



**Sussex**  
Wildlife Trust

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## Rother DC Targeted Early Engagement on the Local Plan

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Thank you for consulting the Sussex Wildlife Trust (SWT) on your early engagement documents. We have only commented on the Early Engagement Document Questions (1-4 and 11), as the others seemed more appropriate for other local authorities.

### Early Engagement on the Local Plan

#### **1. Do you have any comments on the Council's general approach it is taking to its early stage development of the Rother Local Plan?**

SWT is very pleased by the recognition from RDC of the climate emergency (paragraph 2.1). This recognition needs to be embedded in both policy and the approach to delivery of development within the district.

It is not completely clear to SWT which of the processes set out in the Early Engagement Document (EED) have started, which are ongoing and which are complete. For example, we would have liked to comment on the SA/SEA scoping report mentioned in paragraph 3.2. However, Figure 2 indicates that the consultation already happened in April/May this year and paragraph 4.4 says it is already completed.

We also have concerns that the SA scoping report comes in Stage 1, but assessing the plan's evidence base is delayed to Stage 2. Although again, it is not clear if these are happening concurrently. Regardless of this, given the recognition of the climate emergency, the environmental evidence base for the plan, and particularly progress towards identifying a Nature Recovery Network for Rother District should be prioritised. This would help to identify environmental opportunities at the earliest stage and particularly the capacity of the existing natural capital assets to absorb further development.

#### **2. Do you have any comments on both documents (Early Engagement Document and Duty to Cooperate Action Plan) in relation to the identified stages in which you will be involved in helping shape the Rother Local Plan?**

The identification and delivery of a Nature Recovery Network (NRN) should be listed as a key strategic issue which the Local Plan will need to embed into policy and consultation (Figure 4). 'Environmental Protection' is not sufficient. There must be a specific commitment to enhancing biodiversity and the requirement to deliver net gains.

We also expect to see commitment to delivering a NRN as part of the visioning process. This would require clear environmental evidence to be assessed as potential site allocations come forward.

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Similarly there needs to be much more progressive language than 'conserving environmental quality' as listed under Key Issues and Challenges. RDC should be committing to nature's recovery through protection and enhancement.

We support the assessment of capacity and sustainability of settlements through the evidence base under Policy Options for Growth. This should include environmental capacity and the ability of natural capital assets to sustain development and the people who will live/work there.

We note that there is joint working between RDC and Hastings Borough Council (HBC) on Infrastructure Deliver Plans. We commend this and see this as a key mechanism for considering cross boundary green infrastructure improvements. We note that Lewes DC is currently holding a call for sites to inform their Land Availability Assessment and whilst they are inviting submissions for housing and employment space, they are also asking for sites with potential to deliver green infrastructure. This is something RDC could also consider.

We note that the first consultation report is anticipated to be called the 'preferred strategy and alternatives' (paragraph 4.3 part 8). We support an early consultation on options, however if this draft does not contain policies and specific policy wording options, then there should be another consultation on the draft plan before the submission plan phase. Otherwise, there is a risk that the plan will go forward with major issues as the Wealden Local Plan did in 2019.

**3. Is there any specific work being undertaken by your or other organisations that will need to be considered and fed into the new Local Plan?**

Sussex LNP Natural capital investment strategy.  
NE nature recovery network tool kit

**4. Are there any specific planning issues you wish to raise with Rother District Council at this time?**

Especially given the potential huge jump in housing numbers due to the proposed changes to the standard method, there needs to be a comprehensive environmental evidence base produced at the earliest stage of plan making. This evidence must be used to inform the development strategy, not retrofitted at a later date. Failure to do this may lead to delays, missed opportunities for contributing to nature's recovery and climate mitigation and damage to natural capital assets.

Other Comments

**11. Do you have any additional comments that will assist the Council in preparing its Local Plan at this early stage?**

Appendix A of the EED:

We note that Sussex Wildlife Trust is listed under the Local Wildlife Site Review in 'Documents/Projects that can be progressed soon (or are follow on projects to those currently in progress)'. It should be noted that this work is being delivered by the Sussex Local Wildlife Site Initiative - <https://lws-sussex.org.uk/>, not the Sussex Wildlife Trust. The Initiative is supported by a broad partnership of organisations, working under the umbrella of the Sussex Local Nature Partnership. Whilst the Initiative is hosted by the Sussex Wildlife Trust, the Local Wildlife Sites survey programme is delivered by the Sussex Local Wildlife Sites Officer, Dan Watkins, who is based at Sussex Biodiversity Record Centre.

This is also the case in the Duty to Cooperate document and should be amended.

The Settlements Constraints Study should aim to understand the impact of development on biodiversity and wider natural capital.

SWT welcomes the opportunity to work proactively with the council and help them to ensure that future development promotes nature's recovery.

Yours sincerely

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