

Rother District Council
Town Hall
London Road
Bexhill-on-Sea
East Sussex
TN39 3JX

By email only

23rd March 2026

Dear Rother District Council,

Thank you for consulting us on the *Rother District Council's Draft Local Plan – Development Strategy and Site Allocations (Regulation 18, January 2026)*.

Eastbourne Borough Council (EBC) welcomes the opportunity to engage with Rother District Council (RDC) on the Rother Local Plan.

EBC recognises the significant work that RDC has undertaken to update its spatial strategy, density approach, and site portfolio in the context of an increased 'standard method' local housing need and extensive landscape and environmental constraints. EBC is committed to on-going, constructive co-operation with RDC on strategic, cross-boundary matters, particularly where they affect the Pevensey Levels, and coastal flood risk management along the Pevensey Bay to Eastbourne frontage.

EBC notes the proposed landscape-led, 'Live Well Locally' strategy, and supports the overall approach that prioritises growth in Bexhill, with proportionate growth in Hastings Fringes, Battle, Rye, and the revised A21 corridor focus on larger settlements, which reflects settlement sustainability, infrastructure capacity, and the constraints of the High Weald National Landscape.

EBC notes that the 'standard method' housing need in Rother of 15,504 new homes over the plan period at an average of 912 homes per year is significantly in excess of the recent average annual of delivery 215 homes per year. Given the significant constraints in the form of national landscape designations and environmental designations, it is understood that that the evidence supporting the Draft Local Plan only identifies potential land for 8,427 new homes over the plan period (at an average of 495 homes per year), which would result in unmet housing need.

We can confirm that EBC has received a letter from RDC dated 4th March 2026 to

formally request EBC's assistance with accommodating unmet housing needs arising in Rother. We will respond to this letter separately.

EBC supports RDC's intention to maximise appropriate densities (Option B) and brownfield capacity. However, given the strong infrastructure and public transport provision within the Bexhill Urban Area, there may be scope to consider increasing density expectations in this location to 150 dph, which would be a similar density approach to that which is being taken to Eastbourne town centre in the Eastbourne Draft Local Plan. This approach to density in urban areas is identified in Option C. It is suggested that a density expectation of 150 dph could be reflected in Policy BX1, which currently seeks to achieve densities of at least 110 dwellings per hectare in the Bexhill Urban Area.

EBC welcomes recognition that significant parts of West/North Bexhill lie within the Pevensey Levels hydrological catchment and require enhanced SuDS performance, multiple treatment stages, and careful phasing to protect the Ramsar/SPA habitat site. EBC also supports the commitment to prepare Habitats Regulation Assessment, updated Strategic Flood Risk Assessment (Level 2), and to work with infrastructure providers through the Infrastructure Delivery Plan.

EBC welcomes acknowledgment in the Draft Local Plan that Bexhill will "play an active role" in the Pevensey Bay to Eastbourne Coastal Management Scheme, and that RDC intends to collaborate with neighbouring authorities and the Environment Agency. Further engagement with EBC and Wealden District Council on the Local Plan approach to this issue is considered to be important.

EBC notes that unlocking West Bexhill depends on addressing capacity and safety constraints at the A259 (Little Common corridor and roundabout) and other junctions. EBC supports the commitment to detailed transport modelling, and both EBC and RDC will be using the East Sussex County-wide Transport Model to assess the transport impacts of both Local Plan, which will ensure that any cumulative effects are identified and managed.

EBC notes RDC's Housing and Economic Development Needs Assessment (HEDNA) (produced jointly with Hastings Borough Council) identifies a requirement for Rother of 74,189 sqm of employment land, and that the Draft Local Plan identifies a supply totalling 97,774 sqm, with a significant proportion of the employment land supply identified for Bexhill. This would result in employment need being met in full. This is supported by EBC.

EBC and RDC have worked collaboratively on evidence of Gypsy and Traveller Accommodation Needs, as well as through an East Sussex-wide 'Call for Sites' for Gypsy and Traveller accommodation. EBC note that Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (GTAA) (2022) identifies a need for 28 pitches in Rother between 2020 and 2040, and that 10 new pitches have been approved since the base date of the GTAA. EBC supports the approach to making provision for the residual 18 permanent pitches, and will continue to work with RDC and other East Sussex authorities in updating the evidence on future Gypsy and Traveller Accommodation Needs.

EBC would welcome opportunities to continue to engage with RDC on strategic matters, particularly in relation to coastal defences and the cumulative impacts of development and growth on the Pevensey Levels and transport infrastructure. EBC is committed to engaging constructively with RDC, including the production of a Statement of Common Ground.

Yours faithfully

Nadeem Din

Head of Planning Policy

Lewes and Eastbourne Councils



Cllr Colin Swansborough

Cabinet Member for Regulatory Services, Staff and Performance and Enterprise

Eastbourne Borough Council

