

## Rother Housing Supply Numbers

1. On 14 January 2021, Rother Planning Meeting considered a paper by officers about the housing land supply position.

<https://rother.moderngov.co.uk/ieListDocuments.aspx?CId=135&MId=539>

2. What was of particular concern were paragraphs 14, 18 and 19 (Copied below).

"14. As the presumption in favour of sustainable development now applies to these 'made' NP areas, development is no longer constrained by policies in the adopted NP.

18. 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.

19. 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 within the District, including Neighbourhood Areas that have a 'made' NP. 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 and other nationally and internationally important designations."

3. On behalf of the RNPSG, and in advance of anything from the Informal Rother Neighbourhood Plan Group, Colonel Anthony Kimber asked Head of Rother Planning what was the significance of this change on Rother Neighbourhood Plans in general and the Rye Neighbourhood Plan in particular.

4. Head of Rother Planning wrote:

"I am sure you will be familiar with the five-year housing land supply position statement from your work through the Rye Neighbourhood Plan and that the District Council is required, on at least an annual basis, to produce this document. The Planning Practice Guidance (PPG) sets out that for decision-making purposes, an authority will need to be able to demonstrate a five year housing land supply when dealing with applications and appeals. The document, which is a factorial document on the Housing position as at 1<sup>st</sup> April 2020 (not today) and is being presented for noting at Thursday's Planning Committee fulfils the requirement. The previous version of the housing land supply document was at 1<sup>st</sup> April 2019.

The PPG details that the housing requirement set out in adopted strategic housing policies should be used for calculating the five-year supply. However, where the plan (in our case the Core Strategy) is more than five years old, then the five-year housing land supply figure will be measured against the area's Local Housing Need (LHN) calculated using the standard method. This increases the housing requirement from 335 dwellings per annum - dpa (under the Core Strategy requirement or 484 dpa taking into account the under-delivery since 2011) to 736 dpa (under the standard method). Due to the considerable uplift in the housing figure from the adopted CS target to the LHN figure set out in the PPG, the Council is only able to identify 2.87 years of housing supply.

The implication of not having a three year supply means now that those areas with 'made' Neighbourhood Plans no longer enjoy the protections which they had previously, meaning that planning applications in these areas should now be considered in the context of paragraph 14 of the National Planning Policy Framework, as set out in the report. As such, 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' NP. This is the same position as the rest of the district without NPs

However, this does not mean that the respective Neighbourhood Plans should be discarded but the weight attached to the policies within them need to be considered against the benefits that additional housing would bring although, as set out in the report, this will depend to some extent on local circumstances, including the impact on the High Weald AONB and other nationally and internationally important designations. This situation has parallels with what the rest of the district has been experiencing for some years and I can assure you that it has not meant that those policies contained within the adopted Core Strategy and Development and Site Allocations Local Plan are no longer considered. Policies contained in all these documents, including the 'made' Neighbourhood Plans still form part of the Development Plan. I understand that this report will be disappointing but as set out this does not mean the respective Neighbourhood Plans are no longer relevant.

I would also take this opportunity to mention, as I am sure you are already aware, that although we are at the early stages Rother are working hard to bring forward their new Local Plan. This Plan, once adopted, will establish a new housing target for this district and help to ensure that a realistic figure for the area under which we can establish a housing land supply going forward."

5. This advice somewhat clarified the position and the Rye response was as follows.

"I am grateful for your clarification. Of course I am aware of the background and the rules, but as you might imagine after 6 years of voluntary work, to be advised, before the plan is two years old, that the policies no longer apply is rather soul destroying! I take your remarks as below of some consolation.

"but as set out this does not mean the respective Neighbourhood Plans are no longer relevant."

It is a pity that this additional advice did not form part of the briefing paper as some may draw false conclusions.

6. Therefore I believe that Rye Town Council will wish to continue to consider planning proposals for Rye in the context of the Neighbourhood Plan as set out, particularly as the Plan was crafted on the basis of “presumption in favour of sustainable development” which seems to be the new critical reference point.

Colonel Anthony Kimber PhD

Rye Neighbourhood Plan Coordinator

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