



Rother District Local Plan 2025 - 2042

**Interim**

# **Duty to Cooperate Statement**

Draft (Regulation 18) Version – January 2026

[www.rother.gov.uk](http://www.rother.gov.uk)

This information can be made available in large print, audio or in another language upon request.

Please telephone **01424 787668** or email  
[planning.strategy@rother.gov.uk](mailto:planning.strategy@rother.gov.uk)

# Contents

|   |           |
|---|-----------|
| <b>Abbreviations .....</b>  | <b>2</b>  |
| <b>1. Introduction .....</b>  | <b>3</b>  |
| Purpose of this document.....   | 3         |
| Legislative and policy context .....  | 3         |
| Rother context.....   | 6         |
| <b>2. Strategic cross boundary matters .....</b>                                  | <b>9</b>  |
| Meeting housing needs.....  | 9         |
| Meeting accommodation needs of gypsies, travellers and travelling showpeople..... | 10        |
| Meeting economic development needs .....  | 11        |
| Furthering the purpose of the High Weald National Landscape .....                 | 12        |
| Conserving and enhancing the historic environment .....                           | 13        |
| Protecting and enhancing biodiversity and open spaces .....                       | 14        |
| Coastal change and marine management.....   | 15        |
| Sustainable transport and movement.....   | 16        |
| Sustainably managing waste and minerals.....                                      | 17        |
| Climate resilience (including flood risk and water management) .....              | 18        |
| Securing the timely delivery of infrastructure to support growth .....            | 18        |
| <b>3. Demonstrating constructive, active and ongoing cooperation .....</b>        | <b>21</b> |
| Ongoing cooperation .....   | 21        |
| Statements of Common Ground .....   | 21        |
| Consultation on the Draft Rother Local Plan (2024) .....                          | 22        |
| External planning consultations .....   | 23        |
| Planning Working Groups.....  | 24        |
| Shared evidence base .....  | 26        |
| Requests made by the Council regarding unmet housing need .....                   | 27        |
| Record of key matters and cooperation with prescribed bodies .....                | 28        |

## Abbreviations

|       |   |
|-------|---|
| AONB  | Area of Outstanding Natural Beauty (National Landscape) |
| BNG   | Biodiversity Net Gain                                   |
| CIL   | Community Infrastructure Levy                           |
| ESCC  | East Sussex County Council                              |
| DtC   | Duty to Cooperate                                       |
| IDP   | Infrastructure Delivery Plan                            |
| GTAA  | Gypsy and Traveller Accommodation Assessment            |
| HEDNA | Housing and Economic Development Needs Assessment       |
| HELAA | Housing and Economic Land Availability Assessment       |
| HRA   | Habitats Regulations Assessment                         |
| HWNL  | High Weald National Landscape                           |
| LDS   | Local Development Scheme                                |
| LPA   | Local Planning Authority                                |
| NPPF  | National Planning Policy Framework                      |
| PPTS  | Planning Policy for Travellers Sites                    |
| SA    | Sustainability Appraisal                                |
| SARMS | Sustainable Access and Recreation Management Strategy   |
| SCI   | Statement of Community Involvement                      |
| SEA   | Strategic Environmental Assessment                      |
| SFRA  | Strategic Flood Risk Assessment                         |

# 1. Introduction

## Purpose of this document

- 1.1. This Interim Duty to Cooperate Statement has been prepared to support the new Rother Local Plan.
- 1.2. Rother District Council (“the Council”) is producing a new Local Plan for the period covering 2025-2042. Once adopted, the new Local Plan will form part of the Development Plan for the district. It will update and replace Rother’s Core Strategy (2014) and Development and Site Allocations (2019) Plans. The new Local Plan will contain a vision, strategic objectives and planning policies to steer development decisions across Rother.
- 1.3. The Council has a statutory ‘Duty to Cooperate’ constructively, actively and on an ongoing basis with neighbouring authorities, county councils and other prescribed bodies in planning for strategic cross boundary matters. A local plan can only be adopted and brought into force if the Duty to Cooperate has been met during its preparation, and this is tested at the plan’s independent examination.
- 1.4. This Interim Duty to Cooperate Statement should be read alongside the Engagement and Duty to Cooperate Statement (2024) and New Local Plan Early Engagement Document (2021). These documents are available to view on the Council’s Local Plan evidence base webpage.

## Legislative and policy context

- 1.5. The Duty to Cooperate was introduced by Section 33A of the Planning and Compulsory Purchase Act 2004, as amended by the Localism Act 2011. This requires the Council to engage constructively, actively and on an ongoing basis with other local authorities, county councils and other prescribed bodies, in order to maximise the effectiveness of the activity so far as it relates to a strategic matter.
- 1.6. A strategic matter is defined by subsection (4) of the Act as sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of

land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas.

- 1.7. The bodies listed in subsection (1) of the Act with whom the Council has a duty to cooperate are: other local planning authorities; county councils that are not a local planning authority; and bodies that are prescribed or of a prescribed description.
- 1.8. The bodies prescribed for the purposes of section 33A(1)(c) of the Act are set out in Regulation 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012, as follows:
  - Environment Agency
  - Historic Buildings and Monuments Commission for England (now Historic England)
  - Natural England
  - Mayor of London
  - Civil Aviation Authority
  - Homes and Communities Agency (now Homes England and Regulator of Social Housing)
  - Integrated Care Boards
  - NHS England
  - Office of Rail and Road
  - Transport for London
  - Integrated Transport Authorities
  - Highway Authorities
  - Marine Management Organisation
- 1.9. The bodies prescribed for the purposes of section 33A(9) of the Act are Local Enterprise Partnerships and Local Nature Partnerships.
- 1.10. The relevant authorities for Rother, considering its geographic context, are set out below:
  - East Sussex County Council
  - Kent County Council
  - Brighton & Hove City Council
  - Ashford Borough Council

- Eastbourne Borough Council
- Folkestone & Hythe District Council
- Hastings Borough Council
- Lewes District Council
- South Downs National Park Authority
- Tunbridge Wells Borough Council
- Wealden District Council

1.11. The Duty to Cooperate bodies specified in the Regulations but not considered by the Council to apply in the context of the Rother District Council are:

- Mayor of London
- Transport for London

1.12. The National Planning Policy Framework (NPPF) (2024), at paragraphs 24-28, sets out the importance of maintaining effective cooperation during the plan-making process. It highlights some of the key considerations and issues that should be addressed particularly in term of cross boundary strategic matters. These issues include meeting housing needs, delivering strategic infrastructure and building economic and climate resilience.

1.13. The NPPF also suggests that cooperation should extend beyond the prescribed Duty to Cooperate bodies, so that Local Planning Authorities also engage with local communities and relevant bodies including Local Nature Partnerships, the Marine Management Organisation, and infrastructure providers where relevant.

1.14. Importantly, The Minister of State for Housing and Planning, on 25 November 2025, [wrote to the Planning Inspectorate](#) to set out that Government intends to revoke the Duty to Cooperate for the current plan-making system. This will be formalised by further legislation, which at the time of writing this report, is pending and yet to come into force. However, the Minister has also made clear that Local Planning Authorities should continue to collaborate across their boundaries, including on unmet development needs from neighbouring areas. This is reflected in the Government's [consultation draft NPPF](#), published in December 2025.

## **Town and Parish councils**

- 1.15. Whilst Town and Parish Councils are not a prescribed body for the purposes of the Duty to Cooperate, the Council recognises the important role that they play in planning locally, particularly through Neighbourhood Planning. The Council continues to support parish councils in the preparation and review of their Neighbourhood Plans, in line with the statutory requirements. Furthermore, the Council has and will continue to engage with parish councils during the preparation of the new Rother Local Plan. As an alternative to Neighbourhood Plans, the Council is aware that some parish councils are considering preparing a Parish Priority Statement. The Council will support parish councils in this process.
- 1.16. It is noted that the Government's Planning Practice Guidance<sup>1</sup> states that Neighbourhood Planning bodies are not bound by the Duty to Cooperate, nor are they required to produce or be involved in a statement of common ground as part of this process.

## **Rother context**

- 1.17. Rother is a one of 5 lower tier local authorities in East Sussex, also including Eastbourne Borough Council, Hastings Borough Council, Lewes District Council, and Wealden District Council. East Sussex County Council is the upper tier authority. The resident population of Rother is approximately 91,000, according to Census 2021 data, with roughly half of the population residing in Bexhill.
- 1.18. Rother is located on the south-east coast of England. It covers roughly 200 square miles by area, with a coastline spanning some 25 miles. The district is predominantly rural in nature and includes the High Weald National Landscape. The geographic context of Rother, and its neighbouring authority areas, is set out in Figure 1 below.

---

<sup>1</sup> National Planning Practice Guidance, Paragraph: 009 Reference ID: 61-009-20190315, Revision date: 15 03 2019

**Figure 1 - Rother Local Plan geographic context**



- 1.19. Rother contains the coastal town of Bexhill-on-Sea, and the historic towns of Battle and Rye. There are also many parishes, villages and other settlements located throughout the district. The A21 trunk road runs through the centre of the district north and south, and the A259 runs east and west near the coast.
- 1.20. 83 per cent of the district is located within the High Weald National Landscape, a designated 'Area of Outstanding Natural Beauty'. The High Weald is one of the best remaining examples of a medieval landscape in Northern Europe consisting of woods, small fields, farmsteads and ancient routeways.
- 1.21. Rother benefits from the presence of built and natural heritage assets. The historic environment is a highly valued and distinctive feature of the area, with statutory protection of over 2,000 listed buildings, 10 Conservation Areas, a number of Scheduled Ancient Monuments, as well as the 'Historic Battlefield' at Battle.
- 1.22. Approximately 7 per cent of the district includes internationally or nationally protected habitats sites. The Pevensey Levels, straddling the south-western boundary of the district, is a 'Ramsar' site, designated for its international importance as a wetland habitat and a Special Area of Conservation (SAC). On the south-eastern boundary, the Dungeness Complex of Habitats Sites comprises three overlapping international designations – the Dungeness, Romney Marsh and Rye Bay Special Protection Area (SPA) and Ramsar Site and the

Dungeness Special Area of Conservation (SAC). There are also many Sites of Special Scientific Interest (SSSIs) in Rother.

- 1.23. The partly low-lying and coastal nature of the district, along with its intricate network of ridges and valleys, make it particularly vulnerable to flooding. The predominant flood risk comes from the sea, rivers and watercourses, although the district also experiences surface water flooding. The majority of the coast benefits from flood defences.
- 1.24. Rother district effectively wraps around Hastings Borough. Because of their proximity and interconnectivity, Rother and Hastings share both a housing market area and a functional economic market area.

## 2. Strategic cross boundary matters

- 2.1. This section of the Interim Duty to Cooperate Statement sets out and discusses the key strategic cross boundary matters for the production of the Rother Local Plan. These matters have been identified through early-stage engagement and consultation with the prescribed Duty to Cooperate bodies, and other relevant bodies, as well as through the consideration of the Local Plan evidence base. The matters are not presented in order of priority or importance.
- 2.2. The matters set out are current as of January 2026, and the Council acknowledges that additional matters may arise as work on the plan progresses recognising that the Duty to Cooperate is an ongoing and iterative process.
- 2.3. The section includes some references to and examples of the Council's cooperation and engagement with the prescribed bodies. These have been included here to draw out and support the discussion on the key strategic cross boundary matters. Further details of the Council's cooperation and engagement with the prescribed and other bodies is set out in Section 3 of this Interim Duty to Cooperate Statement.

### **Meeting housing needs**

- 2.4. The NPPF stipulates that the national 'standard method' should be used to calculate the minimum amount of housing required in an area. At the time of the first Regulation 18 consultation on the draft Rother Local Plan in summer 2024, the standard method yielded a figure for the district of 733 net new homes per year. The NPPF was then updated in December 2024 along with changes to the standard method. It now yields a figure for the district of 912 net new homes per year. Over the 17-year plan period of 2025-2042, this amounts to a need of 15,504 net new homes.
- 2.5. From the early stages of the plan process, the Council has identified housing need and delivery as a key strategic cross boundary matter. It has indicated that there is unlikely to be sufficient suitable and available land to accommodate the full extent of needs set using the standard method. This is particularly given the significant step change from the Core Strategy housing target to the Government's latest housing need figure. Importantly, the heavily constrained nature of the district (including that roughly 90 per cent of the district is a

National Landscape or protected habitat site) means it is not suitable for unrestricted development.

- 2.6. In June 2024, in association with the publication of the Regulation 18 version of the Draft Rother Local Plan, the Council wrote to seven neighbouring and other close-by authorities to formally request that they consider accommodating potential unmet housing needs arising in Rother. These authorities confirmed that they were unable to, or not anticipating being able to, take on housing needs from Rother due to either not being able to meet their own needs in full, or not having any additional land capacity.
- 2.7. At this time, the Council does not anticipate being able to meet its identified housing need in full through the new Rother Local Plan. The reasons for this are set out in the Rother Draft Local Plan – Development Strategy and Site Allocations (2026) document. Therefore, the Council is not currently in a position to take on any unmet need from neighbouring or other authority areas. This situation is not unique to Rother. There are many other authorities in South-East England that are experiencing challenges in meeting identified housing needs in full.
- 2.8. It is noteworthy that Rother district and Hastings borough form a single Housing Market Area and Functional Economic Market Area (FEMA). Therefore, the Councils have cooperated to prepare a joint Housing and Economic Development Needs Assessment (HEDNA) to support the production of their respective emerging Local Plans. The Councils are continuing to cooperate to prepare updates to this study and will seek opportunities to work together to address needs across the area.

### **Meeting accommodation needs of gypsies, travellers and travelling showpeople**

- 2.9. The national Planning Policy for Traveller Sites (PPTS, updated 2024) sets out the Government's planning policy for the gypsy, traveller and travelling showpeople community. The PPTS confirms that Local Planning Authorities should make their own assessments of accommodation needs and, through Local Plans, 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 LPAs.

- 2.10. The Council is currently cooperating with all the other LPAs in East Sussex to identify and plan for the accommodation needs of gypsies, travellers and travelling showpeople. This is through a working group with an emerging Memorandum of Understanding, and also through shared work on the East Sussex Gypsy and Traveller Accommodation Assessment (GTAA). The first GTAA was published in 2022, and an update is underway, including the launch of a county-wide “Call for Sites” exercise in Summer 2025 to help identify available land. The Council is also engaging with other neighbouring local authorities, outside East Sussex, through the Duty to Cooperate and endeavouring to understand their position on provision for this group.
- 2.11. At this time, the Council anticipates being in a position to meet the relevant identified needs for Rother, as set out in the Rother Draft Local Plan – Development Strategy and Site Allocations (2026). This position is subject to review pending the findings of the GTAA update, and outcomes of work on the new Local Plan.

### **Meeting economic development needs**

- 2.12. The NPPF (2024) provides that Local Plans should help to build a strong and competitive economy, by helping to create the conditions in which businesses can invest, expand and adapt. It therefore encourages Local Plans to set out a clear economic vision and strategy which encourages sustainable economic growth, including by making provisions to meet identified economic development needs over the plan period.
- 2.13. The Council’s evidence base indicates that Rother district and Hastings borough comprise a self-contained Functional Economic Market Area (FEMA). This is due to the strength of links within the FEMA focused between Hastings, Bexhill and Battle (and to a lesser extent Rye) as the main urban concentrations of employment and economic activity. It is further reinforced by the profile of north-south and east-west links, focusing connections upon these settlements, and the relative absence of strategic transport links and influence of other urban centres upon the FEMA.

- 2.14. In light of this evidence, the Council has cooperated with Hastings Borough Council to prepare a joint Housing and Economic Development Needs Assessment. This sets out the overall need for land and floorspace for employment and economic development across the FEMA, whilst also setting requirements for the respective local authority areas. Through the preparation of the Local Plan, a key strategic issue is therefore seeking to ensure that Rother's identified needs are met, whilst also responding to needs across the FEMA.
- 2.15. One of the key and distinctive economic sectors in the FEMA is the visitor economy, which operates in both urban and rural areas. To help inform the production of their respective Local Plans, the Council and Hastings Borough Council have jointly commissioned a Tourism and Visitor Accommodation Study. This evidence will help to ensure a coordinated approach to promoting and supporting this sector within the FEMA as well as managing development proposals for associated uses.

### **Furthering the purpose of the High Weald National Landscape**

- 2.16. The majority of Rother district, some 83 per cent, is located within the High Weald National Landscape (HWNL), a designated 'Area of Outstanding Natural Beauty' (AONB). Section 245 (Protected Landscapes) of the Levelling-up and Regeneration Act, amends the duty on relevant authorities in respect of their functions which affect land in National Parks, National Landscapes, and the Norfolk and Suffolk Broads (collectively referred to as Protected Landscapes) in England.
- 2.17. Relevant authorities, which includes the Council in its function as a Local Planning Authority, must seek to 'further the statutory purpose' of National Landscapes. This replaces the previous duty on relevant authorities to 'have regard to' their statutory purpose. The duty is intended to facilitate better outcomes for England's Protected Landscapes. For National Landscapes the statutory purpose is conserving and enhancing the natural beauty of the area of outstanding natural beauty.
- 2.18. The NPPF (2024) confirms that major development in National Landscapes should only be permitted in exceptional circumstances and where it can be demonstrated that the development is in the public interest, having regard to the

need for the development, the cost of, and scope for developing outside the designated area, and any detrimental effects. The need for housing, including affordable housing, in sustainable locations within the district could potentially be an exceptional circumstance that could allow for a major development within the HWNL, subject to it meeting the other requirements of NPPF paragraphs and the legal duty.

- 2.19. The High Weald AONB Management Plan is the key strategic document for the AONB (i.e., National Landscape), prepared by the High Weald National Landscape Unit. It is a statutory document which defines the natural beauty of the AONB and sets out a twenty-year strategy supported by five-year action and investment priorities for conserving this nationally important landscape. Rother is one of 15 local authorities participating through the High Weald Joint Advisory Committee to support its implementation, in wider view of the legal duty.
- 2.20. The Council has been engaging with the HWNL Unit along with neighbouring authorities, which include areas of the landscape, through the preparation of the Local Plan (as well as on the HWNL Unit's guidance documents). The key strategic issue pertains to furthering the statutory purpose of the National Landscape, whilst addressing identified needs for new development in the authorities' respective Local Plans. This is particularly where the High Weald crosses or is located in proximity to Rother's administrative boundaries, including Ashford Borough Council, Tunbridge Wells Borough Council and Wealden District Council.

### **Conserving and enhancing the historic environment**

- 2.21. Rother has a rich historic environment and a valuable and extensive historic building stock, including as it does the historic market towns of Battle and Rye, the Victorian and Edwardian seaside town of Bexhill-on-Sea, the important planned medieval town of Winchelsea, and a host of picturesque villages and hamlets, listed buildings, including many isolated farmsteads dispersed throughout the High Weald, together with modernist buildings from the 1930s and 1960s.
- 2.22. The district's historic built environment has a high level of statutory protection; designated heritage assets include Listed Buildings, Conservation Areas,

Scheduled Ancient Monuments, Registered Parks and Gardens, and the 'Historic Battlefield' at Battle. Many other non-designated buildings and archaeological assets contribute positively to the physical, historic and socio-cultural character of the district.

- 2.23. The NPPF (2024) makes clear that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.
- 2.24. A key strategic matter for the new Local Plan is therefore to set a positive framework for the conservation and enhancement of the historic environment in the context of meeting identified development needs. From a cross-boundary perspective, it is vital that the significance of heritage assets, including their wider setting, is considered as part of the Development Strategy and site allocation policies which help give effect to this.

### **Protecting and enhancing biodiversity and open spaces**

- 2.25. There is a wide range of legislation and policy dealing with conservation of the natural environment. The Environment Act 2021 is noteworthy as it establishes a comprehensive legal framework for environmental protection in the UK, focusing on air quality, biodiversity, water resources, and waste management. Legal requirements for Strategic Environmental Assessment, Sustainability Appraisal and Habitats Regulations Assessment are also relevant, as they must be carried out during the production of the Local Plan. Further, the NPPF (2024) states that Local Plans should promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species, as well as pursue opportunities for Biodiversity Net Gain.
- 2.26. The protection and enhancement of Rother's environmental features and assets is an important strategic matter. These assets include internationally and nationally designated habitats sites and protected species, Local Wildlife Sites, the High Weald National Landscape (discussed previously), waterways and ancient woodland, to name a few. Together they form part of a connected network of blue green infrastructure that spans administrative boundaries.

Therefore, coordination between authorities and other stakeholders in managing land uses is vital to the integrity and function of this network.

- 2.27. A specific local and strategic matter for the district is the joint production and review of a Sustainable Access and Recreation Management Strategy (SARMS), which the Council has prepared with Folkestone and Hythe District Council (formerly Shepway District Council). The need for the SARMS has arisen through work on the authorities' respective Local Plans and supporting HRA. It pertains to the Dungeness complex of internationally important wildlife sites. The SARMS provides a strategic cross-boundary approach to issues relating to disturbance from recreational pressure.
- 2.28. Strategic cross boundary matters also include the protection and enhancement of open spaces, particularly in the context of the preparation of authorities' respective Local Plans and spatial strategies. Consideration needs to be given to the function and quality of open spaces, including the important role these spaces play in terms of their environmental functions (such as support for biodiversity and flood risk management), providing amenity for the local population, and preventing the coalescence of settlements. Rother's relationship with Hastings is notable, for example, in terms of the 'strategic gap' between Bexhill and Hastings, the Coombe Valley Countryside Park and Hastings Country Park.

### **Coastal change and marine management**

- 2.29. The NPPF (2024) broadly sets out the challenge of managing and adapting to coastal change. This is relevant to Rother district which, as set out above, is situated on the south-east coast and has a shoreline spanning some 25 miles. Furthermore, the Council, in its capacity as Local Planning Authority, must have regard to the Marine and Coastal Access Act 2009, the South Inshore and Offshore Marine Plan, and the UK Marine Policy Statement, insofar as making decisions that affect, or may affect, the marine area.
- 2.30. A key strategic matter for the Local Plan is to ensure that it sets a positive framework for coastal and marine management over the long-term, one which aligns with the above noted legislation and policy. This may be aided by the designation of a Coastal Change Management Area within the new Local Plan, in line with the NPPF, to help identify those areas most likely to be affected by

physical changes to the coast, and to help reduce risk within them. Consideration will also need to be given to integrating coastal management across local authority areas, particularly those adjoining Rother.

- 2.31. Coastal and marine management is a cross-cutting policy area, as it involves a wide range of planning considerations and therefore necessitates engagement and cooperation with multiple stakeholders, including the Marine Management Organisation (responsible for preparing Marine Plans), the Environment Agency and adjoining Local Authorities.

### **Sustainable transport and movement**

- 2.32. The NPPF (2024) provides that transport issues should be considered from the earliest stages of plan-making process, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. This approach requires the integration of transport and other uses in a coordinated way. The vision-led approach to transport is also advocated by the Government's Department for Transport Circular 01/2022 (Strategic road network and the delivery of sustainable development). At the local level, there are key plans and strategies that help give effect to this national policy, including the East Sussex Local Transport Plan 2024–2050 (also known as LTP4) and the East Sussex Local Cycling and Walking Infrastructure Plan (LCWIP).
- 2.33. A key strategic matter for the Local Plan is to ensure that growth and new development is appropriately supported by transport infrastructure (including high quality public realm) and further contributes to wider objectives around facilitating sustainable transport and modal shift away from car use, which is underpinned by priorities for decarbonising the transport network, reducing pollution and creating healthier, safer neighbourhoods.
- 2.34. Sustainable transport is a cross-boundary matter insofar as Rother's transport network, including movements within and throughout it, is part of a linked network encompassing neighbouring and other local authority areas in the south-east of England and beyond. Further, development and growth within Rother can have impacts both on the local and wider strategic transport network (particularly the highway network), which need to be considered during the plan process.

- 2.35. There are a wide range of stakeholders and delivery partners with oversight of, or that deal directly with, various elements of the transport system. This includes government bodies such as Transport for the South East, National Highways, The Office of Road and Rail, Active Travel England and East Sussex County Council (as the Local Highway Authority and integrated transport authority), as well as service providers such as Network Rail (and train operating companies) and bus operators.
- 2.36. The Council, in collaboration with key transport stakeholders including East Sussex County Council and National Highways, has a shared transport evidence base. This has been used to inform the production of the Local Plan, including an Interim Assessment (2022) on potential impacts of growth on the transport network. Further detailed modelling and assessment of the Local Plan proposals will be undertaken using the East Sussex Countywide Transport Model, as work on the plan progresses.

### **Sustainably managing waste and minerals**

- 2.37. The Waste Management Plan for England (2013) sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management, and it recognises that the planning system plays a pivotal role in this regard. The National Planning Policy for Waste (2014) provides national waste planning policies, which are to be read in conjunction with the NPPF and associated waste Planning Statements. These documents direct waste planning authorities to prepare plans which identify sufficient opportunities to meet the identified needs of their area for the management of waste streams, including sites or areas for facilities. The NPPF also provides policies to facilitate the sustainable use of minerals.
- 2.38. The East Sussex Waste and Minerals Local Plan sets the strategic framework for the management of waste and minerals in the district. This plan comprises a suite of planning policy documents which form part of the Rother's statutory Development Plan. It includes provisions for safeguarding land and sites for waste management and mineral extraction.
- 2.39. A key strategic matter for the Local Plan is to ensure that it works in conjunction with the East Sussex Waste and Minerals Local Plan and does not prejudice its

delivery. The matter has a cross-boundary nature, given the geographical scope of the Minerals and Waste Plan, which covers East Sussex, part of the South Downs and Brighton and Hove. The Council will take into account any comments of the County Council, as waste and minerals planning authority, on the effect of any proposed allocation sites on the waste and minerals consultation areas and safeguarding areas set out in the Waste and Minerals Local Plan.

### **Climate resilience (including flood risk and water management)**

- 2.40. The NPPF (2024) sets out the Government's approach to climate change adaptation and mitigation through the planning system. This is a 'cross-cutting' policy area in that it is covered by a wide range of thematic policy topics. They include but are not limited to flood risk and water management; waste management and minimisation; carbon reduction and energy security; development design, construction and operation; and sustainable transport. Many of these topics have been signposted and discussed elsewhere in Section 2 of this report.
- 2.41. Climate change is a global issue and therefore developing climate resilience is a strategic cross boundary matter. Coordination and cooperation is required at different levels of government and agency, whether internationally, nationally, sub-regionally or locally.
- 2.42. For Rother district, some of the key cross boundary matters for climate resilience are associated with flood risk and water management (including wastewater). This is particularly within the wider coastal area and river catchment for the sub-region. This includes the Cuckmere and Pevensey Levels Catchment, where there are important considerations for water quality and habitat management. There are a number of key stakeholders involved including Government bodies, Local Planning Authorities, Lead Local Flood Authorities, and infrastructure providers such as Southern Water and Southeast Water.

### **Securing the timely delivery of infrastructure to support growth**

- 2.43. The NPPF (2024) makes clear that Local Plans should be informed by effective joint working between strategic policy-making authorities and relevant bodies, particularly to establish where additional infrastructure is required, as well as to set out the infrastructure contributions expected from new development. The

NPPF also includes policies reflecting the need for different types of infrastructure to support sustainable development and economic growth. This includes transport, green infrastructure, social infrastructure and digital infrastructure to support sustainable development and economic growth.

- 2.44. The Council has prepared an Infrastructure Delivery Plan (IDP) which sets out the different types of infrastructure required to support growth and new development in Rother district, in accordance with the adopted Local Plan. Figure 2 sets out the range of categories and types of infrastructure that are relevant to Rother. Infrastructure delivery is not the sole responsibility of the Council, rather this depends on coordination amongst a wide range of infrastructure providers and other stakeholders that operate or have an interest in areas both within and beyond the district boundary – often with a sub-regional or national remit. It is therefore a key strategic cross boundary matter.
- 2.45. The Council's Engagement and Duty to Cooperate Statement (2024) discusses previous engagement the Council undertook with infrastructure providers and stakeholders at the early stage of the plan process. This included consultation on an 'IDP Questionnaire'. Feedback from this exercise, and new evidence, has helped to inform the preparation of the Draft IDP (2026), which the Council will circulate to stakeholders for feedback and inputting. The Draft Local Plan – Development Strategy and Site Allocations (2026) document, provides an updated position on the amount and location of new development expected to be delivered in Rother over the plan period. This will help infrastructure providers review and feedback on the latest Draft IDP.

**Figure 2 - Infrastructure types (as set out in Draft Infrastructure Delivery Plan)**

| <b>Category</b>                   | <b>Type</b>   |
|-----------------------------------|---|
| Transport                         | Cycling and Walking<br>Public transport<br>Strategic and local road network   |
| Community and cultural facilities | Sports and recreation facilities<br>Libraries<br>Arts, and cultural facilities<br>Youth and community facilities<br>Places of worship   |
| Education                         | Early years and childcare<br>Primary and secondary schools<br>Further and higher education  |
| Health and social care            | Primary care: GP surgeries, health centres<br>Secondary care: hospitals, diagnostic hubs<br>Community care: mental health, social care, care homes                                    |
| Green and blue infrastructure     | Parks, open space and play areas<br>Biodiversity and nature conservation<br>Allotments<br>Cemeteries and burial space<br>Flood defences, sustainable drainage, riverside improvements |
| Utility and energy                | Water supply and wastewater infrastructure<br>Waste and recycling infrastructure<br>Energy infrastructure<br>Digital infrastructure   |
| Emergency and security services   | Police service<br>Fire service<br>Ambulance service   |

### **3. Demonstrating constructive, active and ongoing cooperation**

3.1. This section of the Interim Duty Cooperate Statement provides an update on the engagement undertaken with the prescribed and other relevant bodies. It focusses on activities carried out since the first Regulation 18 consultation on the draft Rother Local Plan (2024) published for public consultation in April 2024. Therefore, this section should be read together with the Interim Engagement and Duty to Cooperate Statement (2024) and New Local Plan Early Engagement Document (2021), which include information on previous activities.

#### **Ongoing cooperation**

3.2. The Council has and will continue to engage with the prescribed Duty to Cooperate bodies during the preparation of the Local Plan. This includes through formal public consultation on the emerging Local Plan and supporting documents, external planning consultations, as well as by meetings or other correspondence (e.g. written correspondence via e-mail) with bodies.

3.3. Figures 3, 4 and 5 below help to demonstrate how the Council has engaged with the prescribed Duty to Cooperate bodies, along with the key matters and areas of cooperation between them (in the context of the strategic cross boundary matters set out in Section 2). This is in addition to statutory consultation carried out on the Rother Local Plan. It should be noted that discussions and cooperation are ongoing and consequently, the key matters may evolve as work on the Local Plan progresses.

3.4. A complete log of meetings and correspondence during the plan process will be set out by the Council in a future Duty to Cooperate Statement, at the Regulation 19 stage of the plan process.

#### **Statements of Common Ground**

3.5. The NPPF (2024) states that in order to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these.

3.6. The Council will seek to prepare Statements of Common Ground with the prescribed bodies as work on the plan progresses, and this matter has been raised by Rother District Council officers in Duty to Cooperate meetings.

### **Consultation on the Draft Rother Local Plan (2024)**

3.7. The Council published the Draft Rother Local Plan 2020-2040 (Regulation 18 Version), and supporting Evidence Base documents, for public consultation, for a 12-week period from 30 April to 23 July 2024.

3.8. Responses to consultation on the Draft Rother Local Plan (2024) were received from the following prescribed bodies:

- Environment Agency
- Historic England
- Natural England
- Homes England
- NHS Sussex Integrated Care Board
- NHS Property Services
- Highway Authority (East Sussex County Council)
- Marine Management Organisation

3.9. Responses on the Draft Rother Local Plan (2024) were received from the following authorities:

- East Sussex County Council
- Kent County Council
- Ashford Borough Council
- Eastbourne Borough Council
- Folkestone & Hythe District Council
- Hastings Borough Council
- Tunbridge Wells Borough Council
- Wealden District Council

3.10. In addition, responses were received from other stakeholders, bodies and infrastructure providers, including:

- High Weald AONB (National Landscape) Unit
- National Grid
- Network Rail

- Southern Water
- Sport England

3.11. Feedback received from the consultation has been summarised by Council officers and considered to inform the preparation of the emerging Local Plan. Further information is set out in the Interim Consultation Statement (2026), which is available to view on the Council's Local Plan evidence base webpage.

**External planning consultations**

3.12. As part of the Duty to Cooperate, the Council responds to planning and related public consultations on documents prepared by external stakeholders, including neighbouring authorities. Figure 3 below sets out the consultations the Council has formally responded to since April 2024, the date when the Draft Local Plan (2024) was published for Regulation 18 consultation.

3.13. The Council does not necessarily respond to all such public consultations it is invited to submit representations to. For example, it may not submit representations in instances where Council officers have reviewed the consultation material and consider that the project or proposals will not apply to or affect Rother district.

3.14. Please note that Figure 3 does not list all of the public consultations that the Council has responded to since April 2024, as the focus here is on planning policy consultations in the context of the Duty to Cooperate.

**Figure 3 – Rother District Council responses to consultations, from April 2024**

| <b>Authority or body</b>                              | <b>Consultation document</b>  | <b>Date response submitted</b> |
|---|---|--------------------------------|
| East Sussex County Council                            | Draft Local Nature Recovery Strategy  | 25 November 2025               |
| Ashford Borough Council                               | Draft Ashford Local Plan 2042   | 3 October 2025                 |
| Ministry of Housing, Communities and Local Government | Reform of Planning Committees: Technical Consultation   | 23 July 2025                   |
| Tunbridge Wells Borough Council                       | Tunbridge Wells Local Plan Main Modifications   | 25 April 2025                  |
| Department for Environment, Food and Rural Affairs    | Land Use Framework  | 23 April 2025                  |
| East Sussex County Council                            | Draft East Sussex Rail Strategy 2025-2050   | 21 March 2025                  |
| East Sussex County Council                            | Draft East Sussex Freight Strategy 2025-2050  | 21 March 2025                  |
| East Sussex County Council                            | East Sussex Rights of Way Access Plan   | 21 March 2025                  |
| Transport for South East                              | Transport Strategy for the South East   | 7 March 2025                   |
| Lewes District Council                                | Lewes Local Plan - Defining our policies and early site allocation proposals (Regulation 18)        | 26 February 2025               |
| Ministry of Housing, Communities and Local Government | Proposed Reforms to the National Planning Policy Framework and Other Changes to the Planning System | 23 September 2024              |
| Wealden District Council                              | Draft Wealden Local Plan (Regulation 18)  | 10 May 2024                    |

## **Planning Working Groups**

3.15. An important way in which the Council carries out the Duty to Cooperate is through participation in planning Working Groups. Figure 4 below sets out Working Groups that Council officers are a part of. Working Group meetings are held regularly and provide an opportunity for officers to discuss and progress Duty to Cooperate matters with the prescribed bodies and other stakeholders.

**Figure 4 – Working Groups with Rother District Council officer participation**

| <b>Name of working group</b>   | <b>Purpose of working group</b>  | <b>Frequency of meetings (approximate)</b> |
|--|--|--|
| Ashdown Forest Working Group   | To address the strategic cross boundary issue of air quality impacts on the Ashdown Forest Special Area of Conservation (SAC) that may arise from traffic associated with new development.   | Quarterly/bi-annually                      |
| Combe Valley Countryside Park (CVCP) Community Interest Company Stakeholders Group and Board | To provide strategic oversight and governance for the long-term management and enhancement of the CVCP, the group provides a forum for engagement, information-sharing and collaboration between the CIC and its wide range of partners including RDC.             | Quarterly                                  |
| Cuckmere and Pevensey Levels Catchment Partnership   | To take a joined-up approach to address problems across the river systems and maintain the rivers' health on a catchment scale.  | Quarterly/bi-annually                      |
| East Sussex Gypsy, Traveller and Travelling Showpeople Accommodation Working Group           | To work collaboratively on cross-boundary strategic planning issues relating to the provision of Gypsy, Traveller and Travelling Showpeople Sites.   | Every two months                           |
| East Sussex Local Plan Managers Group  | To discuss strategic planning issues across the county, attended by Local Plan managers from all of the District and Borough Councils and officers from ESCC.  | Every two months                           |
| East Sussex Planning for Health Working Group  | To work effectively and collaboratively to deliver the County Council's statutory public health responsibilities, and the Local Planning Authority's duties to deliver relevant elements of the National Planning Policy Framework through the planning system.    | Quarterly                                  |
| East Sussex Strategic Planning Group   | An officer and member-level group to discuss strategic planning matters across the county, progress on Local Plans and unmet development needs.  | Quarterly                                  |
| High Weald Joint Advisory Committee  | Provides strategic oversight and guidance on the collective management and conservation of the High Weald National Landscape. Oversees delivery of the HW Management Plan, promotes coordinated policy and investment, and supports partnership working across the | Twice per year                             |

|  |  |   |
|--|--|---|
|  | National Landscape The group also includes elected members.  |   |
| High Weald Officer Steering Group  | Supports the delivery of the High Weald National Landscape Management Plan through officer-level coordination and collaboration. The Group facilitates information sharing, technical input and alignment between partner authorities, helping to progress agreed actions, projects and policy approaches.   | Twice per year  |
| Rother Housing Development Group   | Led by the Housing Development Enabling team at Rother DC and attended by planning officers, annual events also include external stakeholders involved in housing delivery including Homes England, registered providers and parish councils. A group which aims to facilitate the delivery of housing in Rother, particularly affordable housing, including on allocated sites. | Monthly internal meetings (RDC officers) and annual cross-sector events |
| Sussex Local Nature Recovery Strategy Working Group and Supporting Authorities Group | The Working Group is a multi-sector group advising on the emerging Local Nature Recovery Strategies for Sussex. The Supporting Authorities Group comprises all the Local Authorities in the LNRS areas in accordance with the Environment (Local Nature Recovery Strategies) (Procedure) Regulations 2023.   | Monthly   |
| Sussex Strategic Planning Officers Group   | To discuss strategic planning matters across East and West Sussex.   | Quarterly   |

## Shared evidence base

- 3.16. As part of the Duty to Cooperate, the Council has prepared evidence base documents working together with other bodies.
- 3.17. Most notably, a significant amount of work has been undertaken jointly with Hastings Borough Council. This is to help ensure that the authorities' respective Local Plans are coordinated around the same evidence, where necessary and as much as reasonably practicable. It also reflects that Rother district and Hastings borough share Housing Market Area and a Functional Economic Market Area.
- 3.18. Joint preparation of evidence base documents with Hastings includes the Housing and Economic Development Needs Assessment (2020 and 2024), Sustainability Appraisal / Strategic Environmental Assessment Scoping Report (2021), Tourism

and Visitor Accommodation Study (emerging, expected 2026), and the Playing Pitch Strategy (PPS) & Built Facilities Strategy (2023) and emerging Stage E Review of the PPS.

- 3.19. As set out above, the Council is cooperating with all the other local planning authorities in East Sussex to identify and plan for the accommodation needs of gypsies, travellers and travelling showpeople. This is through a working group with an emerging Memorandum of Understanding, and also through shared work on the East Sussex Gypsy and Traveller Accommodation Assessment (GTAA), an update to which is being commissioned.
- 3.20. The Council, in collaboration with key transport stakeholders including East Sussex County Council and National Highways, has had a Shared Transport Evidence Base (STEB) produced which sets out an Interim Assessment on potential transport impacts of future growth. The latest version of this document is from March 2022. The STEB will be taken forward and used to inform the next stage of transport assessment for the new Local Plan, using the East Sussex Countywide Transport Model. The Council has also worked independently with East Sussex County Council on a feasibility study for West Bexhill.

#### **Requests made by the Council regarding unmet housing need**

- 3.21. As noted in Section 2 of this Interim Duty to Cooperate Statement, meeting housing needs is a key strategic cross boundary matter. This is particularly in the context of the Government's Local Housing Need (LHN) figure for Rother, which is calculated using the 'standard method' set out in the NPPF (2024) and associated Planning Practice Guidance.
- 3.22. In June 2024, in association with the publication of the Regulation 18 version of the Draft Rother Local Plan, the Council wrote to seven neighbouring and other close-by authorities to formally request that they consider accommodating potential unmet housing needs arising in Rother. These authorities confirmed that were unable to, or not anticipating being able to, take on housing needs from Rother due to either not being able to meet their own needs in full, or not having any additional land capacity.
- 3.23. This matter has been, and will continue to be, discussed by the Council's officers through the Duty to Cooperate process, including meetings with neighbouring

authorities. With the publication of the Draft Rother Local Plan – Development Strategy and Site Allocations (2026), the Council has an updated position on the anticipated supply of suitable and available land for future development, along with indicative figures for housing supply and the ‘gap’ or shortfall to the Government’s current LHN figure for Rother district, so to inform discussions on unmet housing need.

### **Record of key matters and cooperation with prescribed bodies**

- 3.24. To help demonstrate compliance with the Duty to Cooperate, Figure 5 below provides record of key matters and cooperation with the prescribed bodies.
- 3.25. It should be noted that Figure 5 provides an ‘abridged’ record of meetings and correspondence, focussing on activities since the first Regulation 18 consultation on the Draft Rother Local Plan commenced in April 2024. Previous activities are recorded in the Engagement and Duty to Cooperate Statement (2024), and New Local Plan Early Engagement Document (2021) documents respectively.
- 3.26. Figure 5 provides a record of the most recent meetings held with the respective bodies. Meetings were held with most of the prescribed bodies. In the few instances where there was no meeting held, Figure 5 denotes the last date of correspondence where a request to meet was made by Rother District Council officers. There will also be situations where additional correspondence has been made subsequent to the meetings noted, for example, follow up emails between Council officers and a body, however these are not noted at this time.
- 3.27. Finally, there are some matters that are part of the Council’s regular engagement with the prescribed bodies but are not signposted in the table. These include standard agenda items for Duty to Cooperate meetings (e.g., updates on authorities respective Local Plans and project plans, where relevant); discussions around the preparation of Statements of Common Ground; and general “housekeeping” items.
- 3.28. A complete record of meetings and activities will be made available in a future Duty to Cooperate Statement, which will be published at the Regulation 19 stage of the plan process.

**Figure 5 – Abridged record of meetings and correspondence April 2024 – January 2026<sup>2</sup>**

| <b>Prescribed body or Authority</b> | <b>Summary of key cross boundary matters</b>  | <b>Key evidence of co-operation April 2024 to January 2026 (note this is not a comprehensive list)</b>  | <b>Date of last meeting</b><br>(or if none, date of last correspondence marked “*”) |
|-------------------------------------|---|---|---|
| Ashford Borough Council (ABC)       | <ul style="list-style-type: none"> <li>- Meeting housing needs</li> <li>- Meeting employment needs</li> <li>- Meeting gypsy and traveller accommodation needs</li> <li>- Cross-boundary highway matters</li> <li>- Dungeness complex of protected habitats sites</li> </ul> | <ul style="list-style-type: none"> <li>- Duty to Co-operate meeting</li> <li>- ABC Representations to Regulation 18 consultation on draft Rother Local Plan (2024)</li> <li>- RDC request to ABC to accommodate unmet needs arising in Rother (2024) and ABC's response</li> <li>- RDC representation to Draft Ashford Local Plan 2042 Regulation 18 Consultation (2025)</li> <li>- RDC confirmation it has reviewed, but will not submit representations to, ABC consultation on Queens Platinum Jubilee Park masterplan (2025)</li> </ul> | 11 Aug 2025   |
| Brighton & Hove City Council (BHCC) | <ul style="list-style-type: none"> <li>- Waste and Minerals, with East Sussex County Council (joint Waste and Minerals Local Plan)</li> </ul>   | Both RDC and BHCC are members of the East Sussex Local Plan Managers Group and  | Regular meetings of the Groups are ongoing, in line                                 |

<sup>2</sup> This broadly reflects the period between the publication of the Draft Rother Local Plan (2024) and Draft Rother Local Plan – Development Strategy and Sites Allocations (2026) Regulation 18 public consultation documents, respectively. Activities and related information prior to this period are set out in the Engagement and Duty to Cooperate Statement (April 2024).

|  |   |  |  |
|--|---|--|--|
|  | <ul style="list-style-type: none"> <li>- Strategic Planning Matters affecting East Sussex and Brighton &amp; Hove</li> </ul>  | the East Sussex Strategic Planning Group, as detailed in Figure 4.   | with information in Figure 4   |
| Civil Aviation Authority                           | <ul style="list-style-type: none"> <li>- Strategic planning matters relating to civil aviation</li> </ul>   | <ul style="list-style-type: none"> <li>- No response to request for meeting.</li> </ul>  | 1 Sept 2025*   |
| Cuckmere and Pevensey Levels Catchment Partnership | <ul style="list-style-type: none"> <li>- Water environment</li> <li>- Biodiversity</li> <li>- Flood risks</li> <li>- Water quality</li> </ul>   | <ul style="list-style-type: none"> <li>- RDC attendance at Drought Plan Workshop (21 May 2025) and Partnership meetings</li> </ul>   | 21 May 2025  |
| Eastbourne Borough Council (EBC)                   | <ul style="list-style-type: none"> <li>- Meeting housing needs</li> <li>- Meeting gypsy and traveller accommodation needs</li> <li>- Water cycle matters including impacts on Pevensey Levels protected habitats sites</li> <li>- Cross-boundary highway matters</li> </ul> | <ul style="list-style-type: none"> <li>- Invitation from EBC to jointly commission a Water Cycle Study with EBC and Wealden District Council (which RDC has declined)</li> <li>- EBC Representations to Regulation 18 consultation on draft Rother Local Plan (2024)</li> <li>- RDC request to EBC to accommodate unmet needs arising in Rother (2024) and EBC's response</li> <li>- Both RDC and EBC are members of the East Sussex Local Plan Managers Group and the East Sussex Strategic Planning Group, as detailed in Figure 4</li> <li>- Both RDC and EBC are members of the East Sussex Gypsy, Traveller and Travelling Showpeople (GTTSP) Accommodation Working Group, as detailed in Figure 4</li> </ul> | Regular meetings of the Groups are ongoing, in line with information in Figure 4 |
| East Sussex County Council (ESCC)                  | <ul style="list-style-type: none"> <li>- Transport, including highways and buses</li> <li>- Rights of Way</li> <li>- Cycling and Walking infrastructure</li> </ul>  | <ul style="list-style-type: none"> <li>- Regular correspondence and meetings with Highway Authority colleagues in relation to highways impacts of</li> </ul>   | Regular meetings of the Groups are ongoing, in line                              |

|                         |   |  |                              |
|-------------------------|---|--|------------------------------|
|                         | <ul style="list-style-type: none"> <li>- Education including school place planning</li> <li>- Public health and wellbeing</li> <li>- Local Nature Recovery Strategy (ESCC is the responsible authority)</li> </ul>  | <ul style="list-style-type: none"> <li>- development and transport modelling to support the Local Plan, using county-wide model</li> <li>- RDC is a member of the East Sussex Planning for Health Working Group, led by ESCC</li> <li>- RDC is a supporting authority to, and member of the LNRS working group</li> <li>- RDC representations to the Draft Local Nature Recovery Strategy for East Sussex and Brighton &amp; Hove</li> <li>- RDC annual response to ESCC annual request for information on planned housing to inform Pupil Forecasting</li> <li>- RDC response to consultations on East Sussex Draft Rail Strategy and Draft Freight Strategy</li> <li>- ESCC Representations to Regulation 18 consultation on draft Rother Local Plan (2024)</li> <li>- Both RDC and ESCC are members of the East Sussex Local Plan Managers Group and the East Sussex Strategic Planning Group, as detailed in Figure 4</li> </ul> | with information in Figure 4 |
| Environment Agency (EA) | <ul style="list-style-type: none"> <li>- Flooding, including Strategic Flood Risk Assessment</li> <li>- Proposed site allocations and impact(s) on the Pevensey Levels protected habitats sites</li> <li>- Designation of Coastal Change Management Area in the Local Plan, and EA remit on this</li> </ul> | <ul style="list-style-type: none"> <li>- EA representations to Regulation 18 consultation on draft Rother Local Plan (2024)</li> <li>- Duty to Co-operate meetings</li> <li>- EA advice to RDC on progressing Strategic Flood Risk Assessment</li> </ul>   | 1 Oct 2025                   |

|  |   |  |             |
|--|---|--|-------------|
|  | <ul style="list-style-type: none"> <li>- Other water management matters including flood defences, wastewater, drainage and associated infrastructure</li> </ul>   |  |             |
| Folkestone and Hythe District Council (FHDC) | <ul style="list-style-type: none"> <li>- Meeting housing needs</li> <li>- Preparation of a Sustainable Access and Recreation Management Strategy (SARMS) update, to be prepared jointly between the authorities, to address impacts on the Dungeness complex of protected habitats sites</li> <li>- Meeting employment needs</li> <li>- Meeting gypsy and traveller accommodation needs</li> <li>- Cross-boundary highway matters</li> </ul>  | <ul style="list-style-type: none"> <li>- RDC request to FHDC to accommodate unmet needs arising in Rother and FHDC's reply</li> <li>- FHDC representations to Regulation 18 consultation on draft Rother Local Plan (2024)</li> <li>- Duty to co-operate meetings</li> <li>- Meetings to discuss SARMS update</li> </ul>   | 12 Jan 2026 |
| Hastings Borough Council (HBC)               | <ul style="list-style-type: none"> <li>- Meeting housing needs</li> <li>- Meeting employment needs</li> <li>- Meeting gypsy and traveller accommodation needs</li> <li>- Cross-boundary highway matters</li> <li>- Potential development sites/ extant and emerging site allocations particularly those located in proximity to the district/borough boundary</li> <li>- Strategic gap</li> <li>- Combe Valley Countryside Park, included protected habitats sites</li> <li>- Hastings Country Park and Nature reserve, including protected habitats sites</li> </ul> | <ul style="list-style-type: none"> <li>- Duty to co-operate meetings</li> <li>- Requests and responses between both authorities for assistance with meeting housing needs</li> <li>- HBC representations to Regulation 18 consultation on draft Rother Local Plan (2024)</li> <li>- HBC request for RDC to assist in meeting gypsy and traveller site need and RDC's response</li> <li>- Both RDC and HBC are members of the East Sussex Local Plan Managers Group, the East Sussex Strategic Planning Group, and the East Sussex Gypsy, Traveller and Travelling</li> </ul> | 13 Jan 2026 |

|   |   |  |              |
|---|---|--|--------------|
|   | <ul style="list-style-type: none"> <li>- Water issues, including flood risks, impacts on water and wastewater and their infrastructure</li> <li>- Coastal change and land instability</li> <li>- Coastal Change Management Area</li> </ul>  | <ul style="list-style-type: none"> <li>- Showpeople (GTTSP) Accommodation Working Group, as detailed in Figure 4</li> <li>- Joint commissioning and preparation of evidence base documents (Housing and Economic Development Needs Assessment update, Tourism and Visitor Accommodation Study, Playing Pitch Strategy and Built Facilities Strategy - Stage E Review)</li> </ul> |              |
| High Weald National Landscape (HWNL) Unit | <ul style="list-style-type: none"> <li>- Furthering the statutory purpose of the High Weald National Landscape</li> <li>- Effects of development and proposed site allocations on the National Landscape</li> <li>- Evidence base on HWNL to support Local Plan policies</li> </ul> | <ul style="list-style-type: none"> <li>- Meeting to discuss proposed site allocations</li> <li>- RDC attendance of meetings of the High Weald Joint Advisory Committee and the High Weald Officer Steering Group, as detailed in Figure 4</li> </ul>   | 10 Nov 2025  |
| Historic England (HE)                     | <ul style="list-style-type: none"> <li>- Emerging site allocations and implications for historic environment</li> <li>- Evidence base on historic environment to support Local Plan policies</li> </ul>   | <ul style="list-style-type: none"> <li>- HE Representations to Regulation 18 consultation on draft Rother Local Plan (2024)</li> <li>- Duty to cooperate meeting</li> </ul>  | 22 Oct 2025  |
| Homes England                             | <ul style="list-style-type: none"> <li>- Development sites</li> <li>- Meeting housing need, including affordable housing</li> </ul>   | <ul style="list-style-type: none"> <li>- Homes England Representations to Regulation 18 consultation on draft Rother Local Plan (2024)</li> <li>- Meetings to discuss individual sites (extant and proposed site allocations)</li> <li>- Attendance at Rother Housing Development Event 28/11/25</li> </ul>  | 30 Sept 2025 |
| Kent County Council (KCC)                 | <ul style="list-style-type: none"> <li>- Meeting housing need</li> <li>- Cross-boundary transport matters</li> </ul>  | <ul style="list-style-type: none"> <li>- No response to request for meeting.</li> </ul>  | 2 Sept 2025* |

|                                      |   |  |  |
|--------------------------------------|---|--|--|
|                                      | <ul style="list-style-type: none"> <li>- Cross-boundary education matters</li> <li>- Cross-boundary Rights of Way matters</li> <li>- Cross-boundary environmental matters, e.g. Dungeness Complex of protected habitats sites</li> </ul>  | <ul style="list-style-type: none"> <li>- KCC Representations to Regulation 18 consultation on draft Rother Local Plan (2024)</li> </ul>  |  |
| Lewes District Council (LDC)         | <ul style="list-style-type: none"> <li>- Meeting housing needs</li> <li>- Meeting gypsy and traveller accommodation needs</li> <li>- Cross-boundary highway matters</li> </ul>  | <ul style="list-style-type: none"> <li>- LDC Representations to Regulation 18 consultation on draft Rother Local Plan (2024)</li> <li>- RDC Representations to Regulation 18 consultation on draft Lewes Local Plan (2025)</li> <li>- RDC request to LDC to accommodate unmet needs arising in Rother (2024) and LDC's response</li> <li>- Both RDC and LDC are members of the East Sussex Local Plan Managers Group, the East Sussex Strategic Planning Group, and the East Sussex Gypsy, Traveller and Travelling Showpeople (GTTSP) Accommodation Working Group, as detailed in Figure 4</li> </ul> | Regular meetings of the Groups are ongoing, in line with information in Figure 4 |
| Marine Management Organisation (MMO) | <ul style="list-style-type: none"> <li>- South Inshore and Offshore Marine Plan - how to ensure this is adequately addressed by the Local Plan</li> <li>- Designation of Coastal Change Management Area in the Local Plan</li> <li>- Dungeness Complex of protected habitats sites</li> </ul> | <ul style="list-style-type: none"> <li>- MMO Representations to Regulation 18 consultation on draft Rother Local Plan (2024)</li> <li>- Duty to cooperate meeting</li> </ul>   | 2 Oct 2025   |

|   |   |  |               |
|---|---|--|---------------|
| National Highways (NH)                  | <ul style="list-style-type: none"> <li>- Circular 0/2022 and NPPF vision-led approach to transport planning – how to ensure this is adequately addressed by the Local Plan</li> <li>- Transport modelling for the Local Plan and engagement with National Highways and ESCC to ensure robust evidence (including involvement as critical friend, e.g. reviewing brief, scoping, modelling inputs, etc.)</li> <li>- Draft Infrastructure Delivery Plan and opportunities for National Highways to input into the evidence</li> <li>- Funding mechanisms and National Highways role/remit and expectations</li> </ul> | <ul style="list-style-type: none"> <li>- Duty to cooperate meeting</li> <li>- NH Representations to Regulation 18 consultation on draft Rother Local Plan (2024)</li> <li>- NH response to RDC request for site-specific comments to inform draft site allocations</li> </ul>                                      | 5 Sept 2025   |
| Natural England                         | <ul style="list-style-type: none"> <li>- Protected habitats sites</li> <li>- Local Plan Habitats Regulations Assessment advice</li> <li>- High Weald National Landscape</li> <li>- Sustainable Access and Recreation Management Strategy (SARMS) update</li> <li>- </li> </ul>  | <ul style="list-style-type: none"> <li>- NE Representations to Regulation 18 consultation on draft Rother Local Plan (2024)</li> <li>- Duty to cooperate meeting</li> <li>- Meetings on specific issues and sites, e.g. Sustainable Access and Recreation Management Strategy (SARMS) update, with FHDC</li> </ul> | 7 Oct 2025    |
| NHS England / NHS Integrated Care Board | <ul style="list-style-type: none"> <li>- Healthcare facilities, requirements and provision</li> <li>- Public health</li> </ul>  | <ul style="list-style-type: none"> <li>- No response to request for a meeting</li> <li>- NHS Sussex and NHS Property Services Representations to Regulation 18 consultation on draft Rother Local Plan (2024)</li> </ul>   | 22 Sept 2025* |
| Office of Road and Rail                 | <ul style="list-style-type: none"> <li>- Strategic Road Network</li> <li>- Railway safety</li> </ul>  | <ul style="list-style-type: none"> <li>- No response to request for meeting</li> </ul>   | 1 Sept 2025*  |

|   |  |  |   |
|---|--|--|---|
| South Downs National Park Authority (SDNPA) | <ul style="list-style-type: none"> <li>- Meeting housing needs</li> <li>- Meeting gypsy and traveller accommodation needs</li> <li>- Cross-boundary highway matters</li> </ul>   | <ul style="list-style-type: none"> <li>- Both RDC and SDNPA are members of the East Sussex Local Plan Managers Group, the East Sussex Strategic Planning Group, and the East Sussex Gypsy, Traveller and Travelling Showpeople (GTTSP) Accommodation Working Group, as detailed in Figure 4</li> <li>- RDC response to SDNPA's request for help with meeting unmet housing and gypsy and traveller site need (Jan 2026)</li> </ul> | Regular meetings of the Groups are ongoing, in line with information in Figure 4      |
| South East Local Enterprise Partnership     | <ul style="list-style-type: none"> <li>- Confirmation that SELEP ceased operations in April 2024, received on 12 Sept 2025</li> <li>- SELEP main functions (strategic economic planning, delivery of government programmes, business representation) absorbed by ESCC</li> </ul> | <ul style="list-style-type: none"> <li>- Not applicable as SELEP has ceased operations.</li> </ul>   | 12 Sept 2025*   |
| Sport England                               | <ul style="list-style-type: none"> <li>- Playing Pitch Strategy and Stage E Review</li> <li>- Impact of development and site allocations on playing fields and pitches</li> </ul>  | <ul style="list-style-type: none"> <li>- Playing Pitch Strategy and Built Facilities Strategy - Stage E Review, Steering Group Meeting</li> <li>- Sport England Representations to Regulation 18 consultation on draft Rother Local Plan (2024)</li> </ul>   | 15 Jul 2025   |
| Sussex Nature Partnership                   | <ul style="list-style-type: none"> <li>- Emerging Sussex Local Nature Recovery Strategy</li> <li>- Biodiversity issues in relation to emerging Local Plan policies and site allocations, including effects on habitats, protected sites and protected species</li> </ul>         | <ul style="list-style-type: none"> <li>- Sussex Nature Partnership, as part of Local Nature Recovery Strategy Working Group; with RDC part of Working Group and Supporting Authorities Group</li> <li>- Monthly webinar series on nature conservation matters in relation to planning</li> </ul>   | Regular meetings of the LNRS Groups are ongoing, in line with information in Figure 4 |

|  |  |  |             |
|--|--|--|-------------|
| Tunbridge Wells Borough Council (TWBC) | <ul style="list-style-type: none"> <li>- Transport matters, including modelling for the Local Plan</li> <li>- Meeting housing needs</li> <li>- Meeting employment needs</li> <li>- Meeting gypsy and traveller accommodation needs</li> <li>- Bewl Water</li> <li>- Rother Local Plan draft site allocations, especially sites in proximity to district/borough boundary (e.g. at Flimwell)</li> <li>-</li> </ul>  | <ul style="list-style-type: none"> <li>- Duty to Cooperate meetings</li> <li>- TWBC Representations to Regulation 18 consultation on draft Rother Local Plan (2024)</li> <li>- RDC Representations to TWBC's consultation on Main Modifications (2025)</li> <li>- RDC request to TWBC to accommodate unmet needs arising in Rother (2024) and TWBC's response</li> </ul>   | 16 Dec 2025 |
| Wealden District Council (WDC)         | <ul style="list-style-type: none"> <li>- Transport matters, including modelling for the Local Plan</li> <li>- Meeting housing needs</li> <li>- Meeting employment needs</li> <li>- Meeting gypsy and traveller accommodation needs</li> <li>- Site allocations including sites in proximity to the district boundary</li> <li>- Water cycle matters including invitation to jointly commission a Water Cycle Study (which RDC has declined)</li> <li>- Bewl Water</li> <li>- HRA matters including Pevensey Levels and Ashdown Forest</li> <li>- Designation of Coastal Change Management Area(s)</li> </ul> | <ul style="list-style-type: none"> <li>- Duty to Cooperate meetings</li> <li>- WDC Representations to Regulation 18 consultation on draft Rother Local Plan (2024)</li> <li>- RDC Representations to WDC's Regulation 18 consultation on draft Wealden Local Plan (2024)</li> <li>- RDC request to WDC to accommodate unmet needs arising in Rother (2024) and WDC's response</li> <li>- Both RDC and WDC are members of the East Sussex Local Plan Managers Group, the East Sussex Strategic Planning Group, and the East Sussex Gypsy, Traveller and Travelling Showpeople (GTTSP) Accommodation Working Group, as detailed in Figure 4</li> </ul> | 19 Dec 2025 |

|   |   |  |   |
|---|---|--|---|
| <p>Infrastructure providers and related stakeholders (as identified in the Draft Infrastructure Delivery Plan).</p> | <ul style="list-style-type: none"> <li>- Timely delivery of infrastructure to support levels of growth planned in Rother, as set out in the adopted and emerging Local Plan</li> <li>- Infrastructure funding, including funding mechanisms (CIL and S106)</li> <li>- Infrastructure Delivery Plan (IDP)</li> </ul> | <ul style="list-style-type: none"> <li>- Representations to Regulation 18 consultation on draft Rother Local Plan (2024) from stakeholders, including: Environment Agency, East Sussex County Council, Marine Management Organisation, National Grid, National Highways, Network Rail, NHS, Southern Water, Sport England</li> <li>- Meetings held with some stakeholders as part of Working Groups, as detailed in Figure 4.</li> </ul> | <p>Meeting with some stakeholders, as part of Working Groups, as set out in Figure 4.</p> <p>Previous engagement with stakeholders has informed the latest Draft IDP (Jan 2026), which will be circulated to relevant bodies and providers for comments and inputs.</p> |
|---|---|--|---|



**Rother District Council**

Town Hall  
London Road  
Bexhill-on-Sea  
East Sussex  
TN39 3JX