

The Planning Policy Team
Rother District Council
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18 March 2026

Dear Rother Planning Policy Team,

East Sussex County Council Representations on the Rother Local Plan 'Development Strategy and Site Allocations Draft (Regulation 18) Version' consultation

Thank you for the opportunity to comment on the Local Plan 'Development Strategy and Site Allocations Draft (Regulation 18) Version' consultation.

The following are officer comments from East Sussex County Council (ESCC), which have been sub-divided into the respective statutory and non statutory roles for ease of reference. Given the nature of our response relating to each role within the County Council we were not able to follow the exact format of the response form. However, where appropriate the specific section or policy within the consultation document has been referred to. Page numbers cited relate to their location within the PDF version of the document.

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

Infrastructure Planning & Place Team,
Communities, Economy & Transport Department,
East Sussex County Council
Email: strategicplanning@eastsussex.gov.uk

1. General comments

- 1.1 Please be aware that this consultation has generated a large volume of comments from the County Council. To ensure that these comments are reflected in the Regulation 19 Plan, we request that you continue to liaise with the County Council in the interim prior to the Regulation 19 consultation period. This will enable the County Council to manage available officer resources effectively, given the numerous concurrent Local Plan consultations being undertaken by Local Planning authorities (LPAs) within the County this year. This will assist in minimising any outstanding issues remaining at the Regulation 19 consultation stage and subsequent examination, as well as to ensure that your authority reaches the government's 31 December 2026 submission deadline.

2. Transport and Highways

General comments

- 2.1 The document should refer to a Vision-Led (and Monitor and Manage) approach in relation to transport infrastructure provision. This aligns with the overall plan priorities of 'green to the core' and 'live well locally'. The Vision and Validate approach, as referred to in the current NPPF (2024) and the proposed draft NPPF (2025) requires authorities to move away from 'Predict and Provide'. As outlined in section 6 we note that the spatial sub-areas have their own vision statements and identified distribution of development. Therefore, please include reference to the need to adopt a vision and validate approach as part of this section. This will then align with the consideration of the interventions included to mitigate transport impacts. Transport impacts can be monitored over time, and additional interventions can be put in place when necessary. This comprises the 'Monitor and Manage' part of the approach.
- 2.2 The adoption of this approach would ensure alignment with the East Sussex Local Transport Plan 4 (LTP4) 2024 – 2050 adopted in October 2024. Please ensure reference to this document, which outlines the need for an 'inclusive transport system that connects people and places, is decarbonised, safer, resilient, and supports our natural environment, communities, and businesses to be healthy, thrive and prosper. It is suggested that the approach for transport in the county is more strongly reflected in the plan by referring to the vision and emphasis on planning for people and places, which will focus on enabling and encouraging integrated journeys and reducing the need to travel through land-use and planning policies that support sustainable travel. Encouraging and enabling inclusive and sustainable travel modes (walking, wheeling, cycling and public transport), adopting vehicles with cleaner fuels alongside the utilisation of emerging transport technologies will help to achieve net-zero ambitions.
- 2.3 The need to reference LTP4 is alongside the need to reference recently adopted modal strategies that support LTP4, including:
- East Sussex Rail Strategy (adopted December 2025)
 - East Sussex Freight Strategy (adopted December 2025)
 - the existing Local Cycling and Walking Infrastructure Plan (LCWIP) which is in the process of being updated, and which will be available for public consultation in late Spring 2026, and
 - the emerging Electric Vehicle Strategy.
- 2.4 ESCC will be happy to continue to work with RDC as further national guidance becomes available on adopting a Vision and Validate approach as part of local plan development and delivery, to ensure that the plan is in alignment with this approach.
- 2.5 The national and local aim is to support 50% of short journeys in towns being active (walking, wheeling and cycling) by 2030 and to ensure that new infrastructure and developments are designed with active travel at the forefront. The review of the existing East Sussex LCWIP will be critical in contributing to the support of sustainable development in the district of Rother. ESCC will continue to work with RDC to identify new opportunities to support active travel connectivity or enhancements to existing active travel infrastructure to support sustainable development through the identified allocations.
- 2.6 A proposed active travel network for the Rother District area is focussed on the key settlements, and this will be available to publish at Regulation 19 stage. As highlighted

above, the draft LCWIP will be published for a public consultation during late Spring 2026 and will only include reference to those local plan sites as confirmed by RDC.

- 2.7 Reference to parking throughout the document should refer to the relevant [parking standards](#), noting that adequate parking will be required in new development. You may also wish to ensure alignment with forthcoming NPPF guidance on parking to future proof general policy and site allocation policies.
- 2.8 Any reference to the existing transport modelling should note that this is at an interim stage, based on the information available at the time. Future stages of modelling to support the Regulation 19 Plan will be able to consider the potential effects of the proposed allocations in more detail.
- 2.9 The recently adopted East Sussex Freight Strategy includes Priority Area 4, which includes measures related to 'Planning and Policy'. This highlights the inter-relationship between land-use and transport planning and the direct impact on freight and servicing activities and the need to consider freight and servicing when developing local plans and planning new developments. Whilst we acknowledge that this strategy is in an early phase of delivery, we strongly suggest reference to the opportunities for sustainable freight opportunities and servicing as part of section 6.
- 2.10 These could include more strategic opportunities to support more sustainable movement of freight across the emerging Sussex and Brighton Combined County Authority (SBCCA) in the future, including:
- identifying and protecting sites within local plans for rail freight infrastructure and network capacity, lorry parking, freight warehouses and distribution centres, HGV recharging, and alternative fuel refuelling sites,
 - introducing more localised measures including the use of the planning process where developments are of a certain size to reduce construction disruption, and
 - improve sustainability of new developments, including support and access of using e-cargo bikes or more sustainable vehicles for deliveries in the last mile to reduce HGVs and other vehicles from making deliveries to the home/businesses.
- 2.11 More mention of electric vehicle charging facilities and infrastructure needs to be made throughout the Plan, including consideration of shared community charging facilities for new development. For example, this could be included in the Policy References section in Part 4. 7. Site Allocations.
- 2.12 We welcome inclusion of the timely delivery of infrastructure. It is important to embrace an infrastructure first approach - especially before the occupation of new dwellings to instil early habits. Also, the importance of 'new' infrastructure to support development alongside improvements to existing infrastructure needs to be mentioned.

More specific transport comments are addressed below:

- 2.13 In the Strategic Objectives, we agree with the revised strategic objectives, subject to an amendment to Strategic Spatial Objective 8, which also requires reference to electric vehicle charging infrastructure.
- 2.14 We believe that Figure 3 in the online version of the draft plan uses the wrong table as it is indicating the strategic spatial objectives, and not Rother employment requirement (2020-2040) as per the figure heading. It appears that the correct table is used in the pdf version.
- 2.15 In paragraph 3.4.3 - Duty to co-operate and meeting local needs, please consider mentioning the opportunities to integrate the 'Vision and Validate' approach as part of

this as this includes the opportunities for community engagement to build consensus and take into greater consideration local needs.

- 2.16 Figure 6 needs to include reference to 'wheeling' alongside walking and cycling, and electric vehicle charging infrastructure and facilities.
- 2.17 Paragraph 5.9 should include reference to wheeling.
- 2.18 The vision for Bexhill should include reference to:
- 'wheeling' in relation to walking and cycling routes.
 - electric vehicle charging infrastructure to support a shift towards the uptake and use of electric vehicles.
 - the opportunities for rail and bus service and infrastructure improvements.
 - Where sustainable transport options are referenced include 'integrated' as part of this text.
- 2.19 Paragraph 6.3.2, point 4 – include additional text where it states 'across Bexhill as a whole (including key transport hubs, specifically Bexhill rail station)
- 2.20 In the vision for Southern Rother and the Hastings Fringes, please mention the opportunities for electric vehicle charging infrastructure.
- 2.21 In the vision for Battle and Surrounding Settlements, please ensure reference to the opportunities for connecting settlements to key services, facilities etc. by active travel and public transport.
- 2.22 The second paragraph in the vision for Rye and the Eastern Settlements Cluster needs to refer to wheeling alongside walking and cycling. Please also reference Rye rail station, including the opportunities for improved access from the station to settlements, key services, facilities and education / training by walking, wheeling and cycling.
- 2.23 In the vision for Northern Rother it is pleasing to note that there is good reference to walking, wheeling and cycling and rail stations, and mention is made to electric vehicle charging. However, please ensure reference to bus services.
- 2.24 In the vision for the Countryside, there is no reference to improving access to the countryside by active travel and public transport and supporting infrastructure (i.e. bus stop waiting facilities or cycle parking).
- 2.25 Part 5, Appendices, Appendix 1: Council Motion on draft Policy LWL7 – Streets for All - In A (i) proposed supporting text, in the third sentence add 'wheel'. It is also recommended to make reference to the Vision and Validate approach.

General Transport and Highways comments on proposed site allocations:

- 2.26 Site allocations should require the transport requirements and impacts to be addressed and making proportionate financial contributions to, or direct provision of, active travel accessibility and /or public transport provision. In addition, parking for car and cycles should be considered in accordance with the County Council parking standards. Sites such as in central Bexhill [Town Hall and other sites with mixed use allocations] should indicate preference for either unallocated parking, shared parking or whether they have potential to be car free. In such cases it would be relevant to indicate that unallocated parking needs to be supported with a parking strategy.

In regard to the Local Plan Sites please see the following comments:

- 2.27 BX6 Bexhill Town Hall – is there a definitive promotion of the site allocation to be car free? As there is no mention of a parking strategy for both the residential and office uses, there should be reference to this being a ‘car-free’ development with an emphasis on the need to utilise/improve pedestrian/cycle use and access to public transport.
- 2.28 BX15 – improvements to public footpaths do not necessarily upgrade a footpath to a bridleway so having a policy section (3) that is specifically requiring a route suitable for cyclists may not be achievable. There is a surfaced route that links to Foxhill, but even then, that may be limited to being used on foot due to its width, with cyclists having to dismount. Contributions towards public transport should be included given there is a poor presence of buses and this would allow funding to be available for the Flexibus service.
- 2.29 BX20 - typo in site name [Bexhil].
- 2.30 BX21 - typo in name [Barnhorne or Barnhorn].
- 2.31 BX34 – add bus service contributions.
- 2.32 BX36 - (4) change the reference to local highway authority, rather than East Sussex Council; (5) does not make sense -there is a shared footway/cycleway on the east side of Watermill Lane (not western) which connects to a Pegasus crossing to Watermill Lane south on Haven Brook Avenue. Additional crossing points may be required.
- 2.33 BX37 - (6) should include extension of the Non-Motorised User (NMU) provision on the north side of Ninfield Rd/Haven Brook Avenue to connect the site. This could be a shared footway cycleway based on discussions on infrastructure improvements from pre-app (land south of Chestnut camping grounds).
- 2.34 BX38 - (2) remove the ‘or’; developers will be asked to deliver infrastructure and contribute to service enhancements for buses and potentially schemes that have been designed but not fully funded. (5) re-word to read ‘provide pedestrian and cycling infrastructure to allow linkage between the site and existing network infrastructure or network infrastructure that has been otherwise secured.
- 2.35 BX39 – For information, the site is currently subject to a highway pre-app for the southern part of the site, no school has been included. (7) re-word to read ‘provide pedestrian and cycling infrastructure to allow linkage between the site and existing network infrastructure or network infrastructure that has been otherwise secured or identified through an accessibility assessment’.
- 2.36 BX41 – are there any policies relating to access? Will sports and recreational uses share the same access? There is also no mention of pedestrian/cycle infrastructure or parking.
- 2.37 BX47 (1) include contributions to bus services (2) and make reference to the highway authority.
- 2.38 CR1, CR2 and CR3 – no reference to parking in each of these allocations, please include.
- 2.39 IK2 – ideally an access from Orchard Close is preferable, but this is a private road and will require 3rd party consent. This is a National Highways matter.
- 2.40 WS3 and WS5 – include the need to provide bus service contributions, upgrade of bus stops and safe and suitable access to reach closest bus stops on the A28.

- 2.41 BT1 – include the need to provide bus service contributions, upgrade of bus stops and safe and suitable access to reach closest bus stops on Hastings Road.
- 2.42 BT2 Breadsell Farm - Include provision of a suitable link to the Public Right of Way (PRoW), which is referenced: Crowhurst 21a. There may be opportunities for cycle links onto the A2100. The road does not have any suitable designation for cyclists.
- 2.43 BT6 and BT7 – there will likely be a request for bus service contributions for each of these.
- 2.44 BT9 - there will likely be a request for bus service contributions. There should also be reference made to the need to review the highway in terms of vehicle speeds and potential extension of the speed limit to support the extension of the built up area.
- 2.45 BT10 - Hastings Road is 40mph and an HGV route and not suited to regular cycling. There will likely be a request for bus service contributions, and bus infrastructure, along with access improvements to reach them.
- 2.46 CT1 – there will likely be a request for bus service contributions and upgrades to bus stops.
- 2.47 CT2 - there will likely be a request for bus service contributions and upgrades to bus stops. Vehicle access provision agreed.
- 2.48 CT3 there will likely be a request for bus service contributions.
- 2.49 NE1/NE2 – there is likely to be a request for bus service contributions and bus stop upgrades.
- 2.50 SD2 Sedlescombe Village Hall - access for cyclists and pedestrians indicated as via Church Hill. It is unclear which street this is referring to and we assume it is the same as Balcombe Green. Footway widening likely to be sought towards the village core.
- 2.51 SD3 Sawmill – B2244 derestricted speeds, noted as being in Neighbourhood Plan, speeds are derestricted and new development will intensify vehicle turning movement onto B2244. New access will need to be assessed in terms of safety. The site is motor vehicle reliant, no footways, no bus stops, no cycle routes other than on carriageway.
- 2.52 SD5 Gate Cottage – there is insufficient highway land or land in site to provide a full width footway to connect with Eton Walk. We request a policy requirement for a crossing point to reach east side of The Street (where improvements will be required to footway width).
- 2.53 SD8/SD9 – increase of employment floorspace should ideally be supported with public transport. A travel plan cannot support vehicle dominant development in a rural area without genuine choices.
- 2.54 SD10 and SD11 – bus service contributions likely to be requested for each of these.
- 2.55 BC2 east of Hobbs Lane – this site does not have any pedestrian infrastructure, nor is there any available highway land capable of providing a suitable link to the existing footway. Third party land will be needed to deliver any meaningful footway provision either along the frontage or to connect to the rear of Coombs Close (Optivo land). (4) in policy text would be potentially difficult to achieve. Bus service contributions are likely to be sought.
- 2.56 BR1/BR2/BR3 – bus service contributions likely to be requested and possibly new bus stops and infrastructure.

- 2.57 CM1/2 - bus service contributions likely to be requested and possibly new bus stop infrastructure.
- 2.58 PE2/PE3/PE5 Peasmarsch - bus service contributions are likely to be requested, and possibly new bus stops and infrastructure. Noted that PE2 has planning permission, but if this lapses then there should be scope to request the appropriate service and infrastructure improvements.
- 2.59 RY3 – infrastructure should include bus stops so that the occupants of apartments for older people can access public transport (although noting that these are likely to need to be on trunk road, so will need the agreement of National Highways).
- 2.60 RY4 – upgrades to bus stops and services will be required.
- 2.61 RY5 – Public transport and service contributions likely to be required.
- 2.62 RY6 – reference to parking provision should be made.
- 2.63 BW3/BW4 – provision of a public footway behind a frontage hedge should allow for maintenance and be visible to drivers using the access, and hedge height should be sufficiently low. Having a footway should connect to an existing provision.
- 2.64 HG1/HG2 – the planning permissions relating to these sites will lapse soon (in 2026). The highway requirements secured in the s106 agreements related to these permissions should be reflected in these site allocation policies and include bus service contributions as necessary.
- 2.65 HG3/HG4 – bus service contributions are likely to be required.
- 2.66 RB1, RB3, RB6a and RB6b – bus service contributions are likely to be required.
- 2.67 RB2 – the planning permissions relating to these sites will lapse this year, so a refresh is required and a review needed on bus services, which will likely require contributions to improve services.
- 2.68 FW1 - bus service contributions will be required.
- 2.69 FW2 – bus stop upgrades in the form of Real Time Passenger Information (RTPI) and service contributions are likely to be sought.
- 2.70 TC1 Steellands Rise - bus stop upgrades (RTPI) and service contributions are likely to be sought. Query the criteria to link towards Tinkers Lane as the land does not connect up to it (9).
- 2.71 SG2 – this site is constrained by Bardown Road and the available extent of highway to deliver appropriate footway links to the south to Station Road or crossing points to reach the existing footway network. Unless there is acquisition of 3rd party land, the site cannot provide suitable access provision to reach the school – we would request that this matter is explored further should the Council be minded to take the site forward to its Regulation 19 plan. Public transport is limited apart from Flexibus whose provision is subject to funding being available.

3. Rights of Way

- 3.1. In response to Q5, page 40 of the Rother Local Plan Development Strategy and Site Allocations Draft (Regulation 18) Version and in line with Paragraph 105 of the NPPF, planning policies and decisions should ensure the protection and enhancement of public

rights of way and access. This includes taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks, including National Trails.

4. Education

- 4.1 Births in East Sussex peaked at 5,500 in the academic year 2010/11. Since then, countywide births have fallen to below 4,300 in 2022/23. Based on historic patterns of 11–13-year cycles of peaks and troughs, birth numbers may begin an upward cycle soon. However, the declining fertility rates currently being witnessed not only in East Sussex, but in most of the UK and in many parts of the world, may mean that previous cyclical patterns are not repeated. Births in East Sussex for 2023/24 were around 80 up on the previous year, but it is not clear whether this is an anomaly or marks the start of a prolonged recovery.

Primary and early years provision

- 4.2 The fall in countywide births is reflected in falling primary reception (Year R) intake numbers, at least until 2027/28. The local authority's latest pupil forecasts are showing numbers beginning to recover beyond this point. However, intake forecasts beyond 2028/29 are based on demographic projections of future births rather than actual live births or GP registration data and are less certain. Even if births do continue to follow their normal cyclical patterns, we may not see high Year R numbers across the county generally until the 2030s. In areas where high volumes of new housing are planned, primary intake numbers may rise sooner than in other areas. The two areas most likely to be affected by the planned housing growth are:

Bexhill

- 4.3 Currently there is spare capacity in early years settings and primary schools in the town. However, the high volume of housing proposed for Bexhill together with a general upswing in future births will begin to put pressure on existing provision during the plan period.
- 4.4 Given the quantum of new homes proposed in the West Bexhill Growth Area, ESCC welcomes the inclusion in policy BX18 and, more specifically, BX27 (Beeches Farm and land north of Barnhorn Road), of a new primary school with early years nursery provision to serve the West Bexhill area.
- 4.5 In view of the volume of new homes proposed in the North Bexhill Growth Area, ESCC supports the inclusion of a new primary school with early years nursery provision in policy BX29 and, more specifically, either BX37 (Land north of Haven Brook Avenue (west)) or BX39 (Land west of Ninfield Road).
- 4.6 ESCC acknowledges reference in policy BX45 to the ongoing need for a new primary school with early years nursery provision to serve the development at Worsham Farm.

Battle

- 4.7 Battle and Langton CE Primary School is full to capacity. In most intake years the school admits significant numbers of children from out of area. In future years, the school admissions system will prioritise in-area applicants from the new housing over out of area children to help reduce pressures from the children arising from new housing on intake numbers. A bigger challenge is that of primary age children who move into the new homes requiring a place in other year groups that are already full.
- 4.8 Therefore, it is possible that additional capacity (permanent or temporary) might be needed within the area to cope with the demand generated by the new housing.

- 4.9 Additional early years nursery provision is also likely to be required in Battle to serve the planned new homes.

Rural areas

- 4.10 As noted in paragraph 6.84, a number of rural primary schools in the district are operating under-capacity. East Sussex County Council (ESCC) welcomes reference to appropriate growth in these villages as an important factor in securing the long-term viability of these schools and communities.

Secondary provision

- 4.11 Earlier high numbers in primary schools were reflected in rising Year 7 secondary school intakes until 2022/23 when they peaked. Year 7 intakes across the county are now in decline.
- 4.12 The area most likely to be affected by the proposed housing growth is *Bexhill* - Year 7 Intakes to Bexhill High Academy and St Richard's Catholic College are expected to be close to their combined Publish Admission Number (PAN) of 500 for the remainder of the decade before beginning to fall away. However, the volume of new homes planned for the area combined with an upturn in the birth rate, could put pressure on places later in the plan period and lead to the need for additional secondary school capacity.

Special Education Needs

- 4.13 In 2024/25, the number of school aged children (aged 4-18) in East Sussex with an Education, Health and Care Plan (EHCP) was 4,481. There were also 412 young people aged 19-25 with an EHCP who need continued support to transition to adulthood.
- 4.14 Over the next four years, the local authority forecasts that overall numbers of school aged children with EHCPs will grow, by around 22%, to nearly 5,500.
- 4.15 As part of its Special Educational Needs and Disability (SEND) place planning strategy, ESCC is delivering more SEND provision to meet the growing demand for places. A key priority is developing more specialist facilities in mainstream schools, supporting schools to be more inclusive and for children to be educated alongside their peers in their local communities. The quantum of new homes planned across the district during the plan period is likely to have a significant impact on the growing demand for SEND provision.

General

- 4.16 Where new education provision is required to serve housing growth, ESCC would expect Section 106 and/or CIL contributions to be prioritised towards the cost of providing new places.
- 4.17 ESCC reserves the right to periodically review and update the information provided above as new data becomes available which might change the position described in a particular area(s) of the district. Information will be provided as required in future versions of the School Organisation Plan which is published annually and in subsequent updates to the Infrastructure Delivery Plan.

5. Flooding

- 5.1. Draft policy ENV2 (sustainable surface water drainage), the strategic spatial objectives which refer to climate change adaptation, the need to reduce flood risk, and the promotion of the multifunctional benefits of blue green infrastructure, combine to provide a framework to consider local flood risk management and development. There is little doubt that the issue is a strategic priority for the District Council.
- 5.2. Nevertheless, there are inconsistencies in the way the draft document treats the matter of Sustainable Drainage design and local flood risk.
- 5.3. For example, just under half of the policy references relating to site locations make no mention of SUDs or sustainable drainage requirements, although drainage matters would need to be considered. It is less than clear why this is the case. This inconsistency can be partially explained by the presence of strategic policies (such as BX1, BX18 and BX29) which set out SuDS requirements for several sites, but the issue needs to be addressed.
- 5.4. Conversely, some site allocations which fall under these strategic policies also include generic references to SuDS references. Again, this demonstrates an inconsistency in policy drafting and should be addressed.
- 5.5. Of note is the tendency of several policies to dictate the location of sustainable drainage measures within a site. These appear to be in response to the topography of the site and/or the presence of onsite surface water flood risk, but there is no information/evidence to support these design choices. It is a principle of good SuDS design to deal with water where it falls, the requirements of these policies run counter to that principle and should be removed. If necessary, such preferences should be restricted to the supporting text.
- 5.6. In a limited number of cases, the policy requirements refer to a drainage strategy to be agreed by the LPA. Given that a Drainage Strategy is a standard requirement, it is not clear why it is worthy of mention for handful of sites and not others. To avoid confusion these references should be removed.
- 5.7. The scope for infiltration SuDS in the district is limited by a combination of high groundwater levels and impermeable geologies. This means that more space may be required for attenuation than previously thought by developers or landowners. Secondly where there are concerns over land stability it should be made clear that infiltration SuDS will not be considered as they risk exacerbating the problem. Given this, we would support a level of flexibility being applied in the capacities being quoted for the site allocations.

Planning for drainage and Landscape Assessments

- 5.8. Throughout the site allocation section there are references to Landscape Assessments necessary to inform the layout and form of the development. It should be noted that how water flows through a catchment and a site should also be a factor to consider early in the design process.

Flood Risk Assessments (FRA)

- 5.9. Several site policies refer to the need for an FRA to be prepared, but this is not applied to all sites which would require an FRA. For example, policy EC1 emphasises the need for an FRA and for development to be guided by its findings. This is not surprising given the risk posed to part of the site by the River Dudwell. However, BX24 a site of over 3 hectares makes no mention of this requirement although an FRA would be expected given the site's area. If this was simply highlighting the fact that some sub one hectare

sites will require an FRA this would be understandable, but site size is seemingly not a factor. There should be a consistent approach to applying this requirement.

Consultation with the Lead Local Flood Authority (LLFA)/Pevensey and Cuckmere Water Level Management Board (PCWLMB)

- 5.10 Policies BX25 and FW2 refer to the need to involve the LLFA in agreeing the drainage strategy for these sites. However, FW2 refers to “in conjunction” whilst BX25 refers to “in consultation” with. The former implies that the LLFA will be part of the design team. This is misleading, the LLFA reviews drainage designs/strategies, and the word “consultation” should be used.
- 5.11 Furthermore, it is not clear why these two sites warrant such specific attention when the LLFA will review drainage strategies for all major proposals in line with its statutory duty.
- 5.12 Finally, there is no reference to the PCWLMB and its role in advising on development proposals within its catchment. Please ensure that this is referenced.

6. Culture and Tourism

- 6.1. Live Well Locally, Key Planning Issues, para 2.13, p24 - We welcome the commitment to provide better facilities for sports, leisure, culture and tourism to meet the needs of the local community and those visiting the area. This is supported by the East Sussex Cultural Strategy priorities and the Creating Healthier Lives Strategic Action Plan.
- 6.2. We welcome Policy BX2 as it aligns with other complimentary transport and cultural infrastructure investment made and supports sustaining and developing a cultural area in the town around the Grade I Listed De La Warr Pavilion. This includes improvements to the quality of the public realm to complement the arts, culture and tourism offer.
- 6.3. 6. Development Strategy for Rother - Vision for Rye and the Eastern Settlements Cluster p.84 - The commitment to promoting key tourism areas such as Camber is welcomed. Although consideration should be given to the impact of increased visitor numbers on the local community and ecology.
- 6.4. Policy Reference: CM2 p.406, Site name: Land at the Central Car Park, Old Lydd Road, Camber - The newly opened Camber Welcome Centre aligns with the tourism amenities at Camber. We would welcome consideration for any further development of this site for visitor accommodation and tourism, considering any impact on the local community and wildlife.
- 6.5. Policy Reference: SD2 p.359, Site name: Land at Church Hill Farm, North of Village Hall, Sedlescombe - Any development should not impact access to, or the use of, the Village Hall, as per priority 1 of the ESCC Cultural Strategy 2012-2025, which looks to “Create an environment where great cultural experiences are available to everyone to enhance their quality of life”. This also aligns with the “Pride in Place” commitment – which seeks to continue to grow cultural opportunity and build a cultural ecosystem which gives local people opportunities to participate, collaborate and renew - in the East Sussex Cultural Prospectus due to be published in March 2026.

7. Public Health

- 7.1. Public Health welcomes and supports the latest changes made to the Strategic Spatial Objectives, that now include references to climate change mitigation, active travel, and achieving safe, healthy vibrant and mixed communities. These elements help to strengthen and reflect the strong priority of the Local Plan on health and wellbeing.

- 7.2. Public Health also welcomes and strongly supports the approach to healthy placemaking through the requirement for a master-planning approach within both the West and North Bexhill Growth Area Policies, as well as individual site allocations within other settlements.
- 7.3. Where references are made to a master-planning approach, the principles outlined will help to support the delivery of necessary social and community infrastructure. In particular the provision of essential facilities and services to support the Growth Areas within Bexhill, as sites are of considerable distance from existing centres. This will help to create healthy and sustainable communities.
- 7.4. Healthy neighbourhoods require a range and variety of local services and facilities. These include shops, education, health, sports and leisure, recreational, cultural and community facilities. These should meet the varied necessities of the community, support everyday needs and encourage healthy lifestyles. Essential everyday services and shops are particularly important for those without access to a car, such as older people and children.
- 7.5. The Local Plan states that parameters for master-planning will be developed further, and will be informed by additional evidence documents, following this second Regulation 18 consultation. Public Health wishes to be involved within any future master-planning processes to ensure that health and wellbeing opportunities are fully maximised, along with opportunities to positively address areas of deprivation in the Sidley area.

8. **County Archaeology**

- 8.1. In reference to Strategic Spatial Objective (p17) and response to Q1: - please reword point 3 to include archaeological heritage. '3. Promote high quality, inclusive design and protect and enhance the significance of Rother's built, archaeological and natural heritage, including its setting, while providing opportunities for recreation and tourism.'
- 8.2. With regard to Q9, in respect of High Weald National Landscape (HNWL). Paragraph 6.3 on p53 refers to 'The first draft Local Plan (2024) included Proposed Policy GTC9'. Other important aspects of the HNWL include history and archaeology (see [About the landscape - High Weald National Landscape](#)) and these topics/themes should also be listed alongside 'distinctive landscape character, ecological features, settlement pattern and scenic beauty' under Policy GTC9. These topics/themes are covered by OBJECTIVE FH4 of the [AONB Management Plan](#).
- 8.3. Q20 to Q66 - No specific comments other than to note that all major development applications (including brown field sites) should be supported by a desk-based heritage impact assessment, including Historic Environment Record (HER) data, as required under NPPF 207 and SDS1 and SDS2. This is mentioned in relation to some sites but not all. The requirements for supporting heritage documentation for any proposed non-major development sites that are located within Archaeological Notifications Areas should be established by the applicant/agent via consultation with the County Archaeologist.
- 8.4. Appendix 2: Glossary would benefit from including:
- **Designated Heritage Assets** which NPPF defines as '*A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.*'
 - **Heritage Assets** which NPPF defines as '*A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in*

planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).'

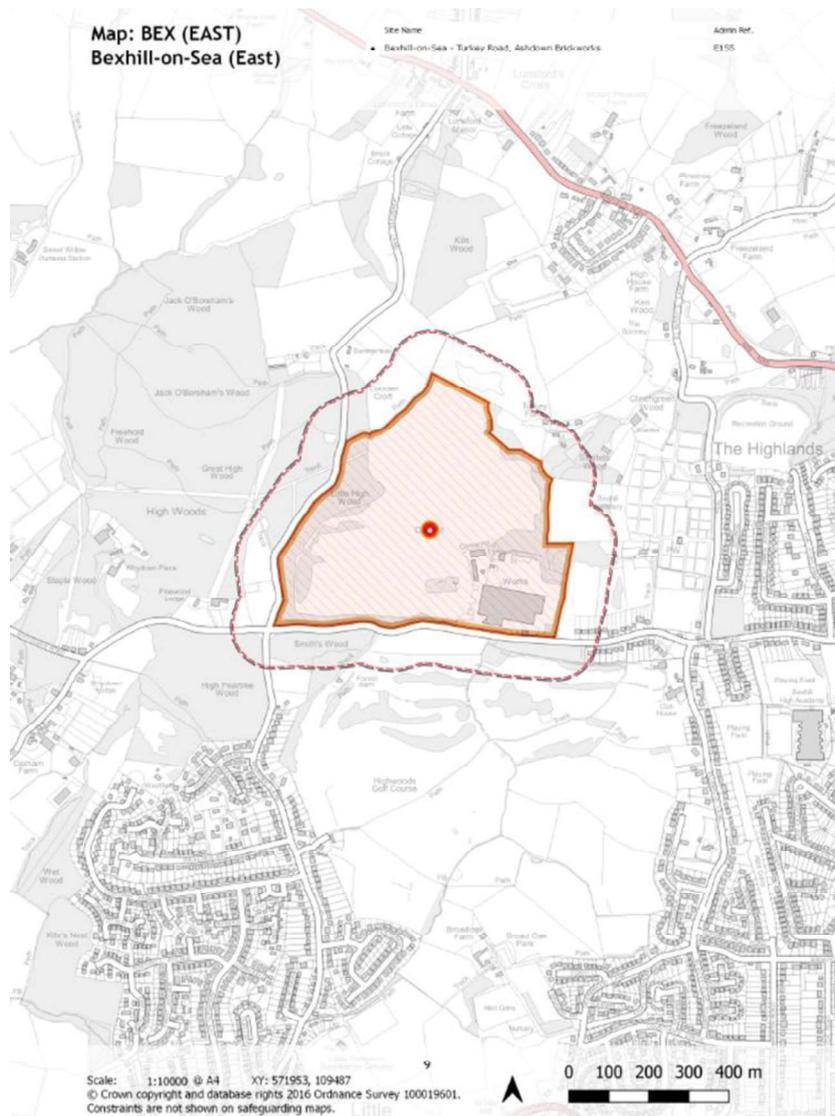
9. Waste and minerals

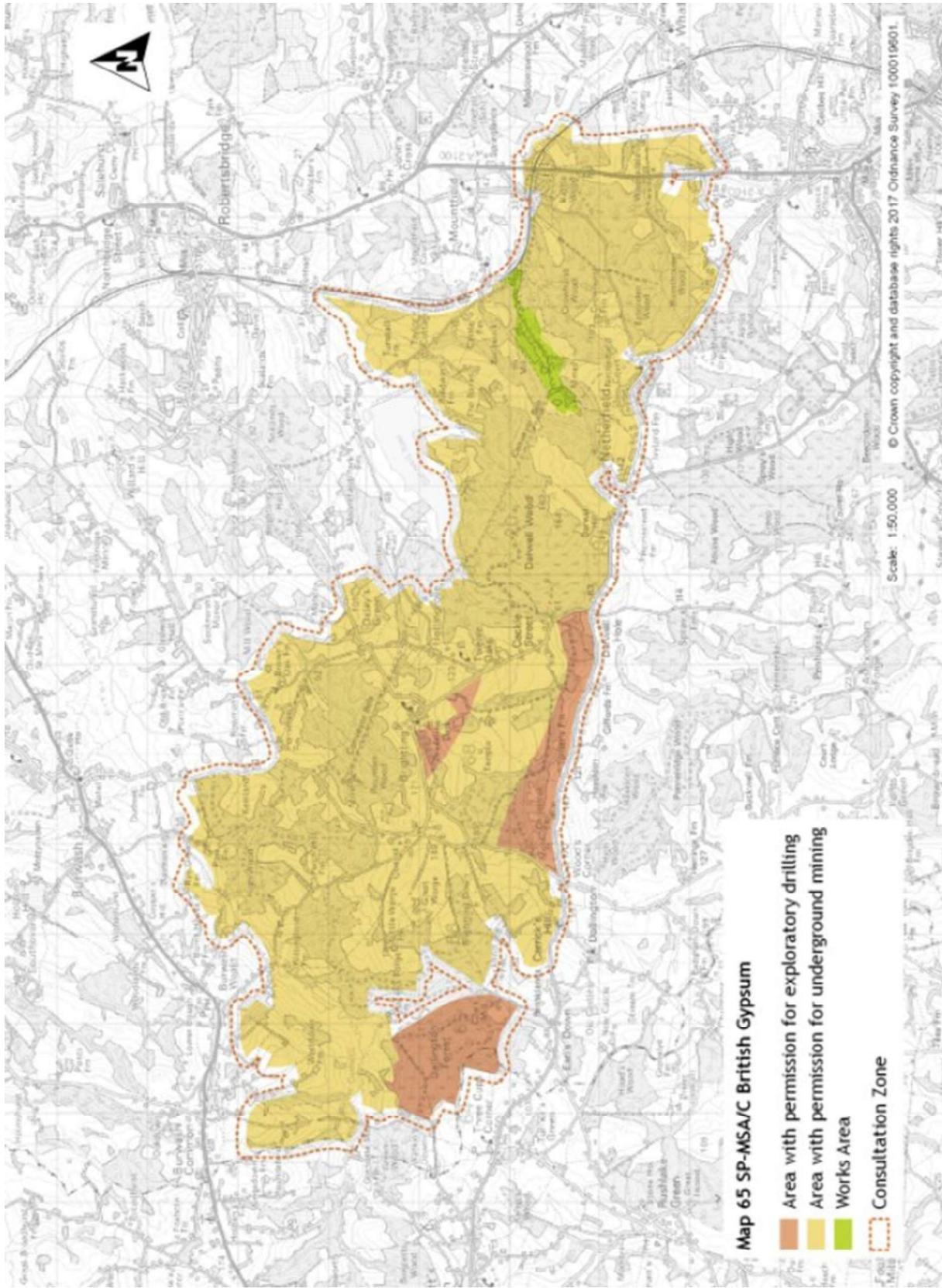
- 9.1. Rother District Council and East Sussex County Council are committed to maintaining effective cooperation where it comes to ensuring that planning policies align. Paragraph 27(a) of the NPPF (December 2024) stipulates that plans should ensure that a consistent approach is taken to the delivery of major infrastructure, which includes minerals infrastructure. Paragraph 28 also requires that to demonstrate effective and on-going joint working, strategic policy-making authorities should prepare and maintain one or more statements of common ground (SoCG), documenting the cross-boundary matters being addressed and progress cooperating to address these.
- 9.2. In light of this, during the preparation of the Waste and Minerals Local Plan (W&MLP) Review: Revised Policies document (adopted October 2024) a SoCG was signed by all districts and boroughs within East Sussex, including Rother District, in 2022. The purpose was to recognise the strategic matter of minerals provision and the importance of maintaining a steady and adequate supply of minerals, in East Sussex. By signing the SoCG, Rother District Council also agreed (under paragraphs 15 and 17) that:
- *when preparing a local plan or policy document, or when determining a relevant planning application within a safeguarding consultation area, appropriate weight will be given to safeguarded minerals infrastructure sites; and*
 - *making any allocation that may affect a safeguarded minerals infrastructure site could constitute a strategic matter which would need to be addressed through a SoCG between the relevant parties. This would be assessed on a case-by-case basis, proportionate to the effects on the particular infrastructure site.*
- 9.3. Comments on the following draft policies and supporting text are provided within the context of waste and minerals safeguarding:
- Draft Policy BX29 site allocations for the North Bexhill Growth Area, Bexhill (BX39).
 - Draft Policy BX35: Land at Levetts Wood and Oaktree Farm, Bexhill.
 - Draft policy GU1: Land North of A265, Ivyhouse Lane, Hasting.
 - Draft allocation GYP4: Land adjacent to Fir Tree Cottage, Netherfield Hill, Battle.
 - Draft allocation GYP6: Land adjacent to Valentine Ridge, A2100, Mountfield.
 - Draft allocation RH1: Land at Stoneworks Cottages, Rye Harbour.
- 9.4. The Rother Local Plan proposes several allocations that are likely to impact upon a safeguarded waste or minerals site. On this basis and with the commitment made through the SoCG that was signed by the District Council in 2022, the Minerals and Waste Planning Authority would like to see wording strengthened in the policy and/or supporting text wording to reflect this constraint. It is also unlikely that the Minerals and Waste Planning Authority can support the full extent of proposed allocation (BX39) due to the proximity of residential development to the operational quarry at Ashdown Brickworks. More specific detail is outlined in the following comments.

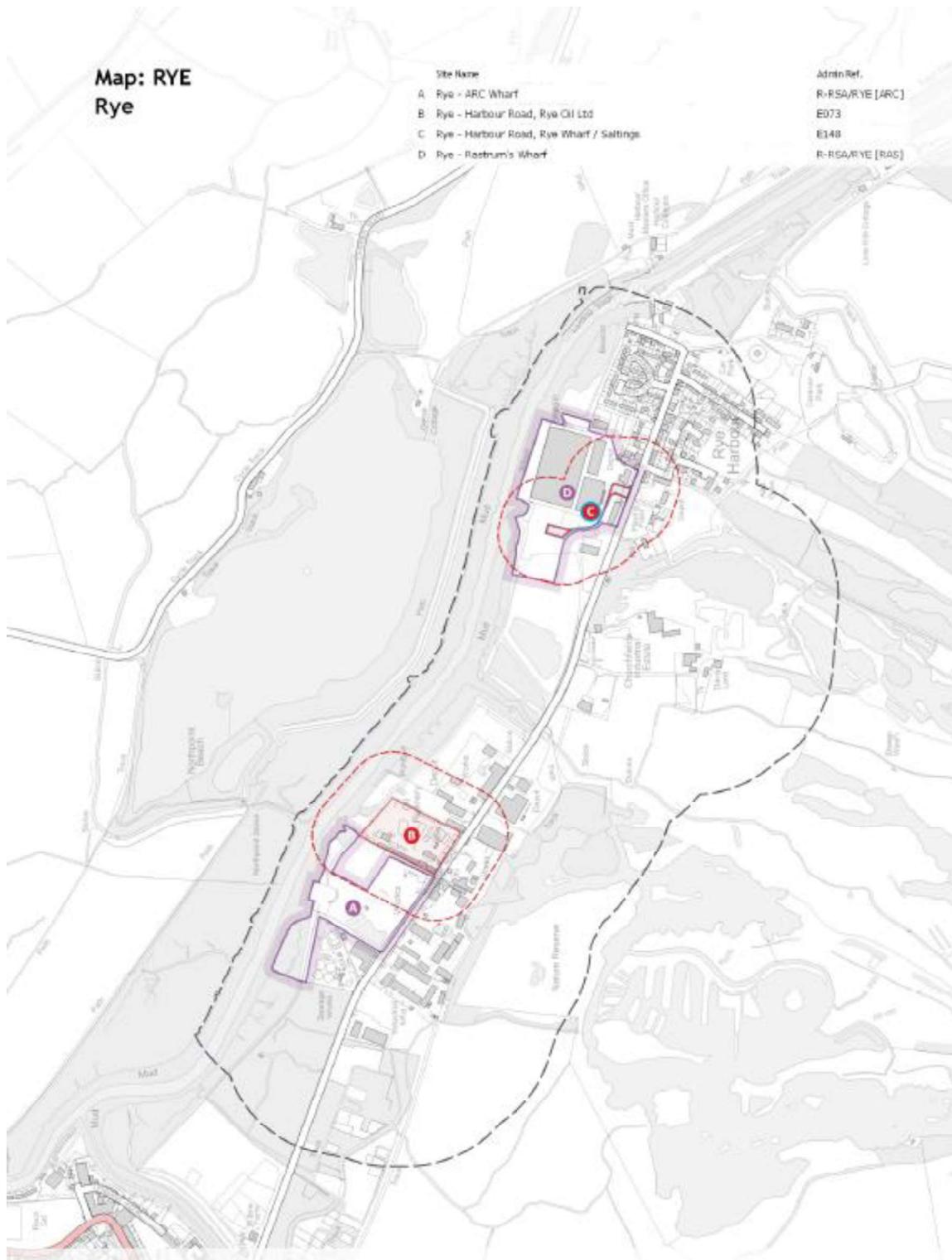
Safeguarded Minerals and Waste sites in Rother District

- 9.5. The policies map (October 2024) (see below) shows all relevant Minerals Consultation Areas (MCAs) and Waste Consultation Areas (WCAs) within the Plan Area. Through this consultation we have identified three safeguarded sites/areas that are likely to be impacted by proposed site allocations in the Rother Local Plan. These are shown below and include:

- Safeguarded site at Ashdown Brickworks
- Safeguarded land for Brightling Gypsum Mine
- Safeguarded sites at Rye Harbour







Comments on Draft Policy BX29: North Bexhill Growth Area – Infrastructure Policy (Q24.)

- 9.6. Draft policy BX29 considers a wide, area for strategic growth, which has been considered since 2006. Within this area lie several site allocations that are proposed to be reallocated where they may not have come forward under the previous Local Plan. Of relevance to the Minerals Planning Authority (MPA) however is proposed allocation BX39 (Land West of Ninfield Road, Bexhill). The southern area of this allocation lies within an MCA and WCA for Ashdown Brickworks (Figure 1). The MCA/WCA is 100m from the permitted quarry boundary.
- 9.7. The proposed site allocation boundary is adjacent to the permitted and safeguarded brick clay quarry at Ashdown Brickworks, with its southern boundary running immediately adjacent to that of the quarry. Ashdown Brickworks is operational and is permitted to

continue to operate until 2051. However, should the working not be completed by this date, the operator could apply to extend this. It is one of only a few brickworks in the county and its continued operation is essential for the supply of bricks for construction projects in the area. For this reason, the site is safeguarded against development for non-minerals development under Policy RM3: Minerals Safeguarding Areas.

- 9.8. It is also considered as a safeguarded waste site owing to the brick recycling operation that also takes place on site. Therefore, Policies SP6 and WMP6: Safeguarding Waste Sites also apply. These policies seek to ensure that where non-waste development is proposed, account is taken of the need to safeguard waste management capacity and avoid constraining its operation.

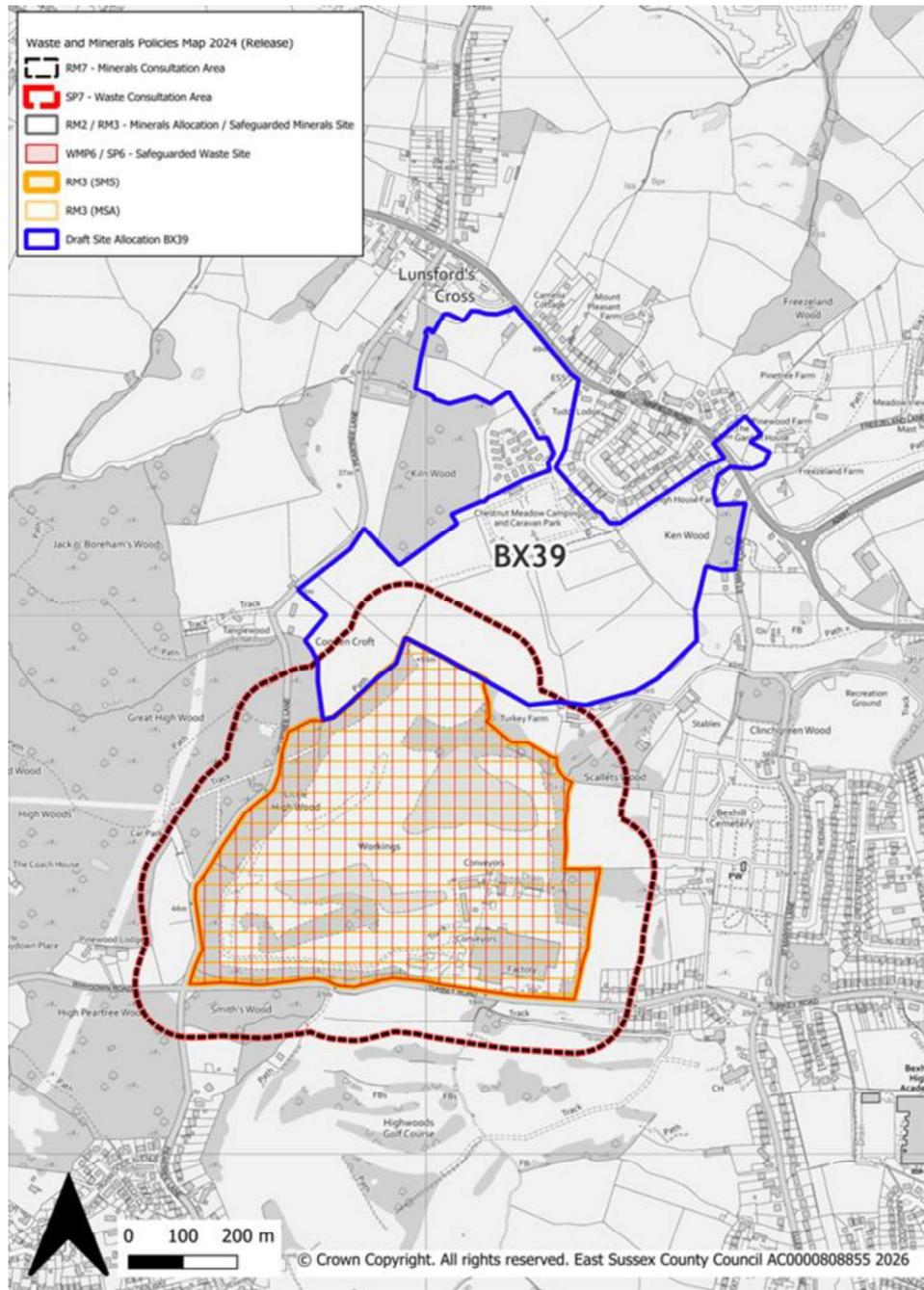


Figure 1: Land West of Ninfield Road (BX39) and the MCA/WCA.

- 9.9. The brick clay quarry operates a campaign method of extraction, where quarrying occurs for short intense periods, which then is used in a more consistent production of bricks. Brick clay is worked from the quarry in phases. The phases nearest the southern boundary of

allocation BX39 are currently occupied by interburden (sand) and topsoil stockpiles. The area of the quarry known as 'Pevensey Pit' lies in the northern section of the site, bounded by existing woodland. There remains a significant amount of brick clay to be extracted and, according to approved plans, extraction, and the following restoration, within the northern phase is yet to commence.

9.10. The nature of these operations is such that they can give rise to potential impacts associated with noise, vibration, dust and visual amenity. Although these are regulated, it is not encouraged to locate new residential development within proximity to the brickworks and associated quarry. This is particularly where it would be near to an active working phase at some point during the quarry's lifetime (currently permitted to 2051 under planning consent references RR/76/1460(CM) and MR/10 (Review of Mineral Planning Permission)).

9.11. Figure 2 is one of several permitted working phase plans and demonstrates how close to the allocation boundary mineral extraction could occur.

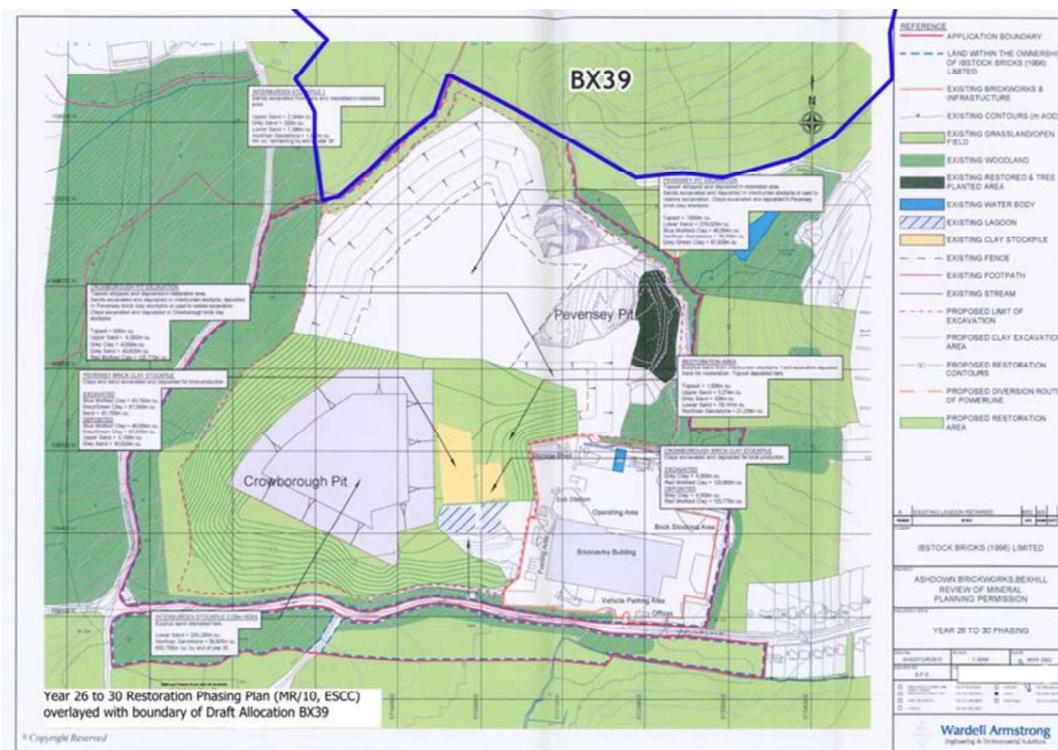


Figure 2: permitted working phases (for year 26 to 30)

9.12. There is no statutory buffer distance between an active quarry boundary and housing development in the UK. The MCA/WCA area shown on Figure 1 is 100m from the permitted operational quarry boundary.

9.13. Based on the existing boundary of BX39, it is considered that the winning and working of minerals (around the edge of the existing quarry) and within the MCA could be curtailed, and the allocation may also fail to provide adequate living conditions for the occupiers of the proposed dwellings within it. On this basis, it is unlikely that the MPA will support an allocation for housing and associated infrastructure as currently reflected by the concept masterplan details, which show housing being located within the 100m MCA/WCA.

9.14. It is recommended that the supporting text to this policy identifies the MCA and WCA and associated safeguarded minerals and waste development as a constraint on page 193 of the Local Plan document. It is advised that the allocation boundary should be amended to avoid being in such proximity to Ashdown Brickworks. This is alongside Policy BX29, which should be strengthened to include reference to maintaining the effective function of the safeguarded operations at Ashdown Brickworks. We also expect reference to consultation taking place with the MPA regarding development and masterplanning of the proposed

allocation under BX39. If a buffer is to be used by the allocation, then this must show accurately the 100m distance proposed, which reflects the same boundary as the MCA/WCA.

- 9.15. Overall, this allocation will need further consideration regarding compatibility with Ashdown Brickworks. Therefore, the MPA welcomes further dialogue surrounding the masterplan for the development coming forward in this area of the North Bexhill Growth Area. The current allocation and concept masterplan is not supported and will likely receive objection from the MPA should sensitive development (such as housing) be located within the MCA/WCA.

Comments on Draft Policy BX35: Land at Levetts Wood and Oaktree Farm, Bexhill.

- 9.16. The continued allocation for employment development at BX35 is supported. The site adjoins an Area of Search for potential waste development identified by the East Sussex, South Downs and Brighton & Hove Waste and Minerals Sites Plan (2017) (Figure 3). This is compatible with any potential future waste use that may come forward in this area.

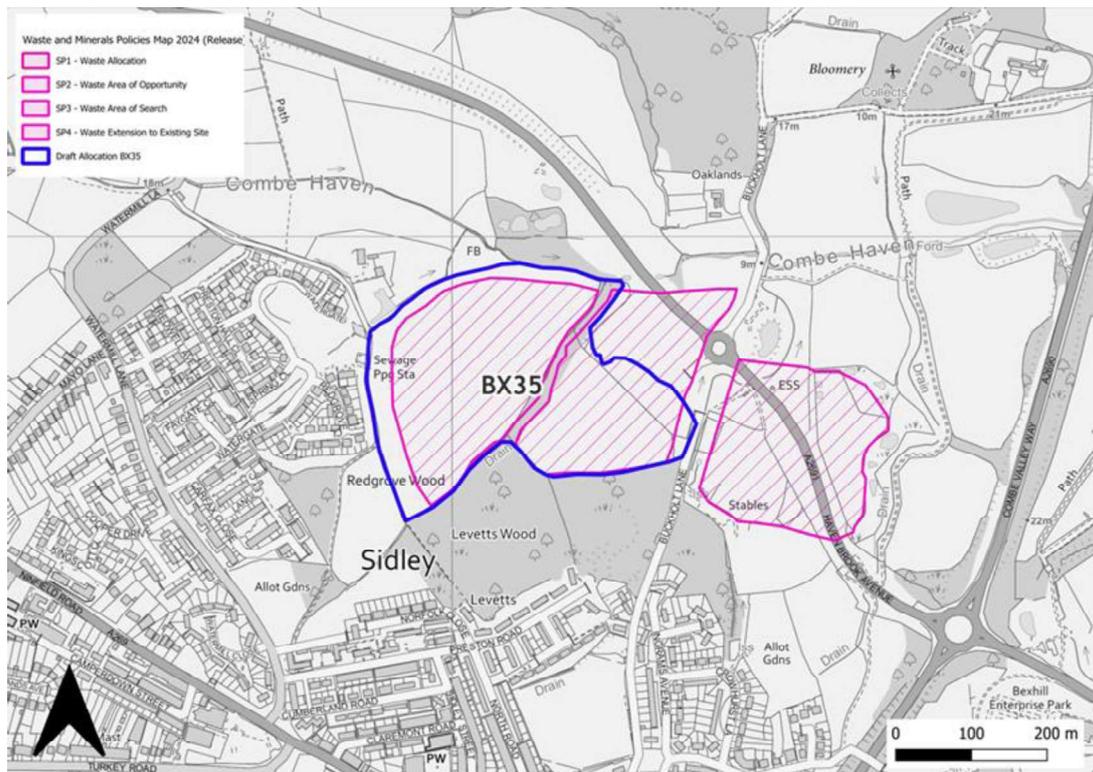


Figure 3. Area of Search ref. SP-S/C land north of Sidley, Bexhill

Comments on Draft Policy GU1: Land North of A265, Ivyhouse Lane, Hastings (Q28.):

- 9.17. The continued allocation for employment development at GU1 is supported. The site adjoins an 'Area of Search for potential waste development' identified by the East Sussex, South Downs and Brighton & Hove Waste and Minerals Sites Plan (2017) (Figure 4). This is compatible with any potential future waste use that may come forward in this area.

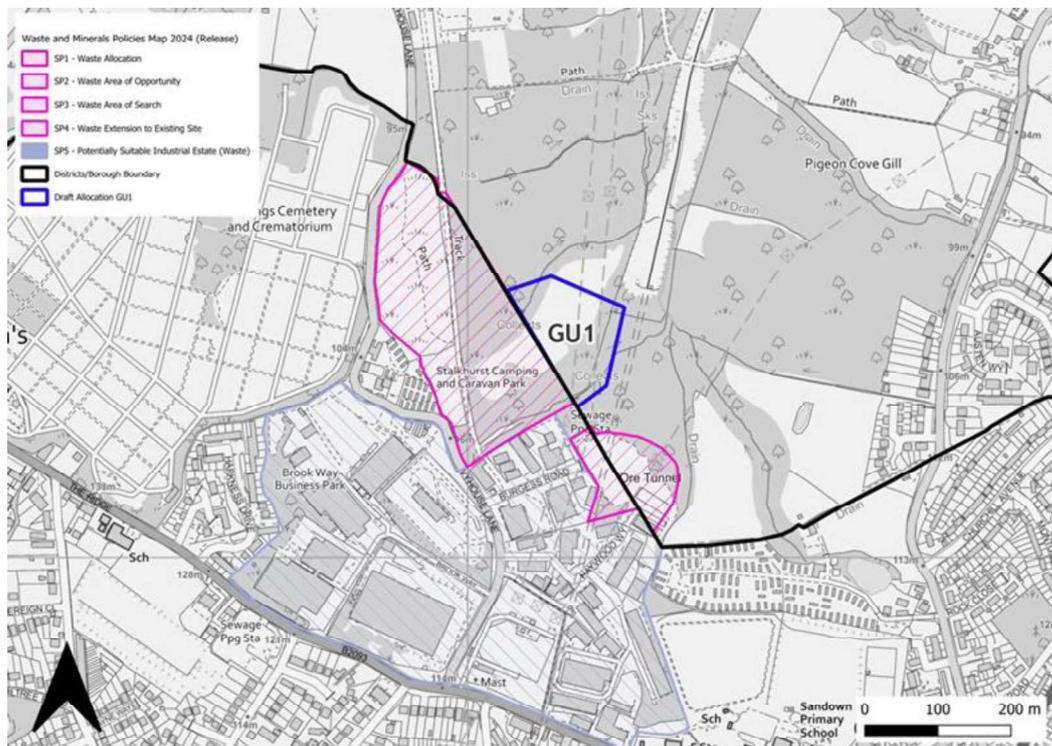


Figure 4: Area of Search, ref. SP-S/B, Ivyhouse Lane Extension, Hastings

Comments on proposed site allocations for Gypsies, Travellers and Travelling Showpeople: GYP4: Land adjacent to Fir Tree Cottage, Netherfield Hill, Battle and GYP6: Land adjacent to Valentine Ridge, A2100, Mountfield (Q64.)

- 9.18. The proposed allocations for gypsies, travellers and travelling showpeople at GYP4 and GYP6 are both located within an MCA. GYP4 lies within the Brightling Mine/Robertsbridge Works MCA as identified by the East Sussex, South Downs and Brighton & Hove Waste and Minerals Sites Plan (2017) (Figure 5). GYP6 lies completely within the Mineral Safeguarding Area (MSA) for the Brightling gypsum mine (Figure 6).
- 9.19. We note that GYP4 has temporary planning permission (ref. RR/2022/2791/P). However, GYP6 is a new site that has been submitted for consideration.
- 9.20. The Brightling Mine is safeguarded by Policy RM3 of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan: Revised Policies, 2024 for the mining of gypsum. GYP6 is within the Mineral Safeguarding Area (MSA) for the Brightling Mine. Proposals for non-minerals development on or near the MSA that would sterilise or prejudice the extraction of the mineral resource or result in incompatible development should not be permitted. This is unless it can be demonstrated with a Mineral Resource Assessment, that:
- a) the development is not incompatible with any permitted minerals operations; and
 - b) mineral extraction in advance of surface development (prior extraction) would not be practical or feasible.
- 9.21. The policy or supporting text for both GYP4 and GYP6 does not refer to them being located within an MCA and/or MSA for the gypsum mine. Policy RM7 of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan: Revised Policies, 2024 requires that planning applications for development such as this will require consultation with the Minerals Planning Authority. It is therefore advised that the text to this policy includes reference to the requirement to consult the MPA and the mine operator to determine whether the proposed development at this site would be incompatible.

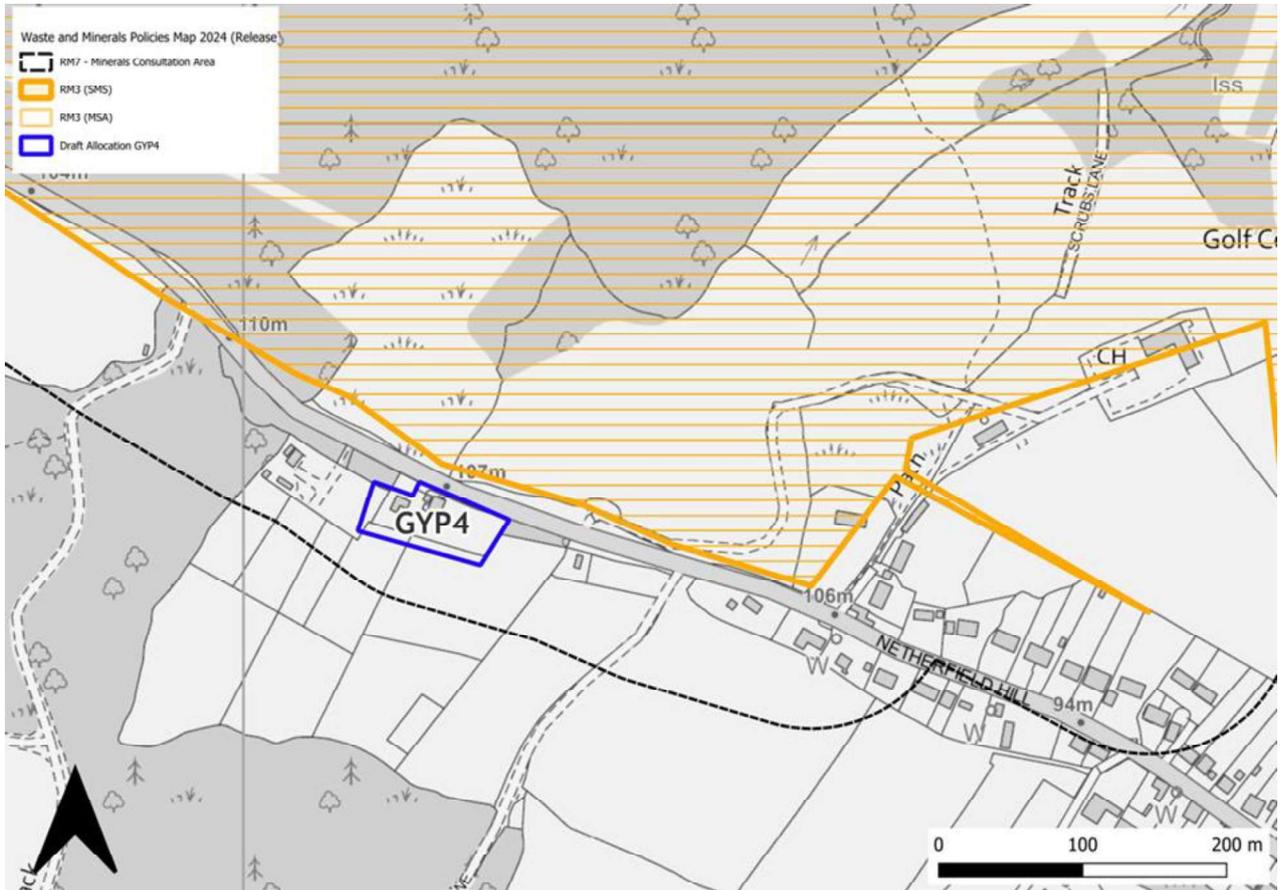


Figure 5. Land adjacent to Fir Tree Cottage, Netherfield Hill, Battle (GYP4) and the British Gypsum MCA ref. Map SP-MSA/C British Gypsum

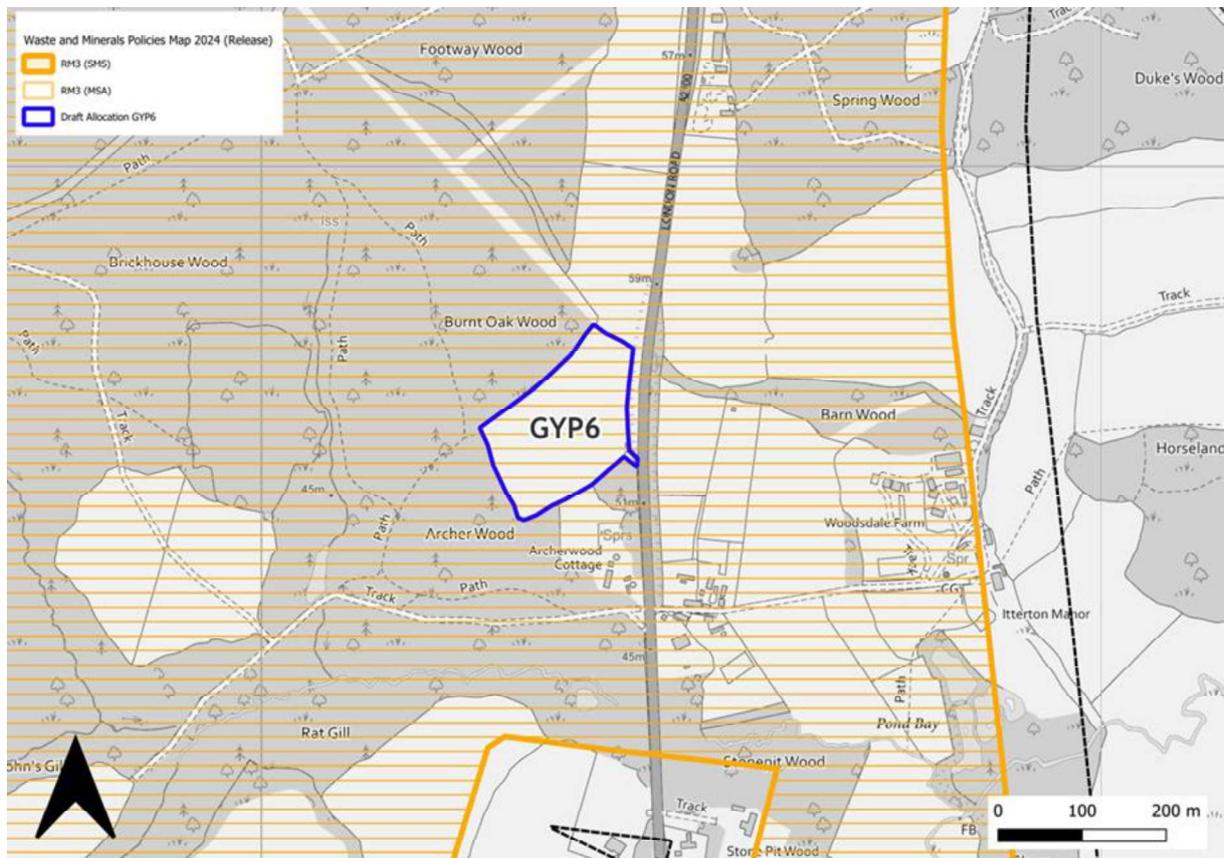


Figure 6. Land adjacent to Valentine Ridge, A2100, Mountfield (GYP6) and the British Gypsum MCA ref. Map SP-MSA/C British Gypsum

Comments on the proposed site allocation in Rye Harbour, detailed policy RH1 (Q50.)

- 9.22. Allocation RH1 (residential development for 40 dwellings) sits within the MCA and WCA for Rastrum's Wharf located in Rye Harbour (Figure 7) as identified by the East Sussex, South Downs and Brighton & Hove Waste and Minerals Sites Plan (ref. Map 74, SP-RSA/C). It is noted that it is an existing allocation under Policy RHA1.
- 9.23. Policy RM5 of the Revised Policies Document, 2024 safeguards minerals infrastructure and associated capacity, including wharves. Along with railheads, wharves are the key bulk transport routes in East Sussex. Using the 'Agent of Change' principle, the policy protects the safeguarded facilities from negative impacts resulting from non-minerals development which may not be compatible with the operation of minerals infrastructure sites. Policy WMP6 considers safeguarding waste sites. The area is also safeguarded for waste, due to continued use of the area for built waste facilities also.

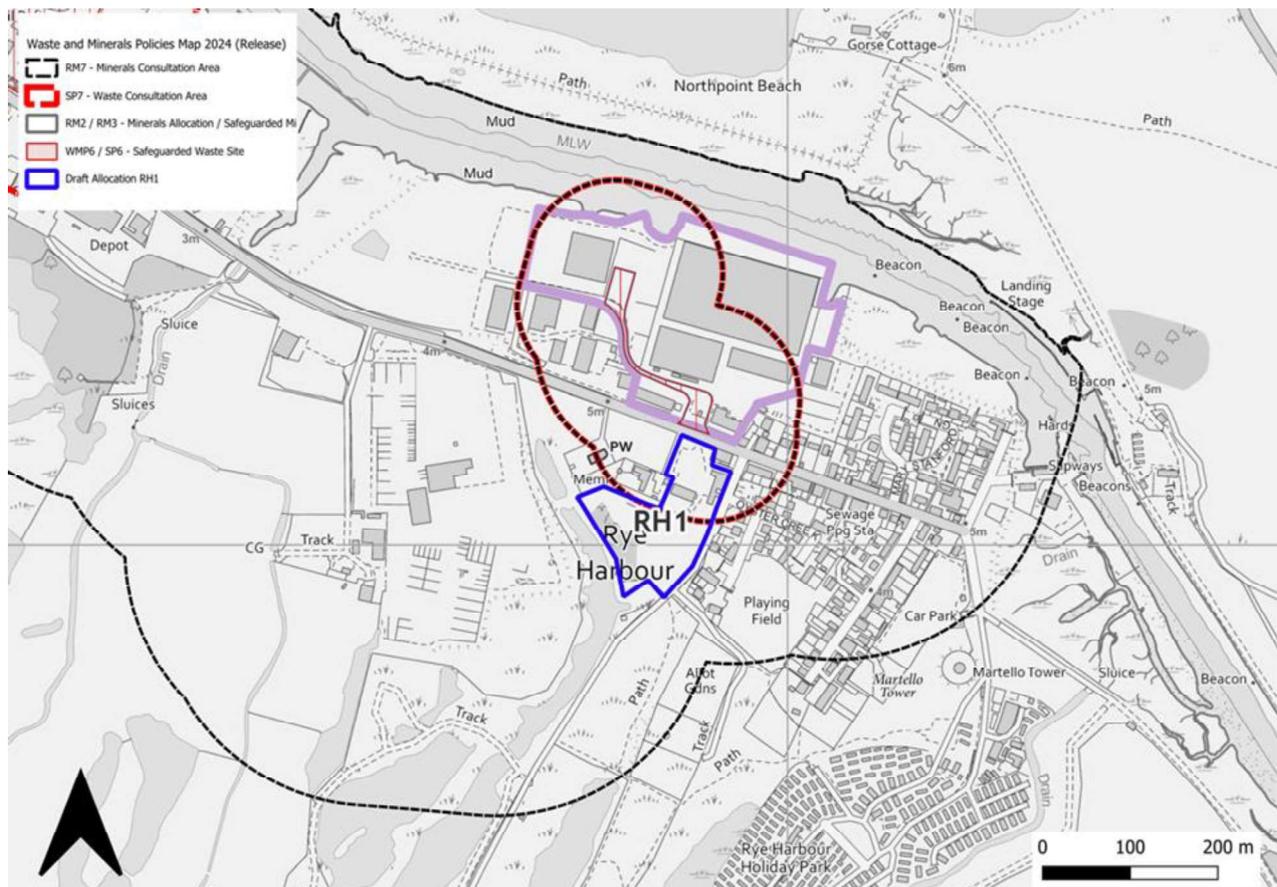


Figure 7. Land at Stoneworks Cottages, Rye Harbour and the MCA & WCA at Rastrum's Wharf, Rye Harbour (ref. Map 74, SP-RSA/C)

- 9.24 Rye Harbour is one of the wharves in the Waste and Minerals Plan Area and is of strategic importance for the landing, handling and storage of marine borne sand and gravel (aggregate). These minerals are critical to supply the construction industry and infrastructure development within East Sussex. It is critical because land-won reserves of aggregates in the County are now depleted. Due to its importance, the wharf is safeguarded and it is in relation to this that the MCA applies. For this reason, together with the location of operational built waste facilities, the area is safeguarded under Policies RM5 (safeguarding minerals infrastructure) and RM7 (minerals consultation areas) as well as Policies WMP6 and SP7 (waste consultation areas).
- 9.25 The nature of these operations is such that they can give rise to potential impacts associated with light, noise, dust and visual amenity. Although these are regulated, it is not encouraged to locate new residential development within proximity to these operations. The allocation is in proximity to active minerals and waste operations within the MCA/WCA. Development

of this type and scale (40 dwellings) is also not provided in the list of excluded development supporting safeguarding and consultation policies RM5, RM7 and SP7. For this reason, it is considered that the proposed allocation for 40 dwellings in this location will need careful consideration.

- 9.26 It is understood that the site is an existing allocation, but we would advise that the policy and/or supporting text in regard to that policy recognises and reflects the potential effects associated with locating residential development in proximity to an operational wharf. It is recommended that the text ensures that the MCA/WCA is noted and that consultation with the Minerals and waste Planning Authority must be carried out for all development schemes proposed there.

10. Ecology

General comments

- 10.1. Although Rother District Council (RDC) have been actively involved in the development of the Local Nature Recovery Strategy (LNRS) for East Sussex and Brighton & Hove, the Plan makes no reference to the LNRS. All local planning authorities have a duty to have regard to the LNRS under the Natural Environment and Rural Communities (NERC) Act 2006. Many of the proposed site allocations are within or adjacent to Areas of Particular Importance for Biodiversity (APIB) mapped in the LNRS, and many also lie within locations mapped as Areas that Could become of Importance for Biodiversity (ACIB). One of the site allocation policies (NR1) makes reference to the Biodiversity Opportunity Area (BOA) with respect to the identification of appropriate biodiversity enhancements. BOAs were taken into consideration in the development of the LNRS and as such, it is more appropriate to refer to the ACIB as well as listed priorities and measures within the LNRS rather than the BOAs.
- 10.2. It is noted that many of the site allocation policies refer to the 'Live Well Locally' priority, but not to the twin objective of 'Green to the Core' which should be given equal weight. This could be achieved if site allocations give due consideration to the LNRS and require any development proposals coming forward to be informed by Ecological Impact Assessments (EclAs) and Ecological Constraints and Opportunities Plans (ECOP).
- 10.3. Strategic Spatial Objectives (Q1.): The Strategic Spatial Objectives are broadly supported but could be amended to recognise the need to support biodiversity and nature recovery, helping to meet the Green to the Core objective. Examples follow.
- SSO2. Suggest amendment (underlined): *Maximise opportunities for nature conservation, recovery and biodiversity net gain and preserve the historic landscape character of the HWNL and protected habitat areas of Rother and ensure sensitive development that allows communities and wildlife to thrive.*
 - SSO7. Suggest amendment (underlined): *Focus growth in sustainable locations across the district, or places that can be made sustainable, through the timely delivery of strategic and other supporting infrastructure, including nature-based solutions, and community facilities.*
- 10.4. Infrastructure needs or priorities to support the proposed Development Strategy (Q5.): Landscape scale deer management is a key priority across East Sussex to reduce the impact of deer of woodland regeneration, recolonisation and quality of woodland (and other) habitats. However, successful implementation is dependent on sufficient infrastructure to develop a local venison market (abattoirs etc). Suitable infrastructure would help to deliver the LNRS, would support the objectives of the High Weald National Landscape and would support local economies.

- 10.5. The preferred approach for housing density (Q7.); The proposal to increase density in existing urban and suburban areas, in particular, is supported but it should be noted that this could result in a decrease of on-site biodiversity net gain (BNG) if not sensitively designed. This would be contrary to the biodiversity gain hierarchy, the LNRS and Lawton principles and could work against the 'Live Well Locally' and 'Green to the Core' objectives.
- 10.6. Proposed Overall Development Strategy (Q8.); This is generally supported.
- 10.7. Proposed Vision and redevelopment strategy for Bexhill (Q10.); Opportunities set out in para 6.32 align with the draft LNRS and are therefore supported. Any ecological enhancements to Combe Valley Countryside Park should have regard to LNRS priorities and measures. Proposals to improve access should be sensitively designed to avoid impacts to biodiversity, including disturbance and other recreational impacts. Using the site for both recreation and BNG may not be compatible.
- 10.8. Proposed Vision and development strategy for Southern Rother and the Hastings Fringes (Q11.); Acknowledgement that some of the proposed sites for allocation require more detailed consideration of impacts, including cumulative impacts is welcomed. Also support the justification for no sites proposed for allocation in Pett Parish or other Hastings Fringes settlement areas.
- 10.9. Proposed Vision and development strategy for Battle and surrounding settlements (Q12.); Acknowledgement that some of the proposed sites for allocation require more detailed consideration of impacts, including cumulative impacts is welcomed.
- 10.10. Proposed Vision and development strategy for Rye and the Eastern Settlements Cluster (Q13.); Acknowledgement that some of the proposed sites for allocation require more detailed consideration of impacts, including cumulative impacts is welcomed. It should be noted that opportunities for BNG within designated sites will be limited and as such, this should not be relied upon as a mechanism for delivery.
- 10.11. Proposed Vision and development strategy for Northern Rother (Q14.); Acknowledgement that some of the proposed sites for allocation require more detailed consideration of impacts, including cumulative impacts is welcomed.
- 10.12. Proposed Vision and development strategy for Northern Rother (Q15.); The vision should recognise that the need to maintain and enhance biodiversity as well as landscape character and farming capacity.

Site Allocations

- 10.13. For all proposed allocated sites, and particularly those in suburban and rural areas, scheme design should be informed by Ecological Impact Assessments (EclA) and Ecological Constraints and Opportunities Plans (ECOPs) to ensure that appropriate mitigation for priority habitats and protected species is provided, and that biodiversity is built into the scheme rather than bolted on. This will help to embed the mitigation hierarchy in all schemes, as required by the NPPF. It is noted that some allocation policies refer to the need for ecological surveys, but not all, and there seems to be no consistency.
- 10.14. Development, and most notably proposals for connectivity and biodiversity enhancements, should have regard to the LNRS.
- 10.15. Cumulative and in combination impacts on biodiversity should be taken into account.
- 10.16. Many of the proposed site allocations overlap, are adjacent to or in close proximity to ancient woodland. Many of the proposed policy requirements for these allocations note the presence of ancient woodland, but not all. Where noted, the policy requirements include the need for a minimum 15m semi-natural buffer to the ancient woodland; this is in line with

Natural England's standing advice, but it should be noted that in some cases, more significant buffers may be required, especially for major residential developments which are likely to increase pressures on ancient woodland (recreational, garden escapes etc) and on protected species using them (e.g. increased predation by domestic pets). The majority of policy requirements also note that ancient woodland buffers should exclude residential gardens. This is supported but it should also be made clear that these buffers should also exclude other infrastructure including, but not limited to, footpaths/cyclepaths, play areas, SuDS etc.

- 10.17. A number of site policies refer to a requirement to provide BNG on-site. Whilst this is supported and is in line with the biodiversity gain hierarchy, it should be recognised that not all green space can be used to deliver BNG, e.g. if buffers to ancient woodland or retained habitat for protected species are required as mitigation, this could help bring the development to no net loss, but may not be able to be included as BNG. Also, multiple requirements for open space, e.g. play areas, public access etc, may not be compatible with delivering meaningful BNG.
- 10.18. Several allocations note the need for policies around sensitive lighting and dark skies. These policies should also make reference to [Guidance Note GN08/23](#).
- 10.19. BX1 Bexhill Urban Area; The requirement for biodiversity enhancements, including through the use of an Urban Greening Factor (UGF) is welcomed. Details of the UGF policy should be provided. This may prove particularly useful in urban areas where the de minimis BNG exemption may apply, to ensure that biodiversity is retained within urban areas, helping to address the twin objectives of Living Well Locally and Green to the Core, as well as helping to deliver LNRS priorities. We would advocate the requirement for biodiverse green and/or brown roofs and green walls wherever possible, as well as the use of native and/or nature friendly planting within landscaping.
- Enhancements to the public realm should have regard to the LNRS, particular with regards to priorities and measures for woodland, hedgerows and scrub, urban nature, urban treescapes and aquifers.
- 10.20. BX16 Land west of Pages Lane; Policy requirements broadly supported but it is recommended that vegetation along the southern boundary is retained and enhanced to maintain a green corridor along the road.
- 10.21. BX18 West Bexhill Growth Area; It is especially important that this growth area considers the Green to the Core objective as well as Live Well Locally. Allocations in this area are in close proximity to APIB (Pevensy Levels SSSI, SAC, Ramsar and ancient woodland). Large portions included in ACIB with measures mapped for rivers, streams and aquifers, woodland, wetlands and standing waterbodies, urban nature and nature networks. Public open spaces should be positioned carefully to ensure no recreational impacts on APIB features.
- 10.22. BX20 Land off Spindlewood Drive; The green corridor is considered essential for maintaining connectivity for habitats and species, and this should be prioritised over public access and recreational use.
- 10.23. BX23 Land north of Rosewood Park; Strong buffers along the southern boundary and to the ancient woodland should be required.
- 10.24. North Bexhill Growth Area; BX29 North Bexhill Growth Area and BX30 Land south of Haven Brook Avenue; Especially important that this growth area considers the Green to the Core objective as well as Live Well Locally. There are APIB within this area, comprising multiple blocks of ancient woodland. Allocations BX45-49 are close to Combe Haven SSSI, ancient woodland and LWS. Large portions included in ACIB with measures mapped for woodland,

rivers, streams and aquifers and urban nature and nature networks. Public open spaces should be positioned carefully to ensure no recreational impacts on APIB features. A master-planning approach is welcomed.

- 10.25. GU1 Land north of A265, Ivyhouse Lane: The site is in close proximity to APIB (ancient woodland) and is surrounded by deciduous woodland habitat of principal importance (HPI). Substantial buffers should be provided to all woodland boundaries, with particular consideration given to reducing the impacts of predation by domestic pets.
- 10.26. GU3 Rock Lane Urban Fringe Management Area: This policy is strongly supported and aligns with the draft LNRS, with APIB (ancient woodland) and mapped measures for woodland, rivers, streams and aquifers, and nature networks on the ACIB.
- 10.27. IK2 Land adjacent to Orchard Close, Icklesham: The ACIB includes mapped measures for woodland, hedgerow and scrub within/adjacent to the site, recognising the presence of traditional orchard priority habitat on site.
- 10.28. WS2 Land east of Beany's Lane, Hastings: The policy to restrict development to the southern third of the site is supported.
- 10.29. BT2 Land at Breadsell, Battle: Virtually the whole site is mapped on the ACIB for woodland, hedgerows and scrub and nature networks. Delivery of these measures should be prioritised within any scheme development. The programme of monitoring for SSSI is welcomed.
- 10.30. SD2 Land at Church Hill Farm, North of Village Hall, Sedlescombe: The ACIB maps measures for enhancement of existing species-rich grassland adjacent to the site with potential for creation of species-rich grassland within the site. This should be taken into consideration in scheme design.
- 10.31. Camber: All these allocations, but most notably CM1 and CM2, are likely to put increased pressure on the sand dunes - an irreplaceable habitat as per BNG regulations - at Camber Sands (SSSI) and on adjacent SSSI, SPA, Ramsar in terms of increased recreational pressure, coastal squeeze, enrichment etc.
- 10.32. Rye: RY2 to RY9 will need to undertake a Habitats Regulations Assessment with respect to Dungeness, Romney Marsh and Rye Bay SPA/Ramsar and potentially Dungeness SAC.
- 10.33. HG1 Land south of Iridge Place, London Road, Hurst Green: There is an ancient and/or veteran tree mapped in the south-east corner of this allocation. Ancient and veteran trees are irreplaceable habitats. Appropriate semi-natural buffers must be put in place.
- 10.34. TC3 Bewl Water: This policy is strongly supported.
- 10.35. SG2 Land east of Bardown Road, Stonegate: The ACIB maps sandstone outcrops within/close to this allocation. Protection of such features should be a requirement.

Yours sincerely,

[Redacted Signature]

[Redacted Name]

Head of Planning and Environment

[Redacted Contact Information]