



# Rother District Council's Draft Local Plan 2020–2040

Consultation response  
**Rother Labour Group of Councillors**

Submitted 22.07.2024



# **Rother Labour Group response to the Draft Local Plan 2020–2040**

## **Overall comments**

As a group, we welcome the intention and direction of this thorough and well written draft Local Plan. As a document, it mostly aligns with our political vision in terms of Rother's future. We are glad to see much of the ethos from the Council's current plans and policies, as decided by the current administration, is embedded into this document. As a major part of the coalition administration, we are keen to ensure that every aspect of this document is ambitious, effective, and representative of the Council's vision for the future of Rother, in planning terms, right up until 2040. As such, we have compiled our comments and suggestions into this collective consultation response.

Whilst our response on individual parts of the draft Local Plan is set out below under the relevant headings, it is worth noting a few general comments from the outset.

Firstly, given this draft was compiled during the previous Conservative Government, there is reference throughout the document to government policy and plans which have been, will likely be or are expected to change. Particularly, the new Labour Government's planning reform, house building, and energy infrastructure plans suggest a new direction. Likewise, in both key priority areas (Green to the Core and Live Well Locally), there is a substantial shift in the focus and ambition of the new Labour Government. Whilst, a plan that looks over a decade into the future cannot of course pre-empt every policy or directional change that occurs, we feel that whilst this is still in the drafting stage, it would be advantageous to adjust and re-align the ambition and direction of the plan to match the intention of the current Government at the time of the plan's likely publication, rather than to that of a Government no longer in office, whose ambitions and priorities are unlikely to reflect the National picture, at least for the next 5 years.

Secondly, as is further mentioned particularly in relation to the Health and Wellbeing and Housing sections of this response, we would like to see more consideration given to the disparity of socio-economic circumstances between different areas of the district. We see an opportunity for the Local Plan to provide a framework for correcting disparities of wealth, health, and opportunity between these communities and, whilst we are delighted to see a focus on Health and Wellbeing, we do think this could extend further. More particular thoughts on this are included in the section specific responses.

Thirdly, we would like to see the incorporation of the evening/night-time economy and how that can be pursued through this local plan. This is vital for younger and working generations, improving jobs and wellbeing. Quality, well-paid jobs is a priority for us.

In addition, we notice there is little to no mention about upwards building and the development of flats, blocks, and other upwards development. This is something that needs to be considered, using safer modern cladding and building methods, to help address the housing crisis.

Lastly, before moving onto section-specific comments, we would like to record our sincere appreciation for the work of the officers and staff involved in this draft document and we hope our contributions above and below are of value, and duly considered.

## **Section 1: Introduction**

### **Introduction**

We think this introduction does a good job at explaining the Local Plan with a readable syntax. Our one suggestion here would be a little bit more on the history of Rother's plans – i.e. past plans and what the learning points from those are.

## **Section 2: Vision, Overall Priorities and Objectives**

### **Overall Priorities**

We support this description of the overall priorities.

#### **Overall Priority 1 – Green to the Core**

We agree with this priority. We are keen to ensure a just and fair transition to greener living, aimed at all in our District not just those who can afford the change.

#### **Overall Priority 2 – Live Well Locally**

This section mentions 'work' as just a small part of the overall objective. Given the government's desire to put work and growth as their main priority, we think it needs more of a mention. The plan should demonstrate how we will contribute to national growth targets.

The line at 2.13, 'securing economic improvement in a challenging local and national economic cycle that requires ongoing flexibility', needs clarifying as to its meaning. We also think this section needs to make more of economic growth.

### **Key Planning Issues**

No comments here.

### **Strategic Spatial Objectives**

We think this section needs to make more of economic growth, including how to facilitate a move to better quality jobs. This includes improving wage levels and bringing new, particularly green, technologies and investment to the area.

### **Strategic and Non-Strategic Policies**

No comments here.



## **Section 3: Green to the Core**

### **General Comments on the Green to the Core Section**

We support this vital part of the plan, a key priority of the Council and the current administration. We think more reference is needed in relation to supporting community energy generation infrastructure, the distinction of supporting a just/fair transition to a greener society that considers negative effects and their mitigations. We also think more could be made of some of the co-benefits of green initiatives, in terms of improved socio-economic outlook (i.e. new jobs, cleaner air, better public transport infrastructure).

### **Policy GTC1: Net Zero Building Standards**

The reference to Government Ministerial Statement about rejecting increased environmental standards (3.17/3.18) is out of date given the change of government, as mentioned in the opening section of this response document.

### **Policy GTC2: Net Zero Retrofit Standards**

We support this policy.

### **Policy GTC3: Construction Materials and Waste**

We support this policy.

### **Policy GTC4: Water Efficiency**

We support this policy.

### **Policy GTC5: Heat Networks**

We support this policy.

### **Policy GTC6: Renewable and Low Carbon Energy**

We think the plan could include reference to tidal energy and offshore energy generation. We agree that roof-based solar should be encouraged, if not mandated, where appropriate. Our view is that wind turbines, and in some cases - solar farms, are not inherently detrimental to the landscape, and are, in fact, a net positive that should be encouraged. We would like to see support for local power plans and commitments to developing renewable power as close to communities as possible.

### **Policy GTC7: Local Nature Recovery Areas**

We think rewilding is good for the environment, but should not include gutters, property boundaries or roadways.



## **Section 3: Green to the Core (continued)**

### **Policy GTC8: Biodiversity Net Gain**

We think this is a positive policy. We would like to see emphasis to make sure re-wilding is active and well thought out (more than just weeds) to have maximum impact, also with some consideration of appearance.

### **Policy GTC9: High Weald National Landscape (AONB)**

We support protecting the HWNL/AONB, although given the pressing housing need, we also support considerate exceptions to this and the careful expansion of smaller settlements to account for population growth.

## **Section 4: Live Well Locally**

### **General Comments to the Live Well Locally Section**

We consider this a vital priority, and we are glad to see it in the plan. However, there is always a danger that Live Well Locally becomes a slogan with little depth. In particular, the socio-economic aspects of living well can be overlooked and we are keen to ensure these are robustly fleshed out in this document.

We think the Live Well Locally section should show a greater focus towards accessible housing that supports not only disabled residents with mobility needs but also “future proofed” homes that provide flexibility as residents age as per the LGA.\*

We think there should also be reference to neighbourhoods being designed according to Dementia and Autism friendly principles, similarly, reducing reliance on social and health care and enabling residents to continue to use them longer than otherwise might be the case.\*\*

The plan refers to social and affordable housing elsewhere, but we wondered if it might be beneficial to give this additional mention as a key aspect of living well locally, especially in connection with the Council’s Socio-Economic Duty. It is a key part of enabling residents to stay in the communities they were born in, ensures the resilience and diversity of those communities, and aids cohesion.

\* <https://www.local.gov.uk/publications/housing-ageing-population>

\*\* <https://www.stir.ac.uk/research/hub/publication/529023>

\*\* <https://www.local.gov.uk/our-support/partners-care-and-health/autistic-and-learning-disabilities/autistic/housing>

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## **Section 4: Live Well Locally (Continued)**

### **Policy LWL1: Compact Development**

We support this policy.

### **Policy LWL2: Facilities & Services**

We support this policy.

### **Policy LWL3: Walking, Wheeling, Cycling and Public Transport (Outside the Site)**

We support this policy.

### **Policy LW4: Walking, Wheeling, Cycling & Public Transport (Within the Site)**

We support this policy. We think car clubs / sharing should be encouraged, although not at the expense of adequate public transport connections, EV points or disabled parking access.

### **Policy LWL5: Distinctive Places**

We support this policy – a good example of how to actively encourage better design.

### **Policy LWL6: Built Form**

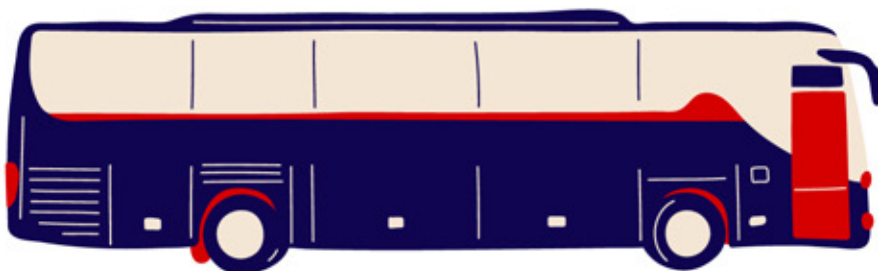
We support this policy.

### **Policy LWL7: Streets for All**

We support this policy. Where drainage and signs are mentioned, we would hope this is supported by adequate maintenance and clearing.

### **Policy LWL8: Multimodal Parking**

We mostly support this. We have some concerns around the insecurity that could arise from communal 'remote' car parking. Hopefully this can be addressed through good design and considerations.



## **Section 5: Development Strategy and Principles**

### **Preferred Spatial Development Options**

We support these.

### **Strategy: Overall Spatial Development Strategy**

We support this strategy, although we wish to emphasise that the Council should be ambitious with housing provision and not shy away from denser or wider settlements where there is opportunity for good housing.

### **Delivering the Spatial Development Strategy**

At 5.44, we think it is important to highlight infrastructure and the need for pro-active instead of reactive infrastructure planning that accompanies developments or is built via CIL.

### **Vision for Bexhill**

We welcome the focus on employment growth (particularly in Bexhill North) and think this could be enhanced. Employment opportunities are a big factor in reducing inequality and improving outcomes. We think there is an absence here and throughout the document in relation to the evening/night-time economy and promoting this area of growth in Town and District centres to boost employment, social value and retain more younger residents.

### **Vision for Hastings Fringes and Radial Settlements**

We support this vision.

### **Vision for Rye and the Eastern Settlements Cluster**

We welcome the emphasis on strengthening connectivity, including the very welcome intention that Rye will become more connected as a hub for the cluster of eastern settlements. Emphasis should be given where appropriate to improving pedestrian and cycle infrastructure, including the King Charles Coast Path, and the wider street scape of the centre of Rye which has limited dropped kerbs. The need to enable greater accessibility, whilst maintaining the balance of the inherent nature of Rye, should be addressed as a priority as with other settlement areas.

### **Vision for Northern Rother**

We support this vision.

### **Vision for the Countryside**

We support this vision.



## **Section 5: Development Strategy and Principles (Continued)**

### **Strategy: Sites for Gypsies, Travellers and Travelling Showpeople**

We are supportive of this section, understanding the many sensitivities that surround this area of planning law. We appreciate the use of the GTAA (2022) to inform these plans. We query whether GTTS site provision may work better in less urban environments. Following issues with the Watermill Lane site, we think it is important to make sure sites are deliverable before marking them off as part of the allocation. We would prefer not to see sites proposed for planning by opponents of an existing site as an attempt to shift GTTS peoples to another part of the district, as we suspect has happened previously.

### **Development Potential and Targets**

We support this.

### **Housing Trajectory – Stepped Delivery**

We support this emphatically. We would encourage pushing the Council's ambitions on housing targets and would like to see modular homes possibilities factored in, particularly in relation to the Council's ambitions to have a Housing Revenue Account and Council Housing stock.

### **Policy DEV1: General Development Considerations**

We support this policy.

### **Policy DEV2: Comprehensive Development and Masterplanning**

We support this policy.

### **Policy DEV3: Development Boundaries**

We support this policy.

### **Policy DEV4: Retention of Sites of Community or Economic Value**

We support this policy.

### **Policy DEV5: Development on Small Sites and Windfall Development**

We support this policy.

### **Policy DEV6: Strategic Green Gaps**

We support this policy.



## Section 6: Health and Wellbeing

### General Comments on the Health and Wellbeing Section

We think it is great to see these previously absent considerations embedded into this plan, but we believe it can go further. Ambition around redistributed wealth and equitable quality of life through community design should be at the forefront, with much more weight given to the Council's socio-economic duty and anti-poverty strategy.

More requirement for social uplift where development takes place in deprived areas would be welcome. Emphasis on jobs and employment infrastructure is especially important for financial wellbeing.

Reference to building materials and design that is pro-actively preventative of mould, damp and heat loss issues in deprived areas would be welcome also. There's a lack of consideration for protected populations – particularly those with disabilities or added health needs. We think disabled-friendly at point of build, not at point of adaption, should be a standard.

Consideration to census data around clusters of protected populations (i.e. Areas with a larger black or Asian population for example, as well as areas of socio-economic deprivation) should be given to ensure that these areas receive equal or enhanced infrastructure, affordability, and design standards from developments.

Equal access to sports and recreation facilities, as well as public transport across diverse communities, should be a goal of this plan. More elaboration on factors of health (see ESCC's Health and Wellbeing work) and consideration towards them in development/design would be welcome also.

Developments that address a particular health or wellbeing need in an area that it can be demonstrated lacks that provision should be permitted, even against other planning weightings.

Stricter affordability thresholds and greater % of affordable provision should be given to development adjacent to deprived areas.

In contrast to the tightening of restrictions around betting/takeout/loan premises, there should be encouragement around social/nightlife related facilities such as clubs/bars, entertainment venues etc. and provision of facilities aimed towards younger demographics' social wellbeing should be given prominence.



## **Section 6: Health and Wellbeing (Continued)**

### **Policy HWB1: Supporting Health and Wellbeing**

We welcome this policy. We think the Local Plan should encourage, not just permit, greater facilities in this area. Where community cohesion is mentioned, we feel there is an opportunity to link this to the Council's Socio-Economic Duty and establish an intent to address socio-economic imbalances between communities. There should be more emphasis on how we use planning frameworks to tackle health inequalities. Support for community garden/allotment space is welcome, particularly in denser areas where private gardens are not possible with every property.

We agree that active travel is important. However, we think those with disabilities need more consideration, particularly where individuals cannot walk or cycle far. This would include looking at provision of seating and benches on active travel routes and solidifying the importance of improved public transport networks.

### **Policy HWB2: Health Impact Assessments**

We absolutely welcome this addition to the Local Plan. We think that the Socio-Economic Duty could be looped in here, as well as addressing the importance of Equality, Diversity, and Inclusion as part of assessing health impact, given the holistic nature of health across multiple socio-economic factors.

### **Policy HWB3: Reducing harmful impacts on Health**

This is something we welcome fully. However, we do have concerns that it is currently hard to differentiate in planning terms what sort of hot food takeaway businesses can operate in a location.

If it were possible to add strengthened conditions to limit the kind of hot food takeaways allowed to operate in a location, we would like to see special exceptions made where hot food takeaway shops can demonstrate their commitment to healthier lifestyles and climate mitigation (i.e. A high % of plant-based menu options, sustainable sourcing, visible calorie/nutritional information, and adequate healthy options).

We understand this might be more of a matter for licensing, but if there is any capacity within the Local Plan to provide a steer on these kinds of premises, we would appreciate it was given consideration.

Otherwise, we support the restrictions. Particularly, we think gambling premises should be hard to establish, given their harm, and should not be allowed at all in areas of high deprivation. We perhaps query where the Council's own lottery scheme fits into this, but we understand there is a big difference between a community lottery scheme and a betting shop.



## **Section 6: Health and Wellbeing (Continued)**

### **Policy HWB4: Community Facilities and Services**

We are glad to see the Anti-Poverty Strategy mentioned. We feel it should be mentioned more within the Health and Wellbeing section of this plan, alongside the Socio-Economic Duty.

We think co-location of services, as per the Anti-Poverty Strategy, is important to emphasise.

We think community facilities are a bedrock of successful neighbourhood design and that there should be facilities in every settlement to service all ages.

Reference to ESCC's Health and Wellbeing Strategy as well as the Marmot Report would be welcome too and would provide a wider-visioned evidence base for this policy and others.

### **Policy HWB5: Green and Blue Infrastructure**

We support this policy. Green space is important to health and wellbeing, particularly playing pitches and open recreational space. Likewise with rivers/waters.

We are glad to see these incorporated. We would like to see reduced dwelling number thresholds for playing pitch construction (150-200+ rather than 300+ perhaps).

We think something about requiring the use of landlocked sites for sports and recreation purposes where housing has not been deliverable for several years would be good if that is possible.

### **Policy HWB6: Public Rights of Way**

We support this policy.

### **Policy HWB7: Combe Valley Countryside Park**

We are keen to make sure the 'Strategic Gap' is seen as a green corridor/lung and not as a gap in the strategic priorities between local authorities (as has been misdescribed previously).

Perhaps a change of terminology would help here as we think the phrase 'strategic gap' has the wrong connotations. We support the policy itself.

## **Section 7: Infrastructure**

### **General Comments on the Infrastructure Section**

We feel there is currently too little provision for infrastructure and CIL often seems like it is not enough to address this alone. Local perception is that infrastructure is absent, and developments only add strain to services. This will only be addressed by proactive, effective infrastructure provision. Where it is possible to encourage this in the plans, we would support that.

### **Policy INF1: Strategic Infrastructure Requirements**

We support this policy.

### **Policy INF2: Digital Connectivity**

We fully support this policy. FTTP (Fibre to the Premise) is not only welcome, but sorely needed. 5G (and beyond) coverage is also important. Good connectivity that can compete with big cities is the key to sustaining our commuter and work-from-home economy, particularly in rural trainline-adjacent settlements.

## **Section 8: Housing**

### **Policy HOU1: Mixed and Balanced Communities**

We support this policy.

### **Policy HOU2: Affordable Housing**

We think Affordable Housing is vital. To build more affordable homes must be an important, overriding priority. We think much greater emphasis should be given to social housing in this and other relevant policies. We would like to see a higher social % in the affordable mix. This is the most pressing need, and developers need to step up, not look for viability loopholes. We also think the affordable housing-related policies (HOU2-HOU4) lack mention of the Council's ambitions towards regaining a Housing Revenue Account and eventually having Council Housing stock. This should be reflected in these policies and appropriate frameworks should be put in place within this plan to account for this. We also think housing for key workers needs to be considered and mentioned as an objective of this plan. Affordable homes should be a priority over CIL.

### **Policy HOU3: 100% Affordable Housing Developments**

We support this policy. However, as above, we think 100% developments should aim to be mostly social, preferably Council, housing. The Council's HRA ambitions need to be factored in.



## **Section 8: Housing (Continued)**

### **Policy HOU4: Allocating Sites for Wholly or Substantially Affordable Housing**

As above, we think developments wholly or substantially for Affordable Housing should be mostly social, preferably Council, housing. The Council's HRA ambitions need to be factored in here too.

### **Policy HOU5: Rural Exception Sites**

We support this policy.

### **Policy HOU6: Sub-division of Dwellings, and Houses of Multiple Occupation (HMOs)**

We support this policy, provided the homes remain of a good, liveable quality and are not overcrowded.

### **Policy HOU7: Residential Internal Space Standards**

We support this policy.

### **Policy HOU8: Access Standards**

We support going for Cat2 accessible and adaptable dwellings – this is important, and we think policy in this area should be as forward-thinking and progressive as possible. Accessibility at the onset of construction, rather than later adaption, is always preferred and prevents issues with long funding application times when waiting for needed adaptations. This should be emphasised in all relevant areas of the plan.

### **Policy HOU9: Specialist Housing for Older People**

We support this policy.

### **Policy HOU10: Residential Care Homes for Older People**

We support this policy.

### **Policy HOU11: Gypsies, Travellers, and Travelling Showpeople Criteria**

We support this policy, providing comments acknowledged elsewhere in this document in relation to GTTS provision.

### **Policy HOU12: Self-Build and Custom Housebuilding**

We support this policy, although social and affordable housing is much more of a priority.

## **Section 8: Housing (Continued)**

### **Policy HOU13: New Dwellings in the Countryside**

We support this policy.

### **Policy HOU14: External Residential Areas**

We support this policy.

### **Policy HOU15: Extensions to Residential Gardens**

We support this policy. We would like to see something in these plans about external drying spaces, particularly for flats, to avoid damp/mould issues.

### **Policy HOU16: Extensions, Alterations and Outbuildings**

We support this policy.

### **Policy HOU17: Annexes**

We support this policy.

### **Policy HOU18: Boundary Treatments and Means of Enclosure**

We support this policy.

### **Policy HOU19: Accesses and Drives**

We support this policy.

## **Section 9: Economy**

### **General Comments on the Economy Section**

We believe this is a fundamental part of the Local Plan and it is important the Council get this right. One major area that is missing, as mentioned previously further up the document, is the lack of evening/night-time economy provision.

This, we believe, will be key to economic regeneration in the area.

This will provide more jobs, a better social environment, improved wellbeing, a more diverse population, and is something that will attract young people, working professionals and visitors to our District. We think it is vital more is made of this in policy going forward. This plan could provide the framework to encourage this sort of improvement.



## Section 9: Economy (Continued)

### Policy ECO1: Supporting New Employment Development

We are conscious that talk of employment development of an 'appropriate' scale and nature could encourage NIMBYism of a sort. Perhaps this wording needs to be more considered, given the need to encourage more employment development. This includes the mentioned 'limited circumstances' of countryside economic development outside of development boundaries.

### Policy ECO2: Protecting Existing Employment Sites and Premises

We support this policy.

### Policy ECO3: Designated Town Centres

We support this policy. We think the District Centre provision is good, however we think there should perhaps be a more ambitious aim to make Sidley a Town Centre of its own by 2040.

### Policy ECO4: Retail and Leisure Impact Assessments

We support this policy, however we query whether the change in retail premises size thresholds in relation to requiring an impact assessment will have its intended impact, as retail operators and known brands (the dominance of whom, this change in requirements aims to guard against) can bring further trade and footfall to retail areas in some circumstances, which could improve trade for local/small businesses. We would hope the suggested impact assessments bear this in mind.

### Policy ECO5: Tourism Activities, Facilities and Accommodation

During Covid, there was a rush to convert properties that were designated long term lets to Airbnb-type short-term holiday lets. This has caused an imbalance in the local property market – pushing up the cost of long-term rents. Now there is an oversupply, but the current planning regulations make it very hard to convert these back to housing. Given the need for housing locally, consideration to making this process easier would be welcomed.

### Policy ECO6: Holiday Sites

We support this policy.



## **Section 9: Economy (Continued)**

### **Policy ECO7: Agriculture Development and Forestry**

We think there should be a balance between environmental and economic considerations where agriculture is concerned. It should instead be widely encouraged to develop more plant agriculture. However, we think current animal agriculture should be supported until such time as a just transition away from this use is possible, and that may require new infrastructure, for example a new abattoir. There should however be very thorough justification in terms of sustaining existing businesses for this to be acceptable development.

We would also like to see mention of carbon sequestration within farmland.

### **Policy ECO8: Agricultural Diversification**

We support this policy, echoing our comments for ECO7.

### **Policy ECO9: Local Employment & Skills**

More could be made of this section. Clarification about where the financial contributions for LESP monitoring go would be appreciated.

### **Policy ECO10: Equestrian Developments**

We support this policy.



## **Section 10: Landscape Character**

We support this section.

## **Section 11: Environmental Management**

We support this section.



## **Section 12: Heritage**

### **General Comments on the Heritage Section**

We value heritage and this section of the plan is important. We need to make sure heritage preservation does not get in the way of better living, however. Particularly where it comes to disabilities and overlap with the Health and Wellbeing focus, we would not want to see heritage get in the way of accessibility needs or general wellbeing. We need more modern designs and standards to attract professionals like doctors, and young people to live here. And in lower socio-economic areas (LSOAs) with higher levels of deprivation, the expense of certain heritage elements needs to be considered. Emphasis should be on the appearance of retained heritage elements rather than actual replication/sustaining of heritage elements. As a particular example, we believe Heritage-effect uPVC windows should be acceptable on first floor windows in the Bexhill Conservation Area, where they create the same visual effect as the currently required traditional timber windows, but at less cost and greater energy efficiency for tenants. Overall, our steer on heritage is that balance is needed and the need for modern living standards need to be considered.

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### **Conclusion to the Rother Labour Group Response**

To conclude, we support this forward-thinking and well written draft of the Local Plan, pending changes made to reflect our feedback and following consideration of other consultation responses.

Again, we reiterate our appreciation for the Officers and Staff involved in the creation of this document.

With Regards,

### **The Rother Labour Group of Councillors**

Cllr Christine Bayliss (Group Leader)

Cllr Sam Coleman (Group Deputy Leader)

Cllr Fazlul Chowdhury

Cllr Cheryl Creaser

Cllr Gareth Delany

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