



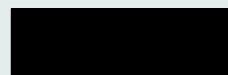
Rother Local Plan 2025-2042

(Regulation 18) Version

March 2026



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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 within Rother which are being promoted through the emerging Local Plan. Several of these sites are identified as allocations within the plan, these include:

- Land east of Watermill Lane (BEX 34);
- Land north of A2691 NBAR (east), Bexhill (BEX 36);
- Land north of Rosewood Park, Gotham Farm, Bexhill on-Sea (BEX 23); and
- Land south of Whydown Road (BEX 24).

1.1.4 We support the allocation of these sites and further details on each is set out in Section 2.4.

1.1.5 We are also promoting Land at Gotham Farm (west), Sandhurst Lane, Bexhil (BEX 0206). This is not proposed to be allocated at this time, but we have sought to address the reasons stated why through our representations. Further information is provided in Section 2.4.

1.1.6 The sites listed above are all available, suitable, and deliverable for housing.

1.2 National Planning Policy Framework

1.2.1 The National Planning Policy Framework ('NPPF' or 'the Framework') sets out the Government's planning policies for England and how these should be applied within which plan-making and decision-taking. The NPPF requires plans to set out a vision and a framework for future development and seek to address the strategic priorities for the area. Local Plans should be prepared in line with procedural and legal requirements and will be assessed on whether they are considered 'sound'.

1.2.2 The National Planning Policy Framework sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:

- **Positively prepared** – The plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- **Justified** – The plan should be an appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.
- **Effective** – The plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – The plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

1.2.3 The NPPF reaffirms the Government's commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas which they are responsible for, to address housing, economic, social and environmental priorities and to help shape the development of local communities for future generations.

2 ROTHER LOCAL PLAN

2.1 Context

2.1.1 The Draft Rother Local Plan (RLP) consultation 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.

2.1.2 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.

2.2 Housing Requirement

Q2. Do you have any comments on the Council's proposed housing target for the Local Plan of 8,427 dwellings over the 17-year plan period, or 495 dwellings annually?

2.2.1 The proposed housing requirement leaves a shortfall against identified housing needs of over 7,000 homes. This adds to the growing unmet housing needs of East Sussex. As the Council will no doubt be aware across East Sussex the shortfall in meeting housing needs arising from plans currently in preparation is over 2,000 dwellings per annum (dpa). Over the plan period 2025 to 2042 this would lead to near 36,000 fewer homes that are needed to address the housing crisis in this area.

2.2.2 This is not sustainable and will lead to significant shortfalls in both market and affordable housing, placing increasing pressure on housing markets that are already under significant stress.

2.2.3 Gladman consider that a further sifting of sites will be necessary to determine whether any additional needs can be delivered. In this regard, Land at Gotham Farm (west), Sandhurst Lane, Bexhill (BEX 0206) is not proposed for allocation. This site could help contribute to the housing needs of the area.

2.3 Development Strategy

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

- 2.3.1 Whilst we would agree that density of sites should be optimised to make the most of a site's development potential, it will be important that the proposed densities suggested are not applied too rigidly and are applied in the context of each sites ability to accommodate development.

Q8. Do you have any comments on the Council's proposed Overall Development Strategy?

- 2.3.2 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.
- 2.3.3 The draft Local Plan states that this is a landscape-led spatial strategy that will deliver a minimum of 7,991 dwellings over the plan period. This is over 7,000 dwellings below that which is 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.
- 2.3.4 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 we agree that 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.
- 2.3.5 Gladman consider it essential to recognise the significant impact that not meeting housing needs will have and a more positive approach to meeting housing needs may be required. 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.

- 2.3.6 For example, whilst the character of an area may not lend itself to the delivery of housing it may well be that during the course of the plan period the character changes due to external factors such as the delivery of adjacent development which would then lend itself to development of the site. It is essential to consider whether a site would be suitable within the plan period, and just not at this point in time when allocating sites.

Q9: Do you have any comments on the proposed growth opportunities in the sub-areas as shown in Figure 10?

- 2.3.7 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 will contribute to the timely delivery of housing within the plan period however following a further sifting of sites it may be possible to increase the level of development directed towards the settlement.

Q10. Do you have any comments on the proposed Vision and development strategy for Bexhill, including the development figures shown in Figures 13 and 14?

- 2.3.8 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.

- 2.3.9 When determining the final quantum of development proposed to the town it is essential that the entirety of the plan period is considered, sites that may not be considered appropriate for development right now may be within the plan period.

2.4 Site Allocations

Q17. Do you have any comments on the proposed site allocations in Bexhill?

- 2.4.1 We are promoting a number of sites around the town that have been proposed for allocation. We support the identification of each site and have provided further context on each below. These sites are:

- Land east of Watermill Lane (BEX 34);
- Part of Land north of A2691 NBAR (east), Bexhill (BEX 36);
- Land north of Rosewood Park, Gotham Farm, Bexhill (BEX 23); and Land south of Whydown Road (BEX 24).

Land east of Watermill Lane (BEX 34)

2.4.2 This site is allocated in the adopted Local Plan. Gladman has submitted an outline application (RR/2025/699/P) on part of this site for 99 dwellings, which is currently pending consideration expected to be determined by delegated powers in the near future.

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

Land north of A2691 NBAR (east), Bexhill (BEX 36)

2.4.4 Gladman are promoting the eastern half of this proposed allocation and support its identification. We will continue to demonstrate why it is a suitable location for housing growth and we would appreciate the opportunity to discuss this site with the Council.

Land north of Rosewood Park, Gotham Farm, Bexhill (BEX 023)

2.4.5 This site received a resolution to grant planning permission in June 2025. Positive progress is being made with the signing of the S106 agreement and this is expected to be signed in the near future.

2.4.6 We support the recognition of this by the identification of the site for allocation within the Local Plan.

Land south of Whydown Road (BEX 24)

2.4.7 Gladman support the identification of this site for the development of 68 dwellings. We will continue to demonstrate why it is a suitable location for housing growth and if any further information is required by the Council we would be happy to provide this.

Q18. Do you consider that there are any other possible sites in Bexhill which should be allocated in the Local Plan?

- 2.4.8 Gladman are promoting land in Bexhill, Land at Gotham Farm (west), Sandhurst Lane, Bexhill (BEX 0206) that is not currently proposed for allocation. Further information on why we disagree with the Council's current assessment of this site is provided below. We consider that the Council's concerns can be addressed and that the site is capable of coming forward in the plan period.

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

- 2.4.9 The site can be identified in the HELAA as 'BEX0206' which is a HELAA 'Rejected Site'. In response to the current HELAA assessment we have been working with our consultant team to address the comments and reason for current rejection of this site. Full technical notes in relation to both Highways and Landscape matters are appended to this representation but are summarised below.
- 2.4.10 In terms of landscape, the site is not covered by any statutory or non statutory landscape designation and it is not considered an area of strong rural character due to the presence of Kloofs Caravan Park and the adjacent consented development. Overall, it is considered that the site and local context has the ability to absorb change in the form of a suitably well-designed residential development, subject to further assessments, appropriate green infrastructure proposals and that this would not result in unacceptable long-term harm to local landscape character and visual amenity.
- 2.4.11 In terms of highways, initial work has been undertaken to understand how the site could be accessed. It is proposed that the site could be accessed through the adjacent approved scheme with the upgrade of the internal roads to serve this site. The proposed arrangement could facilitate a slight realignment of Sandhurst Lane within the site frontage to improve visibility whilst not changing the character of the road itself.
- 2.4.12 The site would also benefit from the adjacent scheme proposed community/retail facilities.

- 2.4.13 Based on initial assessment and local knowledge, the site is appropriately connected to the existing transport network and is capable of accommodating development without giving rise to significant transport constraint. In principle, and subject to more detailed assessment at the planning application stage, there are no transport related reasons why the site should not be considered suitable for allocation.
- 2.4.14 Gladman request that previous conclusions are reassessed and that the site is allocated for development within the next stage of the emerging Local Plan. We would welcome discussion with the Council regarding this site.

3 CONCLUSIONS

3.1 Summary

3.1.1 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 2024) and the associated Planning Practice Guidance.

3.1.2 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.

3.1.3 Gladman have land interests within the plan area, and submissions have been made in Section 2.4. We support the identification of:

- Land east of Watermill Lane (BEX 34);
- Part of Land north of A2691 NBAR (east), Bexhill (BEX 36);
- Land north of Rosewood Park, Gotham Farm, Bexhill (BEX 23); and
- Land south of Whydown Road (BEX 24).

3.1.4 Gladman are promoting land in Bexhill, Land at Gotham Farm (west), Sandhurst Lane, Bexhill (BEX 0206) that is not currently proposed for allocation. We have responded to the assessment and reasons for rejection of this site. We request that the conclusions are reconsidered and this site included as an allocation in the next stage of the Local Plan.

3.1.5 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.

APPENDIX 1 – TRANSPORT NOTE – BEX0206



TRANSPORT NOTE

To: **Gladman Developments Ltd**
From: **Iceni Projects Ltd**
Date: **March 2026**
Title: **Land at Gotham Farm (west), Bexhill**

a. Introduction

1. This Transport Note has been prepared by Iceni Projects to provide a high-level review of Land at Gotham Farm (west) Sandhurst Lane, Bexhill (REF: BEX0206) and its surrounding transport context in relation to its potential allocation for residential development in the Rother District Council Local Plan.
2. The review has considered potential access arrangements for a range of transport modes. In relation to vehicular access, an initial review suggests that the formation of a priority junction directly onto Sandhurst Lane is unlikely to be appropriate given the characteristics and nature of the road (narrow country lane).
3. However, it appears feasible that the emergency access associated with the approved scheme Rosewood Park - Land North Of, Bexhill REF: RR/2023/1721/P (hereafter referred to as Rosewood Park) development could be upgraded and the internal road extended to serve the BEX0206 site. This arrangement could facilitate a slight realignment of Sandhurst Lane within the site frontage to improve visibility whilst not changing the character of the road itself.
4. Pedestrian and cycle access could also be provided via the Rosewood Park development, which has planning permission for a highly permeable layout including both on-carriageway and leisure routes. These routes could be extended to serve the BEX0206 site.
5. A stage 1 technical design of the access would be developed at the planning application stage and would be supported by a Stage 1 Road Safety Audit.
6. The site is suitably located with access to the new community/retail facilities proposed within the Rosewood Park scheme proposals.
7. There is scope to extend the Digital Demand Responsive Transport (DDRT) scheme to serve this site and the EV car hire club is suitably sized to cater for the additional residents this scheme will generate.
8. In terms of development traffic, vehicle movements would be expected to route through the Rosewood Park development to the south, connecting to Barnhorn Road via the existing signal-controlled junction. A review of the information submitted in support of the approved scheme indicates that spare capacity was identified at this junction and it is therefore likely that it could accommodate some additional traffic. A more comprehensive assessment of the local highway network would be undertaken as part of any future planning application.

9. Liaison with National Highways is likely in relation to the A259/Chestnut Walk roundabout and the A259/London Road signals.

10. Based on this initial assessment and local knowledge, the site appears to be appropriately connected to the existing transport network and capable of accommodating development without giving rise to significant transport constraints. In principle, and subject to more detailed assessment at the planning application stage, there are no transport-related reasons why the site should not be considered suitable for allocation.

APPENDIX 2 – LANDSCAPE TECHNICAL NOTE BEX0206

TECHNICAL NOTE: LANDSCAPE RESPONSE

Gladman Developments Ltd

HELAA site BEX0206, Land at Gotham Farm (west), Sandhurst Lane, Bexhill

March 2026

1.0 INTRODUCTION

- 1.1 The following Technical Note is provided as a response to the identified BEX0206, Land at Gotham Farm (west), Sandhurst Lane, Bexhill site within the draft Housing and Economic Land Availability (HELAA) and Site Selection Methodology Background Paper, dated January 2026. The HELAA contains comments relating to landscape and visual matters.
- 1.2 The following Note has been prepared by FPCR Environment and Design Ltd (FPCR) who are the landscape consultants for the Land north of Rosewood Park, Bexhill site and prepared the Landscape and Visual Appraisal (LVA) that supported the outline planning application
- 1.3 FPCR is a multi-disciplinary environmental and design consultancy established over 60 years, with expertise in architecture, landscape, ecology, arboriculture, urban design, masterplanning and environmental impact assessment. The practice is a member of the Landscape Institute and Institute of Environmental Management and Assessment and is frequently called upon to provide expert evidence on landscape and visual issues at Public and Local Plan Inquiries.

HELAA Potential Sites

- 1.4 The identified site Land at Gotham Farm (west), Sandhurst Lane (BEX0206), Bexhill within the HELAA is located adjacent to the consented Rosewood Park Development (BEX0237) to the north.

Landscape Response

- 1.5 The following responds to the specific landscape and visual matters raised in the HELAA in relation to site BEX0206.

'This is a sloping field on the western side of Sandhurst Lane. The site is within an area of strong rural character with only scattered development, small fields and areas of woodland. Development here would be harmful to the rural character and landscape of the locality. Furthermore, it is in an unsustainable location in the countryside to the north-west of Bexhill, a significant distance from services. It can only be accessed via a narrow, winding lane with no footways, with no obvious scope for improvement. Initial Highway Authority advice suggests that an access through site BEX0159 (subject to planning permission) would be problematic, requiring a signal-controlled junction and significantly changing the character of the rural lane. New residents would be highly car-reliant. Additionally, there is an area at risk of flooding on the western boundary of the site which extends to the south, and an adjoining area of Priority Habitat to the south-west. While the character of the locality will change with the development of sites on the opposite side of Sandhurst Lane, at the present time the site is not considered suitable for development.'

- 1.6 The site is an irregular shaped field that is bordered by dense vegetation with Kloofs caravan park located to the north, Sandhurst Lane to the south east and a minor watercourse located to

the west. The higher contours of the site are located adjacent to the Kloofs Caravan Park to the north and the lower contours of the site are located at a similar level to the adjacent Sandhurst Lane, before sloping down to the adjoining watercourse on the western boundary.

- 1.7 We disagree that the site is in an area of strong rural character, some positive landscape features are present, while the site is located adjacent to the Kloofs Caravan Park to the north and the site is located adjacent to the consented development for 340 dwellings BEX00237 to the south.
- 1.8 The BEX0206 site is not located within any local strategic gaps as outlined within the Rother District Council Local Plan Core Strategy. The site is also not covered by any statutory or non-statutory landscape designations such as National Landscapes (AONB) or National Parks. There are no heritage designations such as scheduled monuments, conservation areas or listed buildings within or adjacent to the site. Within the East Sussex Landscape Character Assessment (2016), the site is located within the Landscape Character Area (LCA) 'South Slopes of High Weald', located to the south east of the LCA, BEX0206 is of a relatively modest scale and nature in the context of the broader LCA.
- 1.9 To facilitate site access it is proposed that the emergency access of the BEX00237 development would be upgraded to provide the primary access to the BEX0206 site. Highway works will upgrade the access arrangements and could give priority access from the BEX0206 site to the north to the consented BEX00237 site to the south, with Sandhurst Lane becoming the secondary priority at the vehicular junction.
- 1.10 The new primary vehicular route will provide access from BEX0206 through the Rosewood Park Development, via the retail and community facilities and towards Brooklands Road and the Barnhorn Road junction to the south. While there will be changes to the highways of Sandhurst Lane when located adjacent to BEX0206 and BEX00237 these localised improvement to the highway along Sandhurst Lane will preserve the wider existing character of Sandhurst Lane, with traffic rerouted through Rosewood Park, preserving the narrow winding lane character of Sandhurst Lane.
- 1.11 We disagree that the site is an unsustainable location. The consented development for 340 dwellings BEX00237, will provide direct pedestrian/cycle links and a vehicular route through the development to the proposed retail and community facilities, that will be located approximately 380m to 600m to the south.
- 1.12 Development will be kept off the higher contours of the site to the north, providing an offset to the Kloofs caravan park and an offset will also be provided to the watercourse to limit any potential flood risk and offset from the priority habitat to the south-west. The site is bordered by surrounding tree and hedgerow boundaries and visual receptors across the area are limited, due to distance, topography and intervening built form and vegetation in the context surrounding the site.
- 1.13 It is considered that the site and local context has the ability to absorb change in the form of a suitably well-designed residential development, subject to further assessments, appropriate green infrastructure proposals and that this would not result in unacceptable long-term harm to local landscape character and visual amenity.

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