



Planning Policy
Rother District Council
Town Hall
Bexhill-on-Sea
TN39 3JX

23 March 2026

ROTHER LOCAL PLAN 2025–2042 DEVELOPMENT STRATEGY AND SITE ALLOCATIONS REGULATION 18 CONSULTATION

PART 3, CHAPTER 7 – SITE ALLOCATIONS, QUESTION 17

Dear Sir/Madam,

This representation has been prepared on behalf of Persimmon Homes South East in response to the Rother District Council ('RDC' or 'the Council') Development Strategy and Site Allocations (Regulation 18) consultation, which runs until 23 March 2026.

RDC is preparing a new Local Plan to set out a strategy for development across the District for the period to 2042. Once adopted, the new Local Plan will update and replace Rother's Core Strategy (2014) and Development and Site Allocations (2019) Plans.

This Regulation 18 consultation now seeks views on the proposed site allocations which have been identified to deliver the updated spatial strategy and some area-specific policies related to the options for strategic growth.

The purpose of this representation is to support the growth identified for Bexhill and in particular the inclusion of 'Land west of Fryatts Way' (draft Policy BX14), 'Land off Spindlewood Drive' (draft Policy BX20) and 'Land north of Barnhorn Manor Caravan Park' (draft Policy BX21) which are being delivered by Persimmon Homes as set out below. It seeks to comment on the scope of the draft policies and on the proposed spatial strategy more generally.

Housing Land Supply

The number of homes identified as new and updated draft allocations has increased considerably since the April 2024 consultation, rising from 2,129 to 5,051 dwellings. This brings the total housing figure for the Plan period accounting for all sources of supply to 8,427 homes over the 17-year Plan period, equating to 495 dpa.

This is recognised to be a considerable increase in potential housing supply when compared to the adopted Core Strategy figure (355 dpa). However, at the time of writing, the Government's standard method figure for Rother sets a minimum target of 912 homes per annum, equating to a Plan period need of 15,504 homes. The Framework is clear that the standard method figure should be used to determine the minimum number of homes



needed, along with any needs that cannot be met within neighbouring areas which should also be taken into account in establishing the amount of housing to be planned for.

Even without accounting for unmet needs from neighbouring authorities, at this stage the Local Plan would underdeliver annually by 417 homes, resulting in a shortfall of some 7,077 homes across the Plan period. This is even before a suggested minimum buffer of 5% for non-implementation is included, which would result in a shortfall of 775 dwellings.

Therefore, we urge the Council to take each and every opportunity to allocate suitable sites.

Spatial Strategy - Bexhill

The proposed spatial strategy is strongly supported, particularly in identifying West and North Bexhill as the main areas for growth. This approach strengthens the role of Bexhill-on-Sea as the district's most sustainable settlement. As the largest town, it offers the broadest range of services and facilities, including employment opportunities, education and transport connections. Notably, it is the only settlement classified as "highly sustainable", which supports its designation as the primary focus for significant housing and employment development.

Concentrating growth in this area is both logical and proportionate to the town's size, capacity and access to existing and planned infrastructure. In contrast to other parts of the district, Bexhill is not constrained by nationally designated landscapes, making it the most suitable and deliverable location for growth.

Part 3, Chapter 7 – Site Allocations, Question 17 – Policy BX14 Land West of Fryatts Way

The site is located on the north-western edge of Bexhill, comprising three irregularly shaped fields previously in agricultural use, well related to the existing settlement and well-contained by physical features. Access to the site is located off Fryatts Way, which will be the main vehicular access to the site.

Outline Planning Permission was granted on 6 January 2023 (ref. RR/2021/1656/P) for the following:

"Erection of up to 210 residential dwellings (including up to 30% affordable housing), introduction of structural planting and landscaping, informal public open space and children's play area, surface water flood mitigation, vehicular access point and associated ancillary works. All matters to be reserved with the exception of the main site access."

Subsequently, the Reserved Matters application was approved on 24 December 2025 (ref. RR/2024/2171/P) for the following:

"Reserved matters application for the erection of 210 dwellings, pursuant to outline permission RR/2021/1656/P (allowed on appeal)."

In light of Rother District Council's substantial identified housing need, the residential allocation of land west of Fryatts Way presents a highly deliverable opportunity to support early plan period housing delivery. The site is particularly well placed to contribute meaningfully to the Council's trajectory, given that both Outline Planning Permission and Reserved Matters consent have already been secured. This advanced planning status enables the scheme to proceed to delivery without the delays typically associated with larger or more complex strategic allocations.

The Fryatts Way scheme provides an opportunity to secure the early delivery of a substantial number of dwellings, with the intention of bringing forward housing delivery within the first five years of the plan period. In doing so, it will contribute positively towards the Council's target of delivering at least 7,881 homes by 2042.

This representation is submitted in support of the proposed allocation of the Land West of Fryatts Way as set out within Policy BX14. It reinforces Persimmon Homes' firm commitment to bringing the site forward for residential development at the earliest opportunity.

Policy BX14 allocates the Land West of Fryatts Way for residential development of up to 210 dwellings, including up to 30% affordable housing. The table below summarises the criteria set out within the draft allocation, alongside our response to each requirement.

POLICY BX14 CRITERIA	RESPONSE
<p>1. Provide a policy-compliant amount of on-site affordable housing in line with policy HOU2 of the Rother Local Plan;</p>	<p>Draft policy HOU2 states that the starting point for discussion on the affordable tenure mix is as follows: 25% First Homes, 58% social/affordable rent, and 17% affordable home ownership. It does, however, recognise that the exact tenure mix shall be identified through discussions with the local authority and informed by the latest Government guidance and any relevant local Housing Need Assessment.</p> <p>The approved scheme will deliver 10% Shared Ownership, 25% First Homes, and 65% affordable rent; as requested and agreed as part of the outline planning permission.</p>
<p>2. Deliver public open space, informal recreation areas, and a children's play area;</p>	<p>Persimmon is supportive of this requirement, as demonstrated by the approved landscaping and open space scheme which wraps around the northern, southern and western edges of the site, as well as a central area of open space.</p>
<p>3. Retain and enhance existing hedgerows; provide additional planting, street trees and landscape management;</p>	<p>Persimmon is supportive of this criteria. The scheme will retain and strengthen the existing hedgerows and trees across the site and along its boundaries through targeted management and supplementary planting. This will include new areas of meadow grassland, hedgerows, street trees, and native scrub and woodland, thereby reinforcing and expanding the site's green infrastructure.</p>
<p>4. Implement a Sustainable Drainage System (SuDS) with at least two stages of treatment, including</p>	<p>The Outline Surface Water Drainage Strategy is confirmed to demonstrate that surface water management can be delivered in a policy-compliant manner to include two stages of treatment to intercept and treat surface water run-off.</p>

POLICY BX14 CRITERIA	RESPONSE
<i>maintenance and management arrangements;</i>	
5. Provide biodiversity enhancements and a Landscape and Ecological Management Plan;	The requirement to provide biodiversity enhancements and a Landscape and Ecological Management Plan (LEMP) is fully supported. These matters are already secured through Condition 21 of the Outline Planning Permission; as such, the development will deliver these outcomes in accordance with both the condition and the emerging Local Plan policy framework.
6. Implement a Construction Environment Management Plan and Construction Management Plan addressing biodiversity, pollution prevention, air quality, noise mitigation, and contamination risks;	The requirement to provide a Construction Environment Management Plan is fully supported. These matters are already secured through Condition 12 of the Outline Planning Permission. As such, the development can deliver these outcomes in accordance with both the condition and the emerging Local Plan policy framework.
7. Undertake an archaeological investigation, including post-investigation assessment, and provide mitigation if necessary;	The requirement to provide an archaeological investigation, including post-investigation assessment, is fully supported. These matters are already secured through Condition 6 of the Outline Planning Permission. As such, the development is capable of delivering these outcomes in accordance with both the condition and the emerging Local Plan policy framework.
8. Provide a sustainable transport package including contributions towards Digital Demand Responsive Transport (DDRT), pedestrian improvements, and reasonable endeavours to establish a car club for a minimum of three years;	The requirement to provide a sustainable transport package, including contributions towards Digital Demand Responsive Transport (DDRT), is supported. The planning obligation includes a contribution towards DDRT.
9. Implement highway works necessary to secure safe site access and protect the strategic highway network;	The requirement to secure safe site access and protect the strategic highway network is fully supported. These matters have already been addressed throughout the planning approval process.
10. Be designed to allow for a vehicular and pedestrian access through the southern boundary to link to adjoining land subject to allocation Policy BX15 of this Plan.	The approved scheme facilitates potential future pedestrian and active travel links to the adjacent land to the south via pedestrian. The approved development proposals will be delivered in accordance with the policy's intended strategic and movement objectives.

As demonstrated in the table above, the approved scheme is compliant with the draft allocation and therefore supports the allocation being carried forward into the new Local Plan.

Part 3, Chapter 7 – Site Allocations, Question 17 – Policy BX20 Land off Spindlewood Drive, Bexhill

The site is allocated for 160 dwellings including 30% affordable, through Policy BEX9 of the DaSA Local Plan. It is also subject to Outline Planning Permission for 160 dwellings (ref. RR/2017/1705/P). An application for approval of Reserved Matters for 146 dwellings is currently under consideration (ref. RR/2023/1202/P).

The site is therefore reallocated under Policy BX20 for residential development comprising approximately 146 new dwellings, reflecting the scheme now being progressed.

On behalf of Persimmon Homes, it is put forward that the site is suitable, available and achievable for development, with the intention of bringing forward housing delivery early within the plan period. As such, the site's continued allocation and its inclusion within the emerging Local Plan is supported.

Part 3, Chapter 7 – Site Allocations, Question 17 – Policy BX21 Land north of Barnhorn Manor Caravan Park, Bexhill

The site lies immediately west of land identified under Policy BX20 and is being promoted by Persimmon Homes. This allocation proposes for residential development of approximately 20 dwellings at a density (indicative) of 40 dph. However, it is considered that the site has the capacity to accommodate at least 30 dwellings when assessed against the proposed density objectives and efficient land use principles.

The site is well related to the built confines of Bexhill and represents a logical and sustainable extension to the western edge of the settlement. It benefits from good access to a range of day-to-day services and facilities, supporting its suitability for residential development.

In the context of the significant housing need within Rother District, as set out above, it is essential that all suitable and available sites are brought forward and allocated to ensure a robust and deliverable development strategy.

The Council must seek to maximise delivery by making effective use of all appropriate sites. On this basis, Persimmon Homes support the proposed allocation of at Land north of Barnhorn Manor Caravan Park, including existing allocated land west of Spindlewood Drive.

Summary

This representation is submitted in continued support of the proposed allocation of the Land West of Fryatts Way (Policy BX14), Land off Spindlewood Drive (Policy BX20), and Land north of Barnhorn Manor Caravan Park (Policy BX21) reaffirming the landowner's firm commitment to bringing these sites forward for residential development at the earliest opportunity.

Yours sincerely,

HYoung

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