

Rother District Council  
Town Hall  
London Road  
Bexhill-on-Sea  
East Sussex  
TN39 3JX

17<sup>th</sup> March 2026

Dear Planning Policy Team,

## Rother District Council – Draft Local Plan 2025-2042 - Regulation 18 Consultation: Development Strategy and Site Allocations - March 2026

CBRE is instructed by Wates Developments in respect of their land interest at Beeches Farm and Land North of Barnhorn Road (Appendix A) which is located within the administrative area of Rother District Council (RDC). Beeches Farm and Land North of Barnhorn Road (hereafter “the site”) is Draft Site Allocation BX27.

We welcome the opportunity to engage with RDC at this stage of the plan-making process and welcome the positive identification of the site as a key site for the delivery of development needs in RDC. We can reaffirm the Council’s conclusions of the HEELA (2026) in respect of the site that it is suitable, available and developable.

As noted by the Council in its consultation document, national coverage of a set of up-to-date Local Plans is a critical component for the Government in seeking to meet its target of 1.5million homes being built within the course of the next parliament. An up to date Local Plan for RDC is a key piece of completing this national jigsaw of local plans.

Wates have commissioned a range of technical and supporting studies in respect of the delivery of the site and will share these with the Council to help inform the masterplanning process for West Bexhill and understanding of the constraints and opportunities associated with the site.

Our response to this consultation is structured as follows:

- 1. Development Strategy and West Bexhill**
- 2. Density**
- 3. Response to Draft Policy BX18**
- 4. Response to Draft Site Allocation BX27**

Wates have submitted representations to other sites within RDC which deal more holistically with matters such as the Sustainability Appraisal (SA) and the Duty to Cooperate which are not discussed in detail within this response. We endorse those wider submissions that have been made by Boyer on behalf of Wates.

## Development Strategy and West Bexhill

In broad terms we are supportive of the approach to the Draft Plan which seeks to direct the significant majority of new housing to Bexhill. Bexhill is the most sustainable settlement for growth, reflected by its high scoring through the Settlement Study (2024), the only settlement in the district to be rated as “highly sustainable”

We are supportive of the approach specifically within West and North Bexhill to consolidate Bexhill as the most sustainable town, within the capacities of the existing transport network. Such an approach is fully consistent with the NPPF (2024) which states at Paragraph 110 that *“significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.”*

We have no specific comments on the Vision for Bexhill and endorse the approach that is taken in the Draft Plan.

## Density

A significant focus for the consultation is the establishment of new uplifts in density to ensure that, against the context of a significant level of unmet need, RDC is doing what it can to maximise density on the sites that it is allocating.

In line with Figure 9 of the Draft Plan, a range of 35 – 55 DPH is assumed for Live Well Locally locations such as the edge of Bexhill. We understand that the range captures the flexibility needed to respond to site-specific circumstances, design aspirations and infrastructure capacity.

Paragraph 5.25 provides further clarification that *“it is important to note that the actual density that will be delivered on sites across the district will be determined on a case-by-case basis, through the development management process and having regard to the adopted Local Plan.”* Furthermore, Paragraph 7.4 states that *“for each site allocation, a development capacity figure is provided. This is an ‘indicative’ figure for the amount of development that the Council considers is appropriate and deliverable on the site. The capacity figure should not be read prescriptively. The ‘actual’ amount of development on a site will be determined on a case-by-case basis through the development management process.”*

We welcome this clarification and would encourage that as the Draft Plan develops towards Regulation 19 that there is a policy that specifically references this (rather than it being left within the supporting text).

We understand that the figures that have been used have been derived by applying a site density figure (in dwellings per hectare) to the ‘developable’ part of the site. The density figure for sites in different areas of the district has generally been informed by findings of the Density Study (2026), also considering individual site constraints, findings of the SA and the assessment of appropriate density options.

From a review of the Density Study (2026), it is noted that schemes such as Horsted Park, Trumpington Meadows, Abode at Great Kneighton, and Ashmere Phase 1 are cited as examples within the Live Well Locally 35–55 dph typology. While these are high-quality schemes, they are characterised by a strongly contemporary geometric form and typically delivered at higher densities than the existing settlement of Bexhill. Building heights also are cited to up to 4 storey which is materially different from the prevailing character of Bexhill.

By contrast, more recent development at Whitefield Way has been delivered at approximately 32 dwellings per hectare, providing a more locally relevant benchmark. This reflects the established suburban grain of Bexhill and demonstrates the practical relationship between height, spacing, and amenity at this scale. The Density Study’s reliance on higher-density precedents therefore risks setting unrealistic expectations, potentially leading to overdevelopment and erosion of the town’s distinct coastal character.

We will work with the Council over the coming months to ensure an appropriate and accurate developable area and site quantum is assumed for the site (appreciating, understandably, that the Council’s work to date is largely based on desk based assessments through the SA). Wates have commissioned ecology, landscape, topographical and drainage studies which have been used to inform and accurate representation of the developable area of the site. These initial studies indicate that the developable area of the site is more likely to be 11.19 hectares (rather than the 50% or 15 hectares currently assumed in Draft Policy BX27).

### Response to Draft Policy BX18

We welcome the approach of RDC to have a broader strategic growth area policy which sets the infrastructure expectations of the area in general and then considers the site specific contributions to this.

We have no specific comments at this stage around the list of infrastructure proposed which would broadly appear to be reflective of the quantum of development proposed in this location. We note that RDC intend to produce further updates to its Infrastructure Delivery Plan (IDP) following the Regulation 18 engagement to ensure that the policy accurately captures infrastructure demand.

### Primary School

In respect of the provision of a primary school, policy states that it should *be “located to enable the maximum proportion of planned new homes within the Growth Area to be within walking distance of it”*. Whilst we agree that this is relevant, this represents just one of a number of factors that will be relevant in looking at the location of the school site. Given the requirement for suitable outdoor provision and the desire to have classrooms at one level, site topography will be an equally relevant consideration in the site selection process. The Council in its HEELA assessment of Beeches Farm notes the topography of the site and this will need to be consider in the context of the proposed school. We welcome the opportunity to engage with RDC and the education authority to ensure the most appropriate site for a primary school is masterplanned in the West Bexhill area.

### Commercial and Social Provision

In respect of the *“provision for commercial units, retail space and/or local shopping within the western part of the Growth Area, with preference given to space suitable for groceries and professional services (such as a post office or banking)”*. Such uses would broadly fall under Use Class E and it is suggested that the policy more appropriately references this. We are unaware of any specific reference in the NPPF (2024) that would prioritise such uses. Against the tests of Paragraph 16 of the NPPF (2024) it is unclear how a decision maker/applicant would be expected to apply this policy in practice as the attractiveness of the unit for the proposed uses would likely be considered as part of the marketing of a unit post the planning approval stage. We are also aware of an existing Post Office at Little Common. The rise of online banking may also preclude the ability to secure such a use within the site.

Similarly, the requirement for *“the provision of a GP surgery”* within the wider West Bexhill area (rather than on site) whilst understood will need to be rephrased to ensure that it meets relevant soundness test. The provision of a GP surgery will ultimately be a consideration as part of a wider assessment as to how health needs are provided in the wider health planning area. As such, a contribution to an expansion of an alternative site/location could be a response and the policy will need to reflect this flexibility. Additional flexibility should be captured in respect of this. Given the requirement for BX25 to deliver a medical centre consistent with the planning permission in place for this site (REF: RR/2022/3018/P) it is unclear how the generic reference in Policy BX18 relates to the provision being planned for in BX25.

It is unclear why for the site allocations for the West Bexhill Area (BX19 – B28) there is an inconsistent use of the following element of the policy:

*“Accord with Policy BX18 of this Plan (West Bexhill Growth Area – Infrastructure Policy) in terms of including direct provision of and/ or financial contributions towards all necessary infrastructure to serve the development along with development in the wider West Bexhill area.”*

Whilst we would anticipate and expect that not all sites will contribute equally to the overarching provision of infrastructure, there should be a clear acknowledgement that all will contribute. For example, smaller allocations that currently do not currently have this policy reference will benefit from the education capacity and wider infrastructure improvements that are facilitated by others (such as the site).

**Response to Draft Policy BX27 – Beeches Farm and Land North of Barnhorn Road**

We would agree with the positive assessment that has been undertaken by the Council on the site through the HEELA (Site - BEX0219). The only negative comment in respect of the site flagged by the Council is *“potential issues with the site relate to the access, and the distance to existing services and facilities.”*

As part due diligence on the site iTransport have reviewed the site in the context of the draft policy wording. They have worked up a deliverable site access solution for the site. They agree with the Council that the allocation of a primary school within the West Bexhill masterplan area will be needed to ensure that the sites in the West Bexhill masterplan area can promote sustainable development.

Over the page we have included a suggested revision to Policy BX27. The justification for these changes is set out below.

**Density/Quantum**

For the purpose of this response we have not provided a specific comment in respect of the density table which is simply highlighted. As noted previously, detailed technical supporting studies indicate that the extent of developable land is likely to be less than that assumed for the purpose of the Draft Policy.

**Access**

Following a review by iTransport it is necessary for Sandhurst Lane or Coneyburrow Lane to have the ability to be used as an emergency access. This revision is captured in the amended wording.

It is a strong emphasis of the emerging masterplan on the site for it to be landscape led. To this extent early arboricultural work has helped to shape and inform the development extent on the site. To facilitate a safe access it is likely that some vegetation removal will be needed. It is inappropriate and too premature to

determine the extent of this and, as such, it is important that the policy is flexible enough to respond to potential responses and requirements of the highways authority in respect of visibility splays and other technical considerations that will inform the geometry and location of the access. To this end we suggest that the policy is amended slightly whilst retaining the core policy test that any loss is “minimised as far as possible” to place the emphasis and onus for any loss to be fully justified.

### **Open Space**

Following the landscape capacity work undertaken on the site it is likely that a significant amount of the northern part of the site allocation will be left as undeveloped. This is consistent with the policy expectation for a “*substantial area of public open space to be provided*”. Given the landscape context of this part of the site it would be appropriate for the policy to be slightly more flexible in respect of the need to provide formal playing pitches. The formality of the playing pitches could give rise to fencing, lighting etc...which may be at odds with the character/appropriateness in this part of the site. We had made a minor revision to the Draft Policy to capture this.

### **Heritage**

It is a requirement to “*Protect the setting of the Grade II Listed Buildings, Beeches Farm and Sandhurst Lodge, to the east of the site.*” In design terms these are both placemaking assets that the masterplan can appropriately reference and respond to. As setting is not defined, there is potential ambiguity to the requirement to “protect the setting” which could have the effect of artificially constraining the development capacity of the site. It would be more appropriate to ensure that any response is an appropriate response, balancing the need to develop the site and the benefits that come with this with any acceptable harm to setting.

**Site Name: Beeches Farm and Land North of Barnhorn Road, Bexhill**

The site is allocated for residential-led mixed use development comprising:

- a. Some **540** new dwellings;
- b. **A new one-form entry primary school with Early Years nursery provision;**
- c. ~~Local shop(s) which sell fresh fruit and vegetables and offer post office or bank services;~~
- d. Community uses.

Area Type	Live Well Locally
Site Size (Ha)	29.7
Indicative Size of Area for Built Development (Ha)	<b>15</b>
Indicative Residential Density	<b>40 Dwellings Per Hectare</b>

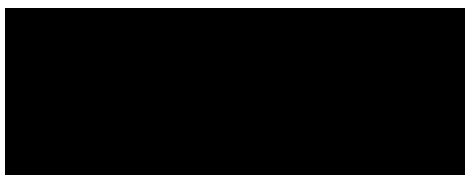
Development on this site must:

- i. Provide a policy-compliant amount of on-site affordable housing in line with policy HOU2 of the Rother Local Plan;
- j. Accord with Policy BX18 of this Plan (West Bexhill Growth Area – Infrastructure Policy) in terms of including direct provision of and/ or financial contributions towards all necessary infrastructure to serve the development along with development in the wider West Bexhill area;
- k. Be informed by a landscape sensitivity assessment to determine an appropriate layout, form and detailed design to ensure the protection of the landscape and character of the countryside to the north and north-east of the site and provide an appropriate edge to built development;
- l. Include vehicular access from Barnhorn Road to include necessary improvements and infrastructure to meet the requirements of National Highways;
- m. Not include vehicular access from Sandhurst Lane or Coneyburrow Lane (**except for emergency access**);
- n. Include new pedestrian and cycle links within the site, linking to existing public rights of way and public highways outside the site, also retaining existing public footpaths within the site;
- o. Provide improvements to existing local bus stop infrastructure and make financial contributions towards improving local bus services;
- p. Include substantial areas of public open space (including play-space and formal playing pitch(es) **where appropriate**, subject to demand) and areas for Biodiversity Net Gain across the site in accordance with Local Plan policy;
- q. Retain and enhance existing hedgerows, field boundaries and mature trees within the site and on the site boundaries, except for any ~~short~~ sections of hedgerow **and/or trees** which are required to be removed to facilitate access, which should be minimised as far as possible;
- r. Incorporate appropriate SuDS in accordance with Policy ENV2 of the draft Local Plan (2024) and an Appropriate Assessment under the Habitats Regulations to demonstrate beyond reasonable scientific doubt that these can be delivered on the site without harming the integrity of the Pevensy Levels Special Area of Conservation/RAMSAR site;
- s. **Provide an appropriate masterplan response to** ~~Protect~~ the setting of the Grade II Listed Buildings, Beeches Farm and Sandhurst Lodge, to the east of the site;

- t. Include an assessment and evaluation of the site's archaeological potential and the implementation of any mitigation measures identified through the assessment;
- u. Provide a connection to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider.

We would be grateful if you could confirm receipt of this response. It would be beneficial to be added to any mailing list (or similar) to ensure ongoing notification of relevant updates to the Draft Local Plan as it progresses. We look forward to continuing to engage with the Council to realise the vision and aspirations for West Bexhill. We look forward to engaging with the Council in the coming months to further develop the masterplan for West Bexhill.

Yours sincerely,



Adam Kindred  
Senior Director  
CBRE Ltd

cc. Lorea Johnston – Wates Development