

Briefing Note

Project:	Land south of the A271, Hailsham	Date:	9 April 2024
Subject:	Housing Land Supply Response	Reference:	APP/C1435/W/23/3335625

- 1.1 This short note is provided on behalf of the Appellant, and in response to the Council's Appendix to Proof of Evidence of Claire Turner; 'Comments on Housing Land Supply by Stacey Robins', including the commentary on the disputed sites (table 2 therein).
- 1.2 The Council did share some of the table 2 commentary shortly prior to exchange of evidence. Consequently, I have accepted that 15 homes on Land at Sturton Place is deliverable (Table 2 ref 14), which is no longer contested in my evidence.
- 1.3 In Mr Robin's latest, submitted, version of the table, I note that he accepts the delivery rate identified in the HLSS with respect to Land West of Uckfield (site ref 2) is over-optimistic, and that the delivery rate should be adjusted downwards, removing 75 homes from the supply identified in the HLSS. Further that 4 homes should be removed from the HLS with respect to Land at Straight Half Mile (site ref 7).
- 1.4 With respect to 'Land at Coopers Farm, Five Ash Down' (site ref 12), we believe that this is a different site to the one that I have challenged. Mr Robin's references the application WD/2023/2729/MRM, which relates to an application for 35 homes on 'Land West of 5 Ashdown Road, Coopers Green.' The site that I refer to is 'Land at Coopers Farm, Five Ashdown' application reference WD/2021/1895/MOA, for 40 homes, 30 of which are included in WDC's trajectory for the current 5-year period. This, in part, highlights the failure and deficiencies in WDC's own reporting of land supply, including an patent lack of clear evidence to identify the sites, understand their planning status, confirm developer intentions and in turn establish their delivery potential.
- 1.5 The revised positions, starting with the HLSS supply of 5,513, result in the following ***HLS range***:
 - ***WDC 3.78 years***
 - ***tor&co 3.14 years***
- 1.6 The outstanding differences are summarised in the following table.

Site		WDC Total	WDC agreed reduction	tor&co Total	Additional Difference
1	Cuckoo Fields and Ersham Park, Land South of Hailsham	330	-	246	-84
2	Land West of Uckfield	325	-75	186	-64
3	Hesmonds Stud, Waldron Road, East Hoathly	175	-	125	-50
4	Brook View, Land North of Walshes Road, Crowborough	130	-	0	-130
5	Friday Street Farm, Oak Tree Lane, Stone Cross	100	-	50	-50
6	Land adjoining 154 Station Road, Hailsham	12	-	0	-12
7	Land at Straight Half Mile, Maresfield	25	-4	21	0
8	Land East of North Street, Lower Horsebridge	105	-	40	-65
9	Land Off Bexhill Road, Ninfield	65	-	30	-35
10	Land to the East of Benhall Mill Road, Tunbridge Wells	120	-	0	-120
11	Land at Chiddingly Road, Horam	22	-	0	-22
12	Land at Coopers Farm, Five Ash Down	30	?	0	-30
13	Land at Station Farm, Station Road, Berwick	23	-	0	-23
14	Land West of Station Road, Hailsham	75	-	0	-75
15	Mornings Mill Farm, Eastbourne Road, Willingdon	100	-	0	-100
	Small site discount of 7%		-	48	-48
	Sturton Place not contested (remains in starting 5,513)				
TOTALS			-79	698	-908
Revised supply			5,434		4,526*
Requirement			7,200		7,200
HLS positions			3.78 years		3.14 years

*5,513 - 79 - 908