

Date: 18 March 2026
Our ref: 539523 & 541089



Planning Policy Team
Rother District Council

Customer Services
Hornbeam House
Crewe Business Park
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BY EMAIL ONLY

Dear Planning Policy Team,

Planning consultation: Draft Rother Local Plan 2025–2042 – Development Strategy and Site Allocations and Interim Sustainability Appraisal and Infrastructure Delivery Plan.

Thank you for your consultations on the above dated 26th January and 11th February 2026, which were received by Natural England on the same days.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We note that we previously provided comments on your Draft Rother Local consultation (our reference 359662) where we focused on the use of Natural England's 'Green Infrastructure Framework - Principles and Standards for England' (GIF) and briefly touched on other matters previously discussed with your authority. These comments remain valid (I have attached a copy for convenience) and the comments below, in relation to your latest consultations, will have a similar focus. The absence of comments on other matters within the Plan should not be taken as Natural England having no comments to make but that we have prioritised our advice. In particular, we have not commented on SA or HRA concerns (other than in relation to the Dungeness Complex, below), or any protected landscape concerns nor reviewed the allocations.

Draft Rother Local Plan 2025–2042 – Development Strategy and Site Allocations

Key sustainability issues

Plan- Making for Biodiversity in the Climate Emergency

Given the severity of the decline in biodiversity and the climate change emergency, local plans have a key role to play in planning for resilience, forecasting, and making space for nature to adapt to a changing climate. Plans should seize the opportunity to help to reverse this decline through ambitious and integrated plan-making which demonstrably avoids and minimises impacts and seeks all opportunities to help reverse the biodiversity decline.

Green Infrastructure

Plans must adopt a strategic approach through multifunctional green infrastructure provision and nature recovery networks. To this end, we welcome the incorporation of green and blue infrastructure provision within several of your site policies. In particular, we welcome the embedding of Natural England's GIF within Policy BX1 – Bexhill Urban Area. However, we recommend the strengthening of the wording, by clarifying the meaning of 'Where appropriate...' in the context of this policy and by *requiring* the use of the Urban Greening Factor (and incorporation of '...measures

to support...and biodiversity enhancements’). To this end, we suggest the use of ‘must’ rather than ‘should’, in paragraph four of the policy text. We recognise the existing urban nature of this policy’s geographical area but this increases the likely need to provide green infrastructure within new developments (NPPF 20 d), 96 c) and 125 a).).

We also welcome the requirement within Site Policy BX8, that development ‘on this site must:... iv. Provide a Green Infrastructure framework that retains and enhances habitats, alongside sustainable drainage (SuDS) measures;...’

Additional Comments:

Local Nature Recovery Strategy (LNRS)

Spatial Strategic Objective (Figure 1) – We welcome the inclusion of an objective to ‘2. Maximise opportunities for nature conservation, recovery...’ However, although some of your previously proposed policies include the requirement to meet the objectives of the LNRS (non-strategic policy ENV5: Habitats and Species and strategic policies GTC7: Local Nature Recovery Areas, GTC8: Biodiversity Net Gain), there is currently no reference to the emerging LNRS. This section of the Spatial Strategic Objective would be a suitable place to support those policies and the NPPF (192 a)) by the addition a similar requirement, in relation to complying with the LNRS.

Designated Sites

Figure 11: Rother Development Strategy – Key Diagram – a pictorial representation of the development strategy

For completeness, this figure should include the Beachy Head East (Royal Sovereign Shoals) Marine Conservation Zone. Although the intended environmental interest coverage is not specified, it should be noted that Sites of Special Scientific Interest and Local Nature Reserves are also missing, so if these have been deliberately omitted, perhaps the addition of some text explaining the choice of environmental sites should be included by way of clarification.

Habitats Regulations Assessment Background Paper – Draft (Regulation 18) Version – January 2026

Further to our previous advice in relation to addressing recreational pressure on the Dungeness Complex, we would take this opportunity to repeat advice given on 19th January 2026, regarding the need to update the visitor surveys and to devise an appropriate mitigation strategy:

Natural England are concerned about delays in the production of a suitable mitigation plan; especially in view of the age of the original visitor surveys. The detailed mitigation within the SARMS would need an updated evidence base. However, if such surveys indicate that recreational use is predominantly from visitors from outside of the local authority area, it may be that mitigation would more appropriately be addressed through a ‘Coastal Code of Conduct’ type approach, rather than via developer contributions. The details of such an approach would need to be discussed with our protected sites colleagues.

Infrastructure Delivery Plan

We welcome the recognition of green infrastructure as a type of infrastructure (2.23) and for your authority’s commitment to “Integrate community centres into wider green infrastructure...” (4.22 c.). We also welcome your authority’s aim, as set out in the Council’s strategic objectives and in the Rother Climate Strategy 2030, to place strong emphasis on enhancing the quality, accessibility, and multifunctionality of the green infrastructure network. (7.12).

We would be happy to provide further advice on future documents, via our consultations hub at:

If you have any queries relating to the advice in this letter, please contact me on [REDACTED] or at [REDACTED]

[REDACTED] BSc.(Hons), MSc.

**Sustainable Development Higher Officer
Sussex & Kent Team
Natural England**

I work flexible part time hours with my usual working days being Mondays, Tuesdays and Wednesdays.

Phone: [REDACTED]

Pronoun: She/Her - [why have I put this?](#)