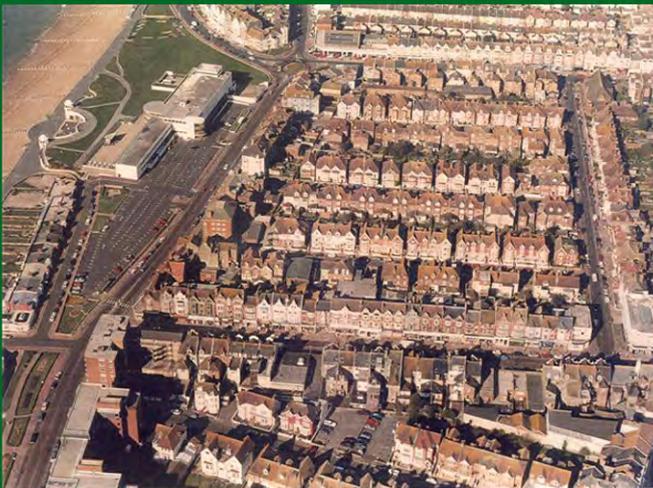




# Rother District Council

## Strategic Housing Land Availability Assessment (SHLAA) 2013 Review Part 1 - Main Document



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**The SHLAA is an 'evidence-base' document which does not allocate land for housing nor pre-empt or prejudice any future Council decisions about particular sites. It is an aid to plan making and not a statement of Council policy. Specifically it informs the preparation of the Local Plan Core Strategy and the subsequent Development and Site Allocations DPD.**

**A positive assessment of individual sites does not indicate these sites will definitely be developed and does not outweigh or alter any existing policies or land use designations. However, the SHLAA does provide evidence that will be kept up-to-date and used to inform the preparation of the Local Plan.**

**It is noted that some of the sites identified in the SHLAA are the subject of a current planning application. However, inclusion within the SHLAA does not imply acceptance of any scheme, the details of which will need to be fully evaluated through the Development Management process, taking full account of all consultation responses and other representations received.**

# STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT (2013 REVIEW)

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## Executive Summary

### **Government Requirements**

Rother District Council has prepared a Strategic Housing Land Availability Assessment (SHLAA) as required by the Government's [National Planning Policy Framework \(NPPF\)](#). The SHLAA process has been undertaken in accordance with [Government Practice Guidance \(July 2007\)](#). The Assessment will form a key part of the evidence base for the Council's Local Plan (2011-2028) Core Strategy Development Plan Document (DPD) and will inform the preparation of the Development and Site Allocations DPD.

### **Assessment Objectives**

Like all local authorities, Rother District Council is required to prepare a SHLAA to identify potential opportunities to meet housing requirements. This objective is achieved by examining all potential sites to ensure that Rother's housing provision is based upon the most sustainable sites and locations.

However, Government guidance clearly states that the SHLAA is not an allocations document and that it *'does not in itself determine whether a site should be allocated for housing development. The Assessment findings will be particularly relevant at the issues and options stage of development plan preparation'*<sup>1</sup>.

### **Key Findings of the 2013 Assessment**

This 2013 Review of the SHLAA updates the previous SHLAA version published in March 2010. The 2010 SHLAA is still relevant in so far as providing a more detailed audit of the process. At the time of publication of the SHLAA (2013 Review), there were 627 sites that the Council has considered as part of the process. The Assessment has used a base date of 1st April 2013.

The 2013 SHLAA Review has identified a potential housing supply of **6,139** over the plan period 2011-2028. The components of this, as well as the broad geographic split, are set out in Table 1. Table 2 contains more detail specific to the rural areas.

This total includes 275 dwellings completed in the first 2 years of the plan period (2011-2013). A further 1,130 dwellings are classed as 'commitments'<sup>2</sup> which predominantly comprise unimplemented planning permissions. There are 1,607 dwellings from unimplemented allocations from the 2006 Local Plan (following re-assessment as part of the 2013 SHLAA). A further 1,405 are from proposed 'new' allocations. In addition there are 1,198 dwellings from 'Broad Locations'<sup>3</sup>, an allowance for 460 'small site windfalls' and for 65 'Rural Exception' sites.

Note: These cumulative 'totals' should be treated with caution. Whilst assumed dwelling numbers on individual settlements may be developable for the number indicated, it does not necessarily follow that all sites within a settlement can be developed cumulatively and concurrently. This is particularly the case in Bexhill, constrained as it is by acknowledged issues of both highways capacity and build-out rates.

Part 2 of the SHLAA (2013 Review), which is a separate document, contains the detail relevant to individual sites and settlements and includes maps.

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<sup>1</sup> SHLAA Practice Guidance (2007), Paragraph 8.

<sup>2</sup> Includes permissions and applications delegated to approve subject to S106

<sup>3</sup> As defined in SHLAA Practice Guidance stage 9.

**Table 1: Distribution of District Housing**

Base Date: 01/04/13

Settlement/Area	All Net Completions in Plan Period (01/04/2011 to 31/03/2013)	Current Commitments See Footnote 2	Allocations (Remaining from 2006 Local Plan) See Footnote 3 & 7	Potential New Sites See Footnote 4	Broad Locations see footnote 8	Small Site Windfall Allowance (in Years 5-15, 2018-2028)	Rural Exception Sites Allowance See Footnote 6	Total New Housing 2011 - 2028
Bexhill	64	337	1,450	451	300-870	153	N/a	3,325
Hastings Fringes	1	43	-	49	150	2	N/a	245
Battle	11	275	14	93	73	30	N/a	495
Rye	83	119	53	59	55	33	N/a	402
Rural Area (see Table 2 for detail)	116	356	90	753	50	242	65	1,672
<b>TOTAL</b>	<b>275</b>	<b>1,130</b>	<b>1,607</b>	<b>1,405</b>	<b>1,198</b>	<b>460</b>	<b>65</b>	<b>6,139</b>

2. Includes permissions and applications delegated to approve subject to S106. Full Details of all commitments contained in Part 2 of the SHLAA (page 112)

3. Subject to review and re-assessment as part of SHLAA process, see SHLAA Part 2 for details.

4. Estimated from suitable and developable (green and amber) SHLAA sites, see SHLAA Part 2 for details.

6. Rural Exception sites (which by definition are both locally driven by the community, and on sites that would not normally be suitable for housing) are considered separately and in response to a locally specific need. The overall rural area target is derived from the Council's Housing Strategy.

7. Rye's Allocation of 35 is the sum of RY8 (18) and RY3 (35). RY3 has been scaled back to reflect uncertainty over existing businesses and their possible relocation, whilst RY4 has a retail permission.

8. See SHLAA Part 2 for details. Rye: Broad Location is the sum of RY53 and RY36.

## Table 2: Distribution of Rural Housing

Base Date: 01/04/13

Settlement/Area See Footnote 1	All Net Completions in Plan Period (01/04/2011 to 31/03/2013)	Current Commitments See Footnote 2	Allocations (Remaining from 2006 Local Plan) See Footnote 3	Potential New Sites See Footnotes 4 & 9	Total New Housing 2011 - 2028 See Footnote 5
Robertsbridge	2	6	47 (+1)	100	155
Ticehurst	-10	6	0	87	83
Hurst Green	0	6	0	75	81
Northiam	9	61	0	72	142
Broad Oak	2	19	0	50	71
Peasmarsh	5	4	0	50	59
Netherfield	7	0	0	48	55
Catsfield	7	10	0	47	64
Westfield	24	51	0	40	115
Burwash	-7	22	0	35	50
Sedlescombe	12	29	0	35	76
Etchingam	1	22	0	30	53
Staplecross	2	10	0	25	37
Camber	47	32	0	20	99
Fairlight Cove	2	5	17	20	44
Beckley / Four Oaks	2	18	0	20	40
Crowhurst	1	1	0	20	22
Flimwell	0	1	26 (+2)	17	44
Iden	2	4	0	12	18
Three Oaks	0	8	0	0	8
Winchelsea Beach	0	8	0	0	8
Udimore	0	7	0	0	7
Pett Level	1	4	0	0	5
Pett	3	1	0	0	4
Icklesham	1	3	0	0	4
Brede	2	1	0	0	3
Stonegate	0	2	0	0	2
Woods Corner	0	2	0	0	2
Cackle Street	0	2	0	0	2
Mountfield	0	2	0	0	2
Fairlight	0	2	0	0	2
Whatlington	0	2	0	0	2
Ashburnham	0	1	0	0	1
Dallington	1	0	0	0	1
Bodiam	0	1	0	0	1
Guestling Green	0	1	0	0	1
Brightling	0	1	0	0	1
Ewhurst	0	1	0	0	1
Burwash Common	0	0	0	0	0
Normans Bay	0	0	0	0	0
Burwash Weald	0	0	0	0	0
Friars Hill	0	0	0	0	0
Johns Cross	0	0	0	0	0
Winchelsea	0	0	0	0	0
<b>Rural Exception Sites Allowance</b>					65
<b>Small Site Windfall Allowance in Years 5-15 (2018-2028)</b>					242
<b>TOTAL</b>	<b>116</b>	<b>356</b>	<b>90</b>	<b>803</b>	<b>1,672</b>

1. Bold Font indicates village had a defined development boundary in the 2006 Local Plan.

2. Includes permissions and applications delegated to approve subject to S106. Full Details of all commitments contained in Part 2 of the SHLAA (page 112)

3. Subject to review and re-assessment as part of SHLAA process. Numbers in brackets indicate any revisions as part of re-assessment. See SHLAA Part 2 for details.

4. Estimated from suitable and developable (green and amber) SHLAA sites. Core Strategy policy expectation that new allocations are within or immediately abutting a village development boundary. See SHLAA Part 2 for details.

5. Individual village number may be higher as a result of additional windfalls and rural exception sites.

6. Rural Exception sites (which by definition are both locally driven by the community, and on sites that would not normally be suitable for housing) are considered separately and in response to a locally specific need. The overall rural area target is derived from the Council's Housing Strategy.

9. Including 50 from 'Broad Location' at Peasmarsh. See SHLAA Part 2 for details.

# ROTHER DISTRICT COUNCIL STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT

## Context and Key Principles

### Introduction

A.1 Strategic Housing Land Availability Assessments are a key component of the Local Plan evidence base to support the delivery of sufficient land for housing to meet Rother's need for more homes. These assessments are required by national planning policy, set out in the [National Planning Policy Framework](#) (NPPF). Process guidelines are currently set in the Department for Communities and Local Government document '[Strategic Housing Land Availability Assessments Practice Guidance](#)' (July 2007).

### National Planning Policy Context

A.2 A top priority for Government is to ensure that land availability is not a constraint on the delivery of more homes. Planning policy, as set out in the National Planning Policy Framework, seeks to significantly boost the supply of housing, and critically (in paragraph 47) requires local planning authorities to:

- Identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land.
- identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;
- Set out their own approach to housing density to reflect local circumstances.

### Local Planning Policy Context

A.3 The Rother District Local Plan was adopted in July 2006. It included a number of housing allocations.

A.4 The replacement Local Plan 2011-2028 will essentially comprise two key elements:

- (i) The Core Strategy DPD
- (ii) The Development and Site Allocations DPD

A.5 The Core Strategy as already gone through several stages and is now advanced in the process. Final housing numbers and allocations will ultimately be determined and progressed in the Adopted Core Strategy and the 'Development and Site Allocations DPD', informed both by feedback from consultations and from the Strategic Housing Land Availability Assessment (SHLAA).

## Purpose of the Assessment

- A.6 The primary role of the Strategic Housing Land Availability Assessment (SHLAA) is to:
- identify sites with potential for housing;
  - assess their housing potential; and
  - assess when they are likely to be developed.
- A.7 National guidance stipulates that the SHLAA should aim to identify as many sites with housing potential in and around as many settlements as possible in the study area. It should not be artificially constrained by the housing requirement.
- A.8 The Assessment findings will identify the choices available to meet the need and demand for more housing and provide a basis for making decisions about how to shape places in the future; and whether action would need to be taken to ensure sites will become deliverable (including infrastructure investment) or whether plan policies need to be reviewed to enable identified sites to be developed for housing.

**The SHLAA is an ‘evidence-base’ document which does not allocate land for housing nor pre-empt or prejudice any future Council decisions about particular sites. It is an aid to plan making and not a statement of Council policy. Specifically it informs the preparation of the Local Plan Core Strategy and the subsequent Development and Site Allocations DPD.**

**A positive assessment of individual sites does not indicate these sites will definitely be developed and does not outweigh or alter any existing policies or land use designations. However, the SHLAA does provide evidence that will be kept up-to-date and used to inform the preparation of the Local Plan.**

**It is noted that some of the sites identified in the SHLAA are the subject of a current planning application. However, inclusion within the SHLAA does not imply acceptance of any scheme, the details of which will need to be fully evaluated through the Development Management process, taking full account of all consultation responses and other representations received.**

## **Document Format**

A.9 The SHLAA (2013 Review) is in two parts:

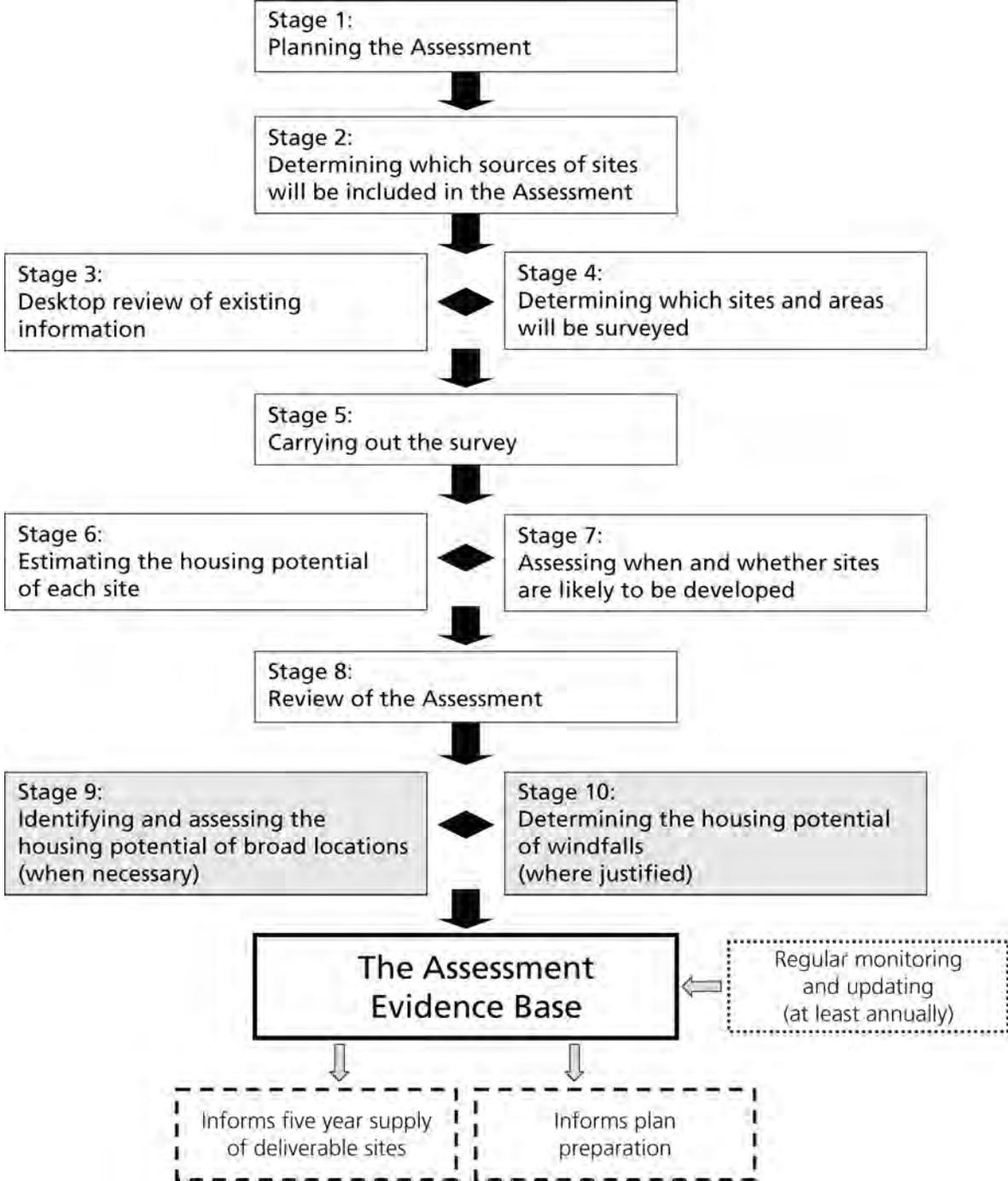
- (i) Main Document – explaining background, principles, key findings (including summary tables of housing numbers and distribution) and the ten stage SHLAA process as applied in Rother District.
- (ii) Settlement Maps and Tables – Detailing the assessment of individual sites and settlements, via tables and maps.

## **The Methodology**

A.10 As set out in national guidance, the Strategic Housing Land Availability Assessment has eight main stages, with two further optional stages, covering broad locations and windfalls. This is illustrated in Figure 1 opposite. The stages should generally be carried out in order, however, Stages 3 and 4, 6 and 7, and 9 and 10, may be carried out in parallel.

A.11 The following sections details Rother District Council's approach to the ten 'SHLAA stages'.

**Figure 1: The Strategic Housing Land Availability Assessment process and outputs**



## SHLAA Stages

### Stage 1 Planning the Assessment

- 1.1 Partner organisations, including public agencies, parish councils, developers and agents have all been given the opportunity to submit details of any potential sites (for housing or other uses including open space, leisure, employment, retail) they wished to submit for consideration.
- 1.2 The study will aim to identify sufficient specific sites for the plan period to 2028 in order to demonstrate that the Core Strategy is capable of delivering sites. This SHLAA Review operates within the context of a base-date of 1<sup>st</sup> April 2013.

### Stage 2 Determining which Site will be Included in the Assessment

- 2.1 SHLAAs are required to be a comprehensive assessment by national guidance, which states *'Except for more clear-cut designations such as Sites of Special Scientific Interest, the scope of the Assessment should not be narrowed down by existing policies designed to constrain development, so that the local planning authority is in the best possible position when it comes to decide its strategy for delivering its housing objectives.'*
- 2.2 In Rother the Area of Outstanding Natural Beauty (AONB) has 80% coverage, whilst large parts of the remainder of the District are subject to other restraints such as international habitat designations and flood risk. However housing requirements in effect necessitate some housing development within the AONB. Housing development in rural Rother is also necessary and justified by the extent of local needs.

### Stage 3 Desktop Review of Existing Information

- 3.1 A thorough desktop review of existing information took place.

#### Sources of Site

- 3.2 The full list of sources of site is as follows;

#### *Sites Already 'in the Pipeline'*

- Planning permissions not yet completed (Up to the base date of 01/04/13)
- Local Plan allocations and reserve sites not yet permitted

### *External Sources*

- External Consultation
- National Land Use Database (NLUD)
- Register of Surplus Public Sector Land

### *Sites Already Brought to the Council's Attention by Other Means*

- RDC Urban Capacity Study (not allocated or permitted)
- Considered during Local Plan preparation but not included as Local Plan Allocations
- Considered in RDC's 'Towards a Planning Strategy for Rother District' but not included as Local Plan Allocations
- Local Plan Omission Sites
- LDF Core Strategy Issues & Options Consultation
- Exception Sites Project

### *Internal Consultation*

- RDC (Estates)
- RDC (Regeneration)
- RDC (Development Control)

### *Site Identified During the Course of Undertaking the SHLAA*

- Sites identified 'on-site'
- Sites identified from aerial photography
- Site identified by Parish Councils via Village Study Working Groups

3.3 Some sites fell into several categories.

### Policy Context and Identified Needs

3.4 For individual settlements, a desk-top review of the land use needs identified in statutory planning documents and evidence studies was undertaken. This ascertained identified needs for a number of uses, not just housing. This was so that site visits would have multiple purposes – in addition to informing the SHLAA, they would also inform the future Development and Site Allocations DPD by identifying suitable sites for other uses.

3.5 To set the policy context and identified needs, reference was made to the following:

- Rother District Local Plan
- Waste and Minerals Local Development Framework,
- Emerging Core Strategy
- Background Material to the Core Strategy, including
  - Strategic Housing Market Assessment (SHMA) & Update
  - SHLAA 2010

- Rural Settlements Study and
  - Urban Options Background paper
  - Local Plan Evidence Studies
    - ESCC Landscape Assessments
    - Open Space, Sport and Recreation Study
    - District Wide Shopping Assessment
    - Hastings & Rother Employment Strategy Review
  - Other relevant material such as Parish Local Action Plans or Housing Needs Surveys.
- 3.6 Thus the 'Policy Context and Identified Needs' box on site appendices i-ii has a two-fold purpose. It cites existing Local Plan policy of relevance to the site, in addition to the environmental factors cited elsewhere on the form.
- 3.7 Secondly it cites 'Identified needs' which may be needs for housing, employment, retail, open space or any other land use that have been identified in the most recent version of the Core Strategy, the process of Local Plan evidence gathering or in other relevant material.
- 3.8 This provided the context for site visits, enabling planning officers to be mindful of what the needs were within individual settlements and to particularly focus attention on finding appropriate sites to meet the identified needs.
- 3.9 However, it is important to note that unlike the evaluation of sites for Development Management purposes, the assessment of sites for SHLAA is not limited by existing Local Plan policy. Sites that are prevented from development by existing policy should also be reviewed in the light of current circumstances, not least the housing requirements
- 3.10 Nor was the examination of sites restricted to the recommendations of evidence or emerging policy For example, for SHLAA purposes the examination of sites for housing was not limited to settlements that had previously been identified for housing growth in the emerging Core Strategy. In this way the SHLAA will serve the purpose of informing the final housing distribution within the Core Strategy.

## **Stage 4 Determining which Sites and Areas will be surveyed**

- 4.1 The Government's SHLAA guidance (paragraph 25) discusses the factors to take into account in determining how comprehensive (in terms of the geographic coverage) and intensive (in terms of the minimum size of site to be surveyed) the survey element of the assessment needs to be. It suggests that assessments will need to be more comprehensive and intensive where housing market conditions<sup>4</sup> signal worsening affordability, reflecting the need to identify more sites for housing. The problem of affordability in Rother is well documented.

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<sup>4</sup> Housing Market Information Advice Note (DCLG, 2007). This note sets out an approach that local planning authorities can use to develop their understanding of housing markets.

- 4.2 National guidance stipulates another factor to take into account is the nature of the area. It states 'in areas dominated by smaller rural settlements, it may be necessary to identify all the sites with potential for housing, whereas this may not be necessary or feasible in more urbanised areas' Regarding the nature of land supply, national planning guidance states that where a large proportion of housing is expected to be delivered on small sites this may mean that the survey needs to identify smaller sites than would be necessary in an area where larger sites are likely to make up the bulk of supply.
- 4.3 The above factors were borne in mind when considering which sites and areas to survey in Rother.

#### Geographic Extent

- 4.4 Site submissions were only considered if wholly or in part within the district of Rother.
- 4.5 National and regional policy directs growth towards previously developed land in towns, market towns and larger villages that act as service centres. Therefore, early in the process the council clarified its intention to direct as much development as possible towards sustainable brownfield locations that are well related to existing development boundaries.
- 4.6 More than 80% of the Rother District's land area falls within the High Weald AONB. Rother enjoys the considerable benefits that AONB status brings, but conversely is somewhat limited in terms of development potential. Throughout the process, the Council has clarified that development will not be ruled out within the AONB, but will need to be in accordance with local needs and in conformity with the primary objective of AONB policy, namely the conservation of natural beauty, landscape and countryside.

#### Size Threshold

- 4.7 For resource efficiency purposes, the identification of sites in Rother was limited to those capable of accommodating 6 dwellings (for residential proposals) or more than 0.2 hectares in size. This threshold is consistent both with the SHLAAs of other local authorities in East Sussex, and also consistent with Rother's own monitoring processes and Annual Monitoring Report which sub-divides 'small' and 'large' sites at the same six dwelling threshold.

#### Sites Already Identified In Stages 2 and 3

- 4.8 In Rother, the identification of sites for SHLAA purposes has taken place in parallel with the identification of sites for the wider Site Allocations process so that land availability and suitability can be considered across the whole range of land requirements. This has resulted in sites brought to the Council's attention for a wide range of uses including employment, retail, parks & open spaces. However, the main focus of site visits was to examine suitability for housing uses and the assessments of sites for other uses will be covered in more detail as part of the Site Allocations DPD process.

- 4.9 Whilst an initial desk-top analysis may rule out a fair proportion of sites as unsuitable for housing, the same sites may nonetheless be suited to other uses and as a result, require a site-visit to assess this. Therefore, Rother DC has erred on the side of caution when determining if sites can be excluded from on-site appraisals, and settlements were visited with a view to 'place-shaping' a community rather than purely identifying housing sites. The basic approach is outlined in the following table.
- 4.9.1 The vast majority of sites submitted by external third parties have been subject to a rigorous assessment (including site visits) and assessed in the SHLAA. However more than half of all the sites assessed were not identified by third parties during the SHLAA process, but were identified by Council Officers.
- 4.10 Table 3 sums up some of the factors 'Determining which sites and areas will be surveyed'

#### Existing Allocations and Commitments

- 4.11 Allocations remaining from the 2006 Local Plan have been subject to a full re-assessment as part of the SHLAA process.
- 4.12 Current permissions and commitments are listed on page 112 of Part Two of the SHLAA (2013) Review. They are regularly reviewed as part of the Council's Monitoring Process. They have not generally been subject to a full assessment as part of the SHLAA. Permissions that have lapsed since the 2010 SHLAA have been assessed as part of the SHLAA.

**Table 3: Determining which Sites and Areas will be surveyed**

Source of Site	Determination of Whether Site Should be Surveyed
Submitted by External third party	<p>There is a presumption heavily in favour of surveying site, in order to fully respond and acknowledge those persons and organisations who have taken the trouble to respond to the Council's consultation. It is also to provide maximum certainty to developers and to avoid the need for resource intensive hearings at examination.</p> <p>Initially, all sites have been assessed against environmental factors. If environmental factors are weighted heavily against development (for example site is with SPA, SAC, Ramsar, SSSI) then the planning officer may make the decision that a site is not worth visiting.</p> <p>The only other reason for excluding a site from the SHLAA surveys is where it is too small (i.e. either below 0.2ha or not capable of accommodating 6 dwellings). Some sites, particularly in centres, that are below 0.2ha may be capable of accommodating 6 dwellings – in which case they are included. Very small sites abutting development boundaries may be considered instead as small scale amendments to the development boundary in due course.</p>
Internal (Desk-top Review of Existing Information)	<p>Where sites have <i>not</i> been formally identified by external parties in the consultation period, the Council has taken a more flexible view as to whether they require a site visit.</p> <p>Initial discussions have taken place with a panel of Development Control officers to gain their perspective of whether a site is developable (referred to as Sieve 1). This ruled out a small number of sites as being clearly un-suitable for housing development and therefore not worth visiting for SHLAA purposes.</p> <p>The only other circumstance which justified excluding a site from the SHLAA surveys is where it is too small (i.e. either below 0.2ha or not capable of accommodating 6 dwellings). Some sites, particularly in centres, that are below 0.2ha may be capable of accommodating 6 dwellings – in which case they are included. Very small sites abutting development boundaries may be considered instead as small scale amendments to the development boundary in due course.</p>

## **Stage 5 Carrying out the Survey**

### Initial Assessment of Development Opportunities

- 5.1 Initial Surveys were carried out in accordance with DCLG guidance stage 5 and examined site size, boundaries, use, character, physical constraints, environmental and landscape factors.
- 5.2 Site surveys of more than 600 sites were conducted. On-site surveys were also useful to identify further sites with potential for housing development which were not identified by the desktop reviews.

## **Stage 6 Estimating the Housing Potential of Each Site**

### Housing Density Assumptions

- 6.1 External parties who submitted potential sites were asked to give an indication of housing potential of their site and of indicative housing density.
- 6.2 As part of initial assessments carried out at stage 5 (described above), planning officers made an assessment of the housing potential of each site.

### Note on Tenure

- 6.3 There is no site specific consideration of housing tenure within the SHLAA, although there is a general recognition of the priority in identifying new housing to meet local needs, particularly for affordable housing. The tenure mix of sites will be considered further in the preparation of the Site Allocations DPD in the light of the overall affordable housing policy to be resolved in the Core Strategy.

## Stage 7 Assessing when and Whether Sites are Likely to be developed

### Stage 7a Assessing Suitability for Housing

7.1 The term 'suitable' requires some clarification, as it has a particular meaning in the context of national guidance on Strategic Housing Land Availability Assessments. A site is suitable for housing development if it offers a suitable location for development and would contribute to the creation of sustainable, mixed communities. CLG Guidance states the following more detailed explanation:

#### Box 1: CLG SHLAA Guidance Definition of 'Suitable' Site

Sites allocated in existing plans for housing or with planning permission for housing will generally be suitable, although it may be necessary to assess whether circumstances have changed which would alter their suitability. For other sites, the following factors should be considered to assess a site's suitability for housing, now or in the future:

- policy restrictions – such as designations, protected areas, existing planning policy and corporate, or community strategy policy (see paragraph 21 above);
- physical problems or limitations – such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;
- potential impacts – including effect upon landscape features and conservation; and
- the environmental conditions – which would be experienced by prospective residents.

7.2 Rother's two stage approach to assessing suitability is discussed in the section on '(i) Initial Surveys' below:

#### (i) Initial Surveys

7.3 Sites have been assessed in terms of policy restrictions, physical problems or limitations, potential impacts and environmental conditions. All the information to make this judgement should have been acquired from:

- Responses to the 'Sites Survey of external stakeholders, partners and interested parties', supplemented by internal checks.
- Site Surveys by RDC officers at stage 5.
- Results of LDF Evidence studies.

7.4 The assessment carried out using Form A was mindful of the 'Policy Context and Identified Needs' (as discussed at stage 3) and was essentially based upon 2 factors;

- *Environmental Factors*
- *On-Site Appraisals*

7.5 More detail on each of these factors is contained below;

### *Environmental Factors*

7.6 Rother is a District with a very rich environmental heritage. It was therefore considered to be absolutely vital to thoroughly and sensitively consider these factors to ensure only the most environmentally sustainable sites are developed. Conducted at desk-top, this provided a fundamental context for the site visits. Sites were screened and sieved for the following;

- Flood Zones 2 and 3
- Area of Outstanding Natural Beauty (AONB)
- Special Protection Area (SPA)
- Special Area of Conservation (SAC)
- Ramsar
- Site of Special Scientific Interest (SSSI)
- Scheduled Ancient Monument
- Registered Battlefield
- Strategic Gap
- Ancient Woodland
- Site of Nature Conservation Importance
- National Nature Reserve
- Listed Buildings
- Conservation Area
- Tree Preservation Orders (TPOs)
- Archaeological Sensitive Area (ASA)
- Groundwater Source Protection Zones 1, 2 and 3
- Groundwater Source Points
- Rights of Way & Bridleways
- High Weald AONB features:
  - Historic farmsteads
  - Ghyll woodland
  - Heathland
  - Historic Field Boundaries
  - Historic Routeways
  - Open Water
  - Ponds
  - Sandstone Outcrops
  - Water courses
  - Wildflower meadows
- UK Biodiversity Action Plan Habitats. Priority habitats of relevance to Rother includes:
  - Ancient and/or species-rich hedgerows
  - Cereal field margins
  - Chalk rivers
  - Coastal and floodplain grazing marsh
  - Coastal saltmarsh
  - Coastal sand dunes
  - Coastal vegetated shingle
  - Eutrophic standing waters (pond data)
  - Fens
  - Lowland calcareous grassland
  - Lowland heathland
  - Maritime cliff and slopes

- Mudflats
- Reedbeds
- Saline lagoons
- Wet woodland/Floodplain Forest
  
- Special to Sussex non-BAP Habitat
  - Ghyll Woodland
  - Sandstone outcrops
  - Roadside verges
  - Urban areas
  - Ancient Woodland

### *On-Site Appraisals*

7.7 As the CLG SHLAA guidance states in paragraph 24 ‘as a minimum all sites identified by the desk-top review should be visited’. The results of these site visits were added to Form A and included an assessment of the following factors;

- Character of area (including relationship to key services)
- Density of neighbouring homes
- Potential adverse affects on neighbouring amenities
- Physical constraints and topography
- Landscape issues / visual linkages (including into the site from public vantage points if the site is considered to have potential)
- Access issues (including movements across site and need for 3<sup>rd</sup> party access)
- Impact of traffic on character and road network
- Trees
- Hedgerows
- Watercourses
- Drainage
- Contamination or Pollution issues

7.8 If officers considered the site to have any development potential, they also addressed the following two issues:-

- Layout/design parameters
- Potential Mitigation Measures

7.9 Following completion of this initial survey work and site visits the majority of sites were ruled out as ‘not suitable’. Full details of these ‘not suitable’ sites can be found in Part 2 of the 2013 SHLAA.

7.10 Some sites, although suitable, have been excluded from the SHLAA because there is not considered to be ‘a reasonable prospect’ of them being developed within the plan period (as consistent with PPS3 and CLG SHLAA Guidance). Such sites also appear red on the maps. Typically such sites may have owners who are unwilling to develop. In practice many of these may eventually be developed as ‘large site windfalls’ over the course of the plan period.

## (ii) More Detailed Investigation

- 7.11 The above surveys resulted in a sieved list of sites that could possibly be considered suitable for housing development.
- 7.12 In order to further assess this refined list of sites, more detailed investigations were undertaken. These more detailed investigations further assessed suitability and developability. The more detailed investigations comprised the following:
- 7.13 A search of planning history of sites was also conducted.

## Accessibility to Key Services

- 7.14 This was partly assessed in the initial assessment of suitability on Form A, in which the on-site appraisal section included an assessment of 'Character of Area (including relationship to key services)'
- 7.15 As part of the more detailed assessments actual walking distance from the sites logical access point to key services has been measured in metres. Key services include;
- Convenience Food Shop
  - Primary School
  - Bus Route
  - Railway Station
  - Doctor's Surgery
- 7.16 This is particularly useful for comparing sites with one another. In many cases, several sites may have been identified within a particular settlement. The development of all such sites may result in a level of unsustainable growth that is harmful to community cohesion, in light of the original settlement scale.
- 7.17 Sites may therefore be excluded where they are poorly related to existing services, particularly where there are alternative sites that are better related. A justification for this approach can be found within the ODPM document 'Places, Streets & Movement'. Regarding 'Residential roads and footpaths' it states the following:

'A priority for planners should be to enable people to have access to local facilities on foot or by bicycle. Ideally this means a local shop for daily needs within five to eight minutes' walk (400 metres) of home. If possible there should also be a mixture of shops, businesses and other uses within walking distance. The principle of the walkable neighbourhood is the key to creating a sociable, sustainable community.'

'Planning has a key role to play in helping to achieve this more sustainable pattern of development. It seeks to integrate those economic, environmental and social factors, which are all important to sustainable development, in making decisions about where to put homes, jobs, shops

and leisure facilities. By doing so, it can limit demands on land and the environment, and reduce the need to travel, especially by car.'

### Transport (Development Control East Sussex County Council)

7.18 Advice was sought from East Sussex County Council highway's engineers on sites passing the initial tests of suitability. This advice related to the following checklist which was agreed with ESCC:

#### **Box 2: ESCC Highways Assessment Criteria**

##### *Primary Concerns*

###### The site

- Can site be accessed appropriately and safely?
- Are ground levels conducive to development proposal?

###### The surrounding area

- Footways
- Cycleways
- Suitable junctions and roads

###### Impact of the development

- Scale of development + existing infrastructure
- Does this affect the surrounding highway network in terms of capacity/safety?

##### *Secondary Concerns*

- Reasonable mitigation measures
- Junction improvements – signals, roundabouts, visibility....
- Footways
- Traffic calming
- Car parking
- Improvements to public transport services/infrastructure
- Pedestrian crossings
- Cycle routes
- Check LATS for any schemes

### Highways Agency

7.19 Discussions also took place with the Highways Agency regarding those sites that fell within the HA's area of responsibility, namely those abutting either the A259 or A21 trunk roads.

### Landscape

7.20 The site visits assessed landscape and visual linkages into and out of site. These assessments by Rother District Council were cross-checked against the findings of studies produced for RDC by the East Sussex County Council landscape team. These included:

- The 'Core Strategy: Market Towns and Villages Landscape Assessment' produced in late 2009, and;
- The 'Core Strategy: Landscape Assessment for Bexhill and Hastings Fringes produced in March 2008.

7.21 These studies sub-divided town and village fringe locations into a series of landscape character areas. Each area was assessed on its 'Capacity to Accept Change' in terms of both business use and housing, with results ranging from 'None' through 'Low', 'Moderate' to 'High'. In addition the County Landscape team commented on individual sites questions in some cases.

### Environment Agency

7.22 Where sites overlapped with the EA defined Flood zones 2 or 3, it was noted that they may be developable subject to the sequential and exception test (as set out in PPS25). The Environment Agency have given their views regarding these sites and where applicable these can be seen alongside other sites information in the appendices. They also provided general comments on:

- Flood risk
- Land contamination and groundwater protection
- Water quality
- Ecology

### Strategic Flood Risk Assessment (SFRA) and Southern Water

7.23 The initial site assessments (Form A) looked at sites relationship to flood zones 2 and 3 (as defined by the Environment Agency). As part of the more detailed assessments on Form B, more detailed analysis was conducted for sites in respect of the following issues identified in the SFRA:

(i) Surface Water Drainage Flooding

Some built up parts of Rother are susceptible to flooding caused by poor surface water drainage. This may be caused by a high water table. High tides and high river levels can influence the height of the water tables. These areas are mainly situated on the Levels that were marshy ground until drainage ditches were dug to drain them.

(ii) Highway Flooding

There are no formal records of highway flooding, though one is due to be produced for regular flood spots. Records are kept of all culverts in excess of 1 metre in diameter. One problem is that often it is not known where drainage goes. Problems are mainly caused by bad jointing, alignment etc., or storm water getting into a foul sewerage system.

(iii) Sewerage Flooding

The SFRA contained a schedule of the sewerage flooding incidents that have occurred in Rother District over the past ten years.

7.24 Where sites identified in the SHLAA overlapped with any of the three constraints identified above, Southern Water have been consulted and invited for their comments. As part of this consultation they were provided with maps of the sites overlaid with SFRA constraints (Their responses have been included on sites appendices i and ii).

- 7.25 Whilst no sites were ruled out as a result of Southern Water comment, their advice requires the local planning authority and the developer to be mindful of the implications of sewerage infrastructure in development. Essentially this is as follows:

**Box 3**

**Summary of Southern Water Sites Guidance**

- Where existing capacity is currently available, it is not possible to guarantee future reservation of this capacity
- Where existing capacity is not currently available, development will need to be phased with the provision of the necessary infrastructure
- Where infrastructure crosses the site, development design should avoid building over existing infrastructure.

Habitats and Biodiversity Issues

- 7.26 Extensive surveys of environmental designations (including SSSI, SPA, SAC, Ramsar, SNCI, LNR, etc) took place at initial survey stage.
- 7.27 Further consultation also took place with Natural England, Sussex Wildlife Trust and Sussex Biodiversity Record Centre on more detailed environmental matters such as:

*Habitats Information*

- *UK Biodiversity Action Plan Habitats*
- *Special to Sussex Habitats*

*Species Information:*

- *Protected Species Register (PSR)*
- *Rare Species Inventory (RSI)*
- *Biodiversity Action Plan Species (BAP)*

Southern Gas Networks (Scotia)

- 7.28 Advice from RDC's Development Control section suggested that the only utility that may actually prevent the development of a site is the presence of a main high pressure gas cable. Therefore a search was conducted to ascertain if sites did overlap with main high pressure gas cable. This was as potential issue on three sites. As a consequence, Southern Gas Networks (Scotia) were consulted and asked for advice on both these sites as well as advice on a number of rural sites which do not have any gas at all in vicinity.
- 7.29 Southern Gas Networks (Scotia) replied informing RDC of details of the nearest main supply pipes for sites. For each site they were consulted on, they stated that 'Gas Diversionary or abandonment works may be required'.

- 7.30 For relevant sites, details of their full replies can be seen on sites appendices i and ii.

### Contamination

- 7.31 Rother District Council's own Environmental Health section has been consulted regarding potential contamination issues on sites.
- 7.32 Feedback from Environmental Health comes with several caveats as follows: 'Information is not detailed – it is an indication of potential contamination. More research will be needed and would normally form part of a desk study to accompany a planning application. Such development would attract the Council's land contamination condition. More site specific data would be required. Any existing reports on sites only apply to the relevant planning permission. Further investigations may be needed if a current commercial usage wishes to change to residential. Adjoining land has been included as pollution can migrate onto site from off site sources.
- 7.33 From the information gained to date, there does not appear to be anything insurmountable that would prevent conditional approval of development on these sites. However the feedback has highlighted a number of potential contamination issues that the local planning authority and the developer will need to be mindful of in development. For relevant sites, details of their full replies can be seen on sites appendices i and ii.

### **Stage 7b Assessing Availability**

- 7.34 This stage was not generally necessary for sites identified by 3<sup>rd</sup> parties on the standard form, since the form was structured to ascertain availability. In other words, submittees were required to state their interest in the site (e.g owner, agent, etc) and whether or not they had the owners consent to submit the site for consideration.
- 7.35 For any sites identified by other means in stages 3 and 4, it has been necessary to establish ownership. This was done by checking planning application records, pre-application records and records of the local plan process. For any site where ownership was still not possible to establish following these stages, legal searches to establish ownership have been conducted.
- 7.36 Owners were then contacted to establish availability. In some instances the communications to establish aspirations of owners are ongoing.

### **Stage 7c Assessing Achievability**

- 7.37 A site is considered 'achievable' for development where there is a reasonable prospect that housing will be developed on the site at a particular point in time. This is essentially a judgment to be made regarding the economic viability of the site and how it might be affected by:

- Market factors – such as adjacent uses, economic viability of existing, proposed and alternative uses in terms of land values, locality, market demand and projected rate sales;
- Cost factors – to include site preparation costs, any exceptional works necessary, planning standards and obligations, prospect of funding or investment to address identified constraints;
- Delivery factors – including developer phasing, build-out rates, whether there is a single or several developers offering different housing products and the size and capacity of the developer.

7.38 In order to assess these matters with the most locally relevant market information, Rother's Housing Market Partnership was consulted as part of the original SHLAA document. Details of this, including an assessment of 'archetype' sites (each typically representative of the sites being considered within the SHLAA), can be found in the original SHLAA. This has enabled the Council to make informed judgments regarding the wider selection of sites in the SHLAA. In addition, as part of the 2013 Review, the views of in-house surveyors from the Council's Regeneration team regarding viability of specific sites have been incorporated.

### **Stage 7d Overcoming Constraints**

7.39 Where constraints have been identified, the SHLAA will also need to consider what action would be needed to remove them e.g. new infrastructure, dealing with fragmented ownership, environmental improvements, amending planning policy. Section 7d may be usefully informed by the results of studies described in part 7a. At this stage, Rother's SHLAA has been as comprehensive as possible, but it is recognised that further work is needed at individual site level to address infrastructure and some other matters.

### **Outcomes of Stage 7**

7.40 By the end of stage 7, an informed judgment was possible as to the extent to which each site is suitable, developable or deliverable. The term 'suitable' was explained in section 7a above. In order to be defined developable 'a site should be in a suitable location for housing development, and there should be a *reasonable prospect* that it will be available for and could be developed within the first 10 years of the plan'. All the 'green' and 'amber' SHLAA sites are considered to have a reasonable prospect of being developed within 10 years.

#### *Green and Amber Sites*

7.41 As outlined above, all 'green' and 'amber' SHLAA 2013 sites are considered to have a *reasonable prospect* of being developed within 10 years. They will all be subject to further investigation and consultation and it cannot be assumed that they will necessarily progress to becoming development allocations, nor indeed they will meet all policy requirements and be granted planning

permission should they do so. They will still be subject to all national and local statutory and policy requirements. Furthermore, whilst individual sites may have a reasonable prospect of development within ten years, it does not necessarily follow that they *all* could be built out in this time frame.

- 7.42 The distinction between green and amber definition is essentially a judgement about the level of obstacles, or indeed further investigation that is required, on a site by site basis. Sites that are already within the development boundary or subject of a current allocation have by definition overcome at least some of the hurdles on the road to development. Amber sites are deemed to be those that require more detailed investigations of key factors and clarification of key matters. Typically, they may be sites more likely to be developed in years 5-10 of the plan period, rather than years 1-5.

## **Stage 8 Review of the Assessment**

### Local Plan Allocations

- 8.1 National guidance requires the local planning authority to review the suitability and developability of existing Local Plan housing allocations in the much the same as any other sites are reviewed. This has been done alongside other newly identified sites and the results of these exercises can be seen Part 2.
- 8.2 With one possible exception, all of the existing Local Plan housing allocations are considered suitable and developable. The possible exception relates to Local Plan policy VL12. Whilst policy VL12 not a 'housing allocation' in the usual sense, it is nonetheless a policy that, if implemented, would result in the development of more permanent dwellings. At present there are Environment Agency concerns over this policy, so it is not considered that the SHLAA sites in question (WB2 and WB5) can be considered either suitable or developable.
- 8.3 In two other cases (FL1/FL4a and RB8), a review of an unimplemented allocation has led to a marginally different conclusion regarding the number of dwellings that may be achieved on site.

### Level of Housing identified

- 8.4 Table 1 outlines the level of housing identified in the District. The 'green' and 'amber' sites constitute supply that has a reasonable prospect of delivery in the first 10 years of the plan period.
- 8.5 CLG guidance stipulates that stages 9 and 10 of the SHLAA process are optional and dependent on housing numbers demonstrated from earlier SHLAA stages. In view of the level of housing need nationally, Rother's SHLAA has completed stages 9 and 10 to ascertain potential from both 'broad locations' and 'small site windfalls'

## **Stage 9 Identifying and Assessing the Housing Potential of Broad Locations (when necessary)**

### Definition of Broad Locations

- 9.1 The SHLAA Practice Guidance describes 'broad locations' as areas where housing development is considered feasible and will be encouraged, but where specific sites cannot as yet be identified.

### Nine Broad Locations in Rother

- 9.2 Rother's 2013 SHLAA has identified nine broad locations as follows;
- Bexhill: Sainsburys/Station Road/De La Warr Mews/Clifford Road/Buckhurst Road

- Bexhill: Land south of Barnhorn Road (south-west Bexhill)
- North Bexhill
- Battle: Market Square and Central Area
- Battle: North West
- Rye: Land at Rock Channel
- Rye: Land East of Gateborough Farm, Winchelsea Road
- Rye: Land along Winchelsea Road
- Peasmarsh: Land at Pippins, Main Street

9.3 The now obsolete PPS3 (paragraph 55) was sympathetic to the inclusion of broad locations in years 11-15 of the plan period and clarified that *‘Where it is not possible to identify specific sites for years 11-15, broad locations for future growth should be indicated’*. Current guidance in the NPPF (paragraph 48) goes further and implies that broad locations can be included in years 6-10 – *“Local planning authorities should identify a supply of specific, developable<sup>12</sup> sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”*

9.4.1 Nonetheless, Rother has applied a more cautious approach by assuming that the broad locations, or at least a proportion of their overall capacity, will be developable in years 10-15.

## **Stage 10 Determining the Housing Potential of Windfalls (when necessary)**

10.1 National guidance in the form of NPPF paragraph 48 states that local planning authorities *‘may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.’*

10.2 The SHLAA 2013 Review includes an allowance for 460 (small site) windfalls. Although the NPPF gives scope to do so, RDC has not included any windfall allowance in the first five years; and no allowance at all for large site windfalls (6 or more dwellings).

10.3 This reflects the position as set out in the Core Strategy Schedule of Proposed Main Modifications (as approved by full Council on 21st January 2013). This sets out that given Rother’s past record of fairly consistent small site windfall developments, an allowance for these is made in years 5-10 and 10-15, at rates of 47 dwellings and 45 dwellings a year respectively. This compares with some 90 dwellings a year on small site windfalls over the last 10 years. The future allowances do not include any provision for redevelopment on garden land. This provides a total of 460 windfalls over the plan period, as demonstrated in Table 1 which also shows the distribution by geographic area.

- 10.4 Further details of how these windfall rates were calculated is contained within the Housing Land Supply and Housing Trajectory at April 2012’.
- 10.5 To conclude, it is considered that the reliance on windfalls is justified, and in the light of the NPPF, represents a comparatively cautious estimate in that it:
- Makes no allowance for large site windfalls across the plan period
  - Makes a relatively cautious allowance for small site windfalls, and none at all in years 1-5
- 10.6 During the first half of 2013, assumptions regarding windfall allowances have been further reviewed. In relation to small windfall sites, the estimated rate is still considered reasonable. Some more sites may come forward as a result of recent Government measures to further stimulate home building, including changes in Permitted Development Rights, but these are likely to be balanced by the impact of lower economic forecasts.
- 10.7 There is a strong historic trend of *large* windfall sites. These have generally been excluded from calculations in plan making in recent years because of their unpredictability. Also, within settlements, the SHLAA process is assumed to find most reasonable opportunities. However, during the course of SHLAA preparation several suitable opportunities have been identified that have not been included as ‘developable’ green or amber sites due to lack of current owner interest. Given that the plan period extends for 15 years and there is a reasonable expectation that some sites will change ownership, and therefore some of these may inevitably be future large site windfalls.

## **Conclusions and Next Stages**

- 11.1 Following completion of all ten stages, some conclusions and can be drawn regarding housing supply.

### Components of Potential Housing Supply to 2028

- 11.2 Table 1 on page 6 shows the components of potential housing supply 2011 to 2028 (the end of the plan period). For the overall quantum in relation to requirements, it shows that some 6,139 dwellings could potentially be achieved, more than half of which are located in Bexhill.
- 11.3 The contribution of the respective components to future housing supply (i.e. post 2013) are set out overleaf:

<b>Components of Supply</b>	<b>Estimated no. of dwellings</b>	<b>%</b>
Current commitments	1,130	19.4%
Outstanding Local Plan allocations	1,607	27.6%
Small site windfalls Years 5-10	235	4.0%
Small site windfalls Years 10-15	225	3.9%
SHLAA sites	1,405	24.2%
SHLAA broad locations	1,148	19.7%
Rural Exception Sites	65	1.1%
<b>Total</b>	<b>5,815</b>	<b>100%</b>

- 11.4 It can be seen that, over the next 15 years, SHLAA sites and Broad Locations could contribute significantly (about 45%) to overall housing supply. This emphasises the need to bring forward the Council's Development and Site Allocations DPD as soon as practicable.
- 11.5 In terms of supply over the first 5 and 10 years, the SHLAA identifies 2,737 dwellings on sites which already have at least in principle support, either through planning permission, resolution to grant planning permission or allocation in the extant Local Plan 2006.
- 11.6 The SHLAA also identifies a further 1,405 dwellings with a reasonable prospect of being capable of development in the next 10 years. These have varying degrees of likelihood of being brought forward, having regard to a range of deliverability considerations. Those with more issues affecting delivery, such as multiple ownership, significant costs or constraints to overcome or other uncertainties are identified as "amber" sites. Those with less constraining factors are identified as "green" sites. The tentative split between green and amber sites is approximately 60:40, as demonstrated by Table 4.
- 11.7 Hence, potential supply of identified sites developable in the next 10 years would yield up to 4,142 homes (2,737 + 1,405) before accounting for any contribution from broad locations or small windfall sites. The small windfall sites allowance in years 5-10 of 235 dwellings would give a total of 4,377 dwellings within the first 10 years.
- 11.8 Pending further site assessments, it is difficult to determine with any real certainty the contribution of development within broad locations (estimated at some 1,148 dwellings) would make within the first 10 years. However, it is anticipated that at least some of these would be capable of being brought forward within 10 years, if required.
- 11.9 Therefore, and acknowledging the limitations of the SHLAA process, it is reasonable to conclude that there is the potential to bring forward sites over the next 15 years (2013-2028) as set out below:

Years	Potential sources	Number
zero to five (2013-2018)	Commitments, existing allocations, green sites.	3,603
five to ten (2018-2023)	As above + amber sites and windfalls	4,420
ten to fifteen (2023-2028)	As above + broad locations and windfalls	5,864
N/a	Completions	275
Total		6,139

11.10 Hence, there appears to be the ready ability to meet both 5 and 10 year housing targets through the development planning process, on the assumption that the SHLAA capacity is not less than the actual housing requirement.

#### Next steps and use of the SHLAA

11.11 The SHLAA stands as the assessment by Council planning officers, taking account of technical and professional advice received, at the current time and on presently available information. A site's inclusion in the SHLAA does not mean it can now be developed. The SHLAA provides information as an aid to plan-making, but does not allocate land for housing nor make decisions on land use.

11.12 Hence, the SHLAA does not represent Council policy on future housing sites, but forms part of the evidence base for the Core Strategy which will need to be considered alongside other work, and refined over time. The Council has not made any policy commitment to housing development on sites in the SHLAA.

11.13 The Council will consider the findings of this SHLAA alongside other planning considerations in determining future housing targets. Any resulting proposed modifications to the Local Plan Core Strategy will be subject of further consultation.

11.14 Sites and broad locations identified in the SHLAA will be further assessed as part of the preparation of the Council's 'Development and Site Allocations Plan', which will involve testing through public consultation and independent examination and/or through the planning application process. This assessment will also consider whether there may be other, more suitable uses for sites and determine whether sites fit in with the preferred development strategy.

11.15 It is anticipated that this work will take place over the next 6 months, leading to publication of a draft Development and Site Allocation DPD for consultation in Spring 2014. Details will be published in due course and be widely advertised.

11.16 Inclusion of a site in the SHLAA that is beyond current development limits would normally only be allowed if it is subsequently included in a statutory Development Plan Document (DPD). The Local Plan 2006 will remain the basis for the determination of planning applications until new Local Plan 2011-2028 documents are adopted.

*Additional Sites*

11.17 Further sites can identified by interested third parties who consider them as appropriate for housing (having regard particularly to the Council's emerging Core Strategy) and submitted at any time for consideration in the process of preparing future development plan documents, including a Development and Site Allocations DPD.

**Table 4: Distribution of District Housing (with approximate green and amber split)**

Base Date: 01/04/13

Settlement/Area	All Net Completions in Plan Period (01/04/2011 to 31/03/2013)	Current Commitments See Footnote 2	Allocations (Remaining from 2006 Local Plan) See Footnote 3 & 7	Potential New Sites See Footnote 4			Broad Locations see footnote 8	Small Site Windfall Allowance (in Years 5-15, 2018-2028)	Rural Exception Sites Allowance See Footnote 6	Total New Housing 2011 - 2028
				Green (Approx.)	Amber (Approx.)	Total				
Bexhill	64	337	1,450	356	95	451	300-870	153	N/a	3,325
Hastings Fringes	1	43	-	14	35	49	150	2	N/a	245
Battle	11	275	14	60	33	93	73	30	N/a	495
Rye	83	119	53	17	42	59	55	33	N/a	402
Rural Area (see Table 2 for detail)	116	356	90	397	356	753	50	242	65	1,672
<b>TOTAL</b>	<b>275</b>	<b>1,130</b>	<b>1,607</b>	<b>844</b>	<b>561</b>	<b>1,405</b>	<b>1,198</b>	<b>460</b>	<b>65</b>	<b>6,139</b>

2. Includes permissions and applications delegated to approve subject to S106. Full Details of all commitments contained in Part 2 of the SHLAA (page 112)

3. Subject to review and re-assessment as part of SHLAA process, see SHLAA Part 2 for details.

4. Estimated from suitable and developable (green and amber) SHLAA sites, see SHLAA Part 2 for details.

6. Rural Exception sites (which by definition are both locally driven by the community, and on sites that would not normally be suitable for housing) are considered separately and in response to a locally specific need. The overall rural area target is derived from the Council's Housing Strategy.

7. Rye's Allocation of 35 is the sum of RY8 (18) and RY3 (35). RY3 has been scaled back to reflect uncertainty over existing businesses and their possible relocation, whilst RY4 has a retail permission.

8. See SHLAA Part 2 for details. Rye: Broad Location is the sum of RY53 and RY36.

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