



Rother Local Plan 2020-2040

(Regulation 18) Version

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gladman.co.uk



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1 INTRODUCTION

1.1 Context

1.1.1 Gladman Developments Ltd (Gladman) welcome the opportunity to comment on the Draft Rother Local Plan consultation and request to be updated on future consultations and the progress of the Local Plan.

1.1.2 Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure and have considerable experience in contributing to the development plan preparation process having made representations on numerous planning documents throughout the UK alongside participating in many Examinations in Public.

1.1.3 Gladman Developments have land interests in Rother which are being promoted through the emerging Local Plan. These include:

- Land east of Watermill Lane (BEX 0003);
- Land north of A2691 NBAR (east), Bexhill (BEX 0163);
- Land north of Rosewood Park, Gotham Farm, Bexhill on-Sea (BEX 0159);
- Land at Gotham Farm (west), Sandhurst Lane, Bexhil (BEX 0206);
- Land south of Whydown Road (BEX 0177); and
- Land at Chestnut Meadows Site B, Bexhill (BEX 0209)

1.1.4 The sites are available, suitable, and deliverable for housing, site submissions have been included in Section 4 of these representations and we would appreciate the opportunity to discuss these proposals further with the Council in due course.

2 NATIONAL POLICY

2.1 Labour Government

- 2.1.1 A new Labour government was elected on the 4th July 2024 and early indications are that the new government will be pushing a growth agenda. On the 8th July In her first speech as Chancellor, Rachel Reeves laid out plans to rebuild Britain and make every part of the country better off.
- 2.1.2 Immediate reforms to the planning system are expected with a potential new NPPF consultation expected before the end of the month outlining "a new growth-focused approach to the planning system".
- 2.1.3 The Council should closely monitor any changes to the planning system during the production of the new Local Plan with a pro-growth stance a key driver.

3 ROTHER LOCAL PLAN

3.1 Context

3.1.1 The Draft Rother Local Plan (RLP) consultations marks a significant stage of the production of a new Local Plan to replace Rother's Core Strategy (2014) and Development and Site Allocations (2019) Plans. Getting an up-to-date strategic plan that facilitates the delivery of much needed new housing is critical in the context of a national housing crisis. Gladman welcome this significant stage and are keen to work with the Council moving forward.

3.1.2 Our response deals with several of the questions posed and sets out how the land interests we are promoting in Rother align with the Councils overall vision and strategic objectives.

3.2 Vision, Overall Priorities and Objectives

Q1. What are your views on the Council's Vision? Q2. What are your views on proposed twin Overall Priorities to be 'Green to the Core' and 'Live Well Locally'? Q3. What are your views on the key issues (listed at paragraph 2.13) that have been identified and is there anything significant missing?

3.2.1 Gladman are generally supportive of the vision and overall priorities of the Rother Local Plan although consider that a further priority should be supported in facilitating growth. The new government has been clear about the importance of supporting growth and this should be recognised through the vision of the Local Plan whilst striking a balance between the two identified priorities.

3.2.2 Whilst the vision sets out an appropriate aspiration, it is not backed up by the policies in the local plan which is currently proposing not to meet housing needs, which in turn will have significant consequences for the local community.

3.3 Green to the Core

Q6. What are your views on the Council's proposed policy for net zero standards and which parts of the policy do you support? Q7. How important is it for Rother to seek to set high standards? Q8. Are there any alternatives or additional points the Council should be considering?

3.3.1 Whilst we agree that there is a need to act to reduce carbon emissions through the construction and operation of new buildings, we would suggest that this should not be

undertaken through local plan policies given that there is already a national approach, the Future Homes Standard, being taken forward to achieve the same goal. Delivering these improvements through building regulations has a distinct advantage over delivering a variety of different approach across the country in that it provides a single approach that all developers understand and can be rolled out at scale. This allows supply chains and skills to be improved prior to implementation and ensure that improvements to building standards are actually deliverable from the point at which they are introduced.

Q20. What are your views on the Council's proposed policy for Local Nature Recovery Areas?

- 3.3.2 The policy states that all development must meet the objectives of the East Sussex (including Brighton and Hove) Local Nature Recovery Strategy (LNRS). It is inappropriate to require development to meet objectives in a document that is not a development plan document. Whilst the council can suggest that development have regard to the LNRS it is not consistent with national policy to require them to meet these objectives. It would also be perverse to require development to adhere to a set of objectives that the council itself only has a duty to have regard to in its decision-making processes. Gladman recommends this amended to state development will have regard to the objectives set out in the LNRS.
- 3.3.3 Whilst Gladman would agree with the principle of having regard to Local Nature Recovery, it is considered that additional clarity would be required by what is meant by directing 'Biodiversity Net Gain to where it can be of most benefit' and a suitable balance must be struck in supporting the environment whilst also facilitating development.

Q22. What are your views on the Council's proposed policy for Biodiversity Net Gain? Q23. What are your views on the Council going above the national minimum requirement of 10%? Q24. Are there any alternatives or additional points the Council should be considering?

- 3.3.4 Recognising that the Environment Act sets the 10% as a minimum and Government statements indicate that Councils can go further in local plans, this would need to be justified that there is both a need to go beyond 10% and that this requirement will not, when considered in combination with other policies impact on the deliverability of the local plan.
- 3.3.5 The Council must recognise that delivering statutory net gains is still in its infancy and as such there is great uncertainty as to the most effective way of delivering BNG, the cost of

delivering 10% net gain, and whether there will be sufficient local offsite credits in the short and medium term to support schemes that cannot deliver a 10% gain on site.

- 3.3.6 The Councils must also be clear as to ecological reasons why development would be required to deliver a higher level of net gain than the statutory minimum. A 10% net gain will ensure that development leaves more biodiversity than was previously the case.

3.4 Live Well Locally

Q27. What are your views on the Council's proposed policy on compact development? Q28. What are your views on the area types and densities proposed as a key driver to Live Well Locally?

- 3.4.1 Recognising that this policy is seeking to ensure that new developments are well designed, attractive and healthy places sufficient flexibility should be afforded to the densities of new development to ensure good place making. Over prioritising higher densities does not necessarily lead to better place making. Gladman consider that further flexibility should be applied to these development densities.

Q30. What are your views on the Council's proposed policy on facilities and services? Q31. Are there any alternatives or additional points the Council should be considering? Q32. Specifically, what are your views on the proposed mix of local amenities and the requirement, within certain area types, for new development to be located within an 800m walk of these amenities?

- 3.4.2 Whilst recognising the desire for developments to be located within 800m walking distance of a number of key services and facilities this is not always possible in the largest most sustainable settlements in the district.

- 3.4.3 In instances such as this, the flexibility afforded to larger villages and countryside locations should equally apply to the most sustainable settlements, which whilst not necessarily within the 800m walking distance, a greater number of services and facilities are available to communities in the vicinity.

Q33. What are your views on the Council's proposed policy on walking, wheeling, cycling and public transport (outside the site)? Q34. Are there any alternatives or additional points the Council should be considering? Q35. Specifically, what are your views on the requirements set regarding public transport, such as the 400m walking distance proximity requirement?

3.4.4 Gladman are generally supportive of the proposed policy on walking, wheeling, cycling and public transport outside of the site but consider that flexibility should be applied and the 400m distance should be used as a guide and not used to restrict otherwise sustainable development proposals.

Q36. What are your views on the Council's proposed policy on walking, wheeling, cycling and public transport (within the site)? Q37. Are there any alternatives or additional points the Council should be considering? Q38. Specifically, what are your views on the provision of Demand Responsive Transport, car clubs and car shares?

3.4.5 Gladman are generally supportive of the proposed approach to walking, wheeling, cycling and public transport within the site, with many of the requirements generally considerations of good place making and developments that Gladman bring forward.

3.4.6 We have brought forward mobility hubs, incorporating car clubs and car sharing alongside bike hire successfully on a number of development projects and are willing to consider it on projects we are promoting through the Local Plan.

Q39. What are your views on the Council's proposed policy on distinctive places? Q40. Are there any alternatives or additional points the Council should be considering? Q41. Specifically, what are your views on using the considerations in Building for a Healthy Life and Streets for a Healthy Life as a framework for assessing residential development?

3.4.7 Gladman would suggest that a number of elements of this policy would be considered as good place making and what we strive for on each of our developments. There is no one size fits all approach and this flexibility should be recognised when considering development proposals.

Q51. What are your views on the Council's preferred spatial development options? Q52. Do you have any comments on the merits of the alternative Spatial Development Options, that do not form part of the preferred development options – as explained in the background paper? Q53. Are there any other development options that the Council should consider as part of its Local Plan?

3.4.8 Recognising the significant constraints that affect the district, 83% of the district is within the High Weald National Landscape (NL), historic constraints and environmental designations whilst planning for housing development is complex, the spatial strategy essentially determines itself.

- 3.4.9 The draft Local Plan states that this is a landscape-led spatial strategy that will deliver between 258 to 364 dwelling per annum (dpa) over the plan period. This is between 369 and 475 homes each year below what the minimum required by the standard method. The failure to meet needs in full also means that affordable housing delivery will be substantially below what is needed.
- 3.4.10 As a main transport and community hub in the district, significant housing delivery in Bexhill will be essential in providing for a successful spatial strategy. North and West of Bexhill are the most sustainable locations in the district and significant housing should be allocated to the town on sites capable of delivering housing, whilst balancing the recognised constraints of the district. It is essential that sites allocated are maximised to ensure that the most effective use of land is utilised.
- 3.4.11 Gladman consider it essential to recognise the significant impact that not meeting housing needs will have on its population and starts to take a more positive approach to meeting housing needs. Whilst we recognise that there are a range of constraints in the district the NPPF is clear in Paragraph 11 that these must provide strong reasons for restricting growth and as part of these considerations the Council must also take full account of the social and economic impacts of not meeting needs, not just the potential harms.
- 3.4.12 It will also be vital that the council seeks to maximise development on each site it does allocate give the significant shortfall between housing needs and supply. The Council should look to ensure that all land within submitted sites that are considered suitable for development are allocated for development. In allocating sites, the Council should be mindful that to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets.
- 3.4.13 The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range of demand. In summary a wider variety of sites in the widest possible range of locations ensures all types of house builder have access to suitable land which in turn increases housing delivery.

3.4.14 Gladman support the important role that Bexhill plays in the spatial strategy for the district and are promoting a series of development interests in this area that could contribute to the timely delivery of housing within the plan period.

Q54. What are your views on the Council's proposed spatial development strategy and proposed minimum targets for housing and employment growth? Q55. Are there any alternatives or additional points the Council should be considering?

3.4.15 The NPPF requires the standard method to be used unless exceptional circumstances justify an alternative approach. We agree that there are no exceptional circumstances which would warrant a different approach than the standard method being used as the starting point for considering the housing requirement for Rother.

3.4.16 Recognising that the housing targets of the district significantly increase when using the standard methodology as opposed to the adopted approach using an objective assessment, every effort should be made to deliver the minimum housing requirement as determined by the standard methodology.

3.4.17 Gladman strongly support the need for more housing in Rother for a variety of reasons including addressing the current housing crisis, meeting housing need, providing affordable housing and to support employment growth. Gladman would request that the Councils fully considers all of the issues when determining the housing requirement.

Q56. What are your views on the vision for Bexhill? 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? Q58. What are your views on the potential sites identified in the draft HELAA that could accommodate more growth in Bexhill?

3.4.18 Gladman support the vision for Bexhill which identifies that the settlement will be a key focus for growth however we consider that the development quantum proposed for the town could be increased.

3.4.19 It will also be vital that the council seeks to maximise development on each site it does allocate give the significant shortfall between housing needs and supply. The Council should look to ensure that all land within submitted sites that are considered suitable for development are allocated for development. For the same reason, sites that are 'rejected' must have robust or compelling reasons for the non allocation of the sites, in the context of the proposed shortfall of housing delivery.

3.4.20 We are promoting a number of sites around the town that have been identified as suitable and these sites should be allocated for residential development but we are also promoting a series of that have currently been 'rejected'. Gladman have provided commentary on each of these assessments below:

- Land east of Watermill Lane (BEX 0003);
- Land north of A2691 NBAR (east), Bexhill (BEX 0163);
- Land north of Rosewood Park, Gotham Farm, Bexhill (BEX 0159);
- Land at Gotham Farm (west), Sandhurst Lane, Bexhill (BEX 0206);
- Land south of Whydown Road (BEX 0177); and
- Land at Chestnut Meadows Site B, Bexhill (BEX 0209)

Land east of Watermill Lane (BEX 0003)

3.4.21 This site is allocated in the adopted Local Plan. Gladman are engaged in the promotion of this site on behalf of the landowners and are currently in the process of entering into to a Planning Performance Agreement with the Council with the intention of submitting a planning application in the near future.

3.4.22 This site is deliverable and should be retained as an allocation within the emerging Local Plan.

Land north of A2691 NBAR (east), Bexhill (BEX 0163)

3.4.23 The site can be identified in the HELAA as 'BEX0163' which is a HELAA 'Potential Site'. The following table assesses the key points raised by the council in the site assessment section of the HELAA:

| Land north of the NBAR (BEX0163) | |
|--|---|
| Site constraints noted in the HELAA | GDL assessment |
| Capacity – 25 dwellings | As seen in the Development Framework Plan submitted as part of Gladman's reps, it is clear that more than 25 dwellings can be accommodated on this site. Considering the need for housing in the district and sustainability of Bexhill, this site should be maximised for its residential potential. |
| Ancient Woodland, Priority Habitat and Local Wildlife Sites. | As part of due diligence works to inform any planning proposal, ecology and arboricultural surveys would be carried out |

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| | and the scheme would be designed to ensure the impact of the proposed development on such features is minimised and, if necessary, can be mitigated against. Any proposed development will be designed to ensure a buffer is provided between built development and the ancient woodland. |
| Areas of flood risk | Built development would be situated outside of the flood zone. The development would be designed to include SuDS features to ensure it does not give rise to any further flood risk elsewhere. |
| Heritage impact to the listed building | Natural screening lies between the area proposed for development and the Cockerels Farmhouse Listed Building. To ensure the heritage impact is kept to a minimum, development proposals can be further screened using landscape planting techniques. |
| Suitable vehicular access | Any future proposals will be predicated on achieving a suitable access from Havenbrook Avenue, which Gladman are currently exploring as part of the BEX3c application. Based on conversations with highways consultants, access off Havenbrook Avenue appears to be achievable. |
| Development to the north of Havenbrook Avenue | As outlined in Gladman's representations, currently the allocations for housing in the draft Local Plan are far below the requirement for the district. The council therefore need to allocate ore housing, particularly around the most sustainable settlement of Bexhill. This has been further echoed by Rachel Reeves recent statement where an emphasis on housing growth is going to be a key part of forthcoming planning reforms. |

3.4.24 Following the council's assessment, the site has been identified as a 'North Bexhill Potential Development Growth Area' in the draft Local Plan. Gladman support the council's inclusion of this site in the Local Plan, and will continue to demonstrate why it is a suitable location for housing growth.

Land north of Rosewood Park, Gotham Farm, Bexhill (BEX 0159)

3.4.25 The site can be identified in the HELAA as 'BEX0159' which is a HELAA 'Potential Site'. The following table assesses the key points raised by the council in the site assessment section of the HELAA:

| Site constraints noted in the HELAA | |
|--|---|
| Capacity – 250 dwellings | Through the application process and masterplanning exercises, Gladman have demonstrated how up to 340 dwellings are deliverable on the site while retaining sufficient open space provision and ensuring environmental constraints are not impacted. |
| Area of flood risk in the south west corner | As demonstrated by the Flood Risk Assessment submitted with the planning application the proposed developable area lies within flood zone 1, with areas adjacent to the on-site watercourses in flood zones 2 and 3. The SuDS strategy will not increase flood risk to the surrounding area. |
| Ancient woodland and tree conservation concerns | The proposed development incorporates a buffer from built development to ensure the preservation of the ancient woodland. The Arboricultural Assessment submitted alongside the application concludes that proposed tree removals necessary to facilitate construction of housing are not a constraint on the development of the site. Moreover, the development proposes additional tree planting along recreational routes, to form new defensible boundaries and within the central open space area. |
| Unsustainable location | Through the application process the development proposal has changed to include a community use/retail facility on site, allowing future residents to walk to a shop with ease. Other facilities can be found in walking distance at Little Common, as seen in the below map. Walking desire lines have been created through alterations to the Development Framework Plan which reduce travel times to these facilities. |
| The site is within the Pevensey Levels Hydrological Catchment Area | Submitted documentation as part of the application has demonstrated that the proposed development will not give rise to any significant adverse effects on the Pevensey Levels. |

3.4.26 Following the Council's assessment, the site has been identified as a 'West Bexhill Potential Development Growth Area' in the draft Local Plan. Gladman support the council's inclusion of this site in the Local Plan, and will continue to demonstrate why it is a suitable location for housing growth.

Land at Gotham Farm (west), Sandhurst Lane, Bexhill (BEX 0206)

3.4.27 The site can be identified in the HELAA as 'BEX0206' which is a HELAA 'Rejected Site'. The following table assesses the key points raised by the council in the site assessment section of the HELAA:

| Site constraints noted in the HELAA | |
|--|--|
| Landscape impact | The site is surrounded by a mature tree belt to the north and west and Sandhurst Lane to the south and east. Future development would be contained well and screened from any long distance views. |
| Unsustainable location | It is widely acknowledged that Bexhill is the most sustainable location for housing growth in the district. This is particularly true of the west of Bexhill, where a range of services and facilities are accessible on foot and through the sustainable public transport modes currently available. The walking distances can be seen on the map later in this StoryMap. If permitted, the retail facility as part of the adjacent application will offer a reduced walking distance to a shop for future residents. |
| Access via Sandhurst Lane is unsuitable | Gladman acknowledge that Sandhurst Lane appears unsuitable for access currently. The most suitable vehicular access route would appear to be through the proposed development at land north of Rosewood Park. |
| Flood risk to the west | Built development would be situated outside of the flood zone. The development would be designed to include SuDS features to ensure it does not give rise to any further flood risk elsewhere. |
| Priority habitat to the south west | Ecology and arboricultural assessments would be carried out and any development will be designed to ensure that its impact on priority habitat would be minimised and, if necessary, mitigated against. |

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| The site is within the Pevensey Levels Hydrological Catchment Area | Any development proposal will be designed to ensure that it does not give rise to any significant adverse effects on the Pevensey Levels. |
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3.4.28 Following the council's assessment, the site has not been included as an area for future growth in the draft Local Plan. Gladman believe that it should be included as a growth area due to the reasons set out in our analysis and the later sections which demonstrate the benefits that development will bring to Bexhill. The site will also help the council meet its housing requirement in the emerging Local Plan.

Land south of Whydown Road (BEX 0177)

The site can be identified in the HELAA as 'BEX0177' which is a HELAA 'Rejected Site'. The following table assesses the key points raised by the council in the site assessment section of the HELAA:

| Site constraints noted in the HELAA | |
|--|---|
| Ancient woodland, priority habitat and local wildlife site | As part of due diligence works to inform any planning proposal, ecology and arboricultural surveys would be carried out and the scheme would be designed to ensure the impact of the proposed development on such features is minimised and, if necessary, can be mitigated against. Any proposed development will be designed to ensure a buffer is provided between built development and the ancient woodland. |
| Landscape impact | The site is surrounded by a mature tree belt to the north and east. As mentioned in the HELAA, if the pending application (Ref: RR/2023/1721/P) is approved, the context will change. This site will relate well to the new development when built out and the landscape harm will be minimal. |
| Unsustainable location | It is widely acknowledged that Bexhill is the most sustainable location for housing growth in the district. This is particularly true of the west of Bexhill, where a range of services and facilities are accessible on foot and through the sustainable public transport modes currently available. The walking distances can be seen on the map later in this StoryMap. If permitted, the retail facility as part of the adjacent application will |

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| | drastically reduce walking distances to a shop for future residents. |
| Surface water flooding | Any proposed development and proposed surface water attenuation features would avoid any fluvial, tidal and pluvial flood risk areas. |
| The site is within the Pevensey Levels Hydrological Catchment Area | Technical reports submitted with a future application will ensure that the proposal will not give rise to any significant adverse impact. The site is also further from the designation than other recently approved schemes, it is therefore unlikely to give rise to any harm. |
| Ancient woodland, priority habitat and local wildlife site | As part of due diligence works to inform any planning proposal, ecology and arboricultural surveys would be carried out and the scheme would be designed to ensure the impact of the proposed development on such features is minimised and, if necessary, can be mitigated against. Any proposed development will be designed to ensure a buffer is provided between built development and the ancient woodland. |

3.4.29 Following the council's assessment, the site has not been included as an area for future growth in the draft Local Plan. Gladman believe that it should be included as a growth area due to the reasons set out in our analysis and the later sections which demonstrate the benefits that development will bring to Bexhill. The site will also help the council meet its housing requirement in the emerging Local Plan.

Land at Chestnut Meadows Site B, Bexhill (BEX 0209)

3.4.30 The site can be identified in the HELAA as 'BEX0209' which is a HELAA 'Rejected Site'. The following table assesses the key points raised by the council in the site assessment section of the HELAA:

| Site constraints noted in the HELAA | GDL assessment |
|---------------------------------------|--|
| Ancient woodland and priority habitat | As part of due diligence works to inform any planning proposal, ecology and arboricultural surveys would be carried out and the scheme would be designed to ensure the impact of the proposed development on |

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| | such features is minimised and, if necessary, can be mitigated against. Any proposed development will be designed to ensure a buffer is provided between built development and the ancient woodland. |
| Surface water flooding | Any proposed development and proposed surface water attenuation features would avoid any fluvial, tidal and pluvial flood risk areas. |
| The site is within the Pevensey Levels Hydrological Catchment Area | Any development proposal will be designed to ensure that it does not give rise to any significant adverse effects on the Pevensey Levels. The site is also further from the designation than other recently approved schemes, it is therefore unlikely to give rise to any harm. |
| Landscape impact and dismissed appeal | Gladman acknowledge that the site area which has been assessed through the HELAA is much smaller than the land available. This means any housing proposal on this site will firstly relate well to HELAA 'potential site' BEX0132. Additionally, the wider land holding allows for a flexible masterplanning process which considers the surrounding landscape. Landscape planting surrounding future development can therefore screen the development from long ranging, impactful viewpoints. |
| Ancient woodland and priority habitat | As part of due diligence works to inform any planning proposal, ecology and arboricultural surveys would be carried out and the scheme would be designed to ensure the impact of the proposed development on such features is minimised and, if necessary, can be mitigated against. Any proposed development will be designed to ensure a buffer is provided between built development and the ancient woodland. |
| Surface water flooding | Any proposed development and proposed surface water attenuation features would avoid any fluvial, tidal and pluvial flood risk areas. |

3.4.31 The site is not within an area designation as national landscape nor within the designated gap between Bexhill and Hastings and is therefore suitable for allocation within the emerging Rother Local Plan.

- 3.4.32 Following the council's assessment, the site has not been included as an area for future growth in the draft Local Plan. Gladman believe that it should be included as a growth area due to the reasons set out in our analysis and the later sections which demonstrate the benefits that development will bring to Bexhill. The site will also help the council meet its housing requirement in the emerging Local Plan.

Conclusions

- 3.4.33 With assessments updated to reflect our comments above we consider that all of these sites should now also be considered as suitable and be allocated in the next iteration of the Local Plan. The significant step change in housing delivery can only be achieved by coming to pragmatic conclusions on sites, this is all the more important as the Council are suggesting that based on HELAA assessment there will be a significant shortfall against the minimum housing needs.

Q76. What are your views on the district-wide development potential for the Local Plan up to 2040 which is presented in 34, 35 and 36?

- 3.4.34 In relation to Figures 34 and 36, Gladman question the identified potential of sites assessed within the HELAA. We have provided commentary above in relation to the a number of assessed sites that we contend should be considered as suitable. This would increase the overall development potential district wide.
- 3.4.35 We observe that as currently assessed, even on the higher figure of those considered the Council would be significantly short in terms of housing delivery within the plan period.
- 3.4.36 We would agree with Bexhill being identified as one of the most sustainable areas of the district where there are higher opportunities for development.

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?

- 3.4.37 Gladman would urge caution when considering the use of a stepped trajectory. Whilst recognising that the minimum housing target has increased significantly within the district from the adopted Local Plan, with increasing housing permissions housing delivery is increasing across the district.
- 3.4.38 By providing greater certainty with the allocation of a number of additional sites Gladman would suggest that this could be achieved without the need for a stepped trajectory. If continuing to consider the use of a stepped trajectory must be considered in the context of

meeting housing needs in full in the plan period. This also shouldn't be used to artificially suppress the needs of much needed housing.

Q82. What are your views on the Council's approach to development boundaries? Q83. Are there any alternatives or additional points the Council should be considering?

- 3.4.39 Gladman are opposed to the use of settlement boundaries that seek to arbitrarily restrict development proposals. We advocate for a criterion based approach that would support development on the edge of existing settlements that would allow for the Council to maintain control on future development where a housing land supply couldn't be demonstrated as required. Such an approach would still ensure that the countryside could be protected.

Q87. What are your views on the Council's strategy approaches to small sites and windfall development? Q88. Are there any alternatives or additional points the Council should be considering? Q89. What are your views on the Council, based on evidence, targeting a greater percentage of housing to come from smaller sites than the expected 10%?

- 3.4.40 The Framework requires Local Plans to identify sites of no more than a hectare to accommodate 10% of the housing requirement. The Council is seeking to rely on historic windfall rates to demonstrate that this requirement will be met.

- 3.4.41 As the work has already been undertaken in assessing a number of the sites through the HELAA these sites could be allocated through the Local Plan giving greater certainty to the landowners/promoters, removing an element of risk.

- 3.4.42 In such circumstances, Gladman would suggest that 10% is the most appropriate quantum, whilst historic windfall rates may indicate 20% could be achieved the allocation of at least 10% should be the priority.

Q109. What are your views on the Council's proposed policy on strategic infrastructure requirements? Q110. Are there any alternatives or additional points the Council should be considering? Q111. Specifically, what are your views on requiring the submission of appropriate evidence to demonstrate that there is, or will be, sufficient infrastructure capacity to meet the demands of a new development?

- 3.4.43 A critical part of any Local Plan is ensuring the timely delivery of infrastructure to facilitate development. Gladman are willing to contribute towards necessary infrastructure requirements, whether that be through on-site delivery or offsite contributions.

Q116. What are your views on the Council's proposed policy on affordable housing? Q117. Are there any alternatives or additional points the Council should be considering? Q118. Do you consider that prioritising affordable housing or the Community Infrastructure Levy is more important for Rother?

3.4.44 Affordability and affordable housing delivery are significant issues that the Council need to address through the new Local Plan. Increasing the delivery of affordable housing will need to be balanced against infrastructure requirements, it would not be appropriate to prioritise either affordable housing or Community Infrastructure Levy.

3.4.45 Recognising previous affordable housing delivery issues, it is often medium sized greenfield developments that are most capable of delivering affordable housing. Gladman have a proven track record of providing policy compliant levels of affordable and are promoting a number of sites that would be suitable to provide a policy compliant level of affordable housing.

4 SITE SUBMISSIONS

4.1 Context

4.1.1 Gladman Developments have land interests in Rother which are being promoted through the emerging Local Plan. These include:

- Land east of Watermill Lane (BEX 0003);
- Land north of A2691 NBAR (east), Bexhill (BEX 0163);
- Land north of Rosewood Park, Gotham Farm, Bexhill (BEX 0159);
- Land at Gotham Farm (west), Sandhurst Lane, Bexhill (BEX 0206);
- Land south of Whydown Road (BEX 0177); and
- Land at Chestnut Meadows Site B, Bexhill (BEX 0209)

4.1.2 A link to the StoryMap collection for Gladman's portfolio of sites can be found here: <https://storymaps.arcgis.com/collections/315747d6c3ef40069b1b886958aaedaf>. Please navigate through the different sections to find supporting information for each site.

4.1.3 The sites are available, suitable, and deliverable for housing, site submissions have been included in Section 4 of these representations and we would appreciate the opportunity to discuss these proposals further with the Council in due course.

5 CONCLUSIONS

5.1 Summary

- 5.1.1 Gladman welcomes the opportunity to comment on the Draft Rother Local Plan. These representations have been drafted with reference to the revised National Planning Policy Framework (NPPF 2023) and the associated Planning Practice Guidance.
- 5.1.2 Gladman have provided comments on a number of the issues that have been identified in the Council's consultation material and recommend that the matters raised are carefully explored during the next stage of plan-preparation to ensure the Local Plan meets the tests of soundness set out in the NPPF.
- 5.1.3 Gladman have land interests within the plan area, and site submissions have been included in Section 4 of these representations along with an interactive and illustrative StoryMaps, and indicative concept plans showing how the sites could be delivered whilst delivering a range of significant benefits that align with the overall vision and strategic objectives. We would appreciate the opportunity to discuss these proposals further with the Council in due course.
- 5.1.4 We hope you have found these representations informative and useful towards the preparation of the emerging Local Plan and Gladman welcome any future engagement with the Council.

