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

Via email - [draftlocalplan@rother.gov.uk](mailto:draftlocalplan@rother.gov.uk)

Dear Sir or Madam

## **LOCAL PLAN REPRESENTATIONS IN RELATION TO LAND SOUTH OF BARNHORN ROAD, BEXHILL – DRAFT ALLOCATION BX22**

These representations are submitted by Bidwells LLP on behalf of Richborough, the promoter of Land South of Barnhorn Road, Bexhill (the site). Richborough is promoting the site through the emerging Rother Local Plan process.

Richborough's objective is to bring forward a comprehensively planned, residential-led development that responds positively to the site's opportunities and constraints. This submission is accompanied by a Vision Document showing how the site could be developed (enclosed). This explains how a high-quality urban extension to West Bexhill can be delivered, supported by strong walking, cycling and public transport connections, landscape and ecological enhancement, and the infrastructure necessary to support a sustainable new community. The Vision Document also demonstrates that development can be structured in a way that retains and enhances important landscape features, respects the setting of nearby heritage assets, and responds appropriately to the relationship with the Pevensey Levels.

The purpose of these representations is therefore to respond to the draft allocation and associated policy framework, and to explain how Richborough propose to deliver development on the site in a manner consistent with the emerging Local Plan objectives. In doing so, the representations are intended to assist the Council in refining the allocation, confirming its deliverability, and ensuring that the site can make an effective contribution towards meeting housing and wider development needs in Bexhill and across the district.

### **The Site and its Context**

The site lies on the western edge of Bexhill-on-Sea, immediately to the south of Barnhorn Road (A259). It extends to about 30.8 hectares and is bounded to the north by existing residential properties fronting Barnhorn Road, with agricultural field boundaries to the east, south and west. The land is predominantly undeveloped and comprises Grade 3 agricultural fields. The site has an irregular field pattern, defined by semi-mature hedgerows and tree belts.



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In character terms, the site is a greenfield edge-of-settlement location. The northern edge relates visually to the ribbon of existing housing along Barnhorn Road, while the remainder of the site has an agricultural character. The hedgerows, tree belts and woodland features provide a well-defined field structure and greater enclosure in the central and eastern parts of the land.

The principal land use is agricultural. In addition, the eastern part of the wider site context contains a cluster of existing buildings, including Barnhorne Manor Lower Barnhorne and associated farm buildings and residential properties. Barnhorn Manor Caravan Park lies to the south east of these buildings and is accessed from within the site. The site is also crossed by public rights of way, which are an important part of its existing spatial structure and relationship with the surrounding countryside.

### **Access and movement**

The site fronts Barnhorn Road, and the emerging evidence indicates that vehicular access would connect in to this from the north (either via a new roundabout to the west as per the roundabout or connecting to Barnhorn Road further east). There are existing facilities in the area, including:

- Little Common District Centre lies to the east of the site and is identified as an existing focus for day-to-day services and facilities that should be connected to the site by improved walking and cycling links.
- Cooden Beach railway station lies to the south east of the site and is expressly referenced in the emerging plan as a key destination for improved pedestrian and cycle connectivity.
- Existing bus services operate along Barnhorn Road on the site's northern frontage, with current bus stops located close to, or immediately adjacent to, a range of potential access points.
- Barnhorn Road itself provides direct connections eastwards to Bexhill and Hastings, and westwards to Eastbourne and Brighton, reinforcing the site's relationship with the wider network of services, employment and facilities.

### **Designations affecting the site**

The site is not within a designated area of international, national or local landscape importance within the proposed development site itself, nor any key views protected by policy.

That said, a number of environmental and heritage designations affect the site and its immediate surroundings. Cooden Wood, adjoining the site, is identified as Ancient Woodland. Parts of the wider landholding at the southern edge fall within the Pevensy Levels designations (although this is not proposed for any form of development), namely the Special Area of Conservation (SAC), Ramsar site and Site of Special Scientific Interest (SSSI). The Pevensy Levels SSSI extends into the south-east and south-west of the site boundary. In heritage terms, there is a Grade II listed building within the eastern part of the site, Barnhorne Manor.

The southern edge of the site is within Flood Zones 2 and 3, along with ponds, streams, and ditches associated with the wider Pevensy Levels system (although this element would not be developed). Public rights of way cross the site, and they are an opportunity for structuring movement and green infrastructure within the new development.

As demonstrated by the site's allocation and the Vision Document, these constraints primarily affect the site's fringes and can be mitigated through appropriate design and landscaping.

### **Proposed Development and the draft allocation**

The site has a draft allocation (Policy BX22) which is summarised as follows:

- Residential-led mixed-use development comprising around 400 dwellings.
- Around 3,000 sq m of employment floorspace, or an equivalent alternative commercial use, which may include tourism accommodation or tourism uses.
- Community uses as part of the overall development mix and wider infrastructure requirements.
- An indicative residential density of around 40 dwellings per hectare.
- Development to come forward in accordance with Policy BX18 and the wider West Bexhill Growth Area infrastructure requirements.
- A landscape-led form of development and Substantial public open space, including play space and formal playing pitch provision (subject to need).

We explore the appropriateness of this draft allocation in later sections.

### *Vision Document*

Richborough's vision is for a high quality, residential-led extension to Bexhill that delivers a new neighbourhood in a comprehensive and landscape-led way. The site is capable of accommodating a significantly greater level of development than is currently reflected in the draft allocation, while still responding appropriately to its constraints and delivering a scheme within a strong green infrastructure framework. The vision is not for a stand-alone housing estate, but for a well-connected and distinctive place that integrates homes, open space, movement routes and supporting uses.

The key components of the vision include:

- a residential-led scheme delivering a greater number of homes than currently assumed in the draft allocation (and a smaller scheme that delivers within the confines of the existing allocation).
- a landscape-led masterplan shaped around existing hedgerows, woodland edges, water features and public rights of way
- a substantial network of public open space and green infrastructure, including informal recreation, biodiversity enhancement and a strong landscaped edge to the countryside
- a range of character areas and densities, with more efficient use of the most accessible parts of the site
- a broad mix of homes, including market and affordable housing
- improved pedestrian and cycle connections through the site and to surrounding destinations

The Vision Document also supports a flexible approach to the non-residential elements of the scheme. In particular, while the draft allocation refers to commercial and tourism-related uses, the commercial viability of those elements is still being explored. Overall, the site will be planned through a flexible and positively framed allocation that allows the masterplan to evolve, supports the optimisation of housing delivery, and provides a clear basis for bringing forward a sustainable and well-designed extension to Bexhill.

### **Allocation BX22**

### *Approach to the Draft Allocation*

Richborough supports the allocation of the site in principle. However, the current drafting does not yet strike the right balance between setting a clear framework for delivery and allowing the site to come forward in the most effective and sustainable way. The Richborough Vision Document demonstrates that the site is capable of supporting a more ambitious residential-led scheme within a landscape-led structure, while also accommodating green infrastructure, community uses and a flexible mixed-use element. In that context, the comments below are intended to assist the Council in refining the policy so that it reflects the site's full potential and does not unnecessarily constrain delivery.

### *Number of dwellings*

The draft allocation currently assumes around 400 dwellings. Richborough's position is that the site can support a materially greater number of homes than this through a comprehensive masterplanned approach. The Vision Document is explicitly based on maximising the site's development potential, establishing a range of densities across the site, and creating a residential extension to Bexhill that makes efficient use of a sustainable edge-of-settlement location.

A higher number of homes can be supported because:

- the site is of sufficient scale to accommodate a broader range of development parcels within a comprehensive framework;
- the Vision Document shows how the site can deliver a landscape-led structure rather than large areas of inaccessible land;
- the site can accommodate a range of housing densities in different character areas;
- the proposals integrate homes with open space, green infrastructure and supporting uses rather than treating these as competing objectives; and
- Bexhill is a key focus for growth within the emerging strategy, making it important that strategic sites are used efficiently.

### *Density*

For similar reasons, the indicative density approach in the allocation should not be treated as a fixed limit. The Vision Document supports a gross density of around 35 to 45 dwellings per hectare (with an average of 40 dph) and expressly proposes a range of densities across the site, with lower intensity development at the more sensitive edges and medium to higher densities in the more contained and accessible parts of the scheme. That is a more appropriate way to plan a site of this nature rather than relying on a single flat density assumption.

The policy should therefore allow density to respond to the site's different character areas and to the detailed masterplanning process. A varied density strategy would enable the scheme to optimise delivery while still respecting the landscape edge, existing vegetation, heritage sensitivities and the wider green infrastructure framework shown in the Richborough material.

### *Access*

The allocation should also be sufficiently flexible in relation to access. The Richborough Vision Document shows that several primary access options are being tested, each connecting to Barnhorn Road. On that basis, there is a credible route to providing vehicular access to serve the site. The policy should therefore

recognise that access can be achieved, while leaving the final form of that access to be resolved through further technical work.

#### *Employment floorspace/Tourist and visitor accommodation*

The current allocation suggestion for around 3,000 sq m of employment floorspace, or an equivalent alternative commercial use, should not be applied rigidly without regard to market demand, placemaking and deliverability. The policy would be more effective if it retained flexibility for the final commercial offer to be shaped through the next stage of testing.

The same applies to tourist and visitor accommodation. The current allocation suggests this as a possible alternative commercial use, but this provision should not be treated as a fixed requirement. Instead, the appropriate approach is for any tourism or visitor-related element to be considered through commercial viability and market testing, or there is significant potential for the housing potential of the site to be unnecessarily constrained.

The policy should therefore remain flexible. It may be that tourist or visitor accommodation has a role to play, but that should be determined by evidence of demand and viability rather than prescribed at allocation stage.

#### *Community facilities and wider West Bexhill provision*

Richborough supports the principle that the wider West Bexhill Growth Area should deliver a broad range of community facilities and supporting infrastructure. The Council's material identifies that package as including education, local shopping and services, health provision, green and blue infrastructure, sports provision and indoor community meeting spaces. Richborough's own Vision Document similarly supports community infrastructure and a mixed-use local centre that complements existing centres rather than competing with them.

At present, however, there remains insufficient clarity as to which site is expected to provide which element, and how those responsibilities are to be shared fairly across the wider growth area. The Council has indicated that the larger allocations will deliver services and facilities for the wider area, with equalisation to be agreed across the whole area, potentially through a developer forum approach. That direction of travel is understandable, but it leaves uncertainty at this stage as to what is appropriately expected from BX22 in practice.

The policy framework would therefore benefit from a clearer approach to;

- which strategic community facilities are intended to be delivered across the wider West Bexhill area;
- which of those are expected on particular sites;
- which requirements are to be met through direct provision, and which through contributions; and
- how equalisation and cost-sharing will operate between the various allocations.

Until that work is further advanced, the allocation should avoid being overly prescriptive about the precise form of community provision to be delivered on this site.

We have set out our approach to each of the policy requirement of the allocation below on a line-by-line basis.

#### *Summary Policy Table*

<b>Allocation element</b>	<b>Draft allocation position</b>	<b>Our Position</b>	<b>Suggested reps point</b>
Overall principle	Residential-led mixed-use allocation	Support	We support the allocation of the site for a residential-led mixed-use development. The site is a suitable and sustainable location for growth and is capable of making an important contribution to housing delivery in Bexhill and across the district.
Number of dwellings	Around 400 dwellings	Support in principle, but seek uplift	The allocation should be amended to allow for a higher number of homes. The Vision Document demonstrates that the site can support a materially greater quantum of development through a comprehensive, landscape-led masterplan, making more effective use of a strategic site in a district with acute housing need and persistent under-delivery.
Density	Indicative density of 40 dph	Support a flexible density approach	The draft density should not operate as a cap. Richborough's vision supports a varied pattern of development, with higher densities in the most accessible and contained parts of the site and lower densities in more sensitive edge locations. This supports a greater overall quantum while still responding appropriately to landscape and heritage considerations.
Built area / developable area	Local Plan assumes c. 12 ha built area within a c. 24 ha allocation	Seek a less prescriptive approach	The policy should avoid an overly rigid assumption about the developable area. Richborough's vision work shows that development can be structured around retained green infrastructure, habitat buffers, SuDS and public open space, whilst still supporting a more efficient level of housing delivery.
Employment / commercial floorspace	c. 3,000 sq m employment floorspace or equivalent alternative commercial use	Seek flexibility	The policy should retain flexibility rather than prescribe a fixed employment quantum. Richborough's vision supports a mixed-use neighbourhood hub, but the exact amount and type of commercial floorspace should be informed by market demand, placemaking objectives and viability.
Tourism use / tourism accommodation	Alternative commercial use may	Do not object, but retain optionality	We do not object to tourism-related uses being referenced, but the policy should make clear that these are optional rather than mandatory. Richborough is exploring

<b>Allocation element</b>	<b>Draft allocation position</b>	<b>Our Position</b>	<b>Suggested reps point</b>
	include tourism uses or accommodation		the commercial viability of tourism and other commercial uses, and the allocation should allow the most appropriate form of non-residential development to come forward.
Community uses	Community uses expected as part of the allocation	Support	We support the inclusion of community uses as part of a balanced, residential-led scheme. The policy should, however, allow flexibility as to the precise form, scale and timing of those uses so they can evolve alongside the masterplan and wider West Bexhill infrastructure strategy.
Housing mix	Residential-led scheme, subject to wider plan policies	Support, with emphasis on broad mix and specialist homes	We support a broad range of homes, including affordable housing . The allocation should be flexible enough to accommodate a wider housing offer that responds to identified local need and market demand.
Open space / green infrastructure	Substantial public open space, play space, possible playing pitches, BNG	Support	Richborough supports a landscape-led masterplan with substantial green infrastructure, public open space, recreation and biodiversity enhancement. This is a core part of the site vision.
Playing pitches / sports provision	Formal playing pitches subject to demand	Support in principle, but seek flexibility on delivery form	We support meeting sports and recreation needs, but the policy should allow sufficient flexibility for the final form and location of provision to be determined through the wider growth area strategy and evidence of demand.
Landscape-led design	Development to protect Pevensey Levels setting and provide appropriate edge	Strongly support	Richborough's vision is explicitly landscape-led. Development should be shaped around existing hedgerows, woodland, water features, topography and the visual relationship with the Pevensey Levels. This is a strength of the allocation, not a constraint on it, and it supports a higher quality and more distinctive form of development.
Ancient woodland buffer	15m semi-natural habitat buffer to Cooden Wood	Support	We support the retention and management of an appropriate buffer to ancient woodland. This is already embedded within Richborough's emerging approach and should be retained within the policy.

<b>Allocation element</b>	<b>Draft allocation position</b>	<b>Our Position</b>	<b>Suggested reps point</b>
Hedgerows, trees and woodland	Retain and enhance existing features, save limited removal where necessary	Support	Richborough's vision is based on retaining and enhancing the existing landscape framework. This is one of the key reasons why the site can support a strong place-making response and a robust green edge to development.
Ponds, streams and ditches	Retain and protect with appropriate buffers	Support	We support this approach. Richborough's Vision Document treats these water features as structuring elements of the masterplan and part of the wider green and blue infrastructure network.
SuDS / HRA / water environment	Appropriate Assessment and three-stage SuDS treatment train	Support	We support a policy approach that secures an appropriate drainage and water quality strategy. This should, however, be framed as an evidence-led technical exercise rather than as a reason to underplay the site's capacity in principle.
PRoWs / active travel	Retain PRoWs and provide improved pedestrian and cycle links	Strongly support	Richborough's Vision Document positively responds to the existing PRoW network and treats it as part of the place-making structure of the scheme, helping to link the site to surrounding destinations and support a more walkable pattern of development.
Access	Access from Barnhorn Road	Acknowledge requirement	Richborough recognises that the development must be served appropriately from Barnhorn Road. Our Vision Document shows that there is a range of options that are suitable to deliver access onto Barnhorn Road.
Heritage	Protect setting of listed building(s)	Support	We support a policy requirement to respond sensitively to heritage assets. Richborough's vision is capable of accommodating development in a way that respects the setting of nearby listed buildings through layout, open space, planting and the management of built form at sensitive edges.
Archaeology	Assessment and mitigation required	Support	We support the inclusion of a standard archaeological requirement, to be addressed through the normal evidence-led process.

Allocation element	Draft allocation position	Our Position	Suggested reps point
Relationship with BX18 / wider infrastructure	Site to contribute to wider West Bexhill infrastructure	Support in principle, but seek proportionate and flexible wording	We support the principle that BX22 should play its part in delivering the wider West Bexhill strategy. However, the policy should ensure that contributions are proportionate, evidence-led and do not unnecessarily constrain the site's ability to deliver an optimised quantum of housing.

### Plan-wide Matters Where Further Work May Assist the Council

Richborough supports the preparation of the emerging Local Plan and wishes to assist the Council in ensuring that it is legally compliant and sound at examination. The comments below are therefore made from a critical friend perspective. They are not directed at the principle of growth in the district, but at helping to ensure that the Plan is supported by a sufficiently robust process, evidence base and delivery framework by the time it is submitted.

#### *Duty to Cooperate*

The most obvious area where the Council will need to ensure its position is particularly robust is the Duty to Cooperate. The draft Plan explains that the Council has approached neighbouring and nearby authorities regarding the potential to accommodate unmet housing needs, and that those authorities have indicated that they are unable, or do not expect, to do so. That may ultimately be the correct outcome. However, given the scale of the gap between the standard method figure and the housing target the Council is proposing to plan for, this is likely to be a matter of close scrutiny at examination.

From a legal compliance perspective, the key issue will not simply be whether contact has taken place, but whether engagement has been constructive, active and ongoing in relation to strategic cross-boundary matters. The Council would therefore be assisted by ensuring that the submission version of the Plan is accompanied by a clear and comprehensive Duty to Cooperate record, showing:

- which authorities and prescribed bodies have been engaged
- when that engagement took place
- what strategic matters were discussed
- what positions were advanced by each party
- what follow-up engagement took place
- where agreement was reached and where it was not

In particular, the Council should ensure that any relevant Statements of Common Ground are in place, or well advanced, by submission stage. If those documents are not yet available, this is likely to be an important area for further work.

#### *Unmet need and the justification for the housing target*

Separate from the Duty to Cooperate itself, the Council will need to ensure that the justification for planning below the standard method is very clearly evidenced and expressed. The district's constraints are well known and may well justify a reduced figure. However, this will need to be demonstrated through a clear narrative that shows the Council has not simply selected a lower target because it is easier to deliver, but because there are genuine policy and environmental reasons why full need cannot be met.

To assist the Council, it would be helpful for the final evidence base and supporting text to show clearly:

- how the standard method figure has been considered
- what specific constraints prevent full provision
- how those constraints have been applied spatially and consistently
- whether all reasonable opportunities to increase supply have been tested
- how any residual unmet need has been addressed through the Duty to Cooperate process

That justification will need to be especially clear because unmet need, once identified, tends to make examination scrutiny more exacting across the rest of the Plan.

#### *Statements of Common Ground and prescribed bodies*

Beyond neighbouring authorities, the Council may also benefit from ensuring that the position of key prescribed bodies is clearly documented. This is particularly relevant where the Plan depends on the agreement or cooperation of infrastructure providers, statutory agencies or transport bodies.

As a matter of examination readiness, the Council may wish to ensure that Statements of Common Ground are prepared, where relevant, with bodies such as:

- East Sussex County Council
- National Highways
- Natural England
- water and wastewater infrastructure providers
- NHS bodies and other infrastructure agencies, where strategic infrastructure delivery is material to the Plan

This is not just an administrative matter. If strategic infrastructure, environmental mitigation or transport capacity are important to the Plan's overall soundness, the Inspector is likely to want confidence that the relevant bodies have been engaged properly and that any areas of disagreement are clearly identified.

#### *Trajectory, phasing and deliverability*

The draft Plan indicates that a detailed housing trajectory has not yet been finalised and that further work is needed with landowners and infrastructure providers to determine realistic delivery rates. That is understandable at this stage, but it will need to be resolved before submission.

From a soundness perspective, the Council will need to ensure that the final Plan is supported by:

- a clear housing trajectory

- realistic assumptions on lead-in times and build-out rates
- an explanation of how phasing relates to infrastructure delivery
- evidence that the strategy is deliverable over the plan period

If these matters remain too open-ended, there is a risk that the Plan could appear aspirational rather than deliverable. The Council would therefore be assisted by firming up these assumptions as early as possible. From the perspective of Land South of Barnhorn Road, it is expected that the site can begin delivering homes soon after planning permission is granted.

#### *Infrastructure Delivery Plan and evidence base maturity*

The Plan currently places substantial weight on the Infrastructure Delivery Plan and other evolving technical evidence. Again, that is understandable at this point in the process. However, by submission stage, the infrastructure evidence will need to do more than identify broad categories of infrastructure need. It should provide a clear basis for understanding what infrastructure is required, when it is needed, who is expected to deliver it, how it is expected to be funded, and whether the delivery assumptions are realistic.

The Council may therefore be assisted by ensuring that the next stage of the evidence base gives clear answers on:

- priority infrastructure requirements
- timing and trigger points
- estimated costs
- funding sources
- delivery agencies
- dependencies between infrastructure and development

Without that degree of clarity, the Plan may be more vulnerable to challenge on effectiveness.

#### *Viability and cumulative policy burden*

Another area where further assistance may be needed is viability. Where a plan relies on a combination of affordable housing, infrastructure contributions, mitigation requirements and other policy obligations, it is important that the cumulative burden has been tested realistically.

This is particularly important in a constrained district where many sites may face abnormal costs. The Council would be assisted by ensuring that the viability work is sufficiently transparent and up to date, and that it reflects the combined effect of the Plan's requirements rather than considering them in isolation.

If further viability evidence is still in preparation, that should be acknowledged and addressed before submission.

#### *Habitats, flood risk and other technical assessments*

Where the Council is relying on evolving technical work such as HRA, flood risk evidence or other strategic assessments, the key issue will be whether those documents are sufficiently advanced and aligned with the strategy by Regulation 19 stage. The Council may benefit from checking that these pieces of work are not simply being prepared in parallel, but are actively informing the final form of the Plan.

The Plan will be in a stronger position if it can show that:

- the strategy has been tested against the relevant technical constraints
- the technical evidence supports the allocations and overall quantum proposed
- any mitigation requirements are clearly understood
- there are no unresolved technical objections that could undermine implementation

### *Summary*

Taken together, these are not reasons to depart from the Local Plan process. Rather, they are areas where further work may assist the Council in strengthening the Plan and reducing examination risk. In Richborough's view, the most important priorities are likely to be the Duty to Cooperate record, Statements of Common Ground, the justification for the reduced housing target, the maturity of the infrastructure and trajectory evidence, and the overall alignment of the technical evidence base with the development strategy.

### **Conclusion**

In conclusion, Land South of Barnhorn Road is a sustainable and suitable location for growth within the emerging plan. As the document states, the site sits within the West Bexhill Growth Area and is well positioned directly south of the A259 corridor, giving it convenient connectivity to nearby services and amenity. That is an important starting point.

The vision for the site should therefore be carried forward in to the draft allocation in its next iteration. The representations explain that Richborough are seeking to deliver a high-quality development consistent with the emerging allocation, and that the site forms part of a wider strategy for West Bexhill to come forward through policy BX18 and associated infrastructure planning. On that basis, the benefits of the site are not limited to housing numbers alone. The site can help deliver new homes in a location with good strategic connectivity, while also contributing towards the wider infrastructure, placemaking and sustainable community objectives that the Council is seeking to secure across West Bexhill.

There is also a clear case for the allocation to allow for more homes to be delivered, where the evidence shows this can be achieved appropriately. The Vision Document already recognises that further key evidence is still to be prepared following this Regulation 18 consultation, including transport modelling, further habitats work, flood risk work and a green and blue infrastructure study. That matters because it shows the strategy is still evolving. In those circumstances, the plan should not unnecessarily fix a level of development too early where subsequent evidence, design work and masterplanning may demonstrate that the site can support a greater quantum of development in a sustainable and policy-compliant way.

Against that background, the most helpful way to refine the plan is through a constructive critical friend recommendations we have made. In our view, the next iteration of the plan should:

- retain a positive in-principle allocation of the site in recognition of its sustainable location within the West Bexhill Growth Area
- keep sufficient flexibility on capacity so that the final number of homes can respond to evidence, design development and masterplanning work
- ensure infrastructure expectations are clearly linked to the further evidence now being prepared, rather than being set prematurely
- continue to embed the site within a coordinated masterplan-led framework under policy BX18 so that delivery of homes, infrastructure and wider community benefits is properly aligned across the growth area.

We look forward to working with you to deliver a high quality, landscape-led development at Land South of Barnhorn Road.

Yours faithfully

**Jamie Sullivan**  
Partner