

Please quote: RDC-LPR18-DS&SA-26  
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**Planning Policy**  
Muriel Matters House, Breeds Place  
Hastings, East Sussex, TN34 3UY

Dear Sir/Madam,

**Re: Rother Local Plan Development Strategy and Site Allocations  
Draft (Regulation 18) Version January 2026**

Hastings Borough Council (the council) welcomes the opportunity to comment on the Rother District Council (RDC) Local Plan Development Strategy and Site Allocations Draft (January 2026). We note that, unlike the previous draft (April 2024), this version contains proposed site allocations and area-specific policies.

The council notes that, in accordance with Regulation 4(4) of The Levelling-up and Regeneration Act 2023 (Commencement No. 11 and Saving and Transitional Provisions) Regulations 2026, should the Plan be submitted to the Secretary of State by 31 December 2026, it will be examined under the current planning system.

The council notes and welcomes the alteration to the plan period, now extending to 2042. This in line with the NPPF (December 2024) paragraph 22 which states that 'strategic policies should look ahead over a minimum 15-year period from adoption'.

*Strategic Spatial Objectives*

The Council welcomes Objective 5, which seeks to '*Deliver sustainable growth and regeneration in Bexhill and its edges, along with Hastings Fringes, with supporting infrastructure, contributing to the needs of the wider housing and economic market area*'. The council will continue to engage with RDC on matters required to support this objective, such as the joint Housing and Economic Development Needs Assessment (HEDNA).

The council also welcomes the addition of Objective 11, which seeks to prioritise the use of brownfield land and build to appropriate densities, whilst recognising local context and character.

*Development Needs*

The council recognises the difficulties faced by RDC in meeting the challenging housing targets set by Government. We note the increase in RDC's requirement from 733 dwellings per annum (dpa) to 912 dpa, equating to 15,504 over the plan period. This is in contrast to the adopted Core Strategy which contains a target of 335 dpa, and a current delivery rate of 215 dpa.

The council notes that the draft Plan sets a housing target of 8,427 dwellings over the plan period, equating to 495 dpa, a shortfall of 7,077 over the plan period (417 dpa) when compared to the local housing need figure arising from standard method. This is roughly 54% of the standard method. The council notes the extensive constraints within the district and believes the housing target in the draft Plan is reasonable. It is noted that both LPAs are in a similar situation in relation to being unable to meet local housing need in full. Discussions regarding the matter have taken place, and neither council can accommodate any need from the other.

The council is committed to ongoing cooperation with RDC and other authorities to seek solutions to the housing crisis. It is noted that the councils are preparing a Statement of Common Ground which addresses these issues, and this will be published ahead of the Regulation 19 version of the RDC Plan (and the Regulation 19 version of Hastings' emerging Plan).

### *Strategic Gap*

The council notes RDC's assessment of an additional option to develop land within the strategic gap between RDC and Hastings (SDO14). It is noted that, following assessment of this option through the Sustainability Appraisal (SA), RDC has concluded any such option would undermine the principal intent of strategic gaps, i.e. to maintain the separate identity and distinctiveness between settlements and prevent coalescence. It may also be relevant to refer to the role of the strategic gap in terms of its multifunctional contribution to flood storage capacity, environmental and landscape protections.

It is noted that paragraph 5.13 refers to the protection of strategic gaps as a function of Policy DEV6 in the draft Rother Local Plan (2024).

### *Hastings Fringes*

The council welcomes the Vision for Southern Rother and the Hastings Fringes on page 71, and that development in this area will be sensitive and well connected to the urban fabric of Hastings. The council also notes that development of some 382 dwellings is proposed within Southern Rother and the Hastings Fringes over the plan period, comprising 135 from existing allocations and sites with planning permission, and 247 from new allocations, along with some 5,300m<sup>2</sup> of employment floorspace (3,500m<sup>2</sup> from new allocations). The council welcomes continued joint working with RDC to address infrastructure needs and other cross-boundary matters relevant to site proposals in this area, including land stability and flood risk management.

### *GU1 Land north of A265, Ivyhouse Lane, Hastings*

This is an existing allocation, and is proposed to be allocated for employment uses, comprising 3,300m<sup>2</sup> of business floorspace. The site borders the northeast of Hastings borough and adjoins *ES7: Ivyhouse Lane, Northern Extension* in the Hastings Draft Local Plan Preferred Options (Regulation 18) February 2026.

The council welcomes criterion i which requires a comprehensive scheme to be developed in conjunction with ES7. The development criteria should be reviewed such that they align with ES7, such as adding an additional criterion to require a lighting plan to minimise light spill into the National Landscape. The council will continue working with RDC as both Plans are progressed towards Proposed Submission stage, so that these two policies align.

### *GU2 Brackendale, Rock Lane, Hastings*

The council welcomes the policy wording, in particular criterion iii which requires a comprehensive scheme to be developed in conjunction with the adjoining land in Hastings, namely site HS21 Land East of Rock Lane and HS13 Land North-West of Winchelsea Lane adjoining that.

### *GU3 Rock Lane Urban Fringe Management Area*

The council welcomes the proposed allocation of area GU3 as a buffer policy, protecting the openness of this urban fringe area and green infrastructure at the borough edge. The council also welcomes acknowledgement that the quality of this area could be improved.

#### *WS2 Land east of Beaney's Lane, Hastings*

This is another cross-boundary site, 7.6ha in total, with around 0.4ha within Hastings borough (proposed allocation HS23: Land East of Beaney's Lane, The Ridge). The requirement to produce land stability and geotechnical reports (criterion xiii) as part of any planning application is welcomed. Whilst the policy does require vehicular access from The Ridge, it falls short of requiring a comprehensive scheme which incorporates the adjoining land (HS23) in Hastings. An additional criterion to this effect is required here.

#### *WS1 Land at Michael Tyler Furniture, Woodlands Way, Hastings*

This site adjoins the administrative boundary of Hastings and is proposed to deliver 40 dwellings. Criterion iv of the policy requires access from Woodlands Way in Hastings. The council welcomes the retention of the existing tree belts to the west and north of the site. It is not clear if the site would be connected with the adjacent WS2 and HS23 (Hastings) to the south.

#### *Vision for Bexhill*

The council welcomes the commitment to retaining the 'strong green strategic gap' between Bexhill and Hastings. This is essential to prevent the coalescence of the two settlements and protect the Combe Valley Countryside Park. The council is keen to continue working with RDC on cross-boundary flood risk and storage matters through the SFRA process.

The council acknowledges the continued aspiration for a new western bypass connecting Little Common roundabout with Ninfield road, designed to alleviate traffic through Bexhill on the A259. The council also welcomes the commitment from RDC to further transport modelling following the Regulation 18 consultation, and the council will be keen to work with RDC and the county council on area-wide modelling.

#### *Economy, Employment and Retail*

The council welcomes RDC's acknowledgement of Hastings and Rother comprising a Functional Economic Market Area (FEMA), evidenced by the joint HEDNA (2024). The council welcomes the employment pipeline identified in the Plan, which aims to meet identified needs in full, despite some large sites becoming unavailable. The council looks forward to working with RDC on updating the HEDNA in 2026 ahead of both Authorities' Regulation 19 Pre-Submission Plans.

The council notes the conclusions of the Rother Retail and Town Centre Uses Study (2023) and the subsequent decision not to allocate additional land in the district for new retail floorspace, save for minor mixed-use developments.

#### *Gypsies, travellers and travelling showpeople*

The council recognises RDC's strategy to deliver 18 pitches. This aligns with their requirement as set out in the joint Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (GTAA) (2022). The GTAA established a need in Rother for 28 pitches. The council notes that since the base date of this study, 10 pitches have been delivered, therefore RDC are aiming to meet their requirement in full. The council welcomes continued opportunities to work with RDC on a cross-boundary basis to address any unmet gypsy and traveller needs.

#### *Infrastructure delivery general*

The council welcomes RDC's updated Draft Infrastructure Delivery Plan (IDP), and wishes to maintain engagement with RDC as they continue work in this area, especially insofar as development in areas

such as the Hastings Fringes may impact on services and facilities in Hastings, e.g. along The Ridge and Conquest Hospital.

*Statement of Common Ground*

The council looks forward to continuing engagement on the cross-boundary matters highlighted in this letter, and setting these out in more detail in the forthcoming Statement of Common Ground. In particular with regard to border sites GU1, GU2, WS1 and WS2 addressing issues around access, design and delivery, SuDS, landscape matters as well as appropriate policy criteria to ensure permission is not granted without agreement with the council (Hastings) and East Sussex County Council where required. Commitments to work on updating shared evidence base, such as the HEDNA and wider transport modelling, should also be identified.

Yours sincerely,

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