

# HOUSING DELIVERY TEST ACTION PLAN

2019 MEASUREMENT



**Rother District Council**  
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# 1 Introduction

## Background

- 1.1 National Government is committed to the improved delivery of new homes nationally through their economic and housing growth agendas. To this end they have introduced 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. The allocation of land to accommodate some 1,562 new homes, outside of designated Neighbourhood Areas, has been made through the Development and Site Allocations (DaSA) Local Plan. These sites were allocated against an outstanding Core Strategy housing target of at least 1,029 dwellings to be met through the DaSA. A further 545 dwellings through are required to be allocated through Neighbourhood Plans. The adoption of the DaSA was one of the key actions from the previous Housing Delivery Test (HDT) Action Plan<sup>1</sup> and was adopted at full council on 16 December 2019.
- 1.3 The HDT has been introduced by the Government 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;

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<sup>1</sup> Published July 2019.

- Where delivery has been less than 85% of the housing requirement, a 20% buffer should be applied to the supply of deliverable sites for the purposes of housing delivery assessment;
  - Where delivery has been less than 75% of the housing requirement, the NPPFs presumption in favour of sustainable development will apply.<sup>2</sup>
- 1.4 Where an Action Plan is required, this should be prepared within six months of the test results being published.
- 1.5 The 2019 Housing Delivery Test measurement covers the three-year period from 1 April 2016 to 31 March 2019. This Action Plan responds to this (2019) Housing Delivery Test measurement.
- 1.6 As the adopted housing requirement in Rother District is less than five years old for this period (the Core Strategy was adopted in September 2014), the district's HDT has been assessed against the Core Strategy average annual housing figure of 335 dwellings.
- 1.7 In February 2020 the Government published the HDT results for the 2019 Measurement. Against a requirement of 1,006 dwellings over the last three years, Rother delivered 706 net dwellings with a result of 70%. Consequently, the Council is required to produce this Action Plan, as well as include a 20% buffer in its five-year housing land supply position statement.

## **Purpose, objectives and status**

- 1.8 This Action Plan provides an analysis of the key reasons for the historic under-performance against the district's housing requirement and identifies the measures the Council intend to undertake to increase the delivery of new housing in Rother district.

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<sup>2</sup> A three-year transitional period will operate from November 2018. In 2018 the threshold will be delivery below 25% of the housing required over the previous three years, rising in 2019 to 45% and then 75% in 2020. For further information see: <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

- 1.9** The Council recognises that delivering growth is complex. Whilst a number of the actions identified in this Action Plan are solely within the remit of the Council to resolve, to successfully respond to the challenge of increasing, and then maintaining, housing delivery the Council will also need the support and co-operation of those involved in delivering homes including landowners and house builders.

## **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:
- [Local Plan Core Strategy](#) – Part 1 of the Local Plan, the Core Strategy sets out the vision and overall spatial strategy for the district. This includes providing the framework for future housing and sets district targets for the numbers of additional homes over the period 2011 - 2028.
  - [DaSA Local Plan](#) – Part 2 of the Local Plan, the DaSA allocates sites in order to deliver, and give spatial expression to, the housing targets set out in the Core Strategy.
  - [Rother District Local Plan 2006](#) - Whilst the Core Strategy and DaSA have largely superseded the policies in the earlier 2006 Rother District Local Plan, there remains a few exceptions; mainly site allocations within designated Neighbourhood Areas where a Neighbourhood Plan is yet to be 'made'.
  - [Neighbourhood Plans](#) - There are five 'made' Neighbourhood Plans in the District. These are in the Parishes of Sedlescombe, Salehurst and Robertsbridge, Ticehurst, Rye and Crowhurst. Each of the plans allocates sites in order to be in conformity with the targets of the Core Strategy. In addition, there is the Burwash Neighbourhood Plan which has conducted the Regulation 14 pre-submission consultation. Rother also has three other Neighbourhood Plans which are still in preparation for the Neighbourhood Areas of Battle (including Netherfield), Etchingham and Hurst Green.

- [Rother District Council Corporate Plan 2014 - 2021](#) - The Councils Corporate Plan also includes strategic Core Aims themed around housing delivery. This includes the promotion and support of affordable housing, improvements to private housing stock and the prioritisation of the delivery of the Councils major housing allocations. The Councils Corporate Plan is currently in the process of being reviewed.

## **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.

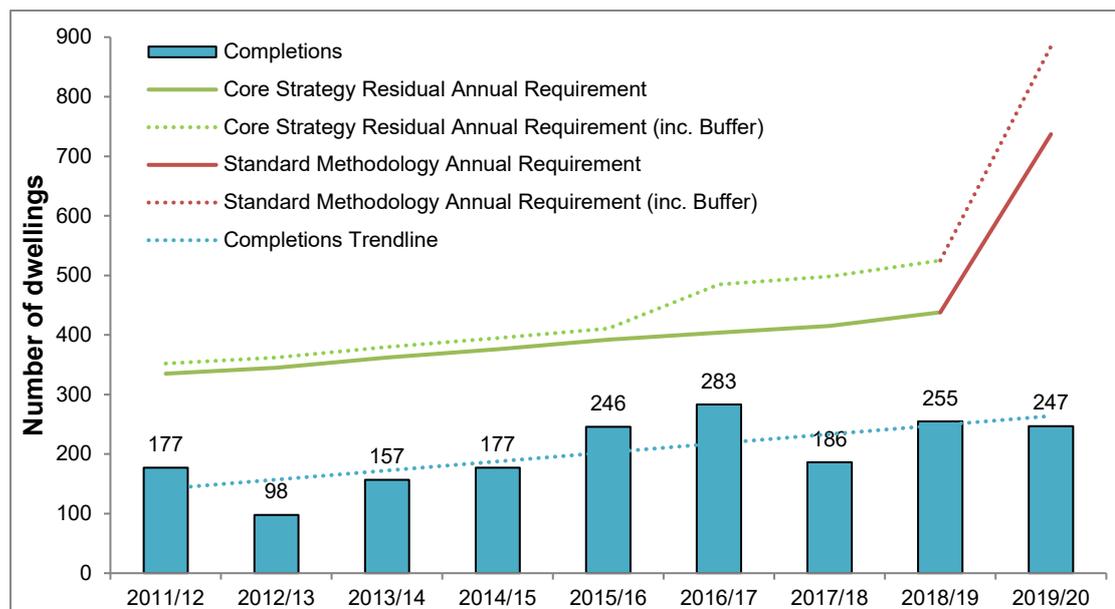
## 2 Housing Delivery Analysis

### Housing supply needs and delivery

#### Dwelling Completions

- 2.1 Since the start of the Core Strategy plan period in April 2011, there have been 1,826 net additional dwellings completed (as at 1 April 2020); an average of only 203 dwellings per year.
- 2.2 In terms of performance against the Core Strategy housing requirement, there have been 1,192 dwelling completions fewer than the Core Strategy annualised requirement of 3,018 dwellings for this point in the Plan period.

*Figure 1: Comparison of dwelling completions and requirements (2011/12 - 2019/20)*



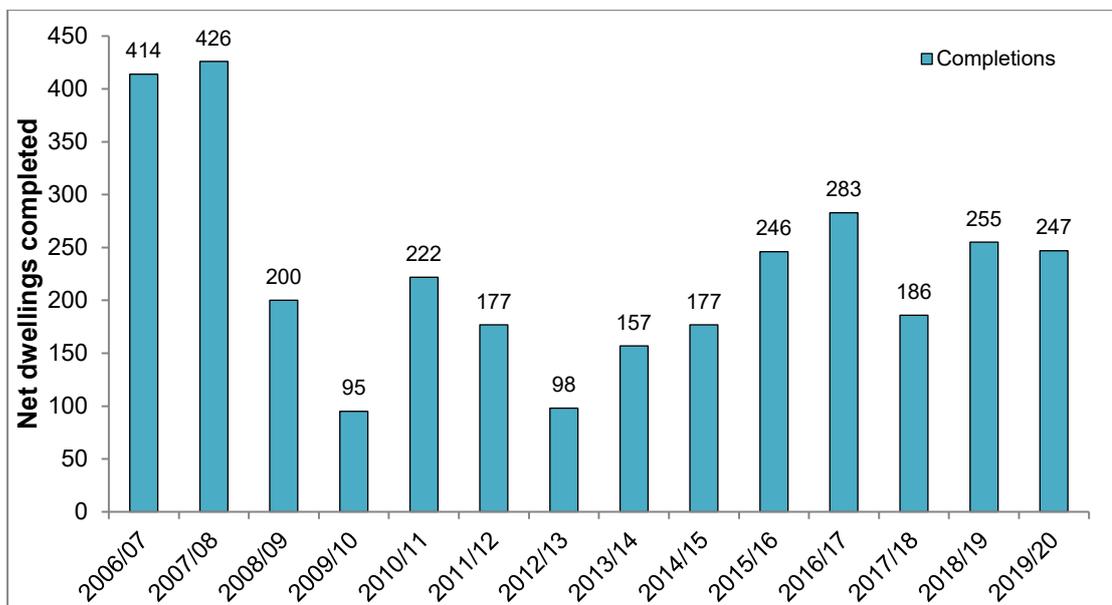
- 2.3 Though the annual housing requirement has not yet been achieved at any year during the plan period, Figure 1 shows an upward trend in the number of dwellings being completed each year. Indeed, completions have averaged some 229 dwellings per annum over the past three years, which is an increase of approximately 13% over the average for the plan period as a whole.

2.4 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.

2.5 As the Core Strategy is now more than five years old, the new standard method for assessing housing need<sup>3</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 727 dwellings per annum as at 1 April 2019, this then rises to 736 dwellings<sup>4</sup> per annum as at 1 April 2020 as set out in the standard method calculation. This is the reason for the steep increase in housing requirement from the adopted 335 dwellings per annum shown in Figure 1.

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

**Figure 2: Net additional completions (2006/07 - 2019/20)**



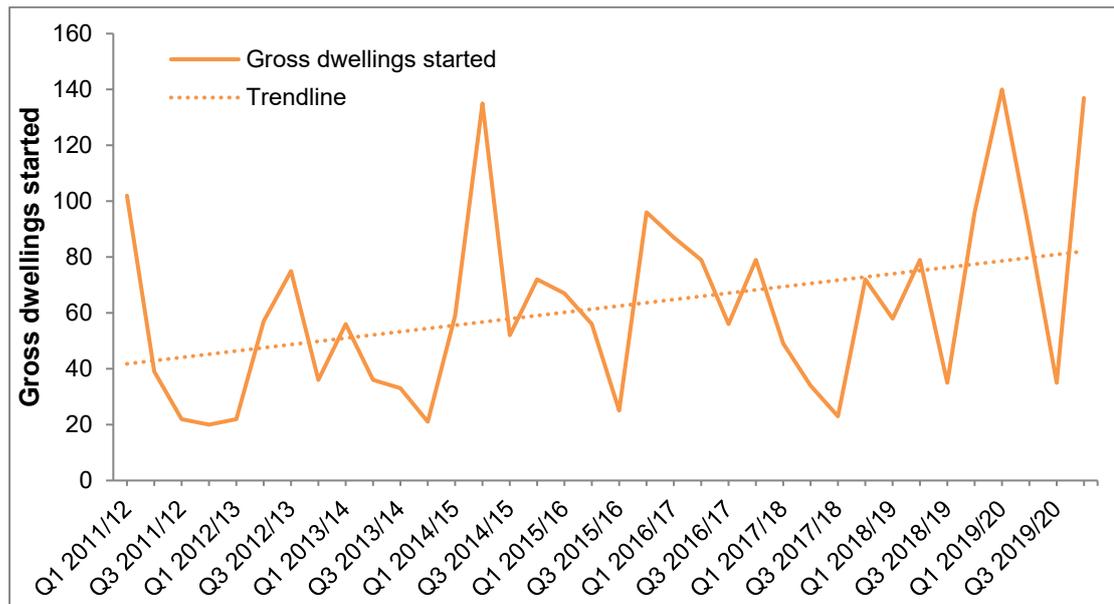
<sup>3</sup> <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

<sup>4</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.

## Dwelling Commencements

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

*Figure 3: Gross dwelling commencements (2006/07 - 2019/20)*

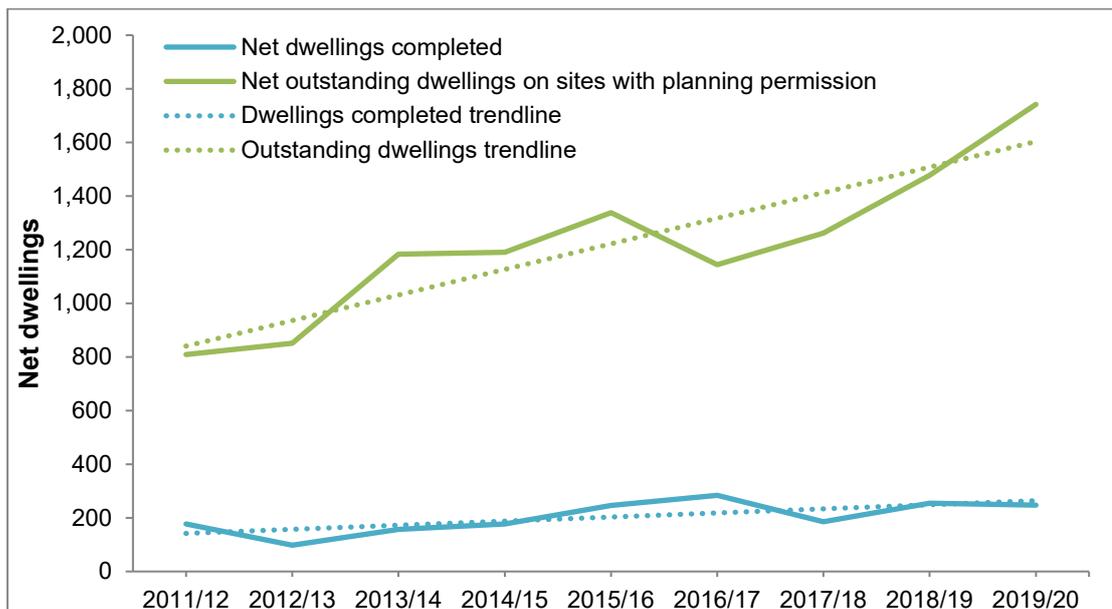


## Planning Permissions

- 2.8 As of April 2020, the number of outstanding dwellings on large sites (6+ net dwellings) with planning permission is 2,551, which is an increase of some 220% from the April 2011 figure of 798.
- 2.9 In addition, there are a further 272 outstanding dwellings on small sites (less than 6 net dwellings) with planning permission, making a total of 2,823 dwellings with planning permission (or with delegated approval subject to completion of a Section 106 agreement).

2.10 Rates of completions however, have not been significantly impacted by the marked increase in the number of permitted dwellings. Excluding the site at Worsham Farm, which was approved in March 2016 for 1,050 dwellings, Figure 4 shows that while both the number of permitted dwellings and the number of dwelling completions show 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.

*Figure 4: Comparison of outstanding dwellings on sites with planning permission (excl. Worsham Farm) and number of dwellings completed (2011/12 - 2019/20)*

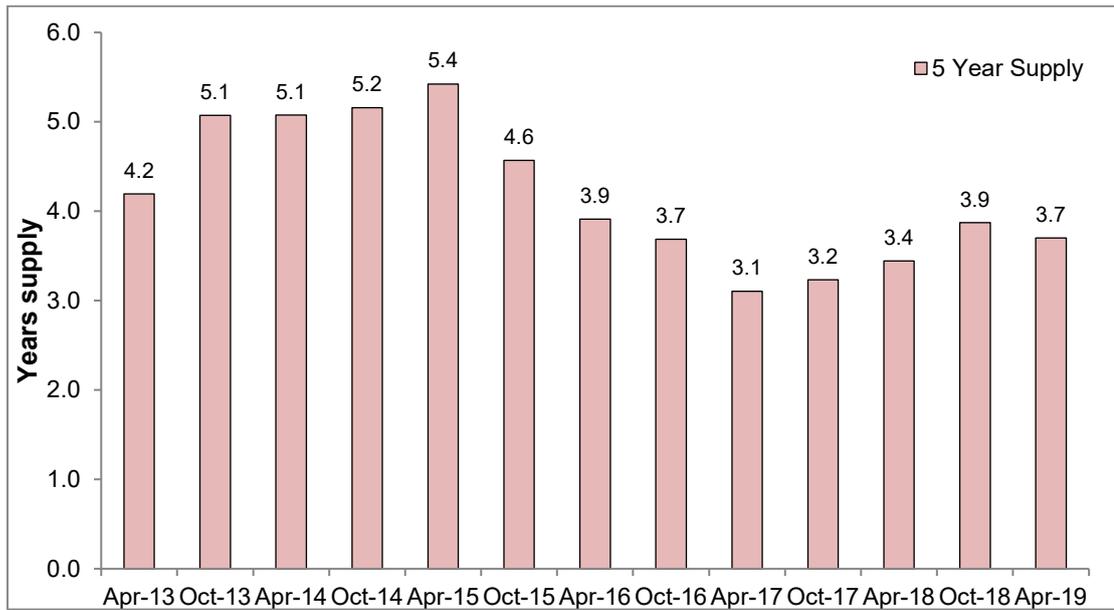


### Five-year Supply

2.11 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.

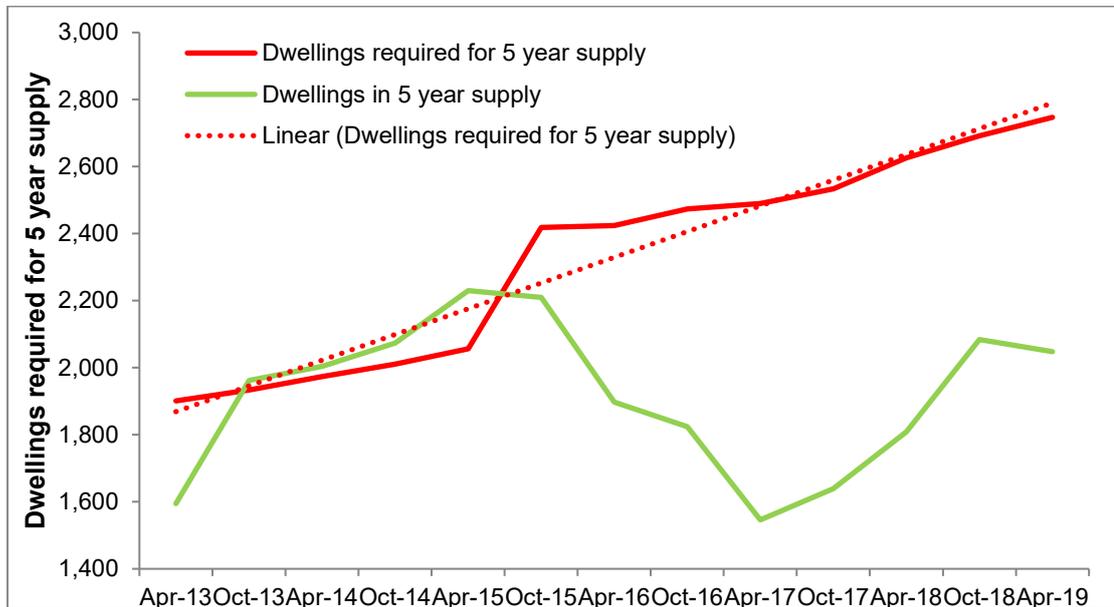
2.12 From the end of September 2019, the Core Strategy will become more than five years old. Consequently, the housing figure to be included for the purposes of determining the five-year supply will be taken using the new standard method for assessing Local Housing Need, until a new housing requirement is established through the Local Plan update.

**Figure 5: Five-year supply (April 2013 - April 2019)**



2.13 Figure 6 shows how the number of dwellings required to be deliverable within five years has increased, with a noticeable jump in October 2015, when the 5% buffer increased to 20%. This contrasts to the number of dwellings in the five-year supply, which shows an equally noticeable slump in October 2015.

**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 2019)**



## Local housing market and development activity

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

### Infrastructure – Roads

- 2.16 One significant factor in the increase of outstanding permissions since 2011 is the granting of planning permission in April 2016 for some 1,050 dwellings at Worsham Farm in North East Bexhill (some 43% of the total number of outstanding permissions at April 2018). The granting of permission and delivery of this site was dependent upon the construction of the Bexhill to Hastings Link Road (Combe Valley Way) and the Gateway Road (Mount View Street) which was completed in winter 2015. This was also recognised by Inspector conducting the examination of the Core Strategy from 2012 to 2014, as reflected in her Inspectors report and through Core Strategy policies BX3, TR1 and EC2. Prior to this outline application, Worsham Farm was allocated in the 2006 Local Plan for 980 dwellings as part of Policy BX2. It was originally envisaged that the Link Road would be completed in the first half of 2010.
- 2.17 Beyond the Worsham Farm site, Infrastructure – specifically roads, has been a significant factor in delays to larger sites:
- Preston Hall Farm, 139 dwellings – Part of the 2006 Local Plan BX2 allocation, in North East Bexhill. Delivery was dependent on the completion of the Bexhill to Hastings Link Road. Planning permission was granted in August 2018 and Persimmon Homes commenced the development in March 2019.
  - Blackfriars – Allocated in Policy BT2 of the 2006 Local Plan for at least 220 dwellings. Delivery of the site is dependent on the construction of a new spine road. Delegated approval was granted in October 2019 subject to the completion of a Section 106 agreement.

### Infrastructure - Wastewater

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

### Landowner Expectations

- 2.19 The most common reason for slippage of site delivery is land-banking by landowners, in order to achieve their expectations on value. This has been identified as a major factor in around half of sites (of 6 or more net dwellings) analysed. This issue is exacerbated by a significant proportion of sites being in multiple land ownership, meaning that there is a high degree of complexity to site assembly for developers to bring these sites forward.
- 2.20 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

- 2.21 In comparison with other Councils, RDC does not own a significant proportion of land that is suitable for housing. This limits its options to be proactive in the promotion of housing delivery, although where the Council does own land with housing potential, it will seek to bring those sites forward.
- 2.22 It should be noted that the Council is considering the formation of a Local Housing Company 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 under Responses and Key Actions below.

## Demand side issues

### The Letwin Review

- 2.23 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.
- 2.24 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

- 2.25 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 8: Median and lower quartile affordability ratios (2019)*

| Geography   | Median | Lower quartile |
|-------------|--------|----------------|
| England     | 7.83   | 7.27           |
| South East  | 9.74   | 10.18          |
| East Sussex | 9.54   | 10.31          |
| Hastings    | 9.25   | 8.62           |
| Rother      | 9.83   | 11.83          |

Source: East Sussex in Figures

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

## Summary

- 2.26 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.
- 2.27 Although the absorption rate problem is a very important factor of build out rates nationwide, consideration of Rother's permissioned or allocated housing sites gives a somewhat different conclusion to the outcomes of the Letwin Review analysis. Where the problem of land-banking is assessed to be a function of volume housebuilders, our evidence sees land-banking to feature more often as an action of landowners themselves. This is likely due to the fact that the majority of approved sites in Rother are of a more 'medium size', and therefore constitute a different typology from those typically employed by the volume housebuilders.
- 2.28 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. It should be noted that the Blackfriars site has now received outline planning permission (subject to successful completion of a Section 106 agreement) and has Housing Infrastructure Fund (HIF) funding for the construction of the spine road to serve the development.

## **Potential impacts of COVID-19 on future housing delivery**

- 2.29 The ongoing COVID-19 pandemic has had, and is likely to continue to have, a significant impact on housing delivery in Rother.
- 2.30 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 lockdown. As a result, it should be expected that housing completions for the coming year will be lower than they would have otherwise been and may damage the modest upward trend in commencements and completions shown in Figures 1 and 3.

- 2.31 There are also signs that the housing market itself has been depressed. The consequences of this decreased demand for housing will mean that some developers may delay their plans to bring forward their sites, until sales and prices pick up again.
- 2.32 In terms of the impact on the districts Housing Delivery Test results, it is likely that the 2020 measurement, expected to be published in November 2020, will be only slightly affected by these issues. However, the 2021 measurement may be more severely affected depending on how housing sites are developed in the coming months, although it is acknowledged that national changes have been made to respond flexibly to extended construction hours on sites.

### 3 Responses and Key Actions

#### Housing Issues Task and Finish Group recommendations

- 3.1 The HIT&FG recommended the following actions to promote a sufficient and continuous housing land supply:
- a. Giving priority to completing the Development and Site Allocations Plan and the production of Neighbourhood Plans, taking account of revised National Planning Policy Framework.
  - b. An early review of the Local Plan (Core Strategy) be prioritised, taking account of revised National Planning Policy Framework especially given Government's likely expectation of substantially more housing.
  - c. Consideration be given to allowing exception site planning policy to allow for an element of market housing to cross subsidise where viability is an issue, taking account of revised National Planning Policy Framework.
  - d. Identification of more "small site" development opportunities, including for custom and self-build housing, possibly working with smaller developers within a public/private partnership.
  - e. 'Unblocking' of sites where physical infrastructure and/or ownership factors present a major constraint to development including by:
    - working to find strategic drainage, utilities and digital broadband solutions to support major developments, working with utility companies and respective developers;
    - seeking financial support from Homes England and other Central Government growth funds;
    - working proactively to bring forward development on sites where the Council has a landholding interest;
    - proactively negotiating with developers and landowners to bring forward key development sites; and
    - consideration, as a last resort, of pursuing Compulsory Purchase Orders, being mindful of local sensitivities.
  - f. Continuing to invest in strategically important infrastructure projects that boost the market attractiveness of places where growth is planned, potentially including, for example, the development of GP surgeries.

- g. Promoting higher water efficiency standards through the Local Plan as well as exploring the opportunity of introducing ‘recycled water’ within planning applications, subject to consistency with national requirements and viability considerations.
- h. Introduce and deliver a Landowners Forum, to take place once every two years, to encourage communication and promote housing development.
- i. Prepare a housing delivery “Action Plan” in response to the new Housing Delivery Test and taking full account of the above, in light of revised National Planning Policy Framework.

## Policy responses through the DaSA Local Plan

3.2 In 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 on such sites, in order to cross-fund the affordable housing.

- **Policy DRM1: Water Efficiency**

As Rother has been identified as an area of ‘serious water stress’, there was a clear need for water efficiency measures to be addressed in planning policy. In relation to this, the Proposed Submission DaSA contains **Policy DRM1: Water Efficiency**, which requires that all new dwellings must meet the higher optional building regulations standard of water consumption, this being: no more than 110 litres of water per person per day. Furthermore, the Rother Local Plan Viability 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.

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

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

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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 While not a DaSA policy, the issue of GP surgeries also relates to the development at Barnhorn Green (RR/2015/3125/P) where the Council has purchased land to bring forward a GP surgery.
- 3.4 Moreover, a general theme of the DaSA's allocations accords with the overall conclusions of the Letwin Review and the HIT&FG Report, in respect of the need to broaden the local housing offer in order to speed up the 'absorption rate' at which new homes can be sold into the market. Coinciding with this analysis, particularly regarding the homogenising overreliance on large site developments, paragraph 68a of the NPPF (2019) requires local planning authorities to "identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare..."
- 3.5 Towards this end, of 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.
- 3.6 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

- 3.7 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 8 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.
- 3.8 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 Summer 2021. A revised Local Development Scheme will be published in due course.

- 3.9 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.
- 3.10 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. Internal engagement with Members has been 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.
- 3.11 In terms of key evidence base documents, several studies have been commenced to support the Local Plan Update, including:
- 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 Form and Function Study** 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 and provide an overview of their existing level of sustainability.
  - A **Settlement Constraints Study** which will analyse the physical and environmental constraints that may affect potential settlement capacity, concluding on key areas of search for development that can be undertaken in detail through the HELAA process.
  - A **Housing and Economic Land Availability Assessment (HELAA)** which will include a Call for Sites in the near future and will help to identify a future supply of land in the District which is suitable, available and achievable for housing and economic development.
  - 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.

## **Proactively investing in infrastructure**

- 3.12 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. Outline planning permission (subject to successful completion of a Section 106 agreement) has now been granted for the road and up to 220 dwellings and the site is now expected to be delivered within the next five years.
- 3.13 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. It has also enabled the delivery of the Councils major employment sites at Glovers Farm, Worsham Farm and Buckholt Lane in Bexhill, which will provide some 62,500sqm of employment floorspace when completed.

## **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 would show a real commitment to building and improving homes across the district.
- 3.15 It would 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.
- 3.16 As such, it was decided at full Council in December 2019 to proceed with the establishment of Local Housing Company.

- 3.17 The programme should initially aim 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.

## **Developer engagement**

### Worsham Farm

- 3.18 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).
- 3.19 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. Phase 1 also includes the delivery of key infrastructure required to develop the future phases.

### Preston Hall Farm

- 3.20 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.

### Landowners Forum

- 3.21 Going forward the LPA will set up a 'Landowners Forum' that meets every two years, as per the recommendations of the HIT&FG report.

## Summary of Key Actions

- 3.22 Given the Government's expectations to increase housing delivery, progressing the Local Plan Update will be prioritised. In order to identify the potential capacity for new development, there will be a focus on producing the evidence to support the Local Plan update, including a new HELAA, which will encompass a call for sites.
- 3.23 Reviewing this Action Plan with a view to incorporating feedback from further developer and stakeholder engagement is also seen as a high priority, along with the implementation and findings of the Landowners Forum.
- 3.24 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  | Measure of Success  | Timetable                 | Priority | Status      |
|-------------------|--|---|---------------------------|----------|-------------|
| Adopt the DaSA    | Submission of DaSA for Examination   | DaSA submitted to Secretary of State for Examination                          | January 2019              | High     | Complete    |
|                   | Conclusion of DaSA Examination Public Hearings                             | Confirmation from Inspector of Modifications necessary to make the DaSA sound | July 2019                 | High     | Complete    |
|                   | Drafting of DaSA Modifications incorporating recommendations of the HIT&FG | Approval of DaSA Modifications by Cabinet                                     | July 2019                 | High     | Complete    |
|                   | Consultation on the Modifications to the Proposed Submission DaSA          | Submission of Main Modification consultation representations to the Inspector | July - September 2019     | High     | Complete    |
|                   | Conclusion of DaSA Examination   | Publication of Inspectors Report  | November 2019             | High     | Complete    |
|                   | Adoption of the DaSA   | DaSA adopted at Full Council  | December 2019             | High     | Complete    |
| Local Plan Update | Stakeholder Engagement and Evidence Gathering                              | Meeting Local Development Scheme (LDS) milestone                              | Winter 2019 – Summer 2020 | High     | In Progress |
|                   | Publish a new LDS  | Publication of a new LDS  | Summer 2020               | High     | In Progress |
|                   | HELAA/Call for sites   | Commencement of call for sites  | Autumn 2020               | High     |             |
|                   | Draft Plan Consultation  | Meeting LDS milestone   | Summer 2021               | High     |             |
|                   | Pre-submission Publication Consultation                                    | Meeting LDS milestone   | Autumn 2021               | High     |             |
|                   | Submission   | Local Plan Review submitted to Secretary of State for Examination             | Winter 2021               | High     |             |
|                   | Examination  | Publication of Inspectors Report  | Spring 2022               | High     |             |
| Adoption          | Local Plan Review adopted at Full Council                                  | Summer 2022   | High                      |          |             |
| Action Plan       | Review this Action Plan  | Publication of 2020 Action Plan   | November 2020 - May 2021  | Medium   |             |
| Land-owners Forum | Set up Landowners Forum  | Hold Landowners Forum   | Early 2021                | High     |             |