



Housing Land Supply

incorporating Housing Trajectory

April 2020 position statement



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1. Introduction

- 1.1. This report presents information about housing completions, commitments and requirements as at 1 April 2020. As such, it meets the National Planning Policy Framework¹ (NPPF) requirement to annually monitor housing delivery and it provides guidance to Planning Committee, Planning Officers, developers and interested parties on the current supply of deliverable sites.

Summary

- 1.2. As the adopted Local Plan Core Strategy is now more than five years old², in accordance with the NPPF published in February 2019, the Council will measure its five-year housing land supply position against its minimum local housing need (LHN), defined using the new standard method calculation, until such time as a new target is established through the Plan-Making process.
- 1.3. As at 1 April 2020, the LHN figure for Rother is 736 dwellings per annum. This is in sharp contrast to the Core Strategy figure of 484 dwellings per annum for this point in the Plan period.
- 1.4. Due to the considerable uplift in the housing figure, the Council is only able to identify 2.87 years of housing supply. It should be noted however, that if the five-year housing land supply position were still measured against the outstanding Core Strategy requirement, then the Council would be able to demonstrate 4.36 years of housing land supply, an increase of 0.63 years since April 2019.
- 1.5. Notwithstanding this, it is concluded that there is currently an insufficient supply of deliverable housing sites to meet the five-year housing land supply requirement in accordance with paragraph 73, or a three-year housing land supply in accordance with paragraph 14c of the NPPF.
- 1.6. The general presumption in favour of sustainable development becomes a critical reference point when determining planning applications across the district. Significant weight should generally be given to the benefits that additional housing supply would bring, although this will depend to some extent on local circumstances, including the impact on the High Weald AONB.

¹ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

² Adopted 29 September 2014

2. Housing Completions

- 2.1. Between 1 April 2019 and 31 March 2020 there were 247 net additional dwellings built within the district. Figure 1 shows that there has been a total of 1,826 dwellings completed since 2011³, averaging 203 completions a year.

Figure 1: Net annual housing completions

Year	Net annual housing completions
2011/12	177
2012/13	98
2013/14	157
2014/15	177
2015/16	246
2016/17	283
2017/18	186
2018/19	255
2019/20	247
Total	1,826
Annual average	203

Large site completions

- 2.2. There were 191 dwellings completed on large sites (sites of 6 or more net dwellings) in 2019/20. Figure 2 shows that there has been a total of 1,311 large site completions since 2011, making up approximately 72% of total completions and averaging 146 dwellings a year.

Figure 2: Net annual housing completions on large sites

Year	Large site completions	% of total completions on large sites
2011/12	117	66%
2012/13	59	60%
2013/14	129	82%
2014/15	119	67%
2015/16	176	72%
2016/17	177	63%
2017/18	144	77%
2018/19	199	78%
2019/20	191	77%
Total	1,311	72%
Annual average	146	

³ The start of the Local Plan Core Strategy planning period.

Large windfall site completions

2.3. The NPPF defines windfall sites as:

“Sites not specifically identified in the development plan.”

For Rother, this means sites that have not been identified in the Rother District Local Plan (RDLP) 2006⁴, the Development and Site Allocations (DaSA) Local Plan⁵, a Neighbourhood Plan⁶ or the Strategic Housing Land Availability Assessment (SHLAA) 2013⁷.

2.4. The development plan in Rother only identifies large sites (sites of 6 or more net dwellings) and therefore, all small sites (sites of less than 6 net dwellings) are technically considered windfall sites.

2.5. There were 54 dwellings completed on large windfall sites in 2019/20. Figure 4 shows that there has been a total of 344 large windfall site completions since 2011, making up approximately 26% of large site completions and 19% of total completions, averaging 38 dwellings a year.

Figure 4: Net annual housing completions on large windfall sites

Year	Large windfall site completions	% of large site completions on large windfall sites ⁸	% of total completions on large windfall sites ⁹
2011/12	30	26%	17%
2012/13	21	36%	21%
2013/14	46	36%	29%
2014/15	10	8%	6%
2015/16	80	45%	33%
2016/17	32	18%	11%
2017/18	37	26%	20%
2018/19	34	17%	13%
2019/20	54	28%	22%
Total	344	26%	19%
Annual average	38		

⁴ <http://www.rother.gov.uk/rotherdistrictlocalplan2006>

⁵ <http://www.rother.gov.uk/dasa>

⁶ <http://www.rother.gov.uk/neighbourhoodplans>

⁷ https://www.rother.gov.uk/wp-content/uploads/2020/01/Strategic_Housing_Land_Availability_Assessment_June_2013_Tables_and_Maps_Final.pdf

⁸ This column shows the percentage of dwellings completed on large sites (excluding small sites) that were large site windfalls.

⁹ This column shows the percentage of dwellings completed on all sites (large and small sites) that were large site windfalls.

Small site completions

- 2.6. There were 56 dwellings completed on small sites (sites of less than 6 net dwellings) in 2019/20. Figure 3 shows that there has been a total of 515 small site completions since 2011, making up approximately 28% of total completions and averaging 57 dwellings a year.

Figure 3: Net annual housing completions on small sites

Year	Small site completions	% of total completions on small sites
2011/12	60	34%
2012/13	39	40%
2013/14	28	18%
2014/15	58	33%
2015/16	70	28%
2016/17	106	37%
2017/18	42	23%
2018/19	56	22%
2019/20	56	23%
Total	515	28%
Annual average	57	

Brownfield land completions

- 2.7. The NPPF defines brownfield land or ‘previously developed land’ as:

“Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.”

- 2.8. There were 107 dwellings completed on brownfield land in 2019/20. Figure 5 shows that there has been a total of 1,016 brownfield land completions since 2011, making up approximately 56% of total completions and averaging 113 dwellings per annum.

Figure 5: Net annual housing completions on brownfield land

Year	Brownfield land completions	Greenfield land completions	% of total completions on brownfield land
2011/12	70	107	40%
2012/13	61	37	62%
2013/14	123	34	78%
2014/15	152	25	86%
2015/16	172	74	70%
2016/17	132	151	47%
2017/18	66	120	35%
2018/19	133	122	52%
2019/20	107	140	43%
Total	1,016	810	56%
Annual average	113	90	

Affordable housing completions

- 2.9. There were 103 gross affordable housing completions in 2019/20. Figure 6 shows that there has been a total of 681 gross affordable housing completions since 2011, making up approximately 32% of gross total completions and averaging 76 gross dwellings per annum.

Figure 6: Gross annual affordable housing completions

Year	Gross affordable completions	Gross total completions	% of total completions as affordable
2011/12	70	203	34%
2012/13	13	123	11%
2013/14	58	168	35%
2014/15	129	205	63%
2015/16	58	291	20%
2016/17	104	315	33%
2017/18	66	249	27%
2018/19	80	307	26%
2019/20	103	277	37%
Total	681	2,138	32%
Annual average	76	238	

- 2.10. In terms of the split between affordable rented accommodation and shared ownership/intermediate housing, Figure 7 shows that there have been 58 units of rented accommodation and 45 units of shared ownership housing completed in 2019/20.

Figure 7: Tenure breakdown of gross annual affordable housing completions

Year	Affordable rented completions	Intermediate/shared completions
2011/12	54	16
2012/13	0	13
2013/14	46	12
2014/15	125	4
2015/16	16	42
2016/17	84	20
2017/18	44	22
2018/19	57	23
2019/20	58	45
Total	484	197
Annual average	54	22

3. Housing commitments

- 3.1. As shown in Figure 8, there are commitments for a total of 4,284 net additional dwellings on identified sites within Rother.

Figure 8: Total commitments at 1 April 2020

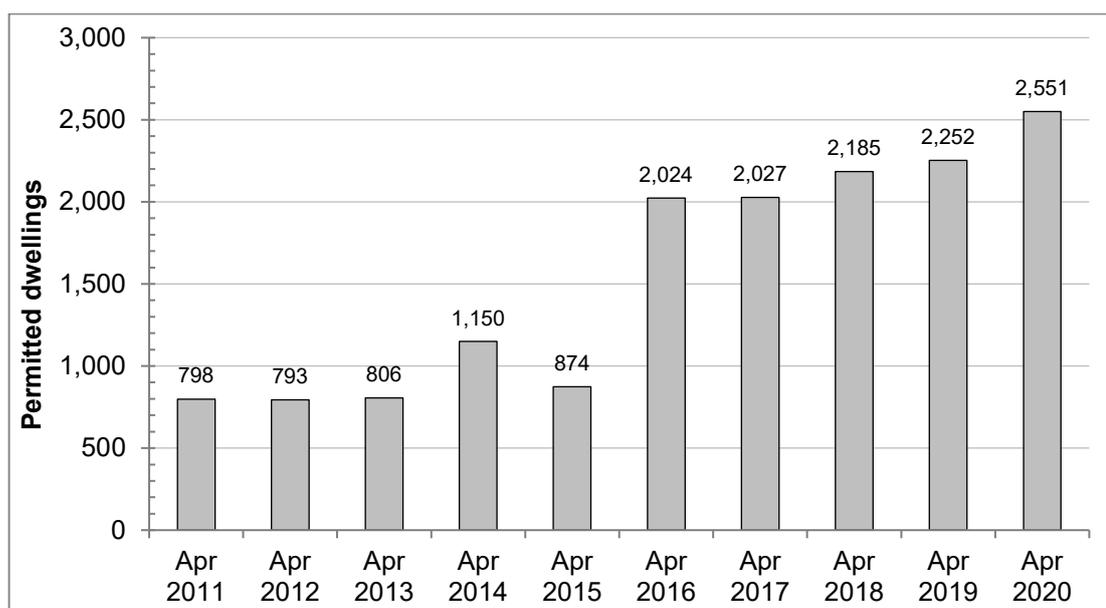
Commitments	No. of dwellings
Large site permissions ¹⁰ (inc. S106)	2,551
Small site permissions	272
DaSA Local Plan allocations	1,199
Neighbourhood Plan allocations	248
Total commitments	4,270

Sites with planning permission

- 3.2. As at 1 April 2020, there are 2,551 outstanding dwellings on large sites with planning permission (including sites that have a resolution to grant planning permission subject to the completion of an S106 agreement).
- 3.3. Figure 9 shows that there is a noticeable jump in outstanding dwellings on large sites in April 2016. This is due to the outline planning permission at Worsham Farm in North East Bexhill being granted for some 1,050 dwellings.

¹⁰ Including allocated sites that have been granted planning permission or that have delegated approval subject to completion of a Section 106 agreement.

Figure 9: Number of outstanding dwellings on large sites



- 3.4. Since then however, there has only been a slight upward trend in the number of permitted dwellings on large sites within the District.
- 3.5. The modest increase in permissions noted for this year is due to the Blackfriars site in Battle which has recently been granted permission for up to 220 dwellings.
- 3.6. Figure 10 provides a breakdown between the types of large site permissions.

Figure 10: Number of dwellings permitted on large sites, by type of permission

Type of planning permission	No. of dwellings	% of large permissions
Detailed permissions (Full + Reserved Matters)	899	35.2%
Outline permissions	1,085	42.5%
Resolutions to grant permission subject to S106	556	21.8%
Permitted Developments	11	0.4%
Total	2,551	100%

- 3.7. In addition to the large site permissions, there are a further 272 net additional dwellings on small sites with planning permission, bringing the total number of outstanding dwellings on sites with planning permission (including sites that have a resolution to grant planning permission subject to S106) to 2,823.
- 3.8. See Appendices 1 and 2 for a complete list of large site permissions.

Site allocations

- 3.9. Housing site allocations within Local Plans and made Neighbourhood Plans account for a further 1,447 housing commitments, as at 1 April 2020.
- 3.10. Figure 11 shows the number of dwellings on housing sites which have been allocated but have not yet received planning permission.

Figure 11: Number of dwellings allocated within Local and Neighbourhood Plans

Allocations	No. of dwellings
DaSA Local Plan allocations	1,199
Crowhurst Neighbourhood Plan allocations	30
Rye Neighbourhood Plan allocations	110
Salehurst & Robertsbridge Neighbourhood Plan allocations	46
Sedlescombe Neighbourhood Plan allocations	37
Ticehurst Neighbourhood Plan allocations	25
Total allocations	1,447

- 3.11. Figure 18 on page 114 of the DaSA Local Plan shows that there is a total of 1,562 dwellings on land allocated for housing sites. It should be noted however, that several of the DaSA allocations already had planning permission (or resolutions to grant planning permission subject to a S106 legal agreement) but were allocated because either a formal planning permission was not actually in place at the 1 April 2018 base date of the DaSA Local Plan or there were doubts about its implementation. Furthermore, several other of the DaSA allocations have been granted planning permission since the 1 April 2018 base date of the DaSA Local Plan.
- 3.12. DaSA allocations that have planning permissions (or resolutions to grant planning permission subject to completion of Section 106 agreement) at 1 April 2020 are shown in Figure 12 overleaf.
- 3.13. There are 10 designated Neighbourhood Areas within Rother District. They are the parishes of Battle, Burwash, Crowhurst, Etchingam, Fairlight¹¹, Hurst Green, Rye, Salehurst and Robertsbridge, Sedlescombe and Ticehurst.
- 3.14. Five of those parishes have Neighbourhood Plans that have passed Examination and been 'made'. These are the Crowhurst, Rye, Salehurst and Robertsbridge, Sedlescombe and Ticehurst Neighbourhood Plans.

¹¹ Although a designated Neighbourhood Area, Fairlight is no longer preparing a Neighbourhood Plan. Allocations in the parish have therefore been made in the DaSA Local Plan.

Figure 12: DaSA allocations with planning permissions/resolutions as at 1 April 2020

Policy	Site	Permission ref.	Permission type	Dwellings allocated	Dwellings permitted
BEX2	Land at Preston Hall Farm, Sidley, Bexhill	RR/2017/2441/P	Full	139	139
BEX4	Land at Former High School Site and Drill Hall, Down Road, Bexhill	RR/2019/430/P	Resolution subject to S106	35 - 54	52
BEX7	Land at Moleynes Mead, Fryatts Way, Bexhill	RR/2017/2452/P	Resolution subject to S106	24	24
BEX8	Land south of Terminus Road, Bexhill	RR/2018/2453/P	Outline	10	10
HAS2	Land at Michael Tyler Furniture, Woodlands Way, Hastings	RR/2015/2264/P	Resolution subject to S106	40	40
BRO2 ¹²	Land south of the Rainbow Trout Pub, Broad Oak	RR/2018/1813/P	Resolution subject to S106	20	8
FAC1	Former Market Garden, Lower Waites Lane, Fairlight Cove	RR/2017/457/P	Resolution subject to S106	16	16
NOR2	Land south of The Paddock/Goddens Gill, Northiam	RR/2013/1490/P	Full	52	52
WES1	Land at Westfield Down, Westfield	RR/2017/1293/P	Reserved Matters	39	39
Total				375 - 394	380

- 3.15. There is a total of 248 outstanding dwellings allocated in the made Neighbourhood Plans, as at 1 April 2020.
- 3.16. The parishes of Etchingham and Hurst Green are still in preparation and have yet to reach the Regulation 14 (proposed submission) stage, while Battle and Burwash¹³ are both are preparing for the Regulation 16 (submission) stage.
- 3.17. It should be noted that the Salehurst and Robertsbridge Neighbourhood Plan (SRNP) originally allocated sites to provide between 156 and 180 dwellings. Since then however, the sites at Hodson's Mill and Grove Farm have been granted planning permission (or a resolution to grant planning permission subject to S106), reducing the figure to between 41 and 50. A mid-point of 46 dwellings has then been assumed for calculations within this report.

¹² Only part of the site allocation at The Rainbow Trout, Broad Oak has so far received planning permission for 8 dwellings.

¹³ Note that at the time of publishing this position statement, the Burwash Regulation 16 consultation has been completed.

- 3.18. Similarly, the Sedlescombe Neighbourhood Plan (SNP) has allocated sites for between 34 and 39 dwellings, therefore a mid-point of 37 dwellings has been assumed. Currently three out of the four housing allocations in Sedlescombe have outline planning applications that are under consideration.
- 3.19. The remaining part of the saved 2006 Local Plan allocation BT3: Land North of North Trade Road, Battle has been excluded from the commitments above due to concerns over its deliverability. Furthermore, it is not proposed to be re-allocated in the forthcoming Battle Neighbourhood Plan.

Large sites subject to pre-application advice

- 3.20. While not considered as commitments, and therefore they do not appear in figure 8, there are several potential housing sites which are the subject of pre-application discussions.
- 3.21. In total, there are some 300 to 400 dwellings on large sites which are the subject of pre-application discussions. It is estimated that approximately 80 of these could come forward on permissions within the next few years, with up to 30 dwellings being built within five years. These dwellings will not be included within the five-year supply however, as there is not enough evidence for them to be considered robust at this time.
- 3.22. Clearly 30 dwellings over five years would equate to only a minor amount of additional supply but if this figure were to become larger in later years, then it could be reasonable to develop enough evidence for them to be considered robust and be brought into the five-year supply.
- 3.23. It should be noted that because these are large sites only, they are not currently accounted for by the small site windfall allowance, so there would be no 'double-counting'.

4. Housing land supply

4.1. Paragraph 73 of the NPPF states that:

“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.”

4.2. This is what’s known as the five-year housing land supply position and there are several steps involved in calculating it. These are:

- Determining the annualised housing figure
- Defining the buffer
- Identifying the supply of deliverable sites
- Calculating the five-year housing land supply position

Determining the annualised housing figure

4.3. The first step in the process is to determine the number of dwellings that should be delivered over the next five years.

4.4. In previous Housing Land Supply position statements, this was calculated using the Core Strategy target of 5,700 net additional dwellings to be provided within the District, between 2011 and 2028.

4.5. However, the Core Strategy was adopted 29 September 2014 and is therefore more than five years old, as at 1 April 2020. This means that currently, the standard method for assessing Local Housing Need¹⁴ (LHN) identifies a minimum annual housing need figure for the District. It does not produce a housing requirement figure as this will be established by the plan-making process and independently tested through Examination. However, this standard method calculation is the starting point for the plan-making process.

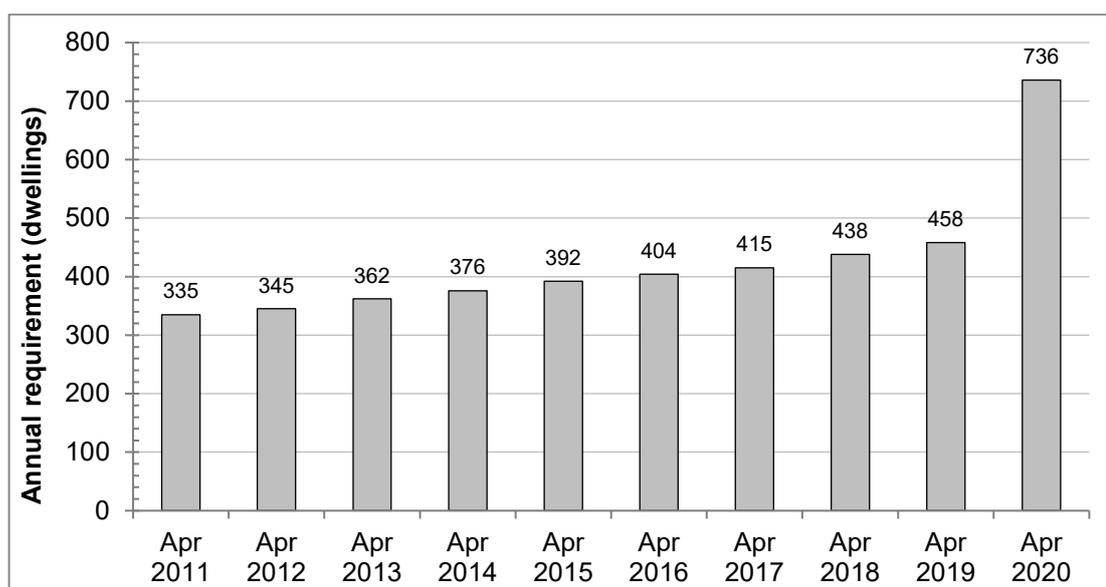
4.6. The PPG states that:

“The standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply.”

¹⁴ <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

- 4.7. A key component of the LHN calculation is the Government’s official household projections that are published for all local authorities every two years by the Office for National Statistics (ONS).
- 4.8. The 2014-based household projections in England, 2014 to 2039¹⁵ were released in July 2016. It should be noted, however, that in September 2018, 2016-based household projections were published and more recently in June 2020, 2018-based projections were published.
- 4.9. In October 2018, the Government commenced a ‘Technical consultation on updates to national planning policy and guidance’¹⁶ which included a ‘short term’ proposal which specified that the 2014-based household projections should provide the demographic baseline for the assessment of local housing need. In February 2019 the Government confirmed¹⁷ that the 2014-based household projections should be used.
- 4.10. Therefore, using the 2014-based projections, the LHN figure for Rother, as at 1 April 2020, is 736 dwellings per annum. See Appendix 7 for the calculation.
- 4.11. As shown in Figure 13, an annualised housing figure of 736 dwellings per annum is a significant increase over the requirement for previous years.

Figure 13: Annualised housing figure (dwellings)



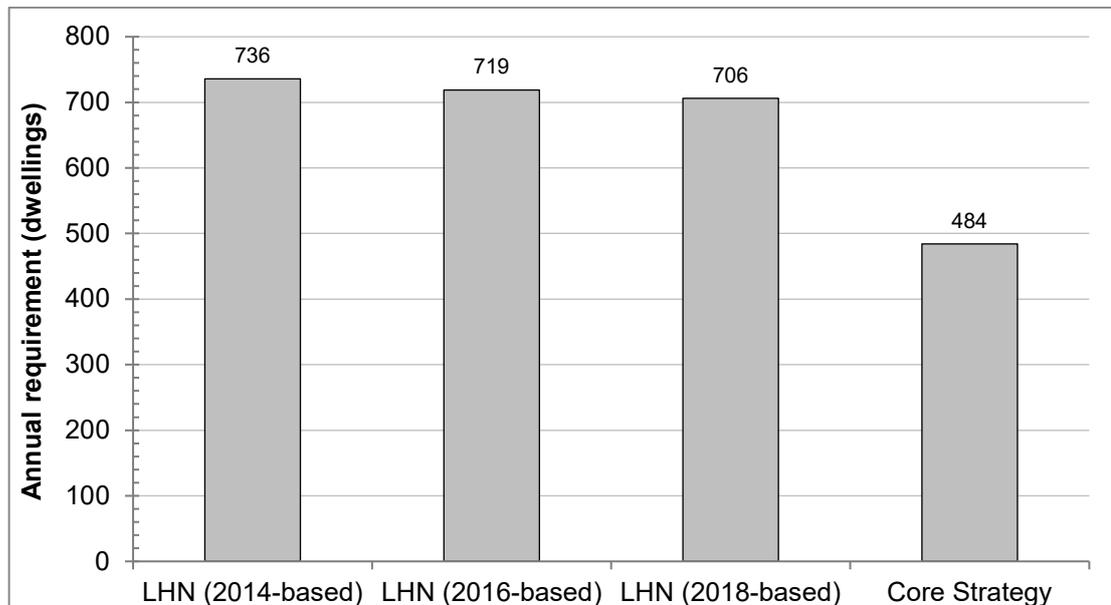
¹⁵ <https://www.gov.uk/government/statistics/2014-based-household-projections-in-england-2014-to-2039>

¹⁶ <https://www.gov.uk/government/consultations/changes-to-planning-policy-and-guidance-including-the-standard-method-for-assessing-local-housing-need>

¹⁷ See paragraph 005 of Planning Practice Guidance on ‘Housing and economic needs assessment’ <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

4.12. It is interesting to note however, that both the 2016-based and 2018-based projections produce slightly lower LHN figures than the 2014-based projections for 1 April 2020, with the now more than 5 years old Core Strategy requirement (Liverpool Method) producing a significantly lower figure.

Figure 14: Comparison of annualised housing figures using the Core Strategy and Local Housing Need (2014, 2016 and 2018-based household projections)



Defining the buffer

4.13. Paragraph 73 of the NPPF also states that:

“The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

- a) 5% to ensure choice and competition in the market for land; or*
- b) 10% where the local planning authority wishes to demonstrate a five-year supply of deliverable sites through an annual position statement or recently adopted plan¹⁸, to account for any fluctuations in the market during that year; or*
- c) 20% where there has been significant under-delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.”*

¹⁸ A plan adopted between 1 May and 31 October will be considered ‘recently adopted’ until 31 October of the following year; and a plan adopted between 1 November and 30 April will be considered recently adopted until 31 October in the same year.

- 4.14. From November 2018, '*significant under-delivery*' is defined as where the Housing Delivery Test indicates that delivery was below 85% of the dwellings required.
- 4.15. The Housing Delivery Test (HDT) is an annual measurement of housing delivery in the area of relevant plan-making authorities, brought in by the Ministry of Housing, Communities & Local Government (MHCLG). It is a percentage measurement of the number of net homes delivered against the number of homes required, as set out in the relevant strategic policies for the area, over a rolling three-year period.
- 4.16. The planning policy consequences of not meeting the HDT are set out in footnote 7 and paragraphs 73 and 75 of the NPPF.
- a) Where the HDT indicates that delivery has fallen below 95% of the local planning authority's housing requirement over the previous three years, the authority should prepare an action plan in line with national planning guidance, to assess the causes of under-delivery and identify actions to increase delivery in future years.
 - b) Where the HDT indicates that delivery has fallen below 85%, this will amount to '*significant under-delivery of housing*' and the five-year supply of specific deliverable sites should, in addition, include a buffer of 20% to improve the prospect of achieving the planned supply.
 - c) Where the HDT indicates that delivery has fallen below 25%¹⁹, the presumption in favour of sustainable development will apply, as per paragraph 11 of the NPPF.
- 4.17. The 2019 HDT results²⁰ were published on 13 February 2020. This shows that the 2019 measurement for Rother was 70%, which is below the 85% threshold, and therefore a 20% buffer should be applied to the five-year housing land supply calculations.
- 4.18. The requirement to include a 20% buffer in the housing land supply calculations compounds the existing problem, making it increasingly more difficult for the Council to achieve a positive housing land supply position.

¹⁹ This figure of 25% is a transitional arrangement only and will increase to 45% in November 2019 and 75% in November 2020.

²⁰ <https://www.gov.uk/government/publications/housing-delivery-test-2018-measurement>

- 4.19. Additionally, as the measurement is below 95%, the Council is required to produce an updated Housing Delivery Test Action Plan which will be published on the Monitoring page²¹ of the Council’s website.

Identifying the supply of deliverable housing sites

- 4.20. The NPPF defines ‘deliverable’ housing sites as follows:

“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
- b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”*

- 4.21. Not all housing commitments identified in Section 3 can be regarded as available now and with a realistic prospect of completion in the next five years. This may particularly apply to allocations which still need to obtain planning permissions and, in some cases, be secured by developers.

- 4.22. The timing of house building for large site permissions and allocations has been assessed, based on information received directly from developers, agents and landowners. Where developer feedback is not available this information is taken from Development Management officers. Statements of Common Ground have also informed the build-out rate of some strategic sites. See Appendices 1 to 4 for the phasing of large site permissions and allocations.

- 4.23. The phasing of small site permissions has not been assessed individually and has instead been distributed evenly over the five-year period 1 April 2020 to 31 March 2025.

²¹ <https://www.rother.gov.uk/planning-and-building-control/planning-policy/monitoring/>

4.24. Figure 15 identifies the supply of deliverable housing as at 1 April 2020.

Figure 15: Supply of deliverable housing sites

Source of supply	No. of dwellings
Large site permissions ²² (inc. S106)	1,976
Small site permissions	272
DaSA Local Plan allocations	230
Neighbourhood Plan allocations	57
Total	2,535

4.25. Large site permissions make up most of the deliverable housing sites, accounting for 1,976 (some 78%) of the total. Furthermore, approximately a third (27%) of those large site permissions identified as being deliverable are on the Worsham Farm site in North East Bexhill.

4.26. It is interesting to note that approximately 77% of all large site permissions have been identified as being deliverable.

4.27. Small site permissions total 272, as at 1 April 2020. It is noted that when distributed evenly over the five years, the resultant 54 dwellings per year is slightly lower than the average number of small site completions per year since 2011 (57 dwellings), as shown in Figure 3.

4.28. Several DaSA Local Plan and Neighbourhood Plan allocations have also been assessed as being capable of delivering housing within the next five years, contributing a further 230 dwellings and 57 dwellings, respectively.

Calculating the five-year housing land supply position

4.29. The supply of sites identified as being deliverable in Figure 14 is compared to the annualised housing figure identified at paragraph 4.10 to produce the five-year housing land supply figure, as shown in Figure 16.

²² Including allocated sites that have been granted planning permission or that have delegated approval subject to completion of a Section 106 agreement.

Figure 16: Calculation of the five-year housing land supply position

Calculation of the five-year housing land supply position			
A	Annual Local Housing Need	Para 4.10	736
B	Five-year housing land supply requirement	A x 5	3,680
C	Five-year housing land supply requirement plus 20% buffer	B x 1.2	4,416
D	Supply of deliverable housing sites	Figure 14	2,535
E	% supply	D / C	57.4%
F	Years' supply	E x 5	2.87

4.30. There are 2,535 dwellings on identified sites that are considered available, suitable and achievable now, which is some 1,881 dwellings (43%) less than the 4,416 dwellings required to be deliverable within the next five years, including a 20% buffer. This equates to some 2.87 years' worth of housing land supply. This is a notable decrease from the 3.73 years' worth of supply at April 2019, this impact is primarily down to the requirement to use the standard method figure rather than the adopted Core Strategy target (accounting for any undersupply).

4.31. It is concluded that there is currently an insufficient supply of deliverable housing sites to meet the five-year housing land supply requirement in accordance with paragraph 73, or a three-year housing land supply in accordance with paragraph 14c of the NPPF.

Calculation of housing supply using the Core Strategy requirement

4.32. It is also worth considering what the Council's housing land supply position would be, if the annualised housing figure was still determined by the Core Strategy. This will provide some clearer context on the Council's April 2020 housing land supply position in comparison to April 2019.

4.33. Figure 17 below substitutes the Annual Local Housing Need figure for the Core Strategy annual requirement identified in Figure 14.

Figure 17: Calculation of housing supply using the Core Strategy (CS) requirement

Calculation of the housing land supply position using the Core Strategy requirement			
A	Annual Core Strategy requirement	Para 4.8	484
B	Five-year housing supply requirement (CS)	A x 5	2,420
C	Five-year housing supply requirement (CS) plus 20% buffer	B x 1.2	2,904
D	Supply of deliverable housing sites (CS)	Figure 14	2,535
E	% supply (CS)	D / C	87.3%
F	Years' supply (CS)	E x 5	4.36

4.34. Figure 17 shows that, if the housing requirement was still determined by the Core Strategy, the Council's housing land supply position has improved by approximately 0.63 years since April 2019. Clearly the Council's housing land supply position would be significantly better off without the introduction of the standard method for calculating local housing need and, furthermore, would still be able to demonstrate a three-year housing land supply position.

Implications of the lack of a five-year supply

4.35. The Council considered the implications of a lack of a five-year supply at the meeting of its Cabinet on 6 June 2016²³. The Report indicated that the absence of a five-year supply of deliverable housing sites means that the development boundaries in the 2006 Local Plan and related restrictions on development in the countryside must be acknowledged as being 'out-of-date' (under paragraph 11 of the NPPF).

4.36. The general presumption in favour of sustainable development becomes a critical reference point when determining planning applications. It means that significant weight should generally be given to the benefits that additional housing supply would bring, although this will depend to some extent on local circumstances, including the impact on the High Weald AONB, where relevant.

4.37. Therefore, the Council resolved that, pending the adoption of the DaSA Local Plan and outstanding Neighbourhood Plans, sites that accord with the Core Strategy's overall development strategy and are suitable, deliverable and otherwise contribute to sustainable development, including circumstances where they are not within a development boundary, be considered favourably.

4.38. The issues surrounding a lack of five-year housing land supply were considered by the Overview and Scrutiny Committee²⁴ (OSC) and on 30 July 2018 the Council endorsed the following recommendations of the Committee to ensure a sufficient and continuous supply of housing land:

- a) Giving priority to completing the DaSA Local Plan and the production of Neighbourhood Plans.
- b) An early review of the Local Plan (Core Strategy) is prioritised.

²³ <http://www.rother.gov.uk/article/12003/Monday-6-June-2016>

²⁴ <http://www.rother.gov.uk/article/13225/Monday-30-July-2018>

- c) Consideration is given to allowing exception site planning policy to allow for an element of market housing to cross subsidise where viability is an issue.
- 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.
- g) Promoting higher water efficiency standards through the Local Plan as well as exploring the opportunity of introducing ‘recycled water’ within planning applications.
- h) Introduce and deliver a Landowners Forum, to take place once every two years.
- i) Prepare a housing delivery “Action Plan” in response to the new Housing Delivery Test.

4.39. The Council will seek to implement these recommendations in a timely fashion and, given the need to increase housing delivery, progressing the Local Plan Review will be prioritised with a focus on producing an updated Housing and Economic Land Availability Assessment (HELAA), including a call for sites.

4.40. To that end, the DaSA Local Plan has now been adopted (in December 2019) and work is underway in preparation of the new Local Plan.

Implications of the lack of a three-year supply

4.41. Paragraph 14 of the NPPF states that:

“In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided all of the following apply:

a) the neighbourhood plan became part of the development plan two years or less before the date on which the decision is made;

b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement;

c) the local planning authority has at least a three-year supply of deliverable housing sites (against its five-year housing supply requirement, including the appropriate buffer as set out in paragraph 73); and

d) the local planning authority’s housing delivery was at least 45% of that required over the previous three years.”

4.42. As the Council can no longer demonstrate a three-year supply of deliverable housing, the general presumption in favour of sustainable development will now be a critical reference point when determining planning applications involving the provision of housing in Neighbourhood Areas that have a ‘made’ Neighbourhood Plan.

4.43. Essentially, as the presumption in favour of sustainable development now applies to these ‘made’ Neighbourhood Plan areas, development is no longer constrained by policies in the adopted Neighbourhood Plans.

5. Housing trajectory

Supply of developable housing sites

- 5.1. Paragraph 67 b) of the NPPF states that, in addition to the supply of specific, deliverable sites identified for years one to five, a supply of specific, developable sites or broad locations for growth, for years 6 - 10 and, where possible, for years 11 - 15 of the plan should also be identified.
- 5.2. To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and are viable for development at the point envisaged.
- 5.3. Figure 18 identifies the supply of developable housing for years 6 - 10, as at 1 April 2020.

Figure 18: Supply of developable housing sites

Source of supply	No. of dwellings
Large site permissions	575
DaSA Local Plan allocations	969
Neighbourhood Plan allocations	191
Small site windfall allowance	135
Remaining exception site allowance	45
Total	2,005

- 5.4. There are an additional 575 dwellings on large sites that are identified as being developable, mostly on the site at Worsham Farm in North East Bexhill.
- 5.5. The DaSA allocations which have not yet been granted planning permission total 969 and the Neighbourhood Plan allocations are expected to provide a further 191 dwellings.
- 5.6. The phasing of development for these additional dwellings draws on information obtained to assess the supply of deliverable sites, as discussed in paragraph 4.22.

- 5.7. A small site windfall allowance of 135 dwellings has been also been included. This has been calculated by applying 45 dwellings per year, over the period from 1 April 2025 to 31 March 2030, in accordance with paragraph 7.56 on page 39 of the Core Strategy. This is considered to still be appropriate, as the number of small site completions has averaged 57 per annum since 2011, as shown in Figure 3.
- 5.8. It should be noted that work is currently underway on producing an updated windfall methodology background paper in support of the new Local Plan, which will reassess the likely contribution from windfall sites in the future, as well as the period over which any allowance should be applied.
- 5.9. Lastly, the remaining exception site allowance of 45 dwellings has been included in accordance with paragraph 7.56 on page 39 of the Core Strategy.

Housing trajectory

- 5.10. Appendices 5 and 6 show the anticipated trajectory of annual housing completions within the district.
- 5.11. It should be noted that the figures used to produce the trajectory are based on several assumptions:
- a) The large site permissions are all built-out in accordance with information received from developers.
 - b) The DaSA allocations and Neighbourhood Plan allocations that have not yet received planning permission, all come forward and are built-out for at least the number of dwellings that have been allocated, within the Core Strategy plan period.
 - c) No allowances have been made for large site windfalls.

6. Appendices

Appendix 1: Large site permissions

Large sites with permission					Expected phasing of completions									Planning Notes				
Area	Ref	Site	Settlement	Units Left	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	Total	Available	Suitable	Achievable	Commenced	Notes
Bexhill	RR/2015/3125/P	Barnhorn Green	Bexhill	184	64	60	60						184	Yes	Yes	Yes	Yes	Outline application (RR/2012/1978/P) for 275 units approved 26/11/14. Reserved Matters application (RR/2015/3125/P) approved 12/12/16. Further full application (RR/2015/3115/P) for 67 additional units approved
	RR/2015/1760/P	Worsham Farm	Bexhill	1,050	30	90	120	130	165	175	170	170	1,050	Yes	Yes	Yes	Yes	Outline application (RR/2015/1760/P) for 1,050 units (30% AH) approved 29/03/16. Reserved Matters application (RR/2016/3245/P) for Phase 1 approved 21/11/17. RDLP 2006 allocation BX2.
	RR/2016/2430/P	45-47 Barnhorn Rd	Bexhill	8								8	8	Yes	Yes	Yes	No	Full application (RR/2016/2430/P) for 10 units (8 net) approved 20/09/17.
	RR/2017/2122/P	58-60 Devonshire Rd	Bexhill	6	6								6	Yes	Yes	Yes	Yes	Full application (RR/2017/2122/P) for 6 units approved 27/11/17.
	RR/2017/2441/P	Preston Hall Farm	Bexhill	138	94	44							138	Yes	Yes	Yes	Yes	Full application (RR/2017/2441/P) for 139 units (138 net, 30% AH) approved 02/08/18. Part of RDLP 2006 allocation BX3.
	RR/2018/273/P	St Andrew's Church	Bexhill	11		11							11	Yes	Yes	Yes	Yes	Full application (RR/2018/273/P) for 11 units approved 20/04/18.
	RR/2018/2876/P	40-42 Cooden Sea Road	Bexhill	6					6				6	Yes	Yes	Yes	No	Full application (RR/2018/2876/P) for 7 units (6 net) approved 21/01/19.
	RR/2016/3206/P	Ashridge Court	Bexhill	31		15	16						31	Yes	Yes	Yes	No	Outline application (RR/2016/3206/P) for 31 units approved 23/11/2018 by appeal (ref: 2563). Reserved Matters application currently in preparation.
	RR/2018/2453/P	Terminus Road	Bexhill	10					10				10	Yes	Yes	Yes	No	Outline application (RR/2018/2453/P) for 10 units approved 20/12/2018.
	RR/2018/3127/P	Clavering Walk	Bexhill	85		35	50						85	Yes	Yes	Yes	No	Outline application (RR/2018/3127/P) for up to 85 units allowed at appeal 13/02/20.
Battle	RR/2017/1136/P	Lillybank Farm	Battle	50				25	25				50	Yes	Yes	Yes	No	Outline application (RR/2016/725/P) for 50 units (17 units, 35% affordable) approved 09/05/17. Reserved Matters application (RR/2017/1136/P) approved 29/09/17.
	RR/2018/2985/P	Tollgates	Battle	63	32	31							63	Yes	Yes	Yes	Yes	Outline application (RR/2017/1259/P) for 63 units (35% affordable) approved 01/11/17. Reserved Matters (RR/2018/2985/P) approved 04/03/19.
	RR/2017/2390/P	North Trade Road (South)	Battle	25				13	12				25	Yes	Yes	Yes	No	Outline application (RR/2017/2390/P) for 25 units (35% AH) approved 07/03/19. Pre-app for Reserved Matters underway.
Rye	RR/2017/909/P	Skinnners of Rye	Rye	6					6				6	Yes	Yes	Yes	No	Full application (RR/2017/909/P) for 6 units approved 20/11/17.
	RR/2017/2217/P	Tower Street	Rye	6				6					6	Yes	Yes	Yes	No	Full application (RR/2017/2217/P) for 6 units approved 15/08/19.
	RR/2018/1828/P	48 Ferry Road	Rye	7					7				7	Yes	Yes	Yes	No	Full application (RR/2018/1828/P) for 7 units approved 14/03/19.
Rural Villages	RR/2017/1293/P	Westfield Down	Westfield	39				20	19				39	Yes	Yes	Yes	No	Outline application (RR/2009/322/P) for 39 units approved 20/06/14. Reserved Matters (RR/2017/1293/P) approved 23/10/18. Several conditions remain to be discharged. RDLP 2006 allocation VL11.
	RR/2013/1490/P	Goddens Gill	Northiam	52							35	17	52	Yes	Yes	Yes	Yes	Full application (RR/2013/1490/P) for 58 units approved 19/12/14. Scheme commenced however doubts about viability remain. Expected units reduced to 52 which is regarded as more achievable. RDLP 2006 allocation VL6.
	RR/2018/1605/P	Culverwells	Robertsbridge	17			17						17	Yes	Yes	Yes	No	Outline application (RR/2013/2380/P) for 17 units approved 29/06/15. Reserved Matters (RR/2018/1605/P) approved 23/11/18. RDLP 2006 allocation VL8.
	RR/2018/2209/P	Banky Field	Ticehurst	40				20	20				40	Yes	Yes	Yes	Yes	Outline application (RR/2014/1652/P) for 40 units approved 12/10/15. Reserved Matters (RR/2018/2209/P) approved 18/03/19.
	RR/2015/2953/P	Hillbury Field	Ticehurst	30		15	15						30	Yes	Yes	Yes	No	Outline application (RR/2015/2953/P) for 30 units approved 13/01/17. Reserved Matters application (RR/2019/2818/P) currently under consideration.
	RR/2015/2965/PN3	Ruskin House	Bodiam	11	11								11	Yes	Yes	Yes	Yes	Prior approval not required, decided 18/01/16. This scheme, for the conversion of a B1 office building to 11 units, is a 'permitted development' scheme. Offices remain occupied.
	RR/2016/1837/P	Street Farm	Sedlescombe	16				8	8				16	Yes	Yes	Yes	No	Full application (RR/2016/1837/P) for 16 units approved 17/05/2017. RDLP 2006 allocation VL1.
	RR/2018/1580/P	Skinnners Lane	Catsfield	9	9								9	Yes	Yes	Yes	Yes	Full application (RR/2018/1580/P) for 9 units approved 17/09/18.
	RR/2017/582/P	Strand Meadow	Burwash	30				15	15				30	Yes	Yes	Yes	No	Outline application (RR/2017/582/P) for 30 units (40% AH) approved 07/03/18.
	RR/2017/1629/P	Grove Farm	Robertsbridge	30				15	15				30	Yes	Yes	Yes	No	Outline application (RR/2017/1629/P) for 24 units approved 11/02/19. Further full application (RR/2017/1642/P) for 6 units approved 05/02/19. RDLP 2006 allocation VL7.
RR/2017/2308/P	Darvel Down	Netherfield	25		12	13						25	Yes	Yes	Yes	No	Outline application (RR/2017/2308/P) for 25 units (40% AH) approved 22/10/18. Reserved Matters (RR/2019/921/P) approved 30/10/19.	
Hastings Fringes	RR/2018/2040/P	Bachelors Bump	Hastings	10				10					10	Yes	Yes	Yes	No	Full application (RR/2018/2040/P) for 10 dwellings approved 14/10/19.
Total				1,995	246	313	291	262	308	175	205	195	1,995					

Appendix 2: Large sites delegated to approve subject to S106

Large sites delegated to approve subject to S106					Expected phasing of completions									Planning Notes				
Area	Ref	Site	Settlement	Units	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	Total	Available	Suitable	Achievable	Commenced	Notes
Bexhill	RR/2017/2452/P	Moleynes Mead	Bexhill	24		6	18						24	Yes	Yes	Yes	No	Outline application (RR/2017/2452/P) for 24 units (30% AH) delegated to approve 19/04/18, subject to S106 agreement. DaSA allocation BEX7.
	RR/2019/430/P	High School and Drill Halls	Bexhill	52				36	16				52	Yes	Yes	Yes	No	Outline application (RR/2019/430/P) for up to 52 units delegated to approve 17/12/19, subject to S106 agreement. DaSA allocation BEX8.
Battle	RR/2018/2666/P	North Trade Road (North)	Battle	20				10	10				20	Yes	Yes	Yes	No	Outline application (RR/2018/2666/P) for 20 units approved 28/10/19.
	RR/2019/604/P	Blackfriars	Battle	220		80	70	70					220	Yes	Yes	Yes	No	Outline application (RR/2019/604/P) for 220 units delegated to approve 14/10/19, subject to S106 agreement. RDLP 2006 site allocation BT2.
Rye	RR/2017/1778/P	Thomas Peacocke	Rye	65		25	20	20					65	Yes	Yes	Yes	No	Full application (RR/2017/1778/P) for 65 dwellings delegated to approve 14/11/19, subject to S106 agreement. Rye Neighbourhood Plan allocation H8.
Rural Villages	RR/2017/457/P	Market Garden	Fairlight	16			10	6					16	Yes	Yes	Yes	No	Full application (RR/2017/457/P) for 16 units (40% AH) delegated to approve 15/03/18, subject to S106 agreement. DaSA allocation FAC1.
	RR/2017/382/P	Hodson's Mill	Robertsbridge	96			32	32	32				96	Yes	Yes	Yes	No	Full application (RR/2017/382/P) for 96 units delegated to approve 11/10/18, subject to S106 agreement.
	RR/2018/1813/P	Rainbow Trout	Broad Oak	8					8				8	Yes	Yes	Yes	No	Full application (RR/2018/1813/P) for 8 units delegated to approve 12/02/19, subject to S106 agreement. Part of DaSA site allocation BRO2.
	RR/2019/243/P	Land off Main Road	Icklesham	15		15							15	Yes	Yes	Yes	No	Full application (RRR/2019/243/P) for 15 units delegated to approve 04/06/19, subject to S106 agreement.
Hastings Fringes	RR/2015/2264/P	Michael Tyler Factory	Hastings	40			20	20					40	Yes	Yes	Yes	No	Outline application (RR/2015/2264/P) for 40 units delegated to approve 30/05/19, subject to S106 agreement. DaSA site allocation HAS2.
Total				556	0	126	170	194	66	0	0	0	556					

Appendix 3: DaSA allocations

DaSA Allocations					Expected phasing of completions									Planning Notes			
Area	Settlement	Site	Policy	Units (mid)	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	Total	Available	Suitable	Achievable	Notes
Bexhill	Bexhill	North Bexhill	BEX3a	250					60	70	70	50	250	Yes	Yes	Yes	Site proposed to be allocated in the Development and Site Allocations Local Plan for 250 dwellings.
	Bexhill	North Bexhill	BEX3b	130					40	50	40		130	Yes	Yes	Yes	Site proposed to be allocated in the Development and Site Allocations Local Plan for 130 dwellings.
	Bexhill	North Bexhill	BEX3c	150					50	50	50		150	Yes	Yes	Yes	Site proposed to be allocated in the Development and Site Allocations Local Plan for 150dwellings.
	Bexhill	Gullivers Bowls Club	BEX5	39							20	19	39	Yes	Yes	Yes	Site proposed to be allocated in the Development and Site Allocations Local Plan for 39 dwellings.
	Bexhill	Cemetery Lodge	BEX6	30				10	20				30	Yes	Yes	Yes	Site proposed to be allocated in the Development and Site Allocations Local Plan for 30 dwellings.
	Bexhill	Spindlewood Drive	BEX9	160						50	50	60	160	Yes	Yes	Yes	Site proposed to be allocated in the Development and Site Allocations Local Plan for 160 dwellings. Outline application RR/2017/1705/P for up to 160 dwellings currently under consideration.
	Bexhill	Northeye	BEX10	140						40	50	50	140	Yes	Yes	Yes	Site proposed to be allocated in the Development and Site Allocations Local Plan for 140 dwellings.
Rural Villages	Beckley Four Oaks	Hobbs Lane	BEC1	14						7	7		14	Yes	Yes	Yes	Site proposed to be allocated in the Development and Site Allocations Local Plan for 14 dwellings. Outline application RR/2019/865/P for 4 dwellings currently under consideration on part of the site.
	Beckley Four Oaks	Buddens Green	BEC2	6						6			6	Yes	Yes	Yes	Site proposed to be allocated in the Development and Site Allocations Local Plan for 6 dwellings.
	Broad Oak	Land west of A28	BRO1	40							20	20	40	Yes	Yes	Yes	Site proposed to be allocated in the Development and Site Allocations Local Plan for 40 dwellings.
	Broad Oak	Rainbow Trout	BRO2	12							6	6	12	Yes	Yes	Yes	Site proposed to be allocated in the Development and Site Allocations Local Plan for 20 dwellings. Full application (RR/2018/1813/P) for 8 units delegated to approve 12/02/19, subject to S106 agreement, on part of the site.
	Camber	Former Putting Green	CAM1	10								10	10	Yes	Yes	Yes	Site proposed to be allocated in the Development and Site Allocations Local Plan for 10 dwellings.
	Catsfield	The White Hart	CAT1	35						20	15		35	Yes	Yes	Yes	Site proposed to be allocated in the Development and Site Allocations Local Plan for 35 dwellings.
	Fairlight Cove	Wakehams Farm	FAC2	30				20	10				30	Yes	Yes	Yes	Site proposed to be allocated in the Development and Site Allocations Local Plan for 30 dwellings.
	Iden	Elmsmead	IDE1	12							9	3	12	Yes	Yes	Yes	Site proposed to be allocated in the Development and Site Allocations Local Plan for 12 dwellings.
	Northiam	Northiam CE School	NOR1	6						6			6	Yes	Yes	Yes	Site proposed to be allocated in the Development and Site Allocations Local Plan for 6 dwellings.
	Peasmarsh	Main Street	PEA1	45					20	25			45	Yes	Yes	Yes	Site proposed to be allocated in the Development and Site Allocations Local Plan for 45 dwellings.
	Rye Harbour	Stonework Cottages	RHA1	40							20	20	40	Yes	Yes	Yes	Site proposed to be allocated in the Development and Site Allocations Local Plan for 40 dwellings.
	Westfield	Moorhurst	WES2	40						20	20		40	Yes	Yes	Yes	Site proposed to be allocated in the Development and Site Allocations Local Plan for 40 dwellings.
Westfield	Goulds Drive	WES3	10						5	5		10	Yes	Yes	Yes	Site proposed to be allocated in the Development and Site Allocations Local Plan for 10 dwellings.	
Total				1,199	0	0	0	30	200	349	382	238	1,199				

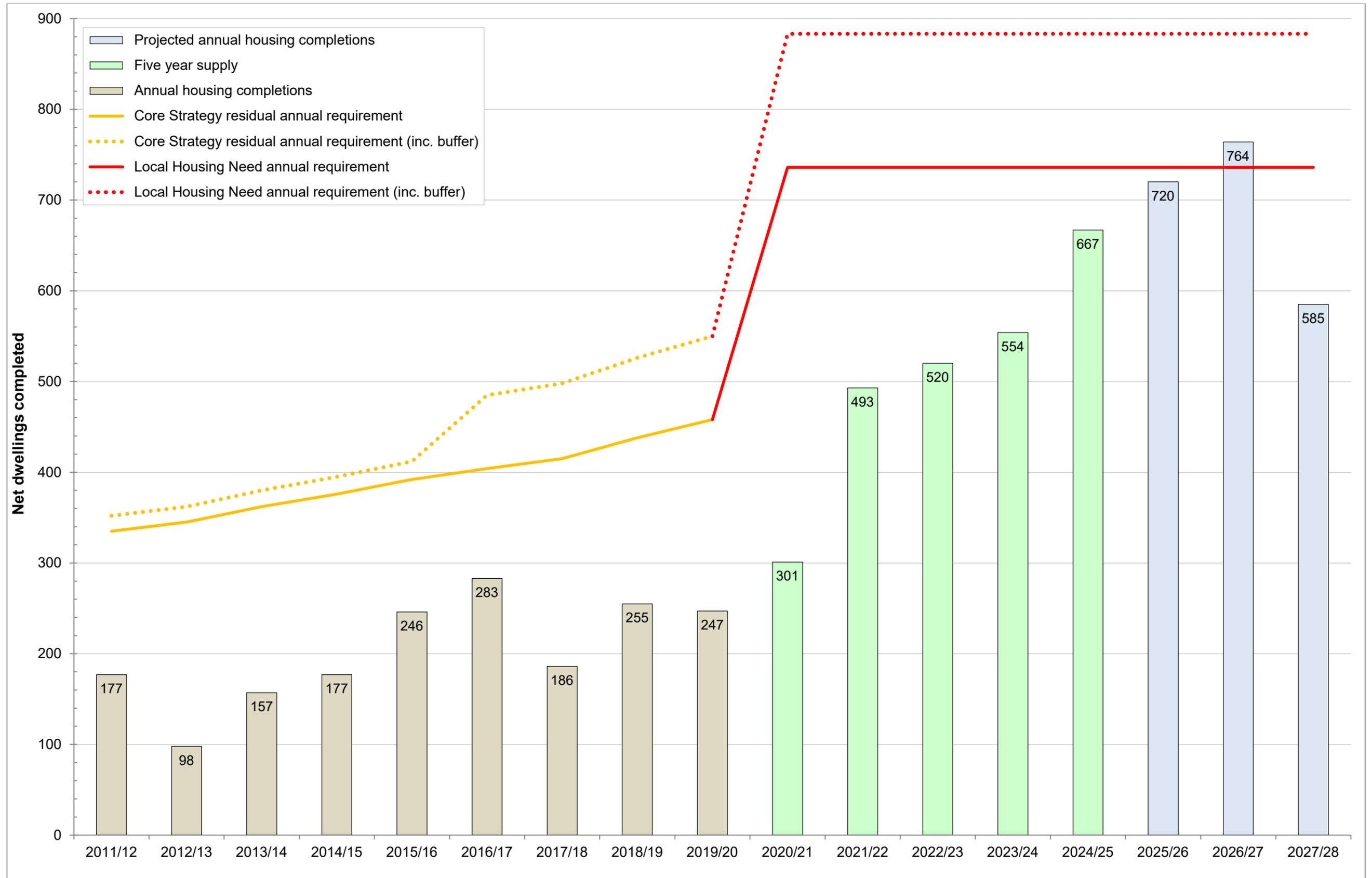
Appendix 4: Neighbourhood Plan allocations

Neighbourhood Plan Allocations					Expected phasing of completions									Planning Notes				
Area	Plan	Site	Policy	Units (mid)	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	Total	Available	Suitable	Achievable	Notes	
Rye	Rye NP	Tilling Green, Rye	H3	20							10	10	20	Yes	Yes	Yes	Site allocated in the Rye Neighbourhood Plan (made July 2019) for 20 dwellings.	
		Rock Channel, Rye	H4	30			5	6	10	9				30	Yes	Yes	Yes	Site allocated in the Rye Neighbourhood Plan (made July 2019) for 30 dwellings. Full application (RR/2019/789/P) for 11 dwellings currently under consideration on part of the site.
		Winchelsea Road East, Rye	H5	10							5		5	10	Yes	Yes	Yes	Site allocated in the Rye Neighbourhood Plan (made July 2019) for 10 dwellings.
		Winchelsea Road West, Rye	H6	20							10	10		20	Yes	Yes	Yes	Site allocated in the Rye Neighbourhood Plan (made July 2019) for 20 dwellings.
		Freda Gardham, Rye	H7	30								15	15	30	Yes	Yes	Yes	Site allocated in the Rye Neighbourhood Plan (made July 2019) for 20 dwellings.
Rural Villages	Crowhurst NP	Forewood Lane	CH1	12						6	6		12	Yes	Yes	Yes	Site allocated in the Crowhurst Neighbourhood Plan (made July 2019) for 12 dwellings.	
		Forewood Rise	CH2	12								6	6	12	Yes	Yes	Yes	Site allocated in the Crowhurst Neighbourhood Plan (made July 2019) for 12 dwellings.
		Station Car Park	CH3	6									6	6	Yes	Yes	Yes	Site allocated in the Crowhurst Neighbourhood Plan (made July 2019) for 6 dwellings.
	Salehurst & Robertsbridge NP	Heathfield Gardens	HO2	38							20	18		38	Yes	Yes	Yes	Site allocated in the Salehurst & Robertsbridge Neighbourhood Plan (made July 2018) for approx. 35 to 40 dwellings.
		Vicarage Land	HO2	8							8			8	Yes	Yes	Yes	Site allocated in the Salehurst & Robertsbridge Neighbourhood Plan (made July 2018) for approx. 6 to 10 dwellings.
	Sedlescombe NP	Sunningdale	SNP 2	8				8						8	Yes	Yes	Yes	Site allocated in the Sedlescombe Neighbourhood Plan (made April 2018) for approx. 6 to 9 dwellings. Outline application (RR/2019/2485/P) for 8 dwellings currently under consideration.
		Village Hall, North of	SNP 4	11							11			11	Yes	Yes	Yes	Site allocated in the Sedlescombe Neighbourhood Plan (made April 2018) for approx. 10 to 12 dwellings.
		Gate Cottage	SNP 7	8						8				8	Yes	Yes	Yes	Site allocated in the Sedlescombe Neighbourhood Plan (made April 2018) for approx. 8 dwellings. Outline application (RR/2019/1332/P) for 8 dwellings currently under consideration.
		Church Hill Farm	SNP 8	10						10				10	Yes	Yes	Yes	Site allocated in the Sedlescombe Neighbourhood Plan (made April 2018) for approx. 10 dwellings. Outline application (RR/2018/3064/P) for 10 dwellings currently under consideration.
	Ticehurst NP	Wardsdown House	H2(3)	9							9			9	Yes	Yes	Yes	Site allocated in the Ticehurst Neighbourhood Plan (made July 2019) for 9 dwellings.
		Orchard Farm	H2(1)	6							6			6	Yes	Yes	Yes	Site allocated in the Ticehurst Neighbourhood Plan (made July 2019) for 6 dwellings.
		Singehurst	H2(2)	10						10				10	Yes	Yes	Yes	Site allocated in the Ticehurst Neighbourhood Plan (made July 2019) for 10 dwellings. Full application (RR/2020/585/P) for 10 dwellings currently under consideration.
	Total				248	0	0	5	14	38	84	65	42	248				

Appendix 5: Housing trajectory table

Area	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	Total
Bexhill	35	29	76	82	96	131	84	174	145	216	283	287	198	389	450	465	372	3,512
Battle	-1	7	3	5	7	4	5	4	5	39	118	77	125	54	8	8	7	475
Rye	74	14	11	26	73	28	1	5	0	4	29	28	36	27	27	38	33	454
Rural Villages	69	47	67	64	62	96	70	63	80	42	63	108	165	196	235	253	173	1,853
Hastings Fringes	0	1	0	0	8	24	26	9	17	0	0	20	30	1	0	0	0	136
Yearly Total	177	98	157	177	246	283	186	255	247	301	493	520	554	667	720	764	585	6,430

Appendix 6: Housing trajectory graph



Appendix 7: Local Housing Need calculation

1	Setting the baseline	2020 Projection	2030 Projection	10yr Growth	Annual Growth over 10yrs
	<p>Set the baseline using national household growth projections (2014-based household projections in England, table 406 unitary authorities and districts in England) for the area of the local authority. Using these projections, calculate the projected average annual household growth over a 10-year period (this should be 10 consecutive years, with the current year being used as the starting point from which to calculate growth over that period). Note that the figures displayed are rounded and individual cells need to be viewed in order to see the full number.</p> <p>https://www.gov.uk/government/statistical-data-sets/live-tables-on-household-projections</p>	44,486	49,741	49,741 - 44,846 = 5,255	5,255 / 10 = 526
2	An adjustment to take account of affordability	Local Affordability Ratio	Adjustment Factor Calculation	Local Housing Need	
	<p>Then adjust the average annual projected household growth figure (as calculated in step 1) based on the affordability of the area.</p> <p>The most recent median workplace-based affordability ratios, published by the Office for National Statistics at a local authority level, should be used.</p> <p>No adjustment is applied where the ratio is 4 or below. For each 1% the ratio is above 4 (with a ratio of 8 representing a 100% increase), the average household growth should be increased by a quarter of a percent. To be able to apply the percentage increase adjustment to the projected growth figure we then need to add 1.</p> <p>Where an adjustment is to be made, the precise formula is as follows: Adjustment Factor = ((Local Affordability Ratio - 4) / 4) * 0.25 + 1</p> <p>https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian</p>	12.42	1.526	526 x 1.526 = 802	
3	Capping the level of any increase	Capped if Policies less than 5yr old	Capped if Policies more than 5yr old		
	<p>A cap is then applied which limits the increases an individual local authority can face. How this is calculated depends on the current status of relevant strategic policies for housing.</p> <p>Where these policies were adopted within the last 5 years (at the point of making the calculation), the local housing need figure is capped at 40% above the average annual housing requirement figure set out in the existing policies.</p> <p>This also applies where the relevant strategic policies have been reviewed by the authority within the 5-year period and found to not require updating.</p> <p>For areas covered by spatial development strategies, the relevant strategic policies are those contained within the spatial development strategy. For example, where a requirement figure for an authority in a spatial development strategy differs from that in a local plan, the figure in the spatial development strategy should be used.</p> <p>Where the relevant strategic policies for housing were adopted more than 5 years ago (at the point of making the calculation), the local housing need figure is capped at 40% above whichever is the higher of:</p> <ol style="list-style-type: none"> the projected household growth for the area over the 10-year period identified in step 1; or the average annual housing requirement figure set out in the most recently adopted strategic policies (if a figure exists). 	469	736		