



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

Date 23 March 2026
Your ref Rother Local Plan Regulation 18
Our ref Representation ID: 30457

Dear Sir or Madam

**Comments on Rother Local Plan Regulation 18 Q36 (BT2)
Land at Breadsell**

We are writing on behalf of Miskin Land Bare Trust ("MLBT"), in conjunction with Wates Developments, in response to Rother District Council's Regulation 18 consultation on the emerging Local Plan 2025-2042. Our submission concerns land proposed to be allocated under Policy BT2, Land at Breadsell, Battle, which lies immediately north of a wider area of land within Hastings Borough to the south, identified as a 'Potential Development Area' within the emerging Hastings Local Plan.

Our Client's landholding forms the northern component of Breadsell Farm which spans the administrative boundary between Rother District Council ("RDC") and Hastings Borough Council ("HBC"). Both sites are identified as prospective development sites, as set out below:

- Emerging Rother Local Plan Policy BT2 identifies an indicative capacity of "some 145" dwellings on c. 6.95ha, at around 35 dph across a developable envelope of c. 4.17 ha, based on comprehensive delivery with adjoining land to the south.
- HBC's Regulation 18 draft (February 2026) identifies the adjoining land as Policy D1 which identifies a 'Development Potential Area' of 12.03ha (net developable) with a minimum indicative capacity of 360–540 dwellings at 30 - 45dph, subject to masterplanning, in liaison with RDC.

We submit that BT2 should be allocated within the Rother Local Plan as an integral part of the wider Breadsell Farm area. This would make an important contribution to Rother's housing land supply and assist Hastings in meeting its identified need, consistent with national policy and the authorities' emerging strategies.

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We fully endorse the comments made by Wates in relation to BT2.

Housing Need and the Extent of Shortfall

RDC's emerging Local Plan confirms that its housing requirement as set out by the Standard Method 2024 is 912 dwellings per annum (dpa), equating to an identified need of 15,504 dwellings over the plan period between 2025–2042. Against this, the Council's emerging Local Plan Development Strategy proposes provision for a minimum of 7,881 dwellings to 2042, leaving a shortfall of some 7,623 homes. On any view this is a significant gap that requires every suitable, available and achievable site to be retained in the supply.

HBC's Regulation 18 draft proposes a housing requirement baseline of 3,141 - 3,373 net new homes to 2041 against a Local Housing Need as calculated using the 2024 Standard Method of c. 697 dpa (equivalent to 12,546 over the lifetime of the plan). This represents a substantial shortfall of 73% which has resulted in Matthew Pennycook writing to HBC asking that they ensure that 'no stone is left unturned in its efforts to identify land that is suitable for development'.

Whilst not a matter for RDC we note that HBC have identified the area of land within their District as being a 'Development Potential Area' rather than a formal allocation. With RDC only meeting 50% of its housing need and HBC only 27%, clearly both Councils should be using all available means to increase supply. The easiest means to achieve this would be for HBC to formally allocate D1 to immediately contribute to its housing land supply. This underlines the need for a coordinated approach at Breadsell Farm, where capacity and delivery will be most efficiently unlocked through allocation of BT2.

Policy BT2 – Land at Breadsell

It is submitted that land at Breadsell is suitable for allocation.

Site Context

Breadsell Farm is located within the northwestern fringes of Hastings, south of Hastings Road and can currently be accessed off Breadsell Lane. At present the site comprises predominantly arable land with a small area of woodland and individual trees located along a field boundary. The area to the north of the site (on the opposite side of Hastings Road) comprises the Beaufort Park Golf and Country Club (which lies within

the High Weald AONB), the areas to the south and west are further agricultural land, and the area to the east comprises the built-up area of Hastings.

Environmental Characteristics

The site is not subject of any landscape or environmental designations. There are no designated or undesignated heritage assets in proximity to the site. The site lies wholly within Flood Zone 1, i.e. it has the lowest probability of flooding. It is noted that the Marline Valley Site of Special Scientific Interest (SSSI) is located south of the Site, this designation is discussed further below. With regards to the site's environmental characteristics, we therefore note as follows:

- The site is not within any ecological protection area other than for the impact risk zone of the Marline Valley Woods SSSI (discussed below)
- The site is not located within an area designated for its landscape value (although it does sit adjacent to and within the setting of the High Weald National Landscape)
- The site does not include heritage assets, nor would its development likely affect the setting of any heritage assets.
- The site has very few landscape features other than a block of woodland to the southeast and trees and hedgerows to the site boundaries. It is anticipated that development of the site would wholly retain these landscape features other than need for hedgerow removal to facilitate a site access. There will be ample opportunities within the site to provide replacement hedgerow planting.
- The site is not located within an area designated for its ecological interest. It is anticipated that a 10% net gain in biodiversity would be achieved on site as part of a future development.
- The site is located within Flood Zone 1 and is within an area of low risk to surface water flooding.
- An access strategy has been developed by Wates (see Wates Vision Document), confirming that a suitable access on to the A2100 could be achieved.

As set out above, the site is currently accessed from Breadsell Lane which comprises a Public Right of Way providing connectivity through the Site to Queensway and the Castleham Industrial Estate. There are two bus stops located close to the access of the site along Hastings Road (reachable from the site along a footpath), which provide hourly services to shops and facilities, both locally and within Bexhill, Battle, Hastings, and St. Leonards. The site is also within a 5 km cycle distance to Battle and Crowhurst Railway Stations, with Battle Railway Station providing regular mainline services to London. The site is also a 2.5 km cycle to retail facilities within Hastings Retail Park, Sedlescombe Road. From a transport perspective it can be concluded that new residents

will have opportunities to reach facilities and services by means other than private motor car, which will be further enhanced by the proposed development.

Marline Valley Wood SSSI

The site lies adjacent to the Marline Valley Woods SSSI, this led to the proposed strategic allocation west of Hastings not being progressed during the last Local Plan examination due to concerns raised by Natural England. The SSSI is designated primarily due to the area featuring steep sided gill woodlands and Bryophyte plants. The main concerns raised by Natural England relate to potential impact on watercourses within the SSSI because of alterations to natural drainage patterns within its catchment area.

The Vision Document submitted by Wates confirm that they are working with both RDC, HDC and Natural England on a programme of ecohydrological monitoring, undertaken by Hilson Moran, to establish the baseline hydrological conditions supporting the SSSI. This data will inform a drainage strategy designed to maintain existing surface water and sub-surface flow patterns, demonstrating that development can proceed without adverse impacts on the SSSI.

Highways and Sustainability

Land at Breadsell Farm lies just to the west of the built-up area of Hastings and can be accessed directly from Hastings Road. It is noted that a good bus service operates within walking distance from the site offering hourly services to Battle and Crowhurst railway stations, as well as to the town centres of Battle and Hastings. The site is also within cycling distance to areas of employment. The development of additional housing in this area could support the sustainability of existing and additional shops and services within the local area. There are opportunities to provide connectivity from the site to the PRoW network to provide pedestrian access to Hastings, in addition to the existing connectivity along Hastings Road.

The Vision Document submitted by Wates demonstrates how a Sustainable Transport Strategy would be adopted for the site which will enhance local transport and public access infrastructure for existing and proposed residents. Therefore, our view is that development of the site for housing would be acceptable from both a highway and transport perspective. It can be concluded that development of the Site would be supported by a range of sustainable transport modes that would provide accessibility to a range of shops and services within Hastings and Battle. Consequently, it is considered that there would be no transport and access grounds that would prohibit delivery of the Site for housing.

Landscape Impacts

Whilst the site is located adjacent to the High Weald National Landscape the site is well contained by existing development and hedgerows to its western boundary. The Landscape Visual Impact Assessment prepared for previous submissions to past versions of plan preparation confirms that the site is well contained and that its development for housing would only have significant negative impacts from a single viewpoint close to the site (as expected for any proposal introducing development to a greenfield site). However, providing that a suitable landscaping scheme is utilised, the site would be suitable for residential development.

It should be noted that Land at Breadsell lies within a small area of the District that is not constrained by the High Weald National Landscape, or by other locally or nationally recognised designations. The proposal for developing this site would be considerably less harmful than many other locations within Rother. Consequently, delivery of this Site for housing would assist in reducing the pressure to develop more sensitive sites in the District.

Conclusion and Summary

Given the scale of identified housing need in both authorities and the substantial shortfall between need and planned provision, BT2 makes an important contribution to housing land supply within Rother. Importantly it will also assist in the delivery of land within Hastings. Our Client has an agreement with Wates to promote this site as part of a comprehensive development at Breadsell Farm.

As set out in the Vision Document submitted by Wates, BT2 is not subject to any landscape, heritage or ecological designation, lies wholly within Flood Zone 1, and is capable of being served by a satisfactory vehicular access from the A2100 Hastings Road. An initial landscape appraisal (see Wates Vision Document) has confirmed that, subject to an appropriate landscaping scheme, the site can accommodate residential development without giving rise to unacceptable landscape harm. Critically, the site lies within one of the few areas of Rother District that is not constrained by the High Weald National Landscape or other nationally recognised designations, meaning that its development would be considerably less harmful than many alternative locations.

In summary, the allocation of BT2 is strongly supported by national policy and the emerging evidence base of both local planning authorities. The site is suitable, available and achievable. It would deliver much-needed housing in a sustainable location, assist both Rother and Hastings in addressing their acute housing shortfalls, and represents a logical and efficient use of land that is less constrained than the vast majority of the



District. Our Client supports the allocation of BT2 within the Rother Local Plan 2025–2042 and looks forward to continuing to work proactively with Hastings Borough Council to ensure the comprehensive and coordinated delivery of the wider Breadsell Farm site.

Yours faithfully



Daniel Frisby
Associate Planner
For and on behalf of
DMH Stallard LLP