought forward. The proposal would result in a meaningful addition to the supply of housing within the district through the provision of much needed dwellings.
- 2.13.2 As demonstrated in Figure 2.2, Rother is a highly constrained district and as a result, Bexhill is identified in the Settlement Study (2024) as the most suitable area for growth. Opportunities must be taken to utilise every suitable site for housing

and inevitably this will require the release of some less sensitive sites for development which in most cases, are likely to be situated at the edge of the settlement. This is reflected in paragraph 5.40 of the Draft Plan, which states that development on greenfield land will be necessary to meet local needs. Further justification is detailed below:

Landscape

- 2.13.1 According to the HELAA, the site is relatively enclosed in the landscape, with an area of ancient woodland in its eastern section. The full extent of the subject site was included in Rother's Strategic Housing Land Availability Assessment (SHLAA) 2013 Review Part 2 and was identified within a preferred 'Broad Location' area (reference BX109). Of note, the description extract relevant to the site is as follows:

"West of A269 - This area (as highlighted through the Landscape Assessment) are undulating south facing slopes, which are framed by a good ridge-top tree belt to the north. The area is generally well screened from wider views, although it would benefit from additional tree cover in order to enhance the landscape character. The lay of the land helps to contain the area in wider views, although the closer to the brickworks, the more visually exposed the site becomes."

- 2.13.2 A further decade of tree growth since the 2013 SHLAA reporting has only further assisted a strong degree of enclosure preventing views from beyond. The Landscape Visual Appraisal (LVA) prepared by LDA Design confirms that this, in combination with the undulating landform, limits visibility between the site and its surroundings.
- 2.13.3 LDA Design has considered the ability of the site and its surroundings to accommodate new residential development, identified where opportunities and constraints exist from a landscape/visual perspective, and how potential impacts could be minimised through a sensitive design response. Consequently, the landscape strategy prioritises preserving and enhancing existing vegetation onsite, ensuring the new development integrates within its surroundings. Particular attention would be given to parts of the site that contain key landscape features or are more visible from the site's surroundings, ensuring the development can be well integrated. Longer range views are expected to be limited and where visible, the proposed development will appear as part of the broader Bexhill settlement.
- 2.13.4 Therefore, it is considered that the site can readily accommodate a sensitively designed development whilst respecting the wider countryside setting without harm to landscape visual impact.

Highways and Access

- 2.13.5 The HELAA recognises that additional technical work is required to determine whether a safe vehicular access can be achieved via Ninfield Road. As such, an

indicative design is included within the enclosed Transport Technical Note, which has been the subject of initial pre-application engagement with East Sussex County Council (ESCC) Highways. As part of the access design, it is proposed that Ninfield Road would be slightly realigned along the site frontage, with an uncontrolled pedestrian crossing and footways on both sides of the carriageway.

- 2.13.6 Additionally, the HELAA suggests that any development would need to include significant improvements to accessibility including pedestrian, cycle and public transport links to services in Sidley and Bexhill. A review of the existing local pedestrian, cycle and public transport infrastructure has demonstrated that the site is afforded the opportunity for many everyday journeys to take place by active and sustainable travel modes, with a range of local services and facilities located within a reasonable walking and cycling distance in Sidley and Bexhill. It is noted that there are opportunities to enhance this infrastructure as part of the proposed development, including the installation of a shared footway / cycleway on the eastern side of Ninfield Road, which would extend to the existing pedestrian and cycle infrastructure alongside the A2691 Haven Brook Avenue.
- 2.13.7 In summary, it has been demonstrated that the site represents a viable and sustainable location for developments in transport planning terms.

Heritage

- 2.13.8 The Grade II Listed High House lies to the north of the proposed access. This is a late 18th-century or early 19th-century dwelling. Whilst 20th-century mapping suggests a possibly associated farm complex within the site, the earliest available information suggests that the landholding associated with the asset was limited to a relatively small plot extending to the north. The frontage of the site and the proposed enhancement of the existing access can be sensitively designed to positively respond to and enhance the setting of the listed building.
- 2.13.9 All of the extant farm buildings within the site post-date the mid 20th century, and are not considered to be curtilage Listed. The dwelling on the frontage of Ninfield Road within the site is not of historic interest. Their proposed removal in place of a tree lined entrance, sensitive landscaping and quality materials can make a positive contribution to setting.
- 2.13.10 In conclusion, if development were established within the site in line with the emerging masterplan, it would cause only less than substantial harm at the lower end of the spectrum.
- 2.13.11 With regards to archaeology, a Roman ditch and other, undated features were recorded during evaluation works north of the site at Chestnut Meadow Caravan and Campsite. There is no current evidence to suggest that remains of a significance that would represent a constraint to development. The archaeological potential would be further investigated through such works as desk-based assessment and geophysical survey, to inform the planning application and allow an appropriate mitigation strategy to be formulated.

Ecology & Biodiversity

- 2.13.12 There are no ecological constraints on site which would prevent the site from being developed. Nevertheless the intention will be to achieve Biodiversity Net Gain including through on-site enhancements. The necessary ecological surveys will be carried out and will inform an ultimate planning application on the site.

Drainage

- 2.13.13 According to the HELAA, there is a small area at risk of surface-water flooding within the western section. The scheme will be informed by the necessary drainage and flood risk surveys and will incorporate appropriate blue infrastructure including SuDS accordingly. Surface water drainage will be managed through the proposed drainage infrastructure.
- 2.13.14 Given that the site is located within the Pevensey Levels Hydrological Catchment Area, surface water will pass through at least two stages of treatment before discharging from the site.
- 2.13.15 Flooding and drainage matters are not considered a constraint to development on this site.

Noise & Air Quality

- 2.13.16 Noise is not considered to be a constraint to development. Ninfield Road on the western boundary is likely to be the main noise source, however effects are expected to be localised and unlikely to require mitigation.
- 2.13.17 We are aware of the brickworks and quarry adjacent to the south-west boundary of the development and the potential impact of the quarrying works has been considered. The quarry operators are required to mitigate the impact of their work on the adjacent sensitive receptors, particularly in respect of noise, air quality and land stability. However, a further precautionary offset has been provided as part of the proposed development plan which will mitigate any residual impacts.

Deliverability

- 2.13.18 The site is considered to comprise a logical extension to the already allocated sites in Northern Bexhill, served well by the new road infrastructure in this part of the town. Catesby Strategic Land Ltd have a legal interest in the site and this reflects the landowner's willingness to make the land available for development. There are no known viability issues, legal or third-party constraints present and there are no impediments to the site being allocated for development commencing early within the Plan period.

Summary

- 2.13.19 Given the clear consistency of our client’s site with the proposed growth strategy and the established nature of north and west Bexhill as a suitable location for housing, we submit that the land at High House Farm is suitable to accommodate a proportionate level of growth to assist in meeting the housing need within the emerging Plan period. Moreover, it is clear the proposal would not form an isolated standalone development, and that it would form part of a well-connected and sustainable community.
- 2.13.20 In light of the above, it is clear that potential site BEX0132 identified in the draft HELAA can accommodate more growth in Bexhill.

2.14 Q76. WHAT ARE YOUR VIEWS ON THE DISTRICT-WIDE DEVELOPMENT POTENTIAL FOR THE LOCAL PLAN UP TO 2040 WHICH IS PRESENTED IN 4, 35 AND 36?

- 2.14.1 The Councils’ housing supply components are consolidated in Table 2.2 and set a housing target of between 5,158 and 7,287, representing a shortfall of up to 9,582 dwellings.

Source of Housing Supply	Total Dwellings
Constructed 1 April 2020 – 31 March 2023	802
Known completions and commencements on large sites since 1 April 2023	340
With Planning Permission	1,693
DaSA and Neighbourhood Plan allocations without permission brought forward	1,660
Additional HELAA potential sites	2,129
Windfall projection (across the district)	663
Total Range	5,158 - 7,287

TABLE 2.2: PROPOSED SOURCES OF HOUSING SUPPLY

- 2.14.2 Neither the Housing Background Paper (April 2024) nor the Development Strategy Background Paper (April 2024) contain any evidence to support these figures, particularly in relation to known completions and sites with Planning Permission. Based on the level of information available, it is therefore difficult to determine with any level of certainty whether the purported supply is reliable and how this relates to the NPPF definition of being deliverable. The Council should make it clear

through its evidence base how these units have been counted towards the overall supply in order to ensure the Plan is “justified” (NPPF, paragraph 35).

- 2.14.3 Furthermore, it cannot be assumed that each one of these sites with Planning Permission will come forward either in part or in full. For instance, consents can lapse or the full development potential of a site may not be achieved, for example, Reserved Matters consent is granted for fewer homes than consented under an Outline permission. Based on previous delivery rates, a non-implementation rate must therefore be applied, allowing for an element of under-implementation.
- 2.14.4 We note that the list of sites relied upon include a number of long-standing allocations from the DaSA (2019) which have not yet delivered. Many of these in multiple ownerships and that have since stumbled in terms of ‘availability’. The legacy of these sites not being brought forward requires a caution approach to be adopted.
- 2.14.5 The suitability of relying on vague developer statements was recently addressed during consideration of appeal Ref: APP/Q3115/W/20/3265861 for Little Sparrows, Sonning Common, Oxfordshire where the Inspector offered clear findings on the benchmark level of evidence required to meet the deliverability tests of the PPG. The Inspector concludes evidence of deliverability requires more than just being informed by landowners, agents or developers that sites will come forward.
- 2.14.6 Accordingly, if the identified sites are to be relied upon in the final plan it will require a substantial and robust extent of evidence in order to ensure the Plan is “justified” (NPPF, paragraph 35).

2.15 Q77. DO YOU AGREE WITH THE PRINCIPAL IDENTIFIED BY THE COUNCIL OF ACHIEVING A STEPPED HOUSING DELIVERY WITH GREATER LEVELS OF DELIVERY PLANNED FOR LATER IN THE PLAN PERIOD?

- 2.15.1 The Council acknowledges that a significant step change in housing delivery is required in order to deliver a significant uplift compared to current and historic delivery rates. As a result, it proposes to deliver a stepped increase in housing delivery with a greater amount of development coming forward towards the end of the planning period.
- 2.15.2 Notwithstanding this, the proposed number of dwellings to 2040 is only just sufficient to cover Rother’s current five-year housing land supply (as at 1 April 2023). Therefore, we are concerned that a stepped approach will result in an even greater undersupply of homes in the short to medium term, leaving an overall gap in provision against assessed needs within the district across the entire Plan period.
- 2.15.3 In accordance with paragraph 69(a) of the NPPF, planning policies should identify a supply of specific, deliverable sites for years 1 to 5 of the plan period following the intended date of adoption. In plan-making, the Inspector examining the plan

will test the evidence to ensure that the 5 year housing land supply identified in strategic policies is sound. The housing crisis means that additional housing is required now, and if RDC do want to plan for a stepped trajectory, they will need to be able to present strong evidence to justify why this is necessary.

- 2.15.4 As aforementioned, the site is deliverable in a single land ownership with no known viability issues, legal or third-party constraints present and there are no impediments to the site being allocated for development commencing within years 1-5 of the plan.

2.16 Q114. WHAT ARE YOUR VIEWS ON THE COUNCIL'S PROPOSED POLICY ON MIXED AND BALANCED COMMUNITIES?

- 2.16.1 Policy HOU1 sets out the Council's preferred housing type and mix for both market and affordable homes. According to this policy, in all housing developments that include market housing, at least 30% of the market housing shall comprise one- and two-bedroom dwellings.
- 2.16.2 It is important that this policy recognises that housing needs change over time and a desired mix in 2024 will very unlikely reflect the needs in subsequent years. Whilst it is considered that this policy reflects this, the policy should make it absolutely clear that private mix should be dictated by the market.

2.17 Q116. WHAT ARE YOUR VIEWS ON THE COUNCIL'S PROPOSED POLICY ON AFFORDABLE HOUSING?

- 2.17.1 To meet the district's need for affordable housing, all qualifying housing developments delivering 10 or more units, or proposals for 6 or more units within the High Weald National Landscape, or sites of 0.5 hectares or more, will be required to provide on-site affordable housing. At this stage, the minimum percentage has not been set out and will be informed by viability analysis, to be completed following the Regulation 18 Consultation on the Local Plan.
- 2.17.2 The policy sets out the indicative tenure mix for affordable housing as follows:
- 25% First Homes (where required in accordance with national policy);
 - 58% Social/ Affordable Rented;
 - 17% Other Affordable Home Ownership.
- 2.17.3 As stated in response to question 114, it is important that this policy recognises that housing needs change over time and a tenure mix in 2024 will very unlikely reflect the needs in subsequent years. Therefore, the policy must allow flexibility to account for market conditions. Onerous or inflexible affordable requirements

can prejudice a site's viability and accordingly it is essential that the viability of the proposed policy is carefully assessed.

- 2.17.4 Additionally, although initially introduced by a WMS in May 2021 and briefly referenced in paragraph 6 and footnote 36 of the NPPF, the requirement for First Homes is not mandatory. The policy should recognise that it is not to be applied in a blanket fashion, and that its place in the statutory scheme of things is as a material consideration and no more.

2.18 Q131. WHAT ARE YOUR VIEWS ON THE COUNCIL'S PROPOSED POLICY ON SPECIALIST HOUSING FOR OLDER PEOPLE?

- 2.18.1 It is agreed that there is a pressing need for the provision of specialist housing, as part of the overall Local Housing Need for Rother. This reinforces our comments within these representations about the importance of the Local Plan meeting the Local Housing Need in full. The housing market will ensure that mixed tenures will be delivered and therefore a greater total number of dwellings will deliver a greater provision of specialist housing.
- 2.18.2 We would anticipate that specialist housing is likely to come forward on specific sites, delivered by retirement and care operators and informed by demographic and locational evidence. This can be planned through specific site allocations within the next iteration of the draft Local Plan.
- 2.18.3 We note that policy HOU8 requires all dwellings to meet M4(2) Category 2 standards, and for 5% of new market housing to meet M4(3) "wheelchair adaptable dwellings" standards, on sites of 20 or more dwellings. This will deliver a significant quantum of accessible, adaptable and wheelchair adaptable dwellings dispersed across the district within site allocations. It is therefore questionable whether the requirement set out within draft policy HOU9 for at least 10% of the total number of dwellings within developments of 100 or more dwellings to be specialist housing for older people, is justified or appropriate. The delivery of specialist housing will come forward in appropriate locations informed by demographic evidence. It is therefore important that any general requirement for a specific percentage to be applied on all sites is properly justified and not overly prescriptive.

3 CONCLUSION

3.1 REPRESENTATION SUMMARY

- 3.1.1 This representation has been prepared on behalf of Catesby Strategic Land Ltd and Rurban Estates Limited in response to the Rother Draft Local Plan (Regulation 18) Consultation, which runs until 23rd July 2024.
- 3.1.2 Catesby and Rurban are supportive of the encouraging aims and aspirations with regard to growth around Bexhill which reflects the settlement's status at the most sustainable settlement (by some margin) in Rother. Indeed, we support many of the aspirations underpinning the "Live Well Locally" priority, particularly the indication that the site at High House Farm (BEX0132) is a potential Live Well Locally area and a Potential Development Growth Area.
- 3.1.3 For the reasons set out in this Statement, we do have concerns that the overall strategy proposed would not evolve to a sound plan. As the current draft does not provide potential specific site allocations, this is not a major concern at this stage but it is imperative that the next draft Local Plan properly plans to meet the Local Housing Need requirement as a minimum. This will require the allocation of a substantial number of potential housing sites.
- 3.1.4 Given the increasing need for additional housing over the Plan period, we consider that the land at High House Farm should be included as a future housing allocation and continue to form part of the Council's housing evidence base used to inform the emerging Local Plan.
- 3.1.5 Given the clear consistency of our client's site with the preferred growth strategy and the established nature of north and west Bexhill as a suitable location for housing, we submit that the land at High House Farm is relatively unconstrained and suitable to accommodate a proportionate level of growth to assist in meeting the housing target within the emerging Plan period.
- 3.1.6 I trust the contents of this representation are clear and I hope the comments are useful in guiding the forthcoming stage of the plan making process.