

Please quote: HBC/16 & HBC/17
Date: 22 February 2013
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Mr Richard Hollox, Planning Inspector
c/o Lynette Duncan, Programme Officer
LJD Associates
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Dear Mr Hollox

Hastings Planning Strategy – Follow up from Hearing Sessions and Proposed Main Modifications

Thank you for your letter (ID/9) setting out your preliminary conclusions following the close of the Hearings for the Hastings Planning Strategy Examination in Public. Please find attached a document that brings together the queries raised at the Hearings and the Council's response to these as requested (HBC/PS/17). An updated minor amendments schedule is appended to that report, which corresponds to these queries and the Council's responses as appropriate.

In addition, we have sought to take account of the comments made in your letter (ID/9) as far as possible through the revised main modifications schedule (version 2, dated 21.02.13 attached). Where we have been unable to do so as yet, due to further work being required or queries outstanding, this is explained below.

The following additions are therefore proposed as main modifications:

- We accept the need to add the proposed text as suggested at 4.2. However, this will relate to the Bexhill-Hastings **Link** Road, not Bexhill-Hastings Relief Road as stated in your letter.
- We accept a proposed main modification in terms of the model policy on sustainable development. Our suggested text is set out under reference HS/MM/2 in the main modifications schedule.
- We accept the need to provide additional text regarding the Council's intentions for continual monitoring and the mechanism whereby this will be undertaken. This is included as reference HS/MM/5 in the main modifications schedule.
- We accept your recommendation to include policies NC10 and NC3 of the adopted Local Plan in the Planning Strategy, in order to give further protection to Ancient Woodland and Local Nature Reserves. Work is ongoing to update these policies in light of the most up-to-date information and national guidance, as well as considering whether Local Wildlife Sites should be included. These new policies will result in changes to numbering and referencing being required, particularly in the Protecting the Environment and Monitoring & Implementation chapters, which will be included in further revisions of the minor amendments and main modifications schedules (HBC/PS/02 & HBC/PS/146). We will ensure you have the opportunity to review these before consultation on the main modifications commences.
- We accept your recommendation to remove empty homes from the housing land supply table at 4.24, and re-calculate the small site windfall provision and table 1 to better reflect the Council's response in Matter 3 (specifically table 3.12.1). This work is ongoing.
- We accept your recommendations regarding the timing and extent of consultation regarding the revocation of the South East Plan and will consult on this at the same time as the main modifications.

I would like to seek further advice/clarification however, with regard to the points you make at paragraphs 12 and 13 of your letter. Please could you confirm that your concerns now relate to demonstrating full compliance with the Duty to Co-operate rather than a need to revisit the SHMA or SHLAA work in the absence of the South East Plan? Or are you requesting that a review of this work is undertaken? Is it the shortfall between the trend based figure for homes and the minimum requirement of 3,400 that should form the basis of discussions with Rother District Council, and by inference until a response is received from Rother DC we will be unable to proceed towards the adoption of the Planning Strategy?

The Council did not approach Rother DC in a formal manner to explore the potential of Rother accommodating all or part of the trend based projection above 3,400 because neither Council considered it had unmet housing need based on its assessment of a regeneration led objectively assessed need in line with the South East Plan. However, informal engagement has been ongoing to ensure compliance with the Duty, as demonstrated in the supporting document (HBC/PS/10) and its supplement (HBC/PS/139). We do not consider that the revocation of the South East Plan revokes its evidence base.

I wish to also clarify what trend-based projection figure we should use with our required dialogue with Rother DC. In our letter to you dated 29th November 2012 (HBC/1) we indicated that Planning Strategy paragraph 4.11 could be modified (through the minor modifications route) to reflect the more up-to-date 2010 trend based projection of 7,493 dwellings (referenced at paragraph 35 in the Assessment of Housing Need in the Hastings and Rother Housing Market Area (May 2012)). We believe the trend based figure of 7,493 is the up-to-date figure and is the most appropriate figure to be used. Please could you confirm you are happy with this?

I look forward to receiving your reply at the earliest opportunity.

Yours sincerely

T Cookson

Tim Cookson
Strategic Planning Manager