

HOUSING DELIVERY TEST ACTION PLAN

July 2019



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Contents

1	Introduction	5
	Background.....	5
	Purpose, objectives and status	6
	Relationship to other plans/strategies and council activities.....	7
	Approach and methodology	8
2	Housing Delivery Analysis	9
	Housing supply needs and delivery.....	9
	The new standard method for assessing housing need	12
	Local housing market and development activity	13
	Infrastructure - Roads.....	13
	Infrastructure - Wastewater	14
	Landowner Expectations	14
	Lack of suitable Council owned land	15
	Demand side issues	15
	The Letwin Review	15
	Affordability ratio.....	15
	Summary	16
3	Responses and Key Actions	17
	Housing Issues Task and Finish Group recommendations.....	17
	Policy responses through the DaSA Local Plan.....	18
	Local Plan Review	19
	Proactively investing in infrastructure	20
	Developer engagement	20
	Worsham Farm.....	20
	Preston Hall Farm	21
	Landowners Forum	21
	Summary of Key Actions	21
	Appendix 1: Table of Key Actions	23

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1 Introduction

Background

- 1.1 National Government is committed to the improved delivery of new homes nationally through their economic and housing growth agendas. To this end they have introduced a number of 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. The allocation of land to accommodate some 1,562 new homes, outside of designated Neighbourhood Areas, is being made through the Development and Site Allocations (DaSA) Local Plan. The DaSA is currently at Examination and scheduled for Adoption in autumn 2019. These sites are allocated against an outstanding housing target of 1,574 dwellings up to 2028, of which at least 1,029 should be met through the DaSA and the remaining 545 through Neighbourhood Plans.
- 1.3 Since the submission of the DaSA for Examination there have been three Neighbourhood Plans which have been 'made'. These three Plans have allocated for a combined total of 215. The remaining four Plans still in preparation are expected to allocate for some 435 dwellings.
- 1.4 The Housing Delivery Test (HDT) has been introduced by the Government as a monitoring tool to demonstrate whether LPAs are building enough homes to meet their housing need. The HDT, which was published in November 2018, 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 National Planning Policy Framework (NPPF) sets out that:
 - Where housing delivery over the previous three years has been less than 95% of the housing requirement, LPAs should prepare an Action Plan setting out the causes of under delivery and the intended actions to increase delivery;

- Where delivery has been less than 85% of the housing requirement, a 20% buffer should be applied to the supply of deliverable sites for the purposes of housing delivery assessment;
 - Where delivery has been less than 75% of the housing requirement, the NPPFs presumption in favour of sustainable development will apply.¹
- 1.5 Where an Action Plan is required, this should be prepared within six months of the test results being published.
- 1.6 As the adopted housing requirement in Rother District is currently less than five years old (the Core Strategy was adopted in September 2014), the district's HDT has been assessed against the Core Strategy average annual housing figure of 335 dwellings.
- 1.7 In February 2019 the Government published the first HDT results for the 2018 Measurement. Against a requirement of 1,008 dwellings over the last three years, Rother delivered 697 net dwellings with a result of 69%. Consequently the Council is required to produce this Action Plan, as well as including a 20% buffer in its 5 year housing land supply position statement.

Purpose, objectives and status

- 1.8 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.
- 1.9 The Council recognises that delivering growth is complex. Whilst a number 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 including landowners and house builders.

¹ A three year transitional period will operate from November 2018. In 2018 the threshold will be delivery below 25% of the housing required over the previous three years, rising in 2019 to 45% and then 75% in 2020. For further information see: <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

Relationship to other plans/strategies and council activities

1.10 The 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:

- [Local Plan Core Strategy](#) – Part 1 of the 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.
- [DaSA Local Plan](#) – Part 2 of the Local Plan, the DaSA allocates sites in order to deliver, and give spatial expression to, the housing targets set out in the Core Strategy.
- [Rother District Local Plan 2006](#) - Whilst the Core Strategy and DaSA have largely superseded the policies in the earlier 2006 Rother District Local Plan, there remains a few exceptions; mainly site allocations within designated Neighbourhood Areas where a Neighbourhood Plan is yet to be 'made'.
- [Neighbourhood Plans](#) - There are five 'made' Neighbourhood Plans in the District. These are in the Parishes of Sedlescombe, Salehurst and Robertsbridge, Ticehurst, Rye and Crowhurst. Each of the plans allocates sites in order to be in conformity with the targets of the Core Strategy. In addition, there is the Burwash Neighbourhood Plan which has recently conducted the Regulation 14 pre-submission consultation. Rother also has three other Neighbourhood Plans which are still in preparation for the Neighbourhood Areas of Battle (including Netherfield), Etchingham and Hurst Green.
- [Rother District Council Corporate Plan 2014 - 2021](#) - The Councils Corporate Plan also includes strategic Core Aims themed around housing delivery. This includes the promotion and support of affordable housing, improvements to private housing stock and the prioritisation of the delivery of the Councils major housing allocations.

Approach and methodology

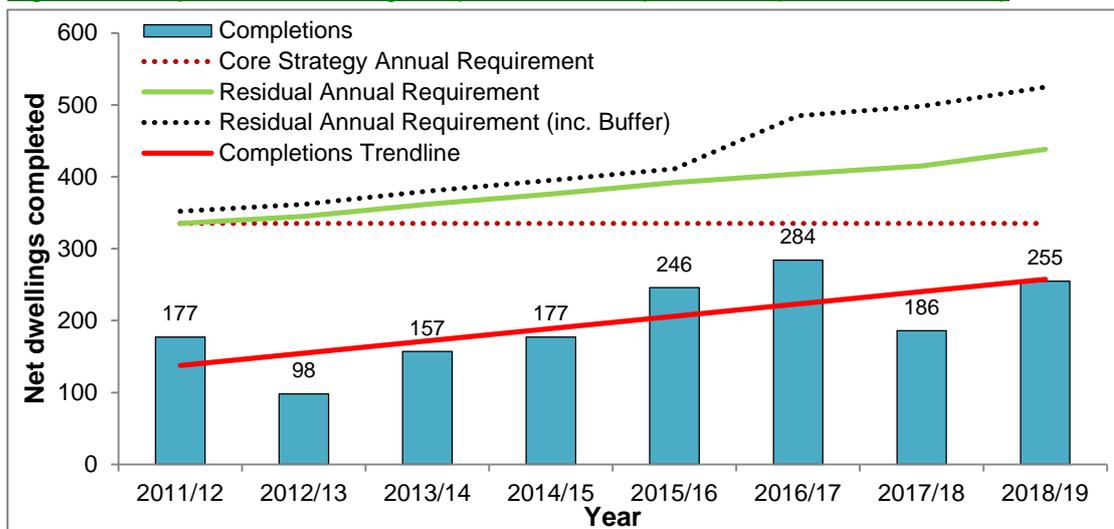
- 1.11 The preparation of this Action Plan has been informed by work the Council has been undertaking on housing delivery. The Council undertakes housing monitoring on a regular basis. In addition to reporting on delivery through the annual Local Plan Monitoring Report (LPMR), half yearly updates of the housing land supply position are also published. Through this regular monitoring the Council have identified that there were challenges to the delivery of housing in the district with consented 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.
- 1.12 A Housing Issues Task and Finish Group (HIT&FG) was set up by the Council's Overview and Scrutiny Committee 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.
- 1.13 The findings of this work have informed the development of this Action Plan.

2 Housing Delivery Analysis

Housing supply needs and delivery

2.1 Since the start of the plan period in April 2011, there have been 1,580 net additional dwellings completed (as at 1 April 2019); an average of only 198 dwellings per year. This is 1,102 dwellings below the Core Strategy annualised requirement of 2,682 dwellings for this point in the Plan period. Over the past three years the average completion rate has been 242 per year.

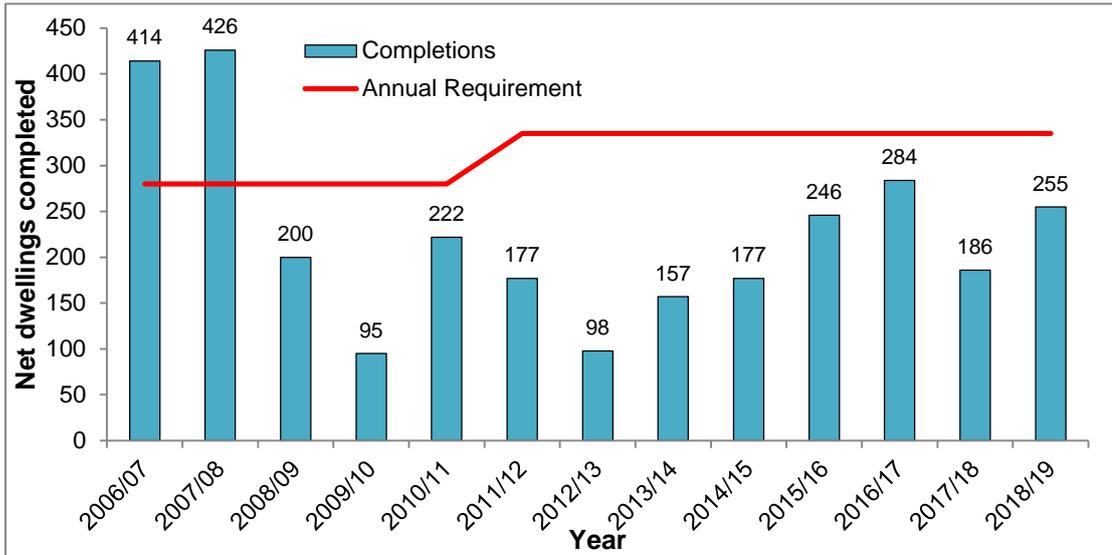
Figure 1: Comparison of dwelling completions and requirements (2011/12 - 2018/19)



2.2 Though there has been a continual under delivery during the plan period, whereby the annualised Core Strategy requirement has not yet been achieved, the trend for delivery has been in a generally upward direction (see Figure 1). Since 2011, annual delivery rates have generally shown an upward trend, with the lowest number recorded in 2012/2013 (98 dwellings) compared to the highest number recorded in 2016/2017 (284 dwellings). However, persistent under delivery means that this trend has not been able to close the gap on the annual residual requirement. In addition, 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.

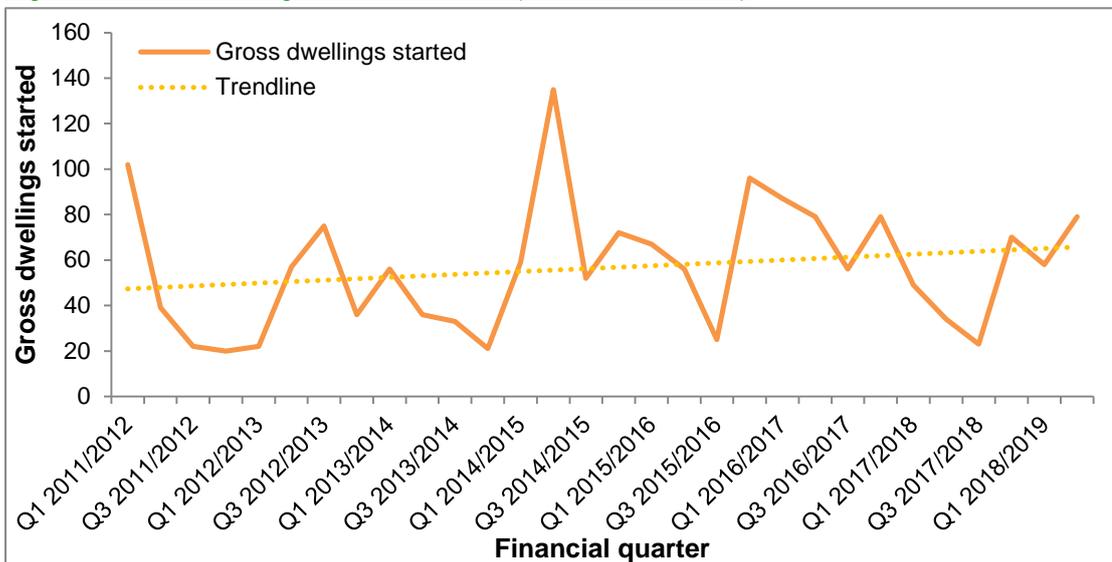
2.3 When housing delivery is viewed over a longer time period it is evident that completion rates tend to reflect the state of the housing market. Figure 2 indicates that prior to 2008, housing completions were much higher, with both 2006/07 and 2007/08 each yielding over 400 homes. The substantial shortfall for the current plan period demonstrates that market confidence may not have properly recovered from the financial crisis of the late 2000's and may more recently have been depressed by Brexit.

Figure 2: Net additional completions (2006/07 - 2018/19)



2.4 The volatility in housing delivery is demonstrated by the number of gross dwellings started each quarter since 2011 (Figure 3). This shows not only the peaks and troughs that have been experienced in the District over the years but that, similar to the upward trend for dwellings completions identified in Figure 1, there is a generally upward trend for the commencement of dwellings.

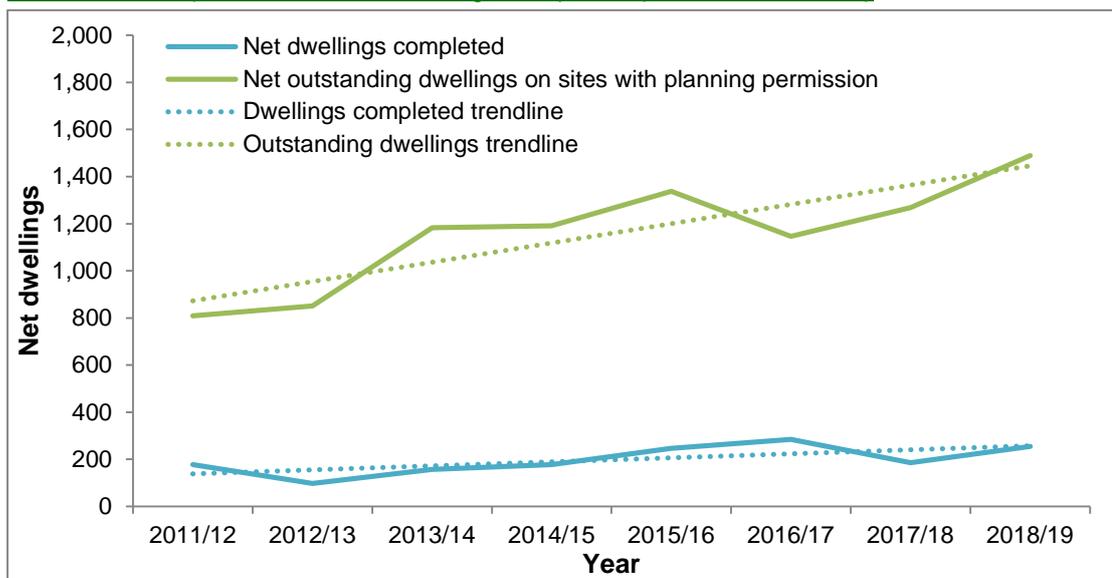
Figure 3: Gross dwelling commencements (2006/07 - 2018/19)



2.5 As of April 2019, the number of outstanding dwellings on large sites (6+ net dwellings) with planning permission is 2,258, which is an increase of some 183% from the April 2011 figure of 798. In addition there are a further 281 net outstanding small site (less than 6 net dwellings) permissions, making a total of 2,539 dwellings with planning permission (or delegated to approve subject to S106).

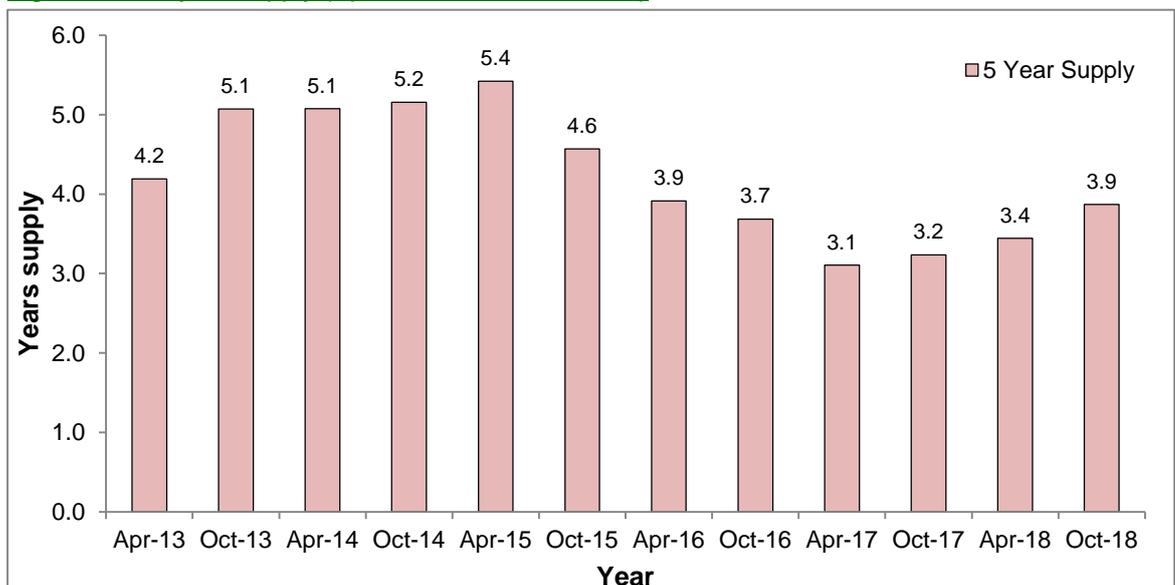
2.6 Rates of completions however, have not been significantly impacted by the marked increase in the number of permitted dwellings. Excluding the site at Worsham Farm, which was approved in March 2016 for 1,050 dwellings, Figure 4 shows that while both the number of permitted dwellings and the number of dwelling completions show a general upward trend, the rate at which dwellings are being completed does not match the increasing rate at which they are being granted planning permission.

Figure 4: Comparison of outstanding dwellings on sites with planning permission (excl. Worsham Farm) and number of dwellings completed (2011/12 - 2018/19)



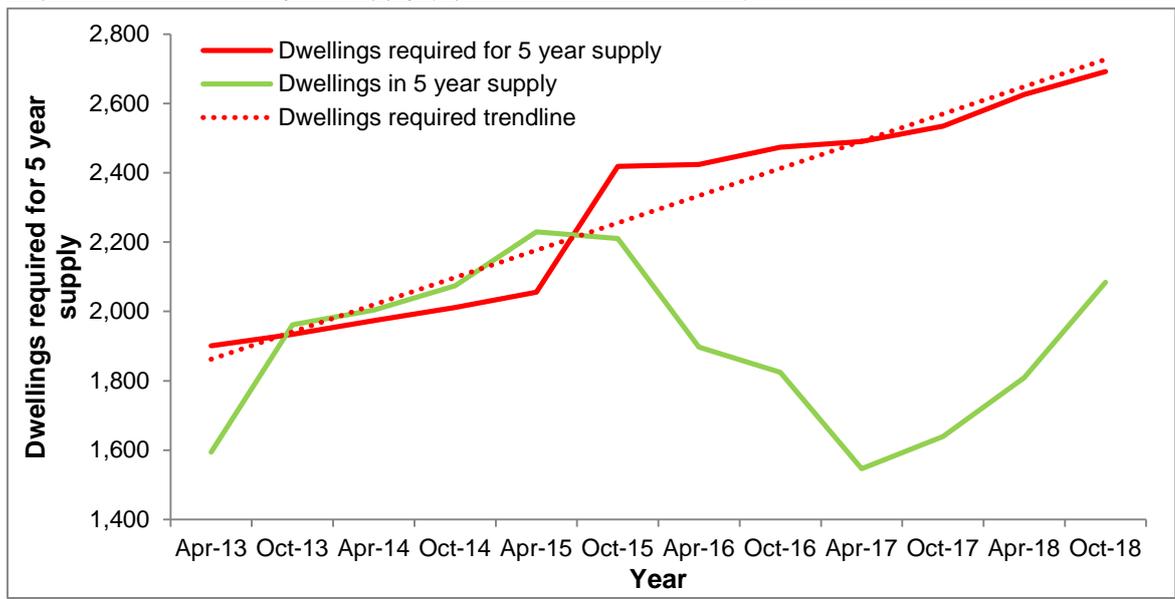
2.7 As shown in Figure 5, a consequence of the under delivery is that the Council has found it difficult to maintain a positive housing land supply position since April 2015.

Figure 5: Five year supply (April 2013 - October 2018)



2.8 Figure 6 shows how the number of dwellings required to be deliverable within 5 years has increased, with a noticeable jump in October 2015 when the 5% buffer was increased to 20%. This contrasts to the number of dwellings actually in the 5 year supply, which shows an equally noticeable slump in October 2015, although this has started to pick up from October 2017.

Figure 6: Comparison of number of dwellings within, and the number of dwellings which are required to be in, the 5 year supply (April 2013 - October 2018)



The new standard method for assessing housing need

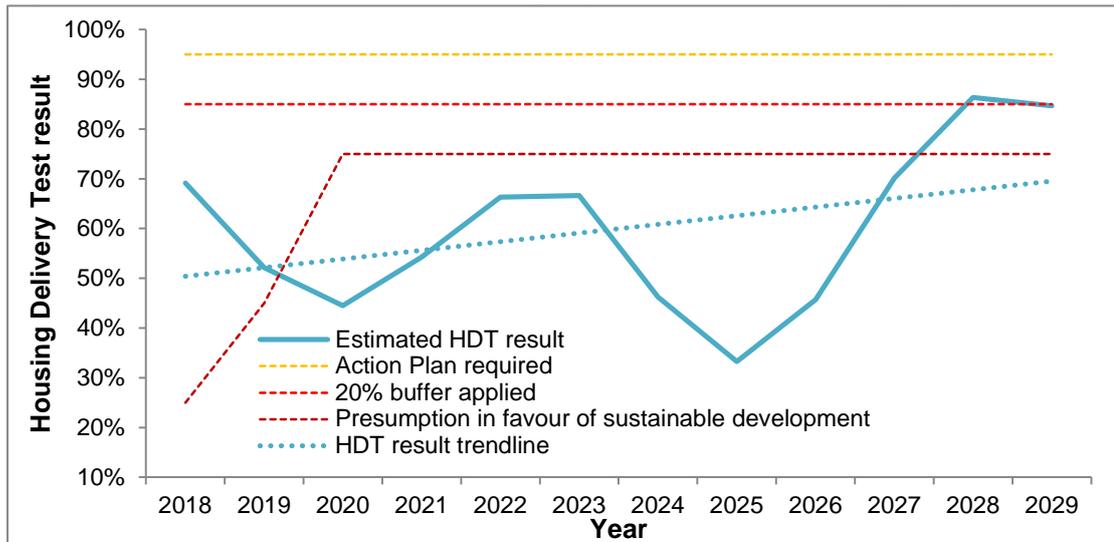
2.9 At the next publication of the HDT in November 2019, the Core Strategy will be more than 5 years old. This means that the new standard method for assessing housing need² should be applied. For Rother, this will mean that the annual average housing requirement will increase from 335 dwellings (as set out in the Core Strategy) to 727 dwellings³ per annum as set out in the standard method calculation.

2.10 On the basis of the housing trajectory published in October 2018, Figure 7 shows that Rother’s HDT results are likely to decline in the immediate future, as the local housing need figure is applied.

² <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

³ 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.

Figure 7: Estimated effect of the new housing requirement on HDT results (2019)



Local housing market and development activity

- 2.11 As referred to earlier, the number of outstanding planning permissions is high. An analysis of these permissions has been undertaken 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.
- 2.12 The Council conducted qualitative analysis of all allocated housing sites and large sites, in order to determine the reasons for delays in site commencement. This has been done in discussion with Development Management officers and, where relevant, information from some landowners and developers.

Infrastructure - Roads

- 2.13 One significant factor in the increase of outstanding permissions since 2011 is the granting of planning permission in April 2016 for some 1,050 dwellings at Worsham Farm in North East Bexhill (some 43% of the total number of outstanding permissions at April 2018). The granting of permission and delivery of this site was dependent upon the construction of the Bexhill to Hastings Link Road (Combe Valley Way) and the Gateway Road (Mount View Street) which was completed in winter 2015. This was also recognised by Inspector conducting the examination of the Core Strategy from 2012 to 2014, as reflected in her Inspectors report and through Core Strategy policies BX3, TR1 and EC2. Prior to this outline application, Worsham Farm was allocated in the 2006 Local Plan for 980 dwellings as part of Policy BX2. It was originally envisaged that the Link Road would be completed in the first half of 2010.

2.14 Beyond the Worsham Farm site, Infrastructure – specifically roads, has been a significant factor in delays to larger sites:

- Preston Hall Farm, 139 dwellings – Part of the 2006 Local Plan BX2 allocation, in North East Bexhill. Delivery was dependent on the completion of the Bexhill to Hastings Link Road. Planning permission was granted in August 2018 and Persimmon Homes commenced the development in March 2019.
- Blackfriars – Allocated in Policy BT2 of the 2006 Local Plan for at least 220 dwellings. Delivery of the site is dependent on the construction of a new spine road. This site is subject to a current outline planning application (RR/2019/604/P), which was submitted to the LPA in March 2019.

Infrastructure - Wastewater

2.15 Wastewater capacity is limited in some areas of Bexhill, requiring upgrading of existing infrastructure and provision of a new wastewater pipe to the north of the town. RDC have been working with Southern Water and other stakeholders to accelerate delivery of this wastewater pipe.

Landowner Expectations

2.16 The most common reason for slippage of site delivery is land-banking by landowners, in order to achieve their expectations on value. This has been identified as a major factor in around half of sites (of 6 or more net dwellings) analysed. This issue is exacerbated by a significant proportion of sites being in multiple land ownership, meaning that there is a high degree of complexity to site assembly for developers to bring these sites forward.

2.17 Unrealistic landowner expectations generally affect medium sized sites of around 50 dwellings. Given that 83% of Rother sits within the High Weald 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 to be allocated in the DaSA, 541 are 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 is suitable for housing. This limits its options to be proactive in the promotion of housing delivery. Although where the Council does own land with housing potential, it will seek to bring sites forward for housing led development, such as with the site at Blackfriars, Battle.

Demand side issues

The Letwin Review

- 2.19 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 published by Rt Hon Sir Oliver Letwin (October 2018)⁴. This work explored the issue of build out rates of fully permitted homes on the largest 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. Therefore, it is important to consider opportunities for encouraging diversification of products to increase build out rates. This is an important consideration for the housing market across the Country.

Affordability ratio

- 2.20 The rural nature of Rother (83% is in the High Weald AONB), 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 local residents to obtain a mortgage.

Figure 8: Median and lower quartile affordability ratios (2018)

Geography	Median	Lower quartile
England	8.00	7.29
South East	9.93	10.51
East Sussex	9.69	10.15
Hastings	9.33	8.53
Rother	10.33	10.91

Source: [East Sussex in Figures](#)

⁴ <https://www.gov.uk/government/publications/independent-review-of-build-out-final-report>

Summary

- 2.21 Two themes predominate the 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.
- 2.22 Although the absorption rate problem is a very important factor of build out rates nationwide, consideration of Rother's permissioned or allocated housing sites gives 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 sees land-banking to feature more often as an action of landowners themselves. This is likely due to the fact that the majority of approved sites in Rother are of a more 'medium size', and therefore constitute a different typology from those typically employed by the volume housebuilders.
- 2.23 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 the Worsham Farm and Preston Hall Farm sites have commenced development under Bovis Homes and Persimmon Homes respectively, it remains to be seen whether or not this central conclusion of the Letwin Review will become a feature of build-out rates in Rother.

3 Responses and Key Actions

Housing Issues Task and Finish Group recommendations

- 3.1 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 of substantially more housing.
 - c. Consideration be given to allowing 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, in light of revised National Planning Policy Framework.

Policy responses through the DaSA Local Plan

3.2 In light of and in response to the HIT&FG, the Proposed Submission DaSA contains policies that put into action a number of the recommendations which are described in their report.

- **DHG2: Rural Exception Sites**

This policy replaces Core Strategy Policy LHN3 and allows for a modest amount of open market housing on such sites, in order to cross-fund the affordable housing.

- **Policy DRM1: Water Efficiency**

As Rother has been identified as an area of ‘serious water stress’, there was a clear need for water efficiency measures to be addressed in planning policy. In relation to this, the Proposed Submission DaSA contains **Policy DRM1: Water Efficiency**, which requires that all new dwellings must meet the higher optional building regulations standard of water consumption, this being: no more than 110 litres of water per person per day. Furthermore, the Rother Local Plan Viability Study⁵ (produced for the DaSA) concluded that the additional development costs are likely to be no more than an additional £50 per unit, and should therefore have no negative impact on viability.

- **Policy FAC2: Land east of Waites Lane, Fairlight Cove**

The HIT&FG identified the capacity of GP surgeries as a frequent public issue, which raises a large amount of objection when new housing is proposed. Responding to this, DaSA allocation FAC2 for 30 dwellings in the village of Fairlight Cove has, as part of the policy, a requirement for a new doctor’s surgery to be included in any proposal coming forward.

⁵ <http://www.rother.gov.uk/CHttpHandler.ashx?id=30772&p=0%20>

- 3.3 While not a DaSA policy, the issue of GP surgeries also relates to the development at Barnhorn Green (RR/2015/3125/P) where the Council has purchased land to bring forward a GP surgery.
- 3.4 Moreover, a general theme of the DaSA's proposed allocations accords with the overall conclusions of the Letwin Review and the HIT&FG Report, in respect of the need to broaden the local housing offer in order to speed up the 'absorption rate' at which new homes can be sold into the market. Coinciding with this analysis, particularly regarding the homogenising overreliance on large site developments, paragraph 68a of the NPPF (2019) requires local planning authorities to "identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare..."
- 3.5 Towards this end, of 1,562 dwellings allocated in the DaSA, 15.2% (237) are on sites of less than one hectare. This does not include site allocations in Neighbourhood Plans, which are generally smaller in size, as well as many of the sites identified through the Brownfield Land Register.
- 3.6 Additionally, the DaSA proposes **Policy DHG6: Self-build and Custom Housebuilding**. This policy requires that sites of 20 dwellings or more should provide for 5-10% of the total number of dwellings to be "made available as serviced plots for self and custom housebuilders".

Local Plan Review

- 3.7 The current Core Strategy looks forward to 2028, with only 9 years remaining from the expected adoption date of the DaSA Local Plan. In order to maintain an up-to-date local plan with a sufficiently forward looking timescale, it will be necessary to undertake this review to ensure policies remain current.
- 3.8 To this end, work is already underway on stakeholder engagement and preparing the evidence base for the review. GL Hearn were recently appointed to undertake a joint Housing and Economic Development Needs Assessment with Hastings Borough Council.
- 3.9 In order to identify capacity for housing and employment sites in the new Local Plan, there will be a need to produce an updated Housing and Economic Land Availability Assessment (HELAA). As part of this process there will be a call for sites, as well as reviews of sites already identified through sources such as the Brownfield Land Register and previous Strategic Housing Land Availability Assessments.

Proactively investing in infrastructure

- 3.10 As discussed earlier in this report, although allocated in the 2006 Local Plan and being partly on Council owned land, Blackfriars (Policy BT2) in Battle has not been able to come forward for development. Funding from the Government's Housing Infrastructure Fund (HIF) has been allocated to help to deliver a spine road to facilitate development of this site, RDC has submitted an outline planning application (in March 2019) for the road, along with a Masterplan for the 220 dwellings that the allocation can provide. This demonstrates that the Council has sought funding for key infrastructure so that this site can come forward.
- 3.11 As well as being a recommendation of the HIT&FG Report, the investment in and construction of new roads has been a very significant feature of the current plan period, and indicates that the RDC is committed to proactively working with East Sussex County Council and other stakeholders. The Bexhill to Hastings Link Road and the Gateway Road, completed in 2015, and the North Bexhill Access Road (NBAR), completed in 2019, have enabled the delivery of 1,289 dwellings in North East Bexhill (Land at Worsham Farm & Preston Hall Farm), as well as new allocations for 530 dwellings in North Bexhill, as part of Policy BEX3 in the emerging DaSA Local Plan. It has also enabled the delivery of the Council's major employment sites at Glovers Farm, Worsham Farm and Buckholt Lane in Bexhill, which will provide some 62,500sqm of employment floorspace when completed.

Developer engagement

Worsham Farm

- 3.12 On 17 April 2019, Rother District Council produced a Statement of Common Ground⁶ with the stakeholders of the Worsham Farm site, these being Trinity College (the remaining landowner) and Bovis Homes (the developer committed to building phase 1).

⁶ <http://www.rother.gov.uk/CHttpHandler.ashx?id=31814&p=0>

- 3.13 Planning permission was granted for 1,050 dwellings in April 2016. The Statement of Common Ground states that there will be 8 phases of development, so that 445 dwellings will be delivered in the next 5 years between 2019 and 2023, and the remaining 605 built out between 2024 and 2028. As of 25 February 2019, the development of phase 1 (200 dwellings) has been commenced. Phase 1 also includes the delivery of infrastructure required to develop the future phases.

Preston Hall Farm

- 3.14 The Council has also produced a Statement of Common Ground⁷ with Persimmon Homes South East, dated 17 April 2019, regarding the Preston Hall Farm Site. Persimmon has agreed that completion of all 139 dwellings can be reasonably expected by 2021/22, as set out in their trajectory.

Landowners Forum

- 3.15 Going forward the LPA will set up a 'Landowners Forum' that meets every two years, as per the recommendations of the HIT&FG report. This action will commence once the DaSA Local Plan has been adopted.

Summary of Key Actions

- 3.16 It is clear that the adoption of the DaSA is of principal importance to the improvement of housing delivery. Not only will it meet several recommendations of the HIT&FG but its site allocations and policies are necessary for the timely delivery of some much needed housing.
- 3.17 Given the Government's expectations to increase housing delivery, progressing the Local Plan Review will be prioritised. In order to identify the capacity for new development, there will be a particular focus on producing an updated HELAA, including a call for sites.
- 3.18 Reviewing this Action Plan with a view to incorporating feedback from further developer and stakeholder engagement is also seen as a high priority, along with the implementation and findings of the Landowners Forum.
- 3.19 These Key Actions and the steps necessary to achieving them are set out in the table at Appendix 1.

⁷ <http://www.rother.gov.uk/CHttpHandler.ashx?id=31815&p=0>

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Appendix 1: Table of Key Actions

Action	Steps	Measure of Success	Timetable	Priority	Status
Adopt the DaSA	Submission of DaSA for Examination	DaSA submitted to Secretary of State for Examination	January 2019	High	Complete
	Conclusion of DaSA Examination Public Hearings	Confirmation from Inspector of Modifications necessary to make the DaSA sound	July 2019	High	Complete
	Drafting of DaSA Modifications incorporating recommendations of the HIT&FG	Approval of DaSA Modifications by Cabinet	July 2019	High	Complete
	Consultation on the Modifications to the Proposed Submission DaSA	Submission of Main Modification consultation representations to the Inspector	July - September 2019	High	In progress
	Conclusion of DaSA Examination	Publication of Inspectors Report	September 2019	High	
	Adoption of the DaSA	DaSA adopted at Full Council	September 2019	High	
Local Plan Review	Stakeholder Engagement and Evidence Gathering	Meeting Local Development Scheme (LDS) milestone	July - October 2019	High	In Progress
	HELAA/Call for sites	Commencement of call for sites	Winter 2019/20	High	
	Draft Plan Consultation	Meeting LDS milestone	December 2019 - January 2020	High	
	Pre-submission Publication Consultation	Meeting LDS milestone	June - July 2020	High	
	Submission	Local Plan Review submitted to Secretary of State for Examination	August 2020	High	
	Examination	Publication of Inspectors Report	October 2020	High	
	Adoption	Local Plan Review adopted at Full Council	January 2021	High	
Action Plan	Review this Action Plan	Publication of 2019 Action Plan	November 2019 - May 2020	Medium	
Land-owners Forum	Set up Landowners Forum	Hold Landowners Forum	Early 2020	High	