



Rother District Local Plan 2020 - 2040

# **Housing and Economic Land Availability Assessment (HELAA)**

## **Part 1: Report**

Draft (Regulation 18) Version - April 2024

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## 1 Introduction

- 1.1 The new Local Plan for Rother will guide sustainable development in the district up to 2040 and set out the Council's planning policy approach to the climate emergency and biodiversity crisis. To support and inform its preparation, a comprehensive and robust evidence base has been developed. The draft Housing and Economic Land Availability Assessment (HELAA) forms part of this evidence base.
- 1.2 The purpose of the HELAA is to provide information on a potential supply of land which is suitable, available and achievable for housing and economic development over the local plan period (2020 to 2040). This process can also be helpful in identifying land that could be suitable for other uses to support future development, such as land for renewable energy, nature recovery and green infrastructure. The Council is required to carry out the HELAA in line with the National Planning Policy Framework (NPPF) (December 2023) and the national Planning Practice Guidance (PPG).
- 1.3 On completion of the HELAA, the key outputs will include:
- A list of housing and economic development sites and broad locations assessed for their suitability, availability and achievability with associated maps.
  - An assessment of each site and broad location in terms of its suitability, availability and achievability, and where relevant, an anticipated timeframe for delivery.
  - Information on site constraints with clear evidence and justification for the assessment outcomes.
  - Where relevant, an assessment of the type and quantity of development for each site, including information on build rates and densities.
  - Strong conclusions explaining why sites that are considered currently suitable for development are preferable to ones that are not.

- 1.4 The HELAA follows a methodology and process set out in the Planning Practice Guidance. The Council's application of the PPG is set out in its HELAA Methodology Paper (April 2022)<sup>1</sup>, attached at Appendix 1.
- 1.5 This document reports on the draft HELAA, as at April 2024. Officers have made significant progress in identifying and assessing sites, however, the process is ongoing and will be informed by the Regulation 18 consultation on the draft Local Plan and further site assessment work.
- 1.6 The draft HELAA comprises:
- Part 1: This report and its appendices;
  - Part 2: Draft site assessments and maps. These are arranged in five chapters, one for each of the five geographical sub-areas considered through the draft Rother Local Plan:
    - Chapter 1: Bexhill;
    - Chapter 2: Hastings Fringes and radial settlements;
    - Chapter 3: Battle and surrounding settlements;
    - Chapter 4: Rye and the eastern settlements cluster; and
    - Chapter 5: Northern Rother.
- 1.7 It is important to note that the HELAA does not pre-empt or prejudice any future Council decisions about any site. It is not a statement of Council policy. It does not determine whether a site should be allocated for future development, as that is the role of a Local Plan or a Neighbourhood Plan. It does not determine whether or not a site will be granted planning permission.
- 1.8 As noted in the PPG: It is the role of the assessment to provide information on the range of sites which are available to meet the local authority's requirements, but it is for the development plan itself to determine which of those sites are the most suitable to meet those requirements.<sup>2</sup>

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<sup>1</sup> Reflecting the time it was written, it should be noted that the Council's HELAA Methodology Paper (April 2022) currently refers to a previous version of the NPPF and it will be updated following the Regulation 18 consultation on the draft Local Plan. The Planning Practice Guidance on housing and economic land availability assessment has not been updated since July 2019 and consequently the references to the PPG in the Council's Methodology Paper remain up to date.

<sup>2</sup> PPG Paragraph: 001 Reference ID: 3-001-20190722

## 2 The national planning policy position

- 2.1 The National Planning Policy Framework (NPPF) (December 2023) confirms at paragraph 60 that: to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed... The overall aim should be to meet as much of an area’s identified housing need as possible.
- 2.2 Paragraph 61 of the NPPF notes: To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area... For Rother, the local housing need assessment comprises the Rother and Hastings joint Housing and Economic Development Needs Assessment (HEDNA) (2024). Rother’s minimum local housing need (LHN) figure (defined using the standard method calculation) is currently 733 dwellings per annum, or 14,660 dwellings over the 20-year period of the new Local Plan (2020-2040). This is in sharp contrast to the annualised adopted Core Strategy target of 335 dwellings per annum, and more than three times as much as the average number of dwellings built annually since 2011 (219 dwellings).<sup>3</sup>
- 2.3 Paragraph 67 of the NPPF confirms: Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period.
- 2.4 Paragraph 69 notes: Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.

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<sup>3</sup> All data correct at 1 April 2023, published in *Rother District Council Housing Land Supply and Housing Trajectory April 2023 Position Statement* (published December 2023).

- 2.5 In relation to housing supply, on its completion the HELAA will determine the amount of land available for residential development and the resulting number of dwellings that could be accommodated in Rother over the plan period, in line with NPPF paragraph 67. This figure may be compared to the minimum local housing need (LHN) figure (defined using the standard method calculation). The HELAA will be an important piece of evidence informing the extent to which the LHN figure can be met in Rother.
- 2.6 In relation to economic land supply, paragraph 8 of the NPPF confirms that an economic objective is one of the three overarching objectives in achieving sustainable development, that is: *to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.* Paragraph 86 of the NPPF sets out the requirements for planning policies, which include to: (b) *set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period.*

### 3 How the HELAA has been developed

- 3.1 As set out in the Council's HELAA Methodology Paper<sup>4</sup>, the PPG includes a five-stage process for carrying out a HELAA:
1. Identification of sites and broad locations
  2. Site/ broad location assessment
  3. Windfall assessment (where justified)
  4. Assessment review
  5. Final Evidence Base.
- 3.2 The following sections briefly explain how this process has been carried out to date.

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<sup>4</sup> At Appendix 1



## 4 Identifying sites for assessment

- 4.1 Having regard to Rother’s very high minimum local housing need (LHN) figure, a very comprehensive search for potential housing and economic sites has been undertaken, to seek to leave “no stone unturned” in identifying potential development sites. This is in line with the PPG, which states:

*It is important that plan-makers do not simply rely on sites that they have been informed about, but actively identify sites through the desktop review process that may assist in meeting the development needs of an area.<sup>5</sup>*

- 4.2 Figure 2 of the Council’s HELAA Methodology Paper (April 2022) details the data sources used in identifying sites for assessment, based on the PPG. The most significant data sources that have been used, and the approximate number of sites identified through those sources are shown in Figure 1.

*Figure 1: Methods of identification of HELAA sites for assessment*

<b>Data source</b>	<b>Approximate number of sites identified<sup>6</sup></b>
Reassessment of sites previously considered through earlier land assessment exercises, including the Council’s Strategic Housing Land Availability Assessment (SHLAA, 2013) and Neighbourhood Plans	310
Public “Call for Sites”, launched in October 2020	210
Council search (sites identified by officers and others)	210
Sites that have been subject to a planning application for the scale of development considered through the HELAA	70
Sites subject to an allocation through the DaSA Local Plan or a Neighbourhood Plan	60
Sites owned by Rother District Council or other Local Authorities	55
Sites on the Council’s Brownfield Land Register	5
<b>TOTAL</b>	<b>920</b>

<sup>5</sup> PPG Paragraph: 010 Reference ID: 3-010-20190722

<sup>6</sup> To calculate the approximate totals in this table, sites are counted only once, although a site may fit into more than one category. For example, sites subject to an allocation may have also been subject to a planning application but are included in the “allocated sites” category only.

- 4.3 Most of the data sources listed in Table 1 are self-explanatory, however, further detail is provided on the Call for Sites and Council Search, below.

### **Call for Sites**

- 4.4 The Council's "Call for Sites" was launched on 12 October 2020, which initially ran to 7 December 2020. As well as being publicised locally and on the Council's website, the following groups received direct notification of the Call for Sites:

- Landowners and land promoters
- Developers
- Planning agents
- Local property agents (residential and commercial)
- Town and parish councils
- Local Enterprise Partnership
- Businesses and relevant local interest groups
- Statutory bodies and local authorities.

- 4.5 To submit a site for consideration, respondents are asked to: complete a standard site submission form, supply a site location plan; and include any relevant supporting evidence (if available).

- 4.6 Following the completion of the initial Call for Sites period in December 2020, in order to allow for further submissions, the Call for Sites has remained open, and a steady stream of sites have since been submitted. The Council will continue to accept site submissions beyond the Regulation 18 publication of the draft Local Plan.

### **Council search (Sites identified by Council officers and members)**

- 4.7 These sites were identified through a number of methods:

- *Settlement Study*. Sites have been identified by Planning Policy officers through the Settlement Study (2024) (published separately in support of the draft Local Plan). The Study involved site visits and desktop surveys of settlements and the identification of unconstrained land on the edges of settlements that could potentially be suitable for development.

- *Discussions and informal workshops.* As part of the Local Plan preparatory work, Planning Policy officers have undertaken discussions and informal workshops with Development Management colleagues, representatives from parish and town councils, representatives from Neighbourhood Plan groups, and elected Rother District councillors. At these meetings, attendees were asked to suggest any sites that could be assessed.
- *Long-term empty properties.* Lists of long-term empty properties were obtained from Rother's Council Tax Department.
- *Electronic Property Information Mapping services (e-PIMS).* Officers consulted the e-PIMS database for details of any potentially available public sector land.

## 5 Site/ broad location assessment

### Stage 1

- 5.1 Once sites had been identified, Stage 1 involved an initial site assessment. Potentially suitable sites were taken forward to Stage 2 for a more detailed assessment, which would include further assessment of suitability, as well as the determination of sites' availability and achievability.
- 5.2 Initial desktop assessments were carried out. This involved:
- Filtering out sites that did not meet the minimum size thresholds for consideration (0.25 hectares or suitable to accommodate at least 5 dwellings, or 500 sqm of employment floorspace).
  - Planning history checks. Where sites had planning permission, information on development progress was obtained, and sites at an advanced stage of construction were also filtered out from further assessment due to being "unavailable" for development.
  - Identifying sites that had previously been assessed, for example sites within the SHLAA or sites that had been the subject of planning applications. The key findings of previous assessments were taken note of.
  - Identification of environmental constraints using the Council's GIS.
- 5.3 Sites were visited by a planning policy officer and usually viewed from the closest public viewpoint, e.g. a public highway or public right of way. An initial site survey was carried out, as set out in the HELAA Methodology paper.

- 5.4 Sites with either extant planning permission, that are currently allocated in the Local or a Neighbourhood Plan or are on the Council's Brownfield Land Register (BLR), have been determined to be suitable, provided that no significant changes in circumstances that may affect their suitability were identified.

## **Stage 2**

- 5.5 Sites which were not ruled out as “unsuitable” at stage 1 were further assessed at stage 2. In many cases this involved consultation with key stakeholders including the Highway Authority and the County Landscape Architect.
- 5.6 At stage 2, the development potential of sites has also been considered, including suitable development uses and an estimation of site capacity (the number of dwellings or amount of employment floorspace that could be accommodated). For new sites, site capacity has been provisionally estimated by considering the density of neighbouring or nearby similar forms of development. The site capacity of those sites which are allocated, or which have planning permission has been carried forward as per the allocation/ permission at this stage. The calculation of site capacities for potentially suitable sites will be further refined and informed by the district-wide Density Study, prepared to support the draft Local Plan.
- 5.7 The availability and achievability of sites has also been considered at stage 2. Where necessary, this has involved Land Registry searches to identify ownership, and the contacting of landowners. Sites have also been assessed in terms of whether there could be a reasonable prospect that the sites will be developed during the course of the plan period (up to 2040).

## **6 Windfall assessment**

- 6.1 Windfall sites are defined in the NPPF as “sites not specifically identified in the development plan”. In accordance with the PPG and paragraph 72 of the NPPF, a windfall allowance may be justified as a component of the district's anticipated supply of housing. Within the HELAA, the PPG allows the Council to identify broad

locations in years 6-15 of the new Local Plan period, which could include a windfall allowance.

- 6.2 There is strong evidence<sup>7</sup> that small windfall sites have consistently come forward across the district in a variety of economic and planning environments and it is reasonable to assume that they will continue to do so in the future.
- 6.3 Initial evidence based on recent data<sup>8</sup> suggests that a windfall projection for the new Local Plan period, comprising the number of houses which may be built on small sites (1-4 dwellings) not allocated or considered in the HELAA, is 39 dwellings per annum.
- 6.4 An initial draft Windfall Assessment Report is attached at Appendix 2. This will be updated and finalised at a later stage in the preparation of the new Local Plan.

## 7 Assessment Review

- 7.1 The PPG<sup>9</sup> states, that in respect of the HELAA:

*Once the sites and broad locations have been assessed, the development potential of all sites can be collected to produce an indicative trajectory. This should set out how much housing and the amount of economic development that can be provided, and at what point in the future (i.e. within years 1 to 5, 6 to 10, and 11 and beyond). An overall risk assessment should be made as to whether sites will come forward as anticipated.*

- 7.2 The fact that the HELAA is not yet complete means that the final evidence base and development trajectory cannot yet be completed. However, the draft new Local Plan sets out “ranges” for the district’s development capacity, based on sites assessed in the draft HELAA. The lower end of the range represents the totals of the “identified sites” and the upper figure representing the identified sites plus the total capacity of “potential additional sites”<sup>10</sup>.

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<sup>7</sup> See the Draft Windfall Assessment Report, attached at Appendix 2.

<sup>8</sup> Draft Rother Windfall Assessment Report, attached at Appendix 2

<sup>9</sup> PPG Paragraph: 024 Reference ID: 3-024-20190722

<sup>10</sup> See Development Strategy and Principles chapter, draft Rother Local Plan 2020-2040

- 7.3 Identified sites are those which are allocated for development, or which have an extant planning permission or a current planning application which has a resolution to grant, subject to a legal agreement. Potential additional sites are those which may be suitable, available and achievable for development over the plan period (as listed in the draft HELAA), subject to further assessment work and the result of the Regulation 18 consultation. The potential additional growth set out in the draft Local Plan does not include those sites listed in the draft HELAA where the availability is currently unknown. These “unknown” potential sites are listed separately in the HELAA site assessments.
- 7.4 Therefore, the potential figures may be subject to change as the Local Plan consultation progresses, as sites are discounted, or alternatively, as additional sites are found to be suitable, available and achievable. Many of the potential sites, listed in the draft HELAA, require more detailed consideration of their impacts, including cumulative impacts. It is also possible that additional sites will be identified through the Regulation 18 consultation.
- 7.5 With these provisos in mind, the draft development potential for the district, based on sites considered in the draft HELAA, is set out in Figure 2 and Figure 3 below. Information to inform an indicative trajectory, setting out at what point in the future the development is expected, is not complete at this stage and therefore, the trajectory will be produced after the Regulation 18 consultation and will form part of the Final HELAA.

Figure 2: Summary of Development Potential in Rother as identified in the draft HELAA: Number of dwellings.

Sub Area – Total Growth	Identified Level of Housing Growth (no. of dwellings)	Potential Additional Level of Housing Growth	Total Potential Housing Growth (Identified + Additional)
Bexhill	2,163	1,235	3,398
Hastings Fringes	120	146	266
Battle and surrounding settlements	403	265	668
Rye and the eastern settlements	390	137	527
Northern Rother settlements	277	346	623
<b>TOTALS</b>	<b>3,353</b>	<b>2,129</b>	<b>5,482</b>

Figure 3: Summary of Development Potential in Rother as identified in the draft HELAA: Employment Floorspace.<sup>11</sup>

Sub Area	Identified Level of Employment Growth (sqm floorspace)	Potential Additional Level of Employment Growth	Total Potential Employment Growth (Identified + Additional) (sqm floorspace)
Total Growth - Bexhill	39,572	19,684	59,256
Total Growth – Hastings Fringes	6,600	0	6,600
Battle and surrounding settlements	10,271	2,700	12,971
Rye and the eastern settlements	13,600	500	14,100
Northern Rother settlements	2,187	3,350	5,537
<b>TOTALS</b>	<b>72,230</b>	<b>26,234</b>	<b>98,464</b>

7.6 The Development Strategy and Principles chapter of the draft Local Plan also includes a table setting out the draft district-wide development potential for the whole Plan period (2020-2040), including development constructed since 2020 and a windfall projection. This information is provided in Figure 4 below.

<sup>11</sup>Note that Table 3 considers employment floorspace only at this stage, and not other forms of economic development such as retail and leisure, which are also considered through the HELAA.

Figure 4: District-wide development potential in the Local Plan, 2020-2040

	Total dwellings	Total employment floorspace (sq. m.)
Constructed 1 April 2020 – 31 March 2023	802	5,927
Known completions and commencements on large sites since 1 April 2023 <sup>12</sup>	340	0
With Planning Permission <sup>13</sup>	1,693	39,440
DaSA and Neighbourhood Plan allocations without permission brought forward	1,660	32,790
Additional HELAA potential sites <sup>14</sup>	2,129	26,234
Windfall projection (across the district)	663	0
<b>Total Range</b>	<b>5,158-7,287</b>	<b>78,165-104,399</b>

7.7 Based on these current draft figures, it is clear that in terms of dwellings numbers, insufficient potential has been identified to meet the local housing need (LHN) figure, calculated using the standard method calculation set out in the NPPF (discussed in section 2 above). The current standard method calculation identifies a need for 14,660 dwellings over the 20-year period of the new Local Plan (2020-2040) (733 dwellings per annum). In contrast, as shown in Figure 4, the potential identified in the HELAA *plus* dwellings already constructed *plus* a windfall projection is between 5,158 and 7,287 dwellings over the 20-year period.

7.8 The PPG<sup>15</sup> states that where the HELAA finds that insufficient sites / broad locations have been identified to meet objectively assessed needs, including the identified local housing need, local planning authorities:

*“.. will need to revisit their assessment, for example to carry out a further call for sites, or changing assumptions about the development potential of particular sites to ensure these make the most efficient use of land. This may include applying a range of densities that reflect the accessibility and potential of different areas, especially for sites in town and city centres, and other locations that are well served by public transport.*

*If insufficient land remains, then it will be necessary to investigate how this shortfall can best be planned for. If there is clear evidence that strategic policies cannot meet the needs of the area, factoring in the constraints, it will be important to establish how needs*

<sup>12</sup> Where the sites are no longer considered through the HELAA. See Appendix 3 for list of sites.

<sup>13</sup> As at time of publication. Excludes sites completed after 31 March 2023.

<sup>14</sup> Includes sites which are understood to be available for development, but not suitable sites that are not known to be available.

<sup>15</sup> PPG Paragraph: 025 Reference ID: 3-025-20190722



*might be met in adjoining areas through the process of preparing statements of common ground, and in accordance with the duty to cooperate. If following this, needs cannot be met then the plan-making authority will have to demonstrate the reasons why as part of the plan examination”.*

- 7.9 The HELAA will be reviewed and completed in accordance with the PPG following the Regulation 18 consultation on the draft Local Plan. This process will also take into account comments received from respondents on the assessed sites, and any additional sites submitted.
- 7.10 In relation to the supply of land for economic development, the Rother and Hastings joint Housing and Economic Development Needs Assessment (HEDNA) (2024) identifies a need for 74,189sqm of employment floorspace over the plan period. Initial figures in the draft HELAA suggest that this need will be met.

## 8 Final Evidence Base

- 8.1 The PPG<sup>16</sup> notes that following the completion of the HELAA, a set of standard outputs are expected to be produced. A draft version of these outputs, namely the site assessments, is provided at Part 2 of the draft HELAA: Site Assessments.

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<sup>16</sup> PPG Paragraph: 026 Reference ID: 3-026-20190722

## Appendix 1: Draft Methodology Paper April 2022

### 1.0 Introduction

- 1.1 A Housing and Economic Land Availability Assessment (HELAA) is required to be carried out in line with the National Planning Policy Framework (July 2021) (the Framework) and the national Planning Practice Guidance (PPG). It will be a document that forms an important part of the evidence base for the new Rother Local Plan to inform plan-making and will provide information on the potential amount of land which is suitable, available and achievable for housing and economic development uses over the plan period.. In addition, it will include a consideration of other land uses to support future development, such as land for renewable energy, nature recovery and green infrastructure.
- 1.2 The HELAA will be the latest iteration of other land availability studies undertaken by the Council in the past, most recently the Strategic Housing Land Availability Assessment (SHLAA) carried out in 2010 and a subsequent update completed in 2013. The main difference between the SHLAA and the HELAA is that the SHLAA focused on determining land availability for housing only, whereas the HELAA will also consider other uses, as set out above. Furthermore, unlike the SHLAA, the HELAA will not use a traffic-light system for assessing sites but will, for each site, determine whether it is suitable, available and achievable for development at this moment in time.
- 1.3 This HELAA Methodology sets out the Council's application of the PPG which will be used going forward.
- 1.4 The HELAA will be an 'evidence-base' document which does not pre-empt or prejudice any future Council decisions about particular sites. It will be an aid to plan-making and not a statement of Council policy. It does not determine whether a site should be allocated for future development, as that is the role of a Local Plan or a Neighbourhood Plan. Specifically, it will inform the preparation of the Rother Local Plan by identifying potential land that may be available for development.
- 1.5 Carrying out the HELAA will enable Rother to:
  - Identify specific sites and broad locations with the potential for housing and economic development, or other land uses.
  - Assess the development potential of sites.
  - Appraise the suitability, availability and achievability of different sites for development in line with the guidance set out in the PPG.

1.6 Completing the HELAA will enable the Council to collect a large volume of information on sites and potential development locations. The key outputs will include:

- A list of potential housing and economic development sites and broad locations with associated location and constraint maps.
- An assessment of each site and broad location in terms of its suitability, availability and achievability, and where relevant, an anticipated timeframe for delivery.
- Information on site constraints with clear evidence and justification for the assessment outcomes.
- Where relevant, an assessment of the type and quantity of development for each site, including information on build rates and densities.
- Strong conclusions explaining why sites that are considered currently suitable for development are preferable to ones that are not.

## 2.0 Policy Context

2.1 Paragraph 60 of the Framework states that in order to support the Government’s objective of significantly boosting the supply of homes, *it is important that a sufficient amount and variety of land can come forward where it is needed.*

2.2 The requirement to carry out a HELAA is contained within the Framework. In respect of housing, paragraph 68 states:

*Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:*

*a) specific, deliverable sites for years one to five of the plan period, including an appropriate buffer [which in the case of Rother is currently 20%].*

*b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.*

2.3 Small and medium sized sites are specifically mentioned at paragraph 69 of the Framework and are noted to make an important contribution to meeting the housing requirement of an area. The Framework recommends that local planning authorities, through the development plan and brownfield registers, should identify at least 10% of their housing requirement on sites no larger than one hectare, unless there are strong reasons why this target cannot be achieved.

2.4 The Framework (paragraph 71) advises that an allowance can be made for windfall sites<sup>17</sup> but there needs to be compelling evidence that they will bring a reliable source of supply. Any allowance should be realistic, having regard to the HELAA, historic windfall delivery rates<sup>18</sup> and expected future trends.

2.5 In relation to economic development, paragraph 81 of the Framework notes:

*Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development...*

2.6 While paragraph 82 (part b) sets out the requirements for planning policies, which include:

*set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period.*

2.7 The PPG includes guidance on housing and economic land availability assessment and, in relation to potential housing land, sets out a methodology to identify a future supply of land which is suitable, available and achievable for housing over the plan period. The PPG advises that plan-making authorities may carry out land availability assessments for housing and economic development as part of the same exercise, in order that sites may be identified for the use(s) which is most appropriate. The HELAA will be carried out in the context of the latest guidance, which was last updated in July 2019.

### 3.0 Methodology

3.1 Figure 1 (see below) is taken from the PPG and sets out the stages that local planning authorities should go through in carrying out the HELAA. An explanation of what each stage will entail, and how it will be carried out in the context of Rother district, is further explained in the remainder of this document.

3.2 The PPG expects plan-making bodies to have regard to the guidance in preparing and updating their assessments and also explains that the guidance indicates what inputs and processes can lead to a robust assessment of land availability.

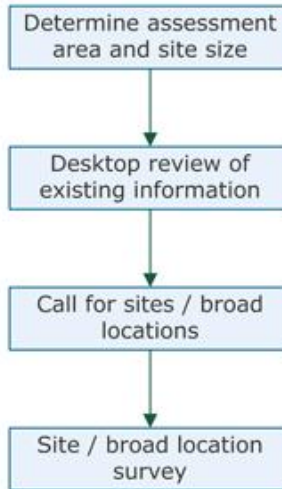
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<sup>17</sup> A windfall site is defined in the National Planning Policy Framework as a site not specifically identified [for development] in the development plan.

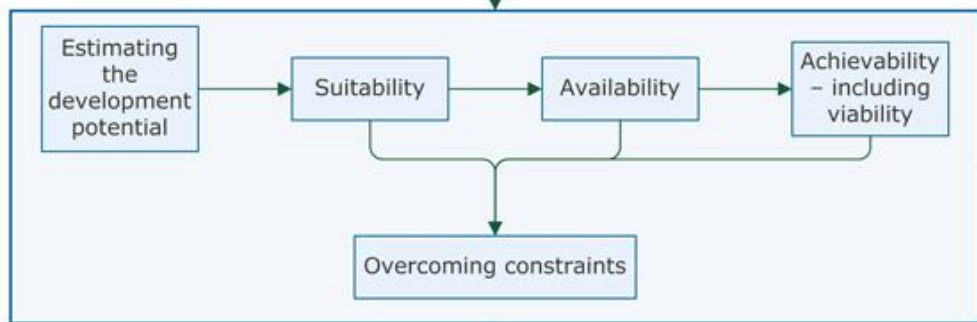
<sup>18</sup> Historic windfall delivery rates means the number of dwellings the Council has historically approved on “windfall” sites (sites not identified in the development plan). The rates over the previous ten years are detailed in the [Rother District Council Housing Land Supply Position Statement](#). Since 2011, dwellings completed on windfall sites have made up approximately 28% of large site completions and 20% of total completions in the district, averaging 40 dwellings per year.

Figure 1: PPG Methodology Flowchart

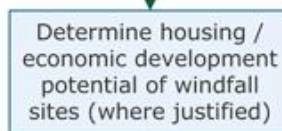
**Stage 1 - Site / broad location identification**



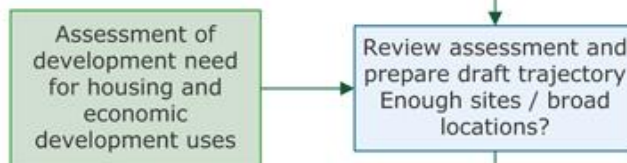
**Stage 2 - Site / broad location assessment**



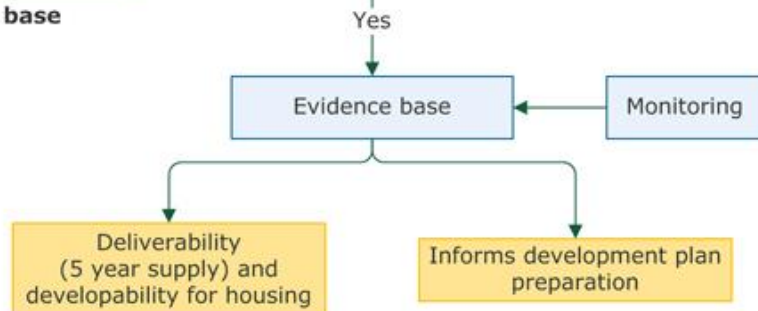
**Stage 3 - Windfall assessment**



**Stage 4 - Assessment review**



**Stage 5 - Final evidence base**



No

## Stage 1: Identification of sites and broad locations

### Determining the assessment area

- 3.3 The PPG confirms that the area selected for the assessment should be the plan-making area. This can be the local planning authority area, two or more local authority areas, areas covered by a spatial development strategy, or areas covered by the Local Enterprise Partnership. In this case, the plan making area is the district of Rother and this will be the area which the HELAA will cover.

### Who should Rother District Council work with?

- 3.4 As advised at paragraph 007 of the PPG, the assessment will be undertaken and regularly reviewed. Rother shares its housing market area and functional economic market area with Hastings Borough Council (HBC) and as such and in line with the guidance, is working with them in line with the duty to cooperate.
- 3.5 It is also important to involve landowners and promoters; local property agents; developers; local communities; Local Enterprise Partnerships; businesses and their local representative organisations; parish and town councils and neighbourhood forums preparing neighbourhood plans. These groups will be given the opportunity to submit details of any potential sites for housing and economic land that they wish to be considered.

### Size of sites and broad locations to be assessed

- 3.6 Paragraph 009 of the PPG states that plan-makers will need to assess a range of different site sizes from small scale sites to opportunities for large scale developments such as village and town extensions and new settlements where appropriate. In terms of housing, sites capable of delivering five or more dwellings is suggested and for economic development sites measuring 0.25 hectares (or 500 square metres of floor space) and above, although it does say that plan-makers may wish to consider alternative site size thresholds. The Framework expects a minimum proportion of the sites identified as suitable for housing to be no larger than one hectare, unless there are strong reasons why this cannot be achieved.
- 3.7 For resource efficiency purposes, the identification of sites in Rother will be limited to those capable of accommodating five dwellings or more for residential proposals or 0.25 hectares or more (or 500 square metres or more of floor space) for economic proposals. These thresholds are slightly lower than Rother's current monitoring process and Annual Monitoring Report which sub-divides 'small' and 'large' sites at a six dwellings threshold.

- 3.8 In addition, small scale development boundary amendments will also be considered. These must adjoin existing development boundaries and will take into consideration sites that are below the five dwellings threshold.

How sites and broad locations will be identified

- 3.9 In line with paragraph 010 of the PPG, when carrying out the desktop review, a proactive approach will be taken to identify as wide a range of sites and broad locations for development as possible (including those existing sites that could be improved, intensified or changed). Identified sites, which have particular constraints, will be included in the assessment for the sake of comprehensiveness but the constraints will be set out clearly, including where they severely restrict development. The assessment will identify sites and their constraints, rather than simply rule out sites outright which are known to have constraints.
- 3.10 In Rother, the High Weald Area of Outstanding Natural Beauty (AONB) has over 82% coverage, whilst large parts of the remainder of the district are subject to other constraints such as international habitat designations and flood risk. The AONB is recognised through national policy as a protected area, where application of policies in the Framework provide a strong reason for restricting the overall scale, type or distribution of development in the plan area, and will be appropriately considered by the relevant evidence based studies used to inform the Local Plan. Nevertheless, housing and economic requirements necessitate some development within the AONB. Development in rural areas will also be necessary and justified to meet local needs.

Types of sites and sources of data to be used

- 3.11 The PPG advises that plan-makers should consider all available types of sites and sources of data that may be relevant in the assessment process. It confirms:

*It is important that plan-makers do not simply rely on sites that they have been informed about, but actively identify sites through the desktop review process that may assist in meeting the development needs of an area.*

- 3.12 The table below (Figure 2) is based on a table in the PPG and highlights data sources that will be used in identifying different types of sites. In addition, the knowledge of council officers and Councillors will be used to help to identify potential sites.

Figure 2: Data sources used in identifying sites

Type of site (as listed in PPG)	Data sources that sites will be drawn from
Existing housing and economic development allocations and site development briefs not yet with planning permission.	<ul style="list-style-type: none"> <li>• Development and Site Allocations Local Plan.</li> <li>• 'Made' Neighbourhood Plans including those for Battle, Crowhurst, Rye, Salehurst and Robertsbridge, Sedlescombe and Ticehurst.</li> <li>• Planning application records.</li> <li>• Development Briefs including the North East Bexhill 'Masterplan' SPD and Camber Village SPD.</li> </ul>
Planning permissions for housing and economic development that are unimplemented or under construction.	<ul style="list-style-type: none"> <li>• Planning application records.</li> <li>• Development starts and completions records.</li> </ul>
Planning applications that have been refused or withdrawn.	<ul style="list-style-type: none"> <li>• Planning application records - review reasons for refusal/withdrawal and assess the potential for issues to be resolved.</li> <li>• Assess viability.</li> </ul>
Land in the local authority's ownership.	<ul style="list-style-type: none"> <li>• Local authority records.</li> </ul>
Surplus and likely to become surplus public sector land.	<ul style="list-style-type: none"> <li>• National register of public sector land.</li> <li>• Engagement with strategic plans of other public sector bodies such as county councils, central government, National Health Service, police, fire services, utilities services, statutory undertakers.</li> </ul>
Sites with permission in principle and identified brownfield land.	<ul style="list-style-type: none"> <li>• Brownfield land register.</li> </ul>
Vacant and derelict land and buildings (including empty homes, redundant and disused agricultural buildings, potential permitted development changes, e.g. offices to residential)	<ul style="list-style-type: none"> <li>• Local authority records.</li> <li>• English Housing Survey.</li> <li>• Commercial property databases (e.g. estate agents and property agents).</li> <li>• Active engagement with sector.</li> <li>• Brownfield land registers.</li> <li>• Prior Notification applications.</li> </ul>
Additional opportunities for unestablished uses (e.g. making productive use of under-utilised facilities such as garage blocks).	<ul style="list-style-type: none"> <li>• Ordnance Survey maps.</li> <li>• Aerial photography.</li> <li>• Planning applications.</li> <li>• Site surveys.</li> <li>• Call for sites.</li> <li>• Windfall sites.</li> </ul>
Business requirements and aspirations.	<ul style="list-style-type: none"> <li>• Enquiries received by the local planning authority.</li> </ul>



	<ul style="list-style-type: none"> <li>• Active engagement with the sector, including with Locate East Sussex.</li> <li>• Call for sites.</li> </ul>
<p>Sites in rural locations; Large scale redevelopment and redesign of existing residential or economic areas; Sites in adjoining villages and rural exceptions sites; and Potential urban extensions and new free-standing settlements.</p>	<ul style="list-style-type: none"> <li>• Development and Site Allocations Local Plan.</li> <li>• ‘Made’ Neighbourhood Plans including those for Battle, Crowhurst, Rye, Salehurst and Robertsbridge, Sedlescombe and Ticehurst.</li> <li>• Planning applications.</li> <li>• Ordnance Survey maps.</li> <li>• Aerial photography.</li> <li>• Site surveys.</li> <li>• Call for sites.</li> <li>• Omission sites.</li> <li>• Other previously assessed sites (2013 SHLAA – not allocated or permitted).</li> </ul>

Call for sites and broad locations

3.13 The call for sites and broad locations will be aimed at as wide an audience as is practicable, including those not usually involved in property development. The call for sites will target the following groups and people:

- Town and parish councils
- Relevant bodies undertaking neighbourhood plans.
- Landowners and promoters
- Developers
- Planning agents
- Local property agents (residential and commercial).
- Local Enterprise Partnerships.
- Businesses and relevant local interest groups.
- Local publicity.

3.14 The information that will be sought from respondents will include:

- Site location, to include a plan to identify the land;
- Suggested potential type of development;
- Details relating to the suitability, availability and achievability of sites;
- Constraints to development; and
- Any supporting evidence/studies which the landowner/land promoter/developer has undertaken to support development of the site.

3.15 Brownfield sites submitted for housing during the call for sites will also be considered for the next iteration of the Council’s Brownfield Land Register.

What will be included in the site and broad location survey?

- 3.16 The survey will include a comprehensive list of sites and broad locations derived from data sources (set out in Figure 2) and the call for sites.
- 3.17 Prior to a more detailed survey, a desktop assessment of sites and broad locations will be carried out on the following basis:
- Review sites previously considered, for example sites identified within the previous SHLAA, unimplemented planning permissions.
  - Validate information gathered through the call for sites.
  - Carry out planning history checks.
  - Where sites have planning permission, obtain up to date information on development progress.
  - Gain a more detailed understanding of deliverability, any barriers and how they could be overcome.
  - Identify further sites with potential for development that were not identified through data sources or the call for sites. This may include natural extensions to sites that have been identified through the call for sites which are in separate ownership and remaining parcels of land between identified sites.

Information to be recorded during the Stage 1 site survey

- 3.18 During the site survey and/or desktop review the following information will be recorded:
- Site size, boundaries and location.
  - Current land use and character.
  - Land uses and character of the surrounding area.
  - Physical constraints such as access, contamination, topography, flood risk, natural features of significance, location of infrastructure/utilities.
  - Potential environmental constraints (AONB, flood risk, habitat designations etc.) See figure 3 below for detail on the Council's approach to considering constraints.
  - Identify any barriers which may impact on deliverability and how they may be overcome.
  - Consistency with national policies, and development plan policies where relevant.
  - Proximity to services and other infrastructure, such as public transport.
  - Potential for low carbon and renewable energy (either as part of a development, or a standalone scheme)
  - Initial assessment of whether the site is suitable for a particular type of use or as part of a mixed-use development.

- Gain a better understanding of what type (use) and scale of development may be appropriate by looking at neighbouring uses and densities.

**Stage 2: site/broad location assessment**

- 3.19 If a site is identified during the Stage 1 review as being unsuitable for development with little prospect of constraints being overcome then it will not be taken forward for further assessment. This will require a judgement by the assessing officers. Reasons for the decision will be clearly set out. It should be noted however that the exclusion of a site from the HELAA does not rule out a site from ever being developed or from being considered again in the future, should circumstances change.
- 3.20 All sites not excluded at the end of the Stage 1 process will be taken forward to Stage 2 for more detailed assessment of their suitability, availability and achievability.

Assessing the suitability of sites and broad locations

- 3.21 A site or broad location can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated (paragraph 018 of the PPG).
- 3.22 When considering constraints, the information collected as part of the initial site survey will be considered together with an assessment against local<sup>19</sup> and national policy; the appropriateness and the likely market attractiveness of the type of development proposed; and the potential impacts including the effects on landscapes, including landscape features, nature and heritage conservation. Key stakeholders, such as the Highway Authority, National Highways, Southern Water, Environment Agency, Natural England and the High Weald AONB Unit, amongst others, will need to be consulted at this stage, where necessary and practicable, to provide their expert input.
- 3.23 Figure 3 below sets out the Council’s approach to considering common constraints when assessing a site/broad location’s suitability for development. It should be noted that this list is not exhaustive.

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<sup>19</sup> The PPG confirms: “When assessing sites against the adopted development plan, plan-makers will need to take account of how up to date the plan policies are and consider the relevance of identified constraints on sites / broad locations and whether such constraints may be overcome. When using the emerging plan to assess suitability, plan-makers will need to account for potential policy changes or other factors which could impact the suitability of the site / broad location.”

Figure 3: Approach to assessing constraints

Constraint	Approach to assessment
Ancient Woodland	<p>Sites where ancient woodland would be lost or adversely impacted will be rejected in line with paragraph 180 (c) of the Framework, unless there are wholly exceptional circumstances as set out in footnote 63 of the Framework. Where there is ancient woodland on or near to the site which could be retained, which may include mitigation, sites will not be ruled out. The Standing Advice from Natural England should be utilised and Natural England should be consulted directly where necessary.</p>
High Weald AONB	<p>Paragraph 177 of the Framework rules out major development within the AONB other than in exceptional circumstances. For the purpose of paragraph 177, 'major development' is defined as a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined. Sites will not be ruled out for constituting 'major development' but will need to be identified as such within the assessment.</p> <p>Guidance has been received from the High Weald AONB Unit on assessing sites in the AONB. All such sites will be considered against the five defining components of character, as set out in the <a href="#">High Weald AONB Management Plan</a>:</p> <ul style="list-style-type: none"> <li>• Geology, landform, water systems and climate</li> <li>• Settlement</li> <li>• Routeways</li> <li>• Woodland</li> <li>• Field and heath (including consideration of the effect on historic field patterns).</li> </ul> <p>The High Weald AONB Unit will be consulted, where practicable, on sites likely to have a moderate to high impact.</p>
Landscape impact	<p>Sites outside of the AONB will need to be assessed in terms of landscape impact and how they affect the setting of any settlements they relate to as well as the character and appearance of the surrounding countryside.</p> <p>Existing Landscape Character Assessments will be considered, and the County Landscape Architect will be consulted where necessary.</p>
Topography and land conditions	<p>The topography of the site will be described, and any land stability issues identified, with the potential for impact of development in terms of earthworks flagged. Any form of potential harm to the character and appearance of an area or the extent of any necessary works which</p>

	could impact on viability or limit the amount of development will be recorded.
Development boundaries	Development boundaries will not be applied as a constraint to site suitability as amendments can be undertaken through the Local Plan process to accommodate development needs in the future.
Employment land	Existing employment sites will generally be viewed as unsuitable for residential uses unless deemed surplus to requirements in any future employment land review or comprehensive evidence is provided to demonstrate that there is no reasonable prospect of an employment use continuing.
Other uses	In accordance with paragraphs 93 (c) and 99 of the Framework, community facilities, sports grounds and buildings and recreation facilities will generally be viewed as unsuitable for residential uses the criteria set out in the Framework is met.
Flood zones and drainage	<p>In accordance with paragraphs 159-165 of the Framework, sites falling entirely within the functional floodplain (zone 3b) will be considered unsuitable. Sites in flood zone 3a will only be included where the exception test is applied and passed. Where part of the site falls within zone 3b, this part of the site will be excluded from the calculation of the developable area.</p> <p>Sites within the Fairlight and Pett Level Drainage Area and Pevensey Levels Hydrological Catchment Area, together with any that may be identified within the Strategic Flood Risk Assessment as having surface water flooding issues and those known to have drainage issues, will be flagged.</p> <p>The Environment Agency and Lead Local Flood Authority will be consulted where necessary.</p>
Heritage designations and their setting	<p>In line with Chapter 16 of the Framework, designated and non-designated heritage assets will be identified, with the potential for impact flagged. Any form of potential harm (whether substantial or less than substantial) will be recorded.</p> <p>The Council's Conservation Officer and/or Historic England will be consulted where necessary.</p>
International, national and local habitat designations	In line with paragraphs 180 (b) and 181 of the framework, sites or parts of sites within national and international designations will not be considered suitable. Sites adjacent or near to will be flagged. Locally protected sites and areas of Priority Habitat will be noted and assessed in line with paragraphs 175 and 179 of the Framework. The County Ecologist will be consulted where necessary.

	Sites within SSSI Impact Risk Zones will be noted where the Risk Zone relates to a residential or commercial use.
Open space	Paragraph 99 of the Framework seek to retain open space. Sites which would result in the complete loss or reduction in open space will not be considered suitable.
Access and sustainable transport	An assessment will be made of whether access is available to the site and any highway safety issues will be identified. The site's sustainability in terms of access to services by public transport, walking and cycling will be considered together with whether such access can be improved.  The Highway Authority will be consulted where necessary.
Infrastructure and utilities	Any availability issues will be flagged.
Waste or minerals development or infrastructure	If the site is shown as being within a Minerals or Waste Consultation Area, the Minerals and Waste Planning Authority (East Sussex County Council) will be consulted where necessary.
Close to District Boundary	For sites adjoining or in close proximity to the District Boundary, the relevant adjoining Authority will be consulted where necessary.

### Estimating the development potential of sites and broad locations

- 3.24 Where a site has planning permission or a relatively recent expired permission, the quantum of development that was granted will be used to guide the site capacity.
- 3.25 For sites with no planning permission, or any permission expired more than 10 years ago, consideration will be made to site circumstances, previous planning permissions and adjacent development, where relevant, when considering density. This includes looking at higher densities in more accessible locations.
- 3.26 Paragraph 124 of the Framework states that planning policies should support development that makes efficient use of land but explains that the prevailing character of areas should be maintained and the importance of securing well designed, attractive and healthy places should be taken into account. Paragraph 125 of the Framework states that where there is an existing or anticipated shortage of land for identified housing needs it is especially important for policies to avoid homes being built at low densities. In these circumstances, paragraph 125 notes that *plans should include the use of minimum density standards for city and town centres and other locations that are well served by public transport, and that the use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas...*

3.27 When assessing HELAA sites, the development potential of each site will be calculated by making the most effective use of land whilst also applying a density appropriate to the site context, which is of particular importance within the High Weald AONB in order to protect its landscape, character and scenic beauty. In more accessible urban areas, it may be appropriate to raise densities and use a range for the number of units.

Assessing the availability of sites and broad locations

3.28 Paragraph 019 of the PPG states that a site can be considered available for development, when, on the best information available (confirmed by the call for sites and information from landowners and legal searches where appropriate), there is confidence that there are no legal or ownership impediments to development. For example, land controlled by a developer or landowner who has expressed an interest to develop may be considered available.

3.29 The existence of planning permission can be a good indication of the availability of sites. Sites meeting the definition of deliverable<sup>20</sup> should be considered available unless evidence indicates otherwise. Sites without permission can be considered available within the first five years. Consideration can also be given to the delivery record of the developers or landowners putting forward sites, and whether the planning background of a site shows a history of unimplemented permissions.

3.30 Figure 4 below identifies some of the potential considerations in determining whether a particular site is available.

Figure 4: Considerations of Availability

Consideration	Approach to assessment
Ransom strip, multiple ownership, access via a private road and other access issues.	Flag as potential issues to resolve, where necessary.
Interest of owner/developer	If a site has been put forward by the landowner or a developer on behalf of a landowner, this should be viewed as showing an interest to develop the land and thus available
Planning permission extant	This will generally indicate that a site is available.
Sites with existing occupiers and site is not clear for development	Evidence will need to be obtained of if and when the site is likely to become vacant.

<sup>20</sup> As set out in the NPPF Glossary

Assessing the achievability of sites and broad locations, including whether development would be viable

- 3.31 A site is considered achievable for development where there is a reasonable prospect that it will be developed for the intended use at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period. The market, cost and delivery factors will all need to be taken into consideration and are expanded on below.
- Market factors – such as adjacent uses, economic viability of existing, proposed and alternative uses in terms of land values, locality, market demand and projected rate sales;
  - Cost factors – to include site preparation costs, any exceptional works necessary, planning standards and obligations, prospect of funding or investment to address identified constraints;
  - Delivery factors – including developer phasing, build-out rates, whether there is a single or several developers offering different housing products and the size and capacity of the developer.

Overcoming constraints

- 3.32 Where constraints have been flagged as an issue, more detailed investigations will be carried out to establish whether mitigation could resolve any conflict with policy, or whether issues relating to ownership, for example, are likely to be resolved easily. It should be noted that some constraints, such as location within the functional floodplain or SSSI designation, will not be able to be overcome and will mean those sites will not be progressed. This will be clearly set out in the site assessment.

**Stage 3: Windfall Assessment**

Windfall assessment

- 3.33 A windfall allowance may be justified in the anticipated supply if there is compelling evidence as set out in paragraph 71 of the Framework. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. A separate detailed windfall methodology assessment will be carried out.

**Stage 4: Assessment Review**

- 3.34 Upon completion of the assessments for the site and broad locations, the development potential will be known and thus an indicative trajectory will be



produced. The number of units for housing and the total site area for economic uses will be provided together with information on at which point it is likely to come forward in the future (years 1 – 5; 6 – 10; or 11 and beyond). An overall risk assessment will also be carried out as to whether sites will come forward as anticipated, which will be aligned to the Council’s assessment of its 5 year housing supply and whether sites are coming forward as anticipated, together with reasons for any delays.

Plan of action in the event that there are insufficient sites and broad locations identified to meet the objectively assessed needs

- 3.35 The Government’s standard method for calculating local housing need, as set out in the Framework and PPG, provides a minimum number of homes to be planned for (“the objectively assessed need”). Local Authorities are required to use the standard method as the starting point when preparing the housing requirement in their plan, unless exceptional circumstances justify an alternative approach.
- 3.36 If the HELAA identifies insufficient sites to meet Rother’s objectively assessed needs, the following steps will be taken to seek additional sites and broad locations:
- The development potential for each of the previously identified sites or broad locations will be reassessed for any changes in circumstances which may now make the development deliverable.
  - If necessary and prudent the Council will consider the benefits of undertaking a further call for sites.
- 3.37 In the event that insufficient land still remains and there is clear evidence that strategic policies cannot meet the needs of the area, factoring in the constraints, the Council will establish whether the needs may be met in neighbouring areas through preparation of statements of common ground in accordance with the duty to cooperate.
- 3.38 If the plan of action outlined above fails to yield sufficient sites and broad locations to meet the need, the Council will need to prepare and demonstrate robust reasons why it is unable to meet the need and fully explain this during the Plan examination.

**Stage 5: Final Evidence Base**

- 3.39 Following the completion of the assessment, as outlined in stages 1 to 4 above, the outputs listed below will need to be provided:
- A list of all the sites and broad locations that have been considered cross referenced to their location on a map.
  - An assessment of each site or broad location, including:

- Where these have been discounted, evidence justifying the reasons given.
- Where these are considered suitable, available and achievable, the potential type and quantity of development, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when;
- An indicative trajectory of anticipated development based on the evidence available.

### Monitoring

- 3.39 A full re-survey of sites and broad locations will normally take place when the development plan has to be reviewed or when there are other significant changes such as new guidance or changes in circumstances.

## Appendix 2 Draft Windfall Assessment April 2024

### 1. Introduction

- 1.1. This Windfall Assessment has been prepared to enable the Council to justify, in the context of national planning guidance, the likely contribution that windfall sites can make to the district's housing requirement for the emerging Rother District Local Plan (2020-2040). As such, it will also provide justification for the inclusion of a windfall allowance in the calculation of the District's five year housing land supply position.
- 1.2. This Assessment also considers the most appropriate means of calculating the quantity of new dwellings that could be expected to be delivered on windfall sites and any issues that may impact on the calculation of the windfall allowance.
- 1.3. This Assessment essentially forms part of the Housing and Economic Land Availability Assessment (HELAA) insofar that it assesses the quantum of development that is likely to come forward over the Plan period, for which the HELAA cannot account.

### 2. Planning Policy Framework

#### National Policy

- 2.1. While there is no requirement to include a windfall allowance in the district's housing requirement or five-year housing land supply calculations, paragraph 70 (d) of the National Planning Policy Framework (NPPF, December 2023) states that local planning authorities should:

“support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes”

- 2.2. Paragraph 72 of the NPPF goes on to state that:
- “Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.”
- 2.3. It is therefore clear that, where windfalls have historically been a significant component of housing supply, and there is evidence that indicates they will continue to provide a reliable source of supply, an allowance for windfall sites in the District’s housing requirement should be included, as well as within any housing supply trajectory or five year housing land supply calculations.

### **Adopted Local Policy**

#### Rother District Local Plan (RDLP) 2011 - 2028

- 2.4. The RDLP 2011-2028 does not have a specific policy regarding a windfall allowance, however, estimated small site windfalls are included in the District’s housing requirement, as discussed in paragraphs 7.51 to 7.59 of the [Core Strategy](#)<sup>21</sup>.
- 2.5. Furthermore, Appendix 3 - Components of Housing Supply, on page 197 of the Core Strategy, presents a breakdown of estimated small site windfalls in years 5 - 15, between the main spatial areas of Bexhill, Battle, Rye, the Rural Areas and the Hastings Fringes.
- 2.6. In total, a small site windfall allowance of 460 dwellings was included in the housing requirement, equating to 46 dwellings per annum over the 10-year period from 1 April 2018 to 31 March 2028.

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<sup>21</sup> <https://www.rother.gov.uk/planning-and-building-control/planning-policy/corestrategy/>

### 3. Definition of windfall

- 3.1. Windfall are defined in Annex 2 (Glossary) to the NPPF as:  
“Sites not specifically identified in the development plan.”
- 3.2. For Rother, this means that sites which have not been identified in a Local Plan, Neighbourhood Plan or Supplementary Planning Document (SPD) will be considered as windfall sites. This includes allocated sites and sites that had planning permission at the base date of the various Plans.
- 3.3. As such, this Windfall Assessment is closely linked to the Housing and Economic Land Availability Assessment (HELAA), which is seeking to identify all potential sites of five or more dwellings in order to assess their development potential.

#### **Relationship with the HELAA**

- 3.4. It is common practice for HELAAs to exclude sites below a certain size threshold so that it can focus on the larger, more strategic sites<sup>22</sup>, as the resource implications of identifying and assessing all sites, regardless of size, would be significant and would also diminish the scope of the Assessment.
- 3.5. The HELAA methodology sets out that all potential sites of at least 0.25 hectares and/or being capable of accommodating five or more dwellings will be assessed, with sites smaller than this threshold (sites of between one and four dwellings) being considered as windfall.
- 3.6. In terms of sites larger than this threshold (sites of five dwellings or more), it is expected that all greenfield sites which are deliverable or developable will be identified in the HELAA and therefore contribute to the housing supply.
- 3.7. It should be recognised, however, that the HELAA does not have the scope to be able to identify all potential sites of five or more dwellings. These will be sites that

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<sup>22</sup> <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

have unexpectedly become available and, in most cases, would be on brownfield (previously developed) land.

- 3.8. This could include development such as conversions, for example where a large house is to be converted into several flats, or changes of use, perhaps where a redundant or unviable care home is proposed to be split into several residential dwellings.
- 3.9. “Permitted developments” (developments not requiring planning permission)<sup>23</sup> are particularly unlikely to be identified within the HELAA and are likely to form the majority of the unidentified large sites.

## 4. Methodology

4.1. This Windfall Assessment will consider the following factors:

- Small site completions
- Settlements with development boundaries
- Development of residential gardens
- Spatial distribution

### **Small site completions**

- 4.2. As discussed previously, the HELAA is seeking to identify all sites of five or more dwellings in order to assess sites for their development potential, with small sites of between one and four dwellings being considered as windfall through this Assessment.
- 4.3. As discussed in paragraph 3.7, though it is recognised that the HELAA does not have the scope to be able to identify all potential sites of five or more dwellings, it is not considered appropriate to propose a large site windfall allowance through this Assessment, due to the unpredictability in those sites coming forward.

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<sup>23</sup> As set out in The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), for example, some changes of use from other uses to dwellinghouses.

- 4.4. Therefore, this Assessment will be based on an analysis of net housing completions on small windfall sites only, over a 10-year period from 1 April 2009 to 31 March 2019. This period provides a robust evidence base, covering periods of economic growth and decline. It will consider completions, as opposed to permissions, as this reflects actual delivery and will not necessitate any further discounting to account for non-delivery e.g., implementation rate.

### **Development boundaries**

- 4.5. It is important to consider the role that settlement development boundaries play in encouraging or discouraging small sites to come forward, both over the 10-year period being analysed and in the future. This is because where development boundaries are in place, windfall developments are currently able to come forward and are generally supported, and where development boundaries are not in place, settlements are considered to be part of “the countryside” where the creation of new dwellings is strictly controlled.<sup>24</sup>
- 4.6. This is clearly demonstrated when looking at the number of newly permitted small sites in the four settlements which had their development boundaries removed upon adoption of the DaSA in December 2019. These were the settlements of Winchelsea Beach, Pett Level, Norman’s Bay and Friar’s Hill.
- 4.7. In the 10-year period prior to the removal of their development boundaries, there was a total of 25 dwellings permitted on small sites within these settlements. In the three years afterwards however, there were no small sites permitted.
- 4.8. Therefore, in order for this analysis to be considered robust, any completions within these settlements should be excluded, as it is assumed that future small site completions within these settlements will be substantially lower.
- 4.9. Furthermore, while the draft new Local Plan proposes to continue the current adopted position on development boundaries, it also proposes to review each

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<sup>24</sup> The Core Strategy sets out that new dwellings in the countryside are only supported in specific circumstances, such as where there is a need for agricultural workers accommodation. The draft new Local Plan takes a similar approach.

settlement's boundary following the Regulation 18 consultation. Therefore, this analysis takes the baseline position of the current Development Plan<sup>25</sup>, with no new development boundaries being applied to settlements and no settlements having current development boundaries being removed.

- 4.10. Likewise, new Local Plan policies controlling the creation of new dwellings in the Countryside are still at consultation stage. Therefore, this analysis must again take the baseline position of the current Development Plan, see **Policy RA3: Development in the Countryside** of the Core Strategy, where the creation of new dwellings in the Countryside is only supported in specific circumstances.

### **Development of residential gardens**

- 4.11. With regard to the development of residential gardens, paragraph 72 of the NPPF states that:

“Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.”

- 4.12. Therefore, to be consistent with the NPPF, the analysis will identify and exclude completions that involve the development of residential gardens.
- 4.13. More specifically, this analysis will exclude developments that result in the creation of additional dwellings on residential gardens whilst retaining the original dwelling. Redevelopments of residential dwellings that include gardens will still be considered in the analysis as this is viewed as comprehensive redevelopment.

### **Spatial distribution**

- 4.14. This Assessment will propose separate small site windfall allowances for each of the District's main spatial areas, as set out in the Core Strategy. These are Bexhill, Battle, Rye, the Hastings Fringes and the Rural Areas.

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<sup>25</sup> Consisting of the development boundary policies in the DaSA Local Plan, made Neighbourhood Plans and the saved development boundary policies in the Rother District Local Plan 2006.



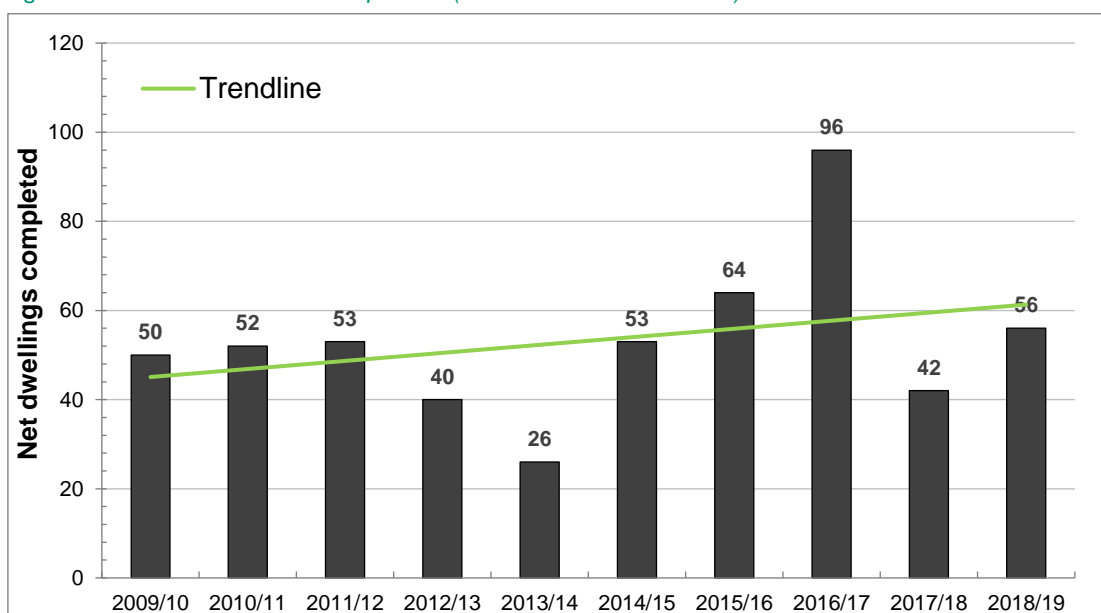
- 4.15. Therefore, this analysis will break down the completions over the 10-year period into those five spatial areas in order to provide separate figures.
- 4.16. The Rural Areas will then be disaggregated into Rural Villages (those villages with development boundaries) and the Countryside (villages without development boundaries and isolated dwellings within the countryside) so that the completions in the Countryside can be further analysed.
- 4.17. This is necessary as the creation of new dwellings in the Countryside is only permitted in exceptional circumstances. By analysing the Countryside completions separately, the Council can demonstrate whether they will continue to contribute to the districts housing supply in the future and should therefore be considered within the proposed small site windfall allowance.

## 5. Small site windfall analysis

### Step 1: Measuring small site completions

- 5.1. Figure 1 shows annual net completions on small sites over the period 1 April 2009 to 31 March 2019. In total there have been 532 dwellings completed, equating to an average of some 53 dwellings a year.

Figure 1: Annual net small site completions (01/04/2009 - 31/03/2019)



- 5.2. Year on year, the number of small site completions has been fairly steady with a slight upward trend indicated above. There are two notable exceptions in 2013/14 and in 2016/17, where there were 26 and 96 small site completions, respectively.
- 5.3. A breakdown of small site completions by settlement is presented in section 9 of this appendix.

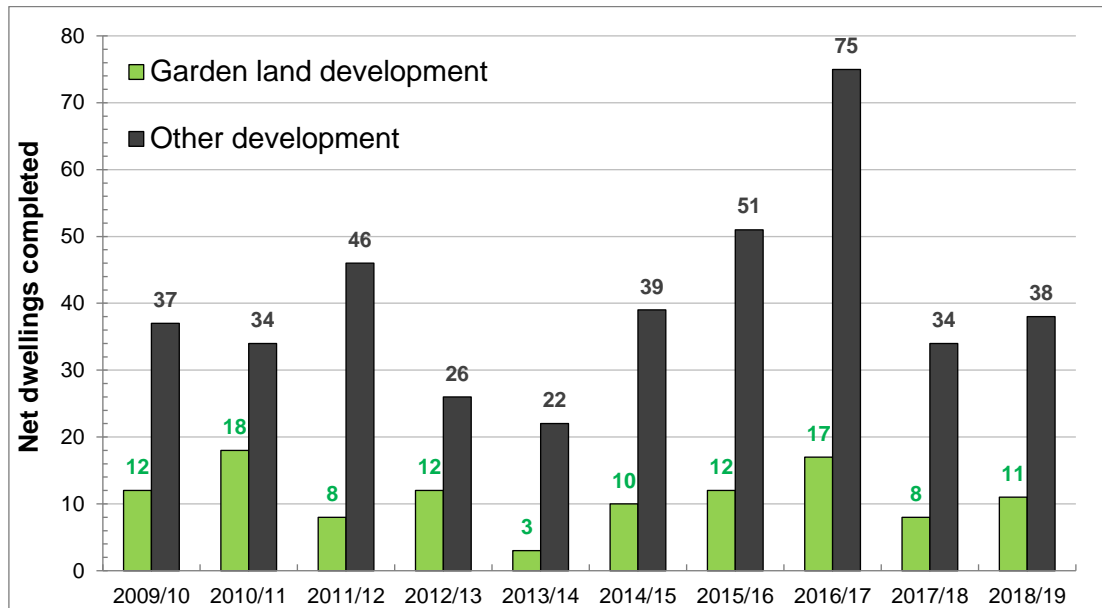
### **Step 2: Excluding sites where development boundaries were removed**

- 5.4. As discussed in the Methodology, development boundaries play an important role in encouraging or discouraging small sites to come forward. As the development boundaries for Winchelsea Beach, Pett Level, Norman's Bay and Friar's Hill were removed in the DaSA Local Plan, any completions in those settlements over the 10-year period being analysed, should be removed.
- 5.5. This equates to 19 small site completions, composed of 11 dwellings in Winchelsea Beach, six dwellings in Pett Level and two dwellings in Norman's Bay. There were no completions in Friar's Hill.
- 5.6. Excluding the 19 completions in the above settlements reduces the total number of completions to carry forward in the analysis to 513 dwellings.

### **Step 3: Excluding residential garden sites**

- 5.7. Figure 2 shows the annual split between garden land development and other development. Of the 513 completions analysed, 111 completions have been categorised as garden land development, which is some 22%.

Figure 2: Small site completions on garden land (01/04/2009 - 31/03/2019)



5.8. Excluding the 111 completions on garden land reduces the total number of completions to carry forward in the analysis to 402 dwellings.

**Step 4: Spatial distribution**

5.9. Figure 3 shows that there have been 132 completions on small sites in Bexhill, 122 in Rural Villages, 86 in the Countryside, 33 in Rye, 28 in Battle and one completion in the Hastings Fringes.

Figure 3: Spatial distribution of small site completions (01/04/2009 - 31/03/2019)

Spatial Area	Dwellings
Bexhill	132
Rural Areas - Rural Villages	122
Rural Areas - Countryside	86
Rye	33
Battle	28
Hastings Fringes	1
<b>Total</b>	<b>402</b>

Completions in the Countryside

5.10. Small site completions in the Countryside have been grouped into categories based on the reason for being granted planning permission and are shown in Figure 4.

Figure 4: Reason for approval of small site completions in the Countryside

Reason for approval	Dwellings
Alternative commercial use unviable/unsuitable	37
Agricultural/Key Worker	22
Residential use previously established	8
Unknown	6
Lack of a 5-year supply	5
Character improvement	4
Other	4
<b>Total</b>	<b>86</b>

- 5.11. It can be seen that six of the completions were granted for an unknown reason. The permissions for these completions are all relatively old and the officer's reports are not available at the time of analysis. As these completions cannot be demonstrated to provide a reliable source of supply in the future, it is proposed to exclude them from further analysis.
- 5.12. The five completions identified as being approved due to a lack of five-year supply were all granted at appeal and it's unlikely that they would have been approved if the Council had been able to demonstrate a five-year supply of housing. It is expected that the Council will be able to demonstrate a five-year supply on adoption of the RDLP 2019-2039 and so these five dwellings should also be excluded from further analysis.
- 5.13. All other completions are considered to be reliable enough to count towards the small site windfall allowance, leaving the Countryside with a figure of 75 to carry forward in the calculation.

#### Adjusted spatial distribution

- 5.14. Figure 5 shows the final spatial distribution after analysis, with the Rural Villages and Countryside recombined into the Rural Areas.

Figure 5: Adjusted spatial distribution of small site completions (01/04/2009 - 31/03/2019)

Spatial Area	Dwellings
Rural Areas	197
Bexhill	132
Battle	33
Rye	28
Hastings Fringes	1
<b>Total</b>	<b>391</b>

## 6. Proposed small site windfall allowance

- 6.1. It is not proposed to include an allowance for small site windfalls in the first three years of the Plan period, on the basis that any small site completions likely to be delivered over the first three years will already have planning permission and will therefore already be contributing towards the districts housing supply. This ensures no 'double-counting'.
- 6.2. This approach will also apply when calculating the districts five-year housing land supply position, with a small site windfall allowance being included only in years four and five for the reasons outlined above.
- 6.3. An appropriate figure to take forward as a small site windfall allowance is considered to be 39 dwellings per annum, as set out in Figure 6 below. This represents a total small site windfall allowance of 663 dwellings over the 17-year period from 1 April 2022 to 31 March 2039.

Figure 6: Proposed small site windfall allowance by spatial area

Spatial Area	Dwellings completed over past 10 years	Annual avg. & proposed dwelling allowance	Projected dwellings over 17 years
Rural Areas	197	20	340
Bexhill	132	13	221
Battle	33	3	51
Rye	28	3	51
Hastings Fringes	1	0	0
<b>District Total</b>	<b>391</b>	<b>39</b>	<b>663</b>

- 6.4. It is considered that proposing a small site windfall allowance for the Rural Areas as a whole, is more appropriate than individual allowances for each Rural Village due to the low number of completions involved. In fact, as shown in Figure 7, there are only two Rural Villages that have averaged one or more completions per annum over the past 10 years.

Figure 7: Small site windfall completions in Rural Villages (01/04/2009 - 31/03/2019)

Rural Villages	Dwellings	Annual Avg.
Beckley Four Oaks	6	0.6
Brede	2	0.2
Broad Oak	6	0.6
Burwash	-1	-0.1
Burwash Common	5	0.5
Burwash Weald	3	0.3
Cackle Street	6	0.6
Camber	8	0.8
Catsfield	1	0.1
Crowhurst	1	0.1
Etchingham	4	0.4
Fairlight Cove	8	0.8
<b>Hurst Green</b>	<b>14</b>	<b>1.4</b>
Icklesham	2	0.2
Iden	3	0.3
Netherfield	7	0.7
Northiam	8	0.8
<b>Peasmarsh</b>	<b>10</b>	<b>1.0</b>
Pett	4	0.4
Robertsbridge	3	0.3
Rye Harbour	1	0.1
Sedlescombe	9	0.9
Staplecross	4	0.4
Stonegate	4	0.4
Three Oaks	1	0.1
Ticehurst	-5	-0.5
Westfield	5	0.5
Winchelsea	3	0.3
<b>Total</b>	<b>122</b>	<b>12.2</b>

- 6.5. In practice this will mean that when calculating residual requirements against a Rural Villages housing requirement, windfall cannot be included within individual Rural Villages identified housing supply trajectories.
- 6.6. However, any completions on windfall sites within individual Rural Villages should still be deducted from their overall housing requirements when calculating any residual requirements for the purposes of producing a Local or Neighbourhood Plan.

## 7. Updating the Windfall Assessment

- 7.1. As noted previously in this Assessment, the proposed small site windfall allowance may be affected by:
- the application of new development boundaries to settlements and/or their removal;
  - changes to policies controlling the creation of new dwellings in the Countryside; and
  - changes to the spatial strategy.
- 7.2. As such it will be necessary to update the Windfall Assessment, prior to adoption of the new Rother Local Plan, to account for these variables and make any adjustments to the proposed small site windfall allowance.

## 8. Conclusion

- 8.1. There is strong evidence that small windfall sites have consistently come forward across the District in a variety of economic and planning environments and it is reasonable to assume that they will continue to do so in the future.
- 8.2. It is considered that this Windfall Assessment provides robust justification for likely contribution that windfall sites can make to the Districts housing supply and for the inclusion of a windfall allowance in years for and five of the five year housing land supply position.

## 9. Net small site completions by settlement (2009/10 - 2018/19)

Settlement	Dwellings
Bexhill	178
Countryside	68
Battle	41
Rye	37
Peasmarsh	16
Hurst Green	14
Northiam	12
Fairlight Cove	11
Winchelsea Beach	11
Beckley Four Oaks	10
Sedlescombe	10
Cackle Street	9
Camber	8
Netherfield	8
Westfield	8
Broad Oak	7
Brede	6
Burwash Common	6
Pett Level	6
Etchingham	5
Pett	5
Robertsbridge	5
Staplecross	5
Icklesham	4
Stonegate	4
Burwash Weald	3
Catsfield	3
Iden	3
Kent Street	3
Winchelsea	3
Woods Corner	3
Cottenden	2
Guestling Green	2
Mill Corner	2
Normans Bay	2
Broad Street	1
Crowhurst	1
Darwell Hole	1
Hastings Fringes	1
Holton Hill	1
Horns Cross	1
Rye Harbour	1
Silver Hill	1
Swaile's Green	1
Three Oaks	1



<b>Settlement</b>	<b>Dwellings</b>
Udimore	1
Watermill	1
Westfield Lane	1
Ticehurst	0
Burwash	-1
<b>Total</b>	<b>532</b>

## Appendix 3: List of sites removed from the HELAA 2020-2024 due to being completed or commenced

Site Address	Parish	Planning History	Notes	Counted in completions 1/4/20-31/3/23	Dwellings not yet counted in completions
Lillybank Farm, Land west of London Road, Wattles Wish, Battle	Battle	Outline application (RR/2016/725/P) for 50 units approved 09/05/17. Reserved Matters application (RR/2017/1136/P) approved 29/09/17.	Construction commenced Q1 2020/21. As of Sep 2022, construction not yet completed but advanced so site not available.	24 dwellings completed 2023 (out of 50 dwellings)	26
Land south of North Trade Road, Battle	Battle	Outline application (RR/2017/2390/P) for 25 units. Reserved Matters (24 dwellings) (RR/2020/2276/P) approved May 2021.	Now fully constructed (June 2023) - site unavailable.	Does not appear to be included.	24
Land at Darvel Down, Netherfield	Battle	Outline application (RR/2017/2308/P) for 25 units approved 22/10/18. Reserved Matters (RR/2019/921/P) approved 30/10/19).	28/5/23 - development well advanced on site. Site unavailable.	Does not appear to be included.	25
Land at Tollgates, Battle	Battle	Outline application RR/2017/1259/P for 63 units approved 01/11/17. Reserved Matters RR/2020/165/P approved. RR/2022/156/P - Variation of condition 1 imposed on RR/2020/165/P - approved.	Development complete 2022, site unavailable.	All accounted for	0

Site Address	Parish	Planning History	Notes	Counted in completions 1/4/20-31/3/23	Dwellings not yet counted in completions
8 High Street, Battle	Battle	Approved Conditional: RR/2022/964/P (& equivalent listed application) - Conversion of the building to provide commercial shop unit to ground floor with 5no residential flats. RR/2019/2812/P - Reconfiguration of shop unit to ground floor and conversion to 5no residential flats.	Development Complete.	Listed in 2023 but 0 dwellings	5
Land at Gullivers Bowls Club, Knole Road, Bexhill	Bexhill	RR/2021/1455/P - Replacement of club house, refurbishment of indoor bowls rink and the erection of 8 no. 2-bedroom dwellings together with associated car parking and landscaping - approved April 2022.	Construction complete Feb 2024 - site unavailable.	Does not appear to be included.	8
40-42 Cooden Sea Road, Bexhill on Sea	Bexhill	RR/2020/1170/P - Alterations and extensions of existing building from 1 retail unit (A1) and 1 dwelling (A3) to form 3 x commercial units (A1/A2) and 8no. additional dwellings (C3). Approved 8-9-2020.	Development completed – site unavailable.	Listed in 2022	0
79 - 85 London Road, Bexhill	Bexhill	RR/2017/460/P - Re-development of site with terrace of 5 houses.	Implemented.	Commenced in 2019.	0

Site Address	Parish	Planning History	Notes	Counted in completions 1/4/20-31/3/23	Dwellings not yet counted in completions
Worsham Farm Site A, Land North of Wrestwood Road	Bexhill	RR/2015/1760/P – outline: residential-led mixed-use urban extension comprising up to 1,050 residential dwellings up to 7,000sqm business floorspace, primary school and children's nursery; and other supporting and community uses. Approved 2016. Detailed planning permission (RR/2016/3245/P) for the first phase (200 dwellings) was granted in 2017 and this development is under construction.	This is phase 1, with detailed PP for 200 dwellings. It is substantially complete (Sep 23) so unavailable for HELAA purposes.	49 dwellings 2023, 61 dwellings 2022, 23 dwellings 2021. 67 dwellings outstanding.	67
Preston Hall Farm, Watermill Lane, Bexhill	Bexhill	RR/2017/2441/P - 139 dwellings and open space - approved conditional 2018. RR/2020/398/P - application to vary the S106.	Development complete, site unavailable.	All accounted for: 14 dwellings 2021, 125 dwellings 2023.	0
St Andrew's Church, Wickham Avenue, Bexhill	Bexhill	RR/2018/273/P - Conversion of redundant church building into 11 flats including external alterations and erection of bin store and bike/external store building.	Complete.	All accounted for 2022	0

Site Address	Parish	Planning History	Notes	Counted in completions 1/4/20-31/3/23	Dwellings not yet counted in completions
92 London Road, The Sussex Hotel	Bexhill	RR/2019/2289/P - Proposed extension & change of use of hotel/public house to form offices and 10 no. self-contained flats. RR/2021/2749/P - Change of use of ground floor to Nursery - approved Jan 2022.	July 2023: development largely complete - site unavailable.	Does not appear to be included.	10
Preston Cottage, Watermill Lane, Bexhill	Bexhill	RR/2019/2811/P - outline: 4 dwellings plus retention of existing dwelling - approved 2020. RR/2021/1727/P - Reserved matters pursuant to outline PP RR/2023/1027/P - Outline planning permission for the erection of 1x detached dwelling. Approved conditional.	Under construction so site unavailable (Sep 23).	Does not appear to be included.	5
26 Collington Avenue, Bexhill	Bexhill	RR/2020/468/P - Conversion and extension to provide nine residential units. Approved. RR/2022/331/P - Variation of condition 2 imposed on planning permission RR/2020/468/P.	Development complete – site unavailable.	All accounted for 2023	0
17 & 17A Dorset Road South, Bexhill	Bexhill	Most recent pp is RR/2019/1229/P (variation of condition).	Development complete - site unavailable.	Included in 2023 but 0 dwellings	4

Site Address	Parish	Planning History	Notes	Counted in completions 1/4/20-31/3/23	Dwellings not yet counted in completions
Bexhill Enterprise Park (Phase 1), Glovers Lane, Bexhill-on-Sea	Bexhill	This site is the southern section only of the larger site which was subject to outline planning permission RR/2013/2166/P - (15,000sqm employment floorspace) and is itself subject to approved reserved matters RR/2014/414/P.	This site has full planning permission for business use (RR/2013/2166/P and RR/2014/414/P) and has been fully constructed. Not available.	Completed some time ago.	0
3 & 4 Endwell Road, Bexhill	Bexhill	RR/2022/472/PN3 – Prior approval: Change of use from commercial, business and service use to 5 no. dwellinghouses. This relates to the first and second floor. RR/2022/2185/PN3 - Prior approval: conversion of ground floor offices into 4 self-contained dwellings.	Feb 2024: development largely complete. Site unavailable.	Does not appear to be included.	9
Land adjacent to Glendorie, Old Lydd Road, Camber	Camber	Site has planning permission for 5 dwellings (RR/2020/1050/P) but also 4 dwellings (RR/2020/1051/P). S73 application to amend the 4 dwellings permission granted 2022.	Development well advanced - site not available.	Does not appear to be included.	4
The Warren Yard, Horns Corner, Catsfield	Catsfield	RR/2018/1309/P - redevelopment of the site to provide a new office building (1,216sqm) with associated parking and 6 No. houses.	Completed - site no longer available.	Accounted for 2020	0

Site Address	Parish	Planning History	Notes	Counted in completions 1/4/20-31/3/23	Dwellings not yet counted in completions
Skinner's Lane, Catsfield	Catsfield	RR/2018/1580/P - Erection of 9 houses, comprising 4 x 3 bed semi-detached houses, 4 x 2 bed terraced houses, and 1 x 4 bed detached house, with associated car parking, landscaping, access and relocated field access.	Completed - site no longer available.	Accounted for 2021	0
Land at the Former Market Garden, Lower Waites Lane, Fairlight Cove	Fairlight	RR/2017/457/P - 16 dwellings - granted on appeal	Site under construction - not available.	Does not appear to be included.	16
Land at Bachelors Bump, Winchelsea Road, Guestling	Guestling	RR/2018/2040/P - 10 dwellings – approved. RR/2021/629/P - Variation of condition (design changes) - approved.	2023: Site is under construction - not available.	Does not appear to be included.	10
Land at Rock Lane (Opposite Tedder Terrace)	Guestling	RR/2015/1514/P - 26 dwellings - now constructed.	Site now fully constructed.	Constructed some time ago	0
Land East of Foundry Close, Hurst Green	Hurst Green	RR/2019/2194/P - 20 houses - approved conditional. Deed of variation to S106 approved 2022 in respect of agreed mix of affordable housing.	Site unavailable, under construction (2023).	Included in 2023 but 0 dwellings	20
Land off Main Road	Icklesham	RR/2019/243/P - 15 affordable dwellings - approved Sep 2020.	Fully constructed.	Accounted for 2023	0
Land south of the Paddock/Goddens Gill, Northiam	Northiam	RR/2019/2738 - 34 dwellings - approved. Various conditions applications currently under consideration.	February 2022: site under construction - not available.	Included in 2023 but 0 dwellings	34
Alpines, Ewhurst Lane	Northiam	RR/2015/1030/P approved for 4 dwellings		Old planning permission	0

Site Address	Parish	Planning History	Notes	Counted in completions 1/4/20-31/3/23	Dwellings not yet counted in completions
Land at Friars Cote Farm Buildings, Northiam	Northiam	RR/2020/896/P - Commercial storage (Class B8) and an office suite (Class B1a).	Site has been developed with B1/ B8 buildings, not available.	Employment	0
Club Horizon & Granary Club, 48 Ferry Road, Rye	Rye	RR/2018/1828/P – change of use to residential (7 apartments) and 2 x commercial units - approved.	Development complete, sit unavailable.	Accounted for 2023	0
74 Fishmarket Road, Rye	Rye	RR/2021/1162/P - approved - Demolition of existing garage workshop for new development of 7 flat & retail units. Conversion of existing timber framed building.	Construction largely complete (Oct 2022), site unavailable.	Does not appear to be included.	7
Hillbury Field, Ticehurst	Ticehurst	RR/2019/2818/P – 30 dwellings.	Spring 2023: Construction well -advanced, site unavailable for HELAA purposes.	3 dwellings 2023, out of 30	27
Flimwell Bird Park (Site A), Hawkhurst Road	Ticehurst	RR/2014/1089/P	Constructed, no longer available.	Old planning permission.	0
Banky Field, Ticehurst	Ticehurst	RR/2018/2209/P	Site constructed and therefore no longer available	Accounted for 2021	0
Land at Westfield Down, Westfield	Westfield	RR/2009/322/P Outline - 39 dwellings - approved. RR/2017/1293/P - Approval of reserved matters.	Under construction - not available.	Does not appear to be included.	39
<b>Total number of dwellings not included in completions to 31/03/2023 -</b>					<b>340</b>



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**Rother District Council**

Town Hall

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