
**EXAMINATION OF THE ROTHER DEVELOPMENT AND SITE ALLOCATIONS
LOCAL PLAN**

**STATEMENT BY MATTHEW HORTON Q.C. RELATING TO CHAPTER 11 OF
THE PLAN CONCERNING THE SITE ALLOCATIONS IN BECKLEY FOUR
OAKS, NAMELY BEC1 AND BEC2**

Objection has been made already by Mr Horton QC to the allocation of sites BEC1 and BEC2. To avoid repetition in this Statement, the Inspector is asked to consider the attached letters of objection dated, respectively, 20th February 2017 and 5th December 2018. The objections were made by, and are pursued by, Mr Horton, both in his capacity as a resident of Beckley and as the owner of an alternative site (The Old Vineyard) which he has promoted through the Local Plan process as the best site in the village on which to provide both further market and affordable housing. That site fronts onto Whitbread Lane (the A268) and was identified as site F02 in the Rother District Council's Strategic Housing Land Availability Assessment ("SHLAA"), published in 2010. Mr Horton's professional experience qualifies him to judge the suitability of that site and of sites BEC1 and 2 preferred by Rother District Council.

Based on the Guidance Note (10/03) issued by the Inspector, dated 22nd March 2019, the Inspector proposes to focus his attention on the "*soundness*" of the allocation of sites BEC1 and BEC2 by reference to "*the process of site selection, including the underlying evidence base, and the soundness of individual sites*". In so doing, the Inspector will examine first the "*soundness of the Council's proposed boundaries and the methodology*".

It is submitted that the allocation of sites BEC1 and 2 was manifestly unsound for the following reasons:

- (i) In relation to both sites, the effect on the village development boundaries would be unacceptable, in particular:
 - BEC1 would involve development intruding into the countryside at the far northern end of the village in a manner unrelated to its established form;

- BEC2 would introduce development set far back from Main Street in a manner unprecedented in the village and contrary to recent appeal decisions.

- (ii) The proposed alterations to the village development boundaries were not dictated by the application of recognised planning principles. In the case of BEC1, the alteration originated in the owners of the Manroy factory ceasing trading and, in the case of BEC2, by the fact that the site was owned already by the District Council. In the case of BEC1, the cessation of trading does not justify a serviceable employment site being removed from the employment land available in the village. In the case of BEC2, ownership by the Council should not dictate future use.

- (iii) The western part of BEC1 adjoins the principal existing employment sites in the village and should continue to be safeguarded for employment. On Hobbs Lane itself it has been developed already for that purpose. BEC2 is part of a much larger break in the frontage to Main Street which successive Inspectors have stated should not be built upon. Viewed from King's Bank Lane close to its junction with Main Street and from Main Street itself, the contribution which BEC2 makes to that break is manifest.

- (iv) Neither site is capable of providing a much needed heart to the village. Selecting the sites reveals a complete lack of vision for the village as a whole and treats the village as a soulless collection of disconnected groups of housing. The illustrative layouts produced by Mr Horton for housing on the Old Vineyard (and adjoining land) demonstrate how such development could be provided so as to mimic suitably designed incremental growth in the village, together with open space and other facilities in a location far better placed to serve the whole village and foster it as a community.

- (v) The adoption of sites BEC1 and 2 will result in the loss of the opportunity to improve the character of the village for another decade or more.

MATTHEW HORTON Q.C.

16 April 2019

