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Planning Policy Team  
Rother District Council

By Email only

Dear RDC Planning Policy Team

### **Draft Rother Local Plan 2020-2040 – Public Consultation**

Hastings Borough Council welcomes the opportunity to formally comment on the Rother District Council Regulation 18 draft Local Plan. Hastings Council is broadly supportive of the Rother Local Plan and its vision, aims and objectives. Specific comments are made here on those areas of the Draft Plan where there are strategic cross-boundary issues. We wish to continue to work with the Rother District Council on these and other matters in the Plan, as work on the Plan progresses as part of meeting Duty to Cooperate requirements.

The following comments have been agreed with the Lead Councillor for Planning Policy:

#### **Joint Statement**

The Council is supportive of the joint statement and is committed to continuing to work closely together on strategic matters affecting both of our councils' Plans.

#### **Housing requirement and Development Strategy**

The joint Housing and Economic Development Needs Assessment (HEDNA) identifies a need for 14,740 net new homes over Rother's Plan period. The draft Plan outlines the potential to meet this need through the delivery of between 5,158 and 7,287 new homes. This equates to meeting approximately 50% of the district's identified housing need, and places a potential pressure on Hastings Council, as a neighbouring authority within the same housing market area, to assist Rother in meeting their full housing need. Rother Council, has, after the start of their Regulation 18 consultation, now formally requested this council's assistance in meeting their unmet housing need. As established through joint working with Rother planning officers, we will regrettably be unable to assist in meeting any of Rother's potential unmet need owing to the challenges we face in meeting our own housing targets.

We note that at this draft Regulation 18 stage of the plan making process, (with an additional final public consultation to follow) this draft Plan does not provide any specific allocations but presents sites that have been assessed as part of the Housing Economic Land Availability Assessment (HELAA) process. The draft Plan's preferred development strategy policy includes development around the Hastings Fringe (as referenced in option SD05 set out in the Development Strategy Background Paper) and identifies small-scale sensitive development around the fringe.



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From the HELAA document it can be identified that there are only three sites identified in the Hastings Fringe that would be considered as potentially suitable sites that have not been rejected as part of the HELAA process. Hastings will be keen to discuss these potential sites on the Hastings Fringe and surrounding area as the Rother Plan progresses and further details of specific site allocations come forward. However, in principle, the Council is broadly supportive of the residential development within the Hastings Fringe, subject to the details of specific sites and their constraints.

Furthermore, the council is supportive of the assessment within the HELAA of land at the Breadsell (HAF0007), which indicates that the site is not currently suitable for allocation.

### **Strategic Gap**

The Council is broadly supportive of the strategic gaps between Bexhill, Crowhurst and Battle in relation to Hastings, given the importance of the Combe Valley Countryside Park, environmental constraints and the lack of suitability in sustainability terms of these locations to accommodate significant levels of development. The supporting land supply evidence documents should clearly set out how these broad locations have been assessed and discounted for significant development.

### **Employment Land**

The draft Plan indicates that it will be possible to meet overall employment needs in terms of having a sufficient supply of land suitable for employment-related development. However, there is an identified undersupply of land suitable for meeting storage and distribution needs. Given the undersupply of land suitable for storage & distribution within Hastings Borough, this could result in a significant under-delivery across the district and borough functional market area combined. The Council would therefore welcome more discussion on meeting employment needs across the two authorities' areas.

### **Flood Risk**

We recognise that flood risks may cross our respective district and borough boundaries. Some watercourses have interactions with, or originate from, watercourses beyond the Hastings borough. In some cases, surface water can enter these watercourses over quite a wide area (the Combe Haven is an example of this). The Council would welcome at this stage in the development of Rother's Plan, the opportunity to explore whether the Rother Strategic Flood Risk Assessment (SFRA) is able to consider how surface water discharge may impact on flood risk in Hastings, either through runoff or interaction with watercourses.

### **Whole Plan Viability**

As already stated, the Council is generally supportive of the policies that have been proposed in the Draft Local plan and their alignment with Draft Plan objectives. However, the Council notes that there is no whole plan viability assessment underpinning the policy proposals at this time. The Council is therefore keen to understand the viability of Regulation 18 policy proposals set out, as the plan progresses.

We also look forward to the continuing dialogue between the two councils as part of the duty to cooperate process.

Mr Stephen Dodson  
Head of Strategic Programmes

