23 July 2024

Our Ref: PD/KH/24035

Mr Andrew Vallance Deputy Chief Executive Rother District Council Town Hall Bexhill-on-Sea TN39 3JX

For attn of Planning Policy Team



Town Planning & Development Consultants Highway House Lower Froyle Hants GU34 4NB

Dear Mr Vallance

## TOWN AND COUNTRY PLANNING ACT 1990 ROTHER LOCAL PLAN 2020-2040 DRAFT (REGULATION 18) VERSION, APRIL 2024 - CONSULTATION FORMER SIDLEY SPORTS GROUND, GLOVERS LANE, BEXHILL-ON-SEA TN39 5ER

I am writing on behalf of Wards of London, the landowners of former Sidley Sports Ground, Glovers Lane, Bexhill-on-Sea TN39 5ER. The extent of their land is shown on the attached plan.

The Regulation 18 Draft Version advises that it sets out a clear and evidenced policy direction that the Council wishes to take in respect of key planning objectives. Paragraph 1.40 explains that individual site allocation policies will form Chapter 13 in due course, but this is not part of the Regulation 18 consultation because the Council wants to consult on the development strategy and draft housing and economic land availability assessment (HELAA) before final site selection and specific site allocation policies are prepared. My comments are therefore made in that context.

You will be aware that the former Sidley Sports Ground site is allocated under Policy BEX11 of the adopted DaSA (December 2019) for a full size 3G artificial grass pitch (AGP) including floodlighting, ancillary changing facilities, a community hub and associated open space.

However, the Council has recently reassessed the site (BEX0032) as part of its consideration of the Draft HELAA April 2024 which forms an important part of the evidence base to the emerging local plan. It notes that the site was previously the sports ground of Sidley United Football Club but has been disused since around 2013, so more than 10 years. It also notes that the landowner has indicated the site is available for residential development, however, its current planning use remains as open space as a sports field and an alternative use would be contrary to policy BEX11 and the NPPF which seeks to retain valued community facilities and services and

guards against the loss of sports and recreational buildings and land unless they are surplus to requirements or the loss would be replaced by equivalent or better provision in terms of quantity and/or quality in a suitable location.

The Council's assessment concludes that current evidence suggests the existing allocation is unlikely to come forward but in principle the site is in a sustainable location for housing. The assessment states that if the landowner were to provide a 3G pitch and associated facilities in a suitable alternative location, then the site could potentially be suitable for a mixed-use, to include residential development, a community use and open space, subject to a change to adopted local plan policy.

The emerging local plan review provides such an opportunity to change the policy so that the overall objectives relating to the provision of appropriate sport and recreation facilities are still met but a positive and viable use for the site can be encouraged to come forward rather than it remaining vacant and disused.

The landowners and their professional team, including myself, are in discussions with Council officers and other stakeholders to seek agreement on a package which would meet all the relevant policy objectives. This package is based on the provision of a full-sized 3G pitch with floodlighting and associated facilities at Bexhill Academy to the west of the site. This would provide a significant enhancement and improvement to the current sports pitch offer at the Academy both for its pupils and for the wider community. This provision would then free up the site for residential-led development. These discussions are at an advanced stage and we shortly intend to engage directly with the Planning Policy team.

The HELAA indicates that the site would be suitable for a mixed-use including residential development, a community use and open space. Clearly there are questions around financial viability that need to be assessed in order to ensure that any allocation is viable and there are realistic expectations of what can be funded by the residential development. Discussions with Graeme Quinnell, the Council's Housing Enabling and Development Officer, have been on the basis of a 100% affordable scheme. A feasibility exercise is being undertaken to determine the costs of the 3G pitch and associated facilities. The development will also need to fund other requirements such as biodiversity net gain and CIL where applicable whilst still provide a commercial incentive for the landowner to bring forward proposals.

We would therefore welcome the opportunity to discuss a site allocation to be included in the Regulation 19 plan for residential-led development on a viable scale together with a requirement that the loss of the former playing field would be replaced by equivalent or better provision in terms of quantity and/or quality in a suitable location.

Please do not hesitate to contact me if you require any additional information or clarification in relation to these representations.

Yours sincerely



BA (Hons) MRTPI MRICS MCMI



## FORMER SIDLEY SPORTS GROUND, GLOVERS LANE, BEXHILL-ON-SEA TN39 5ER LOCATION PLAN SCALE 1:1250 (A4)



0 20 40 60 80 100 SCALE 1:2500 m