

Housing Land Supply incorporating Housing Trajectory

April 2021 position statement

Rother District Council Town Hall London Road Bexhill-on-Sea East Sussex TN39 3JX Published November 2021

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1. Introduction

1.1. This report presents information about housing completions, commitments and requirements as at 1 April 2021. As such, it meets the National Planning Policy Framework¹ (NPPF) requirement to annually monitor housing delivery and it provides guidance to Planning Committee, Planning Officers, developers and interested parties on the current supply of deliverable sites.

Summary

- 1.2. As the adopted Local Plan Core Strategy was adopted in September 2014, it is now more than five years old² and in accordance with the NPPF the Council measures its five-year housing land supply position against its minimum local housing need (LHN) figure, defined using the standard method calculation, until such time as a new target is established through the Plan-Making process.
- 1.3. As at 1 April 2021, the LHN figure for Rother is 740 dwellings per annum. This is in sharp contrast to the annualised Core Strategy target of 335 dwellings per annum and considerably higher than the Core Strategy residual requirement figure of 528 dwellings per annum for this point in the Plan period.
- 1.4. Due to the considerable uplift in the housing figure, the Council is only able to identify <u>2.89 years of housing supply.</u> It is concluded that there is currently an insufficient supply of deliverable housing sites to meet the five-year housing land supply requirement in accordance with paragraph 74, or a three-year housing land supply in accordance with paragraph 14c of the NPPF.
- 1.5. The general presumption in favour of sustainable development is currently a critical reference point when determining planning applications across the district. Significant weight should generally be given to the benefits that additional housing supply would bring, although this will depend to some extent on local circumstances, including the impact on the High Weald AONB.

¹ <u>https://www.gov.uk/government/publications/national-planning-policy-framework--2</u>

² Adopted 29 September 2014

2. Housing Completions

2.1. Between 1 April 2020 and 31 March 2021 there were 175 net additional dwellings built within the district. Figure 1 shows that there has been a total of 2,001 dwellings completed since 2011³, averaging 200 completions a year.

| Year | Annual housing completions |
|----------------|----------------------------|
| 2011/12 | 177 |
| 2012/13 | 98 |
| 2013/14 | 157 |
| 2014/15 | 177 |
| 2015/16 | 246 |
| 2016/17 | 283 |
| 2017/18 | 186 |
| 2018/19 | 255 |
| 2019/20 | 247 |
| 2020/21 | 175 |
| Total | 2,001 |
| Annual average | 200 |

Figure 1: Net annual housing completions

Large site completions

2.2. There were 134 dwellings completed on large sites (sites of 6 or more net dwellings) in 2020/21. Figure 2 shows that there has been a total of 1,445 large site completions since 2011, making up approximately 72% of total completions and averaging 145 dwellings a year.

| Year | Large site completions | % of total completions on large sites |
|----------------|------------------------|---------------------------------------|
| 2011/12 | 117 | 66% |
| 2012/13 | 59 | 60% |
| 2013/14 | 129 | 82% |
| 2014/15 | 119 | 67% |
| 2015/16 | 176 | 72% |
| 2016/17 | 177 | 63% |
| 2017/18 | 144 | 77% |
| 2018/19 | 199 | 78% |
| 2019/20 | 191 | 77% |
| 2020/21 | 134 | 77% |
| Total | 1,445 | 72% |
| Annual average | 145 | 1276 |

Figure 2: Net annual housing completions on large sites

³ The start of the Local Plan Core Strategy planning period.

Large windfall site completions

2.3. The NPPF defines windfall sites as:

"Sites not specifically identified in the development plan."

For Rother, this means sites that have not been identified in the Rother District Local Plan (RDLP) 2006⁴, the Development and Site Allocations (DaSA) Local Plan⁵, a Neighbourhood Plan⁶ or the Strategic Housing Land Availability Assessment (SHLAA) 2013⁷.

- 2.4. The development plan in Rother only identifies large sites (sites of 6 or more net dwellings) and therefore, all small sites (sites of less than 6 net dwellings) are technically considered windfall sites.
- 2.5. There were 60 dwellings completed on large windfall sites in 2020/21. Figure 4 shows that there has been a total of 404 large windfall site completions since 2011, making up approximately 28% of large site completions and 20% of total completions, averaging 40 dwellings a year.

| Year | Large windfall site completions | % of large site completions on large windfall sites ⁸ | % of total completions on large windfall sites ⁹ |
|----------------|---------------------------------|--|---|
| 2011/12 | 30 | 26% | 17% |
| 2012/13 | 21 | 36% | 21% |
| 2013/14 | 46 | 36% | 29% |
| 2014/15 | 10 | 8% | 6% |
| 2015/16 | 80 | 45% | 33% |
| 2016/17 | 32 | 18% | 11% |
| 2017/18 | 37 | 26% | 20% |
| 2018/19 | 34 | 17% | 13% |
| 2019/20 | 54 | 28% | 22% |
| 2020/21 | 60 | 45% | 34% |
| Total | 404 | 28% | 200/ |
| Annual average | 40 | | 20% |

Figure 4: Net annual housing completions on large windfall sites

⁴ <u>http://www.rother.gov.uk/rotherdistrictlocalplan2006</u>

⁵ <u>http://www.rother.gov.uk/dasa</u>

⁶ <u>http://www.rother.gov.uk/neighbourhoodplans</u>

⁷ <u>https://www.rother.gov.uk/wp-</u> content/uploads/2020/01/Strategic_Housing_Land_Availability_Assessment_June_2013_Tables_and __Maps_Final.pdf

⁸ This column shows the percentage of dwellings completed on large sites (excluding small sites) that were large site windfalls.

⁹ This column shows the percentage of dwellings completed on all sites (large and small sites) that were large site windfalls.

Small site completions

2.6. There were 41 dwellings completed on small sites (sites of less than 6 net dwellings) in 2020/21. Figure 3 shows that there has been a total of 556 small site completions since 2011, making up approximately 28% of total completions and averaging 56 dwellings a year.

| Year | Small site completions | % of total completions on small sites |
|----------------|------------------------|---------------------------------------|
| 2011/12 | 60 | 34% |
| 2012/13 | 39 | 40% |
| 2013/14 | 28 | 18% |
| 2014/15 | 58 | 33% |
| 2015/16 | 70 | 28% |
| 2016/17 | 106 | 37% |
| 2017/18 | 42 | 23% |
| 2018/19 | 56 | 22% |
| 2019/20 | 56 | 23% |
| 2020/21 | 41 | 23% |
| Total | 556 | 200/ |
| Annual average | 56 | 28% |

| Figure 3: Net annual housing completions on small sites |
|---|
|---|

Brownfield land completions

2.7. The NPPF glossary defines brownfield land or 'previously developed land' as:

"Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape."

2.8. There were 48 dwellings completed on brownfield land in 2020/21. Figure 5 shows that there has been a total of 1,064 brownfield land completions since 2011, making up approximately 53% of total completions and averaging 106 dwellings per annum.

| Year | Brownfield land completions | Greenfield land completions | % of total completions on brownfield land | |
|----------------|-----------------------------|--------------------------------|--|--|
| 2011/12 | 70 | 107 | 40% | |
| 2012/13 | 61 | 37 | 62% | |
| 2013/14 | 123 | 34 | 78% | |
| 2014/15 | 152 | 25 | 86% | |
| 2015/16 | 172 | 74 | 70% | |
| 2016/17 | 132 | 151 | 47% | |
| 2017/18 | 66 | 120 | 35% | |
| 2018/19 | 133 | 122 | 52% | |
| 2019/20 | 107 | 140 | 43% | |
| 2020/21 | 48 | 127 | 27% | |
| Total | 1,064 | 937 | F 20/ | |
| Annual average | 106 | 94 | 53% | |

Figure 5: Net annual housing completions on brownfield land

Affordable housing completions

2.9. There were 67 gross affordable housing completions in 2020/21. Figure 6 shows that there has been a total of 748 gross affordable housing completions since 2011, making up approximately 32% of gross total completions and averaging 75 gross dwellings per annum.

| Year | Gross affordable completions | Gross total completions | % of total completions as affordable |
|----------------|------------------------------|----------------------------|---|
| 2011/12 | 70 | 203 | 34% |
| 2012/13 | 13 | 123 | 11% |
| 2013/14 | 58 | 168 | 35% |
| 2014/15 | 129 | 205 | 63% |
| 2015/16 | 58 | 291 | 20% |
| 2016/17 | 104 | 315 | 33% |
| 2017/18 | 66 | 249 | 27% |
| 2018/19 | 80 | 307 | 26% |
| 2019/20 | 103 | 277 | 37% |
| 2020/21 | 67 | 175 | 38% |
| Total | 748 | 2,313 | 200/ |
| Annual average | 75 | 231 | 32% |

Figure 6: Gross annual affordable housing completions

2.10. In terms of the split between affordable rented accommodation and shared ownership/intermediate housing, Figure 7 shows that there have been 32 units of rented accommodation and 35 units of shared ownership housing completed in 2020/21.

| Year | Affordable rented completions | Intermediate/ shared completions |
|----------------|----------------------------------|-------------------------------------|
| 2011/12 | 54 | 16 |
| 2012/13 | 0 | 13 |
| 2013/14 | 46 | 12 |
| 2014/15 | 125 | 4 |
| 2015/16 | 16 | 42 |
| 2016/17 | 84 | 20 |
| 2017/18 | 44 | 22 |
| 2018/19 | 57 | 23 |
| 2019/20 | 58 | 45 |
| 2020/21 | 32 | 35 |
| Total | 516 | 232 |
| Annual average | 52 | 23 |

Figure 7: Tenure breakdown of gross annual affordable housing completions

3. Housing commitments

3.1. As shown in Figure 8, there are commitments for a total of 4,147 net additional dwellings on identified sites within Rother.

Figure 8: Total commitments at 1 April 2020

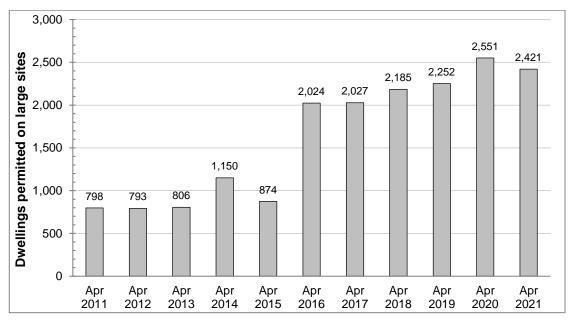
| Commitments | No. of dwellings |
|--|------------------|
| Large site permissions ¹⁰ (inc. S106) | 2,421 |
| Small site permissions | 274 |
| DaSA Local Plan allocations | 1,215 |
| Neighbourhood Plan allocations | 237 |
| Total commitments | 4,147 |

Sites with planning permission

- 3.2. As at 1 April 2021, there are 2,421 outstanding dwellings on large sites with planning permission (including sites that have a resolution to grant planning permission subject to the completion of an S106 agreement).
- 3.3. Figure 9 shows that there is a noticeable jump in outstanding dwellings on large sites in April 2016. This is due to the outline planning permission at Worsham Farm in North East Bexhill being granted for some 1,050 dwellings.

¹⁰ Including allocated sites that have been granted planning permission or that have delegated approval subject to completion of a Section 106 agreement.

Figure 9: Number of outstanding dwellings on large sites



- 3.4. Since then, however, there has only been a slight upward trend in the number of permitted dwellings on large sites within the District with a slight drop in the current year.
- 3.5. Figure 10 provides a breakdown between the types of large site permissions.

| Type of planning permission | No. of dwellings | % of large permissions |
|---|---------------------|---------------------------|
| Detailed permissions (Full + Reserved Matters) | 1,233 | 50.9% |
| Outline permissions | 942 | 38.9% |
| Resolutions to grant permission subject to S106 | 246 | 10.2% |
| Permitted Developments | 0 | 0.0% |
| Total | 2,421 | 100% |

Figure 10: Number of dwellings permitted on large sites, by type of permission

- 3.6. In addition to the large site permissions, there are a further 274 net additional dwellings on small sites with planning permission, bringing the total number of outstanding dwellings on sites with planning permission (including sites that have a resolution to grant planning permission subject to S106) to 2,695.
- 3.7. See Appendices 1 and 2 for a complete list of large site permissions.

Site allocations

- 3.8. Housing site allocations within Local Plans and made Neighbourhood Plans account for a further 1,452 housing commitments, as at 1 April 2021.
- 3.9. Figure 11 shows the number of dwellings on housing sites which have been allocated but have not yet received planning permission.

| Allocations | No. of dwellings |
|--|------------------|
| DaSA Local Plan allocations | 1,215 |
| Crowhurst Neighbourhood Plan allocations | 30 |
| Rye Neighbourhood Plan allocations | 99 |
| Salehurst & Robertsbridge Neighbourhood Plan allocations | 46 |
| Sedlescombe Neighbourhood Plan allocations | 37 |
| Ticehurst Neighbourhood Plan allocations | 25 |
| Total allocations | 1,452 |

Figure 11: Number of dwellings allocated within Local and Neighbourhood Plans

- 3.10. Figure 18 on page 114 of the DaSA Local Plan shows that there is a total of 1,562 dwellings on land allocated for housing sites. It should be noted however, that several of the DaSA allocations already had planning permission (or resolutions to grant planning permission subject to a S106 legal agreement) but were allocated because either a formal planning permission was not actually in place at the 1 April 2018 base date of the DaSA Local Plan or there were doubts about its implementation. Furthermore, several other of the DaSA allocations have been granted planning permission since the 1 April 2018 base date of the DaSA Local Plan.
- 3.11. DaSA allocations that have planning permissions (or resolutions to grant planning permission subject to completion of Section 106 agreement) are shown in Figure 12.
- 3.12. There are 11 designated Neighbourhood Areas within the district. They are the parishes of Battle, Burwash, Crowhurst, Etchingham, Fairlight¹¹, Hurst Green, Peasmarsh, Rye, Salehurst and Robertsbridge, Sedlescombe and Ticehurst.
- 3.13. As at 1 April 2021 the Crowhurst, Rye, Salehurst and Robertsbridge, Sedlescombe and Ticehurst Neighbourhood Plans have all been 'made'.

¹¹ Although a designated Neighbourhood Area, Fairlight is no longer preparing a Neighbourhood Plan.

| Policy | Site | Permission ref. | Permission type | Dwellings allocated | Dwellings permitted |
|--------------------|---|-----------------|----------------------------------|---------------------|---------------------|
| BEX2 | Land at Preston Hall Farm, Sidley, Bexhill | RR/2017/2441/P | Full | 139 | 139 |
| BEX4 | Land at Former High School Site and Drill Hall, Down Road, Bexhill | RR/2019/430/P | Resolution subject to S106 | 35 - 54 | 52 |
| BEX7 | Land at Moleynes Mead, Fryatts Way, Bexhill | RR/2017/2452/P | Resolution subject to S106 | 24 | 24 |
| BEX8 | Land south of Terminus Road, Bexhill | RR/2018/2453/P | Outline | 10 | 10 |
| HAS2 | Land at Michael Tyler Furniture, Woodlands Way, Hastings | RR/2015/2264/P | Resolution subject to S106 | 40 | 40 |
| BRO2 ¹² | Land south of the Rainbow Trout Pub, Broad Oak | RR/2018/1813/P | Resolution subject to S106 | 20 | 8 |
| NOR2 | Land south of The Paddock/Goddens Gill, Northiam | RR/2019/2738/P | Resolution subject to S106 | 52 | 34 |
| WES1 | Land at Westfield Down, Westfield | RR/2017/1293/P | Reserved Matters | 39 | 39 |
| | | | Total | 359 - 378 | 346 |

Figure 12: DaSA allocations with planning permissions/resolutions as at 1 April 2020

- 3.14. There is a total of 237 outstanding dwellings allocated in the made Neighbourhood Plans, as at 1 April 2021.
- 3.15. The parish of Peasmarsh was designated as a Neighbourhood Area in March 2021 and the Plan is in an early stage of preparation. The parishes of Etchingham and Hurst Green are working towards the Regulation 14 (proposed submission) stage, while Battle¹³ and Burwash are both are Examination.
- 3.16. It should be noted that the Salehurst and Robertsbridge Neighbourhood Plan (SRNP) originally allocated sites to provide between 156 and 180 dwellings. Since then however, the sites at Hodson's Mill and Grove Farm have been granted planning permission (or a resolution to grant planning permission subject to S106), reducing the figure to between 41 and 50. A mid-point of 46 dwellings has then been assumed for calculations within this report.

¹² Only part of the site allocation at The Rainbow Trout, Broad Oak has so far received planning permission for 8 dwellings.

¹³ Note that at the time of publishing this position statement, the Battle CP Neighbourhood Plan has been 'made'.

- 3.17. Similarly, the Sedlescombe Neighbourhood Plan (SNP) has allocated sites for between 34 and 39 dwellings, therefore a mid-point of 37 dwellings has been assumed.
- 3.18. The remaining part of the saved 2006 Local Plan allocation BT3: Land North of North Trade Road, Battle has been excluded from the commitments above due to concerns over its deliverability. Furthermore, it is not being re-allocated in the Battle CP Neighbourhood Plan.

4. Housing land supply

4.1. Paragraph 74 of the NPPF states that:

"Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old."

- 4.2. This is what's known as the five-year housing land supply position and there are several steps involved in calculating it. These are:
 - Determining the annualised housing figure
 - Defining the buffer
 - Identifying the supply of deliverable sites
 - Calculating the five-year housing land supply position

Determining the annualised housing figure

- 4.3. The first step in the process is to determine the number of dwellings that should be delivered over the next five years.
- 4.4. In previous Housing Land Supply position statements, this was calculated using the Core Strategy target of 5,700 net additional dwellings to be provided within the District, between 2011 and 2028.
- 4.5. However, the Core Strategy was adopted 29 September 2014 and is therefore more than five years old, as at 1 April 2021. This means that currently, the standard method for assessing Local Housing Need¹⁴ (LHN) identifies a minimum annual housing need figure for the District. It does not produce a housing requirement figure as this will be established by the plan-making process and independently tested through Examination. However, this standard method calculation is the starting point for the plan-making process.
- 4.6. The PPG states that:

"The standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply."

¹⁴ <u>https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments</u>

- 4.7. A key component of the LHN calculation is the Government's official household projections that are published for all local authorities every two years by the Office for National Statistics (ONS).
- 4.8. In October 2018, the Government commenced a 'Technical consultation on updates to national planning policy and guidance'¹⁵ which included a 'short term' proposal which specified that the 2014-based household projections should provide the demographic baseline for the assessment of local housing need. In February 2019 the Government confirmed¹⁶ that the 2014-based household projections should be used.
- 4.9. Therefore, using the 2014-based projections, the LHN figure for Rother, as at 1 April 2021, is <u>740 dwellings per annum</u>. See Appendix 7 for the calculation.
- 4.10. As shown in Figure 13, an annualised housing figure of 740 dwellings per annum is a significant increase over the annualised Core Strategy residual requirement for previous years.

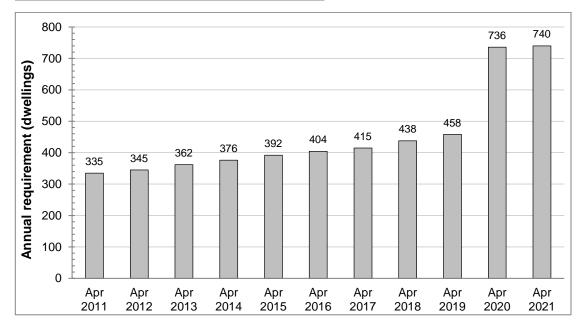


Figure 13: Annualised housing figure (dwellings)

¹⁵ <u>https://www.gov.uk/government/consultations/changes-to-planning-policy-and-guidance-including-the-standard-method-for-assessing-local-housing-need</u>

¹⁶ See paragraph 005 of Planning Practice Guidance on 'Housing and economic needs assessment' <u>https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments</u>

Defining the buffer

4.11. Paragraph 74 of the NPPF also states that:

"The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

- a) 5% to ensure choice and competition in the market for land; or
- b) 10% where the local planning authority wishes to demonstrate a five-year supply of deliverable sites through an annual position statement or recently adopted plan¹⁷, to account for any fluctuations in the market during that year; or
- c) 20% where there has been significant under-delivery of housing over the previous three years, to improve the prospect of achieving the planned supply."
- 4.12. From November 2018, '*significant under-delivery*' is defined as where the Housing Delivery Test indicates that delivery was below 85% of the dwellings required.
- 4.13. The Housing Delivery Test (HDT) is an annual measurement of housing delivery in the area of relevant plan-making authorities, brought in by the Ministry of Housing, Communities & Local Government (MHCLG). It is a percentage measurement of the number of net homes delivered against the number of homes required, as set out in the relevant strategic policies for the area, over a rolling three-year period.
- 4.14. The planning policy consequences of not meeting the HDT are set out in footnote 8 and paragraphs 74 and 76 of the NPPF.
 - a) Where the HDT indicates that delivery has fallen below 95% of the local planning authority's housing requirement over the previous three years, the authority should prepare an action plan in line with national planning guidance, to assess the causes of under-delivery and identify actions to increase delivery in future years.
 - b) Where the HDT indicates that delivery has fallen below 85%, this will amount to 'significant under-delivery of housing' and the five-year supply of specific deliverable sites should, in addition, include a buffer of 20% to improve the prospect of achieving the planned supply.

¹⁷ A plan adopted between 1 May and 31 October will be considered 'recently adopted' until 31 October of the following year; and a plan adopted between 1 November and 30 April will be considered recently adopted until 31 October in the same year.

- c) Where the HDT indicates that delivery has fallen below 75%, the presumption in favour of sustainable development will apply, as per paragraph 11 of the NPPF.
- 4.15. The 2020 HDT results¹⁸ were published on 19 January 2021. This shows that the 2020 measurement for Rother was 65%, which is below the 85% threshold, and therefore <u>a 20% buffer should be applied to the five-year</u> <u>housing land supply calculations</u>.
- 4.16. The requirement to include a 20% buffer in the housing land supply calculations compounds the existing problem, making it increasingly more difficult for the Council to achieve a positive housing land supply position.
- 4.17. Additionally, as the measurement is below 75%, the Council is required to produce an updated Housing Delivery Test Action Plan which will be published on the Monitoring page¹⁹ of the Council's website, as well as apply the NPPFs presumption in favour of sustainable development when determining planning applications.

Identifying the supply of deliverable housing sites

4.18. The NPPF glossary defines 'deliverable' housing sites as follows:

"To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).
- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years."

¹⁸ <u>https://www.gov.uk/government/publications/housing-delivery-test-2018-measurement</u>

¹⁹ <u>https://www.rother.gov.uk/planning-and-building-control/planning-policy/monitoring/</u>

- 4.19. Not all housing commitments identified in Section 3 can be regarded as available now and with a realistic prospect of completion in the next five years. This may particularly apply to allocations which still need to obtain planning permissions and, in some cases, be secured by developers.
- 4.20. The timing of house building for large site permissions and allocations has been assessed, based on information received directly from developers, agents and landowners. Where developer feedback is not available this information is taken from Development Management officers. Statements of Common Ground have also informed the build-out rate of some strategic sites. See Appendices 1 to 4 for the phasing of large site permissions and allocations.
- 4.21. The phasing of small site permissions has not been assessed individually and has instead been distributed evenly over the five-year period 1 April 2021 to 31 March 2026.
- 4.22. Figure 15 identifies the supply of deliverable housing as at 1 April 2021.

| Source of supply | No. of dwellings |
|--|------------------|
| Large site permissions ²⁰ (inc. S106) | 1,964 |
| Small site permissions | 274 |
| DaSA Local Plan allocations | 276 |
| Neighbourhood Plan allocations | 55 |
| Total | 2,569 |

Figure 15: Supply of deliverable housing sites

- 4.23. Large site permissions make up most of the deliverable housing sites, accounting for 1,964 (some 76%) of the total. It should be noted that a third (35%) of those large site permissions identified as being deliverable are on the Worsham Farm site in North East Bexhill.
- 4.24. It is interesting to note that approximately 81% of all large site permissions have been identified as being deliverable.
- 4.25. Small site permissions total 274, as at 1 April 2021. It is noted that when distributed evenly over the five years, the resultant 55 dwellings per year is slightly lower than the average number of small site completions per year since 2011 (56 dwellings), as shown in Figure 3.

²⁰ Including allocated sites that have been granted planning permission or that have delegated approval subject to completion of a Section 106 agreement.

4.26. Several DaSA Local Plan and Neighbourhood Plan allocations have also been assessed as being capable of delivering housing within the next five years, contributing a further 276 dwellings and 55 dwellings, respectively.

Calculating the five-year housing land supply position

4.27. The supply of sites identified as being deliverable in Figure 14 is compared to the annual LHN figure identified at paragraph 4.9 to produce the five-year housing land supply figure, as shown in Figure 16.

| | Calculation of the five-year housing land supply position | | | | | | | | | | |
|---|---|-----------|-------|--|--|--|--|--|--|--|--|
| А | Annual Local Housing Need | Para 4.9 | 740 | | | | | | | | |
| В | Five-year housing land supply requirement | A x 5 | 3,700 | | | | | | | | |
| С | Five-year housing land supply requirement plus 20% buffer | B x 1.2 | 4,440 | | | | | | | | |
| D | Supply of deliverable housing sites | Figure 14 | 2,569 | | | | | | | | |
| Е | % supply | D/C | 57.9% | | | | | | | | |
| F | Years' supply | E x 5 | 2.89 | | | | | | | | |

- 4.28. There are 2,569 dwellings on identified sites that are considered available, suitable and achievable now, which is some 1,871 dwellings (42%) less than the 4,440 dwellings required to be deliverable within the next five years, including a 20% buffer. This equates to some 2.89 years' worth of housing land supply and is similar to last year's position.
- 4.29. It is concluded that there is currently an insufficient supply of deliverable housing sites to meet the five-year housing land supply requirement in accordance with paragraph 74, or a three-year housing land supply in accordance with paragraph 14c of the NPPF.

Implications of the lack of a five-year supply

4.30. The Council considered the implications of a lack of a five-year supply at the meeting of its Cabinet on 6 June 2016²¹. The Report indicated that the absence of a five-year supply of deliverable housing sites means that the development boundaries in the 2006 Local Plan and related restrictions on development in the countryside must be acknowledged as being 'out-of-date' (under paragraph 11 of the NPPF).

²¹ <u>http://www.rother.gov.uk/article/12003/Monday-6-June-2016</u>

- 4.31. The general presumption in favour of sustainable development becomes a critical reference point when determining planning applications. It means that significant weight should generally be given to the benefits that additional housing supply would bring, although this will depend to some extent on local circumstances, including the impact on the High Weald AONB, where relevant.
- 4.32. Therefore, the Council resolved that, pending the adoption of the DaSA Local Plan and outstanding Neighbourhood Plans, sites that accord with the Core Strategy's overall development strategy and are suitable, deliverable and otherwise contribute to sustainable development, including circumstances where they are not within a development boundary, be considered favourably.
- 4.33. The issues surrounding a lack of five-year housing land supply were considered by the Overview and Scrutiny Committee²² (OSC) and on 30 July 2018 the Council endorsed the following recommendations of the Committee to ensure a sufficient and continuous supply of housing land:
 - a) Giving priority to completing the DaSA Local Plan and the production of Neighbourhood Plans.
 - b) An early review of the Local Plan (Core Strategy) is prioritised.
 - c) Consideration is given to allowing exception site planning policy to allow for an element of market housing to cross subsidise where viability is an issue.
 - d) Identification of more "small site" development opportunities, including for custom and self-build housing, possibly working with smaller developers within a public/private partnership.
 - e) 'Unblocking' of sites where physical infrastructure and/or ownership factors present a major constraint to development including by:
 - working to find strategic drainage, utilities and digital broadband solutions to support major developments, working with utility companies and respective developers;
 - seeking financial support from Homes England and other Central Government growth funds;
 - working proactively to bring forward development on sites where the Council has a landholding interest;

²² <u>http://www.rother.gov.uk/article/13225/Monday-30-July-2018</u>

- proactively negotiating with developers and landowners to bring forward key development sites; and
- consideration, as a last resort, of pursuing Compulsory Purchase Orders, being mindful of local sensitivities.
- f) Continuing to invest in strategically important infrastructure projects that boost the market attractiveness of places where growth is planned.
- g) Promoting higher water efficiency standards through the Local Plan as well as exploring the opportunity of introducing 'recycled water' within planning applications.
- h) Introduce and deliver a Landowners Forum, to take place once every two years.
- i) Prepare a housing delivery "Action Plan" in response to the new Housing Delivery Test.
- 4.34. The Council will seek to implement these recommendations in a timely fashion and, given the need to increase housing delivery, progressing the Local Plan Review will be prioritised with a focus on producing an updated Housing and Economic Land Availability Assessment (HELAA), including a call for sites.
- 4.35. To that end, the DaSA Local Plan was adopted in December 2019 and an updated Local Development Scheme (LDS) was published in March 2021.
- 4.36. Work is also well underway in preparation of the new Local Plan with adoption timetabled for 2023. A Call for Sites was conducted from 12 October to 7 December 2020, however site submissions are still being accepted and work on the HELAA is ongoing.
- 4.37. In October 2020 the Council's Local Housing Company (LHC), Alliance Homes (Rother) Ltd, was incorporated. This LHC will seek opportunities to acquire sites allocated for housing in the new Local Plan and potentially help to unblock stalled sites.
- 4.38. More details about the steps the Council is taking to address the under-supply of housing can be found in the Housing Delivery Test Action Plan, published on the <u>Planning Policy Monitoring</u> page of the Councils website²³.

²³ https://www.rother.gov.uk/planning-and-building-control/planning-policy/monitoring/

Implications of the lack of a three-year supply

4.39. Paragraph 14 of the NPPF states that:

"In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided all of the following apply:

a) the neighbourhood plan became part of the development plan two years or less before the date on which the decision is made;

b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement;

c) the local planning authority has at least a three-year supply of deliverable housing sites (against its five-year housing supply requirement, including the appropriate buffer as set out in paragraph 73); and

d) the local planning authority's housing delivery was at least 45% of that required over the previous three years."

- 4.40. As the Council can no longer demonstrate a three-year supply of deliverable housing, the general presumption in favour of sustainable development will now be a critical reference point when determining planning applications involving the provision of housing in Neighbourhood Areas that have a 'made' Neighbourhood Plan.
- 4.41. Essentially, now that the presumption in favour of sustainable development now applies to these 'made' Neighbourhood Plan areas, development is no longer constrained by policies in the adopted Neighbourhood Plans.

5. Housing trajectory

Supply of developable housing sites

- 5.1. Paragraph 68 b) of the NPPF states that, in addition to the supply of specific, deliverable sites identified for years one to five, a supply of specific, developable sites or broad locations for growth, for years 6 10 and, where possible, for years 11 15 of the plan should also be identified.
- 5.2. To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and are viable for development at the point envisaged.
- 5.3. Figure 18 identifies the supply of developable housing for years 6 10, as at 1 April 2021.

| Source of supply | No. of dwellings |
|------------------------------------|------------------|
| Large site permissions | 491 |
| DaSA Local Plan allocations | 989 |
| Neighbourhood Plan allocations | 182 |
| Small site windfall allowance | 225 |
| Remaining exception site allowance | 30 |
| Total | 1,917 |

Figure 18: Supply of developable housing sites

- 5.4. There are an additional 491 dwellings on large site permissions that are identified as being developable, mostly on the site at Worsham Farm in North East Bexhill.
- 5.5. DaSA allocations which have not yet been granted planning permission total
 989 and the Neighbourhood Plan allocations are expected to provide a further
 182 dwellings.
- 5.6. The phasing of development for these additional dwellings draws on information obtained to assess the supply of deliverable sites, as discussed in paragraph 4.22.

- 5.7. A small site windfall allowance of 225 dwellings has also been included. This has been calculated by applying 45 dwellings per year, over the period from 1 April 2026 to 31 March 2031, in accordance with paragraph 7.56 on page 39 of the Core Strategy. This is considered to still be appropriate, as the number of small site completions has averaged 56 per annum since 2011, as shown in Figure 3.
- 5.8. Lastly, the remaining exception site allowance of 30 dwellings has been included in accordance with paragraph 7.56 on page 39 of the Core Strategy.
- 5.9. It should be noted that work is currently underway on producing an updated windfall methodology background paper in support of the new Local Plan, which will reassess the likely contribution from windfall sites in the future, as well as the period over which any allowance should be applied.
- 5.10. As the new Local Plan is progressed, further sites or broad locations will be identified for years 6 10 and 11 15.

Housing trajectory

- 5.11. Appendices 5 and 6 show the anticipated trajectory of annual housing completions within the district.
- 5.12. It should be noted that the figures used to produce the trajectory are based on several assumptions:
 - a) The large site permissions are all built-out in accordance with information received from developers.
 - b) The DaSA allocations and Neighbourhood Plan allocations that have not yet received planning permission, all come forward and are built-out for at least the number of dwellings that have been allocated, within the Core Strategy plan period.
 - c) No allowances have been made for large site windfalls.

6. Appendices

Appendix 1: Large site permissions

| Large sites with permission | | | | | | Expected Phasing of Completions | | | | | | | | | | | Planning Notes | | |
|-----------------------------|----------------|----------------------------|---------------|---------------|---------|---------------------------------|---------|---------|---------|---------|---------|---------|---------|---------|-------|-----------|--|--|--|
| Area | Ref | Site | Settlement | Units Left | 2021/22 | 2022/23 | 2023/24 | 2024/25 | 2025/26 | 2026/27 | 2027/28 | 2028/29 | 2029/30 | 2030/31 | Total | Commenced | Notes | | |
| | RR/2015/1760/P | Worsham Farm | Bexhill | 1,027 | 67 | 90 | 110 | 155 | 170 | 165 | 130 | 90 | 50 | | 1,027 | Yes | Outline application (RR/2015/1760/P) for 1,050 units (30% AH) approved 29/03/1 21/11/17. RDLP 2006 allocation BX2. | | |
| | RR/2015/3125/P | Barnhorn Green | Bexhill | 163 | 63 | 50 | 50 | | | | | | | | 163 | Yes | Outline application (RR/2012/1978/P) for 275 units approved 26/11/14. Reserved application (RR/2015/3115/P) for 67 additional units approved 09/03/17 (amended | | |
| | RR/2017/2122/P | 58-60 Devonshire Rd | Bexhill | 6 | | 6 | | | | | | | | | 6 | Yes | Full application (RR/2017/2122/P) for 6 units approved 27/11/17. | | |
| | RR/2017/2441/P | Preston Hall Farm | Bexhill | 124 | 64 | 60 | | | | | | | | | 124 | Yes | Full application (RR/2017/2441/P) for 139 units (138 net, 30% AH) approved 02/0 | | |
| | RR/2018/2453/P | Terminus Road | Bexhill | 10 | | | | | 10 | | | | | | 10 | No | Outline application (RR/2018/2453/P) for 10 units approved 20/12/2018. | | |
| | RR/2018/273/P | St Andrew's Church | Bexhill | 11 | 11 | | | | | | | | | | 11 | Yes | Full application (RR/2018/273/P) for 11 units approved 20/04/18. | | |
| Dauhill | RR/2018/3127/P | Clavering Walk | Bexhill | 85 | | | 35 | 50 | | | | | | | 85 | No | Outline application (RR/2018/3127/P) for up to 85 units allowed at appeal 13/02/2 | | |
| Bexhill | RR/2019/2289/P | Sussex Hotel | Bexhill | 10 | 10 | | | | | | | | | | 10 | Yes | Full application (RR/2019/2289/P) for 10 units approved 18/08/20. | | |
| | RR/2019/2302/P | Indoor Market | Bexhill | 12 | | 12 | | | | | | | | | 12 | Yes | Full application (RR/2019/2302/P) for 12 units approved 17/07/20. | | |
| | RR/2020/155/P | 2a Sackville Road | Bexhill | 6 | | | | | 6 | | | | | | 6 | No | Full application (RR/2020/155/P) for 6 units approved 04/09/20. | | |
| | RR/2020/468/P | 26 & 26A Collington Avenue | Bexhill | 7 | | | | | 7 | | | | | | 7 | No | Full application (RR/2020/468/P) for 9 units (7 net) approved 12/11/20. | | |
| | RR/2020/1170/P | 40-42 Cooden Sea Road | Bexhill | 8 | | 8 | | | | | | | | | 8 | Yes | Full application (RR/2020/1170/P) for 8 units approved 08/09/20. | | |
| | RR/2020/1410/P | Ashridge Court | Bexhill | 29 | | | 10 | 19 | | | | | | | 29 | No | Outline application (RR/2016/3206/P) for 31 units allowed at appeal 23/11/2018 (18/03/21. | | |
| | RR/2020/577/P | 30 Dorset Road | Bexhill | 8 | | | | | 8 | | | | | | 8 | No | Outline application (RR/2020/577/P) for 8 units approved 20/05/2021. | | |
| | RR/2017/1136/P | Lillybank Farm | Battle | 50 | | 25 | 25 | | | | | | | | 50 | Yes | Outline application (RR/2016/725/P) for 50 units (17 units, 35% affordable) appro 29/09/17. | | |
| | RR/2017/2390/P | North Trade Road (South) | Battle | 25 | | | | 13 | 12 | | | | | | 25 | No | Outline application (RR/2017/2390/P) for 25 units (35% AH) approved 07/03/19. If | | |
| Battle | RR/2018/2666/P | North Trade Road (North) | Battle | 20 | | | 20 | | | | | | | | 20 | No | Outline application (RR/2018/2666/P) for 20 units approved 28/10/19. Reserved M | | |
| | RR/2020/2307/P | Blackfriars | Battle | 200 | | 50 | 50 | 50 | 50 | | | | | | 200 | No | Outline application (RR/2019/604/P) for 220 units approved 18/12/20. Reserved N 2006 site allocation BT2. | | |
| | RR/2020/165/P | Tollgates | Battle | 63 | | 32 | 31 | | | | | | | | 63 | Yes | Outline application (RR/2017/1259/P) for 63 units (35% affordable) approved 01/1 Reserved Matters (RR/2020/165/P) approved 21/05/20. | | |
| | RR/2017/1778/P | Thomas Peacocke | Rye | 63 | | | 33 | 30 | | | | | | | 63 | No | Full application (RR/2017/1778/P) for 65 dwellings approved 23/12/20. Rye Neigh | | |
| Due | RR/2017/2217/P | Tower Street | Rye | 6 | | | | | 6 | | | | | | 6 | No | Full application (RR/2017/2217/P) for 6 units approved 15/08/19. | | |
| Rye | RR/2018/1828/P | 48 Ferry Road | Rye | 7 | | | | | | | | | | 7 | 7 | No | Full application (RR/2018/1828/P) for 7 units approved 14/03/19. | | |
| | RR/2019/789/P | Rock Channel | Rye | 11 | | 11 | | | | | | | | | 11 | No | Full application (RR/2019/789/P) for 11 units approved 22/05/20. | | |
| | RR/2018/1813/P | Rainbow Trout | Broad Oak | 8 | 8 | | | | | | | | | | 8 | Yes | Full application (RR/2018/1813/P) for 8 units approved 04/03/20. Part of DaSA si | | |
| | RR/2017/582/P | Strand Meadow | Burwash | 30 | | | | | 15 | 15 | | | | | 30 | No | Outline application (RR/2017/582/P) for 30 units (40% AH) approved 07/03/18. R | | |
| | RR/2019/2194/P | Foundry Close | Hurst Green | 20 | | | 20 | | | | | | | | 20 | No | Full application (RR/2019/2194/P) for 20 units approved 29/10/20. | | |
| | RR/2019/243/P | Land off Main Road | lcklesham | 15 | | 15 | | | | | | | | | 15 | Yes | Full application (RRR/2019/243/P) for 15 units approved 15/09/20. Exception site | | |
| Rural Villages | RR/2017/2308/P | Darvel Down | Netherfield | 25 | | | 12 | 13 | | | | | | | 25 | No | Outline application (RR/2017/2308/P) for 25 units (40% AH) approved 22/10/18. F | | |
| | RR/2017/1629/P | Grove Farm | Robertsbridge | 30 | | | | 15 | 15 | | | | | | 30 | No | Outline application (RR/2017/1629/P) for 24 units approved 11/02/19. Further full allocation VL7. | | |
| | RR/2018/1605/P | Culverwells | Robertsbridge | 17 | | | | | 17 | | | | | | 17 | No | Outline application (RR/2013/2380/P) for 17 units approved 29/06/15. Reserved N | | |
| | RR/2019/2818/P | Hillbury Field | Ticehurst | 30 | | | 15 | 15 | | | | | | | 30 | No | Outline application (RR/2015/2953/P) for 30 units approved 13/01/17. Reserved M | | |
| | RR/2017/1293/P | Westfield Down | Westfield | 39 | 20 | 19 | | | | | | | | | 39 | No | Outline application (RR/2009/322/P) for 39 units approved 20/06/14. Reserved Ma be discharged. RDLP 2006 allocation VL11. | | |
| Hastings Fringes | RR/2018/2040/P | Bachelors Bump | Hastings | 10 | | 10 | | | | | | | | | 10 | No | Full application (RR/2018/2040/P) for 10 dwellings approved 14/10/19. | | |
| . mgco | | | Total | 2,175 | 243 | 388 | 411 | 360 | 316 | 180 | 130 | 90 | 50 | 7 | 2,175 | | | | |

| 9/03/16. Reserved Matters application (RR/2016/3245/P) for Phase 1 approved |
|--|
| erved Matters application (RR/2015/3125/P) approved 12/12/16. Further full nended by RR/2019/2242/P a further 16 units, approved 28/04/21). |
| |
| d 02/08/18. Part of RDLP 2006 allocation BX3. |
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| |
| 3/02/20. Reserved Matters application (RR/2020/2260/P) approved 18/08/21. |
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| 2018 (ref: 2563). Reserved Matters application (RR/2020/1410/P) approved |
| |
| approved 09/05/17. Reserved Matters application (RR/2017/1136/P) approved |
| 3/19. Reserved Matters application (RR/2020/2276/P) approved 18/05/21. |
| rved Matters application (RR/2021/1754/P) currently under consideration. |
| rved Matters application (RR/2020/2307/P) for 200 units approved 26/04/21.RDLF |
| d 01/11/17. Reserved Matters (RR/2018/2985/P) approved 04/03/19. Further |
| Neighbourhood Plan allocation H8. |
| |
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| |
| SA site allocation BRO2. |
| 18. Reserved Matters application (RR/2021/409/P) currently under consideration |
| |
| on site. |
| 0/18. Reserved Matters (RR/2019/921/P) approved 30/10/19. |
| er full application (RR/2017/1642/P) for 6 units approved 05/02/19. RDLP 2006 |
| rved Matters (RR/2018/1605/P) approved 23/11/18. RDLP 2006 allocation VL8. |
| rved Matters application (RR/2019/2818/P) approved 01/12/20. |
| ved Matters (RR/2017/1293/P) approved 23/10/18. Several conditions remain to |
| |

Appendix 2: Large sites delegated to approve subject to S106

| | Large sites o | lelegated to approve subje | ct to S106 | | |
|---------------------|----------------|-----------------------------|---------------|-------|---------|
| Area | Ref | Site | Settlement | Units | 2021/22 |
| Bexhill | RR/2020/565/P | Moleynes Mead | Bexhill | 24 | |
| Bexnill | RR/2019/430/P | High School and Drill Halls | Bexhill | 52 | |
| Rural | RR/2019/2738/P | Goddens Gill | Northiam | 34 | |
| Villages | RR/2017/382/P | Hodson's Mill | Robertsbridge | 96 | |
| Hastings Fringes | RR/2015/2264/P | Michael Tyler Factory | Hastings | 40 | |
| | | | Total | 246 | 0 |

| | Expected Phasing of Completions | | | | | | | | | | |
|--|---------------------------------|---------|---------|---------|---------|---------|---------|---------|---------|---------|-------|
| | 2021/22 | 2022/23 | 2023/24 | 2024/25 | 2025/26 | 2026/27 | 2027/28 | 2028/29 | 2029/30 | 2030/31 | Total |
| | | 18 | 6 | | | | | | | | 24 |
| | | | 16 | 36 | | | | | | | 52 |
| | | | 34 | | | | | | | | 34 |
| | | | 32 | 32 | 32 | | | | | | 96 |
| | | | | 20 | 20 | | | | | | 40 |
| | 0 | 18 | 88 | 88 | 52 | 0 | 0 | 0 | 0 | 0 | 246 |

| Planning Notes |
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| Notes |
| Full application (RR/2020/565/P) for 26 units delegated to approve 15/04/21, |
| Outline application (RR/2019/430/P) for up to 52 units delegated to approve 1 |
| Full application (RR/2019/2738/P) for 34 units delegated to approve 13/11/20, |
| Full application (RR/2017/382/P) for 96 units delegated to approve 11/10/18, s |
| Outline application (RR/2015/2264/P) for 40 units delegated to approve 30/05 |
| |

Appendix 3: DaSA allocations

| | DaSA Allocations | | | | | | | Ex | pected P | hasing of | Completio | ons | Planning Note | | | |
|----------|-------------------|-----------------------|--------|----------------|---------|---------|---------|---------|----------|-----------|-----------|---------|---------------|---------|-------|---|
| Area | Settlement | Site | Policy | Units (mid) | 2021/22 | 2022/23 | 2023/24 | 2024/25 | 2025/26 | 2026/27 | 2027/28 | 2028/29 | 2029/30 | 2030/31 | Total | Notes |
| | Bexhill | North Bexhill | BEX3a | 250 | | | | | 60 | 60 | 70 | 60 | | | 250 | Site allocated in the Development and Site Allocations Local Plan for 250 dwellings. |
| | Bexhill | North Bexhill | BEX3b | 130 | | | | | 40 | 40 | 50 | | | | 130 | Site allocated in the Development and Site Allocations Local Plan for 130 dwellings. |
| | Bexhill | North Bexhill | BEX3c | 150 | | | | | 50 | 50 | 50 | | | | 150 | Site allocated in the Development and Site Allocations Local Plan for 150dwellings. |
| Bexhill | Bexhill | Gullivers Bowls Club | BEX5 | 39 | | | | | | 20 | 19 | | | | 39 | Site allocated in the Development and Site Allocations Local Plan for 39 dwellings. Full applications |
| | Bexhill | Cemetery Lodge | BEX6 | 30 | | | | | 20 | 10 | | | | | 30 | Site allocated in the Development and Site Allocations Local Plan for 30 dwellings. |
| | Bexhill | Spindlewood Drive | BEX9 | 160 | | | | | 50 | 50 | 60 | | | | 160 | Site allocated in the Development and Site Allocations Local Plan for 160 dwellings. |
| | Bexhill | Northeye | BEX10 | 140 | | | | | | 40 | 50 | 50 | | | 140 | Site allocated in the Development and Site Allocations Local Plan for 140 dwellings. |
| | Beckley Four Oaks | Hobbs Lane | BEC1 | 14 | | | | | | 7 | 7 | | | | 14 | Site allocated in the Development and Site Allocations Local Plan for 14 dwellings. |
| | Beckley Four Oaks | Buddens Green | BEC2 | 6 | | | | | | 6 | | | | | 6 | Site allocated in the Development and Site Allocations Local Plan for 6 dwellings. |
| | Broad Oak | Land west of A28 | BRO1 | 40 | | | | | | | 20 | 20 | | | 40 | Site allocated in the Development and Site Allocations Local Plan for 40 dwellings. |
| | Broad Oak | Rainbow Trout | BRO2 | 12 | | | | | | 6 | 6 | | | | 12 | Site allocated in the Development and Site Allocations Local Plan for 20 dwellings. Full application |
| | Camber | Former Putting Green | CAM1 | 10 | | | | | | | | 10 | | | 10 | Site allocated in the Development and Site Allocations Local Plan for 10 dwellings. |
| | Catsfield | The White Hart | CAT1 | 35 | | | | | | 15 | 20 | | | | 35 | Site allocated in the Development and Site Allocations Local Plan for 35 dwellings. |
| Rural | Fairlight Cove | Former Market gardens | FAC1 | 16 | | | | | 16 | | | | | | 16 | Site allocated in the Development and Site Allocations Local Plan for 16 dwellings. Full applications |
| Villages | Fairlight Cove | Wakehams Farm | FAC2 | 30 | | | | | 20 | 10 | | | | | 30 | Site allocated in the Development and Site Allocations Local Plan for 30 dwellings. Outline app |
| | lden | Elmsmead | IDE1 | 12 | | | | | | | 12 | | | | 12 | Site allocated in the Development and Site Allocations Local Plan for 12 dwellings. |
| | Northiam | Northiam CE School | NOR1 | 6 | | | | | | 6 | | | | | 6 | Site allocated in the Development and Site Allocations Local Plan for 6 dwellings. |
| | Peasmarsh | Main Street | PEA1 | 45 | | | | | 20 | 25 | | | | | 45 | Site allocated in the Development and Site Allocations Local Plan for 45 dwellings. |
| | Rye Harbour | Stonework Cottages | RHA1 | 40 | | | | | | | 20 | 20 | | | 40 | Site allocated in the Development and Site Allocations Local Plan for 40 dwellings. |
| | Westfield | Moorhurst | WES2 | 40 | | | | | | 20 | 20 | | | | 40 | Site allocated in the Development and Site Allocations Local Plan for 40 dwellings. |
| | Westfield | Goulds Drive | WES3 | 10 | | | | | | 10 | | | | | 10 | Site allocated in the Development and Site Allocations Local Plan for 10 dwellings. |
| | | | Total | 1,215 | 0 | 0 | 0 | 0 | 276 | 375 | 404 | 160 | 0 | 0 | 1,215 | |

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, subject to S106 agreement. DaSA allocation BEX7.

17/12/19, subject to S106 agreement. DaSA allocation BEX8.

0, subject to S106 agreement. RDLP 2006 allocation VL6.

s, subject to S106 agreement.

05/19, subject to S106 agreement. DaSA site allocation HAS2.

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| cation (RR/2021/1455/P) for 8 units currently under consideration. |
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| cation (RR/2018/1813/P) for 8 units approved 04/03/20 on part of the site. |
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| cation (RR/2017/457/P) for 12 units currently at appeal. |
| pplication (RR/2020/151/P) for 43 units currently at appeal. |
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| Neighbourhood Plan Allocations | | | | | | Expected Phasing of Completions | | | | | | | | | | Planning Notes | | | | |
|--------------------------------|------------------|---------------------------|--------|----------------|---------|---------------------------------|---------|---------|---------|---------|---------|---------|---------|---------|-------|--|--|--|--|--|
| Area | Plan | Site | Policy | Units (mid) | 2021/22 | 2 2022/23 | 2023/24 | 2024/25 | 2025/26 | 2026/27 | 2027/28 | 2028/29 | 2029/30 | 2030/31 | Total | Notes | | | | |
| | | Tilling Green, Rye | H3 | 20 | | | | | | 10 | 10 | | | | 20 | Site allocated in the Rye Neighbourhood Plan (made July 2019) for 20 dwellings. | | | | |
| | | Rock Channel, Rye | H4 | 19 | | | | 10 | 9 | | | | | | 19 | Site allocated in the Rye Neighbourhood Plan (made July 2019) for 30 dwellings. Full application (RR/2019/789/P) for 11 dwellings currently under consideration on part of the site. | | | | |
| Rye | Rye NP | Winchelsea Road East, Rye | H5 | 10 | | | | | | 5 | 5 | | | | 10 | Site allocated in the Rye Neighbourhood Plan (made July 2019) for 10 dwellings. | | | | |
| | | Winchelsea Road West, Rye | H6 | 20 | | | | | | 10 | 10 | | | | 20 | Site allocated in the Rye Neighbourhood Plan (made July 2019) for 20 dwellings. | | | | |
| | | Freda Gardham, Rye | H7 | 30 | | | | | | 15 | 15 | | | | 30 | Site allocated in the Rye Neighbourhood Plan (made July 2019) for 20 dwellings. | | | | |
| | | Forewood Lane | CH1 | 12 | | | | | | 6 | 6 | | | | 12 | Site allocated in the Crowhurst Neighbourhood Plan (made July 2019) for 12 dwellings. | | | | |
| | Crowhurst NP | Forewood Rise | CH2 | 12 | | | | | | 6 | 6 | | | | 12 | Site allocated in the Crowhurst Neighbourhood Plan (made July 2019) for 12 dwellings. | | | | |
| | | Station Car Park | СНЗ | 6 | | | | | | | 6 | | | | 6 | Site allocated in the Crowhurst Neighbourhood Plan (made July 2019) for 6 dwellings. | | | | |
| | Salehurst & | Heathfield Gardens | HO2 | 38 | | | | | | 20 | 18 | | | | 38 | Site allocated in the Salehurst & Robertsbridge Neighbourhood Plan (made July 2018) for approx. 35 to 40 dwellings. | | | | |
| | Robertsbridge NP | Vicarage Land | HO2 | 8 | | | | | | 8 | | | | | 8 | Site allocated in the Salehurst & Robertsbridge Neighbourhood Plan (made July 2018) for approx. 6 to 10 dwellings. | | | | |
| Rural | | Sunningdale | SNP 2 | 8 | | | | 8 | | | | | | | 8 | Site allocated in the Sedlescombe Neighbourhood Plan (made April 2018) for approx. 6 to 9 dwellings. Outline application (RR/2019/2485/P) for 8 dwellings currently und consideration. | | | | |
| illages | | Village Hall, North of | SNP 4 | 11 | | | | | | 11 | | | | | 11 | Site allocated in the Sedlescombe Neighbourhood Plan (made April 2018) for approx. 10 to 12 dwellings. | | | | |
| | Sedlescombe NP | Gate Cottage | SNP 7 | 8 | | | | | 8 | | | | | | 8 | Site allocated in the Sedlescombe Neighbourhood Plan (made April 2018) for approx. 8 dwellings. Outline application (RR/2019/1332/P) for 8 dwellings currently under consideration. | | | | |
| | | Church Hill Farm | SNP 8 | 10 | | | | | 10 | | | | | | 10 | Site allocated in the Sedlescombe Neighbourhood Plan (made April 2018) for approx. 10 dwellings. Outline application (RR/2018/3064/P) for 10 dwellings currently under consideration. | | | | |
| | | Wardsdown House | H2(3) | 9 | | | | | | 9 | | | | | 9 | Site allocated in the Ticehurst Neighbourhood Plan (made July 2019) for 9 dwellings. | | | | |
| | Ticehurst NP | Orchard Farm | H2(1) | 6 | | | | | | 6 | | | | | 6 | Site allocated in the Ticehurst Neighbourhood Plan (made July 2019) for 6 dwellings. | | | | |
| | | Singehurst | H2(2) | 10 | | | | 10 | | | | | | | 10 | Site allocated in the Ticehurst Neighbourhood Plan (made July 2019) for 10 dwellings. Full application (RR/2020/585/P) for 10 dwellings currently under consideration. | | | | |
| | | | Total | 237 | 0 | 0 | 0 | 28 | 27 | 106 | 76 | 0 | 0 | 0 | 237 | | | | | |

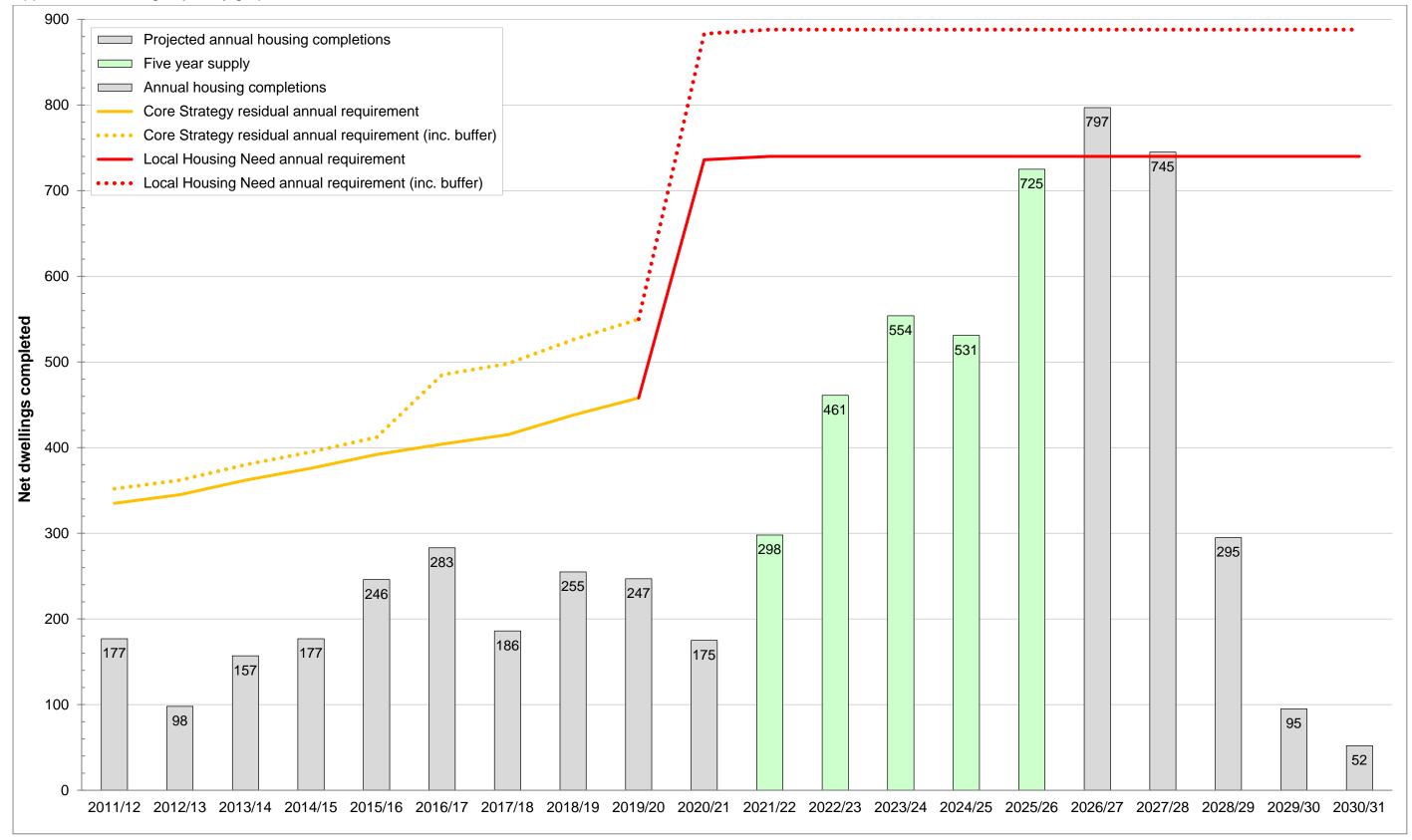
Appendix 4: Neighbourhood Plan allocations

Appendix 5: Housing trajectory table

| Area | 2011/12 | 2012/13 | 2013/14 | 2014/15 | 2015/16 | 2016/17 | 2017/18 | 2018/19 | 2019/20 | 2020/21 | 2021/22 | 2022/23 | 2023/24 | 2024/25 | 2025/26 | 2026/27 | 2027/28 | 2028/29 | 2029/30 | 2030/31 | Total |
|------------------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|-------|
| Bexhill | 35 | 29 | 76 | 82 | 96 | 131 | 84 | 174 | 144 | 95 | 236 | 264 | 247 | 280 | 441 | 450 | 444 | 215 | 65 | 15 | 3,603 |
| Battle | -1 | 7 | 3 | 5 | 7 | 4 | 5 | 4 | 5 | 6 | 7 | 114 | 133 | 70 | 69 | 19 | 18 | 3 | 3 | 3 | 484 |
| Rye | 74 | 14 | 11 | 26 | 73 | 28 | 1 | 5 | 0 | 1 | 3 | 15 | 37 | 43 | 18 | 43 | 43 | 3 | 3 | 10 | 451 |
| Rural Villages | 69 | 47 | 67 | 64 | 62 | 96 | 70 | 63 | 81 | 73 | 52 | 58 | 137 | 118 | 177 | 285 | 240 | 74 | 24 | 24 | 1,881 |
| Hastings Fringes | 0 | 1 | 0 | 0 | 8 | 24 | 26 | 9 | 17 | 0 | 0 | 10 | 0 | 20 | 20 | 0 | 0 | 0 | 0 | 0 | 135 |
| Yearly Total | 177 | 98 | 157 | 177 | 246 | 283 | 186 | 255 | 247 | 175 | 298 | 461 | 554 | 531 | 725 | 797 | 745 | 295 | 95 | 52 | 6,554 |

End of Plan Period

Appendix 6: Housing trajectory graph



Appendix 7: Local Housing Need calculation

| Setting the baseline | 2021 Projection | 2030 Projection | 10yr Growth | Annual Growth over 10yrs |
|---|-----------------|-----------------|--------------------------------------|-------------------------------|
| Set the baseline using national household growth projections (2014-based household projections in England, table 406 unitary authorities and districts in England) for the area of the local authority. Using these projections, calculate the projected average annual household growth over a 10-year period (this should be 10 consecutive years, with the current year being used as the starting point from which to calculate growth over that period). Note that the figures displayed are rounded and individual cells need to be viewed in order to see the full number. | 44,981 | 50,265 | 50,265 - 44,981 = 5,284 | 5,284 / 10 = 528 |

https://www.gov.uk/government/statistical-data-sets/live-tables-on-household-projections

| | An adjustment to take account of affordability | Local Affordability | Adjustment Fa |
|---|---|---------------------|---------------|
| | An adjustment to take account of anordability | Ratio | Calculation |
| | Then adjust the average annual projected household growth figure (as calculated in step 1) based on the affordability of the area. | | |
| | The most recent median workplace-based affordability ratios, published by the Office for National Statistics at a local authority level, should be used. | | |
| 2 | No adjustment is applied where the ratio is 4 or below. For each 1% the ratio is above 4 (with a ratio of 8 representing a 100% increase), the average household growth should be increased by a quarter of a percent. To be able to apply the percentage increase adjustment to the projected growth figure we then need to add 1. | 12.75 | 1.547 |
| | Where an adjustment is to be made, the precise formula is as follows: Adjustment Factor = ((Local Affordability Ratio - 4) / 4) * 0.25 + 1 | | |
| | https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian | | 1 |

| Capping the level of any increase | Capped if Policies less than 5yr old | Capped if Policies more than 5yr old |
|---|---|--------------------------------------|
| A cap is then applied which limits the increases an individual local authority can face. How this is calculated depends on the current status of relevant strategic policies for housing. | | |
| Where these policies were adopted within the last 5 years (at the point of making the calculation), the local housing need figure is capped at 40% above the average annual housing requirement figure set out in the existing policies. | | |
| This also applies where the relevant strategic policies have been reviewed by the authority within the 5-year period and found to not require updating. | | |
| For areas covered by spatial development strategies, the relevant strategic policies are those contained within the spatial development strategy. For example, where a requirement figure for an authority in a spatial development strategy differs from that in a local plan, the figure n the spatial development strategy should be used. | 469 | 740 |
| Where the relevant strategic policies for housing were adopted more than 5 years ago (at the point of making the calculation), the local nousing need figure is capped at 40% above whichever is the higher of: | | |
| a. the projected household growth for the area over the 10-year period identified in step 1; or | | |
| b. the average annual housing requirement figure set out in the most recently adopted strategic policies (if a figure exists). | | |

| Factor | Local Housing |
|--------|--------------------------------|
| ion | Need |
| | 528 x 1.547 = 817 |