

Public Document Pack

Rother District Council



Cabinet

Date and Time - **Monday 4 October 2021 – 6:30 pm**

Venue - **Council Chamber, Town Hall, Bexhill-on-Sea**

Councillors appointed to the Committee:

Councillor D.B. Oliver (Leader), S.M. Prochak, MBE (Deputy Leader), C.A. Bayliss, T.J.C. Byrne, K.P. Dixon, K.M. Field, H.L. Timpe and J. Vine-Hall

AGENDA

1. MINUTES

To authorise the Leader to sign the Minutes of the meeting held on Monday 6 September 2021 as a correct record of the proceedings.

2. APOLOGIES FOR ABSENCE

3. ADDITIONAL AGENDA ITEMS

To consider such other items as the Leader decides are urgent and due notice of which has been given to the Head of Paid Service by 9:00am on the day of the meeting.

4. URGENT DECISIONS

The Leader to give details of those reports that have been referred to the Chairman of the Council to consider designating as urgent, in accordance with Rule 17 of the Overview and Scrutiny Procedure Rules contained within Part 4 of the Council Constitution, and to which the call-in procedure will not therefore apply.

5. DISCLOSURE OF INTERESTS

To receive any disclosure by Members of personal and disclosable pecuniary interests in matters on the agenda, the nature of any interest and whether the Member regards the personal interest as prejudicial under the terms of the Code of Conduct. Members are reminded of the need to repeat their declaration immediately prior to the commencement of the item in question.

At the discretion of the Leader, the order of the items set out in the agenda may be varied

This agenda can be made available in large print, Braille, audiotape/CD or in another language upon request. For all enquiries please contact Lisa Cooper

**Rother District Council aspiring to deliver...
an Efficient, Flexible and Effective Council, Sustainable Economic Prosperity,
Stronger, Safer Communities and a Quality Physical Environment**

6. **REVENUE BUDGET AND CAPITAL PROGRAMME MONITORING QUARTER 1 - 2021/22** (Pages 1 - 10)
7. **FINANCIAL STABILITY PROGRAMME - PROGRESS REPORT** (Pages 11 - 14)
8. **UPDATED STATEMENT OF COMMUNITY INVOLVEMENT** (Pages 15 - 82)
9. **BATTLE CIVIL PARISH NEIGHBOURHOOD PLAN 2019-2028** (Pages 83 - 86)
10. **RESULTS OF CUSTOMER SURVEY** (Pages 87 - 100)
11. **AFGHAN RESETTLEMENT UPDATE** (Pages 101 - 106)

Malcolm Johnston
Chief Executive

Agenda Despatch Date: 24 September 2021

Rother District Council

Report to: Cabinet

Date: 4 October 2021

Title: Revenue Budget and Capital Programme Monitoring Quarter 1 - 2021/22

Report of: Antony Baden – Finance Manager

Cabinet Member: Councillor Kevin Dixon

Ward(s): All

Purpose of Report: To consider the recommendations arising from the Overview and Scrutiny Committee meeting held on 13 September 2021, regarding the forecast for the financial year ending the 31 March 2022. The report and recommendations arising are reproduced below and the Minutes of that meeting (Appendix D) should be read in conjunction with this report.

Decision Type: Non-Key

Officer

Recommendation(s): It be **RESOLVED**: That the:

- 1) report be noted; and
- 2) grant offer of £391,050 from the Ministry of Housing, Communities and Local Government to support the purchase of further accommodation units as part of the East Sussex Rough Sleeper Initiative, be approved.

Introduction

1. This report updates Members on the Council's finances as at the 30 June 2021 and projects a provisional outturn for 2021/22. The Revenue Budget and Capital Programme positions are summarised in Appendices A and B, respectively. The impact of the forecast on the Council's reserves is summarised in Appendix C. The report also includes a brief update on the Collection Fund performance.
2. Since the detailed budget was approved by Cabinet on the 8 February 2021 there has been one reportable virement, which is reflected in Appendix A. Staff turnover of £288,000, which was originally budgeted centrally has now been consolidated into departmental salary budgets.

Revenue Budget

3. The Revenue Budget forecast as at 30 June 2021 indicates a deficit of £144,000 against the approved budget drawdown from Reserves of £2.7m. The position is summarised in Appendix A and the main variances are

explained in paragraphs 4 to 11. Other smaller overspends have also been identified, which Heads of Service will need to manage within their existing budgets.

Strategy and Planning – Deficit £570,000

4. The forecast includes a potential liability of £300,000 in relation to the cost of planning Appeals at Strand Meadow, Burwash and Pett Level Road.
5. The department continues to experience a backlog of work primarily caused by difficulties in recruiting to vacant posts. This has necessitated the procurement of temporary support from Capita Business Services at a cost of £270,000. However, this is the maximum expected cost and it is hoped that it may be partially offset by the generation of additional planning fee income against the budget of £700,000.

Acquisitions, Transformation & Regeneration – Deficit £50,000

6. The deficit is due to the delayed drawdown of the £50,000 grant by the Sussex Wildlife Trust in 2020 for the development of the community wildlife garden at Rye Harbour, which was originally scheduled to be paid in the last financial year.

Housing, Community & Neighbourhood Services – Deficit £55,000

7. The recent lockdown has resulted in a forecast shortfall of £70,000 in car parking income although additional income of £15,000 from concessions should reduce the impact.

Net Financing Costs – Surplus £688,000

8. As previously reported Members will be aware that the pace of the Council's capital investment programme has slowed dramatically due to the ongoing impact of the pandemic. It is expected that the programme will gather pace during the 2021/22 but in the short term a significant reduction of £688,000 is forecast in relation to external interest and the minimum revenue provision charge to repay loan debt.

Financial Stability Programme – Deficit £474,000

9. The pandemic has also had a negative impact on the Council's ability to deliver savings and efficiencies as part of its Financial Stability Programme, (FSP). A shortfall of £474,000 is forecast against the 2021/22 target.
10. Officers have made significant progress in working up proposals to meet the FSP targets and these will be discussed with Members at the FSP Board meeting in September 2021.

Income – Surplus £317,000

11. Since the budget was approved, the Council has received further additional grant funding from the Ministry of Housing, Communities and Local Government MHCLG. No further allocations are anticipated at this stage.

Capital Programme

12. The Capital Programme forecast as at 30 June 2021 has increased by £1m against the approved budget. The position is summarised in Appendix B and the main changes are explained in paragraphs 13 to 15 below.
13. The biggest change since the capital programme was approved in February 2021 is the North East Bexhill Office Development scheme, which has been removed from the programme due to the high degree of uncertainty surrounding it. This has reduced the estimated outturn by £15.737m.
14. On the 29 March 2021, Cabinet approved a further funding (Minute CB20/119 refers) for the purchase of Temporary Accommodation to house homeless families on a temporary basis. This was in addition to the £3m approved in September 2019 and increased forecast expenditure in 2021/22 by £6m.
15. As reported throughout 2020/21, the Council's Capital Programme was severely impacted by the pandemic and this has resulted in several schemes slipping into 2021/22. The amount of slippage is approximately £9.151m, and the largest schemes affected are as follows:
 - a. Property Investment Strategy schemes - £1.193m
 - b. Housing Development schemes - £3.958m
 - c. Temporary Accommodation purchases (original allocation) - £1.300m
 - d. Land Swap (former High School site) - £1.085m
16. The Council has been successful in securing additional grant funding from the MHCLG and Homes England to support its existing Housing First (HF) Project as part of the wider East Sussex Rough Sleeper Initiative (RSI). The grant award is for £391,050 and will support the purchase of a further four units of HF accommodation to add to the four existing units already in operation, further reducing the cost to the Council of temporary accommodation. The remainder of the capital funding (approximately £320,000) will be secured from the £6m approved for the purchase of temporary accommodation (Minute CB20/119 refers). The capital grant is supported by a total revenue grant allocation of £84,000, covering the period 2021/22 and 2023/24, to fund the RSI Housing First workers who will support the former rough sleepers living in the accommodation.

Impact on Reserves

17. The forecast impact on Reserves is a reduction of £4.282m against the planned use of £3.319m. This is an increase of £963,000.
18. The amount of Reserves required to balance the budget is forecast to increase by £144,000 and has been explained in paragraphs 3 to 12.
19. As referred to in paragraph 16 several capital schemes originally planned to be funded from revenue reserves in 2020/21 have slipped into 2021/22. The additional drawdown is £819,000 and is shown in Appendices B and C.

Collection Fund

20. The collection rate at the end of Quarter 1 for the Council Tax part of the Collection Fund was 29.92% of the collectable debit, which is 1.46% higher than the corresponding figures in 2020/21. Collection performance is shown below:

	2021/2022	Equivalent Period 2020/2021
Income Received	£82,203,282.90	£78,092,103.06
Income Received as a % of collectable debit	29.92%	28.46%

21. The collection rate at the end of Quarter 1 for the Business Rates part of the Collection Fund was 33.61% of the collectable debit, which is 0.91% lower than the corresponding figure in 2019/20. Collection performance is shown below:

	2021/2022	Equivalent Period 2020/2021
Collectable debit	£9,931,205.66	£8,245,788.67
Income Received	£3,337,563.92	£2,695,997.69
Income Received as a % of collectable debit	33.61%	32.70%
Amount outstanding for year	£6,593,641.74	£5,549,790.98

Conclusion

22. The revenue forecast for Quarter 1 2021/22 is a deficit of £2.844m, which is £144,000 greater than the approved planned use of Reserves. The Assistant Director, Resources and Finance Manager will work closely with Heads of Services and Members to reduce the overspend and its impact on reserves.
23. The Council's Capital Programme is forecast to increase by £1m but this will be managed so that any impact on reserves and/or the Revenue Budget will be mitigated.

Other Implications	Applies?	Other Implications	Applies?
Human Rights	No	Equalities and Diversity	No
Crime and Disorder	No	External Consultation	No
Environmental	No	Access to Information	No
Risk Management	No	Exempt from publication	No

Chief Executive	Malcolm Johnston
Report Contact Officer:	Antony Baden
e-mail address:	Antony.Baden@rother.gov.uk
Appendices:	Appendix A Revenue Budget Forecast Appendix B Capital Programme Forecast Appendix C Reserves
Relevant Previous Minutes:	CB20/119
Background Papers:	None.
Reference Documents:	None.

Revenue Budget 2021/22 Forecast as at the 30 June 2021

Line	Rother District Council General Fund Summary	Draft 2020/21 Actual £ (000)	Revised 2021/22 Budget £ (000)	2021/22 Estimated Outturn £ (000)	2021/22 Quarter 1 Variance £ (000)
1	Corporate Core	2,117	1,998	1,998	0
2	Environmental Services	507	609	609	0
3	Strategy and Planning	1,030	1,043	1,613	570
4	Acquisitions, Transformation and Regeneration	(392)	(329)	(279)	50
5	Housing, Community & Neighbourhood Services	9,539	8,672	8,727	55
6	Resources	4,256	3,293	3,293	0
7	Total Cost of Services	17,057	15,286	15,961	675
8	Net Financing Costs	118	1,101	412	(688)
9	Salaries turnover	0	0	0	0
10	Financial Stability Programme - savings/cost reductions	0	(632)	(158)	474
11	Net Cost of Services	17,175	15,755	16,215	461
	Income				
12	Special Expenses	(687)	(692)	(692)	(0)
13	Net Business Rates & Section 31 Grants	(4,142)	(3,747)	(3,747)	0
14	Non-Specific Revenue Grants	(3,194)	(1,653)	(1,970)	(317)
15	Council Tax Requirement (Rother only)	(7,019)	(7,097)	(7,097)	(0)
	Other Financing				
16	Collection Fund (Surplus)/Deficit	(849)	134	134	(0)
17	Total Income	(15,891)	(13,054)	(13,371)	(317)
18	Contribution from Reserves/Funding Gap	1,284	2,700	2,844	144

Capital Programme 2021/22 Forecast as at the 30 June 2021

	Actual to 30th June 2021 £ (000)	2021/22 Original Budget £ (000)	2021/22 Estimated Outturn £ (000)	2021/22 Quarter 1 Variance £ (000)
Acquisitions, Transformation and Regeneration				
Other Schemes				
Community Grants	22	130	130	0
Cemetery Entrance	63		172	(172)
Rother Transformation ICT Investment			384	(384)
Corporate Document Image Processing System			435	(435)
1066 Pathways			66	(66)
Ravenside Roundabout			200	(200)
Development of Town Hall Bexhill			460	(460)
Property Investment Strategy				
Office Development NE Bexhill		15,737		15,737
Mount View Street Development - Public/Commercial			964	(964)
PIS - Beeching Road/Wainwright Road		900	963	(63)
PIS - Barnhorn Road	78	3,345	3,402	(57)
PIS - Beeching Road 18-40	103	392	501	(109)
PIS - 35 Beeching Road			220	(220)
Housing Development Schemes				
Community Led Housing Schemes		303	600	(297)
Blackfriars Housing Development	941	10,350	11,128	(778)
Mount View Street Development - Housing		3,657	6,940	(3,283)
Alliance Homes (Rother) Ltd		25,000	25,000	0
Alliance Homes share capital			100	(100)
King Offa Residential Development	17			0
Former Bexhill High School site - Housing				0
Housing and Community Services				
De La Warr Pavilion - Capital Grant	28	54	54	0
Sidley Sports and Recreation	2	811	809	2
Land Swap re Former High School Site			1,085	(1,085)
Bexhill Leisure Centre - site development				0
Bexhill Leisure Centre - refurbishment		140	140	0
Disabled Facilities Grant	262	1,625	1,625	0
New bins		125	125	0
Bexhill Promenade - Outflow pipe			100	(100)
Bexhill Promenade - Protective Barriers	20		47	(47)
Fairlight Coastal Protection				0
Housing (purchases - temp accomodation)			7,708	(7,708)
Strategy & Planning				
Grants to Parishes - CIL	40		88	(88)
Executive Directors & Corporate Core				
Accommodation Strategy	0		0	0
Resources				
ICT Infrastructure – Ongoing Upgrade Programme	2		123	(123)
Development of Council Owned Sites	4			0
Total Capital Programme	1,583	62,569	63,569	(1,000)

	Actual to 30th June 2021 £ (000)	2021/22 Original Budget £ (000)	2021/22 Estimated Outturn £ (000)	2021/22 Quarter 1 Variance £ (000)
Funded By:				
Capital Receipts		0	1,485	(1,485)
Grants and contributions		12,993	14,201	(1,208)
CIL		193	281	(88)
Borrowing		23,764	21,164	2,600
Capital Expenditure Charged to Revenue		619	1,438	(819)
Unfunded		25,000	25,000	0
Total Funding	0	62,569	63,569	(1,000)

Reserves

	Draft 2020/21 Actual £ (000)	Revised 2021/22 Budget £ (000)	2021/22 Estimated Outturn £ (000)	2021/22 Quarter 1 Variance £ (000)
Revenue Reserves and General Fund Balance - Opening Balance	(14,970)	(13,209)	(13,209)	0
Use of Reserves to Fund Capital Expenditure	477	619	1,438	819
Use of Reserves to Balance Budget incl deficit	1,284	2,700	2,844	144
Closing Balance	(13,209)	(9,890)	(8,927)	963

Minutes of the Overview and Scrutiny Meeting – 13 September 2021**OSC21/20. REVENUE BUDGET AND CAPITAL PROGRAMME MONITORING
(6) QUARTER 1 – 2021/22**

Members received and considered the report of the Finance Manager on the Revenue Budget and Capital Programme Monitoring Quarter 1 2021/22. The report contained details of the significant variations of the Revenue Budget and updated Capital Programme.

Since the detailed budget had been approved by Cabinet in February 2021, there had been one reportable virement. Staff turnover of £288,000 was originally budgeted centrally but had since been consolidated into departmental salary budgets.

The revenue forecast showed a deficit of £144,000, against the approved budget drawdown from Reserves of £2.7m. The main reasons for the variations were detailed in the report, which included planning appeal costs, the procurement of support from Capita for the Planning department, the delayed drawdown of the £50,000 grant by the Sussex Wildlife Trust for the development of the community wildlife garden at Rye Harbour, a forecast shortfall in car parking income resulting from the recent lockdown and a shortfall of £474,000 in the Financial Stability Programme's savings target.

Since the budget was approved, the Council had received further additional grant funding of £317,000 from the Ministry of Housing, Communities and Local Government (MHCLG) to offset partially the over spends and the slowing of the Council's capital investment programme due to the ongoing impact of the pandemic is forecast to reduce financing costs by £688,000.

The Capital Programme forecast as at 30 June 2021 had increased by £1m against the approved budget; the position was summarised in Appendix B to the report. The biggest change since the Capital Programme had been approved in February 2021 was the North East Bexhill Office Development scheme, which had been removed from the programme due to the high degree of uncertainty surrounding it. This had reduced the estimated outturn by £15.737m. Other changes included an approved increase of £6 million to fund the purchase of further Temporary Accommodation units and scheme slippage from 2020/21 totalling about £9 million.

The Council had been successful in securing additional grant funding from the MHCLG and Homes England to support its existing Housing First (HF) Project as part of the wider East Sussex Rough Sleeper Initiative (RSI). The grant award was for £391,050 and would support the purchase of a further four units of HF accommodation to add to the four existing units already in operation, further reducing the cost to the Council of temporary accommodation. The remainder of the capital funding (approximately £320,000) would be secured from the £6m approved for the purchase of temporary accommodation. The capital

grant was supported by a total revenue grant allocation of £84,000, covering the period 2021/22 and 2023/24, to fund the RSI Housing First workers who would support the former rough sleepers living in the accommodation.

The forecast impact on Reserves was a reduction of £4.282m against the planned use of £3.319m, an increase of £963,000. The amount of Reserves required to balance the revenue budget was forecast to increase by £144,000. Several capital schemes originally planned to be funded from revenue reserves in 2020/21 had slipped into 2021/22; the additional drawdown was £819,000 and was shown in Appendices B and C to the report.

The collection rate at the end of Quarter 1 for the Council Tax part of the Collection Fund was 29.92% of the collectable debit, which was 1.46% higher than the corresponding figures in 2020/21.

The collection rate at the end of Quarter 1 for the Business Rates part of the Collection Fund was 33.61% of the collectable debit, which was 0.91% lower than the corresponding figure in 2019/20.

The Assistant Director, Resources and the Finance Manager would work closely with Heads of Services and Members to reduce the forecast overspend and its impact on reserves.

RESOLVED: That:

- 1) the report be noted; and
- 2) Cabinet be recommended to approve a grant offer of £391,050 from the Ministry of Housing, Communities and Local Government to support the purchase of further accommodation units as part of the East Sussex Rough Sleeper Initiative.

(Overview and Scrutiny Committee Agenda Item 6).

This page is intentionally left blank

Rother District Council

Report to:	Cabinet
Date:	4 October 2021
Title:	Financial Stability Programme – Progress Report
Report of:	Antony Baden – Finance Manager
Cabinet Member:	Councillor Kevin Dixon
Ward(s):	All
Purpose of Report:	To note the progress of the Financial Stability Programme and updated timetable.
Decision Type:	Non-Key
Officer Recommendation(s):	It be RESOLVED : That the report be noted.
Reasons for Recommendations:	To update Members on the progress of the Financial Stability Programme.

Introduction

1. This report updates Members on the progress of the Financial Stability Programme (FSP) adopted by the Council in March 2021 under the direction of the FSP Board. Members will recall the programme sets out how the Council might achieve the savings and income targets in the Council's Medium Term Financial Plan (MTFP) and ultimately deliver on the ambition to achieve financial stability as set out in the Corporate Plan.

Progress to date

2. Since April 2021, Heads of Service have been developing ideas in line with the key themes of invest to save, income generation and service prioritisation. This work has identified a significant number of suggestions which, following a meeting of the Programme Board on the 16 September will now be worked up into detailed proposals together, where necessary, with project and resource plans. A number of small proposals can be commenced straight away which is expected to deliver some savings in this financial year. However, it is likely that the majority of proposals will start to be delivered from 2022/23.
3. The following gives Members an idea of the scope of ideas being considered:
 - a. Online electronic billing to reduce stationery and postage costs
 - b. Use of artificial intelligence to automate processing of customer applications
 - c. Introduction of new fees and charges
 - d. Income through advertising and sponsorship

- e. Increased insourcing of estate maintenance to reduce costs
 - f. Selling spare capacity of services such as print and estate maintenance teams
4. Proposals centred on service prioritisation will need to be considered in conjunction with phase 2 of the Council staffing restructure. The MTFP places significant reliance on the Council's strategy of protecting discretionary services whereby town and parish councils work with us to ensure the continuation of discreet services. Discussions are very much in their embryonic stage but it is expected that a clearer position can be achieved by the end of this financial year.

Resources

5. From the work so far, it is clear that the savings/income targets for 2021/22 will not be achieved and this has been reported in the Quarter 1 monitoring report to Overview & Scrutiny Committee and this Cabinet. This will increase the use of reserves for this financial year.
6. To deliver the proposals will require an increase in the staffing capacity of the Council. This was envisaged in the original programme and can be accommodated within the £750,000 earmarked reserve approved by Council. An initial appointment will be made shortly for an officer to focus on the income generation proposals and support the discussions with town and parish councils.

Timetable

7. An updated timetable is shown at Appendix A. It should be remembered that this reflects the first phase of the programme. The programme is expected to be reiterative as new ideas and proposals come forward and will mirror the five-year MTFP.

Conclusion

8. Good progress has been made in identifying proposals to help reduce the Council's financial gap between its income and expenditure. The coming six months will be critical in ensuring that these proposals start to be delivered and the savings or income realised.

Environmental Implications

9. In assessing the proposals coming forward, it is necessary to consider their environmental impact. Some proposals in themselves will have a positive impact on the Council's carbon footprint.

Other Implications	Applies?	Other Implications	Applies?
Human Rights	No	Equalities and Diversity	No
Crime and Disorder	No	External Consultation	No
Environmental	Yes	Access to Information	No
Risk Management	No	Exempt from publication	No

Chief Executive Malcolm Johnston

Report Contact Antony Baden

Officer:

e-mail address:	Antony.Baden@rother.gov.uk
Appendices:	Appendix A Timetable
Relevant Previous Minutes:	None.
Background Papers:	None.
Reference Documents:	None.

Financial Stability Programme Timetable

Revised 8/9/21

Ref	Activity	Start	Finish
1	Budget Analysis including statutory/discretionary	30/11/2020	10/12/2020
2	Member discussion	10/12/2020	10/12/2020
3	Draft Budget Report – January Cabinet	11/01/2021	11/01/2021
4	FSPB Paper	01/02/2021	28/02/2021
5	FSPB meeting	12/03/2021	12/03/2021
5	Member discussion at Cabinet Briefing	15/03/2021	15/03/2021
6	Cabinet receives proposals report	29/03/2021	29/03/2021
7	Full Council approval – incl invest to save fund	17/05/2021	17/05/2021
8	Service Reviews undertaken	01/04/2021	31/08/2021
9	Progress Report 1 and proposals to Board	16/09/2021	16/09/2021
10	Report to Cabinet – Mid-year progress update	04/10/2021	04/10/2021
11	Progress Report 2 and proposals to Board	13/12/2021	13/12/2021
12	Progress Report 3 and proposals to Board	14/02/2022	17/02/2022
13	Progress Report 4 and proposals to Board	11/04/2022	11/04/2022
14	Report to Cabinet - End of year progress update	02/05/2022	02/05/2022

Rother District Council

Report to:	Cabinet
Date:	4 October 2021
Title:	Updated Statement of Community Involvement
Report of:	Ben Hook
Cabinet Member:	Councillor Jonathan Vine-Hall
Ward(s):	All
Purpose of Report:	To approve the draft Statement of Community Involvement 2021 for adoption at full Council
Decision Type:	Non-Key
Officer	
Recommendation(s):	Recommendation to COUNCIL: That the updated Statement of Community Involvement attached as Appendix A be approved and adopted, with any comments being reported verbally to full Council.
Reasons for Recommendations:	The risk of not updating the SCI is that future consultations may be deemed not to comply with recent updates to planning legislation particularly in relation to the Duty to Co-operate.

Introduction

1. This report presents a draft updated 'Statement of Community Involvement' (SCI), attached as Appendix A, which sets out how and when the Council will carry out consultations and involve the community in both the preparation of planning policy documents and in the determination of planning applications. The updated SCI is put forward for formal adoption by the Council following a six-week public consultation which took place between 11 June – 23 July 2021.
2. Following this period of public consultation, the draft updated SCI has been the subject of a small number of minor amendments since it was last presented to Cabinet on 24 May where it was approved for public consultation. These amendments are set out in the Consultation Summary Report, attached as Appendix B.
3. None of the amendments made as a result of the public consultation have changed the substance of the draft updated SCI. In view of this, the description

of the draft updated SCI presented to Cabinet 24 May is still relevant, and is set out below, except for explanation in paragraph 11 of other recent minor changes to the draft document not related to the public consultation but which have been made to reflect ongoing improvements to our engagement processes.

Context of the update

4. While the existing SCI, adopted in 2018, continues to meet most statutory requirements in terms of plan-making, there is now a greater focus on early engagement. The changes relating to the closure of the Rye Community Help-Point (where planning policy documents would typically be made available for public viewing) will have an impact on how documents can be made publicly available.
5. It is considered timely to update the SCI, in advance of any statutory consultation on the forthcoming new Local Plan. The consultation timeframe is set out in the current Local Development Scheme (March 2021). It should be noted that in any event, Regulation 10A (1) (b) of The Town and Country Planning (Local Planning) (England) (Amendments) Regulations 2017 now requires Councils to review SCIs at least every 5 years.
6. The review also provides the opportunity to bring the SCI up-to-date in its coverage of the recent changes to public speaking at meetings of the Planning Committee, as well as other recent minor changes within the Planning Service.
7. It is pointed out that the SCI deals only with planning processes. It does not deal with planning policy but sets out how the Council will involve different sectors of the community, from individual members of the public through to representative organisations, in preparing plans that do address such matters, as well as in considering planning applications.

Analysis / Details of the proposals

a) Early engagement on plan-making and the Duty to Do-operate

8. The approach to pre-production and early engagement on the Local Plan is set out within Section 3 of the SCI. Table A sets out how early engagement will be undertaken, setting out the statutory requirements and where the District Council will carry out informal engagement. This is more detailed than the previous SCI and indicates how the District Council will engage with stakeholders and the public, where appropriate.

b) Public speaking at Planning Committee

9. Since adopting the SCI in 2018, there have been some recent changes made to the process of public speaking at Planning Committee. A review was recently undertaken with the Chairman and Vice-Chairman of the Planning Committee to review the process and a number of changes have now been implemented.

These are now proposed to be included formally within this newest version of the SCI.

c) Increased scope of engagement using new online platforms

10. The COVID-19 pandemic has seen the emergence of video conferencing through software such as Microsoft Teams and Zoom. The new SCI incorporates these widely used video conferencing platforms within the potential full range of engagement methods, in order that the Council may capitalise on the increased engagement opportunities that they provide.

Other minor changes

11. It should also be noted that the SCI has been subject to a number of minor modifications throughout the document and the format/presentation changed to improve legibility and be visually clearer, including adding a flow diagram for Local Plans, SPDs and NPs to set out within a page what the overall process is. The minor modifications, which are the result of ongoing improvements to our engagement processes include, most notably, a new paragraph in the introduction which highlights the role of the Planning Service Review in improving how we communicate and engage with our community.
12. The SCI also refers to the Council's temporary Coronavirus Addendum (originally published in August 2020), which sits alongside the SCI and was produced in accordance with Government guidance and temporary changes in legislation. The Addendum identifies methods of engagement that may no longer be practicable under the conditions of the pandemic and sets out how Council's Strategy and Planning Service can safely continue to carry out its consultation and engagement responsibilities during these times.

Conclusion

13. The updated SCI will provide a clear, transparent basis for carrying out consultations on future plans – to which the Council may be held to account – and will provide a useful reference to all interested parties on what involvement they can expect to have in planning decisions.
14. Following the six-week public consultation on the draft updated SCI which took place between 11 June – 23 July, and its incorporation of subsequent minor modifications, it is concluded that the draft updated SCI be recommended to Council for adoption.
15. Comments made today will be recorded and reported verbally to full Council.

Financial Implications

16. None

Legal Implications

17. The risk of not updating the SCI is that future consultations may be deemed to not comply with recent updates to planning legislation, particularly in relation to the Duty to Co-operate. There is a risk of creating unrealistic expectations of community engagement via a new SCI, especially given resource constraints, but the proposed SCI maintains flexibility on approaches to take such factors into account.

Human Resources Implications

18. None

Equalities and Diversity

19. The 2018 SCI was subject to an Equalities Impact Assessment. This is still relevant, however it has been updated to reflect the 2021 updated SCI.

Other Implications	Applies?	Other Implications	Applies?
Human Rights	No	Equalities and Diversity	Yes
Crime and Disorder	No	Consultation	Yes
Environmental	No	Access to Information	No
Sustainability	No	Exempt from publication	No
Risk Management	No		

Executive Director:	Malcolm Johnston		
Proper Officer:	Ben Hook		
Report Contact Officer:	Ben.hook@rother.gov.uk		
e-mail address:			
Appendices:	A	Draft 2021 Statement of Community Involvement	
	B	Consultation Summary Report	
Relevant Previous Minutes:			
Background Papers:	None		
Reference Documents:	None		

Rother District Council
Statement of Community Involvement
October 2021

DRAFT

Contents

1.	Introduction	6
2.	General Principles.....	8
	Consultation Charter	8
	Access and equalities	9
	Means of involving people.....	9
	Making comments and their availability.....	10
	Consideration of comments	10
3.	Planning Policy	11
	Planning policy documents	11
	Other planning documents	13
	Approach to consultations and engagement.....	15
	Comments and formal representations	18
	Consideration and feedback	19
	Opportunities to be involved in plan-making	20
	Advice and assistance in relation to Neighbourhood Planning.....	39
4.	Development Management	41
	Pre-application stage	42
	Availability of planning applications and statutory publicity	43
	Planning Committee.....	45
	Scheme of Delegation.....	47
	Permission in Principle and Brownfield Land Registers	47
	Decision Notices	50
	Feedback	50
	Appeals	50
5.	Monitoring and Reviewing.....	51
	Appendix A - General and Specific Consultation Bodies.....	52
	Appendix B - Neighbourhood Plan Consultation Bodies	54
	Appendix C - Glossary of Abbreviations	56

Due to the current Coronavirus Pandemic this document should be read in conjunction with the [temporary Coronavirus Addendum](#). The temporary Addendum identifies methods of community engagement within this document that are not practicable at this time, while setting out temporary measures to ensure that the Council's Strategy and Planning Service can safely continue to carry out its various functions for which it is responsible.

1. Introduction

- 1.1 Planning for land use and development in the District is one of the Council's key responsibilities, impacting both directly and indirectly on individuals and communities.
- 1.2 It follows that people and groups potentially affected by planning policies and proposals should have the opportunity to be effectively involved in decision-making and should understand what those opportunities are.
- 1.3 **This Statement of Community Involvement (SCI) explains the arrangements for public involvement in Rother District Council's planning processes. It covers both the preparation of planning policy documents and the determination of planning applications.**
- 1.4 It updates the previous SCI, which was adopted in December 2018, to explain the consultation processes as part of the Council's new Local Plan 2019-2039. Development of the new Local Plan gives an additional emphasis to early (pre-production) engagement, and this SCI update sets out in more detail what this engagement will involve for future Local Plans. This SCI also covers a new provision for pre-applicants to present their development proposals to planning committee and other members, which will be recommended by officers where the proposed development would be of a significant nature.
- 1.5 The Planning Service has recently undergone a Review, the outcome of which is an action plan focused on improving how we interact with people and groups and how we keep customers up-to-date. These actions will feed into the next SCI, in order that community involvement is improved.
- 1.6 It is important to note that in accordance with Government guidance, the Council has produced a [temporary Coronavirus Addendum](#) (originally published in August 2020) to identify methods of community engagement that are not practicable at this time, while setting out temporary measures to ensure that the Council's Strategy and Planning Service can safely continue to carry out its various functions for which it is responsible.

- 1.7 This Addendum identifies methods of engagement set out in the SCI which are not practicable under the conditions of the coronavirus¹ pandemic, such as those requiring face-to-face contact and shared handling of documents, whilst setting out alternative methods of engagement that may be used in order that plan making can continue during this time. In addition, where the pandemic has impacted upon workloads, the Council may, where necessary, suspend any of its discretionary engagement and services to safeguard its statutory duties. There may be further temporary minor changes made to the SCI without public consultation due to the changing nature of the ongoing pandemic. Should further changes be necessary these will also be reflected in an update to the temporary Coronavirus Addendum.
- 1.8 The following Section (2) sets out the Council's **General Principles** for consultation, which remain as previously.
- 1.9 Section 3 highlights the opportunities to contribute to the formulation of local **Planning Policy**. This relates to the production of the District Councils' Local Plan and any supplementary planning documents, as well as a section on the preparation of Neighbourhood Plans.
- 1.10 Section 4 deals with **Development Management**, i.e. the consideration of planning applications, applications for listed building consent, conservation area consent, etc. It sets out commitments for making information available on such applications and the opportunities for making comments on them, including the public speaking process at Planning Committee.
- 1.11 The final Section 5 highlights how and when **monitoring and review of the Statement of Community Involvement (SCI)** will take place.

¹ "coronavirus" means severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2).

2. General Principles

- 2.1 There are several principles that apply to the approach to consultation, access to information, participation for all, openness and treatment of comments for all areas of planning.

Consultation Charter

- 2.2 The Council has a Consultation Charter which identifies several principles for public consultation across its services. Its principles are reproduced below:

The Council acknowledges and undertakes that:

1. consultation is a fundamental part of good public service; it will be the starting point not an afterthought
2. consultation will be based on openness, trust, integrity and mutual respect for all participants
3. where appropriate, consultation will be used to seek views before decisions are made
4. requests to consult may come from inside or outside the Council
5. consultation will seek to involve all parties who can contribute to or who are affected by the outcome of consultation
6. it will seek to explain to people why they are being consulted, what they are being consulted about and how their views will contribute to any decision
7. some people will be less able to participate in consultation than others; specific efforts will be made to identify and target these people; every effort will be made to ensure that consultation is representative
8. it will seek to ensure that the issues are clearly understood and that objectives, timescales and expectations are clearly identified
9. relevant and easily understandable information will be provided to consultees with particular attention to those who have special communication needs
10. the results of the consultation and any impact upon Council decisions will be provided in the most appropriate form both to consultees and the wider community

- 2.3 The Council recognises that planning material is often technical in nature; hence, consultation documents produced by the Council, will be as clear and concise as practicable, using plain English as far as possible, avoiding, or at least explaining 'jargon' (possibly in a 'glossary') without detracting from the complexities of issues.

Access and equalities

- 2.4 In terms of ensuring engagement of all sections of community, particular attention will be given to “hard to reach” groups. This includes meeting the public sector equality duty to advance equality of opportunity between different groups, associated with age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, and sexual orientation. ‘Equality Objectives’ are set in in a separate document, see: <http://www.rother.gov.uk/equality>.

Means of involving people

- 2.5 The Council will seek to choose appropriate consultation processes that best balance community impact, accessibility and available resources. Greater use is being made of online and social media methods of consultation, while appreciating that they are not accessible for all members of the community. Some forms of consultation and public involvement can be time intensive. Hence, detailed decisions about the methods of involvement to be used at a particular stage will need to consider the availability of resources at the time. In particular, events which require considerable staff involvement, such as exhibitions, will need to be utilised appropriately and where the outputs of such events will have the greatest benefits.
- 2.6 In addition, Councillors regularly undertake planning training sessions, which enables them to communicate and engage with residents in respect of planning related matters.
- 2.7 The Coronavirus pandemic has seen an expansion of the use of online technologies to the way that we work and communicate. Whilst the end of the pandemic will see a return to the full range of engagement methods as set out in this SCI, the Council will also look to capitalise on the increased opportunities for wider engagement that these new online platforms have provided.

Making comments and their availability

- 2.8 As part of the transparency and openness of decision-making, and in accordance with the legal framework set by the General Data Protection Regulations 2016 and the Data Protection Act 1998, comments made on planning documents and on planning applications will be made publicly available. They cannot be treated in confidence. However, the Council will not publish personal information such as signatures, telephone numbers and email addresses online. Where such personal information has been provided in correspondence to the Council, then this information will be redacted before it is published publicly.
- 2.9 Comments made, whether on policy documents or planning applications should be made within the timescale prescribed, relate to the particular document/application, not be anonymous and not be potentially libellous, defamatory, threatening, abusive or likely to incite racial hatred.

Consideration of comments

- 2.10 All comments made in response to consultations on planning policy documents and on planning applications will be considered in decision-making where they relate to 'material considerations'. Guidance on what constitutes 'material considerations' for planning purposes is outlined in Section 4 of this document. However, it may not always be appropriate to determine matters in line with comments received. The Council is obliged to consider, firstly, conformity with local planning policies, consistency with national policies, as well as having regard to all material considerations (which may pull in different directions) in making balanced decisions.

3. Planning Policy

Planning policy documents

- 3.1 Councils are obliged to prepare a 'Local Plan' setting out their policies for development and the use of land in their area which, in turn, provides the basis for decisions on planning applications. Its 'strategic policies' also provide a framework for the preparation of 'Neighbourhood Development Plans' (often referred to more simply as "Neighbourhood Plans") by local communities.
- 3.2 In Rother, the current adopted **Local Plan** covers the period up to 2028 and is set out in the following documents.
- The [Core Strategy](#), which sets the overall vision and objectives for the area, the related development strategy and core policies ("Part 1")
 - The [Development and Site Allocations Local Plan \(DaSA\)](#), which allocates sites for development and contains detailed policies to elaborate on those in the Core Strategy ("Part 2")
 - Remaining extant policies from the [2006 Local Plan](#). These extant policies consist of site allocations and development boundaries within Neighbourhood Plan areas where a neighbourhood plan is not yet in place.
- 3.3 The Council has commenced the process of developing a new Local Plan, which will cover the period up to 2039. It is expected that the new Local Plan will embrace the development strategy and key site allocations in a single document. The New Local Plan will supersede the documents listed above in paragraph 3.2.
- 3.4 The significance of the 'Duty to Cooperate' (DtC) as introduced in the Localism Act 2011² means that the Council places particular importance on 'early and continual effective engagement' in respect of all stages in the production of the Local Plan. Emerging Government policy³ has also stated its intention to require Local Plans to 'front-load' the engagement process to facilitate the wider community having a more significant role in shaping new policy at the earliest stage.

² Section 110 of the Localism Act, incorporated into Section 33A of the Planning and Compulsory Purchase Act 2004

³ [The Government White Paper Planning for the Future – August 2020](#)

- 3.5 Details of DtC engagement are recorded and evidenced in a Consultation and Engagement Statement, produced in support of the Local Plan at submission stage. The Council will publish a series of draft Statements of Common Ground (SoCG) or Statements of Intent, in advance of the formal Regulation 18 stage consultation, and final SoCGs will be published by the time the Proposed Submission draft plan is published (Regulation 19 stage).
- 3.6 The Council can also prepare **Supplementary Planning Documents (SPDs)** – these support particular local plan policies by providing guidance either on particular subjects or specific, normally more complex, sites.
- 3.7 **Neighbourhood Plans (NPs)** are prepared by the local community (which means the relevant Town or Parish Council where one exists or specifically constituted Neighbourhood Forums), with the support of the local planning authority. Their preparation and scope are discretionary; they may include the allocation of sites and policies to guide development. When in place (“made”), they form part of the Development Plan and the policies contained within them are then used in the determination of planning applications.
- 3.8 For up-to-date information on existing plans and those in the course of preparation, please either visit the [Planning Policy page](#) on the Council’s website or one of the Council’s Contact Centres.
- 3.9 There are also separate [Waste and Minerals Local Plans](#). These are the responsibility of East Sussex County Council. Further details about the programme of preparing these plans and the opportunities for involvement in them are published on East Sussex County Council’s website at: <http://www.eastsussex.gov.uk/environment/planning/development/mineralsandwaste/>

Other planning documents

- 3.10 Local Plans need to be supported by a [Sustainability Appraisal/Strategic Environmental Assessment](#) (SA/SEA) to ensure that the social, economic and environmental consequences of their policies and proposals are fully taken into account. Supplementary Planning Documents (SPD) do not usually require such an assessment because they will normally relate to a policy or site that has undergone an SA/SEA as part of the Local Plan. Neighbourhood Plans must be supported by an accompanying SEA where it has been assessed that the Neighbourhood Plan's policies are likely to have significant environmental effects. A SA/SEA Report is itself subject to public consultation; hence, the tables below also highlight the various stages of the SA/SEA process.
- 3.11 There is no legislative requirement for Statements of Community Involvement (SCI) to be subject to consultation, however it is considered good practice for councils to inform the public of updates that are intended to be made to the SCI. The Council has considered that its SCI will be subject to consultation, except under exceptional circumstances such as emergency amendments where it would be ineffective to do so. The consultation process for the SCI will be similar to that for SPDs, with public consultation on a draft SCI, comments in response to which will be reported back to the Council and considered in approving the final SCI.
- 3.12 The programme for preparing the Local Plan, SPDs and the SCI is set out in the Council's [Local Development Scheme](#) (LDS) which is updated at regular intervals in relation to the delivery of the Local Plan.
- 3.13 In addition to these documents, the Council also publishes a CIL Charging Schedule. The Council has adopted a [Community Infrastructure Levy \(CIL\)](#) to raise contributions for the provision of new infrastructure to support sustainable growth. The [CIL Charging Schedule](#) sets out the levy that applies to specified types of development, subject to exemptions set out in regulations. Like a draft Local Plan, the consultation on a Draft CIL Charging Schedule is subject to statutory consultation followed by Independent Examination.

- 3.14 In the preparation and support of the Local Plan, the Council also publishes several other documents including: background evidence documents; monitoring reports; the Brownfield Land Register; the Housing Delivery Action Plan; the Infrastructure Delivery Plan; and the Local Development Scheme. These documents do not require public consultation.
- 3.15 The below table summarises the planning policy documents for which it is a statutory requirement to undertake public consultation; those where the council has the option to undertake consultation subject to Council policy; and those documents that are not subject to consultation.

Figure 1 – Planning policy documents and consultation

Documents where public consultation is a statutory requirement
Development Plan Documents: <ul style="list-style-type: none"> • Local Plan (including SA/SEA) • Neighbourhood Plans (including SEA if required) • Supplementary Planning Documents (including SA/SEA if required) CIL Charging Schedule
Documents where public consultation is a Council requirement
Statement of Community Involvement (SCI) Infrastructure Delivery Plan (IDP) ⁴
Documents that are not consulted on
Local Development Scheme (LDS) Brownfield Land Register Monitoring reports <ul style="list-style-type: none"> • Local Plan Monitoring Report • Housing Land Supply Report • Employment Land Supply Report Infrastructure Funding Statement Housing Delivery Action Plan Background evidence documents

⁴ Consultation on the IDP is required only in respect of specific consultees where relevant – for example, Highways England would be consulted in cases where proposals set out in the IDP may impact upon the Strategic Road Network.

Approach to consultations and engagement

- 3.16 Regulations⁵ provide basic requirements for consultation, including specifying several bodies which local planning authorities must consult when preparing planning policy documents. For Local Plan related consultations these are set out under '*specific consultation bodies*', and '*general consultation bodies*'. For Neighbourhood Plan consultations, statutory consultees are set out under '*consultation bodies*'. Both '*general consultation bodies*' and '*consultation bodies*' also include voluntary bodies active in the area, and those bodies which represent the interests of different racial, ethnic or national groups, different religious groups, disabled persons, and of persons carrying on business in the area. Full lists of '*specific*' and '*general*' consultation bodies are set out in Appendix A. A full list of '*consultation bodies*' in respect of Neighbourhood Plans are set out in Appendix B.

⁵ The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and the Neighbourhood Planning (General) Regulations 2012 (as amended)

- 3.17 The full range of organisations and individuals who should be involved in developing planning policy can be categorised into the following groupings:

Figure 2 – Consultee groups for statutory public consultations⁶

A – Local groups and individuals. This group includes residents, community groups, voluntary groups and specific interest groups (for example chambers of commerce, conservation societies) as well as interested individuals.

B – Parish and town councils, adjoining parish councils. Town and Parish Councils have a particular role to play in representing the views of their communities in the planning process – as part of this a Parish Conference is held each year to promote consultations and seek opinion .

C – Utility and service providers. This group includes water, sewerage, gas and electricity companies, health providers and emergency services.

D – Government bodies/neighbouring local authorities and collaborative bodies. This group includes, the East Sussex Strategic Planning Group, the South East Local Enterprise Partnership, the High Weald Joint Advisory Committee and the Sussex Local Nature Partnership, as well as East Sussex County Council, neighbouring district and borough councils and relevant Government departments.

The ‘duty to cooperate’ introduced in the Localism Act 2011⁷ and reflected in the NPPF, gives added emphasis to constructive and ongoing cooperation with neighbouring councils and other public bodies to ensure that strategic issues are appropriately addressed across local authority boundaries. There needs to be particular collaboration with Hastings Borough Council given common economic and housing markets.

E – East Sussex and Rother Local Strategic Partnerships

F – National organisations and agencies. There are a range of national organisations and agencies which have specialist expertise to input. Examples of such groups are Historic England, Natural England, the Environment Agency, Highways England and Sports England.

G – Developers, landowners, planning consultants

- 3.18 A full list of consultees is set out in the groups identified above, which the Council will contact as part of any relevant public consultation on an emerging planning policy document is held by the Council. This is a “live” list as it is subject to continuous update and change. Organisations and individuals can contact the Council at any time to add, amend or remove their details⁸.

⁶ Organisations specifically named within Figure 2 are examples of organisations within the identified group categories.

⁷ [Section 110 of the Localism Act](#)

⁸ Organisations and individuals can ask to be added to the consultation list at any time by returning the following Planning Policy Contact Form [Word version](#) / [PDF version](#) to planning.strategy@rother.gov.uk or by calling 01424 787668.

- 3.19 Due to the coronavirus pandemic, certain methods of engagement are not practicable currently. This affects those methods which require face-to-face contact, as well as methods that require the physical handling of documents. Please see the temporary [Coronavirus Addendum](#) for more details.
- 3.20 The range of methods that will or may be used to help inform and engage the community about planning policy formulation are:

Figure 3 – Methods of community engagement

<p>Publication on the Council’s website. The Council will publish documents, statements, and any associated information on its website.</p>
<p>Web-based consultation. The Council will advertise all public consultations on its website, with full details and relevant documents available to view on dedicated pages, accessible via www.rother.gov.uk/planningpolicy. (NB A facility is provided to listen to the website. This is clearly marked by the word ‘Listen’ on the top right hand of the webpages. Clicking on the word ‘Listen’ also displays additional options for additional accessibility, such as translation of the website into a number of other languages, as well as colour and font selection.)</p>
<p>Written notifications. The Council will make direct contact by email or letter with known consultation bodies and those who have asked to be notified that a consultation is taking place and will invite participation in that consultation. Details of the consultation, including the availability of documents, will be explained within the notification.</p> <p>Organisations and individuals can ask to be added to the consultation list at any time by returning the following Planning Policy Contact Form Word version / PDF version to planning.strategy@rother.gov.uk or by calling 01424 787668.</p>
<p>Making documents available for inspection. As well as publishing draft documents and supporting material online (see above), hard copies of documents will made available for inspection, at the Council’s principal office (Town Hall, Bexhill-on Sea), and if appropriate other locations may be considered. Being ‘made available’ can be either through the deposit of physical copies AND/OR by being viewable online via public access computers. Consultation documents will also be available to purchase, at ‘cost’ price.</p> <p>Documents can be provided in large print, Braille, on audio tape or CD, and translated into other languages upon request.</p>
<p>Public notices. Public notices will be placed on the Council’s website and, where appropriate, in local newspapers at key stages of plan production.</p>
<p>My Alerts. ‘My Alerts’ is a weekly email service providing information for Rother residents and businesses. Notice of consultations will be included in these. To subscribe, go to http://www.rother.gov.uk/article/10728/My-Alerts</p>
<p>Social media. The Council makes use of social media and will post information via its Twitter and Facebook accounts www.facebook.com/RotherDC and</p>

<p>@RotherDC and/or @RDCconsult respectively. However, during formal consultations, comments will not be accepted via social media.</p>
<p>Press releases/briefings. Newspaper features may be promoted via press releases and/or briefings to convey information about the scope and timing of consultations to a wide audience.</p>
<p>Posters/Leaflets. Dedicated posters and/or leaflets may be used to gain wider public awareness of a consultation.</p>
<p>Exhibitions, Workshops and Presentations (in person and on-line). Events may be held to convey information about an emerging policy document and both publicise the opportunity for public involvement and enable face-to-face discussion about issues and options.</p>
<p>Meetings/Focus Groups. These may be selectively used as a means of bringing different perspectives together to discuss a particular theme in a structured way. Meetings may be appropriate to discuss issues of a technical nature, such as with specific statutory bodies and service providers, or with key stakeholder groups, including Parish Councils and District Councillors. Meetings or focus groups may also take place online using digital conferencing programs such as Microsoft Teams and Zoom, etc.</p>

- 3.21 Whenever a public exhibition or meeting is held, the venue chosen should be fully accessible to all members of the community and be located as conveniently as possible for the expected audience.

Comments and formal representations

- 3.22 In relation to making comments and representations:
- Comments/representation forms will normally be provided for Planning Policy consultations.
 - For Planning Policy consultations, the Council will normally facilitate, and encourage, comments to be submitted via its online consultation system, the link to which will be made available on the website in relation to the relevant consultation. (This makes it easy to keep a record of views submitted and be in a form that allows them to be readily considered by the Council.)
 - Comments may be submitted in writing either by email or by post.
 - During formal consultations, all comments received either via email, or in the case of Local Plans also via the online consultation system, will be acknowledged. We are unable to acknowledge comments submitted in writing.
 - The use of 'representation forms' or the online consultation system will

be expected when making formal representations on 'proposed submission' Local Plans (see below), as they should address the specific tests which a Local Plan is assessed against.

- A clear deadline for the receipt of comments will be given. Comments must be received by the date/time given.

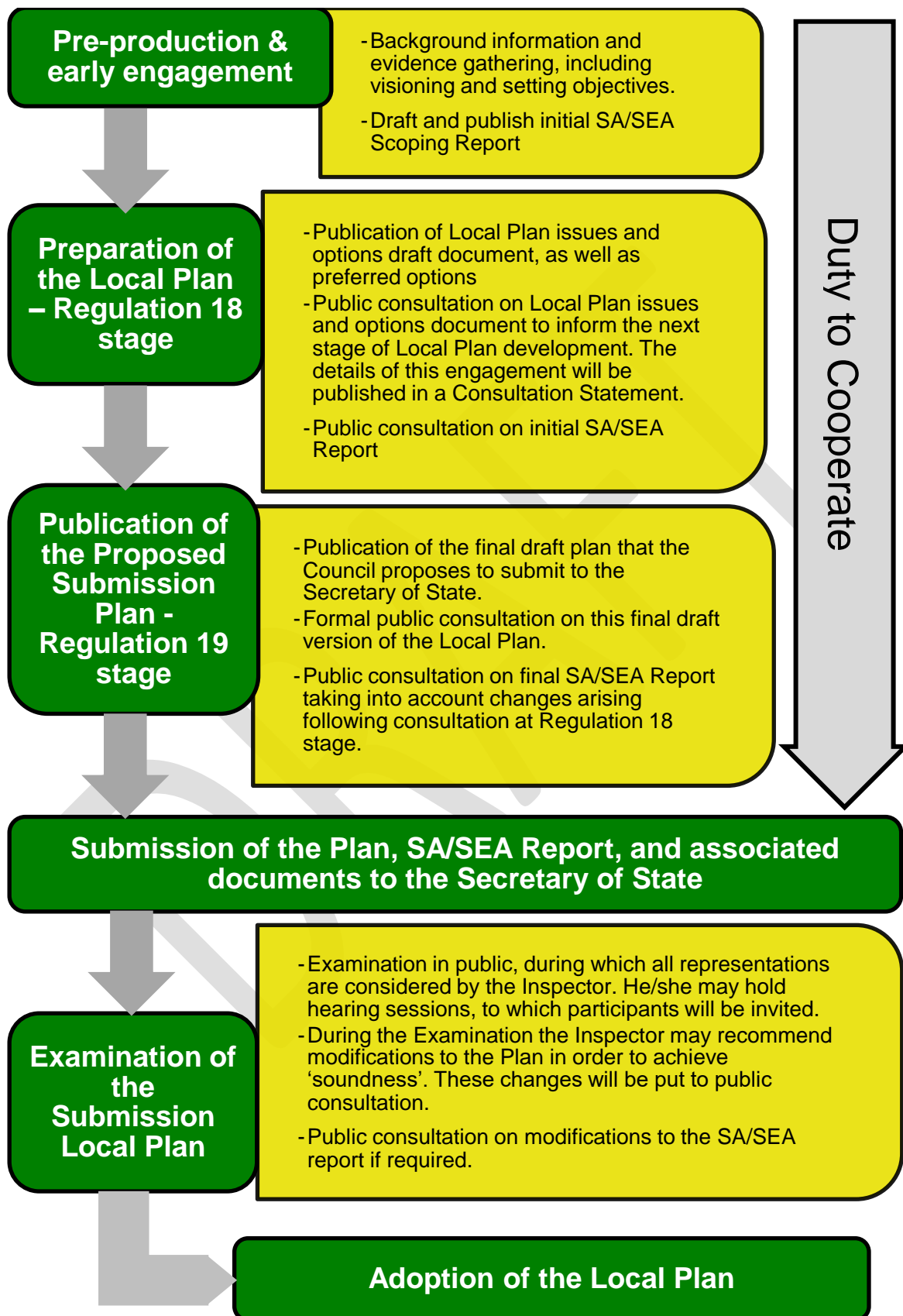
Consideration and feedback

- 3.23 An important aspect of community involvement is to offer feedback to those who have taken part.
- 3.24 The Council will take account of the comments made in progressing planning policy documents and will give reasons for its decisions in the light of comments made. This consideration and feedback will be presented in either a consultation summary report or a Consultation Statement. Consultation Statements are statutory documents that must be produced to support the Local Plan at the Proposed Submission and Submission stages. A Consultation Statement provides additional information to that of a consultation summary report in that it will also present how the Council has effectively engaged to plan for cross-boundary matters under the 'duty to cooperate' and will identify the nature and extent of comments/representations made at all consultation stages.
- 3.25 At the 'proposed submission' stage of Local Plan preparation, regulations provide for representations to be considered during the examination process, so feedback is not normally given prior to the examination.

Opportunities to be involved in plan-making

- 3.26 Planning policy documents are the subject of legislative requirements for publicity and consultation. These ensure that there will be opportunities for everyone to participate in the production of all planning policy documents.
- 3.27 Different types of plans, understandably, have particular processes for preparation and public involvement. The nature of involvement also varies depending on the stage of plan-making.
- 3.28 The tables below (A-L) show the stages of plan preparation and the opportunities for engagement, for Local Plans, Supplementary Planning Documents (SPDs), and Neighbourhood Plans. Each document type is introduced with a flow diagram to outline the different stages for the development of each document.
- 3.29 Within the tables, the left-hand column identifies the stages within plan preparation and sets out the engagement tasks required to achieve these stages, and details both statutory and optional engagement activities. The right-hand column identifies the corresponding methods of engagement as set out in **Figure 3**. An exception to this is Table H within the neighbourhood planning section, where a further left-hand column has been created to denote who is responsible for each respective task.
- 3.30 The methods of engagement in the right-hand column should not be read as prescriptive but are examples of the type of activity that may take place. In particular, the methods of engagement that involve publicity wider than the Council's website and formal notices, are discretionary, and their use is subject to the availability of resources. The methods of engagement for publicity include:
- Public notices.
 - My Alerts.
 - Social media.
 - Press releases/briefings.
 - Posters/Leaflets.

Stages of Local Plan Production



Local Plan preparation and opportunity for involvement

Table A - Pre-production and Early Engagement

Background information and evidence gathering	Engagement
Identification of key issues and challenges for the District, including visioning and objective setting.	
<p><u>Examples of this could include:</u></p> <ul style="list-style-type: none"> • Informal early consultation relating to matters within the District to utilise internal knowledge, for example the consulting of Parish/Town Councils and Members on planning matters regarding local areas. • Informal consultation on visioning/objective setting in the context of the Local Plan and SA baseline, potentially with Members, parishes or other targeted organisations. This could also include workshops / virtual workshops. 	<ul style="list-style-type: none"> • Written notifications • Meetings / Focus Groups (virtual or otherwise)
Development of baseline evidence to support the plan	Engagement
<p><u>Examples of this could include:</u></p> <ul style="list-style-type: none"> • Public targeted consultation for landowners (Call for sites) to put forward sites that may be suitable for consideration for their development, to inform assessments of land availability. 	<ul style="list-style-type: none"> • Publication on the Council's website • Web-based consultation • Written notifications • Meetings / Focus Groups (virtual or otherwise)
SA/SEA Scoping Report and development of SA Framework	Engagement
Working with Members, stakeholders and the wider local community to be involved in setting a vision for the Local Plan, and the identification of key strategic issues and how they are to be addressed through the Local Plan.	
<p><u>Statutory requirement:</u></p> <ul style="list-style-type: none"> • Formal targeted consultation on the SA/SEA Scoping report with statutory consultees, comprising of Natural England, Historic England and the Environment Agency, and any additional organisations that the Council may want to consult. (Statutory requirement - Reg 12 & 13 of Environmental Assessment of Plans and Programs Regulations 2004). 	<ul style="list-style-type: none"> • Written notifications • Meetings / Focus Groups (virtual or otherwise)
<p><u>Other options could include:</u></p>	<ul style="list-style-type: none"> • Meetings / Focus Groups (virtual or otherwise)

<ul style="list-style-type: none"> • Potential opportunities to work with key partners in delivering a Joint approach / methodology to developing an SA Framework. 	
Early Engagement with partners and stakeholders, including Duty to Cooperate⁹	Engagement
To identify cross boundary strategic matters that will form the basis of the Council’s ‘Duty to Cooperate’, and to propose a programme of further engagement to develop Draft Statements of Common Ground	
<u>Examples of this could include:</u> <ul style="list-style-type: none"> • Informal consultation on a Duty to Cooperate Action Plan¹⁰ and other Early engagement documents, with statutory consultation bodies, as well as other organisations as the Council deems necessary. • Meetings and conference calls with Neighbouring Authorities and development/progress of Statements of Common Ground on strategic cross-boundary issues. • Provide a Council representative on working groups in relation to the strategic matters, for example: Ashdown Forest, Pevensey Levels Catchment, Combe Valley catchment, Gypsy and Traveller Accommodation Assessment. 	<ul style="list-style-type: none"> • Written notifications • Meetings / Focus Groups (virtual or otherwise)
<p><i>There may be opportunities for further targeted engagement, arising out of early engagement. Ongoing engagement will continue throughout the development of the Plan at all stages.</i></p>	

Table B - Preparation of the Local Plan

Publication of Regulation 18 stage Local Plan	Engagement
<p>At this stage, the Council will set out the key issues and options for addressing them, with preferred options where appropriate. It may include draft policies.</p> <p>The Council will be engaging with neighbouring planning authorities to develop Statements of Common Ground in the lead up to the Reg 18 consultation.</p>	
<u>Statutory requirements:</u> <ul style="list-style-type: none"> • Public consultation for a minimum of 6 weeks on the scope of the local plan, issues and options and, where identified, preferred options, as well as on the initial 	<ul style="list-style-type: none"> • Web-based consultation

⁹ Please note: [The Government White Paper Planning for the Future – August 2020](#) has proposed that the Duty to Cooperate be removed from the Local Plan process. However, it is likely that activities relating to the Duty to Cooperate will continue.

¹⁰ The Duty to Cooperate Action Plan is specific to pre-production work on the 2019-2039 Rother District Local Plan Update. As noted in footnote 1, it is expected that Government will remove the Duty to Cooperate as a formal requirement.

<p>SA/SEA report. The Council may decide it is necessary for the consultation period to extend beyond the statutory 6-week timeframe depending on local circumstances.</p>	
<ul style="list-style-type: none"> Notify interested parties, statutory consultees and stakeholders: The Council will make formal direct contact by email or letter with known consultation bodies and those who have been asked to be notified that a consultation is taking place and will invite participation in that consultation. (Requirements for who is to be notified derive from Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).) 	<ul style="list-style-type: none"> Written notifications
<ul style="list-style-type: none"> Publicity: In addition to the above notification process, the Council will publicise widely, using public notices in local papers, advertise using social media and the Council's My Alerts weekly information email service, and may also use posters and leaflets. 	<ul style="list-style-type: none"> Public notices My Alerts Social media Press releases / briefings Posters / Leaflets
<ul style="list-style-type: none"> Availability of documents: All relevant documents (Local Plan, SA/SEA Report, and any relevant supporting documents) will be published on the Council's website. <p>All relevant documents will be made available for inspection at the Council's principal office, via hard copy and viewable through the use of public access computers. If appropriate other locations may be considered.</p>	<ul style="list-style-type: none"> Publication on the Council's website Making hard copy documents available
<p><u>Option for additional consultation during this stage:</u></p> <ul style="list-style-type: none"> Consultation(s) may be supported by events/exhibitions which may be targeted at specific local communities or specific organisations. <p>At this preparation stage, it may be necessary to hold more than one public consultation period. This will depend on the range of issues, or further policy approaches or sites that are reasonable options but have not previously been considered that may emerge because of the first public consultation.</p>	<ul style="list-style-type: none"> Exhibitions / Digital exhibitions

Table C – Publication of the Proposed Submission Plan

Publication of the Proposed Submission Plan – Regulation 19 stage	Engagement
<p>This is the final draft Plan that takes account of comments made during the previous public consultation on options. This includes the final SA/SEA Report, considering changes arising following consultation. Responses to comments made at the Regulation 18 stage are contained in a separate ‘consultation statement’. This is the Plan that the Council proposes to adopt.</p> <p>The Council may need to engage further with its Duty to Cooperate partners to respond to issues raised at Reg. 18 stage consultation. The Council will finalise Statements of Common Ground for individual organisations in support of Rother District Local Plan’s submission.</p>	
<p><u>Statutory requirements:</u></p> <ul style="list-style-type: none"> Formal minimum six-week period for representations on proposed Submission Plan and final SA/SEA Report. The Council may decide it is necessary for the consultation period to extend beyond the statutory 6-week timeframe depending on local circumstances. <p>Representations at this stage must relate to specific tests of the soundness of the plan.¹¹ They will be forwarded for consideration by an independent Inspector who will examine the plan.</p> <p>NB Comments made in response to consultation on an earlier version are not carried forward. If anyone is not satisfied with the latest version, they need to respond again.</p>	<ul style="list-style-type: none"> Web-based consultation
<ul style="list-style-type: none"> Notify interested parties, statutory consultees and stakeholders: The Council will make formal direct contact by email or letter with known consultation bodies and those who have been asked to be notified that a consultation is taking place and will invite participation in that consultation. <p>(Requirements for who is to be notified derive from Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended))</p>	<ul style="list-style-type: none"> Written notifications
<ul style="list-style-type: none"> Publicity: In addition to the above notification process, the Council will publicise widely, using public notices in local papers, advertise using social media and the Council’s My Alerts weekly information email service, and may also use posters and leaflets. 	<ul style="list-style-type: none"> Public notices My Alert Social media Press releases / briefings

¹¹ Please note: [The Government White Paper Planning for the Future – August 2020](#) has proposed that existing tests of soundness will be replaced by a single “sustainable development” test.

	<ul style="list-style-type: none"> • Posters / Leaflets
<ul style="list-style-type: none"> • Availability of documents: (Regulation 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)) <p>All relevant documents (Local Plan, SA/SEA Report, and any relevant supporting documents) will be published on the Council's website.</p> <p>All relevant documents will be made available for inspection at the Council's principal office, via hard copy and viewable through the use of public access computers. If appropriate other locations may be considered.</p>	<ul style="list-style-type: none"> • Publication on the Council's website • Making hard copy documents available
<p><u>Option for additional consultation during this stage:</u></p> <ul style="list-style-type: none"> • If, following receipt of representations, the Council believes that major changes are necessary before submission for examination, there would be a further opportunity to comment on these changes. 	<ul style="list-style-type: none"> • Repeat of all above methods used as part of Regulations 19 stage consultation

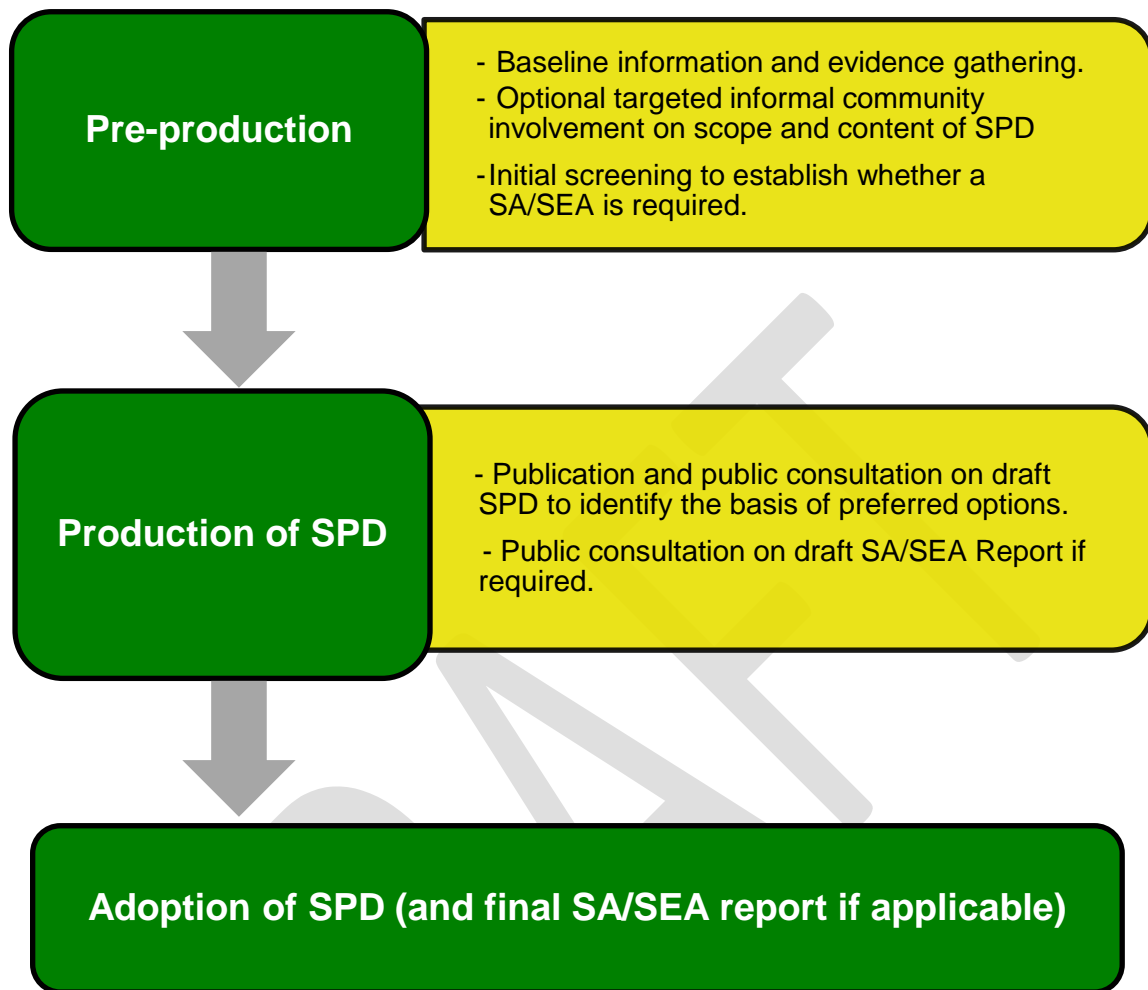
Table D - Local Plan Examination & Adoption

Examination of the Submission Local Plan	Engagement
<p>The Council submits the Plan (including Policies Map if relevant), SA/SEA Report, Consultation Statement, supporting documents and the representations made at the Regulation 19 stage. All engagement here is a statutory requirement, in accordance with Regulation 22 of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)</p>	
<ul style="list-style-type: none"> • Notify interested parties, statutory consultees and stakeholders: The Council will make formal direct contact by email or letter with known consultation bodies and those who have been asked to be notified that the Council has submitted the Local Plan. <p>(Requirements for who is to be notified derive from Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended))</p>	<ul style="list-style-type: none"> • Written notifications
<ul style="list-style-type: none"> • All relevant documents (Local Plan, SA/SEA Report, and any relevant supporting documents) will be published on the Council's website and made available for inspection at the Council's principal office, via hard copy and viewable through the use of public access computers. If appropriate other locations may be considered. 	<ul style="list-style-type: none"> • Publication on the Council's website • Making hard copy documents available
<p>Examination in public, during which all representations are considered by the Inspector. He/she may hold hearing sessions, to which participants will be invited. All engagement here is a statutory requirement, in accordance with Regulation 24 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) . The Examination process is run by the Inspector not the District Council.</p>	

<ul style="list-style-type: none"> Notify anyone who has made a representation at during the Regulation 19 Consultation: The Council will provide notification of public hearing at least 6 weeks prior to its commencement. Regulation 24 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) 	<ul style="list-style-type: none"> Written notifications
<ul style="list-style-type: none"> All relevant documents (Local Plan, SA/SEA Report, and any relevant supporting documents) will be published on the Council's website and made available for inspection at the Council's principal office, via hard copy and viewable through the use of public access computers. If appropriate other locations may be considered. 	<ul style="list-style-type: none"> Publication on the Council's website Making hard copy documents available
<p>Main Modifications (if required)</p>	<p>Engagement</p>
<p>If during the examination, the Inspector advises that changes are needed to the Plan to achieve soundness, the Council may propose such modifications.</p> <p>The arrangements for the consultation would be agreed with the Inspector but will be of the same nature (representations must relate to questions of soundness) and duration (at least 6 weeks) as the consultation held at Regulation 19.</p>	
<ul style="list-style-type: none"> Public consultation on any proposed main modifications and, if needed, any changes to the policies map and SA/SEA Report (and no other aspect of the plan). <p><u>Additional Modifications</u></p> <ul style="list-style-type: none"> The Council may also include additional minor modifications within the consultation. Additional minor modifications are not put before the Inspector and are not part of the Examination. 	<ul style="list-style-type: none"> Web-based consultation Written notifications Public notices My Alerts Social media Press releases / briefings Posters / Leaflets Publication on the Council's website Making hard copy documents available
<p>Publication of Inspector's Report and adoption of the Local Plan</p>	<p>Engagement</p>
<p>The Council will publish the Inspector's Report as soon as is practicable following receipt of the Report. All engagement here is a statutory requirement, in accordance with Regulation 25 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)</p> <p>Upon receipt of a favourable Inspector's Report, the Council may adopt the Local Plan. All engagement here is a statutory requirement, in accordance with Regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)</p>	

<ul style="list-style-type: none"> • Notify interested parties, statutory consultees and stakeholders: The Council will notify anyone who requested to be informed of when the Inspector's Report is Published, and of who requested to be informed of the adoption of the Local Plan, and how in each case they can view the relevant documents which will be made available. 	<ul style="list-style-type: none"> • Written notifications
<ul style="list-style-type: none"> • Availability of documents (Regulation 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)) <p>All relevant documents (Inspector's Report and Adoption Statement, Local Plan, SA/SEA Report, and any relevant supporting documents) will be published on the Council's website.</p> <p>All relevant documents will be published on the Council's website and made available for inspection at the Council's principal office, via hard copy and viewable through the use of public access computers. If appropriate other locations may be considered.</p> <p>All relevant hard copy documents will be made available for at least 6 weeks.</p>	<ul style="list-style-type: none"> • Publication on the Council's website • Making hard copy documents available
<p><i>There is a six-week period for legal challenge after adoption (Regulation 17 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)). (Legal advice is urged if this is being considered).</i></p>	

Stages of Supplementary Planning Document (SPD) Production



Supplementary Planning Document (SPD) preparation and opportunity for involvement

Table E - Pre-production - Supplementary Planning Document

Baseline information and evidence gathering	Engagement
Initial screening to determine whether a SA/SEA is required (Regulation 5 of Environmental Assessment of Plans and Programs Regulations). If required, the Council will publish a Scoping Report for targeted consultation (Regulation 12 of Environmental Assessment of Plans and Programs Regulations)	
<ul style="list-style-type: none"> Formal targeted consultation on the SA/SEA Scoping report with statutory consultees, such as Natural England, Historic England and the Environment Agency, and any additional organisations that the Council may optionally want to consult. (Statutory requirement - Reg 12 & 13 of Environmental Assessment of Plans and Programs Regulations 2004) 	<ul style="list-style-type: none"> Written notifications
Early Engagement	
Optional targeted informal community involvement on scope and content of SPD, dependent upon subject matter, as well as consultation with relevant agencies, service providers and, where appropriate, Parish/Town Councils.	
<ul style="list-style-type: none"> Informal consultations, potentially with Members, parishes or other targeted organisations. This could also include workshops /digital workshops. 	<ul style="list-style-type: none"> Written notifications Meetings / Focus Groups (virtual or otherwise)

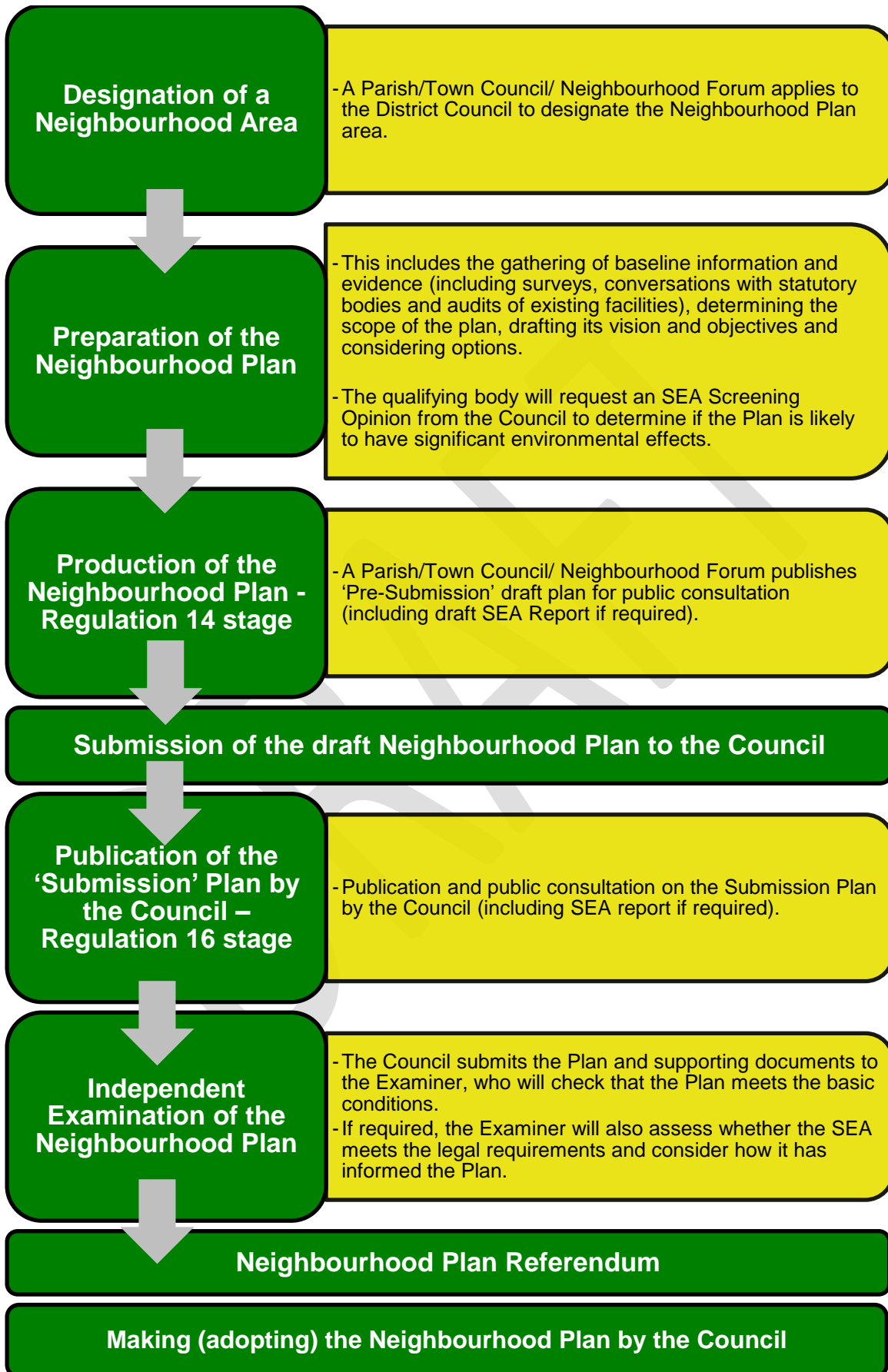
Table F - Production of a draft Supplementary Planning Document

Identification of preferred options for SPD	Engagement
Publication of a draft SPD to identify the basis of preferred options, for public consultation.	
<p><u>Statutory requirements:</u></p> <ul style="list-style-type: none"> Minimum 4-week public consultation period on draft SPD and if required the SA/SEA report. (Regulation 12 & 13 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)) 	<ul style="list-style-type: none"> Web-based consultation
<ul style="list-style-type: none"> Availability of documents (Regulation 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)) <p>All relevant documents (SPD, SA/SEA Report if applicable) will be published on the Council's website.</p> <p>All relevant documents will be made available for inspection at the Council's principal office, via hard copy and viewable through the use of public access computers. If appropriate other locations may be considered</p>	<ul style="list-style-type: none"> Publication on the Council's website Making hard copy documents available
<ul style="list-style-type: none"> Notification: If a SA/SEA report is required, written notifications will be sent to statutory consultees, such as Natural England, Historic England and the Environment Agency. 	<ul style="list-style-type: none"> Written notifications
<p><u>Optional engagement:</u></p> <ul style="list-style-type: none"> Publicity: Depending on the nature of the SPD, local publicity as well as public notices will advertise the public consultation, which may also be supported by events/digital events. 	<ul style="list-style-type: none"> Public notices My Alerts Social media Press releases / briefings Posters / Leaflets
<ul style="list-style-type: none"> Consultation(s) may be supported by events/exhibitions which may be targeted at specific local communities or specific organisations. 	<ul style="list-style-type: none"> Exhibitions/Digital exhibitions
<p><u>Option for Further Consultation:</u></p> <p>Further consultation may be undertaken if responses lead to a significant change of direction.</p>	

Table G – Adoption of the Supplementary Planning Document

Adoption of final SPD	Engagement
<p>Adoption of the final document by the Council, including any revisions in light of consultation on draft and if applicable the final SA/SEA report.</p>	
<ul style="list-style-type: none"> Notification: The Council will notify anyone who requested to be informed of the adoption of the SPD, and how they can view the relevant adoption documents. (In accordance with Regulation 14 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)) 	<ul style="list-style-type: none"> Written notifications
<ul style="list-style-type: none"> Availability of documents: (Regulation 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)) <p>All relevant documents (SPD, SA/SEA Report if applicable, Consultation Statement & Adoption Statement) will be published on the Council's website.</p> <p>All relevant documents will be made available for inspection at the Council's principal office, via hard copy and viewable through the use of public access computers. If appropriate other locations may be considered.</p> <p>All relevant documents will be made available for at least 3 months.</p>	<ul style="list-style-type: none"> Publication on the Council's website Making hard copy documents available
<p><i>There is a 3-month period for applications to the High Court to request a Judicial Review of the adoption of the SPD Regulation 11 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). (Legal advice is urged if this is being considered)</i></p>	

Stages of Neighbourhood Plan Production



Neighbourhood Plan preparation and opportunity for involvement

For details of advice and assistance that the Council will provide the Qualifying Body please see page 37.

Please note that in the below tables on Neighbourhood Plan processes, the term ‘*Relevant Body*’ and then subsequently ‘*Qualifying Body*’ will be used to identify the Parish/Town Council or designated Neighbourhood Forum, and the term ‘The Council’ will be used to identify the Local Planning Authority. The first table (Table H) has an additional left-hand column to denote who is responsible for each respective task.

Table H - Designation of a Neighbourhood Area

Responsible Organisation	Designation of a neighbourhood area (and, if appropriate, neighbourhood forum¹²)	Engagement
A Parish/Town Council/ Neighbourhood Forum applies to the District Council to designate the Neighbourhood Plan area. No consultation is required if the area proposed is the whole of a single Parish, as the Council must designate the area.		
Rother District Council	<ul style="list-style-type: none"> Following the application by the ‘Relevant Body’¹³ for the designation of a Neighbourhood Area, the Council will consult on the area application for a minimum of 6 weeks, where the area differs from the parish boundary or is for a Neighbourhood Forum. Regulation 6 of the Neighbourhood Planning (General) Regulations 2012 (as amended) (as amended) 	<ul style="list-style-type: none"> Web-based consultation
Rother District Council	<ul style="list-style-type: none"> Publicity: The application will be publicised on the Council’s website, and any other manner that the Council considers appropriate to bringing the area application to the attention of affected persons within that area. 	<ul style="list-style-type: none"> Public notices My Alerts Social media Press releases / briefings

¹² For areas without a town or parish council, a ‘neighbourhood forum’ will need to be established in order to produce a neighbourhood plan.

¹³ “(2)A “relevant body” means— (a) a parish council, or (b) an organisation or body which is, or is capable of being, designated as a neighbourhood forum (on the assumption that, for this purpose, the specified area is designated as a neighbourhood area).” - section 61G(2) of the 1990 Act (inserted by paragraph 2 of Schedule 9 to the Localism Act 2011 (c.20)
<http://www.legislation.gov.uk/ukpga/2011/20/schedule/9/paragraph/2>

		<ul style="list-style-type: none"> • Posters / Leaflets
Relevant Body	<p><u>Optional pre-application consultation</u></p> <p>Before applying to designate the neighbourhood area, the Parish/Town Council or neighbourhood forum may decide to consult with the local community about preparing a Neighbourhood Plan.</p>	

Table I - Preparation of the Neighbourhood Plan – Responsibility of Qualifying Body

Preparing the Plan - by the local Parish/Town Council or Neighbourhood Forum	Engagement
<p>Preparation of the Plan includes the gathering of baseline information and evidence, (including surveys, conversations with statutory bodies and audits of existing facilities), determining the scope of the plan, drafting its vision and objectives and considering options.</p>	
<ul style="list-style-type: none"> • It is expected that there will be consultation with the local community, including residents, businesses, local groups, organisations and others with an interest in the Neighbourhood Plan, as appropriate, to inform its preparation. 	<ul style="list-style-type: none"> • Written notifications • Meetings / Focus Groups (virtual or otherwise)
<ul style="list-style-type: none"> • The qualifying body will request an SEA Screening Opinion from the Council to determine if the Plan is likely to have significant environmental effects. Following consultation with statutory environmental bodies, the Council will advise whether a SEA is necessary, within 5 weeks. As required by Regulation 5 of The Environmental Assessment of Plans and Programmes Regulations 2004 	<ul style="list-style-type: none"> • Written notifications

Table J - Production of the Plan – Responsibility of Qualifying Body

Production and consultation on the 'Pre-Submission' (Draft) Neighbourhood Plan	Engagement
<p>A Parish/Town Council/Neighbourhood Forum publishes plan proposals for public consultation. This is the qualifying body's draft version of a Neighbourhood Plan, including draft policies and, if appropriate, site allocations. Background documents that have informed the Plan should also be published, and if required, a draft SEA should be published and consulted on, alongside the draft Plan.</p>	
<ul style="list-style-type: none"> • A public consultation on the Pre-Submission Plan, including draft SEA if required, for no less than 6 weeks. Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 (as amended) 	<ul style="list-style-type: none"> • Web-based consultation
<ul style="list-style-type: none"> • Notification: Statutory consultees will be notified, and a copy of the plan proposals will be sent to Rother District Council. 	<ul style="list-style-type: none"> • Written notifications

<ul style="list-style-type: none"> • Publicity: The qualifying body will publicise the Pre-Submission Plan and details of the consultation, in manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area 	<ul style="list-style-type: none"> • Public notices • Social media • Press releases / briefings • Posters / Leaflets
--	--

Table K - Submission and publication of the Neighbourhood Plan

Submission of the draft Plan and its publication by the Council	Engagement
<p>Having considered the consultation responses this is the final draft version of the Plan approved by the Town/Parish Council, or Neighbourhood Forum. It is submitted to the Council, together with supporting documents, including a consultation statement, 'basic conditions statement', and, where applicable, a SEA, to check completeness of the documents. Regulation 15 of The Neighbourhood Planning (General) Regulations 2012 (as amended)</p> <p>The Council will then publish the Submission Plan (and the SEA, where applicable) in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended)</p>	
<ul style="list-style-type: none"> • A public consultation on the Submission Plan, including draft SEA if required, for no less than 6 weeks. 	<ul style="list-style-type: none"> • Web-based consultation
<ul style="list-style-type: none"> • Notification: The Council will notify any consultation bodies who are referred to in the Consultation Statement. 	<ul style="list-style-type: none"> • Written notifications
<ul style="list-style-type: none"> • Publicity: The Council will publicise the Submission Plan together with supporting documents, including a consultation statement 'basic conditions statement', and, where applicable, a SEA and details of the consultation, and ask the qualifying body to do the same. 	<ul style="list-style-type: none"> • Public notices • My Alerts • Social media • Press releases / briefings • Posters / Leaflets
<ul style="list-style-type: none"> • Availability of documents: The Submission Neighbourhood Plan, including draft SEA if required, and all associated documents will be published on the Council's website. <p>The Council will work with the Qualifying Body to identify suitable deposit points for hardcopies of all relevant documents to be made available.</p>	<ul style="list-style-type: none"> • Publication on the Council's website • Making hard copy documents available

Table L - Independent Examination, Referendum and Making by the Council

Independent Examination of the Plan and Decision	Engagement
<p>Having collated and summarised all duly-made representations, the Council submits the Plan and supporting documents to the Examiner (who will have been appointed with the agreement of the qualifying body).</p> <p>In the event that the Examiner decides that a hearing is necessary, then relevant parties will be invited to present their views on the issues/policies which the Examiner believes need further, oral evidence.</p> <p>The Examiner will check that the Plan meets the basic conditions. If the plan does not, he/she may recommend changes. The Examiner will also assess whether the SEA meets the legal requirements and consider how it has informed the Plan.</p>	
<ul style="list-style-type: none"> The Council will publish the Examination documents, including any hearing statements, on its website. 	<ul style="list-style-type: none"> Publication on the Council's website
<p>On receipt of the Examiner's report, if the Council is satisfied that the basic conditions (with any recommended changes) are met, it will decide that the Plan can proceed to referendum. If not, the Council may propose alternative changes or reject the Plan. The decision to proceed (or not) to referendum will be publicised in a 'Decision Statement'.</p> <p>If the Examiner requires further material to be produced, this will also be published and may trigger further consultation.</p>	
<ul style="list-style-type: none"> Availability of documents: The Council's decision (the 'Decision Statement') will be published on the Council's website within five weeks of the publication of the Examiners report. Regulation 18 of The Neighbourhood Planning (General) Regulations 2012 (as amended) <p>The Council will work with the Qualifying Body to identify suitable deposit points for hardcopies of all relevant documents to be made available.</p>	<ul style="list-style-type: none"> Publication on the Council's website Making hard copy documents available
<ul style="list-style-type: none"> Publicity: The Council will publicise its decision on the Examiner's report, including how this decision can be inspected, within five weeks of the publication of the Examiners report. Regulation 18 of The Neighbourhood Planning (General) Regulations 2012 (as amended) 	<ul style="list-style-type: none"> Public notices My Alerts Social media Press releases / briefings
Neighbourhood Plan Referendum	Engagement
<p>Within 56 working days of the Council's decision (as published in the 'Decision Statement') to put a Neighbourhood Plan forward to referendum, the Council must arrange for the referendum to be held. A Qualifying Body can raise awareness of the referendum through publication of neutral publicity material.</p> <p>The process is similar to that of a local election, but subject to its own regulations. The Neighbourhood Planning (Referendums) Regulations 2012 (as amended)</p>	
<ul style="list-style-type: none"> The Council will make arrangements for the referendum and make all the information concerning the referendum, 	<ul style="list-style-type: none"> Publication on the Council's website

<p>including the referendum version of the Neighbourhood Plan and supporting documents, available to the public via its website, and made available for physical inspection at the Town Hall, Bexhill-on-Sea, as well as at any suitable locations identified through working with the qualifying body, no fewer than 28 days before the date of the referendum. (Regulation 4 of The Neighbourhood Planning (Referendums) Regulations 2012 (as amended))</p>	<ul style="list-style-type: none"> • Making hard copy documents available
<p>The Counting Officer is responsible for conducting the referendum.</p> <p>Eligible electors who are living within the neighbourhood area boundaries will be entitled to vote in the referendum. [*Usually, the referendum area is the area of the neighbourhood plan, unless it is amended by the Examiner.]</p>	
<ul style="list-style-type: none"> • Once the result of the referendum is declared by the Counting Officer, it will be made available on the Council's website. Regulation 42 of The Neighbourhood Planning (Referendums) Regulations 2012 (as amended) 	<ul style="list-style-type: none"> • Publication on the Council's website
<p>Making (adopting) the Neighbourhood Plan (Regulation 19 & 20)</p>	<p>Engagement</p>
<p>If more than 50 per cent of people voting in the referendum support the plan, then the Council must 'make' (adopt) the Plan within 8 weeks of the referendum. Regulation 18A of The Neighbourhood Planning (General) Regulations 2012 (as amended)</p> <p>A Plan comes into force following successful referendum and forms part of the Development Plan.</p>	
<ul style="list-style-type: none"> • Availability of documents: As soon as possible after deciding to 'make' the Neighbourhood Plan, the Council will publicise its decision on its website. <p>The Council will work with the Qualifying Body to identify suitable deposit points for hardcopies of all relevant documents to be made available</p>	<ul style="list-style-type: none"> • Publication on the Council's website • Making hard copy documents available
<ul style="list-style-type: none"> • Notification: As soon as possible after deciding to make the Neighbourhood Plan, the Council will notify the Qualifying Body and any person who asked to be notified of the decision. 	<ul style="list-style-type: none"> • Written notifications
<ul style="list-style-type: none"> • Publicity: The Council will publicise its decision to make the Neighbourhood Plan, including how and where this decision can be inspected. 	<ul style="list-style-type: none"> • Public notices • My Alerts • Social media • Press releases / briefings
<p>A post-adoption SEA Statement is required to be produced as soon as practicable after the decision to make the Plan (Regulation 16 of The Environmental Assessment of Plans and Programmes Regulations 2004)</p>	

- The post-adoption SEA Statement will be published on the Council's website.

- Publication on the Council's website

Advice and assistance in relation to Neighbourhood Planning

- 3.31 Up to the submission of the final draft (Submission) Neighbourhood Plan, it is the relevant Town or Parish Council (or Neighbourhood Forum) that is responsible for its preparation. However, the District Council must provide advice and support throughout the process in accordance with legislation¹⁴.
- 3.32 Over and above the functions set out in the previous section, the Council has appointed a Neighbourhood Planning Officer to support the production of Neighbourhood Plans by the following:
- Being the principal point of contact
 - Explaining the procedures involved with the preparation of a Neighbourhood Plan to an interested or existing qualifying body
 - Providing information, including environmental designations, to inform the preparation of a Neighbourhood Plan
 - Highlighting the relevant strategic policies of the Council
 - Advising on the need for, and undertaking early, Screening Assessments¹⁵
 - Identifying potential issues around compliance with the Local Plan and national policy
 - Providing feedback on emerging and draft Neighbourhood Plans and SEAs
 - Arranging the timely appointment of an external examiner
 - appointing a 'programme officer' to manage the examination process where a hearing is proposed by the appointed examiner
- 3.33 In accordance with the Neighbourhood Planning Act 2017, the Council, as local planning authority, will notify the qualifying body of relevant planning applications where a neighbourhood plan in force.

¹⁴ Section 6 of the Neighbourhood Planning Act 2017

¹⁵ The Council will also provide a Habitats Regulations Assessment Screening, where appropriate.

3.34 Further information about neighbourhood plans is viewable on the Council's ['Neighbourhood Plans'](#) webpage.

4. Development Management

- 4.1 This section sets out how the Council makes information on planning applications available to the public and how comments on such applications can be made. Reference to 'planning applications' here is taken to include all other associated applications, including those relating to listed buildings, advertisements, preserved trees and some 'prior notification'¹⁶ procedures and 'permission in principle' applications.
- 4.2 Consultation, publicity and notification on planning applications is carried out in accordance with the statutory requirements set out in the Town & Country Planning (General Development Procedure) (England) Order 2015 (as amended).
- 4.3 When undertaking consultations on planning applications, the Council will identify the relevant consultee groups on a case by case basis, which in addition to statutory consultees may also include the types of organisations set out in Figure 2.
- 4.4 Detailed guidance on what 'planning considerations' are, can be found on the Council's website at www.rother.gov.uk/planning.
- 4.5 The Council's current procedures for consultation, publicity and notification are set out in the following sections.
- 4.6 As noted earlier in this document, the conditions of the Coronavirus pandemic have impacted on the level of engagement and service that the Council would normally provide. Whilst these changes are temporary, it should be noted that any associated measures will likely remain as possible provisions in the event of any recurrence of such conditions in the future. Please see the temporary [Coronavirus Addendum](#) on the Council's website for further detail, including timescales for any of the temporary measures that are engaged. Please note the following measures in respect of Development Management:
- A temporary suspension of the requirement for local planning authorities to provide for the physical inspection of planning application documents if not reasonably practicable. Copies of these documents will continue to

¹⁶ Prior notification procedures relate to matters where no full planning application is necessary but where an applicant is required to submit information to the Council in advance of the development.

be placed on the Council's website.

- Where the conditions of the pandemic have had an impact on staffing levels and caseloads, the Council may temporarily suspend its discretionary pre-application service to prioritise its statutory duty to process planning applications.
- Between 4th April 2020 and 6th May 2021 the Coronavirus Act temporarily enabled Planning Committee to meet 'virtually' using online videoconferencing technology, where it was not practicable for the Committee to meet as normal.

Pre-application stage

- 4.7 Pre-application advice is a discretionary service offered by the Council¹⁷. Potential applicants are encouraged to seek advice from the Council on their proposals prior to formally submitting an application. There is a charge for this service. Full details of this service and the scale of charges can be found on the Council's website at <http://www.rother.gov.uk/article/8842/Pre-application-advice-and-fees>
- 4.8 Seeking pre-application advice helps to identify issues at an early stage with the view that they can be rectified before the application is submitted, thereby speeding up the application process. Advice on more straightforward proposals and householder applications will normally be provided in a letter. The planning officer may judge that more complex proposals would merit discussion at a meeting. Meetings are held wholly at the discretion of the Council. Such discussions may also usefully involve other agencies, such as the highways authority, and other Council officers such as those representing Housing or Environmental Health.
- 4.9 Where a proposal is for a major development¹⁸, or where the site is a sensitive one, or where the proposal is likely to cause significant controversy or where it will impact upon several people, potential applicants are encouraged to undertake publicity and consultation with the local community

¹⁷ Due to Covid-19 related issues and officer work pressures this service is currently suspended, but will be offered again in the future, in accordance with this section.

¹⁸ Major development is defined as that which relates to 10 or more new dwellings or a site area equal or greater than 0.5ha or other development with gross floorspace equal to or greater than 1,000sqm or site area equal to or greater than 1ha.

prior to the submission of the planning application.

- 4.10 This pre-application consultation process can serve to inform interested parties about the nature and scale of the proposals and forewarn the potential applicant of local concerns which may need to be addressed prior to submission. The Council will expect such consultations to be carried out at the applicant's expense and in a fair and inclusive manner which adds real value to the planning application process.
- 4.11 In addition to undertaking publicity and consultation, officers may recommend potential applicants to present their proposals as an adjunct to Planning Committee. Such a presentation would be chaired either by officers or the Committee Chairman, and would be open to other members, particularly those representing the affected ward(s), as well as Council officers outside of planning. This would be an opportunity for members to identify issues for the proposal to address, to highlight items of interest and to seek further information.

Availability of planning applications and statutory publicity

- 4.12 Details of all planning applications are posted on the Council's website <https://www.rother.gov.uk/planning-and-building-control/viewing-applications-decisions-and-appeals-online/>. The website is updated with any subsequent correspondence from the applicant, from statutory consultees or from other third parties. Applicants and other interested parties are therefore able to track the progress of an application directly via the website. The Council keeps under review opportunities to extend the amount of information held on the website, with the aim of maximising overall levels of accessibility.
- 4.13 A Weekly List of all applications is produced and is available on the website. In addition, the 'My Alerts' weekly email service identifies all planning applications as they are received, where the application sites are within 400 metres of the recipient's address.
- 4.14 The statutory publicity for planning applications is undertaken by the posting of a pink 'Planning Notice' on or adjoining each application site. The posting of a Notice is intended to advise immediate neighbours and the public generally of current applications. The initial statutory period of notification is normally 21 days, 14 days for permission in principle applications. The Notice gives the application reference, the description of development and

indicates where the application can be inspected.

- 4.15 Applications can be inspected at any time on the website, as well as via public access computers during normal office hours at the following premises:
- Bexhill Community Help Point, Town Hall, London Road, Bexhill-on-Sea, TN39 3JX
 - Battle Community Help Point, The Almonry, 43 High Street, Battle, TN33 0EA
 - Rye Community Help Point, 30a High Street, Rye, TN31 7JG¹⁹
- 4.16 Some types of applications must also be advertised in local newspapers, including all major applications and those affecting listed buildings or conservation areas. Details of applications which must be statutorily advertised in local newspapers appear in the Bexhill, Battle and Rye Observer and the Kent & East Sussex Courier²⁰. In addition, there is discretion to use a public notice in a newspaper to publicise an application which may have more widespread interest or implications.
- 4.17 Any comments on planning applications can be made during the consultation period through the link on the Council's website <https://www.rother.gov.uk/planning-and-building-control/> or be sent to planning@rother.gov.uk. Alternatively, comments may be forwarded in writing to the Head of Service Strategy and Planning at Rother District Council, Town Hall, Bexhill-on-Sea, East Sussex TN39 3JX. The Local Government (Access to Information) Act 1985 provides that letters submitted regarding a planning application cannot be confidential and must be made available for public inspection, however, personal data such as phone numbers and email addresses will be redacted. All comments received in relation to planning applications are scanned and posted on the website.
- 4.18 The Local Planning Authority also notifies each Parish or Town Council by email of planning applications or applications for listed building or conservation area consent, advertisement consent and applications for work to protected trees within their boundaries.
- 4.19 East Sussex County Council is consulted on applications affecting notified

¹⁹ The Rye Community Help Point is temporarily closed until further notice.

²⁰ In relation to application applications in Ticehurst parish only.

sites such as minerals consultation areas and waste consultation areas. Other service providers are also consulted on appropriate applications.

- 4.20 When plans are amended during an application or further information is submitted by the applicant the Council will use its discretion in terms of any re-notification necessary. The Council is likely to re-notify where there is a significant effect on third parties, or where the amendment is significant and beyond the terms of the original application. The type of notification would be proportionate to the significance of the amendment and level of local interest.

Planning Committee

- 4.21 The Council's Planning Committee, which comprises elected Members of the District Council, is held in public every four weeks. The Committee determines those applications not considered under the delegated authority to officers (see Scheme of Delegation below) and will generally consider the more major, complex or controversial planning applications.
- 4.22 The agenda of the Committee is available on the Council's website at least 5 days before each meeting at <http://www.rother.gov.uk/article/308/Planning-Committee>. A limited supply of copies for reference will be available for viewing at the meeting. The agenda includes reports on the individual planning applications being considered.
- 4.23 All comments relating to the application, which are received prior to the writing of the officers' report, are summarised within it and more complex correspondence may be copied in full and appended to the report. Committee Members consider the comments received when deciding on an individual application and all consultation responses and comments on planning applications can be viewed in full by Members on the Council's website. Any additional comments concerning an application on the agenda must be received by 9am on the Monday before the Thursday meeting if they are to be considered by the Planning Committee (date subject to change if committee is held on a different day).

- 4.24 Where the final decision for an application is to be taken by the Planning Committee, the Council allows the opportunity for the public to address the Committee, either for or against the application. As of amendments given approval by Full Council on 11 November 2019, members of the public are no longer required to have submitted a petition to address the committee. Instead, any person who has made a representation on an application to be decided at Planning Committee may register to address the Committee. Members of the public who intend to speak should register with Democratic Services by telephone on 01424 787811 or by email at Democraticservices@rother.gov.uk. Registration will start at 2pm on the date that the agenda is published (Wednesday) and close at 4pm on Monday of Committee week (space subject to availability).
- 4.25 The maximum number of speakers for and against the application by members of the public will depend upon the type of application – as set out below:
- Householder: 1 speaker each for and against
 - Minor/Other: 2 speakers each for and against
 - Major: 3 speakers each for and against
- 4.26 At the Planning Committee meeting, the application will be introduced by the Chairman and then by the Development Manager or the Planning Officer for the application. If relevant, a representative of the parish/town council will then be invited to speak. Following this, registered speakers will then be invited to address the committee; first speakers objecting to the application, and then speakers in support of the application including the applicant. Finally, a Council Ward Member not on the Planning Committee will be invited to address the committee on behalf of the public. Each speaker will have no more than five minutes to address the committee. Once each speaker has finished addressing the committee, Members of the Planning Committee will be given the opportunity to ask the speaker questions on the content of their speech.
- 4.27 For further details on Public Speaking at Planning Committee please see the Council's website at <http://www.rother.gov.uk/speakingatplanningcommittee>

- 4.28 As noted above, Ward Members are permitted to address the Planning Committee to make known the views of local residents as part of the consideration of a planning application. Members of the public can find contact details of their local Ward Members at:
<http://www.rother.gov.uk/article/6828/Who-is-my-councillor>

Scheme of Delegation

- 4.29 Most applications can be determined by the Head of Service Strategy and Planning under 'delegated authority'. Such applications are not reported to the Planning Committee.
- 4.30 Officers may consider it appropriate for a planning application to be determined by the Planning Committee where the proposal is of a large scale, or is a controversial scheme, or because it raises significant planning policy issues. Any Member can also request (using a procedure form setting out reasons) that a particular application be reported to Committee.
- 4.31 All applications relating to land in which the Council has an interest (and including that of serving Councillors and Officers, as well as anyone who is related to a Councillor or Officer) must be determined by the Planning Committee.
- 4.32 When a decision is delegated, a report is produced which summarises the consultation responses received, the officers' consideration of the issues and the intended decision, along with conditions. This report is retained on the planning application file and is published on the Council's website once the application has been determined.
- 4.33 As set out above, all comments received on an individual planning application, including those from statutory consultees, are posted on the Council's website as soon as possible after they are received.

Permission in Principle and Brownfield Land Registers

- 4.34 Permission in Principle (PiP) is an alternative way to obtain planning permission which only establishes the principle of development on sites.

- 4.35 Local planning authorities can grant permission in principle to a site upon receipt of a valid application or by entering a site in Part 2 of its Brownfield Land Register²¹ which will trigger a grant of PiP for that land providing the statutory requirements set out in [Town and Country Planning \(Permission in Principle\) Order 2017](#) (as amended) and the [Town and Country Planning \(Brownfield Land Register\) Regulations 2017](#) are met. Please see the [Council's Brownfield Land Register webpage](#) for more information, which includes a link to the Register. Please note that entering sites into Part 2 of the Brownfield Land Register is discretionary, and that as of 1 April 2021 the Council has not entered any sites into Part 2 of its Register.
- 4.36 Following a grant of PiP, the site must receive a grant of 'technical details consent' before development can proceed. The granting of technical details consent has the effect of granting planning permission for the development. Other statutory requirements may apply at this stage such as those relating to protected species or listed buildings. Technical details consent can be obtained following submission of a valid application to the local planning authority.
- 4.37 The consultation that must be undertaken before sites can be granted permission in principle is set out in the [Town and Country Planning \(Brownfield Land Register\) Regulations 2017](#) for suitable sites on Brownfield Land Registers, and in the [Town and Country Planning \(Permission in Principle\) Order 2017](#) (as amended) when permission in principle is sought by application. In both situations, local planning authorities must consult bodies identified in [Schedule 4 to the Town and Country Planning \(Development Management Procedure\) \(England\) Order 2015](#) if in their opinion the land within the site falls within the prescribed category, and take in to account any responses received. Local planning authorities must also consult anybody that they would have been required to [consult in relation to an application for planning permission](#).

²¹ [Regulation 3 of the Town and Country Planning \(Brownfield Land Register\) Regulations 2017](#) requires local planning authorities in England to prepare, maintain and publish registers of previously developed (brownfield) land. Registers comprise of two parts. Part 1 comprises all brownfield sites appropriate for residential development or residential-led development and Part 2 being those sites granted permission in principle.

- 4.38 During the process of seeking PiP through a valid application, the public, statutory consultees and other interested parties are consulted and have 14 days to respond, unless, in the case of statutory consultees, they agree a longer period in writing with the case officer.
- 4.39 The second stage (or technical details consent stage) is when the detailed development proposals are assessed. The publicity requirements for technical details consent applications mirrors the approach taken for planning applications.
- 4.40 The period for making comments will be set out within the relevant publicity notices which include the required notices on the site and on the Council's website. For site notices this will be not less than 21 days for Brownfield Land Register sites and 14 days for applications. For online notices, the same period of 14 days applies to permission in principle made by application or proposed through Brownfield Land Registers.²²
- 4.41 On the first publication of the Brownfield Land Register, where multiple sites may be proposed for a grant of permission in principle by entering them onto Part 2 of the register, statutory consultees should provide a substantive response to a proposal within 42 days. Thereafter, where statutory consultation is required in relation to a site proposed for a grant of permission in principle, statutory consultees have 21 days to respond to a proposal.
- 4.42 The Brownfield Land Register Regulations (2017) set out the publicity and consultation specifications for sites that are considered for a grant of PiP and then included in Part 2 of the Register. These specifications include:
- Publicise by site notice and on the Council's website for a period not less than 21 days, and
 - Notify relevant bodies if certain conditions apply, such as
 - if the site is within 10m of railway land,
 - specific requests that have been made by a Parish Council or neighbourhood forum,

²² The Housing and Planning Act (2016) requires that local planning authorities prepare, maintain and publish a register of brownfield land (also known as previously developed land) which the Council has assessed as being potentially suitable for residential development.

- those persons, bodies or authorities that fall within a category set out in the Table in Schedule 4 to the Town and Country Planning (Development Management Procedure) (England) Order 2015, or
- at the local planning authority's discretion, any other person, bodies or authority that the local planning authority considers should be informed.

Decision Notices

- 4.43 Parish and Town Councils are sent, by email, copies of the decision notices for the applications that fall within their area. All decision notices are posted on the website.

Feedback

- 4.44 The Council holds a Planning Agents' Forum around once a year to update local planning agents on recent or forthcoming changes and to receive feedback on the operation of the planning service.
- 4.45 A similar event takes place for Parish and Town Councils to exchange information on general planning matters.

Appeals

- 4.46 When a planning or other application is refused planning permission or consent, the applicant may choose to appeal against that decision and have the case considered by the Planning Inspectorate.
- 4.47 For an appeal which is being heard by means of written representations or by means of an informal hearing, the Council will send letters to all those who commented on the original planning application informing them of the appeal and inviting them to make any further submissions they may wish to the Planning Inspectorate.
- 4.48 For public inquiries, as well as informing any original objectors, an advertisement is also placed in the public notices section of a local newspaper and the applicant is required to place a notice on the appeal site.

4.49 For an appeal into an enforcement matter, the Council will aim to inform, by letter, those who may have an interest in the appeal and wish to express their view. This is the case whether the appeal is being heard by written representations, informal hearing or by public inquiry.

5. Monitoring and Reviewing of the Statement of Community Involvement (SCI)

5.1 The approaches set out in the SCI to inform and involve the community in planning policy preparation and the determination of planning applications will be monitored for their effectiveness. For engagement in respect of planning policy preparation, account will be taken of the overall number and types of participants involved as documents are progressed and any feedback received about the success or otherwise of the involvement techniques used.

5.2 Changes to the SCI may be instigated by further revisions of the Regulations which govern publicity and involvement in the planning policy preparation and planning application processes.

5.3 The Coronavirus pandemic has also shown that there are situations which may render some of the methods of engagement identified in the SCI as temporarily unpracticable. In response to such cases, it may be necessary for the Council to temporarily amend the details of the SCI, to identify where engagement is not possible and to set out any alternative forms of engagement, without the requirement for public consultation on these amendments in order that planning services can continue. Such temporary amendments may be set out in SCI addendum documents.

5.4 These changes will be reported on as part of the publication of the Local Plan Monitoring Report.

5.5 The Council will review the Statement of Community Involvement every five years as stated in Regulation 10A (1) (b) of The Town and Country Planning (Local Planning) (England) (Amendments) Regulations 2017²³.

²³ <http://www.legislation.gov.uk/ukxi/2017/1244/made>

Appendix A - Local Plan General and Specific Consultation Bodies

The Council is required to consult the below consultation bodies as part of Local Plan Regulation 18 and 19 stage consultations. In addition to the below bodies, the Council will also consult residents or other persons carrying on business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations.

General Consultation Bodies *(with examples where helpful)*

- (a) Voluntary bodies, some or all of, whose activities benefit any part of the local planning authority's area.
Nature Conservation / countryside bodies, Environmental groups, Infrastructure and service providers, Interest and amenity groups, Resident's Associations, Neighbourhood Plan Steering Groups, Learning agencies, Recreation bodies
- (b) Bodies which represent the interests of different racial, ethnic or national groups in the local planning authority's area,
- (c) Bodies which represent the interests of different religious groups in the local planning authority's area,
- (d) Bodies which represent the interests of disabled persons in the local planning authority's area.
Disabled groups, those with caring responsibilities groups
- (e) Bodies which represent the interests of persons carrying on business in the local planning authority's area;
Business Associations, Property Trade Associations, Voluntary Groups, Landowners

Specific Consultation Bodies *(with examples where helpful)*

- (a) The Coal Authority
- (b) The Environment Agency
- (c) Historic England (The Historic Buildings and Monuments Commission for England)
- (d) The Marine Management Organisation
- (e) Natural England
- (f) Network Rail Infrastructure Limited,
- (g) Highways England (a strategic highways company)

(h) A relevant authority any part of whose area is in or adjoins the local planning authority's area.

Local Planning Authorities, County Councils, Parish Councils, the Police and Crime Commissioner, and neighbourhood forums.

(i) Any person—

i. to whom the electronic communications code applies by virtue of a direction given under section 106 (3)(a) of the Communications Act 2003, and

ii. who owns or controls electronic communications apparatus situated in any part of the local planning authority's area.

Openreach, BT, etc

(j) If it exercises functions in any part of the local planning authority's area—

i. a clinical commissioning group established under section 14D of the National Health Service Act 2006; and the National Health Service Commissioning Board.

ii. A person to whom a licence has been granted under section 6(1)(b) or (c) of the Electricity Act 1989

iii. A person to whom a licence has been granted under section 7(2) of the Gas Act 1986

iv. A sewerage undertaker; and
Southern Water

v. A water undertaker;
Southeast Water

(k) The Homes and Communities Agency

Appendix B - Neighbourhood Plan Consultation Bodies

The Qualifying Body and the Council are required to consult the below consultation bodies as part of Neighbourhood Plan Regulation 14 and 16 stage consultations, respectively.

Consultation Bodies *(with examples where helpful)*

- (a) A local planning authority, county council or parish council any part of whose area is in or adjoins the area of the local planning authority;
- (b) The Coal Authority
- (c) The Homes and Communities Agency
- (d) Natural England
- (e) The Environment Agency
- (f) Historic England (The Historic Buildings and Monuments Commission for England)
- (g) Network Rail Infrastructure Limited
- (h) Highways England (a strategic highways company)
- (i) The Marine Management Organisation
- (j) Any person—
 - i. to whom the electronic communications code applies by virtue of a direction given under section 106 (3)(a) of the Communications Act 2003, and
 - ii. who owns or controls electronic communications apparatus situated in any part of the local planning authority's area.
Openreach, BT, etc
- (k) Where it exercises functions in any part of the neighbourhood area—
 - i. a clinical commissioning group established under section 14D of the National Health Service Act 2006; and the National Health Service Commissioning Board.
 - ii. A person to whom a license has been granted under section 6(1)(b) or (c) of the Electricity Act 1989
 - iii. A person to whom a license has been granted under section 7(2) of the Gas Act 1986
 - iv. A sewerage undertaker; and
Southern Water

- v. A water undertaker;
Southeast Water
- (l) Voluntary bodies some or all of whose activities benefit all or any part of the neighbourhood area;
Nature Conservation / countryside bodies, Environmental groups, Infrastructure and service providers, Interest and amenity groups, Resident's Associations, Neighbourhood Plan Steering Groups, Learning agencies, Recreation bodies
- (m) Bodies which represent the interests of different racial, ethnic or national groups in the neighbourhood area;
- (n) Bodies which represent the interests of different religious groups in the neighbourhood area;
- (o) Bodies which represent the interests of persons carrying on business in the neighbourhood area.
Business Associations, Property Trade Associations, Voluntary Groups, Landowners
- (p) Bodies which represent the interests of disabled persons in the neighbourhood area.
Disabled groups, those with caring responsibilities groups

Appendix C - Glossary of Abbreviations

CIL – Community Infrastructure Levy

DtC – Duty to Cooperate

LDS – Local Development Scheme

NP – Neighbourhood Plan

PiP – Permission in Principle

SA - Sustainability Appraisal

SEA - Strategic Environmental Assessment

SCI – Statement of Community Involvement

SPD – Supplementary Planning Document

SoCG – Statement of Common Ground

2021 Update to the Statement of Community Involvement

Consultation Summary Report

The draft updated Statement of Community Involvement (SCI) 2021 was the subject of a six-week public consultation between the dates of 11 June to 23 July 2021. It is not a statutory requirement for SCIs to be subject to public consultation, however the Planning Practice Guidance (PPG) notes that it is considered good practice keep communities informed and to provide notification of the Council's intention to update the SCI - as well as to give key partners, stakeholders and members of the public the opportunity to comment on any proposed changes. In addition, the Council's existing SCI commits it to public consultation on the SCI itself.

How the consultation was undertaken

During this consultation period, the draft updated SCI was published on the Council's website. The publication of the draft document is ongoing.

Due to temporary changes to legislation, which are reflected in the PPG as well as the Council's temporary [Coronavirus Addendum to the SCI](#), it was considered that it would not be appropriate to make a hard copy of the draft document available at the Council's offices. It was published that in the situation that an individual was unable to access the document digitally, that that individual should contact the Planning Policy Team by telephone in order to make alternative arrangements to view the document.

450 organisations and individuals from the Council's Planning Policy consultation database were notified of the consultation and were invited to make comments. These included organisations that would be notified as part of statutory planning policy consultations, as well as other groups and individuals who had requested to be kept informed of planning policy consultations. Of these notifications, 414 were sent via email, with 36 sent by post.

Summary of representations received

In total, representations were received from 12 organisations, and the following topics were raised:

- Concern that the increased use of online engagement methods may exclude members of the community who have limited or no online capabilities, as well as more isolated rural communities.
- Certain groups, especially those that are not statutory consultees, sought clarification that they would be consulted throughout the Local Plan and Neighbourhood Plan development process.
- That certain key issues (for example, highways and the historic environment) require a systematic and broad engagement throughout all stages of the planning process.

- Some groups expressed concern that they be consulted on planning applications (notably on major applications) where their involvement may be pertinent, and sought clarity from the SCI in this regard. This was particularly the case for organisations where their involvement is not ensured by statutory requirements.
- The value of pre-application consultation was discussed.
- Wording suggestions, including points of clarification
- General comments
- Comments of support, including the Council's approach to the 'Duty to Cooperate' and cross boundary working.

A full list of consultations received, including the Council's responses and intended actions can be found in Appendix A.

Appendix A – Table of Responses

Representation	Respondent	Summary of Issue	RDC Comments	RDC Proposed modifications
1	Natural England	We are supportive of the principle of meaningful and early engagement of the general community, community organisations and statutory bodies in local planning matters, both in terms of shaping policy and participating in the process of determining planning applications. No further comments	Noted. The Council welcomes Natural England's comments of support.	No changes required.
2	Coal Authority	Rother District Council's area lies outside the defined coalfield and therefore the Coal Authority has no specific comments to make on your Local Plans / SPDs etc.	Comments are noted, this therefore confirms that we will not consult the Coal Authority on Local Plan matters.	No changes required.
3	Rye Town Council	Neighbourhood Plans involve significant local consultation and local democracy. They provide an unrivalled opportunity for communities to influence forward development planning.	Noted. Rother District Council supports neighbourhood plans coming forward to sit alongside the Local Plan process.	No changes required.
4	Rye Town Council	Consultation should work in all directions. It is important that organisations tangential to the democratic system - such as Alliance Homes and Rye Partnership - consult local councils.	This is acknowledged; however the Council's Statement of Community Involvement only concerns the engagement and consultation responsibilities of the Council.	No changes required.
5	Rye Town Council	In all consultations, it is important not to forget the digital divide and to adopt methods and processes that include those who are 'digitally challenged'.	This is acknowledged. While the Council intends to implement new online and digital technologies as opportunities for a wider public engagement, these methods are intended to augment the current scope of public engagement and will not be used to replace or take away from any existing methods of engagement.	No changes required.

Representation	Respondent	Summary of Issue	RDC Comments	RDC Proposed modifications
6	High Weald AONB Unit	<p>The Unit welcomes the reference to the High Weald AONB Joint Advisory Committee in Group D of Figure 2 in paragraph 3.17. However it would appear that this table only relates to Local Plans. The High Weald AONB JAC is not mentioned in the sections on Development Management or Neighbourhood Plans.</p> <p>Whilst it is accepted that we are not statutory consultees, our advice on planning applications and neighbourhood plans can help the District Council and Neighbourhood Planning Groups to meet their duties under section 85 of the Countryside and Rights of Way Act 2000 to have regard to the purpose of conserving and enhancing the AONB when making any decisions that affect it.</p> <p>I would ask that you make it clear in the SCI that the District Council commits to consulting the High Weald AONB JAC on major planning applications and will encourage Neighbourhood Planning Groups to consult us on their neighbourhood plans.</p>	<p>Noted.</p> <p>This section details the Council's engagement responsibilities for all documents pertaining to Planning Policy, including Local Plans related documents and Neighbourhood Plans. While the High Weald AONB Unit is not a 'statutory consultee' in that it is not specifically named within the Regulations (Local Plan or Neighbourhood Plan), the Council is required to consult the High Weald AONB JAC as they would come under "general consultation bodies" within the Local Plan Regulations and under "voluntary bodies some or all of whose activities benefit all or any part of the neighbourhood area" with respect to the Neighbourhood Plan Regulations. Figure 2 sets out the different groups that the Council is required to consult under both Local Plan and Neighbourhood Plan Regulations, and the High Weald AONB Unit is cited as an example.</p> <p>It is acknowledged that the Council may, when considering planning applications, want to consult groups other than those designated as statutory consultees, including the High Weald AONB JAC. Consultees are decided on a case by case basis, depending on the nature of the application.</p>	<p>In addition to stating "general and specific consultation bodies" within para 3.16, also include "consultation bodies" as set required by the Neighbourhood Plan Regulations.</p> <p>Under paragraph 4.2 add an additional paragraph stating "When undertaking consultations on planning applications, the Council will identify the relevant consultee groups on a case by case basis, which in addition to statutory consultees may also include the types of organisations set out in Figure 2."</p>
7	Tunbridge Wells BC	<p>Para 2.9: where it is stated "The Council is obliged to consider, firstly, conformity with local planning policies, consistency with national policies, as well as having regard to all material considerations (which may pull in different directions) in making decisions" – consider adding in the word 'balanced' to "...making decisions" to read 'making balanced decisions'</p>	Agree	<p>Para 2.9 - add the word "balanced" to "...making decisions" in order to read "making balanced decisions"</p>
8	Tunbridge Wells BC	<p>Para 3.3: worth noting that the new Local Plan once adopted will supersede the documents set out in para. 3.2 of the SCI</p>	Agree	<p>Para 3.3 - add the clarification that "The New Local Plan will supersede the documents listed above in paragraph 3.2, as well as any made Neighbourhood Plan that forms part of the Development Plan for the period up to 2028."</p>
9	Tunbridge Wells BC	<p>Para 3.7: it is set out here that once 'made' Neighbourhood Plans become part of the Local Plan – this should be the Development Plan rather than Local Plan</p>	Agree	<p>Para 3.7 - Change reference from 'Local Plan' to 'Development Plan'</p>
10	Tunbridge Wells BC	<p>Page 32, table H: it would be of assistance if 'Neighbourhood Forum' is defined/explains what is meant by this;</p>	Agree	<p>Page 32, table H - Provide an explanation in footnote regarding the definition 'Neighbourhood Forum'</p>

Representation	Respondent	Summary of Issue	RDC Comments	RDC Proposed modifications	
11	Tunbridge Wells BC	Para 5.1: relating to monitoring and review this paragraph covers the involvement of the community in planning policy preparation. It is suggested that additional wording be included so that it also covers the involvement of the community in the determination of planning applications - which para 1.3 of the Introduction section of the SCI explains the SCI seeks to do.	Agree	Para 5.1 - add additional wording to include community participation as part of the determination of planning applications as well as planning policy preparation.	
12	Marine Management Organisation	We would like to be kept in the loop with any future consultations and we are happy to be engaged throughout the entire process. We are looking forward to seeing the development of the new local plan. Please keep in mind our marine plans throughout the development process with anything relevant to the marine environment and align with our policies, for example infrastructure is mentioned online as a main focus and therefore you could link this area to our policies.	The Council will ensure that the MMO policies will be taken account of in the development of the Local Plan.	No changes required.	
13	Southern Water	We would like to take this opportunity to remind Rother District Council although Southern Water is not a statutory consultee on Planning Applications, Southern Water would encourage Rother to consult us on all major developments, so that we are able to request planning conditions if necessary. These planning conditions or advisories will help facilitate the delivery of necessary sewerage infrastructure in parallel with new development. We can be consulted on Planning Applications at southernwaterplanning@southernwater.co.uk.	It is acknowledged that the Council, when considering planning applications, may want to consult groups other than those designated as statutory consultees, including Southern Water. Consultees are decided on a case by case basis, depending on the nature of the application.	Under paragraph 4.2 add an additional paragraph stating "When undertaking consultations on planning applications, the Council will identify the relevant consultee groups on a case by case basis, which in addition to statutory consultees may also include the types of organisations set out in Figure 2."	
Page 77	14	Wealden DC	Paragraphs 3.4 to 3.5, Pages 10-11 – Wealden District Council (WDC) supports Rother District Council (RDC) in their process of recording and evidencing their engagement with neighbouring local planning authorities at an early stage and we can confirm that WDC is doing the same. WDC also supports RDC in their proposed action of publishing a series of draft Statements of Common Ground (SoCG) or Statements of Intent, in advance of their formal Regulation 18 Local Plan consultation stage. WDC will work with RDC to achieve this.	Noted. The Council welcomes Wealden's comments of support.	No changes required.
	15	Wealden DC	Table A, Page 21 – WDC supports RDC in its proposed actions on duty to cooperate matters included at Table A, which includes informal consultation on a Duty to Cooperate Action Plan and other early engagement documents, regular meetings and conference calls with neighbouring local planning authorities and providing regular representation on working groups dealing with strategic cross boundary matters. WDC will continue to hold regular meetings with RDC to discuss strategic cross boundary matters that pertain to both local authorities.	Noted. The Council welcomes Wealden's comments of support.	No changes required.

Representation	Respondent	Summary of Issue	RDC Comments	RDC Proposed modifications
16	Historic England	It will be important to ensure that stakeholder organisations with interests and responsibilities in the historic environment, at national and local levels, are fully involved throughout the consultation process. To this end, it is important to consult with both the Council's own conservation officer or team, the County archaeological adviser and local amenity societies.	<p>Noted.</p> <p>Figure 2 of the draft SCI identifies that both local (including local conservation groups) and national organisations will be involved in all statutory consultations, where they relate to definition of 'general consultation bodies' under the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), or 'consultation bodies' under the Neighbourhood Planning (General) Regulations 2012 (as amended). For further detail please see Appendix A and B of the SCI.</p> <p>Paragraph 4.2 of the Development Management section, clarifies that the consultation, is carried out in accordance with the statutory requirements set out in the Town & Country Planning (General Development Procedure) (England) Order 2015 (as amended). Any consultation in addition to statutory requirements would be determined on a case by case basis. The section on the pre-applications also identifies consultation may be carried out at this stage, including discussion with other Council officers where relevant.</p>	Under paragraph 4.2 add an additional paragraph to state: "When undertaking consultations on planning applications, the Council will identify the relevant consultee groups on a case by case basis, which in addition to statutory consultees may also include the types of organisations set out in Figure 2."
17	Highways England	<p>Section 2: The consultation charter presented at paragraph 2.2 is supported per se and is consistent with Highways England's own general approach to consultations.</p> <p>The commitment to retain and refine use of tools such as online consultation which have taken a greater role due to the Covid-19 Pandemic (para 2.6) is welcomed and supported.</p>	Noted. The Council welcomes Highways England's comments of support.	No changes required.
18	Highways England	<p>Paras 3.4 and 3.5 (which reference the "duty to co-operate"): We affirm Highways England's desire to participate fully in this process, in any matters where the safe and efficient operation of the Strategic Road Network (SRN) may be impacted by proposals and/or allocations within the emerging Rother Local Plan.</p> <p>It is noted subsequently within the footnotes of page 21 that the government white paper "Planning for the Future – August 2020" has proposed removing the Duty to Co-operate as a formal requirement of the Local Plan preparation process. Regardless of any changes to the legal requirement under the Localism Act, it will remain a statutory requirement to consult Highways England regarding any plans, proposals or programmes that may impact on the safety, reliability and/or operational efficiency of the SRN. Moreover, we consider that it is essential to the success of the current emerging and future local plans that appropriate cross-boundary working occurs, and recommends that this should be made more explicit for topics (such as transport) where the need is greatest.</p>	<p>Noted. Footnote 7 on page 21 also states that its is likely that activities relating to the Duty to Cooperate will continue.</p> <p>Table A of the SCI is intended to set out the various forms of engagement that will be carried out as part of the 'pre-production' stage of Local Plan development, including examples of potential activities and groups. Specific discussion in respect of intended Duty to Cooperate programs and partners is set out in the Council's 'Engagement Strategy'.</p>	No changes required.

Representation	Respondent	Summary of Issue	RDC Comments	RDC Proposed modifications
19	Highways England	Figure 1 (para 3.15) sets out the different types of local plan documents and the type of consultation which legislation requires to be undertaken for each. We will expect to be consulted on all documents listed under “statutory consultation”. Additionally, where the Infrastructure Delivery Plan (IDP) includes proposals which directly affect or about the SRN, we will also expect to be consulted with regard to those proposals as part of the IDP preparation process.	It is acknowledged that consultation on the Infrastructure Delivery Plan (IDP) will be required in respect of specific organisations where proposals within the IDP may impact upon areas of concern relevant to those organisations.	Within Figure 1, move IDP within the section headed 'Documents where public consultation is a Council requirement' while noting that this is only in respect of specific consultees where relevant, such as Highways England in cases where IDP proposals may impact upon the SGN.
20	Highways England	Figure 2 (para 3.17) lists Highways England as a “National Organization or Agency”. Whilst this is indeed a valid categorisation of Highways England’s role, it is noted that, due to the inherent “cross boundary” nature of strategic traffic movement, Highways England should also be recognized as a necessary collaborative body (category D).	Noted. However, named organisations are here given as examples and should not therefore be read as either exhaustive or comprehensive in terms of identifying organisations. In addition, the categories within Figure 2 are not necessarily mutually exclusive. For example, Highways England's inclusion within Category E as a "National Organisation or Agency" does not functionally exclude Highways England from being considered in its capacity as a collaborative body also. In any case, the consultee groups identified in Figure 2 would all be consulted as part of a statutory planning policy consultation, and therefore no group would be missed out.	Add footnote to clarify that organisations specifically named within Figure 2 are examples of organisations within the identified group categories.
Page 79 21	Highways England	We should be consulted on any supplementary development plans or neighbourhood plans that could impact on the safety, reliability and/or operational efficiency of the SRN.	Noted. It is has already been identified that consultation on Neighbourhood Plans and SPDs are a statutory requirement, and that Highways England are identified as a statutory consultation body as set out in Figure 2.	No changes required.
22	Highways England	Section 4 of the SCI details the Council’s proposed approach and processes to be undertaken in respect of planning applications for sites within their area of control. Highways England is content that these are in accordance with established processes for formal consultation and will apply standard response procedures and formats accordingly. However, at the practical level, officers sometime miss the need to consult us on applications that lie immediately adjacent to the SRN. For example, even a side extension in proximity to an SRN embankment could have implications for us if the foundations mean changes to the embankment profile or it drainage. Or sporting venues per se, or other developments with floodlights, or car parking creating dazzle or distraction could create hazards needing assessment. Or structures such as telecom installations or advertising hoardings may need structural details to be agreed to manage any risk of structural failure impacting on the SRN.	Noted. This issue will be communicated with the Development Management Team. Paragraph 4.2 of the Development Management section, clarifies that the consultation, is carried out in accordance with the statutory requirements set out in the Town & Country Planning (General Development Procedure) (England) Order 2015 (as amended). Any consultation in addition to statutory requirements would be determined on a case by case basis.	Under paragraph 4.2 add an additional paragraph to state: "When undertaking consultations on planning applications, the Council will identify the relevant consultee groups on a case by case basis, which in addition to statutory consultees may also include the types of organisations set out in Figure 2."

Representation	Respondent	Summary of Issue	RDC Comments	RDC Proposed modifications	
23	Highways England	RDC should ensure that relevant information provided by applicants at the pre-planning stage is shared with Highways England, either directly or via the appropriate Local Highway Authority.	The Council's pre-application service is a discretionary service. However, Paragraphs 4.6 - 4.7 under the heading 'Pre-application Stage' do identify that consultation may be carried out at this stage, and states that this may include discussion with the Highways Authority where relevant. Where this is not a statutory requirement, consultation will be carried out at the discretion of the case officer.	No changes required.	
24	Etchingham PC	3.2 The DaSA must be compiled by involving local knowledge even when a Neighbourhood Plan does not exist or could be considered out of date.	Parish Councils and local groups will be consulted and engaged as part of the preparation of the New Local Plan.	No changes required.	
25	Etchingham PC	3.2 Consideration should be given to 'mobile' exhibitions to reach rural areas poorly served by public transport and where internet connection is still unreliable and bandwidth is a constant issue.	Noted. This is included under the heading 'Exhibitions, Workshops and Presentations' within Figure 3.	No changes required.	
26	Etchingham PC	Neighbourhood Plans are a huge task for a small community reliant again on volunteers sadly an aspiration rather a real possibility in many places.	Comments noted.	No changes required.	
Page 80	27	Etchingham PC	4.6 Pre-application advice is key to an efficient and smoothly run system. Get it right the first time.	Noted. While pre-application advice is not a statutory requirement, the Council does offer this as a discretionary service.	No changes required.
	28	Etchingham PC	4.8 The definition of a major development should be appropriate to the locality, not a single one-size fits all algorithm.	Noted, however major development in Paragraph 4.8 is defined by the National Planning Policy Framework as set out in footnote 14.	No changes required.
	29	Etchingham PC	When Parish Councils are consulted, quite rightly, on local planning applications allowance should be made for the meeting schedules, most seem to be monthly at best so calling an EGM regularly to cover this eventuality is not appropriate. Approximate Decision Dates should at least be beyond the deadline date for response by Parish Councils.	Noted, however durations for decision dates are set out by Article 34 of the Town and Country Planning (Development Management Procedure) (England) Order 2015	No changes required.

Representation	Respondent	Summary of Issue	RDC Comments	RDC Proposed modifications
30	The British Horse Society	On behalf of the British Horse Society, I would like to say that we would wish to be involved as stakeholders in regard to issues relating to open space, public rights of way, permissive paths and any proposed cycle tracks as well as planning applications which are likely to impact in any way on the aforementioned areas.	<p>The British Horse Society are on the Council's mailing list in respect of planning policy so they will be notified in respect of relevant planning policy consultations.</p> <p>Paragraph 4.2 of the Development Management section, clarifies that the consultation, is carried out in accordance with the statutory requirements set out in the Town & Country Planning (General Development Procedure) (England) Order 2015 (as amended). Any consultation in addition to statutory requirements would be determined on a case by case basis.</p>	Under paragraph 4.2 add an additional paragraph to state: "When undertaking consultations on planning applications, the Council will identify the relevant consultee groups on a case by case basis, which in addition to statutory consultees may also include the types of organisations set out in Figure 2."

This page is intentionally left blank

Rother District Council

Report to:	Cabinet
Date:	4 October 2021
Title:	Battle Civil Parish Neighbourhood Plan 2019-2028
Report of:	Ben Hook, Director of Place and Climate Change
Cabinet Member:	Councillor Jonathan Vine-Hall
Ward(s):	Battle
Purpose of Report:	To confirm the result of the recent Neighbourhood Plan Referendum for the civil parish of Battle.
Decision Type:	Non-Key
Officer	
Recommendation(s):	Recommendation to COUNCIL: That the Battle Civil Parish Neighbourhood Plan 2019 - 2028 incorporating the Examiner's modifications, as presented to local Referendum, be 'made' with immediate effect and form part of the Council's Development Plan.
Reasons for Recommendations:	To enable Rother District Council to "make" the Plan so that it will become part of the statutory 'development plan' for the area.

Introduction

1. Following a successful local Referendum result in relation to the use of the Battle Civil Parish Neighbourhood Plan (BCPNP) to help in the determination of planning applications in the Parish Neighbourhood Area, this report recommends that it be formally 'made' (adopted) and become part of the statutory Development Plan for the area.

Background

2. Battle Town Council, as the Qualifying Body (QB), applied for Battle Civil Parish to be designated a Neighbourhood Area under Part 2 of the Neighbourhood Planning (General) Regulations 2012. The area was designated on 13 April 2015.
3. Following consultation on a draft (pre-submission) Plan, the BCPNP was submitted to the District Council in January 2020. The BCPNP and its supporting documents were publicised and representations invited. The period of formal consultation ran from 20 January – 1 March 2020. Independent examination followed and the Examiner, Mr John Slater published his report in May 2021, concluding that the BCPNP, subject to certain modifications proposed in his report, meets the basic conditions as set out in legislation, is

compatible with Schedule 4B of the Town and Country Planning Act 1990 and could therefore proceed to local referendum.

4. On 2 July 2021, the District Council resolved that the Neighbourhood Plan – Submission Plan (as amended in line with the Examiner’s proposed modifications) should proceed to local Referendum. This decision and a revised version of the BCPNP, agreed by Battle Town Council, was published on Rother District Council’s website. The ‘referendum area’ was determined to be Battle Civil Parish as recommended by the Examiner.

Referendum

5. A Referendum was held on 16 September 2021. The referendum question was

‘Do you want Rother District Council to use the Neighbourhood Plan for Battle to help it decide planning applications in the Neighbourhood Area?’

6. The results of the referendum were:

Yes = 1127
No = 138
Unmarked or Void = 5

Number of Votes = 1265
Turnout = 24%

Conclusion

7. Paragraph 38A(4)(a) of the Planning and Compulsory Purchase Act 2004 requires the Council to ‘make’ a Neighbourhood Plan if more than half of those voting in a referendum have voted in favour of the Plan being used to help to decide planning applications in the area. This needs to be achieved within eight weeks of the referendum result.
8. The Council has also assessed and concluded that the Plan, including its preparation, does not breach and would not otherwise be incompatible with any EU obligation or any of the Convention rights (within the meaning of the Human Rights Act 1998). This includes compliance with the newly introduced basic condition regarding compliance with the Habitat Regulations.
9. Therefore, it is proposed that full Council be recommended to formally ‘make’ the BCPNP with immediate effect. This will bring it into legal force. An extraordinary meeting of full Council has been convened to take place on Monday 18 October 2021 for this purpose and to meet the prescribed timescales.
10. The principal effect of this is that it will become part of the statutory ‘development plan’ for the area. Hence, planning applications within Battle Civil Parish will be determined against the BCPNP, alongside relevant Local Plan policies, also having regard to the National Planning Policy Framework.
11. A specific outcome to be noted is the fact that the development boundary for Battle as defined in the 2006 Rother District Local Plan will be superseded by that in the BCPNP.

12. The decision to make the BCPNP will need to be publicised and notified to those who had asked to be advised. A statement setting out how environmental considerations have been integrated into the Plan also needs to be published and consultees informed. This statement will set out that the Strategic Environmental Assessment for the BCP NP has also been adopted and will form part of the Local Development Plan for RDC.

Financial Implications

13. There are no financial implications for the proposals within this report.

Legal Implications

14. Compliance with relevant NP legislation is detailed within the report.
15. There is an opportunity for legal challenge in the event of perceived failures in these respects, but the Council and the independent Examiner, as well as the Town Council, has been careful to ensure due process has been followed.

Human Resources Implications

16. There are no Human Resource implications for the proposals within this report.

Risk Management

17. The making of a Neighbourhood Plan is a requirement, with very limited exemptions, once it has been supported by a local referendum. The Council needs to be satisfied that all the 'basic conditions' are met and that the Plan has been properly prepared.

Other Implications	Applies?	Other Implications	Applies?
Human Rights	No	Equalities and Diversity	No
Crime and Disorder	No	External Consultation	No
Environmental	Yes	Access to Information	No
Risk Management	Yes	Exempt from publication	No

Report Contact Officer:	Julia Edwards Senior Planning Officer
e-mail address:	julia.edwards@rother.gov.uk
Appendices:	None
Relevant Previous Minutes:	None
Background Papers:	None
Reference Documents:	None

This page is intentionally left blank

Rother District Council

Report to:	Cabinet
Date:	4 October 2021
Title:	Results of Customer Survey
Report of:	Joe Powell
Cabinet Member:	Councillor Susan Prochak
Ward(s):	All
Purpose of Report:	To update Members on the progress of the development of a Corporate Customer Service Strategy and mark National Customer Service Week 2021 (NCSW) with an initial summary of the results of a recent customer survey and internal staff and Member survey, conducted in partnership with the Institute of Customer Services.
Decision Type:	Non-Key
Officer	
Recommendation(s):	It be RESOLVED : That the results of the recent customer survey and internal staff and Member survey conducted in partnership with the Institute of Customer Services be noted.
Reasons for Recommendations:	The survey results will help us identify our objectives for the new Corporate Customer Service Strategy, as part of the Corporate Plan priority objective to be a more open Council and place customers at the heart of everything we do. The customer survey results will also be used to compare our present customer service performance to that of other local authorities and benchmark future performance monitoring.

Introduction

1. Rother is now a member of the Institute of Customer Service (ICS) and we have teamed up with them to develop a new Corporate Customer Service Strategy and campaign to transform our approach to serving the public: putting customers at the heart of everything we do. The ICS will provide us with the guidance and support we need to develop a strategy that can build on our existing customer service standards. The ICS will also assist with the delivery of the strategy and enable us to achieve the transformational change required to put customer experience at the heart of all the services we deliver.

2. In recognition of National Customer Service Week (NCSW) we are bringing before Members an initial summary of the responses received from two recent surveys. On the 8 September 2021 the first survey was directed at 4,000 residents that had recently been in contact with the Council through the various communication channels available. The customer contact details were drawn from a range of Council services, approximately proportionate to the level of customer contact that service area receives.
3. The survey sought to understand from customers the experience they had when engaging with the Council and their levels of satisfaction. A total of 527 survey responses were received which exceeds the 10% response target from the 4,000 survey invitations sent. A copy of the external customer survey can be found at Appendix A.
4. On the 13 September 2021 the second survey was directed at internal colleagues and Members to understand what value we place on the customer experience as an organisation. A copy of the internal staff and Member survey can be found at Appendix B.
5. An initial summary of the survey results and a narrative of the implications of these will be forwarded as Appendix C as soon as possible. The survey results will be compared to the standards of other local authorities so that we can identify how we are performing. In addition, the survey results will provide a benchmark for our current customer service performance and allow us to monitor our progress as we develop and then implement a Corporate Customer Service Strategy.
6. The main purpose of the two surveys is to identify where we are effective at meeting the needs and expectations of our customers and where we need to improve. The areas for improvement will inform the objectives of the Corporate Customer Service Strategy that we will now develop and bring to Overview and Scrutiny Committee for consideration in early 2022. The ICS will continue to provide us with the guidance and support we need to develop a strategy that can build on our existing customer service standards and improve our performance. The ICS will also assist with the delivery of the strategy and enable us to achieve the transformational change required to put customer experience at the heart of all the services we deliver

Strategy Development

7. The Corporate Customer Service Strategy will support the Council to achieve its vision, stated within the Corporate Plan: to provide our customers with the best experience possible, putting them at the heart of everything we do. In order to realise this vision, the Council will need to make changes to the way it delivers many of its services. The strategy will enable the Council to set its aims and objectives and enable it to embark upon the programme of cultural transformation required to achieve these aims and objectives and realise its vision. While the programme of cultural transformation envisaged is likely to take time to fully realise, the strategy will identify quick wins as well as short and

medium-term objectives, setting clear targets and measures for quantifying the level of our success.

8. The development of the strategy will require a more detailed review of the results of the two surveys and be used to inform how we will achieve our aims. We know from the advice and guidance already received from the ICS to date, that for the strategy to be effective it will need to introduce transformational change to our **strategic approach**; review and improve our internal and external **processes** and empower our **people** with the training and resources they need to be more effective.
9. We will need to develop a strategy that is dynamic and flexible enough to allow us to manage our customers' expectations and achieve the best service outcome our resources and various legal duties will allow. We know that customers value having their expectations met and that different customers have different expectations. Customer expectations may vary depending on the nature of their transaction with the Council as well as a range of other factors that will need to be considered, including the age of the customer or their socio-economic group, for example.
10. We will not be able to achieve our aims and objectives alone and a new strategy will need to have partnership focus, to identify roles and responsibilities of the full range of internal and external stakeholders, including our customers themselves. In this way we will ensure that our corporate strategies, processes and people are maximising the support and resources of the wider public sector, as well as local businesses, community groups and voluntary sector organisations.
11. The draft strategy that we will bring forward to Cabinet will also quantify the value of the Council investment in becoming a more customer focused organisation. These value metrics will also provide us with the performance measures we need to monitor and continuously improve our customer service standards across the whole organisation now and into the future.
12. Officers have begun to form an internal group of key internal stakeholders that will lead the development of the strategy proposals and the internal and external communication approach. The group will then lead and oversee the implementation of the strategy action plan.

Conclusion

13. The results of the two surveys will now be used to inform the development of a draft Corporate Customer Service Strategy. The draft strategy and its action plan will be taken to Overview and Scrutiny and then recommendations made to Members for approval in early 2022, from where the programme of transformational cultural change required to achieve our Corporate Plan ambitions will be implemented.

Financial Implications

14. The report introducing the draft Corporate Customer Service Strategy will identify any financial implications.

Legal Implications

15. None

Human Resource Implications

16. The report introducing the draft Corporate Customer Service Strategy will identify any human resource implications.

Environmental

17. The report introducing the draft Corporate Customer Service Strategy will identify any environmental implications.

Other Implications	Applies?	Other Implications	Applies?
Human Rights	No	Equalities and Diversity	No
Crime and Disorder	No	Consultation	No
Environmental	No	Access to Information	No
Sustainability	No	Exempt from publication	No
Risk Management	No		

Executive Director:	Malcolm Johnston		
Proper Officer:	Joe Powell		
Report Contact Officer:	Joe.powell@rother.gov.uk		
e-mail address:			
Appendices:	A	Customer Survey	
	B	Staff and Member Survey	
	C	Summary survey results – TO FOLLOW	
Relevant Previous Minutes:			
Background Papers:	None		
Reference Documents:	None		

Customer Survey

<p>Q1. Thinking about your most recent contact with ROTHER COUNCIL, did you deal with them... (Mark one only)</p> <p>In person Over the phone Email Text Web Chat Social Media In writing (letter)</p>										
<p>Q2. And what was the main purpose of your most recent contact with ROTHER COUNCIL ? (Mark one only)</p> <ul style="list-style-type: none"> ▪ Looking at the products or services ▪ Making a purchase ▪ Enquiry/asking a question ▪ About a problem or complaint ▪ A regular appointment/check ▪ An appointment made due to an issue or problem ▪ Checking information following receiving a letter or email ▪ ROTHER COUNCIL contacted me to follow-up on an issue I raised ▪ Other (Record comment) 										
Exceptionally dissatisfied						Exceptionally satisfied				N/A
1	2	3	4	5	6	7	8	9	10	N/A
<p>Section 1: Last Experience</p> <p>Thinking about this last experience of ROTHER COUNCIL , what score would you give for:</p> <ul style="list-style-type: none"> ▪ service range ▪ service quality ▪ service reliability ▪ Being kept informed ▪ Ease of dealing with ROTHER COUNCIL ▪ Billing/Invoicing ▪ Price/cost ▪ Speed of service/response ▪ Explaining information clearly ▪ Making it easy to contact the right person to help ▪ Ease of using the website ▪ Helpfulness of staff ▪ Competence of staff 										

Section 2: Overall

Now, thinking about how you see ROTHER COUNCIL overall, what score would you give for

- Ability to interact with ROTHER COUNCIL in the way you prefer
- ROTHER COUNCIL cares about their customers
- ROTHER COUNCIL designs the experience around its customers
- ROTHER COUNCIL keeps their promises
- ROTHER COUNCIL makes you feel reassured
- ROTHER COUNCIL are open and transparent
- ROTHER COUNCIL does the right thing in business practices (e.g. for employees/for society)
- You trust ROTHER COUNCIL

Q3. How satisfied or dissatisfied are you with ROTHER COUNCIL overall?

Exceptionally dissatisfied Exceptionally satisfied
 1 2 3 4 5 6 7 8 9 10

Q4. Thinking about your overall experience of ROTHER COUNCIL , if you had the choice, how likely would you be to:

- Stay as a customer of ROTHER COUNCIL
 - Buy another service from ROTHER COUNCIL
- Extremely unlikely Extremely likely
 1 2 3 4 5 6 7 8 9 10 N/A

Q5a. Thinking about your overall experience of ROTHER COUNCIL , if you had the choice, how likely would you be to:

- Recommend ROTHER COUNCIL to others
- Extremely unlikely Extremely likely
 0 1 2 3 4 5 6 7 8 9 10 N/A

Q5b. Please indicate how you would rate the reputation of this organisation?

Poor Reputation Excellent reputation
 1 2 3 4 5 6 7 8 9 10 N/A

Q6. How much effort did you have to make to complete your transaction, enquiry or request on this occasion?

A lot of effort Very little effort
 10 9 8 7 6 5 4 3 2 1

Q7. Give up to three words which best describe how you felt after your most recent experience with ROTHER COUNCIL ?

Q8a. Thinking about your most recent contact with ROTHER COUNCIL , was everything right first time?

- Yes
- No {ROUTE TO Q8b}
- Don't know/Not applicable

Q8b. If 'No' – Did you need to make follow up contact as a result of this?

- Yes {ROUTE TO Q8c}
- No
- Don't know/Not applicable

Q8c. If 'Yes' – How many times? (*Record number*)

<p>Q9. Have you had any kind of problem or bad experience with ROTHER COUNCIL in the last 3 months?</p> <ul style="list-style-type: none"> ▪ Yes {ROUTE TO Q10} ▪ No {ROUTE TO Q12}
<p>Q10. Did you tell anyone at ROTHER COUNCIL about your problem?</p> <ul style="list-style-type: none"> ▪ Yes {ROUTE TO Q11} ▪ No {ROUTE TO Q12}
<p>Q11. Please give a score out of 10 to indicate how satisfied or dissatisfied you feel with the items below. If your complaint is not yet resolved please click the N/A button for 'the outcome of your complaint'.</p> <ul style="list-style-type: none"> ▪ The outcome of the complaint ▪ The handling of the complaint ▪ The attitude of staff ▪ Speed of resolving your complaint <p>Exceptionally dissatisfied Exceptionally satisfied</p> <p>1 2 3 4 5 6 7 8 9 10 N/A</p>
<p>Q12. What is the one thing ROTHER COUNCIL could do to improve their service?</p>
<p>Q13. Any other comments?</p>
<p>Q14. How long have you been using ROTHER COUNCIL ?</p> <ul style="list-style-type: none"> ▪ Less than a year ▪ 1-2 years ▪ 3-5 years ▪ 6-10 years ▪ 11-20 years ▪ Over 20 years ▪ Not applicable/Don't know
<p>THANK YOU FOR COMPLETING THE SURVEY YOUR VIEWS ARE APPRECIATED</p>

Staff and Member Survey

Strategy & Culture - Commitment	
1.1 The Councillors believe that great customer service is extremely important to our business performance	By 'Directors we mean the most senior decision-making body e.g. owner/partners/council/board of directors. They should have a clear personal and collective view that quality of service is a key business imperative.
1.2 The Leader of the Council and CEO fully promote the importance of customer service	The Leader of the Council/CEO should take responsibility for customer service through establishing, maintaining and communicating a quality service ethos. It is not intended that the CEO should take operational control but he/she should visibly champion quality customer service throughout the organisation.
1.3 The Heads of Service and your line manager measure customer service performance against our goals and supports any action required for improvement	The Heads of service and your manager should monitor customer service goals and objectives and there should be regular and systematic reviews of customer service performance. Quality of service should be an agenda item on all Board and other executive meetings which should review all customer service metrics and take action where required.
1.4 Our organisation has a vision, a mission and goals that encourage and deliver great customer service	The customer service mission and vision, which should be communicated and understood throughout your organisation, and may be promoted externally, should be expressed by a clear statement which is appropriate to your organisation and customer expectation.
1.5 The CEO/Heads of Service see customer service as vital to the success of our organisation	
1.6 Our organisation puts the customer at the heart of everything we do	A central focus must be given to customer satisfaction and loyalty – it should be the basis for setting goals and objectives within your organisation.
1.7 Advertising and promotional material aligns with our core values and ethical standards	Advertising and promotional material should be honest and accurate. It should reflect the services/products offered and portray the core values and ethical standards of your organisation.
1.8 We value our reputation and do everything possible to protect it	Your organisation should have objective evidence to support the claim of valuing its reputation and brand. This could be through customer feedback from direct contact or forums or indeed the use of market research to monitor customer perception of the organisation's reputation. Use of tools such as the UKCSI may also be considered

1.9 We have consistent customer service standards covering:	
1.9.1 Quality of the products and services we deliver	Written customer service policies covering at least these statements should be clear and understood by all employees and may be made available to customers
1.9.2 Timeliness of our response to customers	Written customer service policies covering at least these statements should be clear and understood by all employees and may be made available to customers
1.9.3 Getting things right first time for customers	Written customer service policies covering at least these statements should be clear and understood by all employees and may be made available to customers
1.9.4 How we respond when things go wrong	Written customer service policies covering at least these statements should be clear and understood by all employees and may be made available to customers
1.9.5 When, how and if we offer compensation	Written customer service policies covering at least these statements should be clear and understood by all employees and may be made available to customers
1.10 We apply the same level of (customer) service to both internal and external customers	There should be a culture of 'Internal Customers'. This may involve developing internal contracts, service level agreements or memorandums of understanding between work areas
1.11 Everyone in our organisation understands how they contribute to the customer experience, even if they do not deal directly with customers	
1.12 We measure what is important to our customers by evaluating their service experience	Customer service experience may be measured in many different ways. The key requirement here is measuring what's important to your customers.
1.13 We have a process to find out what customers think of us (e.g. we ask them to complete surveys)	A customer's perception of a service may be different from their actual experience. Data can be gathered by informal or professional research methods. Your organisation should also benchmark against others and could, for example, use ICS Touchstone or subscribe to the UKCSI.
1.14 We ask our employees what they think about our organisations' customer service	Your organisation should encourage formal or informal feedback from employees to evaluate their perceptions of the service offered. For example, staff opinion surveys or ICS ServCheck could be used.
1.15 We use an independent organisation to measure our levels of service	Examples of how this can be achieved could be by internal observation or by using a third party such as a market research or mystery shopping organisation.
1.16 We measure our customers' experiences in all areas of our business	Factual evidence produced from internal or external sources could be evaluated and used as a basis to

	introduce changes to objectives or goals.
1.17 We make changes that demonstrate we have listened to feedback from customers and employees	
1.18 We treat our customers as individuals by responding flexibly to their needs	Your organisation should consider how to optimise access to its services according to the varying needs of its customer base. Employees should be empowered to deal with 'out of the ordinary' customer needs and encouraged to use their initiative.
1.19 Our organisation shares customer service performance details with key external stakeholders	
1.20 Our organisation shares customer service performance details with employees	
1.21 Our organisation understands its customers and their needs	
1.22 Our organisation makes effective use of customer insight in order to improve customer service	
1.23 Our organisation's customer service strategy helps it achieve its business goals	
1.24 My personal objectives include objectives related to customer service	
1.25 Our organisation rewards people based on customer satisfaction performance	

People - Capability	
2.1 We recruit people who demonstrate excellent customer service skills and behaviours	Required staff competencies should be identified and customer service should have a high priority. Advertising, recruitment, job specification and training should encompass customer focused qualities. Interviewing strategies should focus on service competencies using tests such as ICS FirstStep
2.2 Our people reflect the organisation's desired image and reputation	Clearly, this is very subjective and might range from a firm of solicitors that expects its staff to portray a sober, conservative image to an avant-garde advertising agency whose staff might be expected to be funky and hip. You decide what is appropriate.
2.3 Our induction process includes sufficient focus on the importance of customer service and our service objectives	Your organisation should have a formal induction programme where initial training and awareness focuses on the importance of the customer relationship.
2.4 Our people are fully informed about:	
2.4.1 The products we offer	All employees should be fully informed on these items and be able to demonstrate their knowledge to a level

	relative to their role, e.g. sales people would need a higher level than data processors.
2.4.2 The services we offer	
2.4.3 Features and benefits of our products/services	
2.4.4 Prices/costs	
2.4.5 How to act when things go wrong	
2.4.6 Our customers' needs	
2.4.7 How different parts of our organisation work together to achieve excellent service	
2.4.8 Our process for dealing with customer complaints	
2.5 Our people are encouraged to improve their customer skills through training, coaching, qualifications or professional development.	Employees should be encouraged to develop a personal development plan perhaps including access to the ICS Professional Awards. Resources should be in place to deliver suitable training and coaching and ICS ServiceFocus could be considered.
2.6 Our organisation is committed to the continuing professional development of our people	Your organisation could be IIP accredited and should commit to continual development of employees – perhaps by encouraging use of the ICS Professional Awards leading to the Continuous Professional Development programme.
2.7 Our people are encouraged to obtain professional qualifications in customer service related disciplines.	Employees should be encouraged to achieve a customer service related qualification, e.g. an NVQ/SVQ, Irish Traineeship, Advanced Apprenticeship or an ICS Professional Award.
2.8 Our people are flexible, proactive, use their initiative and have a positive attitude to internal/external customers	Your organisation should encourage staff to be flexible and proactive towards customers. Training, the initial recruitment process and performance management encourage these behaviours and skills.
2.9 Our people are assessed on their customer service skills and behaviours	Criteria for assessing employees on their customer service skills should be established within the normal performance review cycles. Skills assessment should form part of the supervisory roles within the organisation.
2.10 Our people are empathetic listeners and show concern for others	Training and initial induction could include understanding customer needs training for employees when and where appropriate. Examples of these skills could be collected from employee and customer feedback which may be reviewed during staff appraisals.
2.11 Our managers understand how to use technology to improve our customer service	All managers should be able to identify the best technology available to them and understand how it could be used in a practical, service-related application.
2.12 Our organisation delivers a consistent	This means whether we communicate face to face,

service through all the communications channels customers use to interact with us	email, letter, telephone, customer service is as important and delivered to the same high standards
---	---

People - Continuity	
2.13 Every manager and team-leader values their people, demonstrated through their behaviour	There are a whole range of strategies that every manager/ team-leader should be able to demonstrate how they value their people. Team meeting minutes, one-to-one meetings, staff appraisals and 360 feedback could show how this is being achieved.
2.14 A team approach, characterised by respect for and commitment to colleagues, is encouraged	Organisations may have internal and external team building training or team events. There may be team awards or a collective approach to deliver outstanding customer service.
2.15 There is an effective balance between the needs of the individual, their colleagues, and the organisation	Feedback from staff appraisals could identify the need for work/life balance research.
2.16 Our organisation supports people appropriately when things go wrong	Your organisation should encourage a 'no blame' culture. Proper root-cause analysis should be in place to establish why something went wrong rather than who caused it.
2.17 Our organisation values the diversity of its people	Your organisation should encourage diversity in the context of people being themselves and the way they act. Staff should be encouraged to weigh their actions against their conscience.
2.18 The service performance of our people is a key element of our performance management system	Service performance measurements should involve all employees. Performance management systems for all staff should include metrics based on customer service. Where there are departmental (not individual) targets these should be reinforced by a 'team' philosophy.
2.19 People who deliver superior customer experiences are rewarded and recognised	Recognition and reward schemes should be in place for superior service achievements. Achievements could relate to career progression within the organisation.
2.20 Achievement in customer service delivery and innovation positively influences career development	Outstanding individual achievements are a consideration for career progression. Promotion prospects for service achievement and innovation should be encouraged through the staff appraisal process

Processes - Consistency	
3.1 We design our processes and systems with the customer in mind	the customer perspective should be an important consideration. It may be achieved through focus groups or independent research and a thorough investigation of the customer's needs must be taken into account prior to the process being introduced
3.2 Our processes ensure we deliver a	Processes should be developed with quality and

quality product and/or service	fitness for purpose as a desired and defined outcome. A 'sign off' at each stage may be considered ensuring that the process meets the outlined requirements
3.3 Internal and external communications display a consistent commitment to customer service	Internal and external communication should emphasise your organisation's commitment to customer service. You could include sales literature, letter headings and website
3.4 Customers are kept informed about progress when dealing with us	Processes should be in place so that the customer is aware of what is happening either in the normal sales/service process or within the complaint handling process.
3.5 We ensure we have a sufficient number of people or the technology in place to meet the service demands of our customers	Your organisation should ensure that adequate staff levels, correct equipment to service the demand and relevant information to enable the customer to deal with the organisation are all in place. The organisation's business plan should identify these resources and allocate budgets accordingly.
3.6 We have arrangements for customers who need special assistance because of disabilities or language/cultural differences	Typical examples could include (but not be limited to) large print documents, having deaf loop aids installed and disabled access arrangements. Staff training could include cultural awareness and diversity training.
3.7 Documents for customers are written in plain English or other languages that reflect our customer base	Note may be taken of the Plain English campaign. All documents for customer consumption should be clear and unambiguous
3.8 Our physical resources (buildings, furniture, equipment, manuals, etc.) are designed for and meet our customers', suppliers' or partners' expectations (where applicable)	All physical resources should be laid out or designed to meet customer expectations. Customers with disabilities should be considered and appropriate provisions made
3.9 Our technology supports our customer-centric culture and service aspirations	All technology-based systems should support customer service and not be a limiting factor. User-testing should focus on customer requirements
3.10 Our technology helps us minimise errors when dealing with customers	Technology used should be 'tried and tested' to minimise errors and data should need to be input only once to reduce processing error.
3.11 We use accreditations and/or industry best practice guidelines to help us deliver an excellent customer experience	This could involve using established 'best practice' principles, guidelines or principles from the organisation's trade association or by other recognised third party principles such as the EFQM, ISO 9001:2000, Customer Service Excellence or ICS ServiceMark.
3.12 We benchmark our customer service against organisations in our sector	This could be achieved through benchmarking information available from trade associations or through the ICS business benchmarking survey
3.13 We benchmark our customer service against organisations outside our sector	
3.14 Our organisation is good at managing change in order to respond to changing	A business function is set up to manage business change e.g. projects, with clear methodologies in place

customer needs	to ensure customer impact and service is considered with at least the same priority as other business interests.
----------------	--

Processes - Creativity

3.15 Our Senior Leadership Team encourages us to be creative in order to deliver the best customer experience	Reward systems, financial and otherwise, could be used to encourage and stimulate creativity in employees. Senior management should encourage staff participation in the customer process and encourage feedback
3.16 We have a suggestion scheme (or other system) for employees to put forward ideas to improve customer experience	Innovation is the lifeblood of any organisation. There should be systems in place to develop ideas for service improvements – these could include suggestion boxes or staff focus groups. In addition, all internal and external feedback should be considered.
3.17 Our organisation innovates to improve customer service	'Innovation' could cover a range of ideas/implementations from a better way of doing something that improves an outcome for a small number of customers to a large service implementation requiring cross-functional commitment.
3.18 Suggestions for service improvement are taken seriously	All suggestions for change should be considered positively and implemented where appropriate.
3.19 There are clear reasons for the introduction of new or changed services	A new or changed system should be developed in a logical way. It may be prudent to run a risk analysis or a pilot prior to being used by customers.
3.20 We understand the impact on customers and employees before introducing changes to our products or services	Customers and staff should be considered before any change is introduced. This could be through focus groups or surveys.
3.21 Customers are involved in the development of new products and services	
3.22 Employees are recognised for and kept fully informed of progress on their suggestions for service improvement	Suggestions should be assessed quickly and a process in place to keep originators informed. This could be through the internal communications process or a dedicated intranet facility.
3.23 We regularly learn better methods or approaches to service from other organisations inside and outside of our industry sector	Organisations may consider benchmarking themselves against other organisations in their sector or other sectors. There should be a systematic search for best practice and use of local Chambers of Commerce, visits to competitors or the use of an external independent organisation to carry out benchmarking.

Rother District Council

Report to:	Cabinet
Date:	4 October 2021
Title:	Afghan Resettlement Update
Report of:	Joe Powell
Cabinet Member:	Councillor Terry Byrne
Ward(s):	All
Purpose of Report:	To update Members on the details of both the Afghan Relocations and Assistance Policy (ARAP) and the Afghan Citizens Resettlement Scheme (ACRS).
Decision Type:	Non-Key
Officer	
Recommendation(s):	It be RESOLVED : That
	<ol style="list-style-type: none">1) the Government funded integration package for both the Afghan Relocations and Assistance Policy (ARAP) and the Afghan Citizens Resettlement Scheme (ACRS) be noted;2) the progress of the Council in successfully meeting its commitment to resettle two families under the ARAP be commended; and3) the intention of the Council to join the county-wide commitment to resettling 200 families under the ACRS be noted.
Reasons for Recommendations:	To update Members of the ARAP and the ACRS that are wholly funded from external grant from the Home Office.

Introduction

1. The Afghan Relocations and Assistance Policy (ARAP) was announced in spring 2021. The project aims to resettle Afghan locally employed staff who have worked alongside British forces in Afghanistan in the UK, following NATO's decision to withdraw military forces from the region. Nationally, the programme aims to resettle 3,000 people (approximately 600 families) before September. Local authorities are being encouraged to participate in the scheme, by offering to resettle families in their areas *through private rented accommodation*
2. The local authorities in East Sussex have committed to the following target for the programme:

Local Authority	Number of families
Eastbourne	2
Hastings	2
Rother	2
Lewes	1
Wealden	1
Total:	8

3. Due to the ongoing unrest in Afghanistan, the Government has announced a separate Afghan Citizens Resettlement Scheme (ACRS) to support vulnerable people displaced by the conflict. The national scheme has seen the UK Government make a commitment to resettling 5,000 households in year one and a further 15,000 in the years beyond. The local housing authorities and wider partners in East Sussex are minded to commit to resettling 200 individuals.
4. The people and families that will be resettled under the ACRS will be vulnerable people, including women and girls at risk, and members of minority groups at risk (including ethnic and religious minorities and LGBT+). Some of those who arrived in the UK under the evacuation programme, which included individuals who were considered to be at particular risk – including women’s rights activists, prosecutors and journalists – will be the first to be resettled under the ACRS.
5. Members will be aware that the Council (alongside its partner agencies and community and voluntary sector groups) has experience of resettling those displaced by conflict in Syria under what has now evolved into the UK Resettlement Scheme (UKRS). The Council has successfully resettled 8 families under the scheme over a five-year period and it is well placed to meet its share of the national commitment made by the UK Government under the ACRS.
6. The funding awarded under the existing UKRS has comfortably met the costs of operating the scheme to local housing authorities. The funding announced for the ACRS and ARAP are comparable to the existing UKRS and officers are therefore confident that the costs of operating the new Afghan schemes will also be met by integration package of funding from Government.

Integration package for Afghan citizens

7. Those arriving through the ARAP and ACRS will be granted immediate Indefinite Leave to Remain allowing them to benefit from full rights and entitlements and providing them with the certainty and stability they need to build their life here.
8. In addition, the funding integration packages for both the ARAP and the ACRS have now been aligned, to provide a core local authority tariff of £20,520 per person over 3 years. The amount is equivalent to the per person tariff under the Syrian resettlement schemes. There is also funding available in addition to the core tariff:

ACRS	Year 1	Year 2	Year 3	Total
LA Tariff (per person)	£10,500	£6,000	£4,020	£20,520
Education (per child)	Up to £4,500			Up to £4,500
English language (per adult)	£850			£850
Health (per person)	£2,600			£2,600

9. In addition, a further £20m fund of flexible funding in the current financial year (2021/22) has been made available to support local authorities with higher cost bases with any additional costs in the provision of services.
10. Further funds of £10million is being made available to meet housing costs in year 1 of the scheme to support the resettlement of the initial 5,000 person target. The fund will fall to £5million in year 2 and £2million in year 3.

Afghan Citizens Resettlement Scheme (ACRS)

11. East Sussex local housing authorities have discussed an indicative target to resettle 200 individuals across East Sussex through the ACRS programme. The rationale being that this represented 1% of the 20,000 Government commitment and the population of East Sussex represents 1% of the total population of the UK. This is the same criteria which was used when resettling Syrian refugees and enables East Sussex to demonstrate to Government and the local community that it is ready to play its part in the overall programme proportionate to its population size and available resources.
12. An operational steering group has been established by the local housing authorities in East Sussex to oversee preparations for the new programme, bringing together partners from across housing, health, education, social care, and the community sector. The aim of the task and finish group is to build on existing good practice through the UKRS and identify potential capacity gaps within partner services.
13. Given the significant and increasing pressure on housing and homelessness services across the county, exacerbated by the current COVID-19 pandemic, it is proposed that accommodation for the scheme should be sourced where possible from the private rented sector and not the social housing sector. This is considered important in respect of community cohesion and the longer-term support for the scheme and its success locally.

Conclusion

14. The Council has shown a strong commitment to previous UK Government funded resettlement schemes and has offered a place of sanctuary and safety for those displaced by the conflict in Syria. The Council is proud to have met its share of the national commitment under the Syrian resettlement initiatives and the Council

is well placed to meet the commitment already made under the ARAP. The Council is equally in a position to meet its share of a county-wide commitment to resettling 200 households across East Sussex.

15. Both the ARAP and ACRS will draw on the arrangements put in place for the previous scheme to resettle Syrian refugees and are transferable to the Afghan schemes. Support for the new schemes can be delivered by the existing team, utilising the existing partnership arrangements and this is proposed.

Financial Implications

16. Both schemes are cost neutral to the Council. Costs will be demand led and claimed back from central government under the terms of a formal grant agreement.

Legal Implications

17. None

Human Resource Implications

18. We are advertising a new role within the existing UKRS team at Rother to support the delivery of the afghan resettlement schemes.

Environmental

19. The accommodation purchased will be offered to tenants with the following standard: EPC E or above., the minimum required to rent a property. Landlords will be encouraged to maximise their EPC rating. The housing will comply with Health and safety standards for rented homes (HHSRS) and Decent Homes Standard.
20. The Council must in the exercise of its functions, have due regard to the need to;
- (a) eliminate discrimination, harassment and victimisation;
 - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
 - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it, pursuant to s149 Equality Act 2010.

This is known as the Public Sector Equality Duty.

Other Implications	Applies?	Other Implications	Applies?
Human Rights	No	Equalities and Diversity	Yes
Crime and Disorder	No	Consultation	No
Environmental	Yes	Access to Information	No
Sustainability	No	Exempt from publication	No
Risk Management	No		

Executive Director: Malcolm Johnston

Proper Officer:	Joe Powell
Report Contact Officer:	Joe.powell@rother.gov.uk
e-mail address:	
Appendices:	None
Relevant Previous Minutes:	
Background Papers:	None
Reference Documents:	None

This page is intentionally left blank