



# HOUSING DELIVERY TEST ACTION PLAN

2020 MEASUREMENT



**Rother District Council**  
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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 impending changes proposed in the Queens Speech and Planning White Paper. To this end they 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 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 NPPF's presumption in favour of sustainable development will apply.
- 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 2020 measurement on 19 January 2021 and as such the Council must produce and publish the Action Plan before 19 July 2021.

- 1.5 The 2020 HDT measurement covers the three-year period from 1 April 2017 to 31 March 2020. This Action Plan responds to this 2020 HDT measurement.
- 1.6 The district's HDT has been assessed against the Core Strategy average annual housing figure of 335 dwellings for the first two years of the measurement, as the Core Strategy was adopted in September 2014 and is therefore valid up to September 2019. The third year of the measurement (2019/20) is assessed against a combination of both the Core Strategy annual average requirement and the [Local Housing Need figure](#)<sup>1</sup>. A one month reduction has also been applied to the 2019/20 year by the Government. This reduction has been stated to account for the disruption to local authority planning services and the construction sector caused by COVID-19 pandemic and subsequent national lockdowns.
- 1.7 Against a requirement of 1,035 dwellings over the last three years, Rother delivered 670 net dwellings with a result of 65%. Consequently, the Council is required to publish this Action Plan, including a 20% buffer in its five-year housing land supply position statements and apply the NPPFs presumption in favour of sustainable development. This is a continued position from the previous (2019) HDT result.

## **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 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 including landowners and house builders.

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<sup>1</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.

## Relationship to other plans/strategies and council activities

1.10 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](#) - 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. The New Local Plan will replace the existing Local Plan Core Strategy, DaSA Local Plan and any remaining extant policies from the Rother District Local Plan 2006.
- [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.
- Development and Site Allocations ([DaSA Local Plan](#)) – Part 2 of the 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](#) - 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 Crowhurst, Rye, Salehurst and Robertsbridge, Sedlescombe and Ticehurst. Each of the plans allocates sites to be in conformity with the targets of the Core Strategy. In addition, there are the Burwash and Battle neighbourhood plans which are currently at Examination. The district also has three other neighbourhood plans in preparation for the neighbourhood areas of Etchingham, Hurst Green and Peasmarsch.

- [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. The Councils new Corporate Plan 2020 - 2027 recently underwent public consultation and the final draft of the Plan is nearing adoption.

## **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), annual 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 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.
- 1.13 The findings of this work have informed the development of this Action Plan.

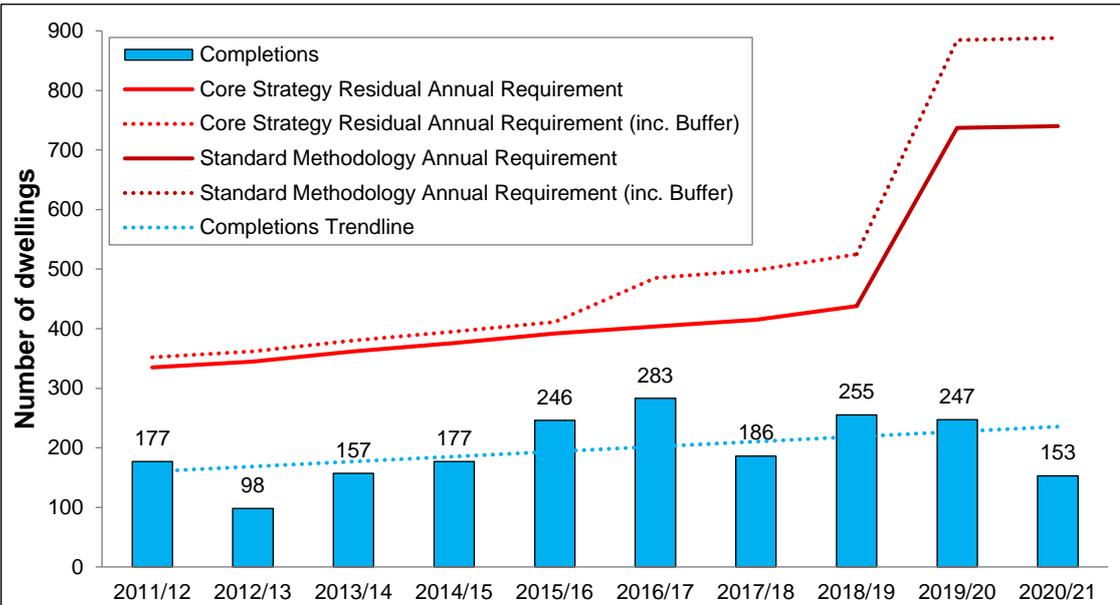
## 2 Housing Delivery Analysis

### Housing supply needs and delivery

#### Dwelling Completions

- 2.1 Since the start of the Core Strategy plan period in April 2011, there have been 1,979 net additional dwellings completed as of 1 April 2021. This is an average of 198 dwellings per year.
- 2.2 In terms of performance against the Core Strategy housing requirement, there have been 1,374 fewer dwellings completed than the Core Strategy annualised requirement of 3,353 dwellings for this point in the Plan period.

Figure 1: Net dwelling completions and annual requirements (2011/12 – 2020/21)

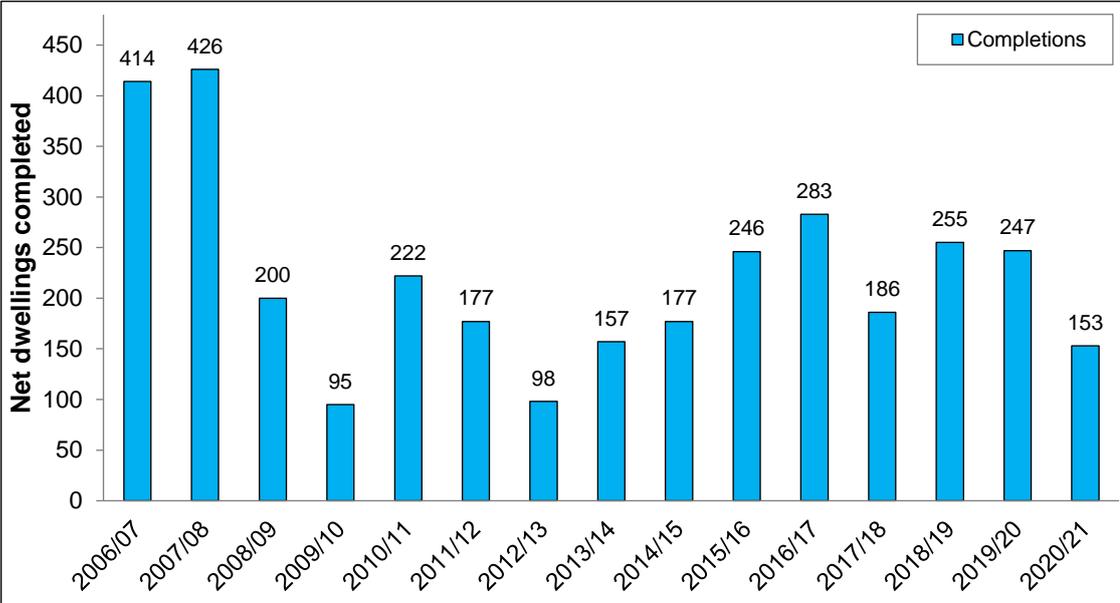


- 2.3 The Core Strategy annual housing requirement of 335 has not yet been achieved at any year during the plan period, though Figure 1 does show a slight upward trend in the number of dwellings being completed each year. However, persistent under delivery means that this trend has not been able to close the gap on the annual residual requirement. In addition, 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>2</sup> should be applied. For Rother, this means that the annual average housing requirement has increased from 335 dwellings (as set out in the Core Strategy) to 737 dwellings per annum as of 1 April 2020 and 740 dwellings<sup>3</sup> per annum as of 1 April 2021, as set out in the standard method calculation. This is the reason for the steep increase in housing requirement from 2018/19 to 2019/20 shown in Figure 1.

2.5 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.

Figure 2: Net dwelling completions (2006/07 - 2020/21)



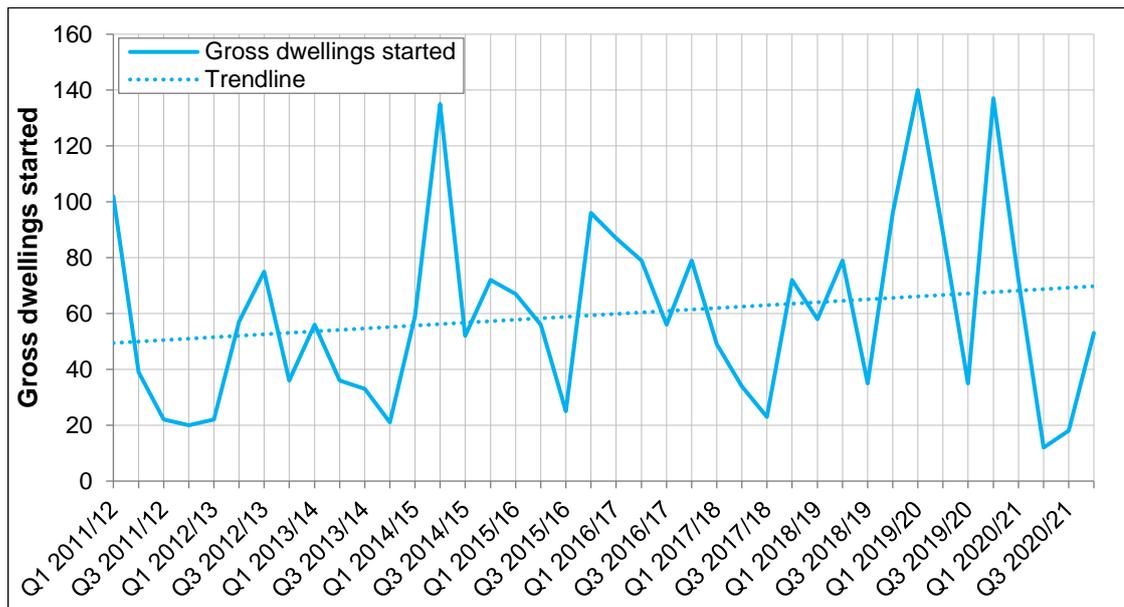
Dwelling Commencements

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

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

<sup>3</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.

Figure 3: Gross dwelling commencements (2006/07 - 2020/21)

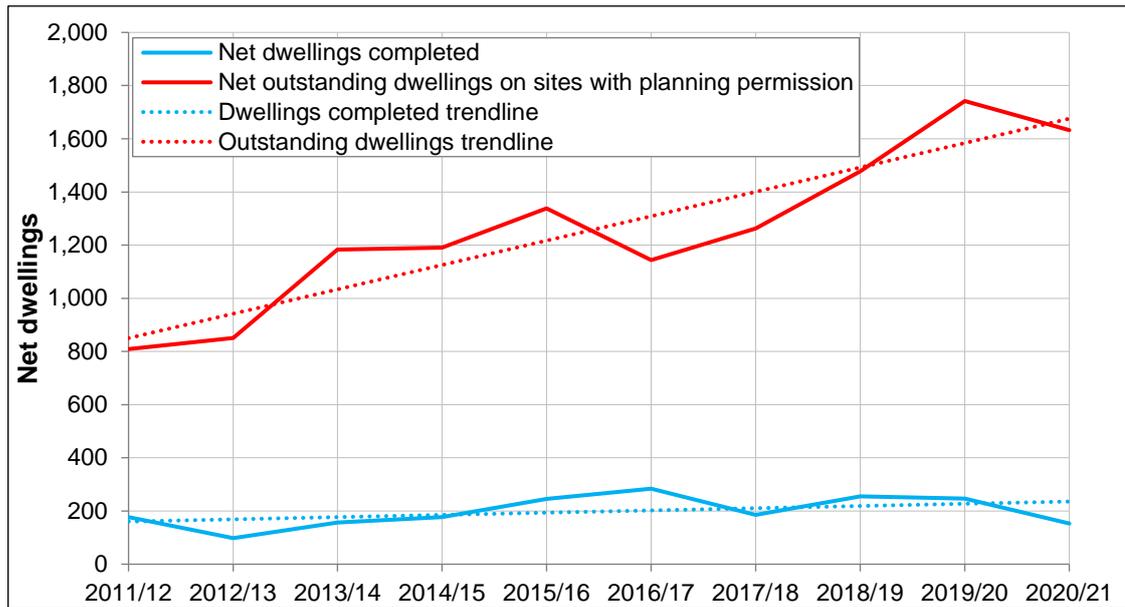


### Planning Permissions

- 2.7 As of April 2021, the number of outstanding dwellings on large sites (6 or more net dwellings) with planning permission is 2,433. In addition, there are a further 249 outstanding dwellings on small sites (less than 6 net dwellings) with planning permission, making a total of 2,682 dwellings with planning permission (or with delegated approval subject to completion of a Section 106 agreement).
- 2.8 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<sup>4</sup>, Figure 4 shows that while both the number of dwellings on sites with planning permission and the number of dwelling completions show an upward trend, the rate at which dwellings are being completed is increasing less than the rate at which they are being granted planning permission. 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.

<sup>4</sup> Permitted March 2016 for 1,050 dwellings

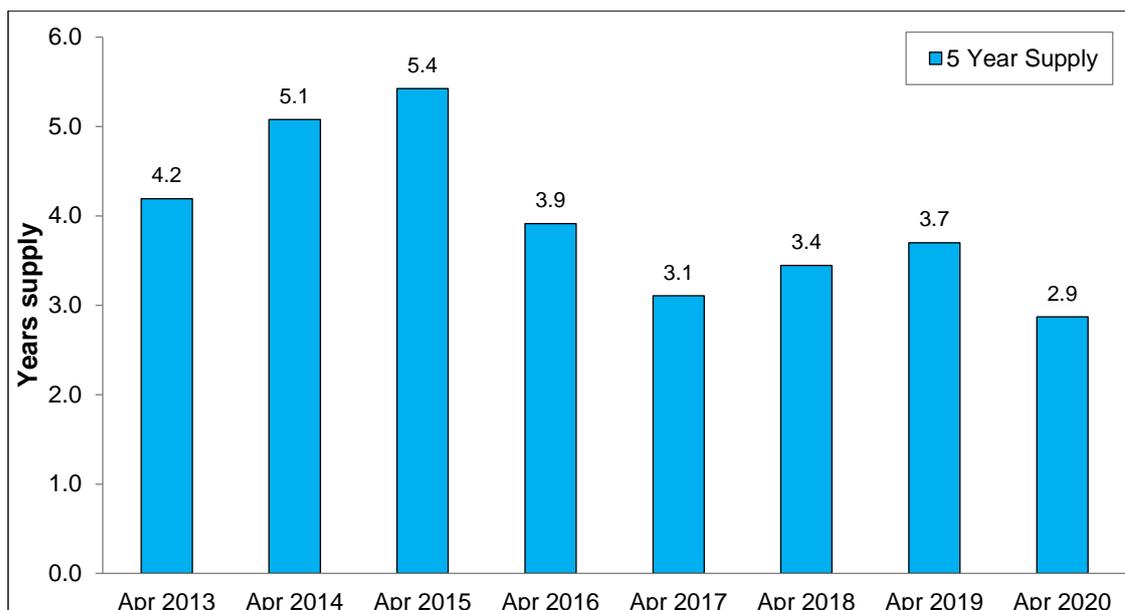
Figure 4: Comparison of outstanding dwellings on sites with planning permission (excl. Worsham Farm) and number of dwellings completed (2011/12 - 2020/21)



### Five-year Supply

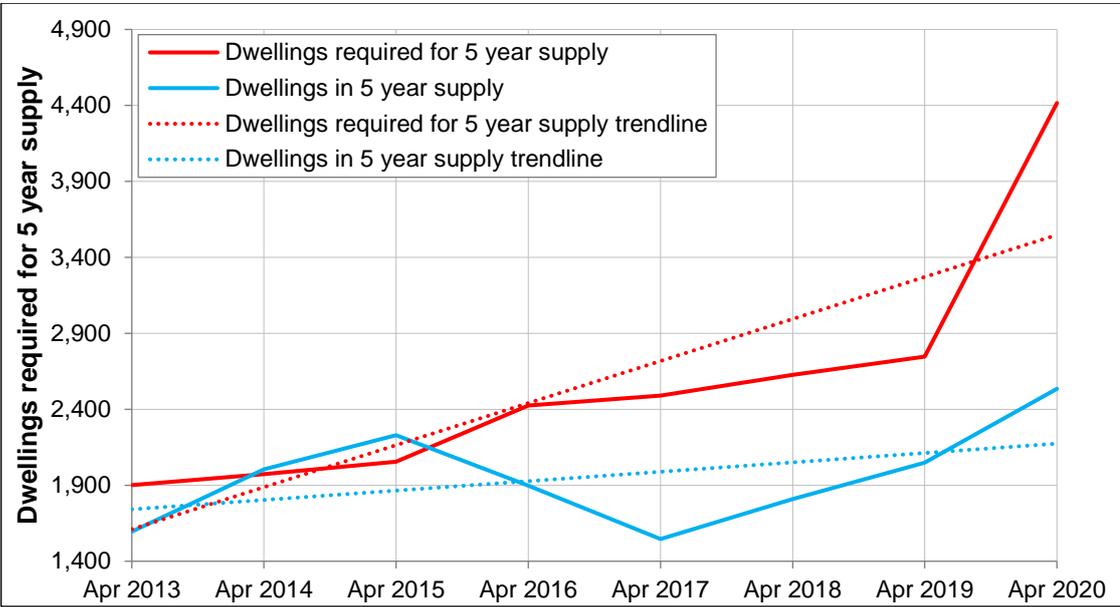
2.9 As shown in Figure 5, a consequence of the under delivery is that the Council has found it difficult to maintain a five-year housing land supply position since April 2015.

Figure 5: Five-year supply (April 2013 - April 2020)



- 2.10 The drop in supply to below three years seen at April 2020 is because the Core Strategy became more than five years old in September 2019 and, consequently, the districts five-year supply is now measured against the Local Housing Need figure, as defined by the 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.
- 2.11 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 2020 was 4,416. This is significantly more than the 2,747 dwellings required for a five-year supply in April 2019, an increase of 1,669 dwellings (61%), and over 132% more than the number of dwellings required in 2013.
- 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 2020)



## Local housing market and development activity

- 2.13 As referred to earlier, the number of outstanding planning permissions is high. An analysis of these 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.
- 2.14 The Council conducted qualitative analysis of all allocated housing sites and large sites to determine the reasons for delays in site commencement. This was done in discussion with Development Management officers and, where relevant, information from landowners and developers.
- 2.15 Notable reasons for the delay in sites being developed are discussed below.
- 2.16 Going forward, the Council's local housing company, Alliance Homes (Rother) Ltd., will review stalled sites and explore opportunities to accelerate their delivery.

### Infrastructure – Roads

- 2.17 A significant factor in the slippage of some of the larger sites is 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. Outline planning permission was granted in April 2016 and Bovis Homes commenced the development in March 2019.
  - Preston Hall Farm, 139 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. Planning permission was granted in August 2018 and Persimmon Homes commenced the development in the first quarter of 2020/21. There has been good progress and the site is expected to be completed this year.
  - Blackfriars, 220 dwellings - 2006 Local Plan allocation BT2 in Battle. 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. Now that the site has Housing Infrastructure Fund (HIF) funding for the construction of the spine road, development is expected to commence in the summer.

### Infrastructure - Wastewater

- 2.18 Wastewater capacity is limited in some areas of Bexhill, requiring upgrading of existing infrastructure to deliver improved wastewater infrastructure, which may include the provision of a new wastewater pipe to the north of the town. Southern Water are presently working on the most appropriate configuration to accommodate further capacity across their network.
- 2.19 RDC have been working with Southern Water and other stakeholders to accelerate delivery of this improved wastewater infrastructure.

### Landowner Expectations

- 2.20 The most common reason for slippage of site delivery is land-banking by landowners 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.
- 2.21 Unrealistic landowner expectations generally affect medium sized sites of around 50 dwellings. Given that 82% 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 allocated in the DaSA, 541 were allocated on sites of 50 dwellings or less.

### Lack of suitable Council owned land

- 2.22 In comparison with other Councils, RDC does not own a significant proportion of land that can be used 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 those sites forward.
- 2.23 It should be noted that the Council has now formed a local housing company, Alliance Homes (Rother) Ltd., which would allow it to take on a more proactive approach in acquiring land and bringing sites forward for development. This is discussed in more detail in the following section.

## Demand side issues

### The Letwin Review

- 2.24 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)<sup>5</sup>. 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.
- 2.25 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

- 2.26 The rural nature of Rother (82% 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 residents to obtain a mortgage.

Figure 7: Median and lower quartile workplace-based affordability ratios (2020)

Geography	Median	Lower quartile
England	7.84	7.15
South East	9.92	10.21
East Sussex	10.86	10.69
Hastings	9.31	9.65
Rother	12.75	10.92

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<sup>5</sup> <https://www.gov.uk/government/publications/independent-review-of-build-out-final-report>

2.27 Figures 8 and 9 below show how the median and lower quartile workplace-based affordability ratios have increased since 2011.

Figure 8: Median workplace-based affordability ratios (2011 - 2020)

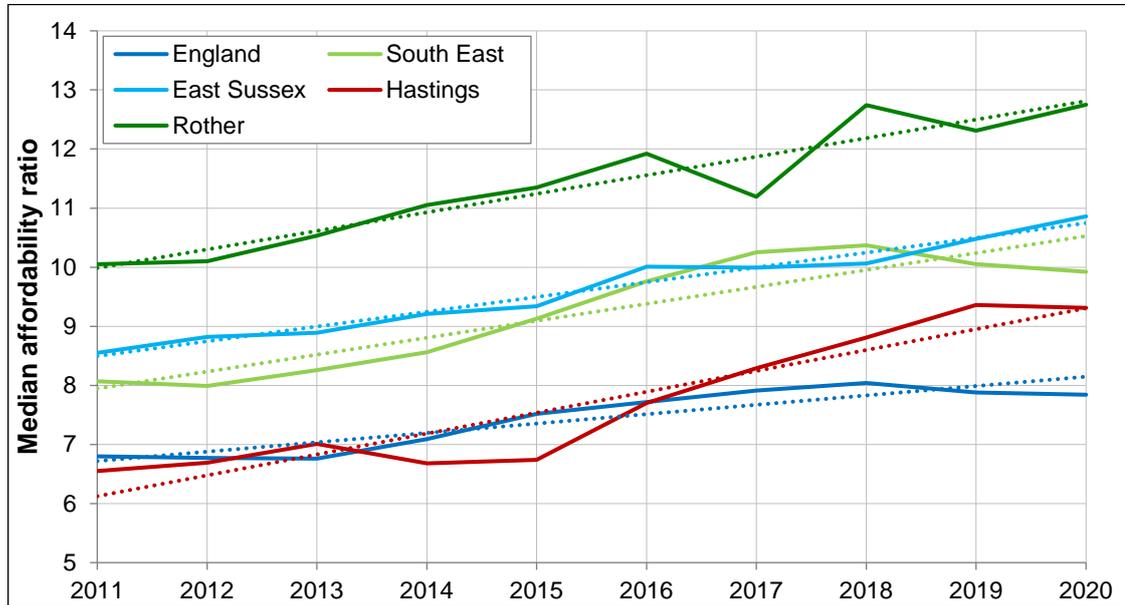
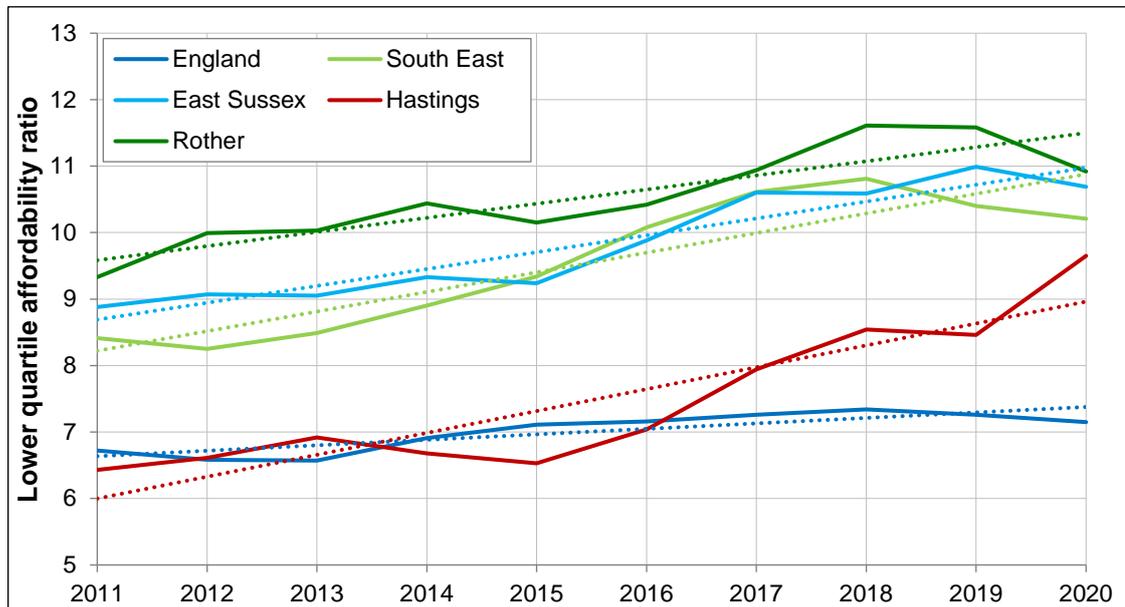


Figure 9: Lower quartile workplace-based affordability ratios (2011 - 2020)



## Summary

- 2.28 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.
- 2.29 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 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.
- 2.30 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 this central conclusion of the Letwin Review will become a feature of build-out rates in Rother.
- 2.31 It should be noted that the Reserved Matters application for the Blackfriars site was approved in April 2021 and the site has Housing Infrastructure Fund (HIF) funding for the construction of the spine road to serve the development.

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

- 2.32 The COVID-19 pandemic has had a significant impact on housing delivery in Rother over 2020/21. Housing completions over the past year have been approximately half of what was forecast in the 2020 Housing Land Supply position statement, with most of the shortfall coming from the major sites of Worsham Farm, Barnhorn Green, Preston Hall Farm and Tollgates.

- 2.33 It is clear from recent communications with housebuilders that their ability to develop sites has been affected by the reduction in construction capacity, particularly during the first lockdown.
- 2.34 Whilst the pandemic has not had a considerable impact on the 2020 HDT measurement, it is likely that the 2021 measurement, expected to be published in November, will be more severely affected.
- 2.35 In fact, the poor housing delivery experienced in 2020/21 will have a lasting impact on the Council's HDT results for the next three years. When combined with the increasing housing requirement, because of more years being phased in where the Council's annual housing target is determined by the standard method for assessing local housing need, it is envisaged that the Council's HDT results will decline considerably over the next 3 years or until a new housing requirement is adopted through the new Local Plan.

### 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, considering revised National Planning Policy Framework.

## Policy responses through the DaSA Local Plan

3.2 In response to the HIT&FG, the adopted DaSA contains policies that put into action several 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 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 Study<sup>6</sup> (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.

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<sup>6</sup> [https://www.rother.gov.uk/wp-content/uploads/2020/01/12\\_Rother\\_Local\\_Plan\\_Viability\\_Final\\_Report.pdf](https://www.rother.gov.uk/wp-content/uploads/2020/01/12_Rother_Local_Plan_Viability_Final_Report.pdf)

- 3.3 Moreover, a general theme of the DaSA 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 and 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...”
- 3.4 Towards this end, of the 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.
- 3.5 Additionally, the DaSA policy **DHG6: Self-build and Custom Housebuilding** 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 Update**

- 3.6 Local Plans should be reviewed every five years. The current Core Strategy was adopted in September 2014 and covers the period 2011 to 2028. With only 7 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.
- 3.7 To this end the Council is preparing for a prolonged stage of early engagement on the Local Plan Update before the anticipated Regulation 18 consultation tentatively programmed for late 2021/early 2022. A revised Local Development Scheme was published in March 2021.

- 3.8 The Council has completed a consultation on the Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA) Scoping Report with statutory consultees and additional specific consultees including neighbouring planning authorities.
- 3.9 The Council has also prepared a Project Initiation Document (PID) which will be developed into a tool for early engagement, as well as a Duty to Cooperate Action Plan/Engagement Strategy. Internal engagement with Members has commenced 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.
- 3.10 The Council is looking to deliver a spatial development strategy that seeks to deliver a significant uplift in housing delivery, and as such evidence base documents are being prepared to comprehensively assess opportunities across the whole District, whilst being mindful of development constraints. Such key evidence base documents include:
- A joint **Housing and Economic Development Needs Assessment (HEDNA)** with Hastings Borough Council which will assess future housing needs, the scale of future economic growth and the quantity of land and floorspace required for economic development.
  - A **Settlement Review** which will serve 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 will also provide 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 includes a Call for Sites, will help to identify a future supply of land in the District which is suitable, available and achievable for housing and economic development. The Call for Sites ran from 12 October to 7 December 2020 and work is now underway with assessing the submitted sites, sites carried forward from the previous SHLAA (2013) and sites identified by officers.
  - A **Windfall Assessment** which will provide justification for the likely contribution that windfall sites can make to the Districts housing supply over the course of the new plan period.

- A **Strategic Flood Risk Assessment (SFRA)** which will inform the Sustainability Appraisal of the Local Plan Update 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) will be available shortly, however, the report has yet to consider potential locations for development to inform the new Local Plan (up to 2039). 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.

## **Proactively investing in infrastructure**

- 3.11 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 yet 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. This demonstrates that the Council has sought funding for key infrastructure so that this site can come forward. The Reserved Matters application was approved in April 2021 and development is expected to commence in the summer.
- 3.12 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 DaSA Local Plan.

- 3.13 Potential improvements to the east/west coast mainline through a high-speed rail extension would also provide significant economic benefits to the district. Improved commuter access to Ashford and London could improve market attractiveness and encourage further development in and around Bexhill. As such, the Council will continue to engage with Network Rail and investigate the feasibility of progressing this project.

### **Incorporation of a Local Housing Company**

- 3.14 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.
- 3.15 It will allow the Council to take on a more proactive approach in acquiring land and bringing sites forward for development, securing high-quality 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. Alliance Homes (Rother) Ltd. was incorporated in October 2020.
- 3.16 The programme initially aims to complete 1,000 new homes by 2035, with the primary objective being to increase and accelerate the overall delivery of housing in the district.
- 3.17 This programme will commit to delivering schemes that fulfil their affordable housing commitment, as per Local Plan Policy, meaning that between 350-400 new affordable homes will be delivered throughout this process. 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.
- 3.18 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.

- 3.19 Sites already owned by the Council with planning potential or being acquired as part of other council led projects will be the focus of the early years' development. However, to ensure a strong pipeline of future projects the Company will seek opportunities to acquire sites allocated for housing in the Rother District Local Plan and associated Neighbourhood Plans.
- 3.20 Looking further ahead for delivery beyond five years of this plan, the Company will seek a range of new opportunities to acquire sites, to include speculatively acquiring land, which could be proposed as part of any future Local Plan review of deliverable sites considered to have planning potential.

## **Developer engagement**

### Worsham Farm

- 3.21 On 17 April 2019, Rother District Council produced a Statement of Common Ground 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).
- 3.22 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. The development of phase 1 (200 dwellings) has been commenced and includes the key infrastructure required to develop the future phases.
- 3.23 Recent communications with the developer have suggested that there has been some slippage in the delivery of Phase 1. Given the multiple COVID-19 lockdowns over the past year, whether the schedule agreed in the Statement of Common Ground is still achievable is yet to be determined. However, engagement with landowners and development through the production of the evidence base supporting the new Local Plan will flesh this out in due course.

### Preston Hall Farm

- 3.24 The Council has also produced a Statement of Common Ground 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. Again, there has been some slippage due to COVID-19 and whether completion is still expected by the end of 2021/22 is not yet known. However, engagement with landowners and development through the production of the evidence base supporting the new Local Plan will flesh this out in due course.

### Landowners Forum

- 3.25 Due to the COVID-19 pandemic and the necessary social distancing measures that have been put in place, it has not been possible to progress as expected with setting up a Landowners Forum. It is hoped that with measures being relaxed and life returning to normal over the next few months that the Landowners Forum can be instigated in order to feed into the plan-making process as per the recommendations of the HIT&FG report.

## **Summary of Key Actions**

- 3.26 Given the Government's expectations to increase housing delivery, progressing the new Local Plan will be prioritised. Clearly a step change in delivery is necessary and a comprehensive assessment of opportunities across the whole of the district will be required.
- 3.27 The HELAA (including the Call for Sites) and Settlement Review will be key in identifying the potential capacity for new development and assessing Council owned land for its planning potential will form an important part of this process.
- 3.28 Whilst ensuring the new Local Plan is sound, covers an appropriate level of early engagement and meets Duty to Cooperate requirements, it will be important to proceed with its production and adoption as soon as possible.
- 3.29 An updated and adopted housing requirement figure, together with further housing sites allocated in the new Local Plan, will help to tackle the poor HDT results the Council is likely to experience over the next three years.

- 3.30 The Council should also support the delivery of housing through the Council's Local Housing Company, Alliance Homes (Rother) Ltd., be proactive in the granting of planning permission on the DaSA site allocations and continue to invest in infrastructure.
- 3.31 Reviewing this Action Plan with a view to incorporating feedback from further developer and stakeholder engagement is also seen as a high priority, including the implementation and findings of the Landowners Forum.
- 3.32 These 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	Steps	Timetable	Status
Development and Site Allocations Local Plan	Submission of DaSA for Examination	January 2019	Complete
	Conclusion of DaSA Examination Public Hearings	July 2019	Complete
	Drafting of DaSA Modifications incorporating recommendations of the HIT&FG	July 2019	Complete
	Consultation on the Modifications to the Proposed Submission DaSA	July - September 2019	Complete
	Conclusion of DaSA Examination	November 2019	Complete
	Adoption of the DaSA	December 2019	Complete
	Granting of planning permissions on site allocations	Ongoing	In Progress
Local Housing Company	Incorporation of Alliance Homes (Rother) Ltd	October 2020	Complete
	Delivery of housing through the LHC	Ongoing	In Progress
Local Plan Update	Stakeholder Engagement and Evidence Gathering	Up to Q4 2021/22	In Progress
	Publish a new LDS	March 2021	Complete
	HELAA/Call for sites	Winter 2021	In Progress
	Draft Plan Consultation	Q4 2021/22	Not started
	Pre-submission Publication Consultation	Q3 2022/23	Not started
	Submission	Q4 2022/23	Not started
	Examination	Q1 2023/24	Not started
	Adoption	Q3 2023/24	Not started
Landowners Forum	Set up Landowners Forum	Early 2022	Not started
Action Plan	Review this Action Plan	Within 6 months of 2021 HDT measurement	Not started