
Hearing Statement – Matter 6 Housing Supply and Delivery

Rother Development and Site Allocations Local Plan Examination

Prepared for:

The Blue Cross

Prepared by:

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1. Introduction

- 1.1. This Hearing Statement is prepared and submitted by Savills on behalf of The Blue Cross in response to Matter 6 of the Inspector's Matters, Issues and Questions issued 22nd March 2019, in relation to the examination of the Rother Development and Site Allocations Local Plan (DaSA).
- 1.2. For information, The Blue Cross owns the St Francis Fields site (hereafter referred to as 'the site') in the village of Northiam and have submitted a pre-application enquiry to Rother District Council (RDC) in relation to the development of the site. Pre-application discussions with RDC are yet to be held.
- 1.3. This Hearing Statement should be considered alongside previous representations made by The Blue Cross to the Regulation 19 DaSA consultation.
- 1.4. Only questions of relevance to the site and The Blue Cross' interests are responded to here, although questions not considered to be relevant are included for completeness.

2. Matter 6 – Housing Supply and Delivery

Issue: Is the overall housing supply and delivery assumptions justified, effective and in accordance with the Core Strategy?

Policy OVE1 Housing Supply and Delivery Pending Plans

1. **Will the proposed allocations and other provisions ensure that the Core Strategy requirement of at least 5,700 net additional homes over the period to 2028 will be met?**
 - 2.1. The Rother Core Strategy sets a requirement for at least 5,700 net additional homes over the plan period. This requirement is carried through into policy OVE1 of the DaSA. It is important to note that the Core Strategy sets a minimum requirement, with no upper limit being defined. Paragraph 8.7 of the DaSA sets out that, in accordance with the April 2018 Housing Land Supply Position Note, 1,324 dwellings have been completed and a further 2,469 dwellings have been granted permission.
 - 2.2. Paragraph 8.6 of the DaSA sets out that there is a requirement to identify sites for a further 1,574 net additional dwellings through the DaSA and Neighbourhood Plans to meet the residual Core Strategy requirement over the plan period (to 2028). Of these 1,574 dwellings, it is proposed that at least 1,029 are planned for through the DaSA, with the remainder to come forward through Neighbourhood Plans.
 - 2.3. Since the production of the DaSA, a more recent Housing Land Supply Position Note which provides the position at 1st October 2018 has been published. The October Note sets out that 1,437 dwellings have been completed and 2,572 dwellings have been granted permission to date. Based on these more updated figures, a total of 4,009 dwellings have been granted permission or have been completed over the plan period to date, leaving a residual requirement of at least 1,691 dwellings.
 - 2.4. Paragraph 8.7 of the DaSA also sets out that a windfall allowance of 225 dwellings and an allowance for 45 dwellings on rural exceptions sites can be applied, in line with the Core Strategy. These figures were correct as at April 2018, however the windfall allowance should be adjusted to account for the time that has elapsed since April. The October Position Statement sets out that the adjusted windfall allowance should be 203 dwellings, the rural exception allowance remains at 45 dwellings as no rural exception sites have been granted in the intervening period.
 - 2.5. During the examination of the Core Strategy the Inspector set out that the housing target should be a minimum, due to a shortfall of 30 dwellings per annum (dpa) against the district's Objectively Assessed Needs (OAN). In this context, it is our view that in order to be positively prepared, consistent with national policy and to provide sufficient flexibility to ensure that this minimum is met, accounting for non-delivery of sites, the windfall allowance and rural exception sites should not be counted towards this minimum target, rather they should be factored into the housing target as a buffer, over and above the minimum requirements, to account for any inevitable shortfall. As such, we believe that the residual requirement that should be met through the DaSA and Neighbourhood Plans is 1,691 dwellings, as set out in Table 2.1 on the following page.

Table 2.1 – Core Strategy Residual Requirement

A	B	C	G
Core Strategy minimum Requirement	Completions	Consents	Residual Requirement (excluding windfall and rural exceptions)
			A – (B + C)
5,700	1,437	2,572	1,691

- 2.6. Paragraph 8.12 of the DaSA sets out that 1,562 dwellings are allocated through the DaSA, against the DaSA target of 1,029 set out in paragraph 8.6. Paragraph 8.13 continues that 246 of these dwellings have effectively been 'double counted' as they are also included in figures for existing commitments, and therefore should be removed from the total to arrive at the net capacity of 'new' sites allocated through the DaSA. A total net capacity of 'new' sites is provided at the end of paragraph 8.13 of 1,381 homes, however this figure is incorrect. The number of total dwellings allocated through the DaSA of 1,562, minus the 246 'double counted' units equates to 1,316 dwellings on 'new sites' to be allocated through the DaSA.
- 2.7. In addition to this, we note that 24 dwellings recently granted permission comprise the BEX7 allocation, as such an additional 24 units have been double counted, resulting in a total 'new' provision of 1,292 units.
- 2.8. This is set out clearly in Table 2.2 below.

Table 2.2 – DaSA Provision

A	B	D	C	E	F	
Dwellings allocated through the DaSA	'Double Counted' units (as per para 8.13)	Net Provision of 'new' sites (as per para 8.13)	Actual net provision of new sites (A – B)	Difference between calculated net provision and stated net provision (para 3.13 (D – C))	Additional 'double counted' sites (October update)	Up to date net provision of new sites (C – F)
1,562	246	1,381	1,316	71	24	1,292

- 2.9. Taking into account the factors above, we consider that the DaSA and Neighbourhood Plans should provide at least 1,691 dwellings, the DaSA provides for 1,292 'new' dwellings and therefore a shortfall of 399 dwellings will remain against the Core Strategy target, over the plan period, should the DaSA be adopted as currently drafted.
- 2.10. Neighbourhood Plans of course, are also likely to contribute towards meeting the district's housing target, the anticipated contribution of Neighbourhood Plans is set out below.

- 2.11. RDC anticipate that Neighbourhood Plans will make up the shortfall against the residual Core Strategy target, which as demonstrated previously is 399 dwellings. Paragraph 8.10 of the DaSA identifies that only two Neighbourhood Plans have been made, for the settlements of Seddlescombe and Salehurst and Robertsbridge. A further three Neighbourhood Plans are at examination, these are for Rye, Ticehurst and Crowhurst, and a further four Neighbourhood Plans are being prepared for Battle, Burwash, Etchingham and Hurst Green.
- 2.12. The stages of each Neighbourhood Plan and the proposed housing allocations are set out in Table 2.3 below.

Table 2.3: Neighbourhood Plan Allocations

Neighbourhood Plan	Stage	Total Housing Allocations
Seddlescombe	Made	34 – 39*
Salehurst and Robertsbridge	Made	41 – 50*
Rye	Examination	107 – 152*
Ticehurst	Examination	25*
Crowhurst	Examination	30*
Hurst Green	Drafting	Unknown
Battle	Evidence gathering	Unknown
Burwash	Evidence gathering	Unknown
Etchingham	Evidence gathering	Unknown
Total		237 - 296

**Figures taken from RDC's Housing Land Supply Position Statement October 2018 and Inspector's Findings into Neighbourhood Plans*

- 2.13. As can be seen, Neighbourhood Plans are likely to account for between 237 and 296 additional dwellings over the Plan period, although it is noted that three of these Neighbourhood Plans are at examination and therefore there is no guarantee that they will deliver the proposed quantum of housing. If the lower estimate of 237 is taken, assuming that the three plans at examination are Made, the DaSA and Neighbourhood Plans would provide for an additional 1,529 dwellings over the plan period, this is against a residual Core Strategy target of 1,691 dwellings (assuming windfall and rural exception sites are excluded). As such a shortfall against the residual Core Strategy target of 162 dwellings will remain.
- 2.14. In light of this, it is not considered that the DaSA and other provisions (such as Neighbourhood Plans) will ensure that the minimum Core Strategy requirement of at least 5,700 dwellings will be met and therefore the DaSA is not considered to be positively prepared or consistent with national policy.
- 2.15. In addition, it is noted that the Housing Land Supply Position Statement as of October 2018 sets out the housing trajectory for the district over the remainder of the plan period. This trajectory shows a provision of just 2,084 dwellings over the next five years against a target of 2,692 (adjusted for previous under delivery and to include a 20% buffer in line with the HDT), with the majority of provision over the plan period weighted towards the last five years of the plan. Based on this trajectory, following the adoption of the DaSA, RDC will still not be able to demonstrate a five year supply of housing land, with projections as of October 2018 showing a supply of just 3.9 years. This is clearly not sound planning as it would not promote plan-led development within the district, would not be positively prepared, effective or consistent with national policy.

- 2.16. In light of this it is clear that additional suitable sites (including the St Francis Fields site) should be allocated through the DaSA that could be brought forward in the next five years so that, post adoption of the DaSA RDC are able to demonstrate a five year supply of housing land.
- 2.17. It is also directly relevant that, although the DaSA is required to conform to the housing requirements set out in the Core Strategy, the Core Strategy will become out of date in September 2019.
- 2.18. In accordance with Paragraph 73 of the NPPF:
- “Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old”.*
- 2.19. Therefore, in September 2019, RDC’s housing target is likely to increase from the 335 dpa set through the Core Strategy to the local housing need target of 469 dpa (based on the 2014 household projections). In addition, we are aware that affordability ratios have recently been updated. Based on Savills’ calculations, the effect of these updates will be to increase RDC’s housing need to 803 dpa, whilst it is noted that a 40% cap on the existing housing target will be applied and therefore Rother’s target will remain at 469 dpa, it is clear that the need in the district is far greater.
- 2.20. It is acknowledged that the DaSA should conform to the Core Strategy, and therefore the housing targets that are set therein, however the increase in RDC’s housing target and dramatic increase in need likely to take place in the coming months should not be ignored. As a result of this imminent increase in RDC’s housing target, it is even more important that the minimum Core Strategy target is met through the DaSA, with sufficient flexibility for non-delivery of sites, to ensure that the housing needs of the district are met and to allow for the impending significant uplift in housing need in the district.
- 2.21. In addition, it is relevant that the recently published Housing Delivery Test (HDT) measure indicates that RDC have consistently under-delivered against their Core Strategy housing requirement for the past three years, delivering just 697 dwellings against a target of 1,008 dwellings, a rate of 69%. In light of this under-delivery, it is even more important that sites allocated through the DaSA meet the minimum Core Strategy requirement to allow for future under-delivery and the non-implementation / completion of sites, for which there is a clear trend within the district.
- 2.22. Accounting for the considerations above, it is evident that the DaSA and Neighbourhood Plans should make provision for at least the residual requirement of 1,691 dwellings. Rother have persistently under-delivered housing as set out in the HDT measure, Rother’s housing target will increase by circa 134 dpa from September 2019 onwards and it is unlikely that all allocated or permitted sites will come forward as planned. Windfall and rural exception sites could go some way to providing a suitable buffer to account for these considerations and provide flexibility over and above the minimum Core Strategy requirement, but should not be relied upon to meet the minimum residual Core Strategy requirement.

2.23. Consequently, based on the DaSA allocation of 1,292 'new' dwellings and the Neighbourhood Plan provision of 237 dwellings, a shortfall against the residual Core Strategy target of 1,691 dwellings of 162 dwellings will remain (excluding windfall and rural exception sites). Therefore, as a minimum, additional sites to deliver a further 162 dwellings should be allocated through the DaSA in order to ensure that it is positively prepared, provides sufficient flexibility for the considerations outlined previously, and is consistent with national policy.

2.24. Furthermore, the proposed housing trajectory set out by RDC in the latest Housing Land Supply Position Statement, demonstrates that post adoption the DaSA would not provide sufficient site for RDC to demonstrate a five year housing land supply. This is not sound planning as it is not justified, effective, positively prepared or consistent with national policy, consequently, additional sites should be allocated that can be brought forward in the next five years, to ensure that RDC can demonstrate a five year housing land supply and therefore that the plan is sound.

2. Is the proportional split of site and expected provision between areas of the borough consistent with the targets, strategic objectives and spatial policies of the Core Strategy?

2.25. The proportional split of sites between areas of the district is considered to be broadly consistent with the strategic objectives and spatial policies of the Core Strategy, according with the spatial distribution of sites set out in Figure 8 of the Core Strategy and broadly according with the distribution of rural housing set out in Figure 12 of the Core Strategy. It is considered that a greater number of dwellings should be allocated to provide the necessary flexibility. Specifically a greater number of units should be attributed to the village of Northiam. Northiam is identified as a Local Service village in the Core Strategy, however it is comparable in size and range of services offered to the two Rural Service Villages of Robertsbridge and Ticehurst.

2.26. This is, in part reflected in the housing target for Northiam which is greater than many of the other Local Service villages, however given the size of the village, the facilities it offers and the availability of suitable brownfield sites, such as St Francis Fields, which, if developed would contribute towards the strategic objective of the Core Strategy to meet local needs, support rural economies and achieve a sustainable pattern of development, it is considered that additional sites should be allocated within the village.

3. Are the assumptions for the contribution of small sites in Figure 16 reasonable and justified by the evidence?

2.27. The assumptions for small site contributions in the period 01/04/23 to 31/03/2028, as set out in the small site windfall column of Figure 16 of the DaSA appear to be justified by the evidence and therefore are not disputed.

2.28. Notwithstanding this, a reliance on a windfall allowance which, although justified cannot be guaranteed to meet the minimum Core Strategy requirement is not considered to be a sufficiently robust approach. Rather, as set out previously in this Statement, we suggest that the windfall allowance should be utilised only as a buffer, over and above the minimum residual Core Strategy requirement, should allocated sites, or Neighbourhood Plans not come forward as expected. The use of the windfall allowance for such a purpose would provide a greater degree of certainty that the minimum Core Strategy target of at least 5,700 dwellings over the plan period will be met, and will therefore help to ensure a positively prepare plan that is consistent with national policy.

4. Are the assumptions for the delivery of sites with planning permission by 2028 justified? In Particular in Bexhill large sites such as Worsham Farm and Preston Hall Farm have yet to commence according to the Housing Land Supply Document of October 2019, yet have capacity for nearly 1,300 dwellings?

2.29. The Blue Cross do not have any comments in relation to this question.

5. Does the residual requirement for Battle of 475-500 dwellings exclude the Rother District Plan 2006 allocated site of Blackfriars?

2.30. The Blue Cross do not have any comments in relation to this question.

6. Are there sufficient safeguards and provisions in place in the policy to ensure that the requirement would be met if the preparation of and making of neighbourhood plans delayed or frustrated?

2.31. As set out previously in this Statement, we do not believe that sufficient allocations have been made through the DaSA to ensure that the minimum Core Strategy requirement will be met.

2.32. Two Neighbourhood Plans (Seddlescombe and Salehurst and Robertsbridge) make site allocations and have been adopted, a further three Neighbourhood Plans (Rye, Ticehurst and Crowhurst) which make allocations are at examination, and therefore a degree of certainty with regard to the housing numbers that these plans allocate can be applied. The contribution that these Neighbourhood Plans are likely to make towards housing in the district is set out in Table 2.3 previously, totalling between 237 – 296 dwellings. However, a further four Neighbourhood Plans are at the initial stages of preparation, and no indication has been provided as to whether they will allocated sites or how many sites they will allocate, if they seek to do so. As such, no reliance can be placed on delivery from these Neighbourhood Plans. Therefore, if a conservative estimate is taken, the delivery of only 237 dwellings can be relied upon through Neighbourhood Plans.

2.33. As set out previously in this statement, when this is added to the allocation of 'new' sites through the DaSA, which total 1,292 dwellings, a degree of certainty is only provided for 1,529 dwellings, this is against a residual Core Strategy target of 1,691 dwellings (excluding windfall and rural exception sites). As such a shortfall against the residual Core Strategy requirement of 162 dwellings will remain, this is clearly not a sound approach and will not ensure that the residual requirement is met, especially if the making of Neighbourhood Plans is delayed or frustrated.

2.34. It is our view that, as the Core Strategy target is a minimum, in order to be consistent with it, and to ensure that sufficient flexibility is built into the DaSA for the non-delivery of sites, delays to Neighbourhood Plans, the imminent uplift in Rother's housing need and the previous under-delivery of housing in the district, allocations for at least the full residual target of 1,691 dwellings should be made.

2.35. It is accepted that 1,529 dwellings are likely to be provided for through the DaSA allocations and advanced Neighbourhood Plans and therefore at least a further 162 dwellings should be allocated though the DaSA. This would provide a sufficiently robust figure with windfall allowance and rural exceptions sites, which are expected to total 248 dwellings but which cannot be guaranteed, to be used as a buffer to ensure that the residual Core Strategy requirement is met in the event that the development of site allocations and Neighbourhood Plans do not come forward as anticipated.

