

Housing provision in Rother District



Background Paper

August 2011

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Issues &
Options

Strategy
Directions

Pre - Submission

Adoption

Examination



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Housing Provision in Rother District

LDF Core Strategy Background Paper

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1 Introduction

Purpose

- 1.1 This Background Paper sets out the evidence that underpins the overall housing provisions in the Proposed Submission Core Strategy.
- 1.2 It fully acknowledges the housing provisions for the district that form part of 'The South East Plan'¹.
- 1.3 While the South East Plan's housing targets are used as the starting point for the Core Strategy, there have been significant changes of circumstances since the South East Plan was prepared that warrant a review of those targets.
- 1.4 There has been a major change in economic circumstances nationally, with implications for the economic outlook and the property market.
- 1.5 At the local level, previous assumptions about the timing of planned infrastructure, most notably the Bexhill to Hastings Link Road, have proved optimistic, with knock-on effects for development at Bexhill. Also, further work on the development potential of settlements can now inform consideration of sustainable levels of housing growth.
- 1.6 Against this backdrop, meeting the South East Plan's housing provisions may mean that the Core Strategy does not conform with other policies to regenerate the coastal belt, to accord with ecological imperatives, and to conserve the High Weald Area of Outstanding Natural Beauty.
- 1.7 Therefore, this assessment aims to provide a robust basis for the overall housing numbers in the Core Strategy, taking due account of both strategic and local considerations.
- 1.8 Also, by drawing on the most recent information, this assessment accords with advice to local planning authorities by Government² to collect and use reliable information to justify their housing supply policies in local development plans. In particular, it demonstrates how the Council's approach accords with national policy in PPS3: Housing.

¹ South East Plan published by Government on 6th May 2009 and available to view at <http://webarchive.nationalarchives.gov.uk/20100528142817/http://www.gos.gov.uk/gose/planning/regionalPlanning/815640/>

² Letter from the CLG Chief Planner dated 6th July 2010

Scope

- 1.9 This Background Paper reviews the national policy guidance, as well as the basis of, and assumptions behind, the housing provisions for Rother in the South East Plan. It considers their currency in terms of providing a strategic direction for the wider area as well as for Rother.
- 1.10 The main body of the Paper concerns itself with determining the appropriate level of housing growth by looking in turn at the various factors that need to be carefully balanced. These factors, and the interplay between them, are set out in Section 3: Methodology.
- 1.11 In drawing conclusions, the Paper focuses on strategic housing issues that affect the whole or large parts of the district, such as pressures from in-migration, the high cost of housing relative to local earnings, the need to improve local job opportunities and the need to conserve the ecological value of the international and national nature conservation sites and the High Weald Area of Outstanding Natural Beauty.
- 1.12 At the same time, in considering both the overall scale and the broad distribution of future development, full account is taken of work that has examined the potential for sustainable development at the local parish or settlement level.
- 1.13 Cross reference to related Background Papers is made within the Paper, where appropriate. Copies of all Background Papers can be found on the Council's website under [Planning – LDF – Background Evidence Studies](#).

2. Context

National Planning Policies

- 2.1 The main statement of national policy on housing provision is **Planning Policy Statement 3 (PPS3): Housing**, published in June 2010. This sets the Government's key housing policy goal as being:

'to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live.'

- 2.2 In support of this, it is seeking:

- To achieve a wide choice of high quality homes, both affordable and market housing, to address the requirements of the community.
- To widen opportunities for home ownership and ensure high quality housing for those who cannot afford market housing, in particular those who are vulnerable or in need.
- To improve affordability across the housing market, including by increasing the supply
- To create sustainable, inclusive, mixed communities in all areas, both urban and rural.

- 2.3 It adds that the specific outcomes that the planning system should deliver are:

- High quality housing that is well-designed and built to a high standard.
- A mix of housing, both market and affordable, particularly in terms of tenure and price, to support a wide variety of households in all areas, both urban and rural.
- A sufficient quantity of housing taking into account need and demand and seeking to improve choice.
- Housing developments in suitable locations, which offer a good range of community facilities and with good access to jobs, key services and infrastructure.
- A flexible, responsive supply of land – managed in a way that makes efficient and effective use of land, including re-use of previously-developed land, where appropriate.

- 2.4 Paragraphs 32 – 35 relate to assessing an appropriate level of housing. These confirm the need for a strategic, evidence-based approach, which takes account of current and future levels of need and demand for housing and affordability levels, evidence of the availability of suitable land for housing,

Government's overall ambitions to improve affordability and increase housing supply, a Sustainability Appraisal, and an assessment of the impact of development upon existing or planned infrastructure and of any new infrastructure required.

2.5 Local Planning Authorities are expected to plan for housing over a period of at least 15 years from the date of adoption. In addition, they should identify sufficient specific deliverable sites to deliver housing in the first five years.

2.6 Paragraph 59 relates to windfall sites, being those that arise but which have not been specifically identified as available in the local plan process. While these have made a substantial contribution to house-building levels in Rother, the PPS states:

'Allowances for windfalls should not be included in the first 10 years of land supply unless Local Planning Authorities can provide robust evidence of genuine local circumstances that prevent specific sites being identified. In these circumstances, an allowance should be included but should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends.'

2.7 It is noted that the definition of 'previously developed land' was amended by a Ministerial announcement in June 2010, with the effect of removing private residential gardens from the definition. At the same time, the indicative minimum density of 30 dwellings per hectare was removed.

2.8 **PPS4: Planning for Sustainable Economic Growth**, published in December 2009, sets out the Government's policies in relation to Planning for Economic Development in both urban and rural areas.

2.9 It confirms in Policy EC6.1 that local planning authorities should continue to 'ensure that the countryside is protected for the sake of its intrinsic character and beauty, the diversity of its landscapes, heritage and wildlife, the wealth of its natural resources and to ensure it may be enjoyed by all.'

2.10 Policy EC6.2 states that:

'In rural areas local planning authorities should:

- a) strictly control economic development in open countryside away from existing settlements, or outside areas allocated for development in development plans;
- b) identify local service centres (which might be a country town, a single large village or a group of villages) and locate most new development in or on the edge of existing settlements where employment, housing (including affordable housing), services and other facilities can be provided close together;

- c) support the conversion and re-use of appropriately located and suitably constructed existing buildings in the countryside (particularly those adjacent or closely related to towns or villages) for economic development;
- d) set out the permissible scale of replacement buildings and circumstances where d. replacement of buildings would not be acceptable;
- e) seek to remedy any identified deficiencies in local shopping and other facilities to serve people's day-to-day needs and help address social exclusion;
- f) set out the criteria to be applied to planning applications for farm diversification, and support diversification for business purposes that are consistent in their scale and environmental impact with their rural location;
- g) where appropriate, support equine enterprises, providing for a range of suitably located recreational and leisure facilities and the needs of training and breeding businesses that maintain environmental quality and countryside character.

2.11 **PPS7: Sustainable Development in Rural Areas**, published in August 2004, remains operative in relation to its housing policies.

2.12 Over and above the guidance in PPS3, it states (paragraph 8) that: *'To promote more sustainable patterns of development and make better use of previously developed land, the focus for most additional housing in rural areas should be in existing towns and identified service centres'*, but adding *'it will also be necessary to provide for some new housing to meet identified local need in other villages.'*

2.13 Of relevance to the High Weald AONB, it states (paragraph 15) that planning authorities *'should continue to ensure that the quality and character of the wider countryside is protected and, where possible, enhanced.'* Also, they *'should have particular regard to any areas that have been statutorily designated for their landscape, wildlife or historic qualities where greater priority should be given to restraint of potentially damaging development.'*

Regional Planning Policies – The South East Plan

2.14 While the South East Plan was only approved in May 2009, the process in setting housing targets was protracted, dating back to 2004. It is worth reviewing this in order to better understand underlying arguments behind its housing provisions for the district.

2.15 From the outset³, there was a clear concern by the Local Planning Authorities about the relationship between the under-performance of the economy and the scale of development that could be accommodated sustainably in the Sussex coast. It was then that the South East England Regional Assembly

³ Sussex Coast Sub-Regional Study April 2004

(SEERA) identified a need for sub-regional policies for the Sussex Coastal Towns⁴.

- 2.16 Across Sussex, there was a broad consensus that there was very limited scope for further development in sustainable locations close to the coastal towns available to maintain previous rates of growth set out in PPG9, let alone a 30% increase on that, because of tight, extensive environmental designations and constraints such as flood risk.
- 2.17 Also, because of the tightness of environmental constraints, the towns have been intensifying within their boundaries for many years and densities are already high. Even higher densities would be necessary to continue a strategy of urban intensification and there were concerns about the quality of life and congestion that would result.
- 2.18 Across the county's coastal belt, it was concluded that greater priority should be given to economic development over housing development to achieve a better future balance between jobs and labour supply. This is because there is significant widespread net out commuting; very low locally-generated demand for housing; and most housing demand arises from people wanting to move into the sub-region to live.
- 2.19 For housing, priority was seen as needing to be given to addressing the issue of affordability, as house prices (heavily influenced by external migrant demand) were high compared to local earnings.
- 2.20 This led to the local planning authorities in Sussex (including Brighton & Hove, and led by East Sussex County Council) submitting the 'Sussex Coast Sub-Regional Strategy' to SEERA in October 2004.
- 2.21 This Strategy tested and evaluated options for the level and broad distribution of economic and housing growth to be planned for in the period to 2026.
- 2.22 It concluded that:
- The best strategic balance overall would be achieved by continuing housing development at a level approaching the RPG9 rate alongside a more vigorous drive for economic development and regeneration.
 - The aim should be to provide about 76,000 dwellings in the sub-region from 2001 to 2026 (See Table 1 below), subject to more detailed testing of deliverability including infrastructure availability.
 - Development should be focused on the existing towns.
 - New allocations were suggested as follows, subject to the caveat that more detailed testing was necessary, before we could be confident about delivery:
 - Western (Chichester to Angmering) - 4,000 dwellings after 2016

⁴ SEERA Brief for the preparation of a strategy for the Sussex Coast Sub-Region August 2004

- Central (Worthing to Seaford) - 1,000 dwellings at Brighton & Hove after 2011
- Eastern (Eastbourne to Rye) - 6,000 dwellings at Bexhill and in the Eastbourne/Hailsham area after 2011
- Even this would require a continuation of the same level of urban intensification within the towns, as well as new housing land allocations. There were question marks over whether this could be achieved without some incursion into environmental constraints, or that it was deliverable given outstanding uncertainties regarding infrastructure.

2.23 The range of housing provisions agreed by SEERA in the *Consultation Draft South East Plan*, and the basis of them, is set out below:

	Dwellings/year
Average regional build rate 1999-2004	25,500
Regional Planning Guidance for the South East	28,000
SEERA's 10 year migration trend population projection	32,000

2.24 This was elaborated upon in disaggregated distributions of regional development options, by sub-regional and rest of county areas, in a background note⁵.

2.25 Views were sought on two spatial distributions of the three different levels of housing development. The extracts for the Sussex Coast and Rest of East Sussex areas are set out below.

Area	Spatial Option 1 Existing Policy			Spatial Option 2 Sharper Focus		
	25,500	28,000	32,000	25,500	28,000	32,000
Regional Total						
Sussex Coast sub-region	2,700	3,000	3,600	2,300	2,600	3,100
Rest of East Sussex	300	400	500	400	400	500

2.26 Public consultation took place between January and April 2005.

⁵ Technical Note 2 Spatial Options, SEERA, January 2005

2.27 The Council made the following comments on the **Draft South East Plan** in relation to housing⁶:

- 'In relation to Rother District, additional housing per se is not the main requirement. Whilst there is a need to address affordable housing, the prime requirement for the area is regeneration coupled with employment generating uses. Any housing growth should be subservient to those prime requirements and should be of a level that is commensurate with maintaining the quality environment of the district.'
- 'Furthermore, no significant development of employment uses or housing can be contemplated or implemented without the appropriate level of investment into the road (A21, A259, A27 trunk roads) and rail infrastructure (Ashford, Hastings, Brighton line, Hastings/Charing Cross line).'
- 'In addition, investment is required into the local road network (Bexhill Hastings Link Road) with appropriate additional extensions to the local road network to support employment and housing growth.'
- 'Similar investment will be required into the Social Infrastructure Affordable Housing, schools, medical facilities etc. Also growth will require additional capacity with regard to water supplies for the area'; and
- 'Finally in conclusion Rother District Council will only support the Plan if the Plan can deliver infrastructure, regeneration and employment benefits to the area. Significant housing growth without the infrastructure, regeneration and employment investment would be opposed by the Council.'

(housing comments are highlighted by underlining.)

2.28 During this period, work also progressed in the sub-regions on district level distributions of housing provisions, which were articulated in the '**New Homes for East Sussex**' consultation document.

2.29 The District Council resolved to make the following response to East Sussex County Council on 'New Homes for East Sussex 2006 2026'⁷:

- "1) The overall level of housing development proposed for the Rother part of the Sussex Coast area is considered appropriate having regard to economic, social and environmental objectives, subject to the following qualifications:
- a) The Bexhill-Hastings Link Road needs to be committed within relevant national, regional and local transport strategies and

⁶ Minute CB188 RDC Cabinet 11th April 2005

⁷ Minute CB88/10/05 of cabinet on 31 October 2005.

funding programmes, and specifically the proposed Implementation Plan, to be built within the next 5 years;

- b) This level of housing needs to be shown to be consistent with the sustainable regeneration and growth of the Hastings/Bexhill area (as highlighted in the Council's earlier representations - see paragraph 5.1 of the Report) and specifically with anticipated growth in potential employment, the importance of which should be recognised through a regeneration priority area status;
 - c) It is essential that proper provision is made for the infrastructure needed to support and integrate development, especially in relation to education, health care, water supply and affordable housing as well as transport, in both policy and the investment programmes of the relevant public agencies.
- 2) The proposed level of housing in rural inland parts of Rother District is generally accepted, but it should be clear that the local provision of new homes properly needs to be determined as part of a more comprehensive sustainable rural area strategy though the preparation of the LDF and be supported by the necessary infrastructure as highlighted in 1(c) above;
 - 3) The identification of Hastings as a Regional Transport Hub is strongly advocated for inclusion in the South East Plan to complement and support the regeneration and development strategy for the area; and
 - 4) While rigid targets for the coastal and inland parts of the District would remove flexibility, it is essential to have policy safeguards that ensure against having to achieve higher housing levels in rural areas than are *sustainable simply to meet unmet housing requirements for Bexhill that may be frustrated by infrastructure deficiencies or delays.*"

(Housing comments are highlighted by underlining.)

2.30 SEERA ultimately agreed an overall regional housing target of 28,900 dwellings per annum in July 2005. This formed the basis of the **'South East Plan - Consultation on Submitted Documents'**, which incorporated the housing numbers in 'New Homes for East Sussex' into its housing distribution.

2.31 In response to the 'South East Plan - Consultation on Submitted Documents', the Council resolved⁸:

'That the Director of Services be authorised to submit representations on the submitted South East Plan in accordance with the following:

- *Support is given to policies that recognise and seek to reduce the relative economic disadvantage of the Sussex Coast sub-region*

⁸ Minute CB15 Cabinet 5th June 2006

and of the Hastings/Bexhill area specifically in this context, the designation of Hastings as a regional hub is also supported;

- *The level of housing growth identified for Rother District overall is regarded as consistent with the primary requirement for regeneration and commensurate with maintaining environmental quality, and is therefore accepted but only on the basis that the infrastructure required to support it is forthcoming;*
- *The approach to ensuring adequate infrastructure capacity to achieve the strategy, both in policy and through the 'Implementation Plan', is supported, as are the key transport improvements identified, although the need to 'firm up' on the delivery of these should also be highlighted;*
- *The possible need for enlargements to Bewl and Darwell reservoirs is noted and any proposals should be subject to full sustainability appraisals; and*
- *The heavy burden of expectation the South East Plan places on local development frameworks be noted, and opportunities within the South East Plan both to provide a more clear regional policy 'steer' in relation to energy and water efficiency, and to avoid undue prescription, such as the requirement to define urban fringe boundaries, be sought.'*

2.32 In response to the subsequent **Proposed Changes to the South East Plan**, the Council resolved⁹ to make the following representations:

- *"Support the housing targets for Rother district, but object to emphasis being minima (in Policy H1), as this is not justified by supporting evidence work or the Sustainability Appraisal;*
- *Seek acknowledgment within the Plan of the reliance on additional transport capacity to achieve major development in Bexhill;*
- *Object to the lack of reference to the retention of important open gaps between settlements to protect their identity and character; and*
- *Object to amendment to Policy SCT3 and propose a revision to better safeguard all employment sites."*

2.33 It is clear from the above that the Council has consistently been cautious about the appropriateness as well as the capacity of the district to absorb new housing, which is essentially driven by in-migration, but has supported development, and the current South East Plan housing provision for the district, subject to increased transport capacity at Bexhill.

⁹ Cabinet Minute CB08/72, 6th October 2008

Development of the Core Strategy

Issues and Options

2.34 The issues and options consultation presented a number of key questions regarding key issues for Rother. The responses to the consultation were used to influence the subsequent version of the Core Strategy, the Core Strategy: Consultation on Strategy Directions.

2.35 There were two key questions asked during the consultation which are relevant to housing, relating to:

- a) The respective merits of higher or lower levels of growth, and;
- b) The split of housing along the coastal belt (mainly Bexhill and the fringes of Hastings, but also Rye) and the rest of the District.

2.36 With regards to question a) above, the main point and common themes were:

'We received a fairly low number of responses under this question but nevertheless they were from a broad sector of respondents. These were from local authorities and government organisations, development interests, environmental groups and community bodies, businesses and individuals.'

The main issues raised under this section include:

- *Strategy to flexible to take higher levels of growth.*
- *High growth scenario should be anticipated, however there is recognition that Rother is restricted mainly through the size of AONB*
- *New development can be seen as a way to regenerate, although economy growth potential limited*
- *Housing growth, job growth and infrastructure sold correlate¹⁰*

2.37 In terms of how the responses were addressed in the Core Strategy: Consultation on Strategy Directions, it was stated that:

'Objective of the overall spatial development strategy is to meet the development requirements and otherwise accord with the development strategy of the South East Plan. It is noted that the Panel endorsed the housing growth for Rother. Having assessed the potential for more development, it is considered that there would be considerable environmental impacts if higher a level of development were pursued.'

¹⁰ Proposed Submission Consultation Statement, June 2011

It is recognised that development will need to be considered against need to protect and enhance the distinctive landscape character of the AONB. No large growth of AONB settlements is proposed.

The part that development has to play in regeneration is recognised with a strong emphasis on facilitating economic development, as set out in the Economy section, and on ensuring sufficient infrastructure is available for development to proceed (see Overall Spatial Strategy)’.¹¹

2.38 With regards to question b) above, the main point and common themes were:

‘...there were a low number of responses. However, most agreed with what was said and answered yes thinking that the rural coastal split was correct way of dividing the area’¹².

2.39 In terms of how the responses were addressed in the Core Strategy: Consultation on Strategy Directions, it was stated that:

‘The Overall Development Strategy for the distribution of development aims to meet the development requirements of the South East Plan including maintaining an approximate balance of development between the ‘Sussex Coast’ and rest of the district.

The South East Plan recognises that there is some flexibility in the split of development, and the Strategy envisages a somewhat higher proportion in the ‘Sussex coast’ part of the District in order to help support regeneration as well as recognising the constraints on development in the AONB.

The Sussex Coast is not regarded as a single unit: Bexhill and Rye are treated individually’.¹³

Core Strategy: Consultation on Strategy Directions (November 2008)

2.40 An overall increase in net housing numbers over the Plan period 2006-2026 of 5,600-5,850 was proposed. This was essentially derived from the South-East Plan.

2.41 The Core Strategy demonstrated the how this District wide-target would be achieved, by apportioning it between smaller geographical components within Rother District. The preferred distribution was:

- 3,100 – 3,300 dwellings at Bexhill
- 450-500 dwellings at Battle

¹¹ Proposed Submission Consultation Statement, June 2011

¹² Proposed Submission Consultation Statement, June 2011

¹³ Proposed Submission Consultation Statement, June 2011

- 450 dwellings at Rye
- 200 -400 dwellings on the hasting fringes
- 1,300 dwellings in identified villages

2.42 There is a recognition that, in the event of the Bexhill Hastings Link Road not being built or being significantly delayed, and this resulting in an anticipated shortfall against housing targets of more than 15% over the forthcoming 5 years, then action will be taken to bring forward allocations phased later in the Plan period in order to maintain a 5-year supply of readily available housing land.

2.43 At the same time, it identified that the overall housing strategy (in effect, the housing target and distribution) would need to be reviewed if the Link Road opening is likely to be after April 2016 and housing or business development levels for Bexhill are much lower than projected.

2.44 A summary of the representations made during the Core Strategy: Consultation on Strategy Directions (November 2008) are shown below and is taken from the Consultation Statement – June 2011.

Overall Spatial Strategy

Main issues	Key themes	Response and relevant amendments to the Core Strategy
Scale of growth	Appropriateness of South East Plan targets – both more and less development sought	It is noted that the expectation on LPAs to provide for “at least” the South East Plan housing target was removed prior to adoption. There have been material changes in circumstances which warrant a review of the SE Plan targets, and this is presented on a settlement basis, which is regarded as more appropriate, especially in the context of the government’s ‘localism’ philosophy. The scale of development proposed combines regard to market demand with local visions and constraints. It concludes that a somewhat lesser scale of growth is appropriate.
Distribution of development	General support for a service centre-led distribution, but other factors	The ‘service centre’ led approach is maintained, but influenced by local factors.
	Relative scale of growth at Battle and Rye - both more and less development sought	Further work has been undertaken in relation to the capacity of the towns and the relationship between development and local objectives. It is accepted that the scale of development proposed somewhat, especially in Rye, should be reduced somewhat to reflect local constraints.
	Development in villages – is there more or less potential, having particular regard to supporting viable communities and AONB impacts	The scale of development previously proposed is considered appropriate and deliverable, whilst it is accepted that the scale of development in any settlement should not be disproportionate and that it should support the existing development pattern. Particular attention is given to helping meet local housing and other community needs in the Rural Areas chapter.
	Are the developments proposed on the Hastings fringes appropriate - both	The larger urban extensions have been reviewed in the light of more recent circumstances and it is concluded that those on the western side of the town would not constitute sustainable expansions. This is elaborated upon in response to representations on the Hastings Fringes section.

Main issues	Key themes	Response and relevant amendments to the Core Strategy
	more and less development sought?	
	Development boundaries – general support but need to review	The principle of development boundaries around settlements is retained, with criteria to guide boundary reviews as part of site allocations work set out.
Relationship with the Link Road	Risk of delay or cancellation requires contingencies which should, or should not, identify how development will be reallocated.	It is accepted that the delay or cancellation of the Link Road will have a major impact on the strategy for Bexhill and especially on the ability to grow to help meet its objectives. Given that the capacity for growth in each settlement has been carefully established, it would not be appropriate to reallocate any shortfall that were to arise in Bexhill as a consequence of such an event to other settlements. For Bexhill itself, the impact of such delays it set out both in terms of what will continue to be promoted, and that which will not, with the precise scale and location of growth will be determined as part of the site allocations process.
Employment potential	Will there be the jobs to support growth and how will they be delivered?	Both SEEDA and Sussex Enterprise broadly support the employment land provisions, while every effort is made in the Core Strategy, including through retention of existing sites, seeking mixed residential and business developments wherever practicable, and facilitating home working, to assist deliverability.

Plan Period:

- 2.45 The central role of the Core Strategy is to set an overall vision for how the district, and places within it, should develop, supported by clear objectives and a delivery strategy.
- 2.46 A sufficiently long-term view is appropriate for an enduring vision. PPS12: Local Spatial Planning states, at paragraph 4.13: *'The time horizon of the core strategy should be at least 15 years from the date of adoption.'*
- 2.47 The South East Plan runs to 2026, and previous Core Strategy consultations on Issues and Options and on Strategy Directions have followed suit.
- 2.48 However, delays in the production of the Core Strategy have meant that adoption is now not anticipated until late 2012. This would provide a plan period of only 14 years.
- 2.49 A slight extension of the Plan period to accord with PPS12 will not impact materially on the vision, strategic objectives, spatial distribution of development or core delivery policies. It may well impact somewhat on the overall quantum of development to be planned for, but not necessarily on the rate of development.
- 2.50 Therefore, it is proposed that provisions for housing in this Paper relate to the period to 2028 (and that the Core Strategy timeframe is similarly updated).
- 2.51 A statistical baseline date of 2006 is retained, to enable benchmarking against the current South East Plan housing targets, while the most up-to-date housing supply figures, which are for 1st April 2011, are used to identify future housing requirements stemming from the proposed strategy.

3. Methodology

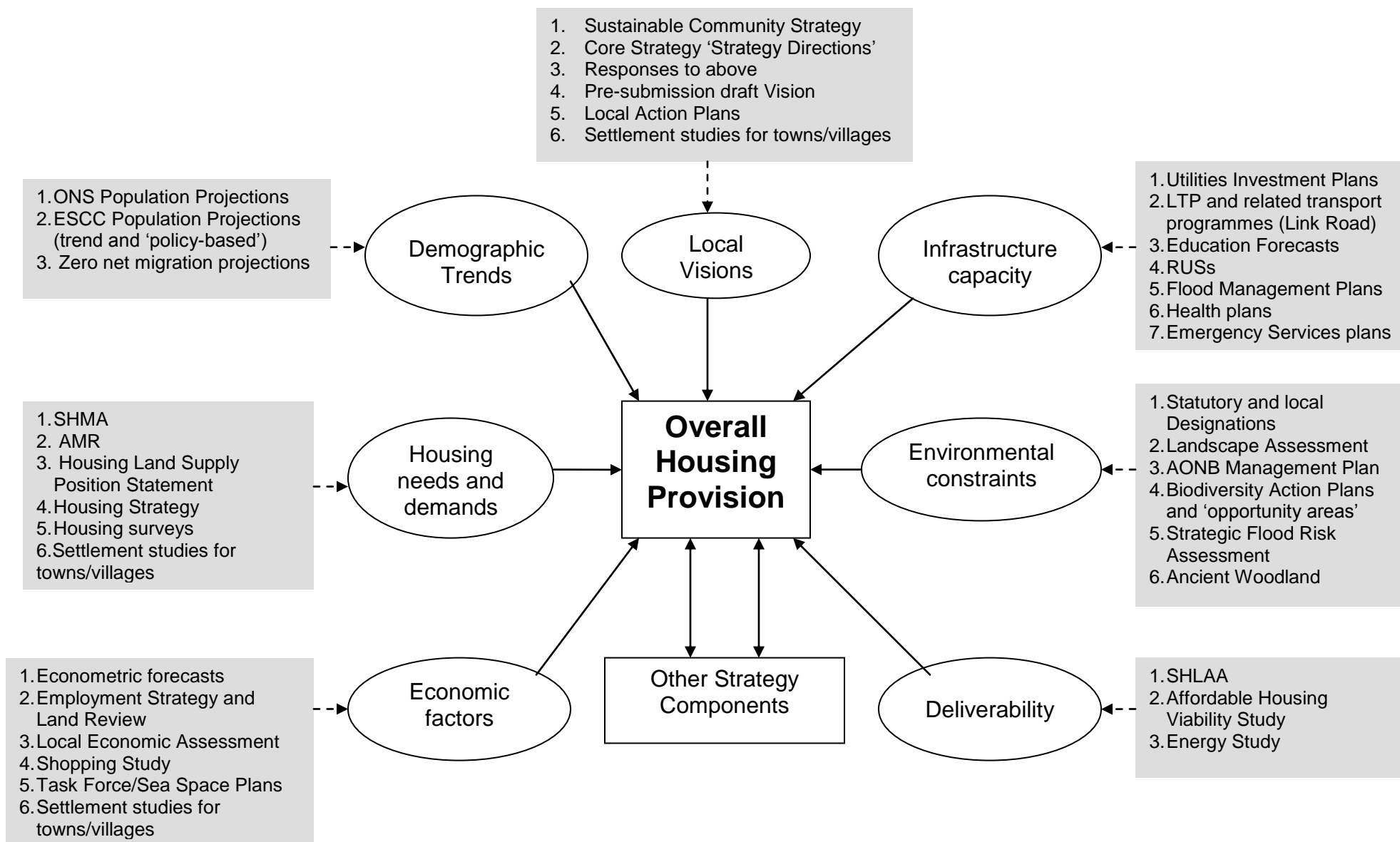
- 3.1 The approach adopted to assessing the most appropriate level of housing growth within the district is to consider, and carefully balance, a range of factors.
- 3.2 Central to the assessment is the '**vision**' for the area. The Core Strategy will look at least 15 years ahead and it is important that development, including for housing growth, is guided by a clear vision.
- 3.3 Early plan-making stages developed, and consulted upon, a vision both for the district as a whole and for the towns and rural parishes within it. The '*Vision for Rother District*' that is set out in the Core Strategy, together with the priorities that communities have for their areas (as highlighted in Local Actions Plans), is therefore at the heart of the determination of appropriate housing growth.
- 3.4 The supply of housing land needs to recognise and respond to the ongoing demand for housing arising from household growth at the national and sub-national level, which manifests as pressure for in-migration, as well as local housing needs. Nor can housing provision be seen in isolation from the ability of the area to develop its economic base, or the need to provide the job opportunities that will support sustainable growth and the overall prosperity of the area. These factors are regarded as the '**drivers**' for change and growth.
- 3.5 Sustainable development involves consideration of the **capacity** for growth. This embraces both environmental capacities and the capacity of existing and planned infrastructure to serve such growth.
- 3.6 Most notably, Rother is overlain by international ecological designations, within (and close to) which development is severely limited, being only that which is compatible with maintaining those nature conservation qualities. Also, over 80% of the district lies within the High Weald Area of Outstanding Natural Beauty, conservation of which is a national priority.
- 3.7 In terms of infrastructure, the capacity of the road network has been, and continues to be, a critical issue affecting Bexhill and Hastings in particular.
- 3.8 Finally, any theoretical capacity for development has to be considered against the availability of suitable opportunities, as well as against the willingness of the market to bring forward development.
- 3.9 Figure 1 overleaf illustrates the scope of the above considerations, which are examined in turn in subsequent sections.

Figure 1

Drivers

Vision

Capacity

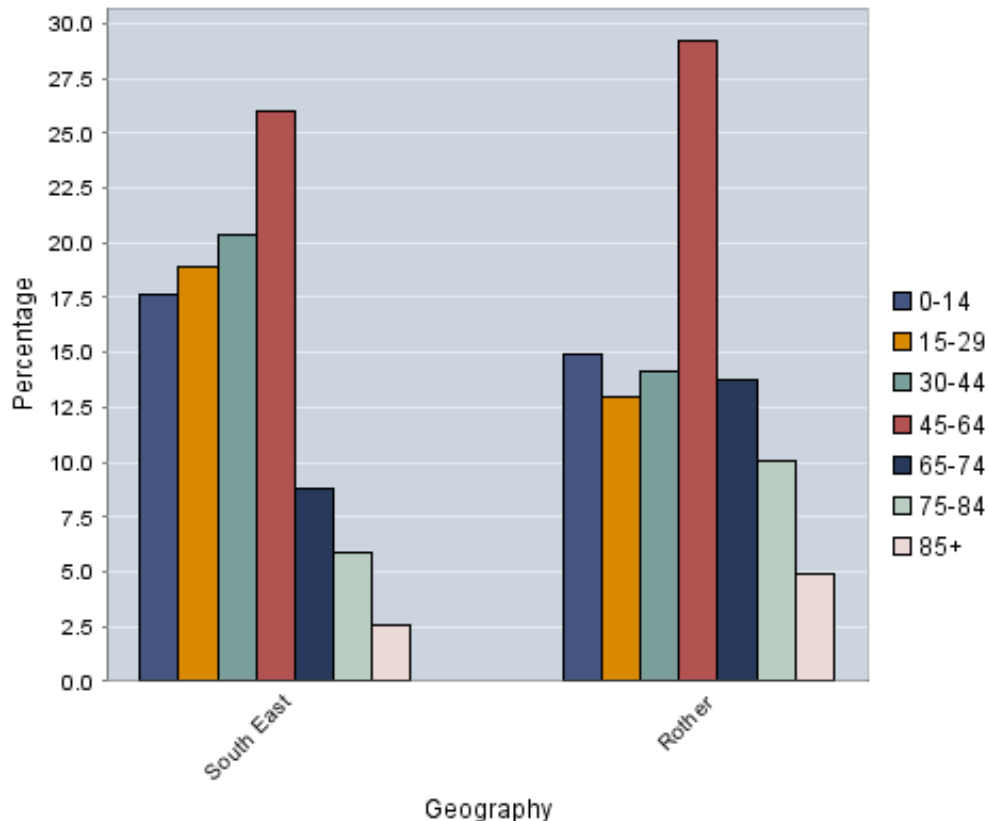


4. Demographic Factors

Population Characteristics

- 4.1 The figure below show the current (2010) population profile for the district¹⁴. The highest proportion of people is in the 45-64 age group, which is common and associated with the 'baby boom' generation.

Figure 2: Comparison of South East and Rother Population by Age Group



- 4.2 However, the district also has a very high proportion of older people (65+) compared to the wider South East, although not too much greater than in East Sussex as a whole.. This is a long-standing, distinguishing characteristic, but it is noted that it is far more pronounced in the coastal parts of the district, than in the inland rural parts, where more typical age profiles are found.

Population Trends

- 4.3 Rother's population grew by 5.1% between 2001 and 2010, from 85,471 to 89,817 people. The greatest increases were in people aged 45-64 years, with

¹⁴ All statistics are taken from the 'East Sussex in Figures' website unless otherwise stated.

smaller increases in the numbers of people over retirement age and aged 16-29. There has been an actual decline in people aged in the 30-44 year age group.

4.4 In terms of net movement into the district, the [SHMA, 2010](#) identifies both families and older age groups as the main in-movers in recent years, with the greatest number being aged 45-64 years.

4.5 The district's population is projected to rise steadily to 92,174 in 2026, an increase of some 2,250 people from 2011. In line with wider trends, most of this accounted for by a rise in numbers of older persons, especially in people aged 75+. Indeed, there are projected increases in both 4-64 and 65+ age bands. A continued fall in numbers aged 30-44 is projected.

Figure 3: Rother All Ages 2006-2026

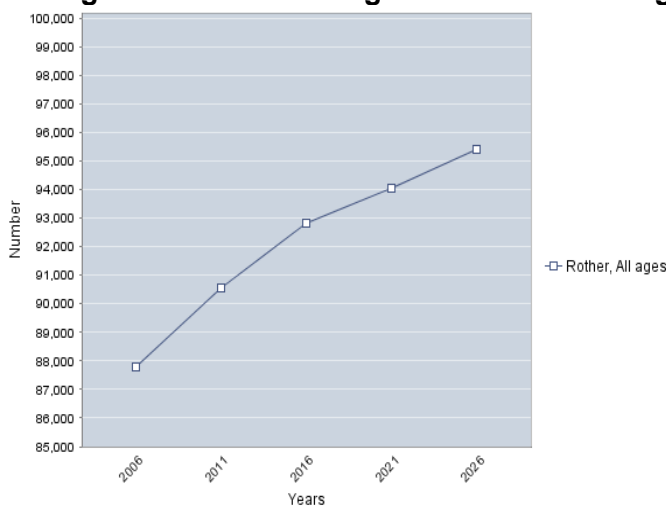
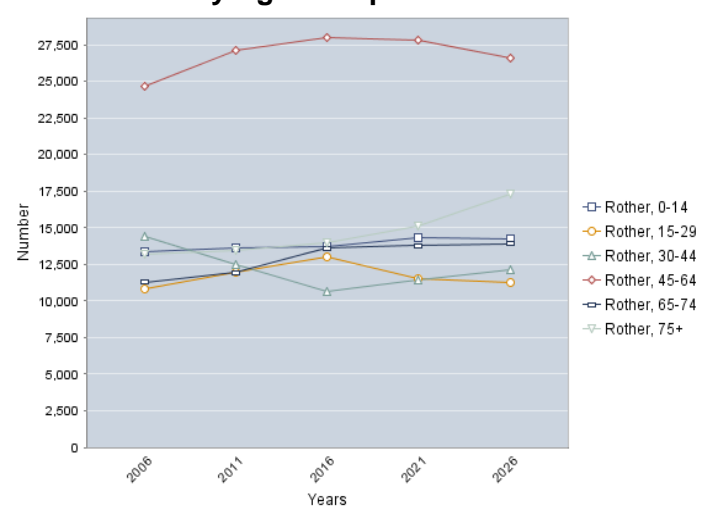


Figure 4: Rother by Age Group 2006-2026



4.6 It is important to note that these are 'policy-based' projections. That is to say they are based on not only on the impact of projected levels of fertility, mortality and migration for the current population, but also take into account the level of housing being planned across the district.

4.7 If the projections were not limited by the level of housing growth set out in the South East Plan, but were based on trends, then the overall population increase would be greater. It would increase to 104,600, a significantly greater increase than the policy-based figure. The age distribution would be broadly similar to that of the policy-based population projections, albeit the former projection tempers some of the changes.

4.8 Conversely, if no provision was made for migration, the population of Rother would actually decline, by a substantial amount – 12,000 people. This is because Rother, with 29% of people over 65 years of age, has virtually no locally-generated requirement for additional housing.

- 4.9 Basically the demographics of the district are such that natural change alone amongst existing residents (i.e. births and deaths) would more than offset any housing that would otherwise be required as a consequence of falling household sizes.
- 4.10 As the age structures of the projection shows, without continued net in-migration, Rother would have an unsustainable demographic make-up, with an increased retired population and far fewer persons of working age. Indeed, without in-migration some working age groups would fall by as much as 50%. The likely affects of this would be real harm to the local economy and the viability of many key supporting services.

Figure 5: Age Structure Based on Policy-based Projections

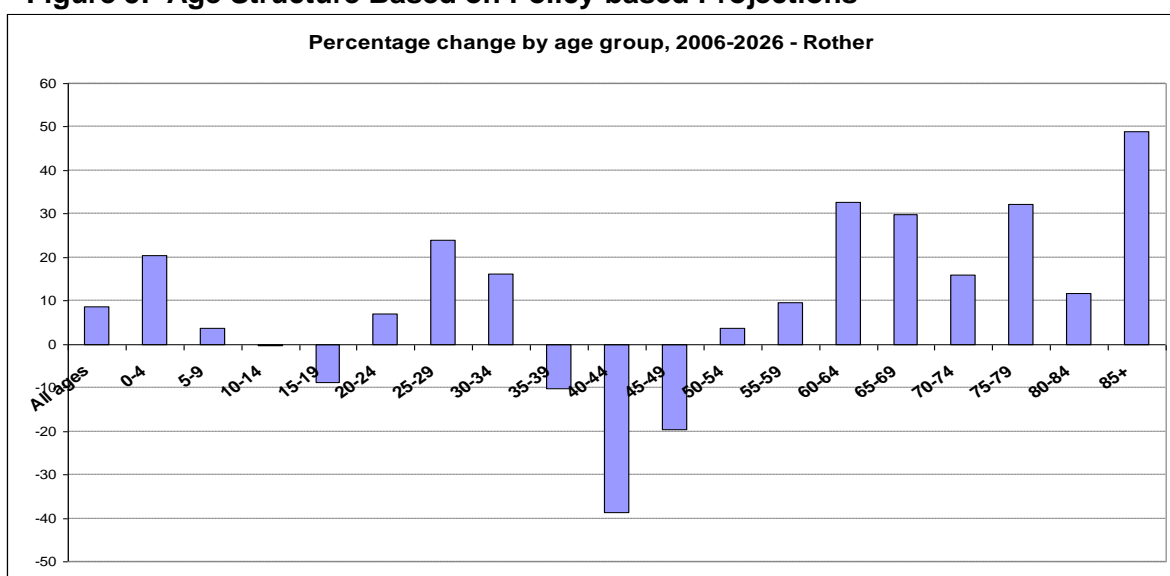


Figure 6: Age Structure Based on Trend-based Projections

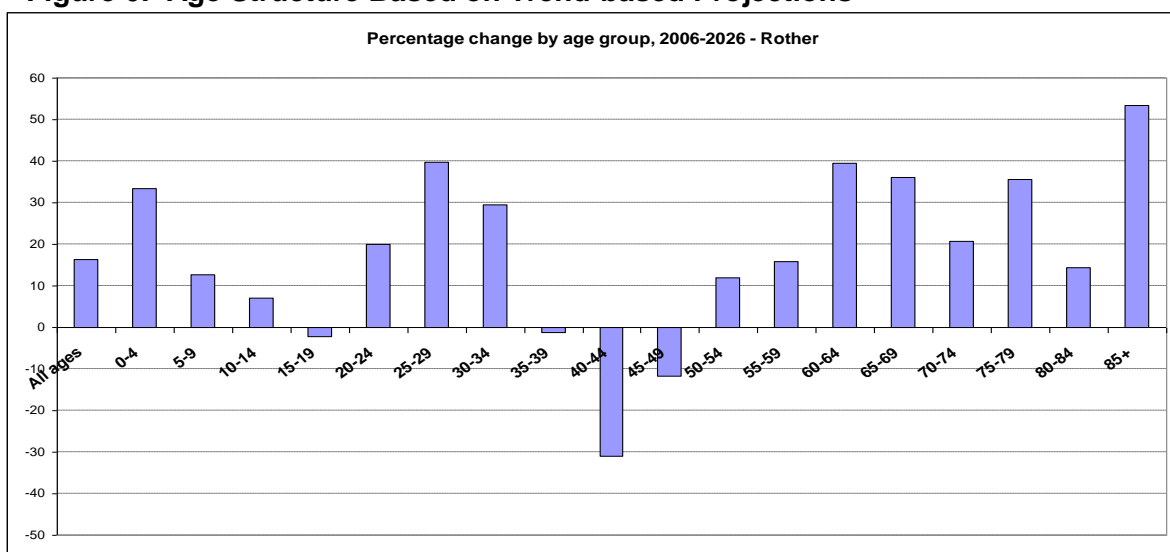
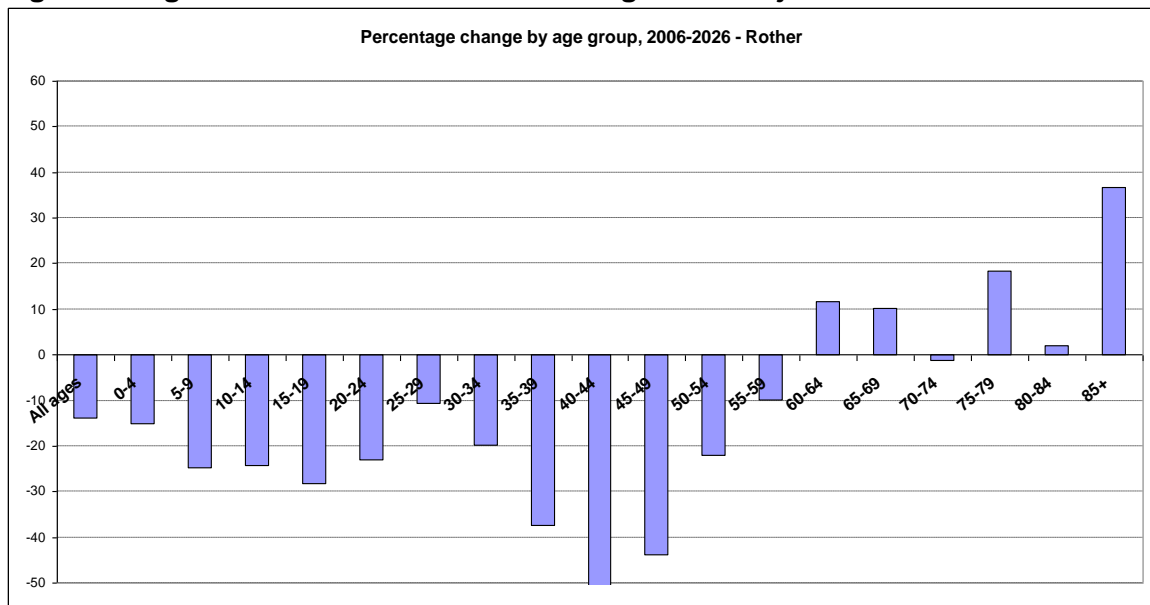


Figure 7: Age Structure Based on No Net Migration Projections



- 4.11 Housing pressures are discussed further in the following section, as is the impact of demographic change on the housing needs and demands of existing residents.

Household Characteristics

- 4.12 There are an estimated 41,175 households in Rother in 2010 (ESiF). These are mainly (54%) comprising couples, while 36% are one-person households. There are relatively few other multi-person households.
- 4.13 Household earnings in Rother are lower than the East Sussex average, which are themselves notably than in the wider South East.

Figure 8: Households in poverty, 2005-2010

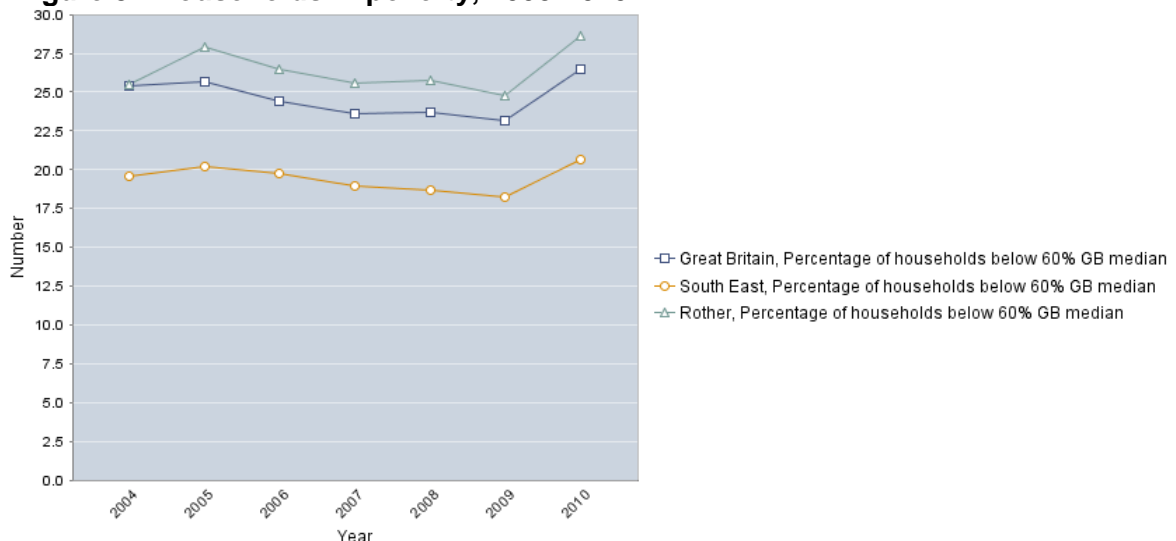
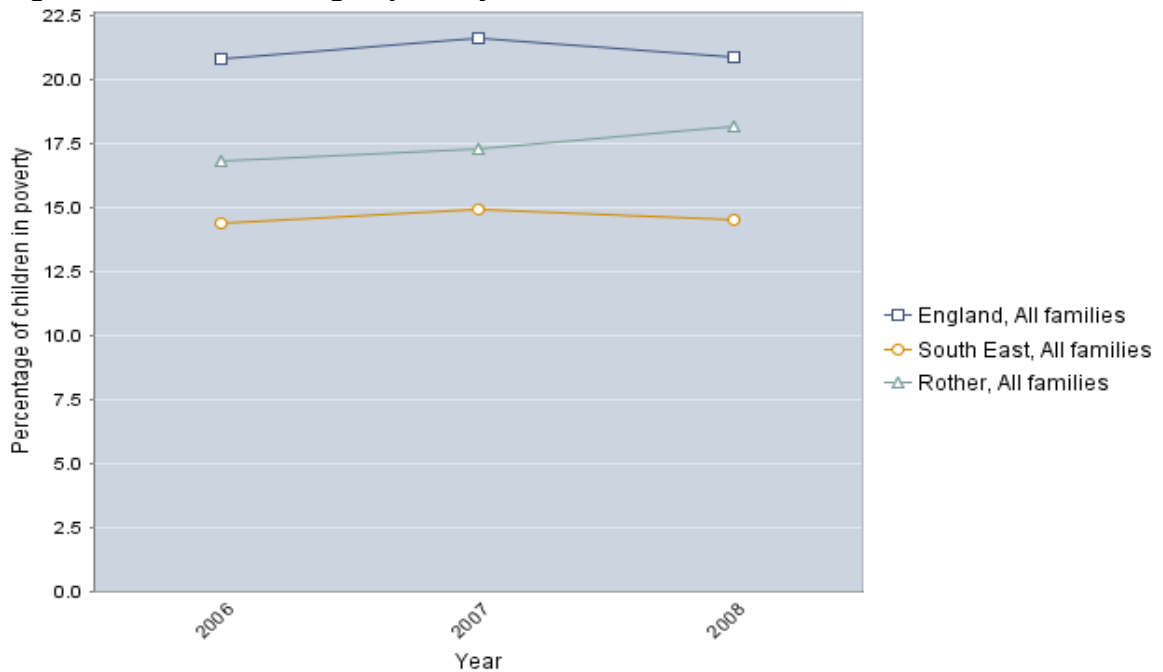


Figure 9: Children living in poverty, 2006-2008

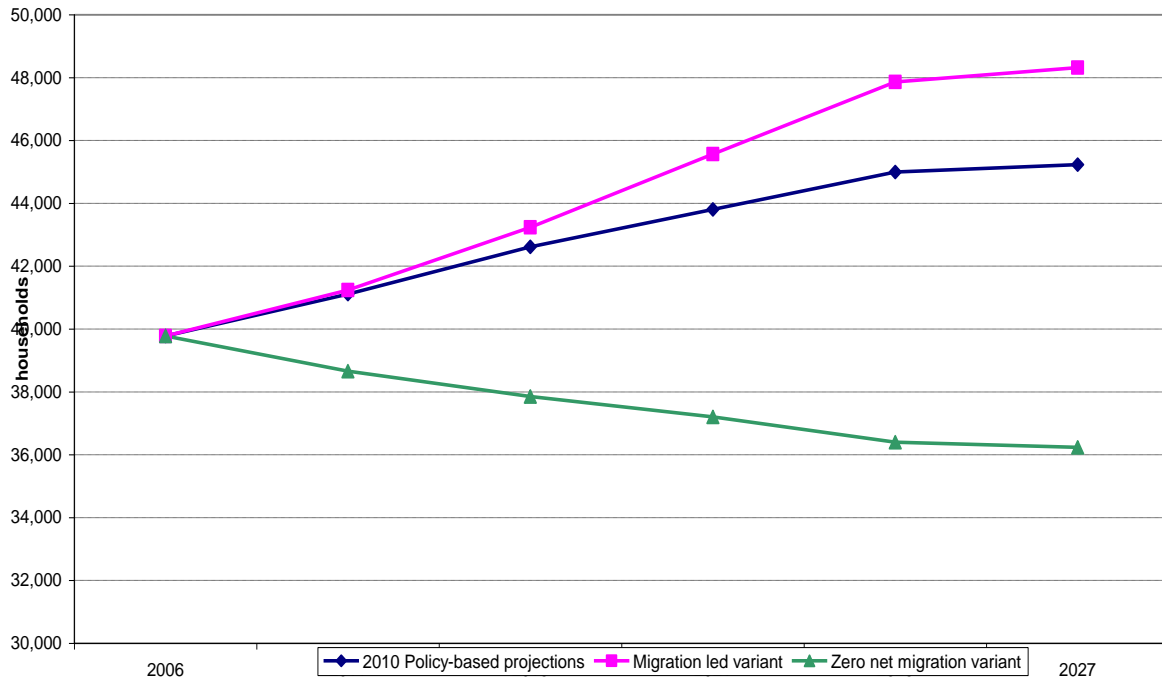


- 4.14 The implications of household incomes on the affordability of housing is considered in the following section.

Household Projections

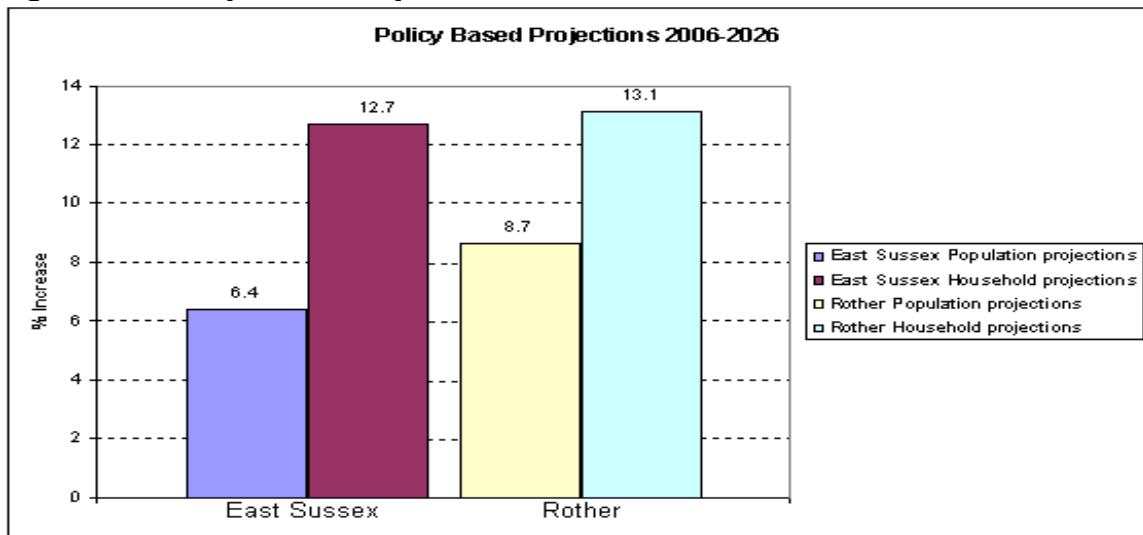
- 4.15 The SHMA, 2010 contains household projections by type to 2026. The overall increase of 5,220 households 2006-2026 corresponds closely with the planned level of housing.
- 4.16 The graph below shows the differences between the 'policy-based' projections and the higher 'trend-based, and lower 'zero net migration' ones.

Figure 10: Differences Between Policy and Trend Projections and Zero Net Migration



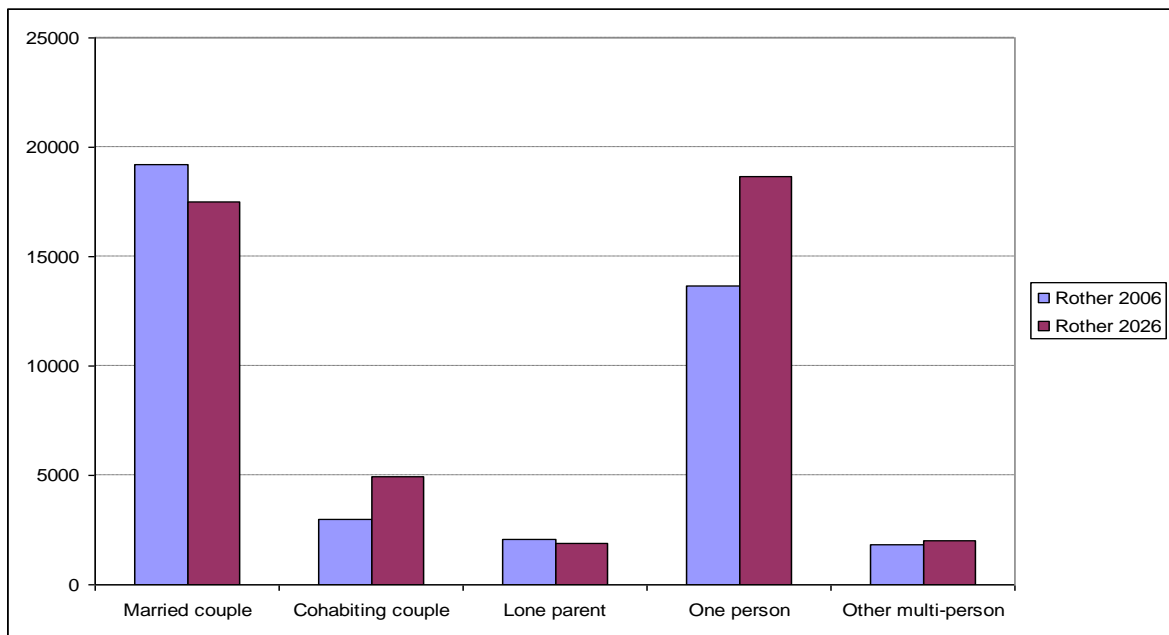
- 4.17 Comparison of the respective population and household projections shows a relatively smaller growth in population than in households for the same projection. This is illustrated for the 'policy-based projection below.

Figure 11: Policy Based Projections 2006-2026 East Sussex and Rother



- 4.18 The SHMA, 2010 contains household projections by type to 2026. The overall increase of 5,220 households 2006-2026 corresponds closely with the planned level of housing.
- 4.19 Of interest, is the increase in one-person households, although family-type households will remain the largest group up to 2026. Most single person households will be older person households, reflecting the ageing population profile.

Figure 12: Types of Household in Rother 2006 Compared to 2026

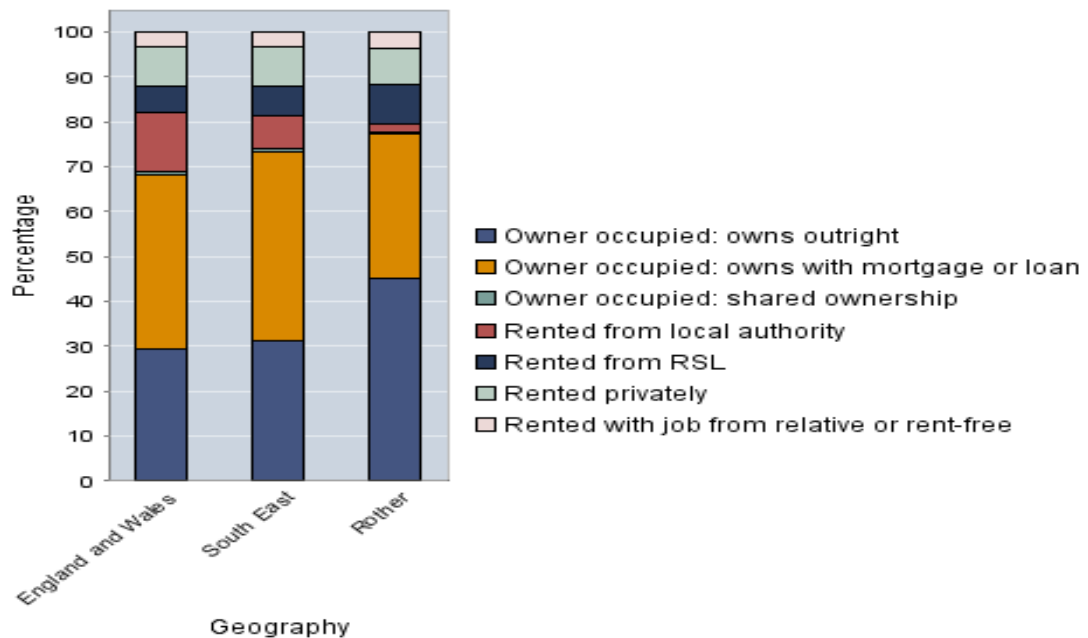


5. Housing demands and needs

Housing Stock

- 5.1 Rother has a high proportion of owner-occupation and a correspondingly low proportion of public/RSL rented housing stock when compared to the national and regional averages.

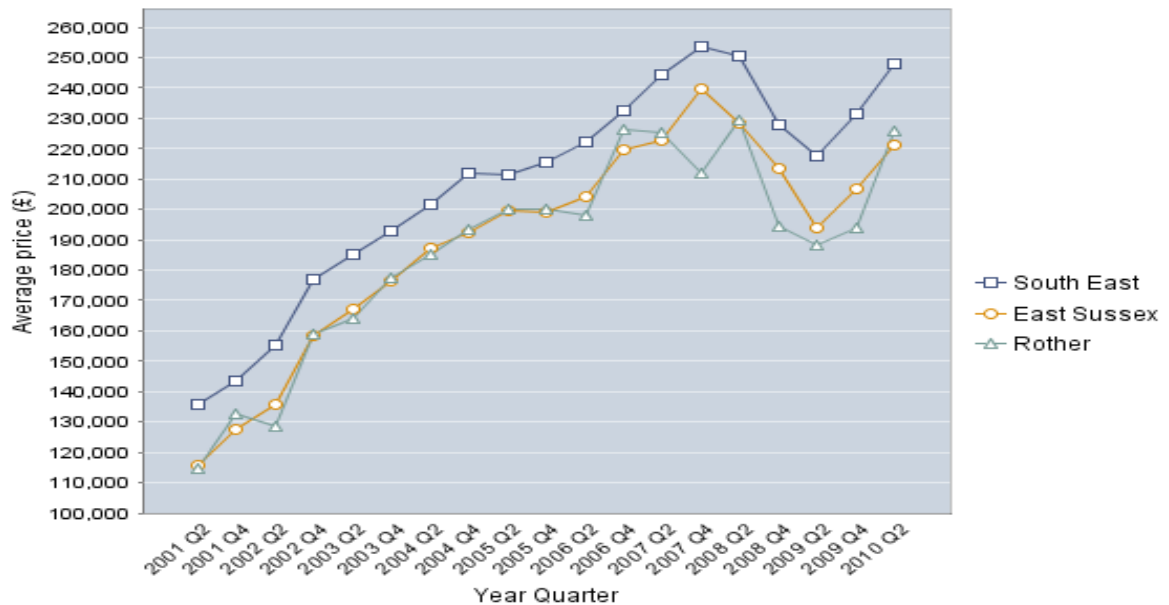
Figure 13: Households Comparing Rother, South East & England & Wales



Housing Market

- 5.2 The SHMA, 2010 shows that average house prices in Rother are actually lower than the County and South east averages. However, following the credit crunch in 2008, prices have dipped somewhat. Details in the SHMA are illustrated below.

Figure 14: Average House Prices Comparing Rother to East Sussex & South East

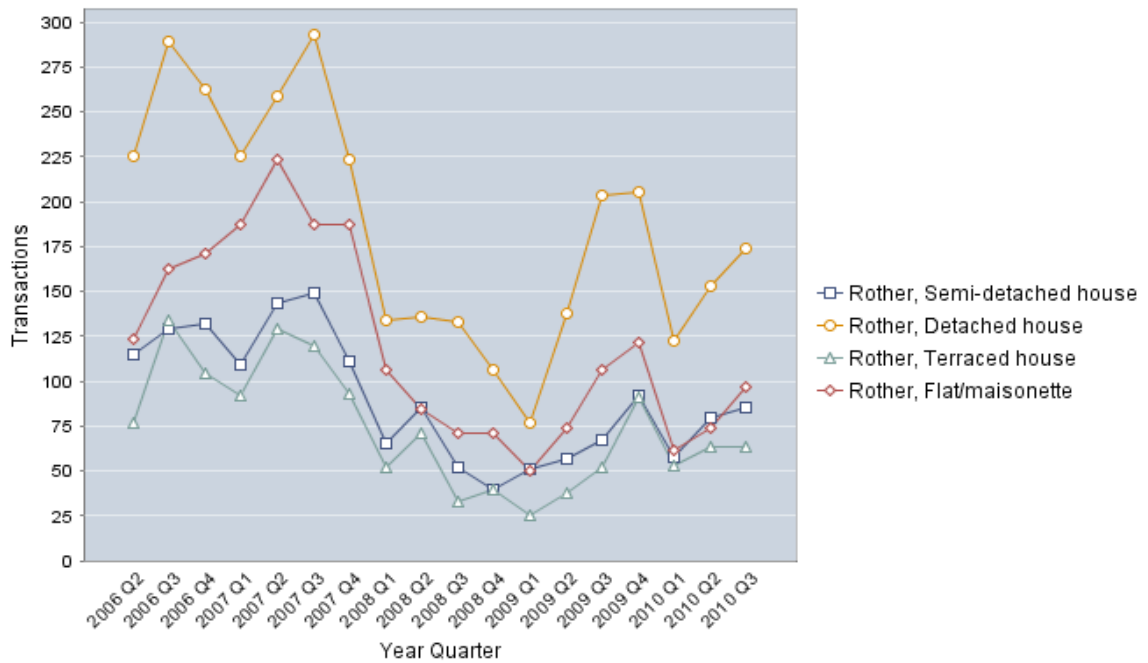


- 5.3 The effects of the ongoing poor economic outlook are also evident in a fall in the volume of sales, exacerbated by more restricted access to credit in the last couple of years, and in house-building activity.

Figure 15: Transactions in Rother 2006 Quarter 2 – 2010 Quarter 3



Figure 16: Transaction in Rother by Housing Type 2006 to 2010



5.4 Figure 16 shows that detached houses have consistently been the main source of sales, followed by flats/maisonettes.

5.5 House building rates over a longer time period (1991-2010) have shown similar fluctuations in response to economic conditions, but with the lowest ever number of completions last year. Figure 17 shows completions, with starts in Figure 18.

Figure 17: Housing Completions in Rother, 1999 - 2009

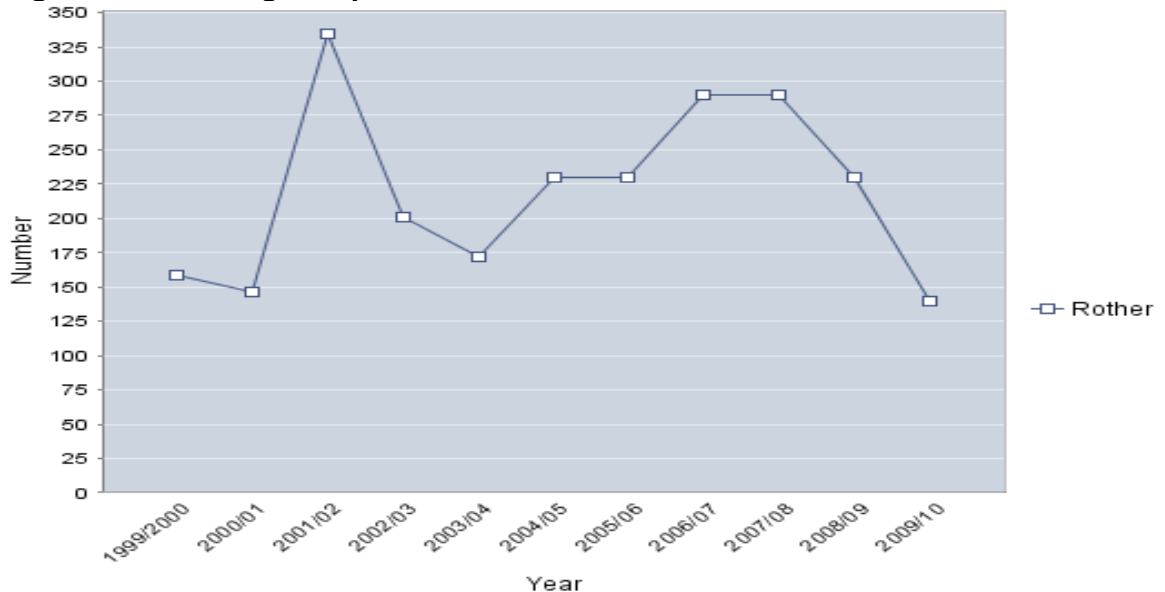
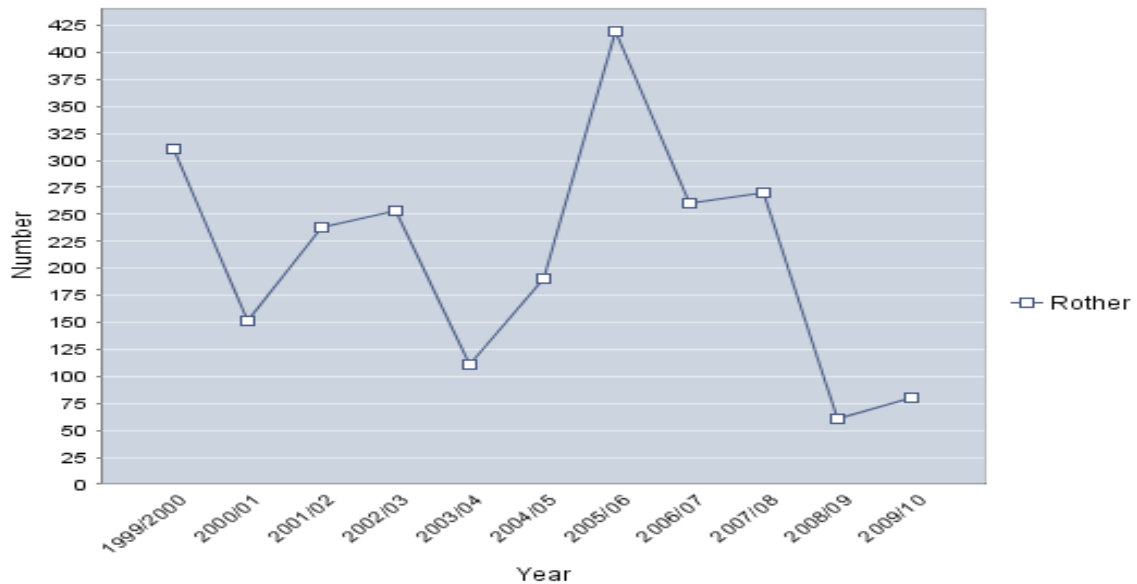
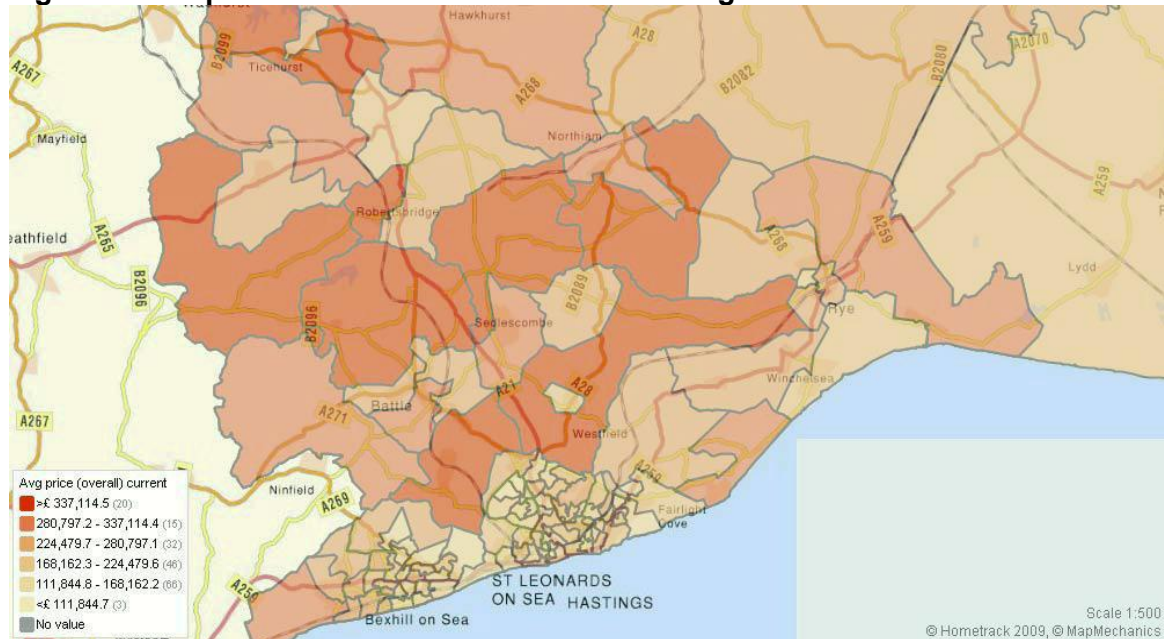


Figure 18: Housing Starts in Rother, 1999 to 2009



- 5.6 It is also evident that the housing market is somewhat stronger in the inland rural areas, especially where commuting is easier, as seen in average house prices

Figure 19: Map of House Prices in Rother & Hastings



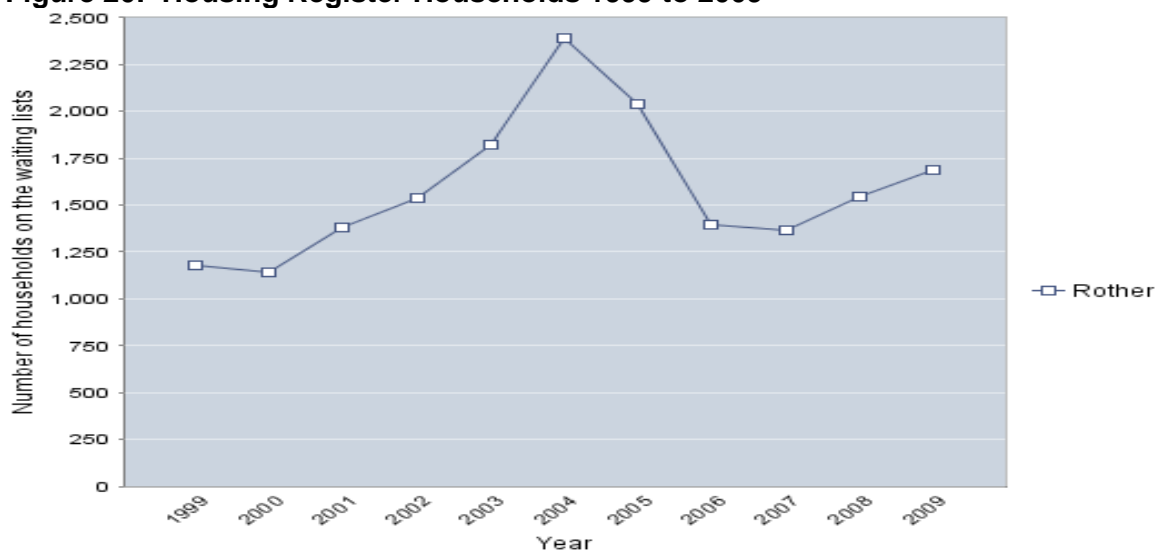
Source: SHMA, 2010

- 5.7 This strong housing market is reflected by the number of small sites in particular coming forward on a regular basis through intensification and redevelopment within existing development boundaries. Regard to such “windfall sites” is discussed further in Section 10: Deliverability.

Housing Need

- 5.8 The need for homes comes from two main sources – local ‘housing needs surveys’ and the Council’s Housing Register.
- 5.9 Evidence from the district-wide Housing Needs Survey in 2005 calculated there was an annual shortfall of 256 properties in Rother and that the need for affordable housing vastly outweighed the supply of affordable housing.
- 5.10 With reference to these figures, DTZ Consultants stated in 2010 that ‘*there is little reason to believe the level of housing need has declined over the last 4 years*’. They suggested this was supported by a range of evidence, including:
- Numbers of households on local authority registers
 - A marked increase in households receiving housing benefit since 2005 (20% up from 2005 to 2009).
 - Recent rise in unemployment.
- 5.11 There are 1,689 households on the Housing Register seeking accommodation in 2009. The number has shown a steady increase since 2007.

Figure 20: Housing Register Households 1999 to 2009



- 5.12 The proportion of households on the Housing Register equates to 4.1% of all households in Rother District.
- 5.13 The preferred location for people seeking affordable housing is shown below:

Affordable Housing Preference within Rother, 2009

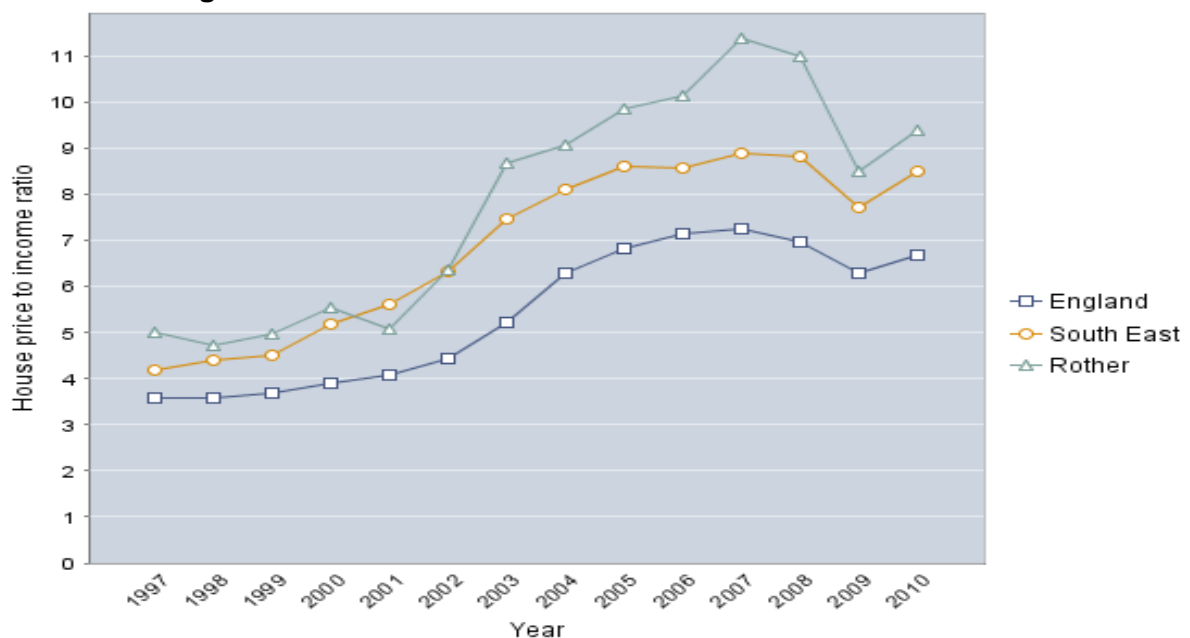
Preferred Area	% of All Preferences Expressed
Battle	8%
Bexhill	32%
Rye	11%
'Rural' Rother	50%

Source: Rother Housing Register, July 2010

Affordability

- 5.14 Analysis by DTZ in the SHMA, 2010 concludes that the recent economic downturn has not yet made a significant impact on the affordability of home ownership. While there has been some reduction in the ratio of house prices to earnings, Rother still has one of the highest ratios – meaning that it is still very difficult for those on low incomes to afford even the cheapest homes in the local housing market relative to county, regional and national averages.
- 5.15 When considering the affordability of homes, attention is focused on figures for the lower quartile, as these relate to people facing most issues about getting on or up the “housing ladder”.
- 5.16 In 2010, the average lower quartile house price is 9.4 times the lower quartile income in Rother. It is also well above the regional and national averages, as shown below.

Figure 21: House Price to Income Ratio 1997-2010 Comparing Rother to South East and England



- 5.17 On this basis, the SHMA 2010 (Figure 4.6) suggests that only about 30% of households in Rother are able to buy. A further 30% may be able to rent privately, but the remaining 40% are unable to rent or buy in the market.
- 5.18 Even though, in practice, some households may have access to equity from savings or property, this may partly explain the out-migration of people in the 15-24 age group from the district.
- 5.19 Further consideration of the need for affordable housing is contained in the 'Affordable Housing Background Paper'.
- 5.20 It is clear from the data on affordability that the severe difficulties in gaining access to housing are as much a consequence of low earnings as of high house prices. This economic imperative and potential for economic growth are examined in the following section insofar as they impact on the most appropriate level of new housing.

Housing Types

- 5.21 The average household size in Rother (in terms of numbers of people) is quite low, reflecting the age structure. Levels of overcrowding are correspondingly low.
- 5.22 While one-person households are projected to increase in Rother, DTZ warns against a conclusion that this means a correspondingly greater need for one-bedroom properties, noting that over half of one person households occupy homes with 2 or more bedrooms in Hastings and Rother.
- 5.23 It is important to remember that the size of home occupied or demanded is dependent on household income and wealth rather than household size. However this does not mean that households in the future will necessarily have access to the same amount of space as households today. If affordability declines, households may be forced to occupy smaller homes than they would otherwise choose. Conversely if household income growth increases over the long term and the propensity of households to spend their growing incomes on housing continues, the size of homes occupied by future households may be larger than today (SHMA, 2010).
- 5.24 Even so, this older, and ageing, age group is likely to have specific housing requirements, with varying levels of support. The desire to support people to live independently may mean that more properties need to be built to 'lifetime homes' standards. This issue is elaborated upon in section 2 of the SHLA, 2010.

6. Economic Factors

- 6.1 New housing both nationally and locally within Rother (and adjoining Hastings) is seen as supporting economic regeneration and growth.
- 6.2 However, the SHMA highlights the inter-relation between different types of housing provision and different demographic changes within an area.
- 6.3 The total number of jobs in Hastings and Rother in 2003 was 29,000 and 23,000 respectively. This is a relatively small scale relative to other labour market areas. Also, the growth in jobs locally (11%) was below that in East Sussex (13%) or the South East (19%). More recent trends show that there has been a slight decline in the number of jobs in Rother since 2000, with an increasing dependence on public sector employment and tourism, whilst manufacturing and financial services have been in decline.
- 6.4 It is notable that the economic activity rate in the Hastings and Rother sub-region is lower than that in East Sussex or the South East, while the rate of unemployment in the area is higher
- 6.5 The low rate of economic activity in Rother may partly be accounted for by the high rate of economic inactivity due to retirement.
- 6.6 It appears that the economy is constrained to a degree by:
- The lack of affordable housing, which impacts on the ability of younger people to live locally and hence on the lower economically active population.
 - Higher levels of housing, and in locations, suited for retired people.
 - A lack of local housing, resulting in labour being drawn into the District, for example from Hastings.
 - A general lack of investment and spending power as a result of a relatively static, and non-income earning population.
- 6.7 The potential for economic growth is considered further in the ‘Hastings and Rother Employment Strategy and Land Review’. This takes an essentially “needs-based” approach to employment land provision in the district. Among its conclusions, it:
- Identifies a need for some 94,000 sq m of employment floorspace for the period 2006-2026.

- Recommends that this be increased to 100,000 sq m in recognition of the strategic site at North east Bexhill (with a corresponding reduction for Hastings).
 - Notes that the majority of floorspace growth should be brought forward in the first 10 years.
 - The strategic sites should be available in the 5-10 years period.
 - The distribution of supply is focused on Bexhill (where some 50,000 sq m of a total 60,000 sq m target supply is accounted for by the strategic sites), with locally significant supply also at Rye (10,000 – 20,000 sq m) and Battle (10,000 sq m), mainly at existing sites, and a further 10,000 sq m spread across the rural parts of the district.
 - Mixed-use developments are identified as a means of achieving development
- 6.8 Across the Land Review study area, the overall provision equates to some 10,000 sq m a year. It is appreciated that this well exceeds the 3,000-3,500 sq m per annum growth rate based on recent market trends.
- 6.9 While the higher planned floorspace growth responds more to ongoing regeneration initiatives, and aspirations, it is also noted that the relatively weak economic structure is not itself stimulating significant demand for housing.
- 6.10 Hence, it follows that the rate of housing growth should be in step with progress on regeneration projects and job creation. If it were too slow, it could act as a disincentive for suitable skilled workers to move to the area. Perhaps more likely, too great a rate of housing may not be matched by available employment opportunities, and may be more oriented towards a retirement market, contrary to regeneration objectives.

7. Strategic visions and local strategies

Sustainable Community Strategy

- 7.1 The Sustainable Community Strategy for East Sussex 2008-2026, called 'Pride of Place', sets out the vision for East Sussex to 2026: to address the inequalities in the county, and create successful people, successful businesses and a sustainable environment. It is available to view at <http://www.essp.org.uk/essp/esiscs.htm>
- 7.2 Local priorities are around supporting children and young people, community safety, cultural and leisure activity, reducing environmental impacts, employment and skills, health improvement, tackling congestion, affordable housing and sustainable construction.

Emerging Core Strategy

- 7.3 The 'Core Strategy – Consultation on Strategy Directions' sets out a draft vision for the district in 2026. This is:

Rother District will be recognised for its high quality of life where there is a strong emphasis on community life. This will have been achieved by continuing to support, and further develop, vibrant, safe, balanced and inclusive communities.

Sustainable economic growth will have been secured, with much improved job opportunities, which encourages young people to stay in the area and provides greater prosperity for all.

Improved economic and social well-being will also be facilitated by better access to jobs and services for all ages, in both urban and rural areas, and improved connectivity with the rest of the region.

The area's outstanding environmental and cultural assets will continue to be highly valued and conserved. Sensitive stewardship of environmental resources will be integral to a local commitment to a more sustainable future and a responsible, positive approach to helping address climate change issues.

Development and change will have contributed significantly to meeting local needs and aspirations. It will have responded positively to the area's particular local circumstances and environmental resources, as well as according with the South East Plan.

Bexhill will have retained and strengthened its distinct identity and become one of the most attractive places to live on the south coast - attractive to families, the young and older people alike. As the main focus of development in the district, it will be playing its part within an integrated approach to securing a more prosperous future for the Bexhill and Hastings area.

Battle continues to be a thriving small market town and tourist centre which retains its essential character, with sensitive conservation of its historic core and setting.

Rye has improved economic and social circumstances, with a stronger and more sustainable market town role, tourism sector and Port. This will have been achieved whilst fully respecting and sensitively managing its historic character, vulnerability to flooding and ecologically important setting.

Rural areas of the district will have evolved “organically” in a manner sensitive to their essential character, diversity and relationship with their surroundings. Villages will be vibrant and inclusive, while the countryside will be economically active, accessible and well-managed.

7.4 It can be seen that the priorities vary somewhat in different parts of the district:

- **For Bexhill**, the clear focus is on regeneration and economic improvement, to which a link may be made with housing for families and young adults
- **For Battle**, there is a recognition of its general buoyancy, but also the great importance attached to the conservation of its sensitive environment, which sets a real cap to housing growth
- **For Rye**, it is the socio-economic agenda that is to the fore, with housing growth being greatly constrained by environmental imperatives
- **For the villages**, there is a recognition of the demand for housing and the part this can play in furthering local priorities in a sustainable way, which includes limiting the rate of growth in any individual village

Housing Related Consultation Responses

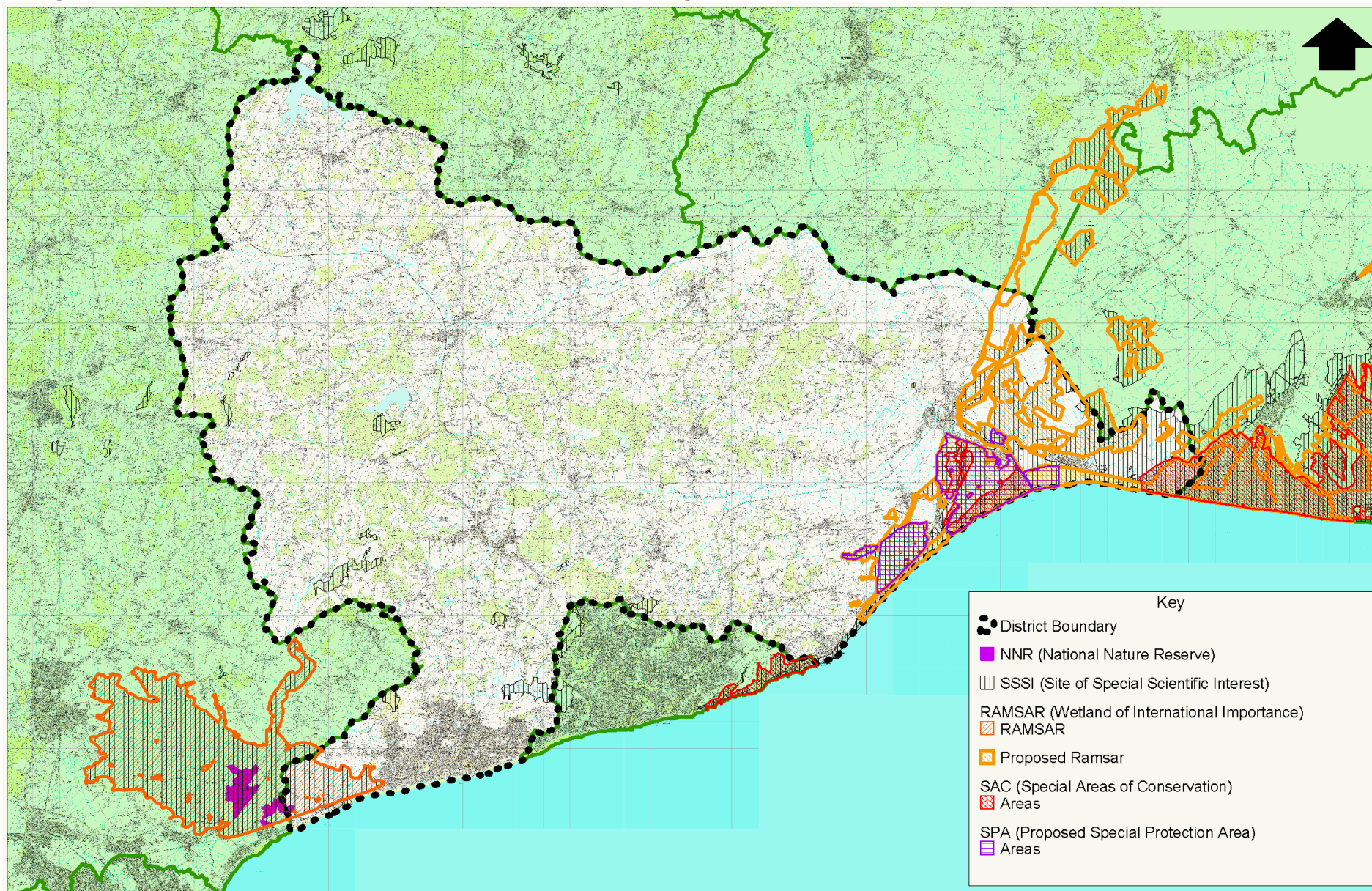
7.5 A summary of all responses are contained in the Consultation Statement, while all specific representations, and the Council's responses can be viewed at www.rother.gov.uk/corestrategy. The nature of responses generally reflected the perspectives/interests of organisations and individuals.

8. Environmental Factors

- 8.1. As the 'vision' reproduced in the previous chapter highlights, the outstanding environmental assets of the district are integral to the quality of life it offers.
- 8.2. The key environmental designations are shown on Figures 22-24 below. It can be seen that these have varying impacts on the towns and villages of Rother.
- 8.3. The large areas of international nature conservation importance that straddle administrative boundaries at the south-eastern and south-western ends of the district have necessitated 'Appropriate Assessments' in respect of the implications of emerging Core Strategy policies for both the Pevensey Levels 'Ramsar' site, and the combined area of the 'Special Protection Area' (SPA) and the 'Special Area of Conservation' (SAC) between Dungeness and Pett Level, and a proposed Ramsar site.
- 8.4. The eastern designations have implications for both the quantum and location of development at Rye, as they are close to the southern and eastern edges of the town, and have a particular impact on the growth of employment and port activities at Rye Harbour.
- 8.5. The distance between the Pevensey Levels 'Ramsar' site and Bexhill should allow for mitigation of potential implications of growth of the town. Even so, the western part of the town is relatively close and drains into the Levels.
- 8.6. Aside from these designations, housing development along the coast must also be considered in the context of flood risk. As Figure 24 shows, Rye is especially affected, the Citadel being a peninsula of high ground extending from the High Weald to the north. Other coastal communities are also affected, including Camber, Rye Harbour, Winchelsea Beach and Pett Level and, to a lesser extent, the coastal fringes of Bexhill.
- 8.7. Further detail on flood risk is contained in the [Strategic Flood Risk Assessment](#).
- 8.8. The other critical environmental designation is that of the High Weald Area of Outstanding Natural Beauty (AONB). As Figure 22 shows, this covers all the inland areas of the district, extending down to the western edge of Rye and Walland Marsh in the east, and to the south of Battle as far as Crowhurst and Catsfield. In all, it covers 82% of the District.
- 8.9. The existence of the AONB was recognised as imposing a significant constraint on the overall quantum of housing in the 'rest of Rother' area in the South East Plan during preparation of South East Plan.

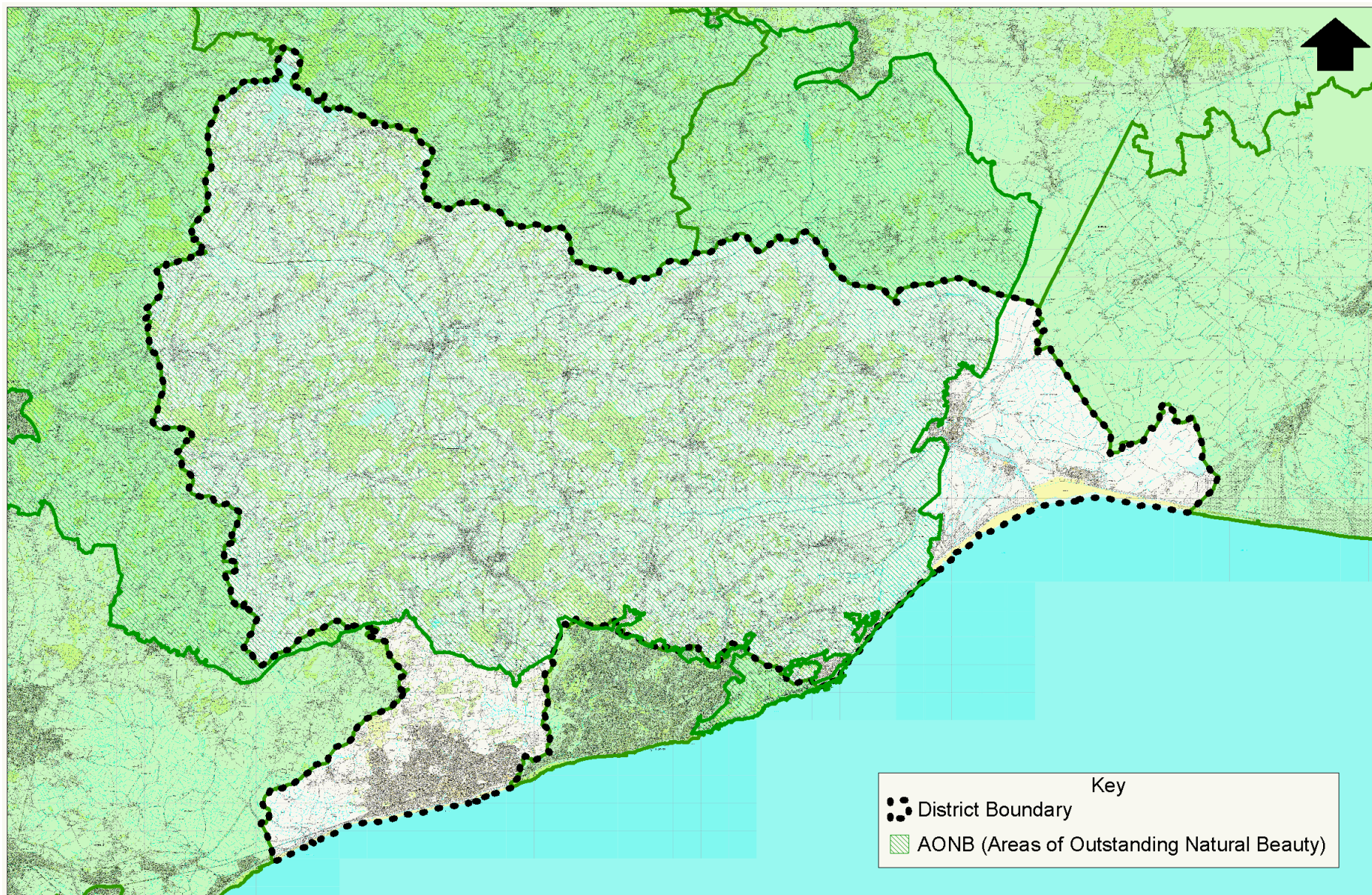
- 8.10. At the examination into the South East Plan, the Inspector accepted that a total of 1,600 dwellings 2006-2026 was appropriate notwithstanding objections seeking a higher level.
- 8.11. Other designations have implications for individual settlements and parts of settlements, including Sites of Special Scientific Interest (SSSI), Sites of Nature Conservation Importance (SNCI), Conservation Areas (covering the historic cores of Battle, Bexhill and Bexhill Old Town, Burwash, Northiam, Robertsbridge, Rye, Sedlescombe, Ticehurst and Winchelsea). There is also the Registered Historic Battlefield at Battle.
- 8.12. Also significant is the extent of ancient woodland, covering about 15% of the District. This is a priority habitat as well as being important in cultural and landscape terms.

Figure 22: National and International Nature Conservation Designations



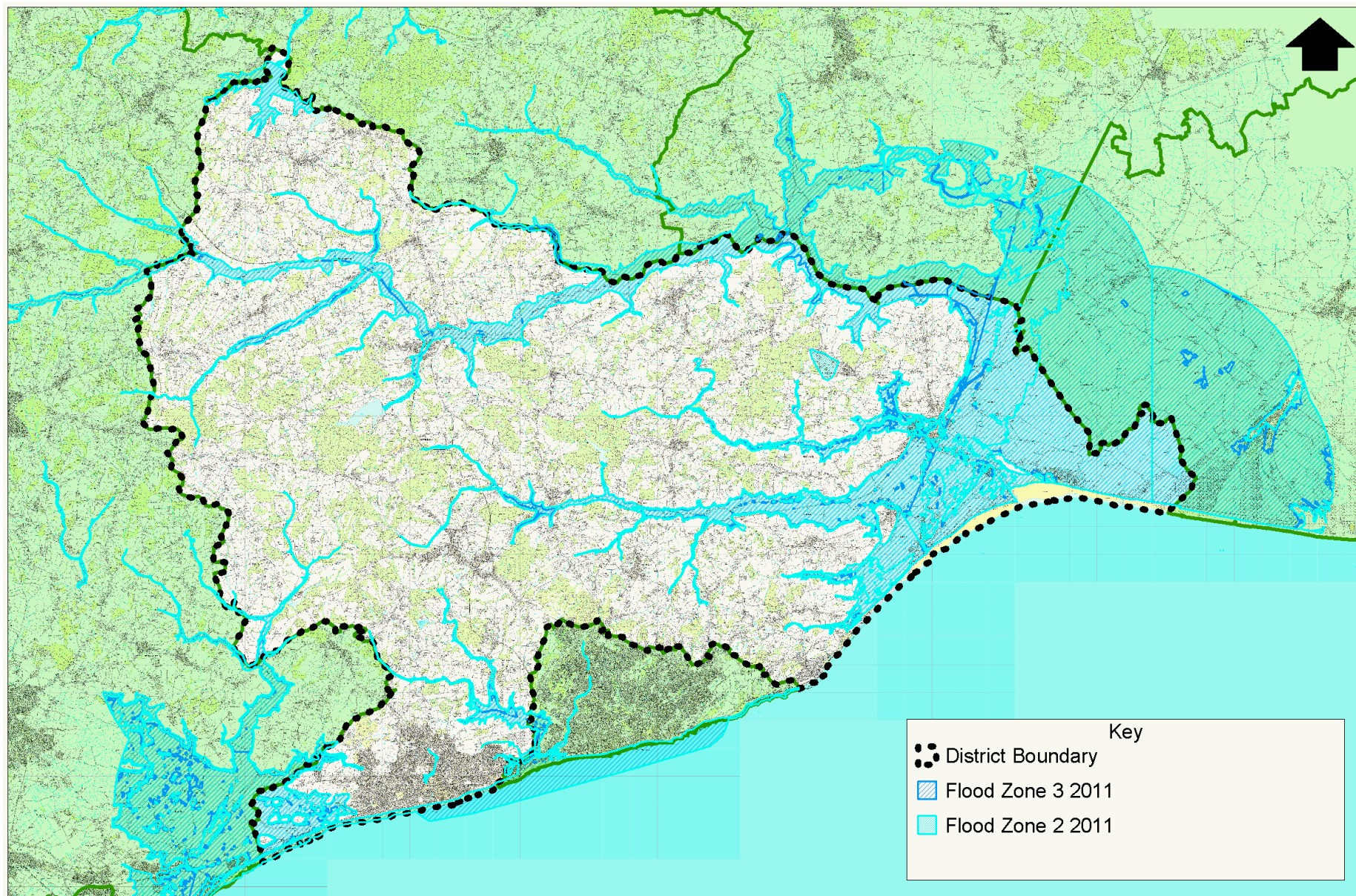
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Figure 23: Area of Outstanding Natural Beauty



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Figure 24: Flood Risk Areas



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9. Infrastructure Capacity

- 9.1 As noted in Section 2, the Council has always been keen to ensure that sufficient infrastructure is available to satisfactorily accommodate new development. Of most fundamental significance is the proposed Bexhill Hastings Link Road, for the reasons set out below.

Bexhill Hastings Link Road

- 9.2 The significance of the Link Road derives from the fact that the Highway Authorities have advised that there is only very limited capacity for Bexhill to grow due to the fact that the eastern end of the A259 through the town, and its continuation into Hastings, is already over-capacity, with consequent congestion at peak times and, increasingly, through the day.
- 9.3 In response to the South Coast Multi-Modal Study in 2003, which looked at transport needs, both road and rail, along the A27/A259 corridor, the Secretary of State asked East Sussex County Council to draw up plans for the Link Road.
- 9.4 These were done, options were consulted upon in 2004 and a planning application duly submitted. Permission was finally given in December 2008.
- 9.5 The County Council subsequently sought to acquire the necessary land at a CPO Inquiry in late 2009. However, the decision is awaited.
- 9.6 It appears that confirmation of the CPO is effectively awaiting a decision by the Secretary of State for Transport on funding.
- 9.7 At this point, the Link Road is one of many transport schemes now competing for Government funding, and a decision is not due until the end of 2011.
- 9.8 At the time of advising on housing potential for the South East Plan, it was assumed that the Link Road would be built by 2010. The County Council subsequently updated its advice, and at the time of preparing the 'Consultation on Strategy Directions', it advised that it expected construction by the end of 2012/early 2013.
- 9.9 It is clear that, with Bexhill being identified as the only settlement with significant growth potential, transport capacity permitting, the continuing uncertainty over the Link Road may ultimately mean that the District's housing figure needs to be re-considered. Indeed, even with an early, favourable decision, the level of completions at Bexhill will have fallen behind that assumed for several years.
- 9.10 Logically, the prolonged absence of the Link Road will also impact on Hastings. It would also affect Battle indirectly insofar as it is forecast to provide a degree of

relief to the High Street from through traffic. This may have an influence on the scale and location of growth and/or the need for traffic management measures.

- 9.11 Delay in building the Link Road is not expected to have direct development implications for Rye or the Parishes.
- 9.12 However, in as much as the Link Road opens up the one strategic employment site intended to serve both Bexhill and Hastings, delays in construction will have a substantial knock-on effect on the regeneration prospects of the towns and, in that they are the centre of the local labour market area, on the wider area.
- 9.13 Hence, the effect would still be expected to be felt across most of the district, in terms of:
- Demographic trends (with less attraction for young people to stay in the area);
 - House prices (which may attract more older in-migrants looking to “down-size”);
 - Household incomes (with increasing levels of poverty)
- 9.14 The direct impact of the Link Road on the scale of development at Bexhill and Hastings has been the subject of traffic modelling work. This is elaborated upon in the Bexhill Town Study. In summary, it identifies that there will be further capacity pressures without the Link Road by 2016, having allowed for the development of existing permissions. This tends to confirm the earlier advice of the Highways Agency that any significant development in Bexhill requires capacity increases. It also shows that while the Link Road should enable the already planned strategic development and some additional peripheral development to proceed, there will be some residual points where capacity remains an issue, and which will need further attention through forms of complementary measures and/or junction improvements. The location of development in relation to jobs and services will also be important.

Other infrastructure

- 9.15 Aside from the Link Road, the Core strategy now needs to move forward in the context of some key strategic road and rail improvements not now progressing. Most notable are the cancellation of:
- The Baldslow Improvement (– a road scheme linking the A2100 to the A21, thereby improving conditions on The Ridge and complementing the Link Road),
 - The A21 Kippings Cross to Lamberhurst improvement scheme,
 - The A21 Flimwell to Robertsbridge improvement scheme.

- 9.16 In addition, the A21 Tonbridge to Pembury dualling is deferred to at least 2015, pending a review.
- 9.17 Important rail infrastructure improvements, including the Ashford line upgrade, have not been included in the relevant Rail Utilisation Strategies. The potential for new stations will be dependent upon a strong business case being made.
- 9.18 It follows that relatively poor accessibility will remain an issue affecting the local property market. Congestion in the historic cores of Battle and Rye will continue to be a particular concern, for which local mitigation will need to be sought, and to which housing will be likely to need to contribute.
- 9.19 Aside from the Link Road (and environmental imperatives discussed earlier), there are no other “showstoppers” in terms of infrastructure constraints, although provision will require further investigation in respect of individual settlements and sites as part of work on site allocations.

10. Deliverability

- 10.1 The [Strategic Housing Land Availability Assessment](#) (SHLAA), published in March 2010, identified sites with potential for some 6,800 houses across the District by 2026. This is some 20% more than the 5,600 for Rother identified in the South East Plan.
- 10.2 However, it must be recognised that these are subject to further assessment, and consultation, so actual numbers can expect to be reduced.
- 10.3 Subsequent to the SHLAA, 'Town Studies' have been prepared for Bexhill, Battle and Rye. As well as refining the strategies that provide the context for housing provision, these have highlighted some further issues affecting deliverability.
- 10.4 For Bexhill, the Link Road is the critical deliverability issue. In addition, the importance attached locally to improving the local economy at the same time as maintaining the identity of the town represent key considerations for growth. The need for improved town centre performance and leisure facilities are also strategic infrastructure concerns.
- 10.5 For Rye, the Town Study highlights issues with the delivery of existing housing allocations at Rock Channel (minimum 105 dwellings) the former Lower School site (minimum 32 dwellings), and at Rye Harbour (minimum 16 dwellings). None of these has been taken up in earlier more buoyant conditions. Specifically, Rock Channel has land assembly and business relocation issues; the Lower School site is subject to applications for retail development; Rye Harbour has flood risk issues.
- 10.6 For Battle, the Town Study concludes that the option of a more dispersed distribution of new development around the town may be preferable to a continuing focus on the south east of the town. This is partly in response to town centre congestion issues noted in the previous section. It should not impact on the scale of development, but a greater number of sites may increase uncertainty on the rate of delivery.
- 10.7 In addition, background work for the fringes of Hastings has shown that the two specific locations identified in the 'Consultation on Strategy Directions' document are no longer represent sustainable development options. Breadsell Farm is ruled out primarily in response to the fact that a larger adjoining site in Hastings Borough, which would have facilitated local jobs and services, is no longer proposed. Housing on land at Wilting Farm is ruled out due to the lack of accessible services as well as doubts over the implementation of a new railway station.

- 10.8 With the close presence of the High Weald AONB around Hastings, and the important setting it provides for the town, as well as other constraints, the opportunities for replacing these potential development areas are very limited.
- 10.9 The SHLAA largely confirmed the earlier Rural Settlements Study in that, overall, villages are expected to have sufficient capacity to meet the original requirement. Supply is dispersed over many sites, and village sites are generally more attractive to developers.

Regard to “Windfall” Sites

- 10.10 Windfall sites (i.e. those that are not specifically identified in the extant ‘development plan’) have made a major contribution to house building in Rother district in the past, in both relative and absolute terms.

- 10.11 However, PPS3 states that:

“At the local level, Local Planning Authorities should set out in Local Development Documents their policies and strategies for delivering the level of housing provision, including identifying broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption,²⁹ taking account of the level of housing provision set out in the Regional Spatial Strategy. (para 53)”

- 10.12 Paragraph 54 adds: ‘LPAs should identify sufficient specific sites to deliver housing in the first five years.’

- 10.13 Paragraph 55 further states:

‘Local Planning Authorities should also:

- Identify a further supply of specific, developable sites for years 6-10 and, where possible, for years 11-15. Where it is not possible to identify specific sites for years 11-15, broad locations for future growth should be indicated.*
- Linked to above, identify those strategic sites which are critical to the delivery of the housing strategy over the plan period.*
- Show broad locations on a key diagram and locations of specific sites on a proposals map.*
- Illustrate the expected rate of housing delivery through a housing trajectory for the plan period.’*

10.14 Paragraph 59 is specific to the regard LPAs can have to windfall sites:

“Allowances for windfalls³¹ should not be included in the first 10 years of land supply unless Local Planning Authorities can provide robust evidence of genuine local circumstances that prevent specific sites being identified. In these circumstances, an allowance should be included but should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends.”

10.15 PPS3 also highlights the need for flexibility reflecting the principles of a 'plan, monitor, manage' approach. (para 52)

10.16 It follows that regular monitoring of 'windfall' completions will be necessary to help inform appropriate levels of land release, in accordance with the principles of 'Plan, Monitor, Manage'.

10.17 As can be seen from the table below, Rother has a good track record of windfall housing developments on both large and small (less than 6 dwellings) sites.

	00 /01	01 /02	02 /03	03 /04	04 /05	05 /06	06 /07	07 /08	08 /09	09 /10	Total	Annual average	%
Small	83	71	82	90	92	92	12	11	96	51	898	89.8	36.9
Large	90	11	12	11	19	15	29	30	10	44	1537	153.7	63.1
Total	17	18	20	20	28	24	41	42	20	95	2435	243.5	100.0

10.18 These sites are essentially brownfield windfall sites within existing 'development boundaries'. The 'Consultation on Strategy Directions' proposed that 'development boundaries' be maintained, and this received broad support. Hence, they will continue to exist.

10.19 While over 60% of the total number of dwellings on windfall sites have been on large sites in the past, it is accepted that their incidence can be expected to reduce given the work through the SHLAA in particular in identifying potential sites for allocation.

10.20 Even so, there will still be instances of sites coming forward in line with policies, such as through urban intensification. However, there is no clear basis for estimating such occurrences, so it is accepted that allowance can only be made for them when planning permission has been granted.

- 10.21 However, as allocations are not normally made for sites of less than 6 dwellings, there will inevitably be a continuing supply of small-site windfalls. Given the contribution these are likely to make to overall supply, especially in smaller settlements, it is proposed that the potential provided by PPS3 to have regard to windfalls in the period beyond the first 10 years of the plan should be applied.
- 10.22 The longer term rate of windfall development is not expected to continue at the same rate as has been experienced over the previous years. This is because there is now a less buoyant housing market, and the removal of garden land from the definition of 'previously developed land' means that this significant source of windfall sites will likely be reduced. Also, the overall stock of buildings, including former agricultural buildings, suitable for residential conversion is reducing.
- 10.23 It is difficult to estimate the combined effect of these factors, but a halving of supply would be a generous reduction in their occurrence. On the basis of a 50% fall in past (2000-2010) small sites windfalls, a total windfall allowance would amount to 225 dwellings for the period 2023-2028 (i.e. 45 dwellings pa).
- 10.24 In practice, small site windfalls will come forward in the first 10 years as well. This will be monitored and may impact on the scale and timing of allocations. However, as it will still be necessary to allocate sufficient land to achieve 10 years supply, windfall sites coming forward in this period will also provide a contingency for certain sites not being developed.

11. Conclusions

- 11.1 The preceding sections highlight the range of factors to be balanced in deciding the most appropriate scale of development, and housing specifically.
- 11.2 In determining the most appropriate balance between the various 'drivers' for housing growth and environmental and infrastructure constraints, alignment with the vision for an area is regarded as critical.
- 11.3 While the vision that has been developed for Rother is essentially local, it also recognises that economic and housing market areas are sub-regional in nature, as are the main transport linkages. The findings in relation to this broader context are therefore considered below.

Strategic approach to housing growth

- 11.4 Demographic forecasts show a need for additional housing in the south-east of England, which is manifest in a continuing demand for further housing in East Sussex, albeit the pressure exerted on the housing market is less than that for areas closer to or better linked to London.
- 11.5 The preceding review of migration scenarios also demonstrates that in-movement of people can be positive in helping to sustain local services and to support economic regeneration. It can also assist in maintaining a well-balanced population, which is particularly significant in Bexhill and many other coastal communities where the population is already skewed towards older age groups.
- 11.6 Given that the eastern part of East Sussex has one of the weakest economies in the South East, with parts of Hastings, and now of Bexhill, having some of the highest levels of deprivation, it is especially important to both encourage economically active households, including families, into the area, as well as to make the area more attractive to young adults, and so stem the net outflow of this age group.
- 11.7 Economic forecasts do not suggest substantial increases in labour demand to support significant new employment opportunities. Indeed, the high reliance on service sectors, especially the public services, as well as for access to major markets, may make the area more vulnerable to a slow recovery. Set against this though, there are on-going initiatives to stimulate the economy of the Hastings and Bexhill area which are bearing fruit, while the rural parts have seen a growth in small firms and in home-working. Indeed, this is being made easier by changing working patterns and IT.
- 11.8 Therefore, with the right linkages between economic and housing policies, it is considered that managed in-migration (as far as this is possible) within environmental and infrastructure capacities would be positive.

- 11.9 There are strategic environmental considerations that have a major bearing on the area's ability to accommodate development sustainably. International nature conservation areas straddle the far south-eastern and south-western corners of the District. There is an EU requirement not to allow development that harms those interests. This can impact on development close to as well as within those areas, as consequential increases in recreational activity, traffic or pollution from development could harm such interests. Rye and Camber are especially affected.
- 11.10 A large scale of development would also be incompatible with the High Weald AONB, which is recognised as a landscape of national value, akin to a National Park, where priority should be given to the conservation of its natural beauty. Moreover, the dispersed pattern of settlement makes it especially sensitive to substantial amounts of new building.
- 11.11 These strategic considerations formed the basis of the scales of development contained in the South East Plan, namely for an average of 280 dwellings a year, with the majority (200 dwellings a year), within the coastal area, essentially outside the AONB. As the largest town within the Rother part of the Sussex Coast sub-region, Bexhill was the clear focus of this growth.

Spatial planning areas

- 11.12 A strong theme that has emerged through consultation is a community-oriented perspective in relation to development and change. This sits squarely with the Government's emphasis on "localism".
- 11.13 In particular, the respective Town Studies for Bexhill, Battle and Rye have highlighted that they all have particular and distinct local issues, with all have service and employment linkages with Hastings (although only Bexhill and Rye are within the 'Sussex Coast' sub-region).
- 11.14 Similarly, the issues affecting villages in the Sussex Coast' sub-region are very akin to those facing other villages in the 'rest of Rother' area. Parish Councils in particular have supported the idea of an overall "rural areas strategy" for all parishes.
- 11.15 Therefore, it is proposed that the spatial policies of the Core Strategy would be more appropriately formulated, and presented, for each town and the rural areas, rather than by sub-region. Notwithstanding this, regard will be paid to the relevant sub-regional policies of the South East Plan in developing local policies.

Scale of housing growth

- 11.16 The South East Plan process concluded that a higher level of development in Rother district would not be sustainable. This was supported by the Initial Sustainability Appraisal Report.
- 11.17 The further appraisals set out in the preceding sections in relation to the sustainability and deliverability of both residential and business development, in Bexhill, Rye and the Hastings fringes in particular, leads to the view that the scales of growth should be reduced somewhat for those areas
- 11.18 The overall impact of the propose revised growth levels (as set out in each of the respective Background Papers) would mean an overall scale of housing growth of 3,700 – 4,100 additional dwellings (net) over the period 2011-2028. This is equivalent to an average of 210-241 dwellings per annum compared to 280 dwellings per annum in the South East Plan.
- 11.19 Taking account of completions 2006-2011, this equates to 5,057 – 5,457 dwellings over the period 2006 - 2028, or between 90 - 97% of the South East Plan target, albeit over 22 rather than 20 years period. For the period 2006 - 2026, the mid-point of the proposed range represents 86% of that of the annualised South East Plan target. This option is supported by the final Sustainability Appraisal.

Management of housing growth

- 11.20 Formulation of the Core Strategy has been consistently against the backcloth of some uncertainty regarding the construction of the Bexhill to Hastings Link Road. This is critical infrastructure to deliver the strategy as well as development levels planned for Bexhill, and adjoining Hastings.
- 11.21 East Sussex County Council, as scheme promoter, advises that it is confident that the road will be built. Therefore, and given its progress through statutory processes to date, its completion is still assumed within the strategy.
- 11.22 By implication, the level of development at Bexhill is notably higher than it would otherwise be without the Link Road. It is noted that this higher rate of growth, as much in employment terms as housing, is regarded as most consistent with the overall strategy for the town.
- 11.23 At the same time, consideration is given to the implications of further delay, or cancellation of the Link Road. This essentially relates to the limitation it would have on the release of major sites, with the actual quantum of development allowable requiring more detailed transport modelling.

- 11.24 In effect, it is proposed to put forward a 'stage 1 strategy based on transport capacity without the Road, and a 'stage 2 strategy', which will include strategic growth, for when it is built. Further consideration is given to other implications in the Bexhill Town Study.
- 11.25 A key issue is what approach should be taken in the event of reduced housing development at Bexhill due to inadequate transport capacity. The clear conclusion of the Sustainability Appraisal is that it would be unsustainable to increase requirements elsewhere in the district, and run counter to the conclusions of the respective Town Studies and Rural Areas Study on what constitutes sustainable levels of growth.
- 11.26 While providing for only a limited amount of development on windfall sites in line withPPS3 may result in a higher level of development than planned, it is concluded that any emerging undue increase in development levels can be mitigated by including a policy in the Core Strategy to allow scope for phasing the release of sites.

Appendix 1 South East Plan Preparation Process

Date	Event
Dec 2003	Brief for Sussex Coast Sub-Regional Study issued.
April 2004	<p>Sussex Coast Sub-Regional Study submitted to SEERA, which explored the impact of:</p> <ul style="list-style-type: none"> • continuing the RPG9 rate of housing development; and • the RPG9 rate + 30%. <p>It concluded that:</p> <ul style="list-style-type: none"> • priority should be given to economic regeneration; • even RPG9 rates of housing would be difficult to achieve in a sustainable way; and • the capacity of some towns to expand outwardly was being reached.
Aug 2004	SEERA Brief issued for the preparation of a Strategy for the Sussex Coast Sub-Region.
Oct 2004	<p>Sub-Regional Strategy submitted to SEERA, including:</p> <ul style="list-style-type: none"> • consideration, via sustainability appraisal, of sub-regional housing provision options at RPG9 level, and + and - 20%; • proposing, subject to more detailed testing, a housing level approaching RPG9 level of 3,000 dwellings per annum; and • indicating a broad distribution of housing in 3 sectors of the sub-region.
Jan 2005	Briefs for further work on district housing distributions for Sussex Coast Sub-Region and Rest of East Sussex issued by SEERA.
Jan - Apr 2005	<p>Consultation on Draft SE Plan with regional housing provision options (in dwellings per annum) of:</p> <ul style="list-style-type: none"> • 25,500 (build rate over previous 5 years) • 28,000 (RPG9 build rate) • 32,000 (1990s in-migration rates continuing) <p>distributed as follows.</p>

Date Event

Net dwellings per annum	Existing Policy			Sharper Focus		
SE Region	25,500	28,000	32,000	25,500	28,000	32,000
Sussex Coast	2,700	3,000	3,600	2,300	2,600	3,100
Gatwick Area	900	1,100	1,300	1,300	1,500	1,800
Rest of E Sussex	300	400	500	400	400	500

6 June 2005 Further joint LA Advice to SEERA on:

- affordable housing;
- employment issues;
- response to ERM SA of Sub-Regional Strategy; and
- response to consultation on draft SE Plan.

13 July 2005 SEERA Plenary approves Part 1 of SE Plan including regional dwelling provision of 28,900 per annum and a distribution as follows:

Sub Region	E Sussex*	W Sussex	Total
Sussex Coast	1,600	1,100	2,700
Gatwick Area	-	(1,400)	(1,600)
Rest of county areas	300	(400)	(3,710)
TOTAL	1,900	(2,900)	(28,900)**

*inc. Brighton & Hove

**Figs in brackets not directly relevant to East Sussex and may not sum because of other components not shown

4/29 July 2005 Meetings on District housing distribution with

- LDC
- EBC/WDC
- HBC/RDC

Date	Event
Sept - Oct 2005	New Homes for East Sussex published for consultation on proposed district housing provisions
9 Dec 2005	Submission to SEERA of Final Revised Strategy for Sussex Coast including district housing provisions
March 2006	SE Plan submitted to Government incorporating our advice on housing provisions for East Sussex.