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## Rother Regulation 18 Local Plan Representation

**On behalf of Bellway Homes Ltd**

*In respect of Land at Turkey Road, Bexhill*

July 2024 - DHA/16152



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# CONTENTS

<b>1</b>	<b>INTRODUCTION .....</b>	<b>3</b>
1.1	PURPOSE OF THIS REPRESENTATION .....	3
	Plan Context .....	3
<b>2</b>	<b>REG 18 CONSULTATION BACKGROUND .....</b>	<b>5</b>
2.1	OVERVIEW .....	5
2.2	HOUSING CONTEXT .....	5
2.3	LOCAL PLAN REVIEW .....	6
2.4	LOCAL DEVELOPMENT SCHEME .....	7
<b>3</b>	<b>RESPONSE TO THE DRAFT LOCAL PLAN .....</b>	<b>9</b>
3.1	Q1. WHAT ARE YOUR VIEWS ON THE COUNCIL'S VISION? .....	9
3.2	Q2. WHAT ARE YOUR VIEWS ON PROPOSED TWIN OVERALL PRIORITIES TO BE 'GREEN TO THE CORE' AND 'LIVE WELL LOCALLY'? .....	9
3.3	Q3. WHAT ARE YOUR VIEWS ON THE KEY ISSUES THAT HAVE BEEN IDENTIFIED AND IS THERE ANYTHING SIGNIFICANT MISSING? .....	10
3.4	Q4. WHAT ARE YOUR VIEWS ON THE COUNCIL'S OBJECTIVES FOR THE LOCAL PLAN? ..	11
3.5	Q6. WHAT ARE YOUR VIEWS ON THE COUNCIL'S PROPOSED POLICY GTC1: NET ZERO BUILDING STANDARDS? .....	12
3.6	Q15. WHAT ARE YOUR VIEWS ON THE COUNCIL'S PROPOSED POLICY FOR HEAT NETWORKS? .....	13
3.7	Q20. WHAT ARE YOUR VIEWS ON THE COUNCIL'S PROPOSED POLICY FOR LOCAL NATURE RECOVERY AREAS? .....	13
3.8	Q22. WHAT ARE YOUR VIEWS ON THE COUNCIL'S PROPOSED POLICY FOR BIODIVERSITY NET GAIN? .....	14
3.9	Q28. WHAT ARE YOUR VIEWS ON THE AREA TYPES AND DENSITIES PROPOSED AS A KEY DRIVE TO LIVE WELL LOCALLY? .....	15
3.10	Q30. WHAT ARE YOUR VIEWS ON THE COUNCIL'S PROPOSED POLICY ON FACILITIES AND SERVICES? .....	16
3.11	Q51. WHAT ARE YOUR VIEWS ON THE COUNCIL'S PREFERRED SPATIAL DEVELOPMENT OPTIONS? .....	17
3.12	Q54. WHAT ARE YOUR VIEWS ON THE COUNCIL'S PROPOSED SPATIAL DEVELOPMENT STRATEGY AND PROPOSED MINIMUM TARGETS FOR HOUSING AND EMPLOYMENT GROWTH? .....	18
	Duty to Cooperate .....	20
3.13	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? .....	20
3.14	Q58. WHAT ARE YOUR VIEWS ON THE POTENTIAL SITES IDENTIFIED IN THE DRAFT HELAA THAT COULD ACCOMMODATE MORE GROWTH IN BEXHILL? .....	22
	Location and Surroundings .....	22
	Proposed Development .....	22
	Wider Strategic Justification .....	23
	Highways and Access .....	23
	Below Ground Archaeology .....	24

	Flood Risk and Drainage.....	24
3.15	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? .....	26
3.16	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?.....	28
3.17	Q114. WHAT ARE YOUR VIEWS ON THE COUNCIL’S PROPOSED POLICY ON MIXED AND BALANCED COMMUNITIES? .....	28
3.18	Q116. WHAT ARE YOUR VIEWS ON THE COUNCIL’S PROPOSED POLICY ON AFFORDABLE HOUSING? .....	28
<b>4</b>	<b>CONCLUSION.....</b>	<b>30</b>
4.1	REPRESENTATION SUMMARY .....	30

# 1 INTRODUCTION

## 1.1 PURPOSE OF THIS REPRESENTATION

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- 1.1.1 This representation is prepared on behalf of our client Bellway Homes Ltd in response to the Rother District Council (hereafter 'RDC') Local Plan (Regulation 18) consultation which closes 23rd July 2024.
- 1.1.2 We understand that RDC are in the process of preparing a new Local Plan to set out a strategy for development across the District for the period to 2040. The draft Local Plan has been prepared with two overall priorities 'Green to the Core' and 'Live Well Locally' which emphasise the role of Planning on the environment and sets a goal to create healthy, sustainable, and inclusive communities.
- 1.1.3 With these two overall priorities in mind, RDC are seeking views on the Draft Local Plan which includes proposed strategic Policies relating to the distribution and delivery of housing, employment floorspace, community facilities, and supporting infrastructure across the District.
- 1.1.4 Bellway Homes Ltd control 3.89 hectares of land at Turkey Road, situated on the northwestern extent of Bexhill (hereafter '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).
- 1.1.5 This Report therefore considers the Draft Policies of the Plan, whilst assessing the Planning case for Land at Turkey Road as a potential housing allocation.
- 1.1.6 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.

### Plan Context

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- 1.1.7 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.*

1.1.8 Having considered the content of the current consultation document, the evidence and the assumptions that underpin the draft Local Plan, 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.

1.1.9 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 REG 18 CONSULTATION BACKGROUND

### 2.1 OVERVIEW

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- 2.1.1 RDC are required to prepare a new Local Plan, as the current suite of Development Plan documents which comprise the Core Strategy and the Development Site Allocations Local Plan were adopted in September 2014 and December 2019 respectively.
- 2.1.2 The Development Plan documents, and the Policies contained within, pre-date current National Planning Policy, Planning Practice Guidance, and local evidence. Consequently, these documents require updating in accordance with National Planning Policy Framework (NPPF) Paragraph 33 which requires Policies to be reviewed at least once every five years.

### 2.2 HOUSING CONTEXT

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- 2.2.1 In terms of housing, the adopted Development Plan Policies have consistently failed to address the housing needs of the District. The 2014 Core Strategy was tasked with a 29% uplift in housing growth (i.e., + 1,380 new homes) compared to that required under the South East Plan, equating to a total of 6,180 new homes. However, the adopted housing target was eventually reduced to 5,700 homes with the Council citing the cancellation of major infrastructure capacity upgrades on the A21 and Hastings to Ashford railway line, as well as the major District constraints of the High Weald AONB (now National Landscape), International and National Nature Conservation Sites and low-lying areas of flood risk as justification for the reduced target.
- 2.2.2 As a result of the Development Plan now being more than five years old, in the absence of an up-to-date Plan, the Council are required to use the Standard Methodology derived housing need figure of 737 dwellings per annum. The uplifted figure is more than 100 dwellings greater than the previously adopted target, notwithstanding this, recent housing delivery (i.e., since 2011 / 2012) within Rother has seen built-out rates of 204 dwellings per annum (in accordance with the Hastings and Rother Housing and Economic Development Needs Assessment, February 2024). The Council's latest Housing Delivery Test (HDT) Result of 41% (DLUHC and MHCLG, December 2023) equates to the delivery of 661 dwellings over the three-year monitoring period, or just 220 dwellings per annum.
- 2.2.3 In terms of housing supply, the Council's latest published position (December 2023) is 3.09 years and represents only a very modest improvement over the 2.79 years identified the year prior. Even when measured against the Core Strategy target, the position would remain just 3.69 years.

2.2.4 In this regard, it is therefore vital that the Local Plan review is undertaken and puts in place a robust and ambitious strategy for growth that is genuinely capable of delivering the substantially increased quantum of housing growth that is urgently needed by the District's current and future residents.

## 2.3 LOCAL PLAN REVIEW

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2.3.1 RDC are consequently now in the process of preparing a new Local Plan to set out a strategy for development for the period to 2040.

2.3.2 As noted previously, the Draft Local Plan has been prepared with two overall priorities 'Green to the Core' and 'Live Well Locally' which emphasise the role of Planning on the environment and set a goal to create healthy, sustainable, and inclusive communities through the delivery of ten further strategic objectives:

- 1) Deliver net zero carbon ambitions through effective and supportive planning policies.
- 2) Maximise opportunities for nature recovery and biodiversity net gain and preserve the historic landscape character of the High Weald National Landscape and protected habitat areas of Rother and ensure sensitive development that allows communities to thrive.
- 3) Promote high quality design and protect and enhance Rother's built and natural heritage, while providing opportunities for recreation and tourism.
- 4) Respond to the housing crisis and help facilitate the delivery of housing to meet the needs of different groups in the community, ensuring a variety of high-quality, sustainable, zero carbon ready dwellings that meet the needs and income levels of Rother's wider population for their lifetime.
- 5) Deliver sustainable growth and regeneration in Bexhill and its edges, along with Hastings Fringes, with supporting infrastructure, contributing to the needs of the wider housing and economic market area.
- 6) Create economic prosperity, both in rural and urban locations, meeting the employment needs of the wider population, improving the quality and variety of jobs, and being flexible to the changing needs of the economy.
- 7) Focus growth in sustainable locations across the district, or places that can be made sustainable through supporting infrastructure and community facilities.
- 8) Enhance the sustainability and connectivity of local communities through sustainable transport measures and improved internet network coverage.

- 9) Support and achieve safe, healthy, vibrant and mixed communities where the physical and mental health of residents is a high priority. Create high standards of inclusivity and accessibility to shared facilities for all the district’s residents.
- 10) Balance strategic planning with the opportunities for local delivery through neighbourhood planning.

2.3.3 The delivery of the objectives leads to the creation of the Local Plan’s development strategy for both the whole District and five sub-areas within it. It proposes a distinct strategy focussed on networks and clusters of Towns and Villages to respond to the twin priorities.

2.3.4 The Local Plan is intended to be supported at the local level by Neighbourhood Plans, which give communities the power to develop a shared vision for their local area and set specific Policies within the context of the Local Plan’s strategic Policies. At present there are seven adopted Neighbourhood Plan in the District, and the Council intended to work closely with neighbourhood planning groups in the drafting of this Plan and will continue to support Neighbourhood Plans alongside the Local Plan review.

## 2.4 LOCAL DEVELOPMENT SCHEME

2.4.1 The Council’s latest Local Development Scheme (LDS) published in March 2024 outlines the delivery timetable of the emerging District Local Plan and relates to the period February 2024 – February 2027.

2.4.2 The March 2024 LDS sets out that the evidence base gathering process will run until early 2025. The first Call for Sites exercise concluded in October 2020 and was used to inform the Draft Housing and Economic Land Availability Assessment published in April 2024.

2.4.3 The Regulation 18 consultation is now taking place broadly as scheduled and forms the first meaningful opportunity for respondents to provide detailed submission material and commentary on the development strategy. The Call for Sites process has also been re-opened during the course of the Regulation 18 consultation and invites the submission of new Sites for assessment through the next iteration of the HELAA.

2.4.4 On this basis, the Council has set out the following targets within their LDS:

REGULATION	STAGE OF LOCAL PLAN PREPARATION	TARGET DATE
-	Evidence Gathering	Q1 – 2024 / 2025 (ongoing)
<b>18</b>	Draft Plan Consultation	Q1 2025 / 2025
<b>19</b>	Pre-submission Consultation	Q1 2025 / 2026
<b>22</b>	Submission	Q2 2025 / 2026



<b>24</b>	Examination	Q4 - 2025 / 2026 to Q1 - 2026 / 2027
<b>26</b>	Adoption	Q3 - 2026 / 2027

TABLE 2.1: SUMMARY OF LDS

2.4.5 In view of the above, it is noted that the Council are currently undertaking their Regulation 18 consultation, for which this submission is made.

## 3 RESPONSE TO THE DRAFT LOCAL PLAN

### 3.1 Q1. WHAT ARE YOUR VIEWS ON THE COUNCIL'S VISION?

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3.1.1 According to the Vision contained within consultation document, by 2040:

*"The needs of all the local community will be met, with an emphasis on enhanced health and wellbeing for now and into the future. Bold solutions will have successfully addressed the climate and biodiversity emergencies and the housing crisis".*

3.1.2 We agree with the Vision in principle and strongly welcome the decision to place addressing the housing crisis at the forefront of the Plan. The Core Strategy 2014 notably refers to meeting local needs, but does not explicitly refer to housing, nor put the extent of the need in such strong terms.

3.1.3 It cannot be ignored that the adopted Development Plan has ultimately fallen substantially short in its ambition to meet the needs of communities and did so from the very start.

3.1.4 However, whilst the recognition of the housing crisis within the Vision is a positive initial step, it must be backed by a suite of ambitious and robust Policies capable of delivering the contents of the Vision on the ground and providing tangible change for the District's current and future residents currently grappling with the extent of the housing need shortfall in Rother.

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

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3.2.1 The consultation document asks respondents to comment on the extent to which they agree with the overall vision and objective of the Local Plan.

3.2.2 The Vision is 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. Whilst 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.

3.2.3 In this regard, it is highlighted that the housing crisis is acute within Rother and a 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 the full extent of the 'Live Well Locally' areas are clearly set out at the next stage to specifically confirm that it will be the aim of the Council to address the housing crisis, meeting the Local Housing Need in full and maximising housing delivery.

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

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3.3.1 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.

3.3.2 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'.

Notwithstanding this, we welcome the recognition of the housing need within with 10 key issues.

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

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- 3.4.1 The Draft Local Plan sets out ten strategic spatial objectives, which will be used to support and deliver sustainable development.
- 3.4.2 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 refer to the housing situation as a crisis. We do however question the validity of inferring that there is a matter of choice about the delivery of housing and economic needs, in light of the clear legal requirement of the Plan to meet social and economic needs.
- 3.4.3 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.
- 3.4.4 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 District'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 [...]"*
- 3.4.5 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.
- 3.4.6 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.
- 3.4.7 Notwithstanding this, 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 deliver of development on these sites can be positively planned.

### 3.5 Q6. WHAT ARE YOUR VIEWS ON THE COUNCIL'S PROPOSED POLICY GTC1: NET ZERO BUILDING STANDARDS?

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3.5.1 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 goes beyond the minimum standards provided by the Building Regulations.

3.5.2 On 13<sup>th</sup> December 2023, a Written Ministerial Statement advised that whilst 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, advising 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)."*

3.5.3 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.

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

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- 3.6.1 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. The supporting text refers to existing building heat density and the presence of large, non-residential buildings with sufficient heat demand to act as anchor loads. Accordingly, it would appear that this Policy is intended to be direct at projects within central Bexhill rather than new developments on the edge of Bexhill.
- 3.6.2 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.
- 3.6.3 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" in accordance with NPPF Paragraph 35.

### **3.7 Q20. WHAT ARE YOUR VIEWS ON THE COUNCIL'S PROPOSED POLICY FOR LOCAL NATURE RECOVERY AREAS?**

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- 3.7.1 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.
- 3.7.2 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.

### 3.8 Q22. WHAT ARE YOUR VIEWS ON THE COUNCIL'S PROPOSED POLICY FOR BIODIVERSITY NET GAIN?

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- 3.8.1 We note that under Draft Policy GTC8, all qualifying development proposals must deliver at least a 20% measurable Biodiversity Net Gain. 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.
- 3.8.2 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).
- 3.8.3 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 Draft 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
- 3.8.4 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 on allocated sites.
- 3.8.5 The Council have themselves stated the limited land availability being brought forward and are currently suggesting that less than half of their total housing need is capable of being delivered. In this regard, it would be disingenuous to suggest that there is plentiful land availability to deliver off-site Net Gain.
- 3.8.6 Consequently, at this stage we extremely concerned that Draft Policy GTC8 is not underpinned by appropriate evidence, including that the approach taken will be viable, and is therefore not "justified" in accordance with NPPF Paragraph 35. Alternatively, the Draft Plan could 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.



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

3.9.1 Proposed Policy LWL1 sets out minimum densities for different areas, as defined by Rother’s Density Study (April 2024):

- 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; and
- Village areas (with development boundaries): 25-45 dph.

3.9.2 In the first instance, it is not clear from the Density Study 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.

3.9.3 Notwithstanding the above, Figure 2.1 below, comprises an extract from the Draft Plan which shows how the area types proposed by Draft Policy LWL1 could be spatially defined. ‘Live Well Locally’ area types are likely to relate to the proposed growth areas in North and West Bexhill.

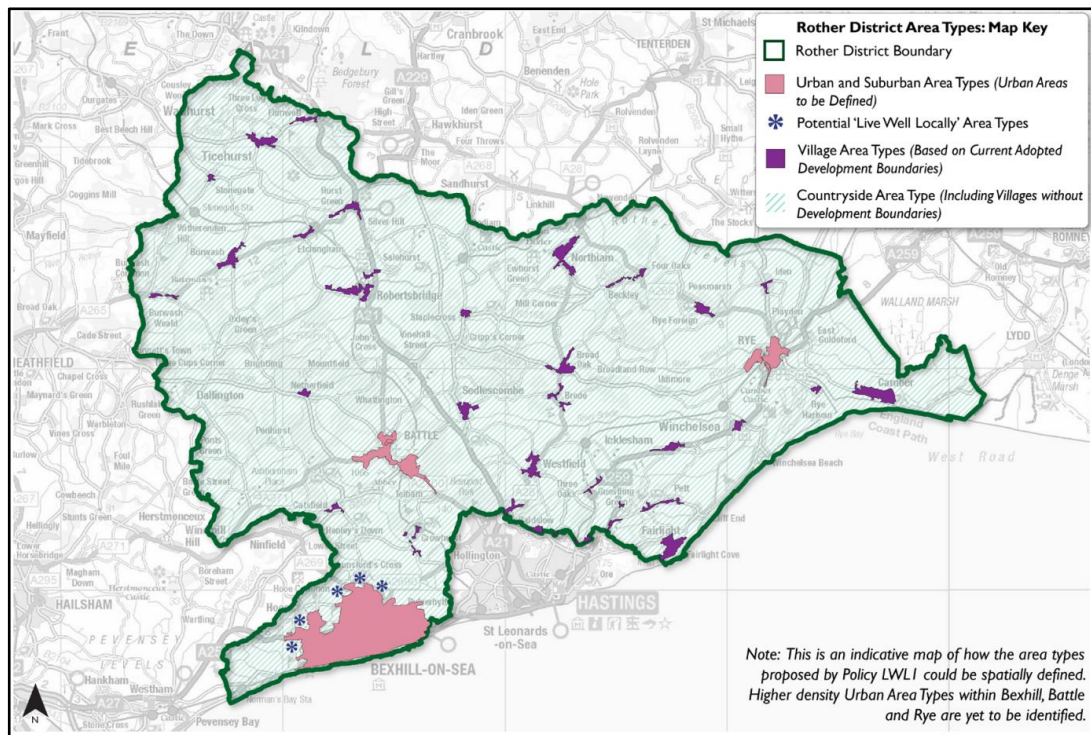


FIGURE 3.1: EXTRACT OF DRAFT LOCAL PLAN FIGURE 8: PROPOSED DENSITY AREAS



- 3.9.4 We are however concerned that the densities for all areas appear very high and we question the practicality even in the urban areas of consistently delivering 60 dph as a minimum figure and 90 dph as an upper figure. In rural areas, typically washed over by the High Weald National Landscape achieving even the minimum 45 dph and 25 dph densities may simply not be achievable from a design perspective.
- 3.9.5 We therefore suggest that an emphasis on sourcing additional sites, alongside expanding existing sites is made a priority before relying on very high-density development to address the shortfall. Indeed, our client's Site Land at Turkey Road should be considered as a 'Potential Development Growth Area' for North Bexhill. Notwithstanding this, we highlight that RDC's HELAA highlights that the Site has capacity for 50 dwellings across 3.89 hectares (i.e., 12.85 dph) which is significantly below that of those proposed density for Live Well Locally Areas.

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

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- 3.10.1 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.
- 3.10.2 This Draft 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.
- 3.10.3 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 with 800m of *"a mix"* of local amenities. Cited examples include a food shop, park, primary school, post office and a GP surgery. Flexibility must be provided so as not to preclude sustainable developments which do not meet the stringent test set out at proposed Policy LWL2. This is particularly important in the context of the current acute housing need in Rother.
- 3.10.4 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.

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

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3.11.1 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).

3.11.2 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 3.2 below, 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.

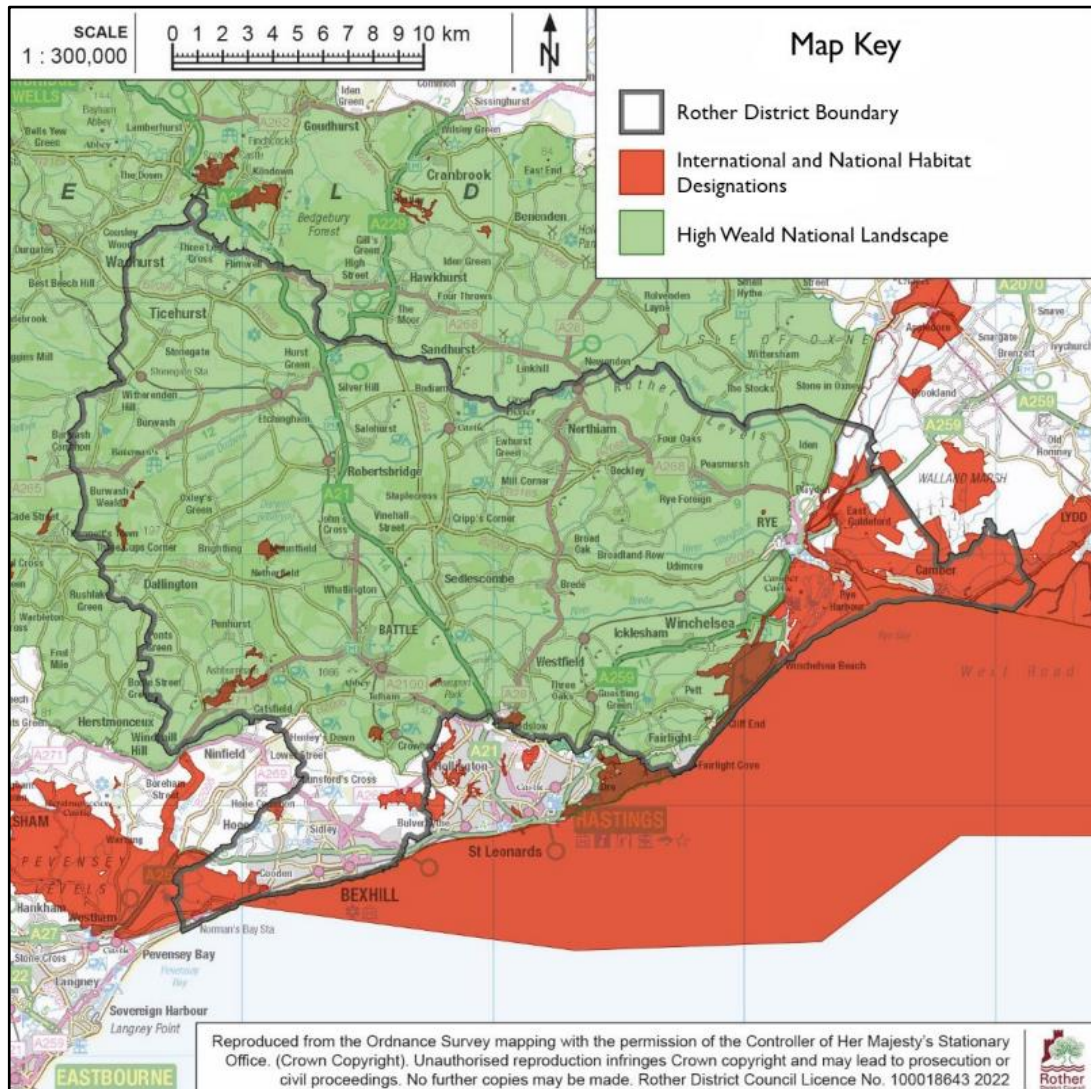


FIGURE 3.2: EXTRACT OF DRAFT LOCAL PLAN FIGURE 4: PROTECTED LANDSCAPE AND ENVIRONMENTAL DESIGNATIONS

3.11.3 In this regard, Bexhill has been identified in the Settlement Study (April 2024) as the most sustainable settlement for growth. Consequently, the opportunity must be taken to utilise every suitable site for housing, which 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.

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

3.12.1 It is the expectation that Local Planning Authorities will plan to meet their full assessed need, as required by the NPPF (Paragraph 11(b) and Paragraph 23),

supporting the Government’s objectives to significant boost the supply of homes (NPPF, Paragraph 60).

- 3.12.2 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.
- 3.12.3 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. As drafted the Plan falls grossly short of the genuine need and a shortfall of more than 50% is likely to be found unsound on the basis of not being positively prepared, given the lack of evidence to suggest such a low target.
- 3.12.4 As evidenced in Table 3.1 below, 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).

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 3.1: SUMMARY OF HISTORIC HOUSING DELIVERY IN ROTHER

- 3.12.5 It is clear therefore, that the proposed minimum targets for housing growth do not meet the local need for all forms of housing.
- 3.12.6 It is acknowledged that the present target is a draft target and is largely a function of the limited supply of identified land within the HELAA. We understand that the Council are running a Call for Sites alongside the Regulation 18 consultation in anticipation of preparing an updated HELAA prior to the publication of the final Plan, in the hope of identifying additional sites.

- 3.12.7 It is however reiterated that in its current form, the Plan falls significantly short of meeting its targets such that it will likely be found unsound. Consequently, it is imperative that additional sites are identified, alongside the capacity of existing sites being reviewed in order to more appropriately address the Local Housing Need and to match the 'bold' and 'ambitious' vision of the Plan.

### Duty to Cooperate

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- 3.12.8 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).
- 3.12.9 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.
- 3.12.10 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.

### 3.13 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?

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- 3.13.1 Rother's proposed development strategy has been split into five spatial sub-areas, each with their own vision statement and identified distribution of development.
- 3.13.2 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 seeks to locate development on the northern and western edges of the built-up area of Bexhill to create new compact, connected communities. The Potential Development Growth Areas for North Bexhill and West Bexhill are shown below in Figure 3.3, with our clients Site shown approximately in red.





TABLE 3.3: BEXHILL SUB-AREA

3.13.3 It is unclear what the asterisks are supposed to denote and the extent of the likely broad locations around them. It would be concerning if the Draft Local Plan fails to recognise the inherent sustainability of the site at Turkey Road (BEX0112) and its suitability for housing growth. In this instance, it is highlighted that the Site should form one of the North Bexhill Potential Development Growth Areas (i.e., Live Well Locally Areas).

3.13.4 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 as shown in Table 3.2 below. 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 3.2: BEXHILL DEVELOPMENT STRATEGY – HOUSING SUMMARY

3.13.5 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 Land at Turkey Road, as a minimum.

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

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3.14.1 Our client's Site at Land at Turkey Road, is assessed in the Housing and Economic Land Availability Assessment (HELAA) (April 2024) under reference BEX0112. In summary it is identified as a potential site for an estimated 50 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.

#### **Location and Surroundings**

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3.14.2 The Site occupies approximately 3.89 hectares and is situated immediately adjacent to the 'Areas of Built Form' in the northwest of Bexhill, in the vicinity of existing and planned residential development (in the form of the Adopted Development and Site Allocations Local Plan Policy BEX6: Land Adjacent to 276 Turkey Road, Bexhill).

3.14.3 The Site is located on the north side of Turkey Road, with the existing access off Turkey Road, immediately adjacent to the BEX6 Site Allocation. This access currently provides access to numbers 270, 272, and 274 of which rights of access would remain. The Site is currently undeveloped land and comprises stables, grassland paddocks, scrubland, and a central tree belt.

3.14.4 The Site is bound by built form on all sides, with residential properties to the northeast and south, Bexhill Cemetery to the north, and the Ibstock Ashdown Brickworks and Quarry to the west. The Site is additionally enclosed by mature planting across its western and eastern boundaries, however, there are no known Tree Preservation Orders (TPO) on Site.

#### **Proposed Development**

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3.14.5 The Site has capacity to provide for the 89no. dwellings as referred to within the HELAA. This Site capacity has been constraint led and therefore enables sufficient mitigation from the neighbouring Brickworks can be implemented to ensure that that existing operations would not harm residential amenities of future occupiers, nor would it restrict future economic growth of the Brickworks.

- 3.14.6 Within this, two large high-quality areas of publicly accessible open space are proposed, inclusive of providing a Local Area of Play. The approach has additionally ensured the reinforcement of boundary landscaping and increased opportunity for significant ecological enhancement.

### Wider Strategic Justification

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- 3.14.7 The Site is situated immediately adjacent to the settlement boundary of Bexhill, in close proximity to one of the proposed 'Live Well Locally' areas on the northern side of Bexhill. Notwithstanding this, the Site is near planned development (in the form of an allocated Site) and existing residential development. According to the general thrust of the Draft Plan, growth should additionally be focussed in this location to assist in consolidating Bexhill as the most sustainable town.
- 3.14.8 In light of the significant local need for housing (including affordable), as well as the evidence of significant unmet need for housing (including affordable) 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 Land at Turkey Road, 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.
- 3.14.9 As previously highlighted under Figure 3.2, 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. There the opportunity 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 (such as our client's Site). This stance is reflected in paragraph 5.40 of the Draft Plan, which states that development on greenfield land will be necessary to meet local needs.

### Highways and Access

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- 3.14.10 As part of the Refused Application, the Site was assessed by both National Highways and East Sussex County Council (ESCC) Highways who held no objection to the Application subject to securing necessary highways works securable via condition and transport contributions via Section 106 Legal Agreement. Indeed, in the Officer's Report to Committee, the scale of development as proposed on the Site was acceptable on Highways grounds.



### Below Ground Archaeology

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- 3.14.11 The Site is not located within an Archaeological Notification Area, however, during the determination of the Refused Application the ESCC Archaeologist advised that the location was of interest with evidence of past human activity from the prehistoric period onward. In this regard ESCC concurred with the conclusions of the submitted Archaeological Desk-Based Assessment and provided no objection subject to securing a programme of archaeological works via condition.

### Flood Risk and Drainage

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- 3.14.12 The Site is at a low risk of flooding from all sources and as a result the Council previously confirmed in their Report to Committee that the provision of housing on Site is acceptable in principle subject to appropriately designed foul and surface water drainage systems that ensure satisfactory drainage and do not increase flood risk elsewhere.
- 3.14.13 With regard to foul sewage, Southern Water confirmed that whilst initial dwellings may be able to be connected to the network, pending network reinforcement. It was deemed acceptable that these matters could be managed via condition to ensure that occupation of the development was phased and implemented to align with network upgrades.
- 3.14.14 With regard to surface water, the Pevensey and Cuckmere Water Level Management Board and Lead Local Flood Authority were previously satisfied that it would be possible to manage surface water runoff from the Site without increasing risk elsewhere subject to the imposition of conditions relating to the detailed design of the drainage system, including the inclusion of a swale / land drainage forming part of this.

### Landscape

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- 3.14.15 As part of the determination of the previously Refused Application the ESCC Landscape Architect raised concern regarding the provision on an adequate landscape buffer to the cemetery.
- 3.14.16 The Council however are clear in their Committee Report that whilst the housing development would be visible from the south-western part of the cemetery and any future western extension, it is not unusual for cemeteries to be adjacent to residential development. Therefore, whilst the proposal was considered to cause some harm to the landscape setting of the cemetery this was not considered to constitute significant harm.
- 3.14.17 Notwithstanding this, the Council highlighted that whilst the development of the Site would result in some harm to landscape by reason of eroding of the countryside, which results in the loss of its intrinsic character and beauty. The Site's context is on the edge of Bexhill adjacent to the development boundary and

surrounding by other development and would therefore not constitute significant harm.

### Compatibility with adjacent Ashdown Brickworks and Quarry

- 3.14.18 The HELAA reflects the Decision Notice of the previously Refused Application on the Site. Highlighting that the proposals were refused due to a concern that the existing operations at the Brickworks would harm the residential amenities of future occupiers and the residential use could unreasonably restrict the future economic growth of the Brickworks.
- 3.14.19 Whilst the Site does not fall within the Mineral Safeguarding Area (that the Brickworks is within) it does comprise land designated as being in a Mineral Consultation Area.
- 3.14.20 Rother's Environment Health (REH) service previously confirmed that the provision of an acoustic fence was considered acceptable in principle in addition to the property facades only requiring standard glazing and ventilation specifications with the full details of the fence being secured via condition. Indeed, subject to the imposition of this condition, the housing development would be compatible with the permitted operations of the Ashdown Brickworks and Quarry.
- 3.14.21 Whilst previous concern was raised by Ibstock over the development of the Site sterilising potential clay resources available within the footprint of the Brickworks building (i.e., the demolition of the Brickworks building and then quarrying under its footprint), there is not currently a Planning Permission (or Application) that permits the extraction of clay from this area.
- 3.14.22 In this regard, should Ibstock secure a Planning Permission for these works, there would be a marginal exceedance over the BS 8233:2014 guidelines at a small number of properties at the Site if it were to be developed for housing. However, the Council were clear that this would also lead to an increase at existing residential properties along Turkey Road, which would also be over the BS 8233:2014 guidelines. In view of this, the Council considered that the development of housing on this Site would not result in the Brickworks being required to provide additional measures over and above what would be required for the existing properties.
- 3.14.23 In addition to this, ESCC Minerals and Waste Planning Authority did not raise an objection to the housing development in regard to the development prejudicing future extraction of clay beneath the Brickworks building. Indeed, the Council agreed with this position in their Committee Report.

### Deliverability

- 3.14.24 The Site is considered to comprise a natural and logical extension to the settlement boundary of Bexhill, served well by the existing road and pedestrian

infrastructure in this location of the settlement. Bellway Homes Ltd, a leading national housebuilder, hold a legal interest in the Site and additionally are at Appeal for a recently Refused Application, which 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

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- 3.14.25 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 Turkey Road 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 that the proposal would not form an isolated standalone development, and that it would form part of a well-connected and sustainable community.
- 3.14.26 In light of the above, it is clear that potential Site BEX0112 identified in the Draft HELAA can accommodate more growth in Bexhill. We therefore strongly recommend that the site's capacity is to revised that set out within the informed planning application (89 dwellings) and that the site is allocated in the next version of the emerging Local Plan.

### 3.15 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?

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- 3.15.1 The Council's housing supply components are consolidated in in Table 3.3 below 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
D&SA and Neighbourhood Plan allocations without permission brought forward	1,660
Additional HELAA potential sites	2,129
Windfall projection (across the district)	663
<b>Total Range</b>	<b>5,158 - 7,287</b>

TABLE 3.3: SUMMARY OF PROPOSED SOURCES OF HOUSING SUPPLY

- 3.15.2 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).
- 3.15.3 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.
- 3.15.4 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.
- 3.15.5 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).

### **3.16 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?**

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- 3.16.1 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.
- 3.16.2 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.
- 3.16.3 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 urgently 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.

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

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- 3.17.1 Draft Policy HOU1 sets out the Council's preferred housing type and mix for both market and affordable homes. According to this Draft Policy, in all housing developments that include market housing, at least 30% of the market housing shall comprise one- and two-bedroom dwellings.
- 3.17.2 It is important that this proposed 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 the proposed Policy reflects this, the Policy should make it absolutely clear that private mix must be dictated by the market.

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

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- 3.18.1 To meet the Rother'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.

3.18.2 The Draft 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; and
- 17% Other Affordable Home Ownership.

3.18.3 As stated in response to Question 114, it is important that this Draft 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 proposed Policy must allow flexibility to account for market conditions. Onerous or inflexible affordable requirements can upset a site's viability and accordingly it is essential that the viability of the proposed Policy is carefully assessed.

3.18.4 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.

## 4 CONCLUSION

### 4.1 REPRESENTATION SUMMARY

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- 4.1.1 This representation has been prepared on behalf of Bellway Homes Ltd in response to the Rother Draft Local Plan (Regulation 18) Consultation, which runs until 23<sup>rd</sup> July 2024.
- 4.1.2 Bellway are supportive of the admirable aims and aspirations with regard to growth around Bexhill, which reflects the Settlement's status as the most sustainable settlement (by some margin) in the District. Indeed, we are supportive of many of the aspirations that underpin the 'Live Well Locally' priority, however, we are concerned over the lack of potential Live Well Locally Areas and Potential Development Growth Areas in the north of Bexhill.
- 4.1.3 These representations support the allocation of the Site (i.e., Land at Turkey Road) (reference: BEX0112) within the next version of the draft Local Plan. The site is inherently sustainable and its allocation would complement the wider Live Well Locally intentions for this part of Bexhill.
- 4.1.4 For the reasons set out in this Document, we do raise concerns that the overall strategy proposed would not evolve to a sound Plan. 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.
- 4.1.5 Given the increasing need for additional housing over the Plan period, we consider that the Land at Turkey Road 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.
- 4.1.6 In view of the clear consistency between our client's Site and the preferred growth strategy and the established nature of north and west Bexhill as a suitable location for housing, we submit that Land at Turkey Road is relatively unconstrained and suitable to accommodate a proportionate level of growth to assist in meeting the housing target within the emerging Plan period.
- 4.1.7 Finally, in respect of suitability there are no physical limitations or problems such as access, infrastructure, flood risk, hazardous risks, pollution, or contamination, in addition to being located outside of the High Weald National Landscape.
- 4.1.8 Taking all the above into consideration, we consider that our client's land 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.
- 4.1.9 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.