

Rother District Local Plan 2025 - 2042

Statement of Cooperation

Regulation 19 (Pre-submission) version

October 2026

If you require this document in another format, please contact:

Planning Policy Team, Rother District Council, Town Hall,
London Road, Bexhill-on-Sea East Sussex, TN39 3JX

Telephone: **01424 787668**

Email: **draftlocalplan@rother.gov.uk**

Contents

1.	Introduction	3
	Purpose of this document.....	3
	Legislative and policy context	4
	Town and Parish councils.....	4
	Rother context	5
2.	Strategic cross boundary matters	7
	Meeting housing needs.....	7
	Meeting accommodation needs of gypsies, travellers and travelling showpeople.....	8
	Meeting economic development needs	9
	Furthering the purpose of the High Weald National Landscape	10
	Conserving and enhancing the historic environment	11
	Protecting and enhancing biodiversity and open spaces	12
	Coastal change and marine management.....	13
	Sustainable transport and movement.....	14
	Sustainably managing waste and minerals	15
	Climate resilience (including flood risk and water management)	16
	Securing the timely delivery of infrastructure to support growth	16
3.	Demonstrating effective and ongoing cooperation	18
	Statements of Common Ground	18
	Consultation on the Draft Rother Local Plan (2024)	18
	Consultation on the Draft Rother Local Plan (2026)	19
	External planning consultations	20
	Planning Working Groups.....	22
	Shared evidence base	23
	Requests made by the Council regarding unmet housing need	24
	Record of cooperation with prescribed bodies	25
4.	Progress and outcomes to-date	38

Abbreviations

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

1. Introduction

Purpose of this document

- 1.1. This Statement of Cooperation has been prepared to support the new Rother Local Plan.
- 1.2. Rother District Council (“the Council”) is producing a new Local Plan for the period covering 2025-2042. Subject to its adoption, the new Local Plan will form part of the statutory Development Plan for the district. It will update and replace Rother’s Core Strategy (2014) and Development and Site Allocations (2019) plans. The new Local Plan will contain a vision, strategic objectives and planning policies which together will help to steer development across the district and inform planning decisions.
- 1.3. National planning policies require the Council to carry out effective and on-going cooperation with other strategic policy making authorities and relevant bodies during the preparation of the Local Plan. This includes but is not limited to neighbouring local authorities, county councils and Government bodies (such as the Environment Agency, Historic England and Natural England). Effective cooperation is integral to the production of a positively prepared and justified plan, and it is therefore considered a matter of ‘soundness’ during the examination of the Local Plan.
- 1.4. This Statement of Cooperation builds upon and should be read together with previous related documents prepared by the Council, as follows:
 - Interim Duty to Cooperate Statement (2026)
 - Statement of Engagement and Duty to Cooperate Statement (2024)
 - New Local Plan Early Engagement Document (2021)
- 1.5. These documents are available to view on the Council’s Local Plan [evidence base webpage](#).

Legislative and policy context

- 1.6. The legislative and policy framework for the Council to carry out and demonstrate cooperation with other bodies during the plan-making process has changed during the preparation of the new Rother Local Plan.
- 1.7. The Duty to Cooperate was established under Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended by Section 110 of the Localism Act 2011). It required local planning authorities, county councils and public bodies in England to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan preparation relating to strategic cross-boundary matters. The Duty to Cooperate was a test of 'legal compliance' during the examination of Local Plans.
- 1.8. Importantly, the Duty to Cooperate was revoked by the Government with effect from 25th March 2026. Accordingly, emerging local plans – including the new Rother Local Plan - are no longer required to satisfy the provisions of the Duty to Cooperate.
- 1.9. Emerging local plans assessed under the "legacy system"¹ will still need to be prepared having regard to the National Planning Policy Framework (NPPF) (December 2024) policies (as set out in Paragraphs 24 – 28) and associated guidance on maintaining effective cooperation. Cooperation is considered a 'test of soundness' during the examination. For the avoidance of doubt, the new Rother Local Plan is being submitted for examination under the legacy system.
- 1.10. As the revocation of the Duty to Cooperate occurred during the production of the Rother Local Plan, the Council's previous statements on cooperation have been prepared in response to the legislative requirements at that time.

Town and Parish councils

- 1.11. Town and Parish Councils were not a prescribed body for the purposes of the Duty to Cooperate. However, the Council has recognised the important role that they play in planning locally, particularly through Neighbourhood Planning.

¹ Under the Government's transitional arrangements to the new planning system, the legacy system principally comprises The Town and Country Planning (Local Planning) (England) Regulations 2012, as amended, and the NPPF (December 2024).

The Council continues to support parish councils in the preparation and review of their Neighbourhood Plans, in line with the statutory requirements. Furthermore, the Council has engaged with parish councils during the preparation of the new Rother Local Plan. As an alternative to Neighbourhood Plans, the Council is aware that some parish councils are considering preparing a Parish Priority Statement. The Council will support parish councils in this process.

- 1.12. It is noted that the Government's Planning Practice Guidance² states that Neighbourhood Planning bodies are not required to produce or be involved in a Statement of Common Ground.

Rother context

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

Figure 1 - Rother Local Plan geographic context



² National Planning Practice Guidance, Paragraph: 009 Reference ID: 61-009-20190315, Revision date: 15 03 2019

- 1.15. Rother contains the coastal town of Bexhill-on-Sea, and the historic towns of Battle and Rye. There are also many parishes, villages and other settlements located throughout the district. The A21 trunk road runs through the centre of the district north and south, and the A259 runs east and west near the coast.
- 1.16. 83 per cent of the district is located within the High Weald National Landscape, a designated 'Area of Outstanding Natural Beauty'. The High Weald is one of the best remaining examples of a medieval landscape in Northern Europe consisting of woods, small fields, farmsteads and ancient routeways.
- 1.17. Rother benefits from the presence of built and natural heritage assets. The historic environment is a highly valued and distinctive feature of the area, with statutory protection of over 2,000 listed buildings, 10 Conservation Areas, a number of Scheduled Ancient Monuments, as well as the 'Historic Battlefield' at Battle.
- 1.18. Approximately 7 per cent of the district includes internationally or nationally protected habitats sites. The Pevensey Levels, straddling the south-western boundary of the district, is a 'Ramsar' site, designated for its international importance as a wetland habitat and a Special Area of Conservation (SAC). On the south-eastern boundary, the Dungeness Complex of Habitats Sites comprises three overlapping international designations – the Dungeness, Romney Marsh and Rye Bay Special Protection Area (SPA) and Ramsar Site and the Dungeness Special Area of Conservation (SAC). There are also many Sites of Special Scientific Interest (SSSIs) in Rother.
- 1.19. The partly low-lying and coastal nature of the district, along with its intricate network of ridges and valleys, make it particularly vulnerable to flooding. The predominant flood risk comes from the sea, rivers and watercourses, although the district also experiences surface water flooding. The majority of the coast benefits from flood defences.
- 1.20. Rother district effectively wraps around Hastings Borough. Because of their proximity and interconnectivity, Rother and Hastings share both a housing market area and a functional economic market area.

2. Strategic cross boundary matters

- 2.1. This section of the Statement of Cooperation sets out and discusses the key strategic cross boundary matters for the production of the Rother Local Plan. These matters have been identified through consideration of the NPPF requirements for plan-making, engagement and consultation with key stakeholders (including the former prescribed Duty to Cooperate bodies, and other relevant bodies), as well as through the consideration of the Local Plan evidence base. The matters are not presented in order of priority or importance.
- 2.2. The section includes some references to and examples of the Council's cooperation and engagement with consultation bodies. These have been included here to draw out and support the discussion on the key strategic cross boundary matters. Further details of the Council's cooperation and engagement with the are set out in Section 3 and 4 of this report.

Meeting housing needs

- 2.3. The NPPF stipulates that the national 'standard method' should be used to calculate the minimum amount of housing required in an area. At the time of the first Regulation 18 consultation on the draft Rother Local Plan in summer 2024, the standard method yielded a figure for the district of 733 net new homes per year. The NPPF was then updated in December 2024 along with changes to the standard method. It now yields a figure for the district of 912 net new homes per year. At the Regulation 19 stage, the local housing need figure for Rother is 895 net new homes per year, or 15,215 over the 17-year plan period.
- 2.4. From the early stages of the plan process, the Council has identified housing need and delivery as a key strategic cross boundary matter. It has indicated that there is unlikely to be sufficient suitable and available land to accommodate the full extent of needs set using the standard method. This is particularly given the significant step change from the Core Strategy housing target to the Government's latest housing need figure. Importantly, the heavily constrained nature of the district (including that roughly 90 per cent of the district is a National Landscape or protected habitat site) means it is not suitable for unrestricted development.

- 2.5. As discussed later in this report, the Council has, on two occasions, written to neighbouring and other close-by authorities to formally request that they consider accommodating potential unmet housing needs arising in Rother. The letters were sent in June 2024 and October 2026, in association with the first and second Regulation 18 consultations on the Draft Rother Local Plan. These authorities confirmed that they were unable to, or not anticipating being able to, take on housing needs from Rother due to either not being able to meet their own needs in full, or not having any additional land capacity.
- 2.6. At this time, with the publication of the Regulation 19 Pre-submission Local Plan, the Council is not in a position to meet its identified housing need in full (i.e., Government's Local Housing Need figure). The reasons for this are set out in the Local Plan. Therefore, the Council is not currently in a position to take on any unmet need from neighbouring or other authority areas. This situation is not unique to Rother. There are many other authorities in South-East England that are experiencing challenges in meeting identified housing needs in full.
- 2.7. It is noteworthy that Rother district and Hastings borough form a single Housing Market Area and Functional Economic Market Area (FEMA). Therefore, the Councils have cooperated to prepare a joint Housing and Economic Development Needs Assessment (HEDNA) to support the production of their respective emerging Local Plans. The Councils are continuing to cooperate to address needs across the area.

Meeting accommodation needs of gypsies, travellers and travelling showpeople

- 2.8. The national Planning Policy for Traveller Sites (PPTS, updated 2024) sets out the Government's planning policy for the gypsy, traveller and travelling showpeople community. The PPTS confirms that Local Planning Authorities should make their own assessments of accommodation needs and, through Local Plans, set pitch targets for gypsies and travellers, and plot targets for travelling showpeople, which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring LPAs.
- 2.9. The Council is currently cooperating with all the other LPAs in East Sussex to identify and plan for the accommodation needs of gypsies, travellers and travelling

showpeople. This is through a working group with an emerging Memorandum of Understanding, and also through shared work on the East Sussex Gypsy and Traveller Accommodation Assessment (GTAA). The first GTAA was published in 2022, and an update is underway, including the launch of a county-wide “Call for Sites” exercise in Summer 2025 to help identify available land. The Council is also engaging with other neighbouring local authorities, outside East Sussex, through the Duty to Cooperate and endeavouring to understand their position on provision for this group.

- 2.10. The Regulation 19 Pre-submission Rother Local Plan includes provisions to meet Rother’s identified needs for this group, as identified in the GTAA 2022. This position is subject to review pending the findings of the GTAA update, which has not been finalised at the time of the publication of the Local Plan.

Meeting economic development needs

- 2.11. The NPPF (2024) provides that Local Plans should help to build a strong and competitive economy, by helping to create the conditions in which businesses can invest, expand and adapt. It therefore encourages Local Plans to set out a clear economic vision and strategy which encourages sustainable economic growth, including by making provisions to meet identified economic development needs over the plan period.
- 2.12. The Council’s evidence base indicates that Rother district and Hastings borough comprise a self-contained Functional Economic Market Area (FEMA). This is due to the strength of links within the FEMA focused between Hastings, Bexhill and Battle (and to a lesser extent Rye) as the main urban concentrations of employment and economic activity. It is further reinforced by the profile of north-south and east-west links, focusing connections upon these settlements, and the relative absence of strategic transport links and influence of other urban centres upon the FEMA.
- 2.13. In light of this evidence, the Council has cooperated with Hastings Borough Council to prepare a joint Housing and Economic Development Needs Assessment. This sets out the overall need for land and floorspace for employment and economic development across the FEMA, whilst also setting requirements for the respective local authority areas. Through the preparation

of the Local Plan, a key strategic issue is therefore seeking to ensure that Rother's identified needs are met, whilst also responding to needs across the FEMA.

- 2.14. One of the key and distinctive economic sectors in the FEMA is the visitor economy, which operates in both urban and rural areas. To help inform the production of their respective Local Plans, the Council and Hastings Borough Council have jointly commissioned a Tourism and Visitor Accommodation Study. This evidence will help to ensure a coordinated approach to promoting and supporting this sector within the FEMA as well as managing development proposals for associated uses.

Furthering the purpose of the High Weald National Landscape

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

the HWNL, subject to it meeting the other requirements of NPPF paragraphs and the legal duty.

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

Conserving and enhancing the historic environment

- 2.20. Rother has a rich historic environment and a valuable and extensive historic building stock, including as it does the historic market towns of Battle and Rye, the Victorian and Edwardian seaside town of Bexhill-on-Sea, the important planned medieval town of Winchelsea, and a host of picturesque villages and hamlets, listed buildings, including many isolated farmsteads dispersed throughout the High Weald, together with modernist buildings from the 1930s and 1960s.
- 2.21. The district's historic built environment has a high level of statutory protection; designated heritage assets include Listed Buildings, Conservation Areas, Scheduled Ancient Monuments, Registered Parks and Gardens, and the 'Historic Battlefield' at Battle. Many other non-designated buildings and archaeological assets contribute positively to the physical, historic and socio-cultural character of the district.

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

Protecting and enhancing biodiversity and open spaces

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

which the Council has prepared with Folkestone and Hythe District Council (formerly Shepway District Council). The need for the SARMS has arisen through work on the authorities' respective Local Plans and supporting HRA. It pertains to the Dungeness complex of internationally important wildlife sites. The SARMS provides a strategic cross-boundary approach to issues relating to disturbance from recreational pressure.

- 2.27. Strategic cross boundary matters also include the protection and enhancement of open spaces, particularly in the context of the preparation of authorities' respective Local Plans and spatial strategies. Consideration needs to be given to the function and quality of open spaces, including the important role these spaces play in terms of their environmental functions (such as support for biodiversity and flood risk management), providing amenity for the local population, and preventing the coalescence of settlements. Rother's relationship with Hastings is notable, for example, in terms of the 'strategic gap' between Bexhill and Hastings, the Coombe Valley Countryside Park and Hastings Country Park.

Coastal change and marine management

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

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

Sustainable transport and movement

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

Office of Road and Rail, Active Travel England and East Sussex County Council (as the Local Highway Authority and integrated transport authority), as well as service providers such as Network Rail (and train operating companies) and bus operators.

- 2.35. The Council, in collaboration with key transport stakeholders including East Sussex County Council and National Highways, has a shared transport evidence base. This has been used to inform the production of the Local Plan, including an Interim Assessment (2022) on potential impacts of growth on the transport network. Further detailed modelling and assessment of the Local Plan proposals have been undertaken using the East Sussex Countywide Transport Model, as work on the plan has progressed.

Sustainably managing waste and minerals

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

comments of the County Council, as waste and minerals planning authority, on the effect of any proposed allocation sites on the waste and minerals consultation areas and safeguarding areas set out in the Waste and Minerals Local Plan.

Climate resilience (including flood risk and water management)

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

Securing the timely delivery of infrastructure to support growth

- 2.42. The NPPF (2024) makes clear that Local Plans should be informed by effective joint working between strategic policy-making authorities and relevant bodies, particularly to establish where additional infrastructure is required, as well as to set out the infrastructure contributions expected from new development. The NPPF also includes policies reflecting the need for different types of infrastructure to support sustainable development and economic growth. This

includes transport, green infrastructure, social infrastructure and digital infrastructure to support sustainable development and economic growth.

2.43. The Council has prepared an Infrastructure Delivery Plan (IDP) which sets out the different types of infrastructure required to support growth and new development in Rother district, in accordance with the adopted Local Plan. Figure 2 sets out the range of categories and types of infrastructure that are relevant to Rother. Infrastructure delivery is not the sole responsibility of the Council, rather this depends on coordination amongst a wide range of infrastructure providers and other stakeholders that operate or have an interest in areas both within and beyond the district boundary – often with a sub-regional or national remit. It is therefore a key strategic cross boundary matter.

2.44. The Council’s Engagement and Duty to Cooperate Statement (2024) discusses previous engagement the Council undertook with infrastructure providers and stakeholders at the early stage of the plan process. This included consultation on an ‘IDP Questionnaire’. Feedback from this exercise, new evidence and further engagement and consultation has helped to inform the preparation of the IDP (2026).

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

Category	Type
Transport	Cycling and Walking Public transport Strategic and local road network
Community and cultural facilities	Sports and recreation facilities Libraries Arts, and cultural facilities Youth and community facilities Places of worship
Education	Early years and childcare Primary and secondary schools Further and higher education
Health and social care	Primary care: GP surgeries, health centres Secondary care: hospitals, diagnostic hubs Community care: mental health, social care, care homes
Green and blue infrastructure	Parks, open space and play areas Biodiversity and nature conservation Allotments Cemeteries and burial space Flood defences, sustainable drainage, riverside improvements

Utility and energy	Water supply and wastewater infrastructure Waste and recycling infrastructure Energy infrastructure Digital infrastructure
Emergency and security services	Police service Fire service Ambulance service

3. Demonstrating effective and ongoing cooperation

- 3.1. This section outlines engagement with strategic policy making authorities and other relevant bodies since the first Regulation 18 consultation in 2024.
- 3.2. Cooperation is ongoing through formal public consultation, external planning consultations, as well as by meetings or other correspondence (e.g. written correspondence via e-mail).
- 3.3. Figures 3, 4, 5 and 6 below help to demonstrate how the Council has engaged and consulted with consultation bodies, in the context of the strategic cross boundary matters set out in Section 2.

Statements of Common Ground

- 3.4. In accordance with the NPPF, the Council is preparing Statements of Common Ground with strategic policy making authorities and other relevant bodies to document the progress and agreement on strategic cross-boundary issues.

Consultation on the Draft Rother Local Plan (2024)

- 3.5. The Draft Rother Local Plan 2020-2040 was published for a 12-week Regulation 18 consultation, from 30 April to 23 July 2024.
- 3.6. Responses to consultation on the Draft Rother Local Plan (2024) were received from the following bodies:
- Environment Agency
 - Historic England
 - Natural England
 - Homes England
 - NHS Sussex Integrated Care Board
 - NHS Property Services

- Highway Authority (East Sussex County Council)
- Marine Management Organisation
- East Sussex County Council
- Kent County Council
- Ashford Borough Council
- Eastbourne Borough Council
- Folkestone & Hythe District Council
- Hastings Borough Council
- Tunbridge Wells Borough Council
- Wealden District Council
- High Weald AONB (National Landscape) Unit
- National Grid
- Network Rail
- Southern Water
- Sport England

3.7. Many general consultation bodies also submitted representations, including the High Weald AONB Unit, special interest groups and community groups.

3.8. Feedback received has informed the emerging Local Plan, as set out in the Interim Consultation Statement (January 2026 and associated Supplement) and Consultation Statement – Regulation 19 Pre-submission Version (October 2026).

Consultation on the Draft Rother Local Plan (2026)

3.9. The Draft Rother Local Plan 2025-2042 – Development Strategy and Site Allocations was published for an 8-week Regulation 18 consultation, from 26 January to 23 March 2026.

3.10. Responses to consultation on the Draft Rother Local Plan (2026) were received from the following bodies:

- Active Travel England
- Environment Agency
- Historic England
- Homes England
- National Grid Electricity Transmission
- National Highways

- Natural England
- Network Rail,
- NHS Property Services,
- NHS Sussex,
- Pevensey & Cuckmere WLMB,
- South East Water Ltd,
- Southern Water
- Sport England

3.11. Responses were also received from the following local authorities and county councils:

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

3.12. Many general consultation bodies also submitted representations, including the High Weald AONB Unit, special interest groups and community groups.

3.13. Feedback received has informed the emerging Local Plan, as set out in the Interim Consultation Statement (September 2026) and Consultation Statement – Regulation 19 Pre-submission Version (October 2026).

External planning consultations

3.14. The Council also responds to consultations held by external stakeholders where proposals have potential cross-boundary implications on Rother. Figure 3 below sets out the consultations the Council has formally responded to since April 2024, which coincides with the date of the first Regulation 18 consultation on the draft Rother Local Plan.

3.15. The Council does not necessarily respond to all such public consultations it is invited to submit representations to. For example, it may not submit representations in instances where Council officers have reviewed the

consultation material and consider that the project or proposals will not apply to or affect Rother district.

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

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

Authority or body	Consultation document	Date response submitted
Eastbourne Borough Council	Regulation 18 Local Plan	10 April 2026
Hastings Borough Council	Regulation 18 Local Plan	2 April 2026
Wealden District Council	Regulation 18 Local Plan	30 March 2026
Lewes District Council	Regulation 18 Local Plan	27 February 2026
East Sussex County Council	Draft Local Nature Recovery Strategy	25 November 2025
Ashford Borough Council	Draft Ashford Local Plan 2042	3 October 2025
Ministry of Housing, Communities and Local Government	Reform of Planning Committees: Technical Consultation	23 July 2025
Tunbridge Wells Borough Council	Tunbridge Wells Local Plan Main Modifications	25 April 2025
Department for Environment, Food and Rural Affairs	Land Use Framework	23 April 2025
East Sussex County Council	Draft East Sussex Rail Strategy 2025-2050	21 March 2025
East Sussex County Council	Draft East Sussex Freight Strategy 2025-2050	21 March 2025
East Sussex County Council	East Sussex Rights of Way Access Plan	21 March 2025
Transport for South East	Transport Strategy for the South East	7 March 2025
Lewes District Council	Lewes Local Plan - Defining our policies and early site allocation proposals (Regulation 18)	26 February 2025
Ministry of Housing, Communities and Local Government	Proposed Reforms to the National Planning Policy Framework and Other Changes to the Planning System	23 September 2024
Wealden District Council	Draft Wealden Local Plan (Regulation 18)	10 May 2024

Planning Working Groups

3.17. An important way in which the Council carries out cooperation is through participation in planning Working Groups. Figure 4 below sets out Working Groups that Council officers are a part of. The Council also hold Working Group meetings regularly to discuss and progress cross-boundary matters with strategic policy making authorities and other relevant stakeholders.

Figure 4 – Working Groups with Rother District Council officer participation

Name of working group	Purpose of working group	Frequency of meetings (approximate)
Ashdown Forest Working Group	To address the strategic cross boundary issue of air quality impacts on the Ashdown Forest Special Area of Conservation (SAC) that may arise from traffic associated with new development.	Quarterly/bi-annually
Combe Valley Countryside Park (CVCP) Community Interest Company Stakeholders Group and Board	To provide strategic oversight and governance for the long-term management and enhancement of the CVCP, the group provides a forum for engagement, information-sharing and collaboration between the CIC and its wide range of partners including RDC.	Quarterly
Cuckmere and Pevensey Levels Catchment Partnership	To take a joined-up approach to address problems across the river systems and maintain the rivers' health on a catchment scale.	Quarterly/bi-annually
East Sussex Gypsy, Traveller and Travelling Showpeople Accommodation Working Group	To work collaboratively on cross-boundary strategic planning issues relating to the provision of Gypsy, Traveller and Travelling Showpeople Sites.	Every two months
East Sussex Local Plan Managers Group	To discuss strategic planning issues across the county, attended by Local Plan managers from all of the District and Borough Councils and officers from ESCC.	Every two months/quarterly
East Sussex Planning for Health Working Group	To work effectively and collaboratively to deliver the County Council's statutory public health responsibilities, and the Local Planning Authority's duties to deliver relevant elements of the National Planning Policy Framework through the planning system.	Quarterly

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

Shared evidence base

3.18. The Council collaborates closely with neighbouring authorities and statutory bodies to prepare and update shared evidence base documents addressing cross-boundary issues, including:

- Hastings Borough Council (shared Housing Market Area and a Functional Economic Market Area): Joint preparation of the Housing and Economic

Development Needs Assessment (2020 and 2024), Sustainability Appraisal / Strategic Environmental Assessment Scoping Report (2021), Tourism and Visitor Accommodation Study (emerging, expected 2026), and the Playing Pitch Strategy (PPS) & Built Facilities Strategy (2023) and emerging Stage E Review of the PPS

- East Sussex County Council and National Highways: Preparation of the Shared Transport Evidence Base (STEB) which informed the Local Plan Transport Assessment via the East Sussex Countywide Transport Model, alongside a feasibility study for West Bexhill
- East Sussex local planning authorities in: An working group was established and joint working is ongoing via an emerging Memorandum of Understanding. Work includes shared commissioning to update the East Sussex Gypsy and Traveller Accommodation Assessment (GTAAI.

3.19. As set out above, the Council is cooperating with all the other local planning authorities in East Sussex to identify and plan for the accommodation needs of gypsies, travellers and travelling showpeople. This is through a working group with an emerging Memorandum of Understanding, and also through shared work on the East Sussex Gypsy and Traveller Accommodation Assessment (GTAA), an update to which is being commissioned.

Requests made by the Council regarding unmet housing need

3.20. Meeting housing needs is a key strategic cross boundary matter.

3.21. Through the preparation of the Local Plan, the Council has sought opportunities to maximise the supply of land for housing to meet identified needs within the district. However, given the highly constrained nature of the district (including the High Weald National Landscape and protected habitats sites) together with lack of suitable, available and achievable sites for development, the Government's Local Housing Need figure cannot be met in full. Further information is set out in the Regulation 19 Pre-submission Local Plan and supporting evidence base, particularly the Housing and Economic Land Available Assessment.

3.22. From the early stages of the plan process, the Council has recognised that meeting Rother's LHN in full may be an issue, and has therefore engaged with

neighbouring authorities on this matter. It has sought to understand whether Rother's unmet needs could be accommodated elsewhere, whether in part or in full, both through officer discussions and through formal requests made to the respective local authorities.

- 3.23. In June 2024, following the publication of the first Regulation 18 draft Rother Local Plan, the Council wrote to seven neighbouring and other close-by authorities to formally request that they consider accommodating potential unmet housing needs from Rother. All confirmed that they were unable to assist, or not anticipating being able to, take on housing needs from Rother due to either not being able to meet their own needs in full, or not having any additional land capacity.
- 3.24. In October 2026, following the publication of the second Regulation 18 draft Rother Local Plan, the Council wrote to neighbouring and other close-by authorities again to request assistance in meeting unmet housing need from Rother. At this time, the Council was able to provide an updated position on the extent of unmet need. As previously, none of the authorities contacted were in a position to assist in meeting any of Rother's unmet housing needs.
- 3.25. As set out earlier in this report, the situation regarding unmet housing need is not unique to Rother. There are many other authorities in South-East England that are experiencing challenges in meeting identified housing needs in full.

Record of cooperation with prescribed bodies

- 3.26. Figure 5 below provides record of cooperation with relevant authorities and bodies since April 2024.
- 3.27. This is an abridged record, as the table signposts the most recent dates of meetings and correspondence with bodies, for information. Routine administrative follow-ups and standard agenda items are not included for clarity.
- 3.28. Previous activities are recorded in the 2021 and 2024 statements, referred in Paragraph 1.4 of this report.

Figure 5 – Record of meetings and correspondence since April 2024 to date

Prescribed body or Authority	Summary of key cross boundary matters	Key evidence of co-operation April 2024 to date	Date of last meeting (or if none, date of last correspondence marked “*”)
Ashford Borough Council (ABC)	- Meeting housing needs - Meeting employment needs - Meeting gypsy and traveller accommodation needs - Cross-boundary highway matters - Dungeness complex of protected habitats sites	- Duty to Co-operate meeting - ABC Representations to Regulation 18 consultation on draft Rother Local Plan (2024) - RDC request to ABC to accommodate unmet needs arising in Rother (2024) and ABC’s response - RDC representation to Draft Ashford Local Plan 2042 Regulation 18 Consultation (2025) - RDC confirmation it has reviewed, but will not submit representations to, ABC consultation on Queens Platinum Jubilee Park masterplan (2025) - ABC representations to Regulation 18 consultation on draft Rother Local Plan (2026)	11 Aug 2025 Representations received to draft Local Plan (2026) in March 2026
Brighton & Hove City Council (BHCC)	- Waste and Minerals, with East Sussex County Council (joint Waste and Minerals Local Plan) - Strategic Planning Matters affecting East Sussex and Brighton & Hove	- Both RDC and BHCC are members of the East Sussex Local Plan Managers Group and the East Sussex Strategic Planning Group, as detailed in Figure 4.	Regular meetings of the Groups are ongoing, in line

Prescribed body or Authority	Summary of key cross boundary matters	Key evidence of co-operation April 2024 to date	Date of last meeting (or if none, date of last correspondence marked “*”)
			with information in Figure 4
Civil Aviation Authority	- Strategic planning matters relating to civil aviation	- No response to request for meeting.	1 Sept 2025* Notification of consultation to draft Local Plan (2026) in January 2026
Cuckmere and Pevensey Levels Catchment Partnership	- Water environment - Biodiversity - Flood risks - Water quality	- RDC attendance at Drought Plan Workshop (21 May 2025) and Partnership meetings	21 May 2025
Eastbourne Borough Council (EBC)	- Meeting housing needs - Meeting gypsy and traveller accommodation needs - Water cycle matters including impacts on Pevensey Levels protected habitats sites - Cross-boundary highway matters	- Invitation from EBC to jointly commission a Water Cycle Study with EBC and Wealden District Council (which RDC has declined) - EBC Representations to Regulation 18 consultation on draft Rother Local Plan (2024) - RDC request to EBC to accommodate unmet needs arising in Rother (2024) and EBC’s response - Both RDC and EBC are members of the East Sussex Local Plan Managers Group	Regular meetings of the Groups are ongoing, in line with information in Figure 4

Prescribed body or Authority	Summary of key cross boundary matters	Key evidence of co-operation April 2024 to date	Date of last meeting (or if none, date of last correspondence marked “*”)
		and the East Sussex Strategic Planning Group, as detailed in Figure 4 - Both RDC and EBC are members of the East Sussex Gypsy, Traveller and Travelling Showpeople (GTTSP) Accommodation Working Group, as detailed in Figure 4 - EBC Representations to Regulation 18 consultation on draft Rother Local Plan (2026) - RDC Representations to Regulation 18 consultation on draft Eastbourne Local Plan (2026) - RDC request to EBC to accommodate unmet needs arising in Rother (2026) and EBC’s response - EBC request to RDC to accommodate unmet needs arising in Rother (2026) and RDC’s response. - EBC representations to Draft Rother Local Plan (2026)	
East Sussex County Council (ESCC)	- Transport, including highways and buses - Rights of Way - Cycling and Walking infrastructure - Education including school place planning	- Regular correspondence and meetings with Highway Authority colleagues in relation to highways impacts of development and transport modelling	07 Sep 2026 (ESCC Highways)

Prescribed body or Authority	Summary of key cross boundary matters	Key evidence of co-operation April 2024 to date	Date of last meeting (or if none, date of last correspondence marked “*”)
	- Public health and wellbeing - Local Nature Recovery Strategy (ESCC is the responsible authority) - Infrastructure Delivery Plan	to support the Local Plan, using county-wide model - RDC is a member of the East Sussex Planning for Health Working Group, led by ESCC - RDC is a supporting authority to, and member of the LNRS working group - RDC representations to the Draft Local Nature Recovery Strategy for East Sussex and Brighton & Hove - RDC annual response to ESCC annual request for information on planned housing to inform Pupil Forecasting - RDC response to consultations on East Sussex Draft Rail Strategy and Draft Freight Strategy - ESCC Representations to Regulation 18 consultation on draft Rother Local Plan (2024) - Both RDC and ESCC are members of the East Sussex Local Plan Managers Group and the East Sussex Strategic Planning Group, as detailed in Figure 4 - ESCC Representations to Regulation 18 consultation on draft Rother Local Plan (2026)	03 Jul 2026 (Education) Regular meetings of the Groups are ongoing, in line with information in Figure 4

Prescribed body or Authority	Summary of key cross boundary matters	Key evidence of co-operation April 2024 to date	Date of last meeting (or if none, date of last correspondence marked “*”)
Environment Agency (EA)	- Flooding, including Strategic Flood Risk Assessment - Proposed site allocations and impact(s) on the Pevensey Levels protected habitats sites - Designation of Coastal Change Management Area in the Local Plan, and EA remit on this - Other water management matters including flood defences, wastewater, drainage and associated infrastructure - Infrastructure Delivery Plan	- EA representations to Regulation 18 consultation on draft Rother Local Plan (2024 and 2026) - Duty to Co-operate meetings - EA comments on emerging Strategic Flood Risk Assessment throughout process	17 Jun 2026
Folkestone and Hythe District Council (FHDC)	- Meeting housing needs - Preparation of a Sustainable Access and Recreation Management Strategy (SARMS) update, to be prepared jointly between the authorities, to address impacts on the Dungeness complex of protected habitats sites - Meeting employment needs - Meeting gypsy and traveller accommodation needs - Cross-boundary highway matters	- RDC request to FHDC to accommodate unmet needs arising in Rother and FHDC’s reply (2026) - FHDC representations to Regulation 18 consultation on draft Rother Local Plan (2024) - FHDC representations to Regulation 18 consultation on draft Rother Local Plan (2026) - Duty to co-operate meetings - Regular meetings to discuss SARMS update	20 Aug 2026
Hastings Borough Council (HBC)	- Meeting housing needs - Meeting employment needs	- Duty to co-operate / cooperation meetings	7 Oct 2026

Prescribed body or Authority	Summary of key cross boundary matters	Key evidence of co-operation April 2024 to date	Date of last meeting (or if none, date of last correspondence marked “*”)
	- Meeting gypsy and traveller accommodation needs - Cross-boundary highway matters - Potential development sites/ extant and emerging site allocations particularly those located in proximity to the district/borough boundary - Strategic gap - Combe Valley Countryside Park, included protected habitats sites - Hastings Country Park and Nature reserve, including protected habitats sites - Water issues, including flood risks, impacts on water and wastewater and their infrastructure - Coastal change and land instability - Coastal Change Management Area - Infrastructure Delivery Plan	- Joint meetings, also with others, to discuss cross-boundary site allocations - Requests and responses between both authorities for assistance with meeting housing needs - HBC representations to Regulation 18 consultation on draft Rother Local Plan (2024 and 2026) - RDC representations to Regulation 18 consultation on draft Hastings Local Plan (2026) - HBC request for RDC to assist in meeting gypsy and traveller site need and RDC’s response - Both RDC and HBC are members of the East Sussex Local Plan Managers Group, the East Sussex Strategic Planning Group, and the East Sussex Gypsy, Traveller and Travelling Showpeople (GTTSP) Accommodation Working Group, as detailed in Figure 4 - Joint commissioning and preparation of evidence base documents (Housing and Economic Development Needs Assessment update, Tourism and Visitor Accommodation Study, Playing Pitch	

Prescribed body or Authority	Summary of key cross boundary matters	Key evidence of co-operation April 2024 to date	Date of last meeting (or if none, date of last correspondence marked “*”)
		Strategy and Built Facilities Strategy - Stage E Review)	
High Weald National Landscape (HWNL) Unit	- Furthering the statutory purpose of the High Weald National Landscape - Effects of development and proposed site allocations on the National Landscape - Evidence base on HWNL to support Local Plan policies	- Meeting to discuss proposed site allocations - RDC attendance of meetings of the High Weald Joint Advisory Committee and the High Weald Officer Steering Group, as detailed in Figure 4	22 September 2026 (officer steering group)
Historic England (HE)	- Emerging site allocations and implications for historic environment - Evidence base on historic environment to support Local Plan policies	- HE Representations to Regulation 18 consultation on draft Rother Local Plan (2024 and 2026) - Duty to cooperate meeting	22 Oct 2025 Representations to draft Rother Local Plan received March 2026
Homes England	- Development sites - Meeting housing need, including affordable housing	- Homes England Representations to Regulation 18 consultation on draft Rother Local Plan (2024 and 2026) - Meetings to discuss individual sites (extant and proposed site allocations) - Attendance at Rother Housing Development Event 28/11/25	24 Sep 2026
Kent County Council (KCC)	- Meeting housing need - Cross-boundary transport matters - Cross-boundary education matters	- KCC Representations to Regulation 18 consultation on draft Rother Local Plan (2024 and 2026)	7 Sep 2026

Prescribed body or Authority	Summary of key cross boundary matters	Key evidence of co-operation April 2024 to date	Date of last meeting (or if none, date of last correspondence marked “*”)
	- Cross-boundary Rights of Way matters - Cross-boundary environmental matters, e.g. Dungeness Complex of protected habitats sites - Transport matter - Infrastructure Delivery Plan	- Officer meeting	
Lewes District Council (LDC)	- Meeting housing needs - Meeting gypsy and traveller accommodation needs - Cross-boundary highway matters	- LDC Representations to Regulation 18 consultation on draft Rother Local Plan (2024) - RDC Representations to Regulation 18 consultation on draft Lewes Local Plan (2025) - RDC request to LDC to accommodate unmet needs arising in Rother (2024 and 2026) and LDC’s response - Both RDC and LDC are members of the East Sussex Local Plan Managers Group, the East Sussex Strategic Planning Group, and the East Sussex Gypsy, Traveller and Travelling Showpeople (GTTSP) Accommodation Working Group, as detailed in Figure 4	Regular meetings of the Groups are ongoing, in line with information in Figure 4
Marine Management Organisation (MMO)	- South Inshore and Offshore Marine Plan - how to ensure this is adequately addressed by the Local Plan	- MMO Representations to Regulation 18 consultation on draft Rother Local Plan (2024)	2 Oct 2025

Prescribed body or Authority	Summary of key cross boundary matters	Key evidence of co-operation April 2024 to date	Date of last meeting (or if none, date of last correspondence marked “*”)
	- Designation of Coastal Change Management Area in the Local Plan - Dungeness Complex of protected habitats sites	- Duty to cooperate meeting	Notification of consultation to draft Local Plan (2026) in January 2026
National Highways (NH)	- Circular 0/2022 and NPPF vision-led approach to transport planning – how to ensure this is adequately addressed by the Local Plan - Transport modelling for the Local Plan and engagement with National Highways and ESCC to ensure robust evidence (including involvement as critical friend, e.g. reviewing brief, scoping, modelling inputs, etc.) - Draft Infrastructure Delivery Plan and opportunities for National Highways to input into the evidence - Funding mechanisms and National Highways role/remit and expectations - Infrastructure Delivery Plan	- Duty to cooperate meeting - Joint meetings with ESCC to discuss Local Plan transport modelling work - NH Representations to Regulation 18 consultation on draft Rother Local Plan (2024 and 2026) - NH response to RDC request for site-specific comments to inform draft site allocations	04 Aug 2026
Natural England	- Protected habitats sites - Local Plan Habitats Regulations Assessment advice - High Weald National Landscape - Sustainable Access and Recreation Management Strategy (SARMS) update	- NE Representations to Regulation 18 consultation on draft Rother Local Plan (2024 and 2026) - Duty to cooperate meeting - Meetings on specific issues and sites, e.g. Sustainable Access and Recreation	20 Aug 2026

Prescribed body or Authority	Summary of key cross boundary matters	Key evidence of co-operation April 2024 to date	Date of last meeting (or if none, date of last correspondence marked “*”)
		Management Strategy (SARMS) update, with FHDC	
NHS England / NHS Integrated Care Board	- Healthcare facilities, requirements and provision - Public health - Infrastructure Delivery Plan	- NHS Sussex and NHS Property Services Representations to Regulation 18 consultation on draft Rother Local Plan (2024 and 2026)	15 June 2026
Office of Road and Rail	- Strategic Road Network - Railway safety	- No response to request for meeting	1 Sep 2025* Notification of consultation to draft Local Plan (2026) in January 2026
South Downs National Park Authority (SDNPA)	- Meeting housing needs - Meeting gypsy and traveller accommodation needs - Cross-boundary highway matters	- Both RDC and SDNPA are members of the East Sussex Local Plan Managers Group, the East Sussex Strategic Planning Group, and the East Sussex Gypsy, Traveller and Travelling Showpeople (GTTSP) Accommodation Working Group, as detailed in Figure 4 - RDC response to SDNPA’s request for help with meeting unmet housing and gypsy and traveller site need (Jan 2026)	Regular meetings of the Groups are ongoing, in line with information in Figure 4

Prescribed body or Authority	Summary of key cross boundary matters	Key evidence of co-operation April 2024 to date	Date of last meeting (or if none, date of last correspondence marked “*”)
South East Local Enterprise Partnership	- Confirmation that SELEP ceased operations in April 2024, received on 12 Sept 2025 - SELEP main functions (strategic economic planning, delivery of government programmes, business representation) absorbed by ESCC	- Not applicable as SELEP has ceased operations.	12 Sep 2025*
Sport England	- Playing Pitch Strategy and Stage E Review - Impact of development and site allocations on playing fields and pitches	- Meetings on the Playing Pitch Strategy and Built Facilities Strategy - Stage E Review, also with HBC - Sport England Representations to Regulation 18 consultation on draft Rother Local Plan (2024 and 2026)	28 Sep 2026
Sussex Nature Partnership	- Emerging Sussex Local Nature Recovery Strategy - Biodiversity issues in relation to emerging Local Plan policies and site allocations, including effects on habitats, protected sites and protected species	- Sussex Nature Partnership, as part of Local Nature Recovery Strategy Working Group; with RDC part of Working Group and Supporting Authorities Group - Monthly webinar series on nature conservation matters in relation to planning	Regular meetings of the LNRS Groups are ongoing, in line with information in Figure 4
Tunbridge Wells Borough Council (TWBC)	- Transport matters, including modelling for the Local Plan - Meeting housing needs - Meeting employment needs - Meeting gypsy and traveller accommodation needs	- Duty to Cooperate meetings - TWBC Representations to Regulation 18 consultation on draft Rother Local Plan (2024 and 2026)	16 Jun 2026

Prescribed body or Authority	Summary of key cross boundary matters	Key evidence of co-operation April 2024 to date	Date of last meeting (or if none, date of last correspondence marked “*”)
	- Bewl Water - Rother Local Plan draft site allocations, especially sites in proximity to district/borough boundary (e.g. at Flimwell) - Infrastructure Delivery Plan	- RDC Representations to TWBC’s consultation on Main Modifications (2025) - RDC request to TWBC to accommodate unmet needs arising in Rother (2024 and 2026) and TWBC’s response	
Wealden District Council (WDC)	- Transport matters, including modelling for the Local Plan - Meeting housing needs - Meeting employment needs - Meeting gypsy and traveller accommodation needs - Site allocations including sites in proximity to the district boundary - Water cycle matters including invitation to jointly commission a Water Cycle Study (which RDC has declined) - Bewl Water - HRA matters including Pevensey Levels and Ashdown Forest - Designation of Coastal Change Management Area(s)	- Duty to Cooperate meetings - WDC Representations to Regulation 18 consultation on draft Rother Local Plan (2024 and 2026) - RDC Representations to WDC’s Regulation 18 consultation on draft Wealden Local Plan (2024 and 2026) - RDC request to WDC to accommodate unmet needs arising in Rother (2024 and 2026) and WDC’s response - Both RDC and WDC are members of the East Sussex Local Plan Managers Group, the East Sussex Strategic Planning Group, and the East Sussex Gypsy, Traveller and Travelling Showpeople (GTTSP) Accommodation Working Group, as detailed in Figure 4	12 May 2026

Prescribed body or Authority	Summary of key cross boundary matters	Key evidence of co-operation April 2024 to date	Date of last meeting (or if none, date of last correspondence marked “*”)
Infrastructure providers and related stakeholders (as identified in the Infrastructure Delivery Plan).	- Timely delivery of infrastructure to support levels of growth planned in Rother, as set out in the adopted and emerging Local Plan - Infrastructure funding, including funding mechanisms (CIL and S106) - Infrastructure Delivery Plan	- Representations to Regulation 18 consultation on draft Rother Local Plan from stakeholders, including: Environment Agency, East Sussex County Council, Marine Management Organisation, National Grid, National Highways, Network Rail, NHS, Southern Water, South East Water, Sport England - Meetings held with some stakeholders as part of Working Groups, as detailed in Figure 4. - Engagement with stakeholders has informed the latest IDP.	23 Jun 2026 (South East Water) 04 Jun 2026 (Southern Water) 25 Aug 2026* (Network Rail)

4. Progress and outcomes to-date

4.1. The following table sets out the Council’s progress on cooperation with relevant bodies on the key strategic planning and related cross-boundary matters identified in Section 2 of this report. Throughout the plan process, the Council has sought to engage positively and constructively with key stakeholders to understand key strategic and cross-boundary issues as well as approaches to addressing these.

However, there are instances where the Council understands there to be outstanding matters on selected topics, or areas of disagreement between itself and other bodies, and these are signposted in the table.

4.2. This table provides an overview of the strategic matters and associated cooperation carried out during the plan process. For completeness, the table should be read together other sections of this report, published Statements of Common Ground and Local Plan Consultation Reports.

Figure 6 (Part A) - Record of progress and cooperation on key strategic cross-boundary matters

Strategic matter	Key relevant bodies	Summary	Overview of key actions and outcomes	Outstanding matters or areas of disagreement ³
Meeting housing needs (quantum)	Neighbouring and other local authorities	From the early stages of the plan process, RDC has identified that it will be unlikely to meet the Government's Local Housing Need (LHN) figure in full for the district, informed by the Rother Housing and Economic Land Availability Assessment.	RDC has sought the assistance of neighbouring and other authority areas to assist with meeting unmet housing need arising in Rother. This includes formal letters sent to respective authorities and discussions between officers in meetings. To-date, there are no authorities in a position to assist Rother in this respect.	Neighbouring and other local authorities have confirmed that they are unable to assist in accommodating any unmet housing needs arising in Rother.
Meeting housing needs in the	Hastings Borough Council	Rother district and Hastings borough share a Housing	RDC and HBC jointly commissioned a Housing and	None.

³ This is Rother District Council's understanding of those matters and areas of disagreement with relevant bodies on the strategic matter(s), at the Regulation 19 publication stage of plan process. It is accepted that new matters, areas of disagreement and/or resolutions/agreements may arise through the statutory consultation.

Housing Market Area (housing tenure and type)		Market Area, which necessitates consideration during the preparation of the plan.	Economic Development Needs Assessment (HEDNA), which has informed the preparation of the respective Local Plans. RDC and HBC have consulted each other on their emerging plan proposals.	
Meeting accommodation needs of gypsies, travellers and travelling showpeople	East Sussex local authorities	The Local Plan must identify and meet the needs of this group, in line with national planning policy.	RDC and other East Sussex Authorities jointly commissioned a Gypsy and Traveller Needs Assessment (GTAA). RDC has made provisions in the Pre-submission Local Plan to meet the district's identified needs in full, based on the 2022 GTAA. An update to the 2022 assessment is pending at the time of the Regulation 19 publication of the Rother Local Plan.	Continued cooperation on preparation of the update to the joint GTAA, and any further actions between East Sussex authorities pending outcomes of the study.
Meeting economic development needs in the Functional Economic Market area	Hastings Borough Council	Rother district and Hastings borough share a Functional Economic Market Area, which necessitates consideration during the preparation of the plan.	RDC and HBC jointly commissioned a Housing and Economic Development Needs Assessment (HEDNA), as well as a Tourism and Visitor Accommodation Study, which has informed the preparation of the authorities' respective. RDC has separately prepared a Retail and Town Centre Uses	None.

			Study, which has considered impacts on a wider retail catchment basis. RDC and HBC have consulted each other on their emerging plan.	
Furthering the purpose of the High Weald National Landscape (HWNL).	Natural England, High Weald National Landscape Unit	RDC has a statutory duty to seek to further the purposes of the High Weald National Landscape, in line with the Section 245 of the Levelling Up and Regeneration Act 2023. Some 83% of Rother district is within the HWNL.	RDC has engaged and consulted with Natural England and the HWNL Unit during the preparation of the plan. The HWNL Unit have raised objections on the basis of harm to the HWNL. Following which, RDC has commissioned an independent Landscape Sensitivity Testing study to inform the Local Plan, and particularly site allocations. Natural England have not raised objections on this matter during formal consultations.	The HWNL Unit objects to overall level of growth planned and a number of the site allocation proposals. Natural England's latest position is pending review of the Pre-submission Local Plan.
Protecting and enhancing biodiversity	Natural England, Folkestone & Hythe District Council	In line with planning legislation, RDC must carry out a Habitats Regulations Assessment (HRA) and where necessary an Appropriate Assessment to inform the Local Plan, to identify whether it would result in adverse effects on the integrity of habitats sites. Some 7% of the district contains	RDC has prepared HRA reports during the plan process and engaged and consulted with Natural England on this work. Evidence indicates there are likely to be adverse impacts on the Dungeness Complex of Habitats Sites owing to recreational pressure, but which could be mitigated	Continued cooperation on preparation and implementation of the update to the joint SARMS, and any further actions between Natural England and F&HDC pending outcomes of the strategy.

		internationally or nationally protected habitats sites.	through a Sustainable Access and Recreation Management Strategy (SARMS). To address this, RDC has worked jointly with F&HDC on the preparation and implementation of a SARMS.	
Protecting and enhancing biodiversity	East Sussex County Council, Sussex Nature Partnership, East Sussex local authorities, Brighton & Hove City Council, Natural England	The Local Plan must set out the strategic approach to conserving and enhancing the natural environment, and supporting nature recovery, in line with legislation and national planning policy.	Rother is a Supporting Authority and member of Working Group on the East Sussex and Brighton & Hove Local Nature Recovery Strategy. The Local Plan includes policies that help give effect to this strategy. ESCC (Ecology) has provided feedback to inform the preparation of the Local Plan, including site allocation policies. In response to Regulation 18 consultation feedback, RDC has prepared a Green and Blue Infrastructure Framework study, applying the Natural England 'Green Infrastructure Framework'.	Continued cooperation on the implementation of the Local Nature Recovery Strategy.
Protecting and enhancing biodiversity and open space	Sport England, Hastings Borough	In line with national planning policy, the Local Plan must include policies that are based on robust and up-to-date assessments of the need for	RDC and HBC have jointly prepared a Playing Pitches and Built Facilities Strategy 2023. Sport England have identified that a Stage E Review of the	Sport England seek to ensure that RDC and HBC continue work on the Stage E Review.

	Council, Sporting Bodies ⁴	open space, sport and recreation facilities.	study is required. RDC and HBC have commenced work on this, however delays have arisen owing to feedback required from relevant sporting bodies, which is outstanding. Sport England have acknowledged the work on the Stage E Review and are content with progress to-date.	
Conserving and enhancing the historic environment	Historic England, ESCC	The Local Plan must set a positive framework for the conservation and enjoyment of the historic environment, whilst ensuring that new development conserves or enhances the significance of heritage assets and their setting, in line with national planning policy and legislation.	The Council has engaged and consulted with Natural England during the plan process, taking account of representations received. ESCC maintains the Historic Environment Record for East Sussex, and this has been used to inform the preparation of the Local Plan. ESCC has also provided representations on archaeological assets, which have informed the site allocation policies. RDC has also engaged a Conservation Officer to inform and review the plan proposals.	None.

⁴ There are a wide range of relevant Sporting Bodies for the respective authority areas, covering different sports and recreational activities (e.g. England Cricket Board)

Coastal change and marine management	Marine Management Organisation, Environment Agency, Neighbouring authorities (coastal)	As Rother is a coastal area, national planning policies regarding coastal management apply. These require that Local Plans and planning decisions should take account of the UK Marine Policy Statement and marine plans. It also supports integrated coastal zone management across local authority and land/sea boundaries.	The Council has engaged and consulted with the MMO and EA during the plan process. Representations received have been used to inform the preparation of the Local Plan. This includes strategic approaches to flood risk management and the proposed designation and extent of the Coastal Change Management Area, which will help give effect to the Marine Policy Statement and the South Inshore and Offshore Marine Plan. The Council has also engaged with neighbouring coastal authorities to understand their approaches to the designation of the CCMA in their respective areas.	None.
Climate resilience including Flood Risk Management	Environment Agency, East Sussex County Council, Water Companies	National planning policy provides that the Local Plan must consider flood risk from all sources, particularly as part of the development strategy and allocation of land for development. It sets parameters for a sequential, risk-based approach to the location of development –	RDC has engaged with the EA and other bodies on the preparation of the Strategic Flood Risk Assessment, as well as consulted the EA and other bodies during the preparation of the Local Plan. This has ensured the SFRA is appropriate in scope, having regard to national planning	None.

		taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property.	policy and guidance, and is informed by appropriate and up-to-date information. Feedback from the EA and other bodies have been incorporated into the SFRA. In addition, consultation feedback from the EA and MMO has been considered and used to update the draft Local Plan policies.	
Sustainable Transport and Movement	ESCC, National Highways, Active Travel England, Network Rail, Office of Road and Rail	National planning policies provide that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. The Local Plan must use a 'vision-led' approach to identify transport solutions, and this should be applied at the early stage of the plan process.	RDC has engaged and formally consulted with the relevant bodies to inform the Local Plan. Feedback has, in particular, ensured the Regulation 19 Local Plan has a greater focus and policies giving effect to the vision-led approach to transport, compared to earlier Regulation 18 draft plans. ESCC and National Highways have been engaged in transport modelling, as set out in this table. This evidence base has informed site allocations, including transport mitigation measures. ESCC has commented on site allocation policies in its capacity as highway authority, which have	Matters will be pending the relevant transport bodies' assessment of Reg19 sites; and updated local plan proposals re vision led approach to transport

			been considered. RDC has also inputted into higher-level plans, which in turn will be given effect in the Local Plan, such as the Local Transport Plan and the Local Cycling Walking Implementation Plan.	
Sustainable Transport and Movement	ESCC, National Highways, Kent County Council	Transport Assessment and associated modelling to consider the impact of Local Plan proposals on the highway network, and inform the development strategy and potential mitigation measures required.	RDC worked with National Highways and ESCC, as the highway authority, to agree the scope of Transport Assessment. RDC also worked with ESCC to undertake the modelling work, using the ESCC county-wide model. Kent County Council were engaged to discuss potential cross-boundary implications on the highway network.	Matters will be pending National Highways review of final Transport Assessment, and additional cross-boundary considerations with neighbouring authorities including Kent County Council.
Strategic infrastructure to support growth	Statutory consultation bodies including infrastructure delivery providers	The Infrastructure Delivery Plan (IDP) is a companion document to the Local Plan which has informed and will help to support its implementation. This sets out the infrastructure required to support planned growth.	RDC has engaged with a wide range of statutory consultees and infrastructure providers / deliver partners to prepare a new IDP, as well as to inform the preparation of Local Plan policies including requirements for site allocations. See further details in the table below.	Matters may be identified through the delivery and monitoring of the Local Plan and IDP over the plan period.
Sustainable communities	ESCC	Health Impact Assessment to inform the preparation of the Local Plan.	RDC engaged with ESCC (Healthy Places Team) on the methodology for the Health	None.

			Impact Assessment, which was integrated with the Sustainability Appraisal process.	
Sustainable communities	Hastings Borough Council, Wealden District Council	Where site allocations are located near Rother's administrative boundaries, it is important to consider their relationship and potential impacts on neighbouring authorities.	RDC have engaged with adjoining authorities on the preparation of site allocations, including through officer level meetings and formal consultations. This has helped to ensure consideration of cross-boundary implications and impacts during the plan process, for example, on infrastructure.	Continued cooperation on cross-boundary site allocations.
Sustainably managing minerals and waste	ESCC	ESCC is the responsible authority for preparing Minerals and Waste Plans, which form part of Rother's statutory development plan, alongside the Local Plan.	RDC has sought to ensure that the ESCC Minerals and Waste Plans are not prejudiced by the Local Plan, and consulted with ESCC as the Mineral Planning Authority. There are specific policies in the Local Plan to address this including ENV16 Combe Valley Countryside Park, BX37 (Land West of Ninfield Road), RH2 (Harbour Road Employment Area), GYP3 (Land adjacent to Fir Tree Cottage), GYP5 (Land adjacent to Valentine Ridge).	None.

Figure 6 (Part B) - Record of progress and cooperation on strategic infrastructure

Strategic infrastructure matter	Key bodies engaged with	Summary of progress	Overview of key actions and outcomes	Outstanding matters or areas of disagreement ⁵
Transport Strategic Road Network Capacity & Safety; Local highways network & mitigation; Monitor & Manage framework Active Travel; Public Transport; Strategic Corridor; Funding	ESCC, National Highways, Kent County Council, Hastings Borough Council	■ RDC & ESCC have progressed transport evidence from the earlier STEB to the full County Wide Transport Model (CTWM). Multiple spatial options were modelled to inform the Local Plan strategy. A refined appraisal was undertaken in July 2026 to match the final Reg19 allocations, accompanied by sensitivity tests on model shift and IDP physical mitigations. ■ RDC & ESCC engaged NH early to review the CTWM output, NH confirmed in Aug 2026 that there were no immediate "red flags" or grounds for plan unsoundness, provided highway safety is prioritised, and a robust policy framework is established.	■ Agreement on the "Monitor and Manage" (M&M) Delivery Framework. This was reflected in the Reg 19 LP policies. ■ Recognition that NH will not fund or lead Local Plan SRN mitigations; these must be developer-funded and delivered via S278. ■ West Bexhill Link Road / multi-modal corridor will not be pursued within the plan period due to insufficient development quantum ■ ESCC raised no objection to the level of growth, and there is no outstanding disagreement, but ongoing technical works remain to be completed regarding cross boundary assessment, wider cumulative impacts, and finalised mitigations.	Outstanding transport matters with National Highways: ■ Completion of secondary modelling and sensitivity testing ■ Site specific SRN access evidence Outstanding transport matters with KCC: ■ Scoping and potentially commissioning of joint modelling to determine cross-boundary impacts into Kent.

⁵ This is Rother District Council's understanding of those matters and areas of disagreement with relevant bodies on the strategic matter(s), at the Regulation 19 publication stage of plan process. It is accepted that new matters, areas of disagreement and/or resolutions/agreements may arise through the statutory consultation.

Strategic infrastructure matter	Key bodies engaged with	Summary of progress	Overview of key actions and outcomes	Outstanding matters or areas of disagreement ⁵
		■ RDC& ESCC engaged with KCC to discuss and assess the potential traffic & capacity impacts of northern Rother allocations on some junctions in Kent. ■ RDC & ESCC & HBC maintain constructive discussion regarding cumulative impacts on strategic corridors (specifically the A259 and links to the A21).	■ The Transport Assessment, using CWTM, will assess cumulative impacts across both Hastings and Rother, and wider impacts outside Rother. ■ Draft SoCG with ESCC to be signed off.	
Active Travel	ESCC, Hastings Borough Council, Network Rail, Active Travel England	■ RDC maintained ongoing cross-boundary liaison with ESCC & HBC regarding LCWIP route alignment and cumulative transport impacts. ■ RDC reached out to Network Rail who confirmed that it has no plans to develop a new rail stations or halts either at Glyne Gap/ Ravenside or The Wiltings, as previously raised. ■ IDP was updated to reflect ESCC's comments.	■ RDC, HBC, and ESCC are coordinating the alignment of the Local Cycling and Walking Infrastructure Plan (LCWIP) network across the Rother–Hastings boundary (particularly between Bexhill and Hastings) ■ No areas of disagreement raised at this stage.	None.
Education	ESCC	■ RDC engaged with ESCC to discuss education provision to	■ Agreement on policy support for new primary	None.

Strategic infrastructure matter	Key bodies engaged with	Summary of progress	Overview of key actions and outcomes	Outstanding matters or areas of disagreement ⁵
Primary & EYCC; Secondary schools Special education needs & disabilities (SEND); Funding		support Reg19 allocations in Rother ■ IDP was updated to reflect ESCC's comments. ■ RDC's Reg19 housing trajectory shared with ESCC for modelling	school with integrated EYCC provision across Bexhill. ■ Recognition of potential impacts on secondary school places which will be monitored by ESCC and funded via developers contributions. ■ Recognition of growing demand for SEND which will be monitored by ESCC and funded via CIL as necessary. ■ Draft SoCG with ESCC to be signed off.	
Health and social care Primary care & community healthcare capacity; Alignment with Trajectory; Site specific mitigations; Funding	NHS Sussex Integrated Care Board (ICB)	■ RDC engaged NHS Sussex ICB to discuss Reg18 comments and agree on data inputs required for Reg19 and IDP. ■ RDC's Reg19 housing trajectory shared with NHS for modelling ■ IDP was updated to reflect NHS' comments.	■ Draft SoCG with NHS circulated for review. ■ NHS to provide updated positions	Outstanding matters with NHS are as follows: ■ NHS objects to the overall housing target unless "firm commitments" are secured to ensure primary care provision is delivered in parallel with housing. ■ RDC's position is maintained that: (1) commitments at Local Plan stage take the form of site specific policies requirements and the schedule in the IDP, and that (2) RDC cannot introduce further

Strategic infrastructure matter	Key bodies engaged with	Summary of progress	Overview of key actions and outcomes	Outstanding matters or areas of disagreement ⁵
				commitments without NHS' input identifying the need for new facilities & project details (costings, timescales, etc). ■ NHS considers that the impact of employment growth on primary healthcare capacity is not adequately addressed. ■ RDC's position is any healthcare impacts arising from employment growth must be identified by NHS as the responsible statutory body, and RDC requests NHS' input on the matter.
Water management (including drainage) Potable water supply; Wastewater & sewer network; Water demand; Surface water & groundwater protection;	Southern Water South East Water	■ RDC held meetings with Southern Water and South East Water (individually) to discuss their Reg18 reps and to refine the IDP. ■ RDC's Reg19 housing trajectory and allocation GIS shared with Southern Water & South East Water for modelling . ■ LP policies were updated to address both undertakers' comments.	■ Draft SoCG with Southern Water circulated for review. ■ Draft SoCG with South East Water circulated for review. ■ Southern Water raised no objection to proposed housing growth ■ RDC's viability testing to test different water efficiency standards as discussed	Outstanding matters with Southern Water: ■ Southern Water considered a lower water efficiency standards (80l/p/d) is achievable ■ RDC maintain that the Local Plan can only mandate water efficiency standards which are demonstrably viable, as justified by the whole Plan viability assessment.

Strategic infrastructure matter	Key bodies engaged with	Summary of progress	Overview of key actions and outcomes	Outstanding matters or areas of disagreement ⁵
Asset safeguarding		■ IDP was updated to reflect Southern Water and South East Water's comments.		Outstanding matters with South East Water: ■ Objection to planned housing quantum due to water resource constraint ■ To address this objection, SEW to model future supply-demand using RDC's trajectory data. RDC to consider stepped trajectories and demand management. Both parties recognise the issue is subject to national discussions via DEFRA Water Delivery Taskforce.
Environmental infrastructure Flood risk management & defence; Functional floodplain; Water quality, waste water & drainage;	Environment Agency	■ RDC engaged EA to discuss its various comments regarding water quality, flood risk, env protection, GBI study, & SA	■ Level 1 SFRA produced. Scoping for the Level 2 SFRA commenced, agreement to share draft information with EA for technical review. ■ IDP was updated to reflect EA's comments ■ Regulation 19 Policies updated to reflect EA's comments on drainage, tidal defence protection, WFD & designated habitat protection,	Outstanding matters with EA: ■ Pending EA review of Regulation 19 Local Plan and final evidence base documents, including Flood Risk Sequential and Exception Tests

Strategic infrastructure matter	Key bodies engaged with	Summary of progress	Overview of key actions and outcomes	Outstanding matters or areas of disagreement ⁵
Estuarine flood compensation & land raising; GBI; Groundwater protection			estuarine flood compensation, requirements on contaminated land. ■ Draft SoCG with EA circulated for review.	



Rother District Council

Town Hall

London Road

Bexhill-on-Sea

East Sussex

TN39 3JX