

Boyer

Land at Breadsell

Regulation 18 Consultation: Development
Strategy and Site Allocations

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- **Appendix 1** - Location Plan

Under Separate Cover:

- **Appendix 2** - Vision Document
- **Appendix 3** - Hydroecological Assessment of Breadsell Farm
- **Appendix 4** - Hydroecological & Drainage Technical Note
- **Appendix 5** - Transport Delivery Note

1. INTRODUCTION

Background

- 1.1 These representations have been prepared by Boyer in response to the current 'Draft Local Plan 2025-2042 Regulation 18 Consultation', which runs until 23 March 2026. The representations are submitted on behalf of Wates Developments ('Wates'), which has appointed Boyer to promote Land at Breadsell ('the Site').
- 1.2 A number of appendices are provided. These are;
- **Appendix 1** - Location Plan
 - **Appendix 2** - Vision Document
 - **Appendix 3** - Hydroecological Assessment of Breadsell Farm
 - **Appendix 4** - Hydroecological & Drainage Technical Note
 - **Appendix 5** - Transport Delivery Note
- 1.3 As part of the Rother District Draft Local Plan 2025-2042 (the 'Draft Local Plan'), part of Wates' land interests for allocation under draft Policy BT2, 'Land at Breadsell, Battle'. This seeks the delivery of approximately 145 new dwellings alongside a primary access from the A2100.
- 1.4 As explained in these representations, the proposed allocation in Rother District Council's ('RDC') Draft Local Plan must be understood in terms of its relationship to Hastings Borough Council's (HBC's) own proposals. In that regard, HBC is concurrently consulting on its own 'Hastings Local Plan Draft Local Plan Preferred Options (Regulation 18)' document. Within HBC's emerging Plan, 'Land at Breadsell' is identified as a 'Development Potential Area' and a broad location for future growth.
- 1.5 Essentially, then, RDC and HBC are contemplating a cross-boundary allocation aimed at enabling strategic growth to the northwest of Hastings, within a shared Housing Market Area ('HMA').

Wates Developments

- 1.6 As a leading national land promoter, Wates has experience bringing forward sites ranging in scale from hundreds to thousands of new homes, in addition to strategic employment sites and commercial developments.
- 1.7 Wates has appointed a team of specialist consultants to promote Land at Breadsell, in order to demonstrate the site's suitability and capacity for delivery. This has included appointing an expert in complex hydroecological matters, as is pertinent to the site's consideration.

Structure of These Representations

- 1.8 As indicated, Wates' response to the current consultation relates to its land interests at Breadsell Farm. Accordingly, the remainder of this document is structured as follows:
- Section 2 – Describes Breadsell Farm and summarises the relevant background.

- Section 3 – Sets out Wates' response to proposed Policy Reference: BT2. The response will address each of the policy criteria (1 through to 14) and the supporting text.
- Section 4 – Provides a summary and conclusion.

2. LAND AT BREADSELL

Site Description

- 2.1 Wates interests, in Land at Breadsell, extend to approximately 28.38 hectares and lies to the northwest of St Leonards/Hastings/Baldlow. The northern part of the site (4.75 ha) is located within the administrative area of Rother District, whilst the main body of the site (23.63 ha) falls within Hastings Borough. Wates's land interest (see **Appendix 1**) comprises several agricultural parcels.
- 2.2 To the west, the site abuts Breadsell Lane, and to the north/northeast, the site adjoins Hastings Road (A2100), which is a principal road connecting the site to the main urban area to the southeast. Consequently, the proposed primary vehicular access (taken from the A2100) is envisaged to be located within RDC's administrative boundary, with housing development envisaged within both Local Authority areas.
- 2.3 To the east/south east is a dense area of woodland (Coneybarrow Wood, Birchen Wood and Marline Wood), beyond which lies the main urban area of Hastings. Other on-site physical features include agricultural drainage ditches, overhead electricity lines, and a gas main.
- 2.4 As noted below, the adjoining woodland includes areas of Ancient Woodland and a Site of Special Scientific Interest (SSSI) associated with a watercourse, the Marline Stream.

Main Considerations

- 2.5 As indicated in their respective Local Plan consultations, RDC and HBC identify the site as suitable for residential-led development, subject to further technical assessment, including in respect of impacts on the Marline Valley Woods SSSI.
- 2.6 To this end, after a period of engagement with Natural England, RDC and HBC jointly commissioned a detailed technical review of a proposed programme of hydrological monitoring, which was specified by Wates' own specialist consultants. This programme of investigative works will be carried out over the coming year, aiming to establish a clear understanding of the local hydrological regime and support an overall drainage strategy that avoids any adverse effects on the nearby SSSI.
- 2.7 In addition to this, and as outlined in our response to consultation questions below, RDC and HBC expect a coordinated scheme to be delivered across both sides of the Local Authority boundaries. This notably includes providing a primary access to the site from the A2100 within Rother District, while the main area of residential development would be situated within Hastings Borough.
- 2.8 There is also a requirement, detailed in both emerging Plans, to address various other matters related to landscape and the approach to areas of Ancient Woodland within the envisaged extent of the allocation, in addition to active travel and connectivity improvements, and to consider the need for an efficient use of land, balanced with the site's characteristics and constraints. Further detail on this is provided below.

- 2.9 Overall, Wates considers the site to be deliverable, pending resolution of the key issue of understanding and adequately managing the hydrological regime and its effects on the nearby SSSI. To this end, Wates is keen to pursue ongoing and further engagement with RDC, HDC, East Sussex County Council (ESCC), and Natural England, in addition to the formal Local Plan preparation and consultation process.

3. RESPONSE TO DRAFT LOCAL PLAN QUESTIONS

- 3.1 Wates have a specific interest in Land at Breadsell, and therefore respond to those questions that are pertinent to this.

Q7. Do you have any comments on the preferred approach for housing density shown in Figure 9, or on the updated Density Study (2026)?

- 3.2 In general terms, Wates supports an increase in the level of expected development densities, which aligns with national planning policy objectives outlined in the NPPF and the National Design Guide. However, this should be balanced with a practical understanding of site constraints and physical features, including gradients, which also influence design.
- 3.3 Wates' interests in Breadsell span across administrative boundaries, and the gradients are generally more challenging where the site lies within Hastings Borough rather than Rother District. This suggests it will be possible to achieve (and possibly exceed) the 35 dph reflected in Policy BT2. However, the design of any future development must still respond appropriately to the nearby National Landscape.
- 3.4 Overall, and taking into account the site's levels and features, Wates' appointed masterplanner advises that a density of around 40 dph (net) represents a feasible average when the site is considered as a whole, across the administrative boundary.

Q.9 Do you have any comments on the proposed growth opportunities in the sub-areas as shown in Figure 10?

- 3.5 Wates supports the proposed approach to growth within the identified Sub-Areas and agrees with the broad distribution envisaged. This includes the proposed apportionment of new housing growth within the 'Battle and Surrounding Settlements' category, within which Land at Breadsell has been included.
- 3.6 This said, evidently, the Plan does not meet housing needs in full, as calculated under the Standard Method. Whilst the majority of the district indeed falls within the High Weald National Landscape, it is equally the case that the shortfall arising within the Plan area (-7,077 homes over the envisaged 17-year Plan-period) is unlikely to be addressed by neighbouring Local Authorities and will go 'unmet'.
- 3.7 That level of shortfall potentially poses a risk to the Plan being found sound when subject to examination. As such, Wates would invite RDC to consider whether additional allocations can be made to meet a greater share of identified housing need.

Proposed Site Allocations in Battle

Q36. Do you have any comments on the proposed site allocations in Battle, detailed in Policies BT1 to BT11?

- 3.8 Wates provides its response to the draft Policy BT2 below. For ease of review, these follow the order of the policy criteria (1 to 14) and the supporting text presented in the consultation document.

Policy Requirement 1.

- 3.9 Draft Policy BT2 requires development proposed on the site to: *'Form part of a comprehensive scheme to be developed in conjunction with the adjoining, larger, plot of land to the south within Hastings borough. A stand-alone development on the area of land within Rother district will not be accepted.'*
- 3.10 Wates understands from the policy's supporting text that the rationale for this criterion is that development, at Breadsell, should be of a scale sufficient to address infrastructure requirements and enhance the site's accessibility. The evidence base is also clear that Hastings and Rother have obvious functional linkages and are assessed (in the HEDNA) as forming a single Housing Market Area (HMA).
- 3.11 Accordingly, Wates can confirm that it intends to prepare an application across its land interests and is open to coordinating with adjoining parties. The accompanying Vision Document (**Appendix 2**) sets out Wates' emergent masterplanning approach and confirms that a cross-boundary strategy is envisaged.

Policy Requirement 2.

- 3.12 This expects the proposed development to *'provide a policy-compliant amount of on-site affordable housing in line with policy HOU2 of the Rother Local Plan'*.
- 3.13 At the present time, the proposed wording of Policy HOU2 has not been published by RDC, and therefore, Wates cannot say for certain if 'Requirement 2' would enable a viable development at the site. Nonetheless, Wates agrees that the Plan's policies, generally (and BT2 in particular), should ensure that affordable housing is secured on-site.
- 3.14 Viability matters will require careful assessment as both RDC's and HBC's Local Plans develop. Wates highlights that, although the site is greenfield, preventing adverse impacts on the SSSI may necessitate a relatively complex surface-water drainage strategy. Additionally, further examination of potential constraints related to site levels and ground stability (via appropriate survey efforts) will be needed (as highlighted in HBC's current consultation).
- 3.15 Therefore, without a specified target level of affordable housing, it is difficult for Wates to determine if 'Requirement 2' can be satisfied at this stage. Moreover, RDC will need to consider (in collaboration with HBC) how infrastructure contributions should generally be addressed for this cross-boundary allocation, noting that Rother District has adopted a Community Infrastructure Levy (CIL) Schedule, while HBC has not. These matters will need to be reviewed as both Plans progress towards Examination. Wates will aim to provide both Councils with further information to support this.

Policy Requirement 3.

- 3.16 This indicates that development at the site is to *'be informed by a landscape sensitivity assessment to determine an appropriate layout, form and detailed design to ensure the conservation of the setting of the adjacent High Weald National Landscape'*.
- 3.17 Wates has no objection to this policy requirement, as it will be important for the proposed development to appropriately mitigate potential impacts on the character of the adjacent National Landscape. Clearly, the land's topography and notable landscape features (such as Ancient Woodland) also merit careful consideration.
- 3.18 To that end, a comprehensive Landscape Visual Impact Assessment (LVIA) will be submitted with any forthcoming application for residential development on the site, which will adequately assess the impact of the proposal on the National Landscape. The LVIA's findings will inform the design of a landscape-led scheme that positively responds to the site's topography and the surrounding land, and incorporates any necessary mitigation measures.

3.19 Policy Requirement 4.

Draft Policy BT2 requires development to *'be carried out in accordance with the recommendations of ecological and hydrological surveys (to be completed) to ensure the protection of the nearby Marline Woods Site of Special Scientific Interest'*.

- 3.20 To provide both councils with the necessary comfort that a residential development can be delivered at the site without adversely impacting on the Marline Woods SSSI, Wates (in 2025) instructed a Hydroecological Assessment of Breadsell Farm, as prepared by consultants Hilson Moran (appended to these Representations at **Appendix 3**).
- 3.21 This report clarifies that a Hydroecological Study (previously prepared and shared with Natural England) resulted in recommendations for a detailed one-year water monitoring programme, supported by an outline-stage surface water drainage strategy that will limit any disturbance to the neighbouring SSSI and its associated Ancient Woodland and bryophyte populations.
- 3.22 Infiltration testing conducted in December 2025 (with further testing scheduled throughout the year) aims to gather the necessary physical and qualitative data on surface water, groundwater, and soil conditions to support a sensitive development of the site for housing. Wates agrees with the proposed wording of 'Requirement 4' and will continue collaborating with both RDC and HBC to provide all relevant information.

Policy Requirement 5.

- 3.23 Draft Policy BT2 requires development at the site to *'include a new vehicular access from Hastings Road A2100 to the satisfaction of the Highway Authority'*. Wates agrees that a new access from the A2100 is necessary and has commissioned transport consultancy iTransport to design a safe junction with the A2100, capable of accommodating the proposed development at the scale outlined in RDC's Policy BT2 and aligned with HBC's equivalent proposals.

- 3.24 The Transport Delivery Note (TDN), found in Appendix 4, evaluates the viability of a simple priority T-junction by analysing observed traffic flows and the anticipated traffic generation of the proposed scheme. The junction model outputs demonstrate that a simple T-junction would operate with ample spare capacity.
- 3.25 Within the TDN, although it is not considered necessary for capacity purposes, the feasibility of a ghost island arrangement has also been explored. With very minor road widening, this arrangement would enable an improved pedestrian and cycle crossing over the A2100 Hastings Road whilst providing safe and suitable access to the site for drivers. The TDC also demonstrates that there is sufficient frontage along A2100 Hastings Road to provide a separate emergency access.
- 3.26 On this basis, Wates is satisfied that a new vehicular access can be delivered at the site to serve a future housing development.

Policy Requirement 6.

- 3.27 This requires development to *'include new pedestrian and cycle links to Hastings Road A2100 and to adjoining land within Hastings borough to the south-west'*.
- 3.28 In principle, Wates has no objection to the inclusion of this requirement as it is appreciated that for a sustainable residential development to be delivered at the site, highway enhancements, which provide opportunities for walking and cycling to Baldslow and the settlements further afield, will be a necessary element of the scheme.
- 3.29 The TDN (**Appendix 5**) states that a key aspect of the Sustainable Transport Strategy for the site will be a masterplan layout which prioritises cyclists and pedestrians. As shown on the emerging scheme design (within the Vision Document, **Appendix 2**), it is envisaged that the development will feature a continuous pedestrian/cycleway north to south and improvements to the footway, including widening, along the Hastings Road to the east of the site, leading into Baldslow. A dropped kerb crossing facility at the site access, with a central refuse island, will also be proposed to provide a safer crossing for pedestrians and cyclists to access the existing footway.
- 3.30 On the matter of whether it is feasible to provide pedestrian and cycle links through the site, Wates certainly expects there to be connections between the land situated within Rother and Hastings respectively, to facilitate movement through the development parcels and areas of open space. However, the feasibility of achieving further / upgraded pedestrian connections through the Ancient Woodland (i.e., towards Hastings) will need to be further tested, given the area's ecological sensitivity.

Policy Requirement 7.

- 3.31 As drafted, Policy BT2 requires development *'to include any off-site highway improvements necessary to make the development acceptable, in accordance with the requirements of the Highway Authority, including improvements to pedestrian, cycle and bus infrastructure'*.
- 3.32 As previously outlined, Wates expects to provide improvements to the footpath on Hastings Road leading into Baldslow as part of a proposed development at the site. Additionally, the

Sustainable Transport Strategy outlined in the TDN also anticipates contributions towards cycle improvements. It is expected that this would benefit routes HS19 and HS23 along The Ridge West and Battle Road, respectively. Wates is therefore willing to contribute to necessary highway improvements, including local bus infrastructure, where these can be demonstrated to meet the tests under the CIL Regulations.

Policy Requirements 8

- 3.33 This requires development to *'include significant areas of green infrastructure, to include public open space and areas for biodiversity net gain across the site, as informed by the landscape sensitivity assessment'*.
- 3.34 Wates' vision for the site is to develop a masterplan that is landscape-led, with green infrastructure as a key component of the development. The new green infrastructure will be multifunctional, offering broader benefits, while the arrangement, design, and embedded features of the development will enhance resilience and adaptation, including achieving biodiversity net gains. Indeed, Wates considers this good practice for designing any high-quality development.
- 3.35 The emerging design has benefited from the input of a multidisciplinary team, and the final site layout plan submitted with a forthcoming planning application will be informed by a development-specific LVIA and a wider Green Infrastructure Strategy. Wates are therefore supportive of this particular requirement.

Policy Requirement 9.

- 3.36 Drafted Policy BT2 requires development at site to *'include provision for the retention and future management of a buffer zone of semi-natural habitat, at least 15 metres wide (which does not include residential gardens), on the southern boundary, between the edge of development and the ancient woodland'*.
- 3.37 Wates recognises that the Ancient Woodland is an irreplaceable habitat that significantly contributes to biodiversity and the landscape character of the area. Therefore, an appropriate buffer to protect the woodland from harm has been included in the masterplan from the earliest stages of the design process. A 15m buffer aligns with Natural England's current guidance, but it is important to note that land within this buffer could potentially be used for SuDs, open space, and other Green Infrastructure as part of an overarching strategy (subject to an assessment of root protection areas, etc), without detriment to the Ancient Woodland.
- 3.38 Wates, therefore, are supportive of this aspect of draft Policy BT2, but suggest that the wording be modified to allow for "other forms of appropriate Green Infrastructure".

Policy Requirement 10

- 3.39 This criterion pertains to retaining and enhancing the existing hedgerow and trees on the south-eastern boundary of the site. Wates appreciates that these landscape features contribute positively to the site's landscape and rural character, and therefore merit protection in any proposed development.

- 3.40 An Arboricultural Impact Assessment (AIA) will support a future planning application, and new planting will be proposed as part of a Landscape Strategy.

Policy Requirement 11

- 3.41 Regarding the management of flood risk at the site, Policy Requirement 11 expects development to *'be carried out in accordance with the recommendations of a Flood Risk Assessment (FRA) across the site'*.
- 3.42 According to the Environment Agency (EA) mapping, most of the Site is in Flood Zone 1 ('low probability'). However, some areas of flood zones 2 and 3 are located near the Marline Valley Stream within Coneyburrow Wood, Birchen Wood, and Four Acre Wood. Additionally, there are three ponds on Wates' land, and the EA mapping highlights areas at risk of surface-water flooding. The site is also in an area classified as having material groundwater sensitivity.
- 3.43 Whilst these constraints do not represent a fundamental impediment to the site's suitability for development, Wates agrees that all sources of flood risk will need to be suitably managed as part of a proposed development through an effective drainage strategy, informed by a comprehensive and robust Flood Risk Assessment. The Hydroecological & Drainage Technical Note (**Appendix 4**) explains how flood risk could be managed on the site as part of the proposed development.
- 3.44 The Drainage Strategy, summarised in Section 2 of the Technical Note and illustrated in Figure 2, proposes that surface water runoff is to be attenuated within SuDS features, including detention basins and attenuation ponds, which are distributed throughout the scheme. Swales and filter strips are to be used to convey runoff. It is proposed that this runoff be discharged to the Marline Valley Stream. This approach has been identified by Hilson Moran as consistent with the overall hydro-ecological strategy to ensure no adverse effects on the SSSI.
- 3.45 With the proposed strategy in place, Hydroecological & Drainage Technical Note (**Appendix 4**) explains that the runoff rates will be restricted to the existing 1 in 100-year greenfield runoff rate. This means development at the site can be delivered in accordance with paragraph 170 of the Framework, which advises that development in areas at risk of flooding should be made safe for its lifetime without increasing flood risk elsewhere.
- 3.46 Based on the assessments already carried out, it is likely that flood risk can be effectively managed through SuDS incorporated on the site. Wates has no concerns with this proposed criterion of draft Policy BT2.

Policy Requirement 12

- 3.47 This criterion stipulates that sustainable drainage measures should be located in the southern section of the site in accordance with Policy ENV2 of the Rother Local Plan.
- 3.48 Wates is unclear why this proposed criterion is needed, and suggests instead that the SuDS strategy for the site is left to the decision-taking stage, following appropriate technical assessment. There also appears to be a conceptual overlap between 'Requirement 12 and Requirement 11'.

- 3.49 More generally, Wates considers that the drainage strategy for the site should be designed to function holistically across RDC's and HBC's administrative boundaries, and indeed this will be necessary to appropriately manage the hydroecological environment.
- 3.50 Wates would therefore suggest that this part of the draft policy be revisited and potentially omitted.

Policy Requirement 13

- 3.51 This criterion relates to foul water infrastructure and requires development at the site to *'provide a connection to the sewerage system at the nearest point of adequate capacity, as advised by Southern Water and ensure future access to the existing sewerage and water supply infrastructure for maintenance and upsizing purposes'*.
- 3.52 While Wates has no fundamental objection to including this requirement, it is not entirely clear why it should be specifically included within Policy BT2, given that other policies in the emerging Plan already aim to address infrastructure matters.
- 3.53 Notwithstanding this, Wates certainly agrees that development at the site should be designed to allow unobstructed access to the sewerage and water supply infrastructure for maintenance and upgrades. Indeed, this is good practice when designing any high-quality scheme.

Policy Requirement 14

- 3.54 This criterion of draft Policy BT2 requires development to be *'informed by agreed land stability and geotechnical reports'*, and based on the supporting text, it is understood that this is included as part of the policy to align with the position of Hastings Borough Council (HBC).
- 3.55 As part of its emerging Plan, HBC proposes to require these assessments to be submitted with planning applications for all sloping sites and relevant developments. Wates has no objection to including this requirement as it is deemed reasonable.

Q68. Do you have any comments on the Interim Sustainability Appraisal in support of the Regulation 18 stage consultation on the Development Strategy and Site Allocations (January 2026)?

- 3.56 The Interim Sustainability Appraisal (SA) sets out a high-level assessment of draft Policy BT2 and the proposed allocation at Breadsell. Wates recognises that the SA evaluation of the site includes a number of 'neutral/unknown' scores, in addition to several 'minor negatives' and 'minor positive' scores, and a small number of 'major adverse' scores.
- 3.57 At SA paragraph 4.38, it is explained that the SA analysis is 'policy off'. In turn, this means that the SA's analysis of draft Policy BT2 does not yet apply the mitigation measures that Wates would expect to form part of its proposals, and which are indeed also anticipated by the requirements of the draft policy.
- 3.58 In the case of Policy BT2, it is reasonable to expect that the SA scoring related to biodiversity will significantly improve once the hydro-ecological survey work is completed. Similarly, the proposed allocation within Rother depends on the corresponding allocation within Hastings'

administrative area, and thus, it is predicated on a much greater scale of growth. Consequently, measures to enhance connectivity and promote sustainable travel (as enabled by development 'at scale') will also boost Policy BT2's scoring in this subject area.

- 3.59 As the SA is further refined ahead of the next Local Plan consultation, it would be helpful to establish a combined set of effects (against SA objectives) for the Breadsell Growth Area as a whole, across administrative boundaries, rather than separately for the Rother and Hastings parts. This should be feasible, as the SA methodology is already aligned for both Local Authorities and the SA work has clearly been jointly commissioned. Such an approach may assist the Inspector(s) when the proposals at Breadsell are considered at a future Examination.

4. CONCLUSION

- 1.1 These representations have been prepared by Boyer on behalf of Wates Developments in response to RDC's Draft Local Plan Regulation 18 'Development Strategy and Site Allocations' consultation.
- 1.2 Wates welcomes the preparation of a new Local Plan for the Rother District, which will contribute to the provision of new housing and future sustainable development. Wates also supports the proposal to allocate Land at Breadsell, as set out in draft Policy BT2, and as part of a wider cross-boundary strategy for growth to the northwest of Hastings. Wates is committed to working with officers at RDC and HBC to provide both councils with all necessary evidence and information to demonstrate the site's suitability and deliverability.
- 1.3 These representations also comment on the Plan's proposed approach to density. Whilst it is recognised that achieving increased density is an objective supported by national planning policies, this needs to be balanced with an understanding of what may be achievable in practice when taking account of a site's characteristics and constraints. It is welcomed that RDC seeks an average density of 35 dph in Policy BT2, albeit Wates considers that 40 dph is likely the achievable average across the cross-boundary Breadsell Growth Area as a whole.
- 1.4 Wates would still remark that the Plan's proposed housing requirement/target still falls short of the LHN identified through the Standard Method, although Wates recognises that statutory constraints and designations prevail across parts of the Plan Area. In this context, the justification for proposed cross-boundary growth at Breadsell is especially compelling, as it is located beyond the National Landscape. Similarly, Wates agrees that Rother and Hastings have been correctly identified as part of a joint HMA, which further supports the respective Plans' cross-boundary strategy at Breadsell.
- 1.5 Wates remain committed to working with both RDC and HBC to further develop their proposals for the site.

APPENDIX 1 – LOCATION PLAN

