

Please quote: Planning Strategy

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Your ref ID/2



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Mr Richard E Hollox
 c/o Lynette Duncan

By Email only

Dear Mr Hollox

Re Hastings Local Plan – Inspector’s initial thoughts

Thank you for your letter (ref ID/2), setting out your initial thoughts about the Hastings Planning Strategy. We agree that it might be helpful to set up an Exploratory Meeting to discuss these matters in more detail, although subject to your consideration of what we have set out below, you may feel that equally these matters could be dealt with at the Pre Hearing Meeting.

Duty to Cooperate

The Council is confident that we have complied with our legal responsibilities under the Localism Act’s “Duty to Cooperate”. Specifically, the Planning Strategy housing target reflects the full, objectively assessed need for market and affordable housing and is based on a regeneration-led approach to future growth. Our starting point has been that we must be in general conformity with the South East Plan. There is no specific guidance on how objectively assessing housing needs should be approached. What we have shown is that different approaches produce a great divergence in figures. The South East Plan has already sought to redistribute objectively assessed needs. What we have done is to take a considered view on the merits of each of these approaches, recognising in particular that there is no guidance that states demographic projections should be the starting point. Instead our judgement has been that we need a level of housing growth which supports the local economy.

Trend-based dwelling projection figures (your paragraph 2)

We can confirm that the 7,840 figure which appears in paragraph 4.11 of the Planning Strategy does correspond with the 7,493 figure which appears in our background evidence paper - An Assessment of Housing Need in the Hastings and Rother Housing Market Area, May 2012 (HBC/PS/30A). The latter figure is a more recent projection based on 2010 data and is the latest available at the time of compiling the background paper. The former figure is related to earlier 2008 based data.

In order to aid clarity here, the Council is willing to amend the figure contained in paragraph 4.11, or indeed, delete altogether the first 2 sentences of paragraph 4.11. The later would be our preference. This change would be put forward as a minor modification.

Is this trend-based figure the same as the full, objectively assessed needs for market and affordable housing in the Borough? (your paragraph 2)

No, the Council does not believe that the trend-based dwelling projection provides the full, objectively assessed housing needs figure. In response to National Planning Policy Framework (NPPF) paragraph 47, the Council, working together with Rother District Council, has undertaken “An Assessment of Housing



Need in the Hastings & Rother housing Market Area”, May 2012 (HBC/PS/30A). The Assessment highlights that there are different ways of assessing need. It considers all these and takes what the Authorities consider to be a reasonable approach having regard to the strategic objectives for the area.

The Council has considered and tested a range of need (or growth options) as evidenced in the Final Sustainability Appraisal Report (HBC/PS/11). The Council background paper – Explanation of Housing Evidence, 2012 (HBC/PS/47A) draws together those parts of the housing evidence base the Council is relying on to support the Planning Strategy and the Council’s Consultation Report (HBC/PS/05) shows the extent and influence of the consultation process in arriving at the final figure of 3,400 net new dwellings over the Plan period.

The Planning Strategy is designed to meet the full, objectively assessed needs for market and affordable housing.

Paragraph 4.24 envisages a net addition in the housing stock of no more than 3,407 dwellings (your paragraph 2)

The Council’s housing target is not a cap on housing development during the Plan period, the Council’s proposed minor modification (HBC/MA/8 – DS1 first sentence add “at least 3,400 net new homes”) is intended to clarify this point.

The inclusion of empty homes in net additional housing figures (your paragraph 2)

The Council is mindful of Government Policy on tackling empty homes which states that “The Government wants to increase the number of empty homes that are brought back into use as a sustainable way of increasing the overall supply of housing”. The Government’s stance is also reflected in the New Homes Bonus, which is also payable where empty homes are brought back into use.

Given the high number of empty homes in the Borough, far in excess of what is needed for normal market operations (ie churn), the Council has sought to address this issue by developing an Empty Homes Strategy and Action Plan

(http://www.hastings.gov.uk/housing_tax_benefits/improving_homes/empty_homes/#strategy) and employing an Empty Homes Officer. To-date, the Council has had considerable success in bringing empty homes back into use. This success is evidenced in the Empty Homes Strategy. Much has been achieved through the use of empty homes grants, informal negotiation, advice, persuasion and pressure. There is now greater emphasis on enforcement to achieve the Council’s aims, and more recently the Council has begun using Compulsory Purchase Orders (CPOs) to help ensure empty homes are returned to use. The Council is committed to reducing the number of long term empty homes in the Borough. Not only is this in response to utilising what is otherwise a wasted resource, but also because of the contribution empty dwellings can make in assisting the Council to help those residents in housing need. By intervening in this way, the Council is helping to ensure there is a net increase in the number of homes in use within the existing housing stock. Not only is this as valuable in real terms as building new homes, it both spares pressure on limited developable space and improves the condition of existing communities and neighbourhoods.

What steps has the Council taken to ensure this unmet housing need can be accommodated elsewhere? (your paragraphs 3 and 4)

The Council has demonstrated that it can meet housing need within the Borough confines and this forms the basis of the approach adopted in the Planning Strategy having regard to the Hastings and Rother Housing Market Area for the reasons set out above.

Yours sincerely

Tim Cookson
Strategic Planning Manager

