



Rother District Local Plan 2020 - 2040

Development Strategy Background Paper

Draft (Regulation 18) Version - April 2024

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1. Introduction

Purpose

- 1.1 This background paper focuses on the Development Strategy for Rother District. The Development Strategy will determine the quantities of new housing and employment floorspace that can be accommodated over the Plan Period, and how and where it can be distributed, in line with national and local policy requirements. These requirements include achieving “sustainable development” as set out in the National Planning Policy Framework, mitigating the effects of climate change and helping the Council achieve its “net zero” emissions target by 2030.
- 1.2 The Development Strategy needs to demonstrate the extent to which the “standard method” housing need figure can be achieved (740 dwellings per annum as of 1 April 2021), bearing in mind that this is more than double the annual figure identified in the Core Strategy (335 dwellings) and more than 3 times the average net annual dwellings completions in the District since 2011 (198 dwellings)¹. An important factor in determining this will be a consideration of the significant environmental constraints that apply to the District (83% of the land is within the High Weald Area of Outstanding Natural Beauty with much land outside this designation subject to flood risk and other environmental protection including SSSIs).
- 1.3 The physical, social and economic attributes of the District are considered in determining the Development Strategy. The District is predominantly rural, with three main towns of which Bexhill is the largest and has strong links to neighbouring Hastings. Transport links, and in particular public transport opportunities, are limited. The District has an older age profile and economic weaknesses, including areas of deprivation. Its rural nature and poor connectivity risks isolation and poor access to services for some residents. To meet the principles of sustainable development, the Development Strategy must build on the District’s strengths while addressing these weaknesses.

¹ As at 1 April 2021

2. Planning Policy Framework

Legislation

- 2.1. The Planning and Compulsory Purchase Act (PCPA) 2004 sets out the legal requirement of local planning authorities in exercising their plan-making functions: that Development Plans should be prepared with the objective of contributing to the achievement of sustainable development (Section 39(2)).
- 2.2. Section 19 of the PCPA confirms that the development plan must include strategic policies to address each local planning authority's priorities for the development and use of land in its area. Section 19(1A) places a legal duty on local authorities to ensure climate mitigation and adaptation are integrated across all local planning policy.

National Policy and Guidance

National Planning Policy Framework

- 2.3. At the heart of the National Planning Policy Framework ("the Framework") is a presumption in favour of sustainable development (paragraph 11):

For plan-making this means that:

a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area (footnote 7); or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Footnote 7, referenced in paragraph 11 (b) (i) (above) confirms the policies referred to include those in the Framework relating to: habitats sites (and those sites listed in paragraph 180) and/or Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 67); and areas at risk of flooding or coastal change.

2.4. Paragraph 20 of the Framework sets out the requirements for strategic policies, which should:

... set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for:

- a) housing (including affordable housing), employment, retail, leisure and other commercial development;*
- b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*
- c) community facilities (such as health, education and cultural infrastructure); and*
- d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.*

2.5. Paragraph 22 addresses the timescales for strategic policies:

Strategic policies should look ahead over a minimum 15 year period from adoption to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.

- 2.6. Chapter 5 of the Framework is titled “Delivering a sufficient supply of homes”. Paragraph 61 confirms:

To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

- 2.7. Paragraph 67 confirms that strategic policy-making authorities should establish a housing requirement figure for their whole area:

... which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Once the strategic policies have been adopted, these figures should not need re-testing at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement.

- 2.8. In terms of identifying land for homes, paragraph 69 notes:

Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.

Planning policies should identify a supply of:

- a) specific, deliverable sites for years one to five of the plan period; and*
- b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.*

- 2.9. Paragraph 72 considers “windfall sites”² and the case for resisting inappropriate development of residential gardens:

Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.

- 2.10. Paragraph 74 considers planning for larger scale development to achieve high numbers of new homes:

The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way...

- 2.11. In relation to rural housing, paragraphs 82 to 84 note:

In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs...

To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.

² The Framework glossary defines windfall sites as: Sites not specifically identified in the development plan.

2.12. Chapter 6 of the Framework covers “Building a strong, competitive economy”. Paragraph 86 states that planning policies should:

- a) *set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth...*
- b) *set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;*
- c) *seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and*
- d) *be flexible enough to accommodate needs not anticipated in the plan.*

Paragraph 87 requires planning policies and decisions to recognise and address the specific locational requirements of different sectors.

2.13. In relation to the rural economy, paragraph 89 notes:

Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.

2.14. Chapter 9 of the Framework relates to sustainable transport. Paragraph 108 notes that transport issues should be considered from the earliest stages of plan-making and development proposals, so that matters including the following can be addressed:

- a) *the potential impacts of development on transport networks;*
- b) *opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*

- c) *opportunities to promote walking, cycling and public transport use are identified and pursued.*

2.15. In relation to managing patterns of growth, paragraph 109 notes:

The planning system should actively manage patterns of growth in support of these objectives [in paragraph 104]. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

2.16. Paragraph 110 notes that planning policies should, inter alia:

- a) *support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;*
- c) *identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development.*

2.17. Chapter 11 of the Framework addresses “making effective use of land”. Paragraph 119, in relation to brownfield land, notes:

Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land.

2.18. Paragraph 129 addresses density, confirming:

... Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes

being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances:

- a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport...
- b) the use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range.

Planning Practice Guidance: Housing Need

- 2.19. The Planning Practice Guidance (PPG) sets out the definition of “housing need” and the “standard method”:

Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations³.

The National Planning Policy Framework expects strategic policy-making authorities to follow the standard method... for assessing local housing need.

The standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply.

The standard method... identifies a minimum annual housing need figure. It does not produce a housing requirement figure.

³ Paragraph: 001 Reference ID: 2a-001-20190220

- 2.20. The PPG confirms that use of the standard method is not mandatory but the use of any other method to determine housing need should only be used in exceptional circumstances:

... if it is felt that circumstances warrant an alternative approach but authorities can expect this to be scrutinised more closely at examination. There is an expectation that the standard method will be used and that any other method will be used only in exceptional circumstances.⁴

- 2.21. If using an alternative approach, the PPG confirms that where the approach identifies a need higher than using the standard method (and adequately reflects current and future demographic trends and market signals), the approach can be considered sound as it will have exceeded the minimum starting point. However, where an alternative approach results in a lower housing needs figure than that identified using the standard method:

... the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination⁵.

- 2.22. In relation to the development strategy, specifically in rural areas, the PPG notes that people living in rural areas can face particular challenges in terms of housing supply and affordability, while the location of new housing can also be important for the broader sustainability of rural communities. Strategic policies will need to be informed by an understanding of these needs and opportunities. The nature of rural housing needs can be reflected in the spatial strategy set out in relevant policies, including in the housing requirement figures for any designated rural areas. A wide range of settlements can play a role in delivering sustainable development in rural areas, so blanket policies restricting housing development in some types of settlement will need to be supported by robust evidence of their appropriateness.⁶

Planning Practice Guidance: Economic Need

⁴ Paragraphs: 002 - 003 Reference ID: 2a-002-20190220

⁵ Paragraph: 015 Reference ID: 2a-015-20190220

⁶ Paragraph: 009 Reference ID: 67-009-20190722

2.23. The PPG notes:

Strategic policy-making authorities will need to prepare a robust evidence base to understand existing business needs, which will need to be kept under review to reflect local circumstances and market conditions.⁷

2.24. To analyse current market demand for employment land, the PPG confirms:

The available stock of land can be compared with the particular requirements of the area so that ‘gaps’ and any over-supply in local employment land provision can be identified... Analysing supply and demand will allow policy makers to identify whether there is a mismatch between quantitative and qualitative supply of and demand for employment sites.⁸

2.25. In terms of addressing the specific locational requirements for businesses, the PPG notes:

When assessing what land and policy support may be needed for different employment uses, it will be important to understand whether there are specific requirements in the local market which affect the types of land or premises needed. Clustering of certain industries (such as some high tech, engineering, digital, creative and logistics activities) can play an important role in supporting collaboration, innovation, productivity, and sustainability, as well as in driving the economic prospects of the areas in which they locate. Strategic policy-making authorities will need to develop a clear understanding of such needs and how they might be addressed taking account of relevant evidence and policy within Local Industrial Strategies. For example, this might include the need for greater studio capacity, co-working spaces or research facilities. These needs are often more qualitative in nature and will have to be informed by engagement with businesses and occupiers within relevant sectors.⁹

⁷ Paragraph: 025 Reference ID: 2a-025-20190220

⁸ Paragraph: 029 Reference ID: 2a-02920190220

⁹ Paragraph: 032 Reference ID: 2a-032-20190722

Government Review of National Policy

2.26. The White Paper published by Government, “Planning for the Future” (August 2020) proposed significant changes to the planning system. However, following a consultation and a Cabinet reshuffle, the proposed changes have been “paused” by the Government.

2.27. Notwithstanding this, the White Paper proposed a radically different method for identifying whether land was or was not suitable for development, by:

Simplifying the role of Local Plans, to focus on identifying land under three categories: Growth areas suitable for substantial development, and where outline approval for development would be automatically secured for forms and types of development specified in the Plan; Renewal areas suitable for some development, such as gentle densification; and Protected areas where – as the name suggests – development is restricted.¹⁰

2.28. The White Paper also proposed a new standard method for establishing housing need, which would be a means of distributing the national housebuilding target (of 300,000 new homes annually, and one million homes by the end of the Parliament), having regard to factors including the size of settlements (so that development is targeted at areas that can absorb the level of housing proposed), the relative affordability of places, the extent of land constraints and brownfield land opportunities. A standard requirement would differ from the current system of local housing need in that it would be binding.

2.29. A separate consultation, on changes to the standard method for calculating housing need, was launched in August 2020. If these proposals had been implemented, the standard method would have increased the level of housing need assessed in many areas, particularly rural ones. However, the proposed changes were not well-received. In its response to the consultation, the Government acknowledged the concerns raised, and the resulting changes to the standard method were less significant than originally proposed. The new standard method essentially retains

¹⁰ Planning for the Future, page 20 (MHCLG, August 2020)

the same steps as the original, but certain urban areas have their housing need figure increased by 35%. This has not affected any land in Rother district.

Regional Policy

- 2.30. Since the abolition of Structure Plans and later, Regional Spatial Strategies in 2010, there has been no regional planning policy for housing in England, meaning that it is for Local and Neighbourhood Planning Authorities to implement the requirements of the Framework and PPG.
- 2.31. There is a form of regional economic strategy, provided through the South East Local Enterprise Partnership (SELEP) which is a body designated by the Government, established for the purpose of creating or improving the conditions for economic growth in the South East area. SELEP comprises the largest LEP area in England outside London in terms of population and economic output, and covers an area encompassing the local authority areas of East Sussex, Essex, Kent, Medway, Southend and Thurrock.
- 2.32. SELEP's structure is headed by its Strategic Board which is business led, provides clear strategic leadership and sets the shared SELEP priorities. SELEP also operates a federated model of local LEP Boards by geographical area, which allows for decision-making and project prioritisation at a local level. Local businesses and business membership organisations such as the Chambers of Commerce, the Institute of Directors and the Federation of Small Businesses are represented at this level.
- 2.33. SELEP's Economic Recovery and Renewal Strategy (March 2021) sets out how it will work with partners to support a path to recovery and renewal in the short to medium term. It outlines the opportunities and needs of the SELEP area and the actions to be taken to drive the South East into new economic growth as the country recovers from the COVID-19 pandemic and establishes new ways of working internationally following the EU Transition. It sets out 4 Strategic Priorities, underpinned by 7 key objectives, and 4 guiding principles: (1) Delivering clean growth through boosting local carbon industries while cutting carbon emissions to move to net-zero; (2) Closing the digital divide to build a smart connected South-East; (3) Developing skills to retain and build a labour market

needed in a post-pandemic and post-EU economy; and (4) Addressing inequalities to build a fairer and more inclusive economy.

County Policy

- 2.34. East Sussex County Council has produced a Local Transport Plan (LTP3), which sets out how the County Council plans to improve transport and maintain the roads between 2011 and 2026. LTP3 includes plans for regeneration and development in priority areas such as Bexhill and Hastings, and also plans for transport in Battle, Rye and rural Rother. Its aim is to develop an effective, well managed transport infrastructure with improved travel choices, contributing to achieving the following high level objectives: improving economic competitiveness and growth; improving safety, health and security; tackling climate change; improving accessibility and enhancing social inclusion; and improving quality of life.
- 2.35. The waste and minerals planning strategy for East Sussex is set out in a series of documents collectively known as the Waste and Minerals Local Plan. The Waste and Minerals Sites Plan identifies specific areas of land where it is considered that the management of waste and production of minerals could take place in the future.

Adopted Local Policy

Rother District Local Plan Core Strategy (adopted September 2014)

- 2.36. The adopted Spatial Strategy for Rother district is set out in the Core Strategy, which plans for development to 2028. There are 5 overall spatial objectives within the Core Strategy, as follows¹¹:
- i. *To guide sustainable development and help build more sustainable communities, with a balance between homes and jobs;*
 - ii. *To maintain and enhance the character of settlements, the relationship between them and with their landscape settings;*
 - iii. *To give particular attention to promoting economic regeneration and growth for the Hastings/Bexhill area;*

¹¹ Core Strategy, page 30

- iv. *To give particular attention to supporting the 'market towns' roles and environmental qualities and settings of Battle and Rye;*
 - v. *To promote vital, mixed communities in the rural areas, whilst also giving particular attention to the distinctive characteristics of the High Weald AONB and the intrinsic value of the wider countryside.*
- 2.37. In support of the Core Strategy, Rother District and Hastings Borough Councils jointly commissioned a Strategic Housing Market Assessment (SHMA) Update in June 2013. For Rother, this identified a need for 6,180 net additional dwellings over the plan period (to 2028) to meet the demographic trend-based assessment of housing need. A joint Employment Strategy and Land Review (2008) and Update (2011) identified a need for 100,000 sqm of business floorspace across Rother District over the plan period.
- 2.38. Having regard to factors including environmental constraints, the Core Strategy concludes that an appropriate overall target for net additional housing in the district over the plan period should be at least 5,700 dwellings (or an average of 355 dwellings per year). A higher figure was found to be unsustainable for 2 main reasons: that the potential for housing growth at Bexhill is as much as is likely to be achievable in housing market terms; and the likely impact of further growth elsewhere on environmental designations, most notably the High Weald National Landscape (NL).
- 2.39. The Core Strategy determined the distribution of development by looking at local circumstances across the district against the backdrop of strategic issues. It gives particular regard to the role of settlements in terms of seeking to locate most development in locations that offer a range of employment, services and facilities – thereby supporting community life and existing services while also providing opportunities to reduce the need to travel by car and maximising the use of existing facilities and infrastructure and thereby reducing the need for new ones. It also acknowledges, however, that service provision is only a starting point and that some larger settlements are unsuited, mainly for environmental reasons, for higher levels of growth and that other smaller settlements may benefit from growth to ensure their continued sustainability.

- 2.40. For Bexhill, the Core Strategy finds the need for it to regenerate economically, proposing a level of growth that does not undermine the key local objectives to improve the balance of homes and jobs and to retain the town's "sense of place". The degree of growth at both market towns of Battle and Rye was found to be moderated due to the high environmental factors that bear upon them, notably their historic form, landscape setting, and at Rye, adjacent international nature conservation designations and flood risk areas.
- 2.41. The Core Strategy identifies some potential for growth in the Hastings Fringes, although a large-scale site at Breadsell Farm was not included in the Hastings Planning Strategy and therefore an adjoining site at Rother could only be considered a potential longer-term prospect. Development in rural areas was set at a level which allows for limited growth, reflecting individual settlements' needs, opportunities and service provision, while at the same time maximising the contribution that additional housing within villages can make to sustainable growth without prejudicing the individual character and amenities of villages, as well as those of their shared, for the most part High Weald AONB, landscape setting.
- 2.42. The development targets and the overall spatial strategy is set out in Policy OSS1 of the Core Strategy:

The Strategy for the Overall Spatial Development is to:

- (i) Plan for at least 5,700 dwellings (net) in the district over the period 2011-2028;*
- (ii) Plan for at least 100,000 square metres of gross additional business floorspace;*
- (iii) Identify suitable sites in accordance with the following spatial distribution:*
 - (a) Focus new development at Bexhill, giving particular attention to promoting economic regeneration and growth of the Hastings and Bexhill area, including through mixed use developments;*
 - (b) Provide for some development in Battle and Rye that helps maintain their small market town roles and is consistent with their respective environmental constraints and settings;*
 - (c) Facilitate the limited growth of villages that contain a range of services and which contributes to supporting vibrant, mixed rural communities, notably in relation to service provision and local housing needs, and is compatible with the character and setting of the village;*

(d) Allow for small-scale infill and redevelopment, and otherwise enable local needs for housing and community facilities to be met, in other villages; and
 (e) Give particular attention to the ecological, agricultural, public enjoyment and intrinsic value of the countryside, and continue to generally restrict new development to that for which a countryside location is necessary or appropriate to promoting sustainable land-based industries and sensitive diversification, primarily for employment uses.

2.43. The distribution of development is set out in Figure 1:

Figure 1: Approximate Development Levels, as set out in the Core Strategy (2014)

Approximate Development Levels 2011 - 2028		
	Housing	Employment
Bexhill	3,100 dwellings	At least 60,000sq.m.
Hastings fringes	100-250 dwellings	At least 3,000sq.m.
Battle	475-500 dwellings	At least 10,000sq.m.*
Rye	355-400 dwellings	At least 10,000-20,000 sq.m.
Villages	1,670 dwellings	At least 10,000sq.m.
Total	At least 5,700 dwellings	At least 93,000 – 103,000sq.m.

2.44. In calculating the housing growth levels, the Core Strategy makes an allowance for windfall developments of between 45 and 47 dwellings a year. This has had regard to the strong track record in Rother of both large and small windfall sites coming forward which have made a significant contribution to housing numbers in past years.

2.45. Development boundaries around settlements are maintained through the Core Strategy, as a way of focusing development and investment into sustainable locations.

2.46. The spatial strategy for the rural areas, set out in the Core Strategy, was informed by the Rural Settlements Study (RSS) Background Paper which appraised some 50 villages across the district. The RSS defined key “service centres”, as set out in Figure 2:

Figure 2: Rural Function of Settlements, as set out in the Core Strategy (2014)

Rural Service Centres	Robertsbridge
	Ticehurst
Local Service Villages	Burwash
	Hurst Green
	Sedlescombe
	Northiam
	Westfield
	Peasmarsh
	Catsfield

- 2.47. Following consideration of different spatial distribution options, the identified spatial development option for the villages in the Core Strategy is “to primarily focus on the service centres” whilst taking account of other factors including local needs, accessibility, environmental factors, local opportunities and whether growth levels are proportionate to settlement size over the course of the plan period. Therefore, the rural function of settlements as set out in Figure 9 of the Core Strategy is not the sole criteria governing the spatial pattern of development. This option was chosen because it is mindful of existing settlement patterns, of where population growth may best be served by a full range of businesses and facilities, and where they may in turn benefit economically from additional residents.
- 2.48. In terms of the rural economy, the Core Strategy finds that the occupancy rate of business space in the rural areas is comparatively high, and that at least 10,000 sqm of net additional business floorspace is required, preferably within or at least well-related to existing village development boundaries. The type of employment floorspace needed includes small workshops and office units, through sensitive expansion/ intensification of existing sites or as part of new mixed-use developments. The re-use or re-build of former agricultural buildings collectively provide an important source of business space in the area. The Rural Settlements Study identified a number of villages which appear to have a particular need for employment floorspace, as detailed below:

Figure 3: Villages Demonstrating a Particular Need for Employment Floorspace, as set out in the Core Strategy (2014)

Settlement	
Broad Oak	Peasmarsh
Camber	Robertsbridge
Hurst Green	Sedlescombe
Icklesham Parish	Ticehurst / Flimwell area
Northiam	Westfield

Rother District Development and Site Allocations Local Plan and Neighbourhood Plans

- 2.49. In line with the requirements of the Framework and as detailed above, the Core Strategy sets out strategic policies, including a housing requirement figure for the district and within this overall requirement, a housing requirement for designated neighbourhood areas. The Core Strategy also sets out strategic business floorspace figures. These strategic policies are implemented locally through the Development and Site Allocations Local Plan (adopted 2019) and the 6 “made” Neighbourhood Plans (Battle, Crowhurst, Rye, Salehurst and Robertsbridge, Sedlescombe and Ticehurst), which set local development policies and identify and allocate specific sites to accommodate the quantum and type of development identified through the Core Strategy.

3. Strategic/Corporate Policy Framework

Corporate Plan

3.1. The new Rother Corporate Plan (2020-2027) was adopted by Full Council on 5 July 2021. The Corporate Plan provides the strategic direction for the Council and shapes the work programmes and service plans of officers throughout this time period. It sets out 10 priority objectives. Those of particular relevance to the development strategy of the new Local Plan include:

- *To establish and deliver a plan to ensure Rother District Council is carbon neutral by 2030.*
- *Increase the supply of affordable homes throughout the district.*
- *To bring Rother above a 5-year housing land supply by the end of 2023.*
- *To lift the average indexed wage in Rother District from the bottom of the national league table by end 2023.*

3.2. In respect of the 5 year housing land supply aim, one action to achieve the aim is:

Deliver a new Local Plan 2019-2039 with policies that:

- *Speed up the overall planning process.*
- *Incentivise delivery of smaller sites.*
- *Create an environment of certainty for developers.*

Strategy Documents

3.3. Rother District Council has declared a Climate Emergency with the ambitious target of being carbon, and other noxious gas, neutral by 2030. The Rother Environment Strategy 2020-2030 was adopted in 2020. It identifies a number of Strategy Priorities to contribute to meeting the Carbon Neutral target. Those of particular relevance to the development strategy of the new Local Plan include:

1. **Becoming a smart digital district.** Among other measures, this includes improving digital connectivity, including the rollout of 5G to support changing working patterns that enable environmental improvements.

2. Green economy. In a green economy, growth in employment and income are driven by public and private investment into such economic activities, infrastructure and assets that allow reduced carbon emissions and pollution, enhanced energy and resource efficiency, and prevention of the loss of biodiversity and ecosystem services.
3. Air quality and sustainable transport. Under this Priority the Strategy makes a number of pledges, including: working with partners to improve the standard, environmental impact and frequency of public transport as well as promoting its use; reducing the need to own or use a car through managing developments in the Local Plan; and ensuring walking and cycling friendly development is encouraged through Planning Policy.

4. Facts and Figures

Key Facts for Rother

Population and household change¹²

- 4.1. Rother's population is growing and ageing. Between 2008 and 2018, Rother's overall population increased by 6.14%. However, the number of residents in Rother aged 65 and over increased by over 22% in the same time period, while the number of Rother's 30-44 year old residents decreased by 14% (this compares to the national figure of a 1.7% decline of the 30-44 age group). Trend-based population projections (2019-2039) find that the overall population will continue to increase, with the increase in residents aged over 75 particularly great, but also that numbers in the younger age groups (with the exception of those aged 45-64) will increase, albeit to a lesser degree.
- 4.2. Dwelling-based calculations predict that the number of households in Rother is set to increase by 13.1% between 2019 and 2032. The average size of household, which is already low compared to the national average, is expected to reduce by 4.2%.

Current position - housing and employment floorspace: delivery and supply¹³

- 4.3. As noted in Section 1 above, the Core Strategy set a target for the delivery of at least 5,700 new homes between 2011 and 2028, which gave an annualised target of 335 new dwellings per annum, and a target of 100,000 sqm of additional employment floorspace between 2011 and 2028, equivalent to 5,882 sqm per annum.
- 4.4. Net housing delivery within the District totalled 175 dwellings in 2020/21. This is significantly lower than previous years and is predominantly due to the COVID-19 pandemic. When combined with the considerable uplift to the housing figure, it means the Council is only able to identify 2.89 years of housing supply. However,

¹² Source: Sustainability Appraisal/Strategic Environmental Assessment Scoping Report in support of the Rother District Council and Hastings Borough Council Local Plan Updates (2019-2039), Appendix 3 and 4, April 2020.

¹³ Source: Local Plan Monitoring Report, Dec 2021.

while housing completions since 2011 have been below the annualised average level, this was anticipated due to the delay in the construction of the Link Road and the consequent delay in the strategic land releases at North East Bexhill that were contingent upon it. It is a feature of the development strategy that the major releases in North East Bexhill will give a significant boost to housing (and business space) delivery. The 2021 Housing Land Supply position statement therefore shows that by the end of the current plan period in 2028, there is forecast to be some 6,407 dwellings built within the district, exceeding the Core Strategy target of 5,700.

- 4.5. In 2020/21, gross employment floorspace completions totalled 1,723 sqm. This is again lower than recent years and, while the COVID-19 pandemic may have had an effect, there were large amounts of open-air storage (use class B8) implemented over the past two years. While net employment floorspace completions since the start of the plan period have been relatively low (2,332 sqm per annum), gross employment floorspace completions have averaged some 5,165 sqm per year, which is not significantly below the annualised average level of 5,882 sqm required in the Core Strategy. Overall, the district is on track to meet the development target of at least 100,000 sqm additional employment floorspace, as set out in the Core Strategy.

Affordability ratio¹⁴

- 4.6. The affordability ratio in Rother has steadily increased from 9.33 in 2011 to a high of 11.61 in 2018, before falling back slightly to 10.92 in 2020. This upward trend is problematic as it demonstrates that house price growth is outstripping wage growth, ultimately making housing more unaffordable for those who live and work within the district and potentially pricing out future buyers. This is demonstrated by the fact that wage growth rose by 27.3% between 2011 and 2020, while lower quartile house prices in the district increased by 49.0% over the same period.

¹⁴ Source: Local Plan Monitoring Report, Dec 2021.

Environmental factors¹⁵

- 4.7. 82% of Rother district is designated as ‘Area of Outstanding Natural Beauty’ (AONB), while a further 7% of the district not in the AONB is either nationally or internationally designated for its nature conservation value.
- 4.8. The Pevensey Levels straddling the south western boundary of the district is a ‘Ramsar’ site, designated for its international importance as a wetland habitat. In the south east of the district, a ‘Special Protection Area’ (SPA) between Dungeness and Pett Level is of European importance for wild birds, while an area between Dungeness and Winchelsea Beach is designated as a ‘Special Area of Conservation’ (SAC), in recognition of its flora and fauna. In addition there are significant areas between Dungeness and Pett Level, including parts of the East Guldeford Levels, designated as a Ramsar site. There are also a number of Sites of Special Scientific Interest (SSSIs) in Rother, and some 15% of the district is covered by Ancient Woodland
- 4.9. The low-lying and coastal nature of the district makes it particularly vulnerable to flooding. The predominant key flood risk comes from the sea, although the majority of the coastal perimeter benefits from flood defences which help reduce the threat of flooding within the district. However, the effects of climate change will further increase flooding risks.

Transport and Accessibility

- 4.10. Road travel: Strategic accessibility within the district is relatively poor, particularly in terms of journey times to London and access to regional centres such as Gatwick, Ashford and Brighton. The main strategic road network that serves the district consists of the A27/A259 corridor along the south coast and the A21 linking Hastings and the eastern part of Rother district to the M25, London and beyond. The lack of efficient strategic road infrastructure has impacted on the economic competitiveness of Rother and Hastings and has brought about relatively low levels of inward investment compared to the rest of the South East.¹⁶

¹⁵ Source: Rother District Local Plan Core Strategy, pages 12-13

¹⁶ Source: Rother Infrastructure Delivery Plan, March 2019

- 4.11. Rail travel: The main economic and population hubs along the East Sussex coastal strip are linked by the East Coastway route which also connects to the regionally important centres of Gatwick and Brighton and onto Ashford with its high speed rail link into London and onto mainland Europe. However, connections to London are strategically the most significant in the district, dominating local commuter patterns. The rail network and standard of train services in the county are severely restricted by shortcomings in the infrastructure; for example, sections of single track, inadequate signalling, and routes which cannot accommodate electric trains. Services are also limited by capacity restraints on the approaches to the London termini.¹⁷
- 4.12. Public transport: There are 2 rail routes in Rother: the coastal line which links Ashford, Rye, Hastings, Bexhill, Eastbourne and Brighton and includes limited services at rural stations along its route; and the London line which links Hastings, Battle, Robertsbridge and Etchingam to Tunbridge Wells and London, and again, includes services at rural stations along its route. There are bus services across much of the rural area but in the vast majority of cases these are limited, with few/infrequent services per day and little or no services in the evenings or at weekends. Bus services are more frequent in Bexhill and between Bexhill and Hastings.
- 4.13. Walking/Cycling: While pedestrian infrastructure in the urban areas and larger settlements is generally good, there are few designated cycle routes in the district. The fast speeds of traffic combined with the lack of infrastructure are likely to discourage people from cycling and walking longer distances in the rural areas and between settlements. Topography and the dispersed nature of settlements is also likely to be a factor affecting use of these travel methods.

SA/SEA Scoping Report Indicators

- 4.14. There are a wide range of indicators listed under 10 topic areas in the Sustainability Appraisal (SA). Those of relevance to the development Strategy include:

¹⁷ Source: Rother Infrastructure Delivery Plan, March 2019

- The percentage of Rother residents able to access services within 30 minutes by using public transport / walking: this is generally **declining**.¹⁸
- The percentage of Rother residents able to access services within 15 minutes of public transport / walking – urban areas: this is also generally **declining** although there has been some improvement in access to food stores.¹⁹
- The percentage of Rother households who are able to access open and green space²⁰: 33% of households have an accessible natural greenspace, of at least 2 ha in size, no more than 300 metres (5 minutes' walk) from home. 53% of households have at least one accessible 20 ha site within 2 km of home and 14% of households have at least one accessible 100 ha site within 5 km of home.
- The number of businesses²¹ and business survival rates²², together with tourism business turnover and visitor numbers²³ – these are generally **deteriorating**.
- Mode of travel to work²⁴: while there is currently no more up to date data than the 2011 census, this showed 68.8% of working Rother residents travelled to work using a private vehicle, 8.9% used public transport and 12.1% walked or cycled.
- Distance travelled to work²⁵: The 2011 census showed the greatest proportion of working Rother residents (19.1%) travelled between 10 and 30km to their workplace, although 17.2% worked at or from home and 15.3% travelled less than 2km. The table at Figure 4 below shows the level of commuting into and out of Rother, showing that more people commute out of the District for work than in, although a greater proportion of Rother residents live and work in the district:

Figure 4: Commuting Flows in Rother. Source: 2011 census

Live and work in district	Out-commuters	In-commuters	Net commuting
18,313	-15,077	9,593	-5,484

¹⁸ As of 2019. Source: Local Plan Monitoring Report, Dec 2021.

¹⁹ As of 2017. Source: Local Plan Monitoring Report, Dec 2021.

²⁰ As of 2021. Source: Local Plan Monitoring Report, Dec 2021.

²¹ As of 2021. Source: Local Plan Monitoring Report, Dec 2021.

²² As of 2019. Source: Local Plan Monitoring Report, Dec 2021.

²³ As of 2017. Source: Local Plan Monitoring Report, Dec 2021.

²⁴ Source: East Sussex in Figures.

²⁵ Source: East Sussex in Figures.

- Working age people with access to employment centres²⁶. The table at Figure 5 below shows the percentage of the working age population, aged 16-74, who have access to employment centres with 100 to 499 jobs within 15 minutes using different modes of transport including walking/public transport, cycling and car, both within Rother and East Sussex. This shows that the situation with regard to access to employment centres in Rother by sustainable transport methods is worse, compared to the county as a whole.

Figure 5: Percentage of working age population with access to employment centre within 15 minutes journey time. Source: Department for Transport, Journey Time Statistics.

	Walk	Public transport/walk	Cycle	Car
East Sussex	77.1	81.3	89.7	99.5
Rother	66.9	72.4	80.3	98.5

²⁶ As of 2019. Source: East Sussex in Figures.

5. Evidence

Standard Method Housing Figure

- 5.1. Using the calculation for the standard method for housing need, as set out in the Planning Practice Guidance, Rother's need is identified as 740 dwellings per annum as of 1 April 2021. This is more than double the figure identified in the Core Strategy (335 dwellings per annum), which itself has not yet been achieved (in terms of numbers of dwelling completions) at any year during the plan period. Since the start of the Core Strategy plan period in April 2011, there have been 1,979 net additional dwellings completed in the district as of 1 April 2021. This is an average of 198 dwellings per year.

Rother and Hastings Housing and Economic Development Need Assessment Study (HEDNA)

- 5.2. Rother District and Hastings Borough Councils jointly commissioned a Housing and Economic Development Need Assessment Study (HEDNA) in 2020²⁷. Its purpose is to assess future development needs for housing (both market and affordable) and employment across the Hastings and Rother area. It forms part of the evidence base which the Councils will use in preparing and updating their respective Local Plans. The document does not set the housing target for the local authorities but provides the evidence to inform its starting position. It provides an assessment of housing need, based on Government guidance at the time of writing, which is intended to provide input to plan-making alongside wider evidence including on land availability, environmental and other development constraints and infrastructure.
- 5.3. As required, the methodology used in the HEDNA to calculate housing need accords with the standard methodology set out in the Framework and PPG. The HEDNA finds that if the housing need (as calculated using the standard method) were to be achieved in Hastings and/or Rother, increases in both in-migration and household formation, compared to current levels, can and should be expected.

²⁷ Housing and Economic Development Need Assessment prepared by GL Hearn with Justin Gardner Consulting, 2020.

- 5.4. In respect of employment forecasts, the HEDNA notes that the baseline forecast produced by Oxford Economics indicates that the Rother economy is expected to grow by 1.7% per annum (GVA growth pa) between 2019 and 2039. The total number of jobs growth forecast is 2,668 which equates to an annual growth rate of 0.4%. For both Hastings and Rother, the baseline forecasts indicate the sectors of construction and healthcare are predicted to grow substantially in terms of jobs, whereas jobs in manufacturing and public administration are set to decrease by 2039 in both areas. However, these baseline forecasts are largely driven by regional and national trends and do not reflect local investment or planned growth. The Study therefore considered adjustments to the forecasts to reflect this, focused on improvements in the manufacturing and creative industries, following feedback from a range of local stakeholders and data analysis. Under the “local scenario”, losses are forecast in manufacturing, wholesale and retail in both areas although manufacturing losses are restricted. The adjusted local scenario for Rother results in additional employment growth from the Baseline Scenario (2019-39), taking the total jobs growth to 3,158. The Study suggests that the revised “local scenario” should be used in Hastings and Rother when arriving at employment forecasts as it considers local conditions indicated by stakeholders along with recent historic trends.
- 5.5. The Study uses a number of assumptions to model economic growth and how this may influence the level of housing need and also what level of jobs could be supported through the standard methodology. This finds that in Rother, the equivalent of an additional 7,697 economically active persons would be added to the population over 2019-2039, should the housing numbers calculated under the standard method be achieved. However, the number of additional jobs that can be expected to form over the same period, under the “local scenario” detailed above, is only 3,158 over the same period. A similar situation applies in Hastings. It is therefore concluded that neither local authority requires any additional homes above the standard method to support their economic growth.
- 5.6. The Study uses the same assumptions in reverse, to model how many homes would be required to support the forecasted economic growth. Under the local growth scenario, this results in a housing need of 495 dwellings per annum for Rother. While this is the number of homes required to support the local economy, the Study stresses that this is not to be used as a robust definition of housing need (but

is an indicator of how jobs growth can be linked to housing need). As required by the NPPF, the Objectively Assessed Need (OAN) should remain those set out by the standard methodology. The Study also notes that this economic-led need does exceed the recent delivery rates of housing and therefore, population may be a constraint on economic growth if delivery rates are not increased.

- 5.7. The Study also considers the housing market. It finds, having regard to historic under-supply of housing, affordability and other factors, that the evidence does not support a further uplift on the demographic needs as a result of market signals for the local authorities, as this is already addressed in the standard method (i.e. market signals do not suggest that additional housing, above that calculated through the standard method, is required).
- 5.8. In respect of employment land requirements, the Study summarises the demand and supply balance for Rother as follows²⁸ in Figure 6. It finds that in order to fulfil the market needs and wider regeneration aspirations of Hastings (where the shortfall in floorspace is greater) and Rother, there is a need to provide occupier space and sites that can encourage growth and development in the economy. The key market gaps are smaller and large industrial units as well as small business and creative space, with existing premises offerings for the latter providing a good blueprint for future development.

Figure 6: Demand and Supply Balance for employment land in Rother

Use Class / Type	Supply		Need	
	Sqm	Ha	Sqm	Ha
Office inc Bexhill Ent. Park	37,074	8.5	21,000	7.0
Industrial (smaller sites)*	14,915	3.7	66,100	22.0
Industrial (larger sites)**	48,081	12.0		
Total	100,070	24.4	87,000	29.0

Rother District Council Settlement Study

- 5.9. The Settlement Study considers the District's existing spatial development strategy and brings together an assessment of the physical constraints along with the order,

²⁸ HEDNA table 110.

function and sustainability of built up areas across the District. Its starting point and key purpose is to consider from a fresh perspective how settlements function, building on but not necessarily replicating, the principles of the Council's previous settlement hierarchy study in support of the Core Strategy. A secondary purpose of the study is to analyse the physical and environmental constraints that may affect the capacity for a settlement or area of built form to grow.

- 5.10. Ultimately, the Study helps the Council to consider opportunities for new, or extensions to existing, settlements. This is achieved by analysing the existing sustainability of settlements and evaluating the opportunities to make locations sustainable to support future growth. The methodology for the assessment divides the study into four main stages: (1) Identification of settlements to be assessed; (2) Desktop assessment of the physical and environmental constraints of each settlement; (3) Assessment of the provision of services, facilities, infrastructure and accessibility of each settlement; and (4) Conclusion on the role and function of each settlement, the settlement area and population and each settlement's designation within a network of settlements for the District. The Study has been informed by consultation with Local Members and Town and Parish Councils.

Rother District Council's Draft Housing and Economic Land Availability Assessment

- 5.11. A draft Housing and Economic Land Availability Assessment (HELAA) is being undertaken, as required by the Framework and PPG. Its main purpose is to identify specific sites/broad locations which are available, suitable and achievable for housing and/or economic development during the Plan Period and assess the quantum of development those sites could accommodate. The HELAA will be critical evidence in helping to determine the level of housing development that can be accommodated and whether the Standard Method Housing Figure can be achieved. Furthermore, together with the Settlement Review Study, it will assist in identifying areas where development can be accommodated and where existing settlements can be expanded or changed to accommodate further or different forms of development.

East Sussex Gypsy and Traveller Accommodation Needs Assessment

- 5.12. A Gypsy and Traveller Accommodation Needs Assessment (GTAA) was undertaken in line with the Planning Policy for Traveller Sites (PPTS) (DCLG, 2015). Rother District Council worked together with the other East Sussex Local Planning Authorities to produce a County-wide Assessment.
- 5.13. The PPTS requires Local Planning Authorities to use a robust evidence base to establish accommodation needs of Gypsies, Travellers and Travelling Showpeople, to inform the preparation of local plans and make planning decisions. Local planning authorities are required to set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities.

Transport Assessment

- 5.14. The Council has undertaken a joint East Sussex Transport Assessment in partnership with East Sussex County Council and all of the local planning authorities across East Sussex. Stage 1 of this assessment used spreadsheet analysis testing of a draft development option of sites, based on submitted sites to the Council's HELAA. Further testing will be undertaken on a more considered and detailed distribution of development based on the final outputs and recommendations of the Council's HELAA. This will be undertaken using the East Sussex Stage 2 'County-Wide Model' which has been developed alongside the Stage 1 assessment, and represents a more realistic tool in assessing the transport implications of growth.
- 5.15. Alongside this work, the Council also commissioned the same consultants to undertake a feasibility study for the new multi-modal transport link across the West Bexhill area to act as a link and service road to new development areas in the West Bexhill area. The recommendations of this report indicated that at this moment in time and for the purposes of the Local Plan period from 2019-2039 that a new link road was not deliverable. This is because the road is not considered feasible or viable at this moment in time, a consequence on the limited amount of growth that could come forward and be supported by CIL, the availability of funding streams, lack of political will and general support and general conflicts with the

Council's 'green to the core' priorities including Carbon reduction, for the new Local Plan.

Windfall Assessment

- 5.16. The Council has undertaken a windfall assessment to assess the potential future delivery of housing on windfall sites that have not been assessed as opportunities in the Council's draft HELAA. This relates to development on sites of less than 5 units and other types of sites such as redevelopments and change of use/conversion, that it is not possible to identify as the current use is operating and viable. The windfall assessment forms and appendix to the main draft HELAA report.

Net Zero Transport: The Role of Spatial Planning and Place-Based Solutions (Royal Town Planning Institute Research Paper, January 2021)

- 5.17. This RTPI Research Paper explores how different places can achieve an 80% reduction in surface transport emissions by 2030, as part of a pathway to net zero by 2050. Modelling within the Paper *“takes a place-based approach which prioritises measures which reduce the overall need to travel, followed by those which shift trips to active, public and shared transport, and finally those which switch vehicles to cleaner fuels.”*²⁹
- 5.18. In the modelling, *“a ‘do nothing’ scenario sees transport emissions increase. To avoid this, all new development should be located and designed to generate zero emissions from surface transport, and should enable carbon reduction in other places to achieve ‘carbon negative growth’. The planning system should also prioritise urban renewal that enables growth while achieving a substantial reduction in travel demand. This should focus on maximising the potential for local living by ensuring that most people can access a wide range of services, facilities and public spaces by walking and cycling. Increased home working, digital service delivery, and new forms of flexible work and community spaces will play a key role, alongside investment in place.”*³⁰
- 5.19. *“Residual travel demand should be shifted away from private vehicles to*

²⁹ Executive summary

³⁰ Executive summary

active, public and shared forms of transport, at a scale which significantly exceeds current UK best practice. Integrated transport networks should be accompanied by access and parking restrictions for private vehicles, creating liveable streets and ensuring that sustainable modes are always the most convenient and affordable choice.”³¹

The report finds that in an average local authority, transport is responsible for over a third of all emissions. While many Local Authorities (including Rother) have set ambitious “net zero” targets, delivery of solutions remains slow and there remains a major disconnect between these ambitions and the reality of much planning and placemaking which remains in many instances, car-dependant. *“Put simply, the planning system often appears to deliver the wrong type of development in the wrong place, and does not fully consider the impact of development on carbon emissions.”³²*

- 5.20. The study identifies and tests the impact of approximately 40 carbon reduction interventions in four ‘place typologies’. These are typical of real places in England and elements of them are present within Rother. It finds that the ‘15 minute neighbourhood’ is one of the foundations upon which net zero transport networks can be built. *“The defining characteristic of the ‘15 minute neighbourhood’ is that people are able to ‘live local’ and meet most of their daily needs within a 15 minute walk or cycle from their home. This includes, for example, access to schools, grocery shopping and places to socialise, exercise and work... Providing access to affordable, integrated public transport and new forms of shared mobility is also vital. This ensures that sustainable modes are a viable and attractive option for the medium and longer distance journeys that are responsible for most surface transport emissions.”³³*
- 5.21. For each of the 4 place typologies, a spatial vision is set out, which explains the changes necessary to achieve an 80% reduction in surface transport carbon emissions. One of the place typologies, a rural county, is most relevant to the rural parts of Rother. A selection of the measures identified in the spatial vision are as follows³⁴:

³¹ Executive summary

³² Page 2

³³ Page 18

³⁴ Page 41

- Areas of growth are planned to achieve high levels of self-containment and facilitate local living from the outset;
- Space for home working is included in every new dwelling and co-working and administrative hubs planned for every neighbourhood;
- Car ownership is discouraged through the design of the public realm and the ‘decoupling’ of private parking from new home sales;
- Shared car clubs and demand responsive transport provide for journeys where active and public transport are not an option;
- Fast and direct connectivity between areas of growth and the largest trip generators in the nearby city is provided along strategic mobility corridors that prioritise public transport, active travel and multi-occupancy vehicles. Strategic corridors connect into an enhanced rural mobility network via existing towns and new multipurpose mobility hubs that provide social and community spaces alongside transport infrastructure;
- Secondary country roads have been repurposed as car-free ‘living lanes’ to facilitate safe cycling and walking;
- Digital upgrades to enable home working and online service delivery;
- Community owned energy networks are created to charge vehicles using locally generated electricity and generate revenue for further investment in local services and infrastructure.

Place-based approaches to climate change: Opportunities for collaboration in Local Authorities (Royal Town Planning Institute research paper, March 2021)

- 5.22. This RTPI Research Paper advocates for a place-based approach to the climate and ecological emergency, exploring how in-house collaborative working across local authority departments can deliver place-based approaches to the climate emergency.
- 5.23. It contends³⁵ that [what is now paragraph 11 (a) of³⁶] the NPPF “*has the potential to be a large hook for requiring local plans to demonstrate a settlement pattern compatible*

³⁵ Chapter 2

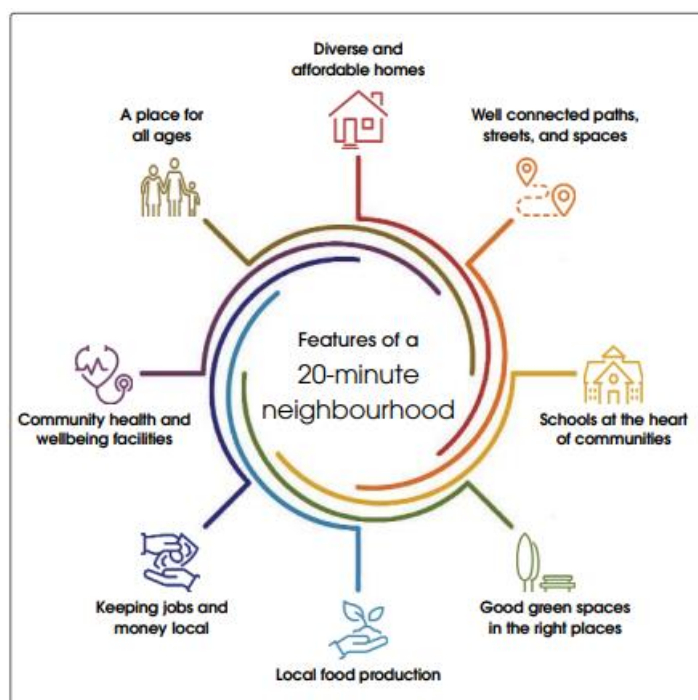
³⁶ NPPF paragraph 11 (a): *All plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects*

with net zero”. However, it finds that “despite a clear message on the need for climate adaptation and mitigation, the tension that exists within national planning policy between economic growth and achieving housing targets and delivering low-carbon, resilient development can lead to difficulty delivering ambitious local climate action.” Further, “It is no surprise that spatial planning is recognised by the Committee on Climate Change³⁷ as one of the biggest opportunities that Local Authorities have to deliver net zero, yet it continues to be undermined by viability and an overwhelming focus on housing numbers rather than building sustainable homes in the right location.”

20-Minute Neighbourhoods (Town & Country Planning Association, March 2021)

- 5.24. The TCPA Guide to 20-Minute neighbourhoods, encapsulates the potential outcomes in the following simple diagram:

Figure 7: Features of a 20 Minute Neighbourhood



- 5.25. The characteristics shown in the diagram (Figure 7) have been shown in existing areas to be part of the foundation of a thriving neighbourhood.

³⁷ The Committee on Climate Change (CCC) is the UK’s independent adviser on tackling climate change. Its purpose is to advise the UK and devolved governments on emissions targets and to report to Parliament on progress made in reducing greenhouse gas emissions and preparing for and adapting to the impacts of climate change.

- 5.26. The following 10 principles, taken from established, successful schemes, demonstrate that putting the concept into practice is complex and multi-faceted:
- a compelling vision, well communicated;
 - strong, inspiring leadership;
 - empowered communities;
 - research, data, and analysis;
 - partnership and advocacy;
 - addressing inequalities;
 - adopting policy;
 - investment;
 - 'hard' and 'soft' measures; and
 - evaluation and adaptation.
- 5.27. Section 4.3 provides advice on applying the 20 minute neighbourhood principles to villages and rural areas. It notes that issues such as poor broadband, inferior public transport, low employment opportunities and accessibility to services are particular to rural areas,
- 5.28. It advises that two different approaches to these issues are emerging:
- For market towns, the town itself becomes a complete 20 min Neighbourhood. People from nearby villages will need good transport links to travel to the town to use its services and once there, will be able to walk within the town to find all their everyday requirements.
 - For rural areas with small villages and no towns, the approach is to create a network of villages that collectively provide what people need on a daily basis, linked by active travel routes.
- 5.29. There are proposed frameworks supporting this approach e.g. Scotland's Fourth National Planning Framework embraces the 20 minute neighbourhood concept and a consortium called Velo-City, which won the National Infrastructure Commission's ideas competition in 2017 with a vision for village clusters linked by cycle routes.

Living Locally in Rural Wales (RTPI Cymru Discussion Paper, January 2022)

- 5.30. This paper explores the concept of living locally in rural Wales and considers whether the guiding principles behind the 15 minute neighbourhood model can be applied in more remote rural areas.
- 5.31. It finds that the principles need to be applied flexibly and suggests an additional principle to address ‘local productivity and enterprise’ – for example relating to agricultural diversification or support for local businesses to cater for the needs of the local community.
- 5.32. It advises that the adaptable nature of the concept of living locally means it can evolve to suit the individual place, taking into account the local context and what makes it distinctive.
- 5.33. It concludes that the elements of living locally in rural areas, relevant to rural areas, might include (but are not limited to):
- Continuing to focus housing development within established, well connected communities;
 - Developing digital infrastructure to support local productivity, services, enterprise and communities;
 - Improving sustainable and inclusive local bus and rail services;
 - Investing in active travel networks where suitable which provide connectivity to centres of services and public transport hubs; and
 - Encouraging investment and creative initiatives which focus support services in accessible centres, including post offices, banking services, community and public services.

20 Minute Neighbourhoods in Rural and Island Scotland: report from practitioner roundtable (Scottish Rural Action, Scottish Rural and Islands Transport Community and SURF, January 2022)

- 5.34. This report sets out the outcomes from a roundtable discussion on the application of 20 minute neighbourhoods to rural and island communities.

- 5.35. It concluded that the 20 minute method can be a useful conversation tool to support community-led place planning, enabling communities to explore what ‘living well locally’ means to them, but that unintended negative impacts are likely to arise when the method is applied as part of a top-down planning process, for example to shape Local Plans. This is because, they concluded, it risks exacerbating the centralisation of rural services and urban-centric narratives.
- 5.36. It concluded that the 20 minute neighbourhood concept could be reframed as a 30 or 45 minute neighbourhood in a rural context, with a strong narrative on ‘living well locally’ adopted in planning policy.

Building Car Dependency: The Tarmac Suburbs of the Future (Transport for New Homes, 2022)

- 5.37. Transport for New Homes is a Community Interest Company whose work combines visits to new housing developments with research into the planning and funding landscape behind them. It includes the Royal Town Planning Institute’s (RTPI) Infrastructure Specialist as a member of its steering group. This 2022 research report examines 20 new large-scale housing developments across England (although none in Sussex) to find out whether they are built around sustainable transport or the car. The size of the developments ranged from around 450 dwellings to over 5,000.
- 5.38. The report found that housing developments on brownfield sites in cities were generally far more suitable for those wanting to walk or cycle, and for those wanting to use public transport. By contrast, housing developments on large greenfield sites were places where residents would need a car. Their design and layout anticipated that residents would drive for nearly every journey they made, and this was evident in the internal road layout, the car access onto major roads with bigger junctions to take the traffic and the sheer quantity of residential car parking.
- 5.39. A big issue with new greenfield housing developments was found to be a lack of local facilities and small businesses within them, meaning a “walking community” was not established. Furthermore, green field housing was found to be

disconnected from existing urban areas rather than being connected to it by continuous and overlooked streets, meaning new residents did not visit or support existing town centres, contributing to the decline of these areas.

5.40. The report also found that private gardens in new greenfield developments were often small, and it contended that this was due to space being used instead for significant levels of private car parking.

5.41. New greenfield developments were also found to increase traffic locally:

Developer money is put to enlarging junctions and building new roads to ‘mitigate’ the effects of so much additional traffic and paradoxically the new roads and bigger junctions attract even more car-based sprawl.³⁸

5.42. The report considers the contribution that public transport makes to the sustainability of new greenfield housing developments, finding that supplying public transport to new and dispersed development divorced from a large urban area is difficult. Bus routes cannot be easily extended to serve developments and developers do not always design roads to accommodate buses. If a new housing area is designed around the car, and if buses are not in place from the moment that new residents move in, people simply get used to driving. Good bus ridership is then hard to achieve.

5.43. In terms of rail, the report identified many new housing developments being promoted on the basis of a small country station nearby which ‘just’ needs more frequent services and better access to provide a useful ‘sustainable link’, while other developments put forward the idea of new stations. However, the report found that it is almost impossible in England to deliver a more frequent railway service to a rural station to cater for a development, let alone open a new station. There are barriers at every stage, both procedural and financial, and there were very few examples where either had been achieved. The report also found significant difficulties in providing cycle routes, noting “*cycle routes to places stranded outside of an urban area are not easy to arrange for safe travel alone or in the dark. It was possible to cycle to some of the new greenfield estates but you take your life into your hands on*

³⁸ Page 11.

country roads and on the many large roundabouts and junctions, not to mention dual carriageways.”³⁹

- 5.44. The report makes a number of wide-ranging recommendations including changes to the design, density and layout of new developments to make them more “walkable”, include a mixture of uses and make public transport a central theme; changes to the NPPF; and more funding for public transport. It notes:

“Where we build is absolutely key. New homes need to be built in places which can be served by a modern public transport network and where residents are able to walk or cycle within the development and into and out of it to the adjacent urban area. Giving rural and semi-rural local authorities high housing targets of tens of thousands of new homes, when they have very limited public transport and a paucity of community provision or jobs in the area, makes little sense.”⁴⁰

Density Study

- 5.45. The Council have undertaken a density study to support the development of policies in the Local Plan. This includes an assessment of the prevailing densities across the district, looking at settlement areas and areas of similar built character. The assessment is further developed to look at the opportunity of density zoning across the district to support live well locally policies within the draft Local Plan.

³⁹ Page 14.

⁴⁰ Page 28.

6. Consultation and Engagement

Early Engagement Responses

- 6.1. As part of a program of Early Engagement on the direction of the Local Plan Update, the Council consulted its members, parish/town councils and other targeted organisations between August and October 2020
- 6.2. The following gives a snap-shot of objectives that respondents considered most important to Rother District:



- 6.3. Respondents were asked the following questions on housing:

Q5. How can the current plan be modified to increase the number of houses to be delivered whilst still ensuring we deliver sustainable development which is defined as balancing social, economic and environmental needs?

Q6. Should Rother be considering the creation of a new settlement by itself or with a neighbouring Borough or District? Please expand on your response with any potential locations.

Many respondents felt that the national prescribed standard methodology figure was neither achievable nor desirable. There was support for increasing housing

density through smaller dwelling types, and development of brownfield land. There was also some support for increasing the range of settlements which have housing allocations and making existing smaller settlements more sustainable by improving services. The number of respondents who supported larger scale extensions to Battle, Robertsbridge or North/West Bexhill was low.

A high number of respondents felt that the Council should consider the creation of a new settlement, although at the same time, a not insignificant number felt that this is not something the Council should consider. Many respondents felt that the AONB is a significant concern/barrier to a new settlement. A range of locations and suggestions were made in relation to a potential location for a new settlement but there was no general consensus.

6.4. On employment, respondents were asked:

Q7. Should growth be focused around existing employment areas and settlements with a range of services?

Q8. Should employment growth be linked to the future distribution of housing?

Responses to the first question were mixed. Just under half of respondents supported focusing growth around existing employment areas and settlements with a range of services, commenting on the sustainability benefits of this approach and its potential to protect the AONB. However, just under a quarter of respondents disagreed with this approach for a variety of reasons, including concerns with further development in larger settlements in the AONB; risk of neglecting smaller settlements; and a need to prioritise new employment opportunities rather than existing employment sites. Other comments were made including on the opportunities presented by an increase in home-working and better connectivity, small areas of growth being appropriate in rural areas to ensure they do not stagnate; and the importance of areas of growth (especially major employment sites) also having good infrastructure and transport links, including good cycle/walking routes.

There was a high level of support for employment growth being linked to the future distribution of housing, arguments for this approach included: to reduce travel requirements and avoid further imbalances in population profiles.

- 6.5. Respondents were asked about the likely impact of the COVID-19 pandemic on future working and shopping patterns. A large majority of respondents felt that there will be a permanent shift in how and where people work. Comments included: There will be less need for dedicated employment space and office bound jobs due to increased homeworking; there will still be a demand for employment workspace but buildings will need to be more flexible; there will be a need to provide support for people working at home and local businesses, including the provision of community hubs within town/village centres; there is a need for small, decentralised pepper pot-type provision of office space.

A large majority of respondents also felt that there will be a permanent shift in how and where people shop, comments included that there is now little need for building malls, large supermarkets, department stores etc; town centres may permanently decline; and that there may be a move towards shopping locally in rural areas, as well as a significant increase in home deliveries.

Working Groups

- 6.6. The Council attends a number of cross-authority working groups including a regular meeting of Local Plan Managers (involving representatives from the other East Sussex Local Authorities including the County Council); a county-wide Transport evidence group and other County wide topic based groups such as the Sussex Nature Partnership Network meeting.
- 6.7. Internally the Council has established a number of members working group to discuss the progress of the Local Plan, including looking at development opportunities within parish and ward areas and looking at the draft outputs of the HELAA process. Engagement has also taken place with key internal officers in other teams and departments, especially development management, economic regeneration and housing.

Duty to Cooperate

- 6.8. The Council co-operates with other local planning authorities (LPAs), statutory consultees and other bodies on planning issues that cross administrative boundaries, particularly in relation to strategic matters. Its adjoining LPAs within East Sussex are Hastings Borough and Wealden District, and within Kent: Tunbridge Wells Borough, Ashford Borough and Folkestone and Hythe District. The Council details its series of duty to cooperate meetings and engagement with stakeholders within the Early Engagement and Duty to Cooperate Statement, in support of the draft Local Plan.
- 6.9. The Council is committed to its duties in relation to the Duty to Co-operate, and in summer 2020 prepared a Duty to Co-operate Action Plan which outlines how and at what stage it intends to engage and consult with organisations on the development of the Local Plan. The Council has continued with its duties and is starting to implement Memorandums of Understanding and Statements of Common Ground with its partners to formalise strategic planning issues, agreements and working practices to support the preparation of the Local Plan.
- 6.10. Work with the neighbouring borough of Hastings is particularly important, having regard to the close linkages between the areas including in terms of housing and employment markets. Rother District Council and Hastings Borough Council have worked together in commissioning a joint Housing and Economic Development Need Assessment (HEDNA) study. In addition, both Councils jointly prepared a Sustainability Appraisal/Strategic Environmental Assessment Scoping Report which underwent consultation in the summer 2020. This has resulted in a joint approach to the SA Framework that will be used to assess the development of planning policies in respective Local Plans. As Hastings Borough Council are more advanced in the preparation of the Local Plan, the Councils will move forward with separate final Sustainability Appraisal Reports. The Councils continue to work closely together to discuss synergies in our Local Plans and share findings of our evidence base.

7. Key Issues

Issues to be addressed in the Local Plan

- 7.1. The Council's development strategy is key to delivering the wider spatial objectives of the Plan and is critical in facilitating the delivery of residential and commercial growth across the District. It is important that it strikes the right balance between delivering residential and commercial growth whilst respecting the environmental quality of the District. The strategy will also need to respond to sustainability issues, such as improved connectivity, and wider economic gains. These are drawn out in the assessment of spatial development options, through the sustainability appraisal.
- 7.2. The development strategy, because of its strategic importance, will relate to a number of key issues that the Local Plan will seek to address. The following key planning issues, which relate to the development strategy, will be drawn out in the Local Plan:
- Delivering carbon reduction and adaptation to Climate Change, and satisfactorily responding to the locally declared 'Climate Emergency';
 - Conserving the significant environmental quality across the District alongside delivering biodiversity gains and improvements to green infrastructure;
 - Meeting the overall local demand and need for housing (including affordable and specialist need) – balanced against the physical and environmental constraints across the District;
 - Securing economic improvement in a challenging local and national economic cycle that requires ongoing flexibility;
 - Planning for physical and mental health and wellbeing by supporting strong, safe and sustainable communities, with a community led focus, promoting healthier lifestyles, reducing inequality and responding to the requirements of a joint Memorandum of Understanding with East Sussex County Council's Healthy Places team;
 - Delivering strategic and local infrastructure to support growth, and to strengthen the sustainability of settlements and communities;

- Maintaining safe places to live, with better accessibility to all members of the community;
- Planning for an ageing population, responding to the needs for adaptable homes and range of accommodation needs;
- Providing better access to jobs, services and facilities across the District, and specifically supporting rural economies and communities; and
- The ability to manage uncertainties and contingency planning, including long-term climate change resilience.

8. Vision and Spatial Objectives for the Local Plan

- 8.1. The draft Local Plan has two overall priorities – to be Green to the Core and to Live Well Locally. Being Green to the Core means mitigating and adapting to the Climate Emergency through both shaping places to contribute to radical reductions in carbon emissions and planning for long-term climate change adaptation.

Local Plan Vision

- 8.2. The Local Plan contains a draft vision, which describes how the District will look by the end of the planning period in 2040. The vision describes how the District will be a *'more beautiful and sustainable place to live'* and *'meet the needs of its local community'*. The vision then goes on to state that *'the Local Plan will proactively address the Climate Emergency through policies which locate development in the right places, requires carbon neutral developments and increases carbon sequestration'*.
- 8.3. It also states that *'sensitive, sustainable and well-designed development that meets the local housing and employment needs'* will be delivered and that quality of life will be *'enhanced through creating safe, balanced and inclusive communities'*. In order to achieve these aspects of the vision, the Council must develop a spatial development strategy that is sustainable and ensures that quality of life, especially for its residents can be enhanced.
- 8.4. The draft Green to the Core chapter of the Local Plan identifies that Rother can most successfully contribute to radical reductions in carbon emissions by, amongst other things, enabling people to 'live well locally', through access to jobs, services and facilities by public transport, cycling and walking.
- 8.5. Living Well Locally is a variation of the 20 minute neighbourhood concept and the draft policy approach is to *'reshape Rother's pattern of development through a landscape-led approach which will reduce the distances between homes, facilities, services and jobs; make efficient use of infrastructure networks; promote sustainable mobility to reduce transport emissions; encourage economic participation and improve health and well-being'*.

- 8.6. It is therefore important that the proposed spatial development strategy is in direct synergy with the Local Plan's overarching priorities and vision. The aspects of the vision drawn out above are key areas which are assessed through the sustainability appraisal and as such, using this as a tool to identify the most sustainable options, will ensure they are compatible.

Spatial Objectives

- 8.7. Whilst the spatial development strategy could be considered to relate to all of the proposed spatial objectives of the Local Plan, it is considered there are greater synergies with the six listed objectives below. It is recognised by the Council that maintaining the environmental quality of the District, and being 'green to the core' is an overall priority of the Local Plan. However, the following draft spatial objectives, are more directly related to the delivery of a sustainable development strategy for the District:
- **Objective 4** - Help facilitate the delivery of all types of housing, ensuring a variety of high quality dwellings that meet the needs and income levels of Rother's wider population for their lifetime
 - **Objective 5** - Deliver sustainable growth and regeneration in Bexhill and the Hastings Fringes, along with supporting infrastructure, contributing to the needs of the wider housing and economic market area
 - **Objective 6** - Create economic prosperity, both in rural and urban locations, meeting the employment needs of the wider population, improving the quality and variety of jobs, and being flexible to the changing needs of the economy
 - **Objective 7** - Focus growth in sustainable locations across the District, or places that can be made sustainable through supporting infrastructure and community facilities
 - **Objective 8** - Enhance the sustainability and connectivity of local communities through sustainable transport measures and improved internet network coverage; and
 - **Objective 9** - Support and achieve safe, healthy, vibrant and mixed communities where the physical and mental health of residents is a high priority. Create high standards of inclusivity and accessibility to shared facilities for all the District's residents.

9. Policy Options

Spatial development options

9.1. This paper considers the different options for growth within the Local Plan period. It is important that both palatable and unpalatable options are considered and appraised at an early stage, before they are discounted. The development of options was undertaken internally, with reference to the evidence base being prepared to support the Plan, and considered the following factors:

- The existing distribution of settlements across the district and their scale and importance;
- The district's transport network and the connectivity and interaction between settlements in relation to accessing services and facilities;
- The development potential outside the High Weald AONB;
- Opportunities for new settlements, or significant extensions to existing settlements; and
- Opportunities for development on the edge of the District boundary where it is close or adjacent to other settlements.

9.2. A starting point for the consideration of options, is the current distribution of settlements across the district. It is possible to develop a strategy linked to the current size, form and function of each settlement and their potential to grow in line with past trends. This leads to two options which direct proportional growth:

- (i) **according to the existing population of settlements** – in this way existing large settlements would continue to grow at higher rates, and smaller settlements would only have limited growth. This option has only been assessed in principle without considering the physical or environmental constraints related to each settlement;
- (ii) **according to the form and function of each settlement** – through establishing a hierarchy where each settlement is defined as a large town, smaller town, larger village etc and the level of growth is based on the hierarchy. Again, this option has only been assessed in principle without

considering the physical or environmental constraints related to each settlement;

9.3. The next set of options relates to the interaction of communities between settlements across the District. This is a consideration of each settlement's proximity to neighbouring settlements, the services and facilities they share, and their transport links. It is possible that transport networks could be improved in a sustainable way through focussed growth. Two potential options are considered, as follows:

- (i) **Village Clusters** – The residents of villages in Rother rely on the services and facilities of larger places, and their transport options, such as train stations. Whilst conceptual at this stage, there is an opportunity to enhance connections between settlements to create networks where sustainable modes of transport improve accessibility and connectivity. There are two potential clusters centred around Rye and Battle, and there are opportunities to improve connectivity between the settlements through sustainable modes, in order to facilitate growth and improve the sustainability of these communities;
- (ii) **Radial Settlement Connections to Bexhill and Hastings** – To the south of the District, Bexhill is the District's major town and there are a number of smaller settlements in close proximity whose residents will use its facilities and services. This includes areas outside of the District on the eastern edge of Wealden District. This is the same principle for Battle, but due to its proximity to Bexhill and Hastings there may be some cross-over with the same settlements. The Council considers that Hastings, outside the District's boundary is of key importance as settlements that surround its urban edge will travel radially into Hastings for its services and facilities. The principle of this option is that there are opportunities to focus growth in settlements that are served radially by these three larger towns, and that improvements can be made to ensure better sustainable modes of transport;

9.4. The next consideration is options for the growth of existing settlements in physical terms through brownfield intensification, and focused greenfield growth at the edge of the existing settlements. This paper specifically considers the opportunity for

significant growth in the North and West Bexhill area, as Bexhill is the District's largest settlement and a key area of search.. The development options considered through brownfield intensification and greenfield growth are as follows:

- (i) **Sustainable Settlement Growth** – Using the findings of the Council's Settlement Study to determine the most sustainable settlements where the development of settlement extensions can be delivered in a sensitive way. This option is to be considered in principle only at this stage and the scale and amount of development will be determined and evidenced by the HELAA;
- (ii) **Bexhill Greenfield Growth** – Bexhill is the largest settlement in the District with the greatest range of facilities and services. It is possible to bring forward development in sustainable locations on the edge of North and West Bexhill. This option will be split into two sub-options related to growth that can be accessed and developed (a) without, and (b) with the need for a new multi-modal road between the A259 (Barnhorn Road) and A2691 (Haven Brook Avenue)..
- (iii) **Hastings Fringes Urban Growth** – There are opportunities for sensitive development on the edge of Hastings (on land within Rother District), adjoining the built-up boundary. This option is to be considered in principle only at this stage as the scale and amount of development will be determined and evidenced by the HELAA; and
- (iv) **Brownfield intensification and redevelopment** – There is limited future opportunity for development to take place on brownfield sites within existing built-up areas, and for sites to be redeveloped for more efficient use of land for housing and economic development. In this option, development would be focused within the existing areas of built form of sustainable settlements, primarily on brownfield development and at higher densities.

9.5. Consideration is given to the opportunities for development along transport corridors or located near to sustainable transport options, such as train stations and bus routes. The following two options proposed are:

- (i) **Growth in settlements with train stations or sustainable transport alternatives** –Focus growth in locations and settlements close

to train stations that act as a sustainable transport hub, and linkage to bus services;

- (ii) **A21 Corridor growth, with focus on a sustainable transport corridor** - Focus development along the A21 within an identified corridor of settlements, with opportunities for sustainable growth. This option could provide opportunities for sustainable travel through enhanced bus services and cycling provision along the transport corridor.

9.6. The final options are related to development outside of the defined High Weald Area of Outstanding Natural Beauty and the creation of new settlements, as presented below:

- (i) **Development focused outside the AONB** - Concentrate new development only in locations outside the High Weald AONB., This would result in a southern, coastal focused development strategy centred around Bexhill and Rye. This area is also impacted by other environmental designations and constraints and development would be steered away from these areas;
- (ii) **New rural settlement(s)** – There may be opportunities for an individual or a number of new settlements with their own facilities and services and necessary infrastructure to ensure sustainability. This development will be assessed in principle as there is limited reasonable prospect of a significant level of growth coming forward outside any existing built up area or settlement. This is discussed in more detailed in the following sections of the Background paper.

9.7. It is considered that the development options described above present the full range of options that should be considered for the Local Plan development strategy. Whilst the options should be considered for their own merits in isolation, it is appropriate to also consider synergies between options and the opportunities for them to be combined to form the most appropriate and sustainable strategy for the district. Additionally, the Council may have its own preferences with regards to the combination of options that would meet wider corporate aims and ambitions, along with others better matching the vision and spatial objectives of the Local Plan. However, it is appropriate to assess each option independently as part of the sustainability appraisal process using the SA framework that has been devised and

agreed as part of the SA/SEA⁴¹ Scoping Report for the Local Plan. This will draw out the most sustainable options, and if relevant the most sustainable combination of options to move forward in the Local Plan.

⁴¹ Sustainability Appraisal/Strategic Environmental Assessment

Figure 8. Spatial Development Options for the Rother Local Plan

Spatial Development Option (SDO)	Description/Vision	Focus Areas for Growth in Settlements/Areas of Built Form
SDO1: Village Clusters	A cluster of villages that are connected with each other to form a sustainable community. Two clusters identified centred around Rye and Battle as key transport and service hubs.	<ol style="list-style-type: none"> 1) Rye Cluster – Rye, Camber, Northiam, Playden, Iden, Rye Harbour, Winchelsea, Winchelsea Beach, Peasmarsh, Broad Oak, Beckley, Northiam, Broad Oak/Brede, Udimore 2) Battle Cluster – Battle, Crowhurst, Sedlescombe, Catsfield, Catsfield Stream, Whatlington, Mountfield, John’s Cross, Netherfield.
SDO2: Radial settlement network connected to Bexhill and Hastings	A radial network of smaller settlements connected to the facilities and services t of Bexhill and Hastings to create sustainable communities.	<p>Bexhill network: Crowhurst, Catsfield, Lunsford Cross, Normans Bay, Hastings network: Hastings fringes (Rock Lane and Austen Way, Chowns Hill and Ivyhouse Lane, Westfield Lane, Bachelors Bump, Friars Hill, Woodlands Way and Parkwood Road), Sedlescombe, Westfield, Guestling Green, Icklesham, Three Oaks, Pett and Fairlight</p>
SDO3A: Bexhill Greenfield Growth Option 1 –within the existing road network	Development on the edges of North and West Bexhill that creates new compact, connected communities, or additions to Sidley or Little Common, accessed by the existing transport network.	North and West Bexhill. The quantum of development that would be acceptable would be tested through landscape, sustainability and transport assessment. A Bexhill-wide place-making strategy would be required to successfully integrate new development.
SDO3B: Bexhill Greenfield Growth Option 2 –with new multi modal transport corridor	A higher level of growth in North and West Bexhill through new sustainable communities that are masterplanned, accessed and served by a new multi-modal transport corridor between the A259 and the A2691 (Haven Brook Avenue). Opportunity to remove through traffic and potentially reallocate road space in Bexhill for shared and active transport.	North and West Bexhill, with the development of new sustainable communities which links to and provides greater accessibility to community facilities and services in the wider Bexhill area. Mixed use development with a potential range of residential development from 1,500-5,000 dwellings
SDO4: Sustainable Settlement Growth	Prioritise new development on the edge of sustainable settlements, providing major development and extending settlement boundaries where appropriate	On the edge of settlements that score highest with regards to sustainability in the Settlement Study: Bexhill, Rye, Battle, Robertsbridge, Ticehurst, Northiam and then smaller growth for other settlements.
SDO5: Hastings Fringes Urban Growth	Development on the edge of Hastings in sustainable locations, which may provide opportunity for joint delivery of sites by Hastings BC and Rother DC	On sites around Hastings Fringes, , accessed from The Ridge, Queensway, Hastings Road, Stonestile Lane, Ivyhouse Lane,Rock Lane, and Rye Road

Spatial Development Option (SDO)	Description/Vision	Focus Areas for Growth in Settlements/Areas of Built Form
SDO6: Brownfield development	Development within the existing areas of built form, focusing on brownfield development at higher densities	Larger settlements, but principle applies to all settlements, but with different scales and opportunities
SDO7: New rural settlement(s)	Opportunity for (a) standalone settlement(s), with the provision of facilities and services to ensure sustainability	No specific locations have been identified, but in principle this would include around 1,000-2,000 dwellings in a new settlement
SDO8: Proportional growth across the District (by population)	Proportional distribution of development based on the current population of each settlement.	50% of development in and around Bexhill, with proportionate growth in Rye and Battle and the larger villages of Robertsbridge, Northiam, Ticehurst, Westfield and Burwash for example.
SDO9: Proportional growth by settlement form and function	Proportional distribution of development based on the order of the settlement in the network of settlements (service centre or hierarchy approach which does not take account of constraints)	Bexhill, Rye and Battle, and then lower order settlements as identified in the Settlement Study.
SDO10: A21 Corridor growth, with focus on creation of a sustainable transport corridor	Development along the A21 within an identified corridor of settlements, with opportunities for growth. Opportunities for sustainable travel through enhanced bus services and cycle track along this corridor.	The following settlement areas south to north: Hastings Fringes/The Ridge, Kent Street, Sedlescombe/Blackbrooks/Marley Lane, Whatlington, Vinehall Street, Johns Cross/Mountfield, Robertsbridge/Salehurst, Silverhill, Hurst Green, Swiftsden, and Flimwell.
SDO11: Growth in settlements with train stations	Development around train stations in settlements served by them ⁴² .	Bexhill (Cooden Beach, Collington and Central), Normans Bay Crowhurst, Battle, Robertsbridge, Etchingham, Stonegate, Three Oaks, Rye
SDO12: Outside the AONB	Development only outside the High Weald AONB, which would result in a coastal development strategy including Bexhill and Rye	Bexhill and its edges, Normans Bay, Catsfield (southern section), some areas of Hastings Fringes/Westfield Lane, Rye, Rye Harbour, Playden, Winchelsea Beach and East Guldeford

⁴² This does not include places where the station is not in the settlement - i.e. Winchelsea, Stonegate and Doleham

10. Sustainability Appraisal

Purpose of the Sustainability Appraisal

- 10.1. The purpose of the sustainability appraisal process is to test any emerging policy options or strategies against the sustainability criteria that has been set and agreed in the SA framework of the SA/SEA Scoping Report. This framework pulls together 20 sustainability appraisal objectives that have been devised to cover the key areas of sustainability that are required to be assessed under planning legislation, and these generally match the Council’s key issues and evidence base. This forms a standard framework that policy options can be assessed in a consistent way and the outcomes will determine what the most sustainable options are for the Council.
- 10.2. A detailed analysis and summary of the sustainability appraisal of the development options can be found in Appendix 1 and 2 of this report. This provides an assessment of how each option performs (e.g. negative, neutral, positive) impacts against each of the 20 sustainability appraisal objectives, using the following annotations and scoring:

++	Strong positive impact (+2 points)	+	Positive impact (+1 points)	0	Neutral impact (0 points) – balanced impact or no/questionable impact	-	Negative impact (-1 points)	--	Strong negative impact (-2 points)
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Outcome of the Sustainability Appraisal

- 10.3. By undertaking the sustainability appraisal of each option in isolation, it is possible to see the individual merits of each option and allows a direct comparison of options. The appraisal has shown that the most sustainable options are those which have the least environmental impacts, and which focus on improving sustainable transport alternatives. There will inevitably be negative impacts for every option on specific sustainability objectives, as growth through the development strategy will not directly improve air quality, nor will it reduce waste for instance. A justification for the assessment of each objective is given in the commentary column.

10.4. The development options that have scored the highest are summarised as follows:

- **Bexhill Greenfield Growth Option 2 (SDO3B): with new Multi-Modal Transport Corridor:** would maximise growth on the edge of the District's largest and most sustainable settlement. The creation of a multi-modal transport corridor linking the A259 (Barnhorn Road) and A2691 (Haven Brook Avenue) could be a long term strategy (30 year vision) for the Council (as it would stretch beyond the timeframe of the Local Plan). The West Bexhill feasibility study has concluded that the a new transport corridor is not deliverable e within the timeframes of the Local Plan to 2040. There could be wider cumulative positive impacts, if planned for successfully, e.g. creating new compact and connected new communities close to Bexhill and outside the AONB, free up road space on radial roads within Bexhill to prioritise buses and provide segregated cycling and wheeling routes; and remove traffic from existing lanes. However this is balanced against the negatives of this option such as the significant investment I a road rather than investment in public services. For the reasons identified previously, this option is not deliverable.
- **Brownfield Intensification and Redevelopment (SDO6):** a sustainable option with limited environmental and AONB impacts as it focuses development within the built up areas, and at higher densities. This option relies on sufficient sites coming forward through the HELAA process for redevelopment at higher densities. While this can be bolstered by windfall development the densification of existing areas will be a long-term piecemeal process;
- **Growth in settlements with train stations (SDO11):** a sustainable travel option, with direct connections via the rail network. Research indicates that people are willing to walk 1km or cycle 5km to access a station⁴³;
- **Bexhill Green Growth Option 1 (SDO3A): within existing road network:** Long term impact, with long term vision for the wider Bexhill area. Linkages to provide greater connectivity and accessibility to Bexhill's community facilities and services;

⁴³ [RP UK September 2022 RSK v2-002.pdf \(scptransport.co.uk\)](#)

- **Village Clusters (SDO1):** Sustainable longer term strategy for villages in rural locations, but with close proximity to nearby towns, where sustainable transport options and services and facilities are available.
- **Hastings Fringes Urban Growth (SDO5):** Land availability around Hastings Fringes is finite based on environmental and topographic constraints. It is unsuitable for continuous extension into the countryside however, there are opportunities for growth, which could deliver connected communities with supporting infrastructure.
- **A21 Corridor Growth with Sustainable Transport Corridor (SDO10):** Sustainable strategy in locating development along the strategic road network which can be improved to provide improved sustainable travel options such as bus routes, cycling and walking infrastructure;
- **Sustainable Settlement Growth (SDO4):** Long term impacts, land availability around settlements in some instances is finite based on environmental and topographic constraints. It would be unsuitable for continuous extension into the countryside without a more holistic long term strategy including the delivery of supporting infrastructure, services and facilities;
- **Radial Settlement Network Connected to the Main Urban areas of Bexhill and Hastings (SDO2):** A sustainable strategy that allows for sensitive amounts of developments in settlements that are well connected to the existing larger urban areas and where distance travel distance to services and facilities and sustainable transport options is relatively short. Long term changes required to provide more effective sustainable transport connections to the network.

10.5 The Sustainability appraisal summarises that the following options cannot be carried forward to the development strategy, for the identified reasons below:

- **SDO7: New Rural Settlements** – Some negative impacts, but overall slightly positive. Long term impacts in permanently changing the character of the rural area. This option is difficult to deliver without major landowner support and land availability. There have been no significantly sized major sites (submitted for consideration and assessment as part of the HELAA process) or wider areas identified in sustainable locations in order to support this option, and as such it is not feasible and sustainable to carry forward this

option. There may be opportunities to consider this option as part of a wider 30 year vision in line with longer-term improvements to the A21 corridor (The Transport for the South East Strategic Investment Plan), but this is beyond the plan period for this Local Plan,

- **SDO3B: Bexhill Greenfield Growth Option 2 with New Multi-modal Transport Corridor** – for reasons identified in paragraph 10.4 above, the new multi modal corridor is not deliverable within the timescales of the Local Plan to 2040 and as such is not a deliverable option for the development strategy.
- **SDO9: Proportional Growth by Settlement Form and Function** - As this replicates expansion of the current settlement pattern, this assumes settlements can continue to grow, which may not be possible due to physical constraints
- **SDO8: Proportional Growth Across the District** - As this replicates expansion of the current settlement pattern, this assumes settlements can continue to grow, which may not be possible due to physical constraints
- **SDO12: Development focused outside the AONB** - Short and long term impacts would include a southern, coastal focused development strategy which could result in greater disparities between rural and urban areas and a potential north-south divide in the provision of services and facilities

11. Preferred Option(s)

Preferred Option(s) for the Development Strategy

- 11.1. The sustainability appraisal (Figures 12 and 13 of the SA Interim Report) provides the detailed assessment of the sustainability benefits of each of the spatial development options.
- 11.2. The combination of options to be taken forward as the Council's proposed development strategy, are:
- Brownfield intensification and redevelopment within sustainable settlements (Option reference SDO6).
 - Bexhill greenfield growth on the northern and western edges of the built-up area of Bexhill to create new compact, connected communities (SDO3A)
 - Hastings Fringes urban growth (SDO5)
 - Radial settlement network connected to Bexhill and Hastings (SDO2)
 - Village clusters centred around Rye and Battle (SDO1)
 - Sustainable settlement growth (SDO4) with longer term, a focus on the A21 Corridor (SDO10).

Justification

- 11.3. The sustainability appraisal of the proposed development strategy demonstrates that the combination of options together is sustainable. The development strategy cannot in isolation result in significant environmental improvement across the District, but supportive policies will ensure the Local Plan meets its 'green to the core' and 'live well locally' overall Priorities. This is in line with the Council's Local Plan vision and objectives. The Bexhill green growth options cannot come forward together, as one of the options is dependent on the longer term delivery of a multi-modal sustainable transport corridor and one is not. It is confirmed through the West Bexhill feasibility study that the new multi-modal corridor is not deliverable within the timescales of the Local Plan to 2040. Therefore, growth that can be accommodated within the existing transport network can only be brought forward, supported with further transport assessment work

- 11.4. The proposed strategy has included radial settlement networks from the main urban areas of Bexhill and Hastings, because although it scores the same as other discounted options, it is considered that this option could be delivered effectively alongside other options (sustainable settlement extensions, A21 corridor long term vision and town/village network clusters for example).
- 11.5. The proposed strategy will only be able to be delivered where physical development constraints allow and as such the sites that come forward under the proposed strategy will be directed by the development potential identified in the Council's Housing and Economic Land Availability Assessment (HELAA). The quantum of development which is appropriate for each settlement or area of built form will be directed by the sustainability assessment of each area as part of the Settlement Study, which assesses the form and function of each settlement and how sustainable a location it is to accept future growth, and any infrastructure that may need to be delivered to facilitate new growth. All sites that are identified as developable in the HELAA will be put through the sustainability appraisal to assess the strength in sustainability of each site against the SA framework.

Proposed Development Numbers for Residential and Employment Growth

- 11.6 The 2014 Core Strategy planned for a growth level of at least 5,700 dwellings between 2011 and 2028 which works out at 335 homes per year. The actual number of houses built each year since has averaged 219 (net additional dwellings per year). By contrast, Rother's minimum local housing need (LHN) figure, defined using the national standard method calculation is 733 dwellings per year (2023 Base date). It is the role of the Local Plan to identify the number that can appropriately be accommodated, and it is this "appropriate" growth that this development strategy plans for. The aim is to meet the needs of the district, including the need for affordable housing.
- 11.7 The Council has planned positively by undertaking a comprehensive assessment of development potential through its Housing and Employment Land Availability Assessment (HELAA) and the Settlement Study, to establish whether housing growth could be significantly increased. Over 200 sites have been put forward

through a Call for Sites. To 'leave no stone unturned', the Council has identified and assessed nearly 800 additional sites, which include sites currently allocated or with planning permission.

- 11.8 Development will only be acceptable where it does not have an adverse impact on the natural environment. There are many constraints across the district which impact on the overall suitability of land. Development will need to be steered away from areas of high flood risk, designated habitats sites and other areas with important high landscape value. With regards to flooding, in line with the NPPF, the development strategy will take a sequential development approach to ensure that suitable land is identified in lower risk areas before development in areas at higher risk of flooding from all sources is considered, with any appropriate mitigation. This will be informed by the Council's Strategic Flood Risk Assessment (SFRA) which is currently being developed. The Council will use this approach to inform decisions on the potential sites for development and any subsequent site allocations, at the next stage of the Local Plan.
- 11.9 The proposed spatial development strategy seeks to maximise development opportunities while also delivering the Local Plan's vision and objectives. Growth will be directed to settlements and locations in line with the proposed strategy above, and this will be informed by the overall sustainability of the settlement (as assessed in the Settlement Study), physical and environmental constraints, and the number of sites within or around settlements that have been assessed as 'identified' or 'potential additional' sites in the Council's draft HELAA.
- 11.10 Sites that have been categorised at this stage as 'potentially developable' are those where the Council requires confirmation that from the landowner that a site is available, or where there are outstanding issues relating to site suitability and achievability. As such, a development range is presented to reflect the potential variance in the quantum of development that has been assessed as being able to be accommodated.
- 11.11 The employment need figure of 74,189sqm applies to the whole district. The Rother and Hastings joint Housing and Economic Development Needs Assessment ([HEDNA](#)) (2024) does not identify a separate figure for the rural areas. While the delivery of floorspace in rural areas over the past decade indicates that they will

have a continued role in meeting overall future needs, including providing some flexibility to meet changing market demand particularly in the small-scale office market, there is no clear evidence that a specific employment floorspace requirement needs to be identified.

- 11.12 Despite a relatively high increase of floorspace in rural areas during this time, the continuation of these trends, without a substantial delivery of the existing pipeline in urban areas, would meet only a very small proportion of the overall need figure. Moreover, patterns of demand and supply should be considered primarily as part of the FEMA total. Instead of establishing a need figure for the rural areas, the approach of the Local Plan is to support diversification and allow rural businesses to respond to external factors, including changing markets and climate change.
- 11.13 The need figure (from the HEDNA, 2024) in this overall spatial development strategy is lower than the existing pipeline of employment floorspace throughout the district, that consists of existing Local Plan allocations, sites with planning permission, as well as sites with expired permission that have been identified as developable in principle. The employment need figures and the current supply of employment floorspace are set out in **Error! Reference source not found.** below.

Figure 9: Demand vs supply balance, employment floorspace (sqm)

Employment Typology	Need (HEDNA, 2024)	Current Supply	Balance
Office	22,776	47,970	25,194
Light Industrial & Industrial	18,991	47,970	28,979
Storage & Distribution	32,422	10,660	-21,762
Total	74,189	106,600	32,411

- 11.14 With the exception of storage and distribution, Rother’s current pipeline of employment floorspace exceeds its future requirement in this plan period. Consequently, the delivery of existing allocations and other commitments remains a priority. The deficit in the balance of storage and distribution floorspace is a concern, though it is considered that the surplus of commitments of industrial

floorspace provides a justification for a flexible approach for taking forward existing site allocations.

- 11.15 At the same time, the delivery of existing commitments is by no means certain, and therefore the surplus identified above is not considered to constitute an oversupply of floorspace. The HEDNA (2024) identifies that continued public sector interventions will be required to ensure that existing allocations are delivered, including those in Bexhill which form a large proportion of the committed supply pipeline. Moreover, the HEDNA emphasises the uncertainty in forecasting future need, given the macroeconomic and technological factors identified above. This requires an economic strategy that is flexible enough to respond to a changing economic climate.
- 11.16 The Local Plan will meet this target, both through direct intervention in the form of flexible site allocations, as well as a policy approach that supports sustainable economic development that comes through the market. Local Plan policies must also reflect the substantially different geographies within the district; economic issues and challenges in rural areas are often different from those in urban areas, necessitating a unique set of policies relating to rural development.
- 11.17 The overall residential and employment growth (numbers) that can be accommodated in the draft Local Plan and summarised in Figure 10 below and are further detailed in the next section of this background paper.

Figure 10: District-wide development potential in the Local Plan

	Total dwellings	Total employment floorspace (sq. m.)
Constructed 1 April 2020 – 31 March 2023	802	5,927
Known completions and commencements on large sites since 1 April 2023 ⁴⁴	340	0
With Planning Permission ⁴⁵	1,693	39,440

⁴⁴ where the sites are no longer considered through the HELAA.

⁴⁵ As at time of publication. Excludes sites completed after 31 March 2023.

DaSA and Neighbourhood Plan allocations without permission brought forward	1,660	32,790
Additional HELAA potential sites ⁴⁶	2,129	26,234
Windfall projection (across the district)	663	0
Total Range	5,158-7,287	78,165-104,399

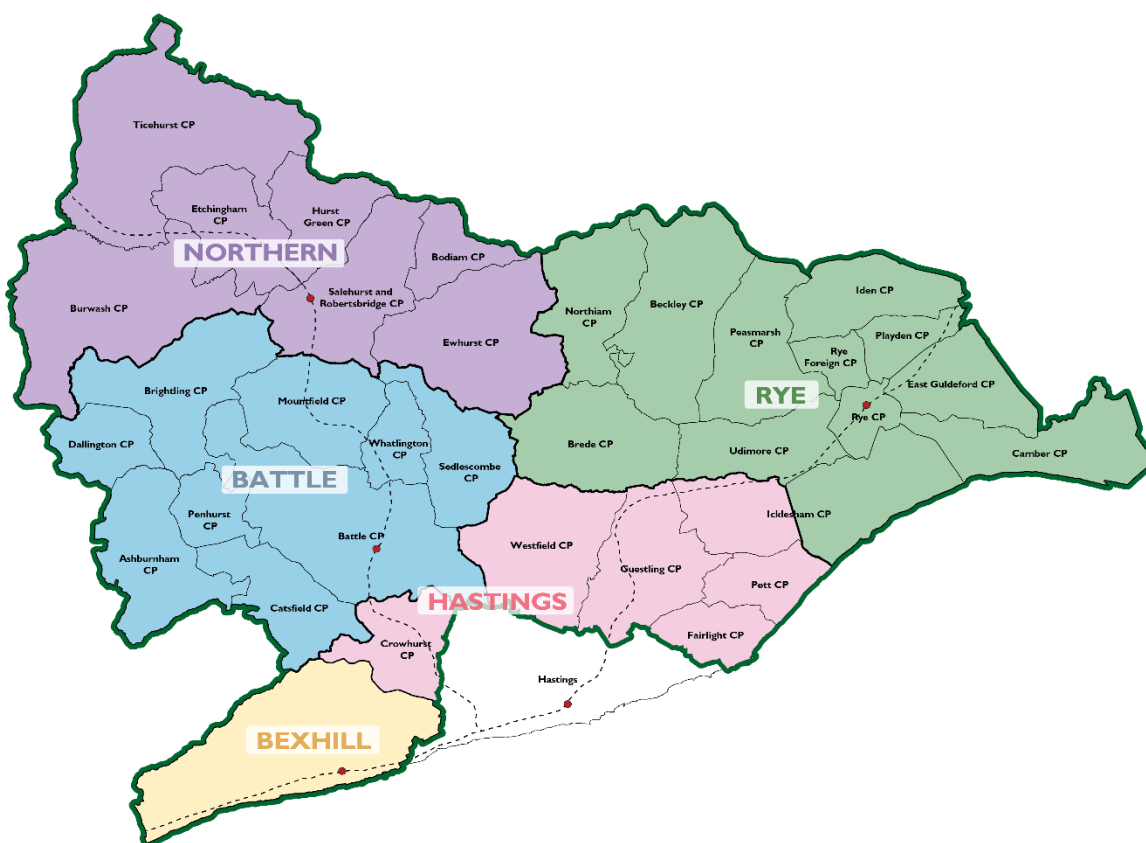
Delivering the Spatial Development Strategy and Sub-Area approach

11.18 Rother’s proposed development strategy has been split into five spatial sub-areas, **Error! Reference source not found.11**, which align with the principles and focus areas of growth presented above. Each of these spatial sub-areas has their own vision statement and identified distribution of development, which follows in the remainder of this chapter. The five sub-areas comprise:

- Bexhill;
- Hastings Fringes and settlements that radially link to Hastings;
- Battle and its cluster of connected settlements;
- Rye and its cluster of connected settlements; and
- Northern Rother – the settlements in the north-east of the district.

⁴⁶ Includes sites which are understood to be available for development, but not suitable sites that are not known to be available.

Figure 11: Rother District split into the Five Sub-Areas of the Development Strategy



- 11.19 While the development strategy has been split into five areas, it is recognised that residents will utilise services and facilities in multiple major towns, villages and rural areas within and outside the district, to enable them to live well locally. While there is overlap, for clarity, settlements (and their identified growth potential) have been presented in only one of the five sub-areas.
- 11.20 In all five sub-areas there is open countryside, which has its own vision in this chapter. It relates to those areas outside of villages with development boundaries and includes farmland, woodland, hamlets and scattered development.
- 11.21 The proposed amount of growth above has been included in the development strategy wording for the Local Plan as identified below:

Strategy Wording:

The Council will meet the local need for all forms of housing, jobs, facilities and services by strengthening Rother's pattern of development through a landscape-led spatial development strategy that focuses on the 'Live Well Locally' concept. To achieve this, a minimum of [5,158 to 7,287]* dwellings, at an average rate of [258 to 364]* per year and a minimum of 74,189sqm* additional employment floorspace will be constructed by the end of the Plan period in 2040.

Bexhill will continue to be a town that acts as a main transport and community hub. A network of settlements surrounding both Bexhill and Hastings (outside the local authority) will be able to access the two towns' wider services and facilities by sustainable modes of transport.

Rye and Battle will be the centre of clusters of settlements that collectively provide what most residents need for their daily lives. Rye and Battle will continue to be key transport and community hubs, with improved active and public transport, better connecting the cluster of settlements to the towns. There are opportunities for sensitive growth in these clusters alongside new facilities and services for both new and existing residents to benefit from.

Based on these principles, the focus for growth will be in the following broad locations:

- West and North Bexhill to consolidate Bexhill as the most sustainable town, within the capacities of the existing transport network;
- clusters of villages based around the towns of Battle and Rye which act as key transport hubs;
- settlements on radial routes connected to the main urban areas of Bexhill and Hastings, allowing sensitive development in locations that rely on the larger towns for services and facilities;
- development at Hastings Fringes, providing sensitive growth;
- urban intensification and redevelopment across the district in appropriate and sustainable brownfield site locations;
- sensitive development in other rural settlements of the district; and
- in the longer-term, sensitive growth along the A21 Corridor.

**The final housing and employment target will be minimum figures. For the Regulation 18 consultation, the overall housing and employment figures are presented as a range, with the lower figure representing the totals of the “identified sites” (current allocations and sites with planning permission), and the upper figure representing the identified sites plus the total capacity of “potential additional sites” (sites identified in the draft HELAA as being potentially suitable, available and achievable for development during the Local Plan period). Therefore, the range is subject to change (either by an increase or reduction). The stated employment target in this box is the employment need figure in the HEDNA, 2024. The employment figures presented as a range for each sub-area represent the employment supply – which is higher than the need figure.*

- 11.22 The development strategy chapter of the Local Plan will further present visions and growth opportunities within each of the 5 sub-areas identified in paragraph 11.18.

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