

16th July 2024

Dear Sir or Madam,

Rother District Council Local Plan 2020 to 2040

NHS Sussex welcomes the opportunity to comment on the [Draft Local Plan 2020-2040 – Rother District Council](#)

Specific comments relating to proposed actions are set out later in this letter.

NHS Sussex recognises the importance of collaborative working to address health inequalities and improve our population health and well-being. We are working together with our Integrated Care System partners to develop integrated health and care approaches aimed at improving the lives of local people by supporting them to live healthier for longer and making sure they have access to the best possible help when they need it.

Our strategic approach is set out in Improving Lives Together our integrated care strategy, [Our strategy - Sussex Health & Care \(ics.nhs.uk\)](#). This strategy includes an East Sussex placed based focus which identifies that in order to support improved population health and therefore the years of life people spend in good health, we need to link strongly with the work of partner organisations who can impact on the wider determinants of health and address health inequalities.

NHS Sussex looks forward to continuing our collaborative work with Rother District Council (RDC), which for example has recently included the development of Rother's Integrated Community Team (ICT), the development of Bexhill's 54-bed mental health hospital, the proposal for the new GP practice at Barnhorn Road, Bexhill and other GP practices' estates requirements in Bexhill and Rural Rother. These initiatives lead on from RDC's much welcomed involvement in our Healthy Hastings and Rother Programme and the local NHS' participation in Rother's Local Strategic Partnership, Safer Hastings and Rother Partnership and the Connecting Hastings and Rother Together initiative. In addition, we have collaborated on joint work to support vulnerable population groups such as rough sleepers, the setting up of the Rother Community Hub as part of the local Covid-19 response and the review in 2022/23 of local Welfare Benefits Advice services.

In relation to the Draft Local Plan, we provide the following feedback:

1. The Plan is set out in several sections which support the Health and Care system's aims to improve the health and wellbeing of the local population, address health inequalities and address wider health determinants namely:
 - Environment
 - Housing
 - Healthy lifestyles
 - Infrastructure
 - Economy
2. The two core themes of Green to the Core and Live Well Locally are both appropriate to support these sections. In particular, the Live Well Locally concept and the goal of creating healthy, sustainable and inclusive communities that support residents across the all ages, abilities and backgrounds to be able to access their daily needs (housing, work, food, health, education and culture and leisure) is positive. Creating connected communities can enable people to Live Well Locally and improve health and wellbeing through better air quality, more physical activity, greater nature connection and social interaction.
3. Delivering carbon reduction and adaptation to climate change and responding to the locally declared 'Climate Emergency'.
 - Measures to encourage walking and cycling as part of an approach to develop greater travel choice are important to the health and wellbeing of local people. We therefore support plans to encourage local people to be more active and use sustainable forms of transport. It would be helpful to take into account local NHS facilities such as GP practices, community health facilities and the local hospitals when considering these travel choice options and to work with NHS Sussex, the Rural Rother and Bexhill Primary Care Networks, East Sussex Healthcare NHS Trust, Sussex Partnership NHS Foundation NHS Trust in their development.
 - We support the inclusion of action to protect, conserve and enhance outdoor spaces that promote positive physical and mental wellbeing for the public.
4. Meeting the demand and need for housing (including affordable and specialist need).
 - Good health depends on having homes that are safe and free from physical hazards. In contrast, poor quality and inadequate housing contributes to health problems such as chronic diseases and can have harmful effects on childhood development.
 - Rother's population is living longer meaning that there will be an increased need for specialist adapted accommodation particularly for people with complex health and care needs.
 - NHS Sussex supports actions to advise and help those at risk of homelessness to sustain their accommodation, to relieve homelessness by improving access to the

private rented sector and to support the most vulnerable households with multiple and complex support needs to access accommodation through multi-agency service delivery.

5. Securing economic improvement through the development of the Rother economy.

- NHS Sussex acknowledges the link between deprivation, economic growth, education, skills and employment and exclusion and health outcomes. The positive impact that health has on economic growth and poverty reduction, occurs through less worker illness, increased productivity, lower absenteeism rates and improved learning among school children and adults, higher incomes and improved housing accessibility.
- Growing and supporting Sussex's health and care workforce is essential to the Improving Lives Together ambition to support our local people to live healthier for longer and access the best possible services when they need them. We have identified three main workforce challenges of retaining staff, recruiting new staff and developing staff skills. Therefore, better access to employment and skills development across the district is essential, noting the specific need to support rural economies and communities.

6. Delivering district-wide and neighbourhood infrastructure to support growth and strengthening the sustainability of settlements and communities.

- The need for good accessibility to healthcare facilities and support systems which meet all society's needs is an essential element of a system wide approach.
- We note that the Draft Local Plan details a number of specific development areas within the District and that within the Infrastructure Delivery Plan (IDP) several health and care facility developments are included, developed in partnership with the NHS. We welcome this opportunity to capture schemes already being worked-up with Rother District Council and one in progress, to include in the Council's IDP.

Currently, GP services in the District are at capacity in terms of infrastructure. Provision of NHS care is good and the existing GP providers have a good Care Quality Commission rating. To protect these services going forward, NHS Sussex recommends a standard approach where new housing is in progress to have CIL and / or additional local council support to aid residents in the Rother District.

For the Rother IDP period, the objective and proportionate needs include 3 projects of strategic need:

- i) Robertsbridge Health Centre (new premises build) - Currently £1.1m CIL awarded to support the new Health Centre. Funds required are circa £2.6m and that gap is being pursued. At the same time, the NHS business case is in progress for this needed infrastructure provision

- ii) Barnhorn Road, Bexhill (new GP premises) - Bexhill has the highest volume of new homes planned and in progress. NHS funds have achieved a new Diagnostic Centre. The population require 2 new GP practice sites (so as to support resident access) – Barnhorn Road is one project. It is envisaged £4.2m of the Levelling Up funding will be utilised to achieve this required premises.
- iii) Beeching Road, Bexhill (new GP premises) - this site will work alongside Barnhorn Road so as to provide infrastructure required to support the new housing. To optimise care, the aim for this project is to merge 2 old GP sites into 1 new premises solution. The housing growth has meant that the older “house” style GP services no longer meet the growing population. A premises that can support the new residents is now required – which is a circa £10.4m CIL fund request.

This infrastructure is directly in proportion to the housing growth in the district. In the IDP, the housing volume has a range on 2,136 (lower end) to 3,398 (upper end) dwellings. Every new home will require the home dwellers to register at a GP practice. Without the 3 new infrastructure premises, additional residents will not be able to register for GP services as the existing older premises cannot support the housing planned volume.

All projects are essential and align to the following 3 key tests of CIL and infrastructure:

- a) The NHS requirement is necessary with regard to planning.
Current GP premises are at capacity
- b) The proposals are directly related.
The infrastructure need is only required and is directly related to the housing growth volumes
- c) Fair and reasonable based on scale of housing.
The 3 projects only support the key housing areas where the demand is centred. The fund request is only based on premises size required.
The NHS will fund the workforce required to support the related populations / home occupiers.

In addition to this infrastructure request NHS Sussex has committed the following additional services and infrastructure to support the residents of Rother:

- Bexhill’s new Diagnostic Centre that was completed in 2023. As noted in the CIL fund section, the NHS resources are aligned to key growth areas.
- Bexhill’s new 54-bed mental health hospital which will be completed in 2024/25.
- In excess of 100 whole time equivalent new clinical posts

NHS Sussex would welcome a discussion about opportunities for joint working that maybe available through Section 106 funding. This will enable an integrated approach to the infrastructure needed to support new developments, including health infrastructure, and to mitigate any impacts arising from the development.

Please continue to liaise with Sophie Sneddon (NHS Sussex's Deputy Director of Estates and Facilities – sophie.sneddon@nhs.net) on this section of the plan.

7. Planning for physical and mental health and wellbeing by supporting strong, safe and sustainable communities, with a community-led focus and promoting healthier lifestyles.

- NHS Sussex supports connecting health and wellbeing opportunities through use of open and green spaces for local people of all ages (noting the need to provide safeguards for certain groups such as children) that maximises health and wellbeing in a way that is easy to access and free.
- In addition, developing indoor spaces which enable access to activities which promote the adoption of a healthy lifestyle are a key part of a strategic approach.
- We therefore support the development of sustainable action by RDC as part of an integrated approach to achieving positive outcomes, in partnership with the NHS and other statutory, voluntary and community sector partners.

8. The use of Health Impact Assessments (HIAs).

We note that East Sussex County Council's Public Health Healthy Places team has been working with all Local Planning Authorities within East Sussex to deliver the County Council's statutory public health responsibilities. It is a positive development that local Public Health colleagues will be a key advisor on health and wellbeing issues, including work on HIAs as required.

Finally, NHS Sussex welcomes the fact that RDC is looking to work closely with partners to adopt a clearly defined set of priorities and an integrated approach to planning for health, wellbeing and the environment and that this will be an active dialogue throughout the production of the Local Plan and beyond. Further engagement will support the development of the Integrated Care System in Rother and NHS Sussex looks forward to identifying and developing further collaborative opportunities.

Please do contact me should you wish to discuss any of the feedback set out in this letter.

Yours faithfully,



Ashley Scarff
Director of Joint Commissioning and ICT Development (East Sussex)

On behalf of NHS Sussex