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Dear Rother Planning Policy Team,

East Sussex County Council Representations on the Rother Regulation 18 Draft Local Plan Consultation

Thank you for the opportunity to comment on the draft Rother Local Plan (RLP) at the Regulation 18 stage. East Sussex County Council (ESCC) has welcomed the engagement to date with Rother District Council (RDC) in the development of their consultation draft and this is reflected in the draft RLP. We welcome further opportunities to work with RDC as their Local Plan progresses to adoption.

The following are officer comments from ESCC, which have been sub-divided into the respective statutory roles for ease of reference. Where appropriate, the specific section within the Local Plan has been referred to.

If you have any queries on the County Council's comments, please contact:

Infrastructure Planning & Place Team,
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1. Transport and Highways

- 1.1 Overall, we are pleased to see active travel featuring so prominently within the overarching objectives (Live well locally). This is supported and very much reflects the user hierarchy in the draft East Sussex Local Transport Plan 4 (LTP4) 2024 - 2050 which was subject to public consultation in late 2023/early 2024 and will be considered for adoption by the County Council in early October 2024. The LTP4 user hierarchy outlines how consideration will be given to the needs of different transport modes and prioritises vulnerable users and 'active modes' over other users and forms of transport.
- 1.2 Whilst a 'vision-led' Plan is supported, it will be important that some elements that you would expect to find in a Local Plan are not overlooked. For example, although priority should quite rightly be given to active travel modes, improvements to the highway may also be required to mitigate the impacts of development and/or to help facilitate improvements for sustainable modes. Currently, there is no clear mechanism/policy within the Local Plan to capture this potential need for securing and delivering development generated highway interventions.

- 1.3 There is some duplication in the Plan and it would help the user if some of this was consolidated. As an example, there are currently two separate policies which need to be considered to understand the parking requirements for residential development.
- 1.4 There should also be a stronger reference given to the draft East Sussex LTP4 with the key principles embedded in the RLP. Stronger reference should also be given to the existing East Sussex Local Cycling and Walking Infrastructure Plan (LCWIP) and the forthcoming review of the LCWIP due to commence in late summer/early autumn 2024 will allow for consideration to be given to active travel connections to the emerging Local Plan allocations.
- 1.5 There appears to be less dialogue and reference to rail services within the draft Plan. The need for rail service and infrastructure improvements to enable people to travel for business and leisure is important. RDC will need to work in partnership with ESCC, Network Rail and the train operating companies (TOCs) (Southern and Southeastern) - and as and when rail reforms take place with Great British Railways - at the appropriate times to support not only improved rail services and infrastructure, but also ancillary aspects such as cycle parking (to ensure it is sensitively considered in respect of the locality), supporting walking, wheeling and cycling links to/from stations, lobbying for improving access for all in rail stations etc. The current Network Rail led East Coastway and Marshlink rail study is an opportunity to raise rail related issues and opportunities along this part of the rail network through Rother.
- 1.6 There are also opportunities to utilise vacant rail buildings for local community purposes which could, for example, link in with policy HWB4 in which existing disused spaces could be utilised communities for other purposes. TOCs have been open to this in the past and continue to be.
- 1.7 1. Introduction, Geography and Population, p11-16; Consider adding the following new paragraphs to set out the context for 'transport connectivity'.
- 'The A27/A259 corridor through the district forms part of the Strategic Road Network (SRN) and is the main east-west road link along the coast. The A21 north of Hastings also forms part of the SRN and provides the main north-south road link from Hastings to Tunbridge Wells and London. Several key junctions and roads on these corridors are either reaching or at capacity, with congestion and delay during peak hours. There are no sections of the Major Road Network in the district.'*
- 'With varying levels of public transport, active and sustainable travel accessibility across the district, some of the key transport challenges include the need to improve public transport infrastructure, journey times and service frequency'.*
- 1.8 2. Vision, Overall Priorities and Objectives, 'Development will be truly sustainable' p19; Suggest revision to say: '...Sensitive, sustainable, **accessible** and well-designed...'
- 1.9 2. Vision, Overall Priorities and Objectives, 'Quality of Life will be enhanced' p19; Suggest revision to say: '...often by walking, **wheeling**, cycling and public transport'
- 1.10 2. Vision, Overall Priorities and Objectives, p19; Suggest stronger links are made with the Local Transport Plan 4 (LTP4) by rephrasing this section: '*Residents will be able to live well locally within safe, balanced and age-friendly communities. **We want to connect people to places** where residents and visitors can reach the facilities and services they need, often by walking, cycling and public transport.*
- 1.11 2. Vision, Overall Priorities and Objectives, p19; ESCC is pleased to see that there is emphasis on active travel and public transport. This aligns with the draft East Sussex LTP4.

- 1.12 Overall Priority 2 - Live Well Locally, p23; ESCC generally support Overall Priority 2 and supporting text.
- 1.13 Overall Priority 2 - Live Well Locally, Para 2.11, p23; - suggest adding following to the end of this paragraph:
 ...and active travel. **Additional development in the district will likely add pressure onto the existing transport networks, requiring suitable mitigation to ensure that this will not have a significant adverse impact on these networks.**
- 1.14 Key Planning Issues, p24; Suggest adding new bullet to address transport and connectivity e.g.:
- **minimising the distances that people need to travel enabling higher levels of walking, wheeling, cycling and public transport journeys**
- 1.15 Spatial Objective 1, p26; Suggest revising first bullet point to say:
- **Direct development to sustainable locations, with services and active travel / public transport options**
- 1.16 Spatial Objective 1, p26; Suggest reference is made to supporting infrastructure for alternative fuel types e.g. hydrogen fuel cell technology and electric vehicles.
- 1.17 Spatial Objective 3, p26; High quality design should also bear in mind the need to be inclusive for all users.
- 1.18 Spatial Objective 5, p27; Suggest revising first bullet point to say:
- **The Local Plan Transport Assessment will provide evidence for mitigation measures and strategic / local improvements required to...**
- 1.19 Spatial Objective 5, p27; Reference should be made to draft East Sussex LTP4 and in particular the East Sussex Local Cycling and Walking Infrastructure Plan (LCWIP), the latter which will include more detail on walking, wheeling and cycling infrastructure routes across the county. An update to this document will commence from late summer/early autumn 2024 following the completion of LTP4.
- 1.20 Question 4, p29; Whilst greater emphasis should be on getting people to travel by walking, wheeling, cycling or using public transport, quite often these options are not viable, and therefore suitable and appropriate access by car is required.
- Although the inclusion of community accessibility through sustainable transport measures is laudable, it would be remiss to not consider journeys that need to be made by private car and also look at strategic connectivity for those travelling into and out of, as well as around, the county. It is suggested this could be addressed by including an additional Spatial Objective, or revise Objective 8.
- 1.21 4. Live Well Locally; Structuring the Local Plan in this way is a bold approach and is welcomed, however, it is important not to lose sight of the need for road based journeys and strategic connectivity, especially in a rural county where facilities and amenities are not always accessible by active travel and public transport.
- 1.22 4. Live Well Locally; Para 4.6, p63; Consider adding a new bullet point to cover Healthy Streets / Healthy Streets Indicators.
- 1.23 4. Live Well Locally; Para 4.6, p63; Amend third paragraph as follows:
'Active Travel England (ATE) design assistance tools and planning application assessment toolkit' - helps to assess the merits of walking, wheeling and cycling as

part of a development proposal. Although ATE are only statutory consultees for larger developments (150+ residential units, 7,500m² or sites having area of 5+ hectares) most of the principles embedded within the guidance will be applicable for other planning applications in Rother. ATE has an overall objective for half of all journeys in towns and cities to be cycled or walked by 2030, transforming the role that walking and cycling play in England's transport system.

- 1.24 4. Live Well Locally; Para 4.7, p63; After considering national guidelines it would be logical to include a section within the Plan that incorporates local / sub-regional guidance - particularly LTP4. Suggested text is provided below:

'Local Transport Plans (LTPs) help to provide the strategic context against which the Local Plan should be prepared from a transport perspective. Within East Sussex, the Rother Local Plan has been progressed against the backdrop of existing LTP3 and emerging LTP4 covering the period 2024 to 2050 which is expected to be adopted in autumn 2024. The principles and policies included in these documents have been firmly embedded within the Local Plan. In particular, the Local Plan is reflective of the overarching vision of LTP4 to deliver an 'inclusive transport system that connects people and places; that is decarbonised, safer, resilient, and supports our natural environment, communities, and businesses to be healthy, thrive and prosper.' The Local Plan also responds to the following key policy areas of the draft LTP4:

- *Opportunities for sustainable economic growth*
- *Inclusive engagement and decision-making*
- *Balancing the needs of rural and urban residents*
- *Net zero carbon*
- *Health and wellbeing and social inclusion*
- *Safety*

The ESCC Local Cycling & Walking Infrastructure Plan 2021 (LCWIP) sets out a plan for proposed cycling and walking networks and measures within the county. It is focussed on areas where there are the greatest opportunities to increase levels of cycling and walking, with an emphasis on delivering infrastructure improvements which will support housing and those people who currently do not cycle or walk. Potential schemes are identified in Rother with a focus around Bexhill, Battle and Rye. The LWCIP is due to be updated in 2024 when there will be further opportunity to better integrate the Local Plan development sites with an enhanced and / or extended cycling and walking network'

- 1.25 LWL1: Compact Development p 65-68; There is no reference to upgrading and improving strategic connectivity by road, via the strategic road network managed by National Highways and the major road network of the most economically important A class roads in the county, which are managed by the County Council. Whilst our preference for journeys is undoubtedly via active travel and public transport, it is recognised this won't be a viable option for all, and the need for a high-quality road network is an important consideration and needs to be included. Therefore, ESCC suggest adding some detail about the need for a high-quality road network to improve strategic connectivity and support for the local transport authority (ESCC) and National Highways developing a road network that tackles congestion hotspots, reduces journey times, and prioritises buses / cycles.
- 1.26 LWL1: Compact Development, policy box, p66; Please note there is a drafting/format error in last sentence.
- 1.27 LWL1: Compact Development, policy box, p66; Please amend last sentence in policy box to read as follows;

*'...good access to shops, services, **active travel options** and public transport connections;'*

- 1.28 LWL1: Compact Development, Para 4.13, p67; Suggest revising paragraph 4.13 to say: *'...creating communities that can walk, wheel and cycle...'*
- 1.29 LWL2: Facilities & Services, p69-72; Road based traffic should not be completely discounted (private vehicles) for strategic connectivity. It is suggested that the Local Plan needs to highlight that people will want to travel outside of their local area; not all people are going to want to live locally. In addition, there is no mention of Electric Vehicle (EV) charging facilities and supporting infrastructure.
- 1.30 LWL2: Facilities & Services, i) Accessible Centres, p69; Amend third and fourth paragraphs to refer to *'walking, **wheeling** and cycling'*.
- 1.31 LWL2: Facilities & Services, i) Accessible Centres, p69; Amend third and fourth paragraphs to refer to *'walking, **wheeling** and cycling'*.
- 1.32 LWL2: Facilities & Services, i) Accessible Centres, Examples of local amenities p69; It is not clear if some, or all, of those listed are a requirement.
- 1.33 LWL2: Facilities & Services, i) Accessible Centres, Examples of local amenities, p69; Please can a transport hub (bus stops, car club for example) be added to this list.
- 1.34 LWL2: Facilities & Services, i) Accessible Centres, p69; 'In village and Countryside Area' - is there a typo/missing word in first line?
- 1.35 LWL2: Facilities & Services, (B) (i) Indoor meeting place, p70; Last sentence should be revised - ...to support~~s~~ social prescribing
- 1.36 LWL2: Facilities & Services, p69-72 and LWL4: Walking, Wheeling, Cycling and Public Transport (Within the Site), p79-82; Consideration should be made, in these sections, to include e-cargo bike storage to enable door-to-door delivery of small goods reducing road-based traffic for deliveries.
- 1.37 LWL3: Walking, Wheeling, Cycling and Public Transport (Outside the Site), LWL4: Walking, Wheeling, Cycling and Public Transport (Within the Site) p73-82; All references to ATE's Design Tools / Guidance should refer to: **Active Travel England's (ATE) [design assistance tools](#) and [planning application assessment toolkit](#)**
- 1.38 LWL3: Walking, Wheeling, Cycling and Public Transport (Outside the Site), p73-78; When referring to policy and standards, it is suggested that this should be future proofed and caveated somewhere in the policy by also adding: 'or updated versions thereof'.
- 1.39 LWL3: Walking, Wheeling, Cycling and Public Transport (Outside the Site), p73-78; It is suggested that consideration is made for including the need for mobility hubs.
- 1.40 LW3(A)i Access and Provision of Public Transport, p73; It is suggested that the policy should be reworded as emphasis needs to be on providing public transport access to work, education, shopping, social and medical opportunities. Specific reference to Demand Responsive Transport (DRT) should also be omitted as this type of bus service will not continue beyond March 2026 unless significant ongoing funding streams are confirmed (DRT types of bus operation are not commercially viable). In addition, reference to the term 'shuttle bus' services is not required as there is no clarity as to what this would be in practical terms.

It is also suggested that the wording in relation to walking distances and amending bus services needs to be amended to recognise the ongoing financial viability of amending bus services to meet this requirement. Therefore, the following re-wording is proposed:

'i) Access and Provision of Public Transport. Be located on sites that have access to effective and convenient public transport, particularly in relation to scheduled bus routes to train stations, but also through, Demand Responsive Transport (DRT) or shuttle bus services bus services to access to work, education, shopping, social and medical opportunities. This provision should also offer links to train stations.

This must be either through proximity to existing routes or through the provision of new or extended routes, within a 400m walking distance of all properties. Development should be planned to ensure all properties are within 400m walking distance of bus services. Amending existing bus service routes, or the provision of new routes, is an option to meet this walking distance requirement, but such bus services are likely to be less financially sustainable once development contributions end and therefore this approach should be avoided wherever possible.

Specific provision must also be made in relation to bus stop facilities and the walking route to/from these bus stops and the development. These must be safe, accessible, attractive and convenient. The bus stop facilities would be expected to include raised bus stop boarding kerbs, bus stop clearway markings, hard standing, bus shelters, lighting, seating, bus stop poles (to ESCC's specification) and real time passenger information signs. This may be by way of upgrading existing bus stop infrastructure appropriate to the site, or by way of new bus stops'

- 1.41 LW3(A)ii) Active Travel Infrastructure, p73; revise to refer to *'...submission of a Transport Assessment/ Transport Statement/ Transport Report that:'*
- 1.42 LW3(A)ii) Active Travel Infrastructure, a. and b. p73-74; It is suggested that reference is made to a Non-Motorised User Audit to identify the strengths/ weaknesses/ opportunities for encouraging active travel modes for travel
- 1.43 LW3(B)i) High-quality Walking and Wheeling Routes, p75; The Active travel infrastructure section has two sets of lists. For the second list, and to be consistent, b) should say *'be step-free'*. It would be useful to add *'include parking restrictions where required'* to this list.
- 1.44 LW3(B)i) High-quality Walking and Wheeling Routes, p75; There does not have to be reliance on one specific node, so would suggest amending to *'nodes'*
- 1.45 LWL3: Walking, Wheeling, Cycling and Public Transport (Outside the Site), p76; It is suggested that the following text is added, after paragraph 4.23, to provide context:

'The wider policy agenda for transport has evolved over the past decade, with considerable focus on an approach that plans for people and places (known as 'decide and provide'), rather than predicting and mitigating impacts (known as 'predict and provide'). The 'decide and provide' approach to transport planning decides on a preferred vision of the future and then provides the means to work towards achieving that, whilst also accommodating potential uncertainties about the future. This offers the opportunity for more positive transport planning and helps implement the transport user hierarchy, as set out in draft Local Transport Plan 4, by considering walking, cycling and public transport upfront.

This approach will ensure that development is allocated in locations where there are the best opportunities for reducing the need to travel by co-locating residential and employment uses, or where exists the best opportunities for providing high-quality active and sustainable transport infrastructure improvements. Developments to the

transport network can also help to ‘unlock’ sites for future housing by providing new and improved connectivity to existing urban areas.’

- 1.46 LWL3: Walking, Wheeling, Cycling and Public Transport (Outside the Site), Para 4.24 p76; The text should be revised to read: ‘...walking, **wheeling** and cycling routes..’
- 1.47 LWL3: Walking, Wheeling, Cycling and Public Transport (Outside the Site), Para 4.25 p76; It is suggested the following text should be added after Para 4.25:
- *Most applications for development in Rother will need to include a document specifically addressing transport, assesses the transport consequences of the development and details the measures and/or initiatives proposed to provide for the transport demands arising from that development as well as mitigate its transport impacts. As explained within ESCC’s guidance ‘Transport Assessments, Transport Statements and Transport Reports Guidance for Development Proposals in East Sussex’ the form of document required will depend on the scale and type of development.*
 - *In line with ESCC guidance, a Travel Plan will also be required for most major developments. The County Council welcomes and encourages pre-application discussions on the merits of a proposal before a formal planning application is submitted.*
- 1.48 LWL3: Walking, Wheeling, Cycling and Public Transport (Outside the Site), Para 4.27 p77; It is suggested that consideration is given to incorporating some of the LCWIP text suggested to be added to paragraph 4.7 of the Local Plan as set out in paragraph 1.23 of this representation.
- 1.49 LWL3: Walking, Wheeling, Cycling and Public Transport (Outside the Site), Para 4.29 p77; It is suggested that paragraph 4.29 is moved to the glossary.
- 1.50 LWL3: Walking, Wheeling, Cycling and Public Transport (Outside the Site), Para 4.31 p78; Revise paragraph 4.31 to read: ‘...make walking, **wheeling** and cycling feel...’
- 1.51 LWL4: Walking, Wheeling, Cycling and Public Transport (Within the Site), Policy wording, p79; It is suggested that bus stop facilities and walking routes to bus stops are also being referenced as per LW3(A)i) and our comment in paragraph 1.39.
- 1.52 LWL4: Walking, Wheeling, Cycling and Public Transport (Within the Site), Para 4.35 p82; Revise paragraph 4.35 to refer to wheeling.
- 1.53 LWL4: Walking, Wheeling, Cycling and Public Transport (Within the Site), Para 4.36 and Q37 p82; Consider the inclusion of School Streets. If a site is self-sufficient and has a school it is recommended that a school streets style approach should be incorporated from the outset.
- 1.54 LWL7: Streets for All, (A)i) Design Speed of New Streets p94; Not all new streets require signage if design speeds are 20mph, as this creates street clutter (as referred to in point x of this policy) and there should be sufficient speed reducing visual character to create a low-speed environment (e.g. trees, crossing points, prominent footways/cycleways, play areas).
- 1.55 LWL7: Streets for All, (A)ii) Shared Streets p94; It is unclear whether this refers to shared space or shared highway which has defined user areas? If it does refer to shared spaces it should be understood that these are difficult to adopt due to safety risks for visually impaired users. It is unclear how land dedicated as ‘highway’ can be defined as land where there is freedom to pass and repass as well as public open space? It is

suggested that this is revisited to clarify and to ensure the aims are consistent with practical application as well as legislative and policy terms & provisions.

- 1.56 LWL7: Streets for All, iii) Dementia Friendly Districts and Para 4.59 p94; It is suggested that needs to be more specific as to which reliable resources and guidelines could be used to design dementia friendly environments. Are there any specific design codes or guides?
- 1.57 LWL7: Streets for All, xi) Healthy Streets p96; It is suggested that the healthy street indicators are listed.
- 1.58 LWL7: Streets for All, (B), p96; Revise to read '*crit*erion' rather than '*crit*eria'
- 1.59 LWL7: Streets for All, p94-96; Consideration should be made to include cycle parking facilities and e-cargo parking facilities in streets which are sensitively designed to integrate into the surrounding environment.

LWL8: Multimodal Parking, p100-106; There is currently no reference in this policy to the East Sussex 'Guidance for Parking at New Development (March 2024)' and the related parking calculator for residential development. It is acknowledged that the Reg 18 Local Plan would have been well advanced when these were published but, as explained below, there would now be merit in making this reference / link and ensuring that the approach / wording is consistent. It is also acknowledged that the Guidance is referenced later in the Local Plan (HOU14: External Residential Areas) but as explained in the comments to that policy below it is considered that this is better captured here.

The current wording of LWL8 is broadly in line and consistent with the ESCC guidance so there is no reason for not including this and giving it some 'policy weight'. This is the approach being taken within other emerging Local Plans within East Sussex.

Furthermore, LWL8 as drafted, does not cover some of the matters addressed within the ESCC guidance (visitor parking, design, EV charging infrastructure etc). It is suggested that ESCC guidance is cross referenced and that some of the wording of the relevant criteria with the draft policy is amended to be more consistent / aligned with the guidance. Alternatively, it might be that this policy can be reduced in length and scope if weight is given to the ESCC guidance.

LWL8: Multimodal Parking, p100-106; Linked to our comment in paragraph 1.59, there is currently no indication what level of parking is expected / required for all types of parking provision (it is acknowledged that this is covered within HOU14 but it is felt that it is better addressed here).

The ESCC guidance includes details of the requirements for cycle parking and for non-residential development. The related calculation tool for residential development has been developed utilising Census Ward data and allows site specific determination of predicted parking demand by entering data including the location (ward) dwelling type (house or flat) size (number of bedrooms) tenure (owner occupied / other (shared ownership / rented / rent free)) and the way parking is provided (allocated or unallocated).

Whilst the calculator will help to determine the appropriate level of parking provision, the ESCC guidance sets out the local characteristics and other considerations that should also be taken into account when considering the optimum level of provision for any development proposal.

- 1.60 LWL8: Multimodal Parking, p100-106; There is no reference to EV charging spaces. These should be part of new development and car parking sites, as actual and passive provision to ensure the infrastructure is in place as demand increases.

- 1.61 LWL8: Multimodal Parking, iii) On Street Parking, p101; We suggest that the criterion should be consistent to keep it clear and understandable. For example, criteria c/ d/ e would need to follow an introductory sentence, for example ‘Proposals that include new on street parking should.....’ Criteria a) and b) take a different approach.
- 1.62 LWL8: Multimodal Parking, iv) In Curtilage Garages, p101; The first sentence (‘Use limited on multi home developments’) is unclear and there appears to be words missing (...should be...) in the second sentence. In line with ESCC guidance (and assuming that weight is given to the Calculation Tool for residential development) suggest this text is revised to say;
- ‘Given the use of garages and the negative impact that they can have on the street scene, parking on new developments is best provided on driveways, car ports or allocated parking bays. Where garages are proposed, they will need to meet the minimum dimensions set out in relevant guidance. However, due to their limited use, even when these standards are met the garage spaces will only count as 1/3rd space. This means for every 3 garages to be provided, they will only count as 1 parking space towards the overall parking requirement.’*
- 1.63 LWL8: Multimodal Parking, v) In Curtilage Parking a., p101; This type of arrangement, when accessed at the front of a dwelling, is basically an opportunity to support tandem parking. To protect the visual aesthetic in this way, the drive would need to be at the rear.
- 1.64 LWL8: Multimodal Parking, ix) Communal ‘Remote’ Car Parking c., p103; It is unclear whether this would fall into the category of visitor or shared parking area. Ideally these designations should not be exclusive to small sections of a larger development.
- 1.65 LWL8: Multimodal Parking, xii) Other Parking, p103; The second sentence currently reads ‘Facilities, with an electricity supply, must be suitable for a range of types including mopeds, scooters and motorbikes’. The policy aims here are not clear and it appears to be conflating two issues (two wheeler parking and EV charging). Therefore, it is suggested that this sentence is revised or deleted. It is suggested that, as an alternative, in line with the ESCC ‘Guidance for Parking at New Development’, this criterion is split to cover, firstly, ‘Powered Two-wheeler Parking’ and secondly, ‘Electric Vehicle (EV) Charging Infrastructure’. The wording should then be revised so it is consistent with the ESCC guidance.
- 1.66 LWL8: Multimodal Parking, Para 4.71, p105; The ESCC guidance refers to national research indicating that, depending on location, only 19% - 45% of garages are used for parking vehicles.
- 1.67 LWL8: Multimodal Parking, Para 4.74, p105; It is unclear why and how ‘car barns or car ports can effectively allow for a low car, or even a car-free environment’. The second sentence which says that they are much more likely to be used than garages would seem to contradict the first statement.
- 1.68 Development Strategy and Principles, p109 and Development Strategy background paper; The Reg 18 Local Plan does not currently include site specific allocations. The current approach avoids the repetition of generic policy requirements across every proposed allocation (and there is no objection with this). However, there is a real risk that specific site requirements will be missed and ESCC is strongly of the view that there needs to be a mechanism within the Local Plan to highlight these site specific measures.

Site allocation policies are a positive feature of a Local Plan as they can highlight the specific criteria against which a development needs to be judged and thereby speed up the implementation process, providing clarity for a wide range of interested parties. In line with the NPPF (para 108), opportunities to promote walking, wheeling, cycling

and public transport use should be identified and pursued. For example, this may include the extension and / or enhancement of walking and cycling networks that are located in close proximity to the site in question. The ESCC Local Cycling & Walking Infrastructure Plan is due to be updated in 2024/25 when there will be further opportunity to better integrate the Local Plan development sites with an enhanced and / or extended cycling and walking network.

Therefore, where appropriate, it is recommended that, when the site allocation policies are drafted, the policy and/or supporting text for each allocation provides clear reference to transport requirements/ mitigation that would be required to facilitate the delivery of the development and the necessary improvements to support the use of active travel modes and public transport. This will be particularly important for proposed sites which are currently not well served by public transport or walking, wheeling or cycling routes where a package of measures will be required.

Similarly, the assessment and modelling of Local Plan development scenarios may indicate impacts on the highway network that would require improvements and mitigation. Site specific policies would, for example, allow for junction/road network improvements and committed schemes to be highlighted. As evidenced through transport modelling, these improvements may be required from a single development but also may be needed as a result of the cumulative impacts from a number of development sites or be contingent upon highway schemes being delivered.

The level of detail required in a site allocation policy will depend on the type of development and its location. However, it ought to be detailed enough to provide information on what is expected, where it will happen on the site and when development will come forward, including phasing. Mitigation and enhancement measures identified as part of the site selection process and evidence gathering are best set out within the policy to ensure that these are implemented.

Initial work has been undertaken to assess the transport requirements that would need to be delivered to support the delivery of the proposed site allocations. ESCC will continue to work with RDC as the Local Plan is progressed to identify and agree site specific transport mitigation measures that, where appropriate, should form part of site allocation policies for individual sites.

- 1.69 Development Strategy and Principles, Vision for Bexhill, Hastings Fringes and Radial Settlements, Battle and Surrounding Settlements, Rye and the Eastern Settlements Cluster, Northern Rother p123-162; The explanatory text is helpful. However, details including what transport infrastructure is required to support development is a bit lost in the text. Therefore, it would be helpful to have a table showing required infrastructure to support development. As mentioned in our comment about 'site allocations' (paragraph 1.69) this may lend itself better being a policy. Setting such details out in a clear manner would strengthen our position when requesting transport improvements relating to new development. Reducing ambiguity for the developers is important.
- 1.70 Development Strategy and Principles, Vision for Bexhill, Hastings Fringes and Radial Settlements, Battle and Surrounding Settlements, Rye and the Eastern Settlements Cluster, Northern Rother p123-162; There is no cross reference to which policies are applicable. It is suggested these are referenced somewhere. Potentially, they could be included as an additional column to the tables listing 'identified' development sites.
- 1.71 Development Strategy and Principles, Battle and Surrounding Settlements p140-146; No reference is made to Battle Station in this section. Battle Station will be getting step free access having been one of the successful stations awarded Network Rail's 2024 'Access for All' funding. In addition, ESCC also worked in partnership with RDC and other stakeholders in getting sensitively placed and designed cycle parking at the station. Walking, wheeling and cycling to the station could be improved.

- 1.72 Development Strategy and Principles, Battle and Surrounding Settlements p140-146; Pleased to see inclusion of blue and green infrastructure within the Plan. Support the protection of existing, and the development of new, blue and green infrastructure.
- 1.73 HWB5: Green and Blue Infrastructure, p211 - 214; We welcome the inclusion of blue and green infrastructure within the Plan and support the protection of existing, and the development of new, blue and green infrastructure.
- 1.74 HWB6: Public Rights of Way, p215 - 217; The inclusion of this policy is supported and would suggest the policy should go further and also include the protection of bridleways. It is important for all users to be considered.
- 1.75 HWB7: Combe Valley Countryside Park, p218 - 220; Access to the Countryside Park should be considered especially improved access by walking, cycling, wheeling and public transport (bus).
- 1.76 INF1: Strategic Infrastructure Requirements, p223-225; It is suggested that this policy is made clearer as to what it meant by infrastructure and which types of infrastructure are included in the policy; does it include transport infrastructure, for example? The explanatory text is generally ambiguous regarding this, and therefore, more detail would be welcomed.
- 1.77 HOU1: Mixed and Balanced Communities, HOU2 Affordable Housing and HOU3: 100% Affordable Housing Developments p229 - 246; It is important that new development considers active travel routes to/from the site or identifies opportunities for the development to introduce these to connect people to places from where they live. This is important for all, but especially those who do not have access to a private car or cannot afford public transport.
- 1.78 HOU14: External Residential Areas ii) Car Parking and Paras 8.137 - 8.141 p 292- 296; It would be more logical if the policy requirements and supporting text relating to parking was moved to policy 'LWL8: Multimodal Parking' with a suitable cross reference from this policy. This would ensure that the requirements for all types of parking are captured (the current approach only relates to residential areas so parking guidance / standards for other uses are not captured).
- 1.79 HOU14: External Residential Areas ii) Car Parking. p 292 and Para 8.137. p295; The paragraph should now refer to the ESCC 'Guidance for Parking at New Development (March 2024)' particularly if and when RDC have formally adopted the new ESCC Guidance document.
- 1.80 HOU14: External Residential Areas, p292 - 297; It is suggested consideration is made to how these external residential areas are accessed by walking, wheeling and cycling, and furthermore, how these connect to public transport routes, such as bus and rail, to enable connection to longer journeys.
- 1.81 HOU19: Access and Drives, iii), p313; This policy point should make specific reference to betterment in highway safety, therefore it is suggested that the wording should be revised to say '*...of an existing access, if there **is clear highway betterment in terms of safety for** relocating the existing access.....*'
- 1.82 HOU19: Access and Drives, p313; A policy point should be added to reflect that the creation of second accesses to the same dwelling to provide in - out drives will be strongly resisted unless it is demonstrated that there is a need for highway safety reasons.
- 1.83 HOU19: Access and Drives, p313; A policy point should be added to ensure that new drives and accesses onto a classified road will require sufficient in-curtilage turning

provision for the parking accommodated so that each vehicle can enter and exit in a forward gear.

- 1.84 HOU19: Access and Drives, p313; A policy point should be added to reflect that loose driveway surface treatment cannot be supported as it can be dragged out into the footway and carriageway posing highway safety risk to vulnerable users such as motorcycles and cycles

2. King Charles III England Coast Path (KCIIECP) National Trail Southeast Section

- 2.1. It is welcomed that Rother District Council have highlighted the KCIIECP in their draft plan.

- 2.2. LWL3: Walking, Wheeling, Cycling and Public Transport (Outside the Site), iii) Coastal Access p74; It is noted that this proposed Policy includes a specific reference to the King Charles III England Coast Path (KCIIECP). This specific 'Coastal Access' policy text is welcomed and supported, as it will help to protect and enhance the National Trail. However, it is requested that the wording is strengthened. Suggested text in italics below:

*iii) Coastal Access. Public access to the coast must be retained and improved where possible (e.g., through the creation of new path links). The King Charles III England Coast Path National Trail must be protected and opportunities taken to enhance the route (e.g., **improvements to path accessibility**, re-aligning the trail closer to the sea).*

- 2.3. LWL4: Walking, Wheeling, Cycling and Public Transport (Within the Site), p79; Given there is a strong possibility of development taking place along the coast, it is requested that the Coastal Access text in Policy LWL3 is also inserted into Proposed Policy LWL4. This approach would ensure that the trail is protected and enhanced along the entire coastline, regardless of the route being located within or outside a development site.

- 2.4. Policy ENV4: Fairlight Cove Coastal Change Management Area, p380; We welcome and support the proposed policy wording as it refers to the KCIIECP, stating that development will only be acceptable in this area if it does not hinder the creation and maintenance of the trail.

3. Education

- 3.1. Prior to this consultation we have only received detailed housing trajectories and totals from Rother District Council for their current Local Plan timescale to 2027/28. Therefore, our position regarding how planned housing totals may affect education infrastructure requirements, has changed very little since we made an informal consultation response on the subject in November last year. That response is duplicated in the following paragraphs with updated amendments highlighted in red.

- 3.2. We reserve the right to review the impact of Local Plan housing numbers on the requirement for early years, school and SEND places in the District and, in time, the impact of the government's childcare offer on early years places. Any changes in our requirements will be reflected in the local authority's School Organisation Plan, which is updated and published annually, and in future iterations of the Local Plan IDPs.

- 3.3. Bexhill

The only school planning area in Rother where our pupil forecasting model is showing strategic shortfalls at primary reception (Year R) is Bexhill - starting from around 2029/30 with a shortfall of up to one form of entry and rising to around three forms of entry by the end of 2030's. These projections are only based on known housing completions to 2027/28. After that, previous average rates of housing completion are projected forward, which may be inaccurate.

The development strategy is projecting a maximum of 3,400 dwellings for Bexhill over the period 2020-2040. This is a lot lower than the 5,400 currently factored into our forecasts and the demographic projections of births underlying them. On the other hand, the demographic projections of births may not be fully taking account of the natural 11-13 year cycles of upswing and downswing in births.

Irrespective of actual housing completion rates, if previous demographic birth trends are repeated, we are about to enter another upward cycle of births which could lead to relatively high primary school numbers in the District in the next decade - with Year R numbers peaking towards the end of the 2030s.

Secondary Year 7 numbers across the County have only recently peaked. If previous demographic trends are repeated we would not expect to see another peak until the 2040s, beyond the timescale of the Local Plan. The pupil forecasting model is currently showing the existing combined PAN of 500 for Bexhill being exceeded by up to one form of entry from 2037/38. This is to a large extent down to the direct pupil yield from the new housing. As above, this yield is being calculated on higher assumed housing numbers than are in the development strategy.

In summary, based on current data, a shortfall of Year R places in Bexhill is likely from around the turn of the decade, but it is difficult to be precise about the full extent of that shortfall. A shortfall in Year 7 places may emerge later in the 2030s.

3.4. Battle

The development strategy is proposing a maximum of around 500 dwellings over the 20-year Local Plan period. Most of these dwellings are already factored into our forecasts and are likely to be mainly built out within the current Local Plan timescale to 2027/28. The primary Year R forecasts for Battle and Langton CE Primary School are not currently showing the PAN being exceeded. Even, allowing for the caveat of demographic trends pointing to higher births in the 2030's, as long as current outflow levels from the Battle and Langton area are maintained and the admissions system can restrict inflows from other areas, persistent shortfalls at Year R may be unlikely.

Secondary Year 7 shortfalls at Claverham Community College are unlikely, given the likelihood that the admissions system can restrict inflows from Hastings Borough.

3.5. Other areas of Rother

The quantum of housing being proposed for all other areas is unlikely to lead to significant shortfalls of Year R or Year 7 places based on existing PANs.

3.6. Early years

A number of areas within Rother are likely to see increasing pressure on early years places as a result of a rising birth rate, new housing developments and the government's expanded childcare offer. **The likely areas are:**

- Bexhill
- Brede
- Etchingam
- Staplecross
- Stonegate

The impact of the expanded childcare offer may change the early years supply and demand picture in other areas of Rother, but this is difficult to predict with any certainty at the current time.

3.7. SEND/Special Schools

Our SEND forecasting model is showing an increased demand for places in special schools and specialist facilities in mainstream schools in Rother District in the period

2030/31. The SEND forecasts are based on an assumed total of over 5,000 new housing units being built in Rother District between 2020/21 and 2030/31. This compares to the 7,300 figure in the [Rother Local Plan document for the whole Local Plan period so is likely to be too high.](#)

- 3.8. [Infrastructure Delivery Plan, Infrastructure Type: Education, p46](#); The following updates should be made to the tables in the Infrastructure Delivery Plan to merge primary and early years in Bexhill as they would most likely be delivered together as one project. An entry for secondary places in Bexhill should also be added based on the information in paragraph 3.3 of this response.

IDP Project reference	Project Name (and scheme status)	Location: Settlement, Parish	Priority (Critical, Essential, Desirable)	Strategic or Local	Timescale for delivery (Short/Medium/ Long term)	Identified cost	Delivery body(ies)	Identified funding sources and amounts	Risk to delivery (Low/Medium/ High) and mitigation	Funding gap
EDU001	Early years and primary school places additional capacity: Provision of early years and primary school places in Bexhill through the construction of new education provision on land at Northeast Bexhill	Bexhill-on-Sea	Critical	Strategic	Short Term	£tbc	ESCC	Government grants, ESCC capital programme, developer contributions and Community Infrastructure Levy (CIL)	High	Unknown
EDU002	Secondary places additional capacity: Provision of secondary school places through the expansion of existing provision	Bexhill-on-Sea	Essential	Strategic	Long Term	£tbc	ESCC	Government grants, ESCC capital programme, developer contributions and Community Infrastructure Levy (CIL)	Medium	Unknown

4. Libraries

- 4.1. [DEV4: Retention of Sites of Community or Economic Value, p188](#); Libraries and library services offer people the enjoyment of reading for pleasure and access to culture and they also support people in many other ways - to go online and use online services, to find employment or take up new training opportunities, to find information about health and other services in their local community, to improve their sense of wellbeing, to study, to pursue hobbies and interests, and much more.
- 4.2. [HWB4: Community Facilities and Services p207-210](#); It is suggested that this section should mention public libraries. Libraries support local communities by the delivery of the Libraries Connected Universal Library Offer which aims to connect communities, improve wellbeing and promote equality through learning, literacy and cultural activity.
- 4.3. [INF1: Strategic Infrastructure Requirements p223 - 225 and Q110. p225](#); Public libraries should be considered an infrastructure requirement with requirements included to enable library services to meet the needs of communities, particularly where new housing development creates a need for the provision of expanded service delivery.

Any development contributions from CIL would see additional opportunities to cultivate a positive local impact with outreach projects, for example in children's centres, schools and local community voluntary organisations focusing on delivering against our four key priorities:

- improving child and adult literacy and numeracy
- supporting the economy
- better health and wellbeing
- increasing digital inclusion

4.4. Infrastructure Background Paper; Satisfied that this is included and contains reference to the current Library Strategy and correct local sites.

4.5. Infrastructure Delivery Plan, Infrastructure Type: Community Infrastructure, p47; Please remove reference to mobile library service. Consider amendment to this section to include: '*e-Library Service: improved access to online library services including ESCIS* particularly in rural and hard to reach areas*'.

The e-Library provides a wide range of online services and resources, available at any time. Using the e-Library residents can download eBooks and e-Audiobooks to their own device (computer, phone or tablet) without having to go to a library. This includes high quality fiction and non-fiction for adults and children. Residents can also download a wide range of e-Magazines free of charge to their own device. Customers have access to the online reference library, which includes lots of information resources such as newspapers, encyclopaedias and dictionaries, business information and family history sites. Customer can access their library account, renew their loans and place reservations on items they would like to borrow.

East Sussex Community Information Service (ESCIS*) is our online database of local and community information and events across East Sussex and Brighton and Hove. It's an invaluable community resource and supports social prescribing. It is free for organisations to be listed and currently lists over 8,000 organisations.

5. Culture and Tourism

5.1. Live Well Locally, Key Planning Issues, para 2.13, p24; The commitment to providing better facilities for sports, leisure, culture and tourism to meet the needs of the local community and those visiting the area; is welcomed. This is supported by the East Sussex Cultural Strategy and the Creating Healthier Lives Strategic Action Plan.

5.2. Figure 6: Rother Local Plan Strategic Spatial Objectives, No. 6, p26; - The concept of a Cultural Opportunity Zone could be explored and would be welcomed. The concept has been developed by the South East Creative Economy Network (SECEN) and informed by the SECEN Framework for Creative Open Workspace in line with this objective. See also ECO2

5.3. Figure 7: Delivering sustainable development through the Local Plan, p30; It is suggested that the word '*heritage*' is replaced with '*culture*'. Culture, in accordance with the DCMS definition, includes heritage but is broader and captures a range of factors to support health and wellbeing and the economy. This includes Advertising and marketing; Architecture; Crafts Design and designer fashion; Film, TV, radio and photography; Museums, galleries and libraries; Music, performing and visual arts; Publishing; and IT, software and computer services (includes video games). (DCMS Sector Economic Estimates Methodology (2021).

5.4. LWL2: Facilities & Services (A) i, p69; It is suggested that cultural venues are included in this list.

5.5. LWL7: Streets for All (A) vi, p95; The inclusion of cultural installations and public art is welcomed. However, caution needs to be taken to avoid this well-meaning policy

leading to unintended consequences. Therefore, best practice should be followed when these are commissioned including open tenders and decommissioning policies to avoid the inclusion of sub-standard work which outlives its lifespan or desirability. It is particularly important that any installations also reflect the other elements of the policy, for example, dementia friendly.

- 5.6. ECO2: Protecting Existing Employment Sites and Premises, p321-322; The concept of a Cultural Opportunity Zone could be explored and would be welcomed. The concept has been developed by the South East Creative Economy Network (SECEN) and informed by the SECEN Framework for Creative Open Workspace.
- 5.7. ECO2: Protecting Existing Employment Sites and Premises, para 9.24, p325; The paragraph states that there is 'the potential to claw back demand that is currently lost through trips to Central London'. Is there evidence and data to support the assertion that demand is being lost to London?
- 5.8. ECO5: Tourism Activities, Facilities and Accommodation, para 9.43, p332; It should be highlighted that tourism also relies on our cultural destinations offer which is one of the primary reasons visitors cite for visiting East Sussex.

6. Flood Risk Management

- 6.1. ENV1: Coastal, Water and Flood Risk Management vi), p367; Section vi) discusses the LPA's preference around non-mains foul drainage solutions. Whilst the principle of this section is acceptable, we would advise the removal of the hierarchy list. This will ensure the policy remains up to date should the Environment Agency's hierarchy alter during the lifetime of the Local Plan.
- 6.2. ENV1: Coastal, Water and Flood Risk Management, Para 11.8, p369; Paragraph 11.8 should include an additional caveat to ensure a point of connection is discussed with the relevant Water Authority, therefore amend to read; '*The Council must be satisfied that the applicant has identified the closest potential point of connection, **in communication with the Water Authority**, to the existing public foul sewerage network.*'
- 6.3. ENV1: Coastal, Water and Flood Risk Management, p366-370; It is advised that any reference to '*Southern Water*' should be replaced with the term '*Water Authority*' to ensure the policy remains relevant should there be any changes to how water companies operate within the lifetime of the Local Plan.
- 6.4. ENV1: Coastal, Water and Flood Risk Management, Para 11.11, p369; Paragraph 11.11 should remove reference to the non-mains hierarchy to ensure the policy remains up to date should the Environment Agency's (EA) hierarchy alter during the lifetime of the Local Plan. In addition, compliance with the EA's General Binding Rules cannot be a planning policy requirement.

The following wording is, therefore, recommended; '*Applicants should provide evidence that the Environment Agency's General Binding Rules has been considered, and where compliance is not possible that application for the relevant permits has been submitted.*'

- 6.5. ENV1: Coastal, Water and Flood Risk Management, p366-370; Please be aware that the Pevensey & Cuckmere Water Level Management Board requires a nine-metre buffer between its water management/flood infrastructure and any development or other obstruction. Please see [Confirmed Byelaws for Pevensey & Cuckmere Water Level Management Board \(wlma.org.uk\)](http://www.wlma.org.uk) for more information.
- 6.6. ENV2: Sustainable Surface Water Drainage, p371; The first paragraph of the policy wording should be altered to ensure it reflects Lead Local Flood Authority (LLFA)

terminology with regards to drainage strategies: “For planning permission to be granted, applicants must demonstrate that sustainable drainage is an integral part of the proposed development and its design **through the submission of a Drainage Strategy.**”

- 6.7. ENV2: Sustainable Surface Water Drainage (ii), p371; Part (ii) of the policy should be altered to ensure developers discuss and agree appropriate discharge rates for a site with the LLFA. This will allow site and development specific conditions such as discharge points, geology, topography etc to be taken into consideration when determining maximum discharge rates/ volumes. The following wording is, therefore, recommended;

‘For minor applications peak run-off rates from development must be the lower of the two following options: either the greenfield rate in terms of volume and flow; or the existing rate/volume of discharge. For major applications appropriate run-off rates and volumes should be determined in conjunction with the LLFA.’

- 6.8. ENV2: Sustainable Surface Water Drainage (vii), p372; Part (vii) of the policy should be modified to ensure existing flood flow paths are also taken into consideration. The following addition is, therefore, recommended;

‘new development should utilise opportunities to reduce the causes and impacts of all sources of flooding, ensuring flood risks are not increased elsewhere, that existing flood flow pathways are maintained, that flood risks associated with the construction phase of the development are managed, and that surface water run-off is managed as close to its source as possible’.

- 6.9. ENV2: Sustainable Surface Water Drainage, para 11.21, p375; Please add ‘where appropriate’ to the last sentence.

7. County Archaeology

- 7.1. HELAA Part 1 report, Figure 3: Approach to assessing constraints, p28-30; Archaeological Notification Areas (ANAs) are regarded as non-designated heritage assets it would be appropriate to also include provision for consultation with the Council’s Archaeological Advisor here.
- 7.2. HELAA Part 2, Chapters 1-5; RDC should double check that presence/absence of ANA’s has not changed since these allocation sites were reviewed, as ANA boundaries are reviewed periodically. The [East Sussex Historic Environment Record \(HER\)](#) should be able to double check if any ANA boundaries have been revised, added or deleted in a given time period to assist with checking only the relevant sites. For example, two ANAs have been added in the Rother District in the two years preceding this representation. It is understood, however, that it is not practical to keep the HELAA continually updated so it should be made clear that the data is accurate at the date it was produced but ANA boundaries are subject to change.
- 7.3. Heritage Background Paper, Section 1 Planning Policy Framework, p5-7; - Following the revision of the NPPF in December 2023 the paragraph numbers cited in this Paper are no longer correct. For example, in paragraph 1.9 of the report it refers to NPPF paragraph 189, which is now paragraph 195 in the NPPF. Please review against the revised NPPF and update the relevant paragraph numbers.
- 7.4. Heritage Background Paper, para 4.6, 2nd bullet point, p19; Please note the typo ‘Sussex’ should read ‘Sussex’.
- 7.5. Heritage Background Paper, para 4.15, p21; It appears that a word is missing in the following sentence; ‘..though this is **not** to diminish its architectural quality and heritage significance’.

- 7.6. Heritage Background Paper, para 6.3, p37; The final sentence should be changed to read; *'Under the provisions of the Framework, such structures **and archaeological assets** are frequently considered by the LPA to be non-designated heritage assets, either through identification in the Local Lists of Neighbourhood Plans, or during the decision-making process.'*
- 7.7. Heritage Background Paper, para 8.1, first bullet point, p40; Please note Typos: 'presenst' should read 'presents'; 'detials' should read 'details'; 'consideratison' should read 'consideration'; 'asest' should read 'assets'; 'impats' should read 'impacts'.
- 7.8. Heritage Background Paper, para 8.1, second bullet point, p40; Please note Typos: 'proectcion' should read 'protection'; 'buidlings' should read 'buildings'.
- 7.9. Heritage Background Paper, para 8.1, third bullet point, p40; Please note Typos: 'requiremnts' should read 'requirements'.

8. Public Health

- 8.1. Public Health welcomes and supports the strong emphasis and priority on health and wellbeing. There is a strong Health and Wellbeing chapter which includes an overarching policy 'HWB1: Supporting Health and Wellbeing' and a policy requiring Health Impact Assessments, there is also a clear health and wellbeing thread throughout the plan. All of which will help to create healthy places and environments which will support healthy lifestyles and reduce health inequalities. The Local Plan reflects the advice and suggestions that Public Health has made during the development of the consultation draft. Public Health's Healthy Places Team welcomes the strong partnership working with Rother District Council (RDC), recognition of this within the Plan and the supporting documents and further opportunities to work with RDC as the Plan progresses to adoption. The following comments look to further strengthen the health and wellbeing aspects within the Plan. Suggested additional text is shown in red.
- 8.2. Vision, Overall Priorities and Objectives, p19; The overall Vision could be strengthened and reflect the strong priority of the Local Plan on health and wellbeing by including the following:
*'Residents will be able to live well locally within safe, **attractive**, balanced and age-friendly communities, where residents and visitors of **all ages and abilities** can reach the facilities and services they need, often by walking, cycling and public transport **enabling all to have the opportunity to lead a healthy lifestyle.***
- 8.3. Overall Priority 2 - Live Well Locally p.23; 'What does Live Well Locally mean?' should expand on the health and wellbeing aspects by including the following:
*'Healthy, sustainable and inclusive communities that support residents across the age, **gender and ability** spectrum in terms of housing, access to jobs, services and facilities **improving physical health and mental wellbeing and enable healthy lifestyles.***
*New development that creates places that are not just visually appealing, but also inspire and foster a sense of belonging, identity, and shared experience, **reducing social isolation and creating community cohesion.***
- 8.4. Overall Priority 2 - Live Well Locally p.24; It is suggested that the Key Planning Issues should be strengthened by including the following:
- *'providing better access **by active and sustainable travel** to jobs, services and facilities across the district, and specifically supporting rural economies and communities, making them more sustainable, through meeting the needs **of residents and visitors of all ages, genders and abilities;***

- *planning for **improving** physical and mental health and wellbeing by supporting strong, safe and sustainable communities, with a community-led focus, **enabling and promoting** healthier lifestyles, reducing inequality and deprivation;*
- 8.5. Spatial Objective 1, p26; it is suggested that Spatial Objective 1 should include: **Mitigate the effects of climate change on population health.**
- 8.6. Spatial Objective 8, p28; It is suggested that Spatial Objective 8 should include: *'Enhance the sustainability and connectivity of local communities through **active and sustainable** transport measures...'*
- 8.7. Spatial Objective 9, p28; We fully support and welcome this objective and the elevation of health matters within the Local Plan. We also welcome the reference to working with the Public Health Healthy Places team to develop planning policies.
- 8.8. Green to the Core, Addressing the Climate Emergency, p31; The plan needs to recognise that climate change is the biggest threat to public health and there are health risks and impacts to the human population, across a range of development areas, especially within vulnerable groups such as young children and older people.

It is suggested all proposed policies include justifications within the supporting text that clearly sets out how developments must address the effects of climate change on population health. Mitigation measures must support maintaining and improving health and wellbeing and reducing inequalities.

It is suggested that the following key supporting documents should be referenced in the Local Plan:

- [COP28 UAE Declaration on Climate and Health](#)
- UK Health Security Agency report on [Health Effects of Climate Change \(HECC\) in the UK 2023](#)

It is suggested that other key documents that should be referenced in the Climate Change and Live Well Locally Background Paper are:

- [Spatial planning for climate resilience and Net Zero \(CSE & TCPA\)](#)
- [Health and climate change: complex problems with co-benefits \(The Health Foundation\)](#)
- [UK climate change risk assessment \(Climate Change Committee\)](#)

- 8.9. LWL2: Facilities & Services, p69-72 and HWB5: Green and Blue Infrastructure, p211-214; The Local Plan needs to acknowledge the particular environmental needs of women and girls to create safe and perceived safe and accessible places. It is suggested that this is picked up within Proposed Policy LWL2 and also within Policy HWB5: Green and Blue Infrastructure. For example include the suggested text:

iii) Play, Sports, Food Growing Opportunities and Recreational Facilities.

*'...located in prominent safe, secure, overlooked locations that can help encourage new and existing residents of all ages, **genders** and abilities to share a space.'*

The acknowledgment and need to create places for all vulnerable groups including women and girls should also be covered in ii) Public Squares and Spaces of Policy LWL2.

Criteria within either Policy LWL2 or Policy HWB5 should be expanded to include the need for developments to have regard to guidance on Safer Parks and Inclusive Spaces and Places for Girls and Young People and this should be expanded on in the supporting text. It is suggested that the following key guidance documents should be referred to in the Local Plan:

- [Safer Parks for Women and Girls Guidance \(Make Space for Girls\)](#)

- [Inclusive Spaces and Places for Girls and Young People - An Introduction for Local Government \(Homes England\)](#)

There are strong links between criteria ii), iii) in Policy LWL2 and Policy HWB5, this should be acknowledged in the Local Plan. Policy LWL2 provides the detail on health and wellbeing aspects that are missing from HWB5 on Green and Blue Infrastructure therefore a link between the policies should be provided to ensure this is recognised.

- 8.10. Proposed Policy HWB5: Green and Blue Infrastructure, p211-214; Please see the comments made under Proposed Policy LWL2 (paragraph 8.9 of this response) regarding linkages between the two policies and around ensuring spaces, including those within green and blue infrastructure definitions, are fully accessible and meet the needs of all populations groups particularly those most vulnerable including women and girls. If these points are not covered, the policy must signpost to other policies where these aspects are addressed. It is suggested that the policy as a minimum included the following:

‘Spaces and facilities designed equitably for all ages, genders, and abilities.’

It is also suggested that the policy criteria should include recognition and opportunities for multi-functional benefits therefore the following text should be included.

‘Maximising opportunities to provide multi-functional benefits for the environment, climate change and communities.’

- 8.11. LWL5: Distinctive Places, p83-88; We fully support policy requirement vii) for all developments to address the 12 considerations within ‘Building for a Healthy Life’ and its companion ‘Streets for a Healthy Life’. Policy requirement ‘v) Stewardship’ on community involvement is also welcomed. It is important that this includes all sections of the community. Therefore, it is suggested the requirement is strengthened to:

*‘b. Includes a clear participation strategy that sets out how **all sections** of the community **particularly hard to reach and vulnerable groups such as the young, women, girls and ethnic minorities** will be involved in the design and management of places, community assets and green infrastructure, including the use of participatory methods, co-design, co-production, and co-management.’*

- 8.12. Development Strategy and Principles, Vision for Bexhill, p123; It is suggested that the Vision for Bexhill should include the following suggested text:

*‘Connections and accessibility to settlements that are in close proximity to Bexhill will be enhanced through improved public transport, active travel and road networks. This will ensure that wider services and facilities can continue to be accessed, enabling residents to live well locally **and have healthy lifestyles.**’*

It is suggested that the vision should also include the following text to acknowledge the existing health inequalities in Bexhill: **There will be improvements to health inequalities and wellbeing enabling communities to lead healthy and active lifestyles.**

- 8.13. Health and Wellbeing p198- ; Public Health totally supports and welcomes the chapter on Health and Wellbeing. There is general support for all policies within the chapter.

- 8.14. Policy HWB1: Supporting Health and Wellbeing p198; It is suggested that the Policy should include the following to make specific reference to East Sussex and include a link to the [East Sussex Joint Strategic Needs Assessment](#) webpage.

*‘...health and wellbeing needs in Rother as identified in the **East Sussex Joint Strategic Needs Assessment.**’*

- 8.15. Policy HWB1: Supporting Health and Wellbeing, para 6.4, p199-200; The plan recognises the ageing population in Rother, therefore it is suggested it should

acknowledge the more complicated conditions they may experience, for example chronic disease and fall-related injuries, by the inclusion of the suggested text within Paragraph 6.4:

*'The 2021 census also highlights that Rother has an ageing population, with a median age of 53 (the second highest in England and three higher than 2011), far older than the English median of 40, **this comes with an increase in complicated conditions associated with this group of people.**'*

- 8.16. HWB2: Health Impact Assessments, p201-203; Public Health fully supports the policy to set an appropriate requirement for Health Impact Assessments (HIA) to be undertaken. The reference to the East Sussex HIA Toolkit is welcomed. Public Health is working with all Local Planning Authorities in East Sussex through a Planning for Health Working Group to create HIA Guidance within an East Sussex HIA Toolkit. This will support the implementation of HIA requirements across the County and ensure a consistent approach. Public Health will work with the Working Group to confirm the guidance, terminology, and approach to HIA, this should then be reflected in the policy and the supporting text on HIA as the Local Plan is developed through to adoption.

Public Health is committed to supporting Rother District Council (RDC) in the implementation of this policy and to continuing to work with the RDC on establishing appropriate HIA requirement thresholds.

To provide further clarity within the explanatory text the following changes, as outlined in paragraphs 8.17 and 8.18 of this response, are suggested.

- 8.17. HWB2: Health Impact Assessments, para 6.8, p202; The text is misleading and contradicts the policy requirement that an HIA must be submitted with applications. Planning applications should not be validated until an HIA is included. It is suggested that the text is changed to the following:

*'An HIA must ~~be undertaken~~ **commence** at the initial stages of the development to inform the proposal and as such the use of the Council's pre-application service is recommended to provide input at an early stage and to add value and benefit to the application. An HIA **started and undertaken later in the development of the proposal** ~~should not be conducted after a planning application has been formally submitted as this leaves less room~~ **for health issues to be identified, considered, addressed** and changes to be made ~~to a proposal and~~ **which** may lead to an application being refused.'*

- 8.18. HWB2: Health Impact Assessments, para 6.11, p202-203; It is suggested that paragraph 6.11 should be amended to clarify the requirement, in line with the policy.

*'As such, all applications for major development in ~~these areas~~ **the 20% most deprived wards** will be ~~require an HIA~~ **required to undertake an HIA screening to establish if an HIA is required.**'*

- 8.19. HWB3: Reducing Harmful Impacts on Health, p204-206; We agree with the overall policy limiting the proliferation of certain uses that may have harmful impacts on health. Making specific reference to restricting the development of new hot food takeaways is supported. We will continue to work with officers to consider other appropriate criteria for inclusion, including sharing public health data and evidence. This could include, for example, using levels of obesity (data from the Public Health Outcomes Framework), or levels of deprivation (using Indices of Multiple Deprivation) to identify where particular vulnerable and at-risk groups are located. Setting thresholds should be explored, such as locations where there are high obesity rates (that are higher than national levels) at ward level for Reception and Year 6 Children, and for adults (overweight and obese) when compared to national data. Another suggested baseline could be from 2006 when the National Child Management Plan was first conducted, for example '8% of Reception and 15% of year 6 living with obesity within East Sussex.'

8.20. Proposed Policy HWB5: Green and Blue Infrastructure, p211-212; The policy criteria should include recognition and opportunities for multi-functional benefits, therefore, it is suggested that the following text is included.

‘Maximising opportunities to provide multi-functional benefits for the environment, climate change and communities.’

8.21. INF2: Digital Connectivity, p226-227: Reference should be made to digital inclusion in paragraph 7.9. Being digitally connected can reduce the likelihood of loneliness by helping people to maintain or build new social connections, and help to maintain the independence, mental health and wellbeing of the population. This is relevant to the ageing population that the plan is actively seeking to address. It is suggested that the Local Plan, therefore, makes reference to the following documents that contain contextual information:

- [Loneliness and digital exclusion \(Age UK\)](#)
- [Tackling Loneliness through the Built Environment \(Campaign to End Loneliness\)](#)

8.22. Chapter 8. Housing, p228-315; In light of the ageing population, and to support the justification for the proposed housing policies, and the need to provide specialist and adaptable accommodation, it is suggested that the Local Plan makes reference to the following documents that contain contextual information on an ageing society:

- [The Role of Home Adaptations in Improving Later Life \(Centre for Ageing Better\)](#)
- [Supported Housing in England: Estimating Need and Costs to 2040 \(National Housing Federation\)](#)

In addition, to reflect older people’s needs, especially in relation to dementia, reference in the supporting text could be made to the [East Sussex Dementia Joint Strategic Needs Assessment](#).

8.23. Chapter 9. Economy, para 9.1, p316; It is suggested that the following text is included in paragraph 9.1 to refer to reducing health inequalities:

*‘Residents require employment, services to meet their needs, and leisure opportunities to promote health and wellbeing **and to reduce health inequalities for the population**. These requirements are essential to the overall priority to Live Well Locally.’*

8.24. Sustainability Appraisal; Public Health welcomes the integration of a set of Health Impact Assessment criteria and the emphasis this has given to the consideration of health and wellbeing within the Plan. The HIA criteria provides a systematic process to work through the health and wellbeing considerations and impacts of the local plan on the population. Public Health generally supports the conclusions of the appraisal which reflects the strong collaboration with us and the strength of policies to support the overarching health and wellbeing objective for the Local Plan.

9. Environment

9.1. Green to the Core - Addressing the Climate Emergency, p31; Suggest reference could be made to the [East Sussex Environment Strategy 2020](#), the long-term strategic environmental plan for the county, which brings together the high level aims, objectives and actions of a wide range of organisations in East Sussex, including Rother District.

Yours sincerely,



Jon Wheeler

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