

Rother District Council

Additional Agenda Item: 6.2

Report to - Cabinet
Date - 7 January 2013
Report of the - Director of Services
Subject - Local Plan Core Strategy – Soundness Issues

Recommendation to COUNCIL: That in response to the Local Plan Core Strategy Inspector's letter dated 13 December 2012:

- 1) the Director of Services, in liaison with the Cabinet Portfolio Holder for Strategic Planning, be authorised to:
 - a) Undertake additional Sustainability Appraisal of the proposed Main Modifications to the Core Strategy, as set out in Appendix 1; and
 - b) Submit proposed Main Modifications to the Core Strategy, together with any additional consequential changes, subject to (a) above, in order to achieve the level of housing set out in the South East Plan; and
 - 2) the Modifications proposed during the course of the Hearings, as contained at Appendix 2, be endorsed.
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Head of Service: Tim Hickling
Lead Cabinet Member: Councillor Mrs George

Introduction and Purpose

1. This report is presented to enable Members to give early consideration to the "preliminary conclusions" of the Inspector conducting the examination into the soundness of the Council's Local Plan Core Strategy. These are set out in a letter dated 13 December, which has been circulated to all Members and published on the Council's website, and to which a response is sought by 18 January.
2. The nature of the issues raised by the Inspector is reviewed below. It should be emphasised that the Inspector's letter only reflects her current thinking on the fundamental matters; it does not imply any view on other matters raised during the Hearing sessions which took place during November or her consideration of other outstanding representations.
3. Nevertheless, given that the issues raised would, if not addressed, mean that the Core Strategy would not be found 'sound' and hence lead to significant delays in adoption, an early and specific response is regarded as being in the best interests of achieving a "plan-led" basis for development in the District.

4. As the proposed changes are significant it is necessary to gain Full Council approval for them. This can be considered at the extraordinary meeting being held on 21 January. The Inspector will be advised of this timescale.

Key Issue

5. The central issue is that of housing numbers. As Members may be aware, there is a legal requirement for the Core Strategy to be in '*general conformity*' with the South East Plan. In terms of housing provision, the South East Plan (SEP) sets a target of 5,600 dwellings for the District between 2006 and 2026.
6. The Inspector notes that, taking into account completions 2006-2011 and the 2 years longer period of the Core Strategy, it is only seeking to provide between 77% and 85% of the SEP requirement.
7. The Inspector does not accept that the Council's reasons for its lower housing target (namely the delay of the Bexhill to Hastings Link Road, the economic downturn and the loss of housing areas around Hastings and at Rye) justify a reduced overall amount of housing. She states that "*my initial conclusion is that the significant shortfall in housing provision, compared to the SEP target, means that the LPS is not in general conformity with the SEP.*"
8. In addition, Local Plans must now also be consistent with the policies in the Government's National Planning Policy Framework. In relation to housing provision, NPPF paragraph 47 includes the requirement to meet the full, objectively assessed needs for market and affordable housing in the housing market area as far as is consistent with the policies set out in the Framework.
9. While acknowledging that different approaches yield greatly contrasting results, the Inspector believes that the Council's (and Hastings Borough Council's) figure of 350-500 dwellings a year "*is a range which reflects the Councils' views of what they consider to be an appropriate level of housing growth, bearing in mind the various environmental and other policy constraints identified*" but does not correspond with the concept of the full, objectively assessed need referred to in the Framework.
10. Without a clear view of what the objectively assessed need is, the Inspector regards the only robust figure available at this time as the SEP requirement. She invites the Council to reconsider the strategy for housing provision and suggests that "*One possible approach would be to revert to the SEP figures, as included in earlier versions of the Plan, and include a commitment to an early review of the Plan to ensure full compliance with the Framework.*"

Response

11. To achieve the SEP's housing requirement over the plan period, including the undersupply since 2006, means that the Core Strategy housing target would need to be increased by some 700 - 1,100 dwellings to 2028. However, the impact on the requirement for new allocations is not so great if due regard is had to small windfall and exception sites, as explained below.

Allowance for rural exception sites and small site windfalls in years 5-10

12. The Proposed Submission Core Strategy only makes allowance for small site windfalls in the last 5 years of the plan period; however, it was presented at the Hearings that this was conservative, being based on the former PPS3, and that account should also be taken of such windfall sites in years 5-10, along with the delivery of exception sites in accordance with the Council's programme. There was no real argument that this was an unreasonable assumption.
13. Indeed, the Inspector does not suggest that this is unreasonable, but comments that such sites "*would generally be included in annual figures of housing completions, thereby reducing any residual requirement.*" On this basis, it is reasonable to include them in the total housing target at the outset.
14. If these further windfall provisions were allowed, the need for new allocations would be some 400-800 dwellings, or 600 dwellings at the mid-point.
15. Even so, this is a significant additional provision, amounting to an approximately 15% increase to the current 3,700-4,100 dwellings. While it remains your officers' view that the Local Plan Core Strategy, as submitted, properly reflects the local vision for development and change across the district, there are opportunities to increase the housing provisions without fundamentally undermining the overall strategy (although clearly with some impacts), which may be considered if Members agree to achieving the South East Plan housing target up to 2028. These opportunities are presented below.

Bexhill

16. The scale of growth previously consulted upon in the 'Strategy Directions' document, of some 160 dwellings/year, was reduced in the Proposed Submission Core Strategy to 121-332 dwellings/year due to delays in Link Road construction and difficulties in the higher growth being matched by job creation, especially when viewed against a backdrop of weak economic conditions and the lack of progress on other transport infrastructure schemes.
17. This is a legitimate concern, not only in terms of the local vision that Bexhill is "*attractive to families, the young and elderly alike*", but also in terms of the sub-regional priority, as expressed in the SEP, 'to improve the balance of homes and jobs'. Without a good supply of jobs, more housing on its own will make access to jobs harder, encourage greater out-migration of younger, economically active people and, conversely, attract more pre-retirement and retirement in-migration, thereby increasing the demographic imbalance and the availability of skilled labour.
18. However, there is now a good prospect that business units will be built at North East Bexhill at the same time as housing, if not in advance. This not only means that the area will be more able to support economic growth, but that there will be an improved supply of jobs.
19. The Core Strategy already identifies 'broad locations for future growth'. Subject to further detailed work, the various assessments undertaken to date including the Strategic Housing Land Availability Assessment (SHLAA),

suggest that, taken together, these are capable of yielding more than the figure of up to 450 dwellings currently required in these areas. Provision may also be made elsewhere across the town, although the Strategic Housing Land Availability Assessment (SHLAA) showed very limited other opportunities.

20. There is capacity to increase the upper level of housing in Bexhill over the period 2011-2028 from 2,250 dwellings to 2,700 dwellings (including small site windfalls) without any changes to the broad locations identified on the Core Strategy Key Diagram. This is an increase of 16%¹ on a like for like basis.
21. It is considered that this level of growth is a “stretch target”, representing an average build rate of 159 dwellings/year, well above the average of 108 dwellings/year over the last 20 years (although less than the 181 dwellings/year between 1996-2001). Further consideration is given to employment land supply and phasing below.

Hastings Fringes

22. As a ‘regional hub’, Hastings should be the most sustainable location for growth. In total, some 200-450 dwellings were originally consulted upon, but the larger sites were dropped due to fundamental environmental constraints. Moreover, the SHLAA did not reveal much other potential, hence the Proposed Submission Core Strategy envisages only 55-80 net additional dwellings over the Plan period.
23. Land south of Battle Road, adjacent to Breadsell Farm, was a key contributor to the original proposals for the Hastings Fringes, with capacity for up to 200 dwellings in Rother and up to 800 dwellings in Hastings. However, Natural England made a strong objection to this on the basis of potential impact on the Marline Valley SSSI. It requires further, detailed monitoring to determine if this objection can be overcome.
24. Therefore, while the situation may be reviewed in the future, there is insufficient evidence to rely on such a proposal now. Hastings Borough Council is not promoting the site for development in its plan. Also, it is still considered that a smaller-scale development would not be capable of supporting the infrastructure needed to make it a “sustainable urban extension”.
25. However, the possibility of some additional housing on the fringes of Hastings falling within Rother, essentially within the existing development boundary (without losing deliverable employment sites), is likely, such that the target may be increased to 100 dwellings.

Battle and Rye

26. Battle is already being asked to accommodate a significant proportion of development and there are both environmental and town centre traffic issues that limit further growth of this historic small High Weald town. There has been little argument on the proposed scale of housing of 400-440 dwellings (excluding small site windfalls in years 5-10) during the examination, while on-

¹ i.e. excluding small site windfalls in years 5-10, as these were excluded originally.

going work with Battle Town Council confirms that this target range is a “stretch” but potentially achievable target.

27. There are demonstrable site development constraints affecting the deliverability of existing key sites at Rye, as evidenced at the Hearing. Also, the SHLAA has shown very little further potential. Even the mid-point of the current range of 250-350 dwellings may require some further, not yet identified sites to be forthcoming, perhaps through redevelopment. It is concluded that it is not possible to increase housing provisions at Rye, other than to allow for small site windfalls in years 5-10.

Rural Areas

28. Most villages are situated in the High Weald AONB, and they are already being asked to accommodate a significant amount of new development (certainly relative to AONB villages in adjacent districts).
29. In response to the Inspector’s comment that the levels of growth proposed in the SEP took account of the AONB designation covering much of the District, it is noted that the scale of growth in the villages (and Battle) is little changed from that proposed in the earlier ‘Consultation on Strategic Directions’, which met the SEP housing target.
30. While it is the case that the SHLAA identifies more than the required number of sites to meet the current housing target for the Rural Areas, the SHLAA’s purpose is to demonstrate the deliverability of the strategy. It should not be relied upon to indicate that such sites are suitable, developable and deliverable. This requires further work at the site allocations stage, at which point other potential land uses will also be considered.
31. More critically, as the Inspector notes, the cumulative impact of development on the character of settlements and the wider, mainly AONB, landscape is not taken into account in the SHLAA. However, this is reflected in the Rural Settlements Study which supports the general scale of development proposed.
32. It is accepted that the total housing target for the villages of 950-1,000 dwellings is less than the upper limit in the proposed Submission Core Strategy Figure 12 of 1,150. To attain a house building level closer to the upper figure, the expectation would be that villages seek to achieve the upper level in the range. In practice, on-going work with Parish Councils is progressing on this basis.
33. At this point, while recognising that it will not always be possible to meet the upper level in all villages – but that there may be a little more potential in other villages – it is considered that a commitment may be given to achieve a higher overall figure of 1,080 dwellings (excluding further small windfall sites), for the villages overall without revisiting the figures for each individual village (which is not considered to have been justified during the Hearings).
34. This approach would need to be supported by a clearer commitment to seeking to achieve higher levels unless there are substantial and demonstrable reasons for not doing so. This may be done by strengthening the existing caveat in Policy RA1(v) that allows numbers to be refined in the Development and Site Allocations Plan/Neighbourhood Plans.

Overview

35. The following table shows how the above revised housing targets would meet the SEP housing requirement of 4,803 dwellings 2011-2028.

	Core Strategy housing target	Proposed housing target to meet South East Plan
Bexhill	2,050 – 2,250 dwellings	2,700 dwellings
Hastings fringes	45-80 dwellings	100 dwellings
Battle	400-440 dwellings	410-450 dwellings
Rye	250-350 dwellings	260-360 dwellings
Villages	950 -1,000 dwellings	1,270 dwellings
Total	3,700 – 4,100 dwellings	4,810 dwellings
Annual average	229 pa (mid-point)	283 dwellings pa

36. However, it should be noted that Exception Sites and small site windfalls in years 5-10 were not included in the Proposed Submission Core Strategy totals. The table below shows the figures now proposed but excluding these sites to illustrate the changes on a like-for-like basis.

	Approximate housing levels 2011-2028	
	Proposed Submission Core Strategy	Target to meet South East Plan excluding years 5-10 small site windfalls and exception sites
Bexhill	2,050 – 2,250 dwellings	2,620 dwellings
Hastings fringes	45-80 dwellings	100 dwellings
Battle	400-440 dwellings	400-440 dwellings
Rye	250-350 dwellings	245-345 dwellings
Villages	950 -1,000 dwellings	1,080 dwellings

37. Members are advised that this overall scale and distribution is similar to that previously proposed in the 'Consultation on Strategy Directions'.

Sustainability Appraisal

38. The Sustainability Appraisal (SA) concluded that, on balance, a lower rate of housing than the SEP would be more sustainable as it would have less impact than redistributing development elsewhere in the District due to delay in Link Road construction postponing development at North East Bexhill in particular. Further factors were the availability of jobs in a much poorer economic context and site development constraints at Rye.
39. In reaching this conclusion, the SA properly gave weight to the additional pressure on critical environmental resources, including the High Weald AONB. However, as discussed in the Bexhill section above, there are grounds to be more optimistic about the rate of business development at Bexhill than the SA assumed. Hence, an initial assessment is that a revised SA based on the increases in line with the SEP, as set out above, would be more balanced.

40. Further SA work is required to systematically assess the sustainability merits of the revised approach prior to submission to the Inspector. This is in hand and should inform Full Council's consideration.

Employment, retail and transport provisions

41. The biggest impact of the above proposed modifications on employment and retail provision would be at Bexhill. It could yield a demand for an additional 340² jobs in business/industrial areas. While this will impact on job supply over the full plan period³, it only represents an increase in planned business floorspace of 7.5%. While this is perhaps marginal, more new housing in the short term could exacerbate competition for available jobs. In addition to the phasing policy proposed below, this places more emphasis on securing business space in association with new housing wherever possible.
42. In terms of retail provisions, it is considered that lower retail growth forecasts may counter-balance a reversion to SEP housing growth. A further retail study would be warranted at Bexhill as part of the SA work but, subject to this, the broad scale of provision in the Core Strategy for the towns (which relate to qualitative as well as quantitative needs) is still considered appropriate.
43. The Inspector appreciates that, aside from the Link Road, other planned transport schemes are not "showstoppers" in terms of facilitating development. However, in the context of more housing, these are arguably even more important in terms of improving access to jobs. Therefore, further encouragement should be given to the relevant agencies for delivery of the Tonbridge-Pembury A21 scheme, the investigation of online improvements at Baldslow and increased rail line speeds in particular.

Phasing

44. Consideration has been given to the phasing of housing to align broadly with likely job growth. There is a 'prima facie' case for looking to plan for an increasing rate of house building over time as the economic well-being of the area improves (from what is acknowledged as a low base). There is no doubt that there is an outstanding need for increased job opportunities from the existing population to be met, as well as balancing new housing with jobs. Indeed, this can be regarded as the immediate priority.
45. However, it is difficult to place a definitive rate of job growth. Also, there is an argument that house building will stimulate economic activity, most notably as a result of mixed-use developments. Rather than set a definitive phasing at this stage, it is proposed to amend the existing phasing policy (Policy IM3) in the Core Strategy to enable further consideration of phasing of housing and jobs growth for individual settlements as part of the site allocations process.

Supply of housing land

46. In the short term, a most notable effect of increasing the housing target is its impact on deliverable housing land supply. There is on-going consideration of

² based on the average household size at 2011 Census of 2.20, and proportion of economically active population (39,859) as a percentage of total population (90,588). All figures are for Rother District.

³ If a third of all jobs were provided for on business sites, this would require some 4,500sqm of floorspace, equivalent to 7.5% increase on the planned 60,000sqm.

different approaches to calculating the 5-year housing land supply position as part of the Core Strategy examination process. Inevitably a higher overall housing target increases the amount of land needed to be available now.

47. Hence there may well be a short-term issue with additional pressure to allow residential development in order to maintain a sufficient supply of deliverable sites.

Future consideration of housing needs

48. The Inspector is not satisfied that there is an up-to-date 'objective assessment of housing needs'. It is considered that such an assessment would benefit greatly from the availability of the migration and workplace data from the 2011 Census. It is understood that this is not due to be published before October 2013.
49. At present, there is no clear methodology for assessing housing "need" in the housing market area. While it is acknowledged that demographic projections are becoming the starting point for work in this area, it is still believed that it is reasonable to have regard to the economic needs of an area. No doubt, this will be clarified in due course.
50. The Inspector's proposal for an early review of the Core Strategy to take account of further work on housing needs is accepted. This will also enable such work to tie in with that recently required of Wealden District Council in adopting its Core Strategy.

Proposed Modifications

51. The main modifications that would need to be made to the Proposed Submission Core Strategy to achieve the higher level of housing as contained in the SEP are set out in the schedule at Appendix 1 for Cabinet consideration. There may be other consequential amendments.
52. In addition, during the course of the Hearings, officers suggested 4 modifications to address particular issues raised in relation to the presumption in favour of sustainable development, business land, tourism, and for Fairlight (agreed with Fairlight Parish Council). These are set out at Appendix 2 and Cabinet's views on these are also sought.

Conclusion

53. While there are reservations about increasing the housing provisions in the Local Plan Core Strategy, it is clear from the Inspector's letter that the Council needs to at least seek to achieve the existing SEP target, in acknowledgement of the Government's push for house building. The proposed modifications are regarded as the most sustainable way of doing this, notwithstanding the reservations.
54. Looking ahead, there will be the opportunity for interested parties to comment on all 'main modifications' to the Proposed Submission Core Strategy. This must be a public consultation for at least 6 weeks. Representations on Proposed Modifications will be considered by the Inspector before her final report is made. We will be guided by the Inspector on the timing of this consultation, but it may necessitate further Hearings.

55. While this situation will inevitably impact on the final adoption of the Core Strategy, every effort is being made by officers to minimise this delay and to continue to progress site allocations work.

Anthony Leonard
Director of Services

Risk Assessment Statement

Unless modifications are proposed, the Core Strategy is likely to be found unsound. This would have substantial impacts on the proper planning of development across the district. Further delay would also mean that the South East Plan itself would provide less of a useable strategic context, and raise further questions over the basis of sound planning.

Appendix 1

Rother District Council Local Plan Strategy

Schedule of Proposed Main Modifications

January 2013

(as approved by full Council on 21st January 2013)

Rother District Council Local Plan - Schedule of Main Proposed Modifications to the Core Strategy

Modification ID	Document (Page No.)	Modified text (deleted text shown as struck through and additional text shown in bold and underlined)
Chapter 2 – Policy Context		
PM1	p8	<p>Insert additional paragraph after paragraph 2.5 (As contained in the Proposed Submission Core Strategy –incorporating focused amendments in accordance with Minor Amendment MA2.1)</p> <p><u>Recognising that the National Planning Policy Framework requires an up to date objective assessment of housing needs across housing market areas, the Council will undertake an early review of this Strategy, including its housing provisions, in close liaison with neighbouring local planning authorities.</u></p>
Chapter 4 – Main Issues		
PM2	p18	<p>Amend 2nd paragraph under 'Managing Uncertainties' to read:</p> <p>The most significant infrastructure uncertainty relates to the impending decision on the Bexhill to Hastings Link Road. Planning permission was granted in July 2009, and the Secretary of State has approved the Compulsory Purchase Orders and granted provisional funding approval. Final funding approval is expected shortly. A significant delay, or cancellation, would have clear implications on the strategy as well as on housing and delivery and job creation. This is considered more fully in Chapters 7 and 8.</p>
Chapter 7 – Overall Spatial Vision		
PM3	p31	Amend Paragraphs 7.22 and 7.23 in the light of the further Sustainability Appraisal work.
PM4	p32	Amend paragraph 7.28 to read:
		It is concluded that an appropriate overall target for net additional housing in the district over the period from April 2011 to March 28 (17 years) should be some 3,700 <u>4,100</u> 4,810 dwellings, or an average of 248 <u>244</u> 283 dwellings/year.
PM5	p32	Delete paragraphs 7.29 and 7.30.
PM6	p34	Amend Policy OSS1 Overall Spatial Strategy (i)
		(i) Plan for an additional 3,700 <u>4,100</u> 4,810 dwellings (net) in the district over the period 2011-2028;
PM7	p35	Amend paragraph 7.44 to read:
		7.44 As stated above, the level of housing growth in line with this strategy is set as a range, 3,700–4,100 dwellings at

		<p>4,810 dwellings. This also provides a degree of flexibility when individual sites are assessed. The exact distribution will be refined when allocations are subsequently brought forward.</p>																								
PM8	p35	<p>Amend the Housing column in Figure 8 to read:</p> <table border="1" data-bbox="395 743 635 1635"> <thead> <tr> <th colspan="3">Approximate development levels 2011-2028</th> </tr> <tr> <th></th> <th>Housing</th> <th>Employment</th> </tr> </thead> <tbody> <tr> <td>Bexhill</td> <td>2,050 2,700 dwellings</td> <td>60,000 sq.m</td> </tr> <tr> <td>Hastings Fringes</td> <td>45-80 100 dwellings</td> <td>At least 3,000sq.m</td> </tr> <tr> <td>Battle</td> <td>400-440 410 - 450 dwellings</td> <td>10,000sq.m</td> </tr> <tr> <td>Rye</td> <td>250-350 260 - 360 dwellings</td> <td>10,000-20,000sq.m</td> </tr> <tr> <td>Villages</td> <td>950-1,000 1,250 dwellings</td> <td>10,000sq.m</td> </tr> <tr> <td>Total</td> <td>3,700-4,100 4,810 dwellings</td> <td>93,000 – 103,000sq.m</td> </tr> </tbody> </table>	Approximate development levels 2011-2028				Housing	Employment	Bexhill	2,050 2,700 dwellings	60,000 sq.m	Hastings Fringes	45-80 100 dwellings	At least 3,000sq.m	Battle	400-440 410 - 450 dwellings	10,000sq.m	Rye	250-350 260 - 360 dwellings	10,000-20,000sq.m	Villages	950-1,000 1,250 dwellings	10,000sq.m	Total	3,700-4,100 4,810 dwellings	93,000 – 103,000sq.m
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PM9	p36	<p>Delete paragraph 7.49 and amend paragraph 7.50 to read:</p> <p>7.50 The table at Appendix 3 summarises the local housing targets together with the housing land supply position at April 2011. Taking account of outstanding planning permissions, there is a need to provide for a further 2,400-2,800 3,630 dwellings in the District as a whole between 2011 and 2028.</p>																								
PM10	p36	<p>Amend paragraph 7.51 to read:</p> <p>Sites for new development will be set out in due course through a Development and Site Allocations DPD. Existing Local Plan housing (and other) allocations will be subject to review as part of the Site Allocations DPD. These allocations amount to some 1,750 dwellings which, if these are all carried forward, would still require some additional 770-1,170 1,880 dwellings need to be planned for to meet the overall target.</p>																								
PM11	p36	<p>Delete paragraphs 7.52 and 7.53 and replace with new text to read:</p> <p>Government policy in the National Planning Policy Framework states that: “Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply.” It adds that: “Any allowance should be realistic, having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.”</p>																								
PM12	p37	<p>Delete paragraphs 7.56 and paragraph 7.57 and replace with new text to read:</p> <p>Given Rother’s past record of fairly consistent small site windfall developments, an allowance for these is made in years 5-10 and 10-15, at rates of 47 dwellings and 45 dwellings a year respectively. This compares with some</p>																								

		<p><u>90 dwellings a year on small site windfalls over the last 10 years. The future allowances do not include any provision for redevelopment on garden land.</u></p> <p><u>Further allowance may be made for the delivery of affordable housing “exception sites” in accordance with the Council’s programme. This amounts to some 65 dwellings, all of which would be in the rural areas. This programme is underway with several sites currently being progressed.</u></p> <p><u>Taking the above windfall allowances into account, the outstanding requirement for further allocations is some 1,355 dwellings.</u></p>
PM13		Delete Policy OSS2 Bexhill to Hastings Link Road and development upon confirmation of full funding and construction of the link road.
Chapter 8 – Bexhill		
PM14	p51	Delete paragraphs 8.48 and 8.49, and replace with text that reflects the current position:
PM15	p51	<p><u>8.48 The scale of development envisaged at Bexhill has been predicated upon early construction of the Bexhill to Hastings Link Road. Although delayed by several years, final approval is expected very shortly.</u></p> <p>Amend paragraph 8.52 to read:</p> <p><u>8.52 Therefore, and given likely employment growth, A housing target of some 2,450 2,700 new dwellings between 2011 and 2028 is considered appropriate over the Plan period, and equates to an average of some 129–159 dwellings a year. It is recognised that this is well above the average house building rate over the last 20 years, and will place an added weight on initiatives to stimulate job growth. Hence, particular emphasis will be given to schemes that bring significant employment benefits.</u></p>
PM16	p51	<p>Amend paragraph 8.53 to read:</p> <p><u>8.53 It is anticipated that a lower the rate of housing development will take place before will, following construction of the Link Road, primarily for business land supply and infrastructure reasons, increasing to some 150 dwellings a year in the later phase of the Plan, which is equivalent to the rate of house building over the last 5 years. Increase quickly to the annualised target. However, in the event that the housing market does not support such a high rate of growth in the early years and/or if job creation is not being realised, consideration will be given to a phasing of development in accordance with Policy IM3 through the site allocations process.</u></p>
PM17	p52	Delete paragraphs 8.54 and 8.55.
PM18	p52	<p>Amend paragraph 8.56 to read:</p> <p><u>8.56 There are outstanding commitments for some 300 dwellings. Deducting these from the total leaves a requirement to identify sites for some 1,700–1,900 2,400 additional dwellings.</u></p>

PM19	p52	Amend paragraph 8.58 to read: 8.58 Allowing a reasonable estimate for small sites coming forward, further allocations are needed for some 250-450 825 dwellings. The SHLAA indicates some potential within the existing built-up area, as well as several sites around the northern and western edges of the town. Development to the east would erode the marginal but critical open countryside gap to Hastings.
PM20	p53	Amend paragraph 8.61 to read: These areas will be the focus of attention in accommodating the additional housing requirement. but The scale, timing and locations will <u>ideally</u> be determined at the site allocation stage. This is the most appropriate time to assess in further detail the key issue of the capacity of the A259 and local roads, as well as specific development issues.
PM21	p53	Amend Policy BX3 (ii) and (iii) Development Strategy to read: <i>(ii) An overall level of housing growth of some 2,050-2,250 2,700 dwellings between 2011-2028, the precise number being dependent upon the timing of construction of the Link Road, but will accord broadly with the phasing set out at paragraph 8.54; (iii) Over and above development opportunities within the existing urban area, new housing and business development will be focused on a strategic site to the north east of the town (as already planned), together with further sites to the north and west of the town, the scale, timing and locations of which will <u>ideally</u> be determined through the Site Allocations process; and</i>
Chapter 9 - Hastings Fringes		
PM22	p56	Amend paragraph 9.15 to reflect revised housing numbers: The Strategic Housing Land Availability Assessment (SHLAA) identified only little potential for sustainable housing development along the fringe in recognition of the constraints in this area. Hence, housing numbers are limited to 45-80 100 dwellings, some of which will be achieved through outstanding permissions.
PM23	p56	Amend Policy HF1 (vi) to read: (vi) Provide 45-80 100 net additional dwellings between 2011 - 2028.
Chapter 10 – Rye and Rye Harbour		
PM24	p64	Amend Policy RY1 (v) to read: (v) Provide between 250 and 350 260 and 360 dwellings net additional dwellings between 2011 and 2028. Opportunities for growth will primarily be sought within the built up area of Rye;
Chapter 11 - Battle		
PM25	p70	Amend Policy BA1 (iii) to read:

		<p>(iii) Provide for 400-440 410 – 450 net additional dwellings in Battle over the Plan period 2011-2028, by developing new housing via opportunities both within the development boundary, and modest peripheral expansion opportunities that respects the setting of Battle within the High Weald AONB and supports community facilities;</p>																																								
Chapter 12 – Rural Areas																																										
PM26	p75	<p>Amend paragraph 12.13 to read:</p> <p>12.13 The district-wide distribution of housing in Section 7 suggests that the villages should accommodate 950-1,000 1,270 additional dwellings over the period 2011-2028, which will necessitate new allocations in the area. Much of these dwellings have already been accounted for via existing commitments so that the residual requirement for additional allocations is for some 400 dwellings 2011-2028 (as set out in Appendix 3).</p>																																								
PM27	p80	<p>Amend Policy RA1(v) to read:</p> <p>(v) In order to meet housing needs and ensure the continued vitality of villages, the provision of 950-1,000 1,270 additional dwellings (comprising both existing commitments, and new allocations and windfalls) in villages over the Plan period 2011 to 2028. This will be located in accordance with Figure 12, subject to refinement in the light of further investigation via the Development and Site Allocations DPD and/or Neighbourhood Plans, but the expectation is that individual villages should achieve the upper end of the range, unless there are clear and demonstrable adverse impacts of so doing.</p>																																								
PM28	p81	<p>Amend Figure 12 row 1, column 5, to read:</p> <p>Total New Housing 2011-2028 Requirement is 950-1,000 4,810</p> <p>Amend Figure 12, last 4 rows to read:</p> <table border="1" data-bbox="970 741 1204 1635"> <tr> <td colspan="5">Exception sites and small site windfalls allowance in years 5-15:</td> </tr> <tr> <td>Total</td> <td>457</td> <td>524</td> <td>183</td> <td>505</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td>825</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td>1,014</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td>Mid-Range-identified is 986</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td>is 986</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td>required</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td>Mid-Range-identified is 986</td> </tr> </table> <p>Note: Figures do not include three exception sites at advanced stages (Brede – 12, Pett – 10 and Ewhurst – 8).</p>	Exception sites and small site windfalls allowance in years 5-15:					Total	457	524	183	505					825					1,014					Mid-Range-identified is 986					is 986					required					Mid-Range-identified is 986
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PM29	p81	<p>Insert additional text after Figure 12, to read:</p> <p>'Proposed New Allocations' in Figure 12 refers to sites formally allocated via the Development and Site Allocations DPD or Neighbourhood Plans. These will normally comprise development sites accommodating 6 or more dwellings.</p>																																								

		<p><u>Previously unidentified large sites (6 dwellings and over) in a village gaining planning permission before adoption of the relevant DPD/Plan may be deducted from the total 'Proposed New Allocations' that an individual village is expected to achieve, depending on the stage reached and the suitability of other potential sites.</u></p> <p><u>Developments of less than 6 dwellings, on currently unidentified sites, will count towards the overall rural housing numbers total as 'small-site windfalls'; an estimated allowance for them has been included for years 5-15. Therefore, to avoid double counting, they are in addition to the 'Proposed New Allocations' for individual villages.</u></p> <p><u>Affordable housing 'Exception sites' are typically between 6 and 14 dwellings. In common with small site windfalls, they are dealt with in a separate row on Figure 12. Hence, they cannot be deducted from the 'proposed new allocations' totals for villages, since to do so would entail double counting. The estimated number of 65 dwellings on 'Exception sites' across the rural areas for the plan period is based upon figures derived from the Council's Housing Strategy.</u></p>
<p>Chapter 19 - Implementation PM30</p>	<p>p165</p>	<p>Amend Policy IM3(ii) to read:</p> <p>(ii) consider phasing further housing land releases where it is important for the assimilation of development into a community <u>and/or to ensure a balance with the supply of jobs in the area;</u></p>
<p>Appendices</p>		
<p>PM31</p>	<p>p190</p>	<p>Amend Appendix 3 Housing: Component of Housing Supply as overleaf:</p>

Housing Requirements for Plan Period 2011 to 2028

Housing Requirements	Number of dwellings						Total
	Bexhill ¹	Hastings Fringes	Battle	Rye & Rye Harbour	Villages		
Total housing requirement 2011-2028	2,060 2,450 ² 2,700	45-90-100	400-440 410-450	260-260 260-260	960-1,000 1,210	2,740 4,100 4,810	
Total Outstanding Permissions	311	44	286	168	304	1,177	
Current allocations (including reserve sites)	1,411	0	14	170	160	1,755	
Total Commitments (Permissions and Allocations)	1,722	44	300	330 ³	524	2,932	
Estimated small site windfalls in years 5-10	78	1	15	17	124	235	
Estimated small site windfalls in years 10-15 ³	75	1	15	16	118	225	
Exception Sites Allowance	N/A	N/A	N/A	N/A	65	65	
Total permissions, allocations and windfalls	4,202	46	344	366	642	5,560	
Total Allocations required (existing and new)	4,884-4,984	0-36	353	372	654	5,643-5,748	
Further allocations required - scheme	2,246	54	111	170	299	3,170	
Further allocations required - reserved	268-460	0-36	82-125	3 ³	268-368	610-843	
Total 2011-2028 - required by mid-point	825	54	172	0-150	439	1,353	
Total 2011-2028 - required by mid-point	260-450	0-26	406	0	240-300	550-650	
Total 2011-2028 - required by mid-point	2,674	56	462	366	437	4,768	
Total 2011-2028 - required by mid-point	2,160	62	426	346	376	3,992	
Total 2011-2028 - required by mid-point	2,700	100	430	310	1,270	4,810	

¹ Delivery at Bexhill is heavily dependent upon confirmation of funding of the Link Road.
² There is a degree of uncertainty regarding delivery of existing commitments at Rye, which accounts in part for lack of additional allocations.
³ Based on rate of small site windfalls at 50% of rate over period 2000-2010.