

Rother Local Plan 2039

New Local Plan

Early Engagement Document

*Version published for information on the Progress of the Rother District Local Plan
in the lead up formal Public Consultation at the Regulation 18 Stage*

April 2021



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1. Introduction

Why a new Local Plan?

- 1.1. Rother District Council's (RDC) current Core Strategy Local Plan is now more than 5 years old, having been adopted on 29 September 2014. In line with the requirements of the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG), the Council must review Local Plans at least once every five years from their adoption date to ensure that policies remain relevant. The Council has followed guidance from the Planning Advisory Service (PAS) through their [Local Plan Route Mapper Toolkit \(October 2019\)](#) in order to review its extant planning policies. As part of this approach, an initial review of compliance of the extant Local Plan policies (Core Strategy and Development and Site Allocations – DaSA) with the NPPF and PPG has been undertaken.
- 1.2. In line with the approach advocated in the PPG, the adopted policies of the Core Strategy Local Plan (2014) and the Development and Sites Allocations Local Plan (December 2019) have been reviewed in order to assess whether they: (i) are still fit for purpose; (ii) are compliant with the NPPF/PPG; and (iii) are not considered to be out of date. Any existing policies that are still fit for purpose may be carried forward into the new Local Plan. In summary, the overall review and compliance check sets out that policies require updating. Therefore the Council has committed to producing an new Local Plan, as stated in its Cabinet Report¹ dated 30 July 2018, to cover the planning period 2019-2039. This time period ensures that at least a 15 year plan is in place on the adoption date by the Council. The plan could take 2 to 3 years to produce, based on previous experience and indicative timescales.
- 1.3. The Rother Local Plan will be the spatial development plan that sets the strategic policies for the distribution and development of residential uses, employment and supporting infrastructure, across the District. It will also be a key delivery tool for the objectives set in the revised Rother Corporate Plan. It will be based on the key themes of the Corporate Plan: Places, People and Prosperity (with the overarching theme of Performance) and its spatial objectives will align with and be presented under the Corporate Plan objectives. The new Local Plan has been identified in the draft Corporate Plan as a critical delivery tool for its objectives.

¹ CB18/14 refers

What is the Purpose of this Document?

- 1.4. This document has been developed and reviewed, further to undertaking targeted early engagement with statutory bodies between 21 August and 16 October 2020. The Council has received initial support from the Planning Advisory Service (PAS) and have followed the approach advocated in PAS guidance to scope out the requirements for the Local Plan.
- 1.5. The intention of this document is to outline the Council's approach to how it will develop its Local Plan, the identification of key strategic issues to be assessed, and how key stakeholders and neighbouring authorities may be involved at an early stage, to assist with meeting the requirements of the 'Duty to Cooperate'. An assessment of how the Council intends to approach its specific duties is published separately through an Engagement Strategy which has also been reviewed further to targeted early engagement.

2. What is the focus for the Rother Local Plan?

- 2.1. The Rother Local Plan is anticipated to cover the 20 year planning period from 2019-2039. It will provide the policy mechanism to deliver a step change in housing delivery compared to more recent delivery rates, respond to the Local authority's recently declared 'Climate Change emergency' through a green policy agenda and ensure the Plan delivers for the needs of a growing local population. It is anticipated that the key deliverables that are required in undertaking the Local Plan include the following (Figure 1), which also provides reference points for more information to explain their delivery:

Figure 1: Key Deliverables in preparing for the production of the new Local Plan and reference points

<i>Local Plan Deliverables</i>		<i>Reference Points</i>
KD1	<i>A Vision for Rother in 2039: Members, stakeholders and the wider local community to be involved in setting a vision for the Local Plan that is a spatial delivery tool for the Corporate Plan</i>	<ul style="list-style-type: none"> • Stage 3 – Visioning, from the Scope of Work (Figure 2)
KD2	<i>Spatial Objectives: Members, stakeholders and the wider local community to be involved in producing a set of spatial objectives cross-referenced to the key themes of the Corporate Plan;</i>	<ul style="list-style-type: none"> • Stage 3 – Visioning, from the Scope of Work (Figure 2)
KD3	<i>RDC/HBC Shared Statement/Approach for Future Development and Prosperity for Hastings and Bexhill. Scope further opportunities to work together with Hastings Borough Council;</i>	<ul style="list-style-type: none"> • Stage 3 – Visioning, from the Scope of Work (Figure 2)
KD4	<i>Identification of the Key Planning Issues and Challenges for Rother District, linked to the development of the Sustainability Appraisal Scoping Report;</i>	<ul style="list-style-type: none"> • SA/SEA Scoping Report
KD5	<i>An identification of the baseline need for housing and business/commercial development to be delivered</i>	<ul style="list-style-type: none"> • Stage 1 – Joint Working, from the Scope of Work (Figure 2) • HEDNA Report
KD6	<i>An identification of the various strategies/approaches to how the Council may consider meeting its overall need</i>	<ul style="list-style-type: none"> • Stage 2- Scoping Evidence and Approach, from the Scope of Work (Figure 2)
<i>Overall Project Deliverables</i>		<i>Reference Points</i>
KD7	<i>A list of policy areas that the new Local Plan will need to address and those policies that will be saved in previous Local Plans</i>	<ul style="list-style-type: none"> • Full scoping assessment in the Council's internal PID
KD8	<i>An assessment of the evidence base required with draft timeframes and deliverables, with resource and projects needs to inform the Local Development Scheme</i>	<ul style="list-style-type: none"> • Stage 2 – Scoping Evidence and Approach, from the Scope of Work (Figure 2), • Appendix A of this document
KD9	<i>How the Council may approach the formulation of policies through the development of background/topic papers and direct links to the Sustainability Appraisal</i>	<ul style="list-style-type: none"> • Stage 2 – Scoping Evidence and Approach, from the Scope of Work
KD10	<i>The key tasks that the Council consider will need to be undertaken in the lead up to Regulation 18 consultation</i>	<ul style="list-style-type: none"> • General Scope of Work and Timescales

2.2. The process of undertaking a full review of Rother's extant planning policies has helped in identifying the key issues that will need to be addressed in the new Local Plan. Whilst not an exhaustive list, these key areas include:

- **Overall review of the spatial development strategy** – the need to maximise opportunities for the provision of residential development in line with the level of need identified through the standard methodology, along with delivering for the needs of employment and commercial development over the planning period;
- **Development boundaries** – that until a 5 year housing land supply is demonstrated, the presumption in favour of sustainable development applies, and as a consequence pressure may exist to extend settlement areas;
- **Overall housing numbers and 5 Year Housing Land supply** – until justified as otherwise, the Council must base its annual housing need as 736 units in line with the standard methodology. The Council has started work on its Housing and Economic Land Availability Assessment (HELAA) in order to identify sites that could help meet local need;
- **Supply of Small Sites** - The Council must develop a policy approach that supports the NPPF direction of at least 10% of housing delivery on small sites (1ha or less in size), unless there is strong evidence and justification for a departure from this; and
- **Employment Land** - Flexibility should be built into the business/employment land policy so that it is capable of responding to changes in circumstances, due to the volatility of the economic market and the changing and emerging needs that may arise from neighbouring authorities as they produce Local Plans and collect evidence at different timescales.
- **Delivering the Council's Green Agenda** – Developing viable policies through the Local Plan that support the Council's Environment Strategy ambitions and targets as well as delivering Biodiversity Net Gain and enhancing Green Infrastructure Networks.

2.3. In addition to these key areas, a comprehensive assessment of the policy requirements of the NPPF has been undertaken in the Council's internal Project Initiation Document (PID). This ensures that all relevant requirements are taken into account when scoping out the Local Plan at an early stage, and are not assessed retrospectively once the Local Plan has been finalised.

2.4. It is considered that due to the age of the evidence base for the Core Strategy Local Plan and Development and Site Allocations Local Plan, that a number of new evidence documents will need to be commissioned to support the New Local Plan. This will therefore result in new policies for, but not limited to, the quantum of residential, business and commercial development across the District. The anticipated evidence base that is required to support the Local Plan is provided in Appendix A of this document.

3. What will be the outcomes of delivering the Rother Local Plan?

- 3.1. Once the new Local Plan is examined and adopted, the Council will have an up to date plan that can be used to appropriately steer development over the next 15 year period (from adoption). It is in the interest of the Council to prioritise the delivery of the plan to prevent speculative development being determined on a case by case basis, and potentially through the appeal process. Local planning policies will need to be reviewed at least every 5 years in line with the NPPF, although not necessarily updated if they are still fit for purpose.
- 3.2. Through undertaking a Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) Scoping Report the Council will develop its baseline data, indicators and monitoring framework to demonstrate the key sustainability issues in relation to the plan and will use the sustainability appraisal process to guide policy options and decisions made through the development and evolution of Rother's Local Plan. The Council has undertaken a joint working approach with Hastings Borough Council on its SA Scoping Report, to provide a complimentary SA framework along with a fit for purpose monitoring framework. This helps to demonstrate active and effective joint working on plan making at an early stage and provides early consideration of the monitoring process for the Plan. This will help shape joint working in the future and will ensure that cross-boundary spatial issues are taken into account early on in the plan making process.
- 3.3. The Council will have a Local Plan which has buy-in from the corporate team, its Council Members and its key stakeholders and partners to effectively manage development and its impacts across the District and wider into its neighbouring authorities. Effective cross boundary working through the Duty to Cooperate will ensure that this is achieved. The Council's Engagement Strategy identifies the steps that are required to deliver effective and ongoing

cooperation with key stakeholders and neighbouring planning authorities. This is a fundamentally important aspect of the Local Plan process, and recent Inspector decisions on Local Plans indicate the importance of early engagement and transparency of the process in plan making.

4. How will the Local Plan be developed?

- 4.1. The Council have prepared a scoping assessment of the work that is required for the early stages of Local Plan production in the lead up to the first formal public Regulation 18 consultation stage and this is presented at Figure 2. The list of key tasks is by no means exhaustive and will be added to as the Local Plan progresses and other issues and requirements emerge. In addition, the timescales for the delivery of key timescales are indicative and are subject to change, being reviewed on a monthly basis.
- 4.2. The following key stages and associated tasks will be undertaken to ensure that all relevant considerations are made in the development of the Local Plan (Figure 2):
 1. **Joint Working Opportunities:** Explore opportunities to work with neighbouring authorities on strategic cross-boundary planning matters ;
 2. **Scoping Evidence and Approach:** Determining all development strategy considerations and the supporting evidence base that will be required to deliver the Plan;
 3. **Visioning:** Working with Members, senior officers and other organisations to set the vision and strategic objectives;
 4. **Early Cooperation/Engagement:** Liaise with neighbouring authorities and key stakeholders early on in the process of preparing the Local Plan and meeting the Council's responsibilities under the Duty to Cooperate;
 5. **Option Development:** Preparing draft development options based on the initial evidence base;
 6. **Further Targeted Engagement:** Workshops with statutory stakeholders, developers/agents Parish and Town Councils and other relevant organisations;
 7. **Formal Duty to Cooperate:** Formal process for engaging with statutory stakeholders and producing Statements of Common Ground;

8. Production of First Consultation Report: Preparing the first formal version of the Local Plan for public consultation², which is tentatively called the ‘Preferred Strategy and alternatives’.

Figure 2: Local Plan Scope of Work

Key Tasks	Method(s)	Indicative Timescales ³
Stage 1 – Joint Working Opportunities		
Joint Commission of Housing and Economy Development Needs Assessment (HEDNA)	<ul style="list-style-type: none"> Hastings BC and Rother have jointly commissioned consultants to undertake the HEDNA to provide the baseline position with regards to housing and business land need, and to provide guidance on the requirements for specialist accommodation. 	<ul style="list-style-type: none"> Initial Final Report completed December2020
Joint working with Hastings BC on the Sustainability Appraisal Scoping Report	<ul style="list-style-type: none"> Meetings to discuss scope for Joint Stage A – of the SA/SEA Scoping, preparation of a Joint approach/methodology for Scoping Report Joint preparation of SA Scoping Report, including common SA framework that will be used to assess respective local plans Agreement to produce individual full SA/SEA Report after the Scoping Report stage 	<ul style="list-style-type: none"> Preparation of SA: November 2019 – March 2020 SA/SEA Scoping Consultation 17 April- 29 May 2020 Sign off Scoping Report - January 2021
Joint working on cross-boundary planning issues through existing working groups	<ul style="list-style-type: none"> Rother DC to provide a representative on working groups in relation to the following working groups: Ashdown Forest, Pevensey Levels Catchment, Combe Valley catchment, Gypsy and Traveller accommodation Assessment, and High Weald AONB Biodiversity Net Gain Explore opportunities through Duty to Cooperate discussions to use existing Working Groups 	<ul style="list-style-type: none"> Ongoing, meetings have been held since 2019, as they are long term strategic planning issues. Meetings are held at intervals agreed by all parties.
Explore opportunities for potential joint work on other evidence base reports	<ul style="list-style-type: none"> Explore opportunities for joint work with Hastings BC on Habitats Regulation Assessment (HRA) and Infrastructure Delivery Plan (IDP). Consultation and engagement on both reports will be undertaken widely with various stakeholders. Further opportunities for joint working may be identified at Stage 2 as the evidence base is scoped and commenced. 	<ul style="list-style-type: none"> Initial assessment: December 2019 – March 2020 An ongoing assessment will be made as opportunities may present themselves during the development of the Local Plan

² Regulation 18 consultation stage.

³ These are subject to change and will be reviewed monthly

Key Tasks	Method(s)	Indicative Timescales ³
Stage 2 – Scoping Evidence and Approach		
Scope the policies that will need to be updated and those which can be carried forward into the new Local Plan	<ul style="list-style-type: none"> Further to the detailed Policy Review, scope a list of policies that need to be revised, or that could be brought forward in the same form, with no change as they are likely to continue to be effective for development management purposes. 	<ul style="list-style-type: none"> Scoping December 2019 – January 2020
Development Strategy Considerations – consider all potential areas and types of site/land that should be considered	<ul style="list-style-type: none"> Consideration of the all potential development options for the District both palatable and unpalatable (as outlined in Figure 4 of this document). Undertake a baseline assessment of proportional distribution across the District to meet standard methodology targets. Consider the need for in-house settlement studies and other supporting evidence base to assist in the identification of land and help inform the HELAA process. 	<ul style="list-style-type: none"> Scoping the requirements of the HELAA: Early 2020 Confirm HELAA methodology: Summer/Autumn 2020 Detailed consideration of areas of search through the settlement studies to inform the HELAA: Summer 2020 onwards
Scope the evidence base that will be required to support the new Local Plan	<ul style="list-style-type: none"> Provide a list of planning policy issues and areas and determine the evidence base that is required to support development of policies. Undertake a detailed assessment of all evidence required and whether this can be undertaken in house or commissioned through consultants. Assess the potential for any further joint work with neighbouring authorities or across the county, as identified at Stage 1. 	<ul style="list-style-type: none"> Scoping of Evidence base was initially undertaken in December 2019 – February 2020 Reprioritisation of evidence base was undertaken in March/April 2020 due to the effects of COVID-19 on progressing the Local Plan Ongoing regular monthly reviews on the priority of delivering evidence base documents
Develop approach to Background/Topic papers and how this will inform decisions for the Local Plan	<ul style="list-style-type: none"> Create a list of topic/background papers (and their likely timing of development) that will be used to help develop policies in the Local Plan. Proposal to use this process to assess and develop policies and alternatives through the Sustainability Appraisal process. 	<ul style="list-style-type: none"> Scoping: Spring/Summer 2020 Preparation of background papers: Summer-Autumn 2021
Undertake a Risk Register/Assessment for the Local Plan (Refer to Section 7 of	<ul style="list-style-type: none"> It is important to consider the impacts of unforeseen changes in circumstances and ensure that any necessary mitigation measures 	<ul style="list-style-type: none"> Draft completed January 2020 (to be reviewed quarterly)

Key Tasks	Method(s)	Indicative Timescales ³
this report)	are identified.	<ul style="list-style-type: none"> Review undertaken in March-April 2020 based on the impact of COVID-19 lockdown measures
Stage 3 – Visioning and Objective Setting		
New Local Plan Questionnaire/Survey for Members and Town/ Parish Councillors	<ul style="list-style-type: none"> Prepare a questionnaire/survey containing key questions on strategic issues relating to the preparation of the Local Plan. Undertake early engagement through an electronic questionnaire with Parish and Town Councillors, along with District Council Members, engaging with other organisations at the same time, where relevant. Opportunity to engage with Members and the Parish and Town Council's on a facilities and services assessment as part of the settlement studies at the same time as the general Local Plan. 	<ul style="list-style-type: none"> Preparation of survey form April-May 2020 Early engagement undertaken 21 August – 16 October 2020 Early engagement with Town and Parish Councils on the Settlement studies Early engagement undertaken 21 August – 16 October 2020.
Analysis of Responses to Vision and Objectives	<ul style="list-style-type: none"> Analyse responses by Members and Town/Parish Councillors to reflect their priorities Ensure the responses are reflected in the draft elements for the vision and objectives as set out in this report. 	<ul style="list-style-type: none"> Analysis of responses completed Early 2021 Publication of this report, Spring 2021
Shared statement/approach working together with Hastings BC	<ul style="list-style-type: none"> Ongoing conference calls with Hastings BC to discuss joint working and Local Plan timescales. Discuss opportunity for Joint Member Steering Group overseeing the respective new Local Plan process. Discuss complimentary evidence base and how this can inform both Local Plans moving forward. 	<ul style="list-style-type: none"> Conference Calls - ongoing Member Steering Group - Summer 2020
Stage 4 – Early Cooperation/Engagement		
Early engagement with DM officers and other internal officers on key issues in relation to the new Local Plan	<ul style="list-style-type: none"> Focused conference calls and close working to gather expertise and knowledge from internal colleagues, seeking advice on policies that are effective and those that require amendment. Early involvement of DM officers on the settlement studies and the HELAA 	<ul style="list-style-type: none"> Summer 2020 and ongoing
Assessment of current Duty To Cooperate practices undertaken across the County and wider	<ul style="list-style-type: none"> Assessment of current groups that could be utilised or extended to cover Duty to Cooperate issues for the Local Plan Approach to be outlined in the Council's 	<ul style="list-style-type: none"> Spring 2020 Engagement on Duty to Cooperate Action Plan – Summer 2020, which will

Key Tasks	Method(s)	Indicative Timescales ³
	Engagement Strategy	become the Council's Engagement Strategy (Spring 2021)
Duty To Cooperate meetings with Neighbouring Authorities and development/progress of Statements of Common Ground	<ul style="list-style-type: none"> • Arrange protocol and set up meetings with: Hastings BC, Wealden DC, Folkestone & Hythe DC, Ashford BC, Tunbridge Wells BC, (Eastbourne BC – Employment) and East Sussex County Council, Kent County Council. There may be opportunities to hold conference calls in advance of formal meetings which cannot currently be held. • Assess opportunities to utilise existing groups, and whether collective meetings can be held on topic based issues. • Utilise best practice guidance from PAS Sussex wide event for all local authorities – online event (June 2020) • Confirmed approach to be outlined in the Council's Engagement Strategy 	<ul style="list-style-type: none"> • Some DtC work commenced, others to commence in Late Summer 2020 after engagement on this document • Early DtC work being undertaken as part of SA consultation (April-May 2020) • Engagement Strategy to be publish Spring 2021
Consultation on the Sustainability Appraisal Scoping Report	<ul style="list-style-type: none"> • Use opportunity for SA Scoping Report consultation with the statutory consultees to also undertake early engagement on strategic cross-boundary issues for the Local Plan with targeted organisations and neighbouring planning authorities. 	<ul style="list-style-type: none"> • Consultation undertaken in April-May 2020 on the SA/SEA Scoping Report and feedback has helped to shape issues to address in the Local Plan.
Undertake the Council's Housing and Economy Land Availability Assessment (HELAA)	<ul style="list-style-type: none"> • Commence work on the HELAA through reviewing the methodology, undertaking a call for sites and compiling a list of sites for desktop review. • Call for Sites to be delayed to ensure equal opportunities for all to respond to the consultation stage 	<ul style="list-style-type: none"> • Commence work: January 2020 • Call for Sites undertaken in Winter 2020/21. Formally closed in January 2021 but accepting additional sites.
Stage 5 – Option Development		
Senior Officers (Heads of Service and Executive Directors) meeting to discuss spatial principles and possible strategy options	<ul style="list-style-type: none"> • Initial meetings with Head of Service and Executive Director. • Joint Meeting/workshop to work through a series of development options for the Council: <ul style="list-style-type: none"> ➢ SWOT Analysis ➢ Existing evidence base ➢ Build on future evidence base requirements identified ➢ Need to consider whether any options are new and innovative, including if they have cross- 	<ul style="list-style-type: none"> • Meetings are ongoing, at least monthly during the initial stages of preparing the Local Plan

Key Tasks	Method(s)	Indicative Timescales ³
	boundary implications.	
Member Involvement to develop spatial development options	<ul style="list-style-type: none"> Member Steering Group to help steer and shape the Local Plan, once initial evidence base is complete 	<ul style="list-style-type: none"> Summer 2021 and ongoing regular meetings
Production of Housing/Employment Background Paper and Development Strategy to discuss options for development strategies	<ul style="list-style-type: none"> Set out options in a specific development strategy background paper and start to draft the SA report. 	<ul style="list-style-type: none"> Summer-Autumn 2021
Commission or undertake further evidence base studies to support the Local Plan (These have been identified in Appendix A)	<ul style="list-style-type: none"> Determine whether further baseline evidence is required to inform options identification at this stage (eg. environmental constraints, infrastructure capacity, or transport modelling) Joint work across the county on a transport assessment to support respective Local Plans across the county. Commission consultants to undertake discreet projects and undertake evidence base studies in house where practical. 	<ul style="list-style-type: none"> This has been brought forward in the Plan process with the knowledge that it will take some time to procure and complete projects, depending on their requirements and scale. Late 2020 - Commenced work on County-wide transport assessment
Consider how emerging or made Neighbourhood Plans may influence policy development	<ul style="list-style-type: none"> Consider the impact of emerging and made Neighbourhood Plans. Decide which elements will need to be considered in the Local Plan process, and how can NPs be a key tool for the delivery of the Local Plan 	<ul style="list-style-type: none"> Ongoing, but particularly in relation to option development – Summer 2021
Stage 6- Further Targeted Engagement		
Produce an Engagement Strategy	<ul style="list-style-type: none"> Monitor and revise the delivery and success of the Council's early engagement plan and Duty to Cooperate actions Focus on electronic engagement methods, responding to any changes in ability to hold meetings and any appropriate times in the future Produce a Consultation Plan for events to be held as part of the Reg 18 Consultation. 	<ul style="list-style-type: none"> Production of Engagement Strategy (Spring 2021) Reg 18 consultation plan to be produced late 2021-early 2022.
Statutory Consultees Informal Involvement (Workshop) – to include statutory infrastructure providers	<ul style="list-style-type: none"> Arrange workshop/s with stakeholders to: <ul style="list-style-type: none"> Discuss the vision and overall objectives Discuss potential development options - strategically Discuss any initial feedback/issues on impact of 	<ul style="list-style-type: none"> Autumn 2021

Key Tasks	Method(s)	Indicative Timescales³
	statutory functions/ infrastructure	
Potential engagement with key community groups, other infrastructure providers and planning agents	<ul style="list-style-type: none"> • Arrange workshop/s with stakeholders to: <ul style="list-style-type: none"> ➢ Discuss the vision and overall objectives ➢ Discuss potential development options – strategically 	<ul style="list-style-type: none"> • Autumn 2021
Stage 7 – Formal Duty to Cooperate		
Frequent and Ongoing Duty to Cooperate Meetings with Neighbouring Authorities	<ul style="list-style-type: none"> • Discuss options for development, impact on neighbouring authorities, likelihood of requiring need from LAs 	<ul style="list-style-type: none"> • Winter 2020 and ongoing, every 2 months (approximately)
Further informal engagement in order to develop the Development Strategy and Housing/Employment Background Papers	<ul style="list-style-type: none"> • Specific and discreet engagement on development options with stakeholders in relation to: infrastructure, transport and environmental impacts 	<ul style="list-style-type: none"> • Autumn 2021
Stage 8 – Production of First Consultation Report (Regulation 18 Stage) – Tentatively called the Preferred Strategy & Alternatives Report		
Ensure evidence base is complete (or in draft form) and identify areas of future work/policy gaps	<ul style="list-style-type: none"> • Monitor the delivery of the Local Plan evidence base • Speak to lead officers • Identify any deficiencies in evidence base 	<ul style="list-style-type: none"> • Winter 2020 onwards
Pre-Publication informal targeted consultation/engagement with key stakeholders	<ul style="list-style-type: none"> • Prepare potential information for informal targeted consultation with key stakeholders/neighbouring authorities (eg. Specific infrastructure providers, and neighbouring authorities) 	<ul style="list-style-type: none"> • Autumn 2021
Pre-publication consideration by internal officers and Members	<ul style="list-style-type: none"> • Internal steering groups and formal sign off before finalising the Local Plan for formal public consultation 	<ul style="list-style-type: none"> • Summer 2021 onwards
Pull together Consultation Report and supporting evidence base and material for public consultation	<ul style="list-style-type: none"> • Prepare a Draft Consultation/Engagement Statement • Publish any completed evidence base • Publish any draft Statements of Common Ground • Prepare any specific consultation questions and supporting text 	<ul style="list-style-type: none"> • Autumn 2021
Writing and publishing	<ul style="list-style-type: none"> • Preparing the Plan in draft form, amendments 	<ul style="list-style-type: none"> • Summer-Autumn

Key Tasks	Method(s)	Indicative Timescales³
the Local Plan	and full publishing on the relevant consultation software	2021
Formerly consult on the Preferred Strategy and Alternatives Report (Regulation 18)	<ul style="list-style-type: none"> • Formerly consult in line with the requirements of the Local Development Scheme. • Project Plan lead in time for Cabinet Dates and internal sign off 	<ul style="list-style-type: none"> • Late 2021/Early 2022

- 4.3. The Council has now concluded its Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) Scoping Report and has signed this off with Hastings Borough Council. This document identifies the key planning issues and challenges for both Rother District and Hastings Borough Council's and as such this is not detailed in this document, but is signposted to the SA/SEA Scoping Report.
- 4.4. The Council has also updated its Statement of Community Involvement (for public consultation) in line with the wider form of engagement and informal consultation that is planned for the new Local Plan. Temporary amendments have also reflected the recent changes made to national Planning Practice Guidance (PPG) to reflect the COVID-19 national lockdown social distancing measures and the need for remote means of engagement. This will ensure a consistency of approach and create best practice in relation to all future local plan documents.
- 4.5. Through the development of the Local Plan the vision, objectives, key issues and challenges will be determined. The following table (Figure 4) outlines the considerations that will be made by officers, Members and other stakeholders when determining the appropriate mechanism for delivering each element in the production of the Local Plan. As outlined in Figure 3 (at Stage 8), it is currently anticipated that the first formal public consultation stage (Regulation 18) on the Local Plan will take the form of a Preferred Strategy and Alternatives, with a prolonged period of early engagement to consider all development options and their planning implications. It is likely that the Council will need to consider a strategy which maximises the supply of residential and business development up to the need identified in the HEDNA. As such, there may be limitations to alternatives, and therefore it is considered that a preferred strategy consultation at this stage will be more appropriate.

Figure 4: Key Considerations to be made for the Local Plan

Element to be included in the Local Plan	Considerations	How they will be determined
Vision for Rother in 2039	<p>The following areas of focus were identified prior to early engagement on the Local Plan.</p> <ul style="list-style-type: none"> • Areas of focus to be incorporated into the Vision: <ul style="list-style-type: none"> ➢ Climate Change, ➢ Housing need, ➢ Sustainable Economic Growth, ➢ Environmental Protection, ➢ Historic Character, ➢ Tourism, ➢ Quality of life, ➢ Inclusivity for all. • Consider what has changed since the delivery of the Core Strategy. • Respond to the current elevated environmental and Climate Change focus by delivering a Local Plan which delivers the targets and ambitions of the Council's Environment Strategy. 	<ul style="list-style-type: none"> • Visioning/Objective Priorities of Members – Analysis of responses from early engagement exercise. The areas of focus to be prioritised in the vision include: <ul style="list-style-type: none"> ➢ Sustainable transport ➢ Maintained landscape ➢ Biodiversity ➢ Economic growth ➢ Beautiful well designed areas ➢ Conserving the High Weald ➢ Sustainable/low energy housing ➢ Community focus
Objectives for the Local Plan	<p>The following areas of focus were identified prior to early engagement on the Local Plan.</p> <ul style="list-style-type: none"> • Link proposed objectives to the key themes of the Corporate Plan: Places, People and Prosperity (Performance is an overarching objective) • Spatial and Strategic Objectives: Ensure the follow elements are incorporated into objectives, and understand that these may be interlinked: <ul style="list-style-type: none"> ➢ Places – Spatial Development Strategy, Urban Rother, Rural Rother, Sustainable Development ➢ People – Local Communities ➢ Prosperity – Sustainable Economy, Climate Change, Environmental Protection, Infrastructure and Connectivity 	<ul style="list-style-type: none"> • Visioning/Objective Priorities of Members – Analysis of responses from early engagement exercise. The areas of focus to be prioritised in the objectives include: <ul style="list-style-type: none"> ➢ Zero Carbon ➢ Broadband ➢ Sustainable Transport ➢ Transport Connectivity/facilities ➢ Community ➢ Affordable Housing ➢ High Weald AONB ➢ Preservation of village/rural & place identity ➢ Housing for local need ➢ Economic prosperity/employment
Shared Statement/Approach for future development and prosperity	<ul style="list-style-type: none"> • Shared Statement/Approach: Liaise directly with Hastings Borough Council, working together on joint evidence. • Discussed, but agreed not to prepare a joint Local Plan. Respective timetables allow for 	<ul style="list-style-type: none"> • A shared statement/approach will be considered through Duty to Cooperate meetings with Hastings BC. Consider an agreed shared statement or

Element to be included in the Local Plan	Considerations	How they will be determined
for Hastings and Bexhill (Joint Member Group)	<p>some synergy in evidence base and joint approach, but not looking to synchronise Local Plan delivery timetable.</p> <ul style="list-style-type: none"> • Working together on cross boundary strategic planning issues, such as infrastructure, housing and employment land provision. • Statement of Common Ground and Duty to Cooperate – prepare early in the plan making process 	<p>that will be outlined in respective Local Plans</p> <ul style="list-style-type: none"> • Identified opportunities to work together on evidence base e.g. Housing and Economic Development Needs Assessment (HEDNA) and the SA/SEA Scoping Report. • Develop a complimentary policy direction and delivery strategy for the wider housing and economic market (Housing Market Area and Functional Economic Market Area)
Key Issues and Challenges	<ul style="list-style-type: none"> • The following issues and challenges will be considered: ➢ Seeking to meet overall housing (including affordable and specialist) need in Rother District ➢ Securing economic improvement and regeneration ➢ Carbon reduction and adaptation to climate change ➢ Maintaining safe places to live ➢ Supporting strong, sustainable communities ➢ Planning for an ageing population ➢ Better access to jobs and services ➢ Conserving environmental quality, delivering Nature Recovery Networks and ensuring biodiversity net gain ➢ Better facilities for sports, leisure and culture ➢ Provision of strategic infrastructure to support the delivery of development (identified through the IDP and Infrastructure Funding Statement) ➢ Managing uncertainties and contingency planning ➢ Duty to Cooperate with neighbouring planning authorities and statutory organisations ➢ Meeting the requirements of the SA/SEA/Habitats Regulation Assessment and its related legislation 	<ul style="list-style-type: none"> • Key Issues and Challenges formalised through the development of the Council's SA/SEA Scoping Report. • Other mechanisms for identifying issues and challenges: <ul style="list-style-type: none"> ➢ Duty to Cooperate meetings, ➢ SA/SEA Scoping Report baseline position, ➢ the initial outcomes of the HEDNA study ➢ Infrastructure Delivery Plan and the Infrastructure Funding Statement
Development	<ul style="list-style-type: none"> • There are several considerations that will 	<ul style="list-style-type: none"> • The Council will firstly use its

Element to be included in the Local Plan	Considerations	How they will be determined
Strategy Considerations	<p>need to be made by the Council in seeking to meet is potential step change in residential development. All options and potential strategies will be considered, as follows:</p> <p>Spatial Principles for Planning Development:</p> <ul style="list-style-type: none"> ➢ Settlement studies ➢ Principles for development in the High Weald Area of Outstanding Natural Beauty (AONB), ➢ Strategic/Countryside Gap between settlements, ➢ Gypsy and Traveller Provision <p>Strategy Options:</p> <ul style="list-style-type: none"> ➢ Need to maximise supply of housing in line with the standard methodology identified level of need, ➢ Assess whether proportional growth across the District is appropriate and a realistic opportunity ➢ Focus on development along key transport corridors ➢ Urban Intensification and redevelopment ➢ Urban extensions including development along Hastings Fringes ➢ New settlements ➢ The role and relationship of Neighbourhood Development Plans ➢ Windfall Development Strategy ➢ Consider the capacity for growth in rural areas ➢ Delivery of renewable energy schemes and policy ambitions <p>Policy Options for Growth:</p> <ul style="list-style-type: none"> ➢ Consider the use of new or amended settlement development boundaries, ➢ Identify potential site allocations, ➢ Assess the capacity and sustainability of settlements through the evidence base, ➢ Balanced residential and commercial growth across the District, 	<p>Housing and Economic Land Availability Assessment (HELAA) to identify sites that are suitable, available and achievable for development. This study will not be dictated to by a housing target but will seek to identify the maximum supply of available sites.</p> <ul style="list-style-type: none"> • In seeking to maximise supply, and informed by the HELAA, the Council may consider a combination of various policy options as overall options in isolation may be limited. • Options for development will be discussed during the key tasks associated with 'Stage 5 – Option Development outlined in the Scope of Work'. • There will be early consideration of whether there are any cross-boundary locations for growth, and whether any locations have cross boundary strategic planning implications. • Once the Council has considered its development strategy, it may be necessary to engage with neighbouring LPAs to request their ability to help meet any unmet housing or employment need.

Element to be included in the Local Plan	Considerations	How they will be determined
	<ul style="list-style-type: none"> ➤ Consider affordable housing policies and exception sites, ➤ Consider infrastructure provision to support development ➤ Consider the overall viability of development to deliver the Council's 'Green Agenda' • Need to consider the potential for cross-boundary growth locations • If necessary, engaging with neighbouring LPA's to request their ability to assist with any unmet need 	
Topic/Background Paper approach to New Local Plan	<ul style="list-style-type: none"> • A topic paper based approach is proposed to ensure conformity with NPPF/PPG, other planning guidance and the development of policy options through the Sustainability Appraisal framework, to reach preferred policy options. A topic/background paper approach helps provide the level of detail that ensures explanatory text in the Local Plan is focused and not excessive. • The background/topic papers will need to remain focussed, explaining the development of policies, with appropriate cross references to and summarises of the Sustainability Appraisal, without repeating its specific purpose. • The Council will undertake a compliance check with Parts 2 to 4 of the PAS Toolkit as the Local Plan progresses. This will also assist in the overall development of the background papers. 	<ul style="list-style-type: none"> • Topic Background Papers could include (but not limited to): <ol style="list-style-type: none"> 1. Development Strategy: Housing and Employment numbers and distribution 2. Housing Policies 3. Employment and Commercial Development 4. Environmental and Heritage Management 5. AONB & Landscape 6. Infrastructure Provision 7. Development Management Policies 8. Community Facilities 9. Adapting to Climate Change 10. Development Boundaries and Strategic Gaps • Can generally follow the same structure, as proposed, but to be reviewed as they are prepared: <ul style="list-style-type: none"> ➤ Introduction ➤ Local Context ➤ National Policy Context ➤ Local Policy Context ➤ Issues/Challenges ➤ Evidence ➤ Policy Options/Alternatives ➤ Sustainability Appraisal

Element to be included in the Local Plan	Considerations	How they will be determined
		➤ Conclusions

4.6. The Council have identified the range of evidence base that is required to support the production of the Local Plan in Appendix A of this report. Some of the work on this evidence has commenced and others will need to be commissioned over the next few months or can be undertaken in house. The Council is aware of the resources that are required to undertake the new Local Plan. A detailed project plan for the Local Plan will be prepared, including briefs and project plans for all of the individual evidence base documents, including the resources required.

5. Early Engagement on the Local Plan

- 5.1 The Council has already undertaken informal consultation with various stakeholders through a targeted early engagement stage which sought the views of stakeholders on key issues to be addressed in the Local Plan. The targeted early engagement stage took place from **Friday 21 August – Friday 16 October 2020** through two different methods:
- An Early Engagement Survey Form: with Council Members, Parish and Town Council's and targeted local organisations; and
 - An Early Engagement Document and Duty to Cooperate Action Plan: with neighbouring planning authorities and Duty to Cooperate bodies in relation to strategic planning matters.
- 5.2 Whilst this document will not provide the full detail of the responses received, as this was only an informal engagement stage, summaries of issues raised have been provided where relevant. Through feedback received at the early engagement stage (Appendix B provides a list of respondents) it is now possible for the Council to develop initial thoughts on the strategic and high level aspects of the Local Plan, including the vision, spatial objectives and cross-boundary issues that will need to be addressed and these will be reflected in the Local Plan document that is published in support of the next Regulation 18 consultation stage. Feedback received on the Council's SA/SEA Scoping Report has also been fed in to the development of the Local Plan. The following tables (Figures 5 and 6) provide a summary of the feedback received through the Council's two targeted engagement exercises.

**Figure 5. Feedback received from Members and Town/Parish Councils
(including other local organisations) at the Early Engagement Stage**

Key Issue(s)	How Feedback will help Shape the Local Plan
Local Plan Vision for the District to the end of the Plan period	<p>The responses to this question will assist the Council in the development of a Vision for the Rother Local Plan for the period 2019-2039.</p> <p>It is important that the vision is short, snappy and represents the wider views of the local community and councillors. It is noted from the responses that the following important key themes or words should appear in the vision:</p> <ul style="list-style-type: none"> • Sustainable transport • Maintained landscape • Biodiversity • Economic growth <p>These key themes could be incorporated into vision statements that also help to draw out other key responses such as:</p> <ul style="list-style-type: none"> • Beautiful well designed areas • Conserving the High Weald • Sustainable/low energy housing • Community focus <p>It will be important for key Members to be involved in vision and objective setting for the Local Plan, and it is considered that this can be done at the next stage, taking into the account the analysis to this question</p> <p>In looking at how the District should look by the end of the Plan period, it is also apparent that carbon neutrality, affordable housing and improved access to facilities are important to local members and town and parish councils.</p>
Key objectives to deliver the Council's Vision	<p>The following top 10 themes were raised as those of the most importance:</p> <ul style="list-style-type: none"> • Zero Carbon • Broadband • Sustainable Transport • Transport Connectivity/facilities • Community • Affordable Housing • High Weald AONB • Preservation of village/rural & place identity • Housing for local need • Economic prosperity/employment <p>The objectives for the Local Plan will need to flow from the vision and be directly related to the overall strategic direction of the Plan. It will be important to create clear and concise objectives related to these key themes as the Local Plan progresses, and it is envisaged that key members will be involved as part of this process.</p>
Key housing issues	<p>The majority of responses consider that the nationally prescribed standard methodology target for the District is not achievable and desirable. However, this cannot be justified without evidence, and that will be a key role of the Local Plan evidence base to determine whether the levels of growth required can be supported, with a key aim to maximise housing and employment land supply.</p> <p>The most popular strategies to maximise the supply of housing, that have been raised include:</p>

Key Issue(s)	How Feedback will help Shape the Local Plan
	<ul style="list-style-type: none"> • Increased density of housing • Increased supply of smaller homes • Development on brownfield land • Regenerating existing stock • Distributing housing allocations more widely across the District. <p>All of the issues and options that have been raised will be explored by the Council as it will need to demonstrate that it has assessed all reasonable alternatives in the development of its spatial development strategy and options for growth. A key piece of the evidence base to justify this will be the settlement studies and the Housing and Economic Land Availability Assessment.</p>
Consideration of a new settlement	<p>The responses indicate a preference to considering the creation of a new settlement within the District with suggestions of possible locations. This is balanced against the High Weald Area of Outstanding Natural Beauty as a concern/constraint to new development. There was some support for collaboration with a neighbouring authority, with options around Hastings Fringes, North and West Bexhill being given as an example. There were responses which indicate that a new settlement should not be considered, with supporting arguments including the need for new development to be linked to existing employment opportunities, integrating growth to existing communities and restrictions of the High Weald AONB.</p> <p>Through the settlement studies and the HELAA analysis the Council will consider, based on the evidence that is available, if there is scope and justification for the creation of a new settlement. We will engage with key members on an on-going basis in the development of the Council's spatial development strategy.</p>
Growth options	<p>Approximately half of the responses supported growth being located in existing employment areas and those served by facilities and services, with a quarter explicitly not supporting this concept. Supporting statements include achieving sustainable development, residential development providing opportunities for urban and settlement regeneration, along with protecting the AONB were considered as important.</p> <p>Additional comments raised focus on the ability to allow growth in other locations, and to make places more sustainable by the development of additional services and facilities.</p> <p>The Council is currently undertaken detailed settlement work which will assess the overall sustainability of various settlements across the District. This will ensure the Council accords with the principles of sustainable development set out in the NPPF. It is inevitable that the Council will have to look at a combination of development options to meet the wider needs of the District, but the support for this specific type of development strategy is welcomed at this stage.</p>
Employment growth	<p>There is strong support for employment growth to be linked to where residential growth will be distributed, to ensure that there are local employment opportunities for people living and moving into the District. It allows for sustainable development by reducing the need to travel for work and ensuring that there are services available.</p> <p>Concerns raised include the fact that businesses will choose themselves the locations in which they wish to be based, and the changing pattern of working could impact the need and type of employment opportunities required in the future.</p> <p>Allowing for growth to support the rural economy was strongly supported in the responses, with key local services and facilities being highlighted as being required, along with flexibility to allow residential development for rural workers. A better internet service is required to support rural growth, but there is a concern that large scale growth could cause urbanisation.</p>

Key Issue(s)	How Feedback will help Shape the Local Plan
	<p>The strength in the responses indicate that there is need for a sensitive approach to rural growth through the development of spatial options. The benefits that residential and economic development can bring to rural locations will enhance their overall sustainability, and this will be assessed in detail through the Local Plan process.</p> <p>There was strong support for the development of live-work units across the District, however there was some commentary that this should be allowed flexibly to cater for changing economic needs over time and should not be dictated by a short term policy direction. Those that did not support stated that there are associated issues such as noise, traffic, parking and access for live/work units and they are generally not attractive to the property market. The Council will consider the evidence for live/work units and its supporting policy approach through the Housing and Economic Development Needs Assessment (HEDNA) that is an overarching evidence base document that supports policies for housing and employment across the District.</p> <p>The Council consider at this stage that it will require a balanced approach to growth where residential development is supported by employment opportunities and further commercial development, and this will be considered through development of the evidence base to support the Plan. Further engagement will take place with key members on the development strategy options as the Local Plan progresses.</p>
Town Centres	<p>There is overall strong support for existing town centres to be the focus for growth, which aligns with the principles of where 'main town centre uses' should be located sequentially in the NPPF. Town centres act as the heart of the local community and as such are important to the sustainability of settlements/locations.</p> <p>Some of the points raised in relation to ensuring the vibrancy and vitality of centres is now impacted by the change to planning use classes and permitted development rights that have or will be coming through amended planning legislation. This reduces planning controls on change of uses within town centre and other locations.</p> <p>There are other important considerations as many centres have important heritage and cultural value to the local community. There may be opportunities through the Local Plan to deliver mixed use development and regeneration of town centres, and this will be explored through its spatial development strategy and development options of key sites.</p>
Meeting wider Strategic needs	<p>Approximately 60% of the responses supported a complimentary approach with neighbouring planning authorities to meet wider overall need. There are opportunities to ensure a coordinated approach in principle through Duty to Cooperate meetings with all of the Council's neighbouring planning authorities. At these meetings planning issues of a cross-boundary strategic planning nature are discussed and emerging or published evidence is analysed and shared.</p> <p>As the evidence base for the Rother Local Plan develops and options for growth emerge, the Council will ensure that it engages and liaises with neighbouring planning authorities at the appropriate timeframe. This may also involve engaging with other statutory organisations on joint pieces of work. A recent example of this is the County-wide approach that is being developed to an East Sussex transport model to support the development of Local Plans across the county, which also involves significant input from East Sussex County Council and Highways England.</p>
Infrastructure	<p>The most popular responses to this question centred around the key issues of transport, including: bus, cycleways, road safety, footpath improvements, and higher level A21/A259 improvements. All the responses have been summarised as much as possible above.</p> <p>There are a number of smaller scale pieces of infrastructure that will need to be considered alongside growth for individual settlements. Where relevant, this can be</p>

Key Issue(s)	How Feedback will help Shape the Local Plan
	<p>factored into the settlement studies and the analysis of the options that will inform the emerging spatial development strategy as the Local Plan progresses.</p> <p>The Council will be preparing a detailed Infrastructure Delivery Plan to support the delivery of the Rother Local Plan and this will detail strategic and local infrastructure that will be required to support overall growth along with proposed timescales and methods of delivery.</p>
Climate Change	<p>The overriding response to help meeting the Council's Climate Emergency was promoting renewable energy and energy efficient buildings, with the Council leading by example, with improving biodiversity and sustainable transport modes being other popular responses.</p> <p>The Council will be proactively looking to help meet the Climate emergency by delivering schemes and developing policy which supports carbon neutrality and other ambitions of the Climate emergency. The Planning Policy team will need to work collaboratively with other departments within the Council along with external partners in order to deliver its ambitions.</p>
Protection of Natural and Built Heritage	<p>Many different comments were made in response to this question, with environmental issues and High Weald AONB issues ranking highly along with the design of new development being a prominent consideration. This also links to the High Weald AONB Design guidance which has been listed as a separate issue.</p> <p>The Council consider that it will need to strike the appropriate balance between environmental protection and the sustainability benefits of development when devising its spatial development strategy and all of these important considerations will form part of the sustainability appraisal of options as the local plan progresses. This ensures that the economic, social and environmental are considered comprehensively and effectively in line with the requirements of planning legislation.</p>
Local Communities	A variety of responses have been provided in answer to this question. The question is likely to form a key objective for the Council to ensure that the District is safe, enjoyable and accessible for all members of the community. It will therefore be important to consider all of these issues as policies are developed for the Local Plan.
Impact of Coronavirus pandemic	<p>The responses agree that there will likely be a permanent shift in how and where people work and as such the Council may need to review the findings of its HEDNA to take into account the changing economic needs of the District as we progress the Local Plan. General flexibility may be needed in policy in order to support an evolving national and local economic situation which may fluctuate over the plan period.</p> <p>The issues raised will be taken into account when developing policies. It is apparent that policies generally will need to have flexibility to allow for changing circumstances over the plan period with regards to the needs of the society and the changing national and local economy.</p> <p>It is clear, in line with answers to other questions that sustainable transport opportunities and access to better broadband network coverage will be the key infrastructure drivers that will help the District adapt to different ways of living and working. These are likely to become two important strands of the Council's key objectives that it will need to deliver for the Local Plan to be a success.</p>
Other Planning Issues	<p>The Council's leisure, recreation and cultural needs will be addressed through its evidence base for the Local Plan.</p> <p>The Council supports the Neighbourhood Planning (NP) process in line with the NPPF, PPG and planning legislation, and we will be investigating how the NP process can support the strategic and local planning ambitions of the Council</p>

Key Issue(s)	How Feedback will help Shape the Local Plan
	<p>moving forward.</p> <p>Responses received regarding Development Management (DM) issues will be forwarded to the DM Manager for their consideration as these relate specifically to planning decisions.</p> <p>The Council is mindful of the recommendations of the government's 'Planning White Paper' and we will consider the implications of draft national policy directions on the Councils evidence base and incorporate this generally in the production of the Rother Local Plan.</p>

- 5.3 The early engagement process with neighbouring planning authorities and other targeted stakeholders has resulted in the review of the Duty to Cooperate Action points along with amending the cross-boundary strategic issues of relevance to each organisation. Figure 6 provides a list of the specific action points which were required as a consequence of the early engagement responses, which have not been detailed previously in this document. The Council has amended its Engagement Strategy accordingly and this is also published as a supporting document alongside this Local Plan Early Engagement document.

Figure 6. Specific Actions Required by Rother District Council, in moving forward with the Local Plan

Action Point	How and when will it be delivered?
Review and update SoCG with Tunbridge Wells BC, Ashford BC and other neighbouring planning authorities as the Local Plans progress.	To be reflected in the Council's Engagement Strategy. An existing SoCG prepared and published by TWBC. It will not need to be amended until Rother's spatial development strategy is considered as part of the Local Plan preparation (late 2021/early 2022). Other SOCG will be amended at the relevant timeframes for consultation (Reg 18 and 19) of our respective Local Plans and this will be discussed at our respective Duty to Cooperate Meetings with neighbouring planning authorities.
Emphasis on the delivery of Biodiversity Net Gain and its importance in policy development for the Local Plan	This will be considered and delivered as the policies are developed for the Local Plan in the lead up to the Regulation 18 consultation stage. The Council will take account of best practice guidance and ongoing liaison with the Sussex Local Nature Partnership and High Weald AONB through workshops and discussions that will take place during 2021.
Consider the conversion of farmsteads as options for the development strategy in the Local Plan	This will be considered as part of development options after the completion of the HELAA and the settlements work. As a number of these sites will be smaller sites, the opportunity for windfall development to accommodate such development may be considered.
Include the Water Level Management Board (WLMB) with the Lead Local Flood Authority (LLFA) when undertake future engagement and consultations	The WLMB will be included at the same time as the LLFA when engaging on the SFRA or discreet projects in relation to the Local Plan. RDC will continue to liaise with these organisations as work is progressed in relation the SFRA, hydrological

Action Point	How and when will it be delivered?
	modelling for the Pevensey Levels and SuDS policy development in relation to the Pevensey Levels.
Undertake engagement on the Local Plan in line with the Duty to Cooperate Action Plan (including engaging with local authorities on developing and completing evidence base for the Local Plan) e.g. High Weald AONB Unit on landscape character issues	Follow the requirements of the Council's Engagement Strategy in engaging and consulting with various different consultees at the earliest opportunity during the development of the Local Plan. The next key stage of engagement will be on the completion of the initial internal settlement work, which will factor in sites submitted for consideration as part of the HELAA process.
Direct engagement with Hastings BC regarding respective HELAAs with regards to strategic issues of growth around the boundary	Hastings engaged directly with RDC on their draft HELAA, but not significantly in advance of their Regulation 18 consultation which commenced at the end of January 2021. As a result, following RDCs response to the consultation, a series of separate action points have been produced in order to work together on cross-boundary strategic planning matters. Rother DC will engage directly with Hastings BC once all sites have been assessed as part of the Rother HELAA and it is known which sites may be developable. This will not be known until Summer 2021 at the earliest
Move forward with the County-wide approach to the Transport Assessment to assist cross-boundary strategic issues related to growth	The Council has commenced early stage discussions with Wealden DC, Eastbourne BC/Lewes DC, ESCC and Highways England in scoping out how a transport assessment will be delivered for the benefit for all East Sussex local authorities in supporting respective Local Plans. This work is ongoing but will be developed into a project plan later in 2021.
Inclusion of Nature Recovery Networks in the list of strategic issues for the Local Plan	Nature Recovery Networks and Biodiversity Net Gain will be prominent in the Local Plan and has been added to the key issues and challenges section of this document. Joint work in partnership with the ESCC Ecologist/Sussex Local Nature Partnership will assist in delivering the policies required in Local Plan, including joint work on a proposed pilot Nature Recovery Network for Rother, Wealden and Eastbourne local authority areas.
RDC to seek inclusion/involvement in the AONB Officer Steering Group to explore methodologies for major development.	RDC has indicated that they wish to be involved in a group set up via the High Weald AONB Unit to discuss the best way to be involved in discussions regarding this important topic. It is appreciated that a different policy approach may be taken by local authorities on this matter and RDC may need to engage with other local planning authorities.
Ensure IDP is complementary/consistent with neighbouring planning authorities	The IDP will be developed concurrently with the Local Plan, engaging with neighbouring authorities at the relevant time. It is anticipated that initial engagement will be undertaken on consideration of the Council's development strategy and in advance of a formal Regulation 18 consultation stage.
Develop a Water Cycle Study in partnership with the EA and other organisations, to support the Local Plan	RDC will contact the EA and other partners later in 2021 with the view to develop a Water Cycle Study to support the development of spatial development options for the Local Plan.
Prepare Statements of Intent (if relevant) with neighbouring Planning authorities to support	RDC propose to continue discussions with neighbouring planning authorities through Duty to

Action Point	How and when will it be delivered?
consultation stages in the development of the Rother Local Plan	Cooperate meetings to discuss the relevant timeframes for producing a Statement of Intent. RDC envisage preparing Statement of Intents in advance of a more formal Statement of Common Ground to support its formal Regulation 18 consultation stage.
Continue joint working with the LLFA and Natural England on hydraulic modelling and SUDS policy direction/guidance in relation to the Pevensey Levels	Whilst initial meetings to discuss these projects have already taken place, RDC will continue to attend meetings to consider the impacts of this work on the Local Plan and how policy to support SUDS can be developed.

6. Next Steps

- 6.1 RDC is currently progressing its evidence base to assist in the development of spatial options for the Local Plan. The completion of the initial assessments of its HELAA and settlement study will be critical in providing a starting point for considering where development should be focused in line with the strategic views that were drawn out from the early engagement stage. RDC is prioritising this work to ensure that it can move forward to a Regulation 18 consultation stage later in 2021.
- 6.2 In line with the recommendations of the Council's Engagement Strategy it will not be prudent to undertake further wider external engagement until the Council has a strategic view of its spatial development options. However, it may be necessary for the Council to engage with specific organisations on the outcomes of the HELAA and specific site details. It is envisaged that this will take place as soon as sites have been initially assessed and the feedback of external organisations is required. This would include, for example, feedback from East Sussex County Council on the transport impacts on potential major development sites.
- 6.3 RDC will work internally with Members and key officers on emerging information from its evidence base, as well as formalising the Local Plan's draft vision, spatial objectives and cross-boundary issues that will need to be addressed.
- 6.4 The Council will continue with its proposed actions outlined within this document and its Engagement Strategy including its regular series of Duty to Cooperate meetings with neighbouring planning authorities. RDC has outlined its proposed timetable for the production of the Local Plan in its [Local Development Scheme](#) (March 2021), which ultimately seeks to ensure an adopted Local Plan before the end of 2023.

Appendices

Appendix A – Scoping of the Evidence Base to Support the Local Plan

The following table provides a list of the evidence base that is currently proposed for the new Local Plan. Additional evidence base documents may be undertaken by the Council as and when the need arises throughout the development of the Local Plan, and as such does not form an exhaustive list.

Evidence Document	Consultant/ Internal	Outcomes	Dependencies	Timeframe for Delivery of Output
Documents/Projects that are in Progress				
Housing and Employment Needs Assessment	GL Hearn consultants	<ul style="list-style-type: none">• Identified housing and employment need• Defined FEMA	<ul style="list-style-type: none">• Joint consideration by RDC/HBC• Accuracy of data• Sign off to timescales	<ul style="list-style-type: none">• Final Draft Report - Winter 2020• Likely requirement for Review later in 2021 to reflect changes to Economic Position caused by COVID-19 pandemic (to be confirmed)
Open and Playspace Audit/Assessment & Playing Pitch Strategy Update	Internal/ External	<ul style="list-style-type: none">• Designated open, amenity and playspaces• Quality and Quantity assessment• Review of playing pitch strategy• Take account of the Leisure Facilities Strategy (2015) and identify whether there is a strategic need for its review in liaison with Sport England	<ul style="list-style-type: none">• Require audit of sites• Information from GIS• Liaison with the Communities team regarding the Leisure Facilities Strategy Update	<ul style="list-style-type: none">• Play Pitch Strategy Update Commence work December 2019, Further work Spring/Summer 2020 and ongoing
SFRA	JBA Consulting	<ul style="list-style-type: none">• Level 1 SFRA - Identification of Flood Zone Areas, policy direction to safeguard development from flooding• Level 2 SFRA, if required	<ul style="list-style-type: none">• Information for GIS and support for information from the Council.	<ul style="list-style-type: none">• Project Commissioned• Draft Final Stage 1 - February 2021. Final Report to incorporate sites information Summer/Autumn 2021

Evidence Document	Consultant/ Internal	Outcomes	Dependencies	Timeframe for Delivery of Output
HELAA	Internal	<ul style="list-style-type: none"> Assessment of sites for their economic and housing potential Identification of available and deliverable sites 	<ul style="list-style-type: none"> Call for Sites Internal data on constraints, landscape, character of area 	<ul style="list-style-type: none"> Work commenced – long ongoing programme. Call for sites undertaken and completed in January 2021 Site Assessments Spring/Summer 2021
Windfall Assessment/Methodology	Internal	<ul style="list-style-type: none"> Assess the potential contribution windfall development can make to housing land supply Historical windfall rates Windfall methodology – assessed against identified sites to avoid double counting 	<ul style="list-style-type: none"> Historic completions data 	<ul style="list-style-type: none"> Commenced work Early 2020. Draft Report to be completed for internal purposes Will require amendment and reconsideration once the HELAA is progressed, resulting in potential change to the windfall definition.
Settlement Review Study (incorporating Services & Facilities Assessment and Settlement Constraints Study)	Internal	<ul style="list-style-type: none"> Understanding of the network of settlements, their built character and the opportunities for growth Understanding of sustainability of locations for development Infrastructure deficiencies Understanding of location and distribution of local services and community facilities Inform development boundaries review Understanding the impact of development on the AONB 	<ul style="list-style-type: none"> Data availability across the District Setting a framework for assessing sustainability Existing audit of sites Provision of new facilities Baseline information, links to Landscape Character 	<ul style="list-style-type: none"> Commenced work February 2020 Brief Completed Summer 2020 Analysis Starts Summer 2020 Engagement on facilities and services with Parish and Town Councils – end of Summer 2020 Production of Settle Review report – Spring/Summer 2021
SA/SEA Scoping	Internal	<ul style="list-style-type: none"> SA/SEA Scoping Assessment for consultation 	<ul style="list-style-type: none"> Baseline data Progression of local 	<ul style="list-style-type: none"> Work commenced November 2019. SA/SEA Scoping Report Consultation April-May 2020

Evidence Document	Consultant/ Internal	Outcomes	Dependencies	Timeframe for Delivery of Output
		<ul style="list-style-type: none"> • Consult specific consultation bodies • Consult selected non-statutory consultees 	plan to identify spatial objectives	<ul style="list-style-type: none"> • Consider to consultation responses and amendments to SA Scoping Report Summer/Autumn 2020 • Agree SA Framework with Hastings BC Winter 2021 • Sign off SA Scoping Report January 2021
Gypsy & Traveller Needs Study	External	<ul style="list-style-type: none"> • Assess the permanent & transit needs for Gypsy and Traveller provision in the District, in-conjunction with other East Sussex LPAs. 	<ul style="list-style-type: none"> • Baseline data 	<ul style="list-style-type: none"> • Commence work Early 2020 • Draft brief sent for comment to other LPAs – May 2020 • Comments collated, meeting to be arranged to discuss outstanding matters – July/August 2020 • Commission consultants – late Summer/Autumn 2020
Local Wildlife Site Review	Sussex Wildlife Site Initiative/ Sussex Wildlife Trust (SWT)	<ul style="list-style-type: none"> • Review of Priority Local Wildlife Sites for the District in line with a prepared Brief 	<ul style="list-style-type: none"> • Completed brief • Ability for SWT to undertake work to schedule and indicative cost 	<ul style="list-style-type: none"> • Brief Completed Summer 2020 • Commence preparatory work Autumn 2020 • Commission work – early 2021. SWT cannot commence the site visits until 2021 • Site Assessments commence – Spring 2021
Documents/Projects that are at early inception stage, can be progressed soon (or are follow on projects to those currently in progress)				
County-wide Transport Assessment	To commission to support development strategy options	<ul style="list-style-type: none"> • Specific highways capacity studies • Transport Assessment for growth proposed and impact on the transport network, key junctions • Will inform potential development 	<ul style="list-style-type: none"> • Early review of development strategy/options and proposed development numbers • Good working 	<ul style="list-style-type: none"> • Joint commission of County wide Transport Assessment – Late 2020/Early 2021 • Attendance at regular Transport Assessment meetings hosted by ESCC • Feed in development scenarios and proposed options after key evidence base is completed

Evidence Document	Consultant/ Internal	Outcomes	Dependencies	Timeframe for Delivery of Output
		<ul style="list-style-type: none"> options for the Council Will factor in proposed growth of neighbouring planning authorities and assess wide impact across the County. 	relationship and provision of data to consultants	in draft – Summer/Autumn 2021
Low Carbon/Renewable Energy Study	To commission – expertise required	<ul style="list-style-type: none"> Potential opportunities for renewal energy schemes Opportunities with major developments/allocations Actions/mitigation to steer policy in Local Plan 	<ul style="list-style-type: none"> Good working relationship and provision of data to consultants 	<ul style="list-style-type: none"> Prepare Brief and Commission – Summer/Autumn 2021 in-conjunction with Environment Services Team
Retail Needs Assessment	To commission – expertise required	<ul style="list-style-type: none"> Reviewed Retail Hierarchy Defined Shopping Areas – 1^o & 2^o frontage 	<ul style="list-style-type: none"> Information from GIS Information from previous retail studies 	<ul style="list-style-type: none"> Prepare Brief and Commission Summer/Autumn 2021
Density Study	Internal	<ul style="list-style-type: none"> An assessment of typical character areas within the District and their prevailing densities An assessment of appropriate densities for allocations, and windfall development in urban and rural locations 	<ul style="list-style-type: none"> Spatial studies could inform this work 	<ul style="list-style-type: none"> Requirement depends on emerging strategy proposed. The need for the study will be reviewed in Autumn 2021.
Review of Strategic Gaps and Development Boundaries	Internal	<ul style="list-style-type: none"> Production of a background paper to assess the designations and extent of strategic gaps and development boundaries 	<ul style="list-style-type: none"> HELLA, Environmental designations will inform decisions on amending boundaries 	<ul style="list-style-type: none"> Commence work Autumn 2020
Building Regulations	Internal	<ul style="list-style-type: none"> Review policy directions such as water efficiency and other Building Regulation 	<ul style="list-style-type: none"> Liaison with Building Control and 	<ul style="list-style-type: none"> Commence work Summer/Autumn 2021

Evidence Document	Consultant/ Internal	Outcomes	Dependencies	Timeframe for Delivery of Output
Considerations		requirements to be considered for the new Local Plan (subject to other BR consultations/changes)	understanding of Building Regulations	
Neighbourhood Plans Assessment	Internal	<ul style="list-style-type: none"> • An assessment of the impact of the adopted and emerging Neighbourhood Plans on the new Local Plan. Development of a Background Paper • Liaison with Parish and Town Council's on emerging Neighbourhood Plans 	<ul style="list-style-type: none"> • Status of Neighbourhood Plans 	<ul style="list-style-type: none"> • Neighbourhood Plan implications will be assessed throughout the production of the Local Plan • Production of Background Paper – Autumn 2021
Equalities Impact Assessment	Internal	<ul style="list-style-type: none"> • Undertaken an initial assessment to help guide equality matters in the Local Plan's development and produce a final report to 	<ul style="list-style-type: none"> • The Council's Equalities Strategy • Relationship to the SCI 	<ul style="list-style-type: none"> • Commence work Summer 2021
Landscape Character Assessment (with links to AONB Considerations)	To commission	<ul style="list-style-type: none"> • Assessment of the character of land and appropriate development guidance (links to the outcomes of the settlement studies). These could be commissioned on a settlement by settlement basis to fill in gaps or update the landscape character evidence base. 	<ul style="list-style-type: none"> • Good working relationship and provision of data to consultants • Needs to be informed by the direction of development in the AONB 	<ul style="list-style-type: none"> • Prepare briefs and commission after completion of HELAA – Summer 2021 onwards
Infrastructure Delivery Plan Update	Internal	<ul style="list-style-type: none"> • Refresh of infrastructure needs to support development identified in the emerging Local Plan • Consultation and engagement with infrastructure providers. • Will inform potential development 	<ul style="list-style-type: none"> • Early review of development strategy/options and proposed development numbers • Infrastructure constraints to future 	<ul style="list-style-type: none"> • Commence work Summer 2021 • Further develop IDP after Regulation 18 consultation

Evidence Document	Consultant/ Internal	Outcomes	Dependencies	Timeframe for Delivery of Output
		options for the Council	development	
Habitats Regulation Screening	Internal	<ul style="list-style-type: none"> • HRA Screening Report • Initial impact on SAC's to identify if AA required 	<ul style="list-style-type: none"> • Baseline data • Conservation objectives • Information on other Local authority plans 	<ul style="list-style-type: none"> • Work commenced December 2019. • Further work anticipated Autumn 2020 after the consideration of draft development options.
Documents/Projects that cannot progress until development options/locations have been proposed for further assessment				
SA/SEA Full Report	Internal	<ul style="list-style-type: none"> • Full assessment of policies/options against SA framework 	<ul style="list-style-type: none"> • Develop and refine development options and strategies 	<ul style="list-style-type: none"> • Ongoing through Local Plan timeframe. • SA Scoping Report published at Regulation 18 consultation stage • SA/SEA full report on submission of the Local Plan
HRA Appropriate Assessment	To commission	<ul style="list-style-type: none"> • Completion of HRA report in support of the Local Plan – including AA 	<ul style="list-style-type: none"> • Working collaboratively with English Nature and Neighbouring Authorities 	<ul style="list-style-type: none"> • Commission Autumn 2021
Duty To Cooperate Statement	Internal	<ul style="list-style-type: none"> • Summary of all Duty to Cooperate activities that the Council have undertaken and how this has helped shape the Local Plan • Published Statements of Common Ground 	<ul style="list-style-type: none"> • Duty to Cooperate log, early engagement strategy • Duty to Cooperate Action Plan 	<ul style="list-style-type: none"> • Compile late 2021 and onwards, • Ongoing Log to be kept
Viability Assessment of the Local Plan	To commission	<ul style="list-style-type: none"> • Test that the development proposed is viable and therefore deliverable • Viability testing may be required early 	<ul style="list-style-type: none"> • Baseline information • Working effectively 	<ul style="list-style-type: none"> • Early viability testing Autumn/Winter 2021 • Commence full work Early 2022

Evidence Document	Consultant/ Internal	Outcomes	Dependencies	Timeframe for Delivery of Output
		on at the development options stage	with consultants	

Appendix B - List of Respondents to the Targeted Early Engagement Stage of the Rother Local Plan

RDC Members	Town/Parish Councils	NP Steering Groups	Targeted Local organisations	Additional Responses*	Targeted Organisations for DtC
Cllr John Barnes	Brede PC	Crowhurst	Bexhill Chamber of Commerce	1066 cycle club	Hastings BC
Cllr Mary Barnes	Brightling PC		Bexhill Heritage	Bexhill Wheelers	Wealden DC
Cllr Graham Browne	Burwash PC		Rother	CPRE	Folkestone & Hythe DC
Cllr Vikki Cook	Catsfield PC		Environmental Group	Darwell Area Conservation Society	Ashford BC
Cllr Sarah Errington	Crowhurst PC			Andrew Elridge - Guestling Cllr	Tunbridge Wells BC
Cllr Kathryn Field	Dallington PC			Sallie Cox - Guestling Cllr	Eastbourne BC & Lewes DC
Cllr Polly Gray	Etchingham PC				East Sussex County Council
Cllr Eleanor Kirby-Green	Ewhurst PC				Natural England
Cllr Lynn Langlands	Fairlight PC				Sussex Wildlife Trust
Cllr Andrew Mier	Guestling PC				Historic England
Cllr Doug Oliver	Hurst Green PC				Highways England
Cllr Susan Prochak	Icklesham PC				Environment Agency
Cllr Hazel Timpe	Mountfield PC				Southern Water
Cllr Jonathan Vine-Hall	Peasmarsh PC				High Weald AONB Unit
	Pett Parish PC				Lead Local Flood Authority
	Rye TC				NHS CCG
	Salehurst & Robertsbridge PC				Pevensey and Cuckmere Water Level Management Board
	Sedlescombe PC				
	Whatlington PC				

*These organisations submitted responses but were not formally emailed regarding the targeted early engagement

Glossary of Terms

AONB	Area of Outstanding Natural Beauty
DtC	Duty to Cooperate
DWMP	Drainage and Wastewater Management Plan
FEMA	Functional Economic Market Assessment
G&T	Gypsy and Traveller
GTAA	Gypsy and Traveller Accommodation Assessment
HEDNA	Housing and Economic Development Needs Assessment
HELAA	Housing and Economic Land Availability Assessment
HMA	Housing Market Area
IDP	Infrastructure Delivery Plan
LDS	Local Development Scheme
MOU	Memorandum of Understanding
SA/SEA	Sustainability Appraisal/Strategic Environmental Assessment
SAC	Special Area of Conservation
SARMS	Strategic Access and Recreational Management Strategy
SoCG	Statement of Common Ground
Sol	Statement of Intent
SPA	Special Protection Area
SRN	Strategic Road Network