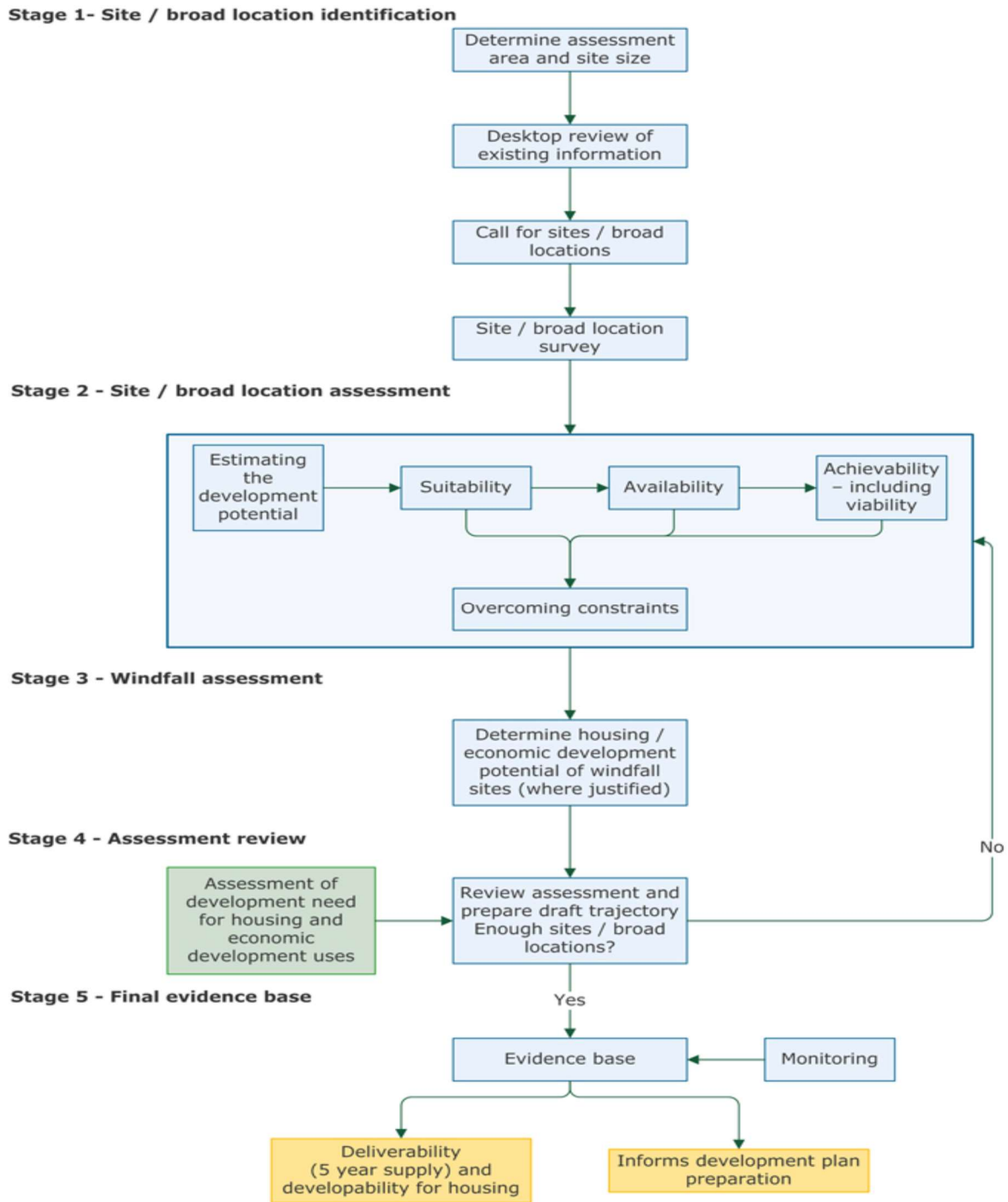


Figure 1: PPG Methodology Flowchart



Stage 1: Identification of sites and broad locations

Determining the assessment area

- 3.3 The PPG confirms that the area selected for the assessment should be the plan-making area. This can be the local planning authority area, two or more local authority areas, areas covered by a spatial development strategy, or areas covered by the Local Enterprise Partnership. In this case, the plan making area is the district of Rother and this will be the area which the HELAA will cover.

Who should Rother District Council work with?

- 3.4 As advised at paragraph 007 of the PPG, the assessment will be undertaken and regularly reviewed. Rother shares its housing market area and functional economic market area with Hastings Borough Council (HBC) and as such and in line with the guidance, is working with them in line with the duty to cooperate.
- 3.5 It is also important to involve landowners and promoters; local property agents; developers; local communities; Local Enterprise Partnerships; businesses and their local representative organisations; parish and town councils and neighbourhood forums preparing neighbourhood plans. These groups will be given the opportunity to submit details of any potential sites for housing and economic land that they wish to be considered.

Size of sites and broad locations to be assessed

- 3.6 Paragraph 009 of the PPG states that plan-makers will need to assess a range of different site sizes from small scale sites to opportunities for large scale developments such as village and town extensions and new settlements where appropriate. In terms of housing, sites capable of delivering five or more dwellings is suggested and for economic development sites measuring 0.25 hectares (or 500 square metres of floor space) and above, although it does say that plan-makers may wish to consider alternative site size thresholds. The Framework expects a minimum proportion of the sites identified as suitable for housing to be no larger than one hectare, unless there are strong reasons why this cannot be achieved.
- 3.7 For resource efficiency purposes, the identification of sites in Rother will be limited to those capable of accommodating five dwellings or more for residential proposals or 0.25 hectares or more (or 500 square metres or more of floor space) for economic proposals. These thresholds are slightly lower than Rother's current monitoring process and Annual Monitoring Report which sub-divides 'small' and 'large' sites at a six dwellings threshold.
- 3.8 In addition, small scale development boundary amendments will also be considered. These must adjoin existing development boundaries and will take into consideration sites that are below the five dwellings threshold.

How sites and broad locations will be identified

- 3.9 In line with paragraph 010 of the PPG, when carrying out the desktop review, a proactive approach will be taken to identify as wide a range of sites and broad locations for development as possible (including those existing sites that could be improved, intensified or changed). Identified sites, which have particular constraints, will be included in the assessment for the sake of comprehensiveness but the constraints will be set out clearly, including where they severely restrict development. The assessment will identify sites and their constraints, rather than simply rule out sites outright which are known to have constraints.
- 3.10 In Rother, the High Weald Area of Outstanding Natural Beauty (AONB) has over 82% coverage, whilst large parts of the remainder of the district are subject to other constraints such as international habitat designations and flood risk. The AONB is recognised through national policy as a protected area, where application of policies in the Framework provide a strong reason for restricting the overall scale, type or distribution of development in the plan area, and will be appropriately considered by the relevant evidence based studies used to inform the Local Plan. Nevertheless, housing and economic requirements necessitate some development within the AONB. Development in rural areas will also be necessary and justified to meet local needs.

Types of sites and sources of data to be used

- 3.11 The PPG advises that plan-makers should consider all available types of sites and sources of data that may be relevant in the assessment process. It confirms:

It is important that plan-makers do not simply rely on sites that they have been informed about, but actively identify sites through the desktop review process that may assist in meeting the development needs of an area.

- 3.12 The table below (Figure 2) is based on a table in the PPG and highlights data sources that will be used in identifying different types of sites. In addition, the knowledge of council officers and Councillors will be used to help to identify potential sites.

Figure 2: Data sources used in identifying sites

<i>Type of site (as listed in PPG)</i>	<i>Data sources that sites will be drawn from</i>
Existing housing and economic development allocations and site development briefs not yet with planning permission.	<ul style="list-style-type: none">• Development and Site Allocations Local Plan.• 'Made' Neighbourhood Plans including those for Battle, Crowhurst, Rye, Salehurst and Robertsbridge, Sedlescombe and Ticehurst.• Planning application records.

	<ul style="list-style-type: none"> • Development Briefs including the North East Bexhill 'Masterplan' SPD and Camber Village SPD.
Planning permissions for housing and economic development that are unimplemented or under construction.	<ul style="list-style-type: none"> • Planning application records. • Development starts and completions records.
Planning applications that have been refused or withdrawn.	<ul style="list-style-type: none"> • Planning application records - review reasons for refusal/withdrawal and assess the potential for issues to be resolved. • Assess viability.
Land in the local authority's ownership.	<ul style="list-style-type: none"> • Local authority records.
Surplus and likely to become surplus public sector land.	<ul style="list-style-type: none"> • National register of public sector land. • Engagement with strategic plans of other public sector bodies such as county councils, central government, National Health Service, police, fire services, utilities services, statutory undertakers.
Sites with permission in principle and identified brownfield land.	<ul style="list-style-type: none"> • Brownfield land register.
Vacant and derelict land and buildings (including empty homes, redundant and disused agricultural buildings, potential permitted development changes, e.g. offices to residential)	<ul style="list-style-type: none"> • Local authority records. • English Housing Survey. • Commercial property databases (e.g. estate agents and property agents). • Active engagement with sector. • Brownfield land registers. • Prior Notification applications.
Additional opportunities for unestablished uses (e.g. making productive use of under-utilised facilities such as garage blocks).	<ul style="list-style-type: none"> • Ordnance Survey maps. • Aerial photography. • Planning applications. • Site surveys. • Call for sites. • Windfall sites.
Business requirements and aspirations.	<ul style="list-style-type: none"> • Enquiries received by the local planning authority. • Active engagement with the sector, including with Locate East Sussex. • Call for sites.

Sites in rural locations.	<ul style="list-style-type: none"> • Development and Site Allocations Local Plan. • ‘Made’ Neighbourhood Plans including those for Battle, Crowhurst, Rye, Salehurst and Robertsbridge, Sedlescombe and Ticehurst. • Planning applications. • Ordnance Survey maps. • Aerial photography. • Site surveys. • Call for sites. • Omission sites. • Other previously assessed sites (2013 SHLAA – not allocated or permitted).
Large scale redevelopment and redesign of existing residential or economic areas.	
Sites in adjoining villages and rural exceptions sites.	
Potential urban extensions and new free-standing settlements.	

Call for sites and broad locations

3.13 The call for sites and broad locations will be aimed at as wide an audience as is practicable, including those not usually involved in property development. The call for sites will target the following groups and people:

- Town and parish councils
- Relevant bodies undertaking neighbourhood plans.
- Landowners and promoters
- Developers
- Planning agents
- Local property agents (residential and commercial).
- Local Enterprise Partnerships.
- Businesses and relevant local interest groups.
- Local publicity.

3.14 The information that will be sought from respondents will include:

- Site location, to include a plan to identify the land;
- Suggested potential type of development;
- Details relating to the suitability, availability and achievability of sites;
- Constraints to development; and
- Any supporting evidence/studies which the landowner/land promoter/developer has undertaken to support development of the site.

3.15 Brownfield sites submitted for housing during the call for sites will also be considered for the next iteration of the Council’s Brownfield Land Register.

What will be included in the site and broad location survey?

3.16 The survey will include a comprehensive list of sites and broad locations derived from data sources (set out in Figure 2) and the call for sites.

3.17 Prior to a more detailed survey, a desktop assessment of sites and broad locations will be carried out on the following basis:

- Review sites previously considered, for example sites identified within the previous SHLAA, unimplemented planning permissions.
- Validate information gathered through the call for sites.
- Carry out planning history checks.
- Where sites have planning permission, obtain up to date information on development progress.
- Gain a more detailed understanding of deliverability, any barriers and how they could be overcome.
- Identify further sites with potential for development that were not identified through data sources or the call for sites. This may include natural extensions to sites that have been identified through the call for sites which are in separate ownership and remaining parcels of land between identified sites.

Information to be recorded during the Stage 1 site survey

3.18 During the site survey and/or desktop review the following information will be recorded:

- Site size, boundaries and location.
- Current land use and character.
- Land uses and character of the surrounding area.
- Physical constraints such as access, contamination, topography, flood risk, natural features of significance, location of infrastructure/utilities.
- Potential environmental constraints (AONB, flood risk, habitat designations etc.) See figure 3 below for detail on the Council's approach to considering constraints.
- Identify any barriers which may impact on deliverability and how they may be overcome.
- Consistency with national policies, and development plan policies where relevant.
- Proximity to services and other infrastructure, such as public transport.
- Potential for low carbon and renewable energy (either as part of a development, or a standalone scheme)
- Initial assessment of whether the site is suitable for a particular type of use or as part of a mixed-use development.
- Gain a better understanding of what type (use) and scale of development may be appropriate by looking at neighbouring uses and densities.

Stage 2: site/broad location assessment

3.19 If a site is identified during the Stage 1 review as being unsuitable for development with little prospect of constraints being overcome then it will not be taken forward for further assessment. This will require a judgement by the assessing officers. Reasons for the decision will be clearly set out. It should

be noted however that the exclusion of a site from the HELAA does not rule out a site from ever being developed or from being considered again in the future, should circumstances change.

- 3.20 All sites not excluded at the end of the Stage 1 process will be taken forward to Stage 2 for more detailed assessment of their suitability, availability and achievability.

Assessing the suitability of sites and broad locations

- 3.21 A site or broad location can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated (paragraph 018 of the PPG).
- 3.22 When considering constraints, the information collected as part of the initial site survey will be considered together with an assessment against local³ and national policy; the appropriateness and the likely market attractiveness of the type of development proposed; and the potential impacts including the effects on landscapes, including landscape features, nature and heritage conservation. Key stakeholders, such as the Highway Authority, National Highways, Southern Water, Environment Agency, Natural England and the High Weald AONB Unit, amongst others, will need to be consulted at this stage, where necessary and practicable, to provide their expert input.
- 3.23 Figure 3 below sets out the Council’s approach to considering common constraints when assessing a site/broad location’s suitability for development. It should be noted that this list is not exhaustive.

Figure 3: Approach to assessing constraints

Constraint	Approach to assessment
Ancient Woodland	Sites where ancient woodland would be lost or adversely impacted will be rejected in line with paragraph 180 (c) of the Framework, unless there are wholly exceptional circumstances as set out in footnote 63 of the Framework. Where there is ancient woodland on or near to the site which could be retained, which may include mitigation, sites will not be ruled out. The Standing Advice from Natural England should be utilised and Natural England should be consulted directly where necessary.

³ The PPG confirms: “When assessing sites against the adopted development plan, plan-makers will need to take account of how up to date the plan policies are and consider the relevance of identified constraints on sites / broad locations and whether such constraints may be overcome. When using the emerging plan to assess suitability, plan-makers will need to account for potential policy changes or other factors which could impact the suitability of the site / broad location.”

High Weald AONB	<p>Paragraph 177 of the Framework rules out major development within the AONB other than in exceptional circumstances. For the purpose of paragraph 177, ‘major development’ is defined as a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined. Sites will not be ruled out for constituting ‘major development’ but will need to be identified as such within the assessment.</p> <p>Guidance has been received from the High Weald AONB Unit on assessing sites in the AONB. All such sites will be considered against the five defining components of character, as set out in the High Weald AONB Management Plan:</p> <ul style="list-style-type: none"> • Geology, landform, water systems and climate • Settlement • Routeways • Woodland • Field and heath (including consideration of the effect on historic field patterns). <p>The High Weald AONB Unit will be consulted, where practicable, on sites likely to have a moderate to high impact.</p>
Landscape impact	<p>Sites outside of the AONB will need to be assessed in terms of landscape impact and how they affect the setting of any settlements they relate to as well as the character and appearance of the surrounding countryside.</p> <p>Existing Landscape Character Assessments will be considered, and the County Landscape Architect will be consulted where necessary.</p>
Topography and land conditions	<p>The topography of the site will be described, and any land stability issues identified, with the potential for impact of development in terms of earthworks flagged. Any form of potential harm to the character and appearance of an area or the extent of any necessary works which could impact on viability or limit the amount of development will be recorded.</p>
Development boundaries	<p>Development boundaries will not be applied as a constraint to site suitability as amendments can be undertaken through the Local Plan process to accommodate development needs in the future.</p>
Employment land	<p>Existing employment sites will generally be viewed as unsuitable for residential uses unless deemed surplus to requirements in any future employment land review or</p>

	comprehensive evidence is provided to demonstrate that there is no reasonable prospect of an employment use continuing.
Other uses	In accordance with paragraphs 93 (c) and 99 of the Framework, community facilities, sports grounds and buildings and recreation facilities will generally be viewed as unsuitable for residential uses the criteria set out in the Framework is met.
Flood zones and drainage	<p>In accordance with paragraphs 159-165 of the Framework, sites falling entirely within the functional floodplain (zone 3b) will be considered unsuitable. Sites in flood zone 3a will only be included where the exception test is applied and passed. Where part of the site falls within zone 3b, this part of the site will be excluded from the calculation of the developable area.</p> <p>Sites within the Fairlight and Pett Level Drainage Area and Pevensey Levels Hydrological Catchment Area, together with any that may be identified within the Strategic Flood Risk Assessment as having surface water flooding issues and those known to have drainage issues, will be flagged.</p> <p>The Environment Agency and Lead Local Flood Authority will be consulted where necessary.</p>
Heritage designations and their setting	<p>In line with Chapter 16 of the Framework, designated and non-designated heritage assets will be identified, with the potential for impact flagged. Any form of potential harm (whether substantial or less than substantial) will be recorded.</p> <p>The Council's Conservation Officer and/or Historic England will be consulted where necessary.</p>
International, national and local habitat designations	<p>In line with paragraphs 180 (b) and 181 of the framework, sites or parts of sites within national and international designations will not be considered suitable. Sites adjacent or near to will be flagged. Locally protected sites and areas of Priority Habitat will be noted and assessed in line with paragraphs 175 and 179 of the Framework. The County Ecologist will be consulted where necessary.</p> <p>Sites within SSSI Impact Risk Zones will be noted where the Risk Zone relates to a residential or commercial use.</p>
Open space	Paragraph 99 of the Framework seek to retain open space. Sites which would result in the complete loss or reduction in open space will not be considered suitable.
Access and sustainable transport	An assessment will be made of whether access is available to the site and any highway safety issues will be identified. The site's sustainability in terms of access to services by public transport, walking and cycling will be

	considered together with whether such access can be improved. The Highway Authority will be consulted where necessary.
Infrastructure and utilities	Any availability issues will be flagged.
Waste or minerals development or infrastructure	If the site is shown as being within a Minerals or Waste Consultation Area, the Minerals and Waste Planning Authority (East Sussex County Council) will be consulted where necessary.
Close to District Boundary	For sites adjoining or in close proximity to the District Boundary, the relevant adjoining Authority will be consulted where necessary.

Estimating the development potential of sites and broad locations

- 3.24 Where a site has planning permission or a relatively recent expired permission, the quantum of development that was granted will be used to guide the site capacity.
- 3.25 For sites with no planning permission, or any permission expired more than 10 years ago, consideration will be made to site circumstances, previous planning permissions and adjacent development, where relevant, when considering density. This includes looking at higher densities in more accessible locations.
- 3.26 Paragraph 124 of the Framework states that planning policies should support development that makes efficient use of land but explains that the prevailing character of areas should be maintained and the importance of securing well designed, attractive and healthy places should be taken into account. Paragraph 125 of the Framework states that where there is an existing or anticipated shortage of land for identified housing needs it is especially important for policies to avoid homes being built at low densities. In these circumstances, paragraph 125 notes that *plans should include the use of minimum density standards for city and town centres and other locations that are well served by public transport, and that the use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas...*
- 3.27 When assessing HELAA sites, the development potential of each site will be calculated by making the most effective use of land whilst also applying a density appropriate to the site context, which is of particular importance within the High Weald AONB in order to protect its landscape, character and scenic beauty. In more accessible urban areas, it may be appropriate to raise densities and use a range for the number of units.

Assessing the availability of sites and broad locations

- 3.28 Paragraph 019 of the PPG states that a site can be considered available for development, when, on the best information available (confirmed by the call for sites and information from landowners and legal searches where appropriate), there is confidence that there are no legal or ownership impediments to development. For example, land controlled by a developer or landowner who has expressed an interest to develop may be considered available.
- 3.29 The existence of planning permission can be a good indication of the availability of sites. Sites meeting the definition of deliverable⁴ should be considered available unless evidence indicates otherwise. Sites without permission can be considered available within the first five years. Consideration can also be given to the delivery record of the developers or landowners putting forward sites, and whether the planning background of a site shows a history of unimplemented permissions.
- 3.30 Figure 4 below identifies some of the potential considerations in determining whether a particular site is available.

Figure 4: Considerations of Availability

Consideration	Approach to assessment
Ransom strip, multiple ownership, access via a private road and other access issues.	Flag as potential issues to resolve, where necessary.
Interest of owner/developer	If a site has been put forward by the landowner or a developer on behalf of a landowner, this should be viewed as showing an interest to develop the land and thus available
Planning permission extant	This will generally indicate that a site is available.
Sites with existing occupiers and site is not clear for development	Evidence will need to be obtained of if and when the site is likely to become vacant.

Assessing the achievability of sites and broad locations, including whether development would be viable

- 3.31 A site is considered achievable for development where there is a reasonable prospect that it will be developed for the intended use at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period. The market, cost and delivery factors will all need to be taken into consideration and are expanded on below.

⁴ As set out in the NPPF Glossary

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

Overcoming constraints

- 3.32 Where constraints have been flagged as an issue, more detailed investigations will be carried out to establish whether mitigation could resolve any conflict with policy, or whether issues relating to ownership, for example, are likely to be resolved easily. It should be noted that some constraints, such as location within the functional floodplain or SSSI designation, will not be able to be overcome and will mean those sites will not be progressed. This will be clearly set out in the site assessment.

Stage 3: Windfall Assessment

Windfall assessment

- 3.33 A windfall allowance may be justified in the anticipated supply if there is compelling evidence as set out in paragraph 71 of the Framework. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. A separate detailed windfall methodology assessment will be carried out.

Stage 4: Assessment Review

- 3.34 Upon completion of the assessments for the site and broad locations, the development potential will be known and thus an indicative trajectory will be produced. The number of units for housing and the total site area for economic uses will be provided together with information on at which point it is likely to come forward in the future (years 1 – 5; 6 – 10; or 11 and beyond). An overall risk assessment will also be carried out as to whether sites will come forward as anticipated, which will be aligned to the Council's assessment of its 5 year housing supply and whether sites are coming forward as anticipated, together with reasons for any delays.

Plan of action in the event that there are insufficient sites and broad locations identified to meet the objectively assessed needs

- 3.35 The Government's standard method for calculating local housing need, as set out in the Framework and PPG, provides a minimum number of homes to be

planned for (“the objectively assessed need”). Local Authorities are required to use the standard method as the starting point when preparing the housing requirement in their plan, unless exceptional circumstances justify an alternative approach.

3.36 If the HELAA identifies insufficient sites to meet Rother’s objectively assessed needs, the following steps will be taken to seek additional sites and broad locations:

- The development potential for each of the previously identified sites or broad locations will be reassessed for any changes in circumstances which may now make the development deliverable.
- If necessary and prudent the Council will consider the benefits of undertaking a further call for sites.

3.37 In the event that insufficient land still remains and there is clear evidence that strategic policies cannot meet the needs of the area, factoring in the constraints, the Council will establish whether the needs may be met in neighbouring areas through preparation of statements of common ground in accordance with the duty to cooperate.

3.38 If the plan of action outlined above fails to yield sufficient sites and broad locations to meet the need, the Council will need to prepare and demonstrate robust reasons why it is unable to meet the need and fully explain this during the Plan examination.

Stage 5: Final Evidence Base

3.39 Following the completion of the assessment, as outlined in stages 1 to 4 above, the outputs listed below will need to be provided:

- A list of all the sites and broad locations that have been considered cross referenced to their location on a map.
- An assessment of each site or broad location, including:
 - Where these have been discounted, evidence justifying the reasons given.
 - Where these are considered suitable, available and achievable, the potential type and quantity of development, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when;
 - An indicative trajectory of anticipated development based on the evidence available.

Monitoring

3.39 A full re-survey of sites and broad locations will normally take place when the development plan has to be reviewed or when there are other significant changes such as new guidance or changes in circumstances.