APPENDIX C

RESPONSE TO RDC DRAFT LOCAL PLAN CONSULTATION

NOVEMBER 2026

INTRODUCTION

The Town Council recognises how much work has gone into these documents, and the parameters under which the District Council is operating.

We also understand the requirement placed upon the District Council by national government to provide sites for additional housing in the District.

In this response, the primary focus of the Town Council is upon the following matters:

- Infrastructure challenges, especially water supply
- Flood Risk
- Insurance Risk

These sections are set out below, with key questions for RDC at the end of each section.

PART ONE: EVIDENCE OF INFRASTRUCTURE CHALLENGES

1.1 Introduction

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 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.

1.2 Supply of Drinking Water

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.

The local press recently featured our local MP highlighting some of the challenges we face with our future drinking water supply, and this shows the Town Council is not alone in saying this MUST be addressed if we are going to increase our population by 10,000 people.

South East Water supplies the drinking water to Bexhill. As of the 8th of November, this was the position with their 2 main reservoirs – Ardingly was 19% full and Arlington was 38% full. Hosepipe restrictions are in place, and on the 13th of November, they confirmed that they have applied for a drought permit.

An extra 10000 Bexhill residents will require, it is estimated, 518 extra million litres of water per year.

It needs to be confirmed how this extra water supply will be delivered – and this means every year, even when there are drought years. The Town Council needs to understand how this is certain.

1.3 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.

The current position, even ahead of the new housing, is that two local schools are at capacity or above already so there are significant concerns about there being sufficient school places for the plan.

1.4 Economic Challenges

Bexhill Central and Sidley are two of the most deprived wards in England and so RDC must satisfy itself that there is enough affordable housing supply in the plan.

For example our research has shown that:

Home Ownership in Bexhill Central is only 49% and in Sidley 51% against a national average of around 65%.

21% have no qualifications in Central and 24% in Sidley against a national average of 18%.

35% of households in Central have no car.

1.5 Health Services

According to data, there are currently only three GP surgeries in Bexhill, with a combined 49848 registered patients.

It has been calculated that the Sidley GP practice has 6002 patients per GP against a national average of 2143.

So already action is needed here even before the Local Plan and the further increase in population.

Additional residents will increase demand for GP services, dentistry, community healthcare and adult social care. There is 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. So, there must be much more specific commitments of additional services.

1.6 Finally

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.

What is needed is an independently evidenced Bexhill infrastructure delivery programme, showing existing and projected capacity, funding responsibilities, implementation dates and enforceable requirements linking essential improvements to housing occupation.

1.7 Key Questions

1.7.1 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?

1.7.2 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?

1.7.3 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?

1.7.4 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?

PART TWO: FLOODING — RISKS ASSOCIATED WITH PROPOSED HOUSING DEVELOPMENT

2.1 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.

2.2 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.

2.3 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.

2.4 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.

2.5 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.

2.6 Recommendation. It is recommended that **RDC publish a 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.

2.7 Key questions

2.7.1 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?

2.7.2 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?

2.7.3 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?

2.7.4 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?

PART THREE: INSURANCE RISK — HOUSING DEVELOPMENT IN FLOOD-PRONE AREAS

3.1 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.

3.2 The Flood Re exclusion. 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.

3.3 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.

3.4 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.

3.5 Relevance to Bexhill. 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.

3.6 Recommendation. It is recommended 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.

3.7 KEY QUESTIONS

3.7.1 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?

PART FOUR: CONCLUSION

The Town Council concludes that a strategic response to this draft plan, with a particular focus on infrastructure, is the most helpful at this stage.

We ask RDC to consider these points carefully, take the actions we recommend, and respond to the questions raised.

This can all help to create the best possible Local Plan for Rother.