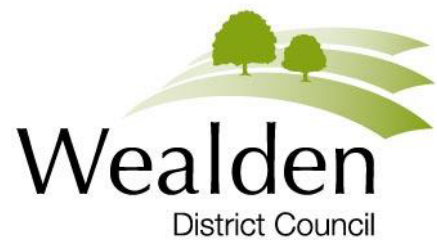


OUR REF: NW/dp

ASK FOR:

DATE: 23 March 2026

YOUR REF:



Planning Policy Team
Rother District Council

Head of Planning Policy, Economy &
Climate Change

By email

Dear Planning Policy Team

**Rother Local Plan 2025-2042 – Development Strategy and Site Allocations:
Regulation 18 Consultation (March 2026)**

Wealden District Council (WDC) welcomes the opportunity to formally comment on Rother District Council's (RDC) draft Local Plan (Regulation 18) consultation document that has been published for consultation until 23 March 2026. It is noted that the draft Local Plan primarily focuses on establishing a new Spatial Strategy for development in the Rother District Plan Area (incorporating site allocations) to replace the existing statutory development plan that includes the Rother District Core Strategy (2014)¹ and the Development and Site Allocations Local Plan (2019)². Following the review of the draft Rother Local Plan (Regulation 18) consultation document, we have focused our response on specific strategic cross boundary issues which impact our two local planning authority areas.

Housing Need

We note that the Government's 'standard method' for assessing housing needs (under paragraph 62 of the National Planning Policy Framework (NPPF)) provides an annual housing need figure of 912 (net) dwellings per annum (dpa) for Rother District, equating to 15,504 net dwellings for the proposed plan period between 2025 and 2042. The Draft Rother Local Plan seeks to deliver a total of 8,427 net dwellings during this period, which is 54% of the 'standard method' housing needs figure. This results in an unmet housing need of 7,077 (net) dwellings overall. We note that RDC has increased its projected housing land supply since the previous Regulation 18 Draft Rother Local Plan (April 2024)³ where a capacity-led figure of 7,287 net dwellings was identified.

It is noted at paragraphs 3.19 to 3.21 of the Draft Rother Local Plan (January 2026) that despite the Council reassessing and considering new sites within its Housing and Employment Land

¹ [Rother Local Plan – Core Strategy \(September 2014\)](#)

² [Rother District Council - Development and Site Allocations Local Plan \(December 2019\)](#)

³ [Rother Local Plan 2020 -2040, Draft \(Regulation 18\) Version, April 2024](#)



Availability Assessment (HELAA), RDC consider that the overall constraints mean that there is insufficient capacity to meet the housing needs figure identified by the 'standard method' and that the district is not suitable for unrestricted development owing to the High Weald National Landscape that covers much of the district and protected habitat sites.

The preferred development strategy details that further to comments received at the last Regulation 18 consultation stage (April 2024), RDC has looked at further opportunities for development along the A21 corridor, which includes bringing forward some larger sites in sustainable locations alongside sustainable travel benefits. It also states that opportunities for development within strategic gaps have been explored but dismissed through the Sustainability Appraisal (SA) process as it would undermine the principal intent of strategic gaps and maintaining distinctiveness between settlements. However, this infers that 'strategic gaps' identified in 2019 as part of the adopted Development and Site Allocations Local Plan (2019) are in principle considered suitable as part of any new spatial development strategy moving forward. Indeed, at paragraph 4.24 of the Interim Sustainability Appraisal (January 2026) accompanying the draft Plan, it states that 'it was suggested through the first Regulation 18 public consultation that opportunities should be explored to develop within the district's strategic gaps (albeit there was consideration for new development in the countryside and at the edges of existing settlements)'. This option has been considered in the SA. However, there does not appear to be any SA option considering the principle of designating those strategic gaps in the district and whether their removal would support development of new sites within the district and assist in meeting housing needs. This could be considered as an 'reasonable alternative' within the SA process.

Whilst there is reference to considering higher densities for residential development and considering amendments to development boundaries through site allocations within or on the edge of existing development boundaries, it is not clear in what detail further development potential in the west and north Bexhill areas have been explored as a strategic option and through the SA process. As this was presented as a preferred strategic option at the last stage of the Local Plan (April 2024), alongside other options such as Hastings Fringes urban growth, radial settlement networks connected to Bexhill and Hastings and, village clusters centres around Rye and Battle, WDC consider that justification should be given to how these options have been further explored in the SA process to increase housing land supply in the district. This is even more important as these principle options remain in the proposed overall development strategy for Rother District, in the bullet pointed list.

Focusing on the first area of growth (*West and North Bexhill to consolidate Bexhill as the most sustainable town, within the capacities of the existing transport network*), the previous Rother Local Plan (April 2024) identified a maximum supply of 3,398 net dwellings, which has increased to 4,764 net dwellings in the current development strategy. WDC support the vision for Bexhill, but as the town is the most sustainable location within Rother District (albeit that other settlements are also sustainable, notably Battle and Rye), we would comment whether the maximum opportunities have been identified and assessed. The West Bexhill Growth Area is supported by an infrastructure policy (named Policy BX18 – West Bexhill Growth Area – Infrastructure Policy), highlighting that a master-planning approach will be taken to the overall development of the area, and notes that a number of transport interventions are required. The introductory text to the policy states that:

'Impacts of development in this area on the A259 Barnhorn Road and the Pevensey Levels in particular will need to be carefully considered and further work is being undertaken on this by the Council both during and after this Regulation 18 consultation. Previous analysis indicates that a new western road bypass of Bexhill is unlikely to be financially viable, but this will be explored again with partners in light of the potential housing growth set out in this document.'

It may be considered that RDC is open to considering additional development potential within the West and North Bexhill area, which is supported by the identification and assessment of several additional sites within the Council's HELAA. However, the Council's supporting SA is not

sufficiently clear in terms of the maximum quantum of development that has been proposed or assessed through this strategic option, in order to evidence that it has considered the maximum supply that could be achievable through the delivery of a new sustainable transport corridor. There is also insufficient evidence as part of the supporting documentation to the Local Plan on this issue, particularly whether any additional work has been undertaken to further test the deliverability of a new sustainable transport corridor since the last Regulation 18 consultation in April 2024. In addition, it is unclear whether a significant quantum of development has been discounted because of any Habitats Regulations Assessment (HRA) impacts related to the Pevensey Levels Special Conservation Area (SAC) and Ramsar Site. This clarity is required before RDC progresses to its Regulation 19 version of the Local Plan.

WDC welcomes continued joint working on assessing the impacts of significant growth within the West and North Bexhill area, as any long-term solution could involve development of a new transport corridor on land within both Rother and Wealden District and could provide strategic transport interventions that would enhance development opportunities in our respective planning areas. This could also help reduce the level of unmet housing need within Rother.

As you are aware, WDC is currently consulting on its 'focused' draft Wealden Local Plan (Regulation 18) (February 2026)⁴. Our latest 'focused' draft Wealden Local Plan intends to provide an overall housing supply figure for Wealden of 16,609 (net) dwellings over the prospective Plan period (2025-2042), which equates to an annual target of 977 dpa. The Council's housing need calculation, as set out under the 'standard method' of the NPPF equates to 1,457 dpa, or over a 17-year plan period from 1 April 2025 to 31 March 2042, equates to a need to deliver 24,769 (net) dwellings.

The amended 'standard methodology' in the NPPF (December 2024) has increased Wealden District's Local Housing Need (LHN) figure from 1,200 dpa to 1,457 dpa between Wealden's respective draft Regulation 18 Local Plans that were published in March 2024 and February 2026. For WDC, at this stage in the plan-making process, there is a shortfall in housing delivery of at least 8,160 (net) dwellings over the Plan period, which amounts to a shortfall of 480 (net) dpa. This represents a significantly greater shortfall than identified in draft Wealden Local Plan (March 2024)⁵ of 4,071 (net) dwellings. This has been largely driven by the amended 'standard method' introduced through the current NPPF (December 2024).

In line with RDC's approach, WDC will be undertaking further technical assessment and testing for sites as part of the plan-making process (particularly in relation to transport modelling, the HRA, the SA, further landscape assessments and the Strategic Flood Risk Assessment (SFRA)) as the Local Plan progresses. This work is essential in determining the extent to which additional housing can be accommodated within the district, taking full account of environmental constraints, infrastructure capacity, and the cumulative implications of growth.

In addition, as part of the 'Focused' Wealden Local Plan, we have also identified several additional option sites in the review and which once further assessment work has been undertaken, they may represent additional opportunities for housing growth. This additional work includes further detailed assessment, submission of additional information, and/or technical matters being overcome. These 'potential' sites may deliver an additional 4,854 (net) dwellings over the Plan period, albeit that the sites may not be suitable for allocation or development at any stage, pending further site investigation, updated evidence, and information sought.

We remain committed to constructive and ongoing collaboration with RDC on this strategic matter. We look forward to progressing a Statement of Common Ground (SoCG), which will set out, among other matters, the level and distribution of identified needs across both authorities once the emerging evidence base for each Local Plan has been further developed. As part of our Local Plan process, WDC has also written to relevant neighbouring authorities to establish

⁴ ['Focused' Draft Wealden Local Plan \(Regulation 18\), February 2026](#)

⁵ [Draft Wealden Local Plan \(Regulation 18\), March 2024](#)

whether any proportion of our unmet housing need can be accommodated within neighbouring administrative areas. We note that RDC has written on this basis to WDC also and have responded to this separately.

Strategic Gaps and Development Boundaries

WDC notes that whilst the spatial development option to consider development within strategic gaps has been discounted through the SA process, the Local Plan does reference that sites within designated strategic gaps (in both the Development and Site Allocations Local Plan (2019) and adopted Neighbourhood Plans) have been assessed through the HELAA and that individual sites may come forward, which would result in redrawing their boundaries. Notwithstanding earlier comments made on the principle of strategic gaps within the draft Rother Local Plan, WDC would support additional sites coming forward in this way, if the principal functions of the strategic gaps are not compromised by development and would otherwise be sustainable locations. In addition, WDC supports the intention for the Council to review development boundaries, based on the final site allocation policies. Through RDC reviewing strategic gaps and development boundaries, there may be opportunities to promote further growth. This would assist RDC in maximising all available opportunities for development, recognising that RDC may be unable to meet its own housing need and that neighbouring authorities are similarly constrained and are therefore limited in their ability to assist with unmet housing need.

Spatial distribution of Growth and Sub-Area Visions

WDC notes that growth opportunities have been presented by five sub-areas, consistent with the last version of the Local Plan published in April 2024. This focuses housing (60%) and employment (56%) growth within Bexhill with smaller amounts in the remaining 4 sub-areas, noting that there are constraints for larger scale development in those locations due to the extent of the High Weald National Landscape and other environmental designations. The sub-areas of Bexhill, Battle and Northern adjoin the administrative boundary of Wealden District and as such, development within these areas would likely result in strategic cross-boundary infrastructure implications.

WDC support the vision for each of the sub-areas, with the following commentary and observations:

Bexhill – WDC support the consistency in policy approaches for sustainable drainage within the hydrological catchment of Pevensy Levels SAC and Ramsar Site and we note reference in the vision to Bexhill playing an active role in the Pevensy Bay to Eastbourne Coastal Management Scheme. WDC would support continual engagement with RDC as to the development of their policy approach to Coastal Change Management to ensure consistency in approach at the strategic boundary of both authorities. RDC will be aware that WDC has prepared a new draft policy on Coastal Change Management (Policy CC9 – Coastal Change Management Area) in its draft ‘Focused’ Wealden Local Plan (February 2026) for the section of Wealden’s coast (at Pevensy Bay) within Wealden’s planning control and it will be important to assess the implications of any future policy along Rother’s neighbouring coastline from Norman’s Bay across to Bexhill.

Battle and Surrounding Settlements – The vision states that sensitive development will be delivered in villages surrounding Battle at densities consistent with the surrounding area, where it is sustainable and does not negatively impact on the setting of the High Weald National Landscape (NL). There is a small portion of Rother District within this sub area around Catsfield, which lies outside of the High Weald NL. Whilst RDC propose three site allocations within this settlement, it is unclear through the SA and HELAA whether all site opportunities have been assessed, and whether additional land could be brought forward adjoining the identified sites.

Northern Rother - WDC support the overall vision, with the observation that stations identified as transport hubs are also important to Wealden residents, most notably Stonegate, which is located nearest to Wealden's administrative boundary and serves settlements such as Heathfield.

WDC note that RDC are seeking to meet its employment need, as well as its Gypsy, Travellers and Travelling Showpeople Accommodation need in full and we therefore have no substantive comments to make in relation to that part of the development strategy. WDC will support RDC alongside other Local Planning Authorities (LPAs) in East Sussex in an update to the joint Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (GTAA) that was last published in 2022 and to liaise on the implications of that update.

Potential Development Sites close to Wealden's Administrative Boundary

WDC considers that the most significant cross-boundary impacts arising from growth within Rother District are likely to occur in locations immediately adjoining Wealden's administrative boundaries. As discussed above, this will relate to proposed development in Bexhill and Catsfield specifically, although this may also include development at Burwash and Ticehurst. The greatest cross-boundary impacts will be seen in Bexhill, where cross boundary transport and water infrastructure are of critical importance to both areas.

Given the scale and location of the emerging site proposals, WDC considers that early and ongoing cross-boundary engagement is critical in ensuring that any development brought forward near the administrative boundary of Wealden District is planned, justified, and deliverable, and does not result in unacceptable impacts on Wealden's infrastructure or communities.

To this effect, it will be important to continue to engage on work being undertaken on our respective Transport Assessments for the Local Plan, as well as considering the outputs of the Wealden and Eastbourne Water Cycle Study, which will be factoring in the impacts of proposed growth in Rother. In addition, WDC is working on its Infrastructure Delivery Plan (IDP) to support the Wealden's growth strategy and therefore, any opportunity to engage further with RDC on this will be critical. Therefore, continued meetings with RDC to discuss these strategic issues will be essential to help shape our respective Local Plans through to the Regulation 19 stage.

Supportive Evidence and Sustainability Appraisal (SA)

WDC welcomes the publication of the Council's new and updated evidence base, together with the supporting topic papers accompanying this consultation. RDC acknowledges that further detailed work and testing is required to clearly and robustly justify the proposed distribution of growth and to demonstrate that all reasonable opportunities to meet identified needs have been fully explored, in the lead up to its Regulation 19 version of the Rother Local Plan.

With regards to the SA, it appears that both identified and proposed allocation sites have been assessed under each of the sub-areas in the main report, and that other HELAA sites that have been assessed, but rejected, are included in the appendices. The HELAA appears to be the main basis for selecting or rejecting sites, without a more detailed SA assessment of the sites sustainability to influence those outcomes. For instance, the SA does not provide a summary of the issues for the rejected sites. In addition, several of the sites which have been rejected for development have similar sustainability credentials and outcomes within the SA as to those sites that have been selected for proposed allocation. A greater understanding and explanation of how the SA process has been used to influence the outcome of the suitability of sites is particularly important, especially in relation to rejected larger strategic sites that have been promoted by landowners and appear as available for development.

WDC therefore considers that additional work is necessary to establish an evidence-led spatial strategy that is logical, consistent, and capable of withstanding scrutiny. Strengthening the

evidence base in this way is essential to ensure that the draft Local Plan can demonstrate that it has fully assessed development capacity across the district and has adopted the most appropriate spatial distribution in line with the NPPF (December 2024) under paragraph 36.

Bewl Water

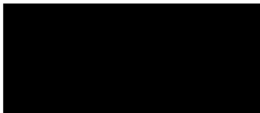
As you already acknowledge, Bewl Water straddles Tunbridge Wells Borough Council, Wealden District Council and Rother District Council administrative areas. It is noted that in this January 2026 Regulation 18 version of your Local Plan, there is new draft proposed policy at Bewl Water (Policy TC3) which covers issues such as landscape character, habitats and species, tranquillity, dark night skies and safeguarding the site for recreational, economic and social amenity. We question the necessity for this as a standalone policy given that all limbs of the policy are supported by other composite parts of your new Local Plan with some, but not all, specifically cross-referenced within the policy wording itself. We consider that this is unnecessary and constitutes unnecessary duplication of policy within the plan

Other strategic matters

WDC is committed to engaging constructively with RDC on all relevant strategic cross boundary matters such as housing, gypsy and traveller accommodation, economic development, transport, infrastructure and the impact of development on the natural environment, including the Pevensey Levels SAC and Ramsar site and High Weald NL. Continuing to engage on these matters will align with the work that is being progressed by both WDC and RDC as our Local Plans progress.

I trust that the above representation is helpful at this stage. If you have any further queries, then please do not hesitate to contact me.

Yours faithfully



Nichola Watters
Head of Planning Policy, Economy and Climate Change