



# HOUSING DELIVERY TEST **ACTION PLAN**

## 2023 MEASUREMENT

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# 1 Introduction

## Background

- 1.1 National Government is committed to the improved delivery of new homes through their economic and housing growth agendas, as well as the recent changes enacted through the Levelling Up and Regeneration Act 2023. Government have introduced several measures and reforms to the planning system intended to deliver more housing, improve housing affordability and remove barriers to development. Local Planning Authorities (LPAs) are challenged to be more proactive in increasing the speed and quantity of housing delivery to meet the identified housing needs of their local area.
- 1.2 Rother District Council (RDC) is responding to this challenge and is seeking to increase and accelerate the rate of housing delivery across the district.
- 1.3 The Housing Delivery Test (HDT) was introduced by the Government in 2018 as a monitoring tool to demonstrate whether Local Planning Authorities are building enough homes to meet their housing need. The HDT compares the number of new homes delivered over the previous three years with the authority's housing requirement. The results of the HDT will be used to determine the buffer to apply in housing land supply position statements and whether the presumption in favour of sustainable development should apply. Under the HDT, the December 2024 National Planning Policy Framework (NPPF) sets out in paragraph 79 the consequences for under-delivery, which are summarised in Table 1 below.

Table 1: Housing Delivery Test consequences as set out in NPPF (2024), paragraph 79

Delivery Performance	Consequence
Under 95%	Prepare an Action Plan <sup>1</sup>
Under 85%	Prepare an Action Plan and include a 20% buffer in the 5-year Housing Land Supply
Under 75%	Prepare an Action Plan, include a 20% buffer in the 5-year Housing Land Supply, and the presumption in favour of sustainable development applies.

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<sup>1</sup> The Action Plan must assess the causes of under-delivery and identify actions to increase delivery in future years.

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- 1.4 Where an Action Plan is required, this should be prepared within six months of the test results being published. The Government published the HDT results for the 2023 measurement on 12 December 2024 and as such the Council must produce and publish this Action Plan before 19 June 2025.
- 1.5 The Council published a Housing Land Supply Position Statement in December 2024, which reports on the financial year to April 2024. However, the Council's Position Statement for 2023 is comparable to the HDT measurements for April 2023 (the current results) and has been used as the primary source of data in this Action Plan.
- 1.6 The 2023 HDT measurement covers the three-year period from 1 April 2020 to 31 March 2023. This Action Plan responds to this 2023 HDT measurement, although the identified actions are up to date as of June 2025.
- 1.7 The first year of the measurement (2020/21) was assessed against the Local Housing Need figure<sup>2</sup> with a reduction by 4 months to account for the COVID-19 pandemic. This reduction was stated to account for the disruption to local authority planning services and the construction sector caused by COVID-19 pandemic and subsequent national lockdowns. The second and third years were also assessed against the Local Housing Need figure, though no reduction was applied.
- 1.8 Against a requirement of 1,967 dwellings over the three year period 1 April 2020 to 31 March 2023, Rother delivered 843 net dwellings with a result of 43%. Consequently, the Council is required to publish this Action Plan, include a 20% buffer in its five-year housing land supply position statements, and apply the NPPF's presumption in favour of sustainable development. This is a continued position from the previous (2022) HDT result.
- 1.9 It is important to consider Rother's HDT result in the context of performance of other local planning authorities across the country.<sup>3</sup> According to the Government's published data,<sup>4</sup> of the HDT 2023, 65% of authorities 'passed' the test with no further actions required, with the remaining 35% subject to

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<sup>2</sup> The Local Housing Need figure is an annual assessment of the number of homes need in an area. It is calculated through the standard method, which uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply. It is important to note that this calculation identifies a minimum annual housing need figure. It does not produce a housing requirement figure.

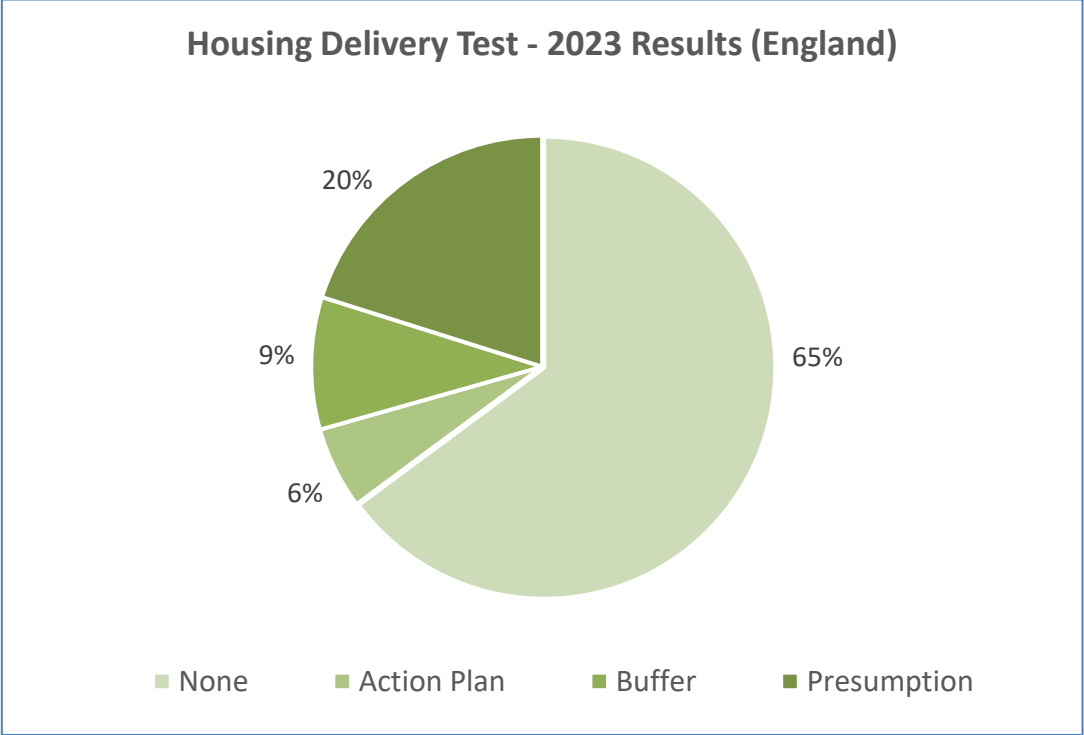
<https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

<sup>3</sup> This includes local planning authorities, development corporations, and joint local plan areas.

<sup>4</sup> <https://www.gov.uk/government/publications/housing-delivery-test-2023-measurement>

sanctions under the NPPF, as illustrated in the chart below. Rother District Council is one of 63 authorities (representing 20% of authorities in England) required to include a 20% buffer in its five-year housing land supply, along with having to prepare an Action Plan. In short, Rother is not alone in terms of its recent performance on housing delivery.

Figure 1: Housing Delivery Test 2023, results for authorities in England



## Purpose, objectives and status

- 1.10 This Action Plan provides an analysis of the key reasons for the historic under-performance against the district's housing requirement and identifies the measures the Council intend to undertake to increase the delivery of new housing in Rother district. As noted above, while the data (primarily set out in section 2 of this report) covers the period 2020-2023 as required in accordance with the HDT measurement period, the measures identified to increase the delivery of new housing in Rother, set out in section 3 and Appendix 1 of this report, are up to date as of June 2025.
- 1.11 The Council recognises that delivering growth is complex. Whilst several of the actions identified in this Action Plan are solely within the remit of the Council to resolve, to successfully respond to the challenge of increasing, and then maintaining, housing delivery the Council will also need the support and co-operation of those involved in delivering homes and supporting infrastructure including landowners, house builders and infrastructure providers.

## Relationship to other plans/strategies and council activities

- 1.12 This Action Plan complements existing Council plans, policies and strategies which provide a framework for the delivery of the Council's housing priorities. This includes the following:
- [New Local Plan<sup>5</sup>](#) - Once adopted, the new Local Plan will set out the spatial strategy for the distribution and development of new homes, employment and supporting infrastructure in Rother, while protecting valued natural and historic environment. It will seek a significant uplift in the delivery of housing through the development strategy, having regard to the Government's Local Housing Need figure. The new Local Plan will replace the existing Local Plan Core Strategy, Development and Site Allocations (DaSA) Local Plan and any remaining extant policies from the Rother District Local Plan 2006.
  - [Local Plan Core Strategy<sup>6</sup>](#) - Part 1 of the current Local Plan, the Core Strategy sets out the vision and overall spatial strategy for the district. This includes providing the framework for future housing and sets district targets for the numbers of additional homes over the period 2011 - 2028.

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<sup>5</sup> <https://www.rother.gov.uk/planning-and-building-control/planning-policy/newlocalplan/>

<sup>6</sup> <http://www.rother.gov.uk/CoreStrategy>

- Development and Site Allocations ([DaSA](http://www.rother.gov.uk/dasa)) [Local Plan](#)<sup>7</sup> - Part 2 of the current Local Plan, the DaSA allocates sites to deliver, and give spatial expression to, the housing targets set out in the Core Strategy.
- [Rother District Local Plan 2006](http://www.rother.gov.uk/rotherdistrictlocalplan2006)<sup>8</sup> - Whilst the Core Strategy and DaSA have largely superseded the policies in the earlier 2006 Rother District Local Plan, there remains a few exceptions; relating to site allocations and development boundaries within designated Neighbourhood Areas where a Neighbourhood Plan is yet to be 'made' or has not allocated land.
- [Neighbourhood Plans](http://www.rother.gov.uk/neighbourhoodplans)<sup>9</sup> - There are eight 'made' neighbourhood plans in the district. These are in the parishes of Battle, Burwash, Crowhurst, Peasmarch, Rye, Salehurst & Robertsbridge, Sedlescombe, and Ticehurst. Each of the plans allocates sites to be in conformity with the targets of the Core Strategy, except for the Burwash NP, which instead relies on DaSA Policy OVE1 (Housing supply and delivery pending plans). The district also has two other neighbourhood plans in preparation for the neighbourhood areas of Etchingham and Hurst Green.
- [Our Council Plan 2024-2028](#): The Council's corporate plan also includes strategic Core Aims themed around housing delivery. This includes increasing the supply of affordable homes throughout the district and bringing Rother above a five-year land supply by delivering the new Local Plan (2020-2040) with policies that speed up the overall planning process; achieving planning permission on Council-owned land and land owned through Rother DC Housing Company Ltd (previously known as Alliance Homes (Rother)); and working with the Sussex Community Housing Hub and Registered Providers to bring forward applications on rural exception sites.
- [Housing Development Strategy](#) – The Council has formed a Task and Finish Group to develop a Housing Development Strategy which builds on the previous Housing Issues Task and Finish Group's work. The new Strategy will aim to increase the levels of housing development to meet the needs of Rother's residents. The strategy will sit alongside and complement the aims of the Local Plan. The strategy is currently in the process of being adopted by the Council and is expected to complete in Summer 2025. A full public and stakeholder consultation was undertaken. The themes, objectives and actions of the strategy have been created following thorough work from the Task and Finish Group. The themes of the strategy are:

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<sup>7</sup> <http://www.rother.gov.uk/dasa>

<sup>8</sup> <http://www.rother.gov.uk/rotherdistrictlocalplan2006>

<sup>9</sup> <http://www.rother.gov.uk/neighbourhoodplans>

1. “*A thriving local development sector*”. This theme is around the Council taking an active role to create a thriving development programme, delivering more homes for our current and future residents, supporting those delivering housing as well as delivering homes ourselves.
2. “*Supporting our communities*”. This theme is around the Council enhancing the quality of our residents’ lives through the increased provision of affordable housing and by empowering our communities through engagement and collaborative working.
3. “*An active role in the development of new homes*”. This theme is around the Council playing an active role in seeing the change in pace of delivery it wants to see. We will directly intervene in the housing market, bringing sites forward as well as actively lobbying for funding and support (locally, nationally and regionally) to deliver new homes.

Once adopted the Council will seek to effectively resource delivery of the Strategy and regularly monitor its progress.

## **Approach and methodology**

- 1.13 The Action Plan has been prepared in line with the Government’s Housing Delivery Test guidance (last updated 12 December 2024) and informed by work the Council has been undertaking on housing delivery. The Council undertakes housing monitoring on a regular basis. In addition to reporting on delivery through the annual Authority Monitoring Report (AMR), annual updates of the housing land supply position are also published. Through this regular monitoring the Council identified that there were challenges to the delivery of housing in the district with permitted developments slow to start on site and then, subsequently, being built out. However, despite engaging with the promoters and developers of these sites, there were no consistent reasons for the delays in delivery experienced.
- 1.14 A Housing Issues Task and Finish Group (HIT&FG) was set up by the Council’s Overview and Scrutiny Committee in November 2017 to gain a better understanding of what barriers might be acting to deter or delay housing delivery in the district, as well as affordable and social housing delivery and land supply issues. It made its recommendations in 2018. The findings of this work helped inform the development of the Council’s original Housing Delivery Test Action Plan (published 2019) and subsequent iterations.

- 1.15 As referenced above, the Council established a new Housing Development Strategy Task & Finish Group (HDS T&FG) in September 2023 to inform the shape and direction of the Council's new Housing Development Strategy (HDS) and action plan. The draft Housing Development Strategy was published for consultation in early 2025 and seeks to increase the levels of housing development to meet the needs of Rother's residents.

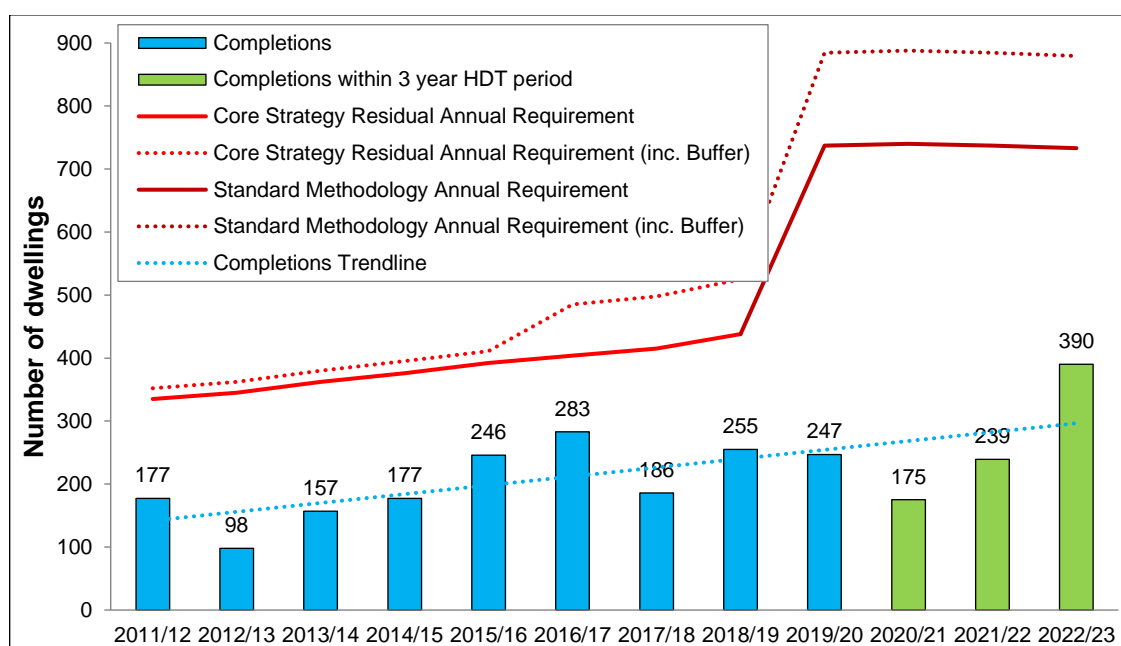
## 2 Housing Delivery Analysis

### Housing supply needs and delivery

#### Dwelling Completions

- 2.1 Since the start of the Core Strategy plan period in April 2011, there have been 2,630 net additional dwellings completed as of 1 April 2023. This was an average of 219 dwellings per year.
- 2.2 In terms of performance against the Core Strategy housing requirement, there have been 1,394 fewer dwellings completed than the Core Strategy annualised requirement of 4,023 dwellings for this point in the Plan period (April 2023).

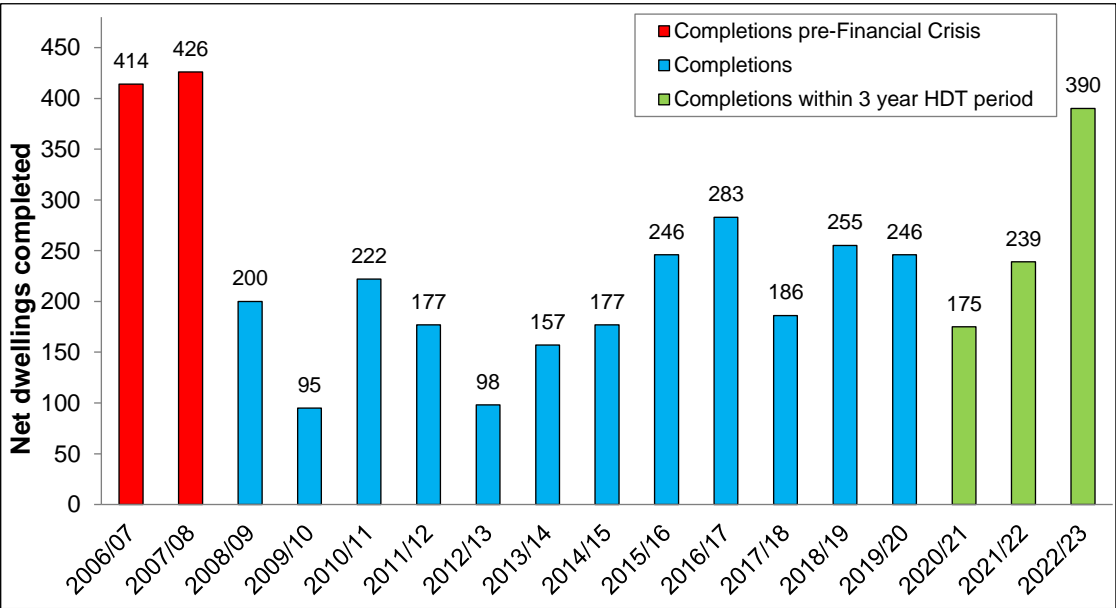
Figure 2: Net dwelling completions and annual requirements (2011/12 – 2022/23)



- 2.3 The Core Strategy annual housing requirement of 335 was not achieved in any year during the plan period prior to 2022/23. Figure 2 shows a slight upward trend in the number of dwellings being completed each year. However, persistent under-delivery means that this trend has not been able to close the gap on the annual residual requirement. In addition, in accordance with the NPPF, the annual requirement was subject to an increased buffer, from 5% to 20% (brought forward from later in the Plan period), between 2015 and 2016.

- 2.4 Furthermore, as the Core Strategy became more than five years old in 2019, the standard method for assessing housing need<sup>10</sup> should be applied. For Rother, this means that the annual average housing requirement increased from 335 dwellings (as set out in the Core Strategy) to 733 dwellings per annum as of 1 April 2023<sup>11</sup>, as set out in the standard method calculation. This was the reason for the steep increase in the annual housing requirement from 2018/19 to 2019/20 shown in Figure 2.
- 2.5 Figure 3 indicates that prior to 2008, housing completions were much higher, with both 2006/07 and 2007/08 each yielding over 400 homes. The substantial shortfall for the current plan period demonstrates that market confidence may not have properly recovered from the financial crisis of the late 2000's. However, as also shown in Figure 3, completions in the most recent financial year reported on (2022-23) have been significantly higher than the previous 10+ years, although more recent data indicates that this was not the start of a new upward trend, as completions in 2023-24 (outside the current reporting time), dropped significantly again to 168.

Figure 3: Net dwelling completions (2006/07 - 2022/23)



<sup>10</sup> <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

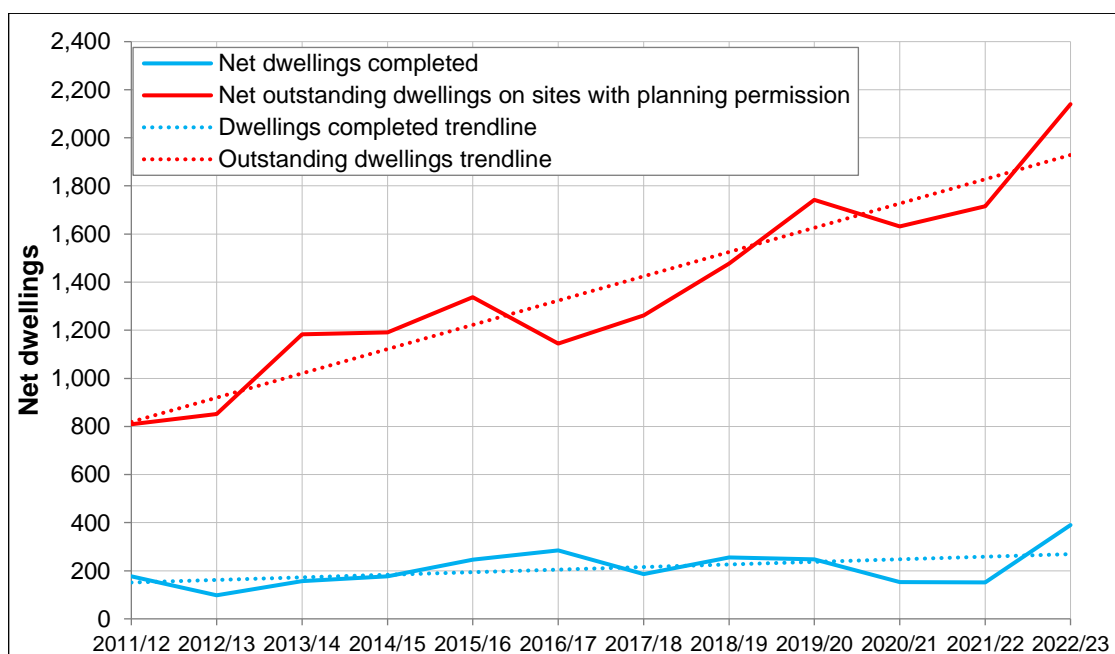
<sup>11</sup> It should be noted that this is not the housing target for the district but the local housing need, as set out in the standard methodology. It should also be noted that the LHN figures were updated in December 2024 although this is outside the current reporting period.



## Planning Permissions

- 2.6 As of April 2023, the number of outstanding dwellings on large sites (6 or more net dwellings) with planning permission was 2,140. In addition, there were a further 442 outstanding dwellings on small sites (less than 6 net dwellings) with planning permission, making a total of 2,582 outstanding dwellings with planning permission (or with delegated approval subject to completion of a Section 106 agreement).
- 2.7 The completion rate, however, has not been significantly impacted by the marked increase in the number of dwellings on sites with planning permission. Excluding the site at Worsham Farm, Bexhill<sup>12</sup>, Figure 4 shows that while the number of dwellings on sites with planning permission had steadily increased, the rate at which dwellings have been completed has remained relatively even. This suggests that the number of sites that have planning permission is not necessarily the main driver in the number of dwellings that are delivered year-on-year. In fact, there are significant issues with sites being developed in a timely fashion and this is expanded on in more detail from paragraph 2.13 onwards.

Figure 4: Comparison of outstanding dwellings on sites with planning permission (excluding Worsham Farm) and number of dwellings completed (2011/12 - 2022/23)

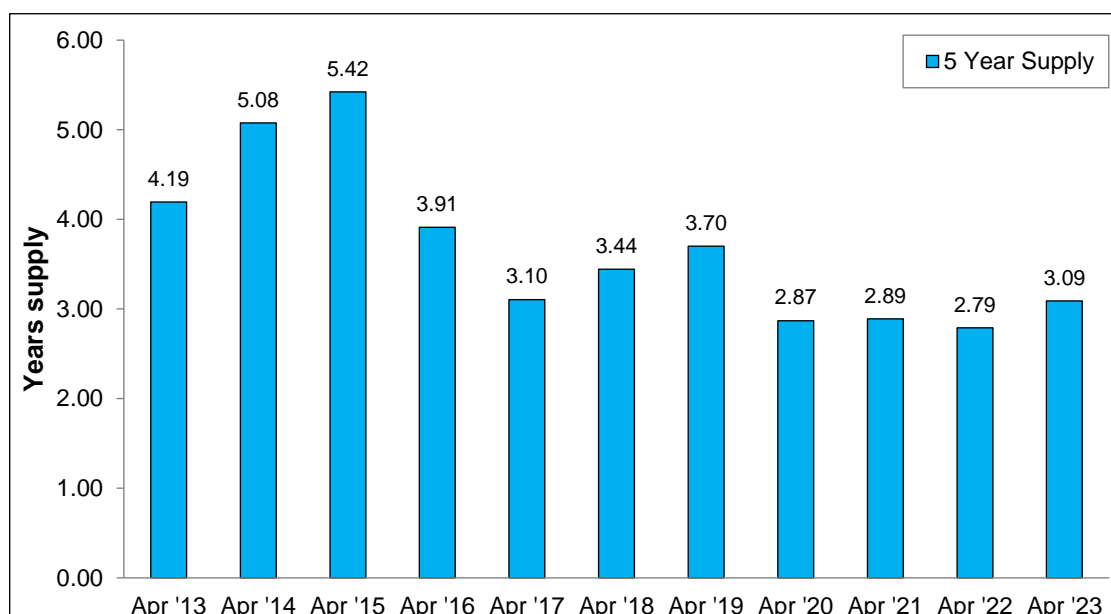


<sup>12</sup> Permitted March 2016 for 1,050 dwellings (planning reference RR/2015/1760/P)

## Five-year Supply

- 2.8 As shown in Figure 5, a consequence of the under delivery is that the Council has been unable to maintain a five-year housing land supply position since April 2015.

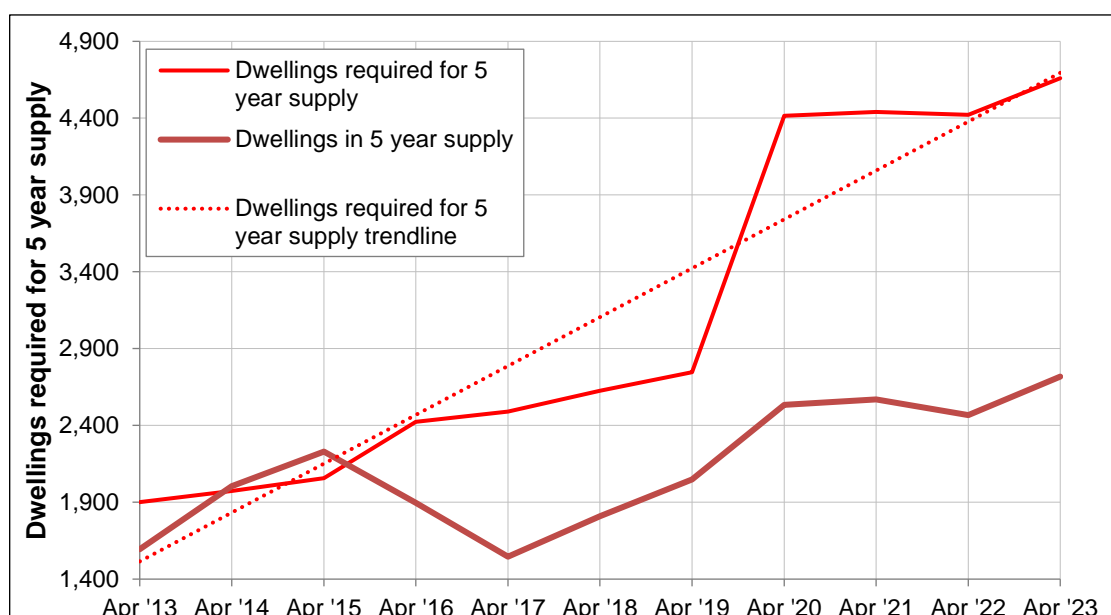
Figure 5: Five-year supply (April 2013 - April 2023)



- 2.9 The drop in supply to below three years seen at April 2020 and continued through to April 2022 was because the Core Strategy became more than five years old in September 2019 and, consequently, the district's five-year supply is now measured against the Local Housing Need figure, as defined by the Government's standard method calculation. This will continue to be how the Council's five-year supply is measured until a new housing requirement figure is established and adopted through the new Local Plan.
- 2.10 The switch to measuring the five-year supply against the Local Housing Need figure means that the number of dwellings required for a five-year supply in April 2023 was 4,398. This is significantly more than the 2,747 dwellings required for a five-year supply in April 2019 (an increase of 1,651 dwellings or 60%), and over 131% more than the 1,901 dwellings required in 2013.

- 2.11 Whilst this report covers the period up to April 2023, it should be noted that the Council's current five-year supply figure, as of April 2024, is 2.63 years<sup>13</sup>. The next figure, as of April 2025, will be confirmed in the annual Housing Land Supply position statement later in 2025.
- 2.12 Figure 6 shows how the number of dwellings required to be deliverable within five years has increased since 2013, along with how the number of dwellings in the five-year supply has changed.

Figure 6: Comparison of number of dwellings within, and the number of dwellings which are required to be in, the five-year supply (April 2013 – April 2023)



## Local housing market and development activity

- 2.13 As referred to earlier, the number of dwellings subject to outstanding planning permissions is high. An analysis of planning permissions was undertaken initially in 2018 to try and establish if there are any commonalities which might point to barriers to sites coming forward in a timely manner or have an impact on build out rates. This involved qualitative analysis of all allocated housing sites and large sites with planning permission to determine the reasons for delays in site commencement, taking account, where relevant, of information from landowners and developers.

<sup>13</sup> The Standard Method for calculating the Local Housing Need figure changed in December 2024 which resulted in an increased figure for which the Council's Housing Land Supply is measured against.

2.14 Notable reasons for the delay in sites being developed are discussed below.

### **Infrastructure – Roads**

2.15 The 2018 analysis showed that a significant factor in the slippage of some of the larger sites was due to delays in the construction of the roads necessary to support them.

- Worsham Farm, 1,050 dwellings - Part of 2006 Local Plan allocation BX2 in north-east Bexhill. Delivery was dependent on the completion of the Bexhill to Hastings Link Road, which opened in 2015. Outline planning permission was granted in April 2016 and the Reserved Matters for Phase 1 (200 dwellings) was approved in November 2017. Bovis Homes (now Vistry) commenced the development of Phase 1 in March 2019 and as of April 2023, two thirds of the dwellings in Phase 1 had completed construction. The other phases have been submitted for Reserved Matters approval, with some now approved and commenced, but this post-dates April 2023.
- Blackfriars, 220 dwellings - 2006 Local Plan allocation BT2 in Battle, now allocated through Policy HD2 of the Battle Neighbourhood Plan. Delivery of the site is dependent on the construction of a new spine road. Outline planning permission was granted in December 2020, and the Reserved Matters application was approved in April 2021.
- Blackfriars (updated position) – As of June 2025, major infrastructure and enabling works on the main parcel included in the housing allocation has been completed. This includes a new road connecting Harrier Lane (north entrance) to The Spinney (south entrance) and drainage works. The site has been delivered by the Council with funding from Homes England via the Housing Infrastructure Fund (HIF). The land has now been sold to the Rother DC Housing Company to deliver the housing. Planning permission for the new housing scheme (RR/2023/1487/P) was approved 14 March 25 and construction of the homes by Greymoor underway, with first completions expected during March 2026 and the last homes expected to complete September 2027. 65% of the new homes will be delivered as affordable housing, which exceeds the minimum 30% requirement in the adopted Local Plan.

### **Landowner Expectations**

2.16 The most common reason for slippage of site delivery in 2018 was found to be land-banking by landowners to achieve their expectations on value. This was

identified as a major factor in around half of sites (of 6 or more net dwellings) analysed. This issue was exacerbated by a significant proportion of sites being in multiple land ownership, meaning that there was a high degree of complexity to site assembly for developers to bring these sites forward.

- 2.17 Unrealistic landowner expectations were found to affect medium sized sites of around 50 dwellings. Given that 83% of Rother sits within the High Weald National Landscape, a designated Area of Outstanding Natural Beauty (AONB), these ‘medium’ sized sites have an important role to play in the district’s housing delivery. Of the 1,562 dwellings allocated in the DaSA, 541 were allocated on sites of 50 dwellings or less.

### **Lack of suitable Council owned land**

- 2.18 In comparison with other Councils, RDC does not own a significant proportion of land that can be used for housing. Where the Council does own land with housing potential, it is seeking to bring those sites forward and is actively pursuing the use of two of its sites to deliver Community Led affordable housing for local people. These sites are progressing towards delivery with one having planning consent for an affordable housing scheme and the other receiving pre-application advice currently. The council is also reviewing other land options to enable housing delivery.
- 2.19 It should be noted that the Council has now formed a local housing company, Rother DC Housing Company (RDCHC) which will allow it to take on a more proactive approach in acquiring land and bringing sites forward for development, including reviewing stalled sites and exploring opportunities to accelerate their delivery. Currently RDCHC is delivering its first major housing scheme on a former Council owned site (Blackfriars – see paragraph 2.15 above).

## **Demand side issues**

### **The Letwin Review**

- 2.20 As well as considering research undertaken at the local level it is also important to note the findings of the national [Independent Review of Build Out Rates](https://www.gov.uk/government/publications/independent-review-of-build-out-final-report)<sup>14</sup> published by Rt Hon Sir Oliver Letwin (October 2018). This work explored the issue of build out rates of fully permitted homes on the largest

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<sup>14</sup> <https://www.gov.uk/government/publications/independent-review-of-build-out-final-report>

sites in areas of high housing demand. It found that the homogeneity of the types and tenures of the homes on offer on these sites, and the limits on the rate at which the market will absorb such products, are fundamental drivers of the slow rate of build out.

- 2.21 Therefore, it is important to consider opportunities for encouraging diversification of housing types to increase build out rates. This is an important consideration for the housing market across the Country.

**Affordability ratio**

- 2.22 The rural nature of Rother, as well as the somewhat limited transport connectivity, means that workplace-based earnings are generally lower than other areas in the region. In contrast, average house prices are generally higher. Consequently, Rother has a particularly challenging affordability ratio, as shown in the table below. This may give weight to a local application of the absorption rate argument offered by the Letwin Review, insofar as the market for new housing is not as strong because it is comparatively difficult for residents to obtain a mortgage.

Table 2: Median and lower quartile workplace-based affordability ratios (2023)

Geography	Median	Lower quartile
England	8.40	7.16
South East	10.54	10.69
East Sussex	11.62	10.59
Hastings	10.99	8.60
Rother	12.41	10.67

- 2.23 Figures 7 and 8 below show how the median and lower quartile workplace-based affordability ratios have increased since 2011. The graphs show a drop in 2022 compared to 2021, and it should be noted that the median workplace-based affordability ratio has now decreased again (2024) although the affordability ratios remain high.

Figure 1: Median workplace-based affordability ratios (2011 - 2023)

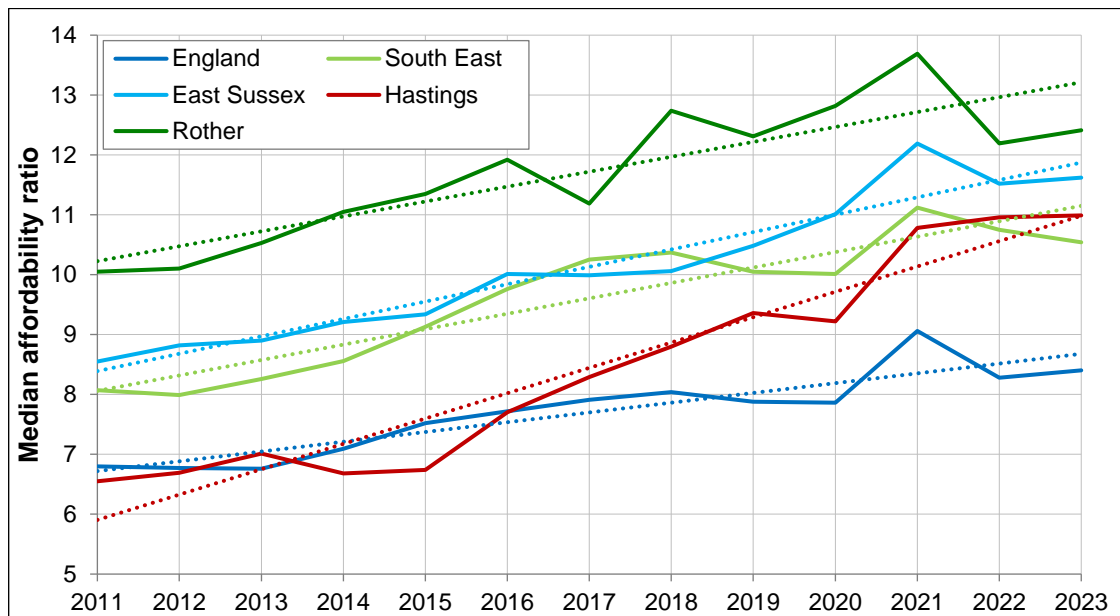
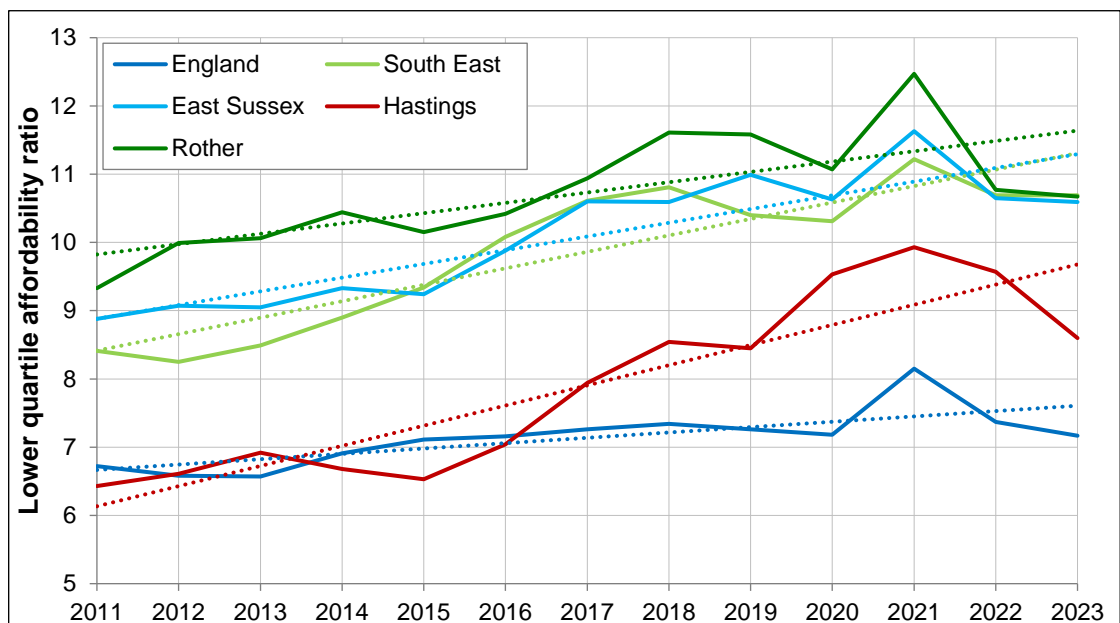


Figure 2: Lower quartile workplace-based affordability ratios (2011 - 2023)



## Summary

- 2.24 Two themes predominate the local analysis - infrastructure and landowner expectations. In terms of the larger strategic sites, complications around the delivery of infrastructure, specifically roads and wastewater capacity, have been a significant factor.

- 2.25 Although the absorption rate problem is a very important factor of build out rates nationwide, consideration of Rother's permissioned or allocated housing sites give a somewhat different conclusion to the outcomes of the Letwin Review analysis. Where the problem of land-banking is assessed to be a function of volume housebuilders, our evidence of 2018 sees land-banking to feature more often as an action of landowners themselves. This is likely because most approved sites in Rother are of a more 'medium size' and therefore constitute a different typology from those typically employed by the volume housebuilders.
- 2.26 As discussed earlier, Rother's larger sites (Worsham Farm, Blackfriars, etc.) have so far seen slippage primarily due to infrastructure delays, particularly the Bexhill Hastings Link Road in relation to Worsham Farm. Now that these sites have commenced, it remains to be seen whether this central conclusion of the Letwin Review will become a feature of build-out rates in Rother.



## **Impacts of COVID-19 on housing delivery**

- 2.27 The COVID-19 pandemic had a significant impact on housing delivery in Rother over 2020/21 with housing completions being approximately half of what was forecast in the 2020 Housing Land Supply position statement. Most of the shortfall from what was expected was on the large sites at Worsham Farm (Bexhill), Barnhorn Green (Bexhill), Preston Hall Farm (Bexhill) and Tollgates (Battle). These sites have now either been completed or partly built out and therefore the figures will have been included in subsequent Housing Land Supply calculations.
- 2.28 It is clear from communications with housebuilders that their ability to develop sites was affected by the reduction in construction capacity, particularly during the first lockdown.
- 2.29 The pandemic had a noticeable impact on the 2020 HDT measurement due to the reduction in construction capacity, which was only slightly offset by the one-month reduction applied to the 2019/20 monitoring year by the Government. The 2021 measurement has been less impacted; however, the Government applied a four-month reduction to the 2020/21 monitoring year to account for the continued disruption to the sector.
- 2.30 Despite this however, because of the significantly increased annual housing requirement from April 2020 onwards, the Council's HDT result has continued to decline.

### 3 Responses and Key Actions

- 3.1 As set out above, boosting housing delivery is a critical issue and Rother District Council, like many other local authorities across the country, continues to experience challenges in fully meeting its local housing needs. The root causes of and solutions to the national housing crisis are multifaceted and complex. Whilst the Council acknowledges it has an important role to play, achieving a significant increase in housing will invariably require coordination and action amongst a wide range of stakeholders. However, there remain challenges given the limited or gaps in in-house expertise, together with the significant scale of housing enabling and development resource and external funding required to help bring sites forward. Furthermore, there are limited tools available to the Council, acting in its capacity as local planning authority, to make meaningful interventions on matters where these lie outside the planning system or the scope of its control.
- 3.2 Nevertheless, this section sets out a range of measures the Council, and particularly its Planning Service, has and will take to help improve performance in housing delivery locally. These actions are set in the context of the challenging financial situation that Rother, like many other local authorities, is facing to meet its minimum statutory requirements whilst taking proactive measures to respond to the needs of local communities.
- 3.3 Further information is set out in the section below and this is also amalgamated into the table in Appendix 1.

#### Previous Actions

Previous Actions	Implement the Housing Issues Task and Finish Group recommendations.
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- 3.4 As previously noted, a **Housing Issues Task and Finish Group (HIT&FG)** was set up by the Council's Overview and Scrutiny Committee in November 2017 to review issues around housing delivery.
- 3.5 The HIT&FG recommended the following actions to promote a sufficient and continuous housing land supply:

- a. Giving priority to completing the Development and Site Allocations Plan and the production of Neighbourhood Plans, taking account of revised National Planning Policy Framework.
- b. An early review of the Local Plan (Core Strategy) be prioritised, taking account of revised National Planning Policy Framework especially given Government's likely expectation for substantially more housing.
- c. Consideration be given to amending exception site planning policy to allow for an element of market housing to cross subsidise where viability is an issue, taking account of revised National Planning Policy Framework.
- d. Identification of more "small site" development opportunities, including for custom and self-build housing, possibly working with smaller developers within a public/private partnership.
- e. 'Unblocking' of sites where physical infrastructure and/or ownership factors present a major constraint to development including by:
  - working to find strategic drainage, utilities and digital broadband solutions to support major developments, working with utility companies and respective developers;
  - seeking financial support from Homes England and other Central Government growth funds;
  - working proactively to bring forward development on sites where the Council has a landholding interest;
  - proactively negotiating with developers and landowners to bring forward key development sites; and
  - consideration, as a last resort, of pursuing Compulsory Purchase Orders, being mindful of local sensitivities.
- f. Continuing to invest in strategically important infrastructure projects that boost the market attractiveness of places where growth is planned, potentially including, for example, the development of GP surgeries.
- g. Promoting higher water efficiency standards through the Local Plan as well as exploring the opportunity of introducing 'recycled water' within planning applications, subject to consistency with national requirements and viability considerations.
- h. Introduce and deliver a Landowners Forum, to take place once every two years, to encourage communication and promote housing development.

- i. Prepare a housing delivery “Action Plan” in response to the new Housing Delivery Test and taking full account of the above, considering revised National Planning Policy Framework.

3.6 As explained further below, many of these actions have been completed or are in progress.

## Current Actions

<b>Key Action 1</b>	<b>Establish a Housing Development Strategy Task &amp; Finish Group and prepare a Housing Development Strategy.</b>
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3.7 The Housing Development Strategy is in its final stages of adoption and is due to be adopted by the council in July 2025.

3.8 The creation of a specific Housing Development Strategy came from the Task and Finish Group that was formed in September 2023 and a subsequent housing development event that was held in January 2024. Through the housing development event the council sought to hear from developers, landowners, agents and consultants together with councillors, council officers and representatives from town and parish councils. At the event we heard about many of the challenges that the Housing Development Strategy is subsequently looking to address. It is planned to hold a follow-up event in Autumn 2025 to demonstrate the progress that the council has made in responding to the challenges to housing delivery that have been identified.

3.9 The themes and objectives for the Housing Development Strategy are set out below:

### *Theme 1: A thriving local development sector*

- Objective 1: Create a positive environment for development of new homes across the district
- Objective 2: Improve the number of sites being built out
- Objective 3: Support local SMEs to ensure a thriving local development market
- Objective 4: Maximise on site delivery of affordable homes across the district

- Objective 5: Be an active lobbyist to ensure the best outcomes for the district and our residents
- Objective 6: Support rural housing delivery
- Objective 7: Support increased density in suitable urban and suburban locations.

### *Theme 2: Supporting our communities*

- Objective 1: Involve communities in development decision making
- Objective 2: Improve opportunities for residents to get on the housing ladder
- Objective 3: Improve understanding of social housing in the community
- Objective 4: Provide town and parish councils with support in delivering new homes
- Objective 5: Support community led housing schemes
- Objective 6: Maintain skills to local to support the delivery of new homes
- Objective 7: Review specialist housing options.

### *Theme 3: An active role in the development of new homes*

- Objective 1: Take an active role in bringing forward new sites
- Objective 2: Explore Options to deliver new Council owned affordable housing
- Objective 3: Attract grant funding to support and enable more homes
- Objective 4: Use s106 receipts and off-site contributions to increase the supply of affordable housing
- Objective 5: Review opportunities for the development of a new garden village in the district
- Objective 6: Proactive approach to infrastructure development.

- 3.10 The aims and objectives of the Housing Development Strategy Task and Finish Group were to create a suitable Housing Development Strategy and recommend it for adoption by the council. As these aims and objectives have been fulfilled in line with the terms of reference of the group the Housing Development Strategy Task and Finish Group will be disbanded.
- 3.11 Delivery of the aims of the aims, themes, objectives and actions of the strategy will require suitable resourcing by the council. The extent of this resource is currently being determined.

- 3.12 There will be ongoing monitoring and performance management of the strategy through annual reports. Other oversight tools will be utilised where deemed to be effective and necessary.

<b>Key Action 2</b>	<b>Monitor and review the delivery of housing developments, including anticipated timescales for delivery of consented and allocated sites.</b>
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- 3.13 As reflected in Section 2 of this report, the Planning Service actively reviews the delivery of housing development in the district through a range of monitoring activities. The regular monitoring of development relates to this, and several other actions set out in the Action Plan.
- 3.14 The Council prepares and publishes an **Authority Monitoring Report (AMR)** annually. This sets out progress on implementation of the statutory Development Plan (including the Local Plan) along with other supporting information. The AMR normally includes an updated five-year housing land supply position, and the Council also publishes a **Housing Land Supply Position** statement annually. The AMR is informed by a housing completions survey. The survey assesses progress on consented and allocated development sites primarily through desk-based research and is useful for identifying where sites are not being delivered to anticipated timescales.
- 3.15 The Council has two **statutory registers** which it maintains. The Brownfield Land Register provides publicly available information on brownfield land that is suitable for housing. The Self-Build and Custom-Build Housing Register assists the Council in understanding demand for self and custom build locally so that it can plan positively to accommodate this.

<b>Key Action 3</b>	<b>Ensure the timely determination of planning applications through an efficient and proactive planning service.</b>
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- 3.16 When planning applications are determined in a timely manner, this can help to ensure a healthy land supply and enable appropriate new development to come forward expediently. However, as set out in Section 2, the granting of planning consent does not necessarily guarantee housing delivery. There are a number of unimplemented planning permissions across the district (which has in turn impacted the Housing Delivery Test score). Nevertheless, the Council can play a key role in facilitating housing delivery through an efficient and proactive approach to development management.

- 3.17 In seeking to work positively with landowners, developers and agents, the Council offers a **Pre-Application Advice Service**. The Council has and will continue to encourage those interested in developing new homes to use the service, particularly for major developments and other complex schemes. The Council's planning webpages provide further information to assist applicants, including our **Major Schemes and Pre-Application Advice Note**. Frontloading at the start of the development process can address key planning issues early on and help to ensure efficiency in decision-making, through the submission of high-quality applications that clearly demonstrate how they will meet local policy requirements. Applicants are also encouraged to seek pre-application advice from other relevant organisations, such as the Highway Authority or the Environment Agency
- 3.18 The Council also facilitates and encourages applications for major and complex schemes to enter into **Planning Performance Agreements (PPAs)**, which are supported under the NPPF, paragraph 47. A PPA is a framework in which parties come together to agree how they are going to take a development proposal through the planning process. PPAs are voluntary agreements whose purpose is to deliver high quality sustainable development that is based on a clear vision and development objectives, to an agreed project plan and work programme in a constructive, collaborative and open manner.

<b>Key Action 4</b>	<b>Prepare a new local plan to set an up-to-date strategic framework to meet local housing needs whilst securing sustainable development.</b>
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### **Development and Site Allocations (DaSA) Local Plan (adopted 2019)**

- 3.19 In response to the recommendations of the HIT&FG (2018), the adopted DaSA contains policies that put into action several of the recommendations which are described in the report, including an updated policy on rural exception sites (DHG2) which allows for a modest amount of open market housing to cross-fund the affordable housing in accordance with the NPPF, new policies on water efficiency and self and custom build housing and the allocation of a number of smaller sites for new housing (15% of dwellings allocated are on sites of less than one hectare).

### **New Local Plan**



- 3.20 The NPPF sets out that Local Plans should be reviewed every five years to consider whether updates are required in response to changing local circumstances and national planning policy, including local housing need requirements set therein. The current Core Strategy was adopted in September 2014 and covers the period 2011 to 2028. With only 3 years remaining in the plan period, it is necessary to undertake a Local Plan Review to ensure planning policies remain current and to maintain an up-to-date Local Plan with a sufficiently forward-looking timescale. Furthermore, there is an opportunity to review and where appropriate update policies in the DaSA Local Plan. This includes a review of the effectiveness of extant site allocation policies, particularly those where development has not been consented or completed.
- 3.21 The Council has prepared and published a **Local Development Scheme** (LDS), which sets out its commitment to prepare a new Local Plan. The latest version of the LDS was adopted on 3<sup>rd</sup> March 2025 and sets out the current timeframes for completing the required stages to be able to adopt the Local Plan. The new Local Plan will cover the period 2020-2040. The revised Local Plan timetable has been set having regard to the Government's proposals for planning reform and meeting the deadline for local authorities to submit plans for examination by December 2026, in order that they will be assessed against the current planning system. A new regime for plan-making is due to come into force under provisions of the Levelling Up and Regeneration Act (LURA) 2023.
- 3.22 The Council undertook a 12-week public consultation on a **draft (Regulation 18) Local Plan 2020-20240** ("draft Local Plan") which ran from 30<sup>th</sup> April to 23<sup>rd</sup> July 2024. Within the draft version of the Local Plan, the Development Strategy proposes an increase in the number of dwellings completed per year compared to historic completions rates. In addition, the draft Local Plan seeks to support sites coming forward containing 100% Affordable Housing to try and promote Affordable Housing to meet the needs of Rother. Another proposed policy to increase the supply of dwellings is to allow, in very limited circumstances, small scale forms of infill development in areas outside of development boundaries where new dwellings would otherwise not be supported. These policies, and all others in the draft Local Plan, may be subject to change following the consultation and any other evidence that comes forward in the intervening time before the Local Plan is submitted to the Secretary of State for examination.



- 3.23 Notably, following the public consultation on the draft Local Plan the Government published the revised NPPF in December 2024 along with selected updates to its companion planning guidance. The revised NPPF has significant implications for the preparation of the new Local Plan. Changes to provisions around housing delivery and Local Housing Need (LHN) mean that the Council must now seek to meet a requirement of 932 new housing units per year. This is a significant increase on the previous LHN requirement for Rother of 732 units per year. This is particularly significant in the context of the adopted Core Strategy requirement of 335 units per year and the comparatively low delivery rates experienced since its adoption. The Council's updated LDS (March 2025) responds to these changes in the NPPF by providing for an **additional Regulation 18 stage consultation**, which will be focussed on identifying additional development capacity through site allocations, particularly for housing. Accordingly, the Council will be seeking to identify land to accommodate housing numbers over and above those set out in the consultation draft Local Plan. The Council has undertaken a **Call for Sites** exercise, which has remained open during the preparation of the Local Plan. The Call for Sites will be re-publicised to help raise awareness of this exercise, and any additional submissions will be considered during the preparation of the new plan.
- 3.24 The Council has also prepared an **Engagement and Duty to Cooperate Statement** to support the plan process. Internal engagement with Members and a series of Duty to Cooperate meetings and discussions on strategic planning issues with neighbouring planning authorities and other statutory and non-statutory organisations have taken place and these will continue until the draft Local Plan is submitted for examination by December 2026.
- 3.25 Through the draft Local Plan, the Council is looking to deliver a spatial development strategy that provides an appropriate and sustainable level of housing delivery balanced sensitively against its environmental constraints, and as such, evidence base documents have been prepared to comprehensively assess opportunities across the whole District. Such key evidence base documents include:
- A joint **Housing and Economic Development Needs Assessment (HEDNA)** (2024) with Hastings Borough Council which assesses future housing needs, the scale of future economic growth and the quantity of land and floorspace required for economic development. Two key issues for the HEDNA are the widening affordability gap between local incomes and

house prices and Homes England's current policy direction, which is encouraging Registered Providers to develop wholly affordable housing sites.

- A **Settlement Review** (2024) which serves as a starting point to ascertain an up-to-date position of the current role and function played by various settlements in the District. It also provides an overview of their existing level of sustainability as well as the physical and environmental constraints that may affect potential settlement capacity.
- A **Housing and Economic Land Availability Assessment (HELAA)**, which will identify a future supply of land in the district which is suitable, available and achievable for housing and economic development. The "Call for Sites" commenced in October 2020 and remains open. A draft version of the HELAA (2024) has been published with the Regulation 18 Consultation and the process of assessing sites will continue towards the next focused consultation on proposed site allocations in early 2026.
- A **Windfall Assessment** which will provide justification for the likely contribution that windfall sites can make to the district's housing supply over the course of the new plan period. A draft windfall assessment (2024) forms part of the draft HELAA, published with the Regulation 18 consultation.
- A **Strategic Flood Risk Assessment (SFRA)** which will inform the Sustainability Appraisal of the new Local Plan and will provide the basis from which to apply the Sequential Test and Exception Test in the development allocation and development control process. There are two levels of SFRA. The Level 1 Assessment identifies whether necessary development can be accommodated outside of high and medium flood risk areas. The Level 2 Assessment is carried out where a Level 1 Assessment shows that all the necessary development cannot be accommodated outside of flood risk areas and will consider the detailed characteristics of flooding in an area. The Rother District Level 1 SFRA (2021) has been published, however, the report has yet to consider potential locations for development to inform the new Local Plan. This will be provided as an addendum to the SFRA when it is available, at which point it will also be determined whether a Level 2 Assessment is necessary. The Level 1 SFRA is likely to require updating to take account of the revised NPPF (2024), changes to national planning policy guidance, and new baseline information on flood risk.

- 3.26 The full list of evidence base documents to support the Regulation 18 Local Plan can be found on the Council's [Supporting Evidence Base](#) page<sup>15</sup>. These documents may be reviewed and updated as the Local Plan progresses.

<b>Key Action 5</b>	<b>Establish a Local Authority Owned Housing Company to deliver new homes for local communities.</b>
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- 3.27 Addressing the shortage of housing in Rother is one of the Council's biggest priorities and the formation of a Council owned local housing company shows a real commitment to building and improving homes across the district.
- 3.28 It will allow the Council to take on a more proactive approach in acquiring land and bringing sites forward for development, securing high-quality, sustainable and affordable homes for its residents. As such, it was decided at Full Council in December 2019 to proceed with the establishment of the local housing company. **Rother DC Housing Company Ltd** (formally Alliance Homes (Rother) Ltd) was incorporated in October 2020.
- 3.29 The Rother DC Housing Company 2022-2025 Business Plan is under review this year and a range of proposals are being considered for future provision.
- 3.30 The company will actively seek every opportunity to ensure that additional affordable homes can be delivered by working with traditional and 'for profit' registered providers who can draw down central government funding.
- 3.31 The ambition of the housing company is not to directly compete with other house builders where the market is likely to deliver but to bring additionality to the market by addressing areas with specific delivery issues. The company will also seek to support the local construction sector through its approach to procurement and the implementation of local skills plans.
- 3.32 Sites already owned by the Council with planning potential, as well as sites being acquired as part of other council led projects, will be the primary focus of the early years' development.

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<sup>15</sup> <https://www.rother.gov.uk/planning-and-building-control/planning-policy/emerging-local-plan/emerging-evidence-base/>

**Key Action  
6**

**Ensure an effective Community Infrastructure Levy (CIL) and Section 106 (including planning obligations) regime to ensure timely delivery of infrastructure alongside new housing.**

- 3.33 To ensure the delivery of sustainable development it is vital that there is adequate infrastructure in place to support local areas and communities. Indeed, infrastructure is often necessary to facilitate and support new housing development and is crucial to accommodate the levels of growth planned over the long-term. The Planning Service plays a key role in helping to identify infrastructure needs and secure funding to enable the timely delivery of infrastructure.
- 3.34 As part of the Local Plan process, the Council has prepared an **Infrastructure Delivery Plan (IDP)** to identify the infrastructure required to support growth and housing development in the district. The IDP forms part of the evidence base and has been prepared through engagement with key stakeholders and delivery partners, including infrastructure and service providers. It is a 'living' document and subject to periodic review to ensure it is kept up to date. A draft IDP was prepared to support the recent draft Local Plan consultation, and this will continue to be reviewed and updated as work on the plan progresses.
- 3.35 To help fund and deliver infrastructure, the Council negotiates **Section 106 agreements** (S106) and other planning contributions on a case-by-case basis through the development management process. The Council also charges a **Community Infrastructure Levy (CIL)** on qualifying development. A CIL Charging Schedule has been in place in Rother since April 2016, and this will be subject to a future review in accordance with the LDS.
- 3.36 To effectively allocate strategic CIL monies to projects, the Council has established the **Strategic Community Infrastructure Levy Allocations Panel**. The Panel is comprised of Councillors and is supported by officers. The purpose of the Panel is to consider which projects should be invited to make funding applications; to consider submitted applications; and to allocate strategic CIL funding, subject to Chief Executive approval via Delegated Authority.
- 3.37 The Council prepares and publishes an **Infrastructure Funding Statement (IFS)** annually, in line with Regulation 121A of the Community Infrastructure Levy (England) Regulations. This sets out information on CIL and S106

receipts and spending and provides a useful monitoring tool to ensure that growth is appropriately supported throughout the district.

<b>Key Action</b> <b>7</b>	<b>Maintain and augment partnership working with key stakeholders to help facilitate and coordinate the delivery of new homes.</b>
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- 3.38 The Council carries out a wide range of consultation and engagement activities to support the delivery of its corporate priorities. In terms of the Planning Service, the Council has prepared a **Statement of Community Involvement** (SCI), the latest version of which was adopted on 31<sup>st</sup> January 2022. This is a statutory document which sets out how and when the Council will engage with stakeholders and the wider community to ensure that everyone can participate in the planning process. This includes both the preparation of policy documents and the determination of planning applications. The SCI also sets out how and when the Council will support local communities, including Parish Councils, in preparing **Neighbourhood Plans**, which can supplement the Local Plan with policies to manage and enable housing development.
- 3.39 As part of the Local Plan process the Council carries out informal and formal public consultations. The Planning Service maintains a consultation database of individuals and organisations who have registered an interest in the Local Plan. This includes landowners, agents and developers and helps to ensure these groups are notified of plan progress and consultation opportunities.
- 3.40 The Council also has a statutory **Duty to Cooperate** with prescribed bodies on strategic planning matters. This includes neighbouring authorities, East Sussex County Council and government bodies such as the Environment Agency, Natural England and Historic England. The Council has prepared several Statements of Common Ground with these types of bodies, which it will update as work on the plan progresses. It will also prepare and publish a Duty to Cooperate Statement to set out how it has engaged positively and constructively in fulfilling the duty.
- 3.41 Rother's draft Housing Development Strategy also sets out a number of objectives and actions which are underpinned by the need to maintain and build partnerships and collaborative working to address local housing needs. This includes delivery of new homes through the housing company partnership established by the RDCHC.

<b>Key Action 8</b>	<b>Review 2024 Housing Delivery Test Results.</b>
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- 3.42 The Council will review the Government's latest release of the Housing Delivery Test results and where required, it will be review and update this Housing Delivery Test Action Plan.
- 3.43 The Key Actions and the steps necessary to achieving them are set out in the table at **Appendix 1**.

## Appendix 1: Table of Key Actions

### Action 1: Establish a Housing Development Strategy Task & Finish Group and prepare a Housing Development Strategy

Action Plan Steps to be taken to achieve the Key Actions	Timescale Immediate (<3 months) Short (3-6 months) Medium (6-12 months) Long (>12 months)	Status	Project Lead
Terms of Reference approved by OSC	N/A	Complete, Sept 2023	Democratic Services
HDS T&FG Members invited to join and inaugural meeting	N/A	Complete, Sept/Oct 2023	Democratic Services
Public consultation on the Draft Housing Development Strategy	N/A	Complete, consultation 7 <sup>th</sup> Feb – 31 Mar 2025	Housing Enabling
Adoption of the Housing Development Strategy	Short term	Underway	Housing Enabling
Monitor delivery of the Housing Development Strategy	Long term	Pending	Housing Enabling

### Action 2: Monitor and review the delivery of housing developments, including anticipated timescales for delivery of consented and allocated sites

Action Plan Steps to be taken to achieve the Key Actions	Timescale Immediate (<3 months) Short (3-6 months) Medium (6-12 months) Long (>12 months)	Status	Project Lead
Prepare an Authority Monitoring Report and include an updated five-year housing land supply position	Medium-term	AMR published annually	Planning Service (Planning Policy and Placemaking)
Complete housing starts and completions survey to inform AMR and other monitoring activities	Medium-term	Ongoing, carried out annually	Planning Service (Planning Policy and Placemaking)

Maintain registers - Brownfield Land Register, Self-Build and Custom Housebuilding Register	Medium-term	Registers reviewed annually	Planning Service (Planning Policy and Placemaking)
Engage with landowners/developers to understand issues to delivery on strategic or major sites, particularly those which are consented and/or allocated in the Development and Site Allocations Local Plan	Medium-term	Ongoing	Planning Service (Planning Policy and Placemaking)

### Action 3: Ensure timely determination of planning applications through an efficient and proactive Planning Service

Action Plan Steps to be taken to achieve the Key Actions	Timescale Immediate (<3 months) Short (3-6 months) Medium (6-12 months) Long (>12 months)	Status	Project Lead
Encourage developers to use the Council's Pre-Application Advice Service	Immediate	Ongoing	Planning Service (Development Management)
Use Planning Performance Agreements (PPAs)	Immediate	Ongoing	Planning Service (Development Management)
Ensure the Planning Service is adequately resourced to effectively manage caseloads	Immediate	Ongoing	Planning Service (Development Management)
Meet Government performance metrics for validating and processing planning applications	Immediate	Ongoing	Planning Service (Development Management)
Encourage Planning Officers to undertake continual professional training and development	Immediate	Ongoing	Planning Service (Development Management)



**Action 4: Prepare new Local Plan to set an up-to-date strategic framework to meet local housing needs whilst securing sustainable development.**

<b>Action Plan</b> Steps to be taken to achieve the Key Actions	<b>Timescale</b> Immediate (<3 months) Short (3-6 months) Medium (6-12 months) Long (>12 months)	<b>Status</b>	<b>Project Lead</b>
Review and publish an updated Local Development Scheme	As and when required	Complete, LDS adopted Mar 2025	Planning Service (Planning Policy and Placemaking)
Early production including preparation of the evidence base and stakeholder engagement, including production of a new/updated Housing and Economic Land Availability Assessment	Immediate	Ongoing	Planning Service (Planning Policy and Placemaking)
Undertake a Call for Sites exercise to identify land that is suitable and available for development	Immediate	Ongoing	Planning Service (Planning Policy and Placemaking)
1 <sup>st</sup> Regulation 18 stage public consultation	N/A	Complete	Planning Service (Planning Policy and Placemaking)
2 <sup>nd</sup> Regulation 18 stage public consultation on site allocations	Medium-term, expected Q4 2025-26	Pending	Planning Service (Planning Policy and Placemaking)
Regulation 19 stage public consultation on Proposed Submission Local Plan	Medium-term, expected Q2 2026-27	Pending	Planning Service (Planning Policy and Placemaking)
Submission of Local Plan to Secretary of State for Examination in Public	Long-term, by Dec 2026	Pending	Planning Service (Planning Policy and Placemaking)
Adoption of Local Plan	Long-term, expected Q3 2027-28	Pending	Planning Service (Planning Policy and Placemaking)

### Action 5: Establish a Local Authority Owned Housing Company to deliver new homes for local communities

Action Plan Steps to be taken to achieve the Key Actions	Timescale Immediate (<3 months) Short (3-6 months) Medium (6-12 months) Long (>12 months)	Status	Project Lead
Incorporation of Rother District Council Housing Company Ltd	N/A	Complete, Oct 2020	Housing
Deliver new housing through housing company	Long-term	Ongoing	Housing/Corporate Development Team

### Action 6: Ensure an effective Community Infrastructure Levy (CIL) and S106 regime to ensure timely delivery of infrastructure alongside new housing

Action Plan Steps to be taken to achieve the Key Actions	Timescale Immediate (<3 months) Short (3-6 months) Medium (6-12 months) Long (>12 months)	Status	Project Lead
Monitor and intermittently update the Infrastructure Delivery Plan	Short-term	Ongoing	Planning Service (Planning Policy and Placemaking)
Monitor intake and use of CIL and S106 funds via the Infrastructure Funding Statement	Medium-term	Ongoing, carried out annually	Planning Service (Planning Policy and Placemaking)
Use Rother's Strategic Community Infrastructure Levy Panel to determine the allocation of CIL funding	Medium-term	Ongoing	Planning Service (Planning Policy and Placemaking)
Review, prepare and adopt updated CIL Charging Schedule	Long-term, expected Q4 2027-28	Not started	Planning Service (Planning Policy and Placemaking)

## Action 7: Maintain and augment partnership working with key stakeholders to help facilitate and coordinate the delivery of new homes

Action Plan Steps to be taken to achieve the Key Actions	Timescale Immediate (<3 months) Short (3-6 months) Medium (6-12 months) Long (>12 months)	Status	Project Lead
Engage with key stakeholders and delivery partners, both within and outside the Rother District Council, including neighbouring authorities, East Sussex County Council, Parish Councils, government bodies, infrastructure providers, community and special interest groups, and the public.	Immediate	Ongoing	Planning Service (Planning Policy and Placemaking)
Review and where appropriate update the Council's Statement of Community Involvement	Long-term, expected Q4 2025/26 – Q1 2026-27	Pending	Planning Service (Planning Policy and Placemaking)
Support Parish Councils on the preparation and review of Neighbourhood Development Plans	Immediate	Ongoing	Planning Service (Planning Policy and Placemaking)
Fulfil the Council's statutory Duty to Cooperate through the Local Plan process, including the preparation of Statements of Common Ground with prescribed bodies	Immediate	Ongoing	Planning Service (Planning Policy and Placemaking)
Hold annual meetings with stakeholders in support of the Housing Development Strategy to progress its aims and objectives. Stakeholders to include relevant officers and members from RDC and other authorities, developers, registered providers, landowners, agents, parish councils, etc.	Medium-term	Ongoing. Meeting 1 took place Jan 2024, Meeting 2 planned for Autumn 2025.	Housing Enabling (for the Housing Development Strategy)

### Action 8: Review 2024 Housing Delivery Test results

Action Plan Steps to be taken to achieve the Key Actions	Timescale Immediate (<3 months) Short (3-6 months) Medium (6-12 months) Long (>12 months)	Status	Project Lead
Review 2024 HDT results and where required, review and update the 2023 HDT Action Plan within 6 months of the publication of results.	Medium-term	Subject to HDT results	Planning Service (Planning Policy and Placemaking)