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Rother Local Plan 2025-2042

Part 1 – Strategic and Development Management Policies

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Rother District Council

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Chapter 1: Introduction – Planning for Rother's Future

About the Rother Local Plan

Background

1.1 The Rother Local Plan sets out a vision for the future of the district along with the planning, land-use and delivery framework to achieve this vision through to 2042. It has been prepared to ensure there is a clear framework in place to deliver sustainable development locally, in a way that enhances the wellbeing of our communities and respects the distinctive character and special qualities of the district.

1.2 Rother is a special, but highly environmentally constrained district, with some 83% of its land area lying within the High Weald National Landscape and a further 7% containing nationally and internationally protected habitat sites. National Landscapes have the highest status of protection in relation to landscape and scenic beauty. Rother, like all relevant Authorities, has a legal duty to seek to further the statutory purpose of National Landscapes, which is "to conserve and enhance the natural beauty of the area". This duty has a significant impact on the type and amount of development that can be appropriately accommodated within the district, as reflected in the Local Plan.

1.3 The Local Plan is underpinned by and will help to support Rother's Council Plan[1]. This sets out the overarching priorities of the Council along with key actions to deliver on these. It includes the vision and three key themes of:

- **'A Thriving Local Economy'** for the district with diverse, flexible, well-paid local employment and skills opportunities;
- For people to be enabled to **'Live Well Locally'** within safer and fairer communities; and
- Rother to be recognised as being **'Green to the Core'** in leading the response to the climate and biodiversity emergencies as well as protecting the historic and natural environment.

[1] Our Council Plan 2025-2029, Rother District Council.

1.4 The Local Plan is the main document used by the Council to determine planning applications. Once adopted, the new Local Plan will replace the Rother Core Strategy (2014) and Development and Site Allocations Local Plan (2019). The Affordable Housing Supplementary Planning Document (2006) will also be deleted.

1.5 The Government has committed to a process of local government reorganisation. This will lead to significant changes, including the creation of a unitary council that will replace Rother District Council. Whilst many details are still to be confirmed, this will affect how local councils operate and services are delivered in East Sussex and elsewhere in the country. Amidst this backdrop of change, the Local Plan will help to ensure that the best interests of Rother's people, places and environment continue to remain at the heart of local planning decisions.

The planning framework

1.6 Rother's Local Plan is prepared within the context of a planning framework set by the Government which provides for a 'plan-led' system in England. At its core, this involves identifying what type of development is needed and where, as well as which areas need to be protected or enhanced. Local plans form the main basis for planning decisions to ensure that new development (including supporting infrastructure) is coordinated, appropriately located and well-designed. In short, the plan-led system provides certainty about the expected outcomes of the planning and development process and helps to avoid ad-hoc or discretionary decision-making.

1.7 The Planning and Compulsory Purchase Act 2004 is primary legislation that provides the main basis for the plan-led system. It is supported by secondary legislation, including the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), which provide further details on the process for the Council to prepare and adopt the Local Plan and other supporting documents.

1.8 The Local Plan is required to be consistent with national policy, including the National Planning Policy Framework (NPPF). The NPPF sets out the Government's planning policies for England and how they should be applied, with the main objective of delivering sustainable development. It includes directions for the preparation of local plans and is also a material consideration in planning decisions. The NPPF is supported by the companion Planning Practice Guidance (PPG).

A new planning system

1.9 The Levelling Up and Regeneration Act 2023 (LURA) paves the way for a new planning system in England (whist retaining the principles of the plan-led system). It revises the parameters for plan-making to speed up the overall process and to help ensure local authorities have up-to-date plans. The Planning and Infrastructure Act 2025 follows on from the LURA. Its main aims are to streamline the planning system and to facilitate joint working across administrative boundaries to address development and infrastructure needs. This includes the production of new sub-regional Spatial Development Strategies, which set the framework for and guide the preparation of Local Plans.

1.10 The Town and Country Planning (Local Planning) (England) Regulations 2026 establish the updated legal framework for local planning in England. They replace the 2012 Regulations and give effect to new planning system. In addition, the Government published a new NPPF in August 2026.

1.11 The Government has set a deadline for local planning authorities to submit their Local Plans to the Secretary of State for examination by December 2026, in order for these to be assessed under the provisions of the 'legacy' planning system[2]; after which Local Plans must be prepared and examined in accordance with the new planning system. For the avoidance of doubt, this Local Plan has been produced under the legacy system.

1.12 Where the NPPF is cited in this Local Plan, this refers to the NPPF published in December 2024 unless otherwise specified.

The plan period

1.13 The NPPF requires the Local Plan to include strategic policies that look ahead over a period of at least 15-years from the plan's adoption.[3] The plan period has been set considering the plan's timetable for production[4] and expected date of adoption, subject to it being found sound and legally compliant at Examination in Public. The plan period for the Rother Local Plan is the 17-year period from 1st April 2025 to 31st March 2042.

[2] Principally as set by the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).
[3] NPPF (2024). Paragraph 22.
[4] Local Development Scheme, Rother District Council.

How to use the Local Plan

1.14 The Local Plan forms part of Rother's statutory Development Plan, together with the Minerals and Waste Plans prepared by East Sussex County Council and 'made' Neighbourhood Plans. It is law that planning applications must be determined in accordance with the Development Plan, unless material considerations indicate otherwise.[5]

Structure

1.15 For ease of use, the Local Plan is organised into chapters covering a range of planning policy topics and matters. The structure of the Local Plan and the main contents of each chapter is set out in Figure 1.1 below. The order of the strategic priorities, topics and policies in the plan is not a reflection of their weight or importance. Planning policies are clearly indicated throughout by text boxes along with policy names and reference numbers.

1.16 A separate Policies Map has been prepared and sits alongside the Local Plan. It illustrates the development policies that apply to different geographical areas in the district. The Policies Map has been prepared as a digital map and is available to view online at the Council's Local Plan webpage.

Figure 1.1: Rother Local Plan structure

Chapter 1	**Introduction** Provides background information on the Local Plan and a profile of Rother.
Chapter 2	**Vision, priorities, objectives and the spatial strategy** Sets out the future vision for Rother district, the key priorities and objectives for the Local Plan, and the spatial strategy (the land-use and development framework).
Chapters 3 to 7	**Thematic topic area policies** Planning policies to ensure that new development is appropriately located, designed and managed. These cover a range of thematic topic areas organised on the following headings: • Delivering new homes • A thriving local economy • Green to the Core • Live Well Locally • Natural and historic environment

[5] As set out by Section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004.

Chapter 8	**Monitoring framework**
Chapter 9	**Area and site allocation policies** Planning policies for specific areas and sites, which are organised by five geographic sub-areas of the district. Site allocations set site-specific requirements for the use of land and design of development.
	Appendices

1.17 Whilst the chapters and planning policies individually cover specific planning matters, for planning applications and decisions the Local Plan must be read as a whole, considering all relevant policies.

Strategic and non-strategic policies

1.18 The NPPF requires the Local Plan to include strategic policies that set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for identified development needs. As noted above, strategic policies should cover a minimum period of 15-years from the plan's adoption. Further, the NPPF directs that Local Plans clearly distinguish between strategic and non-strategic policies. Therefore, each policy in this Local Plan denotes which type it is. For reference, a schedule of strategic policies is also included in Appendix 1.

Neighbourhood planning

1.19 Neighbourhood planning provides opportunities for local communities to prepare Neighbourhood Development Plans, or Neighbourhood Plans, which set out a shared vision for their local area and policies to help facilitate sustainable development. There are currently 9 such plans in the district that have been 'made' (adopted), as listed below:

- Battle CP Neighbourhood Plan
- Burwash Neighbourhood Plan
- Crowhurst Neighbourhood Plan
- Hurst Green Neighbourhood Plan
- Peasmarsh Neighbourhood Plan
- Rye Neighbourhood Plan

- Salehurst & Robertsbridge Neighbourhood Plan
- Sedlescombe Neighbourhood Plan
- Ticehurst Neighbourhood Plan

1.20 Rother District Council will continue to work positively with parish and town councils in the district during the preparation and review of their Neighbourhood Plans. Each of the Neighbourhood Plans currently has an "end date" of 2028 and, with the exception of Rye, has not commenced a Review to extend the plan period. Therefore, this Local Plan identifies sites to meet the housing requirement in each of the neighbourhood planning areas, with the exception of Rye (as set out at Policy SS6: Neighbourhood Plans & Parish Priority Statements). This does not, of course, preclude the identification of additional site allocations through the neighbourhood plan process.

1.21 An alternative option for parish and town councils is to prepare a "Parish Priority Statement", as further detailed at paragraph 2.88. There is currently[6] one Parish Priority Statement in Rother, for Catsfield.

Useful information

1.22 Where the term **'major development'** is used in the Local Plan this is defined in accordance with planning legislation[7] unless otherwise specified, i.e. for housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000 square metres or more, or a site of 1 hectare or more. In the High Weald National Landscape, the NPPF sets out provisions and considerations for what constitutes major development for the specific purposes of NPPF Paragraphs 190 and 191 only[8].

How the Local Plan has been prepared

1.23 The procedures and requirements for preparing a Local Plan are set out by planning legislation and the NPPF. There are several key stages involved in the plan-making

[6] As of September 2026
[7] Development Management Procedure (England) Order 2015 and the Town and Country Planning Act 1990 (as amended)
[8] NPPF (2024), paragraph 189-190.

process, including multiple rounds of formal (statutory) public consultation before a draft plan can be submitted to the Secretary of State for Examination in Public.

1.24 The Council has carried out extensive engagement and consultation with key stakeholders throughout the preparation of the Local Plan. This includes with Government bodies, neighbouring and other local authorities, infrastructure providers, special interest groups, businesses, landowners and developers, parish councils, local communities and community groups, local residents, and the wider public. Feedback received during this process has been used to inform the preparation of the plan. Further details of the consultation process and outcomes are set out in the Rother Local Plan: Consultation Statement.[9]

Evidence base

1.25 The Local Plan is informed by a robust and proportionate evidence base. This is made up of technical studies, assessments and other supporting documents. The evidence base includes documents that have been prepared by the Council (either directly or by commissioning specialist consultants) and other organisations, including Government bodies. The evidence base helps to ensure that the policies in the Local Plan are appropriate and justified, taking into account the latest available information.

Impact Assessments

1.26 There are several assessments that are legally required to be undertaken during the preparation of the Local Plan, as follows:

- Strategic Environmental Assessment (SEA) / Sustainability Appraisal (SA) – An assessment of the predicted environmental, social and economic effects of the Local Plan. It is carried out as an iterative process and used to inform the plan's production. A Health Impact Assessment (HIA) has been incorporated into the SA.[10]

[9] This is the Consultation Statement prepared in accordance with Regulation 22(1)(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended, as well as Interim Consultation Statements published during the plan's preparation.

[10] The Health Impact Assessment process has been informed by joint working with the East Sussex County Council Public Health Team.

- Habitats Regulations Assessment (HRA) – An assessment to determine whether the Local Plan will adversely impact on protected habitats and species.[11]

- Equalities Impact Assessment (EqIA) – An assessment to consider the impact on groups defined by the protected characteristics under the Equality Act 2010.

1.27 These assessments have been carried out in line with the statutory requirements and form part of the Local Plan evidence base.

Portrait of Rother

1.28 The following section provides an overview of the district and its population. It is intended to draw out some of the key features, characteristics and trends that are of particular interest to the preparation of the Local Plan. Further information about the district is set out elsewhere in the Local Plan as well as the supporting evidence base.

Location

1.29 Rother is located in East Sussex, in the South East of England along the south coast. The district covers roughly 200 square miles by area, with a coastline spanning some 25 miles. It is bordered by the authority areas of Wealden, Tunbridge Wells, Ashford, Folkestone & Hythe, and it surrounds Hastings.

[11] As designated under European Union Council Directive on the conservation of wild birds (79/409/ EEC) 1992, European Union Council Directive on the conservation of natural habitats and of wild fauna and flora (92/43/EEC) 1992 and Ramsar Convention on wetlands of international importance.

Figure 1.2: Rother district context



Geography and settlement pattern

1.30 Rother's geography is characterised by its coastal and predominantly rural setting, with a variety of environmental assets that provide both ecological and amenity value. The coastline features shingle beaches, nature reserves and low-lying marshes. Inland, there are rivers and river valleys together with expanses of agricultural land, fields, woodlands and rolling hills. Most of the district, some 83 per cent of its total area, is within the High Weald National Landscape, recognised as an Area of Outstanding Natural Beauty and one of the best remaining examples of a medieval landscape in Northern Europe. Some 7 per cent of the district features internationally or nationally protected habitats sites. These include the Pevensey Levels, straddling the district's south-western boundary, and the Dungeness Complex of Habitats Sites on the south-eastern boundary.

1.31 Rother has a characteristically rural settlement pattern. The principal urban area is Bexhill-on-Sea, with the historic market towns of Battle and Rye being secondary centres and also key focal points of community and commercial activity. There are villages dispersed throughout the district, often situated along historical transport routes.

1.32 The major trunk roads are the north-south A21 London to Hastings road, which cuts through the district, and the A259 coastal route running east-west. In terms of rail, Rother is served by mainline National Rail routes providing connections across East Sussex, Kent and onwards toward London, including High Speed 1 via Ashford. The

heritage "Rother Valley" railway provides a leisure route in the north-eastern part of the district.

Heritage

1.33 Rother has a rich historic environment shaped by its built heritage, landscape character and settlement pattern. The district contains a wide range of designated heritage assets including over 2,000 listed buildings together with Conservation Areas, scheduled monuments, registered parks and gardens, and the renowned historic battlefield at Battle. Its historic places include the market towns of Battle and Rye, the Victorian and Edwardian seaside town of Bexhill-on-Sea, the planned medieval town of Winchelsea, and numerous villages, hamlets and dispersed farmsteads across the High Weald. The form, materials and appearance of settlements and buildings reflect both regional and local characteristics. This heritage contributes to Rother's sense of place, cultural identity and local distinctiveness.

Population

1.34 In 2024, Rother's population was 96,133 people, comprising roughly 52 per cent females and 48 per cent males by gender. Rother has an older than average, and aging, population, with a median age of 53; the highest in the South East. People aged 65 and older make up one-third of the population. However, there are also many families and younger people, with those under the age of 16 accounting for 15 per cent of the population. In terms of ethnicity, 2021 Census data indicates that some 95 per cent of the population is white.[12]

1.35 The life expectancy of someone born in Rother is 86 years (for females) and 83 years (for males). These figures are slightly above national averages and have improved slightly over recent years. Dementia is the leading cause of death, followed by ischaemic heart diseases, although the most common causes of premature death (under 75 years), are lung cancer and heart disease[13]. Physical activity rates for adults in Rother are comparable to averages in the South East and the country, however for children aged 5 to 16 they compare less favourably, with activity rates amongst the lowest in the South East.[14]

[12] Local Indicators for Rother, E07000064, Office for National Statistics, 2024.
[13] Rother Joint Strategic Needs Assessment 2024.
[14] State of Rother 2025, Rother District Council.

Deprivation

1.36 Whilst the South East is generally more affluent than other parts of the country, this is not necessarily the case for Rother. The district is in the 40 per cent most deprived authority areas in England. The 2019 Index of Multiple Deprivation gives an overall rank for Rother of 135 out of 317 English authorities (with 1 ranked as the most deprived). Rother has seen a slight improvement since 2010, when it ranked at 132. Not all areas in Rother experience deprivation and it varies across the district, with the most deprived areas being Sidley (Bexhill), Central Bexhill Ward, Eastern Rother Ward, and the northwest of Rye Town Ward.

Economy and workforce

1.37 Rother has around 4,600 businesses, with small and micro businesses forming a fundamental part of the Rother economy, with 88 per cent of businesses employing less than 9 people. The district's employment base includes a strong visitor economy and local service component, with accommodation and food services and wholesale and retail. Rother also has a notable concentration of financial and insurance employment, alongside professional, scientific and technical activities, construction, health, education and land-based activity.

1.38 Tourism is noteworthy as some 5,800 jobs are in Rother are supported by the visitor economy and it is estimated that 21.6 per cent of the district's population is employed directly or indirectly as a result of tourism. With this employment profile, average salaries in Rother, at £35,320, are approximately £5,000 lower than for England at £40,339.[15]

1.39 In terms of the labour supply and workforce, the latest data shows that employment rates are below the national average, along with a higher proportion of those in Rother working part-time. Further, one-quarter of the district's working age population are economically inactive (not in employment and not actively seeking work). The proportion of those in Rother seeking Universal Credit or Job Seekers Allowance (3.2 per cent) is the same as the South East, and lower than for East Sussex (3.6 per cent). Some 38 per cent of the Rother working age population have a degree or higher, below the national average of 43 per cent, and 11 per cent have no qualifications.[16]

[15] Compiled from State of Rother 2025, Rother District Council and Rother Tourism and Visitor Accommodation Study, 2026.
[16] State of Rother 2025, Rother District Council.

Housing

1.40 Rother has a much higher proportion of owner occupancy and a much lower proportion of social housing compared to the national, regional and county averages. According to the 2021 Census, some 73 per cent of households are owner-occupiers.[17] Planning monitoring data indicates that new housing is largely for market sale tenure, with comparably less affordable housing products being delivered.[18] In 2022, there were over 2,000 households on Rother's housing register, and evidence points to continued need for affordable housing in the future.[19]

1.41 In 2024, the ratio of the median house price to the median gross annual income was 11.07 (workplace based). In other words, the average income earner employed in Rother needs 11 times their annual salary to buy an average priced property in Rother. The ratio of median house price to median gross annual workplace-based earnings in Rother has been higher than the England ratio over the last decade.

Climate change

1.42 Carbon dioxide emissions have been decreasing across Rother since 2005. This is mostly due to the decarbonisation of the national grid. In 2022, Rother's territorial greenhouse gas emissions were 411.2 kilotonnes CO2 equivalent (ktCO2e), 12.4% lower than 2021 and 10.5% lower than 2019. Emissions rose between 2020 and 2021 across all parts of the UK, including Rother, owing mainly to an increase in industrial emissions and post-pandemic transport emissions. Transport emissions have remained relatively consistent in recent years. In 2022, three sectors were responsible for over 90 per cent of emissions: transport (40 per cent), domestic (34 per cent), and industrial (17 per cent).[20]

Key strategic issues

1.43 The following strategic planning issues for Rother are listed below. These have been informed by the evidence base, the direction provided by the NPPF on plan-making, engagement with key stakeholders and public consultation feedback. The intention here is

[17] State of Rother 2025, Rother District Council.
[18] Authority Monitoring Reports, Rother District Council.
[19] Housing and Economic Development Needs Assessment Update.
[20] State of Rother 2025, Rother District Council.

to highlight the key issues at the strategic, district-level that are of particular importance to the preparation of the Local Plan and are therefore proportionate to the scope of it. This section does not necessarily, nor does it set out to, identify all of the issues that are or may be relevant to the district or the local areas within it.

1.44 The overarching strategic issue that cuts across those listed below is the need to accommodate growth in a sustainable way. There is a clear direction from the Government for local authorities to prepare Local Plans that address identified development needs, particularly to facilitate a significant boost in housing supply and delivery. Therefore, it is important that growth is carefully managed and coordinated in a way that respects local character and does not result in adverse impacts on communities and the environment – and indeed secures lasting improvements and benefits - in Rother, cumulatively across East Sussex and beyond.

1.45 Within the overall context of delivering sustainable development, the key strategic issues for the Local Plan are, in no particular order:

- Responding to the Council's declared Climate Emergency to set out local approaches for adapting to and mitigating the effects of global climate change, including by significantly reducing carbon emissions and effectively managing and reducing flood risk from all sources.

- Conserving and enhancing the natural environment (including protected habitats and species), delivering net gains for biodiversity, and enhancing the quality of the network of blue and green infrastructure, including the coastline and coastal areas.

- Protecting the character and quality of countryside, landscapes and dark skies, including by seeking to further the statutory purpose of the High Weald National Landscape, together with conserving and enhancing heritage assets and their setting in a way that reinforces and enhances Rother's local distinctiveness,

- Meeting Rother's identified needs for housing (including affordable housing, specialist housing, and accommodation for the gypsy, traveller and travelling showpeople community), along with needs for employment and commercial uses.

- Supporting businesses, cultural development and securing economic improvement, both in urban and rural areas of the district, in the context of wider national economic cycles and challenges.

- Improving the physical and mental health and wellbeing of the population and significantly reducing inequalities and deprivation by addressing the key determinants of these. This includes but is not limited to barriers and opportunities for people of all ages and abilities to live healthy and active lifestyles; good access to housing and a range of high-quality local jobs, training and education opportunities, as well as to local services and facilities, including sports and recreation; reducing and mitigating the population's exposure to all forms of pollution.

- Planning positively to meet the needs of people of all ages and abilities, including the needs of older people and an ageing population.

- Addressing deficiencies in infrastructure and securing the timely, coordinated delivery of new and improved infrastructure to support local communities and areas, particularly as new development comes forward.

Chapter 2: Vision, Priorities, Objectives & the Spatial Strategy

Vision for Rother

2.1 The Local Plan's future 'Vision for Rother' is informed by and aligns with the vision set out in Rother's Council Plan.[21]

Vision for Rother

By 2042
Rother District will be an attractive, desirable and affordable place to live, work and visit. The needs of all the local community will be met, with an emphasis on enhanced health and wellbeing for now and into the future. Bold solutions will have successfully addressed the climate and biodiversity emergencies and the housing crisis while protecting the High Weald National Landscape, our designated habitats, our heritage and our flood risk areas.

Development will be truly sustainable:
Major development will be focused in places where sustainable development can be achieved. All development will be net zero carbon ready and provide biodiversity net gain. Sensitive, sustainable, accessible and well-designed development that meets local housing and employment needs will be complemented by the timely delivery of supporting infrastructure. The district will contribute to the UK's carbon sequestration and nature recovery goals.

Quality of life will be enhanced:
Residents will be able to live well locally within safe, balanced and age-friendly communities, where residents and visitors of all ages and abilities can reach the facilities and services they need, often by active travel and public transport. The heritage and character of local areas will be protected and enhanced, with new, high quality and sensitively integrated development that respects Rother's local distinctiveness. Better local job opportunities will support flexible and changing working patterns with improved broadband coverage across the district.

Close working with key stakeholders including Parish and Town Councils will ensure that strategic planning priorities, objectives and policies are supported by our local communities, particularly through Neighbourhood Plans.

[21] Our Council Plan 2025-2029, Rother District Council.

Overall priorities

2.2 The Local Plan must set out strategic priorities for Rother and include policies to address these.[22] Following on from the Vision set out above, three overall priorities for the Local Plan are identified: Green to the Core, Live Well Locally, and A Thriving Local Economy. These overall priorities are explained below.

Green to the Core

2.3 Being 'Green to the Core' means taking bold action to tackle climate change and protect the natural environment. It requires that all planning decisions are made considering the climate emergency[23], the biodiversity crisis and the special characteristics of the High Weald National Landscape. The Local Plan should therefore help to deliver a radical reduction in carbon emissions locally, including by planning positively for sustainable transport, net zero housing and other types of development, and renewable energy. The plan should also ensure Rother plays a key role in the UK's nature recovery and carbon sequestration[24] goals by protecting and enhancing its landscape and environmental assets.

Live Well Locally

2.4 The concept of Live Well Locally means the creation and promotion of an inclusive and fair district that enhances the quality of life of Rother's local residents and communities. It requires that all planning decisions are made considering the need to provide healthy, safe, sustainable and inclusive neighbourhoods and communities that support residents and others across the age spectrum, including by providing access to high quality and affordable housing, jobs and training opportunities, services, leisure and other facilities. The Local Plan should therefore support the delivery of well-connected towns, villages and other rural areas, where people can meet most of their daily needs within a reasonable distance of their home, often by active travel. The Local Plan should also ensure new development respects and responds positively to Rother's local character, to

[22] Planning and Compulsory Purchase Act 2004 (as amended), Section 19.
[23] Rother District Council declared a Climate Emergency in September 2019.
[24] Carbon sequestration is the long-term capture and storage of atmospheric carbon dioxide in plants, soils, oceans, or geologic formations, achieved naturally or through technologies such as carbon capture and storage.

ensure places are not just visually appealing, but also inspire and foster a sense of belonging, identity, and shared experience.

A Thriving Local Economy

2.5 A Thriving Local Economy means that Rother is a place that businesses can invest in, where they choose to locate and are able to start up, grow and prosper. It also means that Rother is a place where residents and others have the opportunity to reach their potential through access to good quality jobs, training and education opportunities. The Local Plan should therefore support sustainable economic development, by helping to create the right conditions for business growth, including by ensuring there are a range of thriving employment locations, commercial centres and workspaces to meet local needs, as well as supporting rural economic activities. It should also help to promote and build on Rother's strengths as a key visitor destination.

Strategic spatial objectives

2.6 The following section sets out eleven strategic spatial objectives that the Local Plan aims to address. The objectives are informed by and respond to the current 'baseline' situation in the district (as set out earlier in the Portrait of Rother), the key strategic planning issues identified, the Council Plan and following on from this, the three Overall Priorities and the Vision for Rother. The objectives are considered to be 'spatial' in that they can be influenced and addressed by the land-use framework set in the Local Plan; which effectively sets guidelines for how land, space and resources in Rother should be used and managed.

Figure 2.1: Local Plan Strategic Spatial Objectives

Strategic Spatial Objectives
1. Mitigate and adapt to climate change, including by delivering net zero carbon ambitions, reducing flood risk from all sources and promoting the multifunctional benefits of green blue infrastructure through effective and supportive planning policies.
2. Respond to the housing crisis and help facilitate the delivery of housing to meet the needs of different groups in the community, ensuring a variety of high-quality sustainable, zero carbon ready dwellings that meet the needs and address the income levels of Rother's wider population for their lifetime.
3. Maximise opportunities for nature conservation, recovery and biodiversity net gain, protect sensitive habitats and conserve and enhance the natural beauty and historic landscape character of the High Weald National Landscape, while allowing for sensitive development that allows communities to thrive. Promote and secure environmental protection, including by seeking to improve water quality.
4. Promote high quality, inclusive design and protect and enhance the significance of Rother's built and natural heritage, including its setting, while providing opportunities for recreation and tourism.
5. Deliver sustainable growth and regeneration in Bexhill and its edges, along with Hastings Fringes, with supporting infrastructure, contributing to the needs of the wider housing and economic market area.
6. Create economic prosperity, both in rural and urban locations, meeting the employment needs of the wider population and local businesses, improving the quality and variety of jobs, and being flexible to the changing needs of the economy.
7. Focus growth in sustainable locations across the district, or places that can be made sustainable, through the timely delivery of strategic and other supporting infrastructure and community facilities.
8. Enhance the sustainability and connectivity of local communities through sustainable transport measures, including to support active travel, and improved internet network coverage.
9. Support and achieve safe, healthy, vibrant and mixed communities where the physical and mental health and well-being of residents is a high priority. Create high standards of inclusivity and accessibility to shared facilities for all the district's residents.
10. Balance strategic planning with the opportunities for local delivery through neighbourhood planning.
11. Deliver sustainable development by making the optimal use of land, including by prioritising the use of brownfield land and ensuring all new development is designed and built to appropriate densities, having regard to local context and character.

Planning positively, responding to Rother's local context

2.7 As previously noted, the NPPF provides that the Local Plan must set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for identified development needs, covering a minimum 15-year period. The following section sets out Rother's identified development needs for the plan and how these have been arrived at.

Development requirements

Housing needs

Amount of housing

2.8 The Local Plan must set a positive strategy for boosting the supply of homes and meeting the housing needs of local communities. The NPPF stipulates that the national 'standard method' should be used to assess the minimum amount of housing required in an area.[25] This takes existing housing stock estimates and applies an upward adjustment based on the affordability characteristics of the area. The standard method currently yields a housing requirement figure for the district of 895 net new dwellings per year.[26] Over the 17-year plan period of 2025-2042, this amounts to a need of 15,215 net new dwellings.

2.9 The national Planning Practice Guidance states that the standard method ensures that plan-making is informed by an unconstrained assessment of the number of homes needed in an area. It also confirms that the standard method does not produce a housing requirement figure.[27] Rather, the housing requirement is the minimum number of homes that a Local Plan seeks to provide during the plan period, having regard to land availability, constraints on development and any other relevant matters.

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[25] NPPF (2024), Paragraph 61. Further details on the standard method are set out in the Government's Planning Practice Guidance.

[26] Figure correct as of 2026. Inputs factored by standard method are expected to be updated annually by the Government (including 'housing stock estimates' and 'affordability ratios' for the district) and may result in the calculation of a revised local housing need figure, which will be monitored.

[27] PPG Reference ID: 2a-040-20241212

2.10 To consider such matters, a Housing and Economic Land Availability Assessment (HELAA) has been prepared to inform the Local Plan and to establish the housing requirement figure. The HELAA has been prepared in accordance with the guidelines set by the NPPF and the PPG. It demonstrates that the Council has 'left no stone unturned' in its process of identifying land in suitable locations and specific sites to meet Rother's identified development needs, including for housing. Over 900 potential development sites have been assessed through the study. All sites assessed as 'suitable, available and achievable' have been taken forward as site allocations in the Local Plan.

2.11 Despite this rigorous approach to identifying land for development, our evidence concludes that that there remains insufficient capacity to meet the Government's local housing need figure (i.e., standard method) for the district over the plan period. This is owing to the district's significant land-use constraints, discussed later in this chapter (and elsewhere in the evidence base). The Council has engaged with neighbouring and other authorities from the early stages of the plan process to identify whether they could assist in accommodating unmet housing needs arising in Rother; there are no authorities in such a position. Indeed, many other authorities in East Sussex and the South East are also facing challenges in meeting the Government's local housing need figure in full.

2.12 In light of the evidence base, the Local Plan sets a housing requirement figure of at least 8,671 net new dwellings over the plan period 2025-2042, or at least 510 dwellings annually (on average). This will facilitate a significant step change in housing delivery locally, well above the target of 335 dwellings per year set in the previous Rother Core Strategy Local Plan.

2.13 The housing requirement comprises various sources of housing land supply, as follows:

- Housing completions during the first year of the plan (1st April 2025 to 31st March 2026) - 264
- Planning commitments[28] – 688
- Site allocations in this Local Plan[29] – 6,862

[28] This is, in effect, the number of additional dwellings expected to come forward on large sites (5 dwellings plus) where development has commenced (as of August 2026).
[29] Large sites (5 dwellings plus) with an extant planning permission but where development has not commenced (as of August 2026) have been included as site allocations, rather than commitments.

- Housing number provided for Rye Neighbourhood Plan Review - 325

- Housing windfalls (from 4th year of the plan) – 38 units per year (532 units over 14-years)

2.14 Housing windfalls is a term used to describe housing built on land that is not specified in the development plan (i.e., sites that are not allocated with planning consent). It is normal for windfall sites to come forward as the Local Plan is generally not expected to account for all future housing development through its site allocation policies. Indeed, the NPPF allows local planning authorities to rely on windfall sites to count towards their anticipated future housing supply, where there is compelling evidence to do so.[30] A housing windfall assessment has been prepared as evidence to support this figure, and provides for a small site windfall allowance of 38 dwellings per year.[31]

Type of housing

2.15 The discussion above deals with the overall number of homes needed in Rother over plan period. Local communities have a wide range of housing needs relating to housing tenure and type. This includes but is not limited to family homes, affordable housing and specialist accommodation (such as supported care for older people). These types of housing need are not addressed by the standard method but through a separate assessment. A Housing and Economic Development Needs Assessment (2026) has been prepared to identify these wider housing needs, as required by the NPPF. Further details and policies to address these needs are set out in Chapter 3 of the Local Plan.

Economic development needs

Employment

2.16 The Government intends for the planning system to play a key role in building a strong and competitive economy. The NPPF makes clear that planning policies should help to create the conditions in which businesses can invest, expand and adapt. It also sets requirements for the preparation of Local Plans, including that they should identify sites to meet anticipated needs for economic development.[32]

[30] NPPF (2024), Paragraph 75.
[31] Rother Housing and Economic Land Availability Assessment.
[32] NPPF (2024), Paragraph 86.

2.17 Rother district and Hastings borough comprise a 'Functional Economic Market Area' (FEMA). The Housing and Economic Development Needs Assessment (HEDNA) Update (2026) assesses future employment needs for the FEMA and also breaks these down by authority area. For Rother, the study forecasts an additional 5,155 jobs across all main employment sectors over the plan period. This job growth is then translated into a future employment land requirement of 26.2 hectares.[33] The breakdown of this requirement by main sector (and associated Planning Use Class) is summarised in Figure 2.2 below.

Figure 2.2: Rother employment land requirement 2025-2042 (gross)

Description	Office	Industrial	Storage and distribution
Use Class	Class E(g)(i) and (ii)	Class E(g)(iii) and B2	Class B8
Need (hectares)	4.4	8.0	13.9

2.18 The rural economy plays an integral role in Rother. This includes but is not limited to agricultural, equestrian and tourism activities. These uses do not necessarily have the same land and floorspace requirements as traditional office and industrial uses, as assessed through the HEDNA, and some are main town centre uses (the needs for which are discussed below). Further details and policies for the economy are set out in Chapter 4 of the Local Plan (A Thriving Local Economy).

Retail and leisure

2.19 The NPPF states that planning policies should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation.[34] It goes on to set requirements for Local Plans, including that they should allocate of a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead.

2.20 The Rother Retail and Town Centre Uses Study Update (2026) includes a needs assessment for retail floorspace within the district, looking at both 'convenience' and 'comparison' goods, as well as related leisure uses. The assessment concludes that there is no need at the district-level for new (additional) retail and leisure floorspace over the plan period. Therefore, the Local Plan does not allocate land for new retail floorspace, except where small scale, local facilities are needed to support the Live Will Locally

[33] This is a forecast-led figure. In line with the NPPF and PPG, the study also sets out projections based on past completion trends, however it advises that these should be treated as a contextual indicator rather than a replacement for the forecast-led assessment.
[34] NPPF (2024), Paragraph 90.

priorities. However, this does not preclude new retail and leisure uses coming forward, where development proposals comply with other policies in the plan.

Accommodation needs for gypsies, travellers and travelling showpeople

2.21 The national Planning Policy for Traveller Sites (PPTS, updated 2024) sets out the Government's planning policy for gypsies, travellers and travelling showpeople. Paragraphs 4 and 9 of the PPTS confirm that local planning authorities should make 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.

2.22 Rother District Council has worked with the other East Sussex authorities to commission a joint Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (GTAA). This study sets out permanent and transit accommodation needs for gypsies, travellers and travelling showpeople across the county, and also across each district and borough, over the period 2021 to 2040.[35]

Gypsies and travellers

2.23 The GTAA (2022) identifies a need[36] in Rother for permanent pitches as set out in **Error! Reference source not found.**below.

Figure 2.3: Rother gypsy and traveller pitches requirement (2020-2040)[37]

	2021-2026	2026-2031	2031-2036	2036-2041	Total
Permanent pitch need (number of pitches)	14	4	5	5	28

2.24 Ten new pitches with permanent permission have been approved since the base date of the GTAA[38]. Deducting this from the GTAA pitch requirement, and adjusting the year

[35] East Sussex GTAA, 2022. An update to the GTAA is in progress and will provide the latest assessment of need to the end of the plan period of 2042; however, at the time of publication of this Regulation 19 document the GTAA Update has not been finalised.
[36] The GTAA 2022 pre-dates changes to the definition of "gypsies and travellers" in national planning policy although the "ethnic definition" used in the Assessment aligns with the current government definition (i.e. based on the ethnic identity of gypsies and travellers, not taking into account whether they have permanently ceased to travel or not). The need figures detailed here are those of the "ethnic" definition.
[37] East Sussex GTAA, 2022.
[38] 1 April 2021

brackets to account for the plan period, means that the overall outstanding requirement to 2040, which the Local Plan must provide for, is as follows:

Figure 2.4: Rother gypsy and traveller pitches outstanding requirement (2025-2040)[39]

	2025-2030	2030-2035	2035-2040	Total
Permanent pitch need (number of pitches)	6 (3 left over from 21-26, +3 from previous 26-31)	5 (1 from 26-31, +4 from 31-36)	6 (1 from 31-36, +5 from previous 36-40 figure)	17

2.25 The GTAA (2022) also assessed needs for transit sites, which provide temporary accommodation for gypsy and traveller households travelling through the area. The assessment found that while there may be a need for additional transit provision in the county, there is currently insufficient evidence to determine the number of additional transit pitches required. Consequently, the Local Plan includes a criteria-based policy to assess any proposals that come forward for transit sites, as per Policy HOU11 (Gypsies, Travellers & Travelling Showpeople).

Travelling showpeople

2.26 The GTAA (2022) found there are no travelling showpeople yards in the district, and just 1 yard in the county, in Wealden district. While there is expected to be a demand for a small number of additional plots for travelling showpeople to 2040, this is expected to arise from natural population growth and should be met close to the existing yard in Wealden. There is no specific evidence of travelling showpeople accommodation need within Rother. Therefore, a criteria-based policy will be used to assess proposals for windfall sites (either permanent or transit), as per Policy HOU11 (Gypsies, Travellers & Travelling Showpeople).

Boat dwellers

2.27 The GTAA also considered the accommodation needs of boat-dwellers but found that there is a lack of navigable waterways within East Sussex and few suitable locations for moorings, and a lack of evidence to quantify any accommodation need. There is very little history of proposals for boat dwellers' accommodation in the district and as such, a specific Local Plan policy is not necessary. Any proposals for this type of accommodation will be determined in accordance with the Local Plan as a whole.

[39] Taking account of pitches delivered/permitted between 1 April 2021 and October 2025.

Rother's local context and the effect on growth

2.28 There are opportunities for enabling growth and new development across the district. However, there are also challenges to facilitating significant growth owing to Rother's unique geographical context and highly protected environment, along with important heritage assets that need to be conserved. This local context presents land-use and development constraints that limit the scope for new major development. These constraints have been considered through the HELAA as well as other assessments during the plan's preparation.[40] Some of the key considerations and constraints are highlighted below.

High Weald National Landscape

As set previously, the High Weald National Landscape (HWNL) covers some 83 per cent of the district's area. It is a designated Area of Outstanding Natural Beauty (AONB) and forms an integral part of Rother's local character and distinctiveness. Public bodies have a legal duty to "seek to further the purpose" of AONBs, including the HWNL. The conservation and enhancement of natural beauty is the primary purpose of AONB legislation.

Protected habitats

2.29 Some 7 per cent of the district contains internationally or nationally protected habitats sites. These include the Pevensey Levels and the Dungeness Complex of Habitats Sites. Planning legislation provides that where an adverse effect on the integrity of a protected site cannot be ruled out, and where there are no alternative solutions, a plan or project can only proceed if there are imperative reasons of over-riding public interest and if the necessary compensatory measures can be secured.

Areas at risk of flooding

Throughout Rother there are areas at risk of flooding from a variety of sources. This is reflective of the district's coastal location and extensive river network, together with its geography, geology and historic pattern of development. These risks include tidal flooding (caused by extreme tide levels exceeding ground and/or defence levels), coastal flooding (linked to the stability of the coastline), fluvial flooding (which occurs concurrently with

[40] These include, for example, the Sustainability Appraisal, Habitats Regulations Assessment, Strategic Flood Risk Assessment, and Landscape Sensitivity Study.

surface water and sewer flooding), and groundwater flooding (caused by unusually high groundwater levels). In some cases, residential and other types of development will not be appropriate in these areas. Further details are set out in the Strategic Flood Risk Assessment.

Implications for plan-making

2.30 Paragraph 11(b) of the NPPF requires Local Plans to apply a presumption in favour of sustainable development, meaning that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, unless:

> (i) The application of policies in the NPPF that protect areas or assets of particular importance provide a strong reason for restricting the overall scale, type or distribution of development; or
>
> (ii) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the NPPF as a whole.

2.31 The policies referred to in part (i) include those relating to habitats sites, Sites of Special Scientific Interest and National Landscapes. In Rother's case, where some 90 per cent of the district includes the HWNL and protected habitats, these criteria are considered to be met.

2.32 Evidence gathered through the Local Plan process has demonstrated that there is insufficient suitable land to accommodate Rother's objectively assessed housing need in full. To do so would be likely to cause significant harm to protected landscape and habitats sites, directly contrary to national planning policy and legislation. Therefore, the application of policies in the NPPF relating to National Landscapes and habitats sites provide a rationale for restricting development in the district. Nevertheless, the Local Plan has taken a positive approach, directing development to suitable locations, allowing for sensitive growth including in rural villages, and maximising densities as appropriate.

A note on infrastructure

2.33 The district is lacking in some forms of infrastructure, in particular transport connections. There is no motorway and only one short stretch of dual carriageway. Evidence shows there are existing capacity problems on some parts of the trunk and local road network. While the district benefits from two mainline rail lines, journey times to London are long

compared to those in other parts of the South East. Bus services require improvements in terms of frequency and reliability, particularly in the rural areas. In common with much of the region, water supply and sewerage infrastructure is under significant pressure. It is not the role of the Local Plan to rectify existing issues, but it must plan positively for growth and local area improvement in the context of these challenges.

2.34 In order that growth and development is sustainable, new and improved infrastructure will need to be delivered in the right places and at the right time. An Infrastructure Delivery Plan (IDP) has been prepared, with input from infrastructure and service providers, and this indicates where there are existing deficiencies and future requirements in the district for different types of infrastructure to support growth over the plan period. The Local Plan includes policies to ensure that infrastructure is secured and effectively coordinated as new development comes forward, in line with the IDP. This includes Policies INF1 (Strategic Infrastructure Requirements) and INF2 (Transport Connectivity, Decarbonisation & Mitigation).

Policy SS1: Spatial Strategy for Rother

Status	Strategic
Priorities	Live Well Locally, Green to the Core, Thriving Local Economy
Strategic Objectives	2, 5, 6, 7

Sustainable and carefully managed growth

1. During the plan period 2025-2042, sustainable and carefully managed growth will be delivered in Rother to meet local needs for housing, employment, facilities and services together with supporting infrastructure. To achieve this, new development will be delivered in accordance with the spatial strategy (as illustrated in the Key Diagram) and provide for a minimum of:

    a. 8,671 new dwellings (average of 510 dwellings per year); and

    b. 26.2 hectares of employment land.

2. Whilst there is not an identified need for additional floorspace for main town centre uses[41], development proposals for these uses will be supported where they contribute to the vitality and viability of Rother's town centres and comply with other policies in the plan.

3. Identified needs for the gypsy, traveller and travelling showpeople community will be met through the provision of specific sites for pitches, in line with Policy SS5 (Strategy for Accommodation Needs of Gypsies, Travellers & Travelling Showpeople), together with windfall development of pitches, plots and transit sites, where necessary, in line with Policy HOU9 (Gypsies, Travellers & Travelling Showpeople).

4. Infrastructure required to support planned growth and new development will be secured and delivered in a timely manner, with reference to the Infrastructure Delivery Plan and in accordance with other Local Plan policies, including Policy INF1 (Strategic Infrastructure Requirements) and Policy INF2 (Transport Connectivity, Decarbonisation & Mitigation).

Spatial distribution

5. Growth and new development in Rother will be landscape-led with an overall pattern of development that reinforces and strengthens the natural

[41] Main town centres uses are defined by the NPPF.

beauty of the High Weald National Landscape, protects and enhances the network of blue and green infrastructure, and responds positively to the district's network of existing settlements, so that:

a. Bexhill will continue to act as a main transport, commercial and community hub, and support a network of settlements and communities surrounding it, which will benefit from their proximity to a wide range of services and facilities that are accessible by sustainable modes of transport.

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

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

a. West and North Bexhill to consolidate Bexhill as the most sustainable town, within the capacities of the existing transport network;

b. The towns of Battle and Rye which act as key transport hubs, along with the clusters of villages based around them;

c. Settlements on radial routes connected to the main urban areas of Bexhill and Hastings, allowing sensitive development in locations that rely on the larger towns for services and facilities;

d. Development at Hastings Fringes, providing sensitive growth;

e. Urban intensification and redevelopment across the district in appropriate and sustainable brownfield site locations;

f. Sensitive development in other rural settlements of the district; and

g. Growth along the A21 corridor, focussed within and around existing larger settlements.

Key evidence or guidance:

- Rother and Hastings Housing and Economic Development Needs Assessment (HEDNA) (2024) and update (2026)

- Housing and Economic Land Availability Assessment (2026)
- Rother Retail and Main Town Centre Uses Study (2023), Update and Addendum (2026)
- RDC Infrastructure Delivery Plan
- Rother Settlement Study (2024)
- High Weald AONB Management Plan 2024-2029
- Rother Density Study Update (2026)

2.35 The NPPF directs that the Local Plan must set out an overall strategy for the pattern, scale and design quality of places, whilst making sufficient provision for identified needs (including infrastructure) and also ensuring the protection and enhancement of environmental and heritage assets.

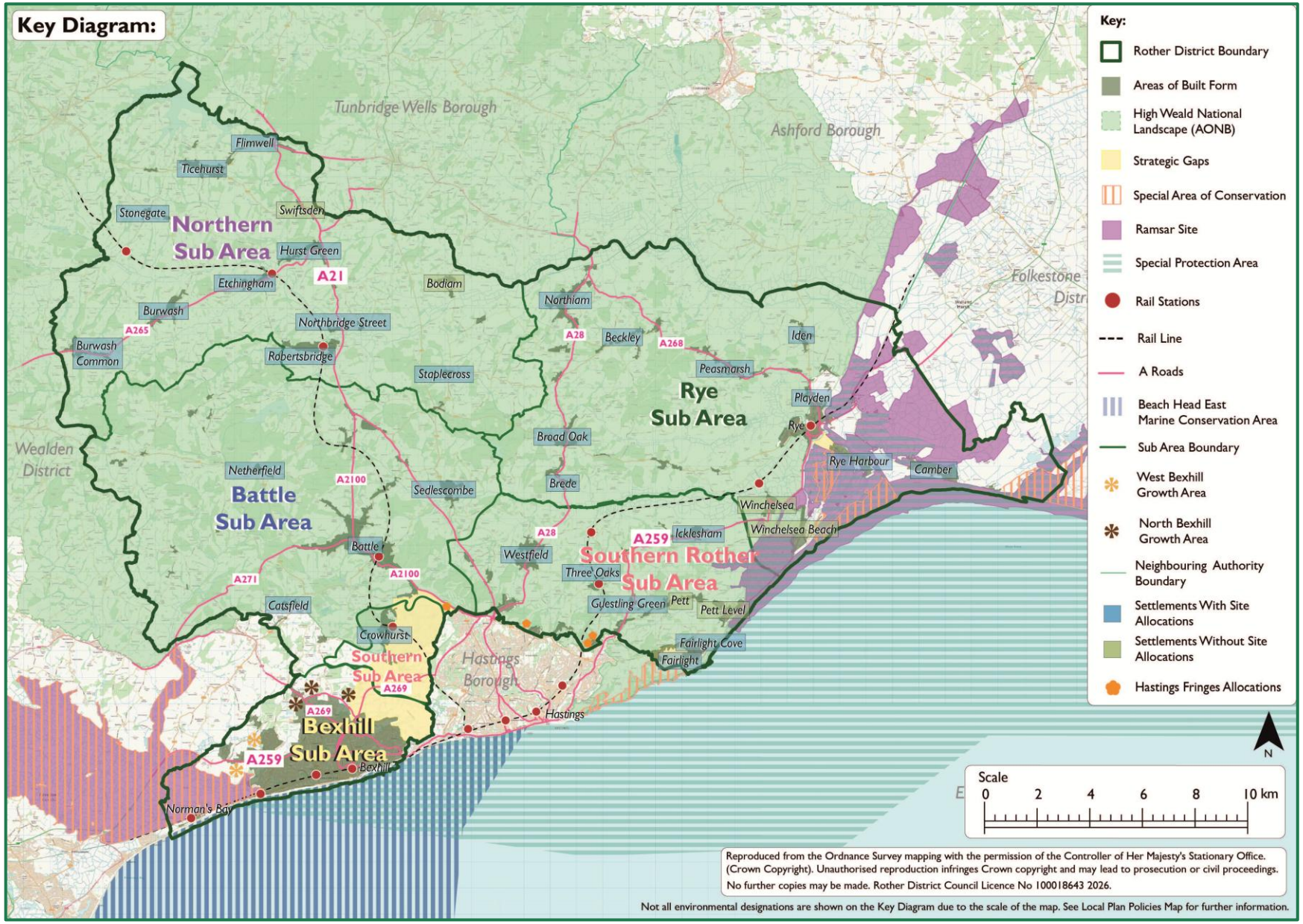
2.36 The spatial strategy is set in the context of achieving the Vision, Overall Priorities and Key Spatial Objectives set out earlier in the plan. It seeks to maximise opportunities for new development to meet identified local needs. The strategy has been informed by the overall sustainability of settlements within the district, as assessed in the Rother Settlement Study, and responds to the various physical and environmental features of the district, some of which preclude or inhibit significant new development from coming forward (such as areas at risk of flooding, protected habitats sites, heritage assets and the High Weald National Landscape). The strategy is also underpinned by the location and amount of suitable, available and achievable sites for new development, as identified through the Housing and Economic Land Availability Assessment.

2.37 Site allocation policies are included within the Local Plan at Chapter 8. These help give effect to the spatial strategy by making clear which sites are integral to its delivery and where different types of development will be supported in principle to meet local needs, particularly for housing.

Amount of development

2.38 As set out earlier in this chapter, development requirements over the plan period for housing, economic uses and accommodation for the gypsy, traveller and travelling showpeople community have been informed by assessments of need. They have also been informed by the HELAA and its findings of land that is suitable, available and achievable for development. Further, the development requirements have been set based on Rother's local context and in wider view of planning matters for delivering sustainable development, in line with the NPPF.

Figure 2.5: Rother District Key Diagram



Overall pattern of development

2.39 The spatial strategy broadly seeks to focus growth in and around existing settlements, helping to protect the character of the countryside. Existing settlements contain a comparatively good level and concentration of services and facilities, along with opportunities for people to access them using public transport and active travel. Whilst it is recognised that not all settlements benefit from the same level of such provision, focussing new development within them can support the delivery of new or improved local services along with supporting infrastructure. Key strategic locations for the spatial strategy include Bexhill, as the most sustainable town in the district, as well as the historic market towns of Battle and Rye. The fringes of Hastings and villages dispersed throughout the district, including some close to the A21 transport corridor, will also play a role in accommodating new development.

2.40 The rural setting of the district comprises differing landscapes and settings - from the network of villages and hamlets within the High Weald National Landscape, to the coastal areas connected to the main towns. It is important the growth in rural communities enables improvements to sustainable transport options, allowing residents access to neighbouring communities to share facilities and services. While the district currently has many isolated dwellings, farmsteads and commercial activities within the countryside outside of defined settlement areas, the spatial strategy prioritises growth within or on the edge of existing well defined built-up areas with good access to services, in order to facilitate sustainable development. In line with national policy, where opportunities for appropriate and policy compliant brownfield redevelopment arise these will be considered favourably. This will allow for windfall development to come forward on a site-by-site basis.

The High Weald National Landscape

2.41 The High Weald National Landscape (HWNL) is a national asset and an integral part of Rother's local character and distinctiveness. The HWNL is a designated Area of Outstanding Natural Beauty, which covers some 83 per cent of the district's area. National Landscapes have the highest form of protection in relation to landscape and scenic beauty. Under Section 85 of the Countryside and Rights of Way Act (2000), as amended,[42] public bodies have a legal duty to "seek to further" the statutory purpose of

[42] Amended by Section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act 2023.

protected landscapes (namely, the conservation and enhancement of their natural beauty).

2.42 The NPPF confirms that great weight should be given to conserving and enhancing the landscape and scenic beauty of National Landscapes. Further, it states that major development within them 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.[43]

2.43 The Local Plan has been prepared having regard to the legislative and policy framework for National Landscapes, together with the High Weald AONB Management Plan. The spatial strategy responds to these by seeking to focus development away from it. However, given the significant identified needs for housing and other types of development in the district over the plan-period, as well as the need to secure the long-term viability and sustainability of settlements within it, it is necessary make provisions for a limited amount of new development in this area. Site allocation policies are included in the Local Plan which help give effect to the spatial strategy. Allocations within the HWNL have been subject to rigorous assessments, considering their impact on the National Landscape, and include detailed requirements to ensure new development on them is appropriate. Whilst acknowledging that there are a small number of site allocations that will constitute major development in the HWNL, it is considered appropriate to include them in the context of meeting identified local housing needs.

2.44 Further requirements for development proposals within or likely to affect the HWNL are set out in Policy LAN2 (High Weald National Landscape).

Growth opportunities for the sub-areas

2.45 Figure 2.6 below provides a summary of the growth opportunities and development potential of Rother and the five sub-areas, established by site allocations within the Local Plan (and the housing requirement provided for the Rye Neighbourhood Plan Review)[44]. The table reflects the outcomes sought by the spatial strategy.[45] Chapter 8 provides

[43] NPPF (2024), Paragraphs 189-190.
[44] Note that the figures in this table do not include completions or commitments (as defined in footnotes 27 and 28) or windfalls, these are instead counted for the whole district at paragraph 2.13.
[45] Figures are provided for housing and employment. Figures for retail are not included as evidence indicates there is no need for additional floorspace at the district level, however some site allocations make provision for this.

further details on the boundaries, vision and planning policies for each of the sub-areas (including site allocations).

Figure 2.6: Summary of Growth Opportunities for Sub-Areas (as reflected in site allocations)[46]

Sub Area – Total Growth	Total housing (dwelling nos)	Total employment floorspace (sqm)
Bexhill	4,474	78,225
Southern Rother and the Hastings Fringes	377	6,000
Battle and surrounding settlements	800	12,971
Rye and the eastern settlements	737	18,480
Northern Rother settlements	799	4,200
TOTALS	**7,197**	**119,876**

[46] The total housing no. for Rye and the eastern settlements includes the housing requirement of 325 dwellings provided for the Rye Neighbourhood Plan Review (2026). The total employment figure for Rye and the eastern settlements includes employment floorspace expected to come forward as a result of identified sites within the Rye Harbour Employment Area as detailed in the HELAA, rather than specific site allocations.

Policy INF1: Strategic Infrastructure Requirements

Status	Strategic
Priorities	Live Well Locally, Green to the Core, Thriving Local Economy
Strategic Objectives	7, 8

Infrastructure capacity and provision

1. Development must be supported by necessary infrastructure. Development proposals will be supported where there is sufficient infrastructure capacity; or where proportionate infrastructure improvements or contributions will be delivered or secured to mitigate the impacts arising from the development in a timely manner.

2. Where a development proposal requires additional infrastructure capacity to be deemed acceptable, mitigation measures must be agreed with the Council and the appropriate infrastructure provider. Such measures may include (but are not limited to):

    a. Financial contributions towards new or expanded facilities and the maintenance thereof;

    b. On-site provision of new facilities;

    c. Off-site capacity improvement works;

    d. The provision of land; and

    e. The cost of transport impact monitoring.

3. For major development proposals, developers and landowners are expected to engage early (including at the pre-application stage) with the Council, statutory consultees (including neighbouring authorities), town and parish councils and specific consultation bodies (including relevant infrastructure providers) to ensure that individual and cumulative impacts of development are considered and mitigated to an acceptable level at the appropriate time, in line with published policies, the Infrastructure Delivery Plan, and relevant guidance.

Funding mechanisms

4. Where a proposed development, either alone or cumulatively with other developments, generates infrastructure impacts or requirements, applicants will be required to make direct provision or contribute towards

the delivery of the relevant infrastructure, including where this is set out in the Infrastructure Delivery Plan and other policies in this Plan, provided that such contributions are compliant with national policy and the legal tests (being necessary, directly related, and fairly and reasonably related in scale and kind to the development).

5. Where necessary, legal agreements (such as Section 106 and Section 278 agreements) and planning conditions (including Travel Plan modal share monitoring targets) will be used to secure site-specific infrastructure, land, monitor and manage commitments, and financial contributions that are not secured via CIL.

Exceptions

6. Exceptions to full infrastructure mitigation will only be considered in exceptional circumstances where the applicant submits a fully transparent, open-book Viability Assessment which proves that full mitigation would make the development unviable.

7. Where exceptions are accepted:

    a. Applications must demonstrate that any residual level of harm resulting from reduced infrastructure provision is mitigated to an acceptable level; and

    b. S106 agreements will be used to require viability review mechanisms and clawback clauses, for the purpose of securing additional infrastructure mitigation or financial contributions in the event that development viability improves prior to the completion of the development.

Governance and delivery

8. The Council will work in partnership with statutory consultees (including neighbouring authorities), specific consultation bodies (including relevant infrastructure providers), and relevant working groups (such as a Transport Infrastructure Management Group), to oversee the coordinated delivery, monitoring, and phasing of strategic infrastructure required to support the Local Plan.

Key evidence and or guidance:

- RDC Infrastructure Delivery Plan
- ESCC Developer Contribution Calculation
- Rother Local Plan Viability Assessment (2026)

2.46 National planning policy requires local planning authorities to ensure that sufficient infrastructure is provided to support sustainable development and growth. This policy provides the mechanism to ensure that growth in Rother is sustainable and adequately mitigated, in compliance with standard legal tests and the Community Infrastructure Levy (CIL) Regulations.

Context

2.47 Future housing and employment growth across Rother, combined with projected demographic shifts, will clearly place pressure on existing infrastructure capacity. The unique geography of the district with distinct rural communities, historic market towns, and coastal areas—presents specific challenges in delivering utility, transport, education, and healthcare networks. Without robust mechanism controls, cumulative minor developments risk overwhelming local systems, while major strategic sites require strict phasing to prevent infrastructure lag.

2.48 The Council's Infrastructure Delivery Plan (IDP) identifies the type, location, delivery timeframe, and funding mechanisms of the infrastructure required to support planned growth. This will be a 'live' document that is updated regularly. This document is a critical part of the Local Plan evidence base.

2.49 It is important to note that its delivery is not always in full control of the Council. It is dependent on partnership working between a variety of public, private and voluntary sector agencies known as 'infrastructure providers'. As such the Council is heavily reliant on the expertise and advice of these external providers to determine what is needed to support development in the plan and to deliver the required infrastructure.

2.50 The Council has undertaken engagement with key infrastructure providers and organisations to understand their various strategies and programmes and to start identifying the infrastructure required to support proposed development, as well as to seek their views on the impacts of our development strategy on infrastructure needs for the district. Ongoing engagement will be required to ensure the effective delivery of infrastructure in the right place at the right time.

Infrastructure planning

2.51 Infrastructure can be described as the supporting services, facilities and utilities that are necessary to support growth and development across the district. It can be strategic in

nature, supporting growth across the whole or part of district, or it can be local in nature, supporting specific development sites. The term is wide reaching and comprises physical, social and green/blue infrastructure (open space and water), ranging from telecommunication facilities through to public transport measures, sports pitches, schools and health facilities.

2.52 "Necessary infrastructure" in this policy refers to that required to make a development acceptable in planning terms. They can be physical infrastructure (e.g., transport links, utility connections), social infrastructure (e.g., health facilities, school places), or green and blue infrastructure (e.g., open space).

2.53 It is anticipated that the majority of minor developments will meet their infrastructure obligations through standard CIL payments where liable, or utility connection processes. Section 106 planning obligations will only be sought from minor schemes where necessary to make the development acceptable in planning terms.

2.54 Section 106 planning obligations and infrastructure contributions can only be used to mitigate the impacts generated by the proposed development itself. They cannot be sought to resolve pre-existing infrastructure deficits or historic service shortfalls (such as existing GP waiting times or existing school capacity constraints). Where existing infrastructure is under strain, applications will be assessed on whether the developer has adequately mitigated the specific additional demand created by their proposed scheme.

2.55 Developers and landowners are encouraged to engage early with the Council, statutory consultees[47] and specific consultation bodies[48] at pre-application stage to proactively address the infrastructure requirements alongside compliance with external statutory policies, strategies, and guidance.

Delivery

2.56 Infrastructure delivery will be secured through a combination of direct delivery by developers, Section 106 planning obligations, conditions attached to planning permissions, Section 278 agreements and unilateral undertakings, the CIL charging regime, and external funding sources.

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[47] Statutory consultees are defined under Schedule 4 of the Town and Country Planning (Development Management Procedure) (England) Order 2015

[48] Specific consultation bodies are defined under Regulation 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012

2.57 CIL will be allocated according to the Council's internal CIL governance protocols and spending priorities. The Council's annual Infrastructure Funding Statement will state the type of infrastructure for which development contributions will be sought and will detail overall spend and delivery of infrastructure at a district level. Parish Councils have their own duty to publish details of their spend and delivery of infrastructure from CIL payments.

Exception and clawback

2.58 Where a viability exception is justified and accepted, the Council will protect the public interest by requiring viability review mechanisms (clawback clauses) within the S106 agreement. These legal clauses mandate a reassessment of the development's economics at specific milestones (e.g., prior to completion or phase transitions). If market conditions improve, costs fall, or sales values rise beyond the initial projections, the clawback mechanism will capture some of the surplus to fulfil the deferred infrastructure contributions or financial obligations. Any Viability Assessment will be subject to an independent scrutiny by Council-appointed experts at the applicant's cost.

Policy INF2: Transport Connectivity, Decarbonisation & Mitigation

Status	Strategic
Priorities	Live Well Locally, Green to the Core, Thriving Local Economy
Strategic Objectives	7, 8

Sustainable patterns of movement

1. All development proposals should be located and designed to support sustainable patterns of movement, enable good accessibility for different users and make the most of existing and proposed transport infrastructure, in accordance with Policy LWL2, LWL3 and LWL4.

Highway safety and network capacity

2. All development proposals should be capable of proceeding without having a severe adverse impact on the transport network (in terms of capacity and congestion, including cumulative impacts), or an unacceptable impact on highway safety, taking into account any mitigation measures proposed as well as any wider network improvements.

3. Applications meeting the thresholds and technical requirements set out by East Sussex County Council (the Local Highway Authority), National Highways and other relevant statutory consultees will be required to demonstrate compliance with criterion (2) via the submission of:

    a. A Transport Assessment or Transport Statement, which robustly addresses the vehicular, cumulative, and multi-modal impacts of the scheme, including engagement with National Highways where there is a likely material impact on the Strategic Road Network, and with neighbouring authorities (including Kent County Council) where there are potential cross-boundary impacts; and

    b. A Travel Plan, incorporating a comprehensive Monitor and Manage Strategy, setting out how sustainable travel targets across all modes will be implemented, monitored, and secured across the construction, build-out, and operational phases.

Securing mitigation and funding

4. Where transport mitigation is required to make a development acceptable, planning conditions (including Travel Plan modal share monitoring targets) and legal agreements (including Section 106 and Section 278 agreements) will be used to secure any monitor and manage commitments, site-specific infrastructure, necessary physical works, performance bonds, and commuted sums for long-term maintenance.

5. Where transport mitigation, whether addressing site-specific or cumulative impacts, is contingent on monitored performance, it will be managed through a Monitor and Manage framework to ensure measures are appropriately phased, triggered, and funded by developers proportionate to their impact. Where a Monitor and Manage strategy is approved and implemented, these conditions and agreements will require funding for traffic monitoring and may also require contributions into ring-fenced escrow accounts to secure contingency mitigation or interventions.

6. Strategic mitigation addressing district-wide traffic growth to facilitate development will be supported through CIL and external funding mechanisms.

Key evidence:

- RDC Local Plan Transport Assessment
- East Sussex Local Transport Plan 4 (LTP4 2024–2050)
- East Sussex Rail Strategy (2025)
- East Sussex Freight Strategy (2025)
- East Sussex Local Cycling and Walking Infrastructure Plan (2020)
- East Sussex Electric Vehicle Strategy (emerging)

- East Sussex Bus Service Improvement Plan

2.59 The NPPF requires development to prioritise sustainable transport modes and safeguard network safety and capacity. Department for Transport (DfT) Circular 01/22 (Strategic Road Network and the Planning System) sets out how impacts on national trunk roads must be managed. Policy INF2 also aligns with the overarching vision of the East Sussex Local Transport Plan 4 (LTP4 2024-2050) and translates these national and regional requirements into a local framework. It aims to decouple development from unsustainable private car use, maximise travel choice, protect network safety, and ensure necessary site-specific mitigation is fully funded.

Rother's challenges

2.60 Rother's rural-urban geography and dispersed settlements drive a high reliance on private cars. The Strategic Road Network, specifically the A21 and A259 corridors, therefore, often suffers from capacity constraints. Evidence from the East Sussex Local Transport Plan and the Local Plan Transport Assessment shows that while single developments may have negligible impacts, their cumulative effect will degrade highway safety and network efficiency if left unmitigated.

2.61 The Local Plan Transport Assessment highlights the scale of this car dependency. Private vehicles account for 69% of all commuting trips to and from the district. This reliance is even starker for cross-boundary travel: about 40% of all local commutes are bound for Hastings, Wealden, Eastbourne, and Kent, and over 80% of these journeys are made by car. Meanwhile, public transport is used for just 3% of trips within Rother, lagging far behind neighbouring districts like Hastings (10%) and Eastbourne (9%).

2.62 Shifting commuters toward sustainable travel is complicated by Rother's unique combination of physical, operational, topographical and demographic challenges:

- On the roads, key junctions on the A21 and A259 corridors are already operating at or near capacity during peak hours. On the tracks, the Hastings rail line is capped by power supply constraints, while the Marshlink line remains restricted by single-track sections and un-electrified diesel services.

- In our rural and northern settlements, hilly terrain and a lack of footways and cycleways naturally discourages walking and cycling.

- Rother, and Bexhill in particular, has an older average population compared to other areas of the county. This, together with the topography and rural nature of much of the district, makes accessibility and the uptake of active modes more challenging.

- With road transport driving nearly 45% of the district's carbon emissions, securing developer-funded infrastructure mitigation is critical to meeting the Council's target of carbon neutrality by 2030.

Sustainable patterns of movement

2.63 To comply with this policy, development proposals should prioritise active travel and public transport over private vehicular movements. Further requirements are set out in Policies LWL2 (Facilities and Services for Residential Development), LWL3 (Active Travel, Public Transport Connections & Services Outside the Site) and LWL4 (Active Travel & Public Transport Within Sites).

Highway safety and network capacity

2.64 Proposals likely to materially impact the A21 or A259 must be accompanied by evidence of early technical engagement with National Highways regarding the Strategic Road Network (SRN).

2.65 Development proposals must fully account for cross-boundary transport impacts. Where a development potentially impacts the highway network beyond Rother's administrative area, applicants must actively consult with East Sussex County Council, Kent County Council and relevant neighbouring authorities to ensure the wider impacts are sufficiently mitigated.

2.66 Applicants should also refer to the requirements set out in LWL3 regarding the content of the Transport Assessment and/or Statement. Applicants must also adopt the "Monitor and Manage" and "Vision and Validate" principles, in accordance with DfT Circular 01/22 and national planning policy.

Securing mitigation and funding

2.67 Transport mitigation to address impacts from development will be legally secured via planning conditions and Section 106 and Section 278 agreements under the Highways Act

1980 (or any subsequent updated version). Transport mitigation refers to the physical infrastructure works (such as junction modifications, traffic calming, cycleways, or pedestrian crossings), contributions to public transport, as well as behavioural initiatives required to eliminate, reduce, or offset the traffic impacts of a development, or to promote sustainable patterns of movement.

2.68 To prevent conflict or duplication with Rother's CIL framework, funding for transport mitigation is delineated across three distinct mechanisms:

a. CIL funding: Allocated only towards strategic, district-wide transport infrastructure to address cumulative traffic growth and to support development. This is subject to the Council's internal CIL governance protocols and spending priorities.

b. Standard developer contributions (S106 and S278 agreements): Strictly restricted to site-specific mitigation and access required to make an individual site acceptable in planning terms, delivered at the outset or agreed phase of development.

c. Monitor and Manage obligations (secured via S106 agreements): Used where transport obligations are contingent on monitored performance across the construction, build-out, and operational phases. Transport impacts of development sites will be monitored against agreed Travel Plan targets throughout the development lifecycle, with interventions triggered when the modal share or traffic targets are breached. S106 agreements will be used to secure developer funding towards Travel Plan auditing, administrative costs, and pre-agreed contingency fallback mitigations.

2.69 To protect the public interest against delivery failure, the Council will consider securing planning obligations through performance bonds (contract bonds) prior to the commencement of physical highway works. A performance bond acts as a financial guarantee provided by an approved third-party surety, such as a bank or insurance company. In the event that a developer defaults, goes into liquidation, or fails to complete the agreed highway works, the bond enables the Council or Highway Authority to draw down the secured funds to finish the infrastructure themselves, ensuring no financial liability falls on the public purse.

2.70 To coordinate Monitor and Manage transport measures, the Council will convene a Transport Infrastructure Management Group (TIMG) (nominally titled). The TIMG will

include representatives from Rother District Council, East Sussex County Council, National Highways, and other relevant key delivery partners.

2.71 Where a Monitor and Manage strategy is approved and implemented, to mitigate financial exposure and protect public resources, the ongoing technical and administrative costs of collecting and auditing the site's trip monitoring data must be fully funded by the developer. Additionally, the Council may require contributions into ring-fenced escrow accounts to secure contingency mitigation. Contingency mitigation refers to pre-agreed fallback measures, such as physical junction modifications, highway capacity improvements, or public transport service enhancements, required if the site's sustainable travel measures fail to meet targets. Both the performance thresholds and the specific fallback mitigations must be identified through the initial Transport Assessment and contractually agreed upfront within the legal agreement. This ensures that funds can be immediately deployed if post-occupation monitoring reveals that sustainable travel targets have been missed.

Policy SS2: Development Boundaries

Status	Strategic
Priorities	Green to the Core, Live Well Locally
Strategic Objectives	7, 11

1. Development boundaries, as defined on the Policies Map, establish the areas within sustainable settlements where new development will be directed to and supported, provided it complies with the Local Plan policies.

2. In the countryside (i.e., outside of development boundaries), development shall be limited to that which accords with specific Local Plan policies or that for which a countryside location is demonstrated to be necessary.

3. Both within and outside of development boundaries, priority is given to the appropriate reuse of brownfield sites, in line with other Local Plan policies, in order to make efficient and sustainable use of previously developed land.

Key evidence or guidance:

- Housing and Economic Land Availability Assessment (2026)
- Rother Settlement Study (2024)

2.72 Development boundaries differentiate between areas of built form within sustainable towns and villages, where further development (including redevelopment or intensification) will be acceptable in principle, and the countryside.

2.73 Development boundaries are a key tool to positively focus growth on sustainable settlements and the networks and clusters of villages identified in the development strategy. This approach protects the surrounding countryside around them from unnecessary and intrusive development. The substantial High Weald National Landscape coverage of the district is a further key justification for carefully managing development in the countryside.

2.74 Within development boundaries, development will principally be on allocated and identified sites, together with other sites where proposals accord with relevant Local Plan policies. There is a presumption that infilling, redevelopment and changes of use will be acceptable subject to other policies of the Local Plan. This process of 'gentle densification' will help to support sustainable communities to "Live Well Locally". Proposals within development boundaries are still subject to other policies to ensure that development does not adversely impact on other interests of acknowledged importance. Policies LWL1 and LWL5 are particularly relevant to ensuring that such development makes efficient use of land and is designed so as not to prejudice future connectivity or, where relevant, the coordinated development of adjoining land.

2.75 While land outside development boundaries is regarded as 'countryside' for planning policy purposes, it does include some villages, hamlets and farmsteads. A countryside location does not prevent appropriate development. The potential for development outside development boundaries to support vital rural communities and also conserve or enhance its intrinsic qualities is recognised. For example, Policy HOU11 (New Dwellings in the Countryside) recognises that there are some limited circumstances where new dwellings may be permitted in the countryside, including dwellings necessary to support farming and other land-based industries. In exceptional circumstances rural needs for affordable housing or specialist housing for older people may be met through Policies HOU3 (Rural Exception Sites & Community-led Development) and Policy HOU7 (Specialist Housing for Older People) respectively. There are also specific policies to promote a sustainable rural economy, including Policies ECO9 (Agricultural Development & Forestry) and ECO10 (Agricultural Diversification) in relation to the requirements of farming and agricultural diversification, and Policies ECO7 (Tourism Activities, Facilities & Accommodation) and ECO8 (Holiday Sites & Accommodation) in relation to tourism.

2.76 Development boundaries form policy lines and they do not necessarily represent the exact edge of settlements as such. While development boundaries will normally follow physical boundaries, on occasion, the full depth of property curtilages may be excluded to make clear a policy statement that back land or in-depth development is unacceptable, often because of its additional visual or amenity impact. This approach is consistent with the National Planning Policy Framework, which highlights the need to recognise 'the intrinsic character and beauty of the countryside' and the need to manage patterns of growth to realise opportunities for walking, cycling and use of public transport, with significant development focused on locations which are or can be made sustainable.

2.77 Figure 2.7 provides a table which shows the settlements which have development boundaries. Note that all of these are defined through this Local Plan other than Rye, which is in the Rye Neighbourhood Plan. Development boundaries are illustrated on a plan for each settlement in Chapter 8 of this Plan, although due to the scale, these plans are indicative. For further detail please see the Policies Map.

Figure 2.7: Settlements with Development Boundaries

Bexhill	Battle
Hastings Fringes	Rye
Beckley	Burwash
Brede and Cackle Street	Burwash Common
Broad Oak	Burwash Weald
Camber	Crowhurst
Catsfield	Flimwell
Etchingham	Netherfield
Guestling Green	Hurst Green
Fairlight Cove	Peasmarsh
Icklesham	Robertsbridge
Iden	Sedlescombe
Northiam	Stonegate
Pett	Ticehurst
Rye Harbour	
Staplecross	
Three Oaks	
Westfield	

Policy SS3: Strategic Green Gaps

Status	Strategic
Priorities	Green to the Core, Live Well Locally
Strategic Objectives	3, 4

1. Within the Strategic Green Gaps, as defined on the Policies Map, development will be carefully controlled. Development will only be permitted where it is unobtrusive and does not detract from the openness of the area having regard to the specific objectives of the gaps, which are as follows:

    a. To maintain the separate identity and distinctiveness between settlements;

    b. To maintain the strategic settlement pattern; and

    c. To prevent the coalescence of settlements.

2. Enhancement of the gaps through effective landscape management which strengthens and reinforces their significance will be supported.

3. Within the Bexhill and Hastings/St Leonards Strategic Green Gap, development proposals for a ground mounted solar installation (a solar farm) for a temporary period at Pebsham Landfill Site, Freshfields will be supported in principle in line with Policy GTC6 (Renewable & Low Carbon Energy) and other policies of the Plan.

4. The extent of each of the five strategic gap areas is described below:

Bexhill and Hastings/St Leonards Strategic Green Gap

a. The Gap between the two towns is relatively small, being particularly narrow along the A259 corridor, and hence any encroachment would be significant. Its location and accessibility mean that it is highly vulnerable to development pressure. The accessibility of the Gap between Bexhill and Hastings has changed with the construction of Combe Valley Way, which increases the vulnerability of the countryside between Bexhill and Hastings/St Leonards. The Gap includes the Combe Haven valley and its tributary valleys in order to protect this open landscape between the two settlements.

Crowhurst and Hastings/St Leonards Strategic Green Gap

b. The construction of Combe Valley Way has increased the vulnerability of the Gap between Hastings/St Leonards and the village of Crowhurst. The area between the built-up edge of Crowhurst and the Hastings to London railway line is also included as it contributes to the open area between the settlements.

Battle and Hastings/St Leonards Strategic Green Gap

c. The Gap between Battle and Hastings/St Leonards provides an important function in maintaining the separate identities of Battle and the built-up area of Hastings/St Leonards. The break in the ribbon development between the edge of Telham and the Hastings Borough boundary at Breadsell Farm is highly vulnerable to change particularly in more open areas and the higher ground and ridges.

Fairlight and Hastings Strategic Green Gap

d. The Gap between the Hastings Borough boundary and the edge of Fairlight Cove provides an important function in protecting the general openness of the area between the Hastings Country Park and the edge of the settlements of Fairlight and Fairlight Cove. The area south of Battery Hill and Hill Road and to the east of Coastguard Lane, including The Close, is vulnerable to incremental change and infill development; hence, it is also included to conserve the area's open character.

Rye and Rye Harbour Strategic Green Gap

e. The open Gap between Rye citadel and Harbour Road industrial area/Rye Harbour village provides an important function in retaining their distinct identities. The area is fragile and vulnerable to encroaching development, as well as incremental changes in landscape management. The retention and protection of this Gap is important to the conservation and enhancement of local landscape character and views, notably with regard to the setting of the Citadel. The Gap also incorporates the sensitive riverside margin adjacent to the River Brede and River Rother.

Key evidence or guidance:

- Rother Settlement Study (2024)
- Rother Green and Blue Infrastructure Study (2026)

2.78 Strategic Green Gaps are important in terms of guiding the location of development. Development within these gaps is strictly limited to maintain their openness, although the

policy does allow for unobtrusive development which does not detract from the openness of the area having regard to the specific objectives of the strategic green gaps.

2.79 The policy specifically allows for the development of a solar farm at Pebsham Landfill site within the Bexhill and Hastings/St Leonards Strategic Green Gap. This is further detailed at Policy GTC6 (Renewable & Low Carbon Energy). This does not give a blanket acceptance to solar farms within the Strategic Green Gaps, as any such proposal would need to be considered on its merits in line with the requirements of the policy, however the Pebsham Landfill site offers a unique opportunity to provide for this development on a temporary basis while the landfill itself settles and remains unavailable for other uses.

2.80 The location and extent of the Strategic Green Gaps are illustrated on the following three maps, Figure 2.8 to Figure 2.10. Please note that due to scale, these maps are indicative only. For further clarity please see the Policies Map.

Figure 2.8: Strategic Green Gap at Bexhill, Crowhurst and Battle

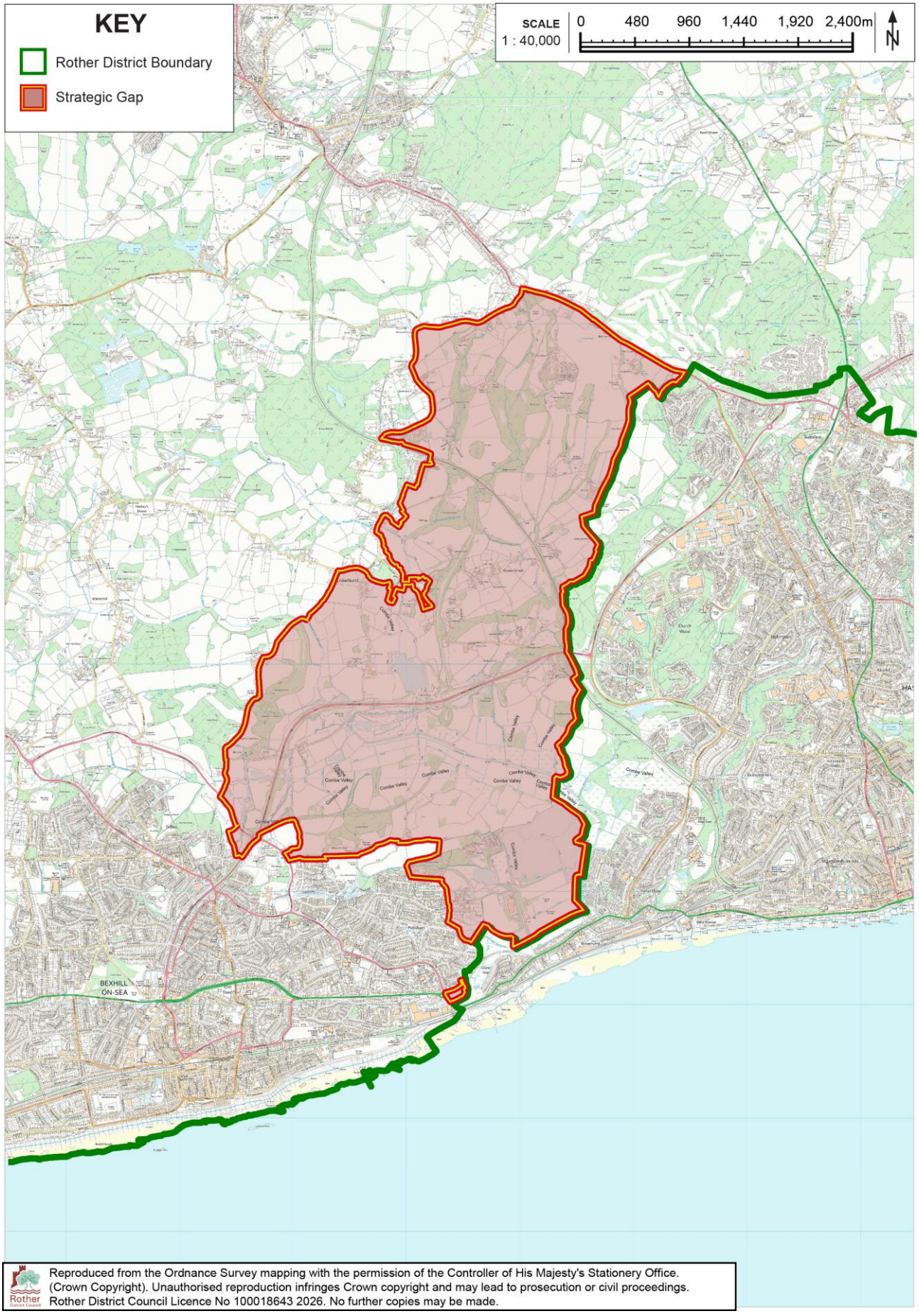


Figure 2.9: Strategic Green Gap at Fairlight

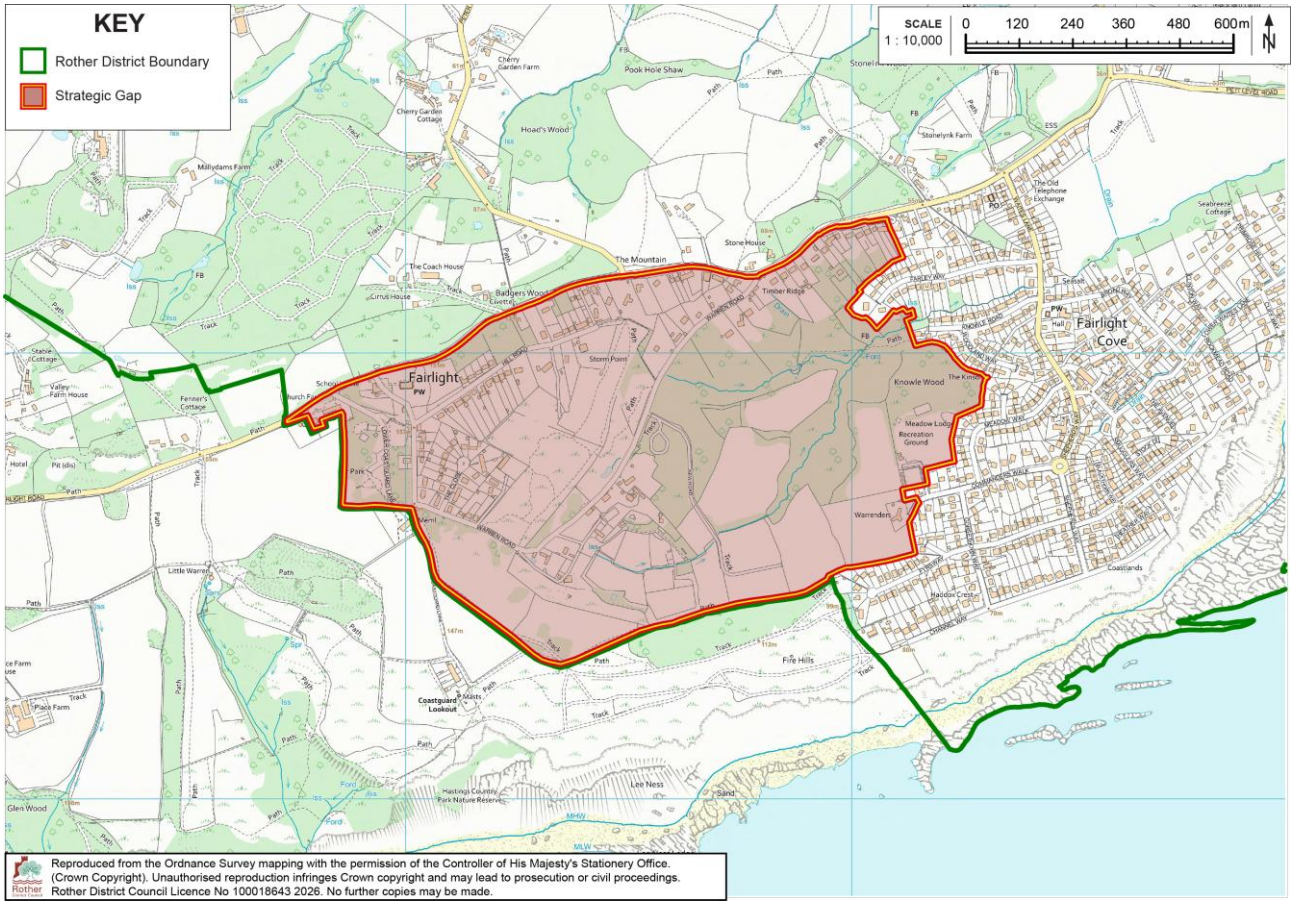
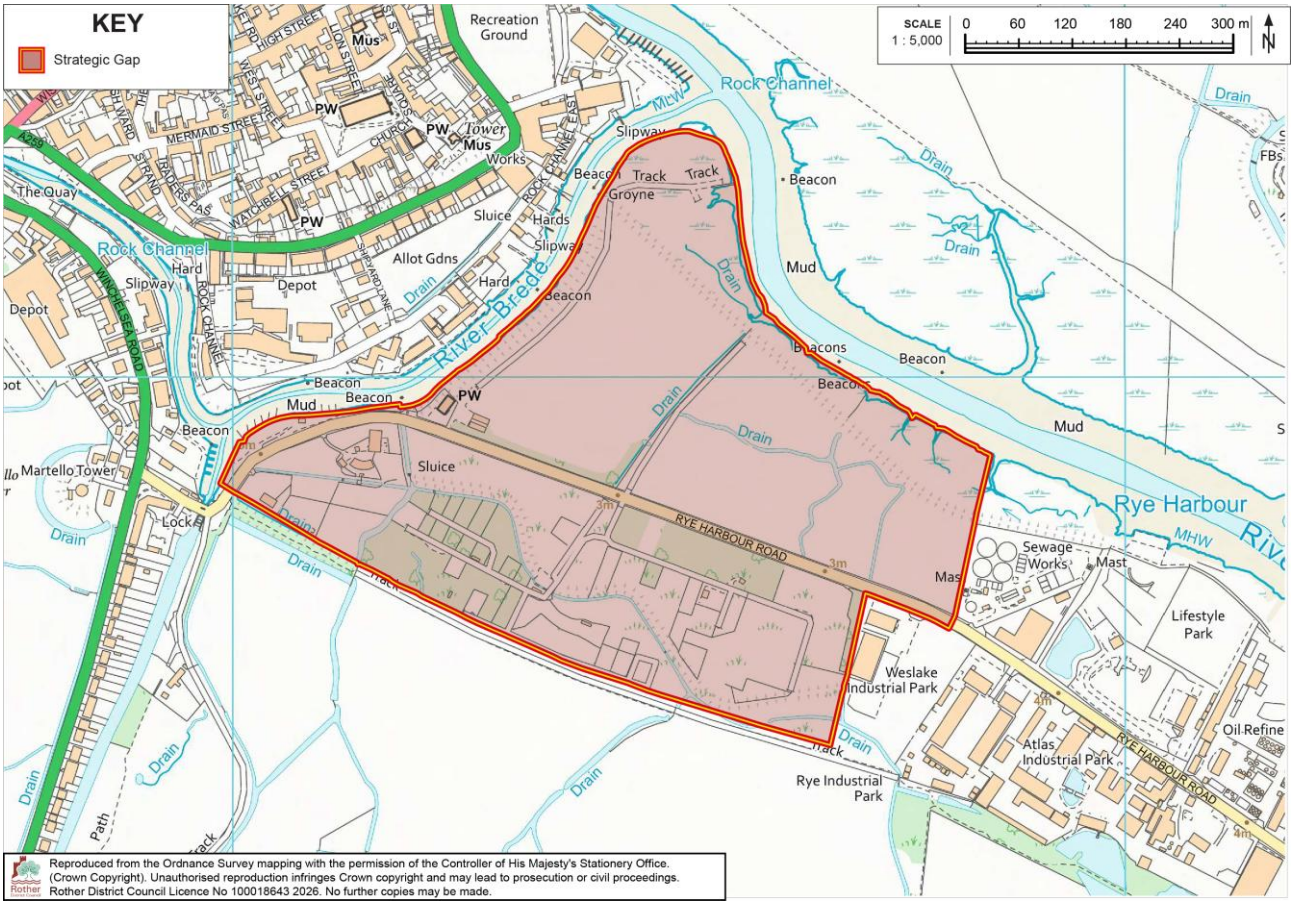


Figure 2.10: Strategic Green Gap at Rye



Policy SS4: Strategy for the Countryside

Status	Strategic
Priorities	Live Well Locally, Green to the Core, Thriving Local Economy
Strategic Objectives	2, 3, 4, 6, 7, 9

1. The Countryside is an integral and defining feature of Rother that contributes significantly and positively to the district's local and historic character and distinctiveness. The overarching strategy for the Countryside, including the High Weald National Landscape and the undeveloped coast, is to ensure that its intrinsic character and beauty is safeguarded and enhanced, for the benefit of local communities and the environment.

2. New development within the Countryside should be strictly limited to that which is shown to be necessary to meet identified local social and economic needs and appropriately supports: rural economic activities (including agriculture, horticulture, viticulture, forestry and equestrian uses) as well as tourism; outdoor sport, leisure and recreation; cemeteries and burial grounds; nature conservation, restoration and enhancement; and infrastructure.

3. To help achieve the delivery of the strategy for the Countryside, new development will be carefully managed whilst providing support for:

    a. Measures that support people's enjoyment of the Countryside, particularly by maintaining and improving appropriate access to and within it, together with enhancing opportunities for leisure and recreation.

    b. Agriculture, forestry, equestrian and other land-based rural economic activities, in line with Policies ECO9 (Agricultural Development & Forestry), ECO10 (Agricultural Diversification), and ECO11 (Equestrian Developments).

    c. Growing the visitor economy, in line with Policies ECO7 (Tourism activities, facilities and accommodation) and ECO8 (Holiday Sites & Accommodation).

    d. Development that meets identified local needs for housing and economic development, in line with Policies SS1 (Spatial Strategy for Rother), HOU3 (Rural Exception Sites & Community-led

Development), HOU11 (New Dwellings in the Countryside) and ECO1 (Supporting a Thriving Local Economy).

e. The delivery of infrastructure required to support local communities and to enhance accessibility within and between rural settlements and areas, helping to support the Live Well Locally priority, in line with Policies INF1 (Strategic Infrastructure Requirements) and INF2 (Transport Connectivity, Decarbonisation & Mitigation).

4. Development proposals must make a positive contribution to the Countryside and be sensitive to its local context, with reference to the Local Plan as a whole. This will require that development conserves and enhances the intrinsic rural character and beauty of the Countryside, including landscapes and landscape features, dark skies, heritage assets and their setting, biodiversity and other components of the natural environment.

Key evidence or guidance:

- High Weald AONB Management Plan 2024-2029
- East Sussex 2050 Economic Prosperity Strategy
- Rother Settlement Study (2024)
- Rother Green and Blue Infrastructure Study (2026)

2.81 As a predominantly rural district, the countryside of Rother district is a defining characteristic. The term countryside refers to those areas outside of defined Development Boundaries, as established by Policy SS2 (Development Boundaries) and illustrated on the Policies Map. National planning policy provides a clear direction that the intrinsic character and beauty of the countryside should be safeguarded and sets out the different types of development that are acceptable outside of development boundaries.

2.82 This policy, together with other Local Plan policies, seeks to safeguard the beauty and intrinsic character of the countryside, including its landscape and heritage character, whilst supporting prosperous communities. It provides the basis for ensuring that the countryside is protected and maintained as a working landscape that supports land-based agricultural and related rural activities, together with tourism, through sustainable land management practices. It also acknowledges the important role that the network of green and blue infrastructure has in terms of the countryside's ecological and amenity value. As well, the policy acknowledges the settlements and communities dispersed throughout the countryside, and the need to secure their long-term vitality by provision of limited and new high-quality development, such as housing and social infrastructure, which is sensitively designed and appropriate to its unique local context.

Policy SS5: Strategy for Accommodation Needs of Gypsies, Travellers and Travelling showpeople

Status	Strategic
Priorities	Live Well Locally, Green to the Core
Strategic Objectives	

1. To meet the identified accommodation needs for the gypsy, traveller and travelling showpeople community, provision will be made in Rother for 17 permanent pitches between 2025 and 2040.[49] These will be delivered in phases as follows:

    a. 2025-2030: 6 pitches

    b. 2030-2035: 5 pitches

    c. 2035-2040: 6 pitches

2. In accordance with the national Planning Policy for Traveller Sites, sites or broad locations are allocated in the Local Plan to provide for this number of pitches, taking into account any pitches granted permission and delivered since the start of the plan period. Any remaining residual needs for pitches, plots and transit sites from the overall identified needs, will be met through windfall development, in accordance with Policy HOU9 (Gypsies, Travellers and Travelling Showpeople).

Key evidence and or guidance:

- East Sussex Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (2022)

2.83 The national Planning Policy for Traveller Sites (PPTS, updated 2024) requires local planning authorities to identify, and update annually, a supply of specific, deliverable sites sufficient to provide 5-years' worth of sites against their locally set targets; and a supply of specific, developable sites or broad locations for years 6-10, and where possible, for years 11-15.

[49] The Local Plan period is to 2042. The current evidence (East Sussex GTAA, 2022) considers the period to 2040. From 2025 this does allow for 15 years, in line with the requirements of the national PPTS. The GTAA Update will address provision over the plan period.

2.84 The outstanding need figures for Rother, which derive from the East Sussex Gypsy and Traveller Accommodation Needs Assessment[50], take account of new permissions granted in the interim, are reflected in the strategy above.

2.85 Sites identified to meet the need must be deliverable, either through being (or proposed to be) publicly owned, owned by gypsies/ travellers, have a willing landowner or, possibly, be part of a comprehensive development scheme that addresses a wider range of housing need.

2.86 Site allocations are set out in Chapter 8 of the Local Plan. Pitches have been identified through the site allocations, which will contribute to meeting the supply required between years 1 and 10 of the Plan.

Policy SS6: Neighbourhood Plans & Parish Priority Statements

Status	Strategic
Priorities	Live Well Locally, Green to the Core
Strategic Objectives	2, 10

1. Parish and town councils are encouraged to prepare and review Neighbourhood Plans and Parish Priority Statements to set out a vision and priorities for the future of their local areas, having regard to the Local Plan.

Housing targets

2. To support the delivery of the Local Plan, the following housing targets are for Neighbourhood Areas, covering the plan-period, are set out below.

Neighbourhood Area	Outstanding NP allocations carried forward[51]	Additional dwellings[52]	Housing target (2026-2042)[53]	Met through the Local Plan

[50] East Sussex GTAA, 2022.

[51] Including sites not yet completed or commenced (outstanding dwellings on commenced sites are counted as commitments, as per footnote 27). Excluding any sites allocated in the NP for less than 5 dwellings, and excluding sites allocated in the NP that are not expected to come forward.

[52] Comprised of additional sites allocated through the Local Plan (including any previous Local Plan allocations carried forward) and additional capacity included in NP allocations carried forward.

[53] Excluding completions 1 April 2025-31 March 2026, and excluding commitments as defined in footnotes 27 and 28.

Battle	53	546	599	Yes
Bexhill	0	4474	4474	Yes
Burwash	0	80	80	Yes
Crowhurst	30	19	49	Yes
Etchingham	0	40	40	Yes
Fairlight	0	35	35	Yes
Hurst Green	22	183	203	Yes
Peasmarsh	5	121	126	Yes
Rye	0	0	325	No
Salehurst and Robertsbridge	180	127	307	Yes
Sedlescombe	54	62	116	Yes
Ticehurst	14	120	134	Yes

Housing supply and delivery pending Neighbourhood Plans

3. Until such time as a Neighbourhood Plan for the relevant settlement with an outstanding Local Plan housing requirement is in force, development proposals will be favourably considered in those settlements where:

    a. They contribute to meeting the housing target for that settlement and accord with the relevant spatial strategy; and

    b. The site and development proposals are otherwise suitable having regard to other relevant policies of the Local Plan.

Key evidence and or guidance:

- Rother and Hastings Housing and Economic Development Needs Assessment (HEDNA) (2024) and update (2026)
- Housing and Employment Land Availability Assessment (2026)
- Neighbourhood Plans in the district

2.87 In Rother, Neighbourhood Development Plans (or Neighbourhood Plans) are prepared by parish and town councils. They set out a shared vision and planning policies for local areas. Neighbourhood Plans that are 'made' (adopted) form part of the Statutory Development Plan. There are nine such Neighbourhood Plans in the district[54], as set out earlier in the plan.

2.88 The Levelling Up and Regeneration Act 2023 introduced and sets provisions for Parish Priority Statements. These provide another way for communities to set out a vision and priorities for the future of their local areas. Whilst Parish Priority Statements do not

[54] As of August 2026.

form part of the Development Plan, they can nonetheless help to inform the preparation and implementation of planning policies. Parish and town councils are encouraged to have regard to the Local Plan when preparing or updating their Neighbourhood Plans and Parish Priority Statements, as this can help to ensure coordination in the overall approaches to planning and investment in their local areas.

2.89 The NPPF sets out that the Local Plan should include strategic policies which set out a housing target for adopted Neighbourhood Areas to ensure they make a contribution to the overall housing requirement for the district (or an indicative figure in cases where it is not possible to provide a target). This policy sets outs out housing targets for the relevant areas. The NPPF makes clear that Neighbourhood plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies.[55]

[55] NPPF (2024), Paragraph 30.

Chapter 3: Delivering New Homes

Policy HOU1: Mixed & Balanced Communities

Status	Strategic
Priorities	Live Well Locally, Thriving Local Economy
Strategic Objectives	2, 3, 4, 8, 9

1. In order to support mixed, balanced and sustainable communities, housing developments will be considered in accordance with the following criteria:

    a. Subject to the other criteria in this policy, all housing developments must be of a size, type and mix which will contribute to meeting both current and projected housing needs within the district and locally;

    b. In all major housing developments (ten or more units) that include market housing, at least 30% of the market housing shall comprise one- or two-bedroom dwellings (being mostly two bed). A higher percentage than 30% will be appropriate and required where the most up-to-date evidence demonstrates a higher need;

    c. Affordable housing shall be required in accordance with Policy HOU2. The exact mix of affordable housing sizes and types shall be identified through discussions with the Council. The starting point for discussions is that the majority of dwellings for social or affordable rent shall be of one and two bedrooms and the majority of intermediate affordable dwellings for sale shall be of two and three bedrooms, subject to identified local affordable housing needs;

    d. Developments comprised exclusively of affordable housing will be supported in principle, in locations which accord with the Live Well Locally policies including in relation to access to services and public transport;

    e. In larger developments (six or more units), a mix of housing sizes and types to meet the needs of a range of differing households should be provided, unless the particular characteristics of the proposal or site makes this inappropriate;

    f. Other than in exceptional circumstances, proposals that would result in a net loss of dwelling numbers (for example conversion of flats into a single dwelling) will be resisted; and

    g. Proposals for Build-to-Rent accommodation, including as part of wider housing developments, will usually be supported in areas well-served by public transport. A minimum of 20% of Build-to-Rent accommodation will be required to be provided as affordable rent homes (and maintained in perpetuity), as set out in the Planning Practice Guidance.

Key evidence and or guidance:

- Rother and Hastings Housing and Economic Development Needs Assessment (HEDNA) (2024) and Update (2026)
- Local Plan Viability Assessment (2026)

3.1 Rother and Hastings forms one Housing Market Area (HMA) due to the strong commuting links and migration flows between the two areas. Consequently, the two Councils have jointly commissioned a Housing and Economic Development Needs Assessment (HEDNA) (Update 2026). The HEDNA considers population characteristics and expected growth and sets out recommendations for an overall housing mix over the Local Plan period for each Council area by tenure and number of bedrooms. The recommendations for Rother are detailed in Figure 3.1 below. The actual mix to be delivered in a development will be determined on a site-by-site basis.

Figure 3.1: Recommendations for Housing Mix by Tenure for Rother district (HEDNA Update 2026)

Housing Mix by need	1-bed	2-bed	3-bed	4+ bed
Owner occupied (market and private, overall average)	9%	34%	36%	21%
Affordable home ownership (based on private rented sector occupancy)	24%	45%	24%	7%
Affordable/ Social Rent (based on Housing Register)	43%	29%	20%	8%

3.2 The figure shows that going forward, there will be a need for all sizes of properties in the district. Policy HOU1 requires housing developments to be of a size, type and mix which will contribute to meeting both current and projected housing needs within the district and locally. On larger schemes, particular consideration should be given to providing for different household types and differing age ranges, where the site is suitable to accommodate this. This could include, for example, a proportion of ground floor dwellings to meet the needs of older residents, such as terraces of small bungalows with gardens, for which there is a demand, or flats to suit younger households including single professionals in appropriate locations.

3.3 Over the Local Plan period there is expected to be particular growth in the number of households aged over 75, and in smaller households (single people and couples).

Evidence[56] shows that currently, many smaller, older households occupy larger (three-bedroom plus) properties. Three-bedroom properties are also the most popular sized dwelling for families aged under 65, with or without dependent children. While in the owner-occupied sector there will continue to be a significant demand for three-bedroom properties over the Plan period, providing more smaller properties could encourage some households to down-size. In the social rent and private rent sectors, more growth is expected in households requiring one- and two-bedroom properties.

3.4 The HEDNA recommends that the suggested proportions of one and two-bedroom market dwellings are considered a minimum, and higher proportions should be encouraged, where appropriate. This is likely to depend on the characteristics of individual sites, including the scope for incorporating flats within developments. Higher proportions may be appropriate in those parts of the district with the greatest elderly populations.

3.5 Consequently, to meet the needs of the population over the Plan period, the policy requires a minimum of 30% market dwellings in major schemes to be of one or two bedrooms. A higher proportion could be appropriate if the latest evidence at the time, such as the Council's Housing Strategy, shows a greater need. The benefits of providing smaller dwellings include improved affordability and enabling 'rightsizing' for older households. To protect the existing supply of small dwellings there is also a presumption against loss of dwelling numbers other than in exceptional circumstances. Examples of exceptional circumstances that could justify the loss of a dwelling could be where the proposal meets another specific Local Plan objective, for example, a change of use to a residential care home or tourist accommodation where a need exists, in accordance with Local Plan policy, or a proposal to create a House of Multiple Occupation (HMO) in accordance with Policy HOU4 (which is counted as a single dwelling, although it accommodates multiple households).

3.6 In the social and affordable rented sector, the Council's Housing Register indicates a significant need for one-bedroom homes, particularly for older people, but also some family housing. Many older existing tenants wish to transfer to a small bungalow rather than a flat, so they can have a garden. The HEDNA (2024) recommends that the targets for this sector are applied flexibly to optimise the delivery of affordable housing. For

[56] HEDNA (2024)

intermediate affordable housing for sale, the HEDNA recommends that two and three-bedroom dwellings are prioritised to meet the needs of young families.

3.7 Due to the significant need for affordable housing in Rother, schemes proposing 100% provision of affordable housing are supported. For sustainability reasons and to ensure appropriate access to services, these developments should usually be located in settlements with a good level of services and access to public transport. Rural exception sites outside development boundaries are considered separately through Policy HOU3 (Rural Exception Sites &. Community-led Development).

3.8 The starting point for discussions with the local authority on the tenure mix of 100% affordable housing schemes should be to prioritise social and affordable rented accommodation where possible, in accordance with Policy HOU2 (Affordable Housing). At the same time, it is accepted that in some instances, in 100% affordable schemes, a higher proportion of dwellings for affordable home ownership may be appropriate where this can be justified on viability grounds or due to local circumstances (for example where there is an existing higher level of social/ affordable rented accommodation in the settlement).

3.9 Build-to-Rent (BTR) schemes are supported in principle in appropriate locations, in order to diversify the supply of housing and help meet demand for good quality, secure, private rented accommodation. BTR developments should comprise 20% affordable housing, in line with the Planning Practice Guidance. BTR is a relatively new but increasingly popular mechanism for delivering homes in the private rented sector, although schemes have, to date, been focused largely in urban areas. It is distinct from other forms of private rented housing because BTR homes are designed and built for long-term renting, offering longer tenancies to occupiers.

3.10 The private-rented sector is an increasingly important source of homes in Rother, particularly for younger age groups, given the high numbers of people unable to afford to purchase a property on the open market and the low level of social rented housing compared to the national average. However, the supply of private rental property is limited. The Council has developed its Housing, Homelessness and Rough Sleeping Strategy (2025-30), to be implemented on a cross-departmental basis, which amongst other things, sets out priorities and actions to improve the quality and suitability of existing housing, including in the private rented sector.

3.11 It goes without saying that all new dwellings, including those arising from conversions and changes of use, will be required to provide a good standard of amenity for future occupiers in accordance with Policy DEV1 (General Development Considerations) and to be constructed using sustainable methods and materials, incorporating low carbon and energy efficient design, and renewable energy generation, in accordance with the Policies of the Green to the Core chapter.

Policy HOU2: Affordable Housing

Status	Strategic
Priorities	Live Well Locally
Strategic Objectives	2, 5, 9

1. Affordable housing will be sought on all qualifying housing development sites.

2. On housing sites or mixed-use developments delivering a net increase of six or more dwellings within the High Weald National Landscape and ten or more dwellings outside the High Weald National Landscape, or where the site has an area of 0.5 hectares or more outside the High Weald National Landscape, a minimum of 30% of the gross number of residential units on greenfield sites and 10% on brownfield sites must be provided[57] as on-site affordable housing provision, unless off-site provision or an equivalent financial contribution in lieu can be robustly justified.

3. When considering sites that include a mix of both greenfield and brownfield land, a site will be considered greenfield land when at least 50% of the site is greenfield.

4. Developments providing a level of affordable housing in excess of these minimum proportions will be considered favourably.

5. Where a site-specific viability assessment, prepared by a suitably qualified professional, demonstrates the minimum requirements set out above cannot viably be met as part of an otherwise suitable development, the proportion of affordable housing must be the most that does not undermine viability. This will be independently reviewed at the applicant's expense.

6. Where the Council agrees an affordable housing level below the policy compliant percentages set out above, the Council will secure a review mechanism through a planning obligation requiring viability to be reassessed, at the developer's expense,

[57] Note that these percentage requirements do not apply to Build-to-Rent schemes or the Build-to-Rent portion of a mixed scheme, as the affordable housing percentage requirements of Build-to-Rent developments are set out in Policy HOU1.

over the lifetime of the construction of the development and initial sales period, to ensure that the maximum affordable housing contribution viable, up to the policy requirement, is provided.

7. Affordable housing provided in accordance with criterion (2) above shall comprise the following tenure mix:

    a. 20% Social Rent;

    b. 50% Affordable Rented; and

    c. 30% Affordable Home Ownership.

8. The different housing tenures to be provided on any site (market housing, affordable housing for rent and affordable housing for sale) should be well-integrated and designed to the same high quality to create tenure-neutral and socially inclusive homes and spaces. On mixed market/ affordable developments, the affordable housing shall be apportioned in small clusters across the whole site and where this is not proposed it should be robustly justified.

9. In all cases, planning permission will be subject to a planning obligation to set out definitions, tenure split and nomination rights and to ensure the affordable housing remains as such in perpetuity (allowing for staircasing provisions for shared ownership homes as appropriate).

Key evidence and/or guidance:

- Rother and Hastings Housing and Economic Development Needs Assessment (HEDNA) (2024) and update (2026)
- Local Plan Viability Assessment (2026)

3.12 This policy sets out the minimum percentages of affordable housing that will be required from developments in different parts of the district and has been informed by viability analysis. The aim is to prioritise meeting the affordable housing needs of the most vulnerable groups wherever possible, reflected in the policy requirement for social rent. The delivery of social and affordable rented property is prioritised in line with the Council Plan[58] which seeks to increase the availability of affordable homes, prevent homelessness and support residents into housing. Dwellings delivered as Affordable Rented (as per criterion 7b) will be capped at the Local Housing Allowance rates.

3.13 The policy also applies to 100% affordable housing developments within development boundaries (which are supported in principle through Policy HOU1 (Mixed & Balanced

[58] 2025-2029

Communities) and developments involving specialist housing for older people, as set out in Policy HOU7 (Specialist Housing for Older People).

3.14 In line with national planning policy, affordable housing should be provided on site, in accordance with the thresholds set out in the policy. There may be exceptional cases where on-site provision is not possible, in which event, off-site provision or a financial contribution[59] equivalent to the cost of delivering the affordable dwellings elsewhere together with the increased value of the development without on-site provision will be required.

3.15 To meet the policy requirements, where the affordable housing requirement results in a unit number which is not a whole number, the number of units required on-site will be rounded down to the nearest whole figure. The 'unmet' proportion of a unit will be funded through an in-lieu contribution equivalent to the cost of providing that part unit on-site.

3.16 Where proposals are made for fewer than 10 dwellings outside the High Weald NL and fewer than six dwellings in the High Weald NL, the Council will have regard to whether the size of the site would make it capable of accommodating more than that number of dwellings, and hence, include affordable housing provision. In these instances, where appropriate, the Council will require applicants to justify that the proposed number of dwellings makes efficient use of land in accordance with the NPPF and other Local Plan policies including Policy LWL1 (Efficient Use of Land & Appropriate Densities). Proposals which do not make efficient use of land, having regard to other Local Plan policies, will be refused.

3.17 Development viability remains a key consideration throughout the district and has worsened in recent years due to multiple factors including the rising cost of materials and interest rates, although this could be subject to change over the new Local Plan period. Therefore, while the policy requirements are justified and evidenced through the Local Plan Viability Assessment in accordance with the Planning Practice Guidance (and are thus considered generally viable), it is acknowledged that there may be occasions when it is not possible for developments to provide a policy compliant level of affordable housing for viability reasons. However, given the potential for viability to change over time and indeed, throughout a project, the policy requires any deviation from the required affordable housing contribution to be robustly justified and supported by a site-specific

[59] Financial contributions in-lieu of on-site provision will be required by S106 Agreement.

viability assessment prepared by a suitably qualified professional, such as one accredited by the Royal Institute of Chartered Surveyors. This will be reviewed independently at the developer's expense. Any planning permission where a policy-compliant level of affordable housing is not achieved will be subject to a planning obligation which includes a review mechanism to require viability to be reassessed during the lifetime of a project in order to maximise affordable housing provision.

3.18 Housing should be tenure-neutral, meaning that all affordable housing should be indistinguishable from market dwellings. There should be no segregation or difference in quality between the tenures (affordable rented, intermediate housing for sale, and open market), in terms of siting, accessibility, environmental conditions, external façade or materials. Homes of all tenures should be represented in equally attractive and beneficial locations, and there should be no differentiation in the positions of entrances. Shared open or play spaces should be accessible to all, regardless of tenure. Successfully integrating the affordable rented and shared ownership units provides a sustainable, balanced and mixed community which brings many social and economic benefits. To achieve this, affordable units should be provided in small clusters throughout the site, up to a maximum cluster of five houses or ten flats.

3.19 In accordance with Policy DEV2 (Comprehensive Development & Masterplanning), where a site comes forward as two or more separate planning applications, of which one or more falls below the appropriate threshold, the Council will seek an appropriate level of affordable housing on each part to match in total the provision that would have been required on the site as a whole.

Policy HOU3: Rural Exception Sites & Community-led Development

Status	Strategic
Priorities	Live Well Locally
Strategic Objectives	2, 9

Rural Exception Sites

1. Planning permission may be granted for small-scale residential development outside development boundaries in order to meet an identified local need for affordable housing in rural areas. Such development will be permitted where the following requirements are met:

a. It helps to meet an identified local housing need for affordable housing (in terms of dwelling mix, type and tenure) as evidenced through a local housing needs survey or secondary data which is no more than five years old;

b. The site is well related to an existing settlement and its services, in accordance with the Live Well Locally policies including access to public transport;

c. The identified local housing need cannot reasonably be met within the settlement's development boundary (if it has one); and

d. The development is acceptable in terms of its impacts on the character of the rural area, the settlement and the landscape, and meets other normal local planning criteria.

2. In all cases, planning permission will be subject to a planning obligation to ensure that the affordable housing remains available to meet local housing needs in perpetuity, and that people with local connections are given highest priority in both initial and future occupancy.

3. A small amount of enabling open market housing will be acceptable where it is demonstrated, with viability evidence, that it is the minimum necessary for the delivery of a suitable scheme, having regard to the criteria above.

Community Led Development

4. Community-led development, as defined in the NPPF, comprising small-scale residential development outside development boundaries, will be permitted where the proposal will secure clear benefits to the community, and is acceptable in terms of its impacts on the character of the rural area, the settlement and the landscape, and meets other normal local planning criteria.

Key evidence and/or guidance:

- Rother and Hastings Housing and Economic Development Needs Assessment (HEDNA) (2024) and update (2026)

3.20 National planning policy encourages local planning authorities to support opportunities to bring forward "rural exception sites" to deliver affordable housing to meet identified local needs, and "community-led development", in locations where sites would not normally be used for housing. It may be appropriate to allow a small proportion of market housing on rural exception sites where it is necessary to ensure the overall viability of the site.

3.21 Rural exception sites are distinct from other sites proposed for 100% affordable housing (covered by Policy HOU1) due to their location outside development boundaries. To justify an "exception" to policy, rural exception sites must meet additional criteria as set

out in this policy, including reflecting identified local need in terms of the development size and the tenure, mix and cost of the dwellings. In addition, it needs to be demonstrated that the housing need cannot be reasonably met within the existing development boundary (if one exists) to ensure that sites located in more sustainable locations are considered first before seeking development outside of defined development boundaries.

3.22 The affordable housing delivered through this policy will remain as such in perpetuity and will be secured by a planning obligation. This means that the "staircasing" mechanism that applies to Shared Ownership dwellings will be capped so that the proportion of shares an occupier can buy remains below 100% as otherwise an occupier could eventually own their home outright and it becomes a market dwelling.

3.23 Community-led development is defined in the NPPF as a development taken forward by, or with, a not-for-profit organisation, that is primarily for the purpose of meeting the needs of its members or the wider local community, rather than being a primarily commercial enterprise. The organisation should own, manage or steward the development in a manner consistent with its purpose, potentially through a mutually supported arrangement with a registered provider of social housing. The benefits of the development to the community should be clearly defined and consideration given to how those benefits can be protected over time.

Policy HOU4: Sub-division of Dwellings & Houses of Multiple Occupation (HMOs)

Status	Strategic
Priorities	Live Well Locally
Strategic Objectives	1, 2, 9

1. Within the Development Boundaries, proposals involving the subdivision of a larger dwelling (C3 use) into smaller dwellings, and proposals for new Houses of Multiple Occupation (HMOs), will be supported, subject to other Local Plan policies and the following criteria:

    a. All units of accommodation resulting from the subdivision or conversion will provide an acceptable level of amenity for future occupiers in accordance with Policy DEV1 (General Development Considerations);

b. The proposal is appropriate in terms of the impacts on the amenities of occupants of nearby properties;

c. Any alterations or extensions to the host building to facilitate the sub-division or conversion are in accordance with Policy HOU15 (Residential Extensions, Alterations & Outbuildings).

d. Any conversion, alteration or extension works to the host building to facilitate the sub-division shall include measures which will improve energy efficiency and sustainable construction, in accordance with the policies of the Green to the Core chapter;

e. Proposals involving the change of use of a non-residential use to a dwelling or HMO will be determined in accordance with Policy ECO4 (Retention of Sites of Economic or Community Value), as appropriate.

f. All units of accommodation resulting from the subdivision or conversion will comply with the housing standards set out in Local Plan policies and/or licensing requirements (whichever is relevant to the type of development), including in relation to Internal Space Standards and External Residential Amenity Areas including (and not limited to) in terms of provision for car and cycle parking and waste and recycling;

2. Proposals for a new HMO will be required to comply with the following additional criteria:

a. The proposal contributes towards the provision of mixed and balanced communities and does not result in an over-concentration of HMOs in a particular area;

b. Planning applications are accompanied by a detailed management scheme to demonstrate how the HMO will be appropriately managed, having regard to the need to protect the amenity of the local area and of future occupiers. Compliance with an acceptable management scheme will be secured through a planning condition or planning obligation.

Key evidence and/or guidance:

- Rother and Hastings Housing and Economic Development Needs Assessment (HEDNA) (2024) and update (2026)

3.24 This policy supports the creation of smaller units of accommodation in two different ways:

a. Through the sub-division of a larger dwelling into smaller dwellings;

b. Through the creation of a House of Multiple Occupation (HMO).

3.25 The increased need for smaller dwellings is outlined earlier in this chapter. Rother has a relatively sizeable stock of large dwellings, with the proportions of four-plus bedroom properties slightly exceeding the county and national averages (significantly so in many of the rural wards)[60]. Some large dwellings could be appropriately sub-divided to increase the housing stock, both in the towns and villages. The High Weald National Landscape Management Plan[61] identifies that the subdivision of larger homes into smaller ones and the efficient utilisation of the existing building stock and brownfield sites are ways in which the delivery and affordability of housing can be improved while minimising land take, to help deliver housing within the High Weald NL in a manner that can help conserve its character and beauty. Note that this policy relates to land within the development boundaries, the principle of new dwellings in the countryside is addressed through Policy HOU11 (New Dwellings in the Countryside), and the subdivision of existing residential buildings in isolated locations is addressed by the NPPF.

3.26 HMOs are more commonly, but not exclusively, found in the district's urban areas. Affordability issues in the private rental market have resulted in a growing demand for shared or communal living arrangements, such as HMOs, which tend to provide the most affordable accommodation options, particularly for young single households. Planning permission is not usually required to change the use of a single dwelling to a small HMO (up to six residents)[62], although there is currently an "Article 4 Direction" in force in central Bexhill which restricts the conversion of dwellings to HMOs without express planning permission. This is not intended to prohibit such schemes but simply requires their effects to be fully considered through a planning application.

3.27 The policy supports shared accommodation schemes which require planning permission, providing they contribute towards the provision of mixed and balanced communities (and do not result in an over-concentration in a particular area), schemes are well-managed and provide access to appropriate facilities.

[60] The percentage of 4+ bedroom dwellings in Rother in 2021 was 23.4%, compared to a county average of 22.7% and a national average of 21.1%. The proportions vary significantly between Wards in Rother and exceed the district averages in 12 of the 21 Wards. Source: 2021 Census, Office for National Statistics.
[61] HW NL Management Plan 2024-2029: Planning Principle 3
[62] Currently defined as Use Class C4

3.28 What constitutes an over-concentration of HMOs in a particular area will vary depending on the character of the area and the extent to which any potential adverse effects are mitigated. Factors which may be considered include (but are not limited to):

a. the impacts on the streetscape and visual amenity, including through waste and recycling storage,

b. the availability of car parking, including on-street parking in the local area,

c. any likely cumulative impacts arising from increased noise and anti-social behaviour,

d. whether the proposal would result in three or more HMOs being immediately adjacent to each other, and

e. whether the proposal would result in a non-HMO dwelling being sandwiched between two HMOs.

3.29 It should be noted that outside of the planning regime, all HMOs are required to be licensed by the Local Authority[63]. Failure to obtain a license for an HMO is an offence which may be subject to prosecution. Further details on HMO licensing are available on the Council's website. The Councils' Environmental Health team will be consulted on a case-by-case basis on HMO applications.

3.30 In all developments involving sub-division, including HMOs, it will be essential that a good standard of amenity is provided for future occupants, including, for example, in relation to any noise that may be audible between properties. To protect against potential noise and disturbance it will be necessary to consider the internal layout of dwellings as well as any necessary acoustic insulation in accordance with the Building Regulations. All developments will also be required to take the opportunity to improve the energy efficiency and sustainable construction of the host building, in accordance with the policies of the Green to the Core chapter.

[63] Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006 (as amended).

Policy HOU5: Residential Internal Space Standards

Status	Strategic
Priorities	Live Well Locally
Strategic Objectives	2, 9

1. The Council adopts the Government's Nationally Described Space Standard. All new dwellings (including changes of use and houses converted into flats) must provide adequate minimum internal space in line with this standard.

2. All rooms which could potentially be used as a bedroom, including studies and home offices, will be required to meet, as a minimum, the space standard for a single bedroom.

Key evidence and or guidance:

- Rother and Hastings Housing and Economic Development Needs Assessment (HEDNA) (2024) and update (2026)
- Local Plan Viability Assessment (2026)

3.31 The Government's Nationally Described Space Standards (NDSS) set out requirements for the gross internal (floor) area of new dwellings at a defined level of occupancy, as well as floor areas and dimensions for key parts of the home, notably bedrooms, storage and floor to ceiling height. It should be noted that the NDSS represent minimum space standards and that developers are encouraged to exceed them. Larger internal areas may help in meeting the needs of more accessible homes and support home working. Details of the current NDDS can be found at: https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard.

3.32 Research undertaken to support the Rother Development and Site Allocations Local Plan in 2018[64] found that while, at that time, there was a low compliance against every standard, many new dwellings were very close to meeting the standards. It was therefore considered necessary to adopt the NDSS to ensure that new dwellings are built to ensure adequate living accommodation for residents. There is no evidence that adopting the requirement (which the Council did in 2019) has adversely affected the delivery of development or led to notable resistance from developers. Updated viability evidence[65] confirms that a continuing requirement to meet the NDSS will not have any significant impact on viability.

[64] Rother District Council Space Standards Background Paper (October 2018)
[65] Rother Local Plan Viability Assessment (2026)

3.33 The HEDNA (2024) notes that increased levels of homeworking in some sectors may result in an increased desire for dedicated homeworking space within dwellings. It is necessary to ensure that such spaces within dwellings are not ultimately used as a sub-standard bedroom. Consequently, it is appropriate to require all rooms that could potentially be used as a bedroom to meet, as a minimum, the minimum internal space standards for single bedrooms. This applies, for example, to rooms intended for use as a study or home office. This means that the whole dwelling will need to meet the overall internal space standards for the relevant number of rooms that are capable of being turned into bedrooms.

3.34 Note that Policy HOU5 does not apply to Houses of Multiple Occupation (HMOs) because minimum room sizes for HMOs are controlled through the licensing regime in accordance with separate legislation[66].

Policy HOU6: Access Standards

Status	Strategic
Priorities	Live Well Locally
Strategic Objectives	2, 9

1. The Council adopts the Optional Buildings Regulations for Accessible and Adaptable Homes.

2. All new build dwellings are required to meet M4(2): Category 2 - Accessible and Adaptable Dwellings.

3. Additionally, on sites of 20 or more dwellings, 5% of new market housing is required to meet the "wheelchair adaptable dwellings" standard in M4(3)(2)(a) (the provision made must be sufficient to allow simple adaptation of the dwelling to meet the needs of occupants who use wheelchairs).

4. Where there is an identified need on the Housing Register, sites of 20 or more dwellings that provide affordable housing in line with Policy HOU2 are, as part of the affordable housing requirement, expected to provide a minimum of 5% of the total housing requirement to meet the "wheelchair accessible dwellings" standard in M4(3)(2)(b) (the provision made must be sufficient to meet the needs of occupants who use wheelchairs). This may be in lieu of the M4(3)(2)(a) requirement outlined in

[66] The Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions (England) Regulations 2006 (as amended).

criterion (3) where it is demonstrated not to be viable to provide for both requirements.

5. Planning conditions will be imposed to secure the required provision.

6. Only in circumstances where it can be robustly demonstrated by the applicant that it is not practicable or financially viable to deliver the provisions above or where the requirements are clearly incompatible with conserving and enhancing historic character, will new development be exempt from any of these policy requirements. Where only certain elements of the standard(s) cannot practically or viably be achieved, the remainder of the requirements of the standard(s) will still be expected to be provided.

Key evidence and/or guidance:

- Rother and Hastings Housing and Economic Development Needs Assessment (HEDNA) (2024) and update (2026)
- Rother District Council Housing Register
- Local Plan Viability Assessment (2026)

3.35 The Government has introduced, through amendments to the Building Act 1984, a three-tier standard for accessibility[67] in Part M of Schedule 1 of the Building Regulations (Access to and Use of Buildings), involving a mandatory baseline (i.e. minimum) requirement and two optional standards:

a. Mandatory baseline - M4(1) – visitable dwellings.

b. Optional Standard - M4(2) – accessible and adaptable dwellings.

c. Optional Standard - M4(3) – wheelchair user dwellings. This standard is further divided into M4(3)(2)(a) - wheelchair adaptable dwellings, and M4(3)(2)(b) – wheelchair accessible dwellings.

3.36 It is for Local Planning Authorities to demonstrate whether there is a need for developments in their area to meet the optional standards (M4(2) and M4(3)), with reference to their housing needs assessment and other available datasets.

3.37 Significant numbers of Rother's population are affected by a long-term health problem or disability, a proportion which increases as the population ages, affecting 55% of people

[67] Note that currently, in relation to dwellings, the Building Regulations requirements relate only to newly built dwellings and not changes of use of existing buildings to dwellings.

aged 75-84 and 80% of people aged 85+.[68] Nationally, around 20% of households whose accommodation needs are affected by disability require adaptations to make their accommodation suitable, and the proportion of wheelchair users in the social rented sector is significantly higher than that in owner occupied or private rented households.[69] The continued ageing of Rother's population, together with general population growth over the Plan period, will increase the number of households requiring home adaptations or a suitable accessible property. This includes a proportion of households who will require housing suitable for a wheelchair user.

3.38 In addition to the impacts of physical disabilities and poor health on accessibility requirements, the housing needs of people with dementia should also be considered. At the national level it is estimated that around 7% of older people live with dementia.[70] The Alzheimer's Society[71] strongly recommends the Optional Standards of M4(2) and M4(3) are considered in the design of all built environments in order to ensure buildings are accessible for people with dementia, as well as other conditions.

3.39 The requirements for all new dwellings in the district to be M4(2) compliant, and a proportion of affordable dwellings to meet M4(3) standards where a need exists on the housing register, were introduced in Rother through the Local Plan in 2019 and there is no evidence these requirements have adversely affected delivery. On sites of 20 dwellings or more, Policy HOU8 additionally includes a requirement for 5% of new market housing to meet the "wheelchair adaptable dwellings" standard in Part M4(3)(2)(a). These policy expectations are justified by the district's ageing population and levels of disability, and the need for homes to appropriately meet the demands of occupiers throughout their lifetimes.

3.40 Only in circumstances where it can be robustly justified by the applicant that any part of the standards cannot be viably or practically achieved on a site, will a relaxation of the requirements be permitted. In cases where it is demonstrated that certain requirements of the standard(s) cannot be achieved (for example, the installation of a lift in flat conversions) but the remainder of the requirements are achievable (for example, approaches, routes, window levels, etc), developments will be required to comply with all parts of the standard(s) that can be practically and viably achieved.

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[68] Census, 2011, Office for National Statistics, referenced in the HEDNA (2024)
[69] The English Housing Survey (EHS) (2019-2020), referenced in the HEDNA (2024)
[70] Dementia and Town Planning, RTPI Practice Advice, Royal Town Planning Institute (2020)
[71] Dementia-friendly Housing Guide, Alzheimer's Society (2020)

Policy HOU7: Specialist Housing for Older People

Status	Strategic
Priorities	Live Well Locally
Strategic Objectives	2, 9

1. Schemes comprising of specialist housing for older people[72] will be supported on suitable sites in sustainable locations with good access to public transport and local facilities, subject to compliance with other Local Plan policies.

2. In exceptional circumstances where provision cannot be met within development boundaries, planning permission may be granted for schemes comprising of specialist housing for older people outside development boundaries in order to meet an identified local need for such housing in rural areas. Any such proposal must be well related to an existing settlement and its services including access to public transport, must safeguard intrinsic and distinctive landscape character, paying particular regard to the conservation of the High Weald National Landscape, and must meet other local planning criteria.

3. Schemes providing extra-care housing or housing with care will usually be prioritised over retirement living, sheltered accommodation or age-restricted general market housing[73], unless it is demonstrated that the site is unsuitable for an extra-care or housing with care scheme, or that there is an identified need for the proposed accommodation type in that location.

4. The provisions of Policy HOU2 (Affordable Housing) will apply to all schemes meeting the size thresholds set out in the policy, at the proportions set out in that policy. Affordable housing shall be provided either as on-site provision or where this is shown not to be practical, as an equivalent financial contribution for off-site provision.

Key evidence and or guidance:

- Rother and Hastings Housing and Economic Development Needs Assessment (2024) and Update (2026)
- Local Plan Viability Assessment (2026)

3.41 Rother's population profile is heavily weighted to the older end of the age spectrum. While nationally, the population is ageing, this trend is particularly acute in Rother. To ensure its older population is appropriately considered, the District Council has become a member of the World Health Organisations' Global Network for Age-friendly Cities

[72] Specialist housing for older people is defined in the Planning Practice Guidance but for the purposes of this policy it excludes residential care homes and nursing homes, which are addressed separately through Policy HOU8.

[73] All as defined in the Planning Practice Guidance

and Communities, which is committed to supporting the full participation of older people in community life and the promotion of healthy and active ageing.

3.42 The access standards for all new dwellings required through Policy HOU6 (Access Standards) will serve to enable many older occupants to move into a suitable, new general needs dwelling. Specialist housing for older people will create additional provision, which will have resulting benefits to the supply of family housing, as some older households will choose to move from a house they may be under-occupying.

3.43 The health and lifestyles of older people will differ greatly, as will their housing needs. The PPG provides indicative definitions for the different types of specialist housing designed to meet the needs of older people. Note that this policy does not apply to residential care homes or nursing homes, which are considered separately through Policy HOU8 (Residential Care & Nursing Homes)

a. Age-restricted general market housing: This type of housing is generally for people aged 55 and over and the active elderly. It may include some shared amenities such as communal gardens but does not include support or care services.

b. Retirement living or sheltered housing: This usually consists of purpose-built flats or bungalows with limited communal facilities such as a lounge, laundry room and guest room. It does not generally provide care services but provides some support to enable residents to live independently. This can include 24-hour on-site assistance (alarm) and a warden or house manager.

c. Extra care housing or housing-with-care: This usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available if required, through an onsite care agency registered through the Care Quality Commission (CQC). Residents are able to live independently with 24-hour access to support services and staff, and meals are also available. There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are known as retirement communities or villages - the intention is for residents to benefit from varying levels of care as time progresses.

3.44 Evidence[74] identifies a need for all forms of older person's accommodation in Rother over the Plan period, but a particular need for extra-care housing or housing with care in the

[74] HEDNA (2024)

market sector (which currently has very low/ no provision in Rother). There is less need for additional retirement living or sheltered housing or age-restricted general housing, due to the existing level of provision, although a need for additional social rented accommodation in these categories is identified.

3.45 Specialist housing for older people should be focused within the development boundaries, in locations with good access to local amenities and green space within easy and safe walking distances. However, the difficulties in delivering specialist schemes, including in terms of viability and minimum site size are recognised, and therefore, the policy also allows for appropriate schemes outside development boundaries in exceptional circumstances, where sites are unavailable within development boundaries. This policy provision is intended to assist with scheme delivery in situations where there is a particular need for specialist housing for older people in a rural area, but where schemes cannot compete with general needs housing due to their differing development and operational models.

3.46 In all cases, including for sites outside the development boundary, proposals will need to demonstrate their "walkability" to services and public transport in their siting. Schemes will also be required to comply with the HAPPI principles[75] or similar design standards appropriate to housing for older people.

3.47 Affordable housing is required as part of all qualifying developments in accordance with Policy HOU2, ideally as on-site provision. It is, however, acknowledged that due to the differences between the development models of specialist housing for older people compared to general needs housing, off-site affordable housing provision or a financial contribution may sometimes be more appropriate and more easily achieved.

Policy HOU8: Residential Care & Nursing Homes

Status	Strategic
Priorities	Live Well Locally
Strategic Objectives	2, 9
1. New residential care and nursing homes (including homes for looked-after children) will be supported on suitable sites in sustainable locations within the Development	

[75] The recommendations of the Housing our Ageing Population Panel for Innovation (HAPPI) Report (2009) and the additional ten rural-proofed HAPPI features set out in HAPPI 4 (April 2018)

Boundaries, with good access to public transport and local facilities, including healthcare facilities.

2. Proposals to alter or extend existing residential care and nursing homes will be supported, subject to other Local Plan policies, where the alterations or extensions will result in a better standard of care provision or are required to meet current relevant standards[76].

3. Proposals involving the loss of a residential care or nursing home (or a site last in such use), including through a change of use, will be resisted unless:

    i. It is demonstrated that sufficient provision of the equivalent or better quality is available in the local area; or

    ii. It is demonstrated that alternative provision of the equivalent or better quality will be provided in the local area and made available prior to the commencement or redevelopment of the proposed scheme; or

    iii. The proposal is supported by evidence that demonstrates the accommodation no longer meets minimum standards required to provide acceptable care and it is not practicable or viable to improve the accommodation to minimum standards or adapt for alternative specialist accommodation.

Key evidence and or guidance:

- Rother and Hastings Rother and Hastings Housing and Economic Development Needs Assessment (HEDNA) (2024) and update (2026)

3.48 This policy applies to residential care and nursing homes for all ages, including homes for looked-after children.

3.49 Across East Sussex, the proportion of residents living in care homes (1.06% of the population) exceeds the average for England (0.57%), with Rother slightly exceeding the county average. However, the number of residents living in care homes across East Sussex has reduced since 2011, by 15.9%. Evidence[77] finds some uncertainty in terms of likely future needs for residential care home accommodation in the district. Therefore, the policy provides in principle support for "windfall" developments that come forward within the development boundaries, as well as suitable extensions or alterations to existing facilities.

[76] Relevant standards include those set by the Care Quality Commission or Building Regulations, for example.
[77] HEDNA (2024)

3.50 There is also a requirement in national policy to consider the needs of looked-after children. Evidence[78] shows that most looked-after children in Rother are accommodated through foster care (and therefore within the general housing stock), although there remains a smaller but nevertheless important requirement for children's homes, supported accommodation and other specialist provision. This policy therefore provides a supportive approach towards enabling appropriate accommodation of all scales to come forward.

3.51 At the same time, it is acknowledged that over the Plan period there are likely to be some closures of existing care homes, as older properties become outdated (for example those with shared bedrooms or shared washing facilities) and cannot viably be brought up to the required standards. Consequently, the change of use of care homes will be accepted where this is justified either through there being sufficient provision already available in the local area (i.e. an "oversupply" of care homes); or where alternative appropriate provision is to be provided (i.e. a replacement facility), or where the accommodation cannot practicably or viably meet modern standards. Planning applications which seek to demonstrate compliance with one or more of these provisions will need to be accompanied by supporting evidence and documentation which will be subject to consultation with ESCC's Adult Services department and other relevant bodies.

3.52 The meaning of "local area" for the purposes of assessment under part (i) of the policy will, to an extent, be dependent on the characteristics of the existing facility and of the area in which it is located, and advice will be sought from ESCC on a case-by-case basis. For example, for a standard residential care home for older people in Bexhill it may be reasonable to consider a radius of a few kilometres from the site, but for a more specialist care home that serves a wider area, the radius may need to be larger. Residential care homes in villages and elsewhere in the rural area should consider any equivalent facilities within the same village or parish unless a wider radius can be robustly justified. Seeking to retain facilities within villages and rural clusters accords with the Live Well Locally objectives of the Plan.

3.53 In most cases where a change of use of a care home is sought, the proposed use is likely to be residential, which, where justified, would assist in boosting local housing supply. Careful consideration will be necessary for proposals outside development boundaries, and changes of use to residential will be considered in accordance with Policy HOU11

[78] HEDNA Update (2026)

(New Dwellings in the Countryside). Proposed changes to other uses (for example, tourism, business) will be considered in accordance with other Plan policies.

3.54 It should be noted that because this policy sets out its own tests for proposals involving the loss of a care or nursing home, the tests within Policy ECO4 (Retention of Sites of Economic or Community Value), do not apply. Similarly, Policy HWB3 (Healthcare & Other Community Facilities & Services) does not apply to proposals involving care and nursing homes.

Policy HOU9: Gypsies, Travellers & Travelling Showpeople

Status	Strategic
Priorities	Live Well Locally, Green to the Core
Strategic Objectives	2, 3

Development proposals for new Gypsy, Traveller and Travelling Showpeople sites, and extensions, alterations and intensifications of existing sites, will be supported when all of the following criteria are met:

1. It contributes to meeting both current and projected needs for gypsy, traveller or travelling showpeople accommodation, as demonstrated in the most up-to-date Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment;

2. The site is of a small scale (circa maximum ten pitches/ plots) and is not disproportionate in scale to the nearest settlement;

3. It safeguards intrinsic and distinctive landscape character, paying particular regard to the conservation of the High Weald National Landscape in accordance with other Plan policies, including through restricting any permanent built structures and external lighting in rural locations to what is essential;

4. On sites containing multiple pitches/ plots it is demonstrated that as far as possible, built development such as hardstanding, parking areas and structures are shared between pitches, to minimise landscape impacts;

5. Other than for transit sites, the site is within or close to an existing settlement, from which residents can access education, health, welfare and employment infrastructure;

6. It is capable of being satisfactorily provided with necessary infrastructure such as power, water supply, foul water drainage and waste/recycling management;

7. It does not cause unacceptable harm to the amenities of neighbouring uses and occupiers; and is not subject to unacceptable harm to amenity from neighbouring uses;

8. In the case of sites for Travelling Showpeople, the site is also suitable for the storage of large items of mobile equipment;

9. In the case of transit sites, the site is located close to or within easy access of the strategic road network;

10. In the case of transit sites, the proposal is accompanied by a management plan which demonstrates how the site will be appropriately managed in perpetuity to ensure the amenity of its occupants and the local community is protected.

11. Where planning permission is granted, appropriate conditions or planning obligations will be imposed to ensure occupation of the site is restricted to those persons falling into the definition of Gypsies, Travellers and Travelling Showpeople[79].

Key evidence and or guidance:

- East Sussex Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (2022)

3.55 This policy relates to both permanent and transit sites for gypsies and travellers, and also travelling showpeople, as defined in national planning policy.

3.56 Identifying land for new gypsy, traveller and travelling showpeople (GTTSP) sites can be challenging. The East Sussex Gypsy and Traveller Accommodation Assessment (GTAA) (2022) notes that a key barrier to delivering new sites cited by stakeholders is a lack of suitable, affordable land, due to significant environmental and other constraints and the low residential land values generated by planning permission for gypsy and traveller sites, compared to conventional housing. Landowners face lower returns than for conventional housing and consequently, responsibility for delivering new provision usually falls to the GTTSP community or local authorities. Furthermore, many existing sites are occupied by single or extended families and are therefore unavailable for unrelated households.

3.57 These viability factors can result in demand for private GTTSP sites outside Development Boundaries where values are lower, and as such, an exceptions site approach to

[79] As defined in national planning policy.

considering sites is adopted, allowing for sites within or close to existing settlements, subject to compliance with other Plan policies. Sites will need to be located to enable access to education, welfare and health services, ideally by active travel or public transport. Where a site is otherwise suitable but lacks these sustainable connections and there is no alternative preferable site, access via a short (circa 5 minutes) private car journey may be accepted. While this is a more permissive approach compared to the approach taken for general needs housing, it is justified due to the significant difficulties in identifying land for traveller sites.

3.58 A limit on the size of new or extended sites, to a maximum of circa ten pitches or plots in total, is defined, although experience shows that most sites coming forward in the district are far smaller than this. The GTAA (2022) found that small sites of this scale are preferred by gypsy and traveller communities due to their perceived better management. Sites of this scale are also preferred by the County Council's Gypsy and Traveller Liaison Team. Multiple pitches on a single site often accommodate an extended family.

3.59 The GTAA suggests as a general guide, a family pitch should be capable of accommodating: an amenity building, a large static caravan or chalet and a touring caravan on hard-standings, parking space for two vehicles, a hard-standing for a storage shed and a small garden area. The minimum land area necessary for a single pitch is estimated at 325sqm although a larger pitch of at least 500sqm (0.05ha) would more comfortably accommodate necessary facilities. Plots for travelling showpeople are necessarily larger due to the need to accommodate both living space and storage and maintenance space for large equipment.

Policy HOU10: Self-Build & Custom Housebuilding

Status	Strategic
Priorities	Live Well Locally
Strategic Objectives	2

1. The Council will support Self and Custom Housebuilding projects, including community-led projects, subject to compliance with other relevant Local Plan policies.

2. On all housing developments of 20 or more dwellings, at least 5% of the total number of dwellings to be provided should be made available as serviced plots for self or custom housebuilders and will be secured by planning obligation.

3. Plots should be made available at a demonstrably comparable market rate for the local area and marketed through relevant marketing agencies for a period of at least 12 months. If the plots are not sold within this time period, they may be released for conventional market housing in line with the terms set out in the relevant planning obligation.

4. Where appropriate, the Council will seek to ensure that self/custom build homes are developed in accordance with an agreed design code. Proposals will also need to demonstrate the plot(s) have a suitable layout and design to enable them to be delivered and make optimum use of land. Planning conditions may be used to ensure appropriate phasing of development.

5. The requirements of this policy do not apply where the site or proposed development:

    a. Provides solely for Build to Rent homes;

    b. Provides solely or predominately specialist accommodation for a group of people with specific needs (such as purpose-built accommodation for the elderly);

    c. Is exclusively for affordable housing, a community-led development exception site or a rural exception site;

    d. Consists solely of the re-use or conversion of vacant buildings; or

    e. Consists solely of flats.

6. The above exclusions do not preclude self and custom build housing being included on such schemes if proposed.
Key evidence and or guidance: • Rother District Council Self-Build and Custom Housebuilding Headline Data Report (2025) • Local Plan Viability Assessment (2026)

3.60 Self-Build and Custom-Build Housing (SCHB) covers a wide spectrum, from projects where individuals are involved in building or managing the construction of their home from beginning to end, to projects where individuals commission their home, making key design and layout decisions, but the home is built ready for occupation ('turnkey'). A key consideration in determining whether a home is self-build or custom build is whether the initial owner of the home will have primary input into its final design and layout[80]. Some community-led projects can also be defined as self-build. These can offer a form of housing which is generally more affordable and complements the supply of mainstream housing.

3.61 Neither policy or legislation separately defines self-build and custom housebuilding. Planning guidance published by the Right-to-Build Taskforce[81] outlines the differences:

a. Self-build: A self-build home is one built to the plans or specifications of the occupant on a single plot.

b. Custom-build: A custom build home is built to the plans or specifications of the occupant on a multi-plot site which is actively managed by a third-party enabler. There are two main variants:

i. Serviced Plot Model. The occupier purchases a serviced plot of land with planning permission to construct a new home designed within a set of pre-agreed parameters, often facilitated by a Design Code or similar design guide; and

ii. Customisable Homes. The occupier customises a new pre-designed home, on a serviced plot. A design and build contract for the construction will often be in place, with customer choice actively promoted as a positive part of the

[80] Source: Planning Practice Guidance

[81] Right to Build Task Force Custom and Self-Build Planning Guidance PG1: Defining self-build and custom housebuilding (March 2021: Version 2.0) Available at www.righttobuild.org.uk

build process. Design choices are managed by a clearly defined menu of choices, with enough flexibility to enable the occupier to customise their home to suit their needs (customisation extends beyond second fix items such as kitchens and bathrooms). Homes are often customisable in the following ways:

- Choice of plot and house type - these can include detached, semi-detached, terraces and apartments.
- Choice of exterior materials and the scope to make minor amendments to add extras such as balconies or car ports (where permissible).
- Choice of interior layouts.
- Choice of interior fit out/specification.

3.62 Legislation[82] places a duty on councils to keep a Register of people and organisations interested in self-build or custom build projects in their area and have regard to it in planning for such projects. Councils must also give suitable development permission to enough suitable serviced plots of land to meet the demand for self-build and custom housebuilding in their area. Data from Rother's Register shows that the most popular locations for a SCHB plot are the rural areas outside the main towns, and that most people would prefer a 3–4-bedroom detached house or bungalow on an individual plot[83]. It is expected that these interests will largely be met by the market. A sizeable proportion of the current demand is currently met by individuals identifying their own plot through the demolition and re-build of an existing dwelling and certifying the development as a self-build project. However, just over a quarter of individuals indicated they may also be interested in a plot on a site with a group of other self/ custom builders.

3.63 To address the overall likely demand for self and custom build plots, the policy provides in-principle support for SCHB (including community-led) projects, subject to compliance with other relevant Local Plan policies. This includes, where relevant, the Council's housing mix and affordable housing requirements set out under Policies HOU1 (Mixed & Balanced Communities) and HOU2 (Affordable Housing). The policy also requires, on development sites of 20 or more dwellings, for at least 5% of the total number of

[82] The Self-build and Custom Housebuilding (SCHB) Act 2015

[83] Source: Rother District Council Self-Build and Custom Housebuilding Headline Data Report 2025

dwellings to be made available as serviced plots for self and custom housebuilders[84]. On these sites, the location of the SCHB plots should be indicated on an overall site layout plan but full details of the SCHB dwellings (elevations, internal and external layout, landscaping, etc) will be for approval through a further planning permission once the future occupier has chosen these details. Local evidence suggests that to date, the preference of developers of larger sites is to provide plots for "customisable homes" within the definition of custom-build housing. Self-build and "serviced plot" style custom-build homes appear more likely to be delivered on smaller sites. As noted above, both meet the definition of SCHB.

3.64 SCHB could also take the form of affordable housing supported through Policy HOU3 (Rural Exception Sites). SCHB proposed outside development boundaries will be determined in accordance with Policy HOU11 (New Dwellings in the Countryside).

3.65 The policy lists a number of exclusions from the requirements of the policy, such as developments consisting wholly of flats. These are justified due to the difficulties in providing custom-build flats but also the very low demand for this property type from entrants on the Council's SCHB register. This will not affect overall delivery of SCHB plots because there is no history of their provision on these sites in any event.

3.66 To ensure that self and custom housebuilding is of a high-quality design, attention is drawn to the requirements of the Live Well Locally policies. On sites with multiple serviced plots, it may be appropriate for the applicant to support their application with a Design Code. A Design Code would be prepared by the plot provider at the outline planning stage and should provide the Council as well as potential self and custom housebuilders with a clear set of design rules and parameters that future development will have to comply with. Design Codes will vary depending on the amount of development proposed and the context of the site.

[84] The policy will be implemented on a "whole plot" basis, applying to every 20th dwelling in a scheme. For example, a scheme of 20-39 dwellings will require one plot, a scheme of 40-59 dwellings will require two plots, a scheme of 60-79 dwellings will require three plots, etc.

Policy HOU11: New Dwellings in the Countryside

Status	Strategic
Priorities	Live Well Locally
Strategic Objectives	2, 3

1. New dwellings in the countryside (as defined by being outside of a development boundary as defined on the Policies Map) will be allowed in very limited circumstances, including:

    a. Dwellings to support farming and other land-based industries, in accordance with Policy HOU12 (Dwellings for Rural Workers);

    b. The conversion of a historic building in accordance with Policy HER2 (Conversion & Re-use of Historic Buildings), or other heritage assets, where the development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of the heritage asset;

    c. The one-to-one replacement of an existing dwelling of similar landscape impact;

    d. As a 'rural exception site' to meet an identified local affordable housing need in accordance with Policy HOU3 (Rural Exception Sites & Community-led Development);

    e. As a site for specialist housing for older people, where allowed for to meet an identified need in accordance with Policy HOU7 (Specialist Housing for Older People);

    f. The conversion of an existing redundant or disused building which is capable of conversion without significant extension, where justified in accordance with other relevant Local Plan policies, where the proposal enhances its immediate setting and where the site accords with policies within the Live Well Locally chapter;

    g. Very small-scale development of single, pairs or small terraces of 3-4 dwellings (maximum), either within a settlement without a development boundary or adjacent to an existing development boundary where all the following criteria are met:

        i. the site is adjacent to the edge of an otherwise built-up frontage; and

        ii. the site accords with policies within the Live Well Locally chapter; and

iii. where the siting, scale and design of the development would support and not detract from the historic settlement pattern and character of the locality; and

iv. where the location of the development would not extend beyond any highly legible visual and landscape termination to the existing settlement; and

v. where the location of the development would not result in the coalescence of distinct settlements; and

vi. where the development would not infill important green gaps through which the High Weald National Landscape is glimpsed and appreciated.

vii. In all cases the proposal must safeguard the intrinsic and distinctive landscape character and scenic beauty of the countryside and pay particular regard to the conservation of the High Weald National Landscape (where relevant), other environmental designations and the historic environment.

viii. To prevent the inappropriate extension of settlements, proposals adjacent to a site which has previously been developed under this provision will not usually be permitted.

ix. To provide for local rural housing need, all new dwellings in the countryside which are permitted under this criterion (g) shall be subject to a restriction, secured by a planning condition or obligation, which limits their occupation to that of a principal residence and prevents their future use as a second home or holiday accommodation. Proposals to change the use of existing lawful holiday accommodation in the countryside to a dwelling will be considered under Policies ECO7 and ECO8.

Key evidence and or guidance:

- High Weald AONB Management Plan 2024-2029
- High Weald AONB Housing Design Guide 2019

3.67 Policy SS2 (Development Boundaries) sets out the proposed Local Plan strategy of focusing development within the defined development boundaries of the towns and villages. In the context of Policy HOU11 (New Dwellings in the Countryside), land outside the development boundaries is considered to be the countryside, where new development is strictly controlled. However, it is recognised that in some cases it may be appropriate to allow new dwellings outside the development boundaries.

3.68 The policy does not seek to duplicate or contradict the provisions in national planning policy for isolated homes in the countryside but should be read in addition to it, and is

relevant to all proposals for dwellings outside development boundaries, not only those in isolated locations.

3.69 New dwellings may be essential in the countryside, including potentially in isolated locations, for the proper functioning of land-based businesses (i.e. agriculture, forestry and equine-related activities). This is covered in detail in Policy HOU12 (Dwellings for Rural Workers).

3.70 The approach to the conversion and re-use of historic buildings for residential use is discussed through Policy HER2(Conversion & Re-use of Historic Buildings). National planning policy also allows for other "heritage assets", permitting their conversion to residential use in isolated locations subject to criteria. This could also be appropriate in other (non-isolated) countryside locations and is allowed for through Policy HOU11.

3.71 Replacement dwellings in the countryside should not increase the visual prominence of the building in the countryside nor detract from the rural landscape character and local context of the area and should take every opportunity to improve any existing adverse landscape impact.

3.72 The policy also allows for the re-use of buildings which are truly redundant or disused, where this is justified in accordance with other Local Plan policies, and the site accords with policies in the Live Well Locally chapter. Such buildings should be capable of conversion without significant extension, and applications will be required to be accompanied by a structural survey to determine the condition of the existing building. Note this is separate to the support provided by the NPPF for such proposals in isolated rural locations. For example, proposals involving former community uses will be required to comply with Policies HWB3 and ECO4, former tourism uses will be required to comply with Policies ECO5 and ECO4, former economic uses will be required to comply with Policy ECO2 and ECO4, and proposals involving former residential care homes or nursing homes will be required to comply with Policy HOU8.

3.73 Limited residential development in smaller settlements can help support local services and enhance or maintain the vitality of rural communities. Therefore, Policy HOU11 (g) allows for the development of small numbers of dwellings adjacent to an otherwise built-up frontage, where strict criteria are met. Given the need for smaller dwellings throughout Rother and particularly in the rural areas, dwellings of 1-3 bedrooms will be prioritised, and any proposals involving larger dwellings under this criterion should be justified. To prevent new car-reliant development in unsustainable locations, such sites

should accord with policies within the Live Well Locally chapter including in terms of being close and accessible to local services and public transport connections.

3.74 To ensure that additional dwellings in the countryside permitted under criterion (vii) contribute to meeting local housing needs, it is necessary to restrict their occupation to use as a principal residence and to prevent their future use as a second home or as holiday accommodation. This will be implemented through a condition or planning obligation attached to the planning permission. It will not prevent the property being rented out on a long-term basis, providing it is the occupant's principal residence. While the important contribution that tourism makes to the local economy is recognised, and tourism accommodation is supported through Policy ECO5, Rother has a significantly higher concentration of 'holiday homes' than other parts of the South-East, indeed, among all 309 lower tier/unitary authority areas within England, Rother ranked the 19th highest[85]. Areas where the concentration is particularly high include many of the rural parishes, particularly in the eastern part of the district.[86] The use of dwellings as second homes or short-term lets (e.g. "Airbnbs") in this way, has the effect of reducing the housing supply and driving up the cost of housing[87] and consequently, where additional housing is exceptionally permitted outside development boundaries under Policy HOU11 (g), it is appropriate to limit its use to a principal residence, as detailed.

3.75 This requirement does not mean that proposals to change the use of existing holiday accommodation in the countryside to residential use will be supported. Indeed, such proposals are generally resisted under Policies ECO4 and ECO5 in order to protect the existing supply of tourist accommodation in support of the local economy.

Policy HOU12: Dwellings for Rural Workers

Status	Strategic
Priorities	Live Well Locally, Thriving Local Economy
Strategic Objectives	2, 3

[85] Source: Census (2021), Office for National Statistics. Rother has 13.1 holiday homes per 1000 dwellings compared to an average of 3.0 across the South East and 2.4 across England.
[86] Source: Census (2021), Office for National Statistics
[87] Rother Housing, Homelessness and Rough Sleeping Strategy 2019-2024 and Action Plan Update (November 2020)

1. New dwellings to support farming and other land-based industries will be allowed in the countryside (as defined by being outside of a development boundary) where all of the following criteria are met:

    a. The application demonstrates a clearly established functional need, relating to a full-time worker primarily employed in the farming and/or other land-based businesses. It must be demonstrated that the nature and demand of the work concerned make it essential for someone to live at, or very close to, their workplace.;

    b. The application demonstrates the functional need cannot be fulfilled by other existing accommodation in the area;

    c. The application demonstrates the unit and the agricultural/ land-based activity concerned are financially sound and have a clear prospect of remaining so;

    d. Dwellings are of appropriate size, siting and design.

2. Normally, accommodation will initially be permitted on a temporary basis for a period of three years in relation to a new rural enterprise. Both temporary and permanent dwellings will be subject to appropriate occupancy conditions.

3. Proposals to remove an agricultural/ land-based work occupancy condition will only be permitted where it is demonstrated that:

    a. There is unlikely to be any need for such rural worker dwellings at the site or within the local area, as demonstrated by an up-to-date assessment of the demand for land-based worker dwellings; and

    b. Robust and comprehensive evidence has been provided to demonstrate that the property has been subject to continuous marketing for an 18-month period at either a rental or sale price that reflects the occupancy condition in place. Such proposals will be independently verified at the applicant's expense.

Key evidence and or guidance:

- High Weald AONB Management Plan 2024-2029
- High Weald AONB Housing Design Guide 2019

3.76 Dwellings may be essential in the countryside for the proper functioning of land-based businesses (e.g. agriculture, forestry and equine-related activities), and this is allowed for under Policy HOU11. Policy HOU12 sets out further details of how proposals for new dwellings, and proposals to change existing occupancy conditions, will be considered.

3.77 Businesses will be required to be demonstrably 'financially sound', which normally means that, for dwellings necessary to support new businesses, permissions will initially be granted on a temporary basis, for a caravan or similar temporary residential structure.

3.78 Permanent dwellings will normally require the agricultural unit and activity to have been established for at least three years, have been profitable for at least one of them, be currently financially sound and have a clear prospect of remaining so. Applications will need to be accompanied by evidence to demonstrate this, which will be subject to independent review. Careful consideration should also be given to the siting, size and design of dwellings for land-based workers to ensure they remain affordable for rural workers. The siting of new dwellings should be well-related to existing farm buildings or other dwellings, wherever practicable.

3.79 To ensure that a dwelling remains available to meet the recognised need, occupancy conditions will be applied. Permission will only be granted for the removal of an occupancy condition where strict criteria are met, as detailed in the policy, in order to ensure the retention of needed housing for land-based workers.

Policy HOU13: External Residential Amenity Areas

Status	Strategic
Priorities	Live Well Locally
Strategic Objectives	2, 9

1. An integrated approach to the provision, layout and treatment of external areas of dwellings should be considered from the outset of the design process, with specific regard to the following:

    a. Private External Space: Appropriate and proportionate levels of private, usable, external space will be expected, having regard to the type, size and likely occupancy of the dwelling, the site context and the overall quality of the development.

    b. For new houses, private rear garden spaces of at least 10 metres (m) in depth will normally be required. A lesser depth may be acceptable where justified by the dwelling type, site layout, local character, heritage considerations or other site-specific circumstances, providing the space remains genuinely usable and the design secures satisfactory privacy, outlook, daylight and sunlight.

c. New build flats and maisonettes will usually be required to provide a minimum of 3 square metres (sqm) of private external amenity space per dwelling.

d. The siting and design of car parking, Electric Vehicle (EV) charging points, cycle storage, and storage for any other large items[88] should be appropriate to the location, layout and design approach of the development, must not compromise the usability or quality of private or communal amenity space, and must accord with Policy LWL8 (Multimodal Parking, Services & Deliveries). Cycle storage must be safe, secure and conveniently located for the occupiers.

e. Waste and Recycling: Sufficient bin storage and collection points must be provided. Their siting and design should be integral to the development, avoid harm to the visual amenity and streetscape character of the development and surrounding area, and be fully accessible for collection. Storage and collection arrangements must not obstruct pedestrian, wheeling or cycling routes or unacceptably reduce the usability of external amenity space.

Key evidence and or guidance:

- Rother District Council Density Study Update (2026)
- National design guidance (including the National Design Guide (2021), National Model Design Code and successor Design and Placemaking Planning Practice Guidance)
- Building for a Healthy Life (2026)
- High Weald AONB Housing Design Guide (2019)
- Relevant Council waste and recycling collection guidance

3.80 All new residential development, including new-builds, conversions, and dwellings arising from a change of use, must be capable of accommodating the reasonable expectations of likely occupiers in accordance with Policy DEV1 (General Development Considerations). This applies to the external areas of dwellings, which should provide sufficient and genuinely usable outdoor amenity space while also accommodating practical needs, such as drying clothes, storage and refuse/recycling facilities. Parking, cycle storage and electric vehicle charging are addressed by Policy LWL8 (Multimodal Parking, Services & Deliveries).

3.81 The provision, layout and treatment of external areas should be seen as an integral part of the wider design approach to residential developments, which respects the character of its setting, whether urban or rural, and makes a positive contribution to reinforcing

[88] Examples of large items include wheelchairs, mobility scooters and children's buggies, which may require storage depending on the likely occupiers of the development and whether such needs can be appropriately met within the dwelling.

local distinctiveness. "Building for a Healthy Life"[89] sets out a range of considerations including relating to external amenity areas. Policy LWL5 implements these requirements in the local context.

3.82 Gardens should be of an appropriate size to provide sufficient, useable amenity space. The calculation of external amenity space should exclude footpaths, driveways, and areas for vehicle circulation and parking. For houses, this will normally mean a minimum rear garden depth of 10 metres. The 10-metre depth is a benchmark for conventional housing layouts rather than an absolute requirement. A garden of lesser depth may be acceptable where it remains of sufficient area and dimensions to be genuinely usable, and the overall design secures satisfactory privacy, outlook, daylight and sunlight. Relevant considerations may include the dwelling type and likely occupancy, local character, site constraints, the provision of usable private space elsewhere within the plot and the quality of any communal amenity space. Garden depth should not be relied upon as the sole means of achieving privacy or satisfactory separation between dwellings. These matters should be addressed through the integrated design of building position, orientation, windows, boundaries and landscaping.

3.83 A number of considerations may affect garden size, including the relationship with adjacent properties and land uses. Where usability of external space would be constrained by factors such as sloping ground, poor orientation, large trees, noise, flood risk or other environmental conditions, a larger or differently configured space may be necessary. A larger garden may also be appropriate where this is required to respond to a strong and well-established spacious character. Overlooking towards and from neighbouring properties must also be considered.

3.84 In relation to new-build flatted developments and maisonettes, private amenity space should usually be provided at a ratio of at least 3sqm per dwelling unless there are demonstrable reasons why this is not achievable or appropriate. This could take the form of a balcony, terrace and/or private garden (including a roof garden). Balconies and terraces must have a minimum depth of 1.5m and sufficient width and overall area to accommodate seating appropriate to the size and likely occupancy of the dwelling. They should also provide acceptable privacy, outlook and environmental conditions. It is accepted that equivalent amounts of private amenity space may not always be achievable for new flats or maisonettes that are created through the conversion of an existing

[89] Building for a Healthy Life: A Design Toolkit for Neighbourhoods, Streets, Homes and Public Spaces. Homes England (2026).

building. In these cases, the availability of usable communal amenity space and accessible nearby public open space may form part of the overall assessment. Any failure to meet these minimum thresholds will need to be clearly justified, and alternative proposals for ensuring that the proposal will reasonably meet the daily needs of the occupiers will need to be provided.

3.85 The proximity, accessibility, size and quality of existing (or proposed) public open space and recreational land may also be a consideration in the overall delivery and requirements for external amenity areas within a new development. Public open space complements but does not normally provide a direct substitute for private or communal residential amenity space. Its proximity, accessibility and quality may nevertheless form part of the overall assessment, particularly for conversions, and constrained sites in town centres or historic settlements. Where sites are very well served by nearby public open space, a smaller amount of external amenity space may be considered acceptable. There may also be heritage constraints and considerations, particularly in the historic towns and villages in the district, which may influence the appropriate form of amenity areas provided.

3.86 Parking provision should be wholly integrated into the layout and design of the proposed scheme and respect and be informed by the character of the locality. Developments should not be dominated by hardstanding - especially extensive parking in front of terraced houses - or verge parking. The visual impact of parking on the character of the locality and on residential amenities should be mitigated by appropriate use of soft landscaping as part of the overall design. The siting of EV charge points will need to be considered as part of the overall layout and design of the vehicle parking arrangements for the development. Further requirements relating to parking, cycle storage and electric vehicle charging are set out in Policy LWL8.

3.87 Cycle parking and storage must be provided in accordance with Policy LWL8 and should be safe, secure, covered and conveniently accessible. They need to be conveniently located in relation to the dwelling so that they can be easily accessed by users, to encourage use of the bicycle to replace short car journeys. For some developments there may also be additional storage needs for large personal items such as children's buggies, wheelchairs or mobility scooters. While there may sometimes be space within dwellings to store such items this will not always be the case, particularly for flats or smaller houses, and in these cases, additional external storage will be required. Specialist housing schemes, for example for older people, may also have additional requirements. The design and siting of such storage will be similar to that required for cycle storage, that is,

it should be safe, secure, covered and conveniently located for users, within easy access of the dwellings.

3.88 Refuse and recycling storage and collection facilities should be considered at the beginning of the design process in new development to ensure that:

a. Adequate refuse and recycling facilities are provided to serve the development.

b. Storage of wheelie bins, communal waste bins and refuse sacks do not detract from the street-scene, obstruct access or detract from residential amenity.

c. There is convenient access, both for occupiers of the properties and for the collection vehicles and workers.

d. Storage and collection arrangements do not obstruct walking, wheeling or cycling routes or compromise the usability of private or communal amenity space.

3.89 The Waste Collection Authority will be consulted on relevant proposals to ensure these criteria are met.

Policy HOU14: Extensions to Residential Gardens in the Countryside

Status	Strategic
Priorities	Live Well Locally
Strategic Objectives	3
1. Extensions to the gardens of existing dwellings in the countryside will not be permitted unless the extension: a. Is modest in area and the change of use and associated domestic paraphernalia does not harm the rural character of the area; and b. Is to a natural boundary or is a logical rounding off.	
Key evidence and or guidance: • High Weald AONB Management Plan 2024-2029 • High Weald AONB Housing Design Guide 2019	

3.90 This policy applies to all extensions to the external residential area in the countryside, whether for garden use or for ancillary purposes to the dwelling.

3.91 Some householders and other property owners, particularly in countryside locations, seek to enlarge the extent of land in residential use surrounding their dwelling either to accommodate outbuildings, parking or for use as garden.

3.92 While such extensions can be acceptable, a prime objective in rural areas is to conserve the intrinsic value and locally distinctive character of the countryside. In the High Weald National Landscape, great weight will be given to the conservation of its landscape and scenic beauty, including respect for historic field boundaries. The erosion of countryside character, albeit incrementally, and the potential suburbanising effect caused by the enlargement of garden areas should be avoided.

3.93 Hence, any extensions to gardens should be modest in scale (such as to provide sufficient outside area for the reasonable enjoyment of the dwelling or to accommodate essential services) and create a logical new boundary to a natural feature such as a hedgerow, watercourse or woodland or otherwise constitute a "rounding off", which is acceptable in its impact on the rural character of the area.

3.94 Where a garden extension is acceptable, conditions may be attached to mitigate the visual impacts including, soft landscaping and, where the dwelling's curtilage is extended, permitted development rights may be removed for the erection of outbuildings and provision of hard surfaces.

Policy HOU15: Residential Extensions, Alterations & Outbuildings

Status	Strategic
Priorities	Live Well Locally
Strategic Objectives	2, 4

1. Extensions, alterations and outbuildings to existing dwellings will be permitted where they accord with relevant design, amenity, landscape and heritage policies, including the design principles in Policy LWL5 (Well-designed & Distinctive Places), where relevant, and where:

a. They do not unreasonably harm the amenities of adjoining residential properties in terms of loss of light, outlook or overlooking;

b. They respect and respond positively to the scale, form, proportions, materials, details and the overall design, character and appearance of the host dwelling, and are physically and visually subservient to the host dwelling, including its roof form, having regard to the building's original form and function and the cumulative impact of extensions;

c. They respond positively to important site features and do not detract from the character and appearance of the wider street-scene, settlement, landscape or countryside context, as appropriate, in terms of siting, built density, form, scale and massing;

d. They leave sufficient usable external private space for the occupiers of the dwelling;

e. They conserve and respond positively to the character, significance and setting of historic buildings, heritage assets and historic areas, where relevant;

f. In the case of outbuildings, they are in close proximity and subservient to the host dwelling, respect and respond positively to the character, appearance and setting of the host dwelling within its plot and the wider street-scene, landscape or countryside context through their siting, scale, massing, design and appearance and materials. The cumulative impact of multiple outbuildings will be taken into account;

g. In the case of rural workers dwellings, the development demonstrates how it would not undermine the long-term viability of the dwelling as a rural worker's dwelling.

Key evidence and or guidance:

- National design guidance (including the National Design Guide (2021), National Model Design Code and successor Design and Placemaking Planning Practice Guidance)
- High Weald AONB Housing Design Guide (2019)

3.95 Extensions and alterations to dwellings, and outbuildings, are often means of enabling people to better meet their housing needs without moving. Smaller proposals may not need planning permission (although generally require approval under the Building Regulations). Before carrying out development, up-to-date legislation should be checked. Proposals that do require permission will be considered against this Policy and, in the High Weald National Landscape, against the High Weald Housing Design Guide (section DG7).

3.96 This policy provides a practical, "checklist" type, approach for proposals for extension, alterations and outbuildings to dwellings, without being overly prescriptive or detailed.

3.97 In assessing proposals in relation to light, the Council uses the Building Research Establishment's principles in 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice'. In relation to whether there is an overbearing massing, this tends to arise most commonly where two-storey rear extensions are proposed, particularly on narrow width terraced properties or closely sited semi-detached properties.

3.98 Overlooking is most commonly an issue where windows to habitable rooms would directly face those in a neighbouring property, particularly when considering first floor side extensions, and should be avoided. In exceptional cases, obscured glazing may be considered where potential overlooking problems cannot be overcome, or windows should be set at an angle to avoid direct overlooking. In considering these factors, regard should be given to any significant change in level between properties, as this may increase the impact of an extension on the amenity of neighbours' homes.

3.99 To ensure that an extension or other building relates appropriately to the host dwelling and will contribute positively to the character of its locality, the design approach should draw on an analysis of local character and distinctiveness, undertaken in line with the policies within the Live Well Locally chapter, including LWL5. Drawings (elevations and sections) could show proposals in the context of adjacent buildings.

3.100 Traditional and contemporary design approaches may both be appropriate, depending on the character of the host building and its context. The success of either approach will depend on the quality and coherence of the design, including its scale, form, proportions, materials and detailing. Traditional designs should respond closely to the distinctive architectural and vernacular characteristics of the host building. Relevant considerations may include building form, roof span and pitch, storey heights, eaves details, materials, window proportions and traditional joinery. In historic contexts, locally characteristic materials and construction details, such as handmade clay tiles, brick, timber weatherboarding and traditional windows, may be particularly important. Contemporary designs should demonstrate a clear and coherent design concept, a sensitive relationship with the host building, high-quality materials and precise detailing. They should complement rather than compete with the existing building and should avoid forms, materials or details that appear arbitrary or poorly resolved.

3.101 In all cases, even where the existing building is of limited architectural merit, proposals should demonstrate basic design principles of scale, form, massing, height and proportion in relation to the existing dwelling and the wider area.

3.102 A good general principle is to ensure that extensions, especially side extensions, do not dominate the existing dwelling but, rather, are "visually subservient", such that they do not detract from the property's architectural integrity or the character of the street or lane. This can often be achieved by a combination of an appropriate elevational width and scale in relation to the existing dwelling, the setting back of the extension from the front wall of the house and stepping down of the roof ridge height. Particular care needs to be taken if an extension is proposed to only one side of a property to ensure that a visually balanced front elevation is created. Side extensions should normally seek to maintain external access to rear gardens.

3.103 In relation to side extensions, particular care should be taken to avoid infilling the gaps between detached or semi-detached houses where these are an important characteristic of the locality, creating a visual rhythm and density to the street, as it may result in a cramped, 'terracing effect' and detract from the character of the dwelling and the street scene.

3.104 Detailing and materials can be critical to a successful extension or other ancillary building. Every effort should be made to retain any distinctive architectural features and materials that contribute positively to the character of the building.

3.105 Retaining sufficient external private space to meet the continuing requirements of the dwelling is an important consideration in proposals for extensions and outbuildings, including the retention of usable and meaningful amenity/garden space and sufficient space for off-street parking and refuse/recycling facilities.

3.106 Alterations to roofs to create attic-level accommodation require careful design. Some roofs may not be suitable for conversion if their pitch is too shallow and sufficient headroom cannot be achieved without protruding above the ridgeline.

3.107 Successful dormer windows are achieved where they are appropriately positioned within the slope of the roof (and not on the hipped part of a roof) and have due regard to the arrangement and proportions of existing windows. This normally means aligning them over, or set slightly in from, windows in the elevations below, and being smaller sized than those below. Overly large or box-like dormers are inappropriate for the majority of

domestic properties, as they give the house a top-heavy appearance. Several dormer windows in a roof slope may also be harmful in terms of design or character.

3.108 For historic and other vernacular buildings, and in historic areas, the design and details of extensions and alterations will be carefully scrutinised to ensure that they are consistent with the specific architectural character and form of the existing dwelling and the character and appearance of the area.

3.109 Converted traditional farm buildings, including barns and oasthouses, are particularly vulnerable to inappropriate extensions, garages, sheds and other outbuildings that undermine the intrinsic character of the building as an example of a particular building typology or would domesticate and detract from the character of the countryside setting.

3.110 Modest single storey outbuildings which are ancillary to the main dwelling and reflect its character and materials can contribute to the character of a locality. The siting of outbuildings, including garages, needs careful consideration in terms of both the relationship with the main house – particularly if it is of heritage value – and the wider street-scene avoiding cramping or cluttering the site or adversely affecting the amenities of neighbouring properties. Discreet siting is generally preferred, as siting buildings in front of the main house often dominates the plot frontage, detracting from the appearance of the dwelling in the street scene. In rural areas, especially within the High Weald National Landscape, it is important that outbuildings conserve landscape character and qualities and do not 'suburbanise' this sensitive countryside. Multiple outbuildings can exacerbate these impacts and therefore the cumulative impact of multiple outbuildings on a site will be taken into account.

3.111 It is also important that any extension or alteration to a rural worker's dwelling does not undermine its long-term viability as a rural worker's dwelling (for example by making it too large and high value), as these dwellings serve a defined purpose to support rural industries where wages tend to be lower than average.

Policy HOU16: Annexes

Status	Strategic
Priorities	Live Well Locally
Strategic Objectives	2, 4

1. The creation of residential annexes will be considered in accordance with a sequential approach in the following order:

    a. An extension to the dwelling;

    b. The conversion of an existing outbuilding within the residential curtilage that is located in close proximity to the dwelling; and

    c. A new building located within the residential curtilage in close proximity to the existing dwelling and with a demonstrable link to the main dwelling, such as shared vehicular access, communal parking and amenity spaces, where appropriate.

2. All proposals will be assessed against the criteria of Policy HOU15 (Residential Extensions, Alterations & Outbuildings) to ensure that they are appropriate in terms of the existing dwelling, surrounding area and amenities of occupants of nearby properties. In all cases, annexes should be the minimum size required to meet the intended purpose and should share facilities and amenities with the main dwelling.

3. In all cases, the occupation of the annexe shall be managed by planning condition or exceptionally a planning obligation to ensure that the accommodation is tied to the main dwelling, cannot be used as a separate dwelling and cannot be sold separately.

Key evidence and or guidance:

- National design guidance (including the National Design Guide (2021), National Model Design Code and successor Design and Placemaking Planning Practice Guidance)
- High Weald AONB Housing Design Guide (2019)

3.112 A residential annexe is defined as accommodation ancillary to the main dwelling within the residential curtilage that provides additional semi-independent accommodation usually for members of the same family or household, often older family members who may need assistance with health care. There are an increasing number of people who, although capable of living relatively independently, would benefit from living close to relatives or carers on whom they can rely for help and support. While this may sometimes be met through the rent or purchase of a nearby property, in other situations residential annexes provide for the carer or relative to be on hand at short notice to provide care and support, including through shared facilities.

3.113 Where it is needed, the general principle is to support such accommodation in a way that enables it to be most effectively incorporated into the dwelling and site. An annexe can

be provided in the form of an extension to the dwelling, the conversion of an existing outbuilding or in some cases a new detached building.

3.114 An extension to the dwelling is normally most appropriate, as this better integrates the annexe into the dwelling for use of shared facilities and providing ready access (including internal linkages), normally also minimising the impact on neighbours, and provides advantages for the longer-term use of the annexe, potentially reducing pressure for future, inappropriate development. For this reason, a sequential approach is taken for proposals for annexes: firstly, looking at whether the required accommodation can be provided in the form of an extension to the dwelling; if not, considering whether an existing outbuilding within the residential curtilage could be converted; if not, then considering the potential for a new separate annexe building located in close proximity to the existing dwelling. Exceptions to this approach may be where the extension of an existing dwelling would not be appropriate; for example, in some cases relating to listed buildings, non-designated heritage assets or historic agricultural buildings.

3.115 In all locations, considerations of character, scale and design and amenity impacts will be similar to those set out for extensions, alterations and outbuildings above. The size of the annexe will need to be demonstrated to be that necessary to meet the intended purpose, normally with one bedroom only, and demonstrate that it will be capable of being incorporated into the use of the dwelling in the longer term. In any case, an annexe will need to be designed to be subservient to the host dwelling and not read as an independent dwelling/plot.

Policy HOU17: Boundary Treatments & Means of Enclosure

Status	Strategic
Priorities	Live Well Locally
Strategic Objectives	3, 4

1. When planning permission is required for new or altered boundary treatments or other means of enclosure, including fences, walls, gates, gate piers and hedges it will be supported where:

    a. The proposal does not involve the loss of existing boundary structures of historic or architectural interest;

b. The proposed boundary treatment, by virtue of design, height, materials and/or species, is consistent with the character of the locality. In the rural areas, the proposal would not, by virtue of its siting or appearance, adversely impact on the undeveloped character of the countryside or introduce a suburban or urban feature into the rural area;

c. Where fencing could be considered appropriate, it should be made of locally grown and/or coppiced material in accordance with Policy LWL5 (Well-designed & Distinctive Places);

d. The proposal is acceptable in terms of highway safety;

e. The design has taken account of the potential effects on wildlife and ecological networks and corridors.

Key evidence and or guidance:

- National design guidance (including the National Design Guide (2021), National Model Design Code and successor Design and Placemaking Planning Practice Guidance)
- High Weald AONB Housing Design Guide (2019)

3.116 Planning permission for new means of enclosure (or alterations to existing means of enclosure) may be required in certain circumstances. Before carrying out development, up-to date-legislation should be checked.

3.117 This policy applies to simple proposals for new boundary treatments, but also to planning applications for new dwellings or larger housing developments which include boundary treatments.

3.118 The height of boundary treatments and means of enclosure, as well as any gates or gate piers, needs sensitive consideration. When on a boundary, they should be similar in height to the prevailing height of existing boundaries in the area. Also, where there is a repeated style of boundary treatments, for example low walls, railings or an open plan, boundary-free approach, then the Council will normally expect any development proposal to follow the predominant style in the vicinity and to maintain and strengthen the existing character of the street scene.

3.119 In terms of the forms of enclosure, while close-boarded fencing provides screening for privacy, it is not always appropriate. Close-boarded fences and walls along road frontages can punctuate and detract from the more natural and open character of rural areas and lanes, particularly in the High Weald National Landscape. Open post-and-rail fencing on

frontages has the advantage of maintaining a natural and open character, while estate railing can also be an appropriate boundary treatment in certain rural areas. The use of locally sourced material, such as from coppiced woodlands, is supported as this aligns with the High Weald Management Plan's aims of supporting local forestry industries as well as the successful management of local woodlands. However, the predominant boundary type in the rural areas consists of mature trees, hedges and ditches, which are in keeping with the rural scene and provide a continuity of characteristic landscape. Hedges can also predominate and positively impact the street-scene in urban areas.

3.120 If a more solid enclosure is necessary, in some instances it may be appropriate for a fence or wall to be set back from the boundary with sufficient space for the planting and future maintenance of a hedge in front with sufficient room that, when mature, it will sit 'in-line' with any existing adjoining hedging or other boundary line. The future retention of the hedge would be subject to a planning condition.

3.121 More generally, hedges and trees that define historic field boundaries are regarded as important components of landscape character, especially within the High Weald National Landscape. To reinforce local character within the High Weald, in specifying any new hedging, the "High Weald Soft Landscaping & Planting Plans in Development Proposals Planning Technical Advice Note" should be used. In urban areas the Council would normally seek species such as laurel, hazel, holly, yew, box, hornbeam and beech. Existing planting and hedgerows that are incorporated into new developments should be within public areas and spaces to ensure their future retention, maintenance and management.

3.122 All forms of boundary treatment and means of enclosure can have both positive and negative impacts on wildlife and ecology. The East Sussex and Brighton & Hove Local Nature Recovery Strategy outlines the importance of nature and habitat corridors in both urban and rural gardens. Benefits include new planted boundary treatments utilising native species resulting in new or improved habitats. However, some forms of solid boundary treatment can negatively impact on wildlife corridors, ecological networks and the movement of species. This includes wildlife such as hedgehogs and deer whose natural pathways can be inadvertently blocked by solid fencing. Proposals will be required to demonstrate how potential impacts have been considered and avoided through the design and layout of new boundary treatments.

Policy HOU18: Accesses & Drives

Status	Strategic
Priorities	Live Well Locally
Strategic Objectives	1, 3

1. Proposals for new and relocated accesses and drives will be supported where:

    a. They are acceptable in terms of highway safety, including for people using active travel;

    b. By virtue of their location, design and materials (including any soft landscaping) they would maintain the character of the locality, including in the rural areas;

    c. They involve the relocation of an existing access, if there are highway safety reasons for relocating the existing access, and the stopping up of this existing access; and

    d. Either, they are constructed of permeable materials, or appropriate drainage is included to manage surface water run-off in accordance with Policy ENV3 (Sustainable Surface Water Drainage). Loose driveway surfaces are resisted for highway safety reasons.

Key evidence and or guidance:

- National design guidance (including the National Design Guide (2021), National Model Design Code and successor Design and Placemaking Planning Practice Guidance)
- High Weald AONB Housing Design Guide (2019)
- East Sussex County Council Guidance on Parking at New Developments (2024)

3.123 Planning permission for new or improved residential accesses may be required in certain circumstances. Before carrying out development, up-to-date legislation should be checked. Irrespective of the need for planning permission, any works to a Public Highway such as altering the verge or pavement or providing a dropped kerb will require a separate Crossover Licence from the County Highway Authority, or, for the A21 and the A259, consent from National Highways.

3.124 A key issue for consideration in proposals involving a new access or driveway is the effect on highway safety. This applies to the creation of new accesses and well as the relocation of existing accesses. New drives and accesses onto classified roads should include turning provision to ensure vehicles can enter and exit in a forward gear. Second accesses for in-and-out driveways are resisted unless highway safety benefits are demonstrated. This applies to single dwellings and smaller developments where multiple access could have an effect on highway safety as well as potential visual impacts. Larger-scale developments

may benefit from multiple accesses to enable wider connectivity, though this will still be subject to highway safety considerations.

3.125 As well as the effect on vehicle users, the effect on people using active modes of travel should be considered. In some situations (usually for multiple-dwelling schemes) a site access will need to include a separate footway/cycleway.

3.126 A particular issue can arise where a new access or driveway or the required sightlines would result in the loss of some boundary feature, often a hedge, which contributes positively to the character of the street scene. This will require balancing of amenity, character and highway safety considerations. Careful siting is required to minimise the amount of any hedge loss and such loss would be expected to be mitigated by replanting with matching species behind the sight lines of the access in accordance with Policy LAN3 (Trees, Woodlands & Hedgerows). Consideration should also be given to the effect of removing any landscape features on biodiversity and whether there are opportunities to improve the biodiversity value of the site, in accordance with Policy ENV8 (Habitats & Species.

3.127 Where a new access is to be created, care should also be taken in the design and choice of materials to match the character of the locality, for example in the width of the access and corner radii (subject to highway safety requirements), surfacing materials, provision or not of any kerbing materials, and treatment of verges, particularly to ensure that the works would not suburbanise the character of the rural areas. The High Weald Design Guide outlines the considerations for street surfaces and materials in Section DG9 and generally seeks a simple palette of materials and reference to local street types. In urban areas, the hard surfacing of front gardens, especially small gardens, for vehicle parking can have a significant impact on the appearance of buildings and the wider landscape and on drainage. Loose driveway surfaces are not considered acceptable due to the risk they pose to vulnerable users like motorcyclists and cyclists.

Chapter 4: A Thriving Local Economy

Policy ECO1: Supporting a Thriving Local Economy

Status	Strategic
Priorities	Green to the Core, Live Well Locally, Thriving Local Economy
Strategic Objectives	3, 4, 5, 6, 8

1. The Council will promote and help to facilitate sustainable economic development to support a thriving local economy. It will seek to create the right conditions for businesses to start-up, grow and adapt, as well as to ensure that local communities benefit from access to a wide range of good quality jobs, education and training opportunities. This will be achieved by:

    a. Safeguarding land for a range of employment uses to meet identified needs, and directing new employment development to these locations, together with supporting the renewal of employment land and sites, to help retain and attract businesses, in line with Policies ECO3 (Safeguarding Employment Land & Premises) and ECO4 (Retention of Sites of Economic or Community Value).

    b. Ensuring the district's main commercial centres at Bexhill, Rye, Rye Harbour and Battle remain a focus for economic activity.

    c. Supporting the long-term vitality and viability of the district's town and district centres along with villages, recognising their role as focal points for commercial, leisure, community and cultural activity, and resisting inappropriate out-of-centre development for new main town centres uses, in line with Policy ECO6 (Supporting Town & Village Vitality).

    d. Building on Rother's strengths as an important visitor and leisure destination by growing the visitor economy in accordance with Policy ECO7 (Tourism Activities, Facilities & Accommodation), including opportunities presented by the district's cultural and heritage assets, coastal areas, the High Weald National Landscape and other environmental assets.

    e. Supporting rural economic activities and diversification, and appropriate development associated with these activities, including for agricultural, equestrian and other land-based rural business uses.

    f. Supporting proposals for low cost and affordable workspace in appropriate locations.

g. Working with stakeholders to coordinate the delivery of new and improved infrastructure (including transport infrastructure) to enable and enhance access to key employment and commercial areas as well as education and training facilities, both within and beyond the district.

h. Supporting the improvement of digital infrastructure across the district to meet the requirements of modern business and to enable flexible working practices.

i. Supporting the transition to a green economy and encouraging new employment development to contribute positively to climate change resilience, including by applying circular economy principles and achieving zero carbon solutions.

j. Seeking opportunities for education, workplace training, apprenticeships and other skills development including by securing planning contributions, where appropriate in accordance with Policy ECO12 (Local Employment & Skills).

k. Cooperating with neighbouring authorities and other key stakeholders to support economic growth and investment across East Sussex.

Key evidence and/or guidance

- East Sussex 2050 Economic Prosperity Strategy
- Rother Economic Recovery Action Plan (2020)
- Rother and Hastings Housing and Economic Development Needs Assessment (HEDNA) (2024) and update (2026)

4.1 National planning policy requires Local Plans to set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth. This policy helps give effect to the Government's Industrial Strategy[90] and the East Sussex Economic Prosperity Strategy, which provide a strategic framework for coordinating investment and economic development across the wider East Sussex area. The policy recognises the important role that Rother has in the regional context and seeks to respond to the district's business development challenges and needs, together with building on its existing economic strengths and opportunities.

4.2 Evidence indicates that Rother district forms part of a 'Functional Economic Market Area' (FEMA) with Hastings borough. While there are commuting links between Rother, Hastings and other neighbouring authorities (namely Eastbourne, Wealden and Tunbridge

[90] Invest 2035: The UK's Modern Industrial Strategy (UK Government, June 2025).

Wells) the commuting links within and between Hastings and Rother are significantly stronger, equating to an overall self-containment rate of 79 per cent.[91] It is therefore important that Rother is not considered in isolation for economic development and forward planning.

4.3 Whilst the FEMA is located within the prosperous South East, the geography of the area presents challenges that impact significantly on its economy, in contrast with the wider region. For example, the two major towns of Bexhill and Hastings are coastal centres which, like many others in the southeast and elsewhere in England, have experienced persistent economic challenges. Furthermore, the characteristically rural nature of Rother, including a high proportion of the land being within the High Weald National Landscape, presents land-use constraints for new major industrial and commercial development in the countryside.

4.4 Workforce qualification levels across the FEMA are lower than regional and national averages, while the proportion of the workforce in Rother with no qualifications is noticeably greater still. There are skills gaps particularly for higher-skilled and specialist technical jobs. This in turn is reflected by a comparatively lower-paid job profile and pressures on the cost of living, which has been exacerbated with rising housing costs. For instance, house prices in Rother were more than 12-times the median earnings in 2022[92]. There are wide economic disparities between areas within Rother, with the most deprived areas in parts of Bexhill and Rye, ranking amongst the highest in the country. For sustainable economic development, there is an imperative to improve the qualifications of the working age population to enhance access to higher-skilled jobs and support business productivity.

4.5 Despite these challenges there are important opportunities for economic growth and business development in Rother. The district contains the town centres of Bexhill, Rye and Battle along with the district centres of Sidley and Little Common. These centres, together with villages dispersed across the district, provide focal points for commercial and community activity. Rye Harbour is a key employment location particularly for industrial uses, together with established industrial estates within Bexhill, on the Hastings Fringes and elsewhere within the district. Rural economic activities, including agriculture and equestrian uses will continue to remain important to Rother. Agricultural and other land-based business diversification can support the resilience of this sector in the future.

[91] HEDNA (2024)

[92] Office for National Statistics. Housing affordability in England and Wales.

4.6 Rother is also well poised to build on its strengths as a key visitor and leisure destination, given its wide range of natural and heritage assets. These include the coastline and attractive beaches, High Weald National Landscape and historic market towns as well as the Rye Citadel, Battle Abbey and proximity to the Hastings Battlefield. Tourism attracted some 5.61 million trips to Rother in 2022, with annual visitor expenditure amounting to some £202 million (equivalent to £16.8 million per month). Some 5,800 jobs in Rother are supported by the visitor economy, and it is estimated that 21.6% of the district's population is employed directly or indirectly as a result of tourism.[93]

4.7 The delivery of new and improved infrastructure will be vital for inward investment and to unlock opportunities for business growth and development, as well to enhance the wider community's access to job and training opportunities. This includes transport and digital infrastructure required for modern economic activities. The delivery of such infrastructure will also support objectives around climate change and decarbonisation to achieve net zero emissions.

4.8 Subsequent policies in this chapter address these different aspects of economic growth in Rother.

Policy ECO2: New Employment Development

Status	Strategic
Priorities	Green to the Core, Live Well Locally, Thriving Local Economy
Strategic Objectives	6, 7, 8, 11

1. Development proposals for new employment development (Class E(g), B2, B8 and associated Sui Generis uses) will be supported where they are appropriately located, including by being of a scale and nature that is suitable to the site and locality. Priority should be given to locating new employment uses within:

    a. Established employment areas (including through sensitive expansion of existing sites);

    b. In locations where provision has been made for these uses in site allocations; and

[93] Tourism and Visitor Accommodation Study (2026).

c. In other areas or sites that are within or well connected to settlements and the services and facilities necessary to support the employment use.

2. Appropriate employment development in the countryside will be supported in line with Policy SS4 (Strategy for the Countryside), including through the sensitive, normally small-scale growth of existing business sites and premises, and by the conversion, for employment use, of farm or other rural buildings in accordance with Policy ECO9 (Agricultural Development & Forestry).

3. All new employment development must be of a high-quality design and not have unacceptable adverse impacts on local amenity, the environment and the highway network. Development proposals must ensure that transport, access and parking requirements and impacts have been fully considered and assessed, in line with other Local Plan policies.

4. Development proposals should seek opportunities to ensure site layouts, buildings and spaces are designed to be flexible and/or adaptable to a wide range of employment uses and occupiers over their lifespan, and to make provision for connections to high-speed broadband.

5. Development proposals involving the renewal and regeneration of employment land/floorspace (including alterations to buildings, the reconfiguration of sites, as well as the sensitive expansion of employment sites) to enhance its suitability and attractiveness for business use will be supported in principle.

Key evidence and/or guidance

- East Sussex 2050 Economic Prosperity Strategy
- Rother Economic Recovery Action Plan (2020)
- National design guidance (including the National Design Guide (2021), National Model Design Code and successor Design and Placemaking Planning Practice Guidance)

4.9 This policy helps give effect to the economic development strategy, as set out in Policy ECO1 (Supporting a Thriving Local Economy), as well as the spatial strategy, by ensuring that all new employment development is appropriately located and designed to a high-quality.

4.10 The policy seeks to direct new development to existing employment areas and centres, where businesses can benefit from a complementary cluster of uses and to enable people to access jobs locally. Some site allocation policies include provisions for new employment uses to be delivered in order to meet identified needs, as well as to support

sustainable communities. New employment development in the countryside will need to be carefully managed in order to protect local character and the High Weald National Landscape, however it is recognised that new employment land and business space can support rural economic activities.

4.11 Like all development, new employment development must be designed to respond positively to its local context. Some employment uses, such as industrial and warehousing uses, have the potential to impact significantly on local amenity. Careful consideration is therefore needed to the location, layout and design of development along with the nature of uses. The policy should be read together with other Local Plan policies covering design as well as good practice guidance, including the National Design Guide. Where possible, buildings and spaces should be designed to be flexibly specified and adaptable to a wide range of end users. This will help to ensure that development remains viable for employment uses over the long-term and can respond to the changing requirements of modern businesses.

4.12 Development proposals must demonstrate that there will be no adverse impacts on the highway network and public safety, with appropriate arrangements for parking. Proposals impacting the Strategic Road Network (SRN) must include a Transport Assessment and Travel Plan, as outlined in Circular 01/2022. Where the development will create a need for new parking, this will need to be compliant with East Sussex County Council's Guidance on Parking at New Developments.

Policy ECO3: Safeguarding Employment Land & Premises

Status	Strategic
Priorities	Live Well Locally, Thriving Local Economy
Strategic Objectives	6, 9

1. Employment land and floorspace that is allocated for employment use, is currently in employment use, and/or which was last authorised for employment use will be safeguarded to meet Rother's identified employment needs.

2. Development proposals involving the loss of employment land/floorspace should be avoided. They will only be acceptable where it is clearly demonstrated that there is no reasonable prospect of the land/floorspace

being retained solely in employment use and the proposal meets the tests set out in Policy ECO4.

3. Where (2) above applies, development proposals for complementary enabling mixed-use development (including a component of employment land/floorspace), should be explored in the first instance. In such cases, the non-employment component should be the minimum amount required to make the employment use(s) viable, as demonstrated through a Viability Assessment.

4. Where it is suitably demonstrated that the continued use of employment land/floorspace is not viable through an enabling mixed-use scheme, development proposals will be expected to consider alternative uses in the following order of priority:

    a. Appropriately located main town centre uses, having regard to Policy ECO6 (Supporting Town & Village Vitality);

    b. Community uses;

    c. 100% affordable housing;

    d. Residential uses.

5. Development proposals for the change of use from class E(g)(i) and E(g)(ii) to class B2 and B8 uses will be supported where they are appropriately located and designed, in particular in terms of their impact on residential amenity.

Key evidence and/or guidance

- Rother and Hastings Housing and Economic Development Needs Assessment (HEDNA) (2024) and update (2026)
- Rother Housing and Economic Land Availability Assessment (2026)

4.13 For the purpose of the Local Plan and this policy, employment uses are defined as uses covered by Class E(g) (offices, research and development, light industrial), Class B2 (general industrial) and Class B8 (storage and distribution), as set out in the Town and Country Planning (Use Classes) Order. They also cover employment related Sui Generis uses which will be established on a case-by-case basis, having regard to the nature of the use and relevant legislation.[94]

[94] Use Classes as defined by the Town and Country Planning (Use Classes) Order 1987 (as amended) and Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

4.14 Planning legislation allows some changes of use between use classes without the need for a planning application, where certain conditions are satisfied. Subsequently, this policy only applies in cases where planning permission is required.

4.15 National planning policy requires the Local Plan to make sufficient provision for identified employment needs. The joint Hastings and Rother Housing and Economic Development Needs Assessment Update (2026) provides the latest evidence of need for employment land and floorspace in the district and has been informed by job growth forecasts. The HEDNA concludes that 26.2 hectares of employment land are required in Rother over the plan period. The breakdown of this need is set out in Figure 4.1 below.

Figure 4.1: Rother employment land requirements 2025-2042, by type (hectares)

E(g) (i and ii)	E(g)(iii) / B2	B8	Total
Office / research and development	General industrial	Storage and distribution	
4.4	8.0	13.9	26.2

4.16 When the existing development pipeline is taken into account, a significant amount of this need is set to be addressed through planning commitments, leaving a shortfall of 0.8 hectares of employment land, the breakdown of which is set out in Figure 4.2 below.

Figure 4.2: Rother employment land demand/supply balance 2025-2042, by type (hectares)

E(g) (i and ii)	E(g)(iii) / B2	B8	Total
Office / research and development	General industrial	Storage and distribution	
+9.7	-1.6	-9.0	-0.8

4.17 The updated supply and demand balance assessment identifies a residual requirement of approximately 0.8 ha overall. However, this headline position masks a more significant difference by use class. There is an identified surplus of around 9.7 hectares for class E(g)(i) and (ii) uses, but residual requirements of around 1.6 hectares for class E(g)(iii)/B2 uses and 9.0 ha for B8 uses.

4.18 The Local Plan makes sufficient provision of land to meet the overall quantum of identified employment needs in full. The need will be met through a combination of supply from site allocation policies (including new employment allocations and carrying forward undelivered sites from the Development and Site Allocations Local Plan, where appropriate) and the current development pipeline (schemes that are consented and/or under construction and due to be completed within the plan period).

4.19 The employment land portfolio will need to be carefully managed over the plan period. This is in order to ensure a sufficient supply of land and space in Rother to meet the needs of business now and in the future. Given the identified need and current supply position, this policy seeks to safeguard land and premises that are currently in or allocated for employment use. The policy also makes provisions for rebalancing of the employment land portfolio to better meet identified needs. It therefore seeks to encourage and support changes of use to industrial and warehousing uses on appropriate sites, where local needs are now greatest.

4.20 To ensure the Local Plan takes a positive approach to development and can respond to changes in economic or other circumstances that may arise over the plan period, the policy, together with Policy ECO4, provides flexibility for the loss of employment land in limited cases.

Policy ECO4: Retention of Sites of Economic or Community Value

Status	Strategic
Priorities	Live Well Locally, Thriving Local Economy
Strategic Objectives	6, 9

1. Development proposals that will result in the loss or diminution of sites of economic or community value[95], including those last in such use, must demonstrate that there is no reasonable prospect of a continued use.

2. To comply with (1) above, robust evidence must be submitted and should include:

    a. Details of a comprehensive and sustained marketing campaign which clearly indicates a lack of demand for the existing use (or as an alternative economic use where the existing use is economic, or alternative community use in the case of an existing community facility), based on marketing, normally at least 18 months, that offers the land or unit/s for sale, or rental, at a realistic valuation of the site/premises for that use; and

[95] *This includes an employment use within Use Classes E(g) (i, ii, iii), B2 and B8, a community facility within Use Classes F1 or F2, a local shop within Use Class F2, a theatre, public house, venue for live music performance, cinema, concert hall, or any form of tourist accommodation or attraction...*

b. An independent viability assessment that clearly demonstrates that the unit is not or is not capable of being financially viable, including alternative economic or community facilities, where appropriate.

3. Development proposals should not result in the loss of facilities or features which may undermine the viability of the existing economic or community use, including but not limited to car parks, gardens and function rooms.

4. On a case-by-case basis and in limited circumstances, this policy may be applied flexibly where the Council is satisfied that:

   a. The site and building are demonstrably unsuitable for continued use and occupation as a site of economic or community value due to its size, location or condition; or

   b. The proposal would deliver public benefits that outweigh the harm arising from the loss or diminution of the existing or alternative economic or community use, having regard to the objectives of the Local Plan.

Key evidence and/or guidance

- Rother and Hastings Housing and Economic Development Needs Assessment (HEDNA) (2024) and update (2026)
- Rother Housing and Economic Land Availability Assessment (2026)

4.21 Employment sites and premises, community facilities, local shops, tourist attractions and accommodation, holiday sites and leisure facilities all play an important economic and social role within the district, making a positive contribution to maintaining and developing sustainable communities. At the same time, there are commercial pressures for such sites and uses to change to alternative higher value uses, such as housing. This often leads to local concerns about the loss of facilities and job opportunities. The erosion of sustainable communities and harm to the local economy is at the heart of concerns. It follows that it is vital to provide a clear policy framework to consider proposals involving losses of such uses.

4.22 The principle of the retention of sites for uses that require protection through the Local Plan is established through Policy ECO3 (Safeguarding Employment Land & Premises) in respect of employment uses; Policy ECO7 (Tourism Activities, Facilities & Accommodation) for tourism activities, facilities and visitor accommodation; and Policy ECO4 for sites of community use including local shops, services and facilities. Collectively, these policies establish that sites of economic and community value, as defined by their

respective policies, are normally retained, and their loss resisted unless it is evident that they cannot be maintained or that their continued use would perpetuate real harm to local amenities in some way. This policy sits alongside the above strategic policies by setting out the requisite marketing and viability evidence required to properly decide what constitutes no reasonable prospect of continued use. It is acknowledged that there is a raft of "permitted development" rights affecting some economic and community uses, particularly those within Use Class E, meaning that some changes of use do not require an application for full planning permission. The policies provide the framework for decision making when planning permission is required.

4.23 To satisfy the policy test to change one of the protected uses as detailed in the policy, a comprehensive, sustained marketing campaign must be undertaken, offering the premises for sale or for rent, at a realistic valuation of the premises for the permitted use. Ordinarily, the marketing campaign should run for a period of at least 18 months before the planning application is submitted, with the premises offered for sale locally and regionally in appropriate publications including through trade agents. Details must accompany relevant planning applications, including two independent valuations of the building in its current condition/state.

4.24 Sites must be advertised with the option of an alternative commercial or community facility, appropriate to the site and in line with other policies in the Local Plan. Where applications relate to a public house, the property must be advertised free of tie and restrictive covenant. Applications must also have full regard to the provisions set out in the Campaign for Real Ale (CAMRA) Public House Viability Test. Where a proposal relates to the loss of tourist accommodation it will be considered against a range of quality measures such as independent customer reviews, trading standards reports, environmental health reports and industry insight, to determine whether the site is genuinely unsuitable.

4.25 In terms of financial viability evidence, the Council will ordinarily require submission of trading accounts for the last three full years in which the business was operating on a full-time basis. In schemes affecting tourism accommodation, consideration will also be given to the adequacy of marketing measures to attract holiday lettings. Where an applicant wishes to make a case that a site is not, or is not capable of being financially viable, evidence must demonstrate the viability of alternative commercial or community facilities, where appropriate. The Council will then obtain independent verification of the viability evidence submitted, which is to be undertaken at the developer's expense. Applications must also be accompanied with supporting information to demonstrate how the applicant

has brought forward measures to improve viability of the business over the short/medium/long-term. This would also help to ensure that the policy requirements draw a distinction between businesses that are no longer viable and those that are not being run effectively. The Council's National and Local List of Planning Application Requirements expands on the evidence to be supplied in support of a proposal under this policy.

4.26 Criterion 4 of the policy allows the Council to take a flexible approach in applying the other policy requirements in limited situations, on a case-by-case basis where particular circumstances exist. Possible circumstances where criterion a) may apply include premises that are demonstrably obsolete, underutilised, in poor condition, or no longer suitable (and cannot be made suitable) for modern operational requirements due to their size, layout, location or physical constraints. Possible circumstances where criterion b) may apply include proposals that would deliver significant affordable housing, healthcare, education, transport infrastructure or other public benefits that outweigh the harm arising from the loss or diminution of the use. If an applicant is seeking to satisfy Criterion 4 of the policy, early pre-application discussions with the Council are encouraged in order to determine at an early stage whether this approach is likely to be accepted.

4.27 It should be noted that development proposals that result in the loss of sites or premises currently or last used for community purposes are not subject to the requirements of this policy where they accord with Policy HWB3 (4) (a), i.e. that alternative provision of the equivalent or better quality is available in the local area or will be provided and made available prior to the commencement of redevelopment of the proposed scheme.

Policy ECO5: Temporary Uses

Status	Non-Strategic
Priorities	Live Well Locally, Thriving Local Economy
Strategic Objectives	6, 9, 11

1. Proposals for the temporary use of vacant or underutilised buildings, structures, and cleared land for economic, commercial, community, cultural, or social purposes will be permitted provided they comply with the following criteria:

    a. The temporary use, including any associated temporary structures, is suitable for its location and will not prejudice or delay the long-term

delivery of the Local Plan development strategy, any site allocation requirements, or the site's allocated or permitted permanent use;

b. Any physical alterations to existing buildings or the introduction of temporary structures, such as modular containers, must be capable of being reinstated to their original or agreed state if required (as per Criteria 3(b). below), and must not compromise the safe functioning of surrounding infrastructure;

c. The site provides an acceptable level of amenity for its occupiers, and the operational impacts of the temporary use - including noise, odour, dust, light pollution, litter, anti-social behaviour, and hours of operation - will not cause unacceptable harm to the amenity of neighbouring properties, or the character of the locality.

2. Particular support will be given to suitable temporary uses in designated town and district centres, on stalled development sites, and on future phases of allocated sites that remain inactive.

3. Where planning permission is granted for a temporary use, the Council will secure conditions to:

a. Limit the permission to a specified, time-bound period appropriate to the site circumstances and long-term development trajectory;

b. Require the cessation of the use, the complete removal of all associated temporary structures/infrastructure, and the full reinstatement of the land or building to its prior condition (or a condition agreed with the Council) upon the expiration of the temporary permission.

Key evidence and/or guidance

- East Sussex 2050 Economic Prosperity Strategy
- Rother Economic Recovery Action Plan (2020)

4.28 The NPPF makes clear that planning policies should allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances, and as such, this policy provides a supportive framework to enable these interim uses across the district while ensuring they do not prejudice permanent allocated developments.

4.29 "Temporary use" or "meanwhile use" refers to the interim occupation of empty properties or land before a long-term development or permanent occupation comes forward. Examples of such use include: artistic and cultural venues, economic or job-

generating enterprises, pop-up retail, street food markets, co-working or maker spaces, community gardens, temporary sports and leisure facilities, flexible modular structures, and temporary residential accommodation.

4.30 These uses can deliver considerable social, cultural, and economic value. For example, they can mitigate the impacts of vacant buildings and stalled development sites on local communities, such as depressing footfall, attracting anti-social behaviour, and harming the vitality of high streets and neighbourhoods.

4.31 The supportive policy for temporary uses also allows for a faster, more responsive reaction to market changes and the needs of vulnerable communities. In particular, the deployment of temporary accommodation using Modern Methods of Construction (MMC) enables the activation of vacant spaces to meet immediate housing demand. This helps alleviate acute housing pressures while reducing the financial costs associated with traditional temporary accommodation placements.

Supported locations

4.32 While particular support is directed towards designated town and district centres, on stalled development sites, or phased allocations; proposals elsewhere are also supported where the site's suitability for the specific use can be demonstrated, having regards to the requirement of Policy SS2 (Development Boundaries) and policies in the Live Well Locally chapter. For example, a use which would otherwise be inappropriate in the countryside will not be considered appropriate simply because it is proposed to be temporary.

4.33 On larger development schemes with extended buildout trajectories, certain phases of a site may remain inactive for prolonged periods. The Council encourages and supports the introduction of appropriate temporary uses on these inactive phases. This ensures that land remains productive, safe, and beneficial to the local community before the permanent development is brought forward.

Implementation and safeguards

4.34 Applicants are encouraged to engage in early pre-application discussions with the Council to ensure the viability and suitability of the proposed use. Where temporary residential accommodation is proposed, proposals should refer to the Council's adopted Housing Development Strategy.

4.35 While the Council is supportive of meanwhile initiatives, they must remain genuinely temporary. This policy establishes a rigorous framework to ensure that temporary permissions do not mutate into inappropriate permanent uses or inadvertently stall the comprehensive delivery of allocated housing or employment sites. Each application will be assessed on a case-by-case basis, with time limits strictly tied to the anticipated delivery schedule of the primary allocation or masterplan framework where relevant.

Policy ECO6: Supporting Town & Village Vitality

Status	Strategic
Priorities	Live Well Locally, Thriving Local Economy
Strategic Objectives	4, 5, 6, 7, 9, 11

1. The long-term vitality and viability of the district's Town and District Centres will be achieved by reinforcing and enhancing their role as focal points of community, cultural and commercial activity, including by supporting their evolution as vibrant, adaptable and resilient mixed-use areas.

2. The locally distinctive character of the district's rural villages will be protected, while ensuring thriving and viable rural communities through supporting high-quality sustainable economic growth and the retention of community facilities.

3. Development proposals should contribute positively to the vitality and viability of town centres and villages, and support the Live Well Locally priority and policies, including by:

    a. Ensuring a wide range and complementary mix of uses, including residential uses where appropriate;

    b. Making provision for high-quality public realm that enhances the attractiveness of centres and improves accessibility to and within them, particularly by active travel; and

    c. Taking opportunities to bring vacant land, buildings and units into active use, including through appropriate temporary uses in line with Policy ECO5 (Temporary Uses).

    d. Retaining and improving provision of shops and facilities that meet the day-to-day needs of local communities.

Town centre hierarchy and the sequential test

4. Main town centre uses[96] involving new development should be located within the identified Town and District Centres; then, if this is not feasible, in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered. The hierarchy of centres is as follows:

   Town Centres

   Bexhill Town Centre

   Rye Town Centre

   Battle Town Centre

   District Centres

   Sidley District Centre

   Little Common District Centre

Primary Shopping Areas

5. Primary Shopping Areas, as defined on the Policies Map, will be maintained as the main focus for retail uses and development within Town Centres.

Retail and leisure impact assessments

6. Development proposals for main town centre uses located outside of designated Town and District Centres will be required to satisfy the sequential test and submit an impact assessment, in line with national planning policy and the local threshold for assessments set out in (7) below. The impact assessment must demonstrate that the proposals will not have a significant adverse impact on the centres, or planned investment within them.

7. Impact Assessments must be submitted for proposals that comprise 280 square metres or more gross retail floorspace outside of a Primary

[96] Main town centres uses are defined as: Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); banks; professional services; offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities) (NPPF, 2026)

Shopping Area, or 280 square metres gross leisure floorspace outside of a Town or District Centre.

Local provision for day-to-day needs

8. The policy does not preclude the provision of small-scale, local shops outside of designated town and district centres where they serve the day-to-day needs of local communities in accordance with Policy HWB3, including rural communities in accordance with SS4. Such proposals will still be subject to the sequential and (where relevant) impact tests, in order to demonstrate that they are serving an immediate local catchment. The sequential test does not apply to applications for small scale rural offices or other small scale rural development.

Key evidence and/or guidance

- Rother Retail and Main Town Centre Uses Study (2023), Update and Addendum (2026)
- Rother Housing and Economic Land Availability Assessment (2026)
- Rother Settlement Study (2024)

4.36 National planning policy sets out that the Local Plan should be informed by a strategy for town centres in the area, to ensure that the full range of potential needs and opportunities for development is considered. It also directs the plan to set out the hierarchy of centres, and any areas within them where specific policies on the nature and scale of development apply. This policy responds to these requirements and supports the overall economic development strategy in Policy ECO1.

4.37 The Council's evidence on retail, leisure and town centres is informed by the Rother Retail and Main Town Centre Uses (RMTCU) Study (2023, updated 2026). The study assesses current provision, expenditure patterns, future retail and leisure needs, and the role and performance of the district's centres. Its findings provide the evidence base for the Local Plan's approach to retail, leisure and town centre development, helping to ensure that policies maintain and enhance the vitality and viability of Rother's centres throughout the Plan period.

Town Centres

4.38 Policy ECO6 defines a network and hierarchy of centres in the district, to enable these locations to be prioritised for town centre uses. Town Centre and Primary Shopping Area designations help to deliver this objective through the sequential test, which requires that applications for main town centre uses to be directed first to designated

town centre, followed by edge of centre locations[97], before other locations may be permitted.

4.39 High streets are continuing to evolve in response to changing retail patterns, through a diversification of uses within town centres away from a traditional focus on retail, through a broader mix of leisure, entertainment, cultural, community, office uses. The Rother RMTCU Study highlights that residential growth in town centres is anticipated to play a key regenerative role, and especially where this involves mixed tenure housing and housing for different age groups, which alongside the growth of education, leisure, recreation, cultural and community uses, will facilitate more balanced, vibrant and resilient centres.

4.40 Changes to the Use Classes Order in 2020 and the introduction of permitted development rights allowing certain commercial premisses to change to residential use have increased flexibility and supported the adaption of centres to changing economic conditions. However, they also reduce the ability of the planning system to manage the precise mix of uses within centres. Consequently, the Council's wider strategy also includes supporting the vitality and viability of centres through initiatives such as the Bexhill-on-Sea Place Plan, which promotes a long-term programme of regeneration, public realm improvements, economic development and community investment. An example through which the Council may directly intervene to reduce vacancies across town centres is the possible use of High Street Rental Auctions (HSRA)[98]. This would enable the Council to require landlords to rent out persistently vacant commercial properties to new tenants such as local businesses or community groups, through auctioned leases. This addresses properties being left vacant over long period.

4.41 Temporary or meanwhile uses can play an important role in maintaining activity, footfall and investment confidence within town and district centres by bringing vacant shops, buildings and sites back into productive use. Such uses may include pop-up retail, cultural and creative activities, community uses, food and beverage offers, markets and flexible workspaces. Proposals for temporary uses in town and district centres will be supported in accordance with Policy ECO5.Bexhill, Rye and Battle Town Centres will continue to perform the role of the district's principal centres, while Sidley and Little Common fulfil important local service functions. Primary Shopping Areas are designated within Bexhill, Rye and Battle Town Centres where retail uses are concentrated. These designations

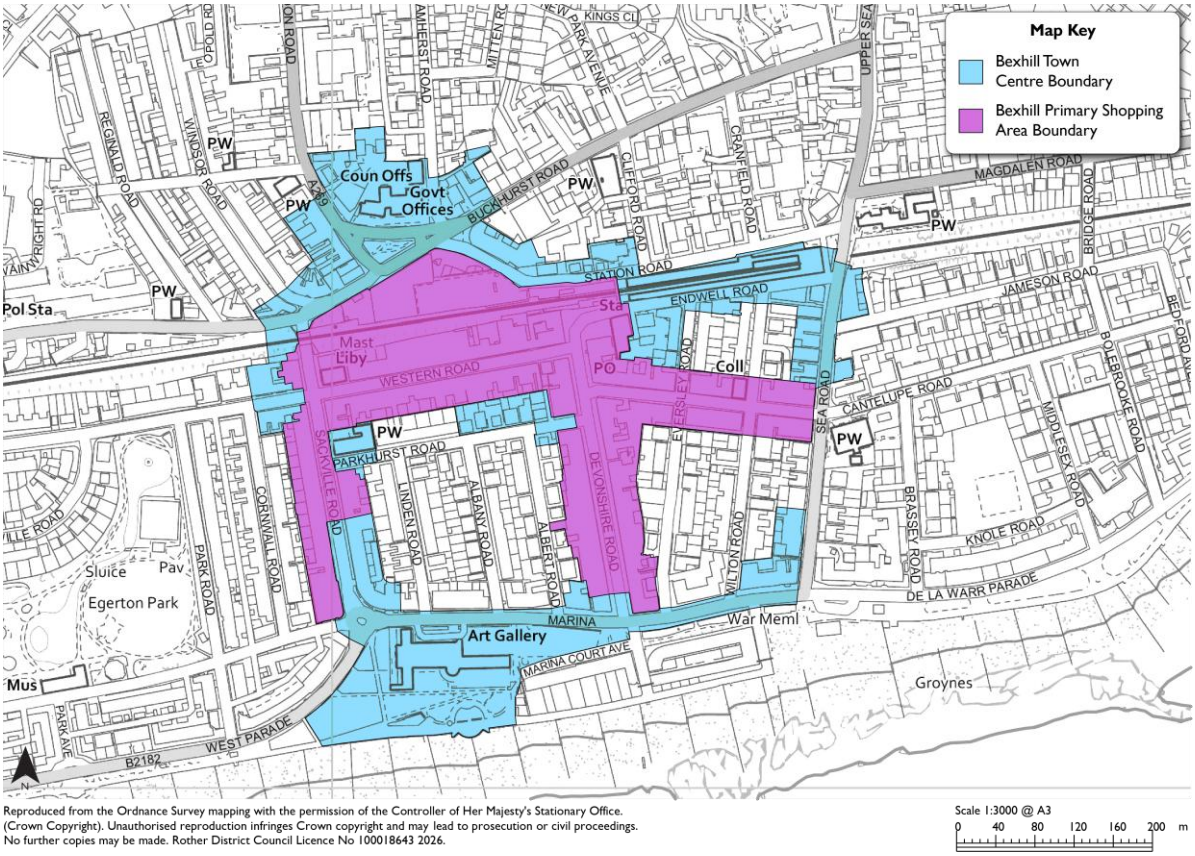
[97] NPPF December 2023 definition: a location within 300 metres of a town centre boundary.
[98] A power for Local Authorities introduced through the Levelling Up and Regeneration Act 2023

reflect the strategic importance of these areas as the principal retail cores within the district's network of centres.

4.42 The Town Centre, District Centre and Primary Shopping Area boundaries designated by Policy ECO6 are shown in Figure 4.3 to Figure 4.7 below.

Bexhill Town Centre

Figure 4.3: Bexhill Town Centre and Bexhill Primary Shopping Area



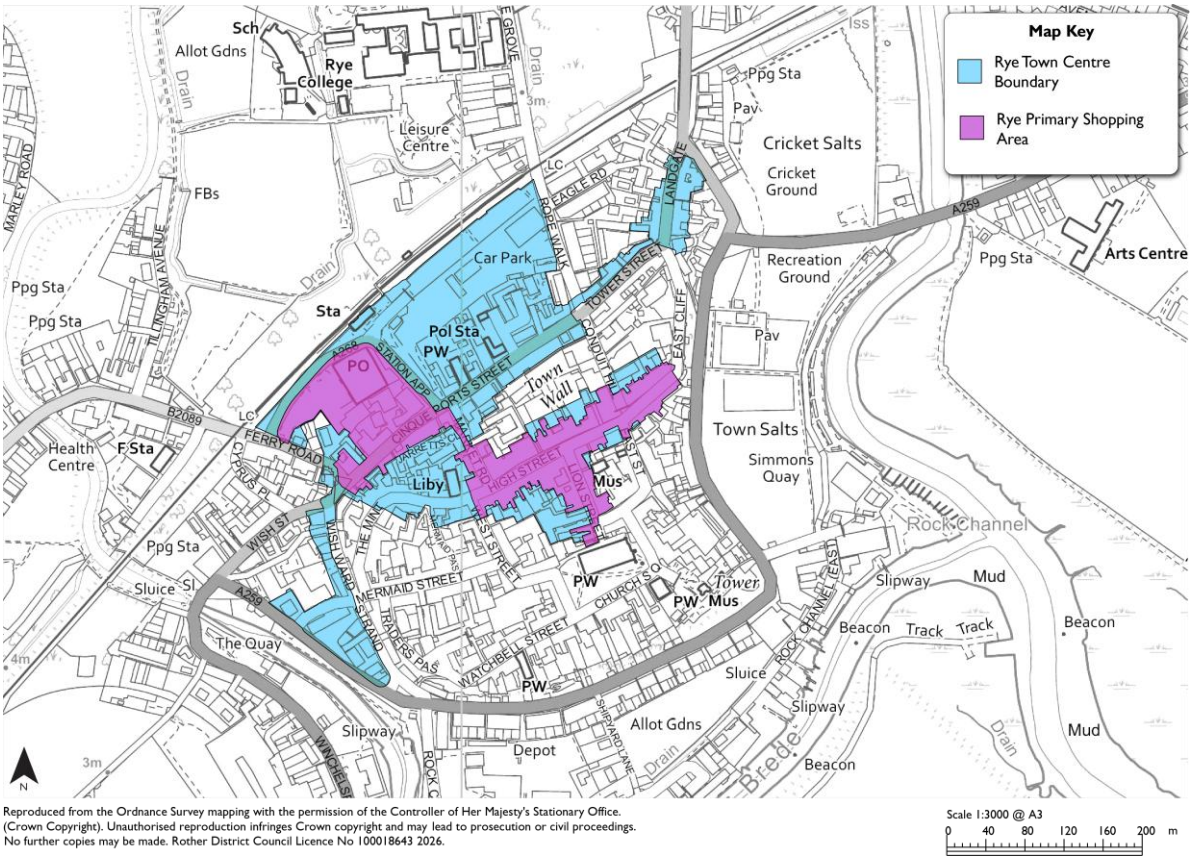
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4.43 Bexhill-on-Sea Town Centre is the district's principal commercial, service, leisure and cultural centre, benefiting from its Edwardian coastal setting, strong independent business sector and significant cultural assets, particularly the De La Warr Pavilion. The centre has experienced a decline in comparison retailing and increased vacancies in some areas, although independent business areas continue to perform comparatively well and support the centre's distinctiveness and resilience. The leisure offer remains heavily focused on food and beverage uses, with limited growth overall and ongoing gaps in gym provision, evening economy depth, and visitor accommodation.

4.44 The town is the focus of significant regeneration and investment, including the Bexhill Place Plan, Pride in Place funding and the planned regeneration of the De La Warr Pavilion. Together, these initiatives will improve public spaces, connectivity, cultural facilities and the re-use of vacant buildings, helping to strengthen Bexhill's role as a more diverse, accessible and experience-led destination, supporting its vitality, visitor economy and long-term resilience.

Rye Town Centre

Figure 4.4: Rye Town Centre and Rye Primary Shopping Area

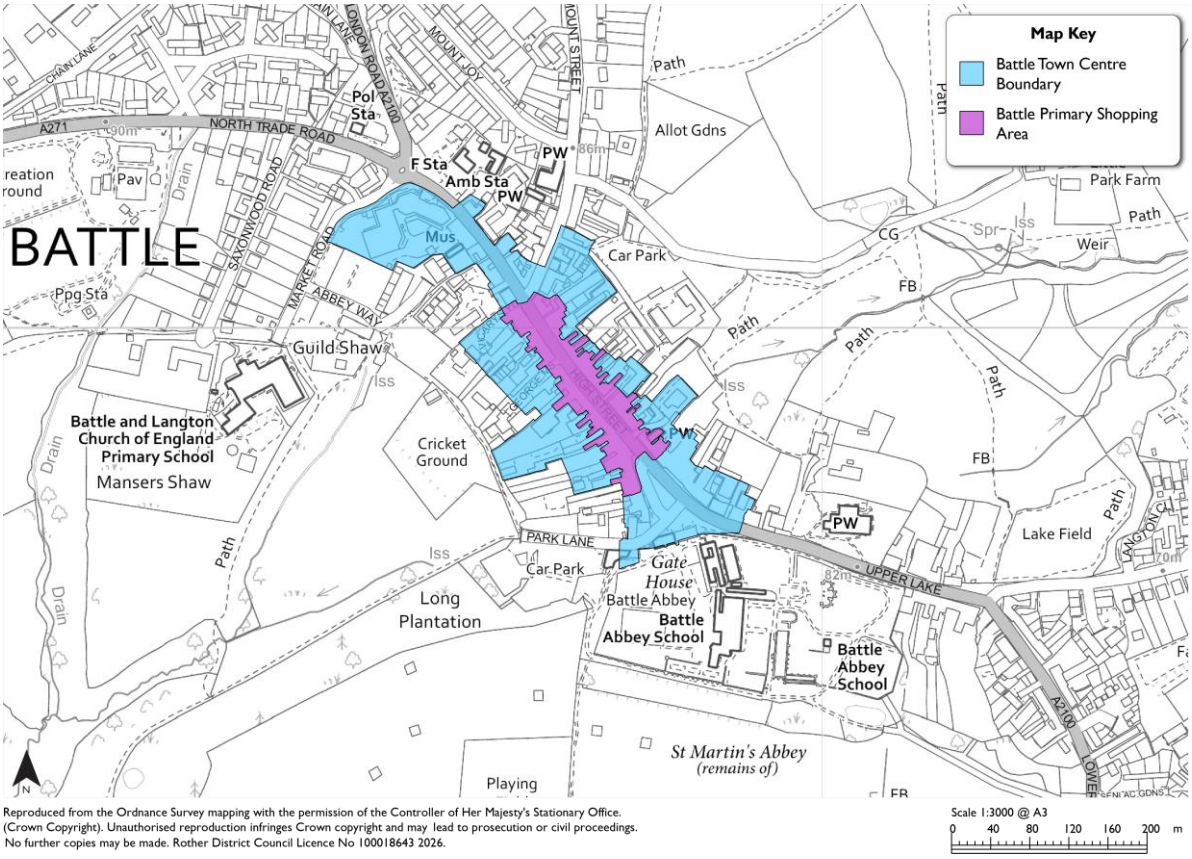


4.45 Rye is a historic citadel and tourism-led market town whose medieval character, conservation status and heritage assets are central to its identity and economic role. The town's retail and service offer is strongly underpinned by independent businesses, which account for 97% of all outlets. Rye Town Centre remains stable and resilient, with growth in convenience, leisure, restaurant and visitor accommodation uses reinforcing its role as a destination and reflecting wider trends towards more service- and experience-led centres, although gaps remain in areas such as fitness and broader cultural provision.

4.46 Vacancy levels have fallen to around 9%, indicating healthy demand, although some vacancies remain concentrated along parts of the High Street. While recent investment has largely been focused on business support rather than major development, there remains a strong commitment to coordinated action to support the town centre's long-term vitality and visitor economy.

Battle Town Centre

Figure 4.5: Battle Town Centre and Battle Primary Shopping Area



4.47 Battle is the smallest of the district's town centres, functioning as a historic market town serving both local residents and visitors attracted by its heritage assets, particularly Battle Abbey and being the site of the famous 1066 Battlefield. Located within the High Weald National Landscape, the town centre is defined by its historic character, strong independent business sector and heritage-based tourism role.

4.48 The centre remains stable, with only a modest decline in commercial units since 2021 and some growth in leisure uses, particularly bars and restaurants, although there remain gaps in provision such as the absence of modern fitness and leisure facilities. Vacancy levels remain relatively low at 9.6%, indicating healthy occupancy, although some vacancies are concentrated along the High Street. Recent investment has focused on heritage-led improvements, with the Blackfriars development expected to increase footfall and support the town's long-term vitality, tourism offer and resilience.

Sidley and Little Common District Centres

4.49 Sidley and Little Common are designated as District Centres within the hierarchy established by Policy ECO6. While smaller in scale than the District's Town Centres, they

perform an important role in meeting the day-to-day shopping and service needs of their local catchments and contribute to the creation of sustainable communities by supporting access to local facilities close to where people live. Together with the Town Centres, they form part of the district's network of centres and support the application of the sequential approach to town centre development. The designated District Centre boundaries are shown in Figure 4.6 and Figure 4.7 below.

Figure 4.6: Sidley District Centre

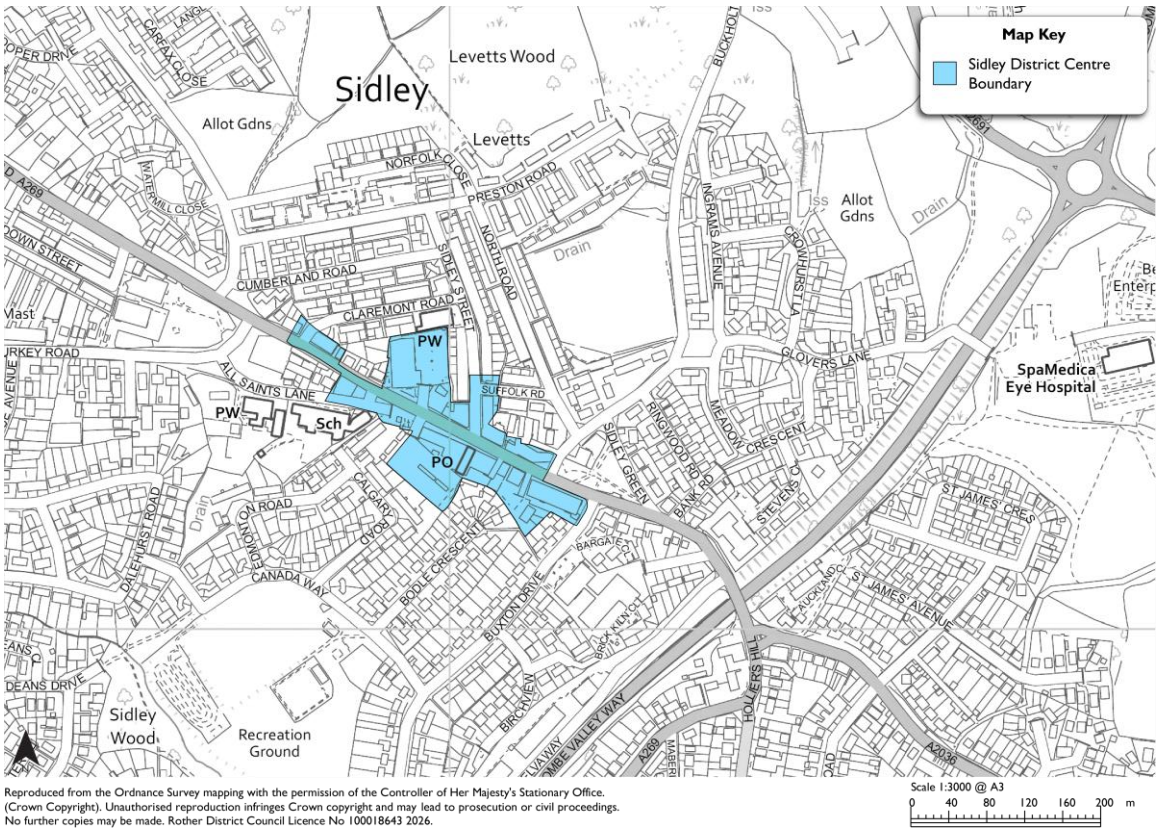
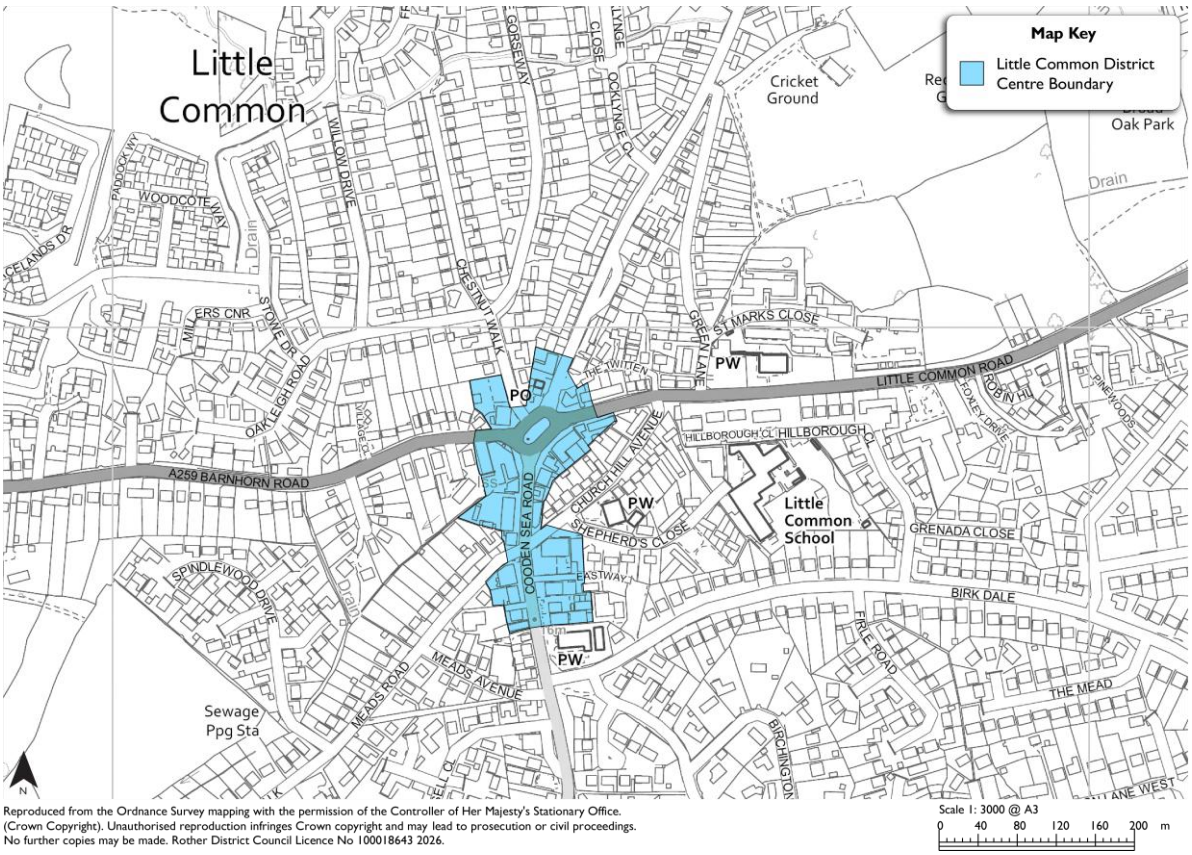


Figure 4.7: Little Common District Centre



The wider district

4.50 No other areas outside of the towns of Bexhill, Rye or Battle have the scale, function or concentration of town centre uses necessary to justify designation as a District Centre. The district's village centres continue to serve more day-to-day needs and are often served by a convenience store and a small number of other retail uses and services. Such uses will be supported to maintain the vitality of rural communities.

4.51 Ravenside Retail Park in Bexhill functions as Rother's principal out of Centre retail destination and an important component of the district's overall retail offer. However, it is recognised that the retail park attracts a significantly greater share of comparison expenditure than Bexhill Town Centre. Any additional out of Centre retail development has the potential to undermine investment and expenditure retention within the district's centres. Proposals at Ravenside, and more so any proposals for new edge and out of Centre retail, would therefore need to be carefully considered in accordance with the sequential test and the Impact Assessment.

4.52 Small-scale local provision for local retail, leisure or community facilities may be acceptable in other locations, where these support the wider development strategy and assist in creating sustainable neighbourhoods. Proposals will be expected to demonstrate

that they are appropriate in scale and function and do not adversely affect the vitality and viability of existing centres. In accordance with national planning policy, the sequential test does not apply to applications for small scale rural offices or other small scale rural development.

Impact assessments

4.53 In accordance with national planning policy, proposals for retail and leisure uses located outside town centres should be accompanied by an impact assessment to consider the effect on town centre investment, vitality and viability. Local Plans may identify locally set floorspace thresholds, proposals above which a Retail and Leisure Impact Assessments will be required. In contrast with the national 'default' floorspace threshold of 2,500 sqm, Rother's RMTCU Study identifies an appropriate floorspace threshold of 280 sqm. This is based on current market trends that see the main grocery operators focusing on smaller convenience stores which tend to have a minimum gross floorspace of between 280 sqm and 372 sqm. Stores below 280sqm are exempt from Sunday trading restrictions, while those above 280 sqm are defined as 'large shops' according to the Sunday Trading Act. The Act intends to protect smaller stores from competition from the larger supermarket operators. It is therefore considered that stores of over 280 sqm are unlikely to be a purely local facility and may draw trade from outside their immediate area and potentially impact on existing stores and centres.

Need for floorspace for retail and leisure uses

4.54 Shopping habits nationally have changed significantly in recent years. The growth in online shopping has diversified the retail market away from 'physical shopping'. This trend is commonly measured through Special Forms of Trading (SFT), which includes internet shopping and other forms of non-store retailing. SFT's share of total retail sales increased from around 5% in 2006 to approximately 28% in 2026 and is forecast to rise further to 37.8% by 2041. This has particularly affected comparison goods (including goods such as clothing, electrical goods and household items). Convenience goods retailing, which primarily relates to food and grocery shopping, has generally been more resilient to the growth of online shopping. Nevertheless, the online market share for convenience goods has risen to 18% in 2026 and is forecast to rise to 24.9% by 2041.

4.55 This, combined with the effect of a difficult economic period, changing retailer business models and increasing operating costs, mean that expenditure growth does not necessarily generate a corresponding need for additional floorspace. These factors have

had major implications for retailers' space requirements and are changing the retail landscape of our towns and cities.

Retail

4.56 The Rother RMTCU Study, Update and Addendum (2026) considered the need for new convenience retail floorspace during the plan period. It found that district-wide, there is an over capacity, due mainly to existing edge and out of centre capacity. If this location type is discounted, the Study found a very small need (equivalent to approximately one small convenience store) across town and district centres, villages and local shops combined. Given this, there is no strategic need to identify land through the Local Plan for additional future growth for new convenience retail floorspace.

4.57 Comparison goods retail expenditure within the district is forecast to grow by approximately 30% by 2042, however the RMTCU Study forecasts either nil, very slight, or negative capacity for Rother throughout the Plan period. This is due to the continued growth of online retailing as well as the expectation that this growth will largely be accommodated through the optimisation of existing retail floorspace. In relation to retail overall, the Study concludes that the Council should plan for less rather than more retail floorspace, with a focus on repurposing and diversifying existing centres rather than allocating additional retail land.

4.58 However, the capacity forecasts should not be viewed in isolation. Whilst the evidence does not justify allocating sites for additional retail floorspace, market demand may still give rise to viable retail proposals in the Plan period. Therefore, the Local Plan does not preclude the consideration of opportunities that could improve the retail offer, particularly proposals which could improve expenditure retention from competing locations outside the district. Development will be required to prioritise town and district centres in line with national planning policy and Policy ECO6, with proposals in other locations being subject to the sequential test and Impact Assessment requirements set out.

4.59 It should be noted that planning legislation[99] provides that a change of use of a building from a use falling within Class E (commercial, business and service – including retail) to use Class C3 (dwellinghouses) is "permitted development" providing it meets certain tests set out in legislation, and subject to an application for Prior Approval. This means

[99] The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended)

the Council cannot resist such changes of use in principle, including in designated town centres, although the legislation does require consideration of impacts of such proposals on the character and sustainability of conservation areas. Small local shops selling essential goods, however, are treated differently in legislation, being within use Class F2(a)[100] and are not subject to the same permitted development rights. Proposals involving the loss of a shop within use Class F2 will be resisted in line with Policy ECO4.

Leisure

4.60 Leisure forms a diverse range of use categories, and forecasting for new leisure uses is more problematic than for retailing, being highly complex and dynamic. Consequently, no overall floorspace need is identified by the RMTCU Study. However, leisure expenditure is forecast to increase over the Plan period, by around 30.8% by 2042, with the strongest growth expected to be driven by food and beverage expenditure, followed by cultural services. This provides opportunities to strengthen the role of town centres and support the visitor economy.

4.61 Restaurants, cafes, bars and similar uses play an important role in supporting town centre vitality, generating linked trips and increasing time spent in the centre. Food and beverage uses within town centres, including as part of mixed-use developments, will be supported as part of a "town centre first" approach. Ultimately however, specific sites will be decided by the market.

4.62 In terms of theatre, music and the performing arts, improvements to the De La Warr Pavilion in Bexhill, have the potential to strengthen the district's role as a cultural destination. To this end, Policy BX2: Bexhill Cultural Area, identifies Bexhill town centre as the focal point for arts, culture and tourism activities, and seeks to protect significant cultural uses. This will in turn help to stimulate trade to other businesses within the leisure sector that would benefit from linked trade, such as food and beverage outlets and potentially increase demand for overnight visitor accommodation.

4.63 The RMTCU Study also identifies a demand for an improved active leisure and fitness provision within the district. While the existing leisure offer generally performs well in meeting day-to-day needs and supporting visitor activity, there remain gaps in provision, particularly in relation to branded gyms, larger scale leisure attractions and family entertainments venues. These gaps contribute to expenditure leakage to competing

[100] Defined as: shops (mostly) selling essential goods, including food, where the shop's premises do not exceed 280 square metres and there is no other such facility within 1000 metres.

centres such as Hastings and Eastbourne. Opportunities to address these deficiencies are constrained by market factors, including viability, operator requirements, the scale of the local catchment and the limited presence of anchor attractions such as major cinemas. Consequently, future opportunities are likely to focus on incremental improvements to existing provision, including strengthening the food and beverage offer, supporting cultural facilities and accommodating smaller-scale leisure operators. More significant leisure developments are likely to remain dependent on market demand, viability considerations and the ability to attract investment.

4.64 Given the complexity of this sector, as well as the problematic nature of forecasting for future leisure capacity, the Local Plan supports a flexible and positive approach to leisure development, with proposals assessed against the sequential test and Impact Assessment.

Policy ECO7: Tourism Activities, Facilities & Accommodation

Status	Strategic
Priorities	Green to the Core, Live Well Locally, Thriving Local Economy
Strategic Objectives	1, 4, 6, 9

1. Development proposals relating to tourism activities, facilities and accommodation will be supported where they:

    a. Provide for the enhancement of existing attractions or accommodation to meet customer expectations;

    b. Support enjoyment of the district's Green and Blue Infrastructure (GBI) network, including active use along the coast, consistent with environmental and amenity factors;

    c. Promote the development of markets for local produce, particularly that which supports land-based industries and cultural assets;

    d. Increase the supply of quality serviced and self-catering accommodation;

    e. Demonstrate that due regard has been given to accessibility by public and sustainable transport; and

f. If development is located in the countryside, it is of an appropriate scale and does not adversely impact on the landscape character and it accords with other relevant Local Plan policies including ECO2 (New Employment Development) and ECO9 (Agricultural Development & Foresty).

2. Land or premises currently (or last) in use for tourism activity or as a tourist attraction, or visitor accommodation, must be retained in such use unless it is demonstrated that there is no reasonable prospect of its continued use for tourism purposes. The approach to demonstrating if there is no reasonable prospect of continued use is set out in Policy ECO4 (Retention of Sites of Economic or Community Value).

3. For visitor accommodation, appropriate controls will be put in place that restrict occupancy to that for holiday/leisure purposes, whilst not unduly restricting operators from extending their season (subject to other Local Plan considerations).

4. Proposals for holiday accommodation that result in the loss of a dwelling will be considered on a case-by-case basis, having regard to the desirability of retaining the dwelling, the suitability of the site for tourism use, and the economic benefits of the proposal. Within Rye, Rye Foreign, Icklesham and Camber parishes, proposals for holiday accommodation that result in the loss of a dwelling will not be supported.

5. Proposals within the strategy area of the Dungeness Complex Sustainable Access and Recreation Management Strategy (SARMS) must comply with Policy ENV11 (Sustainable Access and Recreation Management Strategy).

Key evidence and/or guidance

- Hastings and Rother Tourism and Visitor Accommodation Study (2026)
- Dungeness Complex Sustainable Access and Recreation Management Strategy

4.65 This policy sets out the Plan's overarching strategy for tourism development, including visitor accommodation, which forms an integral part of the economic development strategy set out in Policy ECO1 (Supporting a Thriving Local Economy).

Tourism in Rother

4.66 Given its broad access to the coast, its beautiful and often remote landscapes, its unrivalled historic assets and settlements, and its relative proximity to London, it is no surprise that the visitor economy is a fundamental component of the district's economy.

The Local Plan strikes a balance between supporting tourism growth and protecting the environment. Consequently, while Policy ECO7 is supportive of tourism proposals, the overall approach is selective, being focused on quality accommodation and sensitive development.

4.67 Most visits to the district are day trips (with 5.21 million being recorded in 2022), although there is also a considerable demand for both serviced and self-catered accommodation. It is envisaged that the impacts of climate change, including the growing unsustainability of overseas transit, will equate to a steady trend towards domestic 'staycation' holidaying. This represents a growing opportunity for Rother to diversify its tourism offer, extending beyond traditional day trips towards an increasing emphasis on multi-day visits, as day visitors yield lower revenue per person than those staying overnight[101]. It is therefore essential for its tourism sector that Local Plan policy promotes a broad range of visitor accommodation, including higher-quality, sustainable accommodation, both in urban and rural areas.

4.68 Nationally, demands for different forms of tourist accommodation have changed significantly in recent years and this is reflected in Rother. The development of new online platforms has led to a rise in the number of short-term holidays lets in many areas, particularly coastal towns. This forms a major part of the structural shift in the last decade away from serviced accommodation like hotels towards non-serviced, typically self-catered, accommodation, also influenced to an extent by the Covid-19 pandemic.

4.69 The three main towns of Bexhill, Battle and Rye play important roles in the visitor economy. Rother's villages are also popular tourist destinations, and tourism is an influential factor in the diversification of the rural economy, including the growing market for local produce and viticulture. Of particular significance is the coastal resort of Camber which has long been a popular tourist destination for people from across the wider region, but which is sensitive, environmentally, being close to protected habitats sites and areas at risk of flooding.

Tourism Focus Areas

4.70 The Rother and Hastings Tourism and Visitor Accommodation (TVA) Study (2026)[102] identifies four strategic "tourism focus areas" within Rother district, where there are high

[101] Hastings and Rother Tourism and Visitor Accommodation Study 2026, Tomorrow's Tourism
[102] Appendix VII – Tourism Focus Areas – Rother

concentrations of visitor accommodation. A focused approach to proposals in these areas is recommended, taking into account existing accommodation stock. The four areas are:

- Rye and Winchelsea: including Rye town, Rye Harbour, Winchelsea and Winchelsea Beach;
- Eastern Rother: with a focus on Camber;
- Central Bexhill: Collington, Central and Sackville wards; and
- Battle: with a focus on both the town and the surrounding area.

4.71 Within all of these areas, the TVA study identifies needs for:

- Modern hotels and bed & breakfast establishments;
- Purpose-built self-catering accommodation (that does not result in the loss of existing dwellings);
- Hybrid forms of accommodation, which comprise some serviced elements within a largely self-catered offer.
- Outside of the Bexhill area, there is also support for camping and glamping sites, and these are further considered in Policy ECO8 (Holiday Sites & Accommodation).

4.72 Evidence[103] finds that in Camber, Rye, Rye Foreign and Icklesham parishes, there are high numbers of short-term holiday lets and second homes which has, over time, resulted in the loss of dwellings available for residential use. This must be considered in the context of poor housing affordability and a significant unmet affordable housing need throughout the district. As such, any proposals involving a loss of dwellings to holiday accommodation is not supported in these areas[104]. This does not impact on proposals for new purpose-built holiday accommodation, and the TVA study identifies support for holiday parks in Camber in particular. Any proposals in these areas will need to take account of the

[103] Recommendations of the Airbnb Task and Finish Group, Cabinet report, Rother District Council, 16 June 2025.
[104] This only applies to development requiring planning permission.

sensitive environmental setting, with particular regard to flood risks and the proximity of the Dungeness complex of protected habitats sites.

4.73 Proposals for quality hotels in the central and coastal area of Bexhill will be particularly supported, when these are compliant with heritage and amenity considerations. The TVA study identifies "aparthotels" as an opportunity in Bexhill, these are serviced apartments that run on a hotel booking system. The Retail and Main Town Centre Uses Study (Update 2026) also identifies a need for additional hotel accommodation in Bexhill town centre. It finds hotels to be particularly under-represented, and that the current lack of choice is likely to constrain opportunities to develop the town's overnight stay visitor economy. See also Policy BX2 (Bexhill Cultural Area).

4.74 The rural offer across much of the district has been attractive for smaller-scale tourism development over the last decade and this is likely to continue, as consumers continue to seek outdoors experiences and rural accommodation formats. It is acknowledged that some small rural sites will be less able to offer access via a range of means of transport. However, in all cases opportunities for sustainable transport should be maximised as far as possible, with EV charging points provided where the only travel option is the private car but the site is otherwise acceptable. Rural sites are, however, often well placed to include biodiversity enhancements as part of development, and these will be required in line with Local Plan policy.

Loss of tourism uses

4.75 There can sometimes be commercial pressures for tourism facilities, in particular visitor accommodation, to change to higher value uses, but such losses have the potential to adversely impact the tourism economy. For this reason, the policy restricts the loss of tourism activities, attractions and visitor accommodation, unless it can be demonstrated that there is no reasonable prospect of its continued use, subject to the requirements set out in Policy DEV4. Nevertheless, it is recognised there may be some relatively low-quality serviced accommodation that is no longer suited to the visitor market, and in some limited instances a change of use may be accepted. However, such proposals will be subject to consideration under policy DEV4 and also against a range of quality measures such as independent customer reviews, trading standards reports, environmental health reports and industry insight, to determine whether the site is genuinely unsuitable.

4.76 Additionally, new visitor accommodation will be subject to appropriate controls through a condition(s) following the grant of planning permission that restricts occupancy to holiday use and prevents inappropriate use as a dwelling.

Policy ECO8: Holiday Sites and Accommodation

Status	Non-strategic
Priorities	Live Well Locally, Thriving Local Economy
Strategic Objectives	4, 6

1. All proposals for new holiday accommodation must be appropriately located and designed, in line with other Local Plan policies. Proposals for new enterprises must be supported by a business case to demonstrate the proposed use will be viable.

2. Proposals for static caravan, chalet or holiday lodge accommodation must also:

    a. Be of a modest scale for low-key, high-quality accommodation that requires only limited ancillary facilities; or

    b. Comprise a limited amount of accommodation to enhance an existing countryside recreational use and be wholly ancillary to that use; or

    c. Where within an existing site, either:

        i. Result in a demonstrable improvement to the appearance and quality of accommodation of that site, or

        ii. Be a limited extension of that site to a natural boundary and make a demonstrable improvement to the overall appearance and quality of accommodation.

3. Touring caravan or tented camping proposals should be of a small scale appropriate to the area. Where the temporary use of land is permitted, any ancillary facilities necessary to serve the site will only be permitted on a similar temporary basis or, if of a permanent nature, where they are compatible with the local character of the area.

4. For all proposals, in order to prevent the residential use of holiday accommodation, their use will be restricted to holiday/leisure purposes and will be subject to occupancy conditions relevant to the site.

Key evidence and/or guidance

- Hastings and Rother Tourism and Visitor Accommodation Study (2026)

4.77 The overarching policy approach set through Policy ECO7 is to support tourism activities and facilities, including by increasing the supply of quality serviced and self-catering accommodation, while ensuring compatibility with other policies, especially those that protect environmental character (including landscape character) and amenities.

4.78 This policy is specific to holiday accommodation, including caravan and camping sites, which make up a significant and dynamic part of the tourism sector, being historically concentrated on sites near the coast but now taking more varied forms and being more dispersed. This includes the continued growth of self-catered accommodation, particularly advertised through online channels, which means that there are many different types of holiday accommodation and sites present in the district that all help to support the wider visitor economy.

4.79 It is important that new visitor accommodation positively adds to the tourism economy and is viable into the longer term. Therefore, proposals for new holiday accommodation will need to be supported by a business case demonstrating the development will be viable. This business case will normally be independently verified at the applicant's expense. This is essentially to safeguard against poorly thought-out schemes which could quickly become unsustainable and result in a demand for an unsuitable change of use, for example to residential use in a countryside location.

4.80 It is acknowledged that different forms of holiday accommodation will have specific requirements. In all instances, however, care must be taken in the siting, scale and form development to prevent adverse impacts on the special character of the countryside, particularly on an otherwise undeveloped coastline or in the High Weald National Landscape. In addition, coastal areas are also most often vulnerable to flood risk. Accommodation in more urban areas will equally be required to consider the character of the area, any heritage constraints, and the amenity of neighbouring properties. Given the district's environmental constraints, the provision of new large static caravan or chalet sites would be most unlikely to be satisfactorily accommodated locally.

4.81 The upgrading of existing holiday sites, for example replacing static caravans with chalet or lodge-style units (which are often still legally classed as caravans), can be positive in terms of better meeting customer needs so long as the impact on the wider landscape is acceptable. This may, exceptionally, involve a sensitive, limited expansion of a site.

4.82 Changing leisure patterns bring other demands, including for short stay breaks in low key, high quality, self-catering accommodation. Such accommodation may take the form of small lodges or more unusual structures such as shepherd huts or tree houses. Where a scheme involves limited ancillary facilities and generates minimal traffic, as well as not detracting from its setting or harming landscape character, these may also be accommodated. In addition, visitor accommodation serving other countryside uses, for example existing fishing lakes or equestrian facilities, may also be considered where any new buildings can be assimilated into the landscape (including in respect of dark night skies) and the accommodation is wholly ancillary to and an integral part of the principal leisure use.

4.83 The siting of seasonal touring caravan and camping pitches for holiday use should be visually contained within the rural landscape, not adversely impact on the particular characteristics of the High Weald NL or sensitive ecological areas and have no unacceptable impacts in terms of lighting, traffic, access and other environmental impacts.

4.84 Proposals with the potential to generate increased recreational pressure on sensitive habitats including the Dungeness Complex[105] of Habitats Sites will need careful consideration. It may be necessary to restrict the scale of development and length of season and require the provision of alternative recreational space within the site, and the provision of guidance about the sensitivity of relevant Habitats Sites.

4.85 Some significant areas of the district are at risk from coastal and/or fluvial flooding. Proposals for both permanent and seasonal accommodation, the provision/extension of sites, or extension of occupancy periods, will not be supported in areas of high flood risk (from any source) unless a Flood Risk Assessment, undertaken in accordance with national planning policy, has demonstrated the development can be satisfactorily accommodated. Proposals should have regard to the likely impact of hard-standings and other impermeable surface treatments on flooding, and also the impacts of climate change which could increase flood risks in the future.

4.86 While there has been a trend to move away from seasonal controls on permanent sites to allow all-year-round use, it is essential that holiday sites remain available as tourist accommodation and do not develop, or become seen, as low-cost homes to be purchased or occupied by persons without a permanent residence elsewhere. As well as

[105] This comprises the Dungeness, Romney Marsh and Rye Bay Special Protection Area (SPA) and Ramsar site, and the Dungeness Special Area of Conservation (SAC).

the loss to the tourism economy, permanent residential occupation has infrastructure impacts, notably on highways and local services, including schools.

4.87 On sites with static units, established practice is to impose conditions on any new permissions to the effect that any unit is only occupied for holiday purposes and not as any person's sole or main place of residence; and also, that the owners/operators of the site should maintain an up-to-date register of the names and main home addresses of all occupiers of the units.

4.88 Seasonal sites will be limited to holiday use, and the occupation period will usually be restricted to prevent use all year round. This would normally be between April and October but may be longer depending on the type and scale of accommodation. This will be assessed on a case-by-case basis.

4.89 In line with the Local Plan's Live Well Locally priority, proposals should demonstrate that they have had sufficient regard to matters of sustainability, including sustainable and active transport where possible, in accordance with other Local Plan policies. This aligns with a wider national trend of 85% of travellers saying that more sustainable travel is important to them[106].

Policy ECO9: Agricultural Development & Forestry

Status	Strategic
Priorities	Green to the Core, Thriving Local Economy
Strategic Objectives	3, 4, 6, 8

1. Development proposals for, or directly associated with, agriculture and forestry (including new buildings, operational facilities and the conversion, replacement or extension of existing sites and premises) must be necessary to support the agricultural/forestry uses on site.

2. Where (1) above is satisfied, proposals will be supported subject to other Plan policies and where the siting, design and materials of the development respond positively to the local landscape character and:

    a. Wherever possible, they re-use or are within the footprint of an existing agricultural/forestry building, or are otherwise well-related physically and functionally to existing buildings associated with the agricultural or forestry activity, unless it can be demonstrated that

[106] Hastings and Rother Tourism and Visitor Accommodation Study 2026, Tomorrow's Tourism

there are circumstances that require an alternative or more isolated location;

b. Opportunities are taken to remove existing redundant buildings within the application site, where this would enhance landscape character.

New Agricultural Tracks

3. Development proposals for new or improved access tracks for agriculture or forestry will be supported where:

a. They are essential for the sustainable management of the land;

b. It has been demonstrated that it is not feasible to use existing access tracks;

c. They are the minimum scale and extent necessary;

d. The layout and design conserves and where possible enhances local landscape character, which includes using landscape-appropriate surface materials, being in accordance with local geology and fitting within the pattern of existing contours and vegetation;

e. They protect and enhance drainage patterns; and

f. Where practicable and appropriate, the track is opened as a path for permissive public usage or as Public Right of Way and should be accessible from the existing Public Rights of Way network.

Key evidence and/or guidance

- East Sussex 2050 Economic Prosperity Strategy
- High Weald AONB Management Plan 2024-2029

4.90 Rother is a predominantly rural district, and the primary economic function of the countryside is agriculture and the production of food; with some 70% of the area of Rother district being classed as farmed land by DEFRA. Rother's agricultural land is of mixed quality; mostly Grade 3 but with significant areas of higher quality Grade 2 towards the east of the district along the Brede Valley and East Guldeford Level.

4.91 It is important to recognise that with 83% of the district being within the High Weald NL, the form of agriculture within the district is generally less intensive in nature compared to other rural areas. This is reflected in the High Weald's medieval field pattern consisting of small, irregularly shaped fields bounded by hedgerows and woodlands.

4.92 The High Weald Management Plan emphasises that certain forms of agriculture are an integral part of the maintenance of the High Weald's medieval landscape, especially where the production of food is intended for local markets. Changes in agricultural practices during the 20th century saw a decline in traditional land and woodland management, with a consequent decline in skills in environmentally sensitive land management. Maintaining and developing such skills and practices, offers opportunities for local employment and has a vital part to play in maintaining the district's distinct landscape character, especially in the High Weald. Key threats identified by the Management Plan include the fragmentation of farm holdings due to an increase in non-farming land ownership, the loss of agricultural workforce, and a reduction in livestock grazing and the associated loss of farm infrastructure, including the loss of livestock markets and abattoirs, and the degradation of pasture and soils.

4.93 All development located within or having a potential impact on the National Landscape will need have regard to the HWNL Management Plan in accordance with Policy LAN2 (High Weald National Landscape).

4.94 New agricultural buildings are often permitted development, not requiring planning permission, subject to requirements that the farm holding is over a certain size, with limitations for building size also relevant. In Rother, where farm sizes are smaller than national averages, new agricultural buildings may therefore be more likely to require planning permission.

4.95 Farming is often at the forefront of dealing with the effects of the climate crisis. including increased risks of drought and water scarcity. In response, farms may require infrastructure such as on-farm water storage reservoirs to improve resilience and support food production. Where appropriately located and designed, such development can help agricultural enterprises adapt to changing climatic conditions and will be supported. On-farm water reservoirs would require a licence from the Environment Agency for the abstraction of water.

4.96 In addition, modern farming practices often require new agricultural buildings to meet specific needs. It is also recognised that new forms of agriculture, including viticulture and beer production, are becoming increasingly important within the rural economy, with local beer production in particular being marketed in local urban areas.

4.97 The policy establishes the approach for dealing with planning applications for development needed to address the specific requirements of agriculture within Rother

that does not constitute Permitted Development. To ensure viable farming industries, these will be supported in principle, though whilst the size and mass of such buildings is inevitably dictated by their function, care is still needed in their siting, design and materials, to minimise the visual impact on the landscape character of the countryside.

4.98 The viability of farming relies on a range of supporting infrastructure within the food supply chain. The Council recognises the importance of local abattoirs and other agricultural processing facilities in supporting livestock farming, animal welfare, local food production and the rural economy, particularly in light of the prevalence of local, organic meat production in the High Weald. In recent years the availability of such facilities across Sussex and the South East has declined (including following the closure of the Tottingworth abattoir in Wealden district), an issue that has been highlighted by the National Farmers Union. Proposals for such facilities will be supported where they accord with the other policies of the Plan.

4.99 Forestry operations and associated development can give rise to noise, dust and traffic impacts. Proposals should therefore be located and designed to avoid unacceptable impacts on residential amenity and other sensitive receptors.

4.100 Proposals for new agricultural tracks must use a landscape-appropriate choice of surface material such as crushed stone, hoggin or road planings, permeable where possible, and avoiding tarmac. In addition, particular care should be taken in and in close proximity to woodlands, including ancient woodlands, where the location and surface material of any new/enlarged track should not adversely impact on root areas of trees, the biodiversity of ground flora, or landscape character.

Policy ECO10: Agricultural Diversification

Status	Non-strategic
Priorities	Green to the Core, Thriving Local Economy
Strategic Objectives	3, 4, 6, 8

1. Development proposals involving the diversification of agricultural and other land-based rural business activities will be supported where they:

    a. Are located within an active enterprise;

    b. Demonstrate how the scheme will support and add value to the existing enterprise. Where appropriate, permission for diversification

schemes will be subject to a condition tying the new enterprise to the existing business;

c. Are ancillary and subordinate in scale to the farm or land-based business;

d. Do not cause severance or disruption to an agricultural holding;

e. Make use of redundant buildings before proposing new buildings. Where new buildings are proposed, these should be clustered within or otherwise adjacent to existing building groups, having regard to the historic development of the original enterprise and any heritage or landscape constraints;

f. Are of an appropriate scale and will not adversely impact on the character of the landscape, as well as local amenity and tranquillity;

g. Demonstrate that due regard has been given to accessibility by public and sustainable transport where possible and that traffic generation can be satisfactorily accommodated on the local road network, ensuring access arrangements are acceptable.

2. Proposals for holiday accommodation as a form of diversification will be supported where they are provided through the conversion of a suitable redundant building. If the proposal involves the conversion of a traditional historic farm building, it will need to accord with Policy HER2 (Conversion and Re-use of Historic Buildings). Proposals for new build or other forms of holiday accommodation within existing rural enterprises also be assessed against Policies ECO5 and ECO6 of this chapter.

Key evidence and/or guidance

- East Sussex 2050 Economic Prosperity Strategy
- High Weald AONB Management Plan 2024-2029

4.101 National planning policy supports the sustainable growth of businesses in rural areas, including through the development and diversification of agricultural and other land-based businesses. This policy offers in principle support for such schemes, both through the reuse of existing redundant buildings and in some circumstances through new development. Diversification schemes can include, for example, workshops, farm shops or tourist facilities, and other employment uses such as offices. There are often high interdependency and mutual benefit between developing markets for local food production and other business activities.

4.102 The diversification of traditional rural businesses has by now become an established means of supporting the agricultural activities that are integral to the vitality of rural areas. At the same time, adding new farming activities to changing farming needs and development economics have meant that many former farm buildings, historic and modern, have become available for conversion and re-use.

4.103 What is essential to diversification schemes, in contrast with other businesses in the rural areas, is that they add value to the established agricultural or other land-based business while remaining ancillary in function.

4.104 For developments within the High Weald National Landscape (HWNL), schemes will need to have regard to the High Weald Management Plan and associated guidance published by the HWNL Unit. The Management Plan sets out support for farm diversification projects subject to conserving the National Landscape and not adversely impacting on the agricultural viability through retaining sufficient productive land and compatible uses.

4.105 It is acknowledged that by their nature, rural diversification schemes will often be in less accessible locations, unable to offer access via a wide range of means of transport. However, opportunities for sustainable transport should still be maximised as far as possible, with EV charging points provided where the only travel option is the private car but the proposal is otherwise acceptable.

Policy ECO11: Equestrian Developments

Status	Non-strategic
Priorities	Green to the Core, Thriving Local Economy
Strategic Objectives	3, 4

1. Proposals for equestrian developments must, individually and cumulatively, safeguard the intrinsic and locally distinctive character and amenities of the countryside, with particular regard to the conservation of the High Weald National Landscape.

2. In addition, proposals should accord with the following criteria, as applicable:

    a. Clearly demonstrate that the proposal is for, or directly associated with, an equestrian use and provide sufficient information to justify the

nature of the proposal in relation to the existing and/or proposed equestrian activities;

b. The siting, scale and design, including materials and boundary treatment, of any new buildings or facilities should be appropriate to their context and rural setting;

c. Proposals should not be sited in particularly prominent or isolated locations where new development would not be appropriate;

d. Where proposals are sited on agricultural land, areas of poorer quality land should be preferred to higher quality land. Similarly, the siting of proposals should have regard to the hierarchy of international, national, and locally designated sites, by prioritising sites on land with the least environmental or amenity value;

e. Commercial riding schools, livery stables and related facilities should be satisfactorily integrated with existing buildings;

f. Any associated floodlighting, earthworks, new access routes or ancillary structures, including storage facilities, manure bays, hard-standings, fencing and jumps, should not have an adverse impact on the surrounding countryside, biodiversity or local residential amenities, having regard to other relevant policies in the Plan; and

g. Adequate provision should be made for the safety and comfort of horses in terms of the land for grazing and exercising, notably in the consideration of stabling proposals. Where possible, commercial riding schools, livery stables and other commercial facilities should have satisfactory access to the public bridleway network without the use of unsuitable roads and in all cases not adversely impact on road safety.

3. In some circumstances, conditions (such as the removal of permitted development rights for fencing and external storage) may be applied where it is considered that there is the need to control potential adverse landscape impacts. Permission may also be subject to the removal of excessive or inappropriate fencing which has already taken place.

Key evidence and/or guidance

- East Sussex 2050 Economic Prosperity Strategy
- High Weald AONB Management Plan 2024-2029

4.106 The Rother area continues to be a popular area for equestrian activities. Its countryside provides an attractive environment for horse riders and there is a good network of

bridleways throughout the district. Equestrianism is recognised as a countryside pursuit and has a role in supporting the rural economy.

4.107 This policy aims to accommodate equestrian developments whilst setting out the key considerations, notably in terms of the potential harm to the character of the countryside and particularly the High Weald NL so they are sensitive to their context.

4.108 While there is a limited number of larger commercial centres in the district, it is small-scale facilities for individual and private pursuit that predominantly come forward as planning applications. Typically, proposals for stables will include a tack room as well as external hard-standing and manure bays, but may also include a sand school, fencing and jumps, as well as new access from the highway.

4.109 A balance needs to be struck between meeting the desires of the equestrian community and at the same time safeguarding the intrinsic value and locally distinctive rural character and landscape features of the countryside. This is especially the case in the High Weald NL, the conservation and enhancement of which is afforded great weight.

4.110 The High Weald National Landscape is particularly vulnerable to new development, including on the fringes of settlements. New buildings and hard surfaces – access roads or sand schools – are not always easily accommodated without some impact on the fields, small woodlands and farmstead meadows which make up the essential character of the High Weald NL.

4.111 Much of the rural area beyond the High Weald NL is also sensitive for other reasons; notably, the lower and open Levels extending eastwards towards the Romney Marsh are ecologically sensitive and subject to national and international protection. More generally, equestrian developments can have ecological impacts, for example, through habitat or species loss, nutrient enrichment, or the use of lighting. Sites should also have regard to avoiding the loss of higher quality agricultural land.

4.112 Other than the possibility of utilising former farm or other commercial buildings for new uses, there is limited scope within the countryside to accommodate further commercial equestrian enterprises. However, there is scope for equestrian development in the countryside that is limited in scale, although there is a need to manage the increasing pressures from proposals for new isolated stables and, at the other extreme, from a cumulative impact of stabling and equestrian facilities in a concentrated area. Applications should clearly demonstrate that proposed buildings, facilities and associated works are

genuinely required for, and proportionate to, the equestrian use of the site. Where planning permission is granted, conditions may be imposed, where appropriate, to ensure that buildings and facilities are retained for equestrian purposes.

4.113 Ordinarily, new development should be sited close to existing built development and close to the bridleway system. Mobile field shelters can often be an appropriate way of catering for equestrian uses, although this is not always practicable.

4.114 Where applications come forward in more remote locations and permanent buildings are required, new development will be expected to meet a number of criteria aimed at protecting the character of the countryside and the amenities of both local residents and users of the countryside.

4.115 Particular control is necessary over the location of any new equestrian development and the size, siting and design of all new buildings and associated facilities. Floodlighting will rarely be acceptable for private/ domestic stables in the countryside, particularly in the High Weald NL and in those areas identified as having "dark skies". Any lighting necessary for commercial uses will need to be carefully designed in accordance with Policy LAN4 (Light Pollution & Dark Skies). Extensive access roads or excavations other than of a minor nature to enable the formation of a sand school (or manège) are not appropriate in the countryside.

4.116 In assessing applications, adequate provision should be made for the safety and comfort of horses in terms of land for grazing and exercising. Such provision will help to address the issue of the excessive sub-division of fields and over grazing/loss of soil structure. While there is not a common standard applicable throughout the plan area, depending on how the horses are kept and the nature of the land, a desirable guideline would suggest stocking at a density of one hectare per horse.[107]

Policy ECO12: Local Employment & Skills

Status	Non-strategic
Priorities	Live Well Locally
Strategic Objectives	2, 5, 9
1. Development proposals are encouraged to source local businesses, recruit local workers and provide workplace training, skills development, and	

[107] Managing Land for Horses, Kent Downs AONB Unit (2011)

apprenticeships during the planning, construction and operational phases of development.

2. Development proposals of 20 or more gross dwellings or 1,000 square metres or more gross non-residential floorspace[108], will be required to produce a Local Employment and Skills Plan (LESP) and make a planning contribution to the Council for the costs associated with the implementation and monitoring of the LESP, as follows:

   a. £200 per dwelling;

   b. £2 for every sqm of non-residential floorspace.

3. Planning contributions based on the figures set out in (2) above will be index linked, starting from the date of the adoption of the Local Plan.

Key evidence and/or guidance

- East Sussex 2050 Economic Prosperity Strategy
- Rother Economic Recovery Action Plan (2020)
- Rother Local Plan Viability Assessment (2026)
- 2025 Indices of Multiple Deprivation

4.117 Ensuring local residents have access to good quality jobs, training and education opportunities is a key part of both the East Sussex Economic Prosperity Strategy and the Rother Economic Recovery Action Plan.

4.118 As set out previously in the Local Plan, some of the key challenges to the delivery of sustainable economic development in Rother relate to local skills shortages and gaps, as well as the availability of good quality jobs and training opportunities. These are determinants of deprivation and inequality experienced in some areas of the district. For example, in the 2025 Indices of Multiple Deprivation, Rother ranked 91st out of 296 local authority areas for employment deprivation, and 72nd for education, skills and training deprivation.

4.119 The Council has an established process of using planning obligations to secure Local Employment and Skills Plans (LESP) from larger developments. LESPs set out opportunities for, and enable access to, employment and the upskilling of local people through the construction phase. Where appropriate, operational phase employment and

[108] Development also includes any previously non-qualifying planning application that is amended via a Section 73 Application that meets the above thresholds for development.

skills measures will be sought where long-term jobs are created. Opportunities are to be made available to qualifying residents from the local area as far as possible.

4.120 LESPs will be required from all developments over the threshold of 20 or more gross dwellings and 1,000 sqm or more gross non-residential floorspace. Qualifying developments are required to make a financial contribution to the Council. The contribution is required to fund the Council's role in coordinating, facilitating, administering, monitoring and reporting on the delivery of the LESP, including its work through the Rother Employment and Skills Forum (RESF) and engagement with local training and employment providers. Financial contribution requirements are set out in the policy, and they are to be index linked for inflation based on the adoption date of the Local Plan.

4.121 In addition, certain forms of development (such as energy generation, energy storage, utilities and other specialist infrastructure projects) may not be capable of delivering a conventional Local Employment and Skills Plan due to the highly specialised nature of their construction or operational requirements. Nevertheless, such developments can represent significant capital investment and may generate demand for construction, engineering and technical skills. Where the Council is satisfied that the delivery of a meaningful LESP would not be practicable, it may seek an appropriate financial contribution through a planning obligation towards local employment, training and skills initiatives. Such contributions will be directed through programmes and priorities identified by the Rother Employment and Skills Forum and used to support vocational training, apprenticeships and other measures that improve access to employment opportunities for local residents. The scale of any contribution would be proportionate and agreed through the planning application process having regard to the nature of the development, its construction value, construction period, workforce requirements and the potential employment and skills opportunities arising from the development.

Implementation

4.122 Planning obligations will be established for qualifying developments, Before the development can commence, the developer will need to produce an LESP and submit this to the Council for approval.

4.123 The LESP should include data that identifies the employment and skills requirements for the local area, as specific as possible to the location of the development. The LESP will need to set out arrangements working directly with local employment/training agencies as

part of an employment and training consortium through the Rother Employment and Skills Forum (RESF).

4.124 The LESP must specify the provision of training opportunities and other initiatives in respect of the vocational and employability skills required by the developer, their contractors and future occupiers, for new jobs created by the Development both during its construction and operational phases.

4.125 LESP targets are likely to be aligned with the approach set by the National Skills Academy, which has developed National Skills Academy for Construction Client Based Approach[109] to provide a framework for producing and implementing an Employment and Skills Strategy for construction projects. This framework formulates benchmarks to provide target outputs for a range of employment and skills areas such as apprenticeships and entry into employment. These benchmarks have been formulated for a range of construction types and bands. Requirements are ultimately based on the overall value of a given development. This framework is then used to set locally specific employment, training and skills development opportunities, targets which are identified through the LESP, the skills development opportunities locally available and in coordination with the RESF.

4.126 The developer is required to implement the approved LESP and promote the objectives of the approved Plan. The targets of the LESP are set out in a Delivery Plan that spans the length of the LESP. This LESP Delivery Plan is openly shared with the RESF. The ongoing delivery of the LESP's agreed employment, training and skills targets, will be formally and informally supported, monitored and reported on by the Council.

4.127 . The monitoring considers whether the LESP targets are being achieved at the correct standard, including whether opportunities are being offered to local people as agreed.

4.128 Financial contribution for skills and training align with the cost of the build and its finished value, the build-time to completion, and the corresponding time that the Council is involved in the support and monitoring of the LESP targets.

Employment and Skills Forum (RESF)

[109] Industry standard benchmarks are currently set out in the National Skills Academy for Construction Client Based Approach from 2017. While this is the latest available version, developers would be expected to comply with the latest version as and when these benchmarks are updated.

4.129 The RESF is a local partnership that brings together organisations such as Rother District Council (which plays a leading role), East Sussex County Council, Jobcentre Plus, local colleges like Bexhill Sixth Form College, and voluntary groups such as Rother Voluntary Action, alongside training and employment support providers. It aims to improve collaboration, share information, and align services so residents can more easily access jobs, training, and support, helping to strengthen the local economy, address skills gaps and develop improved links & support for local businesses.

4.130 The Rother Employment and Skills Forum (RESF) plays an integral role in delivering employment and skills measures at the heart of Employment and Skills Plans by acting as a coordinating and oversight body. The S106 Planning Obligation will itself specify that as part of delivering an Employment and Skills Plan, the developer must work directly with the RESF. Through its partnership of organisations such as the local authority, Jobcentre Plus, colleges, and training providers, the forum has assisted in aligning developer commitments with existing local provision, ensuring that employment and training opportunities tied to developments are targeted towards local residents. In this way it puts developers into contact with the training and employment providers, enables the production of realistic and locally relevant employment and skills plans, helping to ensure that S106 obligations are not only met but deliver meaningful, long-term benefits to the local workforce and economy.

Chapter 5: Green to the Core

Policy GTC1: Net Zero Development

Status	Strategic
Priorities	Green to the Core
Strategic Objectives	1, 2

Operational Energy

1. All new development proposals must prioritise a 'fabric first' approach[110] and be designed and orientated to minimise energy demand for heating, lighting and cooling, in accordance with Policy LWL6.

2. Opportunities to provide solar PV and energy storage must be incorporated where feasible, and opportunities to connect to district heat networks and decentralised electricity networks should be considered where these are available.

3. Compliance with the applicable requirements of this policy will be required to be demonstrated through the submission of proportionate information with the planning application. Major development proposals must be supported by an Energy Statement.

4. All new dwellings will be expected to achieve the following:

    a. For new builds, a 60% improvement over the dwelling Target Emissions Rate (TER), calculated using SAP 10.2.

    b. For conversions to residential development, a Building Research Establishment Environmental Assessment Method (BREEAM) 'Excellent' standard as a minimum.

    c. Where it is demonstrated through the information submitted with the application that the 60% TER improvement required by criterion 4(a) is not technically feasible, the development must achieve the maximum feasible improvement over TER. The submitted information must clearly identify the technical constraints and the measures considered to maximise performance.

5. Compliance with the residential operational-energy requirement must be demonstrated through the relevant SAP calculations submitted with the application and verified through an as-built assessment prior to

[110] See, for example, National House Building Council: Chapter 1 - Fabric First - NHBC

occupation. The requirements relating to BREEAM should be demonstrated through the relevant certification process.

6. Non-residential development (including building conversions) should achieve:

    a. A LETI TEUI Target for Operational Energy of:

        i. For office buildings (Class E(g)(i)) - 55 kWh/m2/year (GIA);

        ii. For light industrial buildings (Class E(g)(ii) and (iii)) - 65 kWh/m2/year (GIA); and

        iii. For general industrial and warehousing buildings (Class B2, B8 and associated Sui Generis), a feasibility statement to evidence a practicable TEUI Target; and

    b. A BREEAM 'Excellent' standard as a minimum.

7. If BREEAM is updated or replaced during the plan period, the equivalent replacement requirements will be applied.

Embodied Carbon

8. All new development proposals must meet the following embodied carbon standards, with compliance demonstrated in accordance with criterion (3) above:

    a. All residential development must achieve a LETI C rating for embodied carbon emissions, equating to 600 kgCO2/m2 upfront embodied carbon and 970 kgCO2/m2 total embodied carbon. From 1 January 2030, a LETI A rating must be achieved, equating to 300 kgCO2/m2 upfront embodied carbon and 450 kgCO2/m2 total embodied carbon.

    b. All office development should achieve a LETI C rating for office development, equating to 600 kgCO2/m2 upfront embodied carbon and 970 kgCO2/m2 total embodied carbon.

    From 1 January 2030, a LETI A rating must be achieved, equating to 350 kgCO2/m2 upfront embodied carbon and 530 kgCO2/m2 total embodied carbon.

Key evidence and/or guidance:

- Ove Arup and Partners' Rother Climate Change Study - Net Zero Carbon Evidence Base Report (2023)

- Ove Arup and Partners' Rother Energy Efficiency Standards Study (2026)

5.1 The UK Climate Change Act commits the UK Government by law to ensuring that the UK's greenhouse gas emissions for the year 2050 are at least 100% lower than the 1990 baseline (net zero). Dwellings are a significant contributor to greenhouse gas emissions, responsible for 16% of the UK's total emissions in 2020, and unlike other sectors such as business and transport, residential homes saw emission levels rise between 2017 and 2020[111].

5.2 Building Regulations establish minimum standards for the energy and carbon performance of new homes. The Council considers that higher standards are necessary to support the transition to net zero and reduce the operational carbon emissions associated with new development. This will also reduce energy bills for occupiers, at a time of significant volatility in energy prices. A "fabric-first" approach, which minimises energy demand before considering low-carbon heat and renewable energy generation, is an important part of achieving this. Policy LWL6 sets out how orientation, microclimate, compact built form and opportunities for low-carbon and renewable energy should be integrated with site layout, landscape, local character and other placemaking objectives.

5.3 For residential development, this policy expresses the mandatory operational energy requirement as a percentage improvement over the Building Regulations Target Emissions Rate (TER), calculated using the specified approved methodology. The Council's Energy Efficiency Standards Study (2026) recommends a 60% improvement over TER for new dwellings. The study finds this level of improvement is likely to deliver operational energy performance broadly aligned with the UK Net Zero Carbon Buildings Standard EUI limits for new buildings. The UK NZCBS EUI limits provide a useful performance benchmark but do not constitute a separate mandatory residential compliance requirement under this policy. Compliance with the residential operational energy requirement will be demonstrated through the relevant approved energy calculations submitted with the planning application and, where appropriate, verified through an as-built assessment.

5.4 Non-residential TEUI targets are set for light industrial and office buildings. To achieve these targets, it is likely that rooftop and/or on-site ground solar PV systems will need to be installed.

[111] 2020 UK final greenhouse gas emissions statistics: one page summary (publishing.service.gov.uk)

5.5 For new industrial buildings, including warehouses, the target is flexible and will be considered on a case-by-case basis. A feasibility statement should demonstrate that the best energy efficiency outcomes have been achieved to serve the proposal, by maximising opportunities for on-site solar PV systems and optimising building fabric performance, heating and ventilation.

5.6 Embodied carbon (the carbon associated with both building materials and the construction and maintenance of a building throughout its whole lifecycle) is a significant contributor to carbon emissions and is likely to amount to as much as 50% of total emissions over a building's lifetime as operational emissions reduce. Rother's Climate Change Study (2023) advises that, based on the joint Embodied Carbon Target Alignment guidance from LETI, RIBA and other industry organisations, current average building design achieves an E rating on the LETI carbon rating system, equating to 950 kgCO2 /m2 upfront embodied carbon and 1400 kgCO2 /m2 total embodied carbon. While the policy aim should be to achieve the LETI A rating for both residential and non-residential buildings, Arup's carbon specialists advise that the construction industry is not yet capable of meeting this. Therefore, a staggered approach is proposed to transition towards meeting the LETI A rating target from 2030.

5.7 In relation to waste, the ESCC Waste and Minerals Local Plan requires proposals to minimise the quantities of aggregates used in construction and prioritise the use of recycled and secondary aggregate over virgin aggregate. It supports the promotion of sustainable aggregate use policies within Local Plans.

5.8 Development should also have regard to Policy HER1 (Conservation of the Historic Environment) which sets out how the historic built environment must be considered and protected by new development. More specifically, Historic England have produced guidance 'Adapting Historic Buildings for Energy and Carbon Efficiency' Advice Note 18, providing advice to homeowners and local planning authorities on requirements for decarbonising and improving the energy efficiency of historic buildings.

National policy context

5.9 National policy allows local planning authorities to seek residential energy performance standards above Building Regulations where these are supported by a well-reasoned and robustly costed rationale, including consideration of development viability, housing supply and affordability.

5.10 Where an additional residential energy performance requirement is set, national policy requires the standard to be expressed as a percentage improvement over the dwelling Target Emissions Rate (TER), calculated using a specified approved methodology.

5.11 The Council's technical and viability evidence supports seeking a residential energy performance standard above Building Regulations. This policy therefore requires new residential development to achieve a 60% improvement over TER. The Council's Energy Efficiency Standards Study (2026) finds that a 60% improvement over TER is likely to deliver operational energy performance broadly aligned with the UK Net Zero Carbon Buildings Standard EUI limits for new dwellings.

Policy GTC2: Net Zero Retrofitting

Status	Strategic
Priorities	Green to the Core
Strategic Objectives	1, 4

1. Development proposals which result in considerable improvements to the energy efficiency and reduction of carbon emissions of existing buildings will be supported.

2. Development affecting statutorily and non-statutorily protected historic buildings, or within Conservation Areas, should be guided by Historic England advice on climate change and historic building adaptation.

3. Alterations and extensions to existing buildings which comprise major development must:

    a. Provide an Energy Statement which aligns with the six principles for best practice in LETI's Climate Emergency Retrofit Guide.

    b. Meet BREEAM Domestic Refurbishment Excellent standard, as a minimum, when delivering 10 dwellings or more.

    c. Demonstrate that due consideration has been given to the carbon efficiency of the whole building.

Key evidence and/or guidance:

- Ove Arup and Partners' Rother Climate Change Study - Net Zero Carbon Evidence Base Report (2023)
- Historic England Advice Note 18: Adapting Historic Buildings for Energy and Carbon Efficiency

5.12 It is widely accepted that retrofitting of existing buildings is essential if net zero targets are to be achieved. A substantial amount of annual CO2 emissions come from existing homes - homes that are likely to be in use in 2050. If these are retrofitted well, this can offer a host of environmental, social and economic benefits.

5.13 Retrofit is not only about reducing carbon emissions. A best practice retrofit should reduce fuel bills, reduce fuel poverty and also improve health and wellbeing.

5.14 LETI's Climate Emergency Retrofit Guide underpins the Local Plan retrofit policy, setting out what good retrofit looks like for existing homes, and targets energy consumption reductions of 60-80% for the average home.

5.15 LETI best practice for retrofit is led by the following principles, which must be addressed in a submitted Retrofit Plan for major development, setting out building information, key works, and a plan for monitoring and consumption:

1. Reduce energy consumption.
2. Prioritise occupant and building health.
3. Have a whole building Retrofit Plan.
4. Measure the performance.
5. Think big!
6. Consider impact on embodied carbon.

5.16 Proposals affecting heritage assets must have regard to Historic England's Advice Note 18 'Adapting Historic Buildings for Energy and Carbon Efficiency'.

Policy GTC3: Construction Materials and Waste

Status	Strategic
Priorities	Green to the Core
Strategic Objectives	1, 2, 11

1. Development proposals that reuse previously developed land and buildings, consistent with maintaining and enhancing local character and distinctiveness, will be supported subject to other Local Plan policies.

2. Major development proposals involving demolition and/or refurbishment will be required to demonstrate through the planning application how opportunities to reuse and recycle materials that arise through demolition and refurbishment have been maximised, including through the reuse of

excavated soil and hardcore within the site. All major development proposals involving demolition will be required to undertake a pre-demolition audit, to determine products and materials for re-use.

3. Major development must demonstrate how buildings have been designed, where practicable, to facilitate future adaptation, disassembly and the reuse or recovery of components and materials.

Key evidence and/or guidance:

- Ove Arup and Partners' Rother Climate Change Study - Net Zero Carbon Evidence Base Report (2023)
- East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan

5.17 The Local Plan seeks to ensure that the sustainability of development includes the construction stage. Requirements relating to the construction processes of major developments, such as a pre-demolition audit and "design for disassembly", ensure that every stage of the development process from design to demolition has been considered in terms of embodied and operational carbon and waste.

5.18 A pre-demolition audit provides advice about the products and materials that can be re-used or re-cycled prior to demolition or refurbishment, to ensure best practice in resource efficiency is adopted by the contractor. The process enables the construction industry to manage waste sustainably and at a high value, with outcomes based upon accurate data. Policy LWL5 addresses how material reuse, adaptability, design for disassembly and circular economy principles should inform the design of development, including material choice, local distinctiveness and whole-life design.

5.19 The 'design for disassembly' concept aims to preserve resources and address concerns regarding power consumption. The key principle is that the buildings are made specifically for material recovery and value retention. Buildings designed according to the principle of design for disassembly are enduring and constructed in a way that envisions they will never be demolished but layered in such a way that ensures that they can be one day taken apart for re-use.

5.20 This policy complements policies of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan, including Policy WMP3a (Promoting Waste Prevention, Re-use) which seeks to maximise waste prevention and re-use, including through encouraging developments that involve the preparation of materials for re-use, and Policy

RM0 (Sustainable Use of Aggregates)[112] which supports proposals that minimise the quantities of aggregates used and prioritise the use of recycled and secondary aggregates, and requires applicants to demonstrate the sustainable use of aggregates as part of their wider consideration of resources used when designing their developments.

Policy GTC4: Water Efficiency

Status	Non-strategic
Priorities	Green to the Core
Strategic Objectives	1, 3

1. All new development proposals should minimise their impact on water resources. Proposals should seek opportunities to integrate rainwater and/or grey-water storage and recycling measures, green roofs and walls, and other water efficiency measures.

2. All new dwellings are required to be designed to achieve a water consumption rate of no more than 100 litres per person per day.

Key evidence and/or guidance:

- Water Resource Management Plans
- Environment Agency/Department for Environment, Food and Rural Affairs data (identifying Rother as a seriously water stressed area)

5.21 National planning policy requires development plans to take a proactive approach to mitigating and adapting to climate change, taking into account impacts including extreme weather, drought and flood risk, and implementing measures including setting local water efficiency standards for new development where these are justified. Local plans may apply the Building Regulations optional requirement of 110 litres per person per day where justified, or exceptionally a more stringent local standard in areas of serious water stress.

5.22 Rother is within a serious water stressed area as determined by the Environment Agency[113]. Therefore, a more stringent requirement than the Building Regulations optional requirement can be justified. Water usage for new dwellings of 100 litres per person per day has been subject to viability testing through the Local Plan Viability

[112] East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan Revised Policies (October 2024)

[113] Water stressed areas – 2021 classification, published by Environment Agency and Department for Environment, Food and Rural Affairs (July 2021)

Assessment (2026) and found to be acceptable in these terms. This requirement would be secured via a planning condition of the development being approved.

5.23 Both South East Water and Southern Water have company-wide Water Resource Management Plans. These set out how the water companies will secure water supplies into the future. These plans have fed into the region-wide Water Resources South East (WRSE) regional plan which has brought together all the water companies in the region. WRSE confirms that the whole of the South East is designated as seriously water stressed by the Environment Agency. The water supply in the region is under increased strain from an increasing population; climate change, particularly changes to rainfall patterns and droughts; and the need to balance increasing demand for water while protecting and improving the environment.

5.24 To help address these challenges, the policy goes further than simply requiring higher standards than Building Regulations for new dwellings, by also giving weight to development proposals of all scales and types which take opportunities to reduce water consumption. This could be through measures such as rainwater storage and recycling (including underground tanks and "dual pipes" to allow rainwater to be recycled in the home), the installation of water efficient appliances, and allowing space within site layouts for water storage and treatment.[114] The extent to which a proposal can demonstrate being water efficient will be a factor weighing in its favour (and subject to design, heritage and safety considerations).

Policy GTC5: Heat Networks

Status	Non-strategic
Priorities	Green to the Core
Strategic Objectives	1

1. Development proposals for decentralised low-carbon energy infrastructure, including district heat networks, will be supported where compatible with other policies in the Local Plan.

2. Where an existing or committed heat network is capable of serving a development, development proposals should be designed to enable connection to the network and will be expected to connect where technically and financially feasible.

[114] Best practice guidance should be referred to, for example 'Water Efficiency and Reuse in Housing: Design Guide for a Changing Climate' (Good Homes Alliance, 2025).

Key evidence and/or guidance:

- Ove Arup and Partners' Rother Climate Change Study - Net Zero Carbon Evidence Base Report (2023)

5.25 National planning policy encourages Local Plans to take advantage of opportunities to draw low carbon energy from decentralised networks (such as district heat networks), where these are available, and to co-locate energy and heat generators and users, especially to take advantage of suppliers of surplus heat and energy.

5.26 For residential developments, the Rother Climate Change Study - Net Zero Carbon Evidence Base Report (2023) identifies that the most favourable opportunities for establishing new district heat networks are in Bexhill-on-Sea because of existing building heat density and the presence of large, non-residential buildings with sufficient heat demand to act as anchor loads. The most favourable opportunities for large non-residential developments are in Bexhill-on-Sea and Rye Harbour. Where an existing or committed heat network is capable of serving a development, connection should be considered in accordance with Policy GTC5. Development proposals should therefore refer to the Rother Climate Change Study, or successor evidence base documents, for the latest information on decentralised or other heat network opportunities.

5.27 A community heat network has been delivered at The Gateway development in North East Bexhill. The development is served by a centralised heat network providing heating and hot water to homes, demonstrating how low-carbon heat infrastructure can be incorporated into larger residential developments within the district. The network is specific to The Gateway development and should not be assumed to have capacity to serve development outside the site unless this is confirmed by the network operator.

5.28 Where heat-network or other decentralised-energy infrastructure is proposed, it should be coordinated with the site masterplan and built form from the outset. Necessary plant, pipe routes, connection points and provision for future connection should be integrated so that they do not undermine the quality of buildings, streets, landscape, green and blue infrastructure or public realm, having regard to Policy LWL6.

Policy GTC6: Renewable and Low Carbon Energy

Status	Strategic
Priorities	Green to the Core
Strategic Objectives	1, 3, 11

1. Development proposals for renewable and low carbon energy generation will be supported where:

    a. They will not result in unacceptable adverse impacts on landscape character including the High Weald National Landscape; trees, woodland and hedgerows; higher quality agricultural land[115]; or heritage assets;

    b. They will avoid unacceptable visual impact from the effect of glint and glare and shadow flicker on the landscape, on neighbouring uses and aircraft safety;

2. Weight will be given to proposals for community-led renewable and low energy generation initiatives, including those proposed through Neighbourhood Planning.

3. In addition, the following criteria will be used to assess specific generation types:

    Solar

    a. Proposals for roof-mounted solar energy supply infrastructure will be supported, subject to other policies and Policy HER1 (Heritage Management) in particular.

    b. Stand-alone ground mounted installations will be supported, subject to other policies, on previously developed land.

    c. Proposals for ground-mounted installations on greenfield land will be considered in line with other Local Plan and national planning policies, particularly those relating to landscape impact and the effect on the best and most versatile agricultural land. Greenfield sites within, or affecting the setting of, the High Weald National Landscape are

[115] As defined in the NPPF, best and most versatile agricultural land: Land in grades 1, 2 and 3a of the Agricultural Land Classification (ALC). ALC is graded from 1-5 and based on yield, range and versatility of use, and need for input.

unlikely to be suitable locations for commercial scale[116] ground-mounted solar farms.

Energy Storage

d. Proposals for energy storage will be supported subject to other policies, where it is co-located with an existing or proposed renewable energy development or can be shown to alleviate grid constraints and demonstrate fire and leak containment safety.

4. Land at Pebsham Landfill Site, Freshfields, is suitable in principle for a stand-alone ground mounted solar installation for a temporary period[117], subject to other Plan policies.

Key evidence and/or guidance:

- Ove Arup and Partners' Rother Climate Change Study - Net Zero Carbon Evidence Base Report (2023)
- High Weald National Landscape Unit, Position Statement on Solar Farms (2025)

5.29 Planning policy has a fundamental role to play in the implementation of successful and long-term sustainable energy solutions, and this can be delivered with the support of other agencies and stakeholders.

5.30 Roof-top solar is strongly supported. Stand-alone ground mounted solar installation opportunities are limited within the district however the policy supports suitable schemes in appropriate locations. The High Weald National Landscape (HWNL) Unit has published a Position Statement on Solar Farms and the HWNL which should be referred to in considering relevant proposals.

5.31 The opportunity for the development of wind turbines within the district, is extremely limited and is not appropriate in, or within the setting of, the High Weald National Landscape. The Local Plan Climate Change Study corroborated the findings of RDC's Renewable Energy Background Paper (2016), with Catsfield and Crowhurst found to be

[116] The High Weald National Landscape Position Statement on Solar Farms and the HWNL (2025) suggests that small-scale freestanding ground-mounted solar arrays (i.e. up to 0.05ha (500sqm)/50kw) to serve individual buildings, such as schools, hotels, community buildings such as village halls, and agricultural properties etc., alongside domestic use, may be acceptable in the High Weald NL, as their lesser ground coverage is often more able to be accommodated into the small-scale landscape without industrialising its character or scenic natural beauty.

[117] It is understood that the expected lifespan of a solar farm is 25-40 years. The site is not suitable for permanent use, beyond this period, due to its inclusion as part of the Combe Valley Countryside Park.

the parishes with the most favourable spatial conditions for wind turbines, subject to further investigations regarding wind speed data. However, given the landscape sensitivities of these parishes (being either within or close to the HWNL) and the lack of any third-party promotion of land for wind turbines, this has not been explored further at this stage. Any planning application which does come forward would be assessed against this policy together with other local and national planning policies.

5.32 Historic England has produced guidance 'Adapting Historic Buildings for Energy and Carbon Efficiency' Advice Note 18, providing advice to homeowners and local planning authorities on requirements for decarbonising and improving the energy efficiency of historic buildings.

Pebsham Landfill Site

5.33 Pebsham landfill is a 34-hectare site that closed in 2014, owned by Hastings Borough Council but on a long lease to East Sussex County Council. The site benefits from a National Grid connection to export electricity generated via landfill gas. At the close of the landfill site, this was generating at full capacity, however gas volumes (and electricity generation) are now in decline, allowing potential capacity for additional energy input from solar power. The site is within a Strategic Gap and the Combe Valley Countryside Park, however it is uniquely placed in the district and indeed the county, in terms of it being a recently closed landfill site, currently unsuitable for other uses or public access, and offers an opportunity for temporary use as a solar farm to generate a significant amount of renewable energy.

5.34 The site is largely elevated and exposed in relation to the surrounding land and topographically could be suitable to accommodate a solar farm. However, its proximity to sensitive receptors including the Combe Valley Countryside Park, local residents and businesses means that the design and layout would need careful consideration to ensure no adverse effects in terms of glint and glare from the solar panels. Other visual impacts from the panels, including in longer countryside views, are likely to be able to be mitigated through a careful layout, avoiding panels on the more elevated parts of the site, but a landscape and visual impact assessment would need to inform the detailed proposal. The site is also close to protected habitats including the Combe Haven SSSI, and consideration of likely impacts would be needed to inform the site layout and necessary BNG measures. Appropriate drainage measures would also be required, having regard to the sloping topography, nearby watercourses and sensitive habitats.

5.35 It is understood that there is an approved restoration plan for the landfill site (secured by the Waste Planning Authority), including areas of woodland and scrub planting. The long-term plan for the site is to allow public access on paths that would link to rights of way in the wider countryside, leading to a viewpoint at the highest point of the landfill. It is understood, however, that the landfill site will not become safe for public access for many years. In any event, further information would be required at planning application stage to clarify how the proposal would impact on the agreed plans for restoration and future use.

Chapter 6: Live Well Locally

Policy DEV1: General Development Considerations

Status	Strategic
Priorities	Green to the Core, Live Well Locally, Thriving Local Economy
Strategic Objectives	2, 9

1. In addition to considerations set out by other policies, all development proposals must meet the following criteria:

    a. It meets the needs of future occupiers, including providing appropriate amenities and the provision of appropriate means of access for disabled users;

    b. It does not unreasonably harm the amenities of existing or future occupants, adjoining and nearby properties and uses, including as a result of air, noise, light, odour, or other forms of pollution;

    c. It responds positively to the character and appearance of the locality; and

    d. It is compatible with both the existing and planned use of adjacent land and demonstrates appropriate regard to the site's previous use and characteristics.

Key evidence and/or guidance:

- National design guidance (including the National Design Guide (2021), National Model Design Code and successor Design and Placemaking Planning Practice Guidance)
- Building for a Healthy Life (2026)

6.1 All development should be capable of accommodating the reasonable expectations of likely occupiers, including the provision of indoor and outdoor space, personal safety and to not be unduly affected by adjacent intrusive uses and buildings. Development should also cater for practical needs, such as parking and access, refuse and recycling facilities and open space.

6.2 At the same time, the amenities of neighbouring properties need to be protected, in terms of light and privacy, avoiding an overbearing presence and otherwise causing intrusion such as through noise, activity at unsocial hours and lighting for instance.

6.3 Environmental impacts need to be carefully addressed, such that landscape character is conserved, inappropriate fragmentation of the countryside avoided, important trees, woodlands and hedgerows retained, and where appropriate, supplemented by new landscaping, and wildlife habitats protected and encouraged. These requirements are also supported by other environmental policies in the Green to the Core and the Natural and Historic Environment chapters of the Local Plan.

6.4 The need for development proposals to protect occupiers and users from different forms of pollution, and to ensure development does not give rise to unacceptable levels of pollution, is detailed in national planning policy. The need to ensure that infrastructure and facilities required to serve development will be provided is addressed in Policy INF1 (Strategic Infrastructure Requirements) and other policies in the Local Plan.

Policy DEV2: Comprehensive Development & Masterplanning

Status	Strategic
Priorities	Green to the Core, Live Well Locally
Strategic Objectives	1, 2, 3, 7

1. Planning applications (including in outline and full format) must ensure a comprehensive approach to development, including where individual sites form part of a larger site and/ or where sites are in multiple ownerships.

2. When an outline planning permission is sought for major development, the application must be supported parameter plan(s) defining the key spatial and design parameters necessary to demonstrate how the comprehensive development of the entire site can be achieved and to provide a clear framework for subsequent reserved matters applications.

3. In circumstances where it would speed up delivery, a planning application for part of a larger site may be permitted, but only where it has regard to, and facilitates, an integrated scheme for development of the entire site through a masterplan defining key parameters for the entire site as above.

4. In applying this policy, regard will be had to all relevant policies in the Local Plan, including Policies LWL1-LWL8, to ensure a coordinated approach across the entire development site to land use, density and built form, affordable housing, sustainable transport and access, green and blue

infrastructure (including biodiversity net gain and sustainable drainage), and other infrastructure (secured directly or through funding contributions).
Key evidence and/or guidance: • National design guidance (including the National Design Guide (2021), National Model Design Code and successor Design and Placemaking Planning Practice Guidance) • Building for a Healthy Life (2026)

6.5 National planning policy underlines the purpose of the planning system in achieving sustainable development. Development should be compatible with both the existing and planned use of adjacent land. This may involve bringing together land in different ownerships to ensure that the range of needs are met effectively within a logical overall area, or it may involve bringing together a mix of uses for an appropriate and sustainable approach to site development (for example commercial, community or recreational uses in addition to residential development). Mixed use developments are promoted in the NPPF, including as a means of supporting community facilities, new habitat creation or improved public access to the countryside.

6.6 Where a site comprises separate land ownerships, the expectation is that developers and landowners should work positively together to achieve wider goals of sustainable development and the full benefits for the local community. The need to demonstrate that proposals will secure the provision of infrastructure to serve a whole site is promoted by the policy above. The approach to land-use mix should ensure the overall viability of proposals, while also ensuring that socially, economically and/or environmentally important elements, that will typically be less commercially attractive, are not "isolated". Hence, they may be required to be effectively cross-funded, normally by residential or other commercial elements, to enable the delivery of development that is sustainable and acceptable in planning terms.

6.7 The policy is to be applied in all cases where a comprehensive approach to development is necessary for the proper planning of an area. This will include site allocations and "windfall" sites that come forward for planning permission.

6.8 To ensure a comprehensive approach for major development, a proportionate suite of parameter plans for the entire development site must be submitted where outline planning permission is applied for. These must set the vision and implementation strategy for the entire site. They should demonstrate how the sustainable transport requirements of the Local Plan will be met and should clearly set out the proposed phasing of

development, including how infrastructure needed to support each phase will be provided.

6.9 Parameter plans must, where relevant to the proposal, address the broad disposition of land uses and developable areas, access and movement, connections within and beyond the site, green and blue infrastructure and open space, landscape structure and retained site features, drainage, density and building height parameters, and any other key elements necessary to secure the design and placemaking principles of the development. They must provide sufficient certainty to secure those principles while allowing appropriate flexibility for detailed design at reserved matters stage.

6.10 Where the planning application does not relate to the entire site, it must be demonstrated that sub-division is necessary to speed up housing delivery. In some cases, this may be achieved through a hybrid planning application comprising full planning permission for an initial phase of development alongside outline proposals for the remainder of the site, provided that the application is supported by a comprehensive masterplan demonstrating the integrated development of the entire site.

Policy LWL1: Efficient Use of Land & Appropriate Densities

Status	Strategic
Priorities	Live Well Locally, Green to the Core
Strategic Objectives	1, 2, 3, 7, 11

1. All development proposals must make efficient use of land and optimise site capacity through a design-led approach to layout, scale, form, massing, building typology and relationship to context.

2. Within the High Weald National Landscape, its setting, and other designated or locally important landscapes and historic environments, densities and layouts must respond to landscape character, settlement pattern, heritage significance and setting, in accordance with Policy LAN2 (High Weald National Landscape) and other relevant policies.

Residential Development

3. Proposals involving new residential development must achieve an appropriate density having regard to surrounding form, grain, building heights, character, heritage assets and their settings, and the need to

deliver high-quality, context-responsive design. Schemes relying predominantly on large, detached dwellings or other low-yield layouts will not be supported unless clearly justified by site context, landscape, heritage or other policy requirements.

4. For new residential development, the following net density ranges, expressed in dwellings per hectare, will apply:

    a. Bexhill Urban Area (BX1): 110–130+ dwellings per hectare (dph).

    b. Bexhill Suburban areas: 45–75 dph.

    c. Historic Towns (Rye and Battle): 35–80 dph.

    d. Live Well Locally areas: 35–55 dph.

    e. Village areas (within development boundaries): 25–45 dph.

5. Countryside areas, including villages and hamlets without development boundaries: no minimum density range applies. Where residential development is supported by other policies in this Plan, density will be determined through a design-led assessment of site context in line with the other requirements of this policy.

6. The area types are defined on the Policies Map. Where a site crosses more than one area type, the relevant density range will apply to each part of the site unless a different distribution of density is justified through a site-wide design approach, having regard to the Policies Map, site context and size, accessibility, landscape, heritage and the role of each parcel within the scheme.

7. Development below the density ranges set out above will only be supported where the applicant demonstrates, through evidence, that:

    a. Site-specific constraints prevent the required density being achieved while delivering high-quality design and avoiding unacceptable impacts (for example on neighbouring residents);

    b. Those constraints cannot reasonably be addressed through an alternative design, layout, housing mix or building typology; and

    c. The proposal would still make efficient use of land and deliver a high-quality, context-responsive design in accordance with this policy.

8. Densities above the relevant range may be supported where the proposal is in a highly accessible location and demonstrates high-quality design, acceptable amenity and successful integration with its surroundings.

Employment, Commercial and Mixed-Use Development

9. Employment, commercial and mixed-use development must make efficient use of land and buildings. Proposals must demonstrate that the layout, plot ratio, building height, servicing, parking, yard space, landscaping and future adaptability have been designed to optimise employment and commercial floorspace and operational efficiency, while responding positively to local character, landscape context, access and amenity considerations.

Key evidence and/or guidance:

- National design guidance (including the National Design Guide (2021), National Model Design Code and successor Design and Placemaking Planning Practice Guidance)
- Building for a Healthy Life (2026)
- High Weald AONB Management Plan 2024-2029
- High Weald AONB Housing Design Guide (2019)
- Rother Local Plan Viability Assessment (2026)
- Rother Density Study Update (2026)

The compact development concept

6.11 Policies LWL1 to LWL8 together set out key design, accessibility and movement expectations for compact, connected, distinctive and walkable development. They will inform the preparation and assessment of site layouts, masterplans and design codes, alongside any more detailed design guidance adopted by the Council.

6.12 Compact development is central to the efficient and effective use of land and to the creation of well-designed, attractive and healthy places. In this policy, compact development does not simply mean higher density or more intensive building, although density is one important indicator. It means arranging buildings, streets, spaces and uses so that development optimises land use, supports walkable and well-connected neighbourhoods, and contributes positively to local character and quality of place.

6.13 A compact form of development can help accommodate enough people to support shops, local facilities, jobs and viable public transport, including Demand Responsive Transport, shuttle bus services and shared mobility solutions. It can also support social interaction, a high-quality public realm, green infrastructure and active travel, helping to

create safe, lively and attractive places. Access to services is addressed in Policy LWL2, while active travel and public transport connections are addressed in Policy LWL3.

6.14 Compact development should be informed by a thorough understanding of local context. However, responding to local character does not mean replicating existing patterns of development where those patterns are low-density, inefficient, car-dependent or otherwise inconsistent with the objectives of the Local Plan. In such cases, new development should improve the character, efficiency and functionality of the area while delivering high-quality, context-responsive design.

Applying the policy

6.15 The Rother Density Studies (2024 and 2026) provide key evidence for applying this policy. Proposals will be assessed through a design-led approach having regard to relevant Local Plan policies and site-specific considerations.

6.16 The policy applies to all development proposals, with the section of the policy headed 'Residential Development' applying to all proposals involving new residential dwellings. Larger schemes will usually provide the greatest opportunity to apply compact development principles through comprehensive masterplanning, but smaller schemes, including those of 1–10 dwellings, should also make efficient use of land and avoid layouts that would undermine the objectives of the policy.

Density and area types

6.17 For the purposes of identifying appropriate density ranges for new residential development, Policy LWL1 divides Rother into area types. These reflect areas of similar character and allow density expectations to be applied according to location. The area types are shown on the Policies Map. Each part of the district falls within a single area type for the purposes of applying this policy. The area types are:

a. Bexhill Urban Area (Policy BX1)

b. Bexhill Suburban

c. Historic Towns (Rye and Battle)

d. Live Well Locally areas

e. Village areas with development boundaries

f. Countryside areas, including villages and hamlets without development boundaries

6.18 The density ranges in Policy LWL1 are informed by the Rother Density Studies (2024 and 2026), which consider historic development patterns, recent delivery, accessibility to services and public transport, contemporary design best practice, and the role and function of settlements identified through the Settlement Study. The Studies should inform the design and masterplanning of proposals, including the choice of typologies, the distribution of density across sites, and the integration of green infrastructure, movement networks and public realm. They do not prescribe specific layouts or outcomes, and proposals will continue to be assessed through a design-led approach.

6.19 For the purposes of this policy, density is measured on a net developable area basis. Net developable area includes land used for residential buildings, access streets, parking and incidental open space within the development. It excludes strategic landscaping and open space, structural planting, land required for biodiversity net gain, sustainable drainage infrastructure serving wider areas, and other land that does not form part of the developable residential layout.

6.20 Achieving appropriate density will usually require the careful use of compact and efficient typologies, including terraces, apartments, mansion blocks, mews, courtyard forms, smaller dwellings and compact mixed-use forms, where these respond positively to local character, amenity and design quality. Reliance on large, detached dwellings, deep plots, excessive private drives, residual open space or highway-dominated layouts will not normally represent an efficient use of land.

6.21 Density should be distributed in response to context, accessibility and character. Within larger sites, higher densities will generally be most appropriate towards centres, public transport corridors and other accessible locations, with lower densities used where necessary to provide an appropriate transition to adjoining development, heritage assets, sensitive landscapes or the countryside.

6.22 In the historic towns of Rye and Battle, many development opportunities are likely to arise on settlement edges, where densities towards the lower end of the relevant range may be more appropriate. Where sites are in more central or accessible locations, densities toward the higher end of the relevant range may be appropriate where they respond positively to local character, heritage and townscape.

6.23 In countryside areas, including villages and hamlets without development boundaries, the application of compact development principles will reflect the scale, character and accessibility of the location. Compact development in these areas does not imply urban forms of development, but rather the careful clustering of buildings, efficient layouts and appropriate densities, informed by landscape character, settlement pattern, heritage significance and relevant design guidance, including the High Weald Housing Design Guide where applicable.

Employment, commercial and mixed-use developments

6.24 The policy also applies to employment, commercial and mixed-use developments. Any residential portion of a mixed-use development will be required to comply with the "residential development" section of the policy. Proposals involving new employment or commercial development will be required to demonstrate that the site layout, plot ratio, building height, areas for servicing, parking, yard space, landscaping and future adaptability have been designed to optimise employment and commercial floorspace and operational efficiency, while responding positively to local character, landscape context, access and amenity considerations.

Policy LWL2: Facilities and Services for Residential Development

Status	Strategic
Priorities	Live Well Locally, Green to the Core, Thriving Local Economy
Strategic Objectives	7, 8, 9

Access to local amenities and services

1. All proposals for new residential development must demonstrate that residents will have safe, realistic and convenient access to a range of everyday local amenities and services, proportionate to the scale of development and the role and function of the settlement.

2. The local amenities and services must either already be present and capable of being reached by all users via a safe, well-connected active travel network, improved where necessary as part of the development, or be provided or secured as part of the development.

3. In Bexhill Urban Area, Bexhill Suburban areas, Historic Towns and Live Well Locally area types (as defined on the Policies Map), all new dwellings shall ordinarily be located within approximately 800 metres, equivalent to around a 10-minute walk of a range of local amenities. Distances must be measured using safe and realistic active travel routes rather than straight-line distance, taking account of barriers, gradients, crossing points, route quality and accessibility for all users.

4. In Village and Countryside area types, all new dwellings must be located within a reasonable active travel distance of a range of local amenities appropriate to the scale and function of the settlement and the development. Distances greater than 800 metres will be acceptable where justified by local context, the scale and nature of the development, the availability of services, and the role and relationship of the site to nearby settlements. Where the range of local amenities accessible by active travel is more limited development must, where possible, demonstrate that residents would have access to regular and reliable public transport connections to nearby centres where a wider range of amenities are available.

Public transport access

5. A public transport stop with a frequent, reliable service is a local amenity or service within the meaning of criteria (1) of this policy, where it is within approximately 400 metres or a 5-minute walk of new dwellings in the Bexhill Urban Area, Bexhill Suburban areas, Historic Towns and Live Well Locally area types, or approximately 800 metres in the Village and Countryside areas.

6. Public transport access will not, by itself, justify development in an otherwise unsustainable location, but may form part of the overall assessment where active travel access to some everyday amenities is limited and where regular, reliable and convenient services are available or can be secured as part of the development.

7. Policy LWL3 sets out additional requirements for active travel and public transport connections for residential development of 10 or more dwellings.

Indoor meeting places

8. In addition to the requirements above, development proposals of 250 dwellings or more, and smaller proposals forming part of a wider planned growth area must provide or contribute proportionately to a digitally connected, flexible and multifunctional indoor meeting place, where this is

necessary to meet needs arising from the development or wider planned growth area.

9. Provision may be made through the enhancement of an existing facility where it is accessible from the site and has capacity to meet the needs arising from the development, or through the provision of a new facility.

10. Indoor meeting places must be designed to be accessible, adaptable and resilient to climate change, including by providing a comfortable internal environment during periods of extreme heat.

Key evidence and/or guidance:

- National design guidance (including the National Design Guide (2021), National Model Design Code and successor Design and Placemaking Planning Practice Guidance)
- Building for a Healthy Life (2026)

6.25 The NPPF[118] supports sustainable development by seeking strong, vibrant and healthy communities, well-designed and safe places, and access to services and open spaces that meet current and future needs.

6.26 Policy LWL2 applies to all proposals for new residential development throughout the district (including that arising from conversion or change of use) and uses the Area Types introduced in Policy LWL1 (Efficient Use of Land & Appropriate Densities) and shown on the Policies Map. It seeks to ensure that new homes are located and planned to provide realistic access to everyday amenities and services, in line with the Local Plan's Overall Priority of "Live Well Locally". References to active travel have the meaning set out in Policy LWL3 (Active Travel, Public Transport Connections & Services Outside the Site) and the Glossary.

Relationship to the development boundaries

6.27 Bexhill Urban and Suburban, Historic Towns, Live Well Locally and Village Area Types relate to land largely within defined Development Boundaries. Policy LWL2 does not alter the presumption in that infilling, redevelopment and changes of use within development boundaries will be acceptable, subject to other Local Plan policies (as set out in Policy SS2). Where a site within a development boundary has poor access to amenities or connections, Policy LWL2 provides a basis to require proportionate

[118] NPPF (2024) paragraphs 7 and 8.

improvements, such as additional amenities on larger sites or improvements to the active travel network.

6.28 Policy LWL2 also does not alter the approach to development in the countryside, set through Policies SS2 (Development Boundaries) and SS4 (Strategy for the Countryside). Instead, it provides a mechanism to assess residential proposals that are supported by other Local Plan policies, such as Policy HOU3 on rural exception sites and Policy HOU11 on new dwellings in the countryside.

Implementation

6.29 In the Live Well Locally Area Types, which comprise planned urban extensions on the edges of Bexhill and development sites on the fringes of Hastings, sites coming forward earlier in the Plan period may not benefit from an existing range of local amenities. New development may initially rely on existing nearby centres or public transport connections where these are available within a reasonable distance. However, development will be expected to deliver or contribute to new or enhanced local facilities through a coordinated masterplanning approach, so that these areas evolve into fully functioning, walkable neighbourhoods over time. This includes, where applicable, infrastructure required by relevant area policies, including Policies BX16 and BX27, and their associated masterplans.

6.30 In Village and Countryside area types, the availability and distribution of services will vary, and it may not always be possible to achieve access to a full range of amenities within walking distance. Some car use will remain necessary in more rural and dispersed areas, but development should still maximise opportunities for active travel, convenient access to public transport and nearby service centres, and more sustainable travel choices. Other locations within Village and Countryside area types may be more closely related to existing towns or planned growth areas. New development in these locations must achieve a standard of accessibility appropriate to its scale, location and relationship to nearby services, and must not rely on rural flexibility to justify poor access to services.

6.31 A sufficient range of local amenities will normally comprise a combination of everyday facilities, proportionate to the scale of development and the role and function of the settlement. Relevant facilities may include (but not be limited to): food shops selling fresh fruit and vegetables, publicly accessible parks or green spaces, indoor meeting places such as pubs, cafes, community centres, places of worship or cultural venues, primary schools, post offices or banking services, GP surgeries, public transport stops and mobility hubs.

6.32 In assessing whether a sufficient range of amenities is available, the Council will have regard to the role and function of the settlement, the number and type of amenities within realistic active travel distance, how far those amenities meet every-day needs, the scale of development and likely population generated, the quality and accessibility of routes, and whether planned or secured improvements will be delivered in step with occupation.

Active travel and accessibility

6.33 For the purposes of this policy, safe and usable active travel routes are those that are direct, continuous, accessible to all users and attractive to use. This includes consideration of footway provision, crossing points, gradients, natural surveillance, lighting where appropriate, and barriers such as high traffic speeds or volumes. This reflects national guidance, including Active Travel England guidance, on the importance of direct, connected and inclusive routes.

6.34 Routes that are unsuitable for wheelchair users, people with pushchairs or older people, poorly overlooked, or severed by busy roads lacking safe crossings, should not normally be treated as providing realistic access, even where the measured distance falls within the relevant benchmark.

6.35 The 800-metre threshold provides a benchmark for walkable access to services, equivalent to approximately a 10-minute walk. In rural areas, distances are likely to be greater due to dispersed settlement patterns, but development will still be expected to demonstrate that access to services is realistic and convenient, taking account of route quality, topography and the needs of different users.

Community facilities and indoor meeting spaces

6.36 Community facilities such as halls, shops, healthcare facilities, pubs, village squares and other local amenities can help provide a focus for the Live Well Locally concept by acting as neighbourhood activity centres and, where appropriate, mobility hubs.

6.37 Indoor meeting places may include new or improved village halls, community buildings or other flexible facilities. They should be suitable for a range of uses, including co-working, community events, markets, training, social prescribing and other community activities, and should be designed to provide comfortable internal conditions, including during periods of extreme heat.

6.38 The 250-dwelling threshold reflects the point at which development is likely to generate additional demand for flexible community, meeting and co-working space. The requirement will be applied proportionately, having regard to existing provision, capacity, accessibility and the relationship of the site to wider planned growth.

6.39 Further guidance on the design, quality and management of public spaces, green infrastructure and recreational facilities, as set out elsewhere in the Local Plan.

Public transport access

6.40 Convenient access to public transport depends on the distance to stops, the quality, safety and accessibility of active travel routes, the frequency and reliability of services, and the destinations served.

6.41 In well-connected urban environments, convenient access to public transport will typically mean that each dwelling has access to stops within around 400 metres by a safe, direct and accessible active travel route. Longer distances will be appropriate for higher-order public transport, such as rail, particularly where services provide frequent or fast connections to a range of destinations. In such cases, distances of approximately 800 metres to 1.2 kilometres may still provide a realistic and attractive alternative to private car travel, where routes are safe, direct and high quality.

6.42 In village and countryside locations, greater distances will be acceptable where justified by dispersed settlement patterns, lower densities, limited-service availability and local context. As a guide, services operating at least hourly during the day on most days of the week are more likely to support sustainable travel patterns, although this will depend on the specific context and destinations served.

Mobility hubs

6.43 Where justified by the scale and location of development, proposals may support mobility hubs to enable convenient interchange between active travel and public transport. Mobility hubs may include secure cycle parking, information, seating, lighting, links to bus stops or community transport, facilities for users of mobility aids, shared mobility, parcel collection, electric vehicle charging and real-time information.

Policy LWL3: Active Travel, Public Transport Connections & Services Outside the Site

Status	Strategic
Priorities	Live Well Locally, Green to the Core, Thriving Local Economy
Strategic Objectives	7, 8, 9

1. For the purposes of this policy, and other policies in this Plan where the term is used, "active travel" means walking, wheeling and cycling, and, where appropriate, horse riding. Wheeling includes the use of wheelchairs, mobility scooters and other mobility aids.

2. All development must protect the continuity, safety, accessibility and usability of existing active travel routes and access to public transport and must not create or worsen barriers to active travel.

Active travel and public transport connections and services

3. All residential development proposals of 10 or more dwellings must provide, or where necessary contribute proportionately to, direct, safe, comfortable, attractive and inclusive active travel routes from the site boundary to:

   a. Existing or proposed public transport stops served by a frequent and reliable service, or where such a service will be secured as part of the development; and

   b. The wider active travel movement network which provides access to services and facilities outside the site.

4. Residential development of 50 or more dwellings must additionally provide comprehensive and integrated connections between the site's internal active travel network and the surrounding movement network, including multiple connections from the site boundary.

5. Proposals for major non-residential development likely to generate significant travel demand must also provide, or where necessary contribute proportionately to, direct, safe, comfortable, attractive and inclusive active travel connections to public transport and the wider movement network, together with any necessary and proportionate improvements to public transport services or infrastructure.

6. Routes and connections required by this policy may include the provision of new routes or the improvement or extension of existing routes. Public Rights of Way must be retained in accordance with Policy ENV15. Active travel routes, crossings, junctions and transitions must form a continuous and legible network and be designed having regard to the latest Local Transport Note 1/20, the Active Travel England Rural Design Guide and any successor guidance.

7. The active travel and public transport requirements arising from a development will be proportionate to its scale, location and likely travel impacts, evidenced by proportionate transport evidence, which may include a Transport Statement or Transport Assessment as appropriate. The measures proposed must, where relevant, support the delivery of local transport strategies and plans, including the East Sussex Local Cycling and Walking Infrastructure Plan.

8. Where the frequency, reliability or convenience of existing public transport services is insufficient to serve the development (as per policy criterion 3a), but the location is otherwise acceptable having regard to the spatial strategy and Policies LWL1 and LWL2, proposals must secure necessary and proportionate improvements or contributions.

Coastal access

9. All development affecting coastal access must retain public access to the coast and, where opportunities arise, enhance it.

10. Development affecting the King Charles III England Coast Path National Trail must protect its continuity, safety, setting and accessibility.

Key evidence and/or guidance:

- Active Travel England Rural Design Guide (2026)
- Local Transport Note 1/20
- Infrastructure Delivery Plan
- East Sussex Local Cycling and Walking Infrastructure Plan (2020)
- East Sussex Local Transport Plan 4 (LTP4 2024–2050)

6.44 The Local Plan Transport Assessment and Infrastructure Delivery Plan identify mitigation and coordinated transport measures to support planned growth and the Council's climate, health and wellbeing objectives. Integrating transport and land-use planning is key to reducing carbon emissions and supporting healthier, more sustainable travel choices.

6.45 Policies LWL1, LWL2 and LWL3 should be read together. Policy LWL1 supports compact, design-led development; Policy LWL2 seeks realistic access to everyday facilities

and services; and Policy LWL3 secures the active travel and public transport connections and services needed to create sustainable, inclusive and healthy places. Part (A) applies to residential development of ten or more dwellings and non-residential development likely to generate significant travel demand. Part (B) applies to all development affecting coastal access.

6.46 This policy principally applies to connections from the site to the surrounding movement network. For residential development subject to the enhanced requirements set out in the Policy, in Part (A), it also addresses how the site's internal active travel network connects with the surrounding network. The detailed provision and design of active travel and public transport infrastructure within the site are addressed by Policy LWL4.

6.47 The policy applies a graduated approach. Development of 10 or more dwellings is expected to secure safe and convenient links to public transport and the wider movement network. Development of 50 or more dwellings is expected to deliver a more comprehensive and integrated network of active travel connections, reflecting the greater number of trips generated and the wider opportunities for network improvement.

6.48 Active travel routes and links should be planned and designed as part of a connected and inclusive movement network, reflecting local context, user needs, safety, accessibility and the function of each route.

Sustainable movement

6.49 Development to which Part (A) applies should be supported by direct, safe, comfortable, attractive and inclusive active travel routes to existing or planned public transport stops and, where available, wider hubs such as train stations and bus interchanges. This supports compact development by enabling more journeys to be made by sustainable modes, particularly in higher-density and well-connected locations. Where the frequency, reliability or convenience of existing public transport services available from nearby stops is insufficient to serve the development, proposals will also be required to make necessary and proportionate improvements or contributions to public transport services and/or infrastructure such as bus stops, as part of the development. Access to public transport should be considered as a complete journey, including the route to the stop, any necessary crossing and the accessibility and safety of the waiting and boarding environment.

6.50 Development to which Part (A) applies should also be supported by safe, direct and accessible links to existing active travel routes. The length and nature of such links will vary depending on the location and scale of the development but should result in a safe route from the site to join with the existing active travel movement network outside the site. Where the existing active travel network outside the site is of an insufficient quality to provide a safe and accessible route to services and facilities, necessary and proportionate improvements will be required as part of the development.

6.51 Wherever possible, development to which Part (A) applies should connect to or contribute to the delivery of routes identified through the Infrastructure Delivery Plan, adopted Local Cycling and Walking Infrastructure Plan, the East Sussex Local Transport Plan and other relevant local transport strategies. Emerging plans may be considered where they have reached a sufficiently advanced stage and are supported by proportionate evidence.

6.52 Development proposals should be supported by proportionate transport evidence, such as a Transport Assessment or Transport Statement, to assess impacts, promote sustainable travel and identify necessary mitigation. For major development, a Travel Plan will also usually be required to encourage active travel and public transport use over time.

6.53 Early engagement with the local planning and highway authorities is encouraged to agree the scope of transport assessments and supporting information, having regard to relevant Highway Authority and /or National Highways guidance. Transport Assessments or Statements should consider all modes and users, including active travel and public transport, and include both quantitative and qualitative analysis of likely travel patterns, accessibility to key destinations and infrastructure deficiencies. Assessments should consider the needs of all users, including children, older people and disabled people, and may use tools such as a Non-Motorised User Audit or equivalent to identify barriers and inform improvements. Proposals should clearly set out and justify infrastructure improvements and measures to support increased active travel.

Route quality and design

6.54 Routes and links should be safe, direct or reasonably convenient, continuous, accessible and easy to navigate. Design should take account of gradients, surfacing, lighting, crossings, traffic speeds, personal safety, flood risk and drainage, and should minimise conflict between pedestrians, wheelers, cyclists, equestrians and motor vehicles. Appropriate crossing provision should be located along expected desire lines where

necessary to create safe, convenient and inclusive routes. The form of crossing should respond to traffic speeds and volumes, route use and the needs of different users.

6.55 Active travel routes should be inclusive and comfortable to use throughout the year and designed to be usable by a wide range of people, including older people, children and disabled people and, where appropriate, equestrians. New or improved pedestrian routes should normally provide step-free access, appropriate surfacing, lighting where demonstrated to be necessary for safe, inclusive and legible use, and navigable features for people with visual, mobility or other access requirements. The need for lighting should be assessed by balancing safe and inclusive year-round use with biodiversity, landscape character and dark-skies considerations, having regard to the Active Travel England Rural Design Guide and the relevant Local Plan lighting policy. Where a fully step-free route cannot reasonably be achieved, an accessible alternative should be provided wherever practicable. For longer, strategic or heavily used routes, provision should be considered for appropriately spaced seating and rest points, shade and drinking water, having regard to the route's function, expected use, local context and long-term maintenance.

6.56 In urban and suburban locations, shared walking and cycling provision will not normally be appropriate on busy routes or where pedestrian and cycle flows are likely to create conflict. Segregated or protected cycle provision should normally be provided along busy streets where necessary to achieve safe and attractive cycling conditions. Shared-use routes should only be used where consistent with LTN 1/20 and where they would not compromise pedestrian comfort, accessibility or safety.

6.57 New routes should form part of a connected network linking existing and proposed infrastructure and key destinations. Existing routes, including Public Rights of Way, should be positively integrated into the layout and enhanced where necessary, so that they form part of a safe, attractive and coherent movement network. Development should also support the delivery of Greenways, Quietways and improvements to Public Rights of Way where these form part of an identified active travel network or would improve access to key destinations.

6.58 Access to rail stations should be supported by high-quality active travel routes and integration with the wider movement network. Where necessary, proportionate and deliverable, development should provide or contribute to secure cycle parking and other associated improvements. In some locations, measures such as parking management or traffic calming may also be required to ensure routes operate safely and effectively.

Coastal access

6.59 Where development affects the King Charles III England Coast Path National Trail, opportunities to improve access may include appropriate route enhancement or realignment where this would improve proximity to the coast, accessibility for all users and overall route quality.

Guidance and policy links

6.60 Development proposals should demonstrate how relevant national guidance and standards for active travel, including Active Travel England guidance and LTN 1/20, have informed the design of routes and connections beyond the site. This should be considered alongside Policy LWL2, which addresses access to local services and facilities.

Rural context and flexibility

6.61 In rural areas, opportunities to deliver active travel and public transport infrastructure will vary. Development should promote sustainable travel through context-appropriate measures, including improving existing routes, strengthening connections to nearby settlements and supporting shared or community transport where appropriate.

Recreation and tourism routes

6.62 In rural areas, active travel routes may also support recreation and tourism. Development should, where relevant and proportionate, enhance connections to the wider rights of way network and other recreational routes, including through improvements to existing routes and the creation of new links between settlements, the countryside and key destinations.

Policy LWL4: Active Travel & Public Transport Within Sites

Status	Strategic
Priorities	Live Well Locally, Green to the Core
Strategic Objectives	8, 9

1. Development proposals that create or materially alter streets, routes or movement networks must provide a coherent, direct, safe, inclusive and legible movement network that prioritises active travel and access to public transport and connects effectively with surrounding streets, routes and facilities. Development proposals must:

Connections and desire lines

2. Respond to active travel desire lines and provide direct, convenient and accessible connections within the site and to surrounding streets and routes, public transport stops, local facilities and neighbouring areas;

Connected streets, paths and routes

3. Use simple, connected and legible street and route patterns. Streets and active travel routes must be as direct and legible as practicable, and active travel routes must be at least as direct and convenient as equivalent routes by private car and, where practicable, more direct and convenient. Cul-de-sacs and other severed layouts will not be supported where safe and practical connections can be made. Development must provide continuous publicly accessible streets or active travel routes to and along site edges where this would improve permeability, avoid unnecessary detours or better integrate the site with adjoining areas.

Safe and inclusive movement

4. Ensure routes, access points, crossings and junctions are safe, inclusive, overlooked, accessible to all users and easy to navigate, and are designed having regard to relevant national and local guidance;

Through traffic

5. Use filtered permeability or other appropriate measures where necessary to prevent private vehicles using the site as a shortcut for longer journeys, while maintaining direct access for active travel, public transport and emergency vehicles;

Future connections

6. Enable direct active travel connections to adjoining allocated, planned, proposed or otherwise reasonably foreseeable development, including by providing routes to site boundaries and safeguarding connections where adjoining land is undeveloped.
Key evidence and/or guidance: • Streets for a Healthy Life (2022) • Manual for Streets • East Sussex County Council Guidance on Parking at New Developments 2024

6.63 Policy LWL4 focuses on movement within development sites and should be read alongside Policy LWL3 (Active Travel, Public Transport Connections & Services Outside the Site), which principally addresses active travel and public transport connections beyond the site, and Policy LWL7 (Streets & Public Realm for All), which addresses the detailed design of streets and public spaces.

6.64 Streets and routes must connect homes, jobs, facilities, public transport stops, open spaces and surrounding routes in the most direct and convenient way practicable. Internal layouts must make active travel and access to public transport attractive, safe, accessible and easy to understand. They must respond to likely desire lines and use simple, connected and legible street and route patterns. Routes should normally be well overlooked and integrated with active frontages and the wider public realm.

6.65 Filtered permeability means designing places so that active travel and public transport can move through the site more directly than private motor vehicles. This helps discourage unnecessary through-traffic, supports active travel and can create safer, quieter and more attractive streets, while maintaining a connected, convenient and attractive movement network.

6.66 Active travel routes must be safe, inclusive and easy to navigate for people of all ages and abilities, having regard to relevant national and local guidance. Site layouts must safeguard opportunities for future connections to adjoining land, including land that is allocated, proposed, planned or likely to come forward later, where these are necessary to create a coherent movement network. Routes to the site boundary must be provided where appropriate to enable those future connections.

Policy LWL5: Well-designed and Distinctive Places

Status	Strategic
Priorities	Live Well Locally, Green to the Core
Strategic Objectives	1, 3, 4, 9, 11

1. All development proposals must achieve high standards of design and create well-designed, distinctive places. Proposals must meet the following criteria, with the level of detail required proportionate to the scale, nature and location of the development.

Context, character and local distinctiveness

2. Development must demonstrate a clear understanding of site context, settlement pattern, streetscape and landscape character, townscape and local distinctiveness, including how site constraints and opportunities may change in response to climate change. It must conserve, enhance and where appropriate draw inspiration from this context, whether using traditional or contemporary design approaches.

Design concept, materials and landscape design

3. Development must be informed by a clear design concept and be visually attractive. The design concept must inform the layout, form, appearance, landscape design, choice of materials, finishes and detailing, and must be demonstrated through proportionate design information submitted with the planning application. Buildings and spaces must contribute positively to the composition and visual character of the development and its surroundings.

High Weald National Landscape

4. Development within the High Weald National Landscape, or affecting its setting, must respond positively to its distinctive landscape character, settlement pattern and scenic beauty, in accordance with Policy LAN2 (High Weald National Landscape) and, where relevant, the High Weald AONB Housing Design Guide.

Existing assets and site features

5. Development must retain and integrate existing site assets, including mature trees, hedgerows, ponds, watercourses, natural drainage routes, landscape features, heritage features, important views and topography, as anchor features within the layout and design, unless their loss is clearly justified.

Futureproofing and safeguarding

6. Development must use land efficiently and be designed so as not to prejudice future connectivity, climate resilience or the coordinated development of adjoining land, where development of that land is allocated, planned, proposed or otherwise reasonably foreseeable.

Materials, circular economy and bioregional design

7. Development must, proportionate to its scale and nature, use durable, repairable, low-carbon and responsibly sourced materials that respond positively to local character, landscape context and whole-life carbon impacts. Development should, proportionate to its scale and nature, prioritise the retention, reuse and recovery of materials.

8. Where appropriate to the site context, design approach and building function, development should facilitate the use of local and certified well-managed timber.

Stewardship and long-term management

9. Major development, and other development where significant shared spaces, community assets, green and blue infrastructure, sustainable drainage, play space or other communal assets are proposed, must demonstrate proportionate arrangements for their long-term management and maintenance.

Design assessment frameworks

10. Planning applications for major residential development must include a Building for a Healthy Life assessment. Smaller residential development is encouraged to apply Building for a Healthy Life proportionately, while major non-residential and major mixed-use development must demonstrate how relevant Building for a Healthy Life principles and any other appropriate design assessment frameworks have informed the design.

11. Major development, and other development involving significant green and blue infrastructure, must demonstrate proportionately how the principles of Building with Nature, or successor documents, have informed its design, delivery and long-term management.

Key evidence and/or guidance:

- National design guidance (including the National Design Guide (2021), National Model Design Code and successor Design and Placemaking Planning Practice Guidance)

- Building for a Healthy Life (2026)
- High Weald AONB Housing Design Guide (2019)
- East Sussex and Brighton & Hove Local Nature Recovery Strategy (2026)
- East Sussex Joint Strategic Needs Assessment (JSNA) 2026

6.67 New development should create places that are memorable, well-designed and locally responsive. Distinctiveness should be rooted in a clear understanding of context, but this does not mean copying existing forms or details where these would not produce high-quality design.

6.68 Where distinctive local characteristics exist, proposals should draw on more than architectural style or detailing. Positive local character can arise from street and block structure, plot pattern, landscape, green and blue infrastructure, land uses, building form, massing, materials and the social life of public spaces. Development should create the physical conditions for activity, social interaction and everyday use to happen, helping to bring places to life.

6.69 Where the local context is poor, generic or weakly defined, this should not be used to justify more of the same. Standard house types, poor pastiche or replication of low-quality recent development will not normally create a well-designed or distinctive place. In such cases, inspiration may be found in local history, landscape, culture, settlement form, materials and the wider character of the area.

6.70 Policy LWL5 applies to all development proposals. The level of detail required to demonstrate compliance with the policy will be proportionate to the scale, nature and location of the proposal. Smaller schemes will not be expected to provide the same level of supporting information as major development, but they must still demonstrate a clear and positive response to context, local distinctiveness, design quality and relevant site features.

Futureproofing and safeguarding

6.71 Criterion v) seeks to ensure that development does not result in piecemeal layouts that unnecessarily constrain future connections or the coordinated development of adjoining land. It does not establish support in principle for development on adjoining land or alter the role of development boundaries under Policy SS2. The need to safeguard coordinated development will apply where development of adjoining land is allocated, planned, proposed or otherwise reasonably foreseeable. Policy LWL4 sets out more detailed requirements for safeguarding future active travel connections to adjoining development.

Where Policy DEV2 applies, these matters should be addressed through the comprehensive masterplan for the wider site.

Applying distinctiveness in different contexts

6.72 Distinctiveness will be expressed differently across Rother's urban, suburban, Live Well Locally, historic towns, village, and countryside locations. In urban and suburban areas, proposals should respond to townscape character, street patterns, block structure, building line, scale, massing, materials, public realm and relationships with existing centres, public transport and active travel routes. Within Live Well Locally Areas, which comprise planned urban extensions, development should establish a coherent and distinctive new character that responds to the adjoining settlement and landscape context, while creating a well-connected, legible and walkable neighbourhood.

6.73 In villages and countryside locations, proposals should respond to settlement pattern, landscape character, topography, field boundaries, trees, views, heritage assets, vernacular materials, dark skies, tranquillity and the transition between built form and the wider countryside. In the High Weald National Landscape, or where its setting is affected, particular regard should be had to its distinctive landscape character, settlement pattern and routeways and, for residential development, to the High Weald AONB Housing Design Guide or successor guidance.

6.74 Understanding context should include consideration of how climate change may affect site constraints and opportunities over time, including flood risk, surface water management, overheating, shade, drought, tree health, habitat resilience and the role of green and blue infrastructure.

Design concept and materials

6.75 A clear design concept should explain how the proposal has evolved from an understanding of the site, its context, constraints and opportunities, and how this has informed the layout, form, appearance, materials, details and landscape design. The level of information required will depend on the scale, nature and location of the proposal. For major development, this will normally be set out in a Design and Access Statement, supported where appropriate by a masterplan, design code, landscape strategy or other design material. For outline applications where Policy DEV2 applies, the design concept must be reflected in the masterplan and parameter plans required by that policy so that the key design and placemaking principles are secured while allowing appropriate

flexibility for subsequent reserved matters. For smaller schemes, the design concept may be demonstrated through concise written material, plans, elevations, sections, materials information and other drawings sufficient to explain the design approach.

6.76 Using a local materials palette, where appropriate, can be an effective way to connect development to place. This is often more achievable and credible than mimicking traditional architectural detailing, which can depend on lost crafts or result in poor pastiche.

6.77 Brownfield sites can offer sources of inspiration for new development, including existing structures, materials, industrial heritage, landscape features and established routes. Greenfield and edge-of-settlement locations often require more creative, landscape-led design responses to avoid creating places that lack a sense of local or otherwise distinctive character.

Existing assets and site features

6.78 Existing site features such as mature trees, hedgerows, ponds, watercourses, natural drainage routes, field boundaries, views and topography can provide a strong starting point for distinctive design. They should be used to structure layouts, shape movement routes, define public spaces and strengthen landscape and ecological character.

6.79 Sustainable drainage should be integrated from the outset as part of the design concept, site layout and landscape strategy, rather than treated as a technical add-on. Existing natural drainage routes, ponds, watercourses, mature trees, hedgerows and low-lying areas can help structure development, support biodiversity, manage surface water, reduce flood risk and create distinctive green and blue infrastructure.

6.80 Detailed requirements relating to flood risk, watercourses and sustainable drainage are set out in Policies ENV1, ENV2 and ENV3; heritage assets and their settings are addressed by Policy HER1; and Policies ENV13 and ENV15 contain additional requirements for green and blue infrastructure, Public Rights of Way and historic routeways. These policies should be read alongside criterion iv) where relevant.

Materials, circular economy and bioregional design

6.81 Bioregional design responds to the natural systems, resources, materials, climate, ecology, hydrology, landscape character and local supply chains of the area. It can help reduce

whole-life carbon, strengthen local distinctiveness and support ecological and landscape resilience. In Rother, this may include opportunities to use local and certified well-managed timber where appropriate, particularly where this supports the aims and character of the High Weald National Landscape.

6.82 Development should have regard to relevant priorities and opportunities identified within the Local Nature Recovery Strategy, particularly where proposals involve habitat creation, habitat connectivity, nature recovery, tree planting, sustainable drainage, river restoration or green and blue infrastructure.

6.83 Materials should be selected having regard to durability, repairability, weathering, recyclability, embodied carbon and contribution to local distinctiveness. Materials that are short-lived, difficult to repair, visually harmful or poorly related to local character may be resisted where they would undermine design quality, sustainability or the character of the area.

Stewardship and long-term management

6.84 Well-designed places should sustain their quality over the long term. Long-term stewardship must therefore be considered from the outset, particularly where development includes shared streets and spaces, community assets, green and blue infrastructure, sustainable drainage, play space or other communal facilities.

6.85 Stewardship arrangements may include adoption by a public authority, management companies, community management arrangements or other appropriate governance models. Details of management arrangements should include the responsibilities for management and maintenance, funding and governance arrangements, and how relevant assets will remain safe, accessible and resilient over time. Management arrangements may be secured through planning conditions, planning obligations or other appropriate mechanisms where necessary.

Design assessment frameworks

6.86 Building for a Healthy Life, and any successor document, provides a framework for shaping and assessing residential development, including how proposals respond to context, create well-structured streets and spaces, provide movement choice and support healthy and inclusive places. Its themes align closely with the Live Well Locally policies.

6.87 Major residential development is required to submit a Building for a Healthy Life assessment. Smaller residential schemes should apply the framework proportionately and may choose to submit a concise assessment or otherwise explain how relevant principles have informed the design. Building for a Healthy Life should be used from an early stage to identify issues and improve proposals rather than as a tick-box exercise.

6.88 For non-residential and mixed-use development, relevant Building for a Healthy Life principles and other appropriate design assessment frameworks must be applied proportionately where relevant to the nature of the proposal. Sport England's Active Design principles, or successor guidance, may be particularly relevant in considering physical activity, active travel and social interaction. A separate Active Design assessment will not normally be necessary for residential development where these matters are adequately addressed through the Building for a Healthy Life assessment.

6.89 Building with Nature, or successor standards, provides a complementary framework for the planning, design, delivery and long-term management of high-quality green and blue infrastructure. It is particularly relevant to major development and other proposals involving significant green and blue infrastructure, sustainable drainage, biodiversity or climate-resilience measures.

6.90 Building for a Healthy Life assessments may be prepared by the applicant or design team, although independent assessment may be appropriate for larger or more complex schemes.

6.91 Independent design review will be required for strategic site allocations and other significant development where justified by the scale, complexity, prominence or sensitivity of the proposal. Independent design review provides an objective assessment of development proposals by appropriately qualified design professionals and can help improve design quality before proposals become fixed. It is separate from, but complementary to, design advice provided by the Council through pre-application discussions or a Planning Performance Agreement. It is particularly valuable for strategic sites and other proposals where scale, complexity, prominence or sensitivity creates significant design or placemaking issues. Where a Planning Performance Agreement is in place, the need, scope and timing of any independent design review should normally be agreed at an early stage and integrated into the agreed programme.

6.92 In applying these design frameworks, applicants should also have regard to the health and wellbeing priorities and health inequalities in the latest East Sussex Joint Strategic Needs Assessment (JSNA) and local public health evidence.

Policy LWL6: Built Form

Policy Status	Strategic
Overall Priorities	Live Well Locally
Strategic Objectives	1, 3, 4, 9, 11

1. All development proposals must achieve a built form, layout and orientation that responds positively to landscape, townscape, settlement pattern, site conditions and climate, creates safe, legible, inclusive and energy-efficient places, and makes efficient use of land.

2. Proposals must meet the following criteria, with the level of detail required proportionate to the scale, nature and location of the development.

    a. **Landscape, levels and drainage.** Buildings, streets, spaces, drainage infrastructure and green and blue infrastructure must respond to and positively integrate topography, natural flow routes, watercourses, ditches, ponds and other relevant site features. Where relevant, development should be informed by a landscape, levels and drainage strategy that helps determine the capacity and layout of the site.

    b. **Orientation, microclimate and energy.** The orientation of buildings, streets and spaces must respond to settlement pattern, site conditions, landscape and townscape character, microclimate, views, existing features, natural surveillance, passive solar gain, overheating risk and opportunities for low-carbon and renewable energy generation.

    c. **Legibility, street hierarchy and variation.** Development must create a legible built form through the arrangement of streets, routes, buildings, spaces, landmarks, views, building lines and materials. Built form, landscape structure and retained site features must help people understand and move through the development easily.

    d. Major development, and other development creating a network of streets or public spaces, must provide a clear street hierarchy and meaningful variation between street types, reflecting their place,

movement and access functions, spatial character, enclosure, landscape and relationship with buildings and public spaces.

e. **Building lines, enclosure and active frontage.** Buildings must define and positively address streets, routes and public spaces, creating coherent, well-enclosed and attractive street edges.

f. Non-residential development dominated by individual buildings or parcels set behind surface-level car parks will not be supported where this would undermine streetscape quality and enclosure, active frontage, pedestrian movement, landscape quality or efficient use of land.

g. **Spacing and transitions.** Spacing between buildings, and transitions between existing and new development, must be deliberate and well resolved, having regard to building height, typology, massing, amenity, local character and townscape or landscape context. Unnecessarily gappy layouts, including repeated narrow or residual spaces between detached or semi-detached dwellings that undermine local character street enclosure, energy efficiency, or landscape quality will not be supported.

h. **Settlement edges and countryside integration.** New settlement edges must be positive, outward-facing and well-integrated with both the existing settlement and the countryside, responding to landscape character, topography, field patterns, trees, hedgerows, views, routeways and wider green and blue infrastructure. Hard, defensive or poorly integrated backs of development should be avoided. Development within the High Weald National Landscape, or affecting its setting, must have regard, where relevant, to the High Weald AONB Housing Design Guide, or successor guidance.

Key evidence and/or guidance:

- High Weald AONB Housing Design Guide (2019)
- CIBSE TM59: Overheating Risk in Dwellings – A Design Stage Methodology (2026)
- National design guidance (including the National Design Guide (2021), National Model Design Code and successor Design and Placemaking Planning Practice Guidance)

Built form and landscape-led design

6.93 Built form is the three-dimensional arrangement of buildings, streets, spaces, landscape and infrastructure. It affects how places look, function, feel and perform over time. Policy LWL6 should be read alongside Policy LWL5 on well-designed and distinctive places and

Policy LWL4 on movement within sites. The level of information required to demonstrate compliance will be proportionate to the scale, nature and location of the proposal with more detailed information normally required for major development and proposals in particularly sensitive contexts.

Landscape, levels and drainage

6.94 Landscape structure, levels, topography, drainage characteristics and natural systems must inform site capacity and layout from the outset. This should include understanding how water moves through and beyond the site and identifying natural flow routes, low points, watercourses, ditches, ponds and other drainage features so that they can help structure development, open space and green and blue infrastructure.

6.95 Levels and contour information must clearly demonstrate how development will sit within the landform, minimise unnecessary cut and fill and accommodate access, drainage, buildings, streets and landscape. For major development, a SuDS Concept Design will be required, to demonstrate how surface-water management has informed the layout and landscape structure, in accordance with Policy ENV3. Foul drainage and wastewater infrastructure should also be integrated without undermining design or landscape quality.

Orientation, microclimate and energy

6.96 Orientation must form part of an integrated design response. Overheating risk should be considered from the outset, particularly for flats and other dwellings where opportunities for effective natural cross-ventilation may be constrained. Passive measures should be prioritised, including dual-aspect layouts where practicable, appropriate orientation and glazing, and external shading to limit excessive solar gains. Regard should be had to CIBSE TM59: Overheating Risk in Dwellings – A Design Stage Methodology (2026), or successor guidance.

6.97 Development must enable low-carbon and renewable energy technologies to be integrated effectively from the outset in accordance with Policies GTC1 and GTC6, including through appropriate orientation, roof form, massing and shading. Within the High Weald National Landscape and its setting, such measures should be sensitively integrated having regard to landscape character, scenic beauty, heritage significance, settlement pattern and views.

Legibility, street enclosure and active frontages

6.98 Legible places are easy to understand and move through. Clear route hierarchies, coherent building lines, corner buildings, landmarks, framed views, retained site features and logical relationships between buildings, streets and spaces can all contribute to legibility and enclosure. Perimeter blocks and defined building lines can support natural surveillance and clear public and private fronts and backs, where appropriate to local context. In rural, village or landscape-sensitive locations, a looser or more informal structure may be appropriate where rooted in settlement pattern and landscape character.

6.99 Where appropriate to their function, streets, routes and public spaces should be enclosed by active frontages. Active frontage means buildings providing overlooking, entrances, windows, activity and visual interest onto streets, routes and public spaces. Blank or inactive street-facing elevations and development dominated by surface parking, garages, fencing or walls should be avoided where they would undermine streetscape quality, natural surveillance or the public realm. Corner homes should be dual aspect, with habitable room windows overlooking both streets where practicable.

6.100 Non-residential development must similarly define and address streets and public spaces rather than being dominated by freestanding buildings set behind surface car parks which can undermine compact development, pedestrian movement, street enclosure and active frontage. Parking, servicing and access must be integrated into the layout so that buildings and landscape help define streets, routes and public spaces.

Street hierarchy and variation

6.101 Different street types help people understand and navigate a place, including by distinguishing principal streets, secondary streets, lanes, mews and more informal routes and spaces. On larger sites, meaningful variation may be created through place, movement, access, parking, drainage, utilities and lighting functions, spatial character, street width, enclosure, building typologies, building-to-street relationships, landscape strategies, tree planting, SuDS, boundary treatments, surface materials and movement priorities. Major development, and other development creating a network of streets or public spaces, must provide a clear street hierarchy and meaningful variation between street types, reflecting their place, movement and access functions, spatial character, enclosure, landscape and relationship with buildings and public spaces.

Spacing, gaps and maintenance

6.102 Spacing between buildings should support the overall built-form strategy. Close-knit built form, terraces, short rows and attached dwellings are characteristic of many Rother and High Weald settlements and can also make efficient use of land and reduce energy demand. Gaps may be appropriate where they provide a clear function, such as views, landscape structure, access, drainage, daylight, maintenance, parking or amenity, but narrow or residual gaps without a meaningful function should be avoided.

Transitions and settlement edges

6.103 Transitions between existing and new development must be carefully resolved having regard to scale, height, density, massing, building type, tenure, materials, landscape structure and relationships with streets and spaces. A sensitive transition does not necessarily require low-density development but should avoid abrupt or poorly resolved changes in character.

6.104 In villages, rural edge and countryside locations, built form and settlement edges should respond to settlement pattern, landscape character, topography, historic routeways, field boundaries, trees, hedgerows, views, dark skies and tranquillity. New edges should be designed as part of the overall layout and landscape strategy, responding both to the countryside and to the existing settlement. Rear garden boundaries may form an appropriate edge where they are positively designed and do not create blank or defensive backs to the countryside.

Compact and energy-efficient built form

6.105 Compact built form can help reduce energy demand, make efficient use of land, support walkable places and create coherent streets and spaces. Compactness must be achieved through good design and should not result in cramped layouts, poor amenity or excessive hard surfacing.

6.106 Building form also influences energy demand. Buildings with a greater external surface area relative to their internal floor area generally lose more heat; terraces, apartments, maisonettes and other attached forms are therefore more energy efficient than comparable detached forms.

6.107 Compact built form need not be urbanising where it responds to local character. In the High Weald, terraces, attached dwellings, small groups and coherent building groupings form part of the established character of many settlements. The appropriate mix of

building forms will nevertheless depend on site context, housing need, landscape, heritage and other site-specific considerations.

6.108 Consistent with Policies LWL1 and LWL6, applicants must avoid relying predominantly on large, detached dwellings of similar scale, massing, footprint and spacing where this would produce an uncharacteristic, inefficient or generic layout.

Policy LWL7: Streets and Public Realm for All

Status	Strategic
Priorities	Live Well Locally, Green to the Core
Strategic Objectives	1, 3, 8, 9

1. Streets, routes, public spaces and the public realm must be safe and inclusive for all users and must be attractive and climate resilient.

Low-speed street design

2. New and improved streets must be designed to achieve low vehicle speeds, with a design speed of no more than 20mph where motor vehicles are present. A higher design speed will only be supported where clearly justified by the movement function and context of the route, including on strategic or primary movement routes, and where agreed with the Highway Authority.

3. Speed reduction must be achieved primarily through the layout and character of the street. Signage must be used only where necessary and must avoid unnecessary street clutter.

Inclusive, pedestrian-priority streets

4. Streets must be designed in accordance with the movement hierarchy and relevant user hierarchies, prioritising pedestrians, followed by cyclists, public transport users and private motor vehicles.

5. Streets and public spaces must be accessible to people of all ages and abilities, including older people, disabled people and other people with mobility, sensory or cognitive impairments, and people living with dementia. They must support personal safety, comfort, social interaction and independent movement. Particular consideration should be given to the safety and perceived safety of women and girls and other groups who may feel vulnerable in public space.

6. Shared-space or level-surface designs will only be supported where inclusive access, legibility and safety are demonstrated.

Tree-lined streets, landscape, SuDS and green infrastructure

7. Streets must be well designed, incorporating landscaping, green infrastructure and sustainable drainage. Streets must be tree-lined where this is compatible with highway safety, accessibility, utilities and drainage. Trees must be selected and located to provide shade, cooling, biodiversity, carbon storage, visual amenity and climate resilience, with sufficient above- and below-ground space to establish and mature.

8. Where frontage parking is proposed, it must be broken up and softened by landscape, trees, planting, SuDS or other green relief so that parked vehicles do not dominate the street.

Social interaction, play and everyday public life

9. Streets and public spaces should support social interaction, rest, informal play and everyday public life. Public realm features should be well located, accessible, inclusive, safe, durable and maintainable. Where play areas, seating areas or other community spaces are provided, they must be well overlooked, accessible to all users, and connected to direct active travel routes.

Services, utilities and parking infrastructure

10. Services, utilities, lighting, signage, bin collection, cycle and e-cargo cycle infrastructure, electric vehicle charging infrastructure and related equipment must be planned from the outset as part of the street design, landscape strategy and public realm concept. These elements must be coordinated to avoid street clutter and conflicts with trees, SuDS, active travel routes, accessibility, visibility, servicing, emergency access, and future maintenance.

Healthy streets

11. Major development must demonstrate how the design has responded to relevant "Healthy Streets" indicators.

Historic streets and public realm

12. Development affecting historic streets, conservation areas, listed buildings or their settings must respond positively to heritage significance, local character and the historic public realm, in accordance with Policy HER1.

Key evidence and/or guidance:

- Streets for a Healthy Life (2022)
- Building for a Healthy Life (2026)
- Manual for Streets
- Local Transport Note 1/20
- East Sussex County Council Guidance on Parking at New Developments 2024
- RTPI's dementia and town planning guidance (2020)
- East Sussex and Brighton & Hove Local Nature Recovery Strategy (2026)
- Historic England's Streets for All: Advice for Highway and Public Realm Works in Historic Places (2018)

6.109 Streets are different from roads. They are places where the movement of motor vehicles must be balanced with the needs of people using streets for active travel, resting, playing, meeting and spending time. Streets must be designed to meet the needs of the whole community, create a sense of place and support healthy lifestyles, social interaction and everyday street life, rather than functioning only as routes for motor vehicles or places for cars to park.

6.110 The application of Policy LWL7 will be proportionate to the scale, nature and location of the development and the extent to which it creates, alters or affects streets, routes, public spaces or the public realm. Smaller developments will not be expected to provide the same level of street design information, public realm features or management arrangements as larger developments. However, all relevant proposals must demonstrate that they have responded positively to pedestrian comfort and the quality of the public realm.

6.111 LWL7 is intended to support deliverable street, access and layout solutions that respond to site-specific constraints and opportunities. Relevant constraints should be identified early and resolved through an integrated design process so that necessary vehicle access and servicing do not undermine pedestrian priority, inclusive access, low-speed design, green and blue infrastructure or public realm quality.

6.112 Applicants should have regard to Streets for a Healthy Life where relevant to the design of residential streets. The guidance should be used alongside Building for a Healthy Life, Manual for Streets, Local Transport Note 1/20 and relevant local highway and design guidance to inform street layout, street hierarchy, movement, access, parking, drainage, utilities, street lighting, landscape and public realm design.

Low-speed street design

6.113 Streets must be designed so that low speeds feel natural and self-enforcing. This can be achieved through connected and legible layouts, appropriate carriageway widths, street enclosure, changes in alignment, frequent crossing opportunities, prominent footways, street trees, planting, surface treatments and building frontage. Over-engineered layouts, excessive carriageway widths, unnecessary road markings and hard surfacing that encourage higher speeds or undermine local distinctiveness should be avoided. Speed-limit signage must not be relied upon as the main method of reducing vehicle speeds. Principal streets may need to accommodate buses, servicing and higher levels of movement but must still function as streets for people and places.

Inclusive, pedestrian-priority streets

6.114 Inclusive street design must respond to the needs of people of all ages and abilities, including children, older people, disabled people, blind and partially sighted people, people with hearing, mobility, sensory or cognitive impairments, and people living with dementia.

6.115 . Particular consideration should be given to the safety and perceived safety of women and girls and other groups who may feel vulnerable in public space. Design should consider matters such as natural surveillance, active frontages, clear sightlines, route choice, lighting where appropriate, landscaping and the avoidance of isolated or poorly overlooked spaces.

6.116 Age-friendly, disability-inclusive and dementia-friendly design should be informed by recognised best-practice guidance, such as the RTPI's dementia and town planning guidance, Alzheimer's Society resources on dementia-friendly communities, and other relevant national or local design guidance, design codes or successor documents.

6.117 Streets may serve both movement and place functions. Land adopted or maintained as highway can still be designed to provide high-quality public realm, including trees, seating, SuDS, landscape, wayfinding and space for social interaction, where this is compatible with safety, maintenance, access and adoption requirements. Long-term management and maintenance responsibilities will need to be identified at an early stage.

Tree-lined streets and landscape

6.118 Tree-lined streets provide shade and cooling, help reduce urban heat, support biodiversity and carbon storage, improve air quality, soften parking and highway infrastructure and strengthen local character. Species selection and location should respond to landscape and street character, available rooting space, soil conditions, biodiversity value, future climate conditions, disease and storm resilience, maintenance requirements and potential aeroallergen impacts. Street trees must be planned alongside utilities, lighting, SuDS, parking and highway design from the outset, with sufficient soil volume, drainage, protection from vehicle damage and space for mature canopy growth. Responsibilities for management, funding and replacement must be clear and secured where necessary.

6.119 Tree Equity principles can help identify areas where additional tree canopy would provide the greatest social, environmental and public health benefit, including areas with lower canopy cover, higher heat risk, poorer air quality or greater health inequalities. Relevant local evidence, tree canopy data and Tree Equity tools may be used where proportionate.

6.120 Fruit and nut trees may be appropriate in streets, public spaces, community orchards, courtyards or edible landscapes where they can be safely located, managed and maintained. They should be used where they contribute positively to local character, biodiversity, community food growing, education or social interaction, and where appropriate long-term management arrangements are in place.

6.121 Street trees, SuDS, habitat creation, green corridors and other green infrastructure can contribute to the priorities and opportunities identified within the Local Nature Recovery Strategy.

Landscape, SuDS and green infrastructure

6.122 Landscape and planting can provide visual interest, scent, seasonal change, sound, shade, shelter, biodiversity and opportunities for social interaction, while helping to reduce the visual dominance of parking. SuDS must be integrated into streets and public spaces from the outset as part of the landscape and public realm design rather than treated as separate engineering features. Swales, rain gardens, ditches, tree pits, permeable paving and verges can contribute to drainage, biodiversity, cooling, amenity and local character.

6.123 Green relief within frontage parking areas should be permanent and functional rather than residual space. Green relief should include at least one planted space or equivalent landscape feature broadly equivalent in frontage width to one adjoining parking bay for every four parking bays, unless a different design solution would achieve equal or greater street greening, tree planting, drainage, enclosure and visual quality. Planting beds, trees, rain gardens or verges could provide green relief.

Social interaction, play and public realm

6.124 Streets and public spaces can support everyday social interaction by providing places to sit, rest, chat, play and spend time. Seating, shaded areas and, where appropriate, public drinking water can help people use streets and public spaces comfortably, particularly during hot weather and for children, older people, disabled people and people who are more vulnerable to heat. Such features must not create clutter, obstruct movement or reduce accessibility. Play areas, seating areas and other community spaces must be safely and conveniently located, well overlooked, accessible to all users and connected to direct active travel routes rather than isolated from everyday movement.

6.125 Public art, cultural installations and heritage interpretation should be designed, procured, managed and maintained to a high standard. Where appropriate, applicants should demonstrate how artists, local communities and relevant stakeholders have been involved; and how maintenance, repair, removal or decommissioning will be managed over time.

Services, utilities, parking infrastructure and street clutter

6.126 Services, utilities, lighting, bin collection, access covers and street furniture must be considered at the earliest stage of street design. Shared trenches and common ducting can help reduce disruption, avoid conflicts and support long-term maintenance where feasible. Infrastructure must not prejudice street trees, SuDS, pedestrian movement, accessibility or the quality of the public realm.

6.127 Cycle, e-cargo cycle and electric-vehicle charging infrastructure must also be designed as part of the street and public realm layout from the outset. It must be convenient, secure and accessible and must not obstruct pedestrian movement, visibility, servicing, emergency access, prejudice trees or SuDS, or create trip hazards, accessibility barriers or unnecessary clutter. On-street and public realm charging arrangements should allow for future maintenance, management and technological change.

6.128 Servicing, deliveries, refuse collection and emergency access must be considered from the outset, but streets should not be over-engineered around infrequent large vehicle movements where this would undermine pedestrian priority, low-speed design, street enclosure, landscape, SuDS or public realm quality. Swept-path analysis should be used proportionately and should support, rather than override, the creation of safe, attractive and low-speed streets. Signage, street furniture and other public-realm elements should be coordinated and rationalised to minimise clutter and support accessibility, character and clear wayfinding.

Healthy Streets and historic streets

6.129 The Healthy Streets indicators are: everyone feels welcome; people choose to walk, wheel and cycle; people feel relaxed; easy to cross; clean air; not too noisy; places to stop and rest; shade and shelter; people feel safe; and things to see and do. Applicants should use the indicators and relevant Healthy Streets tools proportionately to inform the design of streets and public spaces.

6.130 Historic streets include streets, lanes, squares, routeways and public realm spaces that contribute positively to the significance, character or appearance of conservation areas, listed buildings, historic settlements or other heritage assets. Changes to surfacing, kerbs, lighting, signage, street furniture, trees, access arrangements and traffic management can affect heritage significance and must be considered in accordance with Policy HER1. Regard should also be had to Historic England's Streets for All: Advice for Highway and Public Realm Works in Historic Places, or successor guidance.

Policy LWL8: Multimodal Parking, Servicing and Deliveries

Status	Strategic
Priorities	Live Well Locally, Thriving Local Economy
Strategic Objectives	1, 3, 7, 8, 11

1. All development must provide safe, convenient, inclusive and well-designed arrangements for cycle and vehicle parking, servicing and deliveries, proportionate to its nature, scale, location and likely demands.

2. The amount, type and allocation of vehicle and cycle parking, and the applicable technical requirements, must be determined having regard to the latest East Sussex County Council guidance on parking at new developments, or successor documents. Any departure must be supported by site-specific evidence.

Parking and layout

3. Parking must be appropriately overlooked and well-integrated with buildings, streets, landscape, public spaces and active travel routes. Vehicles, hard surfacing and associated infrastructure must not dominate streets, frontages, entrances or public spaces. Well-integrated landscape features, trees, planting, green infrastructure, permeable surfaces and sustainable drainage should be retained or provided.

4. Any large surface car parks or frontage parking must be subdivided by buildings, trees, substantial planting or drainage features, provide safe and accessible pedestrian routes and avoid visually prominent expanses of vehicles and hard surfacing.

On-street parking

5. Where on-street parking is proposed, it must support an attractive public realm without compromising active travel, visibility or essential vehicle access, or causing unacceptable displacement onto surrounding streets, footways, verges, landscaped areas or public spaces.

Off-street parking

6. Where garages or car ports are proposed, these should be integrated with the architecture of the building and the street and must not dominate or deactivate the street.

7. Rear parking courts must be small-scale and landscape-led, normally serving no more than five dwellings. A larger court will only be supported where justified by the development context and where designed as a well-defined courtyard or mews enclosed and overlooked by active frontages and entrances. Large, isolated or poorly overlooked rear parking courts will not be supported.

Electric vehicle charging

8. Electric-vehicle charging equipment and associated infrastructure must be coordinated with buildings, pedestrian routes, parking and landscape and sensitively integrated in rural and historic environments. Where small-scale development relies on existing on-street parking, any charging solution should have regard to the requirements of the highway authority and should not result in cables or equipment obstructing footways or creating accessibility barriers.

Cycle parking

9. Development must provide secure, covered, convenient and inclusive cycle parking in accordance with the latest Highway Authority and relevant national guidance. Cycle parking must be readily accessible from the street and destination served, integrated with the building or frontage, and make proportionate provision for larger, adapted, cargo and other non-standard cycles where relevant to the nature and scale of the development. Appropriate visitor and short-stay cycle parking must be provided where relevant.

10. For houses with individual entrances, at least one of the required cycle spaces must normally be provided at or immediately adjacent to the principal entrance and be directly accessible from the street. Additional cycle parking may be provided elsewhere within the plot where it remains secure and convenient to access.

Accessible parking and inclusive access

11. Accessible vehicle parking and drop-off facilities must be provided where required, having regard to the latest Highway Authority guidance, and connected to entrances by safe, direct and step-free routes. Where electric-vehicle charging is provided, accessible vehicle parking spaces must have appropriate access to charging provision. Where relevant to the nature and scale of the development, secure, convenient and appropriately covered storage and charging should also be provided where required for mobility scooters and powered wheelchairs.

Servicing, deliveries and parcel collection

12. Development must safely and conveniently accommodate servicing, loading, deliveries, refuse collection, removals and emergency access without causing unacceptable obstruction, danger, congestion or harm to residential amenity or the public realm.

13. Flatted development, and non-residential or mixed-use development likely to generate significant delivery activity, should additionally make proportionate provision for secure parcel delivery and collection. Servicing and parcel facilities must be integrated with the layout and designed and managed to avoid obstruction, noise and disturbance.

Key evidence and/or guidance:

- East Sussex County Council Guidance on Parking at New Developments 2024
- High Weald AONB Housing Design Guide (2019)
- National design guidance (including the National Design Guide (2021), National Model Design Code and successor Design and Placemaking Planning Practice Guidance)

Applying the policy

6.131 Parking, servicing and deliveries must be treated as integral parts of place-making rather than matters addressed after buildings and streets have been arranged. The hierarchy and character of streets and public spaces must be established first, with a context-appropriate combination of on-street, on-plot and grouped or communal parking used to support the intended character, density, building types and function of each street. A single predominant parking treatment may nevertheless be appropriate where it forms part of a coherent and well-justified approach.

6.132 The latest East Sussex County Council guidance provides the starting point for determining the amount, type and allocation of parking and the applicable technical requirements. It addresses matters including parking-space dimensions, garage counting, accessible parking, cycle and powered two-wheeler parking, electric-vehicle charging and parking-capacity surveys. LWL8 does not repeat those requirements; it establishes the place-making, design, landscape and amenity outcomes expected in Rother.

6.133 A separate parking, servicing and delivery strategy should not normally be necessary where these matters are adequately addressed through a Design and Access Statement, or through other proportionate supporting information and any technical highway information required by the Local Highway Authority.

6.134 Where development is expected to rely on parking within existing streets, the assessment and any parking-capacity survey should follow the latest East Sussex County Council guidance. In Controlled Parking Zones, the availability of permits should not be assumed.

On-street parking

6.135 Well-designed on-street parking can support convenient access, street activity and lower vehicle speeds. It should normally be arranged in short runs and integrated with crossing opportunities, trees and planting. Physical design, including buildings, landscape and clearly defined bays, should discourage pavement and verge parking without unnecessary signs, bollards or high kerbs.

Cycle parking and storage

6.136 Cycle parking must be at least as convenient to access as car parking serving the same dwelling or use. Visitor and short-stay cycle parking should be as close to, or closer than, car parking and drop-off areas serving the same destination. Cycle stores should not require cycles to be carried through living accommodation or manoeuvred around parked vehicles and should accommodate larger and adapted cycles. Communal stores should be secure and appropriately overlooked without creating inactive frontages.

6.137 Convenient everyday cycle storage should be designed into the house type from the outset rather than relying solely on sheds or stores at the rear of gardens. Suitable solutions may include a generously sized entrance area or porch, an integral cycle store, or a well-designed external store incorporated into the frontage or boundary treatment, including combined cycle and refuse-storage structures where each use remains separately accessible and convenient. The space should allow a cycle to be brought in and out easily without obstructing normal access to the dwelling. Additional cycle storage may be provided within a suitably sized garage or rear garden store. Where rear storage is relied upon, direct and convenient access from the street should normally be provided so that cycles do not need to be taken through the dwelling.

Residential parking design

6.138 Car ports can support compact development, particularly where incorporated between or beneath dwellings. However, fully open car ports may expose parked vehicles and create the appearance of gaps in the built frontage, especially between semi-detached or

detached properties. Full-height, visually permeable screen gates should therefore be incorporated at the street-facing opening, or an equivalent architecturally integrated treatment provided. Vertical slats, open-jointed timber, perforated metalwork or a similarly permeable treatment can substantially screen parked vehicles while maintaining ventilation and ensuring that the structure does not read as a fully enclosed garage. The treatment should be designed as part of the architecture of the dwelling, align with the principal building line and use materials and detailing that complement the elevation. Where garages or car ports also provide cycle, refuse or other storage, they must remain sufficiently sized and convenient for those uses when a vehicle is parked.

6.139 Frontage parking can cause vehicles and hard surfacing to dominate streets, particularly on narrow plots. Side parking will often reduce its visual prominence. Rear in-curtilage parking may also be appropriate where convenient, secure and well-integrated, but not where it would require intrusive access, excessive hard surfacing or unacceptable loss of gardens, trees or landscape features. Where planning permission is required, forecourt parking in front of terraced housing and predominantly hard-surfaced front gardens will not be supported.

6.140 Parking courts require careful design because access and manoeuvring space can result in inefficient land use and extensive hard surfacing. Rear courts serving houses must normally remain small and serve no more than five dwellings, reflecting the High Weald Housing Design Guide and providing a district-wide benchmark for convenience, enclosure, surveillance and domestic scale.

6.141 Grouped or communal parking can support compact streets, terraces and communal landscape and may incorporate cycle storage, car-club spaces, charging and other shared-mobility functions. Parking squares should be designed as attractive shared spaces first, with parking integrated into their overall character rather than determining it. Landscape, trees, rain gardens, communal planting beds, seating and other appropriately located street furniture can help create useful and sociable spaces when parking demand is lower, while also providing shade, biodiversity and sustainable drainage. The layout should avoid the appearance and engineering of a conventional car park and should allow pedestrian movement and informal use to take place safely and comfortably. Communal, grouped and substantial parking areas must have suitable arrangements for establishment, management and long-term maintenance and must be designed to allow future adaptation where practicable.

6.142 The balance between allocated and unallocated parking should be informed by the East Sussex County Council residential parking calculator and the proposed dwelling mix, tenure, management arrangements and likely user needs. Excessive reliance on tandem parking should be avoided where it would be inconvenient to use or likely to result in displaced, obstructive or pavement parking.

6.143 Policy HOU13 addresses private and communal residential amenity space, refuse and recycling storage and other external household storage. Policies LWL8 and HOU13 should be applied together so that parking, storage and servicing do not compromise residential amenity.

Landscape and lighting

6.144 Parking and associated landscape and drainage must form an integral and multifunctional part of the development. Parking landscape must be multifunctional, using trees, hedges, planting, rain gardens, swales and permeable surfaces to provide shade, biodiversity, surface-water management and amenity. Frontage parking must provide the green relief required by Policy LWL7. Sustainable drainage should form part of the landscape concept rather than a separate engineering exercise, with features such as permeable paving, rain gardens and swales contributing to amenity and biodiversity as well as drainage. A simple materials palette and restrained detailing will generally create a more coherent environment than extensive blacktop, continuous kerbing, painted bay markings, signs and bollards.

6.145 Where lighting is necessary, it must provide safe, inclusive and legible access while avoiding unnecessary illumination, glare and harm to residential amenity, biodiversity, heritage, landscape character and dark skies in accordance with Policy LAN4. Lighting should respond to the function, expected use and context of the space, providing safe and legible routes without unnecessary illumination, glare or clutter. Particular care is required where lighting or parking infrastructure could affect dark skies, wildlife, heritage assets, nationally designated landscapes or nearby homes. Rural settlements, historic areas and landscape-sensitive locations require a contextual response, but this should not result in a lower standard of design quality.

6.146 Substantial surface car parks and covered parking structures should be considered for renewable-energy-generating shade structures where feasible and appropriate. These should complement rather than replace trees and planting and should be coordinated

with sustainable drainage, charging infrastructure, accessible routes and the wider landscape.

Electric vehicle charging

6.147 Electric-vehicle charging quantities and technical requirements are addressed by statutory requirements and the latest East Sussex County Council guidance. Equipment, feeder pillars, substations, signage and protective structures must be coordinated with buildings, pedestrian routes, parking, landscape and future adaptation and sensitively integrated in rural, historic and other sensitive environments.

Servicing and deliveries

6.148 Deliveries, servicing, refuse collection and removals are everyday components of development and must be integrated early without allowing vehicles, stores or equipment to dominate streets or obstruct active travel routes. Where the parcel provision required by the policy is necessary, appropriate solutions may include parcel lockers, collection rooms, concierge facilities or other managed arrangements. Consideration should also be given to access to goods for residents without a private car and to opportunities for collection points, small-scale distribution infrastructure or other forms of last-mile delivery, particularly where integrated with centres or mobility hubs.

Policy HWB1: Health Impact Assessments

Status	Strategic
Priorities	Live Well Locally
Strategic Objectives	9

HIA Screening

1. A Health Impact Assessment (HIA) screening will be required for all applications related to major development[119] located within wards that fall within the 20% most deprived nationally, according to the latest Index of Multiple Deprivation[120]. This screening process will determine if an HIA is

[119] As defined in Chapter 1 of the Local Plan.

[120] As of 2025, these are the five wards of Bexhill Central, Bexhill Sidley, Bexhill St Stephens, Eastern Rother, and Rye & Winchelsea. This may change over the lifetime of the Local Plan as the Indices of Multiple Deprivation is updated.

required and must be undertaken at an early stage in the design process to ensure that local health and wellbeing issues are identified early.

HIA

2. An HIA must be submitted with applications for development where an HIA screening has identified it as necessary in accordance with (1) above, or where development (including change of use) is equal to or exceeding:

   a. 100 dwellings (i.e. self-contained housing units); or

   b. 100 non-self-contained bedspaces (such as care homes); or

   c. 2,000 sqm of non-residential floorspace; or

   d. A site of 5 hectares.

Assessment requirement

3. Where an HIA is required, either identified through the screening process or triggered by the thresholds above, it must:

   a. commence at the initial stages of the development, with its findings and recommendations incorporated into the submitted proposal;

   b. assess both the individual and cumulative impacts of the proposal; and

   c. be submitted with outline, full, and reserved matters applications, at a level of detail proportionate to the stage of the proposal.

Key evidence and/or guidance:

- 2025 Indices of Multiple Deprivation
- East Sussex Health Impact Assessment Toolkit
- East Sussex Planning for Health, Wellbeing and Sustainability Framework
- Public Health Hot Food Takeaway (HFT) Guidance (2024)

6.149 Health and wellbeing impacts are not only influenced by an individual's behaviour, but also by the wider determinants of health which are a range of social, economic and environmental factors; examples include neighbourhood design, housing, food, green spaces and transport.

6.150 The NPPF is clear that the planning system plays an important role in facilitating social interaction and creating healthy, inclusive communities. HIAs are an important tool to achieve this. They identify the unintended health consequences of a project and the

potential health and wellbeing impacts that it might have on the local population. By bringing physical and mental health and wellbeing considerations to the fore, this policy ensures that development maximises positive impacts, minimises negative impacts, and addresses health inequalities, putting people and their health at the heart of the planning process.

Implementation

6.151 There is a wide disparity between areas of the district that are affluent and those that are deprived. The latest 2025 Index of Multiple Deprivation identifies that in Rother eight[121] lower super output areas (LSOAs) fall within the 20% most deprived nationally. These eight small scale areas primarily fall within five wards. To make the implementation of HIAs practical, this policy applies the screening at the Ward level. Development sites in built up areas of these wards tend to be smaller and do not meet the larger district-wide HIA thresholds. However, as research shows that housing quality must be improved to change relative deprivation in an area, the policy requires that all major development in the most deprived wards undertakes an HIA screening. Based on the HIA screening conclusions, the Council will determine on a case-by-case basis whether a proposal is likely to require an HIA.

6.152 The thresholds over which an HIA is required have been developed in consultation and engagement with ESCC's Public Health Healthy Places team and strike an appropriate balance, ensuring they are of a scale where there are likely to be potential for significant health and wellbeing impacts.

6.153 The submission of an HIA (or Screening where applicable) in line with this policy is a requirement of a valid application.

6.154 HIA screenings and HIAs must be undertaken at the initial stages of the development to inform the proposal and as such applicants are strongly encouraged to use the Council's pre-application service to gain input from planning officers at an early stage. An HIA should not be conducted after a planning application has been formally submitted as this

[121] These are in three LSOAs within Bexhill Sidley ward, two in Bexhill Central ward, one in Bexhill St Stephens ward, one in Rye and Winchelsea ward (covering the Tilling Green area of Rye) and one in Eastern Rother ward (covering the Camber, East Guldeford and Iden areas).

leaves less room for changes to be made to a proposal and may lead to an application being refused.

6.155 HIA screenings and HIAs should be undertaken in accordance with the East Sussex HIA Toolkit which sets out the details on requirements and the templates to be used. The Toolkit has been developed by the East Sussex Planning for Health Working Group to support the implementation of HIAs across the county and provide a consistent approach.

Policy HWB2: Managing Impacts on Community Wellbeing

Status	Strategic
Priorities	Live Well Locally
Strategic Objectives	9

1. To manage the impact of development on community wellbeing, applications for new development or change of use that have the potential to adversely affect public health and wellbeing will be assessed against the following criteria:

    a. The extent to which the proposal may harm local amenity through, for example, increased noise, odour, litter, traffic, anti-social behaviour;

    b. Its impact on active frontages and the daytime/ evening function of the local area;

    c. The existing concentration of similar uses within the locality and the potential for an over-concentration which could undermine local health and wellbeing objectives;

    d. The extent to which the proposal would exacerbate existing public health challenges in the local area, having regard to the latest available evidence and data; and

    e. The effectiveness of measures proposed to offset potential harm, as well as any demonstrable community benefits the use provides.

2. Proposals will only be permitted where it is demonstrated that any potentially harmful impacts are avoided or satisfactorily mitigated.

3. The opening times of hot food takeaways proposals may be restricted via planning condition on a case-by-case basis, where deemed reasonable and necessary to protect public health and amenity.

4. Applications for hot food takeaways within Sidley District Centre will not be supported.

Key evidence and/or guidance:

- 2025 Indices of Multiple Deprivation
- East Sussex Joint Strategic Needs Assessment (JSNA) 2026
- East Sussex Planning for Health, Wellbeing and Sustainability Framework

- Public Health Hot Food Takeaway (HFT) Guidance (2024)

6.156 The NPPF, the PPG (on *'Healthy and safe communities'*), and guidance from Public Health England support healthy lifestyles and limiting the proliferation of certain uses where evidence demonstrates an adverse impact on local health, pollution or anti-social behaviour.

6.157 Examples of uses that have the potential to adversely affect public health and wellbeing include, but are not limited to drinking establishments, hot food takeaways, nightclubs, betting shops, casinos, bingo halls, payday loan shops, amusement arcades, vaping shops.

6.158 Some of these uses benefit from Permitted Development Rights, in which case the Council has limited control over their establishment. However, some of these uses do not benefit from such rights and require a full planning application, allowing the Council to assess their impacts on a case-by-case basis.

Managing impacts on community wellbeing

6.159 While individually, proposed uses that are the subject of this policy may be acceptable, a high concentration of such uses can undermine the vitality of an area and negatively affect the physical and mental health of residents. A proliferation of these uses can negatively impact physical and mental wellbeing, generate anti-social behaviour, and harm the character of an area. For example, clusters of betting shops can create "dead frontages" during the day and may encourage behaviours that exacerbate financial stress or addiction. Applicants are therefore required to provide evidence that is appropriate and proportionate to the scale of the proposal, showing how they have addressed the criteria set out in the policy.

6.160 A key part of this assessment is the cumulative Impact and the prevention of "over-concentration." For the purposes of this policy, an ‘‘over-concentration’’ is considered to occur when:

a. The proposal would result in more than three total units within a 400m radius of the site being occupied by the uses listed above; or

b. The proposal would result in a continuous frontage of more than three of these uses (e.g., four or more units in a row).

6.161 To address public health and health inequalities, the Council will consider the specific health profile of the ward. For example, in areas where the latest Index of Multiple Deprivation (IMD) shows high levels of health deprivation, or where local data indicates significantly higher-than-average rates of childhood obesity, the Council will take a more restrictive approach. Applicants in these areas must demonstrate how their proposal will not exacerbate existing public health and wellbeing challenges, including those identified within the East Sussex Joint Strategic Needs Assessment (JSNA).

Hot food takeaways

6.162 Childhood obesity is a significant national and local health challenge. The NPPF is clear that hot food takeaways and fast-food outlets are a use that should be refused within walking distance of schools and other places children and young people congregate unless the location is within a designated town centre.

6.163 In addition to these impacts, a proliferation of hot food takeaway uses can also be harmful to the character and vibrancy of any given area. Hot food takeaways may, for example, only open in the evenings leading to an impact on an area's daytime function as a shopping area. External shutters can also make the area less attractive to visit. The Council will therefore proactively use planning conditions to restrict the operating hours of takeaways proposals across the district where reasonable and necessary to protect public health and amenity.

6.164 There is an existing high concentration of takeaways in Sidley District Centre (as defined in Policy ECO3). Sidley also contains some of the most deprived areas of the district, as defined in the 2025 Index of Multiple Deprivation. Therefore, this policy restricts further concentration of takeaways in Sidley, even if they are located within the designated district centre.

Policy HWB3: Healthcare and Other Community Facilities and Services

Status	Strategic
Priorities	Live Well Locally
Strategic Objectives	7, 9

1. To support Rother's settlements, address health inequalities, and ensure residents can "live well locally", the Council will protect existing healthcare and other community facilities and proactively support the delivery of new ones, including seeking proportionate contributions to relevant infrastructure identified in the IDP.

Delivering new and improved facilities

2. Proposals for new, improved, or replacement community facilities and services to meet local needs will be supported where they:

   a. are located in accessible locations, reflecting the context of the settlement or catchment they serve;

   b. meet an identified local need, having regard to the IDP and latest relevant evidence (including the East Sussex Joint Strategic Needs Assessment), or otherwise contribute to the vitality and sustainability of the local community; and

   c. where reasonably practicable, facilitate the co-location and the creation of community hubs that can accommodate a broad a range of community activities.

Provision on site allocations

3. Residential-led or mixed-use site allocations are required to deliver on-site community facilities or infrastructure enhancement as specified in relevant site-specific policies.

Protecting existing facilities

4. Development that would result in the loss of sites or uses currently or last used as community and social facilities and services will not be permitted unless:

a. alternative provision of the equivalent or better quality is available in the local area or will be provided and made available prior to the commencement of redevelopment of the proposed scheme; or

b. it can be demonstrated there is no reasonable prospect of retention of the current use and that no other community use of the site is suitable or viable.

The method for demonstrating compliance with part (b) is set out in Policy ECO4 (Retention of Sites of Economic or Community Value).

Key evidence and/or guidance:

- Infrastructure Delivery Plan
- East Sussex Joint Strategic Needs Assessment (JSNA) 2026
- East Sussex Planning for Health, Wellbeing and Sustainability Framework

6.165 The NPPF is clear that planning policies should "plan positively for the provision and use of shared spaces, community facilities... and other local services to enhance the sustainability of communities". It requires local plans to "guard against the unnecessary loss of valued facilities and services," ensuring that established assets are able to develop and modernize for the benefit of the community. This policy directly implements these national requirements, providing a robust framework to secure the social infrastructure necessary for Rother's future.

6.166 In the context of this policy, 'community facilities and services' comprise medical, health and social services; local shops and halls; and a wide range of arts, culture, education, leisure, recreation, religious facilities. In planning terms, this encompasses uses within the Use Classes C2, E(d) – (f), F1, F2, as well as relevant sui generis. It excludes residential care homes and nursing homes as these are considered separately through Policy HOU8.

6.167 These facilities are the essential social infrastructure that maintain the vitality of our towns and villages; they are the foundation of our Live Well Locally priority. Participation in community and social activities – whether at a community and village hall, a place of worship, an art event, or a sport venue –contribute significantly to the wellbeing and social cohesion of our local communities.

Chapter 7: Natural & Historic Environment

Landscape Character, Woodlands & Trees

Policy LAN1: Landscape Character & Stewardship

Policy Status	Strategic
Overall Priorities	Green to the Core
Strategic Objectives	3, 4

1. Management of the high quality historic, built and natural landscape character is to be achieved by ensuring the protection, and wherever possible enhancement, of the district's nationally designated and locally distinctive landscapes and landscape features.

2. The siting, layout and design of development should maintain and reinforce the natural and built landscape character of the area in which it will be located, based on a clear understanding of the distinctive local landscape characteristics.

3. Development proposals within the High Weald National Landscape, another locally distinctive landscape, or which are otherwise sensitively sited (such as on the edges of settlements) should be informed by a Landscape and Visual Impact Assessment, appropriate and proportionate to the nature and scale of the development.

4. The following nationally designated and locally distinctive landscapes and landscape features are identified:

    a. The High Weald National Landscape (see also Policy LAN2).

    b. The Romney Marshes, comprising the distinctive low-lying levels to the east of the district with particular regard to the landscape setting of Rye and Winchelsea.

    c. The Pevensey Levels, comprising of the low-lying area of wetland meadows between Bexhill-on-Sea and Hailsham in Wealden District.

    d. Nationally designated historic sites including listed Parks and Gardens, Scheduled Ancient Monuments and the Registered Historic Battlefield at Battle.

e. The undeveloped coast.

f. Open landscape between clearly defined settlements, including the visual character of settlements, settlement edges and their rural fringes.

g. Ancient Woodlands.

h. Tranquil and remote areas, including areas of dark night sky (see also Policy LAN3).

i. Other key landscape features across the district, including native hedgerows, copses, field patterns, historic field boundaries, ancient routeways, ditches and barrows, and ponds and water courses.

Key evidence and/or guidance

- East Sussex Landscape Character Assessment
- High Weald AONB Management Plan 2024-2029
- South Inshore and Offshore Marine Plan (2018)
- Rother Habitats Regulations Assessment (2026)
- ESCC Historic Environment Record
- Rother Settlement Study (2024)
- Rother Green and Blue Infrastructure Study (2026)

7.1 National planning policy requires the Local Plan set a framework for protecting and enhancing the natural and local environment, as an integral part of delivering sustainable development.

7.2 Rother's landscape is of great environmental and economic importance. It also plays an important social role by contributing to a sense of local identity, as well as supporting people's health and well-being. The landscape is a combination of cultural, historical and physical characteristics and components, which give rise to patterns that are distinctive to particular localities in the district and help to define a sense of place.

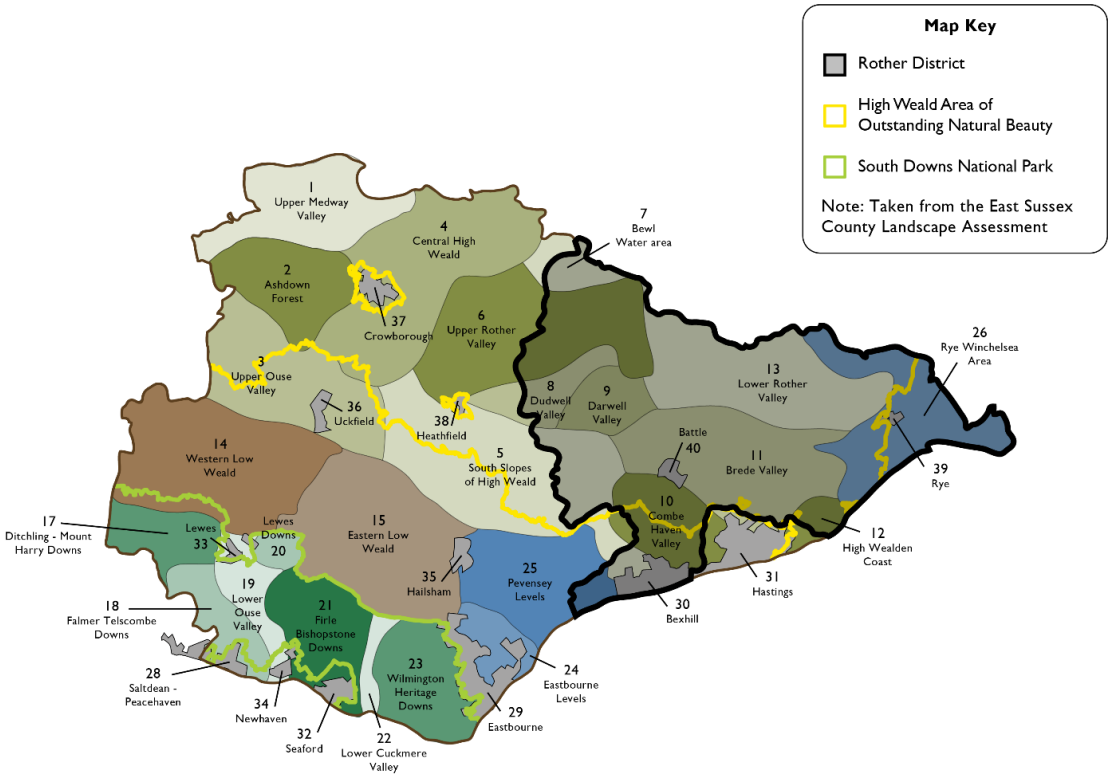
7.3 The purpose of the policy is to provide protection for areas of landscape value across the whole district, requiring development proposals to be in keeping with, and maintain and reinforce, the positive characteristics of the different areas. In addition, Policy LAN2 (High Weald National Landscape) sets reflects the importance and prevalence of the designated AONB within Rother.

7.4 The East Sussex Landscape Character Assessment (LCA)[122] provides detailed descriptions of the distinctive landscape character areas at a local level, reflecting the particular pattern of elements derived from geology, landform, topography, flora and fauna, physical features and settlement. The LCA Index Map, as it relates to Rother is reproduced below, Figure 7.1. This illustrates that the district is made up of distinct local landscapes, indeed, Rother includes land within thirteen Local Landscape Character Areas:

- Character Area 5 – South Slopes of High Weald
- Character Area 6 – Upper Rother Valley
- Character Area 7 – Bewl Water Area
- Character Area 8 – Dudwell Valley
- Character Area 9 – Darwell Valley
- Character Area 10 – Combe Haven Valley
- Character Area 11 – Brede Valley
- Character Area 12 – High Wealden Coast
- Character Area 13 – Lower Rother Valley
- Character Area 26 – Rye Winchelsea Area
- Urban Area 30 – Bexhill
- Urban Area 39 - Rye
- Urban Area 40 - Battle

[122] East Sussex Landscape Character Assessment (2016)

Figure 7.1: Local Landscape Character Areas in Rother and the surrounding area



7.5 Each of the Character Areas has its own landscape characteristics, positive landscape attributes and pressures for change. The key features, "action priorities", opportunities for protection and enhancement, and guidelines for landscape management for each character area are identified in the LCA. This will assist applicants in identifying the important characteristics of the landscape in which a proposed development is located and should be referred to in considering development proposals, to meet the requirements of Policy LAN1.

7.6 Two predominantly rural areas with important landscape features, lying outside the High Weald NL, are the Pevensey Levels and Romney Marshes. The Pevensey Levels are a low-lying tract of reclaimed wetland to the west of Bexhill at the western edge of the district that continues into Wealden District. They are typically a flat open landscape with extensively grazed wet meadows, largely windswept with a few trees. Widely spaced roads and isolated small settlements provide a sense of remoteness in this area, which is a priority habitat due to its designation as a Ramsar site and Special Area of Conservation (SAC).

7.7 The Romney Marshes are located around Rye to the east of the district and continue into Folkestone and Hythe District. This area is typically a flat open agricultural landscape of arable fields and wet pastureland with distinctive drainage dykes, marshes and notable open skies. The area also comprises habitats of the highest nature conservation value,

being designated as a Ramsar, Special Protection Area (SPA) and SAC. There is a sharp contrast between the shingle coast, low lying agricultural land and raised cliffs in this wider area. The former sea cliffs mark the post glacial shoreline, and the Royal Military Canal can be found at the base of the cliffs. The wider area is characterised by narrow straight roads and dispersed settlements with an open character and general feeling of remoteness.

Policy LAN2: High Weald National Landscape

Status	Strategic
Priorities	Green to the Core, Live Well Locally
Strategic Objectives	3, 9

1. Development proposals within or affecting the setting of the High Weald National Landscape shall conserve and seek to enhance its distinctive landscape character, ecological features, settlement pattern and scenic beauty, having particular regard to the impacts on its core character components, as set out in the latest version of the High Weald AONB Management Plan.

2. The scale and extent of development within the High Weald National Landscape should be limited, in keeping with the landscape and settlement pattern, and designed in a way that reflects its nationally designated status as landscape of the highest quality, following the guidance in the latest version of the High Weald AONB Housing Design Guide and Colour Study.

3. Planning permission will be refused for major development[123] in the National Landscape other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest. Planning applications for major development will be considered against the relevant criteria set out in the National Planning Policy Framework.

4. Surviving evidence of the past of the High Weald shall be conserved and enhanced, for example, the remains of ancient fortification; assarts, mediaeval field systems, droveways and other traces of historic agriculture and the iron industry.

Key evidence and/or guidance

- High Weald AONB Management Plan 2024-2029

[123] For the purposes of this policy, whether a proposal is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the High Weald National Landscape has been designated or defined.

- High Weald AONB Housing Design Guide (2019)

7.8 Rother district is predominantly rural in nature, with 83% of the district being located within the High Weald Area National Landscape, which is a designated Area of Outstanding Natural Beauty (AONB) and a national asset.

Statutory protection

7.9 A National Landscape, or AONB, is an area of land protected by the Countryside and Rights of Way (CRoW) Act 2000 for its outstanding natural beauty. The CRoW Act provides that the single statutory purpose of Areas of Outstanding Natural Beauty is the conservation and enhancement of the natural beauty of the area. The CRoW Act was amended in 2023[124] to create a new statutory duty on relevant authorities (including Local Planning Authorities), requiring them to "seek to further the purpose of conserving and enhancing the natural beauty of the area" when discharging their functions in National Landscapes. The duty applies not only in considering proposals within an AONB but also for proposals affecting its setting.

7.10 "Natural beauty" is not just the look of the landscape but includes landform and geology, plants and animals, landscape features, and the rich history of human settlement over the centuries[125]. It includes landscape and scenic quality, natural heritage (species, habitats, geology and physical geography), wildness, tranquillity and dark skies, and cultural heritage (including cultural traditions and the historic and other built environment that makes the area unique). Historic England makes clear that the historic environment is fundamental to the distinctive character, sense of place and natural beauty of each AONB.[126] The High Weald AONB Management Plan 2024-2029 is the primary document defining the natural beauty of the High Weald.

7.11 The provisions of the CRoW Act are reflected in national planning policy. This policy aligns with national planning policy while making the requirements specific to the High Weald National Landscape in Rother.

7.12 It should be noted that developments for housing, commercial, renewable energy, health and well-being and tourism uses are the subject of additional separate policies in the Local

[124] By the Levelling-up and Regeneration Act (2023)
[125] Countryside Commission (2001), in National Landscapes Association Briefing Note on Applying the CRoW Act (2024)
[126] National Landscapes Association Briefing Note on Applying the CRoW Act (2024)

Plan, with the emphasis on locations outside of the High Weald National Landscape and, where appropriate, within them on a small scale, in accordance with Policy LAN2.

The High Weald National Landscape character and key issues

7.13 The High Weald National Landscape (NL) was designated as an AONB in 1983. It includes land within four counties, with 30% of its land area falling within Rother district. It is characterised by being one of the best surviving, medieval landscapes in Northern Europe. Over a quarter of its land comprises woodland, and it has the highest coverage of ancient woodland of any protected landscape. The High Weald rises above the Low Weald and contains distinctive and scattered sandstone outcrops. Main roads and settlements are sited along prominent ridgelines, with a further network of small winding lanes connecting scattered villages, hamlets and farms. The legacy of the early iron industry has resulted in extensive areas of coppice woodland and hammer ponds. Trees and vegetation have different characteristics in high forest, small woods and copses. Historic field boundaries are defined by a network of hedges and assarts (land created for arable use by clearing woodland).

7.14 The area's heavy clay soils have reduced the impact of agricultural change, in which mixed farming predominates in a quiet, small-scale pastoral landscape. The cultivation of fruit and hops together with the associated distinctive oast houses help define the area. Particularly locally distinctive building typologies and features include long sweeping catslide roofs, oast houses, timber-framed barns and other agricultural buildings associated with local historic farming practices, The built form deploys a limited palette of materials associated with the local High Weald geology, including clay tile, brick, local stone and timber in construction, and often includes hung tiles and/or white weatherboarding. It should be noted that the whole of the High Weald NL is designated for its outstanding natural beauty, and all the NL is important; any areas perceived as 'degraded' should be seen as opportunities for the enhancement of natural beauty, contributing positively to the objectives of the High Weald Management Plan.

7.15 A key challenge in the High Weald NL is to balance the growth and development of settlements and rural economies, with conserving and enhancing its natural beauty, including managing impacts on landscape and settlement character and features. Suburbanisation of landscape character, including through conversion of farmstead buildings, new roads and highways works, and inappropriate edge of settlement development, is eroding the distinctive local style in many places. However, small-scale, more sensitive development, can, if located in the right places, improve the sustainability

of settlements and clusters of settlements through the delivery of new services and facilities closer to where people live.

7.16 Policy LAN2 includes reference to three important documents produced by the High Weald National Landscape Unit, which assist in the consideration and determination of planning applications. The High Weald AONB Management Plan 2024-2029 covers a range of Local Authorities' functions and is a material consideration in the planning process, including assessing the impact of development proposals. The Management Plan sets out the core character components that comprise the natural beauty of the High Weald, and specific objectives and actions for each component. **Error! Reference source not found.**Figure 7.2 below identifies the Core Character Components of the High Weald's natural beauty, as detailed in the Management Plan.

Figure 7.2: Core Character Components of the High Weald's natural beauty[127]

Natural Systems (geology, soils, water, climate)	Settlement	Routeways	Woodland
Fieldscapes and Heath	Dark Night Skies	Aesthetic and Perceptual Qualities	Land-based Economy and Rural Living

7.17 The High Weald AONB Housing Design Guide and other supporting guidance supports the objectives of the Management Plan, providing succinct, practical advice to set clear design expectations for new housing development. It aims to ensure the achievement of higher quality, landscape-led design that reflects intrinsic High Weald character, embedded with a true sense of place, without stifling innovation and creativity. Importantly, the guide is not solely focused on the appearance or style of individual buildings, but rather about creating successful places in terms of layout, grain and massing of development. The Housing Design Guide is broadly based on 'Building for Life 12', explaining how design principles should be applied in the specific context and distinctive character of the High Weald AONB. The guide is therefore in line with the Live Well Locally policies, which reflect Building for a Healthy Life (BHL). BHL has updated Building for Life 12, retaining the underlying principles.

7.18 Part 4 of the policy specifically protects surviving evidence of the past. There is much evidence in the High Weald of, for example, ancient fortification; historic agricultural practice and the iron industry. This may take many forms, for example: earthworks, ponds, droveways and field patterns. Some features may constitute designated or non-

[127] High Weald AONB Management Plan 2024-2029

designated heritage assets, benefiting from local and national planning policy protection, but others may be less clearly defined. Development proposals which could affect such features will be carefully considered to ensure their retention and enhancement as character features of the High Weald and valuable evidence of the past.

Policy LAN3: Trees, Woodlands and Hedgerows

Status	Strategic
Priorities	Green to the Core, Live Well Locally
Strategic Objectives	3

1. Development proposals must, wherever possible, enhance and expand the district's tree, hedgerow and woodland resources. For all development proposals affecting or potentially affecting trees, hedgerows or woodland, the following criteria must be met:

Protection of existing trees, hedgerows and woodlands

a. Consideration must be given to existing trees, hedges and woodlands located on and adjacent to the site, with a view to retaining, protecting and enhancing them as far as possible as part of the development, aligned to the well-being benefits of green infrastructure and having regard to the support of Rother District Council for the Rights of Trees[128].

b. Where developments are likely to affect existing trees, the Council will require the submission of a proportionate level of information with the planning application to demonstrate that criterion (1) has been met. This could include a Tree Survey/Arboriculture Impact Assessment, Tree Protection Plan, and Method Statement in accordance with the latest British Standard (BS5837:2012).

c. Development which will result in damage to or loss of trees of amenity, historic, or high ecological value will be strongly resisted, unless:

i. The tree is demonstrated to be dead, dying, or pose an unacceptable risk to public safety; or

[128] Rother District Council meeting ,15th September 2025 (Agenda for Council on Monday 15th September 2025, 6.30 pm - Rother District Council)

ii. The tree is causing structural damage to nearby buildings or infrastructure that cannot be mitigated by any other means; or

iii. The public benefits of the development clearly and demonstrably outweigh the loss of the tree(s).

d. Trees with Tree Preservation Orders (TPOs) enjoy the highest level of protection. Impacts will only be accepted in exceptional circumstances where robustly justified and in line with legislation.[129]

e. Development which will result in the loss of a hedgerow will be strongly resisted unless this is justified and any necessary loss is demonstrated to be minimised as far as possible.

f. A minimum buffer of 15 metres will be required between the edge of development and designated ancient woodland or other priority habitat woodland. It must be demonstrated that any buffer is suitable to minimise impacts throughout the life of the proposal. Where assessment shows other adverse impacts are likely to extend beyond this distance during or following works, the proposal is likely to need a larger buffer zone. For ancient or veteran trees as well as any tree with a TPO, the buffer zone should be at least 15 times larger than the diameter of the tree at 1.5 metres height above ground, or at least 5 metres from the edge of the canopy, whichever is greater.

g. Development layouts must ensure that both retained and newly planted trees have sufficient space to grow and mature. Proposals must avoid positioning buildings, windows, or private amenity spaces where they will suffer obstruction or falling branches, which would result in future pressure to heavily prune or fell the trees.

h. Adequate working space and Root Protection Areas (RPA) must be safeguarded. Encroachment into the RPA will only be permitted where it is strictly necessary, fully justified, and agreed with the Council prior to work commencing using sensitive construction techniques.

i. Tree surgery work must be undertaken in accordance with the latest British Standard (BS3998:2010).

New tree planting

[129] The Town and Country Planning (Tree Preservation) (England) Regulations 2012 (as amended).

2. All new streets must be tree-lined in accordance with Policy LWL7 unless there are clear, justifiable, and compelling reasons why this would be inappropriate in specific streets.

3. Landscaping schemes, where necessary as part of a development, should take account of the local landscape character, take any opportunities to link to existing green infrastructure networks, and provide ecological enhancements in line with the Local Nature Recovery Strategy. Soft landscaping details should include new tree, hedge and woodland planting.

4. In selecting species for their planting scheme, applicants must:

    a. Select species suitable for the site conditions, soil type, intended functions, design effects and the surrounding structures and landscape;

    b. Prioritise native species and ensure species diversity to create a treescape resilient to pests, diseases, and climate change;

    c. Provide adequate below-ground soil volumes and planting pits to ensure long-term survival, while avoiding conflict with street lighting, highways infrastructure, underground utilities and access for maintenance;

    d. Consider the provision of shade to mitigate the effects of climate change.

Replacement trees and canopy cover

5. Where the loss of existing trees or hedgerows is unavoidably justified to facilitate development, adequate replacement provision will be required, which utilise local and native species appropriate to the character of the locality and the site. The Council will require the submission of a CAVAT assessment with any proposals to remove a tree of amenity, historic, or high ecological value. The lost canopy area must be adequately compensated in accordance with the findings of the CAVAT assessment. Replacement planting should aim to provide an equivalent or greater canopy cover at maturity, delivered on-site where possible, or via off-site contributions where on-site provision is unfeasible.

Management and maintenance

6. Proposals involving new tree, hedge and woodland planting must be accompanied by a management and maintenance plan (this may be achieved through a Biodiversity Gain Plan). The Council will secure planning conditions or obligations requiring the replacement of any trees or hedgerows that die, or fail to establish, or are removed within five years of planting.

Key evidence and/or guidance

- Rother Green and Blue Infrastructure Study (2026)
- East Sussex and Brighton & Hove Local Nature Recovery Strategy (2026)

7.19 This policy is in line with national planning policy, which is clear that policies should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees in developments, that appropriate measures are in place to secure the long-term maintenance of newly planted trees, that existing trees are retained wherever possible, and that irreplaceable habitats (such as ancient and veteran trees) are retained and protected.

7.20 Trees, woodlands and hedgerows form the backbone of the district's character, both in rural and urban areas. They provide social and environmental benefits to local communities, impacting positively on health and well-being, carbon sequestration, biodiversity, climate change adaptation and flood mitigation. The planting and retention of trees can significantly contribute to the successful integration of new development into the local environment and should be considered at the design stage of all development.

7.21 The Council has passed a Motion on the Rights of Trees[130]. This confirms support for the growing global movement for rights of nature as a framework for rethinking the relationship between human beings and the natural world. It confirms that protection should be prioritised for trees that can be considered as a "heritage and/or cultural asset". The Motion also confirms that the Council would support the introduction of legislation which would require those taking decisions affecting trees to have regard to the trees' rights, including to exist and grow, have their wellbeing protected, and not to be wilfully injured, damaged, polluted or killed. While the Motion is wider than planning policy, this policy provides a framework for implementing it as far as possible through planning decisions, specifically by ensuring that existing trees and hedges are retained and protected wherever possible and that development takes the opportunity to enhance and expand the district's tree, hedgerow and woodland resource.

Protection of existing trees, hedgerows and woodland

7.22 The preservation of existing trees is a material consideration in the planning process, whether they are subject to existing statutory protection or not. Any construction work in close proximity to trees should be undertaken using appropriate techniques in

[130] Rother District Council meeting ,15th September 2025 (Agenda for Council on Monday 15th September 2025, 6.30 pm - Rother District Council)

accordance with the relevant British Standard (such as by hand and not machine), in accordance with a methodology submitted to and agreed by the Council before work starts on site.

7.23 Proposals to remove a tree of amenity, historic, or high ecological value will require the submission of a CAVAT (Capital Asset Value for Amenity Trees) assessment. CAVAT is a method of tree valuation used as a strategic tool and aid to decision making for tree stock as a whole but also can be applicable to individual cases, where the value of a single tree needs to be expressed in monetary terms. The value of individual trees is important not only in amenity value but also in terms of biodiversity and contributing to wildlife connectivity across the district. The application of this system recognises that both individual and groups of trees can have significant value and any unavoidable loss will be sufficiently compensated with a tree of appropriate or equivalent size/ maturity.

Ancient woodland

7.24 Ancient woodland and ancient and veteran trees are recognised through the NPPF as irreplaceable habitats, that is, habitats with characteristic ecological features and processes which cannot successfully be created, and which generally support important and/or rare species populations or assemblages. To mitigate negative impacts, a buffer zone consisting of semi-natural habitat should be employed between the development and the ancient woodland or veteran tree. In some cases, larger buffers than 15 metres for ancient woodland will be required especially for major residential developments. Buffers will need to exclude residential gardens and site infrastructure including, but not limited to, roadways and active travel routes, play areas and SuDS infrastructure. Ancient woodland comprises the habitat as a whole, including the soil, plants and wildlife, and therefore the function of the buffer is not only for root protection of the trees. Further detailed guidance for applicants on ancient woodland and veteran trees is found in the Natural England and Forestry Commission Joint Standing Advice[131].

New tree planting

7.25 The planting of new trees will be required as part of landscaping schemes, to increase canopy cover within the district. In terms of species selection, this must consider factors including:

[131] https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions

- Site conditions: This can include, for example: amount of sun, exposure, soil, water source, pollution levels, and so on;

- Functions: The selection of suitable species should be informed by a clear understanding of what functions the new trees are to perform (e.g. air quality improvement, noise control, screening, biodiversity gains, flood risk mitigation, visual amenity, etc.)

- Diversity on balance: Applicants should also consider the impact of their species choice on diversity at the local and wider scale. Planting in large quantities of any single species is prone to a higher risk of pests and disease. Planting a diverse range of native species on the other hand will result in increased diversity of insects and subsequently birds, bats and other foraging species; however, planting too many species can increase management costs and may not achieve desirable visual impacts. The balance of these risks should be considered.

- Space requirements: Planting schemes should anticipate and avoid future issues that might prompt tree removal as they mature, such as proximity to party walls and underground utilities. They must also not obstruct footways ensuring clear horizontal openings and vertical clearance over footways for pedestrians. If a development proposal involves new planting in existing highways, the council, in liaison with the Highways Authority, may require a sub-surface utility location survey to ensure there is no conflict or constraints on existing utility apparatus or vice versa.

- Local landscape and native species: Planting schemes to enhance biodiversity should consider the types of tree species that are appropriate for local habitats/ biodiversity. Planting native species will have a greater benefit for biodiversity and are preferred. Native wildflowers in particular are an integral part of the area's ecosystems and should be included in landscaping schemes to also embed a sense of place and local character in a new development.

7.26 Multi-layered planting strategies will be appropriate across larger sites – to include trees, hedgerow boundaries, open spaces, gardens, and grassland verges, to allow for a range of vegetation heights and habitats across the development.

Policy LAN4: Light Pollution & Dark Skies

Status	Non-strategic
Priorities:	Live Well Locally, Green to the Core
Strategic Objectives	3, 9

1. In all areas of the district, development proposals must avoid unnecessary light pollution. The siting, layout and design of development must maintain and reinforce the sense of tranquillity of remote areas, especially locations within the High Weald National Landscape, through maintaining dark skies.

2. Development proposals with significant lighting requirements should be located on sites away from intrinsically dark rural skies, and away from wildlife sensitive areas such as ancient woodland.

3. Large areas of glazing in new building designs, especially wrap-around glazing and floor to ceiling windows, will not be permitted, especially in rural areas with intrinsically dark skies, unless it is demonstrated the proposal will have no adverse effects in terms of light pollution and affecting dark skies.

4. Development proposals within the High Weald National Landscape or its setting must have regard to the HWNL Unit's "Planning Technical Advice Note: Dark Skies in the High Weald".

5. Artificial lighting proposals must:

    a. Follow the Institute of Lighting Professionals (ILP) guidance on reducing obtrusive lighting and other relevant guidance to aid protecting dark skies, including ensuring that lighting designers use exterior light control environmental zone E1 to inform any proposed lighting in, or affecting the setting of, the High Weald National Landscape.

    b. Demonstrate that they have taken all opportunities to reduce light pollution.

    c. Seek to protect light-sensitive species, wildlife-rich sites and habitats such as ancient woodland from impacts from external lighting, and where lighting is needed, require minimised and ecologically informed lighting schemes regarding location, direction, lux levels, colour temperature and light fitting design.

d. Seek to reduce light pollution, including glare and sky glow, by ensuring that flood-lit facilities such as sports pitches and car parks are turned off when not in use through agreements and planning conditions.

e. Avoid unnecessary street lighting and ensure any street lighting required is kept to the minimum necessary and adheres to best practice in terms of location, illuminance and equipment design and light temperature, to avoid unnecessary skyglow and light spill. Proposals for new or improved streets, crossings, public spaces and walking, wheeling and cycling routes must assess the need for lighting having regard to their function, anticipated hours of use, highway and personal safety, inclusive access, natural surveillance, existing ambient lighting, biodiversity, landscape character and impact on dark skies.

Key evidence and/or guidance

- Reduction of Obtrusive Light Guidance, Institute of Lighting Professionals (2021)
- High Weald AONB Management Plan 2024-2029
- Planning Technical Advice Note: Dark Skies in the High Weald, High Weald AONB Unit (2024)

7.27 National planning policy requires development to be appropriate for its location, taking into account the likely effects of pollution (including light pollution) on health, living conditions and the natural environment. It requires planning policies and decisions to limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation. National Planning Practice Guidance contains advice on how to consider lighting within the planning system.

7.28 The policy applies to all areas of the district, recognising that light pollution can affect both urban and rural locations. Common sources of light pollution include sports and recreation venues, industrial and commercial areas and buildings, street and road lighting, railway stations and level railway crossings, and illuminated signage, and internal light spill from dwellings, particularly those with large areas of glazing. Light pollution and nuisance may also be caused at a domestic level from external security lighting and bulk head or 'welcome' lights at front and back doors. To avoid adverse effects, it is important that lighting design is an integral part of a development proposal, considered at an early stage in the design process.

7.29 Rother District has been found by CPRE to be the 24th darkest district out of 326 local authority areas nationally[132]. A number of parishes have been accepted as, or are in the process of applying to become, part of the International Dark Sky community. Skyglow reduces views of celestial bodies such as the Milky Way and Orion, leading to a loss of public connection and enjoyment of the night skies. The policy intends to not only mitigate the impact of light pollution on the visibility of the night sky but the harmful impact on human health, wildlife and biodiversity.

7.30 The potential impact of lighting on dark skies is a particular issue in the High Weald National Landscape, which has some of the darkest skies with the least skyglow in the southeast, recognised by the International Dark Sky Association as being worthy of conservation. The HWNL Management Plan highlights 'Dark Skies' as being one of the eight defining components of the natural beauty of the High Weald and sets out two relevant objectives: one around preserving the dark skies of the HWNL by minimising light pollution, and the other requiring the protection of wildlife and habitats from light pollution across the area. The HWNL Unit has also published a High Weald Dark Skies Planning Advice Note[133] which should be taken into account in development proposals in the area.

7.31 Light pollution affects a wide range of species including invertebrates, mammals, birds and amphibians, impacting on migration, feeding, breeding and circadian rhythms. Bats are particularly susceptible, and schemes should be designed in accordance with guidance published by the Institute of Lighting Professionals and the Bat Conservation Trust[134]. More generally, The Institute of Lighting Professionals has published a guide to the issue of avoiding light pollution, 'The Reduction of Obtrusive Light'[135], which sets out that there are two ways of avoiding light pollution in developments, firstly at the design stage by designing out features that have the capacity to contribute to light pollution and then ensuring that any required lighting follows the 'right light, right place' maxim.

7.32 Many rural areas of Rother have little or no street-lighting, and new development proposals will be required to respect this to preserve rural character and protect dark skies. However, in some cases lighting will be necessary to enable safe and inclusive active

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[132] CPRE's light pollution and dark skies map (England's Light Pollution and Dark Skies Map)
[133] Planning Technical Advice Note: Dark Skies in the High Weald (2024) (highweald.org/document-library/legislation-and-planning/high-weald-national-landscape-dark-skies-planning-advice-note/?layout=default)
[134] Guidance Note 08/23: Bats and Artificial Lighting at Night (GN08 Bats and Artificial Lighting)
[135] GN01 For the reduction of obtrusive light 2021

travel, or for highway safety. Where street lighting is required, it must be the minimum necessary to fulfil its safety and accessibility purpose and must:

a. Illuminate both the route and its users consistently, avoiding dark spots and abrupt changes in illumination;

b. Be directed and shielded to minimise glare, skyglow and light spill;

c. Use an appropriate colour temperature and minimise blue-light content;

d. Avoid or minimise effects on protected species, habitats and ecological corridors;

e. Use dimming, part-night, presence-sensitive or other adaptive controls where appropriate;

f. Minimise the number and visual prominence of columns and associated equipment; and

g. Follow relevant standards and current best practice.

Water Management, Flood Risk, Ground Conditions & Coastal Change

Policy ENV1: Flood Risk Management

Status	Strategic
Priorities	Green to the Core
Strategic Objectives	1, 3, 4, 8, 9

1. Flood risk from all sources will be reduced, managed and where necessary, appropriately mitigated by:

    a. Locating new development to minimise the risk of flooding in accordance with the Sequential and Exception tests set out in national planning policy;

    b. Locating and designing new development to account for increased flood risks from all sources, making an allowance for climate change, as identified in the Rother Strategic Flood Risk Assessment (SFRA) 2026, and subsequent updates;

    c. Mitigating any residual flood risk through avoidance, design and implementation of SuDS principles in accordance with Policy ENV3 (Sustainable Surface Water Drainage), including Working with Natural Processes (WwNP) or Natural Flood Management (NFM), unless it can be demonstrated that this is not feasible;

    d. Ensuring that new development does not materially increase the flood risk to other areas and incorporates appropriate surface water drainage measures to minimise its own risk of flooding, ensuring existing flood flow paths are taken into consideration;

    e. Ensuring that new development does not compromise existing water management or flood infrastructure or the drainage schemes of other sites which already have planning permission;

    f. Ensuring that any proposed flood prevention measures have full regard to sensitive areas designated for nature conservation and biodiversity.

Key evidence and/or guidance

- Rother Strategic Flood Risk Assessment Level 1 and Level 2

7.33 The purpose of this policy is to ensure flood risk is evaluated in development proposals and to require the appropriate management of surface water disposal to reduce flood risk across the district. The requirements for sustainable surface water drainage (SuDS) are further developed in Policy ENV3 (Sustainable Surface Water Drainage) below.

7.34 Different forms of flood risk are present across Rother District and arise from a range of sources, with the principal risks being fluvial flooding in the upper catchment, tidal flooding along the coast, and a combination of fluvial and tidal flooding in the lower catchment. Significant flood events occurred in 2000 and 2013/14, mainly caused by the overtopping of watercourses following prolonged rainfall and tidal storm surges. The River Rother, River Brede and River Tillingham are the main rivers contributing to flood risk, with lower reaches affected by tidal locking, alongside Combe Haven, East Stream and Picknell Green Stream. Key settlements at risk of fluvial flooding include Robertsbridge, Salehurst, Etchingham and Rye, while coastal communities such as Rye Harbour and Camber have experienced tidal flooding in the past due to the overtopping of defences, which have, in recent years, been improved.

7.35 Surface water flood risk is concentrated along natural flow paths, watercourses, roads and low-lying areas where water can pond, with additional pressures in coastal locations from high groundwater levels and tide-locking of drainage infrastructure. Although most of the district has a low risk of groundwater flooding, higher risks are present in the marshland areas around Rye Harbour and Camber, with localised perched aquifers also causing flooding issues. Sewer flooding is a notable concern particularly affecting Bexhill-on-Sea, Battle, Rye, Robertsbridge and Pett Level, where there is a history of flooding from the Marsham Sewer in periods of wet weather, caused by run-off into the sewer from the Marsham catchment. Reservoir flooding also presents a residual risk from reservoirs within and beyond the district, although no reservoir breach incidents have been recorded in Rother.

7.36 All new development should be located to minimise flood risk. The national policy approach is to steer development towards areas of low flood risk and avoid inappropriate development in areas at higher risk of flooding. Where development is by exception necessary in such areas, development should be made safe for its lifetime, without increasing flood risk elsewhere and where possible, reduce overall flood risk. There is an increased risk of flooding resulting from climate change due to an increased occurrence of storms in winter. Additionally, climate change may lead to drier summers, resulting in reduced river flows.

7.37 The plan is supported by a Strategic Flood Risk Assessment (SFRA). The study was prepared in cooperation with the Environment Agency and the Lead Local Flood Authority and Internal Drainage Boards. It provides a comprehensive and robust appraisal of the extent and nature of flood risk from all sources, now and in the future, taking into account the future effects of climate change and its implications for land use planning.

7.38 Working with Natural Processes (WwNP), also referred to as Natural Flood Management (NFM), involves protecting, restoring, or mirroring the natural functions of river catchments, floodplains, and coasts to reduce flood risk. By slowing the flow of water and increasing temporary storage, these nature-based solutions help lower flood peaks and therefore protect communities. In addition, the nature-based approach delivers other benefits across social (flood risk reduction, water resources, air quality), environmental (biodiversity, soil, climate regulation, water quality) and cultural (amenity value) categories. The implementation of nature-based solutions to reduce flooding and improve water quality, as per the policy requirement, will enable the district to become more resilient to climate change.

7.39 Policies LWL5 (Well-designed & Distinctive Places) and LWL6 (Built Form) set out how existing site features, natural drainage characteristics and topography should inform the design and layout of development. Natural drainage routes, watercourses, ponds, low-lying areas and other relevant site features can help structure development and should be considered as part of an integrated flood risk, landscape and placemaking response.

7.40 The Environment Agency is responsible for flood risk management from Main Rivers[136] and the coast. ESCC is the Lead Local Flood Authority (LLFA) for the county and manages local flood risk focussing on surface water, groundwater and Ordinary Watercourses[137]. The Internal Drainage Boards have an important role in ensuring water is managed appropriately within their catchments[138]. The policy requires that new development does not compromise existing water management or flood infrastructure, this may involve the provision of adequate protection zones and undeveloped buffers. In the area of the Pevensey & Cuckmere Water Level Management Board there are relevant

[136] A Main River is a larger river or stream, designated by the Environment Agency.
[137] An Ordinary Watercourse means a watercourse that does not form part of a Main River (Flood and Water Management Act 2010).
[138] In Rother, the IDBs are Pevensey and Cuckmere Water Level Management Board (PCWLMB) and Romney Marshes Internal Drainage Board (RMIDB).

byelaws; specifically, there is a requirement for a nine-metre buffer between its water management/flood infrastructure and any development or other obstruction[139].

7.41 There is a particular need to ensure that development (including any flood mitigation measures) within or near sites that are protected for their ecological importance, including the Pevensey Levels SAC and Ramsar site and the Dungeness Complex of Habitats Sites, is appropriate. This is because poor quality water, or a change in the amount of water, draining into these sites would impact on the environment and ecology. Specific attention is given to the Pevensey Levels hydrological catchment, where more stages of treatment for surface water are required through Policy ENV3, three at a minimum, to mitigate impacts on water quality and quantity.

[139] Confirmed Byelaws for Pevensey & Cuckmere Water Level Management Board Byelaws - Water Management Alliance: Water Management Alliance

Policy ENV2: Protection of Water Quality & the Water Environment

Status	Strategic
Priorities	Green to the Core, Live Well Locally
Strategic Objectives	1, 3

1. The water environment will be protected and enhanced in line with the objectives of the Water Framework Directive. This will be achieved by:

    a. Requiring development proposals which could affect the water environment to identify and incorporate opportunities to support the objectives of the South East River Basin District (RBD) River Basin Management Plan and the East Sussex and Brighton & Hove Local Nature Recovery Strategy in relation to water quality, aligned to the well-being benefits of blue infrastructure;

    b. Only permitting development in Groundwater Source Protection Zones (SPZs) where it can be demonstrated that there will be no adverse impact on the quality and resource of the groundwater;

    c. Ensuring the provision of adequate protection zones and undeveloped buffers to watercourses, demonstrating that the buffer is suitable to retain the natural function of the watercourse and its biodiversity;

    d. Ensuring that appropriate infrastructure for sewerage is available to meet the needs of proposed development, in accordance with Policy ENV4 (Foul Water Drainage);

    e. Ensuring that development proposals take opportunities to naturalise watercourse channels, improve biodiversity and ecological connections of watercourses where possible, incorporated through green and blue infrastructure;

    f. Wherever possible, avoiding negative impacts from diffuse agricultural and urban pollution;

    g. Wherever possible, avoiding altering natural flow of waterways;

h. Having regard to the support of Rother District Council for the Rights of Rivers[140] in planning decisions.
Key evidence and/or guidance • Rother Strategic Flood Risk Assessment Level 1 and Level 2 • South East River Basin District River Basin Management Plan (2022) • East Sussex and Brighton & Hove Local Nature Recovery Strategy (2026)

7.42 Impacts on water quality will increase with climate change. Resulting from, for example, an increased occurrence of storm overflows from wastewater treatment works during storm events in wet winters, and reduced river flows leading to a reduced dilution of wastewater discharges during dry summers. Recognising the vital role that rivers and freshwater systems play in sustaining life, culture and ecosystems, the Council has passed a Motion on the Rights of Rivers[141]. This confirms the Council's support for the growing global movement for rights for nature in general and for rivers in particular, as a framework for rethinking the relationship between human beings and the natural world. It confirms that the Council would support the introduction into law of various rights for rivers, including their right to flow, be free from pollution and to support biodiversity. While the Motion is wider than planning policy, Policy ENV2 provides a framework for ensuring the protection and improvement of water quality and the water environment.

7.43 The EU Water Framework Directive (WFD)[142] seeks to establish an integrated approach to the protection and sustainable use of the water environment, requiring a holistic approach to managing waters, looking at the wider ecosystem and considering the movement of water through the hydrological cycle. Incorporating adequate protection zones, and naturalising watercourse management through green and blue infrastructure, will help ensure the efficient use of land and encapsulate the holistic approach to managing water within an area. Policy LWL5 (Well-designed & Distinctive Places) requires existing watercourses, ponds and natural drainage routes to be retained and integrated as anchor features within the layout and design, while Policy LWL6 (Built Form) requires landscape, levels and drainage characteristics to inform site capacity and layout. Protection zones, buffers and opportunities for watercourse naturalisation should

[140] Rother District Council meeting ,15th September 2025 (Agenda for Council on Monday 15th September 2025, 6.30 pm - Rother District Council)
[141] Rother District Council meeting ,15th September 2025 (Agenda for Council on Monday 15th September 2025, 6.30 pm - Rother District Council)
[142] Retained in domestic law through The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (WER) following the UK's exit from the EU

therefore be considered as integral elements of the site's green and blue infrastructure and wider design concept.

7.44 The provision of adequate buffer zones is important in preserving watercourse corridors, flood flow conveyance and future watercourse maintenance and improvement. It also enables the avoidance of disturbance to ecology and the structural integrity of riverbank. Proposals should therefore ensure no built development is located within 8 metres from the edge of the bank of any Ordinary Watercourse or Main River within the district and ensure a minimum distance of 9 metres from the edge of any drainage or flood risk management infrastructure within the Pevensey and Cuckmere Water Level Management Board district in accordance with local byelaws.

7.45 The South East River Basin District (RBD) Management Plan (updated 2022) identifies water management issues in the south-east region and sets legally binding environmental objectives aiming to improve water quality. Locally, the two relevant management catchments are the Cuckmere and Pevensey Levels, and the Rother. The East Sussex and Brighton & Hove Local Nature Recovery Strategy (LNRS) includes a number of priorities relating to rivers, streams and aquifers and wetlands and standing water bodies, including supporting their health, recovery, biodiversity and natural functions. Additionally, South East Water has a Water Resources Management Plan and Southern Water has a Drainage and Wastewater Management Plan as well as a Water Resources Management Plan.

7.46 The surface water sources within Rother comprise three reservoirs at Bewl Water, Darwell Reservoir and Powdermill Reservoir. Other Local Plan policies relate to the recreational use of Bewl Water, and other water-based recreation.

7.47 Areas of aquifer vulnerability are defined by the Environment Agency as source protection zones (SPZs). These zones identify areas around a groundwater source which need protecting from potential pollutants. Within Rother, SPZs primarily affect the north and central-western areas of the plan area. The Environment Agency and water authority should be consulted at the earliest opportunity on any application for new development in SP Zones 1 and 1c. In most cases it will be possible to protect groundwater and public water supply through appropriate planning conditions. However, it may be necessary to exclude development from areas of extreme vulnerability.

7.48 Watercourses can be subject to pollution from multiple sources including sewage, agriculture, nitrogen oxide (NOx) from traffic exhaust fumes and plastic particles from tyre road wear. Natural England has defined specific nutrient neutrality areas of concern

across the country, which does not include Rother. Nevertheless, it is important that development does not add to existing nutrient burdens or other water pollution within a drainage catchment area and does not negatively impact environmentally designated sites. Therefore, developments which have the potential to result in pollutants and runoff will be required to consider and mitigate for such impacts, with a view to improving the flow and water quality of rivers in order to restore their biodiversity value. Policy ENV3 goes further on Sustainable Surface Water Drainage.

Policy ENV3: Sustainable Surface Water Drainage

Status	Non-strategic
Priorities	Green to the Core
Strategic Objectives	1, 3

1. For all development proposals which could affect drainage on or around the development site, developers must demonstrate that sustainable drainage (SuDS) is an integral part of the design of the proposed development from the outset.

2. Development proposals must be accompanied by details of the proposed sustainable drainage scheme and a Drainage Strategy, based on evidence of an assessment of site and wider catchment conditions and, reflecting the drainage hierarchy, best practice and relevant local and national guidance[143]. The Drainage Strategy must demonstrate how surface water management has informed the site layout, levels, landscaping, and green and blue infrastructure and how the four pillars of SuDS — water quantity, water quality, biodiversity and amenity — have been addressed.

3. Development proposals will be required to demonstrate that development:

    a. On greenfield sites, does not increase greenfield run off rates or the vulnerability of the site or the wider catchment, to flooding from surface water run-off from existing or predicted water flows;

    b. On brownfield sites, does not increase the run-off more than the rate prior to any new development, as agreed in conjunction with the Lead Local Flood Authority (LLFA);

    c. Has no adverse effects on the water environment of the Pevensey Levels SAC/Ramsar and the Dungeness, Romney Marsh and Rye Bay SPA/ Ramsar.

    d. Wherever possible, has a positive impact on the risk of surface water flooding on the site and in the surrounding area adjacent to the development;

    e. Mitigates the potential impact of infiltration upon groundwater Source Protection Zones and/or Critical Drainage Catchments;

[143] e.g. Lead Local Flood Authority (LLFA) Guidance v4 March 2019 and 2021 update, RDC Strategic Flood Risk Assessment 2026, Planning Practice Guidance and National Standards for Sustainable Drainage Systems

f. Does not include infiltration drainage SuDs features that drain into land affected by contamination, Made Ground[144], or within a coastal zone within 50 metres of the cliff face at Fairlight Cove, as shown on the Policies Map;

g. Ensures all surface water will pass through at least two treatment stages. For development in the hydrological catchment of the Pevensey Levels, a minimum of three stages of treatment will be required;

h. Safely accommodates exceedance flows and surface water flow routes within the development site, without increasing flood risk elsewhere, and integrates them with the site layout, landscaping and green and blue infrastructure where appropriate;

i. Secures appropriate arrangements for the management and maintenance of sustainable drainage infrastructure for the lifetime of the development.

Key evidence and/or guidance

- Rother Strategic Flood Risk Assessment Level 1 and Level 2
- South East River Basin District River Basin Management Plan (2022)
- National Standards for Sustainable Drainage Systems (2025)

7.49 Sustainable Urban Drainage Systems (SuDS) should be utilised proportionately to the nature and scale of development and its likely impact. The degree to which any solution may be considered appropriate will depend on its impacts on water quality and wider land drainage interests and strategies to address water disposal management and flood risk. The type of system that would be appropriate will vary from small-scale interventions to larger integrated schemes in major developments.

7.50 When considering the scale and design of SuDS needed, the system proposed will need to be able to cope with the levels of runoff arising as a result of the development. This is to ensure that the risk of flooding as a result of a development does not grow and adversely impact the surrounding area.

7.51 SuDS should be multi-functional in terms of addressing other Local Plan policy areas, such as helping to improve biodiversity and habitat creation, or creating recreation and amenity spaces. SuDS must be considered from the outset in development proposals to ensure efficient and appropriate use of space and the provision of multi-functional

[144] Made Ground is an area where the pre-existing (natural or artificial) land surface is raised by artificial deposits (British Geological Survey).

benefits, including, where practicable, benefits for water quantity, water quality, biodiversity and amenity. Phased development will be required to demonstrate that the SuDS being proposed are able to meet the needs of each phase as it is built out.

7.52 SuDS have various stages of treatment. Guidance from the LLFA states that rainfall should pass through at least two stages of treatment to ensure water quality is improved before being infiltrated or otherwise discharged off site. At least three stages are required within the Pevensey Levels Hydrological Catchment shown in Figure 7.3 below, however, to ensure the protection of this sensitive site. Relevant development within close proximity to the Pevensey Levels and also the Dungeness Complex of Sites will also be subject to Habitats Regulations Assessment under the relevant Regulations.

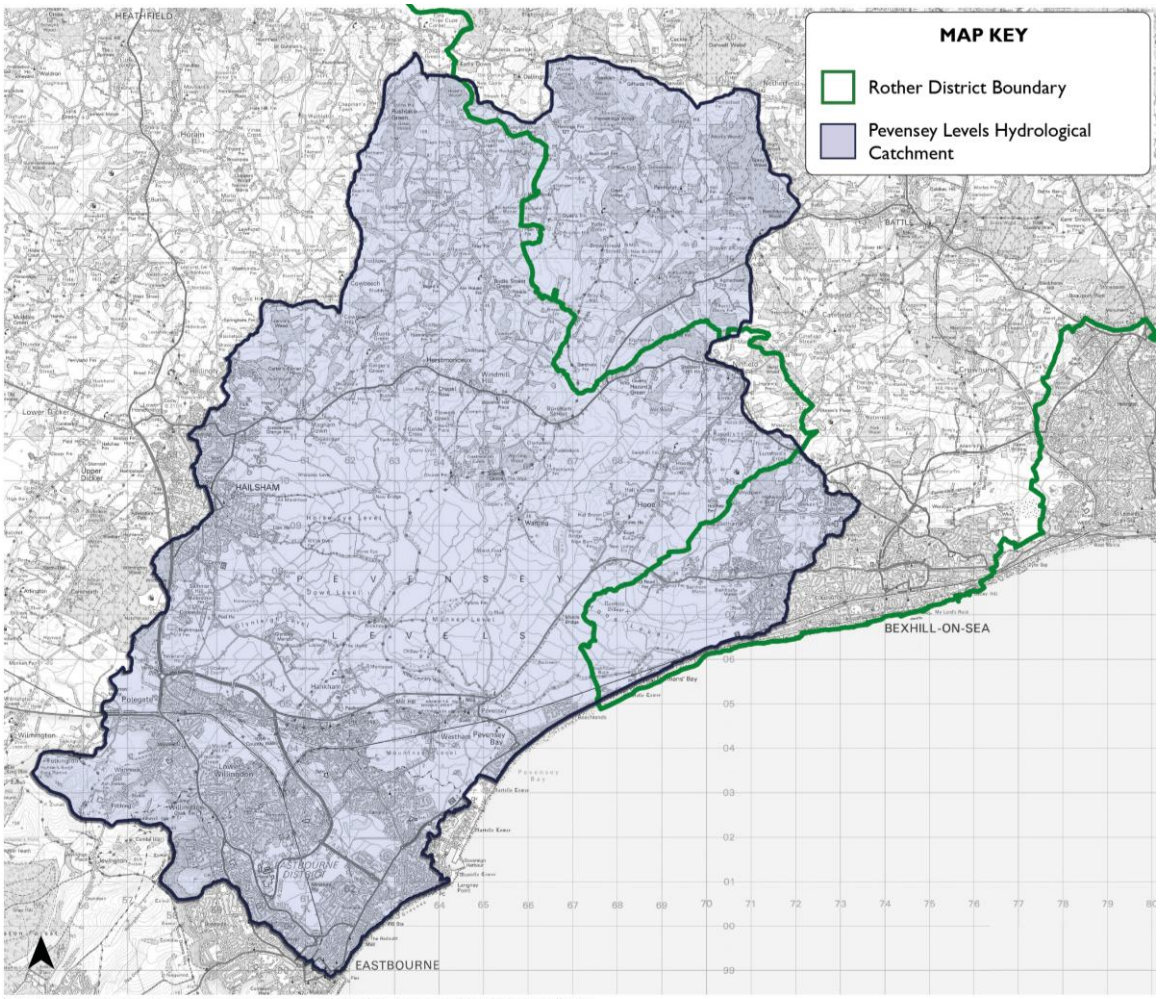
7.53 Applicants should submit sufficient information to enable proper consideration of drainage proposals. For major schemes, seeking pre-application advice from the LLFA is strongly recommended. For minor development, the LLFA's 'SuDS Decision Support Tool for Small Scale Development' should be used. In all developments, attenuation measures such as green roofs, rainwater harvesting and permeable paving, should be incorporated to help to reduce runoff where appropriate. For major development, the Drainage Strategy must incorporate the SuDS Concept Design required by Policy LWL6. The Landscape, Levels and Drainage Strategy required by Policy LWL6 and the Drainage Strategy required by this policy must be prepared in a coordinated manner and may form complementary parts of the same submission.

7.54 Proposed SuDs features should not drain into land affected by contamination or Made Ground to prevent the ingress of pollutants into the underlying soils and groundwater. In locations where Made Ground or land affected by contamination may be present (i.e. historic landfills), the Environment Agency should be consulted to ensure that no proposed drainage will cause pollution to controlled waters. In addition, at Fairlight Cove, issues of groundwater affect land stability and cliff erosion, meaning soakaways must be restricted near the cliff face.

7.55 Proposals must explain how flood risk impacts will be managed during the construction phase and will need to demonstrate that maintenance measures will be in place for the lifetime of the development.[145] This may be secured by a legal agreement.

[145] Residential development is defined as having a lifetime of at least 100 years. The starting assumption for non-residential development is 75 years.

Figure 7.3: Pevensey Levels Hydrological Catchment Area



Policy ENV4: Foul Water Drainage

Status	Non-strategic
Priorities	Green to the Core
Strategic Objectives	1, 3

1. The provision of appropriate infrastructure for sewerage will be required to meet the needs of development, in accordance with Policy INF1 (Strategic Infrastructure Requirements).

2. Development proposals must:

    a. Follow the drainage hierarchy;

    b. Ensure that foul and surface water flows are separated, and that the design of the wastewater disposal system will be safe and effective over the lifetime of the development;

c. Ensure that any development proposing to discharge to a package treatment plant is compliant with the Environment Agency's General Binding Rules.

3. Within the catchment areas for the Dungeness, Romney Marsh and Rye Bay SPA/ Ramsar site and the Pevensey Levels SAC/Ramsar site, it must be demonstrated:

   a. Via agreement by the wastewater provider, that modelling demonstrates that there is sufficient capacity within the relevant wastewater treatment works for the proposed development to be accommodated without a negative effect on the receiving environment; or

   b. That the development can be delivered without a negative water quality effect on the Habitats Sites in accordance with the Habitats Regulations. Details of the means by which any necessary protection measures will be secured for the lifetime of the development will be required as part of any application.

Key evidence and/or guidance

- Rother Habitats Regulations Assessment (2026)
- Building Regulations 2010 Approved Document H (Drainage and waste disposal)

7.56 The Government's planning advice on the use of non-mains foul drainage in England is contained within the Planning Practice Guidance (PPG). Both the PPG and the Building Regulations 2010 Approved Document H set out a presumption in favour of connection to the public foul sewer wherever it is reasonable to do so.

7.57 The drainage hierarchy is a sequential approach to the disposal of foul water. This means that development proposals must first consider connection to the public foul sewer network where capacity is available, before considering alternative options where connection is not feasible. Alternative methods are assessed in order of preference, typically including package treatment plants and, only as a last resort, private septic tanks. The hierarchy helps ensure that foul water is managed in a way that protects public health, safeguards water quality and sensitive environmental habitats, minimises pollution risks, and promotes the efficient use of wastewater infrastructure.

7.58 Before a proposal to use non-mains foul drainage is considered, an applicant must demonstrate to the Council's satisfaction that it is not practicable to connect to the

public sewer in accordance with Environment Agency guidance on discharge of surface water and groundwater. The cost of the connection will not necessarily be the determining factor, as connection to the sewer may still be reasonable where it is more costly than the installation of a private foul sewerage system because of the environmental benefits of connection to the mains foul sewer. Similarly, capacity or other operating problems with the public sewer, are not acceptable reasons for non-connection where this is otherwise reasonable. Where there is a lack of capacity within the public sewerage system, applicants should establish with the Water Authority how they can connect their development to the existing network without worsening existing issues.

7.59 Adopted treatment plants (a sewage treatment plant that is adopted by the local water authority) would be preferable for any site that is within the catchment of the Pevensey Levels. High nutrient loading will exacerbate the problem with the non-native invasive species, pennywort, which is a challenge to manage and is spreading on the Pevensey Levels.

7.60 Where it is proposed to connect to the mains foul sewer, the applicant must identify the closest potential point of connection, in consultation with the Water Authority.

7.61 Where a connection to the public sewer is not reasonable, the hierarchy of non-mains alternative solutions set out in Section H1 of Building Regulations Part H[146] must be followed. This occurs most frequently in the rural areas of the district. It is unlikely that any major developments would be permitted to discharge via a non-mains drainage system, given the potential risk to the environment. The Council will apply the Environment Agency's advice for local authorities on non-mains drainage from non-major development in the decision-making process. Applicants should provide evidence that the Environment Agency's General Binding Rules has been considered, and where compliance is not possible, that application for the relevant permits has been submitted.

Policy ENV5: Ground Conditions

Status:	Non-strategic
Priorities	Green to the Core
Strategic Objectives	1, 3
1. Development proposals that comprise or include land that is known or suspected to be affected by land contamination or land instability	

[146] The Building Regulations 2010: Drainage and waste disposal

(including coastal margins) must establish the full nature and extent of the ground condition issues through the submission of a ground conditions report prepared by a suitably qualified professional. This must include consideration of the effects on sensitive receptors both on-site and in the wider area, and potential impacts of climate change.

2. Where a scheme of remedial work is required to make the ground conditions safe for the proposed use, a Remediation Strategy must be prepared and implemented by the developer which demonstrates that the proposed development;

    a. Will not exacerbate any ground condition issues on site or in the nearby surrounding area;

    b. Can tolerate the ground conditions for the lifetime of the use without causing adverse impacts;

    c. Can appropriately manage surface water run-off within the site in accordance with Policy ENV3.

3. Relevant monitoring, management and/ or maintenance of the measures identified in the Remediation Strategy will be secured as part of the development.

4. Where insufficient information is provided to determine the effect of development on ground conditions, or the relevant reports indicate that there will be an unacceptable adverse impact which cannot be adequately prevented, avoided, and/or mitigated through appropriate remedial measures, planning permission will be refused.

Key evidence and/or guidance

- National Planning Practice Guidance

7.62 Challenging ground conditions can be caused by many factors. This policy relates to ground condition issues caused by both instability, and land contamination.

Land Instability

7.63 Rother's coastline is vulnerable due to erosion and more extreme events linked with climate change, in addition, local ground conditions, flood events and former land filling or mining can also cause stability issues.

7.64 The NPPF requires planning authorities to prevent development from contributing to land instability or being adversely affected by it. At the same time, it recognises that

carefully planned development can provide opportunities to remediate unstable land and reduce existing risks through appropriate mitigation and restoration measures. In addition, the NPPF requires developers and landowners to ensure that development is safe and fit for purpose. Proposals should also consider the likely effects of climate change. Comprehensive site investigations should be undertaken prior to submission to provide an evidence base for decision-making.

7.65 As a starting point, development should avoid unstable land through the design and layout of the proposal. It is recognised that this may not always be possible and as such, development on unstable land should be designed to be safe.

7.66 Developers may be required to demonstrate that they have investigated risks and where there is likelihood of instability, a full land instability risk assessment report must be submitted with a planning application. This must be undertaken by a competent person to demonstrate the degree of instability, appropriate measures to mitigate those risks, an implementation plan, and future monitoring plan. Further information on the steps developers should take are contained within the Planning Practice Guidance on Land Stability.[147]

Land Contamination

7.67 The planning system plays a complimentary role with dealing with land contamination alongside a range of other systems and legislative requirements. This means that planning policies should be contributing to an enhanced environment and safe for the new use. National planning policy and guidance expand further on the considerations required when dealing with land contamination and remediation. Responsibility for securing a safe development rests with the developer and/or landowner. However, the Council should be satisfied that a proposed development will be appropriate for its location and not pose an unacceptable risk.

7.68 Previously developed land (or brownfield land) has the potential to be impacted by historical contamination, and this should be fully investigated at an early stage of any development proposal. Developments involving ground works on or in the vicinity of sites where contamination is known or suspected will also require investigation. In Rother, this can commonly include, but not be limited to, proposals involving the conversion of former agricultural buildings. Any investigation and assessments must be

[147] Land stability - GOV.UK

carried out by a suitable qualified person. This will likely be a person accredited by the National Quality Mark Scheme (NQMS) for Land Contamination Management.

Policy ENV6: Rother Coastal Change Management Area

Policy Status	Strategic
Overall Priorities	Green to the Core, Live Well Locally, Thriving Local Economy
Strategic Objectives	1, 3

1. Within the Rother Coastal Change Management Area (CCMA), as defined on the Policies Map, proposals for new permanent residential development, including those involving the conversion or replacement of existing buildings, will not be permitted.

2. Other forms of development within the CCMA will only be considered acceptable if a Coastal Vulnerability Assessment (CVA), which is proportionate to the scale and type of development, is submitted with the application and demonstrates that:

    a. The proposal comprises essential infrastructure including coastal protection schemes; or

    b. The proposal comprises commercial, tourism/ leisure or community development which provides wider sustainability benefits; and

    c. The works are consistent with the relevant Shoreline Management Plan (SMP) and that there will be no adverse impact on the local environment, natural coastal processes or accelerate the rate of coastal change elsewhere;

    d. The character of the coast and any relevant designations would not be compromised;

    e. It will not result in an increased risk to life or property over its planned lifetime[148];

    f. The proposal does not hinder the creation and maintenance of the King Charles III English Coast Path, National Cycle Network, or any

[148] Residential development is defined as having a lifetime of at least 100 years. The starting assumption for non-residential development is 75 years.

other public rights of way adjacent to, or that benefit from, views or access to the coast in accordance with the Marine and Coastal Access Act 2009.

3. Development proposals permitted within the CCMA may be subject to a time-limited permission and restoration conditions to ensure alignment with long-term costal change.

4. Applications for the relocation of development to a new location outside of the CCMA will be supported provided:

    a. The existing development is lawful;

    b. The existing development is demonstrated to be at risk of loss within the next 20 years (short term);

    c. The type and scale of development and its proposed location is consistent with other policies within this plan; and

    d. A clear plan for restoration of the original site to a natural or semi-natural condition, including the removal of built structures, materials and services, is submitted with the application and agreed with the Environment Agency.

Key evidence and/or guidance

- Rother Strategic Flood Risk Assessment Level 1
- South Inshore and Offshore Marine Plan (2018)
- South Foreland to Beachy Head SMP11

7.69 The Rother coastline shares coastal boundaries with Hastings Borough, Wealden District (to the west) and Folkestone & Hythe District (to the east). Whilst this Local Plan addresses the section of coastline within Rother District, coastal processes operate across administrative boundaries and can have cross-boundary implications. Accordingly, the effective management of coastal change requires ongoing cooperation and a coordinated approach between adjoining local planning authorities and other stakeholders.

7.70 Rother's coastline presents two main coastal typologies; low-lying areas, and cliff top areas. Both are comprised of a variety of soft silts, clay, sand, gravel and other material that is susceptible to erosion and significant movement over time. The natural process of erosion and movement of material has taken place over thousands of years and will continue to shape the coastline. Various schemes of soft and hard defences including

groynes, beach replenishment and sea walls have been used to protect settlements along the coast such as Bexhill, Fairlight, Pett Level, Winchelsea Beach, Rye Harbour and Camber.

7.71 National planning policy and guidance state that local plans should reduce the risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast. It further states that Plans should identify Coastal Change Management Areas (CCMA) which cover areas likely to be affected by physical changes to the coast over both short and long-term time periods.

7.72 Shoreline Management Plans (SMP) set out the strategic high-level policies for the coast, and determine appropriate, strategic policies for coastal management that balance the many, and often competing, aspirations of stakeholders with proper regard for economic and environmental sustainability. The SMP divides the coastline into individually numbered, discrete lengths, which are accordingly designated management strategies in the short (0-20 years), medium (20-50 years) and long term (50-100 years). These strategies are comprised of 'Hold/advance the line', 'Managed realignment' and 'No active intervention'. The overarching aim of the SMP is to move towards a more sustainable naturally functioning coast. The National Flood and Coastal Erosion Risk Management Strategy for England (NFCERMS) compliments the SMPs and sets out a comprehensive long-term vision and strategic framework for managing flood and coastal erosion risks across England. NFCERMS has a clear vision, "A nation ready for, and resilient to, flooding and coastal change – today, tomorrow and to the year 2100" and outlines long-term goals supported by evidence on future flood risks and investment requirements.

7.73 The Local Plan designates a CCMA along the entire Rother coastline, incorporating SMP policy units 4C14 to 4C22 and 4C26 to 4C27, as identified in Figure 7.4 and Figure 7.5. Whilst parts of units 4C14 and 4C27 lie within the administrative areas of Folkestone & Hythe District Council and Wealden District Council respectively, a consistent cross-boundary approach has been adopted where possible. This reflects the approach taken by neighbouring coastal authorities and accords with the recommendations of the Rother Strategic Flood Risk Assessment (2026), which is informed by the SMP, National Coastal Erosion Risk Mapping 2 (NCERM2), and supporting evidence on coastal change and erosion risk[149].

[149] National Coastal Erosion Risk Mapping 2 (NCERM2; 2024)

7.74 All planning applications for development within the CCMA must be accompanied by a Coastal Vulnerability Assessment (CVA) and account for the potential risk of erosion upon the development. The requirements of a CVA are set out in PPG. The assessment should be appropriate to the degree of risk and the scale, nature and location of the development and the policy will be applied proportionately according to the level of risk to its objectives. The SMP evidence currently provides the best available information on the anticipated impacts of future coastal erosion and should be used to inform assessments of properties at risk. Exceptions may apply where a CVA submitted by the applicant demonstrates, through robust and up-to-date site-specific evidence, that an alternative assessment is justified. It should also be noted that the relevant SMPs and associated erosion mapping are expected to be updated over the course of the Local Plan period.

7.75 The CVA should demonstrate that the development provides wider sustainability benefits that outweigh the predicted coastal change impact; will be safe through its planned lifetime, without increasing risk to life or property, or requiring new or improved coastal defences; does not affect the natural balance and stability of the coastline or exacerbate the rate of change (beyond the policies of the relevant SMP) and should consider and identify measures for managing the development at the end of its planned life.

7.76 The Council acknowledges that coastal communities may have been adversely affected by coastal change, resulting in reduced property values and investment. There is therefore a recognised need for an approach to coastal management that allows natural processes to occur while ensuring that coastal communities remain sustainable, economically resilient, and attractive places to live, work, and visit. Therefore, during the medium and long-term period (21 to 100 years), time-limited development related to the coastal strip, including hotels, retail premises, offices and leisure facilities, may be permitted where it can be demonstrated that the development will be safe throughout its anticipated lifespan, can be effectively remediated and restored upon the expiry of planning permission, and will not give rise to unintended harmful effects on coastal change, while delivering economic and social benefits to the local community.

Figure 7.4: Rother Coastal Change Management Area (CCMA) (east – Fairlight to Jury's Gap)

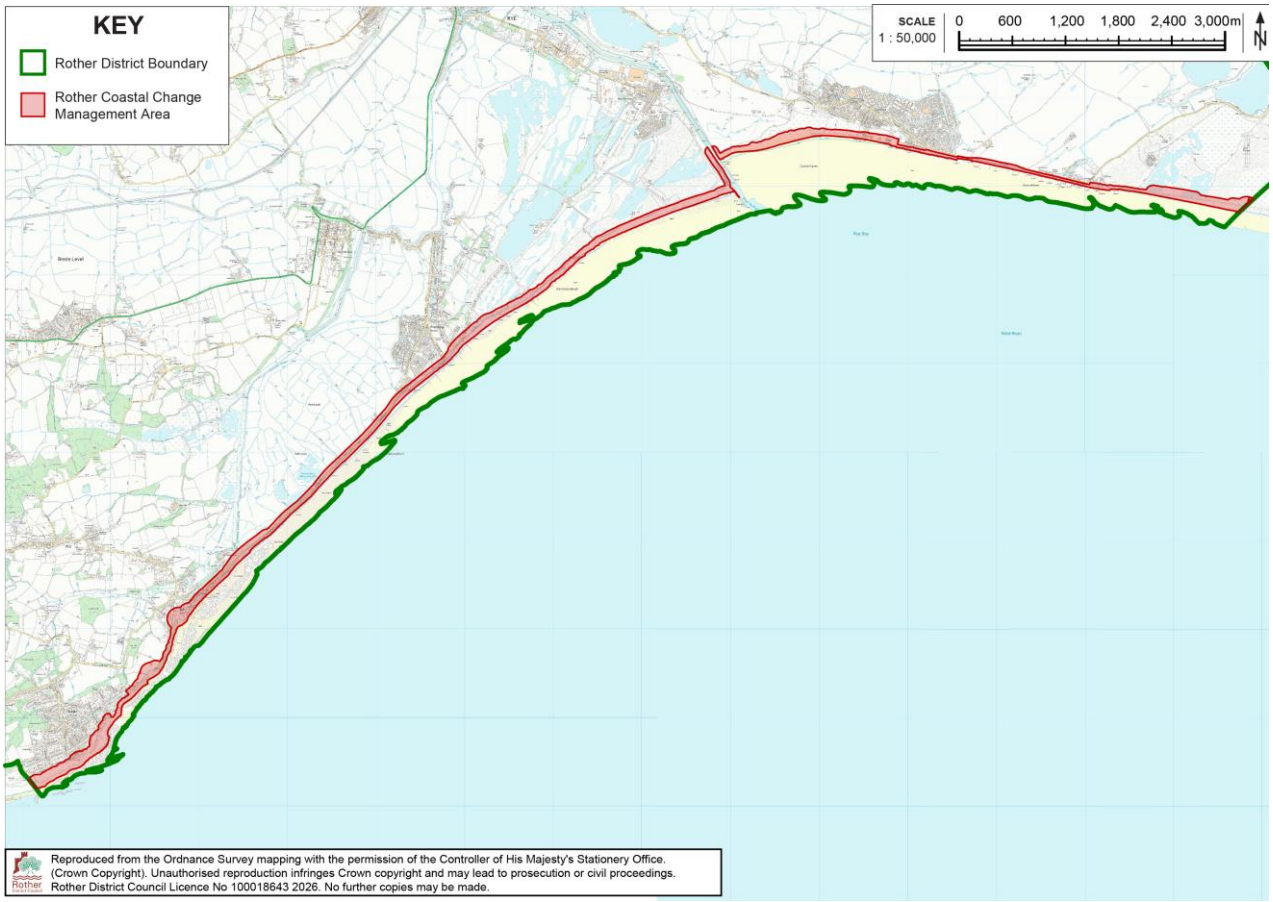
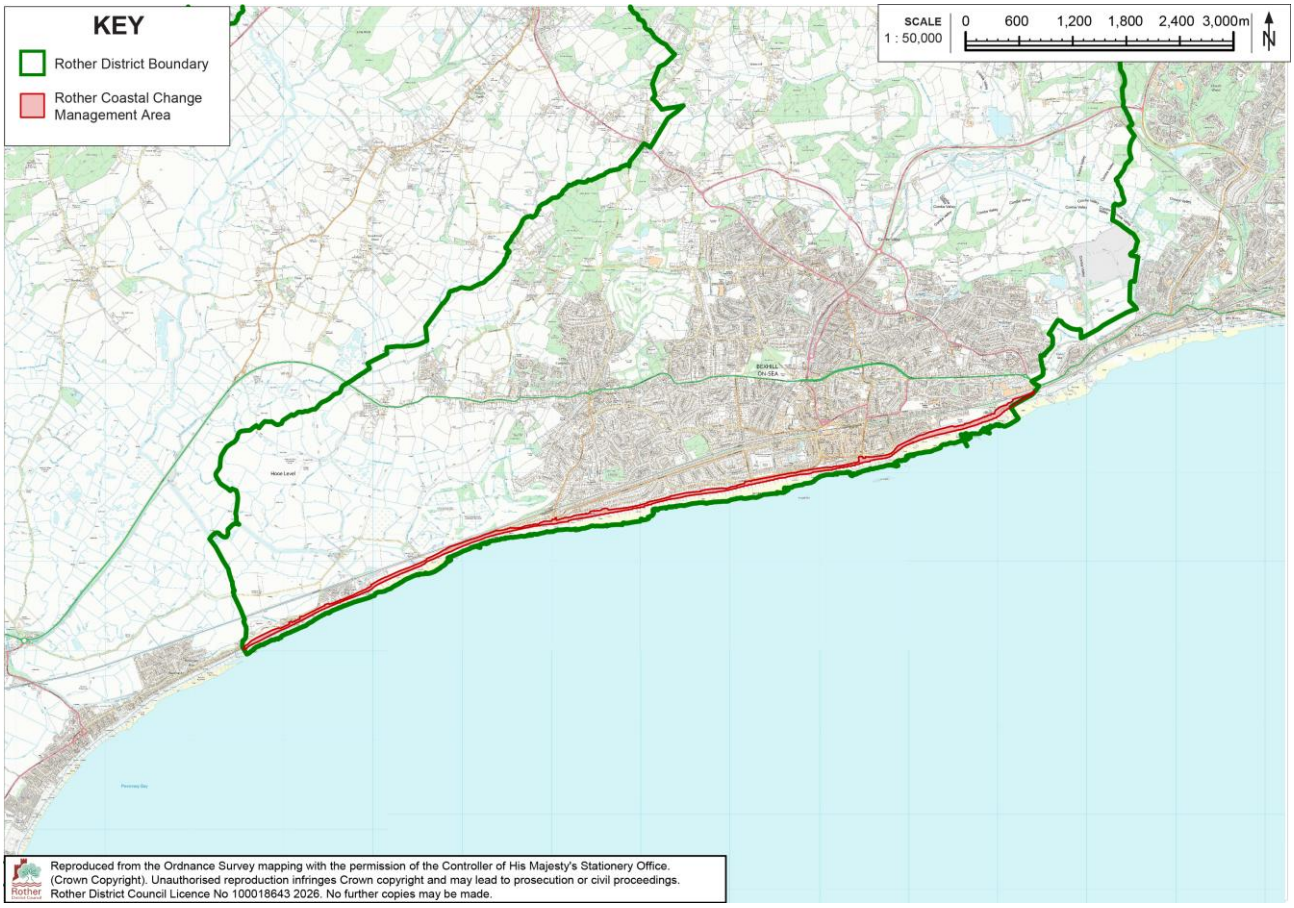


Figure 7.5: Rother Coastal Change Management Area (CCMA) (west – Normans Bay to Hastings borough boundary)



Habitats and Species

Policy ENV7: Biodiversity

Status	Strategic
Priorities	Green to the Core, Live Well Locally
Strategic Objectives	1, 3, 9

1. Rother's natural environment will be protected and, wherever possible, enhanced. This will be achieved by:

    a. Securing net gains for biodiversity and establishing ecological networks that are climate resilient;

    b. Enhancing opportunities for the public to appropriately access the natural environment, while protecting sensitive and designated areas;

c. Conserving and enhancing the biodiversity and ecological value of internationally, nationally, regionally and locally designated sites, habitats and species;

d. Supporting opportunities for management, restoration, creation and enhancement of habitats, including the joining up of existing priority habitats and species, in line with the opportunities identified in the East Sussex and Brighton & Hove Local Nature Recovery Strategy;

e. Restoring and enhancing the green and blue infrastructure network, particularly in localities where deficits are identified, in accordance with Policy ENV13 (Green & Blue Infrastructure).

f. Otherwise supporting opportunities which contribute to nature recovery in line with the East Sussex and Brighton and Hove Local Nature Recovery Strategy.

Key evidence and/or guidance

- Rother Green and Blue Infrastructure Study (2026)
- East Sussex and Brighton & Hove Local Nature Recovery Strategy (2026)
- Rother Environment Strategy 2020-2030

7.77 The purpose of this policy is to provide a positive strategic framework to help facilitate nature recovery across the district. Rother contains a rich and varied ecological network, comprising international, national and locally designated sites, irreplaceable habitats, priority habitats, wildlife corridors and the stepping-stones that connect them. The Local Plan presents a key opportunity to deliver enhancement and protection of the biodiversity within the district.

7.78 Biodiversity net gains and contributions to ecological networks will be sought for all relevant development, proportionate to the scale of the proposal and any potential impacts, in accordance with Policy ENV10 (Biodiversity Net Gain). Measures could include, for example, the protection and enhancement of features such as trees, hedgerows, ponds, meadows and grassland, and woodland, and the provision of additional habitats and landscaping within sites and along boundaries which can provide feeding and nesting opportunities as well as acting as habitat corridors.

7.79 Opportunities to enhance sensitive connections to the natural environment will be explored as part of development proposals. Consideration must be given to the fact that additional public access to designated sites has the potential to affect their integrity through recreational disturbance and other impacts. Policy ENV11 (Sustainable Access &

Recreation Management Strategy) addresses this issue for the Dungeness Complex of Habitats Sites. In all areas, proposals should refer to the Rother Green and Blue Infrastructure Study to focus access improvements on identified areas, in accordance with Policy ENV13 (Green and Blue Infrastructure).

7.80 Where there is a reasonable likelihood that a protected species may be present and affected by a proposal, comprehensive surveys will need to be undertaken by a suitably qualified ecologist to provide the evidence needed to allow a determination to be made on likely impacts, and licenses to be sought where necessary.

Policy ENV8: Habitats & Species

Status	Strategic
Priorities	Green to the Core
Strategic Objectives	1, 3, 9

1. Development must protect and not adversely impact on internationally, nationally and locally designated sites in the district, as well as other areas of importance for their geodiversity and biodiversity value. Development proposals likely to affect designated sites or irreplaceable habitats must meet the requirements set out in national planning policy relevant to the site designation or habitat status.

2. Development proposals which would entail the loss or deterioration of irreplaceable habitats will be refused, unless there are wholly exceptional reasons[150] and a suitable compensation strategy exists. Measures to prevent harm to ancient woodland and ancient or veteran trees, including the implementation of appropriate buffers to development, will be required as part of any relevant development proposal in accordance with Policy LAN1 (Landscape Character & Stewardship).

3. In all areas, whether within or outside a designated site, development proposals should identify and incorporate opportunities to protect, restore and create wildlife habitats, strengthen ecological networks and support the delivery of the East Sussex and Brighton and Hove Local Nature Recovery Strategy in accordance with Policy ENV9 (Local Nature Recovery Strategy). In addition, development proposals must:

    a. Retain, protect and provide appropriate buffers to ecological and geological features and provide suitable management of those features;

[150]As set out in national planning policy.

b. Incorporate biodiversity/ecological service enhancement features, designing-in provisions for wildlife;

c. Seek to eradicate or control any invasive non-native species on-site, and conserve and support the recovery of protected, priority, rare and notable species on-site.

d. An ecological survey and report, prepared by a suitably qualified professional, will be required for all development proposals likely to impact on designated sites, protected species or wildlife habitats.

4. The mitigation hierarchy will be applied so that:

a. Harm to biodiversity and geodiversity is avoided wherever possible; then

b. Appropriate mitigation is provided to ensure no net loss or a net gain is achieved; then

c. Where appropriate, compensation is delivered to offset any residual damage to biodiversity.

5. Biodiversity Net Gain will be required in accordance with Policy ENV10 (Biodiversity Net Gain).

Key evidence and/or guidance

- Rother Habitats Regulations Assessment (2026)
- Rother Green and Blue Infrastructure Study (2026)
- East Sussex and Brighton & Hove Local Nature Recovery Strategy (2026)
- Rother Environment Strategy 2020-2030

Habitats Sites and Ecological Features in Rother

7.81 The habitats and species in Rother are substantial and wide-ranging. There are large areas of internationally and nationally designated sites which, in total, cover approximately 9% of the district, together with many locally designated sites. Additionally, ancient woodland, which covers 16% of the district (the highest percentage in the South-East) has complex and rare biodiversity because of its undisturbed soil, ground flora and fungi. Many nationally defined[151] Habitats and Species of Principal Importance, referred to

[151] As defined through Section 41 of the Natural Environment and Rural Communities Act (2006, as amended).

herein as Priority Habitats and Species, are also represented. These are often found beyond the designated sites.

7.82 The East Sussex and Brighton and Hove Local Nature Recovery Strategy (LNRS) maps Areas of Particular Importance for Biodiversity (APIBs) and Areas that Could Become of Importance for Biodiversity (ACIBs). This is further detailed at Policy ENV9 (Local Nature Recovery Strategy).

7.83 There are two areas of internationally important wildlife sites extending into the district. The Pevensey Levels, to the south-west, is designated as a Ramsar site of international importance as a wetland habitat and as a Special Area of Conservation (SAC), comprising grazing marsh, wet grassland, ditches and freshwater wetlands. It is considered one of the most important wetland habitats in the region. The Pevensey Levels National Nature Reserve (NNR) also includes land within Rother. At the other (eastern) end of the district and extending into Folkestone and Hythe district, is the Dungeness Complex of Habitats Sites[152]which are designated for their value for birds, rare species and as wetland habitats. Policy ENV11 (Sustainable Access & Recreation Management Strategy) specifically addresses recreational impacts on the Dungeness complex.

7.84 There are many Sites of Special Scientific Interest (SSSI) within the district, protected for their wildlife and natural features. In addition, the High Weald National Landscape (HWNL), which covers some 83% of Rother, is designated for the purpose of conserving and enhancing landscape and scenic beauty, with the conservation and enhancement of wildlife and cultural heritage being important considerations. Some of the key High Weald character features are also designated as Priority Habitats (gill woodland, sandstone outcrops, ancient woodland, heathland, wildflower meadows and ponds). Therefore, consideration should be given to improvements in biodiversity that meet High Weald National Landscape objectives.

7.85 Locally designated sites are identified and selected locally using agreed criteria. There are some 60 Local Wildlife Sites in Rother, together with Local Nature Reserves and Local Geological Sites. These sites have an important role within the district's ecological network. These sites of local biodiversity value and the array of multi-functional green spaces that make up the 'Green Infrastructure' of the district provide recreational

[152] 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).

opportunities, flood management, climate change mitigation and 'green' corridors, as well as nature conservation. Regard should be had to Natural England's Green Infrastructure Framework and Policy ENV1 (Green & Blue Infrastructure).

7.86 Ancient woodland and ancient and veteran trees, and also fens, are considered irreplaceable habitat as per national planning policy. Proposals which could affect ancient woodland and ancient and veteran trees must also align with Policy LAN3 (Trees, Woodlands and Hedgerows) and the associated buffers and requirements set out in that policy. Larger buffer zones are more likely to be needed where the surrounding area is less densely wooded; where it is close to residential areas; and where it is steeply sloped. Assessment could also show that impacts – for example the effect of air pollution – are likely to extend beyond this distance. Ancient and veteran trees should be retained in situ and allowed to decay naturally unless it can be demonstrated this is not possible due to unacceptable risks to health and safety.

7.87 Hedgerows are also of considerable biodiversity importance, providing valuable habitat and ecological connections, and are protected. In rural areas, especially within the HWNL, hedgerows often form important enclosures as historic field boundaries, taking account of the well-preserved medieval characteristics present within the HWNL. As such, development will also need to demonstrate that hedgerows are protected and enhanced where necessary.

Protected and Important Species in Rother

7.88 Natural England provides guidance regarding construction near protected areas and wildlife whilst protecting species[153]. This guidance covers both European Protected Species and other species protected through the Wildlife and Countryside Act 1981 (as amended). The most commonly occurring in Rother include great crested newts, bats and dormouse. Other protected species that can be found in Sussex include badgers, water vole, common lizard, grass snake, slow worm and Roman snail.

7.89 Rother District Council holds a Great Crested Newt Organisational (or 'District') Licence granted by Natural England. The associated District Licensing Scheme, which is currently administered and managed by NatureSpace Partnership, provides an alternative licensing option for developers to address impacts on protected great crested newts by enabling a 'conservation payment' towards high-quality habitat creation and long-term

[153] Construction near protected areas and wildlife - GOV.UK

management and monitoring. It is based on a great crested newt landscape-scale conservation strategy, which aims to focus the creation of new habitats where they will be of maximum benefit to the species, whilst also reducing risk and uncertainty through the planning process for developers and planning authorities. The strategy results in a range of other biodiversity benefits and contributes towards nature recovery at the landscape scale.

7.90 There are a wide range of Priority Habitats and Species present in Rother. The habitats and species contained on the list are conservation priorities and are used to guide the Council in implementing their statutory duty to have regard to the conservation of biodiversity when carrying out their normal functions. Priority Habitats within Rother include woodland, maritime cliff and slopes, hedgerows and lowland meadows, and Priority Species include hedgehog, common toad, house sparrow, brown-banded carder bee and pennyroyal.

7.91 In addition to mandatory biodiversity net gain - see Policy ENV10 (Biodiversity Net Gain) - development proposals have the potential to benefit local biodiversity through the inclusion of integrated bird, bat and bee boxes and bricks. Built-in bricks (for swifts for example) are preferred as they are integrated into the building, cannot be removed and require less maintenance. Developments are expected to follow best practice guidance BS42021: 2022 in providing bird boxes at a ratio of one per dwelling. Hedgehog highways should also be created, through the provision of holes in garden walls and fences. Such interventions should be targeted where specific species can benefit most, as informed by ecological surveys and the Local Nature Recovery Strategy.

Policy ENV9: Local Nature Recovery Strategy

Status	Strategic
Priorities	Green to the Core, Live Well Locally
Strategic Objectives	1, 3
1. Development proposals must, proportionate to the scale of development, show how they contribute to the delivery of and align with the East Sussex and Brighton & Hove Local Nature Recovery Strategy, taking opportunities to implement and support the principles, priorities and measures set out in the strategy.	
Key evidence and/or guidance • Rother Green and Blue Infrastructure Study (2026)	

- East Sussex and Brighton & Hove Local Nature Recovery Strategy (2026)
- Rother Environment Strategy 2020-2030

7.92 Local Nature Recovery Strategies set out areas of current importance for biodiversity, and areas that could be important for biodiversity where nature could be both created and restored, along with measures for nature recovery. For many decades nature conservation in England has been founded in large part upon the identification and protection of key areas of habitat deemed our most important for nature conservation. At the core of this effort has been the notification of Sites of Special Scientific Interest, covering more than a million hectares or over eight per cent of England. Many are further protected through additional legal safeguards operated under European Union Directives.

7.93 The application of controls to protect this network of key areas is vital in safeguarding many of our best wildlife and geological areas this policy sets these criteria in this plan. However, evidence[154] has shown that this is not enough to see nature thrive and to meet the needs of society.

7.94 The Environment Act 2021[155] places a duty on local authorities to have regard to its Local Nature Recovery Strategy – to create more, bigger, better and connected areas of wildlife-rich habitat benefiting nature and people. In Rother District, this is the East Sussex and Brighton & Hove Local Nature Recovery Strategy (LNRS)[156].

7.95 The Government's ambition is that Local Nature Recovery Strategies will become the new focal point for a broad range of land-use and management activities, and in so doing deliver a step-change in the effectiveness of the action taken for nature recovery and associated environmental improvement.

7.96 The East Sussex and Brighton & Hove LNRS was published in 2026. It includes 24 locally agreed priorities for the key habitats in the area, supported by 106 achievable actions (or measures). There are priorities and measures relevant to both rural and urban locations.

7.97 The LNRS includes mapping which identifies "Areas of Particular Importance for Biodiversity" (APIBs), defined as designated sites and areas of irreplaceable habitat, and "Areas that Could become of Importance for Biodiversity" (ACIBs). ACIBs are areas where it is proposed that effort should be concentrated to restore habitat, to achieve the

[154] Including the "State of Nature" report (2023)
[155] Environment Act 2021
[156] Publications | Sussex Nature Recovery

most for biodiversity and the wider environment and achieve greater connectivity of similar biodiverse habitats across the landscape. Under the Environment Act, Local Planning Authorities must be aware of those areas mapped and identified in the relevant LNRS and the measures proposed in them. In planning decisions, the LNRS is an evidence base which contains information that may be a material consideration in the planning system.

7.98 Development proposals which align with and support the delivery of measures identified in the LNRS will be supported. Developers should use the LNRS to help inform the creation of biodiversity-rich developments that deliver multiple benefits for nature and people, and to refer to when planning habitat creation as part of development through Biodiversity Net Gain. Proposals should show that they have explored opportunities to better understand the location of development in relation to its wider environment and reflect this in the design and delivery of biodiversity on site.

Policy ENV10: Biodiversity Net Gain

Status	Non-strategic
Priorities	Green to the Core
Strategic Objectives	3

1. All qualifying development proposals must achieve a minimum 20% Biodiversity Net Gain over a pre-development biodiversity value (as appropriately calculated) and be accompanied by a Biodiversity Net Gain strategy that:

    a. Establishes the pre-development biodiversity value of the development site in line with the most up-to-date legislation;

    b. Demonstrates that the mitigation hierarchy has been employed in securing biodiversity net gain;

        i. Avoidance

        ii. Mitigation

        iii. Compensation

    c. Where on-site provision is evidenced as not possible in line with the Biodiversity Gain Hierarchy, locates off-site provision (as close as possible to the development site, or if that is not possible, elsewhere

within the Rother Plan Area) where it should contribute towards strategic networks such as those identified within the East Sussex Local Nature Recovery Strategy;

d. As a last resort, and with the agreement of the local planning authority that on or off-site provision is not possible, details the purchase of credits for biodiversity gain through the national biodiversity credit scheme;

e. Provides long-term management details of how the biodiversity net gain will be maintained for at least 30 years (or time defined by most up-to-date legislation, if that period is longer) after the development is completed.

Key evidence and/or guidance

- Rother Green and Blue Infrastructure Study (2026)
- East Sussex and Brighton & Hove Local Nature Recovery Strategy (2026)
- Rother Environment Strategy 2020-2030

7.99 The Government has produced guidance on the statutory requirements for Biodiversity net gain[157]. Development has an important role in contributing to nature recovery. The purpose of this policy is to ensure biodiversity net gain is achieved through development to help protect and enhance the natural environment, which in turn, will support the long-term adaptability and resilience to climate change across the district.

7.100 The approach supports and reinforces other policies throughout this Local Plan and should be used in conjunction with that set out in Policies ENV7 (Biodiversity) and ENV8 (Habitats & Species).

7.101 An assessment of the existing biodiversity value of the onsite habitat of the development site (the pre-development value) will be required at the point that planning permission is applied for. In order to establish the pre-development value, consideration will be given to whether any deliberate harm to the biodiversity value has taken place in the recent past. Where there is evidence of deliberate neglect and/or damage, or the relevant date has not been subsequently agreed with the Council, the pre-development biodiversity value of the onsite habitat will be taken as that directed in the Environment Act[158].

[157] Biodiversity net gain - GOV.UK
[158] Environment Act 2021

7.102 A key element of achieving biodiversity net gain is the correct application of the mitigation hierarchy[159] in the initial stages to ensure what is delivered is additional to what is already required through the planning process. Measurable biodiversity net gains will be sought for all qualifying development, and at the very least in accordance with the minimum requirements of the policy and proportionate to the scale of the proposal and any potential impacts and any subsequent mandatory targets.

7.103 The Biodiversity Gain Hierarchy[160] sets out the priority of retention of onsite habitats of medium or higher distinctiveness and the enhancement and creation of new habitat on site in favour of the loss of on-site gains. Development and biodiversity net gain proposals will be required to demonstrate the consideration and feasibility of each stage rather than assume provision can be accommodated off-site through compensation at the outset.

7.104 In following the mitigation hierarchy and biodiversity gain hierarchy, loss of habitats on sites is avoided. If it is demonstrated that it is not possible to avoid, mitigate and compensate all impacts on site, then compensatory habitat creation should be obtained firstly through a combination of on-site and local third-party schemes, then local third-party schemes only, and lastly through any statutory credit scheme. Off-site provision should be informed by and support wider policy objectives and those of the East Sussex and Brighton & Hove Local Nature Recovery Strategy.

Policy ENV11: Sustainable Access & Recreation Management Strategy

Status	Non-strategic
Priorities	Green to the Core, Live Well Locally, Thriving Local Economy
Strategic Objectives	3, 4

1. Development proposals that may have an increase in recreational impacts to the Dungeness Complex of Habitats Sites (for example, from walking, water-based sports, cycling, dog walking and tourism related development), resulting in a likely significant effect, alone or in-combination with other plans or projects, must provide appropriate mitigation to avoid an adverse effect on the integrity of the sites.

[159] NPPF, 2024 para 193 a) - National Planning Policy Framework
[160] The Town and Country Planning (Development Management Procedure) (England) Order 2015

2. The Council is working with Folkestone & Hythe District Council to establish and agree a strategic approach to mitigation. Once available, this will provide a mechanism for development to appropriately mitigate any identified impacts.
Key evidence and/or guidance • Rother Habitats Regulations Assessment (2026) • Dungeness Complex Sustainable Access and Recreation Management Strategy

7.105 Rother includes areas and sites that are protected for their environmental and ecological importance. Many of these provide benefits to local communities and visitors with opportunities for leisure and recreation. However, as part of the successful management of these areas and sites, there is sometimes a need to proactively protect them from disturbance and overuse.

7.106 The potential impact of tourism and recreation on the Dungeness Complex of Habitats Sites was an issue first highlighted through the Habitat Regulations Assessment of the Rother Core Strategy. Therefore, the Council, in partnership with Folkstone & Hythe District Council and with advice from Natural England, prepared a Sustainable Access and Recreation Management Strategy (SARMS) (2017) for the area. The SARMS provides a strategic, cross-boundary approach to managing recreational pressure and disturbance, both in relation to additional usage resulting from development and more generally to ensure sensitive management of the habitats. It identifies a need to raise the profile of the nature conservation value of the strategy area in a way that will also benefit the visitor economy, to improve visitor education and, in some areas, change behaviour to support protected habitats and species.

7.107 The SARMS now needs to be updated, including the undertaking of new visitor surveys (over a 12-month period) to determine the area from which visitors who may be impacting on the habitats travel. This will inform the necessary mitigation measures to be set out within the strategy. The Council is proactively working with Folkestone and Hythe District Council and Natural England to agree the scope of and commence the update. Policy ENV11 provides the policy basis by which to require implementation of the revised strategy, once this is available; an approach that has been agreed with Natural England.

7.108 In the meantime, proposals which could result in an increase in recreational impacts to the Dungeness Complex of Habitats Sites will need careful consideration and assessment

under the Habitats Regulations to ensure no adverse effects, and where necessary, mitigation measures will need to be secured as part of the planning permission. Until the new SARMS is completed, the existing SARMS (2017) will be used to inform appropriate mitigation, also in consultation with Natural England.

Policy ENV12: Bewl Water

Status	Non-strategic
Priorities	Green to the Core, Live Well Locally, Thriving Local Economy
Strategic Objectives	1, 3

1. Development proposals within or affecting the setting of Bewl Water must:

    a. Conserve and enhance its distinctive landscape character and scenic beauty.

    b. Conserve and enhance its significant biodiversity and ecological value, in line with Policy ENV7 (Biodiversity).

    c. Protect local amenity particularly to maintain the area's tranquillity.

    d. Maintain dark skies, in line with Policy LAN4 (Light Pollution & Dark Skies).

    e. Safeguard Bewl Water as a recreational, economic and social amenity for the local community and visitors.

    f. Protect Bewl Water as a key freshwater resource.

2. Development proposals for compatible recreational uses, including sensitive water-based recreation, will be supported subject to compliance with the criteria above and other Local Plan policies.

Key evidence and/or guidance

- Rother Green and Blue Infrastructure Study (2026)
- East Sussex and Brighton & Hove Local Nature Recovery Strategy (2026)
- The 2016 East Sussex County Landscape Assessment
- High Weald AONB Management Plan 2024-2029

7.109 The policy recognises and protects the special landscape, ecological and environmental qualities of Bewl Water, as well as to support appropriate recreational uses, consistent with other policies in Chapter 7 and the Local Plan.

7.110 Bewl Water Reservoir is situated at the northern edge of the district and straddles the boundaries with the adjacent authorities of Tunbridge Wells and Wealden. With an area of some 310 hectares and maximum capacity of 31,000 megalitres, it is an important regional water resource and the largest inland water body in the southeast. It lies wholly within the High Weald National Landscape.

7.111 The reservoir was dammed in the mid-1970s and featured the design of landscape architect Dame Sylvia Crowe. The 2016 East Sussex County Landscape Assessment describes Bewl Water as being formed from the upper tributaries of the Bewl River, situated within a landscape characterised by gentle spurs, stream valleys, steep wooded ghylls, ancient woodlands and historic farmsteads.

7.112 The reservoir is a highly significant area for wildlife, confirmed by its designation as a Local Wildlife Site. The area's wetland habitat, tranquillity and dark skies mean that it is an important site for a wide variety of bird species including water fowl and migrating birds in the spring and autumn. More specifically, Bewl Water is also a notable habitat for the Common Gull and Black-Headed Gull, of which there are very large populations during wintering months.

7.113 The reservoir is also a significant recreational amenity, drawing upon a wide catchment area, that makes an important contribution to local health and wellbeing. It offers recreational activities including walking, cycling, rowing, sailing and fishing. Established water sports clubs, facilities and associated infrastructure play an important role in enabling public participation in recreation at Bewl Water. The long-term retention and improvement of such facilities will be supported where consistent with the area's landscape and ecological sensitivities, and the criteria of this policy.

7.114 Development pressures, including from tourist-related development at Bewl Water have the potential to impact on its landscape, tranquillity, dark skies, and biodiversity. Careful consideration must therefore be given to such proposals. This will ensure that Bewl Water can continue to function as an open space for quiet, low-impact daytime recreation connected to its natural features.

7.115 As Bewl Water extends across three local authority boundaries, the Council will continue to work constructively with neighbouring authorities, statutory bodies and other stakeholders to promote a coordinated approach to the protection, management and enjoyment of the reservoir and its setting.

7.116 No specific boundary for the setting of Bewl Water is shown on the Policies Map. This is deliberate, as the extent of the reservoir's setting may vary according to the particular development proposal and the characteristics being considered. The application of this policy will therefore be considered on a case-by-case, considering the location, nature and scale of development.

Green & Blue Infrastructure & Rights of Way

Policy ENV13: Green & Blue Infrastructure

Status	Strategic
Priorities	Live Well Locally, Green to the Core, Thriving Local Economy
Strategic Objectives	1, 3, 4, 9

1. The protection, enhancement, restoration and provision of green and blue infrastructure (GBI), including sports and recreation spaces (both formal and informal), allotments, community gardens, and orchards, will be achieved by:

Safeguarding existing green and blue infrastructure

a. The loss of existing open space, sports and recreational buildings and land, including playing fields and formal play spaces, will not be permitted unless it meets the tests set out in the NPPF.

Enhancement and new provision

b. In addition to meeting the Open Space Standards in Policy ENV14, development proposals, where relevant, will be expected to enhance or restore existing GBI provision and create new provision on-site that connects to the wider GBI network, particularly in localities

where qualitative or quantitative deficits are identified by evidence, including the Rother Green and Blue Infrastructure Study (2026).

c. Proposals for the improvement and restoration of existing, or provision of new, GBI will be supported.

d. Development that creates opportunities to enhance public accessibility, active travel connectivity, and enjoyment of the green and blue infrastructure network, while protecting sensitive, designated sites for nature conservation via considerate landscaping schemes, access management, and appropriate buffer zones, will be supported.

Quality and design of new GBI

e. Developments involving GBI provision are required to demonstrate how their proposals:

   i. Respect and enhance the landscape character and distinctiveness of the local area;

   ii. Respond to and integrate with the strategic GBI network where possible, providing multifunctional links to existing GBI outside the development's boundaries;

   iii. Safeguard and positively integrate existing GBI corridors and assets, including mature trees, hedgerows, ponds and watercourses, with appropriate ecological and landscape buffers where necessary;

   iv. Incorporate GBI features of varying scales into the development (e.g., street tree provision, biodiversity-enhancing planting, green roofs, green walls);

   v. Are designed to be multifunctional, actively aiding in climate change adaptation through features such as nature-based SuDS, nature recovery, urban cooling, and biodiversity enhancement in line with Policy ENV7 (Biodiversity) and the East Sussex and Brighton and Hove Local Nature Recovery Strategy.

f. Developments of two hectares or more or 50 dwellings or more are required to submit a comprehensive GBI Plan as part of their proposals. This must be prepared in accordance with the Rother Green and Blue Infrastructure Study (or relevant adopted guidance).

Consideration of blue infrastructure

g. Sensitive water-based recreation along the coast and in other bodies of water will be supported, subject to compliance with, where relevant, Policies and ENV11 (Sustainable Access & Recreation Management Strategy) and ENV12 (Bewl Water).

h. Development on sites containing or adjacent to a water course or water body (Blue Infrastructure) must demonstrate there is no unacceptable adverse impact on biodiversity, the environment and local amenity, in accordance with other Local Plan policies.

Management

i. All relevant proposals are required to provide appropriate specification and maintenance plans for the proposed GBI throughout the lifetime of the development.

j. Proposals involving cross-boundary water-based recreation activities that benefit from waters within Rother must be accompanied by a detailed management plan which considers impacts including those on biodiversity, environment, and amenity.

k. Appropriate arrangements and funding for the future long-term management and maintenance of GBI must be identified and implemented. Where appropriate, the council will secure this via planning conditions and/or planning obligations.

Key evidence and/or guidance:

- Rother Green and Blue Infrastructure Study (2026)
- Rother Climate Strategy 2030
- Rother Environment Strategy 2020-2030
- Hastings and Rother Playing Pitch and Built Facilities Strategy 2023 – 2039

7.117 The NPPF is clear that plans should take a strategic approach to maintaining and enhancing GBI networks, plan for the provision of open spaces, integrate green infrastructure to promote healthy lives, mitigate climate change, and secure biodiversity enhancements. This policy addresses these national requirements by setting out a comprehensive approach to the district's natural networks.

7.118 For the purposes of this plan, Green and Blue Infrastructure (GBI) refers to a network of multi-functional green spaces (such as parks, woodlands, allotments, and green roofs) and blue spaces (such as rivers, coastlines, and other water bodies) that deliver a wide range of environmental, economic, health, and social benefits. Open Space, which is subject to

Policy ENV14, comprises GBI, but GBI also covers a wider range of spaces, not all of which are subject to the standards set out in Policy ENV14.

7.119 GBI plays a key role in boosting the vitality of communities and has a direct positive impact on their physical and mental health and wellbeing. Access to a greener environment is associated with better mental health and wellbeing outcomes, and greenspace can help bind communities together. These spaces can also help address the growing issues of climate change, particularly by providing shade and cooling to the users in an otherwise warming environment, reducing water run-off, and storing carbon. GBI is therefore crucial to the success of this Local Plan's Green to the Core and Live Well Locally overall priorities.

7.120 These spaces should be designed to support comfort, social interaction, health and wellbeing. This may include the provision of seating, shade through planting or other design measures and, where appropriate, access to drinking water, particularly in areas intended for longer stays or higher levels of activity.

7.121 Opportunities for food growing, such as allotments and community gardens, should be incorporated into green and blue infrastructure networks where appropriate, contributing to health, wellbeing and community cohesion.

7.122 This policy aims to ensure that Rother's network of GBI will be protected, enhanced and managed to provide a multi-functional, high-quality open space resource, capable of delivering opportunities for recreation, health and wellbeing, ecological connectivity, biodiversity net-gain as well as wider ecosystem services for climate change adaptation.

Safeguarding existing green and blue infrastructure

7.123 The NPPF places strong protections on existing open space, sports, and recreational land. This policy ensures that existing GBI is safeguarded from development. Loss will only be permitted in exceptional circumstances where the strict, criteria-based tests set out in the NPPF are met, such as the land being proven surplus to requirements, or replaced by equivalent or better provision.

Enhancement and new provision

7.124 The Council actively supports development that connects to the wider GBI network, addresses identified local deficits, and improves public access, provided this is balanced with protecting sensitive nature conservation sites from recreational disturbance.

Additionally, relevant development proposals will be expected to enhance or restore existing GBI provision and create new provision on-site that connects to the wider GBI network, particularly in localities where qualitative or quantitative deficits are identified. This is in addition to meeting the Open Space standards (where relevant) set out in Policy ENV14. This policy will be applied proportionately according to the scale, nature, and location of the proposed development. The provision of new on-site GBI will not usually be required for householder applications, minor changes of use, or small, constrained sites where physical opportunities for on-site provision do not exist.

7.125 Green and blue infrastructure should form a connected and accessible network of spaces within and beyond development sites. This may include public squares, green corridors and routes that provide convenient and inclusive connections into, through and between developments, linking to the wider green and blue infrastructure network.

Design of new GBI

7.126 GBI must be treated as integral to the design of new development, not as an afterthought. Policies LWL5 and LWL6 set out how existing site features and green and blue infrastructure should inform the design, capacity and layout of development. Existing GBI assets should be identified early and used, where appropriate, to structure buildings, streets, movement routes, open spaces and landscape provision as part of an integrated design response. Integrating multi-functional GBI of varying scales (from street trees to green roofs) is essential to achieving statutory Biodiversity Net Gain (BNG) and should align with the principles of Natural England's Green Infrastructure Framework.

7.127 To ensure strategic delivery, major developments (two hectares or more, or 50+ dwellings) must produce a comprehensive GBI Plan. The GBI Plan should be prepared as an integral part of the site masterplanning and design process and coordinated with the design, landscape and drainage information required by Policies LWL5 and LWL6. Where Policy LWL5 requires the principles of Building with Nature to be applied, the GBI Plan should demonstrate how those principles have informed the design, delivery and long-term management of GBI. The GBI Masterplan may form part of wider masterplanning or landscape information provided that the requirements of this policy are clearly addressed.

7.128 Applicants should refer to the Rother Green and Blue Infrastructure Study (2026) which provides guidance and relevant mapping of opportunities and deficits to inform proposals and meet this policy requirement.

Blue infrastructure

7.129 Some of Rother's key recreational facilities come in the form of its waters, including the coast, and Bewl Water - further addressed in Policy ENV12 (Bewl Water) - which crosses into both Tunbridge Wells Borough Council and Wealden District Council. Rother's water assets play a multi-functional role supporting a vibrant array of water-based recreation activities, including sailing clubs, yachting, rowing, and paddle sports along the coastline and inland water bodies, while acting as major tourist attractions and delivering positive impacts on health and wellbeing. However, the growth and management of these water-based activities need to be balanced with a need to protect the environment, particularly where these overlap with or adjoin statutorily protected sites. Because water bodies frequently cross administrative boundaries, development affecting shared blue infrastructure must demonstrate a sensitive, coordinated approach, often requiring a cross-border management plan.

Management and maintenance

7.130 For GBI to successfully deliver its intended benefits over time, it must be properly maintained. Furthermore, all developments incorporating GBI must demonstrate that viable, long-term funding and management arrangements are in place before permission is granted, which the Council will secure via planning conditions or Section 106 legal agreements. Where a Stewardship Plan is required by Policy LWL5, the management, maintenance, funding and governance arrangements required by this policy may be incorporated within that plan, provided that the requirements of both policies are clearly addressed.

Policy ENV14: Recreational Facilities & Open Space

Status	Non-strategic
Priorities	Green to the Core, Live Well Locally, Thriving Local Economy
Strategic Objectives	4, 8, 9

Amount and type of provision

1. Development proposals should protect and maximise opportunities to incorporate publicly accessible, high-quality open space, as well as enhance local provision.

2. Residential developments will be required to provide high-quality open space on-site, wherever possible, in accordance with the standards set out below, which are minimum standards.

Off-site provision

3. Off-site provision of open space will only be acceptable where it can be clearly demonstrated that:

    a. Site constraints prevent or otherwise inhibit the incorporation of adequately sized and practically usable open space on the proposed development site; or

    b. There are demonstrable wider public benefits for delivering the required provision off-site; or

    c. The proposed development already falls within the defined accessibility catchment (see below) of an existing, publicly accessible open space of the relevant typology, and that space has the capacity to be improved in quality or value to accommodate the additional population pressure.

4. Where the Council is satisfied that the requirements of (3) above are met, planning contributions and/or legal agreements will be used to secure appropriate high-quality and conveniently accessible off-site provision, in line with the required minimum standards, and/or to secure significant enhancements to existing provision within the defined accessibility catchment of the application site.

Design of recreational and sports facilities and open space

5. Where open space, sports, play, or ancillary recreational facilities are provided by new development they must be of a high-quality design, particularly to ensure they are enduring, inclusive and fit for purpose.

6. Development proposals must demonstrate that the provision:

    a. Is integral to the overall layout and design of development, and clear focal points for activity, and not relegated to leftover, unusable, or marginal land;

    b. Is located in prominent, well-used and well-overlooked areas of the development, ensuring they are safe, accessible and benefit from natural surveillance;

c. Essential ancillary facilities (such as toilets, café, waste management points, maintenance access, changing rooms) are adequately provided and well positioned to support the operation of the site;

d. Uses ground surfaces and building materials, and incorporate SuDS, that actively balance high visual amenity with long-term durability, low-maintenance requirements, and accessibility for all user groups.

7. For formal playing pitches or outdoor sports facilities, the type, layout and technical specification must align with Rother's Playing Pitch and Built Facilities Strategy and relevant Sport England design standards.

8. Development proposals will be assessed against the latest Building for a Healthy Life or its successor document(s).

Open Space Standards

	Ha per 1,000 Residents			
	10 to 20 dwellings	21 to 100 dwellings	100 to 500 dwellings	>500 dwellings
Parks and gardens				0.80
Amenity Greenspace				0.60
Natural and semi-natural				1.80
Outdoor sport pitches, courts and greens, tracks and trails			1.60	1.60
Equipped designated play areas		0.25	0.25	0.25
Informal play provision	0.30	0.30	0.30	0.30
Ha per 1,000 Residents	**0.30**	**0.55**	**2.15**	**5.35**

Open Space Standards (ha per 1,000 residents by development size)

Typology	Hierarchy	Criteria	Access catchment size
Accessible greenspace	Doorstep	At least 0.2 ha	200 m
Accessible greenspace	Local	At least 2 ha	300 m
Accessible greenspace	Neighbourhood	At least 10 ha	1 km
Accessible greenspace	Wider neighbourhood	At least 20 ha	2 km
Accessible greenspace	District	At least 100 ha	5 km
Allotments	NA	NA	1 km

Accessibility Catchment Standards

Key evidence and/or guidance

- Rother Green and Blue Infrastructure Study (2026)
- Hastings and Rother Playing Pitch and Built Facilities Strategy (2023)
- Homes England, Building for a Healthy Life (2026)
- Sport England's guidance and tools, such as Playing Pitch Demand Calculator including standard facility costs

7.131 The NPPF requires planning policies to ensure access to a network of high-quality open spaces and opportunities for sport and physical activity, insists that policies are based on robust, up-to-date assessments of need, and protects existing spaces from development.

7.132 This policy translates those national requirements into local action, directly supporting the Local Plan's overall priorities. It delivers on Live Well Locally by ensuring new and existing residents have immediate access to high-quality spaces for physical health, mental wellbeing, and social interaction. Simultaneously, it delivers on Green to the Core by mandating that these spaces perform critical environmental functions, such as climate adaptation and biodiversity enhancement.

Quantum and Type and Accessibility of Provision

7.133 The demand for open space generated by new development must be met. The amount, type and accessibility of space required is supported by the Council's up-to-date evidence base, including the Hasting and Rother Playing Pitch and Built Facilities Strategy, the Green and Blue Infrastructure Framework Study, and the Local Plan Viability Assessment. Meeting open space needs requires spaces to be within realistic, safe, and convenient walking distances of people's home. The accessibility catchments set out in the policy are based on Natural England's Accessible Greenspace Standards and the Rother Green and Blue Infrastructure Study (2026). Accessible greenspace is structured into a size-based hierarchy; residential development will be assessed against this tiered network, ranging from smaller 'doorstep' and 'local' spaces catering for daily recreation close to home, to larger 'neighbourhood' and 'district' spaces. Full definitions and typology descriptions are set out in the Rother GBI Study.

7.134 While this policy seeks to maximise open space opportunities across the district, its requirements will be applied proportionately to the scale, nature, and impact of the proposal. Not all types of development are expected to provide open space or financial contributions. Minor schemes—such as householder extensions, small-scale commercial alterations, or changes of use that do not create a net increase in resident population or recreational pressure—will be exempt from these standards. The policy primarily targets

new residential developments that result in a net gain in dwellings, as well as major non-residential proposals that attract substantial numbers of new visitors, users, or employees to an area.

Commuted sums

7.135 While the Council's strong preference is for open space to be integrated directly into new developments, commuted sums will be required on constrained or high-density schemes where on-site provision would result in fragmented, unusable strips of land. Similarly, while the "Outdoor sport pitches, courts and greens, tracks and trails" standard (1.60 ha per 1,000 population) applies to developments of 100 or more dwellings, where site constraints or generated demand mean a standalone formal playing pitch cannot practically be accommodated, provision should focus on compact on-site facilities (such as MUGAs, padel/tennis courts, or trim trails) or an off-site financial contribution will be sought.

7.136 Where off-site financial contributions towards formal playing pitches and outdoor sports facilities are required under Criterion 3, the Council will refer to Sport England's Playing Pitch Demand Calculator (PDC) in conjunction with Sport England's published facility and facility costs. Financial contributions secured through Section 106 agreements will be directed towards deliverable projects and capacity improvements identified in the Hastings and Rother Playing Pitch and Built Facilities Strategy. This Strategy, including its Stage E reviews and any successor strategy, provides the qualitative and strategic evidence base for formal pitch sports across the district. It assesses specific supply, capacity, and demand pressures, providing an up-to-date action plan to direct S106 financial contributions towards; this includes multi-pitch hub upgrades, artificial grass pitches (3G/AGP), drainage, and pavilion improvements.

7.137 Provision for children and young people is secured through dedicated standards for informal play provision (from 10+ dwellings) and equipped designated play areas (e.g. LAPs, LEAPs, and NEAPs from 20+ dwellings). These spaces must be thoughtfully integrated into the layout of the development to ensure safe doorstep play opportunities for young families.

Design of recreational facilities and open space

7.138 The quality of an open space is just as important as its quantity. Open space and nature should be carefully integrated into development proposals as they help to reinforce a

sense of place and local identity. Open spaces must not be treated as an afterthought fitted into undevelopable areas of a site.

7.139 Open space and recreational facilities should be designed to be inclusive and welcoming to all users. This includes ensuring that spaces feel safe and accessible for women, girls and other potentially vulnerable groups, and that people of all ages and abilities are able to use them confidently. Careful consideration should be given to visibility, lighting, access, and the relationship between spaces and surrounding development. Design should also support shared use of spaces where appropriate, enabling different age groups and users to interact positively within the same environment.

7.140 In addition to aligning with the national Building for a Healthy Life framework and relevant Sport England technical guidance, applicants must address four key design and operational factors set out in the policy:

- Central integration: open spaces should be integrated as prominent, central anchors within a site plan. Layouts should ensure these spaces are well-defined and naturally overlooked by surrounding building frontages. This active surveillance inherently enhances community safety, deters anti-social behaviour, and elevates the spatial character of the neighbourhood;

- Prominence and natural surveillance: Facilities must be located in active, well-used areas with direct overlooking from surrounding active building frontages. This natural surveillance enhances actual and perceived safety, deters anti-social behaviour, and encourages regular community use;

- Ancillary facilities: For destination parks or multi-pitch sports facilities, spaces require physical infrastructure to maximise their utility. Proposals must explicitly plan for well-positioned ancillary installations—including changing rooms, public toilets, waste disposal points, and secure maintenance access gates—without dominating the open landscape or generating noise impacts on nearby properties;

- Materials: Surface materials must be durable and highly legible to satisfy accessibility requirements for all user groups. Mixed colours may appear as hazards or barriers to those with visual conditions; similarly, varied patterns can make pathways less legible, causing disorientation.

Generally, the design quality of open (or public) spaces outweighs the quality of materials used. Even basic materials can support a strong design, while expensive materials cannot rescue a poor one.

7.141 Public open space provided within a new development should not be designed for the exclusive use of those occupiers but form an extension to the existing network of spaces.

Policy ENV15: Public Rights of Way

Status	Non-strategic
Priorities	Live Well Locally, Green to the Core
Strategic Objectives	3, 4, 8, 9

Protection and integration

1. Where a proposed development site includes or is adjacent to a public right of way (PRoW), the proposal is required to demonstrate how it:

    a. Causes no unacceptable adverse impact on the character, visual amenity, safety, or public enjoyment of the route;

    b. Maintains the PRoW as a standalone facility, distinct from the development's vehicular highways and footways;

    c. seamlessly integrates the PRoW into the site's layout, providing new, inclusive access points to the existing network for users of all ages and abilities; and

    d. protects, and where possible enhances, the alignment, landscape features (such as ancient banks and hedges), and setting of any identified historic routeway.

Enhancement and new provision

2. The enhancement of existing and creation of new PRoWs, greenways, and active travel routes will be supported where they:

    a. Improve active travel connectivity including between settlements, visitor attractions, and local services; particularly where they address an identified local deficiency in access;

    b. Provide upgrades or financial contributions towards the improvement of the existing PRoW network, where a development is likely to

increase recreational pressure. Improvements should ensure the network remain resilient and fit for purpose;

c. Are appropriately designed having regard to the built, natural, and historic setting; and

d. Are appropriately located and managed to protect habitats including those sensitive to recreational pressures, in accordance with Policy ENV11 (Sustainable Access & Recreation Management Strategy) where relevant.

Alterations and diversions

3. The permanent loss or closure of a PRoW will be resisted.

4. Where the diversion or alteration to a PRoW is proposed, it will only be acceptable where it is strictly necessary to facilitate the development and it is suitably demonstrated that:

a. The proposed alternative route provides an equal or greater convenience, safety, and visual amenity for users;

b. The historic alignment, character, and heritage value of any historic routeway is preserved; and

c. Any alterations within or affecting the setting of the High Weald National Landscape strictly conserve and enhance the natural beauty and scenic quality of the landscape.

Key evidence and/or guidance:

- The East Sussex Local Cycling and Walking Infrastructure Plan (2020) (LCWIP)
- High Weald AONB Management Plan 2024-2029

7.142 The NPPF expects planning policies to protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users. As a predominately rural district, Rother benefits from over 930km of Public Rights of Way (PRoW) primarily managed by East Sussex County Council. In rural areas, these routes can offer a safer form of connection than would otherwise be had through walking, wheeling or cycling on roads and lanes. Across the District, they are an important asset in our towns and villages in promoting physical activity. These include footpaths and bridleways, twittens, and strategic routes, such as the National Cycle Network 2.

Protection, enhancement and new provision

7.143 PRoWs offer a crucial, safe form of active travel away from roads, promoting physical activity and providing essential access to the countryside. Therefore, development must avoid harming these networks. Where a development includes or borders a PRoW, it must be sensitively integrated. The Council expects PRoWs to remain distinct, green corridors; simply absorbing a rural footpath into a standard paved pavement alongside a new estate road is not an acceptable design approach.

7.144 The Council supports the creation of new PRoW, such as upgrading bridleways to multi-user greenways suitable for active travel through walking, wheeling, cycling, and horse riding, especially where they close gaps in the existing network.

7.145 In practice, an improvement to any network being impacted is expected. Where development is adjacent to a PRoW, the Council would expect that access is provided to this network to enable the users of the new development to access the PRoW and utilise its benefits. East Sussex County Council will be consulted on relevant planning applications affecting PRoW.

7.146 To ensure that enhancements and new routes are targeted effectively, applicants should consult the latest Local Cycling and Walking Infrastructure Plan (LCWIP). The LCWIP serves as a key piece of evidence, identifying structural deficiencies, critical network gaps, and prioritised active travel corridors across the district. Proposals that align with or directly deliver the specific route improvements highlighted within the LCWIP will be supported, as this ensures developer contributions are directed to strategic, well-coordinated networks.

7.147 Where new routes are created or existing paths are upgraded, the physical design must ensure they are safe, resilient, and usable year-round without degrading the character of the landscape. To demonstrate that a new or enhanced route is "appropriately designed having regard to the built, natural, and historic setting", proposals must satisfy the following principles:

a. Surfacing and drainage: Surface choices should reflect the route's context and expected volume of multi-user traffic. All-weather, permeable surfacing should be used alongside integrated sustainable drainage solutions to prevent waterlogging, muddy tracking, and erosion.

b. Inclusive accessibility: Routes must prioritise step-free access to cater to users of all ages and abilities, including wheelchair users and pushchairs.

c. Sensitive lighting: While artificial lighting may be necessary to ensure personal safety along urban segments or routes connecting to key transport hubs, it must be avoided in open countryside and highly sensitive rural areas. Where lighting is fully justified, it must use low-lux, down-directed, and motion-activated systems to minimise light spill, strictly safeguarding local wildlife corridors and the dark sky environment of the High Weald National Landscape in accordance with Policy LAN3 (Light Pollution & Dark Skies).

7.148 Expanding access to the countryside must be balanced against the need to protect sensitive habitats from increased recreational pressure, which is specifically managed in the eastern part of the district through Policy ENV11 (Sustainable Access & Recreation Management Strategy).

Alterations, historic routeways, and the HWNL

7.149 The Council will not support the loss of or harm to a PRoW. While it is acknowledged that under some circumstances, the diversion or alteration of an existing route is necessary to enable development, this must not result in a downgraded user experience. Any diverted route must be enhanced, providing at minimum a more accessible, safer, or more scenic journey. East Sussex County Council will be consulted on all applications seeking to alter a PRoW.

7.150 Particular care must be taken regarding historic routeways. Many PRoWs in Rother trace ancient paths, drovers' roads, or sunken lanes that hold significant heritage value. Where a PRoW is identified as a historic routeway, its historic alignment and character must be respected. Furthermore, where diversions are proposed within the High Weald NL, the new route must be designed to conserve and enhance the area's statutory landscape protections.

7.151 It is important to emphasise that this policy does not apply to any private or permissive rights of way, as these are in private ownership and can be withdrawn by the landowner at any time. As such, it is not appropriate for the Council to formalise or protect them through this policy.

Policy ENV16: Combe Valley Countryside Park

Status	Strategic
Priorities	Live Well Locally, Green to the Core
Strategic Objectives	3, 4

1. Land between Bexhill and St. Leonards, from Galley Hill and the coast in the south to Crowhurst to the north, as shown on the Policies Map, is allocated as the Combe Valley Countryside Park (CVCP).

2. Within the CVCP, development proposals will only be supported where they:

    a. Are of a scale, form and design that preserves the landscape character of the Park and demonstrably align with the objectives set out in the published Strategy for the Combe Valley Countryside Park; and comply with Policy SS3 (Strategic Green Gaps).

    b. Support and enhance the usage of the Park as a key open space for Bexhill and Hastings and their wider catchment; and

    c. Provide for the conservation and, where appropriate, management of the land-based and marine designations within it.

Key evidence and or guidance:

- Strategy for the Combe Valley Countryside Park
- Rother Blue and Green Infrastructure Study (2026)

7.152 The NPPF expects planning policies to protect and enhance the natural and local environment and to ensure access to a network of high-quality open spaces to promote health and well-being. In addition, the PPG supports the strategic planning of GBI to deliver multi-functional benefits. This policy formally allocates and protects the Combe Valley Countryside Park (CVCP) to fulfil these national objectives and local priorities (Live Well Locally and Green to the Core), securing a critical piece of strategic GBI for the district.

7.153 The CVCP acts, in part, as a strategic gap between Hastings/St Leonards and Bexhill. It covers an area of approximately 600 hectares which provides access to the countryside and facilitates a range of appropriate recreational activities, while balancing the need to proactively manage wildlife habitats. By safeguarding this space, the policy directly addresses the deficiency in green space for the towns of Hastings and Bexhill.

Management strategy and scale of development

7.154 The Park was jointly established by RDC, HBC and ESCC. In 2015, a Community Interest Company (CIC) was formed with a board of directors including representatives of the three councils, local businesses, landowners and stakeholders, including the Friends of Combe Valley Foundation (a group which was established by local residents). The CIC sets out the long-term vision for the area through the Strategy for the Countryside Park.

7.155 To protect the area's fundamental character, general development within the CVCP will be strictly controlled. Development must be intrinsically linked to the park's recreational or environmental function (such as essential visitor facilities or conservation infrastructure) and demonstrably deliver the objectives of the CIC's Strategy.

7.156 There are many designated and protected sites within the Countryside Park, covering areas such as biodiversity and archaeology. These cover both the terrestrial and marine environments and due regard must be had to them when determining proposals.

Conservation and relieving recreational pressure

7.157 As the CVCP has become established, it has helped take some of the pressure off the other sensitive leisure destinations in the area and has specifically helped to manage the recreational pressure on more sensitive habitats, most notably the international Habitat Site designations to the south-east and south-west of the district. Maintaining the high quality and usability of the CVCP is therefore essential to facilitate a shift in recreational demand away from highly vulnerable ecological areas.

Adjacent uses

7.158 The Park sits within a complex landscape that encompasses or borders Pebsham Rural Business Centre, Hastings Household Waste Recycling Centre and a Southern Water Wastewater Treatment Centre. While the former land-raise operation for waste management has long ceased, there is continued use of land within the locality for waste collection, in line with the waste planning authorities' Waste and Minerals Plan. It is important that such operations are contained and do not conflict with the aims and objectives of the Countryside Park.

Pebsham Landfill Site

7.159 There may be an opportunity to use land at the former Pebsham Landfill site for the development of a stand-alone ground mounted solar installation ("a solar farm"). While this land is within the boundary of the CVCP it will not become safe or available for public access for many years, due to the nature of the landfill and the need for it to settle and release gas. However, while it is in this condition it could potentially be suitable for solar development, which itself would have a limited lifespan, and this is allowed for through Policy GTC6 (Renewable & Low-carbon Energy). Due to the current unsuitability of this land for other uses and the temporary nature of a solar farm, this potential use is not considered to conflict with the longer-term allocation of this land as part of the CVCP.

Heritage

Policy HER1: Conservation of the Historic Environment

Status	Strategic
Priorities	Live Well Locally, Green to the Core, Thriving Local Economy
Strategic Objectives	3, 4

1. Development proposals which conserve and enhance the historic environment, including through the safeguarding of heritage assets and their settings will be supported.

2. The benefits arising from the conservation and protection of heritage assets most at risk through neglect, decay or other threats will be given significant weight in the assessment of development proposals affecting them.

3. Development proposals affecting the historic environment, including designated and non-designated heritage assets and their settings, must:

    a. Consider and reinforce the historic significance and special character of the district's settlements, buildings and features through siting, scale, form and design, so that the effect of development on these characteristics can be taken into account in determining the application;

b. Take opportunities to improve areas of poor visual character or with poor townscape qualities;

c. Be based on a sound and thorough understanding of the significance of the heritage asset and its setting, including in terms of its history, layout, use, local relevance, fabric and archaeology, and demonstrate how this understanding has informed the design of the proposal;

d. Preserve, and ensure clear legibility of, locally distinctive vernacular building forms and their settings, features, fabric and materials, including forms specific to historic building typologies;

e. Refer to the character analysis in Conservation Area Appraisals, where relevant;

f. In areas of archaeological potential, include appropriate archaeological assessment of both above and below-ground archaeology to determine their significance and the potential for harm during development and its avoidance or mitigation;

g. Follow best practice guidance from Historic England regarding alterations to improve energy efficiency, to ensure that energy conservation measures or micro-generation installations do not damage the special character or significance of heritage assets or compromise their performance.

4. Regard should be had to the conservation of historic public realm features as non-designated heritage assets, which cumulatively contribute to the landscape and townscape character particularly within the High Weald National Landscape.

Key evidence and/or guidance:

- ESCC Historic Environment Record
- Rother Conservation Area Appraisals
- Historic England Heritage at Risk Register
- High Weald AONB Management Plan 2024-2029
- Rother Public Realm Strategic Framework (2020)

7.160 National planning policy requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment.

Heritage assets in Rother district

7.161 Rother district has a rich heritage 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 planned medieval town of Winchelsea, and a host of picturesque villages and hamlets. The historic built environment has a high level of statutory protection; designated heritage assets include approximately 2,200 Listed Buildings, 10 Conservation Areas, a number of Scheduled Ancient Monuments and Registered Parks and Gardens, and the 'Historic Battlefield' at Battle. Many other non-designated heritage assets contribute positively to the physical, historic and socio-cultural character of the district.

7.162 The historic built environment underpins the distinctive character of the district; through the pattern, form, and appearance of settlements and individual buildings, and the materials of their construction. These contribute to the unique sense of place, cultural identity and local distinctiveness of both the district as a whole, and of each settlement. The landscape setting of individual towns and villages varies from the linear form most usually associated with ridge-top development, to the less common valley setting associated with river crossings. Particularly distinct settlements are the nucleated hill-top setting of the ancient town of Rye, and the formalised medieval grid plan of Winchelsea. Historic farmsteads with farm building typologies representing locally distinctive historic agricultural practices, are prolific within the rural landscape.

7.163 Locally distinctive building typologies and features include long sweeping catslide roofs, oast houses, timber-framed barns and other agricultural buildings associated with local historic farming practices, and medieval Wealden Hall Houses, found either as rural farmhouses, or incorporated into the fabric of villages and towns, and often much disguised through later alterations.

7.164 Historic buildings in the district generally deploy a limited palette of materials associated with the local High Weald geology, namely timber-framing, clay tiles (for roofs and wall hanging) and brickwork. In specific pockets to the east of the district, white-painted weatherboarding is prolific, and to the west of the district are distinctive groups of buildings constructed from the local Brightling sandstone. These materials, if properly looked after, are inherently sustainable as they are local, durable, resist wear and decay and can be repaired or replaced. Meanwhile, the coastal resort town of Bexhill-on-Sea has a rich heritage of late Victorian and Edwardian villa architecture, imposing in scale and ornate in detailing, which plays an important role in defining the local character and street scene.

7.165 The High Weald AONB Management Plan is a statutory document that sets out defining settlement characteristics of the High Weald, which are to be conserved and enhanced in development proposals. The role of the historic environment in the High Weald National Landscape must be considered in all relevant applications within the HWNL and its setting.

7.166 Historic England's Heritage at Risk Register includes several sites in Rother. There may also be other designated and non-designated assets at risk through, for example, neglect, decay or erosion. Proposals which sustain and enhance such assets will be positively considered in accordance with national planning policy and other Plan policies.

Understanding significance

7.167 Planning applications affecting heritage assets will be required to be accompanied by information describing their significance (including that of the setting). It is particularly important that proposals for the conversion of historic buildings are based on a sound and thorough understanding of the building's significance, including in terms of its history, layout, use, local relevance, fabric and archaeology, this is further covered through Policy HER2. A Heritage Statement will be required for all proposals affecting a designated or non-designated heritage asset.

Archaeology

7.168 Rother contains many Archaeological Notification Areas (ANAs), which are areas containing recorded archaeological remains. Other sites outside ANAs may also contain above or below ground archaeology. In any area of archaeological potential (including ANAs), developers will be required to undertake an assessment to determine the significance of any remains and the potential for harm during development. Options for avoidance or mitigation of harm will be required to be considered.

7.169 In addition, any proposal affecting a Scheduled Ancient Monument, and all proposals involving major development will require a desk-based heritage impact assessment. This will include information from the East Sussex Historic Environment Record (HER). The HER database maps and describes the county's known archaeological and historic sites and features. It holds information on a range of sites and features dating from the Palaeolithic period (c.800,000 years ago) up to 20th Century monuments.

Sustainable historic buildings

7.170 "The greenest building is the one that already exists"[161]. The historic buildings of Rother have an important role to play in realising the Local Plan's Green to the Core priority. Sustainability in building is not just associated with operational energy consumption, but also the embodied energy used in their construction. Research carried out by Historic England has found that sympathetically upgrading and reusing existing buildings can dramatically improve a building's energy efficiency and make substantial energy savings compared to demolition. However, in accordance with Historic England guidance, a reduction in operational carbon emissions will not in itself justify development where it would cause harm to the heritage asset.

7.171 Older buildings have survived because of their durability and adaptability. Continuing to adapt, upgrade, repair and maintain them so they remain useful and viable makes good social, economic and environmental sense. Generally speaking, improving the energy efficiency of historic buildings and those of traditional construction means reducing heat losses wherever possible without damaging their special character or compromising their performance.

7.172 Historic England advocate, and provide detailed guidance on, a holistic 'whole building approach'[162], which aims to meet the combined objectives of increasing energy efficiency and sustaining significance in heritage assets, while avoiding unintended consequences. This approach can help in understanding where energy goes and identifying less harmful options to achieve energy savings.

7.173 Low and zero carbon (LZC) technologies, i.e. microgeneration equipment which generates energy from renewable or low carbon sources and emit low or no carbon dioxide emissions, such as Photovoltaics, Solar Water Heating, Heat Pumps, Wind and Turbines, can also be a part of the equation in reducing a building's carbon footprint. Again, Historic England has produced guidance on a range of LZC technologies and historic buildings. In considering LZC technologies in the historic environment, consideration will need to be given to whether the particular installation would suit the particular building, whether the system can be fitted with no significant adverse impact on the building and its historic fabric, and what the visual impact on the setting of the building or heritage asset would be.

The public realm

[161] Carl Elefante, former president of the American Institute of Architects.
[162] Energy Efficiency and Retrofit in Historic Buildings | Historic England

7.174 Rother district is fortunate to possess a variety of historic public realm features and surface treatments, including the Listed cobbled streets of Rye, brick paving in Winchelsea and Robertsbridge, and raised pavements in Battle. These are important in defining the special character and local distinctiveness of individual settlements. The retention and sensitive repair and, where appropriate, reinstatement of such features is important in maintaining such character. Rye Conservation Society has produced specific guidance for those carrying out repairs to the town's historic cobbled streets.

7.175 The historic public realm is also important in defining local character and sense of place in the rural areas. The historic public realm across the High Weald is identified in the AONB Management Plan as playing an important role in defining the rural landscape character of the NL. Historic features such as milestones, historic fingerpost signs and red telephone kiosks and letterboxes contribute positively to the character of the rural public realm. This is highlighted in the adopted Rother District Public Realm Strategic Framework[163], which, though district-wide, contains specific references to designated Conservation Areas within the district, and much of the content refers to heritage features in the public realm. Historic England has also produced guidance on highway and public realm works in historic places[164].

Policy HER2: Conversion & Re-use of Historic Buildings

Status	Non-strategic
Priorities	Green to the Core, Live Well Locally
Strategic Objectives	3, 4

1. Historic buildings will be retained in effective and appropriate use.

2. Development proposals for the reuse and/or subsequent alteration of historic buildings should:

    a. Take a hierarchical approach for re-use as follows:

        i. The priority is for the building to remain in its traditional use or a use closely related to that use. For traditional farm buildings the

[163] Public Realm Strategic Framework – Rother District Council
[164] Streets for All - Advice for Highway and Public Realm Works in Historic Places | Historic England

priority is to remain in farm-associated use, or farm-related business purposes;

ii. Where there is a demonstrable lack of need for such uses, consideration will be given to alternative economic uses, including workshops and office use or tourism uses;

iii. Where such uses are not suitable, due to adverse impacts on amenity or rural landscape character, or not achievable due to viability, then residential use may be considered acceptable;

b. In accordance with Policy HER1 (Conservation of the Historic Environment), be based on a sound and thorough understanding of the significance of the building and its setting, including in terms of its history, layout, use, local relevance, fabric and archaeology, and demonstrate how this understanding has informed the design of the proposal;

c. Ensure retention of the building's legibility, form (as an example of a specific building typology), historic fabric and setting, and, through design, maintain the traditional character and the contribution the building and its surroundings make to the wider landscape and countryside or townscape character;

d. Follow best practice guidance, particularly that published by Historic England[165];

e. Secure net gains for biodiversity in accordance with Policy ENV7 (Biodiversity) including through the protection of existing wildlife habitats, and their enhancement, by incorporating or retaining features which support priority or threatened species likely to be found at the location.

Key evidence and/or guidance:

- ESCC Historic Environment Record
- Rother Conservation Area Appraisals
- Historic England, Adapting Traditional Farm Buildings – Best Practice for Adaptive Reuse (2017)
- Historic England Advice Note 2: Making Changes to Heritage Assets (2017)

[165] For example, 'Adapting Traditional Farm Buildings – Best Practice Guidance for Adaptive Reuse' (2017); Historic England Advice Note 2: Making Changes to Heritage Assets; Historic Environment Good Practice Advice in Planning: The Setting of Heritage Assets.

7.176 National planning policy requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment, which takes into account matters including the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation.

7.177 In addition to Policy HER1 which is the over-arching heritage policy, this policy sets out additional detail and considerations for proposals involving the conversion, alteration and reuse of historic buildings. Proposals in Rother commonly involve traditional historic farm buildings, however the policy also relates to other types of historic building.

Historic farm buildings

7.178 Rother's countryside has a highly distinctive and important architectural character by way of settlement pattern and building typologies. The historic hamlets and farmsteads of the High Weald create a distinct and picturesque landscape, with the rolling pastureland and small ancient woodlands of the countryside interspersed with the rich clay-tiled roofs of medieval houses, barns and oasts. Building typologies reflect locally distinct historic agricultural practices, for example the distinctive brick roundels of the hop industry's oast-houses, fine timber-framed barns and modest brick cowsheds and outbuildings.

7.179 Traditional historic farm buildings are a vital element in defining the distinctive character of the district's countryside, as well as being a valuable economic resource. They have cultural and archaeological value, not just in their fabric, but also their location and setting, to help our understanding of the historical development of farming in the district. Traditional historic farm buildings are generally considered to be those dating from pre-1880, though there may be other pre-war buildings, either late Victorian or Edwardian that are of interest in a farmstead or landscape context and may be worthy of retention.

7.180 Historic England has analysed the character of rural settlement and farming throughout England, including in the High Weald, within which the majority of the district's countryside falls, in their Farmstead and Landscape Character Statements.[166.] This highlights the historic small farm sizes, leading to small 'farmsteads' of mostly dispersed cluster plans or loose courtyards, and typically consisting of just the farmhouse, one large multi-purpose barn, and perhaps an oasthouse or a small open-fronted outbuilding[167]. These characteristics are also recognised in the High Weald AONB Management Plan,

[166] Farmstead and Landscape Statement: High Weald National Character Area 122 (Historic England, 2020)
[167] Further research available in 'Farm Buildings of the Weald 1450-1750' David and Barbara Martin Heritage Marketing & Publications Ltd 2006.

together with the need to protect and preserve the character and setting of historic traditional buildings and built features distinct to the High Weald.

Other historic buildings

7.181 Examples of other non-residential historic buildings found in Rother sometimes proposed for conversion and change of use include former churches, former village schools, water pumping stations and former military buildings. These may be found in both rural and urban settings. Where such buildings are currently or were last in community or employment use, proposals for a change of use would also need to comply with the requirements of Policy ECO4 (Retention of Sites of Economic or Community Value).

Conversion for re-use

7.182 In accordance with Historic England guidance[168], the priority uses for traditional agricultural buildings are to retain such buildings in continued farming related uses, and secondly to convert for employment uses, including tourism. Where such conversions are not suitable for the particular nature or location of the buildings, or where the applicant has demonstrated that employment or tourism uses are not viable, residential conversions will be considered. In such circumstances, the applicant should demonstrate that every attempt has been made to secure an employment or tourism re-use first.

7.183 Similarly, the priority uses for other non-residential historic buildings currently or last in community or employment use are to retain those uses, due to their need in the district, and only where such uses are demonstrated not to be viable or practicable in accordance with Policy ECO4, will residential conversion be considered. Note that Policy ECO4 does not apply to buildings currently or last in agricultural use. Changes of use from other uses will be considered in line with relevant policies of the Plan.

7.184 Different uses of a historic building will inevitably have different physical impacts on the building, its setting and legibility; this is also reflected in the hierarchical approach to conversion uses described above. Continued farm use of agricultural buildings, or in use as a workshop or for light industrial activities, are likely to require only limited alterations to building fabric and to the setting of buildings. In contrast, residential use usually brings greater pressure for internal subdivision of spaces, new openings, curtilage division and

[168] Including: Living Buildings in a Living Landscape: finding a future for traditional Farm Buildings (Historic England, 2006); The Adaptive Reuse of Traditional Farm Buildings: Historic England Advice Note 9 (2017), Adapting Traditional Farm Buildings: best practice guidelines for adaptive reuse (Historic England, 2017)

domestication which can greatly impact on the significance of these farm buildings and their appearance in the landscape.

7.185 It is important that in any conversion or re-use proposal, the distinctive character of the building; their farmstead and/or wider landscape or townscape setting, external appearance, internal character and features, be retained. Domestication of the building or its setting by means of inappropriate alterations, new development, access arrangements or boundary treatments should be avoided.

7.186 Specific advice in this respect for farm buildings is given in the Historic England publication 'Adapting Traditional Farm Buildings – Best Practice for Adaptive Reuse' (2017) and this should be interpreted alongside the specific advice given in the Farmstead Character Statement with regard to local building typologies and features. Of particular importance at a local level is maintaining the internal spatial qualities of timber framed barns, the elevational character of their cart-bay entrances, and the uninterrupted brick walling of oasthouse roundels.

7.187 Specific advice for other types of historic buildings include Historic England Advice Note 2: Making Changes to Heritage Assets and Historic Environment Good Practice Advice in Planning 3: The Setting of Heritage Assets.

Protecting and enhancing biodiversity

7.188 Historic buildings, particularly those in rural locations, can often be important habitats for wildlife including protected species such as bats, barn owls and other nesting birds. The Historic England document 'Adapting Traditional Farm Buildings – Best Practice for Adaptive Reuse' (2017) gives advice on wildlife legislation in this respect. It recommends that an ecological survey should be carried out at project feasibility stage to establish whether there are protected species present. Enhancements to habitats, such as through the provision of nest boxes, sensitive eave and roof design, retention of rough surfaces and use of small openings typical of farm buildings, should be included as part of any development. Where possible, the creation of adjacent supporting habitat for the relevant species could also be helpful.

7.189 The East Sussex and Brighton & Hove Local Nature Recovery Strategy identifies a need to provide nesting and roosting boxes or other features to support bats, birds, insects and reptiles in the farmed environment. For birds, rather than providing general bird boxes, the LNRS recommends for both rural and urban locations, the provision of

specific types of boxes suited to threatened bird species found at the location (e.g. swift, house sparrow, starling, owl species, etc) and in locations where over-wintering habitat and summer insect-rich forage is present. Swift bricks are considered a universal fix for small cavity-nesting bird species as they will also be used by house sparrows, starlings, great tits, blue tits and occasionally house martins and nuthatches.

Alterations to converted historic buildings

7.190 Historic buildings that have already been converted are also vulnerable to inappropriate alteration or development, for example extensions, new openings, garages, sheds and other outbuildings, boundary treatments and hard surfacing, that would have an adverse impact on the intrinsic character of the building itself, or on its setting. For example, even a well-designed extension will usually undermine the form of a barn or oasthouse as an example of a particular building typology.

Policy HER3: Shopfronts, Signage & Advertising

Status	Non-strategic
Priorities	Live Well Locally
Strategic Objectives	3

1. Development proposals for a new shopfront, an alteration to existing shopfront (including external blinds), or signage on buildings, will only be permitted where they:

    a. Relate appropriately, in size and design to the architectural and historic character and appearance of the building in which the shopfront is located;

    b. Relate appropriately, in size and design, to its overall setting in the street scene, and impact on public safety; and

    c. Have due regard to its proportions, size, design, visual relationship to upper storeys, materials, colour, height and width, and illumination.

2. Particularly within Conservation Areas, the loss of features or fabric of historic, architectural and/or socio-cultural merit or the installation of external roller shutters will not normally be acceptable.

3. Signage and advertisements on or in the grounds of commercial properties will be permitted where their number, size, shape, materials, location and design (including any lighting and illumination) have an acceptable impact

on highway safety and amenity, including on the scenic, architectural and historic character of the locality.

4. Other than in exceptional circumstances, free-standing signage and advertisements should have a close physical relationship to the premises that they serve.

5. In rural areas, signage and advertisements should not detract from landscape character or the undeveloped nature of the countryside, including after dark, nor introduce unnecessary "clutter".

Key evidence and/or guidance:

- ESCC Historic Environment Record
- Rother Conservation Area Appraisals
- Bexhill–On–Sea Town Centre Conservation Area: Shopfronts and Signage Guidance (2006)

7.191 National planning policy promotes high-quality design for all types of development, recognising that the quality and character of places can be harmed by the poor placement and design of advertisements.

7.192 Shopfronts[169], signage and advertisements form an integral part of commercial streets and of town and village centres in the district. They play an important role in helping to create an attractive retail environment and, as such, contribute to economic vitality.

7.193 While advertising and signage generally convey important information and are valuable in promoting business activities, they can have a significant impact on the appearance of buildings and areas. Unduly prominent, prolific or poorly designed signage can detract from the character of a building, the townscape or village street scene or of the countryside within which it is located. Furthermore, if uncontrolled, it can lead to roadside clutter and distract drivers.

7.194 In order to protect the amenities of an area, it is important that all signs and advertisements, whether on a building or freestanding, are carefully designed and of an appropriate scale, detail, materials and colours.

Shopfronts

[169] The term "shopfront" is taken to mean the built frontage of a variety of commercial premises, including shops, financial and professional services, restaurants/cafes, drinking establishments and hot food takeaways.

7.195 Traditional shopfronts, such as the late Victorian/early Edwardian ones found in the planned shopping streets of Bexhill-on-Sea or those inserted into the medieval buildings of the market towns of Battle and Rye, are important because they provide active frontages and make a positive contribution to the character and appearance of those historic centres. Without careful attention though, it is easy to gradually erode the character of traditional shopfronts and historic street-frontages and to lose or obscure important building features.

7.196 Where shops or other commercial premises lie within Conservation Areas or other areas of historic character, it is particularly vital that shopfronts, signage and advertisements are well designed, detailed and relate positively to their surroundings. There should be a general presumption to retain and restore the original fabric and detailing of historic shopfronts, such as stallrisers, cornices and pilasters, windows and decorative tiling. More generally, any new shopfront should relate well to the building and to its overall setting in the street scene, in terms of its proportions, design, relationship to upper storeys, fascia height and width, mullion treatment, materials and colour. Most common issues relate to the introduction of inappropriately deep or stuck-on fascias and internally illuminated signage. Fascia signs are the most common form of advertisement on a building and should be designed to appear as an integral part of it in terms of their positioning, height, size, design and materials.

7.197 Canopies and blinds may be successfully integrated into a traditional shopfront if carefully detailed and not unduly dominant. However, the use of modern materials such as acrylic sheeting, Perspex, aluminium or plastic, is rarely appropriate for traditional shopfronts on historic buildings in a Conservation Area. There is particular concern around the introduction of solid external roller shutters, which can have a "deadening", inhospitable effect on the street scene. Where security measures are essential, alternatives such as the use of an internal lattice shutter or laminated glass represent more sensitive approaches.

7.198 The Council has adopted specific guidance for shopfronts and signage within Bexhill-on-Sea Town Centre Conservation Area[170], in recognition of the special architectural character of the shopping terraces that were constructed within a very short period of time at the end of the 19th century and beginning of the 20th century.

Advertisements

[170] Bexhill–On–Sea Town Centre Conservation Area: Shopfronts and Signage Guidance (2006)

7.199 The illumination of all signs and advertisements needs sensitive consideration and to be restrained in their quantity and brightness. Within the town centres of Bexhill, Battle and Rye, some night-time illumination of shops and other commercial premises helps to promote a vibrant and safe evening economy. Elsewhere, the illumination of signs on buildings, including hanging signs, is normally only justified where it relates to late opening premises such as a public house, restaurant, chemist or similar. At the same time, consideration must be given to the amenity of residential properties. Modern projecting, usually illuminated box signs, can be particularly cluttering and discordant features on shopfronts and in the street scene and are very unlikely to be appropriate within Conservation Areas.

7.200 In rural areas, the amount and siting of advertisements, especially illuminated signage, need to be strictly controlled, in the interests of maintaining the generally undeveloped landscape character and amenities of the countryside, preventing "clutter", maintaining highway safety and dark skies. Hence, unless there are exceptional circumstances which justify an alternative approach, any advertisement should be limited to a location close to the premises it serves and be sited and sized so as to not undermine the local and countryside character. The cumulative impact of advertisements on the character of rural areas will also be a consideration.

Policy HER4: Doors, Windows & Roofscapes in Conservation Areas & Listed Buildings

Status	Non-strategic
Priorities	Live Well Locally
Strategic Objectives	3, 4

1. For listed buildings and unlisted buildings in Conservation Areas, the Council will support proposals that preserve or enhance historic character, appearance and significance, and that respect traditional form, detailing, materials and local context and distinctiveness.

2. Particular regard will be had to Rother's varied historic character, including Bexhill's Victorian and Edwardian seaside townscape, the historic market towns of Rye and Battle, Winchelsea's planned form, and the rural vernacular of High Weald villages, hamlets and farmsteads.

3. Where proposals affect a listed building, its special architectural or historic interest must be preserved. This applies to the building as a whole, including its fabric, form, detailing, plan form, setting and later phases of

alteration, regardless of whether the affected elevation, roof slope or feature is visible from the public realm.

4. Alterations to doors, windows and roofs will be supported where they are informed by the building's significance and preserve its special interest. Repair should normally be preferred to replacement. Where replacement is justified, it should match the historic or traditional form, material, profile, finish, glazing pattern, opening method, construction and detailing. Where evidence exists, replacement windows should replicate as closely as practicable the original fenestration fitted to the building, including the arrangement of panes, glazing bars, frame proportions, opening method and relationship to the surrounding opening, unless an alternative approach would better reveal or sustain significance.

5. For unlisted buildings in Conservation Areas, proposals will be assessed according to the contribution made by the building, elevation, roof slope or feature to the area's character and appearance. On elevations and roof slopes visible from the public realm, including streets, lanes, footpaths, open spaces, the coast and wider landscape views, replacement windows, doors and roof coverings will be expected to closely reflect the traditional or established historic form, proportions, materials, profiles, finishes, opening method and detailing of the original or characteristic features.

6. Where evidence exists, proposals should replicate closely the original fenestration fitted to the building. Greater flexibility may be appropriate on rear, secondary or concealed elevations of unlisted buildings, provided the works remain sympathetic and do not harm the building's integrity, group value or the character or appearance of the conservation area.

7. The original fenestration includes the arrangement of panes, glazing bars, frame proportions, opening method and relationship to the surrounding opening. Traditional or sympathetic materials and detailing will be supported where they preserve the special interest of a listed building or the character or appearance of a Conservation Area. Slim-profile double glazing, secondary glazing and other thermal improvements will be acceptable where they preserve traditional proportions and detailing and do not harm listed building significance or Conservation Area character.

8. Replacement roof coverings will be supported where they closely match the original or traditional material, colour, texture, profile, gauge, coursing and fixing method. Particular regard will be given to locally characteristic materials, including natural slate, handmade or traditional clay tiles, and roofing treatments that contribute positively to Rother's historic towns, villages, rural buildings and coastal settlements.

9. Alternative roofing materials may be acceptable on unlisted buildings where the material preserves the building and the Conservation Area. For listed buildings, alternative materials will only be acceptable where they preserve the building's special architectural or historic interest, regardless of visibility.

10. Proposals should positively respond to local character and heritage significance, including through appropriate treatment of rooflights, openings, chimneys, eaves, verges, materials and joinery details. Reinstatement of historically appropriate forms and detailing will be encouraged where it would enhance the listed building or Conservation Area.

Key evidence and/or guidance:

- ESCC Historic Environment Record
- Rother Conservation Area Appraisals

7.201 There are circumstances where planning permission is required to change the doors, windows or roof covering of a listed building or a property in a Conservation Area. The Council receives many applications that involve such proposals. Original timber sliding sash and casement windows, and timber panel doors can contribute greatly to the character and appearance of buildings within a conservation area and so enhance its overall significance. There are many ways in which windows can be improved to achieve better performance. However, sometimes these elements reach the end of their useful life and require replacement. Under these circumstances, the Council will encourage the choice of replacement doors, windows or roof materials that retain the original character of the building.

7.202 It is appreciated that energy efficiency is a key concern of householders, including those living within listed buildings, and unlisted buildings in conservation areas. Policy GTC2 (Net Zero Retrofitting) supports proposals which result in considerable improvements to the energy efficiency and reduction of carbon emissions of existing buildings, highlighting the need for development affecting historic buildings or buildings within Conservation Areas to be guided by Historic England advice on climate change and historic building adaptation. In their guidance "Modifying Historic Windows as Part of Retrofitting Energy Saving Measures" (2024) and "Traditional Windows: their care, repair and upgrading" (2017), Historic England sets out five principles for making changes to windows in listed buildings, which they confirm also apply to unlisted buildings in conservation areas. These include: (1) Where historic windows make a positive contribution to the significance of a listed building, they should be retained and repaired where possible. If beyond repair, they

should be replaced with accurate copies. (4) Where historic windows have been replaced with ones whose design does not follow historic patterns, these are unlikely to contribute to the significance of listed buildings. Replacing such windows with new windows of a sympathetic historic pattern, whether single glazed or incorporating slim-profile double glazing, may cause no additional harm. It also provides an opportunity to enhance the significance of the building, which is the desired outcome under national policy.

7.203 Other specific advice from Historic England for windows, doors and roofs includes: Adapting Historic Buildings for Energy and Carbon Efficiency: Historic England Advice Note 18; Listed Building Consent: Historic England Advice Note 16; The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3; Traditional Windows: Their Care, Repair and Upgrading; and Making Changes to Heritage Assets: Historic England Advice Note 2.

Chapter 8: Monitoring Framework

Local Plan Objective	Relevant Policies	Indicators
1: Mitigate and adapt to climate change, including by delivering net zero carbon ambitions, reducing flood risk from all sources and promoting the multifunctional benefits of green blue infrastructure through effective and supportive planning policies.	ECO7, GTC1, GTC2, GTC3, GTC6, DEV2, LWL1, LWL5, LWL6, LWL7, LWL8, ENV1, ENV2, ENV3, ENV4, ENV5, ENV6, ENV7, ENV12, ENV13.	1: Number of permissions granted contrary to the advice of the Local Lead Flood Authority (LLFA) on flood defence grounds (fluvial & tidal). 2: Number of permissions granted contrary to the advice of the LLFA on Sustainable Urban Drainage Systems (SuDS). 3: Percentage of permissions for residential development meeting the required water consumption standard set out in Policy GTC4: Water Efficiency for previous monitoring year. 4: District-wide CO2 emissions trends. 5: Number of dwellings permitted in the Coastal Change Management Area (CCMA) for previous monitoring year (net). 6. Percentage of permitted and completed developments meeting the required energy standards in Policy GTC1: Net Zero Development for previous monitoring year.
2: Respond to the housing crisis and help facilitate the delivery of housing to meet the needs of different groups in the community, ensuring a variety of high-quality sustainable, zero carbon ready dwellings that meet the needs and address the income levels of Rother's wider population for their lifetime.	SS1, SS4, SS6, HOU1, HOU6, HOU7, HOU8, HOU9, HOU11, HOU13, HOU15, HOU16, GTC1, GTC3, DEV1, DEV2, LWL1.	7: Number of dwellings permitted and completed for previous monitoring year (net). 8: Number of dwellings on windfall sites permitted and completed for previous monitoring year (net). 9: Number of affordable dwellings permitted and completed for previous monitoring year (net).

Local Plan Objective	Relevant Policies	Indicators
		10: Percentage of permitted and completed developments meeting the relevant targets in Policy HOU2: Affordable Housing, for previous monitoring year (net). 11: Five-year housing land position. 12: Housing register waiting list. 13: Housing Delivery Test position.
3: Maximise opportunities for nature conservation, recovery and biodiversity net gain, protect sensitive habitats and conserve and enhance the natural beauty and historic landscape character of the High Weald National Landscape, while allowing for sensitive development that allows communities to thrive. Promote and secure environmental protection, including by seeking to improve water quality.	SS3, SS4, HOU9, HOU11, HOU17, ECO11, GTC6, DEV2, LWL1, LWL5, LWL6, LWL7, LWL8, LAN1, LAN4, ENV1, ENV2, ENV3, ENV4, ENV5, ENV6, ENV7, ENV11, ENV12, ENV13, ENV15, ENV16, HER1, HER2	14: Support of Policy LAN1: Landscape Character & Stewardship and LAN2: High Weald National Landscape at appeal. 15: Condition and size of internationally and nationally important wildlife and geological sites. 16: Percentage of relevant permissions achieving 20% BNG on-site. 17: Percentage of relevant permissions with off-site planning obligations for BNG. 18: Changes in ecological status of water bodies.
4: Promote high quality, inclusive design and protect and enhance the significance of Rother's built and natural heritage, including its setting, while providing opportunities for recreation and tourism.	SS3, SS4, HOU15, HOU16, HOU17, ECO1, ECO6, ECO7, ECO8, ECO10, ECO11, GTC2, LWL5, LWL6, LAN1, ENV11, ENV13, ENV14, ENV15, ENV16, HER1, HER2	19: Number of permissions granted for new and expanded visitor accommodation, attractions and facilities for previous monitoring year. 20: Number of assets on Heritage at Risk Register.
5: Deliver sustainable growth and regeneration in Bexhill and its edges, along with Hastings Fringes, with supporting	SS1, ECO1, ECO6	21: Number of dwellings permitted and completed in Bexhill for previous monitoring year (net).

Local Plan Objective	Relevant Policies	Indicators
infrastructure, contributing to the needs of the wider housing and economic market area.		22: Number of dwellings on windfall sites permitted in Bexhill and completed for previous monitoring year (net). 23: Number of affordable dwellings permitted and completed in Bexhill for previous monitoring year (net). 24: Percentage of permitted and completed developments meeting the relevant targets in Policy HOU2: Affordable Housing, in Bexhill for previous monitoring year (net). 25: Vacancy rates in Bexhill Town Centre. 26: Net gain or loss of employment floorspace permitted and completed in Bexhill for previous monitoring year.
6: Create economic prosperity, both in rural and urban locations, meeting the employment needs of the wider population and local businesses, improving the quality and variety of jobs, and being flexible to the changing needs of the economy.	SS1, SS4, ECO1, ECO2, ECO4, ECO5, ECO6, ECO7, ECO8, ECO10	27: Net loss/gain of employment floorspace completed for previous monitoring year (sqm). 28: Vacancy rates in Town and District Centres as defined in Policy ECO6: Supporting Town & Village Vitality.
7: Focus growth in sustainable locations across the district, or places that can be made sustainable, through the timely delivery of strategic and other supporting infrastructure and community facilities.	SS1, SS2, SS4, INF2, ECO2, ECO6, DEV2, LWL1, LWL2, LWL3, LWL8	29: Data from the Infrastructure Funding Statement (IFS) relating to Community Infrastructure Levy and S106 contributions.
8: Enhance the sustainability and connectivity of local communities through sustainable transport measures, including to support active travel, and improved internet network coverage.	INF2, HOU1, ECO1, ECO2, ECO10, LWL2, LWL3, LWL4, LWL7, LWL8, ENV14, ENV15	30: Number of permissions which have secured improvements or contributions to public transport for previous monitoring year. 31: Net increase/decrease in public rights of way.
9: Support and achieve safe, healthy, vibrant and mixed communities where the physical and mental health and well-being of residents is a high priority. Create high standards of inclusivity and accessibility to shared facilities for all the district's residents.	SS4, HOU1, HOU6, HOU7, HOU8, HOU13, ECO4, ECO5, ECO6, ECO7, DEV1, LWL2, LWL3, LWL4, LWL5, LWL6, LWL7,	32: Net loss/gain of community services and facilities floorspace for previous monitoring year (sqm). 33: Support of LAN4: Light Pollution & Dark Skies at appeal.

Local Plan Objective	Relevant Policies	Indicators
	LAN4, ENV7, ENV13, ENV14, ENV15	34: Percentage of relevant permissions which include a Health Impact Assessment (HIA) for previous monitoring year. 35: Trends in multiple deprivation index.
10: Balance strategic planning with the opportunities for local delivery through neighbourhood planning.	SS6	36: Report on progress of neighbourhood plans and parish priority statements.
11: Deliver sustainable development by making the optimal use of land, including by prioritising the use of brownfield land and ensuring all new development is designed and built to appropriate densities, having regard to local context and character.	SS2, ECO2, ECO5, ECO6, GTC3, GTC6, LWL1, LWL5, LWL6, LWL8	37: Average density of permitted residential developments of a) all allocated sites, and b) 10 or more units, per sub-area as set out in Policy LWL1: Efficient Use of Land & Appropriate Densities for previous monitoring year.

Appendix 1: List of Strategic Policies

Policy SS1: Spatial Strategy for Rother
Policy INF1: Strategic Infrastructure Requirements
Policy INF2: Transport Connectivity, Decarbonisation & Mitigation
Policy SS2: Development Boundaries
Policy SS3: Strategic Green Gaps
Policy SS4: Strategy for the Countryside
Policy SS5: Strategy for Accommodation Needs of Gypsies, Travellers and Travelling showpeople
Policy SS6: Neighbourhood Plans & Parish Priority Statements
Policy HOU1: Mixed & Balanced Communities
Policy HOU2: Affordable Housing
Policy HOU3: Rural Exception Sites & Community-led Development
Policy HOU4: Sub-division of Dwellings & Houses of Multiple Occupation (HMOs)
Policy HOU5: Residential Internal Space Standards
Policy HOU6: Access Standards
Policy HOU7: Specialist Housing for Older People
Policy HOU8: Residential Care & Nursing Homes
Policy HOU9: Gypsies, Travellers & Travelling Showpeople
Policy HOU10: Self-Build & Custom Housebuilding
Policy HOU11: New Dwellings in the Countryside
Policy HOU12: Dwellings for Rural Workers
Policy HOU13: External Residential Amenity Areas
Policy HOU14: Extensions to Residential Gardens in the Countryside
Policy HOU15: Residential Extensions, Alterations & Outbuildings
Policy HOU16: Annexes
Policy HOU17: Boundary Treatments & Means of Enclosure
Policy HOU18: Accesses & Drives
Policy ECO1: Supporting a Thriving Local Economy
Policy ECO2: New Employment Development
Policy ECO3: Safeguarding Employment Land & Premises
Policy ECO4: Retention of Sites of Economic or Community Value

Policy ECO6: Supporting Town & Village Vitality
Policy ECO7: Tourism Activities, Facilities & Accommodation
Policy ECO9: Agricultural Development & Forestry
Policy GTC1: Net Zero Development
Policy GTC2: Net Zero Retrofitting
Policy GTC3: Construction Materials and Waste
Policy GTC6: Renewable and Low Carbon Energy
Policy DEV1: General Development Considerations
Policy DEV2: Comprehensive Development & Masterplanning
Policy LWL1: Efficient Use of Land & Appropriate Densities
Policy LWL2: Facilities and Services for Residential Development
Policy LWL3: Active Travel, Public Transport Connections & Services Outside the Site
Policy LWL4: Active Travel & Public Transport Within Sites
Policy LWL5: Well-designed and Distinctive Places
Policy LWL6: Built Form
Policy LWL7: Streets and Public Realm for All
Policy LWL8: Multimodal Parking, Servicing and Deliveries
Policy HWB1: Health Impact Assessments
Policy HWB2: Managing Impacts on Community Wellbeing
Policy HWB3: Healthcare and Other Community Facilities and Services
Policy LAN1: Landscape Character & Stewardship
Policy LAN2: High Weald National Landscape
Policy LAN3: Trees, Woodlands and Hedgerows
Policy ENV1: Flood Risk Management
Policy ENV2: Protection of Water Quality & the Water Environment
Policy ENV6: Rother Coastal Change Management Area
Policy ENV7: Biodiversity
Policy ENV8: Habitats & Species
Policy ENV9: Local Nature Recovery Strategy
Policy ENV13: Green & Blue Infrastructure
Policy ENV16: Combe Valley Countryside Park
Policy HER1: Conservation of the Historic Environment

Appendix 2: Glossary

1066 Country Walk – the route commemorates 1066, the year of the Battle of Hastings, and seeks to link the places and the people of that important year. It runs through East Sussex from Pevensey to Rye, passing through Battle.

Accessibility – the ability of people of all ages and abilities to reach, enter, move around and use places, buildings, facilities and services safely and conveniently, including disabled people and people with mobility, sensory or cognitive impairments, older people and people with young children.

Active Travel – walking, wheeling and cycling and, where appropriate, horse riding. Wheeling includes the use of wheelchairs, mobility scooters and other mobility aids.

Active Frontage – a building frontage that provides overlooking, entrances, windows, activity or visual interest onto a street, route or public space and contributes to natural surveillance and street activity.

Affordable housing – housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

a) **Social Rent:** meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent; (b) the landlord is a registered provider; and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision.

b) **Other affordable housing for rent:** meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).

c) **Discounted market sales housing:** is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local

house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.

d) Other affordable routes to home ownership: is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low-cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.

See also **Intermediate Affordable Housing.**

Agricultural Diversification – a farm or forestry business broadening its business model to include economic activities other than agriculture, to provide a long-term sustainable income stream that supplements agricultural income and allows farming of the land to remain viable.

Ancient or Veteran Tree – a tree which, because of its age, size and condition, is of exceptional biodiversity, cultural or heritage value. All ancient trees are veteran trees. Not all veteran trees are old enough to be ancient but are old relative to other trees of the same species. Very few trees of any species reach the ancient life-stage.

Ancient Woodland – an area that has been wooded continuously since at least 1600 AD. It includes ancient semi-natural woodland (ASNW), plantations on ancient woodland sites (PAWS), ancient wood pasture and parkland (AWPP) and infilled ancient wood pasture and parkland (IAWPP). Note "wooded continuously" doesn't mean there's been a continuous tree cover across the whole site. Not all trees in the woodland have to be old. Open space, both temporary and permanent, is an important component of ancient woodlands.

Appropriate Assessment – Appropriate Assessment (AA) refers to stage 2 of the Habitat Regulations Assessment (HRA) process. It considers the impacts of a plan or project assessed against the conservation objectives of a European Site, in order to identify whether there are likely to be any adverse effects on site integrity and site features. The purpose of appropriate assessment of local plans is to ensure that protection of the integrity of European sites is a part of the planning process at a regional and local level.

Article 4 Direction – a direction made under Article 4 of the Town and Country Planning (General Permitted Development) (England) Order 2015 which withdraws permitted development rights granted by that Order.

Area Type – a spatial category identified on the Policies Map and used by the Local Plan to apply location-specific policy expectations. For Policies LWL1 and LWL2 these comprise the Bexhill Urban Area, Bexhill Suburban areas, Historic Towns, Live Well Locally Areas, Village areas and Countryside areas.

Authority Monitoring Report (AMR) – produced by the local authority to assess the impact of policies and whether targets are being met, and where necessary identify adjustments or revision to policies/proposals.

Biodiversity – the whole variety of life encompassing all genetic, species and ecosystem variations, including plants and animals.

Bioregional Design – an approach to design that responds to the natural systems, resources, materials, climate, ecology, hydrology, landscape character and local supply chains of the area in which development is located.

Biodiversity Action Plan (BAP) – a strategy aimed at conserving and enhancing biological diversity, operational until 2012. UK BAP priority species and habitats have now been succeeded by Priority Habitats and Species as identified under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006.

Biodiversity Net Gain (BNG) – a mandatory requirement in England under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021) – for developers of sites that need planning permission – and Schedule 2A of the Planning Act 2008, (as inserted by Schedule 15 of the Environment Act 2021). It ensures that habitats for wildlife are left in a measurably better state than they were before the development. This means a development will result in more or better-quality natural habitat than there was before development.

Biodiversity Opportunity Area (BOA) – landscape-scale areas identified as having the greatest opportunities for habitat creation and restoration. Mapped through work carried out by the Sussex Biodiversity Record Centre.

Brownfield Land/Site – land which has previously been developed (see Previously Developed Land).

Brownfield Land Register – registers of previously developed land that local planning authorities consider to be appropriate for residential development, having regard to criteria in the Town and Country Planning (Brownfield Land Registers) Regulations 2017. Local planning authorities will be able to trigger a grant of permission in principle for residential development on suitable sites in their registers where they follow the required procedures.

Building Regulations – regulations which are separate from the planning act, but which have to be adhered to in the construction of development.

Building for a Healthy Life – a design framework used to inform and assess residential development, including how proposals respond to context, create well-structured streets and spaces, provide movement choice and support healthy and inclusive places, including any successor framework.

Building with Nature – a framework for the planning, design, delivery and long-term management of high-quality green and blue infrastructure, including any successor standards.

Build to Rent – purpose-built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more and will typically be professionally managed stock in single ownership and management control.

Built Form – the three-dimensional arrangement of buildings, streets, spaces, landscape and infrastructure within a development or place.

Campaign for Real Ale (CAMRA) – an independent voluntary consumer organisation which promotes real ale, real cider and the traditional British pub.

Campaign to Protect Rural England (CPRE) – a registered charity with over 60,000 members and supporters, formed in 1926 to limit urban sprawl and ribbon development.

Catchment Flood Management Plan (CFMP) – a Catchment Flood Management Plan is a strategic planning tool through which the Environment Agency will seek to work with other key decision-makers within a river catchment to identify and agree policies for sustainable flood risk management.

Circular Economy – an approach that seeks to keep buildings, components and materials in use for as long as possible through retention, reuse, repair, adaptation and recovery, while minimising waste and enabling materials to be recovered and reused at the end of their useful life.

Combined Heat and Power – CHP plants incorporate both power and heat from a single heat source.

Commitments – the use of the term in this plan relates to all proposals for development which are the subject of a current full or outline planning permission.

Community Facilities and Services – facilities and services that meet the social, health, educational, cultural, recreational, religious or other everyday needs of a community. They include medical, health and social services; local shops and halls; and arts, cultural, educational, leisure, recreation and religious facilities. Residential care homes and nursing homes are addressed separately through the relevant housing policy.

Community Infrastructure Levy (CIL) – a levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area, as set out in regulations.

Community-led development – a development taken forward by, or with, a not-for-profit organisation, that is primarily for the purpose of meeting the needs of its members or the wider local community, rather than being a primarily commercial enterprise. The organisation should be created, managed and democratically controlled by its members, and membership of the organisation should be open to all beneficiaries and prospective beneficiaries of that organisation. It may take any one of various legal forms including a co-operative society, community benefit society and company limited by guarantee. The organisation should own, manage or steward the development in a manner consistent with its purpose, potentially through a mutually supported arrangement with a Registered Provider of Social Housing. The benefits of the development to the community should be clearly defined and consideration given to how those benefits can be protected over time, including in the event of the organisation being wound up.

Compact Development – development in which buildings, streets, spaces and uses are arranged to make efficient use of land, support walkable and well-connected neighbourhoods and contribute positively to local character and quality of place. Compact development does not necessarily mean uniformly high density or an urban form of development.

Comparison Goods/Floorspace – comparison goods are items not obtained on a frequent basis. These include clothing, footwear, household and recreational goods.

Conservation Area – an area designated under the Town and Country Planning (Listed Building and Conservation Areas) Act 1990 on account of its special architectural or historic interest, the character and appearance of which it is intended to preserve and enhance.

Contaminated Land – land that has been polluted or harmed in some way making it unfit for safe development and usage unless cleaned.

Convenience Goods/Floorspace – convenience goods are everyday essential items, including food, drinks, newspapers/magazines and confectionery.

Core Strategy – sets out the long–term vision for the future of the area, the spatial objectives and strategic policies to deliver that vision. It forms Part 1 of the Council's current Local Plan for the District. It was adopted (approved) in September 2014 and will be superseded on the adoption of this Local Plan.

Cumulative Impact – where there are a number of developments in a locality or a continuous activity over time that together may have an increased impact on the environment, local community or the local economy.

Deliverable Sites – to be considered deliverable, sites for housing or other pitches and plots should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that homes will be delivered on the site within five years. In particular:

a. sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long-term phasing plans).

b. where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield land register, it should only be considered deliverable where there is clear evidence that homes will be delivered on-site within five years.

Density – is an indicator for how compact a development or place will be and how intensively it will be developed. Is measured in the number of dwellings per hectare. Net density includes the measure of everything that is developed in a site but excludes major roads, open and public realms, schools and commercial and community buildings. It is calculated using net development area. Gross density is the measure that includes all aspect of a site including housing, commercial space, open and public realms, roads, schools and other uses and is calculated using the site area.

Department for the Environment Food and Rural Affairs (DEFRA) – the UK Government department tasked with issues such as the environment, rural development, the countryside, wildlife, animal welfare and sustainable development.

Desire Line – the direct or naturally preferred route that people are likely to take between origins and destinations, particularly when walking, wheeling or cycling.

Design Speed – the vehicle speed that the physical layout and design characteristics of a street are intended to encourage or accommodate, rather than simply the signed speed limit applying to it.

Design for Disassembly – designing buildings, structures or components so that they can, where feasible, be readily dismantled in the future to enable repair, adaptation, reuse or recovery of materials and components.

Developable Site – to be considered developable, sites should be in a suitable location for housing development (or for traveller sites) with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

Development Boundary – a drawn boundary which represents the extent (or built-up area) of a town or village. They are used in policy to identify land within, adjacent or outside a settlement.

Development Plan – the statutory development plan is the starting point in the consideration of planning applications for the development or use of land. The development plan consists of local plans prepared by the District Council, with Minerals and Waste Local Plans prepared by the County Council, and Neighbourhood Plans prepared locally by Town or Parish Councils.

Dual-Aspect Dwelling – a dwelling with windows to habitable rooms facing in more than one direction, normally on two different external elevations.

Edge of Centre – for retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

Employment Land / floorspace – that which is in use for the following purposes – office, industrial and warehousing - falling within Use Class E(g), B2 or B8.

Environment Agency (EA) – an Executive Agency of DEFRA, this body is responsible for wide-ranging matters, including the management of water resources, surface water drainage, flooding and water quality.

Evidence Base – the information and data gathered by local authorities to justify the "soundness" of the policy approach set out in local planning documents, including physical, economic, and social characteristics of an area.

Filtered Permeability – the design of a movement network so that walking, wheeling, cycling and, where appropriate, public transport can move through an area more directly than private motor vehicles, while restricting unnecessary motor-vehicle through-movement.

Floodplain – an area of land over which water flows in time of flood or would flow but for the presence of flood defences where they exist.

Flood Zone 1 (Low Probability) – this zone comprises land assessed as having a less than 1 in 1000 annual probability of river or sea flooding in any year (<0.1%).

Flood Zone 2 (Medium Probability) – this zone comprises land assessed as having between a 1 in 100 and 1 in 1000 annual probability of river flooding (1% – 0.1%) or between a 1 in 200 and 1 in 1000 annual probability of sea flooding (0.5% – 0.1%) in any year.

Flood Zone 3a (High Probability) – this zone comprises land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%) or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year.

Flood Zone 3b (Functional Floodplain) – this zone comprises land where water has to flow or be stored in times of flood (land which would flood with an annual probability of 1 in 30 (3.3%) or greater in any year or is designed to flood in an extreme (0.1%) flood).

Frontage Parking – vehicle parking provided between a building and the street or other principal public frontage.

Forecourt Parking – a form of frontage parking comprising an area in front of a building used primarily for vehicle parking or manoeuvring.

Greenfield Land or Site – land (or a defined site) usually farmland, that has not previously been developed, also including allotments and residential gardens.

Green Infrastructure and Blue Infrastructure – a network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity. Green infrastructure includes parks, open spaces, playing fields, woodlands, street trees, allotments, private gardens, green roofs and walls, sustainable drainage systems (SuDS) and soils. Blue infrastructure includes the coast, rivers, streams, canals and other water bodies.

Green Relief – permanent and functional planting, trees, sustainable drainage or other landscape features incorporated within an area of frontage parking to break up parking and hard surfacing and provide landscape, drainage and visual benefits.

Gypsies and Travellers – persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily or permanently, and all

other persons with a cultural tradition of nomadism or of living in a caravan, but excluding members of an organised group of travelling showpeople or circus people travelling together as such. (Defined in Annex 1 of the Planning Policy for Traveller Sites, December 2024).

Habitat – the natural living space of a plant or animal.

Habitat Regulations Assessment (HRA) – this describes the entire assessment process set out in the Habitats Directive and associated regulations. It includes an 'appropriate assessment'. The Habitats Directive protects habitats and non-avian species of European importance and applies to Special Areas of Conservation (SACs) while the European Directive (79/409/EEC) on the Conservation of Wild Birds (Birds Directive), protects bird species of European importance and applies to Special Protection Areas (SPAs).

Habitats Site – any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas, any relevant Marine Sites, and compensatory habitats which relate to these sites.

Healthy Streets – an approach to the planning and design of streets that considers how the street environment supports walking, wheeling and cycling, safety, comfort, clean air, opportunities to stop and rest, shade and shelter and other aspects of health and wellbeing.

Historic Street – a street, lane, square, routeway or public-realm space that contributes positively to the significance, character or appearance of a conservation area, listed building, historic settlement or other heritage asset.

House of Multiple Occupation (HMO) – as defined under section 254 of the Housing Act 2004 (as amended) as:

> (1) a house which has been converted entirely into bedsits or other non-self-contained accommodation, and which is let to three or more tenants who form two or more households and who share kitchen, bathroom or toilet facilities;
>
> (2) a converted house which contains one or more flats which are not wholly self-contained (i.e. the flat does not contain within it a kitchen, bathroom and toilet) and which is occupied by three or more tenants who form two or more households.

Housing Association – a non-profit making, independent organisation that provides housing; generally, they provide accommodation for people in housing need who are unable to afford to buy or rent housing on the open market.

Housing and Economic Development Needs Assessment (HEDNA) – a background evidence study that assesses the future development needs for different types of housing and employment uses through the Local Plan period.

Housing and Economic Land Availability Assessment (HELAA) – a background evidence study that examines the suitability, availability and achievability of potential new sites for housing and employment uses.

In-Curtilage Parking – vehicle parking provided within the curtilage of the dwelling or other building that it serves, rather than within the public highway or a communal parking area.

Index of Multiple Deprivation – a measure of relative deprivation across the UK based on income, employment, education, health, crime, and other factors.

Infill Development – development of a vacant site in a substantially developed frontage or area.

Infrastructure – the basic requirements for the satisfactory development of an area including such things as roads, footpaths, sewers, schools, open space and other community facilities.

Intermediate Affordable Housing for sale – a general term to describe Affordable Housing for sale, usually shared ownership.

Landscape Character Assessment – an assessment to identify different landscape areas which have a distinct character based on a recognisable pattern of elements, including combinations of geology, landform, soils, vegetation, land use and human settlement.

Landscape Sensitivity Assessment – an assessment of the resilience, or robustness, of a landscape to withstand specified change arising from development types or land management practices, without undue negative effects on the landscape and visual baseline and their value.

Level-Surface Street – a street or public space in which pedestrian areas and vehicle movement areas are provided at substantially the same level rather than being separated by a conventional raised kerb.

Listed Building – a nationally protected building of special architectural or historic interest as designated by Historic England on behalf of the Department for Digital, Culture, Media and Sport.

Live Well Locally Area – an area type comprising a planned urban extension, intended to develop over time as a well-connected, walkable neighbourhood with access to an appropriate range of local facilities and services.

Local Area for Play (LAP) – a small area of open space for young children to play games such as tag, hopscotch, French cricket or play with outdoor toys. The activity zone should be reasonably flat, have a grass surface, and minimum area of 100sqm. There should be seating for carers and appropriate landscaping/buffer zones.

Local Equipped Area for Play (LEAP) – a play area equipped for children. The activity zone should have a minimum area of 400sqm, with grass playing space and at least five types of play equipment with appropriate safety surfacing. There should also be seating for accompanying adults.

Local Development Scheme (LDS) – a document setting out the programme for the preparation of the local planning policy documents. It sets out a 3-year programme and includes information on consultation dates.

Local Distinctiveness – the positive features of a locality that contributes to its special character and sense of place, distinguishing one local area from another.

Local Housing Need – the number of homes identified as being needed through the application of the standard method set out in National Planning Policy Framework (NPPF).

Local Plan 2006 – Local Plan adopted by Rother District Council in 2006, some saved policies of which still form part of the current development plan for the district.

Local Planning Authority – the public authority whose duty it is to carry out specific planning functions for a particular area. All references to local planning authority include the district council, London borough council, county council, Broads Authority, National Park Authority, the Mayor of London and a development corporation, to the extent appropriate to their responsibilities.

Local Wildlife Sites (LWS) – A term used to describe non-statutory areas identified by local authorities in the development plan for their biodiversity value. There are a number of different terms in use locally to describe these sites, including Sites of Importance for Nature Conservation (SINCs) and Sites of Nature Conservation Importance (SNCIs) and County Wildlife Sites (CWS).

Low Energy Transformation Initiative (LETI) – established in 2017 to support the transition to net zero, originally in London. It is a voluntary network of over 1000 built environment professionals, working together to put the UK and the planet on the path to a zero-carbon future. They have created best practice model standards for organisations to adhere to.

Main Town Centre Uses – retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas,

restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Market Housing – private housing for rent or for sale, where the price is set in the open market.

Masterplan – a framework or detailed document outlining the overall strategy for design and development of a specific area, setting out principles and proposals for land use, infrastructure, buildings, spaces and movement.

Material Consideration – a matter that should be taken into account in deciding a planning application or on an appeal against a planning decision.

Mitigation Measures – measures which are put in place to reduce or eliminate any harm caused e.g. if building a house in an area of flood risk, the developer could build the house on stilted foundations to minimise the risk as a mitigation measure.

Mixed Use – development containing some mixture of commercial, retail and/or residential uses.

Mobility Hub – a location that enables convenient interchange between different forms of transport, particularly active travel and public transport. Depending on its scale and context, it may include facilities such as cycle parking, seating, travel information, shared mobility, parcel collection, electric-vehicle charging and links to public or community transport.

Multi-Use Games Area (MUGA) – an outdoor fenced area for various types of games, such as football, basketball or tennis.

National Highways – an executive agency of the Department of Transport responsible for operating, maintaining and improving the strategic road network of England.

National Landscapes – areas legally designated as areas of outstanding natural beauty under the National Parks and Access to the Countryside Act 1949 and Countryside and Rights of Way Act 2000. National Landscapes fall within the Protected Landscapes Duty as defined by Section 245 of the Levelling-up and Regeneration Act 2023 where relevant authorities must 'seek to further' the statutory purposes of Protected Landscapes. Formally known as Areas of Outstanding Natural Beauty.

National Nature Reserve (NNR) – NNRs contain examples of some of the most important natural and semi-natural terrestrial and coastal ecosystems in Great Britain. They are managed to

conserve their habitats or to provide special opportunities for scientific study of the habitats, communities and species represented within them. NNRs are declared by the statutory country conservation agencies under the National Parks and Access to the Countryside Act 1949 and the Wildlife and Countryside Act 1981.

National Planning Policy Framework (NPPF) – the National Planning Policy Framework sets out the Government's planning policies for England and how these are expected to be applied. It provides a framework within which locally prepared plans for housing and other development can be produced.

Natural England – is a Non-Departmental Public Body of the UK Government. It was formed (vested) on 1 October 2006. It is responsible for ensuring that England's natural environment, including its land, flora and fauna, freshwater and marine environments, geology and soils are protected and improved. It also has a responsibility to help people enjoy, understand and access the natural environment.

Natural England Green Infrastructure Framework – is a tool resulting from the Government's 25 Year Environment Plan. It provides an England-wide evidence base to help local authorities and others target Green Infrastructure improvements where they are most needed.

Neighbourhood Plan – a plan prepared by a parish council or neighbourhood forum for a designated neighbourhood area. In law this is described as a neighbourhood development plan in the Planning and Compulsory Purchase Act 2004.

Net Developable Area – For the purposes of residential density, the part of a development site used for residential buildings, access streets, parking and incidental open space within the development. It excludes strategic landscaping and open space, structural planting, land required for biodiversity net gain, sustainable drainage infrastructure serving wider areas and other land that does not form part of the developable residential layout.

Net Residential Density – the number of dwellings per hectare calculated using the net developable area of the site.

Older People – people over or approaching retirement age, including the active, newly-retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs.

Open Space, Sport and Recreation Study – the Study (2007) undertook an audit and assessment of open space across Rother district in accordance with national guidelines. The Study assessed open space, sport and recreational needs of people living, working and visiting Rother,

produced local provision standards and identified areas of surplus and deficiency based on quantity quality and accessibility across the district.

Parameter Plan – a plan defining the key spatial or design parameters within which subsequent detailed development must take place. Parameters may include the broad disposition of land uses and developable areas, access and movement, connections, green and blue infrastructure, open space, landscape structure, drainage, density and building heights.

Parish Council – a type of local authority found in England which is the lowest, or first, tier of local government. They are elected bodies and are responsible for areas known as civil parishes. They cover only part of England; corresponding to 40% of the population, but cover all of Rother, including Bexhill, Battle and Rye which are known as Town Councils. Parish and Town Councils can prepare Neighbourhood Plans.

Parking Court – a grouped parking area serving a number of dwellings or other uses, usually located away from the principal street frontage. A rear parking court is a parking court located principally behind the buildings it serves.

Pevensey Levels Hydrological Catchment Area – An area that has particular drainage requirements, necessary to avoid surface water and water quality impacts on the designated Pevensey Levels Ramsar site (wetland of international importance). The Pevensey Levels is one of the largest and least-fragmented lowland wet grassland systems in south-east England.

Planning Obligation – a legal obligation under section 106 of the Town & Country Planning Act 1990 to mitigate the impacts of a development proposal, sometimes referred to as 'developer contributions' or 's106'. They are either in the form of a legal agreement between a planning authority and the persons with an interest in the land, or undertakings offered unilaterally by the landowner. Planning obligations run with the land, are legally binding and enforceable.

Planning Practice Guidance – planning guidance published by the Government to supplement the NPPF.

Previously Developed Land – land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed). It also includes land comprising large areas of fixed surface infrastructure such as large areas of hardstanding which have been lawfully developed. Previously developed land excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as

residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.

Priority Habitats and Species – also known as Habitats and Species of Principle Importance. Those habitats and species included in the England Biodiversity List published by the Secretary of State under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. Replaces the previous Biodiversity Action Plan (BAP) designations.

Ramsar Site – wetlands of international importance, designated under the 1971 Ramsar Convention.

Renewable and Low Carbon Energy – includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).

Rural Exception Sites – small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. A proportion of market homes may be allowed on the site at the local planning authority's discretion, for example where essential to enable the delivery of affordable units without grant funding.

Rural Diversification Scheme – development of non-agricultural or land-based operations located within an existing and active farm or land-based business to promote the viability of the existing business, while remaining ancillary and subordinate in scale.

Run-off – that part of precipitation, snow melt, or irrigation water that runs off the land into streams or other surface water. It can carry pollutants from the air and land into the receiving waters.

Self-build and custom-build housing – housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing. A legal definition, for the purpose of applying the Self-build and Custom Housebuilding Act 2015 (as amended), is contained in section 1(A1) and (A2) of that Act.

Sequential Approach/Test – a planning principle that seeks to identify, allocate or develop certain types or locations of land before others. For example, brownfield sites before greenfield

sites or town centre retail sites before out-of-centre sites, or areas at low risk of flooding before areas of medium and high risk of flooding.

Shared-Space Street – a street or space in which conventional physical separation between some or all users is reduced or removed, requiring particular consideration of inclusive access, legibility and safety.

Shoreline Management Plan (SMP) – a Shoreline Management Plan (SMP) provides a largescale assessment of the risks associated with coastal evolution and presents a policy framework to address these risks to people and the developed, historic and natural environment in a sustainable manner. In doing so, an SMP is a high-level document that forms an important part of the Department for Environment, Food and Rural Affairs (Defra) strategy for flood and coastal defence.

Site of Special Scientific Interest (SSSI) – an area of special interest by reason of its flora, fauna, geological or physiographical features as identified by Natural England and designated under the Wildlife and Countryside Act 1981.

Soundness – a test of a Local Plan. Plans are sound if they are positively prepared; justified; effective; and consistent with national policy. The tests of soundness are set out in full in the NPPF.

Special Area of Conservation (SAC) – areas defined by regulation 3 of the Conservation of Habitats and Species Regulations 2017 which have been given special protection as important conservation sites. (Together with SPAs, SACs form a network of Habitats Sites.)

Special Protection Area (SPA) – areas classified under regulation 15 of the Conservation of Habitats and Species Regulations 2017 which have been identified as being of international importance for the breeding, feeding, wintering or migration of rare and vulnerable species of birds. (Together with SACs, SPAs form a network of Habitats Sites).

Supplementary Planning Documents (SPDs) – these can be produced to provide policy guidance to supplement the policies and proposals in Local Plans. However, they do not form part of the Development Plan although they must undergo a formal process of consultation.

Stewardship – the long-term governance, management, maintenance and care of shared spaces, community assets, green and blue infrastructure, sustainable drainage and other communal assets within a development.

Strategic Flood Risk Assessment (SFRA) – an assessment of the likelihood of flooding in a particular area so that development needs and mitigation measures can be carefully considered.

Strategic Gap – area of largely open land between settlements, which helps to maintain the separate identity and amenity of settlements and prevent them merging together. The boundaries are defined in the Local Plan.

Submission – the final stage in preparation of Plans, whereby they are submitted to the Secretary of State for an Independent Examination.

Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA) – local Planning Authorities are required to assess the environmental and sustainability impact of policies and proposals in Local Plans and Supplementary Planning Documents. This is a tool for appraising policies to ensure that they reflect sustainable development objectives, i.e. social environmental and economic factors.

Sustainable Access and Recreation Management Strategy (SARMS) – a joint approach between Rother and Folkestone and Hythe District Councils which seeks to ensure that any increases in access and recreational usage of land within or adjacent to the Dungeness Complex of Habitats Sites does not adversely impact on the integrity of the sites.

Sustainable Communities – places where people want to live and work, now and in the future. They meet the diverse needs of existing and future residents, are sensitive to their environment, and contribute to a high quality of life. They are safe and inclusive, well planned, built and run, and offer equality of opportunity and good services for all.

Sustainable Development – development that meets the needs of the present without compromising the ability of future generations to meet their own needs; ensures a better quality of life for everyone now and for generations to come.

Sustainable Drainage Systems (SuDS) – a sustainable drainage system controls surface water run off close to where it falls, combining a mixture of built and nature-based techniques to mimic natural drainage as closely as possible, and accounting for the predicted impacts of climate change. The type of system that would be appropriate will vary from small scale interventions such as permeable paving and soakaways that can be used in very small developments to larger integrated schemes in major developments.

Sustainable Transport Modes – any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra-low emission vehicles, car sharing and public transport.

Town Council – in England, town councils are civil parish councils, where the civil parish has declared itself to be a town. Civil parishes are the most local level of elected governance, under the district, unitary or county level. There are three in Rother district covering Battle, Bexhill and Rye. Town Councils can prepare Neighbourhood Plans.

Transport Assessment – Transport Assessments are thorough assessments of the transport implications of development. Transport Assessments may propose mitigation measure in relation to any adverse implications of a development, which may also inform the preparation of a Travel Plan.

Travel Plan – a document most commonly produced by/for a large employer which tends to generate a large number of journeys by car. The plans include measures to reduce car dependency and facilitate transport choice, by encouraging more sustainable alternatives to car use.

Travelling Showpeople – members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined in the national Planning Policy for Traveller Sites, December 2024.

Tree Preservation Order (TPO) – an Order made by a planning authority specifying trees which may not be lopped, topped or felled without consent, except where they become dead, dying or dangerous, when replacements may be required.

Vitality and Viability – in terms of retailing, vitality is the capacity of a centre to grow or to develop its level of commercial activity. Viability is the capacity of a centre to achieve the commercial success necessary to sustain the existence of the centre.

Walking, Wheeling and Cycling – forms of active travel. 'Wheeling' refers to pedestrian-paced mobility using wheelchairs, mobility scooters, rollators and other mobility aids.

Whole-Life Carbon – the greenhouse-gas emissions associated with a building or development over its whole life, including embodied carbon associated with materials and construction and operational carbon associated with its use.

Windfall sites – sites not specifically identified in the development plan.

Appendix 3: Housing Trajectory

Housing Trajectory

	2025/26 Year 1	2026/27 Year 2	2027/28 Year 3	2028/29 Year 4	2029/30 Year 5	2030/31 Year 6	2031/32 Year 7	2032/33 Year 8	2033/34 Year 9	2034/35 Year 10	2035/36 Year 11	2036/37 Year 12	2037/38 Year 13	2038/39 Year 14	2039/40 Year 15	2040/41 Year 16	2041/42 Year 17	TOTAL
Annual requirement (X)	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	**8,670**
Annual supply (Y), comprising of:																		
Completions	264	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	264
Extant (>=10)	150	150	170	135	40	20												665
Extant (<10)	9	8				6												23
Local Plan site allocations	-	70	229	687	826	959	766	680	720	367	241	170	240	380	302	225	-	6,862
Rye Neighbourhood Plan	-	-	66	139	105	8	-	7	-	-	-	-	-	-	-	-	-	325
Wind fall				38	38	38	38	38	38	38	38	38	38	38	38	38	38	532
Total annual supply (Y)	423	228	465	999	1,009	1,031	804	725	758	405	279	208	278	418	340	263	38	8,671
Annual balance (Y - X)	-87	-282	-45	489	499	521	294	215	248	-105	-231	-302	-232	-92	-170	-247	-472	
Cumulative balance	-87	-369	-414	75	574	1,095	1,389	1,604	1,852	1,747	1,516	1,214	982	890	720	473	1	

Future Requirement Trajectory

	PAST	FUTURE REQUIREMENT TRAJECTORY																TOTAL
	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	2041/42	
Annual requirement (X)	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	510	8,670
5Y housing needs	510	2,550					2,550					2,550					510	

Future Supply Trajectory

	PAST	FUTURE SUPPLY TRAJECTORY																TOTAL
	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	2040/41	2041/42	
Total annual supply (Y)	423	228	465	999	1,009	1,031	804	725	758	405	279	208	278	418	340	263	38	8,671
5Y housing supply trajectory	423	3,732					2,971					1,507					38	

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