

By email: draftlocalplan@rother.gov.uk

Our ref: PL00711842

Planning Policy Team
Rother District Council
Town Hall
Bexhill-on-Sea
TN39 3JX

[REDACTED]
Date: 20 March 2025

Dear Policy Team,

Re: Draft Rother Local Plan Regulation 18 (2025)

Thank you for consulting Historic England on the proposed Regulation 18 Local Plan consultation. As the Government's statutory adviser, Historic England is keen to ensure that conservation and enhancement of the historic environment is fully taken into account at all stages and levels of the planning process. Our comments relate primarily to the requirements in the National Planning Policy Framework (2025) for local plans to contain policies to conserve and enhance the historic environment (para 20), to set out a positive strategy for its conservation and enjoyment (para 203) and that they should be underpinned by relevant and up-to-date evidence (paras 32 and 205).

We have previously provided comments in July 2024 on an earlier consultation addressing general local plan policies. We will not re-iterate those points here. We have structured our comments in line with the questions posed within the consultation where possible but have also included some more general and specific comments at the end.

7. Do you have any comments on the preferred approach for housing density shown in Figure 9, or on the updated Density Study (2026)?

The draft plan proposes an increase in densities for 'Urban Areas' in Bexhill, Battle, and Rye, moving from the previously consulted range of 60–90+ dph to a more ambitious 110–125 dph. While this uplift may be appropriate for certain contexts in Bexhill, although the Council's evidence base should justify this, it is less clear how these higher figures would be practically delivered within Rye and Battle without potentially affecting their historic character. A point that

is underlined by the Council's own assessment of the potentially negative impacts of proposed policy approach on the historic environment in the Sustainability Appraisal. Unlike the approach taken for Bexhill, the current draft does not yet specify the precise locations where these higher density ranges would apply within the 'Urban Areas' of Rye or Battle. Given the high concentration of designated heritage assets in the historic cores of these towns, further clarity is needed to ensure that such densities can be reconciled with statutory duties and national policy regarding the preservation of the historic environment.

It is also worth noting that opportunities for high-density redevelopment within these historic cores appear relatively limited. It is therefore unclear what impact the proposed policy would have. Current site allocations suggest that development more frequently occurs on the fringes rather than within the historic core. The Council's own allocations in Battle and Rye currently range from 35–65 dph; for example, Site BT11, though categorized as 'Urban,' is currently set at 65 dph, half the proposed density within this policy. The Former Lower School Site in Rye represents a notable exception, though its higher density is a function of its specific use as flatted accommodation for older persons, which may not be a representative model for general housing across the wider area.

Consequently, the Density Study (2026) would benefit from further demonstration of how 110–125 dph can be successfully integrated into the historic character of Battle and Rye to help justify the Council's approach. The Rother case studies in Section 9 do not appear to show local examples exceeding 55 dph, and the contemporary best practice examples in Appendix 2 that exceed 100 dph are drawn from much larger urban centres like Newcastle and London.

For the reasons stated above, we raise concerns with the approach taken to housing density within Battle and Rye in particular.

Q8. Do you have any comments on the Council's proposed Overall Development Strategy?

Our focus for the Council's overall development strategy is to ensure that where growth is proposed within or near historically sensitive towns, villages or assets that the Council has put in place appropriate policies to preserve the historic environment and that any opportunities to enhance heritage assets through development have been taken.

We are pleased to see the Council has integrated heritage considerations within the draft site allocations. Heritage assets that may be impacted by development sites have been identified with the allocations and suitable policy caveats have been included. Please see comments on specific site allocations below.

Q10. Do you have any comments on the proposed Vision and development strategy for Bexhill, including the development figures shown in Figures 13 and 14?

The vision is silent on the role and importance of the cultural offer centred on the Grade 1 listed De La Warr Pavillion, which is reflected in Policy BX2 but could also be incorporated into the vision for the town also.

Q12. Do you have any comments on the proposed Vision and development strategy for Battle and Surrounding Settlements, including the development figures shown in Figures 20 and 21?

We welcome the Local Plan's vision for Battle, particularly its commitment to preserving the town's historical character. The Council's evidence base, including the [Town Centre Study](#), highlights Battle's strengths, notably its status as home to one of the nation's most significant historic sites and its connectivity via the train station. These align with the Neighbourhood Plan's objective to enhance tourism within the parish. We believe there is an opportunity for the vision to build on these strengths. By adopting a more proactive framework to promote and protect Battle's cultural heritage, the Vision can help to support the local economy while celebrating the town's historic identity.

Q19. Do you have any comments on proposed Policy BX1: Bexhill Urban Area?

We support the inclusion of policy criteria that address heritage considerations. Increased development density within Bexhill Town Centre should avoid or minimise harm to the historic environment. We suggest the following wording is amended to better align with national policy:

"Proposals that intensify existing development to increase densities will generally be supported, provided they demonstrate high-quality design, **the significance of have a satisfactory relationship with** any heritage assets (whether designated or non-designated) is **preserved or enhanced** and **do not compromise** residential amenity **is not compromised**."

The policy also appears to suggest that the HER1 only applies within the Bexhill Town Centre Conservation Area rather than in any case where heritage assets might be affected. There are a number of listed buildings within the Bexhill Urban Area and an adjacent conservation area. We suggest the wording is amended to make this clearer.

Q20. Do you have any comments on proposed Policy BX2: Bexhill Cultural Area?

We support this policy, the emphasis on reinstating historic features and the recognition of heritage assets such as the De La Warr to the cultural offer in Bexhill.

Q21. Do you have any comments on proposed Policy BX3: London Road – Sackville Road Enhancement Area?

We support this policy. Sackville Road is a located within the Bexhill Town Centre Conservation Area and also forms part of the setting of the Grade 1 Listed De La Warr Pavillion. As such, we would welcome integration of heritage considerations into any future improvement scheme, such as:

v. Improvements preserve or enhance the character and appearance of Bexhill Town Centre Conservation Area and the setting of the Grade 1 De La Warr Pavillion.

Q22. Do you have any comments on proposed Policy BX4: Beeching Road Enhancement Area?

We support this policy. The supporting text outlines the opportunity to enhance the setting of the Grade II listed Bexhill West Station and its role as a gateway to the wider enhancement area. This could be given greater weight by being included in the policy text. This could be done, for example, by including text such as:

Vi Take opportunities to enhance the significance of the Grade II listed Bexhill West Station.

Site specific comments

Site Allocations BX22, BX27: Could be amended to preserve or enhance the significance of the listed building with the site rather than simply referring to the setting.

Site Allocation PL2: We note that this development is located within the setting of the Highly Grade 1 St. Michael's Church. The allocation is for 14 homes, which is significantly denser than the surrounding context. We welcome the policy criteria seeking to protect the setting of the Church and the enhancement of trees and hedgerows on the site. We would suggest the site's quantum of development is reviewed and the policy criteria strengthened where possible to ensure that the allocation will not cause harm to the significance of the Church.

Site Allocation BT7: This site is located close to the Registered Battlefield boundary. Reference should be made to preserving the setting of the Battlefield within the policy text itself. The requirement for an HIA is supported and could be included in the policy to provide additional weight. The HIA should assess the contribution which this allocation makes to the setting of the Registered Battlefield and what impact the loss of this open area and its subsequent development might have upon its significance.

Evidence Base

Local List: Since the 2024 Local Plan consultation, the Government has published a [revised NPPF for consultation](#). While we acknowledge the Council's intention to proceed under the current system and the December 2024 NPPF, the Government has signalled that future plans under the new system should be supported by a local list (see Policy HE1(d)).

Should this policy be confirmed, we encourage the Council to proactively strengthen and expand Rother's local list. This work can build on the successful identification of non-designated heritage assets already achieved in conservation area appraisals and neighbourhood plans (such as Battle or Salehurst and Robertsbridge). The Council can draw



on evident community support for such a list in parts of the District, as demonstrated for example in the aspirations in the Rye Neighbourhood Plan.

This positive approach to the identification of non-designated heritage assets will allow for the proactive recognition, retention and enhancement of these heritage assets in site allocations as demonstrated at Hodson's Mill (ref: Policy RB6a) and would present an integral element of the Council's positive strategy for the conservation and enjoyment of the historic environment. Historic England provide advice on local lists and have recently consulted on an update to our [Local Listing Advice](#). We expect to publish the final document shortly.

We hope these comments are helpful. I would be happy to discuss any aspect of this response if needed, and please feel free to contact me should you require any further detail on the points above. Finally, we wish to emphasise that this advice is based solely on the information provided to us. For the avoidance of doubt, this does not limit our ability to offer further guidance or to raise an objection to specific proposals where Historic England considers it appropriate.

Yours sincerely,

James Preece

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