

Rother District Local Plan 2025 - 2042

# **Interim Consultation Statement**

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**January 2026**

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## Abbreviations

AONB	Area of Outstanding Natural Beauty (National Landscape)
BNG	Biodiversity Net Gain
CIL	Community Infrastructure Levy
HEDNA	Housing and Economic Development Needs Assessment
HELAA	Housing and Economic Land Availability Assessment
HRA	Habitats Regulations Assessment
LDS	Local Development Scheme
NPPF	National Planning Policy Framework
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SEA	Strategic Environmental Assessment
SFRA	Strategic Flood Risk Assessment

# 1. Introduction

## Purpose

- 1.1. This Interim Consultation Statement has been prepared in support of the new Rother Local Plan. It sets out how Rother District Council (“the Council”) has undertaken public consultation and engagement to-date during the plan’s production. It also provides information on the main issues raised through this process, and how representations made to the consultation have been considered by the Council in preparing the Local Plan.
- 1.2. This document pertains to the consultation undertaken on the **Rother Local Plan – Draft (Regulation 18) Version (April 2024)**, i.e., Draft Local Plan (2024), and associated evidence base documents, which were subject to a Regulation 18 stage<sup>1</sup> public consultation, for a period a 12-weeks from 30 April to 23 July 2024. It is being published to provide an update on consultation previously undertaken, to support the second Regulation 18 consultation on the Council’s draft Local Plan (January 2026).

A final Consultation Statement will be published later, at the Regulation 19 stage of the plan-making process. This will include a detailed schedule summarising all representations received to both of the Regulation 18 consultations on the Draft Rother Local Plan (2024 and 2026) and the Council’s response to these. It will also set out the main issues raised during the consultations and how these have been taken into account during the preparation of the plan.

## Policy and legislative requirements

- 1.3. The Government’s National Planning Policy Framework (NPPF) (December 2024) states that plans should be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees.<sup>2</sup>

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<sup>1</sup> As set out by The Town and Country Planning (Local Planning) (England) Regulations 2012, as amended.

<sup>2</sup> NPPF (December 2024), paragraph 16.

- 1.4. This Interim Consultation Statement has been prepared having regard to Regulation 22(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), which requires the Council to publish a statement setting out:
- i. Which bodies and persons the local planning authority invited to make representations under Regulation 18.
  - ii. How those bodies and persons were invited to make representations under Regulation 18.
  - iii. A summary of the main issues raised by the representations made pursuant to Regulation 18.
  - iv. How any representations made pursuant to Regulation 18 have been taken into account.
  - v. If representations were made pursuant to Regulation 20, the number of representations made and a summary of the main issues raised in those representations.
- 1.5. To ensure compliance with the legislative and policy requirements the Council will prepare an additional Consultation Statement, including at the Regulation 19 stage of the plan process, when the 'proposed submission version' of the Local Plan is published.

### **Statement of Community Involvement**

- 1.6. Under Section 19(3) of the Planning and Compulsory Purchase Act 2004, in preparing local development documents, local planning authorities must comply with the Statement of Community Involvement (SCI).
- 1.7. The SCI is prepared by the Council and sets out how and when it will engage with stakeholders and the wider community to ensure that everyone can participate in the planning process, including during the production of the Local Plan. The SCI sets out the different types of statutory consultation bodies which are grouped as specific, general and other bodies.
- 1.8. The SCI is subject to periodic review and updating. At the time of the Regulation 18 public consultation on the Draft Local Plan (2024), held from 30 April to 23 July

2024, the adopted SCI comprised the Rother SCI (January 2022) and SCI Addendum (January 2024)<sup>3</sup>.

- 1.9. The SCI is available to view online at the Council's [planning webpages](#).

### **Duty to Cooperate**

- 1.10. The Duty to Cooperate places a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan preparation in the context of strategic cross boundary matters.<sup>4</sup> The NPPF (2024) references the Duty to Cooperate and provides further details on the nature of strategic and cross-boundary matters that local authorities should address through the plan process. The Council will seek to ensure it satisfies these requirements, including through the preparation of Statements of Common Ground.
- 1.11. The Council has published an Engagement and Duty to Cooperate Statement – Draft (Regulation 18) Version (April 2024), and an Interim Duty to Cooperate Statement (2026). These are available to view online from the Council's new [Local Plan webpage](#) and should be referred to for further information.
- 1.12. Additional Duty to Cooperate Statements will be prepared as work on the plan progresses. Together the statements will help to demonstrate how the Council has satisfied the relevant legal requirements.
- 1.13. It is noted that 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.

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<sup>3</sup> The SCI Addendum (January 2024) pertains to the public speaking scheme at Planning Committee.

<sup>4</sup> Section 110 of the Localism Act, incorporated into Section 33A of the Planning and Compulsory Purchase Act 2004.



## 2. Regulation 18 consultation process

- 2.1. The Council undertook targeted early engagement with statutory bodies from 21 August to 16 October 2020. Following which, the Council carried out further early-stage engagement with a wider range of key stakeholders to inform the preparation of the Local Plan. The main intention of these exercises was to set out the approach to preparing the new plan. This included the identification of key strategic issues to be assessed, how key stakeholders and neighbouring authorities may be involved at an early stage, and to assist with meeting the requirements of the Duty to Cooperate.
- 2.2. Full details of this early-stage engagement are set out in the New Local Plan – Early Engagement Document (April 2021), which should be referred to for further information.

### **Call for Sites**

- 2.3. As part of the early-stage engagement on the new Local Plan, the Council has carried out a 'Call for Sites' exercise. The Call for Sites is used to inform the Housing and Economic Land Availability Assessment (HELAA) and assists the Council in identifying land that may be suitable for development, and therefore merits consideration for the Local Plan.
- 2.4. The Call for Sites was launched on 12 October 2020, and the exercise initially ran to 7 December 2020; following which it has remained open. It was re-advertised to the public in June 2025. As well as being publicised locally and on the Council's website, the following groups received direct notification of the Call for Sites:
  - Landowners and land promoters
  - Developers and planning agents
  - Local property agents (residential and commercial)
  - Town and parish councils
  - Local Enterprise Partnership
  - Businesses and relevant local interest groups

- Statutory bodies and local authorities
- 2.5. These groups were invited to submit sites for consideration by the Council. Respondents were asked to: complete a standard site submission form; supply a site location plan; and include any relevant supporting evidence, if available.
  - 2.6. As part of the Call for Sites exercise, the Council has invited submissions separately for Gypsy, Traveller and Travelling Showpeople Sites (to address accommodation requirements for this group) as well as for Nature Sites (to contribute towards Biodiversity Net Gain). The Council has set up dedicated Call for Sites webpages and submission forms for these.
  - 2.7. All submissions to the Call for Sites exercise have been, or will be, considered during the preparation of the Local Plan, as long as it remains open.

### **When we consulted**

- 2.8. The Regulation 18 consultation on the Draft Local Plan (2024) and associated supporting documents was held during a 12-week period from 5:00 pm on Tuesday, 30 April to 5:00 pm on Tuesday, 23 July 2024.

### **What we consulted on**

- 2.9. During the Regulation 18 consultation, the Council invited the public to submit representations on the Rother Local Plan – Draft (Regulation 18) Version (April 2024).
- 2.10. The new Local Plan, once adopted, will form part of the statutory development plan for Rother district, and will update and replace the adopted Core Strategy (2014) and Development and Site Allocations Local Plan (2019).
- 2.11. The Draft Local Plan sets out the long-term planning and development framework for Rother, which is focussed on delivering sustainable development. It includes proposals for a future vision, key objectives, principles and planning policies for the district. It also sets out a spatial strategy and associated strategic policies to help give effect to it, together with development management policies. The Draft Local Plan will also include site allocation policies. However, the plan that was the subject of the Regulation 18 consultation from April to July 2024 did not include site allocations.

2.12. In addition, in 2024, the Council invited the public to submit comments on selected Supporting Evidence Base Documents for the Local Plan, as follows:

- Sustainability Appraisal Interim Report (April 2024)
- Habitats Regulations Assessment (March 2024)
- Draft Housing and Economic Land Availability Assessment (HELAA) (April 2024)

## **How we consulted**

### **Notification and publicity**

2.13. A variety of methods were used to notify the public about the Regulation 18 consultation, as set out below.

2.14. The Council's planning service maintains a Consultation Database<sup>5</sup> that contains the names and contact details of individuals and organisation who have informed the Council they wish to be made aware of planning consultations. The database includes contacts of statutory consultation bodies, discussed later in this report. Written notifications with information about the Regulation 18 consultation were sent to all contacts on the database, as of that time. Email notifications were sent where email addresses had been provided by contacts, otherwise letters were sent by post.

2.15. A public notice was published on the Council's website and local newspapers. These newspapers were Rye & Battle Observer, Bexhill Observer, and Kent & East Sussex Courier. The Council also provided local media outlets with a press release.

2.16. Notifications were also sent out through the Council's 'My Alerts', a weekly email service that provides information for residents and businesses in Rother registered to the service.

2.17. Social media posts were made on the Council's Facebook, Twitter (now X) and LinkedIn pages to notify users of the start of the consultation period, as well as a

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<sup>5</sup> Information on the Consultation Database is held in accordance with the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

subsequent post near the end of the consultation period, as a final reminder of the consultation closing.

- 2.18. For public exhibitions (discussed below), information was posted on the Council's website, while posters for each exhibition were sent out to the relevant parish councils for them to advertise this locally. In addition, local residents received details of upcoming exhibitions in the area through the Council's My Alerts notifications.

### **Making documents available for inspection**

- 2.19. The above noted consultation materials, together with information about the Local Plan and the Regulation 18 consultation, were made available online at the Council's Local Plan consultation webpage.<sup>6</sup> From this, links were provided to the full suite of evidence base documents.

- 2.20. Dedicated online consultation webpages were also created for the Draft Local Plan and Supporting Evidence Base Documents<sup>7</sup> respectively, which could be accessed from the Council's website and the main Local Plan consultation webpage. These dedicated webpages provided opportunities for the public to view the consultation documents and respond directly to these online.

- 2.21. Hard copies of the Draft Local Plan, and the Consultation Response Form, were also made available for inspection at the Council's principal office, selected libraries and community libraries, as set out below:

- Council office: Bexhill Town Hall
- Libraries: Battle, Bexhill, Hastings, Heathfield, Hollington, Rye, Wadhurst
- Community libraries: Northiam, Ore, Ticehurst

- 2.22. At Bexhill Town Hall, a public access computer was made available for those wishing to view the Draft Local Plan, Consultation Response Form and supporting evidence base documents online.

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<sup>6</sup> <http://www.rother.gov.uk/draftlocalplan>

<sup>7</sup> Sustainability Appraisal Interim Report, Habitats Regulations Assessment and Draft HELAA.

- 2.23. In accordance with the Statement of Community Involvement, hard copies of documents could be purchased at cost price, and upon request, made available in large print, Braille, on audio tape or CD, and translated into other languages.

### **Public exhibitions**

- 2.24. A series of public exhibitions, 13 in total, were held around the district to raise awareness of the Draft Local Plan and consultation opportunities. The exhibitions were attended by Council planning officers who were available to answer questions and provide further information. Details of the exhibition programme are set out in the table below.

Area	Venue	Date	Time
Rye	Tilling Green Community Centre	21 May 2024	2 pm – 6 pm
Battle	Battle Memorial Hall	22 May 2024	3 pm – 7 pm
Bexhill	Pebsham Community Hub	28 May 2024	3 pm – 7 pm
Brede	Brede Village Hall	04 June 2024	2 pm – 6 pm
Ticehurst	Ticehurst Village Hall	06 June 2024	3 pm – 7 pm
Bexhill	Beulah Baptist Church	12 June 2024	3 pm – 7 pm
Rye	Rye Community Centre	13 June 2024	3 pm – 7 pm
Battle	Battle Memorial Hall	19 June 2024	3 pm – 7 pm
Westfield	Westfield Community Hall	22 June 2024	1:30 pm – 5:30 pm
Bexhill	St Marks Church Hall	25 June 2024	2:30 pm – 6:30 pm
Bexhill	The Pelham	02 July 2024	3 pm – 7 pm
Fairlight	Fairlight Village Hall	11 July 2024	3 pm – 7 pm
Robertsbridge	Robertsbridge Village Hall	12 July 2024	3pm – 7pm

### **Meetings/focus groups**

- 2.25. In addition, during the Regulation 18 consultation period, the Council sought to meet with each Parish and Town Council in the district and was successful in meeting with all except two. Officers visited the respective Parish and Town Councils and gave presentations on the draft Local Plan including information on the consultation process and answering questions. On many occasions this was undertaken at a public meeting, advertised in advance by the Parish/ Town Council, with members of the public also present.
- 2.26. Council officers also attended several meetings with local interest groups as and when requested during the consultation period.

### **Making representations**

2.27. The Council invited the public to make representations to the Draft Local Plan Regulation 18 consultation through various means, as follows:

- By using the Council's dedicated consultation webpage online;
- By using the Consultation Response Form and submitting this by email or post;
- By email; and
- By post.

### **Who we consulted**

2.28. Planning legislation requires the Council to consult with prescribed consultation bodies during the production of the Local Plan. These bodies are broadly categorised as general consultation bodies and specific consultation bodies. Furthermore, legislation requires the Council to consult residents or those carrying out business in the district, as it considers appropriate.

2.29. Further details on the general and specific consultation bodies relevant to Rother District Council are set out in the adopted Statement of Community Involvement, Appendix 1, which should be referred to for further information. The bodies are also summarised below, in some cases with examples of organisations.

2.30. The Council consulted with the above noted prescribed bodies, where appropriate, during the Regulation 18 consultation on the Draft Local Plan. The next section of this report (Section 3) provides information on who responded, and details of representations received from them.

### **General consultation bodies**

- Voluntary bodies some or all of whose activities benefit any part of the district
- Bodies that represent the interests of different racial, ethnic or national groups in the district
- Bodies that represent the interests of different religious groups in the district
- Bodies that represent the interests of disabled persons in the district

- Bodies that represent the interests of persons carrying on business in the borough.

**Specific consultation bodies**

- The Coal Authority
- The Environment Agency
- Historic England
- The Marine Management Organisation
- Natural England
- Network Rail
- Highways England
- East Sussex County Council, Parish Councils, and neighbouring Local Planning Authorities, as well as Police and Crime Commissioner
- Relevant telecommunications companies
- Relevant electric and gas companies
- Clinical Commissioning Groups
- Relevant sewerage undertakers (e.g. Southern Water)
- Relevant water undertakers (e.g. Southeast Water)
- Homes England and Regulator of Social Housing (previously Homes and Communities Agency)

### 3. Summary of consultation feedback

- 3.1. This section of the Interim Consultation Statement provides a summary of the feedback received to the Regulation 18 consultation on the Draft Rother Local Plan (2024). It highlights the main issues raised by respondents. It also explains how this consultation feedback has been considered, or will be considered in the future, by the Council during the preparation of the plan.
- 3.2. It should be noted that the following section does not indicate where respondents have provided their support for the Draft Local Plan proposals. Rather, the intention here is to signpost and distil the main issues raised by respondents during the Regulation 18 consultation. As noted earlier, a full schedule summarising all representations made on the Draft Local Plan (2024) will be included in a Consultation Statement, to be published at the Regulation 19 stage of the plan process.
- 3.3. All responses to the Regulation 18 consultation (2024) are available to view at the [Online Consultation](#) webpage, which can be accessed using the link provided or from the Council's new [Local Plan webpage](#).

#### Who responded to the consultation

- 3.4. A wide range of individuals and groups responded to the Regulation 18 consultation. This included government bodies, local authorities, Parish councils, infrastructure and service providers, community and special interest groups, landowners, developers and planning agents, businesses, and residents. Further details on specific and general consultation bodies submitting representations are set out in Table 3.1 below.

**There were 617 respondents to the consultation whose representations amounted to more than 3,700 unique comments on the Draft Local Plan and Evidence Base documents.**



- 3.5. For the Draft Local Plan itself, there were 538 respondents making up 3,468 unique comments.
- 3.6. For the Evidence Base documents (Sustainability Appraisal, Habitats Regulations Assessment and draft Housing and Economic Land Availability Assessment), there were 165 respondents and 240 unique comments.

**Table 3.1: Consultation Respondents by Main Category**

<b>Specific consultation bodies</b>
<p><b>Key statutory bodies</b></p> <p>Environment Agency, Historic England, Homes England, Marine Management Organisation, National Grid Electricity Transmission, National Highways, Natural England, Network Rail, NHS Property Services, NHS Sussex, Sport England, Southern Water,</p>
<p><b>Local and other authorities</b></p> <p>Ashford Borough Council, Eastbourne Borough Council, East Sussex County Council, Folkestone and Hythe District Council, Hastings Borough Council, Kent County Council, Tunbridge Wells Borough Council, Wealden District Council</p>
<p><b>Parish councils</b></p> <p>Battle Town Council, Beckley Parish Council, Brede Parish Council, Brightling Parish Council, Burwash Parish Council, Crowhurst Parish Council, Catsfield Parish Council, Dallington Parish Council, Etchingham Parish Council, Ewhurst Parish Council, Fairlight Parish Council, Guestling Parish Council, Hurst Green Parish Council, Icklesham Parish Council, Iden Parish Council, Mountfield Parish Council, Northiam Parish Council, Peasmarsh Parish Council, Pett Parish Council, Playden Parish Council, Salehurst and Robertsbridge Parish Council, Sedlescombe Parish Council, Ticehurst Parish Council, Wadhurst Parish Council, Westfield Parish Council</p>
<b>General consultation bodies (organisations and groups)</b>
<p>Asten Fields Residents Association, Bexhill Heritage, Bexhill Museum, Bexhill Old Town Preservation Society, Bexhill Rail Action Group, British Horse Society, Burwash Common and Weald Residents Association, East Field Fairlight Action Group, Fairlight Preservation Trust, Friends of Combe Valley, High Weald AONB (National Landscape) Unit, Home Builders Federation, Home Office, Marsham Brook Residents' Association, MarshLink Action Group, Martins Oak Surgery, New Road Artists Association, Northern Parishes Group, Ramblers, Rother Environmental Group, Rye Conservation Society, Rye Neighbourhood Plan Steering Group, Southern Housing, Sussex Ornithological Society, Sussex Wildlife Trust, Sustrans, The National Trust, The Theatres Trust, Transport Futures East Sussex, Wild About Burwash, Woodland Trust</p>

## Reading this section

- 3.7. The following section of the Interim Consultation Statement provides a summary of feedback received to the Regulation 18 consultation on the Draft Rother Local Plan (2024). For ease of reference, the summary is organised by the main chapters set out in the Draft Rother Local Plan (2024).
- 3.8. This section does not provide details as to which individuals, groups or organisations made specific comments – this information will be provided at a later date, as part of the Consultation Statement published at the Regulation 19 stage. However, as noted above, all responses to the Regulation 18 consultation (2024) are available to view at the [Online Consultation webpage](#), which can be accessed using the link provided or from the Council's new [Local Plan webpage](#).

The following section provides a summary of feedback received to the public consultation on the Draft Rother Local Plan (2024). The main purpose is to highlight the main issues raised by respondents. Therefore, it does not indicate where respondents indicated their support for the proposals and draft policies.

- 3.9. **Main issues** - For each chapter of the Draft Local Plan (2024), and for the individual supporting Evidence Base Documents published for consultation, the section provides a short form summary of the main issues and other notable comments arising from the representations. It is important to note that the summaries will not necessarily capture all of the issues and comments made. Rather, the intention here is to draw out the main issues, in line with the statutory requirements, as identified by Council officers through a comprehensive review of the representations.
- 3.10. The summaries do not indicate where there was support for the policies or plan proposals, however it should be noted that there were many instances where such support was provided by respondents.
- 3.11. **Summary of next steps** – The section also provides a short form summary of next steps in the plan process. These are the key actions the Council has taken, or will take, to address the main issues and other comments raised by the representations to the Draft Local Plan (2024).

3.12. Again, this is a summary and does not necessarily capture all of the actions or work that the Council will undertake as work on the plan progresses, such as additional statutory public consultation, engagement via the Duty to Cooperate, and ongoing work on the Sustainability Appraisal and Habitats Regulations Assessment.

3.13. To aid with reading the section, the following symbols are used throughout:

- ✓ Denotes where the key actions have now been undertaken.
- Denotes where the key actions will be undertaken in the future.

**Useful to know**

3.14. It is important to note that at this time, the Council has not provided a formal response to the individual representations. For example, whether it agrees or disagrees with a representation, or an explanation as to why it considers that a draft policy may be appropriate and justified or will be amended in response to the feedback received. This information will be included in the Consultation Statement published at the Regulation 19 stage of the plan process.

3.15. The Consultation Statement published at the Regulation 19 stage will also set out how the main issues raised through consultation have been addressed in the final draft Local Plan. The second Regulation 18 stage public consultation on the Draft Local Plan (2026) is focussed on the Development Strategy, site allocations and area-based policies. It does not cover or revisit the full complement of policies and topic areas presented in the first Regulation 18 stage consultation on the Draft Local Plan (2024). Therefore, the Regulation 19 stage provides a timely opportunity to bring all feedback received on the Regulation 18 documents together, with reference to the final 'proposed submission version' of the Local Plan which will be published at that time.

## **Feedback on Chapter 1: Introduction**

3.16. The following is a summary of **main issues and comments** raised on Chapter 1:

- Objections to the adequacy of consultation process.
- Comments on the consultation materials, including presentation and formatting of the Draft Local Plan.
- Comments on the absence of site allocation policies and clarity sought on the role of the Housing and Economic Land Availability Assessment.
- Whether the plan period of 2020-2040 is appropriate.
- Concerns that the Local Plan will have an adverse impact on the local area character including the High Weald National Landscape, open spaces, ancient woodland, and historic environment.
- Concerns that the Local Plan does not adequately address or contradicts objectives around sustainable development and the climate emergency.

3.17. The following is a summary of **next steps** - the key actions the Council has taken, or will take, to address the main issues raised:

- ✓ Amended the plan period to ensure the strategic policies cover a period of 15-years from the point of adoption, in accordance with national planning policy.
- ✓ Updated the Local Development Scheme to make provision for an additional round of Regulation 18 public consultation to be undertaken, focussing on the Development Strategy and proposed site allocation policies.
- Seek opportunities to make the plan more legible and user-friendly through editorial changes and desktop publishing.

## **Feedback on Chapter 2: Vision, Overall Priorities and Objectives**

3.18. The following is a summary of **main issues and comments** raised on Chapter 2:

- A wide range of suggestions for amending or adding to the vision, priorities and key spatial objectives set out in the Draft Local Plan.

- Whether the significant increase in housing and other types of development will be contrary to the Local Plan vision, priorities and objectives.
- Greater focus should be given to protecting and enhancing the natural environment, the National Landscape and heritage assets.
- Local economic sectors (such as tourism and creative industries) should be recognised and supported.
- More emphasis should be placed on making the optimal use of land, including through integrating land use and transport.
- Concerns about infrastructure needed to support levels of growth planned.
- The plan does not adequately address rural areas and communities.
- Clarification sought on the 'sustainable locations' for development, which are signposted in the introductory chapter but do not appear to have been defined.

3.19. The following is a summary of **next steps** - the key actions the Council has taken, or will take, to address the main issues raised:

- ✓ Reviewed and updated the strategic spatial objectives.
- ✓ Reviewed and updated the Development Strategy and sub-area visions, with consideration given additional options for the Development Strategy.
- ✓ Reviewed and updated the Infrastructure Delivery Plan (and will engage with infrastructure providers on this).
- Review and where appropriate update the vision and overall priorities.
- Update the Local Plan 'Policies Map'.

### **Feedback on Chapter 3: Green to the Core**

3.20. The following is a summary of **main issues and comments** raised on Chapter 3:

- Developers object to the proposed policies and standards that go beyond those in the Building Regulations, also noting that this approach is contrary to the Written Ministerial Statement<sup>8</sup> on this matter.
- Developers state that the proposed policies will harm development viability and are too onerous for smaller developments and housebuilders.
- Clarity sought on the implementation of the policies, including on the thresholds for the size of development that will trigger certain policy requirements.
- Whether the policies will apply equally to heritage assets.
- Views that allowing development on greenfield land and the High Weald National Landscape will compromise the principle of Green to the Core.
- Whether the plan should make allowances for Biodiversity Net Gain to be delivered off-site.

3.21. The following is a summary of **next steps** - the key actions the Council has taken, or will take, to address the main issues raised:

- ✓ Continued to be part of the working group for the East Sussex Local Nature Recovery Strategy (LNRS) and responded to the formal consultation on the LNRS (and will seek opportunities to link it with the Local Plan).
- Keep under review the national planning policy and legislation to inform plan production, including the emerging UK Net Zero Carbon Building Standard and revised NPPF (2025)<sup>9</sup>.
- Prepare a whole plan Viability Assessment to ensure the policy requirements and standards can be viably delivered.
- Review and where appropriate update the Green to the Core policies, including to aid policy implementation (e.g., to make clear the thresholds for

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<sup>8</sup> Statement UIN HCWS123. Planning – Local Energy Efficiency Standards Update. Statement made on 13 December 2023.

<sup>9</sup> Proposed Reforms to the National Planning Policy Framework and other changes to the planning system. December 2025. Ministry of Housing, Communities and Local Government.

which policy requirements will apply to new development, and how applications concerning heritage assets will be considered).

### **Feedback on Chapter 4: Live Well Locally**

3.22. The following is a summary of **main issues and comments** raised on Chapter 4:

- Whether the policies sufficiently respond to the Rother's local distinctiveness and provide a good basis for placemaking.
- Concerns that the Live Well Locally approach and policies will be difficult to implement in rural areas due to a lack of infrastructure, services and facilities (including poor or limited public transport options).
- A wide range of comments regarding the proposed design policies, particularly around density and building heights.
- Clarity sought on the implementation of the policies, including on the thresholds for the size of development (e.g. definition of major development) that will trigger certain policy requirements.
- Clarity sought on the plan's approach to and feasibility of 'Demand Responsive Transport', along with concerns about the transport and parking policies promoting modal shift when many localities are car reliant.

3.23. The following is a summary of **next steps** - the key actions the Council has taken, or will take, to address the main issues raised:

- ✓ Reviewed and updated the Infrastructure Delivery Plan (and will engage with infrastructure providers on this)
- ✓ Updated the Density Study to inform the setting of appropriate density standards in the district.
- Carry out transport modelling of the Development Strategy to assess impacts and inform infrastructure requirements, both district wide and on a site basis.

- Ensure the Local Plan aligns with national planning policy and legislation for transport matters, including the Department for Transport Circular 01/2022, 'Strategic road network and delivery of sustainable transport'
- Review and where appropriate update the Live Well Locally policies, including to aid policy implementation (e.g., to define major development).
- Review opportunities to cross-reference and reflect key strategies and guidance documents in the Local Plan – for example, the High Weald Management Plan and East Sussex Local Cycling and Walking Infrastructure Plan.

### **Feedback on Chapter 5: Development Strategy and Principles**

3.24. The following is a summary of **main issues and comments** raised on Chapter 5:

- Whether the Development Strategy is appropriate and deliverable. This reflects a wide range of comments on the Development Strategy options, including support and objections to selected options together with concerns that the preferred approach, combining multiple options, will not provide for a cohesive strategy.
- Concerns about the levels of growth being planned for with suggestions that this will lead to overdevelopment, particularly in rural areas and the countryside.
- Site promoters, developers and agents indicate that the Council must seek to meet identified needs for housing in full.
- Concerns about the coalescence of settlements and the loss or compromising of strategic gaps.
- Concerns about growth being planned in areas at risk of flooding or where water/wastewater infrastructure is insufficient.
- Concerns that growth and new development will not be adequately supported by infrastructure, particularly in rural areas. This includes concerns about the lack of public transport and that new development may



create or add to existing issues of traffic and congestion on the highway network.

- Concerns about the adverse impact of growth and new development on local character, the National Landscape, protected habitats and agricultural land, and whether allowing for development on greenfield land is appropriate.
- A wide range of comments on visions for spatial areas of the district along with potential development sites within them, as identified in the Draft Housing and Economic Land Availability Assessment. This includes objections to and issues raised with specific sites. Conversely, landowners and agents indicate support for sites as well as seeking clarifications on the outcomes of the HELAA (e.g. why some sites have been discounted or considered unsuitable).
- Clarifications sought on proposed policy DEV3 concerning development boundaries. Concerns that the policy is vague or lacks clarity (does not sufficiently define 'appropriate development' outside of the boundaries) and will ultimately lead to harmful development in the countryside. Site promoters, developers and agents suggesting the policy may preclude appropriate development from coming forward.
- Whether the proposed policy DEV5 concerning strategic gaps is appropriate and justified. This includes support for the approach together with suggestions for additional gaps to be set out in the Local Plan, and conversely, concerns that these may preclude new development coming forward to meet identified needs.
- Clarifications sought on the role of Neighbourhood Plans, together with suggestions that the Draft Local Plan should be informed by Neighbourhood Plans.
- Objections to the use of a stepped trajectory to manage the delivery of housing over the plan period.

3.25. The following is a summary of **next steps** - the key actions the Council has taken, or will take, to address the main issues raised:

- ✓ Updated the Local Development Scheme to make provision for an additional round of Regulation 18 public consultation to be undertaken, focussing on the Development Strategy and site allocation policies.
- ✓ Re-publicised the 'Call for Sites' and invited the public to submit sites to be considered for inclusion in the Local Plan.
- ✓ Carried out a Housing and Economic Land Availability Assessment (HELAA) update to identify land that is suitable, available and achievable for development within the plan period.
- ✓ Reviewed and updated the Development Strategy and sub-area visions, with consideration given to additional options for the Development Strategy and made/emerging Neighbourhood Plans.
- ✓ Updated and prepared new 'area-specific' strategic policies, as set out in the Draft Local Plan.
- ✓ Prepared site allocation policies which together include provision of land to seek to meet identified development needs.
- ✓ Reviewed and updated the Infrastructure Delivery Plan (and will engage with infrastructure providers on this).
- Review and update the Housing and Economic Development Needs Assessment (HEDNA) to ensure the plan continues to be informed by up-to-date evidence of local economic needs.
- Set indicative housing targets for Neighbourhood Plans.
- Prepare a housing trajectory informed by the HELAA update.
- Review development boundaries and prepared updated proposals for these across the district.
- Update the Local Plan 'Policies Map'.

## **Feedback on Chapter 6: Health and Wellbeing**

3.26. The following is a summary of **main issues and comments** raised on Chapter 6:

- Whether the proposed thresholds for Health Impact Assessments are appropriate, and the level of detail that should be included within them.
- Whether there is sufficient flexibility for infrastructure providers to reconfigure, dispose of or relocate assets (such as health care facilities) where this would support wider public investment programmes.
- Concerns that growth and new development will not be adequately supported by infrastructure, particularly in rural areas, together with suggestions about specific types of community facilities needed in the district.
- The protection of green and open spaces, and access to them, is vital to health and wellbeing.

3.27. The following list is a summary of **next steps** - the key actions the Council has taken, or will take, to address the main issues raised:

- ✓ Reviewed and updated the Infrastructure Delivery Plan (and will engage with infrastructure providers on this)
- Prepare additional technical evidence to inform policies on and associated with health and wellbeing – for example, a ‘Stage E’ review of the Playing Pitch Strategy.
- Review and where appropriate update the Health and Wellbeing policies, including to aid policy implementation (e.g. for Health Impact Assessments, to ensure appropriate protections for community facilities and blue green infrastructure).

## **Feedback on Chapter 7: Infrastructure**

3.28. The following is a summary of **main issues and comments** raised on Chapter 7:

- Whether existing infrastructure in the district is adequate (including for health and social care, education, transport, water and wastewater) and

concerns that growth and new development will not be sufficiently supported by infrastructure, particularly in rural areas.

- Clarity sought on how funding for new or improved infrastructure will be secured, and how the Local Plan can ensure the timely delivery of infrastructure.
- Development industry stakeholders state that infrastructure should be dealt with through the Local Plan process and not be left to developments to address on a case-by-case basis.
- Development industry stakeholders note that development viability is important to consider for any site allocation policies that require new or improved infrastructure.
- Some Parish Councils suggest that they should be engaged in infrastructure planning.
- Whether a policy on digital connectivity is necessary as requirements are set out in Building Regulations.

3.29. The following list is a summary of **next steps** - the key actions the Council has taken, or will take, to address the main issues raised:

- ✓ Reviewed and updated the Infrastructure Delivery Plan (and will engage with infrastructure providers on this).
- ✓ Considered infrastructure requirements for specific development sites through the preparation of draft site allocation policies.
- Prepare a whole plan Viability Assessment to ensure the policy requirements can be viably delivered.
- Carry out transport modelling of the Development Strategy to assess impacts and inform infrastructure requirements.
- Keep under review Building Regulations to ensure Local Plan policies on digital connectivity align with these.

- Review and where appropriate update the Infrastructure policies, including to aid policy implementation (e.g. to provide clarity on funding mechanisms for new infrastructure and priorities for spending).

### **Feedback on Chapter 8: Housing**

3.30. The following is a summary of **main issues and comments** raised on Chapter 8:

- A range of comments on the requirements for affordable housing, recognising that the Draft Local Plan did not specify an affordable housing target (as a percentage). This included suggestions for the target, comments that the target must be informed by a viability assessment, and concerns about the effectiveness of such a policy when some developments are not achieving targets under the adopted plan.
- Whether the Community Infrastructure Levy (CIL) rate will adversely impact on or undermine the viability of affordable housing.
- Concerns about proposals for 100% affordable housing developments. Comments noting that these schemes would be Community Infrastructure Levy exempt and therefore place limits on infrastructure funding and investment where they are located, particularly in rural areas. Others suggested this could undermine inclusive communities by leading to an overconcentration of this tenure type, and that ‘pepper-potting’ of affordable housing would be preferable.
- Whether the housing policies adequately address the specific needs of parishes and rural settlements as well as different groups, such as young people (especially with families) and older people.
- Whether the policies for rural exception sites and new dwellings in the countryside are appropriate, with concerns that this will lead to inappropriate or excessive development in the countryside as well as harm to the National Landscape.
- Separate policies should be created for housing alterations/conversions and Houses in Multiple Occupation (HMOs) respectively, to avoid confusion.

- Whether the proposals for gypsy, traveller and travelling showpeople accommodation are appropriate. This includes queries about the extent to which the plan can meet identified needs, views on suitable locations for this provision, and concerns about the impact of this type of development on amenity and local character.

3.31. The following is a summary of **next steps** - the key actions the Council has taken, or will take, to address the main issues raised:

- ✓ Re-publicised the 'Call for Sites' and invited the public to submit sites to be considered for inclusion in the Local Plan.
- ✓ Carried out a Housing and Economic Land Availability Assessment (HELAA) update to identify land that is suitable, available and achievable for development within the plan period. This included land for the gypsy, traveller and travelling showpeople community.
- ✓ Prepared draft site allocation policies which together include provision of land for housing uses to meet identified needs.
- Review and update the Housing and Economic Development Needs Assessment (HEDNA) to ensure the plan continues to be informed by up-to-date evidence of housing needs, including for affordable housing.
- Prepare a whole plan Viability Assessment to inform the affordable housing policies, and to ensure the policy requirements and site allocation provisions for housing uses can be viably delivered.
- Update the Community Infrastructure Levy Charging Schedule, in accordance with the adopted Local Development Scheme.
- Continue to work with authorities in East Sussex to update the joint Gypsy and Traveller Accommodation Assessment and cooperate with them to seek to meet identified needs for this group.
- Review and where appropriate update the Housing policies, including to aid policy implementation (e.g., for affordable housing requirements, and clarify how applications for HMOs and rural exception sites will be treated).

## Feedback on Chapter 9: Economy

3.32. The following is a summary of **main issues and comments** raised on Chapter 9:

- Whether the Local Plan strategy for economic development and job growth is sufficiently clear, including the identification of key business sectors and their development needs.
- More emphasis should be given to the creative and cultural industries.
- Whether greater allowance should be made for mixed-use developments to ensure the viability of employment sites.
- Whether the policies for rural areas strike the right balance in enabling economic development whilst protecting local character, including landscape character. And related to this, comments that some policy wording is vague or arbitrary - clarity sought on what constitutes 'small scale' development or exceptional circumstances for permitting new development in rural areas.
- Concerns about the impact of employment development on landscape character, including the High Weald National Landscape, particularly development for tourism (e.g. visitor accommodation), agricultural and equine uses.
- Whether the policies adequately address potential impacts of agricultural and forestry development, such as impacts on local amenity and Public Rights of Way.

3.33. The following is a summary of **next steps** - the key actions the Council has taken, or will take, to address the main issues raised:

- ✓ Re-publicised the 'Call for Sites' and invited the public to submit sites to be considered for inclusion in the Local Plan.
- ✓ Carried out a Housing and Economic Land Availability Assessment (HELAA) update to identify land that is suitable, available and achievable for development within the plan period.
- ✓ Prepared site allocation policies which together include provision of land for economic uses to meet identified needs.

- ✓ Prepared a Tourism and Visitor Accommodation Study, working with Hastings Borough Council.
- Review and update the Housing and Economic Development Needs Assessment (HEDNA) to ensure the plan continues to be informed by up-to-date evidence of local economic needs.
- Keep under review Government proposals for changes to the Use Classes Order (i.e., a new Use Class C5 concerning holiday lets) and the draft new NPPF (2025).
- Prepare a whole plan Viability Assessment to ensure the policy requirements and site allocation provisions for economic development uses can be viably delivered.
- Review and where appropriate update the Economy policies, including to aid policy implementation (e.g., to make clear the thresholds for which policy requirements will apply to new development, and how applications for employment uses in rural areas will be considered).

### **Feedback on Chapter 10: Landscape Character**

3.34. The following is a summary of **main issues and comments** raised on Chapter 10:

- Whether the Local Plan adequately explains the distinctive characteristics of landscapes in the district, and if the policies provide sufficient protection for them.
- Concerns about the impact of new development on landscape and historic character, natural environment and biodiversity - with comments on specific sites in the Housing and Economic Land Availability Assessment.
- Clarification sought on what constitutes an 'acceptable loss' of trees, woodlands and hedgerows.
- Whether the use of the Capital Value Asset for Amenity Trees (CAVAT) tool will provide a justification for avoidable tree loss.



- Concerns about the impact of development on dark skies, and whether the plan should refer to areas where dark sky accreditation is being sought.

3.35. The following is a summary of **next steps** - the key actions the Council has taken, or will take, to address the main issues raised:

- ✓ Considered impacts on landscape as part of the site-assessments to inform the Housing and Economic Land Availability Assessment update, and the preparation of proposed site allocation policies.
- Continue to use landscape assessment evidence to support the development of the final site allocations to be prepared for the Regulation 19 stage.
- Review opportunities to cross-reference and reflect key strategies and guidance documents in the Local Plan, such as the High Weald AONB (National Landscape) Management Plan.
- Review and where appropriate update the Landscape Character policies, including to aid policy implementation (e.g. ensuring the district's distinctive landscape character is adequately explained and fully considered in the design and development process).

### **Feedback on Chapter 11: Environmental Management**

3.36. The following is a summary of **main issues and comments** raised on Chapter 11:

- Comments on the adequacy of existing infrastructure in the district (particularly health and social care, education, transport, water and wastewater) and that new or improved infrastructure is needed to support growth, particularly for water, wastewater and flood risk management.
- Concerns around existing issues of local flood events, water scarcity, pollution and water quality.
- Comments from statutory bodies (including Environment Agency and Natural England) and service providers (e.g. Southern Water) including suggestions for amending the policies and supporting text.

- Clarifications sought on the spatial extent of the Fairlight Cove Coastal Change Management Area together with queries as to whether the policy is sufficient to manage risk of coastal change locally.

3.37. The following is a summary of **next steps** - the key actions the Council has taken, or will take, to address the main issues raised:

- ✓ Reviewed and updated the Infrastructure Delivery Plan (and will engage with infrastructure providers on this)
- Update the Level 1 Strategic Flood Risk Assessment (SFRA) and prepare a SFRA Level 2 to consider proposed site allocations.
- Prepare a Flood Risk Sequential Test and Exception Test, where necessary, for proposed site allocations.
- Review opportunities to cross-reference and reflect key strategies and guidance documents in the Local Plan – for example, the South Inshore and Offshore Marine Plan
- Review and where appropriate amend the Environmental Management policies to ensure they align with national planning policy and relevant strategies, such as the South Inshore and Offshore Marine Plan.
- Review and where appropriate update the Environmental Management policies, including to aid policy implementation (e.g. to provide clarity on site specific requirements for flood risk and water management).

### **Feedback on Chapter 12: Heritage**

3.38. The following is a summary of **main issues and comments** raised on Chapter 12:

- Whether the Local Plan sufficiently highlights the contribution the historic environment makes to the district.
- Requests that specific heritage assets should be referred to or more specifically addressed in the Local Plan.

- Suggestions for strengthening the policies to refer to the significance of heritage assets and their setting.
- Clarification sought on how the heritage policies will interact with those in the Green to the Core chapter, particularly around sustainable design and retrofitting.
- Whether policies regarding traditional historic farm buildings strike the right balance in terms conservation and enabling their active use.

3.39. The following is a summary of **next steps** - the key actions the Council has taken, or will take, to address the main issues raised:

- ✓ Considered impacts on heritage assets as part of the site-assessments to inform the Housing and Economic Land Availability Assessment update, and the preparation of proposed site allocation policies.
- Review opportunities to cross-reference and reflect key strategies and guidance documents in the Local Plan, such as the National Design Guide and Historic England's 'Energy Efficiency and Retrofit in Historic Buildings'.
- Review and where appropriate update the Heritage policies, including to aid policy implementation (e.g. ensuring heritage is fully considered in the design and development process, having regard to the significance of heritage assets and their setting).

### **Feedback on the Appendices**

3.40. The following is a summary of the **main issues and comments** raised on the Draft Local Plan Appendices:

- Clarifications sought on the designation of town centre boundaries and primary shopping areas, together with suggestions for amending these.
- Clarifications sought on the ongoing monitoring of the Draft Local Plan, together with suggestions for improving the effectiveness of the monitoring framework.

3.41. The following list is a summary of next steps - the key actions the Council has taken, or will take, to address the main issues raised:

- Review and where appropriate update the Appendices, including the monitoring framework, considering feedback received.

### **Feedback on Sustainability Appraisal and Habitats Regulations Assessment**

3.42. The following is a summary of **main issues and comments** raised on the Sustainability Appraisal and Habitats Regulations Assessment reports:

- Suggestions for key plans and strategies to be included in the SA framework.
- Comments questioning and/or challenging the scoring of spatial strategy options, also signposting that these have not been quantified for assessment.
- Comments challenging findings of the HRA reports and suggestions that adverse impacts on protected habitats cannot be ruled out.

3.43. The following is a summary of **next steps** - the key actions the Council has taken, or will take, to address the main issues raised:

- ✓ Prepared an additional Interim Sustainability Appraisal report, in support of the second Regulation 18 consultation on the draft Local Plan. This included a review and update of the SA Framework, and further assessment of spatial strategy options.
- Continue to undertake SA and HRA during the preparation of the Local Plan.

### **Feedback on the Housing and Economic Land Availability Assessment**

3.44. The following is a summary of **main issues and comments** raised on the Draft Housing and Economic Land Availability Assessment.

- A wide range of comments on the findings of the HELAA, both on sites signposted in the Draft Local Plan as potential development sites and those excluded as omission sites.
- Objections to the inclusion of specific HELAA sites in the Draft Local Plan as potential development sites for various reasons. This includes incompatibility with sustainable development and the Development Strategy

or key priorities, adverse impacts to local character, harm to the countryside and the High Weald National Landscape, harm to biodiversity and nature conservation, flood risk, adverse impacts on the highway network, and lack of suitable infrastructure to support development.

- Landowners, agents and developers indicating support for HELAA sites included the Draft Local Plan as potential development sites, comments that omission sites should be included, and suggestions of additional sites for consideration.

3.45. The following is a summary of **next steps** - the key actions the Council has taken, or will take, to address the main issues raised:

- ✓ Updated the Local Development Scheme to make provision for an additional round of Regulation 18 public consultation to be undertaken, focussing on the Development Strategy and site allocation policies.
- ✓ Re-publicised the 'Call for Sites' and invited the public to submit sites to be considered for inclusion in the Local Plan.
- ✓ Carried out a Housing and Economic Land Availability Assessment (HELAA) update to identify land that is suitable, available and achievable for development within the plan period.
- ✓ Prepared draft site allocation policies which together include provision of land for economic uses to meet identified needs.
- Keep the 'Call for Sites' exercise open to continue to provide opportunities for the public to submit sites for consideration.

## 4. Consultation material

4.1. The following section provides copies and samples of the consultation materials used to support the Regulation 18 consultation on the Draft Rother Local Plan (2024) and associated Evidence Base documents. This includes:

- Public notices
- Letter notification sent to consultees
- Email notification sent to consultees
- Council website information
- Rother My Alerts notifications
- Social Media notifications
- Public exhibition posters
- Public exhibition boards
- Consultation Form