EXECUTIVE SUMMARY

FINAL DRAFT – 20 Oct 26

Please read this first in order to understand the later comprehensive report

Introduction

The RDC Plan was discussed with the Town Clerk at a meeting on 29 September 2026. It was jointly agreed that the best way to proceed was to compile an in-depth review of the Rother District Council's recently published new Plan for Bexhill-on-Sea in the period 2025-2042. The RDC Plan is a Regulation 19 Proposed Submission that has not yet been adopted. We agreed that the review of the RDC plan should be divided up into four parts: (1) Flooding – (2) Insurance Risk – (3) Infrastructure requirements – (4) Northeye Asbestos Risk.

In conducting this review, I have carried out an overall analysis and a ward-by-ward analysis. **Sidley Ward** and **St Marks Ward** contain the greatest concentration of proposed housing. However, other wards also face significant flooding and infrastructure concerns.

KEY FINDINGS

Up to 4,474 proposed homes (4,464 baseline plus up to 10 conditional); approximately 79% of baseline capacity provisionally concentrated in two wards; housing-allocation boundaries equivalent to about 7.2% of the reported parish area; 12 sites requiring high-priority flood scrutiny; and unresolved infrastructure delivery and funding questions.

RDC's principal housing allocations collectively cover land equivalent to approximately 7.2% of Bexhill's reported geographical area. This indicative comparison requires validation against consistent GIS boundaries. Impacts will be uneven, with substantial development concentrated in northern and western Bexhill.

Bexhill: how much land is involved?

Approximate reported geographical area of Bexhill-on-Sea civil parish: 32,310,000 m² (12.47 square miles; approximately 3,231 hectares). The precise parish boundary area and alignment with allocation boundaries should be confirmed by RDC before these percentages are treated as definitive.

Land-area comparison

Land category	Area in square metres (square miles)	% of Bexhill
Total Bexhill area	32,310,000 (12.47)	100%
Housing allocations on predominantly greenfield sites	1,503,100 (0.580)	4.65%
Housing allocations on brownfield sites	67,700 (0.026)	0.21%
Housing allocations on mixed or uncertain land	761,900 (0.294)	2.36%
Total housing allocation sites	2,332,700 (0.901)	7.22%
All housing, employment and other individual development allocations	2,586,400 (0.999)	8.00%
Housing sites containing some mapped Flood Zone 2 or 3 land	1,472,000 (0.568)	4.56%*

*The final table row refers to the whole boundaries of 11 housing sites containing some mapped Flood Zone 2 or 3 land. It is NOT the area actually at risk of flooding, and overlaps the housing totals above. Brownfield/greenfield labels are preliminary site-wide classifications, not parcel-level surveys; mixed sites include both types of land. All percentages use the approximate 32.31 km² parish comparator and should be checked using matching GIS boundaries.

Sources: RDC, Rother Local Plan 2025–2042, Regulation 19, Part 2 (October 2026), Chapter 10; RDC Housing and Economic Land Availability Assessment (2026).
Flood evidence: Bexhill Flood Risk Evidence Review for the Town Clerk (18 October 2026), based on the 2026 Strategic Flood Risk Assessments and earlier East Sussex surface-water records.

The housing total covers the 35 principal residential or residential-led allocations. Barnhorn Green's 15,800 m² medical/employment allocation, with its conditional housing alternative, is excluded from that subtotal but included in the all-development figure.

How much of Bexhill would the housing allocations cover?

The 7.2% comparison measures complete proposed housing-site boundaries against the reported parish area. It does not represent building footprints or sealed ground, and the boundary comparison remains provisional. Housing-allocation boundaries: about 7.2%; remainder of the reported geographical area: about 92.8%.

In other words, approximately 0.901 square miles of land falls within the housing allocation boundaries, in a parish of approximately 12.47 square miles. This does not mean that 0.901 square miles will be covered by buildings or impermeable surfaces: these sites also include retained woodland, sports provision, gardens, drainage areas, green corridors and other open space.

The floodplain question

This is where we need to be especially careful. The total area of housing sites containing some mapped floodplain: **1,472,000 m²** (0.568 square miles). This is a large area of land requiring investigation. However, we cannot yet state how many square metres within those sites actually lie in the floodplain. For example, a 200,000 m² development site may contain only 20,000 m² of floodplain, with the remainder unaffected by mapped river flooding. Nor does mapped floodplain automatically mean that a future property will be uninsurable. Insurability depends on the actual building location, flood-protection measures and insurers' assessments.

Insurance qualification. Insurers assess flood risk independently of planning decisions. Even where developers propose land raising, drainage improvements or other mitigation, affordable buildings and flood insurance cannot be assumed. Insurability must be examined at individual-property level, particularly because newly completed dwellings are excluded from Flood Re.

Note: Flood Re is a UK scheme established in 2016 to help insurers offer affordable flood insurance to households in areas at high risk of flooding. It works by allowing participating insurance companies to transfer the flood-risk element of eligible household policies to Flood Re. Importantly for the Rother Local Plan report, properties built on or after 1 January 2009 are excluded from the scheme, potentially leaving owners more exposed to commercial insurance premiums, excesses and availability.

Further evidence required. A defensible total for the area actually exposed to flood risk requires RDC to overlay the allocation boundaries, individual proposed building plots and access routes with Environment Agency flood mapping, surface-water mapping and climate-change allowances.

My assessment is that 7.2% of a town's total geographical area being allocated to potential housing development is substantial enough to warrant close scrutiny, but the percentage alone cannot establish that the development is excessive. Three considerations are particularly important:

First, much of Bexhill's land is already developed or environmentally constrained. We cannot assume that the remaining 92.8% is available for housing.

Second, greenfield land is finite. My calculations show that more than 1.5 million square metres of predominantly greenfield sites are included in the housing allocations, with further greenfield land within mixed sites. Not all of that land will be built upon, but development could fundamentally change its landscape character.

Third, the effect is not evenly distributed. As my ward assessment demonstrates (see Appendix A), approximately four-fifths of proposed homes are concentrated in Sidley and St Mark's. Therefore, an apparently modest percentage of Bexhill's total area could produce much more dramatic changes in particular communities.

Considerations for the Town Council

The proposed housing and associated development allocations have a combined reported site area of approximately 2.59 million square metres (about one square mile, or 8% of the reported parish area). Principal housing allocations account for about 2.33 million square metres. Substantial areas are classed provisionally as greenfield, while other sites contain mixed or previously developed land. Some allocations include mapped floodplain, but neither the area actually flood-prone nor the permanently developed footprint has yet been measured. These uncertainties require a parcel-level land-take assessment and mapped, cumulative flood-risk analysis before definitive percentages are used.

Bexhill Town Council cannot itself veto housing allocations, refuse planning permission or require RDC to abandon a development site. RDC is currently the local planning authority preparing the Regulation 19 Local Plan and determining most planning applications. National planning and housing policy constrains its discretion, but it does not exempt the Plan from statutory examination for legal compliance and soundness.

Public protest is not the only lawful means of challenge. The Town Council can make formal, evidence-led Regulation 19 representations, identify why particular policies or site allocations may fail the tests of soundness, and request participation in the independent examination. This research may therefore be relevant to RDC and the examining Inspector. I remain available to answer questions and undertake further research.

A suggested list of 51 questions for RDC is appended to the end of this Executive Summary and also to the end of the separate and more detailed Main Report.

Population Trends and Future Growth

Historical population growth of the built-up area. Bexhill-on-Sea's population increased from 39,576 in 2001 to 42,369 in 2011 and 43,819 in 2021: a rise of 4,243 (10.7%) over twenty years. Growth slowed during the second decade, with 1,450 additional residents between 2011 and 2021. Our review of RDC housing monitoring indicates approximately 2,333 net additional dwellings recorded between 2006/07 and 2024/25, averaging around 123 per year. These census figures relate to the built-up area; the separate 2021 civil-parish figure has been reported as 43,754 and must not be conflated with that series. Bexhill's older age profile also has implications for healthcare and social-care planning.

Projected development and implications for 2040. The Regulation 19 Local Plan 2025–2042 proposes capacity for up to 4,474 homes in Bexhill (4,464 across the principal allocations, with up to 10 more conditional homes at Barnhorn Green). Spread evenly across 17 years, this is approximately 263 homes annually, more than twice the historical rate of net dwelling additions. At an illustrative 2.4 occupants per home, the maximum capacity could accommodate around 10,740 people. This is NOT a forecast of net population growth: existing residents may move within the town, and births, deaths, migration and the composition and timing of new households will alter the result. Nevertheless, the potential scale of change by 2040 and beyond could bring younger families, employment opportunities and economic activity while increasing demand for schools, healthcare, transport, water, sewerage and community facilities.

The essential challenge is to ensure that the pace of housing development does not exceed the town's ability to provide the infrastructure and services necessary to maintain a satisfactory quality of life for both existing and future residents. The executive summaries of the four areas of review required by the Town Clerk now follow:

PART ONE: Flooding — Risks Associated with Proposed Housing Development

The principal concern. The Rother Local Plan 2025–2042 proposes substantial housing development in parts of Bexhill where river flooding, surface-water flooding, groundwater and inadequate drainage may present significant risks. Climate change, more intense rainfall and rising sea levels could increase these pressures over the lifetime of the proposed developments.

Extent of potential risk. My preliminary assessment identifies **12 housing allocations, comprising approximately 2,728 proposed dwellings, requiring particularly close flood-risk scrutiny**. A further 17 allocations, comprising approximately 1,569 dwellings, require targeted investigation. These figures refer to the total housing proposed on sites with identified constraints; they do not mean that all those dwellings would themselves be situated in flood-prone areas.

Areas of particular concern. RDC's own planning documents identify flooding or drainage constraints affecting proposed developments at Beeching Road, Barnhorn Road, Rosewood Park, Northeye, Watermill Lane, Kiteye Farm, the Combe Haven corridor and Worsham Farm. Some sites contain land within Flood Zones 2 or 3, while others are affected by surface-water accumulation, culverted streams or watercourses requiring protection.

Existing flooding problems. Bexhill has a documented history of surface-water flooding, including incidents associated with Turkey Road, London Road, Westcourt Road and other locations. Earlier investigations identified blocked culverts, sedimented ditches and inadequate drainage as contributing factors. The extent to which recommended remedial works have been completed requires confirmation.

Groundwater and drainage capacity. Particular attention is needed where developments adjoin marshland, watercourses or areas with potentially high groundwater levels. Site-specific groundwater measurements, comprehensive drainage assessments and evidence of sufficient sewerage capacity are required. General flood-risk maps alone cannot establish the suitability of individual building plots.

Consequences for existing residents. Flood-protection measures for new developments, including raising land or building levels and installing sustainable drainage systems, must not increase flooding elsewhere. The cumulative effects of several developments within the same drainage catchment must be assessed, including the consequences of extreme rainfall and future climate change.

Recommendation. Bexhill Town Council should request that RDC publishes detailed, independently reviewed flood-risk assessments for the affected housing allocations. These should demonstrate that proposed dwellings, access routes and essential infrastructure can remain safe throughout their intended lifetimes, without increasing risks to neighbouring properties. Where satisfactory protection, drainage capacity or safe development layouts cannot be demonstrated, proposed housing numbers, layouts or development phasing should be reconsidered.

The central principle is that new housing must not create additional flood risks for either its future occupants or the existing residents of Bexhill.

PART TWO: Insurance Risk — Housing Development in Flood-Prone Areas

The principal concern. The proposed construction of new homes in areas potentially affected by river flooding, surface-water flooding, groundwater or coastal flooding raises important questions about the future availability and affordability of household insurance. Planning permission, even where flood-protection measures are required, does not guarantee that insurers will subsequently offer affordable buildings insurance.

The Flood Re exclusion. Noted above – the Flood Re is a scheme established by the Government and insurance industry to help qualifying households obtain flood cover. Homes completed on or after 1 January 2009 are generally ineligible for its protection. Purchasers of the proposed new Bexhill properties would therefore normally depend upon commercial insurance, subject to each insurer's risk assessment.

Potential financial consequences. Where flood risk remains significant, insurers may impose substantially higher premiums, increased excesses, restrictions on flood cover or, in some circumstances, decline insurance altogether. Difficulties obtaining adequate buildings insurance could affect mortgage availability, property values and the ability of homeowners to sell their properties.

Flood mitigation is not a guarantee. Developers may propose raising land or finished floor levels, floodwater storage, improved drainage and other engineering measures. Although these may reduce risk, they do not necessarily eliminate it. Insurance companies undertake their own assessments, considering flood history, residual risk, drainage conditions and the potential effects of climate change over the property's lifetime.

Relevance to Bexhill. My preliminary examination of RDC's housing allocations identifies several developments requiring particular scrutiny because parts of their sites are exposed to potential flooding or drainage constraints. This does not establish that the proposed houses themselves would occupy flood-prone land or be uninsurable. Nevertheless, it raises legitimate concerns requiring investigation before development proceeds.

Recommendation. Bexhill Town Council should request that RDC obtains independent evidence concerning the likely availability and affordability of buildings insurance for proposed housing on flood-sensitive sites. This should address anticipated premiums, excesses, exclusions, mortgage implications and future climate-related risks. Where significant difficulties are identified, the suitability, layout or density of proposed development should be reconsidered.

The essential principle is that homes should not merely be judged safe enough to obtain planning permission; their long-term insurability and financial sustainability must also be considered.

PART THREE: Infrastructure Requirements

Scale of development. The Rother Local Plan 2025–2042 proposes up to **4,474 additional homes in Bexhill**, potentially accommodating approximately **10,740 residents**, based on an illustrative average of 2.4 occupants per dwelling. This represents the capacity of the proposed housing, not necessarily a net increase in the town's population. Approximately 79% of the principal housing allocations are provisionally located in **Sidley (1,623 homes) and St Mark's (1,913 homes)**, placing particular pressure on infrastructure in northern and western Bexhill. Development in these areas will nevertheless affect services throughout the town.

Transport and highways. Significant additional demands are anticipated on the A259, Little Common roundabout, A269, Ninfield Road, Watermill Lane and town-centre junctions. Although some improvements have already been undertaken, further works may be required. The Local Plan also identifies improved bus services, pedestrian connections and cycling routes. A western bypass is not anticipated during the Plan period.

Education. Three new primary-school and nursery provisions are identified for Worsham Farm, West Bexhill and North Bexhill, together with potential expansion of existing secondary-school provision. However, the published Infrastructure Delivery Plan does not establish definitive construction costs, secured funding or opening dates for the proposed primary schools.

Healthcare and social care. Additional residents will increase demand for GP services, dentistry, community healthcare and adult social care. A proposed new medical centre at Beeching Road has an estimated cost of **£10 million**, but no secured funding was recorded in September 2026. Medical provision is also proposed at Barnhorn Green, although its specification and delivery arrangements remain uncertain.

Water, drainage and other services. Housing growth will increase demand for drinking water, foul sewerage, electricity, waste collection, emergency services, recreation facilities and accessible green spaces. RDC proposes coordinated sewerage improvements and requirements linking housing occupation to infrastructure delivery. However, sufficient network capacity for the combined developments has yet to be demonstrated conclusively in the documents examined.

Principal concern. RDC has identified many appropriate infrastructure improvements, but there remains a significant distinction between **infrastructure proposed, infrastructure funded, and infrastructure actually available when residents move into new homes**. The Town Council should therefore request a comprehensive, costed and independently evidenced Bexhill infrastructure delivery programme, showing existing and projected capacity, funding responsibilities, implementation dates and enforceable requirements linking essential improvements to housing occupation.

PART FOUR: Northeye - Site-Specific Asbestos Risk

Historical background. Northeye was first used by the Royal Air Force as a mobile radio unit in 1940. During the early 1950s, accommodation huts and associated buildings were constructed for RAF Wartling, which closed in 1964. The site subsequently became **HMP Northeye**, a Category C training prison operating from January 1969 until 1992. Existing RAF buildings were reused, additional buildings were erected during the 1970s, and a major prison disturbance and fire in 1986 destroyed a substantial proportion of the establishment. From approximately 1993 to 2010, the site was used as a technical-training campus associated with the **United Arab Emirates (UAE)**. Although asbestos was subsequently identified, available evidence does not establish precisely when individual asbestos-containing materials were installed.

Home Office acquisition and asbestos warnings. The Home Office identified Northeye for accommodation for up to approximately 1,400 asylum seekers, initially intending to adapt existing buildings and construct additional accommodation. However, a **February 2023 geo-environmental assessment specifically warned that asbestos-containing materials in buildings and contaminated ground represented the principal contamination risk**. It recommended further investigation before remediation requirements and costs could be reliably established. Despite these warnings, purchase contracts were exchanged in March 2023, and the Home Office completed the acquisition in September 2023 for approximately £15.4 million.

In May 2023, the Home Office judged the site unsuitable for its original non-detained asylum accommodation programme and subsequently considered detention-related use. By December 2024, ministers had decided not to proceed with asylum accommodation at Northeye. The National Audit Office and the House of Commons Public Accounts Committee subsequently criticised the inadequate due diligence and failure to investigate contamination sufficiently before purchase.

Transfer and housing proposals. On 16 February 2026, the site was formally transferred from the Home Office to **Homes England**, the government's housing and regeneration agency, for potential residential redevelopment in cooperation with Rother District Council (RDC). Homes England proposes demolition of the obsolete buildings, asbestos remediation and eventual housing development.

Housing numbers require reconciliation. The adopted 2019 Local Plan allocated approximately **140 dwellings** at Northeye. RDC's earlier 2026 draft proposed **384 dwellings**, subsequently revised to **364 dwellings** in the September/October 2026 Regulation 19 Local Plan (Policy BX25). However, on 30 September 2026, Homes England informed Bexhill Town Council that its emerging development concept comprised **up to 250 homes**. Importantly, RDC's 364-home allocation includes the former prison and two adjoining agricultural parcels in separate ownership. The smaller Homes England proposal may therefore concern a different land area rather than representing a simple reduction in total development.

Principal concern and recommendation. RDC's Policy BX25 requires a contaminated-land investigation and remediation where necessary but does not expressly identify asbestos. The Town Council should request publication of comprehensive asbestos and contaminated-ground investigations, a costed remediation and demolition strategy, independent verification of completed works, and safeguards for neighbouring residents and watercourses. It should also require RDC and Homes England to reconcile the different housing totals and site boundaries before the Local Plan's housing assumptions are finalised.

Redevelopment feasibility and housing numbers. The decision not to use Northeye for asylum accommodation does not prove that the site cannot be safely redeveloped. Nevertheless, residential use must depend on independently verified remediation. RDC's proposed 364-home allocation covers the former prison and adjoining privately owned parcels; Homes England's emerging concept is for up to 250 homes on its own land. The apparent difference of 114 homes is not an agreed reduction in the Local Plan allocation, and Bexhill-wide or St Mark's ward totals should not be amended until RDC confirms the separate landowners' development capacity.

OTHER SIGNIFICANT ASPECTS FOR CONSIDERATION

Ancient Woodland and Geological Heritage

Ancient woodland protection. The proposed expansion of residential and commercial development around Bexhill creates potential risks to ancient woodland and established wildlife habitats. Several allocated sites, including Spindlewood Drive, Levetts Wood, Haven Brook Avenue, Ninfield Road and Worsham Farm, lie within or adjacent to ancient woodland. Although RDC proposes protective buffer zones and ecological safeguards, development may still cause damage through increased human disturbance, lighting, surface-water runoff, traffic, domestic animals and habitat fragmentation.

Ancient woodland is an irreplaceable habitat which cannot be recreated through ordinary replacement planting. The Town Council should therefore request independently verified ecological assessments of affected sites, appropriate buffer widths, long-term management arrangements and evidence that cumulative development will not damage existing woodland ecosystems.

Ashdown Brickworks — a geological site of exceptional scientific importance. The active clay quarry at Ashdown Brickworks, Turkey Road, is internationally significant for its Early Cretaceous fossils, including dinosaurs and other prehistoric vertebrates. Discoveries include the remarkable Ashdown maniraptoran, considered among the smallest known adult non-avian dinosaurs, together with important dinosaur skeletal remains and evidence of prehistoric ecosystems dating back approximately 135 million years.

RDC's Policy BX36 proposes approximately 400 homes on land west of Ninfield Road, close to the quarry. Although the Local Plan recognises the need to safeguard clay extraction, which is permitted until 2051, it does not expressly address the quarry's outstanding palaeontological importance within this site-allocation policy.

The Town Council should request a specific **Geological and Palaeontological Impact Assessment**, undertaken in consultation with recognised specialists, Bexhill Museum, the Sussex Geodiversity Partnership and the minerals planning authority. This should ensure that nearby residential development, future quarry operations and eventual site restoration do not unnecessarily destroy fossil-bearing geological exposures or prevent important scientific investigations.

Recommendation. RDC should demonstrate that the Local Plan's housing and employment allocations can proceed without unacceptable harm to Bexhill's irreplaceable ancient woodland or the internationally important fossil-bearing deposits at Ashdown Brickworks.

Regulation 19 Representations

RDC confirms that the formal Regulation 19 consultation closes at 23:59 on Tuesday 24 November 2026. Formal representations should address whether the Plan meets the statutory requirements of legal compliance and soundness (including whether its policies and allocations are justified, effective and consistent with national policy).

The research in the main body of the report, reflected in this Executive Summary can inform representations concerning flood modelling, contaminated-land remediation, infrastructure delivery and the deliverability of individual housing allocations. As mentioned above, the suggested list of 51 questions to be asked of RDC is appended below. The eventual precise format of the Town Council's questions and formal representations should be agreed with the Town Clerk after discussion with councillors.

David EP Dennis
Bexhill Town Council Environmental Projects Manager
07969 088186 | 20 October 2026

APPENDIX A | Housing allocations by Bexhill ward

Rother Local Plan 2025–2042 · Regulation 19 (October 2026) · Full provisional ward-based register

Northeye note (19 October 2026): Policy BX25 currently allocates 364 homes across the former prison and adjoining parcels. Homes England's up-to-250-home concept is not an agreed amendment to RDC's allocation; the figures below retain the published BX25 capacity pending reconciliation.

Site-by-site reorganised version of the original Town Clerk development list, with indicative ward assignments from local planning records and street locations. Wards are not the same as RDC planning growth areas.

Nine-ward summary

Electoral ward	Homes (base)	Potential new residents*	Basis / qualification
Central	**341**	818	Address/area-based working assignment
Collington	**0**	0	No BX5–BX47 allocation identified
Kewhurst	**25**	60	Broadoak Lane split; provisional
Old Town and Worsham	**243**	583	Shared Worsham site; provisional split
Pebsham and St Michael's	**177**	425	Shared Worsham site; provisional split
Sackville	**8**	19	Address/area-based working assignment
Sidley	**1,623**	3,895	Address/area-based working assignment
St Mark's	**1,913**	4,591	Address/area-based working assignment
St Stephen's	**134**	322	Broadoak Lane split; provisional

Electoral ward	Homes (base)	Potential new residents*	Basis / qualification
BASE SITE CAPACITY	**4,464**	**10,714**	**PLUS BX22 conditional: 5–10 homes**

Published Bexhill figure: 4,474 homes. The original policy capacities sum to 4,464 firm/indicative housing places; an alternative BX22 scheme adds 5–10 possible homes, producing a maximum of 4,474. The optional homes are shown separately rather than assumed built.

*Population figures are occupants of the new dwellings (2.4 per home), not a forecast of net in-migration. The 4,464 baseline would house about 10,714 people; the 4,474 maximum about 10,738 (rounded to 10,740).

READING THE WARD TABLES: "Address" = matching local street/application evidence; "Area" = approximate nearby ward assignment; "50:50" = numerical allocation where dwelling locations cannot yet be established. Figures are planning capacities, not planning permissions or completed homes.

Two important provisional splits: BX14 Broadoak Lane (35) is divided 17/18 between Kewhurst and St Stephen's. BX43 Worsham Farm East (354) is divided 177/177 between Old Town and Worsham and Pebsham and St Michael's; the wider planning application is recorded as covering both wards. The actual dwelling locations could lead to different ward totals.

Detailed site allocations, grouped by ward

Site policy and page numbers follow the original RDC Part 2 report. The "Bexhill p." column points to the 162-page standalone Bexhill PDF (which includes a new cover). Every original individual allocation is included, including zero-housing employment sites.

CENTRAL | 341 homes · approx. 818 residents

RDC ref	Site / street location	Homes	RDC p.	Bexhill p.	Other uses / facilities (site-wide)
BX5	**Land south-east of Beeching Road** Street/application match	**200**	31	20	Commercial/retail or other employment uses (subject to demand); possible medical centre, community hub and public car parking.
BX6	**Land adjacent to Bexhill Town Hall** Street/application match	**36**	35	24	Town Hall and Amherst Road offices retained. Housing comprises 8 villa conversions and 28 apartments in a new residential building.
BX7	**Sainsbury's site, 1 Buckhurst Place** Street/application match	**75**	37	26	Existing supermarket retained; separate small retail units fronting Town Hall Square.

RDC ref	Site / street location	Homes	RDC p.	Bexhill p.	Other uses / facilities (site-wide)
BX9	**Land south of Terminus Road** Street/application match	**14**	42	31	None separately allocated.
BX11	**Rear of 11 Endwell Road** Street/application match	**6**	47	36	None separately allocated.
BX12	**Eversley Road Car Park, Eversley Road** Street/application match	**10**	49	38	Retain public car parking (approximately 10 spaces).
Central — baseline subtotal		**341**			

COLLINGTON | 0 homes · approx. 0 residents

No separate BX5–BX47 site allocation identified for this ward in the October 2026 Plan. This does not imply that there are no other extant permissions, windfall proposals, or infrastructure impacts.

KEWHURST | 25 homes · approx. 60 residents

RDC ref	Site / street location	Homes	RDC p.	Bexhill p.	Other uses / facilities (site-wide)
BX13	**Land at Broad Oak Park** Area-based assignment	**8**	53	42	None separately allocated; historic farmstead character to be retained.
BX14	**Land north of Broadoak Lane** Provisional 50:50 split	**17†**	55	44	None separately allocated.

RDC ref	Site / street location	Homes	RDC p.	Bexhill p.	Other uses / facilities (site-wide)
Kewhurst — baseline subtotal		**25**			

OLD TOWN AND WORSHAM | 243 homes · approx. 583 residents

RDC ref	Site / street location	Homes	RDC p.	Bexhill p.	Other uses / facilities (site-wide)
BX43	**Land at Worsham Farm (East)** Provisional 50:50 split	**177†**	162	151	Site-wide BX43 provisions (count once, not once per ward): Up to two-form-entry primary school with early years nursery; 3 sports pitches, pavilion/parking; community building; open space.
BX44	**Land at Worsham Farm (West)** Street/application match	**66**	165	154	c. 540 m² retail floorspace, proposed as local shop(s) with apartments above.
BX45	**Plot 7, Bexhill Enterprise Park, Mount View Street** Area-based assignment	**0**	167	156	Employment-only site: c. 26,000 m² employment floorspace (Classes E(g), B2 or B8).
BX46	**Bexhill Enterprise Park - Escarpment Site B, Glovers End** Area-based assignment	**0**	170	159	Employment-only site: c. 5,800 m² employment floorspace (Classes E(g), B2 or B8).
BX47	**Land west of Bexhill Innovation Park, Glovers End** Area-based assignment	**0**	172	161	Employment-only site: c. 6,400 m² employment floorspace (Classes E(g), B2 or B8).
Old Town and Worsham — baseline subtotal		**243**			

PEBSHAM AND ST MICHAEL'S | 177 homes · approx. 425 residents

RDC ref	Site / street location	Homes	RDC p.	Bexhill p.	Other uses / facilities (site-wide)
BX43	**Land at Worsham Farm (East)** Provisional 50:50 split	**177†**	162	151	Site-wide BX43 provisions (count once, not once per ward): Up to two-form-entry primary school with early years nursery; 3 sports pitches, pavilion/parking; community building; open space.
Pebsham and St Michael's — baseline subtotal		**177**			

SACKVILLE | 8 homes · approx. 19 residents

RDC ref	Site / street location	Homes	RDC p.	Bexhill p.	Other uses / facilities (site-wide)
BX10	**Land at 30 Dorset Road** Street/application match	**8**	45	34	None separately allocated.
Sackville — baseline subtotal		**8**			

SIDLEY | 1,623 homes · approx. 3,895 residents

RDC ref	Site / street location	Homes	RDC p.	Bexhill p.	Other uses / facilities (site-wide)
BX28	**Land at Kiteye Farm** Street/application match	**300**	115	104	At least 2.64 hectares of open space, including outdoor sports facilities.

RDC ref	Site / street location	Homes	RDC p.	Bexhill p.	Other uses / facilities (site-wide)
BX29	**Land west of Watermill Lane (south)** Street/application match	**130**	118	107	None separately allocated.
BX30	**Land west of Watermill Lane** Street/application match	**80**	120	109	None separately allocated.
BX31	**Land east of Watermill Lane** Street/application match	**170**	124	113	Public open space and landscaping.
BX32	**Land at Levetts Wood and Oaktree Farm** Area-based assignment	**0**	127	116	Employment-only site: c. 38,000 m² employment floorspace (Classes E(g), B2 or B8).
BX33	**Land north of Haven Brook Avenue (east)** Area-based assignment	**230**	130	119	Community uses; public open space and children's play space.
BX34	**Land north of Haven Brook Avenue (west)** Area-based assignment	**100**	136	125	None separately allocated; contributes to shared North Bexhill infrastructure.
BX35	**Land west of Ninfield Road roundabout** Area-based assignment	**80**	139	128	None separately allocated; contributes to shared North Bexhill infrastructure.
BX36	**Land west of Ninfield Road** Area-based assignment	**400**	142	131	Retail/community building (convenience shop and separate meeting space); mobility hub; open space, play space and possible outdoor sports.

RDC ref	Site / street location	Homes	RDC p.	Bexhill p.	Other uses / facilities (site-wide)
BX37	**Land at St Francis Farm, Ninfield Road** Area-based assignment	**70**	147	136	None separately allocated.
BX38	**Land at Freezeland Farm, Freezeland Lane** Street/application match	**5**	151	140	None separately allocated.
BX39	**Former Sidley Sports Ground, Glovers Lane** Street/application match	**50**	153	142	Replacement 3G sports pitch and associated facilities at an alternative site required before occupation; other sports/social-club reprovision considerations apply.
BX42	**Our Lady of the Rosary Church, Southlands Road** Street/application match	**8**	160	149	Existing church/hall site proposed for residential redevelopment; no new separate community facility specified.
Sidley — baseline subtotal		**1,623**			

ST MARK'S | 1,913 homes · approx. 4,591 residents

RDC ref	Site / street location	Homes	RDC p.	Bexhill p.	Other uses / facilities (site-wide)
BX16	**Gorses Car Park and Open Space, The Gorses** Street/application match	**10**	65	54	Existing public open space to be protected, or equivalent replacement secured if any loss occurs.

RDC ref	Site / street location	Homes	RDC p.	Bexhill p.	Other uses / facilities (site-wide)
BX17	**Land off Spindlewood Drive** Street/application match	**146**	68	57	Children's play areas (LEAP and LAP); no separate non-residential building specified.
BX18	**Land north of Barnhorn Manor Caravan Park** Street/application match	**20**	72	61	None separately allocated.
BX19	**Land south of Barnhorn Road** Street/application match	**400**	75	64	Employment uses (Class E(g)/B8) or commercial/tourism uses including possible accommodation; community uses, open space and possible sports provision.
BX20	**Land north of Rosewood Park** Area-based assignment	**340**	82	71	Central retail/community facilities (Classes E/F), including convenience retail; open space and play facilities.
BX21	**Land east of Sandhurst Lane** Street/application match	**68**	86	75	None separately allocated.
BX22	**Land at Barnhorn Green** Street/application match	**5–10 optional**	89	78	Medical centre and c. 2,025 m² employment floorspace (Classes E(g)/B8); alternative employment/residential mix may include 5-10 homes. See note 2.
BX23	**Land south of Sandhurst Lane, Bexhill** Street/application match	**25**	92	81	None separately allocated.
BX24	**Beeches Farm and land north of Barnhorn Road** Area-based assignment	**540**	94	83	New one-form-entry primary school with early years nursery; small Class E units (shop/workshops/light industry); community open space and possible sports provision.

RDC ref	Site / street location	Homes	RDC p.	Bexhill p.	Other uses / facilities (site-wide)
BX25	**Land at Northeye and adjoining land** Area-based assignment	**364**	100	89	Community uses, potentially including outdoor sports facilities and formal playing pitches.
St Mark's — baseline subtotal		**1,913**			Plus up to 10 homes under BX22 alternative.

ST STEPHEN'S | 134 homes · approx. 322 residents

RDC ref	Site / street location	Homes	RDC p.	Bexhill p.	Other uses / facilities (site-wide)
BX8	**Former Bexhill High School site, Down Road** Street/application match	**80**	40	29	None separately allocated.
BX14	**Land north of Broadoak Lane** Provisional 50:50 split	**18†**	55	44	None separately allocated.
BX40	**Land adjacent to 276 Turkey Road, Bexhill** Street/application match	**30**	155	144	None separately allocated.
BX41	**Cemetery Lodge, 250 Turkey Road, Bexhill** Street/application match	**6**	158	147	Existing lodge to be converted and extended for affordable housing; no separate non-housing building specified.
St Stephen's — baseline subtotal		**134**			

Verification notes and methodology

1. Ward boundaries. The nine Bexhill Town Council wards follow the Rother electoral ward arrangement. RDC's published ward-boundary map, individual application ward descriptions and nearby street postcodes have been used as geographic evidence. This is not yet a dwelling-plot-level GIS intersection.

2. Worsham Farm. The Town Council listed application RR/2023/1462/P (wider Worsham Farm scheme) as involving BOTH Old Town & Worsham and Pebsham & St Michael's wards. Another application, RR/2023/589/P, described east-of-Worsham-Lane phases in Pebsham & St Michael's. BX44 fronts Mount View Street, in Old Town & Worsham. Because the 354 BX43 dwelling positions are not shown by ward, BX43 is divided 177/177 provisionally; BX44's 66 are assigned to Old Town & Worsham. No additional second school or sports facilities should be inferred from the repeated BX43 line.

3. Broadoak Lane. Nearby Broadoak Lane addresses fall within Kewhurst, but the allocation north of the lane may approach an electoral boundary. BX14's 35 homes are therefore divided 17 Kewhurst / 18 St Stephen's for this working register. The eventual split may not be equal.

4. Turkey Road / Sidley. BX40 (adjacent to 276 Turkey Road) and BX41 (Cemetery Lodge, 250 Turkey Road) are placed in St Stephen's on the basis of local ward-specific planning records. BX42 (Our Lady of the Rosary, Southlands Road) is placed in Sidley. These three policies change ward subtotals compared with the earlier rough North Bexhill grouping.

5. Larger site boundaries. Sites in West Bexhill, North Bexhill, the Enterprise Park and Worsham can be large or adjacent to ward edges. A site's access road or postal address alone cannot demonstrate where every house will stand. RDC should be asked for proposed dwelling footprints in GIS form before publishing these totals as definitive.

6. Employment-only allocations. BX32 and BX45–BX47 have zero housing capacity but are included because their employment buildings affect transport and local infrastructure demand. They are not added to the housing total.

7. Conditional BX22. The Barnhorn Green site is principally medical/employment-led; 5–10 homes are an alternative policy option, not part of the 4,464 baseline. St Mark's rises from 1,913 to 1,918–1,923 if that option is delivered; the Bexhill maximum rises to 4,474.

8. Policy status. All figures relate to the October 2026 Regulation 19 draft. They indicate potential capacity, not guaranteed construction, completion dates or actual numbers of residents. Ward estimates should not be used as sole evidence to quantify school or GP capacity.

Source documents and ward checks

Rother District Council, Local Plan Regulation 19, Part 2, Chapter 10 (2026). https://rother.oc2.uk/document/186

Rother District Council, Bexhill electoral ward map. https://rdcpublic.blob.core.windows.net/website-uploads/2020/03/Bexhill-Wards-Map.pdf

Bexhill Town Council, Planning Committee minutes 26 July 2023: Worsham Farm in two wards (RR/2023/1462/P). https://www.bexhilltowncouncil.gov.uk/shared/attachments.asp?f=7a12ca29-a2d0-43b7-b4d5-12b4e73b5428.pdf&o=230726-Planning-July-Committee-Draft-Minutes.pdf

Bexhill Town Council, Planning minutes 19 April 2023: Worsham eastern phases, Pebsham & St Michael's. https://www.bexhilltowncouncil.gov.uk/shared/attachments.asp?f=0872e5e0-1584-4207-9613-a43f7cc8688f.pdf&o=230419-Planning-Minutes-April-23-FV.pdf

Bexhill Town Council, Planning agenda May 2024: Broadoak Lane reference in Kewhurst. https://www.bexhilltowncouncil.gov.uk/shared/attachments.asp?f=8d212d87-4d31-4812-b4f3-9f1c13b8fba4.pdf&o=240515-Planning-Committee-Agenda-May-2024.pdf

Bexhill Town Council, Planning minutes November 2022: Freezeland Farm in Sidley. https://www.bexhilltowncouncil.gov.uk/shared/attachments.asp?f=a0199b65-0230-443d-880a-7d414f3692ee.pdf&o=221123-Planning-Committee-Nov-DRAFT-MINS-FINAL.pdf

APPENDIX B | QUESTIONS TO ROTHER DISTRICT COUNCIL

The following questions arise from the four areas of research presented in the separate Main Report: Flooding, Insurance Risk, Infrastructure Requirements and Northeye Asbestos Risk. They are reproduced here in full so that the Executive Summary can be read and circulated independently.

The identical 51 questions also appear in Section 5 of the Main Report. There, each question is accompanied by references to the relevant numbered sections of the detailed analysis and supporting evidence. These detailed cross-references are omitted from this appendix for ease of reading.

The questions seek clarification, documentary evidence and, where appropriate, commitments from Rother District Council and other responsible authorities. They do not imply that every identified risk necessarily makes an allocation unsuitable. Wherever possible, replies should identify the evidence, responsible body, funding status, delivery timetable and any outstanding investigations.

PART ONE — FLOODING (F1–F12)

F1 Complete flood-risk mapping. Will RDC provide detailed mapping for every proposed Bexhill housing allocation, showing the precise extent of Flood Zones 2, 3a and 3b, surface-water flooding, groundwater risks, culverts, watercourses and areas affected by future climate-change projections?

F2 Actual developable land. What proportion of each development allocation can safely accommodate houses, roads, gardens and essential infrastructure once flood-prone land, watercourses, protective buffers and drainage areas have been excluded?

F3 Independent flood-risk assessments. Have independent, site-specific Flood Risk Assessments been undertaken for the 12 allocations identified in our preliminary review as requiring high-priority scrutiny? Will RDC publish the results and identify outstanding investigations? The relevant allocations are BX5, BX9, BX17, BX19, BX20, BX25, BX28, BX29, BX30, BX31, BX33 and BX43.

F4 Sequential and Exception Tests. Can RDC provide the completed Sequential Test and, where applicable, Exception Test evidence for these allocations, together with the justification for selecting sites containing flood-risk constraints rather than reasonably available lower-risk alternatives?

F5 Groundwater levels. What actual groundwater investigations have been undertaken, particularly at Northeye, Barnhorn Road, Rosewood Park, Beeches Farm, Worsham Farm and developments adjoining the Combe Haven corridor? Do these include seasonal measurements during wet winters and dry summers?

F6 Climate change and rising sea levels. How have projected sea-level rise, more intense rainfall, groundwater changes and future coastal conditions been incorporated into the assessment of residential development over its expected lifetime, rather than merely to the Local Plan's end date of 2042?

F7 Existing drainage failures. What remedial action has been completed following earlier flooding investigations involving Turkey Road, London Road, Westcourt Road and other established Bexhill flooding locations? Can RDC obtain dated confirmation from East Sussex County Council, Southern Water and other relevant authorities?

F8 Culverts and watercourses. Where existing streams pass through culverts beneath or adjoining proposed development sites, have their structural condition, hydraulic capacity, maintenance responsibilities and susceptibility to blockage been assessed? Which improvements are required before development can proceed?

F9 Cumulative flooding. Have the combined drainage effects of all the proposed developments been modelled across the Combe Haven, Watermill Stream, Picknell Green Stream, Worsham and Pevensey Levels catchments, including effects on neighbouring existing properties?

F10 Flood mitigation and displacement. Where developers propose raising land or finished floor levels, creating flood-storage areas or installing sustainable drainage systems, how will RDC establish that floodwater is not simply displaced onto adjoining land or existing residential properties?

F11 Long-term drainage maintenance. Who will own, maintain, inspect and finance the sustainable drainage systems, attenuation ponds, culverts and associated flood infrastructure after completion? What enforceable arrangements will ensure their continuing effectiveness?

F12 Development phasing and housing numbers. Where investigations demonstrate that satisfactory flood protection, safe access, drainage capacity or an acceptable development layout cannot be achieved, will RDC reconsider the number of dwellings allocated, their location or the permitted phasing of construction and occupation?

PART TWO — INSURANCE RISK (I1–I8)

I1 Evidence of future insurability. What independent assurance has RDC obtained that dwellings proposed within identified flood-sensitive locations will be capable of obtaining appropriate buildings insurance, including flood cover, at commercially affordable premiums?

I2 Exclusion from Flood Re. Given that newly constructed dwellings completed on or after 1 January 2009 are ineligible for Flood Re, what consideration has RDC given to the insurance implications for purchasers of proposed properties in areas with significant flood or drainage constraints?

I3 Premiums, excesses and exclusions. Has RDC consulted insurers, insurance brokers or relevant industry organisations concerning indicative premiums, policy excesses, exclusions from flood cover and the possibility of refusal of insurance for properties within the more flood-sensitive allocations?

I4 Effectiveness of engineering mitigation. What evidence demonstrates that insurers will recognise developers' proposed flood-mitigation measures, including raised ground levels, drainage installations and flood-storage facilities, as sufficiently reducing the risk to permit affordable insurance?

I5 Mortgage availability. Has RDC considered whether restrictions on obtaining comprehensive buildings insurance could affect mortgage lending, property valuations, resale opportunities and the long-term financial security of purchasers?

I6 Future climate-related insurance risk. How will RDC assess the possibility that properties initially considered insurable may become increasingly expensive or difficult to insure as flood-risk assessments and climatic conditions change over subsequent decades?

I7 Information provided to purchasers. Will RDC seek appropriate arrangements to ensure that future purchasers are informed of material flood risks, residual risks following mitigation, relevant insurance limitations and any continuing property-owner responsibilities for flood-protection measures?

I8 Consequences for development viability. If independent insurance evidence indicates that appropriate flood cover may be unavailable or prohibitively expensive for a proposed residential development, will RDC reconsider the suitability, density, layout or phasing of the relevant housing allocation?

PART THREE — INFRASTRUCTURE REQUIREMENTS (IN1–IN19)

IN1 Overall development and population calculations. Will RDC confirm the intended delivery programme for the 4,464 baseline allocated homes, together with the potential additional 5–10 homes at Barnhorn Green, and provide a site-by-site schedule of expected completions through 2042? Will the programme distinguish between new residents, existing Bexhill residents relocating within the town and net population growth?

IN2 Infrastructure Delivery Programme. Will RDC publish a comprehensive, costed Bexhill infrastructure delivery programme identifying each essential project, its funding source, responsible organisation, implementation date and relationship to individual housing allocations?

IN3 Roads and traffic capacity. Has RDC undertaken cumulative traffic modelling covering the complete housing and employment development programme, including the A259, Little Common roundabout, A269, Ninfield Road, Watermill Lane, Haven Brook Avenue and principal town-centre junctions? Will the results, proposed highway improvements and delivery dates be published?

IN4 West Bexhill transport strategy. Given that a western bypass is not anticipated within the Plan period, what evidence demonstrates that existing roads, together with proposed improvements, can accommodate development in St Mark's and adjoining western Bexhill without unacceptable congestion or road-safety problems?

IN5 Walking, cycling and accessibility. What fully funded provision will be made for safe footpaths, pedestrian crossings, cycle routes, wheelchair access and connections between new developments, schools, shops, medical centres, railway stations and existing communities? Will necessary off-site links be completed before substantial residential occupation?

IN6 Public transport. What additional bus services are planned for West Bexhill, North Bexhill and the Haven Brook Avenue corridor? Which operators will provide them, at what frequency, and what funding arrangements will guarantee their operation beyond any initial developer subsidy?

IN7 Primary schools and nurseries. What are the confirmed locations, pupil capacities, construction costs, funding arrangements and expected opening dates for the proposed primary-school and nursery provision at Worsham Farm, West Bexhill and North Bexhill?

IN8 Secondary education and special educational needs. Have school-place forecasts been extended to 2042 and adjusted for the anticipated number, size and occupancy of new dwellings? What provision is planned for secondary education, special educational needs and disabilities (SEND), and additional nursery and childcare demand?

IN9 Healthcare provision. What are the confirmed funding and delivery arrangements for the proposed medical facilities at Beeching Road and Barnhorn Green? Has NHS Sussex committed to sufficient clinical staff, premises, equipment and operating expenditure to meet the additional demand? What provision is anticipated for dentistry, pharmacies and community healthcare?

IN10 Adult social care. What assessment has been undertaken of the additional demand for residential and nursing care, domiciliary care, disability support and associated transport services, taking into account Bexhill's existing older population and the likely age profile of future residents?

IN11 Water supply and wastewater treatment. Have Southern Water and South East Water confirmed that water supplies, foul sewers, pumping stations and treatment works can accommodate the cumulative development proposed? Which network improvements must be completed before additional homes may be occupied?

IN12 Electricity and communications. What assessments have been undertaken of additional electricity demand from housing, employment development, electric vehicles and heat pumps? Have network operators confirmed the necessary capacity, reinforcement programmes and delivery dates? What arrangements are proposed for broadband, mobile connectivity and accessible electric-vehicle charging?

IN13 Emergency services. Have Sussex Police, East Sussex Fire and Rescue Service and South East Coast Ambulance Service been consulted on the cumulative effects of development? What additional staffing, equipment, premises, emergency access arrangements or other resources have they identified as necessary?

IN14 Community facilities, sport and recreation. What guarantees exist for the delivery, funding and long-term maintenance of the community buildings, playing fields, sports pitches and recreational facilities included in the development proposals? In particular, will replacement sports provision at Sidley and the proposed Worsham facilities be completed and available at the required stages of development?

IN15 Green infrastructure and environmental protection. How will RDC ensure that the expansion of residential and commercial development does not cause unacceptable damage to ancient woodland, the Combe Haven corridor, Pevensey Levels habitats or other important ecological areas? What independently assessed protective buffers, monitoring systems and long-term management arrangements will be required?

IN16 Geological and palaeontological protection. Will RDC require a specific Geological and Palaeontological Impact Assessment in connection with Policy BX36 and development close to Ashdown Brickworks, taking account of the scientific importance of the fossil-bearing deposits and the need to protect continuing geological investigations?

IN17 Developer contributions and viability. What financial contributions towards roads, schools, healthcare, drainage, affordable housing and community facilities are expected from developers? Where developers subsequently claim that agreed contributions make schemes financially unviable, what independent scrutiny, review mechanisms and safeguards will prevent essential infrastructure or affordable housing from being disproportionately reduced?

IN18 Infrastructure before occupation. What legally enforceable planning conditions, Section 106 agreements, Section 278 agreements or other mechanisms will ensure that essential services and infrastructure are operational before the relevant housing-occupation thresholds are reached? How will RDC respond where necessary infrastructure is delayed, underfunded or undeliverable?

IN19 Evidence and policy consistency. Will RDC reconcile discrepancies between site-allocation references in the Regulation 19 Local Plan and the September 2026 Infrastructure Delivery Plan, including references to the Worsham school, Beeches Farm school and Barnhorn Green medical centre? Can RDC provide one agreed, updated schedule linking each infrastructure project to the correct allocation policy?

PART FOUR — NORTHEYE ASBESTOS RISK (N1–N12)

N1 Publication of contamination evidence. Will RDC obtain and make available the existing geo-environmental, contamination and technical investigations of Northeye, including the studies commissioned before the Home Office acquired the site in 2023? Which recommendations for supplementary investigations have been completed, and which remain outstanding?

N2 Comprehensive asbestos survey. Has a comprehensive asbestos survey been completed covering all remaining buildings, demolition materials, buried waste and potentially contaminated ground? Does the evidence identify the type, location, quantity, condition and likely disturbance risk of asbestos-containing materials?

N3 Ground contamination. What intrusive ground investigations have established the horizontal and vertical extent of asbestos and any other contaminants? Have soils, made ground, former building foundations, demolition deposits and areas affected by historic site operations all been examined?

N4 Historical disturbances. What consideration has been given to the history of construction, refurbishment, demolition and the major prison fire of April 1986 in identifying areas where asbestos-containing materials may have been damaged, disturbed, buried or dispersed? Will RDC seek relevant historical surveys and records from Homes England and government departments?

N5 Groundwater and watercourse contamination. Have investigations established whether contaminants could be mobilised through groundwater, surface-water drainage or flooding, including any potential pathways towards the East Stream and neighbouring drainage networks? What environmental protection and monitoring measures are proposed where such pathways exist?

N6 Demolition and asbestos removal. What detailed demolition and asbestos-removal strategy is proposed, including contractor competence, regulatory notifications, dust suppression, air monitoring, waste containment and disposal at appropriately authorised facilities?

N7 Protection of neighbouring residents. What measures will be required to protect neighbouring households, businesses, road users and the local environment from asbestos fibres and contaminated dust during site clearance, excavation and construction? Will the monitoring results be independently reviewed and made publicly available?

N8 Remediation costs and responsibility. What is the latest independently supported estimate of the total cost of demolition, asbestos removal, ground remediation, environmental monitoring and final site certification? Which organisation or landowner will meet those costs, and how will RDC establish that sufficient funding is available before residential development proceeds?

N9 Independent verification of completed remediation. What independent procedures will verify that remediation has achieved the standard necessary for the proposed residential use, including private gardens and children's play areas? Which regulatory bodies will review the results, and will the validation reports be published before the affected land is occupied?

N10 Residual contamination and future monitoring. If any contamination is proposed to remain safely managed beneath buildings, roads or landscaped areas, what long-term restrictions, inspection arrangements, maintenance obligations and disclosure requirements will protect future residents and property owners?

N11 Reconciliation of proposed housing numbers. How does RDC reconcile the 364 dwellings allocated under Policy BX25 with Homes England's emerging proposal for up to 250 homes? Can RDC provide a definitive map separating Homes England's land from the adjoining privately owned parcels, together with the proposed dwelling capacity and remediation responsibilities for each?

N12 Development feasibility and future planning decisions. Before confirming the final residential capacity at Northeye, will RDC require evidence demonstrating that the site can be safely remediated, that remediation is financially deliverable, and that the proposed housing, access, drainage and infrastructure can be provided without unacceptable residual risks? If these conditions cannot be demonstrated, will RDC reconsider the allocation's capacity, layout or delivery timetable?

GENERAL REQUEST APPLYING TO ALL FOUR SECTIONS

The Town Council requests that RDC distinguish clearly between measures already completed, measures with secured funding and binding delivery commitments, and proposals that remain dependent upon future investigation, funding or agreement. Where the relevant evidence is held by another organisation, RDC is requested to identify that organisation and, where appropriate, obtain or coordinate the necessary response.

The purpose of these questions is to establish whether the proposed allocations are supported by sufficiently robust evidence and whether their safe and sustainable delivery can reasonably be demonstrated.

TOWN COUNCIL REVIEW OF ROTHER LOCAL PLAN 2025–2042

Bexhill-on-Sea
Main Report

This Main Report has an Executive Summary that is provided as a separate document. This Report is divided into four key review sections:

Flooding • Insurance Risk • Infrastructure Requirements • Northeye Asbestos

There is also an evidence review and a list of questions for Rother District Council

Prepared for the Town Clerk, Bexhill-on-Sea Town Council by

David EP Dennis

Bexhill Town Council Environmental Projects Manager

20 October 2026 | 07969 088186

Report structure

1 Flooding and drainage

2 Insurance risk and financial implications

3 Infrastructure requirements and delivery

4 Northeye: asbestos and contaminated-land risk

5 Questions to Rother District Council, cross-referenced

6 Conclusions

Appendices:

Northeye Asbestos – HMP Occupation

Northeye Asbestos – UAE Occupation

Bexhill History and Heritage Conservation

Bexhill Wildlife Conservation

Main Report Sources and evidence notes.

Linking statement

This report provides the detailed research, evidence and analysis supporting the findings presented in the accompanying Executive Summary. It examines the implications of Rother District Council's proposed Local Plan for Bexhill-on-Sea, concentrating on four matters of particular importance to the town and its future residents: flooding, insurance risk, infrastructure requirements and asbestos contamination at the former Northeye site.

The assessment considers both individual development allocations and their cumulative effects upon existing communities. It distinguishes between infrastructure already delivered, measures for which funding and implementation commitments exist, and proposals whose feasibility or delivery remains to be demonstrated. It also identifies matters requiring clarification from Rother District Council and other responsible authorities.

The report concludes with a consolidated series of questions, cross-referenced to the relevant sections, and an assessment of the principal issues requiring resolution before the proposed scale of development can be considered demonstrably safe, sustainable and deliverable.

Scope, evidence and limitations

The Regulation 19 Local Plan is a proposed submission document, not an adopted plan. This is a research assessment for the Town Council, not a substitute for a site-specific flood-risk assessment, engineering design, actuarial insurance quotation, contamination investigation or binding infrastructure-delivery agreement. The conclusions are therefore differentiated between documented planning facts, provisional research screening and points that need technical confirmation. [1–4]

Indicative measure	Research position / qualification
Bexhill housing allocation capacity	4,464 principal-site dwellings; another 5–10 may be possible under the alternative BX22 scheme. RDC displays 4,474 as the upper total.
Potential residents	c. 10,740 persons at an illustrative 2.4 per maximum dwelling; not a firm forecast of net population growth.
Ward concentration	Sidley 1,623; St Mark's 1,913; together 3,536 or c. 79% of the 4,464 baseline. Ward GIS split provisional.
Housing-allocation land	c. 2.33 km² of site boundaries, equivalent to c. 7.22% of a reported 32.31 km² parish. Not the impermeable/building footprint; map comparison provisional.
Flood-screening priority	12 HIGH, 17 MEDIUM, 7 LOW housing/potential housing allocations. Priority labels, not property flood or insurance ratings.
Employment as well as housing	c. 78,225 m² allocated employment floorspace; traffic, utility and service assessments must include it.

Method: policy capacities and site constraints are derived from the October 2026 Part 2 allocation chapter and the accompanying Town Council screening registers. Ward and land-area percentages require spatial verification. [1, 3, 4]

1. Flooding and drainage

1.1 The relevant planning and technical tests

Parts of Bexhill-on-Sea are prone to flooding. Flood risk cannot be assessed by looking solely at an Environment Agency river-flood map. Planning decisions must consider flood sources, future climate effects, drainage and residual risk, safe access and the impact on other land. The September 2026 National Planning Policy Framework includes a sequential approach to allocating land and, where required, an Exception Test; it also expects development to remain safe for its lifetime without increasing flood risk elsewhere. RDC's policies ENV1–ENV4 cover flooding, water quality, surface-water drainage and foul-water drainage. [1, 2, 5]

The central distinction is between a flood constraint somewhere within an allocation boundary and the actual position of proposed homes, schools, roads and critical services. Neither the number of houses exposed to flooding nor the area of land actually inundated has yet been calculated in this preliminary review. Therefore, mapping the whole site, the building plots, access routes and river corridors on consistent GIS layers is indispensable.

1.2 Provisional allocation-level risk screening

Of 36 housing or potential-housing allocations reviewed, 12 have been designated HIGH priority for further flood scrutiny, 17 MEDIUM and seven LOW. These are priorities for evidence-gathering, not official Flood Zones or judgments that an allocation is undeliverable. The HIGH group accounts for 2,728 proposed dwellings across entire site boundaries; it does not mean that 2,728 dwellings would themselves flood. [3]

Policy / site	Capacity	Principal evidence issue
BX5 · Beeching Road	200	Two culverts and substantial surface-water constraints.
BX9 · Terminus Road	14	Culverts and western surface-water ponding.
BX17 · Spindlewood Drive	146	Flood Zones 2/3 and surface-water pathways.
BX19 · South Barnhorn Road	400	Flood Zones 2/3, drainage and sewer-capacity sensitivity.
BX20 · North Rosewood Park	340	Flood Zones 2/3, surface-water flows; sewer capacity needs proof.
BX25 · Northeye and land	364	Floodplain grazing marsh (north-west), ordinary watercourse; groundwater evidence.
BX28 · Kiteye Farm	300	Combe Haven floodplain and surface-water corridors.
BX29 · W. Watermill Lane (S)	130	Flood Zones 2/3 and surface-water constraints.
BX30 · W. Watermill Lane	80	Southern floodplain and boundary flow routes.
BX31 · E. Watermill Lane	170	Combe Haven through southern part of allocation.
BX33 · Haven Brook Ave (E)	≤230	Floodplain/no-build areas; show feasible plot and access layout.

Policy / site	Capacity	Principal evidence issue
BX43 · Worsham Farm (E)	354	Southern Flood Zones 2/3; assess existing consents and phasing.

HIGH priority register, from Town Council's flood screening of RDC's Regulation 19 allocations. Site capacities refer to entire site allocations; some sites explicitly exclude building in the mapped flood areas. [1, 3]

The MEDIUM group includes, among others, Beeches Farm (BX24; c. 540 homes), land west of Ninfield Road (BX36; c. 400), the former High School (BX8), the former Sidley Sports Ground (BX39), sites at Turkey Road (BX40–41) and Worsham Farm West (BX44). Targeted evidence is needed on local surface-water flow, the adequacy of proposed SuDS, safe access and effects on neighbouring land. The LOW label merely indicates that the allocation wording identifies fewer specific concerns; it is not a certificate of safety. [3]

The combined site boundaries of 11 housing allocations that contain at least some mapped Flood Zone 2 or 3 land amount provisionally to approximately 1.472 million m². This measures the total boundaries of those sites, not the floodplain within them. A defensible estimate of flood-exposed land or properties requires GIS overlays using the actual proposed layouts. [3, 4]

1.3 Existing flooding and legacy drainage constraints

Bexhill has a documented history of local surface-water flooding. The 2016 East Sussex Surface Water Management Plan records incidents in or around Turkey Road, Westcourt Drive, Sutherland Avenue, Peartree Lane and De La Warr Parade, including concerns about sedimented ditches, blocked culverts and outfalls. The 2026 Level 1 Strategic Flood Risk Assessment identifies historic sensitivity around London Road, Westcourt Road, Dorset Road and Little Common Road. Such reports are evidence of catchment weaknesses; they do not prove a particular proposed plot is currently flooded. [3, 6, 7]

The Town Council has not yet obtained an up-to-date audit showing which historical recommendations were implemented, which assets were subsequently inspected, and what hydraulic headroom remains. This matters not only for prospective homes but for existing homes downstream. Councillors should request dated inspection records, maintenance responsibilities, CCTV surveys, as-built records and evidence of completed repairs, not merely general assurances that issues have been addressed.

1.4 Groundwater, floodplain capacity, sea-level change and climate

Where land adjoins grazing marsh, watercourses, ponds or a high-water-table landscape, national groundwater mapping is a screening tool rather than a site investigation. Groundwater can fluctuate seasonally or remain elevated after prolonged winter rainfall; it can affect infiltration drainage, foundation designs and whether new attenuation systems operate as designed. Relevant sites include Northeye, West Bexhill, Worsham and the Combe Haven corridor. Representative borehole monitoring through wet and dry periods may be necessary before the engineering assumptions are settled. [3, 7]

The coastal defence programme around Pevensey Bay is a separate, important protection measure. 'Hold the line' shingle management and prospective works do not resolve inland surface-water, groundwater, culvert or foul-sewer problems. Building safety should be evaluated for the expected life of the development, not simply the Local Plan period ending in 2042. [2, 8]

1.5 Cumulative catchment effects and mitigation

New development changes the timing and volume of runoff; several developments in one receiving catchment can compound downstream constraints. Of particular relevance are Combe Haven, Watermill Stream, Picknell Green Stream and receiving watercourses associated with the Pevensey Levels. The technical evidence should model the complete development programme, saturated catchments, extreme rainfall, exceedance routes and the interaction with sewer networks. [3, 5]

Raising site levels or finished floors can protect new buildings, but may redirect water elsewhere. Sustainable drainage systems need land, outfall capacity, any appropriate water-quality treatment, inspection, an adopting body, long-term maintenance finance and safe overflow routes. Coastal defences, storm-overflow improvements and SuDS should not be treated as interchangeable: each addresses different mechanisms. [3, 5]

A robust development decision should be supported by site-by-site and cumulative, climate-adjusted models, evidence of safe routes and no unacceptable off-site increases in flooding. Where that cannot be demonstrated, RDC should revisit developable footprints, site densities and the timing of occupation. Existing consents, particularly for Worsham, must be examined alongside rather than ignored in the new allocation review.

Questions linked to this section: F1–F12. Flood mapping, safe developable area, groundwater, legacy drainage, cumulative effects, SuDS maintenance and phasing.

2. Insurance risk and financial implications

2.1 Planning acceptability and commercial insurance are not the same test

Granting planning permission does not oblige an insurance company to insure the completed houses. Insurers independently assess location, ground levels, drainage and protection works, flooding history, residual risk and their own loss models. A property can satisfy planning conditions yet face high premiums, large flood excesses, exclusions or restricted availability in the private insurance market. Conversely, mapped floodplain elsewhere within a large allocation is not proof that the future dwellings will be uninsurable. The Town Council should therefore ask RDC to obtain proportionate, site-specific evidence from the insurance and lending sectors before relying on flood-sensitive allocations as deliverable, reducing the risk that future purchasers may face restricted or unaffordable flood cover. [5, 9, 10]

2.2 Flood Re and why the completion date matters

Flood Re is a UK reinsurance arrangement through which participating home insurers may transfer eligible flood risks. Houses completed on or after 1 January 2009 are generally ineligible. The new dwellings contemplated by the 2025–2042 Local Plan would therefore normally depend on commercial insurance terms. This does not mean that they cannot obtain flood cover: rather, Flood Re is **not available as a backstop** to assist their pricing. [9]

2.3 Consequences for residents, lenders and the housing market

Insurance affordability is a household-budget issue and potentially a matter of mortgageability. Mortgage lenders typically require adequate buildings cover; where flood cover cannot be arranged on acceptable terms, transactions, valuations and resale prospects may become more difficult. Consequences may arise some years after purchase if insurers change their risk models or flood histories deteriorate. Accordingly, the relevant question is not simply whether a policy can be purchased on the first day of occupation, but whether the residual exposure is understood and capable of sensible management over the property's lifetime.

The report does not attribute a single insurability rating to the HIGH, MEDIUM or LOW flood-screening allocations. Those classifications were never designed to predict insurer decisions. Insurance evidence must instead be property- and layout-specific, incorporating the approved mitigation scheme and realistic long-term maintenance assumptions. [3, 10]

2.4 Bulverhythe: a useful local caution

Bulverhythe Recreation Ground occupies part of the historic floodplain of the former medieval harbour. Hastings Borough Council records frequent flooding of its lower playing fields after heavy rain. The proposed 192-home scheme (HS/FA/20/00966) met substantial local opposition, including a petition with more than 800 reported signatories. The Environment Agency objected to inadequate flood-risk assessment and hydraulic modelling. In March 2022 Hastings Borough Council withdrew the application, citing unresolved flood concerns and a Homes England funding deadline. Proposed mitigation included raised accommodation and flood-storage landscaping. The case illustrates why floodplain schemes require convincing hydraulic evidence, without establishing the insurability of any Bexhill allocation. [10, 11]

2.5 An evidence-based insurability assessment

RDC should be asked to obtain a proportionate independent assessment for dwellings on the more flood-sensitive sites: indicative availability of buildings and contents policies with flood cover; likely premiums and excesses; insurance assumptions about SuDS and land-raising works; mortgage implications; and any long-term burdens placed upon residents. Consultation with the Association of British Insurers, brokers, major insurers, lenders and relevant experts may be informative, while recognising that no one consultation can bind all private insurers.

Where credible evidence shows that a particular layout is materially exposed or difficult to insure, the planning and financial assumptions should be revisited. This is a request for reliable evidence and consumer protection, not an unsupported prediction of widespread refusal of insurance.

Questions linked to this section: I1–I8. Flood Re eligibility, market evidence, premiums and excesses, lender consequences, future risk and informed purchase.

3. Infrastructure requirements and delivery

3.1 Scale, geography and phasing

RDC's allocation list includes capacity for up to 4,474 Bexhill dwellings and approximately 78,225 m² of allocated employment floorspace. If delivered across 17 years, the maximum housing capacity would imply around 263 homes annually on a simple arithmetic basis, compared with approximately 123 annual net additions in the historical 2006/07–2024/25 monitoring exercise. Such a comparison is illustrative; site allocations are neither completions nor a fixed annual programme. [1, 4]

The provisional ward split puts 1,623 dwellings in Sidley and 1,913 in St Mark's—3,536 of the baseline 4,464. The other seven wards together account for 928. Ward assignment is not yet a dwelling-footprint GIS exercise, and journeys to schools, workplaces, doctors and public transport cross ward boundaries. It is suggested that the correct basis for infrastructure is a single town-wide, cumulative assessment with local tests in each neighbourhood. [4]

3.2 Roads, junctions, public transport and active travel

The A259/Barnhorn Road and Little Common roundabout, A269/Ninfield Road, A269/Watermill Lane, London Road/Beeching Road and internal West and North Bexhill roads are key constraints. The Local Plan does not anticipate a new western bypass within the Plan period. Some improvements have already been delivered at Little Common and London Road, but full build-out may need further measures. A development traffic study must include school trips, employment floorspace, construction vehicles, neighbouring settlements and emergency routes. [1, 12]

Policies BX15, BX26 and BX27 envisage new pedestrian and cycling links, safer routes to schools and facilities and a service along Haven Brook Avenue. These are valuable proposals, but a network line on a masterplan is not a funded and accessible route, and a suggested bus service is not a guaranteed long-term timetable. Practical evidence should specify footway and crossing design, operator, frequency, accessibility, subsidy period and opening triggers. Disabled users and families with pushchairs need continuous, safe routes—not isolated sections. [1, 12]

3.3 Schools, nurseries and special educational needs

Three geographical primary/nursery provisions feature in the proposal: Worsham Farm East BX43 (up to two forms of entry), Beeches Farm BX24 (one form of entry in the site policy) and a further North Bexhill provision tied to demand. Their viability depends on school land, sufficiently accurate pupil projections, capital and revenue funding and opening dates. RDC's September IDP identifies the need but does not, in the material reviewed, establish full delivery certainty. [1, 12]

East Sussex school data recorded spare primary capacity for a wider Bexhill planning area in 2024/25, but that cannot reliably predict the position throughout a development period ending in 2042. Catchment-level modelling should reflect the eventual house types, affordable housing, nursery uptake, SEND places, secondary-school demand, cross-boundary pupil movements and exact rates of occupation. Schools should not be represented twice where a single facility serves adjacent ward allocations. [12, 13]

3.4 Healthcare, dentistry and adult social care

The proposed Beeching Road medical centre is entered in the September IDP as HEA003 with a £10 million estimate and **no secured funding** recorded at the date of that schedule. Barnhorn Green is separately associated with a possible medical centre (HEA004), but the specification and financing need confirmation. A proposed site or building is not the same as operating NHS capacity: clinicians, consultation space, equipment and commissioning must all be provided. [1, 12]

Dentists, pharmacies, community nursing, home care, supported housing and care-worker journeys matter particularly in a town with an older population. The assessment should consider rising demand from existing residents as well as newcomers, and should avoid implying that every person occupying new housing is additional to Bexhill's population. Service providers need to give evidence of practical capacity, not simply buildings or land parcels.

3.5 Water resources, wastewater, drainage and utilities

Water provision involves different suppliers across Bexhill; Southern Water also has responsibility for foul sewerage and wastewater. The proposed West and North Bexhill growth areas depend on coordinated sewer strategies. Evidence is needed for water-supply headroom, pumping-station and sewer capacities, treatment works, hydraulic modelling, commissioned upgrades and enforceable occupation thresholds. Storm-overflow and water-quality investment, while valuable, should not be presented as proof of capacity for new foul connections. [1, 3, 12]

A comprehensive utility assessment must also cover UK Power Networks substations and feeders, electric vehicles, heat pumps, communications, refuse collections and major employment sites. EV cross-pavement charging proposals can involve separate planning, highways and safety regimes; no blanket exemption from highway permissions should be assumed without checking the applicable rules.

3.6 Emergency services, accessible neighbourhoods and recreation

Police, ambulance and fire-and-rescue capacity should be tested using realistic access and response modelling and the cumulative growth across local authority boundaries. Development must retain usable alternative access when roads are congested or flooded. Design should also accommodate refuse and emergency vehicles, hydrants and safe pedestrian crossing routes.

The allocation proposals include play provision, community meeting spaces, sports facilities and public open space. A replacement 3G pitch is required for the former Sidley Sports Ground (BX39) before the relevant housing occupation; Worsham East (BX43) proposes three pitches, pavilion and community facilities. The questions are whether facilities are actually delivered when needed, accessible and affordable to the community, and provided with secure long-term maintenance. [1, 12]

3.7 Ancient woodland, Combe Valley and geological heritage

Infrastructure includes functioning green and blue networks, not merely hard engineering. Sites around Spindlewood, Levetts Wood, Worsham, Combe Haven and the Pevensey Levels require suitable ancient woodland and habitat buffers, lighting and recreational management, protected drainage and continuing ecological monitoring. Environmental safeguards should be verified at the scale of interacting developments and their cumulative visitors, not only isolated red-line applications. [1, 12]

Policy BX36 (land west of Ninfield Road) also raises the question of coexistence with Ashdown Brickworks, whose Early Cretaceous fossil-bearing deposits are scientifically important. The policy addresses continuing mineral operations, but it is vital that the Town Council should request a proportionate geological and palaeontological impact assessment so residential encroachment does not inadvertently restrict research, quarry activity or restoration of fossil-bearing exposures. This is an international site with global science implications. A separate report on it can be provided on request. [1, 4]

3.8 The September 2026 infrastructure delivery ledger

The evidence distinguishes works completed, projects with funding recorded, future planning obligations and schemes for which deliverable specifications remain unknown. The following are indicative entries from the published September 2026 Infrastructure Delivery Plan (IDP); they require current confirmation from the delivery bodies. [12]

IDP code	Project	Recorded position / key gap
TRA005	A269 / A2036 / London Road junction	c. £800,000 initial estimate; funding not established.
TRA006	A269 / Watermill Lane junction	c. £200,000 initial estimate; further costing and funding required.
TRA007	A259 Little Common roundabout	Earlier improvements implemented; assess need for further works.
TRA009	London Road / Beeching Road corridor	£1.2m indicative; £300k CIL recorded, c. £900k gap; some works delivered in 2024.
EDU001–004	Worsham, West and North Bexhill primary/nursery; secondary expansion	Cost, capital/revenue finance, sites, opening thresholds and 2042 pupil forecast not fully established.
HEA003	Beeching Road medical centre	£10m estimated; £0 secured recorded in September 2026.
HEA004	Barnhorn Green medical centre	Specification, NHS commissioning, funding and opening unknown.
UTI047	Hastings / Bexhill storm-overflow programme	£14.4m programme; distinct from proof of all new-home foul-sewer capacity.
COM002–003	Bexhill leisure; Sidley recreation hub	£2.5m and £3.43m respectively recorded funded; verify actual 2026 completion.
COM014	Worsham football and sports facilities	Developer delivery identified; costs, timing and community access to confirm.

A practical documentary problem is that some IDP descriptions carry policy identifiers from an earlier draft. The final Regulation 19 Part 2 chapter associates the Worsham school with BX43, Beeches Farm with BX24 and Barnhorn Green with BX22; an agreed cross-reference schedule is needed. This is a citation-consistency issue, not evidence that the projects have been cancelled. [1, 12]

3.9 Ward-specific implications and enforceable delivery

Sidley / North Bexhill: The major questions are how many homes may be occupied before A269–Watermill Lane junction and foul-sewer works are commissioned, which agency will open the proposed school, and when Haven Brook Avenue buses, Combe Haven links and replacement sporting facilities will become available. Employment premises on BX32 add substantial traffic without housing units. [1, 12]

St Mark's / West Bexhill: The A259 and Little Common roundabout must be assessed against the full build-out of the 400-home BX19, 340-home BX20, 540-home BX24 and 364-home wider BX25 allocations, among others. Drainage and water quality, school delivery at Beeches Farm, medical provision at Barnhorn Green and safe routes to Little Common require integrated phasing rather than isolated site promises. [1, 12]

Other wards: Central Bexhill includes the Beeching Road site, medical-centre proposal, brownfield access and significant historic drainage constraints. Worsham and Pebsham share major land allocations and one set of proposed site-wide school and sports facilities. Smaller ward allocations still

use town-wide roads, emergency services, secondary schools and healthcare. Provisional ward splits should be verified before final spatial or financial conclusions. [4, 12]

Policy INF1 provides the foundation for insisting that necessary mitigation is secured and timed to coincide with development, including proper examination of viability-based changes and relevant review or clawback arrangements. The Council should request a single Bexhill infrastructure matrix giving each scheme's responsible provider, funding, legal mechanism, milestone and maximum justifiable number of dwellings occupied before completion. [1, 12]

Questions linked to this section: IN1–IN19. Cumulative transport and services; school, clinical and utility funding; environmental safeguards; formal phasing and developer obligations.

4. Northeye: asbestos and contaminated-land risk

4.1 Historical land uses and why they matter

The former Northeye site has a complex twentieth-century history: Royal Air Force use and post-war accommodation, operation as HMP Northeye from 1969 until 1992, a major prison fire in 1986, and subsequent technical-training use linked with the United Arab Emirates until around 2010. Different construction phases, later alterations, fire damage and possible buried demolition material mean that a reliable historical site model is important. The age of a building alone does not identify the type, amount or condition of any asbestos-containing material. [4, 14]

4.2 The Home Office acquisition and the known documentary warning

The Home Office acquired the former prison for approximately £15.4 million, completing its purchase in September 2023, intending accommodation for up to approximately 1,400 asylum seekers. Its pre-acquisition environmental investigations had identified asbestos in buildings and concerns about contaminated ground, with further intrusive work needed to establish remediation requirements. In November 2024 the National Audit Office reported shortcomings in due diligence and acquisition decisions; the scheme was not used for its original accommodation purpose. These official criticisms establish a need for rigorous investigation, not that residential redevelopment is inherently impossible. [14]

In February 2026 the Government announced transfer of the former prison to Homes England for potential housing development. The Town Council should distinguish transfer of ownership and an emerging residential concept from completed contaminant removal, independent verification or planning permission. [15]

4.3 Three separate quantities and development boundaries

An earlier adopted Plan contemplated around 140 Northeye dwellings; a later draft used 384. Current Regulation 19 Policy BX25 allocates approximately 364 homes across the former prison and adjoining land, including agricultural parcels in separate ownership. Homes England informed the Town Council in September 2026 that it was considering up to approximately 250 homes on its own land. These figures are not automatically contradictory: the 364-home allocation covers a wider ownership geography than the Homes England concept. A site-boundary plan, dwelling-yield analysis and owner-specific responsibility schedule are required before the difference can be interpreted as a reduction. [1, 4, 15]

4.4 What the risk assessment must actually demonstrate

Policy BX25 requires investigation and appropriate management of land contamination but does not expressly name asbestos. That omission from the site wording is significant as a matter of clarity, not proof that the wider ground-conditions policy excludes asbestos. A proportionate assessment should identify asbestos-containing materials in remaining structures, made ground, buried waste and disturbed soil, together with any other relevant contaminants. It should distinguish a hazardous source, a viable pathway for exposure and the people or ecosystems that could be affected. The Town Council should specifically seek evidence of controls to prevent asbestos fibres and contaminated dust escaping beyond the site boundary, including an assessment of potential risks to nearby residents, roads and adjoining land. The asbestos waste-management plan should demonstrate suitable double-wrapping or other secure packaging, lawful carriage in appropriately enclosed vehicles or containers and disposal at authorised facilities, with documentary tracking. No particular destination or universal vehicle-cover design should be assumed without evidence. [1, 16, 18]

The situation here is complex and potentially dangerous. Asbestos in a sound, undisturbed material is not the same as airborne fibres released during uncontrolled demolition or excavation. Similarly, finding contamination in soil is not proof that nearby residents have inhaled fibres. Before works, the responsible landowner or developer should commission appropriately qualified specialists to undertake the necessary surveys and a conceptual site model; the Town Council could seek independent technical review of the conclusions. During works there should be effective containment, air and dust monitoring as justified, defined stop-work triggers and clear communication with neighbours. [16, 18]

Because parts of the allocation adjoin watercourses and flood-sensitive grazing marsh, site investigations must also consider groundwater, runoff, leaching and the consequences of excavation in wet conditions. Questions about waterborne transport are different from airborne fibre risk; each requires a relevant sampling and pathway assessment rather than speculation. [1, 3, 16]

4.5 Demolition, remediation, validation and long-term stewardship

An accountable remediation strategy should quantify the materials to be removed or treated, specify safe methods and suitably qualified contractors, identify authorised waste routes, estimate costs and confirm who pays. The relevant asbestos regulations and Health and Safety Executive controls for licensable work must be followed. Where contamination is to remain safely isolated, the protective structures, future excavation restrictions and maintenance obligations must be documented. [16]

The Environment Agency's Land Contamination Risk Management guidance expects a sequenced approach: risk assessment; appraisal of remediation options; design and implementation; verification; and, where necessary, long-term monitoring. Final verification should establish that the intended residential use, including gardens and children's play areas, is safe. Independent review and public availability of the findings are important safeguards, particularly before occupation. [16]

4.6 Planning implications: a conditional, evidence-led conclusion

The available documentary record justifies a demanding programme of asbestos-specific and wider contaminated-land investigations. It does not justify asserting that asbestos has already harmed local residents, that the site is incapable of remediation or that former occupants were necessarily exposed. HSE advises that symptoms of asbestos-related disease may take approximately 15–60 years to appear after exposure; the latency varies by disease and exposure history. A contaminated site can sometimes

be made suitable for housing, but that suitability must be demonstrated using robust site evidence, competent remediation, verification and a credible financial and planning programme. [14–16, 18]

RDC, Homes England and adjoining owners should therefore agree the true site boundaries, contaminant responsibilities, schedule and available redevelopment area after flood, ecological and drainage constraints. If the remediation and infrastructure requirements cannot be met, the dwelling yield, design or phasing should be revisited before relying on the allocation as a deliverable housing contribution.

Questions linked to this section: N1–N12. Full surveys, historical risks, neighbouring and watercourse protection, accountable removal, verification and 364/250-home reconciliation.

5. Questions to Rother District Council

These questions follow the four areas of the Main Report. They request evidence, policy clarification and delivery commitments rather than assume that an acknowledged risk is necessarily unacceptable. They are addressed to RDC as the planning authority; where another body holds the relevant operational information, RDC is asked to identify it and coordinate an appropriate response.

Cross-references beneath each question point to the relevant substantive analysis. Responses should identify documentary evidence, responsible organisations, funding status, dates, enforceable conditions and what remains under investigation.

5A. Flooding — F1 to F12

F1 Complete flood-risk mapping. Will RDC provide detailed mapping for every proposed Bexhill housing allocation, showing the precise extent of Flood Zones 2, 3a and 3b, surface-water flooding, groundwater risks, culverts, watercourses and areas affected by future climate-change projections?
Relevant Main Report section(s): §1.1–1.2

F2 Actual developable land. What proportion of each development allocation can safely accommodate houses, roads, gardens and essential infrastructure once flood-prone land, watercourses, protective buffers and drainage areas have been excluded?
Relevant Main Report section(s): §1.1–1.2

F3 Independent flood-risk assessments. Have independent, site-specific Flood Risk Assessments been undertaken for the 12 allocations identified in our preliminary review as requiring high-priority scrutiny? Will RDC publish the results and identify outstanding investigations? The relevant allocations are BX5, BX9, BX17, BX19, BX20, BX25, BX28, BX29, BX30, BX31, BX33 and BX43.
Relevant Main Report section(s): §1.2

F4 Sequential and Exception Tests. Can RDC provide the completed Sequential Test and, where applicable, Exception Test evidence for these allocations, together with the justification for selecting sites containing flood-risk constraints rather than reasonably available lower-risk alternatives?
Relevant Main Report section(s): §1.1–1.2

F5 Groundwater levels. What actual groundwater investigations have been undertaken, particularly at Northeye, Barnhorn Road, Rosewood Park, Beeches Farm, Worsham Farm and developments adjoining the Combe Haven corridor? Do these include seasonal measurements during wet winters and dry summers?
Relevant Main Report section(s): §1.4; §4.4

F6 Climate change and rising sea levels. How have projected sea-level rise, more intense rainfall, groundwater changes and future coastal conditions been incorporated into the assessment of residential development over its expected lifetime, rather than merely to the Local Plan's end date of 2042?
Relevant Main Report section(s): §1.4–1.5

F7 Existing drainage failures. What remedial action has been completed following earlier flooding investigations involving Turkey Road, London Road, Westcourt Road and other established Bexhill flooding locations? Can RDC obtain dated confirmation from East Sussex County Council, Southern Water and other relevant authorities?
Relevant Main Report section(s): §1.3

F8 Culverts and watercourses. Where existing streams pass through culverts beneath or adjoining proposed development sites, have their structural condition, hydraulic capacity, maintenance responsibilities and susceptibility to blockage been assessed? Which improvements are required before development can proceed?
Relevant Main Report section(s): §1.2–1.3

F9 Cumulative flooding. Have the combined drainage effects of all the proposed developments been modelled across the Combe Haven, Watermill Stream, Picknell Green Stream, Worsham and Pevensey Levels catchments, including effects on neighbouring existing properties?
Relevant Main Report section(s): §1.5

F10 Flood mitigation and displacement. Where developers propose raising land or finished floor levels, creating flood-storage areas or installing sustainable drainage systems, how will RDC establish that floodwater is not simply displaced onto adjoining land or existing residential properties?
Relevant Main Report section(s): §1.5; §2.1

F11 Long-term drainage maintenance. Who will own, maintain, inspect and finance the sustainable drainage systems, attenuation ponds, culverts and associated flood infrastructure after completion? What enforceable arrangements will ensure their continuing effectiveness?
Relevant Main Report section(s): §1.5

F12 Development phasing and housing numbers. Where investigations demonstrate that satisfactory flood protection, safe access, drainage capacity or an acceptable development layout cannot be achieved, will RDC reconsider the number of dwellings allocated, their location or the permitted phasing of construction and occupation?
Relevant Main Report section(s): §1.5; §3.9

5B. Insurance risk — I1 to I8

I1 Evidence of future insurability. What independent assurance has RDC obtained that dwellings proposed within identified flood-sensitive locations will be capable of obtaining appropriate buildings insurance, including flood cover, at commercially affordable premiums?
Relevant Main Report section(s): §2.1–2.5

I2 Exclusion from Flood Re. Given that newly constructed dwellings completed on or after 1 January 2009 are ineligible for Flood Re, what consideration has RDC given to the insurance

implications for purchasers of proposed properties in areas with significant flood or drainage constraints?
Relevant Main Report section(s): §2.2

I3 Premiums, excesses and exclusions. Has RDC consulted insurers, insurance brokers or relevant industry organisations concerning indicative premiums, policy excesses, exclusions from flood cover and the possibility of refusal of insurance for properties within the more flood-sensitive allocations?
Relevant Main Report section(s): §2.3–2.5

I4 Effectiveness of engineering mitigation. What evidence demonstrates that insurers will recognise developers' proposed flood-mitigation measures, including raised ground levels, drainage installations and flood-storage facilities, as sufficiently reducing the risk to permit affordable insurance?
Relevant Main Report section(s): §2.1; §2.4–2.5

I5 Mortgage availability. Has RDC considered whether restrictions on obtaining comprehensive buildings insurance could affect mortgage lending, property valuations, resale opportunities and the long-term financial security of purchasers?
Relevant Main Report section(s): §2.3

I6 Future climate-related insurance risk. How will RDC assess the possibility that properties initially considered insurable may become increasingly expensive or difficult to insure as flood-risk assessments and climatic conditions change over subsequent decades?
Relevant Main Report section(s): §2.3–2.5

I7 Information provided to purchasers. Will RDC seek appropriate arrangements to ensure that future purchasers are informed of material flood risks, residual risks following mitigation, relevant insurance limitations and any continuing property-owner responsibilities for flood-protection measures?
Relevant Main Report section(s): §2.3–2.5

I8 Consequences for development viability. If independent insurance evidence indicates that appropriate flood cover may be unavailable or prohibitively expensive for a proposed residential development, will RDC reconsider the suitability, density, layout or phasing of the relevant housing allocation?
Relevant Main Report section(s): §2.5; §3.9

5C. Infrastructure — IN1 to IN19

IN1 Overall development and population calculations. Will RDC confirm the intended delivery programme for the 4,464 baseline allocated homes, together with the potential additional 5–10 homes at Barnhorn Green, and provide a site-by-site schedule of expected completions through 2042? Will the programme distinguish between new residents, existing Bexhill residents relocating within the town and net population growth?
Relevant Main Report section(s): §3.1

IN2 Infrastructure Delivery Programme. Will RDC publish a comprehensive, costed Bexhill infrastructure delivery programme identifying each essential project, its funding source, responsible organisation, implementation date and relationship to individual housing allocations?
Relevant Main Report section(s): §3.8–3.9

IN3 Roads and traffic capacity. Has RDC undertaken cumulative traffic modelling covering the complete housing and employment development programme, including the A259, Little Common roundabout, A269, Ninfield Road, Watermill Lane, Haven Brook Avenue and principal town-centre junctions? Will the results, proposed highway improvements and delivery dates be published?
Relevant Main Report section(s): §3.2; §3.9

IN4 West Bexhill transport strategy. Given that a western bypass is not anticipated within the Plan period, what evidence demonstrates that existing roads, together with proposed improvements, can accommodate development in St Mark's and adjoining western Bexhill without unacceptable congestion or road-safety problems?
Relevant Main Report section(s): §3.2; §3.9

IN5 Walking, cycling and accessibility. What fully funded provision will be made for safe footpaths, pedestrian crossings, cycle routes, wheelchair access and connections between new developments, schools, shops, medical centres, railway stations and existing communities? Will necessary off-site links be completed before substantial residential occupation?
Relevant Main Report section(s): §3.2

IN6 Public transport. What additional bus services are planned for West Bexhill, North Bexhill and the Haven Brook Avenue corridor? Which operators will provide them, at what frequency, and what funding arrangements will guarantee their operation beyond any initial developer subsidy?
Relevant Main Report section(s): §3.2; §3.9

IN7 Primary schools and nurseries. What are the confirmed locations, pupil capacities, construction costs, funding arrangements and expected opening dates for the proposed primary-school and nursery provision at Worsham Farm, West Bexhill and North Bexhill?
Relevant Main Report section(s): §3.3; §3.8

IN8 Secondary education and special educational needs. Have school-place forecasts been extended to 2042 and adjusted for the anticipated number, size and occupancy of new dwellings? What provision is planned for secondary education, special educational needs and disabilities (SEND), and additional nursery and childcare demand?
Relevant Main Report section(s): §3.3

IN9 Healthcare provision. What are the confirmed funding and delivery arrangements for the proposed medical facilities at Beeching Road and Barnhorn Green? Has NHS Sussex committed to sufficient clinical staff, premises, equipment and operating expenditure to meet the additional demand? What provision is anticipated for dentistry, pharmacies and community healthcare?
Relevant Main Report section(s): §3.4; §3.8

IN10 Adult social care. What assessment has been undertaken of the additional demand for residential and nursing care, domiciliary care, disability support and associated transport services, taking into account Bexhill's existing older population and the likely age profile of future residents?
Relevant Main Report section(s): §3.4

IN11 Water supply and wastewater treatment. Have Southern Water and South East Water confirmed that water supplies, foul sewers, pumping stations and treatment works can accommodate the cumulative development proposed? Which network improvements must be completed before additional homes may be occupied?
Relevant Main Report section(s): §3.5; §3.9

IN12 Electricity and communications. What assessments have been undertaken of additional electricity demand from housing, employment development, electric vehicles and heat pumps? Have network operators confirmed the necessary capacity, reinforcement programmes and delivery dates? What arrangements are proposed for broadband, mobile connectivity and accessible electric-vehicle charging?
Relevant Main Report section(s): §3.5

IN13 Emergency services. Have Sussex Police, East Sussex Fire and Rescue Service and South East Coast Ambulance Service been consulted on the cumulative effects of development? What additional staffing, equipment, premises, emergency access arrangements or other resources have they identified as necessary?
Relevant Main Report section(s): §3.6

IN14 Community facilities, sport and recreation. What guarantees exist for the delivery, funding and long-term maintenance of the community buildings, playing fields, sports pitches and recreational facilities included in the development proposals? In particular, will replacement sports provision at Sidley and the proposed Worsham facilities be completed and available at the required stages of development?
Relevant Main Report section(s): §3.6; §3.8

IN15 Green infrastructure and environmental protection. How will RDC ensure that the expansion of residential and commercial development does not cause unacceptable damage to ancient woodland, the Combe Haven corridor, Pevensey Levels habitats or other important ecological areas? What independently assessed protective buffers, monitoring systems and long-term management arrangements will be required?
Relevant Main Report section(s): §3.7

IN16 Geological and palaeontological protection. Will RDC require a specific Geological and Palaeontological Impact Assessment in connection with Policy BX36 and development close to Ashdown Brickworks, taking account of the scientific importance of the fossil-bearing deposits and the need to protect continuing geological investigations?
Relevant Main Report section(s): §3.7

IN17 Developer contributions and viability. What financial contributions towards roads, schools, healthcare, drainage, affordable housing and community facilities are expected from developers? Where developers subsequently claim that agreed contributions make schemes financially unviable, what independent scrutiny, review mechanisms and safeguards will prevent essential infrastructure or affordable housing from being disproportionately reduced?
Relevant Main Report section(s): §3.8–3.9

IN18 Infrastructure before occupation. What legally enforceable planning conditions, Section 106 agreements, Section 278 agreements or other mechanisms will ensure that essential services and infrastructure are operational before the relevant housing-occupation thresholds are reached? How will RDC respond where necessary infrastructure is delayed, underfunded or undeliverable?
Relevant Main Report section(s): §3.9

IN19 Evidence and policy consistency. Will RDC reconcile discrepancies between site-allocation references in the Regulation 19 Local Plan and the September 2026 Infrastructure Delivery Plan, including references to the Worsham school, Beeches Farm school and Barnhorn Green medical

centre? Can RDC provide one agreed, updated schedule linking each infrastructure project to the correct allocation policy?
Relevant Main Report section(s): §3.8

5D. Northeye asbestos — N1 to N12

N1 Publication of contamination evidence. Will RDC obtain and make available the existing geo-environmental, contamination and technical investigations of Northeye, including the studies commissioned before the Home Office acquired the site in 2023? Which recommendations for supplementary investigations have been completed, and which remain outstanding?
Relevant Main Report section(s): §4.2; §4.4

N2 Comprehensive asbestos survey. Has a comprehensive asbestos survey been completed covering all remaining buildings, demolition materials, buried waste and potentially contaminated ground? Does the evidence identify the type, location, quantity, condition and likely disturbance risk of asbestos-containing materials?
Relevant Main Report section(s): §4.4

N3 Ground contamination. What intrusive ground investigations have established the horizontal and vertical extent of asbestos and any other contaminants? Have soils, made ground, former building foundations, demolition deposits and areas affected by historic site operations all been examined?
Relevant Main Report section(s): §4.4

N4 Historical disturbances. What consideration has been given to the history of construction, refurbishment, demolition and the major prison fire of April 1986 in identifying areas where asbestos-containing materials may have been damaged, disturbed, buried or dispersed? Will RDC seek relevant historical surveys and records from Homes England and government departments?
Relevant Main Report section(s): §4.1; §4.4

N5 Groundwater and watercourse contamination. Have investigations established whether contaminants could be mobilised through groundwater, surface-water drainage or flooding, including any potential pathways towards the East Stream and neighbouring drainage networks? What environmental protection and monitoring measures are proposed where such pathways exist?
Relevant Main Report section(s): §4.4

N6 Demolition and asbestos removal. What detailed demolition and asbestos-removal strategy is proposed, including contractor competence, regulatory notifications, dust suppression, air monitoring, waste containment and disposal at appropriately authorised facilities?
Relevant Main Report section(s): §4.5

N7 Protection of neighbouring residents. What measures will be required to protect neighbouring households, businesses, road users and the local environment from asbestos fibres and contaminated dust during site clearance, excavation and construction? Will the monitoring results be independently reviewed and made publicly available?
Relevant Main Report section(s): §4.4–4.5

N8 Remediation costs and responsibility. What is the latest independently supported estimate of the total cost of demolition, asbestos removal, ground remediation, environmental monitoring and final site certification? Which organisation or landowner will meet those costs, and how will RDC establish that sufficient funding is available before residential development proceeds?
Relevant Main Report section(s): §4.3; §4.5

N9 Independent verification of completed remediation. What independent procedures will verify that remediation has achieved the standard necessary for the proposed residential use, including private gardens and children's play areas? Which regulatory bodies will review the results, and will the validation reports be published before the affected land is occupied?
Relevant Main Report section(s): §4.5

N10 Residual contamination and future monitoring. If any contamination is proposed to remain safely managed beneath buildings, roads or landscaped areas, what long-term restrictions, inspection arrangements, maintenance obligations and disclosure requirements will protect future residents and property owners?
Relevant Main Report section(s): §4.5

N11 Reconciliation of proposed housing numbers. How does RDC reconcile the 364 dwellings allocated under Policy BX25 with Homes England's emerging proposal for up to 250 homes? Can RDC provide a definitive map separating Homes England's land from the adjoining privately owned parcels, together with the proposed dwelling capacity and remediation responsibilities for each?
Relevant Main Report section(s): §4.3

N12 Development feasibility and future planning decisions. Before confirming the final residential capacity at Northeye, will RDC require evidence demonstrating that the site can be safely remediated, that remediation is financially deliverable, and that the proposed housing, access, drainage and infrastructure can be provided without unacceptable residual risks? If these conditions cannot be demonstrated, will RDC reconsider the allocation's capacity, layout or delivery timetable?
Relevant Main Report section(s): §4.6

General request applying to all four sections

The Town Council requests that RDC distinguish clearly between measures already completed, measures with secured funding and binding delivery commitments, and proposals that remain dependent upon future investigation, funding or agreement. Where the relevant evidence is held by another organisation, RDC is requested to identify that organisation and, where appropriate, obtain or coordinate the necessary response.

The purpose of these questions is to establish whether the proposed allocations are supported by sufficiently robust evidence and whether their safe and sustainable delivery can reasonably be demonstrated.

6. Conclusions

This assessment concerns the quality of the evidence supporting the proposed Bexhill allocations and the prospects for their safe and sustainable delivery. It is not an argument that Bexhill should accept no new housing, or that every site containing a drainage or contamination constraint should automatically be removed from the Plan. The correct public-interest test is whether development can be located and phased responsibly, with the safeguards necessary for both present and future residents.

The first conclusion is that mapping and technical definition matter. Flood Zones or surface-water constraints shown on part of an allocation are not the same as finding that every home would be exposed; conversely, a high-level assurance that drainage will be addressed is not equivalent to a completed climate-adjusted engineering assessment. RDC should supply comparable, plot-level maps and catchment modelling and show that interventions do not shift harm onto existing neighbours.

Second, long-term financial viability extends beyond construction. Insurance companies are not bound by planning approvals, and newly completed properties are generally excluded from Flood Re. The availability of suitable flood cover, reasonable excesses and potential consequences for lending and resale therefore deserve a separate, evidence-based assessment for flood-sensitive plots.

Third, infrastructure must be delivered at the point it is actually needed. The Local Plan and Infrastructure Delivery Plan identify many appropriate investments, including schools, transport, drainage, sport and healthcare. Some works have been delivered or funded. But, for several major services, the evidence reviewed does not yet establish full cost, committed funding, operating staffing and enforceable occupation timing. A unified, version-controlled infrastructure delivery schedule would be a constructive way to resolve uncertainty, giving clear responsibilities to RDC and its partners.

Fourth, Northeye warrants particular independent scrutiny. The official record documents serious pre-acquisition concerns about contamination, including asbestos, and shortcomings in the original public acquisition process. Those facts require careful remediation evidence. They do not prove that future safe residential use is impossible or that the surrounding community has suffered exposure. A verified asbestos and soil-risk assessment, protected working method, accountable finance and independent validation must precede any justified conclusion about residential capacity.

Fifth, the geographical concentration of much of the proposed development in Sidley and St Mark's means that town-wide summary figures can conceal severe local pressure, even though schools, roads, healthcare and water infrastructure serve populations across all ward boundaries. A defensible evaluation must use full-development scenarios and avoid relying exclusively on ward averages or present-day spare capacity.

The Town Council's most productive course is therefore to seek documentary answers to the 51 questions in section 5, prioritise issues that bear directly on the Plan's legal compliance and soundness, and test responses against published evidence and delivery commitments. Where shortcomings remain material, they should be recorded in precise, evidence-led Regulation 19 representations, distinguishing matters already secured from those still dependent on future work. The current consultation is scheduled to close on 24 November 2026. [1, 17]

The governing principle is straightforward: housing and employment growth should be planned with—not ahead of—the flood protection, environmental safeguards, infrastructure and financial resilience upon which successful communities depend.

Appendices

NORTHEYE: THE PRISON YEARS AND ASBESTOS

Report One - HMP Northeye, 1969-1992

Evidence review and questions requiring further disclosure

Purpose and central question

This report asks a narrower and more evidentially useful question than whether HMP Northeye simply 'contained asbestos'. The public record now establishes that asbestos-containing materials remained in buildings at Northeye and that asbestos was also present in contaminated ground when the site was investigated in 2023. What has not yet been established publicly is which materials were present during the prison years, where they were located, what condition they were in, whether fibres were released, and what the Home Office knew at the relevant dates.

Those distinctions matter. Asbestos-containing material can sometimes remain in place without presenting a significant exposure risk if it is intact and properly managed. The principal danger arises when material is damaged, deteriorating, cut, drilled, demolished or otherwise disturbed so that fibres become airborne. Northeye therefore presents a particularly important historical question because the prison occupied older RAF structures, later buildings were added, and a serious riot and fire occurred in April 1986.

1. When did HMP Northeye come into existence?

Northeye originated as a wartime RAF site. Rother District Council's planning history records an RAF base dating from 1944, followed by development as a prison. HMP Northeye opened in January 1969 as a Category C training prison and remained in prison use until 1992. Some surviving accounts indicate that original RAF buildings were adapted for prison purposes and that further prison buildings were added during the 1970s. This places construction and adaptation squarely within the period when asbestos-containing products were widely used in British buildings.

That chronology does not by itself prove that every accommodation block contained asbestos. The stronger evidence comes later: the 2023 geo-environmental review commissioned during the Home Office acquisition identified asbestos-containing materials in existing buildings and asbestos contamination in the ground as the site's primary contamination risk. The unanswered historical question is therefore which of those materials date from the RAF period, which from prison conversion or later prison construction, and which may derive from later refurbishment or demolition.

> Sources: Rother District Council, Development and Site Allocations history of Northeye; Heritage Gateway; National Audit Office, Investigation into the acquisition of the Northeye site for asylum accommodation (2024).

2. What happened during the 1986 fire?

On 30 April 1986 a major disturbance occurred at Northeye. Home Secretary Douglas Hurd told the House of Commons that prisoners had set fire to an office, kitchen, library and other structures; parts of the prison were burnt out and conditions were initially too unsafe for the fire brigade to enter. Later historical records confirm substantial fire damage and that Northeye subsequently reopened for a smaller number of prisoners.

For an asbestos investigation, the fire is a pivotal event. Heat, structural collapse, firefighting, debris clearance and subsequent repair or demolition can disturb asbestos-containing materials. The public sources examined for this report do not disclose an asbestos survey made immediately before or after the 1986 fire, air-monitoring results, waste records identifying asbestos debris, or a health-exposure

assessment for prisoners, prison officers, firefighters or contractors. Their absence from the public record does not establish that no such records ever existed; it establishes that they have not yet been located in the material reviewed.

3. What did the Home Office know and what did it do?

During the prison period the prison service fell within the Home Office. The key historical issue is therefore not to assume negligence retrospectively, but to establish the documentary trail. Relevant records would include building plans and specifications, asbestos surveys, maintenance files, works orders, fire-damage reports, demolition contracts, occupational hygiene reports, prison inspection reports, accident records and correspondence concerning the 1986 recovery works.

The 2023 discovery creates a legitimate question about continuity of knowledge. If asbestos-containing materials surviving in 2023 can be matched to prison-era buildings, the next questions are whether their presence was previously recorded, whether damaged material was removed after the fire, whether remaining material was encapsulated or managed, and what warnings were given to staff and contractors. At present, the public evidence reviewed does not answer those questions.

4. Was the prison population necessarily exposed?

No conclusion of actual harmful exposure can presently be drawn merely from the existence of asbestos-containing material. Exposure depends on fibre release, concentration, duration and frequency. A prisoner living in a building containing intact asbestos cement is not in the same evidential position as a worker cutting asbestos insulation board or a person present during uncontrolled demolition. The 1986 fire and subsequent clearance nevertheless make exposure records especially important because damaged material may have presented a different risk from material left undisturbed.

5. How long can asbestos-related disease take to appear?

The Health and Safety Executive states that asbestos-related diseases do not appear immediately and that symptoms can take approximately 15 to 60 years to develop after exposure. HSE material also describes an average latency of around 30 to 40 years in some contexts. Asbestosis is one asbestos-related disease; mesothelioma, asbestos-related lung cancer and pleural disease are separate outcomes. It is therefore better to ask about all asbestos-related disease rather than asbestosis alone.

This latency is important to Northeye. Someone exposed during the early prison years could have developed disease decades ago; someone exposed around the 1986 fire could still fall within a medically relevant latency period in the 2020s, 2030s or beyond. The passage of time therefore does not make the historical question obsolete. It makes preservation of records and the possibility of retrospective cohort tracing more important.

> Source: Health and Safety Executive, Asbestos FAQs and asbestos health-risk guidance: symptoms may take 15-60 years to develop; HSE educational guidance also cites an average 30-40 year latency.

6. Has government traced former prisoners or staff?

No published cohort study, mesothelioma follow-up, asbestosis survey or Northeye-specific health-surveillance programme for former prisoners or staff has been located in the public sources reviewed. Nor has evidence been located showing that the Home Office or successor prison authorities asked former prisoners, officers, firefighters or contractors whether they subsequently developed asbestos-related disease.

That is an evidence gap rather than proof that no internal exercise has ever occurred. Because medical information is sensitive, any investigation would have to be conducted lawfully and would not necessarily be published in identifiable form. A more realistic question for government is whether any exposure register, incident list or cohort identification exercise exists and whether aggregate mortality or disease data have ever been examined.

7. The later asylum decision - what does it prove?

In February 2023, investigations commissioned for the proposed Home Office acquisition identified contamination across the site as a high risk and concluded that the primary contamination risk arose from asbestos-containing materials in buildings and contaminated ground. The National Audit Office later found that the Home Office did not complete all recommended investigation before committing to the purchase. In May 2023 the site was judged unsuitable for the original non-detained asylum accommodation programme, and government subsequently abandoned its use for asylum accommodation.

This does not prove that Northeye was unsafe throughout 1969-1992. Conditions, building fabric, deterioration and proposed intensity of occupation differed. It does, however, justify asking a historical accountability question: if contamination severe enough to contribute to rejection of modern residential use existed in structures or ground inherited from earlier periods, what was known about it when prisoners and staff occupied the site and after the 1986 fire?

8. Questions that should now be put to government

The most useful next step would be a focused request to the Home Office, Ministry of Justice, HM Prison and Probation Service and National Archives asking whether prison-era asbestos surveys, building registers, fire-recovery records or demolition files survive; whether the 1986 disturbance triggered asbestos assessment or air monitoring; which buildings identified with asbestos in 2023 can be dated to prison or RAF use; and whether any staff or prisoner exposure incident was formally recorded.

Government should also be asked whether any retrospective health review has been undertaken for Northeye staff or prisoners, whether occupational disease claims have been identified, and whether records exist that would permit an anonymised epidemiological review. A further question is whether firefighters and contractors involved after the 1986 fire were informed of asbestos hazards and whether their employers retained exposure records.

Conclusion

The evidence supports concern, but it does not yet support a finding that prisoners were knowingly housed in an unsafe asbestos environment. HMP Northeye operated from 1969 to 1992 on a site containing older RAF buildings and later prison structures. A major fire occurred in 1986. Modern investigation has confirmed asbestos-containing materials in buildings and contaminated ground. What is missing is the documentary bridge between those facts: the historical surveys, the precise location and condition of asbestos, the response to the fire, and any exposure or health records.

The later rejection of Northeye for asylum accommodation makes those unanswered questions more, not less, important. The appropriate inquiry is not simply 'Was there asbestos?' but: Where was it? When was it known? Was it disturbed? Who may have been exposed? What precautions were taken? What records survive? And has anyone ever examined the long-term health outcomes of the people who lived and worked there?

Principal sources

National Audit Office (2024), Investigation into the acquisition of the Northeye site for asylum accommodation.

House of Commons Committee of Public Accounts (2025), Asylum accommodation: Home Office acquisition of former HMP Northeye, HC 361.

Hansard, 30 April 1986, statement by Home Secretary Douglas Hurd on the Northeye disturbance and fire.

Health and Safety Executive, Asbestos FAQs; Cancer and construction: Asbestos.

Rother District Council, Development and Site Allocations material for Land at Northeye; Historic England/Heritage Gateway record for Northeye.

NORTHEYE: THE UAE TRAINING YEARS AND ASBESTOS

Report Two - United Arab Emirates use after HMP Northeye

Evidence review and questions requiring further disclosure

Purpose and central question

After HMP Northeye closed in 1992, the site passed into use as a training establishment associated with the United Arab Emirates (UAE). The central question is whether asbestos hazards inherited from the RAF and prison periods were identified, remediated or disclosed before UAE trainees and staff occupied the site, and whether any later health follow-up has been undertaken.

The available evidence establishes the succession of uses more securely than it establishes the asbestos-management history. Rother District Council records that the prison existed until 1992 and was then taken over by the United Arab Emirates. Heritage Gateway records that the camp was refurbished and functioned as the United Arab Emirates Training Project Campus. Other secondary accounts place UAE use from approximately 1993 until 2010. The public sources reviewed do not disclose what asbestos information accompanied the transfer or refurbishment.

1. When did UAE use begin?

The prison closed in 1992. Rother's planning evidence states that the site was subsequently taken over by the United Arab Emirates and used as a training centre. Heritage records describe refurbishment of the former prison for the United Arab Emirates Training Project Campus. Secondary historical accounts commonly date the takeover to 1993 and the end of training use to about 2010. For formal purposes, the exact commencement and cessation dates should be verified against conveyancing, planning, Home Office and UAE project records.

The training use appears to have involved accommodation, education and operational buildings across a substantial part of the approximately 15-hectare site. This matters because it was not merely occasional access to derelict land: the site was adapted for an organised training function following its prison use.

> Sources: Rother District Council, Development and Site Allocations material; Heritage Gateway record; National Audit Office (2024), which records that the site was sold by the UAE in 2022.

2. What was known about asbestos when the site changed use?

The present public record does not establish what asbestos survey was undertaken before the UAE occupation, what materials were removed during refurbishment, or what remained in situ. This is a particularly important gap because the site contained buildings dating from periods when asbestos products were widely used and had suffered a major prison fire in 1986.

The 2023 geo-environmental review provides firm later evidence: asbestos-containing materials remained in existing buildings and asbestos was present in contaminated ground. That finding does not establish that the same condition existed unchanged in 1993, nor does it prove exposure of UAE trainees. It does show that refurbishment and years of subsequent occupation did not result in complete removal of asbestos from the site.

3. What did the Home Office tell the UAE?

No publicly available document located for this report records what the Home Office, Prison Service or another government body told the UAE about asbestos at Northeye when the prison closed or when the training project was established. No asbestos disclosure schedule, condition survey, transfer dossier or warning letter has been located in the public material reviewed.

This is one of the most important questions for archival or Freedom of Information research. The relevant evidence may lie in disposal papers, property transfer records, diplomatic correspondence, refurbishment specifications, survey reports, contractor files or project agreements. The correct

question is therefore not to assume that the UAE was not warned, but to ask government to produce the record showing what information was supplied and what asbestos-management obligations accompanied the transfer.

4. Did refurbishment itself create a risk?

Refurbishment of an older building is precisely the type of activity in which asbestos can become hazardous if materials are disturbed without adequate identification and controls. Modern HSE guidance requires asbestos to be identified before maintenance, refurbishment or demolition work and stresses that those responsible for non-domestic premises must manage the risk. The legal regime in the early 1990s was not identical to today's, so present duties should not simply be projected backwards; nevertheless, refurbishment records are central to establishing what was found and how it was handled.

5. How long can disease take to become apparent?

HSE states that asbestos-related diseases may take approximately 15 to 60 years before symptoms develop. Other HSE material describes an average latency of around 30 to 40 years. The term 'asbestosis' should not be used as shorthand for every possible consequence: mesothelioma, asbestos-related lung cancer, asbestosis and pleural disease are distinct conditions with different exposure relationships.

The timing makes the UAE period highly relevant today. If trainees, instructors, maintenance workers or contractors experienced significant fibre exposure during refurbishment or occupation in the 1990s or 2000s, disease could potentially emerge many years later. This does not mean that such disease will occur or that exposure has been established; it means that the latency window remains open for some former users.

Source: Health and Safety Executive, Asbestos FAQs and asbestos health-risk guidance.

6. Has the UAE or UK government traced former trainees?

No published health-surveillance study, cohort follow-up or Northeye-specific asbestos disease investigation involving UAE trainees, instructors or support personnel has been located in the sources reviewed. Nor has public evidence been found showing that the Home Office asked the UAE authorities to identify former users of the campus and determine whether asbestos-related diseases had subsequently been diagnosed.

Again, absence from the public record is not proof that no communication occurred. Medical information may be held confidentially and diplomatic correspondence may not be readily searchable. The appropriate question is whether the UK government has ever notified the UAE of the asbestos findings subsequently confirmed at Northeye, whether it has advised that historic users may wish to preserve exposure histories, and whether any aggregate health inquiry has been considered.

7. The significance of the asylum accommodation decision

The Home Office acquired Northeye in September 2023 after considering it for large-scale asylum accommodation. Yet the February 2023 planning appraisal had already identified a high contamination risk, while the geo-environmental review identified asbestos-containing materials in buildings and contaminated ground as the primary contamination risk and recommended further investigation. The National Audit Office and Public Accounts Committee later criticised the Home Office's due diligence, and the site was ultimately judged unsuitable for its intended asylum accommodation use.

This later decision cannot be used as proof that the site should never have housed prisoners or UAE trainees. The proposed asylum scheme involved a different date, condition of buildings, density, regulatory context and intended use. But it creates a legitimate historical question: if the inherited fabric and ground contamination were sufficiently serious to obstruct a modern residential scheme, what surveys and controls existed during earlier residential and training occupation?

8. Questions that should now be answered

The Home Office and Ministry of Justice should be asked to identify the property and disposal files covering the end of prison use and transfer to UAE occupation; disclose any asbestos register, condition survey or remediation specification supplied at that time; identify asbestos removal undertaken during refurbishment; and state whether the 1986 fire damage was specifically assessed for asbestos before the UAE project began.

Government should also be asked whether the UAE was formally informed of known or suspected asbestos hazards; whether any UK department retained responsibility for building safety, project oversight or contractor management; whether exposure incidents were recorded during the training years; and whether the later 2023 asbestos findings were communicated retrospectively to UAE authorities.

A further question is whether either government has considered a confidential tracing or health-information exercise for former trainees, instructors, maintenance personnel and contractors. Such an exercise would not assume that exposure occurred. Its purpose would be to determine whether a potentially exposed cohort can be identified and whether there is any evidence of an unusual pattern of asbestos-related disease.

Conclusion

The UAE period presents a clear documentary gap. The site moved from prison use into an organised overseas training function after refurbishment, yet the public record reviewed does not reveal what asbestos information accompanied that transition. Modern investigations prove that asbestos-containing materials and contaminated ground remained at Northeye decades later. They do not tell us whether the UAE was warned, what was removed, what remained, or whether anyone was exposed.

The later abandonment of Northeye for asylum accommodation should therefore be treated as a reason for investigation rather than as retrospective proof. The questions are capable of being framed precisely: What did the UK know at transfer? What did it disclose? What did refurbishment disturb or remove? What asbestos remained during occupation? Were any exposure incidents recorded? Was the UAE later told of the 2023 findings? And, given the 15-60 year latency of asbestos-related disease, has either government considered whether former users should be traced or their health outcomes reviewed?

Principal sources

National Audit Office (2024), Investigation into the acquisition of the Northeye site for asylum accommodation.
House of Commons Committee of Public Accounts (2025), Asylum accommodation: Home Office acquisition of former HMP Northeye, HC 361.
Rother District Council, Development and Site Allocations material: Land at Northeye (Former UAE Technical Training Project).
Historic England/Heritage Gateway record for Northeye, describing refurbishment as the United Arab Emirates Training Project Campus.
Health and Safety Executive, Asbestos FAQs; Cancer and construction: Asbestos.

ROTHER LOCAL PLAN 2025–2042

Appendix — History, Archaeology and Built Heritage

Bexhill-on-Sea: principal sites requiring archaeological or heritage scrutiny

Scope. This appendix supplements the Main Report and its existing discussion of the palaeontological importance of Ashdown Brickworks. It concerns archaeological deposits, historic buildings, farmsteads, routes and landscapes that may be affected by development allocations in RDC's Regulation 19 Proposed Submission Local Plan. The priorities below are a research-based screening exercise, not findings that every named site contains significant buried remains.

1. Why the Bexhill–Hastings Link Road discoveries matter

The archaeological investigations associated with the Bexhill–Hastings Link Road (now Combe Valley Way) demonstrated just how much of Bexhill's early history can survive unseen beneath apparently ordinary farmland and valley deposits. Historic England's 2024 study records approximately 260 separate scatters containing some 465,000 struck flints. The discoveries revealed a nationally important prehistoric landscape extending from the Late Upper Palaeolithic into the Bronze Age, with activity concentrated particularly in the Late Mesolithic, often described as the Middle Stone Age in British prehistory. More than 100 radiocarbon dates and environmental evidence have helped reconstruct repeated visits by small groups of hunter-gatherers to the margins of a former tidal inlet. [1]

The flint-working areas, hearths, buried land surfaces, peat and estuarine deposits were scientifically important not only because of the number of finds but because of their exceptionally informative positions within the landscape. The initial surface fieldwalking and trial evaluation did not disclose the true scale of the material. Some of the richest deposits were subsequently found well below the modern ploughsoil. This is a particularly important methodological lesson: an absence of visible surface finds, or a negative geophysical survey, is not by itself sufficient evidence that deeply buried prehistoric archaeology is absent. [1–3]

At the eastern end of the scheme, around Upper Wilting Farm, the excavation programme identified other phases of human activity. The April 2013 archaeological evaluation records evidence of domestic and farming settlement of the twelfth to fourteenth centuries; wider link-road investigations also identified a substantial Romano-British ironworking landscape and Anglo-Saxon occupation. These finds establish that the area's archaeological significance is not limited to prehistoric hunter-gatherers: Roman industry, early medieval agriculture and later farmsteads are all relevant to the settlement history of the Combe Haven landscape. [2–3]

The important point for the Local Plan is not that similar discoveries must exist beneath every proposed housing site. It is that Bexhill's valley edges, tributaries, former wetlands, ridges and old agricultural holdings have demonstrable potential. The archaeological consequences of disturbing them should be assessed with methods suited to local geology and burial conditions, and in time to influence design rather than simply record material during construction.

2. Bexhill allocations meriting particular attention

The allocation references below follow RDC's October 2026 Regulation 19 Part 2 chapter. "Priority" identifies where Bexhill Town Council should first seek evidence and monitor decisions; it is not a formal grading by the County Archaeologist. A distinction is made between (a) places where the Plan

itself records archaeological evidence or an Archaeological Notification Area, (b) historic farmstead and listed-building settings, and (c) further landscape areas suitable for proportionate screening. [4]

A. Strongest archaeological grounds for investigation

BX17 — Land off Spindlewood Drive (146 homes). RDC records an Archaeological Notification Area adjoining a historic medieval farm complex and states that a geophysical survey identified possible remains across the north-western field. RDC expressly calls for trial trenches before the detailed development layout is determined, so that important remains can, if necessary, be retained in situ. The Town Council should seek the geophysical report, trench results and evidence that the design responds to them. [4]

BX18 and BX19 — Barnhorne Manor and land south of Barnhorn Road (20 and 400 homes). BX18 lies within an Archaeological Notification Area and BX19 is largely within one. These sites adjoin or contain the historic farmstead and Grade II listed Barnhorne Manor (Lower Barnhorne). Archaeological assessment needs to address the former farmyard, outbuildings, approaches, fields and potential buried occupation, alongside preservation of the manor's historic setting. For BX19, the whole-site masterplan should demonstrate how this evidence influences layout, density and landscape buffers. [4, 11]

BX20 — Land north of Rosewood Park (340 homes). RDC describes this as an area of known archaeological interest and expressly requires heritage investigation under Policy HER1. This large greenfield allocation merits early archaeological assessment and, where recommended, field evaluation before the final arrangement of streets, dwellings and drainage is fixed. Any work already undertaken in connection with the planning application should be identified and reviewed before further requests are made. [4]

BX25 — Northeye and adjoining land (364-home allocation). RDC identifies an Archaeological Notification Area in the southern part and requires an assessment of archaeological potential. The site combines former RAF and prison land with additional agricultural parcels. Investigations should consider both earlier buried archaeology and the documentary, architectural and social history of twentieth-century military and institutional use. Archaeological work must be coordinated with asbestos and contaminated-land controls; no intrusive investigation should be advocated in unsafe areas without an appropriately approved health-and-safety and remediation strategy. [4]

BX8 — Former Bexhill High School, Down Road (80 homes). Part of the southern section is within an Archaeological Notification Area. The former school use and later ground disturbance do not, without evidence, rule out surviving deposits below affected levels. The Council should check the existing permission and archaeological assessment or conditions before redevelopment proceeds. [4]

BX32 — Levetts Wood and Oaktree Farm employment allocation. Although not a housing allocation, its substantial proposed employment floorspace and earthworks may affect buried remains along the Combe Haven corridor. RDC specifically refers to archaeological investigations and post-investigation assessment. The Town Council should request the archaeological programme and the arrangements for reporting and archiving results. [4]

B. Historic farmsteads, listed buildings and their settings

BX43 and BX44 — Worsham Farm (East and West; 354 and 66 homes). The wider Worsham landscape deserves particular attention. A 2009 RDC supplementary planning document identified the historic farmsteads, surviving barns, Boulder Cottage, Preston Hall and the former field pattern as important features. The 2009 document also singled out a traditional barn at Little Worsham Farm. Oxford Archaeology's earlier historical survey discusses Worsham as a place-name suggesting continuity from Anglo-Saxon into medieval occupation, although that linguistic inference does not establish the date of surviving buildings or prove buried remains on particular plots. The original 2015 Worsham development proposal expressly provided for retaining the historic main barn and attached annex at Lower Worsham Farm and historic walls at Upper Worsham Farm. The current BX43 policy requires safeguarding the setting of Grade II listed Boulder Cottage and nearby non-designated agricultural buildings. A current heritage inventory should locate precisely what remains, identify existing conservation conditions and confirm how the approved phases protect the buildings, walls, lanes, former farmstead plots and relevant below-ground deposits. Existing permissions and archaeological conditions must be checked rather than assuming fresh permissions can simply be reopened. [4, 8–11]

BX24 — Beeches Farm and land north of Barnhorn Road (540 homes). RDC identifies Grade II listed Beeches Farm and Sandhurst Lodge adjoining the eastern portion of the allocation. Their agricultural landscape, rural lanes, field boundaries and views form part of their significance. The heritage assessment should establish the relationship between these buildings and nearby fields, as well as the need for archaeological evaluation informed by the Historic Environment Record. [4]

BX21 and BX23 — Sandhurst Lane and adjoining agricultural land (68 and 25 homes). BX21 must protect the setting of the historic Gotham Farm farmstead. The separate BX23 allocation should be screened against the Historic Environment Record and mapped historic lanes and field patterns; a significant archaeological asset is not established merely by its agricultural location. The Town Council should check the correct asset boundaries and documentary history before supporting substantial access or landscape alterations. [4]

BX33 — Land north of Haven Brook Avenue (east; up to 230 homes). The Grade II listed Cockerels Farmhouse stands in the immediate historic landscape of this site. RDC identifies sensitivity not only in views of the farmhouse but in the relationship between Watermill Lane, the old agricultural fields, hedgerows and public routes. Road access, new lighting, changes in levels and building density should be assessed for their impact on this setting. Earlier desk-based work in the Preston Hall/Watermill Lane area also confirms the value of inspecting the local record for medieval and post-medieval farmstead evidence. [4, 12]

BX13 — Land at Broad Oak Park (8 homes). This smaller allocation contains surviving historic farmstead buildings that RDC identifies as a non-designated heritage asset. A measured historic-building record and heritage-led site layout should precede adaptation or demolition of fabric, with the character of the former farmyard retained where practicable. [4]

C. Landscape archaeology and other built heritage

BX28–BX31 — Kiteye Farm and the Watermill Lane/Combe Haven cluster (300, 130, 80 and 170 homes). The link-road evidence demonstrates the potential of old valley-edge and wetland deposits across the wider Combe Haven catchment. These allocations include farmland, streams, historic routes and ground likely to be altered by foundations, new roads, drainage and attenuation works. The Town Council should seek site-specific archaeological screening and, where justified, geoarchaeological boreholes, deposit modelling and test pits as well as conventional trenching. The bypass results are a reason for inquiry, not proof that these particular plots contain comparable Mesolithic material. [1–4]

BX6, BX7, BX11 and BX12 — Central Bexhill townscape sites. Here the principal issues include listed-building settings and conservation-area character, rather than a presently demonstrated case for large archaeological excavations. BX6 adjoins Grade II listed Bexhill Town Hall; BX7 includes three concrete murals by Henry Collins and Joyce Millicent Pallot, as well as nearby listed buildings and the conservation area; BX11 and BX12 lie within the Town Centre Conservation Area. These heritage features require documented protection and sensitive design, with any below-ground archaeological requirement determined by local evidence and the depth of proposed works. [4]

Other greenfield and employment allocations — including remaining parts of North Bexhill and land west of Ninfield Road — should not be treated as archaeologically sterile merely because the site-allocation policy is silent on archaeology. Where substantial groundworks are proposed, RDC should check the Historic Environment Record, historic maps, aerial photography and excavation records before deciding whether fuller assessment is needed. The separate Ashdown Brickworks palaeontology issue is addressed elsewhere in the Main Report. [4–7]

3. How archaeological requirements are normally secured

Rother District Council is the local planning authority for these allocations. It is not necessary for Bexhill Town Council to invent a separate archaeological consent system. National planning policy already provides a framework: the September 2026 National Planning Policy Framework, particularly policies HE5 and HE10, requires proportionate understanding of heritage significance, archaeological desk-based assessment and field evaluation where appropriate, preservation in situ where feasible, and proper investigation, recording, dissemination and archiving where remains cannot be preserved. RDC's proposed Policy HER1 likewise calls for assessment of above- and below-ground archaeology where there is archaeological potential. [5, 7]

The normal route is for a developer to commission a professional archaeological desk-based assessment, drawing upon the East Sussex Historic Environment Record, Archaeological Notification Area maps, earlier excavations, historic maps, LiDAR, aerial photographs, geology and relevant planning archives. The County Archaeology Team advises RDC on archaeological significance and can recommend field investigations and proportionate mitigation; archaeological consultants undertake the commissioned work, normally at the developer's expense. The precise requirement depends on site-specific evidence and is not an automatic excavation of every allocation. [6]

Where the desk assessment indicates unresolved potential, a geophysical survey, trial trenches, geoarchaeological boreholes, test pits or other specialist techniques may be appropriate. The Bexhill link-road work illustrates why survey design matters: surface methods and limited trial trenches can miss deeply buried flint-working horizons beneath peat or alluvium. In archaeologically sensitive areas,

enough investigation should occur before permission or detailed layout decisions to identify significance and determine whether remains need to be avoided. [1–3, 7]

If development is acceptable subject to mitigation, RDC may secure a Written Scheme of Investigation and suitable planning conditions dealing with excavation or watching briefs, historic-building recording, specialist analyses, reporting and deposition of finds and digital archives. Particularly important remains should be preserved undisturbed where feasible; "recording before destruction" is not automatically an adequate alternative. Projects benefiting from existing permissions may already have conditions or completed investigations, so the immediate task is to establish their status, not to assume they have been overlooked. [6–7]

4. Bexhill Town Council's proposed watching brief

Bexhill Town Council cannot act as the archaeological regulator and cannot independently impose excavation requirements. It can, however, make its heritage interest visible and ensure that the public record is scrutinised as applications and construction phases progress. A practical approach would be to:

- Maintain a short heritage register of the allocations above, recording the archaeological reason for concern, listed or non-designated assets affected, and the application or permission reference.
- Ask RDC and the East Sussex County Archaeology Team which desk-based assessments, trial-trench reports, historic-building records and archaeological conditions already exist, and which remain outstanding.
- Review whether evaluation has been completed early enough to inform final masterplans, access roads, drainage works and locations of buildings, rather than waiting until construction machinery is on site.
- Track condition discharge, approved Written Schemes of Investigation, mitigation decisions and unexpected-discovery procedures, including safe coordination with Northeye remediation.
- Seek publication or public accessibility of investigation reports, finds catalogues, suitable archives and significant discoveries, with opportunities for Bexhill Museum and local history and archaeology groups to be involved where appropriate.
- Keep historic farmstead settings, original walls, old lanes, hedgerows and notable twentieth-century artworks under review as carefully as below-ground archaeology; their value is not confined to excavated artefacts.

A first practical request to RDC would be a single site-by-site archaeological and heritage evidence schedule for the allocations identified in Section 2, showing (i) the Historic Environment Record and Archaeological Notification Area screening, (ii) any listed or non-designated assets affected, (iii) assessments and surveys already submitted, (iv) required further work, (v) preservation or mitigation conditions and (vi) completion, publication and archive arrangements. This should be capable of being updated as permissions and phases proceed.

5. Conclusion and recommendation

The Bexhill–Hastings Link Road excavations transformed understanding of the town's early settlement and demonstrated the unexpected richness of buried archaeological deposits. The medieval farming evidence at Upper Wilting and the historic Worsham, Barnhorne and Watermill Lane landscapes add a further dimension. Archaeology and built heritage should therefore be considered part of the infrastructure of place: finite evidence that, once destroyed without adequate protection or recording, cannot be reconstructed.

The Town Council should support proportionate, evidence-led archaeological investigation and heritage conservation across the Local Plan allocations, giving particular early attention to sites already recognised by RDC as archaeologically sensitive and to historic farmsteads and their settings. Its most effective contribution will be a sustained watching brief, in liaison with RDC, the County Archaeologist, Bexhill Museum and established local heritage organisations, so that redevelopment can proceed where justified without losing irreplaceable evidence of Bexhill's past.

Principal sources and supporting documentation

1. Historic England (2024), Mike Donnelly, "A Mesolithic Landscape on the Bexhill to Hastings Link Road", Managing Lithic Sites, Case Study 7. Source

2. Oxford Archaeology (April 2013), Bexhill to Hastings Link Road: Archaeological and Geoarchaeological Evaluation Report, version 3 (ESCC planning archive). Source

3. Historic England, Research Report 73/2023, Bexhill to Hastings Link Road, East Sussex: Tree-ring Analysis of Waterlogged Timbers. Source

4. Rother District Council (2026), Regulation 19 Proposed Submission Local Plan, Part 2, Chapter 10, Bexhill allocations BX5–BX47. Source

5. Rother District Council (2026), Regulation 19 Proposed Submission Local Plan, Part 1, draft Policies HER1 and HER2. Source

6. East Sussex County Council, Heritage and Planning; East Sussex Historic Environment Record, including Archaeological Notification Areas. Source

7. Ministry of Housing, Communities and Local Government (29 September 2026), National Planning Policy Framework, Chapter 20, particularly HE5 and HE10. Source

8. RDC (2009), North East Bexhill Supplementary Planning Document, "Archaeology and historic buildings". Source

9. Hastings Borough Council Planning Committee (2015), report on Worsham Farm, land north of Wrestwood Road, application RR/2015/1760/P. Source

10. Oxford Archaeology (2007), Archaeological Field Collection Survey Report, Bexhill to Hastings Proposed Link Road (place-name and Worsham context). Source

11. Historic England, National Heritage List for England: Boulder Cottage (1044255) and Barnhorne Manor, Lower Barnhorne (1352812). Source

12. Swale & Thames Archaeological Survey Company (2016), Archaeological Desk-Based Assessment: Preston Hall Farm, Bexhill. Source

ROTHER LOCAL PLAN 2025-2042 | REGULATION 19 PROPOSED SUBMISSION

Appendix - Wildlife, Biodiversity and Nature Recovery

Assessment of RDC proposals, outstanding detail and matters for Bexhill-on-Sea Town Council to monitor

20 October 2026

Purpose and evidential status

This appendix reviews the wildlife and ecological provisions in Part 1 (district-wide policies and explanatory notes) and Part 2, Chapter 10 (Bexhill site allocations) of the Rother Local Plan 2025-2042, Regulation 19 Proposed Submission. It distinguishes what the Plan actually proposes from further measures that the Town Council could reasonably request of RDC and future developers. The Plan is not yet adopted; proposed policies should not be described as existing, enforceable requirements for every site.

The review concerns the published Plan and its supporting text. Separate ecological survey reports, Biodiversity Gain Plans, individual planning consents and detailed landscaping drawings may contain additional provisions not reproduced in the Plan. Accordingly, an absence of a named feature in an allocation is an information gap to clarify, not proof that no developer will provide it.

1. What RDC already proposes

1.1 Biodiversity gain and ecological surveys

Policy ENV8 requires suitable ecological surveys for development likely to affect designated sites, protected species or wildlife habitats; it also calls for integrated biodiversity features, habitat protection and management. Policy ENV9 requires development, proportionate to its scale, to demonstrate alignment with the East Sussex and Brighton & Hove Local Nature Recovery Strategy (LNRS). Under proposed Policy ENV10, qualifying schemes would achieve at least 20% Biodiversity Net Gain (BNG), with a strategy addressing the baseline, mitigation hierarchy, location of gains and long-term management for at least 30 years (Part 1, pp.281-289).

The national statutory BNG baseline is generally 10% for development to which it applies, subject to exemptions and transitional rules. RDC's proposed 20% threshold is therefore a stronger local proposal, not a statement that the statutory national minimum is already 20%. BNG is primarily a habitat-metric requirement; installing boxes by itself does not demonstrate a 20% habitat-unit gain. [1, 3]

1.2 Nest sites, roosts and small wildlife features

The clearest commitment is in explanatory paragraph 7.91 (Part 1, p.285): development can incorporate integrated bird, bat and bee boxes or bricks; integrated swift bricks are preferred over removable units where appropriate; developers are expected to follow BS 42021:2022 guidance for bird boxes at a ratio of one per dwelling; and hedgehog passageways should be created through boundary fences and walls. These are explicit statements of expectation, but the paragraph does not by itself set out a species-by-species installation schedule or a binding condition for each allocated site.

Paragraphs 7.188-7.189 (Part 1, pp.319-320), in the heritage-building discussion, identify bats, barn owls and nesting birds in historic farm buildings. They recommend early surveys, appropriate nest features and species-specific boxes, naming swifts, house sparrows, starlings, owls and occasionally house martins as users of suitable cavities. This is especially relevant where older barns or farmsteads

are affected. The text is not an allocation-specific commitment to provide barn owl boxes or house martin cups at every site.

1.3 Existing vegetation, planting and connected habitats

Policy LAN3 (Part 1, pp.248-253) seeks to retain and enhance trees, hedgerows and woodland, resists unjustified hedgerow removal, requires at least a 15-metre buffer to ancient woodland or other priority woodland (with larger buffers where justified), and calls for new tree, hedge and woodland planting in landscaping schemes. New streets should normally be tree-lined. Appropriate native species and species diversity are favoured. Where losses are justified, replacement provision and compensation for canopy loss are expected; replacement of failed trees and hedges within five years is to be secured by conditions or obligations.

Policies ENV7, ENV8, ENV13 and ENV16 seek to protect and link habitats, improve green and blue infrastructure, and conserve the Combe Valley Countryside Park. Under proposed ENV13, developments of two hectares or more, or 50 dwellings or more, must submit a comprehensive Green and Blue Infrastructure Plan (Part 1, pp.279-282, 293-297, 308).

1.4 Water, ponds and sensitive lighting

Policies ENV2 and ENV3 call for the protection and enhancement of watercourses, habitat buffers, water quality and SuDS incorporating biodiversity as well as drainage and amenity. Within the Pevensey Levels hydrological catchment, the Plan repeatedly specifies at least three stages of treatment for relevant SuDS proposals. Policy LAN4 and its explanatory text recognise disturbance from artificial lighting, particularly to bats and ecological corridors (Part 1, pp.252-254, 261-268). These protections do not automatically provide every new neighbourhood with dedicated, clean drinking and bathing water for wildlife.

2. The particular gaps the Town Council could raise

Wildlife feature / RDC text	Further specification to seek from developers
Bird nest bricks and boxes Paragraph 7.91 anticipates one bird box per dwelling and favours integrated features.	A plot-by-plot schedule stating box/bricks by model and species, installation location, orientation, timing, final photographic evidence and responsibility for replacement. Clarify whether the one-per-dwelling expectation becomes an enforceable planning requirement.
House martins and swallows House martins appear in the historic-building notes. A specific swallow provision was not identified in the Bexhill allocation texts reviewed.	Where existing colonies or suitable conditions occur, require specialist house martin cups beneath eaves and suitable mud-collection opportunities; retain or recreate sheltered, accessible nesting ledges or cups in barns/outbuildings for swallows. Neither species is reliably catered for merely by specifying generic cavity boxes.

Wildlife feature / RDC text	Further specification to seek from developers
Bats and owls General proposals recognise roosting bats and barn owls, but do not set box numbers site by site.	Require survey-led protection of existing roosts/nests; location-specific integrated bat roosts, sensitive low-spill lighting and, only in suitable countryside habitat, correctly designed owl boxes or retention of barn access. Avoid treating boxes as substitutes for legal protection of existing sites.
Bees and other pollinators Bird, bat and bee bricks are envisaged; planting for biodiversity is supported.	Distinguish cavity-nesting solitary bees, which may use properly designed bee bricks, from ground-nesting mining bees, which principally need exposed, sunny, well-drained soil or banks. Specify native, season-long flowering forage, low-pesticide management and appropriate mowing regimes.
Hedgerows and wildlife corridors LAN3 and several site policies protect hedges and allow carefully justified losses with replacement.	Map the baseline lengths and ecological quality of hedges, separately record metres lost and gained, show continuous native-species replacement and close gaps at roads. Require survival inspections and ecological management beyond initial planting.
Ponds and water for wildlife The Plan protects several ponds and requires biodiversity-sensitive SuDS.	Identify retained ponds separately from drainage ponds; specify shallow margins, water quality and suitable aquatic vegetation, with safety provision. Ask whether additional clean, accessible wildlife-water features and seasonal wet areas are feasible on suitable sites.
Woodland, trees and dark corridors LAN3 supports woodland planting, native species, woodland buffers and replacement planting.	Provide mapped canopy targets at maturity, woodland-link planting quantities, buffering free of private gardens/roads/SuDS, protection from light spill, long-term watering and failed-plant replacement arrangements. Newly planted woodland is not a replacement for ancient woodland.

3. Bexhill allocations deserving the closest wildlife scrutiny

The following is a risk-prioritised selection. The general policies also apply to smaller brownfield and employment schemes; their omission from this table does not mean that ecological obligations are absent.

Allocation(s) and RDC proposal	Town Council watching brief
BX15 - West Bexhill Growth Area Strategic green/blue network; mature trees and ponds, habitat creation; Pevensey Levels safeguards (Part 2, pp.60-64).	Insist that masterplan principles are carried through to each detailed application, with joined-up woodland, hedge and wetland plans rather than isolated landscaped plots.

Allocation(s) and RDC proposal	Town Council watching brief
BX17 - Spindlewood Drive Central ecological corridor; existing pond expressly for ecology, not SuDS; 15 m woodland buffer; protected-species measures (pp.68-71).	Confirm exact pond boundary, ecological management and access restrictions; track woodland connectivity through roads and enforce a genuinely undeveloped buffer.
BX19 - South of Barnhorn Road Retention of hedges, woods, ponds, streams and ditches; proposed linking woodland belt with scrub and substantial green space (pp.75-81).	Request maps of every retained feature, metres of any hedge removed, woodland-belt establishment timescale and clear safeguards for Pevensey Levels water quality.
BX20-BX21 - Rosewood Park / east of Sandhurst Lane Green infrastructure, ancient-woodland protection and ecological surveys; White Admiral butterfly recorded in the locality (pp.82-88).	Require a landscape-scale species and woodland-edge management plan, including lighting, planting choices and evidence that butterfly habitats and connected woods remain functional.
BX23-BX24 - Sandhurst Lane / Beeches Farm BX23 specifically protects two ponds; BX24 retains mature hedges and field boundaries and seeks BNG (pp.92-99).	Check pond buffers and hydrology, hedgerow continuity across adjoining sites, and long-term management of greenfield habitat alongside the school and housing.
BX25 - Northeye and adjoining land Hedgerows, trees, streams, ditches and BNG areas are recognised; contamination is separately flagged (pp.100-107).	Integrate the ecological scheme with independently verified remediation and drainage protection. No wildlife habitat should be created on inadequately remediated or unsafe ground.
BX28-BX32 - Kiteye Farm, Watermill Lane and Levetts Wood Combe Haven corridors, Birchen Shaw woodland management, stream-side green space; BX32 includes ecologically designed wetland SuDS ponds (pp.115-129).	Seek a single catchment-scale ecological network and water-quality plan across related residential and employment sites, with monitoring of the new wetlands.
BX33 / BX36 - Haven Brook Avenue (east) / west of Ninfield Road Habitat corridors, protected woodland, buffers and ecological design; woodland-sensitive lighting is flagged (pp.130-146).	Require the Ecological Design Strategy, mapped habitat connectivity and lighting assessments before final layouts and construction phasing are approved.
BX43-BX44 - Worsham Farm (East and West) Existing hedgerow losses acknowledged; compensatory planting, 15 m buffers, Local Wildlife Site protections and Landscape and Ecological Management Plans (pp.162-166).	Obtain quantified hedge-loss/replacement plans, the management plans and funding; ensure boundaries, habitats and replacement planting remain coherent across different landowners and permissions.

4. Practical arrangements for an enforceable wildlife programme

Bexhill Town Council can act as a consistent local consultee and scrutinise applications and conditions, but RDC is responsible for planning decisions and enforcement. Where necessary, relevant ecological specialists, the East Sussex environmental records service, Natural England and other statutory consultees should advise. A robust, proportionate schedule for each major application should contain the following:

1. A dated ecological baseline and plans showing existing species records, hedgerow lengths, ponds, woodland, veteran trees, dark corridors, proposed building plots and construction areas.
2. A site-specific Wildlife Enhancement Schedule listing numbers, types and locations of swift/bird bricks, house martin or swallow nest cups, bat roosts, owl boxes where suitable, pollinator habitat, hedgehog routes and protected-species mitigation.
3. A planting and water plan indicating native trees and hedges, proposed new woodland links, seasonal flowering forage, suitable bare-ground bee habitat, retained waterbodies and ecological SuDS; distinguish permanent habitat from temporary construction features.
4. Conditions or planning obligations, where legally justified, establishing installation stages, ownership, maintenance funding, inspection requirements, BNG calculations and long-term ecological management.
5. A transparent monitoring record, with periodic site photographs, planting-survival audits, specialist habitat or species reviews where appropriate, and clear action when agreed mitigation fails.

Special care is required where a proposed habitat serves both public recreation and sensitive wildlife. Children's play areas, off-lead dog use, paths and lighting should not be placed in the wrong parts of ecological buffers. At Northeye, landscape installation must be coordinated with contaminated-land investigations and remediation.

5. Supplementary questions for RDC and developers

These questions are additional wildlife matters for consideration. They need not alter the Main Report's previously agreed numbered list of 51 questions unless the Town Clerk chooses to incorporate them.

1. How will RDC secure and verify the paragraph 7.91 expectation of one bird nesting box per dwelling, and what proportion will be integrated swift-compatible bricks rather than detachable boxes?
2. Which allocation sites have evidence of existing swift, house martin, swallow, bat or barn owl use, and what species-specific replacement or enhancement schemes will be required?
3. Will large developers publish plot-level Wildlife Enhancement Schedules and Ecological Design Strategies before commencement, with photographic confirmation after installation?
4. Will pollinator proposals protect ground-nesting mining bees through bare-soil habitat, rather than relying solely on cavity-type bee bricks?
5. For each development, how many metres of hedgerow and hectares of native woodland will be lost, retained, planted and managed; and how will ecological connectivity be tested?
6. Which ponds are preserved solely for wildlife; where are new wetland/SuDS habitats proposed; and how will water quality, hydrology and safe access be maintained?

7. Will RDC require comprehensive Green and Blue Infrastructure Plans for all proposals meeting the ENV13 threshold, and published BNG evidence showing whether the proposed 20% requirement is achieved?
8. Who will maintain ecological features for 30 years where required, replace failed tree and hedge planting, and correct failures in nesting, lighting or wildlife-corridor provision?
9. How will RDC coordinate adjacent Bexhill allocations so that wildlife measures are connected across property, developer and administrative boundaries?

6. Concluding assessment

RDC's emerging Local Plan is not devoid of wildlife commitments. It contains useful expectations for bird bricks, bats, bees and hedgehogs; stronger proposed BNG; extensive protection of hedges, woodland and watercourses; and specific requirements at sites such as Spindlewood Drive, Barnhorn Road, Watermill Lane and Worsham Farm. Some commitments, notably the Spindlewood pond reserved for wildlife alone, are unusually clear.

The remaining concern is one of precision and delivery. General assurances about biodiversity do not establish how many suitable nest sites, metres of hedgerow, hectares of habitat or functioning wildlife-water features a particular developer will actually provide. The Town Council should therefore seek site-specific evidence, enforceable commitments wherever justified, and publicly traceable monitoring. Its role is not to prevent appropriate development by imposing arbitrary wildlife features, but to ensure that the Plan's genuine nature-recovery opportunities are not lost between policy, planning permission and completed construction.

Primary sources and supporting guidance

[1] RDC, Rother Local Plan 2025-2042, Regulation 19 Proposed Submission, Part 1: Policies LAN3, LAN4, ENV2-3, ENV7-10, ENV13, ENV16 and HER2 supporting paragraphs (particularly §§7.91, 7.188-7.189). Online source

[2] RDC, Rother Local Plan 2025-2042, Regulation 19 Proposed Submission, Part 2: Chapter 10, Bexhill policies BX15-BX44 and accompanying explanatory text. Online source

[3] Department for Environment, Food and Rural Affairs, Understanding Biodiversity Net Gain (national 10% baseline and 30-year maintenance). Online source

[4] RSPB, House Martin (nest form and placement) and practical nest-box guidance. Online source

[5] Game & Wildlife Conservation Trust, Where to Find Our Solitary Bee Species (2026), distinguishing cavity-nesting and ground-nesting bees. Online source

[6] Natural History Museum, How to Make a Bee Hotel (limitations of cavity-nesting boxes for ground-nesting species). Online source

Source note: page numbers are those printed in RDC's September/October 2026 Regulation 19 policy and allocation documents. Site-specific checks should also examine the current planning application record, which may contain approved ecological schemes not reproduced in the draft Plan.

Main Report Sources and documentary notes

Primary policy documents and the research files supporting the four analyses are listed below. Web addresses were checked against the public sources available on 20 October 2026. Page numbers for the Council's internal screening documents refer to those versions; public policy text and project schedules may be revised subsequently.

[1] RDC, Regulation 19 Local Plan, Parts 1–2 (2026). • Open source
[2] NPPF, Chapter 18: Managing flood risk (2026). • Open source
[3] Town Council, Bexhill Flood Risk Review (18 Oct 2026); RDC SFRA. • Open source
[4] Town Council, Site Allocations Register and ward analysis (Oct 2026). • Town Council working research documents; ward/GIS figures provisional
[5] RDC, Policies ENV1–ENV4 and INF1. • Open source
[6] ESCC/JBA, Bexhill Surface Water Management Plan (2016). • Open source
[7] RDC/JBA, Strategic Flood Risk Assessment, Level 1 (2026). • Open source
[8] Environment Agency, Pevensey Bay coastal-management programme. • Open source
[9] Flood Re, household eligibility guidance; ABI parliamentary evidence. • Open source
[10] Town Council, Bexhill Insurance Research (18 Oct 2026). • Internal supporting report, 3 pages
[11] Bulverhythe Recreation Ground, application HS/FA/20/00966; Council flood records and March 2022 withdrawal. • Open source | Hastings flood plan | Bulverhythe history
[12] Town Council, Infrastructure Requirements; RDC IDP (Sep 2026). • Open source
[13] ESCC, School Organisation Plan 2025–2029 and childcare evidence. • Open source
[14] National Audit Office, Investigation into Northeye acquisition (2024). • Open source
[15] Homes England/Northeye transfer (Feb 2026); Town Council briefing. • Open source
[16] Environment Agency, Land Contamination Risk Management guidance. • Open source
[17] RDC, Regulation 19 consultation and representation guidance. • Open source
[18] Health and Safety Executive, Asbestos FAQs (latency, disposal and packaging); HSE asbestos FAQs; HSE carriage of dangerous goods FAQs.