

Rother District Council
Regulation 18 Consultation

Catesby Strategic Land Limited and Rurban Estates Limited

Policy Reference BX36: Land north of Haven Brook Avenue (east), Bexhill

MWB/HM/37611
March 2026



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CONTENTS

1	INTRODUCTION	3
1.1	OVERVIEW	3
1.2	PLANNING POLICY FRAMEWORK	3
1.3	STRUCTURE OF THE REPRESENTATION	4
1.4	SUPPORTING DOCUMENTS	5
2	DELIVERABILITY OF LAND EAST OF WATERMILL LANE (NORTH)	6
2.1	OVERVIEW	6
2.2	SITE LOCATION AND DESCRIPTION	6
2.3	ACCESS	7
2.4	POLICY DESIGNATIONS AND SITE-SPECIFIC CONSIDERATIONS	7
2.5	AVAILABILITY AND ACHIEVABILITY	9
3	RESPONSE TO CONSULTATION	11
3.1	OVERVIEW	11
3.2	RESPONSE TO QUESTIONS	11
	Q1 - Do you have any comments on the amended Rother Local Plan Strategic Spatial Objectives shown in Figure 1?.....	11
	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?	11
	Q7 - Do you have any comments on the preferred approach for housing density shown in Figure 9, or on the updated Density Study (2026)?	13
	Q8 - Do you have any comments on the Council’s proposed Overall Development Strategy?	14
	Q9 - Do you have any comments on the proposed growth opportunities in the sub-areas as shown in Figure 10?	15
	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?	15
	Q17 - Do you have any comments on the proposed site allocations in Bexhill?.....	15
	Q18 - Do you consider that there are any other possible sites in Bexhill which should be allocated for development in the Local Plan?.....	18
	Q24 - Do you have any comments on proposed Policy BX29: North Bexhill Growth Area – Infrastructure Policy?.....	23
	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)?.....	25
4	CONCLUSION	28
	APPENDIX 1 – Illustrative Site Layout and Vision Plan	
	APPENDIX 2 – Transport Technical Note	
	APPENDIX 3 – Landscape and Visual Appraisal	
	APPENDIX 4 – Heritage Note	
	APPENDIX 5 - School Catchment Drawing	
	APPENDIX 6 – Education Technical Note	

1 INTRODUCTION

1.1 OVERVIEW

- 1.1.1 This representation has been prepared on behalf of Catesby Strategic Land Limited (hereafter referred to as 'Catesby Estates') and Rurban Estates Limited in response to Rother District Council's Regulation 18 consultation on the Draft Local Plan 2025-2042, which runs until 23rd March 2026.
- 1.1.2 Rother District Council ('RDC' or 'the Council') 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.
- 1.1.3 The consultation follows a previous Regulation 18 consultation on the draft Local Plan which took place in April 2024. The consultation sought views on the proposed development strategy, vision and objectives, along with policies on specific topic areas such as housing, economy, the environment, landscape, heritage, design and infrastructure. 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.
- 1.1.4 This representation does not repeat the comments made on policies or chapters included within the first consultation and we refer Policy Officers to report reference July 2024 - DHA/33941.
- 1.1.5 The purpose of this representation is to support the strategic growth identified for North Bexhill and the inclusion of 'Land north of Haven Brook Avenue (east), Bexhill' under draft Policy BX36. It seeks to comment on the scope of the draft policy and on the proposed spatial strategy more generally.
- 1.1.6 Draft Policy BX36 is formed of two land parcels promoted through the Council's Strategic Housing and Economic Land Availability Assessment (HELAA), comprising BEX0164 (Land east of Watermill Lane (north)) and BEX0163 (Land north of A2691 NBAR (east)). Catesby Estates Limited has control of part of Site Reference BEX0164 which has been promoted by the landowner, Rurban Estates Limited.
- 1.1.7 In light of RDC's significant housing need, and in recognition of the proposed further expansion of North Bexhill, land north of Haven Brook Avenue (east) is well placed to deliver a cohesive and landscape-led residential development opportunity which integrates open space and biodiversity enhancements whilst making a valuable contribution to the delivery of up to 230 high-quality new homes, with the necessary infrastructure improvements to support it. The development of this site will be consistent with the Council's preferred spatial options and the ongoing development around Haven Brook Avenue.
- 1.1.8 This representation affirms our client's commitment to developing the site and provides additional evidence to demonstrate that the site is suitable for allocation.

1.2 PLANNING POLICY FRAMEWORK

- 1.2.1 **Paragraph 15** states that the planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings.

- 1.2.2 **Paragraph 16** sets out that plans should: -
- (a) be prepared with the objective of contributing to the achievement of sustainable development;
 - (b) be prepared positively in a way that is aspirational but deliverable;
 - (c) be shaped by early, proportionate, and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
 - (d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
 - (e) be accessible through the use of digital tools to assist public involvement and policy presentation; and
 - (f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in the NPPF where relevant).
- 1.2.3 **Paragraph 26** states that effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy.
- 1.2.4 In line with **Paragraph 36** for Plans to be found 'sound' final draft plans must be:

Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

Effective – deliverable over the Plan Period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

1.3 STRUCTURE OF THE REPRESENTATION

- 1.3.1 **Section 1** of this report is an introduction to the plan context.
- 1.3.2 **Section 2** of this report introduces the site and its surrounding and explains why we consider it is a suitable location for planned growth, with reference to additional evidence available from the emerging applications.
- 1.3.3 **Section 3** responds to the draft consultation questions.
- 1.3.4 **Section 4** concludes the report and sets out why the site should be allocated within the draft local plan.

1.4 SUPPORTING DOCUMENTS

1.4.1 This Representation should be read in conjunction with the following submitted documents:

- 697_SK01-Indicative Site Layout a (EDGE) (**Appendix 1**)
- 697_SK02-Vision Plan (EDGE) (**Appendix 1**)
- Transport Technical Note (**Appendix 2**)
- Landscape and Visual Appraisal (**Appendix 3**)
- Heritage Note (**Appendix 4**)
- School Catchment Drawing (EDGE) (**Appendix 5**)
- Education Technical Note (**Appendix 6**)

2 DELIVERABILITY OF LAND EAST OF WATERMILL LANE (NORTH)

2.1 OVERVIEW

2.1.1 This section seeks to demonstrate that proposed site allocation BX36 is deliverable within the emerging plan period. This section focuses specifically on the deliverability of BEX0164 which is controlled by Catesby Estates. It is noted that BEX0163 has been promoted through the Call for Sites by a strategic land promoter and therefore we understand it to also be available for development in the emerging plan period.

2.1.2 It should be read alongside the Indicative Site Layout and Vision Plan contained in **Appendix 1**.

2.2 SITE LOCATION AND DESCRIPTION

2.2.1 The proposed site allocation comprises a 6.6-hectare area of land to the east of Watermill Lane, Bexhill, as outlined in red in **Figure 2.1** below. The allocation has been identified following a Call for Sites exercise and assessed under Site Reference BEX0164 (Land east of Watermill Lane (north)) – forming the northern portion of the allocation – and BEX0163 (Land north of A2691 NBAR (east)) – forming the southern part of the allocation – in the HELAA.

2.2.2 BEX0164 is characterised by two parcels of agricultural pastureland, separated in part by a strip of hedgerow and trees approximately two thirds across the site. It is bounded to the north by Cockerel's Wood, to the west by Cole Wood, to the south by Site Reference BEX0163 and to the east by the recently constructed roundabout forming the central section of the Haven Brook Avenue bypass.



FIGURE 2.1: SITE AERIAL SHOWING SURROUNDING CONTEXT (BASE MAP SOURCE: GOOGLE)

- 2.2.3 Beyond Haven Brook Avenue to the south are strategic site allocations BX31, BX32, BX33, BX34 and BX35. BX37 lies to the north side of Haven Brook Avenue at its western end. Some of these sites are retained from the adopted Local Plan and benefit from a resolution to grant outline planning consent (BX31, BX32 and BX33). The landscape character around Haven Brook Avenue is therefore subject to considerable change over the coming years, with BX36 acting as a natural edge the settlement, by virtue of the strongly wooded boundaries which enclose North Bexhill from the wider rural landscape.

2.3 ACCESS

- 2.3.1 The site is currently accessed via a farm gate off Watermill Lane.
- 2.3.2 These representations are supported by a Transport Technical Note prepared by DHA. The Technical Note confirms that vehicular access can be achieved by way of a new priority junction off Watermill Lane, which can achieve adequate visibility splays. This access would be designed to connect just north of the roundabout on Haven Brook Avenue south west of the site, which has now been completed to facilitate growth.
- 2.3.3 The site is positioned to benefit from excellent new local transport infrastructure including Haven Brook Avenue which features a new shared footway/ cycle way including a new crossing point within the site's immediate vicinity.
- 2.3.4 A review of the existing local pedestrian, cycle and public transport infrastructure has demonstrated that the site is afforded the opportunity for many everyday journeys to take place by active and sustainable travel modes, with a range of local services and facilities located within a reasonable walking and cycling distance in Sidley and Bexhill-on-Sea. There are also opportunities to enhance this infrastructure as part of the implementation of the proposed development.
- 2.3.5 There is an existing public footpath (reference BEX/35/1) running within the northern boundary of the site, which can be accessed via Watermill Lane on its north-western boundary. This footpath can be sensitively designed into a future development, with only a small diversion required to improve the efficiency of the site for development, as shown in **Appendix 1**.

2.4 POLICY DESIGNATIONS AND SITE-SPECIFIC CONSIDERATIONS

Heritage

- 2.4.1 There is one designated heritage asset within the vicinity of the site, comprising the Grade II listed Cockerels Farmhouse (Listing Entry Number 1190249) located outside the western boundary.
- 2.4.2 As set out within the Heritage Note prepared by Pegasus Group, the residential development of the site and provision of the access could be delivered with only less than substantial harm at the lower end of the spectrum to Cockerell's Farmhouse and, as such, matters relating to built heritage are not considered to represent a constraint to the deliverability of the site.
- 2.4.3 The emerging masterplan has responded sensitively to the setting of the Listed building, with a set back of built form in the western area of the site, and the intervening space used as open space. This will perpetuate the agricultural character of the immediate setting of the asset.

- 2.4.4 The site does not fall within a Conservation Area, with the nearest being the Bexhill Old Town Conservation Area located approximately 2.2km to the south.
- 2.4.5 The site does not fall within an Archaeological Notification Area (ANA) as defined by the East Sussex County Council map for ANAs in East Sussex and Brighton & Hove.

Flood Risk/Drainage

- 2.4.6 The Environment Agency's Flood Map for Planning shows the site within Flood Zone 1, which means that the site is at low risk of flooding from nearby rivers and the sea. There are very limited areas at risk of surface water flooding in the 1 in 1000-year scenario, as shown in **Figure 2.2**. This risk follows a field drain following the line of trees and hedgerows in the centre of the site.
- 2.4.7 Any future application will include a Flood Risk Assessment and Drainage Strategy. The proposed surface water drainage strategy will ensure that all runoff from the development is managed safely and in accordance with the requirements of the Environment Agency (EA) and Lead Local Flood Authority. Runoff rates will be limited to the 1-in-1-year greenfield runoff rate for each development parcel, ensuring there is no increase in downstream flood risk.

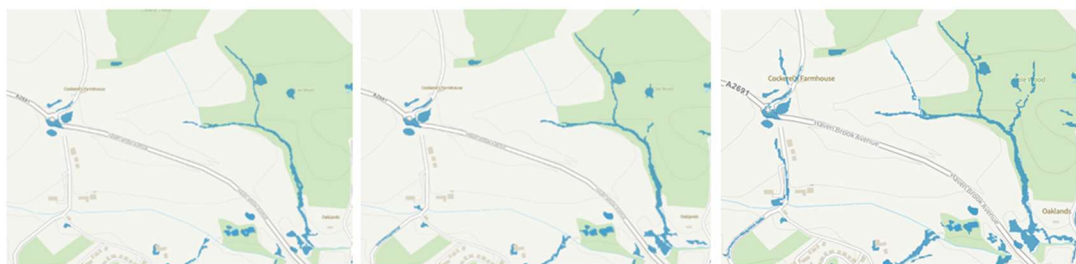


FIGURE 2.2: EXTRACT OF THE DEFRA FLOOD MAP FOR PLANNING (SOURCE: DEFRA)

Environmental and Spatial Designations

Landscape

- 2.4.8 The site is not within the South Downs National Park, or its setting, nor is it covered by the High Weald National Landscape or Green Belt.
- 2.4.9 The site located on the northern edge of Bexhill, in an area characterised by both rural landscape and clusters of built development including the Cobbs Hill Campsite and clusters of residential development. The key landscape features within the site are found along the boundaries in the form of trees and hedgerows. The majority of the site is characterised by open grassland.
- 2.4.10 Although the proposals will alter the character of the site itself through the loss of green fields, it is considered that the proposed development will not be out of scale or context with the nature of the landscape within which is proposed to be located; within an area which is relatively well-contained and subject to influences from neighbouring development.
- 2.4.11 A Landscape and Visual Assessment (LVA) (**Appendix 3**) has been undertaken by LDA Design to evaluate potential landscape and visual effects arising from the future development. The assessment identifies opportunities to mitigate and avoid adverse impacts, while also exploring potential for local landscape enhancements.

- 2.4.12 The appraisal states that a sensitively designed scheme for approximately 130 dwellings and supporting uses would (assuming the design recommendation are broadly adhered to) relate well to the existing settlement pattern; would be well integrated into the landscape and existing built up area of Bexhill through careful consideration of site layout, building heights and green infrastructure; and would not become a prominent feature in views.

Ecology and Trees

- 2.4.13 Cockerel Wood and Cole Wood beyond the northern and eastern boundaries are defined as Ancient, as shown in **Figure 2.3** below. The submitted Illustrative Masterplan demonstrates how a development can be sensitively designed to accommodate the requisite 15m buffer zone around these areas, in line with Natural England's Standing Advice.
- 2.4.14 There are no Tree Preservation Orders (TPOs) covering trees along the perimeter of the site, according to RDC's TPO map.
- 2.4.15 There are no ecological constraints which would prevent the site from being developed. The development would achieve Biodiversity Net Gain through on-site enhancements as a priority, with offsite enhanced used for any residual loss and gains.

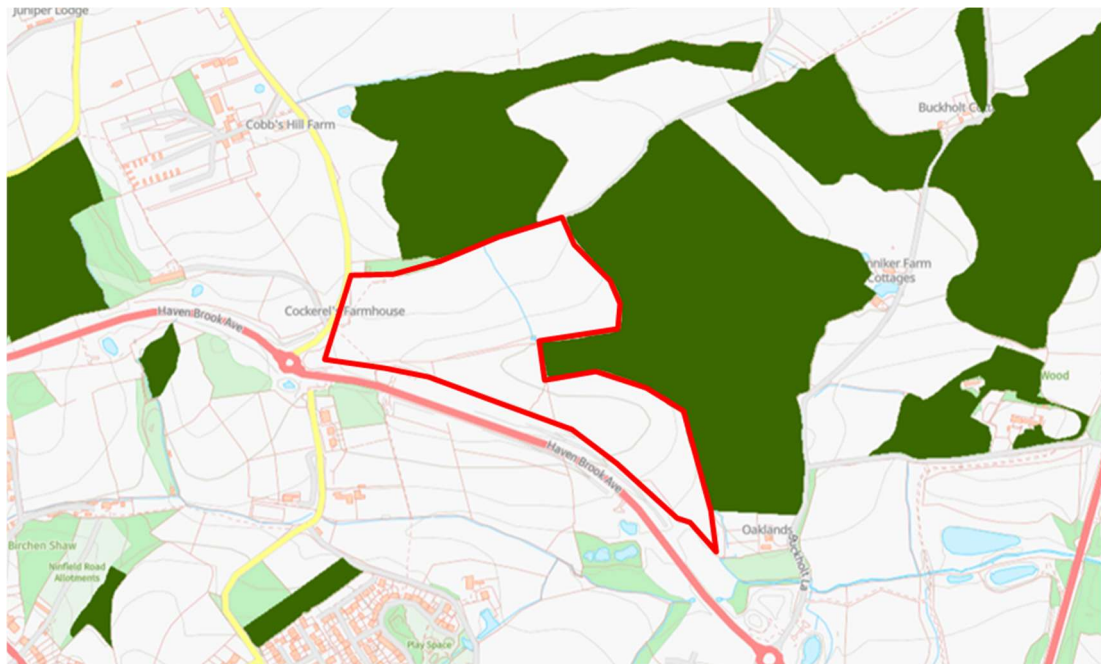


FIGURE 2.3 - LOCATION OF THE ANCIENT WOODLAND OUTSIDE THE NORTHERN AND EASTERN BOUNDARY
(SOURCE: MAGIC MAPS)

2.5 AVAILABILITY AND ACHIEVABILITY

- 2.5.1 For the reasons set out in this section, the site is considered suitable for a residential-led development, given its location within the strategic growth area of North Bexhill.
- 2.5.2 To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. The site has no planning history of relevance or a history of unimplemented permissions that would alter the conclusions that it is a deliverable site. There are not considered to be any impediments to the site being phased for potential development commencing within the 0 - 5 year period. There are no physical

limitations or problems such as access, infrastructure, flood risk, hazardous risks, pollution or contamination.

- 2.5.3 Availability is essentially about confirming that a site has been made available for development by the landowners, and that it is financially viable to develop. On behalf of the landowner, we can confirm that there are no unexpected financial restrictions that would impact upon the viability of a housing scheme based on current policy, or that would prohibit development coming through within the early stages of the plan period. To the contrary, we consider there to be opportunity to deliver a high-quality residential development.
- 2.5.4 The site is controlled by our client, a strategic land promoter, and is in single ownership. The wider allocation area is also controlled by a strategic land promoter, Gladman. Both Catesby and Gladman have significant experience in delivering sites where collaboration may be required.
- 2.5.5 There are no complicated legal agreements or covenants that would prohibit the ability to bring forward the site early in the plan period.

3 RESPONSE TO CONSULTATION

3.1 OVERVIEW

3.1.1 This section provides a response to the consultation questions contained within the Consultation Document where they are of relevance to our client's interests.

3.2 RESPONSE TO QUESTIONS

Q1 - Do you have any comments on the amended Rother Local Plan Strategic Spatial Objectives shown in Figure 1?

3.2.1 Please refer to our comments made on the Strategic Spatial Objectives contained within our representation on the 2024 consultation. We have no specific comments to make on the amendments made.

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?

3.2.2 The Council's housing supply components are consolidated in the table below. It is noted that the categories of supply have been revised since the 2024 consultation which make it clearer how sources of supply have been factored into the overall calculations. It is also noted that the number of homes identified as new and updated draft allocations has increased considerably since the April 2024 consultation, rising from 2,129 homes to 5,051 new homes. 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 a target of 495 homes annually.

SOURCE OF HOUSING SUPPLY	2026
Completions	To be included from 1 st April 2026
Committed Sites – Planning permissions (including resolutions to grant), permitted site allocations, permitted large windfall (non-allocated sites for 5 + dwellings), prior approval for 5 + dwellings, existing site allocations without planning consent	2,830
Windfall Sites - Small site allowance of 39 units annually, starting Year 4 of plan period	546
New / Updated Allocations – Existing site allocations without planning consent with revised capacity (residual figure), new site allocations without planning consent (as of 1 st April 2025).	5,051
Unmet need accommodated outside of Rother	0

3.2.3 This is recognised to be a considerable increase in potential housing supply when compared to the adopted Core Strategy figure (355 homes per year), which our client welcomes. 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.

- 3.2.4 In this regard, the Hastings & Rother Housing and Economic Development Needs Assessment (February 2024) identifies close ties with the neighbouring authorities of Wealden, Tunbridge Wells, Eastbourne and in particular, Hastings which is on the basis of comparatively strong links. They are concluded to form a self-contained housing and functional economic market area with Rother. All four neighbouring authorities are subject to significant constraints and have historically underdelivered on housing.
- 3.2.5 Notably, Hastings Borough Council is currently undertaking consultation on a new Local Plan Preferred Options Regulation 18 consultation which closes in April 2026. This consultation, following the undertaking of housing land availability evidence, indicates a new housing target of 3,141 to 3,373 homes for the Plan period based on land availability. By comparison, the standard method target equates to 12,546 homes.
- 3.2.6 Elsewhere, both the Eastbourne and Wealden Local Plans to 2042 are undergoing simultaneous Regulation 18 consultations within which the challenges associated with sustainably delivering 14,280 and 16,609 homes respectively are stated from the outset.
- 3.2.7 The Eastbourne Regulation 18 Plan proposes just 301 homes per year, compared to a target of 714 homes (approximately 42% of the standard method target), whilst the Wealden Regulation 18 Plan states that the Council does not currently consider that they can meet all of their development needs due to a lack of deliverable sites in sustainable locations.
- 3.2.8 In addition, the recently adopted Tunbridge Wells Local Plan 2038 fails to deliver its housing need in full, containing land only sufficient for the first 10 years of the Plan and is subject to an immediate review to identify housing for the remainder of the Plan period.
- 3.2.9 On account of the deeply concerning regional context, within which all four neighbouring authorities are struggling to meet even half of their housing requirement, it is vital that RDC explores whether it can accommodate the unmet need of neighbouring authorities and in particular Hastings, to which Rother shares its housing and functional economic market area, in addition to meeting its own needs.
- 3.2.10 However, 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 add a further 775 homes to the shortfall.
- 3.2.11 The Framework is clear that in order to be found sound, Plans should be 'positively prepared'. This means providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs and wherever possible, the unmet need from neighbouring areas.
- 3.2.12 The constraints within the District are fully acknowledged, however they are not unique to Rother and comprises principally the designation of much of the local authority area (83%) within the High Weald National Landscape. As the Council will be aware, whilst this invariably place additional expectations on new and particularly major developments, it is not prohibitive. The NPPF makes provision for major development (which itself is subjective and not necessarily development of more than 10 dwellings in accordance with the Town & Country Planning Act definition) in exceptional circumstances and where development is in the public interest. In this the context, the scale of the housing need and by the Council's own admission, the limited capacity of the non-National Landscape areas

to accommodate the development needs, it is considered likely that exceptional circumstances exist to justify major development proposals within the National Landscape.

- 3.2.13 Such is the projected shortfall in the District, alongside the simultaneous shortfalls within the neighbouring authorities of Hastings, Wealden, Eastbourne and Tunbridge Wells, there is the potential for the major under-delivery of circa 50% in the housing market area for the foreseeable time horizons of the emerging Local Plans (circa fifteen years).
- 3.2.1 It cannot be underestimated the potential soundness risks that submitting the Plan with such a significant shortfall would present and we would cite the recent examination in Wiltshire, Horsham and Oxford in the last 24 months as examples of the challenges associated with submitting a Plan to examination that proposes to significantly under deliver against the standard method local housing need. Indeed, despite the Written Ministerial Statement (WMS) of 27 November 2025 effectively abolishing the Duty to Co-operate, Mid Sussex District Council has been pressed by the Inspector overseeing the Examination in Public to identify a significant number of additional sites to cater for unmet needs largely arising from Crawley and Brighton & Hove, on the basis that the WMS confirms that LPAs should *"continue to collaborate across their boundaries, including on unmet development needs from neighbouring areas,"*
- 3.2.2 Even should the Plan be found sound and successfully adopted, under the current Framework, Rother would be subject to a 20% buffer (effective six year supply) by virtue of paragraph 78(c) of the Framework, which is required for Plans whose annual average housing requirement is 80% or less of the most up to date local housing need figure using the standard method. At the time of writing, the Plan proposes just 54% of the standard method figure and in all likelihood would be subject to a 20% buffer on adoption.
- 3.2.3 At this stage of the process, the housing trajectory has not yet been published, however given historic supply and delivery in the District, it is in our view unlikely that the maintenance of a six year supply would be achievable and RDC's subsequent capability to resist speculative development, including in the National Landscape which the Council are rightly seeking to protect, would be severely diminished.
- 3.2.4 On account of all of the above, we strongly support our client's allocation, which must form a valuable component of RDC's deliverable supply. However, in the interests of ensuring a sound Plan, we strongly suggest that all draft allocation sites are appropriately considered and in addition, further suitable sites are sourced as part of the relaunched and ongoing 'Call for Sites' exercise to ensure the submission of a sound Plan.

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

- 3.2.5 The NPPF states that *"where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site"* (emphasis added). While there should be greater emphasis on efficient use of land in the district, this must not compromise the need to deliver context-appropriate development or development that responds to local market demands.
- 3.2.6 The proposed density range of 45-60 dwellings per hectare for the Live Well Locally area (Urban Edge of Bexhill) set out in the 2024 consultation does not align with the findings of the Density Study (2026) which recommends a density of 35-55 dwellings per hectare. The Density Study includes a number of case studies within the Live Well Locally urban edge which show how this density range can be delivered through coherent neighbourhood structure (perimeter and mews blocks), rebalanced amenity (shorter private gardens paired with shared greens/courts), and parking that is distributed and designed rather than dominant. It is stated that heights should be used as a tool rather than a blanket approach:

2 storeys predominant in the most sensitive contexts; 2–3 storeys generally at Bexhill edge; and 3–4 storeys reserved for hubs/key streets where supported and stepped down toward edges.

- 3.2.7 Since the 2024 consultation, RDC has further examined whether these density expectations are appropriate, having regard to the need to optimise the use of land and maximise housing delivery. Within this context, the 2026 consultation presents three options (Options A-C) for housing density, framed as:
- a) Option A - 'Business as Usual' - reflects density levels based on the adopted Development and Site Allocation Local Plan.
 - b) Option B - 'Higher Density' - higher density with a significant uplift in development density (compared to the baseline). Live Well Locally areas are given a density of 40dph, comprising 'low-rise development at the mid-range of medium density, located on the urban edge.'
 - c) Option C - 'Higher Density Plus' - higher density with a significant uplift in development density (compared to the baseline). Live Well Locally areas are given a density of 50dph, comprising 'low-rise development at the higher range of medium density, located on the urban edge.'
- 3.2.8 RDC's preferred approach is Option B, with the recommended target density range of 35-55 dph for Live Well Locally areas.
- 3.2.9 Whilst we fully support the efficient use of land and, higher densities where appropriate, the policy wording should not be overly prescriptive to ensure that individual site characteristics are appropriately considered. It is recognised that there will be opportunities within the Growth Area where higher densities will be appropriate but equally it can be necessary to incorporate lower densities at settlement edges to provide a sensitive transition to the open countryside beyond. Further, a prescriptive density to all sites doesn't necessarily provide an appropriate range of homes to meet market demand, including family sized properties.

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

- 3.2.10 Our client is supportive in principle of the overall development strategy, however for the reasons set out in relation to Question 2, we have residual concerns that it is not a sufficiently ambitious strategy that will be effective in delivering a positively prepared plan.
- 3.2.11 We do question the validity of the Interim Sustainability Appraisal Report (January 2026) which scores the proposed development strategy the highest score '++' against objective 8 for the delivery of homes. This appears generous given the proposed strategy would deliver just 52% of the housing need.
- 3.2.12 By way of remedy and to ensure the safe passage of the Plan through examination, we would strongly suggest that the development strategy is revisited to further emphasise the intensification of existing urban opportunities and expand the scope for development within the National Landscapes which is inevitably going to be required if RDC are to more closely align with the standard method local housing need. Further the Council should revisit its site assessments, and sites that have been rejected, to consider whether these conclusions are too conservative and appropriate mitigation can be provided.

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

- 3.2.13 Notwithstanding our comments on housing need, we are supportive of the overall strategy of allocating the largest proportion of homes to Bexhill. This is appropriate to the settlement's function as the district's largest settlement and as a regionally important town which benefits from a wide range of services including retail, employment, medical and educational services and three train stations providing connections to Hastings, Eastbourne and Ashford International.
- 3.2.14 The level of growth is also supported by the delivery of the Bexhill to Hastings Link Road which has significantly improved connectivity within the district and wider south east region by redirecting vehicular traffic out of the town centre.

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?

- 3.2.15 We support the general aims of the Vision and development strategy for Bexhill.

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

- 3.2.16 We strongly support the inclusion of Policy BX36 in the emerging Local Plan given its alignment with the planned strategic growth in North Bexhill, the availability of the land for development, and its suitability for a landscape-led mixed-use development that forms an appropriate and logical extension to Bexhill.
- 3.2.17 However, it should be noted that the draft allocation boundary excludes a small area of land in the northern corner which falls within the same ownership. While this part of the site is in part vegetated, it is relevant to our response to Question 18 and can form a suitable part of the landscaping and access strategy for the development.



- 3.2.18 The draft policy envisages a residential-led mixed use development of up to 230 dwellings on both BEX0164 (Land east of Watermill Lane (north)) and BEX0163 (Land north of A2691 NBAR (east)). The indicative proposal for BEX0164 sets a target density of 35dph, which falls within the proposed density strategy for Live Locally Areas and reflects the site's edge of settlement location. The quantum of development that can be secured on this part of the allocation is some 130 homes set within a strong and mature landscape framework.
- 3.2.19 A well-connected network of routes for pedestrians, cyclists and vehicles will link the site to the existing network of footpaths and streets, to create a highly legible and accessible extension to the neighbourhood. Routes will be designed to promote walking and cycling above the car, with connections to public transport encouraging healthy lifestyles and

sustainable travel. All homes will be within easy reach of a variety of open spaces on their doorstep.

- 3.2.20 Landscape corridors through the site will accommodate new planting and drainage as a defining natural feature supporting the existing habitats as well as protecting views from within and outside of the site.
- 3.2.21 A primary street meanders through the site to provide access to new homes as part of a network of safe and pedestrian friendly streets and routes. Areas for play and recreation are incorporated within the landscape, with a variety of leisure routes connecting homes to the play space and landscaped areas.
- 3.2.22 The proposals would deliver a variety of new homes in a range of sizes and tenures with a character that respects the local vernacular. The density proposed varies across the site, respecting the topography and settlement pattern. A range of homes would be delivered with a balance of tenures and sizes in accordance with local policy to meet local needs.
- 3.2.23 Our client is generally supportive of the outlined objectives for the sites contained within the Draft Policy BX36, but makes specific comments on elements of the policy in the table below.

POLICY BX36 CRITERIA	RESPONSE
<i>i. Provide a policy-compliant amount of on-site affordable housing in line with policy HOU2 of the Rother Local Plan;</i>	No comment. Please refer to our comments made on the proposed affordable housing policy in the 2024 representation.
<i>ii. Accord with Policy BX29 of this Plan (North 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 North Bexhill area;</i>	No comment. Please refer to our commentary on Policy BX29.
<i>iii. Be informed by a landscape sensitivity assessment to determine an appropriate layout, form and detailed design;</i>	Support. As an edge of settlement site, it is important that future development takes a landscape led approach to design, layout, form and density, whilst also noting RDC's and the Government to maximise densities where appropriate. Please refer to our separate comments on the Density Study.
<i>iv. Include vehicular access from Haven Brook Avenue or Watermill Lane to include necessary improvements and infrastructure to meet the requirements of East Sussex Council;</i>	<p>Given the strong natural boundaries to the south of parcel reference BEX0164, the topography of the land immediately south, and the scale / form of the wider allocation, it is likely that two separate vehicular entrances will be required. As such we request that this policy is amended to state:</p> <p><i>Include vehicular access from Haven Brook Avenue and/or Watermill Lane to include necessary improvements and infrastructure to meet the requirements of East Sussex Council..</i></p> <p>Access into parcel reference BEX0164 can be achieved via the roundabout that has been completed to the west of the site. It is expected that access would be located just north of the</p>

POLICY BX36 CRITERIA	RESPONSE
	<p>roundabout on the southern end of Watermill Lane. This would aid in protecting the setting of Cockerels Farmhouse located to the north and avoid unnecessary works to the highway further north.</p> <p>It is expected that pedestrian and cycle link would be provide through the southern boundary of BEX0164 to facilitate active travel links into the adjacent site and across Haven Brook Avenue.</p>
<p><i>v. Provide new and improved pedestrian and cycle infrastructure outside the site to link the site to the existing path on the southern side of Haven Brook Avenue, which could include a new footway on the northern side of Haven Brook Avenue and the western side of Watermill Lane, and additional crossing points</i></p>	<p>We support the principle of this policy requirement in order to improve the accessibility of the site and encourage active travel where possible.</p>
<p><i>vi. Maintain the existing public right of way within the site;</i></p>	<p>Support. The existing footpath (BEX/35/1) can be designed into the site layout.</p>
<p><i>vii. 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 northern and eastern boundaries of the site, between the edge of development and the ancient woodland;</i></p>	<p>Support. The indicative site layout that has been prepared for BEX0164 includes a green buffer around the perimeter of the site to soften the appearance of the development and to accommodate the requisite buffers. This policy must continue to be aligned with Natural England's Standing Advice of 15m.</p>
<p><i>viii. Retain and enhance the existing hedgerows, trees and woodland within the site and on the site boundaries, except for any short sections of hedgerow that have to be removed to facilitate access, which should be minimised as far as possible;</i></p>	<p>Support.</p>
<p><i>ix. Protect the setting of the Grade II Listed Building, Cockerels Farmhouse, to the west of the site;</i></p>	<p>Cockerels Farmhouse benefits from strong natural boundaries which help to visually contain the asset from the wider landscape. The development land beyond the asset's immediate curtilage would inevitably change from rural to developed, therefore there is likely to be some unavoidable impact on the asset's historic setting. For this reason we request the following revision:</p> <p><i><u>Minimise the harm to the setting of the Grade II Listed Building, Cockerels Farmhouse, to the west of the site through sensitive design, landscaping and layout.</u></i></p> <p>This impact would be assessed as part of any future application for the site and the impact weighed against the public benefits of providing new homes in a location with considerable and demonstrable need.</p>

POLICY BX36 CRITERIA	RESPONSE
<i>x. Include an assessment and evaluation of the site's archaeological potential and the implementation of any appropriate mitigation measures identified through the assessment;</i>	No objection. The site does not fall within an ANA, however an archaeological assessment would form part of any future planning application to assess the potential for underground remains.
<i>xi. Avoid built development in those areas of the site shown to be at risk of surface water flooding;</i>	Given the location and extent of the limited surface water flood risk within the site, and in the wider allocation, it is likely that the homes can be positioned away from these areas of risk.
<i>xii. Provide a connection to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider</i>	No comment.

3.2.24 Please also note our comments on Question 18. Additional land is available to the north which could be included in BX36 for the delivery of a new Primary School with Early Years Nursery provision.

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

3.2.25 This representation is accompanied by an Education Technical Note contained at **Appendix 6**, which has been prepared to understand the need for school places in the North Bexhill Growth Area, with reference to Draft Policy BX29 (North Bexhill Growth Area – Infrastructure Policy) which identifies a requirement for a new Primary School with Early Years Nursery provision.

3.2.26 The stated aim of Policy BX29 is to provide a school for which the majority of pupils within the North Bexhill Growth area would be within walking distance. Concerns have been raised in our client's representation on Draft Policy BX39 that one of the options for the school – land west of Ninfield Road – would not be appropriate as a school site, given its position on the western side of the Growth Area.

3.2.27 The alternative school site option (BX37) is considered to be more appropriately located relative to the Growth Area and direct access onto the local road network. However, noting that this would be reliant on third party land, we wish to put forward an alternative school site for consideration.

3.2.28 The site lies immediately north of BX36 and could be brought forward as a standalone development to meet future demand, whilst benefiting from the internal road and pedestrian infrastructure expected to be delivered as part of BX36. This aligns with the conclusions of the enclosed Education Technical Note which identifies an existing and emerging surplus of school places that would accommodate the demand of around 1,000 homes in the early plan period. The new school is therefore not immediate, and will be dependent on delivery timescales alongside the availability of developer contributions and potential funding from the Department for Education (DfE).

3.2.29 The promoted site extends to approximately 2.2 hectares and is currently formed of agricultural pastureland, bounded to the south by draft allocation BX36, to the east by Cockerel's Wood, and to the north and west by linear hedgerows. Beyond the hedgerow to the west is Watermill Lane, with agricultural fields and the Cobbs Hill Farm caravan and camping park beyond.

- 3.2.30 The topography of the site lopes gently upwards from BX36 to the south towards its highest point in the centre. This provides an opportunity for built form in the southern part of the site which would be visually contained with the Growth Area, leaving the northern part of the site undeveloped and set aside for the open playing fields and sports pitches.
- 3.2.31 It is envisaged that the site could be accessed from a single point of entry from the southern end of Watermill Lane which benefits from a recently constructed roundabout on Haven Brook Avenue. Access is likely to be taken through the southwest boundary of BX36, diverting northwards and through the southern boundary, meaning that Watermill Lane itself would not need to be widened. This would allow the school to be delivered before or after the residential parcels within the adjacent allocation, depending on when the need arose. Parking and drop off could be accommodated entirely with the site's boundary, although there would be opportunities for temporary parking within BX36 for the school's benefit and for visitors associated with the nearby residential dwellings.
- 3.2.32 It is both available and deliverable within the plan period, with no known viability issues, legal or third-party constraints present.



- 3.2.33 To aid with review, the site is assessed against the Stage 1 and Stage 2 assessment criteria contained within the HELAA and Site Selection Methodology Background Paper (2025) below.

STAGE 1 ASSESSMENT CRITERIA	RESPONSE
BIODIVERSITY, HABITAT AND LANDSCAPE CONSTRAINTS	
<i>Ancient Woodland</i>	Adjacent to the east. The requisite buffer of 15m can be accommodated within the site and suitable boundary treatments can be used to prevent access into the buffer and wooded area. These boundaries would already be required for security reasons. The remaining developable area is sufficient in size to meet DfE requirements for

STAGE 1 ASSESSMENT CRITERIA	RESPONSE
	schools. As per RDC's assessment approach the presence of adjacent Ancient Woodland would not rule out the potential allocation of the site. Any future application will follow Natural England's Standing Advice.
High Weald National Landscape	The site falls outside of the boundary and setting of the High Weald National Landscape (3.5km to the north).
Biodiversity Opportunity Area	The site is not known to fall into a Biodiversity Opportunity Area.
Local Wildlife Site	The site does not form part of a Local Wildlife Site.
Local or National Nature Reserve	The site does not form part of a local or national nature reserve.
Priority Habitat Inventory	None. The woodland outside the eastern boundary is Priority Habitat Inventory - Deciduous Woodland.
Ramsar Site	The site is not within or in close proximity to a RAMSAR site.
Site of Special Scientific Interest (SSSI)	The site is not within or in close proximity to an SSSI. The nearest SSSIs are High Woods (2.1km west) and Combe Haven (1.7km east).
Special Area of Conservation	The site is not within or in close proximity to an SAC.
Special Protection Area	The site is not within or in close proximity to an SPA.
SSSI Impact Risk Zone (relevant use)	The site is just within the impact risk zone of the two nearest SSSIs.
Tree Preservation Order (TPO)	RDC's TPO map does not show any trees with a TPO along the boundaries of the site. There are no trees within the site.
WATER CONSTRAINTS	
Flood Zone 2/3	Not applicable. DEFRA's flood map for planning confirms that the site is in Flood Zone 1, both in the present day and in the climate change scenario (2070-2125).
Surface Water Flooding Risk	The majority of the site has no identified risk of surface water. There is very limited flood risk around an existing pond in the north eastern corner which can be suitably designed into a future development.
Groundwater Flood Risk	There are no known risks of ground water flooding identified in the Rother District Level 1 Strategic Flood Risk Assessment (2021).
Groundwater Source Protection Zone	The site does not fall within a Groundwater Source Protection Zone (MAGIC maps – Source Protection Zone).
Pevensey Levels Hydrological Catchment	The site falls outside of this catchment.
Fairlight and Pett Drainage Area (as defined in the Development and Site Allocations Local Plan (Figure 11) and referred to in Policy DEN5)	The site falls outside of this drainage area.
HERITAGE CONSTRAINTS	
Archaeological Notification Area	The site is not within an Archaeological Notification Area.
Conservation Area	The site is not within a Conservation Area.
Historic Field Boundaries	A review of historic mapping indicates that the site's boundaries are as they existed in the late 1800s / early

STAGE 1 ASSESSMENT CRITERIA	RESPONSE
	1900s. These boundaries will not be affected by the development of the site.
Listed Buildings	Cockerels Farmhouse (Grade II listed; List Entry Number 1190249) lies approximately 85m beyond the southern boundary. Given the distance away from the site, intervening vegetation and the fact that the land to the south is presented as a draft allocation, this asset would not be an insurmountable constraint. A Heritage Assessment would form part of any future planning application.
Registered Battlefield	The site does not form part of, nor is it near to, a Registered Battlefield.
Registered Parks and Gardens	The site does not form part of, nor is it near to, a Registered Park and Garden.
Scheduled Ancient Monument	There are no Scheduled Ancient Monuments on or near to the site.
OTHER CONSTRAINTS	
Agricultural Land Use Classification	The site is Grade 3 (Good to Moderate) Agricultural Land. Many of the sites in the North Bexhill area comprise Grade 3 land.
Combe Valley Countryside Park	The site is not within the Combe Valley Countryside Park.
Waste or Minerals Consultation Area	The site does not fall within a Consultation Area.
Former Landfill	There is known no historic landfill on site.
Local Geological Site	The site does not fall within a known Local Geological Site.
Public Rights of Way	There are no rights of way within the site, meaning that the school could be appropriately bounded for safety and security purposes. There is a public footpath (BEX/35/1) within the adjacent allocation which would facilitate access to the site, alongside other infrastructure improvement works that have and will be delivered around Haven Brook Avenue.
Sustainable Access and Recreation Management Strategy (SARMS) area (as defined in the Development and Site Allocations Local Plan (Figure 10) and referred to in Policy DEN4)	Not applicable.
Strategic Gap (as defined in the Development and Site Allocations Local Plan (Figures 6 to 8) and referred to in Policy DEN3)	The site is not within a Strategic Gap.
Presence of services on site (electricity, gas, water)	There are low voltage overhead cables present but these are capable of being dropped in part and accommodated in the ground as part of any layout. There are no other known onsite services which would prevent the development of this site.
OTHER CONSIDERATIONS	
Site size, Boundaries and Location	The site is sufficient in size to accommodate a primary school and all requisite facilities. It is well positioned centrally within the emerging North Bexhill Growth Area to serve the educational needs of the new dwellings.

STAGE 1 ASSESSMENT CRITERIA	RESPONSE
<i>Current Land Use and Character / Land Uses and Character of the Surrounding Area, including Density of Existing Development</i>	<p>The site is currently rural in nature but in the periphery of an area that will be subject to a considerable change in character over the plan period. The existing character of the site is influenced by existing built form in the vicinity, including the dwellings, equestrian buildings and campsite facilities at Cobbs Hill Farm, located further north on Watermill Lane.</p> <p>The development of this site could also facilitate the development of Land west of Watermill Lane (north) (Site Reference BEX0165), subject to the identified constraints on access being overcome through detailed design work.</p>
<i>Whether development would be likely to impact on neighbouring amenities</i>	<p>The school would be separated from any nearby development by Watermill Lane and boundary vegetation / separation distances to the south.</p>
<i>Biodiversity potential, considering habitats present and potential for protected species</i>	<p>The site is currently an agricultural field which is expected to have low biodiversity value. The existing pond and adjacent hedgerows/trees would be assessed through an ecological appraisal and any necessary surveys / mitigation secured at application stage.</p>
<i>Drainage and watercourses</i>	<p>Any future application would be accompanied by a drainage strategy, demonstrating that all runoff from the development can be managed safely and in accordance with the requirements of the EA and Lead Local Flood Authority. Runoff rates would be limited to the 1-in-1-year greenfield runoff rate for each development parcel, ensuring there is no increase in downstream flood risk.</p>
<i>Any likely risks of contamination</i>	<p>The undeveloped nature of the site means that the risk of contamination is low. The site will be suitably assessed at application stage.</p>
<i>Any likely risks from land instability</i>	<p>There are no known risks of land instability. The site is gently sloped.</p>
<i>Presence of trees and hedgerows</i>	<p>The existing hedgerows and trees bounding the site can be largely retained, beyond any removals required for vehicular access through the southern boundary. The access design would be informed by tree and ecological surveys to reduce impacts as far as possible.</p>
<i>Any landscape issues</i>	<p>No further landscape issues to note.</p>
<i>Impact on the High Weald National Landscape</i>	<p>As previously noted, the site is not within or in the setting of the National Landscape.</p>
<i>Suitability of access (vehicular and pedestrian) and any traffic impacts</i>	<p>Access into the site can be provided as part of the delivery of Policy BX36 which falls within the same ownership. The school could be delivered prior to or following the allocated dwellings, depending on when the need for the school arose. Access would not be required through the housing area.</p>
<i>Physical constraints such as topography, existing buildings, powerlines, etc</i>	<p>There are no existing buildings or above ground utilities within the site. The site is gently undulating but not to any extent that would limit its development. As previously noted, the slope of the southern part of the site means that it would be visually enclosed with the North Bexhill Growth Area.</p>
<i>Proximity to, and level of, nearby services and infrastructure</i>	<p>The school development would be linked with the delivery of the North Bexhill Growth Area.</p>

STAGE 1 ASSESSMENT CRITERIA	RESPONSE
<i>Barriers to deliverability and how they may be overcome (for example, a ransom strip)</i>	There are no known barriers to delivery. The site is within the same ownership as the land to the south (Policy BX36).
<i>Any requirement for public open space if the site were to be developed</i>	Not applicable. The school would need to include external sports provision and amenity space as standard.
<i>Whether the site has potential for low carbon or renewable energy</i>	Yes, so far as it is relevant to a school development.
<i>Development progress (if relevant, if the site is being developed)</i>	Not relevant.
<i>Initial assessment of whether the site is suitable for a particular type of use or as part of a mixed-use development.</i>	For the reasons above, the site is considered to be suitable for the delivery a school in association with the North Bexhill Growth Area.

3.2.34 The above demonstrates that the site would pass the first stages of RDC’s site assessment process.

Q24 - Do you have any comments on proposed Policy BX29: North Bexhill Growth Area – Infrastructure Policy?

3.2.35 Policy BX29 is the general infrastructure policy for the proposed allocated sites in the North Bexhill Growth Area. It states that new development within the North Bexhill Growth Area will be coordinated through a master-planning approach. Proposals must appropriately contribute to the infrastructure required to create a sustainable, “Live Well Locally” community, to be provided in a timely manner, either by direct provision or through financial contributions attached to the respective planning permissions. This will include, but not be limited to the criteria assessed in the table below.

POLICY BX29 CRITERIA	RESPONSE
<i>i. Improvements to the strategic and local road networks (including any improvements to the wider road network in the Bexhill area) that are necessary to make the impacts of development acceptable, in accordance with the requirements of National Highways and the Highway Authority;</i>	No comment.
<i>ii. Improvements to pedestrian and cycling infrastructure, including new and improved safe and attractive routes to Sidley District Centre and Bexhill Town Centre;</i>	We support this policy requirement to facilitate non-car travel wherever possible.
<i>ii. Improvements to public transport including in terms of its provision and infrastructure, including financial contributions towards establishing a new bus service along Haven Brook Avenue;</i>	As above.

POLICY BX29 CRITERIA	RESPONSE
<p><i>iii. A new Primary School with Early Years Nursery provision, to serve the North-west Bexhill area, to be so located to enable the maximum proportion of planned new homes within the Growth Area to be within walking distance of it;</i></p>	<p>We accept that there will likely be a need for a new Primary School with Early Years Nursery provision to service the North Bexhill area.</p> <p>The land to the north of BX36 is considered an appropriate and deliverable candidate for the Primary School.</p>
<p><i>iv. 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);</i></p>	<p>No comment.</p>
<p><i>vi. Health and social infrastructure, as advised by the NHS and other bodies;</i></p>	<p>No comment. Any health and social infrastructure contributions must the NPPG tests which will need to be determined on a site-by-site basis.</p>
<p><i>vii. A comprehensive network of Green and Blue Infrastructure, including attractive and landscaped public open spaces with retained mature trees and ponds, play areas for all ages, and areas for biodiversity enhancements;</i></p>	<p>No comment.</p>
<p><i>viii. Outdoor sports facilities including formal playing pitches to meet the needs of new residents, with appropriate supporting infrastructure;</i></p>	<p>This policy should be revised to make specific reference to the quantum of sports provision required in the North Bexhill area to provide clarity for applicants, to aid with masterplanning and to inform discussions regarding proportionate monetary contributions for offsite provision (as required). Alternatively this policy should confirm that delivery should align with the provision identified in the site-specific policies. It is noted for example that BX31 (Kiteye Farm) sets a requirement for 2.64 hectares of open spaces, including outdoor sports provision.</p> <p>The physical characteristics of each site will determine whether it is possible for sports facilities to be accommodated.</p>
<p><i>ix. Indoor meeting places such as a community centre, café, public house, place of worship;</i></p>	<p>We have no objection to the inclusion of this requirement in the policy.</p>
<p><i>x. Sustainable Drainage Systems (SuDS) in accordance with Policy ENV2 to ensure appropriate drainage of new development and the protection of the Pevensy Levels SAC/ Ramsar site (the western part of the Growth Area lies within the Pevensy Levels Hydrological Catchment);</i></p>	<p>No comment.</p>
<p><i>xi. Any necessary improvements to wastewater treatment infrastructure to ensure the proper management of foul drainage.</i></p>	<p>We are supportive of this principle in so far as it relates to the implications of the North Bexhill allocation itself. It is noted that the IDP Schedule identifies waste water treatment infrastructure</p>

POLICY BX29 CRITERIA	RESPONSE
	improvements under reference UTIO08 but the cost of these improvements is currently known.

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)?

3.2.36 The Interim Sustainability Appraisal (SA) provides an assessment of the proposed options for growth, including the sites identified for allocation. The SA scores the proposed allocations against the objectives of the emerging Local Plan, with reference to SA indicators for more specific assessment under each objective.

3.2.37 The following scoring metric is used in the assessment of these indicators:

++	Significant Positive
+	Minor Positive
0	Neutral or Uncertain
-	Minor Negative
--	Significant Negative

3.2.38 We make the following general observations on the assessment methodology, where it relates to matters that can be addressed through detailed design. We urge the council to consider revising the assessment methodology to ensure that suitable sites are not prematurely discounted given the considerable need for housing in the district.

- **2b** scores any site within Ancient Woodland as having a 'significant adverse' effect. This disproportionately affects the assessment of sites that can suitably accommodate the required ancient woodland buffer within a development proposal. Similar comments can be made on **2d** which refers to priority habitat.
- **2c** scores any site with a TPO as 'minor negative'. The development of a site can avoid any impacts on trees with a TPO.
- **5b** scores any site with land at high risk of surface water flooding as having a 'significant adverse' effect. As above, it is possible design around, and in many cases improve, this risk through technical drainage design. Similar comments can be made on **5c** which refers to ground water risk.

3.2.39 The table below provides our assessment of Site BX36 with reference to the sustainability indicators and assessment criteria.

3.2.40 Please also refer to Question 8 for our comments on the scoring for the proposed development strategy.

INDICATORS	SI RESPONSE	OUR RESPONSE
SA1 - Air Pollution		

INDICATORS	SI RESPONSE	OUR RESPONSE
1a		Support.
SA2 - Biodiversity		
2a		No comment, although it should be noted that this would be addressed in any future planning application and would not prevent the development of this site.
2b		It is demonstrated that Ancient Woodland adjacent to the site can be retained and sensitively designed into the proposal in line with Natural England's Standing Advice. As such the development would not have a 'minor negative' effect. For the reasons above the methodology for this assessment criteria should be revised.
2c		No comment.
2d		Priority habitat adjacent to the site would not be affected by the development. As such it cannot be concluded that the effect would be 'minor adverse'. For the reasons above the methodology for this assessment criteria should be revised.
SA3 - Climate Change		
3a		No comment.
3b		Support, in light of the site's location within the North Bexhill growth area and strategic infrastructure networks.
SA5 - Flood Risk		
5a		No comment.
5b		The areas of surface water flood risk within the site are limited. The future development of the site can avoid these areas and improve the drainage capabilities of the site as part of the drainage design.
5c		This is not considered a constraint to development and can be appropriately considered at application stage.
SA6 - Coastal Erosion		
6a		No comment.
SA7 - Health and Wellbeing		
7a		Support.
7b		Support.
7c		Support.
SA9 - Access to Services		
9a		Support.
SA11 - Heritage		
11a		No comment, although please refer to the submitted Heritage Note which demonstrates that the presence of the adjacent heritage asset is not a constraint to development.
11b		No comment.

INDICATORS	SI RESPONSE	OUR RESPONSE
SA12 - Land and Soil		
12a		No comment, the site is Grade 3 agricultural land. Note that much of the land around Bexhill comprises Grade 3 agricultural land.
SA14 - Water Quality		
14a		No comment.
SA15 - Parks and Countryside		
15a		No comment.
15b	N/A	No comment.
15c		This assessment is inconsistent with other North Bexhill sites which currently fall outside of the settlement boundary (including BEX37 which lies to the north of Haven Brook Avenue). Despite the site's rural location, local character has changed as a result of Haven Brook Avenue and associated engineering works. Landscape impact will reduce as the committed sites to the south are delivered. Please refer to the submitted LVA which provides an assessment of the emerging proposal for BEX0164.
15d		No comment. Greenfield land will need to be used to meet local housing needs.
SA17 - Employment		
17a		No comment.
17b	N/A	No comment.
SA20 - Roads and Travel Choice		
20a		No comment.
20b		No comment.

4 CONCLUSION

- 4.1.1 This representation has been prepared on behalf of Catesby Estates and Rurban Estates Limited in response to Rother District Council's Regulation 18 consultation on the Draft Local Plan 2025-2042.
- 4.1.2 The purpose of this representation is to support the strategic growth identified for North Bexhill and the inclusion of 'Land north of Haven Brook Avenue (east), Bexhill' under draft Policy BX36. It seeks to comment on the scope of the draft policy and on the proposed spatial strategy more generally.
- 4.1.3 Draft Policy BX36 is formed of two land parcels promoted through the Council's Strategic Housing and Economic Land Availability Assessment (HELAA), comprising BEX0164 (Land east of Watermill Lane (north)) and BEX0163 (Land north of A2691 NBAR (east)). Catesby Estates Limited has control of part of Site Reference BEX0164 which has been promoted by the landowner, Rurban Estates Limited.
- 4.1.4 In light of RDC's significant housing need, and in recognition of the proposed further expansion of North Bexhill, land north of Haven Brook Avenue (east) is well placed to deliver a cohesive and landscape-led residential development opportunity which integrates open space and biodiversity enhancements whilst making a valuable contribution to the delivery of up to 230 high-quality new homes, with the necessary infrastructure improvements to support it. The development of this site will be consistent with the Council's preferred spatial options and the ongoing development around Haven Brook Avenue.
- 4.1.5 We are supportive of the inclusion of draft Policy BX36 and comment on how the emerging development on the site will align with the policy objectives. We are generally supportive of draft Policy BX29 relating to the infrastructure requirements for the North Bexhill Growth Area. However, for the reasons set out in the enclosed Education Technical Note, a more central location for the new Primary School with early years provision is considered necessary to meet the objectives of this policy. Additional land to the north of BX36 is available and is put forward for consideration.